



Clovis Unified School District Office Expansion Phase II

Initial Study – Mitigated Negative Declaration

prepared by

Clovis Unified School District
1450 Herndon Avenue
Clovis, California 93611
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prepared with the assistance of

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October 2024



RINCON CONSULTANTS, INC. SINCE 1994

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Initial Study

1. Project Title

Clovis Unified School District Office Expansion Phase II

2. Lead Agency/Project Sponsor Name and Address

Clovis Unified School District (CUSD)
1450 Herndon Avenue
Clovis, California 93611

3. Contact Person and Phone Number

Nick Mele, Administrator, Facilities Services
(559) 327-9262

4. Project Location and Background

The project site is located at the southeast corner of the intersection of Herndon Avenue and North Fowler Avenue, on approximately 5.08 acres within Assessor's Parcel Number: 550-020-47T, owned by CUSD. The project site is designated in Township 13S, Range 21E, Sections 3 and 4. The project site consists of vegetative grass and disturbed soil.

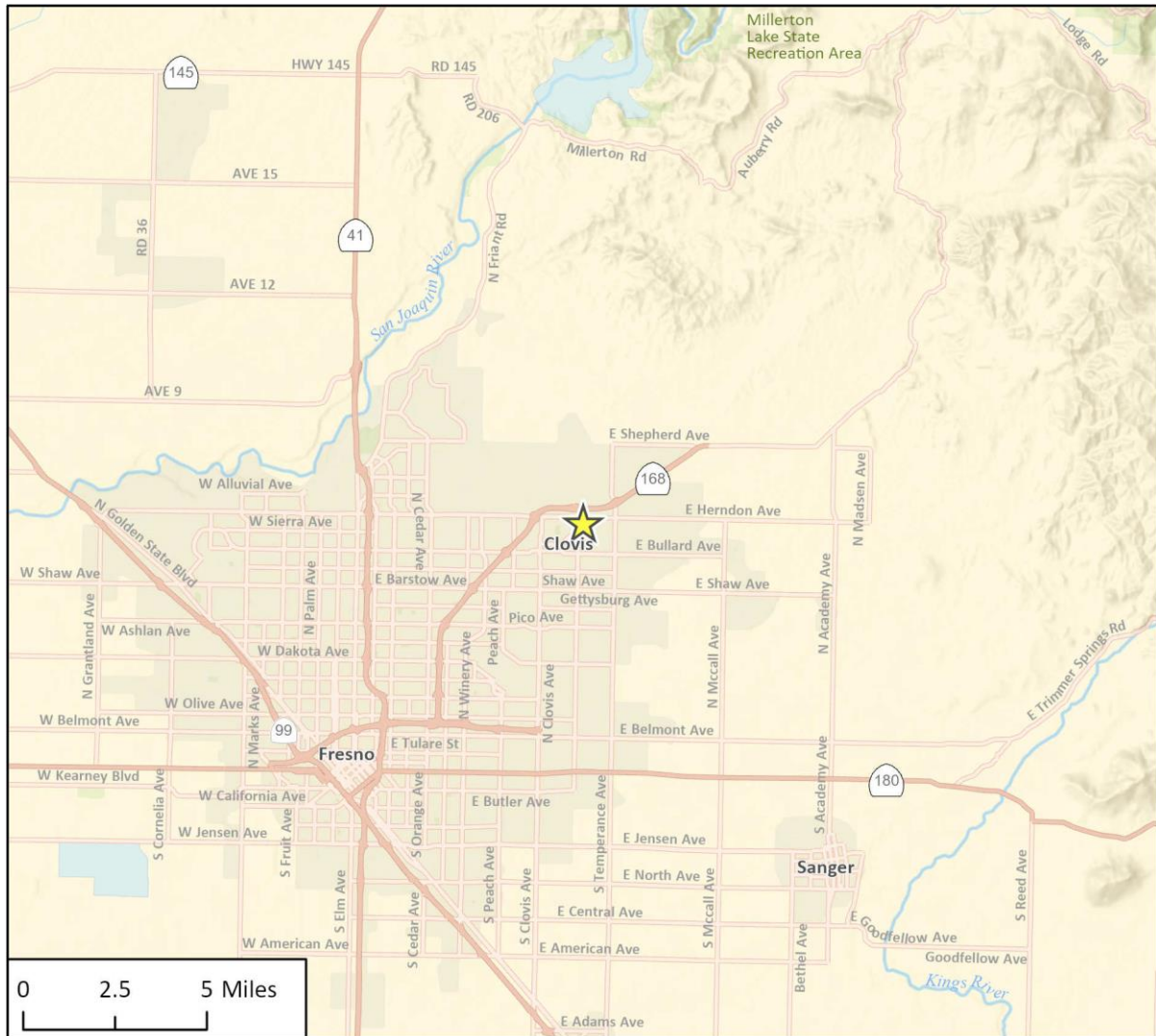
The project is Phase II of the CUSD Plant Operations Office Facilities Expansion. Phase I involved the construction of a 24,167-square foot (sf) Special Education Administration building, a 27,399-sf Online School building, and associated site improvements. These Phase I components are westerly adjacent to the Phase II project site. In June 2023, CUSD completed an Initial Study-Mitigated Negative Declaration (IS-MND) for Phase I, which included the 5.08-acre Phase II site within the overall 16.6-acre project boundary. However, the specifics of Phase II, including its location and potential environmental impacts, were not detailed at that time. Upon approval from the CUSD Board of Directors, a Notice of Determination for the 2023 IS-MND was signed August 2023.

Figure 1 illustrates the location of the project site from a regional perspective and Figure 2 provides a depiction of the project site from a local context, inclusive of the Phase I and Phase II (Project) boundaries.

5. General Plan and Zoning Designation

The project site is zoned Community Commercial (C-2) (City of Clovis 2024a) with a land use designation of General Commercial (GC) (City of Clovis 2014a).

Figure 1 Regional Location



Imagery provided by Esri and its licensors © 2024.

24-15993 EPS
 Fig 1 Regional Location

★ Project Location

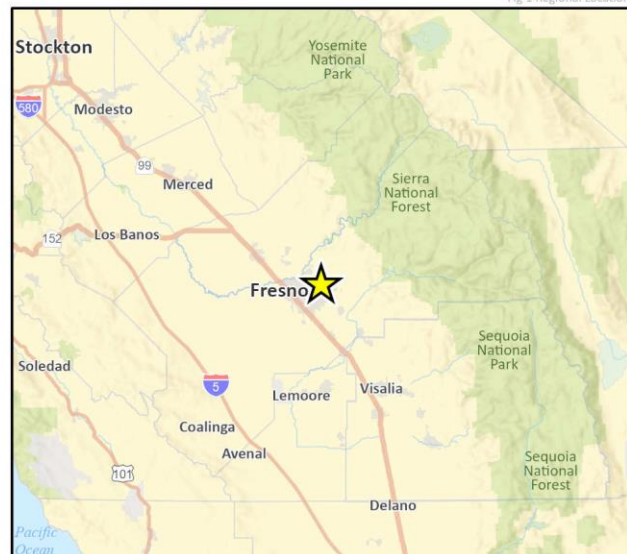
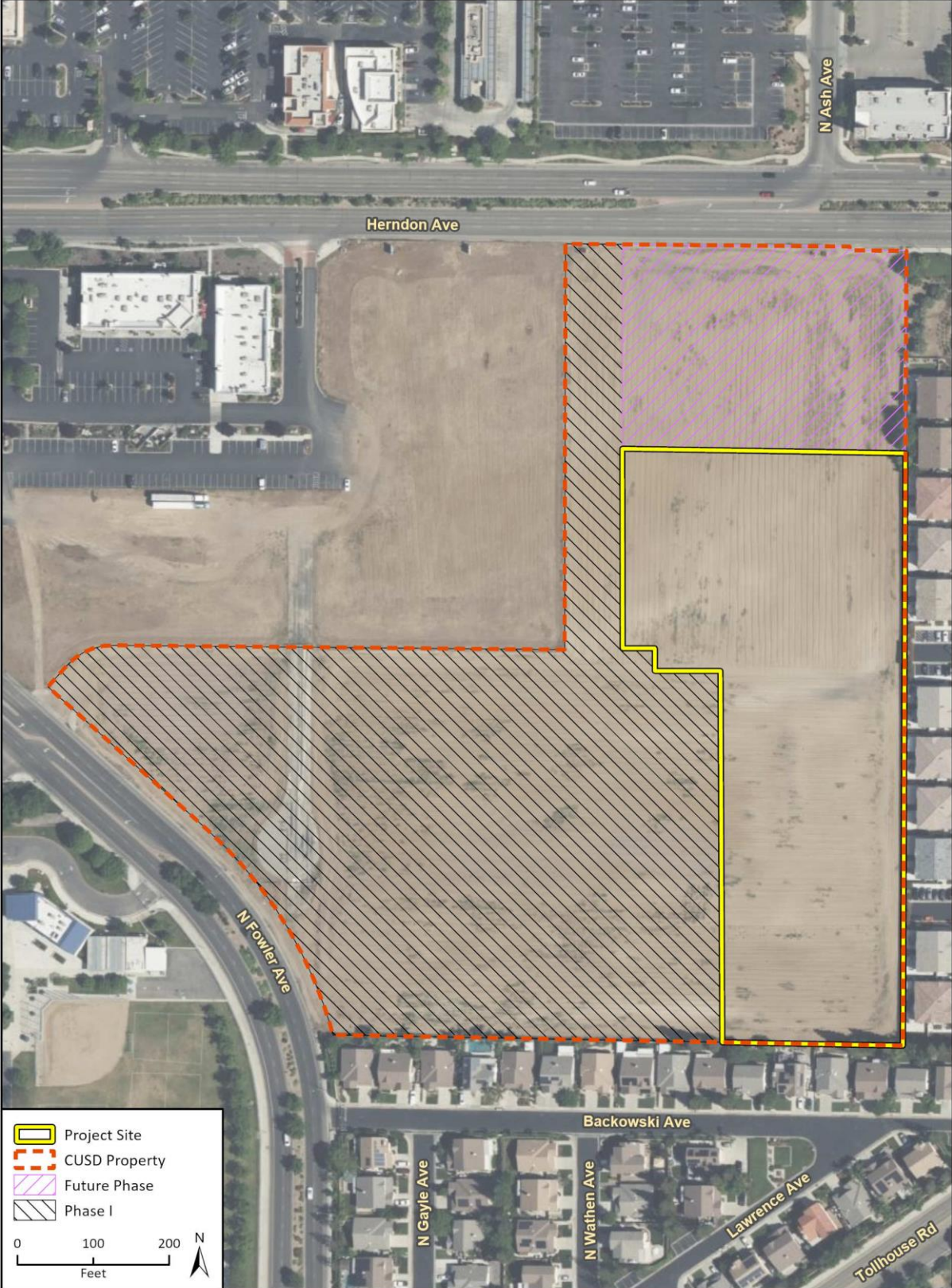


Figure 2 Project Location



Imagery provided by Microsoft Bing and its licensors © 2024.

24-15993 EPS
Fig 2 Project Location

6. Description of Project

The proposed project consists of Phase II of a multi-phased CUSD office development. Phase II would construct four buildings and associated site infrastructure, including parking, required for an administration office building and shop buildings. The approximate square footage for each building is provided below. Figure 3 depicts the project plans, including the location of each building, parking areas, and internal access roads.

- Building A: 11,848 sf
- Building B: 2,099 sf
- Building C: 9,337 sf
- Building D: 13,818 sf

All four buildings would be constructed from type v-b, pre-manufactured metal and would have six-foot-tall rooftop parapet walls. The proposed buildings would exceed Title 24 Building Energy Efficiency Standards by approximately 3.5 percent, with rooftop/solar canopy square footages (pursuant to California Energy Commission [CEC] Section 11.010) approximating 6,305 sf for Building A, 1,601 sf for Building B, 7,866 sf for Building C, and 11,310 sf for Building D. The project would include low flow plumbing fixtures as water conservation measures. The proposed project also includes the installation of three air compressors. Air compressors would include a 2 horsepower (hp) unit located at the southern end of Building B, a 7.5 hp unit located at the northern end of Building C, and a 3 hp unit located at the northern end of Building D. The proposed project would install five heating, ventilation, and air conditioning units at the following locations:

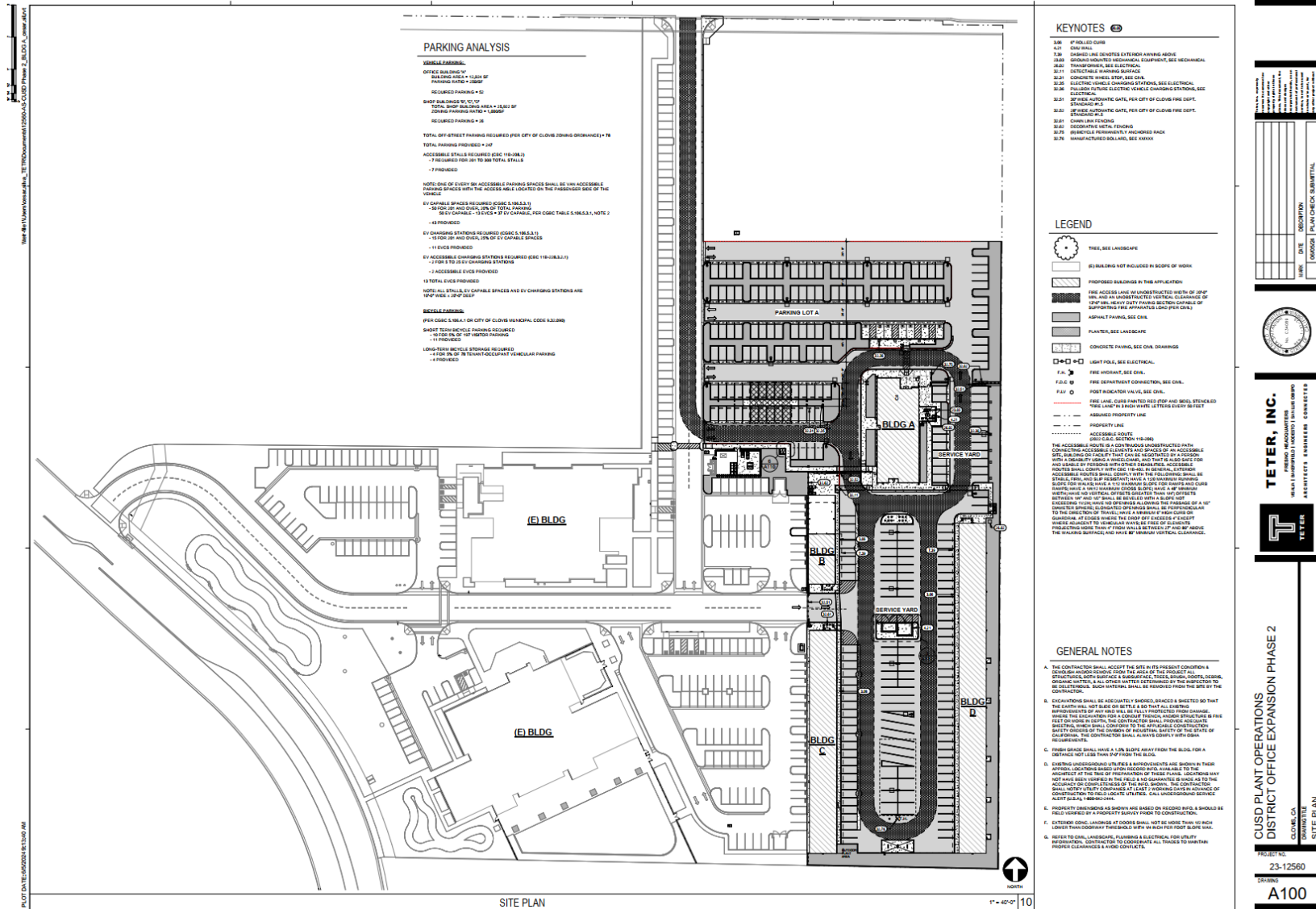
- On-grade, on the eastern side of Building A
- On-grade, on the western side of Building C
- Rooftop, on Building B
- Rooftop, on Building C
- Rooftop, on Building D

Herndon Avenue would provide access to the project site from the north, and North Fowler Avenue would provide access to the project site from the east. Two driveways would be constructed at these access points, which would connect to an internal circulation road that would provide access to all four buildings. The proposed project would include a parking lot on the northern portion of the project site with 247 parking spaces, including 13 passenger electric vehicle (EV) charging spaces supplied by Level 2 chargers. The project would also include 11 bicycle parking spaces.

Project construction is anticipated to occur between 7:00 AM and 3:30 PM for approximately 14 months beginning in January 2025. Project operation would consist of office uses (Building A) as well as shop uses (Buildings B, C, and D). The shop buildings would each contain various tools and machinery. The southern end of Building C would be used as a grounds environmental safety storage room. The southern end of Building D would be used as a concrete grading room.

Operational activities would not include student presence on-site. The project would be served by the City of Clovis for water and wastewater services; the Fresno Metropolitan Flood Control District (FMFCD) for stormwater services; the City of Clovis for solid waste services, and Pacific Gas and Electric (PG&E) for electricity. Operation of the proposed project would not involve natural gas usage.

Figure 3 Project Plans



KEYNOTES

3.06 IF MOULDED CURB
 4.01 CURB WALL
 5.06 HATCHED LINE DENOTES EXTERIOR FINISH ABOVE
 23.00 GROUND MOUNTED MECHANICAL EQUIPMENT, SEE MECHANICAL
 24.00 TRANSFORMER, SEE ELECTRICAL
 30.11 DETECTABLE WARNING SURFACE
 30.21 CONCRETE WALKWAY, SEE CIVIL
 30.22 ELECTRIC PANEL, CHARGING STATION, SEE ELECTRICAL
 30.36 FULCRUM FUTURE ELECTRIC VEHICLE CHARGING STATIONS, SEE ELECTRICAL
 30.51 30" WIDE AUTOMATIC GATE, PER CITY OF CLOVIS FIRE DEPT. STANDARD #1
 30.52 30" WIDE AUTOMATIC GATE, PER CITY OF CLOVIS FIRE DEPT. STANDARD #2
 30.61 CURB AND FINISH
 30.62 DECORATIVE METAL FINISH
 30.70 BICYCLE REPAIR/STORAGE WHEEL RACK
 30.76 MANUFACTURED ROLLARD, SEE XXXXX

LEGEND

TREE, SEE LANDSCAPE
 (B) BUILDING NOT INCLUDED IN SCOPE OF WORK
 PROPOSED BUILDINGS IN THIS APPLICATION
 FREE ACCESS LAINE UNSTRUCTURED WIDTH OF 20" OR MORE AND AN UNSTRUCTURED VERTICAL CLEARANCE OF 7' OR MORE, NEAR ANY PARKING SPACE, CORNER OF SUPPORTING FREE APPARATUS LOAD (PULKS)
 ASPHALT PAVING, SEE CIVIL
 PLANTER, SEE LANDSCAPE
 CONCRETE PAVING, SEE CIVIL DRAWINGS
 LIGHT POLE, SEE ELECTRICAL
 FIRE HYDRANT, SEE CIVIL
 F.D.C. FIRE DEPARTMENT CONNECTION, SEE CIVIL
 FOOT AND HANDRAIL, SEE CIVIL
 FIRE LANE, CURB PAINTED RED STOP AND GOEL, STRIPED AND LINE LANE TO INDICATE LEFT TURN EVERTY 20 FEET
 ASPHALT PROPERTY LINE
 PROPERTY LINE
 ACCESSIBLE ROUTE
 ACCESSIBLE ROUTE (SEE CIVIL DRAWINGS 110-106)

GENERAL NOTES

A. THE CONTRACTOR SHALL ACCEPT THE SITE IN ITS PRESENT CONDITION & CONDITION AND/OR REMEDIATION FROM AREA OF THE PROJECT. ALL EXISTING UTILITIES, STRUCTURES, AND OTHER FEATURES SHALL BE PRESERVED UNLESS OTHERWISE INDICATED BY THE CONTRACTOR. ALL OTHER UTILITIES ESTABLISHED BY THE APPLICABLE TO BE DULY MAINTAINED, AND NO OTHER UTILITIES SHALL BE REMOVED FROM THE SITE BY THE CONTRACTOR.

B. EXISTING CONDITIONS SHALL BE ACCURATELY SHOWN, AND NOTED SO THAT THE EARTH WILL NOT BE CUT OR SETTLE & SO THAT ALL EXISTING UTILITIES, STRUCTURES, AND OTHER FEATURES SHALL BE PRESERVED UNLESS OTHERWISE INDICATED BY THE CONTRACTOR. THE CONTRACTOR SHALL PROVIDE ACCURATE RECORDS, WHICH SHALL CONFORM TO THE APPLICABLE CONSTRUCTION SAFETY CIRCUITS OF THE COUNTY OF INDIANAPOLIS, SAFETY OF THE STATE OF INDIANAPOLIS. THE CONTRACTOR SHALL MAINTAIN ALL UTILITIES AS SHOWN.

C. FINISH GRADE SHALL HAVE A 2% SLOPE AWAY FROM THE BLDG FOR A DISTANCE NOT LESS THAN 10' FROM THE BLDG.

D. EXISTING UNDERGROUND UTILITIES & INFRASTRUCTURES ARE SHOWN IN THEIR APPROXIMATE LOCATIONS BASED UPON RECORDS AND AVAILABLE TO THE CONTRACTOR AT THE TIME OF PREPARATION OF THESE PLANS. LOCATIONS MAY VARY FROM THE SHOWN LOCATIONS. THE CONTRACTOR SHALL BE RESPONSIBLE FOR THE ACCURACY OF THE UTILITIES OF THE AREA SHOWN. THE CONTRACTOR SHALL VERIFY THE LOCATION OF ALL UTILITIES AT LEAST 10' AWAY FROM THE BLDG PRIOR TO CONSTRUCTION. CALL UNDERGROUND SERVICE AGENCY (CUSA) BEFORE ANY WORK.

E. PROPERTY DIMENSIONS AS SHOWN ARE BASED ON RECORDS AND SHOULD BE FIELD VERIFIED BY A PROPERTY SURVEY PRIOR TO CONSTRUCTION.

F. EXISTING CONC. LANDINGS AT DOORS SHALL NOT BE LOWER THAN 10" INCH LOWER THAN CURBWAY THEREAFTER WITH 10" INCHES FROM BLDG WALL.

G. REFER TO CIVIL, LANDSCAPE, PLUMBING & ELECTRICAL, FOR UTILITY INFORMATION. CONTRACTOR TO COORDINATE ALL THINGS TO MAINTAIN PROPER CLEARANCES & AVOID CONTACTS.

PROJECT INFORMATION

PROJECT NO. 23-12560
 DRAWING A100
 DATE 08/01/2023
 DRAWN BY J. HARRIS
 CHECKED BY J. HARRIS
 DESIGNED BY J. HARRIS
 PROJECT MANAGER J. HARRIS
 PROJECT ENGINEER J. HARRIS
 PROJECT ARCHITECT J. HARRIS

TETER, INC.
 1600 N. UNIVERSITY AVENUE, SUITE 100
 CLOVIS, CA 95326
 TEL: 530.833.1111
 WWW.TETERINC.COM

CUSD PLANT OPERATIONS DISTRICT OFFICE EXPANSION PHASE 2
 CLOVIS, CA
 DISTRICT OFFICE
 SITE PLAN

7. Surrounding Land Uses and Setting

Land uses surrounding the project site include commercial uses to the north, across Herndon Avenue, and to the west, beyond North Fowler Avenue. The Community Day Elementary School (an institutional land use) is located to the west of the project site, across North Fowler Avenue. Single-family residential land uses occur to the east and south of the project site (City of Clovis 2014a).

8. Other Public Agencies Whose Approval is Required

CUSD is the lead agency for the proposed project. Other public agencies whose approval is required include:

- City of Clovis: review and approval of the location, design, and construction of any water, sewer, and street improvements.
- FMFCD: review and approval of the location, design, and construction of storm drainage improvements.

9. Have California Native American Tribes Traditionally and Culturally Affiliated with the Project Area Requested Consultation Pursuant to Public Resources Code Section 21080.3.1?

Native American Tribes were notified about the project consistent with City and State regulations including, but not limited to, Assembly Bill (AB) 52. During the request for consultation window, one response was received from the Santa Rosa Rancheria Tachi-Yokut Tribe, which deferred to tribes more local to the project site. No other tribal agencies responded to the consultation request.

Environmental Factors Potentially Affected

This project would potentially affect the environmental factors checked below, involving at least one impact that is “Potentially Significant” or “Less than Significant with Mitigation Incorporated” as indicated by the checklist on the following pages.

- | | | |
|--|---|---|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Agriculture and Forestry Resources | <input type="checkbox"/> Air Quality |
| <input checked="" type="checkbox"/> Biological Resources | <input checked="" type="checkbox"/> Cultural Resources | <input type="checkbox"/> Energy |
| <input checked="" type="checkbox"/> Geology and Soils | <input type="checkbox"/> Greenhouse Gas Emissions | <input checked="" type="checkbox"/> Hazards and Hazardous Materials |
| <input type="checkbox"/> Hydrology and Water Quality | <input type="checkbox"/> Land Use and Planning | <input type="checkbox"/> Mineral Resources |
| <input type="checkbox"/> Noise | <input type="checkbox"/> Population and Housing | <input type="checkbox"/> Public Services |
| <input type="checkbox"/> Recreation | <input type="checkbox"/> Transportation | <input checked="" type="checkbox"/> Tribal Cultural Resources |
| <input type="checkbox"/> Utilities and Service Systems | <input type="checkbox"/> Wildfire | <input type="checkbox"/> Mandatory Findings of Significance |

Determination

Based on 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 to 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 “less than significant with mitigation incorporated” 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 measures 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.

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

Signature

Date

Printed Name

Title

Environmental Checklist

1 Aesthetics

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than - Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099, would the project:				
a. Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a. Would the project have a substantial adverse effect on a scenic vista?

Scenic vistas are places from which expansive views of a highly valued landscape can be observed by the public. They can be enjoyed from elevated places in the landscape or from roadways or other public places where the views stretch far into the distance. Scenic vistas may be informally recognized, or officially designated by a public agency. The project site is flat, surrounded by commercial and residential development, and within the urbanized city of Clovis. Therefore, the project site neither offers views of, nor constitutes a highly valued landscape, and is not a scenic vista. The City's General Plan does not formally recognize scenic vistas in the city of Clovis (City of Clovis 2014b). The project would have no impact on scenic vistas.

NO IMPACT

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

The California Department of Transportation's (Caltrans) Scenic Highway program does not include a designated State Scenic Highway within the city of Clovis near the project site. State Route (SR)-

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168 is located 0.2 mile north of the project site and is considered an “eligible” State Scenic Highway (Caltrans 2018). The project site does not contain trees, rock outcroppings, or historic buildings. Therefore, the project would have no impact involving the substantial damage of scenic resources visible from a State Scenic Highway.

NO IMPACT

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

CEQA defines an urbanized area as a central city or group of cities with a population of at least 50,000 people. Therefore, the City of Clovis, including the project site, is an urbanized area pursuant to CEQA. The project site is surrounded by existing development, including commercial uses to the north across Herndon Avenue and to the west beyond North Fowler Avenue; Community Day Elementary School to the west directly across North Fowler Avenue; and single family residences to the east and south. The project site, though undeveloped, is zoned single family residential. The surrounding area is generally characterized by different types of structures of varying heights, designs, and character. CUSD proposes an architectural aesthetic that would complement the surrounding area. The buildings would not substantially degrade the existing visual character or quality of public views of the site and its surroundings. As discussed under threshold 1a, there are no officially designated scenic areas in Clovis (City of Clovis 2014b). Therefore, the project would have a less than significant impact.

LESS THAN SIGNIFICANT IMPACT

- d. *Would the project create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?*

The project site is currently undeveloped. Phase I is currently under construction immediately to the west of the site. Existing sources of light and glare include indirect lighting from off-site sources of commercial and residential development that are adjacent to the site, as well as adjacent roadways. Off-site sources include streetlamps, light fixtures along building exteriors, light emanating from windows, and headlights from passing vehicles on Herndon Avenue or North Fowler Avenue. Project construction is not anticipated to occur during evening or nighttime hours and would thus not introduce new light sources to the project site during the construction time period. Consequently, the following discussion focuses on the project’s operational impact involving light and glare.

During operation, the proposed project would introduce new sources of light and glare, including nighttime illumination of the four buildings and parking areas; headlights from vehicles that arrive or depart during nighttime hours; and glare that reflects from the buildings’ exteriors. In accordance with Clovis Municipal Code (CMC) Section 9.22.050, project lighting would be directed downward and shielded such that all direct light and glare is confined within the project site, and would be appropriate in height, intensity, and scale to the proposed office and shop building uses. Therefore, with adherence to existing regulatory requirements, the project would have a less than significant impact involving the creation of a new source of substantial light and glare.

LESS THAN SIGNIFICANT IMPACT

2 Agriculture and Forestry Resources

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

Would the project:

a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict with existing zoning for agricultural use or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

The project site is identified as Farmland of Local Importance by the California Department of Conservation’s (DOC) Farmland Mapping and Monitoring Program (DOC 2024). Therefore, the project site does not contain Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland). The project site is currently vacant and consists of disturbed soil and vegetative grass, and is not used for agriculture. The proposed project would not convert Farmland to non-agricultural use. No impact would occur.

NO IMPACT

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- b. *Would the project conflict with existing zoning for agricultural use or a Williamson Act contract?*

The project site is designated General Commercial and zoned Community Commercial (C-2) (City of Clovis 2014a; 2024). The project site is not enrolled in a Williamson Act contract (DOC 2023). Therefore, the proposed project would not conflict with existing zoning for agricultural use or a Williamson Act contract. No impact would occur.

NO IMPACT

- c. *Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)); timberland (as defined by Public Resources Code Section 4526); or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?*
- d. *Would the project result in the loss of forest land or conversion of forest land to non-forest use?*

The project site is not zoned for, located within, or adjacent to designated forest land, timberland, or timberland production zones. As no forest land exists within the project site, the proposed project would not result in the loss of forest land or the conversion of forest land to non-forest use. No impact would occur.

NO IMPACT

- e. *Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?*

As discussed under thresholds 2a and 2b, the project site does not contain existing Farmland and is not under agricultural use. As discussed under thresholds 2c and 2d, the project site does not contain forest land. The project would involve the construction of four buildings with administrative and commercial uses on a disturbed site within an urbanized environment. Therefore, the proposed project would not involve other changes in the existing environment that could result in the conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use. No impact would occur.

NO IMPACT

3 Air Quality

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than - Significant Impact	No Impact
Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Local Climate and Meteorology

The project site is located in the San Joaquin Valley Air Basin (SJVAB), as established by the California Air Resources Board (CARB). The SJVAB is under the jurisdiction of the San Joaquin Valley Air Pollution Control District (SJVAPCD).

The SJVAB is bordered by the San Francisco Bay Air Basin and North Central Coast Air Basin to the west, the South Central Coast Air Basin to the southwest, the Mojave Desert Air Basin to the southeast, the Great Basin Valleys Air Basin to the east, and the Sacramento Valley Air Basin and Mountain Lake Tahoe Counties Air Basin to the north. The SJVAB has an inland Mediterranean climate, which is characterized by hot, dry summers and cool, rainy winters. Annual rainfall totals vary from north to south, with northern counties experiencing as much as eleven inches of rainfall and southern counties experiencing as little as four inches per year. Air pollutants are generally transported from the north to the south and in a reverse flow in the winter due to these influences.

Sources of Air Pollution

Air pollutant emissions in the SJVAB are generated primarily by stationary and mobile sources. Stationary sources can be divided into two major subcategories:

- Point sources occur at a specific location and are often identified by an exhaust vent or stack. Examples include boilers or combustion equipment that produce electricity or generate heat.
- Area sources are widely distributed and include such sources as residential and commercial water heaters, painting operations, lawn mowers, agricultural fields, landfills, and some consumer products.

Mobile sources refer to emissions from motor vehicles, including tailpipe and evaporative emissions, and can also be divided into two major subcategories:

- On-road sources may be legally operated on roadways and highways.
- Off-road sources include aircraft, ships, trains, and self-propelled construction equipment.

Air pollutants can also be generated by the natural environment, such as when high winds suspend fine dust particles.

Air Quality Standards

The federal and State Clean Air Acts (CAA) mandate the control and reduction of certain air pollutants. Under these laws, the United States Environmental Protection Agency (USEPA) and CARB have established the National Ambient Air Quality Standards (NAAQS) and the California Ambient Air Quality Standards (CAAQS) for “criteria pollutants” and other pollutants. Some pollutants are emitted directly from a source (e.g., vehicle tailpipe, an exhaust stack of a factory, etc.) into the atmosphere, including carbon monoxide (CO), volatile organic compounds (VOC)/reactive organic gases (ROG),¹ nitrogen oxides (NO_x), particulate matter with diameters of up to ten microns (PM₁₀) and up to 2.5 microns (PM_{2.5}), sulfur dioxide, and lead. Other pollutants are created indirectly through chemical reactions in the atmosphere, such as ozone, which is created by atmospheric chemical and photochemical reactions primarily between ROG and NO_x. Secondary pollutants include oxidants, ozone, and sulfate and nitrate particulates (smog). Primary standards are those levels of air quality deemed necessary, with an adequate margin of safety, to protect public health. In addition, California has established health-based ambient air quality standards for these and other pollutants, some of which are more stringent than the federal standards.

SJVAPCD is the designated air quality control agency for the SJVAB. The SJVAB is designated as nonattainment for the state one-hour ozone standard and PM₁₀ standard, and nonattainment for the federal and state eight-hour ozone standard and PM_{2.5} standard. The SJVAB is designated in attainment for all other federal and state standards. The following subsections describe the characteristics, sources, and health and atmospheric effects of air pollutants of primary concern.

Ozone

A photochemical reaction (triggered by sunlight) between NO_x and VOCs produces ozone. NO_x is formed during fuel combustion and VOCs form during combustion and evaporation of organic solvents. Because O₃ requires sunlight to form, it mostly occurs in substantial concentrations between the months of April and October. Ozone is a pungent, colorless, toxic gas with direct health effects on humans including respiratory and eye irritation and possible changes in lung function. Groups most sensitive to O₃ include children, the elderly, people with respiratory disorders, and people who exercise strenuously outdoors (USEPA 2023).

Suspended Particulates

Atmospheric particulate matter is made of finely divided solids and liquids such as dust, soot, aerosols, fumes, and mist. The particulates of particular concern are PM₁₀ and PM_{2.5}. The characteristics, sources, and potential health effects associated with small particulates can be

¹ CARB defines VOC and ROG similarly as, “any compound of carbon excluding carbon monoxide, carbon dioxide, carbonic acid, metallic carbides or carbonates, and ammonium carbonate,” with the exception that VOC are compounds that participate in atmospheric photochemical reactions. For the purposes of this analysis, ROG and VOC are considered comparable in terms of mass emissions, and the term ROG is used in this SEIR.

different. Agricultural operations are major man-made sources of PM₁₀ along with industrial processes, combustion of fossil fuels, construction and demolition operations, and entrainment of road dust into the atmosphere. Natural sources include windblown dust, wildfire smoke, and sea spray salt. The finer PM_{2.5} particulates are associated generally with combustion processes and form in the atmosphere as a secondary pollutant through chemical reactions. PM_{2.5} is more likely to penetrate deeply into the lungs and poses a serious health threat to all groups, but particularly to the elderly, children, and those with respiratory problems. More than half of the small and fine particulate matter inhaled into the lungs remains there and can cause permanent lung damage. These materials can damage health by interfering with the body's mechanisms for clearing the respiratory tract or by acting as carriers of an absorbed toxic substance (USEPA 2023).

Lead

Lead (Pb) is a metal found naturally in the environment, as well as in manufacturing products. The major sources of Pb emissions historically have been mobile and industrial. However, due to the USEPA's regulatory efforts to remove lead from gasoline, atmospheric Pb concentrations have declined substantially over the past several decades. The most dramatic reductions in Pb emissions occurred before 1990 due to the removal of Pb from gasoline sold for most highway vehicles. Pb emissions were further reduced substantially between 1990 and 2008, with reductions occurring in the metals industries at least partly due to national emissions standards for hazardous air pollutants (USEPA 2023). As a result of phasing out leaded gasoline, metal processing is currently the primary source of Pb emissions. The highest Pb level in the air is generally found near Pb smelters. Other stationary sources include waste incinerators, utilities, and Pb-acid battery manufacturers. Pb can adversely affect the nervous system, kidney function, immune system, reproductive and developmental systems, and cardiovascular system depending on exposure. Pb exposure also affects the oxygen-carrying capacity of the blood. The Pb effects most likely encountered in current populations are neurological in children. Infants and young children are susceptible to Pb exposures, contributing to behavioral problems, learning deficits, and lowered intelligence quotient (USEPA 2023).

Toxic Air Contaminants

According to California Health and Safety Code §39655, a toxic air contaminant (TAC) is "an air contaminant which may cause or contribute to an increase in mortality or an increase in serious illness, or which may pose a present or potential hazard to human health." Section 4712 of Title 42 of the United States Code indicates 189 substances that have been listed as federal hazardous air pollutants are classified as TACs under the state's air toxics program, California Health and Safety Code §39657(b).

TACs can cause cancer and other types of long-term health effects, depending on the particular chemical, their type, and duration of exposure. Some TACs can result in short-term health effects. The ten TACs that pose the greatest health risk in California comprise acetaldehyde, benzene, 1-3 butadiene, carbon tetrachloride, hexavalent chromium, para-dichlorobenzene, formaldehyde, methylene chloride, perchlorethylene, and diesel PM. Mobile sources of TACs include freeways and other roads with high traffic volumes; stationary sources include distribution centers, rail yards, ports, refineries, dry cleaners, and large gas dispensing facilities. The project site is not located close to any of these land uses.

Dust-related Concerns

Valley Fever

Valley Fever or coccidioidomycosis is caused locally by the microscopic fungus *Coccidioides immitis* (*C. immitis*). The *Coccidioides* fungus resides in the soil in southwestern United States, northern Mexico, and parts of Central and South America. During drought years, the number of organisms competing with *C. immitis* decreases, and *the C. immitis* remains alive but dormant. When rain finally occurs, the fungal spores germinate and multiply more than usual because of fewer other competing organisms. Later, the soil dries out in the summer and fall, and the fungi can become airborne and potentially infectious (Kirkland and Fierey 1996).

Infection occurs when the spores of the fungus become airborne and are inhaled. The fungal spores become airborne when contaminated soil is disturbed by human activities, such as construction and agricultural activities, and natural phenomena, such as windstorms, dust storms, and earthquakes. About 60 percent of infected persons have no symptoms. The remainder develop flu-like symptoms that can last for a month and tiredness that can sometimes last for longer than a few weeks. Common symptoms include fatigue, cough, chest pain, fever, rashes on upper body or legs, headaches, muscle aches, night sweats, and unexplained weight loss (California Department of Public Health [CDPH] 2023). A small percentage of infected persons (less than one percent) can develop disseminated disease that spreads outside the lungs to the brain, bone, and skin. Without proper treatment, Valley Fever can lead to severe pneumonia, meningitis, and even death. Both humans and animals can become infected with Valley Fever, but the infection is not contagious and cannot spread from one person or animal to another (CDPH 2023).

Persons at highest risk from exposure are those with compromised immune systems, such as those with human immunodeficiency virus and those with chronic pulmonary disease. Farmers, construction workers, and others who engage in activities that disturb the soil are at highest risk for Valley Fever. Infants, pregnant women, diabetics, people of African, Asian, Latino, or Filipino descent, and the elderly may be at increased risk for disseminated disease. Historically, people at risk for infection are individuals not already immune to the disease and whose jobs involve extensive contact with soil dust, such as construction or agricultural workers and archeologists. Most cases of Valley Fever (over 65 percent) are diagnosed in people living in the Central Valley and Central Coast regions (CDPH 2023).

There is no vaccine to prevent Valley Fever. However, CDPH recommends the following practical tips to reduce exposure (2021):

- Stay inside and keep windows and doors closed when it is windy outside and the air is dusty, especially during dust storms.
- Consider avoiding outdoor activities that involve close contact to dirt or dust, including yard work, gardening, and digging, especially if you are in one of the groups at higher risk for severe or disseminated Valley fever.
- Cover open dirt areas around your home with grass, plants, or other ground cover to help reduce dusty, open areas.
- While driving in these areas, keep car windows closed and use recirculating air, if available.
- Try to avoid dusty areas, like construction or excavation sites.

- If you cannot avoid these areas, or if you must be outdoors in dusty air, consider wearing an N95 respirator (a type of face mask) to help protect against breathing in dust that can cause Valley fever.

However, if in situations where digging dirt or stirring up dust would happen, then the following tips are recommended:

- Stay upwind of the area where dirt is being disturbed.
- Wet down soil before digging or disturbing dirt to reduce dust.
- Consider wearing an N95 respirator (mask).
- After returning indoors, change out of clothes if covered with dirt.
- Be careful not to shake out clothing and breathe in the dust before washing. If someone else is washing your clothes, warn the person before they handle the clothes.

In 2022, approximately 448 cases of Valley Fever were reported in Fresno County. This is an increase of 43 cases compared to 2021 (405 cases) (CDPH 2024).

Sensitive Receptors

USEPA and CARB established ambient air quality standards to represent the levels of air quality considered sufficient, with a margin of safety, to protect public health and welfare. They intend to protect the segment of the public most susceptible to respiratory distress: children under 14, adults over 65, persons engaged in strenuous work or exercise, and people with cardiovascular and chronic respiratory diseases. The majority of sensitive receptor locations are schools, hospitals, and residences. Sensitive receptors in the vicinity of the project site include single-family residences approximately 520 feet north and single-family residences directly east of the project site.

Regulatory Setting

Federal and State Regulations

FEDERAL AND CALIFORNIA CLEAN AIR ACTS

The federal CAA governs air quality in the United States and is administered by the USEPA at the federal level. Air quality in California is also governed by regulations under the California CAA, which is administered by CARB at the state level. At the regional and local levels, local air districts such as the SJVAPCD typically administer the federal and California CAA. As part of implementing the federal and California CAA, the USEPA and CARB have established ambient air quality standards for major pollutants at thresholds intended to protect public health. Table 1 summarizes the CAAQS and the NAAQS. The CAAQS are more restrictive than the NAAQS for several pollutants, including the one-hour standard for CO, the 24-hour standard for sulfur dioxide, and the 24-hour standard for PM₁₀.

California is divided geographically into 15 air basins for managing the air resources of the state on a regional basis. Areas within each air basin are considered to share the same air masses and, therefore, are expected to have similar ambient air quality. Depending on whether the standards are met or exceeded, the local air basin is classified as in “attainment” or “non-attainment.” Once a nonattainment area has achieved the air quality standards for a particular pollutant, it may be redesignated to an attainment area for that pollutant. To be redesignated, the area must meet air quality standards and have a 10-year plan for continuing to meet and maintain air quality standards, as well as satisfy other requirements of the federal CAA. Areas that have been redesignated to

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attainment are called maintenance areas. Some areas are unclassified, which means insufficient monitoring data are available; unclassified areas are considered to be in attainment. Table 1 presents the attainment status of the SJVAB for each of the CAAQS and NAAQS. As shown therein, the SJVAB is designated nonattainment for the federal and state ozone and PM_{2.5} standards, and nonattainment for the state PM₁₀ standard.

Table 1 Ambient Air Quality Standards and Basin Attainment Status

Pollutant	Averaging Time	Federal Primary Standards ¹	NAAQS Attainment Status	California Standards ¹	CAAQS Attainment Status
Ozone	1-Hour	–	N/A	0.09 ppm	N
	8-Hour	0.070 ppm	N	0.070 ppm	N
Carbon Monoxide	8-Hour	9.00 ppm	A	9.00 ppm	A
	1-Hour	35.00 ppm	A	20.00 ppm	A
Nitrogen Dioxide	Annual	0.053 ppm	A	0.030 ppm	A
	1-Hour	0.100 ppm	A	0.180 ppm	A
Sulfur Dioxide	24-Hour	–	N/A	0.04 ppm	A
	3-Hour	0.5 ppm	A	–	N/A
	1-Hour	0.075 ppm	A	0.25 ppm	A
PM ₁₀	Annual	–	N/A	20 µg/m ³	N
	24-Hour	150 µg/m ³	A	50 µg/m ³	N
PM _{2.5}	Annual	9. µg/m ³	N	12 µg/m ³	N
	24-Hour	35 µg/m ³	N	–	N/A
Lead	30-Day Average	–	N/A	1.5 µg/m ³	A
	3-Month Average	0.15 µg/m ³	N/A	–	N/A

Notes: N/A = not applicable, N = nonattainment, A = attainment; U = unclassified; ppm = parts per million; µg/m³ = micrograms per cubic meter

¹ CARB 2022a

CONSTRUCTION EQUIPMENT FUEL EFFICIENCY STANDARD

USEPA sets emission standards for construction equipment. The first federal standards (Tier 1) were adopted in 1994 for all off-road engines over 50 hp and were phased in by 2000. A new standard was adopted in 1998 that introduced Tier 1 for all equipment below 50 hp and established the Tier 2 and Tier 3 standards. The Tier 2 and Tier 3 standards were phased in by 2008 for all equipment. The current iteration of emissions standards for construction equipment are the Tier 4 efficiency requirements, which are contained in 40 Code of Federal Regulations Parts 1039, 1065, and 1068 (originally adopted in 69 Federal Register 38958 [June 29, 2004], and most recently updated in 2014 [79 Federal Register 46356]). Emissions requirements for new off-road Tier 4 vehicles were completely phased in by the end of 2015.

CALIFORNIA BUILDING STANDARDS CODE

The California Code of Regulations (CCR) Title 24 is referred to as the California Building Standards Code. It consists of a compilation of several distinct standards and codes related to building construction including plumbing, electrical, interior acoustics, energy efficiency, and handicap accessibility for persons with physical and sensory disabilities. The California Building Standards Code's energy-efficiency and green building standards are outlined below.

Part 6 – Building Energy Efficiency Standards/Energy Code

CCR Title 24, Part 6 is the Building Energy Efficiency Standards or California Energy Code. This code, originally enacted in 1978, establishes energy-efficiency standards for residential and non-residential buildings in order to reduce California's energy demand. New construction and major renovations must demonstrate their compliance with the current Energy Code through submittal and approval of a Title 24 Compliance Report to the local building permit review authority and the CEC. The 2019 Title 24 standards are the applicable building energy efficiency standards for the project because they became effective on January 1, 2020.

Part 11 – California Green Building Standards

The California Green Building Standards Code, referred to as CALGreen, was added to Title 24 as Part 11, first in 2009 as a voluntary code, which then became mandatory effective January 1, 2011 (as part of the 2010 California Building Standards Code). The 2019 CALGreen includes mandatory minimum environmental performance standards for all ground-up new construction of residential and non-residential structures. It also includes voluntary tiers (Tiers I and II) with stricter environmental performance standards for these same categories of residential and non-residential buildings. Local jurisdictions must enforce the minimum mandatory CALGreen standards and may adopt additional amendments for stricter requirements.

The mandatory standards require:

- 20 percent reduction in indoor water use relative to specified baseline levels;²
- 65 percent construction/demolition waste diverted from landfills;
- Inspections of energy systems to ensure optimal working efficiency;
- Low-pollutant emitting exterior and interior finish materials such as paints, carpets, vinyl flooring, and particleboards;
- Dedicated circuitry to facilitate installation of EV charging stations in newly constructed attached garages for single-family and duplex dwellings; and
- Designation of at least ten percent of parking spaces for multi-family residential developments and six percent of parking spaces for hotel development with more than 201 parking spaces as EV charging spaces capable of supporting future EV supply equipment.

TOXIC AIR CONTAMINANTS

In 1983, the California Legislature enacted a program to identify the health effects of TACs and to reduce exposure to these contaminants to protect the public health (AB 1807: California Health and Safety Code Sections 39650–39674). The Legislature established a two-step process to address the potential health effects from TACs. The first step is the risk assessment (or identification) phase. The second step is the risk management (or control) phase of the process. The California Air Toxics Program establishes the process for the identification and control of TAC emissions and includes provisions to make the public aware of significant toxic exposures and to reduce risk. Additionally, the Air Toxics "Hot Spots" Information and Assessment Act (AB 2588), enacted in 1987, requires stationary sources to report the types and quantities of certain substances routinely released into the air. The goals of the Air Toxics "Hot Spots" Act are to collect emission data, identify facilities

² Similar to the compliance reporting procedure for demonstrating Energy Code compliance in new buildings and major renovations, compliance with the CALGreen water reduction requirements must be demonstrated through completion of water use reporting forms. Buildings must demonstrate a 20 percent reduction in indoor water use by either showing a 20 percent reduction in the overall baseline water use as identified in CALGreen or a reduced per-plumbing-fixture water use rate.

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having localized impacts, ascertain health risks, notify nearby residents of significant risks, and reduce those significant risks to acceptable levels. The Children's Environmental Health Protection Act (Chapter 731, Escutia, Statutes of 1999; Senate Bill 25) focuses on children's exposure to air pollutants. The act requires the CARB to review its air quality standards from a children's health perspective, evaluate the statewide air quality monitoring network, and develop any additional air toxic control measures needed to protect children's health.

Regional and Local Regulations

SAN JOAQUIN VALLEY AIR POLLUTION CONTROL DISTRICT

The project site is located within the jurisdiction of SJVAPCD, which regulates air pollutant emissions throughout the SJVAB. SJVAPCD enforces regulations and administers permits governing stationary sources. Pursuant to AB 205 subsection 25545.1(b)(1), the CEC retains exclusive authority over permitting and supersedes any applicable statute, ordinance, or regulation of a local air quality management district. In the absence of CEC jurisdiction, the following regional rules and regulations are related to the proposed Project:

- **Regulation VIII (Fugitive PM₁₀ Prohibitions)** contains rules developed pursuant to USEPA guidance for “serious” PM₁₀ nonattainment areas. Rules included under this regulation limit fugitive PM₁₀ emissions from the following sources: construction, demolition, excavation, extraction, and other earth moving activities, bulk materials handling, carryout and track-out, open areas, paved and unpaved roads, unpaved vehicle/equipment traffic areas, and agricultural sources. Various control measures would be implemented by the Applicants during project construction activities pursuant to *Rule 8021, Construction, Demolition, Excavation, Extraction, and Other Earthmoving Activities*.
- **Rule 2201 (New and Modified Stationary Source Review Rule)** applies to all new stationary sources or modified existing stationary sources that are subject to the SJVAPCD permit requirements. The rule requires review of the new or modified stationary source to ensure that the source does not interfere with the attainment or maintenance of ambient air quality standards.
- **Rule 4101 (Visibility)** limits the visible plume from any source to 20 percent opacity.
- **Rule 4102 (Nuisance)** prohibits the discharge of air contaminants or other materials in quantities that may cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public or which endanger the comfort, repose, health, or safety of any such person or the public.
- **Rule 4601 (Architectural Coatings)** limits VOC emissions from architectural coatings. This rule specifies architectural coatings storage, cleanup, and labeling requirements.
- **Rule 4641 (Cutback, Slow Cure, and Emulsified Asphalt, Paving, and Maintenance Operations)** limits VOC emissions by restricting the application and manufacturing of certain types of asphalt for paving and maintenance operations and applies to the manufacture and use of cutback asphalt, slow cure asphalt and emulsified asphalt for paving and maintenance operations.
- **Rule 9510 (Indirect Source Review)** requires certain development projects to mitigate exhaust emissions from construction equipment greater than 50 hp to 20 percent below statewide average NO_x emissions and 45 percent below statewide average PM₁₀ exhaust emissions. This rule also requires applicants to reduce baseline emissions of NO_x and PM₁₀ emissions associated with operations by 33.3 percent and 50 percent respectively over a period of 10 years (SJVAPCD 2017).

In addition to reducing a portion of the development project's impact on air quality through compliance with District Rule 9510, a developer can further reduce a project's impact on air quality by entering a "Voluntary Emission Reduction Agreement" with the SJVAPCD to further mitigate project impacts under CEQA. Under a VERA, the developer may fully mitigate project emission impacts by providing funds to the SJVAPCD, which then are used by the SJVAPCD to administer emission reduction projects (SJVAPCD 2015b).

AIR QUALITY MANAGEMENT PLAN

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

Ozone Attainment Plans

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

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

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

Particulate Matter Attainment Plans

SJVAPCD adopted the *2018 Plan for the 1997, 2006, and 2012 PM_{2.5} Standards* in November 2018. This plan addresses the USEPA federal 1997 annual PM_{2.5} standard of 15 µg/m³ and the 24-hour PM_{2.5} standard of 65 µg/m³; the 2006 24-hour PM_{2.5} standard of 35 µg/m³; and the 2012 annual PM_{2.5} standard of 12 µg/m³. The plan demonstrates attainment of the federal PM_{2.5} standards as expeditiously as practicable as required under the federal CAA (SJVAPCD 2018). SJVAPCD is currently developing the 2023 Plan for the 2012 Annual PM_{2.5} Standard.

CLOVIS GENERAL PLAN

The project site is located within the City of Clovis. Although school districts, including CUSD, are exempt from local land use controls, the following goals and policies from the City of Clovis General Plan are applicable to the project:

- **Policy 1.1: Land use and transportation.** Reduce greenhouse gas and other local pollutant emissions through mixed use and transit-oriented development and well-designed transit, pedestrian, and bicycle systems.
- **Policy 1.2: Sensitive Land Uses.** Prohibit, without sufficient mitigation, the future siting of sensitive land uses within the distances of emission sources as defined by CARB.
- **Policy 1.3: Construction activities.** Encourage the use of best management practices during construction activities to reduce emissions of criteria pollutants as outlined by the SJVAPCD.
- **Policy 1.4: City buildings.** Require that municipal buildings be designed to exceed energy and water conservation and greenhouse gas reduction standards set in the California Building Code.
- **Policy 1.5: Fleet operations.** Purchase low- or zero-emission vehicles for the city's fleet where feasible. Use clean fuel sources for city-owned mass transit vehicles, automobiles, trucks, and heavy equipment where feasible.
- **Policy 1.6: Alternative fuel infrastructure.** Encourage public and private activity and employment centers to incorporate electric charging and alternative fuel stations.
- **Policy 1.7: Employment measures.** Encourage employers to provide programs, scheduling options, incentives, and information to reduce vehicle miles traveled by employees.
- **Policy 1.8: Trees.** Maintain or plant trees where appropriate to provide shade, absorb carbon, improve oxygenation, slow stormwater runoff, and reduce the heat island effect.

Existing Ambient Air Quality

SJVAPCD operates multiple air quality monitoring stations in the SJVAB within Fresno County. The nearest monitoring station is the Clovis-N Villa Avenue monitoring station, located at 908 N. Villa Avenue, approximately 2.2 miles southwest of the project site. This monitoring station measures only ozone, nitrogen dioxide, PM₁₀ and PM_{2.5}. Because monitoring is not generally conducted for pollutants for which the SJVAB is in attainment, there is no recent monitoring data available for CO or SO₂.

Table 2 indicates the number of days that each of the federal and state standards has been exceeded at Clovis-N Villa Avenue monitoring station in each of the last three years for which data is available. The federal and State 8-hour ozone standards and the State 1-hour ozone standard were all three years (2021-2023). Additionally, the PM_{2.5} federal standards were exceeded in 2021 and 2022, and PM₁₀ state standards were exceeded all three years. No other federal or state standards were exceeded at this monitoring station.

Table 2 Ambient Air Quality at the Monitoring Station

Pollutant	2021	2022	2023
Ozone			
8 Hour Ozone (ppm), 8-Hr Maximum	0.100	0.084	0.083
Number of Days of State exceedances (>0.070)	34	23	21
Number of days of Federal exceedances (>0.070)	34	23	21
Ozone (ppm), Worst Hour	0.123	0.109	0.102
Number of days above State standard (>0.09 ppm)	9	3	3
Respirable Particulate Matter, PM₁₀			
Particulate Matter 10 microns, mg/m ³ , Worst 24 Hours	125	127	105
Number of days above State standard (>50 mg/m ³)	112	74	44
Number of days above Federal standard (>150 mg/m ³)	0	0	0
Fine Particulate Matter, PM_{2.5}			
Particulate Matter <2.5 microns, mg/m ³ , Worst 24 Hours	105	42	35
Number of days above Federal standard (>35 mg/m ³)	22	4	0
Nitrogen Dioxide, NO₂			
Nitrogen Dioxide (ppb), Worst Hour	49	52	48
Number of days above State standard (>180 ppb)	0	0	0
Number of days above Federal standard (>100 ppb)	0	0	0

µg/m³ = micrograms per cubic meter; ppb = parts per billion;
Source: CARB 2024.

Impact Analysis

a. Would the project conflict with or obstruct implementation of the applicable air quality plan?

According to the SJVAPCD’s *Guidance for Assessing and Mitigating Air Quality Impacts (GAMAQI) (2015a)*, projects with emissions below the thresholds of significance for criteria pollutants would be determined to “not conflict or obstruct implementation of the District’s air quality plan.” As discussed under threshold 3b, below, project construction emissions would not exceed the SJVAPCD’s thresholds of significance. In addition, as discussed under thresholds 17a and 17b in Environmental Checklist Section 17, *Transportation*, the proposed project would not result in a significant increase in vehicle miles traveled (VMT) and would be consistent with the Fresno Council of Government’s 2022 Regional Transportation Plan and Sustainable Communities Strategies. Therefore, the project would not conflict with or obstruct implementation of the applicable air quality management plan. Impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

b. Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

According to the SJVAPCD’s GAMAQI (2015a), if project emissions would not exceed State and federal ambient air quality standards at the project’s property boundaries, the project would be

considered to not violate any air quality standard or contribute substantially to an existing or projected air quality violation. Additionally, if project-specific emissions exceed the thresholds of significance for criteria pollutants, then the project would be expected to result in a cumulatively considerable net increase of any criteria pollutant for which SJVAPCD is in non-attainment under applicable federal or State ambient air quality standards. The following subsections analyze project-specific construction and operational emissions.

Project Construction

Construction emissions are temporary in nature but have the potential to represent a significant short-term impact with respect to air quality. Operation of off-road construction equipment and mobile sources (e.g., delivery vehicles, construction worker vehicles) would generate criteria pollutant emissions. Generation of these emissions varies as a function of the types and number of heavy-duty, off-road equipment used, the intensity and frequency of their operation, and vehicle trips per day associated with delivery of construction materials, the importing and exporting of soil, vendor trips, and worker commute trips. Fugitive dust emissions are among the pollutants of greatest concern with respect to construction activities. General site grading operations are the primary sources of fugitive dust emissions, but these emissions can vary greatly, depending on the level of activity, the specific operations taking place, the number and types of equipment operated, vehicle speeds, local soil conditions, weather conditions, and the amount of earth disturbance. The project would involve site preparation, grading, building construction, and paving.

Annual project construction emissions (tons/year) were estimated using the California Emissions Estimator Model (CalEEMod). Annual construction emissions are presented in Table 3, below. Temporary emissions during project construction would not exceed SJVAPCD thresholds for any criteria pollutant. Impacts during project construction would be less than significant.

Table 3 Estimated Annual Construction Emissions

Year	Annual Emissions (tons/year)					
	ROG	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
2025	0.2	1.6	1.9	<0.1	0.2	0.1
2026	<0.1	<0.1	0.1	<0.1	<0.1	<0.1
Total Construction Emissions¹	0.3	1.6	2.0	<0.1	0.2	0.1
SJVAPCD Significance Threshold	10	10	100	27	15	15
Exceeds Threshold?	No	No	No	No	No	No

Numbers may not add up due to rounding.

See Appendix A for CalEEMod worksheets.

tons/year = tons per year; NO_x= Nitrous Oxides; ROG = Reactive Organic Gases; PM₁₀ = Particulate matter with a diameter of 10 microns or less; PM_{2.5} = Particulate Matter with a diameter of 2.5 microns or less; CO = carbon monoxide; SO_x = sulfur oxide

Current air quality in the SJVAB is the result of cumulative emissions from motor vehicles, off-road equipment, commercial and industrial facilities, and other emission sources. Proposed projects that emit these pollutants or their precursors (i.e., ROG and NO_x for ozone) potentially contribute to poor air quality. Project construction activities would remain below SJVAPCD’s recommended 100 pounds per for any of the criteria air pollutants, ensuring that State and federal ambient air quality standards are not exceeded. This data is shown in Table 4 below. Therefore, the project would have a less than significant impact with respect to daily construction emissions.

Table 4 Maximum Daily Construction Emissions

	Emissions (lbs/day) by year					
	ROG	NO _x	CO	SO _x	PM ₁₀ ¹	PM _{2.5} ¹
2025	6	56	52	<1	13	7
2026	4	11	15	<1	1	1
Maximum Emissions						
Maximum Daily Emissions	6	56	52	<1	13	7
Threshold	100	100	100	100	100	100
Exceed Threshold?	No	No	No	No	No	No

¹Includes compliance with Rule 8021 dust control measures, which accounts for watering.

Bold values indicate where thresholds are exceeded.

Numbers may not add up due to rounding.

See Appendix A for CalEEMod worksheets.

lbs/day = pounds per day; NO_x= Nitrous Oxides; ROG = Reactive Organic Gases; PM₁₀ = Particulate matter with a diameter of 10 microns or less; PM_{2.5} = Particulate Matter with a diameter of 2.5 microns or less; CO = carbon monoxide; SO_x = sulfur oxide

Project Operation

The project’s long-term operational emissions are those attributed to vehicle trips (mobile emissions), energy consumption, and landscape maintenance equipment (area source emissions). CalEEMod was used to calculate emissions based on the proposed land uses for the project site and the number of trips generated. The information in Table 5 indicates that the project would not exceed SJVAPCD significance thresholds for ozone, PM₁₀, or PM_{2.5}, the three criteria pollutants for which the SJVAB is in non-attainment, or for other criteria pollutants. Table 6 also demonstrates that daily operational emissions would not exceed SJVAPCD’s daily thresholds.

Table 5 Estimated Annual Operational Emissions

	Annual Emissions (tons/year)					
	ROG	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Area	0.2	<0.1	0.2	<0.1	<0.1	<0.1
Energy	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1
Mobile	0.2	0.2	1	<0.1	0.2	<0.1
Total Project Emissions¹	0.4	0.2	1.2	<0.1	0.2	<0.1
SJVAPCD Significance Threshold	10	10	100	27	15	15
Exceeds Threshold?	No	No	No	No	No	No

Numbers may not add due to rounding.

See Appendix A for CalEEMod worksheets.

tons/year = tons per year; NO_x= Nitrous Oxides; ROG = Reactive Organic Gases; PM₁₀ = Particulate matter with a diameter of 10 microns or less; PM_{2.5} = Particulate Matter with a diameter of 2.5 microns or less; CO = carbon monoxide; SO_x = sulfur oxide

Table 6 Estimated Daily Operational Emissions

Source	Emissions (lbs/day)					
	ROG	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Combined Total Daily Operations	2.6	1.5	7.8	<1	1.6	<1
<i>SJVAPCD Operational Threshold</i>	<i>100</i>	<i>100</i>	<i>100</i>	<i>100</i>	<i>100</i>	<i>100</i>
Exceed Threshold?	No	No	No	No	No	No

Bold values indicate where thresholds are exceeded.
 Numbers may not add up due to rounding.
 See Appendix A for CalEEMod worksheets.
 lbs/day = pounds per day; NO_x= Nitrous Oxides; ROG = Reactive Organic Gases; PM₁₀ = Particulate matter with a diameter of 10 microns or less; PM_{2.5} = Particulate Matter with a diameter of 2.5 microns or less; CO = carbon monoxide; SO_x = sulfur oxide

Emissions generated by project operation would not exceed SJVAPCD significance thresholds. Therefore, project emissions would not violate air quality standards or contribute to existing violations. This impact would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

c. *Would the project expose sensitive receptors to substantial pollutant concentrations?*

Toxic Air Contaminants

Generation of diesel particulate matter (DPM) from construction projects typically occurs in a single area for a short period of time. Proposed project components would be constructed over a period of approximately 13 months. Construction of the proposed project would require the use of heavy-duty construction equipment and diesel trucks which would temporarily emit DPM. Exposure to localized concentrations of TACs was assessed qualitatively based on the project’s potential to result in increased exposure of sensitive receptors to new or existing TAC emission sources. Sensitive receptors in the vicinity of the project site include single-family residences approximately 520 feet north and single-family residences directly east of the project site.

The dose to which the receptors are exposed is the primary factor used to determine health risk. Dose is a function of the concentration of a substance or substances in the environment and the extent of exposure that person has to the substance. Dose is positively correlated with time, meaning that a longer exposure period would result in a higher exposure level for the Maximally Exposed Individual. The risks estimated for a maximally exposed individual are higher if a fixed exposure occurs over a longer period of time. According to the California Office of Environmental Health Hazard Assessment, health risk assessments, which determine the exposure of sensitive receptors to toxic emissions, should be based on a 30-year exposure period (assumed to be the approximate time that a person spends in a household). The California Office of Environmental Health Hazard Assessment recommends this risk be bracketed with 9-year and 70-year exposure periods. Health risk assessments should be limited to the period/duration of activities associated with a proposed project.

The maximum PM_{2.5} emissions, which are used to represent DPM emissions for this analysis, would occur during the site preparation construction phase. While site preparation emissions represent the worst-case condition, such activities would only occur for 15 days, which is less than one percent of the 30-year and 70-year health risk calculation periods. In addition, construction activities would also be required to comply with California regulations limiting the idling of heavy-duty

construction equipment to no more than five minutes, which would reduce nearby sensitive receptors' exposure to temporary and variable DPM emissions. Furthermore, TAC emissions at any given sensitive receptor along the proposed project site would occur for only a limited portion of the overall construction timeframe because project construction would progress along the project site, further limiting the exposure of any proximate individual sensitive receptors to TAC emissions from active construction. Therefore, DPM generated by project construction is not expected to create conditions where the probability that the Maximally Exposed Individual would contract cancer is greater than the SJVAPCD's 10 in one million threshold or chronic and acute hazard index greater than 1.0 threshold. As such, project construction would have a less than significant impact involving the exposure of sensitive receptors to substantial TAC concentrations.

According to SJVAPCD's GAMAQI (2015a), land use projects that would place new toxic sources in the vicinity of existing receptors, and land use projects that would place new receptors in the vicinity of existing toxic sources, are considered the two types of projects with potential to cause long-term health risk impacts. The proposed office and shop operations of the project are not listed as a source of toxic air emissions (SJVAPCD 2015a), and the project would not place new sensitive receptors in the vicinity of toxic sources. The project would not result in the emission of substantial pollutant concentrations during project construction and operation, as discussed in Threshold b. Impacts regarding the exposure of sensitive receptors to substantial pollutant concentrations would be less than significant.

Carbon Monoxide Hotspots

A CO hotspot is a localized concentration of CO that is above a CO ambient air quality standard. Localized CO hotspots can occur at intersections with heavy peak hour traffic. Specifically, hotspots can be created at intersections where traffic levels are sufficiently high such that the local CO concentration exceeds the federal one-hour standard of 35.0 parts per million (ppm) or the federal and state eight-hour standard of 9.0 ppm.

The entire SJVAB is in conformance with state and federal CO standards and no air quality monitoring stations report CO levels in SJVAPCD jurisdiction. Additionally, CARB no longer reports CO concentrations anywhere in California. Based on the low background level of CO in the SJVAB (indicated by the lack of monitoring at state or local levels), the low and the ever-improving emissions standards for new sources in accordance with state and federal regulations, and the fact that the project would result in approximately two worker visits up to twice per week, during operational and maintenance activities. The proposed project is consistent with the City of Clovis General Plan land use designation. Consequently, potential vehicle trips from the project are already accounted for in the City's LOS calculations. Therefore, the project would not cause the LOS on affected roadways to be reduced to LOS E or F and would not substantially worsen an existing LOS F roadway. Therefore, the project would not create new CO hotspots. Additionally, as demonstrated under Threshold 3b, CO emissions during construction and operation, including mobile sources, would not exceed ambient air quality standards. Therefore, the project would not expose sensitive receptors to substantial CO concentrations, and localized air quality impacts related to CO hot spots would be less than significant.

Valley Fever

Construction activities that include ground disturbance can result in fugitive dust, which can cause fungus *Coccidioides* spores to become airborne if they are present in the soil. These spores can cause Valley Fever. Workers who disturb soil where fungal spores are found, whether by digging,

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operating earthmoving equipment, driving vehicles, or by working in dusty, wind-blown areas, are more likely to breathe in spores and become infected. It is not a contagious disease and secondary infections are rare. The project is located in Fresno County where 448 cases were reported in 2022 (CDPH 2023). Project construction would include ground-disturbing activities that could increase potential for exposure of nearby residents and on-site workers to airborne spores, if they are present. Compliance with dust control measured required by SJVAPCD Rule 8021 would minimize personnel and public exposure to Valley Fever and reduce the potential risk of nearby resident and on-site worker exposure to Valley Fever. Additionally, the project site is in a commercial and residential area where exposure risks to Valley Fever are lower due to less exposed dry soils when compared to risks associated with the development of undisturbed rural and agricultural land (Center for Disease Control 2024). Therefore, impacts associated with Valley Fever would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

- d. Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?*

Construction activities would potentially generate odors from vehicle exhaust and fumes from fuel combustion. Construction-related odors would be temporary and would cease upon completion. As the project site is in an area without tall buildings to block air movement and hold odors, construction-related odors would disperse and dissipate and would not cause substantial odors at the closest sensitive receptors, which include single-family residences approximately 520 feet north and single-family residences directly east of the project site. Impacts regarding odor creation during project construction would be less than significant.

The project would involve the operation of several administrative educational buildings, which are not listed as a potential odor-generating sources according to the SJVAPCD’s GAMAQI (2015a). As a result, impacts regarding odor creation during project operation would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

4 Biological Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than - Significant Impact	No Impact
Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

A Biological Resource Evaluation (BRE) was prepared by Odell Planning and Research, dated November 7, 2022. The 2022 BRE provided existing conditions information for all phases of the project and provided an impact analysis specific for Phase I. The 2022 BRE determined that Phase I would have a less than significant impact on special-status species, and that the project would have

a less than significant impact with mitigation regarding wildlife movement. The 2022 BRE also determined the project would have no impact regarding riparian habitat, sensitive natural communities, wetlands, or conflict with biological resource policies.

Rincon biologists conducted a field reconnaissance survey within the Biological Study Area (Study Area) to confirm existing conditions described in the 2022 BRE. The Study Area for this project (Phase II) is defined as the limits of disturbance, including all grading and vegetation removal activities plus a 100-foot buffer surrounding the project site. Potential aquatic breeding habitats within 1.25-mile of the project site were also reviewed to determine the project site's potential to support upland habitat for aquatic species. The field reconnaissance survey was conducted on July 17, 2024 to examine existing site conditions, presence/absence of special status species, and any changes to the site from the Phase I BRE. Weather conditions during the survey were sunny, with temperature ranging from 77-91 degrees Fahrenheit, wind 4-5 miles per hour, and zero inches of precipitation. The results of the Phase II survey are presented in this IS-MND.

Environmental Setting

The project site is bordered by commercial areas to the north and west, and residences to the east and south. Review of historical aerial imagery indicates the site has been previously used for agriculture and has had continuous routine tilling. The project site is largely bare ground and maintains limited vegetative cover, although some ruderal species such as yellow star thistle (*Centaurea solstitialis*), pigweed (*Amaranthus* sp.), Russian thistle (*Salsola kali*), Spanish clover (*Acmispon americanus*), and Bermuda grass (*Cynodon dactylon*) were observed. The site does not support any vegetative communities as described in Manual of California Vegetation (CNPS 2024).

No wildlife species were observed within the project site during the field reconnaissance survey. Species observed within the greater Study Area included common raven (*Corvus corax*), California scrub jay (*Aphelocoma californica*), northern mockingbird (*Mimus polyglottos*), mourning dove (*Zenaida macroura*), and California ground squirrel (*Otospermophilus beecheyi*). Several ground squirrel burrows were observed within the project site. The undeveloped parcel adjacent to the northwest side of the project site has been tilled and maintains California ground squirrel burrows.

Impact Analysis

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

Queries of the United States Fish and Wildlife Service (USFWS) Information for Planning and Consultation system (IPaC) (UFWS 2024a), California Department of Fish and Wildlife (CDFW) California Natural Diversity Database (CNDDDB) (CDFW 2024a), and California Native Plant Society (CNPS) online Inventory of Rare and Endangered Plants of California (CNPS 2024) were conducted to obtain comprehensive information regarding State and federally listed species, and other special status species, considered to have potential to occur within the *Clovis, California* USGS 7.5-minute topographic quadrangle and the surrounding eight quadrangles (Lanes Bridge, Friant, Academy, Fresno North, Round Mountain, Fresno South, Malaga, and Sanger). The final list of special status biological resources (species and sensitive natural communities) was evaluated based on documented occurrences within the nine-quadrangle search area and biologists' expert opinions on

species known to occur in the region. The evaluation results and justification were compiled into a table, provided as Appendix B.

The following resources were reviewed for additional information on existing conditions relating to biological resources within the project site and surrounding area:

- USFWS Critical Habitat Portal (USFWS 2024b)
- CDFW Biogeographic Information and Observation System (CDFW 2024b)
- CDFW Special Vascular Plants, Bryophytes, and Lichens List (CDFW 2024c)
- CDFW Special Animals List (CDFW 2024d)
- California Essential Habitat Connectivity Project (CDFW 2024e)

The desktop analysis identified 43 special status animal species and 17 special status plant species that have occurred within the nine-quadrangle search area as defined by CNDDDB (CDFW 2024a), CNPS Online Inventory of Rare and Endangered Plants of California (CNPS 2024), and USFWS IPaC (USFWS 2024a).

The project site is disturbed and surrounded by commercial and residential areas, and thus does not support special status and wildlife taxa recognized on the CNPS Online Inventory of Rare and Endangered Plants of California (CNPS 2024) and the CDFW State and Federally Listed Endangered, Threatened, And Rare Plants of California (CDFW 2024c). No natural plant communities occur within the project site. The site is mostly void of vegetation, although some ruderal species such as yellow star thistle, pigweed, Russian thistle, Spanish clover, and Bermuda grass were observed. Of the 17 special status plant species that have been documented in the reviewed quadrangle maps, none were found within the project site. Although the site survey was not conducted at the peak blooming period for some special status plants that have been documented in the reviewed quadrangle maps, these plant species are not likely to occur on-site due to the project site's current conditions and active construction. Therefore, the project would not impact any special-status plant species.

No special status wildlife species or signs of such species were observed during the site visit. Some ground squirrel burrows were scattered on the site and the adjacent parcel to the northwest could provide suitable nesting habitat for burrowing owls (*Athene cunicularia*) but the high level of urbanized activity (e.g., noise, traffic), lack of presence or signs detected during the site visit, and the lack of local occurrences make the presence of the burrowing owl unlikely, with the closest known occurrence being approximately four miles to the south (recorded in 1962) (CDFW 2024b).

Due to the highly disturbed habitat of the project site, lack of vegetative habitat, and current construction of Phase I immediately to the west of the site, the presence of northern California legless lizard (*Anniella pulchra*), blunt-nosed leopard lizard (*Gambelia sila*), coast horned lizard (*Phrynosoma blainvillii*), and California glossy snake (*Arizona elegans occidentalis*) is unlikely. No valley elderberry shrubs were observed on the project site; thus, the valley elderberry longhorn beetle (*Desmocerus californicus dimorphus*) is not present. There are no tree groves present on the project site or surrounding vicinity that could support the overwintering monarch butterfly (*Danaus plexippus*); thus, the species is unlikely to occur.

There is no grassland, shrub, or flowering plant habitat that could support the Crotch bumble bee (*Bombus crotchii*). The closest known occurrences of the Crotch bumble bee are approximately two miles to the west of the project site from 1899 (CDFW 2024b) and 7.5 miles to the west from 2019 (iNaturalist 2024). Historically the site has been used for agriculture and has undergone routine

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tilling, removing potential for Crotch bumble bee habitat and food plants. The site is mostly void of vegetation, under active construction of Phase I, and does not contain good foraging habitat for any bumblebee species. Crotch bumble bee food plants include milkweed, dustymaidens, lupines, medics, phacelias, and sage (Hatfield et al. 2015), which were not present in the project site. The field reconnaissance survey was conducted during adequate weather and seasonal timing to detect presence of the Crotch bumble bee; however, no bumble bee species (*Bombus* sp.) were detected during the survey; therefore, the species is unlikely to occur.

There are no vernal pools, wetlands, or aquatic habitat within the project site. Review of nearby potential aquatic breeding habitat determined the site is unlikely to support upland shelter habitat for amphibians and aquatic reptiles. The nearest aquatic habitat is a water basin approximately 0.3 mile north of the project site and passage to the project site is hindered by commercial development, SR 168, and Herndon Avenue. Five additional water basins exist within 1.25-mile radius of the project site; however, dispersal to the project site is hindered by residential development, commercial development, and transportation infrastructure. Therefore, amphibians and aquatic reptiles are unlikely to occur in the project site and Study Area.

There are no known occurrences of pallid bat (*Antrozous pallidus*), spotted bat (*Euderma maculatum*), or western mastiff bat (*Eumops perotis californicus*) within a five mile radius of the project site (CDFW 2024b). The project site is void of natural roosting habitat and lacks foraging opportunities given the level of disturbance and lack of vegetation. The current level of disturbance of the project site from Phase I construction and the surrounding area of residential, commercial, and transportation infrastructure make these bat species unlikely to occur.

The closest known occurrence of Fresno kangaroo rat (*Dipodomys nitratooides exilis*) is approximately nine miles west of the project site from 1898 (CDFW 2024b). There are no other known occurrences within a 15-mile radius of the project site (CDFW 2024b). The project site is not identified as suitable habitat in the Fresno Kangaroo Rat Predicted Habitat dataset, which maps areas of suitable habitat within the species range based on California Wildlife Habitat Relationships and a statewide best-available vegetation map (CDFW 2016). The closest known occurrence of San Joaquin kit fox (*Vulpes macrotis mutica*) is approximately ten miles north of the project site (CDFW 2024b). There are no other known occurrences within a ten-mile radius of the project site (CDFW 2024b). The project site is outside the range of the kit fox Predicted Habitat. The project site been historically disturbance through agriculture and routine tilling and is under active construction with Phase I. Due to the lack of suitable habitat, high level of disturbance, and lack of known presence within and adjacent to the project site, Fresno kangaroo rat and San Joaquin kit fox do not have potential to occur on the project site. The American badger (*Taxidea taxus*) has been previously detected three miles from the project site (CDFW 2024b). However, the project site's current condition does not provide suitable habitat, and the species is unlikely to occur.

The project site is highly disturbed, under active construction, and lacks suitable nesting habitat for bird species not adapted to urban environments. Uncommon or special-status migratory birds have potential to pass over the project site but would not be impacted by project activities. The project site could provide nesting habitat for common ground nesting species that are adapted to urban environments. Ornamental trees and shrubs along the eastern and southern boundaries within adjacent residential areas could also provide nesting habitat for common species that are adapted to urban environments. While urban activities such as noise, traffic, and domestic pets make the presence of uncommon or special-status migratory birds unlikely, there is still potential for nesting activity in the adjacent ornamental trees and shrubs and within the Study Area.

The nesting season generally extends from February 1 through August 31 in California but can vary based upon annual climatic conditions. Thus, construction activities could result in direct impacts to active nests during ground disturbance, or disturbance-related nest abandonment. Impacts to most common bird species through nest destruction or abandonment would be a violation of California Fish and Game Code and the Migratory Bird Treaty Act and would constitute a potentially significant impact. However, implementation of Mitigation Measure BIO-1 would reduce potential impacts by ensuring protection of nesting birds that may be on-site during project activities. With implementation of Mitigation Measure BIO-1, impacts would be less than significant.

Mitigation Measure

BIO-1 Nesting Birds

Project construction shall be conducted outside of the nesting season (September 15 to January 31) to the extent feasible. If vegetation removal, grading, or initial ground-disturbing activities are conducted during the nesting season, a qualified biologist shall conduct a preconstruction nesting bird survey no more than ten days prior to initial ground disturbance. Nesting habitat may include shrubs, trees and snags located in the adjacent surrounding neighborhood, as well as open ground within the project site. The survey shall include all potential nesting habitat in the project area and within 300 feet of the proposed project grading boundaries to identify the location and status of any nests that could potentially be affected by project activities. The biologist shall submit a report of the preconstruction nesting bird survey to CUSD to document compliance within 30 days of survey completion.

If active nests of protected species are found within project impact areas or within 250 feet of project impact areas, the biologist shall establish a work exclusion zone around each nest that shall be followed by the contractor. Established exclusion zones shall remain in place until all young in the nest have fledged or the nest otherwise becomes inactive (e.g., due to predation). Appropriate exclusion zone sizes vary dependent upon bird species, nest location, existing visual buffers, ambient sound levels, and other factors. The qualified biologist shall consider these factors and determine the appropriate exclusion zone distance. An exclusion zone radius may be as small as 25 feet (for common, disturbance-adapted species) or as large as 250 feet or more for raptors. Exclusion zone size may also be reduced from established levels if supported with nest monitoring by a qualified biologist indicating that work activities outside the reduced radius are not adversely impacting the nest. The biologist shall submit a report of the success of the exclusion zone to CUSD to document compliance within 30 days of completion of project construction.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

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

There are no aquatic resources, marshes, ponds, wetlands, riparian habitat, or sensitive natural communities within the project site. A search of the USFWS IPaC system concluded that the project site does not contain critical habitat (USFWS 2024a). Therefore, the project would not have a substantial adverse effect on riparian habitat or sensitive natural communities. No impact would occur.

NO IMPACT

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- c. *Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?*

There are no State or federally protected wetlands, marshes, or vernal pools present within the project site. A search of the USFWS National Wetlands Inventory concluded that the project site does not contain federally protected wetlands (USFWS 2024c). Therefore, the project would not have a substantial adverse effect on wetlands. No impact would occur.

NO IMPACT

- d. *Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?*

The project site and surrounding vicinity are not identified as Essential Connectivity Areas by CDFW (CDFW 2024e). The site does not constitute a movement corridor for native wildlife. The project site is bordered by commercial and residential development, which restrict access to wildlife. Smaller wildlife species and birds are not expected to be further inhibited by the project. Therefore, the project would not interfere with the movement of any fish or wildlife species or impede the use of native wildlife nursery sites. Impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

- e. *Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?*

Chapter 9.30, Tree Protection Standards, of the CMC establishes regulations and standards to protect and manage trees and to ensure that any proposed development is compatible with and enhances the City's quality and character. However, there are no trees on the project site. Therefore, the project would have no impact involving conflict with local policies or ordinances that protect biological resources, such as a tree preservation ordinance.

NO IMPACT

- f. *Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?*

The project site is not within the boundaries of a habitat conservation plan, a natural community conservation plan, or other approved local, regional, or state habitat conservation plan (CDFW 2024f). Therefore, the project would have no impact involving conflict with a habitat conservation plan, a natural community conservation plan, or other approved local, regional, or state habitat conservation plan.

NO IMPACT

5 Cultural Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than - Significant Impact	No Impact
Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

ASM Affiliates conducted a Phase I cultural resources survey in November 2022 and prepared a report dated March 2023 for the overall 16.6 acre Phase I site. The report included a California Historical Resources Information System (CHRIS) records search through the Southern San Joaquin Valley Information Center; a Native American Heritage Commission (NAHC) Sacred Lands File (SLF) search; background research including in-depth review, archival, academic, and ethnographic information; a cultural resources pedestrian survey of the project site; an analysis of the sensitivity of the project site to contain cultural resources; as well as management recommendations. The setting and impact analysis, which are inclusive of the Phase II project site, are summarized based on the results of this report.³

a. *Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?*

On October 31, 2022, the Southern San Joaquin Valley Information Center provided records search results to identify previously recorded cultural resources within the project site and a 0.5-mile radius surrounding it. The CHRIS records search did not identify any recorded resources within the project site. Three recorded resources in the 0.5-mile radius were identified, consisting of off-site historic-era single family residences. Project construction and operation would be limited to the project site; therefore, the project would not result in the substantial adverse change in the significance of a historical resource pursuant to §15064.5. There would be no impact.

NO IMPACT

³ The report contains sensitive and confidential information concerning archaeological sites and is therefore held confidential not for public distribution. Archaeological site locations are exempt from the California Public Records Act, as specified in Government Code 6254.10, and from the Freedom of Information Act (Exemption 3), under the legal authority of both the National Historic Preservation Act (PL 102-574, Section 304[a]) and the Archaeological Resources Protection Act (PL 96-95, Section 9[a]).

- b. *Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?*

No archaeological resources were identified within the project site during the CHRIS records search or Phase I cultural resources survey conducted by ASM Affiliates in November 2022. The NAHC SLF request was returned with negative results via a letter dated November 2022. As discussed in Environmental Checklist Section 18, *Tribal Cultural Resources*, AB 52 notification letters were sent to tribes listed in the NAHC SLF letter. Only one tribal response was received, from the Santa Rosa Rancheria Tachi-Yokut Tribe, which deferred to tribes more local to the project site. Given the negative records search results, the project site was identified to have low archaeological sensitivity and a low potential for encountering subsurface archaeological resources. However, it is possible that unanticipated archaeological deposits could be encountered and damaged during the ground-disturbing activities associated with construction (such as grading and excavation), especially if those activities occur in less-disturbed buried sediments. This impact would be potentially significant. Implementation of Mitigation Measure CUL-1 would ensure adequate procedures are followed in case of unanticipated discovery, reducing potential impacts to archaeological resources to a less than significant level.

Mitigation Measure

CUL-1 Unanticipated Discovery of Archaeological Resources

In the event that archaeological resources are encountered during ground-disturbing activities, work within 50 feet of the find shall be halted and an archaeologist meeting the Secretary of the Interior's Professional Qualification Standards for archeology (National Park Service 1983) shall be contacted immediately to evaluate the find. If the find is prehistoric, then a Native American representative shall also be contacted to participate in the evaluation of the find. CUSD shall consider the mitigation recommendations of the qualified archeologist. CUSD and the construction contractor shall consult and agree upon implementation of a measure or measures, such as avoidance, preservation in place, excavation, documentation, curation, data recovery, or other appropriate measures, that CUSD and the construction contractor deem feasible and appropriate. If the find is potentially eligible for listing in the California Register of Historical Resources (CRHR), evaluation may require the preparation of a treatment plan and archaeological testing. If the discovery proves to be eligible for listing in the CRHR and cannot be avoided by the project, additional work such as data recovery excavation may be warranted to mitigate any significant impacts to cultural resources to less than a significant level. CUSD shall review and approve the treatment plan and archeological testing as appropriate.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

- c. *Would the project disturb any human remains, including those interred outside of formal cemeteries?*

There are no known formal cemeteries at the project site. However, the possibility exists for previously unknown or yet identified human remains to be uncovered during project construction activities. In the event that human remains are inadvertently encountered during ground disturbing activities, they would be treated consistent with State and local regulations including California Health and Safety Code Section 7050.5, California Public Resources Code (PRC) Section 5097.98, and CCR Section 15064.5(e). In accordance with these regulations, if human remains are found, the County Coroner would be immediately notified of the discovery. No further disturbance would

occur until the County Coroner has made a determination of origin and disposition pursuant to PRC Section 5097.98. If the County Coroner determines that the remains are, or believed to be Native American origin, he or she is required to notify the NAHC, who in turn would notify those persons believed to be the most likely descendant (MLD). The MLD would have 48 hours from being granted site access to make recommendations for the disposition of the remains. If the MLD does not make recommendations within 48 hours, the landowner would reinter the remains in an area of the property secure from subsequent disturbance. With compliance to these existing regulatory requirements, the proposed project would have a less than significant impact on human remains.

LESS-THAN-SIGNIFICANT IMPACT

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6 Energy

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than - Significant Impact	No Impact
Would the project:				
a. Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

- a. *Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?*

As a state, California is one of the lowest per capita energy users in the United States, ranked 49th in the nation, due to its energy efficiency programs and mild climates (United States Energy Information Administration 2024). Electricity and natural gas are primarily consumed by the built environment for lighting, appliances, heating and cooling systems, fireplaces, and other uses such as industrial processes and transportation. Energy resources consumed by proposed project activities would primarily be petroleum fuels. Petroleum fuels are primarily consumed by on-road and off-road equipment in addition to some industrial processes, with California being one of the top petroleum-producing states in the nation (United States Energy Information Administration 2024). Gasoline, which is used by light-duty cars, pickup trucks, and other vehicles, is the most used transportation fuel in California with 11.5 billion gallons sold in 2022 (CEC 2024). Diesel, which is used primarily by heavy-duty trucks, delivery vehicles, buses, trains, ships, boats and barges, farm equipment, and heavy-duty construction and military vehicles, is the second most used fuel in California with 3.0 billion gallons sold in 2022 (CEC 2024).

Construction Energy Consumption

Energy use during project construction would be primarily in the form of fuel consumption to operate heavy equipment, light-duty vehicles, machinery, and construction worker travel to and from the project site. Energy use would be typical of similar-sized construction projects in the region. Furthermore, the proposed project would utilize construction contractors who demonstrate compliance with the provisions of the CCR Title 13 Sections 2449 and 2485, which restrict the idling of heavy-duty diesel vehicles and govern the accelerated retrofitting, repowering, or replacement of heavy-duty diesel on- and off-road equipment. Further, in the interest of both environmental awareness and cost efficiency, construction contractors would not reasonably be expected to utilize fuel in a manner that is wasteful or unnecessary. As such, construction would not result in wasteful, inefficient, or unnecessary consumption of energy resources during construction. This impact would be less than significant.

Operational Energy Consumption

Project operation would consume electricity. However, new development would be subject to the energy conservation requirements of the California Energy Code (CCR Title 24, Part 6, California's Energy Efficiency Standards for Residential and Nonresidential Buildings) and the California Green Building Standards Code (CCR Title 24, Part 11). The California Energy Code provides energy conservation standards for all new and renovated commercial and residential buildings constructed in California. The California Energy Code applies to the building envelope, space-conditioning systems, and water-heating and lighting systems of buildings and appliances and provides guidance on construction techniques to maximize energy conservation. Minimum efficiency standards are given for a variety of building elements, including appliances; water and space heating and cooling equipment; and insulation for doors, pipes, walls, and ceilings. The California Energy Code emphasizes saving energy at peak periods and seasons and improving the quality of installation of energy efficiency measures. The California Green Building Standards Code sets targets for energy efficiency; water consumption; dual plumbing systems for potable and recyclable water; diversion of construction waste from landfills; and use of environmentally sensitive materials in construction and design, including ecofriendly flooring, carpeting, paint, coatings, thermal insulation, and acoustical wall and ceiling panels. Furthermore, each of the four proposed buildings would include rooftop photovoltaic systems, which would offset energy consumption that derives from fossil fuels. Operation of the proposed project would not result in the wasteful, inefficient, or unnecessary consumption of energy resources and this impact would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

b. Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

The project would involve the expansion of CUSD offices and administration buildings. The City has several policies in place to reduce emissions related to energy consumption from area sources and promote renewable energy. Open Space and Conservation Element policies include (City of Clovis 2014a):

Policy 3.5: Energy and Water Conservation. Encourage new development and substantial rehabilitation projects to exceed energy and water conservation and reduction standards set in the California Building Code.

Policy 3.6: Renewable Energy. Promote the use of renewable and sustainable energy sources to serve public and private sector development

Policy 3.7: Construction and Design. Encourage new construction to incorporate energy efficient building and site design strategies.

As described in threshold 6a, the project would be required to adhere to the CCR Title 24, Part 6 which sets requirements for California's Energy Efficiency Standards for non-residential buildings. As such, the proposed project would adhere to design standards that govern indoor/outdoor lighting, mechanical systems, solar, electrical power distribution, among other features. Therefore, the project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency, and this impact would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

7 Geology and Soils

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than - Significant Impact	No Impact
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Would the project:

a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
1. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2. Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3. Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4. Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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- a.1. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?*

The project site is located within the Great Valley geomorphic province, one of eleven major provinces in California (California Geological Survey [CGS] 2002). These provinces are “naturally defined geologic regions that display a distinct landscape or landform” (CGS 2002). The Great Valley is an alluvial plain approximately 50 miles wide and 400 miles long. It begins in the Sacramento Valley in the north and extends through the southern part of the San Joaquin Valley. The city of Clovis is not located in an Alquist-Priolo Fault Zone and there are no active faults present in the city of Clovis (CGS 2022; City of Clovis 2014b). The project site is not transected, partially or fully, by any Alquist-Priolo earthquake fault zones. Therefore, there is no risk of rupture of a known earthquake fault, and no impact would occur.

NO IMPACT

- a.2. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?*
- a.3. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?*

Areas of the San Joaquin Valley in Fresno County are not conducive to liquefaction due to soil types that are either too coarse or too high in clay content (City of Clovis 2014b). The topography at the project is flat and does not exhibit an elevation that would be conducive to landslide activity.

As discussed under threshold 7a.1, there are no active faults in the city of Clovis. In the event of rupture of a regional fault, such as the San Andreas Fault, the project site may experience seismic ground shaking. The potential for geologic hazards to cause substantial adverse effects due to ground shaking would be addressed through mandatory compliance with the 2022 California Building Code (CBC) seismic design provisions. The 2022 CBC incorporates the latest seismic design standards for structural loads and materials, as well as provisions from the National Earthquake Hazards Reduction Program, to mitigate losses from an earthquake and provide the latest provisions to ensure earthquake safety. The earthquake design requirements of the CBC consider the occupancy category of the structure, site class, soil classifications, and various seismic coefficients. The CBC provides standards for various aspects of construction, including but not limited to excavation, grading, earthwork, construction, site preparation, fill placement, retaining wall design, and foundation design. While the proposed project may be susceptible to some seismic-related hazards, the proposed project would be required to minimize this risk, to the extent feasible, through incorporation of applicable CBC standards. Therefore, with conformance to the CBC, impacts involving the potential for fault rupture, ground shaking, or liquefaction to result in substantial adverse effects would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

- a.4. *Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?*

The project site exhibits a flat topography that is not susceptible to landslides. Therefore, the proposed project would not expose people or structures to potential substantial adverse effects involving landslides. There would be no impact.

NO IMPACT

- b. *Would the project result in substantial soil erosion or the loss of topsoil?*

The proposed project involves construction and grading activities that could result in soil erosion. Soil erosion can also be caused by strong wind and/or earth-moving operations during construction. This would be minimized through compliance with the National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges associated with construction and land disturbance activities (Construction General Permit), enforced through Order 2022-0057-DWQ. In order to obtain a Construction General Permit, a Storm Water Pollution Prevention Plan (SWPPP) must be developed. A SWPPP includes measures that ensure that all pollutants and their sources are controlled, and best management practices (BMPs) are followed, including those related to soil erosion. Such BMPs may include but would not be limited to the use of temporary de-silting basins, construction vehicle maintenance in staging areas to avoid leaks, and installation of erosion control blankets. The construction SWPPP and BMPs would be designed to prevent sedimentation of both on-site and off-site surface waters from construction activities. Upon completion of the proposed project, the new facilities would not include components or activities that would result in ongoing erosion or loss of topsoil such as steep slopes or routine ground disturbance. Therefore, the proposed project would not result in substantial soil erosion or the loss of topsoil, and impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

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

The proposed project involves the expansion of CUSD facilities on former agricultural land, surrounded by existing development. Although project buildings and occupants could be exposed to seismic hazards, the project is not anticipated to adversely affect soil stability or increase the potential for local or regional landslides, subsidence, liquefaction, or collapse. As discussed previously, the project site is in an area not prone to liquefaction hazards (City of Clovis 2014b). The project site is flat and thus there is no potential for landslides to occur. Therefore, the proposed project would not exacerbate hazards related to unstable soil and would not result in on- or off-site landslides, lateral spreading, subsidence, liquefaction, or collapse. Impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

- d. *Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?*

Expansive soils are soils that shrink and swell as a result of moisture changes. Expansive soils typically exhibit a high percentage of clay in their overall composition. The project site contains three types of mapped soil units: Ramona sandy loam, Ramona sandy loam - hard substratum, and

San Joaquin loam. All soils located on the project site contain less than ten percent clay and are primarily composed of sand and loamy sand (United States Department of Agriculture 2024). These types of soils are not typically associated with expansive soil conditions, and soils with moderately high to high expansive potential are primarily located outside of the City limits (City of Clovis 2014b). Therefore, the project would not introduce risk to life or property as a result of expansive soils. No impact would occur.

NO IMPACT

- e. *Would the project 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?*

The project would not include or require the use of septic tanks or alternative wastewater disposal systems. On-site portable restroom facilities would be provided by the construction contractor for workers operating at the site. No impact would occur.

NO IMPACT

- f. *Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?*

Paleontological resources, or fossils, are the evidence of once-living organisms preserved in the rock record. They include both the fossilized remains of ancient plants and animals and the traces thereof (e.g., trackways, imprints, burrows). Paleontological resources are not found in “soil” but are contained within the geologic deposits or bedrock that underlies the soil layer. Typically, fossils are greater than 5,000 years old (i.e., older than middle Holocene in age) and are typically preserved in sedimentary rocks. Although rare, fossils can also be preserved in volcanic rocks and low-grade metamorphic rocks under certain conditions (Society of Vertebrate Paleontology [SVP] 2010). Fossils occur in a non-continuous and often unpredictable distribution within some sedimentary units, and the potential for fossils to occur within sedimentary units depends on several factors. It is possible to evaluate the potential for geologic units to contain scientifically important paleontological resources, and therefore evaluate the potential for impacts to those resources and provide mitigation for paleontological resources if they are discovered during construction of a development project.

Rincon evaluated the paleontological sensitivity of the geologic units that underlie the project site to assess the project’s potential for significant impacts to scientifically important paleontological resources. The analysis was based on the results of a review of existing information in the scientific literature regarding known fossils within geologic units mapped at the project site. According to the SVP (2010) classification system, geologic units can be assigned a high, low, undetermined, or no potential for containing scientifically significant nonrenewable paleontological resources. Following the literature review, a paleontological sensitivity classification was assigned to each geologic unit mapped within the project site. This criterion is based on rock units within which vertebrate or significant invertebrate fossils have been determined by previous studies to be present or likely to be present. The potential for impacts to significant paleontological resources is based on the potential for ground disturbance to directly impact paleontologically sensitive geologic units.

The project is located in the *Clovis, California* United States Geological Survey 7.5-minute topographic quadrangle. The geology of the region surrounding the project site was mapped by Matthews and Burnett (1965), who identified a single geologic unit, Pleistocene nonmarine

sediments, underlying the project site. Marchand and Allwardt (1978) mapped the region just north of the project site and split the areas mapped as Pleistocene nonmarine sediments by Matthews and Burnett (1965) into three distinct geologic units: Riverbank Formation, Modesto Formation, and Turlock Lake Formation. All three of these geologic units have produced scientifically significant paleontological resources in Fresno County (Jefferson 2010; Paleobiology Database 2024; University of California Museum of Paleontology 2024), so all three are considered to have high paleontological sensitivity. However, the project site has previously been used for agriculture, which likely disturbed the sediments within the project site to a depth of at least two feet. Disturbed sediments are not paleontologically sensitive. Therefore, the sediments underlying the project site are assumed to have no paleontological sensitivity from the surface to two feet below the surface and high paleontological sensitivity greater than two feet below the surface.

Ground-disturbing activities within previously undisturbed sediments with high paleontological sensitivity could result in significant impacts to paleontological resources. Impacts would be significant if construction activities result in the destruction, damage, or loss of scientifically important paleontological resources and associated stratigraphic and paleontological data. The proposed project would require grading for building foundations and trenching for new utility (e.g., sewer, water, storm drain) infrastructure. The depth of excavations for building pads is currently unknown, but the new utility infrastructure is anticipated to require excavations greater than five feet below the surface. Therefore, the project is anticipated to require excavations within sediments with high paleontological sensitivity and, therefore, may significantly impact paleontological resources.

Implementation of Mitigation Measure GEO-1 would reduce potential impacts to paleontological resources to a less than significant level by educating construction personnel on the appearance of paleontological resources; monitoring for paleontological resources; and, if discovered, recovering, identifying, and curating paleontological resources.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

GEO-1 Paleontological Resources Monitoring and Mitigation

Qualified Professional Paleontologist. Prior to excavation, CUSD shall retain a Qualified Professional Paleontologist, as defined by the SVP (SVP 2010), who shall direct all mitigation measures related to paleontological resources.

Paleontological Worker Environmental Awareness Program. Prior to the start of construction, the Qualified Professional Paleontologist or their designee shall conduct a paleontological Worker Environmental Awareness Program training for construction personnel regarding the appearance of fossils and the procedures for notifying paleontological staff should fossils be discovered by construction personnel.

Paleontological Monitoring and Salvage. Full-time paleontological monitoring shall be conducted during ground-disturbing construction activities within previously undisturbed sediments greater than two feet below the surface. Paleontological monitoring shall be conducted by a paleontological monitor with experience with collection and salvage of paleontological resources and who meets the minimum standards of the SVP (2010) for a Paleontological Resources Monitor.

The Qualified Professional Paleontologist may recommend that monitoring be reduced in frequency or ceased entirely based on geologic observations. Such decisions shall be subject to review and approval by CUSD. In the event of a fossil discovery by the paleontological monitor or construction personnel, all construction activity within 50 feet of the find shall cease, and the Qualified

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Professional Paleontologist shall evaluate the find. If the fossil(s) is (are) not scientifically significant, then construction activity may resume. If it is determined that the fossil(s) is (are) scientifically significant, the following shall be completed:

- **Fossil Salvage.** The paleontological monitor shall salvage (excavate and recover) the fossil to protect it from damage/destruction. Typically, fossils can be safely salvaged quickly by a single paleontological monitor with minimal disruption to construction activity. In some cases, larger fossils (such as complete skeletons or large mammal fossils) require more extensive excavation and longer salvage periods. Bulk matrix sampling may be necessary to recover small invertebrates or microvertebrates from within paleontologically sensitive deposits. After the fossil(s) is (are) salvaged, construction activity may resume.
- **Fossil Preparation and Curation.** Fossils shall be identified to the lowest (most-specific) possible taxonomic level, prepared to a curation-ready condition, and curated in a scientific institution with a permanent paleontological collection along with all pertinent field notes, photos, data, and maps. Fossils of undetermined significance at the time of collection may also warrant curation at the discretion of the Qualified Professional Paleontologist.

Final Paleontological Mitigation Report. Upon completion of ground-disturbing activities (or laboratory preparation and curation of fossils, if necessary), the Qualified Professional Paleontologist shall prepare a final report describing the results of the paleontological monitoring efforts. The report shall include a summary of the field and laboratory methods employed; an overview of project geology; and, if fossils were discovered, an analysis of the fossils, including physical description, taxonomic identification, and scientific significance. The report shall be submitted to CUSD and, if fossil curation occurred, the designated scientific institution.

8 Greenhouse Gas Emissions

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than - Significant Impact	No Impact
Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Climate Change and Greenhouse Gases

Climate change is the observed increase in the average temperature of the Earth’s atmosphere and oceans along with other substantial changes in climate (such as wind patterns, precipitation, and storms) over an extended period. The term “climate change” is often used interchangeably with the term “global warming,” but climate change is preferred because it conveys that other changes are happening in addition to rising temperatures. The baseline against which these changes are measured originates in historical records that identify temperature changes that occurred in the past, such as during previous ice ages. The global climate is changing continuously, as evidenced in the geologic record which indicates repeated episodes of substantial warming and cooling. The rate of change has typically been incremental, with warming or cooling trends occurring over the course of thousands of years. The past 10,000 years have been marked by a period of incremental warming, as glaciers have steadily retreated across the globe. However, scientists have observed acceleration in the rate of warming over the past 150 years. The United Nations Intergovernmental Panel on Climate Change (IPCC) expressed a high degree of confidence (95 percent or greater chance) that the global average net effect of human activities has been the dominant cause of warming since the mid-twentieth century.

Gases that absorb and re-emit infrared radiation in the atmosphere are called greenhouse gases (GHGs). The gases widely seen as the principal contributors to human-induced climate change include carbon dioxide (CO₂), methane (CH₄), nitrous oxides (N₂O), fluorinated gases such as hydrofluorocarbons and perfluorocarbons, and sulfur hexafluoride (SF₆). Water vapor is excluded from the list of GHGs because it is short-lived in the atmosphere, and natural processes, such as oceanic evaporation, largely determine its atmospheric concentrations.

Different types of GHGs have varying global warming potentials (GWP). The GWP of a GHG is the potential of a gas or aerosol to trap heat in the atmosphere over a specified timescale (generally, 100 years). Because GHGs absorb different amounts of heat, a common reference gas (CO₂) is used to relate the amount of heat absorbed to the amount of the gas emitted, referred to as “carbon dioxide equivalent” (CO₂e), and is the amount of GHG emitted multiplied by its GWP.

The accumulation of GHGs in the atmosphere regulates the earth's temperature. However, emissions from human activities, particularly the consumption of fossil fuels for electricity production and transportation, are believed to have elevated the concentration of these gases in the atmosphere beyond the level of concentrations that occur naturally.

Greenhouse Gas Emissions Inventory

Worldwide anthropogenic emissions of GHGs were approximately 46,000 million metric tons (MMT or gigaton) CO₂e in 2010 (IPCC 2014). Carbon dioxide emissions from fossil fuel combustion and industrial processes contributed about 65 percent of total emissions in 2010. Of anthropogenic GHGs, carbon dioxide was the most abundant, accounting for 76 percent of total 2010 emissions. Methane emissions accounted for 16 percent of the 2010 total, while nitrous oxide and fluorinated gases accounted for 6 percent and 2 percent respectively (IPCC 2014).

Federal Emissions Inventory

United States GHG emissions were 5,222 MMT of CO₂e in 2020. Emissions decreased by 9 percent from 2019 to 2020; since 1990, Total United States emissions have decreased by 11 percent from 1990 to 2020. The sharp decline in emissions from 2019 to 2020 is largely due to the impacts of the coronavirus (COVID-19) pandemic on travel and economic activity; however, the decline also reflects the combined impacts of long-term trends in many factors, including population, economic growth, energy markets, technological changes including energy efficiency, and the carbon intensity of energy fuel choices. In 2020, transportation activities accounted for the largest portion (27 percent) of total United States GHG emissions. Emissions from electric power accounted for the second largest portion (25 percent), while emissions from industry accounted for the third largest portion (24 percent) of total United States GHG emissions in 2020 (USEPA 2024).

California Emissions Inventory

Based on CARB California Greenhouse Gas Inventory for 2000-2020, California produced 369.2 MMT of CO₂e in 2020, which is 35.3 MMT of CO₂e lower than 2019 levels. The 2019 to 2020 decrease in emissions is likely due in large part to the impacts of the COVID-19 pandemic. The major source of GHG emissions in California is the transportation sector, which comprises 37 percent of the State's total GHG emissions. The industrial sector is the second largest source, comprising 20 percent of the State's GHG emissions while electric power accounts for approximately 16 percent (CARB 2023). The magnitude of California's total GHG emissions is due in part to its large size and large population compared to other states. However, a factor that reduces California's per capita fuel use and GHG emissions as compared to other states is its relatively mild climate. In 2016, California achieved its 2020 GHG emission reduction target of reducing emissions to 1990 levels as emissions fell below 431 MMT of CO₂e (CARB 2023).

Potential Effects of Climate Change

Globally, climate change has the potential to affect numerous environmental resources through potential impacts related to future air temperatures and precipitation patterns. Scientific modeling predicts that continued GHG emissions at or above current rates would induce more extreme climate changes during the twenty-first century than were observed during the twentieth century. Each of the past three decades has been warmer than all the previous decades in the instrumental record, and the decade from 2000 through 2010 has been the warmest. The observed global mean surface temperature from 2015 to 2017 was approximately 1.0°C (1.8°F) higher than the average

global mean surface temperature over the period from 1880 to 1900 (National Oceanic and Atmospheric Administration 2020). Furthermore, several independently analyzed data records of global and regional land-surface air temperature obtained from station observations jointly indicate that land-surface air temperature and sea surface temperatures have increased. Due to past and current activities, anthropogenic GHG emissions are increasing global mean surface temperature at a rate of 0.2°C per decade. In addition to these findings, there are identifiable signs that global warming is currently taking place, including substantial ice loss in the Arctic over the past two decades (IPCC 2014).

Regulatory Setting

Federal Regulations

FEDERAL CLEAN AIR ACT

The U.S. Supreme Court determined in *Massachusetts et al. v. Environmental Protection Agency et al.* ([2007] 549 U.S. 05-1120) that USEPA has the authority to regulate motor vehicle GHG emissions under the federal CAA. USEPA issued a Final Rule for mandatory reporting of GHG emissions in October 2009. This Final Rule applies to fossil fuel suppliers, industrial gas suppliers, direct GHG emitters, and manufacturers of heavy-duty and off-road vehicles and vehicle engines and requires annual reporting of emissions. In 2012, USEPA issued a Final Rule that established the GHG permitting thresholds that determine when CAA permits under the New Source Review Prevention of Significant Deterioration and Title V Operating Permit programs are required for new and existing industrial facilities.

In *Utility Air Regulatory Group v. Environmental Protection Agency* (134 Supreme Court 2427 [2014]), the U.S. Supreme Court held that USEPA may not treat GHGs as an air pollutant for purposes of determining whether a source can be considered a major source required to obtain a Prevention of Significant Deterioration or Title V permit. The Court also held that prevention of significant deterioration permits otherwise required based on emissions of other pollutants may continue to require limitations on GHG emissions based on the application of best available control technology.

State Regulations

CARB is responsible for the coordination and oversight of state and local air pollution control programs in California. There are numerous regulations aimed at reducing the state's GHG emissions. The initiatives directly related to this project are summarized below.

CALIFORNIA GLOBAL WARMING SOLUTIONS ACT OF 2006 (ASSEMBLY BILL 32 AND SENATE BILL 32)

The "California Global Warming Solutions Act of 2006" (AB 32) established the state's goal of reducing GHG emissions to 1990 levels by 2020 and required CARB to create a Scoping Plan to outline strategies for achieving this target. CARB's initial Scoping Plan was adopted in 2008, with updates in 2013 and 2017, introducing and expanding policies like the Cap-and-Trade Program and setting new targets for reducing emissions. The 2017 Scoping Plan set a goal of reducing GHG emissions to 40% below 1990 levels by 2030. In 2022, CARB released a comprehensive Scoping Plan Update, which outlines a pathway for California to achieve carbon neutrality by 2045, emphasizing new technologies, equity-focused measures, and addressing emissions from all sectors, including natural and working lands (CARB 2022b). This update aligns with recent state statutes and executive

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orders, reinforcing California's commitment to deep decarbonization and addressing climate change.

EXECUTIVE ORDER B-55-18

On September 10, 2018, former Governor Brown issued Executive Order B-55-18, which established a new statewide goal of achieving carbon neutrality by 2045 and maintaining net negative emissions thereafter. This goal is in addition to the existing statewide GHG reduction targets established by SB 375, SB 32, SB 1383, and SB 100.

SENATE BILL 1020

SB 1020 signed into law on September 16, 2022, requires renewable energy and zero-carbon resources to supply 90 percent of all retail electricity sales by 2035, 95 percent by 2040, and 100 percent by 2045. All State agencies facilities must be served by 100 percent renewable and zero-carbon resources by 2030. SB 1020 also requires the California Public Utilities Commission, CEC, and CARB to issue a joint progress report outlining the reliability of the electrical grid with a focus on summer reliability and challenges and gaps. Additionally, SB 1020 requires the California Public Utilities Commission to define energy affordability and use energy affordability metrics to develop protections, incentives, discounts, or new programs for residential customers facing hardships due to energy or gas bills.

Local Regulations

SAN JOAQUIN VALLEY AIR POLLUTION CONTROL DISTRICT

In August 2008, SJVAPCD's Governing Board adopted the Climate Change Action Plan (CCAP). The CCAP directed the SJVAPCD Air Pollution Control Officer to develop guidance to assist lead agencies, project proponents, permit applicants, and interested parties in assessing and reducing the impacts of project-specific GHG emissions on global climate change.

In 2009, SJVAPCD adopted the *Guidance for Valley Land-use Agencies in Addressing GHG Emission Impacts for New Projects Under CEQA* and the *District Policy – Addressing GHG Emission Impacts for Stationary Source Projects Under CEQA When Serving as the Lead Agency*. The guidance and policy rely on the use of performance-based standards, otherwise known as Best Performance Standards (BPS), to assess significance of project-specific GHG emissions on global climate change during the environmental review process, as required by CEQA.

Use of BPS was a method for CEQA streamlining, but they were not required measures. Projects implementing BPS could be determined to have a less than cumulatively significant GHG impact. Another option was to demonstrate a 29 percent reduction in GHG emissions from business-as-usual (BAU) conditions to determine that a project would have a less than cumulatively significant impact and be consistent with AB 32 2020 targets. The guidance does not limit a lead agency's authority in establishing its own thresholds for determining the significance of project-related GHG impacts. Since SJVAPCD's recommended BPS method and 29 percent below BAU method were designed with 2020 GHG reduction targets in mind, compliance with these BPS or demonstration of 29 percent below BAU are no longer applicable to determining the significance of GHG impacts for projects developed after 2020.

Impact Analysis

- a. *Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?*
- b. *Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?*

The majority of individual projects do not generate sufficient GHG emissions to directly influence climate change. However, physical changes caused by a project can contribute incrementally to cumulative effects that are significant, even if individual changes resulting from a project are limited. The issue of climate change typically involves an analysis of whether a project's contribution towards an impact would be cumulatively considerable. "Cumulatively considerable" means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, other current projects, and probable future projects (CEQA Guidelines, Section 15064[h][1]).

According to the State CEQA Guidelines, projects can tier from a qualified GHG reduction plan, which allows for project-level evaluation of GHG emissions through the comparison of the project's consistency with the GHG reduction policies included in a qualified GHG reduction plan. This approach is considered by the Association of Environmental Professionals (2016) in its white paper, *Beyond Newhall and 2020*, to be the most defensible approach presently available under CEQA to determine the significance of a project's GHG emissions.

The SJVAPCD's CCAP, adopted in 2009, assists lead agencies, project proponents, permit applicants, and interested parties in assessing and reducing the impacts of project specific GHG emissions on global climate change. The guidance and policy rely on the use of performance-based standards to assess significance of project-specific GHG emissions on global climate change during the CEQA review process. Demonstration of a 29-percent reduction in GHG emissions from business-as-usual is required to determine that a project would have a less-than-significant impact and would be consistent with the 2020 GHG emissions reduction targets under AB 32. Therefore, the CCAP is not considered a qualified GHG reduction strategy for assessing the significance of GHG emissions generated by projects with a horizon year beyond 2020.

In the absence of any adopted numeric threshold, the significance of the project's GHG emissions is evaluated consistent with CEQA Guidelines Section 15064.4(b) by considering whether the project complies with applicable plans, policies, regulations, and requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions. For this project, the most directly applicable adopted regulatory plan to reduce GHG emissions is CARB's 2022 Scoping Plan.

This analysis evaluates the project against the goals of the 2022 Scoping Plan. A major element of the 2022 Scoping Plan is the aggressive reduction of fossil fuels, which includes the development of renewable energy and phasing out the use of natural gas for heating structures. Project buildings would adhere to California's Energy Efficiency Standards and Green Building Standards Code, and actually exceed these standards by 3.5 percent, which would improve energy efficiency and reduce emissions associated with water use, energy, and construction waste. The proposed project would also include rooftop photovoltaic systems that would approximate 6,305 sf for Building A, 1,601 sf for Building B, 7,866 sf for Building C, and 11,310 sf for Building D. Furthermore, the project would include 13 EV charging stations, and use low flow plumbing fixtures, which would provide alternative renewable transportation infrastructure and reduce water use and, in direct alignment

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with the 2022 Scoping Plan. Therefore, although the project would generate temporary construction and operational emissions, as described below, the project would ultimately be consistent with the goals of CARB’s 2022 Scoping Plan.

Project construction would generate GHG emissions from the operation of heavy machinery and equipment and material haul truck trips and construction worker trips to and from the project site. Construction GHG emissions were estimated using CalEEMod. Operation of the project would generate GHG emissions associated with area, energy, and mobile sources, such as landscaping equipment and employee vehicle trips. Quantification of GHG emissions from construction and operational activities are provided for informational purposes.

As shown in Table 7, construction of the project would generate an estimated total of 337 metric tons of carbon dioxide equivalent (MT CO₂e). The Association of Environmental Professionals (2016) recommends GHG emissions from construction be amortized over 30 years and added to operational GHG emissions to determine the overall impact of a project. The construction of the proposed project would generate an estimated 11.5 MT CO₂e per year over a 30-year period.

Table 7 Estimated Construction Emissions of Greenhouse Gases

Construction	Project Emissions MT CO ₂ e
Construction Emissions	
2025	328
2026	18
Total Construction Emissions	346
Amortized Construction Emissions (over 30 years)	11.5
MT CO ₂ e = metric tons of carbon dioxide equivalent See Appendix A for CalEEMod worksheets.	

Table 8 combines the estimated construction and operational GHG emissions associated with development of the project. As shown in Table 8, annual emissions from the project would be approximately 424 MT of CO₂e per year with amortized construction emissions.

Table 8 Combined Annual Emissions of Greenhouse Gases

Emission Source	Annual Emissions (MT CO ₂ e)
Construction¹	11.5
Operational	
Area	1
Energy	161
Mobile	228
Solid Waste	11
Water, Wastewater	11
Total	424
¹ Amortized construction related GHG emissions over 30 years. MT CO ₂ e = metric tons of carbon dioxide equivalent See Appendix A for CalEEMod worksheets.	

Therefore, the proposed project would not be in conflict with any applicable plans, policies, or regulations for the purpose of reducing GHG emissions, and impacts involving the generation of GHG emissions would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

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9 Hazards and Hazardous Materials

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than - Significant Impact	No Impact
Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Be located on a site that is included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. For a project located in an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Environmental Setting

Site Reconnaissance Summary

Rincon completed a site reconnaissance for Phase II, to support this IS-MND, on July 17, 2024. At the time of the site reconnaissance, the project site consisted of vacant land. Adjacent land uses included commercial development to the north and west, and residential development to the south and east. Potential environmental concerns observed at the project site at the time of the site reconnaissance included the presence of spray paint cans. No other potential environmental concerns were identified.

Historical Resource Review

A review of historical aerial photographs and topographic maps available online indicates that the project site was vacant from at least 1923 and developed with a residence since approximately 1927 and as orchard land from as early as 1957. By 1984, the orchards are no longer present; however, the agricultural fields are still present. By 2002, the project site consisted of vacant land and has remained as such since that time.

Adjacent properties were comprised of orchards, agricultural land, and associated residences since at least 1957 until sometime between 1972 and 1984. Rural residences and agricultural land were present until approximately 2002. By 2005, land to the north of the project site had been redeveloped for commercial uses, and by 2009, residences were constructed to the east. Commercial property to the west of the project site was under construction in 2016 (Nationwide Environmental Title Research, LLC 2024).

Hazardous Material Release Case Listings

The project site is not listed in the State Water Resources Control Board (SWRCB) GeoTracker database, the Department of Toxic Substances Control (DTSC) EnviroStor database, or other Cortese List data resources available via the California Environmental Protection Agency (CalEPA) (SWRCB 2024a, DTSC 2024, CalEPA 2024).

Von's Fuel Center at 1640 Herndon Avenue, located across North Fowler Avenue to the west of the project site, has registered underground storage tanks; however, no releases have been reported. No adjacent properties or nearby properties within 0.25 mile of the project site are listed in these databases.

Potential Regional Hazards

LANDFILLS

According to a review of the California Department of Resources, Recycling, and Recovery (CalRecycle) online Solid Waste Information System database, no landfills are located within 2,000 feet of the project site (CalRecycle 2024a). The nearest solid waste disposal facility listed on the Solid Waste Information System database, Republic Services at 10463 North Rice Road in Fresno, is located approximately eight miles northwest of the project site (CalRecycle 2024).

OIL AND GAS WELLS/FIELDS

According to a review of California DOC, Geologic Energy Management Division (CalGEM) online oil and gas well and field records, the project site is not located within an oil/gas field and no oil/gas wells are located within 1,000 feet of the project site (CalGEM 2024).

HAZARDOUS MATERIAL PIPELINES

According to a review of the United States Department of Transportation (USDOT), Pipeline Hazardous Materials Safety Administration's online National Pipeline Mapping System database, no hazardous liquid pipelines are located within 1,000 feet of the project site (USDOT 2024).

PER- AND POLYFLUOROALKYL SUBSTANCES

Beginning in 2019, the SWRCB issued letters to property owners of sites that may be potential sources of per- and polyfluoroalkyl substances (PFAS). These sites currently include select landfills, airports, chrome plating facilities, publicly owned treatment works facilities, Department of Defense sites, and bulk fuel storage terminals and refineries. The letters included a SWRCB Water Code Section 13267 Order (Investigative Order). An Investigative Order is a directive from the SWRCB to conduct on-site testing of groundwater and/or leachate.

According to a review of the California PFAS Investigations online map viewer, there are no current landfill, airport, chrome plating, publicly owned treatment works, Department of Defense, or bulk fuel storage terminal/refinery PFAS orders at any facilities listed as located within one mile of the project site (SWRCB 2024b; 2024c).

EDUCATIONAL FACILITIES AND AIRPORTS

There are several educational facilities within one mile of the project site: Community Day Elementary School, Mickey Cox Elementary School, and Gateway High School. The closest educational facility is Community Day Elementary School, located approximately 500 feet southwest of the project site. Mickey Cox Elementary School is located 0.25 mile southeast of the project site.

There are no airports within one mile of the project site. The closest airport is the Fresno-Yosemite International Airport, located approximately 4.5 miles south-southwest of the project site.

Regulatory Setting

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

As a department of CalEPA, DTSC is the primary agency in California that regulates hazardous waste, cleans up existing contamination, and looks for ways to reduce the hazardous waste produced in California. DTSC regulates hazardous waste in California primarily under the authority of the Resource Conservation and Recovery Act and the California Health and Safety Code.

DTSC also administers the California Hazardous Waste Control Law to regulate hazardous wastes. The California Hazardous Waste Control Law lists 791 chemicals and approximately 300 common materials that may be hazardous; establishes criteria for identifying, packaging, and labeling hazardous wastes; prescribes management controls; establishes permit requirements for treatment, storage, disposal, and transportation; and identifies some wastes that cannot be disposed of in landfills.

Government Code Section 65962.5 requires DTSC, the State Department of Health Services, SWRCB, and CalRecycle to compile and annually update lists of hazardous waste sites and land designated as hazardous waste sites throughout the state. The Secretary for Environmental Protection consolidates the information submitted by these agencies and distributes it to each city and county where sites on the lists are located. Before the lead agency accepts an application for a development project as complete, the applicant must consult these lists to determine if the site at issue is included.

If any soil is excavated from a site containing hazardous materials, it is considered a hazardous waste if it exceeds specific criteria in Title 22 of the CCR. Remediation of hazardous wastes found at a site may be required if excavation of these materials is performed, or if certain other soil disturbing activities would occur. Even if soil or groundwater at a contaminated site does not have the characteristics required to be defined as hazardous waste, remediation of the site may be required by regulatory agencies subject to jurisdictional authority. Cleanup requirements are determined on a case-by-case basis by the agency taking jurisdiction.

GOVERNMENT CODE SECTION 65962.5 (CORTESE LIST)

Section 65962.5 of the Government Code requires CalEPA to develop and update a list of hazardous waste and substances sites, known as the Cortese List. The Cortese List is used by state, local agencies, and developers to comply with CEQA requirements. The Cortese List includes hazardous substance release sites identified by DTSC, SWRCB, and CalRecycle.

Impact Analysis

- a. *Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?*
- b. *Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?*

The proposed project would not involve the transport, use, or disposal of hazardous materials other than the routine use of chemicals during construction (e.g., fuel and engine fluids for equipment, paint, and asphalt) and would not create conditions which could lead to the release of hazardous substances. Hazardous materials used during construction would be required to be transported under USDOT regulations (USDOT Hazardous Materials Transport Act, 49 Code of Federal Regulations), which stipulate the types of containers, labeling, and other restrictions to be used in the movement of such material on interstate highways. In addition, the use, storage, and disposal of hazardous materials are regulated through the Resource Conservation and Recovery Act. DTSC is responsible for implementing the Resource Conservation and Recovery Act program, as well as California's own hazardous waste laws. DTSC regulates hazardous waste, remediation of existing contamination, and looks for ways to control and reduce the hazardous waste produced in California. It does this primarily under the authority of the Resource Conservation and Recovery Act and in accordance with the California Hazardous Waste Control Law (California H&SC Division 20, Chapter 6.5) and the Hazardous Waste Control Regulations (Title 22, CCR, Divisions 4 and 4.5). Compliance with existing regulations would reduce the risk of potential release of hazardous materials during construction. Roadway users would be subject to a very small risk of exposure to upset and accident conditions from the release of hazardous materials being transported by motor vehicles during project construction; however, this is not a reasonably foreseeable risk to roadway

users. The proposed project would be required to comply with all applicable rules and regulations involving hazardous materials, including the State of California CCR Title 23 Health and Safety Regulations, the California Division of Occupational Safety and Health requirements, the Hazardous Waste Control Act, the California Accidental Release Prevention Program, and the California Health and Safety Code. Regular inspections are conducted of licensed waste transporters by agencies to ensure compliance with requirements that range from the design of vehicles used to transport wastes to the procedures to be followed in case of spills or leaks during transit. Therefore, the project would have a less than significant impact involving the creation of a significant hazard to the public or the environment through the routine transport, use or disposal of hazardous materials, or through reasonably foreseeable upset and accident conditions.

LESS-THAN-SIGNIFICANT IMPACT

- c. Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?*

The proposed project is located within 0.25 mile of two schools: Community Day Elementary School, located approximately 500 feet southwest of the project site, and Mickey Cox Elementary School, located 0.25 mile southeast of the project site. Children are particularly susceptible to long-term effects from exposure to hazardous materials. Locations where children spend extended periods of time, such as schools, are considered sensitive to hazardous air emissions and accidental release associated with the handling of extremely hazardous materials, substances, or wastes.

Construction could involve both the use and transport of both hazardous materials and hazardous wastes and would be required to be managed by BMPs; in addition, the use of common construction hazardous materials and wastes in quantities needed for a development of this size would not be expected to present hazards to the school. The use of such materials would present a potential impact were they to be transported near the elementary schools; however, licensed hazardous materials transporters leaving the project site would utilize major streets, as required by State regulations listed above, which would involve accessing the project site from Herndon Avenue, thereby avoiding transporting hazardous materials adjacent to these schools. Therefore, it is unlikely transporters would be required to drive past the schools while carrying hazardous materials.

Operation of the proposed development would not be reasonably expected to generate hazardous materials or waste, other than minor quantities typically used for cleaning or landscaping maintenance.

Given the nature of the project and compliance with existing regulations, the project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or wastes within 0.25 mile of a school. Impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

- d. Would the project be located on a site that is included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?*

The project site is not listed on the SWRCB GeoTracker database, the DTSC EnviroStor database, or other Cortese List data resources available via the California EPA (SWRCB 2024a, DTSC 2024, CalEPA 2024); therefore, the project site is not included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5.

Based on the research conducted in “Setting” above, the project site and adjacent properties were historically used as orchards from at least 1957 until sometime between 1972 and 1984. Therefore, there is a potential for organochlorine pesticides (OCPs) and arsenic to be present in shallow soil at the project site. Due to the unknown impacts associated with former agricultural uses, there is potential for soil at the project site to be impacted with hazardous substances. With the potential for soil impacted by historical agricultural usage at the project site, there is a potential for grading and construction workers to be exposed to OCPs and arsenic dust and/or soil that may be present in the former agricultural areas. Additionally, if offsite disposal of soils from the project site would occur during project construction, the soil may require special handling or disposal as a waste. This may result in a potentially significant hazard to the public or the environment during grading/construction at the project site. Implementation of Mitigation Measures HAZ-1 through HAZ-3, discussed below, would reduce the grading and construction impacts related to unknown hazardous substance releases to less than significant with mitigation incorporated.

The risk of hazardous materials creating a significant hazard to the public or the environment would primarily occur during construction of the project when potential on-site contamination is disturbed. Once the project is operational, no ground disturbance activities that could unearth contaminated media would occur. Therefore, operational impacts would be less than significant.

Mitigation Measures

HAZ-1 Subsurface Investigation

Prior to commencement of construction/grading activities at the project site, the project applicant shall retain a qualified environmental consultant (Professional Geologist [PG] or Professional Engineer [PE]) to conduct a subsurface investigation(s). The subsurface investigations may include, but are not limited to, sampling for the following chemicals of potential concern within the construction envelope/proposed soil disturbance areas:

- OCPs and arsenic in former agricultural areas

As part of the subsurface investigations, analytical results shall be screened against San Francisco Bay Regional Water Quality Control Board environmental screening levels (ESLs) for construction workers and commercial/industrial uses, since site uses would be as administrative offices. The ESLs are risk-based screening levels for direct exposure of construction workers, residential, and commercial/industrial land uses. The subsurface investigation reports shall include recommendations to address identified hazards and indicate when to apply those recommended actions in relation to project activities.

If contaminants are detected at the project site above ESLs for construction workers and commercial uses, appropriate steps shall be undertaken to protect site workers during project construction. This would include the preparation of a Soil Management Plan (SMP) (see Mitigation Measure HAZ-2).

If contaminants are detected at concentrations exceeding hazardous waste screening thresholds for contaminants in soil (CCR Title 22, Section 66261.24), appropriate steps shall be undertaken to manage soil exceeding hazardous waste thresholds during project construction and if necessary, protect the public during project operation (see Mitigation Measures HAZ-2 and HAZ-3).

HAZ-2 Soil Management Plan

Prior to commencement of construction/grading activities at the project site, the qualified environmental consultant (PG or PE) shall prepare a SMP for the project site. The SMP shall address:

1. On-site handling and management of impacted soils or other impacted wastes (e.g., stained soil, and soil with solvent or chemical odors) if such soils or impacted wastes are encountered, and
2. Specific actions to reduce hazards to construction workers and offsite receptors during the construction phase.

The SMP must establish measures and soil management practices related to impacted soil to ensure construction worker safety, the health of future workers and visitors, and the off-site dust migration of contaminants from the project. These measures and practices shall include, but are not limited to:

- Stockpile management, including stormwater compliance and installation of BMPs
- Proper disposal procedures of impacted soils
- Investigation procedures for encountering known and unexpected odorous or visually stained soils, other indications of hydrocarbon piping or equipment, and/or debris during ground-disturbing activities
- Monitoring and reporting
- An environmental health and safety plan for contractors working at the project site that addresses the safety and health hazards of each phase of site construction activities with the requirements and procedures for employee protection as it relates to impacted soil. The health and safety plan shall outline proper soil handling procedures and health and safety requirements to minimize worker and public exposure to hazardous materials during construction.

CUSD shall review and approve the SMP prior to issuance of grading permits. CUSD shall implement the SMP during construction/grading at the project site.

HAZ-3 Agency Oversight

If impacted soil is identified during implementation of Mitigation Measure HAZ-1 (subsurface investigation) within the construction envelope at chemical concentrations exceeding construction worker or commercial ESLs and/or hazardous waste screening thresholds for contaminants in soil, the qualified environmental consultant (PG or PE) shall delineate and dispose of the contaminated soil or recommend remedial engineering controls, if appropriate. The qualified environmental consultant shall utilize the project site analytical results for waste characterization before offsite transportation or disposal of potentially impacted soils or wastes. The qualified consultant shall arrange for proper disposal and/or recommend remedial engineering controls, if appropriate.

Remediation of impacted soils and/or implementation of remedial engineering controls may require additional delineation of sub-surface impacts; additional analytical testing per landfill or recycling facility requirements; soil excavation; and offsite disposal or recycling.

CUSD shall review, approve, and implement the project site disposal recommendations for regulated waste prior to transportation of impacted soils offsite, and review and approve remedial engineering controls, prior to issuing a grading permit.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

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

There are no airports within two miles of the project site. The closest airport is the Fresno-Yosemite International Airport, located approximately 4.5 miles south-southwest of the project site.

Therefore, no impact would occur.

NO IMPACT

- f. *Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?*

The Fresno County Multi-Jurisdictional Hazard Mitigation Plan (MJHMP) was created to safeguard the people and properties within Fresno County, including City of Clovis (Annex A), against various hazard events (Fresno County 2024). The MJHMP also plays a crucial role in maintaining eligibility for federal disaster assistance, including programs such as the Federal Emergency Management Agency’s (FEMA) Hazard Mitigation Grant Program, Pre-Disaster Mitigation program, and Flood Mitigation Assistance (Fresno County 2024). This plan details the hazard mitigation process, highlights key hazards and vulnerabilities, and sets forth strategies designed to enhance resilience and reduce risks throughout the county. Through proactive planning and implementation of these strategies, Fresno County aims to mitigate disaster response and recovery costs, protect essential community facilities, reduce liability, and minimize the overall impact of future hazard events.

Project construction or operation would not hinder the County’s implementation of its emergency response and emergency evacuation plan. During the construction phase, the staging area is expected to remain on-site and not block roadways. Once the project is operational, traffic volume from the project is not expected to increase beyond the planned increase identified in the Clovis General Plan, as the use is consistent with the General Plan designation at this location. Therefore, no impact is anticipated. The project would not impair the implementation or physically interfere with an adopted emergency response plan or emergency evacuation plan; therefore, no impact would occur.

NO IMPACT

- g. *Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?*

Refer to Environmental Checklist Section 20, *Wildfire*. The project is in an urban setting and not within or near a fire severity zone. No impact would occur.

NO IMPACT

10 Hydrology and Water Quality

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than - Significant Impact	No Impact
Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
(i) Result in substantial erosion or siltation on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(iv) Impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Environmental Setting

Stormwater runoff in the City of Clovis is conveyed through a system of street gutters, underground storm drains, retention/detention basins, pumping stations, and open channels that are maintained by the FMFCD. A network of storm drains in the City discharges into 31 retention basins, most of which provide drainage for a one- to two-square-mile area. There are no existing stormwater facilities on the project site.

The project site, as with the City of Clovis, is underlain by the Kings Groundwater Basin, which is bounded on the north by the San Joaquin River, on the west by the Delta-Mendota and Westside Subbasins, the south by the Kings River South Fork and the Empire West Side Irrigation District, and on the east by the Sierra Nevada foothills. According to the 2022 Groundwater Sustainability Plan, the most recently adopted plan, the Kings Subbasin is identified as critically overdrafted (McMullin 2022).

The project site is currently undeveloped and comprised of flat, former agricultural land. An existing manmade stormwater culvert is present along Herndon Avenue, generally running in an east-west direction. The project site and vicinity are classified as Zone X (Area of Minimal Flood Hazard) (FEMA 2009). The project site is not subject to inundation or seiche hazards from the Big Dry Creek Reservoir, Redbank Reservoir, or Fancher Creek Reservoir and Dam, Pup Creek Basin, or the Alluvial Drain Basin (City of Clovis 2014b).

Impact Analysis

- a. *Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?*

The Clean Water Act establishes the framework for regulating discharges to waters of the United States in order to protect their beneficial uses. The Porter-Cologne Water Act (Division 7 of the California Water Code) regulates water quality within California and establishes the authority of the SWRCB and the nine RWQCBs. As discussed in Environmental Checklist Section 7, *Geology and Soils*, the SWRCB and RWQCBs issue NPDES permits to regulate specific water discharges, including a Construction General Permit for projects that disturb more than one acre.

Grading and other construction activities associated with the project could adversely affect water quality due to erosion resulting from exposed soils and the generation of water pollutants, including trash, construction materials, and equipment fluids. Soil disturbance associated with site preparation and grading activities would result in looser, exposed soils, which are more susceptible to erosion. Additionally, spills, leakage, or improper handling and storage of substances such as oils, fuels, chemicals, metals, and other substances from vehicles, equipment, and materials used during construction could contribute to stormwater pollutants or leach to underlying groundwater.

The project would disturb more than one acre, and thus construction activities would be subject to the Construction General Permit, which requires visual monitoring of stormwater and non-stormwater discharges, sampling, analysis, and monitoring of non-visible pollutants, and compliance with all applicable water quality standards established for receiving waters potentially affected by construction discharges. Furthermore, the Construction General Permit requires implementation of a SWPPP that outlines project-specific BMPs to control erosion. Such BMPs may include, but are not limited to, the use of temporary desilting basins, construction vehicle maintenance in staging areas to avoid leaks, and installation of erosion control blankets. The construction SWPPP and BMPs would be designed to prevent sedimentation of both on-site and off-site surface waters from

construction activities; prevent leaking of pollutants such as oil, grease, and chemicals; and implement spill control and response measures in the case of accidental releases. Compliance with these existing requirements would ensure that construction-phase water quality impacts would be less than significant.

Operation of the proposed project would not involve the discharge of water outside of use of the existing sewer or storm drain systems. Operation of the proposed project would be required to comply with CMC (Section 6.7.301) and FMFCD standards, which regulate stormwater discharges and set standards for post construction storm water management including the requirement of specific source control measures. The project would incorporate design features that would enact requirements stipulated by the SWRCB for the purpose of reducing pollutants in storm water discharges.

Based on the above, with implementation of project-specific BMPS and compliance with CMC and FMFCD standards, the project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality. As such, impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

- b. Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?*

The City's domestic water system is primarily served through the City's Surface Water Treatment Plant using surface water via existing water entitlements, reducing the need for pumped groundwater. The City has also expanded the capacity of its Water Reuse Facility to meet its projected water needs over the next 25-30 years while protecting groundwater resources, reducing historic groundwater overdraft, and maintaining existing recharge basins while also enhancing to maximize intentional recharge amounts groundwater recharge (City of Clovis 2019; McMullin 2022). As discussed in Environmental Checklist Section 19, *Utilities and Service Systems*, the City would have sufficient water supplies to serve the project. Furthermore, the project was accounted for in water supply planning in the Clovis General Plan. Consequently, the project's water demand would primarily be served by surface water and would not require the development of additional water sources, such as groundwater. Since the project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge or impede sustainable groundwater management, this impact would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

- c.(i) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site?*
- c.(ii) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?*

- c.(iii) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?*

As discussed under threshold 10a, construction would be subject to standards of the Construction General Permit, which regulates stormwater discharge. Compliance with these standards would reduce the risk of short-term erosion and increased runoff resulting from drainage alterations during construction. During operation, the project would increase impervious surfaces at the project site through the addition of four new structures and associated parking. However, runoff would be controlled through compliance with CMC Section 6.7.301, which requires new development projects to control the volume, rate, and potential load of stormwater runoff. Pursuant to CMC Section 6.7.301, the proposed project would include BMPs for stormwater runoff such that the project would not alter the existing drainage pattern of the site and cause substantial erosion, flooding, or increased polluted runoff. Impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

- c.(iv) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows?*

The project site is not depicted as being within a floodplain on FEMA maps and is classified as Zone X (Area of Minimal Flood Hazard) (FEMA 2009). Although construction of the project would increase impervious surfaces on the project site, the project would not have the potential to redirect or impede flood flows. No impact would occur.

NO IMPACT

- d. In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?*

The project site is located approximately 117 miles inland from the California coast, and thus, is not subject to a tsunami hazard. There are no aboveground bodies of water near the project site nor is the site subject to flood hazards from dam inundation (City of Clovis 2014b). As discussed under Threshold 10c.iv, the project site is not depicted within a floodplain. Accordingly, the project would not risk release of pollutants due to inundation. No impact would occur.

NO IMPACT

- e. Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?*

The project site is subject to the Water Quality Control Plan for the San Joaquin River Basin. The Sustainable Groundwater Management Act of 2014 requires the formation of local Groundwater Sustainability Agencies (GSAs) that are responsible for developing Groundwater Sustainability Plans (GSPs). The City and the project site are located within the jurisdiction of the North Kings GSA, whose most recent GSP was adopted in August 2022. The City, as an implementing agency within the GSA, would construct several GSP-approved projects to increase the recharge of surface water and sewer-treated water, install new water meters, and recharge basins (McMullin 2022). The GSP accommodates a full buildout of the City of Clovis and would achieve groundwater sustainability by

2040. The project would include water conservation measures, such as low-flow plumbing fixtures, and would adhere to applicable RWQCB water quality standards through compliance with FMFCD and CMC stormwater regulations, thereby precluding the potential to conflict with or obstruct implementation of the 2022 GSP. This impact would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

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11 Land Use and Planning

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than - Significant Impact	No Impact
Would the project:				
a. Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a. Would the project physically divide an established community?

The project would not involve the demolition of any existing structures or roadways. The project would not separate connected neighborhoods or land uses from each other. No new roadways, linear infrastructure, or other development features are proposed that would divide an established community or limit movement, travel, or social interaction between established land uses. No impact would occur.

NO IMPACT

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

The project site is designated General Commercial and zoned Community Commercial (City of Clovis 2014a; 2024). The project would provide office-type development and would be compatible with both the commercial land use designation and zoning of the project site. The proposed project would not introduce a new land use that would conflict with the City’s General Plan, the CMC, or a plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, the project would have no impact.

NO IMPACT

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12 Mineral Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than - Significant Impact	No Impact
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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?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

The project site is not located within a designated Mineral Resource Zone, as identified by CGS (CGS 2024). Additionally, as outlined in the City’s General Plan Environmental Impact Report (EIR), the entire City is mapped as Mineral Resource Zone 3 (City of Clovis 2014b). This classification indicates that the significance of mineral deposits within the area cannot be determined from the available data. The closest area designated as Mineral Resource Zone 2, which indicates areas with significant mineral deposits, is the San Joaquin River resource area, located approximately six miles from the project site. Consequently, the project would not result in the loss of availability of a known mineral resource or locally important mineral resource recovery site, and would result in no impact to mineral resources.

NO IMPACT

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13 Noise

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than - Significant Impact	No Impact
Would the project result in:				
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Noise Overview

Sound is a vibration that transmits through a medium (such as a gas, liquid, or solid) created by a moving or vibrating source, which is capable of being detected by the hearing organs. Noise is defined as sound that is loud, unpleasant, unexpected, or undesired and may therefore be classified as a more specific group of sounds.

Noise levels are commonly measured in decibels (dB) using the A-weighted sound pressure level (dBA). The A-weighting scale is an adjustment to the actual sound pressure levels so that they are consistent with the human hearing response, which is most sensitive to frequencies around 4,000 hertz and less sensitive to frequencies around and below 100 hertz (Kinsler, et al. 1999). Decibels are measured on a logarithmic scale that quantifies sound intensity in a manner similar to the Richter scale used to measure earthquake magnitudes. A doubling of the energy of a noise source, such as the doubling of vehicle traffic volumes, results in a noise level increase of 3 dB, whereas dividing the energy in half results in a 3 dB decrease (Crocker 2007).

Human perception of noise has no simple correlation with sound energy, i.e., the perception of sound is not linear in terms of dBA or in terms of sound energy. Two sources, each containing the same sound energy, do not “sound twice as loud” as one source. It is widely accepted that the average healthy human ear can detect changes (either increases or decreases) of 3 dBA, which is recognized as being barely perceptible to most people. Similarly, a change of 5 dBA is readily perceptible and a change of 10 dBA sounds twice (or half) as loud (Crocker 2007).

Descriptors

The impact of noise is not a function of loudness alone. The time of day when noise occurs, and the duration of the noise are also important. In addition, most noise that lasts for more than a few seconds is variable in its intensity. Consequently, a variety of noise descriptors has been developed. The noise descriptors used in this analysis are the equivalent continuous noise level (L_{eq}) and the maximum noise level (L_{max}). The L_{eq} is defined as the single steady A-weighted level that is equivalent to the same amount of energy as that contained in the actual fluctuating levels over a period of time. Typically, L_{eq} is equivalent to a one-hour period, even when measured for shorter durations as the noise level of a 10- to 30-minute period would be the same as the hour if the noise source is relatively steady. L_{max} is the highest Root Mean Squared (RMS) sound pressure level within the sampling period.

Propagation

Sound from a small, localized source (approximating a “point” source) radiates uniformly outward as it travels away from the source in a spherical pattern, known as geometric spreading. The sound level decreases or drops off at a rate of 6 dBA for each doubling of the distance away from the source. Other sources of noise, such as a road or railroad, are not a single, stationary point source of sound but rather, emanate noise from a line (“line” source). The drop-off rate for a line source is 3 dBA for each doubling of distance away from the source.

The propagation of noise is also affected by the absorption characteristics of the ground: a hard site, such as a parking lot or smooth body of water, provides no absorption/attenuation and the changes in noise levels with distance result simply from the geometric spreading of the source (i.e., 3 or 6 dBA reduction per doubling of distance for a point source or line source, respectively). Conversely, a soft site, such as soft dirt, grass, or scattered bushes and trees, may provide additional absorption/attenuation, potentially reducing noise levels an additional 1.5 dBA per doubling of distance away from the source (Caltrans 2013).

Noise levels may also be reduced by intervening structures. The amount of reduction provided by the “shielding” of these features depends on the size of the structure/s, the location of the structure/s relative to the noise source and receivers, and the frequency content of the noise levels. Natural terrain features, such as hills and dense woods, and man-made features, such as buildings and walls, can significantly alter noise levels. Generally, any large structure blocking the line of sight between a noise source and receiver would provide at least a 5-dBA reduction in source noise levels at the receiver (Federal Highway Administration [FHWA] 2011).

Vibration Overview

Vibration levels are usually expressed as a single-number measure of vibration magnitude in terms of velocity or acceleration, which describes the severity of the vibration without the frequency variable. The peak particle velocity (PPV) is defined as the maximum instantaneous positive or negative peak of the vibration signal, usually measured in inches per second. Since it is related to the stresses experienced by buildings, PPV is often used in monitoring and controlling construction vibration. Although PPV is appropriate for evaluating the potential of building damage, it is not suitable for evaluating human response. It takes some time for the human body to respond to vibrations. In a sense, the human body responds to an average vibration amplitude (Federal Transit Administration [FTA] 2018). Because vibration waves are oscillatory, the net average of a vibration signal is zero. Thus, the RMS amplitude is used to describe the “smoothed” vibration amplitude (FTA 2018). The RMS of a signal is the square root of the average of the squared amplitude of the signal,

usually measured in inches per second. The average is typically calculated over a one-second period. The RMS amplitude is always less than the PPV and is always positive. Decibel notation is used to compress the range of numbers required to describe vibration. The abbreviation “VdB” is used in this analysis for “vibration decibels” to reduce the potential for confusion with sound decibels.

Sensitive Receptors

Noise exposure goals for various types of land uses reflect the varying noise sensitivities associated with those uses. The Clovis General Plan identifies “schools, hospitals, senior housing and convalescent facilities, residential uses, places of worship, libraries, and passive outdoor recreation areas” as noise-sensitive land uses within the City (City of Clovis 2014). The closest sensitive receptors to the project site include adjacent residential communities to the east and south and the Community Day Elementary School to the west of the project site.

Project Noise Setting

The primary noise source in the vicinity of the project site is vehicular traffic along Herndon Avenue, North Fowler Avenue, and Tollhouse Road. As part of the Noise & Groundborne Vibration Impact Analysis prepared by AMBIENT Air Quality & Noise Consulting in support of the 2023 Initial Study prepared for the project (AMBIENT Air Quality & Noise Consulting 2023), three short-term (10-minute) noise measurements were conducted in the project area on March 30, 2023, to determine the existing ambient noise environment. The results of the noise measurements showed that average noise levels at the project site ranged between 43.8 and 71.2 dBA L_{eq} , while instantaneous maximum noise levels ranged between 53.8 and 89.5 dBA L_{max} . Measurement results are shown in Table 9.

Table 9 Summary of Measured Ambient Noise Levels

Measurement Location	Measurement Description	Measurement Period	Noise Level (dBA)	
			Average-Hourly (L_{eq})	Maximum (L_{max})
ST1	Approximately 90 feet east of the Renoir Lane and Amedeo Lane intersection	11:05 – 11:15 a.m.	43.8	53.8
ST2	Approximately 760 feet southeast of Herndon Avenue and North Fowler Avenue intersection	11:25 – 11:35 a.m.	55.8	66.0
ST3	Adjacent to east side of North Fowler Avenue, across from Dutch Bros Coffee	11:45 – 11:55 a.m.	71.2	89.5

Source: AMBIENT Air Quality & Noise Consulting 2023.

ST1 represents the measurement location closest to the project site, taken near the southeast corner of the Phase II project boundary. Additionally, based on the future roadway noise contours provided in the City of Clovis General Plan, the ambient noise environment at the project site ranges from below 60 dBA CNEL to 65 dBA CNEL (City of Clovis 2014b).

Significance Thresholds

Section 9.22.080 of the CMC specifies maximum exterior noise limits that are not to be exceeded for various land use types. These noise limits, which apply at the property line, are shown in Table 10.

Table 10 Maximum Exterior Noise Standards

Noise Zone	Type of Land Use	Allowable Exterior Noise Level (15-Minute L_{eq})	
		7:00 a.m. to 10:00 p.m.	10:00 p.m. to 7:00 a.m.
I	Single-, two- or multiple-family residential	55 dBA	50 dBA
II	Commercial	65 dBA	60 dBA
III	Residential portions of mixed use properties	60 dBA	50 dBA
IV	Industrial or manufacturing	70 dBA	70 dBA

Notes:

1. If the ambient exceeds the resulting standard, the ambient shall be the standard.
2. It is unlawful for any person to create any noise, or to allow the creation of any noise on property owned, leased, occupied or otherwise controlled by such person, which causes the noise level when measured on any property measured at the property line, to exceed either of the following within the incorporated area of the City:
 - a. The noise standard for the applicable zone for any fifteen (15) minute period;
 - b. A maximum impulsive noise equal to the value of the noise standard plus twenty (20) dBA for any period of time (measured using A-weighted slow response). Impulsive noise which repeats four (4) or more times in any hour between 10:00 p.m. and 7:00 a.m. shall be measured as continuous sound and meet the noise standard for the applicable zone.

Source: CMC Section 9.22.080, Table 3-1.

CMC Section 5.27.604 contains regulations on noise produced by construction activities, stating “construction activities are only permitted between the hours of 7:00 a.m. and 7:00 p.m. Monday through Friday and between 9:00 a.m. and 5:00 p.m. on Saturday and Sunday. From June 1st through September 15th, permitted construction activity may commence after 6:00 a.m. Monday through Friday. Extended construction work hours must at all times be in strict compliance with the permit”.

Neither the Clovis General Plan nor the CMC provides a quantitative construction noise threshold. Therefore, the limits specified in the FTA *Transit Noise and Vibration Impact Assessment Manual* (2018) were used to evaluate the project’s potential construction noise impacts. These construction noise limits are shown in Table 11.

Table 11 FTA Construction Noise Criteria

Land Use	L_{eq} , equip (8-hour), dBA	
	Day (7:00 a.m. to 10:00 p.m.)	Night (10:00 p.m. to 7:00 a.m.)
Residential	80	70
Commercial	85	85
Industrial	90	90

Notes:

dBA = A-weighted decibels; L_{eq} = equivalent noise level

Source: FTA 2018.

Based on the criteria shown in Table 11, construction noise would be significant if it were to exceed 80 dBA L_{eq} for an 8-hour period at residential uses, applied to the project property line. Additionally, construction noise would be considered significant if it were to occur outside of the allowable days and hours specified in CMC Section 5.27.604.

CMC Section 9.22.100 addresses vibration, stating “vibrations from temporary construction/demolition and vehicles that leave the subject parcel (e.g., trucks) are exempt from the provisions of this section”. In absence of a quantitative vibration threshold, vibration limits used in this analysis to determine potential vibration impacts to surrounding receptors during construction

are based on thresholds for vibration damage potential established in the *Transit Noise and Vibration Impact Assessment Manual* (FTA 2018). These vibration limits are shown in Table 12.

Table 12 FTA Vibration Damage Potential Criteria

Building Category	PPV (in/sec)
I. Reinforced concrete, steel, or timber (no plaster)	0.5
II. Engineered concrete and masonry (no plaster)	0.3
III. Nonengineered timber and masonry buildings	0.2
IV. Buildings extremely susceptible to vibration damage	0.12

Notes:

PPV = peak particle velocity; in/sec = inches per second

Source: FTA 2018

For a conservative analysis, construction vibration impacts would be significant if vibration levels exceed 0.2 in/sec PPV at the nearest offsite residential structures to the project site. This is the level at which minor architectural (i.e., non-structural) damage may occur to buildings of standard residential construction.

- a. *Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?*

Construction

Temporary noise levels caused by construction activity would be a function of the noise generated by construction equipment, the location and sensitivity of nearby land uses, and the timing and duration of noise-generating activities. For a construction noise assessment, construction equipment can be considered to operate in two modes: stationary and mobile. As a rule, stationary equipment operates in a single location for one or more days at a time, with either fixed-power operation (e.g., pumps, generators, and compressors) or variable-power operation (e.g., pile drivers, rock drills, and pavement breakers). Conversely, mobile equipment moves around the construction site with power applied in cyclic fashion, such as bulldozers, graders, and loaders (FTA 2018). Noise impacts from stationary equipment are assessed from the center of the equipment, while noise impacts from mobile construction equipment are assessed from the center of the equipment activity area (e.g., construction site). Due to the complex and mobile nature of construction activity within a project site, the FTA *Transit Noise and Vibration Impact Assessment Manual* document recommends evaluating construction noise impacts from the center of the construction site, stating that the distance variable in its recommended construction noise calculation “assumes that all equipment operates at the center of the project” (FTA 2018). Therefore, noise impacts resulting from construction of the project were evaluated at the approximate center of the site, assumed to be at the northern end of the proposed Service Yard parking lot, approximately 130 feet from the eastern project boundary.

Construction noise was estimated using the FHWA’s Roadway Construction Noise Model (RCNM). Typical construction projects have long-term noise averages that are lower than louder short-term noise events due to equipment moving from one point to another on the site, work breaks, and idle time. Each phase of construction has a specific equipment mix depending on the work to be carried out during that phase. Accordingly, each phase also has its own noise characteristics; some would have higher continuous noise levels than others, and some may have discontinuous high-impact

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noise levels. The maximum hourly L_{eq} of each phase is determined by combining the L_{eq} contributions from each piece of equipment used in that phase (FTA 2018). Project construction phases would include site preparation, grading, building construction, paving, architectural coating, and trenching/utilities. It is assumed that diesel engines would power all construction equipment. Noise levels generated during each phase of construction were estimated based on the default equipment list from CalEEMod (Appendix A). For a conservative evaluation of noise impacts, it was assumed that all equipment during each phase would be operating simultaneously.

Construction would occur between 7:00 a.m. and 3:30 p.m., Mondays through Fridays, and would therefore not conflict with the CMC. No weekend construction is expected.

Table 13 shows the estimated noise levels at nearby sensitive receptors per each phase of construction.

Table 13 Estimated Noise Levels at Sensitive Receptors by Construction Phase

Construction Phase	dBA L_{eq} (8-hr)			
	RCNM Reference Noise Level ¹	Single-family residences east of project site	Single-family residences south of project site	Community Day Elementary School west of project site
<i>Distance (ft)</i>	<i>50</i>	<i>130</i>	<i>375</i>	<i>965</i>
Demolition	89	80	71	63
Site Preparation	86	77	68	60
Grading	87	78	69	61
Building Construction	85	77	68	60
Paving	88	80	70	62
Architectural Coating	76	68	58	50
Trenching/Utilities	79	71	61	53

Notes:

Source: RCNM. See Appendix C for construction noise modeling results.

As shown in Table 13, construction noise levels would not exceed 80 dBA L_{eq} (8-hr) at the nearest sensitive receptors (single-family residences located to the east of the project site). Therefore, temporary noise impacts resulting from construction of the project would be less than significant.

Operation

Noise generated by operation of the project would result primarily from shop building activities (i.e., operation of tools and other machinery) and rooftop mounted mechanical equipment. Noise levels resulting from project operation were calculated at three receptor points, each representing the nearest residential property line relative to the locations of the project's mechanical equipment. Sensitive receptor 1 (SR 1) was placed on the eastern project boundary, situated approximately 20 feet east from the eastern façade of Building D and located at the approximate midpoint of Building D (when measured from north to south). SR 2 was placed on the southern project boundary, situated approximately ten feet south from the southern façade of Building D and located at the approximate midpoint of Building D (when measured from east to west). SR 3 was placed on the southern project boundary, situated approximately seven feet south from the southern façade of Building C and located at the approximate midpoint of Building D (when measured from east to west). These sources of noise are discussed further in the following sections.

Shop Building Activities

The project would feature three shop buildings (Buildings B, C, and D) that would each contain various tools and machinery. Based on the provided project site plan, shop activities occurring within Buildings C and D represent the greatest potential to generate high noise levels due to these buildings being located closest to nearby sensitive receptors. The equipment plans for these buildings show overhead doors along the east façade of Building C and along the west façade of Building D. During shop operations, these doors may be open, allowing noise produced inside these shop areas to transmit to the outside of the buildings and to nearby sensitive receptors. Therefore, this analysis assumes an open-doors scenario during operation. Additionally, the noise reduction provided by the presence of the project buildings and perimeter fence along the property line was conservatively not accounted for. Noise from shop building activities was not calculated at SR 1 as the project building closest to this receptor (Building D) would contain primarily storage and office rooms near SR 1. Based on the mechanical plans for this building, no noise-generating equipment would be located near SR 1, therefore, noise impacts at this receptor would be primarily due to the nearby rooftop HVAC equipment, not shop building activities.

The southern end of Building C would be used as a grounds environmental safety storage room and would include a Portacool fan, which represents the loudest noise source in this shop area. This piece of equipment generates a sound pressure level of 68 dBA at an assumed distance of three feet, per manufacturer specifications (Portacool 2024). Assuming this piece of equipment would operate with the nearest overhead door open, the noise level at the nearest residential property line to the south (located approximately 72 feet away) would attenuate to 40 dBA. At SR 2 and SR 3, this piece of equipment would produce noise levels of 31 and 40 dBA, respectively.

The southern end of Building D would be used as a concrete grading room and include a drill press, which represents the loudest noise source in this shop area. A drill press generates a sound pressure level of 72 dBA at three feet (Motor Safety Association 2021). Assuming this piece of equipment would operate with the nearest overhead door open, the noise level at the nearest residential property line to the south (located approximately 100 feet away) would attenuate to 42 dBA. At SR 2 and SR 3, this piece of equipment would produce noise levels of 40 and 36 dBA, respectively.

Therefore, noise generated by operation of tools and machinery within the project's shop buildings nearest to sensitive receptor property lines would not exceed the City's daytime or nighttime exterior noise limits of 55 and 50 dBA L_{eq} (15-minute), respectively. Long-term operational noise impacts due to shop building activities would be less than significant.

Stationary Mechanical Equipment

The project would include various pieces of mechanical equipment mounted on the rooftops of Buildings B, C, and D, as well as ground-mounted mechanical equipment at Buildings A and C. The primary noise-generating pieces of equipment associated with the project would include Trane condensing units, Champion evaporative coolers, and Greenheck exhaust fans. The noise output produced by the various equipment types was based on manufacturer-specified data for each piece of equipment. Each piece of equipment was assumed to act as a point source of noise, decreasing at a rate of 6 dBA per each doubling of distance away from the source. Additionally, all equipment was conservatively assumed to operate continuously for 24 hours a day, seven days a week.

At each receptor, the combined noise impact from the ten closest pieces of mechanical equipment was calculated. Note that only the ten nearest pieces of equipment to each receptor were accounted for, as the noise produced by each farther piece of equipment continues to decrease

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with distance and has a diminishing contribution to the overall noise level at each receptor. Furthermore, this analysis does not account for the effects of topography, buildings (and other structures), or the six-foot-tall rooftop parapet walls and the noise reduction these site features may provide; therefore, this analysis provides a conservative estimate of the project's noise impacts.

The project's operational noise impacts at each sensitive receptor are shown in Table 14, along with distances to each piece of mechanical equipment and the respective manufacturer and model information. As shown therein, operational noise generated by the project's mechanical equipment would reach up to approximately 46 dBA at the southern project property line near Building C (represented as SR 3); therefore, operational noise would not exceed the City's nighttime exterior noise limit of 50 dBA L_{eq} (15-minute) at the nearest residential property lines, and long-term operational noise impacts associated with the project's stationary mechanical equipment would be less than significant.

Table 14 Operational Noise Levels at Nearby Sensitive Receptors

Receptor	Equipment Manufacturer and Model	Equipment Noise Level (dBA)	Reference Distance (feet)	Distance to Individual Piece of Equipment (feet) ¹	Noise Level from Individual Equipment (dBA)	Combined Noise Level (dBA)	Exceeds City's Nighttime Exterior Noise Limit? ²
SR 1	Greenheck CUE-95-VG exhaust fan	61	3.3	35	40.7	47.9	No
	Greenheck CUE-90-VG exhaust fan	59	3.3	40	37.8		
	Trane NTXSKS12A112AA condensing unit	55	3.3	40	33.3		
	Champion 95DD evaporative cooler	65	3.3	49	41.6		
	Champion 75/85DD evaporative cooler	65	3.3	52	41.0		
	Greenheck CUE-95-VG exhaust fan	61	3.3	61	36.0		
	Trane NTXSKS18A112AA condensing unit	55	3.3	62	29.6		
	Greenheck CUE-95-VG exhaust fan	61	3.3	68	34.9		
	Trane NTXSKS24A112AA condensing unit	55	3.3	73	28.1		
	Champion 75/85DD evaporative cooler	65	3.3	78	37.5		
SR 2	Trane NTXSKS15A112AA condensing unit	51	3.3	27	32.7	46.9	No
	Champion 75/85DD evaporative cooler	65	3.3	36	44.3		
	Greenheck CUE-90-VG exhaust fan	59	3.3	44	36.9		
	Trane NTXSKS30A112AA condensing unit	55	3.3	55	30.5		
	Champion 75/85DD evaporative cooler	65	3.3	78	37.5		
	Greenheck CUE-90-VG exhaust fan	59	3.3	79	31.9		
	Greenheck CUE-95-VG exhaust fan	61	3.3	92	32.3		
	Champion 75/85DD evaporative cooler	65	3.3	111	34.5		
	Champion 75/85DD evaporative cooler	65	3.3	131	33.0		
Greenheck CUE-95-VG exhaust fan	61	3.3	151	28.0			
SR 3	Greenheck CUE-95-VG exhaust fan	61	3.3	28	42.8	48.3	No
	Champion 75/85DD evaporative cooler	65	3.3	32	45.3		
	Trane NTXSKS24A112AA condensing unit	55	3.3	79	27.4		

Clovis Unified School District

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Receptor	Equipment Manufacturer and Model	Equipment Noise Level (dBA)	Reference Distance (feet)	Distance to Individual Piece of Equipment (feet) ¹	Noise Level from Individual Equipment (dBA)	Combined Noise Level (dBA)	Exceeds City's Nighttime Exterior Noise Limit? ²
SR 3	Greenheck CUE-95-VG exhaust fan	61	3.3	94	32.1	48.3	No
	Champion 75/85DD evaporative cooler	65	3.3	109	34.6		
	Champion 75/85DD evaporative cooler	65	3.3	134	32.9		
	Greenheck CUE-95-VG exhaust fan	61	3.3	148	28.2		
	Greenheck CUE-95-VG exhaust fan	61	3.3	168	27.1		
	Trane NTXSKS30A112AA condensing unit	55	3.3	171	20.7		
	Greenheck CUE-120-VG exhaust fan	69	5.0	193	37.7		

Notes:

¹ Distance to individual piece of equipment based on diagonal path length from equipment to each receptor (includes both horizontal distance to receptor and vertical distance based on equipment's height on rooftop).

² As presented in Table 10, the City's nighttime exterior noise limit is 50 dBA L_{eq} (15-min) at residential land uses, as measured at the property line.

Combined Operational Noise Levels

During project operation, noise generated by shop building activities and rooftop mechanical equipment would occur simultaneously at certain times and combine to increase the noise level at nearby receptors. To account for this, the combined noise levels generated by shop building activities and rooftop mechanical equipment were estimated at SR 2 and SR 3. As explained above, the noise level at SR 1 would be primarily due to rooftop mechanical equipment, and noise from shop building activities would contribute much less comparatively to the noise level at this receptor.

At SR 2, shop building activities (40 dBA) and rooftop mechanical equipment (47 dBA) would result in a combined noise level of 48 dBA. At SR 3, shop building activities (41 dBA) and rooftop mechanical equipment (48 dBA) would result in a combined noise level of 49 dBA. Therefore, combined operational noise levels at nearby sensitive receptor property lines would not exceed the City's daytime or nighttime limit of 55 and 50 dBA, respectively. Combined operational noise impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- b. *Would the project result in generation of excessive groundborne vibration or groundborne noise levels?*

Construction

Construction activities known to generate excessive groundborne vibration, such as pile driving and blasting, would not be conducted during construction of the project. Therefore, the greatest known sources of vibration during project construction activities would be a vibratory roller and large earthmoving equipment (such as a backhoe, excavator, and grader). Based on the paved areas shown in Figure 3, a vibratory roller may be used as close as approximately 35 feet to the nearest offsite structure (single-family residences east of the project site). A vibratory roller generates a vibration level of approximately 0.210 in/sec PPV at a reference distance of 25 feet (FTA 2018), which would attenuate to approximately 0.127 in/sec PPV⁴ at 35 feet away. Large earthmoving equipment would be used as close as 18 feet from the nearest offsite structure (single-family residences along the southern project property line). This type of equipment generates a vibration level of approximately 0.089 in/sec PPV at a reference distance of 25 feet (FTA 2018), which would equate to approximately 0.146 in/sec PPV at 18 feet away. Vibration levels generated by use of a vibratory roller and large earthmoving equipment would not exceed the significance threshold of 0.2 in/sec PPV at the nearest offsite structures. Therefore, temporary vibration impacts associated with construction of the project would be less than significant.

Operation

Project operation would not include any substantial sources of vibration such as industrial or heavy truck operations. Therefore, no vibration impacts during operation of the project would occur.

LESS THAN SIGNIFICANT IMPACT

- c. *For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use*

⁴ $PPV_{Equipment} = PPV_{Ref} (25/D)^n$ (in/sec), PPV_{Ref} = reference PPV at 25 feet, D = distance, and $n = 1.1$

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airport, would the project expose people residing or working in the project area to excessive noise levels?

The closest public or public use airport to the project site is the Fresno-Yosemite International Airport located approximately 4.5 miles southeast of the project site. The project site is not located within the future (year 2022) noise contours of the airport shown on Exhibit D2 of the Fresno County Airport Land Use Compatibility Plan (Coffman Associates, Inc. 2018). Therefore, users and workers in the project vicinity would not be exposed to excessive aviation-related noise impacts and no impacts would occur.

NO IMPACT

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14 Population and Housing

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than - Significant Impact	No Impact
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Would the project:

a. Induce substantial unplanned population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

- a. *Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?*

The project would not involve the construction of new dwelling units and, therefore, would not directly induce population growth in the project area. The project is located on an infill site within the city of Clovis, surrounded by commercial development and residences. The proposed project would not increase total employment opportunities at CUSD, but would relocate existing employment opportunities to the project site. Given the small-scale nature of project construction activities, it is likely that construction workers would be drawn from the existing, regional workforce and would not indirectly result in the relocation of people to Clovis. Therefore, the proposed project would not induce population growth and would result in no impact.

NO IMPACT

- b. *Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?*

There are no existing housing units or temporary housing accommodations on the project site. Therefore, the project would not displace existing housing units or people. No impact would occur.

NO IMPACT

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15 Public Services

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than - Significant Impact	No Impact
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a. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the 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:

1	Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2	Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3	Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4	Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
5	Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a.1-5 Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities, or the need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?

As discussed in Environmental Checklist Section 14, *Population and Housing*, construction and operation of the proposed project would not result in direct or indirect population growth. The project would be required to comply with PRC Section 4291, the California Building Code, and other regulations which set forth standards for fire protection in buildings. As such, an increase in demand for fire services is not expected to result from the proposed project.

The proposed project would not result in the need for new or altered facilities for police protection, schools, libraries, or parks. The number of employees would not increase as a result of the proposed project as employees would be relocated from existing CUSD facilities in Clovis; thus, no increase in population would take place that would necessitate the construction of new or physically altered facilities. No feature of the proposed project would pose unusual police protection demands. Therefore, there would be no increase in the demand for public services such as police facilities, schools, libraries, or parks.

Overall, the proposed project would not result the need for new or physically altered facilities, the result of which could cause significant environmental impacts. No impact to public services would occur.

NO IMPACT

16 Recreation

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than - Significant Impact	No Impact
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The City of Clovis maintains approximately 160 acres of developed park space, ranging from 0.06 acre to 17.9 acres and providing a variety of amenities and facilities, such as playgrounds, shelters, picnic tables, sports fields, drinking fountains, restrooms, and parking (City of Clovis 2014b). The nearest park to the project site is Sierra Bicentennial Park, approximately 1.3 miles southwest of the project site.

- 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?*

As discussed in Environmental Checklist Section 14, *Population and Housing*, the proposed project would not directly or indirectly induce population growth. As such, the proposed project would not generate demand for parks or cause substantial deterioration of existing parks. Additionally, proposed project activities would not preclude the ability of residents to access recreational opportunities within the region, thereby necessitating the construction or expansion of recreational facilities. Therefore, the proposed project would have no impact on recreation.

NO IMPACT

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17 Transportation

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than - Significant Impact	No Impact
Would the project:				
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a. *Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?*

Potential impacts to the circulation system would be primarily associated with construction personnel traveling to and from the project site, delivery trips for heavy equipment and construction tools, and trips to dispose of debris and soil. Construction-related vehicle trips would be temporary and would cease once construction is complete. Construction would not require road closures or result in substantial interruption of the existing circulation system because construction vehicles and equipment would be staged on the project site away from existing transportation facilities.

The City’s General Plan establishes a level of service (LOS) D as the acceptable level of traffic congestion on most major streets. The Traffic Impact Analysis completed for Phase I in June 2023 (Odell Planning and Research, Inc. 2023) determined that Phase I would generate a maximum of 1,983 daily vehicle trips, which would not exceed the LOS D standard for local roadways. Operation of Phase II would generate approximately 361 new vehicle trips per day (Appendix A). Therefore, it can be inferred that similar to Phase I, Phase II would not exceed LOS D for local roadways, including North Fowler Avenue and Herndon Avenue, during project operation, as Phase II would involve fewer daily vehicle trips than Phase I. Operation of the proposed project would thus be consistent with circulation policies of the City’s General Plan. Because the proposed project would not interfere with existing transit, roadway, bicycle, or pedestrian facilities, the proposed project would not conflict with a program, plan, ordinance or policy addressing the circulation system. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- b. *Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?*

CEQA Guidelines Section 15064.3(b) identifies criteria for evaluating transportation impacts. Specifically, the guidelines state that VMT exceeding an applicable threshold of significance may indicate a significant impact. Construction of the proposed project would result in short-term, temporary vehicle trips to and from the project site during the construction period. These temporary vehicle trips would not result in long-term changes to VMT within Clovis; therefore, construction of the proposed project would not generate VMT inconsistent with CEQA Guidelines Section 15064.3(b).

According to the City's *Transportation Impact Analysis Guidelines* (2022), projects that generate or attract fewer than 500 vehicle trips per day are presumed to cause a less than significant VMT impact. The proposed project would generate approximately 361 vehicle trips per day (Appendix A). Therefore, operation of the proposed project would not be inconsistent with CEQA Guidelines Section 15064.3(b). Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- c. *Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment)?*

The proposed project would not alter or affect the existing street and intersection network in its vicinity, and would add an internal circulation road for access to the proposed buildings. Equipment staging would occur on the project site and construction personnel would park on the project site, minimizing the potential for construction-related vehicles and equipment to create a dangerous intersection. Construction and operation of the proposed project would not involve incompatible uses such as farm equipment. No new roadway facilities or features would be included as part of the proposed project. Therefore, the proposed project would not substantially increase hazards due to a geometric design feature or incompatible use. No impact would occur.

NO IMPACT

- d. *Would the project result in inadequate emergency access?*

The proposed project would not result in modifications to existing roadways or modifications to existing street parking. Two driveways would provide access to the project site—one located on the south side of Herndon Avenue, and one located on the east side of North Fowler Avenue. Staging equipment and temporary work areas utilized during construction of the proposed project would be located within the project site and would not be located in the public right-of-way, nor would the project require closure of existing roadways in the vicinity of the proposed project. Furthermore, the Clovis Fire Department would review project plans to ensure adequate emergency access is provided. The proposed project would have no impact involving inadequate emergency access.

NO IMPACT

18 Tribal Cultural Resources

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

a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Environmental Setting

California AB 52 of 2014 expanded CEQA by defining a new resource category, “tribal cultural resources.” AB 52 establishes that “A project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment” (PRC Section 21084.2). It further states that the lead agency shall establish measures to avoid impacts that would alter the significant characteristics of a tribal cultural resource, when feasible (PRC Section 21084.3).

PRC Section 21074 (a)(1)(A) and (B) defines tribal cultural resources as “sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe” and is:

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

AB 52 establishes a formal consultation process for California tribes regarding those resources. The consultation process must be completed before a CEQA document can be certified. Under AB 52, lead agencies are required to “begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project.” Native American tribes to be included in the process are those that have requested notice of projects proposed within the jurisdiction of the lead agency. The IS-MND for Phase I of the project, completed in 2023, included the Phase II site; consequently, AB 52 consultation completed for Phase I also suffices for Phase II.

CUSD sent AB 52 notification letters on November 21, 2022 to the twelve tribes listed by the NAHC SLF, including the Big Sandy Rancheria of Western Mono Indians, Cold Springs Rancheria of Mono Indians, Dumna Wo-Wah Tribal Government, Kings River Choinumni Farm Tribe, North Fork Rancheria of Mono Indians, North Valley Yokuts Tribe, Picayune Rancheria of Chukchansi Indians, Santa Rosa Rancheria Tachi Yokut Tribe, Table Mountain Rancheria, Traditional Choinumni Tribe, Tule River Indian Tribe, and Wuksache Indian Tribe/Eshom Valley Band.

Impact Analysis

- a. *Would the project cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code Section 21074 that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?*
- b. *Would the project cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code 21074 that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1?*

The NAHC SLF request was returned with negative results via a letter dated November 17, 2022 and twelve tribes were identified on the Fresno County Native American Contact List. CUSD sent AB 52 notification letters on November 21, 2022 to the twelve tribes listed by the NAHC SLF letter; only one tribal response was received, from the Santa Rosa Rancheria Tachi-Yokut Tribe, which deferred to tribes more local to the project site. As discussed in Environmental Checklist Section 5, *Cultural Resources*, the project site is considered to have low archaeological sensitivity and a low potential for encountering subsurface archaeological resources. CUSD has complied with the requirements of AB 52, and no tribal cultural resources have been identified on the project site.

There is always potential to uncover previously unidentified buried archaeological or Native American resources during ground disturbing activities, which could potentially be considered tribal cultural resources. Should project construction activities encounter and damage or destroy a tribal cultural resource or resources, impacts would be potentially significant. Mitigation Measure TCR-1 would ensure that tribal cultural resources are preserved in the event they are uncovered during

construction and would reduce impacts regarding disrupting tribal cultural resources to a less than significant level.

Mitigation Measure

TCR-1 Treatment of Inadvertent Tribal Cultural Resource Discoveries During Construction

In the event that cultural resources of Native American origin are identified during ground-disturbing activities, all earth disturbing work within 50 feet of the find shall be temporarily suspended or redirected until a qualified archaeologist has evaluated the nature and significance of the find; an appropriate Native American representative, based on the nature of the find, is consulted; and mitigation measures are put in place for the disposition and protection of any find pursuant to PRC Section 21083.2. If CUSD, in consultation with local Native Americans, determines that the resource is a tribal cultural resource and thus significant under CEQA, a mitigation plan shall be prepared and implemented in accordance with state guidelines and in consultation with local Native American group(s) prior to continuation of any earth disturbing work within the vicinity of the find. The plan shall include avoidance of the resource or, if avoidance of the resource is infeasible, shall outline the appropriate treatment of the resource in coordination with the appropriate local Native American tribal representative and, if applicable, a qualified archaeologist. Examples of appropriate mitigation for tribal cultural resources include, but are not limited to, protecting the cultural character and integrity of the resource, protecting traditional use of the resource, protecting the confidentiality of the resource, or heritage recovery.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

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19 Utilities and Service Systems

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than - Significant Impact	No Impact
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Would the project:

a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a. *Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?*

The project area is already supported by a robust utility infrastructure. PG&E would provide electricity to the project site (PG&E 2024). The City of Clovis would provide water and wastewater services. FMFCD would provide stormwater drainage services (County of Fresno 2000).

Given that the necessary utility systems are well-established and capable of accommodating the proposed development, no substantial new construction or relocation of water, wastewater, storm drainage, electric power, natural gas, or telecommunications facilities is anticipated. Consequently,

the project would not necessitate the relocation or construction of new or expanded water, wastewater treatment, storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects. This impact would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

- b. Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?*

The City of Clovis sources its water from both groundwater in the Kings Subbasin of the San Joaquin Valley Groundwater Basin and treated surface water from the Fresno Irrigation District, which is processed at the Clovis Surface Water Treatment Facility (City of Clovis 2021). According to the City's 2020 Urban Water Management Plan, the projected water supply is 50,739 acre-feet (AF) in 2025, 58,937 AF in 2030, 65,034 AF in 2035, and 74,650 AF in 2040. The projected water demand is 36,637 AF in 2025, 37,324 AF in 2030, 40,122 AF in 2035, and 43,198 AF in 2040. Therefore, the City's projected water supply exceeds demand estimates through 2040 (City of Clovis 2021).

The project site, designated for General Commercial use under the City's General Plan, has been included in the City's water supply planning efforts. The proposed project would increase water demand by approximately 22.4 AF per year (Appendix A). Therefore, the City would have sufficient water supplies available to serve the project and reasonably foreseeable development. This impact would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

- c. Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?*

The City of Clovis would provide wastewater collection services, with treatment occurring at the Fresno-Clovis Regional Wastewater Treatment Plant (RWTP). This facility is operated by the City of Fresno and regulated under the Central Valley Regional Water Quality Control Board's waste discharge requirements. The RWTP treats approximately 68 million gallons of wastewater per day (City of Fresno 2024) and has a treatment capacity of approximately 88 million gallons per day (City of Fresno 2016). The proposed project would generate approximately 0.02 million gallons of wastewater per day (Appendix A), which is well within the RWTP's remaining treatment capacity of approximately 20 million gallons. Therefore, the project would not result in a determination by the City that it does not have adequate capacity to serve the project's wastewater demand, and impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

- d. Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?*
- e. Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?*

Construction of the project would generate construction-related waste, including construction materials and debris. These materials would be disposed of at the City of Clovis Landfill. The City of Clovis Landfill has a maximum permitted capacity of 2,000 tons per day and a remaining capacity of

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7.74 million cubic yards and is estimated to have a cease operation date of 2047 (CalRecycle 2024b). The City of Clovis Landfill has sufficient permitted capacity to accommodate the proposed project’s temporary solid waste disposal needs associated with construction activities. Furthermore, construction waste would be minimized pursuant to AB 939, which requires recoverable materials generated during construction to be separated and recycled to minimize construction waste.

Operation of the project would generate approximately 0.09 tons of solid waste per day (Appendix A), which is well within the City of Clovis Landfill’s remaining capacity of 7.74 million cubic yards. The proposed project would produce minimal waste during construction and operation and comply with all applicable statutes and regulations related to solid waste. Therefore, impacts related to solid waste would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

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20 Wildfire

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than - Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Expose people or structures to significant risks, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The project site is not in a designated very high fire hazard severity zone. The nearest very high fire hazard severity zone is approximately 16 miles northeast of the site, and the nearest moderate hazard severity zone is located approximately 4.5 miles northeast of the site (California Department of Forestry and Fire Protection [CAL FIRE] 2024a). The project site is not located in a state responsibility area, with the nearest state responsibility area approximately 5 miles to the northeast (CAL FIRE 2024b).

Impact Analysis

- a. *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project substantially impair an adopted emergency response plan or emergency evacuation plan?*

The project is not within a very high fire hazard severity zone or state responsibility area (CAL FIRE 2024a; 2024b). As described in Environmental Checklist Section 9, *Hazards and Hazardous Materials*, project construction and operation would not restrict implementation of any emergency

response plans. No roads would be permanently closed because of the proposed project, and no structures would be developed that could potentially impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. As such, project implementation would not interfere with existing emergency evacuation plans or emergency response plans in the area. Therefore, no impact would occur.

NO IMPACT

- b. *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?*

The project site and its surrounding area is on level terrain in an urban area. No steep slopes or other fire hazard elements are in the surrounding area and would not exacerbate the risk to fire. The project site is nearly 16 miles away from the nearest very high fire hazard severity zone (CAL FIRE 2024a). The project is not within a high or very high fire hazard severity area, or a state responsibility area (CAL FIRE 2024b). Therefore, no impact would occur.

NO IMPACT

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

The project is not near state responsibility areas or lands classified as very high fire hazard severity zones; therefore, there would be no impact.

NO IMPACT

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

The project is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones, or in an area with slopes or any elevation change. As discussed in Environmental Checklist Section 10, *Hydrology and Water Quality*, although the proposed project would introduce impervious surfaces to the site, it would not increase the volume of stormwater runoff from the site that could create downstream flooding or landslides, and there are no slopes to be affected. Implementation of design BMPs in the final design phase of the project, would ensure minimal erosion, siltation, flooding, and polluted runoff occur from development of the site. Therefore, there would be no impact.

NO IMPACT

21 Mandatory Findings of Significance

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than - Significant Impact	No Impact
Does the project:				
a. Have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. 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)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

As discussed in Environmental Checklist Section 4, *Biological Resources*, the project would not have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or substantially reduce the number or restrict the range of a rare or endangered plant or animal. In addition, as discussed in Environmental Checklist Section 5, *Cultural Resources*, the project would not eliminate important examples of the major periods of California history or prehistory. The project would have no impact.

NO IMPACT

- 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)?*

Cumulative impacts are defined as two or more individual (and potentially less than significant) project effects which, when considered together or in concert with other projects, combine to result in a significant impact within an identified geographic area. Cumulatively considerable impacts could occur if the construction of other projects occurs at the same time as the proposed project and in the same vicinity, such that the effects of similar impacts of multiple projects combine to expose adjacent sensitive receptors to greater levels of impact than would occur under the proposed project. For example, if the construction of other projects in the area occurs at the same time as construction of the proposed project, potential impacts associated with noise and traffic in the project area may be more substantial. Cumulative development in the vicinity of the project site includes the following (City of Clovis 2024b):

- **CUSD District Facilities Phase I.** This project consists of construction of a special education administration building (24,167 sf), an online school building (27,399 sf) and associated site improvements, located directly to the west of the Phase II project site.

Project impacts are primarily temporary, localized effects that would occur during construction activities. As discussed throughout this IS-MND, the project would result in no impacts to agriculture and forestry resources, land use and planning, mineral resources, population and housing, public services, recreation, and wildfire, and therefore the project would not contribute to cumulative impacts to these resources. The potential for the project to contribute to cumulative impacts would be limited to the infrequent periods of project activities and the following specific issue areas, for which the project is anticipated to have less than significant impacts (with or without mitigation):

- **Aesthetics:** Cumulative development in the region could continue to change the existing visual landscape. However, cumulative projects in the vicinity of the project site would not result in the addition of tall structures that could interfere with public views in the area. Cumulative development would be subject to existing regulations governing scenic character, including the City’s General Plan. Therefore, cumulative impacts related to aesthetics would not be significant.
- **Air Quality:** Because the SJVAB is designated as nonattainment for the state one-hour ozone standard and PM₁₀ standard, and nonattainment for the federal and state eight-hour ozone standard and PM_{2.5} standard, significant cumulative air quality impacts currently exist for these pollutants. As discussed in Environmental Checklist Section 3, *Air Quality*, the proposed project would not generate emissions of these air pollutants which exceed the SJVAPCD significance thresholds, which are intended to assess whether a project’s contribution to existing cumulative air quality impacts is considerable. Therefore, the project’s contribution to significant cumulative air quality impacts would not be cumulatively considerable.
- **Biological Resources:** Cumulative development in the region would continue to disturb areas with the potential to contain or provide habitat for biological resources. Cumulative development projects have undergone or would be required to undergo CEQA review, which would determine the extent of potential biological resources impacts and mitigate those impacts appropriately. If these cumulative projects would result in impacts to biological resources, impacts to such resources would be addressed on a case-by-case basis. Given the uncertainty in the extent of impacts associated with these projects, this analysis conservatively

assumes a significant cumulative impact to biological resources would occur. However, the proposed project would result in less-than-significant impacts to biological resources, and consequently, would not result in a cumulatively considerable contribution to this cumulative impact.

- **Cultural Resources:** Cumulative development in the region would continue to disturb areas with the potential to contain cultural and tribal cultural resources. As mentioned above, cumulative development projects have undergone or would be required to undergo CEQA review, which would determine the extent of potential cultural resources impacts and mitigate those impacts appropriately. If cumulative projects would result in impacts to known or unknown cultural resources, impacts to such resources would be addressed on a case-by-case basis. Given the uncertainty in the extent of impacts associated with these projects, this analysis conservatively assumes a significant cumulative impact to cultural resources would occur. Nevertheless, the proposed project would be required to implement Mitigation Measure CUL-1 to reduce its impacts to cultural resources to a less-than-significant level such that project-level impacts would not result in a cumulatively considerable contribution to this cumulative impact.
- **Energy:** Cumulative development in the region would use energy resources during both construction and operation. Similar to the proposed project, cumulative project construction would be subject to existing regulations that would minimize inefficient, wasteful, or unnecessary fuel consumption. Furthermore, in the interest of cost-efficiency, cumulative project construction contractors would not be anticipated to utilize fuel in a manner that is wasteful or unnecessary. Cumulative project operations would not substantially increase energy usage. Therefore, cumulative impacts related to energy would not be significant.
- **Geology and Soils:** Cumulative development in the region would continue to disturb areas with the potential to contain paleontological resources. As discussed above, cumulative development projects have undergone or would be required to undergo CEQA review, which would determine the extent of potential paleontological resources impacts and mitigate those impacts appropriately. This analysis conservatively assumes a significant cumulative impact to paleontological resources would occur. Nevertheless, the proposed project would be required to implement Mitigation Measure GEO-1 to reduce its impacts to paleontological resources to a less-than-significant level such that project-level impacts would not result in a cumulatively considerable contribution to this cumulative impact.
- **Greenhouse Gas Emissions:** GHG emissions and climate change are, by definition, cumulative impacts. As discussed in Environmental Checklist Section 8, *Greenhouse Gas Emissions*, the adverse environmental impacts of cumulative GHG emissions, including increased average temperatures, more drought years, and more frequent large wildfires, are already occurring. As a result, cumulative impacts related to GHG emissions are significant. Thus, the issue of climate change involves an analysis of whether a project's contribution towards an impact is cumulatively considerable. As discussed in Environmental Checklist Section 8, *Greenhouse Gas Emissions*, project emissions would be consistent with adopted plans and would therefore not be cumulatively considerable.
- **Hazards and Hazardous Materials:** Similar to the proposed project, cumulative projects would be required to comply with regulations applicable to the use, disposal, and transportation of hazardous materials during construction activities, and compliance with applicable regulations would reduce potential cumulative impacts to less-than-significant levels. With respect to the use and accidental release of hazardous materials in the environment during construction, effects are generally limited to site-specific conditions. Therefore, cumulative impacts related to accidental release of hazardous materials would not be significant.

- **Hydrology and Water Quality:** As discussed in Environmental Checklist Section 10, *Hydrology and Water Quality*, the project's construction-related water quality impacts would be less than significant with SWPPP implementation and regulatory compliance. The cumulative project listed above would have less than significant impacts related to hydrology and water quality, as it would be required to comply with existing NPDES regulations to ensure it does not result in substantial erosion or stormwater discharges that would substantially affect water quality in the area. Implementation of these regulations minimizes and avoids the potential for cumulative impacts to occur. Therefore, cumulative impacts related to hydrology and water quality would not be significant.
- **Noise:** Cumulative development projects may occur at the same time as the proposed project. Similar to the proposed project, cumulative projects would be required to comply with CMC noise standards, which would limit construction noise. Furthermore, cumulative projects may implement noise reduction mitigation measures to further reduce the project-specific noise impacts. The project site is located adjacent to commercial areas, and the commercial use of the site during operation would not represent a substantial increase in ambient noise that would be unusual for the project area. Therefore, cumulative impacts related to noise would not be significant.
- **Transportation:** The cumulative development projects listed above may occur at the same time as the proposed project. However, the cumulative development projects and the proposed project would not increase traffic levels such that they would result in a significant cumulative transportation impact.
- **Utilities and Service Systems:** As discussed under Environmental Checklist Section 19, *Utilities and Service Systems*, the existing water, wastewater, and solid waste facilities have sufficient capacity to serve both the project as well as reasonably foreseeable cumulative development. Therefore, cumulative impacts to utilities and service systems would not be significant.

Given the above discussion, the proposed project would not result in a cumulatively considerable contribution to a significant cumulative impact with mitigation incorporated.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

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

In general, impacts to human beings are associated with such issues as air quality, hazards and hazardous materials, noise, and wildfire impacts. As detailed under Environment Checklist Section 3, *Air Quality*, Section 9, *Hazards and Hazardous Materials*, Section 13, *Noise*, and Section 20, *Wildfire*, the proposed project would not result, either directly or indirectly, in substantial adverse effects related to air quality, hazardous materials, and noise with implementation of Mitigation Measures HAZ-1 through HAZ-3. Therefore, impacts to human beings would be less than significant with mitigation incorporated.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

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