
**California Environmental Quality Act
Initial Study**

New District Facilities Project

Lead Agency and Project Sponsor



Clovis Unified School District

1450 Herndon Avenue
Clovis, CA 93611-0599
www.cusd.com

Environmental Consultant

ODELL *Planning*  *Research, Inc.*

49346 Road 426, Suite 2
Oakhurst, CA 93644
www.odellplanning.com

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Executive Summary

The Clovis Unified School District (District) proposes to construct and operate new District facilities on 16.61 acres located southeast the intersection of North Fowler and East Herndon Avenues in the City of Clovis (City), Fresno County (County), California (APN: 491-050-74ST, 550-020-45T, and 550-020-47T). The first phase would include the construction of a Special Education Administration building (24,167 square feet), an Online School building (27,399 square feet) and associated site improvements. A future phase would consist of the construction and operation of District administrative offices in several buildings totaling approximately 90,000 square feet. The new Special Education Administration facility will include a reception/lobby area; offices for administration, operations, and school services; meeting conference and break rooms; and will house the Clovis Infant Toddler Intervention (CITI) Kids program. The new Online School facility will include a reception/lobby area, administrative offices, flex rooms, teacher offices, STEM (Science, Technology, Engineering, and Math) lab, computer lab, nurse station and conference room. Construction of Phase 1 will begin in Fall 2023 and is anticipated to be completed and operational by Fall 2024. The timing for future phase development is undetermined.

The Special Education facility would employ 55 employees during the week, except for 62 employees on Monday. The Online School facility would employ 50 employees daily throughout the week. Under Phase 1, the total employment will range from 105 to 112. Instructors would be on campus from 8:00 to 3:00 PM. There will be about 30 students and 30-40 parents in the Special Education facility during the day. Student instruction at the Online School would be about 100 students per day. Students would come and go at different times during the day. Also, about 30-40 student/parent intake sessions would occur daily. Each year, for three weeks, testing for 400-500 students would occur in the online school building. During this testing period, students would come and go throughout the day.

The conclusions of the Initial Study are as follows:

1. The Initial Study identified potentially significant environmental effects of the project in the following subject areas: aesthetics, air quality, biological resources, cultural resources, greenhouses gas, and noise. The District can avoid or reduce to an insignificant level these impacts by incorporating in the project the mitigation measures listed in Table 1 below.
2. The project would have a less than significant impact or no impact on many of the environmental resources and conditions evaluated in the Initial Study. The Initial Study explains why there would be no impacts, or why the impacts would be less than significant.
3. Based on items 1 and 2, above, the District should adopt a Mitigated Negative Declaration for the project.

Table 1
Summary Table of Mitigation Measures

Aesthetics: Mitigation for Potential Lighting Impacts

Mitigation Measure AE-1: All parking area lighting shall have full cut-off type fixtures. A full cut-off type fixture is a luminaire or lighting fixture that, by the design of the housing, does not allow any light dispersion or direct glare to shine above a 90-degree horizontal plane from the base of the fixture. Full cut-off type fixtures must be installed in a horizontal position as designed.

Mitigation Measure AE-2: All external signs and lighting shall be lit from the top and shine downward except where uplighting is required for safety or security purposes. The lighting shall also be, as much as physically possible, contained to the target area.

Mitigation Measure AE-3: Exterior building lighting for security or aesthetics shall be a full cut-off or a shielded type design to minimize any upward distribution of light.

Mitigation Measure AE-4: Non-essential lighting shall be turned off by 10:00 pm.

Air Quality: Mitigation for Potential Construction Impacts to Nearby Sensitive Receptors

Mitigation Measure AQ-1: The following measures shall be implemented to reduce the potential exposure of nearby sensitive receptors to localized PM concentrations associated with project construction:

- a. Fleet owners of mobile construction equipment are subject to the ARB Regulation for In-Use Off-Road Diesel Vehicles (Title 13, California Code of Regulations (CCR), §2449), the purpose of which is to reduce NOx, DPM, and other criteria pollutant emissions from in-use off-road diesel-fueled vehicles. Off-road heavy-duty trucks shall comply with the State Off-Road Regulation.
- b. Fleet owners of mobile construction equipment are subject to the ARB Regulation for In-Use (On-Road) Heavy-Duty Diesel-Fueled Vehicles (Title 13, CCR, §2025), the purpose of which is to reduce DPM, NOx, and other criteria pollutants from in-use (on-road) diesel-fueled vehicles. On-road heavy-duty trucks shall comply with the State On-Road Regulations.
- c. All commercial off-road and on-road diesel vehicles are subject, respectively, to Title 13, CCR, §2449(d)(3) and §2485, limiting engine idling time. Idling of heavy-duty diesel construction equipment and trucks during loading and unloading shall be limited to five minutes; electric auxiliary power units should be used whenever locally available.
- d. Diesel equipment meeting the ARB Tier 3 or higher emission standards for off-road heavy-duty diesel engines shall be used to the extent locally available.
- e. On-road heavy-duty equipment with the model year 2010 engines or newer shall be used to the extent locally available.
- f. Diesel-powered equipment shall be replaced by electric equipment whenever available.
- g. Equipment/vehicles using alternative fuels, such as compressed natural gas (CNG), liquefied natural gas (LNG), propane, or biodiesel, shall be used on-site where locally available.
- h. Catalytic converters shall be installed on gasoline-powered equipment, if available, following the manufacturer's recommendations.
- i. All construction equipment shall be maintained in tune with the manufacturer's specifications.
- j. The engine size of construction equipment shall be the minimum practical size.
- k. The number of construction equipment operating simultaneously shall be minimized through efficient management practices to ensure that the smallest practical number is operating at any one time.

- I. The proposed project shall comply with SJVAPCD Regulation VIII for the control of fugitive dust emissions. Regulation VIII can be obtained on the SJVAPCD's website at the website URL: <https://www.valleyair.org/rules/1ruleslist.htm>. At a minimum, the following measures shall be implemented:
 1. All disturbed areas, including storage piles, which are not being actively utilized for construction purposes, shall be effectively stabilized of dust emissions using water, chemical stabilizer/suppressant, and covered with a tarp or other suitable cover or vegetative ground cover.
 2. All on-site unpaved roads and off-site unpaved access roads shall be effectively stabilized of dust emissions using water or chemical stabilizer/suppressant.
 3. All land clearing, grubbing, scraping, excavation, land leveling, grading, cut & fill, and demolition activities shall be effectively controlled of fugitive dust emissions utilizing the application of water or by presoaking.
 4. When materials are transported off-site, all material shall be covered or effectively wetted to limit visible dust emissions, and at least six inches of freeboard space from the top of the container shall be maintained.
 5. All operations shall limit or expeditiously remove the accumulation of mud or dirt from adjacent public streets at the end of each workday. (The use of dry rotary brushes is expressly prohibited except where preceded or accompanied by sufficient wetting to limit the visible dust emissions.) (Use of blower devices is expressly forbidden.)
 6. Following the addition of materials to, or the removal of materials from, the surface of outdoor storage piles, said piles shall be effectively stabilized of fugitive dust emissions utilizing sufficient water or chemical stabilizer/suppressant.
 7. On-road vehicle speeds on unpaved surfaces of the project site shall be limited to 15 mph.
 8. Sandbags or other erosion control measures shall be installed sufficiently to prevent silt runoff to public roadways from sites with a slope greater than one percent.
 9. Excavation and grading activities shall be suspended when winds exceed 20 mph (Regardless of wind speed, an owner/operator must comply with Regulation VIII's 20 percent opacity limitation).

Biological Resources: Mitigation for Potential Impacts to On-Site Wildlife

Mitigation Measure BR-1: Some wildlife species are attracted to den-like structures such as pipes and may enter stored pipes, becoming trapped or injured. All construction pipes, culverts, or similar structures with a diameter of 4 inches or greater that are stored at a construction site for one or more overnight periods should be thoroughly inspected for wildlife before the pipe is subsequently buried, capped, or otherwise used or moved in any way.

Mitigation Measure BR-2: To prevent inadvertent entrapment of wildlife while work is being conducted, the contractor should cover all excavated, steep-walled holes or trenches more than 2 feet deep at the close of each working day with plywood or similar materials or provide one or more escape ramps constructed of earth fill or wooden planks. Before such holes or trenches are filled, the contractor should thoroughly inspect them for trapped animals.

Mitigation Measure BR-3: All trash and food items should be discarded into closed containers and properly disposed of at the end of each workday.

Cultural Resources: Mitigation for Potential Impacts to Subsurface Cultural Resources

Mitigation Measure CR-1: If cultural resources are encountered during ground disturbing construction activities, work shall stop in the immediate vicinity of the find and a qualified cultural resources specialist shall be consulted to determine the significance of the resources in accordance with CEQA Guidelines §15064.5. If potentially significant, the specialist shall make recommendations to the District

on mitigation measures to be implemented to protect the discovered resources in accordance with CEQA Guidelines §15064.5 and Public Resources Code §21083.2. If human remains are encountered during ground disturbing activities, work shall stop in the immediate vicinity of the find and the County Coroner notified in accordance with Health and Safety Code §7050.5 and CEQA Guidelines §15064.5(e). If the remains are determined to be of Native American descent, the procedures and requirements set forth in CEQA Guidelines §15064.5(d) and (e) and Public Resources Code §5097.98 shall be implemented.

Greenhouse Gas: Mitigation for Potential Greenhouse Gas Emissions

Mitigation Measure GHG-1: In addition to the implementation of Mitigation Measure AQ-1, the following additional measures shall be implemented to ensure the project includes BMPs:

- a. Building mechanical equipment and appliances shall be electrically powered. The installation of natural-gas service/infrastructure shall be prohibited.
- b. Meet current CALGreen Tier 2 standards for electric vehicle (EV) parking spaces, except that all EV parking spaces required by the code shall be “EV-capable” instead of “EV-ready”.

Noise: Mitigation for Potential Noise Impacts

Mitigation Measure N-1: The following measures shall be implemented to reduce construction-generated noise levels:

- a. Construction activities (excluding activities that would result in a safety concern to the public or construction workers) shall be limited to between the hours of 7:00 a.m. and 7:00 p.m. Monday through Friday and between 9:00 a.m. and 5:00 p.m. Saturday and Sunday. Additionally, from June 1st through September 15th permitted construction hours shall be limited to between the hours of 6:00 a.m. and 7:00 p.m. Monday through Friday.
- b. Construction truck trips shall be scheduled, to the extent feasible, to occur during non-peak hours and truck haul routes shall be selected to minimize impacts to nearby residential dwellings.
- c. Construction equipment shall be properly maintained and equipped with noise-reduction intake and exhaust mufflers and engine shrouds, following manufacturers’ recommendations. Equipment engine shrouds shall be closed during equipment operation.
- d. Stationary construction equipment (e.g., portable power generators) should be located at the furthest distance possible from nearby residences. If deemed necessary, portable noise barriers shall be erected sufficiently to shield nearby residences from the direct line-of-sight of stationary construction equipment.
- e. When not in use, all equipment shall be turned off and shall not be allowed to idle. Provide clear signage that posts this requirement for workers at the entrances to the site.

Mitigation Measure N-2: The following measures shall be implemented to reduce long-term operational noise impacts:

- a. Building mechanical equipment (e.g., HVAC units) associated with the proposed buildings shall be shielded from direct line-of-sight of nearby residential land uses. It is recommended that air conditioning units be located on roof-top areas and shielded from the line of sight of nearby residential land uses by incorporation of shielding or building parapets along the perimeter of the roof.
- b. Mechanical equipment placed on roof-top areas shall include at a minimum a 5-foot set back.

A. Project Background Information

1. Project Title, Lead Agency, and Lead Agency Contact Information

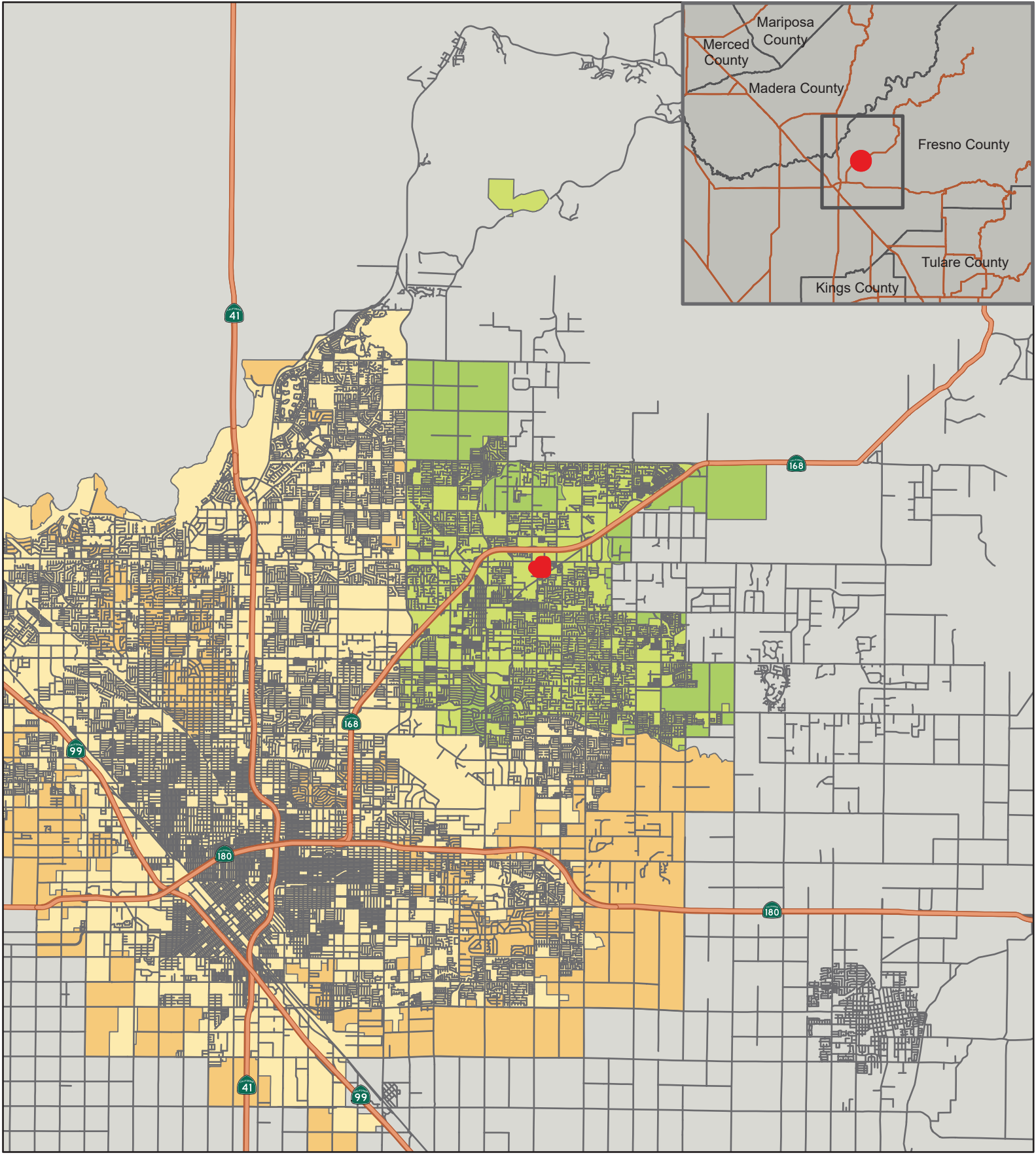
- Project Title: New District Facilities Project
- Lead Agency: Clovis Unified School District
- Contact: Denver Stairs
Assistant Superintendent, Facility Services
Clovis Unified School District
1450 Herndon Avenue, Clovis, CA 93611
Phone: (559) 327-9260
Email: denverstairs@cusd.com

2. Project Location

The project site is located on 16.61 acres southeast of the intersection of North Fowler Avenue and East Herndon Avenue, in the City of Clovis, Fresno County, California (see Figures 1 and 2 and Table 2).

Table 2
Project Location

City	Clovis
County	Fresno
Zip Code	93611
Assessor's Parcel Number	APN: 491-050-74ST, 550-020-45T, 550-020-47T
Nearest Existing Major Cross Streets	E. Herndon Avenue and N. Fowler Avenue
Elevation	Approximately 360 ft. AMSL
USGS Map	Clovis USGS 7.5-minute quadrangle
Section, Township & Range	Township 13S, Range 21E, Sections 3 and 4
Latitude/Longitude	36°83'59"N, -119°68'18"W





Project Location

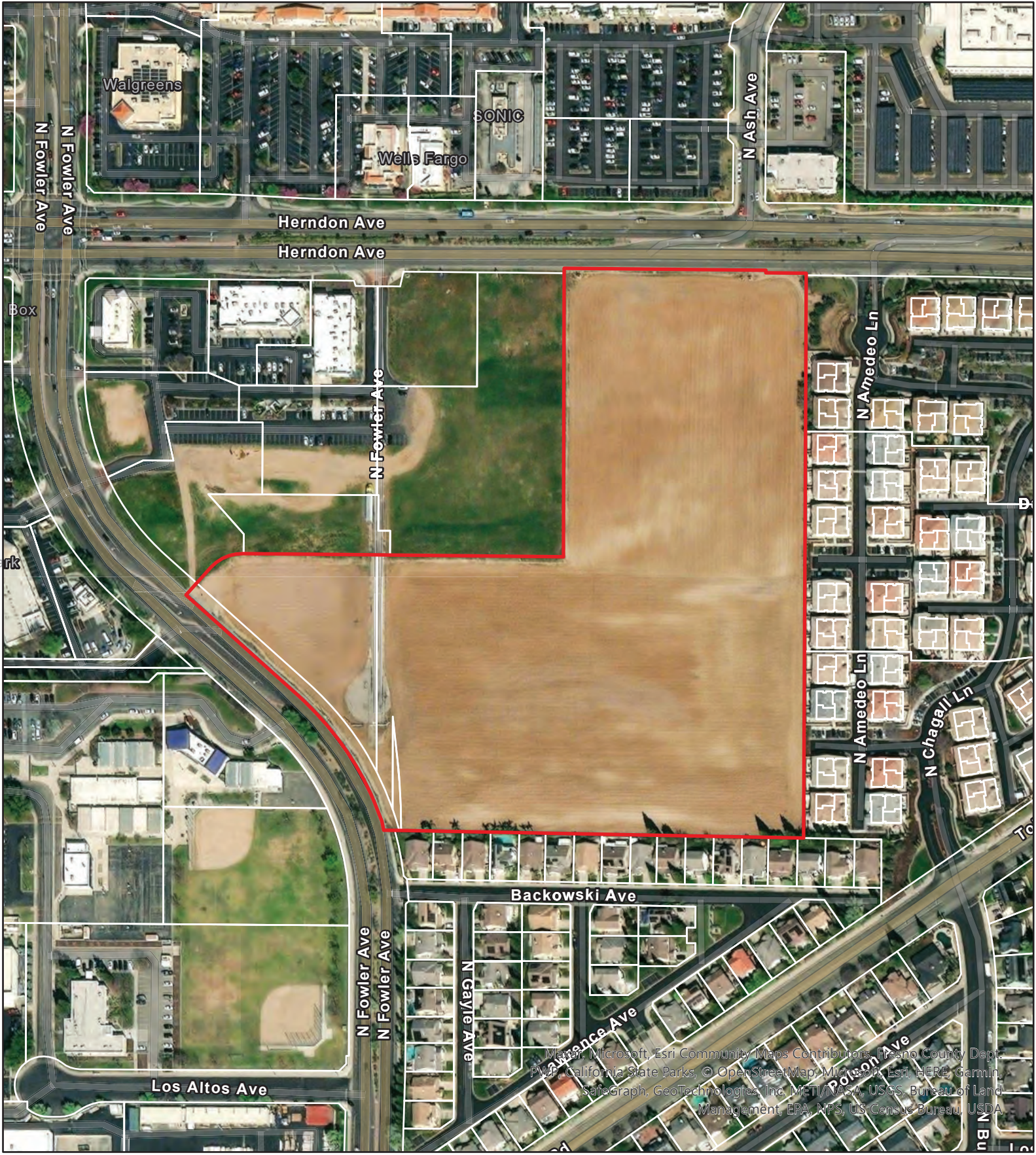
Figure 1

Clovis Unified District Facilities Project
 Clovis Unified School District

- Project Site
- Clovis City Limits
- Clovis Sphere of Influence
- Fresno City Limits
- Fresno Sphere of Influence

N


0 1 2 4
 Miles



Project Site **Figure 2**


Clovis Unified District Facilities Project
 Clovis Unified School District

ODELL Planning & Research, Inc.
 Environmental Planning • School Facility Planning • Demographics

Project Site

Parcels

N



0 100 200 400
Feet

3. Project Description

Phase 1 of Project. Under Phase 1, the Clovis Unified School District (District) proposes to construct and operate a new Special Education Administration building, an Online School building and associated improvements on 16.61 acres located southeast of the intersection of North Fowler and East Herndon Avenues in the City of Clovis, Fresno County, California (APN: 491-050-74ST, 550-020-45T, and 550-020-47T). Construction of Phase 1 will begin in Fall 2023 and is anticipated to be completed and operational by Fall 2024 (see Figure 3 Site Plan).

Special Education Building. The Special Education facility will include a reception/lobby area, administration offices, operations, and school services, meeting, and conference rooms, and break rooms; and will house the Clovis Infant Toddler Intervention (CITI) Kids program. This building will total about 24,167 square feet.

Online School Building. The Online School facility will include administration offices, reception/lobby, classrooms, flex rooms, teacher offices, a computer lab, and Science, Technology, Engineering and Math (STEM) labs, and will total about 27,399 square feet.

Employment. The Special Education facility would employ 55 employees during the week, except for 62 employees on Monday. The Online School facility would employ 50 employees daily throughout the week. Under Phase 1 the total employment will range from 105 to 112. Instructors would be on campus from 8:00 to 3:00 PM.

Students. There will be about 30 students and 30-40 parents in the Special Education facility during the day. Student instruction at the Online School would be about 100 students per day. Students would come and go at different times during the day. Also, about 30-40 student/parent intake sessions would occur daily. Each year, for three weeks, testing for 400-500 students would occur in the online school building. During this testing period, students would come and go throughout the day.

Traffic. The site would be accessed via two points of ingress/egress along N. Fowler and E. Herndon Avenues. One driveway will be located on the south side of Herndon Avenue approximately 965 feet east of Fowler Avenue and is proposed to have right-in right-out access. The second driveway will be located on the east side of Fowler Avenue approximately 675 feet south of Herndon Avenue and is proposed to have right-in, right-out, and left-in access. This project driveway will be aligned with a driveway on the west side of Fowler Avenue (Figure 3). A drop-off space for 5-6 vehicles and a full-size bus and parking for 340 vehicles would be provided.

Future Phase. A future phase would consist of the construction and operation of District administrative offices in several buildings totaling about 90,000 square feet. The timing for the future phase construction is uncertain at this time.

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PARKING ANALYSIS

VEHICLE PARKING:
2019 CBC 11B-208.2, WHERE MORE THAN ONE PARKING FACILITY IS PROVIDED ON A SITE, THE NUMBER OF ACCESSIBLE SPACES SHALL BE CALCULATED FOR EACH PARKING FACILITY.

PARKING	2019 CBC 11B 502.1
STANDARD SPACES	73
ACCESSIBLE SPACES	3 (2 ACCESSIBLE, 1 VAN)
TOTAL PARKING	76
OFFICE AREA/PARKING RATIO	1 PER 8 STUDENTS
2019 CBC 11B 502.1	76
TOTAL PARKING	43
STANDARD SPACES	17
ACCESSIBLE SPACES	1 (1 VAN)
TOTAL PARKING	18
OFFICE AREA/PARKING RATIO	1 SPACE/250 SQ. FT.
2019 CBC 11B 502.1	18
TOTAL PARKING	77
STANDARD SPACES	77
ACCESSIBLE SPACES	4 (3 ACCESSIBLE, 1 VAN)
TOTAL PARKING	81

OVERALL TOTAL PARKING PROVIDED 229
OVERALL TOTAL PARKING REQUIRED 195

BUILDING A - ONLINE SCHOOL (PARKING C AND D)
TOTAL BUILDING AREA: 27,399 SQ. FT.
18 SPACES (6% OF TOTAL PARKING)
CALCULATED OFFICE AREA: 21,296 SQ. FT.
OFFICE AREA/PARKING RATIO: 1 SPACE/250 SQ. FT.
18 SPACES
CALCULATED EDUCATION AREA: 6,103 SQ. FT.
EDUCATION AREA/PARKING RATIO: 1 PER 8 STUDENTS
TOTAL PARKING REQUIRED PER CITY OF CLOVIS ZONING ORDINANCE:
21,296 SQ. FT. / 250 + 6% STALLS
100 STUDENTS / 8 = 13 STALLS
TOTAL = 88 STALLS

BUILDING B - SPECIAL EDUCATION ADMINISTRATION (PARKING A AND B)
TOTAL BUILDING AREA: 24,167 SQ. FT.
OFFICE AREA/PARKING RATIO: 1 SPACE/250 SQ. FT.
TOTAL PARKING REQUIRED (PER CITY OF CLOVIS ZONING ORDINANCE):
24,167 SQ. FT. / 250 + 6% STALLS

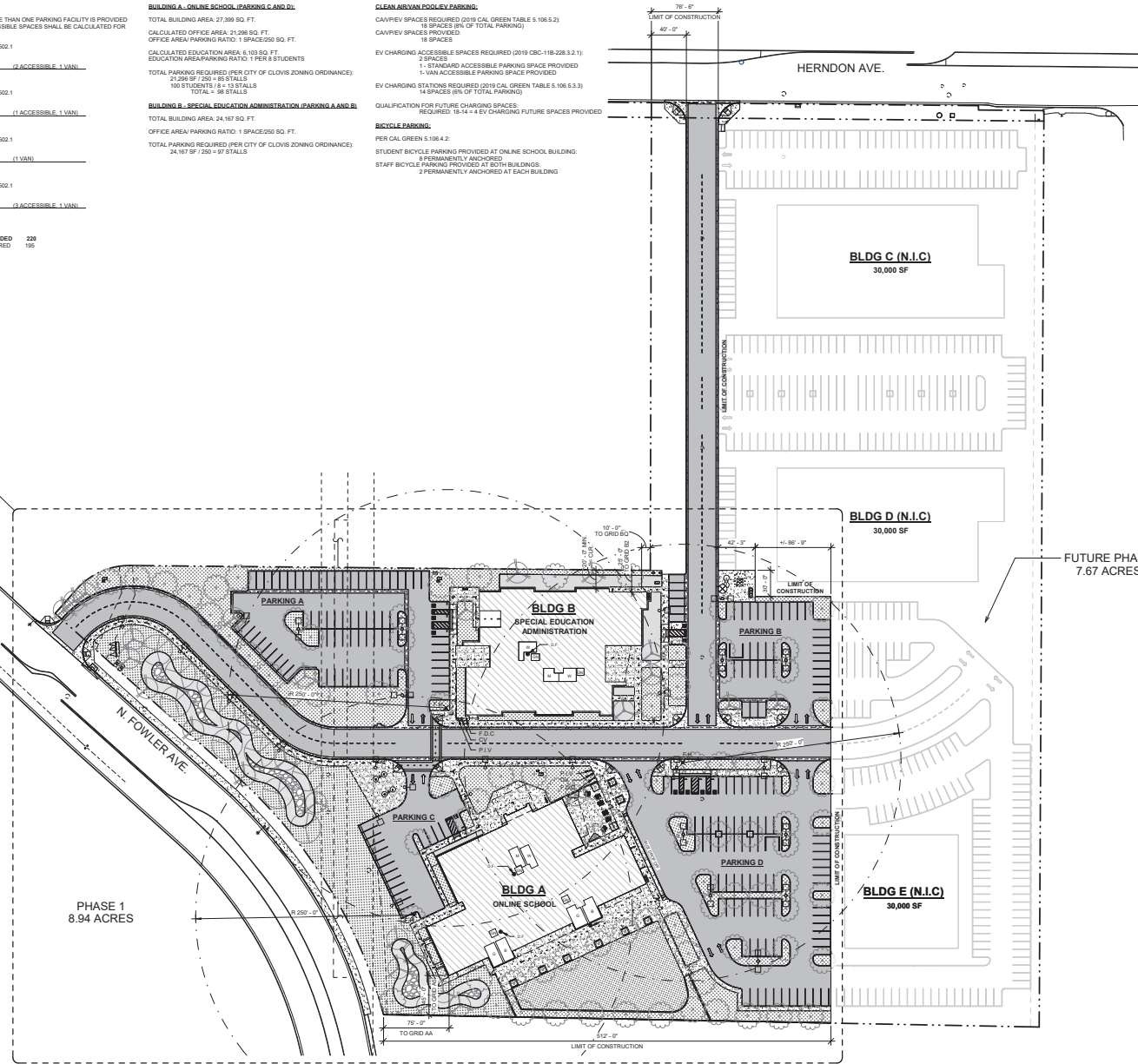
CLEAN AIR/VAN POOL/EV PARKING:
PER CAL GREEN 5.116.4.2
STUDENT BICYCLE PARKING PROVIDED AT ONLINE SCHOOL BUILDING:
8 PERMANENTLY ANCHORED
3 PERMANENTLY ANCHORED
STAFF BICYCLE PARKING PROVIDED AT BOTH BUILDINGS:
2 PERMANENTLY ANCHORED AT EACH BUILDING

EV CHARGING ACCESSIBLE SPACES REQUIRED (2019 CBC-11B-208.3.1):
2 SPACES
1- STANDARD ACCESSIBLE PARKING SPACE PROVIDED
1- VAN ACCESSIBLE PARKING SPACE PROVIDED
EV CHARGING STATIONS REQUIRED (2019 CAL GREEN TABLE 5.106.5.3.3):
14 SPACES (6% OF TOTAL PARKING)
REQUIRE: 18-14 + 4 EV CHARGING FUTURE SPACES PROVIDED

PER CAL GREEN 5.116.4.2
STUDENT BICYCLE PARKING PROVIDED AT ONLINE SCHOOL BUILDING:
8 PERMANENTLY ANCHORED
3 PERMANENTLY ANCHORED
STAFF BICYCLE PARKING PROVIDED AT BOTH BUILDINGS:
2 PERMANENTLY ANCHORED AT EACH BUILDING



DEMO PROPOSED



KEYNOTES

- FUTURE BUILDING NOT INCLUDED IN SCOPE OF WORK
- PROPOSED BUILDINGS IN THIS APPLICATION
- FIRE ACCESS LANE W/ UNOBSTRUCTED WIDTH OF 20'-0" MIN AND AN UNOBSTRUCTED VERTICAL CLEARANCE OF 13'-0" MIN.
- ASPHALT PAVING 150,016 SF - SEE CIVIL DRAWINGS
- LOW WATER USE PLANTER AREAS 78,075 SF. SEE LANDSCAPE DRAWINGS
- MODERATE WATER USE PLANTER AREAS 5,086 SF. SEE LANDSCAPE DRAWINGS
- MODERATE WATER USE - 100% BERBERA GRASS 500 12.66 SF. SEE LANDSCAPE DRAWINGS
- RETENTION BASIN PLANTED AREAS - LOW WATER USE 1,981 SF. SEE LANDSCAPE DRAWINGS
- RETENTION BASIN CORNELL MULCH AREA 2,711 SF. SEE LANDSCAPE DRAWINGS
- CONCRETE PAVING 49,082 SF. SEE CIVIL DRAWINGS. SEE AXI AND XXX FOR CONCRETE FINISH AND LAYOUT INFORMATION
- ACCESSIBLE WOMEN'S/GENDER NEUTRAL RESTROOMS
- ACCESSIBLE DRINKING FOUNTAIN/BOTTLE FILLER
- LANDSCAPE AREA, SEE LANDSCAPE
- LIGHT POLE, SEE ELECTRICAL
- PATHWAY LIGHT BOLLARD, SEE ELECTRICAL
- FIRE HYDRANT, SEE CIVIL
- FIRE DEPARTMENT CONNECTION, SEE CIVIL
- POST INDICATOR VALVE, SEE CIVIL
- ASSUMED PROPERTY LINE
- PROPERTY LINE
- ACCESSIBLE ROUTE (2019 CBC SECTION 11B-209)

LEGEND

THE ACCESSIBLE ROUTE IS A CONTINUOUS UNOBSTRUCTED PATH CONNECTING ACCESSIBLE ELEMENTS AND SPACES OF AN ACCESSIBLE SITE. BUILDING OR FACILITY THAT CAN BE NEGOTIATED BY A PERSON WITH A DISABILITY USING A WHEELCHAIR, AND THAT IS ALSO SAFE FOR AND USABLE BY PERSONS WITH OTHER DISABILITIES. ACCESSIBLE ROUTES SHALL COMPLY WITH CBC 11B-209. IN GENERAL, EXTERIOR ACCESSIBLE ROUTES SHALL COMPLY WITH THE FOLLOWING: SHALL BE STABLE, FIRM, AND SLIP RESISTANT; HAVE A 1/20 MAXIMUM RUNNING SLOPE FOR WALKING SURFACES; SHALL BE FREE OF TRIPS AND CURB RAMP; HAVE A 1/4" TO 1/2" MAXIMUM CROSS SLOPE; HAVE A 48" MINIMUM WIDTH; HAVE NO VERTICAL OFFSETS GREATER THAN 1/4" OFFSETS BETWEEN 1/4" AND 1/2" SHALL BE BEVELLED WITH A SLOPE NOT EXCEEDING 1/2" IN 12" HAVING A MINIMUM RAMP OF 1/2" DIAMETER SPHERE; ELONGATED OPENINGS SHALL BE PERPENDICULAR TO THE DIRECTION OF TRAVEL; HAVE A MINIMUM 4" CLEARANCE GUARDRAIL AT EDGES WHERE THE DROP OFF EXCEEDS 4" EXCEPT WHERE ADJACENT TO VEHICULAR TRAFFIC; HAVE A MINIMUM VERTICAL CLEARANCE PROJECTING MORE THAN 4" FROM WALLS BETWEEN 27" AND 80" ABOVE THE WALKING SURFACE, AND HAVE A MINIMUM VERTICAL CLEARANCE.

DESIGN PROFESSIONAL IN CHARGE STATEMENT (SEE DESIGN PROCEDURE DR-151)

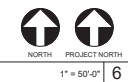
- THE P.O.T. IDENTIFIED IN THESE CONSTRUCTION DOCUMENTS MEETS THE REQUIREMENTS OF THE CURRENT APPLICABLE CALIFORNIA BUILDING CODE (CBC) ACCESSIBILITY PROVISIONS AND/OR OTHER TRAVEL REQUIREMENTS FOR ALTERATIONS, ADDITIONS AND STRUCTURAL REPAIRS.
- ALL PARTS OF THE DESIGN COMPLIANT WITH THE CBC HAVE BEEN EVALUATED AND ANY ELEMENTS, COMPONENTS OR PORTIONS OF THE P.O.T. THAT WERE DEEMED TO BE NONCOMPLIANT WITH THE CBC HAVE BEEN IDENTIFIED AND THE CORRECTIVE WORK NECESSARY TO BRING THEM INTO COMPLIANCE HAS BEEN INCLUDED WITHIN THE SCOPE OF THIS PROJECT'S WORK THROUGH DETAILS, DRAWINGS, AND SPECIFICATIONS INCORPORATED INTO THESE CONSTRUCTION DOCUMENTS.
- ANY NONCOMPLIANT ELEMENTS, COMPONENTS OR PORTIONS OF THE P.O.T. THAT WILL NOT BE CORRECTED BY THIS PROJECT BASED ON VALUATION, THRESHOLD LIMITATIONS OR A FINDING OF UNREASONABLE HARDSHIP ARE INDICATED IN THESE CONSTRUCTION DOCUMENTS.
- DURING CONSTRUCTION, IF P.O.T. ITEMS WITHIN THE SCOPE OF THE PROJECT REPRESENTED AS CBC COMPLIANT ARE FOUND TO BE NONCOMPLYING BEYOND REASONABLE CONSTRUCTION TOLERANCES, THE ITEMS SHALL BE BROUGHT INTO COMPLIANCE WITH THE CBC AS A PART OF THIS PROJECT BY MEANS OF A CONSTRUCTION CHANGE DOCUMENT.

GENERAL NOTES

- A. THE CONTRACTOR SHALL ACCEPT THE SITE IN ITS PRESENT CONDITION & DEMOLISH AND/OR REMOVE FROM THE AREA OF THE PROJECT ALL STRUCTURES, BOTH SURFACE & SUBSURFACE, TREES, BRUSH, ROOTS, DEBRIS, ORGANIC MATTER, & ALL OTHER MATTER DETERMINED BY THE INSPECTOR TO BE DELETERIOUS. SUCH MATERIAL SHALL BE REMOVED FROM THE SITE BY THE CONTRACTOR.
- B. EXCAVATIONS SHALL BE ADEQUATELY SHORED, BRACED & SHEETED SO THAT THE EARTH WILL NOT SLIDE OR SETTLE & SO THAT ALL EXISTING IMPROVEMENTS OF ANY KIND WILL BE FULLY PROTECTED FROM DAMAGE. WHERE THE EXCAVATION FOR A CONDUIT TRENCH, AND/OR STRUCTURE IS FIVE FEET OR MORE IN DEPTH, THE CONTRACTOR SHALL PROVIDE AN APPROPRIATE SHEETING WHICH SHALL CONFORM TO THE APPLICABLE CONSTRUCTION SHEETWORK ORDERS OF THE DIVISION OF INDUSTRIAL SAFETY OF THE STATE OF CALIFORNIA. THE CONTRACTOR SHALL ALWAYS COMPLY WITH OSHA REQUIREMENTS.
- C. FINISH GRADE SHALL HAVE A 1% SLOPE AWAY FROM THE BLDG. FOR A DISTANCE NOT LESS THAN 6" FROM THE BLDG.
- D. EXISTING UNDERGROUND UTILITIES & IMPROVEMENTS ARE SHOWN IN THEIR APPROX. LOCATIONS BASED UPON RECORD INFO. AVAILABLE TO THE ARCHITECT AT THE TIME OF PREPARATION OF THESE PLANS. LOCATIONS MAY NOT HAVE BEEN VERIFIED IN THE FIELD & NO GUARANTEE IS MADE AS TO THE ACCURACY OR COMPLETENESS OF THE RECORD. THE CONTRACTOR SHALL NOTIFY UTILITY COMPANIES AT LEAST 2 WORKING DAYS IN ADVANCE OF CONSTRUCTION TO FIELD LOCATE UTILITIES. CALL UNDERGROUND SERVICE ALERT (U.S.A.) 1-800-642-2444.
- E. ALL SITE CONC. CURBS, GUTTERS, DRIVE APPROACHES & WALKS SHALL BE CLASS 'B' CONC. (8 BAG MAX) WITH A MAX. SLUMP OF 7" & A 3-DAY COMPRESSIVE STRENGTH OF 2000 PSI.
- F. PROPERTY DIMENSIONS AS SHOWN ARE BASED ON RECORD INFO. & SHOULD BE FIELD VERIFIED BY A PROPERTY SURVEY PRIOR TO CONSTRUCTION.
- G. EXTERIOR CONC. LANDINGS AT DOORS SHALL NOT BE MORE THAN 1/2 INCH LOWER THAN DOORWAY THRESHOLD WITH 1/4 INCH PER FOOT SLOPE MAX.
- H. SEE CIVIL FOR A.C. & CONC. PAVING SECTIONS, AND CURB DETAILS. FOR ALL OFF-SITE IMPROVEMENTS (I.E. SIDEWALK ALONG AVENUE) REFER TO CITY OF CLOVIS STANDARD DETAIL. STANDARD COMMERCIAL DRIVE APPROACH PER CITY OF CLOVIS STANDARD DETAILS ___ AND ___.
- I. REFER TO CIVIL, LANDSCAPE, PLUMBING & ELECTRICAL FOR UTILITY INFORMATION. CONTRACTOR TO COORDINATE ALL TRADES TO MAINTAIN PROPER CLEARANCES & AVOID CONFLICTS.

Figure 3: Site Plan

OVERALL SITE PLAN



1" = 50'-0" 6

MARK	DATE	DESCRIPTION
1110022	5/17/22	50% CD SUBMISSION



TETER, LLP
FRESNO HEADQUARTERS | 1001 L STREET, SUITE 200
ARCHITECTS ENGINEERS CONNECTED



ONLINE SCHOOL & SPECIAL EDUCATION ADMINISTRATION DISTRICT OFFICE EXPANSION
CLOVIS UNIFIED SCHOOL DISTRICT
CLOVIS, CA

PROJECT NO. 12242.00
DRAWING G100
OVERALL SITE PLAN

4. Actions Required to Implement Project

The District must undertake the following actions to implement the project:

- Complete the California Environmental Quality Act (CEQA) process for the project by adopting a mitigated negative declaration for the project
- Adopt and implement the Mitigation Monitoring and Reporting Program identified in Section F of this Initial Study
- Approve the project

5. Project Schedule

Phase 1 of the project is scheduled to start construction in September 2023. The timing for future phase construction is uncertain at this time.

6. Project Setting

a. Existing Land Uses

The proposed school site is vacant. Nearby land uses include commercial shopping centers to the north and west and urban residences to the east and south. A bank and small restaurant commercial shopping area are located on the southeast corner of N. Fowler and E. Herndon Avenues and adjacent to the project site.

b. Public Land Use Policies

The City of Clovis General Plan Land Use Element (City of Clovis 2014a) provides land use policy within the proposed project area. The land use designation for the project site is General Commercial). Typical uses include community- or regional-scale centers anchored by large format stores as well as a variety of retail outlets and restaurant and entertainment uses. Hotels and motels are also appropriate.

c. Zoning

The City's current Zoning Districts for the project site are Single-Family Residential Very Low Density (R-A) and Single-Family Low Density (R-1). Zone District R-A identifies areas appropriate for large lot single-family uses. Zone District R-1 identifies areas appropriate for conventional single-family uses. Educational uses are allowed in these residential zone districts per the City of Clovis Development Code.

d. Streets and Highways

N. Fowler and E. Herndon Avenues are the existing streets nearest the project site. N. Fowler Avenue is a north-south four-lane arterial adjacent to the west side of the proposed project site. Herndon Avenue is an east-west six-lane arterial adjacent to the north side of the project site. Controlled access to Highway 168 from N. Fowler Avenue is approximately 0.5 miles north of the project site. Controlled access to Highway 168 from Herndon Ave is about 1.2 miles west of the project side.

e. Public Utilities and Services

The project site is within the City of Clovis (City) and will be served through the City's water and sewer facilities. Existing water and sewer facilities, which serve the commercial shopping areas to the north and west, and urban neighborhoods to the east and south, are located nearby. Pacific Gas & Electric (PG&E) provides electricity and natural gas within the City. The City's Public Utilities Department (PUD provides solid waste collection and sewer collection services.

f. Storm Drainage

Fresno Metropolitan Flood Control District (FMFCD) has responsibility for storm water management and flood control within the City of Clovis. The project site is located in three Master Plan drainage areas,

Drainage Area "5F", Drainage Area "6D" and Drainage Area "7D" and will need to comply with FMFCD requirements for drainage improvements (see Appendix 1).

g. *Climate.*

The climate in the project area is semi-arid, with an annual normal precipitation of approximately 11 inches. Temperatures in the project area range from an average minimum of approximately 38 degrees Fahrenheit (°F) in January, to an average maximum of 98°F, in July (WRCC 2023).

h. *Police and Fire*

The Clovis Police Department and the Clovis Unified School District Police Department will provide law enforcement services and the Clovis Fire Department will provide fire protection services.

i. *Transit*

The Clovis Transit Service, Stageline, provides fixed route services throughout the city. Stageline Route 50 runs west along Herndon Avenue, north of the proposed site. The route turns left at the North Fowler/Herndon intersection and runs south along the west boundary of the project site. The City's Round-Up is a paratransit service for disabled Clovis residents, who cannot use the Stageline. Round Up vehicles are accessible following the Americans with Disabilities Act (ADA standards). Vehicles are scheduled and dispatched according to availability.

7. Request for Preliminary Comment

The District distributed a Request for Preliminary Comment for the proposed project on November 21, 2022, to responsible agencies and other agencies that might have an interest in the project. The Request provided an opportunity for the agencies to comment on the potential environmental effects of the project, including whether an Environmental Impact Report, Mitigated Negative Declaration, or Negative Declaration should be prepared for the project. The District also sent the Request to residents and property owners in the project vicinity. Responses from reviewing agencies have been taken into consideration in the analysis presented in this Initial Study. There were no comments from property owners or residents.

8. Other Public Agencies Whose Approval is Required

Implementation of the proposed project would require approvals from the following public agencies in addition to the District:

**Table 2
Responsible Public Agencies**

Public Agencies	Approval(s)
City of Clovis	Review and approve the location, design, and construction of water, sewer, and street improvements.
Fresno Irrigation District (FID)	Review and approval of all improvement plans which affect FID property/easements and canal/pipeline facilities. CUSD must comply with FID requirements as shown in Initial Study Appendix 2.
Fresno Metropolitan Flood Control District (FMFCD)	Review and approve the location, design, and construction of storm drainage improvements. CUSD must comply with FMFCD requirements as shown in Initial Study Appendix 1
San Joaquin Valley Air Pollution Control District (SJVAPCD)	Compliance with applicable rules and regulations, including but not limited to Regulation VIII and Rule 9510 (Indirect Source Review)

B. Environmental Factors Potentially Affected

Based on the evaluations in Part E, the project would have a less than significant impact on the environmental factors listed in the following table. Those factors that require mitigation to be incorporated into the project to be less than significant are noted with an “X”.

TABLE 3
Environmental Factors Potentially Affected

X	Aesthetics		Agricultural and Forestry Resources	X	Air Quality
X	Biological Resources	X	Cultural Resources		Energy Resources
	Geology and Soils	X	Greenhouse Gas Emissions		Hazards and Hazardous Materials
	Hydrology and Water Quality		Land Use and Planning		Mineral Resources
X	Noise and Groundborne Vibration		Population and Housing		Public Services
	Recreation		Transportation		Tribal Cultural Resources
	Utilities and Service Systems		Wildfire	X	Mandatory Findings of Significance

C. Determination

Based on this Initial Study, I find that the project could have significant effects on the environment, but mitigation measures incorporated in the project by the Clovis Unified School District will avoid the effects or render them less than significant. Therefore, a Mitigated Negative Declaration is recommended for adoption.

Denver Stairs

6/26/2023

Signature

Date

Denver Stairs

Assistant Superintendent

Print Name

Title

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D. Evaluation of Environmental Impacts

1. State CEQA Guidelines Appendix G Environmental Checklist

This Initial Study identifies and analyzes the potential impacts of the proposed project on the environmental resources and conditions listed in Appendix G in the State CEQA Guidelines. The discussion of impacts in this Initial Study lists each potential impact as stated in Appendix G, provides an analysis of the impact, describes each mitigation measure required to avoid the impact or reduce it to an insignificant level, and concludes with a determination of the level of significance of the impact. References to documents that would provide background information on an impact are provided where applicable.

The discussion of each impact in Part E of this Initial Study concludes with a determination that the impact is potentially significant, less than significant with mitigation, less than significant, or does not involve any impact (no impact).

The “potentially significant” determination is applied if there is substantial evidence that an effect may be significant. Under the State CEQA Guidelines, a significant effect, or impact, on the environment means a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance (see Guidelines Section 15382). The District must prepare an Environmental Impact Report for the project if the Initial Study identifies one or more potentially significant impacts that cannot be mitigated to a less than significant level.

The “less than significant impact with mitigation incorporated” determination applies when the incorporation by the District of mitigation measures in the project would reduce an impact from potentially significant to less than significant. This Initial Study describes each mitigation measure the District has incorporated into the project to reduce potentially significant impacts to a less-than-significant level.

The “less than significant” determination applies when the project would not result in a significant effect on a resource or condition. The less-than-significant determination is used only in cases where no mitigation measures are required to reduce an impact to a less-than-significant level.

The “no impact” determination applies when the project would have no impact on a resource or condition, or the resource or condition does not apply to the project or its location.

This Initial Study incorporates by reference all documents and other sources of information cited in the Evaluation of Environmental Impacts (Part E) and Sources Consulted (Part H).

2. Existing Laws, Regulations, Policies, and Mitigation Measures

Introduction: In some cases, an impact that might appear to be significant is less than significant because it is subject to state, regional, or local laws, regulations, or policies, the application of which will reduce the impact to a less than significant level or avoid the impact entirely. In evaluating impacts, this Initial Study considered the applicable laws, regulations, and policies to determine the effect they would have on preventing or reducing potentially significant impacts. The Initial Study, however, does not cite them as mitigation measures because they would apply to the project regardless of the outcome of the Initial Study. For the proposed project, applicable laws, regulations, and policies include but are not limited to the following:

State of California: The state requirements include but are not limited to the following:

- **Education Code Section 17213, Public Resources Code Section 21151.8; and California Code of Regulations, Title 5, Section 14011[h],[i]; Title 14, Section 15093:** Requires District Board to adopt findings stating: (1) the proposed school site is not a current or former waste disposal site; (2) the site is not a hazardous substance release site; (3) the site does not contain pipelines; and (4) whether a qualified freeway and/or qualified traffic corridor is located within 500 feet of the site. In addition, requires board-adopted findings for hazardous air emitters and hazardous material handlers located within a 1/4 mile of the site.
- **Education Code Section 17215 and California Code of Regulations, Title 21, Division 2.5, Chapter 2.1: airports:** Requires providing notice to the State Department of Education if a proposed school site is within two nautical miles, measured by air line, of that point on an airport runway or a potential runway included in an airport master plan that is nearest to the site. The Department of Education is required to consult with the Department of Transportation as to the safety of the site concerning airport operations.
- **Title 5, California Code of Regulations, Article 2, Section 14010, Standards for School Site Selection:** The standards address: possible hazards related to power line easements, railroads, airports, major streets, above-ground pipelines, underground pipelines, above-ground storage tanks, traffic, noise, seismicity, geology, soils, flooding, dam flood inundation, incompatible zoning, and other safety-related factors.
- **Title 24, California Code of Regulations, Part 1 through Part 12:** Specifies the State of California building regulations for public schools. The Division of the State Architect is responsible for administering the regulations.

Central Valley Regional Water Quality Control Board

National Pollutant Discharge Elimination System (NPDES) Permit and Waste Discharge Requirements General Permit for Discharges from Municipal Separate Storm Sewer Systems (MS4) (Order No RS-2016-0040, NPDES No CAS0085324).

Fresno Metropolitan Flood Control District

Fresno Metropolitan Flood Control District Storm Drainage and Flood Control Master Plan.

<http://fmfcd.maps.arcgis.com/apps/webappviewer/index.html?id=5ac65186b1794949a1fda62ca7734986>

San Joaquin Valley Air Pollution Control District

Regulation VIII – Fugitive PM10 Prohibitions and Regulation IX – Mobile and Indirect Sources

(<https://www.valleyair.org/rules/1ruleslist.htm>)

City of Clovis

- City of Clovis General Plan
- City of Clovis Municipal Code

E. Environmental Checklist

The questions in Sections E, 1-20 are taken from the State CEQA Guidelines, Appendix G: Environmental Checklist Form, Evaluation of Environmental Impacts. The thresholds of significance used for this Initial Study are the same as the environmental issues listed in the Appendix G Checklist.

1. Aesthetics

Except as provided in Public Resources Code § 21099, would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Have a substantial adverse effect on a scenic vista?			X	
b. Substantially damage scenic resources, including, but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway?				X
c. In nonurbanized 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?			X	
d. Create a new source of light and glare that would adversely affect day or nighttime views in the area?		X		

Except as provided in Public Resources Code Section 21099, would the project:

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

Less than Significant Impact

The terrain of the project site is level and adjacent to commercial shopping centers to the north and west and urban subdivisions to the east and south. Distant views of the Sierra Nevada Mountains to the east and northeast are sometimes visible but frequently obscured due to poor air quality or atmospheric conditions. The Clovis General Plan (City of Clovis 2014a) and the Development Code Update Master Environmental Impact Report (City of Clovis 2014b) did not identify or designate any scenic vistas within or near the project area. The proposed project will not have a substantial adverse effect on a scenic vista. The impact is less than significant.

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

No Impact

As stated in the Clovis General Plan Environmental Impact Report (EIR), there are no Caltrans-designated scenic highways within the City of Clovis. Further, there are no existing historical structures or rock outcroppings located on or within the immediate vicinity of the site. There would be no impact.

- 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?**

Less than Significant Impact

The existing site is near commercial shopping areas to the north and west and an urbanized area surrounded by residential development to the east and south. The surrounding area is generally characterized by different types of structures of varying heights, designs, and character. The District proposes an architectural aesthetic that will 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. Further, as mentioned above, there are no officially designated scenic areas in the City and none specifically at or surrounding the site itself. The impact is less than significant.

- d. **Create a new source of light and glare that would adversely affect day or nighttime views in the area?**

Less Than Significant Impact with Mitigation Incorporated

The proposed project will increase light and glare in its vicinity. Project buildings and parking areas will be lit in the evenings for the safety and security of the students and staff. Headlights from vehicles arriving and departing the school during evening hours would be the only potential source of glare from the project. The project lighting would not be unusual within the existing urban environment surrounding the site. However, to ensure that adjacent existing and future land uses are not significantly impacted, the following mitigation measures will be incorporated into the project.

Mitigation Measure AE-1: All parking area lighting shall have full cut-off type fixtures. A full cut-off type fixture is a luminaire or lighting fixture that, by the design of the housing, does not allow any light dispersion or direct glare to shine above a 90-degree horizontal plane from the base of the fixture. Full cut-off type fixtures must be installed in a horizontal position as designed.

Mitigation Measure AE-2: All external signs and lighting shall be lit from the top and shine downward except where uplighting is required for safety or security purposes. The lighting shall also be, as much as physically possible, contained to the target area.

Mitigation Measure AE-3: Exterior building lighting for security or aesthetics shall be a full cut-off or a shielded type design to minimize any upward distribution of light.

Mitigation Measure AE-4: Non-essential lighting shall be turned off by 10:00 pm.

Level of Significance after Mitigation: With implementation of Mitigation Measures AE-1 through AE-4 this impact would be less than significant.

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2. Agriculture and Forestry Resources

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non- agricultural use?			X	
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?				X
c. Conflict with existing zoning for, or cause rezoning of, forestland, timberland, or timberland zoned Timberland Production?				X
d. Result in the loss of forestland or conversion of forestland to non-forest use?				X
e. Involve other changes in the existing environment which, due to their location or nature, could result in the conversion of Farmland, to non-agricultural use or conversion of forestland to non-forest use?				X

Would the project:

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

Less than Significant Impact

The project area is classified as Farmland of Local Importance according to the Farmland Mapping and Monitoring Program of the State Department of Conservation (California Department of Conservation 2022). The project area is not located on land that is designated as Prime Farmland or Farmland of State Importance. Therefore, implementation of the proposed project would not result in the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance.

However, the project area is classified as Farmland of Local Importance. Farmland of Local Importance is important to the local agricultural economy as determined by each county’s board of supervisors and a local advisory committee. In Fresno County, this means all farmable lands that do not meet the definitions of Prime, Statewide, or Unique are Farmland of Local Importance. This includes land that is or has been used for irrigated pasture, dryland farming, confined livestock and dairy, poultry facilities, aquaculture, and grazing land.

The project area is within the city limits of Clovis and has not been used for agricultural purposes for approximately 15 years. It is not classified or considered long-term strategic farmland and is surrounded by commercial shopping centers and urban residences. As stated in Section 7.a and b, the land use designation for the project site is G-C and zoned as RA and R-1. The impact is less than significant.

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

No Impact

The proposed site is not enrolled in a Williamson act contract. There is no impact.

c. Conflict with existing zoning for, or cause rezoning of, forestland, timberland, or timberland zoned timberland production?

No Impact

The project site is not in an area where these resources exist and is not zoned for timberland production. The proposed project would not affect forestland, timberland, or is it on timberland zoned for timberland production. There is no impact.

d. Result in the loss of forestland or conversion of forestland to non-forest use?

No Impact

Forestland resources are not present on the project site. Thus, there would be no conversion of forestland to non-forest use. The site is not in an area where these resources exist. There is no impact.

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 forestland to non-forest use?

No Impact

The site is located in an area surrounded by residential and commercial use. The proposed project would not convert farmland to non-agriculture use or convert forestland to non-forest use. There is no impact.

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3. Air Quality

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

Background

An Air Quality and Greenhouse Gas Impact Analysis was prepared by Ambient Air Quality & Noise Consulting for this proposed project and is included as Appendix A to this Initial Study. This Initial Study uses information from the analysis to evaluate the proposed project impacts.

In summary, the project is located within the San Joaquin Valley Air Basin (SJVAB) The SJVAB is within the jurisdiction of the San Joaquin Valley Air Pollution Control District (SJVAPCD). Air quality in the SJVAB is influenced by a variety of factors, including topography, and local and regional meteorology.

The climate is semi-arid, with an annual normal precipitation of approximately 11 inches. Temperatures in the project area range from an average minimum of approximately 38°F, in January, to an average maximum of 98°F, in July (WRCC 2023).

Air Pollutants of Concern

For the protection of public health and welfare, the federal Clean Air Act (CAA) required that the Environmental Protection Agency (EPA) establish National Ambient Air Quality Standards (NAAQS for various pollutants. These pollutants are referred to as "criteria" pollutants because the EPA publishes criteria documents to justify the choice of standards. The following provides a summary discussion of the primary and secondary criteria for air pollutants of primary concern.

Ozone (O₃) is a reactive gas consisting of three atoms of oxygen. In the troposphere, it is a product of the photochemical process involving the sun's energy. It is a secondary pollutant that is formed when Nitrous Oxides (NO_x) and volatile organic compounds (VOC) react in the presence of sunlight. Ozone at the earth's surface causes numerous adverse health effects and is a criteria pollutant. It is a major component of smog. In the stratosphere, ozone exists naturally and shields Earth from harmful incoming ultraviolet radiation. High concentrations of ground-level ozone can adversely affect the human respiratory system and aggravate cardiovascular disease and many respiratory ailments. Ozone also damages natural ecosystems such as forests and foothill communities, crops, and some man-made materials, such as rubber, paint, and plastics.

Reactive Organic Gas (ROG) is a reactive chemical gas, composed of hydrocarbon compounds that may contribute to the formation of smog by their involvement in atmospheric chemical reactions. No separate health standards exist for ROG as a group. Because some compounds that make up ROG are also toxic, like the carcinogen benzene, they are often evaluated as part of a toxic risk assessment.

Volatile Organic Compounds (VOC) are hydrocarbon compounds that exist in the ambient air. VOCs contribute to the formation of smog and may also be toxic. VOC emissions are a major precursor to the formation of ozone. VOCs often have an odor, and some examples include gasoline, alcohol, and the solvents used in paints.

Total Organic Gases (TOGs) include all of the ROGs, in addition to low-reactivity organic compounds like methane and acetone. ROGs and VOC are subsets of TOG.

Oxides of Nitrogen (NO_x) are a family of gaseous nitrogen compounds and are a precursor to the formation of ozone and particulate matter. The major component of NO_x, nitrogen dioxide (NO₂), is a reddish-brown gas that is toxic at high concentrations. NO_x results primarily from the combustion of fossil fuels under high temperatures and pressure. On-road and off-road motor vehicles and fuel combustion are the major sources of this air pollutant.

Particulate Matter (PM), also known as particle pollution, is a complex mixture of extremely small particles and liquid droplets. The EPA groups particle pollution into three categories based on their size and where they are deposited:

- Inhalable coarse particles or Particulate Matter (PM) (PM_{2.5}- PM₁₀)," such as those found near roadways and dusty industries, are between 2.5 and 10 micrometers in diameter. PM_{2.5-10} is deposited in the thoracic region of the lungs.
- "Fine particles (PM_{2.5})," such as those found in smoke and haze, are 2.5 micrometers in diameter and smaller. These particles can be directly emitted from sources such as forest fires, or they can form when gases emitted from power plants, industries, and automobiles react in the air. They penetrate deeply into the thoracic and alveolar regions of the lungs.
- "Ultrafine particles (UFP)," are very small particles less than 0.1 micrometers in diameter largely resulting from the combustion of fossil fuels, meat, wood, and other hydrocarbons. While UFP mass is a small portion of PM_{2.5}, its high surface area, deep lung penetration, and transfer into the bloodstream can result in disproportionate health impacts relative to their mass.

Carbon Monoxide (CO) is an odorless, colorless gas that is highly toxic. It is formed by the incomplete combustion of fuels and is emitted directly into the air (unlike ozone). The main source of CO is on-road motor vehicles.

Sulfur Dioxide (SO₂) is a colorless, irritating gas with a "rotten egg" smell formed primarily by the combustion of sulfur-containing fossil fuels.

Lead (Pb) is a metal that is a natural constituent of air, water, and the biosphere. Lead is neither created nor destroyed in the environment, so it essentially persists forever. The health effects of lead poisoning include loss of appetite, weakness, apathy, and miscarriage. Engines were a major source of airborne lead through the use of leaded fuels which has mostly phased out, with the result that ambient concentrations of lead have dropped dramatically.

Hydrogen Sulfide (H₂S) is associated with geothermal activity, oil and gas production, refining, sewage treatment plants, and confined animal feeding operations. Hydrogen sulfide is extremely hazardous in high concentrations; especially in enclosed spaces (800 ppm can cause death). OSHA regulates workplace exposure to H₂S.

Would the project:

a. Conflict with or obstruct implementation of the applicable air quality plan?

Less than Significant Impact

Following the SJVAPCD-recommended methodology for the assessment of air quality impacts, projects that result in significant air quality impacts at the project level are also considered to have a significant cumulative air quality impact. As noted in Impact AQ-B, short-term construction, and long-term operational emissions would not exceed applicable thresholds. In addition, the proposed project would not result in a significant increase in vehicle miles traveled (VMT) and would not be inconsistent with the Fresno Council of Government's (FCOG's) *2022 Regional Transportation Plan and Sustainable Communities Strategies* (2022 RTP/SCS). For these reasons, implementation of the proposed project would not be anticipated to conflict with air quality attainment or maintenance planning efforts. This impact would be considered less than significant.

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

Less than Significant Impact

The proposed project is located in the City of Clovis, which is within the SJVAB. The SJVAB is designated nonattainment for the national 8-hour ozone and PM_{2.5} standards. On September 25, 2008, the U.S. EPA redesignated the San Joaquin Valley to attainment for the PM₁₀ NAAQS and approved the PM₁₀ Maintenance Plan (SJVAPCD 2019). Potential air quality impacts associated with the proposed project could potentially occur during project construction or operational phases. Short-term construction and long-term air quality impacts associated with the proposed project are discussed, as follows:

Short Term Construction Emissions

Short-term increases in emissions would occur during the construction process. Construction-generated emissions are of temporary duration, lasting only as long as construction activities occur, but have the potential to represent a significant air quality impact. The construction of the proposed project would result in the temporary generation of emissions associated with site grading and excavation, paving, motor vehicle exhaust associated with construction equipment, and worker trips; as well as the movement of construction equipment on unpaved surfaces. Short-term construction emissions would result in increased emissions of ozone-precursor pollutants (i.e., ROG and NO_x) and emissions of PM. Emissions of ozone-precursors would result from the operation of on-road and off-road motorized vehicles and equipment. Emissions of airborne PM are largely dependent on the amount of ground disturbance associated with site grading and excavation activities and can result in increased concentrations of PM that can adversely affect nearby sensitive land uses. Estimated construction-generated annual emissions associated with the proposed project are summarized in Table 5 in Appendix A.

Construction of the proposed project would generate maximum uncontrolled annual emissions of approximately 0.28 tons/year of ROG, 1.7 tons/year of NO_x, 1.95 tons/year of CO, <0.01 tons/year of SO₂, 0.13 tons/year of PM₁₀, and 0.09 tons/year of PM_{2.5}. Estimated construction-generated emissions would not exceed the SJVAPCD's significance thresholds of 10 tons/year of ROG, 10 tons/year of NO_x, 100 tons/year of CO, 27 tons/year of SO₂, or 15 tons/year for PM₁₀ & PM_{2.5}.

Estimated average-daily on-site construction emissions are summarized in Table 6 of Appendix A. As noted in Table 6, construction of the proposed project would generate maximum on-site emissions of approximately 28.23 lbs/day of ROG, 95.2 lbs/day of NO_x, 84.8 lbs/day of CO, 0.14 lbs/day of SO₂, 33.01 lbs/day of PM₁₀, and 17.53 lbs/day of PM_{2.5}. Daily on-site construction emissions would not exceed the SJVAPCD's recommended localized ambient air quality significance thresholds of 100 lbs/day for any of the criteria pollutants. Additionally, project construction would be required to comply with applicable SJVAPCD rules and regulations. This would further reduce construction-related emissions. For these reasons, the impact of construction-generated emissions would be considered less than significant.

Long Term Operational Emissions

Estimated annual operational emissions for the proposed project are summarized in Table 7 in Appendix A. As depicted, the proposed project upon completion of Phase 1 would result in total operational emissions of approximately 0.67 tons/year of ROG, 0.47 tons/year of NO_x, 2.76 tons/year of CO, 0.01 tons/year of SO₂, 0.21 tons/year of PM₁₀, & 0.05 tons/year of PM_{2.5}. Project-generated emissions would be largely associated with mobile emissions, building operations, including energy use and area sources, such as the occasional use of cleaning products and architectural coating, and maintenance activities. Operational emissions would not exceed SJVAPCD's mass-emissions significance thresholds during Phase 1 operation in 2026.

Also depicted in Table 7, are the complete project upon completion of Phase 1 and Phase 2 in the year 2028 would result in total operational emissions of approximately 1.59 tons/year of ROG, 1.21 tons/year of NO_x, 6.13 tons/year of CO, 0.02 tons/year of SO₂, 0.5 tons/year of PM₁₀, & 0.13 tons/year of PM_{2.5}. Operational emissions would continue to not exceed SJVAPCD's mass-emissions significance thresholds during full operation in 2028.

Estimated average-daily on-site operational emissions are also summarized in Table 7 in Appendix A. As noted above, maximum daily on-site operational emissions would be largely associated with area sources (e.g., landscape maintenance activities and use of consumer products). Maximum daily on-site emissions upon completion of Phase 1 in 2026 would total approximately 1.59 lbs/day of ROG, 0.61 lbs/day of NO_x, 5.98 lbs/day of CO, <0.01 lbs/day of SO₂, 0.05 lbs/day of PM₁₀ and 0.05 lbs/day of PM_{2.5}. Maximum daily on-site emissions upon completion of Phase 2 in 2028 would total approximately 4.4 lbs/day of ROG, 2.57 lbs/day of NO_x, 8.27 lbs/day of CO, 0.02 lbs/day of SO₂, 0.21 lbs/day of PM₁₀ and 0.21 lbs/day of PM_{2.5}.

Maximum daily on-site emissions would not exceed the SJVAPCD's recommended localized ambient air quality significance thresholds of 100 lbs/day for each of the criteria air pollutants evaluated. The long-term operation of the proposed project would not result in a significant impact on regional or local air quality conditions. Additionally, project operation would be required to comply with the 2022 Building Energy Efficiency Standards which include requirements to install onsite solar photovoltaic (PV) systems and an energy storage system (ESS). This would further reduce operational-related emissions. This impact is considered less than significant.

c. **Expose sensitive receptors to substantial pollutant concentrations?**

Less than Significant Impact with Mitigation Incorporated

Sensitive land uses located in the vicinity of the proposed project site consist predominantly of residential land uses. The nearest residential land uses are generally located adjacent to the southern and eastern boundaries of the project site. Long-term operational and short-term construction activities and emission sources that could adversely impact these nearest sensitive receptors are discussed, as follows:

Long-Term Operation

Toxic Air Contaminants

Implementation of the proposed project would not result in the long-term operation of any major onsite stationary sources of TACs, nor would project implementation result in a significant increase in diesel-fueled vehicles traveling along area roadways. No major stationary sources of TACs were identified in the project vicinity that would result in increased exposure of students and employees to TACs. For these reasons, long-term increases in exposure to TACs would be considered less than significant.

Carbon Monoxide

CO is the primary criteria air pollutant of local concern associated with the proposed project. Under specific meteorological and operational conditions, such as areas of heavily congested vehicle traffic, CO concentrations may reach unhealthy levels. If inhaled, CO can be adsorbed easily by the bloodstream and inhibit oxygen delivery to the body, which can cause significant health effects ranging from slight headaches to death. The most serious effects are felt by individuals susceptible to oxygen deficiencies, including people with anemia and those suffering from chronic lung or heart disease.

Mobile-source emissions of CO are a direct function of traffic volume, speed, and delay. The transport of CO is extremely limited because it disperses rapidly with distance from the source under normal meteorological conditions. For this reason, modeling of mobile-source CO concentrations is typically recommended for sensitive land uses located near signalized roadway intersections that are projected to operate at unacceptable levels of service (LOS). Localized CO concentrations associated with the proposed project would be considered less-than-significant if: (1) traffic generated by the proposed project would not result in deterioration of a signalized intersection to LOS E or LOS F; or (2) the project would not contribute additional traffic to a signalized intersection that already operates at LOS E or LOS F.

Under future conditions, the intersection of the project is not anticipated to exceed its level of service (LOS) threshold for any signalized intersection. The traffic report determined that the intersection operation near the project is not significant (see Appendix F Traffic Impact Analysis). For these reasons, long-term exposure to localized pollutant concentrations would be considered less than significant.

Short-Term Construction

Naturally Occurring Asbestos

Naturally-occurring asbestos, which was identified by ARB as a TAC in 1986, is located in many parts of California and is commonly associated with ultramafic rock. The project site is not located near any areas that are likely to contain ultramafic rock (DOC 2000). As a result, the risk of exposure to naturally-occurring asbestos during the construction process would be considered less than significant.

Asbestos-Containing Materials

Demolition activities can have potential negative air quality impacts, including issues surrounding proper handling, demolition, and disposal of asbestos-containing material (ACM). Asbestos-containing materials could be encountered during the demolition of existing buildings, particularly older structures constructed before 1970. Asbestos can also be found in various building products, including (but not limited to) utility pipes/pipelines (transite pipes or insulation on pipes). If a project involves the disturbance or potential disturbance of ACM, various regulatory requirements may apply, including the requirements stipulated in the National Emission Standard for Hazardous Air Pollutants (40CFR61, Subpart M-Asbestos NESHAP). These requirements include but are not limited to 1) notification, within at least 10 business days of activities commencing, to the APCD, 2) an asbestos survey conducted by a Certified Asbestos Consultant, and, 3) applicable removal and disposal requirements of identified ACM.

Lead-Coated Materials

Demolition of structures coated with lead-based paint can have potential negative air quality impacts and may adversely affect the health of nearby individuals. Lead-based paints could be encountered during the demolition of existing buildings, particularly older structures constructed before 1978. Improper demolition can result in the release of lead-containing particles from the site. Sandblasting or removal of paint by heating with a heat gun can result in significant emissions of lead. In such instances, proper abatement of lead before the demolition of these structures must be performed to prevent the release of lead from the site. Federal and State lead regulations, including the Lead in Construction Standard (29CFR1926.62) and California Code of Regulations (CCR Title 8, Section 1532.1, Lead) regulate the disturbance of lead-containing materials during construction, demolition, and maintenance-related activities. Depending on the removal method, a SJVAPCD permit may be required.

The proposed project does not include the demolition of structures. As a result, exposure to lead-based paint would be considered less than significant.

Localized PM Concentrations

Fugitive dust emissions would be primarily associated with site preparation, grading, and vehicle travel on unpaved and paved surfaces. Uncontrolled emissions of fugitive dust may also contribute to potential increases in nuisance impacts to nearby receptors. On-site off-road equipment and trucks would also result in short-term emissions of diesel-exhaust PM (DPM), which could contribute to elevated localized concentration at nearby receptors. Localized concentrations of DPM would be short-term occurring over an approximately three-year period and would constitute less than five percent of the exposure period upon which health-related risks are typically calculated (i.e., 70 years). For this reason, short-term increases in DPM would not be anticipated to exceed SJVAPCD significance thresholds. However, short-term emissions of DPM could contribute to localized increases of particulate matter that may result in short-term nuisance impacts to nearby sensitive receptors. Short-term exposure to airborne particulates can result in irritation of the eyes and the respiratory system and may affect sensitive individuals, including those suffering from asthma and other medical conditions. As a result, exposure to localized PM concentrations would be considered to have a potentially significant impact.

Mitigation Measure AQ-1: The following measures shall be implemented to reduce the potential exposure of nearby sensitive receptors to localized PM concentrations associated with project construction:

- a. Fleet owners of mobile construction equipment are subject to the ARB Regulation for In-Use Off-Road Diesel Vehicles (Title 13, California Code of Regulations (CCR), §2449), the purpose of which is to reduce NO_x, DPM, and other criteria pollutant emissions from in-use off-road diesel-fueled vehicles. Off-road heavy-duty trucks shall comply with the State Off-Road Regulation.
- b. Fleet owners of mobile construction equipment are subject to the ARB Regulation for In-Use (On-Road) Heavy-Duty Diesel-Fueled Vehicles (Title 13, CCR, §2025), the purpose of which is to reduce DPM, NO_x, and other criteria pollutants from in-use (on-road) diesel-fueled vehicles. On-road heavy-duty trucks shall comply with the State On-Road Regulations.
- c. All commercial off-road and on-road diesel vehicles are subject, respectively, to Title 13, CCR, §2449(d)(3) and §2485, limiting engine idling time. Idling of heavy-duty diesel construction equipment and trucks during loading and unloading shall be limited to five minutes; electric auxiliary power units should be used whenever locally available.
- d. Diesel equipment meeting the ARB Tier 3 or higher emission standards for off-road heavy-duty diesel engines shall be used to the extent locally available.
- e. On-road heavy-duty equipment with the model year 2010 engines or newer shall be used to the extent locally available.
- f. Diesel-powered equipment shall be replaced by electric equipment whenever available.
- g. Equipment/vehicles using alternative fuels, such as compressed natural gas (CNG), liquefied natural gas (LNG), propane, or biodiesel, shall be used on-site where locally available.
- h. Catalytic converters shall be installed on gasoline-powered equipment, if available, following the manufacturer's recommendations.
- i. All construction equipment shall be maintained in tune according to the manufacturer's specifications.
- j. The engine size of construction equipment shall be the minimum practical size.
- k. The number of construction equipment operating simultaneously shall be minimized through efficient management practices to ensure that the smallest practical number is operating at any one time.
- l. The proposed project shall comply with SJVAPCD Regulation VIII for the control of fugitive dust emissions. Regulation VIII can be obtained on the SJVAPCD's website at the URL: <https://www.valleyair.org/rules/1ruleslist.htm>. At a minimum, the following measures shall be implemented:
 1. All disturbed areas, including storage piles, which are not being actively utilized for construction purposes, shall be effectively stabilized of dust emissions using water, chemical stabilizer/suppressant, and covered with a tarp or other suitable cover or vegetative ground cover.
 2. All on-site unpaved roads and off-site unpaved access roads shall be effectively stabilized of dust emissions using water or chemical stabilizer/suppressant.
 3. All land clearing, grubbing, scraping, excavation, land leveling, grading, cut & fill, and demolition activities shall be effectively controlled of fugitive dust emissions utilizing the application of water or by presoaking.
 4. When materials are transported off-site, all material shall be covered or effectively wetted to limit visible dust emissions, and at least six inches of freeboard space from the top of the container shall be maintained.
 5. All operations shall limit or expeditiously remove the accumulation of mud or dirt from adjacent public streets at the end of each workday. (The use of dry rotary brushes is expressly prohibited

except where preceded or accompanied by sufficient wetting to limit the visible dust emissions.)
(Use of blower devices is expressly forbidden.)

6. Following the addition of materials to, or the removal of materials from, the surface of outdoor storage piles, said piles shall be effectively stabilized of fugitive dust emissions utilizing sufficient water or chemical stabilizer/suppressant.
7. On-road vehicle speeds on unpaved surfaces of the project site shall be limited to 15 mph.
8. Sandbags or other erosion control measures shall be installed sufficiently to prevent silt runoff to public roadways from sites with a slope greater than one percent.
9. Excavation and grading activities shall be suspended when winds exceed 20 mph (Regardless of wind speed, an owner/operator must comply with Regulation VIII's 20 percent opacity limitation).

Significance After Mitigation

Implementation of Mitigation Measure AQ-1 would include measures to reduce construction-generated emissions that could contribute to increases in localized pollutant concentrations at nearby sensitive receptors. These measures include SJVAPCD-recommended measures, which would help to ensure compliance with applicable SJVAPCD rules and regulations. With mitigation, this impact would be considered less than significant.

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

Less than Significant Impact

Other emissions potentially associated with the proposed project would be predominantly associated with the generation of odors during project construction. The occurrence and severity of odor impacts depend on numerous factors, including the nature, frequency, and intensity of the source; wind speed and direction; and the sensitivity of the receptors. While offensive odors rarely cause any physical harm, they still can be very unpleasant, leading to considerable distress among the public and often generating citizen complaints to local governments and regulatory agencies.

Construction of the proposed project would involve the use of a variety of gasoline or diesel-powered equipment that would emit exhaust fumes. Exhaust fumes, particularly diesel-exhaust, may be considered objectionable by some people. In addition, pavement coatings and architectural coatings used during project construction would also emit temporary odors. However, construction-generated emissions would occur intermittently throughout the workday and would dissipate rapidly within increasing distance from the source. As a result, short-term construction activities would not expose a substantial number of people to frequent odorous emissions. In addition, no major sources of odors have been identified in the project area. This impact would be considered less than significant.

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4. Biological Resources

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

A Biological Resource Evaluation (BRE) was prepared for this Project by Odell Planning & Research and is included as Appendix B to this Initial Study. This Initial Study incorporates information and analysis from this report to evaluate impacts on biological resources.

Would the project:

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

Less Than Significant Impact

The BRE identified 38 animal and 15 plant species with special species status¹ that have occurred within a 9-topographic quadrangle search area as defined by the California Natural Diversity Database. Due to the

¹ Special species status includes species that are considered endangered, threatened, candidate, or sensitive by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service. Special status species also include raptors because they are protected by the federal Migratory Bird Treaty Act and Bald and Golden Eagle Protection Act.

urbanization of the surrounding area and loss of habitat, these species are extirpated from the project site or within the vicinity. Raptors such as Cooper's hawk and red-tailed hawk have been observed nearby. These species may forage for small mammals, such as the California ground squirrel. Some ground squirrel burrows scattered on the site could provide suitable nesting habitat for burrowing owls but the high level of urbanized activity e.g., noise, traffic, and the lack of local occurrences make the presence of the burrowing owl unlikely. No valley elderberry shrubs were observed on the project site; thus, the valley elderberry longhorn beetle is not present. And due to the highly disturbed habitat of the project site, the northern California legless lizard, blunt-nosed leopard lizard, and giant garter snake and the lack of local presence make the presence of these species unlikely. The western pond turtle requires aquatic habitats such as marshes, streams, or ponds. The features are not present on the project site. Therefore, the project would have no impact on special-status wildlife species.

Fourteen (14) migratory bird species are historically known or have the potential to occur within the nine topographic map quadrangles surrounding the proposed project site (bald eagle, Belding's savannah sparrow, Bullock's oriole, western grebe, common yellowthroat, golden eagle, Lawrence goldfinch, Nuttall's woodpecker, oak titmouse, olive-sided flycatcher, short-billed dowitcher, tricolored blackbird, western grebe, and yellow-billed magpie). These species are federally or state-protected species however, no migratory birds or raptor nests were present onsite. Ornamental trees and shrubs along the eastern and southern boundaries within adjacent residences areas could provide nesting habitat. However, urban activities such as noise, traffic, and domestic pets, make the presence of migratory birds unlikely. During the site visit, a flock of Canadian geese, a migratory species, was observed flying overhead. Canada geese are extremely adept at living in human-altered areas and have established breeding colonies in urban areas near the site. Other bird species observed in the vicinity of the project site include domestic pigeons, crows, and mockingbirds. No wetland or riparian habitat exists on-site that would support nesting or foraging of the tricolored blackbird or least Bell's vireo.

Due to the lack of suitable habitat, the proposed project would not affect special-status wildlife species although the incidental presence of migratory birds cannot be completely ruled out. The impact is less than significant.

Of the 15 potentially occurring special status plant species, none were found within the project area. Although the site survey was not conducted at the peak blooming period for some potentially occurring special status plants, these plant species could be ruled out because their elevation range, required habitat, and/or soil type differs from the project site's conditions. Therefore, the project would not impact any special-status plant species. The impact is less than significant.

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

No Impact

There are no aquatic resources, marshes, ponds, wetlands, riparian habitat, or sensitive natural communities within the project area. There is no impact.

- 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?**

No Impact

There are no federally protected wetlands, marshes, or vernal pools present. There is no impact.

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

Less than Significant with Mitigation

The site does not constitute a movement corridor for native wildlife. The project site is bordered by commercial shopping, residential development, and busy streets, which restricts access to wildlife. Smaller wildlife species and birds are not expected to be further inhibited by the project. However, the incidental presence of prey species and predators such as raptors or coyotes cannot be completely ruled out. To ensure that wildlife movement or use during the construction of the project would not be significantly affected, the following mitigation measures will be incorporated into the project.

Mitigation Measure BR-1: Some wildlife species are attracted to den-like structures such as pipes and may enter stored pipes, becoming trapped or injured. All construction pipes, culverts, or similar structures with a diameter of 4 inches or greater that are stored at a construction site for one or more overnight periods should be thoroughly inspected for wildlife before the pipe is subsequently buried, capped, or otherwise used or moved in any way.

Mitigation Measure BR-2: To prevent inadvertent entrapment of wildlife while work is being conducted, the contractor should cover all excavated, steep-walled holes or trenches more than 2 feet deep at the close of each working day with plywood or similar materials or provide one or more escape ramps constructed of earth fill or wooden planks. Before such holes or trenches are filled, the contractor should thoroughly inspect them for trapped animals.

Mitigation Measure BR-3: All trash and food items should be discarded into closed containers and properly disposed of at the end of each workday.

Level of Significance after Mitigation: With implementation of Mitigation Measures BR-1 through BR-3, this impact would be less than significant.

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

No Impact

Chapter 9.30, Tree Protection Standards, of the City's municipal code (City of Clovis 2022b) 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. There is no impact.

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

No Impact

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. There is no impact.

5. Cultural Resources

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Cause a substantial adverse change in the significance of a historical resource pursuant to State CEQA Guidelines § 15064.5?		X		
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to State CEQA Guidelines § 15064.5?		X		
c. Disturb any human remains, including those interred outside of formal cemeteries?		X		

Background

An intensive Phase I cultural resources survey was conducted by ASM Affiliates in November 2022 and a report was prepared in March 2023. The report is included as Appendix C to this Initial Study. This Initial Study incorporates information and analysis from this report to evaluate the impacts on cultural resources.

No cultural resources were discovered within the study area as a result of the cultural resource survey. A search of the Native American Heritage Commission (NAHC) Sacred Lands File was completed in November 2022 with negative results. Project notification letters were sent to tribes listed on the NAHC contact list. One response was received from the Santa Rosa Rancheria Tachi-Yokut Tribe deferring to tribes more local to the study area. The California Historical Resources Information System (CHRIS) was contacted for a search of the cultural resource data at the Southern San Joaquin Valley Information Center (SSJVIC). Data from these files include known and recorded cultural resources sites, inventory and excavation reports, and resources listed on the National Register of Historic Places, the California Office of Historic Preservation Built Environment Resources Directory, California State Historical Landmarks, California Register of Historical Resources, California Inventory of Historic Resources, and California Points of Historical Interest that may be present on the project site. According to the information in the SSJVIC files, there are no recorded resources within the project area.

Would the project:

- a. **Cause a substantial adverse change in the significance of a historical resource pursuant to State CEQA Guidelines Section 15064.5?**

Less than Significant Impact with Mitigation Incorporated

No cultural resources were discovered within the study area as a result of the cultural resource survey. Per the SSJVIC, there are no recorded resources within the project area. There are three recorded resources in the one-half-mile radius: P-10-006897, 006898, and 006899. These resources consist of historic-era single-family residences. In the unlikely event that subsurface cultural resources are discovered during construction, Mitigation Measure CR-1 has been incorporated into the project.

- b. Cause a substantial adverse change in the significance of an archeological resource pursuant to State CEQA Guidelines Section 15064.5?

Less than Significant Impact with Mitigation Incorporated

See E,5.a, above.

- c. Disturb any human remains, including those interred outside of dedicated cemeteries?

Less than Significant Impact with Mitigation Incorporated

In the unlikely event that subsurface human remains are discovered during construction, Mitigation Measure CR-1 has been incorporated into the project.

Mitigation Measure CR-1: If cultural resources are encountered during ground disturbing construction activities, work shall stop in the immediate vicinity of the find and a qualified cultural resources specialist shall be consulted to determine the significance of the resources in accordance with CEQA Guidelines §15064.5. If potentially significant, the specialist shall make recommendations to the District on mitigation measures to be implemented to protect the discovered resources in accordance with CEQA Guidelines §15064.5 and Public Resources Code §21083.2. If human remains are encountered during ground disturbing activities, work shall stop in the immediate vicinity of the find and the County Coroner notified in accordance with Health and Safety Code §7050.5 and CEQA Guidelines §15064.5(e). If the remains are determined to be of Native American descent, the procedures and requirements set forth in CEQA Guidelines §15064.5(d) and (e) and Public Resources Code §5097.98 shall be implemented.

Level of Significance after Mitigation: With implementation of Mitigation Measure CR-1, this impact would be less than significant.

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6. Energy Resources

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?			X	
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?			X	

Background

An Energy Impact Assessment was prepared by Ambient Air Quality & Noise Consulting for this proposed project and is included as Appendix D to this Initial Study. This Initial Study uses information from the analysis to evaluate the proposed project impacts.

In summary, energy sources for the City of Clovis, and the proposed project, are served primarily by Pacific Gas & Electric (PG&E). Energy resources consist largely of natural gas, nuclear, fossil fuels, hydropower, solar, and wind. The primary use of energy is for electricity to operate buildings. Energy use is discussed in greater detail, as follows:

Electricity

Electric services in the City are provided by the regulated electric utility, Pacific Gas and Electric Company (PG&E). All of PG&E's 2019 total electric power mix came from greenhouse gas (GHG)-free sources that include nuclear, large hydro, and renewable energy sources.

Natural Gas

PG&E's natural gas system encompasses approximately 70,000 square miles in Northern and Central California. Approximately 90 percent of the natural gas supply for PG&E is from out-of-state imports. In 2017, natural gas throughput provided by PG&E totaled 800,923 million cubic feet (MMcf). Natural gas throughput has decreased over the past few years. In comparison to the year 2015 throughput, natural gas throughput has decreased by 103,599 MMcf, an approximate 11.5 percent reduction.

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?**

Less than Significant Impact

Implementation of the proposed project would increase electricity, diesel, gasoline, and natural gas consumption associated with construction activities, as well as long-term operational activities. Energy consumption associated with short-term construction and long-term operational activities are discussed in greater detail, as follows:

Construction-Related Energy Consumption

Energy consumption would occur during the construction of the proposed project, including fuel use associated with the on-site operation of off-road equipment and vehicles traveling to and from the construction site. In Appendix D, Table 1 summarizes the levels of energy consumption associated with project construction. As depicted, the operation of off-road construction equipment would use an estimated total of 62,350 gallons of diesel fuel. On-road vehicles would use approximately 4,236 gallons of gasoline and 1,203 gallons of diesel fuel. In total, fuel use would equate to approximately 9,241 million British thermal units (MMBTU) over the life of the construction project. Construction equipment use and associated energy consumption would be typical of that commonly associated with the construction of new land uses. As a result, project construction would not be anticipated to require the use of construction equipment that would be less energy efficient than those commonly used for the construction of similar facilities. Idling of on-site equipment during construction would be limited to no more than five minutes following San Joaquin Valley Air Pollution Control District (SJVAPCD) requirements. Furthermore, on-site construction equipment may include alternatively-fueled vehicles (e.g., natural gas) where feasible. Energy use associated with the construction of the proposed facilities would be temporary and would not be anticipated to result in the need for additional capacity, nor would construction be anticipated to result in increased peak-period demands for electricity. As a result, the construction of proposed facilities and improvements would not result in an inefficient, wasteful, or unnecessary consumption of energy. As a result, impacts are considered less than significant.

Operational Mobile-Source Energy Consumption

Operational mobile-source energy consumption would be primarily associated with trips to and from the project. Fuel uses for opening year conditions are summarized in Table 2 of Appendix D. The vehicle trips associated with the proposed land uses would consume an annual estimated 45,699 gallons of diesel and 91,830 gallons of gasoline. Estimated total fuel usage would equate to the consumption of an estimated 17,328 MMBTU. The proposed project would not result in increased fuel usage that would be considered unnecessary, inefficient, or wasteful. This impact would be considered less than significant.

Operational Building-Use Energy Consumption

The proposed project would result in increased electricity and natural gas associated with the long-term operation of the proposed facilities. It is important to note that the proposed buildings would be required to comply with Title 24 standards for energy-efficiency, which would include increased building insulation and energy-efficiency requirements, including the use of energy-efficient lighting, energy-efficient appliances, and the use of low-flow water fixtures.

The estimated electricity consumption associated with proposed facilities to be constructed as part of the proposed project is summarized in Table 3 of Appendix D. As depicted, new facilities at build-out would result in the consumption of approximately 2,776,874 kilowatt hours per year (kWh/Yr) of electricity and 5,808,168 kilo British thermal units per year (kBtu/Yr) of natural gas. In total, the proposed facilities would consume a total of approximately 15,516 MMBTU/year. The proposed project would comply with the most current building energy-efficient standards (i.e., Title 24). For this reason, implementation of the proposed project would not be anticipated to result in wasteful, inefficient, and unnecessary consumption of energy. As a result, this impact would be considered less than significant.

b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Less than Significant Impact

As discussed earlier in this report, the proposed land uses would not be anticipated to result in wasteful or unnecessary vehicle trips. As a result, the proposed project would not result in increased fuel usage that would be anticipated to conflict with applicable plans, policies, or regulations adopted to reduce future fuel consumption rates.

The State of California's Energy Efficiency Strategic Plan establishes a goal for the development of buildings with net zero energy consumption. This plan includes goals for the construction of new residential, commercial, and governmental buildings. Adherence to current and future Title 24 energy requirements would require the installation of PV systems and an energy storage system to help to reduce the project's building-use energy consumption. The District would ensure operational energy consumption would be substantially reduced beyond those required by Title 24 building energy-efficiency requirements.

The plans for all public-school projects in California must be submitted to the Division of the State Architect (DSA) for plan review and must comply with DSA and California Energy Commission (CEC) Energy Efficiency Standards. These requirements ensure that educational facilities would not result in the inefficient, wasteful, or unnecessary consumption of energy. The project does not conflict with any Clovis general plan policies related to renewable energy or energy efficiency. The impact is less than significant.

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7. Geology and Soils

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
(i) Rupture of a known earthquake fault, as delineated on the most recent Alquist- Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.			X	
(ii) Strong seismic ground shaking?			X	
(iii) Seismic-related ground failure, including liquefaction?			X	
(iv) Landslides?				X
b. Result in substantial soil erosion or the loss of topsoil?			X	
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?			X	
d. Be located on expansive soil, as defined in Table 18-a-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?			X	
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?				X
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?			X	

Would the project:

- a. **Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:**
 - (i) **Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.**

Less Than Significant Impact

The site is not located in an Alquist-Priolo Fault Rupture Hazard Zone. The closest Fault Rupture Hazard Zone is associated with the Nunez Fault, approximately 60 miles southwest of the site (BSK Associates 2022). The impact is less than significant.

(ii) Strong seismic ground shaking?

Less Than Significant Impact

In general, the site has been subjected to relatively low intensity ground motion, primarily from large earthquakes on distant faults and low magnitude earthquakes closer to the site (BSK Associates 2022). The impact is less than significant.

(iii) Seismic-related ground failure, including liquefaction?

Less Than Significant Impact

Liquefaction and seismic settlement analysis prepared for the site indicated that the potential for liquefaction is low (BSK Associates 2022). The impact is less than significant.

(iv) Landslides?

No Impact

The topography of the study area is essentially level and the potential hazard due to landslides from adjacent properties is not applicable (BSK Associates 2022). There is no impact.

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

Less than Significant Impact

There is a potential for water- or wind-borne erosion and loss of topsoil during the construction phase of the proposed project, primarily due to soil-disturbing activities such as clearing, grubbing, and grading. Once construction is completed, the potential for erosion would be minimal because the ground would be covered by buildings, hard surfaces, and landscaping. The project would be subject to the requirements of the Central Valley Regional Water Quality Control Board and the San Joaquin Valley Air Pollution Control District. General Construction Permit, Order No. R5-2016- 0040 (as updated), regulates construction projects of one acre or more, including the proposed project. Projects obtain coverage under the permit by developing and implementing the Storm Water Pollution Prevention Plans, which must specify best management practices that a project would employ to minimize the pollution of storm water. Best management practices include erosion controls, sediment controls, wind erosion controls, non-storm water management controls, and waste management and controls (i.e., good housekeeping practices). The intent of San Joaquin Valley Air Pollution Control District Regulation VIII (Fugitive PM10 Prohibitions) is to reduce ambient concentrations of fine particulate matter (PM10) by requiring actions to prevent, reduce or mitigate anthropogenic fugitive dust emissions. The regulation includes specific measures for construction projects. The impact is less than significant.

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?

Less than Significant Impact

The Ramona sandy loam, Ramona sandy loam, hard substratum, and San Joaquin loam are not considered to be subject to lateral spreading, subsidence, liquefaction, or collapse (NRCS 2022). The impact is less than significant.

- d. Be located on expansive soil, as defined in Table 18-a-B of the Uniform Building Code (1994), creating substantial risks to life or property?**

Less than Significant Impact

The near-surface soils encountered on the project site exhibit little or no expansion potential (BSK Associates 2022). Soils on the project site are underlain by types that have little to no clays with swelling potential and are not subject to expansion (NRCS 2022). The impact is less than significant.

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

No Impact

The project would connect to the City of Clovis sewer system. It would not involve the use of septic tanks or alternative wastewater disposal systems. There is no impact.

- f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?**

No Impact

There are no known unique paleontological resources or unique geological features on or near the site. There is no impact.

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8. Greenhouse Gas Emissions

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

Background

An Air Quality and Greenhouse Gas Impact Analysis was prepared by Ambient Air Quality & Noise Consulting for this proposed project and is included as Appendix A to this Initial Study. This Initial Study uses information from the analysis to evaluate the proposed project impacts.

Following the SJVAPCD’s *Guidance for Valley Land-use Agencies in Addressing GHG Emission Impacts for New Projects Under CEQA* (SJVAPCD 2009), a project would be considered to have a less than significant impact on climate change if it would comply with at least one of the following criteria:

- Comply with an approved GHG emission reduction plan or GHG mitigation program which avoids or substantially reduces GHG emissions within the geographic area in which the project is located. Such plans or programs must be specified in law or approved by the lead agency with jurisdiction over the affected resource and supported by a CEQA compliant environmental review document adopted by the lead agency, or
- Implement approved best performance standards, or
- Quantify project GHG emissions and reduce those emissions by at least 29 percent compared to Business as Usual (BAU).

The SJVAPCD has not yet adopted BPS for development projects. The quantification of project-generated GHG emissions in comparison to BAU conditions to determine consistency with AB 32’s reduction goals is considered appropriate in some instances. However, based on the California Supreme Court’s decision in *Center for Biological Diversity v. California Department of Fish and Wildlife and Newhall Land and Farming (2015) 224 Cal.App.4th 1105 (CBD vs. CDFW; also known as the “Newhall Ranch case”)*, substantial evidence would need to be provided to document that project-level reductions in comparison to a BAU approach would be consistent with achieving AB 32’s overall statewide reduction goal. Given that AB 32’s statewide goal includes reductions that are not necessarily related to an individual development project, the use of this approach may be difficult to support given the lack of substantial evidence to adequately demonstrate a link between the data contained in the AB 32 Scoping Plan and individual development projects. Alternatively, the Court identified potential options for evaluating GHG impacts for individual development projects, which included a qualitative approach based on consistency with statewide, regional, and local plans.

As of April 2023, neither the City nor ARB has adopted recommended numerical GHG significance thresholds applicable to development projects for CEQA purposes. Therefore, the methodology for

evaluating the project's impacts related to GHG emissions focuses on its consistency with statewide, regional, and local plans that have been adopted to reduce and mitigate GHG emissions. This approach has been deemed appropriate for analyzing a project's GHG impact by the Governor's Office of Planning and Research (OPR) and has been upheld in court challenges (OPR 2018) (*Mission Bay Alliance v. Office of Community Investment & Infrastructure*, 2016). The evaluation of consistency with such plans serves as the sole basis for determining the significance of the project's GHG-related impacts on the environment. The project's GHG emissions have been quantified and are included in this Initial Study for informational purposes.

Would the project:

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

Less than Significant Impact

Short-term Construction

As depicted in Table 9 of Appendix A, the construction of the facility would generate a total of approximately 749.8 MTCO_{2e}. Amortized GHG emissions, when averaged over an assumed 30-year life of the project, would total approximately 25.0 MTCO_{2e}/year. There would also be a small amount of GHG emissions from waste generated during construction; however, this amount is speculative. Construction-generated emissions would vary, depending on the final construction schedules, equipment required, and activities conducted.

Long-term Operation

Operational GHG emissions for the facility's operational years 2028 and 2030 are summarized in Table 10. With the inclusion of amortized construction-generated emissions, the facility would generate a total of approximately 2,085.0 MTCO_{2e}/year under the year 2028 conditions and approximately 2,032.8 MTCO_{2e}/year under the year 2030 conditions. A majority of the project's emissions, roughly 96%, would be associated with the operation of motor vehicles and energy use. Based on the modeling conducted, approximately 58.3% of GHG emissions are generated from mobile sources and 37.9% are the result of energy use. It is important to mention that the inclusion of Mitigation Measure GHG-1 and project compliance with the 2022 Building Energy Efficiency Standards which are anticipated to include requirements for the future installation of onsite solar photovoltaic (PV) systems and an energy storage system (ESS), would further reduce operational GHG emissions. The impact is considered to be less than significant.

- b. **Conflict with any applicable plan, policy, or regulation of an agency adopted to reduce the emissions of greenhouse gases?**

Less than Significant Impact with Mitigation Incorporated

Consistency With Applicable Plans

As discussed above, adherence to applicable GHG emissions reduction plans would correspond to a less than significant impact for project-generated GHG emissions. The City has not adopted a Climate Action Plan or other GHG reduction plan. Applicable GHG-reduction plans related to reducing operational GHG emissions include the FCOG's 2022 *Regional Transportation Plan and Sustainable Communities Strategies* (2022 RTP/SCS) and the ARB's 2022 *Climate Change Scoping Plan*. Project consistency with these plans is discussed in greater detail, as follows:

FCOG 2022 Regional Transportation Plan and Sustainable Communities Strategies

FCOG's 2022 RTP/SCS provides transportation strategies to reduce regional GHG emissions. As discussed in the traffic report, the vehicle miles traveled (VMT) as a result of the project would be below the City's adopted VMT threshold. The consistency with the VMT Threshold ensures that the project would not conflict with planned growth and applicable goals contained in the FCOG's 2022 RTP/SCS. For this reason, the proposed project would be considered consistent with FCOG's 2022 RTP/SCS.

ARB California's 2022 Climate Change Scoping Plan

The previously adopted 2017 Climate Change Scoping Plan incorporated the State's GHG emissions reductions target of 40 percent below 1990 emissions levels by 2030, as mandated by SB 32. On November 16, 2022, the ARB approved the 2022 Scoping Plan for Achieving Carbon Neutrality. The recently adopted 2022 Scoping Plan continues the path to achieve the SB 32 2030 target and expands upon earlier Scoping Plans by targeting an 85 percent reduction in GHG below 1990 levels by 2045.

A significant part of achieving the SB 32 goals are strategies to promote sustainable communities, such as the promotion of zero net energy buildings, and improved transportation choices that result in reducing VMT. Other measures include the increased use of low-carbon fuels and cleaner vehicles.

To support the State's GHG emissions reduction goals, including the goals mandated by SB 32, California established the Sustainable Communities and Climate Protection Act (SB 375). SB 375 requires regional metropolitan planning organizations, such as FCOG, to develop SCSs that align transportation, housing, and land use decisions toward achieving the State's GHG emissions-reduction targets. Under SB 375, the development and implementation of SCSs, which link transportation, land use, housing, and climate policy at the regional level, are designed to reduce per capita mobile-source GHG emissions, which is accomplished through the implementation of measures that would result in reductions in per capita VMT.

For land use development projects, additional reductions in GHG emissions may be required to meet the project's fair share of the statewide reductions required to achieve carbon neutrality, consistent with Executive Order B-55-18 and ARB's 2022 Climate Change Scoping Plan. Neither the SJVAPCD nor the City has developed recommended thresholds of significance that are based on achieving an 85 percent reduction by the year 2045. However, other air districts in the State, including the Bay Area Air Quality Management District (BAAQMD) have recently released recommended GHG significance thresholds that are based on a "fair share" approach for achieving carbon neutrality goals. Consistent with this approach, new land use development projects would be considered to be consistent with the State's carbon neutrality goals and would be considered to have a less than significant impact if: 1) the project is deemed consistent with regional VMT-reduction targets; 2) the project prohibits the installation of natural gas infrastructure; and 3) the project would not result in a wasteful, inefficient, or unnecessary energy use as determined by the analysis required under CEQA Section 21100(b)(3) and Section 15126.2(b) of the State CEQA Guidelines. Similarly, the Sacramento Metropolitan Air Quality Management District (SMAQMD) has also recently released Best Management Practices (BMPs), which also include the prohibited installation of natural gas infrastructure for development projects, as well as a requirement that projects meet current CalGreen Tier 2 standards for electric vehicle (EV) spaces, except that EV-capable spaces shall instead be EV ready. This additional requirement requires the installation of electrical infrastructure sufficient to service the future installation of EV chargers. The BAAQMD and SMAQMD thresholds are based on an approach endorsed by the Supreme Court in *Center for Biological Diversity v. Department of Fish & Wildlife*.

Although not located within the above jurisdictions, development in Clovis would be subject to the same statewide building standards (i.e., CalGreen). As a result, development within the City of Clovis and associated GHG emissions would be substantially similar to and comparable to emissions generated by developments within other areas of the state, including the BAAQMD and SMAQMD jurisdictions. Given that climate change is inherently a cumulative impact that occurs on a global scale, these BMPs would, likewise, be considered representative of the project's "fair share" of what would be required to assist the State in meeting its long-term climate goals, including achieving carbon neutrality by 2045, as identified by the BAAQMD and the SMAQMD.

As noted above, the proposed project would be consistent with the regional VMT-reduction targets. However, the proposed project does not include BMPs that would constitute its "fair share" of what would be required to assist the State in meeting its long-term climate goals, including achieving carbon neutrality by 2045. As a result, this impact would be considered potentially significant.

Mitigation Measure GHG-1: In addition to the implementation of Mitigation Measure AQ-1, the following additional measures shall be implemented to ensure the project includes BMPs:

- a. Building mechanical equipment and appliances shall be electrically powered. The installation of natural-gas service/infrastructure shall be prohibited.
- b. Meet current CALGreen Tier 2 standards for electric vehicle (EV) parking spaces, except that all EV parking spaces required by the code shall be "EV-capable" instead of "EV-ready".

Level of Significance after Mitigation: Implementation of Mitigation Measure GHG-1 would prohibit the installation of natural-gas-fueled appliances and building mechanical equipment and ensure the insulation of EV-capable parking spaces. These measures would further reduce on-site emissions of GHGs from the project. With mitigation, the proposed project would not conflict with ARB's *2022 Climate Change Scoping Plan* and would be contributing its fair share toward assisting the State in meeting its goal of carbon neutrality by 2045, per Executive Order B-55-18.

The project's design and implementation of Mitigation Measures ensure alignment with both statewide and regional climate change policies, plans, and strategies. The analysis conducted to assess the consistency of the project with relevant plans, policies, and regulations, including the *2022 Climate Change Scoping Plan* and the FCOG's *2022 RTP/SCS*, confirms that the project complies with these regulatory requirements, with recommended mitigation measures incorporated. With mitigation, the project's GHG emissions would not result in a significant impact on the environment nor conflict with applicable GHG-reduction policies, plans, or regulations. The impact is less than significant with mitigation.

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9. Hazards and Hazardous Materials

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			X	
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?			X	
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?			X	
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				X
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?				X
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				X
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?				X
h. Satisfy the requirements for evaluating the safety of school sites per Public Resources Code Section 21151.8(a)(1)(A) through (D) and CEQA Guidelines Section 15186(c)(1) (A) through (D)?			X	

Would the project:

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

Less than Significant Impact

Construction of the project would involve the transport and use of fuels, lubricants, greases, solvents, and architectural coatings including paints. Operation of the project could involve small quantities of hazardous materials used for cleaning and maintenance purposes: cleansers, solvents, paints, pesticides, and fertilizers. The school would be subject to state and local regulations governing the routine transport, use, and disposal of hazardous materials and the release of hazardous materials into the environment.

Given the characteristics of the project along with the regulations and oversight processes in place to prevent and/or reduce potential impacts, this impact is less than significant.

- b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?**

Less than Significant Impact

The proposed project involves the construction and operation of a special education administration building, an online school, and administrative offices. The potential for the project to emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste is addressed in Section E, 9.a above, and was determined to be less than significant.

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

Less than Significant Impact

Public Resources Code Section 21151.8 and CEQA Guidelines Section 15186 require that a Negative Declaration for a school construction project not be approved unless the District has consulted with the Air Pollution Control District and county health department to determine whether there are any facilities within one-fourth mile of the site that might reasonably be anticipated to emit hazardous air emissions or handle hazardous substances or waste. Although such potential facilities were identified, the health risks from the facilities will not constitute a potential endangerment of public health to persons who would attend or be employed at the proposed project (see Appendix 3).

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

No Impact

Based on a review of the California Department of Toxic Substances Control's EnviroStor website and the State Water Board's Geotracker website, no hazardous materials sites exist on or near the project site. There is no impact.

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

No Impact

The nearest airport is the Fresno Yosemite International Airport in the City of Fresno, which is located approximately five miles southwest of the project site. The proposed project is not located within the projected 60 dBA CNEL/Ldn noise exposure contour of this airport (City of Fresno 2022). No private airstrips were identified within two miles of the project site. Implementation of the proposed project would not result in the exposure of sensitive receptors to excessive aircraft noise levels, nor would the proposed project affect airport operations. There is no impact.

- f. Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?**

No Impact

All schools have emergency response/evacuation plans. Fresno County's Public Health Emergency Preparedness (PHEP) is responsible for developing response plans to be used in the event of a large-scale threat to the health of residents of Fresno County. However, research conducted for this Initial Study did not identify any adopted emergency response plans or emergency evacuation plans the project could impair. There is no impact.

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

No Impact

The project site is not within or near a state responsibility area or a very high fire hazard severity zone, therefore the risk of wildland fires would be considered low. There is no impact.

- h. Satisfy the requirements for evaluating the safety of school sites per Public Resources Code Section 21151.8(a)(1)(A) through (D) and CEQA Guidelines Section 15186(c)(1) (A) through (D)?**

Is the property:

The site of a current or former hazardous waste or solid waste disposal facility and, if so, has the waste been removed?

No Impact

Based on a review of the California Department of Toxic Substances Control's EnviroStor website and the State Water Board's Geotracker website, no hazardous waste or solid waste disposal facility exists on or near the project site. There is no impact.

A hazardous substance release site identified by the Department of Toxic Substances Control in a current list adopted according to Section 25356 of the Health and Safety Code for removal or remedial action pursuant to Chapter 6.8 (commencing with Section 25300) of Division 20 of the Health and Safety Code?

No Impact

Based on a review of the California Department of Toxic Substances Control's EnviroStor website and the State Water Board's Geotracker website, no hazardous substance release sites exist on or near the project site. There is no impact.

The site of one or more buried or above ground pipelines that carry hazardous substances, acutely hazardous materials, or hazardous wastes, as defined in Division 20 of the Health and Safety Code? This does not include a natural gas pipeline used only to supply the school or neighborhood.

No Impact

Based on the Phase I Environmental Site Assessment prepared for the property, there are no hazardous pipelines on the site (URS 2015). There is no impact.

Within 500 feet of the edge of the closest traffic lane of a freeway or other busy traffic corridor?

Less than Significant Impact

Freeway 168 is located 1,200 feet north of the project site. The site is located adjacent to Herndon Avenue, a six-lane divided arterial street. High-volume roadways of concern are defined as urban roads having volumes of 100,000 vehicles per day, or more, or rural roads having 50,000 vehicles per day.² Existing traffic volumes along Herndon Avenue average approximately 20,784 vehicles per day.³ Therefore, health risks to onsite students and employees would not be anticipated to exceed applicable thresholds.

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² California Air Resources Board (ARB). April 2005. Air Quality and Land Use Handbook – A Community Health Perspective.

³ City of Clovis. Speed Limits and Traffic Count Viewer C001. Website url: <https://cloviswebgis.maps.arcgis.com/apps/webappviewer/index.html?id=d318daa852164de3ac4d3b5963875961>.

10. Hydrology and Water Quality

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

Would the project:

- a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?**

Less Than Significant Impact

The proposed project design must comply with existing policies and standards of the City, FID, and FMFCD. Each agency reviews plans to ensure that water quality standards are not violated and that waste discharge requirements are adhered to during construction and operation. Because of agency regulatory and permitting requirements, the impact is less than significant.

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

Less Than Significant Impact

The proposed project site is underlain by the Kings Groundwater Basin (Basin). The Basin has been identified as critically overdrafted. The Clovis General Plan EIR identified a net decrease in the groundwater aquifer throughout the region (City of Clovis 2014a).

However, because the City's domestic water system is primarily served through the City's Surface Water Treatment Plant using surface water via existing water entitlements, this reduces the need for pumped groundwater. The City has also expanded the capacity of the Water Reuse Facility. The City will meet its projected water needs over the next 25-30 years while protecting groundwater resources, reducing historic groundwater overdraft, and enhancing groundwater recharge. According to the Water Master Plan Final EIR (City of Clovis 2018), the City has taken actions to reduce groundwater overdraft such as increasing the use of surface water supplies to reduce reliance on groundwater, increasing efforts to implement intentional recharge and maintaining existing recharge basins to maximize intentional recharge amounts. For these reasons, the project's impact on groundwater supply is less than significant.

- 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;**
 - ii. **Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;**
 - 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**
 - iv. **Impede or redirect flood flows?**

Less than Significant Impact

The project site is located on an infill site that is generally flat and surrounded by existing commercial development and urban residences. There are no streams or rivers on the site that would be altered. The site is bare ground and pervious to water. Construction of the project would increase the amount of impervious surface by installing buildings, parking, a roadway, and sidewalks. The project is within the FMFCD boundary and is subject to its standards and requirements (see Appendix 1). Therefore, the impact is less than significant.

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

No impact

Due to the project's location far away from the Pacific Ocean, the potential for impact from a tsunami is negligible. No large bodies of water occur within 15 miles. Therefore, seiche hazards at the site are not considered possible. The site is not within a Federal Emergency Management Agency (FEMA) designated Flood Zone or a dam flood inundation area (BSK Associates 2022). There is no impact.

- e. **Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?**

Less than Significant Impact

The project site is subject to the Water Quality Control Plan for the San Joaquin River Basin (California Regional Water Quality Control Board 2019). As such, this project will comply with applicable policies and standards. The Sustainable Groundwater Management Act of 2014 (SGMA) 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 Groundwater Sustainability Agency (GSA). The GSA adopted a Groundwater Sustainability Plan (GSP) in 2019. The City as an implementing agency within the GSA will construct several GSP-approved projects to increase the recharge of surface water and sewer-treated water, install new water meters, and recharge basins (North Kings Groundwater Sustainability Agency 2022). The GSP accommodates a full buildout of the City of Clovis and would achieve groundwater sustainability by 2040. The impact is less than significant.

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11. Land Use and Planning

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Physically divide an established community?				X
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?			X	

Would the project:

a. Physically divide an established community?

No Impact

The physical division of an established community typically refers to the construction of a physical feature (such as an interstate highway or railroad tracks) or the removal of a means of access (such as a local road or bridge) that would impair mobility within an existing community, or between a community and outlying areas.

The project site is a small infill area, 16.61 acres, surrounded by commercial development and urban residences within the City of Clovis. The proposed project would not construct features that would physically divide an established community or remove means of access that would impair mobility in a community. There is no impact.

b. Conflict with any land use plan, policy or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Less than Significant Impact

The designated land use for the project site, according to the City of Clovis General Plan, is General Commercial. The project site is currently zoned for single family residential development, which is not up to date and consistent with the current general plan land use designation. The characteristics of the project, which essentially operates mostly as an office-type development, would be compatible with both nearby commercial and residential uses. Educational uses are allowed in the current residential zone districts (R-A and R-1) per the City of Clovis Development Code. Based on the above, the impact is less than significant.

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12. Mineral Resources

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?				X
b. Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?				X

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?**

No Impact

See 12.b, below.

- 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?**

No Impact

The project would not result in the loss of availability of a known mineral resource because no known resources exist on or near the proposed school site. Likewise, the project would not result in the loss of availability of a locally important mineral resource recovery site because none exists on or near the proposed school site. (County of Fresno General Plan Background Report 2000). There is no impact.

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13. Noise

Would the project result in:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?		X		
b. Generation of excessive groundborne vibration or groundborne noise levels?		X		
c. For a project located within a private airstrip or airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?			X	

Background

A Noise and Groundborne Vibration Impact Analysis was prepared by Ambient Air Quality & Noise Consulting for this proposed project and is included as Appendix E to this Initial Study. This Initial Study uses information from the analysis to evaluate the proposed project impacts.

Noise

In summary, noise-sensitive land uses are generally considered to include those uses where noise exposure could result in health-related risks to individuals, as well as places where quiet is an essential element of their intended purpose. Residential dwellings are of primary concern because of the potential for increased and prolonged exposure of individuals to both interior and exterior noise levels. Schools, churches, hotels, libraries, and other places where low interior noise levels are essential are considered noise-sensitive land uses.

To document existing ambient noise levels in the project area, short-term (ST) ambient noise measurements were conducted on March 30, 2023. As indicated in Appendix E, measured ambient noise levels in the project area ranged from approximately 44 to 71 dBA Leq. Ambient noise levels within the project area are predominantly influenced by vehicle traffic on area roadways. Ambient noise levels during the evening and nighttime hours are generally 5 to 10 dB lower than daytime noise levels.

Groundborne Vibration

While groundborne vibration is related to noise, it differs in that noise is generally considered to be pressure waves transmitted through air, whereas vibration usually consists of the excitation of a structure or surface. The effects of groundborne vibration levels, concerning human annoyance and structural damage, are influenced by various factors, including ground type, distance between source and receptor, and duration. Overall effects are also influenced by the type of vibration event, defined as either continuous or transient. Continuous vibration events would include most construction equipment, including pile drivers, and compactors, whereas, transient sources of vibration create single isolated vibration events, such as demolition ball drops and blasting. Threshold criteria for continuous and transient events are summarized in Table 5 of Appendix E.

The CEQA Guidelines do not define the levels at which temporary and permanent increases in ambient noise are considered “substantial.” As discussed previously in this section, a noise level increase of 3 dBA is barely perceptible to most people, an increase of 5 dBA is readily noticeable, and a difference of 10 dBA would be perceived as a doubling of loudness. For purposes of this analysis, a substantial increase in ambient noise levels would be defined as an increase of 5 dBA, or greater, and considered a significant increase if it would exceed the City’s normally acceptable noise standards for land use compatibility or noise control ordinance.

The CEQA Guidelines also do not define the levels at which groundborne vibration levels would be considered excessive. For this reason, Caltrans recommended that groundborne vibration thresholds be used for the evaluation of impacts based on increased potential for structural damage and human annoyance, as identified in Appendix E. For purposes of the following analysis, risks of architectural damage (i.e., minor cracking of plaster walls and ceilings) would be considered potentially significant if construction-generated ground vibration levels at nearby structures would exceed 0.5 in/sec peak particle velocity (ppv). Ground vibration above 0.2 in/sec ppv would be expected to result in a potential for significant short-term increases in levels of annoyance for occupants of nearby buildings.

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?**

Less than Significant Impact with Mitigation Incorporated

Noise generated by the proposed project would occur during short-term construction and long-term operation. Noise-related impacts associated with short-term construction and long-term operations of the proposed project are discussed separately, as follows:

Short-term Construction Noise Levels

Construction noise typically occurs intermittently and varies depending upon the nature or phase (e.g., demolition/land clearing, grading and excavation, erection) of construction. Noise generated by construction equipment, including earth movers, material handlers, and portable generators, can reach high levels. Although noise ranges were found to be similar for all construction phases, the initial site preparation phases, including demolition and grading/excavation activities, tend to involve the most equipment and result in the highest average-hourly noise levels.

Instantaneous noise levels (in dBA L_{max}) generated by individual pieces of construction equipment typically range from the mid-70s to the low 90s dBA L_{max} at 50 feet. Typical operating cycles may involve 2 minutes of full power, followed by 3 or 4 minutes at lower settings. Average-hourly noise levels for individual equipment generally range from approximately 73 to 82 dBA L_{eq} . Based on typical off-road equipment usage rates and assuming multiple pieces of equipment operating simultaneously within a localized area, such as soil excavation activities, average-hourly noise levels could reach levels of approximately 80 dBA L_{eq} at roughly 100 feet.

The City has not adopted noise standards that apply to short-term construction activities. However, based on screening noise criteria commonly recommended by federal agencies, construction activities would generally be considered to have a potentially significant impact if average-hourly daytime noise levels

would exceed 80 dBA L_{eq} at noise-sensitive land uses, such as residential land uses (FTA 2006). Depending on the location and types of activities conducted (e.g., demolition, site prep, grading, construction, and architectural coating), predicted noise levels at the nearest residences, which are located adjacent to the eastern and southern property lines, could potentially exceed 80 dBA L_{eq} . Furthermore, concerning residential land uses, activities occurring during the more noise-sensitive evening and nighttime hours could result in increased levels of annoyance and potential sleep disruption. For these reasons, noise-generating construction activities would be considered to have a potentially significant short-term noise impact.

Mitigation Measure N-1: The following measures shall be implemented to reduce construction-generated noise levels:

- a. Construction activities (excluding activities that would result in a safety concern to the public or construction workers) shall be limited to between the hours of 7:00 a.m. and 7:00 p.m. Monday through Friday and between 9:00 a.m. and 5:00 p.m. Saturday and Sunday. Additionally, from June 1st through September 15th permitted construction hours shall be limited to between the hours of 6:00 a.m. and 7:00 p.m. Monday through Friday.
- b. Construction truck trips shall be scheduled, to the extent feasible, to occur during non-peak hours and truck haul routes shall be selected to minimize impacts to nearby residential dwellings.
- c. Construction equipment shall be properly maintained and equipped with noise-reduction intake and exhaust mufflers and engine shrouds, following manufacturers' recommendations. Equipment engine shrouds shall be closed during equipment operation.
- d. Stationary construction equipment (e.g., portable power generators) should be located at the furthest distance possible from nearby residences. If deemed necessary, portable noise barriers shall be erected sufficiently to shield nearby residences from the direct line-of-sight of stationary construction equipment.
- e. When not in use, all equipment shall be turned off and shall not be allowed to idle. Provide clear signage that posts this requirement for workers at the entrances to the site.

Significance After Mitigation: Implementation of Mitigation Measure N-1 would reduce individual equipment noise levels by approximately 10 dBA. Implementation of the above mitigation measures would limit construction activities to the less noise-sensitive periods of the day. With the implementation of the above mitigation measures, this impact would be considered less than significant.

Long-term Operational Noise Levels

Roadway Traffic

Implementation of the proposed project would result in increased traffic volumes on some area roadways. The increase in traffic volume resulting from the implementation of the proposed project would, therefore, contribute to predicted increases in traffic noise levels. Predicted changes in traffic noise levels in comparison to existing without project and existing with project conditions are discussed, as follows:

Predicted existing traffic noise levels and increases associated with the implementation of the proposed project are summarized in Appendix E. As depicted, implementation of the proposed project would result in predicted increases in traffic noise levels of approximately 0.4 dBA, or less, along primarily affected area roadway segments. Predicted cumulative traffic noise levels and increases associated with the implementation of the proposed project are summarized in Appendix E. As depicted, implementation of

the proposed project would result in predicted increases in traffic noise levels of approximately 0.4 dBA, or less, along primarily affected area roadway segments. Perceptible changes in ambient noise levels do not typically occur at levels below 3 dBA. Based on the modeling analysis presented in Appendix E, the implementation of the proposed project would not result in a significant increase in traffic noise levels at nearby noise-sensitive land uses. As a result, predicted increases in traffic noise levels associated with the implementation of the proposed project would be considered less than significant.

Vehicle Parking Areas

The proposed project includes the construction of new parking areas. Based on a conservative assumption that all parking spaces within these parking areas would be accessed over one hour, predicted daytime noise levels at the property line of the nearest residential dwellings would range from approximately 30 dBA L_{eq} to 43 dBA L_{eq} . Predicted noise levels would not exceed the City's daytime noise standard of 50 dBA L_{eq} . As a result, this impact is considered less than significant.

Building Mechanical Equipment

The proposed project would result in increased stationary source noise levels, primarily associated with building mechanical equipment (e.g., heating ventilation and air handling/cooling systems). Each air handling/cooling system would have one condenser and two fans. Based on noise measurement data for similar commercial-use air handling and cooling systems (Lennox Elite Series EL120XCSS) (Lennox 2022), representative operational noise levels would be approximately 79 dBA at 3 feet. Building equipment such as HVAC systems and boilers, would be located on the rooftop or within the interior of the structure and shielded from direct public exposure.

The nearest noise-sensitive land use is a residential dwelling located approximately 55 feet south of the proposed Online School building. Based on this distance and the operational noise levels noted above, predicted operational noise levels at this nearest residence would be approximately 54 dBA L_{eq} , or less. The predicted operational noise levels would not exceed the City's daytime noise standard. However, predicted operational noise levels would exceed the City's nighttime standard. As a result, this impact would be considered potentially significant.

Mitigation Measure N-2: The following measures shall be implemented to reduce long-term operational noise impacts:

- a. Building mechanical equipment (e.g., HVAC units) associated with the proposed buildings shall be shielded from direct line-of-sight of nearby residential land uses. It is recommended that air conditioning units be located on roof-top areas and shielded from the line of sight of nearby residential land uses by incorporation of shielding or building parapets along the perimeter of the roof.
- b. Mechanical equipment placed on roof-top areas shall include at a minimum a 5-foot setback.

Significance After Mitigation: Implementation of Mitigation Measure N-2 would require building mechanical equipment (e.g., exhaust fans, air conditioning units) to be shielded from the direct line of sight of nearby residential land uses, which would reduce predicted operational noise levels. With mitigation, the operation of onsite building mechanical equipment would be reduced by approximately 5 dB. Based on this distance, the operational noise levels noted above, and a 5 dB line of sight reduction, predicted operational noise levels at this nearest residence would be approximately 49 dBA L_{eq} , or less. For this reason and with mitigation, this impact would be considered less than significant.

b. Generation of excessive groundborne vibration or groundborne noise levels?

Less than Significant Impact

Long-term operational activities associated with the proposed project would not involve the use of any equipment or processes that would result in potentially significant levels of ground vibration. Increases in groundborne vibration levels attributable to the proposed project would be primarily associated with short-term construction-related activities. Construction activities associated with the proposed improvements would likely require the use of various off-road equipment, such as tractors, concrete mixers, and haul trucks. The use of major groundborne vibration-generating construction equipment, such as pile drivers, would not be required for this project.

Groundborne vibration levels associated with representative construction equipment are summarized in Appendix E. As depicted, ground vibration generated by construction equipment would be approximately 0.089 in/sec ppv, or less, at 25 feet. Predicted vibration levels at the nearest existing structures would be approximately 0.114 in/sec ppv and are not anticipated to exceed commonly applied criteria for structural damage or human annoyance (i.e., 0.5 and 0.2 in/sec ppv, respectively). In addition, no fragile structures have been identified in the project area. As a result, this impact would be considered less than significant.

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?

Less than Significant Impact

The nearest airport in the project vicinity is the Fresno Yosemite International Airport, which is located approximately 4.5 miles to the southwest. The proposed project is not located within the projected 60 dBA CNEL/L_{dn} noise contours of these airports (City of Clovis 2014). No private airstrips were identified within two miles of the project site. Implementation of the proposed project would not result in the exposure of sensitive receptors to aircraft noise levels, nor would the proposed project affect airport operations. This impact is considered less than significant.

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14. Population and Housing

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Induce substantial unplanned population growth either in an area, directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?			X	
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				X

Would the project:

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

Less than Significant Impact

The project is located on an in-fill site within the City of Clovis, surrounded by commercial development and urban residences. The site is designated for General Commercial use in the Clovis General Plan and urban infrastructure is adjacent to the site. No aspects of the project's location, design, or operational features have been identified as having potential to cause a substantial effect on population growth that would differ from the growth planning set forth in the City of Clovis General Plan. Any growth-inducing impact would be less than significant.

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

No Impact

The project site is vacant. Therefore, the project would not result in the displacement of existing people or housing. There is no impact.

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15. Public Services

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities or need for new or physically altered government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:			X	
(i) Fire Protection?			X	
(ii) Police Protection?			X	
(iii) Schools?			X	
(iv) Parks?			X	
(v) Other public facilities?			X	

- a. **Would the project result in substantial adverse physical impacts associated with the provision of new or altered governmental facilities, need for new or 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 following public services: fire protection, police protection, schools, parks, and other public facilities?**

Less than Significant Impact

The project would not result in the need for new or physically altered fire protection, police protection, parks, or other public facilities to maintain acceptable service ratios, response times, or other performance objectives. The project site is an in-fill site surrounded by commercial and residential development in an area already well-served by public services. The impact is less than significant.

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16. Recreation

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

- 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?**

No Impact

There are no parks adjacent or nearby the project site (the closest park is Sierra Bicentennial Park approximately 0.5 miles southwest of the project site) and there are no aspects of the project that would result in an increased use of existing parks and recreation facilities. There is no impact.

- b. **Does the project include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?**

No Impact

No new recreational facilities would be constructed on the project site. There is no impact.

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17. Transportation

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

Background

The discussion of transportation and traffic impacts in this section reflects the information in the Traffic Impact Analysis (TIA) and Vehicle Miles Traveled (VMT) Analysis prepared by JLB Traffic Engineering, Inc and are included as Appendices F and G to this Initial Study, respectively.

Important roadways serving the project are described below:

Fowler Avenue

Fowler Avenue is an existing north-south four-lane divided arterial adjacent to the proposed Project site. In this area, Fowler Avenue is a three-lane divided arterial between Shepherd Avenue and Teague Avenue, a two-lane undivided arterial between Teague Avenue and Nees Avenue, and a four-lane divided arterial between Nees Avenue and Ashlan Avenue. The City of Clovis General Plan Circulation Element designates Fowler Avenue as an arterial through the City of Clovis Sphere of Influence (SOI).

Ash Avenue

Ash Avenue is an existing north-south two-lane undivided local roadway in the vicinity of the proposed Project site. In this area, Ash Avenue is a two-lane undivided local roadway through the City of Clovis SOI. The City of Clovis General Plan Circulation Element designates Ash Avenue as a local roadway through the City of Clovis SOI.

Armstrong Avenue

Armstrong Avenue is an existing north-south four-lane undivided collector in the vicinity of the proposed Project site. In this area, Armstrong Avenue is a two-lane undivided collector between Teague Avenue and Herndon Avenue, a four-lane undivided collector between Herndon Avenue and Poison Avenue, a two-lane collector divided by a two-way left-turn lane between Polson Avenue and Gettysburg Avenue and a two- to three-lane undivided collector between Gettysburg Avenue and Ashlan Avenue. The City of Clovis General Plan Circulation Element designates Armstrong Avenue as a collector through the City of Clovis SOI.

Herndon Avenue

Herndon Avenue is an existing east-west six-lane divided arterial adjacent to the proposed Project site. In this area, Herndon Avenue is a six-lane divided expressway between Willow Avenue and State Route 168, a six-lane divided arterial between State Route 168 and Armstrong Avenue, a five-lane divided arterial between Armstrong Avenue and Coventry Avenue, a two-lane undivided arterial between Coventry Avenue and Del Rey Avenue and an undivided rural arterial between Del Rey Avenue and Academy Avenue. The City of Clovis General Plan Circulation Element designates Herndon Avenue as an expressway between Willow Avenue and State Route 168, an arterial between State Route 168 and Del Rey Avenue, and a rural arterial between Del Rey Avenue and Academy Avenue.

Tollhouse Road

Tollhouse Road is an existing southwest-northeast two-lane collector divided by a two-way left-turn lane in the vicinity of the proposed Project site. This roadway will be described as an east-west roadway for this TIA. In this area, Tollhouse Road is a two-lane collector divided by a two-way left-turn lane between Sunnyside Avenue and Herndon Avenue and a two-lane undivided local roadway between Herndon Avenue and Magnolia Avenue. The City of Clovis General Plan Circulation Element designates Tollhouse Road as a collector between Sunnyside Avenue and Herndon Avenue and a local roadway between Herndon Avenue and Magnolia Avenue.

Level of Service

The potential traffic impacts of the proposed project were evaluated following the standards set forth by the Level of Service (LOS) policies of the City of Clovis, County of Fresno, and Caltrans for the following traffic conditions: Existing Traffic Conditions, Existing plus Project Traffic Conditions, Near Term plus Project Traffic Conditions, Cumulative Year 2046 No Project Traffic Conditions, and Cumulative Year 2046 plus Project Traffic Conditions. Study intersections include:

- a. Fowler Avenue / Herndon Avenue
- b. Project Driveway A / Herndon Avenue
- c. Ash Avenue / Herndon Avenue
- d. Armstrong Avenue / Herndon Avenue
- e. Fowler Avenue / Project Driveway B
- f. Fowler Avenue / Tollhouse Road

Vehicle Miles Traveled

Senate Bill (SB) 743 requires that relevant California Environmental Quality Act (CEQA) analysis of transportation impacts be conducted using a metric known as Vehicle Miles traveled (VMT) instead of level of service (LOS). VMT measures how much actual auto travel (additional miles driven) a proposed project would create on California roads. If the project adds excessive car travel onto our roads, the project may cause a significant transportation impact.

The CEQA Guidelines were amended to implement SB 743, by adding Section 15064.3. Among its provisions, Section 15064.3 confirms that except concerning transportation projects, a project's effect on automobile delay shall not constitute a significant environmental impact. Therefore, LOS measures of impacts on traffic facilities are no longer relevant CEQA criteria for transportation impacts. However, the City of Clovis, as well as the City of Fresno and Fresno County still have LOS-based policies included in their respective General Plans, thus the long-range transportation planning for the greater Fresno/Clovis area remains informed by LOS-related considerations.

Would the project:

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

Less than Significant Impact

City of Clovis General Plan

The City of Clovis General Plan has established LOS D as the acceptable level of traffic congestion on most major streets. Therefore, LOS D is used to evaluate the potential significance of LOS impacts on the City of Clovis roadway facilities according to the City of Clovis General Plan. The Fresno County General Plan has established LOS C as the acceptable level of traffic congestion on county roads and streets that fall entirely outside the Sphere of Influence (SOI) of a City (Fresno County 2000). For those areas that fall within the SOI of a City, the LOS threshold of the City is used in this report. In this case, all study facilities fall within the City of Clovis SOI, therefore, the City of Clovis LOS thresholds are utilized. Caltrans no longer considers delay as a significant impact to the environment, for land use projects and plans. According to the Caltrans document VMT Focused Transportation Impact Study Guidelines dated May 2020, Caltrans's review of land use projects and plans is focused on a VMT metric consistent with CEQA. In this TIA, however, all study intersections fall within the City of Clovis SOI. Therefore, the City of Clovis LOS thresholds were utilized.

Existing Traffic Conditions. All study intersections operate at an acceptable LOS during both peak periods.

Existing plus Project Traffic Conditions. Under this scenario, all study intersections are projected to operate at an acceptable Level of Service (LOS) during both AM and PM peak hour periods.

Near Term plus Project Traffic Conditions. Under this scenario, the study intersection of Ash Avenue at Herndon Avenue is projected to exceed its LOS threshold during the PM peak period. It should be noted that this project does not have a significant impact on this intersection as the delay increases by 0.2 seconds from the Existing Traffic Conditions PM peak to the Existing Plus Project Traffic Conditions PM Peak. Furthermore, this intersection exceeds its LOS threshold by just 2.6 seconds for less than one hour during the day. A traffic signal would not be recommended to improve a leg of an intersection that can only make right-turn movements. A second right-turn lane would not be recommended as the visibility safety hazards created would outweigh the benefits caused by this improvement. Therefore, it is determined that the delay at this intersection is adverse but less than significant.

Cumulative Year 2046 No Project Traffic Conditions. Under this scenario, the study intersection of Ash Avenue at Herndon Avenue is projected to exceed its LOS threshold during the PM peak period. This intersection exceeds its LOS threshold by just 2.4 seconds for less than one hour during the day. A traffic signal would not be recommended to improve a leg of an intersection that can only make right-turn movements. A second right-turn lane would not be recommended as the visibility safety hazards created would outweigh the benefits caused by this improvement. Therefore, it is determined that the delay at this intersection is adverse but less than significant.

Cumulative Year 2046 plus Project Traffic Conditions. Under this scenario, the study intersection of Ash Avenue at Herndon Avenue is projected to exceed its LOS threshold during the PM peak period. It should be noted that this Project does not have a significant impact on this intersection as the delay increases by

only 0.2 seconds from the Cumulative Year 2046 No Project Traffic Conditions PM peak to the Cumulative Year 2046 plus Project Traffic Conditions PM Peak. Furthermore, this intersection exceeds its LOS threshold by just 2.6 seconds for less than one hour during the day. A traffic signal would not be recommended to improve a leg of an intersection that can only make right-turn movements. A second right-turn lane would not be recommended as the visibility safety hazards created would outweigh the benefits caused by this improvement. Therefore, it is determined that the delay at this intersection is adverse but less than significant.

Clovis Bicycle Transportation Master Plan

The Clovis Bicycle Transportation Master Plan (City of Clovis 2011) includes a bicycle facility map that identifies existing & proposed bicycling facilities, as well as their connection to major activity centers. The 2021 Clovis Active Transportation Plan Update (Plan) (City of Clovis 2021) supports walking, bicycling, transit, and the use of other emerging modes of personal transport as alternatives to driving within Clovis, neighboring cities, and regional destinations. The Plan identifies Fowler Avenue, between Bullard and Nees Avenues as a future Class II Bicycle Buffered Lane which would provide more separation between people bicycling and people driving. Class II bikeways (bike lanes) are for the preferential use of bicycles and may be established within the roadbed. They are located immediately adjacent to a traffic lane. A buffered bike lane may also be established within the roadbed, separated by a marked buffer between the bike lane and the traffic lane or parking lane.

California Highway Design Manual (Caltrans 2019) requires a minimum Class II Bike Lane width of 4 feet, except where:

- Adjacent to on-street parking, the minimum bike lane should be 5 feet.
- Posted speeds are greater than 40 miles per hour, the minimum bike lane should be 6 feet

There is no on-street parking along Fowler Avenue. The posted speed limit is 40 mph. As part of the Project review process, the plans would undergo review by multiple City departments, such as planning and engineering, to ensure that the site layout conforms to existing regulations. During this review, the project would need to make the necessary corrections to ensure that no hazardous design features would result from the project. Therefore, because the project would undergo a site plan and design review to ensure consistency and adherence to applicable design and site layout guidelines, the impact would be less than significant.

b. Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

Less than Significant Impact

The City of Clovis VMT Guidelines provide that the Fresno County average VMT per Capita (appropriate for residential land uses) and Employee (appropriate for office/commercial non-retail land uses) are 16.1 and 25.6, respectively. The City's threshold targets a 13% reduction in VMT for residential and office/commercial non-retail land uses and a net zero (0) increase in regional VMT for commercial retail land uses. After coordination with the City of Clovis, it was determined that this project would be analyzed as an office land use due to the majority of the trips being generated by employees.

Residential and office development projects that generate VMT above a 13% reduction from the existing regional VMT per capita or per employee would have a significant environmental impact. Projects that reduce VMT by 13% or more are less than significant. The target VMT for residential and commercial non-

retail land uses are $(16.1 \times (1-.13)) = 14.0$ 14.0 VMT per capita and $(25.6 \times (1-.13)) = 22.3$ 22.3 VMT per employee, respectively.

A quantitative analysis of VMT impacts was prepared and compared against the VMT threshold of significance. The VMT analysis indicates that the project would generate a VMT per employee of 17.2, which is below the threshold of 22.3 VMT per employee. Therefore, the impact is less than significant.

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

Less than Significant Impact

The roadways providing access to the project site, Fowler Avenue and Herndon Avenue, were previously constructed to City roadway standards. The project would result in a significant impact if it would include features that would create a hazard such as a sharp curve in a new roadway or create a blind corner or result in sight distance issues from entryways. Based on review by City departments, there are no hazardous design features resulting from the project. Therefore, the impact is less than significant.

- d. **Result in inadequate emergency access?**

Less than Significant Impact

Based on the project site plan (Figure 3), access to and from the project site will be from two (2) access points. One driveway will be located on the south side of Herndon Avenue approximately 965 feet east of Fowler Avenue and is proposed to have right-in right-out access. The second driveway will be located on the east side of Fowler Avenue approximately 675 feet south of Herndon Avenue and is proposed to have right-in, right-out, and left-in access. This project driveway will be aligned with the driveway on the west side of Fowler Avenue.

For school projects, the Department of the State Architect (DSA) reviews plans to assure project compliance with code requirements related to structural safety; fire and life safety; accessibility; and sustainability. The Clovis Fire Department would review all plans to ensure adequate emergency access is provided. Therefore, because of existing codes and review requirements, this impact would be less than significant.

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18. Tribal Cultural Resources

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in the Public Resource Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
(i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in the Public Resources Code § 5020.1(k)?			X	
(ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe?			X	

- a. **Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:**
- (i) **Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?**
 - (ii) **A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?**

Less than Significant Impact

Research performed as part of this Initial Study did not identify any known tribal cultural resources at the project site. A Phase I cultural resources survey performed for the site did not identify any cultural resources on the site (see Appendix C of this Initial Study). A California Historical Resources Information System (CHRIS) records search was conducted through the Southern San Joaquin Valley Information Center (SSJVIC) and there are no recorded resources within the project area. A Native American Heritage Commission (NAHC) Sacred Lands File search was conducted, which was negative. A Request for Preliminary Comment and AB 52 Notification was sent to each of the eleven tribes identified by the NAHC. One response was received from the Santa Rosa Rancheria Tachi-Yokut Tribe deferring to tribes more local to the study area. Based on the above, this impact is less than significant.

19. Utilities and Service Systems

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 of which could cause significant environmental effects?			X	
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?			X	
c. Result in determination by the wastewater treatment provider, which serves or may serve the project, that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?			X	
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?			X	
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?			X	

Would the project:

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

Less than Significant Impact

The following utilities and services are provided. Pacific Gas & Electric (PG&E) provides electricity and natural gas services. The City's water supply sources include groundwater drawn from the Kings Sub-basin of the San Joaquin Valley Groundwater Basin and surface water from FID. Surface water is treated at the Clovis Surface Water Treatment Facility. The project is within the existing FMFCD storm drainage master plan areas and will be required to comply with FMFCD drainage improvement requirements (see Appendix 1). The City also provides sewer collection services to its residents and businesses. Treatment of wastewater occurs at the Fresno-Clovis Regional Wastewater Treatment Plant (RWTP). The Fresno-Clovis RWTP is operated and maintained by the City of Fresno and operates under a waste discharge requirement issued by the Central Valley Regional Water Quality Control Board. Utility infrastructure is largely in place thus no construction or relocation is anticipated that would cause significant environmental effects. The impact is less than significant.

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

Less than Significant Impact

The City's domestic water system is primarily served through the City's Surface Water Treatment Plant using surface water via existing water entitlements, which reduces the need for pumped groundwater. The City has also expanded the capacity of the Water Reuse Facility. The City will meet its projected water needs over the next 25-30 years while protecting groundwater resources, reducing historic groundwater overdraft, and enhancing groundwater recharge. The project site is designated for general commercial use by the City of Clovis General Plan and was accounted for in water supply planning for the city. The project's water use characteristics would be very similar to general commercial development. No indication has been provided by the City of Clovis in response to the development review process or the CEQA preliminary request for comment on the project that water supply would be an issue. The impact is less than significant.

- 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?**

Less than Significant Impact

The project site is designated for general commercial use by the City of Clovis General Plan and was accounted for in wastewater collection and treatment planning for the city. The project's wastewater generation characteristics would be very similar to general commercial development. No indication has been provided by the City of Clovis in response to the development review process or the CEQA preliminary request for comment on the project that wastewater treatment would be an issue. The impact is less than significant.

- e. **Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?**

Less than Significant Impact

The project would generate solid waste during construction and operation. However, the District would be required to comply with Chapter 6.3.1, Recycling and Diversion of Construction and Demolition Debris, of the Clovis Municipal Code (CMC) during construction. This section of the CMC requires that a minimum of fifty percent (50%) of waste tonnage from a project be diverted from disposal and that all new residential (and commercial) construction within the City shall submit and obtain approval for a waste management plan before construction activities. The impact is less than significant.

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20. Wildfire

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?				X
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from wildfire or the uncontrolled spread of wildfire?				X
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 the temporary or ongoing impacts to the environment?				X
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?				X

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

- a. Substantially impair an adopted emergency response plan or emergency evacuation plan?
- b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?
- c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?
- d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

No Impact

No impacts involving wildfire would occur as a result of the project. The proposed project site is not located in a State Responsibility Area or classified as a Very High Fire Hazard Severity Zone.

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21. Mandatory Findings of Significance

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?		X		
b. Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?			X	
c. Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?		X		

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

Less than Significant Impact with Mitigation Incorporated

Based on the information in Sections E, 4 and E, 5, the project could have potentially significant effects on biological and cultural resources, but these effects would be less than significant with the incorporation of the mitigation measures provided in Sections E, 4, and E, 5.

- b. **Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects).**

Less than Significant Impact

Based on the information in Sections E, 1 – E, 20, the proposed project would not have any impacts that would be individually limited but cumulatively considerable. The impact is less than significant.

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

Less than Significant Impact with Mitigation Incorporated

Based on the information in Sections E, 3, and E, 13, the proposed project could potentially have substantial adverse effects on human beings concerning air quality, greenhouse gas, and noise. However, mitigation measures have been incorporated into the project that would reduce the impacts to less than significant.

F. Mitigation Monitoring and Reporting Program

1. Purpose

Clovis Unified School District has prepared this Mitigation Monitoring and Reporting Program to comply with Section 15097 of the State CEQA Guidelines. The purpose of the Mitigation Monitoring and Reporting Program is to ensure the implementation of the mitigation measures identified in this Initial Study.

2. Lead Agency

Clovis Unified School District will undertake the project and is the Lead Agency for the project. The District is responsible for the implementation of all mitigation measures identified in this Initial Study.

3. Mitigation Monitoring and Reporting Coordinator

The Clovis Unified School District Assistant Superintendent, Facility Services, or designee shall act as the Project Mitigation Reporting Coordinator ("Coordinator").

4. Monitoring and Reporting Procedures for Construction-Related Measures

- a. The Coordinator shall provide a copy of all project design-, site clearing- and construction-related mitigation measures to the project engineer and contractor for incorporation in the project plans, construction specifications, permits, and contracts, as appropriate.
- b. Before the awarding of the bid, the Coordinator shall determine that all project design-, site clearing- and construction-related mitigation measures have been incorporated in the project plans, construction specifications, permits, and contracts, as appropriate.
- c. During construction, the Coordinator, through the construction management team, shall inspect the project area regularly to ensure all work complies with the mitigation measures. If a discrepancy is not resolved within a reasonable time, the Coordinator may order work to cease until the discrepancy is resolved.
- d. Before the District accepts the project improvements, the Coordinator shall certify that the project incorporates all project design and construction-related mitigation measures.

5. Monitoring and Reporting Procedures for Operational Measures

Before the project becomes operational, the Coordinator shall determine that the project's operational plans and procedures incorporate all operations-related mitigation measures.

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G. Names of Individuals Who Prepared the Initial Study

1. Lead Agency

Clovis Unified School District

Denver Stairs
Assistant Superintendent, Facility Services
Clovis Unified School District
1450 Herndon Avenue, Clovis, CA 93611
Phone: (559) 327-9260
Email: denverstairs@cusd.com

Nick Mele
Administrator, Facility Services
Clovis Unified School District
1450 Herndon Avenue, Clovis, CA 93611
Phone: (559) 327-9262
Email: nickmele@cusd.com

2. Environmental Consultants:

Odell Planning & Research, Inc.

49346 Road 426, Suite 2
Oakhurst, CA 93644
Telephone: (559) 472-7167
www.odellplanning.com

Scott B. Odell, AICP, Principal Planner/President
E-mail: scott@odellplanning.com

David K. Young, Senior Project Manager
E-mail: dncyoung2@outlook.com

Nicole Hoke, Senior Planner
E-mail: nicole@odellplanning.com

Ambient Air Quality & Noise Consultants (Air Quality, Energy, Greenhouse Gas Emissions, and Noise)

75 S Higuera Street, Suite 105
San Luis Obispo, CA 93401
(805) 226-2727

ASM Affiliates, Inc. (Cultural Resources and Tribal Cultural Resources)

4800 Stockdale Hwy, Suite 405
Bakersfield, CA 93309
(661) 823-7690

JLB Traffic Engineering, Inc. (Transportation)

516 West Shaw Avenue, Suite 103
Fresno, CA 93704
(559) 570-8991

H. Sources Consulted

Following are the documents and other sources consulted in preparing this Initial Study:

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