



SUPPLEMENTAL

# DRAFT ENVIRONMENTAL IMPACT REPORT

FOR THE

## 2014 CLOVIS GENERAL PLAN CIRCULATION ELEMENT UPDATE

(State Clearinghouse No. 2012061069)

JUNE 29, 2022

*Prepared for:*

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D e N o v o P l a n n i n g G r o u p

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A Land Use Planning, Design, and Environmental Firm





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CIRCULATION ELEMENT UPDATE

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DRAFT EIR

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## PURPOSE

The City of Clovis, as lead agency, determined that the proposed Project is a "project" within the meaning of the California Environmental Quality Act (CEQA), and requires the preparation of a Supplemental Environmental Impact Report (EIR). This Draft Supplemental EIR has been prepared to evaluate the environmental impacts associated with implementation of the project. This EIR is designed to inform decision-makers in the City, other responsible and trustee agencies, and the general public of the potential environmental consequences of approval and implementation of the proposed Project. A detailed description of the proposed project, including the project objectives, and how the Supplemental EIR will be used, is provided in Chapter 2.0 (Project Description).

## AREAS OF CONTROVERSY AND ISSUES TO BE RESOLVED

This Draft Supplemental EIR addresses environmental impacts associated with the proposed Project that are known to the City, raised during the Notice of Preparation (NOP) scoping process, or were raised during preparation of the Draft EIR. This Draft Supplemental EIR is focused on addressing the potentially significant impacts associated with transportation and cumulative impacts. All other environmental topics have been determined to have no change or a less-than-significant impact.

During the NOP process, eight (8) comment letters were received from interested agencies and organizations. The comments are provided in Appendix A. The following are topics of public concern or potential controversy that have become known to the City staff based on public input, known regional issues, and staff observations:

- Adoption of Senate Bill 743 (SB 743) created a need for the City to address Vehicle Miles Traveled (VMT) related impacts for projects that buildout under the General Plan.

## ALTERNATIVES TO THE PROPOSED PROJECT

The CEQA Guidelines require an EIR to describe a reasonable range of alternatives to the project or to the location of the project which would reduce or avoid significant impacts, and which could feasibly accomplish the basic objectives of the proposed project. The alternatives analyzed in this EIR include the following:

### NO PROJECT ALTERNATIVE

This alternative assumes that there would be no focused update to its existing General Plan. There would be no policy changes to the Circulation Element, and the City would not adopt Transportation Impact Analysis (TIA) Guidelines supportive of the Circulation Element. Under this alternative, the City would not be making any policy changes in response to SB 743, but would still be required to analyze projects for VMT. In the absence of defined TIA Guidelines, the City would utilize the Office of Planning and Research (OPR) Guidance for analyzing VMT.

**POLICY CHANGE ONLY ALTERNATIVE**

This alternative assumes that there would be a focused update to its existing General Plan. This would include policy changes to the Circulation Element intended to meet the mandates of State law related to conformance with SB 743. Under this alternative, the City would not adopt Transportation Impact Analysis (TIA) Guidelines supportive of the Circulation Element, but would still be required to analyze projects for VMT. In the absence of defined TIA Guidelines, the City would utilize the OPR Guidance for analyzing VMT.

**TIA GUIDELINES ONLY ALTERNATIVE**

This alternative assumes that there would be no focused update to its existing General Plan. There would be no policy changes to the Circulation Element, but the City would adopt Transportation Impact Analysis Guidelines defining the methodology for analyzing VMT impacts in Clovis. Under this alternative, the City would not be making any policy changes in response to SB 743, but would still be required to analyze projects for VMT.

**ENVIRONMENTALLY SUPERIOR ALTERNATIVE**

A comparative analysis of the proposed General Plan and each of the Project alternatives is provided in Table ES-1 below. The proposed Project is considered the environmentally superior alternative because it provides the greatest potential to be consistent with State law (SB 743), and to establish a consistent approach to VMT analysis, and VMT reduction when compared to the other alternatives. The proposed Project established the City’s policy direction related to these topics, while the other alternatives only partial address VMT reduction, or do not address the topic.

**TABLE ES-1: COMPARISON SUMMARY OF ALTERNATIVES**

<i>ENVIRONMENTAL TOPIC</i>	<i>PROPOSED PROJECT</i>	No Project Alternative	Policy Change Only Alternative	TIA Guidelines Only Alternative
<i>TRANSPORTATION AND CIRCULATION (TC)</i>				
TC Impact 3.1-1	LS	Slightly greater impact	Slightly greater impact	Slightly greater impact
TC Impact 3.1-2	SU	Greater Impact	Slightly Greater Impact	Slightly Greater Impact
TC Impact 3.1-3	LS	Equal Impact	Equal Impact	Equal Impact
Comparison to Proposed Project	Superior	Inferior (4th)	Inferior (2nd)	Inferior (3rd)

## SUMMARY OF IMPACTS AND MITIGATION MEASURES

In accordance with the CEQA Guidelines, this Supplemental EIR focuses on the proposed Project's potentially significant effects on the environment. The CEQA Guidelines defines a significant effect as a substantial adverse change in the physical conditions which exist in the area affected by the proposed project. A less-than-significant effect is one in which there is no long or short-term significant adverse change in environmental conditions. Some impacts are reduced to a less-than-significant level with the implementation of mitigation measures and/or compliance with existing regulations. "Beneficial" effect is not defined in the CEQA Guidelines, but for purposes of this EIR a beneficial effect is one in which an environmental condition is enhanced or improved.

The potential environmental impacts of the proposed Project, the impact level of significance prior to mitigation, the proposed mitigation measures to mitigate an impact, and the impact level of significance after mitigation are summarized in Table ES-2.

**TABLE ES-2: PROJECT IMPACTS AND PROPOSED MITIGATION MEASURES**

ENVIRONMENTAL IMPACT	LEVEL OF SIGNIFICANCE WITHOUT MITIGATION	MITIGATION MEASURE	RESULTING LEVEL OF SIGNIFICANCE
TRANSPORTATION AND CIRCULATION			
Impact 3.1-1: General Plan implementation may conflict with a program, plan, policy or ordinance addressing the circulation system, including transit, bicycle, and pedestrian facilities	NI	N/A	--
Impact 3.1-2: General Plan implementation may result in VMT metrics that are greater than the applicable thresholds (13 percent below Baseline conditions)	PS	<p><b>Mitigation Measure TRANS-1:</b> Implement a Commute Trip Reduction Program: The City shall implement a commute trip program applicable to all or selected employers in the City of Clovis. The criteria for inclusion in the commute trip reduction program are to be determined by the City, and could be based on building size, square footage of retail uses above the amount that qualifies to be screened out as local-serving, number of potential employees and/or other criteria that are appropriate for participation in the program. The program would include the following components that may be applicable for existing land uses and new land use development projects:</p> <ul style="list-style-type: none"> <li>• trip reduction targets</li> <li>• measures to discourage single occupancy vehicles while encouraging alternative modes of transportation such as carpooling, ridesharing, vanpooling, subsidized transit passes and other benefits,</li> <li>• include a guaranteed ride home for eligible employers,</li> <li>• establish applicable fees and funding mechanisms,</li> <li>• define monitoring measures and frequency, and strategies for non-compliance.</li> </ul> <p><b>Mitigation Measure TRANS-2:</b> Support the Implementation of Transportation Management Associations (TMAs) for Focused Areas: The City shall identify focused areas to implement TMAs via public-private partnerships to support the implementation, management and monitoring of transportation demand management (TDM) programs. Transportation Management Associations are non-profit, member-controlled organizations that provide transportation services in a particular area, such as a</p>	SU

CC – cumulatively considerable

PS – potentially significant

LCC – less than cumulatively considerable

SU – significant and unavoidable

LS – less than significant

NI – No Impact

ENVIRONMENTAL IMPACT	LEVEL OF SIGNIFICANCE WITHOUT MITIGATION	MITIGATION MEASURE	RESULTING LEVEL OF SIGNIFICANCE
		<p>commercial district, mall, medical center or industrial park. They generally consist of area businesses with local government support. TMAs provide an institutional framework for TDM programs and services. They are usually more cost effective than programs managed by individual businesses. TMAs allow small employers to provide Commute Trip Reduction services comparable to those offered by large companies. The main goal for TMAs in Clovis would be to maximize the reduction of VMT. Implementation of TMAs may consist of the following:</p> <ul style="list-style-type: none"> <li>• Identify focused areas and Specific Plans that would have the density and mix of land uses compatible with multimodal travel and adoption of TDM, as well as the potential to enter development and funding agreements with the City for TMA support.</li> <li>• Provide seed funding and work with applicants to develop service agreements for the development of TMAs.</li> </ul> <p><b>Mitigation Measure TRANS-3: Provide Bicycle Facilities:</b> The City shall require land uses that generate more than 500 daily trips (which is the threshold that screens small projects from a detailed VMT analysis) to provide bike parking, bike lockers, showers, and personal lockers. This measure is designed to promote commuting by bicycle and support transit first/last mile access. Bicycle facilities shall be required to be constructed in conjunction with each project and funded by the applicant.</p> <p><b>Mitigation Measure TRANS-4: Improve Street Connectivity:</b> The City shall require new area plans and new housing projects to provide a well-connected street network, particularly for non-motorized connections. Increased intersection density, alleyways, and mid-block pedestrian crossings may be a proxy for street connectivity and accessibility to connect a variety of land uses. Characteristics of street network connectivity include short block lengths, numerous three and four-way intersections, and minimal dead-ends (cul-de-sacs). Street connectivity helps to facilitate shorter vehicle trips and greater numbers of walk and bike trips and thus a reduction in VMT.</p>	

CC – cumulatively considerable

PS – potentially significant

LCC – less than cumulatively considerable

SU – significant and unavoidable

LS – less than significant

NI – No Impact

ENVIRONMENTAL IMPACT	LEVEL OF SIGNIFICANCE WITHOUT MITIGATION	MITIGATION MEASURE	RESULTING LEVEL OF SIGNIFICANCE
Impact 3.1-3: General Plan implementation may increase hazards due to a design feature, incompatible uses, or inadequate emergency access	LS	N/A	--
OTHER CEQA-REQUIRED TOPICS			
Impact 4.1: Under Cumulative conditions, General Plan implementation may conflict with a program, plan, policy or ordinance addressing the circulation system, including transit, bicycle, and pedestrian facilities	LS and LCC	N/A	--
Impact 4.2: Under Cumulative conditions, General Plan implementation may result in VMT metrics that are greater than the applicable thresholds (13 percent below Baseline conditions)	PS	<i>Mitigated to the greatest extent feasible through General Plan Policies and Actions. No additional feasible mitigation is available.</i>	SU and CC
Impact 4.3: Under Cumulative conditions, General Plan implementation may increase hazards due to a design feature, incompatible uses, or inadequate emergency access	LS and LCC	N/A	--
Significant Irreversible effects	LS and LCC	N/A	--

CC – cumulatively considerable

PS – potentially significant

LCC – less than cumulatively considerable

SU – significant and unavoidable

LS – less than significant

NI – No Impact

## 1.1 INTRODUCTION

In response to Senate Bill 743 (SB 743), the City of Clovis (City) initiated efforts to establish a framework for analyzing transportation impacts that was both consistent with the State's mandates, and City policy. This effort led to the development of the Interim Transportation Impact Analysis Guidelines (adopted July 20, 2020, Resolution 20-93), which provides guidance to City staff, applicants, and consultants on the requirements to evaluate transportation impacts for projects in the city for the purpose of determining impacts under the California Environmental Quality Act (CEQA).

As the City developed the Interim Transportation Impact Analysis Guidelines in response to the requirements of SB 743, it became evident that the City's 2014 General Plan Circulation Element needed to be updated to be in alignment with the State's mandates, and the Interim Transportation Impact Analysis Guidelines. City staff then embarked on an update to the Circulation Element, which focuses on policy language additions that are aimed at reducing Vehicle Miles Traveled (VMT) by way of a variety of planning mechanisms.

The City ultimately prepared a focused update to its existing 2014 General Plan. The focused update concentrates on policy changes to the Circulation Element only, and does not change any other Element of the 2014 General Plan. The proposed Project is the focused update to the Circulation Element and adoption of the Transportation Impact Analysis Guidelines, which are supportive of the Circulation Element.

## 1.2 PURPOSE OF THE EIR

The City of Clovis, as lead agency, determined that the proposed Project is a "project" within the meaning of CEQA. CEQA requires the preparation of an EIR prior to approving any project that may have a significant impact on the environment. For the purposes of CEQA, the term "project" refers to the whole of an action, which has the potential for resulting in a direct physical change or a reasonably foreseeable indirect physical change in the environment (CEQA Guidelines Section 15378[a]).

This Draft Supplemental EIR has been prepared according to CEQA requirements to evaluate the potential environmental impacts associated with the proposed Project. This Draft Supplemental EIR has been prepared in accordance with CEQA, California Resources Code Section 21000 et seq.; the Guidelines for the California Environmental Quality Act (California Code of Regulations, Title 14, Chapter 3); and the rules, regulations, and procedures for implementing CEQA as adopted by the City of Clovis.

An EIR must disclose the expected direct and indirect environmental impacts associated with a project, including impacts that cannot be avoided, growth-inducing effects, impacts found not to be significant, and significant cumulative impacts, as well as identify mitigation measures and alternatives to the proposed project that could reduce or avoid its adverse environmental impacts.

CEQA requires government agencies to consider and, where feasible, minimize significant environmental impacts of proposed development.

### 1.3 TYPE OF EIR

The State CEQA Guidelines identify several types of EIRs, each applicable to different project circumstances. This EIR has been prepared as a Supplemental EIR (Supplemental EIR) pursuant to CEQA Guidelines Section 15162. Section 15162 states that a SEIR must be prepared for a project if there is a new significant environmental effect or new information of substantial importance that was not known or could not have been known at the time the previous EIR was certified [CEQA Guidelines Sec 15162(c)]. Furthermore, the CEQA Guidelines provide that a SEIR may be prepared if the project has only minor revisions [CEQA Guidelines Sec 15162(c)].

The legal requirements to address vehicle miles traveled under SB 743 are new, and has resulted in the City of Clovis needing to update their Circulation Element and to establish Transportation Impact Analysis Guidelines. The additional analysis required by the EIR is considered “new information of substantial importance that was not known or could not have been known at the time the previous EIR was certified” under [CEQA Guidelines Sec 15162(c)], thus requiring a Supplemental EIR. The addition of new policies and/or refinement of existing policies within the Circulation Element since the General Plan EIR was certified is new information that must be addressed in the Supplemental EIR.

The supplemental-level analysis focuses on the environmental effects from transportation only. An Initial Study was prepared and it was determined that all other environmental topics would have no change, or a less-than-significant impact as a result of the proposed Project. This Supplemental EIR will be used to evaluate subsequent projects and activities under the General Plan as they relate to the environmental topic of transportation. This Supplemental EIR is intended to provide the supplemental information and environmental analysis necessary to assist public agency decision-makers in considering approval of new projects as they relate to the requirements of SB 743.

### 1.4 KNOWN RESPONSIBLE AND TRUSTEE AGENCIES

The term “Responsible Agency” includes all public agencies other than the Lead Agency that have discretionary approval power over the project or an aspect of the project (CEQA Guidelines Section 15381). For the purpose of CEQA, a “Trustee” agency has jurisdiction by law over natural resources that are held in trust for the people of the State of California (CEQA Guidelines Section 15386). While no Responsible Agencies or Trustee Agencies are responsible for approvals associated with adoption of the proposed Project, implementation of future projects within Clovis may require permits and approvals from such agencies, which may include the following:

- California Department of Transportation (Caltrans) coordination regarding regional transportation planning efforts.
- Fresno Council of Governments (Fresno COG) coordination regarding regional transportation planning efforts.

## 1.5 ENVIRONMENTAL REVIEW PROCESS

The review and certification process for the Supplemental EIR has involved, or will involve, the following general procedural steps:

### NOTICE OF PREPARATION AND INITIAL STUDY

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The City of Clovis circulated a Notice of Preparation (NOP) of an EIR for the proposed project on April 4, 2022 to trustee and responsible agencies, the State Clearinghouse, and the public. A scoping meeting was held on April 27, 2022 at the City of Clovis City Hall. No public or agency comments on the NOP related to the EIR analysis were presented or submitted during the scoping meeting. However, during the 30-day public review period for the NOP, which ended on May 4, 2022, eight (8) written comment letters were received on the NOP. A summary of the NOP comments are provided later in this chapter. The NOP and all comments received on the NOP are presented in Appendix A.

### DRAFT SUPPLEMENTAL EIR

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This document constitutes the Draft Supplemental EIR. The Draft Supplemental EIR contains a description of the project, description of the environmental setting, identification of the project's direct and indirect impacts on the environment and mitigation measures for impacts found to be significant, as well as an analysis of project alternatives, identification of significant irreversible environmental changes, growth-inducing impacts, and cumulative impacts. This Draft Supplemental EIR identifies issues determined to have no impact or a less than significant impact, and provides detailed analysis of potentially significant and significant impacts. Comments received in response to the NOP were considered in preparing the analysis in this Supplemental EIR. Upon completion of the Draft Supplemental EIR, the City of Clovis will file the Notice of Completion (NOC) with the State Clearinghouse of the Governor's Office of Planning and Research to begin the public review period.

### PUBLIC NOTICE/PUBLIC REVIEW

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Concurrent with the NOC, the City of Clovis will provide a public notice of availability for the Draft Supplemental EIR, and invite comment from the general public, agencies, organizations, and other interested parties. Consistent with CEQA requirements, the review period for this Draft Supplemental EIR is forty-five (45) days. Public comment on the Draft Supplemental EIR will be accepted in written form. All comments or questions regarding the Draft Supplemental EIR should be addressed to:

Dave Merchen | City Planner  
City of Clovis | Planning Division  
1033 Fifth Street  
Clovis, CA 93612  
559.324.2346  
davidm@cityofclovis.com

## RESPONSE TO COMMENTS/FINAL SUPPLEMENTAL EIR

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Following the public review period, a Final Supplemental EIR will be prepared. The Final Supplemental EIR will respond to both oral and written comments received during the public review period.

## CERTIFICATION OF THE SEIR/PROJECT CONSIDERATION

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The City of Clovis City Council will review and consider the Final Supplemental EIR. If the City finds that the Final Supplemental EIR is "adequate and complete," the City Council may certify the Final Supplemental EIR in accordance with CEQA. As set forth by CEQA Guidelines Section 15151, the standards of adequacy require an EIR to provide a sufficient degree of analysis to allow decisions to be made regarding the proposed project that intelligently take account of environmental consequences.

Upon review and consideration of the Final EIR, the City Council may take action to approve, revise, or deny the project. If the EIR determines that the project would result in significant adverse impacts to the environment that cannot be mitigated to less than significant levels, the City Council would be required to adopt a statement of overriding considerations as well as written findings in accordance with State CEQA Guidelines Sections 15091 and 15093. If additional mitigation measures are required (beyond the General Plan policies and actions that reduce potentially significant impacts, as identified throughout this EIR), a Mitigation Monitoring and Reporting Program (MMRP) would also be adopted in accordance with Public Resources Code Section 21081.6(a) and CEQA Guidelines Section 15097 for mitigation measures that have been incorporated into or imposed upon the project to reduce or avoid significant effects on the environment. The MMRP would be designed to ensure that these measures are carried out during project implementation, in a manner that is consistent with the EIR.

## 1.6 ORGANIZATION AND SCOPE

Sections 15122 through 15132 of the State CEQA Guidelines identify the content requirements for Draft and Final EIRs. An EIR must include a description of the environmental setting, an environmental impact analysis, mitigation measures for any significant impacts, alternatives, significant irreversible environmental changes, growth-inducing impacts, and cumulative impacts. The EIR prepared reviews environmental and planning documentation developed for the project, environmental and planning documentation prepared for recent projects located within the city of Clovis, and responses to the Notice of Preparation (NOP).

This Draft EIR is organized in the following manner:

## EXECUTIVE SUMMARY

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The Executive Summary summarizes the characteristics of the proposed project, known areas of controversy and issues to be resolved, and provides a concise summary matrix of the project's environmental impacts and possible mitigation measures. This chapter identifies alternatives that reduce or avoid at least one significant environmental effect of the proposed project.

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## CHAPTER 1.0 - INTRODUCTION

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Chapter 1.0 briefly describes the proposed project, the purpose of the environmental evaluation, identifies the lead, trustee, and responsible agencies, summarizes the process associated with preparation and certification of an EIR, identifies the scope and organization of the Draft EIR, and summarizes comments received on the NOP.

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## CHAPTER 2.0 - PROJECT DESCRIPTION

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Chapter 2.0 provides a detailed description of the proposed project, including the location, intended objectives, background information, the physical and technical characteristics, including the decisions subject to CEQA, subsequent projects and activities, and a list of related agency action requirements.

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## CHAPTER 3.0 - ENVIRONMENTAL SETTING, IMPACTS AND MITIGATION MEASURES

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Chapter 3.0 contains an analysis of environmental topic areas as identified below. Each subchapter addressing a topical area is organized as follows:

**Environmental Setting.** A description of the existing environment as it pertains to the topical area.

**Regulatory Setting.** A description of the regulatory environment that may be applicable to the project.

**Impacts and Mitigation Measures.** Identification of the thresholds of significance by which impacts are determined, a description of project-related impacts associated with the environmental topic, identification of appropriate mitigation measures, and a conclusion as to the significance of each impact.

The following environmental topics are addressed in this section:

- Transportation and Circulation

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## CHAPTER 4.0 - OTHER CEQA-REQUIRED TOPICS

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Chapter 4.0 evaluates and describes the following CEQA required topics: impacts considered less-than-significant, significant and irreversible impacts, growth-inducing effects, cumulative impacts, and significant and unavoidable environmental effects.

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## CHAPTER 5.0 - ALTERNATIVES

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Chapter 5.0 provides a comparative analysis between the merits of the proposed project and the selected alternatives. State CEQA Guidelines Section 15126.6 requires that an EIR describe a range of reasonable alternatives to the project, which could feasibly attain the basic objectives of the project and avoid and/or lessen any significant environmental effects of the project.

### CHAPTER 6.0 - REPORT PREPARERS

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Chapter 6.0 lists all authors and agencies that assisted in the preparation of the Draft EIR, by name, title, and company or agency affiliation.

### APPENDICES

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This section includes all notices and other procedural documents pertinent to the Draft EIR, as well as technical material prepared to support the analysis.

### 1.7 COMMENTS RECEIVED ON THE NOTICE OF PREPARATION

The City received eight comment letters on the NOP. Copies of this letter is provided in Appendix A of this Draft EIR and the comments are summarized in the Executive Summary chapter. The City received the following comment letters.

- Native American Heritage Commission, Cameron Vela (April 15, 2022)
- California Department of Toxic Substances Control, Gavin McCreary (April 18, 2022)
- Clovis Fire Department, Rick Fultz (May 3, 2022)
- County of Fresno, Kevin Tsuda (May 4, 2022)
- Fresno Metropolitan Flood Control District, Denise Wade (May 4, 2022)
- County of Fresno, Marissa Parker (May 12, 2022)
- California Department of Transportation, David Padilla (May 4, 2022)
- California Department of Fish and Wildlife, Valerie Cook (June 17, 2022)

## 2.1 BACKGROUND AND OVERVIEW

### TRANSPORTATION PLANNING CHANGES

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Senate Bill (SB) 743, passed in 2013, resulted in several statewide California Environmental Quality Act (CEQA) changes. It required the California Governor’s Office of Planning and Research (OPR) to establish new metrics for determining the significance of transportation impacts of projects within transit priority areas (TPAs) and allows OPR to extend use of the metrics beyond TPAs. TPA means “an area within one-half mile of a major transit stop that is existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a transportation improvement program adopted to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations.”

OPR selected Vehicle Miles Traveled (VMT) as the required transportation impact metric and applied their discretion to require its use statewide for determining potential CEQA impacts related to traffic. This legislation also established that aesthetic and parking effects of a residential, mixed-use residential, or employment center projects on an infill site within a TPA are not significant impacts on the environment. The revised CEQA Guidelines that implement this legislation became effective on December 28, 2018, and state that vehicle Level of Service (LOS) and similar measures related to delay shall not be used as the sole basis for determining the significance of transportation impacts for land use projects. As of July 1, 2020, this requirement applied statewide.

The OPR “Technical Advisory on Evaluating Transportation Impacts in CEQA” (December 2018) includes specifications for VMT methodology and recommendations for significance thresholds, screening of project that may be presumed to have less than significant impacts, and mitigation. OPR’s screening criteria includes the following categories: small projects, projects near transit stations, affordable residential development, redevelopment projects, and local serving retail. For each category, OPR provides recommended screening analysis methods and metrics to consider. It is noted that the OPR screening criteria is a recommendation by OPR, and is generally used as guidance from OPR in the absence of specific screening criteria established by a local jurisdiction. The proposed Project, includes the City of Clovis developing their own specific screening criteria, which has similarities to the OPR recommendations, but is specifically tailored to Clovis.

### CITY GUIDELINES AND POLICY CHANGES

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#### **Interim Transportation Impact Analysis Guidelines**

In response to SB 743, the City of Clovis initiated efforts to establish a framework for analyzing transportation impacts that was both consistent with the State’s mandates, and City policy. This effort led to the development of the Interim Transportation Impact Analysis Guidelines (adopted July 20, 2020, Resolution 20-93), which provides guidance to City staff, applicants, and consultants on the requirements to evaluate transportation impacts for projects in the city for the purpose of

## 2.0 PROJECT DESCRIPTION

determining impacts under the California Environmental Quality Act (CEQA). The Interim Transportation Impact Analysis Guidelines are intended to:

- promote conformance with applicable City and State regulations;
- provide evaluation consistent with CEQA;
- ensure consistency in preparation of studies by applicants and consultants; and
- provide predictability in content for City staff and the public in reviewing studies.

The guidelines are intended to be comprehensive, however, not all aspects of every transportation analysis can be addressed within this framework and the City staff reserves the right to use its judgement to request exemptions and/or to modify requirements for specific projects at the time of the review application.

### Project Screening

The Clovis TIA Guidelines provide the following five screening criteria to determine if a project will require a detailed VMT analysis:

1. Small projects
2. Provision of affordable housing
3. Local-serving retail
4. Project located in a High-Quality Transit Area (HQTA)
5. Project located in low VMT area

#### SMALL PROJECTS

Projects that generate or attract fewer than 500 vehicle trips per day are presumed to cause a less-than-significant VMT impact. Projects that typically generate 500 vehicle daily trips are shown in Table 2.0-1.

**TABLE 2.0-1: SAMPLE SMALL PROJECTS (LESS THAN 500 DAILY TRIPS)**

LAND USE TYPE	NUMBER OF UNITS/ SQUARE FEET
Single Family Residential	53 Dwelling Units
Townhome/Attached Residential	68 Dwelling Units
Retail	13,250 SF
Light Industrial	100,800 SF

*NOTE: CALCULATED TRIP RATES FROM THE ITE TRIP GENERATION MANUAL, 10<sup>TH</sup> EDITION.*

#### AFFORDABLE HOUSING

Affordable housing is designated as housing for sale or for rent below market rate. Residential projects in high quality transit areas with a high proportion of affordable housing are presumed to have a less-than-significant transportation impact. Projects can only be screened out if they are located in an area supported by a quality walking and biking network with nearby retail and employment opportunities. If a project contains less than 100 percent affordable housing, the portion that is affordable should be screened out of a detailed VMT analysis.

#### LOCAL-SERVING RETAIL AND PUBLIC FACILITIES

Projects that are local-serving retail with 100,000 square feet gross floor area or less are presumed to have a less-than-significant impact. This applies to the entirety of a retail project; for a mixed-use project, this screening criteria should be applied to the retail/commercial component separately to determine if that portion of the project screens out of a detailed VMT analysis.

The determination of local-serving retail is based on location, the characteristics of the project and the vicinity of the site, as well as the envisioned goods and services the retail development would provide. Generally, local-serving retail primarily provides goods and services that most people need on a regular basis and be located close to where people live. Groceries, medicines, fast food and casual restaurants, fitness and beauty services are typical goods and services provided by local-serving retail centers.

The City may require that a project applicant provide a market analysis to demonstrate that the project meets the characteristics of a local-serving retail development based on the goods and services provided relative to the geographic location, the customer base, and other nearby retail uses.

Public services (e.g., police, fire stations, public utilities, neighborhood parks<sup>1</sup>) do not generally generate substantial amounts of trips and VMT. Instead, these land uses are often built to support other nearby land uses (e.g., office and residential). Therefore, these land uses can be presumed to have less-than-significant impacts on VMT. However, this presumption would not apply if the project is sited in a location that requires employees or visitors to travel substantial distances and may require a detailed VMT analysis.

#### HIGH-QUALITY TRANSIT AREA (HQTA)

Projects that are located in a high-quality transit area would not require a detailed VMT analysis. However, this presumption does not apply if the project:

- has a floor area ratio (FAR) of less than 0.75;
- includes substantially more parking for use by residents, customers, or employees of the project than required by the City (per Section 9.32.040 of the Municipal Code) such that it discourages use of alternative modes (transit, biking, walking) by promoting auto ownership and making driving very convenient;
- is inconsistent with the applicable Fresno Council of Governments (Fresno COG) Sustainable Communities Strategy (SCS), as determined by the City; or
- replaces affordable residential units with a smaller number of moderate- or high-income residential units.

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<sup>1</sup> For the purpose of conducting VMT analyses, neighborhood parks are defined as typically including playground equipment, playfields, and picnic facilities; ranging in size of up to 30 acres; and serving as social and recreational focal points for neighborhoods.

A map of the existing High-Quality Transit Areas in the city is provided in Attachment A of the TIA Guidelines.

#### TRANSPORTATION ANALYSIS ZONES (TAZ)

A TAZ is the unit of geography most commonly used in conventional transportation planning models. The size of a zone varies, but an area of around 3,000 people is not uncommon. The spatial extent of zones typically varies in models, ranging from very large areas in suburbs to as small as city blocks or buildings in central business districts. Zones are constructed by census block information. Typically, these blocks are used in transportation models by providing socio-economic data. Most often the critical information is the number of automobiles per household, household income, and employment within these zones. This information helps to further the understanding of trips that are produced and attracted within the zone.

#### PROJECT LOCATED IN LOW VMT AREAS

Residential and employment projects that are proposed in areas that generate VMT below adopted City thresholds are presumed to have a less-than-significant VMT impact and thus can be screened out. The City provides screening maps based on TAZs and results from the Fresno Council of Governments (COG) travel model. The following types of projects may be screened out of detailed VMT analysis using these criteria:

- Residential projects proposed in TAZs with total daily resident-based VMT per capita that is 13 percent less than the existing average baseline level for Fresno County
- Office or the employment portions of other non-residential uses with total daily employee-based VMT per employee that is 13 percent less than the existing average baseline level for Fresno County

The TAZs that fall into these categories are shown in green in the maps provided in Attachment B of the City's TIA Guidelines.

#### CONSISTENCY WITH RTP/SCS

If a proposed project is inconsistent with the adopted Fresno COG Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), the City will evaluate whether that inconsistency may result in a significant impact on transportation. Therefore, projects that are inconsistent with the RTP/SCS would not qualify for screening out of a detailed VMT analysis.

### **Circulation Element Update**

The Clovis City Council adopted the Clovis General Plan on August 25, 2014. Included in the General Plan is the Circulation Element, which determines the transportation system necessary to accommodate the planned land use and development. The Circulation Element identifies the general location and extent of existing and proposed major transportation facilities, including major thoroughfares, transportation routes, terminals, and other local public utilities and facilities. The goals and policies in this element are closely correlated with the Land Use Element and are

intended to provide a balance between the City's future growth and land use development, roadway size, traffic service levels, and community character.

As the City of Clovis developed the Interim TIA Guidelines in response to the requirements of SB 743, it became evident that the City's Circulation Element needed to be updated to be in alignment with the State's mandates, and the Interim TIA Guidelines. City staff then embarked on an update to the Circulation Element, which focuses on policy language additions that are aimed at reducing VMT by way of a variety of planning mechanisms.

## 2.2 PROJECT OBJECTIVES

The following objectives were established for the proposed Project:

- Update City Policy in the Circulation Element to meet the mandates of State law related to conformance with SB 743.
- Establish Transportation Impact Analysis Guidelines to meet the requirements of State law.
- Updates to City Policy and Guidelines should not obstruct and prevent the City from growing in accordance with the City's existing plans for growth.

## 2.3 DESCRIPTION OF PROPOSED PROJECT

### FOCUSED UPDATE

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The City of Clovis is preparing a focused update to its existing General Plan. The proposed Project concentrates on policy changes to the Circulation Element only, and does not change any other Element of the General Plan. The proposed Project also includes adoption of the Transportation Impact Analysis Guidelines, which are supportive of the Circulation Element.

The focused General Plan Update does not affect land uses or development patterns, and does not result in any physical development. The key components of the focused General Plan Update include revisions to the goals and policies in the Circulation Element. The following presents the proposed changes in a track change form.

### GOALS AND POLICIES

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#### **Clovis General Plan**

The City of Clovis adopted a comprehensive General Plan Update on August 28, 2014. Since then, statewide transportation planning requirements have driven the need to amend the Circulation Element portion of the adopted General Plan. As such, the City of Clovis is preparing a focused update to its existing General Plan that concentrates on policy changes to the Circulation Element only, and does not change any other Element of the General Plan. The following presents the proposed changes in a track change form for ease of identifying the proposed text changes.

## 2.0 PROJECT DESCRIPTION

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### CLOVIS GENERAL PLAN GOALS AND POLICIES

**OVERARCHING GOAL:** A comprehensive and well-maintained multimodal circulation system that provides for the safe and efficient movement of people and goods, as well as encourages reductions in Vehicle Miles Traveled (VMT) through well-planned pedestrian connections and improved connectivity.

**Goal 1: A context-sensitive and “complete streets” transportation network that prioritizes effective connectivity and accommodates a comprehensive range of mobility needs.**

Policy 1.1 **Multimodal network.** The city shall plan, design, operate, and maintain the transportation network to promote safe and convenient travel for all users: pedestrians, bicyclists, transit riders, freight, and motorists.

Policy 1.2 **Transportation decisions.** Decisions should balance the comfort, convenience, and safety of pedestrians, bicyclists, and motorists.

Policy 1.3 **Age and mobility.** The design of roadways shall consider all potential users, including children, seniors, and persons with disabilities.

Policy 1.4 **Jobs and housing.** Encourage infill development that would provide jobs and services closer to housing, and vice versa, to reduce citywide vehicle miles traveled and effectively utilize the existing transportation infrastructure, as well as promote carpooling whenever possible.

Policy 1.5 **Neighborhood connectivity.** The transportation network shall provide multimodal access between neighborhoods and neighborhood-serving uses (educational, recreational, or neighborhood commercial uses).

Policy 1.6 **Internal circulation.** New development shall utilize a grid or modified-grid street pattern. Areas designated for residential and mixed-use village developments should feature short block lengths of 200 to 600 feet.

Policy 1.7 **Narrow streets.** The City may permit curb-to-curb dimensions that are narrower than current standards on local streets to promote pedestrian and bicycle connectivity and enhance safety.

Policy 1.8 **Network completion.** New development shall complete the extension of stub streets planned to connect to adjacent streets, where appropriate.

**Goal 2: A roadway network that is well planned, funded, and maintained.**

Policy 2.1 **Level of service.** The following is the City’s level of service (LOS) standards:

1. Achieve LOS D vehicle traffic operations during the a.m. and p.m. peak hours
2. Allow exceptions on a case-by-case basis where lower levels of service would result in other public benefits, such as:
  - Preserving agriculture or open space land

- Preserving the rural/historic character of a neighborhood
  - Preserving or creating a pedestrian-friendly environment in Old Town or mixed-use village districts
  - Avoiding adverse impacts to pedestrians, cyclists, and mass transit riders
1. \_\_\_\_\_ where right-of-way constraints would make capacity expansion infeasible
- Policy 2.2 **Multimodal LOS.** Monitor the evolution of multimodal level of service (MMLOS) standards. The city may adopt MMLOS standards when appropriate.
- Policy 2.3 **Fair share costs.** New development shall pay its fair share of the cost for circulation improvements in accordance with the city's traffic fee mitigation program.
- Policy 2.4 **Right-of-way dedication.** The city may require right-of-way dedication essential to the circulation system in conjunction with any development or annexation. The City shall request the County of Fresno to apply the same requirements in the Clovis planning area.
- Policy 2.5 **Regional and state roadway funding.** Coordinate with the County of Fresno, City of Fresno, Fresno Council of Governments, and Caltrans to fund roadway improvements adjacent to and within the City's Planning Area.
- Policy 2.6 **Vehicle Miles Traveled.** Development projects shall comply with the City's VMT Transportation Analysis Guidelines and provide the appropriate VMT mitigation measures as determined through the analysis.
- Policy 2.7 **VMT Mitigation Fee Program.** Evaluate the feasibility of a VMT mitigation fee program and explore opportunities for establishing an in-lieu mitigation fee to offset VMT impacts from development.
- Policy 2.8 **Partner with local agencies and stakeholders.** Partner with other local and regional agencies and stakeholders to explore VMT mitigation measures at the regional scale.

**Goal 3: A multimodal transportation network that is safe and comfortable in the context of adjacent neighborhoods.**

- Policy 3.1 **Traffic calming.** Employ traffic-calming measures in new developments and existing neighborhoods to control traffic speeds and maintain safety.
- Policy 3.2 **Neighborhood compatibility.** Periodically review and update design standards to ensure that new and redesigned streets are compatible with the context of adjacent neighborhoods.
- Policy 3.3 **Old Town and mixed use village centers.** Transportation decisions on local streets in Old Town and mixed-use village centers shall prioritize pedestrians, then bicyclists, then mass transit, then motorists.

## 2.0 PROJECT DESCRIPTION

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- Policy 3.4 **Road diets.** Minimize roadway width as feasible to serve adjacent neighborhoods while maintaining sufficient space for public safety services.
- Policy 3.5 **Roadway widening.** Only consider street widening or intersection expansions after considering multimodal alternative improvements to non-automotive facilities.
- Policy 3.6 **Soundwalls.** Design roadway networks to disperse traffic to minimize traffic levels. Discourage soundwalls along new collector and local streets when feasible.
- Policy 3.7 **Conflict points.** Minimize the number of and enhance safety at vehicular, pedestrian, and bicycle conflict points.
- Policy 3.8 **Access management.** Minimize access points and curb cuts along arterials and prohibit them within 200 feet of an intersection where possible. Eliminate and/or consolidate driveways when new development occurs or when traffic operation or safety warrants.
- Policy 3.9 **Park-once.** Encourage “park-once” designs where convenient, centralized public parking areas are accompanied by safe, visible, and well-marked access to sidewalks and businesses.
- Policy 3.10 **Pedestrian access and circulation.** Entrances at signalized intersections should provide sidewalks on both sides of the entrance that connect to an internal pedestrian pathway to businesses and throughout nonresidential parking lots larger than 50 spaces.
- Policy 3.11 **Right-of-way design.** Design landscaped parkways, medians, and right-of-ways as aesthetic buffers to improve the community’s appearance and encourage non-motorized transportation.
- Policy 3.12 **Residential orientation.** Where feasible, residential development should face local and collector streets to increase visibility and safety of travelers along the streets, and encourage pedestrian and bicycle access.

**Goal 4: A well-planned and maintained pedestrian circulation network that promotes increased use of the City’s bicycle, and transit, and pedestrian-system facilities in order to reduce that serves as a functional alternative to commuting by single-occupancy vehicles whenever possible car.**

- Policy 4.1 **Bike and transit backbone.** The bicycle and transit system should connect Shaw Avenue, Old Town, the Medical Center/R&T Park, and the three Urban Centers.
- Policy 4.2 **Priority for new bicycle facilities.** Prioritize investments in the backbone system over other bicycle improvements.

- Policy 4.3 **Freeway crossings.** Require separate bicycle and pedestrian crossings for new freeway extensions and encourage separate crossings where Class I facilities are planned to cross existing freeways.
- Policy 4.4 **Bicycles and transit.** Coordinate with transit agencies to integrate bicycle access and storage into transit vehicles, bus stops, and activity centers.
- Policy 4.5 **Transit stops.** Improve and maintain safe, clean, comfortable, well-lit, and rider-friendly transit stops that are well marked and visible to motorists.
- Policy 4.6 **Transit priority corridors.** Prioritize investments for, and transit services and facilities along the transit priority corridors.
- Policy 4.7 **Bus rapid transit.** Plan for bus rapid transit and transit-only lanes on transit priority corridors as future ridership levels increase.

**Goal 5: A complete system of trails and pathways accessible to all residents focusing on connectivity between adjacent neighborhoods, parks, trails, and goods and services.**

- Policy 5.1 **Complete street amenities.** Upgrade existing streets and design new streets to include complete street amenities, prioritizing improvements to bicycle and pedestrian connectivity or safety, consistent with the Bicycle Transportation Master Plan and other master plans.
- Policy 5.2 **Development-funded facilities.** Require development to fund and construct facilities as shown in the [Active Transportation Plan Bicycle Transportation Plan](#) when facilities are in or adjacent to the development.
- Policy 5.3 **Pathways.** Encourage pathways and other pedestrian amenities in Urban Centers and new development 10 acres or larger.
- Policy 5.4 **Homeowner associations.** The city may require homeowner associations to maintain pathways and other bicycle and pedestrian facilities within the homeowner association area.
- Policy 5.5 **Pedestrian access.** Require sidewalks, paths, and crosswalks to provide access to schools, parks, and other activity centers and to provide general pedestrian connectivity throughout the city.

**Goal 6: Safe and efficient goods movement with minimal impacts on local roads and neighborhoods.**

- Policy 6.1 **Truck routes.** Plan and designate truck routes that minimize truck traffic through or near residential areas.
- Policy 6.2 **Land use.** Place industrial and warehousing businesses near freeways and truck routes to minimize truck traffic through or near residential areas.

**Goal 7: A regional transportation system that connects Clovis to the San Joaquin Valley region.**

- Policy 7.1 **Clovis Avenue extension.** Invest in the extension of Clovis Avenue north to Copper Avenue as funding is available.
- Policy 7.2 **Right-of-way for future extensions.** Coordinate with Fresno County, the Fresno Council of Governments, and Caltrans to preserve future right-of-way for extending Clovis Avenue north of Copper Avenue to Auberry Road and future State Route 65.
- Policy 7.3 **San Joaquin River crossing.** Collaborate with the Fresno Council of Governments and appropriate agencies to secure a San Joaquin River crossing between State Route 41 and North Fork Road.

**Goal 8: Improve and enhance the circulation network in a manner that reduces VMT through improved connectivity by focusing on modes of transportation that promotes the reduction in the use of single-occupancy vehicles whenever possible.**

- Policy 8.1 **Transportation Demand Management.** Develop Transportation Demand Management (TDM) measures that promote, enhance, and make available feasible alternative modes of transportation to residents, employees, and visitors.
- Policy 8.2 **Transit Routes.** As development occurs in the City's growth areas, continue to evaluate transit routes to determine the most efficient methods of transporting people between residential neighborhoods and goods and services.
- Policy 8.3 **Bicycle Lanes.** Seek input from and/or partner with any local bicycle advocacy groups to improve the design, location, and functionality of bicycle lanes to encourage safe and efficient travel lanes.
- Policy 8.4 **Connectivity between residential and commercial.** Continue to explore opportunities for increased non-vehicular connectivity between new and existing residential development and commercial uses.
- Policy 8.5 **Community outreach and education.** Explore the feasibility of a community outreach and education program that promotes and highlights opportunities for safe and efficient non-vehicular modes of transportation for commuting and recreation.
- Policy 8.6 **Employer commute programs.** Work with businesses to encourage commuter programs and infrastructure that promotes alternative modes of transportation reducing the use of single-occupancy vehicles, such as additional bicycle racks/lockers, on-site shower facilities, and perks for employees who commute.

## 2.6 USES OF THE EIR AND REQUIRED AGENCY APPROVALS

This Supplemental EIR may be used for the following direct and indirect approvals and permits associated with adoption and implementation of the proposed Project.

### CITY OF CLOVIS

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The City of Clovis is the lead agency for the proposed Project. The proposed focused General Plan Update will be presented to the Planning Commission for review and recommendation and to the City Council for comment, review, and consideration for adoption. The City Council has the sole discretionary authority to approve and adopt the proposed focused General Plan Update. In order to approve the proposed Project, the City Council would consider the following actions:

- Certification of the General Plan Supplemental EIR;
- Adoption of required CEQA findings and Statement of Overriding Considerations for the above action;
- Adoption of a Mitigation Monitoring and Reporting Program; and
- Approval of the focused General Plan Update.

### SUBSEQUENT USE OF THE EIR

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This EIR provides a review of environmental effects associated with implementation of the proposed focused General Plan Update, which amends the adopted Clovis General Plan. When considering approval of subsequent activities under the Clovis General Plan, the focused changes to the Circulation Element must be considered. As such, the City of Clovis would utilize this Supplemental EIR, in addition to the existing certified General Plan EIR, as the basis in determining potential environmental effects and the appropriate level of environmental review, if any, of a subsequent activity. Projects or activities successive to this Supplemental EIR, would be proposed under the adopted General Plan and may include, but are not limited to, the following:

- Approval and funding of major projects and capital improvements;
- Future Specific Plan, Planned Unit Development, or Master Plan approvals;
- Annexations;
- Revisions to the Clovis Zoning Ordinance;
- Development plan approvals, such as tentative subdivision maps, variances, conditional use permits, and other land use permits;
- Development Agreements;
- Property rezoning consistent with the General Plan;
- Permit issuances and other approvals necessary for public and private development projects; and
- Issuance of permits and other approvals necessary for implementation of the General Plan.

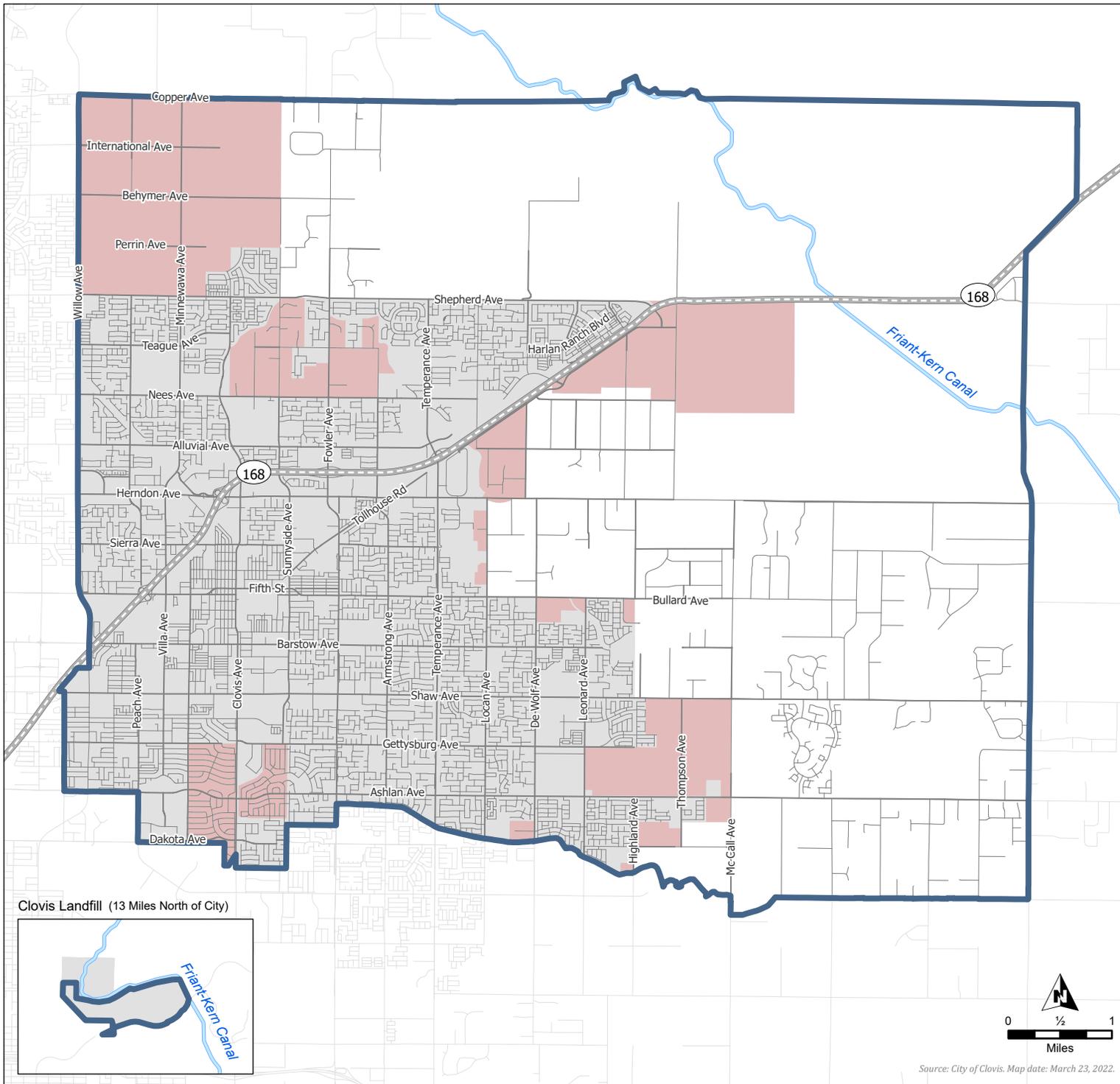
### OTHER GOVERNMENTAL AGENCY APPROVALS

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City approval of the proposed Project would not require any actions or approvals by other public agencies. However, because of the long-range planning nature of the proposed Project, the City would need to coordinate with other long range planning efforts by other agency that operate regionally. These include, but are not necessarily limited to:

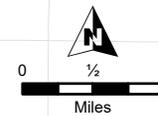
- California Department of Transportation (Caltrans) coordination regarding regional transportation planning efforts.
- Fresno Council of Governments (Fresno COG) coordination regarding regional transportation planning efforts.

**Figure 2.0-1  
Clovis Planning Area**



**LEGEND**

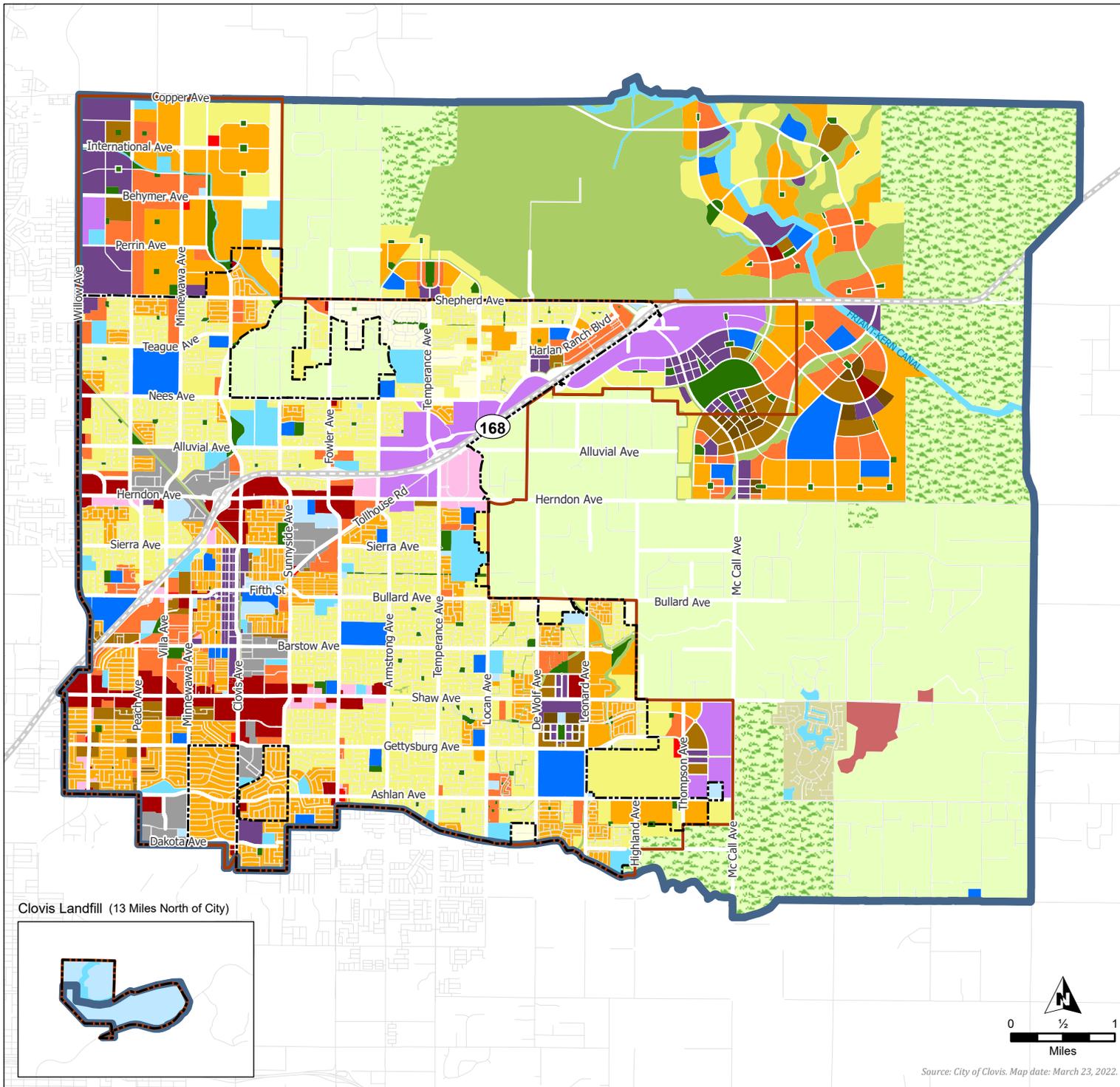
- Clovis City Limits
- Clovis Sphere of Influence
- Planning Area Boundary



Source: City of Clovis. Map date: March 23, 2022.

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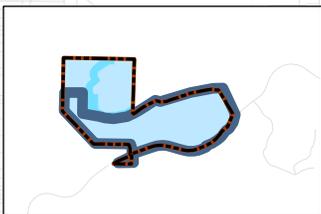
**Figure 2.0-2  
Land Use Diagram**



**LEGEND**

- Clovis City Limits
- Sphere of Influence
- Planning Area Boundary
- State Hwy 168
- AG: Agriculture (1 DU/20 Ac)
- RR: Rural Residential
- VL: Very Low Density Residential (0.6-2.0 DU/Ac)
- L: Low Density Residential (2.1-4.0 DU/Ac)
- M: Medium Density Residential (4.1-7.0 DU/Ac)
- MH: Medium High Density Residential (7.1-15.0 DU/Ac)
- H: High Density Residential (15.1-25.0 DU/Ac)
- VH: Very High Density Residential (25.1-43.0 DU/Ac)
- MU-V: Mixed Use Village
- MU-BC: Mixed Use Business Campus
- O: Office
- I: Industrial
- NC: Neighborhood Commercial
- GC: General Commercial
- OS: Open Space
- P: Public/Quasi-Public Facilities
- PK: Park
- S: School
- W: Water
- C-SP: Special Commercial
- PRC-FC: Planned Rural Community

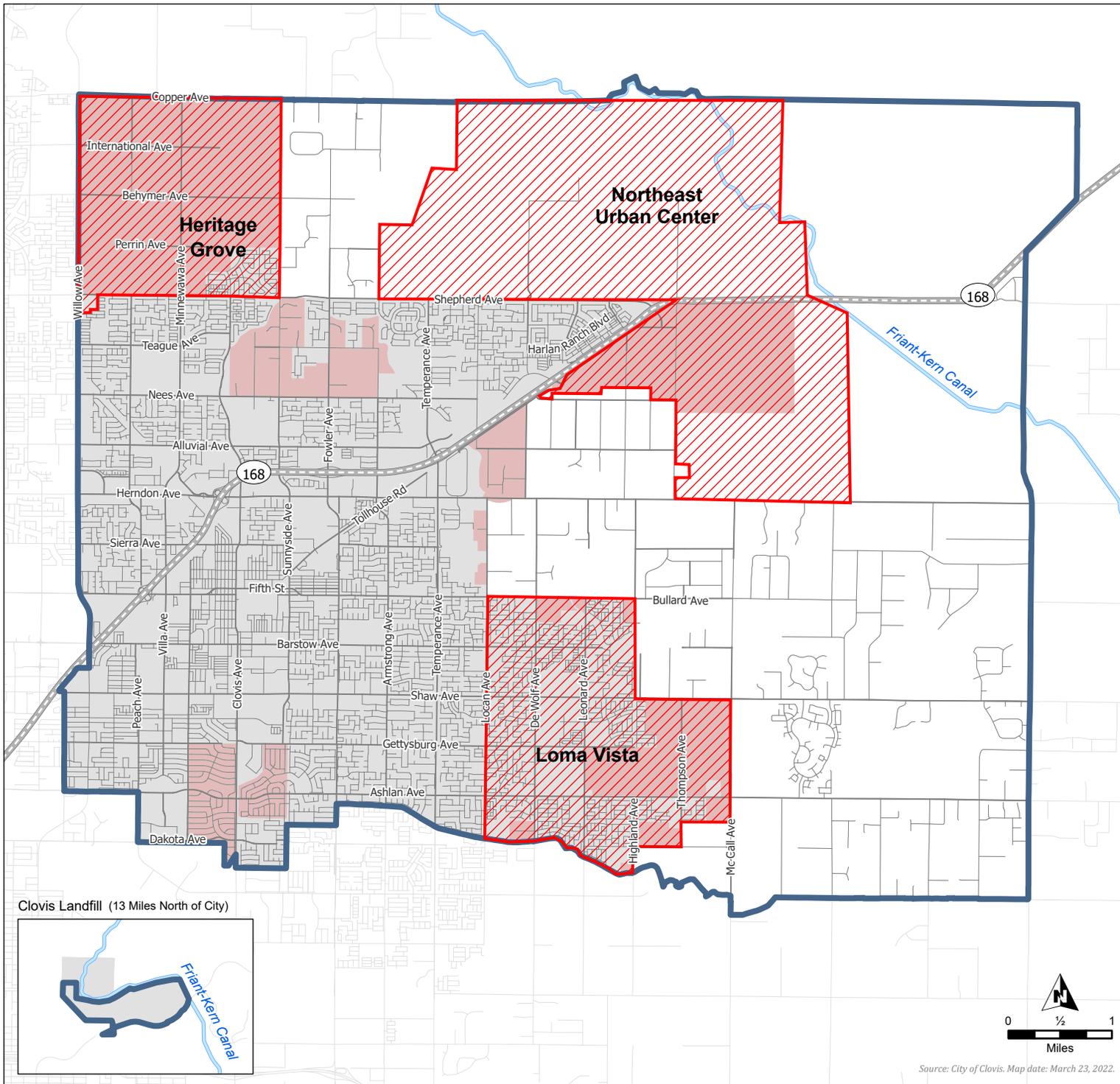
Clovis Landfill (13 Miles North of City)



Source: City of Clovis. Map date: March 23, 2022.

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**Figure 2.0-3  
Urban Centers**



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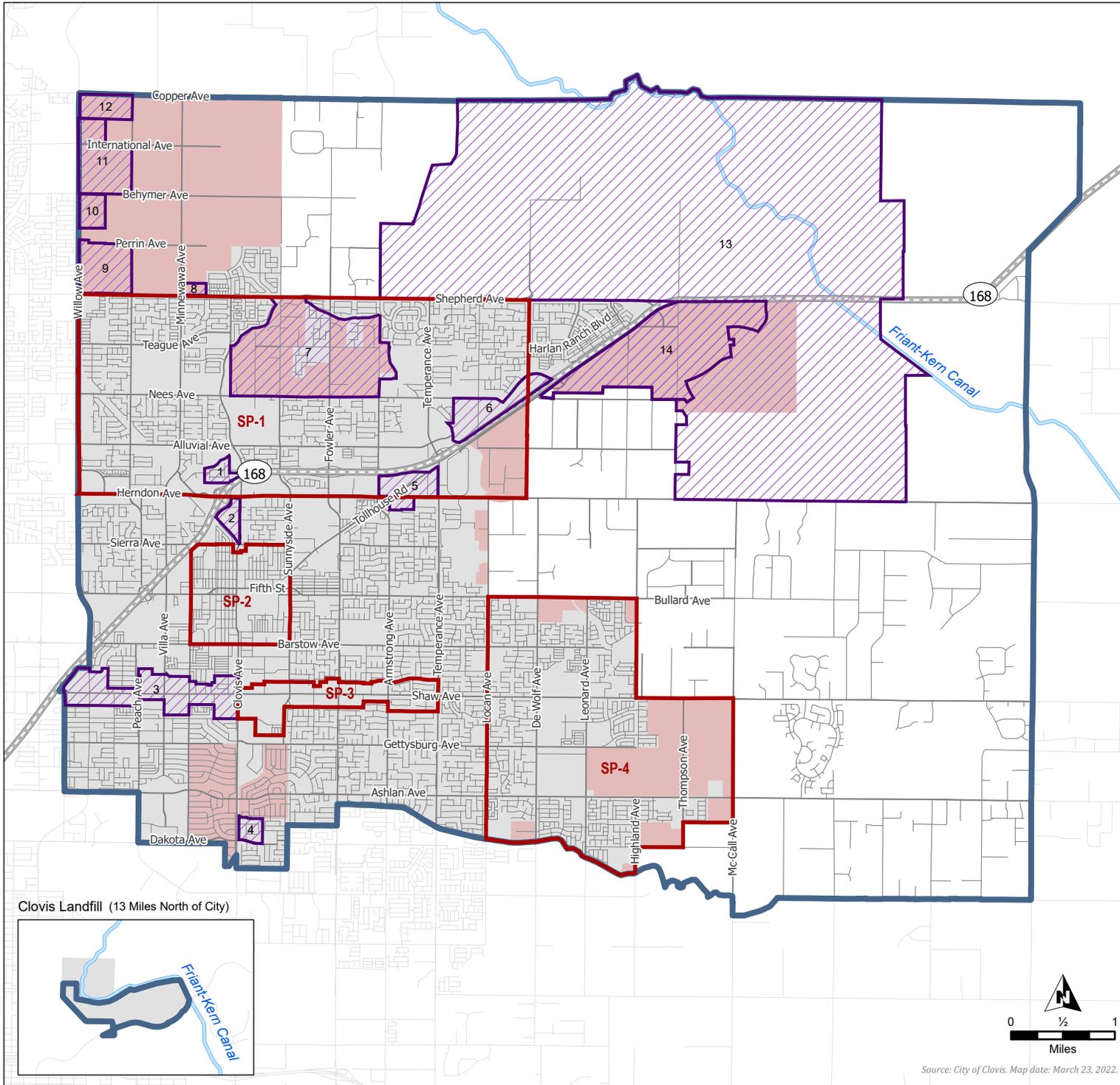
- Urban Centers
- Clovis City Limits
- Clovis Sphere of Influence
- Planning Area Boundary

Clovis Landfill (13 Miles North of City)

Source: City of Clovis. Map date: March 23, 2022.

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Figure 2.0-4  
Focus Areas



LEGEND

- Specific Plan Areas
- Focus Areas
- Clovis City Limits
- Clovis Sphere of Influence
- Planning Area Boundary



Source: City of Clovis. Map date: March 23, 2022.

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This chapter describes the potential impacts to the transportation system associated with the General Plan Circulation Element Update. As previously discussed in Section 2.0, Project Description, the project would (1) update City Policy in the Circulation Element to meet the mandates of State law related to conformance with Senate Bill 743 (SB 743), (2) establish Transportation Impact Analysis Guidelines to meet the requirements of State law, and (3) ensure that updated City Policy and Guidelines should not obstruct and prevent the City from growing in accordance with the City's existing plans for growth.

The impact analysis examines how proposed updates to City's policies would impact the transportation system under the California Environmental Quality Act (CEQA). To provide context for the impact analysis, this chapter begins with a discussion of the environmental setting, which is a description of the existing transportation system relative to CEQA criteria. Following the setting is the regulatory framework influencing the transportation system and providing the basis for impact significance thresholds used in the impact analysis. The chapter concludes with the impact analysis findings and recommended mitigation measures.

### 3.1.1 ENVIRONMENTAL SETTING

This section provides a contextual background to the City's existing transportation system relative to the relevant CEQA criteria. The proposed Project would not directly affect the physical transportation systems in the City of Clovis. Therefore, the environmental setting does not include the components of the physical transportation system.

#### **Vehicle Miles Traveled**

Vehicle miles traveled (VMT) is determined by multiplying the number of vehicular trips by the trip distance in miles. For example, one vehicle that travels ten miles in a day generates 10 VMT. For the purposes of this Supplemental Environmental Impact Report (SEIR), VMT is expressed on a daily basis for a typical weekday. VMT values in this analysis represent the full length of a given trip and are not truncated at jurisdiction boundaries. Additionally, these VMT values are for trips beginning or ending in the City (i.e., are associated with land uses within Clovis and its SOI). Trips passing through the City and SOI without stopping are not included in these VMT estimates, as the City has little or no control over such trips.

Although the absolute amount of VMT may be reported, transportation impact analysis is typically based on VMT expressed as an efficiency metric. VMT efficiency metrics, such as VMT per resident and VMT per employee, allow the VMT performance of different land use quantities to be compared. Such metrics provide a measure of travel efficiency and help depict whether people are traveling by vehicle more or less over time, across different areas, or across different planning scenarios. A per-capita or per-employee decline in VMT compared to a baseline condition indicates that the land use patterns and transportation network are operating more efficiently.

## 3.1 TRANSPORTATION AND CIRCULATION

Two measures of VMT are used in this analysis:

1. **VMT per capita for residential land uses.** Includes VMT for all trips produced by a dwelling unit's residents, such as to work, school, or shop, on a typical weekday.
2. **VMT per employee for non-residential land uses.** Includes all trips made by employees at the non-residential land use on a typical weekday, not including visitors to the non-residential land use such as customers, patients or deliveries.

The regional activity-based travel demand model maintained by the Fresno Council of Governments (Fresno COG) is used to identify the VMT generated by land uses in Clovis as well as the entire county. The Fresno COG model also includes estimates of VMT for trips traveling to and from land uses within Fresno County but with one end of the trip outside Fresno County, such as a trip between Clovis and Bakersfield. These "external" trips are estimated to account for approximately 25 percent of VMT generated by residents of Fresno County and nearly 50 percent of VMT generated by employees in Fresno County.

VMT estimates for the 2019 baseline modelled conditions are shown in Table 3.1-1. In addition to the two metrics presented above, total VMT metrics are reported for information.

**TABLE 3.1-1: DEMOGRAPHICS AND VMT, 2019 BASELINE CONDITIONS**

<i>UNITS</i>	<i>FRESNO COUNTY</i>	<i>CLOVIS</i>
<b>VMT PER CAPITA</b>		
Population	1,010,400	134,100
Residential VMT	16,267,400	2,159,000
VMT per Capita	16.1	16.1
<b>VMT PER EMPLOYEE</b>		
Employees	404,100	36,500
Employee VMT	10,345,340	897,900
VMT per Employee	25.6	24.6
<b>TOTAL VMT</b>		
Total VMT	25,693,300	2,687,400

SOURCES: FRESNO COG, KITTELSON & ASSOCIATES, 2022

### 3.1.2 REGULATORY SETTING

The General Plan, along with a variety of City, regional, State, and Federal plans, legislation, and policy directives provide guidelines for the safe operation of streets and transportation facilities in Clovis. While the City has primary responsibility for the maintenance and operation of local transportation facilities in its jurisdiction, Clovis staff works on a continual basis with responsible regional, State, and Federal agencies including County of Fresno, the Fresno Council of Governments, the California Department of Transportation (Caltrans), the Federal Highway Administration, and others to maintain, improve, and balance the competing transportation needs of the community and the region.

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## FEDERAL

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### **Federal Highway Administration**

The Federal Highway Administration (FHWA) is the agency of the United States (US) Department of Transportation (DOT) responsible for the federally funded roadway system, including the interstate highway network and portions of the primary state highway network, such as State Route 168 (SR-168) and State Route 41 (SR-41).

### **Federal Transit Administration**

The Federal Transit Administration (FTA) is an authority that provides financial and technical assistance to local public transit systems, including buses, subways, light rail, commuter rail, trolleys, and ferries. The FTA is funded by Title 49 of the United States Code, which states the FTA's interest in fostering the development and revitalization of public transportation systems.

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## STATE

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### **Assembly Bill 32, Senate Bill 32, and Senate Bill 375**

Assembly Bill (AB) 32, also known as the Global Warming Solutions Act of 2006, committed California to reducing greenhouse gas (GHG) emissions to 1990 levels by 2020. In 2016, Senate Bill (SB) 32 added a new target: reducing statewide emissions to 40 percent below 1990 levels by 2030.

SB 375 provides guidance for curbing emissions from cars and light trucks to help California comply with AB 32. There are five major components to SB 375:

1. ARB will guide the adoption of GHG emission targets to be met by each Metropolitan Planning Organization (MPO) in the state. The MPO for Clovis is the Fresno Council of Governments (Fresno COG).
2. MPOs are required to create a Sustainable Communities Strategy (SCS) that provides a plan for meeting these regional targets. The SCS must be consistent with the Regional Transportation Plan (RTP).
3. Regional housing elements and transportation plans must be synchronized on eight-year schedules. Also, the SCS and Regional Housing Needs Assessment (RHNA) must be consistent with each other.
4. CEQA is streamlined for preferred development types such as mixed-use projects and transit-oriented developments (TODs) if they meet specific requirements.
5. MPOs must use transportation and air emission modeling methodologies consistent with California Transportation Commission (CTC) guidelines.

### **Assembly Bill 417**

In October 2013, AB 417 created a statutory CEQA exemption for bicycle plans in urbanized areas. Before the passage of this bill, cities and counties that prepared bicycle plans were required to carry out a CEQA review. AB 417 exempts the following types of bicycle projects in an urbanized area:

1. Restriping of streets and highways

## 3.1 TRANSPORTATION AND CIRCULATION

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2. Bicycle parking and storage
3. Signal timing to improve intersection operations
4. Signage for bicycles, pedestrians, and vehicles

However, not all bicycle plans are exempt if certain conditions are met (e.g., a new Class I bicycle trail through a sensitive natural area).

### **Assembly Bill 1358**

The California Complete Streets Act requires general plans updated after January 30, 2011, to include Complete Streets policies so that roadways are designed to safely accommodate all users, including bicyclists, pedestrians, transit riders, children, the elderly, and persons with disabilities, as well as motorists. From 2011 onward, any local jurisdiction—county or city—that undertakes a substantive update of the circulation element of its general plan must consider “complete streets” and incorporate corresponding policies and programs. “Complete streets” comprises a suite of policies and street design guidelines which provide for the needs of all road users, including pedestrians, bicyclists, transit operators and riders, children, the elderly, and the disabled.

### **Senate Bill 743**

SB 743, passed in 2013, resulted in several statewide CEQA changes. It required the California Governor’s Office of Planning and Research (OPR) to establish new metrics for determining the significance of transportation impacts of projects within transit priority areas (TPAs) and allows OPR to extend use of the metrics beyond TPAs. OPR selected VMT as the preferred transportation impact metric and applied their discretion to require its use statewide. This legislation also established that aesthetic and parking effects of a residential, mixed-use residential, or employment center projects on an infill site within a TPA are not significant impacts on the environment. The revised CEQA Guidelines that implement this legislation became effective on December 28, 2018, and state that vehicle level of service (LOS) and similar measures related to vehicle delay shall not be used as the sole basis for determining the significance of transportation impacts for land use projects, and that as of July 1, 2020, this requirement shall apply statewide.

The OPR “Technical Advisory on Evaluating Transportation Impacts in CEQA” (December 2018) includes specifications for VMT methodology and recommendations for significance thresholds, screening of projects that may be presumed to have less than significant impacts, and mitigation.

Screening criteria include:

- **Small projects:** The Technical Advisory concludes that, absent any information to the contrary, projects that generate 110 trips per day or less may be assumed to cause a less-than-significant transportation impact.
- **Projects near transit stations:** Projects located within ½ mile of an “existing major transit stop” or an “existing stop along a high-quality transit corridor” would have a less-than-significant impact on VMT.
- **Affordable residential development:** Projects consisting of a high percentage of affordable housing may be assumed to cause a less-than-significant transportation impact on VMT

because they may improve jobs-housing balance and/or otherwise generate less VMT than market-based units.

- **Redevelopment projects:** If a proposed redevelopment project leads to a net overall decrease in VMT (when compared against the VMT of the existing land uses), the project would lead to a less-than-significant transportation impact.
- **Local-serving retail:** Trip lengths may be shortened and VMT reduced by adding “local-serving” retail opportunities that improve retail destination proximity. Page 17 of the Technical Advisory generally describes retail development including stores less than 50,000 square feet as local-serving. In May 2020, OPR staff indicated during online webinars that any retail building that is 50,000 square feet or less may be considered local-serving.

Other key guidance includes:

1. VMT is the most appropriate metric to evaluate a project’s transportation impact.
2. OPR recommends tour- and trip-based travel models to estimate VMT, but ultimately defers to local agencies to determine the appropriate tools.
3. OPR recommends measuring VMT for residential and office projects on a “per rate” basis. Specifically, OPR recommends VMT per capita for residential projects and VMT per employee for office projects.
4. OPR recommends that a per capita or per employee VMT that is fifteen percent below that of existing development may be a reasonable threshold (page 10). In other words, an office project that generates VMT per employee that is more than 85 percent of the regional VMT per employee could result in a significant impact. OPR notes that this threshold is supported by evidence that connects this level of reduction to the State’s emissions goals (pages 10-11).
5. For retail projects, OPR recommends measuring the net decrease or increase in VMT in the planning area with and without the project. The recommended impact threshold is any increase in total VMT.
6. Lead agencies ultimately have the discretion to set or apply their own significance thresholds, provided they are based on significant evidence.
7. Cities and counties still have the ability to use measures of delay such as LOS for other plans, studies, or network monitoring. However, according to CEQA section 15064.3, Determining the Significance of Transportation Impacts, “effect on automobile delay shall not constitute a significant environmental impact.”

### **California Air Resources Board Scoping Plan-Identified VMT Reductions and Relationship to State Climate Goals**

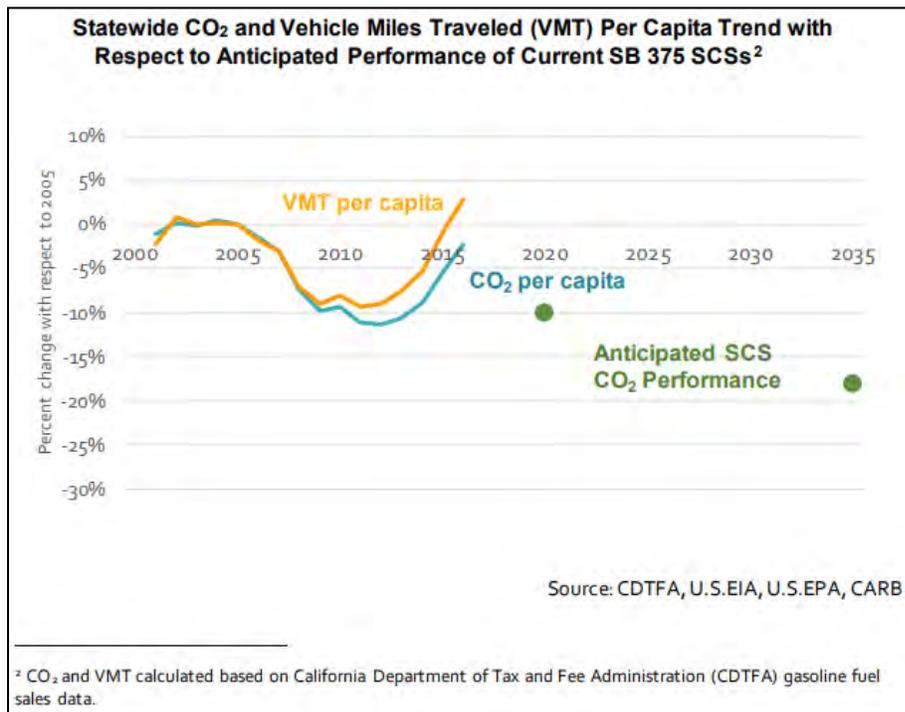
ARB has specific guidance for VMT thresholds in the ARB 2017 “Scoping Plan-Identified VMT Reductions and Relationship to State Climate Goals” (January 2019). This document provides recommendations for VMT reduction thresholds that would be necessary to achieve the state’s GHG reduction goals and acknowledges that the SCS targets alone are not sufficient to meet climate goals. ARB concluded that a 14.3-percent reduction in total VMT per capita and a 16.8 percent reduction in light-duty truck VMT per capita (over current conditions; 2015-2018) was needed to

## 3.1 TRANSPORTATION AND CIRCULATION

meet these goals. Additionally, the OPR “Technical Advisory” cites this document as support for the 15-percent reduction threshold.

### California Air Resources Board 2018 Progress Report, California’s Sustainable Communities and Climate Protection Act, California Air Resources Board

In the “2018 Progress Report, California’s Sustainable Communities and Climate Protection Act” (November 2018), ARB charts recent VMT per capita trends and shows VMT per capita increasing in recent years. This trend is inconsistent with RTP/SCS projections across the state forecasting declines.



SOURCE: 2018 PROGRESS REPORT CALIFORNIA’S SUSTAINABLE COMMUNITIES AND CLIMATE PROTECTION ACT, CALIFORNIA AIR RESOURCES BOARD, 2018

### Caltrans Vehicle Miles Traveled-Focused Transportation Impact Study Guide

The Caltrans “Vehicle Miles Traveled-Focused Transportation Impact Study Guide” (TISG), dated May 20, 2020, was prepared to provide guidance to Caltrans districts, lead agencies, tribal governments, developers, and consultants regarding Caltrans’ review of VMT impact analysis for land use projects and land use plans. Caltrans seeks to reduce single occupancy vehicle trips, provide a safe transportation system, reduce per capita VMT, increase accessibility to destinations via cycling, walking, carpooling, and transit, and reduce greenhouse gas (GHG) emissions. The TISG notes that, for land use projects and plans, automobile delay is no longer considered a significant impact on the environment under CEQA. Caltrans’ primary review focus for a land use project’s transportation impacts is now VMT. The TISG generally endorses the OPR “Technical Advisory,”

including the thresholds in that document. Caltrans may review VMT thresholds, methodology, and mitigations.

### **Caltrans Interim Land Development and Intergovernmental Review (LDIGR) Safety Review Practitioners Guidance**

The Interim LDIGR Safety Review Practitioners Guidance (July 2020) was developed to provide immediate direction about the safety review while final guidance is being developed. This interim guidance does not establish thresholds of significance for determining safety impacts under CEQA. The guidance notes that the significance of impacts should be determined with careful judgment on the part of a public agency and based, to the greatest extent possible, on scientific and factual data consistent with Caltrans' CEQA guidance contained in Caltrans' Standard Environmental Reference. The guidance notes that District traffic safety staff will use available data to determine if the proposed project may influence or contribute to locations identified by traffic safety Investigations generated by network screening or initiated by the district.

### **Caltrans Deputy Directive 64-R1: Complete Streets – Integrating the Transportation System and Assembly Bill 1358: Complete Streets Act of 2008**

In 2001, Caltrans adopted Deputy Directive (DD) 64, a policy directive related to non-motorized travel throughout the state. In October 2008, DD 64 was strengthened to reflect changing priorities and challenges. DD 64-R1 states:

*The Department views all transportation improvements as opportunities to improve safety, access, and mobility for all travelers in California and recognizes bicycle, pedestrian, and transit modes as integral elements of the transportation system.*

*The Department develops integrated multimodal projects in balance with community goals, plans, and values. Addressing the safety and mobility needs of bicyclists, pedestrians, and transit users in all projects, regardless of funding, is implicit in these objectives. Bicycle, pedestrian, and transit travel is facilitated by creating "complete streets" beginning early in system planning and continuing through project delivery and maintenance and operations. Developing a network of "complete streets" requires collaboration among all Department functional units and stakeholders to establish effective partnerships.*

Providing safe mobility for all users, including motorists, bicyclists, pedestrians, and transit riders, contributes to the Department's vision: "Improving Mobility Across California."

Successful long-term implementation of this policy is intended to result in more options for people to go from one place to another, less traffic congestion and greenhouse gas emissions, more walkable communities (with healthier, more active people), and fewer barriers for older adults, children, and people with disabilities.

Economically, complete streets can help revitalize communities, and they can give families the option to lower transportation costs by using transit, walking, or bicycling rather than driving to reach their destinations. The Department is actively engaged in implementing its complete streets

policy in all planning, programming, design, construction, operations, and maintenance activities and products on the State Highway System.

In 2008, the State of California enacted Assembly Bill 1358, the Complete Streets Act of 2008. This law requires cities and counties, when updating their general plans, to ensure that local streets and roads meet the needs of all users, including bicyclists, pedestrians, transit riders, children, seniors, persons with disabilities and motorists. The law took effect in January 2011, when the OPR issued new proposed General Plan guidelines that reflect Complete Streets planning principles. As described by OPR, complete streets should be designed and constructed to serve all users of streets, roads, and highways, regardless of their age or ability, or whether they are driving, walking, bicycling, or taking transit.

### **Caltrans Director’s Policy 22 (DP-22), Director’s Policy on Context Sensitive Solutions**

Director’s Policy 22, a policy regarding the use of “Context Sensitive Solutions” on all state highways, was adopted by Caltrans in November of 2001. The policy reads:

*The Department uses “Context Sensitive Solutions” as an approach to plan, design, construct, maintain, and operate its transportation system. These solutions use innovative and inclusive approaches that integrate and balance community, aesthetic, historic, and environmental values with transportation safety, maintenance, and performance goals. Context sensitive solutions are reached through a collaborative, interdisciplinary approach involving all stakeholders.*

*The context of all projects and activities is a key factor in reaching decisions. It is considered for all State transportation and support facilities when defining, developing, and evaluating options. When considering the context, issues such as funding feasibility, maintenance feasibility, traffic demand, impact on alternate routes, impact on safety, and relevant laws, rules, and regulations must be addressed.*

The policy recognizes that “in towns and cities across California, the State highway may be the only through street or may function as a local street,” that “these communities desire that their main street be an economic, social, and cultural asset as well as provide for the safe and efficient movement of people and goods,” and that “communities want transportation projects to provide opportunities for enhanced non-motorized travel and visual quality.” The policy acknowledges that addressing these needs will assure that transportation solutions meet more than just traffic and operational objectives.

### **OPR General Plan Guidelines**

The Governor’s Office of Planning and Research (OPR) publishes General Plan Guidelines as for cities and counties developing their general plans. OPR released its updated guidelines in 2017, which includes legislative changes, new guidance, policy recommendations, external links to resource documents, and additional resources. For each general plan element, the guidelines discuss statutory requirements in detail, provide recommended policy language, and include examples of city and county general plans that have adopted similar policies.

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**REGIONAL**

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**Fresno Council of Governments Regional Transportation Plan and Sustainable Community Strategy**

The Fresno County Council of Governments (Fresno COG) is a voluntary association of local governments and a regional planning agency comprised of 16 member jurisdictions, including the City of Clovis. The Fresno COG's purpose is to establish a consensus on the needs of the Fresno County area and further action plans for issues related to the Fresno County region. The current Regional Transportation Plan and Sustainable Community Strategy (RTP/SCS) produced by Fresno COG was adopted in 2018, and a 2022 RTP/SCS is in the process of being adopted. The RTP/SCS sets forth regional transportation policy and provides capital program planning for all regional, state, and federally funded projects. The RTP addresses GHG emissions reductions and other air emissions related to transportation, with the goal of preparing for future growth in a sustainable way. The plan specifies how funding will be sourced and financed for the region's planned transportation investments, ongoing operations, and maintenance.

**Fresno County Transportation Authority and Measure C.**

The Fresno County Transportation Authority (FCTA) is a regional agency that was created to administer the voter-passed Measure C program in 1986. Measure C was a 20-year program that achieved a half-cent sales tax for transportation expenditures and infrastructure. After its 20-year duration, the program was extended for another 20 years in 2006 and named the Measure C Extension Expenditure Plan. Through this funding, the FCTA established goals and core values for utilizing these funds for not only building roads but also completion of added bike lanes; expansion of Fresno and Clovis transit; and support for transit, ridesharing, and vanpools.

**Fresno County Congestion Management Process**

As the designated Congestion Management Agency (CMA) for Fresno County, Fresno COG is responsible for updating County's Congestion Management Process (CMP) and monitoring its implementation. The Fresno County CMP identifies four general objectives: (1) optimize the transportation facilities through efficient system management; (2) invest in strategies that reduce travel demand, improve system performance, increase safety, and provide effective incident management; (3) reduce VMT by encouraging alternative modes of transportation and promotion of sustainable land use development; and (4) improve public transit, extend bicycle and pedestrian systems, and promote car-sharing and bike-sharing programs to facilitate the development of an integrated multi-modal transportation system in the Fresno region.

**San Joaquin Valley Air Pollution Control District (SJVAPCD)**

SJVAPCD has implemented Rule 9410, Employer Based Trip Reduction. The purpose of this rule is to reduce VMT from private vehicles used by employees to commute to and from their worksites to reduce emissions of NO<sub>x</sub>, ROG, and particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>). The rule applies to employers with at least 100 employees. Employers are required to implement an Employer Trip Reduction Implementation Plan (ETRIP) for each worksite with 100 or more eligible employees to meet applicable targets specified in the rule. Employers are required to facilitate the participation of the development of ETRIPs by providing information to its employees explaining the requirements

## 3.1 TRANSPORTATION AND CIRCULATION

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and applicability of this rule. Employers are required to prepare and submit an ETRIP for each worksite to the District. The ETRIP must be updated annually. Under this rule, employers shall collect information on the modes of transportation used for each eligible employee's commutes both to and from work for every day of the commute verification period, as defined in using either the mandatory commute verification method or a representative survey method. Annual reporting includes the results of the commute verification for the previous calendar year along with the measures implemented as outlined in the ETRIP and, if necessary, any updates to the ETRIP.

### LOCAL

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#### Clovis General Plan

The City of Clovis adopted a comprehensive General Plan Update on August 28, 2014. Since then, statewide transportation planning requirements have driven the need to amend the Circulation Element portion of the adopted General Plan. As such, the City of Clovis is preparing a focused update to its existing General Plan that concentrates on policy changes to the Circulation Element only, and does not change any other Element of the General Plan. The following presents the proposed changes in a track change form.

#### CLOVIS GENERAL PLAN GOALS AND POLICIES

**OVERARCHING GOAL:** A comprehensive and well-maintained multimodal circulation system that provides for the safe and efficient movement of people and goods, as well as encourages reductions in Vehicle Miles Traveled (VMT) through well-planned pedestrian connections and improved connectivity.

**Goal 1:** A context-sensitive and “complete streets” transportation network that prioritizes effective connectivity and accommodates a comprehensive range of mobility needs.

- Policy 1.1 **Multimodal network.** The city shall plan, design, operate, and maintain the transportation network to promote safe and convenient travel for all users: pedestrians, bicyclists, transit riders, freight, and motorists.
- Policy 1.2 **Transportation decisions.** Decisions should balance the comfort, convenience, and safety of pedestrians, bicyclists, and motorists.
- Policy 1.3 **Age and mobility.** The design of roadways shall consider all potential users, including children, seniors, and persons with disabilities.
- Policy 1.4 **Jobs and housing.** Encourage infill development that would provide jobs and services closer to housing, and vice versa, to reduce citywide vehicle miles travelled and effectively utilize the existing transportation infrastructure, as well as promote carpooling whenever possible.
- Policy 1.5 **Neighborhood connectivity.** The transportation network shall provide multimodal access between neighborhoods and neighborhood-serving uses (educational, recreational, or neighborhood commercial uses).

Policy 1.6 **Internal circulation.** New development shall utilize a grid or modified-grid street pattern. Areas designated for residential and mixed-use village developments should feature short block lengths of 200 to 600 feet.

Policy 1.7 **Narrow streets.** The City may permit curb-to-curb dimensions that are narrower than current standards on local streets to promote pedestrian and bicycle connectivity and enhance safety.

Policy 1.8 **Network completion.** New development shall complete the extension of stub streets planned to connect to adjacent streets, where appropriate.

**Goal 2: A roadway network that is well planned, funded, and maintained.**

Policy 2.1 **Level of service.** The following is the City's level of service (LOS) standards:

1. Achieve LOS D vehicle traffic operations during the a.m. and p.m. peak hours
2. Allow exceptions on a case-by-case basis where lower levels of service would result in other public benefits, such as:
  - Preserving agriculture or open space land
  - Preserving the rural/historic character of a neighborhood
  - Preserving or creating a pedestrian-friendly environment in Old Town or mixed-use village districts
  - Avoiding adverse impacts to pedestrians, cyclists, and mass transit riders where right-of-way constraints would make capacity expansion infeasible

Policy 2.2 **Multimodal LOS.** Monitor the evolution of multimodal level of service (MMLOS) standards. The city may adopt MMLOS standards when appropriate.

Policy 2.3 **Fair share costs.** New development shall pay its fair share of the cost for circulation improvements in accordance with the city's traffic fee mitigation program.

Policy 2.4 **Right-of-way dedication.** The city may require right-of-way dedication essential to the circulation system in conjunction with any development or annexation. The City shall request the County of Fresno to apply the same requirements in the Clovis planning area.

Policy 2.5 **Regional and state roadway funding.** Coordinate with the County of Fresno, City of Fresno, Fresno Council of Governments, and Caltrans to fund roadway improvements adjacent to and within the City's Planning Area.

Policy 2.6 **Vehicle Miles Traveled.** Development projects shall comply with the City's VMT Transportation Analysis Guidelines and provide the appropriate VMT mitigation measures as determined through the analysis.

Policy 2.7 **VMT Mitigation Fee Program.** Evaluate the feasibility of a VMT mitigation fee program and explore opportunities for establishing an in-lieu mitigation fee to offset VMT impacts from development.

[Policy 2.8 Partner with local agencies and stakeholders. Partner with other local and regional agencies and stakeholders to explore VMT mitigation measures at the regional scale.](#)

**Goal 3: A multimodal transportation network that is safe and comfortable in the context of adjacent neighborhoods.**

- Policy 3.1 **Traffic calming.** Employ traffic-calming measures in new developments and existing neighborhoods to control traffic speeds and maintain safety.
- Policy 3.2 **Neighborhood compatibility.** Periodically review and update design standards to ensure that new and redesigned streets are compatible with the context of adjacent neighborhoods.
- Policy 3.3 **Old Town and mixed use village centers.** Transportation decisions on local streets in Old Town and mixed-use village centers shall prioritize pedestrians, then bicyclists, then mass transit, then motorists.
- Policy 3.4 **Road diets.** Minimize roadway width as feasible to serve adjacent neighborhoods while maintaining sufficient space for public safety services.
- Policy 3.5 **Roadway widening.** Only consider street widening or intersection expansions after considering multimodal alternative improvements to non-automotive facilities.
- Policy 3.6 **Soundwalls.** Design roadway networks to disperse traffic to minimize traffic levels. Discourage soundwalls along new collector and local streets when feasible.
- Policy 3.7 **Conflict points.** Minimize the number of and enhance safety at vehicular, pedestrian, and bicycle conflict points.
- Policy 3.8 **Access management.** Minimize access points and curb cuts along arterials and prohibit them within 200 feet of an intersection where possible. Eliminate and/or consolidate driveways when new development occurs or when traffic operation or safety warrants.
- Policy 3.9 **Park-once.** Encourage “park-once” designs where convenient, centralized public parking areas are accompanied by safe, visible, and well-marked access to sidewalks and businesses.
- Policy 3.10 **Pedestrian access and circulation.** Entrances at signalized intersections should provide sidewalks on both sides of the entrance that connect to an internal pedestrian pathway to businesses and throughout nonresidential parking lots larger than 50 spaces.
- Policy 3.11 **Right-of-way design.** Design landscaped parkways, medians, and right-of-ways as aesthetic buffers to improve the community’s appearance and encourage non-motorized transportation.

Policy 3.12 **Residential orientation.** Where feasible, residential development should face local and collector streets to increase visibility and safety of travelers along the streets, and encourage pedestrian and bicycle access.

**Goal 4: A well-planned and maintained pedestrian circulation network that promotes increased use of the City's bicycle, and transit, and pedestrian-system-facilities in order to reduce that serves as a functional alternative to commuting by single-occupancy vehicles whenever possible car.**

- Policy 4.1 **Bike and transit backbone.** The bicycle and transit system should connect Shaw Avenue, Old Town, the Medical Center/R&T Park, and the three Urban Centers.
- Policy 4.2 **Priority for new bicycle facilities.** Prioritize investments in the backbone system over other bicycle improvements.
- Policy 4.3 **Freeway crossings.** Require separate bicycle and pedestrian crossings for new freeway extensions and encourage separate crossings where Class I facilities are planned to cross existing freeways.
- Policy 4.4 **Bicycles and transit.** Coordinate with transit agencies to integrate bicycle access and storage into transit vehicles, bus stops, and activity centers.
- Policy 4.5 **Transit stops.** Improve and maintain safe, clean, comfortable, well-lit, and rider-friendly transit stops that are well marked and visible to motorists.
- Policy 4.6 **Transit priority corridors.** Prioritize investments for, and transit services and facilities along the transit priority corridors.
- Policy 4.7 **Bus rapid transit.** Plan for bus rapid transit and transit-only lanes on transit priority corridors as future ridership levels increase.

**Goal 5: A complete system of trails and pathways accessible to all residents focusing on connectivity between adjacent neighborhoods, parks, trails, and goods and services.**

- Policy 5.1 **Complete street amenities.** Upgrade existing streets and design new streets to include complete street amenities, prioritizing improvements to bicycle and pedestrian connectivity or safety, consistent with the Bicycle Transportation Master Plan and other master plans.
- Policy 5.2 **Development-funded facilities.** Require development to fund and construct facilities as shown in the Active Transportation Plan ~~Bicycle Transportation Plan~~ when facilities are in or adjacent to the development.
- Policy 5.3 **Pathways.** Encourage pathways and other pedestrian amenities in Urban Centers and new development 10 acres or larger.

## 3.1 TRANSPORTATION AND CIRCULATION

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Policy 5.4 **Homeowner associations.** The city may require homeowner associations to maintain pathways and other bicycle and pedestrian facilities within the homeowner association area.

Policy 5.5 **Pedestrian access.** Require sidewalks, paths, and crosswalks to provide access to schools, parks, and other activity centers and to provide general pedestrian connectivity throughout the city.

### **Goal 6: Safe and efficient goods movement with minimal impacts on local roads and neighborhoods.**

Policy 6.1 **Truck routes.** Plan and designate truck routes that minimize truck traffic through or near residential areas.

Policy 6.2 **Land use.** Place industrial and warehousing businesses near freeways and truck routes to minimize truck traffic through or near residential areas.

### **Goal 7: A regional transportation system that connects Clovis to the San Joaquin Valley region.**

Policy 7.1 **Clovis Avenue extension.** Invest in the extension of Clovis Avenue north to Copper Avenue as funding is available.

Policy 7.2 **Right-of-way for future extensions.** Coordinate with Fresno County, the Fresno Council of Governments, and Caltrans to preserve future right-of-way for extending Clovis Avenue north of Copper Avenue to Auberry Road and future State Route 65.

Policy 7.3 **San Joaquin River crossing.** Collaborate with the Fresno Council of Governments and appropriate agencies to secure a San Joaquin River crossing between State Route 41 and North Fork Road.

### **Goal 8: Improve and enhance the circulation network in a manner that reduces VMT through improved connectivity by focusing on modes of transportation that promotes the reduction in the use of single-occupancy vehicles whenever possible.**

Policy 8.1 **Transportation Demand Management.** Develop Transportation Demand Management (TDM) measures that promote, enhance, and make available feasible alternative modes of transportation to residents, employees, and visitors.

Policy 8.2 **Transit Routes.** As development occurs in the City's growth areas, continue to evaluate transit routes to determine the most efficient methods of transporting people between residential neighborhoods and goods and services.

Policy 8.3 **Bicycle Lanes.** Seek input from and/or partner with any local bicycle advocacy groups to improve the design, location, and functionality of bicycle lanes to encourage safe and efficient travel lanes.

Policy 8.4 **Connectivity between residential and commercial.** Continue to explore opportunities for increased non-vehicular connectivity between new and existing residential development and commercial uses.

Policy 8.5 **Community outreach and education.** Explore the feasibility of a community outreach and education program that promotes and highlights opportunities for safe and efficient non-vehicular modes of transportation for commuting and recreation.

Policy 8.6 **Employer commute programs.** Work with businesses to encourage commuter programs and infrastructure that promotes alternative modes of transportation reducing the use of single-occupancy vehicles, such as additional bicycle racks/lockers, on-site shower facilities, and perks for employees who commute.

### **Transportation Impact Analysis Guidelines**

The City of Clovis adopted guidelines for transportation impact analysis in July 2020. The Transportation Impact Analysis (TIA) Guidelines document<sup>1</sup> provides guidance to City of Clovis staff, applicants, and consultants on the requirements to evaluate transportation impacts for projects in the city for the purpose of determining impacts under CEQA. It provides guidance for the two types of analysis that normally comprise a TIA report (1) CEQA Analysis, and (2) Local Transportation Analysis.

For the CEQA VMT analysis, the TIA guidelines define the quantitative methodology, significance thresholds, and mitigation measures for conducting the transportation analysis in accordance with the requirements of SB 743 primarily based on VMT metrics. For land development projects, VMT per capita or VMT per employee are used to determine impacts. The guidelines document defines specific methodologies, criteria and thresholds for several project types, and discusses potential mitigation measures that can be considered to reduce VMT.

### **Clovis Active Transportation Plan**

The 2022 Active Transportation Plan (ATP) defines a clear vision for the city's active transportation network and proposes a framework for implementing projects, programs, and policies to turn the vision into a reality. The ATP identifies strategies to improve safety and accessibility for active forms of travel such as walking and bicycling. It supplements other long-range plans and will help the City create a sustainable and multi-modal transportation network.

The plan includes the following goals.

1. Improve the safety of people walking and bicycling.
2. Develop a well-connected network of trails, walkways, and bikeways.

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<sup>1</sup> City of Clovis, "Interim Transportation Impact Analysis Guidelines," July, 2020.

## 3.1 TRANSPORTATION AND CIRCULATION

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3. Create a network that allows people of all socioeconomic circumstances the ability to travel safely throughout the city without a car.
4. Increase access to recreation by providing access to trails, walkways, and bikeways.
5. Increase the share of people who walk or ride a bicycle to get to work, school, shopping, and other activities

The ATP includes a list of project recommendations with specific locations, facility types and priority for implementation to improve walking and bicycling infrastructure throughout Clovis.

### **Fresno-Clovis Metropolitan Area Transit Short Range Transit Plan (SRTP)**

The Fresno-Clovis Metropolitan Area (FCMA) SRTP was adopted on June 24, 2021. It presents a bi-annual short-term operational, financial, and capital improvements for two transit providers: Fresno Area Express (FAX) and Clovis Transit. The purpose of the SRTP is to promote a comprehensive, coordinated, and continuous planning process for transit service in the FCMA over the planning horizon.

### 3.1.3 IMPACTS AND MITIGATION MEASURES

#### METHODS OF ANALYSIS

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The SEIR focuses on the potentially significant environmental effects that may result from updates to the Circulation Element, including those future projects developed under the Circulation Element. This SEIR also focuses on the new information that was not available at the time that the certified General Plan EIR was prepared. The potential impacts were identified based on a set of significance criteria consistent with the CEQA Guidelines. Because SB 743 eliminated the use of LOS for CEQA impact analysis purposes, it is not included in this chapter. The EIR for the General Plan certified in 2014 included a comprehensive evaluation of the transportation system related to roadway capacity and LOS. This chapter provides an analysis of potential transportation impacts under current CEQA criteria.

#### **Travel Demand Model**

Forecasts of regional travel by various modes, regional average VMT per capita and VMT per employee values are determined using the Fresno COG regional travel model. The travel demand model is a set of mathematical procedures and equations that represent the variety of transportation choices that people make, and how those choices result in trips on the transportation network.

The Fresno COG regional travel model is an activity-based model that simulates the County's population, based on detailed Census data, and models the daily activity patterns of each simulated individual along with resulting travel demand. The daily activity patterns in the travel model are based on a statistical analysis of a household travel survey, where a representative sample of households were asked to track all daily activities and trips by all members of their household. A simulated travel tour might consist of, for example, travel from the home to the gym to work to supermarket to home in a typical weekday. The travel model was calibrated to these surveyed travel patterns, and also validated by its ability to replicate counted traffic volumes, transit ridership, and

total Fresno County VMT from the Highway Performance Measurement System (HPMS) which is based on traffic counts.

The model presumes that future background travel options and behaviors remain similar to current conditions and does not explicitly account for potential changes associated with disruptive trends, emerging technologies, and changes in travel preferences. The model also does not assume a significant increase in working at home compared to 2019 baseline conditions.

#### LAND USE

The Fresno travel model requires land uses to be defined for each geographic area in the county. The model defines land uses in micro-analysis zones (MAZs) which represent subareas of neighborhoods similar to Census blocks. The model also aggregates land uses to the more traditional transportation analysis zones (TAZs) which are typically bounded by major arterial or collector streets and are generally closer to the scale of Census tracts. The model land use inputs include numbers of households and employees by employment category, as well as enrollment at schools.

Fresno COG had defined a 2042 land use forecast for the RTP/SCS based on regional economic forecasts. This forecast was generally consistent with the allowable land uses in the Clovis General Plan, but assumes that little or no development would occur in a number of Clovis SOI areas by 2042. In order to more completely assess the transportation impacts of the current General Plan, a revised future forecast was prepared for this SEIR.

The future land use forecasts are consistent with the current General Plan land use map, as are the Fresno COG 2042 RTP/SCS forecasts. The project team worked with City staff to confirm more specific assumptions for areas designated for Specific Plans and/or mixed-use development. A detailed mapping of parcels and allowable development was compiled to determine the maximum buildout potential of each parcel and planning area. The assumed development densities were then adjusted to provide a “most likely” scenario for General Plan development. The assumed development densities were set at typical suburban development densities except for Specific Plan areas designated for higher density development, in which case assumed average densities were approximately double the typical suburban values.

Table 3.1-2 summarizes the assumed 2042 General Plan land uses compared to the 2019 baseline.

## 3.1 TRANSPORTATION AND CIRCULATION

**TABLE 3.1-2: CLOVIS GENERAL PLAN LAND USE**

<i>LAND USE</i>	<i>2019 BASELINE</i>	<i>GENERAL PLAN 2042 BUILDOUT</i>	<i>INCREASE (GENERAL PLAN VS. 2019 BASELINE)</i>
<b>HOUSING UNITS</b>			
Single family	38,560	76,590	+99%
Multi family	7,520	36,640	+387%
<b>Total</b>	<b>46,080</b>	<b>113,230</b>	<b>+146%</b>
<b>NON-RESIDENTIAL SQUARE FEET</b>			
Commercial	n/a	17,327,000	
Office	n/a	17,006,000	
Industrial	n/a	16,826,000	
Public	n/a	546,000	
<b>Total</b>	<b>n/a</b>	<b>113,230</b>	
<b>EMPLOYEES</b>	<b>37,980</b>	<b>128,100</b>	<b>+237%</b>

SOURCE: KITTELSON & ASSOCIATES, 2022

### VMT Metrics and Thresholds

For land use plans such as specific plans, community plans, and general plan updates, consistent with OPR’s recommendations, the City requires comparing the applicable VMT thresholds (such as VMT per capita and/or VMT per employee) described in Section 2.1.3 under existing conditions with the applicable VMT metrics for the expected horizon year for the land use plan. If there is a net increase in the applicable VMT metrics under horizon year conditions, then the project will have a significant impact.

The VMT per capita includes all trips made by residents, including their trips while away from home, but does not include trips visiting residences (e.g., trips made by delivery vans). The regional average VMT per capita is calculated by summing the vehicle mileage (excluding trips made by transit, bicycle or walking) for all trips made by Fresno County residents, and dividing by the county population.

The VMT per employee includes trips made by employees to and from their workplaces, including trips to and from points other than the employees’ homes, but does not include visitors to the employment sites. The regional average VMT per employee is calculated by summing the vehicle mileage (excluding trips made by transit, bicycle or walking) for all trips made by Fresno County employees, and dividing by the total number of employees in the county.

Consistent with the City’s TIA Guidelines, two measures of VMT are used in this analysis:

1. **VMT per capita.** Includes VMT for trips produced by a dwelling unit’s residents, such as to work, school, or shop, and with one end of the trip at the home, on a typical weekday. This metric is normally used for residential land uses.
2. **VMT per employee.** Includes all trips with one end at the land use, including trips by both employees, customers, and deliveries, on a typical weekday. This metric is normally used for non-residential land uses.

For informational purposes the total VMT, which includes all trips with at least one end in the planning area on a typical weekday, was provided.

## THRESHOLDS OF SIGNIFICANCE

For the purposes of this EIR, adoption and/or implementation of the Circulation Element update would result in significant impacts under CEQA, if any of the following would occur:

- a. Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities
- b. Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)
- c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)
- d. Result in inadequate emergency access

### Transit, Bicycles, and Pedestrians

Appendix G of the CEQA Guidelines indicates that impacts may be significant if a project conflicts with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. The proposed Circulation Element Update would have a significant impact on transit, bicycles, or pedestrians if it would conflict with adopted policies, plans, or programs regarding these systems, or create or exacerbate disruptions to the performance or safety of these systems.

### Vehicle Miles Traveled

Based on Appendix G of the CEQA Guidelines, the General Plan could result in a significant transportation impact if it would conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)(1), which states for land use projects, “Vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact.” CEQA Guidelines § 15064.3, subdivision (b)(4) states, “A lead agency has discretion to choose the most appropriate methodology to evaluate a project's vehicle miles traveled, including whether to express the change in absolute terms, per capita, per household or in any other measure. A lead agency may use models to estimate a project's vehicle miles traveled and may revise those estimates to reflect professional judgment based on substantial evidence.”

According to the City's TIA Guidelines, the City has selected to measure VMT and adopted the following thresholds by land use type:

- Residential: A proposed project exceeding a level of 13 percent below existing average VMT per capita in Fresno County.
- Office: A proposed project exceeding a level of 13 percent below existing average VMT per employee in Fresno County.
- Retail: A net increase in total VMT. The total VMT for the region without and with the project is calculated. The difference between the two scenarios is the net change in total VMT that is attributable to the project.
- Other land uses: The City will make a determination of the applicable thresholds on a case-by-case basis based on the land use type, project description, and setting. Research and development, medical offices, assisted living, and industrial projects may be evaluated similar to office projects using the VMT per employee metric. Projects such as religious

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institutions, regional parks, hotels, private schools and medical offices may be evaluated using the net VMT criteria similar to retail projects.

- **Mixed-Use Projects:** Evaluate each component of a mixed-use project independently and apply the significance threshold for each land use type. Alternatively, the evaluation would apply only the project’s dominant use.
- **Land use plans:** For land use plans such as specific plans, community plans, and general plan updates, consistent with OPR’s recommendations, the City requires comparing the applicable VMT thresholds (such as VMT per capita and/or VMT per employee) with the applicable VMT metrics for the expected horizon year for the land use plan. If there is a net increase in the applicable VMT metrics under horizon year conditions, then the project will have a significant impact.

The Fresno County Council of Governments (Fresno COG)<sup>2</sup> has set a goal to reduce<sup>3</sup> GHG emissions by 13% per capita by 2035 as a target for the Fresno region. Therefore, using a threshold of 13% below average VMT for residential and office projects is consistent with established regional GHG emission goals. With these considerations, the City has selected a threshold of 13 percent below baseline VMT per capita (for residential land uses) or employee (employment-related land uses) by land use type. Therefore, if any of the VMT metrics above under General Plan conditions exceed 87 percent of the same value under 2022 Baseline Conditions, VMT impacts on transportation may be considered significant. VMT thresholds by land use type are shown in Table 3.1-3.

**TABLE 3.1-3: VMT THRESHOLDS FOR LAND DEVELOPMENT PROJECTS**

<i>LAND USE</i>	<i>UNITS</i>	<i>REGIONAL BASELINE</i>	<i>THRESHOLD</i>
Residential	VMT per capita	16.1	14.0
Office	VMT per employee	25.6	22.3

SOURCE: KITTELSON & ASSOCIATES 2022

### Hazards and Emergency Access

Appendix G of the CEQA Guidelines indicates that impacts may be significant if a project would substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). Impacts may also be significant if a project results in inadequate emergency access. The proposed Circulation Element Update would have a significant impact on the transportation system if it would increase hazards due to a design feature, incompatible uses, or inadequate emergency access.

<sup>2</sup> SB 375 Greenhouse Emission Reduction Target for the Fresno County Region, Fresno Council of Governments, April 25, 2017.

<sup>3</sup> From 2010 levels.

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## IMPACTS AND MITIGATION MEASURES

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### **Impact 3.1-1: General Plan implementation would not conflict with a program, plan, policy or ordinance addressing the circulation system, including transit, bicycle, and pedestrian facilities (No Impact)**

Implementation of the Circulation Element update would primarily adopt goals and policies to promote a reduction in VMT on a per capita basis. The City adopted an Active Transportation Plan (ATP) that establishes the City's goals and objectives for pedestrian and bicycle travel. The ATP establishes standards for bicycle and pedestrian facilities and identifies planned bicycle and pedestrian network facilities to address the City's bicycle and pedestrian needs. The Circulation Element update contains several policies in support of bicycle, pedestrian, and transit facilities such as Policy 1.1 (Multimodal network), Policy 4.1 (Bike and transit backbone), Policy 4.2 (Priority for new bicycle facilities), Policy 4.4 (Bicycles and transit), Policy 5.1 (Complete Street amenities), Policy 5.5 (Pedestrian access), which support bicycle and pedestrian routes and facilities. In addition, Policy 5.2 (Development-funded facilities) specifically requires development to fund and construct facilities as shown in the Active Transportation Plan.

The Circulation Element update would not conflict with adopted programs, plans, policies, or ordinances that address the circulation system, including transit, bicycle, and pedestrian facilities. A review of the Circulation Plan including its proposed networks and policies revealed no potential policy inconsistencies or conflicts with policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities or the performance or safety of those facilities. The General Plan incorporates future networks and policies related to supporting transit, bicycle, and pedestrians in the City and SOI. These networks are consistent with regional and local planning efforts supporting these modes of travel. Therefore, there would be *no impact*.

### **Impact 3.1-2: General Plan implementation may result in VMT metrics that are greater than the applicable thresholds (13 percent below Baseline conditions) (Significant and Unavoidable)**

The following thresholds of significance are used to evaluate potential VMT impacts with implementation of the GPU:

- Residential land uses: 13% below the region's baseline year average VMT per capita. For the purpose of this analysis, the applicable region is Fresno County.
- Office/employment land uses: 13% below the region's average VMT per employee under baseline conditions.

A value of VMT per capita or VMT per employee with the Circulation Element update exceeding the respective threshold (13% below the applicable baseline) would be considered a significant impact.

VMT was calculated for the Clovis General Plan area including current city limits and the sphere of influence (SOI). Table 3.1-4 summarizes the total citywide VMT for the 2019 baseline, the applicable threshold, and the future VMT with the estimated development under the General Plan. As shown in the table, 2042 conditions with the Circulation Element update would result in decreased VMT

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per capita and VMT per employee in comparison to the 2019 baseline condition in Clovis. Residential VMT per capita would decrease by 5%, from 16.1 to 15.3, but would still be above the impact threshold of 14.0. Non-residential VMT per employee would decrease by 18%, from 24.6 to 20.1, and would be below the impact threshold of 22.3.

The reductions indicate that future development, in particular planned mixed-use development, will provide more opportunities for Clovis residents and employees to access jobs and services within the city and within shorter distances. The shorter trip distances reduce VMT by vehicles, and also increase the likelihood that trips will be made by non-auto modes such as bicycling and walking.

**TABLE 3.1-4 VMT RESULTS SUMMARY**

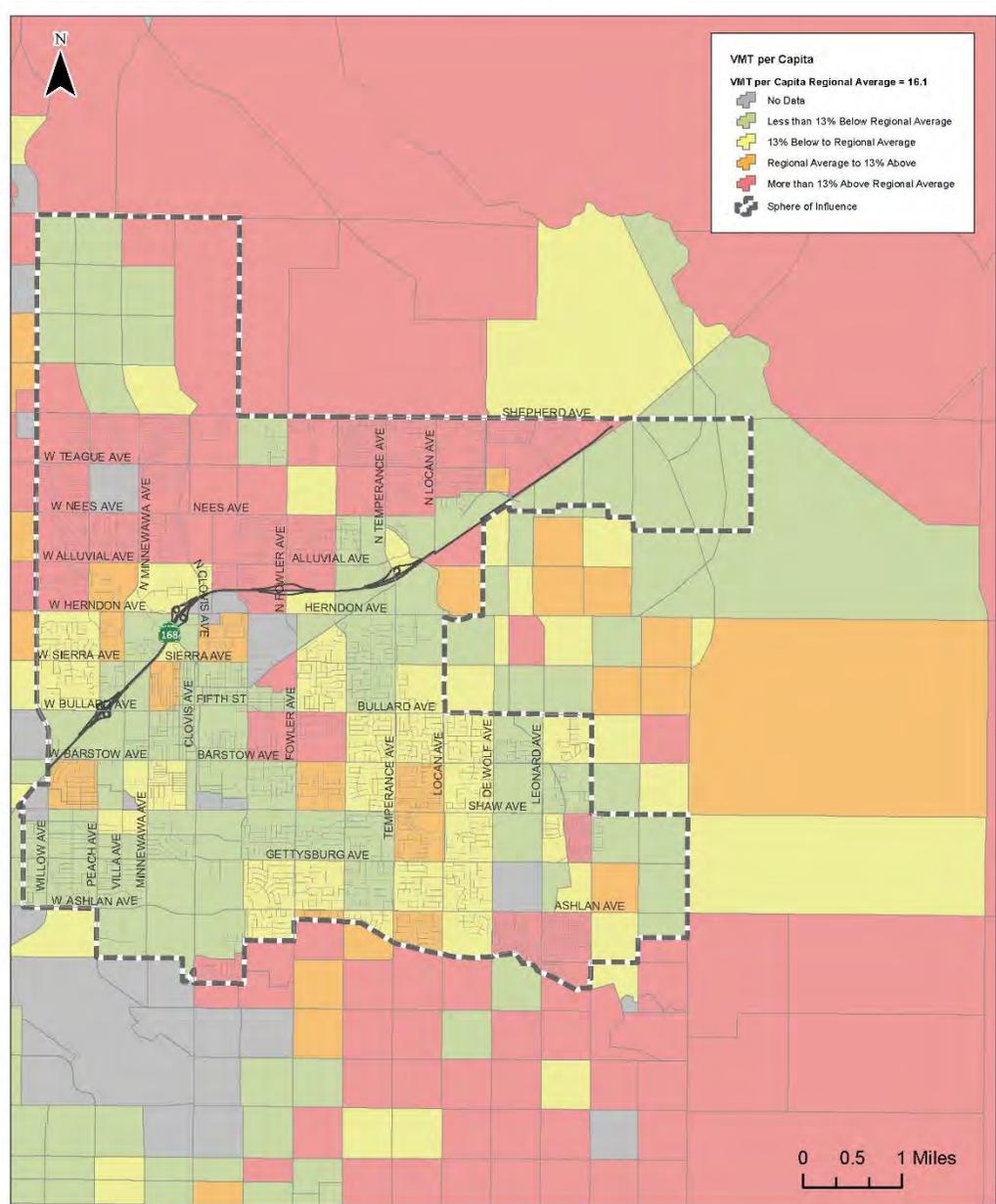
<b>UNITS</b>	<i>FRESNO Co. 2019</i>	<i>CLOVIS 2019</i>	<i>CLOVIS 2042</i>
<b>VMT PER CAPITA</b>			
Population	1,010,400	134,100	355,100
Residential VMT	16,267,400	2,159,000	5,440,900
VMT per Capita	16.1	16.1	15.3
Impact Threshold	14.0	14.0	14.0
<b>VMT PER EMPLOYEE</b>			
Employees	404,100	36,500	128,100
Employee VMT	10,345,340	897,900	2,576,600
VMT per Employee	25.6	24.6	20.1
Impact Threshold	22.3	22.3	22.3
<b>TOTAL VMT</b>			
Total VMT	25,693,300	2,687,400	5,515,700

SOURCES: FRESNO COG, KITTELSON & ASSOCIATES, 2022

In summary, implementation of the General Plan would result in total citywide VMT per capita above applicable thresholds and total citywide VMT per employee below the threshold. VMT per capita or per employee is largely a function of land use patterns, and integrated transportation infrastructure, with some effect specifically attributed to social behaviors/preferences. These characteristics can vary within a geographic area. For instance, in Clovis several areas of the city have existing, or planned, mixed use developments (housing, retail, offices, and community facilities) that are integrated or proximate to each other. With the land uses being closer in mixed use developments, the trip lengths for residents/employees traveling to work, home, or services is reduced. When you combine a well-planned circulation network that promotes easy access via bicycle, pedestrian and public transit, there are opportunities for further reductions in VMT as a result of choices by some residents/employees to shift their travel to non-motorized travel. Such mixed-use land use patterns tend to have a positive effect when it comes to reducing VMT per capita for people living and working in those areas. To the contrary, several areas of the City have existing, or planned, uses that are less mixed, and are more isolated and distant from other uses that serve residents/employees living in the area. The more separated, or isolated, housing is from retail, offices, and community facilities, the greater the trip lengths will be for those individuals. This will result in higher VMT per capita for people living in those areas.

Figure 3.1-1 shows the different values of future projected VMT per capita for TAZs within the Clovis SOI, and Figure 3.1-2 shows the same type of information for VMT per employee.

24913 - City of Clovis VMT Implementation



#12424873 - City of Clovis VMT Implementation\City of Clovis\_VMT\_PerCap\_2042\_2019avg.mxd - mxd - 6:46 AM 6/16/2022

**VMT Per Capita (2042)  
Compared to 2019 Regional Average (16.1)**

**Figure  
3.1-1**



Coordinate System: NAD 1983 StatePlane California IV FIPS 0404 Feet  
Data Source: City of Clovis



While total VMT per capita in the Clovis SOI is projected to have an overall exceedance of the impact threshold, it is noted that the VMT per capita for residential uses in some areas is projected to be below the impact threshold once all General Plan land uses are implemented. These include some currently developed areas, particularly in the southwest part of the city closer to goods and services, as well as some new development areas in the north and northeast portions of the SOI where mixed-use development is proposed. It is also noted that the VMT per capita for residential uses in some areas is projected to exceed the impact threshold once all General Plan land uses are implemented. These include some currently developed areas, but is predominately areas of new development in the northern and southern portion of the city which is generally farther from established services.

As individual land use development projects are implemented consistent with the General Plan, a focused project-specific VMT analysis may determine if the VMT per capita or per employee for that individual project exceed the impact threshold.

- The base year VMT screening maps associated with the Transportation Impact Analysis Guidelines may be used to identify if a project is in a current low VMT area and can be screened from VMT analysis.
- For land use projects which are not screened out based on the base year VMT mapping, and require further VMT analysis, Figures 3.1-1 and 3.1-2 can provide an indication if a focused VMT analysis for a development project is likely to result in a less-than-significant VMT impact with future development conditions.

VMT per capita is not static, rather it is a very dynamic metric that is affected by many variables specific to an individual project, with land use patterns being one of the most influential variables. It is anticipated that a VMT analysis for most future project proposals would generally fit the VMT per capita expectations illustrated in Figure 3.1-1 and 3.1-2, and many will screen out. However, it is also anticipated that there will be future project proposals that do not screen out, and that the VMT analysis will show an exceedance of the threshold. All projects will be required to comply with the policies of the Circulation Element, and implement mitigation measures that are relevant and feasible. However, it is anticipated that even with consistency with the Circulation Element policies, and implementation of mitigation measures, there will be significant and unavoidable impacts associated with development of individual projects that exceed the applicable VMT threshold. General Plan policies and options for mitigation are discussed further below.

The Circulation Element update goals and policies are intended to reduce VMT. The overarching goal for the Circulation Element is “a comprehensive and well-maintained multimodal circulation system that provides for the safe and efficient movement of people and goods, as well as encourages reductions in Vehicle Miles Traveled (VMT) through well-planned pedestrian connections and improved connectivity.” The following is a list of new policies added to the Circulation Element Update that would promote a reduction in VMT:

- Policy 2.6 **Vehicle Miles Traveled.** Development projects shall comply with the City’s Transportation Analysis Guidelines and provide the appropriate VMT mitigation measures as determined through the analysis.

## 3.1 TRANSPORTATION AND CIRCULATION

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- Policy 2.7 **VMT Mitigation Fee Program.** Evaluate the feasibility of a VMT mitigation fee program and explore opportunities for establishing an in-lieu mitigation fee to offset VMT impacts from development.
- Policy 2.8 **Partner with local agencies and stakeholders.** Partner with other local and regional agencies and stakeholders to explore VMT mitigation measures at the regional scale.
- Policy 8.1 **Transportation Demand Management.** Develop Transportation Demand Management (TDM) measures that promote, enhance, and make available feasible alternative modes of transportation to residents, employees, and visitors.
- Policy 8.2 **Transit Routes.** As development occurs in the City's growth areas, continue to evaluate transit routes to determine the most efficient methods of transporting people between residential neighborhoods and goods and services.
- Policy 8.3 **Bicycle Lanes.** Partner with any local bicycle advocacy groups to improve the design, location, and functionality of bicycle lanes to encourage safe and efficient travel lanes.
- Policy 8.4 **Connectivity between residential and commercial.** Continue to explore opportunities for increased non-vehicular connectivity between new and existing residential development and commercial uses.
- Policy 8.5 **Community outreach and education.** Explore the feasibility of a community outreach and education program that promotes and highlights opportunities for safe and efficient non-vehicular modes of transportation for commuting and recreation.
- Policy 8.6 **Employer commute programs.** Work with businesses to encourage commuter programs and infrastructure that promotes alternative modes of transportation reducing the use of single-occupancy vehicles, such as additional bicycle racks/lockers, on-site shower facilities, and perks for employees who commute.

Implementing the goals and policies presented above are intended to promote accessibility, encourage non-vehicle transportation modes, expand transit services, and develop TDM program requirements that reduce VMT associated with new development. When implemented, these types of policies can influence social behaviors by presenting a resident/employee with more transportation choices. The more times non-motorized transportation choices are selected as a method of travel, the more reduction in VMT per capita will be observed within the population.

While these policies can help to reduce the VMT per capita and VMT per employee, it is not anticipated that they would be sufficient to achieve the reduction of 13% below existing baseline for the City as a whole. As previously stated, land use patterns are one of the most influential variables affecting VMT per capita. The Circulation Element Update does not affect the land use patterns of the General Plan, rather, it is an accommodative policy document intended to facilitate

efficient transportation within the framework of the land use patterns defined in the Land Use Element.

It is anticipated that the development of the General Plan as a whole, as well as individual projects, will not be able to fully mitigate VMT per capita to below thresholds of significance. The following mitigation measures would be required in conjunction with the development of land use and infrastructure projects under the General Plan in order to mitigate the VMT impacts to the extent feasible. However, there are no feasible mitigation measures that would fully mitigate this impact. This impact will remain **Significant and Unavoidable**.

#### MITIGATION MEASURE(S)

**Mitigation Measure TRANS-1:** *Implement a Commute Trip Reduction Program: The City shall implement a commute trip program applicable to all or selected employers in the City of Clovis. The criteria for inclusion in the commute trip reduction program are to be determined by the City, and could be based on building size, square footage of retail uses above the amount that qualifies to be screened out as local-serving, number of potential employees and/or other criteria that are appropriate for participation in the program. The program would include the following components that may be applicable for existing land uses and new land use development projects:*

- *trip reduction targets*
- *measures to discourage single occupancy vehicles while encouraging alternative modes of transportation such as carpooling, ridesharing, vanpooling, subsidized transit passes and other benefits,*
- *include a guaranteed ride home for eligible employers,*
- *establish applicable fees and funding mechanisms,*
- *define monitoring measures and frequency, and strategies for non-compliance.*

**Mitigation Measure TRANS-2:** *Support the Implementation of Transportation Management Associations (TMAs) for Focused Areas: The City shall identify focused areas to implement TMAs via public-private partnerships to support the implementation, management and monitoring of transportation demand management (TDM) programs. Transportation Management Associations are non-profit, member-controlled organizations that provide transportation services in a particular area, such as a commercial district, mall, medical center or industrial park. They generally consist of area businesses with local government support. TMAs provide an institutional framework for TDM programs and services. They are usually more cost effective than programs managed by individual businesses. TMAs allow small employers to provide Commute Trip Reduction services comparable to those offered by large companies. The main goal for TMAs in Clovis would be to maximize the reduction of VMT. Implementation of TMAs may consist of the following:*

- *Identify focused areas and Specific Plans that would have the density and mix of land uses compatible with multimodal travel and adoption of TDM, as well as the potential to enter development and funding agreements with the City for TMA support.*

## 3.1 TRANSPORTATION AND CIRCULATION

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- *Provide seed funding and work with applicants to develop service agreements for the development of TMAs.*

**Mitigation Measure TRANS-3:** *Provide Bicycle Facilities: The City shall require land uses that generate more than 500 daily trips (which is the threshold that screens small projects from a detailed VMT analysis) to provide bike parking, bike lockers, showers, and personal lockers. This measure is designed to promote commuting by bicycle and support transit first/last mile access. Bicycle facilities shall be required to be constructed in conjunction with each project and funded by the applicant.*

**Mitigation Measure TRANS-4:** *Improve Street Connectivity: The City shall require new area plans and new housing projects to provide a well-connected street network, particularly for non-motorized connections. Increased intersection density, alleyways, and mid-block pedestrian crossings may be a proxy for street connectivity and accessibility to connect a variety of land uses. Characteristics of street network connectivity include short block lengths, numerous three and four-way intersections, and minimal dead-ends (cul-de-sacs). Street connectivity helps to facilitate shorter vehicle trips and greater numbers of walk and bike trips and thus a reduction in VMT.*

### SIGNIFICANCE AFTER MITIGATION

VMT reduction depends on factors such as actual implementation of planned land use development, demographic change, household preferences for housing types and locations, the cost of fuel, and the competitiveness of transit relative to driving, which relates to congestion along vehicular commute routes that are not under the City's jurisdiction, as well as transit provided by agencies other than the City. The feasibility and effectiveness of the mitigation measures is unknown at this time. The City cannot demonstrate definitively at this time that implementation of these policies would achieve VMT reductions to meet the VMT per capita threshold. With implementation of the Circulation Element policies and the recommended mitigation measures, this impact would remain **significant and unavoidable**.

Significance With Mitigation: Significant and unavoidable.

### **Impact 3.1-3: General Plan implementation may increase hazards due to a design feature, incompatible uses, or inadequate emergency access (Less than Significant)**

Implementation of the proposed Circulation Element Update would result in new roadways and new bicycle, pedestrian and transit routes, and would increase the number of users on the city's transportation system. There will be a need to ensure that hazards are not increased with the construction of new facilities and new users, and that adequate emergency access provisions are made to accommodate increased population and growth.

It is noted that the Circulation Element update is a programmatic-level document, which does not include actual design or construction of circulation facilities. Hazards are typically assessed at the project-level when an actual design and construction of a circulation facility is proposed. Potential impacts associated with future development projects would be analyzed and evaluated in detail through the environmental review process for those later projects. The City's design and

construction standards and specifications provide for coordinated and standardized development of City facilities, including roadways. The standards apply to, regulate, and guide the design and preparation of plans, and the construction of streets, highways, alleys, drainage, traffic signals, site access, and related public improvements.

The Circulation Element update contains policies in support of safe circulation by all modes, including requirements that roadways are designed consistent with City standards, designed to provide adequate emergency access and address safety concerns. The Circulation Element includes policies to minimize the number and enhance safety at vehicular conflict points (Policy 3.7), and to partner with advocacy groups to improve design, location, and functionality of bicycle lanes to encourage safe travel (Policy 8.3).

Implementation of General Plan policies would ensure that each future project would ensure have a ***less than significant*** related to circulation, hazards, and emergency access.

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The California Environmental Quality Act (CEQA) requires an Environmental Impact Report (EIR) to evaluate a project's effects in relationship to broader changes occurring, or that are reasonably foreseeable to occur, in the surrounding environment. Accordingly, this chapter presents a discussion of CEQA-mandated analysis for cumulative impacts, significant irreversible effects, and significant and unavoidable impacts associated with the proposed Project.

## 4.1 CUMULATIVE SETTING AND IMPACT ANALYSIS

### INTRODUCTION

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CEQA requires that an EIR contain an assessment of the cumulative impacts that could be associated with the proposed Project. According to CEQA Guidelines Section 15130(a), “an EIR shall discuss cumulative impacts of a project when the project’s incremental effect is cumulatively considerable.” “Cumulatively considerable” is defined in CEQA Guidelines section 15065(a)(3) as meaning that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects” (as described in Section 15130). As defined in CEQA Guidelines Section 15355, a cumulative impact consists of an impact that is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts. A cumulative impact occurs from:

*...the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.*

In addition, Section 15130(b) identifies that the following three elements are necessary for an adequate cumulative analysis:

- 1) Either:
  - (A) A list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency; or,
  - (B) A summary of projections contained in an adopted local, regional or statewide plan, or related planning document, that describes or evaluates conditions contributing to the cumulative effect. Such plans may include: a general plan, regional transportation plan, or plans for the reduction of greenhouse gas emissions. A summary of projections may also be contained in an adopted or certified prior environmental document for such a plan. Such projections may be supplemented with additional information such as a regional modeling program. Any such document shall be referenced and made available to the public at a location specified by the lead agency.

## 4.0 OTHER CEQA-REQUIRED TOPICS

- 2) A summary of the expected environmental effects to be produced by those projects with specific reference to additional information stating where that information is available; and
- 3) A reasonable analysis of the cumulative impacts of the relevant projects. An EIR shall examine reasonable, feasible options for mitigating or avoiding the project's contribution to any significant cumulative effects.

Where a lead agency is examining a project with an incremental effect that is not "cumulatively considerable," a lead agency need not consider that effect significant, but shall briefly describe its basis for concluding that the incremental effect is not cumulatively considerable.

### CUMULATIVE SETTING

The cumulative setting for this analysis is defined by the Fresno COG 2042 land use forecast for the RTP/SCS based on regional economic forecasts, with a revised forecast to account for more anticipated development in a number of Clovis SOI areas by 2042. A detailed mapping of parcels and allowable development was compiled to determine the maximum buildout potential of each parcel and planning area. Table 4.1 summarizes the cumulative 2042 General Plan land uses.

**TABLE 4.1: CLOVIS GENERAL PLAN LAND USE**

<i>LAND USE</i>	<i>2019 BASELINE</i>	<i>GENERAL PLAN 2042 BUILDOUT</i>	<i>INCREASE (GENERAL PLAN VS. 2019 BASELINE)</i>
<b>HOUSING UNITS</b>			
Single family	38,560	76,590	+99%
Multi family	7,520	36,640	+387%
<b>Total</b>	<b>46,080</b>	<b>113,230</b>	<b>+146%</b>
<b>NON-RESIDENTIAL SQUARE FEET</b>			
Commercial	n/a	17,327,000	
Office	n/a	17,006,000	
Industrial	n/a	16,826,000	
Public	n/a	546,000	
<b>Total</b>	<b>n/a</b>	<b>113,230</b>	
<b>EMPLOYEES</b>	<b>37,980</b>	<b>128,100</b>	<b>+237%</b>

SOURCE: KITTELSON & ASSOCIATES, 2022

### CUMULATIVE EFFECTS OF THE PROJECT

#### Method of Analysis

Although the environmental effects of an individual project may not be significant when that project is considered separately, the combined effects of several projects may be significant when considered collectively. State CEQA Guidelines 15130 requires a reasonable analysis of a project's cumulative impacts, which are defined as "two or more individual effects which, when considered together are considerable or which compound or increase other environmental impacts." The cumulative impact that results from several closely related projects is: the change in the environment which results from the incremental impact of the project when added to other

closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time (State CEQA Guidelines 15355[b]). Cumulative impact analysis may be less detailed than the analysis of the project's individual effects (State CEQA Guidelines 15130[b]).

There are two approaches to identifying cumulative projects and the associated impacts. The list approach identifies individual projects known to be occurring or proposed in the surrounding area in order to identify potential cumulative impacts. The projection approach uses a summary of projections in adopted General Plans or related planning documents to identify potential cumulative impacts. This EIR uses a projection approach for the cumulative analysis and considers the proposed Project in light of buildout of the General Plan.

### **Project Assumptions**

The proposed Project's contribution to environmental impacts under cumulative conditions is based on implementation of General Plan policies and the TIA Guidelines. See Chapter 2.0, Project Description, for a complete description of the proposed Project.

### **Cumulative Impacts**

#### TRANSPORTATION AND CIRCULATION

This section considers the impacts of the Project within the context of long-term traffic conditions that may accompany the development of regional circulation system improvements and regional residential and non-residential development.

***Impact 4.1: Under Cumulative conditions, General Plan implementation may conflict with a program, plan, policy or ordinance addressing the circulation system, including transit, bicycle, and pedestrian facilities (Less than Significant and Less than Cumulatively Considerable)***

The Circulation Element of the 2014 Clovis General Plan is being updated to comply with changes in state law as it relates to VMT. The Circulation Element update would not conflict with adopted programs, plans, policies, or ordinances. The Circulation Element update itself addresses transit, bicycle, and pedestrian facilities. A review of the Circulation Element including its proposed networks and policies revealed no potential policy inconsistencies or conflicts with policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities or the performance or safety of those facilities. Implementation of the Circulation Element update would have ***no impact*** relative to this topic.

***Impact 4.2: Under Cumulative conditions, General Plan implementation may result in VMT metrics that are greater than the applicable thresholds (13 percent below Baseline conditions) (Significant and Unavoidable and Cumulatively Considerable)***

Cumulative VMT was calculated for the Clovis General Plan area including current city limits and the sphere of influence (SOI). Residential VMT per capita would decrease by 5%, from 16.1 to 15.3,

but would still be above the impact threshold of 14.0. Non-residential VMT per employee would decrease by 18%, from 24.6 to 20.1, and would be below the impact threshold of 22.3. VMT is largely a function of land use patterns, and integrated transportation infrastructure.

It is noted that there are some areas of the city with existing, or planned, mixed use developments (housing, retail, offices, and community facilities) that will have reduced VMT per capita when compared to the cumulative average, while other areas will have elevated VMT per capita when compared to the cumulative average. Implementing the goals and policies from the Circulation Element are intended to promote accessibility, encourage non-vehicle transportation modes, expand transit services, and develop Transportation Demand Management (TDM) program requirements that reduce VMT associated with new development. When implemented, these types of policies are anticipated to influence social behaviors by presenting a resident/employee with more transportation choices. The more times non-motorized transportation choices are selected as a method of travel, the more reduction in cumulative VMT per capita will be observed within the population.

While these policies are expected to help reduce the cumulative VMT, it is not anticipated that they would be sufficient to achieve the reduction of 13% below existing baseline for the City as a whole. Additionally, the Circulation Element Update does not affect the land use patterns of the General Plan. The following mitigation measures would be required in conjunction with the development of land use and infrastructure projects under the General Plan in order to mitigate the VMT impacts to the extent feasible. However, there are no feasible mitigation measures that would fully mitigate this cumulative impact. This impact will remain **significant and unavoidable** and **cumulatively considerable**.

***Impact 4.3: Under Cumulative conditions, General Plan implementation may increase hazards due to a design feature, incompatible uses, or inadequate emergency access (Less than Significant and Less than Cumulatively Considerable)***

Hazards are typically assessed at the project-level when an actual design and construction of a circulation facility is proposed. Potential impacts associated with future development projects would be analyzed and evaluated in detail through the environmental review process for those later projects. The City's design and construction standards and specifications provide for coordinated and standardized development of City facilities, including roadways. The standards apply to, regulate, and guide the design and preparation of plans, and the construction of streets, highways, alleys, drainage, traffic signals, site access, and related public improvements.

The Circulation Element update contains policies in support of safe circulation by all modes, including requirements that roadways are designed consistent with City standards, designed to provide adequate emergency access and address safety concerns. The Circulation Element includes policies to minimize the number and enhance safety at vehicular conflict points (Policy 3.7), and to partner with advocacy groups to improve design, location, and functionality of bicycle lanes to encourage safe travel (Policy 8.3). The Circulation Element update does not include actual design or construction of circulation facilities.

Implementation of General Plan policies would ensure that each future project would ensure have a **less than significant** and **less than cumulatively considerable** impact relative to this topic.

## 4.2 SIGNIFICANT IRREVERSIBLE EFFECTS

### LEGAL CONSIDERATIONS

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EIRs for certain kinds of projects, as set forth in CEQA Guidelines section 15127, must discuss significant irreversible environmental changes. These projects include those involving (i) the adoption, amendment, or enactment of a plan, policy, or ordinance of a public agency, (ii) the adoption by a Local Agency Formation Commission of a resolution making determinations, or (iii) the parallel preparation of an environmental impact statement under the federal National Environmental Policy Act.

Here, the proposed Project falls into one of these categories, in that it requires the adoption or amendments of plans, policies, and ordinances. Irreversible environmental effects are described as:

- The project would involve a large commitment of nonrenewable resources;
- The primary and secondary impacts of a project would generally commit future generations to similar uses (e.g., a highway provides access to previously remote area);
- The project involves uses in which irreversible damage could result from any potential environmental accidents associated with the project; or
- The phasing of the proposed consumption of resources is not justified (e.g., the project involves the wasteful use of energy).

Determining whether the proposed Project would result in significant irreversible effects requires a determination of whether key resources would be degraded or destroyed such that there would be little possibility of restoring them. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.

### Analysis

Implementation of the proposed Project would not result in the conversion of land currently for the development of residential and commercial uses. Implementation of the proposed Project would not constitute a long-term commitment to any land uses. There would not be resources such as energy, human resources, lumber and other forest products, sand and gravel, asphalt, petrochemicals, and metals that would need to be committed to implementing the proposed Project. Overall, implementation of the proposed Project would have no significant irreversible effects.

## 4.3 SIGNIFICANT AND UNAVOIDABLE IMPACTS

CEQA Guidelines Section 15126.2(b) requires an EIR to discuss unavoidable significant environmental effects, including those that can be mitigated but not reduced to a level of insignificance. The following significant and unavoidable impacts of the proposed Project are

## 4.0 OTHER CEQA-REQUIRED TOPICS

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discussed in Sections 3.1 and previously in this chapter (cumulative-level). Refer to those discussions for further details and analysis of the significant and unavoidable impact identified below:

- Impact 3.1-2: General Plan implementation may result in VMT metrics that are greater than the applicable thresholds (13 percent below Baseline conditions) (Significant and Unavoidable)
- Impact 4.2: Under Cumulative conditions, General Plan implementation may result in VMT metrics that are greater than the applicable thresholds (13 percent below Baseline conditions) (Significant and Unavoidable and Cumulatively Considerable)

## 5.1 CEQA REQUIREMENTS

The California Environmental Quality Act (CEQA) requires that an Environmental Impact Report (EIR) analyze a reasonable range of feasible alternatives that would feasibly attain most of the basic objectives of the project while reducing or avoiding one or more significant environmental effects of the project. The range of alternatives required in an EIR is governed by a “rule of reason” that requires an EIR to set forth only those alternatives necessary to permit a reasoned choice (CEQA Guidelines Section 15126.6[f]). Where a potential alternative was examined but not chosen as one of the range of alternatives, the CEQA Guidelines require that the EIR briefly discuss the reasons the alternative was dismissed.

Alternatives that are evaluated in the EIR must be potentially feasible alternatives. However, not all possible alternatives need to be analyzed. An EIR must “set forth only those alternatives necessary to permit a reasoned choice.” (CEQA Guidelines, Section 15126.6(f).) The CEQA Guidelines provide a definition for a “range of reasonable alternatives” and, thus limit the number and type of alternatives that need to be evaluated in an EIR.

First and foremost, alternatives in an EIR must be potentially feasible. In the context of CEQA, “feasible” is defined as:

*... capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social and technological factors. (CEQA Guidelines 15364)*

The inclusion of an alternative in an EIR is not evidence that it is feasible as a matter of law, but rather reflects the judgment of lead agency staff that the alternative is potentially feasible. The final determination of actual feasibility will be made by the lead agency decision-making body through the adoption of CEQA Findings at the time of action on the Project. (*California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 957, 999-1001 (CNPS); *Mira Mar Mobile Community v. City of Oceanside* (2004) 119 Cal.App.4th 477, 489; see also CEQA Guidelines, §§ 15091(a) (3) [findings requirement, where alternatives can be rejected as infeasible]; 15126.6 [(an EIR) must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation“].) The following factors may be taken into consideration in the assessment of the feasibility of alternatives: site suitability, economic viability, availability of infrastructure, general plan consistency, other plan or regulatory limitations, jurisdictional boundaries, and the ability of the proponent to attain site control (Section 15126.6 (f) (1)).

In addition, agency decisionmakers, in assessing actual feasibility, may legitimately consider whether particular alternatives, compared with a proposed Project, represent an undesirable balance of competing policy considerations or fail to attain project objectives to the same degree as a proposed Project. (See *City of Del Mar v. City of San Diego* (1982) 133 Cal.App.3d 410, 417 [“‘feasibility’ under CEQA encompasses ‘desirability’ to the extent that desirability is based on a reasonable balancing of the relevant economic, environmental, social, and technological factors”];

## 5.0 ALTERNATIVES TO THE PROPOSED PROJECT

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*CNPS, supra*, 177 Cal.App.4th at p. 1001[same]; *San Diego Citizenry Group v. County of San Diego* (2013) 219 Cal.App.4th 1, 17 [same]; *Sierra Club v. County of Napa* (2004) 121 Cal.App.4th 1490, 1506-1509 [upholding CEQA findings rejecting alternatives in reliance on applicant's project objectives]; *Citizens for Open Government v. City of Lodi* (2012) 296 Cal.App.4th 296, 314-315 [court upholds agency action where alternative selected "entirely fulfill" a particular project objective and "would be 'substantially less effective' in meeting" the lead agency's "goals"]; and *In re Bay-Delta Programmatic Environmental Impact Report Coordinated Proceedings* (2008) 43 Cal.4th 1143, 1165, 1166 (Bay-Delta) ["feasibility is strongly linked to achievement of each of the primary program objectives"; "a lead agency may structure its EIR alternative analysis around a reasonable definition of underlying purpose and need not study alternatives that cannot achieve that basic goal"].)

Equally important to the formulation of a reasonable range of alternatives in an EIR is the need for alternatives to substantially lessen one or more of the significant effects of a proposed Project. Although the law does not require agencies to exclusively focus in this context on the significant unavoidable effects of a proposed Project, doing so is certainly an effective way to meet this requirement. Here, the following significant and unavoidable impacts of the proposed Project are discussed in Sections 3.1 and Chapter 4.0 (cumulative-level):

- Impact 3.1-2: General Plan implementation may result in VMT metrics that are greater than the applicable thresholds (13 percent below Baseline conditions) (Significant and Unavoidable)
- Impact 4.2: Under Cumulative conditions, General Plan implementation may result in VMT metrics that are greater than the applicable thresholds (13 percent below Baseline conditions) (Significant and Unavoidable and Cumulatively Considerable)

The following analysis of alternatives focuses on significant impacts of the proposed Project, including both those that can be mitigated to a less-than-significant level and those that would remain significant even if mitigation is applied or for which no feasible mitigation is available.

A Notice of Preparation (NOP) was circulated to the public to solicit recommendations for a reasonable range of alternatives to the proposed Project. Additionally, a public scoping meeting was held during the public review period to solicit recommendations for a reasonable range of alternatives to the proposed Project. No specific alternatives were recommended by commenting agencies or the general public during the NOP public review process.

### PROJECT OBJECTIVES

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The following objectives were established for the proposed Project:

- Update City Policy in the Circulation Element to meet the mandates of State law related to conformance with SB 743.
- Establish Transportation Impact Analysis Guidelines to meet the requirements of State law.

- Updates to City Policy and Guidelines should not obstruct and prevent the City from growing in accordance with the City's existing plans for growth.

## 5.2 ALTERNATIVES CONSIDERED IN THIS EIR

Three alternatives to the proposed Project were developed based on input from City staff, and the technical analysis performed to identify the environmental effects of the proposed Project. The alternatives analyzed in this EIR include the following three alternatives in addition to the proposed Project:

- No Project Alternative
- Policy Change Only Alternative
- TIA Guidelines Only Alternative

### NO PROJECT ALTERNATIVE

---

This alternative assumes that there would be no focused update to its existing General Plan. There would be no policy changes to the Circulation Element, and the City would not adopt Transportation Impact Analysis Guidelines supportive of the Circulation Element. Under this alternative, the City would not be making any policy changes in response to SB 743, but would still be required to analyze projects for VMT. In the absence of defined TIA Guidelines, the City would utilize the Office of Planning and Research (OPR) Guidance for analyzing VMT.

### POLICY CHANGE ONLY ALTERNATIVE

---

This alternative assumes that there would be a focused update to its existing General Plan. This would include policy changes to the Circulation Element intended to meet the mandates of State law related to conformance with SB 743. Under this alternative, the City would not adopt Transportation Impact Analysis Guidelines supportive of the Circulation Element, but would still be required to analyze projects for VMT. In the absence of defined TIA Guidelines, the City would utilize the OPR Guidance for analyzing VMT.

### TIA GUIDELINES ONLY ALTERNATIVE

---

This alternative assumes that there would be no focused update to its existing General Plan. There would be no policy changes to the Circulation Element, but the City would adopt Transportation Impact Analysis Guidelines defining the methodology for analyzing VMT impacts in Clovis. Under this alternative, the City would not be making any policy changes in response to SB 743, but would still be required to analyze projects for VMT.

## 5.3 ENVIRONMENTAL ANALYSIS

The alternatives analysis provides a summary of the relative impact level of significance associated with each alternative for each of the environmental issue areas analyzed in this EIR. Following the analysis of each alternative, Table 5.0-1 summarizes the comparative effects of each alternative.

### NO PROJECT ALTERNATIVE

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#### **Traffic/Circulation**

Under this alternative there would be no focused update to the General Plan Circulation Element. The policies of the existing Circulation Element would remain unchanged, and the new policies proposed to reduce VMT would not be adopted. Additionally, the City would not adopt the Transportation Impact Analysis (TIA) Guidelines supportive of the Circulation Element.

This alternative would not create or reduce any physical environmental impacts given that it is a policy related alternative and not a physical development. However, under this alternative, the City would not be responsive to SB 743, and would not be establishing VMT thresholds, VMT analysis methodologies, and measures intended to reduce VMT within the city. Instead, new projects would not have a well-defined method of analysis and mitigation strategy and inconsistent approaches would be common place.

Overall, this alternative would be anticipated to result in slightly higher VMT per capita because there would be no requirement for new projects to implement VMT reduction measures. This alternative is inferior to the proposed Project.

### POLICY CHANGE ONLY ALTERNATIVE

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#### **Traffic/Circulation**

This alternative assumes that there would be a focused update to its existing General Plan, but that there would not be a TIA Guidelines supportive of the Circulation Element.

This alternative would not create or reduce any physical environmental impacts given that it is a policy related alternative and not a physical development. Under this alternative, the City would be partially responsive to SB 743, in that they would be establishing policies aimed at reducing VMT within the City. However, there would not be a well-defined VMT threshold, or VMT analysis methodology. New projects would have some mitigation strategy outlined in the policies, but would not benefit from a well-defined method of analysis and mitigation strategy and inconsistent approaches would be common place.

Overall, this alternative would be anticipated to result in approximately the same VMT per capita, although it may be slightly higher. There would also be an inconsistent approach to analysis of VMT. This alternative is inferior to the proposed Project.

### TIA GUIDELINES ONLY ALTERNATIVE

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#### **Traffic/Circulation**

This alternative assumes that there would be no focused update to its existing General Plan, but that there would be a TIA Guidelines defining the methodology for analyzing VMT impacts in Clovis.

This alternative would not create or reduce any physical environmental impacts given that it is a policy related alternative and not a physical development. Under this alternative, the City would be partially responsive to SB 743, in that they would be establishing a VMT threshold and consistent approach to analyzing and reducing VMT within the City. However, there would not be new policy direction from the City to reduce VMT. New projects would have some mitigation strategy outlined in the TIA Guidelines, but would not benefit from the direction provided by policy.

Overall, this alternative would be anticipated to result in approximately the same VMT per capita, although it may be slightly higher. There would be an inconsistency between future projects in their approach to reducing VMT, because there is no policy directive requiring VMT reduction. This alternative is inferior to the proposed Project.

### ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA requires that an environmentally superior alternative be identified among the alternatives that are analyzed in the EIR. If the No Project Alternative is the environmentally superior alternative, an EIR must also identify an environmentally superior alternative among the other alternatives (CEQA Guidelines Section 15126.6(e)(2)). The environmentally superior alternative is that alternative with the least adverse environmental impacts when compared to the proposed Project.

As summarized in Table 5.0-1 below, the Proposed Project is superior to the other Alternatives. The proposed Project is considered the environmentally superior alternative because it provides the greatest potential to be consistent with State law (SB 743), and to establish a consistent approach to VMT analysis, and VMT reduction when compared to the other alternatives. The proposed Project establishes the City's policy direction related to these topics, while the other alternatives only partial address VMT reduction, or do not address the topic.

**TABLE 5.0-1: COMPARISON SUMMARY OF ALTERNATIVES**

<i>ENVIRONMENTAL TOPIC</i>	<i>PROPOSED PROJECT</i>	No Project Alternative	Policy Change Only Alternative	TIA Guidelines Only Alternative
<i>TRANSPORTATION AND CIRCULATION (TC)</i>				
TC Impact 3.1-1	No Impact	Slightly greater impact	Slightly greater impact	Slightly greater impact
TC Impact 3.1-2	Significant and Unavoidable	Greater Impact	Slightly Greater Impact	Slightly Greater Impact
TC Impact 3.1-3	Less than Significant	Equal Impact	Equal Impact	Equal Impact
Comparison to Proposed Project	Superior	Inferior (4th)	Inferior (2nd)	Inferior (3rd)

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CITY OF CLOVIS

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Ricky Caperton, AICP..... Deputy City Planner

Dave Merchen..... City Planner

Sean Smith, PE ..... Supervising Civil Engineer

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**REFERENCES**

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City of Clovis. 2014. General Plan, City of Clovis (Adopted August 25, 2014).

City of Clovis. 2014. Draft Program Environmental Impact Report, Volume I: Draft PEIR and Appendix A, General Plan and Development Code Update, State Clearinghouse No. 2012061069. (Certified August 25, 2014).

City of Clovis. 2020. Interim Transportation Impact Analysis Guidelines.

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NOTICE OF PREPARATION

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# NOTICE OF PREPARATION AND INITIAL STUDY

FOR THE

## 2014 CLOVIS GENERAL PLAN CIRCULATION ELEMENT UPDATE

(State Clearinghouse No. 2012061069)

APRIL 4, 2022

*Prepared for:*

City of Clovis | Planning Division  
1033 Fifth Street  
Clovis, CA 93612  
559.324.2347

*Prepared by:*

De Novo Planning Group  
1020 Suncast Lane, Suite 106  
El Dorado Hills, CA 95762  
(916) 580-9818

D e N o v o P l a n n i n g G r o u p

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A Land Use Planning, Design, and Environmental Firm





NOTICE OF PREPARATION AND  
INITIAL STUDY

FOR THE

2014 CLOVIS GENERAL PLAN  
CIRCULATION ELEMENT UPDATE

(State Clearinghouse No. 2012061069)

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# NOTICE OF PREPARATION

TO: State Clearinghouse  
State Responsible Agencies  
State Trustee Agencies  
Other Public Agencies  
Interested Organizations

FROM: Ricky Caperton, AICP | Deputy City Planner  
City of Clovis | Planning Division  
1033 Fifth Street  
Clovis, CA 93612  
559.324.2347  
rcaperton@cityofclovis.com

SUBJECT: Notice of Preparation – 2014 Clovis General Plan Circulation Element Update

## EIR CONSULTANT

Steve McMurtry, Principal Planner  
De Novo Planning Group  
1020 Suncastr Lane, Suite 106  
El Dorado Hills, CA 95762  
Phone: (916) 580-9818

An Initial Study has been prepared for the proposed project and is attached to this Notice of Preparation (NOP). The Initial Study lists those issues that will require detailed analysis and technical studies that will need to be evaluated and/or prepared as part of the Environmental Impact Report (EIR). The EIR will consider potential environmental effects of the proposed project to determine the level of significance of the environmental effect, and will analyze these potential effects to the detail necessary to make a determination on the level of significance.

Those environmental issues that have been determined to be less than significant will have a discussion that is limited to a brief explanation of why those effects are not considered potentially significant. In addition, the EIR may also consider those environmental issues which are raised by responsible agencies, trustee agencies, and members of the public or related agencies during the NOP process.

We need to know the views of your agency or organization as to the scope and content of the environmental information germane to your agency's statutory responsibilities or of interest to your organization in connection with the proposed project. Specifically, we are requesting the following:

1. If you are a public agency, state whether your agency will be a responsible or trustee agency for the proposed project and list the permits or approvals from your agency that will be required for the project and its future actions;
2. Identify significant environmental effects and mitigation measures that you believe need to be explored in the EIR with supporting discussion of why you believe these effects may be significant;

3. Describe special studies and other information that you believe are necessary for the City to analyze the significant environmental effects, alternatives, and mitigation measures you have identified;
4. For public agencies that provide infrastructure and public services, identify any facilities that must be provided (both on- and off-site) to provide services to the proposed project;
5. Indicate whether a member(s) from your agency would like to attend a scoping workshop/meeting for public agencies to discuss the scope and content of the EIR's environmental information; and
6. Provide the name, title, and telephone number of the contact person from your agency or organization that we can contact regarding your comments.

Due to the time limits mandated by State law, your response must be sent and received by the City of Clovis by the following deadlines:

- For responsible agencies, not later than 30 days after you receive this notice.
- For all other agencies and organizations, not later than 30 days following the publication of this Notice of Preparation. The 30-day review period begins Monday, April 4, 2022 and ends on Wednesday, May 4, 2022.

If we do not receive a response from your agency or organization, we will presume that your agency or organization has no response to make.

A responsible agency, trustee agency, or other public agency may request a meeting with the City or its representatives in accordance with Section 15082(c) of the CEQA Guidelines. A public scoping meeting and neighborhood meeting will be held during the public review period as follows:

Scoping Meeting: A scoping meeting will be held in-person at the City of Clovis Council Chamber, located at 1033 Fifth Street, Clovis, CA 93612 on Wednesday, April 27, 2022 from 5:30 p.m. to 6:30 p.m. If you have any questions, please contact Ricky Caperton, AICP, Deputy City Planner, at rcaperton@cityofclovis.com. If you prefer to attend virtually, you can either enter this link (<https://bit.ly/3Do2pwT>) into your web browser prior to the start of the meeting or dial in by phone (no video) at 1-844-992-4726 Access Code: 2486 738 6617.

Please send your response to Ricky Caperton, AICP, Deputy City Planner at the City of Clovis | Planning Division, 1033 Fifth Street, Clovis, CA 93612. If you have any questions, please contact Ricky Caperton, AICP, Deputy City Planner at 559.324.2347 or via email at: rcaperton@cityofclovis.com.

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## INITIAL STUDY CHECKLIST

### **PROJECT TITLE**

2014 Clovis General Plan Circulation Element Update (SCH 2012061069)

### **LEAD AGENCY NAME AND ADDRESS**

City of Clovis Planning Division  
1033 Fifth Street  
Clovis, CA 93612

### **CONTACT PERSON**

Ricky Caperton, AICP | Deputy City Planner  
City of Clovis | Planning Division  
1033 Fifth Street  
Clovis, CA 93612  
559.324.2347  
rcaperton@cityofclovis.com

### **PROJECT LOCATION AND SETTING**

The City of Clovis (City) is in the central portion of Fresno County, approximately 6.5 miles northeast of the City of Fresno downtown area. The City is surrounded by portions of unincorporated Fresno County to the north, east, and south and by the City of Fresno to the west and southwest.

The City, its sphere of influence (SOI), and specific areas beyond the City and its SOI (non-SOI Plan Area) are defined and referred to herein as the Plan Area. At the local level, the Plan Area is generally bounded by Copper Avenue on the north, Willow Avenue on the west, Academy Avenue on the east, and Shields Avenue on the south. State Route 168 (SR-168) bisects the City from the southwest to the northeast.

### **PROJECT BACKGROUND**

#### *TRANSPORTATION PLANNING CHANGES*

Senate Bill (SB) 743, passed in 2013, resulted in several statewide California Environmental Quality Act (CEQA) changes. It required the California Governor's Office of Planning and Research (OPR) to establish new metrics for determining the significance of transportation impacts of projects within transit priority areas (TPAs) and allows OPR to extend use of the metrics beyond TPAs. TPA means "an area within one-half mile of a major transit stop that is existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a transportation improvement program adopted to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations."

OPR selected Vehicle Miles Traveled (VMT) as the required transportation impact metric and applied their discretion to require its use statewide for determining potential CEQA impacts related to traffic. This legislation also established that aesthetic and parking effects of a residential, mixed-use residential, or employment center projects on an infill site within a TPA are not significant impacts on the environment. The revised CEQA Guidelines that implement this

legislation became effective on December 28, 2018, and state that vehicle Level of Service (LOS) and similar measures related to delay shall not be used as the sole basis for determining the significance of transportation impacts for land use projects. As of July 1, 2020, this requirement applied statewide.

The OPR “Technical Advisory on Evaluating Transportation Impacts in CEQA” (December 2018) includes specifications for VMT methodology and recommendations for significance thresholds, screening of project that may be presumed to have less than significant impacts, and mitigation. OPR’s screening criteria includes the following categories: small projects, projects near transit stations, affordable residential development, redevelopment projects, and local serving retail. For each category, OPR provides recommended screening analysis methods and metrics to consider. It is noted that the OPR screening criteria is a recommendation by OPR, and is generally used as guidance from OPR in the absence of specific screening criteria established by a local jurisdiction. The proposed Project, includes the City of Clovis developing their own specific screening criteria, which has similarities to the OPR recommendations, but is specifically tailored to Clovis.

### *CITY GUIDELINES AND POLICY CHANGES*

#### **Interim Transportation Impact Analysis Guidelines**

In response to SB 743, the City of Clovis initiated efforts to establish a framework for analyzing transportation impacts that was both consistent with the State’s mandates, and City policy. This effort led to the development of the Interim Transportation Impact Analysis Guidelines (adopted July 20, 2020, Resolution 20-93), which provides guidance to City staff, applicants, and consultants on the requirements to evaluate transportation impacts for projects in the city for the purpose of determining impacts under the California Environmental Quality Act (CEQA). The Interim Transportation Impact Analysis Guidelines are intended to:

- promote conformance with applicable City and State regulations;
- provide evaluation consistent with CEQA;
- ensure consistency in preparation of studies by applicants and consultants; and
- provide predictability in content for City staff and the public in reviewing studies.

The guidelines are intended to be comprehensive, however, not all aspects of every transportation analysis can be addressed within this framework and the City staff reserves the right to use its judgement to request exemptions and/or to modify requirements for specific projects at the time of the review application.

#### **Project Screening**

The Clovis TIA Guidelines provide the following five screening criteria to determine if a project will require a detailed VMT analysis:

1. Small projects
2. Provision of affordable housing
3. Local-serving retail
4. Project located in a High-Quality Transit Area (HQTA)
5. Project located in low VMT area

#### *Small Projects*

Projects that generate or attract fewer than 500 vehicle trips per day are presumed to cause a less-than-significant VMT impact. Projects that typically generate 500 vehicle daily trips are shown in Table 2.0-1.

**TABLE 2.0-1: SAMPLE SMALL PROJECTS (LESS THAN 500 DAILY TRIPS)**

LAND USE TYPE	NUMBER OF UNITS/SQUARE FEET
Single Family Residential	53 Dwelling Units
Townhome/Attached Residential	68 Dwelling Units
Retail	13,250 SF
Light Industrial	100,800 SF

NOTE: CALCULATED TRIP RATES FROM THE ITE TRIP GENERATION MANUAL, 10<sup>TH</sup> EDITION.

### *Affordable Housing*

Affordable housing is designated as housing for sale or for rent below market rate. Residential projects in high quality transit areas with a high proportion of affordable housing are presumed to have a less-than-significant transportation impact. Projects can only be screened out if they are located in an area supported by a quality walking and biking network with nearby retail and employment opportunities. If a project contains less than 100 percent affordable housing, the portion that is affordable should be screened out of a detailed VMT analysis.

### *Local-Serving Retail and Public Facilities*

Projects that are local-serving retail with 100,000 square feet gross floor area or less are presumed to have a less-than-significant impact. This applies to the entirety of a retail project; for a mixed-use project, this screening criteria should be applied to the retail/commercial component separately to determine if that portion of the project screens out of a detailed VMT analysis.

The determination of local-serving retail is based on location, the characteristics of the project and the vicinity of the site, as well as the envisioned goods and services the retail development would provide. Generally, local-serving retail primarily provides goods and services that most people need on a regular basis and be located close to where people live. Groceries, medicines, fast food and casual restaurants, fitness and beauty services are typical goods and services provided by local-serving retail centers.

The City may require that a project applicant provide a market analysis to demonstrate that the project meets the characteristics of a local-serving retail development based on the goods and services provided relative to the geographic location, the customer base, and other nearby retail uses.

Public services (e.g., police, fire stations, public utilities, neighborhood parks<sup>1</sup>) do not generally generate substantial amounts of trips and VMT. Instead, these land uses are often built to support other nearby land uses (e.g., office and residential). Therefore, these land uses can be presumed to have less-than-significant impacts on VMT. However, this presumption would not apply if the

<sup>1</sup> For the purpose of conducting VMT analyses, neighborhood parks are defined as typically including playground equipment, playfields, and picnic facilities; ranging in size of up to 30 acres; and serving as social and recreational focal points for neighborhoods.

project is sited in a location that requires employees or visitors to travel substantial distances and may require a detailed VMT analysis.

#### *High-Quality Transit Area (HQTA)*

Projects that are located in a high-quality transit area would not require a detailed VMT analysis. However, this presumption does not apply if the project:

- has a floor area ratio (FAR) of less than 0.75;
- includes substantially more parking for use by residents, customers, or employees of the project than required by the City (per Section 9.32.040 of the Municipal Code) such that it discourages use of alternative modes (transit, biking, walking) by promoting auto ownership and making driving very convenient;
- is inconsistent with the applicable Fresno Council of Governments (Fresno COG) Sustainable Communities Strategy (SCS), as determined by the City; or
- replaces affordable residential units with a smaller number of moderate- or high-income residential units.

A map of the existing High-Quality Transit Areas in the city is provided in Attachment A of the TIA Guidelines.

#### *Project Located in Low VMT Areas*

Residential and employment projects that are proposed in areas that generate VMT below adopted City thresholds are presumed to have a less-than-significant VMT impact and thus can be screened out. The City provides screening maps based on transportation analysis zones (TAZs) and results from the Fresno COG travel model. The following types of projects may be screened out of detailed VMT analysis using these criteria:

- Residential projects proposed in TAZs with total daily resident-based VMT per capita that is 13 percent less than the existing average baseline level for Fresno County
- Office or the employment portions of other non-residential uses with total daily employee-based VMT per employee that is 13 percent less than the existing average baseline level for Fresno County

The TAZs that fall into these categories are shown in green in the maps provided in Attachment B of the TIA Guidelines.

#### *Consistency with RTP/SCS*

If a proposed project is inconsistent with the adopted Fresno COG Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), the City will evaluate whether that inconsistency may result in a significant impact on transportation. Therefore, projects that are inconsistent with the RTP/SCS would not qualify for screening out of a detailed VMT analysis.

### **Circulation Element Update**

The Clovis City Council adopted the Clovis General Plan on August 25, 2014. Included in the General Plan is the Circulation Element, which determines the transportation system necessary to accommodate the planned land use and development. The Circulation Element identifies the general location and extent of existing and proposed major transportation facilities, including major thoroughfares, transportation routes, terminals, and other local public utilities and

facilities. The goals and policies in this element are closely correlated with the Land Use Element and are intended to provide a balance between the City's future growth and land use development, roadway size, traffic service levels, and community character.

As the City of Clovis developed the Interim Transportation Impact Analysis Guidelines in response to the requirements of SB 743, it became evident that the City's Circulation Element needed to be updated to be in alignment with the State's mandates, and the Interim Transportation Impact Analysis Guidelines. City staff then embarked on an update to the Circulation Element, which focuses on policy language additions that are aimed at reducing VMT by way of a variety of planning mechanisms.

## PROJECT OBJECTIVES

The following objectives were established for the Proposed Project:

- Update City Policy in the Circulation Element to meet the mandates of State law related to conformance with SB 743.
- Establish Transportation Impact Analysis Guidelines to meet the requirements of State law.
- Updates to City Policy and Guidelines should not obstruct and prevent the City from growing in accordance with the City's existing plans for growth.

## PROJECT DESCRIPTION

### *FOCUSED UPDATE*

The City of Clovis is preparing a focused update to its existing General Plan. The proposed Project concentrates on policy changes to the Circulation Element only, and does not change any other Element of the General Plan. The proposed Project also includes adoption of the Transportation Impact Analysis Guidelines, which are supportive of the Circulation Element.

The focused General Plan Update does not affect land uses or development patterns, and does not result in any physical development. The key components of the focused General Plan Update include revisions to the goals and policies in the Circulation Element. The following presents the proposed changes in a track change form.

### *GOALS AND POLICIES*

**OVERARCHING GOAL:** A comprehensive and well-maintained multimodal circulation system that provides for the safe and efficient movement of people and goods, as well as encourages reductions in Vehicle Miles Traveled (VMT) through well-planned pedestrian connections and improved connectivity.

**Goal 1:** **A context-sensitive and "complete streets" transportation network that prioritizes effective connectivity and accommodates a comprehensive range of mobility needs.**

Policy 1.1 **Multimodal network.** The city shall plan, design, operate, and maintain the transportation network to promote safe and convenient travel for all users: pedestrians, bicyclists, transit riders, freight, and motorists.

- Policy 1.2 **Transportation decisions.** Decisions should balance the comfort, convenience, and safety of pedestrians, bicyclists, and motorists.
- Policy 1.3 **Age and mobility.** The design of roadways shall consider all potential users, including children, seniors, and persons with disabilities.
- Policy 1.4 **Jobs and housing.** Encourage infill development that would provide jobs and services closer to housing, and vice versa, to reduce citywide vehicle miles traveled and effectively utilize the existing transportation infrastructure, as well as promote carpooling whenever possible.
- Policy 1.5 **Neighborhood connectivity.** The transportation network shall provide multimodal access between neighborhoods and neighborhood-serving uses (educational, recreational, or neighborhood commercial uses).
- Policy 1.6 **Internal circulation.** New development shall utilize a grid or modified-grid street pattern. Areas designated for residential and mixed-use village developments should feature short block lengths of 200 to 600 feet.
- Policy 1.7 **Narrow streets.** The City may permit curb-to-curb dimensions that are narrower than current standards on local streets to promote pedestrian and bicycle connectivity and enhance safety.
- Policy 1.8 **Network completion.** New development shall complete the extension of stub streets planned to connect to adjacent streets, where appropriate.

## **Goal 2: A roadway network that is well planned, funded, and maintained.**

- Policy 2.1 **Level of service.** The following is the City's level of service (LOS) standards:
- A. Achieve LOS D vehicle traffic operations during the a.m. and p.m. peak hours
  - B. Allow exceptions on a case-by-case basis where lower levels of service would result in other public benefits, such as:
    - i. Preserving agriculture or open space land
    - ii. Preserving the rural/historic character of a neighborhood
    - iii. Preserving or creating a pedestrian-friendly environment in Old Town or mixed-use village districts
    - iv. Avoiding adverse impacts to pedestrians, cyclists, and mass transit riders
    - v. Where right-of-way constraints would make capacity expansion infeasible
- Policy 2.2 **Multimodal LOS.** Monitor the evolution of multimodal level of service (MMLOS) standards. The city may adopt MMLOS standards when appropriate.
- Policy 2.3 **Fair share costs.** New development shall pay its fair share of the cost for circulation improvements in accordance with the city's traffic fee mitigation program.
- Policy 2.4 **Right-of-way dedication.** The city may require right-of-way dedication essential to the circulation system in conjunction with any development or annexation. The City shall request the County of Fresno to apply the same requirements in the Clovis planning area.

- Policy 2.5 **Regional and state roadway funding.** Coordinate with the County of Fresno, City of Fresno, Fresno Council of Governments, and Caltrans to fund roadway improvements adjacent to and within the City's Planning Area.
- Policy 2.6 **Vehicle Miles Traveled.** Development projects shall comply with the City's VMT Transportation Analysis Guidelines and provide the appropriate VMT mitigation measures as determined through the analysis.
- Policy 2.7 **VMT Mitigation Fee Program.** Evaluate the feasibility of a VMT mitigation fee program and explore opportunities for establishing an in-lieu mitigation fee to offset VMT impacts from development.
- Policy 2.8 **Partner with local agencies and stakeholders.** Partner with other local and regional agencies and stakeholders to explore VMT mitigation measures at the regional scale.

**Goal 3: A multimodal transportation network that is safe and comfortable in the context of adjacent neighborhoods.**

- Policy 3.1 **Traffic calming.** Employ traffic-calming measures in new developments and existing neighborhoods to control traffic speeds and maintain safety.
- Policy 3.2 **Neighborhood compatibility.** Periodically review and update design standards to ensure that new and redesigned streets are compatible with the context of adjacent neighborhoods.
- Policy 3.3 **Old Town and mixed use village centers.** Transportation decisions on local streets in Old Town and mixed-use village centers shall prioritize pedestrians, then bicyclists, then mass transit, then motorists.
- Policy 3.4 **Road diets.** Minimize roadway width as feasible to serve adjacent neighborhoods while maintaining sufficient space for public safety services.
- Policy 3.5 **Roadway widening.** Only consider street widening or intersection expansions after considering multimodal alternative improvements to non-automotive facilities.
- Policy 3.6 **Soundwalls.** Design roadway networks to disperse traffic to minimize traffic levels. Discourage soundwalls along new collector and local streets when feasible.
- Policy 3.7 **Conflict points.** Minimize the number of and enhance safety at vehicular, pedestrian, and bicycle conflict points.
- Policy 3.8 **Access management.** Minimize access points and curb cuts along arterials and prohibit them within 200 feet of an intersection where possible. Eliminate and/or consolidate driveways when new development occurs or when traffic operation or safety warrants.
- Policy 3.9 **Park-once.** Encourage "park-once" designs where convenient, centralized public parking areas are accompanied by safe, visible, and well-marked access to sidewalks and businesses.

Policy 3.10 **Pedestrian access and circulation.** Entrances at signalized intersections should provide sidewalks on both sides of the entrance that connect to an internal pedestrian pathway to businesses and throughout nonresidential parking lots larger than 50 spaces.

Policy 3.11 **Right-of-way design.** Design landscaped parkways, medians, and right-of-ways as aesthetic buffers to improve the community's appearance and encourage non-motorized transportation.

Policy 3.12 **Residential orientation.** Where feasible, residential development should face local and collector streets to increase visibility and safety of travelers along the streets, and encourage pedestrian and bicycle access.

**Goal 4: A well-planned and maintained pedestrian circulation network that promotes increased use of the City's bicycle, transit, and pedestrian facilities in order to reduce commuting by single-occupancy vehicles whenever possible .**

Policy 4.1 **Bike and transit backbone.** The bicycle and transit system should connect Shaw Avenue, Old Town, the Medical Center/R&T Park, and the three Urban Centers.

Policy 4.2 **Priority for new bicycle facilities.** Prioritize investments in the backbone system over other bicycle improvements.

Policy 4.3 **Freeway crossings.** Require separate bicycle and pedestrian crossings for new freeway extensions and encourage separate crossings where Class I facilities are planned to cross existing freeways.

Policy 4.4 **Bicycles and transit.** Coordinate with transit agencies to integrate bicycle access and storage into transit vehicles, bus stops, and activity centers.

Policy 4.5 **Transit stops.** Improve and maintain safe, clean, comfortable, well-lit, and rider-friendly transit stops that are well marked and visible to motorists.

Policy 4.6 **Transit priority corridors.** Prioritize investments for, and transit services and facilities along the transit priority corridors.

Policy 4.7 **Bus rapid transit.** Plan for bus rapid transit and transit-only lanes on transit priority corridors as future ridership levels increase.

**Goal 5: A complete system of trails and pathways accessible to all residents focusing on connectivity between adjacent neighborhoods, parks, trails, and goods and services.**

Policy 5.1 **Complete street amenities.** Upgrade existing streets and design new streets to include complete street amenities, prioritizing improvements to bicycle and pedestrian connectivity or safety, consistent with the Bicycle Transportation Master Plan and other master plans.

Policy 5.2 **Development-funded facilities.** Require development to fund and construct facilities as shown in the Active Transportation Plan when facilities are in or adjacent to the development.

Policy 5.3 **Pathways.** Encourage pathways and other pedestrian amenities in Urban Centers and new development 10 acres or larger.

Policy 5.4 **Homeowner associations.** The city may require homeowner associations to maintain pathways and other bicycle and pedestrian facilities within the homeowner association area.

Policy 5.5 **Pedestrian access.** Require sidewalks, paths, and crosswalks to provide access to schools, parks, and other activity centers and to provide general pedestrian connectivity throughout the city.

**Goal 6: Safe and efficient goods movement with minimal impacts on local roads and neighborhoods.**

Policy 6.1 **Truck routes.** Plan and designate truck routes that minimize truck traffic through or near residential areas.

Policy 6.2 **Land use.** Place industrial and warehousing businesses near freeways and truck routes to minimize truck traffic through or near residential areas.

**Goal 7: A regional transportation system that connects Clovis to the San Joaquin Valley region.**

Policy 7.1 **Clovis Avenue extension.** Invest in the extension of Clovis Avenue north to Copper Avenue as funding is available.

Policy 7.2 **Right-of-way for future extensions.** Coordinate with Fresno County, the Fresno Council of Governments, and Caltrans to preserve future right-of-way for extending Clovis Avenue north of Copper Avenue to Auberry Road and future State Route 65.

Policy 7.3 **San Joaquin River crossing.** Collaborate with the Fresno Council of Governments and appropriate agencies to secure a San Joaquin River crossing between State Route 41 and North Fork Road.

**Goal 8: Improve and enhance the circulation network in a manner that reduces VMT through improved connectivity by focusing on modes of transportation that promotes the reduction in the use of single-occupancy vehicles whenever feasible.**

Policy 8.1 **Transportation Demand Management.** Develop Transportation Demand Management (TDM) measures that promote, enhance, and make available feasible alternative modes of transportation to residents, employees, and visitors.

Policy 8.2 **Transit Routes.** As development occurs in the City's growth areas, continue to evaluate transit routes to determine the most efficient methods of transporting people between residential neighborhoods and goods and services.

Policy 8.3 **Bicycle Lanes.** Partner with any local bicycle advocacy groups to improve the design, location, and functionality of bicycle lanes to encourage safe and efficient travel lanes.

- Policy 8.4 **Connectivity between residential and commercial.** Continue to explore opportunities for increased non-vehicular connectivity between new and existing residential development and commercial uses.
- Policy 8.5 **Community outreach and education.** Explore the feasibility of a community outreach and education program that promotes and highlights opportunities for safe and efficient non-vehicular modes of transportation for commuting and recreation.
- Policy 8.6 **Employer commute programs.** Work with businesses to encourage commuter programs and infrastructure that promotes alternative modes of transportation reducing the use of single-occupancy vehicles, such as additional bicycle racks/lockers, on-site shower facilities, and perks for employees who commute.

## **REQUESTED ENTITLEMENTS AND OTHER APPROVALS**

This analysis may be used for the following direct and indirect approvals and permits associated with adoption and implementation of the proposed Project.

### *CITY OF CLOVIS*

The City of Clovis is the lead agency for the proposed Project. The proposed focused General Plan Update will be presented to the Planning Commission for review and recommendation and to the City Council for comment, review, and consideration for adoption. The City Council has the sole discretionary authority to approve and adopt the proposed focused General Plan Update. In order to approve the proposed Project, the City Council would consider the following actions:

- Certification of the General Plan Supplemental EIR;
- Adoption of required CEQA findings and Statement of Overriding Considerations for the above action;
- Adoption of a Mitigation Monitoring and Reporting Program; and
- Approval of the focused General Plan Update.

This analysis provides a review of environmental effects associated with implementation of the proposed focused General Plan Update, which amends the adopted Clovis General Plan. When considering approval of subsequent activities under the Clovis General Plan, the focused changes to the Circulation Element must be considered. As such, the City of Clovis would utilize this Supplemental EIR, in addition to the existing certified General Plan EIR, as the basis in determining potential environmental effects and the appropriate level of environmental review, if any, of a subsequent activity. Projects or activities successive to this Supplemental EIR, would be proposed under the adopted General Plan and may include, but are not limited to, the following:

- Approval and funding of major projects and capital improvements;
- Future Specific Plan, Planned Unit Development, or Master Plan approvals;
- Annexations;
- Revisions to the Clovis Zoning Ordinance;
- Development plan approvals, such as tentative subdivision maps, variances, conditional use permits, and other land use permits;

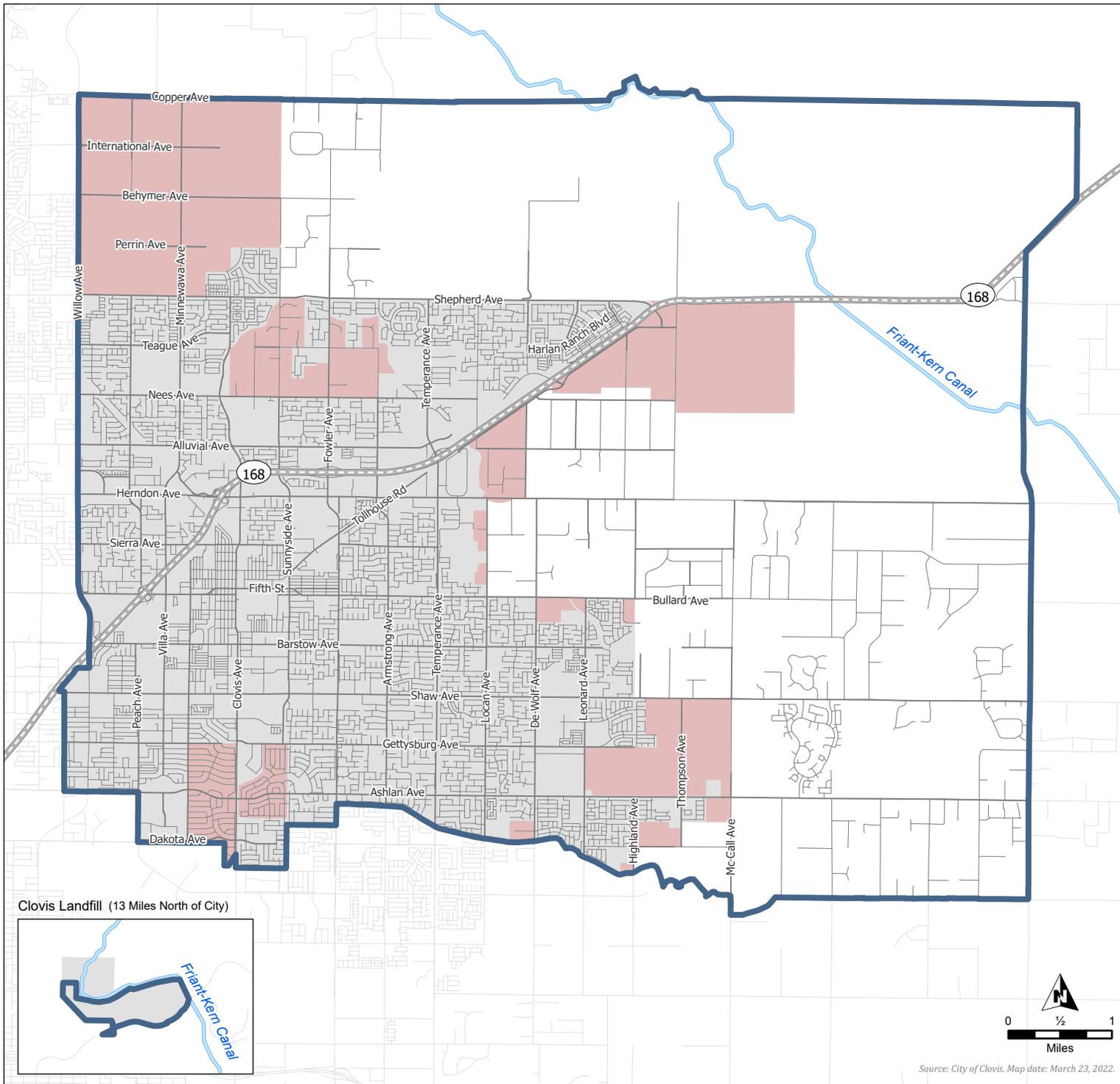
- Development Agreements;
- Property rezoning consistent with the General Plan;
- Permit issuances and other approvals necessary for public and private development projects; and
- Issuance of permits and other approvals necessary for implementation of the General Plan.

City approval of the proposed Project would not require any actions or approvals by other public agencies. However, because of the long-range planning nature of the proposed Project, the City would need to coordinate with other long range planning efforts by other agency that operate regionally. These include, but are not necessarily limited to:

- California Department of Transportation (Caltrans) coordination regarding regional transportation planning efforts.
- Fresno Council of Governments (Fresno COG) coordination regarding regional transportation planning efforts.

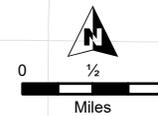
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# Figure 1 Clovis Planning Area



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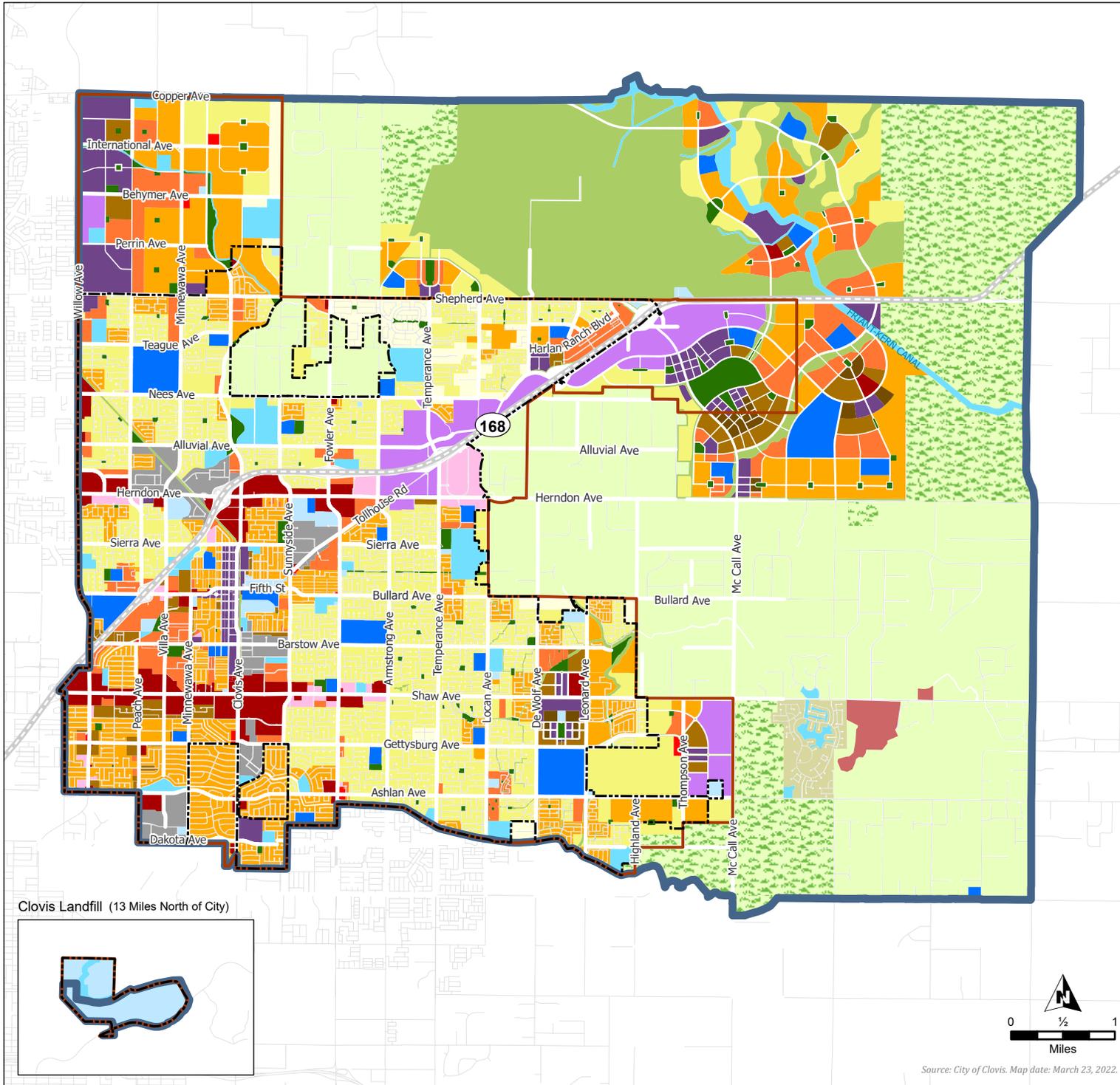
- Clovis City Limits
- Clovis Sphere of Influence
- Planning Area Boundary



Source: City of Clovis. Map date: March 23, 2022.

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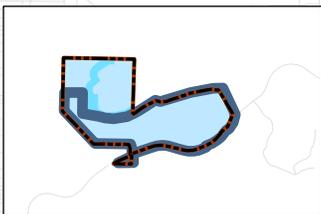
**Figure 2**  
**Land Use Diagram**



**LEGEND**

- Clovis City Limits
- Sphere of Influence
- Planning Area Boundary
- State Hwy 168
- AG: Agriculture (1 DU/20 Ac)
- RR: Rural Residential
- VL: Very Low Density Residential (0.6-2.0 DU/Ac)
- L: Low Density Residential (2.1-4.0 DU/Ac)
- M: Medium Density Residential (4.1-7.0 DU/Ac)
- MH: Medium High Density Residential (7.1-15.0 DU/Ac)
- H: High Density Residential (15.1-25.0 DU/Ac)
- VH: Very High Density Residential (25.1-43.0 DU/Ac)
- MU-V: Mixed Use Village
- MU-BC: Mixed Use Business Campus
- O: Office
- I: Industrial
- NC: Neighborhood Commercial
- GC: General Commercial
- OS: Open Space
- P: Public/Quasi-Public Facilities
- PK: Park
- S: School
- W: Water
- C-SP: Special Commercial
- PRC-FC: Planned Rural Community

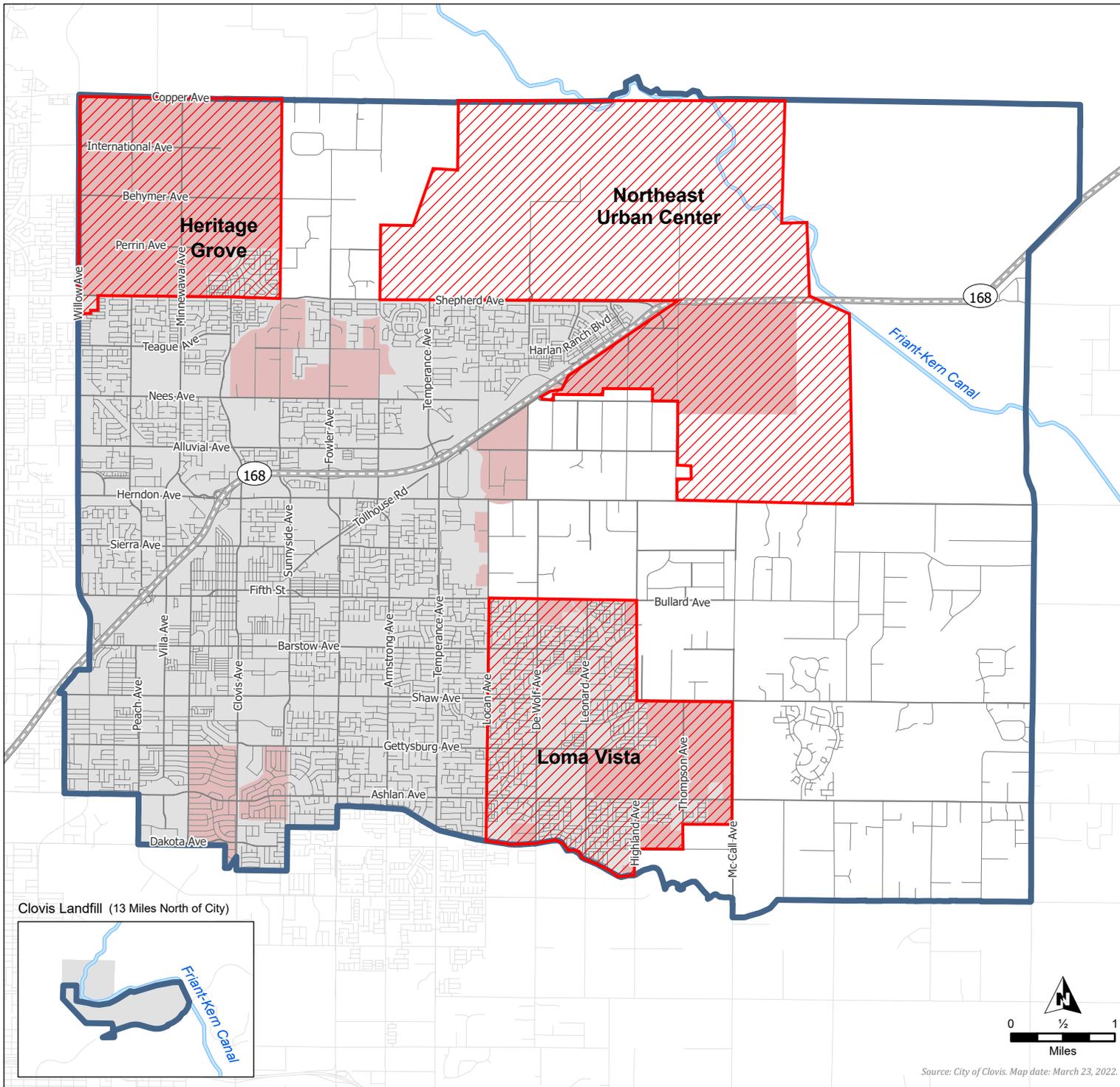
Clovis Landfill (13 Miles North of City)



Source: City of Clovis. Map date: March 23, 2022.

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**Figure 3  
Urban Centers**

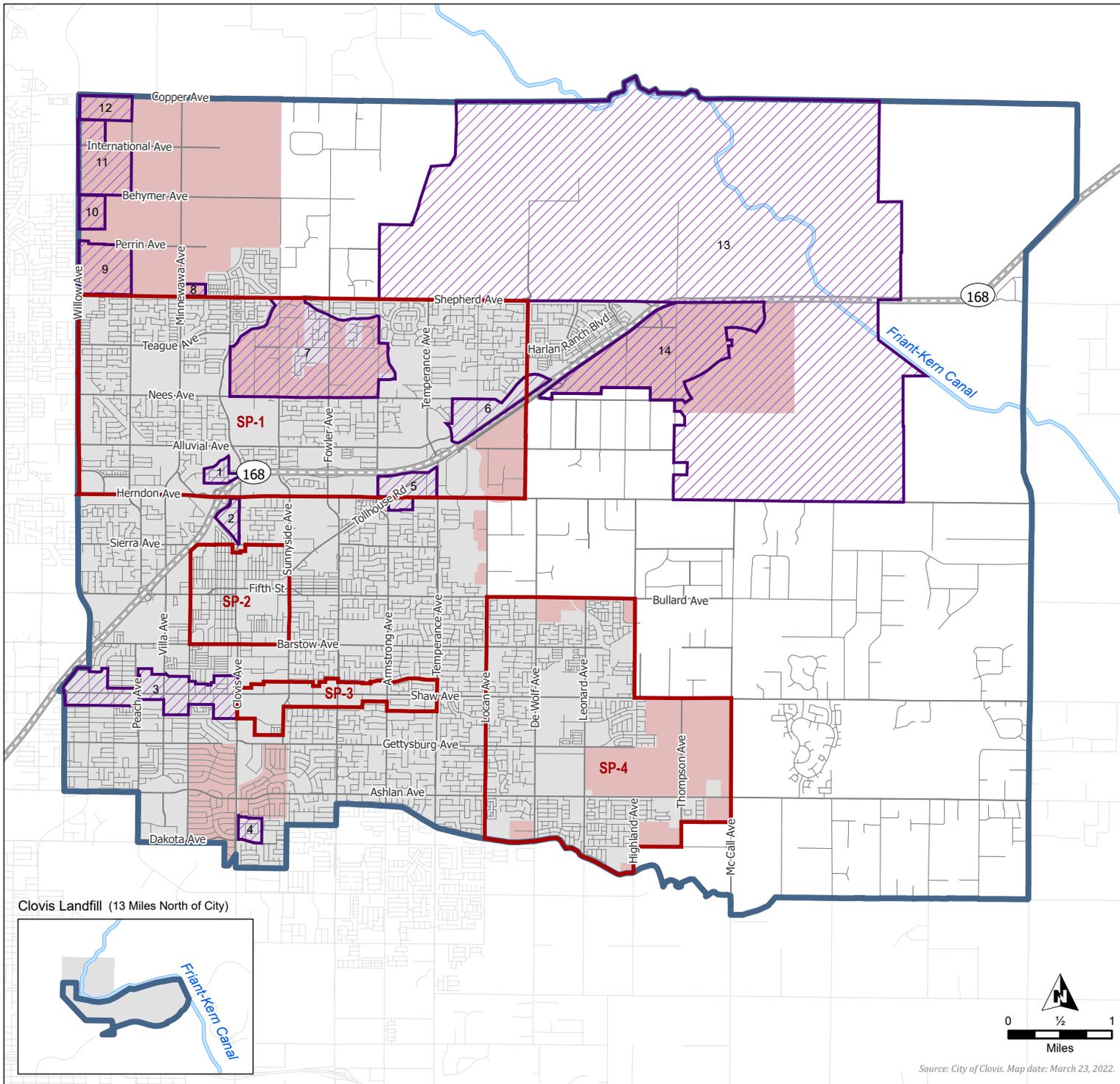


**LEGEND**

- Urban Centers
- Clovis City Limits
- Clovis Sphere of Influence
- Planning Area Boundary

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Figure 4  
Focus Area

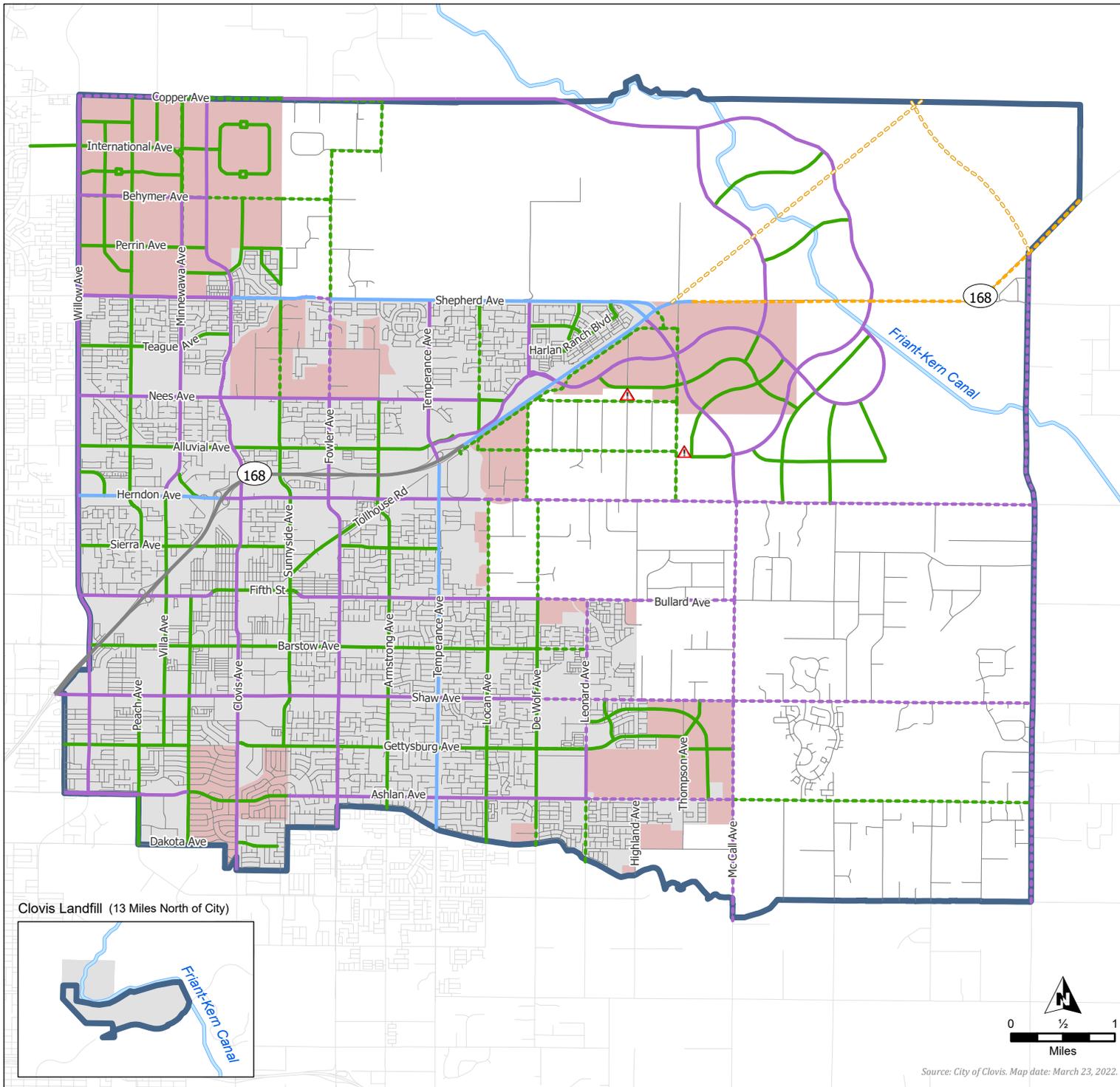


LEGEND

- Specific Plan Areas
- Focus Areas
- Clovis City Limits
- Clovis Sphere of Influence
- Planning Area Boundary

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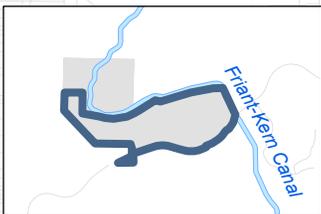
**Figure 5  
Circulation Diagram**



**LEGEND**

- Freeway
- - - Conceptual State Highway
- - - State Highway
- Expressway
- Arterial
- - - Rural County Arterial
- Collector
- - - Rural County Collector
- Local
- Clovis City Limits
- Clovis Sphere of Influence
- Planning Area Boundary
- ▲ Emergency Access Only

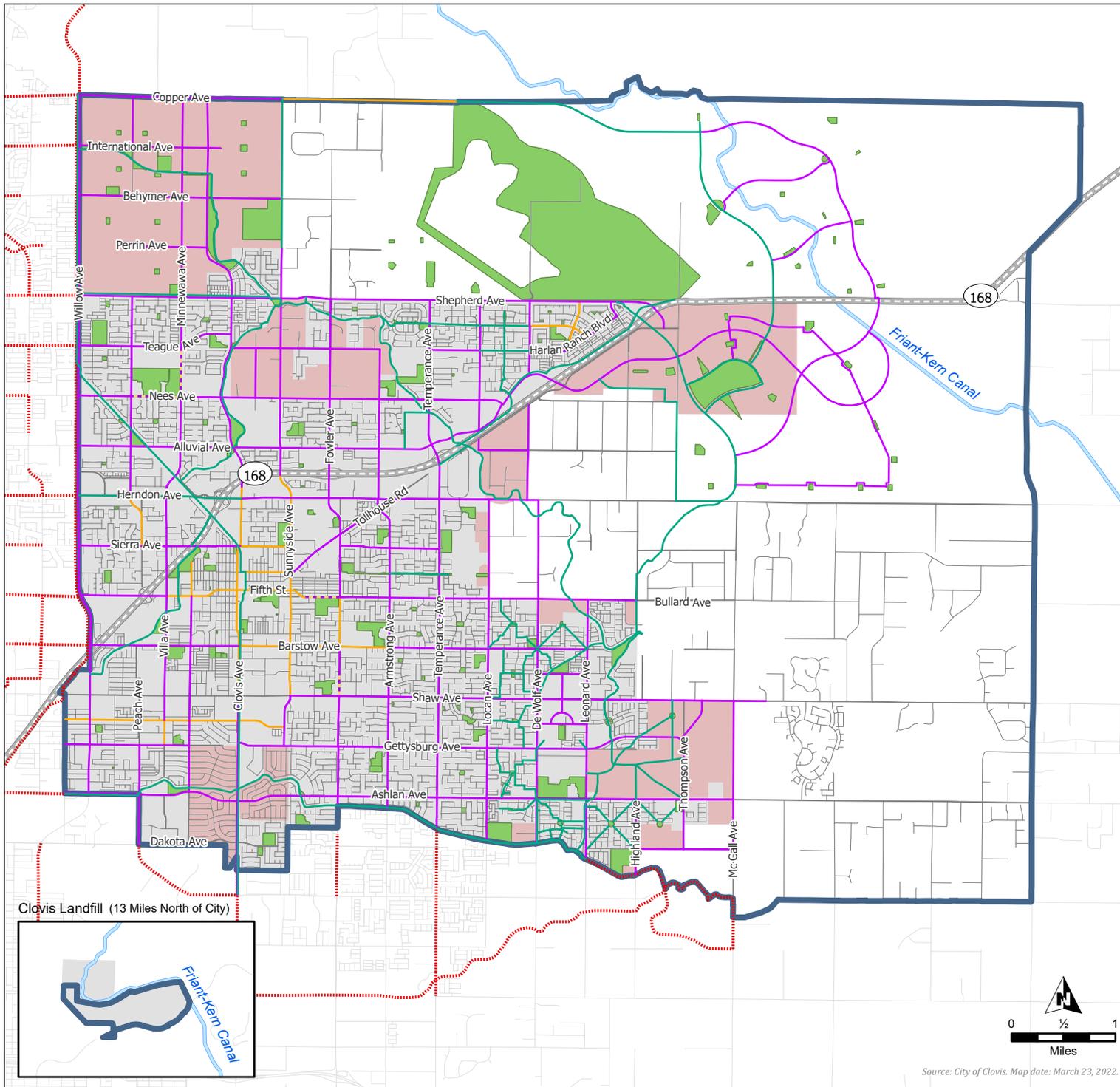
Clovis Landfill (13 Miles North of City)



Source: City of Clovis. Map date: March 23, 2022.

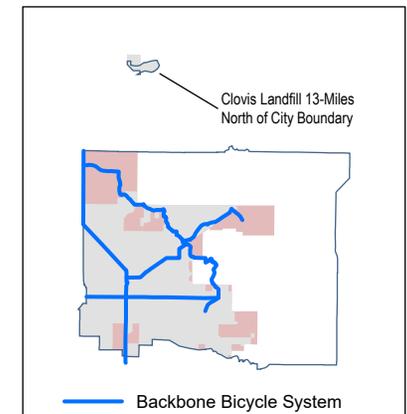
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**Figure 6  
Bicycle and Trails System**



**LEGEND**

- Class I - Multipurpose Trail
- Class II - Bike Lane
- Class III - Bike Route
- - - Class II or III - Bikeway
- - - - - City of Fresno - Existing & Proposed Trail System
- Clovis City Limits
- Clovis Sphere of Influence
- Planning Area Boundary
- City Parks

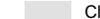


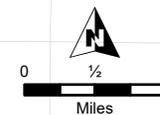
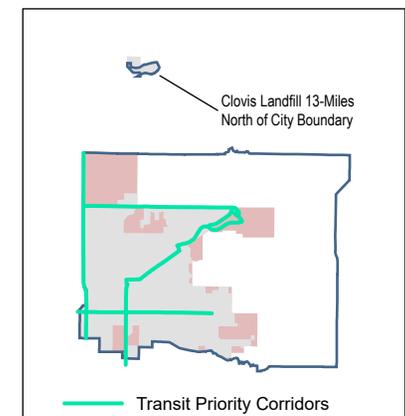
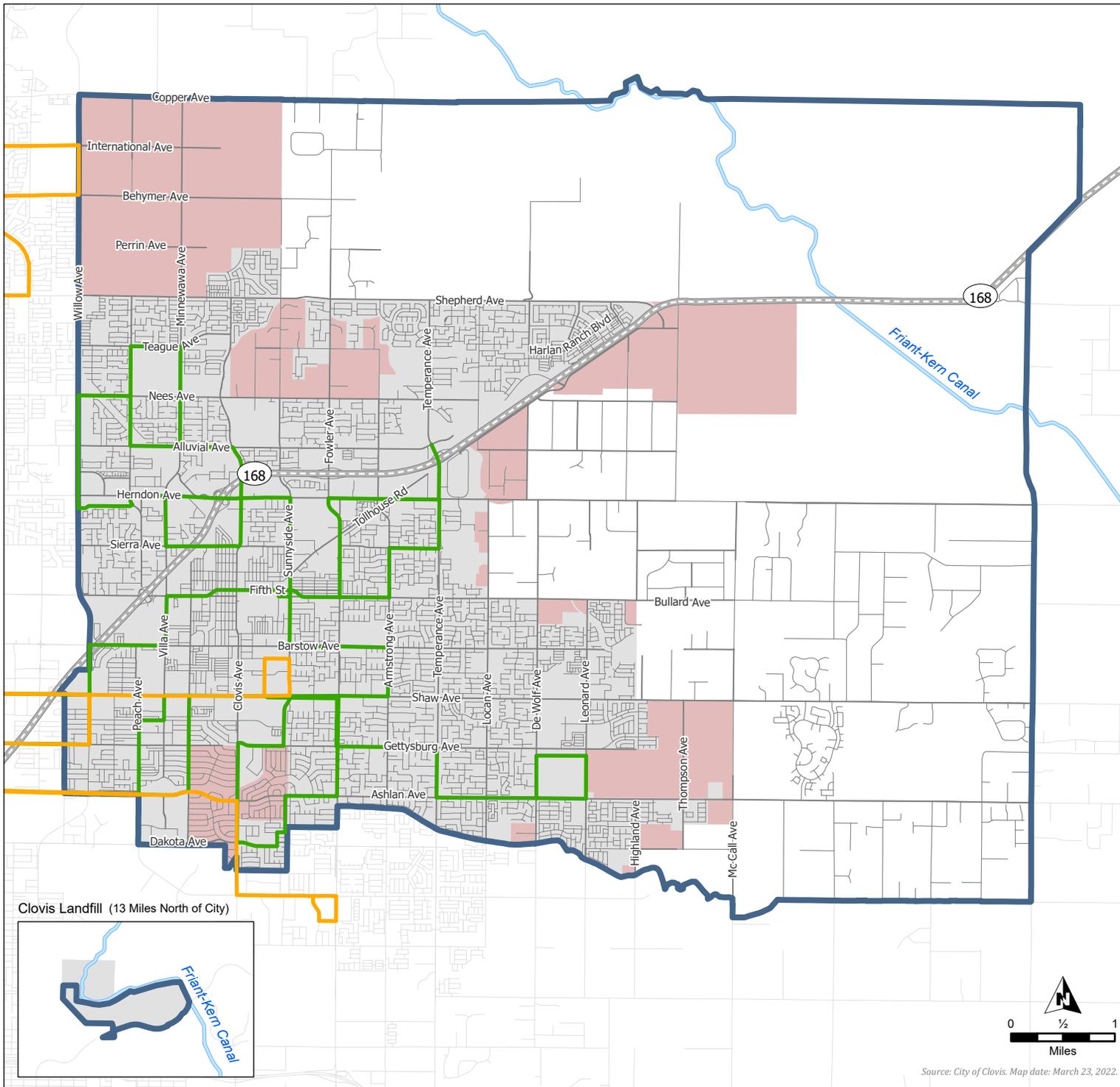
Source: City of Clovis. Map date: March 23, 2022.

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### Figure 7 Transit System

**LEGEND**

-  FAX Routes
-  Clovis Stageline Route
-  Clovis City Limits
-  Clovis Sphere of Influence
-  Planning Area Boundary



Source: City of Clovis. Map date: March 23, 2022.

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## ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

None of the environmental factors listed below would have potentially significant impacts as a result of development of this project, as described on the following pages.

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

## DETERMINATION

On the basis of this initial evaluation:

	I find that the proposed project <b>COULD NOT</b> have a significant effect on the environment, and a <b>NEGATIVE DECLARATION</b> will be prepared.
	I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A <b>MITIGATED NEGATIVE DECLARATION</b> will be prepared.
	I find that the proposed project <b>MAY</b> have a significant effect on the environment, and an <b>ENVIRONMENTAL IMPACT REPORT</b> is required.
X	I find that the proposed project <b>MAY</b> have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An <b>ENVIRONMENTAL IMPACT REPORT</b> is required, but it must analyze only the effects that remain to be addressed.
	I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or <b>NEGATIVE DECLARATION</b> pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or <b>NEGATIVE DECLARATION</b> , including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature

Date

## EVALUATION INSTRUCTIONS

- 1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
- 4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from Section XVII, "Earlier Analyses," may be cross-referenced).
- 5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
  - a) Earlier Analysis Used. Identify and state where they are available for review.
  - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
  - c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
- 7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
- 9) The explanation of each issue should identify:
  - a) The significance criteria or threshold, if any, used to evaluate each question; and
  - b) The mitigation measure identified, if any, to reduce the impact to less than significant.

## EVALUATION OF ENVIRONMENTAL IMPACTS

In each area of potential impact listed in this section, there are one or more questions which assess the degree of potential environmental effect. A response is provided to each question using one of the four impact evaluation criteria described below. A discussion of the response is also included.

- **Potentially Significant Impact.** This response is appropriate when there is substantial evidence that an effect is significant. If there are one or more "Potentially Significant Impact" entries, upon completion of the Initial Study, an EIR is required.
- **Less than Significant With Mitigation Incorporated.** This response applies when the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact". The Lead Agency must describe the mitigation measures and briefly explain how they reduce the effect to a less than significant level.
- **Less than Significant Impact.** A less than significant impact is one which is deemed to have little or no adverse effect on the environment. Mitigation measures are, therefore, not necessary, although they may be recommended to further reduce a minor impact.
- **No Impact.** These issues were either identified as having no impact on the environment, or they are not relevant to the project.

## ENVIRONMENTAL CHECKLIST

This section of the Initial Study incorporates the most current Appendix "G" Environmental Checklist Form contained in the CEQA Guidelines. Impact questions and responses are included in both tabular and narrative formats for each of the 21 environmental topic areas.

### I. AESTHETICS

<i>Would the project:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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 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 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 substantial light or glare which would adversely affect day or nighttime views in the area?				X

#### *Responses to Checklist Questions*

**Responses a-d):** This CEQA topic has been adequately analyzed in the certified EIR for the General Plan and Development Code Update (State Clearinghouse No. 2012061069) pursuant to applicable legal standards. CEQA Guidelines Section 15162 states that a supplemental analysis must be prepared for a project if there is new information of substantial importance that was not known or could not have been known at the time the previous EIR was certified. The City's desire to update City policy in the Circulation Element to meet state law related to SB 743 qualifies as new information of substantial importance not known at the time the previous EIR was certified.

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## II. AGRICULTURE AND FORESTRY RESOURCES

<i>Would the project:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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, forest land (as defined in Public Resources Code section 1222(g)) or timberland (as defined in Public Resources Code section 4526)?				X
d) Result in the loss of forest land or conversion of forest land to non-forest use?				X
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?				X

### *Responses to Checklist Questions*

**Responses a-e):** This CEQA topic has been adequately analyzed in the certified EIR for the General Plan and Development Code Update (State Clearinghouse No. 2012061069) pursuant to applicable legal standards. CEQA Guidelines Section 15162 states that a supplemental analysis must be prepared for a project if there is new information of substantial importance that was not known or could not have been known at the time the previous EIR was certified. The City's desire to update City policy in the Circulation Element to meet state law related to SB 743 qualifies as new information of substantial importance not known at the time the previous EIR was certified.

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### III. AIR QUALITY

<i>Would the project:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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 non-attainment under an applicable federal or state ambient air quality standard?				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

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*IV. BIOLOGICAL RESOURCES*

<i>Would the project:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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?				X
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and 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 native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?				X
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				X
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

*Responses to Checklist Questions*

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EIR pursuant to applicable legal standards, and does not warrant further environmental review in the supplemental analysis. The proposed project would have **No Impact** relative to this topic.

## V. CULTURAL RESOURCES

<i>Would the project:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?				X
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?				X
c) Disturb any human remains, including those interred outside of formal cemeteries?				X

### *Responses to Checklist Questions*

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*VI. ENERGY*

<i>Would the project:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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

*Responses to Checklist Questions*

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*VII. GEOLOGY AND SOILS*

<i>Would the project:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				X
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.				X
ii) Strong seismic ground shaking?				X
iii) Seismic-related ground failure, including liquefaction?				X
iv) Landslides?				X
b) Result in substantial soil erosion or the loss of topsoil?				X
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?				X
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?				X
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?				X
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?				X

*Responses to Checklist Questions*

**Responses a-c):** This CEQA topic has been adequately analyzed in the certified EIR for the General Plan and Development Code Update (State Clearinghouse No. 2012061069) pursuant to applicable legal standards. CEQA Guidelines Section 15162 states that a supplemental analysis must be prepared for a project if there is new information of substantial importance that was not known or could not have been known at the time the previous EIR was certified. The City's desire to update City policy in the Circulation Element to meet state law related to SB 743 qualifies as new information of substantial importance not known at the time the previous EIR was certified.

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*VIII. GREENHOUSE GAS EMISSIONS*

<i>Would the project:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?				X
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gasses?				X

*Responses to Checklist Questions*

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*IX. HAZARDS AND HAZARDOUS MATERIALS*

<i>Would the project:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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 or excessive noise 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

*Responses to Checklist Questions*

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## X. HYDROLOGY AND WATER QUALITY

<i>Would the project:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?				X
b) Substantially decrease 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:				X
(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 offsite;				X
(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				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

### *Responses to Checklist Questions*

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## XI. LAND USE AND PLANNING

<i>Would the project:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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

### *Responses to Checklist Questions*

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*XII. MINERAL RESOURCES*

<i>Would the project:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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

*Responses to Checklist Questions*

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**XIII. NOISE**

	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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 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?				X

*Responses to Checklist Questions*

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*XIV. POPULATION AND HOUSING*

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

*Responses to Checklist Questions*

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**XV. PUBLIC SERVICES**

	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
Fire protection?				X
Police protection?				X
Schools?				X
Parks?				X
Other public facilities?				X

*Responses to Checklist Questions*

**Responses a-c):** This CEQA topic has been adequately analyzed in the certified EIR for the General Plan and Development Code Update (State Clearinghouse No. 2012061069) pursuant to applicable legal standards. CEQA Guidelines Section 15162 states that a supplemental analysis must be prepared for a project if there is new information of substantial importance that was not known or could not have been known at the time the previous EIR was certified. The City’s desire to update City policy in the Circulation Element to meet state law related to SB 743 qualifies as new information of substantial importance not known at the time the previous EIR was certified.

CEQA Guidelines Section 15168 provides that the focus of a supplemental analysis on new information can be narrowly on new effects, which had not been considered before, and that if there are no effects on a topic beyond those disclosed in the certified EIR, no further environmental review of that topic would be required.

The City’s policy changes will narrowly affect circulation and transportation topics, but will not have a direct or indirect effect on this CEQA topic. Instead, the City’s policy changes would result in no anticipated environmental changes to this CEQA topic when compared to the environmental effects discussed under the certified EIR. As such, this CEQA topic has been adequately analyzed in the certified EIR pursuant to applicable legal standards, and does not warrant further environmental review in the supplemental analysis. The proposed project would have **No Impact** relative to this topic.

*XVI. RECREATION*

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

*Responses to Checklist Questions*

**Responses a-c):** This CEQA topic has been adequately analyzed in the certified EIR for the General Plan and Development Code Update (State Clearinghouse No. 2012061069) pursuant to applicable legal standards. CEQA Guidelines Section 15162 states that a supplemental analysis must be prepared for a project if there is new information of substantial importance that was not known or could not have been known at the time the previous EIR was certified. The City's desire to update City policy in the Circulation Element to meet state law related to SB 743 qualifies as new information of substantial importance not known at the time the previous EIR was certified.

CEQA Guidelines Section 15168 provides that the focus of a supplemental analysis on new information can be narrowly on new effects, which had not been considered before, and that if there are no effects on a topic beyond those disclosed in the certified EIR, no further environmental review of that topic would be required.

The City's policy changes will narrowly affect circulation and transportation topics, but will not have a direct or indirect effect on this CEQA topic. Instead, the City's policy changes would result in no anticipated environmental changes to this CEQA topic when compared to the environmental effects discussed under the certified EIR. As such, this CEQA topic has been adequately analyzed in the certified EIR pursuant to applicable legal standards, and does not warrant further environmental review in the supplemental analysis. The proposed project would have **No Impact** relative to this topic.

*XVII. TRANSPORTATION*

<i>Would the project:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Conflict with a program plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	X			
b) Would the project 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

*Existing Setting*

**Responses a-b):** The City adequately analyzed this CEQA topic in the certified EIR for the General Plan and Development Code Update (State Clearinghouse No. 2012061069) pursuant to applicable legal standards at that time. However, the state has adopted new regulations related to traffic analysis (SB 743), and the City has responded to these new state requirements by developing new TIA Guidelines and updating the City policies in the Circulation Element. The City's policy changes will narrowly affect circulation and transportation topics, and could have direct or indirect effects that need to be analyzed in more detail to determine the level of significance. As such, this CEQA topic will be analyzed in the supplemental analysis pursuant to applicable legal standards. The proposed project would have **Potentially Significant Impact** relative to this topic. A final significance determination will be made in the supplemental analysis after the detailed review is completed.

**Responses c-d):** This CEQA topic has been adequately analyzed in the certified EIR for the General Plan and Development Code Update (State Clearinghouse No. 2012061069) pursuant to applicable legal standards. CEQA Guidelines Section 15162 states that a supplemental analysis must be prepared for a project if there is new information of substantial importance that was not known or could not have been known at the time the previous EIR was certified. The City's desire to update City policy in the Circulation Element to meet state law related to SB 743 qualifies as new information of substantial importance not known at the time the previous EIR was certified.

CEQA Guidelines Section 15168 provides that the focus of a supplemental analysis on new information can be narrowly on new effects, which had not been considered before, and that if there are no effects on a topic beyond those disclosed in the certified EIR, no further environmental review of that topic would be required.

The City's policy changes will narrowly affect circulation and transportation topics, but will not have a direct or indirect effect on design and emergency access issues related to circulation and transportation. Instead, the City's policy changes would result in no anticipated environmental changes to this CEQA topic when compared to the environmental effects discussed under the certified EIR. As such, this CEQA topic has been adequately analyzed in the certified EIR pursuant to applicable legal standards, and does not warrant further environmental review in the supplemental analysis. The proposed project would have **No Impact** relative to this topic.

*XVIII. TRIBAL CULTURAL RESOURCES*

	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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)?				X
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resources to a California Native American tribe.				X

*Responses to Checklist Questions*

**Responses a-c):** This CEQA topic has been adequately analyzed in the certified EIR for the General Plan and Development Code Update (State Clearinghouse No. 2012061069) pursuant to applicable legal standards. CEQA Guidelines Section 15162 states that a supplemental analysis must be prepared for a project if there is new information of substantial importance that was not known or could not have been known at the time the previous EIR was certified. The City's desire to update City policy in the Circulation Element to meet state law related to SB 743 qualifies as new information of substantial importance not known at the time the previous EIR was certified.

CEQA Guidelines Section 15168 provides that the focus of a supplemental analysis on new information can be narrowly on new effects, which had not been considered before, and that if there are no effects on a topic beyond those disclosed in the certified EIR, no further environmental review of that topic would be required.

The City's policy changes will narrowly affect circulation and transportation topics, but will not have a direct or indirect effect on this CEQA topic. Instead, the City's policy changes would result in no anticipated environmental changes to this CEQA topic when compared to the environmental effects discussed under the certified EIR. As such, this CEQA topic has been adequately analyzed in the certified EIR pursuant to applicable legal standards, and does not warrant further environmental review in the supplemental analysis. The proposed project would have **No Impact** relative to this topic.

***XIX. UTILITIES AND SERVICE SYSTEMS***

<b><i>Would the project:</i></b>	<b><i>Potentially Significant Impact</i></b>	<b><i>Less Than Significant with Mitigation Incorporation</i></b>	<b><i>Less Than Significant Impact</i></b>	<b><i>No Impact</i></b>
a) Require or result in the relocation or construction of new or expanded water, wastewater or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation 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 a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the projects projected demand in addition to the providers 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

***Responses to Checklist Questions***

**Responses a-c):** This CEQA topic has been adequately analyzed in the certified EIR for the General Plan and Development Code Update (State Clearinghouse No. 2012061069) pursuant to applicable legal standards. CEQA Guidelines Section 15162 states that a supplemental analysis must be prepared for a project if there is new information of substantial importance that was not known or could not have been known at the time the previous EIR was certified. The City's desire to update City policy in the Circulation Element to meet state law related to SB 743 qualifies as new information of substantial importance not known at the time the previous EIR was certified.

CEQA Guidelines Section 15168 provides that the focus of a supplemental analysis on new information can be narrowly on new effects, which had not been considered before, and that if there are no effects on a topic beyond those disclosed in the certified EIR, no further environmental review of that topic would be required.

The City's policy changes will narrowly affect circulation and transportation topics, but will not have a direct or indirect effect on this CEQA topic. Instead, the City's policy changes would result in no anticipated environmental changes to this CEQA topic when compared to the environmental effects discussed under the certified EIR. As such, this CEQA topic has been adequately analyzed in the certified EIR pursuant to applicable legal standards, and does not warrant further environmental review in the supplemental analysis. The proposed project would have ***No Impact*** relative to this topic.

**XX. WILDFIRE**

<b>Would the project:</b>	<b>Potentially Significant Impact</b>	<b>Less Than Significant with Mitigation Incorporation</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
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?				X
d) 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?				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 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

**Responses to Checklist Questions**

**Responses a-c):** This CEQA topic has been adequately analyzed in the certified EIR for the General Plan and Development Code Update (State Clearinghouse No. 2012061069) pursuant to applicable legal standards. CEQA Guidelines Section 15162 states that a supplemental analysis must be prepared for a project if there is new information of substantial importance that was not known or could not have been known at the time the previous EIR was certified. The City's desire to update City policy in the Circulation Element to meet state law related to SB 743 qualifies as new information of substantial importance not known at the time the previous EIR was certified.

CEQA Guidelines Section 15168 provides that the focus of a supplemental analysis on new information can be narrowly on new effects, which had not been considered before, and that if there are no effects on a topic beyond those disclosed in the certified EIR, no further environmental review of that topic would be required.

The City's policy changes will narrowly affect circulation and transportation topics, but will not have a direct or indirect effect on this CEQA topic. Instead, the City's policy changes would result in no anticipated environmental changes to this CEQA topic when compared to the environmental effects discussed under the certified EIR. As such, this CEQA topic has been adequately analyzed in the certified EIR pursuant to applicable legal standards, and does not warrant further environmental review in the supplemental analysis. The proposed project would have **No Impact** relative to this topic.

**XXI. MANDATORY FINDINGS OF SIGNIFICANCE**

	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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 that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	X			
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?				X

*Responses to Checklist Questions*

**Responses a and c):** This CEQA topic has been adequately analyzed in the certified EIR for the General Plan and Development Code Update (State Clearinghouse No. 2012061069) pursuant to applicable legal standards. CEQA Guidelines Section 15162 states that a supplemental analysis must be prepared for a project if there is new information of substantial importance that was not known or could not have been known at the time the previous EIR was certified. The City’s desire to update City policy in the Circulation Element to meet state law related to SB 743 qualifies as new information of substantial importance not known at the time the previous EIR was certified.

CEQA Guidelines Section 15168 provides that the focus of a supplemental analysis on new information can be narrowly on new effects, which had not been considered before, and that if there are no effects on a topic beyond those disclosed in the certified EIR, no further environmental review of that topic would be required.

The City’s policy changes will narrowly affect circulation and transportation topics, but will not have a direct or indirect effect on this CEQA topic. Instead, the City’s policy changes would result in no anticipated environmental changes to this CEQA topic when compared to the environmental effects discussed under the certified EIR. As such, this CEQA topic has been adequately analyzed in the certified EIR pursuant to applicable legal standards, and does not warrant further environmental review in the supplemental analysis. The proposed project would have **No Impact** relative to this topic.

**Response b):** It has been determined that there will be No Impact related to each CEQA topic except for Transportation, which requires additional environmental review. Transportation will be analyzed in the supplemental analysis pursuant to applicable legal standards, which will include an analysis for the potential for cumulatively considerable effects. A final significance determination will be made in the supplemental analysis after the detailed review is completed. All other CEQA topics do not warrant a cumulative analysis because the proposed project will not result in changes related to the topic.

## REFERENCES

City of Clovis. 2014. General Plan, City of Clovis (Adopted August 25, 2014).

City of Clovis. 2014. Draft Program Environmental Impact Report, Volume I: Draft PEIR and Appendix A, General Plan and Development Code Update, State Clearinghouse No. 2012061069. (Certified August 25, 2014).

City of Clovis. 2020. Interim Transportation Impact Analysis Guidelines.

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NOP COMMENTS

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## Joyce Roach

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**From:** Rick Fultz  
**Sent:** Tuesday, May 3, 2022 3:22 PM  
**To:** Joyce Roach  
**Subject:** RE: Notice of Preparation of a Focused Environmental Impact Report - 2014 Clovis General Plan Circulation Element

Hi Joyce,  
Forgot to send you a response. No fire comments on this project.  
Thanks

Rick Fultz  
Fire & Life Safety Analyst  
Clovis Fire Department  
Office (559)324-2214  
Cell (559) 696-0889  
[rickf@cityofclovis.com](mailto:rickf@cityofclovis.com)

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**From:** Joyce Roach <joycer@ci.clovis.ca.us>  
**Sent:** Monday, April 25, 2022 9:52 AM  
**To:** Amanda Castro <amcastro@fresnocountyca.gov>; Amjad M. Qader <amjadq@fresnofloodcontrol.org>; Amy Hance <AmyH@ci.clovis.ca.us>; Andrew Haussler <andrewh@ci.clovis.ca.us>; Andrew Nabors <AndrewNabors@clovisusd.k12.ca.us>; Andrew Nabors <andrewnabors@cusd.com>; Anthony Summers <Kristopher.W.Summers@usps.gov>; Arthur Negrete <arthurn@ci.clovis.ca.us>; Augustine Ramirez <auramirez@fresnocountyca.gov>; Bernard Jimenez <Bjimenez@co.fresno.ca.us>; Bill Fox <billf@ci.clovis.ca.us>; Manuel Barrios <manuelb@ci.clovis.ca.us>; Brian Weldon <bw1987@att.com>; Chad Fitzgerald <ChadF@ci.clovis.ca.us>; Cherie Clark <Cherie.Clark@valleyair.org>; Christopher Hutchison <christopherh@ci.clovis.ca.us>; Chris Motta <cmotta@co.fresno.ca.us>; Christian A. Esquivias Ramirez <ChristianE@ci.clovis.ca.us>; Claudia Cazares <claudiac@ci.clovis.ca.us>; Curt Fleming <curtff@ci.clovis.ca.us>; Dave Fey <dfey@co.fresno.ca.us>; Dave Padilla <dave.padilla@dot.ca.gov>; Dave Randall <drandall@co.fresno.ca.us>; Dave Scott <ds1298@att.com>; David Merchen <davidm@ci.clovis.ca.us>; Debbie Campbell <debbiec@fresnofloodcontrol.org>; Deep Sidhu <SSidhu@co.fresno.ca.us>; Denver Stairs <DenverStairs@cusd.com>; Douglas Stawarski <dougs@ci.clovis.ca.us>; Eduardo Martinez <eduardo\_martinez@sangerusd.net>; FID <Engr-Review@fresnoirrigation.com>; FMFCD <developmentreview@fresnofloodcontrol.org>; Garrett Rogers <garrettr@ci.clovis.ca.us>; Gene Abella <genea@ci.clovis.ca.us>; George Gonzalez <georgeg@ci.clovis.ca.us>; Gerald Conley <geraldc@ci.clovis.ca.us>; Glenn Allen <glallen@co.fresno.ca.us>; Glenn Eastes <glenne@ci.clovis.ca.us>; Holly Greathouse <hollyg@ci.clovis.ca.us>; Iri Guerra <IriG@ci.clovis.ca.us>; Ivette Rodriguez <ivetter@ci.clovis.ca.us>; Jason C. <jasonc@fresnofloodcontrol.org>; Jesse Newton <jessen@ci.clovis.ca.us>; Jesus Santillan <jesuss@ci.clovis.ca.us>; Joe Alexander <JoeA@ci.clovis.ca.us>; John Cross <JohnC@ci.clovis.ca.us>; John Holt <johnh@ci.clovis.ca.us>; Jonas Chanh <jonasc@ci.clovis.ca.us>; Jose Sandoval <joses@ci.clovis.ca.us>; Joyce Roach <joycer@ci.clovis.ca.us>; Katy Benham <KatyB@ci.clovis.ca.us>; Kelsey George <kelseyg@ci.clovis.ca.us>; Kevin Tsuda <KTsuda@co.fresno.ca.us>; Laura Tieman <LAT9@PGE.com>; Lily Cha <lilyc@ci.clovis.ca.us>; Luis Murrieta <LDMQ@pge.com>; Michael Maxwell <michaelm@fresnofloodcontrol.org>; Michael Navarro <michael\_navarro@dot.ca.gov>; Michelle Maldonado <michellem@ci.clovis.ca.us>; Mike Harrison <mikeh@ci.clovis.ca.us>; Mikel Meneses <mikelm@fresnofloodcontrol.org>; Nadia Lopez <nllopez@fresnocountyca.gov>; Nicholas Torstensen <nicholast@ci.clovis.ca.us>; Paul Armendariz <PaulA@ci.clovis.ca.us>; Renee Mathis <ReneeM@ci.clovis.ca.us>; Rick Fultz <rickf@ci.clovis.ca.us>; Ricky Caperton <rcaperton@ci.clovis.ca.us>; Robert J. Howard <R3Hd@pge.com>; Robert

Villalobos <robertv@fresnofloodcontrol.org>; Ryan Burnett <RyanB@ci.clovis.ca.us>; Ryan Kilby <ryan\_kilby@sangerusd.net>; Ryan Nelson <ryann@ci.clovis.ca.us>; Sarai Yanovsky <saraiy@ci.clovis.ca.us>; Scott Redelfs <scottr@ci.clovis.ca.us>; Sean Smith <SeanS@ci.clovis.ca.us>; Shawn Miller <ShawnM@ci.clovis.ca.us>; SJVAPCD <CEQA@valleyair.org>; Vincent Mendes <vmendes@fresnocountyca.gov>; Wildlife CEQA <R4CEQA@wildlife.ca.gov>  
**Cc:** Ricky Caperton <rcaperton@ci.clovis.ca.us>; Joyce Roach <joycer@ci.clovis.ca.us>

**Subject:** Notice of Preparation of a Focused Environmental Impact Report - 2014 Clovis General Plan Circulation Element

Greetings,

The City of Clovis (City) is the lead agency responsible for preparation of a Focused Environmental Impact Report (Focused EIR) related to a technical update to the Circulation Element of the 2014 Clovis General Plan. The purpose of the technical update is to incorporate Vehicle Miles Traveled (VMT) related goals and policies in the City's efforts to comply with Senate Bill 743 (SB743). Pursuant to provisions of the California Environmental Quality Act (CEQA), the City has prepared the attached Notice of Preparation (NOP) and Initial Study (IS) for the proposed project. The purpose of this NOP and IS is to provide agencies, interested parties, and organizations with sufficient information describing the proposed project and its potential environmental effects to enable meaningful input related to the scope and content of information to be included in the Focused EIR. **Please note that there will NOT be any land use changes as part of the technical update. The technical update is for the Circulation Element only and does NOT propose any changes to other elements of the 2014 Clovis General Plan.**

A public scoping meeting has been scheduled to inform interested parties about the proposed Specific Plan and provide the opportunity for comments on the scope and content of the EIR. The meeting time and location is as follows:

City of Clovis Council Chamber

1033 Fifth Street

Clovis, CA 93612

Date: Wednesday, April 27, 2022

Time: 5:30 pm to 6:30pm

Should you have any questions or require additional information, please contact me directly at 559-324-2347 or by email. Thank you.



**Ricky Caperton, AICP | Deputy City Planner**

City of Clovis | Planning Division  
1033 Fifth Street, Clovis, CA 93612  
p. 559.324.2347 | m. 559.593.5176  
[rcaperton@cityofclovis.com](mailto:rcaperton@cityofclovis.com)



**Jared Blumenfeld**  
Secretary for  
Environmental Protection



## Department of Toxic Substances Control

Meredith Williams, Ph.D.  
Director  
8800 Cal Center Drive  
Sacramento, California 95826-3200



**Gavin Newsom**  
Governor

### SENT VIA ELECTRONIC MAIL

April 18, 2022

Mr. Ricky Caperton, AICP  
Deputy City Planner  
City of Clovis Planning Division  
1033 Fifth Street  
Clovis, California 93612  
[RCaperton@cityofclovis.com](mailto:RCaperton@cityofclovis.com)

NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT FOR THE  
2014 CLOVIS GENERAL PLAN CIRCULATION ELEMENT UPDATE – DATED  
APRIL 4, 2022 (STATE CLEARINGHOUSE NUMBER: 2012061069)

Dear Mr. Caperton:

The Department of Toxic Substances Control (DTSC) received a Notice of Preparation of an Environmental Impact Report (EIR) for the 2014 Clovis General Plan Circulation Element Update (Project). The Lead Agency is receiving this notice from DTSC because the Project includes one or more of the following: groundbreaking activities, work in close proximity to a roadway, work in close proximity to mining or suspected mining or former mining activities, presence of site buildings that may require demolition or modifications, importation of backfill soil, and/or work on or in close proximity to an agricultural or former agricultural site.

DTSC recommends that the following issues be evaluated in the Hazards and Hazardous Materials section of the EIR:

1. The EIR should acknowledge the potential for historic or future activities on or near the project site to result in the release of hazardous wastes/substances on the project site. In instances in which releases have occurred or may occur, further studies should be carried out to delineate the nature and extent of the contamination, and the potential threat to public health and/or the environment should be evaluated. The EIR should also identify the mechanism(s) to initiate

any required investigation and/or remediation and the government agency who will be responsible for providing appropriate regulatory oversight.

2. Refiners in the United States started adding lead compounds to gasoline in the 1920s in order to boost octane levels and improve engine performance. This practice did not officially end until 1992 when lead was banned as a fuel additive in California. Tailpipe emissions from automobiles using leaded gasoline contained lead and resulted in aerially deposited lead (ADL) being deposited in and along roadways throughout the state. ADL-contaminated soils still exist along roadsides and medians and can also be found underneath some existing road surfaces due to past construction activities. Due to the potential for ADL-contaminated soil DTSC, recommends collecting soil samples for lead analysis prior to performing any intrusive activities for the project described in the EIR.
3. If any sites within the project area or sites located within the vicinity of the project have been used or are suspected of having been used for mining activities, proper investigation for mine waste should be discussed in the EIR. DTSC recommends that any project sites with current and/or former mining operations onsite or in the project site area should be evaluated for mine waste according to DTSC's 1998 [Abandoned Mine Land Mines Preliminary Assessment Handbook](#).
4. If buildings or other structures are to be demolished on any project sites included in the proposed project, surveys should be conducted for the presence of lead-based paints or products, mercury, asbestos containing materials, and polychlorinated biphenyl caulk. Removal, demolition and disposal of any of the above-mentioned chemicals should be conducted in compliance with California environmental regulations and policies. In addition, sampling near current and/or former buildings should be conducted in accordance with DTSC's 2006 [Interim Guidance Evaluation of School Sites with Potential Contamination from Lead Based Paint, Termiticides, and Electrical Transformers](#).
5. If any projects initiated as part of the proposed project require the importation of soil to backfill any excavated areas, proper sampling should be conducted to ensure that the imported soil is free of contamination. DTSC recommends the imported materials be characterized according to [DTSC's 2001 Information Advisory Clean Imported Fill Material](#).
6. If any sites included as part of the proposed project have been used for agricultural, weed abatement or related activities, proper investigation for organochlorinated pesticides should be discussed in the EIR. DTSC recommends the current and former agricultural lands be evaluated in

Mr. Ricky Caperton  
April 18, 2022  
Page 3

accordance with DTSC's 2008 [Interim Guidance for Sampling Agricultural Properties \(Third Revision\)](#).

DTSC appreciates the opportunity to comment on the EIR. Should you need any assistance with an environmental investigation, please visit DTSC's [Site Mitigation and Restoration Program](#) page to apply for lead agency oversight. Additional information regarding voluntary agreements with DTSC can be found at [DTSC's Brownfield website](#).

If you have any questions, please contact me at (916) 255-3710 or via email at [Gavin.McCreary@dtsc.ca.gov](mailto:Gavin.McCreary@dtsc.ca.gov).

Sincerely,

A handwritten signature in blue ink that reads "Gavin McCreary". The signature is written in a cursive style.

Gavin McCreary  
Project Manager  
Site Evaluation and Remediation Unit  
Site Mitigation and Restoration Program  
Department of Toxic Substances Control

cc: (via email)

Governor's Office of Planning and Research  
State Clearinghouse  
[State.Clearinghouse@opr.ca.gov](mailto:State.Clearinghouse@opr.ca.gov)

Mr. Dave Kereazis  
Office of Planning & Environmental Analysis  
Department of Toxic Substances Control  
[Dave.Kereazis@dtsc.ca.gov](mailto:Dave.Kereazis@dtsc.ca.gov)



# County of Fresno

DEPARTMENT OF PUBLIC WORKS AND PLANNING  
STEVEN E. WHITE, DIRECTOR

May 12, 2022

Ricky Caperton, Deputy City Planner  
Planning Division  
City of Clovis  
1033 Fifth Street  
Clovis, CA 93612

SUBJECT: Notice of Preparation of a Focused Environmental Impact Report - 2014 Clovis  
General Plan Circulation Element

Dear Ricky Caperton:

The County of Fresno appreciates the opportunity to review and comment on the subject project being reviewed by the City of Clovis. Staff's understanding is that the City of Clovis (City) is the lead agency responsible for preparation of a Focused Environmental Impact Report (Focused EIR) related to a technical update to the Circulation Element of the 2014 Clovis General Plan. The purpose of the technical update is to incorporate Vehicle Miles Traveled (VMT) related goals and policies in the City's efforts to comply with Senate Bill 743 (SB743).

I am providing the following excerpts of comments provided by our County of Fresno divisions, particularly as it relates to the proposed General Plan Circulation Element.

#### Design:

As mapped by the City of Clovis, two of the three Urban Centers are in alignment with County of Fresno's future prioritized trails. Trail prioritization can be found within the Fresno County Regional Trails Plan. Please review our planned facilities to ensure consistency between documents.

If you have any further questions regarding this matter, please contact Brian Spaunhurst at [BSpaunhurst@FresnoCountyCA.gov](mailto:BSpaunhurst@FresnoCountyCA.gov) or Gloria Hensley at [GHensley@FresnoCountyCA.gov](mailto:GHensley@FresnoCountyCA.gov).

#### Environmental Health:

Future projects have the potential to expose nearby residents to elevated noise levels through various activities and events. Consideration should be given to the noise elements of the City Municipal Code including mitigation measures from noise generating sources.

If you have any further questions regarding this matter, please contact Kevin Tsuda at [KTsuda@FresnoCountyCA.gov](mailto:KTsuda@FresnoCountyCA.gov) (559) 600-3271.

SUBJECT: The Home Place Project  
May 12, 2022  
Page 2

If you have any questions regarding the information described in this letter, please contact me at MParker@FresnoCountyCA.gov or (559) 600-9669.

Sincerely,



Marissa Parker, Planner  
Development Services and Capital Projects Division

DR:mp,cwm  
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**County of Fresno**  
DEPARTMENT OF PUBLIC HEALTH

May 4, 2022

Ricky Caperton, Deputy City Planner  
City of Clovis- Planning Division  
1033 Fifth Street  
Clovis, CA 93612

LU0021730  
2600

Dear Mr. Caperton:

**Subject:** Notice of Preparation  
**Project:** 2014 Clovis General Plan Circulation Element Update (SCH #2012061069)  
**Location:** City of Clovis (Citywide)

The Fresno County Department of Public Health, Environmental Health Division has completed a review of the Request for Comment for the proposed General Plan Update and offers the following comments for future consideration:

#### Hazards and Hazardous Materials

- Should any underground petroleum storage tank(s) be discovered during future construction activities, the applicant/property owner shall apply for and secure an Underground Storage Tank Removal Permit from the Fresno County Department of Public Health, Environmental Health Division. Contact the Fresno County Hazmat Compliance Program at (559) 600-3271 for more information.

#### Hydrology and Water Quality

- As a measure to protect groundwater, all water wells (not intended for use) and abandoned septic systems within the property shall be properly destroyed by an appropriately licensed contractor. Contact the Fresno County Department of Public Health, Water Surveillance Program at (559) 600-3357 for more information.

#### Noise

- Future projects have the potential to expose nearby residents to elevated noise levels through various activities and events. Consideration should be given to the noise elements of the City Municipal Code including mitigation measures from noise generating sources.

If I can be of further assistance, please contact me at (559) 600-3271.

*Promotion, preservation and protection of the community's health*

1221 Fulton Street / P. O. Box 11867, Fresno, CA 93775

(559) 600-3271 ☐ FAX (559) 455-4646

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Mr. Ricky Caperton  
May 4, 2022  
NOP 2014 Clovis General Plan  
Page 2 of 2

Reviewed By:

A handwritten signature in black ink that reads "Kevin Tsuda". The signature is written in a cursive, slightly slanted style.

Kevin Tsuda, R.E.H.S.  
Environmental Health Specialist  
Environmental Health Division

KT

Deep Sidhu- Environmental Health Division



## NATIVE AMERICAN HERITAGE COMMISSION

April 15, 2022

Ricky Caperton  
City of Clovis  
1033 Fifth Street  
Clovis, CA 93611

**Re: 2012061069, 2014 Clovis General Plan Circulation Element Project, Fresno County**

Dear Mr. Caperton:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit. 14, § 15064.5 (b) (CEQA Guidelines § 15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines § 15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

**Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.**

CHAIRPERSON  
**Laura Miranda**  
Luiseño

VICE CHAIRPERSON  
**Reginald Pagaling**  
Chumash

PARLIAMENTARIAN  
**Russell Attebery**  
Karuk

SECRETARY  
**Sara Dutschke**  
Miwok

COMMISSIONER  
**William Mungary**  
Paiute/White Mountain  
Apache

COMMISSIONER  
**Isaac Bojorquez**  
Ohlone-Costanoan

COMMISSIONER  
**Buffy McQuillen**  
Yokayo Pomo, Yuki,  
Nomlaki

COMMISSIONER  
**Wayne Nelson**  
Luiseño

COMMISSIONER  
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Kumeyaay

EXECUTIVE SECRETARY  
**Raymond C.  
Hitchcock**  
Miwok/Nisenan

NAHC HEADQUARTERS  
1550 Harbor Boulevard  
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California 95691  
(916) 373-3710  
[nahc@nahc.ca.gov](mailto:nahc@nahc.ca.gov)  
[NAHC.ca.gov](http://NAHC.ca.gov)

## AB 52

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

- 1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project:** Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:

  - a. A brief description of the project.
  - b. The lead agency contact information.
  - c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
  - d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).
- 2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report:** A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1(b)).

  - a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).
- 3. Mandatory Topics of Consultation If Requested by a Tribe:** The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:

  - a. Alternatives to the project.
  - b. Recommended mitigation measures.
  - c. Significant effects. (Pub. Resources Code §21080.3.2 (a)).
- 4. Discretionary Topics of Consultation:** The following topics are discretionary topics of consultation:

  - a. Type of environmental review necessary.
  - b. Significance of the tribal cultural resources.
  - c. Significance of the project's impacts on tribal cultural resources.
  - d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).
- 5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process:** With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).
- 6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document:** If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:

  - a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
  - b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

- 7. Conclusion of Consultation:** Consultation with a tribe shall be considered concluded when either of the following occurs:
- a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
  - b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).
- 8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document:** Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).
- 9. Required Consideration of Feasible Mitigation:** If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).
- 10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:**
- a. Avoidance and preservation of the resources in place, including, but not limited to:
    - i. Planning and construction to avoid the resources and protect the cultural and natural context.
    - ii. Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
  - b. Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
    - i. Protecting the cultural character and integrity of the resource.
    - ii. Protecting the traditional use of the resource.
    - iii. Protecting the confidentiality of the resource.
  - c. Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
  - d. Protecting the resource. (Pub. Resource Code §21084.3 (b)).
  - e. Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
  - f. Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).
- 11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource:** An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
- a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
  - b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
  - c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: [http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation\\_CalEPAPDF.pdf](http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf)

## SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: [https://www.opr.ca.gov/docs/09\\_14\\_05\\_Updated\\_Guidelines\\_922.pdf](https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf).

Some of SB 18's provisions include:

1. **Tribal Consultation:** If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. **No Statutory Time Limit on SB 18 Tribal Consultation.** There is no statutory time limit on SB 18 tribal consultation.
3. **Confidentiality:** Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. **Conclusion of SB 18 Tribal Consultation:** Consultation should be concluded at the point in which:
  - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
  - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>.

### NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center ([http://ohp.parks.ca.gov/?page\\_id=1068](http://ohp.parks.ca.gov/?page_id=1068)) for an archaeological records search. The records search will determine:
  - a. If part or all of the APE has been previously surveyed for cultural resources.
  - b. If any known cultural resources have already been recorded on or adjacent to the APE.
  - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
  - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
  - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
  - b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

3. Contact the NAHC for:
  - a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
  - b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.
  
4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
  - a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, §15064.5(f) (CEQA Guidelines §15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
  - b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
  - c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code §7050.5, Public Resources Code §5097.98, and Cal. Code Regs., tit. 14, §15064.5, subdivisions (d) and (e) (CEQA Guidelines §15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address:  
[Cameron.Vela@nahc.ca.gov](mailto:Cameron.Vela@nahc.ca.gov).

Sincerely,

*Cameron Vela*

Cameron Vela  
Cultural Resources Analyst

cc: State Clearinghouse



**Fresno Metropolitan Flood Control District**  
*Capturing Stormwater since 1956*

File 170.11  
400.11  
410.10

May 4, 2022

Ricky Caperton, AICP, Deputy City Planner  
City of Clovis Planning Division  
1033 Fifth Street  
Clovis, CA 93612

Dear Ricky,

**Notice of Preparation – 2014 Clovis General Plan Circulation Element Update**

The Fresno Metropolitan Flood Control District (District) has adopted storm drainage Master Plan systems for the areas located within the 2014 Clovis General Plan Circulation Element (Plan Area). These Master Plan systems are based on the previously adopted General and Specific Plan land uses commented by the District August 12, 2014.

The District offers the following comments specific to the review of the Plan Area:

1. Page 8 (Policy 1.7 – Narrow Streets) and Page 9 (Policy 3.1 – Traffic calming): The District recommends that the City include a provision for determining street conveyance capacity and an elevation of structures policy for narrow streets and streets with traffic calming curbs where tributary drainage areas are significant and may pose a threat to buildings/structures. In addition, narrow street policy should include and address provisions for utility placement.

Streets are an essential drainage element for the flow of surface waters to a storm drain inlet. The geometry (including width) is critical for surface flow during heavy or intense storm events. A wider street has a greater conveyance capacity and less conflict between the driving area and the inundated area. For instance, the standard 2-year design storm is to intercept water at the height or depth of the top of curb ( 6-inches deep). On a 40-foot wide street, the street crown and the top of curb are nearly equal, but the center of the street is generally visible. As a street is narrowed by four-feet, the full street would be inundated, including the crown. At this narrow width, the visibility of the pavement is gone, there is a loss of perception of water depth and a safe path of travel disappears.

**City of Clovis Planning Division**  
**Notice of Preparation –**  
**2014 Clovis General Plan Circulation Element Update**  
**May 4, 2022**  
**Page 2**

Narrow streets and reduced right-of-ways will allow higher development densities and traffic calming effects, however if the area subject to these modified standards has a storm drainage infrastructure that has already been constructed, the new street standards and increased development densities will have impacts on the parameters used to calculate runoff coefficients that determine the size of the storm drainage system. The existing storm drainage system cannot accommodate reduced right-of-ways if the City desires to maintain the current level of drainage service provided to the community.

The only means of mitigating the reduced conveyance capacity of narrower streets would be to lower the tributary area, extend the storm drainage system or accept a lower level of drainage service. The first two options are essentially impracticable and very expensive in existing developed areas. When large areas are tributary to a specific location, the narrower street geometry should not be approved. In all cases of reduced street widths, the street geometry should be analyzed to determine the flow carrying capacity in relation to the tributary area.

The District's drainage system is designed for a 2-year storm event. When storms exceed the capacity of the storm drainage pipeline collection system, water must be temporarily stored on the surface until the storm subsides and the collection system can remove the storm water. Narrower streets have less storage volume available in the public right-of-way, necessitating more private property flooding and a need for elevating structures to a greater height above the street in order to provide the same level of protection from flooding, especially if reduced building setbacks are considered.

An additional impact of narrower streets is the ability to provide adequate room within the street right-of-way for the various utilities and their future repair. The District recommends that all agencies and utility companies review where their utility's relative position would be within the narrower street and determine potential conflicts and consequences of the reduced clearances prior to the adoption of a narrow street policy.

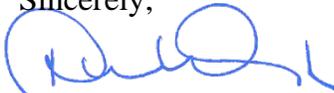
**City of Clovis Planning Division**  
**Notice of Preparation –**  
**2014 Clovis General Plan Circulation Element Update**  
**May 4, 2022**  
**Page 3**

2. Figure 5 Circulation Diagram: The plan indicates north-south streets from Tollhouse Road extending to properties to the north over the existing levee and through the flowage area of Big Dry Creek Reservoir. It should be noted and considered that in order to construct roads at these locations, they would have to be elevated to cross the levee as well as crossing the inflow floodplain without having a hydraulic effect on flood flows. This could mean construction of bridges of substantial length and/or modification of road alignments.
  
3. Figure 6 Bicycle and Trails System: While we understand City Parks designations on this figure may not be able to change at this time, we wish to point out that existing Basins “BX”, “4D”, and Big Dry Creek Reservoir should be removed as a city park designations. Basins “BX” and “4D” are not designated as dual use for parks. The potential secondary use for Big Dry Creek Reservoir has been discussed at a local level but would require federal approval from the U.S. Army Corps of Engineers.

In addition, the District would recommend identifying basin facilities that are dual use facilities for parks. Please see attached Figure 6 for reference.

Thank you for the opportunity to comment. If you have any questions or require further information, please do not hesitate to contact me at (559) 456-3292.

Sincerely,

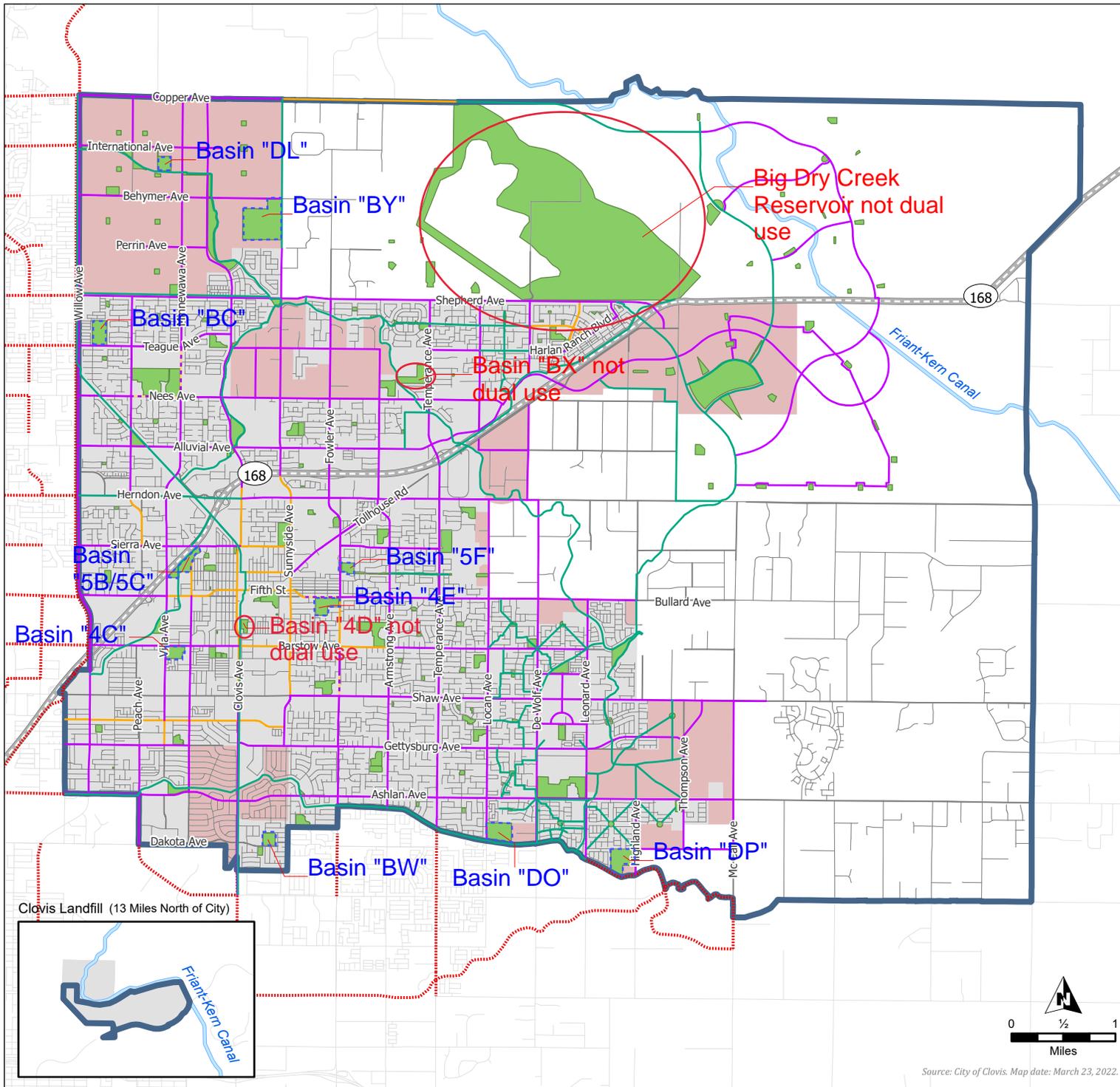


Denise Wade  
Master Plan and Special Projects Manager

DW/lrl

Attachment

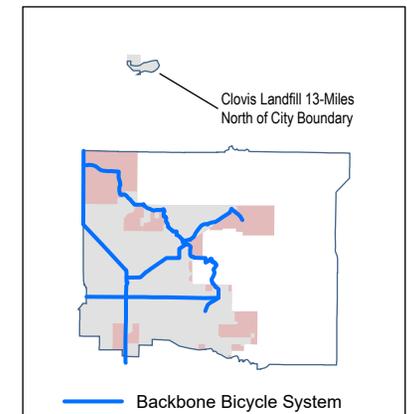
**Figure 6  
Bicycle and Trails System**



**LEGEND**

- Class I - Multipurpose Trail
- Class II - Bike Lane
- Class III - Bike Route
- - - Class II or III - Bikeway
- - - - - City of Fresno - Existing & Proposed Trail System
- Clovis City Limits
- Clovis Sphere of Influence
- Planning Area Boundary
- City Parks

  FMFCD Dual Use Basin Facilities



Source: City of Clovis. Map date: March 23, 2022.

## California Department of Transportation

DISTRICT 6 OFFICE  
1352 WEST OLIVE AVENUE | P.O. BOX 12616 | FRESNO, CA 93778-2616  
(559) 981-1041 | FAX (559) 488-4195 | TTY 711  
[www.dot.ca.gov](http://www.dot.ca.gov)



May 4, 2022

FRE  
IS – Initial Study  
NOP – 2014 Clovis General Plan Circulation Update  
<https://ld-igr-gts.dot.ca.gov/district/6/report/26354>

### **SENT VIA EMAIL**

Ricky Caperton  
Planning Division  
City of Clovis  
1033 Fifth Street  
Clovis, CA 93612

Dear Mr. Caperton:

Thank you for the opportunity to review the Notice of Preparation and Initial Study for the 2014 Clovis General Plan Circulation Element Update. The City of Clovis is preparing a focused update to its existing General Plan that concentrates on policy changes to the Circulation Element and does not change any other Element of the General Plan. This update does not affect land uses or development patterns and does not result in any physical development. The primary objectives are to update Circulation Element policies to meet the mandates of State law related to compliance with Senate Bill 743 (SB 743) and establish the City's Transportation Impact Analysis Guidelines policy.

Caltrans provides the following comments consistent with the State's smart mobility goals that support a vibrant economy and sustainable communities:

1. Page 9 of the Initial Study document includes the following policies:
  - a. Policy 2.7 – **VMT Mitigation Fee Program**. Evaluate the feasibility of a VMT mitigation fee program and explore opportunities for establishing an in-lieu mitigation fee to offset VMT impacts from development.
2. Caltrans concurs with policies that encourage agencies in considering the creation a VMT Mitigation Impact Fee to help reduce impacts on the State Highway System.
3. Page 11 and 12 of the Initial Study document includes the following policies:
  - a. Policy 8.2 – **Transit Routes**. As development occurs in the City's growth areas, continue to evaluate transit routes to determine the most efficient methods of

transporting people between residential neighborhoods and goods and services.

- b. Policy 8.3 – **Bicycle Lanes.** Partner with any local bicycle advocacy groups to improve the design, location, and functionality of bicycle lanes to encourage safe and efficient travel lanes.
  - c. Policy 8.4 – **Connectivity between residential and commercial.** Continue to explore opportunities for increased non-vehicular connectivity between new and existing residential development and commercial uses.
4. Caltrans concurs with policies that support multimodal transportation systems (such as bicycle and pedestrian facilities as well as public transportation) to provide connectivity of modes between the residential uses and commercial/retail uses to reduce VMT impacts from projects.
  5. Active Transportation Plans and Smart Growth efforts support the state's 2050 Climate goals. Caltrans supports reducing VMT and GHG emissions in ways that increase the likelihood people will use and benefit from a multimodal transportation network.

If you have any other questions, please call or email Christopher Xiong at (559) 908-7064 or [Christopher.Xiong@dot.ca.gov](mailto:Christopher.Xiong@dot.ca.gov).

Sincerely,



DAVID PADILLA, Branch Chief  
Transportation Planning – North



State of California – Natural Resources Agency  
DEPARTMENT OF FISH AND WILDLIFE  
Central Region  
1234 East Shaw Avenue  
Fresno, California 93710  
(559) 243-4005  
[www.wildlife.ca.gov](http://www.wildlife.ca.gov)

**GAVIN NEWSOM, Governor**  
**CHARLTON H. BONHAM, Director**



June 17, 2022

Ricky Caperton, AICP/Deputy City Planner  
City of Clovis, Planning Division  
1033 Fifth Street  
Clovis, California 93611  
[rcaperton@cityofclovis.com](mailto:rcaperton@cityofclovis.com)

**Subject: 2014 Clovis General Plan Circulation Element Update Project (Project)  
Notice of Preparation (NOP)  
SCH No.: 2012061069**

Dear Mr. Caperton:

The California Department of Fish and Wildlife (CDFW) received a NOP from the City of Clovis for the above-referenced Project pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.<sup>1</sup>

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, CDFW appreciates the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under Fish and Game Code. While the comment period may have ended, CDFW would appreciate if you will still consider our comments.

## **CDFW ROLE**

CDFW is California's **Trustee Agency** for fish and wildlife resources and holds those resources in trust by statute for all the people of the State (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a)). CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (*Id.*, § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

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<sup>1</sup> CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

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CDFW is also submitting comments as a **Responsible Agency** under CEQA (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's lake and streambed alteration regulatory authority (Fish & G. Code, § 1600 et seq.). Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), related authorization as provided by the Fish and Game Code will be required.

**Nesting Birds:** CDFW has jurisdiction over actions with potential to result in the disturbance or destruction of active nest sites or the unauthorized take of birds. Fish and Game Code sections that protect birds, their eggs and nests include sections 3503 (regarding unlawful take, possession or needless destruction of the nest or eggs of any bird), 3503.5 (regarding the take, possession or destruction of any birds-of-prey or their nests or eggs), and 3513 (regarding unlawful take of any migratory nongame bird).

## PROJECT DESCRIPTION SUMMARY

**Proponent:** City of Clovis

**Objective:** The City of Clovis is preparing a focused update to its existing General Plan. The proposed Project concentrates on policy changes to the Circulation Element only, and does not change any other Element of the General Plan. The proposed Project also includes adoption of the Transportation Impact Analysis Guidelines, which are supportive of the Circulation Element. The focused General Plan Update does not affect land uses or development patterns, and does not result in any physical development. The key components of the focused General Plan Update include revisions to the goals and policies in the Circulation Element.

**Location:** The City of Clovis (City) is in the central portion of Fresno County, approximately 6.5-miles northeast of the City of Fresno downtown area. The City is surrounded by portions of unincorporated Fresno County to the north, east, and south and by the City of Fresno to the west and southwest.

At the local level, the Plan Area is generally bounded by Copper Avenue on the north, Willow Avenue on the west, Academy Avenue on the east, and Shields Avenue on the south. State Route 168 (SR-168) bisects the City from the southwest to the northeast.

**Timeframe:** None given.

## COMMENTS AND RECOMMENDATIONS

The NOP indicates that the Environmental Impact Report (EIR) for the Project will consider potential environmental effects of the proposed Project to determine the level of significance of the environmental effect, and will analyze these potential effects to the detail necessary

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to make a determination on the level of significance. The EIR will also identify and evaluate alternatives to the proposed project.

When an EIR is prepared, the specifics of mitigation measures may be deferred, provided the lead agency commits to mitigation and establishes performance standards for implementation. Special-status plant and animal species have been documented in the Project area per the California Natural Diversity Database (CNDDDB), these include, but are not limited to, the State and Federally threatened California tiger salamander (*Ambystoma californiense*), the State endangered and Federally threatened San Joaquin adobe sunburst (*Pseudobahia peirsonii*), the State threatened Swainson's hawk (*Buteo swainsoni*), the State threatened tricolored blackbird (*Agelaius tricolor*), the State and Federally endangered Hartweg's golden sunburst (*Pseudobahia bahiifolia*) and California jewelflower (*Caulanthus californicus*), the State endangered and Federally threatened San Joaquin Valley Orcutt grass (*Orcuttia inaequalis*), the State endangered and Federally threatened succulent owl's clover (*Castilleja campestris var. succulenta*), the Federally threatened vernal pool fairy shrimp (*Branchinecta lynchi*), and the State species of special concern burrowing owl (*Athene cunicularia*), western pond turtle (*Actinemys marmorata*), American badger (*Taxidea taxus*) and western spadefoot toad (*Spea hammondi*). While this list may not include all special-status species present in or near the Project area, it does provide a robust source of information as to which species could potentially be impacted by vegetation and/or ground disturbance. CDFW recommends the EIR prepared for the Project analyze potential impacts to these species and provide measurable mitigation measures that, as needed, will reduce impacts to less than significant levels. More information on survey and monitoring protocols for sensitive species can be found at CDFW's website (<https://www.wildlife.ca.gov/Conservation/Survey-Protocols>).

CDFW also recommends consulting with the United States Fish and Wildlife Service (USFWS) on potential impacts to Federally listed species including, but not limited to, California tiger salamander, Hartweg's golden sunburst, succulent owl's clover, California jewelflower, and vernal pool invertebrates. Take under the Federal Endangered Species Act (FESA) is more broadly defined than CESA; take under FESA also includes significant habitat modification or degradation that could result in death or injury to a listed species by interfering with essential behavioral patterns such as breeding, foraging, or nesting. Consultation with the USFWS in order to comply with FESA is advised well in advance of any ground disturbing activities.

In addition to potential species impacts, it is likely that some Project activities that will be subject to CDFW's regulatory authority pursuant Fish and Game Code section 1600 et seq. If a Lake or Streambed Alteration Agreement (LSAA) is needed, CDFW is required to comply with CEQA in the issuance or the renewal of a LSAA. Therefore, for efficiency in environmental compliance, we recommend that any potential lake or stream disturbance that may result from Project activities be described, and mitigation for the disturbance be developed as part of the EIR. This will reduce the need for the Department to require extensive additional environmental review for a LSAA in the future. If inadequate, or no environmental review, has occurred, for the Project activities that are subject to notification

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under Fish and Game Code section 1602, CDFW will not be able to issue the Final LSAA until CEQA analysis for the project is complete. This may lead to considerable Project delays. Waterways present within the City of Clovis General Plan Update boundary include, but may not be limited to, Dog Creek, the Friant/Kern Canal, Dry Creek, and Enterprise Canal.

CDFW is available to meet with you ahead of DEIR preparation to discuss potential impacts and possible mitigation measures for some or all of the resources that may be analyzed in the EIR. If you have any questions, please contact Kelley Nelson, Environmental Scientist, at the address provided on this letterhead, by telephone at (559) 580-3194, or by electronic mail at [Kelley.Nelson@wildlife.ca.gov](mailto:Kelley.Nelson@wildlife.ca.gov).

Sincerely,

DocuSigned by:  
  
96D42C58E092466...

Valerie Cook  
Acting Regional Manager

cc: Regional Water Quality Control Board  
Central Valley Region  
1685 "E" Street  
Fresno, California 93706-2020

United States Army Corps of Engineers  
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## **LITERATURE CITED**

California Department of Fish and Wildlife. 2022. Biogeographic Information and Observation System (BIOS). <https://www.wildlife.ca.gov/Data/BIOS>.