



# CITY of CLOVIS

## AGENDA • CITY COUNCIL MEETING

Council Chamber, 1033 Fifth Street, Clovis, CA 93612 (559) 324-2060  
[www.cityofclovis.com](http://www.cityofclovis.com)

October 17, 2022

6:00 PM

Council Chamber

In compliance with the Americans with Disabilities Act, if you need special assistance to access the City Council Chamber to participate at this meeting, please contact the City Clerk or General Services Director at (559) 324-2060 (TTY – 711). Notification 48 hours prior to the meeting will enable the City to make reasonable arrangements to ensure accessibility to the Council Chamber.

The Clovis City Council meetings are open to the public at the physical address listed above. There are numerous ways to participate in the City Council meetings: you are able to attend in person; you may submit written comments as described below; you may participate by calling in by phone (see “Verbal Comments” below); and you may view the meeting which is webcast and accessed at [www.cityofclovis.com/agendas](http://www.cityofclovis.com/agendas).

### Written Comments

- Members of the public are encouraged to submit written comments at: [www.cityofclovis.com/agendas](http://www.cityofclovis.com/agendas) at least two (2) hours before the meeting (4:00 p.m.). You will be prompted to provide:

- Council Meeting Date
- Item Number
- Name
- Email
- Comment



- Please submit a separate form for each item you are commenting on.
- A copy of your written comment will be provided to the City Council noting the item number. If you wish to make a verbal comment, please see instructions below.
- Please be aware that any written comments received that do not specify a particular agenda item will be marked for the general public comment portion of the agenda.
- If a written comment is received after 4:00 p.m. on the day of the meeting, efforts will be made to provide the comment to the City Council during the meeting. However, staff cannot guarantee that written comments received after 4:00 p.m. will be provided to City Council during the meeting. All written comments received prior to the end of the meeting will be made part of the record of proceedings.

## **Verbal Comments**

- If you wish to speak to the Council on an item by telephone, you should contact the City Clerk at (559) 324-2060 no later than 4:00 p.m. the day of the meeting.
- You will be asked to provide your name, phone number, and your email. You will be emailed instructions to log into Webex to participate in the meeting. Staff recommends participants log into the Webex at 5:30 p.m. the day of the meeting to perform an audio check.
- All callers will be placed on mute, and at the appropriate time for your comment your microphone will be unmuted.
- In order for everyone to be heard, please limit your comments to 5 minutes or less, or 10 minutes per topic

## **Webex Participation**

- Reasonable efforts will be made to allow written and verbal comment from a participant communicating with the host of the virtual meeting. To do so, a participant will need to chat with the host and request to make a written or verbal comment. The host will make reasonable efforts to make written and verbal comments available to the City Council. Due to the new untested format of these meetings, the City cannot guarantee that these written and verbal comments initiated via chat will occur. Participants desiring to make a verbal comment via chat will need to ensure that they accessed the meeting with audio transmission capabilities.

## **CALL TO ORDER**

### **FLAG SALUTE - Councilmember Bessinger**

## **ROLL CALL**

**PUBLIC COMMENTS** - This is an opportunity for the members of the public to address the City Council on any matter within the City Council's jurisdiction that is not listed on the Agenda. In order for everyone to be heard, please limit your comments to 5 minutes or less, or 10 minutes per topic. Anyone wishing to be placed on the Agenda for a specific topic should contact the City Manager's office and submit correspondence at least 10 days before the desired date of appearance.

**ORDINANCES AND RESOLUTIONS** - With respect to the approval of resolutions and ordinances, the reading of the title shall be deemed a motion to waive a reading of the complete resolution or ordinance and unless there is a request by a Councilmember that the resolution or ordinance be read in full, further reading of the resolution or ordinance shall be deemed waived by unanimous consent of the Council.

**CONSENT CALENDAR** - Items considered routine in nature are to be placed upon the Consent Calendar. They will all be considered and voted upon in one vote as one item unless a Councilmember requests individual consideration. A Councilmember's vote in favor of the Consent Calendar is considered and recorded as a separate affirmative vote in favor of each action listed. Motions in favor of adoption of the Consent Calendar are deemed to include a motion to waive the reading of any ordinance or resolution on the Consent Calendar. For adoption of

ordinances, only those that have received a unanimous vote upon introduction are considered Consent items.

- [1.](#) Administration - Approval - Minutes from the October 3, 2022, Council Meeting.
- [2.](#) Finance - Approval – Res. 22-\_\_\_\_, Amending the 2022-23 Budget to reappropriate carryover funding from the 2021-22 budget.
- [3.](#) General Services – Approval - Claim Rejection of the General Liability Claim on behalf of Dianne Smith.
- [4.](#) General Services – Approval - Res. 22-\_\_\_\_, Authorizing Amendments to the City’s Classification and Compensation Plans to Adopt both an Information Technology Cybersecurity Analyst and a Finance Business Systems Analyst Classification with a Salary Range of \$8,514 to \$10,349 per month for both positions; and Approval – Res. 22-\_\_\_\_, Amending the City’s FY 22-23 Position Allocation Plan.
- [5.](#) General Services – Approval – Res. 22-\_\_\_\_, Authorizing Amendments to the City’s Classification and Compensation Plans to Adopt the Principal Utilities Engineer Classification with a Salary Range of \$11,795 to \$14,337 per month, and Approval – Res. 22-\_\_\_\_, Amending the City’s FY 22-23 Position Allocation Plan.
- [6.](#) Planning and Development Services – Approval – Bid Award for CIP 17-13 Nees Avenue Street Widening and Authorize the City Manager to Execute the Contract on behalf of the City.
- [7.](#) Planning and Development Services - Approval – Final Acceptance for CIP 21-04, Loma Vista Village Green Offsite Improvements.

**PUBLIC HEARINGS** - A public hearing is an open consideration within a regular or special meeting of the City Council, for which special notice has been given and may be required. When a public hearing is continued, noticing of the adjourned item is required as per Government Code 54955.1.

- [8.](#) Consider Various Actions Related to the Public Utilities Director Position:
  - a. Consider Introduction - Ord. 22-\_\_\_\_, An Ordinance of the City Council of the City of Clovis amending Article 5 Department of Public Utilities, Sections 2.2.501 and 2.2.502, and adding sections 2.2.503 and 2.2.504 of Chapter 2.2 (Officers and Employees) of the Clovis Municipal Code Pertaining to the Department of Public Utilities and the Position of Public Utilities Director, and
  - b. Consider Approval - Res. 22-\_\_\_\_, Authorizing Amendments to the Public Utilities Director Classification within the Public Utilities Department.

**Staff:** Lori Shively, Personnel/Risk Manager  
**Recommendation:** Approve

- [9.](#) Consider items related to the incorporation of vehicle miles traveled (VMT) into the General Plan Circulation Element. City of Clovis, applicant.
  - a. Consider Approval – Res. 22-\_\_\_\_, A request to certify a supplemental environmental impact report, adopt findings of fact, and adopt a mitigation monitoring and reporting program.

b. Consider Approval – Res. 22-\_\_\_\_, GPA2022-003, A request to amend the 2014 General Plan to incorporate policy changes to the Circulation Element to incorporate provisions related to the vehicle miles traveled traffic impact evaluation criterion.

c. Consider Approval – Res. 22-\_\_\_\_, A request to adopt updated transportation impact analysis guidelines.

**Staff:** Dave Merchen, City Planner

**Recommendation:** Approve

**ADMINISTRATIVE ITEMS** - Administrative Items are matters on the regular City Council Agenda other than Public Hearings.

10. Consider Approval – Implementation of Clovis Transit Program to Carry Narcan on Transit Vehicles.

**Staff:** Amy Hance, General Services Manager

**Recommendation:** Approve

## **COUNCIL ITEMS**

11. Consider Update – Hotel Parking Ratios.

**Staff:** Dave Merchen, City Planner

**Recommendation:** Consider Update

## **CITY MANAGER COMMENTS**

## **COUNCIL COMMENTS**

## **ADJOURNMENT**

## **MEETINGS AND KEY ISSUES**

Regular City Council Meetings are held at 6:00 P.M. in the Council Chamber. The following are future meeting dates:

Nov. 7, 2022 (Mon.)

Nov. 14, 2022 (Mon.)

Nov. 21, 2022 (Mon.) (To Be Cancelled)

Dec. 5, 2022 (Mon.)

Dec. 12, 2022 (Mon.)

Dec. 19, 2022 (Mon.)

**CLOVIS CITY COUNCIL MEETING**

**October 3, 2022**

**6:00 P.M.**

**Council Chamber**

Meeting called to order by Mayor Flores at 6:03  
Flag Salute led by Councilmember Whalen

Roll Call: Present: Councilmembers Ashbeck, Mouanoutoua, Whalen  
Mayor Flores  
Absent: Councilmember Bessinger

**PUBLIC COMMENTS – 6:04**

Steve Traveno, resident, shared concerns regarding increasing traffic Sunnyside and Fowler Avenues and the potential for accidents with pedestrians. He also expressed his disappointment that when he called the Police Department to report a man sleeping on the side of the road no one showed up.

Karen Taylor, resident, shared that she believed various statues in Old Town Clovis should be removed and commented on various subjects.

**CONSENT CALENDAR – 6:15**

Motion by Councilmember Ashbeck, seconded by Councilmember Whalen that the items on the Consent Calendar be approved, including the waiver of the reading of the ordinance. Motion carried 4-0-1, with Councilmember Bessinger absent.

1. Administration - Approved - Minutes from the September 12, 2022 and the September 19, 2022 Council Meetings.
2. Administration - Adopted - Ord. 22-08, Rezone 2021-001 and R2021-003, A request to establish a Master Plan Community (MPC) Overlay District in conjunction with Home Place Master Plan and a request to prezone properties within the boundaries of the Home Place Master Plan to a combination of base zone districts to implement the land uses identified in the Home Place Master Plan. (Vote: 5-0)
3. Finance – Received and Filed – Investment Report for the Month of June 2022.
4. Finance – Received and Filed – Treasurer’s Report for the Month of June 2022.
5. General Services – Approved – **Res. 22-110**, Authorizing the Execution of the Certifications and Assurances for the FY 2022-23 California State Transit Assistance State of Good Repair Program.
6. General Services – Approved – **Res. 22-111**, Authorizing Amendments to the City Engineer Classification in the Planning and Development Services Department.
7. General Services – Approved – **Res. 22-112**, Authorizing Amendments to the Lead Bus Driver Classification and Compensation Plan in the General Services Department.
8. Planning and Development Services - Approved – **Res. 22-113**, Annexation of Miscellaneous Properties to the Landscape Maintenance District No. 1.

**COUNCIL ITEMS – 6:18**

6:18 – ITEM 10 - APPROVED APPOINTMENT – FRESNO COUNTY TRANSPORTATION AUTHORITY URBAN AT LARGE BOARD MEMBER.

Motion for approval by Councilmember Ashbeck, seconded by Councilmember Mouanoutoua. Motion carried 4-0-1, with Councilmember Bessinger absent.

**PUBLIC HEARINGS – 6:21**

6:21 – ITEM 9 - CONDUCT – AN APPEAL HEARING REGARDING THE ENTERTAINMENT PERMIT SUSPENSION FOR THE PALACE NIGHTCLUB LOCATED AT 446 CLOVIS AVENUE, CLOVIS, CA 93612.

Cesar Lossley, Co-owner of The Palace, spoke in support of approving the appeal.

Jeremy Sylvas, Employee of The Palace, spoke in support of approving the appeal.

Claudia Lossley, Co-owner of The Palace, spoke in support of approving the appeal.

Motion to deny the appeal and uphold the suspension as recommended by the Police Chief by Councilmember Ashbeck, seconded by Councilmember Mouanoutoua. Motion carried 4-0-1, with Councilmember Bessinger absent.

**COUNCIL ITEMS – 8:17**

8:17 – ITEM 11 - APPROVED – CHANGE OF COUNCIL MEETING SCHEDULE.

Motion for approval by Councilmember Ashbeck, seconded by Councilmember Whalen. Motion carried 4-0-1, with Councilmember Bessinger absent.

8:18 – ITEM 12 - APPROVED - DRAFT LETTERS OF SUPPORT REQUESTING THE ABILITY TO CONDUCT INTERVIEWS FOR THE GLOBAL ENTRY PROGRAM AT THE FRESNO YOSEMITE INTERNATIONAL AIRPORT.

Motion for approval by Councilmember Whalen, seconded by Councilmember Mouanoutoua. Motion carried 4-0-1, with Councilmember Bessinger absent.

**CITY MANAGER COMMENTS – 8:21**

**COUNCIL COMMENTS – 8:21**

**CLOSED SESSION – 8:26**

8:26 – ITEM 13 - GOVERNMENT CODE SECTION 54957.6 CONFERENCE WITH LABOR NEGOTIATORS AGENCY DESIGNATED REPRESENTATIVES: JOHN HOLT, ANDREW HAUSSLER, SHONNA HALTERMAN, SCOTT G. CROSS EMPLOYEE ORGANIZATION: CLOVIS FIREFIGHTERS ASSOCIATION

Mayor Flores adjourned the meeting of the Council to October 17, 2022

Meeting adjourned: 9:00 p.m.

---

Mayor

---

City Clerk



# CITY *of* CLOVIS

## REPORT TO THE CITY COUNCIL

TO: Mayor and City Council

FROM: Finance Department

DATE: October 17, 2022

SUBJECT: Finance - Approval – Res. 22-\_\_\_, Amending the 2022-23 Budget to reappropriate carryover funding from the 2021-22 budget.

ATTACHMENTS: 1. Res. 22-\_\_\_, Amendments to the 2022-23 Budget  
2. Description of Projects

### **CONFLICT OF INTEREST**

None.

### **RECOMMENDATION**

That the Council approve Resolution 22-\_\_\_; Reappropriating certain Capital Projects, Services and Capital Outlays from 2021-22 to 2022-23 by Fund and Department as shown in Attachment A of Attachment 1 to the Resolution and as described in Attachment 2.

### **EXECUTIVE SUMMARY**

During the budget process, estimates are made as to projects and services expected to be completed by year-end. For a variety of reasons, some of these projects and services are not completed by June 30<sup>th</sup>. These unspent funds are available for reappropriation to the next year. This request requires Council approval as it amends the next year's budget. These projects and services will be completed during the next year.

### **BACKGROUND**

As part of the preparation of the 2022-23 Annual Budget, certain projects in the Community Investment Program, capital outlays and services in the operation budgets were estimated to be completed by June 30, 2022, or at least contracts awarded or purchase orders issued. Because of unforeseen delays or planned postponements for the purpose of cost savings, contracts or purchase orders were not awarded in Fiscal Year 2021-22 as originally anticipated. Because these projects were expected to be completed in 2021-22, they were not re-budgeted in 2022-23.



Included on Attachment 2 is a description of the projects to be reappropriated from the various departments with the reason given by the department for the request for reappropriation.

**FISCAL IMPACT**

The estimated fund balances for the year-end 2021-22 included the anticipated expenditure of funds for these items. Since these items were not encumbered and the funds not expended, the year-end balances will be higher than expected. Sufficient resources are available to cover these expenditures.

**REASON FOR RECOMMENDATION**

In order to complete the planned projects and procure the necessary items, it is necessary to reappropriate the items to Fiscal Year 2022-23 to provide the budget authorization.

**ACTIONS FOLLOWING APPROVAL**

Purchase orders or contracts for the reappropriated items will be issued, in most cases, within ninety days.

Prepared by: Gina Daniels, Assistant Finance Director

Reviewed by: City Manager *JH*

**RESOLUTION 22-\_\_**

**RESOLUTION OF THE CITY COUNCIL OF THE CITY OF CLOVIS  
APPROVING AMENDMENTS TO THE 2022-23 BUDGET**

**WHEREAS**, the City Council of the City of Clovis approved the 2022-23 Budget on June 13, 2022; and

**WHEREAS**, some capital projects were not commenced and capital outlays and services were not purchased in 2021-22; and

**WHEREAS**, the 2022-23 Budget assumed that the items would be completed and no provision was made for said items in the 2022-23 Budget and the Fund Balances were adjusted accordingly; and

**WHEREAS**, the ending June 30, 2022. Fund Balances will be greater by the amount of those items not commenced or purchased in 2021-22; and

**WHEREAS**, the Council desires that the items be completed

**NOW, THEREFORE, BE IT RESOLVED**, that the City of Clovis amend the 2022-23 Budget as provided in Attachment A for the “Summary of Expenditures by Fund” and the “Summary of Expenditures by Department.”

\* \* \* \* \*

The foregoing resolution was introduced and adopted at a regular meeting of the City Council of the City of Clovis held on October 17, 2022, by the following vote, to wit.

- AYES:
- NOES:
- ABSENT:
- ABSTAIN:

DATED:      October 17, 2022

\_\_\_\_\_  
Mayor

\_\_\_\_\_  
City Clerk

**ATTACHMENT 1**

**SUMMARY OF REVENUES BY DEPARTMENT**

<u>Department</u>	<u>Amount</u>
	\$ 0
<b>Total Revenues by Department</b>	<b>\$ 0</b>

**SUMMARY OF REVENUES BY FUND**

<u>Fund</u>	<u>Amount</u>
General	\$ 0
<b>Total Revenues by Fund</b>	<b>\$ 0</b>

**SUMMARY OF EXPENDITURES BY DEPARTMENT**

<u>Department</u>	
Fire	\$ 144,500
City Manager	4,175,000
General Services	883,000
Public Utilities	5,606,500
Planning & Development Services	20,000
Capital Improvement	<u>57,323,100</u>
<b>Total Expenditures by Department</b>	<b>\$ 68,152,100</b>

**SUMMARY OF EXPENDITURES BY FUND**

<u>Fund</u>	<u>Amount</u>
General	\$ 169,500
General Services	16,449,300
Fleet	2,816,000
Refuse	300,500
Sewer Enterprise	2,175,000
Water Enterprise	290,000
Planning & Development Services	20,000
Sewer Construction-Enterprise	1,255,300
Park Improvement	8,940,300
Street Construction	24,254,900
Water Construction- Enterprise	4,558,000
Water Construction- Developer	5,693,500
Community Sanitation-Enterprise	<u>1,229,800</u>
<b>Total Expenditures by Fund</b>	<b>\$ 68,152,100</b>

**2021 - 2022 Reappropriations**  
Operations and Capital Improvement Program

Department/Account Number	Description and Explanation	Bid Status	Amount
<b>Revenues</b>			
			<u>\$ -</u>
<b>Expenditures</b>			
<b>Fire Department</b>			
Travel - Conferences 61000 65001	Fire investigations training Delay due to the Pandemic		\$ 28,500
Travel - Meetings 61000 65002	Pre construction travel for new engine Postponed by apparatus committee		18,000
Training Education Incentive 61000 65101	Education Incentive Delay in receiving grades		48,000
Training Classes & Seminar 61000 65102	Education Incentive New classes had to be scheduled		22,000
Training Classes & Seminar 63000 65102	Protective Clothing Classes postponed due to the Pandemic		28,000
Total Fire Department			<u>\$ 144,500</u>
<b>City Manager</b>			
Information Technology			
Computer Programming 36200 63307	Software/Cloud programming services System evaluations in progress		\$ 25,000
Central Processors 36200 68201	Enterprise Resource Planning/Utility Billing System Postponed due to evaluation		4,000,000
High Speed Network Equipment 36200 68206	End of Life Replacements Delayed due to limited staff		25,000
CAD-Police Systems 36200 68260	Enterprise Law Enforcement Mgt System upgrade Product unavailable		125,000
Total City Manager Department			<u>\$ 4,175,000</u>
<b>General Services Department</b>			
Facilities			
Building Repair - Miss Winkles 33300 63417	Building Repair Limited staff availability		\$ 6,500
Building Repair - Recreation 33300 63412	Tuff Shed Limited staff availability		10,000

Department/Account Number	Description and Explanation	Bid Status	Amount
<b>General Services Department - Continued</b>			
Furnishings 33400 68103	Station #3 commercial grade washer Limited staff availability		10,000
Furnishings 33400 68103	Station #1 & #5 Refrigerators Limited staff availability		4,000
Furnishings 33400 68103	Station #5 washer/dryer replacement Limited staff availability		2,500
Safety Equipment 33400 68403	Self-contained Breathing Apparatus for Fire Limited staff availability		850,000
Total General Services Department			<b>\$ 883,000</b>

**Public Utilities Department**

<b>Street Maintenance</b>			
Signs and materials 71000 64244	Purchase street signs Backorder for signs	N/A	\$ 25,000
<b>Fleet Capital</b>			
Patrol Vehicles 75100 68701	Purchase patrol vehicles No vehicles available to purchase	N/A	250,000
Sedans & Wagons 75100 68702	Purchase of new sedan No vehicles available to purchase		26,500
Standard Pickup 75100 68710	Purchase pickups No vehicles available to purchase		88,500
Utility Trailer 75100 68716	Trailer for Central Control Unit portable restrooms Unable to purchase		17,000
Light Duty Truck 1-5 ton 75100 68720	Purchase light duty trucks No vehicles available to purchase		353,000
Heavy Duty Trucks-over 5 ton 75100 68721	Truck Purchase No vehicles available to purchase		251,000
Fire Trucks 75100 68722	Fire truck build outs Unable to purchase	N/A	130,000
Refuse Trucks 75100 68724	Purchase new trucks Unable to purchase		1,700,000
<b>Solid Waste</b>			
Repair & Maint Corp Yard 76100 63459	Roofing & office improvements Construction delay		75,000

Department/Account Number	Description and Explanation	Bid Status	Amount
<b>Public Utilities Department - Continued</b>			
Green waste Containers 76100 68513	Purchase green waste containers Unable to purchase		52,900
Marketing Services 76100 63304	Marketing Services Project delay		60,000
Specialty Equipment 76100 68750	Purchase specialty equipment Unable to purchase		72,600
Landfill Materials & Supplies 76200 64235	Hauling of asphalt concrete grindings Project delay	Bid	40,000
<b>Sewer</b>			
Sewer Plant & Facilities 76500 63314	Operations & Maintenance increase Increased costs due to flow increase	N/A	100,000
Repair & Maint Corp Yard 76500 63459	Roofing & office improvements Construction delay		75,000
Plant and Trunk Capital 76500 73015	Regional plant capital projects Regional plant project delayed		2,000,000
<b>Water</b>			
Repair & Maint Corp Yard 77000 63459	Roofing & office improvements Construction delay		75,000
Specialty Equipment 77000 68750	Various specialty equipment Unable to purchase		215,000
Total Public Utilities Department			<b>\$ 5,606,500</b>
<b>Planning &amp; Development Services</b>			
Consulting Services 74100 63301	Affordable Housing Project/Strategy Delay in finding provider		\$ 20,000
Total Planning & Development Services			<b>\$ 20,000</b>
<b>Community Investment Department</b>			
<b>Government Facilities</b>			
Fire Station #2 - Training Facility 90000 71058	Build temporary training building In construction		\$ 363,000
Fire Station #2 Rebuild 90000 71059	Rebuild the existing Fire Station 2 In design, not bid yet		8,424,000

Department/Account Number	Description and Explanation	Bid Status	Amount
<b>Government Facilities - Continued</b>			
Fire Station #4 - Remodel 90000 71079	Kitchen Remodel Limited staff availability		64,700
San Gabriel Park - Restroom Reroof 90000 71087	Restroom reroof In progress, no bid necessary		50,000
Landmark Square - Library District 90000 71324	Civic Center North site improvements In construction		957,100
Landmark Square - Senior Center 90000 71325	Civic Center North site imprvmnts/Senior Center In construction		368,700
Senior Ctr Exterior Beam Replace 90000 71342	Replace exterior beams on existing Senior Center In design, not bid yet		115,300
Civic Center Landscape 90000 71361	Design for City Hall/Civic Ctr Campus Improvements In design, not bid yet		118,400
Civic Center ADA Improvements 90000 71392	Civic Center American Disability Act Improvements In design, not bid yet		118,700
Transit Station 90000 71428	Construct new Transit Building In construction		429,000
Fire Station #6 90000 71435	Fire Station #6 In construction		76,400
Fiber Optics Installation 90000 71450	Miscellaneous fiber installations In progress, no bid necessary		30,000
Public Safety Facility Flooring Repair 90000 71453	Replace Flooring at Public Safety Bldg In progress, no bid necessary		35,000
Old Town Streetscape Imprvmnts 90000 71460	Add tree wells on Pollasky Avenue In construction		17,900
Fiber Optic Install to Fire Station 6 90000 71465	Fiber Optic Installation to Fire Station 6 In construction		158,400
Letterman Park Irrigation System 90000 75191	Replace Irrigation System In design, not bid yet		64,700
<b>Sewer Capital Projects - Developer Fund</b>			
Shaw Sewer Main-Dewolf to McCall 92000 72141	Install Sewer main in Shaw (Phase I) In design, not bid yet		395,600
Pump Station E Pump Addition 92000 72597	Add a pump at pump station E In design, not bid yet		378,000
Shepherd/Willow Pump Station 92000 73205	Design location of Shepherd/Willow Pump Station In preliminary design only		50,000
Shaw Avenue Recycled Water Main 92000 73376	Install Recycled water main in Shaw (Phase II) In design, not bid yet		131,700

Department/Account Number	Description and Explanation	Bid Status	Amount
<b>Sewer Capital Projects - Developer Fund - Continued</b>			
Nees Sewer Main-Minnewawa/Clovis 92000 73377	Install Sewer main in Nees Avenue In design, not bid yet		300,000
<b>Park Improvements</b>			
SR168/Enterprise Canal Bridge 93000 74980	Pedestrian Bridge over SR168/ Enterprise Canal In design only		790,800
Misc Developer Park Projects 93000 75015	Reimburse developer park construction In progress		518,500
Loma Vista Village Green 93000 75635	Construct Village Green Park in Loma Vista In construction		7,631,000
<b>Street Improvements</b>			
Clovis Avenue Streetscape 95000 71461	Hardscape Improvements on Clovis Avenue In construction		243,800
Plan Lines 95000 74007	Create Plan lines for area North of Shepherd In design only		40,000
Lane Reduction study 95000 74019	Various lane reduction surveys In design only		29,000
Preventive Maintenance 95000 74020	Slurry seal on local streets In construction - Measure C funded		30,000
Shaw - DeWolf to McCall 95000 74057	Street widening and signals In design, not bid yet - Regional Measure C funded		7,378,200
Minnewawa - Alluvial to Herndon 95000 74059	Street Widening In design - Regional Surface Transportation Program funded		556,900
Gettysburg/Norwich Alley 95000 74101	Alley rehabilitation In design, not bid yet - Community Development Block Grant funded		199,500
Villa - Barstow to Shaw 95000 74132	Street rehabilitation In construction/Surface Transportation Block Grant funded		912,000
Bullard - Minnewawa to DeWitt 95000 74151	Rule 20 In design only		13,000
Herndon - Temperance to DeWolf 95000 74184	Street widening & signals In design - Regional Measure C funded		6,255,500
Miscellaneous Concrete Repairs 95000 74210	Miscellaneous improvements at various locations In progress		388,000
Miscellaneous Construction Repairs 95000 74215	Miscellaneous improvements at various locations In progress		199,000



Department/Account Number	Description and Explanation	Bid Status	Amount
<b>Street Improvements - Continued</b>			
Nees - Minnewawa to Clovis 95000 74508	Street Widening In design - Regional Service Transportation Program funded		1,770,700
Trail Pavement Maintenance 95000 74561	Maintenance on areas of the trail system In design, not bid yet		250,000
Local Street ADA ramps 95000 74567	America Disability Act improvements-City ramps In design, not bid yet		200,000
Ashlan - West of Leonard 95000 74568	Street Widening In design, no bid necessary		321,000
Shepherd/Peach Intersection 95000 74584	Install traffic signal at the intersection In design - Congestion Mitigation and Air Quality funded		63,000
Nees/Armstrong Intersection 95000 74585	Install traffic signal at the intersection In design - Congestion Mitigation and Air Quality funded		43,000
Alleys - SW of Pollasky/Mitchell 95000 74586	Alley rehabilitation In design/Community Development Block Grant funded		757,200
Horizontal Control System 95000 74587	Survey city horizontal control system In design only		20,000
Shepherd Signal Interconnect 95000 74595	Signal Interconnect In design - Congestion Mitigation and Air Quality funded		128,900
Armstrong - Alluvial to Nees 95000 74691	Street rehabilitation In design - Measure C funded		64,600
Shaw - Armstrong to Temperance 95000 74844	Street rehabilitation In construction/Surface Transportation Block Grant funded		24,000
Sunnyside Widening - Third to Fifth 95000 74966	Street Widening In design - Measure C funded		64,000
Ped Push Button Upgrade 95000 74972	ADA improvements at various City intersections In construction - Highway Safety Improvement funded		31,500
Vehicle Video Detection Replacement 95000 74973	Traffic Signal Improvements at various locations In construction - Measure C funded		940,500
Pavement Management System 95000 74975	Development of the pavement management system Coordinate with other projects		38,000
Bullard - Armstrong to Temperance 95000 74979	Street rehabilitation In construction/Surface Transportation Block Grant funded		770,600

Department/Account Number	Description and Explanation	Bid Status	Amount
<b>Street Improvements - Continued</b>			
Armstrong - Tollhouse to Sierra 95000 74981	Street rehabilitation In construction/Surface Transportation Block Grant funded		913,000
Barstow - Villa to Minnewawa 95000 74991	Street rehabilitation In design - Senate Bill 1 funded		43,000
Sierra - Willow to Peach 95000 74993	Traffic Signal Improvements at various locations In design - Measure C funded		16,000
Sunnyside - Fifth to Barstow 95000 74994	Traffic Signal Improvements at various locations In design - Measure C funded		14,000
Local Street Improvements 95000 74995	Slurry seal local streets In progress - Measure C funded		500,000
Villa - Barstow to Bullard 95000 74998	Street rehabilitation In construction/Surface Transportation Block Grant funded		966,000
Barstow - Minnewawa to Clovis 95000 74999	Street rehabilitation In construction/Surface Transportation Block Grant funded		71,000
<b>Water Capital Projects - Enterprise Fund</b>			
79 N. Sunnyside Tenant Improvement 96000 72631	Tenant Improvements at new Public Utilities building In construction		86,000
Recharge Facility 96000 77501	Locate a recharge site Limited staff availability		50,000
Aquifer Storage Recovery 96000 77502	Recharge alternative Limited staff availability		50,000
SWTP - High Service Pumps VFD 96000 77503	Add pumps at Surface Water Treatment Plant Limited staff availability		1,374,000
Santa Ana/Clovis Water Main 96000 77504	Modify water mains in the intersection Limited staff availability		240,000
SWTP Pretreatment 96000 77528	Pretreatment Process Limited staff availability		1,465,000
SWTP Process Addition 96000 77531	Addition to the treatment process Limited staff availability		30,000
Well 18 GAC 96000 77573	Granuar Activated Carbon at well 18 Limited staff availability		609,000
Well 35 96000 77600	Drill and Develop well site In construction		654,000
<b>Water Capital Projects - Developer</b>			
SWTP Expansion 97000 77529	Increase capacity of the plant Limited staff availability		200,000

Department/Account Number	Description and Explanation	Bid Status	Amount
<b>Water Capital Projects - Developer - Continued</b>			
SWTP Process Addition 97000 77531	Addition to the treatment process Limited staff availability		10,000
SWTP Storage Tank Addition 97000 77532	Additional tank/Surface Water Treatment Plant Limited staff availability		200,000
Northeast SWTP 97000 77536	Develop northeast Surface Water Treatment Plant Limited staff availability		100,000
Shaw Avenue Water Main 97000 77539	Install Water Main in Shaw Ave - DeWolf to McCall In design, not bid yet		328,100
Well 34 Aux Power 97000 77587	Generator at well Site 34 In design, no bid necessary		101,000
Water Development 97000 77725	Secure Water to serve areas w/in the General Plan In progress		300,000
Northern Water Intertie 97000 77750	Connection of Wtr Main to City of Fresno at Willow Limited staff availability		425,000
Water Storage Reservoir #9 97000 78045	Property Acquisition for Reservoir site in NW area In progress		2,342,000
Water Storage Reservoir #10 97000 78050	Property Acquisition for Reservoir site in NW area In progress		1,687,400
<b>Community Sanitation Improvements - Enterprise Fund</b>			
79 N. Sunnyside Tenant Improvement 99500 72631	Tenant Improvements at new Public Utilities building In construction		85,700
Landfill Entrance 99500 81125	Construct left turn lane into landfill entrance In construction		63,100
Landfill Electric Power 99500 81170	Extension of power to west end of property Limited staff availability		175,000
Solid Waste Facility Expansion 99500 81205	Acquire and construct a Refuse Satellite Facility Limited staff availability		771,000
Landfill Solar 99500 81211	Install Solar panels Limited staff availability		100,000
Landfill Flare 99500 81212	Upgrade Flare at the landfill Limited staff availability		35,000
Total Community Investment Program Department			<u>\$ 57,323,100</u>
Total Expenditure Reappropriations =			<u>\$ 68,152,100</u>



# CITY *of* CLOVIS

## REPORT TO THE CITY COUNCIL

TO: Mayor and City Council

FROM: General Services Department

DATE: October 17, 2022

SUBJECT: General Services – Approval - Claim Rejection of the General Liability Claim on behalf of Dianne Smith.

ATTACHMENTS: None

### **CONFLICT OF INTEREST**

None

### **RECOMMENDATION**

Reject the General Liability Claim filed on behalf of Dianne Smith.

### **EXECUTIVE SUMMARY**

On behalf of Dianne Smith (claimant), a General Liability Claim against the City of Clovis was filed on September 6, 2022, regarding a sidewalk causing a dangerous condition resulting in a trip and fall. Ms. Smith claims that she sustained bodily injuries and seeks reimbursement for medical expenses, loss of income, and future income. It is recommended that the claim be rejected at this time.

### **BACKGROUND**

On September 6, 2022, a General Liability Claim was filed against the City of Clovis on behalf of Ms. Dianne Smith. The claim was legally sufficient and timely. On March 17, 2022, Ms. Smith alleges the City failed to adequately maintain the sidewalk located near 1532 North Sanders Avenue, Clovis, which created a dangerous and/hazardous condition. Ms. Smith sustained injuries to her pelvis, hip, back, and right knee.

Ms. Smith's seeks damages for her medical expenses in an amount in excess of \$25,000. The claim has been filed as a "civil unlimited case".

### **FISCAL IMPACT**

Rejection of the claim does not result in any fiscal impact.

**REASON FOR RECOMMENDATION**

It is recommended that the claim be rejected. The City is not liable for this claim. In addition, by rejecting this claim, the time in which lawsuits may be filed against the City will begin to run.

**ACTIONS FOLLOWING APPROVAL**

A letter will be sent to the claimant informing Ms. Smith that the claim has been rejected.

Prepared by: Charles W. Johnson, Management Analyst

Reviewed by: City Manager *JH*



# CITY of CLOVIS

## REPORT TO THE CITY COUNCIL

TO: Mayor and City Council

FROM: General Services Department

DATE: October 17, 2022

SUBJECT: General Services – Approval - Res. 22-\_\_\_\_, Authorizing Amendments to the City’s Classification and Compensation Plans to Adopt both an Information Technology Cybersecurity Analyst and a Finance Business Systems Analyst Classification with a Salary Range of \$8,514 to \$10,349 per month for both positions; and Approval – Res. 22-\_\_\_\_, Amending the City’s FY 22-23 Position Allocation Plan.

ATTACHMENTS: 1. Resolution 22-\_\_\_\_ Classification and Compensation Plan  
2. Resolution 22-\_\_\_\_ Position Allocation Plan

### CONFLICT OF INTEREST

None.

### RECOMMENDATION

For City Council to approve a resolution authorizing amendments to the City’s Classification and Compensation Plans by adopting both an Information Technology Cybersecurity Analyst and a Finance Business Systems Analyst Classification with a Salary Range of \$8,514 to \$10,349 per month for both positions, and approve a resolution amending the City’s FY 22-23 Position Allocation Plan.

### EXECUTIVE SUMMARY

The City has a need to add both an Information Technology Cybersecurity Analyst and a Finance Business Systems Analyst classification. The proposed Information Technology Cybersecurity Analyst and the Finance Business Systems Analyst will be assigned to the City Manager Department. Over the last few years cyber security incidents have increased and caused several issues worldwide. There is a need to have an employee that will be dedicated to cybersecurity. The proposed Finance Business Systems Analyst will be responsible for performing the journey-level technical planning, implementation, and maintenance efforts related to the new financial enterprise software and utility billing systems. Adequate funds were included in the adopted FY22-23 budget for both new classifications. Modification of the City’s Classification, Compensation, and Position Allocation Plans require the City Council’s approval.

### BACKGROUND

During the FY 22-23 budget process, the City Manager Department determined the need to create an Information Technology Cybersecurity Analyst and a Finance Business Systems Analyst classification. These positions were added to the City Manager Department FY 22-23

Position Allocation Plan but now requires each classification in order to recruit for and fill both positions.

With the increase in cyber security incidents worldwide there have been numerous ransomware attacks on many local government agencies. Unfortunately, it is no longer a matter of “if” the City will be targeted or breached, it is now a matter of when that will happen. The proposed Information Technology Cybersecurity Analyst classification will be responsible for deploying technology throughout the City network to create a multi-layered defense. The incumbent will be responsible for proactively installing operating system updates and security patches on all enterprise equipment. This position will also educate and provide cyber security awareness to all City staff.

Staff is also proposing that the Finance Business Systems Analyst classification be added to reflect the new responsibilities and job duties that will be required in the City Manager Department. This classification will assist with the implementation of the new utility billing software and finance system. The incumbent will also perform lead responsibilities on an ongoing basis for assigned subsystems and the utility billing systems, including the annual project improvements, staff training, and system maintenance. The Finance Business Systems Analyst will work collaboratively with the Information Technology Division on software implementation and the ongoing testing, and system upgrades that the new software will require on a continuous basis.

The recommended salary range for both the Information Technology Cybersecurity Analyst and the Finance Business Systems Analyst will be \$8,514 to \$10,349. Both the Information Technology Cybersecurity Analyst and the Finance Business Systems Analyst will be assigned to the Confidential Technical and Financial Professionals Association (CTFP) bargaining unit for employee representation. The impact of each of these new classifications has been reviewed with the Confidential Technical and Financial Professionals Association unit representatives and they are in agreement with adding the new classifications.

### **FISCAL IMPACT**

During the budget process, placeholder positions of one Senior Information Technology Analyst and one Business Systems Analyst were in the 2022-23 budget. Those positions will be converted to the new positions with no additional impact to the FY 2022-23 City Manager Department budget allocation.


### **REASON FOR RECOMMENDATION**

Creation of each of these classifications is necessary in order to meet the needs within the City Manager Department. The recommended changes to the City’s Classification, Compensation, and Position Allocation Plans require Council approval.

### **ACTIONS FOLLOWING APPROVAL**

Personnel staff will add the new classification descriptions to the City’s Classification and Compensation Plans. The position allocation in the City Manager Department will be modified as noted in Attachment A of Attachment 2.

Prepared by: Lori Shively, Personnel/Risk Manager

Reviewed by: City Manager 

**RESOLUTION 22-  
RESOLUTION OF THE CITY COUNCIL OF THE CITY OF CLOVIS APPROVING  
AMENDMENTS TO THE CITY’S CLASSIFICATION AND COMPENSATION PLANS BY  
ADOPTING THE INFORMATION TECHNOLOGY CYBERSECURITY ANALYST AND  
ADOPTING THE FINANCE BUSINESS SYSTEMS ANALYST CLASSIFICATIONS IN THE  
CITY MANAGER DEPARTMENT**

**WHEREAS**, it has been determined that the City has a need for an Information Technology Cybersecurity Analyst classification to provide the necessary support to assist with City cyber security; and

**WHEREAS**, it has been determined that the City has a need for a Finance Business Systems Analyst classification to assist with the implementation of the new financial enterprise software and utility billing systems; and

**WHEREAS**, it has been determined that it is appropriate to assign both the Information Technology Cybersecurity Analyst and Finance Business Systems Analyst classifications to the Clovis Confidential Technical and Financial Professionals (CTFP) for representation.

**NOW, THEREFORE, BE IT RESOLVED**, that the City of Clovis shall modify the City’s Classification and Compensation Plans to include the Information Technology Cybersecurity Analyst (Attachment A) and the Finance Business Systems Analyst classifications (Attachment B) with a monthly salary range of \$8,514 to \$10,349.

\* \* \* \* \*

The foregoing resolution was introduced and adopted at a regular meeting of the City Council of the City of Clovis held on October 17, 2022, by the following vote, to wit.

AYES:  
NOES:  
ABSENT:  
ABSTAIN:

DATED: October 17, 2022

\_\_\_\_\_  
Mayor

\_\_\_\_\_  
City Clerk



**INFORMATION TECHNOLOGY CYBERSECURITY ANALYST**  
**\$8,514 to \$10,349 Monthly Salary**

**DEFINITION**

Under general supervision perform a variety of professional level work including the design, implementation, maintenance, evaluation, and daily management of security systems and solutions; and perform duties related to threat detection and prevention, education, risk assessment, compliance, governance, business recovery, forensics, incident response and perform related duties as required.

**CLASS CHARACTERISTICS**

Reporting to the Deputy Director of Technology, the Information Technology Cybersecurity Analyst maintains and administers the operational and technical aspects of the City's security information event and vulnerability management systems. This advanced level classification conducts risk assessments, evaluates security vulnerabilities, and monitors and analyzes City systems to identify priority mitigations. The incumbent provides assistance and training to City staff to correct identified security vulnerabilities and implement priority security protocols; assists in developing programs to ensure City compliance with regulatory, security, and privacy standards adopted by the City. Instructions given by the supervisor generally do not provide all of the information needed to complete an assignment. Incumbents are expected to resolve most problems confronted through the application of industry best practices, technical knowledge, judgment, and precedent; referring to the supervisor only those problems which involve the establishment of new procedures or which involve solutions which are inconsistent with departmental procedures and policies. The incumbent has some independence in selecting work methods or procedures.

**EXAMPLE OF DUTIES**

Implement, monitor, maintain, and troubleshoot various security systems that protect the City's networks, systems, applications and critical infrastructure. Implement timely solutions to security issues adversely affecting confidentiality, integrity and/or availability of City systems and data. Analyze security alerts and event data to identify potential security incidents, threats, mitigations, and vulnerabilities. Facilitate cyber security training and security awareness programs. Perform risk assessments and execute tests of network and information systems to ensure technology processes are secure; stay up to date on evolving security threats and trends; regularly review security alerts and reports from Federal, State and commercial security sources. Establish protocols to protect digital files and information systems against unauthorized access, modification, and/or destruction. Plan and conduct internal and external cyber security audits, interpret and document audit results and recommend corrective actions. Incumbents in this class may provide lead direction to other team members but do not possess supervisory responsibilities. Perform related work as required.

## **TYPICAL QUALIFICATIONS LICENSE REQUIRED**

- Possession of a valid and appropriate California Driver's License and a good driving record.

## **EDUCATION AND EXPERIENCE**

Education:

- Bachelor's Degree from an accredited college or university with major course work in Information Security, Computer Science, Information Technology, Business Administration, or a closely related field.

AND

Experience:

- Four (4) years of progressively responsible information technology experience, preferably in Information Security, including vulnerability management, SIEM administration, and/or incident response responsibilities.

Certifications Desirable:

- CISSP
- GSEC
- Security+
- CISM

## **QUALIFICATIONS**

Knowledge of:

- NIST 800-series cyber security standards, CIS Top-20 Critical Security Controls, Payment Card Industry Data Security Standards (PCI-DSS), and Criminal Justice Information Security (CJIS) requirements;
- Principles and practices of securing cloud-hosted systems and applications;
- Principles and practices of complex operating system design, analysis, and documentation;
- Current hacker techniques, exploits, active defense detection and prevention measures, penetration testing tools, tactics, techniques, and procedures;
- Information security frameworks, incident response and management, application security best practices and operations;
- Unified threat management (UTM) firewalls and associated components including, but not limited to, URL/Content filtering, file scanning and blocking, and data leakage prevention;
- SSL Certificates and Encryption Key Lifecycle Management;
- Endpoint detection and response (EDR) platform deployment, monitoring and management;
- Business continuity planning, documentation, and testing best practices;
- Computer and network forensic tools, techniques and analysis including root cause and comprehensive cause and effect analysis of cyber attacks and breaches;

- One or more scripting languages, e.g. PowerShell, Python, BASH, etc.

Ability to:

- Analyze data communications, networks, hardware and software problems and determine feasible solutions;
- Manage security-related projects, investigations, operations and incident response;
- Identify and document observed risks, threats and vulnerabilities and propose practical steps to minimize or mitigate them.
- Perform and/or work with service providers to conduct risk assessments ethical hacking/penetration testing against city systems
- Conduct cyber-security awareness training, campaigns, and testing
- Communicate effectively orally and in writing;
- Develop and implement operational policies and procedures;
- Establish and maintain effective working relationships with co-workers, representatives of user departments, outside agencies, and the public;
- Maintain the confidentiality of privileged information;
- Operate a vehicle observing legal and defensive driving practices;
- Prepare clear, accurate, and concise reports and records.

## **SUPPLEMENTAL INFORMATION**

### **PHYSICAL DEMANDS AND WORKING CONDITIONS**

- Strength: Light work-lifting, caring and/pushing 25 pounds maximum with frequent lifting and/or carrying of objects weighing up to 25 pounds;
- Positions in this class may be designated as confidential under Meyers-Millas Brown Act.

**FINANCE BUSINESS SYSTEMS ANALYST**  
**\$8,514 to \$10,349 Monthly Salary**

**DEFINITION**

Under general supervision provide a wide range of professional and technical support services in implementing, integrating, troubleshooting, and maintaining the City's financial enterprise and utility billing software systems and perform related duties as required.

**CLASS CHARACTERISTICS**

This single position journey-level class will provide a wide range of advanced professional and technical support services related to the City's financial and utility billing systems and related workflows. The position partners with the Information Technology Division (IT) and key staff from other City Departments for planning, implementation, and maintenance efforts related to the financial enterprise software and utility billing systems. Instructions given by the supervisor generally do not provide all of the information needed to complete an assignment. The incumbent is expected to resolve most problems confronted through the application of technical knowledge, judgment, and precedent, referring to the supervisor only those problems which involve the establishment of new procedures, or which involve solutions which are inconsistent with departmental procedures and policies. The incumbent has some independence in selecting work methods or procedures.

**EXAMPLES OF DUTIES**

Serve as business lead and subject matter expert in department business processes for the implementation of new or revised financial enterprise software and utility billing systems, along with their related processes and procedures. Support and/or develop financial reports while also assisting in analyzing financial reporting requirements. Identify and design process improvements in relationship to financial systems, as well as related workflow processes and approvals. Provide project leadership, configuration management, testing, and support for assigned financial subsystems. Develop implementation, maintenance, and communication plans. Draft or revise related policies and procedures. Perform lead responsibilities on an on-going basis for assigned financial subsystems and utility billing systems, including annual project improvements and maintenance. Train existing and new staff from all City departments on financial systems.

Provide configuration management for financial and utility billing systems. Provide support for configuration changes, workflow changes, and other system process modifications. Participate in change management control of financial and utility billing systems. Work with IT Division to control access to financial systems data. Provide support of financial and utility billing systems through the IT Services Help Desk. Develop, plan, and lead staff on the testing and implementation of system upgrades and modifications. Work with the Information Technology staff and system vendors to identify and implement upgrades. Assure modifications and upgrades are successfully tested before implementation to the live environment. Report systems issues to the systems vendors and work with vendors to resolve the issues. Document

**ATTACHMENT B**

processes and results. Utilize standard reporting tools to write, maintain and support a variety of reports or queries. Help maintain data integrity in systems by running queries and analyzing data. Develop standard reports for ongoing customer needs and ad hoc queries as needed, working with staff to identify information requirements. Work with Information Technology staff to resolve complex reporting issues. Perform related work as required.

## **TYPICAL QUALIFICATIONS**

### **LICENSE REQUIRED**

- Possession of a valid and appropriate California Driver's License and a good driving record.

### **EDUCATION AND EXPERIENCE**

Education:

- Bachelor's Degree from an accredited college or university with major course work in in accounting, finance, information technology, or business administration, or a closely related field.

AND

Experience:

- Four (4) years of progressively responsible experience in accounting systems support including implementation, maintenance, configuration, or utilization in an enterprise environment, preferably in a municipal environment.

### **QUALIFICATIONS**

Knowledge of:

- Complex systems project management including planning, scheduling, monitoring and problem solving;
- Governmental accounting and auditing practices and principles;
- Municipal finance policies, procedures, and operating guidelines;
- Operation and configuration of financial software and utility billing systems in a municipal setting;
- Relevant city, county, state and federal laws and regulations;
- Research methods, data collection and sampling techniques, and statistical analysis.

Ability to:

- Test and configure complex financial systems consistent with business needs of the City;
- Understand and interpret financial and utility billing systems requirements from both a business and a technical perspective;
- Communicate business issues and goals with employees at all levels of the organization;
- Configure, change, and test financial and utility billing software and related systems based on business needs of the City;
- Recommend business configurations based on knowledge of financial and utility billing systems and City goals;

- Understand and interpret workflow processes within a complex organization;
- Diagnose and resolve systems analysis problems, evaluate alternatives and make sound independent decisions within established guidelines;
- Utilize a variety of spreadsheets, analytical tools, and other computer software for testing analysis and preparation of reports for management as requested;
- Collect, compile, and analyze complex information and data;
- Prepare, write, and present clear, accurate, and concise analytical reports and systems analysis to diverse groups;
- Work independently with minimal direction;
- Communicate effectively orally and in writing;
- Develop and implement operational policies and procedures;
- Establish and maintain effective working relationships with co-workers, representatives of user departments, outside agencies, and the public;
- Maintain the confidentiality of privileged information;
- Operate a vehicle observing legal and defensive driving practices.

#### **SUPPLEMENTAL INFORMATION**

#### **PHYSICAL DEMANDS AND WORKING CONDITIONS**

- Strength: Light work-lifting, caring and/pushing 25 pounds maximum with frequent lifting and/or carrying of objects weighing up to 25 pounds;
- Positions in this class may be designated as confidential under Meyers-Millas Brown Act.

**RESOLUTION 22-**

**RESOLUTION OF THE CITY COUNCIL OF THE  
CITY OF CLOVIS APPROVING AMENDMENTS TO THE  
CITY'S FY 22-23 POSITION ALLOCATION PLAN**

**WHEREAS**, the FY 22-23 Position Allocation Plan in the City Manager Department that was approved as part of the FY 22-23 City budget adoption process included placeholder positions for ne Senior Information Technology Analyst, and one Business Systems Analyst position; and

**WHEREAS**, a review of the staffing needs of the City indicates that converting one Senior Information Technology Analyst to one newly created classification of Information Technology Cybersecurity Analyst is necessary in order to provide the needed capacity to cover cyber security threats within the City; and

**WHEREAS**, a review of the staffing needs of the City indicates that converting one Business Systems Analyst to one newly created classification of Finance Business Systems Analyst is necessary to provide support for the planning, implementation, and maintenance efforts related to the new financial enterprise software and utility billing systems; and

**WHEREAS**, amending the City's adopted FY 22-23 Position Allocation Plan requires City Council authorization.

**NOW THEREFORE, BE IT RESOLVED** by the City Council of the City of Clovis that the City's FY 22-23 Position Allocation Plan shall be amended as noted in Attachment A.

\* \* \* \* \*

The foregoing Resolution was introduced and adopted at a regular meeting of the City Council of the City of Clovis held on October 17, 2022, by the following vote to wit:

- AYES:
- NOES:
- ABSENT:
- ABSTAIN:

DATED: October 17, 2022

\_\_\_\_\_  
Mayor

\_\_\_\_\_  
City Clerk

**POSITION ALLOCATION ADJUSTMENT BY DEPARTMENT FY 22-23**

DEPARTMENT	NUMBER OF POSITIONS
<b>City Manager Department</b>	
Add:	Information Technology Cybersecurity Analyst 1.0
Delete:	Senior Information Technology Analyst 1.0
Add:	Finance Business Systems Analyst 1.0
Delete:	Business Systems Analyst 1.0





# CITY *of* CLOVIS

## REPORT TO THE CITY COUNCIL

TO: Mayor and City Council

FROM: General Services Department

DATE: October 17, 2022

SUBJECT: General Services – Approval – Res. 22-\_\_\_\_, Authorizing Amendments to the City’s Classification and Compensation Plans to Adopt the Principal Utilities Engineer Classification with a Salary Range of \$11,795 to \$14,337 per month, and Approval – Res. 22-\_\_\_\_, Amending the City’s FY 22-23 Position Allocation Plan.

ATTACHMENTS: 1. Resolution 22-\_\_\_\_ Classification and Compensation Plan  
2. Resolution 22-\_\_\_\_ Position Allocation plan

### CONFLICT OF INTEREST

None

### RECOMMENDATION

For City Council to approve a resolution authorizing amendments to the City’s Classification and Compensation Plans by adopting the Principal Utilities Engineer Classification with a Salary Range of \$11,795 to \$14,337 per month, and approve a resolution amending the City’s FY 22-23 Position Allocation Plan.

### EXECUTIVE SUMMARY

The Public Utilities Department has a need to add a Principal Utilities Engineer classification. The proposed classification will be responsible for performing managerial level work associated with City public utilities projects, construction inspection, and long-range planning. Following the evaluation of work assignments within the Public Utilities Department, a Principal Utilities Engineer position is requested to be added to the City’s Classification and Compensation Plans and the FY 22-23 budget so recruitment for the position may occur. Modification of the City’s Classification and Compensation Plans requires the City Council’s approval.

### BACKGROUND

The Public Utilities Department has determined the need to create a Principal Utilities Engineer classification. Staff is requesting that one (1) Principal Utilities Engineer position be added to the Public Utilities Department FY 22-23 Position Allocation Plan in order to recruit for and fill the position.

Staff is proposing that the Principal Utilities Engineer classification be added to reflect the responsibilities and job duties that are required in the Public Utilities Department. This position will report to the Public Utilities Director. The incumbent will be responsible for performing the most complex professional engineering work, supervising personnel, and directing technical operations for the Public Utilities Department.

It is recommended that the salary range for the Principal Utilities Engineer be placed between the City Engineer and Supervising Civil Engineer management positions as this position will have a high level of responsibility as the primary Engineer for the Public Utilities Department. The recommended new salary range would be \$11,795 to \$14,337 per month. The Principal Utilities Engineer will be assigned to the management group. The new classification and salary range reflect the current needs of the City.

### **FISCAL IMPACT**

The salary and related benefit costs of this proposed classification for the remainder of the fiscal year would be approximately an additional \$122,000. The additional costs can be absorbed in the FY 22-23 Public Utilities Department budget as the Public Utilities Department has salary savings from current unfilled positions.


### **REASON FOR RECOMMENDATION**

Creation and addition of the Principal Utilities Engineer classification to the City's classification and compensation plans provides a detailed classification description and allows for the recruitment of the new position. Modification of the City's classification and compensation plans requires City Council approval.

### **ACTIONS FOLLOWING APPROVAL**

Personnel staff will update the City's classification and compensation plans with the addition of the Principal Utilities Engineer.

Prepared by: Lori Shively, Personnel/Risk Manager

Reviewed by: City Manager 

**RESOLUTION 22-\_\_\_\_**

**A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF CLOVIS APPROVING AMENDMENTS TO THE CITY'S CLASSIFICATION AND COMPENSATION PLANS BY ADOPTING A PRINCIPAL UTILITIES ENGINEER CLASSIFICATION IN THE PUBLIC UTILITIES DEPARTMENT**

**WHEREAS**, it has been determined that the City has a need for a Principal Utilities Engineer classification to provide the necessary support to the Public Utilities Department; and

**WHEREAS**, it has been determined that the appropriate salary range for the Principal Utilities Engineer classification is \$11,795 to \$14,337 per month; and

**WHEREAS**, it has been determined that it is appropriate to assign the Principal Utilities Engineer classification to the Management Group.

**NOW THEREFORE, BE IT RESOLVED**, that the City of Clovis will modify the City's Classification and Compensation Plans to include the Principal Utilities Engineer classification (Attachment A) with a monthly salary range of \$11,795 to \$14,337.

\* \* \* \* \*

The foregoing Resolution was introduced and adopted at a regular meeting of the City Council of the City of Clovis held on October 17, 2022, by the following vote to wit:

AYES:

NOES:

ABSENT:

ABSTAIN:

Dated: October 17, 2022

\_\_\_\_\_  
Mayor

\_\_\_\_\_  
City Clerk

**CITY OF CLOVIS****PRINCIPAL UTILITIES ENGINEER**  
**Monthly Salary: \$11,795 to \$14,337****DEFINITION**

Under general direction, plan, organize and direct the work of assigned operations of the Public Utilities Department; advise the Public Utilities Director, Assistant Public Utilities Directors, City Engineer and the Director of Planning and Development Services regarding maintenance, operations, engineering, construction inspection, and City public utilities projects and activities; perform the most complex professional engineering work of the Public Utilities Department and perform related work as required.

**CLASS CHARACTERISTICS**

Reporting to the Public Utilities Director, the Principal Utilities Engineer is a managerial level class in the Public Utilities Department. The incumbent is responsible to the Public Utilities Director and coordinates with the City Engineer for advice and consultation on engineering matters and for the efficient operation of a division comprised of operations and maintenance, technical services, administration, City public utilities projects, construction inspection, and long-range planning. The Principal Utilities Engineer receives authority from the Public Utilities Director and functions as the engineer of record for Public Utilities. The Principal Utilities Engineer exercises supervision over other managerial employees and personnel making assignments, setting priorities, training, and reviewing work. The incumbent is responsible for preparing performance evaluations, processing employee grievances, recommending employment, and for taking and recommending disciplinary action. Positions in this class act with a high degree of independence of action in the assigned area of responsibility. Direction received consists of the assignment of the responsibility to attain objectives according to policy guidelines, department, and city objectives. Incumbents are expected to develop methods and procedures and solve problems encountered. Except where a deviation in policy is involved, most work is not reviewed directly by a supervisor, and when work is reviewed, the review is directed toward final outcomes and results.

**EXAMPLES OF DUTIES**

Plan, organize, and control activities in the Public Utilities Department as assigned by the Public Utilities Director and coordinate engineering matters with the City Engineer; supervise assignments of managers in the utilities and maintenance sections; participate in evaluating the need for and help develop plans and schedules for long-range public works and utilities programs; compile estimates, contract provisions and specifications; negotiate agreements with consultants, engineers, property owners, contractors, and other agencies for project and program delivery, rights-of-way, easements and financial participation; confer with Division and Department staff, other departments, and various public groups on maintenance operations, projects and improvements; confer with subordinates on the construction or rehabilitation of new and existing public works facilities; confer and negotiate with consultants and private engineering firms; provide direction on problems of design, materials and processes proposed in connection with new construction or major repairs; prepare ordinances for Council consideration; participate in the selection of new employees;

**ATTACHMENT A**

recommend and approve improvement plans for City public utilities projects; inspect and approve City public utility and maintenance improvements on behalf of the Public Utilities Department; may participate in traffic studies and recommend improvement of traffic control devices; represent the City in relations with other governmental agencies; conduct and assign field inspections; participate in the development and administration of the Division budget, and the Public Utilities Department budget; prepare and conduct performance evaluations; explain policies, procedures and objectives of the division to staff by written directive and by oral communications; conduct staff and public information meetings; and perform related work as required.

### **TYPICAL QUALIFICATIONS**

#### **LICENSE REQUIRED**

- Possession of a valid appropriate California Driver's License and a good driving record.
- Possession of current and valid Civil Engineer license from the State of California Department of Consumer Affairs Board for Professional Engineers, Land Surveyors, and Geologists.

#### **EDUCATION AND EXPERIENCE**

Education:

- Graduation from an accredited college or university with a Bachelor's Degree in Civil Engineering or a closely related field. A master's degree is desirable.

And

Experience:

- A minimum of five (5) years of increasingly responsible professional civil engineering and administrative experience, with at least two (2) years in a supervisory or administrative capacity in municipal or county government.

#### **QUALIFICATIONS**

Knowledge of:

- Technical, legal, financial and public relations problems involved in the conduct of municipal engineering programs;
- Methods of preparing designs, plans, specifications, estimates, reports and recommendations relating to proposed municipal and public works facilities;
- Federal, state and local laws and regulations relating to municipal works and engineering;
- Principles of supervision and training;
- Principles of budgeting and financial management;
- Engineering principles and practices as applied to the field of municipal government;
- Knowledge of traffic engineering;
- Appropriate safety precautions and procedures.

Ability to:

- Prepare comprehensive and complex technical reports;
- Establish and maintain effective working relationships with subordinates, public groups and organizations, City officials and private and governmental agencies;
- Understand pertinent procedures and functions quickly;
- Read, understand and apply highly complex materials;
- Formulate and administer the division and Capital Improvement Projects (CIP) budget;
- Establish and maintain effective relationships with those contacted in the course of work.  
Help formulate and carry out City and department policy

#### **SUPPLEMENTAL INFORMATION**

#### **PHYSICAL DEMANDS AND WORKING CONDITIONS**

- Incumbent is required to attend periodic evening meetings.
- Incumbent is required to travel within and out of the City to attend meetings.
- Positions in this classification are designated as confidential under the Meyers-Millais Brown Act and are exempt employees under the Fair Labor Standards Act.
- The work is primarily sedentary.

**RESOLUTION 22-\_\_**

**A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF CLOVIS  
APPROVING AMENDMENTS TO THE CITY'S FY 22-23 POSITION  
ALLOCATION PLAN**

**WHEREAS**, the FY 22-23 Position Allocation Plan in the Public Utilities Department was approved as part of the FY 22-23 City Budget adoption process; and

**WHEREAS**, a review of the staffing needs for the Public Utilities Department indicates that the addition of one (1) Principal Utilities Engineer position is necessary in order to provide the support necessary for the Public Utilities Department; and

**WHEREAS**, amending the City's adopted FY 22-23 Position Allocation Plan requires City Council authorization.

**NOW, THEREFORE, BE IT RESOLVED, RESOLVED** by the City Council of the City of Clovis that the City's FY 22-23 Position Allocation Plan shall be amended as noted in Attachment A.

\* \* \* \* \*

The foregoing resolution was introduced and adopted at a regular meeting of the City Council of the City of Clovis held on October 17, 2022, by the following vote, to wit.

- AYES:
- NOES:
- ABSENT:
- ABSTAIN:
  
- DATED:

\_\_\_\_\_  
Mayor

\_\_\_\_\_  
City Clerk

**ATTACHMENT 2**

**POSITION ALLOCATION ADJUSTMENT BY DEPARTMENT FY 22-23**

<b>DEPARTMENT</b>	<b>NUMBER OF POSITIONS</b>
Public Utilities Department	
Add: Principal Utilities Engineer	1.0

**ATTACHMENT A**





# CITY *of* CLOVIS

## REPORT TO THE CITY COUNCIL

TO: Mayor and City Council

FROM: Planning and Development Services Department

DATE: October 17, 2022

SUBJECT: Planning and Development Services – Approval – Bid Award for CIP 17-13 Nees Avenue Street Widening and Authorize the City Manager to Execute the Contract on behalf of the City.

ATTACHMENTS: 1. Vicinity Map

### **CONFLICT OF INTEREST**

None.

### **RECOMMENDATION**

1. For the City Council to award a contract for CIP 17-13, Nees Avenue Street Widening to Agee Construction Corporation in the amount of \$2,854,012.00; and
2. For the City Council to authorize the City Manager to execute the contract on behalf of the City.

### **EXECUTIVE SUMMARY**

Staff is recommending that City Council authorize the City Manager to award and execute the contract to Agee Construction Corporation who was the lowest responsible bidder from a bid opening that took place on October 4, 2022.

This project consists of widening westbound Nees Avenue from Minnewawa to Clovis Avenue. The work includes the installation of sewer, potable water, storm drain, Fresno Irrigation utilities, new streetlights, pavement reconstruction, and concrete improvements. In addition, the construction work includes modifications to the existing traffic signal and the installation of new traffic loops and pavement markings, and signs.

**BACKGROUND**

The following is a summary of the bid results of October 4, 2022:

<u>BIDDERS</u>	<u>BASE BIDS</u>
Agee Construction Corporation	\$2,854,012.00
Avison Construction, Inc.	\$2,918,506.00
Emmett Valley Construction	\$2,971,501.00
Emmett's Excavation, Inc.	\$2,977,045.00
American Paving Co.	\$3,143,018.00
Dawson-Mauldin, LLC	\$3,151,701.00
<b>ENGINEER'S ESTIMATE</b>	<b>\$2,715,221.50</b>

All bids were examined, and the bidder's submittals were found to be in order with Agee Construction Corporation as the lowest responsible bidder. Staff has validated the lowest bidder's contractor license status and completeness of federal funding paperwork.

**FISCAL IMPACT**

This project is budgeted in the 2022-2023 Community Investment Program. The project is mainly funded by the Regional Surface Transportation Program (RSTP) through the City Community Investment Program. The sewer improvements are funded by the sewer developer funds and surface improvements directly related to the development on the north side of Nees are funded by that specific developer.

**REASON FOR RECOMMENDATION**

Agee Construction Corporation is the lowest responsible bidder. There are sufficient funds available for the anticipated cost of this project.

**ACTIONS FOLLOWING APPROVAL**

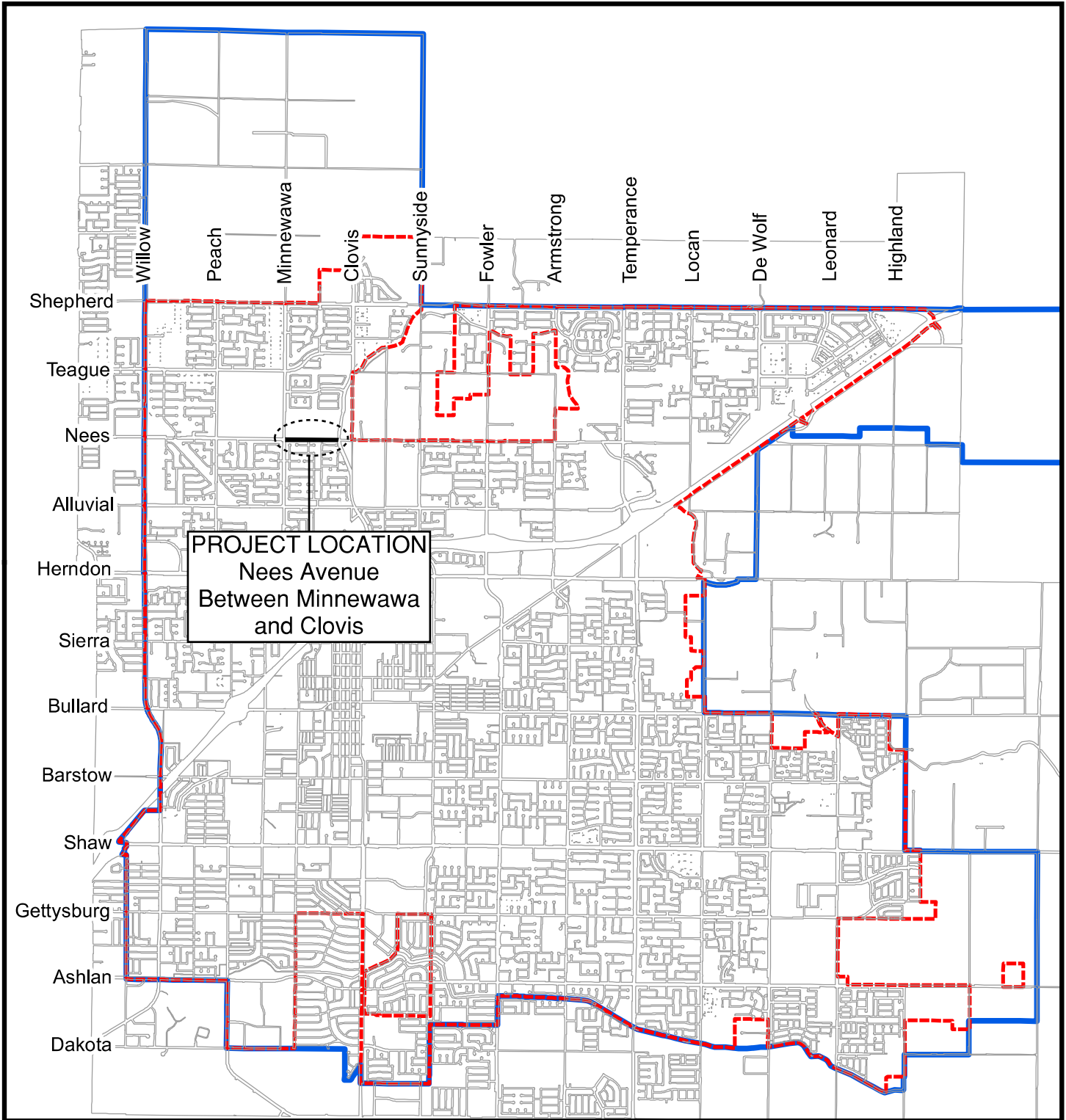
1. The contract will be prepared and executed, subject to the Contractor providing performance security that is satisfactory to the City.
2. Construction will begin approximately one (1) week after contract execution and be completed in twenty (85) working days thereafter. Construction start time shall be contingent upon completion of CIP 21-12- Nees Avenue Rule 20B.

Prepared by: Jorge Aguilera, Engineer II

Reviewed by: City Manager *JH*

# VICINITY MAP

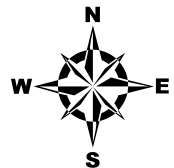
## CIP 17-13 Nees Avenue Street Widening



**PROJECT LOCATION**  
 Nees Avenue  
 Between Minnewawa  
 and Clovis



### Attachment 1





# CITY of CLOVIS

## REPORT TO THE CITY COUNCIL

TO: Mayor and City Council  
 FROM: Planning and Development Services Department  
 DATE: October 17, 2022  
 SUBJECT: Planning and Development Services - Approval – Final Acceptance for CIP 21-04, Loma Vista Village Green Offsite Improvements.  
 ATTACHMENTS: 1. Vicinity Map

**CONFLICT OF INTEREST**

None.

**RECOMMENDATION**

For the City Council to accept the work performed as complete and authorize recording of the notice of completion.

**EXECUTIVE SUMMARY**

The project consisted of clearing and grubbing, grading, placement of aggregate base, asphalt concrete pavement, construction of valley gutters, curb and gutters, installation of signage and striping, water mains, sewer mains and storm drain facilities on Loma Vista Parkway, Encino Avenue, Person Ranch Avenue, and Rialto Avenue west surrounding and encompassing the Loma Vista Village Green site.

**BACKGROUND**

Bids were received on September 7, 2021, and the project was awarded by City Council to the low bidder, Avison Construction Inc., on September 20, 2021. The project was completed in accordance with the construction documents and the contractor has submitted a request for acceptance of the project.

**FISCAL IMPACT**

1.	Award	\$1,321,088.00
2.	Cost increases/decreases resulting from differences between estimated quantities used for award and actual quantities installed.	\$22,820.87
3.	Contract Change Orders	\$189,827.96
<b>Final Contract Cost</b>		<b>\$1,533,736.83</b>

Most of the Contract Change Order Costs were contributed to the oversaturated soil conditions in the subgrade of the streets constructed. This condition was not apparent through the design geotechnical reports therefore was an unforeseen condition that did not allow for proper compaction of the road section. After engineering analyzed multiple options to remedy the condition, the most cost-effective way resulted in the contractor lime treating the soil in roadway sections to achieve firm subgrade.


#### **REASON FOR RECOMMENDATION**

The Public Utilities Department, the City Engineer, the engineering inspector, and the project engineer agree that the work performed by the contractor is in accordance with the project plans and specifications and has been deemed acceptable. The contractor, Avison Construction, Inc., has requested final acceptance from City Council.

#### **ACTIONS FOLLOWING APPROVAL**

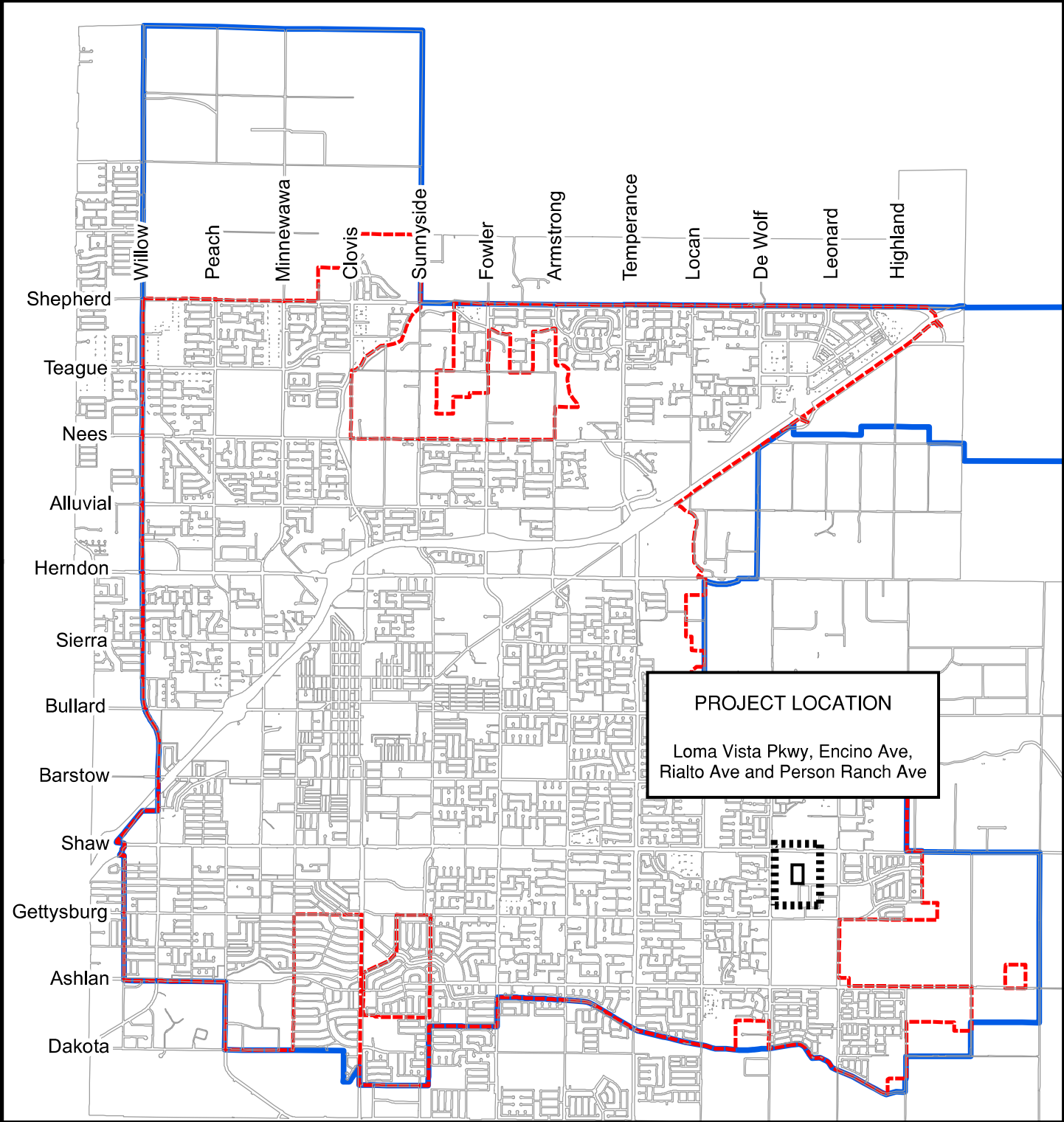
1. The notice of completion will be recorded; and
2. All remaining retention funds will be released no later than 35 calendar days following recordation of the notice of completion, provided no liens have been filed. Retention funds may be released within 60 days after the date of completion, provided no liens have been filed, with "completion" defined as the earlier of either (a) beneficial use and occupancy and cessation of labor, or (b) acceptance by the City Council per Public Contract Code Section 7107(c)(2).

Prepared by: Tatiana Partain, Management Analyst

Reviewed by: City Manager 

# VICINITY MAP

## CIP 21-04 Loma Vista Village Green Offsite Improvements



**PROJECT LOCATION**  
 Loma Vista Pkwy, Encino Ave,  
 Rialto Ave and Person Ranch Ave



# ATTACHMENT 1





# CITY of CLOVIS

## REPORT TO THE CITY COUNCIL

TO: Mayor and City Council  
 FROM: General Services Department  
 DATE: October 17, 2022  
 SUBJECT: Consider Various Actions Related to the Public Utilities Director Position:

a. Consider Introduction - Ord. 22-\_\_\_\_, An Ordinance of the City Council of the City of Clovis amending Article 5 Department of Public Utilities, Sections 2.2.501 and 2.2.502, and adding sections 2.2.503 and 2.2.504 of Chapter 2.2 (Officers and Employees) of the Clovis Municipal Code Pertaining to the Department of Public Utilities and the Position of Public Utilities Director, and

b. Consider Approval - Res. 22-\_\_\_\_, Authorizing Amendments to the Public Utilities Director Classification within the Public Utilities Department.

**Staff:** Lori Shively, Personnel/Risk Manager

**Recommendation:** Approve

ATTACHMENTS: 1. Draft Ordinance  
 2. Resolution 22-\_\_\_\_ Amendment to the Classification Plan

### CONFLICT OF INTEREST

None

### RECOMMENDATION

For the City Council to introduce an ordinance of the City of Clovis amending Article 5 Department of Public Utilities, Sections 2.2.501 and 2.2.502, and adding sections 2.2.503, and 2.2.504 of Chapter 2.2 (Officers and Employees) of the Clovis Municipal Code Pertaining to the Department of Public Utilities and the Position of Public Utilities Director; and approve a resolution authorizing amendments to the Public Utilities Director Classification.

### EXECUTIVE SUMMARY

The proposed ordinance revisions to the code more clearly define the Public Utilities Director role as the "Superintendent of Streets" and makes the code consistent with the Public Utilities Director job description requirement for possession of a current and valid Civil Engineer license

from the State of California Department of Consumer Affairs Board for Professional Engineers, Land Surveyors, and Geologists.

The ordinance revision also codifies the Public Utilities Director's authority to approve Public Utility Department maintenance and operation plans and specifications, and to inspect and approve City public utility and maintenance improvements prior to acceptance by the City. These are duties that are required of the Public Utilities Director and this ordinance more clearly defines the required job duties.

In combination with the ordinance, staff requests approval of a resolution updating the Public Utilities Director job classification. A copy of the revised job classification is attached as Attachment A of Attachment 2.

### **BACKGROUND**

The proposed ordinance revisions more clearly define the Public Utilities Director role as the Superintendent of Streets in conformance with State law and the Streets and Highways code and the need for the Public Utilities Director to possess a current and valid Civil Engineer license from the State of California Department of Consumer Affairs Board for Professional Engineers, Land Surveyors, and Geologists.

The Public Utilities Director and the City Engineer work together to deliver the necessary services for the City. In this coordinated approach, the City Engineer is generally responsible to approve plans and specifications for the City. However, in the day-to-day maintenance and operations of the City it is also necessary that the Public Utilities Director have plan and specification approval authority. The proposed ordinance codifies the Public Utilities Director existing authority to design, plan and approve plans and specifications for City public utility improvements with respect to maintenance and operations. It specifies that the Public Utilities Director has the authority to inspect and approve City public utility and maintenance projects prior to acceptance by the City. The above duties are in addition to duties and responsibilities, and authority that may be prescribed in the Municipal Code, State law, and the job classification.

Finally, staff recommends updating the Public Utilities Director classification specification to define the required job duties and reflect the responsibilities listed in the updated ordinance more accurately. Changes to the classification include some minor wording changes and typographical fixes, updating the name of the State of California Department of Consumer Affairs Board for Professional Engineers, Land Surveyors and Geologists, identifies that the Public Utilities Director may "approve plans on behalf of the City for construction of City public utility maintenance and operation improvements", and adds "inspect and approve City public utility and maintenance improvements". Modification of the City's Classification Plan requires the City Council's approval.

### **FISCAL IMPACT**

None.



**REASON FOR RECOMMENDATION**

If approved, the ordinance will more clearly define the duties that are performed by the Public Utilities Director and better defines the authority of the position. The job classification is also being updated to state the current job duties that the Public Utilities Director is performing.

**ACTIONS FOLLOWING APPROVAL**

This ordinance will return for a second reading on November 7, 2022, and if approved, go into effect 30 days thereafter. The City's Classification Plan will be updated to include the revised Public Utilities Director classification.

Prepared by: Lori Shively, Personnel/Risk Manager

Reviewed by: City Manager *JS*

## ORDINANCE NO. 22 - \_\_\_

**AN ORDINANCE OF THE CITY COUNCIL OF THE CITY OF CLOVIS AMENDING ARTICLE 5 DEPARTMENT OF PUBLIC UTILITIES, SECTIONS 2.2.501 AND 2.2.502, AND ADDING SECTIONS 2.2.503 AND 2.2.504 OF CHAPTER 2.2 (*Officers and Employees*) OF THE CLOVIS MUNICIPAL CODE PERTAINING TO THE DEPARTMENT OF PUBLIC UTILITIES AND THE POSITION OF PUBLIC UTILITIES DIRECTOR**

THE CITY COUNCIL OF THE CITY OF CLOVIS DOES ORDAIN AS FOLLOWS:

SECTION 1. Article 5, Sections 2.2.501 through 2.2.504 of Chapter 2.2, are hereby amended and added in the Clovis Municipal Code to read as follows:

**Chapter 2.2**

**OFFICERS AND EMPLOYEES**

**Article 5. Department of Public Utilities**

**2.2.501 Public Utilities Director.**

The Public Utilities Director shall be the head of the Public Utilities Department. The Public Utilities Director shall be a licensed civil engineer in the State of California and meet the additional minimum qualifications set forth in the most recent job classification approved by the City Council.

**2.2.502 ~~Director of Public Works~~ Public Utilities Director: Additional titles.**

Wherever in this Code or under any law or act of the State reference is made to the "Superintendent of Streets" or "Street Superintendent," such reference shall be construed as meaning the ~~Director of Public Works~~ Public Utilities Director, and he who shall exercise all the powers and duties of such "Superintendent of Streets" or "Street Superintendent."

**2.2.503 Duties, responsibilities, and authority of Public Utilities Director.**

In addition to the duties, responsibilities, and authority that may be prescribed in the Municipal Code, State law, and the most recent job classification approved by the City Council, the Public Utilities Director shall have authority for the following:

- (a) As defined in a mutually developed procedural guideline, coordinate with the City's Capital Improvement Program, that functions under the Planning Development Services Department, to design, plan, and approve plans, specifications and/or designs for the Department of Public Utilities maintenance and operation of City public utility improvements, and to direct the repair, maintenance and expansion of City public utility improvements, including, but not necessarily limited to: water and sewer utilities, established parks, recycled water, solid waste disposal,

(b) landfill systems, preventative streets maintenance, street improvements, sustainable energy systems, and drainage infrastructure systems

(b) To inspect and approve City public utility projects prior to acceptance by the City.

**2.2.504 Immunities**

Nothing in this Article is intended to modify, negate, eliminate, or remove any immunities the City or Public Utilities Director may have under the Municipal Code or State law regarding the preparation, review and discretionary approval of plans and specifications.

Section 3 This Ordinance shall go into effect and be in full force from and after thirty (30) days after its final passage and adoption.

APPROVED: October 17, 2022

_____	_____
Mayor	City Clerk
* * * * *	* * * * *

The foregoing Ordinance was introduced and read at a regular meeting of the City Council held on October 17, 2022, and was adopted at a regular meeting of said Council held on November 7, 2022, by the following vote, to wit:

- AYES:
- NOES:
- ABSENT:
- ABSTAIN:
  
- DATED:

\_\_\_\_\_  
City Clerk

RESOLUTION-22- \_\_\_\_\_

**RESOLUTION OF THE CITY COUNCIL OF THE CITY OF CLOVIS APPROVING AMENDMENTS TO THE CITY’S CLASSIFICATION PLAN FOR THE PUBLIC UTILITIES DIRECTOR CLASSIFICATION**

**WHEREAS**, a review of the Public Utilities Director responsibilities has identified a need to update the classification specification; and

**WHEREAS**, it has been determined that the classification should be amended in order to accurately state the requirements needed for the classification; and

**WHEREAS**, modification of the City’s Classification Plan requires authorization by the City Council.

**NOW THEREFORE, BE IT RESOLVED**, that the City of Clovis shall modify the City’s Classification Plan to include the revised Public Utilities Director classification specification (Attachment A).

\* \* \* \* \*

The foregoing resolution was introduced and adopted at a regular meeting of the City Council of the City of Clovis held on October 17, 2022, by the following vote, to wit.

- AYES:
- NOES:
- ABSENT:
- ABSTAIN:

DATED:

\_\_\_\_\_  
Mayor

\_\_\_\_\_  
City Clerk

**ATTACHMENT 2**

## City of Clovis PUBLIC UTILITIES DIRECTOR

### DEFINITION

Under administrative direction, to plan, organize and direct the City's field services and utilities activities; to advise the City Manager and City Council regarding public utility matters; and to perform related work as required.

### CLASS CHARACTERISTICS

This one-position classification is the operational management officer of the Public Utilities Department. The incumbent is responsible to the City Manager for advice and consultation on engineering and operational matters including water supply, production and distribution, water meter reading, fleet maintenance and renewal, sewer, reclaimed water, and storm drain maintenance, parks and landscape maintenance, traffic signals and street lighting, solid waste, landfill operations, street sweeping, and street maintenance, regulatory compliance, and utility structure. The Public Utilities Director exercises supervision over other managerial employees, making assignments, setting priorities, training, and reviewing work. The incumbent is responsible for preparing performance evaluations, processing employee grievances, recommending employment, and for taking and recommending disciplinary action. The position in this class acts with a high degree of independence of action in the assigned area of responsibility. Direction received consists of the assignment of the responsibility to attain objectives according to policy guidelines. The incumbent is expected to develop methods and procedures and solve problems encountered. Except where a deviation in policy is involved, most work is not reviewed directly by a supervisor and when work is reviewed, the review is directed toward final outcomes and results. This is an exempt position in which the incumbent serves at the will of the City Manager.

### EXAMPLES OF DUTIES

Plans, organizes and controls the activities of the Public Utilities Department comprised of and maintenance and operations divisions, including fresh water supply and distribution, sewer maintenance, reclaimed water, street maintenance, storm drainage, park maintenance, fleet, traffic signals and street lighting, and solid waste collection and disposal; evaluates the need for and develops plans and schedules for long-range utilities programs; organizes available resources for the maintenance, improvement and repair of utilities facilities; compiles estimates, contract provisions and specifications; confers with the City Manager and various public groups on proposed projects and improvements; confers with subordinates on the construction, repair and maintenance of facilities; interacts with other departments on problems of design, materials and processes proposed in connection with new construction or major repairs; approve plans on behalf of the City for construction of City public utility maintenance and operation improvements; inspect and approve City public utility and maintenance improvements; prepares ordinances for Council consideration; determines and recommends

## ATTACHMENT A

levels of service for utilities, street sweeping, park maintenance, fleet, traffic signals and street lighting, refuse collection and storm drains; participates in the selection of new employees; represents the City in relations with other governmental agencies; directs the solid waste disposal program; confers with private engineering firms and developers; conducts field inspections; formulates program definition and policy; develops and administers budget; conducts performance evaluations; explains policies, procedures and objectives of the department to staff by written directive and by oral communications; conducts staff meetings; and performs related work as required.

## TYPICAL QUALIFICATIONS

### LICENSE REQUIRED

- Possession of a valid and appropriate California Driver's License and a good driving record.
- Possession of ~~registration as an~~ a current and valid Civil Engineer license from ~~with~~ the State of California Department of Consumer Affairs Board for Professional Engineers, Land Surveyors, and Geologists.

## EDUCATION AND EXPERIENCE

### Education:

- Graduation from an accredited college or university with a Bachelor's Degree in Civil Engineering ~~major work in civil, mechanical, electrical or safety engineering~~ or a closely related field.

### Education Desirable:

- A master's degree in Civil Engineering or a closely related field. ~~is desirable.~~

### Experience:

- A minimum of five (5) years of increasingly responsible professional civil engineering and administrative experience, with ~~at least~~ a minimum of three (3) years in a supervisory or administrative capacity in municipal or county government.

## QUALIFICATIONS

### Knowledge of:

- Technical, legal, financial and public relations problems involved in the conduct of municipal public works programs;
- Methods of preparing designs, plans, specifications, estimates, reports and recommendations relating to municipal utilities and proposed public works facilities;
- Federal, state and local laws and regulations relating to municipal public works and utilities;
- Principles of supervision and training;
- Engineering principles and practices as applied to the field of municipal utilities;
- Appropriate safety precautions and procedures.

Ability to:

- Prepare comprehensive and complex technical reports;
- Provide leadership and a clear focus on mission to establish and maintain effective working relationships with subordinates, public groups and organizations, City officials and private and governmental agencies;
- Understand pertinent procedures and functions quickly;
- Read, understand and apply highly complex materials;
- Formulate and administer budgets;
- Communicate clearly and concisely, orally and in writing;
- Establish and maintain effective relationships with those contacted in the course of work.

#### **SUPPLEMENTAL INFORMATION PHYSICAL DMANDS AND WORKING CONDITIONS**

- Incumbent is required to attend ~~periodic~~ frequent evening meetings.
- Incumbent is required to travel within and outside of City to attend meetings.
- Positions in this classification are designated as confidential under the Meyers-Millais Brown Act and are exempt employees under the Fair Labor Standards Act;
- Work is primarily sedentary.



# CITY *of* CLOVIS

## REPORT TO THE CITY COUNCIL

TO: Mayor and City Council

FROM: Planning and Development Services

DATE: October 17, 2022

SUBJECT: Consider items related to the incorporation of vehicle miles traveled (VMT) into the General Plan Circulation Element. City of Clovis, applicant.

a. Consider Approval – Res. 22-\_\_\_\_, A request to certify a supplemental environmental impact report, adopt findings of fact, and adopt a mitigation monitoring and reporting program.

b. Consider Approval – Res. 22-\_\_\_\_, GPA2022-003, A request to amend the 2014 General Plan to incorporate policy changes to the Circulation Element to incorporate provisions related to the vehicle miles traveled traffic impact evaluation criterion.

c. Consider Approval – Res. 22-\_\_\_\_, A request to adopt updated transportation impact analysis guidelines.

**Staff:** Dave Merchen, City Planner

**Recommendation:** Approve

ATTACHMENTS:

1. Res. 22-\_\_\_\_ EIR
2. Res. 22-\_\_\_\_ GPA
3. Res. 22-\_\_\_\_ TIA Guidelines
4. Draft EIR
5. Final EIR

### CONFLICT OF INTEREST

None.

### RECOMMENDATION

Staff recommends that the City Council adopt resolutions to certify a supplemental environmental impact report (EIR) for the Project, approve GPA2022-003 incorporating vehicle miles traveled (VMT) policies into the Circulation Element, and adopt updated transportation impact analysis (TIA) guidelines.



## EXECUTIVE SUMMARY

On July 1, 2020, the metric by which transportation impacts are assessed pursuant to the California Environmental Quality Act (CEQA) guidelines shifted from a level of service (LOS) based analysis, to VMT analysis. In short, the methodology for analyzing transportation impacts under CEQA transitioned from assessing increases in delay and congestion caused by a project to assessing the average distance traveled by vehicles related to the project, known as VMT. The proposed project would modify existing policies in the Circulation Element and add new policies to reflect the new requirements. The City's TIA Guidelines have also been updated to establish thresholds for VMT impacts to provide guidance on evaluating proposed projects under the VMT criteria.

A Supplemental EIR to the 2014 General Plan EIR has been prepared to evaluate the potential environmental impacts associated with the proposed Project. The EIR determined that implementation of the General Plan may result in VMT metrics that are greater than the applicable thresholds despite the application of feasible mitigation measures, resulting in significant and unavoidable impacts. The City Council will consider the adoption of a statement of overriding considerations in conjunction with its consideration of the Project. A statement of overriding considerations is a determination that specific economic, legal, social, technological, or other benefits of a proposed project outweigh the unavoidable adverse environmental effects, allowing the adverse environmental effects to be considered acceptable.

The Planning Commission considered the project at its September 22, 2022, meeting. Resolutions recommending approval of each project component were adopted in a 4-0 vote, Commissioner Bedsted absent.

## BACKGROUND

- February 18, 2020: The City Council authorized the City Manager to enter into a consultant agreement with Kittelson and Associates, Inc. for modifying the City's Transportation Impact Analysis Guidelines to incorporate VMT analysis criteria.
- July 1, 2020: New state law (SB 743) went into effect changing the metric by which transportation impacts are assessed pursuant to the California Environmental Quality Act (CEQA) guidelines from a level of service (LOS) based analysis to VMT analysis.
- July 20, 2020: The City Council adopted Interim VMT Guidelines for the City so that development could continue moving forward and appropriately assess traffic impacts using the new VMT metric. The "final" version is included as part of the Project currently under consideration.
- April 5, 2021: The City Council authorized the City Manager to amend the previously approved agreement with Kittelson and Associates to include making modifications to the City's 2014 General Plan Circulation Element and preparing a Supplemental EIR to the General Plan EIR.

## PROPOSAL AND ANALYSIS

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

As the City developed the Interim TIA Guidelines in response to the requirements of SB 743, it became evident that the City's 2014 General Plan Circulation Element needed to be updated to be in alignment with the State's mandates and the Interim TIA Guidelines. The City then initiated an update to the Circulation Element, which focuses on policy language additions that are aimed at reducing VMT by way of a variety of planning mechanisms. Proposed policy changes are outlined in **Attachment 2A**. Proposed policy changes only affect the Circulation Element, and no land use or other changes are included.

Proposed changes to the Circulation Element include adding language to the "Overarching Goal" to "encourage reduction in VMT through well-planned pedestrian connections and improved connectivity." Proposed Policy 2.6 specifies that development projects shall "comply with the City's VMT Transportation Impact Analysis Guidelines and provide the appropriate VMT mitigation measures as determined through the analysis." Examples of other policy changes include promoting carpooling, exploring the feasibility of a VMT mitigation fee program, and partnering with local and regional agencies and stakeholders to explore VMT mitigation measures at the regional scale. A set of new policies (Policies 8.1-8.6) encourages improved connectivity through alternative modes of transportation, focusing on transportation demand measures, transit, bicycle lanes, non-vehicular connectivity between uses, community outreach, and employer commute programs.

### Transportation Impact Analysis (TIA) Guidelines

As described above, in February of 2020, the City initiated efforts to establish a framework for analyzing transportation impacts that was consistent with both State's mandates and City policy. This effort led to the development of the Interim TIA Guidelines (adopted July 20, 2020, Resolution 20-93), which provides guidance to City staff, applicants, and consultants on the requirements to evaluate transportation impacts for projects in the City for the purpose of determining impacts under the California Environmental Quality Act (CEQA). The Interim Guidelines are proposed to be adopted as Final Guidelines in conjunction with the current Project (See **Attachment 3A**). The Transportation Impact Analysis Guidelines are intended to:

- Promote conformance with applicable City and State regulations
- Provide evaluation consistent with CEQA
- Ensure consistency in preparation of studies by applicants and consultants
- Provide predictability in content for City staff and the public in reviewing studies

The Guidelines are intended to be comprehensive, however, not all aspects of every transportation analysis can be addressed within this framework and the City staff reserves the right to use its judgment to request exemptions and/or to modify requirements for specific projects at the time of the review application. The Guidelines provide criteria for “screening out” projects from further VMT analysis, based on factors including the location, type and size of projects. A key component of the Guidelines is the establishment of “thresholds” for determining when VMT impacts are considered significant.

#### **PROJECTS THAT SCREEN OUT**

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

Although the State Office of Planning and Research (OPR) recommends that projects achieve a 15% reduction in VMT from the existing “regional” average, lead agencies have the discretion to adopt different thresholds as long as they are supported by substantial evidence. The evaluation completed by the City and its consulting team supported adjusted thresholds, as follows:

- Residential: A 13% reduction below existing average VMT/capita in Fresno County.
- Office: A 13% reduction below existing average VMT/employee in Fresno County.
- Retail: No net increase in total VMT.
- Other Land Uses: Determined on a case-by-case basis, supported by substantial evidence.
- Mixed Use Projects: Evaluate each component of a mixed-use and apply the significance threshold for each land use type.

Under the VMT methodology, mitigation measures to reduce transportation impacts will shift from relieving traffic congestion through capacity-increasing solutions (i.e. adding lanes, road widening, and traffic signals) to more Transportation Demand Management (TDM) oriented measures. TDM measures focus more on behavioral and infrastructure changes to support and/or encourage shifts in transportation modes away from single-occupancy vehicle use. Because VMT is dependent on location and proximity of residential to employment, goods and services, mitigation measures will be determined on a case-by-case basis.

#### California Environmental Quality Act (CEQA)

The City determined that the proposed Project required the preparation of a Supplemental EIR to the General Plan EIR. Section 15162 of the CEQA Guidelines states that a Supplemental EIR must be prepared for a project if there is a new significant environmental effect or new information of substantial importance that was not known or could not have been known at the time the previous EIR was certified. An evaluation of the proposed Project determined that new information of substantial importance would result, therefore triggering the need for a supplemental EIR. The supplemental-level analysis focuses on the environmental effects from transportation only.

A Draft Supplemental EIR (**Attachment 4**) was completed in June of this year and was made available for review by affected agencies and the public between June 29<sup>th</sup> and August 15<sup>th</sup>. During that period, the City responded to specific questions from local stakeholders, and held a live and virtual public informational session on the proposed Project and the EIR. The City received a total of two comment letters on the Draft EIR, from public agencies (Caltrans, Fresno Metropolitan Flood Control District). The comment letters, as well as the required responses to each comment, are included in the Final EIR (**Attachment 5**).

The Supplemental EIR determined that most potential impacts associated with the proposed policy changes were less than significant. However, the analysis identified that implementation of the General Plan may result in VMT metrics that are greater than the applicable thresholds despite the application of feasible mitigation measures, resulting in significant and unavoidable impacts. Mitigation measures are outlined in a Mitigation Monitoring and Reporting Program (**Attachment 1C**). The identification of significant and unavoidable impacts does not mean that the Project cannot be approved. The City Council will consider the adoption of a statement of overriding considerations in conjunction with its consideration of the Project. A statement of overriding considerations is a determination that specific economic, legal, social, technological, or other benefits of a proposed project outweigh the unavoidable adverse environmental effects, allowing the adverse environmental effects to be considered acceptable.

#### Applicability of the Supplemental EIR to Future Projects

If the City Council ultimately certifies the Supplemental EIR and adopts a statement of overriding considerations, it is anticipated that the original General Plan EIR, combined with the Supplemental EIR will be used in conjunction with future site-specific evaluations. Requirements for analysis of VMT impacts related to future site-specific approvals may be narrowed pursuant to the rules for tiering set forth in CEQA Guidelines.

Future projects will be reviewed under the TIA Guidelines described above. Projects that don't "screen out" of VMT analysis will perform a project specific VMT assessment and appropriate mitigation measures will be incorporated. If the project-level analysis concludes that VMT impacts will be significant and unavoidable, even with feasible mitigation measures applied, the project will be able to tier off of the Supplemental General Plan EIR and eliminate the need to prepare a new EIR based on VMT impacts alone.

#### Public Input

As described above, the City published a public notice and held a public information meeting for the Draft Supplemental EIR. Comments on the EIR as well as required responses are included in the Final EIR. In preparation for the public hearing to consider the general plan amendment and final TIA Guidelines, the City published notice of this public hearing in The Business Journal on September 9, 2022, and October 5, 2022. No comments have been received.

#### Planning Commission Consideration

The Planning Commission considered the proposed project at its September 22, 2022, meeting. During the public hearing, no public testimony was offered and there were no substantive questions or discussion from or by the Planning Commission.

The Commission voted to approve each element of the project with a 4-0 vote, with Commissioner Bedsted absent.

### **FISCAL IMPACT**

None.

### **REASON FOR RECOMMENDATION**

The Project proposes to modify existing goals and policies in the General Plan Circulation Element to reflect the new requirements of SB 743, relating to VMT analysis under the California Environmental Quality Act. The City's TIA Guidelines have also been updated to establish thresholds for VMT impacts and to provide guidance on evaluating proposed projects under the VMT criteria. The Project meets the required findings for the approval of a general plan amendment, as outlined below.

#### *Findings for Approval of a General Plan Amendment*

The findings to consider when making a decision on a general plan amendment application include:

1. The proposed amendments are internally consistent with goals, policies, and actions of the General Plan;

*The proposed amendments are consistent with existing general plan policies which include an emphasis on multi-modal transportation, neighborhood connectivity, maintaining a job-housing balance, and establishing an appropriate mix of land uses.*

2. The proposed amendments would not be detrimental to the public interest, health, safety, convenience, or general welfare of the City;

*The Project is not detrimental to the public interest, health, safety, and convenience, or general welfare of the City. The proposal would incorporate policy language into the General Plan intended to support compliance with VMT analysis requirements enacted at the State level, and to encourage reductions in VMT in conjunction with project design and review.*

3. If applicable, the parcel is physically suitable (including absence of physical constraints, access, compatibility with adjoining land uses, and provision of utilities) for the requested/ anticipated project;

*Because this finding applies to physical suitability of a parcel, this finding is not applicable to the proposed Project.*

4. There is compelling reason for the amendment.

*The proposal would incorporate policy language into the General Plan intended to support compliance with VMT analysis requirements enacted at the State level.*

**ACTIONS FOLLOWING APPROVAL**

None.

Prepared by: Dave Merchen, City Planner

Reviewed by: City Manager *DM*

**DRAFT  
RESOLUTION 22-\_\_**

**A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF CLOVIS CERTIFYING THE  
SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT FOR GENERAL PLAN  
AMENDMENT 2022-003 AND THE ADOPTION OF UPDATED TRAFFIC IMPACT  
ANALYSIS GUIDELINES, ADOPT CEQA FINDINGS OF FACT AND A STATEMENT OF  
OVERRIDING CONSIDERATIONS, AND ADOPTING A MITIGATION MONITORING  
PROGRAM**

**WHEREAS**, the City of Clovis, 1033 Fifth Street, Clovis CA, 93619, initiated an application for General Plan Amendment 2022-003 to amend the 2014 General Plan to incorporate policy changes to the Circulation Element to incorporate provisions related to the vehicle miles traveled traffic impact evaluation criterion (“the Project”); and

**WHEREAS**, GPA 2022-03 is limited to the policy modifications to the Circulation Element and no land use changes or other amendments are proposed; and

**WHEREAS**, the Project also proposes to update the City’s existing transportation impact analysis (TIA) guidelines to incorporate thresholds and implementation guidance for VMT analysis; and

**WHEREAS**, the City caused to be prepared a Draft Supplemental Environmental Impact Report (“Draft SEIR”) for the Project in June 2022 to evaluate potentially significant adverse environmental impacts associated with the Project; and

**WHEREAS**, the Draft SEIR was made available for a 45-day public review period beginning on June 29, 2022 and ending on August 15, 2022, during which time all interested parties were invited to submit written comments on the Draft SEIR for consideration by the Planning Commission and City Council; and

**WHEREAS**, a public meeting was held on July 19, 2022 to provide information on the Project and the Draft SEIR and to allow interested parties to ask questions; and

**WHEREAS**, the City caused to be prepared a Final Supplemental Environmental Impact Report (“Final SEIR”) for the Project, dated September 2022, which contains comments upon the Draft SEIR and responses thereto, as well as changes and additions to the Draft SEIR text and a mitigation monitoring and reporting program; and

**WHEREAS**, the Draft SEIR and the Final SEIR collectively make up the Environmental Impact Report (“EIR”) for the Project; and

**WHEREAS**, the Draft SEIR and Final SEIR were prepared, circulated, and made available for public comment in accordance with the California Environmental Quality Act (“CEQA”), Public Resources Code, Sections 21000 et seq., and the Guidelines for Implementation of CEQA, 14 California Code of Regulations, Sections 15000 et seq. (the “CEQA Guidelines”); and

**WHEREAS**, the Planning Commission held a noticed Public Hearing on September 22, 2022 to consider the Project and the EIR, at which time interested persons were given opportunity to comment on the Project; and

**WHEREAS**, the Planning Commission voted and recommended that the Council certify the EIR and approve the project, including the adoption of findings of fact and a statement of overriding considerations; and

**WHEREAS**, the Planning Commission's action was forwarded to the City Council for consideration; and

**WHEREAS**, the City Council held a noticed Public Hearing on October 17, 2022 to consider the Planning Commission's recommendations and to consider the Project and the EIR; and

**WHEREAS**, the City Council has had an opportunity to review and consider the entire Administrative Record relating to the Project and the EIR, which is on file with the City's Department of Planning and Development Services ("Department"), and reviewed and considered those portions of the Administrative Record determined to be necessary to make an informed decision, including, but not necessarily limited to, the staff report, the written materials submitted with the request, and the verbal and written testimony and other evidence presented during the public hearing; and

**WHEREAS**, the City Council has independently reviewed and considered the EIR; and

**WHEREAS**, the City Council has evaluated and considered all comments, written and oral, received from persons who reviewed the Draft SEIR or the Final SEIR, or otherwise commented on the Project; and

**WHEREAS**, the City Council has independently reviewed and considered the CEQA Statement of Facts and Findings (**Attachment A**), the proposed form of Statement of Overriding Considerations (**Attachment B**), and Mitigation Monitoring and Reporting Program (**Attachment C**).

**NOW, THEREFORE, BASED UPON THE ENTIRE RECORD OF THE PROCEEDINGS, THE CITY COUNCIL RESOLVES AND FINDS AS FOLLOWS:**

1. Finds that the EIR for the Project is adequate and has been completed in compliance with CEQA and the CEQA Guidelines.
2. Finds and declares that the EIR was presented to the City Council and that the City Council has independently reviewed and considered the information contained in the EIR prior to recommending approval of the Project.
3. Based upon its review of the EIR, finds that the EIR is an adequate assessment of the potentially significant environmental impacts of the Project as described in the



EIR, sets forth a reasonable range of alternatives to the Project, and represents the independent judgment of the City Council.

4. Finds that the Final SEIR additions, clarifications, amplifications, modifications and other information in response to comments on the Draft SEIR are not significant new information as that term is defined under the provisions of CEQA or the CEQA Guidelines because such changes and additional information do not indicate that (i) any new significant environmental impacts not already evaluated would result from the Project (ii) there is any substantial increase in the severity of any environmental impact from the Project, (iii) any feasible mitigation measures considerably different from those previously analyzed in the Draft SEIR have been proposed that would lessen significant environmental impacts of the Project, or (iv) any feasible alternatives considerably different from those analyzed in the Draft SEIR have been proposed that would lessen the significant environmental impacts of the Project. Accordingly, the City Council hereby finds and determines that recirculation of the Final SEIR for further public review and comment is not warranted.
5. The City Council has balanced the benefits of the Project against the significant and unavoidable impacts associated with the Project, has considered all feasible mitigation measures, and has examined potentially feasible alternatives to the Project.
6. Finds that none of the project alternatives analyzed in the EIR meet the Project objectives to the same degree as the Project and none of the alternatives are environmentally preferable to the proposed Project.
7. Finds that, after considering all feasible mitigation measures and weighing the advantages and disadvantages of the Project, as proposed, with the Project alternatives, including the significant and unavoidable impacts, the feasibility of project alternatives, and the “no project” alternative, the Project as proposed and described in the EIR may be approved.
8. Certifies the EIR as adequate and completed in compliance with CEQA and the CEQA Guidelines.
9. Adopts the CEQA Statement of Facts and Findings set forth in **Attachment A**.
10. Adopts a Statement of Overriding Considerations substantially in the form set forth in **Attachment B**, with such modifications, additions or deletions as the City Council deems appropriate.
11. Adopts the Mitigation Monitoring and Reporting Program set forth in **Attachment C**, including the mitigation measures identified therein and as described in the EIR.
12. Directs that the record of proceedings be contained in the Department of Planning and Development Services located at 1033 5th Street, Clovis, CA 93612, and that

the custodian of the record be the City Planner or other person designated by the Director of Planning and Development Services.

\* \* \* \* \*

The foregoing resolution was introduced and adopted at a regular meeting of the City Council of the City of Clovis held on October 17, 2022, by the following vote, to wit.

- AYES:
- NOES:
- ABSENT:
- ABSTAIN:

DATE: October 17, 2022

\_\_\_\_\_  
Mayor

\_\_\_\_\_  
City Clerk

**CEQA STATEMENT OF FACTS AND FINDINGS**

**GPA2022-003 & TIA GUIDELINES**

**2014 GENERAL PLAN CIRCULATION ELEMENT UPDATE**

**I. BACKGROUND**

The California Environmental Quality Act (CEQA) requires that a number of written findings be made by the lead agency in connection with certification of an environmental impact report (EIR) prior to approval of the project pursuant to Sections 15091 and 15093 of the CEQA Guidelines and Section 21081 of the Public Resources Code. This document provides the findings required by CEQA.

**A. PROJECT SUMMARY**

**Interim Transportation Impact Analysis Guidelines**

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

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

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

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

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

## Circulation Element Update

The proposed project is an update to the City of Clovis 2014 General Plan Circulation Element. The Clovis City Council adopted the Clovis General Plan on August 25, 2014. Included in the General Plan is the Circulation Element, which determines the transportation system necessary to accommodate the planned land use and development. The Circulation Element identifies the general location and extent of existing and proposed major transportation facilities, including major thoroughfares, transportation routes, terminals, and other local public utilities and facilities. The goals and policies in this element are closely correlated with the Land Use Element and are intended to provide a balance between the City's future growth and land use development, roadway size, traffic service levels, and community character.

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

### *Focused Update*

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

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

The following presents the proposed changes in a track change form for ease of identifying the proposed text changes.

### *Clovis General Plan Goals and Policies*

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

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

- Policy 1.1 **Multimodal network.** The city shall plan, design, operate, and maintain the transportation network to promote safe and convenient travel for all users: pedestrians, bicyclists, transit riders, freight, and motorists.
- Policy 1.2 **Transportation decisions.** Decisions should balance the comfort, convenience, and safety of pedestrians, bicyclists, and motorists.
- Policy 1.3 **Age and mobility.** The design of roadways shall consider all potential users, including children, seniors, and persons with disabilities.

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

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

- Policy 2.1 **Level of service.** The following is the City's level of service (LOS) standards:
1. Achieve LOS D vehicle traffic operations during the a.m. and p.m. peak hours
  2. Allow exceptions on a case-by-case basis where lower levels of service would result in other public benefits, such as:
    - Preserving agriculture or open space land
    - Preserving the rural/historic character of a neighborhood
    - Preserving or creating a pedestrian-friendly environment in Old Town or mixed-use village districts
    - Avoiding adverse impacts to pedestrians, cyclists, and mass transit riders where right-of-way constraints would make capacity expansion infeasible
- Policy 2.2 **Multimodal LOS.** Monitor the evolution of multimodal level of service (MMLOS) standards. The city may adopt MMLOS standards when appropriate.
- Policy 2.3 **Fair share costs.** New development shall pay its fair share of the cost for circulation improvements in accordance with the city's traffic fee mitigation program.
- Policy 2.4 **Right-of-way dedication.** The city may require right-of-way dedication essential to the circulation system in conjunction with any development or annexation. The City shall request the County of Fresno to apply the same requirements in the Clovis planning area.
- Policy 2.5 **Regional and state roadway funding.** Coordinate with the County of Fresno, City of Fresno, Fresno Council of Governments, and Caltrans to fund roadway improvements adjacent to and within the City's Planning Area.
- Policy 2.6 **Vehicle Miles Traveled.** Development projects shall comply with the City's VMT Transportation Analysis Guidelines and provide the appropriate VMT mitigation measures as determined through the analysis.
- Policy 2.7 **VMT Mitigation Fee Program.** Evaluate the feasibility of a VMT mitigation fee program and explore opportunities for establishing an in-lieu mitigation fee to offset VMT impacts from development.

Policy 2.8 **Partner with local agencies and stakeholders.** Partner with other local and regional agencies and stakeholders to explore VMT mitigation measures at the regional scale.

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

- Policy 3.1 **Traffic calming.** Employ traffic-calming measures in new developments and existing neighborhoods to control traffic speeds and maintain safety.
- Policy 3.2 **Neighborhood compatibility.** Periodically review and update design standards to ensure that new and redesigned streets are compatible with the context of adjacent neighborhoods.
- Policy 3.3 **Old Town and mixed use village centers.** Transportation decisions on local streets in Old Town and mixed-use village centers shall prioritize pedestrians, then bicyclists, then mass transit, then motorists.
- Policy 3.4 **Road diets.** Minimize roadway width as feasible to serve adjacent neighborhoods while maintaining sufficient space for public safety services.
- Policy 3.5 **Roadway widening.** Only consider street widening or intersection expansions after considering multimodal alternative improvements to non-automotive facilities.
- Policy 3.6 **Soundwalls.** Design roadway networks to disperse traffic to minimize traffic levels. Discourage soundwalls along new collector and local streets when feasible.
- Policy 3.7 **Conflict points.** Minimize the number of and enhance safety at vehicular, pedestrian, and bicycle conflict points.
- Policy 3.8 **Access management.** Minimize access points and curb cuts along arterials and prohibit them within 200 feet of an intersection where possible. Eliminate and/or consolidate driveways when new development occurs or when traffic operation or safety warrants.
- Policy 3.9 **Park-once.** Encourage “park-once” designs where convenient, centralized public parking areas are accompanied by safe, visible, and well-marked access to sidewalks and businesses.
- Policy 3.10 **Pedestrian access and circulation.** Entrances at signalized intersections should provide sidewalks on both sides of the entrance that connect to an internal pedestrian pathway to businesses and throughout nonresidential parking lots larger than 50 spaces.
- Policy 3.11 **Right-of-way design.** Design landscaped parkways, medians, and right-of-ways as aesthetic buffers to improve the community’s appearance and encourage non-motorized transportation.
- Policy 3.12 **Residential orientation.** Where feasible, residential development should face local and collector streets to increase visibility and safety of travelers along the streets, and encourage pedestrian and bicycle access.

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

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

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

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

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

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

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

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

- Policy 7.1 **Clovis Avenue extension.** Invest in the extension of Clovis Avenue north to Copper Avenue as funding is available.
- Policy 7.2 **Right-of-way for future extensions.** Coordinate with Fresno County, the Fresno Council of Governments, and Caltrans to preserve future right-of-way for extending Clovis Avenue north of Copper Avenue to Auberry Road and future State Route 65.

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

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

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

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

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

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

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

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

**B. PROJECT OBJECTIVES**

The following objectives were established for the proposed Project:

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

**C. ENVIRONMENTAL REVIEW PROCESS**

In conformance with CEQA, the State CEQA Guidelines, and the City of Clovis CEQA Guidelines, the City of Clovis conducted an environmental review of the proposed project.

- The City of Clovis determined that an EIR would be required for the proposed project and issued a Notice of Preparation (NOP) and Initial Study on April 4, 2022. The public review period extended from April 4, 2022, to May 4, 2022.
- Based upon the Initial Study and Environmental Checklist Form, the City of Clovis staff determined that a Draft Supplemental EIR (SEIR) should be prepared for the proposed project. The scope of the Draft SEIR was determined based on the City’s Initial Study, comments



received in response to the NOP, and comments received at the scoping meeting conducted by the City. Chapter 1.0 of the Draft SEIR describes the issues identified for analysis in the DEIR.

- The City of Clovis prepared a Draft SEIR, which was made available for a 45-day public review period beginning June 29, 2022, and ending August 15, 2022.
- The City prepared a Final EIR (FEIR), including the Responses to Comments to the Draft SEIR, these Findings of Fact, and the Statement of Overriding Considerations. The FEIR/Response to Comments contains comments on the Draft SEIR, responses to those comments, revisions to the Draft SEIR, and appended documents.

#### **D. RECORD OF PROCEEDINGS**

For purposes of CEQA and these Findings, the Record of Proceedings for the proposed project consists of the following documents and other evidence, at a minimum:

- The NOP and all other public notices issued by the City in conjunction with the proposed project
- The FEIR for the proposed project
- The Draft SEIR
- All written comments submitted by agencies or members of the public during the public review comment period on the Draft SEIR
- All responses to written comments submitted by agencies or members of the public during the public review comment period on the Draft SEIR
- All written and verbal public testimony presented during a noticed public hearing for the proposed project
- The Mitigation Monitoring and Reporting Program
- The reports and technical memoranda included or referenced in the Response to Comments
- All documents, studies, EIRs, or other materials incorporated by reference in the Draft SEIR and FEIR
- The Resolutions adopted by the City in connection with the proposed project, and all documents incorporated by reference therein, including comments received after the close of the comment period and responses thereto
- Matters of common knowledge to the City, including but not limited to federal, state, and local laws and regulations
- Any documents expressly cited in these Findings
- Any other relevant materials required to be in the record of proceedings by Public Resources Code Section 21167.6(e)

#### **E. CUSTODIAN AND LOCATION OF RECORDS**

The documents and other materials that constitute the administrative record for the City's actions related to the project are at the City of Clovis, 1033 Fifth Street, Clovis, CA 93612. The City's Department of Planning and Development Services is the custodian of the administrative record for the project. Copies of these documents, which constitute the record of proceedings, are and at all relevant times have been and will be available upon request at the offices of the Department of Planning and Development Services. This information is provided in compliance with Public Resources Code Section 21081.6(a)(2) and Guidelines Section 15091(e).

## F. FINDINGS AND FACTS AND OVERRIDING CONSIDERATIONS

The City of Clovis, as lead agency, is required under CEQA to make written findings concerning each alternative and each significant environmental impact identified in the Draft SEIR and FEIR.

Specifically, regarding findings, Guidelines Section 15091 provides:

- (a) No public agency shall approve or carry out a project for which an EIR has been certified which identifies one or more significant environmental effects of the project unless the public agency makes one or more written findings for each of those significant effects, accompanied by a brief explanation of the rationale for each finding. The possible findings are:
  1. Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the FEIR.
  2. Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.
  3. Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the FEIR.
- (b) The findings required by subsection (a) shall be supported by substantial evidence in the record.
- (c) The finding in subdivision (a)(2) shall not be made if the agency making the finding has concurrent jurisdiction with another agency to deal with identified feasible mitigation measures or alternatives. The finding in subsection (a)(3) shall describe the specific reasons for rejecting identified mitigation measures and project alternatives.
- (d) When making the findings required in subdivision (a)(1), the agency shall also adopt a program for reporting on or monitoring the changes which it has either required in the project or made a condition of approval to avoid or substantially lessen significant environmental effects. These measures must be fully enforceable through permit conditions, agreements, or other measures.
- (e) The public agency shall specify the location and custodian of the documents or other material which constitute the record of the proceedings upon which its decision is based.
- (f) A statement made pursuant to Section 15093 does not substitute for the findings required by this section.

The “changes or alterations” referred to in Section 15091(a)(1) may include a wide variety of measures or actions as set forth in Guidelines Section 15370, including:

- (a) Avoiding the impact altogether by not taking a certain action or parts of an action.
- (b) Minimizing impacts by limiting the degree or magnitude of the action and its implementation.
- (c) Rectifying the impact by repairing, rehabilitating, or restoring the impacted environment.
- (d) Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action.
- (e) Compensating for the impact by replacing or providing substitute resources or environments.

## II. FINDINGS AND FACTS REGARDING IMPACTS

This section of the document is divided into the following parts:

- Part A, *Impacts Determined to Be Less Than Significant or have No Impact*, presents the impacts of the proposed project that were determined in the Initial Study and Draft SEIR to be less than significant or have no impact without the addition of mitigation measures.
- Part B, *Significant Unavoidable Impacts*, presents significant impacts of the proposed project that were identified in the Draft SEIR, the mitigation measures identified in the Mitigation Monitoring and Reporting Program, the findings for significant impacts, and the rationales for the findings.

### A. IMPACTS DETERMINED TO BE LESS THAN SIGNIFICANT OR HAVE NO IMPACT

#### Initial Study

An Initial Study was prepared by the City of Clovis to identify the potential significant effects of the project. As a result of the project scoping process, including the NOP circulated by the City on April 4, 2022, in connection with preparation of the Initial Study; the preparation of the Draft SEIR; and the public scoping meeting held on April 27, 2022, the City determined, based upon the threshold criteria for significance, that the project would have no impact or a less than significant impact on the following potential environmental issues, and therefore determined that these potential environmental issues would not be addressed in the Draft SEIR. Based upon the environmental analysis presented in the Draft SEIR and the comments received by the public on the Draft SEIR, no substantial evidence was submitted to or identified by the City that indicated that the project would have an impact on the following environmental areas:

- (a) **Aesthetics:** This CEQA topic has been adequately analyzed in the certified EIR for the General Plan and Development Code Update (State Clearinghouse No. 2012061069) pursuant to applicable legal standards. The City's policy changes will narrowly affect circulation and transportation topics, but will not have a direct or indirect effect on this CEQA topic. Instead, the City's policy changes would result in no anticipated environmental changes to this CEQA topic when compared to the environmental effects discussed under the certified EIR. As

such, this CEQA topic has been adequately analyzed in the certified EIR pursuant to applicable legal standards, and does not warrant further environmental review in the supplemental analysis. The proposed project would have No Impact relative to this topic.

- (b) **Agriculture and Forestry Resources:** This CEQA topic has been adequately analyzed in the certified EIR for the General Plan and Development Code Update (State Clearinghouse No. 2012061069) pursuant to applicable legal standards. The City's policy changes will narrowly affect circulation and transportation topics, but will not have a direct or indirect effect on this this CEQA topic. Instead, the City's policy changes would result in no anticipated environmental changes to this CEQA topic when compared to the environmental effects discussed under the certified EIR. As such, this CEQA topic has been adequately analyzed in the certified EIR pursuant to applicable legal standards, and does not warrant further environmental review in the supplemental analysis. The proposed project would have No Impact relative to this topic.
- (c) **Air Quality:** This CEQA topic has been adequately analyzed in the certified EIR for the General Plan and Development Code Update (State Clearinghouse No. 2012061069) pursuant to applicable legal standards. The City's policy changes will narrowly affect circulation and transportation topics, but will not have a direct or indirect effect on this this CEQA topic. Instead, the City's policy changes would result in no anticipated environmental changes to this CEQA topic when compared to the environmental effects discussed under the certified EIR. As such, this CEQA topic has been adequately analyzed in the certified EIR pursuant to applicable legal standards, and does not warrant further environmental review in the supplemental analysis. The proposed project would have No Impact relative to this topic.
- (d) **Biological Resources:** This CEQA topic has been adequately analyzed in the certified EIR for the General Plan and Development Code Update (State Clearinghouse No. 2012061069) pursuant to applicable legal standards. The City's policy changes will narrowly affect circulation and transportation topics, but will not have a direct or indirect effect on this this CEQA topic. Instead, the City's policy changes would result in no anticipated environmental changes to this CEQA topic when compared to the environmental effects discussed under the certified EIR. As such, this CEQA topic has been adequately analyzed in the certified EIR pursuant to applicable legal standards, and does not warrant further environmental review in the supplemental analysis. The proposed project would have No Impact relative to this topic.
- (e) **Cultural Resources:** This CEQA topic has been adequately analyzed in the certified EIR for the General Plan and Development Code Update (State Clearinghouse No. 2012061069) pursuant to applicable legal standards. The City's policy changes will narrowly affect circulation and transportation topics, but will not have a direct or indirect effect on this this CEQA topic. Instead, the City's policy changes would result in no anticipated environmental changes to this CEQA topic when compared to the environmental effects discussed under the certified EIR. As such, this CEQA topic has been adequately analyzed in the certified EIR pursuant to applicable legal standards, and does not warrant further environmental review in the supplemental analysis. The proposed project would have No Impact relative to this topic.
- (f) **Energy:** This CEQA topic has been adequately analyzed in the certified EIR for the General Plan and Development Code Update (State Clearinghouse No. 2012061069) pursuant to

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

- (g) **Geology and Soils:** This CEQA topic has been adequately analyzed in the certified EIR for the General Plan and Development Code Update (State Clearinghouse No. 2012061069) pursuant to applicable legal standards. The City's policy changes will narrowly affect circulation and transportation topics, but will not have a direct or indirect effect on this this CEQA topic. Instead, the City's policy changes would result in no anticipated environmental changes to this CEQA topic when compared to the environmental effects discussed under the certified EIR. As such, this CEQA topic has been adequately analyzed in the certified EIR pursuant to applicable legal standards, and does not warrant further environmental review in the supplemental analysis. The proposed project would have No Impact relative to this topic.
- (h) **Greenhouse Gas Emissions:** This CEQA topic has been adequately analyzed in the certified EIR for the General Plan and Development Code Update (State Clearinghouse No. 2012061069) pursuant to applicable legal standards. The City's policy changes will narrowly affect circulation and transportation topics, but will not have a direct or indirect effect on this this CEQA topic. Instead, the City's policy changes would result in no anticipated environmental changes to this CEQA topic when compared to the environmental effects discussed under the certified EIR. As such, this CEQA topic has been adequately analyzed in the certified EIR pursuant to applicable legal standards, and does not warrant further environmental review in the supplemental analysis. The proposed project would have No Impact relative to this topic.
- (i) **Hazards and Hazardous Materials:** This CEQA topic has been adequately analyzed in the certified EIR for the General Plan and Development Code Update (State Clearinghouse No. 2012061069) pursuant to applicable legal standards. The City's policy changes will narrowly affect circulation and transportation topics, but will not have a direct or indirect effect on this this CEQA topic. Instead, the City's policy changes would result in no anticipated environmental changes to this CEQA topic when compared to the environmental effects discussed under the certified EIR. As such, this CEQA topic has been adequately analyzed in the certified EIR pursuant to applicable legal standards, and does not warrant further environmental review in the supplemental analysis. The proposed project would have No Impact relative to this topic.
- (j) **Hydrology and Water Quality:** This CEQA topic has been adequately analyzed in the certified EIR for the General Plan and Development Code Update (State Clearinghouse No. 2012061069) pursuant to applicable legal standards. The City's policy changes will narrowly affect circulation and transportation topics, but will not have a direct or indirect effect on this this CEQA topic. Instead, the City's policy changes would result in no anticipated environmental changes to this CEQA topic when compared to the environmental effects discussed under the certified EIR. As such, this CEQA topic has been adequately analyzed in the certified EIR pursuant to applicable

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

- (k) **Land Use and Planning:** This CEQA topic has been adequately analyzed in the certified EIR for the General Plan and Development Code Update (State Clearinghouse No. 2012061069) pursuant to applicable legal standards. The City's policy changes will narrowly affect circulation and transportation topics, but will not have a direct or indirect effect on this this CEQA topic. Instead, the City's policy changes would result in no anticipated environmental changes to this CEQA topic when compared to the environmental effects discussed under the certified EIR. As such, this CEQA topic has been adequately analyzed in the certified EIR pursuant to applicable legal standards, and does not warrant further environmental review in the supplemental analysis. The proposed project would have No Impact relative to this topic.
- (l) **Mineral Resources:** This CEQA topic has been adequately analyzed in the certified EIR for the General Plan and Development Code Update (State Clearinghouse No. 2012061069) pursuant to applicable legal standards. The City's policy changes will narrowly affect circulation and transportation topics, but will not have a direct or indirect effect on this this CEQA topic. Instead, the City's policy changes would result in no anticipated environmental changes to this CEQA topic when compared to the environmental effects discussed under the certified EIR. As such, this CEQA topic has been adequately analyzed in the certified EIR pursuant to applicable legal standards, and does not warrant further environmental review in the supplemental analysis. The proposed project would have No Impact relative to this topic. **Noise:** This CEQA topic has been adequately analyzed in the certified EIR for the General Plan and Development Code Update (State Clearinghouse No. 2012061069) pursuant to applicable legal standards. The City's policy changes will narrowly affect circulation and transportation topics, but will not have a direct or indirect effect on this this CEQA topic. Instead, the City's policy changes would result in no anticipated environmental changes to this CEQA topic when compared to the environmental effects discussed under the certified EIR. As such, this CEQA topic has been adequately analyzed in the certified EIR pursuant to applicable legal standards, and does not warrant further environmental review in the supplemental analysis. The proposed project would have No Impact relative to this topic.
- (m) **Population and Housing:** This CEQA topic has been adequately analyzed in the certified EIR for the General Plan and Development Code Update (State Clearinghouse No. 2012061069) pursuant to applicable legal standards. The City's policy changes will narrowly affect circulation and transportation topics, but will not have a direct or indirect effect on this this CEQA topic. Instead, the City's policy changes would result in no anticipated environmental changes to this CEQA topic when compared to the environmental effects discussed under the certified EIR. As such, this CEQA topic has been adequately analyzed in the certified EIR pursuant to applicable legal standards, and does not warrant further environmental review in the supplemental analysis. The proposed project would have No Impact relative to this topic.
- (n) **Hazards and Hazardous Materials:** This CEQA topic has been adequately analyzed in the certified EIR for the General Plan and Development Code Update (State Clearinghouse No. 2012061069) pursuant to applicable legal standards. The City's policy changes will narrowly affect circulation and transportation topics, but will not have a direct or indirect effect on this

this CEQA topic. Instead, the City's policy changes would result in no anticipated environmental changes to this CEQA topic when compared to the environmental effects discussed under the certified EIR. As such, this CEQA topic has been adequately analyzed in the certified EIR pursuant to applicable legal standards, and does not warrant further environmental review in the supplemental analysis. The proposed project would have No Impact relative to this topic.

- (o) **Public Services:** This CEQA topic has been adequately analyzed in the certified EIR for the General Plan and Development Code Update (State Clearinghouse No. 2012061069) pursuant to applicable legal standards. The City's policy changes will narrowly affect circulation and transportation topics, but will not have a direct or indirect effect on this this CEQA topic. Instead, the City's policy changes would result in no anticipated environmental changes to this CEQA topic when compared to the environmental effects discussed under the certified EIR. As such, this CEQA topic has been adequately analyzed in the certified EIR pursuant to applicable legal standards, and does not warrant further environmental review in the supplemental analysis. The proposed project would have No Impact relative to this topic.
- (p) **Recreation:** This CEQA topic has been adequately analyzed in the certified EIR for the General Plan and Development Code Update (State Clearinghouse No. 2012061069) pursuant to applicable legal standards. The City's policy changes will narrowly affect circulation and transportation topics, but will not have a direct or indirect effect on this this CEQA topic. Instead, the City's policy changes would result in no anticipated environmental changes to this CEQA topic when compared to the environmental effects discussed under the certified EIR. As such, this CEQA topic has been adequately analyzed in the certified EIR pursuant to applicable legal standards, and does not warrant further environmental review in the supplemental analysis. The proposed project would have No Impact relative to this topic.
- (q) **Tribal Cultural Resources:** This CEQA topic has been adequately analyzed in the certified EIR for the General Plan and Development Code Update (State Clearinghouse No. 2012061069) pursuant to applicable legal standards. The City's policy changes will narrowly affect circulation and transportation topics, but will not have a direct or indirect effect on this this CEQA topic. Instead, the City's policy changes would result in no anticipated environmental changes to this CEQA topic when compared to the environmental effects discussed under the certified EIR. As such, this CEQA topic has been adequately analyzed in the certified EIR pursuant to applicable legal standards, and does not warrant further environmental review in the supplemental analysis. The proposed project would have No Impact relative to this topic.
- (r) **Utilities and Service Systems:** This CEQA topic has been adequately analyzed in the certified EIR for the General Plan and Development Code Update (State Clearinghouse No. 2012061069) pursuant to applicable legal standards. The City's policy changes will narrowly affect circulation and transportation topics, but will not have a direct or indirect effect on this this CEQA topic. Instead, the City's policy changes would result in no anticipated environmental changes to this CEQA topic when compared to the environmental effects discussed under the certified EIR. As such, this CEQA topic has been adequately analyzed in the certified EIR pursuant to applicable legal standards, and does not warrant further environmental review in the supplemental analysis. The proposed project would have No Impact relative to this topic.

- (s) **Wildfire:** This CEQA topic has been adequately analyzed in the certified EIR for the General Plan and Development Code Update (State Clearinghouse No. 2012061069) pursuant to applicable legal standards. The City’s policy changes will narrowly affect circulation and transportation topics, but will not have a direct or indirect effect on this CEQA topic. Instead, the City’s policy changes would result in no anticipated environmental changes to this CEQA topic when compared to the environmental effects discussed under the certified EIR. As such, this CEQA topic has been adequately analyzed in the certified EIR pursuant to applicable legal standards, and does not warrant further environmental review in the supplemental analysis. The proposed project would have No Impact relative to this topic.

**Draft SEIR**

This section identifies impacts of the proposed project determined to be less than significant without implementation of project-specific mitigation measures. This determination assumes compliance with Existing Regulations and existing and proposed General Plan Update Policies as detailed in Chapter 3.1 of the Draft SEIR.

- (a) **Transportation and Traffic:** The proposed Project would not conflict with a program, plan, policy or ordinance addressing the circulation system, including transit, bicycle, and pedestrian facilities; or increase hazards due to a design feature, incompatible uses, or inadequate emergency access.
- (b) **Cumulative Transportation and Traffic:** Under Cumulative conditions, General Plan implementation may conflict with a program, plan, policy or ordinance addressing the circulation system, including transit, bicycle, and pedestrian facilities; or increase hazards due to a design feature, incompatible uses, or inadequate emergency access.

**B. SIGNIFICANT UNAVOIDABLE IMPACTS**

The following summary describes the unavoidable adverse impact of the proposed project where either mitigation measures were found to be infeasible or mitigation would not lessen impacts to less than significant. The following impact would remain significant and unavoidable:

**1. Transportation and Traffic**

---

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

---

**Finding 1** – The City hereby makes Finding 1 given that VMT reduction depends on factors such as actual implementation of planned land use development, demographic change, household preferences for housing types and locations, the cost of fuel, and the competitiveness of transit relative to driving, which relates to congestion along vehicular commute routes that are not under the City’s jurisdiction, as well as transit provided by agencies other than the City. The feasibility and effectiveness of the mitigation measures is unknown at this time. The City cannot demonstrate definitively at this time that implementation of these policies would achieve VMT reductions to meet the VMT per capita threshold on an individual project-level, or on a region-wide level. It is possible that projects of any size and makeup and determined to exceed the VMT threshold established under the TIA Guidelines, even where the project is consistent with the land uses and policy direction of



the General Plan. Therefore, this impact is significant and unavoidable. In order to approve the proposed General Plan Update, a Statement of Overriding Considerations will be required.

### **Facts in Support of Finding**

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

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

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

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

### **Mitigation Measure**

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

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

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

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

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

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

***Mitigation Measure TRANS-3: Provide Bicycle Facilities:*** *The City shall require land uses that generate more than 500 daily trips (which is the threshold that screens small projects from a detailed VMT analysis) to provide bike*

*parking, bike lockers, showers, and personal lockers. This measure is designed to promote commuting by bicycle and support transit first/last mile access. Bicycle facilities shall be required to be constructed in conjunction with each project and funded by the applicant.*

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

**2. Transportation and Traffic**

---

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

---

**Finding 2** – The City hereby makes Finding 2 given that, while the Circulation Element policies are expected to help reduce the cumulative VMT, it is not anticipated that they would be sufficient to achieve the reduction of 13% below existing baseline for the City as a whole. Additionally, the Circulation Element Update does not affect the land use patterns of the General Plan. The following mitigation measures would be required in conjunction with the development of land use and infrastructure projects under the General Plan in order to mitigate the VMT impacts to the extent feasible. However, there are no feasible mitigation measures that would fully mitigate this cumulative impact. Therefore, this impact is significant and unavoidable. In order to approve the proposed General Plan Update, a Statement of Overriding Considerations will be required.

**Facts in Support of Finding**

Cumulative VMT was calculated for the Clovis General Plan area including current city limits and the sphere of influence (SOI). Residential VMT per capita would decrease by 5%, from 16.1 to 15.3, but would still be above the impact threshold of 14.0. Non-residential VMT per employee would decrease by 18%, from 24.6 to 20.1, and would be below the impact threshold of 22.3. VMT is largely a function of land use patterns, and integrated transportation infrastructure.

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

While these policies are expected to help reduce the cumulative VMT, it is not anticipated that they would be sufficient to achieve the reduction of 13% below existing baseline for the City as a whole.

Additionally, the Circulation Element Update does not affect the land use patterns of the General Plan. The following mitigation measures would be required in conjunction with the development of land use and infrastructure projects under the General Plan in order to mitigate the VMT impacts to the extent feasible. However, there are no feasible mitigation measures that would fully mitigate this cumulative impact. This impact will remain significant and unavoidable and cumulatively considerable.

### III. ALTERNATIVES TO THE PROPOSED PROJECT

#### A. ALTERNATIVES SELECTED FOR FURTHER ANALYSIS

The following alternatives were determined to represent a reasonable range of alternatives with the potential to feasibly attain most of the basic objectives of the project but avoid or substantially lessen any of the significant effects of the project. The alternatives are analyzed in detail in the following section.

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

##### **No Project Alternative**

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

**Finding:** The No Project Alternative would be physically feasible but would not be as economically feasible as the proposed General Plan Update. The proposed Project more accurately reflects the City's (including business owners and residents) future planning goals for their community. In addition, the Circulation Element Update is needed to reflect recent legislative changes (e.g., SB 743, Complete Streets Act, etc.), the economy and market, and emerging best practices.

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

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

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

This alternative would not achieve any of the Project objectives as it would not update City Policy in the Circulation Element and would not establish Transportation Impact Analysis Guidelines. Overall, the No Project Alternative would meet any of the project objectives. Therefore, it has been rejected by the City in favor of the proposed Project.

### **Policy Change Only Alternative**

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

**Finding:** The TIA Guidelines Only Alternative would be physically feasible but would not meet the first or third objective as updates to City Policies and Guidelines would not occur.

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

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

Nevertheless, this alternative would not be as responsive to the Project objectives as the proposed Project. The proposed Project more accurately reflects the City's (including business owners and residents) future planning goals for their community. Thus, it has been rejected by the City in favor of the proposed Project.

### **TIA Guidelines Only Alternative**

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

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

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

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

Additionally, this alternative would not be as responsive to the Project objectives as the proposed Project. The proposed Project more accurately reflects the City's (including business owners and residents) future planning goals for their community. Therefore, the City rejects this alternative in favor of the proposed project.

## FORM OF STATEMENT OF OVERRIDING CONSIDERATIONS

### GPA2022-003 & TIA GUIDELINES 2014 GENERAL PLAN CIRCULATION ELEMENT UPDATE

#### Introduction

The City of Clovis is the lead agency under CEQA responsible for preparation, review, and certification of the Final EIR for the 2014 Clovis General Plan Circulation Element Update. As the lead agency, the City is also responsible for determining the potential environmental impacts of the proposed action, which of those impacts are significant, and which can be mitigated through imposition of mitigation measures to avoid or minimize those impacts to a level of less than significant. CEQA then requires the lead agency to balance the benefits of a proposed action against its significant unavoidable adverse environmental impacts in determining whether or not to approve the proposed project (Project). In making this determination, the City is guided by State CEQA Guidelines Section 15093, which provides:

CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered “acceptable.”

When the lead agency approves a project which will result in the occurrence of significant effects which are identified in the final EIR but are not avoided or substantially lessened, the agency shall state in writing the specific reasons to support its action based on the Final EIR and/or other information in the record. The statement of overriding considerations shall be supported by substantial evidence in the record.

If an agency makes a statement of overriding considerations, the statement should be included in the record of the project approval and should be mentioned in the notice of determination. This statement does not substitute for, and shall be in addition to, findings required pursuant to Section 15091.

In addition, Public Resources Code, Section 21081(b), requires that where a public agency finds that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in an EIR and thereby leave significant unavoidable effects, the public agency must also find that overriding economic, legal, social, technological, or other benefits of the project outweigh the significant effects of the project.

Pursuant to Public Resources Code Section 21081(b) and the State CEQA Guidelines Section 15093, the City of Clovis has balanced the benefits of the Project against the following unavoidable adverse impacts associated with the Project and has adopted all feasible mitigation measures with respect to these impacts. The City also has examined alternatives to the Project, none of which both meets the Project objectives and is environmentally preferable to the proposed Project for the reasons discussed in the Findings and Facts in Support of Findings.

### **Significant Unavoidable Adverse Environmental Impacts**

Although nearly all potential Project impacts have been substantially avoided or mitigated, as described in the Findings and Facts in Support of Findings, there remain two Project impacts for which complete mitigation is not feasible. The impacts and alternatives are described below and were also addressed in the Findings.

The Supplemental EIR (SEIR) identified the following significant unavoidable adverse impacts of the proposed Project:

#### ***Transportation and Traffic***

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

Year 2042 conditions with the Circulation Element update would result in decreased VMT per capita and VMT per employee in comparison to the 2019 baseline condition in Clovis. Residential VMT per capita would decrease by 5%, from 16.1 to 15.3, but would still be above the impact threshold of 14.0. Non-residential VMT per employee would decrease by 18%, from 24.6 to 20.1, and would be below the impact threshold of 22.3.

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

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



existing, or planned, uses that are less mixed, and are more isolated and distant from other uses that serve residents/employees living in the area. The more separated, or isolated, housing is from retail, offices, and community facilities, the greater the trip lengths will be for those individuals. This will result in higher VMT per capita for people living in those areas.

Implementing the goals and policies presented in the proposed Circulation Element and discussed in Chapter 3.1 of the Draft EIR are intended to promote accessibility, encourage non-vehicle transportation modes, expand transit services, and develop TDM program requirements that reduce VMT associated with new development. When implemented, these types of policies can influence social behaviors by presenting a resident/employee with more transportation choices. The more times non-motorized transportation choices are selected as a method of travel, the more reduction in VMT per capita will be observed within the population.

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

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

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

### ***Cumulative Transportation and Traffic***

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

the sphere of influence (SOI). Residential VMT per capita would decrease by 5%, from 16.1 to 15.3, but would still be above the impact threshold of 14.0. Non-residential VMT per employee would decrease by 18%, from 24.6 to 20.1, and would be below the impact threshold of 22.3. VMT is largely a function of land use patterns, and integrated transportation infrastructure.

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

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

### **Alternatives**

In addition, the Draft SEIR evaluated the following three alternatives for their potential to avoid or substantially lessen the significant impacts of the proposed Project:

- **No Project Alternative:** This alternative assumes that there would be no focused update to its existing General Plan. There would be no policy changes to the Circulation Element, and the City would not adopt Transportation Impact Analysis Guidelines supportive of the Circulation Element. Under this alternative, the City would not be making any policy changes in response to SB 743, but would still be required to analyze projects for VMT. In the absence of defined TIA Guidelines, the City would utilize the Office of Planning and Research (OPR) Guidance for analyzing VMT.
- **Policy Change Only Alternative:** This alternative assumes that there would be a focused update to its existing General Plan. This would include policy changes to the Circulation Element intended to meet the mandates of State law related to conformance with SB 743. Under this alternative, the City would not adopt Transportation Impact Analysis Guidelines supportive of the Circulation Element, but would still be required to analyze projects for VMT. In the absence of defined TIA Guidelines, the City would utilize the OPR Guidance for analyzing VMT.
- **TIA Guidelines Only Alternative:** This alternative assumes that there would be no focused update to its existing General Plan. There would be no policy changes to the Circulation Element, but the City would adopt Transportation Impact Analysis Guidelines defining the methodology for analyzing VMT impacts in Clovis. Under this alternative, the City would not

be making any policy changes in response to SB 743, but would still be required to analyze projects for VMT.

The No Project Alternative would be anticipated to result in slightly higher VMT per capita because there would be no requirement for new projects to implement VMT reduction measures. This alternative is inferior to the proposed Project. The Policy Change Only Alternative would be anticipated to result in approximately the same VMT per capita, although it may be slightly higher. There would also be an inconsistent approach to analysis of VMT. This alternative is inferior to the proposed Project. Similarly, the TIA Guidelines Only Alternative would be anticipated to result in approximately the same VMT per capita, although it may be slightly higher. There would be an inconsistency between future projects in their approach to reducing VMT, because there is no policy directive requiring VMT reduction. This alternative is inferior to the proposed Project.

Although each of these alternatives would be physically feasible, none of them would be as effective in achieving all of the project objectives as the proposed Project. The No Project Alternative would not achieve any of the Project objectives as it would not update City Policy in the Circulation Element and would not establish Transportation Impact Analysis Guidelines. Additionally, both the Policy Change Only Alternative and the TIA Guidelines Only Alternative would not be as responsive to the Project objectives as the proposed Project. The proposed Project more accurately reflects the City's (including business owners and residents) future planning goals for their community. The three alternatives were rejected by the City in favor of the proposed Project.

### **Overriding Considerations**

The City, after balancing the specific economic, legal, social, technological, and other benefits of the proposed Project, including regionwide or statewide environmental benefits, has determined that the unavoidable adverse environmental impacts identified above may be considered acceptable due to the following specific considerations that outweigh the unavoidable, adverse environmental impacts of the proposed Project, in accordance with CEQA Section 21081(b) and State CEQA Guideline Section 15093.

1. Potential fiscal benefits to the City by including a policy to evaluate the feasibility of a VMT mitigation fee program and explore opportunities for establishing an in-lieu mitigation fee to offset VMT impacts from development.
2. Reduction in vehicle miles travelled and associated greenhouse gas emissions by providing one new VMT reduction goal and six new VMT reduction policies to the Circulation Element.
3. Consistency with Complete Streets Act and SB 743.
4. Proposed Circulation Element Update goals and policies that address citywide and neighborhood-specific transportation demand and active transportation strategies.

## Mitigation Monitoring and Reporting Program

This document is the Final Mitigation Monitoring and Reporting Program (FMMRP) for the 2014 Clovis General Plan Circulation Element Update (Project). This FMMRP has been prepared pursuant to Section 21081.6 of the California Public Resources Code, which requires public agencies to “adopt a reporting and monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment.” A FMMRP is required for the proposed Project because the EIR has identified significant adverse impacts, and measures have been identified to mitigate those impacts.

The numbering of the individual mitigation measures follows the numbering sequence as found in the Draft EIR.

### MITIGATION MONITORING AND REPORTING PROGRAM

The FMMRP, as outlined in the following table, describes mitigation timing, monitoring responsibilities, and compliance verification responsibility for all mitigation measures identified in this Final EIR.

The City will be the primary agency responsible for implementing the mitigation measures and will continue to monitor mitigation measures that are required to be implemented during the operation of the proposed Project.

The FMMRP is presented in tabular form on the following pages. The components of the FMMRP are described briefly below:

**Mitigation Measures:** The mitigation measures are taken from the Draft EIR in the same order that they appear in that document.

**Mitigation Timing:** Identifies at which stage of the project mitigation must be completed.

**Monitoring Responsibility:** Identifies the agency that is responsible for mitigation monitoring.

**Compliance Verification:** This is a space that is available for the monitor to date and initial when the monitoring or mitigation implementation took place.





## RESOLUTION 22-\_\_\_\_

**RESOLUTION OF THE CITY COUNCIL OF THE CITY OF CLOVIS TO APPROVE  
GENERAL PLAN AMENDMENT GPA2022-003 TO AMEND THE 2014 CLOVIS GENERAL  
PLAN CIRCULATION ELEMENT TO INCORPORATE VMT POLICIES**

**WHEREAS**, the City of Clovis, 1033 Fifth Street, Clovis CA, 93619, initiated an application for General Plan Amendment (GPA) 2022-003 to amend the 2014 General Plan to incorporate policy changes to the Circulation Element to incorporate provisions related to the vehicle miles traveled (VMT) traffic impact evaluation criterion (the Project); and

**WHEREAS**, the initiation of the Project was the result of SB 743 becoming effective on July 1, 2020, at which time the metric by which transportation impacts are assessed pursuant to the California Environmental Quality Act (CEQA) shifted from a level of service (LOS) based analysis to VMT based analysis; and

**WHEREAS**, as the City developed guidelines for the implementation of SB 743, it became evident that the City's 2014 General Plan Circulation Element needed to be updated to be in alignment with the State's mandates; and

**WHEREAS**, an update to the Circulation Element was prepared, focusing on policy language additions and modifications that are aimed at reducing VMT by way of a variety of planning mechanisms; and

**WHEREAS**, the Planning Commission held a noticed Public Hearing on September 22, 2022 to consider the Project, at which time interested persons were given opportunity to comment on the Project; and

**WHEREAS**, the Planning Commission voted and recommended that the Council approve the Project; and

**WHEREAS**, the Planning Commission's action was forwarded to the City Council for consideration; and

**WHEREAS**, the City Council held a noticed Public Hearing on October 17, 2022 to consider the Planning Commission's recommendations and to consider the Project; and

**WHEREAS**, the City Council has had an opportunity to review and consider the entire Administrative Record relating to the Project, which is on file with the City's Department of Planning and Development Services, and reviewed and considered those portions of the

Administrative Record determined to be necessary to make an informed decision, including, but not necessarily limited to, the staff report, the written materials submitted with the request, and the verbal and written testimony and other evidence presented during the public hearing.

**NOW, THEREFORE, BASED UPON THE ENTIRE RECORD OF THE PROCEEDINGS, THE CITY COUNCIL RESOLVES AND FINDS AS FOLLOWS:**

1. The City Council hereby approves General Plan Amendment 2022-003 as outlined in **Attachment A**.
2. The Project satisfies the required findings for approval of a general plan amendment, as follows:
  - a. The GPA2022-003 is internally consistent with the goals, policies, and actions of the General Plan.
  - b. The GPA2022-003 would not be detrimental to the public interest, health, safety, convenience, or general welfare of the City.
  - c. There is a compelling reason for the amendment, namely, to incorporate policy language into the Circulation Element to reflect the provisions of SB 743.
3. The basis for the findings is detailed in the October 17, 2022 staff report, which is hereby incorporated by reference, the entire Administrative Record, as well as the evidence and comments presented during the public hearing.

\* \* \* \* \*

The foregoing resolution was introduced and adopted at a regular meeting of the City Council of the City of Clovis held on \_\_\_\_\_, 2022, by the following vote, to wit.

AYES:  
NOES:  
ABSENT:  
ABSTAIN:

DATED:

\_\_\_\_\_  
Mayor

\_\_\_\_\_  
City Clerk



## GPA2022-003 Amended Circulation Element Goals & Policies

### DESCRIPTION OF PROPOSED PROJECT

#### FOCUSED UPDATE

---

The City of Clovis is preparing a focused update to its existing General Plan. The proposed Project concentrates on policy changes to the Circulation Element only, and does not change any other Element of the General Plan.

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

#### GOALS AND POLICIES

---

##### **Clovis General Plan**

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

##### CLOVIS GENERAL PLAN GOALS AND POLICIES

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

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

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

- Policy 1.5 **Neighborhood connectivity.** The transportation network shall provide multimodal access between neighborhoods and neighborhood-serving uses (educational, recreational, or neighborhood commercial uses).
- Policy 1.6 **Internal circulation.** New development shall utilize a grid or modified-grid street pattern. Areas designated for residential and mixed-use village developments should feature short block lengths of 200 to 600 feet.
- Policy 1.7 **Narrow streets.** The City may permit curb-to-curb dimensions that are narrower than current standards on local streets to promote pedestrian and bicycle connectivity and enhance safety.
- Policy 1.8 **Network completion.** New development shall complete the extension of stub streets planned to connect to adjacent streets, where appropriate.

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

- Policy 2.1 **Level of service.** The following is the City's level of service (LOS) standards:
- A. Achieve LOS D vehicle traffic operations during the a.m. and p.m. peak hours
  - B. Allow exceptions on a case-by-case basis where lower levels of service would result in other public benefits, such as:
    - i. Preserving agriculture or open space land
    - ii. Preserving the rural/historic character of a neighborhood
    - iii. Preserving or creating a pedestrian-friendly environment in Old Town or mixed-use village districts
    - iv. Avoiding adverse impacts to pedestrians, cyclists, and mass transit riders
    - v. Where right-of-way constraints would make capacity expansion infeasible
- Policy 2.2 **Multimodal LOS.** Monitor the evolution of multimodal level of service (MMLOS) standards. The city may adopt MMLOS standards when appropriate.
- Policy 2.3 **Fair share costs.** New development shall pay its fair share of the cost for circulation improvements in accordance with the city's traffic fee mitigation program.
- Policy 2.4 **Right-of-way dedication.** The city may require right-of-way dedication essential to the circulation system in conjunction with any development or annexation. The City shall request the County of Fresno to apply the same requirements in the Clovis planning area.
- Policy 2.5 **Regional and state roadway funding.** Coordinate with the County of Fresno, City of Fresno, Fresno Council of Governments, and Caltrans to fund roadway improvements adjacent to and within the City's Planning Area.
- Policy 2.6 **Vehicle Miles Traveled.** Development projects shall comply with the City's VMT Transportation Analysis Guidelines and provide the appropriate VMT mitigation measures as determined through the analysis.

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

Policy 2.8 **Partner with local agencies and stakeholders.** Partner with other local and regional agencies and stakeholders to explore VMT mitigation measures at the regional scale.

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

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

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

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

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

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

- Policy 5.1 **Complete street amenities.** Upgrade existing streets and design new streets to include complete street amenities, prioritizing improvements to bicycle and pedestrian connectivity or safety, consistent with the Bicycle Transportation Master Plan and other master plans.
- Policy 5.2 **Development-funded facilities.** Require development to fund and construct facilities as shown in the Active Transportation Plan Bicycle Transportation Plan when facilities are in or adjacent to the development.
- Policy 5.3 **Pathways.** Encourage pathways and other pedestrian amenities in Urban Centers and new development 10 acres or larger.
- Policy 5.4 **Homeowner associations.** The city may require homeowner associations to maintain pathways and other bicycle and pedestrian facilities within the homeowner association area.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**DRAFT  
RESOLUTION 22-\_\_**

**A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF CLOVIS ADOPTING AN  
UPDATE TO THE CLOVIS TRANSPORTATION IMPACT ANALYSIS GUIDELINES TO  
INCORPORATE VMT THRESHOLDS AND IMPLEMENTATION GUIDANCE**

**WHEREAS**, the City of Clovis established and adopted Transportation Impact Analysis (TIA) Guidelines in conjunction with its adoption of the 2014 Clovis General Plan in August of 2014; and

**WHEREAS**, SB 743 became effective on July 1, 2020, resulting in a shift in the metric by which transportation impacts are assessed pursuant to the California Environmental Quality Act (CEQA) from a level of service (LOS) based analysis to vehicle miles traveled (VMT) analysis; and

**WHEREAS**, the City initiated the process to update the City's existing TIA Guidelines to establish thresholds and implementation guidance for VMT analysis; and

**WHEREAS**, the adoption of the TIA Guidelines is allowed by CEQA under Public Resources Code Section 21082 and CEQA Guidelines Section 15022, which specifically authorize public agencies to adopt procedures for implementing provisions of CEQA; and

**WHEREAS**, on July 20, 2020 Interim TIA Guidelines were adopted by the City Council to satisfy the July 1, 2020 compliance deadline; and

**WHEREAS**, Final TIA Guidelines have been completed and made available to the public for review (the Project); and

**WHEREAS**, the Planning Commission held a noticed Public Hearing on September 22, 2022 to consider the Project, at which time interested persons were given opportunity to comment on the Project; and

**WHEREAS**, the Planning Commission voted and recommended that the Council approve the Project; and

**WHEREAS**, the Planning Commission's action was forwarded to the City Council for consideration; and

**WHEREAS**, the City Council held a noticed Public Hearing on October 17, 2022 to consider the Planning Commission's recommendations and to consider the Project; and

**WHEREAS**, the TIA Guidelines are necessary to provide for the orderly and consistent implementation of the General Plan in accordance with CEQA and SB 743; and

**WHEREAS**, the City Council has had an opportunity to review and consider the entire Administrative Record relating to the TIA Guidelines, which is on file with the City's Department of Planning and Development Services, and reviewed and considered those portions of the

Administrative Record determined to be necessary to make an informed decision, including, but not necessarily limited to, the staff report, the written materials submitted with the request, and the verbal and written testimony and other evidence presented during the public hearing.

**NOW, THEREFORE, BASED UPON THE ENTIRE RECORD OF THE PROCEEDINGS, THE CITY COUNCIL RESOLVES AND FINDS AS FOLLOWS:**

1. The updated TIA Guidelines establishing VMT thresholds and implementation guidance are hereby adopted as outlined in Attachment A.

\* \* \* \* \*

The foregoing resolution was introduced and adopted at a regular meeting of the City Council of the City of Clovis held on October 17, 2022 by the following vote, to wit.

AYES:  
NOES:  
ABSENT:  
ABSTAIN:

DATE: October 17, 2022

\_\_\_\_\_  
Mayor

\_\_\_\_\_  
City Clerk



# TRANSPORTATION IMPACT ANALYSIS GUIDELINES

City of Clovis, CA



September 15, 2022

## Table of Contents

1.	Introduction .....	1
1.1.	Overview of Guidelines .....	1
1.2.	Transportation Impact Requirements .....	1
1.2.1.	SB 743 Requirements.....	1
1.2.2.	Local Requirements .....	2
1.3.	Transportation Impact Analysis Reports.....	2
1.3.1.	CEQA Analysis .....	3
1.3.2.	Local Transportation Analysis .....	3
2.	CEQA Analysis Requirements .....	4
2.1.	Land Use Projects .....	4
2.1.1.	Project Screening.....	4
2.1.2.	Significant Impact Thresholds.....	9
2.1.3.	VMT Analysis Methodology .....	11
2.1.4.	Redevelopment Projects.....	12
2.1.5.	Land Use Plans.....	12
2.1.6.	Cumulative Impacts .....	13
2.1.7.	Mitigation .....	13
2.2.	Transportation Projects.....	15
2.2.1.	Determining Need for Detailed VMT Analysis.....	15
2.2.2.	Thresholds for Transportation Projects .....	16
2.2.3.	VMT Analysis Methodology and Tools.....	16
2.2.4.	Mitigation for Transportation Projects .....	16
3.	Local Transportation Analysis.....	18
3.1.	Purpose .....	18
3.1.1.	Thresholds for LTA Preparation .....	18
3.2.	Study Area .....	19
3.2.1.	Coordination with Caltrans.....	19
3.2.2.	Coordination with Other Agencies.....	19
3.3.	Levels of Service .....	20
3.3.1.	Level of Service Methodologies .....	20

- 3.4. Traffic Analysis Scenarios ..... 22
  - 3.4.1. Cumulative Traffic Volumes ..... 23
- 3.5. Traffic Counts ..... 24
- 3.6. Trip Generation ..... 24
- 3.7. Trip Distribution ..... 25
- 3.8. Approved and Pending Projects ..... 26
- 3.9. Site Access and Circulation ..... 26
- 3.10. Queuing at Study Intersections ..... 27
- 3.11. Traffic Operations Thresholds ..... 27
- 3.12. Analysis Discussion ..... 28
- 4. Level of Environmental Review ..... 29
  - 4.1. General Plan Circulation Element Update ..... 29
  - 4.2. Environmental Review Scenarios..... 29
    - 4.2.1. Project Has Non-Transportation Environmental Impacts ..... 29
    - 4.2.2. Project Has Transportation Impacts Only ..... 30

Attachment A: High Quality Transit Areas Map

Attachment B: VMT Screening Maps

Attachment C: VMT-Reducing Transportation Projects

Attachment D: Local Transportation Analysis Report Format

Attachment E: General Plan 2042 VMT Maps

## 1. INTRODUCTION

The Transportation Impact Analysis Guidelines document provides guidance to City of Clovis (City) staff, applicants, and consultants on the requirements to evaluate transportation impacts for projects in the City for the purpose of determining impacts under the California Environmental Quality Act (CEQA). The Transportation Impact Analysis Guidelines are intended to:

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

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

### 1.1. OVERVIEW OF GUIDELINES

**Section 1: Introduction** summarizes the requirements for transportation analysis.

**Section 2: CEQA Analysis Requirements** describes the analysis to meet State of California guidelines, in particular analysis of vehicle-miles of travel (VMT).

**Section 3: Local Transportation Analysis** lists the requirements for transportation evaluation relative to City of Clovis policies.

Section 4: Level of Environmental Review summarizes the environmental documentation that may be appropriate for various types of projects.

### 1.2. TRANSPORTATION IMPACT REQUIREMENTS

The Transportation Impact Analysis Guidelines specifically address the requirements of California Senate Bill 743 (SB 743) which mandates specific types of CEQA analysis of transportation projects, effective July 1, 2020.

#### 1.2.1. SB 743 Requirements

Prior to implementation of SB 743, CEQA transportation analyses of individual projects typically determined impacts on the circulation system in terms of roadway delay (i.e., congestion) and/or capacity usage at specific locations, such as street intersections or freeway segments. Senate Bill 743, signed into law in September 2013, requires changes to the guidelines for CEQA transportation analysis. The changes include the elimination of auto delay, level of service (LOS), and other similar measures of vehicular capacity or traffic congestion as a basis for determining transportation

impacts. The purpose of SB 743 is to promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses.

Under SB 743, a project's effect on automobile delay shall not constitute a significant environmental impact under CEQA. Therefore, LOS and other similar vehicle delay or capacity metrics may no longer serve as transportation impact metrics for CEQA analysis. The California Office of Planning and Research (OPR) updated the CEQA Guidelines and provided a technical advisory (December 2018), which recommends vehicle miles traveled (VMT) as the most appropriate measure of transportation impacts under CEQA. The California Natural Resources Agency certified and adopted the CEQA Guidelines including the Guidelines section implementing SB 743. The changes have been approved by the Office of the Administrative Law and took effect on July 1, 2020.

### 1.2.2. Local Requirements

It shall be noted that revisions to CEQA transportation analysis requirements do not preclude the application of local general plan policies, municipal and zoning codes, conditions of approval, or any other planning requirements through a city's planning approval process to ensure adequate operation of the transportation system in terms of transportation congestion measures related to vehicular delay and roadway capacity. As such, the City of Clovis continues to apply congestion-related transportation impact analysis and conditions or requirements for land development projects through planning approval processes outside of the CEQA Guidelines in order to continue implementation of Clovis General Plan policies.

The City's adopted 2014 General Plan Circulation Element includes a LOS standard. In order to ensure that a project is consistent with the General Plan policy, a LOS analysis may be required at the request of the City Engineer to determine necessary roadway infrastructure improvements and capacity. Any improvements necessary to ensure LOS standards are met may be required as part of the project entitlement. These requirements are discussed in Section 3, Local Transportation Analysis.

## 1.3. TRANSPORTATION IMPACT ANALYSIS REPORTS

This document provides guidance for the two types of analysis that normally comprise a Transportation Impact Analysis (TIA) report:

1. CEQA Analysis
2. Local Transportation Analysis

Not all projects will require all components of a CEQA analysis and a local transportation analysis. For example, a project could meet the screening criteria for being located in a high-quality transit area and be exempt from the preparation of a detailed CEQA VMT analysis. Such a project may only be required to provide a local transportation analysis. Conversely, a project may require a VMT

analysis, but not necessarily require a local transportation analysis. Thus, the final scope of the Transportation Impact Analysis would need to be determined by the City.

### 1.3.1. CEQA Analysis

A CEQA analysis of transportation impacts consists of evaluation measures including conflicts with circulation policies, VMT, hazards, and emergency access. The quantitative methodology, significance thresholds, and mitigation measures for conducting the transportation analysis in accordance with the requirements of SB 743 are primarily based on VMT metrics. The CEQA analysis is part of the environmental review process and must meet CEQA requirements.

### 1.3.2. Local Transportation Analysis

The City can require that local non-CEQA analysis address traffic operations, safety issues and needed project design features related to a proposed land use project, as well as analyze site access and internal circulation. The local transportation analysis may be used to assess transportation impacts in relation to the City's policies in the General Plan and other planning documents.

## 2. CEQA ANALYSIS REQUIREMENTS

This section discusses the requirements for conducting analyses for projects under environmental review, consistent with requirements from SB 743. Under CEQA, a lead agency has the authority to determine its own significance thresholds and methodologies for technical analysis, taking into account its own development patterns, policy goals and context. Lead agencies can make their own specific decisions regarding methodology and thresholds, presuming their choices are supported by substantial evidence.

The CEQA Appendix G Environmental Checklist Form identifies the following four impact types for transportation:

- a) Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?
- b) Would the project conflict with or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b) (requirement to use VMT)?
- c) Would the project substantially increase hazards due to a geometric feature or incompatible uses?
- d) Would the project result in inadequate emergency access?

Consistent with State CEQA Guidelines section 15064.3, the City of Clovis has adopted thresholds of significance to determine when a project will have a significant transportation impact based on VMT. The City has developed screening criteria to streamline the analysis for projects that meet certain criteria, referred to as Project Screening, as further described below in Section 2.1.1.

### 2.1. LAND USE PROJECTS

This section provides information for analyzing individual land use projects, including the process to aid in deciding if a detailed VMT analysis is needed for a land use project. Figure 1 presents a flow chart depicting how a land use project would be analyzed under VMT-based metrics.

#### 2.1.1. Project Screening

A project will require a detailed VMT analysis unless it meets at least one of the City's five screening criteria:

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

Figure 1: Land Use Projects VMT Analysis

**LAND USE PROJECTS  
VMT ANALYSIS FLOW CHART**

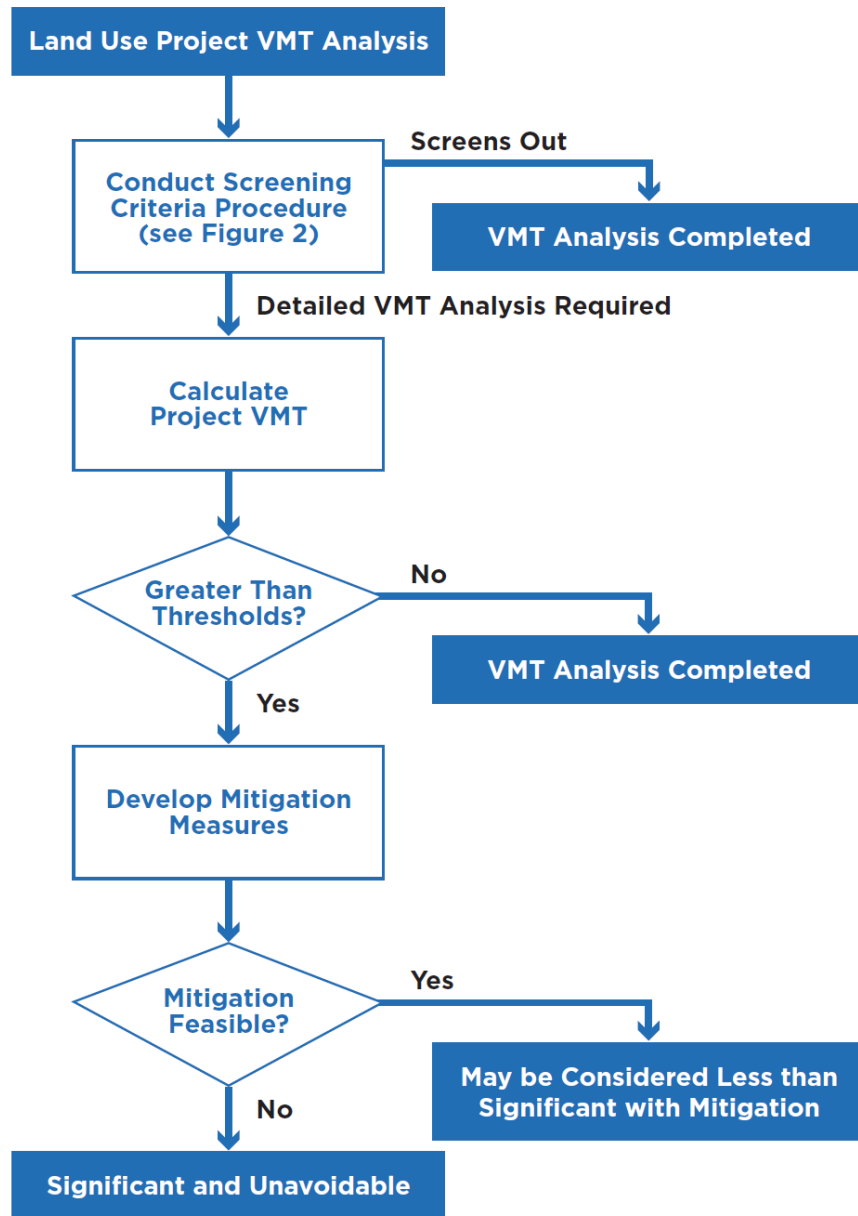
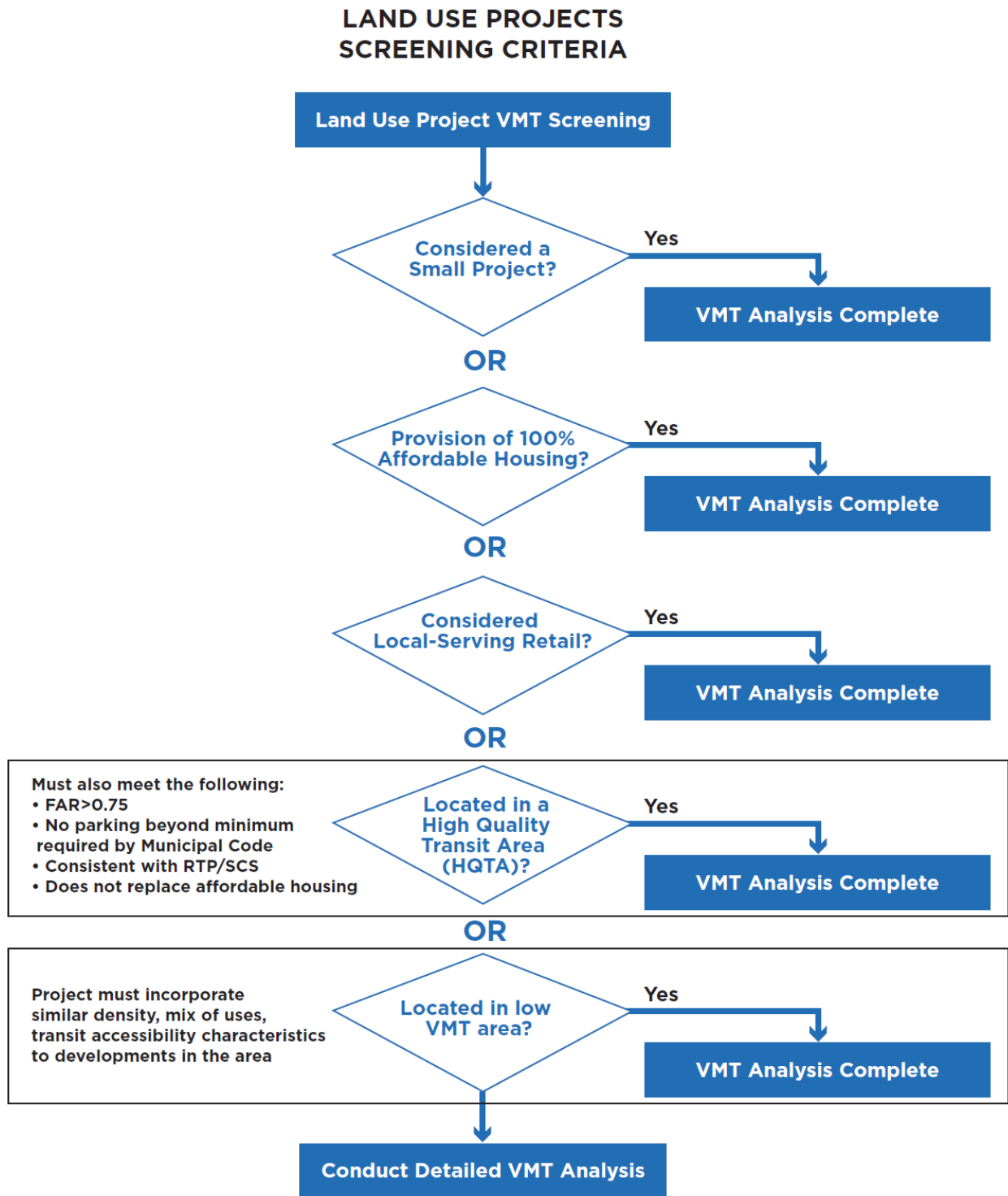


Figure 2 presents a chart depicting how a land use project would be analyzed under the proposed screening criteria. A project that meets at least one of the screening criteria could have a less-than-significant VMT impact due to project or location characteristics.



Figure 2: Land Use Projects Screening Criteria Flow Chart



*2.1.1.1. Small Projects*

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

**Table 1: Sample Small Projects (less than 500 daily trips)**

Land Use Type	Number of Units/ Square Feet
Single Family Residential	53 Dwelling Units
Townhome/Attached Residential	68 Dwelling Units
Retail	13,250 SF
Light Industrial	100,800 SF

Note: calculated trip rates from the ITE *Trip Generation Manual*, 10<sup>th</sup> Edition.

*2.1.1.2. Affordable Housing*

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

*2.1.1.3. Local-Serving Retail and Public Facilities*

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

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

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

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

#### *2.1.1.4. High-Quality Transit Area (HQT)*

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

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

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

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

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

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

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

---

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

#### 2.1.1.6. Consistency with RTP/SCS

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

#### 2.1.2. Significant Impact Thresholds

For projects which do not meet any of the screening criteria, the City of Clovis has adopted VMT thresholds for land use development based on a review of long-range plans and policies for the City and for the metropolitan planning organization for the region, Fresno COG. Fresno COG has set a goal to reduce greenhouse gas (GHG) emissions by 13 percent per capita by 2035 as a target for the Fresno region<sup>4</sup>. The intent of SB 743 is to bring CEQA transportation analyses into closer alignment with other statewide policies regarding GHG, complete streets, and smart growth. Therefore, using a threshold of 13 percent below average VMT for residential and office projects is consistent with established regional GHG emission goals.

The OPR technical advisory recommends comparing a project's estimated VMT per capita or VMT per employee to average values on a regional or citywide basis. For retail projects, total VMT within the area affected by the project is measured.

The significance thresholds and specific VMT metrics used to indicate a significant transportation impact are described by land use type in Table 2 .

---

<sup>4</sup> SB 375 Greenhouse Emission Reduction Target for the Fresno County Region, Fresno Council of Governments, April 25, 2017.

**Table 2: Impact Thresholds by Land Use Type**

Land Use Type	Impact Threshold
Residential	<p>A proposed project exceeding a level of 13 percent below existing average VMT per capita in Fresno County.</p> <p>Regional Average: 16.1 VMT/capita Impact Threshold: 14.1 VMT/capita</p>
Office	<p>A proposed project exceeding a level of 13 percent below existing average VMT per employee in Fresno County.</p> <p>Regional Average: 25.6 VMT/employee Impact Threshold: 22.3 VMT/employee</p>
Retail	<p>A net increase in total VMT. The total VMT for the region without and with the project is calculated. The difference between the two scenarios is the net change in total VMT that is attributable to the project.</p>
Other land uses	<p>The City will make a determination of the applicable thresholds on a case-by-case basis based on the land use type, project description, and setting. Research and development, medical offices, assisted living, and industrial projects may be evaluated similar to office projects using the VMT per employee metric. Projects such as religious institutions, regional parks, hotels, private schools and medical offices may be evaluated using the net VMT criteria similar to retail projects.</p>
Mixed-Use Projects	<p>Evaluate each component of a mixed-use project independently and apply the significance threshold for each land use type. Alternatively, the evaluation would apply only to the project’s dominant use.</p>

### 2.1.3. VMT Analysis Methodology

Projects that do not meet the screening criteria must include a detailed evaluation of the VMT generated by the project.

#### 2.1.3.1. Regional Average VMT

Regional average VMT per capita and VMT per employee values are determined using the Fresno COG travel model. The travel model is a set of mathematical procedures and equations that represent the variety of transportation choices that people make, and how those choices result in trips on the transportation network. The Fresno COG travel model is an activity-based model that simulates the County's population, based on detailed Census data, and models the daily activity patterns of each simulated individual along with resulting travel demand. The OPR guidelines recommend using an activity or tour-based approach for VMT whenever possible.

The daily activity patterns in the travel model are based on a statistical analysis of a household travel survey, where a representative sample of households were asked to track all daily activities and trips by all members of their household. A simulated travel tour might consist of, for example, travel from the home to the gym to work to supermarket to home in a typical weekday. The travel model was calibrated to these surveyed travel patterns, and also validated by its ability to replicate counted traffic volumes, transit ridership, and total Fresno County VMT from the Highway Performance Measurement System (HPMS) which is based on traffic counts.

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

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

#### 2.1.3.2. VMT per Capita or per Employee

For residential or employment land uses where VMT per capita or VMT per employee are used to determine impacts, the following analysis methods are available:

- The VMT per capita or VMT per employee may be looked up using the latest screening maps (Attachment B) and the TAZ (or TAZs) containing the project site.
- If the value for the TAZ is zero or significantly different compared to the values in surrounding TAZs due to a lack of land use data in the existing condition for the project

- TAZ, the City may allow the VMT per capita or VMT per employee to be based on an average of surrounding adjacent TAZs.
- If a proposed project affects the balance of residential and non-residential land uses in an area and is a relatively large project, it is recommended that the Fresno COG model be rerun to include the proposed project, and that the VMT per capita and VMT per employee be recalculated.

#### 2.1.3.3. Exclusion of Truck VMT

It shall be noted that SB 743 does not apply to goods movement (i.e., trucks). Section 15064.3 of the CEQA Guidelines states that VMT for transportation impacts refers to "... the amount and distance of automobile travel...". Therefore, the VMT associated with trucks and the movement of goods is not required to be analyzed and mitigated for the evaluation of transportation impacts under CEQA. Projects that generate a substantial amount of truck traffic also generate automobile trips, and project-related automobile trips would be subject to VMT analysis and mitigation. The VMT for all vehicles, including heavy trucks related to a project, will still be calculated as input for air quality, GHG, noise and energy impact analyses to be evaluated in non-transportation parts of the environmental analysis. The local transportation analysis requires an evaluation of truck traffic in terms of roadway and intersection operations, as discussed in Section 3.

#### 2.1.4. Redevelopment Projects

If a redevelopment project replaces active land uses and results in a net decrease in overall VMT, it may be presumed that the project would result in a less-than-significant impact.

If a project replaces existing active uses and leads to a net overall increase in VMT compared to the previous uses, then the thresholds for the new land uses should apply. If net VMT increases, then the appropriate VMT metrics and thresholds should be applied. For example, if a residential project replaces an office use resulting in a net increase in VMT, then the project's VMT per capita should be compared with the thresholds for residential projects. If the project is a mixed-use project, then the recommended approach for analyzing mixed-use projects should be applied to analyze each individual use.

#### 2.1.5. Land Use Plans

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

### 2.1.6. Cumulative Impacts

Per Section 15064 (h) (1) of the CEQA code, “when assessing whether a cumulative effect requires an Environmental Impact Report (EIR), the lead agency shall consider whether the cumulative impact is significant and whether the effects of the project are cumulatively considerable.”

Generally, an analysis of cumulative impacts falls under two categories:

1. VMT per capita or per employee
2. Total VMT

These are described below.

#### 2.1.6.1. VMT per Capita or per Employee

For land uses evaluated under an efficiency metric (VMT per capita for residential or VMT per employee for office/employment), if a project falls below the threshold, it would also result in less-than-significant cumulative impacts. In other words, a project that falls below an efficiency-based threshold would have no cumulative impact distinct from the project impact.

#### 2.1.6.2. Total VMT

For land uses evaluated using total VMT (e.g., retail, hotels, etc.), when absolute VMT metrics (such as total VMT recommended for retail and transportation projects) are used, a cumulative VMT impact analysis may be appropriate. Projects must demonstrate consistency with the City of Clovis General Plan to address cumulative impacts. A determination for consistency with the General Plan or RTP/SCS would be made by the City Engineer and based on factors such as density, design and consistency with the City’s General Plan goals and policies. Inconsistencies may be identified if the proposed land use quantities are beyond the designation for the project site in the General Plan or RTP/SCS, in which case the project may result in higher VMT compared to the applicable plan.

If a project is consistent with the General Plan or RTP/SCS, it will be considered as part of the cumulative condition to meet the General Plan’s long-range transportation goals, and therefore will result in a less-than-significant cumulative impact. If a project is not consistent with the General Plan, a cumulative impact analysis will be required to determine if the project would result in a net increase in VMT.

### 2.1.7. Mitigation

If a project would result in significant impacts, CEQA requires feasible mitigation measures to be implemented to reduce or mitigate an impact. Mitigation includes<sup>5</sup>:

- (a) Avoiding the impact altogether by not taking a certain action or parts of an action

---

<sup>5</sup> According to CEQA code Section 15370



- (b) Minimizing impacts by limiting the degree or magnitude of the action and its implementation
- (c) Rectifying the impact by repairing, rehabilitating, or restoring the impacted environment
- (d) Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action
- (e) Compensating for the impact by replacing or providing substitute resources or environments, including through permanent protection of such resources in the form of conservation easements

For VMT impacts, a combination of measures from several VMT reduction strategies may be implemented: project characteristics, multimodal improvements, parking, and Transportation Demand Management (TDM). VMT is reduced by implementing strategies that reduce the number of automobile trips generated by the project, shift more trips from automobile to non-automobile modes, and/or reduce the distances that people drive. Generally, these reductions can best be achieved by the implementation of TDM strategies.

TDM strategies are designed to change travel behavior in order to reduce the demand for vehicle travel and increase the overall efficiency of a local or regional transportation system. This is accomplished by encouraging mode shifts away from the Single Occupant Vehicle (SOV) and auto trips away from peak periods. TDM strategies typically involve some form of incentives for employers and residents in order to reduce driving and encourage transit, walking, biking, and carpooling. These incentives can include, but are not limited to, supplying transit passes, rideshare programs, parking cash out, and guaranteed ride home programs. The implementation of TDM measures outcomes include increased transit use and non-motorized travel, reduced VMT, reduced roadway congestion, and reduced parking demand.

Measures to reduce VMT have been documented by several sources. Sources most commonly referenced include the California Air Resources Board (CARB) list of transportation and land use strategies for reducing greenhouse gas emissions;<sup>6</sup> the California Pollution Control Officers Association (CAPCOA) report on quantifying greenhouse gas mitigation measures;<sup>7</sup> and the San Diego Association of Governments (SANDAG) Mobility Management VMT Reduction Calculator Tool – Design Document<sup>8</sup>. The City recommends the use of these sources to select and apply mitigation measures and appropriate VMT reductions. The project applicant will be required to provide

---

<sup>6</sup> <https://ww3.arb.ca.gov/cc/sb375/policies/policies.htm>

<sup>7</sup> California Pollution Control Officers Association, Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity, 2021.  
[https://www.airquality.org/ClimateChange/Documents/Final%20Handbook\\_AB434.pdf](https://www.airquality.org/ClimateChange/Documents/Final%20Handbook_AB434.pdf)

<sup>8</sup> [https://www.icommutesd.com/docs/default-source/planning/vmt-reduction-calculator-tool\\_final.xlsx?sfvrsn=4b21b67b\\_4](https://www.icommutesd.com/docs/default-source/planning/vmt-reduction-calculator-tool_final.xlsx?sfvrsn=4b21b67b_4)

evidence for identifying specific values for mitigations to demonstrate the quantification in reduction of VMT to a level that would be less than significant.

Projects for which impacts are determined to be significant are required to propose a list of VMT reduction measures and document the associated percentage of VMT reduction supported by substantial evidence. Project VMT is calculated by applying the percentage in reduction. Project VMT is then compared to the threshold of significance to evaluate the project's CEQA transportation impact. The City will review and approve the proposed mitigation and the calculated percentage in VMT reduction.

VMT mitigation fees, mitigation banks, and mitigation exchange programs are potential future methods for handling mitigation. Cities have been exploring the establishment of programs such as mitigation banking and VMT exchanges. VMT exchange banks allow program-level mitigation to take place for projects located in high-VMT areas where mitigation at the project level alone may not be effective. A considerable amount of effort is needed to set up these types of fee programs, which are implemented in advance and independent of the environmental review for a specific land development project. As a first step, the City will need to identify mitigation strategies that are feasible for the City or individual projects to implement. This can include determining the physical feasibility of infrastructure projects or determining the implementation feasibility of programs that would contribute to development of regional pedestrian, bicycle/scooter, and transit projects and possibly TDM actions aimed at changing travel behavior.

## 2.2. TRANSPORTATION PROJECTS

This section provides information for analyzing transportation projects on roads within the City's jurisdiction.

### 2.2.1. Determining Need for Detailed VMT Analysis

The City of Clovis requires an analysis of transportation projects if they are expected to increase VMT, primarily projects that encourage the use of single-occupancy automobile such as the addition of through travel lanes. However, transportation projects that have already been specifically analyzed in a citywide plan (such as a General Plan update) may be exempt from a detailed VMT analysis. This exemption may be granted if the necessary VMT analysis and potential mitigations have already been calculated and identified at the plan level.

Conversely, projects that would likely not lead to an increase in vehicle travel and which promote use of transit and active transportation, should not require a VMT analysis. Project types that would likely not lead to a substantial or measurable increase in vehicle travel and generally should not require a VMT analysis include:

- road rehabilitation
- safety projects
- auxiliary lanes less than one mile in length

- turning lanes
- conversion to managed or transit lanes
- road diets
- removal or relocation of parking spaces
- addition of non-motorized, transit, and active transportation facilities

A full list is provided in Attachment C.

This approach is consistent with the intent of SB 743 in that it streamlines VMT-reducing projects and thoroughly assesses and mitigates, as appropriate, projects that have the potential to increase VMT.

### 2.2.2. Thresholds for Transportation Projects

Transportation projects that have already been included and evaluated in the General Plan or the RTP/SCS are presumed to have a less-than-significant impact.

For projects that have not been included in the General Plan or RTP/SCS or are modifications and replacements, any growth in VMT attributable to the transportation project could result in a significant impact. For example, a transportation project that replaces a project included in the General Plan and would generate less VMT compared to the project included in the General Plan would have a less than significant impact. Projects not included in the General Plan or RTP/SCS would have a significant impact if they cause a net increase in VMT.

### 2.2.3. VMT Analysis Methodology and Tools

For transportation projects (e.g., those that increase vehicular throughput or are not included in a citywide plan) that require a detailed VMT analysis, the City should require analysis using the most current travel demand model (i.e., Fresno COG model) to estimate changes to citywide VMT due to rerouted trips. To capture long-term effects, an induced demand assessment using the following formula should be required:

$$[\% \text{ increase in lane miles}] \times [\text{existing VMT}] \times [\text{elasticity}] = [\text{VMT resulting from the project}]$$

The City requires total VMT in the city as the appropriate VMT metric, with the impact threshold being any increase in total VMT. The analysis shall be performed for the long-range horizon year, normally 20 years from project completion. This approach would discourage induced demand impacts by requiring that a baseline level of VMT in the city not be exceeded.

### 2.2.4. Mitigation for Transportation Projects

Mitigation measures for transportation projects generally seek to reduce VMT by discouraging single-passenger automobile travel or through funding TDM measures. The following potential mitigation measures for transportation projects are listed as examples for consideration:

- Tolling new lanes to encourage carpooling and fund transit improvements
- Converting existing general-purpose lanes to HOV or HOT lanes
- Implementing or funding off-site travel demand management
- Implementing Intelligent Transportation Systems (ITS) strategies to improve passenger throughput on existing lanes

The City may pursue other mitigation measures supported by substantial evidence.

## 3. LOCAL TRANSPORTATION ANALYSIS

### 3.1. PURPOSE

A local transportation analysis (LTA) may be required for land use projects, in addition to the CEQA analysis, to evaluate the effects of a development project on the circulation network, primarily on local access and circulation in the proximity of a project site. The LTA ensures that the project provides safe connections for cyclists, pedestrians, and transit users. This analysis is required to address operational and safety potential issues for all transportation modes, and to identify improvements needed with project implementation and consistent with City policies.

These guidelines are provided to establish general procedures and requirements for the preparation of LTAs associated with development within the city of Clovis. The City recognizes that every development project and analysis context is unique. Therefore, emphasis is placed on the term “guidelines,” and not every aspect of the guideline is necessarily applicable to all projects. These guidelines are intended as a checklist for analysis preparers to ensure common analysis items are not overlooked. They are not intended to be prescriptive to the point of eliminating professional judgment.

#### 3.1.1. Thresholds for LTA Preparation

Unless waived by the City Engineer, an LTA will be required by the City to adequately assess the impacts of development projects on the existing and/or planned street system when the following thresholds are met:

1. When project-generated traffic is expected to be greater than 100 vehicle trips during any peak hour
2. When a project includes a General Plan Amendment (GPA) which changes the use to a designation that has a potential to generate a higher number of vehicle trips than the existing, or originally planned land use designation
3. When the project traffic will substantially affect an intersection or roadway segment already identified as operating at an unacceptable level of service
4. When the project will substantially change the offsite transportation system or connection to it, as determined by the City Engineer

An LTA requires updating when two or more years with no activity have passed since the preparation of the analysis. After two years with no activity, an LTA is considered antiquated and irrelevant. For cases in which a master LTA was prepared for a large development, the specific phases will generally not require supplemental analyses if the master LTA analyzed the large development in phases and the specific phases are consistent with the master LTA.

### 3.2. STUDY AREA

The intersections and roadway segments to be covered by the LTA will be determined on a case-by-case basis and shall be sufficient in size to include existing and planned streets and intersections that may be impacted by the proposed development. The scope of the LTA, including the study area, proposed trip distribution, and trip generation, shall be reviewed and approved by the Traffic Engineering Manager or designee prior to preparation of the study.

The following guidelines determine the extents of the study area for local transportation analysis:

- Pedestrian, bicycle and transit facilities within a half-mile distance from the project site boundary
- All intersections of major streets that would provide direct access to the project
- All signalized intersections within one-half mile of the project site boundary where the project would add 50 or more peak hour trips, and signalized intersections beyond one-half mile where the project would add 100 or more peak hour trips
- All unsignalized intersections within a half-mile of the project site boundary where the project would add more than 50 peak hour trips

Local transportation analyses shall provide sufficient detail regarding existing pedestrian, bicycle, and transit facilities. This could include identification of deficient facilities, existing and planned bicycle facilities, and existing and planned transit routes and facilities.

#### 3.2.1. Coordination with Caltrans

The LTA and/or City staff shall consult with the State of California Department of Transportation (Caltrans) to determine traffic impacts on Caltrans' State facilities. This consultation should include a request to Caltrans for their concurrence with the scope of analysis for Caltrans' State facilities, or a recommendation from Caltrans for specific modifications to the scope. This analysis must follow the most current Caltrans guidance to analyze transportation impacts from development projects on the State highway system. The consultation should also include a review of recommendations to reduce any impacts to Caltrans' State facilities.

#### 3.2.2. Coordination with Other Agencies

The LTA preparer and/or City staff shall consult with the City of Fresno and/or Fresno County to determine the levels of significance with regard to traffic impacts on Fresno or County roadway facilities. Correspondence with the neighboring agencies shall be provided to the City Engineering Department.

If a consultant is performing work in an adjacent agency and is analyzing circulation and transportation facilities and infrastructure within one mile of the City of Clovis sphere of influence, City of Clovis City Engineer should be contacted for review of the scope of work, as well as receive a completed document for comment.

### 3.3. LEVELS OF SERVICE

All city intersections and roadway segments shall operate at a LOS D or better under the near-term conditions, unless a finding of overriding consideration was adopted in the General Plan EIR. Under long-term conditions, all city intersections and roadway segments shall operate at a LOS D or better, except for the roadway segments adopted in the General Plan EIR to operate at LOS E or F. Exceptions to this standard may be allowed on a case-by-case basis where lower levels of service would result in other public benefits, such as:

- Preserving agriculture or open space land
- Preserving the rural/historic character of a neighborhood
- Preserving or creating a pedestrian-friendly environment in Old Town or mixed-use village districts
- Avoiding adverse impacts to pedestrians, cyclists, and transit riders
- Where right-of-way constraints would make capacity expansion infeasible

#### 3.3.1. Level of Service Methodologies

The LOS shall be based on average delay for signalized and unsignalized intersections and service volume tables (such as those prepared by the Florida Department of Transportation) for roadway segments. Average delay for study intersections shall be summarized in a table. The traffic analysis methodologies for the facility types indicated below will be accepted without prior consultation:

##### 3.3.1.1. Signalized Intersections

Analysis of signalized intersections shall use the most current edition of the Highway Capacity Manual (HCM) using Synchro, Vistro, Highway Capacity Software (HCS), or other software approved by the City Traffic Engineer.

The procedures in the Highway Capacity Manual do not explicitly address operations of closely spaced signalized intersections. Under such conditions, several unique characteristics must be considered, including spill-back potential from the downstream intersection to the upstream intersection, effects of downstream queues on upstream saturation flow rate, and unusual platoon dispersion or compression between intersections. An example of such closely spaced operations is signalized ramp terminals at urban interchanges. Queue intersections between closely spaced intersections may seriously distort the procedures in the HCM. In this case, simulation of the study area may be necessary, as determined by the City Engineer.

##### 3.3.1.2. Unsignalized Intersections

Analysis of unsignalized intersections shall use the most current edition of the HCM and Manual on Uniform Traffic Control Devices for Streets and Highways (MUTCD) using Synchro, Vistro, HCS, or other software approved by the City Engineer.

### 3.3.1.3. Signal Warrants

Analysis of signal warrants shall apply the current MUTCD Signal Warrants.

### 3.3.1.4. Roundabouts

The SIDRA software may be used for the analysis of individual roundabouts, However, the SIDRA software does not account for the chaining of two roundabouts and the queues associated between the roundabouts. Simulation with proper assumptions is the only way to ensure this analysis is performed correctly. The consultant shall discuss methodology with City staff prior to performing the work for roundabout analysis. The consultant will need a conceptual design of the roundabout for the analysis. The analysis should reflect United States and Clovis/Fresno driver behavior.

### 3.3.1.5. LOS Analysis Default Values

While the City of Clovis does not officially advocate the use of any software, Synchro is the software used by City staff. The analysis shall use the latest published version of the HCM. The LOS analysis at study intersections shall be conducted using the following default values as applicable:

- Use of signal timing plans, if available. If not available, then:
  - Minimum split time for protected left-turn phase shall not be less than 12 seconds.
  - Minimum pedestrian times should be satisfied on all phases with pedestrian phase for signals modeled as coordinated signals.
  - For study intersections modeled as actuated uncoordinated signals, the intersections shall be evaluated with at least 10 pedestrian calls per hour in the Existing plus Project and Long-Range conditions, if pedestrian projections are not available.
  - If existing cycle lengths are available, they should be utilized. In instances where existing cycle lengths are not available, LOS calculations should be conducted using the natural cycle lengths. The cycle lengths should remain constant for comparison purposes, unless the project is changing the character of the intersection and it is noted in the report.
  - In instances where signalized intersections are coordinated, coordinated cycle lengths should be determined based on the natural cycle lengths of the coordinated signals and shall be used for evaluation purposes.
  - Minimum All-Red time(s) shall equal 1.0 seconds (2.0 seconds when dual left turn lanes are used).
  - Minimum Yellow time shall equal 3.5 seconds, or greater based on the approach speeds (3.0 seconds for left turn phases).
- Where existing traffic volumes are collected and peak hour factors are available, then LOS calculations for Existing Condition scenarios and the Near-Term scenarios should use available counted peak hour factors, provided that the traffic counts are included in



the Appendix. For all Cumulative scenarios and Existing Conditions where peak hour factors are not available, default factors per the HCM shall be used and shall be consistent throughout the Cumulative scenarios and peak hours.

- Existing storage lengths shall be entered as input data.
- All assumptions and defaults used shall have proper citation and justification for their use in the LTA.

### 3.4. TRAFFIC ANALYSIS SCENARIOS

The following scenarios shall be included in the LTA:

- A. For projects requiring a General Plan Amendment, intersection LOS analysis and calculation worksheets, as well as figures showing turning volumes and lane configurations, shall be included in the report for the following traffic scenarios:
  - a) Existing Conditions – Current year traffic volumes and peak hour LOS analysis
  - b) Existing plus Project Conditions – Trip generation and trip distribution added to the previous scenario and LOS analysis
  - c) Near-Term Analysis (Existing plus Approved and Pending Projects plus Proposed Project Conditions) – Trip generation and trip distribution for Approved and Pending projects added to the previous scenario and LOS analysis
  - d) Cumulative Long-Range Conditions without Project – Long-Range conditions (20 years from existing conditions and/or consistent with the horizon year available from the Fresno COG model)
  - e) Cumulative Long-Range Conditions with Project – Project traffic added to the previous scenario
  - f) If any phasing is to take place, then such phasing should be studied at its appropriate build out year in addition to the above scenarios.
  - g) Trip traces to affected Caltrans freeway interchanges shall be performed for the current General Plan land use and the land use proposed per the GPA.
- B. For projects with planned land uses consistent with the General Plan, intersection LOS analysis and calculation worksheets, as well as figures showing turning volumes, shall be included in the report for the following traffic scenarios:
  - a) Existing Conditions – Current year traffic volumes and peak hour LOS analysis
  - b) Existing plus Project Conditions – Trip generation and trip distribution added to the previous scenario and LOS analysis
  - c) Near-Term Analysis (Existing plus Approved and Pending Projects plus Proposed Project Conditions) – Trip generation and trip distribution for Approved and Pending projects added to the previous scenario and LOS analysis
  - d) If any phasing is to take place, then such phasing should be studied at its appropriate build out year in addition to the above scenarios.

- e) Trip distribution to affected Caltrans freeway interchanges shall be performed for the proposed project.

"No Project" scenarios do not require analyses for improvements. For the proposed project, no physical improvements shall be assumed to be implemented unless there is a Capital Improvement Project already identified and fully funded. If the improvement is identified in an impact fee program and the improvement is fully funded, then that improvement can be assumed under Cumulative Analysis scenarios. However, the "project" may be conditioned with constructing the assumed improvement.

### 3.4.1. Cumulative Traffic Volumes

Cumulative Long-Range Conditions traffic volumes shall be projected based on the method documented by the Fresno COG model steering committee using procedures such as the increment method. The methodology for developing the forecasts shall be clearly documented in the report. Information from Fresno COG model runs shall be included in the Appendix.

The following scenarios shall be requested from the Fresno COG model to perform this forecasting correctly:

- Current Year Model Run (Existing Conditions Model),
- Cumulative Long-Range No Project Model Run (Cumulative Conditions Model),
- Cumulative Long-Range Project SelectZone FRATAR
- <sup>9</sup> Model Run, and
- Near-Term Opening Year Model Run, if necessary.

In order to correctly use the model to forecast Cumulative volumes, consultants should contact Fresno COG staff and/or review the Fresno COG webpage.

Consultants should work with Fresno COG staff or approved consultants to prepare a model scope of work request for a basic LTA, and if the analysis is more involved, it may need additional information. The minimum will include reviewing the existing land uses assumed in the model; potentially splitting the TAZs as necessary to more accurately reflect driveways and land uses; and reviewing roadway circulation in the model near the project site. If the consultant is not familiar with the Fresno COG model and the assumptions and information that went into validating the model, the consultant is encouraged to schedule time with the Fresno COG staff to become an expert on the model as the information provided from the model is the basis for the analysis. The consultant will be accountable for the information provided by Fresno COG.

---

<sup>9</sup> FRATAR factoring method to ensure that the model represents Project daily and peak hour trips consistent with independent trip generation estimates.

The consultant should also provide, in the Appendix, the request for modeling services and the response provided by Fresno COG or modeling consultant when the data is returned. An email response from staff is sufficient.

All assumptions shall have proper citation and justification for their use in the LTA.

### 3.5. TRAFFIC COUNTS

Traffic counts should be collected and included in the Appendix. Available existing counts can be used if they are less than twelve (12) months old and the traffic volumes have not been significantly changed due to more recent development in the vicinity. The City Engineer or the designee shall approve all requests to use other available traffic counts.

Common rules for conducting traffic counts include, but are not limited to, the following:

- Peak hour turning movement volumes shall be conducted on Tuesdays, Wednesdays, or Thursdays during weeks not containing a holiday. Counts shall be conducted in favorable weather conditions.
- Counts shall be collected when schools and colleges are in session, but not during the first two weeks that the schools and colleges are in session. Counts collected when schools and colleges are not in session shall be approved by the City Engineer, including a methodology for adding historical school traffic volumes into the analysis.
- Counts shall be collected during AM (7:00 a.m. to 9:00 a.m.) and PM (4:00 p.m. to 6:00 p.m.) peak periods, unless otherwise specified (such as midday or weekend peak periods).
- Counts should include the peak hour factor calculation.
- A qualified traffic analyst shall observe each study intersection during peak hours of analysis and document their observations such as lane utilization, delay, queue lengths in the field, adjacent intersection queues affecting study intersection capacity, etc.

### 3.6. TRIP GENERATION

Trip generation should be based on one or more of the following:

- Institute of Transportation Engineers (ITE) Trip Generation Manual (most current edition)
  - Rates should be calculated using the average weight or weighted average formula when applicable.
  - Special consideration should be given for ITE rates based on old data or a small sample and may require additional data collection to determine the appropriate trip generation.
- New rates should be generated using community examples for uses not updated or included in the ITE Trip Generation Manual.

- No pass-by trip reductions are allowed unless justified and approved by the City Engineer.
- All assumptions shall have proper citation and justification for their use in the LTA.

Projected daily trips, AM and PM peak hour trips for the approved, pending and proposed project shall be summarized in a table. Trip generation rates, factors and source, as well as the totals for the inbound and outbound trips shall also be provided in a table. Trip generation should be summarized in a table form similar to the one below:

**Proposed Trip Generation for Weekday**

Land Use	Size	Daily		A.M. Peak Hour			P.M. Peak Hour		
		Rate	Trips	Rate In/Out	Trips In/Out	Trips Total	Rate In/Out	Trips In/Out	Trips Total
<b>Retail</b>	4 ksf	120	480	4 60/40	12/8	19	13.25 50/50	26/26	53
<b>Townhomes</b>	32 Apts	7.5	240	10 35/65	8/16	24	0.75 65/35	16/8	24
<b>Senior</b>	100 Units	3.6	360	12 40/60	17/26	43	0.43 60/40	26/170	43
<b>Total Trips</b>			<b>1080</b>		<b>37/49</b>	<b>86</b>		<b>68/52</b>	<b>120</b>

**3.7. TRIP DISTRIBUTION**

Trip distribution shall be based on existing travel patterns, locations of complimentary land uses, and/or information derived from the Fresno COG travel model such as a “select zone” analysis.

A figure illustrating the percentage of peak hour traffic going to and from various destinations along the transportation network shall be provided. A figure illustrating peak hour project-only trips at the driveways, study intersections, and roadway segments shall be provided based on the trip distribution. If the trip distribution is different between Existing, Near-Term, and Cumulative conditions, then a figure needs to be provided for each different trip distribution with supporting discussion and justification.

The travel model should be used for a general trip distribution to and from the north, south, east, and west directions; however, the project trips should be manually distributed to the driveways, intersections, and roadway segments. The travel model should not be relied upon to distribute project trips to specific intersection and driveway turn movements.

For General Plan Amendments, the local transportation analysis shall include a trip distribution to affected Caltrans freeway interchanges for both the current General Plan land use and the proposed land use per the GPA. All assumptions shall have proper citation and justification for their use.

### 3.8. APPROVED AND PENDING PROJECTS

Approved and pending projects located within the vicinity of the project (i.e., developments generating vehicle trips that would impact study intersections and/or roadway segments) or as determined by the City Engineer, that can reasonably be expected to be in place by the project's build out year must be included in the analysis. Related projects shall include all approved, pending, or constructed projects that are not occupied at the time of the existing traffic counts. A list of approved and pending projects shall be submitted to the Engineering Division for review and approval along with the scope of work. Engineering staff will work with consultants to develop the list if necessary.

A table summarizing the approved and pending projects with their locations, and trip generation shall be provided. If conditional use permit/parcel map/tract numbers are available, then they should be provided in the table. Pending projects are defined as those projects that have been accepted for processing by the City of Clovis Planning and Development Department.

Capital Improvement Projects (CIP) should be identified and documented with funding source and anticipated completion year. City Engineering staff should be contacted for information on CIP projects near a given project.

### 3.9. SITE ACCESS AND CIRCULATION

Site access and circulation analysis shall be conducted, and recommendations shall be included in the local transportation analysis to address safe and acceptable traffic operations. A figure illustrating the proposed site plan with proposed primary access points should be provided. Discussion on the location and distance of the access points from nearby intersections shall also be provided. The proposed site plan shall illustrate access points and peak hour project-only trips at the access points. For projects that are anticipated to generate truck traffic, truck operations shall also be evaluated to ensure adequacy of site design to satisfy truck loading demand on-site and within the vicinity of the project site, and to ensure that traffic operations on roadways and intersection are satisfactory.

The local transportation analysis should calculate anticipated queues and minimum required throat depth (MRTD) at the project access points and summarize these in a table. The analysis should also evaluate the proposed site plan for sight distance and other unsafe traffic conditions and provide recommendations to mitigate them.

The local transportation analysis shall also conceptually address safe pedestrian paths of travel from:

- residential developments to school sites;
- public streets to commercial and residential areas; and
- nearby bus stops to project sites.

### 3.10. QUEUING AT STUDY INTERSECTIONS

Queuing analysis for study intersections shall be conducted and documented in the local transportation analysis based on the LOS calculations. Recommendations for queues under existing conditions or projected to exceed the available storage shall be provided. Recommendations such as, but not limited to, extending existing storage and adding exclusive turn lanes and innovative techniques shall be considered and recommended.

### 3.11. TRAFFIC OPERATIONS THRESHOLDS

For study signalized intersections, a traffic operations issue is identified if the addition of the traffic generated from the proposed project results in any one of the following:

- Triggers a signalized intersection operating at acceptable LOS to operate at unacceptable levels of service
- Increases the average delay for a study signalized intersection that is already operating at unacceptable LOS

Unsignalized intersections should maintain a Level of Service no worse than LOS D. Unsignalized intersections may include all-way stop, or two-way stop controlled. The delay for unsignalized intersections should be computed as follows:

- All-way stop-controlled – use average delay
- Two-way stop-controlled – use worst approach delay

For unsignalized study intersections, an adverse traffic operations issue is identified if the addition of the traffic generated from the proposed project results in any one of the following:

- Triggers an unsignalized intersection operating at acceptable LOS to operate at unacceptable levels of service (from E or better to F) and meet the signal warrants criteria
- Increases the applicable delay for an unsignalized study intersection that is already operating at unacceptable LOS and meets the signal warrant criteria

Improvements to unsignalized intersections may include a change of traffic control, including yield control, traffic circle/roundabout, or a traffic signal. The CA MUTCD states that if one or more of the criteria for signal warrants is met, an engineering study is required to evaluate other factors to determine if an intersection must be signalized. When analyzed, the peak hour and 8-hour traffic signal warrants should be used to determine if a traffic signal is recommended to improve the adverse effects identified at an unsignalized intersection. Additionally, if a project is near a school or a downtown area with substantial pedestrian activity, then the City may require additional warrants to be evaluated such as pedestrian, accident history, etc. The City reserves the right to determine if a warranted signal will be installed.

### 3.12. ANALYSIS DISCUSSION

The local transportation analysis should discuss conclusions regarding the transportation issues caused by the proposed project on the roadway system. If the traffic generated by this and other projects requires improvements that are not covered by current impact fees, then the project's fair share percentage shall be calculated using peak-hour volumes and provided in the local transportation analysis.

For all recommendations to increase the number of travel lanes on a street or at an intersection as an improvement, the report must clearly identify the impacts associated with such a change, such as whether or not additional right of way will be required and whether it is feasible to acquire the right of way based on the level of development of the adjacent land and buildings, if any. All improvements should be reviewed in the field to make sure that they can be accommodated. If they cannot be accommodated or are not feasible, those findings need to be included in the local transportation analysis.

The local transportation analysis should discuss other possible adverse impacts on traffic. Examples of such impacts include:

- the limited visibility of access points on curved roadways
- the need for pavement widening to provide left-turn and right-turn lanes at access points into the proposed project
- the impact of increased traffic volumes on local residential streets
- the need for road realignment to improve sight distance

Projects which propose to amend the City's General Plan Land Use and substantially increase potential traffic generation must provide an analysis of the project at current planned land use versus proposed land use in the build out condition for the project area, including future cumulative conditions. The purpose of such analysis is to provide decision makers with the understanding of the planned circulation network's ability to accommodate additional traffic generation caused by the proposed General Plan Land Use amendments.

The LTA shall be provided as an electronic PDF copy to the City of Clovis City Engineer, according to the report format presented in Attachment D.

## 4. LEVEL OF ENVIRONMENTAL REVIEW

The City of Clovis has established procedures so that the level of environmental review for land use projects should be no greater than the level of environmental review prior to the implementation of SB 743. This section provides guidance on the level of environmental review and/or transportation analysis that may be required for various scenarios.

### 4.1. GENERAL PLAN CIRCULATION ELEMENT UPDATE

In 2022, the City of Clovis prepared a focused update to the 2014 General Plan Circulation Element which includes policy language additions that are aimed at reducing VMT by way of a variety of planning mechanisms. The City also prepared a Supplemental Environmental Impact Report (SEIR) for the 2014 Clovis General Plan Circulation Element Update. The SEIR evaluates potential land uses consistent with the General Plan and their associated VMT impacts.

The SEIR finds that implementation of the General Plan may result in VMT metrics that are greater than the applicable thresholds. Mitigation measures include policies to reduce VMT. Because the City cannot demonstrate that the implementation of these policies would achieve VMT reductions to meet the VMT thresholds, the impacts would remain significant and unavoidable.

Following approval of the General Plan Update and SEIR, individual land use development projects that are consistent with the General Plan may have the opportunity to tier their environmental review from the General Plan SEIR. The SEIR has disclosed the VMT impacts of land use development consistent with the General Plan. Therefore, these findings do not need to be disclosed in an EIR for individual projects that are consistent with the General Plan. If necessary, individual projects are required to implement mitigation measures consistent with the policies in the updated Circulation Element.

### 4.2. ENVIRONMENTAL REVIEW SCENARIOS

A land use development project may have different levels of required environmental documentation and transportation analysis depending on consistency with the General Plan and VMT requirements.

Regardless of the requirements for VMT analysis, evaluation of other CEQA transportation criteria (policies, hazards, emergency access) for the CEQA document and a Local Transportation Analysis may still be required.

#### 4.2.1. Project Has Non-Transportation Environmental Impacts

If a proposed project will have environmental impacts other than or in addition to transportation impacts that require disclosure and possible significant unavoidable, an EIR is likely to be required regardless of transportation conditions.



A project which requires an EIR for other subjects may still be exempt from a CEQA VMT analysis if it meets the screening criteria described in Section 2.1.1. However, evaluation of other CEQA transportation criteria (policies, hazards, emergency access) and a Local Transportation Analysis may still be required.

Probable Environmental Review
Environmental Impact Report (EIR)
Supporting TIA (TIA may be Local Transportation Analysis only)

4.2.2. Project Has Transportation Impacts Only

If a proposed project will have potential transportation impacts but no other environmental impacts which require an EIR, the level of environmental review will depend on these TIA guidelines.

4.2.2.1. Project Meets VMT Screening Criteria

If a project qualifies for one of the screening criteria described in Section 2.1.1, it may be exempt from a CEQA VMT analysis. However, evaluation of other CEQA transportation criteria (policies, hazards, emergency access) and a Local Transportation Analysis may still be required.

The screening for low VMT areas must be based on the base year (2019) mapping as shown in Attachment B. Screening cannot be based on mapping of VMT under future cumulative conditions.

Probable Environmental Review
Mitigated Negative Declaration (MND)
Supporting TIA (TIA may be Local Transportation Analysis only)

4.2.2.2. Project Does Not Meet VMT Screening Criteria, Project VMT Analysis Under Threshold

If a project does not qualify for one of the screening criteria described in Section 2.1.1, it still may be exempt from a CEQA VMT impact finding. In many cases, the existing land uses represented in the base year VMT screening maps do not correctly represent proposed land uses. A project-specific VMT analysis using the Fresno COG travel model should be used to identify the specific VMT characteristics of the proposed project relative to base year conditions. This analysis would supersede the VMT screening maps.

The 2022 General Plan SEIR included an evaluation of future (2042) cumulative VMT conditions with probable development of the General Plan. Maps of this analysis are included in Attachment

E. The future VMT maps cannot be used for screening from VMT analysis requirements, but can provide a preview of likely outcomes of a project-specific VMT analysis in each area of the City.

If the project-specific VMT analysis shows that the proposed project would be below the applicable VMT thresholds, then a CEQA VMT impact finding would not be required.

Probable Environmental Review
Mitigated Negative Declaration (MND)
Supporting TIA with Project-Specific VMT Analysis and Local Transportation Analysis

*4.2.2.3. Project Does Not Meet VMT Screening Criteria, Project VMT Analysis Above Threshold, Project Consistent with General Plan*

If a project does not qualify for one of the screening criteria described in Section 2.1.1, a project-specific VMT analysis using the Fresno COG travel model should be used to identify the specific VMT characteristics of the proposed project relative to base year conditions.

If the project-specific VMT analysis shows that the proposed project would be above the applicable VMT thresholds, then a CEQA VMT impact finding would be required. The project would be required to identify mitigation for VMT impacts, including mitigation consistent with the General Plan Circulation Element.

If it cannot be demonstrated that mitigation would reduce VMT of the proposed project below the applicable threshold, then a significant and unavoidable impact will be reported. Without the General Plan SEIR, disclosure of this significant and unavoidable impact would have triggered a requirement for an EIR. With the approval of the General Plan SEIR, the significant and unavoidable VMT impacts associated with General Plan development have already been disclosed. Therefore, a less extensive environmental document may be appropriate, as long as the proposed project is consistent with the General Plan.

Probable Environmental Review
Mitigated Negative Declaration (MND) with VMT Mitigation
Supporting TIA with Project-Specific VMT Analysis and Local Transportation Analysis

*4.2.2.4. Project Does Not Meet VMT Screening Criteria, VMT Analysis Above Threshold, Not Consistent with General Plan*

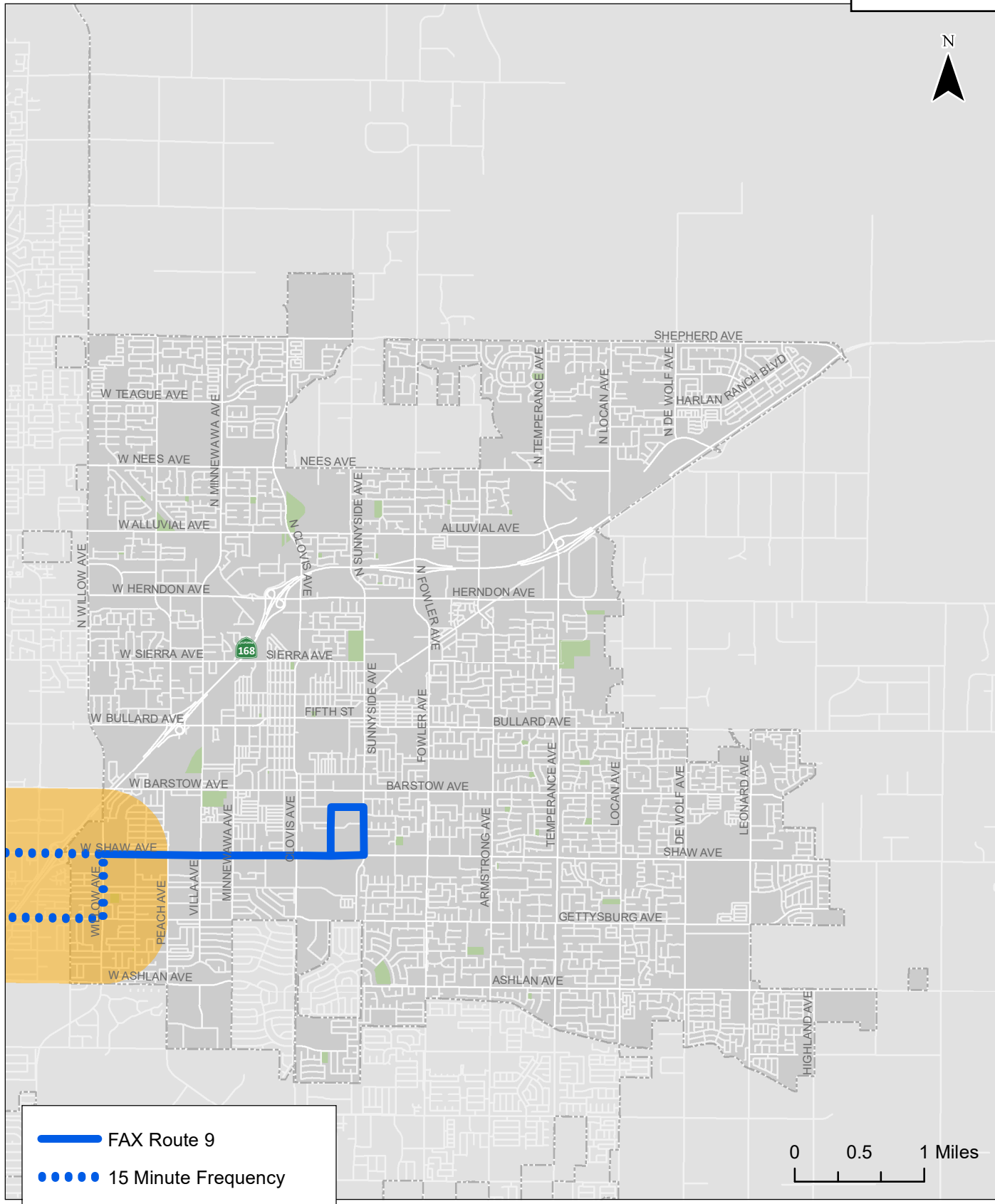
If a project does not qualify for one of the screening criteria described in Section 2.1.1, and the project is not consistent with the General Plan or represents a General Plan Amendment, then it may not be possible to tier off the General Plan SEIR.





If a project-specific VMT analysis shows that the proposed project would be above the applicable VMT thresholds, then a CEQA VMT impact finding would be required. The project would be required to identify mitigation for VMT impacts.

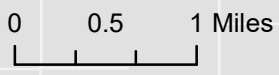
If it cannot be demonstrated that mitigation would reduce VMT of the proposed project below the applicable threshold, then a significant and unavoidable impact will be reported. Since the project is not consistent with the General Plan, the City may choose to perform a comparative analysis of the proposed project to determine if beneficial (or equivalent) VMT impacts would result, in comparison to pre-project conditions. If substantial evidence supports the conclusion that VMT impacts resulting from the project would be equivalent to or less-than (beneficial effect) the pre-project condition, the City may make a finding that the impacts have been disclosed through the General Plan SEIR. If substantial evidence does not support a determination that equivalent or beneficial effects would result from the proposed project, the VMT impacts would not have been previously disclosed. Therefore, an EIR is likely to be required.

Probable Environmental Review
EIR with VMT Mitigation and Findings of Overriding Considerations
Supporting TIA with Project-Specific VMT Analysis and Local Transportation Analysis

# Attachment A: High Quality Transit Areas Map



-  FAX Route 9
-  15 Minute Frequency
-  High Quality Transit Area
-  City Boundary

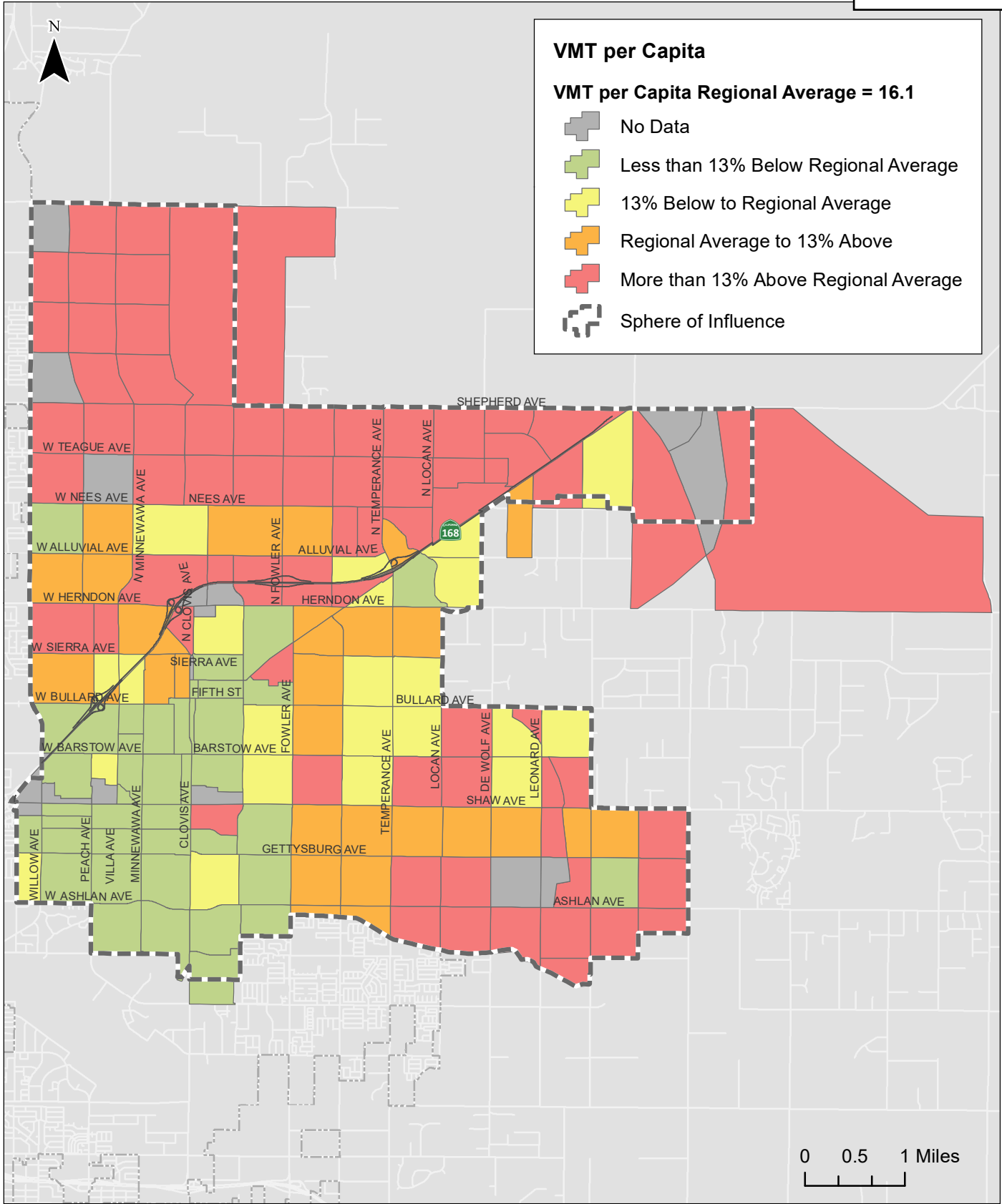


**Existing High Quality Transit Areas  
City of Clovis VMT Implementation**

**Figure  
A1**

H:\2424727 - Ceres SSAR\p\gis\High\_Quality\_Transit - v3.mxd - gcransky - 8/14 AM 7/14/2020

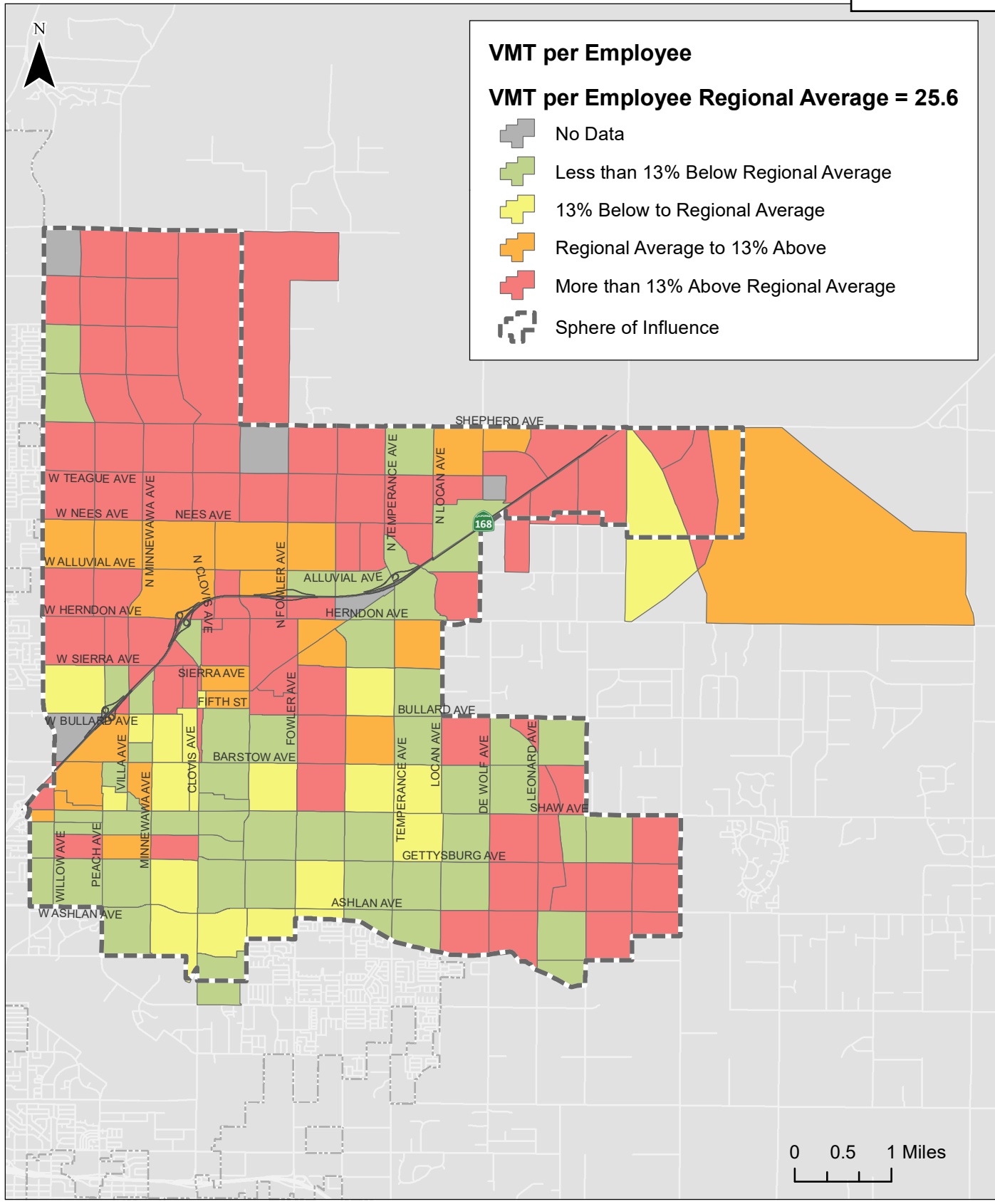
## Attachment B: VMT Screening Maps



Existing VMT Per Capita (2019)  
City of Clovis VMT Implementation

Figure  
**B1**

H:\2424913 - City of Clovis VMT Implementation\gis\Clovis\_VMTpercap\_(2019)\_nolabel.mxd - gearsky - 9:20 AM 2/4/2021



**VMT per Employee**

**VMT per Employee Regional Average = 25.6**

- No Data
- Less than 13% Below Regional Average
- 13% Below to Regional Average
- Regional Average to 13% Above
- More than 13% Above Regional Average
- Sphere of Influence

**Existing VMT Per Employee (2019)  
City of Clovis VMT Implementation**

**Figure  
B2**

H:\24913 - City of Clovis VMT Implementation\GIS\Clovis\_VMT\peremp\2019\_nolabel.mxd - garsky - 9:22 AM 2/4/2021



## Attachment C: VMT-Reducing Transportation Projects

VMT-Reducing Transportation Projects
Rehabilitation, maintenance, replacement, safety, and repair projects designed to improve the condition of existing transportation assets (e.g., highways; roadways; bridges; culverts; Transportation Management System field elements such as cameras, message signs, detection, or signals; tunnels; transit systems; and assets that serve bicycle and pedestrian facilities) and that do not add additional motor vehicle capacity
Roadside safety devices or hardware installation such as median barriers and guardrails
Roadway shoulder enhancements to provide “breakdown space,” dedicated space for use only by transit vehicles, to provide bicycle access, or to otherwise improve safety, but which will not be used as automobile vehicle travel lanes
Addition of an auxiliary lane of less than one mile in length designed to improve roadway safety
Installation, removal, or reconfiguration of traffic lanes that are not for through traffic, such as left, right, and U-turn pockets, two-way left turn lanes, or emergency breakdown lanes that are not utilized as through lanes
Addition of roadway capacity on local or collector streets provided the project also substantially improves conditions for pedestrians, cyclists, and, if applicable, transit
Conversion of existing general purpose lanes (including ramps) to managed lanes or transit lanes, or changing lane management in a manner that would not substantially increase vehicle travel
Addition of a new lane that is permanently restricted to use only by transit vehicles
Reduction in number of through lanes
Grade separation to separate vehicles from rail, transit, pedestrians or bicycles, or to replace a lane in order to separate preferential vehicles (e.g., HOV, HOT, or trucks) from general vehicles
Installation, removal, or reconfiguration of traffic control devices, including Transit Signal Priority (TSP) features
Installation of traffic metering systems, detection systems, cameras, changeable message signs and other electronics designed to optimize vehicle, bicycle, or pedestrian flow
Timing of signals to optimize vehicle, bicycle, or pedestrian flow
Installation of roundabouts or traffic circles
Installation or reconfiguration of traffic calming devices
Adoption of or increase in tolls
Addition of tolled lanes, where tolls are sufficient to mitigate VMT increase
Initiation of new transit service
Conversion of streets from one-way to two-way operation with no net increase in number of traffic lanes
Removal or relocation of off-street or on-street parking spaces

<b>VMT-Reducing Transportation Projects</b>
Adoption or modification of on-street parking or loading restrictions (including meters, time limits, accessible spaces, and preferential/reserved parking permit programs)
Addition of traffic wayfinding signage
Rehabilitation and maintenance projects that do not add motor vehicle capacity
Addition of new or enhanced bike or pedestrian facilities on existing streets/highways or within existing public rights-of-way
Addition of Class I bike paths, trails, multi-use paths, or other off-road facilities that serve non-motorized travel
Installation of publicly available alternative fuel/charging infrastructure
Addition of passing lanes, truck climbing lanes, or truck brake-check lanes in rural areas that do not increase overall vehicle capacity along the corridor

## Attachment D: Local Transportation Analysis Report Format

## Local Transportation Analysis Report Format

### COVER PAGE

1. Project address
2. Project name (if applicable)
3. Prepared for
4. Date (month/day/year)
5. Consultant contact information including a contact name
6. Consultant job number (if applicable)
7. Entitlement Number (i.e. Tract or CUP Number)
8. City Planner Name (if known)
9. Stamp and/or signature of qualified engineer or authorized owner/principal of firm stating the study was prepared and reviewed under their supervision and direction.

### TABLE OF CONTENTS LIST OF FIGURES LIST OF TABLES

### EXECUTIVE SUMMARY

Provide summary of the LTA, project location and size, intersections analyzed, study scenarios, impacts, mitigation and recommendations in a figure and table. Methodology used to analyze the impacts does not need to be included in the executive summary. Document results of LOS analysis, intersections and roadway segments Provide summary of site access and circulation. Results of LOS analysis should be summarized in a table form as follows for both existing and cumulative scenarios:

*Summary of Intersection Level of Service*

<i>Intersection</i>	<i>Existing</i>		<i>Existing plus Proposed Project</i>		<i>Existing plus Approved and Pending plus Proposed Project</i>	
	<i>Delay</i>	<i>LOS</i>	<i>Delay</i>	<i>LOS</i>	<i>Delay</i>	<i>LOS</i>

### INTRODUCTION

Provide description of the project, location, size and proposed primary access. A vicinity map showing the site location and the study area relative to other transportation systems along with study intersections and roadway segments should be provided. Document study intersections, roadway segments and study scenarios providing brief explanation on each study scenarios. Describe the methodology used to analyze the impacts of the study and the thresholds for determining an impact.

### EXISTING CONDITIONS

Provide a description of existing streets and roadways within the project site (if any) and in the surrounding area. Include information on the roadway classifications (per the

Clovis General Plan Circulation Element), the number of lanes, posted speed limits, divided/undivided and bike lanes.

Existing daily directional and peak-hour through and turning traffic volumes on the roadways surrounding and/or logically associated with the project site, including major highways and freeways. Local streets affected by the project should also be shown. Each report shall include appendices providing count data used in the preparation of the report. The source and date of the traffic volume information shall be indicated. A figure illustrating the peak hour traffic volumes, lane configurations, and traffic control at the study intersections and roadway segments should be provided.

All assumed roadways and intersections or any other transportation circulation improvements must be identified and discussed. The discussion should include the scope and the status of the assumed improvements including the construction schedule and financing plan.

In addition, any transit facilities within 1,300 feet of the project or study intersections/roadways segments, including the service provider(s), routes, frequency and location/amenities of existing bus stops should be provided.

Existing and planned bicycle and pedestrian facilities adjacent to the project site, utilized by the project, connected to by the project, or impacted by the project should be identified and described in detail.

Results of LOS analysis should be summarized in table (in a format illustrated above) and discussed. If any of the study intersections or roadway segments are operating at unacceptable levels, mitigation measures should be identified.

#### EXISTING PLUS PROPOSED PROJECT CONDITIONS

This scenario is required by CEQA to show the impacts of the proposed project on the existing conditions. It should include a project description, trip generation and distribution, level of service analysis, and appropriate tables, figures, and recommendations/mitigation as described below.

##### Project Description

A description of the project, including factors which quantify traffic generators, e.g., dwelling units, square feet of office space, persons to be employed, restaurant seats, acres of raw land, etc. Provide site plan including access, project-only trips at the access points, circulation, parking, and loading as applicable.

##### Trip Generation and Trip Distribution

Provide trip generation and trip distribution. Provide any relevant information, discussion if applicable.

### Level of Service Analysis

Provide a figure illustrating peak hour traffic volumes at the study intersections and roadway segments for Existing plus Proposed Project Conditions. Results of LOS analysis should be summarized in table and discussed. If any of the study intersections or roadway segments are projected to operate at unacceptable levels, mitigation measures should be identified.

### Site Access and Circulation

Provide site access and circulation analysis and discussion as per the "SITE ACCESS AND CIRCULATION" Section of this document. Provide a figure showing on site and circulation recommendations.

### NEAR-TERM ANALYSIS (EXISTING PLUS APPROVED AND PENDING PROJECT PLUS PROPOSED PROJECT CONDITIONS)

Approved and pending projects located within the vicinity of project, (projects that would impact study intersections and/or roadway segments or as determined by Traffic Engineering Manager), that can reasonably be expected to be in place by the project's construction year along with the trip generation should be summarized in a table. A figure illustrating the Existing plus Approved and Pending Projects Plus Proposed Project peak hour traffic volumes should be provided.

Results of LOS analysis should be summarized in table and discussed. If any of the study intersections or roadway segments are projected to operate at unacceptable levels, mitigation measures should be identified.

### CUMULATIVE 20-YEAR AND CUMULATIVE 20-YEAR PLUS PROJECT CONDITIONS

Provide similar information for both scenarios as above referenced scenarios. Please discuss in detail how the traffic volume forecasts were developed using the Fresno COG model. This information should be easy to follow and reproducible by a peer consultant.

### QUEUING

Discuss and provide recommendations to mitigate unacceptable queues at study intersections under appropriate scenarios as applicable.

### SIGNAL WARRANTS

Provide signal warrants analysis and discuss results of the analysis under appropriate scenarios as applicable.

### CONCLUSION

### MITIGATIONS & RECOMMENDATIONS

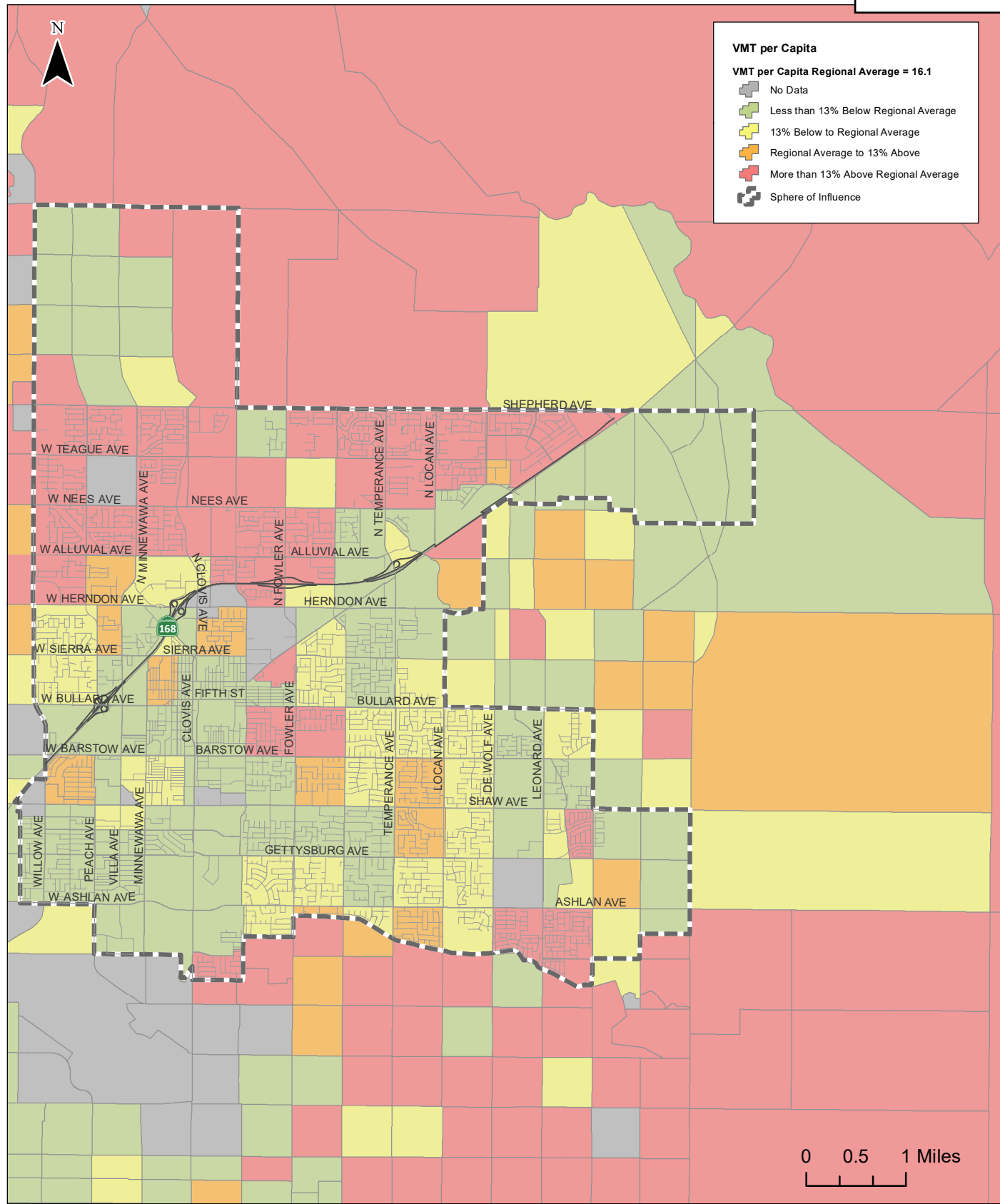
Provide objective recommendations in a table or figure and discuss the timing and funding of recommendations.

APPENDIX

- Traffic Counts
- Fresno COG Model Runs and Turning Movement Forecast outputs
- Signal Warrants
- References and Bibliography Level Service Calculation Sheets



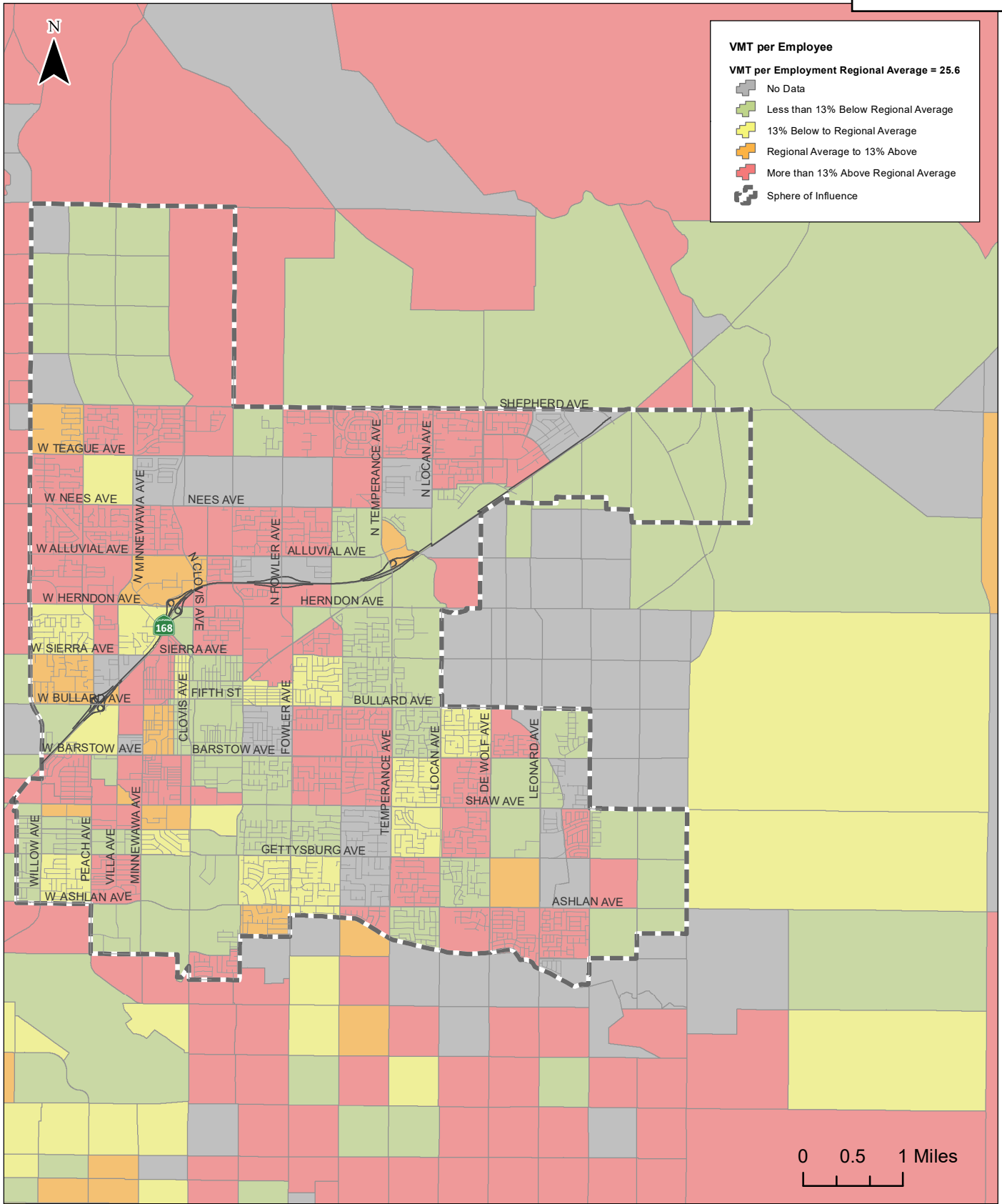
## Attachment E: General Plan 2042 VMT Maps



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

**Figure  
E1**

H:\2424913 - City of Clovis VMT Implementation\GIS\Clovis\_VMTPerCap\_2042\_2019avg.mxd - maronson - 8:46 AM 6/16/2022



**VMT Per Employee (2042)  
Compared to 2019 Regional Average (25.6)**

**Figure  
E2**

H:\2424913 - City of Clovis VMT Implementation\gis\Clovis\_VMTPeremp\_2042\_2019avg\_20220616.mxd - maranson - 6:53 AM 6/16/2022

SUPPLEMENTAL  
DRAFT ENVIRONMENTAL IMPACT REPORT

FOR THE

2014 CLOVIS GENERAL PLAN  
CIRCULATION ELEMENT UPDATE

(State Clearinghouse No. 2012061069)

JUNE 29, 2022

*Prepared for:*

City of Clovis | Planning Division  
1033 Fifth Street  
Clovis, CA 93612  
559.324.2346

*Prepared by:*

De Novo Planning Group  
1020 Suncoast Lane, Suite 106  
El Dorado Hills, CA 95762  
(916) 812-7927

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

A Land Use Planning, Design, and Environmental Firm



SUPPLEMENTAL  
DRAFT ENVIRONMENTAL IMPACT REPORT

FOR THE

2014 CLOVIS GENERAL PLAN  
CIRCULATION ELEMENT UPDATE

(State Clearinghouse No. 2012061069)

JUNE 29, 2022

*Prepared for:*

City of Clovis  
Contact: Ricky Caperton, AICP, Deputy City Planner  
Planning Division  
1033 Fifth Street  
Clovis, California 93612  
559.324.2346

*Prepared by:*

De Novo Planning Group  
1020 Suncast Lane, Suite 106  
El Dorado Hills, CA 95762  
(916) 812-7927



# TABLE OF CONTENTS

## DRAFT EIR

Chapter	Page Number
Executive Summary.....	ES-1
1.0 Introduction .....	1.0-1
1.1 Introduction .....	1.0-1
1.2 Purpose of the EIR .....	1.0-1
1.3 Type of EIR .....	1.0-2
1.4 Known Responsible and Trustee Agencies .....	1.0-2
1.5 Environmental Review Process.....	1.0-3
1.6 Organization and Scope .....	1.0-4
1.7 Comments Received on the Notice of Preparation .....	1.0-6
2.0 Project Description .....	2.0-1
2.1 Background and Overview.....	2.0-1
2.2 Project Objectives.....	2.0-5
2.3 Description of Proposed Project.....	2.0-5
2.4 Uses of the EIR and Required Agency Approvals.....	2.0-11
3.1 Transportation and Circulation.....	3.1-1
3.14.1 Environmental Setting .....	3.1-1
3.14.2 Regulatory Setting .....	3.1-2
3.14.3 Impacts and Mitigation Measures.....	3.1-16
4.0 Other CEQA-Required Topics.....	4.0-1
4.1 Cumulative Setting and Impact Analysis.....	4.0-1
4.2 Significant Irreversible and Adverse Effects .....	4.0-5
4.3 Significant and Unavoidable Impacts.....	4.0-5



# TABLE OF CONTENTS

5.0 Alternatives ..... 5.0-1  
     5.1 CEQA Requirements..... 5.0-1  
     5.2 Alternatives Considered in this EIR..... 5.0-3  
     5.3 Environmental Analysis..... 5.0-3  
 6.0 Report Preparers..... 6.0-1  
 7.0 References ..... 7.0-1

**Table** **Page Number**

Table ES-1: Comparison of Alternatives to the Proposed Project ..... ES-2  
 Table ES-2: Project Impacts and Proposed Mitigation Measures ..... ES-4  
 Table 2.0-1: Sample Small Projects (less than 500 daily trips) ..... 2.0-2  
 Table 3.1-1: Demographics and VMT, 2019 Baseline Conditions ..... 3.1-2  
 Table 3.1-2: Clovis General Plan Land Use..... 3.1-18  
 Table 3.1-3: VMT Thresholds for Land Development Projects ..... 3.1-20  
 Table 3.1-4: VMT Results Summary ..... 3.1-22  
 Table 4.0-1: Clovis General Plan Land Use..... 4.0-2  
 Table 5.0-1: Comparison of Alternatives to the Proposed Project..... 5.0-5

**Figures**

Note: Figures are located at the end of the chapters.

Figure 2.0-1 Regional Location Map  
 Figure 2.0-2 Clovis Planning Area  
 Figure 2.0-3 Land Use Diagram  
 Figure 2.0-4 Urban Centers  
 Figure 2.0-5 Focus Areas and Specific Plans  
 Figure 3.1-1 VMT Per Capita (2042) Compared to 2019 Regional Average (16.1)  
 Figure 3.1-2 VMT Per Employee (2042) Compared to 2019 Regional Average (25.6)

**Appendices**

Appendix A – Notice of Preparation  
 Appendix B – NOP comments

## PURPOSE

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

## AREAS OF CONTROVERSY AND ISSUES TO BE RESOLVED

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

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

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

## ALTERNATIVES TO THE PROPOSED PROJECT

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

### NO PROJECT ALTERNATIVE

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

**POLICY CHANGE ONLY ALTERNATIVE**

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

**TIA GUIDELINES ONLY ALTERNATIVE**

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

**ENVIRONMENTALLY SUPERIOR ALTERNATIVE**

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

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

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

## SUMMARY OF IMPACTS AND MITIGATION MEASURES

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

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

ES EXECUTIVE SUMMARY

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

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

CC – cumulatively considerable

PS – potentially significant

LCC – less than cumulatively considerable

SU – significant and unavoidable

LS – less than significant

NI – No Impact

EXECUTIVE SUMMARY **ES**

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

CC – cumulatively considerable

PS – potentially significant

LCC – less than cumulatively considerable

SU – significant and unavoidable

LS – less than significant

NI – No Impact

ES

EXECUTIVE SUMMARY

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

CC – cumulatively considerable

LCC – less than cumulatively considerable

LS – less than significant

PS – potentially significant

SU – significant and unavoidable

NI – No Impact

## 1.1 INTRODUCTION

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

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

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

## 1.2 PURPOSE OF THE EIR

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

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

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



## 1.0 INTRODUCTION

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

### 1.3 TYPE OF EIR

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

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

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

### 1.4 KNOWN RESPONSIBLE AND TRUSTEE AGENCIES

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

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

## 1.5 ENVIRONMENTAL REVIEW PROCESS

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

### NOTICE OF PREPARATION AND INITIAL STUDY

---

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

### DRAFT SUPPLEMENTAL EIR

---

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

### PUBLIC NOTICE/PUBLIC REVIEW

---

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

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

## 1.0 INTRODUCTION

### RESPONSE TO COMMENTS/FINAL SUPPLEMENTAL EIR

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

### CERTIFICATION OF THE SEIR/PROJECT CONSIDERATION

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

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

## 1.6 ORGANIZATION AND SCOPE

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

This Draft EIR is organized in the following manner:

### EXECUTIVE SUMMARY

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

---

## CHAPTER 1.0 - INTRODUCTION

---

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

---

## CHAPTER 2.0 - PROJECT DESCRIPTION

---

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

---

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

---

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

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

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

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

The following environmental topics are addressed in this section:

- Transportation and Circulation

---

## CHAPTER 4.0 - OTHER CEQA-REQUIRED TOPICS

---

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

---

## CHAPTER 5.0 - ALTERNATIVES

---

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

## 1.0 INTRODUCTION

---

### CHAPTER 6.0 - REPORT PREPARERS

---

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

### APPENDICES

---

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

### 1.7 COMMENTS RECEIVED ON THE NOTICE OF PREPARATION

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

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

## 2.1 BACKGROUND AND OVERVIEW

### TRANSPORTATION PLANNING CHANGES

---

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

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

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

### CITY GUIDELINES AND POLICY CHANGES

---

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

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

## 2.0 PROJECT DESCRIPTION

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

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

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

### Project Screening

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

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

#### SMALL PROJECTS

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

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

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

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

#### AFFORDABLE HOUSING

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

#### LOCAL-SERVING RETAIL AND PUBLIC FACILITIES

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

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

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

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

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

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

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

---

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



## 2.0 PROJECT DESCRIPTION

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

### TRANSPORTATION ANALYSIS ZONES (TAZ)

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

### PROJECT LOCATED IN LOW VMT AREAS

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

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

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

### CONSISTENCY WITH RTP/SCS

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

## Circulation Element Update

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

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

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

## 2.2 PROJECT OBJECTIVES

The following objectives were established for the proposed Project:

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

## 2.3 DESCRIPTION OF PROPOSED PROJECT

### FOCUSED UPDATE

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

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

### GOALS AND POLICIES

#### **Clovis General Plan**

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

## 2.0 PROJECT DESCRIPTION

### CLOVIS GENERAL PLAN GOALS AND POLICIES

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

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

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

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

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

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

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

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

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

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

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

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

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

## PROJECT DESCRIPTION 2.0

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

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

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

## 2.0 PROJECT DESCRIPTION

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

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

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

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

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

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

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

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

**2.0 PROJECT DESCRIPTION**

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

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

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

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

## 2.6 USES OF THE EIR AND REQUIRED AGENCY APPROVALS

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

### CITY OF CLOVIS

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

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

### SUBSEQUENT USE OF THE EIR

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

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



## 2.0 PROJECT DESCRIPTION

---

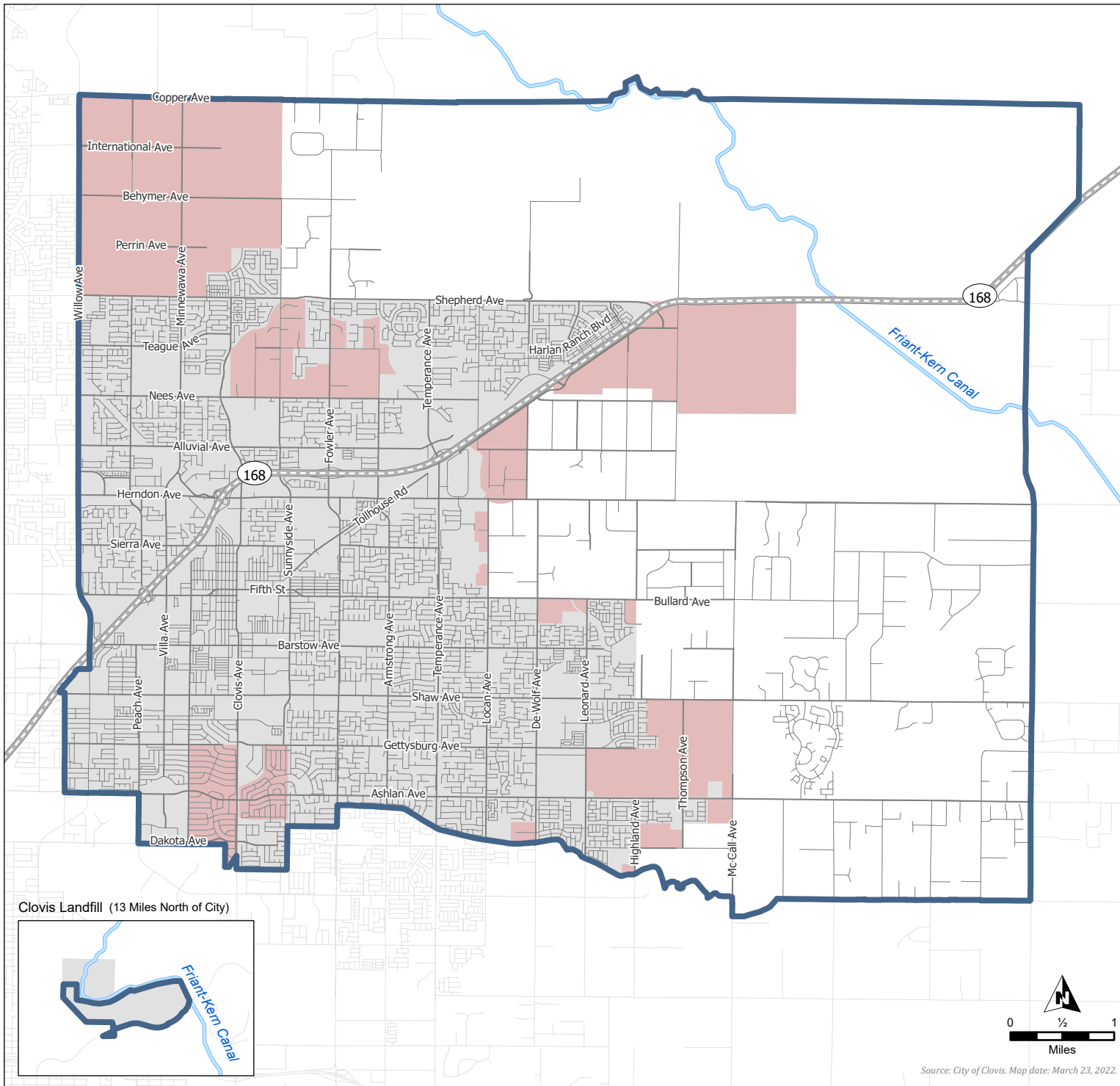
### OTHER GOVERNMENTAL AGENCY APPROVALS

---

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

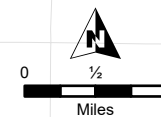
- California Department of Transportation (Caltrans) coordination regarding regional transportation planning efforts.
- Fresno Council of Governments (Fresno COG) coordination regarding regional transportation planning efforts.

**Figure 2.0-1  
Clovis Planning Area**



**LEGEND**

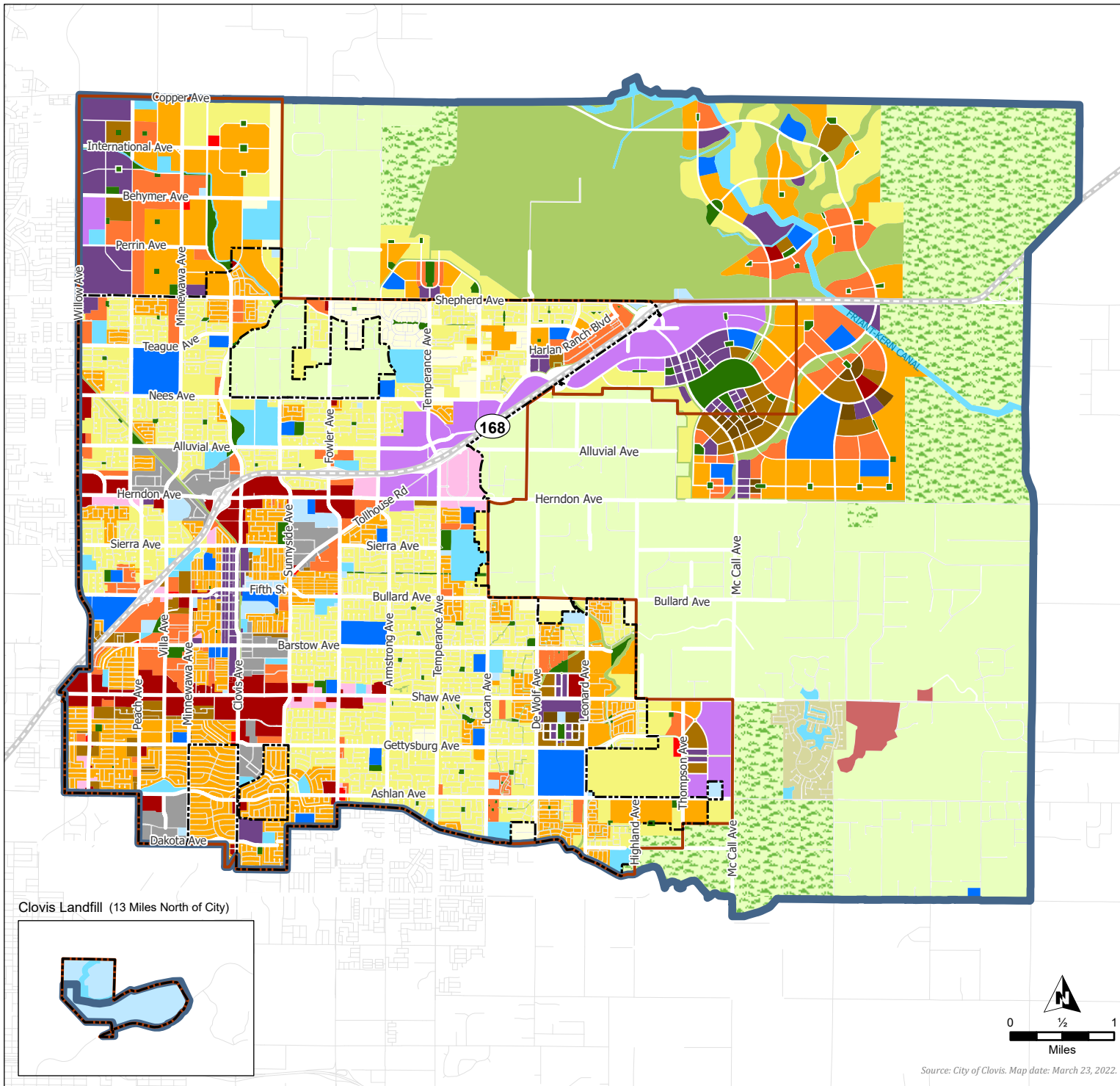
- Clovis City Limits
- Clovis Sphere of Influence
- Planning Area Boundary



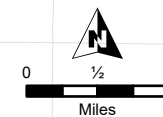
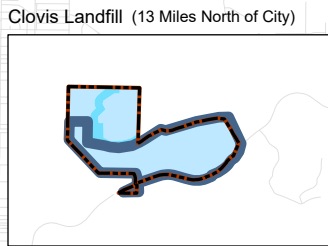
Source: City of Clovis. Map date: March 23, 2022.

*This page left intentionally blank.*

**Figure 2.0-2  
Land Use Diagram**



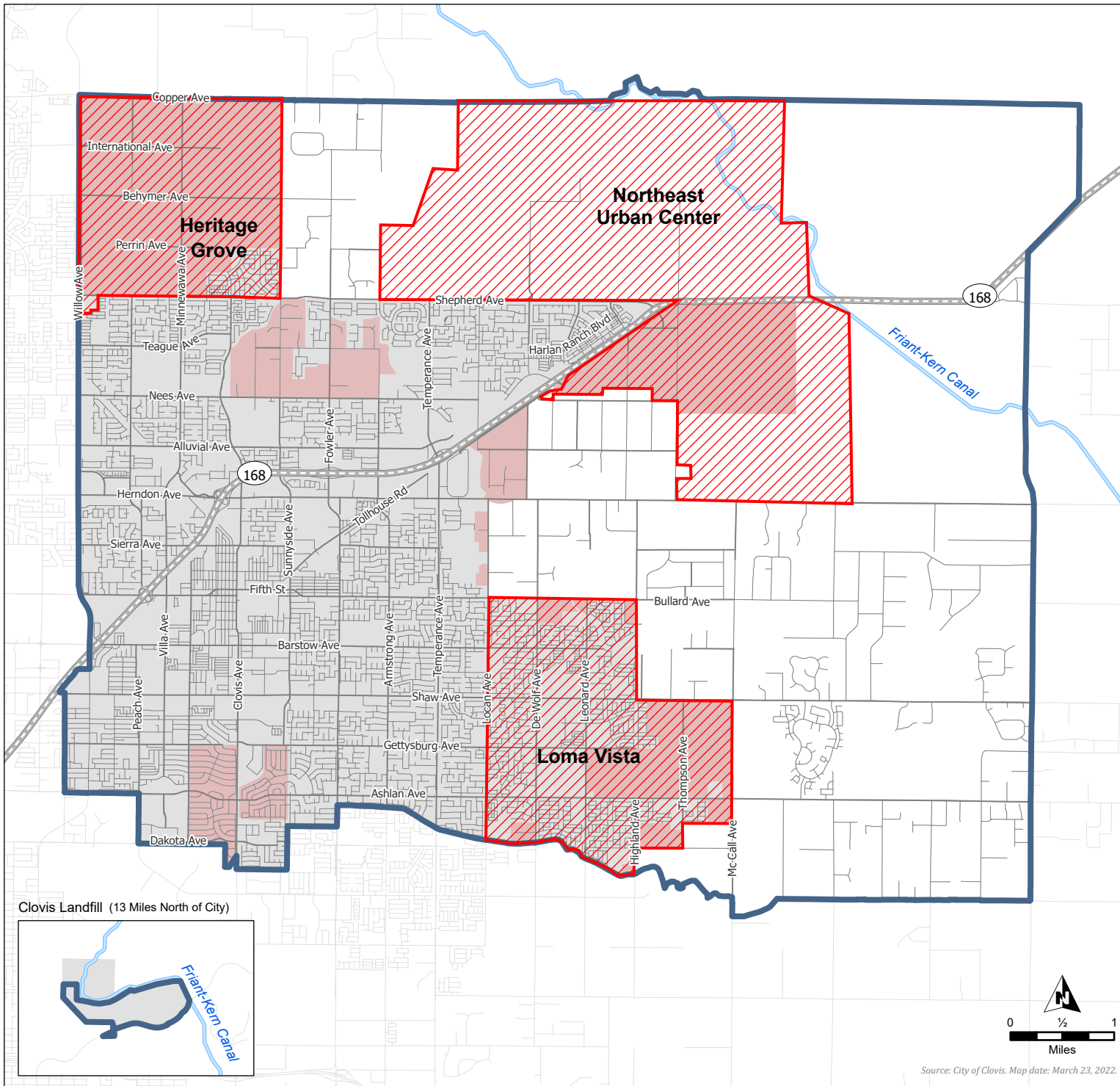
- LEGEND**
- Clovis City Limits
  - Sphere of Influence
  - Planning Area Boundary
  - State Hwy 168
  - AG: Agriculture (1 DU/20 Ac)
  - RR: Rural Residential
  - VL: Very Low Density Residential (0.6-2.0 DU/Ac)
  - L: Low Density Residential (2.1-4.0 DU/Ac)
  - M: Medium Density Residential (4.1-7.0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



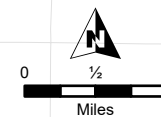
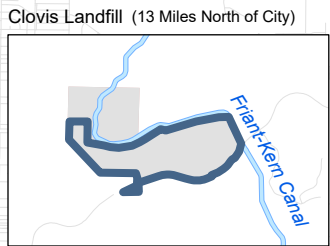
Source: City of Clovis. Map date: March 23, 2022.

*This page left intentionally blank.*

**Figure 2.0-3  
Urban Centers**



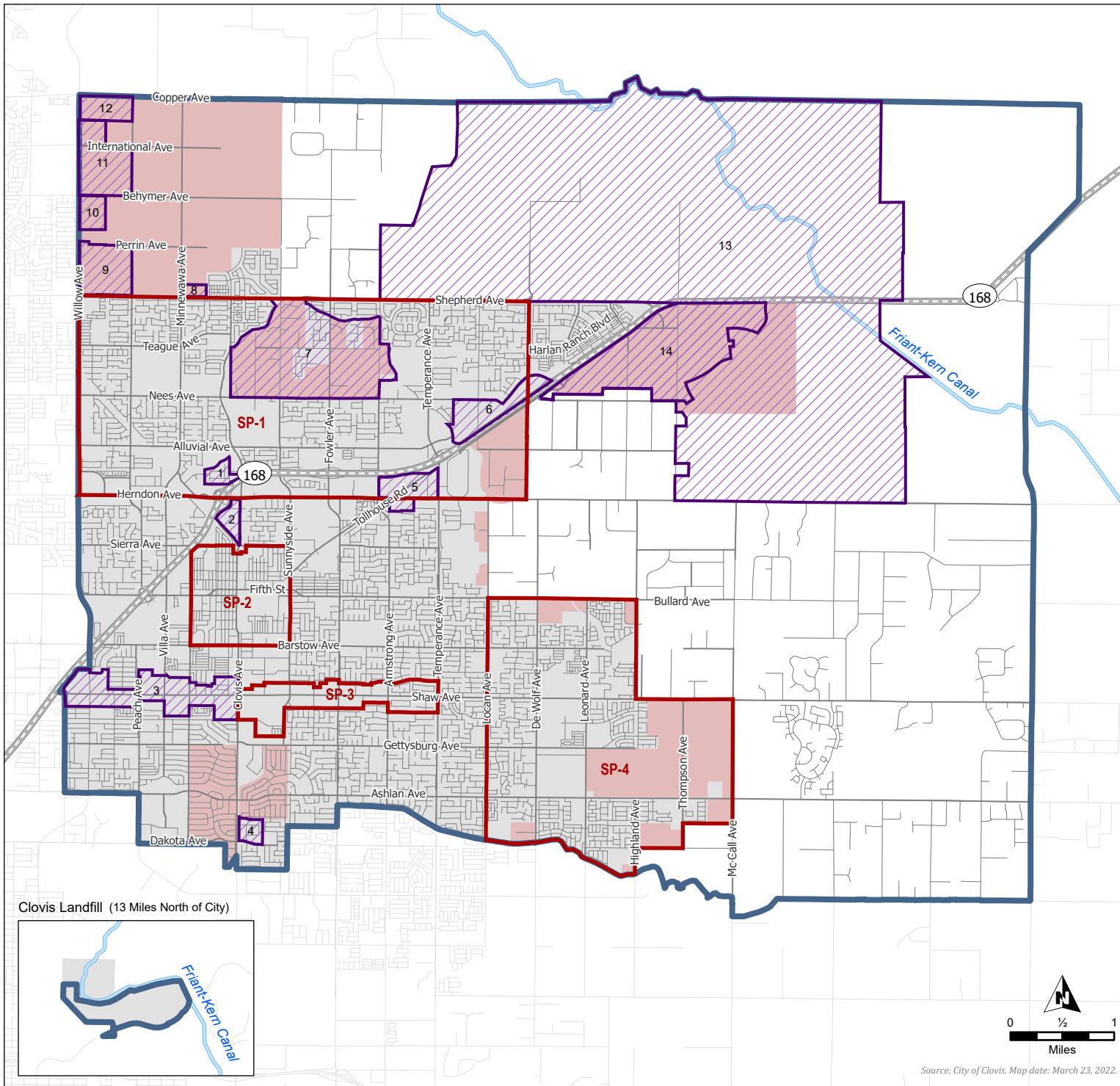
- LEGEND**
- Urban Centers
  - Clovis City Limits
  - Clovis Sphere of Influence
  - Planning Area Boundary



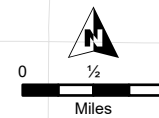
Source: City of Clovis. Map date: March 23, 2022.

*This page left intentionally blank.*

**Figure 2.0-4  
Focus Areas**



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



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



*This page left intentionally blank.*

## TRANSPORTATION AND CIRCULATION

### 3.1

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

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

#### 3.1.1 ENVIRONMENTAL SETTING

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

##### **Vehicle Miles Traveled**

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

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

# 3.1

## TRANSPORTATION AND CIRCULATION

Two measures of VMT are used in this analysis:

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

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

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

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

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

SOURCES: FRESNO COG, KITTELSON & ASSOCIATES, 2022

### 3.1.2 REGULATORY SETTING

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

---

## FEDERAL

---

### **Federal Highway Administration**

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

### **Federal Transit Administration**

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

---

## STATE

---

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

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

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

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

### **Assembly Bill 417**

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

1. Restriping of streets and highways

## 3.1 TRANSPORTATION AND CIRCULATION

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

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

### Assembly Bill 1358

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

### Senate Bill 743

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

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

Screening criteria include:

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

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

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

Other key guidance includes:

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

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

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

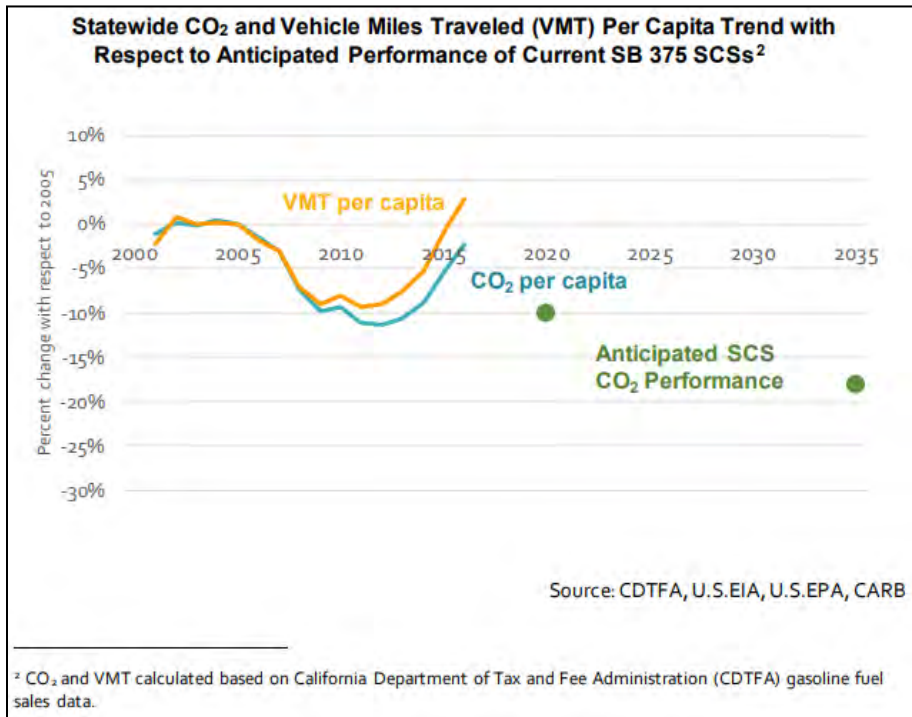
### 3.1

## TRANSPORTATION AND CIRCULATION

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

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

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



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

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

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

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

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

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

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

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

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

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

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

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

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



## 3.1 TRANSPORTATION AND CIRCULATION

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

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

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

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

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

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

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

### **OPR General Plan Guidelines**

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

---

**REGIONAL**

---

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

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

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

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

**Fresno County Congestion Management Process**

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

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

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

## 3.1 TRANSPORTATION AND CIRCULATION

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

### LOCAL

#### Clovis General Plan

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

#### CLOVIS GENERAL PLAN GOALS AND POLICIES

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

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

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

## TRANSPORTATION AND CIRCULATION

3.1

- Policy 1.6 **Internal circulation.** New development shall utilize a grid or modified-grid street pattern. Areas designated for residential and mixed-use village developments should feature short block lengths of 200 to 600 feet.
- Policy 1.7 **Narrow streets.** The City may permit curb-to-curb dimensions that are narrower than current standards on local streets to promote pedestrian and bicycle connectivity and enhance safety.
- Policy 1.8 **Network completion.** New development shall complete the extension of stub streets planned to connect to adjacent streets, where appropriate.

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

- Policy 2.1 **Level of service.** The following is the City's level of service (LOS) standards:
1. Achieve LOS D vehicle traffic operations during the a.m. and p.m. peak hours
  2. Allow exceptions on a case-by-case basis where lower levels of service would result in other public benefits, such as:
    - Preserving agriculture or open space land
    - Preserving the rural/historic character of a neighborhood
    - Preserving or creating a pedestrian-friendly environment in Old Town or mixed-use village districts
    - Avoiding adverse impacts to pedestrians, cyclists, and mass transit riders where right-of-way constraints would make capacity expansion infeasible
- Policy 2.2 **Multimodal LOS.** Monitor the evolution of multimodal level of service (MMLOS) standards. The city may adopt MMLOS standards when appropriate.
- Policy 2.3 **Fair share costs.** New development shall pay its fair share of the cost for circulation improvements in accordance with the city's traffic fee mitigation program.
- Policy 2.4 **Right-of-way dedication.** The city may require right-of-way dedication essential to the circulation system in conjunction with any development or annexation. The City shall request the County of Fresno to apply the same requirements in the Clovis planning area.
- Policy 2.5 **Regional and state roadway funding.** Coordinate with the County of Fresno, City of Fresno, Fresno Council of Governments, and Caltrans to fund roadway improvements adjacent to and within the City's Planning Area.
- Policy 2.6 **Vehicle Miles Traveled.** Development projects shall comply with the City's VMT Transportation Analysis Guidelines and provide the appropriate VMT mitigation measures as determined through the analysis.
- Policy 2.7 **VMT Mitigation Fee Program.** Evaluate the feasibility of a VMT mitigation fee program and explore opportunities for establishing an in-lieu mitigation fee to offset VMT impacts from development.

3.1

TRANSPORTATION AND CIRCULATION

Policy 2.8 Partner with local agencies and stakeholders. Partner with other local and regional agencies and stakeholders to explore VMT mitigation measures at the regional scale.

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

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

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

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

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

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

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

## 3.1 TRANSPORTATION AND CIRCULATION

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

### **Transportation Impact Analysis Guidelines**

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

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

### **Clovis Active Transportation Plan**

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

The plan includes the following goals.

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

---

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



## 3.1

## TRANSPORTATION AND CIRCULATION

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

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

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

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

### 3.1.3 IMPACTS AND MITIGATION MEASURES

#### METHODS OF ANALYSIS

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

#### **Travel Demand Model**

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

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

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

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

#### LAND USE

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

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

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

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

3.1

TRANSPORTATION AND CIRCULATION

TABLE 3.1-2: CLOVIS GENERAL PLAN LAND USE

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

SOURCE: KITTELSON & ASSOCIATES, 2022

**VMT Metrics and Thresholds**

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

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

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

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

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

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

## THRESHOLDS OF SIGNIFICANCE

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

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

### Transit, Bicycles, and Pedestrians

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

### Vehicle Miles Traveled

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

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

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

**3.1**

**TRANSPORTATION AND CIRCULATION**

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

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

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

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

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

SOURCE: KITTELSON & ASSOCIATES 2022

**Hazards and Emergency Access**

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

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

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

---

## IMPACTS AND MITIGATION MEASURES

---

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

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

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

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

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

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

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

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

### 3.1 TRANSPORTATION AND CIRCULATION

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

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

**TABLE 3.1-4 VMT RESULTS SUMMARY**

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

SOURCES: FRESNO COG, KITTELSON & ASSOCIATES, 2022

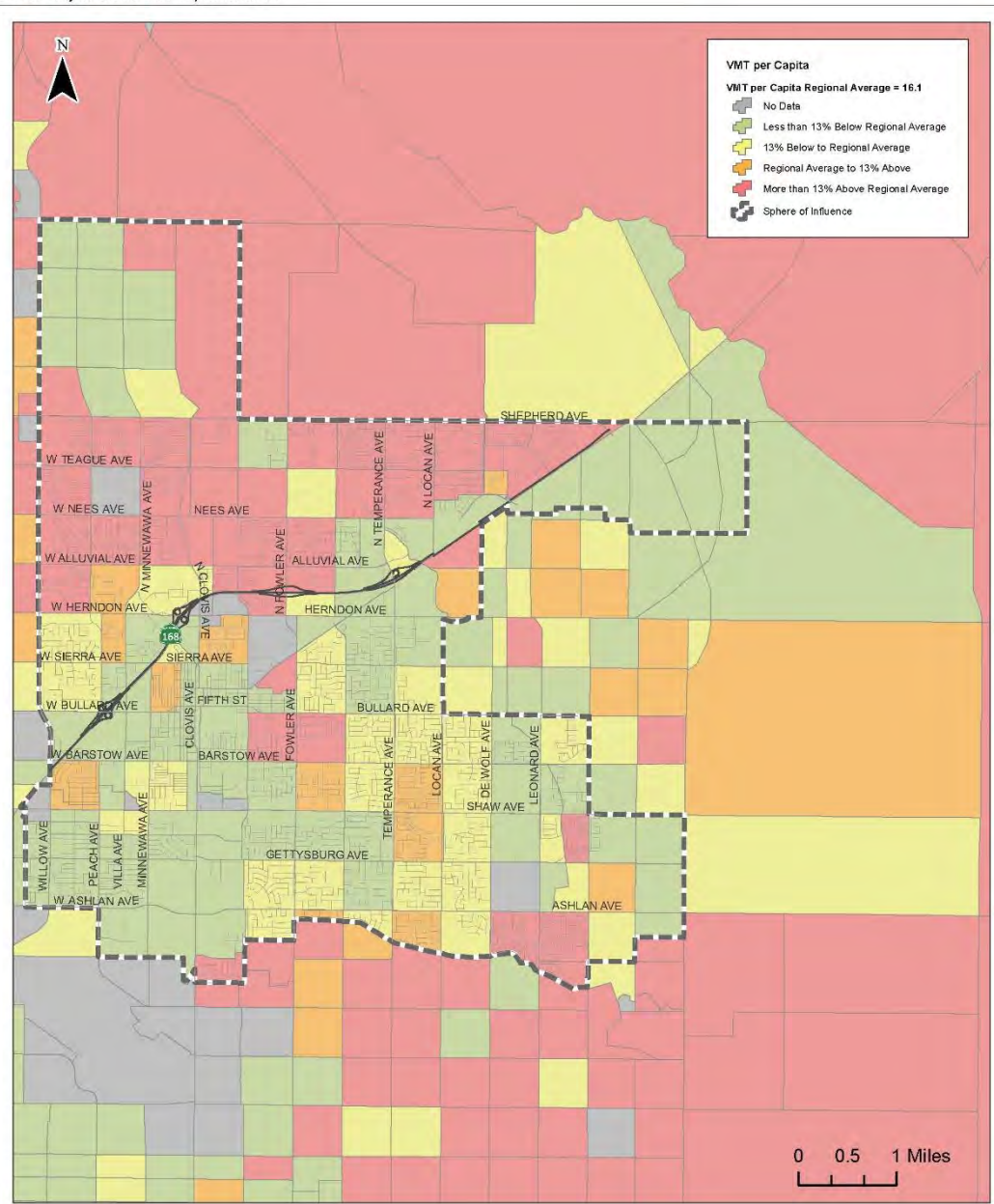
In summary, implementation of the General Plan would result in total citywide VMT per capita above applicable thresholds and total citywide VMT per employee below the threshold. VMT per capita or per employee is largely a function of land use patterns, and integrated transportation infrastructure, with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

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

TRANSPORTATION AND CIRCULATION

3.1

24913 - City of Clovis VMT Implementation



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

**Figure  
3.1-1**

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

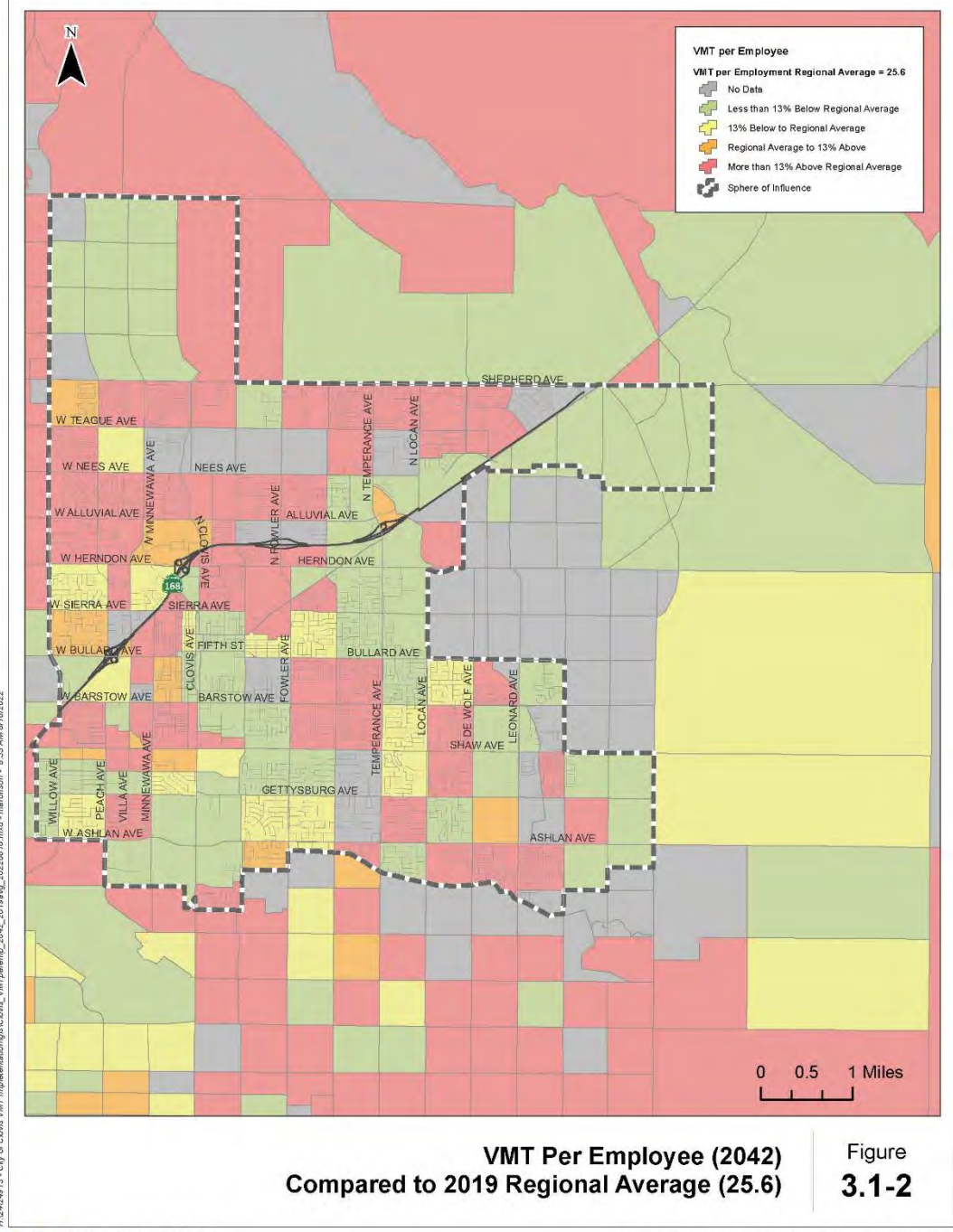


Coordinate System: NAD 1983 StatePlane California IV FIPS 0404 Feet  
Data Source: City of Clovis



# 3.1 TRANSPORTATION AND CIRCULATION

24913 - City of Clovis VMT Implementation



H:\24913 - City of Clovis VMT Implementation\GIS\Clovis\_VMT\perm\_2042\_2019\_avg\_20220616.mxd - marconson - 8:53 AM 6/16/2022



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

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

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

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

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

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

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

## 3.1 TRANSPORTATION AND CIRCULATION

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

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

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

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

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

#### MITIGATION MEASURE(S)

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

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

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

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

## 3.1 TRANSPORTATION AND CIRCULATION

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

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

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

### SIGNIFICANCE AFTER MITIGATION

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

Significance With Mitigation: Significant and unavoidable.

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

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

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

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

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

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

## 3.1 TRANSPORTATION AND CIRCULATION

---

*This Page Intentionally Left Blank.*

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

## 4.1 CUMULATIVE SETTING AND IMPACT ANALYSIS

### INTRODUCTION

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

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

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

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



## 4.0 OTHER CEQA-REQUIRED TOPICS

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

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

### CUMULATIVE SETTING

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

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

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

SOURCE: KITTELSON & ASSOCIATES, 2022

### CUMULATIVE EFFECTS OF THE PROJECT

#### Method of Analysis

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

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

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

### **Project Assumptions**

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

### **Cumulative Impacts**

#### TRANSPORTATION AND CIRCULATION

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

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

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

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

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

## 4.0 OTHER CEQA-REQUIRED TOPICS

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

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

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

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

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

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

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

## 4.2 SIGNIFICANT IRREVERSIBLE EFFECTS

### LEGAL CONSIDERATIONS

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

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

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

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

### Analysis

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

## 4.3 SIGNIFICANT AND UNAVOIDABLE IMPACTS

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

## 4.0 OTHER CEQA-REQUIRED TOPICS

---

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

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

## 5.1 CEQA REQUIREMENTS

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

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

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

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

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

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

## 5.0 ALTERNATIVES TO THE PROPOSED PROJECT

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

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

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

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

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

### PROJECT OBJECTIVES

The following objectives were established for the proposed Project:

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

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

## 5.2 ALTERNATIVES CONSIDERED IN THIS EIR

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

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

### NO PROJECT ALTERNATIVE

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

### POLICY CHANGE ONLY ALTERNATIVE

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

### TIA GUIDELINES ONLY ALTERNATIVE

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

## 5.3 ENVIRONMENTAL ANALYSIS

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



## 5.0 ALTERNATIVES TO THE PROPOSED PROJECT

### NO PROJECT ALTERNATIVE

#### Traffic/Circulation

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

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

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

### POLICY CHANGE ONLY ALTERNATIVE

#### Traffic/Circulation

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

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

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

### TIA GUIDELINES ONLY ALTERNATIVE

#### Traffic/Circulation

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

## ALTERNATIVES TO THE PROPOSED PROJECT

5.0

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

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

### ENVIRONMENTALLY SUPERIOR ALTERNATIVE

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

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

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

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

*This page left intentionally blank.*

CITY OF CLOVIS

---

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

Dave Merchen..... City Planner

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

DE NOVO PLANNING GROUP

---

Steve McMurtry ..... Principal Planner/Project Manager

Elise Carroll .....Senior Planner

Josh Smith .....Senior Planner

William Crenshaw .....Senior Planner

Jennifer De Martino ..... GIS Manager

Ziqian Yin..... Associate Planner

KITTELSON & ASSOCIATES

---

Mike Aronson, PE..... Principal Engineer

Fernando Sotelo, TE.....Associate Engineer

LOZANO SMITH

---

Matthew M. Lear ..... Attorney at Law

*This page left intentionally blank.*

---

**REFERENCES**

---

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

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

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

7.0 REFERENCES

---

*This page left intentionally blank.*

---

NOTICE OF PREPARATION

---



# NOTICE OF PREPARATION AND INITIAL STUDY

FOR THE

## 2014 CLOVIS GENERAL PLAN CIRCULATION ELEMENT UPDATE

(State Clearinghouse No. 2012061069)

APRIL 4, 2022

*Prepared for:*

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

*Prepared by:*

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

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

A Land Use Planning, Design, and Environmental Firm



NOTICE OF PREPARATION AND  
INITIAL STUDY  
FOR THE  
2014 CLOVIS GENERAL PLAN  
CIRCULATION ELEMENT UPDATE  
(State Clearinghouse No. 2012061069)

APRIL 4, 2022

*Prepared for:*

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

*Prepared by:*

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



## NOTICE OF PREPARATION

<p>TO: State Clearinghouse State Responsible Agencies State Trustee Agencies Other Public Agencies  Interested Organizations</p>	<p>FROM: Ricky Caperton, AICP   Deputy City Planner City of Clovis   Planning Division 1033 Fifth Street Clovis, CA 93612 559.324.2347 rcaperton@cityofclovis.com</p>
--	---

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

### EIR CONSULTANT

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

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

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

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

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

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

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

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

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

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

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

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

## TABLE OF CONTENTS

Initial Study Checklist .....	3
Environmental Factors Potentially Affected .....	29
Determination .....	29
Evaluation Instructions .....	30
Evaluation of Environmental Impacts .....	31
Environmental Checklist.....	32
<i>I. AESTHETICS.....</i>	<i>32</i>
<i>II. AGRICULTURE AND FORESTRY RESOURCES.....</i>	<i>33</i>
<i>III. AIR QUALITY.....</i>	<i>34</i>
<i>IV. BIOLOGICAL RESOURCES.....</i>	<i>35</i>
<i>V. CULTURAL RESOURCES.....</i>	<i>37</i>
<i>VI. ENERGY.....</i>	<i>38</i>
<i>VII. GEOLOGY AND SOILS.....</i>	<i>39</i>
<i>VIII. GREENHOUSE GAS EMISSIONS.....</i>	<i>41</i>
<i>IX. HAZARDS AND HAZARDOUS MATERIALS.....</i>	<i>42</i>
<i>X. HYDROLOGY AND WATER QUALITY.....</i>	<i>44</i>
<i>XI. LAND USE AND PLANNING.....</i>	<i>46</i>
<i>XII. MINERAL RESOURCES.....</i>	<i>47</i>
<i>XIII. NOISE.....</i>	<i>48</i>
<i>XIV. POPULATION AND HOUSING.....</i>	<i>49</i>
<i>XV. PUBLIC SERVICES.....</i>	<i>50</i>
<i>XVI. RECREATION.....</i>	<i>51</i>
<i>XVII. TRANSPORTATION.....</i>	<i>52</i>
<i>XVIII. TRIBAL CULTURAL RESOURCES.....</i>	<i>53</i>
<i>XIX. UTILITIES AND SERVICE SYSTEMS.....</i>	<i>54</i>
<i>XX. WILDFIRE.....</i>	<i>55</i>
<i>XXI. MANDATORY FINDINGS OF SIGNIFICANCE.....</i>	<i>56</i>
References .....	57

*This page left intentionally blank.*



## INITIAL STUDY CHECKLIST

### PROJECT TITLE

2014 Clovis General Plan Circulation Element Update (SCH 2012061069)

### LEAD AGENCY NAME AND ADDRESS

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

### CONTACT PERSON

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

### PROJECT LOCATION AND SETTING

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

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

### PROJECT BACKGROUND

#### *TRANSPORTATION PLANNING CHANGES*

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

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

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

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

### *CITY GUIDELINES AND POLICY CHANGES*

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

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

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

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

#### **Project Screening**

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

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

#### *Small Projects*

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

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

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

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

### *Affordable Housing*

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

#### *Consistency with RTP/SCS*

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

### **Circulation Element Update**

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

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

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

## PROJECT OBJECTIVES

The following objectives were established for the Proposed Project:

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

## PROJECT DESCRIPTION

### *FOCUSED UPDATE*

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

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

### *GOALS AND POLICIES*

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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



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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

### REQUESTED ENTITLEMENTS AND OTHER APPROVALS

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

#### *CITY OF CLOVIS*

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

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

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

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

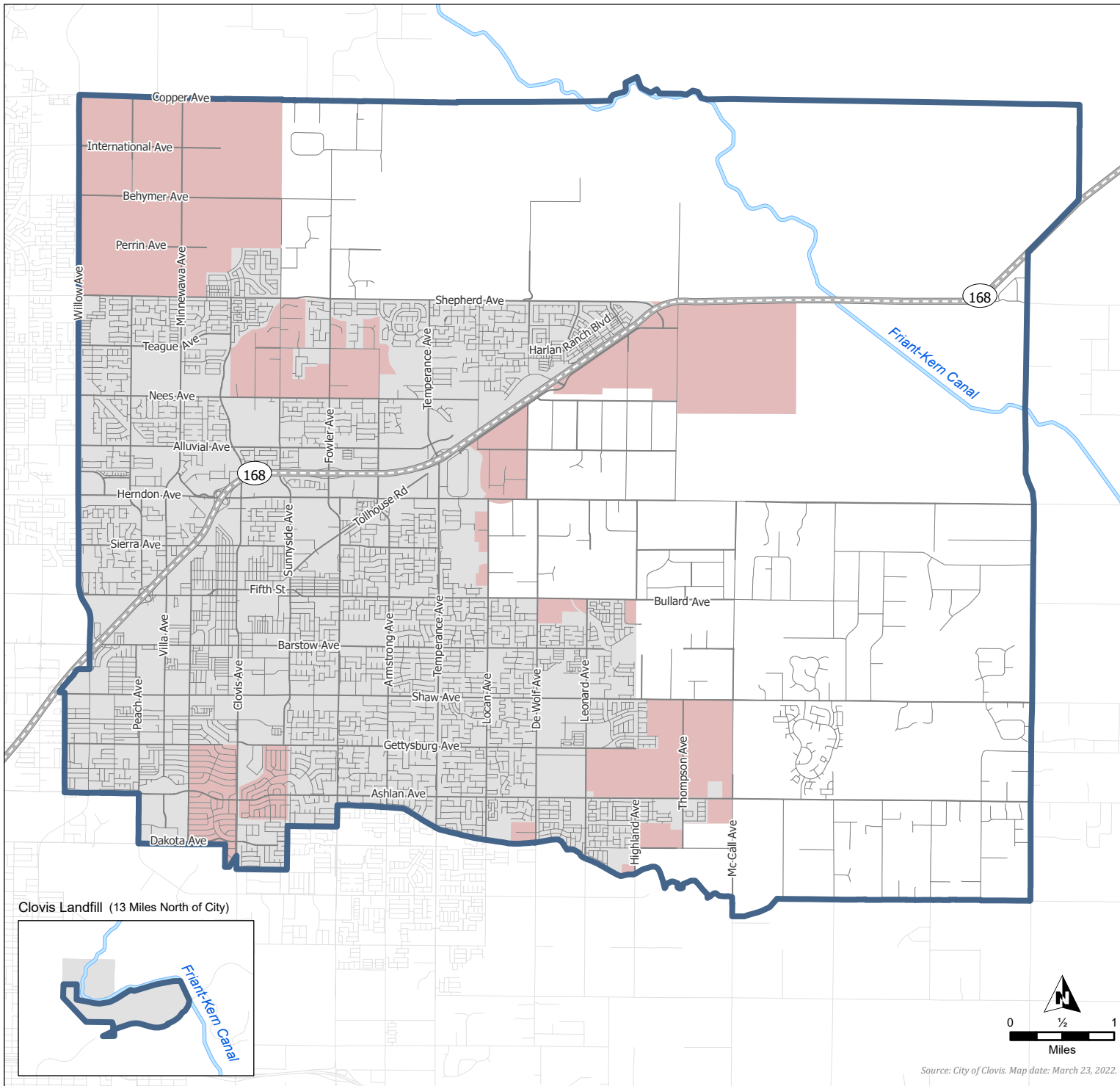
- Development Agreements;
- Property rezoning consistent with the General Plan;
- Permit issuances and other approvals necessary for public and private development projects; and
- Issuance of permits and other approvals necessary for implementation of the General Plan.

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

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

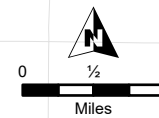
*This page left intentionally blank.*

**Figure 1  
Clovis Planning Area**



**LEGEND**

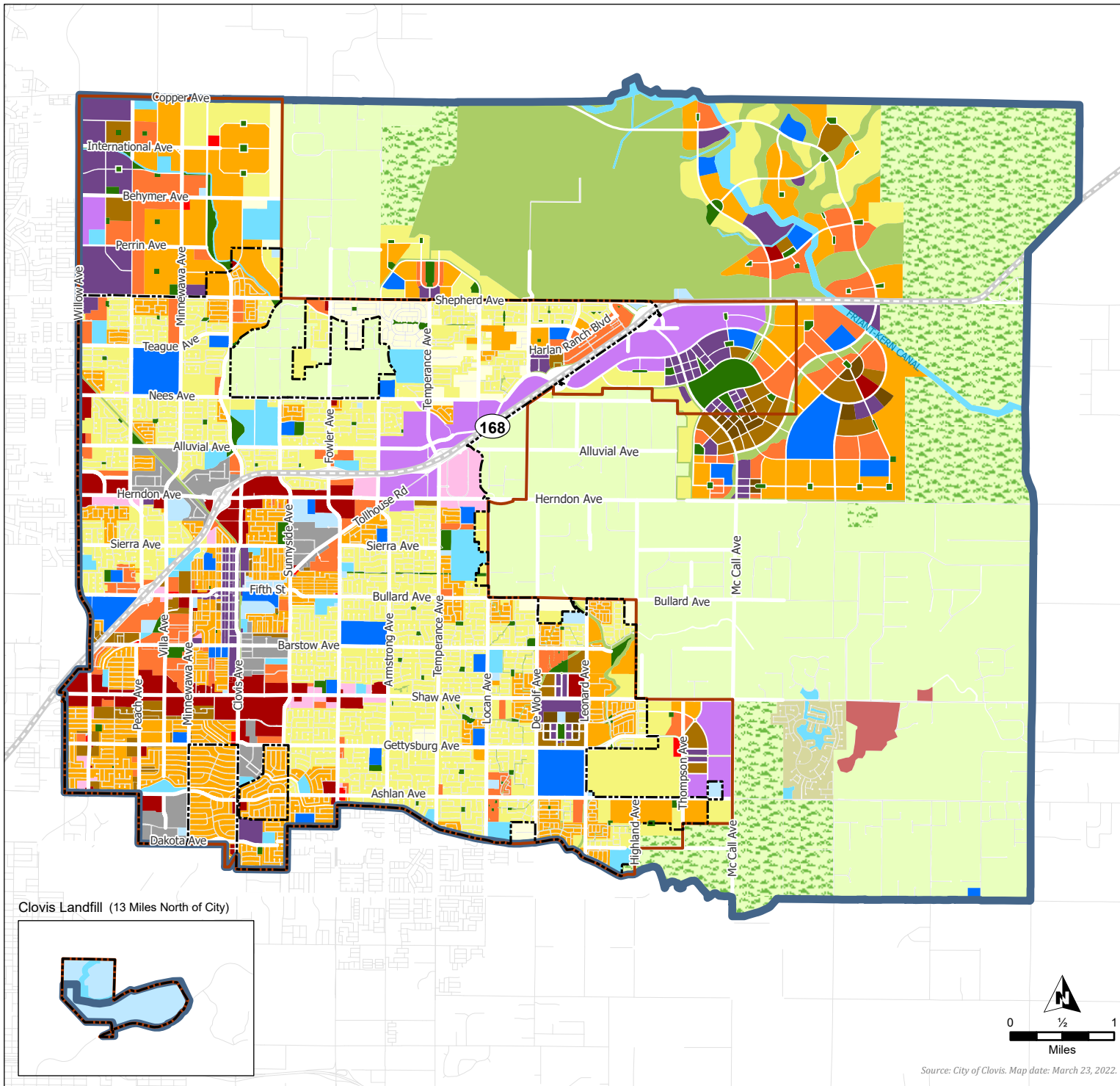
- Clovis City Limits
- Clovis Sphere of Influence
- Planning Area Boundary



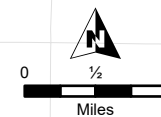
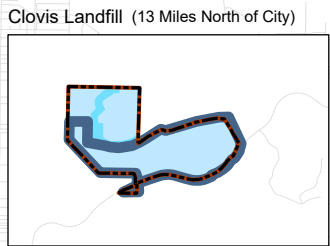
Source: City of Clovis. Map date: March 23, 2022.

*This page left intentionally blank.*

**Figure 2  
Land Use Diagram**



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

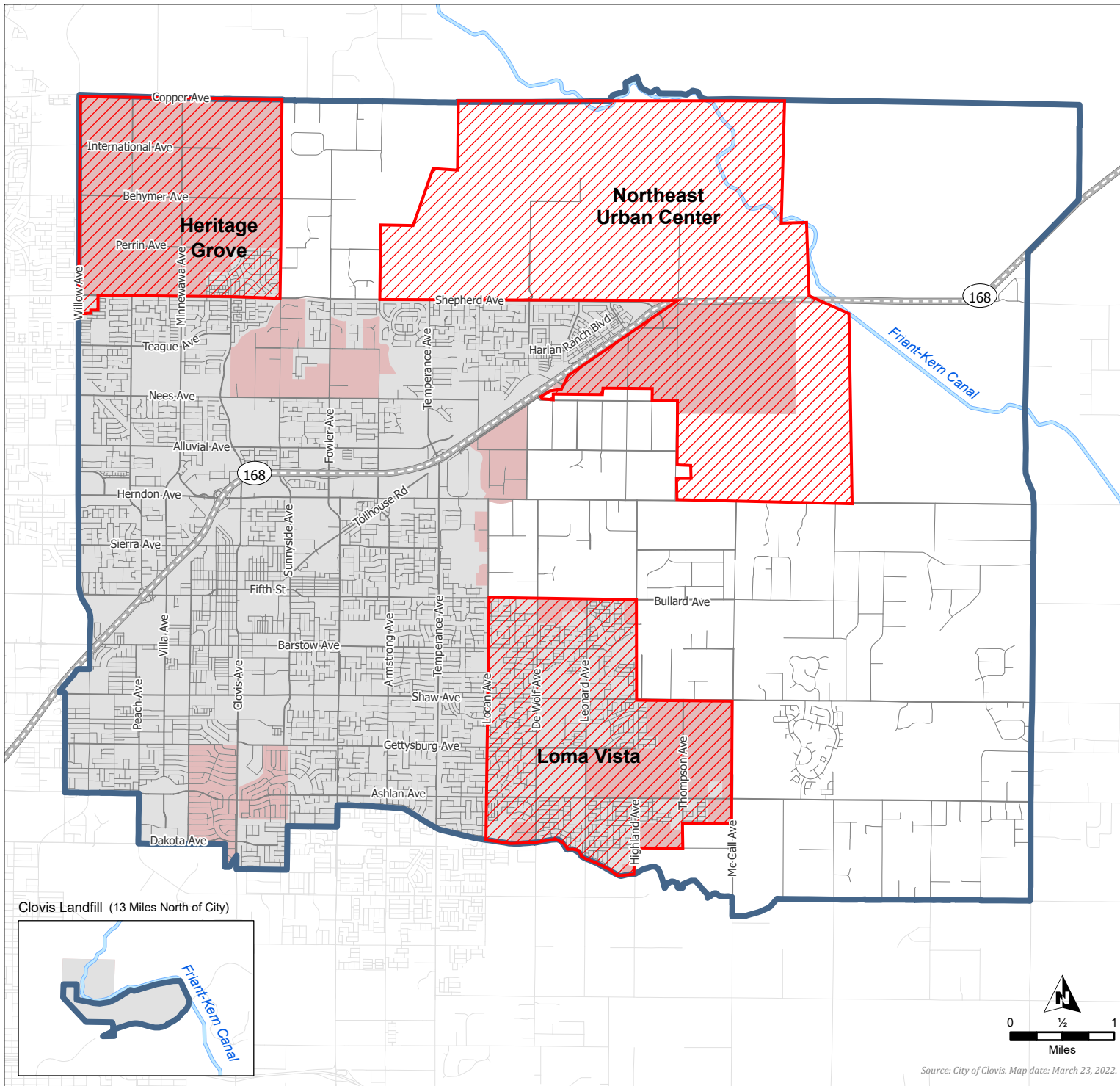


Source: City of Clovis. Map date: March 23, 2022.

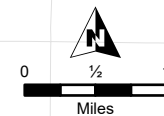
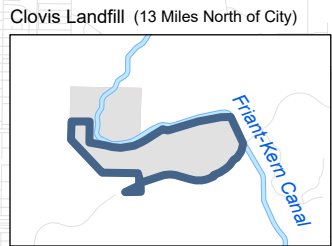
*This page left intentionally blank.*



**Figure 3  
Urban Centers**



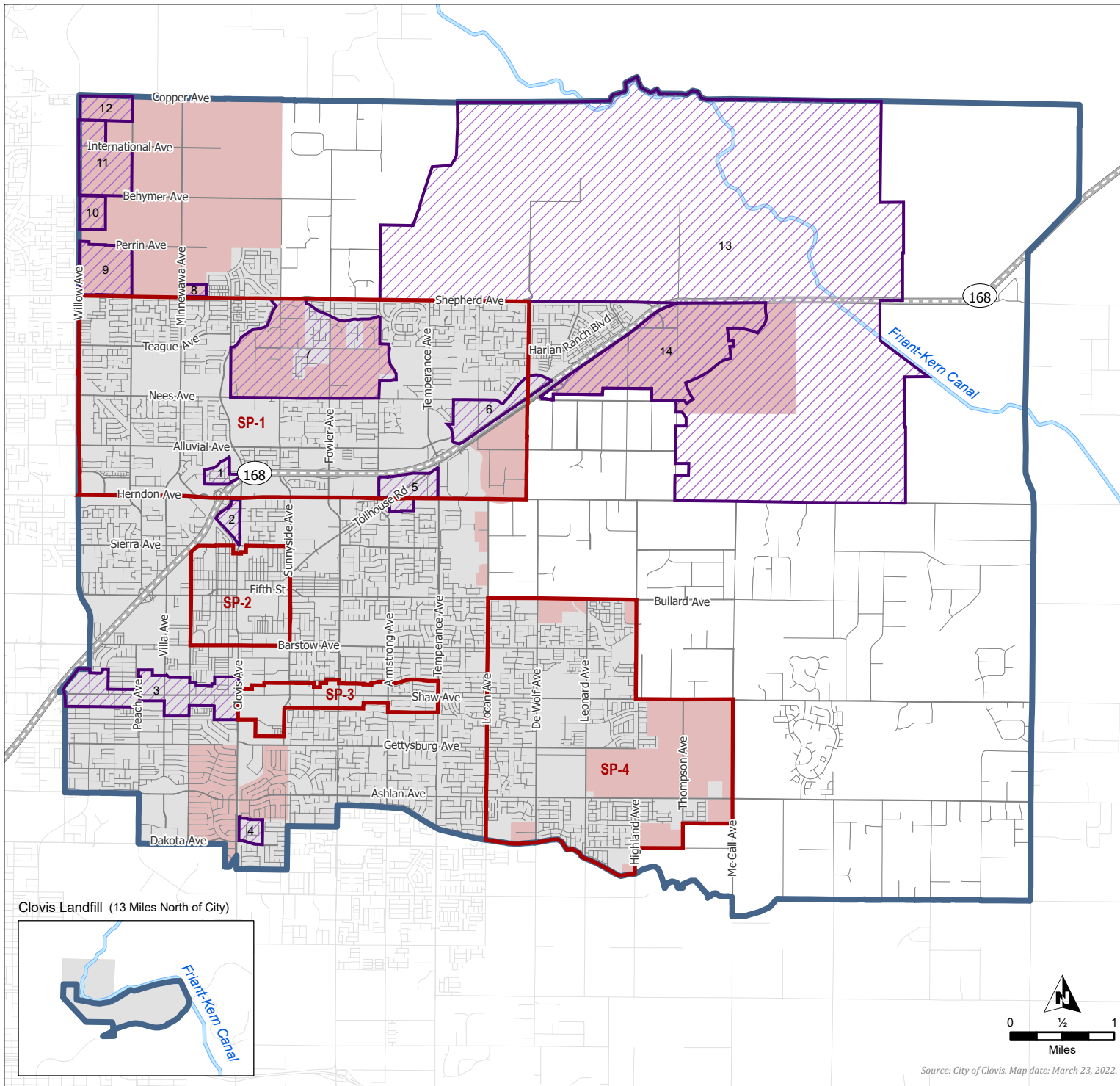
- LEGEND**
- Urban Centers
  - Clovis City Limits
  - Clovis Sphere of Influence
  - Planning Area Boundary



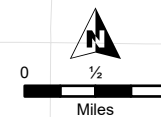
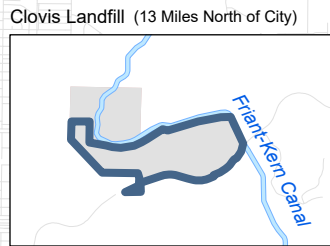
Source: City of Clovis. Map date: March 23, 2022.

*This page left intentionally blank.*

**Figure 4  
Focus Area**



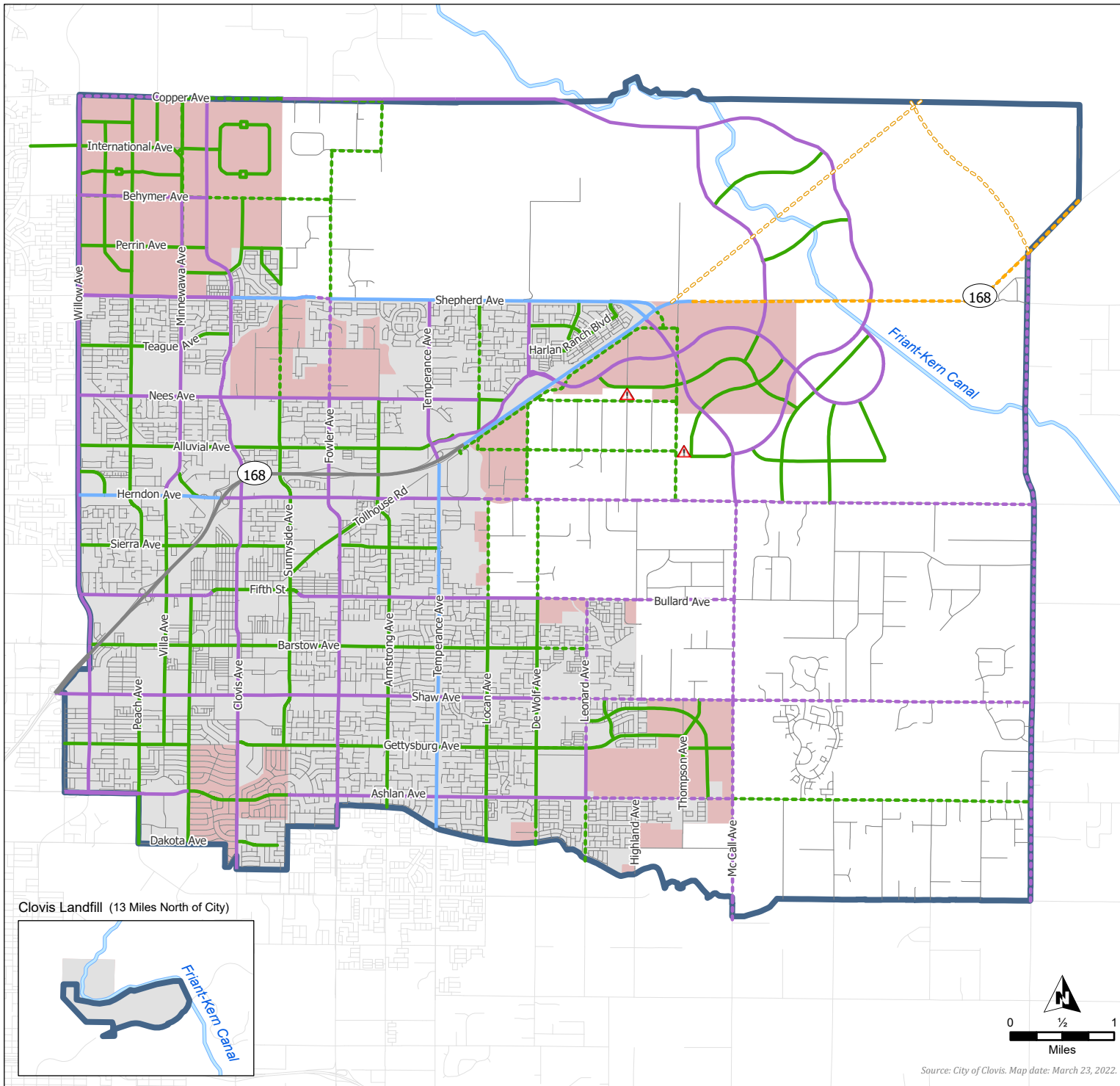
- LEGEND**
- Specific Plan Areas
  - Focus Areas
  - Clovis City Limits
  - Clovis Sphere of Influence
  - Planning Area Boundary



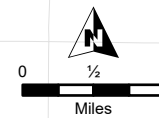
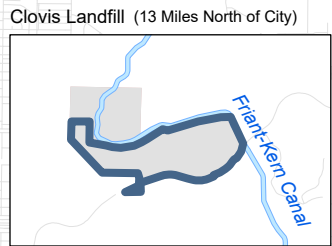
Source: City of Clovis. Map date: March 23, 2022.

*This page left intentionally blank.*

**Figure 5  
Circulation Diagram**



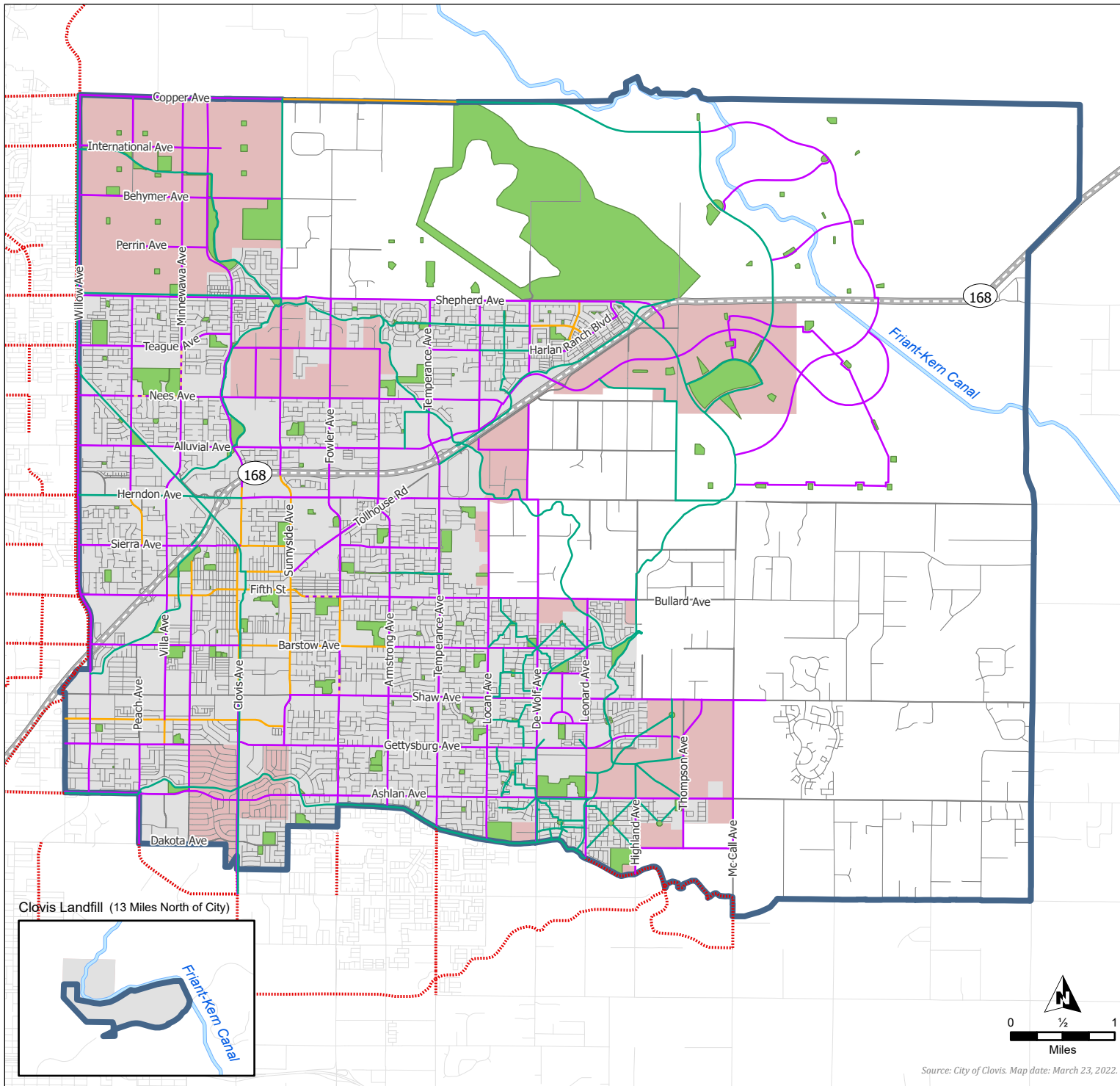
- LEGEND**
- Freeway
  - - - Conceptual State Highway
  - - - State Highway
  - Expressway
  - Arterial
  - - - Rural County Arterial
  - Collector
  - - - Rural County Collector
  - Local
  - Clovis City Limits
  - Clovis Sphere of Influence
  - Planning Area Boundary
  - ▲ Emergency Access Only



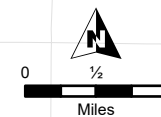
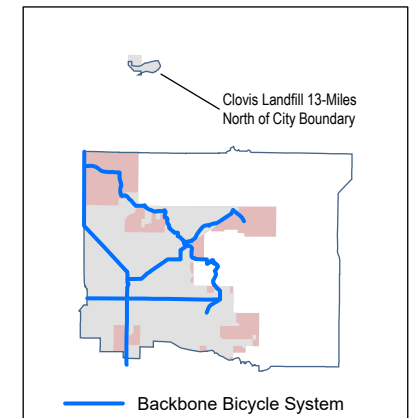
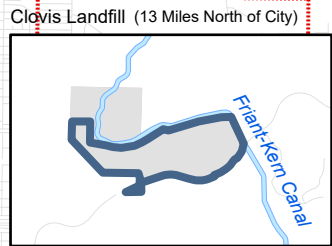
Source: City of Clovis. Map date: March 23, 2022.

*This page left intentionally blank.*

**Figure 6  
Bicycle and Trails System**



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

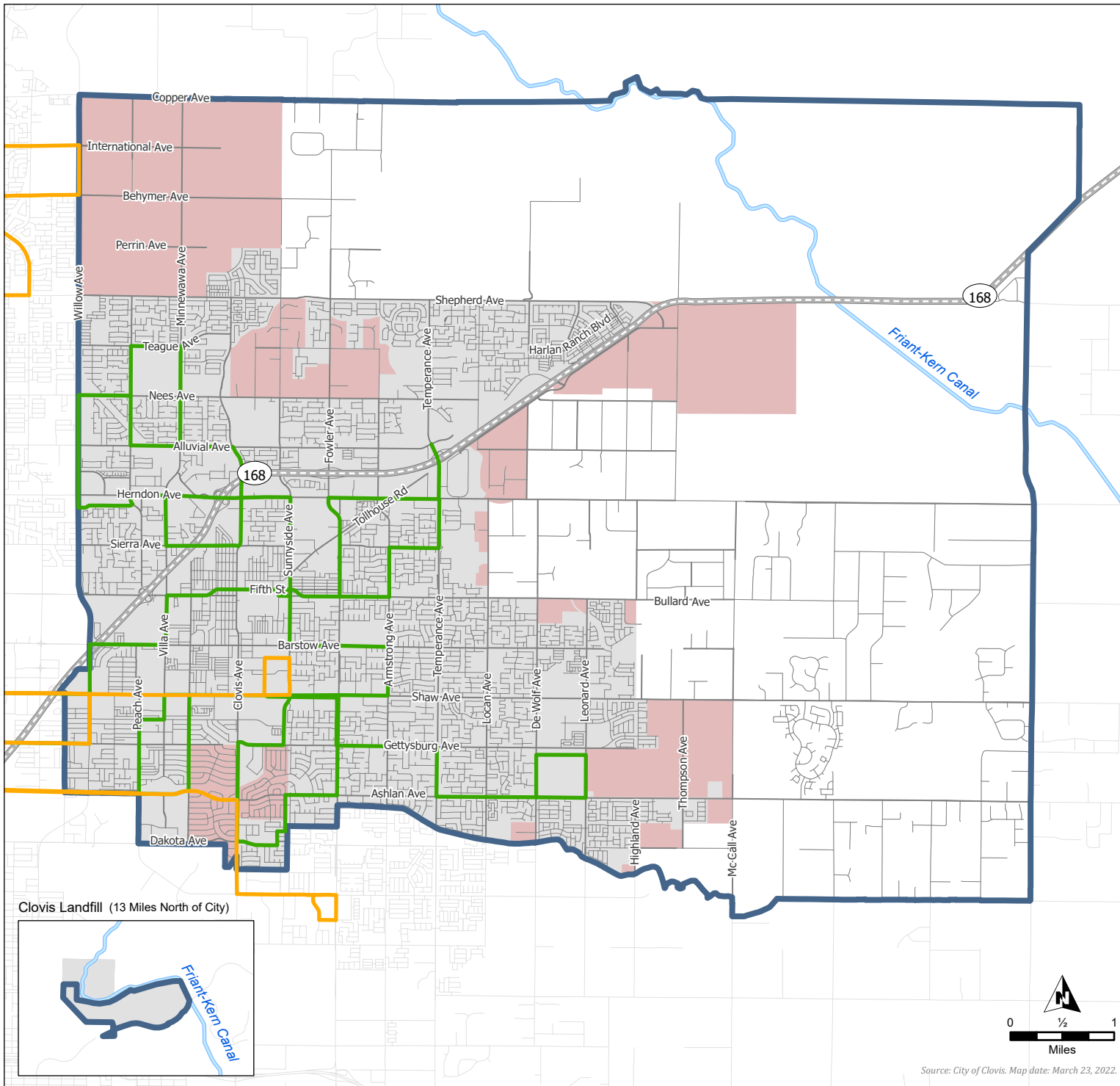


Source: City of Clovis. Map date: March 23, 2022.

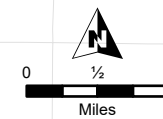
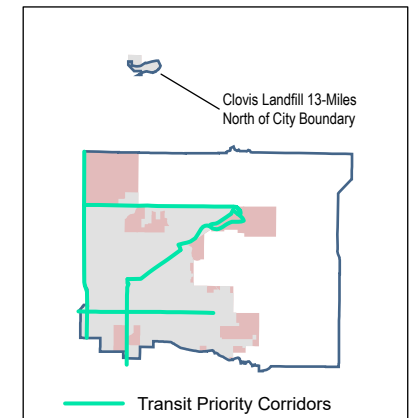
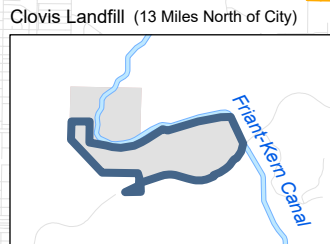
*This page left intentionally blank.*



**Figure 7  
Transit System**



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



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

*This page left intentionally blank.*

## ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

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

## DETERMINATION

On the basis of this initial evaluation:

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

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

## EVALUATION INSTRUCTIONS

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

## EVALUATION OF ENVIRONMENTAL IMPACTS

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

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

## ENVIRONMENTAL CHECKLIST

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

### I. AESTHETICS

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

#### *Responses to Checklist Questions*

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

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

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

## II. AGRICULTURE AND FORESTRY RESOURCES

<i>Would the project:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				X
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?				X
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 1222(g)) or timberland (as defined in Public Resources Code section 4526)?				X
d) Result in the loss of forest land or conversion of forest land to non-forest use?				X
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?				X

### *Responses to Checklist Questions*

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

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

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

### III. AIR QUALITY

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

#### *Responses to Checklist Questions*

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

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

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



*IV. BIOLOGICAL RESOURCES*

<i>Would the project:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?				X
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?				X
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				X
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?				X
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				X
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?				X

*Responses to Checklist Questions*

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

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

The City's policy changes will narrowly affect circulation and transportation topics, but will not have a direct or indirect effect on this CEQA topic. Instead, the City's policy changes would result in no anticipated environmental changes to this CEQA topic when compared to the environmental effects discussed under the certified EIR. As such, this CEQA topic has been adequately analyzed in the certified

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

## V. CULTURAL RESOURCES

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

### *Responses to Checklist Questions*

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

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

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

*VI. ENERGY*

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

*Responses to Checklist Questions*

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

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

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

## VII. GEOLOGY AND SOILS

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

### *Responses to Checklist Questions*

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

CEQA Guidelines Section 15168 provides that the focus of a supplemental analysis on new information can be narrowly on new effects, which had not been considered before, and that if there are no effects on a

topic beyond those disclosed in the certified EIR, no further environmental review of that topic would be required.

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

**VIII. GREENHOUSE GAS EMISSIONS**

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

*Responses to Checklist Questions*

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

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

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

**IX. HAZARDS AND HAZARDOUS MATERIALS**

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

*Responses to Checklist Questions*

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

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

The City’s policy changes will narrowly affect circulation and transportation topics, but will not have a direct or indirect effect on this this CEQA topic. Instead, the City’s policy changes would result in no anticipated environmental changes to this CEQA topic when compared to the environmental effects



discussed under the certified EIR. As such, this CEQA topic has been adequately analyzed in the certified EIR pursuant to applicable legal standards, and does not warrant further environmental review in the supplemental analysis. The proposed project would have **No Impact** relative to this topic.

**X. HYDROLOGY AND WATER QUALITY**

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

*Responses to Checklist Questions*

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

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

The City’s policy changes will narrowly affect circulation and transportation topics, but will not have a direct or indirect effect on this CEQA topic. Instead, the City’s policy changes would result in no anticipated environmental changes to this CEQA topic when compared to the environmental effects

discussed under the certified EIR. As such, this CEQA topic has been adequately analyzed in the certified EIR pursuant to applicable legal standards, and does not warrant further environmental review in the supplemental analysis. The proposed project would have **No Impact** relative to this topic.

*XI. LAND USE AND PLANNING*

<i>Would the project:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Physically divide an established community?				X
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?				X

*Responses to Checklist Questions*

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

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

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

**XII. MINERAL RESOURCES**

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

*Responses to Checklist Questions*

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

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

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

**XIII. NOISE**

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

*Responses to Checklist Questions*

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

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

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

**XIV. POPULATION AND HOUSING**

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

*Responses to Checklist Questions*

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

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

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

**XV. PUBLIC SERVICES**

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

*Responses to Checklist Questions*

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

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

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



*XVI. RECREATION*

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

*Responses to Checklist Questions*

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

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

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

*XVII. TRANSPORTATION*

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

*Existing Setting*

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

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

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

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

**XVIII. TRIBAL CULTURAL RESOURCES**

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

*Responses to Checklist Questions*

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

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

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

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

<b><i>Would the project:</i></b>	<b><i>Potentially Significant Impact</i></b>	<b><i>Less Than Significant with Mitigation Incorporation</i></b>	<b><i>Less Than Significant Impact</i></b>	<b><i>No Impact</i></b>
a) Require or result in the relocation or construction of new or expanded water, wastewater or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?				X
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?				X
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the projects projected demand in addition to the providers existing commitments?				X
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?				X
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?				X

***Responses to Checklist Questions***

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

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

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

**XX. WILDFIRE**

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

*Responses to Checklist Questions*

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

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

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

**XXI. MANDATORY FINDINGS OF SIGNIFICANCE**

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

*Responses to Checklist Questions*

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

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

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

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

## REFERENCES

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

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

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

---

NOP COMMENTS

---



## Joyce Roach

---

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

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

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

---

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

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

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

Greetings,

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

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

City of Clovis Council Chamber

1033 Fifth Street

Clovis, CA 93612

Date: Wednesday, April 27, 2022

Time: 5:30 pm to 6:30pm

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



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

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



**Jared Blumenfeld**  
Secretary for  
Environmental Protection



## Department of Toxic Substances Control

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

AGENDA ITEM NO. 9.



**Gavin Newsom**  
Governor

### SENT VIA ELECTRONIC MAIL

April 18, 2022

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

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

Dear Mr. Caperton:

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

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

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

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

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

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

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

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

Sincerely,



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

cc: (via email)

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

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



# County of Fresno

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

May 12, 2022

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

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

Dear Ricky Caperton:

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

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

#### Design:

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

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

#### Environmental Health:

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

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

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

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

Sincerely,



Marissa Parker, Planner  
Development Services and Capital Projects Division

DR:mp,cwm  
G:\4360Devs&Plan\PROJSEC\PROJDOCS\Environmental\OAR\City of Clovis\RO304 - Home Place\RESPONSE LETTER OAR - HOME PLACE.docx



# County of Fresno

## DEPARTMENT OF PUBLIC HEALTH

May 4, 2022

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

LU0021730  
2600

Dear Mr. Caperton:

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

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

### Hazards and Hazardous Materials

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

### Hydrology and Water Quality

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

### Noise

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

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

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

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

(559) 600-3271 ☐ FAX (559) 455-4646

The County of Fresno is an Equal Employment Opportunity Employer

[www.co.fresno.ca.us](http://www.co.fresno.ca.us) ☐ [www.fcdph.org](http://www.fcdph.org)



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

Reviewed By:

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

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

KT

Deep Sidhu- Environmental Health Division

STATE OF CALIFORNIA

Gavin Newsom, Governor

## NATIVE AMERICAN HERITAGE COMMISSION



April 15, 2022

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

CHAIRPERSON  
**Laura Miranda**  
Luiseño

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

VICE CHAIRPERSON  
**Reginald Pagaling**  
Chumash

Dear Mr. Caperton:

PARLIAMENTARIAN  
**Russell Attebery**  
Karuk

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

SECRETARY  
**Sara Dutschke**  
Miwok

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

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

COMMISSIONER  
**Isaac Bojorquez**  
Ohlone-Costanoan

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

COMMISSIONER  
**Wayne Nelson**  
Luiseño

COMMISSIONER  
**Stanley Rodriguez**  
Kumeyaay

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

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

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

NAHC HEADQUARTERS  
1550 Harbor Boulevard  
Suite 100  
West Sacramento,  
California 95691  
(916) 373-3710  
[nahc@nahc.ca.gov](mailto:nahc@nahc.ca.gov)  
[NAHC.ca.gov](http://NAHC.ca.gov)

## AB 52

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

1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project: Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:
  - a. A brief description of the project.
  - b. The lead agency contact information.
  - c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
  - d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).
  
2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report: A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1(b)).
  - a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).
  
3. Mandatory Topics of Consultation If Requested by a Tribe: The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:
  - a. Alternatives to the project.
  - b. Recommended mitigation measures.
  - c. Significant effects. (Pub. Resources Code §21080.3.2 (a)).
  
4. Discretionary Topics of Consultation: The following topics are discretionary topics of consultation:
  - a. Type of environmental review necessary.
  - b. Significance of the tribal cultural resources.
  - c. Significance of the project's impacts on tribal cultural resources.
  - d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).
  
5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process: With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).
  
6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document: If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:
  - a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
  - b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

**7. Conclusion of Consultation:** Consultation with a tribe shall be considered concluded when either of the following occurs:

- a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
- b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).

**8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document:** Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).

**9. Required Consideration of Feasible Mitigation:** If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).

**10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:**

- a. Avoidance and preservation of the resources in place, including, but not limited to:
  - i. Planning and construction to avoid the resources and protect the cultural and natural context.
  - ii. Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
- b. Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
  - i. Protecting the cultural character and integrity of the resource.
  - ii. Protecting the traditional use of the resource.
  - iii. Protecting the confidentiality of the resource.
- c. Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
- d. Protecting the resource. (Pub. Resource Code §21084.3 (b)).
- e. Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
- f. Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).

**11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource:** An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:

- a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
- b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
- c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

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

SB 18

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

Some of SB 18's provisions include:

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

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

#### NAHC Recommendations for Cultural Resources Assessments

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

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

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

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

Sincerely,

*Cameron Vela*

Cameron Vela  
Cultural Resources Analyst

cc: State Clearinghouse



# Fresno Metropolitan Flood Control District

*Capturing Stormwater since 1956*

File 170.11  
400.11  
410.10

May 4, 2022

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

Dear Ricky,

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

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

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

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

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

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

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

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

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

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



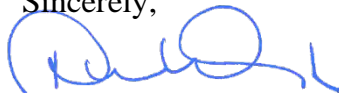
**City of Clovis Planning Division**  
**Notice of Preparation –**  
**2014 Clovis General Plan Circulation Element Update**  
**May 4, 2022**  
**Page 3**

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

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

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

Sincerely,

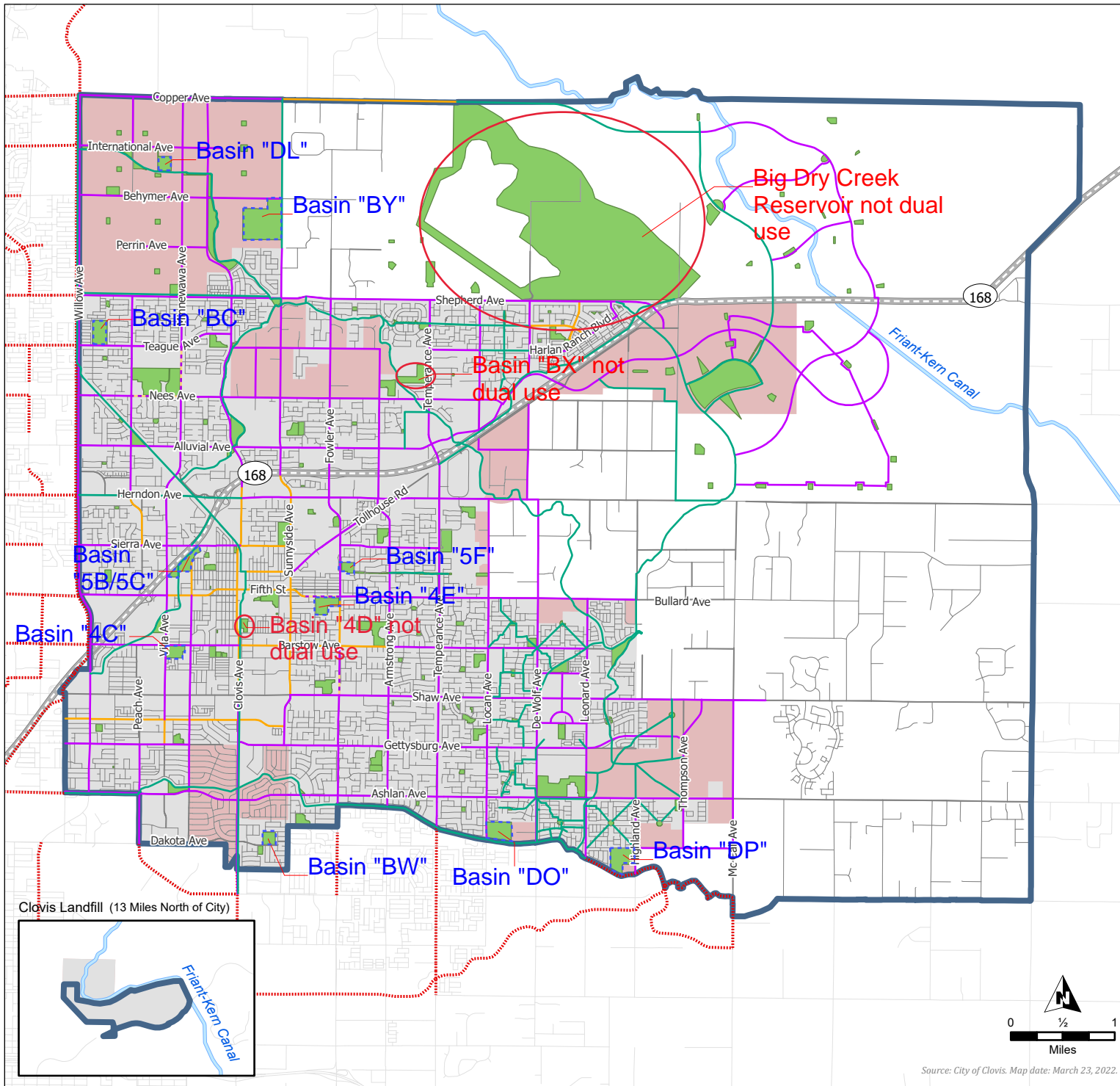


Denise Wade  
Master Plan and Special Projects Manager

DW/lrl

Attachment

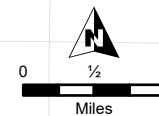
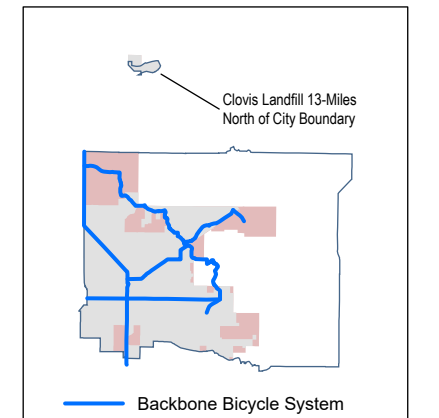
**Figure 6  
Bicycle and Trails System**



**LEGEND**

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

  FMFCD Dual Use Basin Facilities



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

## California Department of Transportation

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



May 4, 2022

FRE

IS – Initial Study

NOP – 2014 Clovis General Plan Circulation Update

<https://ld-igr-gts.dot.ca.gov/district/6/report/26354>

### SENT VIA EMAIL

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

Dear Mr. Caperton:

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

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

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

transporting people between residential neighborhoods and goods and services.

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

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

Sincerely,



DAVID PADILLA, Branch Chief  
Transportation Planning – North



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

GAVIN NEWSOM  
 CHARLTON H. BONHAM  
 AGENDA ITEM NO. 9.



June 17, 2022

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

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

Dear Mr. Caperton:

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

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

## CDFW ROLE

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

---

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

Ricky Caperton, Deputy City Planner  
City of Clovis  
June 17, 2022  
Page 2

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

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

## PROJECT DESCRIPTION SUMMARY

**Proponent:** City of Clovis

**Objective:** The City of Clovis is preparing a focused update to its existing General Plan. The proposed Project concentrates on policy changes to the Circulation Element only, and does not change any other Element of the General Plan. The proposed Project also includes adoption of the Transportation Impact Analysis Guidelines, which are supportive of the Circulation Element. The focused General Plan Update does not affect land uses or development patterns, and does not result in any physical development. The key components of the focused General Plan Update include revisions to the goals and policies in the Circulation Element.

**Location:** The City of Clovis (City) is in the central portion of Fresno County, approximately 6.5-miles northeast of the City of Fresno downtown area. The City is surrounded by portions of unincorporated Fresno County to the north, east, and south and by the City of Fresno to the west and southwest.

At the local level, the Plan Area is generally bounded by Copper Avenue on the north, Willow Avenue on the west, Academy Avenue on the east, and Shields Avenue on the south. State Route 168 (SR-168) bisects the City from the southwest to the northeast.

**Timeframe:** None given.

## COMMENTS AND RECOMMENDATIONS

The NOP indicates that the Environmental Impact Report (EIR) for the Project will consider potential environmental effects of the proposed Project to determine the level of significance of the environmental effect, and will analyze these potential effects to the detail necessary

Ricky Caperton, Deputy City Planner  
City of Clovis  
June 17, 2022  
Page 3

to make a determination on the level of significance. The EIR will also identify and evaluate alternatives to the proposed project.

When an EIR is prepared, the specifics of mitigation measures may be deferred, provided the lead agency commits to mitigation and establishes performance standards for implementation. Special-status plant and animal species have been documented in the Project area per the California Natural Diversity Database (CNDDDB), these include, but are not limited to, the State and Federally threatened California tiger salamander (*Ambystoma californiense*), the State endangered and Federally threatened San Joaquin adobe sunburst (*Pseudobahia peirsonii*), the State threatened Swainson's hawk (*Buteo swainsoni*), the State threatened tricolored blackbird (*Agelaius tricolor*), the State and Federally endangered Hartweg's golden sunburst (*Pseudobahia bahiifolia*) and California jewelflower (*Caulanthus californicus*), the State endangered and Federally threatened San Joaquin Valley Orcutt grass (*Orcuttia inaequalis*), the State endangered and Federally threatened succulent owl's clover (*Castilleja campestris var. succulenta*), the Federally threatened vernal pool fairy shrimp (*Branchinecta lynchi*), and the State species of special concern burrowing owl (*Athene cunicularia*), western pond turtle (*Actinemys marmorata*), American badger (*Taxidea taxus*) and western spadefoot toad (*Spea hammondi*). While this list may not include all special-status species present in or near the Project area, it does provide a robust source of information as to which species could potentially be impacted by vegetation and/or ground disturbance. CDFW recommends the EIR prepared for the Project analyze potential impacts to these species and provide measurable mitigation measures that, as needed, will reduce impacts to less than significant levels. More information on survey and monitoring protocols for sensitive species can be found at CDFW's website (<https://www.wildlife.ca.gov/Conservation/Survey-Protocols>).

CDFW also recommends consulting with the United States Fish and Wildlife Service (USFWS) on potential impacts to Federally listed species including, but not limited to, California tiger salamander, Hartweg's golden sunburst, succulent owl's clover, California jewelflower, and vernal pool invertebrates. Take under the Federal Endangered Species Act (FESA) is more broadly defined than CESA; take under FESA also includes significant habitat modification or degradation that could result in death or injury to a listed species by interfering with essential behavioral patterns such as breeding, foraging, or nesting. Consultation with the USFWS in order to comply with FESA is advised well in advance of any ground disturbing activities.

In addition to potential species impacts, it is likely that some Project activities that will be subject to CDFW's regulatory authority pursuant Fish and Game Code section 1600 et seq. If a Lake or Streambed Alteration Agreement (LSAA) is needed, CDFW is required to comply with CEQA in the issuance or the renewal of a LSAA. Therefore, for efficiency in environmental compliance, we recommend that any potential lake or stream disturbance that may result from Project activities be described, and mitigation for the disturbance be developed as part of the EIR. This will reduce the need for the Department to require extensive additional environmental review for a LSAA in the future. If inadequate, or no environmental review, has occurred, for the Project activities that are subject to notification

Ricky Caperton, Deputy City Planner  
City of Clovis  
June 17, 2022  
Page 4

under Fish and Game Code section 1602, CDFW will not be able to issue the Final LSAA until CEQA analysis for the project is complete. This may lead to considerable Project delays. Waterways present within the City of Clovis General Plan Update boundary include, but may not be limited to, Dog Creek, the Friant/Kern Canal, Dry Creek, and Enterprise Canal.

CDFW is available to meet with you ahead of DEIR preparation to discuss potential impacts and possible mitigation measures for some or all of the resources that may be analyzed in the EIR. If you have any questions, please contact Kelley Nelson, Environmental Scientist, at the address provided on this letterhead, by telephone at (559) 580-3194, or by electronic mail at [Kelley.Nelson@wildlife.ca.gov](mailto:Kelley.Nelson@wildlife.ca.gov).

Sincerely,

DocuSigned by:  
  
96D42C58E092466...

Valerie Cook  
Acting Regional Manager

cc: Regional Water Quality Control Board  
Central Valley Region  
1685 "E" Street  
Fresno, California 93706-2020

United States Army Corps of Engineers  
San Joaquin Valley Office  
1325 "J" Street, Suite #1350  
Sacramento, California 95814-2928

ec: California Department of Fish and Wildlife:  
LSA Program; [R4LSA@wildlife.ca.gov](mailto:R4LSA@wildlife.ca.gov)

United States Fish and Wildlife Service  
Patricia Cole; [Patricia\\_Cole@fws.gov](mailto:Patricia_Cole@fws.gov)



Ricky Caperton, Deputy City Planner  
City of Clovis  
June 17, 2022  
Page 5

## **LITERATURE CITED**

California Department of Fish and Wildlife. 2022. Biogeographic Information and Observation System (BIOS). <https://www.wildlife.ca.gov/Data/BIOS>.

SUPPLEMENTAL  
FINAL ENVIRONMENTAL IMPACT REPORT

FOR THE

2014 CLOVIS GENERAL PLAN  
CIRCULATION ELEMENT UPDATE

(State Clearinghouse No. 2012061069)

SEPTEMBER 2, 2022

*Prepared for:*

City of Clovis | Planning Division  
1033 Fifth Street  
Clovis, CA 93612  
559.324.2346

*Prepared by:*

De Novo Planning Group  
1020 Suncastr Lane, Suite 106  
El Dorado Hills, CA 95762  
(916) 812-7927

D e N o v o P l a n n i n g G r o u p

A Land Use Planning, Design, and Environmental Firm



SUPPLEMENTAL  
FINAL ENVIRONMENTAL IMPACT REPORT

FOR THE

2014 CLOVIS GENERAL PLAN  
CIRCULATION ELEMENT UPDATE

(State Clearinghouse No. 2012061069)

SEPTEMBER 2, 2022

*Prepared for:*

City of Clovis  
Contact: Dave Merchen, City Planner  
Planning Division  
1033 Fifth Street  
Clovis, California 93612  
559.324.2346

*Prepared by:*

De Novo Planning Group  
1020 Suncast Lane, Suite 106  
El Dorado Hills, CA 95762  
(916) 812-7927



TABLE OF CONTENTS TOC

FINAL EIR

<b>Chapter</b>	<b>Page Number</b>
Executive Summary.....	ES-1
1.0 Introduction .....	1.0-1
1.1 Purpose and Intended Uses of the EIR .....	1.0-1
1.2 Environmental Review Process.....	1.0-6
1.3 Organization of the Final EIR .....	1.0-8
2.0 Comments on Draft EIR and Responses .....	2.0-1
2.1 Introduction .....	2.0-1
2.2 List of Commenters.....	2.0-1
2.3 Comments and Responses.....	2.0-2
3.0 Revisions .....	3.0-1
3.1 Revisions to the Draft EIR .....	3.0-1
4.0 Final Mitigation Monitoring and Reporting Program .....	4.0-1
4.1 Mitigation Monitoring and Reporting Program.....	4.0-1
 <b>Tables</b>	 <b>Page Number</b>
Table 2.0-1: List of Commenters on Draft EIR .....	2.0-1
Table 4.0-1: Mitigation Monitoring and Reporting Program.....	4.0-2

*This page left intentionally blank.*

## INTRODUCTION

In response to Senate Bill 743 (SB 743), the City of Clovis (City) initiated efforts to establish a framework for analyzing transportation impacts that was both consistent with the State's mandates, and City policy. This effort led to the development of the Interim Transportation Impact Analysis Guidelines (adopted July 20, 2020, Resolution 20-93), which provides guidance to City staff, applicants, and consultants on the requirements to evaluate transportation impacts for projects in the city for the purpose of determining impacts under the California Environmental Quality Act (CEQA).

As the City developed the Interim Transportation Impact Analysis Guidelines in response to the requirements of SB 743, it became evident that the City's 2014 General Plan Circulation Element needed to be updated to be in alignment with the State's mandates, and the Interim Transportation Impact Analysis Guidelines. City staff then embarked on an update to the Circulation Element, which focuses on policy language additions that are aimed at reducing Vehicle Miles Traveled (VMT) by way of a variety of planning mechanisms.

The City ultimately prepared a focused update to its existing 2014 General Plan. The focused update concentrates on policy changes to the Circulation Element only, and does not change any other Element of the 2014 General Plan. The proposed Project is the focused update to the Circulation Element and adoption of the Transportation Impact Analysis Guidelines, which are supportive of the Circulation Element.

The City of Clovis, as lead agency, determined that the focused update to the General Plan is a "project" within the meaning of CEQA. CEQA requires the preparation of an EIR prior to approving any project that may have a significant impact on the environment. For the purposes of CEQA, the term "project" refers to the whole of an action, which has the potential for resulting in a direct physical change or a reasonably foreseeable indirect physical change in the environment (CEQA Guidelines Section 15378[a]).

This Draft Supplemental EIR (Draft EIR) has been prepared according to CEQA requirements to evaluate the potential environmental impacts associated with the proposed Project. This Draft EIR has been prepared in accordance with CEQA, California Resources Code Section 21000 et seq.; the Guidelines for the California Environmental Quality Act (California Code of Regulations, Title 14, Chapter 3); and the rules, regulations, and procedures for implementing CEQA as adopted by the City of Clovis.

An EIR must disclose the expected direct and indirect environmental impacts associated with a project, including impacts that cannot be avoided, growth-inducing effects, impacts found not to be significant, and significant cumulative impacts, as well as identify mitigation measures and alternatives to the proposed project that could reduce or avoid its adverse environmental impacts. CEQA requires government agencies to consider and, where feasible, minimize significant environmental impacts of proposed development.



## PROJECT DESCRIPTION

The City of Clovis is preparing a focused update to its existing General Plan. The proposed Project concentrates on policy changes to the Circulation Element only, and does not change any other Element of the General Plan. The proposed Project also includes adoption of the Transportation Impact Analysis Guidelines, which are supportive of the Circulation Element.

The focused General Plan Update does not affect land uses or development patterns, and does not result in any physical development. The key components of the focused General Plan Update include revisions to the goals and policies in the Circulation Element. A more detailed project description, including the policy modifications, is provided in the Draft EIR.

## ALTERNATIVES TO THE PROPOSED PROJECT

Section 15126.6 of the CEQA Guidelines requires an EIR to describe a reasonable range of alternatives to the proposed Project or to the location of the Project site which would reduce or avoid significant impacts, and which could feasibly accomplish the basic objectives of the proposed Project. Three alternatives to the proposed Project were developed based on input from City staff and the technical analysis performed to identify the environmental effects of the proposed Project. The alternatives analyzed in this EIR include the following three alternatives in addition to the proposed Project.

- **No Project Alternative:** This alternative assumes that there would be no focused update to its existing General Plan. There would be no policy changes to the Circulation Element, and the City would not adopt Transportation Impact Analysis Guidelines supportive of the Circulation Element. Under this alternative, the City would not be making any policy changes in response to SB 743, but would still be required to analyze projects for VMT. In the absence of defined TIA Guidelines, the City would utilize the Office of Planning and Research (OPR) Guidance for analyzing VMT.
- **Policy Change Only Alternative:** This alternative assumes that there would be a focused update to its existing General Plan. This would include policy changes to the Circulation Element intended to meet the mandates of State law related to conformance with SB 743. Under this alternative, the City would not adopt Transportation Impact Analysis Guidelines supportive of the Circulation Element, but would still be required to analyze projects for VMT. In the absence of defined TIA Guidelines, the City would utilize the OPR Guidance for analyzing VMT.
- **TIA Guidelines Only Alternative:** This alternative assumes that there would be no focused update to its existing General Plan. There would be no policy changes to the Circulation Element, but the City would adopt Transportation Impact Analysis Guidelines defining the methodology for analyzing VMT impacts in Clovis. Under this alternative, the City would not be making any policy changes in response to SB 743, but would still be required to analyze projects for VMT.

Alternatives are described in detail in Chapter 5 of the Draft EIR. Table ES-1 provides a comparison of the alternatives using a qualitative matrix that compares each alternative relative to the other Project alternatives. As summarized in Table ES-1 below, the Proposed Project is superior to the other Alternatives. The proposed Project is considered the environmentally superior alternative because it provides the greatest potential to be consistent with State law (SB 743), and to establish a consistent approach to VMT analysis, and VMT reduction when compared to the other alternatives. The proposed Project establishes the City’s policy direction related to these topics, while the other alternatives only partially address VMT reduction, or do not address the topic.

**TABLE ES-1: COMPARISON OF ALTERNATIVE PROJECT IMPACTS TO THE PROPOSED PROJECT**

<i>ENVIRONMENTAL TOPIC</i>	<i>PROPOSED PROJECT</i>	No Project Alternative	Policy Change Only Alternative	TIA Guidelines Only Alternative
<i>TRANSPORTATION AND CIRCULATION (TC)</i>				
TC Impact 3.1-1	No Impact	Slightly greater impact	Slightly greater impact	Slightly greater impact
TC Impact 3.1-2	Significant and Unavoidable	Greater Impact	Slightly Greater Impact	Slightly Greater Impact
TC Impact 3.1-3	Less than Significant	Equal Impact	Equal Impact	Equal Impact
Comparison to Proposed Project	Superior	Inferior (4th)	Inferior (2nd)	Inferior (3rd)

### COMMENTS RECEIVED

During the NOP process, several comments were received related to the analysis that were included in the Draft EIR. These comments are included as Appendix A of the Draft EIR, and were considered during preparation of the Draft EIR.

The City received two (2) comment letters during the Draft EIR public process, both from a public agency. These comment letters on the Draft EIR are identified in Table 2.0-1 of this Final EIR. The comments received during the Draft EIR review processes are addressed within this Final EIR.

*This Page Intentionally Left Blank.*

This Final Environmental Impact Report (Final EIR) was prepared in accordance with the California Environmental Quality Act (CEQA) and the State CEQA Guidelines (Section 15132). The City of Clovis (City) is the lead agency for the environmental review of the proposed Project and has the principal responsibility for approving the proposed Project. This Final EIR assesses the expected environmental impacts resulting from approval of the proposed Project and associated impacts from subsequent development and operation of the proposed Project, as well as responds to comments received on the Draft Supplemental Environmental Impact Report (Draft EIR).

## 1.1 PURPOSE AND INTENDED USES OF THE EIR

### CEQA REQUIREMENTS FOR A FINAL EIR

This Final EIR for the proposed Project has been prepared in accordance with the State CEQA Guidelines. State CEQA Guidelines Section 15132 requires that a Final EIR consist of the following:

- the Draft EIR or a revision of the draft;
- comments and recommendations received on the Draft EIR, either verbatim or in summary;
- a list of persons, organizations, and public agencies commenting on the Draft EIR;
- the responses of the lead agency to significant environmental concerns raised in the review and consultation process; and
- any other information added by the lead agency.

In accordance with State CEQA Guidelines Section 15132(a), the Draft EIR is incorporated by reference into this Final EIR. An EIR must disclose the expected environmental impacts, including impacts that cannot be avoided, growth-inducing effects, impacts found not to be significant, and significant cumulative impacts, as well as identify mitigation measures and alternatives to the proposed Project that could reduce or avoid its adverse environmental impacts. CEQA requires government agencies to consider and, where feasible, minimize environmental impacts of proposed development, and an obligation to balance a variety of public objectives, including economic, environmental, and social factors.

## TIERING

The Clovis City Council adopted the Clovis General Plan, and certified an EIR on August 25, 2014. The General Plan EIR was prepared as a program-level EIR. According to CEQA Guidelines section 15168, subdivision (c)(5), “[a] program EIR will be most helpful in dealing with later activities if it provides a description of planned activities that would implement the program and deals with the effects of the program as specifically and comprehensively as possible.” Later environmental documents (EIRs, mitigated negative declarations, or negative declarations) can incorporate by reference materials from the program EIR regarding regional influences, secondary impacts, cumulative impacts, broad alternatives, and other factors (CEQA Guidelines Section 15168[d][2]). These later documents need only focus on new impacts that have not been considered before (CEQA Guidelines Section 15168[d][3]).

## 1.0 INTRODUCTION

Section 15168(c), entitled “Use with Later Activities,” provides, in pertinent part, as follows:

Later activities in the program must be examined in the light of the program EIR to determine whether an additional environmental document must be prepared:

- (1) If a later activity would have effects that were not examined in the program EIR, a new Initial Study would need to be prepared leading to either an EIR or a Negative Declaration. That later analysis may tier from the program EIR as provided in Section 15152.
- (2) If the agency finds that pursuant to Section 15162, no subsequent EIR would be required, the agency can approve the activities as being within the scope of the project covered by the program EIR, and no new environmental document would be required. Whether a later activity is within the scope of a program EIR is a factual question that the lead agency determines based on substantial evidence in the record. Factors that an agency may consider in making that determination include, but are not limited to, consistency of the later activity with the type of allowable land use, overall planned density and building intensity, geographic area analyzed for environmental impacts, and covered infrastructure, as described in the program EIR.
- (3) An agency shall incorporate feasible mitigation measures and alternatives developed in the program EIR into later activities in the program.
- (4) Where the later activities involve site specific operations, the agency should use a written checklist or similar device to document the evaluation of the site and the activity to determine whether the environmental effects of the operation were within the scope of the program EIR.

This Supplemental EIR (SEIR) was prepared for the proposed Project pursuant to CEQA Guidelines Section 15162. Section 15162 states that a SEIR must be prepared for a project if there is a new significant environmental effect or new information of substantial importance that was not known or could not have been known at the time the previous EIR was certified [CEQA Guidelines Sec 15162(c)]. Furthermore, the CEQA Guidelines provide that a SEIR may be prepared if the project has only minor revisions [CEQA Guidelines Sec 15162(c)].

The legal requirements to address vehicle miles traveled under SB 743 are new, and has resulted in the City of Clovis needing to update their Circulation Element and to establish Transportation Impact Analysis Guidelines. The additional analysis required by the EIR is considered “new information of substantial importance that was not known or could not have been known at the time the previous EIR was certified” under [CEQA Guidelines Sec 15162(c)], thus requiring a Supplemental EIR. The addition of new policies and/or refinement of existing policies within the Circulation Element since the General Plan EIR was certified is new information that must be addressed in the Supplemental EIR.

The supplemental-level analysis focuses on the environmental effects from transportation only. An Initial Study was prepared and it was determined that all other environmental topics would have no change, or a less-than-significant impact as a result of the proposed Project. This Supplemental

EIR will be used to evaluate subsequent projects and activities under the General Plan as they relate to the environmental topic of transportation. This Supplemental EIR is intended to provide the supplemental information and environmental analysis necessary to assist public agency decision-makers in considering approval of new projects as they relate to the requirements of SB 743.

It is anticipated that the original certified EIR, combined with the Supplemental EIR will be used for future site-specific evaluations. Future site-specific approvals may also be narrowed pursuant to the rules for tiering set forth in CEQA Guidelines Section 15152. “[T]iering is a process by which agencies can adopt programs, plans, policies, or ordinances with EIRs focusing on ‘the big picture,’ and can then use streamlined CEQA review for individual projects that are consistent with such...[first tier decisions] and are...consistent with local agencies’ governing general plans and zoning.” (*Koster v. County of San Joaquin* (1996) 47 Cal.App.4th 29, 36.) Section 15152 provides that, where a first-tier EIR has “adequately addressed” the subject of cumulative impacts, such impacts need not be revisited in second- and third-tier documents. Furthermore, second- and third-tier documents may limit the examination of impacts to those that “were not examined as significant effects” in the prior EIR or “[a]re susceptible to substantial reduction or avoidance by the choice of specific revisions in the project, by the imposition of conditions, or other means.” In general, 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 impact 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.

Here, the City anticipates preparing a written checklist or similar device whenever landowners submit applications for site-specific approvals (i.e. tentative maps, conditional use permits, or other discretionary entitlements). The checklist would serve in part as a consistency checklist to determine if the application for site specific approval is consistent with the General Plan, Zoning, and Mitigation Measures, and it would also include a review of the project details relative to what was anticipated and analyzed in the certified EIR, including the Supplemental EIR (i.e. have all significant environmental impacts identified been “adequately addressed” in the EIR). Thus, if a new analysis is required for these site-specific actions, it would focus on impacts that cannot be “avoided or mitigated” by mitigation measures that either (i) were adopted in connection with the General Plan or (ii) were formulated based on information in the certified EIR and Supplemental EIR.

## CEQA GUIDELINES SECTION 15183 EXEMPTIONS

California Environmental Quality Act (CEQA) Guidelines Section 15183 allow a streamlined environmental review process for projects that are consistent with the densities established by

## 1.0 INTRODUCTION

existing zoning, community plan or general plan policies for which an Environmental Impact Report (EIR) was certified. Under section 15183 and the statute on which it is based, Public Resources Code section 21083.3, CEQA generally applies only to the impacts that are “peculiar to the parcel or to the project” and have not been previously disclosed, except where “substantial new information” shows that previously identified impacts would be more significant than previously assumed. Notably, impacts are considered not to be “peculiar to the parcel or to the project” if they can be substantially mitigated pursuant to previously adopted, uniformly applied development policies or standards. Moreover, lead agencies need not revisit impacts previously addressed as significant effects in the prior EIR. The provisions contained in Section 15183 of the CEQA Guidelines are presented below.

### **15183. PROJECTS CONSISTENT WITH A COMMUNITY PLAN OR ZONING**

*(a) CEQA mandates that projects which are consistent with the development density established by existing zoning, community plan, or general plan policies for which an EIR was certified shall not require additional environmental review, except as might be necessary to examine whether there are project-specific significant effects which are peculiar to the project or its site. This streamlines the review of such projects and reduces the need to prepare repetitive environmental studies.*

*(b) In approving a project meeting the requirements of this section, a public agency shall limit its examination of environmental effects to those which the agency determines, in an initial study or other analysis:*

- (1) Are peculiar to the project or the parcel on which the project would be located,*
- (2) Were not analyzed as significant effects in a prior EIR on the zoning action, general plan, or community plan, with which the project is consistent,*
- (3) Are potentially significant off-site impacts and cumulative impacts which were not discussed in the prior EIR prepared for the general plan, community plan or zoning action, or*
- (4) Are previously identified significant effects which, as a result of substantial new information which was not known at the time the EIR was certified, are determined to have a more severe adverse impact than discussed in the prior EIR.*

*(c) If an impact is not peculiar to the parcel or to the project, has been addressed as a significant effect in the prior EIR, or can be substantially mitigated by the imposition of uniformly applied development policies or standards, as contemplated by subdivision (e) below, then an additional EIR need not be prepared for the project solely on the basis of that impact.*

*(d) This section shall apply only to projects which meet the following conditions:*

- (1) The project is consistent with:*
  - (A) A community plan adopted as part of a general plan,*

*(B) A zoning action which zoned or designated the parcel on which the project would be located to accommodate a particular density of development, or*

*(C) A general plan of a local agency, and*

*(2) An EIR was certified by the lead agency for the zoning action, the community plan, or the general plan.*

*(e) This section shall limit the analysis of only those significant environmental effects for which:*

*(1) Each public agency with authority to mitigate any of the significant effects on the environment identified in the planning or zoning action undertakes or requires others to undertake mitigation measures specified in the EIR which the lead agency found to be feasible, and*

*(2) The lead agency makes a finding at a public hearing as to whether the feasible mitigation measures will be undertaken.*

*(f) An effect of a project on the environment shall not be considered peculiar to the project or the parcel for the purposes of this section if uniformly applied development policies or standards have been previously adopted by the City or county with a finding that the development policies or standards will substantially mitigate that environmental effect when applied to future projects, unless substantial new information shows that the policies or standards will not substantially mitigate the environmental effect. The finding shall be based on substantial evidence which need not include an EIR. Such development policies or standards need not apply throughout the entire City or county but can apply only within the zoning district in which the project is located, or within the area subject to the community plan on which the lead agency is relying. Moreover, such policies or standards need not be part of the general plan or any community plan but can be found within another pertinent planning document such as a zoning ordinance. Where a City or county, in previously adopting uniformly applied development policies or standards for imposition on future projects, failed to make a finding as to whether such policies or standards would substantially mitigate the effects of future projects, the decision-making body of the City or county, prior to approving such a future project pursuant to this section, may hold a public hearing for the purpose of considering whether, as applied to the project, such standards or policies would substantially mitigate the effects of the project. Such a public hearing need only be held if the City or county decides to apply the standards or policies as permitted in this section.*

*(g) Examples of uniformly applied development policies or standards include, but are not limited to:*

*(1) Parking ordinances.*

*(2) Public access requirements.*

*(3) Grading ordinances.*

*(4) Hillside development ordinances.*



## 1.0 INTRODUCTION

*(5) Flood plain ordinances.*

*(6) Habitat protection or conservation ordinances.*

*(7) View protection ordinances.*

*(8) Requirements for reducing greenhouse gas emissions, as set forth in adopted land use plans, policies, or regulations.*

*(h) An environmental effect shall not be considered peculiar to the project or parcel solely because no uniformly applied development policy or standard is applicable to it.*

*(i) Where the prior EIR relied upon by the lead agency was prepared for a general plan or community plan that meets the requirements of this section, any rezoning action consistent with the general plan or community plan shall be treated as a project subject to this section.*

*(1) "Community plan" is defined as a part of the general plan of a City or county which applies to a defined geographic portion of the total area included in the general plan, includes or references each of the mandatory elements specified in Section 65302 of the Government Code, and contains specific development policies and implementation measures which will apply those policies to each involved parcel.*

*(2) For purposes of this section, "consistent" means that the density of the proposed project is the same or less than the standard expressed for the involved parcel in the general plan, community plan or zoning action for which an EIR has been certified, and that the project complies with the density-related standards contained in that plan or zoning. Where the zoning ordinance refers to the general plan or community plan for its density standard, the project shall be consistent with the applicable plan.*

*(j) This section does not affect any requirement to analyze potentially significant offsite or cumulative impacts if those impacts were not adequately discussed in the prior EIR. If a significant offsite or cumulative impact was adequately discussed in the prior EIR, then this section may be used as a basis for excluding further analysis of that offsite or cumulative impact.*

## 1.2 ENVIRONMENTAL REVIEW PROCESS

The review and certification process for the EIR has involved, or will involve, the following general procedural steps:

### NOTICE OF PREPARATION AND INITIAL STUDY

The City of Clovis circulated a Notice of Preparation (NOP) of an EIR for the proposed project on April 4, 2022 to trustee and responsible agencies, the State Clearinghouse, and the public. A scoping meeting was held on April 27, 2022 at the City of Clovis City Hall. No public or agency comments on the NOP related to the EIR analysis were presented or submitted during the scoping meeting. However, during the 30-day public review period for the NOP, which ended on May 4,

2022, eight (8) written comment letters were received on the NOP. The NOP and all comments received on the NOP are presented in Appendix A of the Draft EIR.

## NOTICE OF AVAILABILITY AND DRAFT EIR

---

The City published a public Notice of Availability (NOA) for the Draft EIR on June 29, 2022, inviting comment from the general public, agencies, organizations, and other interested parties. The NOA was filed with the State Clearinghouse (SCH # 2012061069) and the County Clerk, and was published in a local newspaper pursuant to the public noticing requirements of CEQA. The Draft EIR was available for public review and comment from June 29, 2022 through August 15, 2022.

The Draft EIR contains the Project Description, Environmental Setting, identification of Project impacts, and mitigation measures for impacts found to be significant, as well as an analysis of Project alternatives, identification of significant irreversible environmental changes, growth-inducing impacts, and cumulative impacts. The Draft EIR identifies issues determined to have no impact or a less-than-significant impact, and provides detailed analysis of potentially significant and significant impacts. Comments received in response to the NOP were considered in preparing the analysis in the Draft EIR.

## RESPONSE TO COMMENTS/FINAL EIR

---

The City received two (2) comment letters regarding the Draft EIR from public agencies. These comment letters on the Draft EIR are identified in Table 2.0-1, and are found in Chapter 2.0 of this Final EIR.

In accordance with CEQA Guidelines Section 15088, this Final EIR responds to the written comments received on the Draft EIR, as required by CEQA. This Final EIR also contains minor edits to the Draft EIR, which are included in Chapter 3.0, Revisions. This document, as well as the Draft EIR as amended herein, constitute the Final EIR.

## CERTIFICATION OF THE EIR/PROJECT CONSIDERATION

---

The City of Clovis will review and consider the Final EIR. If the City finds that the Final EIR is "adequate and complete," the City Council may certify the Final EIR in accordance with CEQA and City of Clovis environmental review procedures and codes. The rule of adequacy generally holds that an EIR can be certified if:

- 1) The EIR shows a good faith effort at full disclosure of environmental information; and
- 2) The EIR provides sufficient analysis to allow decisions to be made regarding the proposed project which intelligently take account of environmental consequences.

Upon review and consideration of the Final EIR, the City Council may take action to approve, revise, or reject the proposed Project. A decision to approve the proposed Project, for which this EIR identifies significant environmental effects, must be accompanied by written findings in accordance with State CEQA Guidelines Sections 15091 and 15093. A Mitigation Monitoring and Reporting Program, as described below, would also be adopted in accordance with Public

## 1.0 INTRODUCTION

---

Resources Code Section 21081.6(a) and CEQA Guidelines Section 15097 for mitigation measures that have been incorporated into or imposed upon the proposed Project to reduce or avoid significant effects on the environment. This Mitigation Monitoring and Reporting Program has been designed to ensure that these measures are carried out during Project implementation, in a manner that is consistent with the EIR.

### 1.3 ORGANIZATION OF THE FINAL EIR

This Final EIR has been prepared consistent with Section 15132 of the State CEQA Guidelines, which identifies the content requirements for Final EIRs. This Final EIR is organized in the following manner:

#### CHAPTER 1.0 – INTRODUCTION

---

Chapter 1.0 briefly describes the purpose of the environmental evaluation, identifies the lead, agency, summarizes the process associated with preparation and certification of an EIR, and identifies the content requirements and organization of the Final EIR.

#### CHAPTER 2.0 – COMMENTS ON THE DRAFT EIR AND RESPONSES

---

Chapter 2.0 provides a list of commenters, copies of written and electronic comments made on the Draft EIR (coded for reference), and responses to those written comments.

#### CHAPTER 3.0 – REVISIONS

---

Chapter 3.0 consists of minor revisions to the Draft EIR in response to comments received on the Draft EIR.

#### CHAPTER 4.0 – FINAL MMRP

---

Chapter 4.0 consists of a Mitigation Monitoring and Reporting Program (MMRP). The MMRP is presented in a tabular format that presents the impacts, mitigation measure, and responsibility, timing, and verification of monitoring.

2.0

COMMENTS ON DRAFT EIR AND RESPONSES

2.1 INTRODUCTION

No new significant environmental impacts or issues, beyond those already covered in the Draft EIR for the proposed Project, were raised during the comment period. Responses to comments received during the comment period do not involve any new significant impacts or add “significant new information” that would require recirculation of the Draft EIR pursuant to CEQA Guidelines Section 15088.5.

CEQA Guidelines Section 15088.5 states that: *New information added to an EIR is not “significant” unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project’s proponents have declined to implement.*

Sections 2.0 and 3.0 of this Final EIR include information that has been added to the EIR since the close of the public review period in the form of responses to comments and revisions.

2.2 LIST OF COMMENTERS

Table 2.0-1 lists the comments on the Draft EIR that were submitted to the City during the 45-day public review period for the Draft EIR. The assigned comment letter or number, letter date, letter author, and affiliation, if presented in the comment letter or if representing a public agency, are also listed. Letters received are coded with letters (A, B, etc.).

**TABLE 2.0-1 LIST OF COMMENTERS ON DRAFT EIR**

RESPONSE LETTER	INDIVIDUAL OR SIGNATORY	AFFILIATION	DATE
A	David Padilla	Caltrans	8-15-22
B	Denise Wade	Fresno Metropolitan Flood Control District	8-16-22

2.3 COMMENTS AND RESPONSES

REQUIREMENTS FOR RESPONDING TO COMMENTS ON A DRAFT EIR

CEQA Guidelines Section 15088 requires that lead agencies evaluate and respond to all comments on the Draft EIR that regard an environmental issue. The written response must address the significant environmental issue raised and provide a detailed response, especially when specific comments or suggestions (e.g., additional mitigation measures) are not accepted. In addition, the written response must be a good faith and reasoned analysis. However, lead agencies need only to respond to significant environmental issues associated with the proposed Project and do not need to provide all the information requested by the commenter, as long as a good faith effort at full disclosure is made in the EIR (CEQA Guidelines Section 15204).

CEQA Guidelines Section 15204 recommends that commenters provide detailed comments that focus on the sufficiency of the Draft EIR in identifying and analyzing the possible environmental impacts of the proposed Project and ways to avoid or mitigate the significant effects of the proposed Project, and that commenters provide evidence supporting their comments. Pursuant to CEQA Guidelines Section 15064, an effect shall not be considered significant in the absence of substantial evidence.

## 2.0 COMMENTS ON DRAFT EIR AND RESPONSES

---

CEQA Guidelines Section 15088 also recommends that revisions to the Draft EIR be noted as a revision in the Draft EIR or as a separate section of the Final EIR. Chapter 3.0 of this Final EIR identifies all revisions to the Draft EIR.

### RESPONSES TO COMMENT LETTERS

Written comments on the Draft EIR are reproduced on the following pages, along with responses to those comments. To assist in referencing comments and responses, the following coding system is used:

- Each letter is lettered or numbered (i.e., Letter A) and each comment within each letter is numbered (i.e., comment A-1, comment A-2).

# COMMENTS ON DRAFT EIR AND RESPONSES

2.0

CALIFORNIA STATE TRANSPORTATION AGENCY

GAVIN NEWSOM, GOVERNOR

## California Department of Transportation

DISTRICT 6 OFFICE  
1352 WEST OLIVE AVENUE | P.O. BOX 12616 | FRESNO, CA 93778-2616  
(559) 908-7064 | FAX (559) 488-4195 | TTY 711  
[www.dot.ca.gov](http://www.dot.ca.gov)



August 15, 2022

FRE-GEN  
DEIR – Draft EIR  
NOA DEIR – 2014 Clovis General Plan Circulation Update  
SCH # 2012061069  
<https://ld-igr-gts.dot.ca.gov/district/6/report/26354>

### SENT VIA EMAIL

Dave Merchen, City Planner  
Planning Division  
City of Clovis  
1033 Fifth Street  
Clovis, CA 93612

Dear Mx. Merchen:

Thank you for the opportunity to review the Supplemental Draft Environmental Impact Report (DEIR) for the 2014 Clovis General Plan Circulation Element Update (SCH# 2012061069). The City of Clovis is preparing a focused update to its existing General Plan to address Senate Bill 743 (SB 743) which concentrates on policy changes to the Circulation Element only and does not change any other Element within the General Plan. It includes the adoption of the Transportation Impact Analysis Guidelines, which are supportive of the Circulation Element. This update does not affect land uses or development patterns and does not result in any physical development with the primary focus being on revisions to the goals and policies in the Circulation Element. The DEIR addresses environmental impacts associated with the proposed update.

A-1

The project's Notice of Preparation (NOP) and Initial Study was previously reviewed by our office with comments provided in the submittal of a letter dated May 4, 2022, which is included in the DEIR Appendix B.

Caltrans provides the following comments consistent with the State's smart mobility goals that support a vibrant economy and sustainable communities:

1. Caltrans encourages local agencies in considering the creation of a Vehicle Miles Traveled (VMT) Mitigation Impact Fee to help reduce impacts on the State Highway System (SHS).

A-2

"Provide a safe and reliable transportation network that serves all people and respects the environment"

2.0 COMMENTS ON DRAFT EIR AND RESPONSES

Dave Merchen, NOA DEIR – 2014 Clovis General Plan Circulation Update  
 August 15, 2022  
 Page 2

- |  |  |     |
|--|--|-----|
| <p>2. Caltrans encourages local agencies to consider implementing policies that support multimodal transportation systems (such as bicycle and pedestrian facilities and public transportation services) to provide connectivity of modes within communities which also help reduce VMT.</p> |  | A-3 |
| <p>3. As mentioned in the City's <i>Interim Transportation Impact Analysis Guidelines</i> Section 3.2.1., Caltrans encourages the City and project proponents to coordinate with Caltrans in regard to projects that have potential to impact the SHS.</p>                                   |  | A-4 |
| <p>4. Active Transportation Plans and Smart Growth efforts support the state's 2050 Climate goals. Caltrans supports reducing VMT and GHG emissions in ways that increase the likelihood people will use and benefit from a multimodal transportation network.</p>                           |  | A-5 |

If you have any other questions, please call or email Christopher Xiong at (559) 908-7064 or [Christopher.Xiong@dot.ca.gov](mailto:Christopher.Xiong@dot.ca.gov).

Sincerely,

DAVID PADILLA, Branch Chief  
 Transportation Planning – North

C: State Clearinghouse

"Provide a safe and reliable transportation network that serves all people and respects the environment"

**Response to Letter A: Caltrans**

**Response A-1:** The commenter provides an introductory statement and acknowledges receipt of the DEIR for their review.

This comment does not warrant a response.

**Response A-2:** The commenter states: “Caltrans encourages local agencies in considering the creation of a Vehicle Miles Traveled (VMT) Mitigation Impact Fee to help reduce impacts on the State Highway System (SHS).”

This comment is noted. The City is proposing the following policy for including in the Circulation Element Update:

Policy 2.7 VMT Mitigation Fee Program. Evaluate the feasibility of a VMT mitigation fee program and explore opportunities for establishing an in-lieu mitigation fee to offset VMT impacts from development.

**Response A-3:** The commenter states: “Caltrans encourages local agencies to consider implementing policies that support multimodal transportation systems (such as bicycle and pedestrian facilities and public transportation services) to provide connectivity of modes within communities which also help reduce VMT.”

This comment is noted. The City has added several modifications to existing policies, and new policies, that are intended to support a multimodal transportation system, including bike/ped.

**Response A-4:** The commenter states: “As mentioned in the City’s Interim Transportation Impact Analysis Guidelines Section 3.2.1., Caltrans encourages the City and project proponents to coordinate with Caltrans in regard to projects that have potential to impact the SHS.”

This comment is noted. The City includes several policies in the Circulation Element Update that are intended to ensure that projects are coordinated with Caltrans and other neighboring agencies to ensure that projects do not have adverse impacts on the roadway system.

**Response A-5:** The commenter states: “Active Transportation Plans and Smart Growth efforts support the state’s 2050 Climate goals. Caltrans supports reducing VMT and GHG emissions in ways that increase the likelihood people will use and benefit from a multimodal transportation network”

This comment is noted. The City has updated the Circulation Element, and prepared the TIA Guidelines, to guide reduction in VMT and GHG emissions through a multimodal transportation system.





**Fresno Metropolitan Flood Control District**  
*Capturing Stormwater since 1956*

File 170.11  
 400.11  
 410.10

August 16, 2022

Dave Merchen, City Planner  
 City of Clovis Planning Division  
 1033 Fifth Street  
 Clovis, CA 93612

Dear Mr. Merchen,

**Notice of Availability – 2014 Clovis General Plan Circulation Element Update Draft Environmental Impact Report**

The Fresno Metropolitan Flood Control District previously provided comments for the Notice of Preparation - 2014 Clovis General Plan Circulation Element Update on May 4, 2022. The comments are still applicable, and a copy of the letter is enclosed for your reference.

B-1

Thank you for the opportunity to comment. Please keep our office informed on the development of this project. If you should have any questions, please do not hesitate to contact me at (559) 456-3292.

Sincerely,

Denise Wade  
 Master Plan and Special Projects Manager

DW/lrl

Attachment



**Fresno Metropolitan Flood Control District**  
*Capturing Stormwater since 1956*

File 170.11  
400.11  
410.10

May 4, 2022

Ricky Caperton, AICP, Deputy City Planner  
City of Clovis Planning Division  
1033 Fifth Street  
Clovis, CA 93612

Dear Ricky,

**Notice of Preparation – 2014 Clovis General Plan Circulation Element Update**

The Fresno Metropolitan Flood Control District (District) has adopted storm drainage Master Plan systems for the areas located within the 2014 Clovis General Plan Circulation Element (Plan Area). These Master Plan systems are based on the previously adopted General and Specific Plan land uses commented by the District August 12, 2014.

The District offers the following comments specific to the review of the Plan Area:

1. Page 8 (Policy 1.7 – Narrow Streets) and Page 9 (Policy 3.1 – Traffic calming): The District recommends that the City include a provision for determining street conveyance capacity and an elevation of structures policy for narrow streets and streets with traffic calming curbs where tributary drainage areas are significant and may pose a threat to buildings/structures. In addition, narrow street policy should include and address provisions for utility placement.

B-2

Streets are an essential drainage element for the flow of surface waters to a storm drain inlet. The geometry (including width) is critical for surface flow during heavy or intense storm events. A wider street has a greater conveyance capacity and less conflict between the driving area and the inundated area. For instance, the standard 2-year design storm is to intercept water at the height or depth of the top of curb ( 6-inches deep). On a 40-foot wide street, the street crown and the top of curb are nearly equal, but the center of the street is generally visible. As a street is narrowed by four-feet, the full street would be inundated, including the crown. At this narrow width, the visibility of the pavement is gone, there is a loss of perception of water depth and a safe path of travel disappears.

k:\letters\general plan amendment letters\clovis\clovis gpa update nop 2014 circulation element.docx  
5469 E. Olive Avenue • Fresno, CA 93727 • (559) 456-3292 • FAX (559) 456-3194  
[www.fresnofloodcontrol.org](http://www.fresnofloodcontrol.org)

**City of Clovis Planning Division  
Notice of Preparation –  
2014 Clovis General Plan Circulation Element Update  
May 4, 2022  
Page 2**

Narrow streets and reduced right-of-ways will allow higher development densities and traffic calming effects, however if the area subject to these modified standards has a storm drainage infrastructure that has already been constructed, the new street standards and increased development densities will have impacts on the parameters used to calculate runoff coefficients that determine the size of the storm drainage system. The existing storm drainage system cannot accommodate reduced right-of-ways if the City desires to maintain the current level of drainage service provided to the community.

The only means of mitigating the reduced conveyance capacity of narrower streets would be to lower the tributary area, extend the storm drainage system or accept a lower level of drainage service. The first two options are essentially impracticable and very expensive in existing developed areas. When large areas are tributary to a specific location, the narrower street geometry should not be approved. In all cases of reduced street widths, the street geometry should be analyzed to determine the flow carrying capacity in relation to the tributary area.

The District's drainage system is designed for a 2-year storm event. When storms exceed the capacity of the storm drainage pipeline collection system, water must be temporarily stored on the surface until the storm subsides and the collection system can remove the storm water. Narrower streets have less storage volume available in the public right-of-way, necessitating more private property flooding and a need for elevating structures to a greater height above the street in order to provide the same level of protection from flooding, especially if reduced building setbacks are considered.

An additional impact of narrower streets is the ability to provide adequate room within the street right-of-way for the various utilities and their future repair. The District recommends that all agencies and utility companies review where their utility's relative position would be within the narrower street and determine potential conflicts and consequences of the reduced clearances prior to the adoption of a narrow street policy.

B-2 Cont'd

k:\letters\general plan amendment letters\clovis\clovis gpa update nop 2014 circulation element.docx

**City of Clovis Planning Division  
Notice of Preparation –  
2014 Clovis General Plan Circulation Element Update  
May 4, 2022  
Page 3**

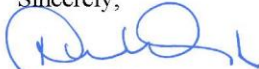
2. Figure 5 Circulation Diagram: The plan indicates north-south streets from Tollhouse Road extending to properties to the north over the existing levee and through the flowage area of Big Dry Creek Reservoir. It should be noted and considered that in order to construct roads at these locations, they would have to be elevated to cross the levee as well as crossing the inflow floodplain without having a hydraulic effect on flood flows. This could mean construction of bridges of substantial length and/or modification of road alignments.
  
3. Figure 6 Bicycle and Trails System: While we understand City Parks designations on this figure may not be able to change at this time, we wish to point out that existing Basins “BX”, “4D”, and Big Dry Creek Reservoir should be removed as a city park designations. Basins “BX” and “4D” are not designated as dual use for parks. The potential secondary use for Big Dry Creek Reservoir has been discussed at a local level but would require federal approval from the U.S. Army Corps of Engineers.

B-2 Cont'd

In addition, the District would recommend identifying basin facilities that are dual use facilities for parks. Please see attached Figure 6 for reference.

Thank you for the opportunity to comment. If you have any questions or require further information, please do not hesitate to contact me at (559) 456-3292.

Sincerely,

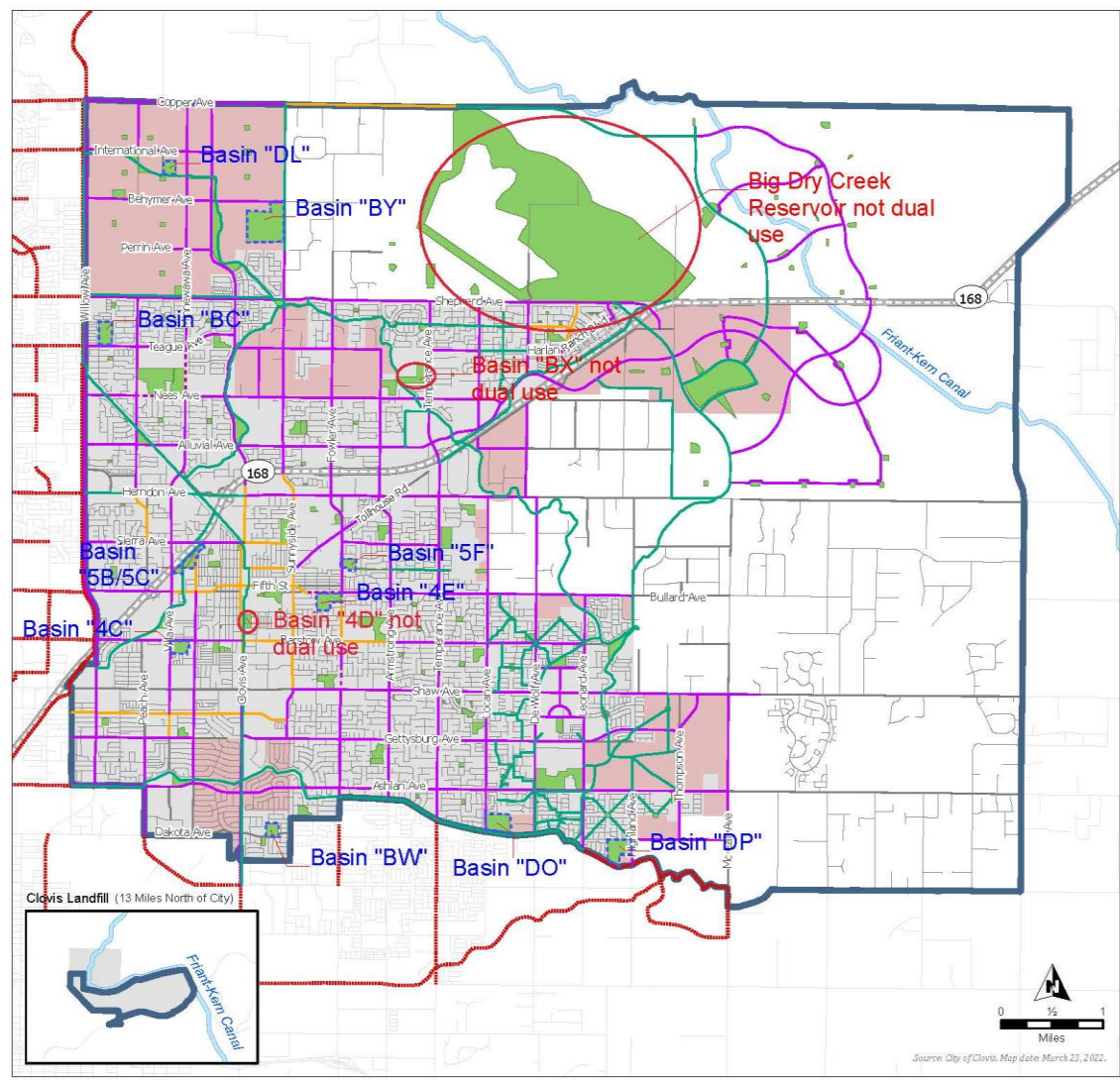


Denise Wade  
Master Plan and Special Projects Manager

DW/lrl

Attachment

k:\letters\general plan amendment letters\clovis\clovis gpa update nop 2014 circulation element.docx



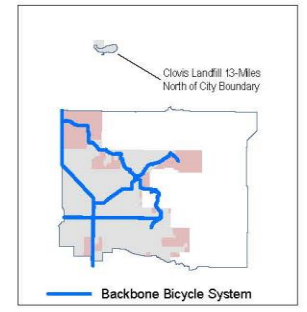
CITY OF CLOVIS

Figure 6  
Bicycle and Trails System

**LEGEND**

- Class I - Multipurpose Trail
- Class II - Bike Lane
- Class III - Bike Route
- Class II or III - Bikeway
- City of Fresno - Existing & Proposed Trail System
- Clovis City Limits
- Clovis Sphere of Influence
- Planning Area Boundary
- City Parks

**FMFCD Dual Use Basin Facilities**



De Novo Planning Group  
A Local Tree Planning, Design, and Environmental Firm

Source: City of Clovis. Map date: March 23, 2022.

**Response to Letter B: Central Valley Regional Water Quality Control Board**

**Response B-1:** The commenter states: “The Fresno Metropolitan Flood Control District previously provided comments for the Notice of Preparation - 2014 Clovis General Plan Circulation Element Update on May 4, 2022. The comments are still applicable, and a copy of the letter is enclosed for your reference.”

This comment is noted. The NOP comment letter from Fresno Metropolitan Flood Control District was received during the NOP process, and was included as an Appendix to the Draft EIR.

**Response B-2:** The commenter attached an NOP comment letter that they previously provided to the City, and which the City included as an appendix to the DEIR. The NOP comment letter provides various design level recommendations for roadways within the City’s roadway network. Recommendations covered storm drainage and flooding as it related to bicycle/pedestrian, dual use parks, levee crossings, etc.

These comments are noted. These are engineering and design level considerations, whereas, the proposed Project is a policy document at a programmatic level. There are no proposed designs for roadways, bike/ped facilities, parks, or storm drainage facilities. Individual projects that are developed throughout the City under the General Plan will be evaluated at a project-by-project level through planning and engineering staff. The City recognizes the need for appropriate planning and engineering of the facilities mentioned in the commenters letter, however, the time is not ripe for engineering specific facilities at this programmatic stage.

*This Page Intentionally Left Blank.*

This section includes minor edits and changes to the Draft EIR. The need for modifications results from responses to comments received during the public review period for a Draft EIR, as well as City staff-initiated edits that may be needed to clarify the details of a project.

Any revisions to the Draft EIR that would result in a new significant environmental impact, or significant new information, would warrant recirculation of the Draft EIR pursuant to State CEQA Guidelines Section 15088.5. However, revisions provided in an Errata do not constitute significant new information, or cause new significant environmental impacts, nor do they alter the conclusions of the environmental analysis that would warrant recirculation of the Draft EIR pursuant to State CEQA Guidelines Section 15088.5. Instead, Errata revisions are intended to clarify, amplify, or correct information provided in the Draft EIR. Errata changes are provided in tracked change format with underline for new text and ~~strike out for deleted text~~.

### 3.1 REVISIONS TO THE DRAFT EIR

At this time comments provided on the Draft EIR did not warrant revisions to the text of the document. Nevertheless, this section is reserved for revisions to the Draft EIR, including those that may occur leading up to the City Council consideration of the proposed Project.



*This Page Intentionally Left Blank.*

## MITIGATION MONITORING AND REPORTING PROGRAM

### 4.0

This document is the Final Mitigation Monitoring and Reporting Program (FMMRP) for the 2014 Clovis General Plan Circulation Element Update (Project). This FMMRP has been prepared pursuant to Section 21081.6 of the California Public Resources Code, which requires public agencies to “adopt a reporting and monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment.” A FMMRP is required for the proposed Project because the EIR has identified significant adverse impacts, and measures have been identified to mitigate those impacts.

The numbering of the individual mitigation measures follows the numbering sequence as found in the Draft EIR.

### 4.1 MITIGATION MONITORING AND REPORTING PROGRAM

The FMMRP, as outlined in the following table, describes mitigation timing, monitoring responsibilities, and compliance verification responsibility for all mitigation measures identified in this Final EIR.

The City will be the primary agency responsible for implementing the mitigation measures and will continue to monitor mitigation measures that are required to be implemented during the operation of the proposed Project.

The FMMRP is presented in tabular form on the following pages. The components of the FMMRP are described briefly below:

- **Mitigation Measures:** The mitigation measures are taken from the Draft EIR in the same order that they appear in that document.
- **Mitigation Timing:** Identifies at which stage of the project mitigation must be completed.
- **Monitoring Responsibility:** Identifies the agency that is responsible for mitigation monitoring.
- **Compliance Verification:** This is a space that is available for the monitor to date and initial when the monitoring or mitigation implementation took place.





*This page left intentionally blank.*



# CITY *of* CLOVIS

## REPORT TO THE CITY COUNCIL

TO: Mayor and City Council  
 FROM: General Services Department  
 DATE: October 17, 2022  
 SUBJECT: Consider Approval – Implementation of Clovis Transit Program to Carry Narcan on Transit Vehicles.

**Staff:** Amy Hance, General Services Manager  
**Recommendation:** Approve

ATTACHMENTS: 1. Naloxone Distribution Project Documents  
 2. Fresno County Health Department Letter of Support

### CONFLICT OF INTEREST

None.

### RECOMMENDATION

For the City Council to approve the implementation of the Clovis Transit Narcan Program to commence as soon as practicable.

### EXECUTIVE SUMMARY

In response to the opioid crisis and the flow of fentanyl into Fresno County, staff has developed a program in which Clovis Transit vehicles would carry Narcan (generic name: naloxone) to be available for emergency use. The program will be supported by the State of California Health and Human Services Agency's Naloxone Distribution Project and the Fresno County Health Department. Once Clovis Transit drivers have received the appropriate training, every transit vehicle will carry a box of Narcan which can be used to reverse the effects of opioid overdose.

### BACKGROUND

The opioid crisis has been well documented in the media, and reports of increasing flow of fentanyl into California and the Central Valley are common. Opioids like fentanyl and other similar drugs act on the nervous system by suppressing consciousness and respiratory drive. According to the California Department of Public Health, fentanyl is one of the most common opioids associated with overdose. The United States Drug Enforcement Agency warns that fentanyl is not only easily obtained, but is also now being produced using bright colors, shapes, and sizes to drive addiction among young people. Additionally, these bright colors and shapes look like candy and sidewalk chalk which may result in small children ingesting the pills by accident.

Narcan (naloxone) is a potentially lifesaving medication designed to help reverse the effects of an opioid overdose in minutes. Expanding the awareness and availability of Narcan is a key part of the public health response to the opioid epidemic. Narcan is currently a prescription drug but is not a controlled substance. It has few known adverse effects, no potential for abuse, and can be rapidly administered through nasal spray. Trained bystanders can effectively respond and reverse an opioid overdose.

Under this new program, Clovis Transit would become the newest community agency to increase access to Narcan in public spaces in Clovis and Fresno. Some transit agencies in the mid-west have implemented a similar program, but Clovis Transit is in the forefront of the program in California. Other California public transit agencies are expected to implement within the next year. Each Clovis Transit vehicle would carry a Narcan kit which will contain two doses of Narcan in the easy-to-use nasal spray form, instructions for its use, and other emergency supplies. Once a driver receives training, they would pick up a Narcan kit along with their vehicle keys and computer tablet and begin their shift. The Narcan kit would remain with the driver in the vehicle for emergency use either on the bus or anywhere the bus may be during the shift.

Clovis Transit will receive two-dose boxes of Narcan at no cost through the State of California Health and Human Services Agency's Naloxone Distribution Project. Transit drivers will be trained to recognize a potential overdose and how to administer Narcan by emergency services training staff. All required documents and reports will be maintained by the General Services Manager.

#### **FISCAL IMPACT**

The cost of the pouches that will hold the Narcan kits is \$400 for 40 pouches. Funds already received through State Transit Assistance will be used for the expenditure.

#### **REASON FOR RECOMMENDATION**

Readily available Narcan is the antidote for an opioid overdose which can sustain a person until emergency services personnel arrive to assist. Public transit buses and vehicles travel throughout Clovis and many areas of Fresno and are easily identified. Carrying Narcan kits on Clovis Transit vehicles will exponentially increase community access to the drug in cases of opioid overdose.

#### **ACTIONS FOLLOWING APPROVAL**

Staff will implement the program and a public information campaign will be launched.

Prepared by: Amy Hance, General Services Manager

Reviewed by: City Manager *AH*

## Naloxone Distribution Project (NDP) Application

### Instructions

Complete the application below. Please ensure the person applying is authorized to be the representation of your organization in California to apply for and receive this naloxone distribution. The information submitted in this application should be publicly accessible information and may be subjected to the Public Records Act.

**Please be sure to check the application for accuracy before submitting.**

First Name of Authorized Person	FedEx Delivery Address (must be a business address, not a personal address or P.O. Box)
Amy	155 N. Sunnyside Avenue
Middle Name	Address Line 2
Last Name	City
Hance	Clovis
Contact Number	Zip
(559) 324-2769	93612
Email	State
amyh@cityofclovis.com	CA
Organization Name	Service Location Address
City of Clovis - Clovis Transit	155 N. Sunnyside Avenue
Type of Organization	Address Line 2
Community Organization (Specify) <input type="text"/>	
Community Organization - Specify Type	City
Public Transit	Clovis
Organization Website	Zip
www.cityofclovis.com	93612
Organization Phone Number	State CA
(559) 324-2000	<input checked="" type="checkbox"/> Delivery location is able to accept pallet shipments



State of California – Health and Human Services Agency

Department of Health Care Services

Unit request - Minimum unit request is 12. Request must be a multiple of 12. Each unit comes with 2 doses.

48

If you would like additional individuals to receive shipment information for approved orders, list their email(s) below.

bethanyb@cityofclovis.com

**You must certify and agree to the information in this section to receive the naloxone distribution.**

I hereby certify that I have read, understand, and accept all the terms and conditions under which the naloxone distribution is valid for use.

I hereby certify that I have reviewed and undergone training in opioid overdose prevention and treatment training to respond effectively to an opioid-associated overdose emergency.

Review online resources at the [GetNaloxoneNow](#) website and the [Harm Reduction Coalition's overdose response](#) website to train and respond effectively to an opioid-associated overdose emergency.

If known/available, I hereby agree to maintain and report information via email to [naloxone@dhcs.ca.gov](mailto:naloxone@dhcs.ca.gov) regarding the number of reversals that occurred using the naloxone distributed under this application order.

**Terms and Conditions**

By submitting the application form, the organization/entity:

1. Certifies that the authorized person, communication and mailing information provided is correct.
2. Will ensure that any of its affiliates or subcontractors apply for their organization.
3. Agrees to provide a copy of a valid and active business license, FEIN number or tax exempt letter.
4. Agrees to provide a copy of a naloxone standing order that can be obtained at the California Department of Public Health's [standing order application](#) or a physician's prescription.
5. If the naloxone request is for more than 48 units, the organization/entity will provide a comprehensive summary with the application to validate their request.
6. Agrees to allow the California Department of Health Care Services (DHCS) to contact the organization/entity using the information provided on the application form.
7. Agrees to allow the California DHCS to use the information provided on the application form to track the use of the naloxone distribution and conduct other public health and epidemiological surveillance activities.

Submit supporting documents and application electronically to [naloxone@dhcs.ca.gov](mailto:naloxone@dhcs.ca.gov)

Note: Some links on this page are documents in Adobe Acrobat Portable Document Format (PDF). PDF documents require Adobe Reader. If you need to install or upgrade to the latest version, click the ["Download Free Reader"](#).

9/20/22, 3:32 PM

Naloxone Standing Order



State of California—Health and Human Services Agency  
California Department of Public Health



GAVIN NEWSOM  
Governor

## Naloxone Standing Order

### Purpose

The purpose of this standing order is to help reduce morbidity and mortality associated with opioid overdose by facilitating the distribution and administration of Naloxone Hydrochloride (Naloxone). Naloxone is an opioid antagonist indicated for the complete or partial reversal of opioid overdose, including respiratory depression, induced by natural and synthetic opioids. It may be delivered intramuscularly with a needle or intranasally. Naloxone is indicated for emergency treatment of a known or suspected opioid overdose. It is not a substitute for emergency medical care.

This standing order authorizes:

Non-prescribing entities in California to distribute naloxone to individuals at risk of opioid overdose, their family members and friends, or other persons in a position to assist during an opioid-related overdose, who have completed an opioid overdose prevention and treatment training program.

The administration of naloxone received from the entity using this standing order to assist a person experiencing or reasonably suspected of experiencing an opioid overdose, by a family member, friend, or other person who has received opioid overdose prevention and treatment training from an opioid overdose prevention and treatment training program.

### Authority

This standing order is issued pursuant to paragraphs (1) and (2) of subdivision (c) of Section 1714.22 of the California Civil Code, which allows a licensed health care provider authorized to prescribe an opioid antagonist to issue a standing order for the distribution and administration of naloxone.

### Terms and Conditions

By submitting the online application form, the entity:

1. Certifies that the contact and location information provided on the online application form is correct.
2. Will ensure that any of its affiliates or subcontractors apply for their own standing order.
3. Agrees to allow the California Department of Public Health to contact the entity using the information provided on the application form.
4. Agrees to allow the California Department of Public Health to use the information provided on the application form to track the use of the standing order and conduct other public health and epidemiological surveillance activities.
5. Acknowledges that the standing order cannot be used to purchase or sell naloxone.
6. Agrees to ensure that entities and individuals receiving and administering naloxone receive opioid overdose prevention and treatment training as defined in this standing order.
7. Agrees to maintain and report information regarding the number of doses of naloxone distributed under this standing order at the time of renewal.
8. If known/available, agrees to maintain and report information upon renewal regarding the number of reversals which occurred using naloxone distributed under this standing order.
9. Agrees to re-apply for the standing order if there is a change in the information required on the online application form.
10. Agrees to maintain a copy of the standing order, which will include these terms and conditions.

### Definitions

A. "Non-prescribing entities" means organizations that do not employ or contract with a medical provider that has a license to prescribe and can issue a standing order and provide oversight for the distribution and administration of naloxone.

9/20/22, 3:32 PM

Naloxone Standing Order

B. "Opioid overdose prevention and treatment training program" means any program operated by a local health jurisdiction or that is registered by a local health jurisdiction to train individuals to prevent, recognize, and respond to an opiate overdose, and that provides, at a minimum, training in all of the following:

1. The causes of an opiate overdose.
2. Mouth to mouth resuscitation.
3. How to contact appropriate emergency medical services.
4. How to administer an opioid antagonist.

Additionally, the training program should include how to recognize an opioid overdose. An example of an "overdose prevention and treatment training program" that is registered with or operated by a local health jurisdiction includes, but is not limited to:

[Administering Naloxone - CDPH training video](#)

Director and State Public Health Officer Signature

G 68687

License Number

Tomás J. Aragón, MD, DrPH

Director and State Public Health Officer Name (printed)

7/8/21

Date

7/8/23

Expiration Date

Applying Entity Standing Order Information

This Standing Order is issued for: City of Clovis - Clovis Transit

Physical Address: 1033 5th Street, Clovis, CA 93612

Public Phone Number: (559) 324-2769

The entity agrees to all the terms and conditions specified in this Standing Order.

Expiration, Renewal and Review

This standing order will automatically expire two years from the date that it is signed. The standing order can be renewed by completing another online application form. This standing order should be reviewed carefully against the most current recommendations, and may be revised or updated if there is new information about naloxone administration.



**County of Fresno**  
**DEPARTMENT OF PUBLIC HEALTH**  
David Luchini, Director  
Dr. Rais Vohra, Interim Health Officer

September 21, 2022

Amy Hance, General Services Manager  
City of Clovis  
1033 Fifth St.  
Clovis, Ca 93612

Dear Ms. Hance,

I want to take this opportunity to thank you for your pursuit of supplying Naloxone (aka Narcan) to your local transit system. The purpose of this letter is to offer a strong letter of support and encourage the City to approve this program. As far as we are aware, you would be the first transit system that is making this life-saving medication available.

The opiate crisis is real and has a detrimental impact on the residents and visitors of this County. Fentanyl and other forms of opiates are readily available and taking lives. We acknowledge your creativity in making Narcan accessible in the Clovis Transit System.

We offer any assistance you may need to make this program successful.

Sincerely,

Daniel J. Lynch  
EMS Director

DL:jy

***Promotion, preservation and protection of the community's health***

1221 Fulton Street / P. O. Box 11867, Fresno, CA 93775  
(559) 600-3200

The County of Fresno is an Equal Employment Opportunity Employer  
[www.co.fresno.ca.us](http://www.co.fresno.ca.us) [www.fcdph.org](http://www.fcdph.org)

ATTACHMENT 2



# CITY *of* CLOVIS

## REPORT TO THE CITY COUNCIL

TO: Mayor and City Council  
 FROM: Planning and Development Services  
 DATE: October 17, 2022  
 SUBJECT: Consider Update – Hotel Parking Ratios.

**Staff:** Dave Merchen, City Planner

**Recommendation:** Consider Update

ATTACHMENTS: 1. Examples of Hotel Parking Requirements in Other Cities  
 2. Section 9.32.040 (Parking Requirements) of Development Code

### CONFLICT OF INTEREST

None.

### RECOMMENDATION

Staff recommends that the City Council review the information included in this report and consider providing direction to staff regarding an update to the parking requirements for hotel projects.

### EXECUTIVE SUMMARY

Councilmember Mouanoutoua, with Mayor Flores concurrence, requested this item be placed on the agenda. Staff has outlined the City of Clovis parking requirement and provided examples of other Central Valley city parking requirements for comparison (Attachment 1).

### BACKGROUND

The Clovis Development Code requires 1.2 parking spaces for each guest room, plus required parking spaces for accessory uses. For example, a hotel with 100 guest rooms would require 120 parking spaces. This standard accommodates guest and employee vehicles. If a hotel includes a restaurant that is open to the general public, the parking requirement for the restaurant is calculated separately. The City's Development Code was updated in October 2014; however, the parking requirement for hotels did not change from the prior Development Code.

A hotel project requires approval of a conditional use permit, which allows flexibility for modification of development standards, including parking requirements with supporting justification. Prior hotel projects have typically met parking requirements on their own site,

provided shared parking with adjacent properties or received a justified modification to the requirement.

The City of Clovis has comparable hotel parking requirements to other Central Valley cities, although a base-standard of 1 parking stall per room may be the most common criteria. A brief comparison providing examples of other nearby cities is included in Attachment 1.

If the Council determines that an adjustment to the existing parking standard should be considered, it may direct staff to bring back a specific item initiating an ordinance amendment. Alternatively, the Council may direct staff to include a modified hotel parking standard in the next set of code amendments which are brought forward for the Planning Commission and City Council's consideration. The next set of code amendments is targeted for the first quarter of 2023.

### **FISCAL IMPACT**

None.

### **REASON FOR RECOMMENDATION**

Staff has received inquiries related to the hotel parking requirement for future hotel projects. There may be interest in considering an update to the hotel parking ratios.

### **ACTIONS FOLLOWING APPROVAL**

Staff will implement the direction provided by the City Council regarding updates to the Development Code for hotel parking requirements.

Prepared by: Dave Merchen, City Planner

Reviewed by: City Manager *JH*

## EXAMPLES OF PARKING REQUIREMENTS IN OTHER CITIES

### City of Bakersfield

Hotel, motel, roominghouse – 1 space per sleeping unit (additional parking required for meeting rooms, restaurants, bars, and office space)

### City of Fresno

Bed and Breakfast – 1 per room for rent plus 1 space adjacent to registration office.

Hotels and Motels – 1 per each sleeping unit, plus 2 spaces adjacent to registration office; meeting/banquet rooms or restaurants under 1,500 sq. ft. are not required to provide additional parking when located within a hotel; additional parking shall be required for ancillary uses, such as Meeting Rooms, Banquet Centers, etc. that exceed 1,500 sq. ft.

### City of Madera

Motels – 1 space for each sleeping room, plus 1 space for each two employees

Hotels – 1 space for each three beds

### City of Modesto

Motel, Hotel- 1 space per guest room; additional spaces for restaurants, meeting facilities, and related uses

### City of Stockton

Hotels and motels – 1 per guest room + 4 + ancillary

### City of Visalia

Motels, hotels – 1 parking space for each guest room.

Each land use shall provide at least the minimum number of off-street parking spaces required by this chapter, except where a greater number of spaces is required through land use entitlement approval or where an exception has been granted through approval of a discretionary permit.

A. Parking requirements by land use. Each land use shall be provided the number of parking spaces required by Table 3-12. Additional spaces may be required through discretionary entitlement approval. All sites shall provide adequate off-street parking for the subject use in compliance with this chapter.

B. Expansion of structure, change in use. When a structure is enlarged or increased in capacity or intensity, or when a change in use requires more off-street parking, additional parking spaces shall be provided in compliance with this section. Also see Section [9.32.030](#)(E) (Nonconforming status).

C. Multi-tenant sites. A site with multiple tenants shall provide the aggregate number of parking spaces required for each separate use; except where the site was developed comprehensively as an integrated center, the parking ratio shall be that required for the center as determined through land use entitlement approval.

D. Parking required by entitlements and/or development agreements. Parking requirements established by conditional use permits, development agreements, or similar entitlements supersede the provisions of this chapter.

E. Uses not listed. Land uses not specifically listed by subsection A of this section (Parking requirements by land use) shall provide parking as required by the Director. The Director shall use the requirements of Table 3-12 as a guide in determining the minimum number of parking spaces to be provided.

F. Rounding of quantities. When calculating the number of parking spaces required, fractional spaces 0.5 or greater shall be rounded up to the nearest whole number.

G. Company-owned vehicles. The number of parking spaces required by this section does not generally include spaces needed for the parking of company-owned vehicles. Parking spaces for company-owned vehicles shall be provided in addition to the requirements for a particular land use.

H. Bicycle storage requirements. All nonresidential land uses shall provide bicycle parking/storage facilities in compliance with Section [9.32.090](#) (Bicycle storage requirements).



I. Vehicle charging stations. Vehicle charging stations shall be allowed on commercial and industrial land uses through the site plan review (SPR) process. Charging stations (stalls) shall not be counted against the required parking spaces for a commercial or industrial use. Advertising signage shall be limited to one square foot per parking space. The location of vehicle charging stations shall be approved by the City Planner.

**TABLE 3-12  
PARKING REQUIREMENTS BY LAND USE**

<b>Land Use Type: Manufacturing, Processing and Warehousing*</b>	<b>Vehicle Spaces Required</b>
Manufacturing facilities	2 spaces for each 1,000 sq. ft. of gross floor area for the first 25,000 sq. ft. and 1 space for each 1,000 sq. ft. thereafter. The gross floor area shall include incidental office space comprising less than 20% of the total gross floor area. The parking requirements for additional office space shall be calculated separately as provided by this table for "Offices."
Recycling facilities	Determined by conditional use permit.
Research and development facilities	1 space for each 350 sq. ft. of gross floor area. The gross floor area shall include incidental office space comprising less than 20% of the total gross floor area. The parking requirements for additional office space shall be calculated separately as provided by this table for "Offices."
Warehouse facilities	1 space for each 1,000 sq. ft. of gross floor area for the first 20,000 sq. ft. and 1 space for each 2,000 sq. ft. thereafter.

Note:

\* All nonresidential land uses shall provide bicycle parking/storage facilities in compliance with Section [9.32.090](#) (Bicycle storage requirements).

**TABLE 3-12  
PARKING REQUIREMENTS BY LAND USE (Continued)**

<b>Land Use Type: Recreation, Education, and Public Assembly*</b>	<b>Vehicle Spaces Required</b>
Assembly and meeting facilities Banquet halls	1 space for each 45 sq. ft. of seating area.

**TABLE 3-12  
PARKING REQUIREMENTS BY LAND USE (Continued)**

<b>Land Use Type: Recreation, Education, and Public Assembly*</b>	<b>Vehicle Spaces Required</b>
Religious institutions, cinemas, churches, performance theaters, meeting halls, and membership organizations	1 space for each 5 fixed seats or 1 space for every 40 sq. ft. of gross assembly or viewing area, plus ancillary uses (e.g., restaurant).
Theaters	1 space for each 4 fixed seats; where no fixed seats are provided, 1 space for every 35 sq. ft. of gross viewing area.
Child day care Centers	1 space for each 6 children, plus permanent drop-off area as approved by the Director employee.
Large family day care homes	1 space for each 6 children, plus permanent drop-off area as approved by the Director employee.
Indoor recreation/fitness centers	
Dance halls	1 space for each 50 sq. ft. of gross dance floor area.
Arcades	1 space for each 250 sq. ft. of gross floor area.
Bowling alleys	1 space for each employee plus 5 spaces for each alley, plus required spaces for ancillary uses.
Health/fitness facilities	1 space for each 100 sq. ft. of gross floor area.
Pool and billiard rooms	2 spaces for each table, plus required space for ancillary uses.
Skating rinks	1 space for each 50 sq. ft. of gross floor area of skating area, plus required spaces for ancillary uses.
Libraries, museums, art galleries	1 space for each 300 sq. ft. of gross floor area.
Outdoor commercial recreation	Determined by conditional use permit.
Park/recreational	1 space for each 5,000 sq. ft. of active gross recreation area.
Swimming pools	1 space for each 500 sq. ft. of pool area, plus 1 space for each employee.
Water slides	4 spaces for each slide lane.

**TABLE 3-12  
PARKING REQUIREMENTS BY LAND USE (Continued)**

<b>Land Use Type: Recreation, Education, and Public Assembly*</b>	<b>Vehicle Spaces Required</b>
Schools (public/private)	
Preschool	1 space for each faculty and employee member.
Elementary/junior high	1 space for each faculty and employee member.
High school	1 space for each faculty and employee member, plus 1 space for each 8 students regularly enrolled.
Colleges, universities, trade and business schools	1 space for each 2 faculty and employee members, plus 1 space for each 2 full-time (or equivalent) enrolled students.
Technical or trade schools	1 space for each 2 faculty and employee members, plus 1 space for each 2 full-time (or equivalent) enrolled students. Calculation of student enrollment shall be based on fire occupancy loads.

Note:

\* All nonresidential land uses shall provide bicycle parking/storage facilities in compliance with Section [9.32.090](#) (Bicycle storage requirements).

**TABLE 3-12  
PARKING REQUIREMENTS BY LAND USE (Continued)**

<b>Land Use Type: Residential Uses</b>	<b>Vehicle Spaces Required</b>
Accessory residential dwelling units	1 space in addition to that required for a single-family unit.
Condominiums	2 covered spaces for each unit, plus 1 covered or uncovered guest space for each dwelling unit.
Domestic violence shelters	Determined by conditional use permit or Director.
Group quarters (including boardinghouses, rooming houses, dormitories, and organizational houses)	1 space for each sleeping room.
Mixed use developments	Determined by conditional use permit or Mixed Use zoning.

**TABLE 3-12  
PARKING REQUIREMENTS BY LAND USE (Continued)**

<b><u>Land Use Type:</u> Residential Uses</b>	<b>Vehicle Spaces Required</b>
Mobile home parks	1 covered space in conjunction with each mobile home, plus 1 space for each 10 mobile homes or sites for guest parking. The latter to be provided in the mobile park separate from the mobile home spaces.
Multifamily dwellings, duplex units, and other attached dwellings	Studio, 1 and 2 bedroom units – 2 spaces for each dwelling unit, of which at least 1 shall be covered. 3 or more bedroom units – 3 spaces for each dwelling unit, of which at least 1 shall be covered.
Residential planned unit developments	2 covered (garage or carport**, ***) spaces, plus 1 covered or uncovered guest space for each dwelling unit
Senior housing projects, semi-independent/dependent units	0.5 space for each unit with half the spaces enclosed, plus 1 guest parking space for each 10 units.
Senior housing projects, independent	1.25 spaces for each unit, plus 1 space for each employee or as established by conditional use permit.
Senior assisted living facility	1 space for each 400 sq. ft. of gross floor area, plus 1 space for each 3 employees.
Single-family dwellings	2 covered (garage or carport**, ***) spaces for each dwelling unit.

Notes:

\*\* Each two (2) car garage or carport shall have and maintain a clear inside dimension of at least twenty feet (20') by twenty-two feet (22'). If a third car bay is provided, it shall have and maintain a clear inside dimension of at least ten feet (10') by twenty feet (20').

\*\*\* Tandem parking shall not be allowed to satisfy this garage requirement. The Director of Planning and Development Services may approve offset garages through the administrative use permit (AUP) approval process.

**TABLE 3-12  
PARKING REQUIREMENTS BY LAND USE (Continued)**

<b>Land Use Type: Retail Trade*</b>	<b>Vehicle Spaces Required</b>
<p>The following retail trade uses shall provide the identified number of vehicle spaces for the type of use, except when the use is located within a shopping center. If located within a shopping center, the use (except for “big-box”) shall provide the number of spaces identified for shopping centers. (See shopping centers, below.)</p>	
<p>Automobile, mobile home, recreational vehicle sales</p>	<p>5 stalls per acre shall be designated customer/employee parking, with a minimum of 5 customer/employee parking stalls provided.</p>
<p>Machinery and parts sales</p>	<p>1 space for each 800 sq. ft. of gross floor area.</p>
<p>Bookstores</p>	<p>1 space for each 200 sq. ft. of gross sales area, plus 1 space for each 600 sq. ft. of storage area.</p>
<p>Building materials, hardware stores, and plant nurseries</p>	<p>1 space for each 300 square feet of gross floor area, plus 1 space for each 1,000 square feet of gross land area.</p>
<p>Building material/hardware stores with plant nurseries housed in a “big-box” environment (e.g., Home Depot, Lowe’s, etc.)</p>	<p>4.7 spaces for each 1,000 square feet of gross floor area.</p>
<p>Office supply stores</p>	<p>See commercial/service uses parking standard.</p>
<p>Plant nurseries/garden centers in conjunction with retail uses</p>	<p>1 space for each 1,500 sq. ft. of outdoor display area, plus 1 space for each 300 sq. ft. of gross floor area.</p>
<p>Restaurants, taverns, lounges, or similar establishments for the consumption of food and beverages on the premises</p>	<p>5.4 spaces for each 1,000 sq. ft. of gross building area, including indoor and outdoor dining areas.</p>
<p>Drive-through (no seating)</p>	<p>1 per employee.</p>
<p>Fast food (freestanding) eating establishments</p>	<p>1 per 75 sq. ft.</p>
<p>Restaurants, delicatessens, takeout only – no customer seating</p>	<p>1 space for each 250 sq. ft. of gross floor area.</p>
<p>Retail stores, general merchandise</p>	<p>See commercial/service uses parking standard.</p>

**TABLE 3-12  
PARKING REQUIREMENTS BY LAND USE (Continued)**

<b>Land Use Type: Retail Trade*</b>	<b>Vehicle Spaces Required</b>
Shopping centers (commercial multi-tenant) (neighborhood, community, and regional)	See commercial/service uses parking standard.

Note:

\* All nonresidential land uses shall provide bicycle parking/storage facilities in compliance with Section [9.32.090](#) (Bicycle storage requirements).

**TABLE 3-12  
PARKING REQUIREMENTS BY LAND USE (Continued)**

<b>Land Use Type: Services*</b>	<b>Vehicle Spaces Required</b>
The following service uses shall provide the identified number of vehicle spaces for the type of use, except when the use is located within a shopping center. If located within a shopping center, the use shall provide the number of spaces identified for shopping centers. (See “shopping centers” in previous table.)	
Child day care centers	1 space for each 6 children, plus permanent drop-off area as approved by the Director.
Commercial/service uses, including commercial multi-tenant users	
0 to 20,000 sq. ft.	5.4 spaces for each 1,000 sq. ft. of gross floor area.
20,001 to 70,000 sq. ft.	5.0 spaces for each 1,000 sq. ft. of gross floor area.
70,001 sq. ft. and over	4.7 spaces for each 1,000 sq. ft. of gross floor area.
Depots: bus, freight	Determined by conditional use permit.
Equipment rentals	1 space for each 300 sq. ft. of floor area, plus 1 space for each 1,000 sq. ft. of outdoor use area.
Fuel sales (standalone)	2 spaces minimum, plus any additional as may be determined by conditional use permit.
Health and fitness facilities	1 space for each 100 sq. ft. of gross floor area.
<b>Hotels and motels</b>	<b>1.2 spaces for each guest room, plus required spaces for accessory uses.</b>

**TABLE 3-12  
PARKING REQUIREMENTS BY LAND USE (Continued)**

<b>Land Use Type: Services*</b>	<b>Vehicle Spaces Required</b>
Kennels, animal boarding, and veterinary clinics	1 space for each 500 sq. ft. of gross floor area, plus one space for each 800 sq. ft. of boarding area.
Laundry and dry cleaning	1 space for each 350 sq. ft. of activity area, plus 1 space for each 1,000 sq. ft. of storage area.
Laundry, self-serving	1 space for each 3 machines.
Medical services Board and care homes, group home care facilities, and in-patient drug treatment facilities	1 space for each 5 beds.
Clinics, medical/dental offices	8 spaces for first doctor, plus 5 spaces for each additional doctor.
Convalescent hospitals	1 space for each 3 beds the facility is licensed to accommodate.
Hospitals	To be determined by conditional use permit.
Medical/dental labs	1 space for each 250 sq. ft. of gross floor area.
Mixed use	Established with the Master Plan or Mixed Use zoning for the site.
Mortuaries and funeral homes	1 space for each 5 fixed seats or 1 space for each 40 square feet, whichever amount is greater.
Offices, business professional	1 space for each 250 sq. ft. of gross floor area.
Personal services – barber/beauty shops (and other personal services)	1 space for each 200 sq. ft. of gross floor area.
Pet grooming	1 space for each 400 sq. ft. of gross floor area.
Public facilities	As established with the authorizing approval.
Service stations	1 space for each 200 sq. ft. of gross floor area, plus 3 spaces for each service bay.
Storage, personal storage facilities	2 spaces minimum, plus 1 space for each 250 sq. ft. of gross office floor area.
Veterinary hospitals/clinics	1 space for each 250 sq. ft. If boarding is offered, kennel standards will be used.
Vehicle repair and maintenance	

**TABLE 3-12  
PARKING REQUIREMENTS BY LAND USE (Continued)**

<b>Land Use Type: Services*</b>	<b>Vehicle Spaces Required</b>
Repair garages**	1 space for each 300 sq. ft. of gross floor area, or 3 spaces for each bay, whichever is greater, plus 1 space for a company vehicle.
Self-service vehicle washing	2 spaces for each washing stall, for queuing and drying.
Full-service vehicle washing	1 space for each 250 sq. ft. of gross floor area, plus 10 spaces for each wash lane for drying area.

Notes:

\* All nonresidential land uses shall provide bicycle parking/storage facilities in compliance with Section [9.32.090](#) (Bicycle storage requirements).

\*\* All employee parking shall take place on site. Employee parking in the public street shall be prohibited. If employee parking in the public street occurs, it shall constitute grounds for revocation of the conditional use permit in compliance with Section [9.92.060](#) (Revocation and modifications).

**TABLE 3-12  
PARKING REQUIREMENTS BY LAND USE (Continued)**

<b>Land Use Type: Transportation and Communication</b>	<b>Vehicle Spaces Required</b>
Broadcast studios	1 space for each 400 sq. ft. of gross floor area.
Recording studios	1 space for each 250 sq. ft. of gross floor area.
Transportation facilities	To be determined by Commission.

(§ 2, Ord. 14-13, eff. October 8, 2014; § 1 (Att. 3), Ord. 18-19, eff. September 5, 2018; § 1(2) (Atts. 1, 2), Ord. 20-18, eff. February 3, 2021)