Notice of Intent to Adopt
A Mitigated Negative Declaration

E201610000013

City of Reedley

Pursuant to the State of California Public Resources Code Section 21092, this is to advise you that the City of Reedley has prepared an Initial Study of environmental impacts for the following project:

Project Title: City of Reedley 2015-2023 Housing Element Update

Project Description: The project is the adoption and implementation of the Reedley General Plan 2015-2023 Housing Element. The Housing Element is one of seven required elements of the General Plan. It addresses existing and future housing needs of persons of all economic segment groups, and serves as a tool for decision-makers and the public in understanding and meeting housing needs in Reedley. While the law does not require local governments to construct housing to meet identified needs, it does require that the community address housing needs in its discretionary planning actions by creating opportunities for housing in the land use plan and facilitating housing development through policy.

Project Location: The City of Reedley is located in the County of Fresno and is adjacent to unincorporated Fresno County land to the north, south, east, and west. Tulare County is located to the south of Reedley. State Highway 99 is located approximately 12 miles to the west and State Highway 180 is located approximately eight miles to the north of Reedley, providing regional access to the greater Central Valley.

Environmental Determination: Based on the findings of the Initial Study, the City has determined that the Reedley General Plan 2015-2023 Housing Element Update will not result in significant impacts to the environment with incorporation of regulatory requirements and potentially mitigation measures. Accordingly, the City intends to adopt a Mitigated Negative Declaration, pursuant to Section 21080(c) of the Public Resources Code.

None of the properties identified as locations for future housing in the Housing Element are included on the list of hazardous materials facilities, hazardous waste properties, or hazardous waste disposal sites enumerated under Section 65962.5 of the California Government Code (Cortese List).

Public Review/Public Comment Period: Copies of the proposed Mitigated Negative Declaration and Initial Study are available for public review at City of Reedley, Community Development Department, 1733 9th Street, Reedley, California 93654.

A 30-day public review period for the Mitigated Negative Declaration begins on January 7, 2016 and ends on February 6, 2016. If you would like to comment, please send written comments to:

Kevin Fabino, Director of Community Development
City of Reedley, Community Development Department
1733 9th Street
Reedley, California 93654
(559) 637-4200

Public Hearing: The City of Reedley Planning Commission is scheduled to consider the Mitigated Negative Declaration and proposed project at its regular Planning Commission meeting on **February 4, 2016** at 5:00 P.M., at City Hall at 1733 9th Street, Reedley, California.

FILED
JAN 06 2016
FRESNO COUNTY CLERK
By _____ DEPUTY

E201610000013

STATE OF CALIFORNIA - THE RESOURCES AGENCY
DEPARTMENT OF FISH AND GAME

ENVIRONMENTAL FILING FEE CASH RECEIPT

Receipt # E201610000013

Lead Agency: CITY OF REEDLEY Date: 01/06/2016

County Agency of Filing: FRESNO COUNTY CLERK Document No: E201610000013

Project Title: CITY OF REEDLEY 2015-2023 HOUSING ELEMENT UPDATE

Project Applicant Name: CITY OF REEDLEY Phone Number: (559) 637-4200

Project Applicant Address: 1733 9TH STREET, REEDLEY, CA 93654

Project Applicant: LOCAL PUBLIC AGENCY

ADMINISTRATION FEE	$	50.00
NOTICE OF INTENT	$	0.00
Total Received	$	**50.00**

Signature and title of person receiving payment: Keeper

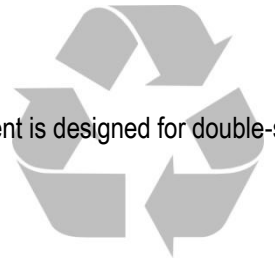
City of Reedley
Housing Element
2015-2023

Initial Study
Negative Declaration

Lead Agency
City of Reedley
1733 9th Street
Reedley, California 93654

Consultant
MIG
537 S. Raymond Avenue
Pasadena, California 91101

December 2015



This document is designed for double-sided printing

Table of Contents

List of Tables

List of Exhibits

1 PURPOSE AND AUTHORITY

The purpose of this Initial Study is to identify and assess the significance of the physical effects on the environment due to potential future development guided by the goals and policies of the City of Reedley portion of the 2015-2023 Multi-Jurisdictional Housing Element. Pursuant to the California Environmental Quality Act (CEQA), the proposed Housing Element is considered a "Project" and thus requires analysis and determination of environmental effects prior to approval.

This Initial Study has been prepared in accordance with the California Environmental Quality Act (CEQA) Statutes and Guidelines and the City of Reedley local rules and regulations. The proposed project requires discretionary approval by the City of Reedley and review by the California Department of Housing and Community Development (HCD). As the project initiator, and because of the legislative approvals involved, the City of Reedley is the Lead Agency with respect to this Initial Study pursuant to §15367 of the CEQA Guidelines. Specifically, the Project requires City of Reedley approval of a General Plan Amendment No. 2015-1. No other governmental agencies have discretionary permitting authority with respect to approval of the proposed project, and no Trustee Agencies, as defined in §21070 of the CEQA Statutes, has jurisdiction over resources such that Trustee agency approval is required for entitlement approval.

Pursuant to §15074 of the CEQA Guidelines, prior to approving the Project, the City of Reedley is obligated to consider the findings of this Initial Study and to either adopt a Negative Declaration (ND) or a Mitigated Negative Declaration (MND), or determine that an Environmental Impact Report (EIR) is required due to potentially significant, unavoidable environmental impacts. The findings of this Initial Study support adoption of Negative Declaration (ND), as discussed in Section 4. Either of these determinations indicate that the environmental impacts of the programs for accommodating housing pursuant to the Housing Element, in accordance with the governing land use planning policies and zoning standards, will be less than significant and that an EIR is not required.

CONTENTS

This document has been prepared to comply with Section 15063 of the State CEQA Guidelines that sets forth the required contents of an Initial Study. These include:

- A description of the project, including the location of the project (see Section 2)
- Identification of the environmental setting (see Section 2.11)
- Identification of environmental effects by use of a checklist, matrix, or other methods, provided that entries on the checklist or other form are briefly explained to indicate that there is some evidence to support the entries (see Section 3)
- Examination of whether the project is compatible with existing zoning, plans, and other applicable land use controls (see Sections 2.6 and 2.7)
- The name(s) of the person(s) who prepared or participated in the preparation of the Initial Study (see Section 5.1)

TIERING

Section 15152 et al of the CEQA Guidelines describes "tiering" as a streamlining tool as follows:

(a) "Tiering" refers to using the analysis of general matters contained in a broader EIR (such as one prepared for a general plan or policy statement) with later EIRs and negative declarations on narrower projects; incorporating by reference the general discussions from the broader EIR; and concentrating the later EIR or negative declaration solely on the issues specific to the later project.

(b) Agencies are encouraged to tier the environmental analyses which they prepare for separate but related projects including general plans, zoning changes, and development projects. This approach can eliminate repetitive discussions of the same issues and focus the later EIR or negative declaration on the actual issues ripe for decision at each level of environmental review. Tiering is appropriate when the sequence of analysis is from an EIR prepared for a general plan,

policy, or program to an EIR or negative declaration for another plan, policy, or program of lesser scope, or to a site-specific EIR or negative declaration. Tiering does not excuse the lead agency from adequately analyzing reasonably foreseeable significant environmental effects of the project and does not justify deferring such analysis to a later tier EIR or negative declaration. However, the level of detail contained in a first tier EIR need not be greater than that of the program, plan, policy, or ordinance being analyzed.

(c) Where a lead agency is using the tiering process in connection with an EIR for a large-scale planning approval, such as a general plan or component thereof (e.g., an area plan or community plan), the development of detailed, site-specific information may not be feasible but can be deferred, in many instances, until such time as the lead agency prepares a future environmental document in connection with a project of a more limited geographical scale, as long as deferral does not prevent adequate identification of significant effects of the planning approval at hand.

(d) Where an EIR has been prepared and certified for a program, plan, policy, or ordinance consistent with the requirements of this section, any lead agency for a later project pursuant to or consistent with the program, plan, policy, or ordinance should limit the EIR or negative declaration on the later project to affects which:

(1) Were not examined as significant effects on the environment in the prior EIR; or

(2) Are susceptible to substantial reduction or avoidance by the choice of specific revisions in the project, by the imposition of conditions, or other means.

(e) Tiering under this section shall be limited to situations where the project is consistent with the general plan and zoning of the city or county in which the project is located, except that a project requiring a rezone to achieve or maintain conformity with a general plan may be subject to tiering.

(f) A later EIR shall be required when the initial study or other analysis finds that the later project may cause significant effects on the environment that were not adequately addressed in the prior EIR. A negative declaration shall be required when the provisions of Section 15070 are met.

(1) Where a lead agency determines that a cumulative effect has been adequately addressed in the prior EIR that effect is not treated as significant for purposes of the later EIR or negative declaration, and need not be discussed in detail.

(2) When assessing whether there is a new significant cumulative effect, the lead agency shall consider whether the incremental effects of the project would be considerable when viewed in the context of past, present, and probable future projects. At this point, the question is not whether there is a significant cumulative impact, but whether the effects of the project are cumulatively considerable. For a discussion on how to assess whether project impacts are cumulatively considerable, see Section 15064(i).

(3) Significant environmental effects have been "adequately addressed" if the lead agency determines that:

(A) they have been mitigated or avoided as a result of the prior environmental impact report and findings adopted in connection with that prior environmental report; or

(B) they have been examined at a sufficient level of detail in the prior environmental impact report to enable those effects to be mitigated or avoided by site specific revisions, the imposition of conditions, or by other means in connection with the approval of the later project.

(g) When tiering is used, the later EIRs or negative declarations shall refer to the prior EIR and state where a copy of the prior EIR may be examined. The later EIR or negative declaration should state that the lead agency is using the tiering concept and that it is being tiered with the earlier EIR.

(h) There are various types of EIRs that may be used in a tiering situation. These include, but are not limited to, the following:

(1) General Plan EIR (Section 15166)

(2) Staged EIR (Section 15167)

(3) Program EIR (Section 15168)

(4) Master EIR (Section 15175)

(5) Multiple-family residential development/residential and commercial or retail mixed-use development (Section 15179.5)

(6) Redevelopment project (Section 15180)

(7) Projects consistent with community plan, general plan, or zoning (Section 15183)

This Initial Study for the 2015-2023 Housing Element has been prepared to tier from the General Plan EIR of the City of Reedley, as amended or otherwise supplemented. For the City of Reedley, documents by which the analysis recorded herein has been tiered from are available for public review at:

City of Reedley
1733 9th Street
Reedley, California 93654

ANALYTICAL APPROACH

The environmental analysis contained in this Initial Study is based on the following assumptions:

General Plan Consistency: As the General Plan is updated and/or amended, the City of Reedley will ensure that such updates and amendments do not prevent implementation of the policies contained in the update Housing Element.

Categorical Exemptions: Smaller-scale ministerial projects that require issuance of building permits without need for discretionary action are generally exempt from environmental review pursuant to CEQA in the absence of compelling evidence that the project is unique in that it may result in significant individual and/or cumulative impacts. Smaller-scale projects may be exempt from CEQA and require no further analysis. Exempt projects are considered to have no significant impact on the environment, as defined in Section 15300 of the CEQA Guidelines.

Project Specific Environmental Review: Future development proposals not exempt from CEQA will be subject to the environmental review process to identify potential impacts and impose appropriate mitigation measures, if needed, to avoid significant impacts.

Purpose of Environmental Review: The proposed Housing Element does not authorize any plan for construction of new homes or other uses or the redevelopment of any properties within the local jurisdiction. No direct environmental impacts, therefore, will occur as a result of adoption of the Housing Element. This Initial Study assesses the potential programmatic level environmental impacts resulting from potential development facilitated by the Housing Element in accordance with the Lead agency's existing land use policies.

No changes to the use, density or intensity, or other land use policies are proposed as part of the Housing Element.

The purpose of the environmental analysis conducted for the Housing Element, as documented herein, is to determine general impacts that could result from implementation of the Housing Element. The analysis is based on a hypothetical development scenario for the Inventory Sites identified in the Housing Element and how construction and operation of those sites may result in impacts to the environment. Because this is a program-level analysis, some measure of forecast and assumption is necessary in order to characterize potential development scenarios and should not be construed as speculative or unreasonable. Therefore, the program-level analysis of the potential impacts of the Housing Element is inherently broad and typically qualitative due to the lack of project-level information.

2 PROJECT DESCRIPTION

PROJECT TITLE

City of Reedley 2015-2023 Housing Element (General Plan Application No. 2015-1)

LEAD AGENCY/PROJECT SPONSOR NAME AND ADDRESS

City of Reedley
1733 9th Street
Reedley, California 93654

CONTACT PERSON AND PHONE NUMBER

Kevin Fabino, Director, Community Development Department
559-637-4200, ext. 286
Kevin.Fabino@reedley.ca.gov

PROJECT LOCATION

The 2015-2023 Multi-Jurisdictional Housing Element applies to all proposed and existing residential and mixed-use General Plan land use designations and zoning districts that support residential or mixed-use development within the municipal boundaries of the City of Reedley. The City of Reedley is located in the County of Fresno and is adjacent to unincorporated Fresno County land to the north, south, east, and west. Tulare County is located to the south of Reedley. State Highway 99 is located approximately 12 miles to the west and State Highway 180 is located approximately eight miles to the north of Reedley, providing regional access to the greater Central Valley. The Planning Area, for purposes of this environmental analysis, encompasses the entirety of the municipal boundaries of the City of Reedley. The Planning Area is approximately 7,913 acres, representing approximately less than one percent of the land area of the County of Fresno. The Inventory Sites identified in the Housing Element are located throughout the city with residentially zoned sites located near the northern, northeastern, southern, and western boundaries of the city. Sites zoned for mixed use are primarily located in the west and central portions of the city along I Street and H Street. Exhibit 1 (Regional Location and Vicinity Map) illustrates the City's location within the County of Fresno and its local context in terms of roadways, other transportation infrastructure, and important landmarks.

GENERAL PLAN DESIGNATIONS

The existing residential and mixed-use General Plan land use designations that support housing development within the City of Reedley are summarized in Table 1 (Residential and Mixed-Use Land Uses).[1] The proposed Housing Element concluded that the City's General Plan provides for a range of housing densities in the community; therefore, new land use designations to support development options for balanced housing will not be required.

[1] City of Reedley. General Plan. Land Use Element. February 2014

Table 1
Residential and Mixed-Use Land Uses

Land Use Designation	Supported Uses	Maximum Density (DU/AC)
Suburban Residential (SR)	Single-family detached	1.0 – 4.0
Low Density Residential (LDR)	Single-family detached	4.1 – 8.0
Medium Density Residential (MDR)	Single-family detached, multiple-family residential	8.1 – 15.0
High Density Residential (HDR)	Single-family detached	15.1 – 29.0
Central Downtown (CD)	Retail services, professional and government offices, and mixed-use	0.0 – 30.0
Neighborhood Commercial (NC)	Mix of retail and service-oriented uses	0.0 – 20.0
Source: City of Reedley. General Plan. Land Use Element. February 2014		

ZONING DISTRICTS

Existing zoning districts that support residential development are listed in Table 2 (Residential Zoning Districts) and include a summary of key development standards. The proposed Housing Element concluded that the City's Zoning Ordinance provides for a range of housing options and offers several opportunities for high-density residential and mixed-use development by right; therefore, new land use designations to support development options for balanced housing will not be required.

Table 2
Residential Zoning Districts

Zone	Permitted Residential Uses	Maximum Height (FT)	Minimum Lot Size (SF)	Minimum Lot Dimensions (FT)		Minimum Yard Setback (FT)			Density (DU/AC)
				Width	Depth	Front	Side	Rear	
RE	Agricultural, care facilities, bed and breakfast, single-family residential	40	30,000	175	150	40	20	20	1 – 4
R-1-12	Single-family residential	35	12,000	90	120	25	5	10	3.63
R-1-9	Single-family residential	35	9,000	70	100	25	5	10	4.84
R-1-7	Single-family residential	35	7,000	65	95	20	5	10	6.22
R-1-6	Single-family residential	35	6,000	60	90	20	5	10	7.26
RM-3	Multiple-family residential	35	6,000	50	100	15	5	5	14.52
RM-2	Multiple-family residential	35	6,000	50	100	15	5	5	21.78
PO*	Mixed use	N/A	N/A	50	100	15	5	5	8 – 15
C-AO*	Mixed-use	35	N/A	N/A	N/A	15	N/A	N/A	8 – 15
CN*	Mixed use	50	N/A	N/A	N/A	15	N/A	N/A	8 – 15
CC*	Mixed use	75	N/A	N/A	N/A	0	N/A	N/A	15 – 29
CS*	Mixed use	75	N/A	N/A	N/A	0	N/A	N/A	15 – 29
ML*	Mixed use (conditional)	75	4 Acres	N/A	N/A	10	N/A	N/A	20 +
Source: City of Reedley. Municipal Code, 2015									

CHARACTERISTICS OF THE HOUSING ELEMENT

The proposed project is the adoption and implementation of the City of Reedley 2015-2023 Housing Element (Project). California Housing Element law requires every jurisdiction in the state to prepare and adopt a housing element as part of its general plan. It is typical for each city or county to prepare and maintain its own separate general plan and housing element; however, the Fresno Council of Governments (COG) is coordinating the County of Fresno and twelve of its 15 incorporated cities in preparing a multi-jurisdictional housing element for the fifth round of housing element updates. The Project provides an opportunity for countywide housing issues and needs to be more effectively addressed comprehensively at the regional level as opposed to individually, and without coordination, at the local level. This approach provides the opportunity for the local governments and the County to work together in accommodating the Regional Housing Needs Allocation (RHNA) assigned to the Fresno County region. The Housing Element for the City has been prepared using the information and collaboration developed through this multi-jurisdictional effort.

HOUSING ELEMENT

A Housing Element is one of seven required elements of a jurisdiction's General Plan. It addresses the existing and future housing needs of persons from all economic backgrounds and serves as a tool for decision-makers and the public in understanding and meeting housing needs in the local jurisdiction. The law does not require local governments to construct housing to meet those needs. State law mandates that the community address housing needs in its discretionary planning actions by creating opportunities for housing and facilitating balanced housing development through policy.

STATUTORY REQUIREMENTS

State law requires that all housing elements address four key topics: 1) housing needs, 2) constraints to housing development, 3) housing resources, and 4) a preparation of a housing plan. Analysis of these topics provides the foundation for the preparation of a housing element. Article 10.6, Section 65580 – 65589.8, Chapter 3 of Division 1 of Title 7 of the California Government Code establishes the legal requirements for a housing element and encourages the provision of affordable and decent housing, in suitable living environments, in all communities, in working toward statewide goals. The 2015-2023 Multi-Jurisdictional Housing Element will become the policy document in the City of Reedley that will address current and projected housing needs within its jurisdiction, in relationship to the other participating jurisdictions. The Element identifies housing goals and policies to meet the broad, diverse housing needs at the regional level coupled with the programs and availability of land at the local level to implement the plan and reach those goals.

HOUSING NEEDS

Several factors influence the demand for housing in the County of Fresno and the 15 cities in the County that includes 1) housing needs resulting from population growth, 2) housing needs resulting from the overcrowding of existing housing units, 3) housing needs that result when households are paying more than they can afford for housing, and 4) housing needs of "special needs groups" that include the elderly, large families, female-headed households, households with a physically or developmentally disabled person, farm workers, and the homeless.

The 2015-2023 Multi-Jurisdictional Housing Element examines the housing needs of different groups of people based on demographic metrics that include owners versus renters, lower-income households, overcrowded households, elderly households, special needs groups, and homeless persons. This information is detailed in the Housing Element.

California housing element law requires that each city and county develop local housing programs designed to meet its "fair share" of housing needs for all income groups, based on projected population growth. The HCD Housing Policy Division develops Regional Housing Needs Assessments (RHNA) for each region of the state represented by councils of governments. Fresno COG determines the housing allocation amongst the 15 cities and unincorporated County areas in which the City of Reedley is located. Fresno COG has assigned the City of Reedley a housing allocation of 1,311 housing units for the 2015-2023 planning period. Table 3 (Regional Housing Needs Assessment Allocation) identifies the projected housing needs for the 2015-2023 cycle.

Table 3
Regional Housing Needs Assessment Allocation

Income Group	Total Allocation (DU)	Income Group Ratio (%)
Extremely Low/Very Low	393	30
Low	204	16
Moderate	161	12
Above Moderate	553	42
Total	1,311	100
Source: FCOG 2015		

Considering the RHNA is based on a January 1, 2013 baseline in projecting growth in the Planning Area and the region for the 2015 through 2023 cycle, jurisdictions may credit housing units developed, under construction, or approved since January 1, 2013 toward the units assigned through the RHNA. From January 1, 2013 to January 2015, 140 units were built or under construction. The housing units requested to be credited toward the jurisdiction's RHNA include affordable apartments as part of the Reedley Family Apartments Phase 1 and Phase 2 and the Kings River Commons development. The housing units credited toward the needs allocation currently have the following income distribution: five very low-income units, 124 low-income units, 10 moderate-income units, and one above moderate-income unit.

Projects that have received entitlement approvals or have been issued building permits but have not yet been constructed can also been credited toward the needs allocation. The City of Reedley approved the 341-unit Kings River Village in April 2015 and the 55-unit Trailside Terrace workforce housing project in December 2014. The housing units credited toward the needs allocation currently have the following income distribution: two extremely low-income units, 53 very low-income units, 87 low-income units, 190 moderate-income units, and 64 above moderate-income units.

The RHNA allocation in the City of Reedley after consideration of constructed units and entitled/permitted units for the 2015-2023 planning cycle is 775 units. The distribution of credited housing units and the allocation of this remaining housing need is summarized in Table 4 (RHNA Credits and Remaining Need).

Table 4
RHNA Credits and Remaining Need

Unit Type	AMI				
	0-50%	51-80%	81-120%	121%+	Total
Units Built or Under Construction					
Reedley Family Apartments Phase 1	5	32	10	1	48
Reedley Family Apartments Phase 2	--	32	--	--	32
Kings River Commons	--	60	--	--	60
Planned or Approved Projects					
Kings River Village	--	87	190	64	341
Trailside Terrace	55	--	--	--	55
RHNA Allocation	**393**	**204**	**161**	**553**	**1,311**
Credits	*60*	*211*	*200*	*65*	*536*
Remaining Need	**333**	**-7**	**-39**	**488**	**775**
Source: Mintier Harnish 2015					

HOUSING OPPORTUNITY AREAS

State law requires that jurisdictions demonstrate in the Housing Element that there is land inventory available and adequate in accommodating that jurisdiction's RHNA allocation. The City of Reedley has identified vacant residential sites, vacant mixed-use sites, and underutilized residential sites that are sufficient in accommodating the remaining needs allocation target of 775 units. No constraints have been identified in regard to these Inventory Sites that would prevent development, redevelopment, or reuse during the Housing Element period. The Inventory Sites are categorized and summarized herein.

Vacant Land Inventory

Identification of vacant residential and mixed-use sites is based on an analysis of the latest assessor's parcel information. The inventory of vacant residential and mixed-use land in the City of Reedley totals 363.05 acres. These vacant sites, identified in Table 5 (Vacant Land Inventory), have the potential to accommodate 3,729 units with applicable land use and zoning requirements such as consideration of parking, landscaping, and right-of-way requirements.

Underutilized Land Inventory

Vacant land is anticipated to be developed incrementally during the 2015-2023 life of the proposed Housing Element and will become scarcer as growth occurs in the City and throughout the region. Underutilized properties that may include commercial land has become a growing alternative to properties traditionally zoned for residential uses considering lot size, location, and the need for contemporary approaches to solving the issue of accommodating balanced housing. The underutilized sites included in the inventory have the highest potential for development within the planning period based on size, density, opportunities for consolidation, past market demand, and established regulatory incentives for development (see Table 6, Underutilized Land Inventory). The survey identified three parcels totaling 8.48 acres of developable land that could accommodate an estimated 92 dwelling units.

Table 5
Vacant Land Inventory

Land Use Designation	Zoning	Parcels	Density (DU/AC)	Acres	Development Estimate (DU)	AMI (%)
LDR	R-1-6	14	7.27	155.46	905	121 +
	R-1-SP	4		20.42	118	121 +
MDR	RM-2	1	15.0	1.79	21	81 – 120
	RM-3	1	14.52	15.72	183	81 – 120
HDR	RM-2	2	21.78	1.01	18	81 – 120
		8		20.84	362	0 - 80
	RM-SP	8		5.09	89	0 - 80
CC	CC	11	29.0	102.32	1,483	0 - 80
CD		11		8.31	121	0 – 80
O		2		2.75	40	0 – 80
CN	CN	7	15.0	10.4	124	81 – 120
P/IF	CC	3	29.0	2.05	30	0 - 80
	R-1-7	1	6.22	1.84	9	121 +
ML	LI	2	15.0	15.05	226	81 – 120
TOTAL		***75***	***--***	***363.05***	***3,729***	***--***

Source: Mintier Harnish 2015

Table 6
Underutilized Land Inventory

Land Use Designation	Zoning	Parcels	Density (DU/AC)	Acres	Development Estimate (DU)	AMI (%)
HDR	RM-2	3	21.78	8.48	92	0 – 80
	TOTAL	***3***	**--**	***8.48***	***92***	**--**
Source: Mintier Harnish 2015						

ADEQUACY OF INVENTORY SITES IN MEETING NEEDS ALLOCATION

The proposed Housing Element identifies a remaining need for 775 units after consideration of credits. The vacant land and underutilized land identified a combined capacity of 3,821 dwelling units, 2,217 of which include sites suitable for development of very low- to low-income housing. Based on the analysis provided in the Housing Element, the City of Reedley has sufficient land to accommodate the future housing needs projected for its jurisdiction. Table 7 (Land Inventory and Needs Comparison) summarizes the jurisdiction's housing needs in comparison to the development potential of vacant and underutilized land. The comparison identifies a surplus of 1,891 units for lower income groups and 611 units for moderate income groups.

Table 7
Land Inventory and Needs Comparison

	AMI				
	0-50%	**51-80%**	**81-120%**	**121%+**	**Total**
Units Built or Under Construction	5	124	10	1	140
Planned or Approved Projects	55	87	190	64	396
Capacity on Vacant Sites		2,125	572	1,032	3,729
Capacity on Underutilized Sites		92	--	--	92
Total Units		**2,488**	**772**	**1,097**	**4,357**
Housing Need	*393*	*204*	*161*	*553*	*1,311*
Surplus/Shortfall		**+1,891**	**+611**	**+544**	**+3,046**
Source: Mintier Harnish 2015					

PUBLIC AND UTILITY SERVICES

Future housing development will require the support of public services including fire, police, schools, and parks and recreation in addition to necessary utility services including water, sewer, and storm drainage. Public services and utilities serving the City of Reedley, as described in the General Plan EIR, are summarized herein.

- Fire Services: The Reedley Fire Department serves the Planning Area. The Fire Department operates out of a station located at 1060 D Street. The Fire Department has three full-time employees and a volunteer staff of approximately 40 people that are hired on a paid-per-call basis. The station maintains a pumper truck, a ladder truck, rescue vehicles, and other service vehicles and rescue watercraft. The typical response time is five to eight minutes. The Fire Department has tentative plans to construct new stations within the city; however, the location and timing of their construction is not known.
- Police Services: The Reedley City Police Department serves the area within the City jurisdiction and the County Sheriff serves the surrounding unincorporated areas. The Reedley Police Department operates out of a station located at 873 G Street. The Police Department is staffed by approximately 29 sworn officers which includes the chief, two lieutenants, seven sergeants, one corporal, 17 patrol officers, and two reserve officers. The Police Department also consists of non-sworn staff including one administrative assistant, six dispatchers, five community service officers, and three records specialists. The typical response time is three to five minutes. The Fresno County

Sheriff's Department provides service in the unincorporated areas of the County, which includes the Reedley Sphere of Influence.

- Schools: The Kings Canyon Unified School District provides kindergarten through 12th grade education for the Planning Area. The school district operates 19 schools which include five elementary schools, two K-8 schools, two middle schools, one high school, and four other education school facilities. The schools district anticipates the need for new construction at the elementary and high school level to accommodate anticipated growth.
- Parks and Recreation: The City plans for parkland needs based on a standard of a total of four acres of parkland per 1,000 residents. Currently, the City manages parklands that total approximately 2.75 acres of parkland per 1,000 residents.
- Water: One hundred percent of the City's water supply is groundwater pumped from the Kings Basin. The City operates seven active water wells and three water storage towers, and is planning to construct two additional water storage towers.
- Wastewater: The City operates the Reedley wastewater treatment plant (WWTP) located in the southwest portion of the City along the Kings River. The WWTP has a design capacity to treat seven million gallons per day (mgd).
- Storm Drains: The City maintains and services storm drains within the city. The city has 12 drainage zones, nine permanent ponding basins, underground storm drains, storm drain inlets, a drainage ditch, and a pump station. Storm drains carry water to one of the City's three ponding basins.

SURROUNDING LAND USES

The Inventory Sites identified in Exhibit 2 (Reedley Sites Inventory) are located throughout the City. In general, the City of Reedley is surrounded by agricultural land and rural residential land to the north, south, east, and west. Inventory Sites identified for single-family use are generally surrounded by single family residential uses and located near city boundaries. Inventory Sites identified for mixed-use development are generally centrally located within the city adjacent to limited industrial uses.

ENVIRONMENTAL SETTING

The City of Reedley is located in southern Fresno County in the central San Joaquin Valley portion of California, lying inland between the State's coastal mountain ranges and the Sierra Nevada Mountains. The jurisdiction encompasses approximately 12.36 square miles of land (7,913 gross acres) including its Sphere of Influence (SOI). State Highway 99 is located approximately 12 miles to the west and State Highway 180 is located approximately eight miles to the north of Reedley, providing regional access to the greater Central Valley. In addition to its location near these major highways, the San Joaquin Valley Railroad (SJVRR) rail line traverses through the western portion of the City in a southeast/northwest direction.

Situated in the central San Joaquin Valley, where the valley floor has rich agricultural production, Reedley's economy continues as predominantly based upon agricultural production and agriculturally-oriented industry.

The City is located in proximity to regional transportation routes, including State Highway 99 and State Highway 180. The Reedley Municipal Airport, a public use/general aviation facility, is located about two and one-third miles to the north. Unincorporated land under the jurisdiction of Fresno County surrounds the city. Surrounding land uses include land in agricultural production and low-density rural development.

The existing topography of the Planning Area is generally flat. Due to the relatively flat topography and geologic setting, few geologic hazards exist in the city other than those related to seismic activity. Storm water runoff drains generally in a westerly direction. The Kings River is adjacent to the western boundary of the city.

The City's municipal water supply is pumped from the Kings Basin. No imported water sources are available, and water supplies are limited to the watershed and underlying aquifer. Fresh groundwater is principally contained in the unconsolidated geological deposits at depths ranging from less than 100 to more than 3,000 feet.[2]

[2] City of Reedley. General Plan 2030 Draft Program Environmental Impact Report. January 8, 2013

Due to agricultural and urban development within the Planning Area, available wildlife and plant habitat in the San Joaquin Valley has been substantially reduced.

The City of Reedley is located in the San Joaquin Valley Air Basin, which is comprised of San Joaquin, Stanislaus, Merced, Madera, Fresno, Kings, Tulare, and parts of Kern County. Pollutants and cool air are generally trapped along the east side of the San Joaquin Valley due to circular air currents. Average temperatures in Fresno County vary from the high 90s (Fahrenheit) to lows in the mid 30s.

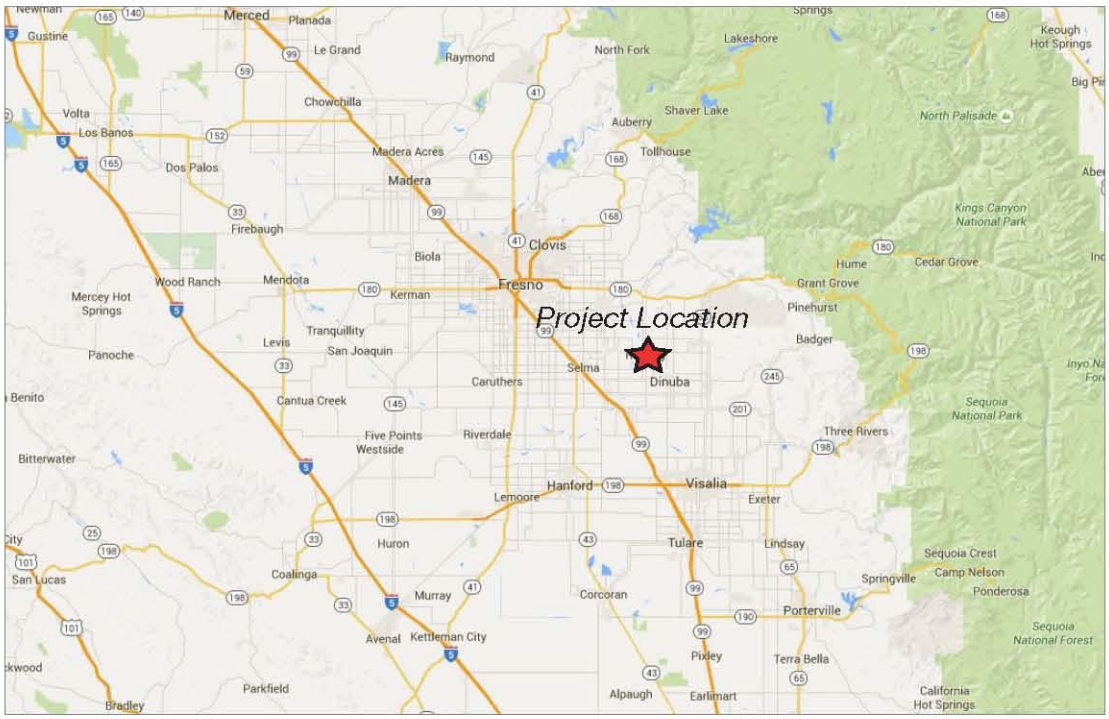
The main existing noise sources within Reedley include vehicular noise from arterials such as Reed Avenue, Manning Avenue, Frankwood Avenue, and I Street, and railroad noise from the San Joaquin Valley Railroad (SJVRR).

REQUIRED CITY APPROVALS

The City Council must approve a General Plan Amendment to incorporate the 2015-2023 Multi-Jurisdictional Housing Element into the General Plan.

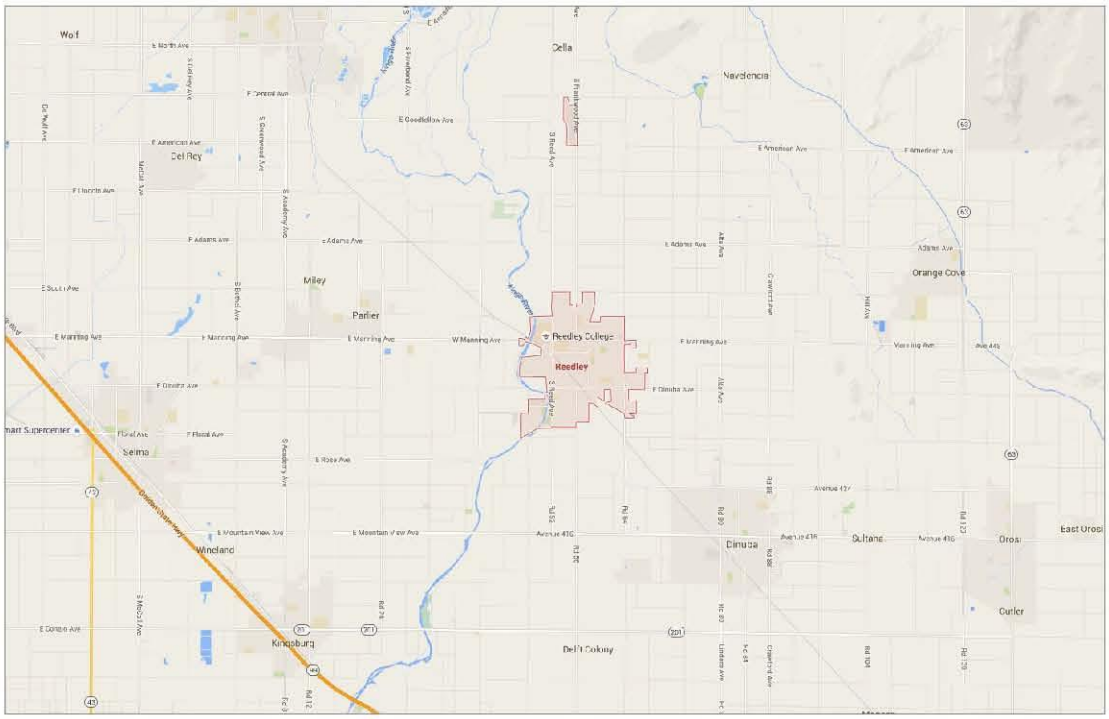
OTHER AGENCY APPROVALS

The State of California, Department of Housing and Community Development (HCD) is required to review the Housing Element for compliance with State law (Article 10.6 of the California Government Code) but does not have actual approval authority over the Project. No other jurisdiction has approval authority over any part of the Housing Element.



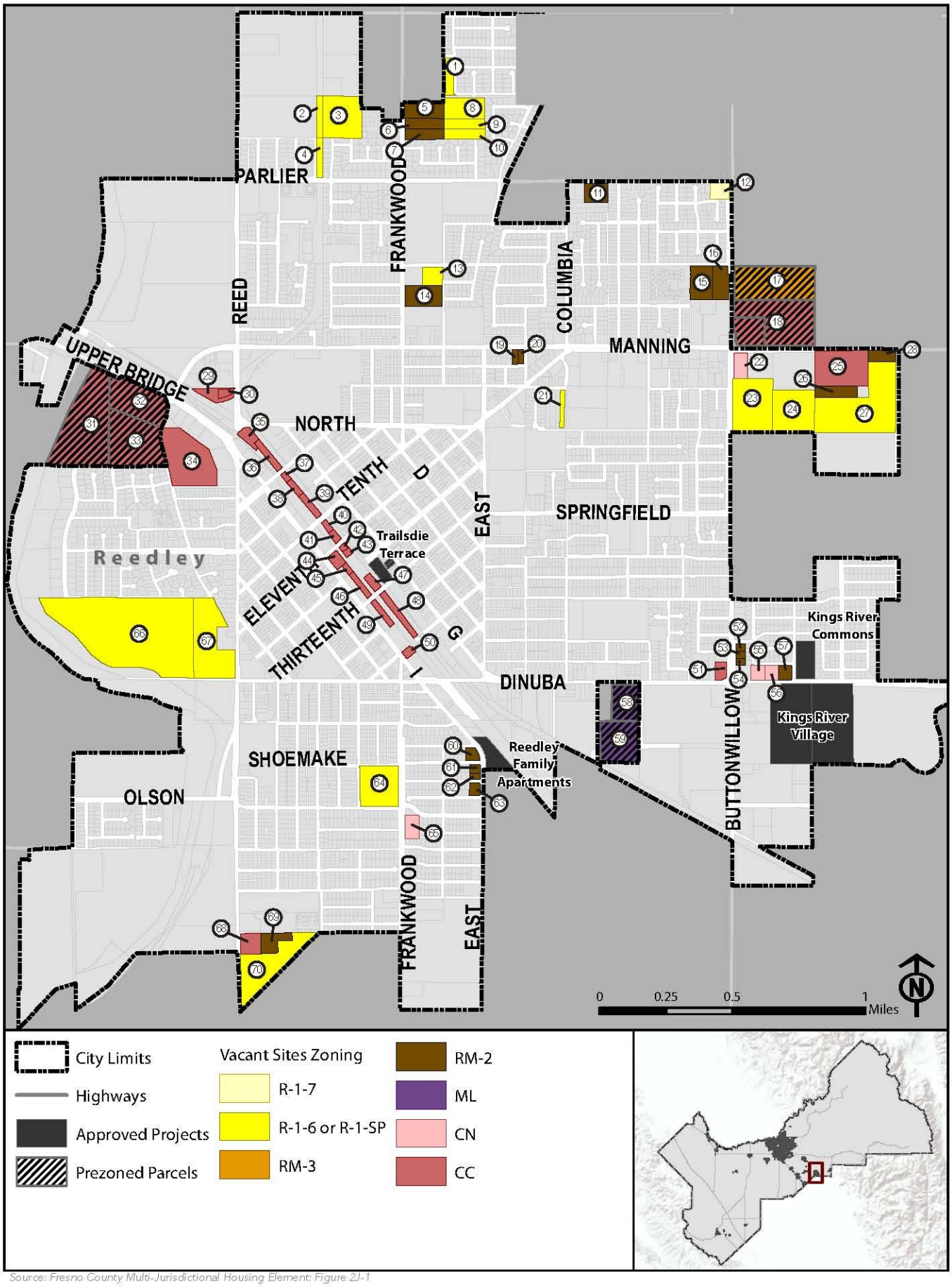
Source: Google Maps

Regional



Source: Google Maps

Vicinity



Source: Fresno County Multi-Jurisdictional Housing Element: Figure 2J-1

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

DETERMINATION

On the basis of this initial evaluation:

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

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

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

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

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

Kevin E. Fabino, Director
City of Reedley
Community Development Department

Date

1. AESTHETICS

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
A) Have a substantial adverse effect on a scenic vista or scenic highway?	☐	☐	☒	☐
B) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☒	☐
C) Substantially degrade the existing visual character or quality of the site and its surroundings?	☐	☐	☒	☐
D) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

A) **Less than Significant Impact**. According to the City of Reedley General Plan EIR, there are no scenic vistas or scenic highways within or in the vicinity of the Planning Area; however, views of surrounding agricultural lands, Sierra Nevada Mountains, and views within the Kings River Corridor could be considered aesthetically valuable. In addition, although there are designated scenic highways within Fresno County, there are three segments of Eligible State Scenic Highway within the county including State Route 180, which is located approximately seven miles north of the City of Reedley. According to the General Plan EIR, new development will incrementally reduce views to open agricultural land now available to residents and businesses within the city, but will also make such vistas available to residents and businesses in newly developing areas. The Inventory Sites are located throughout the city, with residential sites being located near the western, southern, eastern, and northern extents of the city. Views of surrounding agricultural land, the Sierra Mountains, and the Kings River Corridor may be impacted by future development of Inventory Sites; however, the Inventory Sites located near city boundaries will primarily support single- and multiple-family development with maximum heights of up to 40 feet.

The General Plan EIR found that impacts related to visual resources will be less than significant with implementation of General Plan Policies LU 2.5.1 through 2.5.12, which promotes the protection of agricultural land within the city's SOI until such time that the land is needed for development. Contiguous development within the SOI is also required, which will lead to orderly development of undeveloped properties closest to built-up areas. General Plan Policies COSP 4.2.2, requiring the maintenance of the scenic atmosphere of the river front area, and COSP 4.2.8, requiring the continued implementation of the Kings River Corridor Specific Plan, will ensure the conservation of visual resources associated with the Kings River Corridor. According to the General Plan EIR, the City's commitment to managing the scale and form of new development would ensure that views of the Sierra Nevada Mountains would continue to be available within the city. Impacts due to the potential loss of visual resources will be less than significant with implementation of existing General Plan policy.

B) **Less than Significant Impact**. Scenic resources are isolated, natural or manmade objects offering a unique visual display to the onlooker, in contrast to the expanse and variety of aesthetic values offered in scenic vistas. All of the Inventory Sites are currently undeveloped, natural or previously developed properties. Significant impacts could occur if the Housing Element update and potential development of the Inventory Sites substantially damaged scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway. According to the General Plan EIR, there are no

designated State scenic highways within Fresno County. Therefore, according to the General Plan EIR, implementation of the General Plan policies described above will reduce overall aesthetic impacts to less-than-significant levels.

The proposed Housing Element does not include any changes to the General Plan land use designations of the Inventory Sites. Thus, impacts associated with potential development of the proposed Inventory Sites will remain within the scope of analysis in the General Plan EIR. Future development of any individual Inventory Site will be subject to project-specific review pursuant to CEQA. Considering that the General Plan EIR analyzed impacts to scenic resources at the program level and concluded that impacts were less than significant, impact with adoption and implementation of the proposed Housing Element will be less than significant.

C) **Less than Significant Impact.** Visual character is the composite physical values of a structure or structures, in context of the built and/or natural environment, that include architectural treatment, landscaping, location, and the intangible qualities such as historical context or uniqueness that establish a thematic visual display for the onlooker when viewing the location. Above most environmental issues, defining visual character is generally subjective, relying on the opinion of the onlooker coupled with the expertise and institutional knowledge of the local jurisdiction to define the visual character of an area or property. Future development implemented through the policies of the Housing Element will have the effect of changing the visual character of each Inventory Site by introducing a new element to each location. The residential Inventory Sites are generally surrounded by single family residential uses that are one to two stories in height and mixed-use Inventory Sites are generally surrounded by commercial and limited industrial use. If the change in the visual character or quality of an Inventory Site, in context of the existing visual character and quality of the surrounding environment, can be perceived as 'degrading', then the effect of the project may result in potentially significant impacts. Similar to the impacts resulting from adverse changes to scenic values of vistas and isolate resources, adverse changes to the visual character of an area can reduce the quality of life for occupants and visitors of the area, reduce the uniqueness or singularity of the viewing experience, and/or reduce the historical and/or communal value of the visual setting.

There is no widely recognized threshold for determining when the effects of a project 'degrade' visual character or quality to the point that potentially significant environmental impacts could occur. The General Plan EIR utilized a qualitative threshold that will also be applied to the assessment of the Housing Element. Simply put, the General Plan EIR specifies that if a development proposal is found to be inconsistent with General Plan Policies and zoning regulations for the applicable neighborhood by the City, then the direct change in visual character on the project site and the indirect change to the neighborhood are considered potentially significant. The rationale behind this threshold is that General Plan Policies and zoning regulations were developed by the City to ensure new development is coherent with the existing character of the neighborhoods and of the appropriate form and appearance. General Plan Policies were developed to ensure that the location and rate of new development do not prematurely convert agricultural lands and open space, thereby protecting natural resources with high visual quality, and that the City's overall small-town character is preserved. Applying this threshold ensures that the subjectivity of assessing visual character is removed because the General Plan Policies and zoning regulations already reflect how neighborhoods within the city should look. Thus, future development on the Inventory Sites will be subject to applicable General Plan Policies and zoning regulations related to height, mass and scale, architectural style, materials, landscaping, and a variety of other standards that will ensure future housing development is consistent with the visual character intended for the area. Impacts due to changes to visual character or quality will be less than significant with implementation of existing regulations.

D) **Less than Significant Impact.** Future development guided by the implementation of the proposed Housing Element will result in new sources of light and glare. Outdoor lighting will be required in parking lots and pedestrian pathways for security purposes and may be included as accent lighting in landscaping and architectural features. Indoor lighting will also likely be visible through windows. Lighting associated with vehicle travel to and from the Inventory Sites will also be generated. Outdoor lighting when viewed at night can result in glare that can be defined as "excessive, uncontrolled brightness" from a luminaire, defined as "a complete lighting unit consisting of a lamp or lamps together with the parts designed to distribute the light, to position and protect the lamps and ballast (where applicable), and to connect the lamps to the power supply" by the National

Electrical Code (NEC).[3] [4] Glare can also occur during the day due to light reflecting off building materials such as highly polished metal and reflective glass. Inappropriate installation of light and reflective materials in future housing could result in effects on nighttime and daytime views through scattering excessive light in the viewers' eyes, causing a partial or complete inability to see due to light scattering in the eye. The effects of excessive light and glare can result in nuisance impacts ranging from viewer annoyance or an inability to see features in the night sky, to health and safety impacts such as temporary blindness while operating a motor vehicle.

Typical thresholds for determining if the effects of lighting and glare will impact surrounding properties is established in local code as a maximum illumination level at a project's property line, such as a maximum 0.5 footcandle at any property line adjacent to a residential property. The General Plan EIR uses a similar threshold. The General Plan EIR found that impacts related to light and glare will be less than significant with implementation of lighting requirements set forth in the General Plan and zoning regulations. Future housing developed to meet local and regional housing needs will be subject to Section 10-11-7 and Section 10-19-2 of the City's Municipal Code regulating the installation and operation of lighting. General Plan Policy COSP 4.8.7 requires that light levels not exceed state standards and prohibits continuous nighttime outdoor lighting in sports stadiums, construction sites, and rural areas unless required for security reasons. In addition, Reedley Municipal Code Section 10-11-7 (Use Permit Procedure) and Section 10-19-2 (Drawings to be Submitted) require that the location, height, and hooding devices be indicated on the site plan for review and approval by the building official. Implementation of the lighting requirements of the General Plan and Municipal Code will ensure that lighting is appropriately designed to provide necessary security while not creating undue nuisance or hazards for people at surrounding properties or on roadways in the vicinity of the Inventory Sites. Furthermore, future housing will be subject to standards enumerated in the code or other document, requiring review by staff or the architectural review board that will limit the use of metal in accent features, as opposed to primary architectural features, thereby minimizing the potential for daytime glare. Impacts to daytime and nighttime views will be less than significant with implementation of exiting regulatory requirements.

[3] Lighting Research Center. National Lighting Product Information Program. Lighting Answers: What is Glare? http://www.lrc.rpi.edu/programs/nlpip/lightinganswers/lightpollution/glare.asp [November 18, 2015]

[4] National Electrical Code. Article 100. 2014

2. AGRICULTURAL RESOURCES

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
A) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☒	☐
B) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☒	☐
C) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104 (g))?	☐	☐	☐	☒
D) Result in loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
E) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☒	☐

A) **Less than Significant Impact.** According to the state Farmland Mapping and Monitoring Program (FMMP), 2006 data show that the City of Reedley and its SOI has approximately 2,440 acres of Prime Farmland, 1,662 acres of Farmland of Statewide Importance, 78 acres of Unique Farmland, and 473 acres of Farmland of Local Importance. Nine parcels (Inventory Sites 15 through 18, 31 through 33, 66, and 67) of the Inventory Sites are located on farmland designated as Prime Farmland and Farmland of Statewide and Local Importance. Although nine Inventory Sites are designated as important farmland, significant impacts due its conversion to housing will be mitigated with implementation of General Plan Policies LU 2.5.1 through 2.5.12, which promotes the protection of agricultural land within the city's SOI until such time that the land is needed for development. Contiguous development within the SOI is also required, which will lead to orderly development of undeveloped properties closest to built-up areas. By managing growth into agricultural areas, use of agricultural land for agricultural purposes will remain viable until such time as land is developed for non-agricultural use. In addition, General Plan Policy COSP 4.3.2 requires a minimum 20-acre parcel size for agricultural land to encourage viable agriculture. Therefore, Inventory Sites of less than 20 acres in size are not considered suitable sites for viable agriculture. The General Plan EIR found that impacts related to the loss of important farmland will be significant and unavoidable. The proposed Housing Element does not propose the re-zoning or re-designation of any Inventory Sites and does not identify any site not analyzed in the General Plan EIR. In addition, the Housing Element does not propose any specific development that will result in the

conversion of farmland to non-agricultural use. Future development consistent with the proposed Housing Element will be subject to General Plan Policies related to the orderly development of undeveloped properties and will be subject to City review and approval. Therefore, implementation of the proposed Housing Element will not result in increased impacts as analyzed in the General Plan EIR. Impacts related to the conversion of important farmland will be less than significant.

B) **Less than Significant Impact**. According to the state Williamson Act Map, properties within the Planning Area are currently preserved for agricultural uses pursuant to Williamson Act contracts.[5] Inventory Sites 17, 18, 68, 69, and 70 are currently in Williamson Act contracts, for which non-renewal has been filed pursuant to Government Code Section 51245. These Inventory Sites will remain enrolled for the balance of the period remaining on the contract. The contract will expire at the end of the nine-year non-renewal period and the site will no longer be enforceably restricted. As discussed in the General Plan EIR, provided that these contracts have been terminated through non-renewal prior to the contracted land being developed, no conflict with Williamson Act contracts will occur. However, should Inventory Sites 17, 18, 68, 69, and 70 be developed before expiration of applicable Williamson Act contracts, impacts will be significant. As discussed above, General Plan Policies LU 2.5.1 through 2.5.12 will ensure that development of agricultural land will occur in an orderly manner while preserving agricultural uses until such time that the land is developed. In addition, General Plan Policy COSP 4.3.2 requires a minimum 20-acre parcel size for agricultural land to encourage viable agriculture. Therefore, Inventory Sites of less than 20 acres in size are not considered suitable sites for viable agriculture.

The General Plan EIR found that impacts related to the loss of land under Williamson Act contract will be significant and unavoidable. The proposed Housing Element does not propose the re-zoning or re-designation of any Inventory Sites and does not identify any site not analyzed in the General Plan EIR. In addition, the Inventory Sites under Williamson Act contracts have been filed for non-renewal. Future development proposed after expiration of the applicable Williamson Act contract will be less than significant. Future development consistent with the proposed Housing Element will be subject to General Plan Policies related to the orderly development of undeveloped properties and will be subject to City review and approval. Therefore, implementation of the proposed Housing Element will not result in increased impacts as analyzed in the General Plan EIR. Impacts related to the loss of land under Williamson Act contract will be less than significant.

C-D) **No Impact.** Public Resources Code Section 12220(g) identifies forest land as 'land that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits.' There is no forest land located on or in the vicinity of any proposed Inventory Sites. Forest land, regardless of its productive capabilities or management potential as a resource, is important to the regional and global environment. Forests provide watershed stability, wildlife shelter and habitat, oxygen, soil nutrients, and carbon dioxide sinks, serving as a multi-faceted and integral part of the broader ecosystem. Considering that the proposed Housing Element will not result in direct loss or substantial changes to the National Forest of Forests, no impacts will result.

E) **Less than Significant Impact.** As discussed above, there is no forest land within the Planning Area or on the Inventory Sites. However, important farmland and/or Williamson Act Contracted properties are located within or in vicinity of the Planning Area. General Plan Policies LU 2.5.1 through 2.5.12, promote the protection of agricultural land within the city's SOI until such time that the land is needed for development. In particular, General Plan Policy LU 2.5.4 requires the adoption of a right-to-farm ordinance which will inform residents and businesses within new development adjacent to farmland that they may be exposed to nuisances associated with those operations. General Plan Policy LU 2.5.2 focuses on site design standards that can be employed to reduce conflicts with adjacent agricultural operations that could lead to premature conversion of agricultural lands to non-agricultural use. Considering that the proposed Housing Element will not result in the indirect conversion of agricultural or forest land to non-agricultural or non-forest uses, impacts will be less than significant.

[5] California Department of Conservation. Fresno County Williamson Act FY 2012/2013 Sheet 2 of 2.

3. AIR QUALITY

Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
A) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
B) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☐	☐	☒	☐
C) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	☐	☐	☒	☐
D) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
E) Create objectionable odors affecting a substantial number of people?	☐	☐	☒	☐

A-C) **Less than Significant Impact.** The City of Reedley is located within the San Joaquin Valley Air Basin (Basin) that is managed by the San Joaquin Valley Air Pollution Control District (SJVAPCD).[6] The SJVAPCD is located in California's Central Valley and is comprised of the Counties of San Joaquin, Stanislaus, Merced, Madera, Fresno, Kings, and Tulare, and the San Joaquin Valley Air Basin portion of Kern County. Due to meteorological, geographical, and topographical conditions in the Central Valley that result in a low tolerance for air pollution in the Basin, the Basin exhibits air pollution at levels comparable to that of the South Coast Air Basin despite the population of the Central Valley being ten times less than that of the greater Los Angeles region, demonstrating the unique air quality challenges faced by SJVAPCD. Future housing developed in accordance with the goals and policies of the Housing Element will have the effect of contributing incrementally to the mobile, energy, and area sources that cumulatively contribute to criteria pollutant levels and associated air pollution in the Basin. The SJVAPCD is responsible for preparing the various pollution control Plans and Maintenance Plans that comprise the Air Quality Management Plan (AQMP) for the Basin. The AQMP includes strategies and control measures to reduce and/or maintain the effects that construction and operation of various uses within the Basin have on regional air quality. The effects of future housing development on regional air quality could result in potentially significant impacts on the health of residents if it is determined that a project's individual contribution to cumulative air pollution levels is considerable by exceeding the annual emissions thresholds established by the SJVAPCD in its *Guidance for Assessing and Mitigating Air Quality Impacts* and, furthermore, would be determined to potentially conflict with implementation of the AQMP.[7] Criteria pollutants can directly damage the environment, both natural and man-made. Impacts to human health include a variety of acute and chronic respiratory illnesses.

6 San Joaquin Valley Air Pollution Control District. About the District. http://www.valleyair.org/General_info/aboutdist.htm [November 16, 2015]

7 San Joaquin Valley Air Pollution Control District. Guidance for Assessing and Mitigating Air Quality Impacts. March 2015

The SJVAPCD *Guidance* identifies procedures for evaluating projects through a screening process that alleviates full air quality review where, based on analysis documented by the SJVAPCD, projects meeting certain criteria are determined to not have a substantial effect on air quality but cannot be found exempt from environmental analysis pursuant to CEQA. The SJVAPCD *Small Project Analysis Level* (SPAL) guidelines identify screening thresholds for single-family, multi-family, retirement community, and manufactured housing projects based on traffic generation and number of dwelling units. The daily traffic generation screening threshold is established at 1,453 daily trips. Dwelling unit thresholds range from 152 units for single-family residential projects to 460 units for retirement communities. Projects not meeting the SPAL screening threshold are then afforded the Cursory Analysis Level (CAL) procedure that requires project-specific, quantitative emissions modeling that includes construction-related and operational criteria pollutant emissions, carbon monoxide hotspot screening and/or modeling, and assessment of hazardous air pollutant emissions before determining if mitigation is required. The CAL process is generally applicable to projects that do not require an Environmental Impact Report (EIR) and are not subject to the Full Analysis Level (FAL) process as such.

Development of future housing will be subject to environmental evaluation for exemption and potential analysis pursuant to CEQA upon application for entitlement permits. Projects found to be exempt from CEQA will not have a significant impact on the environment as declared by state legislation. Other projects will be subject to standard analysis and mitigation if required. General Plan Policy COSP 4.4.1 requires that the City of Reedley evaluate project-specific air quality impacts using the air district's analysis methods and significant thresholds. As analyzed in the General Plan EIR, full build out of the City of Reedley and its SOI will result in substantial increases in population and vehicle trips and emissions due to construction activity; therefore, increased emission of criteria pollutants within the air basin will result. Implementation of General Plan Goals LU 2.5B and LU 2.5E requires the minimization of urban sprawl and emphasizes infill development that places goods, services, and employment opportunities in proximity to each other to encourage pedestrian-oriented design, respectively. General Plan Policy COSP 4.4.1 requires that air quality impacts be determined using analysis methods and significance thresholds recommended by the air district. General Plan Policy COSP 4.4.2 requires the reduction of air quality impacts for projects that are cumulatively significant, General Plan Policy COSP 4.4.3 encourages innovative mitigation measures to reduce air quality impacts. General Plan Policy COSP 4.4.4 recommends that the City apply standard conditions of approval to all projects regardless of size. General Plan Policy COSP 4.4.7 requires continued coordination of programs implementing transportation control measures to reduce vehicle trips and vehicle miles traveled (VMT). General Plan Policies COSP 4.7.1 through 4.7.3 include requirements for the reduction of particulate emissions from sources under jurisdiction of the City. General Plan Goal COSP 4.9A includes policies that are intended to reduce mobile emissions from vehicle trips and VMT. Policies include designation of mixed use developments, pedestrian-oriented developments, and the development of complementary uses to improve pedestrian, transit, and bicycle access. General Plan Goal 4.10A includes key policies to reduce emissions from vehicle trips and VMT such as improvement of long range transit plans, requirement for pedestrian pathways between developments, expansion of signal timing programs, and the use of zero emission vehicles and clean alternative fuels.

The General Plan EIR concluded that build out of the General Plan will be inconsistent with the air district's air quality management plans and will result in substantial increases in criteria pollutant emissions within the air basin. The proposed Housing Element does not propose any land use changes or designate any Inventory Sites that were not already analyzed in the General Plan EIR. Therefore, long term impacts in the Planning Area have already been contemplated, and the proposed Housing Element will not result in impacts that are greater than those contemplated in the General Plan EIR. In addition, future development of the proposed Inventory Sites will be subject to the Goals and Policies of the General Plan and will be subject to environmental evaluation for exemption and potential analysis pursuant to CEQA. Impacts related to implementation of the proposed Housing Element will be less than significant.

D) **Less than Significant Impact.** Common sensitive receptors include children under age 14, the elderly over age 65, athletes, and people with cardiovascular and chronic respiratory diseases. Each of the residential Inventory Sites is surrounded by residential uses and the mixed-use Inventory Sites are surrounded by residential, commercial, and limited industrial uses. Future housing projects are not considered uses that emit substantial levels of hazardous air pollutants that could have an effect on the environment such that potentially significant impacts will occur. According to the EPA, there is one toxic air emitter within the City of Reedley. Guardian Industrial Corporation, located at 1485 East Curtis Avenue, is a glass

product manufacturing facility.[8] According to the EPA, this facility emits volatile organic compounds and is in compliance with applicable regulations. Inventory Sites 58 and 59 are located within 0.25 mile of the facility and Inventory Sites 51 through 57 are located with 0.5 mile of the facility. General Plan Policies COSP 4.6.1 and 4.6.2 require that residential projects and other sensitive receptors be located an adequate distance from existing and potential sources of toxic emissions and that new sources of hazardous emissions be located an adequate distance from residential and sensitive receptor areas. In addition, Policy COSP 4.6.3 requires proposed industrial processes with state or federal toxic emissions to prepare health risk assessments, minimizing impacts to surrounding uses. With implementation of existing regulatory requirements (or mitigation if required), impacts to sensitive receptors will be less than significant.

E) **Less than Significant Impact.** Residential land uses do not generate objectionable odors that could impact a substantial number of people; therefore, future housing development will not result in effects related to odors that could impact a substantial number of people. There are no sources of objectionable odors located in the vicinity of any Inventory Site identified in the proposed Housing Element. As discussed in the General Plan EIR, future industrial uses could be sources of odors that affect sensitive land uses such as residential areas. Implementation of General Plan Policy LU 2.7.50 and LU 2.7.55 will ensure that incompatible land uses are not co-located, minimizing odor impacts. Impacts will be less than significant.

[8] Environmental Protection Agency. Envirofacts. ICIS-Air. Plant Information (Guardian Industries). http://iaspub.epa.gov/enviro/afs_reports.detail_plt_view?p_state_county_compliance_src=06019C1915 [December 4, 2015]

4. BIOLOGICAL RESOURCES

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
A) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☒	☐
B) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or US Fish and Wildlife Service?	☐	☐	☒	☐
C) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☒	☐
D) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☒	☐
E) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒
F) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

A) **Less than Significant Impact.** According to the General Plan EIR, there have been recorded occurrences of ten special-status plant species and 13 special-status animal species within the general vicinity of the Planning Area. According to the General Plan EIR, there were recorded occurrences of California satintail and valley elderberry longhorn beetle within the Planning Area. California satintail is a species of grass with moderate potential to occur in the Planning Area and requires a habitat in chaparral, coastal scrub, Mojavean desert scrub, meadows and seeps, and riparian scrub. Valley elderberry longhorn beetle is found in elderberry shrubs and is usually found in Central Valley riparian habitats. According to the General Plan EIR, there is high potential for the valley elderberry longhorn beetle to occur in the Planning Area. Construction of future housing on the Inventory Sites could have the effect of removing or disturbing habitat, potentially resulting in harm to sensitive species during its removal or indirectly if the habitat is used for foraging or for other means of sustenance. Occupancy of the homes can result in effects on sensitive species and habitat by introducing human activities and domestic animals that can result in harm or habitat loss. The impacts that can result due to harm or loss of sensitive species are most easily understood as the results of upsetting a piece of an intricately balanced and interdependent ecology that can result in cumulative impacts

on other species, including humans, as the ecosystem adjusts to environmental pressures such as imbalances in predator and prey ratios or further loss or changes in habitat as species adjust.

General Plan Goal 4.14C requires the preservation of native vegetation and protected wildlife, habitat areas, and vegetation as feasible. General Plan Policy COSP 4.14.4 requires that biological studies be prepared to assess habitat value, implementation of mitigation, and coordination with agencies and individuals with expertise in biological resources. To ensure that impacts to special-status species are avoided or reduced to less than significant levels, the General Plan EIR incorporated Mitigation Measures BIO-1, BIO-2, and BIO-3 to minimize potential impacts associated with the effects of development on sensitive species and habitat. Mitigation Measures BIO-1 and BIO-2 require focused surveys in accordance with current California Fish and Wildlife, California Native Plant Society, and United States Fish and Wildlife Service survey protocols if suitable habitat for special-status plant or animals species are identified. These mitigation measures are applied when a project has been submitted for approval as part of the environmental impacts evaluation. Should special-status plant or animal species occur on a site, the appropriate avoidance or mitigation shall be provided in coordination with federal or state regulatory agencies. Should construction activities occur within 250 feet of mature trees or shrubs during the nesting bird season, Mitigation Measure BIO-3 requires that a qualified biologist conduct a pre-construction survey for nesting birds to ensure that no nests will be disturbed. If an active nest is detected within 250 feet of construction, a protective construction-free buffer zone from each active nest will be required. The proposed Housing Element update does not include any changes to the land use designations of the Inventory Sites and does not propose any Inventory Sites that were not previously analyzed in the General Plan EIR; thus, impacts associated with potential development of the Inventory Sites will remain within the scope of analysis certified in the General Plan EIR. Future development of the Inventory Sites will be subject to project-specific environmental review pursuant CEQA, as applicable. Considering that the General Plan EIR analyzed impacts to sensitive species and impacts were found to be less than significant with mitigation incorporated, and that the proposed Housing Element will not result in increased impacts than previously contemplated in the General Plan EIR, impacts will be less than significant.

B-C) **Less than Significant Impact.** According to the General Plan EIR and the National Wetlands Inventory, riparian and wetlands are located along the Kings River corridor, which Inventory Sites 31, and 66 are adjacent to.[9] These resources are sensitive due to the important habitat they provide for a variety of species and their role in the natural treatment and conveyance of water. Future development of these sites could result in direct effects to these resources through habitat removal or the disruption of the resources natural function, or indirectly by generating noise, lighting, urban runoff, and other activities that could result in effects on how the resource is used by species. Potential impacts are similar to those resulting from effects on sensitive species, namely upset to the ecosystem due to changes in the balance of species and habitat.

The General Plan EIR determined that implementation of General Plan Policies will minimize potential impacts resulting from the direct and indirect effects of future development within the City to less than significant levels. General Plan Policy COSP 4.14.1 requires the preservation and protection of the Kings River and creek system. General Plan Policy COSP 4.14.2 calls for the designation of the Kings River corridor and associated creeks, woodlands, and other appropriate areas as Open Space. General Plan Policy COSP 4.14.3 calls for the maintenance of an approximately 200-foot open space buffer between urban development and the Kings River corridor. General Plan Policy COSP 4.14.5 calls for enhanced native vegetation in the Kings River riparian area. General Plan Policy COSP 4.14.6 calls for the reforestation of open space lands between the Kings River and adjacent development. General Plan Policy COSP 4.14.7 prohibits the use of off-road vehicles and firearms on lands designated as Open Space. General Plan Policy 4.14.8 requires recreational use of the River and creeks to minimize impacts on the habitat value. The proposed Housing Element update does not include any changes to the land use designations of the Inventory Sites, thus, impacts associated with potential development of the Inventory Sites will remain within the scope of analysis certified in the General Plan EIR. Incorporation of the General Plan Policies discussed above will ensure that impacts to riparian and wetland resources resulting from future development of housing will be less than significant.

[9] U.S. Fish and Wildlife Service. National Wetlands Inventory. Wetlands Mapper. http://www.fws.gov/wetlands/Data/Mapper.html [December 5, 2015]

D) **Less than Significant Impact.** A regional wildlife movement corridor exists along the Kings River riparian corridor and potentially along Wahtoke Creek. Inventory Sites 31 and 66 are located adjacent to the Kings River Corridor. The General Plan EIR concluded that impacts to wildlife movement will be less than significant with implementation of General Plan Policies. General Plan Policy COSP 4.14.12 requires that parks and open space corridors be designed to provide linkages between potential habitat areas. In addition, General Plan Policies discussed above will reduce potential impacts of new development on this corridor; therefore, less than significant impacts will occur as a result of development of any Inventory Site. All linear water bodies serve as corridors for terrestrial and aquatic species to migrate, and other water bodies can serve as nodes along the Pacific Flyway that accommodate the seasonal movement of avian species between Canada and South America. Wildlife corridors and the movement of animals are important in maintaining genetic diversity, accommodating mating patterns, and ensuring that seasonal behavior is not interrupted. As discussed in Issue 4.B-C, future development of Inventory Sites will not result in significant impacts to any creeks, rivers, or other water bodies with incorporation of General Plan Policies, thus, creeks, rivers, and the like will remain open as wildlife corridors. Impacts will be less than significant.

E) **No Impact.** According to the General Plan EIR, the City of Reedley has not adopted local ordinances or regulations pertaining to biological resources; therefore, implementation of the proposed Housing Element will not conflict with any locally adopted ordinance or regulation. No impact will result.

F) **No Impact.** The Planning Area is not located within a Natural Community Conservation Plan (NCCP). The Planning Area is located within the boundaries of the Pacific Gas and Electric Company (PG&E) San Joaquin Valley Operation and Maintenance Habitat Conservation Plan (HCP). PG&E's service area encompasses approximately 70,000 square miles in 48 of the 58 counties in California. The HCP addresses small-scale temporary effects due to operation and maintenance of the service area that are dispersed over a large geographic area. The activities covered in the HCP include two categories of activities for which PG&E requests take authorization conducted in accordance with CPUC requirements: operation and maintenance activities and minor construction activities. Although the City is located within the HCP boundary, the HCP covers only PG&E-related operation and maintenance and construction activities and does not cover any other facilities or activities. Therefore, implementation of the proposed Housing Element will not conflict with the intent of the HCP. No impact will occur.

5. CULTURAL RESOURCES

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
A) Cause a substantial adverse change in the significance of a historical resource as defined in Section15064.5?	☐	☐	☒	☐
B) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	☐	☐	☒	☐
C) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☒	☐
D) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☒	☐

A) **Less than Significant Impact.** According to the General Plan EIR, portions of the Planning Area contain two sites listed on the National Register of Historic Places and on the California Register of Historic Resources: the Reedley Opera House and the Old Bank of America Building.[10] These two historic properties are not located on any of the identified Inventory Sites in this proposed Housing Element. Historic resources are important to the knowledge of the past of California and the region while forming a portion of the character of the City that creates a sense of place and identity. Effects that result in the loss of historic structures, properties, or districts can result in impacts that include the loss of cultural identity, loss of unique engineering, architectural, or artistic works, and loss of unique, irreplaceable components of the sense of place that forms a cultural environment. General Plan Policy COSP 4.14.2 requires the preservation and restoration of significant historic buildings that are capable of viable use. General Plan Policy COSP 4.14.3 requires the identification of historic resources through the use of historic landmark markers. General Plan Policy COSP 4.14.5 requires that the City update its inventory of historic and archaeological resources to determine sites or buildings of local, State, or federal significance. Because historic properties are not located on any of the identified Inventory Sites, implementation of the proposed Housing Element will not cause substantial adverse change in significance of a historical resource. Impacts will be less than significant.

B) **Less than Significant Impact.** According to the General Plan, a cultural records search was conducted by the Southern San Joaquin Valley Historical Resources Information Center (HRIC) at California State University, Bakersfield for the Reedley Planning Area.[11] The records search results indicate that there were 30 known cultural resources within the Planning Area or within a half-mile radius, in which four of the sites were identified as Native American archaeological sites.[12]

Similar to potential impacts resulting from the effects of future housing development on historical resources, impacts to archaeological resources can result in the loss of information important to the history (and potentially the pre-history) of California and the people who created and/or used the materials. The potential for uncovering significant resources at Inventory Site locations during construction activities is unknown given that no such resources have been discovered and/or recorded previously. General Plan Policy COSP 4.14.1 states that archaeological and historical resources shall be protected and preserved to the maximum extent feasible.

10 City of Reedley. General Plan. Conservation, Open Space, Parks and Recreation Element. February 2014
11 City of Reedley. General Plan. Conservation, Open Space, Parks and Recreation Element. February 2014
12 City of Reedley. General Plan. Conservation, Open Space, Parks and Recreation Element. February 2014

The General Plan EIR concluded that build out of the General Plan will not result in less than significant impacts related to the substantial adverse change in the significance of archaeological resources. The proposed Housing Element does not propose any land use changes or designate any Inventory Sites that were not already analyzed in the General Plan EIR. Therefore, long term impacts in the Planning Area have already been contemplated, and the proposed Housing Element will not result in impacts that are greater than those contemplated in the General Plan EIR. In addition, future development of the proposed Inventory Sites will be subject to the Goals and Policies of the General Plan and will be subject to environmental evaluation for exemption and potential analysis pursuant to CEQA. Impacts related to implementation of the proposed Housing Element will be less than significant.

C) **Less than Significant Impact.** According to the General Plan EIR, there are no known geological resources and/or unique geological features located within the Inventory Sites. The General Plan EIR concluded that build out of the Planning Area would not have adverse effects on paleontological resources. The proposed Housing Element does not propose any land use changes or designate any Inventory Sites that were not already analyzed in the General Plan EIR. Therefore, long term impacts in the Planning Area have already been contemplated, and the proposed Housing Element will not result in impacts that are greater than those contemplated in the General Plan EIR. In addition, future development of the proposed Inventory Sites will be subject to the Goals and Policies of the General Plan and will be subject to environmental evaluation for exemption and potential analysis pursuant to CEQA. Impacts related to implementation of the proposed Housing Element will be less than significant.

D) **Less than Significant Impact.** Future development of the proposed Inventory Sites that require site preparation and earthmoving activities have the unlikely potential to uncover buried or surficial human remains outside of a recognized cemetery or other burial location. Construction activities that result in disturbing or destroying human remains could result in impacts to our knowledge of the burial practices of the people who were buried, the people who buried the remains, and the pre-historic or historic context and circumstances under which the buried became deceased. Should human remains be discovered, the contractor is required to comply with State Health and Safety Code §7050.5. This requires halting work in the immediate area of the find and notifying the County Coroner, who must then determine whether the remains are of forensic interest. If the Coroner, with the aid of a supervising archaeologist, determines that the remains are or appear to be of a Native American, the Coroner is required to contact the Native American Heritage Commission for further investigations and proper recovery of such remains, if necessary. Implementation of existing regulations will ensure that any discovered remains are appropriately collected and examined for any significant information that can be elicited. Potential impacts due to effects on human remains will be less than significant with implementation of existing regulations.

6. GEOLOGY AND SOILS

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
A) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
ii) Strong seismic ground shaking?	☐	☐	☐	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☐	☐
iv) Landslides?	☐	☐	☐	☐
B) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☐	☐
C) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐
D) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1997), creating substantial risks to life or property?	☐	☐	☒	☐
E) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☒	☐

A, C-D) **Less than Significant Impact.** According to the General Plan EIR, potentially hazardous geological and soils conditions occur in the Planning Area that include fault rupture, severe seismic activity, collapse, lateral spreading, and landslides. According to the General Plan EIR, the City of Reedley is not within an area that is susceptible to ground settlement, subsidence, or liquefaction. Development sites subject to one or more of these conditions can have the effect of disturbing or destabilizing geologic units or soils such that hazards or hazardous conditions are initiated, thereby resulting in potential impacts to properties in vicinity of the project. Potential impacts to properties within the vicinity and inclusive of the development include property destruction, injury, and loss of life depending on the severity of the impact. Geological and soils hazards of concern are summarized below as described in the Fresno County General Plan EIR, supplemented by additional data.[13]

[13] Fresno County. General Plan Update Draft Environmental Impact Report. February 2000

- **Fault Rupture:** There are active and potentially active faults within and adjacent to Fresno County. Faults within Fresno County and major active and potentially active faults in the region are described in Section 14.3 of the County's General Plan EIR. The Nunez and Ortigalita faults are located near Coalinga and Panoche in the West Valley and have been designated Alquist-Priolo Earthquake Fault Zones (EFZ). An active fault may pose a risk of surface fault rupture. Surface rupture occurs when movement on a fault deep within the earth breaks through to the surface. Fault rupture typically follows preexisting faults and the rupture may occur suddenly during an earthquake or slowly in the form of a fault creep.
- **Seismic Groundshaking:** Most of Fresno County east of Interstate 5 (I-5) is located in Seismic Zone 3 pursuant to the California Building Code. Areas in the Coast Range and foothills and an area along the Fresno County-Inyo County boundary are located in Seismic Zone 4. Groundshaking is the primary seismic hazard in Fresno County, because of the seismic setting and record of historical activity. Urbanized locations in the East Valley, West Valley, and Sierra Nevada Foothills are subject to less intense seismic effects than locations in the Coast Range Foothills and Sierra Nevada Mountains.
- **Landslide:** Areas in Fresno County prone to landslides that are populated are located in the foothill and mountain areas where fractured and steep slopes are present such as in the Sierra Nevada, where less consolidated or weathered soils overlie bedrock as in the Coast Range, or where inadequate ground cover accelerates erosion.[14] There is no risk of large landslides in the Valley area of the County due to its relatively flat topography; however, the potential for small slides and slumping exists along the steeper banks of river or creeks in the Valley. Risks from landslides are minimal since the City of Reedley is located on the level San Joaquin Valley floor. However, new development on Inventory Sites 31 and 66, which are adjacent to the Kings River, may be impacted due to slopes occurring along the River.
- **Expansive Soils:** Expansive soils are those that greatly increase in volume when they absorb water and shrink when they dry out. Expansion is measured by shrink-swell potential defined by the relative volume change in soil while gaining in moisture. If the shrink-swell potential is rated moderate to high, damage to buildings, roads, and other structures can occur. Soils exhibiting a high to moderately high shrink-swell potential generally occur in a linear, northwest-trending area generally parallel to the Friant-Kern Canal foothills in Kings Canyon National Park of the Sierra Nevada and along Fresno Slough from Madera County to Kings County. Investigations conducted under the auspices of the Natural Resource Conservation Service (NRCS) for the Westlands Water District have identified areas of expansive soils generally parallel the San Luis Drain.

Future housing developed pursuant to the policies of the proposed Housing Element will be subject to the requirements of the California Building Code (CBC) as adopted by the City, including preparation of a soils report. The CBC requires analysis of soils and application of engineering standards to ensure project sites are made suitable for building construction, particularly in regard to foundation design. Typical foundation design requirements to prevent failure due to the effects of geological hazards include post-tensioning due to lateral spreading/collapse, installation of piles due to liquefaction, dewatering or pre-saturation due to expansive soils, and installation of geomats due to landslides. Foundation and structural design for proposed development of the Inventory Sites will be subject to analysis and design recommendations by a licensed geotechnical engineer for review and approval by the City. In addition, General Plan Policy SE 5.2.1 requires the preparation of preliminary soil, geotechnical, or seismic reports. General Plan Policy SE 5.2.2 prohibits development in areas where geologic hazards are not mitigable. General Plan Policy SE 5.4.2 requires that structures of more than 50 feet or four stories include special design considerations for seismic hazards. Further, General Plan Policy COSP 4.14.3 requires an approximately 200-foot open space buffer between urban development and the Kings River, reducing impacts related to landslides along the River. Impacts due to geological and soils hazards will be less than significant.

B) **Less than Significant Impact.** Natural forces, both chemical and physical, are continually at work breaking down and moving rocks, minerals, and soils. Erosion poses environmental hazards through the effect of removing soils that can undermine roads and buildings and destabilize slopes. Erosion can also result in environmental damage by depositing soils in reservoirs, lakes, and drainage structures that can result in impacts to wildlife and human health by changing the ecological

[14] Ibid 8

properties or the physical boundaries of the water body or drainage control device. In the eastern Fresno County area, soils exhibiting moderately high to high erosion potential are located in the Sierra Nevada and its foothills, generally coinciding with slopes that exceed 30 percent, although most areas are not substantially populated. Within the Valley, erosion is generally not problematic except for areas containing *Rossi* soils east of the Fresno Slough. Severe erosion potential has also been identified along the San Joaquin River Bluff where widely spaced gullies have eroded soils from subsiding floodwaters that drain into the main flood control channel. The City of Reedley General Plan EIR concluded that impacts will be less than significant with implementation of General Plan Policies SE 5.2.1 and SE 5.2.2, requiring the identification and mitigation of geologic and soil constraints. In addition, non-point source pollutants, including sediment generated by erosion of surface soils, are regulated by Section 8-5-1 of the Reedley Municipal Code. Further, future developments on proposed Inventory Sites are subject to Federal and State regulations limiting erosion pursuant to NPDES requirements, and SJVAPCD rules. Impacts will be less than significant.

E) **Less than Significant Impact.** Municipal Code Section 8-2-2 (Use of Public Sewers Required) requires use of the public sewer system and prohibits the installation or maintenance of septic tanks or other facilities intended for the disposal of sewage. Properties with existing septic systems that are located more than 100 feet from a public sewer are not required to connect to the sewer system, provided that the septic system is operating in a manner satisfactory to the City Health Department and Director of Public Works. According to Municipal Code Section 8-2-3 (Private Sewage Disposal), at such time as a public sewer becomes available to a property served by a private sewage disposal system, a direct connection shall be made and the private sewage disposal system shall be abandoned and filled with suitable material. Further, General Plan Policy COSP 4.2.4 requires that public sewer service be provided to new urban development as a means to protect groundwater resources. Impacts will be less than significant.

7. GREENHOUSE GAS EMISSIONS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
A) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
B) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

A-B) **Less than Significant Impact.** Climate change is the distinct change in measures of climate for a long time period. Climate change is the result of numerous, cumulative sources of greenhouse gas emissions all over the world. Natural changes in climate can be caused by indirect processes such as changes in the Earth's orbit around the Sun or direct changes within the climate system itself (i.e., changes in ocean circulation). Human activities can affect the atmosphere through emissions of greenhouse gases (GHG) and changes to the planet's surface. Human activities that produce GHGs are the burning of fossil fuels (coal, oil and natural gas for heating and electricity, gasoline and diesel for transportation); methane from landfill wastes, raising livestock, and deforestation activities; and some agricultural practices.[15]

Greenhouse gases differ from other emissions in that they contribute to the "greenhouse effect." The greenhouse effect is a natural occurrence that helps regulate the temperature of the planet. The majority of radiation from the sun hits the Earth's surface and warms it. The surface in turn radiates heat back towards the atmosphere, known as infrared radiation. Gases and clouds in the atmosphere trap and prevent some of this heat from escaping back into space and re-radiate it in all directions. This process is essential to supporting life on Earth because it warms the planet by approximately 60° Fahrenheit. Emissions from human activities since the beginning of the industrial revolution (approximately 250 years ago) are adding to the natural greenhouse effect by increasing the gases in the atmosphere that trap heat, thereby contributing to an average increase in the Earth's temperature. Greenhouse gases occur naturally and from human activities. Greenhouse gases produced by human activities include carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6). Since 1750, it is estimated that the concentrations of carbon dioxide, methane, and nitrous oxide in the atmosphere have increased over 36 percent, 148 percent, and 18 percent, respectively, primarily due to human activity. Emissions of greenhouse gases affect the atmosphere directly by changing its chemical composition while changes to the land surface indirectly affect the atmosphere by changing the way the Earth absorbs gases from the atmosphere.

In August 2008, the SJVAPCD adopted the Climate Change Action Plan (CCAP). The CAP required the development of guidance to assist Lead Agencies, project proponents, permit applicants, and interested parties in assessing and reducing project-specific contributions of greenhouse gas emissions and resulting cumulative impacts due global climate change.[16] On December 17, 2009, the SJVAPCD adopted the *Guidance for Valley Land-use Agencies in Addressing GHG Emission Impacts for New Projects under CEQA*. The guidance relies on the use of performance based standards, otherwise known as Best Performance Standards (BPS), to normalize the effects resulting from project-specific greenhouse gas emissions that contribute to global climate change during the environmental review process, as required by CEQA.

15 United States Environmental Protection Agency. *Frequently Asked Questions About Global Warming and Climate Change. Back to Basics*. April 2009.

16 San Joaquin Valley Air Pollution Control District. Climate Change Action Plan. http://www.valleyair.org/Programs/CCAP/CCAP_menu.htm [November 17, 2015]

Use of the BPS method is designed to streamline the CEQA process for determining significance and is not a mandated emissions reduction program as promulgated by the SJVAPCD. Projects for which the BPS method has been used can be determined to have less than cumulatively significant impacts related to climate change as supported by evidence documented by the SJVAPCD. Otherwise, demonstration of a 29 percent reduction in GHG emissions as compared to future conditions under which the project is operated without GHG reduction methods (known as the Business-as-Usual, or BAU, baseline) is required to find that a project would contribute inconsiderably to cumulative global climate change conditions and the resulting impacts to the environment. The guidance does not limit a lead agency's authority to establish its own process for determining the significance of impacts resulting from global climate change or the projects contribution to those impacts.

CONSTRUCTION EMISSIONS

Future development proposed on Inventory Sites will result in short-term greenhouse gas emissions from construction activities. Greenhouse gas emissions would be released by equipment used for demolition, grading, paving, and other building construction activities. GHG emissions would also result from worker and vendor trips to and from project sites and from demolition and soil hauling trips. Construction activities are short term and cease to emit greenhouse gases upon completion, unlike operational emissions that are continuous year after year until operation of the use ceases. In recognition of the temporary character of GHG emissions from construction activities, the SJVAPCD Guidance does not require construction-related GHG emissions to be included in analysis of project-specific climate change impacts.

LONG-TERM EMISSIONS

Future development projects will result in continuous GHG emissions from mobile, area, and other operational sources. Mobile sources, including vehicle trips to and from development projects, will result primarily in emissions of CO_2, with minor emissions of CH_4 and N_2O. The most significant GHG emission from natural gas usage would be methane. Electricity usage by future development and indirect usage of electricity for water and wastewater conveyance would result primarily in emissions of carbon dioxide. Disposal of solid waste would result in emissions of methane from the decomposition of waste at landfills, coupled with CO_2 emission from the handling and transport of solid waste. These sources combine to define the long-term greenhouse gas inventory for typical development projects.

Future housing will be constructed on undeveloped and currently developed, underutilized properties. GHG emissions will be evaluated during the City's standard environmental review process as required by CEQA, relying on the City of Reedley Climate Action Plan, and using the BPS method promulgated by the SJVAPCD. Applicable measures will be incorporated into future projects, ensuring GHG emissions are reduced to levels that will not be considered cumulatively considerable in the context of global climate change and resulting impacts. Some projects may be required to identify a GHG emissions inventory using regulatory and industry standard methodologies and measures to reduce emissions by 29 percent from BAU levels. GHG reduction measures identified in the Guidance documentation are categorized bicycle/pedestrian/transit, parking, site design, mixed-use, building component, transportation demand, and miscellaneous, each addressing the various operational sources of GHG emissions that are generated by development. Incorporation of BPS will ensure compliance with the regional CCAP and by extension the targets identified in the state Scoping Plan for reduction of GHG emissions. Impacts will be less than significant.

8. HAZARDS AND HAZARDOUS MATERIALS

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
A) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
B) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
C) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
D) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☒	☐
E) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
F) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
G) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
H) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	☐	☐	☒	☐

A-D) **Less than Significant Impact.** Residential and mixed-use housing development do not cause or contribute substantially to potential hazards to the public or the environment because these uses do not involve the use, transport, or disposal of appreciable amounts of hazardous materials or wastes. For purposes of the following analysis, a "significant hazard to the public or the environment" is characterized by the effects of exposure to hazardous materials and/or wastes from a facility or facilities that are subject to operations-specific federal, state, regional, or local regulations and implementation processes (including permitting, accident contingency, and clean-up requirements) based on the amount of material or waste

undergoing use, transport, or disposal and the resulting impacts to human health or ecosystem functions. Residential uses are characterized by the use of common, widely available hazardous materials including paints and other solvents, cleaners, and pesticides. The remnants of these and other products are disposed of as household hazardous waste (HHW) that includes batteries, electronic wastes, and other wastes that are prohibited or discouraged from being disposed of at local landfills. Use of common household hazardous materials are not subject to federal or state permitting at the consumer level and it is reasonably foreseeable that upset and accident conditions cannot be met by the use, transport, and disposal of such materials and wastes from future residences. Consumer-level household hazardous materials and wastes are not subject to federal or state permitting by the consumer, and their use is at such levels as to not have the potential to result in risk of upset or accident that could harm a substantial number of people, including children attending schools in the area, or have a substantial effect on the functions of the local or regional ecosystem.

Hazardous Sites: The proposed Inventory Sites are not listed as hazardous waste and substances sites, leaking underground storage tank sites, solid waste disposal sites, hazardous waste facilities subject to corrective action, or sites regulated by the Regional Water Quality Board.[17] There are three Cleanup Program Sites located in close proximity to identified mixed-use Inventory Sites located along H Street. The former Western Farm Services, located at 953 G Street, conducted a site assessment in 1996 and found nitrate in the soil on site.[18] A follow-up investigation including groundwater sampling was requested in April 2015 and is currently under way. A former dry cleaning facility, located at 1340 G Street, conducted a soil vapor intrusion investigation to test indoor air quality at the facility.[19] Previous soil samples found high levels of PCE at the subject site. Engineering controls have been installed at the facility, and soil and soil gas remediation at the impacted site was expected to occur in early 2015. A former dry cleaning facility, located at 1319 G Street, is conducting air sparging and vapor extraction according to the State Water Resources Control Board.[20] Monitoring wells are sampled annually. Remaining impacts will be remediated concurrently with remediation at the former dry cleaning facility located at 1340 G Street. General Plan Policy COSP 4.6.1 requires that residential projects and other sensitive receptors be located an adequate distance from existing and potential sources of toxic emissions. General Plan Policy SE 5.6.1 requires the assessment of risk involving the transportation, disposal, manufacture, storage, and handling of any hazardous materials at all levels of planning. Therefore, development of future housing on proposed Inventory Sites will be required to assess impacts due to the accidental release of hazardous materials as part of standard environmental review procedures pursuant to CEQA and City policy.

Materials and Wastes Transport: According to the General Plan EIR, hazardous materials pass through the City in route to other destinations via rail and surface street system. The major transportation routes through the City include the surface street system and the San Joaquin Valley Railroad (SJVRR) rail line. Primary truck routes in the City include Manning Avenue, I Street between Manning Avenue and Curtis Avenue, Reed Avenue north of I Street and south of M Street, Olson Avenue west of Reed Avenue, Frankwood Avenue south of Dinuba, Buttonwillow Avenue, and Dinuba Avenue east of Frankwood Avenue. Inventory Sites 19 and 20 are located along the Manning Avenue truck route; Inventory Sites 35 through 50 are located along the I Street truck route; Inventory Sites 20, 30, and 35 are located along Reed Avenue north of I Street; and Inventory Sites 68 and 70 are located along Reed Avenue south of M Street. Inventory Sites 64 and 65 are located along Frankwood Avenue south of Dinuba Avenue. Inventory Sites 12, 16 through 18, 22, 23, and 51 through 54 are located along Buttonwillow Avenue. Inventory Sites 51, 55 through 57, and 58 are located along Dinuba Avenue east of Frankwood Avenue. The San Joaquin Valley Railroad (SJVRR), owned by Rail America, provides freight service to Reedley and traverses Reedley northwest-southeast between I Street and H Street. Inventory Sites 29, 31, 32, and 35 through 50 are located in close proximity to the SJVRR. While train derailment can occur at any time, it is during an earthquake that a derailment and hazardous materials release would pose the greatest risk of hazards. The City has no direct authority to regulate the transport

17 California Environmental Protection Agency. Cortese List Data Resources. http://www.calepa.ca.gov/SiteCleanup/CorteseList/ [December 7, 2015]

18 California State Water Resources Control Board. Geotracker. https://geotracker.waterboards.ca.gov/profile_report.asp?global_id=SLT5FQ665626 [December 7, 2015]

19 California State Water Resources Control Board. Geotracker. https://geotracker.waterboards.ca.gov/profile_report.asp?global_id=T10000000435 [December 7, 2015]

20 California State Water Resources Control Board. Geotracker. https://geotracker.waterboards.ca.gov/profile_report.asp?global_id=SLT5FQ104303 [December 7, 2015]

of hazardous materials on local and regional roadways or railways; however, under upset and accident conditions, it is reasonably foreseeable that the most of the spill would be contained within the right-of-way of a roadway with minimal chance of hazardous materials or wastes reaching adjacent homes. On the other hand, it is reasonably foreseeable that train derailment would result in extensive impacts to adjacent residents as the train and multiple train cars leave the tracks and violently careen with the adjacent environment. Transportation of hazardous materials and wastes by truck and rail is regulated by the U.S. Department of Transportation (DOT). DOT regulations establish criteria for safe handling procedures. Federal safety standards are also included in the California Administrative Code. The California Health Services Department also regulates the haulers of hazardous waste, but does not regulate all hazardous materials. Although there is some reasonably foreseeable potential for exposure of future residents to hazardous materials and wastes under upset and accident conditions, federal and state regulations are in place with a focus on prevention of accidental releases and measures for appropriate containment and cleanup when accidents occur.

Facilities: According to the EPA, there is one large quantity generator (LQG) of hazardous wastes operating within and adjacent to the Planning Area. The Safety-Kleen Systems property located at 1000 South I Street is a solvent recycling and wastewater treatment facility that is listed as a hazardous waste Resource Conservation and Recovery Act cleanup site.[21] Cleanup is currently monitored by the California Department of Toxic Substances Control. LQGs generate more than 1,000 kilograms of hazardous waste per month or more than one kilogram per month of acutely hazardous waste. Both the federal government and the State of California require all businesses that handle hazardous materials or extremely hazardous materials to submit a business risk management plan to the local Certified Unified Program Agency (CUPA). The CUPA with responsibility for the City is the County's Environmental Health department. The business risk management plan must include an inventory of the hazardous materials and emergency response plans and procedures to be used in the event of a significant release of a hazardous material. Implementation of federal and state requirements for the operation of these types of facilities will ensure that exposure to residential uses will be minimized or avoided.

Considering the preceding analysis, the proposed Housing Element will not result in effects from the use, transport, or disposal of hazardous or acutely hazardous materials or wastes, under normal or upset and accident conditions, which could impact human health or the environment with implementation of existing regulations, standards, and General Plan Policy. Impacts will be less than significant.

E-F) **No Impact.** There are nine public and private airports within Fresno County.[22] The public airports are Fresno-Yosemite International Airport, Fresno Chandler Downtown Airport, Coalinga Airport, Firebaugh Municipal Airport, Mendota Municipal Airport, and Reedley Municipal Airport. The private airports are Harris Ranch Airport, Selma Aerodrome, and Sierra Sky Park Airport. Specific land use policy plans have been developed for Fresno-Yosemite International, Fresno Chandler Downtown, Coalinga, Harris Ranch, and Sierra Sky Park Airports. A single land use policy plan has been prepared for Firebaugh, Mendota, Reedley, and Selma Aerodrome.

Airport safety issues and their connection with land use planning are generally associated with hazards posed by departing and landing aircraft crashes and the effects those crashes could have on uses and people on the ground. Development within the approach and departure zones of an airport or airstrip are subject to the effects of potentially widespread, although rare, aircraft crashes; therefore, the denser the development and population within these zones, the greater the risk of impacts to human health. Aircraft crashes can result in the substantial loss of property and life depending on the size of the aircraft, its velocity, the pitch, yaw, and roll at the moment of impact, and the type of cargo it is carrying. Development within the vicinity of an airport can result in increased potential for impact due to height, glare, and electronic interference that can disrupt flight patterns and pilots operating out of the airport.

The Airport Land Use Commission (ALUC) is responsible for ensuring that development within the vicinity of an airport does not cause undue risk to airport operations or the safety of persons on the ground. The commissioners represent the county, its

[21] United States Environmental Protection Agency. Envirofacts. http://oaspub.epa.gov/enviro/rcrainfoquery_3.facility_information?pgm_sys_id=CAD093459485 [December 7, 2015]

[22] Fresno County. General Plan Update Draft Environmental Impact Report. February 2000

cities, and the public. Legislation passed in 1982 established a direct link between airport land use plans and the land use plans and regulations adopted by cities and counties, as established in California Public Utilities Code Section 21676. In accordance with this legislation, the ALUC must review the general and specific plans of local jurisdictions for consistency with the county's airport comprehensive land use plan (CLUP). Primary and Secondary Review Areas must be identified for each facility. Projects proposed within the geographic boundaries of the Primary Review Area are referred to the ALUC for review and evaluation. Within the Secondary Review Area, only those projects involving a structure or other object with a height that would exceed that permitted under adopted land use zoning would be referred to the ALUC for review. Reedley is not located within two miles of any airport and is not located within any airport land use plan. No impact will result.

G) **No Impact**. The City has adopted an Emergency Operations Plan that serves as an extension of the California Emergency Plan. The purpose of the Emergency Operations Plan is to respond to emergency situations with a coordinated system of emergency service providers and facilities. The Emergency Operations Plan addresses the City's planned response to extraordinary emergency situations associated with natural disasters, technological incidents, terrorist activities, and war-related operations. The Plan is designed to include the City as part of a county and statewide emergency management system. The Plan also addresses evacuation and movement of people in the event of an emergency. It should be noted that the Emergency Operations Plan is decidedly flexible in order to respond to the inherent chaos associated with disasters in a manner that is coordinated but responsive to the immediate needs of the situation. The proposed Housing Element does not include any land use, circulation, or safety changes that could conflict with implementation of the Emergency Operations Plan or other emergency response programs. No impact will occur.

H) **Less than Significant Impact.** Fresno County is most prominently subject to wildland fires west of Interstate 5 and east of Clovis and Sanger in approach to the Sierra Nevada.[23] According to the General Plan EIR, agricultural lands surrounding the City of Reedley have a low level of wildland fire hazard due to low fuel load. In addition, the threat of wildland fire within the urbanized areas of the city is low. Wildland fires can result in loss of property and life when coming in contact with developed areas. Wildland fires can also result in dramatic effects to the wildlands from whence they came. Future development within Very High Fire Hazard Severity Zones (VHFHSZ) is required to be constructed pursuant to California Building Code (CBC) Chapter 7A (Materials and Construction Methods for Exterior Wildfire Exposure). Development within the local agency VHFHSZ is considered to be located in the wildlands-urban interface (WUI) and requires special construction in order to protect life and property by increasing the ability of a building to resist intrusion of flames or burning embers projected by a vegetation fire, and conflagration losses. The CBC focuses on the construction and materials used in roofs, attic ventilation, exterior walls, decking, floors and underfloors, and ancillary buildings, structures, and appendages. Implementation of these requirements will ensure that future housing with the WUI is constructed to withstand wildland fires, thereby minimizing any associated impacts. Impacts will be less than significant with implementation of existing regulations.

[23] California Department of Forestry and Fire. Fire Hazard Severity Zone Map. 2007/2008

9. HYDROLOGY AND WATER QUALITY

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
A) Violate any water quality standards or waste discharge requirements?	☐	☐	☒	☐
B) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	☐	☐	☒	☐
C) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner that would result in substantial erosion or siltation on- or off-site?	☐	☐	☒	☐
D) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	☐	☐	☒	☐
E) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☒	☐
F) Otherwise substantially degrade water quality?	☐	☐	☐	☒
G) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	☐	☐	☒	☐
H) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	☐	☐	☒	☐
I) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	☐	☐	☒	☐
J) Inundation by seiche, tsunami, or mudflow?	☐	☐	☒	☐

A) **Less than Significant Impact.** The City of Reedley has prepared a Stormwater Management Implementation Plan to support the City's application for a Municipal Storm Water (MS4) Permit to the Central Valley Regional Water Quality Control Board. The Plan represents the five-year management strategy for controlling the discharge of pollutants to the maximum

extent practicable in storm water runoff during the first NPDES storm water permit term. Reedley Municipal Code Section 8-5-1 (Storm Water management) implement's the City's storm water quality management strategies consistent with its General Construction permit from the Central Valley Regional Water Quality Control Board. These regulations are applicable to all storm water generated on any developed or undeveloped land within the city.

Housing is a common type of urban development and is addressed in the City waste discharge requirements for construction and operational sources of pollutants that can affect downstream surface water bodies by discharge into the local storm drain system. Discharge of pollutants into water bodies can result in effects on the beneficial uses of the water body. Beneficial uses include water for agricultural uses, special areas for biological resources, cold freshwater habitat, commercial and sport fishing, multitudes of habitats, freshwater replenishment sources, areas of artificial or natural groundwater recharge, water for industrial supply and process, water for domestic uses, waters used for navigation, areas where rare or endangered species could occur, fish spawning grounds, migration, shellfish harvesting, and recreational activities.[24] The resulting impacts due to effects on water quality and associated beneficial uses include disruption of the ecosystem due to the loss of habitat, potential harm or death to sensitive species, and a narrowing of migratory options and species' gene pools. Impacts to humans range from quality of life issues such as the loss of recreational waters to potential health impacts due to contamination of drinking water supplies and contamination of fish and other marine life farmed and sold for food. The proposed Housing Element does not include any policies or programs that would conflict with implementation of the NPDES program such that future residential development could result in exceedance of the waste discharge requirements and thus will not substantially impact downstream water quality. Furthermore, future housing development will be subject to environmental inquiry and potential review pursuant to CEQA. Impacts related to violation of water quality standards and waste discharge requirements will be less than significant with implementation of existing permit regulations.

B) **Less than Significant Impact.** The proposed Housing Element can accommodate projected housing demand over the next eight years, which will require potable water for drinking, food preparation, cleaning, and bathing as well as water for landscape irrigation. Future housing will generate demand for water in addition to the demand of existing uses and the incremental increase in demand as growth occurs in the area; therefore, the future housing will contribute to cumulative, long-term increases in demand for groundwater and other water resources. The City is situated above the Kings Groundwater Basin where much of the groundwater supply is generated through recharge of the Basin via the Kings River. No imported water source is available and water supplies are limited to those within the watershed. The dependence on groundwater and the growth in water demand by urban and agricultural users has depleted groundwater resources in the Central Valley. Despite efforts to balance supply and demand, increased pumping during the irrigation season has resulted in seasonal and long-term declines in groundwater levels in some parts of the City. Beyond the potential loss of water for potable and non-potable uses, declines in groundwater can result in effects on the operation of water wells. Water wells are columns in the soil that can be dug by hand, created by driving a pipe through the soil, or drilled to the appropriate depth to extract groundwater where a pump is installed to force water closer to the surface. Declining groundwater levels can cause the water table to descend below a water well's pump intake, rendering the well incapable of drawing water. This problem is exacerbated where multiple wells are in proximity to each other, resulting in a cumulative drawdown of the water table that can result in multiple wells running dry. This can result in temporary water shortages and require the creation of new water wells and abandonment of the existing well, both of which require construction activities that can result in nominal impacts to the environment due to use of construction equipment, penetration of soils, concrete pouring, and worker vehicle trips. Water is essential to the proper function of an ecosystem and human life and activities; thus, water shortages can impact the health and well being of humans and the quality of the environment.

The General Plan EIR includes Mitigation Measure HYD-1 to minimize the impact related to groundwater levels to the extent feasible; however, the potential impacts associated with declines in groundwater level were determined to remain significant and unavoidable. Mitigation Measure HYD-1 requires the City to update its Urban Water Master Plan or prepare a separate water supply plan to identify how to avoid or reduce impacts on groundwater supply. The proposed Housing Element update does not include any changes to the land use designations of the Inventory Sites; thus, impacts associated with potential

[24] Central Valley Regional Water Quality Control District. Water Quality Control Plan for the Sacramento and San Joaquin River Basins. 4th ed. September 1998

development of the Inventory Sites will remain within the scope of analysis in the General Plan EIR. Future development of the Inventory Sites will be subject to environmental inquiry and possible project-specific environmental review pursuant to CEQA. Considering the proposed Housing Element is consistent with the analysis documented in the General Plan EIR and will not increase groundwater demand beyond that assessed in the General Plan EIR, the Housing Element will result in equivalent or less than significant impacts related to the decline in groundwater levels when compared to the significant and unavoidable impact determination documented in the General Plan EIR.

C-E) **Less than Significant Impact.** Future development of housing will occur on currently or previously developed sites and undeveloped sites. Development on currently or previously developed sites is unlikely to substantially change the hydrological conditions of the site that was undoubtedly graded and engineered to convey on-site flows to local storm drains or water quality basins in accordance with the City standard requirements for drainage and flood control, as specified in Municipal Code Section 8-5-1 and Chapters 10 and 12. Development on previously undeveloped sites may result in more substantial changes to the site topography and drainage conditions as cut and fill activity occurs to balance the site for building construction. The concern with changes in on-site drainage is the potential for flooding, erosion, siltation, pollutant loading, and exceedance of storm drain capacity due to the lack of or improperly designed conveyance of runoff. The effects of changes in drainage patterns can result in impacts to human health and quality of life and the environment through damage or destruction of structures, sedimentation of downstream water bodies and the resulting impact to aquatic biological resources, decreased water quality with similar impacts to aquatic biological resources, and storm water backup that can result in similar types of flooding impacts.

According to the General Plan EIR, implementation of General Plan Policies LU 2.7.73, LU 2.7.75, CIR 3.10.16, CIR 3.10.17, COSP 4.2.6, and COSP 4.14.18 will reduce potential impacts related to additional runoff such as erosion and flooding to less-than-significant levels. Policy LU 2.7.73 requires the maintenance of adequate facilities for water and storm drain services. Policy LU 2.7.75 requires that the City update the water, wastewater, and storm drainage master plans on a periodic basis. Policy CIR 3.10.16 requires the update and implementation of a Storm Drain Master Plan that will include water quality protection for areas where runoff may enter the river. Policy CIR 3.10.17 requires new development to provide storm drainage facilities and/or pay a storm drainage impact fee, consistent with the Storm Drain Master Plan. Policy COSP 4.2.6 promotes activities which combine storm water control and water recharge. Policy COSP 4.14.18 recommends exploration of development alternatives and standards to minimize impacts on open space areas. Impacts due to the effects of changes in drainage patterns will be less than significant with implementation of existing regulations and General Plan Policies.

F) **No Impact.** No other potential impacts related to hydrology and water quality were identified in this analysis. No impact will occur.

G-H) **Less than Significant Impact.** The proposed Housing Element Inventory Sites are not located within a 100-year flood hazard area. However, according to the Federal Emergency Management Agency, Inventory Sites 31 and 66 are located in Zone X. Areas in Zone X are subject to 0.2 percent annual chance flood, areas of one percent annual chance flood with average depths of less than one foot or with drainage areas less than one square mile, and areas protected by levees from one percent annual chance flood. According to the General Plan EIR, implementation of General Plan Polices SE 5.1.1 through 5.1.7 will substantially reduce potential hazards from flooding and will reduce potential for new development to impede flood flows. In particular, General Plan Policies SE 5.1.2 through SE 5.1.4 identify specific criteria and conditions that must be met by new development if potential impacts from flood hazards are to be avoided, such as application of flood hazard regulations, evaluation of development sites for flood hazard potential, and application of flood-proofing strategies. Impacts will be less than significant.

I) **Less than Significant Impact**. According to the General Plan EIR, development of housing west of Reed Avenue along the Kings River could occur within the flood inundation area of a dam or levee that could result in property damage and bodily injury or death due to the sudden nature of the release of floodwater during a failure and the resulting depths and velocities. Sources of flooding due to the failure of a dam or levee within the City include Kings River floodplain as a result of the failure of Pine Flat Dam.

The U.S. Army Corps of Engineers is responsible for conducting regular inspections and maintenance of the dam. The U.S. Army Corps of Engineers intends to identify and communicate any risk of dam failure well in advance of any potential event that could trigger a potential failure. Therefore, according to the General Plan EIR, risk of failure is considered to be low; therefore, impacts will be less than significant.

J) **Less than Significant Impact.** *Seiche* is the process by which water sloshes outside its containing boundaries, generally due to an earthquake. Seiche can result in localized flooding that can result in property damage or personal injury. This could occur within an open reservoir, lake, or other large waterbody. The Planning Area does not contain any open reservoirs, lakes, or other large bodies of water; therefore, significant impacts resulting from the effects of seiche will not occur.

A *tsunami* is a large wave that generates in the ocean, generally from an earthquake, and builds intense strength and height before impacting a coast. Tsunami can result in significant property damage and loss of life due to the intense, destructive nature of the wave and the often-sudden occurrence with little chance for warning. The Planning Area is not subject to impacts from the effects of a tsunami because it is located over 100 miles inland of the Pacific Ocean.

A *mudflow* (or debris flow) is a rapidly moving slurry of water, mud, rock, vegetation and debris. Larger debris flows are capable of moving trees, large boulders, and even cars.[25] This type of failure is especially dangerous because it can move at speeds in excess of 10 miles per hour, is capable of crushing buildings, and can strike with very little warning. As with soil slips, the development of debris flows is strongly tied to exceptional storm periods of prolonged rainfall. Ground failure occurs during an intense rainfall event, following saturation of the soil by previous rains. Relatively small amounts of debris can cause damage from inundation and/or impact. According to the General Plan EIR, the Planning Area is relatively flat, and risk of hazard due to mudflow is less than significant.

[25] California Geological Survey, CGS Note 33. Hazards from Mudslides. http://www.conservation.ca.gov/cgs/information/publications/cgs_notes/note_33/Pages/index.aspx [December 3, 2015]

10. LAND USE AND PLANNING

Would the project:

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

A) **No Impact.** Communities form neighborhoods within a broader assemblage of land uses, acting as physically bounded and typically culturally and economically homogenous social networks that often define a person's local sense of place and help shape an individual's social and cultural perspective, particularly as a youth. Such communities typically are self-policing groups with internal codes of conduct and social norms that help define community character while ensuring individuals do not unduly upset the fabric and spirit that perpetuate the community in operating as a social unit. A significant impact would occur if proposed Inventory Sites are sufficiently large or configured in such a way so as to create a physical barrier within an established community. The proposed Housing Element identifies Inventory Sites throughout the City of Reedley. The Inventory Sites rely on existing land use designations to accommodate new residential and mixed-use development, and no changes are proposed. The General Plan does not designate any established communities defined by a Specific Plan that would be affected by implementation of the proposed Housing Element; therefore, implementation of the proposed Housing Element will not create any physical barrier within the community. Furthermore, project implementation will not require new infrastructure systems such as roadways or flood control channels not already planned and previously considered in the General Plan EIR. As such, the Housing Element update will not divide or disrupt neighborhoods or any other established community elements. No impact will occur.

B) **No Impact.** The Housing Element update sets forth policies to encourage housing development consistent with adopted land use policies established in the General Plan. No changes in land use or development intensities are proposed. The Housing Element does not include any goals, policies, or programs that would conflict with adopted General Plan goals and policies to mitigate impacts due to effects generated by development within the Planning Area, as specified in the certified General Plan EIR. No impact will occur.

C) **No Impact.** Please see Section 4.F for a discussion of biological resources planning efforts and analysis related to the proposed Housing Element.

11. MINERAL RESOURCES

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
A) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
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?	☐	☐	☐	☒

A-B) **No Impact.** Fresno County has produced an abundance of minerals due to the wide variety of mineral resources that are present in the County.[26] Extracted resources include aggregate products (sand and gravel), fossil fuels (oil and coal), metals (chromite, copper, gold, mercury, and tungsten), and other minerals used in construction or industrial applications (asbestos, high-grade clay, diatomite, granite, gypsum, and limestone). The Fresno County General Plan Background report illustrates the general distribution of minerals throughout the County in Figure 7-7 (Mineral Resource Locations). It should be noted that the California Division of Mines and Geology (CDMG) has not performed a comprehensive survey of all potential mineral resource locations nor classified other locations within the County into Mineral Resource Zones (MRZ). The General Plan EIR states that the City has not designated locally important mineral resource recovery areas within or immediately adjacent to the city. The Reedley General Plan EIR concluded that there will be no impact to the availability of mineral resources of value to the State or City. The proposed Housing Element does not propose changes to land use designations of the Inventory Sites and does not propose Inventory Sites that were not already analyzed in the General Plan EIR. No impact will occur.

[26] Fresno County. General Plan Update Draft Environmental Impact Report. February 2000

12. NOISE

Would the project result in:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
A) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
B) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
C) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☒	☐
D) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☒	☐
E) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒
F) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

A) **Less than Significant Impact.** To ensure that noise producers do not adversely affect sensitive receptors, the City of Reedley identifies land use compatibility standards within the General Plan to use for planning and development decisions. Table 8 summarizes the City of Reedley's noise standards for various types of land uses according to the General Plan EIR. The standards represent the maximum acceptable noise level as measured at the property boundary, which are used to determine noise impacts. The General Plan Noise Element includes policies, standards, criteria, programs, diagrams, and maps related to protecting public health and welfare from excessive noise exposure. General Plan Goals and Policies together with Municipal Code Section 5-1-18 standards for noise control are incorporated into the land use planning process to reduce noise and land use incompatibilities.

Table 8
Maximum Acceptable Noise Levels

Land Use	Maximum Daytime Noise Level (L_{50}, dBA)	Maximum Nighttime Noise Level (L_{50}, dBA)
Rural Residential	50	45
Urban Residential and Noise Sensitive Receivers	55	50
Urban Commercial	65	60
Urban Industrial	70	70

Source: City of Reedley General Plan EIR. Table 15 (Maximum Acceptable Noise Levels)

CONSTRUCTION NOISE

According to the General Plan EIR, construction activity is typically short-term in nature and is generally not considered to have a significant impact on noise sensitive uses as long as construction activity is limited to daylight hours. In addition, General Plan Policy NE 6.1.3 requires the preparation of an acoustical analysis as part of the special permit process for proposed development. Acoustical analyses will address construction noise impacts on sensitive noise receptors and identify required mitigation, if required.

OPERATIONAL NOISE

The primary contributor to ambient noise in the planning area is traffic, particularly from major roadways such as Reed Avenue, Dinuba Avenue, and Manning Avenue. General Plan EIR Mitigation Measures N-1 through N-3 reduce impacts related to stationary noise generated by transportation noise sources and non-residential projects such as industrial and commercial centers, agricultural operations and vehicle movements on private property to less-than-significant levels. Mitigation Measure N-1 prohibits the development of noise-sensitive land uses in areas exposed to existing or projected noise levels in exceedance of 60 dBA and requires noise created by new transportation noise sources to be mitigated to not exceed 60 dBA. Mitigation Measure N-2 prohibits the development of noise-sensitive land uses in areas exposed to stationary noise levels exceeding allowable noise levels and requires stationary noise sources to mitigate noise levels to within allowable levels. Mitigation Measure N-3 requires implementation of development review and post-development monitoring to ensure that noise goals are met. Future housing developments on the proposed Inventory Sites are subject to the policies of the existing General Plan designed to minimize noise impacts to noise-sensitive properties. The following noise policies of the General Plan will be implemented during the City's standard environmental review process during the entitlement process for housing developments. General Plan Policy NE 6.1.5 and NE 6.1.6 requires the evaluation of noise levels and incorporation of features necessary to minimize adverse noise impacts.

The proposed Housing Element update does not include any changes to the land use designations of the Inventory Sites; thus, impacts associated with potential development of the Inventory Sites will remain within the scope of analysis in the General Plan EIR. Future Housing Development will be subject to preliminary environmental review pursuant to CEQA and if found not to be exempt, subject to full environmental analysis at which time all environmental issues will be vetted and appropriate mitigation incorporated, if needed, should noise impacts be identified. Potential impacts will be less than significant with implementation of existing standards and regulations.

B) **Less than Significant Impact.** Vibration is sound radiated through the ground. The rumbling sound caused by the vibration of room surfaces is called groundborne noise. The ground motion caused by vibration is measured as particle velocity in inches per second, and in the U.S. is referenced as vibration decibels (VdB).

The background vibration velocity level in residential and educational areas is usually around 50 VdB. The vibration velocity level threshold of perception for humans is approximately 65 VdB. A vibration velocity level of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels for many people. Sources within buildings such as operation of mechanical equipment, movement of people, or the slamming of doors cause most perceptible indoor vibration.

Typical outdoor sources of perceptible groundborne vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If a roadway is smooth, the groundborne vibration from traffic is rarely perceptible. The range of interest is from approximately 50 VdB, which is the typical background vibration velocity level, and 100 VdB, which is the general threshold where minor damage can occur in fragile buildings.

The general human response to different levels of groundborne vibration velocity levels is described in Table 9 (Human Reaction to Vibration).

Table 9
Human Reaction to Vibration

Vibration Velocity Level	Human Reaction
65 VdB	Approximate threshold of perception for many people.
75 VdB	Approximate dividing line between barely perceptible and distinctly perceptible. Many people find that transportation-related vibration at this level in unacceptable.
85 VdB	Vibration acceptable only if there are an infrequent number of events per day.

Source: Federal Transit Administration, Transit Noise and Vibration Impact Assessment, May 2006

Groundborne vibration can result in impacts from minor annoyances to people to major shaking that damages buildings. The primary source of groundborne vibration within the City would be railroad and heavy construction activities. According to the Caltrans *Transportation- and Construction-Induced Vibration Guidance Manual*, transportation sources are not a significant source of vibration and therefore are not discussed below.

Groundborne vibration generated by construction projects is usually highest during pile driving, rock blasting, soil compacting, jack-hammering, and demolition-related activities. Next to pile driving, grading activity has the greatest potential for vibration impacts if large bulldozers or large trucks are used. The construction of future potential housing developments could utilize machinery that would generate substantial amounts of ground vibration because multiple-lot housing developments generally require mass grading. Construction of future development is not likely to require rock blasting considering the built-out character of the area. Table 10 (Common Construction Vibration) summarizes vibration levels from common construction equipment. Impacts to structures can occur from 0.08 PPV to 2.00 PPV depending on the duration of the vibration and the age of the structure. Similarly, human annoyance to vibration can occur from 0.01 PPV to 2.00 PPV depending on the duration.

Table 10
Common Construction Vibration

Equipment	PPV (in/sec at 25 ft.)
Crack-and-Seat Operations	2.400
Vibratory Roller	0.210
Large Bulldozer	0.089
Caisson Drilling	0.089
Loaded Trucks	0.076
Jackhammer	0.035
Small Bulldozer	0.003

Source: California Department of Transportation 2004

Vibration impacts are temporary and rare except in cases where large equipment is used near existing, occupied development.

With regard to railroad operations, noise and vibration impacts would be evaluated on a project-by-project basis pursuant to CEQA and the City's local implementation procedures. As mentioned in the General Plan EIR, it is unknown if rail operations could increase in the future; therefore, noise levels generated by the train would remain the same as under existing conditions where land uses within 125 feet of the train tracks may experience noise levels in excess of 60 dB. Because the proposed Housing Element identifies Inventory Sites in close proximity to the rail corridor, potential future development and

redevelopment to occur within the area may be exposed to noise levels in excess of 60 dB. Mitigation Measure N-1 prohibits the development of noise-sensitive land uses in areas exposed to existing or projected noise levels in exceedance of 60 dBA and requires noise created by new transportation noise sources to be mitigated to not exceed 60 dBA. According to the General Plan EIR, with implementation of Mitigation Measure N-1, impacts will be reduced to less than significant levels.

Vibration is difficult to control, and the best methods for mitigation are avoidance. Typical vibration mitigation includes routing and placement of equipment to maximize distance to receptors and use of alternative equipment, such as use of drilled pile drivers as opposed to impact drivers. Subsurface dampeners can also be utilized to reduce groundborne vibration. Impacts related to exposure to groundborne vibration would be less than significant with implementation of local environmental review procedures. No impacts will be associated with vibration as no policy changes, developments, or infrastructure improvements are proposed as part of the Housing Element update.

C) **Less than Significant Impact.** Residential land uses typically do not produce excessive noise either individually or cumulatively that could substantially increase existing, ambient noise levels. The future development of the Inventory Sites could increase ambient noise levels due to increased traffic generation in the project vicinity. Thus, development of the Inventory Sites will partially contribute to the noise volumes identified in the General Plan EIR. General Plan EIR Mitigation Measure N-3 requires the City to review development proposals per CEQA, which includes the analysis of vehicular traffic noise. The proposed Housing Element does not include changes to land uses and intensities designated in the current General Plan and analyzed in the EIR. The Housing Element does not propose any specific development or any land use changes that would invalidate this prior finding or further increase traffic levels beyond those analyzed in the General Plan EIR. Project-specific increases in ambient noise levels due to future development on each Inventory Site will be evaluated as development is proposed over the long term pursuant to existing policies and procedures. With these existing policies and procedures in place, impacts related to increases in ambient noise levels will be less than significant.

D) **Less than Significant Impact.** The proposed Housing Element update does not authorize the development or redevelopment of any particular site but does include policies that could facilitate development of future housing. Temporary increases in local noise levels will be associated with construction activities. The updated Housing Element will not result in any new or more severe temporary noise impacts associated with residential construction, as the Housing Element does not propose land uses or intensities not already designated in the General Plan and analyzed in the EIR. Continued enforcement of the City's noise restrictions will reduce temporary noise impacts to less-than-significant levels.

E-F) **No Impact.** The City of Reedley is not located within two miles or within a comprehensive land use plan for any public or private airport. In addition, no private airstrips are located within the City. No specific new development is associated with the proposed Housing Element update, and no changes to safety policies related to air traffic are proposed. No impacts will occur.

13. POPULATION AND HOUSING

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
A) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☐	☒
B) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒
C) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

A) **No Impact.** Adoption and implementation of the Housing Element will not, in and of itself, directly result in population growth. Population growth is a complex interaction of immigration, emigration, births, deaths, land use, and economic factors of which the General Plan and Housing Element are only a part. Regional models of population growth and change, accounting for these complexities, are developed by the California Department of Housing and Community Development (HCD) and Fresno Council of Governments (COGs). The proposed Housing Element update is designed to guide and accommodate the City's share of the projected regional population growth and associated housing over the next eight years. Pursuant to Government Code 65584, the California Department of Housing and Community Development (HCD) is required to determine the Regional Housing Needs Allocation (RHNA), by income category, for Council of Governments (COGs) throughout the State. The RHNA is based on the California Department of Finance population projections and regional population forecasts used in preparing regional transportation plans. COGs are required to allocate to each locality a share of housing need totaling the RHNA for each income category. The RHNA is based on the California Department of Finance population projections and regional population forecasts used in preparing regional transportation plans. COGs are required to allocate to each locality a share of housing need totaling the RHNA for each income category. The population in the City of Reedley is projected to increase by 21,142 residents between 2010 and 2030. As discussed in the project description, housing need is projected to grow by 1,311 units over the next eight years to accommodate the projected population growth. Based on a RHNA allocation of 1,311, the Housing Element update will result in an increase of approximately 4,995 new residents (based on Reedley's average household size of 3.81 for renter-occupied units).[27] The proposed Housing Element is the direct implementation of State requirements to account for population growth and housing needs. The proposed Housing Element and Inventory Sites are projected to meet the City's housing demand as identified in the RHNA (1,311 units). Considering that the Housing Element identifies adequate land and planning mechanisms to accommodate the future housing needs of the growing population derived directly from the population growth estimates for the region, the proposed housing Element could not induce population growth. No impact will occur.

B-C) **No Impact.** The proposed Housing Element update is intended encourage and facilitate housing development and preserve and enhance existing housing stock. The natural recycling of land will not result in the loss of housing units because such redevelopment will result in the development of new housing units. Thus, the availability of residential units in response to increases in population is supported by the Housing Element. Considering residential units will increase naturally as guided

[27] United States Census. American FactFinder. Profile of General Population and Housing Characteristics: 2010 –Reedley, California. http://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?src=CF [December 10, 2015]

by the goals and policies of the proposed Housing Element, no impacts related to the displacement of housing or people could occur.

14. PUBLIC SERVICES

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
A) Fire protection?	☐	☐	☒	☐
B) Police protection?	☐	☐	☒	☐
C) Schools?	☐	☐	☒	☐
D) Parks?	☐	☐	☒	☐
E) Other public facilities?	☐	☐	☒	☐

A) **Less than Significant Impact.** The Reedley Fire Department provides fire protection emergency services to the City and the unincorporated areas around the City with aid provided by the Fresno County Fire Protection District. According to the General Plan EIR, the Fire Department anticipates that upon build-out of the Planning Area, additional fire stations to house additional equipment and staff will need to be constructed. The General Plan EIR identifies two potential locations for additional fire stations: the corner of Parlier Avenue and Buttonwillow Avenue in the northeast quadrant of the city and a site near Cricket Hollow Park at the 1100 block of West Olson in the southwest. The actual location of new and expanded fire facilities will depend on the pattern or growth that occurs within the city limits and SOI, which is not known at this time. Future fire stations will be required in order to meet the anticipated increase in demand to ensure adequate levels of service and response times within the Planning Area. The effects of constructing and operating a new fire station are typical of any development project, such as pollutant emissions from use of construction equipment and staff vehicle trips, changes in the visual character of the station site in the context of the neighborhood, and increased vehicle trips on local roadways. Fire stations also result in the specific effect of generating periodic increases in noise from use of fire engine and emergency vehicle sirens. The City of Reedley also collects Development Impact Fees to offset the impact of new development, as it occurs. Construction and operation of a new fire station will be subject to preliminary environmental review pursuant to CEQA and if found not to be exempt, subject to full environmental analysis at which time all environmental issues will be vetted and appropriate mitigation incorporated, if needed. Potential impacts resulting from the effects of constructing and operating future fire facilities will be less than significant with implementation of existing regulations.

B) **Less than Significant Impact.** The Reedley City Police Department provides police protection services to the City. The Fresno County Sheriff's Department provides service in the unincorporated areas of the County, which includes the Reedley SOI. According to the General Plan EIR, the Police Department anticipates that upon build-out of the Planning Area, additional police facilities to house additional equipment and officers will need to be constructed. The locations of future facilities are not known at this time. Future stations will be required in order to maintain an acceptable level of service. The effects of constructing and operating a new police station are typical of any development project, such as pollutant emissions from use of construction equipment and staff vehicle trips, changes in the visual character of the station site in the context of the neighborhood, and increased vehicle trips on local roadways. Police stations also result in the specific effect of generating periodic increases in noise from use of sirens, although typically sirens will be initiated while on patrol as opposed to directly initiating from the substation. The City of Reedley also collects Development Impact Fees to offset the impact of new development, as it occurs. Construction and operation of a new substation will be subject to preliminary environmental review pursuant to CEQA and if found not to be exempt, subject to full environmental analysis at which time all environmental issues

will be vetted and appropriate mitigation incorporated, if needed. Potential impacts resulting from the effects of constructing and operating future police facilities will be less than significant with implementation of existing regulations.

C) **Less than Significant Impact.** The Kings Canyon Unified School District is a public school system that provides kindergarten through 12th grade education for the cities of Reedley and Orange Cove. and the foothill and mountain communities of Navelencia, Squaw Valley, Dunlap, and Miramonte. The effects of schools that can result in environmental impacts are specific and include peak traffic levels occurring in the morning and early afternoon, playground noise, and field lighting. Furthermore, analyses of school impacts are unique in that any impacts resulting from the effects of schools are considered fully mitigated through the payment of development impact fees pursuant to the Leroy F. Green School Facilities Act; therefore, pursuant to State law and the payment of development impact fees, impacts will be less than significant.

D) **Less than Significant Impact.** Pursuant to State law, the City imposes parkland dedication or in-lieu fees on new development equivalent to four acres of parkland per 1,000 new residents. The proposed Housing Element will generate new or relocated residents that will require park and recreation facilities and associated programs, either through expansion of existing facilities or construction of new facilities. Construction or expansion of parks can result in nominal effects such as pollutant emissions from construction activities and operational trip generation potentially resulting in similarly nominal impacts to the environment. The City will continue to collect in-lieu fees or require construction of new or expanded parks from proponents of new housing to compensate for incremental increases in parks and recreation service demand, thus providing adequate, per-capita facilities for future residents. The City of Reedley also collects Development Impact Fees to offset the impact of new development, as it occurs. Construction and operation of new or expanded parks and recreation facilities will be subject to preliminary environmental review pursuant to CEQA and if found not to be exempt, subject to full environmental analysis at which time all environmental issues will be vetted and appropriate mitigation incorporated, if needed. Potential impacts resulting from the effects of constructing and operating future parks and recreation facilities will be less than significant with implementation of existing regulations.

E) **Less than Significant Impact.** New or relocated residents generated by the provision of new housing guided by the goals and policies of the proposed Housing Element will generate the incremental need for a variety of public and quasi-public services including libraries, medical clinics, urgent care facilities, hospitals, social service centers, senior centers, and other facilities. Construction and operation of new or expanded public service facilities will be subject to preliminary environmental review pursuant to CEQA and if found not to be exempt, subject to full environmental analysis at which time all environmental issues will be vetted and appropriate mitigation incorporated, if needed. Potential impacts resulting from the effects of constructing and operating future public service facilities will be less than significant with implementation of existing regulations.

15. RECREATION

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

A-B) **Less than Significant Impact.** Pursuant to State law, the City imposes parkland dedication or in-lieu fees on new development equivalent to four acres of parkland per 1,000 new residents. The proposed Housing Element will generate new or relocated residents that will require park and recreation facilities and associated programs, either through expansion of existing facilities or construction of new facilities. Construction or expansion of parks can result in nominal effects such as pollutant emissions from construction activities and operational trip generation potentially resulting in similarly nominal impacts to the environment. The City will continue to collect in-lieu fees or require construction of new or expanded parks from proponents of new housing to compensate for incremental increases in parks and recreation service demand, thus providing adequate, per-capita facilities for future residents. Construction and operation of new or expanded parks and recreation facilities will be subject to preliminary environmental review pursuant to CEQA and if found not to be exempt, subject to full environmental analysis at which time all environmental issues will be vetted and appropriate mitigation incorporated, if needed. Potential impacts resulting from the effects of constructing and operating future parks and recreation facilities will be less than significant with implementation of existing regulations.

16. TRANSPORTATION AND TRAFFIC

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
A) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	☐	☐	☒	☐
B) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	☐	☐	☒	☐
C) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	☐	☐	☐	☒
D) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☒
E) Result in inadequate emergency access?	☐	☐	☒	☐
F) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	☐	☐	☐	☒

A-B) **Less than Significant Impact.** The City is served by local transportation facilities including streets, railways, and bus routes in addition to non-motorized transportation facilities such as sidewalks, trails, and bikeways. These facilities provide options for travel modes that include passenger vehicles, trains, buses, bikes, and walking. This facilities and modes of travel comprise the circulation system for the City, and the broader system, designed with the goals of efficiently moving people and goods throughout the region by providing ease of access to multiple modes of travel.

Future housing development will primarily generate passenger vehicle trips that will disperse during the morning as residents drive to commercial, industrial, and institutional facilities for a variety of reasons but primarily for work and school. Some trips may be to transit centers, such that a portion of a resident's trip may include alternative transportation modes, while others may simply walk to their destination or to other transit options. The return leg of a trip is generally anticipated to be the reverse of the initial leg of the trip during the afternoon, albeit with higher likelihood of a portion of the trip being dedicated to accessing shopping, entertainment, or other uses. According to the Institute of Transportation Engineers (ITE) *Trip Generation Manual*, single-family homes generate 9.52 daily trips per dwelling unit, with 7.6 percent of those trips occurring during morning peak

hours and 10.5 percent occurring during afternoon peak hours.[28] Apartments generate 6.65 daily trips per dwelling unit with 7.7 percent occurring during morning peak hours and 9.3 percent occurring during the afternoon peak hour. The concern regarding transportation facilities and their counterpart modes of travel is excessive use throughout the day or during morning and/or afternoon peak hours and the resulting effects on the performance of the facilities' ability to move people and goods. The direct effects of reduced circulation system performance are annoyance and stress, thereby decreasing the quality of life for the user. Direct failure or accelerated deterioration of circulation system facilities can also occur if the facility was not designed to function under increased loading. A variety of indirect impacts to human health and the environment are attributed specifically to excessive use of vehicles on local and regional roadways including effects related to air pollution and ambient noise.

Three planning efforts guide the long-term improvement of the circulation system at the regional and local levels. The Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS) is administered by the Fresno Council of Governments (COG) as a comprehensive assessment of all travel modes in Fresno County and the needs of travel and goods movement through the year 2040.[29] The Congestion Management Process (CMP) is also administered by Fresno COG in lieu of a congestion management program that was opted out of in 1997.[30] The CMP addresses congestion management through a process developed cooperatively throughout the metropolitan region that provides for safe and effective management and operation of existing and future transportation facilities through demand reduction and operations strategies. While the RTP/SCS addresses the broader goals of the transportation network, the CMP focuses on specific, regional facilities requiring funding for maintenance and improvements in order to meet the goals of the RTP/SCS. The CMP relies on local jurisdiction standards in determining the performance of the CMP network and notes that the Cities of Fresno and Clovis have adopted the Level of Service (LOS) D standard, and the County and other Cities have adopted the LOS C standard. *Level of Service* is a qualitative expression of the performance of a transportation facility, at an intersection or roadway segment, determined by the ratio of vehicles to the facility capacity or the length of delay a driver must wait to pass through a facility. In terms of the CMP, the volume-to-capacity (V/C) ratio at roadway and highway intersections is used. The COG is currently in the process of updating the CMP. The final effort is the City's General Plan Circulation Element that identifies long-term transportation improvements for local facilities. The General Plan includes goals and policies aimed to provide an efficient multi-modal circulation system in the city. General Plan policies also encourage the development of an efficient and safe bikeway and public transportation system. The City of Reedley has defined LOS C as its minimum acceptable roadway performance standard.

Local and regional planning efforts are designed to reduce the direct and indirect effects of travel so as to minimize or avoid resulting impacts on human health and the environment. The proposed Housing Element is consistent with the growth assumptions used in the development of the RTP/SCS and CMP and the does not include any land use changes to the General Plan; therefore, the Housing Element will not conflict with the goals of transportation planning efforts of the City or the COG. Furthermore, according to the General Plan EIR, implementation of General Plan Policies will avoid or reduce impacts of General Plan build out on the performance of the roadway system.

Based on this preceding analysis, future housing development will not impede local or regional efforts to ensure an efficient circulation system. Future Housing Development will be subject to preliminary environmental review pursuant to CEQA and if found not to be exempt, subject to full environmental analysis at which time all environmental issues will be vetted and appropriate mitigation incorporated, if needed, should transportation impacts be identified that are not covered under existing or future development impact fees. Potential impacts resulting from conflicts with local and regional transportation plans and performance requirements will be less than significant with implementation of existing standards and regulations.

C) **No Impact.** The updated Housing Element is focused on achieving local housing objectives and does not authorize any construction or permit increases in residential heights that would result in the need to redirect or otherwise alter air traffic patterns. No impacts wills occur.

---

28 Institute of Transportation Engineers. Trip General Manual. 9th Ed. 2012

29 Fresno Council of Governments. Regional Transportation Plan and Sustainable Communities Strategy. June 2014

30 Fresno Council of Governments. Fresno County Congestion Management Process. October 2009

D) **No Impact.** The Housing Element update does not authorize the construction of any roadway and will result in no effects on the design of existing or future streets. No impacts will occur.

E) **Less than Significant Impact.** The project does not involve any road construction or any development activity and thus will not obstruct or restrict emergency access to or through the City. Future housing development facilitated by implementation of Housing Element policies will be subject to site plan review and approval during entitlement review and/or application for building permits. The Fire Department reviews all plans to ensure compliance with all applicable emergency access and safety requirements. Impacts involving emergency access will be less than significant with continued implementation of development review procedures.

F) **No Impact.** The project includes programs and policies in support of the development of new housing units to meet the City's regional fair share of housing, as required by State law. The Housing Element is consistent with regional and local transportation plans the promote a holistic transportation system that embodies all modes of travel; therefore, the Housing Element will not conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities. No impacts will occur.

17. UTILITIES AND SERVICE SYSTEMS

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
A) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☐	☒
B) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☐	☒
C) Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☐	☒
D) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	☐	☐	☐	☒
E) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☐	☒
F) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☒	☐
G) Comply with federal, state, and local statutes and regulations related to solid waste?	☐	☐	☐	☒

A) **No Impact.** Future housing will generate wastewater from bathroom and kitchen activities that will be conveyed via the sewer system. Wastewater for the City of Reedley is treated at the City of Reedley wastewater treatment plant (WWTP), operated by the City. The Central Valley Regional Water Quality Control Board (RWQCB) issued wastewater treatment requirements for the WWTF in Order R5-2010-0120. The facility is subject to the permit requirements that establish pollutant limits for effluent discharges to receiving waters. A violation of the WWTP permit requirements would occur if effluent discharges exceeded adopted limits for one or more pollutants or if the daily maximum permitted treatment volume is exceeded and excess discharge is released into downstream water bodies. According to the General Plan EIR, in anticipation of increased population by the year 2030, the WWTP completed improvements that increased the capacity of the WWTP to 7.0 million gallons of wastewater per day (mgd). Future housing development, consistent with current General Plan land use policy, will result in typical wastewater discharges and will not require new methods or equipment for treatment that are not currently permitted for the existing treatment facility. Furthermore, residential development is not subject to point-source discharge requirements. The Housing Element and future housing development will not affect compliance with RWQCB treatment requirements. No impact will occur.

B, D-E) **No Impact.** The Reedley wastewater treatment plant (WWTP) has recently been expanded to accommodate anticipated increases in population by the year 2030. The expanded plant capacity is 7.0 mgd and was determined to be sufficient to accommodate General Plan build out according to the General Plan EIR. The Housing Element is consistent with the General Plan and regional population projections, and thus, the Housing Element is consistent with the master planning efforts of the Reedley Public Works Department to ensure adequate treatment capacity and technologies to serve existing plus future residents. Similarly, the Public Works Water Division pumps an average of 5.3 mgd of groundwater. According to the City's 2010 Urban Water Management Plan (UWMP), there is sufficient supply to accommodate demand in year 2025 under normal conditions. Under single-year and multiple-year dry conditions, adequate supply is also demonstrated. The Housing Element is consistent with regional growth assumptions, and thus, the population accommodated by future housing has been accounted for in the 2010 UWMP. Considering adequate water supply and wastewater treatment capacity has been demonstrated over the next eight to ten years, new water or wastewater treatment facilities will not be required solely to serve the project. Considering no new facilities will be required to be constructed or supply to be acquired, no impacts will occur.

C) **No Impact.** Current National Pollution Discharge Elimination System (NPDES) regulations focus on low impact development standards in addition to the standard "no net increase in runoff into the storm drain system". Any incremental increases in urban runoff generated from future housing development will be required to be retained or otherwise stored on site; therefore, no increase in stormwater flows will occur that will require the need to expand or construct any storm drain or flood control facility. No impacts will occur.

F) **Less than Significant Impact.** According to the General Plan EIR, the City of Reedley Solid Waste Division provides solid waste collection services to the City. Solid waste that is not diverted due to recycling is primarily disposed of at the Avenal Regional Landfill followed by the Visalia Disposal Site.[31] There are a variety of other landfills that serve the City on a much more limited basis.

G) **No Impact.** All new development will be required to comply with State mandates and City regulations regarding reduction/recycling of household waste. None of the proposed housing strategies in the proposed Housing Element update will have any effect upon or result in any conflicts with solid waste disposal regulations, as the scope of these revisions does not increase development capacity. No impact will occur.

[31] California Department of Resources Recycling and Recovery. Disposal Reporting System: Jurisdiction Profile: Fresno – Reedley. http://www.calrecycle.ca.gov/LGCentral/Reports/Viewer.aspx?P=ReportYear%3d2014%26ReportName%3dReportEDRSJurisDisposalByFacility%26OriginJurisdictionIDs%3d400 [December 8, 2015]

18. MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☐	☒	☐
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☐	☒	☐
c) Does the project have environmental effects which would cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

A) **Less than Significant Impact.** The results of the preceding analysis indicate that the proposed project will have less-than-significant impacts to sensitive biological, historical, archaeological, and paleontological resources. Impacts to scenic vistas and visual character and resources will be less than significant. Considering the programmatic level of analysis will not authorize any development plan, redevelopment of any existing sites, or construction of new infrastructure, and will not change existing City land use policy regarding locations or intensities of development, it will not result in any effects that would degrade the quality of the environment. The City finds that impacts related to degradation of the environment will be less than significant with mitigation incorporated.

B) **Less than Significant Impact.** Cumulative effects resulting from full implementation of City land use policies were evaluated in the General Plan EIR. The proposed Housing Element update will not change any of these policies and does not propose any specific development or redevelopment project that could contribute to short-term or long-term cumulative impacts that were not addressed sufficiently in the General Plan EIR. The proposed project does not include any changes to land use designations and thus is consistent with the project analyzed in the General Plan EIR. The City hereby finds that the proposed Housing Element's individual contribution to potentially significant cumulative impacts is not considerable.

C) **Less than Significant Impact.** As supported by the preceding environmental evaluation, the project will not result in substantial adverse effects on human beings. It has been determined through quantitative and qualitative analysis supported by substantial evidence that the proposed Housing Element has been determined to have little or no adverse impacts on people or the environment as evaluated in the 17 preceding environmental topics. The City hereby finds that direct and indirect impacts on human beings will be less than significant.

5 LIST OF PREPARERS

LEAD AGENCY

City of Reedley
Department of Community Development
1733 9th Street
Reedley, California 93654
559-637-4200

Kevin Fabino, Director
Ellen Moore, Assistant Planner

ENVIRONMENTAL ANALYSTS

MIG
1500 Iowa Avenue, Suite 110
Riverside, California 92507
951-787-9222

Christopher Brown, Director of Environmental Services
Olivia Chan, Associate Analyst II
Amanda North, Technician