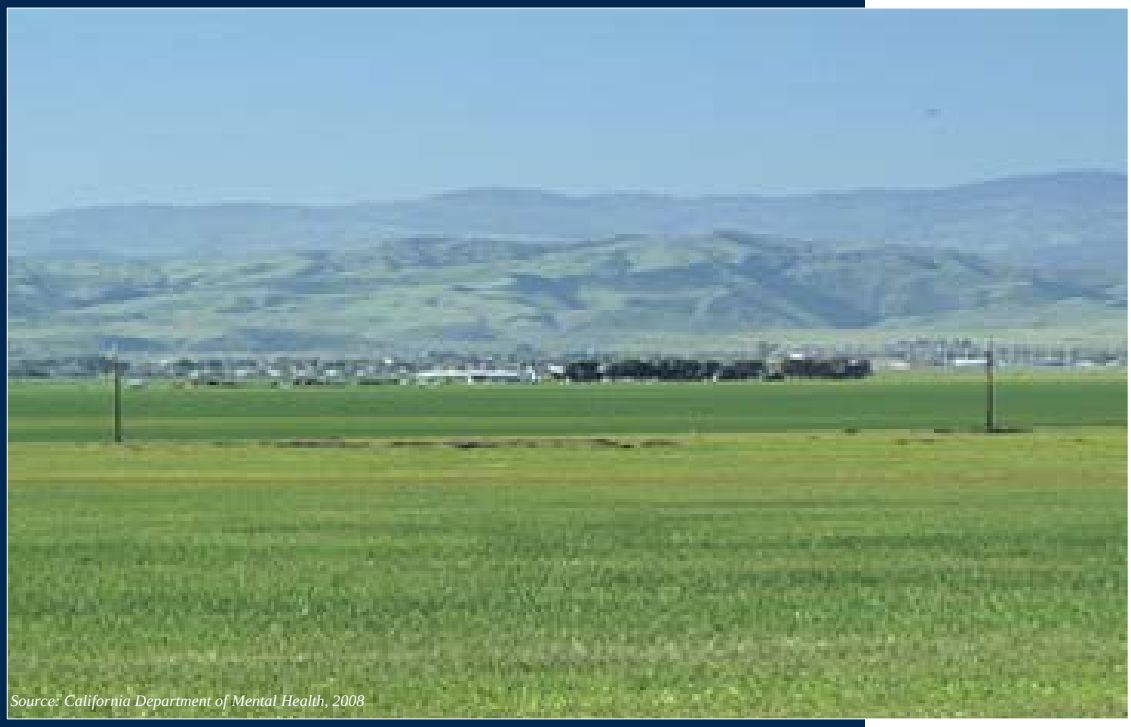
FINAL

Master Environmental Impact Report

for the

City of Coalinga 2025 General Plan Update

SCH #: 2005021140



Source: California Department of Mental Health, 2008

Prepared for

City of Coalinga
Community Development Department
155 W. Durian Avenue
Coalinga, CA 93210

May 2009

MORRO GROUP, INC.
A DIVISION OF
SWCA
ENVIRONMENTAL CONSULTANTS

City of Coalinga 2025 General Plan Update
SCH# 2005021140

Final

MASTER ENVIRONMENTAL IMPACT REPORT

Prepared for:

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City of Coalinga
Community Development Department
155 W. Durian Avenue
Coalinga, CA 93210

Prepared by:



May 2009

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I. INTRODUCTION

This Master Environmental Impact Report (MEIR) addresses the potential environmental impacts associated with the implementation of the proposed *City of Coalinga General Plan Update 2025*, hereafter to be referred to as the "proposed General Plan." Specific General Plan Elements to be updated include Land Use, Open Space and Conservation, Circulation, Safety, Air Quality, Noise, and Public Facilities and Services. The State required Housing Element is not a part of this update. The proposed General Plan includes expanded Sphere of Influence (SOI) and Area of Interest (AOI) boundaries.

A. MASTER EIR STATEMENT OF PURPOSE AND NEED

A Master EIR as described in CEQA provides a "detailed environmental review of plans and programs upon which the approval of subsequent related development proposals can be based" by evaluating the "cumulative impacts, growth inducing impacts, and irreversible significant effects on the environment of specific, subsequent projects". A Master EIR has the effect of streamlining future developments that are consistent with the Master EIR and the "general plan, element, general plan amendment, or specific plan" (CEQA *Guidelines* §21157). A significant environmental impact is defined in CEQA as a substantial, or potentially substantial adverse change in any of the physical conditions within the area affected by the proposed development (CEQA *Guidelines* §15358).

The Master EIR identifies the following levels of impact:

- **Significant and Unavoidable Impact**
  A significant and unavoidable impact is a significant adverse effect on the physical environment that cannot be reduced to less than significant even if reasonable mitigation measures are incorporated into the project.

- **Significant but Mitigable Impact**
  A significant adverse impact that can be minimized or when feasible mitigation measures are applied which could minimize the significance of the adverse impact.

- **Less than Significant Impact**
  A less than significant impact is an effect that is determined not to have a substantial adverse impact on the physical environment.

Impact evaluation criteria are presented for each issue examined in the EIR. The purpose of the criteria is to establish the thresholds required to make a determination if a significant impact will result from the proposed project. This enables those reviewing this document to understand how determinations about impacts were made. In establishing these criteria, the EIR relies to the greatest degree possible on local standards, existing laws, and governmental regulations.

In this report, information is organized to clearly address, analyze and communicate potentially significant impacts. Each study area includes a section in which the significance of the impacts and the probable effectiveness of proposed mitigation measures are discussed.

B. PROJECT BACKGROUND

The *City of Coalinga General Plan 2015* was adopted in 1994. The proposed *City of Coalinga General Plan 2025* was prompted by several factors, including the problematic format of the existing General Plan and growth pressure outside the city's northern corporate limits and the existing SOI boundary. The intent is to ensure that the General Plan accurately portrays the anticipated growth patterns, population figures, and land uses in the City of Coalinga.

C. MASTER EIR PROCESS

This document was prepared in accordance with the requirements of the California Environmental Quality Act (CEQA) of 1970 (Public Resources Code 21000 et seq.) and the State CEQA *Guidelines* (14 California Code Regulations, 15071) as amended. Contents of the MEIR are somewhat different than a project EIR and will follow the guidelines specified in §21157 of the CEQA *Guidelines*. In addition to the items otherwise required of all EIRs pursuant to §21100, a MEIR must include the following additional information:

"A description of each anticipated subsequent project that is to be considered within the scope of the MEIR, including information with regard to the kind, size, intensity, and location of the subsequent projects. The accuracy and completeness of these descriptions is crucial to the use of the MEIR in streamlining subsequent project approvals. The descriptions must include, but are not limited to all of the following (refer to CEQA *Guidelines* §15176):

- "The specific type of project to be undertaken."
- "The maximum and minimum intensity of any anticipated subsequent project." Subsequent "projects exceeding the envelope would require additional analysis- those within the envelope might not."
- "The anticipated location and alternative locations for any subsequent development projects."
- "A capital outlay or capital improvement program or other scheduling or implementing device that governs the submission and approval of subsequent projects." Details on how the jurisdiction will provide sufficient infrastructure and associated financing for anticipated projects must be included. For public works projects, the mechanism and availability of allocating capital funds must be included. "Alternatively, the Master EIR may specify why particular planning considerations make it impractical to identify any such program or scheduling at the time the MEIR is prepared."
- "A description of the potential impacts of anticipated projects for which there is not sufficient information reasonably available to support a full assessment of potential impacts in the Master EIR. […] The scope of a focused EIR is not limited to the potential impacts described in the Master EIR" (CEQA *Guidelines* §21157).

Once a MEIR is certified along with a general plan amendment, subsequent developments (consistent with the MEIR and the general plan amendment) and associated approval processes are streamlined.

1. Scoping Process

In compliance with State CEQA *Guidelines*, the City as the lead agency has taken steps to maximize opportunities to participate in the environmental process. During the Environmental Determination process, an effort was made to contact various federal, state, regional and local governmental agencies and other interested parties to solicit comments and inform the public of the proposed General Plan. This included the first distribution of the Initial Study, Notice of Preparation (IS/NOP) on June 3, 2002, and the re-noticed IS/NOP on October 30, 2006. The proposed General Plan was described, potential environmental effects were identified, and agencies and the public were invited to review and comment on the NOP. The close of the most recent NOP review period was December, 2006. The IS/NOP and comment letters received during the NOP review period are included in Appendix A of this MEIR. Agencies, organizations, and interested parties not contacted or who did not respond the request for comments about the project during the preparation of the draft MEIR currently have the opportunity to comment during the 45-day public review period on the draft MEIR. Scoping meetings were held in the City of Coalinga on April 26th and May 31st, 2007. Comments were received at both meetings. A Draft MEIR was released in October, 2007 and agencies and the public made comments. Subsequently, the City decided to pursue an alternative land use scenario. This updated Draft MEIR includes that land use scenario and addresses comments made on the previous draft, as applicable.

2. Master EIR Contents

The MEIR is divided into the following major sections:

Introduction. Provides the purpose of an MEIR, scope and content of the document, and the use of the document.

Summary. Provides a brief summary of the project description including subsequent projects, impacts and mitigation measures, alternatives, growth inducing impacts, the mitigation monitoring program, any areas of known controversy, and any issues to be resolved.

Project Description. Provides the general background of the proposed General Plan, objectives, a detailed description of the project characteristics including subsequent projects, a listing of the necessary permits and government approvals, and a description of anticipated subsequent projects.

Environmental Setting. Describes the physical setting and surrounding land uses as they existed at the time the IS/NOP was published.

Environmental Impacts and Mitigation Measures. Discusses the environmental setting as it relates to the various issue areas, regulatory setting, thresholds of significance, impact assessment and methodology, project-specific impacts and mitigation measures, cumulative impacts and residual impacts. The following are the potentially significant environmental effects identified during the preparation of the IS/NOP, which will be addressed in this MEIR.

- Land Use, Population, and Housing
- Biological Resources
- Geology and Soils
- Cultural Resources
- Drainage, Erosion Sedimentation
- Greenhouse Gas Emissions
- Public Services
- Public Utilities
- Transportation and Circulation
- Air Quality
- Noise
- Aesthetic Resources

Alternatives. Summarizes the environmental advantages and disadvantages associated with the proposed General Plan and the alternatives. Consistent with CEQA, the alternative analysis discusses impacts on a qualitative level as opposed to the specific quantitative analysis given to the proposed General Plan described in the previous section. Based on this discussion, the environmentally superior alternative is identified as required by CEQA. As required, the "No Action" alternative is included among the alternatives considered. If the No Action alternative is the environmentally superior alternative, then an environmentally superior alternative is chosen from the other alternatives.

Environmental Analysis. This section identifies growth inducing impacts, including the spatial, economic, and/or population growth impacts that may result from development of the proposed project. Discussion also includes irreversible environmental changes, and significant unavoidable changes.

Mitigation Monitoring and Reporting Plan. This section contains a listing of all mitigation measures proposed as part of the MEIR, the methods by which they will be implemented, and the method by which success criteria will be measured, and the remediation measures should success criteria not be met.

D. AGENCY USE OF THE DOCUMENT

The City of Coalinga, as the CEQA lead agency, is responsible for administering the preparation of the MEIR and will be responsible for certifying the Final MEIR. Lead agency decision makers (i.e., the City of Coalinga City Council) will use the document as an informational document to assist in the decision-making process, ultimately resulting in the adoption of the *City of Coalinga 2025 General Plan Update.*

E. REVIEW OF THE MASTER EIR

In accordance with §15121 of the State CEQA *Guidelines,* the purpose of this MEIR is to serve as an informational document that:

> *...will inform public agency decision makers and the public generally of the significant environmental effects of the project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project.*

1. Draft Master EIR

The Draft MEIR will be circulated for agency and public review during a 45-day public review period which ends on January 2, 2009. Morro Group, a Division of SWCA (Morro Group/SWCA) will review comments received by the City of Coalinga on the Draft MEIR, and the comments and responses to comments will be included in the Final MEIR. Copies of the Draft MEIR will be available at the City of Coalinga Community Development Department, Coalinga, California, and at the Coalinga Huron Library District, 305 North 4th Street, Coalinga, California. The review period during which agencies and the general public may comment is specified in the cover letter to the MEIR.

On behalf of the lead agency, comments on the Draft EIR shall be addressed to:

Mr. Bill Skinner
City Manager
City of Coalinga
c/o Mary B. Reents
Morro Group – A Division of SWCA
1422 Monterey Street, Suite C200
San Luis Obispo, CA 93401
mreents@swca.com

2. Final Master EIR

The Final MEIR contains the comments received during the Draft MEIR review period and the responses. Any changes to the MEIR resulting from the responses to comments will be made and will be marked by a vertical line in the left margin. The Final MEIR will contain letters received during the public comment period. Each letter is followed by the MEIR consultant responses to significant environmental points raised in the comments or questions in the letter.

The Final MEIR will be used by the City of Coalinga for consideration of the merits of the proposed General Plan under the provisions of CEQA. If the MEIR is certified and adopted by the City of Coalinga, it may then be used to make decisions on discretionary actions required for approval of the proposed General Plan and facilitate environmental review of subsequent individual projects within the scope of the Final MEIR. Mitigation measures identified in the MEIR would be included as conditions of project approval.

3. Master EIR Findings

It is not the purpose of an MEIR to recommend either approval or denial of a project. CEQA requires the decision-makers (in this case, the City of Coalinga) to make a decision with knowledge of the potential environmental impacts of the project, and to balance the benefits of the proposed project against its potential environmental impacts (CEQA *Guidelines* §15091).

Although the MEIR does not dictate the ultimate decision on the project, the decision-makers must consider the information in the MEIR and address each significant effect identified in the MEIR. If significant adverse environmental effects are identified in the MEIR, approval of the project must be accompanied by written findings, including the following possible findings:

- Changes or alternations in the project have been required in, or incorporated into, the project, which avoid or substantially lessen the significant environmental effects as identified in the final MEIR.

- Changes or alterations are within the responsibility and jurisdiction of another public agency and not the City. Such changes have been adopted by such other agency or can and should be adopted by such other agency.

- 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 final MEIR.

4. Use of Master EIR by Other Agencies

The certified MEIR may be used to meet the environmental review requirements for any State or Federal Agency Permits. Agencies that may use the MEIR to assist decision-making include the State of California, the County of Fresno, and the Local Agency Formation Commission (LAFCO).

F. PROJECT SPONSORS AND CONTACT PERSONS

Key contact persons are as follows:

Lead Agency:	City of Coalinga Mr. Bill Skinner City Manager 155 West Durian Coalinga, CA 93210
Environmental Consultant:	Morro Group – A Division of SWCA Ms. Mary B. Reents, Senior Consultant 1422 Monterey Street, Suite C200 San Luis Obispo, CA 93401

II. SUMMARY

A. PROJECT LOCATION

The City of Coalinga is situated in Pleasant Valley at the base of the coast mountain range on the western side of California's Central Valley within Fresno County. Interstate 5 runs north to south approximately ten miles east of the city.

B. PROJECT OBJECTIVES

The *City of Coalinga General Plan 2015* was approved in 1994. The proposed Update was prompted by several factors, including the problematic format of the existing General Plan and growth pressure outside the city's northern corporate limits and the existing SOI boundary. The intent of the update is to ensure that the General Plan accurately portrays anticipated growth patterns, population figures, and land uses in the City of Coalinga.

C. PROJECT DESCRIPTION

The project description includes the proposed General Plan, expansion of the City Planning Areas, and a number of specific projects located within and adjacent to the existing city limits.

1. General Plan Update

The proposed General Plan is primarily a policy document. It was prepared based on the State of California General Plan Guidelines and Title 14, Division 5.5 of the California Code of Regulations, §13506 through §13514. The proposed General Plan includes Land Use, Open Space, Circulation, Safety, Air Quality, Noise, Public Facilities, and Public Services Elements. The Housing Element has been updated separately in 2004. Each Element in the proposed General Plan includes specific goals, policies, and implementation measures. Buildout of the proposed General Plan would increase the city's population from approximately 12,000 residents to approximately 55,373 residents in the Year 2025.

2. Planning Areas Expansion

The city limits currently contain approximately 4,541 acres as shown in Table 2-1 in the proposed General Plan. The city's existing Sphere of Influence (SOI) surrounds the historical core of Coalinga and currently consists of an additional 2,288 acres. The proposed General Plan would expand the SOI to 7,892 acres. The SOI area has been proposed to take advantage of existing roadway patterns, utility infrastructure, commercial areas, and recreational opportunities to the extent feasible. The proposed General Plan will also expand the city's Area of Interest (AOI) from 11,581 to 41,146 acres, for a total acreage increase from the current 18,410 acres to a proposed 53,579 acres, or an increase of approximately 191 percent.

3. Subsequent Projects

There are a number of current residential and commercial proposals considered in the MEIR. These are shown in Tables III-3 and 4. Based on data from the City of Coalinga and upon review of the General Plan, the projects shown in Table III-5 will most likely be proposed subsequent to certification of this MEIR, in addition to overall development as outlined in the

proposed General Plan, consistent with CEQA *Guidelines* §15176(d). This section of the *Guidelines* clarifies that the City is not required to identify or list subsequent projects by name in order for them to qualify for streamlined environmental review. A subsequent project consistent with the land use designation and permitted density and intensity of development established in that plan is considered to be within the scope of the Master EIR.

D. SUMMARY OF IMPACTS AND MITIGATION MEASURES

The proposed General Plan resulted in both significant and unavoidable impacts and significant but mitigable impacts. These impacts are summarized in Tables II-1 and II-2 below. Mitigation Measures have been proposed to reduce significant and unavoidable impacts, although in some cases, the impacts could not be reduced to a level of insignificance. Mitigation Measures necessary for reducing significant but mitigable impacts to a less than significant level have been incorporated into the proposed General Plan as Policies and Implementation Measures. As a result, the proposed General Plan is "self-mitigating" to the extent feasible. These Policies, which were either proposed originally, or developed after the environmental analysis of the implementation of the proposed General Plan, are also shown in the following tables.

E. SUMMARY OF ALTERNATIVES

Three Alternatives were considered in the EIR. Alternative 1, the "No Project Alternative" assumes that the proposed General Plan is not adopted by the City of Coalinga and that new development would be guided by the existing General Plan, adopted in 1994. Buildout under this General Plan would result in an ultimate population of approximately 16,300 by 2015, and assumes infrastructure improvements and increased services necessary to accommodate that growth would occur.

Alternative 2 - Reduced Buildout Alternative shows the results of adopting a new General Plan, but one with a less intensive land use concept. The organization of land uses is the same as in the proposed General Plan, although the acreage devoted to land uses is less (refer to Table VI-2 and Figure VI-1). This alternative would incorporate all of the proposed Policies and Implementation Measures contained within the proposed General Plan.

Alternative 3 – Reduced Buildout/Increased Density utilizes the same SOI boundary as Alternative 2, but increases the residential densities to allow the city's population to grow at the same level expected under the proposed General Plan (refer to Table VI-3 and Figure VI-2). The proposed SOI area would be approximately 3,180 acres as with Alternative 2. The acreage devoted to the Manufacturing/Business land use and the Residential Ranchette land use would be reduced. Acreage devoted to the Residential Estate land use would be reduced, while that designated for Residential Single Family, Medium Density, and High Density would be increased to allow for greater population growth in a smaller area.

The environmentally superior alternative is judged to be the Reduced Buildout Alternative. It would reduce the intensity of the significant and unavoidable impacts to Air Quality, Agricultural Resources, Biological Resources, Transportation and Circulation, and Public Utilities (water) identified in the MEIR and would appear to accommodate a fairly aggressive growth rate projected by the Department of Finance and desired by the City of Coalinga.

TABLE II-1 – Significant and Unavoidable Impacts Unavoidable Significant Environmental Impacts (Decision-maker must issue a "Statement of Overriding Considerations" under CEQA *Guidelines* §15093 if the project is approved.)			
Description of Impact	Short/ Long-term	Mitigation Measure Summary	Residual Impact
BIOLOGICAL RESOURCES (BIO)			
BIO Impact 1 Implementation of the proposed General Plan could significantly impact sensitive species and sensitive habitats (including wetlands) within and adjacent to the City boundaries.	Long-term	New policies in the proposed Conservation and Open Space Element of the proposed General Plan would reduce potential significant impacts and have been incorporated into the proposed General Plan. These policies are listed below: OSC1-1, OSC1-2, OSC1-3, and OSC1-4.	Significant
AGRICULTURAL RESOURCES (AG)			
AG Impact 1 Implementation of the proposed General Plan would convert approximately 5,111 acres of Prime Farmland and 1,009 acres of Farmland of Statewide Importance to non-agricultural use.	Long-term	Policy LU7-2 directly addresses impacts related to conversion of agricultural lands by requiring development projects shall be required to mitigate for loss of farmland by either (1) granting a farmland conservation easement to or for the benefit of the City and/or a qualifying entity approved by the City, at a 1:1 ratio for each acre developed, or (2) by payment of an in lieu fee as established by the City, which shall be reviewed and adjusted periodically to ensure that the fee is adequate to offset the cost of purchasing farmland conservation easements at a 1:1 ratio.	Significant
AG Impact 2 Implementation of the proposed General Plan would result in the loss of 4,466 acres of farmland currently enrolled in the Williamson Act program.	Long-term	See discussion and mitigation measures for AG Impact 1 above.	Significant
AG Impact 3 Implementation of the proposed General plan would result in the loss of approximately 6,200 acres of agriculturally productive land, resulting in a potential primary loss of approximately $8,600,000 and a secondary economic loss of $30,100,000.	Short-term/ Long-term	See discussion and mitigation measures for AG Impacts 1 and 2 above.	Significant

TABLE II-1 – Significant and Unavoidable Impacts Unavoidable Significant Environmental Impacts (Decision-maker must issue a "Statement of Overriding Considerations" under CEQA *Guidelines* §15093 if the project is approved.)			
Description of Impact	Short/ Long-term	Mitigation Measure Summary	Residual Impact
PUBLIC UTILITIES (PU)			
PU Impact 1 Implementation of the proposed General Plan will result in municipal water demand exceeding the City's existing supply.	Long-term	The following policies and their associated implementation measures are focused on efficiently utilizing water resources, developing infrastructure, and examining possibilities for utilizing treated waste water to augment existing supplies. Policies and implementation measures that reduce impacts have been included in the proposed General Plan and are listed as follows: PFS8-1 PFS8-2, and PFS8-3.	Significant
TRANSPORTATION AND CIRCULATION (TC)			
TC Impact 1 Implementation of the proposed General Plan would result in a substantial increase in the number of vehicle trips, and exceed LOS standards established by the City of Coalinga for designated intersections, roads and highways in the urban areas.	Long-term	New policies in the proposed General Plan and their associated implementation measures would reduce potential circulation impacts. Proposed General Plan policies that would reduce significant impacts include: LU1-4, LU1-5, C1-1, C1-2, C1-3, C1-4, C1-5, C1-6, C1-7, C2-1, and C3-1.	Significant
TC Impact 2 Implementation of the proposed General Plan would result in a substantial increase in the number of vehicles trips, and contribute to an exceedance of LOS standards established by the County of Fresno and Caltrans for designated intersections, roads and highways in the rural areas.	Long-term	New policies in the proposed General Plan and their associated implementation measures would reduce potential impacts but not to a less than significant level. These policies include: C1-2 and C1-6.	Significant
AIR QUALITY (AQ)			
AQ Impact 2 Implementation of the proposed General Plan would result in emissions of ozone precursors (NOx, ROG) and other pollutants from mobile, area and stationary sources.	Long-term	Table 5-9 in the Air Quality Element includes 23 measures that can be incorporated into projects to reduce operational emissions. The policies are located in the Air Quality and the Circulation Elements and include the following: C1-6, C1-7, C2-1, C3-1, AQ1-1, AQ2-1, AQ2-2, and AQ4-1.	Significant

TABLE II-1 – Significant and Unavoidable Impacts Unavoidable Significant Environmental Impacts (Decision-maker must issue a "Statement of Overriding Considerations" under CEQA *Guidelines* §15093 if the project is approved.)			
Description of Impact	Short/ Long-term	Mitigation Measure Summary	Residual Impact
CLIMATE CHANGE/GREENHOUSE GASES (CC)			
CC Impact 1 Construction equipment would emit approximately 50,000 tons of CO2 annually during buildout of the General Plan between the years 2011 and 2024	Long-term	Policies in the Air Quality Element address construction emissions, primarily, ROG and NOx, but these measures would also reduce CO2 emissions resulting from construction activities. These policies include the following: AQ1-1, AQ4-1, and AQ5-1.	Significant
CC Impact 2 Implementation of the General Plan would increase operational emissions of GHGs by more than 500 percent, to 426,000 tons annually by the year 2025.	Long-term	Policies in the Air Quality and Circulation Elements address operational GHG emissions. Policies that include Implementation measures that mitigate GHG emissions include the following: AQ5-1, AQ5-2, C1-4, and C1-6, LU1-1, LU1-5, LU1-6, LU5-2.	Significant

TABLE II-2 – Significant but Mitigable Impacts
Significant Environmental Impacts That Can be Feasibly Mitigated or Avoided
(Decision-maker must issue "Findings" under CEQA *Guidelines* §15091(a) if the project is approved)

Description of Impact	Short/ Long-term	Mitigation Measure Summary	Residual Impact
GEOLOGY (GEO)			
GEO Impact 1 Seismic hazards will expose people and structures to potential, substantial adverse seismic effects, including the potential risk of loss, injury, or death involving strong seismic shaking or seismically induced ground failure.	Long-term	Conformance with the UBC, which is required for all new development and new policies in the proposed General Plan, would reduce potential impacts to a less than significant level. These policies have been incorporated into the proposed General Plan and are listed below: S1-1, S2-1, and S2-2.	None
GEO Impact 2 Development on expansive soils can expose property improvements to adverse effects, resulting in reduced foundation, roadway, and utility line integrity.	Long-term	Geotechnical review required by City ordinance and implementation of policy S2-2 above would reduce potential impacts associated with expansive soils to less than significant levels.	None
GEO Impact 3 Implementation of the proposed General Plan will increase the amount of incompatible land uses (i.e., residential) located in the proximity of the existing surface mining operation, potentially adversely affecting the long-term viability of the operation.	Long-term	Policies and implementation measures that reduce impacts to a less than significant level have been included in the proposed General Plan and are listed as follows: OSC4-1, C1-2, AQ3-1, AQ4-1, and N1-2.	None
DRAINAGE, EROSION, AND SEDIMENTATION (DES)			
DES Impact 1 Implementation of the proposed General Plan would potentially subject people and structures to flooding.	Long-term	New policies in the proposed General Plan, along with implementation of the existing Flood Hazard Management Ordinance, would reduce potential impacts to a less than significant level. These policies are listed below: S2-1 and S2-3.	None
DES Impact 2 Implementation of the proposed General Plan would result in additional construction in undeveloped areas, increasing erosion and sedimentation.	Long-term	A new policy in the proposed General Plan would reduce potential impacts to or from drainage, erosion, and sedimentation; this policy is listed below: S3-1.	None

TABLE II-2 – Significant but Mitigable Impacts
Significant Environmental Impacts That Can be Feasibly Mitigated or Avoided
(Decision-maker must issue "Findings" under CEQA *Guidelines* §15091(a) if the project is approved)

Description of Impact	Short/ Long-term	Mitigation Measure Summary	Residual Impact
DES Impact 3 Implementation of the proposed General Plan would contribute runoff water potentially exceeding the capacity of existing or planned stormwater drainage systems.	Long-term	Policies and implementation measures that reduce impacts to a less than significant level have been included in the proposed General Plan and are listed as follows: PFS8-1, PFS8-2, S2-3, and S3-1.	None
CULTURAL RESOURCES (CR)			
CR Impact 1 Implementation of the proposed General Plan could result in disturbance, alteration, or destruction of subsurface archaeological prehistoric resources, or in devaluation, disturbance, alteration, or destruction of historic areas, sites, and structures.	Long-term	Policies and implementation measures that reduce impacts to a less than significant level have been included in the proposed General Plan and are listed as follows: OSC2-1. In addition to this policy, all subsequent projects that will undergo discretionary review will be subject to CEQA rules and regulations, which requires mitigation for project that may result in potential impacts to cultural resources.	None
AGRICULTURAL RESOURCES (AG)			
AG Impact 4 Implementation of the proposed General Plan will result in the development of potentially incompatible urban uses adjacent to agricultural lands, increasing potential conflicts and reducing viability.	Long-term	New policies in the proposed General Plan would reduce potential impacts resulting from the introduction of incompatible uses. These policies are listed below: LU7-1.	None
LAND USE, POPULATION, AND HOUSING (LUPH)			
LUPH Impact 1 Premature construction of housing could lead to accelerated and substantial population growth, with possible impacts to town character, cohesiveness, and public services.	Long-term	A number of policies and their implementation measures have been included in the proposed General Plan to mitigate the impacts associated with the expected growth of the next twenty years, including the following: LU 1-1 and LU 1-5.	None
LUPH Impact 2 Commercial growth could be outpaced by residential development, resulting in more residents commuting long distances, leading to subsequent impacts to air quality and traffic.	Long-term	Policies and implementation measures that reduce impacts to a less than significant level have been included in the proposed General Plan and are listed as follows: LU 1-2, LU 1-3, and LU1-5.	None

TABLE II-2 – Significant but Mitigable Impacts
Significant Environmental Impacts That Can be Feasibly Mitigated or Avoided
(Decision-maker must issue "Findings" under CEQA *Guidelines* §15091(a) if the project is approved)

Description of Impact	Short/ Long-term	Mitigation Measure Summary	Residual Impact
PUBLIC SERVICES (PS)			
PS Impact 1 Implementation of the proposed General Plan will require an increase in personnel, facilities, and resident education in order to continue to provide adequate fire protection.	Long-term	The following policies and their associated implementation measures are included in the proposed General Plan, and would reduce the potentially significant impacts to less than significant levels. These measures require the City to implement a Fire Department Master Plan, require new developments to pay for their fire protection needs; maintain the existing mutual and instant aid agreements with other agencies; and adopt standards of coverage specific to the geography of Coalinga; among other things. PFS1-1 and S2-5.	None
PS Impact 2 Implementation of the proposed General Plan will expand the area of coverage for the Coalinga Police Department, potentially increasing response times, potentially decreasing the Resident to Officer ratio, and increasing the need for citizen involvement and education.	Long-term	The following policies and their associated implementation measure have been included in the proposed General Plan, and should reduce the impacts of expected growth to less than significant levels. PFS2-1 and PFS2-2.	None
PS Impact 3 Implementation of the proposed General Plan will increase the demand for educational facilities.	Long-term	The growth associated with both existing and proposed projects will increase the number of students within the District. In order to provide a high quality education for all students, ensure adequate funding for construction and operation of new and existing facilities, and provide for appropriate land and siting, the proposed General Plan includes the following policies. PFS3-1, PFS4-1, and PFS5-1.	None
PS Impact 4 Implementation of the proposed General Plan will increase the demand on existing parks and for new facilities.	Long-term	In order to mitigate for the impacts to the existing recreational facilities, a number of policies have been included in the proposed General Plan. The adoption and implementation of these policies should reduce the impacts of the expected growth on the recreational facilities of the area. PFS6-1, PFS6-2, PFS6-3, and PFS6-4.	None

TABLE II-2 – Significant but Mitigable Impacts
Significant Environmental Impacts That Can be Feasibly Mitigated or Avoided
(Decision-maker must issue "Findings" under CEQA *Guidelines* §15091(a) if the project is approved)

Description of Impact	Short/ Long-term	Mitigation Measure Summary	Residual Impact
PS Impact 5 Implementation of the proposed General Plan will increase the amount of solid waste generated by the City.	Long-term	Policy PFS9-1 and the two associated implementation measures in the proposed General Plan addresses solid waste management for the City.	None
PS Impact 6 The lack of adequate facilities and pick up services for HHW could result in an increased amount of common hazardous materials entering the landfill.	Long-term	Policy S2-4 and its associated implementation measures in the Safety Element are dedicated to reducing the exposure of residents and the environment to hazardous materials.	None
PUBLIC UTILITIES (PU)			
PU Impact 2 Demand for wastewater service resulting from the implementation of the proposed General Plan will exceed the City's wastewater treatment capability, requiring construction of new wastewater utility infrastructure.	Long-term	The proposed General Plan recognizes potential deficiencies in the wastewater infrastructure associated with anticipated development. Policies and implementation measures that reduce impacts to a less than significant level have been included in the proposed General Plan and are listed as follows: PFS8-1 and PFS8-2.	None
TRANSPORTATION AND CIRCULATION (TC)			
TC Impact 3 Implementation of the proposed General Plan may result in inadequate emergency access, parking capacity, and/or may conflict with programs supporting alternative transportation.	Long-term	Policies and implementation measures that reduce impacts to a less than significant level have been included in the proposed General Plan and are listed as follows: C1-1, C2-1, and C3-1.	None
NOISE (N)			
N Impact 1 Implementation of the proposed General Plan would result in exposure of sensitive receptors to outdoor noise levels greater than 60 dBA Leq associated with vehicle traffic.	Long-term	Policies and implementation measures that reduce impacts to a less than significant level have been included in the proposed General Plan and are listed as follows: N1-1 and N1-2.	None
N Impact 2 Implementation of the proposed General Plan would potentially result in the construction of noise-sensitive land uses near existing or planned stationary noise sources.	Long-term	The proposed City Noise Element includes a process for new noise-sensitive developments to follow to achieve acceptable noise levels. Implementation of Policies N1-1 and N1-2 above will reduce potential noise impacts to less than significant levels.	None

TABLE II-2 – Significant but Mitigable Impacts
Significant Environmental Impacts That Can be Feasibly Mitigated or Avoided
(Decision-maker must issue "Findings" under CEQA *Guidelines* §15091(a) if the project is approved)

Description of Impact	Short/ Long-term	Mitigation Measure Summary	Residual Impact
N Impact 3 Construction of individual projects could temporarily produce noise levels ranging from 70 to 95 dBA at 50 feet from the source, potentially affecting adjacent sensitive land uses.	Short-term	Implementation of Policies N1-1 and N1-2 above will reduce potential noise impacts resulting from construction activities.	None
AIR QUALITY (AQ)			
AQ Impact 1 Construction activities resulting from implementation of the proposed General Plan would potentially result in an exceedance of SJVAPCD air quality standards for ROG, NOx, and PM10.	Short-term	The Air Quality Element of the General Plan describes the non-attainment status for certain pollutant of the San Joaquin Valley, and the potential affects that poor air quality may have on the residents of Coalinga and the surrounding valley. It notes that particulate matter resulting from construction and agricultural operations may irritate eyes and the respiratory tract, produce haze, and limit visibility. In response, the General Plan includes the following policies: AQ1-1 and AQ4-1.	None
AQ Impact 3 Implementation of the proposed General Plan could result in localized violations of the CO standards.	Short-term	The proposed General Plan increases the possibility that CO hotpots will occur because it increase the likelihood that the LOS on some roads will fall to LOS E or F. Buildout under the existing General Plan is not expected to result in the LOS falling below a D on local roads. (Refer to Circulation Section). Coordinating with the SJVAPCD to identify when and where Hot Spots may occur is required by the following policy in the proposed General Plan: AQ1-1.	None
AQ Impact 4 Implementation of the proposed General Plan could result in placement of sensitive land uses near sources of objectionable odors.	Long-term	The General Plan includes policies to reduce odor nuisances on a project-by-project basis by coordinating with the SJVUAPCD, and by recognizing that buffers may be necessary in cases where sensitive receptors may be exposed to objectionable odors such as at the urban/agriculture interface. Policies that mitigate potential air quality impacts resulting from the generation of odors included in the proposed General Plan include: AQ1-1, AQ3-1, and LU6-1.	None

TABLE II-2 – Significant but Mitigable Impacts Significant Environmental Impacts That Can be Feasibly Mitigated or Avoided (Decision-maker must issue "Findings" under CEQA *Guidelines* §15091(a) if the project is approved)			
Description of Impact	Short/ Long-term	Mitigation Measure Summary	Residual Impact
AESTHETIC RESOURCES (AE)			
AE Impact 1 Implementation of the proposed General Plan could significantly impact scenic vistas and natural resources within and adjacent to the City.	Long-term	New policies in the proposed General Plan would reduce potential significant impacts. Policies and implementation measures that reduce impacts to a less than significant level have been included in the proposed General Plan and are listed as follows: OSC 3-1, OSC 3-2, OSC 3-3, and LU1-1.	None
AE Impact 2 Implementation of the proposed General Plan could detract or degrade the visual setting and character of the City.	Long-term	The development review process in place in the City will assist in mitigating this impact. In addition, new policies and in the proposed General Plan would reduce potential impacts. One such policy includes a reference to Traditional Neighborhood Design (TND). Policies and implementation measures that reduce impacts to a less than significant level have been included in the proposed General Plan and are listed as follows: LU1-1, LU2-3, LU3-1, and LU5-2.	None
AE Impact 3 Implementation of the proposed Genera Plan could create new sources of light and glare, degrade the visual setting and character of the City, resulting in a significant impact to aesthetic resources (i.e., the night sky).	Long-term	Policy LU1-1 includes an implementation measure (LU1-1.11) that requires the City to develop guidelines for the preparation of lighting plans. Policies and implementation measures that reduce impacts to a less than significant level have been included in the proposed General Plan, including the following: LU1.1-11.	None

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III. PROJECT DESCRIPTION

A. PROJECT LOCATION

The city of Coalinga (city) is situated in Pleasant Valley at the base of the coast mountain ranges on the western side of Fresno County in California's Central Valley (refer to Figure III-1). Interstate 5 runs north to south approximately ten miles east of the city. Highways 33 and 198 create the axes for most of the city's urban development. Two major creeks, Warthan and Los Gatos, are located in the city. They converge a few miles east of the existing city limits, and flow east towards the San Joaquin Valley.

The city limits currently include approximately 4,541 acres. The city's existing Sphere of Influence (SOI) surrounds the historical core of Coalinga and consists of approximately 2,288 acres outside the city limits. The city's Area of Influence (AOI) includes an additional 11,581 acres outside of the SOI (refer to Figure III-2.)

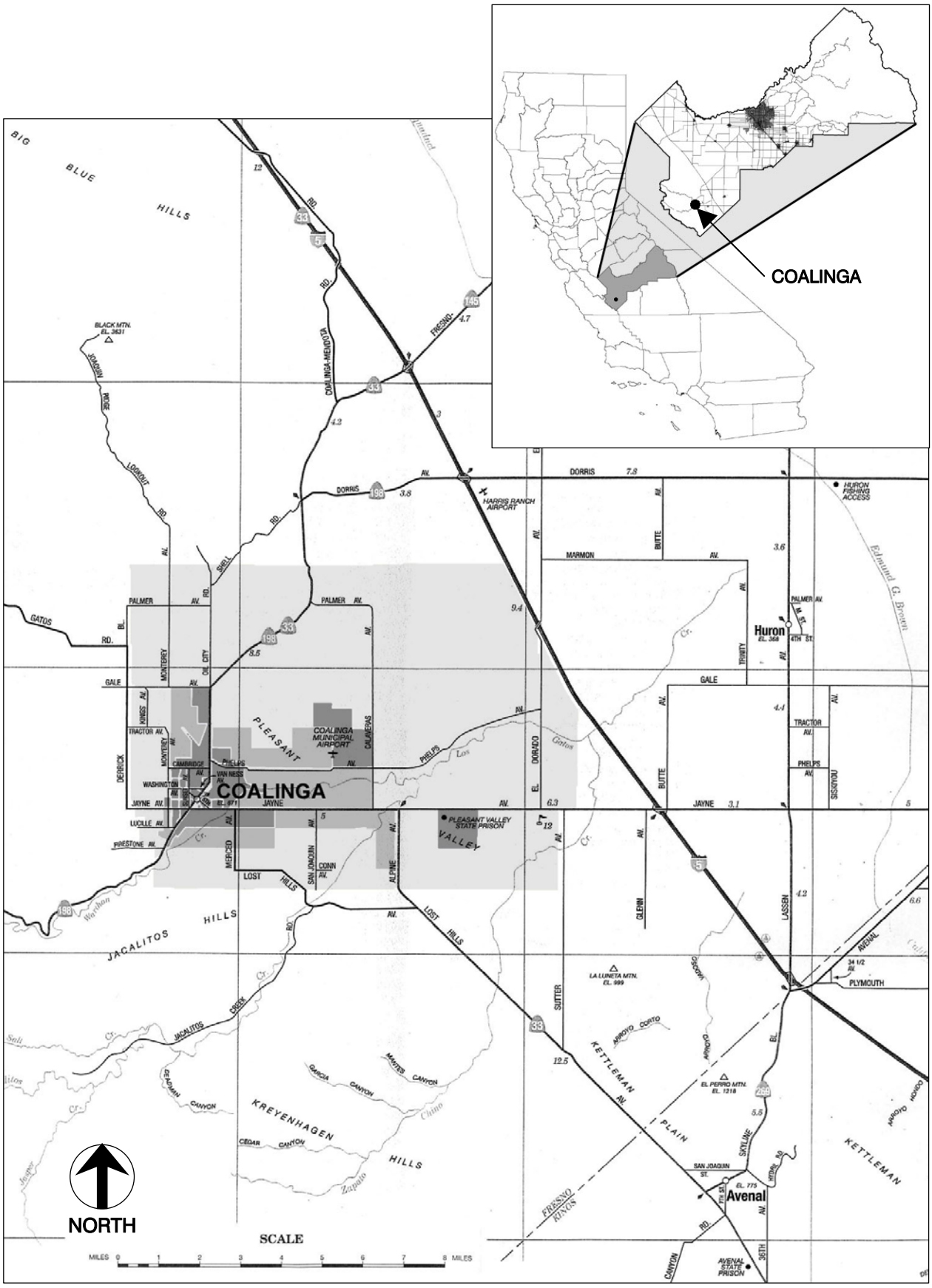
B. PROJECT OBJECTIVES

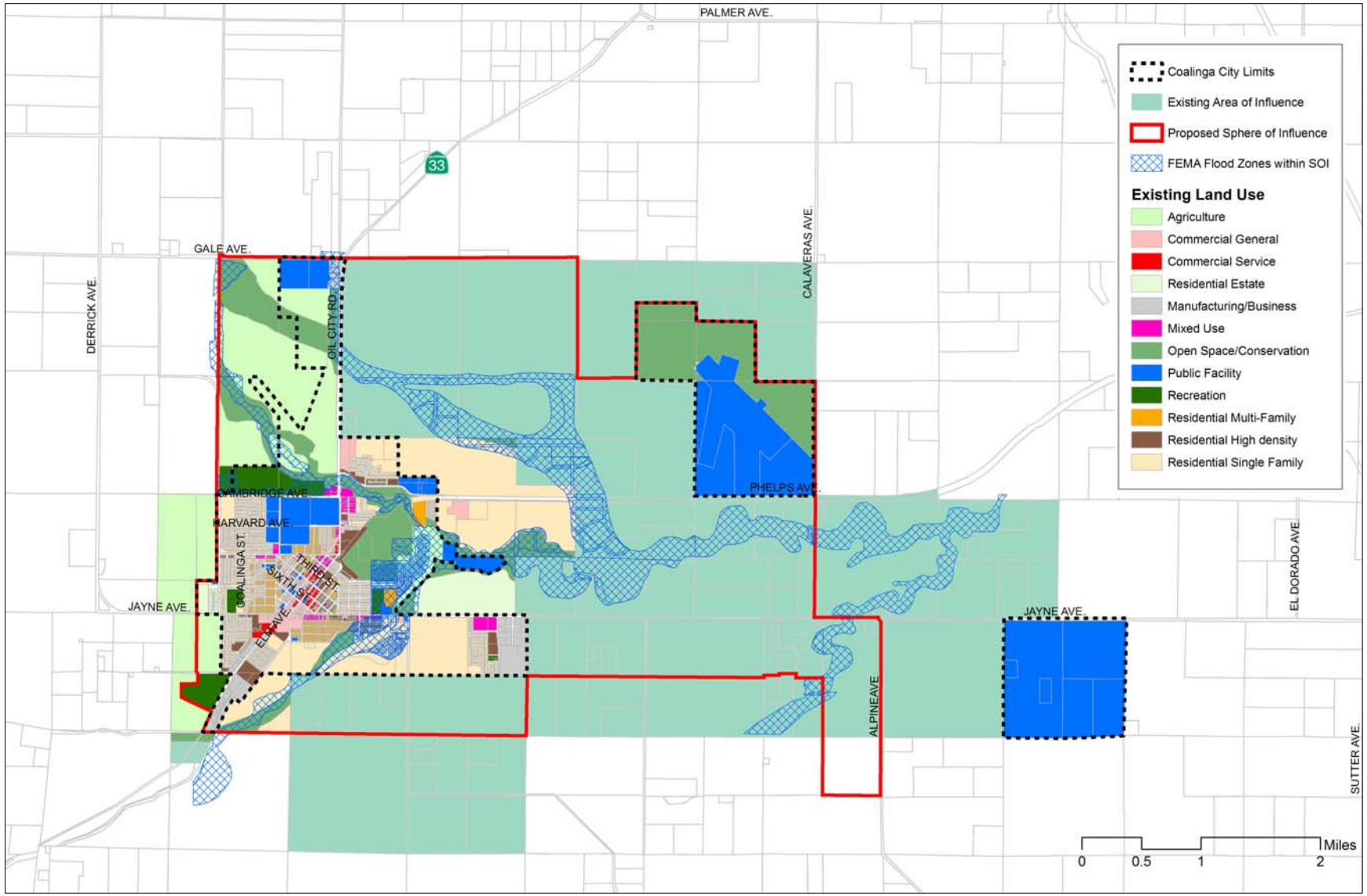
The *City of Coalinga General Plan 2015* was approved in 1994. The proposed General Plan was prompted by several factors, including State law requiring periodic general plan updates, the problematic format of the existing General Plan, and growth pressure outside the city's northern corporate limits and the existing SOI boundary. Based on the proposed General Plan the City's project objective is to plan the community for a population of approximately 55,373 by the year 2025 and to amend the City's SOI to accommodate that growth.

There have been a number of significant new developments in and around the city of Coalinga, including construction of the Pleasant Valley State Prison (1994), a new airport (1996), the Coalinga Regional Medical Center (2002), and the Coalinga State Hospital (2005). The City also recently certified a Master EIR for a new wastewater treatment plant to be located outside of the current city limits. Some of the projects above, such as the prison and wastewater treatment plant, are located outside of the existing city limits and SOI. The prison property has been "spot" annexed, meaning it was annexed by the City although none of the property boundaries touch the other city limits. The intent of this General Plan update process is to ensure that the General Plan accurately portrays the historical growth patterns and these recent developments, anticipated growth patterns and population changes, and land uses in the city of Coalinga.

C. PROJECT CHARACTERISTICS

The proposed project consists of the Draft 2025 General Plan Update, which expands the existing SOI, and the AOI. The proposed General Plan is included by reference and is a companion volume to this document. The MEIR also describes any reasonably foreseeable projects outside of the existing city limits, to the extent that information is available. It is anticipated that these projects will require additional environmental review, potentially tiering off this MEIR.


COALINGA
NORTH
SCALE
MILES 0 1 2 3 4 5 6 7 8 MILES
BIG BLUE HILLS
JACALITOS HILLS
KREYENHAGEN HILLS
LOST HILLS
PLEASANT VALLEY
KETTLEMAN PLAIN
Huron
Avenal
HARRIS RANCH AIRPORT
COALINGA MUNICIPAL AIRPORT
PLEASANT VALLEY STATE PRISON
AVENAL STATE PRISON
LA LUNETA MTN. EL. 999
EL PERRO MTN. EL. 1218
BLACK MTN. EL. 3631
DORRIS
MARMON
PALMER AV.
GALE
JAYNE
PHELPS
TRACTOR AV.
COLINGA-MENDOTA
FRESNO
DERRICK
MONTEREY
OIL CITY
CAMBRIDGE
VAN NESS
WASHINGTON
LUCILLE AV.
PRESTONE AV.
CONN AV.
ALPINE
SAN JOAQUIN
MERCED
CALAVERAS
EL DORADO
BUTTE
TRINITY
SISKIYOU
LASSEN
GLENN
SUTTER
SKYLINE
PLYMOUTH
AVENAL
JOAQUIN RIDGE
LOOKOUT
SHELL
GATOS
KINGS
TYLER
4TH ST
SAN JOAQUIN ST.
FRESNO KINGS
CANYON
ARROYO CORTO
ARROYO CENIZO
ARROYO HONDO
JACALITOS CREEK
GARCIA CANYON
MANTES CANYON
BENJAMIN CANYON
CEDAR CANYON
Edmund G. Brown
Los Gatos Cr.
Warthan Cr.
Jacalitos Cr.
Salt Cr.
Zapato Chino
Jacalitos Cr.
Cantua Cr.
Little Dry Cr.
Cr.
Cr.



Source; PMC, 2007-8

NORTH
Scale As Shown

Project Location/Existing Land Use Map
FIGURE III-2

Back of Figure III-2

1. General Plan Update

The General Plan update process included input from local residents, business owners, and other organizations. In addition, the City's Planning Commission and City Council provided direction and input throughout the update process. In 2002, a joint commission made up of Planning Commissioners and Council members, adopted principles that were intended to guide development of the Plan.

The proposed General Plan is primarily a policy document. It was prepared based on the State of California General Plan Guidelines and Title 14, Division 5.5 of the California Code of Regulations, §13506 through §13514. The proposed General Plan includes all required Elements of a General Plan except the Housing Element, which was last updated in February, 2004, through a separate process. Each Element in the proposed General Plan includes specific goals, policies and implementation measures, which are discussed in detail below.

a. Land Use Element

The Land Use Element is the foundation element that provides a basis for the future development by establishing, in general terms, the location and intensity of various land uses within the city limits. It describes the distribution of housing, business and industry, open spaces and other land uses, areas subject to flooding, and the distribution of educational and other public facilities (refer to Figure III-3). It also describes the current and proposed city boundaries, Spheres of Influence and Areas of Interest.

Table III-1 below shows the amount of acreage proposed for each land use category included in the proposed General Plan. Table V.F.-4 (refer to Section V.F., Land Use, Population, and Housing) shows maximum population based on the acreage devoted to each land use categories and the residential densities allowed within each. Using that table, the maximum population of Coalinga at buildout of the General Plan would be approximately 81,240 (refer to Table 2-9 of the General Plan Update on page 2-37 of the General Plan Update).. However, that population figure is not considered realistic given the potential for site specific environmental constraints, location of right of ways, and market factors. There are currently a large number of existing proposals with large residential components in the City. Given the existing population, these proposals, which could add approximately 38,670 residents to the population (General Plan, Table 2-4), and the environmental constraints, it seems reasonable that the population could reach approximately 55,373 by the year 2025. This population figure is the one used throughout this MEIR to identify population-associated impacts, such as water consumption, wastewater production, and greenhouse gas production. Projected population increases, based on a linear annual increase, are shown in Table III-2.

In addition to the land use designations in Table III-1, the Land Use Element establishes special planning areas for certain geographic areas around the city that may require additional consideration due to their location, and/or existing or proposed uses. Examples of these include the Gateway Overlay that applies to the geographic north and south entrances to the city, and the Flood Hazard overlay which is applied to lands within the 100-year floodplains of Los Gatos and Warthan Creeks (refer to Figure 2-6 and Table 2-6 in the proposed General Plan for these overlay areas).

b. Open Space and Conservation Elements

The Open Space Element is intended to guide the comprehensive and long-range preservation and conservation of open space land. Open space land is defined in statute as any parcel or area of land or water that is essentially unimproved and devoted to open space use. The Conservation Element provides direction regarding the conservation, development, and utilization of natural resources. Its requirements overlap those of the open space, land use, safety, and circulation elements. The Conservation Element is distinguished by being primarily oriented toward natural resources. Resources considered in these elements include agricultural rangeland, Los Gatos and Warthan Creeks, minerals and fossil fuels, scenic areas, and cultural resources.

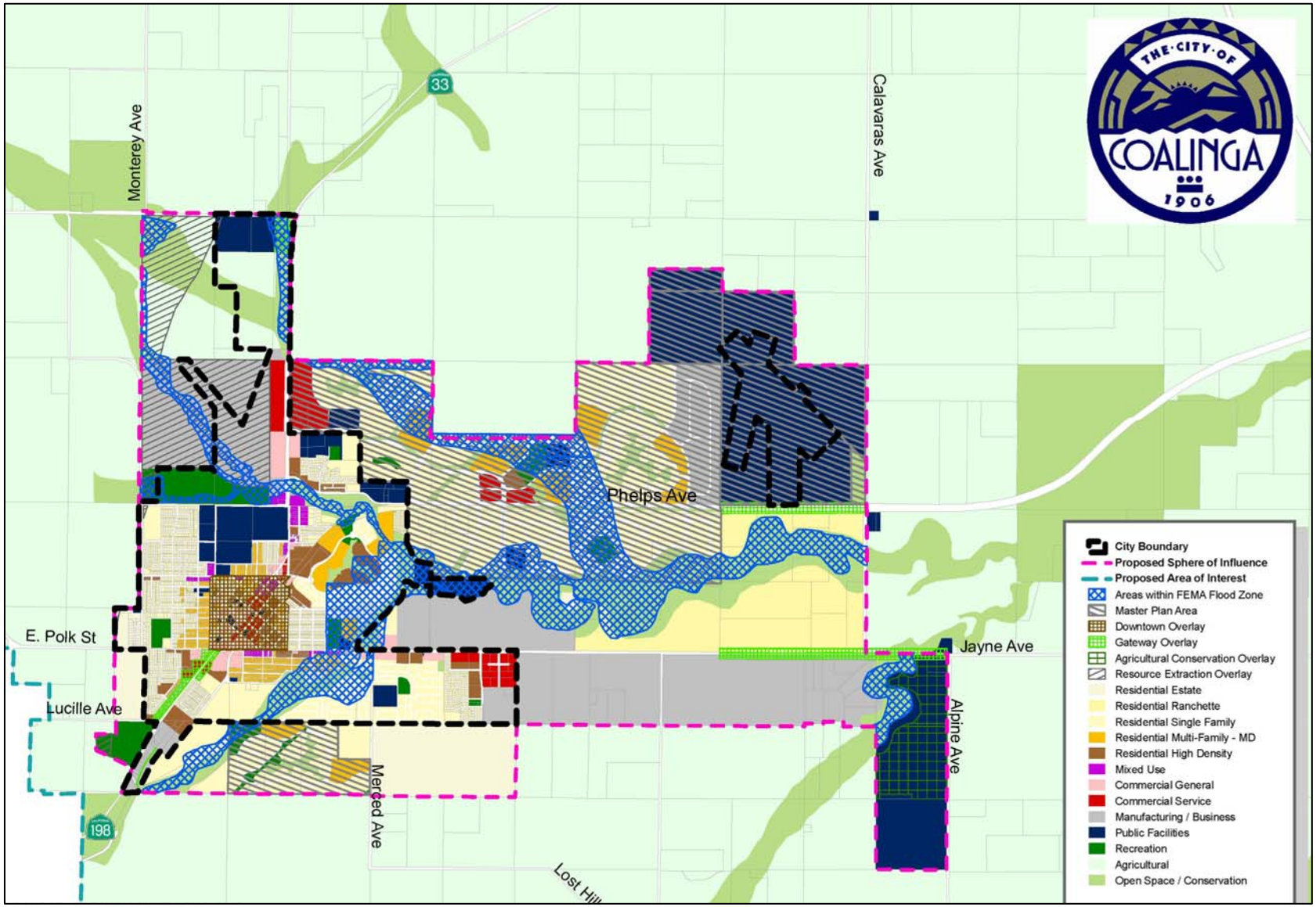
TABLE III-1
Land Use Diagram Approximate Acreages*

Land Use	City Limits	SOI	Total
Residential Ranchette	0	523	523
Residential Estate	30	464	494
Residential Single-Family	681	2,393	3,074
Residential Multi-Family – Medium Density	171	168	339
Residential High Density	168	31	199
Mixed Use	41	0	41
Commercial General	96	70	166
Commercial Service	99	89	188
Manufacturing/Business	299	1,375	1,674
Public Facilities	1,894	456	2,351
Recreation	145	660	805
Open Space/Conservation	286	958	1,244
Agriculture	95	243	338
Subtotal	4,005	7,430	11,436
Streets right-of-way	536	460	997
Total	4,541	7,890	12,433

**Totals may not be consistent with General Plan Update Table 2-5 due to rounding. Refer to Figure III-3 for Land Use locations.*

TABLE III-2
Projected Population by Year

Year	Population
2005	11,217
2010	22,256
2015	33,295
2020	44,334
2025	55,373

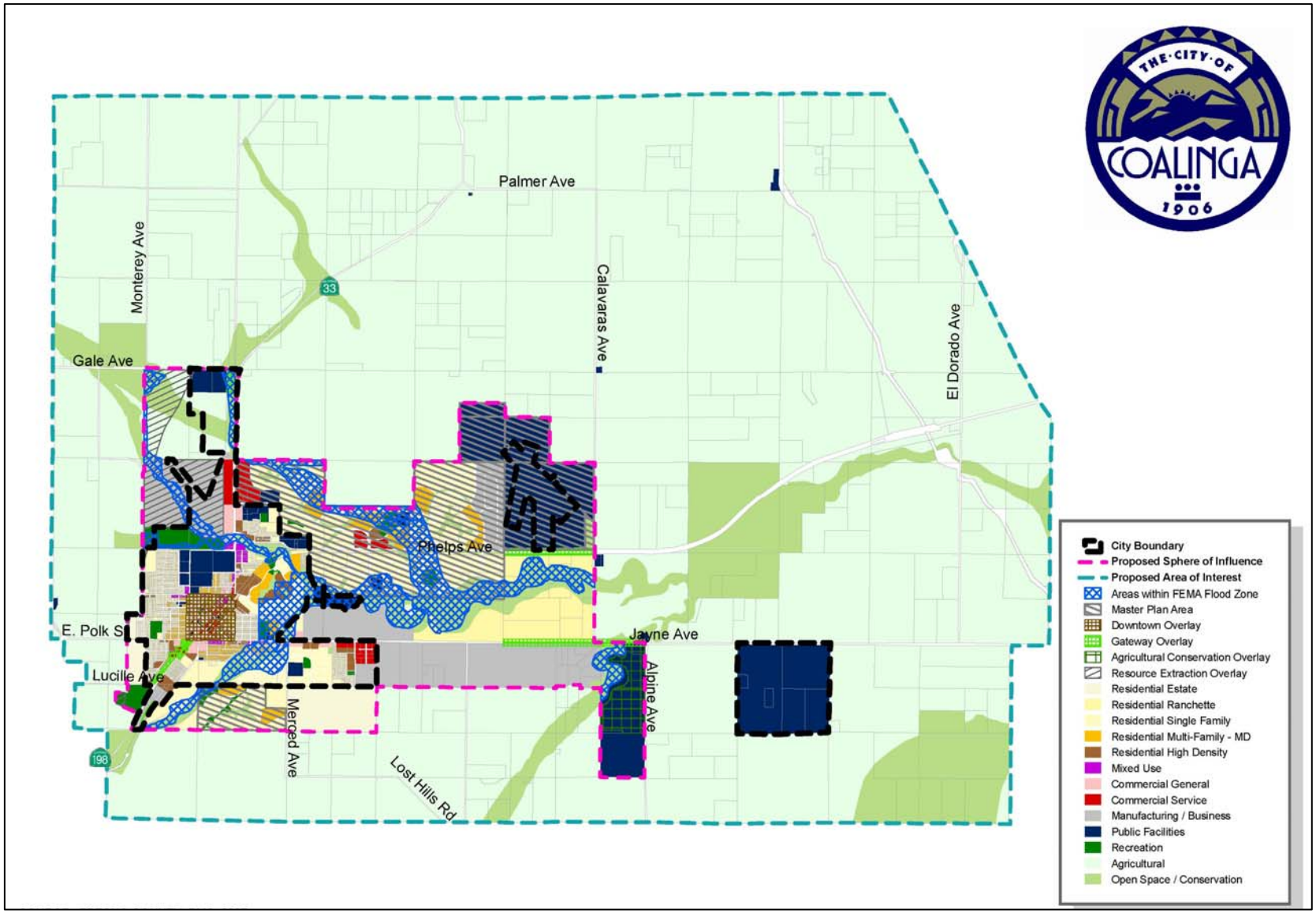


Source: PMC, 2007

NORTH
Not to Scale

Proposed Land Use with AOI
FIGURE III-3

Back of Figure III-3



Source: PMC, 2007

NORTH
Not to Scale

Proposed Land Use
FIGURE III-4

Back of Figure III-4

1) Coalinga Habitat Conservation Plan (CHCP)

The Conservation Element includes discussion of the Coalinga Habitat Conservation Plan. Lands within the existing city limits and proposed SOI provide habitat for various federally and state listed species. The plan was intended to streamline the permitting process at the local level, include provisions so that all parties involved can share costs associated with the permitting process, and to establish standards that would provide for the protection of biological resources. A draft CHCP was prepared in 2005. The plan provides useful background information regarding the species and habitat types found in the region and proposes a strategy for their conservation.

There has been minimal work performed on the draft CHCP since 2005. The City decided to complete the General Plan update prior to concluding the CHCP so that the extent of the habitat which may be required for mitigation and the appropriate locations for habitat preservation can be determined. The proposed General Plan includes policies requiring the City to coordinate with appropriate agencies to complete the CHCP process once the General Plan has been approved.

c. Circulation Element

The Circulation Element provides a long-range plan for the movement of people and goods into, out of, and within the city of Coalinga. The methods of transport include motorized vehicles, transit, bicycles and pedestrians. The element describes the existing street network and identifies improvements intended to accommodate the buildout scenarios described in the Land Use Element. Included in the element are descriptions of existing and future traffic levels by Average Daily Traffic (ADT). Figure III-4 shows the proposed network of streets within the proposed SOI intended to accommodate the ADT. Streets are classified as either "arterial," which provide circulation between major activity centers, or "collector," which channel traffic from residential and commercial areas to arterials.

d. Safety, Air Quality, and Noise Elements

The Safety Element includes policies to reduce the potential risk of death, injuries, property damage, and economic and social dislocation resulting from fires, floods, earthquakes, landslides, and other hazards. Specifically, the topics covered include seismic hazards, flooding, wildland and urban fire, manmade hazards, and disaster planning.

The Air Quality Element is not required by state law, but has been included in the City's proposed General Plan because of air quality problems in the San Joaquin Valley. This element describes air quality standards and establishes policies intended to reduce the air quality impacts of future development in the city of Coalinga. The Air Quality Element also includes policies and implementation measures that address Greenhouse Gas Emissions (GHGs) in Coalinga.

The purpose of the Noise Element is to limit the exposure of the community to excessive noise levels. This element identifies noise sources in the city of Coalinga, including major roadways, the airport, and agricultural operations. It also describes acceptable noise levels based on land use designation and includes measures that can be used to reduce the potentially harmful effects of excessive noise.

e. Public Facilities and Services Element

The Public Facilities and Services Element describes the existing public facilities and services, including police and fire department protection, schools, the airport, and the water and wastewater systems. It identifies potential deficiencies in these systems and recommends policies and implementation measures to ensure that adequate facilities and systems are in place to provide for the residents of Coalinga.

2. Sphere of Influence (SOI) Expansion

The city of Coalinga SOI is a legally defined area surrounding the city of Coalinga established by the Fresno County Local Agency Formation Commission (LAFCO). It is considered the future probable physical boundaries and service area of the city. The City will directly influence development within the SOI over the 20-year planning period by making recommendations to the Fresno County on land use policy. The City anticipates annexing the area within the SOI area as new development occurs, in consultation with the County of Fresno and Fresno County LAFCO. The proposed General Plan includes the proposed expansion of the city's current SOI, as indicated in Table III-3 and Figure III-5. The current SOI is 2,288 acres or 6,829 acres if acreage within the city limits is included. The proposed SOI for 2025 is 7,892 acres; 11,724 acres if the city limits are included.

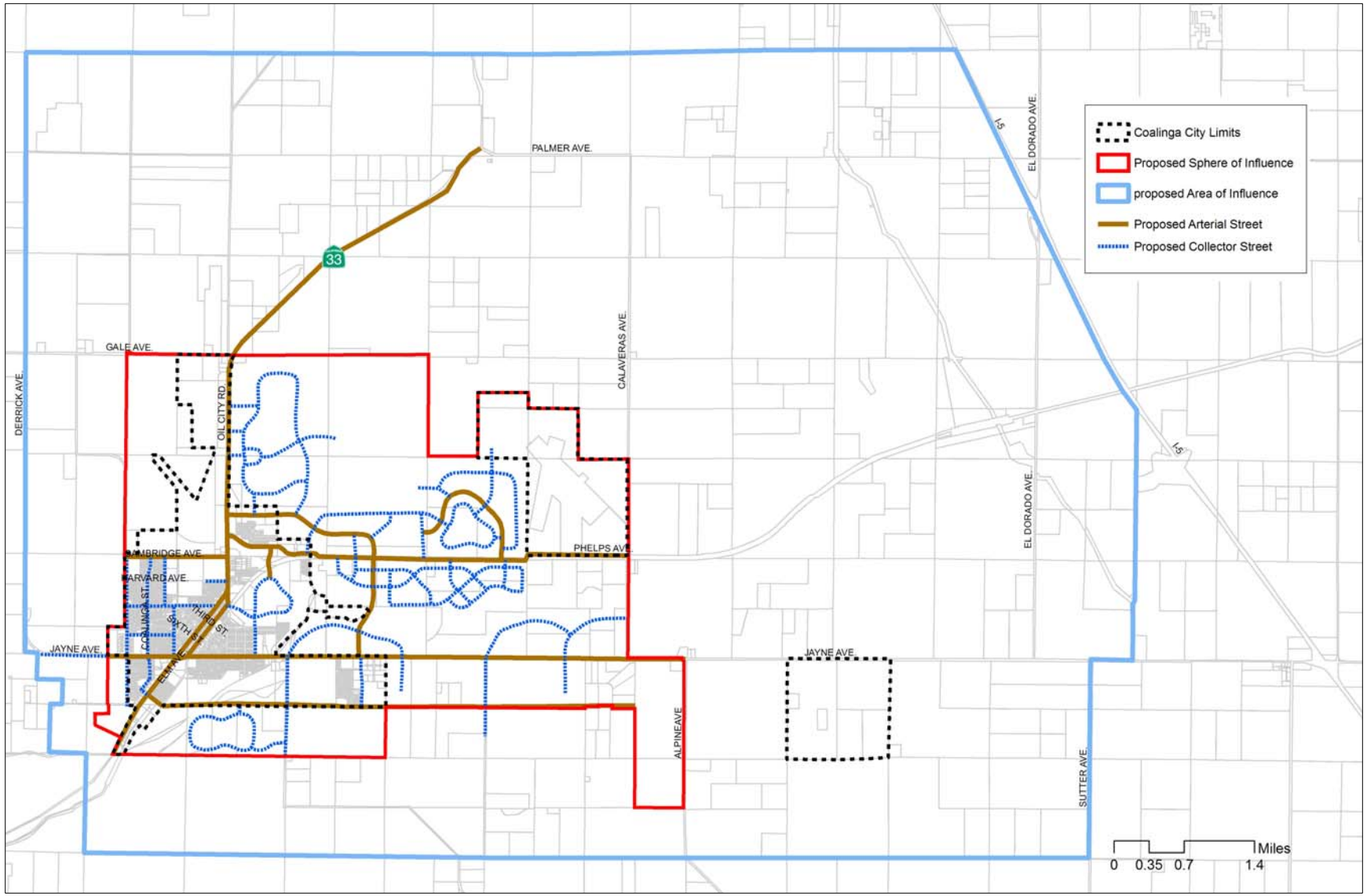
3. Area of Interest (AOI) Expansion

The AOI is an informal designation for properties of particular regional concern to the City that will ultimately be considered for inclusion into the city limits. The City does not plan to annex properties within the proposed AOI; however, this area provides linkage among the new airport, prison, Interstate 5 and the SOI. The City wishes to comment and provide direction on any projects proposed within the AOI. Fresno County has jurisdiction over the AOI. The existing AOI consists of 11,581 acres outside of the SOI. The proposed expansion of the AOI would include 41,146 acres beyond the proposed SOI (refer to Table III-3 and Figure III-5).

TABLE III-3
Planning Boundaries in Acres (approximate)

Planning Area	Current	Proposed
City Limits	3,812	3,812
Sphere of Influence	2,288	8,620
Total Planning Area	6,100	12,432
Area of Interest	11,581	41,146
TOTAL	17,681	53,579

Source: City of Coalinga General Plan Update 2025



Source: PMC, 2007 -8

NORTH
Scale As Shown

Proposed Circulation Network
FIGURE III-5

Back of Figure III-5

4. Subsequent Projects

A Master EIR is designed to eliminate, or reduce the scope of, environmental review of subsequent discretionary activities or projects whose environmental effects are addressed in the MEIR. A MEIR must provide a description of anticipated subsequent projects that would be within the scope of the MEIR and contain sufficient information with regard to the kind, size, intensity, and location of the subsequent project.

a. Private Residential and Commercial Projects

In addition to the general level of development of the proposed General Plan, this MEIR also considers the development of known specific private development proposals with residential components that have been included in the proposed General Plan either within the existing city limits or proposed Sphere of Influence. These, and anticipated commercial projects are summarized in Tables III-4 and III-5 and shown on Figure III-6. It should be noted that the subsequent projects do not have a detailed description and there is not sufficient information reasonably available to support a full assessment of potential impacts in this document. These subsequent projects would most likely require additional environmental review at the time of application for a land use permit. If the future projects are consistent with the proposed number of dwelling units as stated in the General Plan, then the environmental review would be consistent with the Guidelines, Section 15126.

TABLE III-4
Current Residential Development Proposals

Project	Acres	General Plan Land Use	Dwelling Units	Population[1]
Foreseeable Development – Within Existing City Limits				
Juniper Ridge	24	RHD	217	651
School Farms	296	RSF, RMD, RHD, MX	955	2,865
Promontory Pt. II & III	28	RSF	75	225
Dorothy Allen III	14	RSF	48	144
Posa Chanet III	13	RSF	45	135
Warthan Creek	107	RSF	351	1,053
Stallion Springs	27	RSF	95	285
Senior Living Facility[2]	7	RHD	94	188
Subtotal	*516*		*1,880*	*5,546*
Possible Future Development – Outside Existing City Limits				
Los Gatos Creek	3,310	RE, RSF, RMD, RHD, IND, CG, PF, REC	10,068	30,204
Warthan Heights	276	RSF, RMD	1,036	3,108
Subtotal	*3,586*		*11,104*	*33,312*
TOTAL	4,102		12,984	38,858

[1] *Population estimates assume 3.0 persons per household based on the January 2005 Department of Finance estimate of 3.18 persons per household*

[2] *Group quarters; population estimates assume 2.0 persons per unit.*

Source: City of Coalinga General Plan Update 2025

TABLE III-5
Current Commercial Development Proposals

Project	Acres
21st Century Mortgage Commercial Building	0.52
Truman Mini-Storage	1.43
Juniper Ridge	32
Elm Street Commercial	0.61
Regional Shopping Center	100.00
West Hills Community College District Farm of the Future	160.00
Walgreens Center	1.10
Gravel Operations Expansion	309.35

Source: City of Coalinga, 2007.

b. Public Infrastructure Projects and other Municipal Actions

The City anticipates implementing infrastructure projects and a variety of other municipal actions, such as developing and adopting ordinances, plans, and guidelines, many of which are included as Implementation Measures in the proposed General Plan. These municipal actions are shown in Table III-6.

TABLE III-6
Subsequent Project Summary
City of Coalinga Municipal Plans and Actions

Project	Kind	Location	Intensity	Capital Outlay*
PENDING PROJECTS				
Schools Development	Public Schools	Unknown at this time but would be located in major residential development areas	8 Elementary, 2 Middle Schools and 2 High Schools	Donated school sites per development requirements; school state funds; grants and other sources
Waste Water Treatment Plant and Collection System	Waste Water Services	Intersection of Jayne Avenue and SR 33 for WWTP and needed collectors from old WWTP to new facility; Consistent with Waste Water Treatment Study	Serving the Existing city limits and Existing Sphere of Influence; Capacity for first phase is 2.36 mgd	State Funds; federal funds, grants. Expansion of lines within proposed developments would be part of developers costs
Water Treatment Plant and Distribution System	Water Services	Throughout city and at existing treatment site; consistent with Water Resources Study	Capacity of the distribution system for the first phase is 12 mgd	State Funds; federal funds, grants. Expansion of lines within proposed developments would be part of developers costs

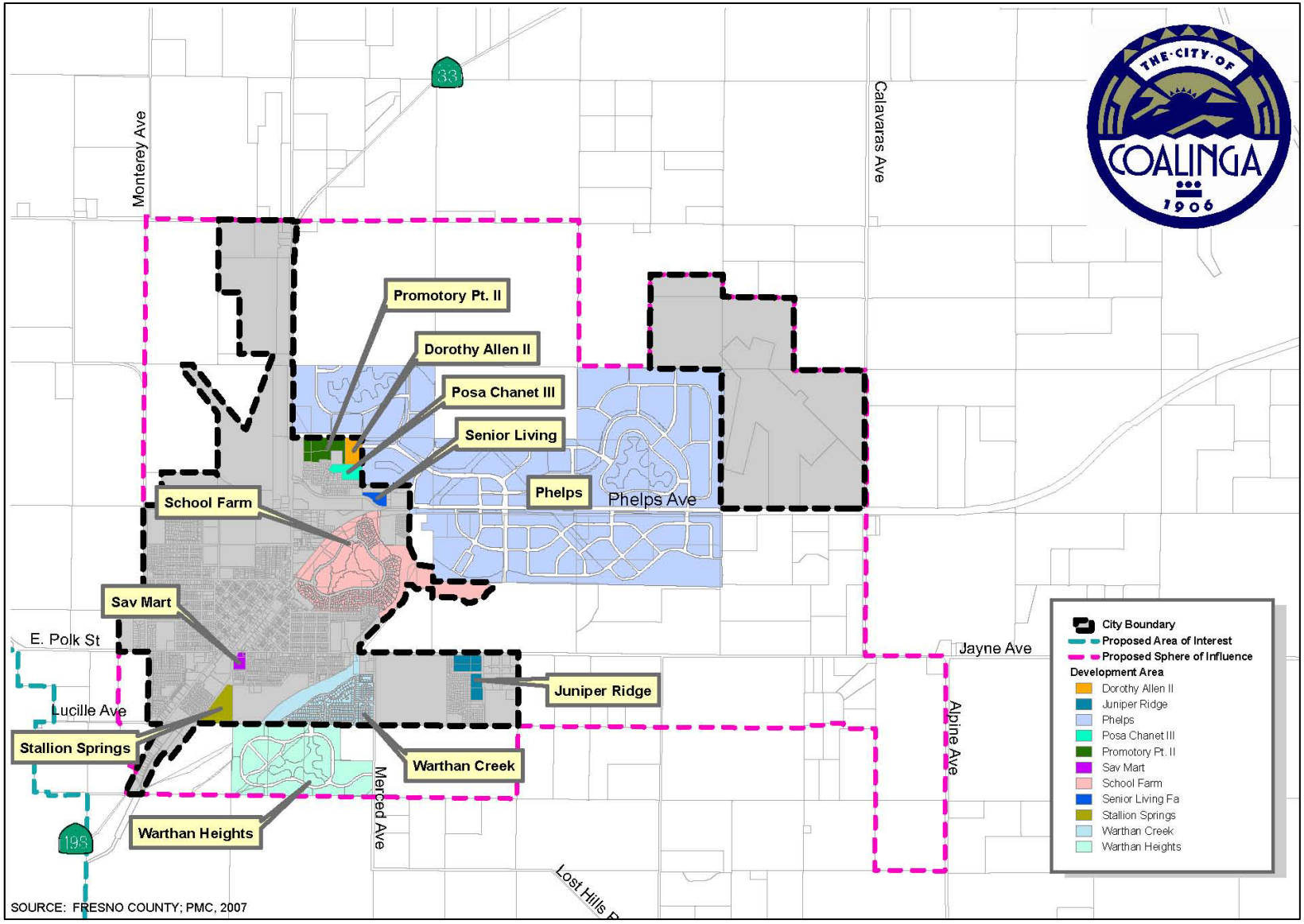
Project	Kind	Location	Intensity	Capital Outlay*
Water Reuse Facilities and Distribution System	Water Services	Consistent with Reuse Study	Capacity of the distribution system and WWTP hook up for the first phase is unknown	State funds; federal funds, grants. Expansion of lines within proposed developments would be part of developer costs.
Parks Plan, Trail Program and Related Facilities	Parks and Recreation	Consistent with Parks and trails plan.	Varies as specified in GPU totaling need for 81 acres	Grants, developers fees, general fund, etc.
Street widening and related improvements	Streets within city limits and SOI	Varies; as needed	Unknown	TIF funds
Two new bridges	New bridges within city limits and SOI	Los Gatos Creek crossing; Warthan Creek crossing	Two- lane bridges	Developers fees, FHWA and Caltrans funds, TIF fees, grants, general fund monies. Or, paid by developer if serving one development.
New collector and arterial roads	Streets	Varies; shown on Figure 4-2 in the GPU	See General Plan for street locations	TIF funds, developers fees, etc.
Creek realignments and Flood Improvements	Flood Control Improvements	Los Gatos Creek; Jacalitos Creek; Warthan Creek	Unknown	Unknown timeframe and unknown funding
PENDING DOCUMENT/PROGRAM				
Revised Zoning Ordinance	Document	City Limits; consistent with General Plan Update	Required Ordinance	Immediately after approval of the proposed General Plan; general funds
Architectural Design Guidelines, including Residential Design Guidelines, Commercial Design Guidelines, Mixed Use Design Overlay Guidelines	Document	City Limits; consistent with proposed General Plan	Policy Document	Within two years; general funds
Historic Landmark Ordinance including Inventory of Cultural Resources and Protocol for surveys and preservation of artifacts	Document	City Limits	Optional Ordinance	Within three years; inventory within next six months; grant or student project for inventory
Public Art Ordinance	Document	City Limits	Optional Ordinance	Within three years; grant
Density Bonus Ordinance	Document	City Limits; SOI	Optional Ordinance	Within one year; grant
Downtown Master Plan, including streetscape and pedestrian access plan for Downtown Core and Architectural Design Guidelines for Downtown Core; may be integrated with overall Architectural Design Guidelines	Document	City Limits	Optional Policy Document	Within one year; grant or general funds

Project	Kind	Location	Intensity	Capital Outlay*
Resource Extraction Overlay Guidelines and Regulations	Document	City Limits; SOI	Required Regulation	Within one year; general fund
Right to Farm Ordinance	Document	City Limits; SOI, URL	Optional Ordinance	Within one year; general fund
Development Standards	Document	City Limits	Required	Ongoing; general fund
Land Use Diagram Update	Diagram	City Limits	Required	Every five years; general fund
Stream and Flood Ordinance, including setbacks, development standards, use of creek open space areas(coordinate with Parks Plan and HCP)	Document	City Limits and especially the creek corridors and flood plains	Optional Ordinance	Within two years; unknown funding
Pedestrian and Bicycle Plan; coordinate with Parks Master Plan and Circulation Plan	Document/Map	City Limits; SOI	Optional Plan	Within two years; grant
Parks Master Plan and Development Standards	Document	City Limits	Optional Plan	In progress; completed immediately after Zoning Ordinance takes effect or within one year
SR 33 Access Management Plan	Document/Map	City Limits; SOI	Optional Plan	Within two years; coordinate with Caltrans; unknown funding (possibly traffic fees)
Emergency Preparedness Plan and Network, including GIS information, duplicate storage of city records, identification of critical use structures, etc.	Plan	City Limits; SOI	Required Plan	Within two years; general fund
Seismic Safety Element and Zoning Ordinance Update and incorporate into proposed General Plan	Document	City Limits; SOI	Required Plan	Within two years; general fund
Noise Element Update and incorporate into proposed General Plan	Document	City Limits: SOI	Required Plan	Within two years; general fund
Fire Department Master Plan	Document	City Limits: Service Area	Optional Plan	Within two years; general fund
Air Quality Plan, Greenhouse Gas Reduction Plan as part of AQP; Coordinated with SJVAPCD	Document	City Limits	Optional Plan	Within one year; general fund or grant
Housing Element; update and incorporate into proposed General Plan	Document	City Limits	Required Plan	Within one year; general fund
School Site Ordinance	Document	City Limits	Required Ordinance	Within one year; School District
Airport Master Plan Update	Document	City Airport	Required Ordinance	In progress and should be completed within the year; general fund

Project	Kind	Location	Intensity	Capital Outlay*
Draft Habitat Conservation Plan	Document	City Limits and Beyond	Required Plan	Commence within 6 months of GP approval.
Recycling and Composting Plan	Document	City Limits	Required Plan	Within one year; general fund

* *Capitol Outlay is defined as a capitol outlay or capital improvement program, or other scheduling or implementing device that governs the submission and approval of subsequent projects (PRC Section21157(b)(2).*

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Source: PMC, 2007

NORTH
Not to Scale

Foreseeable Projects
Phelps Subdivisions and Warthan Heights
FIGURE III-6

Back of Figure III-6

IV. ENVIRONMENTAL SETTING

The city of Coalinga encompasses 4,541 acres of Pleasant Valley within Fresno County. The coastal mountain ranges rise to the west and Interstate 5 runs north to south approximately ten miles east of the city (refer to Figure III-1). The project boundaries include the area within the city limits, the SOI, and the AOI, totaling 53,579 acres.

A. PHYSICAL SETTING AND SURROUNDING LAND USES

1. Physical Setting

The Coalinga area landscape is characterized by steep mountains and rolling foothills leveling out to the flat plains of the California Central Valley. Before the arrival of the Spanish in the 18th century, perennial grasslands and scattered oak trees dominated the within and surrounding the city. Much of this native grassland has either been converted to cropland, oil fields, or introduced annual grasses in recent times.

The Los Gatos and Warthan Creek seasonal intermittent riparian corridors run along the northeast and southeast boundaries of the city. Vegetation along these corridors varies from no obligate riparian vegetation to cottonwood stands, rushes and small marsh plants, and sparse to dense stands of small to large tamarisk. The Coalinga area historically supported large herds of pronghorn antelope and tule elk. Mule deer, San Joaquin kit fox, kangaroo rat, wild boars, coyotes, bobcat, badgers, California ground squirrels, black-tailed jackrabbits, and desert cottontails inhabit the surrounding hills and creek corridors. Turtles, small fish, frogs, and aquatic insects can be found in wet stream reaches in the canyons above the city.

2. Land Uses

A majority of the parcels within city limits are developed and currently support residential, commercial, industrial, and agricultural development, as shown on Figure III-3 (proposed Land Use Map) in the proposed General Plan. Disked soil, row crops, orchards, annual grasses, and grazing land dominate the land within the proposed SOI. Industrial uses include a gravel quarry located north and west of the City, and oil fields to the west. The airport, state prison, and mental hospital are located within the City limits although they are “spot zoned” and therefore not contiguous to the rest of the City. Land uses within the proposed AOI include grazed annual grassland, scrub and saltbush, disked soil, row crops, hay/alfalfa crops, vineyards, orchards, and oil fields.

B. CONSISTENCY WITH REGIONAL PLANS AND POLICIES

The City of Coalinga is one of fifteen incorporated cities in Fresno County. Each jurisdiction carries a responsibility to coordinate its General Plan with regional planning efforts. The following paragraphs briefly discuss specific regional plans that may affect the City of Coalinga, and the consistency of the proposed General Plan with these regional plans.

Air Quality

San Joaquin Valley Air Quality Attainment Plan (1991): The San Joaquin Valley Air Quality Attainment Plan (AQAP) establishes policies and programs for the attainment of federal and state air quality standards. The Plan contains measures to reduce emissions of reactive organic compounds and nitrogen oxides, the two precursors to ozone. In addition to control measures, the Plan includes information about air quality trends and about emission forecasts. Many policies and programs from the AQAP have been incorporated into the Air Quality section of the proposed General Plan. Additionally, AB 32, the Greenhouse Gas Emission Act, is being incorporated into the Plan, even though guidelines are not yet established by the State or SJVAPCD.

Transportation Control

Transportation Control Measures: As an outgrowth of the 1991 Fresno County Air Quality Attainment Plan, the City of Coalinga is obligated to implement various transportation control measures which serve both to alleviate traffic congestion and reduce photochemical smog. A number of these measures, such as jobs/housing balance recommendations, influence policy direction for the distribution of land uses within the City and have been included in the proposed General Plan.

Congestion Management

Fresno County Congestion Management Plan: State law requires that Fresno County create a Congestion Management Program (CMP) prior to the County receiving gas tax monies, made available through Proposition 111. The CMP represents an effort to manage traffic congestion by coordinating the many transportation, land use, and air quality programs in Fresno County. As part of this program, the City of Coalinga is required to adopt their own land use impact program and to establish policies to maintain LOS standards that are outlined in the Circulation Element of the proposed General Plan.

Seismic hazards

Seismic Hazards Mapping Act: The Seismic Hazards Mapping Act of 1990 calls for the delineation of seismic hazard zones; i.e. areas of high potential for liquefaction, earthquake induced landslides, and other ground failures. Hazard zone maps are included in the Safety Element of the proposed General Plan.

Emergency Management

The principal role of the State is to identify seismic hazard study zones. Based on State prepared maps, the local government is charged with adopting policies to reduce the extent of earthquake damage. These policies are included in the Public Safety section of the proposed General Plan to support the Seismic Hazards Mapping Act.

City of Coalinga Emergency Management Plan: The Emergency Management Plan provides the basis for disaster response planning in Coalinga. (See the Safety Element for additional information). The proposed General Plan addresses the City's planned response to

extraordinary emergency situations associated with natural disasters, technological incidents, and nuclear defense operations.

Hazardous Waste

Fresno County Hazardous Waste Management Plan: The Hazardous Waste Management Plan is designed to ensure that safe, effective, and economical facilities for the management of hazardous wastes are available when they are needed. To attain this goal, the Plan establishes goals, policies, and programs to encourage the safe handling, storage, and transportation of hazardous materials. The Public Safety section of the proposed General Plan addresses the hazardous materials issue and incorporates policies from the County's Hazardous Waste Management Plan to manage hazardous materials.

Parks & Recreation

Coalinga-Huron Parks and Recreation District Master Plan: The Parks and Recreation District Master Plan forms a framework for the future provision and operation of active and passive parks, pedestrian and bicycle paths, recreation and leisure programs, and community service facilities which physically relate to parks provisions. This Plan includes two parts: an inventory of existing recreation facilities in Coalinga and a plan that specifies improvements for the future operation of each facility. In addition, the Plan includes a summary of proposed expenditures and available funding sources. This Plan served as the basis for the development of the parks and recreation portions of the Land Use and Open Space and Conservation Elements of the proposed General Plan.

Redevelopment

Community Redevelopment Law and Coalinga Redevelopment Plan: California, through the Community Redevelopment Law (Health and Safety Code §33000 et. seq.) authorizes a city to undertake redevelopment projects to revitalize blighted areas. An adopted plan provides additional tools to a city to effectuate productive change. These include the use of tax increment (i.e., amount of additional tax revenue above a "frozen" base generated by increased property valuations resulting from new development on the project). They also include property acquisition, consolidation of small parcels, joint public-private partnerships, clearance of land and resale to developers, and relocation of tenants. A minimum of twenty percent of the tax increment, in most cases, is used for the development of low and moderate income housing.

The Coalinga Redevelopment Plan has proved, and continues to be, a valuable redevelopment tool. This plan was initially developed and used to help the city rebuild after the 1983 earthquake. The Redevelopment project area is discussed in the Land Use Element of the proposed General Plan.

Regional Plans

Fresno County General Plan: The Fresno County General Plan is a comprehensive, long-term framework for the protection of the county's agricultural, natural, and cultural resources and for development in the county. Designed to meet State general plan requirements, it outlines policies, standards, and programs and sets out plan proposals to guide day-to-day decisions concerning Fresno County's future.

Annexation & Tax Sharing Agreement

City/County Tax Sharing Agreement: In 2008, the City of Coalinga, County of Fresno, and the Coalinga Redevelopment Agency executed a Memorandum of Understanding (MOU) to jointly share tax revenues resulting from development annexed into the City after the date of the MOU. The agreement applies to areas identified within the City's SOI adopted at the time of execution of the MOU.

V. ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

This section evaluates the potential environmental impacts associated with the proposed General Plan and subsequent projects and discusses how these impacts can be mitigated or avoided. The sections are divided based on potential impacts including:

- Geology
- Drainage, Erosion, and Sedimentation
- Cultural Resources
- Biological Resources
- Agricultural Resources
- Land Use, Population, and Housing
- Public Services
- Public Utilities
- Transportation and Circulation
- Noise
- Air Quality
- Aesthetic Resources

The Environmental Impacts and Mitigation Measures chapter of this MEIR has been divided into sub sections, as follows:

- **Existing Conditions:** The description of the physical environmental conditions in the vicinity of the project, as they exist at the time the NOP is published (baseline physical conditions).

- **Regulatory Setting:** The regulations in force at the time the NOP is published (October, 2006). These are the applicable regulations governing each environmental topic, such as the Clean Air Act and its requirements for maintaining air quality. This is not an exhaustive analysis of the regulations, but rather information to assist the reader in understanding the potential impacts of the project from a regulatory perspective.

- **Thresholds of Significance:** The thresholds used to evaluate each environmental topic, and usually are based on Appendix G of the CEQA *Guidelines* or are standard procedures related to existing regulations or are standards in the industry.

- **Impact Assessment and Methodology:** Methodology used to determine the impacts associated with the project, such as measurements or field investigative processes.

- **Project-Specific Impacts and Mitigation Measures:** These include the significant environmental effects of the proposed project, as further defined below. The impacts are identified and then are followed by the mitigation measures that can minimize significant impacts; mitigation measures must be enforceable and feasible. During the preparation of the MEIR the proposed Land Use Category Map and each proposed General Plan policy was reviewed to determine the potential for significant impacts. Once the review was complete, the recommended mitigation measures were then incorporated into the proposed General Plan either as policies or associated implementation measures to reduce significant environmental impacts. The mitigation measures cited in the various sections include the corresponding general plan policy; the reader is then referred to the applicable implementation measures included in the attached General Plan.

- **Residual Impacts:** The statement of the level of impact, significant or insignificant, that is residual once mitigation is applied.

- **Cumulative Impacts:** The cumulative effects of the project when the project's effect is cumulatively considerable; in this case, all phases of the proposed General Plan could result in cumulative impacts.

- **Secondary Impacts:** If a mitigation measures would cause one or more significant effects in addition to those that would be caused by the project as proposed, the effects of the mitigation measure shall be discussed but in less detail than the significant effects of the project as proposed. (*Stevens v. City of Glendale* (1981) 125 Cal.App.3d 986).

- **Mitigation Monitoring Summary:** Mitigation measures must be enforceable; this section describes the methods for enforcing the mitigation measures, either through monitoring for compliance, permit conditions, agreements, or other legally binding instruments.

All residual impacts in the MEIR have been classified according to the following criteria (note: CEQA does not recognize a beneficial effect as an impact):

- **Significant and Unavoidable Impact**
  A significant and unavoidable impact is a significant adverse effect on the physical environment that cannot be reduced to less than significant even if reasonable mitigation measures are incorporated into the project. The EIR describes why the residual impact is still considered significant and unavoidable.

- **Significant but Mitigable Impact**
  A significant adverse impact that can be minimized when feasible mitigation measures are applied which could minimize the significance of the adverse impact. the residual impact is considered less than significant.

- **Less than Significant Impact**
  A less than significant impact is an effect that is determined not to have a substantial adverse impact on the physical environment, or when significant but mitigable, the residual impact after mitigation is less than significant.

The term "significance" is used throughout the MEIR to characterize the magnitude of the projected impact. For the purpose of this MEIR, a significant impact is a substantial or potentially substantial change to resources in the local proposed project area or the area adjacent to the proposed project. In the discussions of each issue area, thresholds are identified that are used to distinguish between significant and insignificant impacts. To the extent feasible, distinctions are also made between local and regional significance and short- versus long-term duration.

A. GEOLOGY

This section of the MEIR addresses potential geologic impacts resulting from implementation of the proposed General Plan. Design level engineering, geology, and geotechnical investigations are not a part of this MEIR process and would be undertaken at a later date as individual projects and development proceeds.

1. Environmental Setting

a. General Geologic Conditions

The city of Coalinga is located within the central portion of Pleasant Valley near the border between the Coast Ranges and Great Valley geomorphic provinces in central California. Pleasant Valley is a northwest to southeast trending alluvial basin, which is bound on the west by the central Coast Ranges (Diablo Range) and on the east by the Sierra Nevada Mountains. Both of these mountain ranges were initially formed by uplifts that occurred during the Jurassic and Cretaceous periods of geologic time, greater than 65 million years ago. Renewed uplift began in the Sierra Nevada during late Tertiary time, and is continuing today. This ridge uplifting has created Pleasant Valley into an asymmetric structural trough that has been filled with as much as six vertical miles of sediment.

The outer ridges of the valley represent a series of hills associated with anticlinal folding. An anticline is an arch of stratified rock in which the layers bend downward in opposite directions from the crest, with the oldest strata at the center producing mountain peaks. These hills (Anticline Ridge, Guijarrel Hills, Kettleman Hills, and Lost Hills) separate Pleasant Valley from the San Joaquin Valley to the east. These anticlinal structures act as traps for petroleum.

The western and southern margins of the San Joaquin Basin consist of folded and faulted Mesozoic basement rocks and upper Jurassic through Quaternary sedimentary rocks. Structural geology of the Coalinga area is dominated by a large synclinal structure (folded rock structure in which the sides dip or incline down toward a common line or plane) and several large anticlines that trend in a northwest to southeast direction. The alluvial basin known as Pleasant Valley is formed within this synclinal structure.

Sediments exposed in the Coalinga area include Holocene alluvial deposits, comprised of layers of sand, clay, and silt. Sedimentary rocks exposed in the hills on the west and east sides of Pleasant Valley consist of the Pleistocene (two million to 11,000 years old) Tulare Formation; Pliocene (two million to 13 million years old) Etchegion and San Joaquin Formations; and, Miocene (13 million to 25 million years old) Temblor, Monterey, Big Blue, Santa Margarita, and Reef Ridge Formations (Morro Group, 2006).

b. Faults and Seismicity

The city of Coalinga is located within a region of California that is historically and currently seismically active. Numerous mapped faults in the area could produce significant ground shaking, including the San Andreas, Pond-Poso Creek, and White Wolf faults located west and south of the city. Active faults surrounding the San Andreas Fault produced large earthquakes in the 20th century and are expected to produce similar large earthquakes in the future. The 1983

Coalinga earthquake, centered eight miles northeast of the city, measured 6.7 on the Richter scale and caused widespread damage to structures. The hills near Coalinga contain evidence of deep faulting in the Anticline Ridge area.

The 1983 Coalinga earthquake is thought to be associated with a geologic feature often referred to as the "Coast Ranges-Sierran block boundary zone" (CRSBBZ). Generally, this feature consists of a family of faults that appear to border the east side of the Coast Ranges. Many of these faults are likely to be active "blind-thrust" faults similar to the structure that produced the 1983 earthquake. Blind-thrust faults have no surface expression and have been located using subsurface geologic and geophysical methods. Two similar type earthquakes are thought to have occurred in 1892 near the Winters-Vacaville area adjacent to the Sacramento Valley. In addition, the 1985 M5.5 Avenal earthquake indicates similar-type faulting in the Kettleman Hills region southeast of Coalinga. The Coalinga Wastewater Treatment Plant EIR identified a number of significant earthquakes that have occurred within a 100-mile radius of the city of Coalinga; these are shown in the table below.

TABLE V.A.-1
Significant Seismic Events within 100 km of the proposed SOI

Date	Location	Closest Distance to Site (km)	Magnitude of Maximum Earthquake (M) *
1881	Parkfield	30-35 km southwest	5.8
1901	Parkfield	30-35 km southwest	6.4
1922	Parkfield	30-35 km southwest	6.3
1934	Parkfield	30-35 km southwest	6.0
1952	Bryson	100 km southwest	6.0
1966	Parkfield	30-35 km southwest	6.0
1983	Coalinga	1-10 km around site	6.5
1983	Coalinga	1-10 km around site	5.7
1985	North Kettleman Hills	1 km	5.9
**Moment magnitude (M)*			

The two principal seismic hazards to property in the Coalinga area are: 1) damage to structures and foundations due to strong ground shaking, and 2) surface rupture of earth materials along fault traces. To protect structures from the hazards of surface ground rupture, the California Department of Conservation, Division of Mines and Geology under the State-mandated Alquist Priolo Special Studies Zone Act of 1972 delineated special study zones along active or potentially active faults. An active fault, as defined by State law, is a fault that has been proven by direct geologic evidence to indicate movement within the last 11,000 years.

The potentially active designation includes those faults which were active within the last two million years (Quaternary Period), but have not been studied in sufficient detail to be classified as either active or inactive. The Alquist-Priolo Special Studies Zone Act zoned the area located

along the Nunez Fault for special studies. The Nunez Fault is located approximately six miles northwest of the City of Coalinga.

c. Ground-shaking and Liquefaction

Several secondary phenomenons are associated with strong seismic shaking, especially in areas characterized by a relatively shallow ground water table, and underlain by loose, cohesion-less soil deposits. These secondary seismic hazards include liquefaction, seismically induced settlement, and ground lurching.

Liquefaction is the phenomenon in which saturated granular sediments temporarily lose their shear strength during periods of strong, earthquake-induced ground shaking. The susceptibility of a site to liquefaction is a function of the depth, density, and water content of granular sediments, and the magnitude and frequency of earthquakes in the surrounding region. Saturated, unconsolidated silt, sand, and silty sand within fifty feet of the ground surface are more susceptible to liquefaction. The thickness of alluvial deposits in the San Joaquin Valley generally increases to the west. The depth of bedrock-type formation in this portion of the valley is estimated to be several thousand feet. The water table is at a depth of between 300 and 400 feet, effectively reducing the potential for liquefaction in this area.

Strong ground shaking can cause settlement by allowing sediment particles to become more tightly packed, thereby reducing pore space. Unconsolidated, poorly packed alluvial deposits and inadequately compacted artificial fills are especially susceptible to this phenomenon.

d. Minerals/Oil and Gas Extraction

Petroleum resources have been extracted in the area around Coalinga for over a hundred years. Two oil fields, the Coalinga and the Jacalitos, continue to produce and play an important role in the local and regional economy. These two oil fields are located to the west of the existing City limits. Other wells are located to the northeast of the city, beyond the new airport. The California Department of Conservation Division of Oil Gas and Geothermal Resources (DOGGR) maintains a database and maps of known oil wells and related infrastructure. However, because much of the exploration and production of oil in the area began before existing regulations, it is possible that undocumented wells exist within the city limits.

There are technically two active surface mines adjacent to the existing city limits, however they function as one large operation. Granite Construction currently operates the mines. They are bounded (approximately) on the north by Gale Avenue, on the east by Highway 198, on the west by Monterey Street, and the south by the former airport property and the city limits. The operation includes both extraction and processing of the materials into construction aggregates, concrete, and asphalt. It is expected that the reserves at this site will supply the area with construction aggregate for the next forty to sixty years (County of Fresno, 2000).

2. Regulatory Setting

a. State and Local Policies

The Alquist-Priolo Special Studies Act of 1972 (recently amended 1994) establishes criteria and policies at the state level to assist cities, counties, and state agencies in the exercise of their responsibility to prohibit the location of development and structures for human occupancy across the trace of active faults as defined by the State Mining and Geology Board. The Board has established Special Study Zones that regulate land uses. The Act requires that local jurisdictions conduct geological investigations before approving development within a Special Study Zone. No areas within the city of Coalinga, SOI boundary, or AOI boundary are within a Special Study Zone.

Sections 17922 and 17951-17958.7 of the State Government Code requires cities and counties to adopt and enforce the Uniform Building Code (UBC), including a grading section (1997 UBC Appendix Chapter 33.7) providing minimum protection against some geologic hazards. Sections of Volume 2 of the UBC specifically apply to select geologic hazards. The sections give design criteria for construction of earthquake resistant structures. Information typically required for design include soil profile, ground shaking, and proximity to significant faults. The UBC is reviewed and updated on a regular basis to incorporate latest knowledge on appropriate seismic design, with the most recent edition issued in 1997. The UBC also contains provisions for site geotechnical investigations and reports.

Existing law generally provides detailed seismic design requirements and provisions for engineering geologic/seismic and geotechnical investigations for certain critical and essential services buildings (e.g., hospitals, schools, etc., regulated under Title 24 of the California Administrative Code by appropriate State agencies). To assess short-term impacts more effectively, the City, through the development review process, can require site specific soil and geologic investigations. From this review, the identification of any site specific constraints will assist in determining the level of mitigation necessary to allow site development.

3. Thresholds of Significance

The significance of potential geologic impacts are also based on thresholds identified within Appendix G of the CEQA *Guidelines*. According to the *Guidelines*, geologic impacts would be considered significant if the proposed project would:

a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

   i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, or based on other substantial evidence of a known fault;
   ii) Strong seismic ground shaking;
   iii) Seismic-related ground failure, including liquefaction; or,
   iv) Landslides.

b. 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.

c. Be located on expansive soil, as defined in Table 18-1-B of the UBC (1994), creating substantial risks to life or property.

4. Impact Assessment and Methodology

Impact assessment methodologies included review of local and regional geologic, seismic and soil conditions as well as location and process review of the proposed project. Potential impacts were identified based upon known geologic conditions within the city of Coalinga and Fresno County.

5. Impacts Discussion and Proposed Mitigation Measures

GEO Impact 1 Seismic hazards will expose people and structures to potential, substantial adverse seismic effects, including the potential risk of loss, injury, or death involving strong seismic shaking or seismically induced ground failure.

Implementation of the proposed General Plan will result in construction of buildings in areas at risk from seismic events. Environmental impacts associated with geologic conditions can be generally divided into short-term and long-term impacts. Short-terms impacts are associated with the construction of specific projects and long-term impacts are associated with the completed projects' exposure to ongoing environmental conditions.

Additional development anticipated in the proposed General Plan will result in the exposure of additional people and structures to groundshaking in the event of an earthquake. Buildout projections in the General Plan anticipate an increase in the population to 56,373. This area experienced a powerful and damaging earthquake in 1983, and can expect future seismic activity. Any groundshaking that may occur in the region would be expected to be similar throughout the city as a whole and no unusual or unique risk is posed by additional development.

In order for liquefaction to pose serious threats to life and property, cohesionless soil conditions and a high groundwater table must both be present. Based on information in the Coalinga Wastewater Treatment Plant EIR, high groundwater conditions do not exist in the Coalinga area; therefore, liquefaction potential is not considered significant.

Mitigation Measures in Proposed General Plan
Conformance with the UBC, which is required for all new development and new policies in the proposed General Plan, would reduce potential impacts to a less than significant level. These policies have been incorporated into the proposed General Plan and are listed below:

S1-1 The City shall maintain its emergency preparedness, including evacuation procedures, to address potential manmade and natural disasters in order to guarantee the safety of, and accessibility to, all its residents. Procedures shall

be developed in coordination with local, State, and Federal emergency operations and Plans. Associated Implementation Measures include: S1-1.1 through S1-1.7.

S2-1 The City shall ensure that developments, structures, and public facilities are sited with consideration to safety. Associated Implementation Measures include: S2-1.1 through S2-1.3.

S2-2 The City shall ensure that developments, structures, and public facilities adequately address geologic and seismic hazards. Associated Implementation Measures include: S2-2.1 through S2-2.5.

Residual Impact
With implementation of these policies, impacts would be considered *less than significant.*

GEO Impact 2 Development on expansive soils can expose property improvements to adverse effects, resulting in reduced foundation, roadway, and utility line integrity.

The Coalinga Wastewater Treatment Plant EIR identified potentially expansive soils in the Coalinga area. Some may have high shrink-swell potential. These soils can expand and contract in response to changes in soil moisture conditions and the physical weight of development. The fill beneath pavement edges would be subject to seasonal moisture fluctuations, which could damage them. Soil expansion could result in problems such as cracked foundations, roadways, and utility lines.

The impacts from the expansive soils in Coalinga may be eliminated when specific development projects are proposed when engineers determine design parameters for the structures based on soil tests. Building foundation footings, utility lines, roadways, and sidewalks can be designed for expansive soils so that they accept the contraction and expansion according to standards contained in the UBC. All new structures in the city of Coalinga are required to be in compliance with the UBC.

Mitigation Measures in Proposed General Plan
Geotechnical review required by City ordinance and implementation of policy S2-2 above would reduce potential impacts associated with expansive soils to less than significant levels.

Residual Impact
With implementation of these policies, impacts would be considered *less than significant.*

GEO Impact 3 Implementation of the proposed General Plan will increase the amount of incompatible land uses (i.e., residential) located in the proximity of the existing surface mining operation, potentially adversely affecting the long-term viability of the operation.

The dust, noise, traffic, and visual impacts associated with surface mining can make the operations incompatible with most other land uses, particularly residential land uses. The proposed General Plan land use designations would locate a significant number of residences along Highway 198, east and slightly south of the existing surface mining operation. Based on aerial photos, new residents may be located as close as 400 feet from the mine entrance, and less than 2,000 feet from actively mined areas. These new residents may in the future raise concerns about truck traffic, dust and noise, making it more difficult to continue the operation. This impact is similar to those affecting agricultural operations located adjacent to residential land uses.

Mitigation Measures in the Proposed General Plan
Policies and implementation measures that reduce impacts to a less than significant level have been included in the proposed General Plan and are listed as follows:

OSC4-1 Recognize existing mineral resource areas as important economic and natural resources. Associated Implementation Measures include OSC4-1.1 and OSC4-1.2.

Other proposed polices address potential impacts from the operation that may affect new residences:

C1-2 New development projects shall be required to mitigate their impacts and to pay their fair share of countywide traffic improvements they contribute to the need for. Associated Implementation Measures include C1-2.1 and C1-2.2.

AQ3-1 Mitigate impacts from toxic air pollutant emissions and noxious odors from industrial, manufacturing, and processing facilities. Associated Implementation Measures include AQ3-1.1.

AQ4-1 Implement measures that effectively reduce particulate, dust and other emissions. Associated Implementation Measures include AQ 1-1.4, AQ1-1.9, and AQ4-1.2.

N1-2 The City shall ensure acceptable noise levels near sensitive noise receptors including schools, hospitals, convalescent homes and other noise-sensitive areas. Additional Implementation Measures include N1-2.3 and N1-2.5.

Residual Impact
With implementation of these policies, impacts would be considered *less than significant.*

6. Cumulative Impacts

Cumulative development and construction of habitable structures in areas currently vacant or agriculturally cultivated will increase the number of structures and people at risk from geologic hazards. These impacts will be mitigated to a level of insignificance by conformance with City ordinances, the UBC, subsequent environmental review, and implementation of policies in the Safety Element of the proposed General Plan.

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B. DRAINAGE, EROSION, AND SEDIMENTATION

This section of the MEIR addresses potential impacts resulting from implementation of the proposed General Plan on drainage, erosion, and sedimentation.

1. Environmental Setting

a. Soils

Soil properties are important considerations for potential erosion and sedimentation that would result from specific types of land uses. The National Resource Conservation Service (NRCS) has mapped the soil units for the entire Coalinga area. Soils within the proposed city limits and SOI are generally characterized as having some limitations to development. Limitations include expansive, collapsible, and corrosive soils. The degrees of erodibility vary throughout the Coalinga area.

b. Drainage

The city is located in Pleasant Valley, a northwest to southeast trending alluvial basin, which is at the base of the Diablo Range and at the western boundary of the San Joaquin Valley. Pleasant Valley has an arid climate, which leads to summers that are typically long and hot with mild dry winters. Annual rainfall within Pleasant Valley is approximately seven inches, occurring predominately between the months of October through April. The valley contains several ephemeral drainages and lakes that are typically dry during the summer and fill with stormwater runoff during the rainy season when storm events create saturated ground surface conditions. Winters with above average rainfall can create flows within area drainages from accumulated groundwater that may extend into the late spring and early summer months.

The city is located within the Arroyo Pasajero watershed, which encompasses a drainage area of approximately 530 square miles that extends from the Diablo Range to the west into the San Joaquin Valley to the east. Warthan, Los Gatos, Jacalitos, Coalmine Canyon, and Arroyo Pasajero Creeks are located within the SOI, flowing past the city in a northeasterly direction. Los Gatos and Warthan Creeks flow easterly out of the southern hills of the Diablo Range and converge at the eastern edge of the Coalinga city limits, which then forms the Arroyo Pasajero. Jacalitos Creek converges with Los Gatos Creek approximately five miles east outside of city limits. In the far southeast corner of the proposed AOI, Zapato Chino Creek flows through the Palvarado Gap into the San Joaquin Valley. These creeks all flow northeast within the Arroyo Pasajero watershed.

The city is situated at the confluence of Los Gatos and Warthan Creeks. In the upper reaches of the watershed, drainage channels are typically wide, shallow, and meandering. Near the city of Coalinga, Warthan and Los Gatos Creeks have been channelized and otherwise altered in order to increase capacity and reduce the risk of flooding. East of the city, the Los Gatos Creek channel has been scraped and shaped. Levees have been added to the creek banks to provide for added stability from high flows and increased water velocities. Warthan Creek is channelized within the SOI and bordered on both sides by levees. Farmers completed most of the channelization and levee work in the early 1900s. After the 1983 earthquake, tons of concrete rubble and debris were dumped along both banks of Warthan Creek for bank stabilization.

c. Flooding

The Arroyo Pasajero watershed is periodically subject to major flooding, including major events in 1958, 1969, and 1995. Intense but infrequent winter storms can result in significant volumes of stormwater runoff. Flooding conditions are produced when preceding rains have saturated the area watershed; as a result, surging flood flows usually peak within hours and may last several days. These flood events have caused extensive damage to agricultural land, infrastructure, public and private buildings and properties throughout Pleasant Valley.

Portions of the city, proposed SOI, and AOI are within Federal Emergency Management Agency (FEMA) designated 100-year floodplains. Flood Insurance Rate Maps divide flood areas in the city of Coalinga into two areas: Zone A for areas of 100-year flood, and Zone X for areas that are located outside of the 100-year floodplain. Figure V.B.-1 shows the locations of creeks and floodplains in the vicinity of Coalinga.

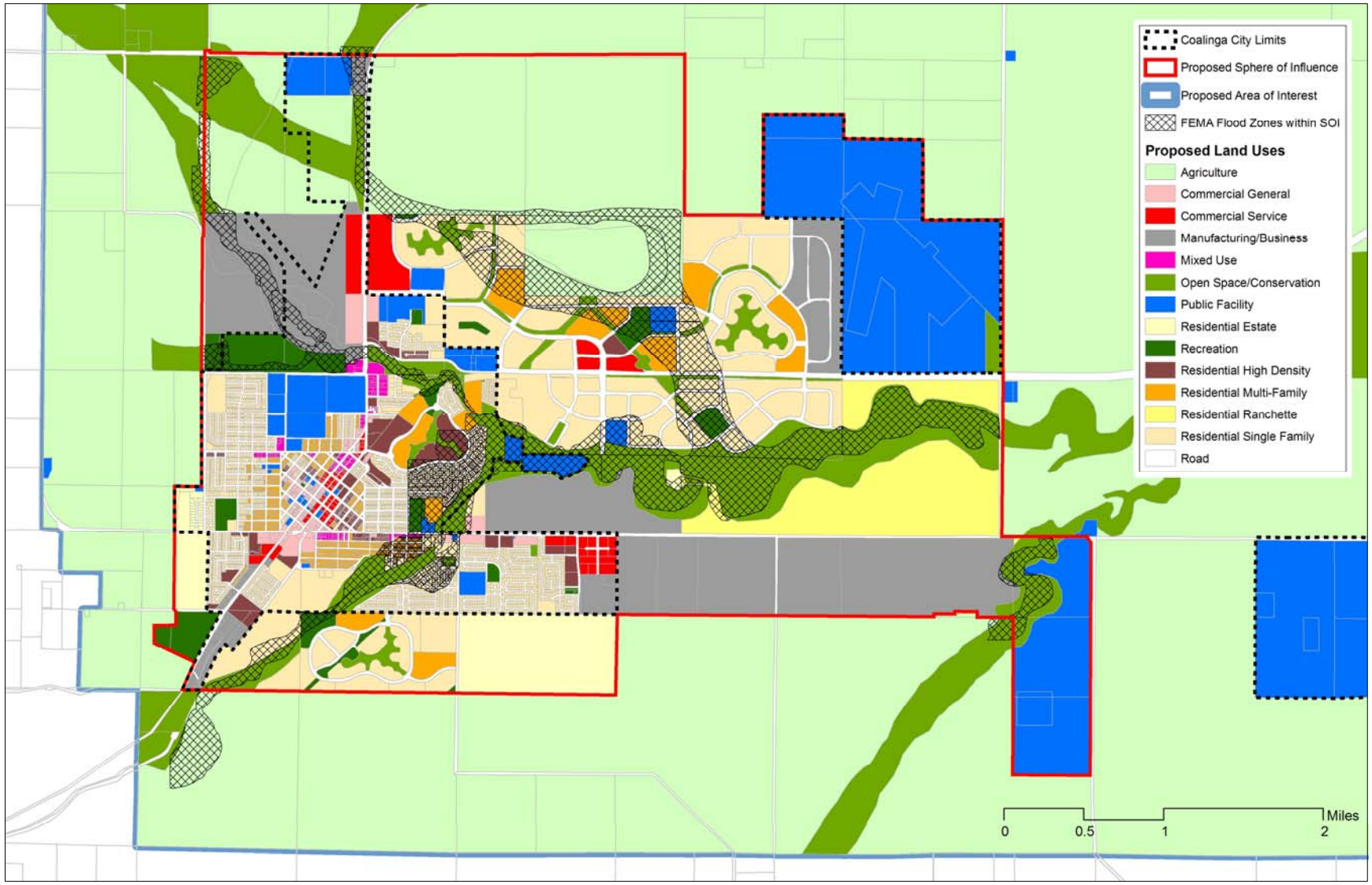
The National Flood Insurance Program 100-year floodplain is considered to be the base flood condition. This is defined as a flood event of a magnitude that would be equal to or exceeded at an average of once during a 100-year period. Floodways are defined as stream channels plus adjacent floodplains that must be kept free of encroachment as much as possible so that 100-year floods can be carried without substantial increases (no more than one foot) in flood elevations.

d. Storm Drain Master Plan

The city's Storm Drain Master Plan (Master Plan) was completed in February, 2004. The plan assesses existing storm drain/flood protection deficiencies in the city and recommends improvements that could help alleviate existing and potential future problems. The Master Plan recommends a series of capital improvements that could be made to alleviate flooding of city streets. The focus was on improving facilities in areas where few or any facilities currently exist. Other improvements include constructing a system of drainage pipes parallel to some of the existing drain pipes, increasing transfer capacity. In addition, the plan recommends improving existing detention facilities and constructing additional facilities as necessary in new growth areas, so that stormwater runoff is intercepted and detained rather than discharged directly into local creeks. The proposed location and size of detention facilities and storm drain pipes, based on potential growth patterns as expected in 2004, were outlined in the plan.

2. Regulatory Setting

Surface water and groundwater resources and their associated water quality are regulated in California through multiple laws, regulations, and ordinances administered by local, state and federal agencies. The Fresno County Flood Control District, California Department of Water Resources and Central Valley Regional Water Quality Control Board (RWQCB) are the primary local agencies responsible for the protection of watersheds, floodplains, and water quality within the city of Coalinga. These agencies ensure that the hydrologic characteristics of surface water and groundwater are considered, so that the existing identified beneficial uses are not impaired. Similarly, water quality regulations are designed to limit the discharge of pollutants to the environment, maintain surface water and groundwater quality, protect fish and wildlife and their habitats, and protect beneficial uses. This section describes regulation relevant to construction and operational activities from the WWTP project.



Source: from data provided by PMC, 2006-8

NORTH

FEMA Floodplains within the Proposed SOI
FIGURE V.B.-1

Back of Figure V.B.-1

a. Federal Policies and Regulations

Federal and State agencies have jurisdiction over specific activities conducted in or connected to drainages, stream channels, wetlands and other water bodies. The federal government supports a policy of minimizing "the destruction, loss or degradation of wetlands" (Executive Order 11990, May 24, 1977). The U.S. Army Corps of Engineers (ACOE) and the U.S. Environmental Protection Agency (EPA) regulate the placement of dredged and fill material into "Waters of the United States", including wetlands, under Section 404 of the Clean Water Act (CWA). Un-vegetated stream channels, mud flats and open water such as ponds and lakes are not considered wetlands but do fall under the ACOE and EPA jurisdiction under Section 404 of the CWA as "other waters of the United States." The jurisdictional limits of stream channels and lakes are delineated, in the absence of adjacent wetlands, at the ordinary high-water mark. For all work subject to a Section 404 permit, project proponents also must be obtained from the RWQCB via either a certification or a waiver under Section 401 of the CWA stating that the project would comply with applicable water quality regulations.

1) Section 404, Federal Clean Water Act

Section 404 of the Federal Clean Water Act authorizes the Environmental Protection Agency and the U.S. Army Corps of Engineers to regulate water quality through the restriction of pollutant discharges.

2) Section 10, Rivers and Harbors Act

Section 10 of the Rivers and Harbors Act authorizes the U.S. Army Corps of Engineers to protect commerce in navigable streams and waterways through issuance of permits for dredging, filling and construction activities.

3) Federal Emergency Management Act

The Federal Emergency Management Agency (FEMA) establishes base flood heights for 100-year and 500-year flood zones. The most recent update of the base flood heights was completed in 2005.

b. State Policies and Regulations

1) Section 1600 Fish and Game Code

In addition to the CWA regulations, the California Fish and Game Section 1600 Streambed Alteration Permit Program may be required depending on the nature of the particular activity associated with regulated waterways.

2) State Water Resources Control Board

Since 1990, regulations have increasingly emphasized the control of water pollution from non-point sources, which include stormwater systems and runoff from point-source construction sites and industrial areas. In California, the State Water Resources Control Board (SWRCB) issued a statewide General Permit to regulate runoff from construction sites involving grading and earth moving in areas over one acre. The SWRCB is acting to enforce requirements of the federal Clean Water Act, pursuant to regulations issued by the U.S. EPA for the National Pollutant

Discharge Elimination System. Although the NPDES program is established by the federal Clean Water Act, the permits are prepared and enforced by the regional water boards through program delegation to California and implementing authority in the California Water Code. This State Order (Water Quality Order 99-08-DWQ) requires construction projects covered under the General Permit to use the "best available technology economically achievable," and the "best conventional pollution control technology." Each construction project subject to the permit is required to have a Storm Water Pollution Prevention Plan (SWPPP) prepared, which identifies likely sources of sediment and pollution and incorporates measures to minimize sediment and pollution in runoff water. These objectives are established based on the designated beneficial uses (e.g., water supply, recreation, and habitat) for a particular surface water or groundwater.

3) Department of Water Resources

The State Department of Water Resources also is responsible for coordinating flood-fighting activities and is authorized to receive requests from public agencies for assistance during floods. Should flooding occur, these agencies would have policies and regulations with respect to how flooding hazards would need to be dealt with.

4) Porter-Cologne Water Quality Control Act

The Porter-Cologne Water Quality Control Act is enforced as part of the California Water Code, and authorizes local jurisdictions to establish water quality basin plans that provide water quality standards for local surface and ground water supplies.

5) Regional Water Quality Basin Plans

Local regulation authorized under the Porter-Cologne Act and enforced by the Regional Water Quality Control Board to maintain surface and ground water quality. The Regional Water Quality Control Board enforces a statewide policy mandating preparation of a Stormwater Pollution Prevention Plan (SWPPP) for construction activities that disturb greater than one acre.

c. Local Regulations

1) City of Coalinga Floodplain Management Ordinance

Areas of the city of Coalinga periodically flood, resulting in loss of life or property, health and safety hazards, disruption of commerce and governmental services, and public expenditures for flood protection and relief. They found that these problems were caused by "uses that are inadequately elevated, floodproofed, or protected from flood damage.". Obstructions in special flood hazard areas also increased flood heights and velocities, contributing to the problems. As a result, the City of Coalinga developed and adopted floodplain management regulations to minimize public and private losses due to flood conditions.

The regulations apply to all areas of the city located within mapped FEMA special flood hazard areas. They require all development proposed in these locations to obtain a development permit (a discretionary permit process) and provide specific information regarding base flood elevations at the project location, foundation design details, and a description of the extent to which any water course will be altered or relocated. Standard provisions for minimizing the affects of development that occurs within floodplains is also included.

3. Thresholds of Significance

Based on Appendix G, Section VIII of the CEQA *Guidelines*, the threshold of a significant drainage, erosion or flooding impact is that which would:

a. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner that would result in substantial erosion or siltation on-or off-site.

b. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site.

c. Create or contribute to runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.

d. Violate any water quality standards or waste discharge requirements, or otherwise substantially degrading water quality.

e. Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary of Flood Insurance Rate Map or other flood hazard delineation map.

f. Place within a 100-year flood hazard area structures that would impede or redirect flood flows.

g. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam.

h. Inundate by seiche, tsunami or mudflow.

4. Impact Assessment and Methodology

The analysis of impacts to drainage, erosion, and sedimentation is qualitative. Development patterns and types under the proposed General Plan can only be approximated. General impacts can be assumed based on the location and type of future development.

5. Impacts Discussion and Proposed Mitigation Measures

DES Impact 1 Implementation of the proposed General Plan would potentially subject people and structures to flooding.

Flooding is already a problem in some areas of the city of Coalinga. Deficiencies in the existing storm drain network have resulted in flooding, particularly in the older areas of town. Much of the area located in the proposed new SOI that is also located within FEMA flood hazard zones, has been zoned Open Space, minimizing the number of structures that could be affected by flooding (refer to Figure III-3, Land Use Diagram). However, there are some areas zoned residential, and industrial within the flood hazard zones.

Mitigation Measures in Proposed General Plan
New policies in the proposed General Plan, along with implementation of the existing Flood Hazard Management Ordinance, would reduce potential impacts to a less than significant level. These policies are listed below:

S2-1 The City shall ensure that developments, structures, and public facilities are sited with consideration to safety. Associated Implementation Measures include: S2-1.1 through S2-1.3.

S2-3 The City shall ensure that developments, structures, and public facilities adequately address flooding hazards. Associated Implementation Measures include: S2-3.1 through S2-3.4.

Residual Impact
With implementation of these policies, impacts would be considered *less than significant.*

DES Impact 2 Implementation of the proposed General Plan would result in additional construction in undeveloped areas, increasing erosion and sedimentation.

Much of the proposed planning area is fairly level, increasing the potential for water to infiltrate the soil rather than runoff, reducing the potential for major erosion. Evidence of some sheet erosion is visible on agricultural lands. The creeks and drainage gullies show evidence of erosion from major storm events.

During the construction phase of individual projects and other incidental development occurring under the proposed General Plan, grading and earthwork will be necessary to prepare sites for development. The use of heavy equipment will loosen and/or compact the soil. During heavy rains, runoff and/or sediment load increases may occur downstream. The extent of additional runoff or sediment load increases can vary significantly depending on the area of disturbance and geologic factors. This additional runoff could adversely affect localized areas.

Mitigation Measures in Proposed General Plan
A new policy in the proposed General Plan would reduce potential impacts to or from drainage, erosion, and sedimentation; this policy is listed below:

S3-1 Prevent unnecessarily intensive drainage, erosion, and sedimentation. Associated Implementation Measures include: S3-1.1 through S3-1.4.

This policy includes a number of implementation measures as well that require applicants to demonstrate that new developments will not alter drainage patterns and flow rates. In addition, applicants are required to submit erosion control plans if the project involves moving 5,000 cubic yards or more, or are located within 500 feet of the 100-year floodplain or within 100 feet of any unnamed drainage or tributary in the local watersheds.

Residual Impact
With implementation of these policies, impacts would be considered *less than significant.*

DES Impact 3 Implementation of the proposed General Plan would contribute runoff water potentially exceeding the capacity of existing or planned stormwater drainage systems.

New urban development consistent with the proposed General Plan would increase the amount of impervious surfaces in the area, potentially altering the drainage patterns and increasing runoff rates. As a result, the flood levels and runoff rates calculated by FEMA and/or city engineers in utilized by city engineers percentage of impervious surfaces in the proposed General Plan area, resulting in higher runoff volumes, potentially altering existing flood levels.

The city of Coalinga Drainage Master Plan study area and the proposed city of Coalinga SOI are different in the proposed General Plan. The Drainage Master Plan, completed in 2004, does not include those areas. As a result, new development may contribute runoff to the system that could exceed the existing and planned stormwater runoff facilities, resulting in a significant impact.

Mitigation Measures in Proposed General Plan
Policies and implementation measures that reduce impacts to a less than significant level have been included in the proposed General Plan and are listed as follows:

PFS8-1 The City shall provide adequate and efficient utility service to the residents of Coalinga. Associated Implementation Measures include: PFS8-1.1 through PFS8-1.8.

PFS8-2 The City shall permit new development only when accompanied by adequate and efficient utility infrastructure and services and only when the effectiveness of existing infrastructure and services is not reduced. Associated Implementation Measures include: PFS8-2.1 through PFS8-2.6.

S2-3 The City shall ensure that developments, structures, and public facilities adequately address flooding hazards. Associated Implementation Measures include: S2-3.1 through S2-3.4.

S3-1 Prevent unnecessarily intensive drainage, erosion, and sedimentation. Associated Implementation Measures include: S3-1.1 through S3-1.3.

Residual Impact
With implementation of these policies, impacts would be considered *less than significant*.

6. Cumulative Impacts

Development of vacant land under the Proposed General Plan and subsequent projects will impact drainage and potentially cause erosion and sedimentation in the Coalinga area. Specific environmental review and implementation of mitigation measures (if needed) for projects based on size, amount of disturbance, and proximity to creek and flood areas would assess and lessen drainage, erosion, and sedimentation impacts. Cumulative impacts associated with drainage,

erosion, and sedimentation are considered significant but mitigable to less than significant through implementation of the Implementation Measures listed in the Safety and Public Facilities Elements of the proposed General Plan.

C. CULTURAL RESOURCES

This section of the MEIR addresses potential impacts resulting from implementation of the proposed General Plan on cultural resources. Much of the background information is from the recently certified City of Coalinga Wastewater Treatment Plant Program EIR and the associated Cultural Resources Survey.

1. Environmental Setting

a. Prehistoric Setting

The city of Coalinga and surrounding areas are located within the ethnographic territory of the Southern Yokuts people. The Southern Yokuts homeland was centered near water sources including Tulare Lake, Buena Vista Lake, Kern Lake, and connecting sloughs and rivers. Population density was very low in areas removed from main water courses and lakes.

Earliest evidence of human occupation of the region consists of spear points, including fluted points found on the shores of Tulare Lake. These points potentially date back to 12,000 to 10,000 before present (BP). The earliest radiocarbon date in the region, 8,000 BP, was obtained from a buried site on the shores of Buena Vista Lake. Three archaeological components have been defined for the Coalinga area: 1) Early Horizon (8,000 to 4,500 BP); 2) Middle Horizon (4,500 to 3,000 BP); and, 3) Late Horizon (3,000 BP to 1,500 BP). The Late Horizon may represent peoples who are a precursor to the Yokuts culture.

b. Historic Setting

A Spanish mission was built at San Antonio de Padua in 1771. Other missions soon followed, with Soledad in 1791 and San Miguel in 1797. The Spanish attempted to adapt the Yokuts to the mission system, but were largely unsuccessful. Epidemics of European diseases weakened and reduced the native Yokut populations. Following the acquisition of California by the United States, American settlers gradually occupied Yokuts territory, establishing sheep and cattle ranches. Oil development in the area began as early as 1864, with efforts made to produce oil from hand-dug oil wells. Supplies and water were brought into the area by wagon until a branch line of the Southern Pacific Railroad was extended into the west side of the San Joaquin Valley in 1877. Discovery of oil shale and lignite seams in 1887-1888 led to the rail line being extended to a site named Coaling Station A. Efforts were made to develop a commercial coal mining operation, but these failed by 1898. A small town grew up around Coaling Station A, renamed Coalinga by the Southern Pacific Railroad.

A successful petroleum industry began to develop around Coalinga in the 1890s and into the early years of the 20th century. By 1914, the combined oil fields of California were producing more oil than any other fields in the world. The railroads served the sheep-raising and wool industry, and dependable transportation led to the development of cattle and wheat ranches. Irrigation fueled the growth of more intensive agricultural activities, with an associated population increase in the region and the development of small farming towns.

In 1983, a major earthquake caused severe damage to or destroyed most of the historically significant buildings in the area. Of 139 buildings located in the eight block downtown

commercial district, 59 collapsed or were heavily damaged and more than eight hundred single-family houses, most of which were un-reinforced adobe construction, were destroyed or incurred major damage.

c. Prior Cultural Resources Inventories

Previous archaeological investigations and surveys in the immediate Coalinga area have identified archaeological sites along both Los Gatos and Warthan Creeks. There is an additional site located near the junction of Los Gatos and Jacalitos Creeks approximately three miles outside of the existing city limits.

The vast majority of the proposed SOI and AOI have not been examined for archaeological resources because most land is either undeveloped or supporting agriculture. In the spring of 2005, the new WWTP site was surveyed by a qualified archaeologist. A 2,248 acre area north of Phelps Avenue was also surveyed in 2005. No cultural resources were identified during either investigation (Sierra Valley, 2005).

A literature search was performed for purposes of this MEIR (Sierra Valley, 2006). That search revealed the locations of previously performed studies in the Coalinga area and the locations of known resources. That information is kept confidential and will be kept at City offices for use in future planning and environmental review efforts.

2. Regulatory Setting

Federal, State and local governments have developed laws and regulations designed to protect significant cultural resources that may be affected by actions that they undertake or regulate. The National Environmental Policy Act (NEPA), National Historic Preservation Act (NHPA) of 1966, and CEQA are the basic federal and state laws governing preservation of historic and archaeological resources of national, regional, State and local significance.

a. Federal Regulations

Federal regulations for cultural resources are governed primarily by Section 106 of the NHPA. Section 106 of the NHPA requires Federal agencies to take into account the effects of their undertakings on historic properties and affords the Advisory Council on Historic Preservation a reasonable opportunity to comment on such undertakings. The Council's implementing regulations, “Protection of Historic Properties,” are found in 36 Code of Federal Regulations (CFR) Part 800. The goal of the Section 106 review process is to offer a measure of protection to sites which are determined eligible for listing on the National Register of Historic Places. The criteria for determining National Register eligibility are found in 36 CFR Part 60. Amendments to the NHPA (1986 and 1992) and subsequent revisions to the implementing regulations have, among other things, strengthened the provisions for Native American consultation and participation in the Section 106 review process. While federal agencies must follow federal regulations, most projects by private developers and landowners do not require this level of compliance. Federal regulations only come into play in the private sector if a project requires a federal permit or if it uses federal money.

b. State Policies and Regulations

1) California Environmental Quality Act

CEQA (Public Resources Code 21000 et seq.) requires lead agencies to consider the potential effects of a project on significant historical and archaeological resources. Significant impacts on such resources are to be avoided or mitigated to less than significant levels. Other state laws govern actions affecting cemeteries and human remains.

State historic preservation regulations affecting this project include the statutes and guidelines contained in CEQA (Public Resources Code §21083.2 and §21084.1 and §15064.5 of the CEQA *Guidelines*). CEQA requires lead agencies to carefully consider the potential effects of a project on historical resources.

An "historical resource" includes, but is not limited to, any object, building, structure, site, area, place, record or manuscript which is historically or archaeologically significant (Public Resources Code §5020.1). §15064.5 of the CEQA *Guidelines* specify criteria for evaluating the importance of cultural resources, replacing Appendix K of the CEQA *Guidelines*. Evaluation criteria include the following:

a. The resource is associated with events that have made a contribution to the broad patterns of California history;
b. The resource is associated with the lives of important persons from our past;
c. The resource embodies the distinctive characteristics of a type, period, region or method construction, or represents the work of an important individual or possesses high artistic values; or
d. The resource has yielded, or may be likely to yield, important information in prehistory or history.

Advice on procedures to identify such resources, evaluate their importance and estimate potential effects is given in several agency publications such as the series produced by the Governor's Office of Planning and Research (OPR). The technical advice series produced by OPR strongly recommends that Native American concerns and the concerns of other interested persons and corporate entities, including but not limited to, museums, historical commissions, associations and societies be solicited as part of the process of cultural resources inventory. In addition, California law protects Native American burials, skeletal remains and associated grave goods regardless of their antiquity and provides for the sensitive treatment and disposition of those remains (California Health and Safety Code §7050.5, California Public Resources Code §5097.94 et seq.).

2) California Historic Register

The State Historic Preservation Office (SHPO) maintains the California State Register of Historic Resources (CRHR). Properties that are listed on the National Register of Historic Properties (NRHP) are automatically listed on the CRHR, along with State Landmarks and Points of Interest. The CRHR can also include properties designated under local ordinances or identified through local historical resource surveys.

3) Senate Bill 18 Consultation

Senate Bill 18 (SB 18) was signed into law in September, 2004 (effective January, 2005), and requires local governments (city and county) to consult with California Native American tribes to aid in the protection of traditional tribal cultural places through local land use planning. The State Tribal Consultation Guidelines (November 2005) states that the intent of SB 18 is to provide California Native American tribes an opportunity to participate in local land use decisions at an early planning stage, for the purpose of protecting, or mitigating impacts to, cultural places. The purpose of involving tribes at these early planning stages is to allow consideration of cultural places in the context of broad local land use policy, before individual site-specific, project-level land use decisions are made by a local government.

Local governments are required to consult with tribes prior to making certain planning decisions and to provide notice to tribes at certain key points in the planning process. Applicable planning decisions include the adoption and amendment of general plans and specific plans.

In January 2007, the City initiated consultation with local tribes identified by the Native American Heritage Commission. Letters requesting consultation and follow-up phone calls were made to the following Tribal Governments:

- Table Mountain Rancheria,
- Santa Rosa Rancheria,
- Big Sandy Rancheria of Mono Indians, and the
- North Fork Mono Tribe.

At the time this draft MEIR was published, no requests for consultation or additional information have been received from the above listed Tribal Governments.

c. Local Policies and Regulations

The Coalinga General Plan (1994) requires protection of archaeological and historical resources to the greatest extent feasible.

3. Thresholds of Significance

Appendix G of the CEQA *Guidelines* indicates that impacts from the project would be considered significant if the project would:

a. Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5.
b. Cause a substantial adverse change in the significant of an archaeological resource pursuant to §15064.5.
c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.
d. Disturb any human remains, including those interred outside of formal cemeteries.

Generally, intact cultural and historic deposits are considered significant. Severely disturbed or mixed deposits often are not considered significant but may have educational value. Human remains and associated goods are afforded special consideration, even when fragmentary, and are considered significant.

4. Impact Assessment and Methodology

This impact assessment focuses on identifying potential project-related impacts associated with implementation of the proposed General Plan, and is based on comparing anticipated areas of development to those areas likely to contain prehistoric or historic resources. Impact assessment is general in nature because specific information regarding the location and type of future development is not known at this time.

Paleontological resources are generally found in sedimentary bedrock formations. The majority of the project area is located on alluvium of considerable depth (refer to Chapter V.A., Geology). Bedrock is not expected to be encountered during construction activities. Therefore impacts to paleontological resources are not expected.

5. Impacts Discussion and Proposed Mitigation Measures

The impacts and mitigation measures discussed below have been developed based on information gained through a review of cultural resources records in the Coalinga area, review of previously prepared site –specific cultural resource surveys, and a review of proposed land uses and policies in the proposed General Plan.

CR Impact 1 Implementation of the proposed General Plan could result in disturbance, alteration, or destruction of subsurface archaeological prehistoric resources, or in devaluation, disturbance, alteration, or destruction of historic areas, sites, and structures.

According to the proposed General Plan, 7,892 acres within the proposed SOI would be converted to urban uses by 2025. The city of Coalinga and surrounding areas are located within the ethnographic territory of the Southern Yokuts people. The Southern Yokuts homeland was centered near water sources resulting in the majority of subsurface resources being found primarily on the shores of nearby lakes and water sources. Development in these areas could damage or destroy prehistoric resources, if present, during excavation and/or grading. Even if such resources are adequately recorded, removal and/or destruction from their place of origin reduces their value as resources.

Although many were destroyed during the 1983 earthquake, documented historic resources are located within the existing city limits. Additional as yet unidentified historic resources may be located within the proposed SOI. These resources can be significantly impacted during demolition activities and/or loss of context as new development occurs.

Urbanized areas that previously have been developed are not likely to contain subsurface, prehistoric resources. However, land that has been used for certain types of agricultural

production, grazing, or other activities that do not require extensive excavation and/or grading, or that is vacant, could contain such resources, particularly near drainages and in woodlands. The potential loss or degradation of archaeological or prehistoric resources is considered a significant impact.

Mitigation Measures in Proposed General Plan
Policies and implementation measures that reduce impacts to a less than significant level have been included in the proposed General Plan and are listed as follows:

OSC2-1 Identify and protect significant historic and archaeological resources in the city of Coalinga. Associated Implementation Measures include: OSC2-1.1 through OSC2-1.5.

In addition to this policy, all subsequent projects that will undergo discretionary review will be subject to CEQA rules and regulations, which requires mitigation for project that may result in potential impacts to cultural resources.

Residual Impact
With implementation of these policies, impacts would be considered *less than significant.*

6. Cumulative Impacts

Implementation of the proposed General Plan is one component of significant growth expected within Fresno County and the San Joaquin Valley by 2025. Given existing information and the geographic setting of the city, it is reasonable to expect that cultural resources exist within the proposed SOI area. Because a portion of future development projects will most likely be found consistent with the General Plan and not subject to discretionary approval, there is a potential that unidentified cultural resources will be disturbed. Cumulatively these projects could result in the loss of and damage to unidentified cultural resources. However, given the policies proposed in the General Plan, and the likelihood that potential annexation projects, because they are subject to CEQA review, would include consideration of cultural resources, cumulative impacts are considered less than significant.

D. BIOLOGICAL RESOURCES

This section of the MEIR addresses potential impacts resulting from implementation of the proposed General Plan on biological resources, and describes the biological resources found within the boundaries of the proposed Coalinga General Plan, referred herein as the Biological Study Area (BSA). The BSA includes the existing city limits of Coalinga, the proposed Coalinga SOI, the AOI, and the Coalinga Conservation Bank-Kettleman Hills/Guijarral Hills/Anticline Ridge Habitat Linkage (CCB) (refer to Figure V.D.-1). This analysis evaluates potential biological impacts resulting from future build-out under the proposed General Plan. Policies within the proposed General Plan have been reviewed and mitigation measures are recommended where appropriate.

Biological resources within the BSA were evaluated based upon thoroughly reviewing elements of the proposed General Plan, aerial photographs, database queries, including the California Natural Diversity Database (CNDDB), and conducting literature research for pertinent documents from federal, state, and local resource agencies, as well as previous biological studies conducted within the area. The literature research included reviewing the following documents:

- Argonaut Ecological Consulting, Inc. Biological Evaluation Report for Los Gatos Creek Estates Project, Coalinga, California. Prepared for Los Gatos Creek Estates and Dirk Poeschel Land Development Service ; April, 2004.
- Leitner, Barbara. 1994. Habitat Management Plan, New Coalinga Municipal Airport. Prepared for City of Coalinga Planning Department, Coalinga, CA; 17 pp.
- Live Oak Associates, Inc. Biological Evaluation for 137.6-acre Warthan Creek Subdivision, Coalinga, California. Prepared for Peters Engineering Group; November 10, 2004.
- Morro Group, Inc. 2006. Coalinga Wastewater Treatment Facility EIR. Prepared for the City of Coalinga Planning Department, April 2006.
- Toyon Environmental Consulting, Inc. 2005. Administrative Draft Coalinga Habitat Conservation Plan (HCP). Prepared for the City of Coalinga; May 6, 2005.
- United States Fish and Wildlife Service (USFWS). 1992. Formal Endangered Species Consultation on the Proposed New Coalinga Airport, Fresno County, California AIP Project NO. 3-06-0046-01. Prepared for Federal Aviation Administration; April 3, 1992.

Based on the literature review and additional ground truth surveys conducted by Morro Group/SWCA biologists, a description of existing plant communities and wildlife habitats known to occur in the BSA are described in the following section.

1. Environmental Setting

Climate in the Coalinga area is typical of that of the Southern San Joaquin Valley, cool and foggy winters with little precipitation and hot dry summers with no rainfall. The average maximum temperature, average minimum temperature and average total precipitation for the Coalinga area is 78.2° F, 48.7° F and 7.71 inches, respectively. Topography of the Coalinga area

consists of flat to gently rolling hills, with perennial streambeds bisecting the area, which originate on the eastern side of the inner Coast Range and drain from west to east. Elevations in the Coalinga area range from 660 to 680 feet above sea level. The dominant plant communities in the Coalinga area include annual grassland, composed almost entirely of non-native grass species, and saltbush scrub dominated by species of the goosefoot family (Chenopodiaceae). A description of plant communities and wildlife habitats within the BSA is provided below.

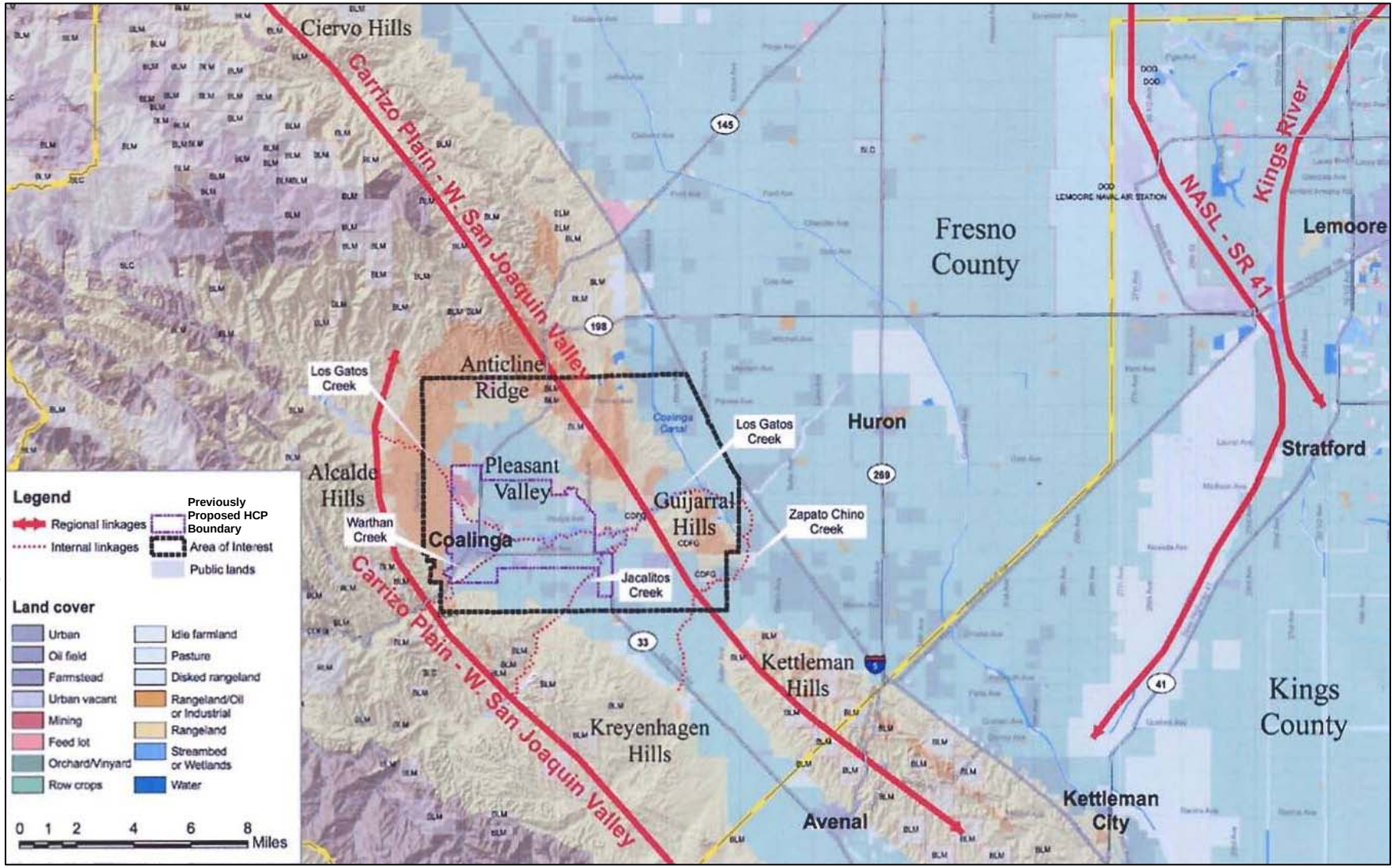
a. Plant Communities and Wildlife Habitat

The most extensive plant communities found in the Coalinga area are non-native annual grasslands and valley saltbush scrub. These two communities co-occur in a mosaic. Soil, slope, aspect, fire, and grazing regimes, and other human and natural disturbances influence the distribution of these communities. Other natural communities present in the BSA in limited areas are riparian, wetlands, valley saltbush scrub and ruderal areas. Basic descriptions of these communities are provided in the following discussion. Land cover is graphically displayed in Figure 3-1 of the CHCP and is included by reference.

1) Non-native Annual Grassland

Non-native annual grassland is found throughout most of California, primarily below 3,000 feet on fine-textured, usually clay soils. Non-native grassland habitats are very extensive in the Guijarral Hills, Anticline Ridge, and Jacalitos Canyon. Kettleman Hills and Warthan Creek southwest of Coalinga also have extensive non-native grassland habitats. Characteristic grassland species typically present in this plant community in the BSA include, but are not limited to: *Bromus rubens, Lepidium nitidum, Holocarpha heermani, Salsola iberica (=pestifera), Bromus diandrus, Emerocarpus setigerus, Plantago erecta, Schismus arabicus, Lasthenia chryostoma, Avena fatua, Amsinkia mentzesii*.

Non-native grassland habitat can provide important habitat features for a variety of wildlife species. Raptors such as prairie falcon (*Accipiter mexicanus*), red-tailed hawk (*Buteo jamaicensis*), red-shouldered hawk (*Buteo lineatus*), white-tailed kite (*Elanus leucurus*), American kestrel (*Falco sparverius*), and great horned owl (*Bubo virginianus*) often utilize these areas for foraging purposes, while species such as western meadowlark (*Sturnella neglecta*) use grassland areas for nesting. Reptiles commonly found within grassland habitats include western fence lizard (*Sceloporous occidentalis*), Pacific gopher snake (*Pituophis melanoleucus*), and western rattlesnake (*Crotalus viridis*). Other mammals potentially present in these areas include coyote (*Canis latrans*), black-tailed deer (*Odocoileus hemionus*), raccoon (*Procyon lotor*), striped skunk (*Mephitis mephitis*), and brush rabbit (*Sylvilagus bachmani*). In addition, various species of bat including Townsend's western big-eared bat (*Plecotus townsendii*) and pallid bat (*Antrozous pallidus*) may nocturnally forage within these areas.



Source: Toyon Environmental Consulting, Inc., 2005

Habitat Linkages within Project Area
FIGURE V.D.-1

Back of Figure V.D.-1

2) Riparian

Riparian communities occur adjacent to existing flowing stream channels, along seasonally flooded arroyos, or in depressional areas located close to ground water. Within the BSA, riparian habitat occurs within Warthan Creek, Jacalitos Creek, and Los Gatos Creek. These communities often consist of one or more species of deciduous trees and/or shrubs and a variety of other shrubs and herbs, many of which are restricted to the banks and floodplains of these waterways. Occasionally the trees of riparian communities are tall and dense enough to form a riparian forest, while other times the trees are more scattered and smaller, forming riparian scrub habitat. The extent of the vegetation away from the watercourse is dependant on the size and nature of the banks and floodplains, the amount of water conveyed by the waterway, and the depth and lateral extent of standing water and/or subterranean aquifers. Types of riparian areas which occur along the drainages within the BSA consist of habitats such as: central coast cottonwood riparian forest, tamarisk scrub, and mulefat scrub.

Riparian habitats support a wide diversity of wildlife due to the availability of important features such as nesting sites, escape and thermal cover, food, and dispersal corridors. Semi-aquatic and terrestrial wildlife species which may utilize the riparian habitat may include special-status species such as, southwestern pond turtle. Riparian vegetation also provides adequate nesting, roosting, and foraging habitat for a variety of migratory songbirds, as well as various raptors.

In addition to nesting migratory birds, a variety of vertebrate species that would be expected to occur in, or frequent, the riparian area include: Pacific gopher snake, common garter snake (*Thamnophis sirtalis*), Virginia opossum (*Didelphis virginiana*), striped skunk, and raccoon.

3) Wetlands

Refer to discussion provided in Section A.1.b below.

4) Valley Saltbush Scrub

Valley saltbush scrub is generally found in the southwestern San Joaquin Valley on dissected alluvial fans with flat to gently rolling relief. Soils are sandy and loamy without surface alkalinity. This community is dominated by gray-green or blue-green shrubs of the goosefoot family (Chenopodiaceae) with a sparse understory of short, annual herbaceous vegetation. Saltbush scrub ranges from open to dense stands (ten to forty percent shrub cover).

Saltbush scrub in the BSA is dominated by valley saltbush (*Atriplex polycarpa*), with a mixture of the following species: *Gutierrezia bracteata, Haplopappus acradenius, Eriogonum fasiculatum* var. *foliosum, E. anglulosum, Stephanomeria pauciflora,* and *Spergularia marina* var. *marina.* Within the general area, saltbush scrub is most abundant in the Kettleman Hills, Warthan Creek, and in some portions of the Jacalitos Canyon. There are scattered stands of saltbush scrub habitats in the Guijarral Hills, but there is very little in the Anticline Ridge area. Historically, this habitat type was probably more extensive in these areas, but grazing and agricultural practice have reduced its distribution and it has since been replaced by non-native grassland and cultivated fields. Saltbush scrub habitat provides wildlife habitat for wildlife species such as those found within the non-native grassland habitat described above.

5) Ruderal

Ruderal habitats are usually found in disturbed areas that have been significantly altered by construction, landscaping, or other types of land-clearing activities. Ruderal habitats often occur along roadsides and fence-lines, near developments, and in other areas experiencing severe ground disturbance. Plants found within this habitat area typically introduced, weedy, Mediterranean species that exhibit adaptations such as clinging seeds, adhesive stems, and rough leaves that assist their invasion and colonization of disturbed lands. The wildlife habitat value provided by this community is expected to be minimal due to the level of disturbance in the area. Cleared areas that receive very little human traffic are used by reptiles as basking areas and by mammals as movement corridors. Birds may also use dirt roads for dusting and for obtaining gravel needed in their digestion.

b. Jurisdictional Waters of the United States

The BSA includes many areas that are classified as jurisdictional waters of the United States, which are regulated by the Army Corps of Engineers (ACOE) and/or the California Department of Fish and Game (CDFG). These include Los Gatos Creek, Warthan Creek, Jacalitos Creek, multiple unnamed drainages and seasonal wetlands (refer to Figure V.B.-1). Not all of the Corps regulated jurisdictional waters or wetlands contained within the BSA have been identified to date. These potential jurisdictional waters of the U.S. and wetlands have not been field verified for the presence of definable channels, wetland vegetation, riparian habitat, hydric soils, and hydrology.

c. Sensitive Communities, Plants, and Wildlife Species

Based on information obtained by the CNDDB query for the project site, a review of previously conducted surveys, and a literature review, the following is a compiled list of sensitive species and sensitive communities known to occur in the region. Sensitive species or sensitive communities which are known, or have the potential, to occur within the vicinity of the project site are discussed in the following sections.

1) Sensitive Communities

For the purposes of this section, sensitive communities include habitats listed by either the CDFG (Holland, 1986) or the CNDDB (2006) as meriting protection or further study due to their rarity or value. As a result, one sensitive community (Great Valley Mesquite Scrub) was also identified during the CNDDB search as occurring within the Coalinga quadrangle and the eight surrounding quadrangles.

2) Sensitive Plant Species

For the purposes of this section, sensitive plant species are defined as plants that are:

- Plants listed or proposed for listing as threatened or endangered under the Federal Endangered Species Act (50 CFR 17.12 for listed plants and various notices in the Federal Register for proposed species).

- Plants that are candidates for possible future listing as threatened or endangered under the Federal Endangered Species Act (Federal Register Vol. 67, No. 114, pp. 40657-4067, June 13, 2002).
- Plants that meet the definitions of rare or endangered species under the CEQA (State CEQA *Guidelines*, §15380).
- Plants considered by the California Native Plant Society (CNPS) to be "rare, threatened, or endangered" in California (Lists 1B and 2 in CNPS, 2001).
- Plants listed by CNPS as plants about which we need more information and plants of limited distribution (Lists 3 and 4 in CNPS, 2001).
- Plants listed or proposed for listing by the State of California as threatened or endangered under the California Endangered Species Act (14 CCR 670.5).
- Plants listed under the California Native Plant Protection Act (California Fish and Game Code 1900 et seq.).
- Plants considered sensitive by other Federal agencies (i.e., U.S. Forest Service, Bureau of Land Management), state and local agencies, or jurisdictions.
- Plants considered sensitive or unique by the scientific community or occurring at the limits of its natural range (State CEQA *Guidelines*, Appendix G).

Based on a query of the CNDDB (2006) and the CNPS Electronic Inventory of Rare and Endangered Plants (2006), a total of twelve sensitive plant species were identified as occurring within the region (refer to Appendix B for more detailed species information). Because this list of sensitive plant species is regional, all species included within this list should be considered for the purposes of analyzing future impacts associated with build-out under the proposed General Plan, given the presence of suitable habitat.

- Heartscale (*Atriplex cordulata*)
- Brittlescale (*Atriplex depressa*)
- Lesser saltscale (*Atriplex minuscula*)
- Lost Hills crownscale (*Atriplex vallicola*)
- Dwarf calycadenia (*Calycadenia villosa*)
- California jewel-flower (*Caulanthus californicus*)
- Hall's tarplant [*Hemizonia (Deiandra) halliana*]
- Recurved larkspur (*Delphinium recurvatum*)
- Hoover's woolly-star (*Eriastrum hooveri*)
- Pale-yellow layia (*Layia heterotricha*)
- San Joaquin woolly-threads [*Lembertia (Monolopia)congdonii*]
- Showy madia (*Madia radiata*)

3) Special-status Wildlife Species

For the purposes of this section, sensitive wildlife species are defined as animal species that:

- Animals listed or proposed for listing as threatened or endangered under the Federal Endangered Species Act (50 CFR 17.11 for listed animals and various notices in the Federal Register for proposed species).
- Animals that are candidates for possible future listing as threatened or endangered under the Federal Endangered Species Act (Federal Register Vol. 67, No. 114, pp. 40657-4067, June 13, 2002).
- Animals that meet the definitions of rare or endangered species under the CEQA (*State CEQA Guidelines*, §15380).
- Animals listed or proposed for listing by the State of California as threatened and endangered under the California Endangered Species Act (14 CCR 670.5).
- Animal species of special concern to the CDFG (Remsen, 1978 for birds; Williams, 1986 for mammals).
- Animal species that are fully protected in California (California Fish and Game Code, §3511 [birds], §4700 [mammals], and §5050 [reptiles and amphibians]).

Based on a CNDDB query, a total of thirty individual sensitive wildlife species, in addition to several bat species, have been documented in the region (refer to Appendix B for more detailed species information). Because this list of species is regional, all wildlife species within this list should be considered for the purposes of analyzing future impacts associated with build-out under the proposed General Plan, given the presence of suitable habitat.

Insects

- San Joaquin dune beetle (*Coelus gracilis*)
- Redheaded sphecid wasp (*Eucerceris ruficeps*)
- Hopping's Blister Beetle (*Lytta hoppingi*)
- Molestan blister beetle (*Lytta molesta*)
- Morrison's blister beetle (*Lytta morrisoni*)

Amphibians

- Western spadefoot [*Scaphiopus (Spea) hammondii*]
- Foothill yellow-legged frog (*Rana boylii*)

Reptiles

- Western pond turtle (*Clemmys marmorata*)
- Blunt-nosed leopard lizard (*Gambelia sila*)
- San Joaquin coachwhip (*Masticophis flagellum ruddocki*)
- Coast (California) horned lizard (*Phrynosoma coronatum frontale*)

Birds

- White-tailed kite (*Elanus leucurus*)
- Northern harrier (*Circus cyaneus*)
- Golden eagle (*Aquila chrysaetos*)
- Prairie falcon (*Falco mexicanus*)

- Swainson's hawk (*Buteo swainsonii*)
- Short-eared owl (*Asio flammeus*)
- Western burrowing owl (*Athene cunicularia hypugea*)
- Le Conte's thrasher (*Toxostoma lecontei*)
- Tricolored blackbird (*Agelaius tricolor*)
- Loggerhead shrike (*Lanius ludovicianus*)
- California horned lark (*Eremophila alpestris actia*)
- Lark sparrow (*Chondestes grammacus*)

Mammals

- Roosting bat species (Order Chiroptera)
- San Joaquin antelope squirrel (*Ammospermophilus nelsoni*)
- San Joaquin pocket mouse (*Perognathus inornatus inornatus*)
- Giant kangaroo rat (*Dipodomys ingens*)
- Short-nosed kangaroo rat (*Dipodomys nitratoides brevinasus*)
- Tulare grasshopper mouse (*Onychomys torridus tularensis*)
- San Joaquin kit fox (*Vulpes macrotis mutica*)

2. Regulatory Setting

a. Federal Policies and Regulations

1) Section 404 of the Clean Water Act

Regulatory protection for water resources throughout the United States is under the jurisdiction of the ACOE. Section 404 of the Clean Water Act prohibits the discharge of dredged or fill material into Waters of the U.S. without formal consent from the ACOE. Waters of the U.S. includes Special Aquatic Sites (e.g., marine waters, tidal areas, stream channels, and wetlands). Impacts to biological resources are assessed as part of the 404 permitting process through consultation with the USFWS. Policies relating to the loss of aquatic habitats generally stress the need to compensate losses on at least an acre-for-acre (1:1) basis. Under Section 404, actions in Waters of the U.S. may be subject to either an individual permit or a general permit, or may be exempt from regulatory requirements. Some activities have been given blanket authorization under the provisions of a general permit through the Nationwide Permit system.

2) Section 401 of the Clean Water Act

Section 401 of the Clean Water Act and its provisions ensure that federally permitted activities comply with the federal Clean Water Act and state water quality laws. Section 401 is implemented through a review process that is conducted by the Regional Water Quality Control Board (RWQCB), and is triggered by the Section 404 permitting process. The RWQCB certifies via the 401 process that a proposed project complies with applicable effluent limitations, water quality standards, and other conditions of California law. Evaluating the effects of the proposed project on both water quality and quantity (runoff) falls under the jurisdiction of the RWQCB. Proposed project activities that have the potential to result in impacts to water quality and quantity would require certification by the RWQCB.

3) Federal Endangered Species Act

The Federal Endangered Species Act (FESA) of 1973 (50 CFR 17) provides legal protection for plant and animal taxa that are in danger of extinction, and classified as either threatened or endangered under the ESA. The FESA requires federal agencies to make a finding on all federal actions, including the approval by an agency of a public or private action, such as the issuance of an ACOE permit under Section 404 of the Clean Water Act, as to the potential to jeopardize the continued existence of any listed species potentially impacted by the action.

Section 9 of the FESA protects federally listed plant and animal species from unlawful take. "Take" is defined as "to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct." The USFWS regulates activities that may result in "take" of listed species. Impacts to listed species resulting from the implementation of a project would require the responsible agency or individual to formally consult with the USFWS to determine the extent of impact to a particular listed species. If USFWS determines that impacts to a listed species would likely occur, alternatives and measures to avoid or reduce impacts must be identified. If a proposed project has a federal nexus, such as requiring the authorization of a federal permit, and may affect federally listed species, a USFWS incidental take authorization may be required via a Section 7 Biological Opinion. If there is no federal nexus, incidental take authorization may be require a Habitat Conservation Plan via Section 10. USFWS also regulates activities conducted in federally designated critical habitats, which are geographic units designated as areas that support primary habitat constituent elements for listed species.

4) Migratory Bird Treaty Act

The federal Migratory Bird Treaty Act protects all migratory birds, including their eggs, nests, and feathers. The Migratory Bird Treaty Act was originally drafted to end the commercial trade in bird feathers popular in the latter part of the 1800's. This Act is enforced by the USFWS, and potential impacts to species protected under this law are evaluated by the USFWS in consultation with the ACOE during 404 review.

b. State Policies and Regulations

1) California Endangered Species Act

California has a parallel mandate to the FESA, which is embodied in the California Endangered Species Act (CESA) of 1984 and the California Native Plant Protection Act of 1977. The CESA ensures legal protection for plants listed as rare or endangered, and wildlife listed as threatened or endangered. The CDFG regulates activities that may result in the "take" of such species. The CDFG also maintains a list of California Special Concern (CSC) species based on limited distribution, declining populations, diminishing habitat, or unusual scientific, recreational, or educational value. Under state law, the CDFG is empowered to review projects for their potential to impact state-listed species and California Special Concern species, and their habitats.

Certain plants are listed as rare or endangered by the CNPS, but have no designated status CESA; however, CDFG has authority during the CEQA process to review potential impacts to rare plant species and require mitigation to reduce the level of significance. The CEQA *Guidelines*, §15065 requires that a reduction in numbers of a rare or endangered species be considered a significant effect. CEQA *Guidelines* §15380 provides for assessment of unlisted

species as rare or endangered under CEQA if the species can be shown to meet the criteria for listing. Unlisted plant species on the California Native Plant Society's Lists 1A, 1B, and 2 are typically considered under CEQA.

2) Section 1600 of the Fish and Game Code

Section 1600 of the Fish and Game Code requires any person, state or local government agency, or public utility proposing a project that may impact a river, stream, or lake to notify the CDFG before beginning the project. If activities will result in the diversion or obstruction of the natural flow of a stream, or substantially alter its bed, channel, or bank, or adversely affect existing fish and wildlife resources, a Streambed Alteration Agreement is required. A Streambed Alteration Agreement lists the CDFG conditions of approval relative to the proposed project, and serves as an agreement between an applicant and the CDFG for a term of not more than five years for the performance of activities subject to this section.

c. Local Policies and Regulations

The areas evaluated in this EIR are proposed to be within the city limits, SOI, and AOI as identified in the proposed Coalinga General Plan. An indicator of community sensitivity to biological issues can be found in applicable planning policies and guidelines, including the City's Zoning Ordinance, General Plan 2015, and the Fresno County General Plan (2000).

Additionally, it should be mentioned that the City of Coalinga initiated the Coalinga Habitat Conservation Plan (CHCP) in 2005. Under Section 10 of the ESA, an HCP accompanies an incidental take permit for non-Federal activities that will result in "take" of federally threatened or endangered wildlife. The proposed CHCP would allow for a streamlined permitting at the local level, sharing of costs among participants, and conservation and stewardship of sensitive biotic resources. The City intends to complete the CHCP process once the proposed General Plan is approved. At this point substantial work may still be required prior to completion of the CHCP, including completion of an environmental document, such as an EIS.

3. Thresholds of Significance

Impacts to biological resources were evaluated by determining the sensitivity, significance, or rarity of each resource that would be adversely affected (either directly or indirectly) by the proposed General Plan, and by using thresholds of significance to determine if the impact constitutes a significant impact. The significance threshold may be different for each habitat or species and is based upon the rarity or sensitivity of the resource and the level of impact that would result from the proposed project. Guidance for determining significance thresholds is based on Appendix G of the State CEQA *Guidelines* and local/regional general plans and ordinances. Using these guidelines, implementation of the proposed General Plan would have a significant impact on biological resources if it would:

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 CDFG or the USFWS;

b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by CDFG or USFWS;
c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act;
d. Interfere substantially with the movement of any resident or migratory species of wildlife, wildlife corridors, or wildlife nursery sites;
e. Conflict with any local policies or ordinances protecting biological resources; or,
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.

4. Impact Assessment and Methodology

This impact assessment focuses on identifying potential impacts associated with implementation of the proposed General Plan, and is based on details within the project description (Chapter III). Potential impacts are expected to occur where proposed construction or development activities directly impacts a sensitive species or would result in temporary or permanent modification of sensitive communities or habitats occupied by special-status species or other biological resources. Policies included within the proposed General Plan are focused on minimizing these impacts associated with future build-out. The purpose of this impact assessment is to review those policies in sufficient detail to determine if the existing policies are adequate or if additional mitigation measures are necessary in order to avoid or minimize adverse effects to biological resources.

5. Impacts Discussion and Proposed Mitigation Measures

BIO Impact 1 Implementation of the proposed General Plan could significantly impact sensitive species and sensitive habitats (including wetlands) within and adjacent to the city boundaries.

Implementation of the proposed General Plan has the potential to impact sensitive species and sensitive habitats through new development in undeveloped areas. Impacts associated with new development, along with growth and urbanization, include: 1) loss of habitat due to direct habitat removal; and, 2) habitat degradation due to secondary effects. Secondary effects include water quality impacts, increased noise and lighting, intrusion of domestic animals, increased human use for recreation and the invasion of weeds. These impacts are associated with the change in underlying land use from open space to urban or residential.

Several fully protected species have been documented in the vicinity of the city in the Draft HCP; it is possible that any development would unavoidably take habitat or the species identified even though the proposed General Plan includes policies and associated implementation measures to reduce or mostly avoid this risk. A multiple species HCP would not eliminate this risk but it would provide a framework for reducing impacts and mitigating significant effects.

Ultimately the City would need to identify a "Coalinga Preserve" or similar that builds on the existing mitigation lands that the City already owns, including the Coalinga Airport Kit Fox Management Area. The goal of newly acquired lands would be to close gaps between the Guijarral Hills and the Kettleman Hills, which would require acquisition of agricultural lands or conservation easements. It is unclear at this time how much agricultural activity would be allowed in those areas if conservation easements were acquired.

Completion of the CHCP would require additional review by the USFWS and compliance with NEPA, the National Environmental Policy Act. Most likely an Environmental Impact Statement would need to be prepared (EIS). This process can be time consuming and costly, but is expected to ultimately streamline development process and provide adequate habitat protection for sensitive species.

Mitigation Measures in the Proposed General Plan

New policies in the proposed Conservation and Open Space Element of the proposed General Plan would reduce potential significant impacts. These policies and the associated implementation measures require all new development proposals to satisfy CDFG, ACOE, and USFWS regulations prior to and during new development. Specifically, Implementation Measure OSC 1-3.6 requires the City to coordinate with the USFWS to initiate completion of the CHCP process, including environmental review, within 6 months of General Plan approval. Relevant policies are listed below:

OSC1-1 Secure a diverse network of open land encompassing valuable natural and agricultural resources within and around the Coalinga urban area. Valuable resources include creek corridors, wetlands, native grassland communities and woodlands, wildlife habitat and corridors, groundwater resources, hills and ridgelines, open-space settings for cultural resources and prime agricultural soils and economically viable farmland. Associated Implementation Measures include: OSC1-1.1 and OSC1-1.2.

OSC1-2 Encourage the protection of streams, riparian corridors and unique or sensitive habitats. Associated Implementation Measures include: OSC1-2.1 through OSC1-2.5.

OSC1-3 Protect special-status plant and animal species and their habitat in accordance with local, state, and federal regulations. Associated Implementation Measures include: OSC1-3.1 through OSC1-3.6.

OSC1-4 Preserve and enhance habitat linkages recognized by regulatory agencies and/or identified during the development review process. Associated Implementation Measures include: OSC1-4.1 through OSC1-4.5.

OSC1-5 Encourage the protection of threatened and endangered species and their habitat addressed in the adopted Coalinga Habitat Conservation Plan (CHCP), while allowing for continued development. Until such time as the CHCP is adopted, the City shall look to the Draft CHCP (2005) for guidance.

Residual Impact

Although implementation of the General Plan would include completion of the CHCP process, and each new development project would be evaluated on a project-by-project basis to ensure that impacts to sensitive habitats (e.g., wetlands, habitat for special-status species) are mitigated in accordance with most current regulations, compliance with these regulations would not ensure that development through 2025 would be able to feasibly provide for "no net loss" of wetland habitat or habitats for sensitive species. Furthermore, as development reaches its anticipated levels, permanent habitat losses will cause an overall decrease in wildlife numbers in the region. Because "no net loss" cannot be are assured and due to the permanent loss of habitat associated with the proposed General Plan, this impact is considered *significant and unavoidable.*

6. Cumulative Impacts

In conjunction with projected growth and development within Fresno County, the proposed General Plan for Coalinga is expected to contribute to cumulative impacts to biological resources as the value and function of the plant and wildlife habitat would be reduced. In addition, opportunities for areas to mitigate would be reduced. Therefore, these cumulative impacts are considered *significant and unavoidable*.

E. AGRICULTURAL RESOURCES

This section of the MEIR addresses potential impacts resulting from implementation of the proposed General Plan on agricultural resources, and assesses the potential impacts to agriculture resources that may result from implementation of the proposed project. Information obtained from the County of Fresno, Natural Resources Conservation Service (NRCS), and Department of Conservation has been used to determine the existing agricultural setting of the area considered in the proposed General Plan, and potential impacts to those agricultural resources and those of the Fresno County.

1. Environmental Setting

a. Land Use Designation

The proposed SOI contains approximately 7,892 acres currently zoned Agriculture (twenty-acre minimum) by the County of Fresno Zoning Map, and designated Agriculture by the County of Fresno General Plan, and the existing Coalinga Regional Plan Land Use Element. This land use designation allows for the production of crops, livestock, agricultural commercial centers, agricultural processing facilities, and specific non-agricultural industries. Non-agricultural industries allowed per special permit issuance include, but are not limited to kennels, sewage treatment plants, churches, schools, golf courses, airports, detention facilities, mineral extraction, and gas and oil development.

b. Soils and Classifications

The NRCS assesses a soil agricultural productivity by utilizing the Land Capability Classification system and the Storie Index. The Land Capability Classification system classifies soil units based on limitations for field crop production, the risk of damage due to crop production, and how the soil responds to management (refer to Table V.E.-1). Soils receive an "irrigated" and non-irrigated" classification.

Soils located within the proposed SOI in the proposed General Plan are varied in some of their specific characteristics; however, the land capability class varies little. The majority of the lands located between the existing city limits and the proposed SOI are Class I or II irrigated.

The NRCS Class I designation indicates that this is prime agricultural land. With irrigation, these soils are highly productive, with few management-related constraints, and soil temperature and moisture conditions are ideal for annual crops. Soil management consists largely of sensible conservation practices to minimize erosion, appropriate fertilization, and use of best available plant materials. The risk for sustainable grain crop production is generally less than twenty percent.

The NRCS Class II designation indicates that the soils are good and have few problems for sustainable production; however, care must be taken to reduce degradation. The lower resilience characteristics of Class II soils make them more risky, particularly for low-input grain crop production. However, their productivity is generally very high and consequently, response to management is high.

TABLE V.E.-1
Land Capability Classifications

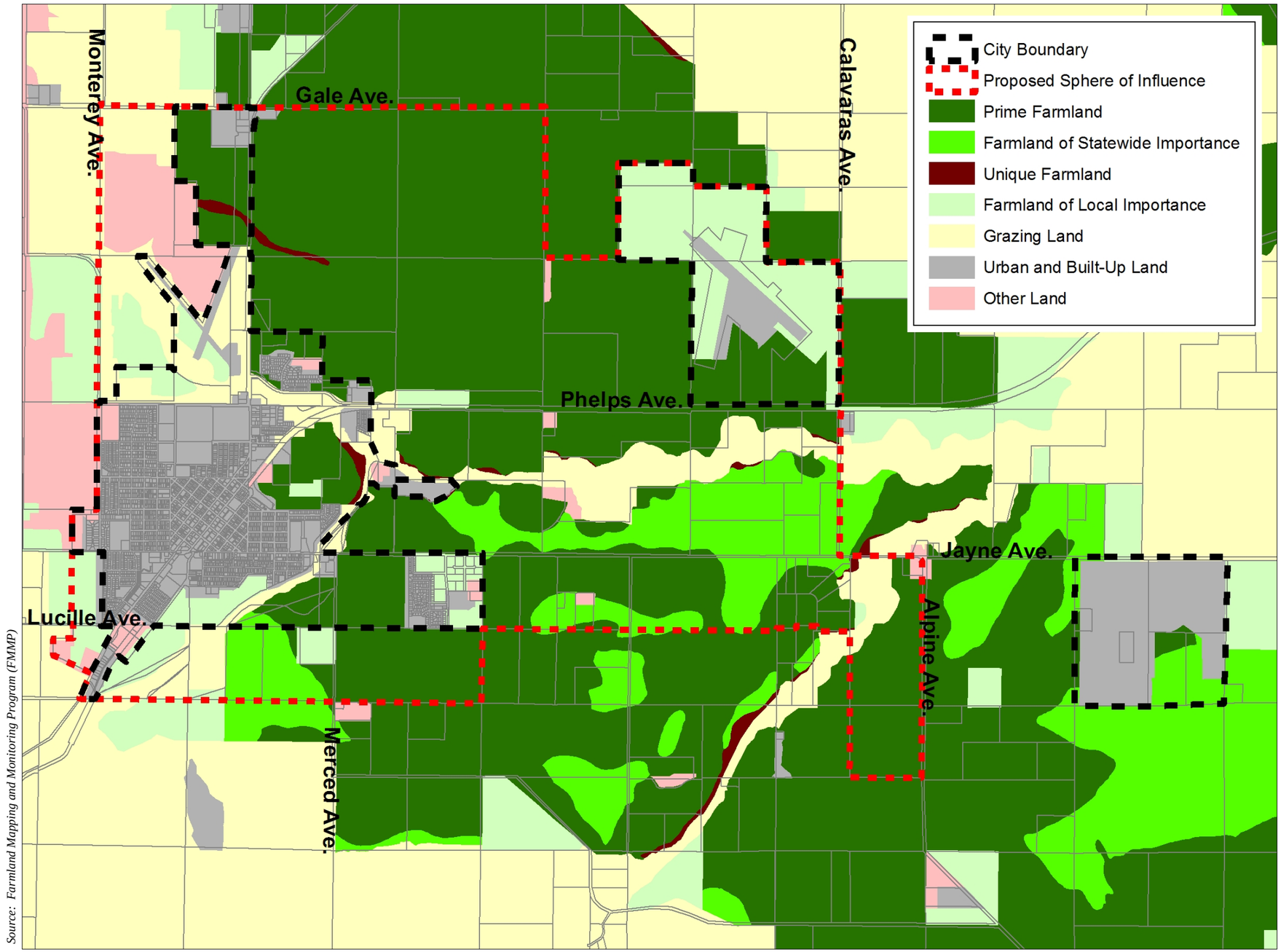
Class	Definition
I	Slight limitations that restrict use
II	Moderate limitations that reduce the choice of plants or require moderate conservation practices.
III	Severe limitations that reduce the choice of plants and/or require special conservation practices.
IV	Very severe limitations restricting the choice of plants and/or require very careful management.
V	Little or no hazard of erosion but have other limitations, impractical to remove, that limit their use mainly to pasture, range, forestland, or wildlife food and cover.
VI	Severe limitations that make them generally unsuited to cultivation and that limit their use mainly to pasture, range, forestland, or wildlife food and cover.
VII	Very severe limitations that make them unsuited to cultivation and that restrict their use mainly to grazing, forestland, or wildlife
VIII	Limitations that preclude their use for commercial plant production and limit their use to recreation, wildlife, or water supply or for esthetic purposes.

1) California Department of Conservation Designation

In addition to the NRCS soil classification described above, some of the soil types are considered Prime Farmland (if irrigated) by the California Department of Conservation (CDC). This designation is made in the California Farmland Mapping and Monitoring Program, which identifies the farmland classifications for those areas that have modern soil surveys.

Prime farmland is defined by the CDC as land that has the best combination of physical and chemical characteristics for the production of crops. It has the soil quality, growing season, and moisture supply needed to produce sustained high yields of crops when treated and managed, including water management, according to current farming methods. Prime farmland must have been used for the production of irrigated crops at some time during the two update cycles prior to the mapping date. Approximately 5,111 acres of lands outside of the current city limits and within the proposed SOI are designated Prime Farmland (refer to Figure V.E.-1).

Farmland of Statewide Importance is similar to Prime Farmland but with minor shortcomings, such as greater slopes or less ability to store soil moisture. Land must have been used for irrigated agricultural production at some time during the four years prior to the mapping date. Approximately 1,009 acres of lands outside of the current city limits and within the proposed SOI are designated Farmland of Statewide Importance (refer to Figure V.E.-1).



Source: Farmland Mapping and Monitoring Program (FMMP)

NORTH
Not to Scale

Prime Farmland and Farmland of Statewide Importance
FIGURE V.E.-1

Back of Figure V.E.-1

c. Agricultural Use of Acres included in the Proposed General Plan

The majority of the acreage (approximately 7,892 acres) included in the proposed SOI is currently zoned Agriculture and is either actively producing or has produced in the recent past. Crops include cotton, fruits nuts, and vegetables, and irrigated grains among others. Fresno County, which includes the proposed General Plan area, is one of the most productive agricultural areas in the nation. According to the *2004 Fresno County Agricultural Crop and Livestock Report* he total gross production value of Fresno County agricultural commodities in 2004 was nearly 4.7 billion dollars.

1) Agricultural Yields

To estimate local agricultural yields, a representative soil type was selected. Excelsior sandy loam (0 to2 percent) was chosen. This soil type underlies approximately 30 percent of the area between the existing city limits and the proposed new SOI. Cotton, which is commonly grown in the proposed SOI, was chosen as the representative crop. According to the NRCS the Excelsior sandy loam soil can produce approximately 1,200 pounds per acre.

Based on the *2004 Fresno County Agricultural Crop and Livestock Report*, the total gross production value of Fresno County agricultural commodities in was $4,691,224,200 in 2004, which is a 15.17 percent increase from the 2003 production value. Increases were seen in vegetable, fruit and nut crops, livestock, and poultry.

Approximately 260,000 acres totaling 458,064,000 pounds (1762 pounds per acre) of cotton was harvested in Fresno County in 2004, with a total dollar value of $361,327,000 (refer to Table V.E.-2). Based on the *2004 Fresno County Agricultural Crop and Livestock Report*, every dollar received by Fresno County producers results in the economic extension benefit of three and one-half dollars to the total economy of the county. This benefit is referred to as an economic multiplier of 3.5. The annual secondary economic benefit of cotton production in Fresno County in 2004 was $1,264,644,500. The average value of baled cotton was $0.78 per pound, or approximately $1,390 per acre. In addition, 344,100 tons of cotton seed was harvested in 2004, with an average value of $56,211,000.

Using these figures, and a proposed SOI area of 7,892 acres, the agricultural lands in the SOI could potentially produce approximately 7.4 million pounds of cotton, with a value of approximately $8,600,000.

TABLE V.E.-2
2004 Cotton Bale Yields

Crop	Production (Pounds/Acre)	Harvest (Acres)	Production (Pounds)	Value ($)
Upland (Acala)	1,831	151,000	276,481,000	197,886,000
Upland (Non-Acala)	1,979	14,200	28,101,800	19,544,000
Pima	1,619	94,800	153,481,200	143,897,000
Total		260,000	458,064,000	361,327,000

Source: 2004 Fresno County Agricultural Crop and Livestock Report

2) Williamson Act Contract

Approximately 6,683 acres (85 percent) of the acreage included in the proposed SOI is currently under a Williamson Act Contract. These contracts were established at various times. The terms of the contracts are generally up for renewal every ten years from the date the contract originally went into effect. Refer to Figure V.E.-2 for lands included under the Williamson Act Contract.

d. Use of Adjacent Properties

Land uses bordering the proposed General Plan SOI include irrigated and non-irrigated agricultural fields to the north, south, and east. These lands have similar soil types, uses, and contract commitments as the lands within the SOI.

2. Regulatory Setting

a. Federal Policies and Regulations

The Natural Resources Conservation Service Division of the United States Department of Agriculture facilitates programs to conserve natural resources, including but not limited to soils and agricultural land. The NRCS delegates responsibility to the California State Department of Conservation, and does not act as a regulatory agency regarding agriculture resources.

1) Farmland Protection Policy Act

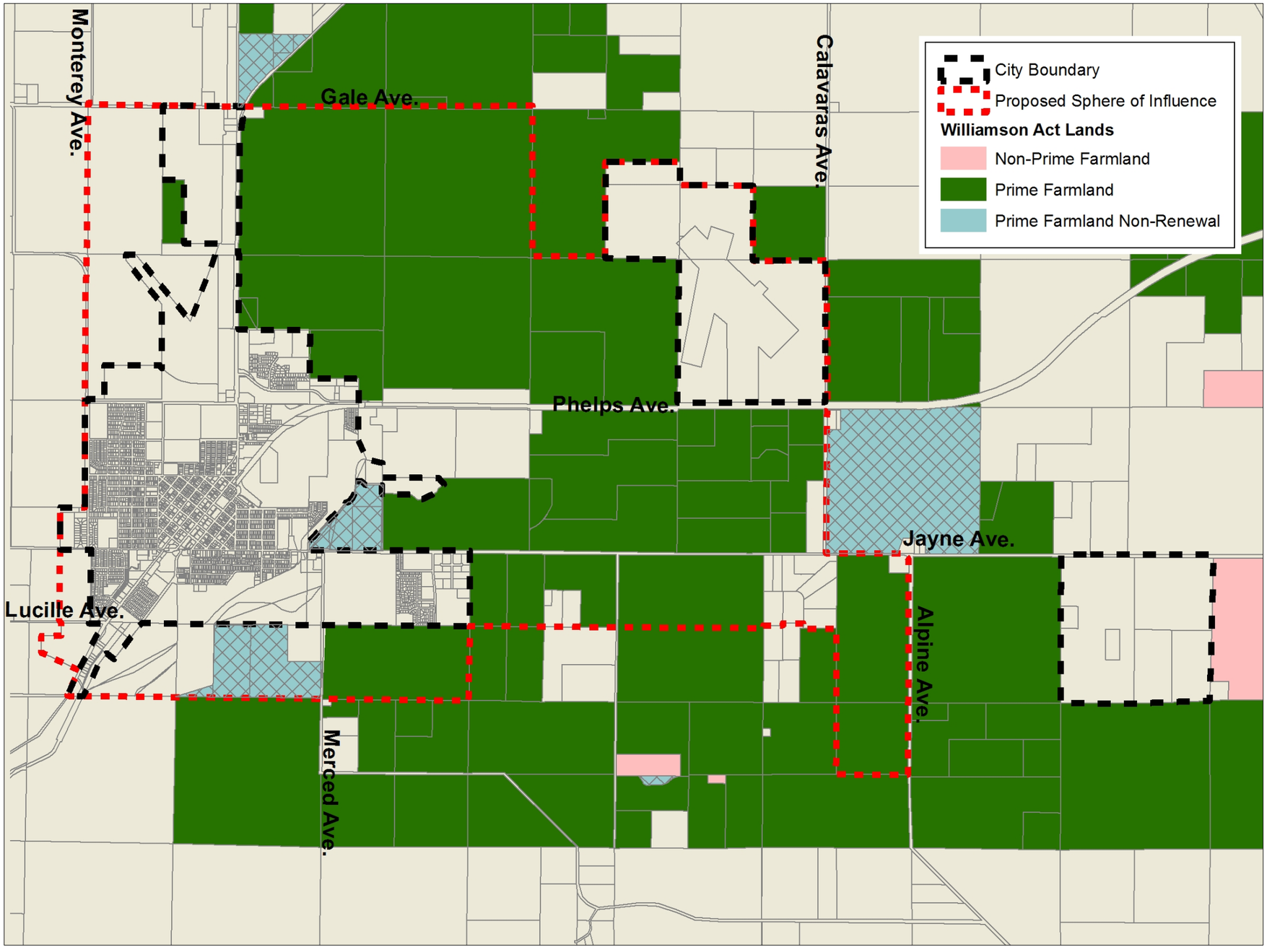
The Farmland Protection Policy Act (FPPA) was published in the Federal Register on June 17, 1994. Projects are subject to FPPA requirements if they may irreversibly convert farmland (directly or indirectly) to nonagricultural use and are completed by a Federal agency or with assistance from a Federal agency.

b. State Policies and Regulations

The CDC Land Resources Division provides information, maps, funding and technical assistance to local governments, consultants, Resource Conservation Districts, and non-profit organizations statewide with the goal of conserving the state's agricultural and natural resources. The Division facilitates the Farmland Mapping and Monitoring Program (FMMP) and Williamson Act Program.

1) Farmland Mapping and Monitoring Program

The FMMP produces maps and statistical data used for analyzing impacts on California's agriculture resources. Agricultural land is rated according to soil quality and irrigation status. The maps are updated every two years with the use of aerial photographs, a computer mapping system, public review, and field reconnaissance.



Source: California Dept. of Conservation, 2005

NORTH
Not to Scale

Williamson Act Lands within the Proposed AOI
FIGURE V.E.-2

Back of Figure V.E.-2

2) Williamson Act Program

The California Land Conservation Act of 1965 (Williamson Act) enables local governments to enter into contracts with private landowners for the purpose of restricting specific parcels of land to agricultural or related open space use. In return, landowners receive property tax assessments that are much lower than normal because they are based upon farming and open space uses as opposed to full market value. Provisions of the Williamson Act permit public acquisition of land under a Williamson Act Contract provided specific notification processes are completed, and special findings are adopted (Government Code §51291 and §51292).

c. Local Policies and Regulations

The project site is currently within the County of Fresno, and is subject to County general plan policies and ordinance requirements. The Fresno County Agricultural Commissioner's Office is responsible for conducting regulatory and advisory functions related to agriculture resources and the agriculture industry, and the Fresno County Department of Public Works and Planning Development Services Division is responsible for the management of agricultural preserves and land under Williamson Act Contract. Agriculture resources, and protection of agricultural land and production, are regulated by the County's Right-to-Farm Ordinance, which protects farming operations from interruptions due to land use conflicts with adjacent properties. The intent of the ordinance is to allow farmers to conduct normal farming operations (harvest crops, till soil, or spray crops) without interference from nearby landowners.

3. Thresholds of Significance

Appendix G of the CEQA *Guidelines* indicate that impacts from the project would be considered significant if the project would:

a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use.
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract.
c. Involve other changes in the existing environment, which due to their location or nature, could result in conversion of Farmland, to non-agricultural use.

For purposes of this EIR, because the economics of agriculture are well documented in Fresno County, an additional threshold was identified:

d. Financial loss associated with the conversion of agricultural lands using the secondary economic multiplier for Fresno County

4. Impact Assessment and Methodology

This impact assessment focuses on identifying the variety of existing and potential agricultural resources located outside of the existing city Limits but within the proposed SOI. The resources identified include soils designated Prime by Fresno County, Farmland of Statewide Importance, as defined by the State Department of Conservation, and the acreage of farmland that may be

under Williamson Act contracts. To quantify impacts, this EIR assumes that all land within the proposed SOI will be converted to either an urban use or Open Space as designated in the proposed Land Use Element of the proposed General Plan, and therefore it will no longer be capable of agricultural production.

5. Impacts Discussion and Proposed Mitigation Measures

AG Impact 1 Implementation of the proposed General Plan would convert approximately 5,111 acres of Prime Farmland and 1,009 acres of Farmland of Statewide Importance to non-agricultural use.

The conversion of prime agriculture lands to non-agricultural uses is a concern within the County and across the state. The CDC's FMMP tracks farmland conversion throughout the state during two-year cycles. From 2000-2002, it reported a net loss of 4,119 acres of Prime and Statewide Importance Farmlands in Fresno County. From 2002-2004, approximately 15,832 acres of this type was converted.

The majority of farmland losses statewide occur due to conversions to low-density residential uses, ecological restoration projects, or long-term land idling. Anticipated urban development, unavailability of irrigation water, soil issues, and economic factors are other reasons that land has gone idle (State of California FMMP). Based on a review of the proposed Land Use Element, the vast majority of the agricultural land that may be converted from agricultural use during implementation of the proposed General Plan will result from the introduction of residential and industrial uses.

Mitigation Measures in the Proposed General Plan

Based on policies and the Land Use Diagram in the proposed General Plan, including those that were incorporated as part of this environmental review, all of the agricultural land within the proposed SOI other than that designated for use by the new wastewater treatment plant, will eventually be converted to urban use and permanently removed from production by the year 2025. There are a number of Policies and Implementation Measures in the proposed General Plan that promote planned growth, and discourage leap-frog development, and these will ensure that impacts to agricultural resources do not occur prematurely. In addition, the following Policy directly addresses impacts related to conversion of agricultural lands by requiring development projects shall be required to mitigate for loss of farmland by either (1) granting a farmland conservation easement to or for the benefit of the city and/or a qualifying entity approved by the City, at a 1:1 ratio for each acre developed, or (2) by payment of an in lieu fee as established by the City, which shall be reviewed and adjusted periodically to ensure that the fee is adequate to offset the cost of purchasing farmland conservation easements at a 1:1 ratio. :

LU7-2 The City recognizes the loss of farmland as a result of urbanization of the city of Coalinga as a significant and unavoidable impact and shall require development projects to mitigate for the loss of farmland. Associated Implementation Measures include: LU7-2.1.

In-lieu fee programs exist and are implemented statewide to mitigate for impacts to biological resources, air quality, and transportation. Fee programs for impacts to agricultural resources may include collecting fees to be used to purchase agricultural easements on land of similar quality, for example. Easements could be purchased by the City or the fees could be donated to an agency or organization, such as the California Farmland Conservancy Program, dedicated to securing agricultural easements locally or in the region.

Residual Impact
Implementation of these and other proposed General Plan policies would reduce the impact of conversion; however, because prime soils are a finite resource, and it is considered infeasible to create new prime soils, the proposed General Plan would still result in a *significant and unavoidable impact.* An alternative that would reallocate land uses to lands not designated as Farmland of Statewide Importance may be a consideration; however, since all lands in the Coalinga vicinity are under Williamson Act contracts, this alternative could reduce significant impacts, but not to insignificance, and the impacts to conversion would still be unavoidable (refer to Chapter IV, Alternatives Analysis, of this MEIR for further discussion).

AG Impact 2 Implementation of the proposed General Plan would result in the loss of 6,061 acres of farmland currently enrolled in the Williamson Act program.

The Williamson Act was created in an effort to shield agricultural operations from tax burdens associated with the relatively high property values in California. Some jurisdictions use the amount of land "under contract" as one indicator of the health of local agricultural resources because the property owners who enter into contract have committed to producing agricultural commodities and have agreed not to develop their property for at least 10 years. Conversion of these lands to a non-agricultural use, especially at the scale that would occur consistent with the proposed General Plan, will cause a significant impact to agricultural resources.

Mitigation Measures in the Proposed General Plan
See discussion and mitigation measures for AG Impact 1 above.

Residual Impact
Implementation of the proposed General Plan policies would reduce the impacts resulting from reduced enrollment in the Williamson Act program; however it would still result in a *significant and unavoidable impact.* An alternative that would reallocate land uses elsewhere may be a consideration; however, since all lands in the Coalinga vicinity are under Williamson Act contracts, this alternative would not reduce significant impacts, and the loss of farmland would still be unavoidable (refer to the Alternatives, Section IV of this MEIR, for further discussion).

AG Impact 3 Implementation of the proposed General plan would result in the loss of approximately 7,892 acres of agriculturally productive land, resulting in a potential primary loss of approximately $10,969,880 and a secondary economic loss of $38,394,580.

This impact results from the loss of productivity of the agricultural lands in the proposed SOI as they are converted to urban uses. It is possible that the new uses would also contribute to the local and regional economy (construction, property taxes, sales tax, etc.), however until more specifics regarding the development of these properties is available, the potential economic benefits of the conversion cannot be quantified. Even if the new development contributed to the local economy, the loss described above still represents a significant loss to the agricultural economy in Fresno County, as much as ten percent (10 percent) of the total value of cotton production in Fresno County in 2004.

Mitigation Measures in the Proposed General Plan
See discussion and mitigation measures for AG Impacts 1 and 2 above.

Residual Impact
Implementation of these and other Draft General Plan policies would reduce the economic impacts of conversion; however it would still result in a *significant and unavoidable impact.*

AG Impact 4 Implementation of the proposed General Plan will result in the development of potentially incompatible urban uses adjacent to agricultural lands, increasing potential conflicts and reducing viability.

Urban land uses can conflict with agricultural operations in a variety of ways. Pesticide use, dust, odors, and noise associated with agricultural operations can irritate residents on neighboring parcels. Tractors and haul trucks that use public roads may slow traffic. Domestic animals can harass livestock, and trespassers can injure themselves, remove/break fences and gates or disrupt operations. These conflicts may result in stricter regulations for operations, reduced yields, or in some cases lawsuits, the costs of which can make agriculture less viable.

These conflicts are perhaps most significant at the first urban/agriculture interface. In the proposed SOI area, this interface occurs at parcels adjacent to the existing city Limits. Conflicts may be more likely in the areas zoned residential rural as well, due to increased density and a greater potential for conflicting land uses.

Mitigation Measures in the Proposed General Plan
New policies in the proposed General Plan would reduce potential impacts resulting from the introduction of incompatible uses. These policies are listed below:

LU7-1 New Development on the fringes of the City shall recognize the right of agriculture to exist and continue to operate in proximity to the development. Residential deed restrictions may be required which inform future residents of the right of agriculture to continue within the limits of the law without interference or protest from nearby property owners. Associated Implementation Measures include: LU7-1.1 and LU7-1.2.

In addition to this policy, there are a number of other land use policies and implementation measures included in the proposed proposed General Plan encouraging orderly growth, encouraging infill development, and discouraging "leapfrog" development. These include Implementation Measures LU1-1.2, LU1-5.7, and LU2-2.1.

Residual Impact
Implementation of these and other proposed General Plan policies and implementation measures would reduce the impact to a *less than significant level.*

6. Cumulative Impacts

Increased urbanization within and surrounding the city of Coalinga consistent with the proposed General Plan, including the proposed project, would result in the permanent conversion of land from agricultural use to residential, commercial, industrial, public facility, and other uses. Adoption of the proposed General Plan would enable growth to occur, resulting in a significant loss of agricultural land, and the likely non-renewal and cancellation of Williamson Act contracts within the city's proposed SOI. The cumulative loss of prime farmland, farmland of Statewide Importance, and agricultural preserves, would be *significant and unavoidable*.

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F. LAND USE, POPULATION, AND HOUSING

This section of the MEIR addresses potential impacts resulting from implementation of the proposed General Plan on existing land uses and future land use compatibility.

1. Environmental Setting

a. Historical Land Uses

The city of Coalinga was established late in the 19th century near the loading site of Coaling Station A. Development occurred adjacent to the spur of the Southern Pacific Railroad that served the coal loading site, and accelerated when oil was discovered in 1890. The city incorporated in 1906. Numerous small residences were built in the oil fields during the early 20th Century; many of these houses were later moved into the townsite. Two story brick structures were built in the downtown business district during this period.

In the late 1920s to early 1930s, oil and gas discoveries in the Kettleman Hills resulted in residential development surrounding the original town site. The oil and gas industry continued to expand after World War II. In addition, the opening of the Coalinga Canal resulted in considerable expansion of livestock and agricultural interests. Cotton was the principal crop in the region.

After the 6.5 magnitude earthquake in 1983, which destroyed most of the downtown business district, the City began a rebuilding and revitalization process, reconstructing the Community Hospital, annexing the areas used for the regional airport and the Pleasant Valley State Prison (PVSP), as well as the land for the recently completed Coalinga State Hospital (CSH), the mental health facility located adjacent to the prison to the east of the city. These facilities have created new jobs in the area and the population of the city has continued to grow. There is a potential for continued growth over the next 20 years.

b. Population Growth

The household population of Coalinga grew at an average annual rate of 2.3 percent from 1990 to 2000, for a total growth of 29 percent over the decade (8,102 to 10,448 according to DOF table E-8). Including the addition of the PVSP and the CSH group quarter population of 5,350, the total rises to 15,798 by the year 2000. The PVSP and the CSH, the two major group quarters within the city limits, have a combined population of approximately 3500 persons, not including support staff (PVSP and CSH). The following population discussion excludes these group quarters because they have a set capacity, and any changes in their population will not directly affect the availability of housing or other services in the city.

The Department of Finance population estimate for 2005 showed 11,217 people in the city of Coalinga, excluding group quarters, (PMC; Department of Finance, 2005). The 2000 DOF estimated 10,448 persons in the City in that year (Department of Finance Table E-5, 2008). The actual growth rate between 2000 and 2008 averaged 1.94 percent annually. Based on the historical growth rate and anticipated future residential development, the proposed General Plan projects that a three to five percent average annual growth rate cold be sustained over the next 20 years, which would add between 10,971 and 44,156 persons to the population. Based on this

projection, the General Plan build out would occur around the year 2025 with a population of between 22,188 and 55,373 residents. Table V.F.-1, taken from the proposed General Plan, shows the estimated annual growth from 2005 to 2025 given an annual average growth of 3.5 percent.

TABLE V.F.-1
Projected Population Growth, 2005-2025

Year	Population	Annual Growth Rate
2005	11,217	3.20 percent
2006	11,576	3.20%
2007	11,946	3.40%
2008	12,353	3.40%
2009	12,773	3.60%
2010	13,232	3.60%
2011	13,709	3.80%
2012	14,230	3.80%
2013	14,770	4.00%
2014	15,361	4.00%
2015	15,976	3.80%
2016	16,583	3.80%
2017	17,213	3.60%
2018	17,833	3.60%
2019	18,474	3.40%
2020	19,103	3.20%
2021	19,714	3.00%
2022	20,305	3.00%
2023	20,914	3.00%
2024	21,542	3.00%
2025	22,188 (a 20-year increase of 10,971 persons)	
Average Annual Growth 2005-2025		3.50%

Source: PMC 2008; Department of Finance, 2005

According to the Department of Finance, Coalinga grew by 17 percent between 2000 and 2008 with an average annual growth rate of 2.13%. In the prior decade (1999-2000) the City witnessed a 2.3 percent average annual growth rate. The proposed General Plan, however, assumes that growth could exceed the historic rate as well as the Department of Finance growth projections outlined in table V.F.-1. This assumption is based on the fact that a number of housing developments are currently proposed (refer to Table V.F.-2) that would provide 12,984 housing units for an additional population of 38,670 new residents (excluding group quarters), assuming the current occupancy rate of 3.0 people per household. To account for additional

growth both independent of, and in support of the currently proposed developments the General Plan Update estimates an additional 5,486 person increase in population resulting in a total General Plan buildout population objective of 55,373 in 2025. Please refer to Table III-2 that outlines the projected population growth during the tenure of the proposed General Plan given the proposed buildout population objective. Although the population objective proposed by the proposed General Plan exceeds historic growth rates, it is still well below Coalinga's maximum residential buildout potential of 81,240 as outlined in Table 2-9 of the proposed General Plan.

c. Housing Needs and the Annexation Process

1) Housing Needs

The current occupancy rate of residences in Coalinga, as discussed above, averages 3.18 residents per dwelling unit. The proposed General Plan assumes this rate is will continue over the 20 year horizon, and underlies the assumptions of housing needs of the projected population shown in Table V.F.-1.

The number of proposed housing developments, shown in Table V.F.-2, would provide enough housing for approximately 38,858 new residents, or 12,984 dwelling units, once completed. As shown below, only 1,880 of these dwelling units are located within the existing city limits. The construction of the additional housing developments would require the City to annex lands both within and outside of their existing SOI.

Currently, Coalinga's Housing Element indicates that the Fresno County Regional Housing Needs Allocation (RHNA) Plan specifies a need for 37 units annually (based on a 256 unit demand over 7 years; refer to page 4-2 of the City of Coalinga Housing Element). When compared to estimated growth rates assumed in the proposed General Plan and the resulting housing demand, the Fresno County estimate for housing is far below that which would be needed at current growth rates, which is estimated by the California Department of Finance to be 6.7 percent statewide over the next five years (Governor's Proposed Budget Summary), and just over 3 percent for Coalinga specifically (refer to Table V.F.-1). In order to meet its share of this statewide need, housing units in Coalinga will need to be planned for at a rate proportional to the state's population growth rate. Given this, the Housing Element indicates the need to pursue annexations to accommodate the projected housing needs (see Policy 2.1 in the Housing Element, page 6-3). The RHNA requirement of 256 additional units could be met through development located within the existing city limits.

TABLE V.F.-2
Current Development Proposals with Residential Components

Project	Acres	General Plan Land use	Dwelling Units	Population
FORESEEABLE DEVELOPMENT (within existing city limits)				
Juniper Ridge	24	RHD	217	651
School Farms	296	RSF, RMD, RHD, MX	955	2,865
Promontory Pt. II and III	28	RSF	75	225
Dorothy Allen III	14	RSF	48	144
Posa Chanet III	13	RSF	45	135
Warthan Creek	107	RSF	351	1053
Stallion Springs	27	RSF	95	285
Senior Living Facility2	7	RHD	94	188
Subtotal	*516*		*1,880*	*5,546*
POSSIBLE FUTURE DEVELOPMENT (outside existing city limits)				
Los Gatos Creek	3,310	RE, RSF, RMD, RHD, IND, CG, PF, REC	10,068	30,204
Warthan Heights	276	RSF, RMD	1,036	3,108
Subtotal	*3,586*		*11,104*	*33,312*
TOTAL	4,102		12,984	38,858

Source: PMC; City of Coalinga General Plan Update, 2005-2025, from the City of Coalinga, 2008

2) Annexation Process

Annexation of new land by a city is a process driven in large part by jursidictions seeking to obtain land that can generate new tax revenue (Fulton & Shigley, 2005). There may also be proposed developments just outside but contiguous to city limits (within SOI) and a city may deem it necessary to provide city services such as fire, police, water and sewer, etc. Because the financial impact of annexations and incorporations can affect an entire county, cities are not able to simply claim and annex land. The decision to incorporate and annex is made by the Local Agency Formation Commission, or LAFCO, which is made up of local elected officials. Specifically, LAFCO boards generally contain two county supervisors, two representatives of the county's cities, and may also include two representatives of special districts within the county, and one member of the public. In Fresno County however, LAFCO does not include special district representatives. The make up of the Commission is intended to provide an unbiased foundation for decision making.

Annexation and the accompanying development can impact the environment from the construction of roads and infrastructure, and city services (refer to Chapter V, Section H, Public Utilities, of this MEIR). Annexation and the creation of new service areas can have growth

inducing impacts as well, driving new growth in areas that might not otherwise experience it (refer to Chapter VII, Growth Inducing Impacts, of this MEIR).

d. Existing and Proposed Land Uses and Designations

Figure III-3 contained in the Project Description of this MEIR shows the proposed land uses within the city limits, SOI, and AOI. Proposed land uses are also shown outside the city limits in areas anticipated to be annexed into the city by the year 2025. The proposed General Plan's proposed land use designations for the city of Coalinga are listed in Table V.F.-4. The current city limits cover 4,541 acres (refer to Table V.F.-3). This area contains 1,056.5 acres of residential area. Table V.F.-4 shows the allowable densities of the residential zones, and the maximum build out potential under the increases of the proposed General Plan. Table V.F.-5 shows allowable densities of non-residential zoning designations, while Table V.F.-6 shows the changes projected in the proposed General Plan.

The current SOI, a legally defined area established by the Fresno County LAFCO that is used to designate the future incorporated area and service boundaries of the city, is smaller in total area than the proposed city limits (Figure III-3, Land Use Map, contained in Chapter III of this MEIR). The proposed General Plan proposes to expand the SOI from 2,288 acres to 6,271 acres. This expansion reflects the expected land requirements to meet the housing and commercial needs of the next 25 years provided that the growth rate remains as high as it has for the past ten years.

TABLE V.F.-3
Planning Boundaries (Acres)

Boundary	Current	Proposed	% Increase
City Limits	4,541	4,541	0
Sphere of Influence (Current)	2,288	7,892	345
Total (Planning Area)	6,829	11,724	172
Area of Interest	11,581	41,146	355
TOTAL	18,410	53,579	291

Source: PMC; City of Coalinga General Plan Update, 2005-2025

1) Residential Land Use Designations

This section provides a description of each of the official residential land use designations. A range of residential land use densities is provided for in order to accommodate a variety of lifestyles.

(a) Ranchette Residential (RCH)

This designation applies to large lot developments with a minimum parcel size of ten acres. This designation is intended primarily for the area north of the developed portions of the community, along Highways 198/33. Once the areas have been annexed, they will be served by City water,

but not the sewer system. Equestrian oriented developments with public linkages to regional trails system are strongly encouraged in this designation.

(b) Residential Estate (RE)

This zoning classification applies to large-lot developments with two dwelling units per acre or less. This designation applies to areas to the east and south of developed portions of the community. Equestrian oriented developments with public linkages to regional trails system are strongly encouraged in this designation. Additionally, clustering of new development is encouraged in order to preserve natural features and provide community amenities, such as parks and trails.

(c) Residential Single Family (RSF)

This designation applies to single-family detached housing units that require a full range of urban services and public improvements. Clustering techniques are encouraged to ensure development on large parcels, and should be located in areas with minimal environmental constraints. The development density is from 2.1 to 5.0 dwelling units per acre.

(d) Residential Medium Density (RMD)

This designation applies to high density, single-family homes on small lot subdivisions and a variety of attached homes designed to meet the needs of "workforce housing". Density should be between 5.1 and 15 dwelling units per acre, although density bonuses may be used in this zoning to reduce housing costs and increase density. Developments should include common amenities, such as pools, trails, and parks.

(e) Residential High Density (RHD)

This designation allows multifamily structures, such as condominiums and apartments. Low and moderate income housing is an appropriate use for this designation, and density bonuses may be obtained to reduce housing costs. Common amenities should be included as part of new developments in this zone, such as pools, landscaping, and tot lots.

(f) Mixed Use (MX)

This designation encourages a mix of residential and commercial uses. Commercial uses should be primarily retail or office in nature. The designation typically applies to urbanized portions of the community and is focused towards infill and reuse projects. All uses allowed in the CG (General Commercial) and CS (Service Commercial) designations are allowed in the MX area. Exclusive residential development and mixed residential/commercial development are subject to the PD (Planned Development Overlay) requirements. Residential uses on a given parcel must not exceed 15.0 dwelling units/gross acre as described under the RMD General Plan designation.

2) Commercial Designations

This section provides a description of each of the official commercial land use designations, which also must obtain the full range of urban services.

(a) Commercial General (CG)

The Commercial General land use category is used to indicate areas of concentrated retail use, generally located adjacent to major streets. In addition, the CG designation is also applied to other retail uses, and may contain food, drug, and clothing stores, and services such as small restaurants, laundry outlets, etc. Hotels, motels, medical, and professional offices are permitted in CG areas, subject to zoning regulations.

(b) Commercial Service (CS)

This designation allows for a full range of retail and service uses for which a shopper usually makes a single-purpose trip to visit one establishment. Such uses include repair facilities, building materials and industrial supplies, and auto and accessories dealers. In addition, light manufacturing/distributing uses, which include wholesale and/or retail outlets, are included in this category.

3) Other Designations

This section provides a description of each of the remaining land use designations.

(a) Manufacturing/Business (MB)

Both large and small-scale businesses that are involved in light manufacturing, distribution, or services are covered by designation. City zoning regulations distinguish between light and heavy manufacturing uses covered within this single category. Office/manufacturing "condominiums" and wholesale-to-the-public outlets are encouraged in MB designated areas.

(b) Public Facilities (PF)

This designation includes City, County, and other governmental and agency owned properties, such as the Civic Center, prisons, public schools, water tanks, airport, sewer treatment plant, detention/retention facilities, and fire stations. Public Facilities may also include public utilities rights-of-way.

(c) Recreation Facilities (RC)

This designation applies to public and private recreation facilities, including public parks, golf courses, and equestrian centers.

(d) Open Space/Conservation (O)

Properties with significant physical constraints to development are included in this classification. These properties are subject to one or more of the following conditions:

- Location within a designated floodway.
- Contains a fault rupture hazard area.
- Contains unstable geologic or soils conditions.
- Exposes people to hazardous materials.
- Near significant wildlife corridors or habitat areas.

No residential or commercial uses, except equestrian boarding and training and limited agricultural use, are allowed within this classification. Sand and gravel extraction, as a temporary use, may be allowed as determined by city zoning procedures. Passive recreational uses (e.g. bicycle and hiking trails) may be allowed as determined under city zoning procedures.

(e) Agriculture (AG)

This designation is designed for intensive agriculture and related uses. A minimum lot size is not provided, but only one home per twenty gross acres is allowed.

4) Overlay Designations and Special Planning Areas

In recognition of the fact that certain locations require special consideration, the following designations have been created to provide further direction for the development of these areas. Lands within these special planning areas must conform to the requirements of both the underlying zoning as well as those of the overlay designation.

(a) Master Plan Area Overlay

This Overlay Designation is applied to large (twenty acres or more) vacant parcels primarily located outside of the historical core of the community. Any development in these areas is required to be planned through the Specific Plan or Planned Development Combining Designation (P-D) processes. Land use designations have been approximated in these areas. Within these areas, urban development is expected to expand during the twenty-year planning period. Specific development intensities are defined for each Master Plan Area.

(b) Downtown Mixed Use Overlay

The Downtown area is contained within the square shaped area created by Van Ness Street to the North, Polk Street to the South, Sunset Street to the West, and Hayes Street to the East, and is bisected by Highway 33. This is considered the historic commercial core of the city, and contains a mix of retail, service, office, and government uses. The Mixed Use Overlay is intended to preserve the character of this area by requiring individualized development parameters that encourage continued vitality and economic strength without losing the walkability or historic feel of the Downtown.

(c) Gateway Overlay

The northern and southern entrances to the city serve as “gateways” and should be aesthetically pleasing and welcoming. This overlay requires that attractive signage, monuments, landscaping, and well designed buildings that reinforce Coalinga’s history and community character are included in developments in these areas.

(d) Agricultural Conservation Overlay

This designation applies specifically to the land north of the proposed wastewater treatment site, and is meant to discourage urban development in this area.

(e) Flood Hazard Overlay

This Overlay Designation is applied to land within the flood way and 100-year flood plain areas of Los Gatos, Warthan and Jacalitos Creeks. Land within the Flood Hazard Overlay is generally designated as Open Space. This overlay designation is an indicator of development constraints, and land inside of the floodplain is subject to the City Floodplain Management Ordinance. When structures or other improvements are proposed within the Flood Hazard Overlay, technical studies will need to be done to determine the location and elevation of the flood way and the flood plain. Improvements will be severely restricted within the flood ways. Improvements may be allowed with restrictions in the flood plain, but development should be limited to multi use trails and other passive recreation uses.

(f) Resource Extraction Overlay

This overlay designation is applied to land currently used for oil production and quarrying. Urban development should be limited to compatible industrial uses; residential uses are highly discouraged.

TABLE V.F.-4
Maximum Residential Buildout Potential in Dwelling Units (DU) per Acre

Land Use	DU's[1]	City Limits			Future Growth Area (SOI)			TOTAL		
		Acres	DU's	Pop.	Acres	DU's	Pop.	Acres	DU's	Pop.
Residential Ranchette (RR)	0.1	0	0	0	523	52	156	523	52	156
Residential Estate (RE)	2.0	30	60	180	464	928	2,784	494	988	2,964
Residential Single Family (RSF)	5.0	681	3,405	10,215	2,393	11,960	35,880	3,074	15,365	46,095
Residential Medium Density (RMD)	15.0	171	2,565	7,695	168	2,520	7,560	339	5,085	15,255
Residential High Density (RHD)	25.0	168	4,200	12,600	31	775	2,325	199	4,975	14,925
Mixed Use	15.0	41	615	1,845	0	0	0	41	615	1,845
TOTAL	N/A	1,091	10,845	32,535	3,579	16,235	48,705	4,670	27,080	81,240

Source: PMC, Land Use Diagram GIS layer (land_use_diagram.shp) 2008

TABLE V.F.-5
Non-Residential Maximum Buildout Potential (No Overlay Designation)

Land Use	City Limits		Future Growth Area (SOI)		TOTAL	
	Acres	Employees[1]	Acres*	Employees[1]	Acres	Employees[1]
CG	96	384	70	280	166	664
CS	99	396	89	356	188	752
MB	299	1,196	1,375	5,500	1,674	6,696
PF	1,894	7,576	456	1,824	2,350	9,400
REC	145	0	660	0	805	0
OS	286	0	958	0	1,244	0
AG	95	49.4	243	126.36	338	175.76
TOTAL	2,914	9,601.4	3,851	8,086.36	6,765	17,687.76

[1]Assumes 4.0 employees per acre of land for CG,CS, MB, PF, 0 employees per acre for REC and OS, and 0.52 .
2. 4.0 employees per acre is based on Fresno Council of Governments information used in the traffic modeling conducted in 2005.

Source: PMC, Existing Land Use Map (pmc_2006_lu_map_sp27_4.shp) March 2008

TABLE V.F.-6
Land Use Changes within Planning Area

Land Use Designation	1994 GP*		2025 GP Update**		Acreage Increase (Decrease)	% Change
	Acres	%	Acres	%		
RR	n/a	n/a	522.48	4.20%	522.48	100%
RE	*208.26*	*3.05%*	*495.46*	3.99%	287.47	*138%*
RSF	*1,416.31*	*20.74%*	*3,073.69*	24.72%	*1,657.38*	*117%*
RMD (Low density RML)	130.44	1.91%	0.00	0.00%	*-130.44*	-100%
RMD (Medium Density RML)	*117.36*	*1.72%*	338.62	2.72%	*221.26*	*189%*
RHD	n/a	n/a	*199.34*	1.60%	*199.34*	100%
MX	*55.26*	*0.81%*	41.14	0.33%	*-14.12*	*-26%*
CG	*87.83*	*1.29%*	*166.4*	1.34%	*78.57*	*89%*
CS	*26.61*	*0.39%*	*187.98*	1.51%	*161.37*	*606%*
MB	*134.29*	*1.97%*	1,674.04	13.47%	*1,539.75*	*1,147%*
PF	*1,435.37*	*21.02%*	2,350.67	18.91%	*915.32*	*64%*
REC	*192.81*	*2.82%*	*804.18*	6.47%	*611.37*	*317%*
OS	*1,255.21*	*18.38%*	*1,244.25*	10.01%	*-10.96*	-1%
AG	*1,274.99*	*18.67%*	337.95	2.72%	*-937.04*	*-73%*
Subtotal	*6,334.74*	*92.80%*	*11,436.22*	*87.79%*	*5,101.48*	---
Street right of ways etc (est.)	*494.48*	7.20%	*996.50*	8.01%	*501.72*	*102%*
PLANNING AREA TOTAL	*6,829.22*	*100%*	*12,432.72*	*95.80%*	*5,603.20*	---

** Source: PMC, Existing Land Use Map GIS layer (1994_exisiting_gp_sp27_4.shp) March 2008*
*** Source: PMC, Land Use Diagram GIS layer (land_use_diagram.shp) March 2008*

2. Regulatory Setting

The proposed General Plan constitutes a comprehensive land use plan for areas under the jurisdiction of the City of Coalinga and considers development in areas adjacent to the city under the jurisdiction of the County of Fresno. The Proposed General Plan does not propose to change the land use for areas outside of City jurisdiction, although the desired Sphere of Influence has been substantially expanded in this Proposed General Plan. In order to annex lands within the SOI into the city, Coalinga must receive approval from the LAFCO, as described in the preceding section.

3. Thresholds of Significance

The significance of impacts on land use was determined by applying criteria listed in Appendix G of the CEQA *Guidelines*. For the purpose of this MEIR, a project will have a significant effect on the environment if it would:

a. Physically divide an established community;

b. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect; or,

c. Conflict with any applicable habitat conservation plan or natural community conservation plan.

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

e. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere.

f. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere.

4. Impact Assessment and Methodology

The analysis of land use and housing impacts was conducted qualitatively. The potential impacts resulting from implementation of the Proposed General Plan were analyzed against the proposed policies whose purpose it is to remedy the impacts.

5. Impacts Discussion and Proposed Mitigation Measures

LUPH Impact 1 Premature construction of housing could lead to accelerated and substantial population growth, with possible impacts to town character, cohesiveness, and public services.

The proposed General Plan is predicated on continued growth within the city limits and in the SOI. A number of population projections have been prepared for the City. The proposed General Plan assumes that growth could exceed the historic rate as well as the Department of Finance growth projections outlined in table V.F.-1. This assumption is based on the fact that a number of housing developments are currently proposed (refer to Table V.F.-2) that would provide 12,984 housing units for an additional population of 38,670 new residents (excluding group quarters), assuming the current occupancy rate of 3.0 people per household. To account for additional growth both independent of, and in support of the currently proposed developments, the proposed General Plan estimates an additional 5,486 person increase in population resulting in a total General Plan buildout population objective of 55,373 in 2025. Please refer to Table III-2 that outlines the projected population growth during the tenure of the proposed General Plan given the proposed buildout population objective. Although the population objective outlined by the proposed General Plan exceeds historic growth rates, and the Department of Finance estimated growth, it is still well below Coalinga's maximum residential buildout potential of 81,240 as outlined in Table 2-9 of the proposed General Plan.

Proposed residential developments would provide 12,984 new dwelling units, enough to house over 38,000 *new* residents. Of these, 1,880 of the proposed units are inside the city limits, with the remaining 11,104 dwelling units located outside of the existing boundary (refer to Table V.F.-2). If all of the housing projects that are currently proposed are built and occupied, the total population could exceed 55,000 people excluding group quarters at buildout, over 30,000 people more than is projected by the Department of Finance.

Mitigation Measures in the proposed General Plan

A number of policies and their implementation measures have been included in the proposed General Plan to mitigate the impacts associated with the expected growth of the next twenty years, including the following:

LU 1-1 The City shall encourage proposals that preserve and enhance the open, rural small town character and neighborhood quality that makes Coalinga a special place. Associated Implementation Measures include LU1-1.1 to LU1-1.10.

This policy is accompanied by a number of implementation measures that attempt to control growth in areas with recognized scenic vistas (Scenic Resource Zones) in order to preserve the sense of open space, provide panoramic view sheds, set standards for signs and their locations, and provide for public art. Additional policies seek to preserve the character and functionality of the city, increase density within city limits while preserving the rural feel of the town, its surrounding open space, and encourage mixed use developments on empty parcels within the existing city limits. These policies should help to preserve the compactness, character, and cohesiveness of the city, and encourage development that does not contribute to sprawl, the premature conversion of open land, or annexation of areas within the SOI.

LU 1-5 Encourage consistent and comprehensive planning for the city. Associated Implementation Measures include LU1-5.1 to LU1-5.9.

This policy is accompanied by eight implementation measures that direct the city to regularly update the Land Use Diagram to provide accurate illustrations of the current conditions in the city using GIS technology, maintain an updated zoning code that shows overlay zones and special planning areas, and use this information to ensure that there is an adequate mix of commercial and residential uses. Additional measures provide timelines for establishing overlay zones and Master Planned areas, requiring new developments to be contiguous to existing development in order to prevent "leapfrog" development, and ensuring that new proposals meet federal, state, and local regulations, as well as ensuring that impacts are mitigated. The implementation measures and the associated policy will allow for orderly growth and effective planning.

Residual Impact
The policies of the proposed General Plan and the above mitigation measures will lessen these impacts to *less than significant.*

LUPH Impact 2 Commercial growth could be outpaced by residential development, resulting in more residents commuting long distances, leading to subsequent impacts to air quality and traffic.

Population growth, based on the Department of Finance projections, would contribute 10,971 persons to the population from 2005 to 2025 (refer to Table V.F.-1). With the additional 5,486 persons expected as support for this level of growth, the total addition to the population could be 16,457 people. Based on the 2008 DOF estimated population of 12,185, this addition would result in a total population of 28,642. Proposed housing developments, shown in Table V.F.-2, would provide enough dwelling units to house over 38,000 residents.

Under current zoning and land area allocations, including future growth areas, there is only enough land allocated within the city limits and the SOI to provide employment for 27,060 people (refer to Table V.F.-5) including general and service commercial, manufacturing, agriculture, and public employees. The amount of land proposed for commercial areas within the city limits will not provide enough employment for any of the expected level of growth outlined above, based on a level of 4.0 employees per acre used in the Proposed General Plan.

However, if using the proposed General Plan development projections, the number of dwelling units under the revised SOI and AOI would substantially increase to a total of 27,089 dwelling units and a population of 81,268. This housing allocation far exceeds commercial availability (refer to Tables V.F.-4 and V.F.-5), which could result in residents commuting to work in other cities. This will increase traffic impacts, and have associated air quality impacts. Higher levels of commercially zoned property should be allocated to help maintain a jobs/housing ratio with the residential development proposed under the General Plan.

Mitigation Measures in the proposed General Plan
Policies and Implementation Measures that reduce impacts to a less than significant level have been included in the proposed General Plan and are listed as follows:

LU 1-2 Retain and expand diversified business opportunities that are compatible with the environment, community values and community vision of the city. Associated Implementation Measures include LU1-2.1 and LU1-2.2.

This policy promotes active engagement with both existing businesses as well as those seeking a new location or expanded customer base. This kind of outreach will help to keep the issue of commercial build out in the forefront of issues confronting civic leaders. The accompanying implementation measures call for the creation of a business visitation program, which would actively recruit new business while engaging existing business owners to assess their needs. The measures also call for the City to pursue state, federal, and private grants in order to provide low interest loan assistance to business's "whose operations are consistent with the community vision of the city," which should encourage existing and potential local business owners to stay in Coalinga and create a more vibrant business environment.

LU 1-3 Attract new businesses to the city that are compatible with the community vision and improve the balance among commercial, professional office, and industrial businesses so that the needs of Coalinga residents is provided for without compromising the community character. Associated Implementation Measures include LU1-3.1 to LU1-3.7.

The implementation measures associated with this policy call for the city to develop specific goals for attracting businesses over the next 20 years, with specific milestones identified at five year increments. Other measures include developing marketing materials for distribution to businesses and developers to encourage them to come to Coalinga, and sending representatives of the city to trade fairs to further promote the city as a place to do business. The last three implementation measures are focused on creating a regional commercial and business park. Specifically, the measures call for funding targets, the creation of a development strategy that encourages retail businesses to relocate, and to amend the Zoning Ordinance to allow for major offices and larger facilities.

LU1-5 Encourage consistent and comprehensive planning for the city. Associated Implementation Measures include LU1-5.1 to LU1-5.9.

The mitigation measures associated with this policy direct the city to establish a schedule for updating the Land Use Diagram, ensuring that the current version of the Diagram is an "…accurate and appropriate illustration of the city's land uses" using contemporary GIS technology, and developing Mixed Use Overlay design guidelines, as discussed in LU Impact 1, above (LU1-5).

Goal LU6 Maintain adequate, appropriately located land for the development of high quality manufacturing and business to maintain a job/housing balance

throughout the city. Associated Policies include LU6-1 to LU6-3, and all Associated Implementation Measures.

The Goal and its associated policies and implementation measures are focused, for the most part, on the location of heavy industry and resource extraction oriented businesses. However, the first implementation measure, Implementation Measure LU6-1.1, specifically addresses the need to maintain a "job housing balance in the city," presumably including those areas adjacent to the city limits. Periodic review of the Land Use Diagram, as discussed in LU1-5, should help to identify imbalances between the number of jobs and the amount of housing.

Residual Impact
The policies of the proposed General Plan and the above mitigation measures will lessen these impacts to *less than significant.*

6. Cumulative Impacts

Potential cumulative land use impacts will be avoided or minimized by implementation of the Goals, Policies, and Implementation Measures listed in the Land Use Element of the proposed General Plan Cumulative impacts related to other impact areas (e.g., biological resources, air quality, etc.) are analyzed and discussed in the following sections of this MEIR.

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G. PUBLIC SERVICES

This section of the MEIR addresses potential impacts resulting from implementation of the proposed General Plan on public services.

1. Environmental Setting

a. Fire Protection

The city of Coalinga is susceptible to both urban and wildland fire hazards. Fires occurring in the urban area have the potential to destroy property and structures, and cause injury or loss of life. Urban land uses with inappropriate or outdated building materials and the native landscape that surround Coalinga are potential fire hazards. According to the Coalinga Fire Department, housing units constructed with wood shake roofs or wood siding present potential fire hazards. However, many of the older buildings were destroyed in the 1983 earthquake and have been rebuilt to newer fire codes that have improved the fire safety of these rebuilt structures. Fire prevention standards for new development in the city follow those prescribed in the Uniform Building Code. Development in accordance with these required standards will reduce the potential damage from fire.

Wildland fires also pose potential hazards in the hilly areas where chaparral and other vegetation is present. Wildland fires can destroy large tracts of land as well as structures. The City Council has adopted a weed abatement program to reduce property damage from wildland fires.

Fire protection is provided by the City of Coalinga Fire Department located at 300 West Elm Avenue. The department consists of fifteen full time personnel and is supplemented by a paid-call (volunteer) force of about six (Personal Communication, Captain B. Long, February 7, 2007). The Fire Department currently has three engines and one support apparatus. The City's general fund supports all services of the department. All portions of the city are within three miles of the fire station; however, due to the expansion of the city, response times of up to six minutes are not uncommon. The department also operates and maintains three ambulances, which have a service area of over 1,000 square miles. The primary ambulance is staffed full time by an Advanced Life Support (ALS) crew and the second ambulance can be staffed at either an ALS or Basic Life Support (BLS) level. The City receives monthly revenue for the ambulance service from the Fresno County Health Department and the Coalinga Hospital District.

A new fire station is planned for construction, beginning in the next 18 months, which will require 12 new firefighters and equipment to be purchased. The new station should lower response times to between three and four minutes to any location within the city limits.

The City has "mutual aid" and "instant aid" agreements with the Fresno County Fire Protection District (FCFPD). Under the instant aid agreement, FCFPD automatically responds to critical facility fires in Coalinga. Critical facilities (i.e., those facilities which are occupied) in the city include schools, convalescent homes, prisons and the hospital. In return, the Coalinga Fire Department responds to any fire within one half mile of the city's incorporated boundary. Under the mutual aid agreement, FCFPD and the Pleasant Valley State Prison (PVSP) Fire Department

will respond (when available) when requested. The City will also provide an engine crew to assist the Office of Emergency Services (OES) when requested.

The City provides water for fire fighting in three major tanks, one at Palmer Ave, another at Derrick Ave, and the last at Calaveras Avenue, south of Palmer Avenue. The combined capacity of these tanks is more than fifteen million gallons.

In a single family residential area, a fire flow of 1,500 gpm at a twenty pound per square inch (psi) residual pressure is commonly applied. Fire flow requirements in nonresidential areas vary at each location according to construction material, square footage, number of stories, and building usage. The "basic fire flow," as defined by International Standards Organization for Coalinga is 1,500 gpm for a duration of two hours (PMC General Plan Update). A basic fire flow of 2,500 gpm can be maintained for two hours at any time during a period of three days with consumption at the maximum rate.

According to the International City/County Management Association, a ratio of one firefighter for every 1,000 population is an acceptable standard. However, this number may need to be adjusted significantly depending on geographic considerations which can increase response times and climate or other factors that affect fire frequency and strength. Currently the City of Coalinga has one full time firefighter per every 748 residents.

b. Police Protection

The Coalinga Police Department is responsible for the enforcement of all Federal and State statutes, as well as local Municipal Codes within its city limits. The Department station is located in the city center at 270 N. Sixth Street. The station was completed and operational in late 1994. The Police Department's patrol and communications activities are staffed 24 hours a day, seven days a week. The communications section serves as a dedicated public safety answering point (PSAP) for police and fire services within the City's jurisdiction. The Department is staffed with twenty full time sworn personnel, from Chief to Officer, six public safety dispatchers and various civilian staff (Personal Communication, Office of the Chief of Police, February 7, 2007). The civilian staff serves in the animal control and records divisions. The Federal Bureau of Investigation suggests a planning standard officer to resident ratio of two officers for every 1000 residents (Glendale, 2003). The city of Coalinga's current ratio is one officer for every 561 (approximately 2/1,000) residents, approximately in conformance with that standard. It should be noted that the appropriate officer to population ratio can vary significantly based on socioeconomic and geographic factors.

The city's Police Department maintains a number of mutual aid/operational agreements, which include partnerships with the Fresno County Sheriff's Department for service in the immediate unincorporated areas. Similar agreements exist with the recently annexed Pleasant Valley State Prison. The Department is a joint partner with various non-profit victim advocacy groups whose teams work to reach out to victims of crime, especially those of domestic violence.

c. Schools

The Coalinga-Huron Unified School District (District) serves students living in Coalinga, Huron and portions of Fresno County and Monterey County. The District covers approximately 1,100

square miles, and has been a growth District in the San Joaquin Valley. However, in the last year, the School District has lost 63 students (Personal Communication, B. Baker CHUSD Business Manager, February 8, 2007).

At the present time, the elementary school facility in Huron serves students in grades K-6, while the Coalinga area elementary schools serve students at various grade levels, in the following school facilities: Bishop, Cheney, Dawson, and Sunset Elementary Schools.

Coalinga Middle School students, grades 7-8, currently attend in facilities which are required to share instructional spaces and core facilities with Coalinga High School, grades 9-12. All District students in grades 7-12 attend Coalinga Middle, Coalinga High, Cambridge Continuation, or Huron Continuation High School. Plans for a new high school are currently being finalized, with plans to begin construction in the spring of 2007 (Personal Communication, B. Baker CHUSD Business Manager, February 8, 2007). Enrollment for all schools is shown in Table V.G.-1.

TABLE V.G.-1
Coalinga-Huron Unified School District 2005-2006 Enrollment

School	Enrollment
Annie E. Cheney Kindergarten	161
Henry F. Bishop Elementary	273
Nell Dawson Elementary	461
Sunset Elementary	413
Coalinga Middle School	663
Cambridge Continuation High School	31
Community Day	14
Coalinga High School	1,210
Coalinga Total	3,226
District Total	4,413

Source: California Department of Education (2006)

The District has experienced steady growth in enrollments during the past five years. This growth is expected to increase over the next ten years to a growth rate of approximately four+ percent per year. The growth is projected to result from:

- Pending and planned residential developments in the cities of Coalinga and Huron and in the unincorporated areas;
- Build out of a new Industrial Park in the city of Coalinga;
- Proposed annexations to the city of Coalinga; and,
- Construction of hospital and medical facilities, and the opening of the State prison facility in the Pleasant Valley area.

As set forth in the District's Five-Year Facilities Plan, to provide school facilities to house projected student enrollments, the District needs to:

- Construct at least one new elementary facility in the eastern area of the city of Coalinga;
- Consider to either permanently house all future middle school students at the existing facilities or consider other alternative sites for the construction of the new middle school facilities; and,
- Refurbish existing facilities.

The District relies on statutory developer fees to provide approximately one-third of the construction costs for new or upgraded school facilities. State financing may provide another 50 percent, but only if future statewide bond financing is approved by the electorate. The city plans on applying to the State for Financial Hardship status in order to complete the high school construction, which would provide State assistance to cover the city's share of construction costs (Personal Communication, B. Baker CHUSD Business Manager, February 8, 2007).

d. Recreational Facilities

There are two developed parks within the city of Coalinga, Keck Park and Olsen Park, both of which are managed by the Coalinga-Huron Recreation and Parks District (CHRPD). Keck Park is a 15 acre park that includes the Coalinga Community Center, and is located on Jayne Avenue on the western edge of the city. Olsen Park is a ten acre park located on the eastern side of the commercial core, and includes a baseball diamond and open use fields. School facilities are also available to the public on weekends and times when school is not in session.

In 1983, the National Recreation and Park Association (NRPA) developed "standards for parks" that could be used by local agencies in determining how much park space was necessary for their population. These standards were meant only to provide preliminary guidance, and the NRPA encourages each community to develop their own standards (County of San Luis Obispo, 2006). The proposed General Plan suggests that the City of Coalinga provide 2.5 acres of park space for every 1,000 residents. There are currently two parks in the city, Keck Park (15 acres), and Olsen Park (ten acres). As a result, the City currently provides approximately 2.2 acres of park space per 1000 residents.

e. Solid Waste Disposal

The Coalinga Disposal Site, which is operated by the County of Fresno, is located one mile south of the city of Coalinga off of Highway 198. This landfill serves the Cities of Coalinga and Huron, and the rural areas of southwestern Fresno County. Currently the Coalinga Disposal Site averages 50 tons per day with a maximum daily permitted capacity of 100 tons per day (New Mental Health Treatment Facility DEIR). The landfill is expected to serve the Coalinga region for the next 35 to 40 years. Once the landfill has reached capacity, local solid waste will be taken to the regional county landfill on American Avenue, approximately 45 miles east of the city of Coalinga. This landfill is presently expanding to 440 acres to accommodate regional growth.

The City of Coalinga contracts with Mid Valley Disposal to provide solid and green waste collection and disposal services, as well as recycling service, within the city limits. Mid Valley Disposal also provides collection for appliances ("white waste") and electronics, such as computers and monitors ("e-waste"). Rural residents outside the city limits in the SOI and AOI are responsible for their own solid waste services. Currently the city averages 16 tons per day, excluding solid waste generated by the Pleasant Valley State Prison. The Prison averages six tons per day.

Household hazardous waste (HHW) is managed by the County of Fresno. HHW includes used batteries, automotive lubricants, household cleaners, paint, fertilizers, and pesticides. Any product containing corrosive, toxic, ignitable, or reactive ingredients is considered to be household hazardous waste by the U.S. EPA. Improper disposal methods include pouring liquids into storm drains or onto the ground, or in some cases putting them out with the trash. Currently, the County holds a collection day twice per year in different cities around the county. Cities are chosen as drop off points based on their convenience and central location. The location changes with each collection event, but one city is always on the east side of the county, and the other on the west. Additional collections are held twice a year at the Fresno Yosemite Airport. The County and Mid Valley Disposal are working on developing a year round facility to accept HHW from around the county (Personal Communication, Mid Valley Disposal, January 9, 2007).

2. Regulatory Setting

a. Fire Hazards

Government Code §51178 specifies that the Director of California Department of Forestry and Fire Protection (CDF) shall identify areas in the state as very high fire hazard severity zones based on consistent statewide criteria and based on the severity of fire hazard that is expected to prevail in those areas. Fire hazard severity zones are based on fuel loading, slope, fire weather, and other relevant factors. CDF fire hazard areas were identified with information provided by the Forest and Range Assessment Program (FRAP), which was developed to assess the conditions and threats to the State's forest and range land. The Coalinga area is located within a high fire severity and risk area, as classified by the FRAP program.

b. Energy Services

California state law regulates the location of underground utilities to prevent adverse impacts during construction activities. California Government Code Sections 4216-4216.9 require identification of underground utility lines prior to construction activities and provides sanctions for not complying with the law. Among the requirements mandated by law include participation in a regional notification center (e.g., Underground Service Alert – U.S.A.; "Call Before You Dig" programs) that can provide utilities location marking and information to parties engaging in construction activities involving excavation.

New construction is required to meet the energy efficiency standards established by the California Energy Commission. Title 24, Chapter 6 of the California Building Code of Regulations was enacted in 1978 to reduce the State's energy consumption (California Energy Commission). These standards were updated in 2001 and again in 2005 to comply with the

requirements of AB 970 (2000) and AB 5X (2001) which updated the energy efficiency standards for new construction and outdoor lighting, respectively. Other major goals of the updated Standards were to respond to the energy crisis by reducing power bills and improve the state's economy, reduce energy consumption at peak usage periods, and provide market incentives for the incorporation of new technologies. All new construction must comply with the Standards, which went into effect on October 1, 2001. Newly updated standards will be released in 2008.

c. Solid Waste Disposal

Solid waste disposal is regulated at the State level in Title 14, Chapter 3 of the Natural Resources Code and in sections 40100-42100 and 43200- 43222 of the Public Resources Code. AB 939, enacted in 1989, requires municipalities to recycle fifty percent of their 1989 waste level to lessen the pressure on landfills. Recycling and solid waste services are provided by Mid-Valley Disposal, who, under contract with the City, provide recycling, green waste, and garbage pick up to residents on a weekly basis.

3. Thresholds of Significance

Appendix G of the CEQA *Guidelines* provides the following thresholds for determining significance with respect to Public Services:

a. Impacts to fire protection, police services, and schools are considered significant if a project would result in substantial adverse effects from construction of new or physically altered governmental facilities, or need for new or physically altered governmental facilities, the construction of which could cause significant impacts, in order to maintain acceptable service ratios, response times, or other performance objectives.

b. Impacts to solid waste are considered significant if the amount of solid waste generated would deplete landfill capacity such that new disposal areas would have to be constructed that may have a significant effect on the environment, or would result in non compliance with federal, state, and local statutes and regulations related to solid waste.

4. Impact Assessment and Methodology

Impacts to public services are assessed based on the general assumption that as the population of the city of Coalinga increases, additional services will be required to keep up with growth. Table V.G.-1 shows the existing and future Public Services needs of the city of Coalinga, based on national or local standards, as applicable. The Existing Rate is based on the current population of approximately 11,200. Future need is based on a proposed General Plan buildout population of 55,373.

The proposed General Plan includes planned residential land uses to accommodate an additional 10,845 dwelling units within the existing city limits and 16,235 within the Future Growth Area (SOI) totaling an additional 27,080 dwelling units. However the Land Use Element of the proposed General Plan estimates buildout of the proposed General Plan based on buildout of

reasonably foreseeable development projects plus estimated additional annual growth resulting in the construction of approximately 14,719 additional dwelling units by the year 2025.Given the current rate of 1.2 students per household, the total number of students by school type is also included in Table V.G.-1, along with an estimate of the number of additional schools that would be needed at ultimate buildout of the community.

TABLE V.G.-2
Public Services - Existing Conditions and Future Needs

Service	Standard	Existing Rate	Year 2025 Add'l Needs
Fire Protection	1:1000*	1:748	44 firefighters
Police Protection	2:1000**	2:1000	88 officers
Park Space	2.5:1000***	2.2 acres:1000	149 acres
Schools-Elementary	Average 9.6 acres; 600 students per school****	0.49/du +	7,212 students 12 schools 149 acres
Schools-Middle School	Average 1.9 acres; 1,000 students per school****	0.25/du++	7,212 students 3-4 schools 5.7-7.6 acres
Schools-High School	Average 44.5 acres; 1,800students per school****	.46/du+++	6,771 students 3-4 high schools 133.5-178 acres

**International City/County Association Standard*
***Federal Bureau of Investigation Recommendation*
****Proposed General Plan Policy PFS6-1*
*****Ave. Students per school and acreages from www.cde.ca.gov/ls/fa/sf/facts.asp*

5. Impacts Discussion and Proposed Mitigation Measures

a. Fire Protection

PS Impact 1 Implementation of the proposed General Plan will require an increase in personnel, facilities, and resident education in order to continue to provide adequate fire protection.

In order to maintain adequate fire protection and services for additional projected development in the proposed General Plan, the City must increase its level of protection in the planning area. Fire Department needs, determined on a project by project basis, consider historic activity of similar uses. The specific type and phasing of new developments is undetermined at this time, but will require additional manpower, training and equipment. To maintain a similar firefighter to resident ratio as currently exists, the Fire Department will be required to hire an additional 44 firefighters. With regular and timely service upgrades, new development that is consistent with the proposed General Plan will not exceed levels of protection required to serve such development.

In addition to concerns about adequate water flows for fire protection, the expansion of the SOI into areas that are currently undeveloped will increase the urban/ wildland interface, the area where developed areas meet undeveloped forest and range land. There are a variety of fire protection and management issues that are unique to these areas. These include the proximity of major fuel sources to residential buildings, the interaction of wild land fire and structural characteristics (such as eaves, unscreened windows, decks, or a home's proximity to slopes), as well as the flammability and proximity of landscaping elements to the structures. Development in these areas should be accompanied by landscaping restrictions and building guidelines to reduce the risk to property and improve the efficacy of other fire protection efforts.

The expected growth in the next 20 years will require that the Fire Department periodically updates their plans, equipment, and training, while ensuring adequate personnel and modern facilities to meet the needs of the expanding population and city. Residents should be educated as to what measures they can take on an individual basis to lower their fire risk at their homes and businesses.

Mitigation Measures in the Proposed General Plan
The following policies and their associated implementation measures are included in the proposed General Plan, and would reduce the potentially significant impacts to less than significant levels. These measures require the City to implement a Fire Department Master Plan, require new developments to pay for their fire protection needs; maintain the existing mutual and instant aid agreements with other agencies; and adopt standards of coverage specific to the geography of Coalinga; among other things.

PFS1-1 The City shall plan for adequate facilities, equipment, and personnel to meet fire fighting demands. Associated Implementation Measures include PFS1-1.1 through PFS1-1.7.

S2-5 The City shall ensure new development in high fire risk areas is carefully sited and configured. Associated Implementation Measures include S2-5.1 to S2-5.6.

Residual Impact
With implementation of these policies, impacts would be considered *less than significant.*

b. Law Enforcement Services

PS Impact 2 Implementation of the proposed General Plan will expand the area of coverage for the Coalinga Police Department, potentially increasing response times, potentially decreasing the Resident to Officer ratio, and increasing the need for citizen involvement and education.

Increased population resulting from implementation of the proposed General Plan would increase the demand for police protection services. If buildout is reached by the year 2025 as anticipated in the proposed General Plan, 88 additional officers will need to be hired to maintain the current officer to resident ratio of 2:1000. The City should ensure that funding is available to maintain an adequate police force and promote bilingual citizen education. This could be done

by dedicating developer fees or ensuring general fund allocations. Furthermore, subdivision designs should be reviewed by the Police Department to ensure that there is adequate lighting and that defensible space concepts are included.

Growth will lead to an expanded geographic area of coverage for the Coalinga Police Department, which will need to continue to cooperate with the Fresno County Sheriff's Department to provide adequate service in the fringe areas and in any emergency situation. Citizen education and outreach will continue to be an important part of crime prevention as well, and will require dedicated funding and personnel in order to be effective.

Mitigation Measures in the Proposed General Plan
The following policies and their associated implementation measure have been included in the proposed General Plan, and should reduce the impacts of expected growth to less than significant levels.

PFS2-1 The City shall ensure Coalinga continues to receive adequate police protection. Associated Implementation Measures include PFS2-1.1 to PFS2-1.4.

PFS2-2 The City shall enhance public awareness and participation in crime prevention. Associated Implementation Measures include PFS2-2.1 and PFS2-2.2.

Residual Impact
With implementation of these policies, impacts would be considered *less than significant.*.

c. Schools

PS Impact 3 Implementation of the proposed General Plan will increase the demand for educational facilities.

Increased residential development anticipated in the proposed General Plan should generate sufficient demand for additional schools as indicated in Table V.G.-2; to meet ultimate buildout, there will be a demand for an additional twelve elementary schools, four middle schools and four large high schools. These will be required over time as housing is developed and population increases. The existing rate of students per dwelling unit would vary over time as population characteristics change. However, the estimates given in Table V.G.-2 are good indicators of demand for school facilities.

There are a number of potential funding sources for new school facilities, including state funds, bond measures, and development fees. Decisions between the City and the School District regarding local funding sources have been an intense subject over the past two years. Disputes have arisen in that the School District believes it has not received adequate funding (i.e., school developer fees) to keep pace with new development. As a result, school districts throughout the state have become more aggressive in using the general plan and land use entitlement process as a means of obtaining additional funds for new school construction. Using permit fees and dedication of school sites to provide for new schools is based on the idea that new construction will generate new demand for school facilities. The State Allocation Board sets the amount of

additional funds that can be levied from developers as conditions of approval for their projects. In 2006 and 2007, the limit was set at $.42 per square foot of commercial buildings, and $2.63 per square foot of residential space.

Mitigation Measures in the Proposed General Plan
The growth associated with both existing and proposed projects will increase the number of students within the District. In order to provide a high quality education for all students, ensure adequate funding for construction and operation of new and existing facilities, and provide for appropriate land and siting, the proposed General Plan includes the following policies.

PFS3-1 The City shall provide high quality educational facilities and services that are physically and functionally integrated with their surrounding neighborhoods and the community at large. Associated Implementation Measures include PFS3-1.1 to PFS3-1.5.

PFS4-1 Plan and provide for schools that are integrated into the community. Associated Implementation Measures include PFS4-1.1 to PFS4-1.7.

PFS5-1 Provide adequate land for school sites and school facilities to meet the changing needs of the population. Associated Implementation Measures include PFS5-1.1 to PFS5-1.8.

Residual Impact
With implementation of these policies, impacts would be considered *less than significant*.

d. Recreational Facilities

PS Impact 4 Implementation of the proposed General Plan will increase the demand on existing parks and for new facilities.

The proposed General Plan includes a number of residential developments that will impact the availability of recreational facilities to the residents of Coalinga. Increased densities within the city will stress the existing parks, while new developments on the outskirts will require the construction of new facilities. To meet the standard proposed in the General Plan of 2.5 acres of park space for every 1,000 residents, the city and/or new development will have to dedicate an additional 149 acres of park space. These spaces will have to fill the needs of a wide variety of residents and provide passive and active recreational opportunities.

Mitigation Measures in the Proposed General Plan
In order to mitigate for the impacts to the existing recreational facilities, a number of policies have been included in the proposed General Plan. The adoption and implementation of these policies should reduce the impacts of the expected growth on the recreational facilities of the area.

PFS6-1 Provide and maintain neighborhood and community park facilities, including the sports complex, at a ratio of 2.5 acres to 1,000 residents. Associated Implementation Measures include PFS6-1.1.

PFS6-2 Develop new neighborhood and community parks in new residential neighborhoods as growth occurs. Associated Implementation Measures include PFS6-2.1.

PFS6-3 Provide sufficient playfields to accommodate practice and competitive demands for both organized and informal activity. Associated Implementation Measures include PFS6-3.1 and PFS6-3.2.

PFS6-4 Promote recreation programs and facilities that meet the special needs of children, the elderly, and the disabled population. Associated Implementation Measures include PFS6-4.1 through PFS6-4.3.

Residual Impact
With implementation of these policies, impacts would be considered *less than significant*.

e. Solid Waste

PS Impact 5 Implementation of the proposed General Plan will increase the amount of solid waste generated by the city.

In accordance with Assembly Bill (AB) 939, the Integrated Waste Management Act, all cities or waste management districts are required to prepare a "Source Reduction and Recycling Element." This plan is designed to divert potential solid waste from landfills through source reduction, composting, and recycling. AB 939 required that solid waste disposal be reduced by 25 percent and 50 percent by the years 1995 and 2000, respectively. In response, the City developed the Coalinga Source Reduction and Recycling Element (SRRE). Implementation of the measures identified in the SRRE would reduce or divert approximately 50 percent of the solid waste reaching the landfill, thereby meeting state requirements. The City currently diverts approximately 25 tons/day from the local landfill, thereby meeting the 1995 requirements established by AB 939. Approximately 21 tons/day of solid waste is disposed at the landfill. Impacts caused by population growth under the General Plan Update 2025 are not anticipated to have a significant effect on solid waste disposal in the area because implementation of the SRRE will continue to allow the city to meet AB 939 goals despite growth anticipated in the proposed General Plan.

Mitigation Measures in the Proposed General Plan
Policy PFS9-1 and the two associated implementation measures in the proposed General Plan addresses solid waste management for the city.

PFS9-1 The City should promote the reduction of the amount of waste through: 1) waste reduction; 2) recycling; 3) waste to energy and composting; and, 4) proper landfill disposal of the remaining solid waste. Associated Implementation Measures include PFS9-1.1.

Residual Impact
With implementation of these policies, impacts would be considered *less than significant*.

PS Impact 6 The lack of adequate facilities and pick up services for HHW could result in an increased amount of common hazardous materials entering the landfill.

HHW is collected twice annually, once in spring and again in the fall, at rotating locations throughout the county (Personal Communication, Mid Valley Disposal, January 9, 2007). This is inconvenient, and can be difficult for residents to schedule for, and could lead to the disposal of dangerous chemicals, batteries, and petroleum products into normal garbage. While the County is working on developing a permanent, seven day a week facility for HHW drop off, the amount of hazardous waste that could be disposed of in the Coalinga land fill is potentially quite high.

Mitigation Measures in the Proposed General Plan
Policy S2-4 and its associated implementation measures in the Safety Element are dedicated to reducing the exposure of residents and the environment to hazardous materials.

> S2-4 The City shall seek to reduce the potential for exposure of hazardous substances to humans and the environment. Associated Implementation measures include S2-4.1 through 2-4.5.

While not specifically dedicated to the management or disposal of hazardous waste, the implementation measures do address the need for regular household hazardous waste disposal programs. The measures also call on the City to "vigorously prosecute unlicensed dumping of toxic or hazardous materials into the ground or the water in Coalinga." These enforcement policies are accompanied by educational measures, city support of public "right to know" laws, and requiring new businesses that use hazardous materials to locate in areas away from sensitive land uses.

Residual Impact
With implementation of these policies, impacts would be considered *less than significant*.

6. Cumulative Impacts

Implementation of the proposed General Plan and subsequent projects has the potential to result in significant cumulative impacts to public services. Cumulative impacts will be avoided or mitigated to less than significant by implementation of the Goals, Policies, and Implementation Measures in the Public Facilities and Services Element of the proposed General Plan. No additional mitigation measures are necessary.

H. PUBLIC UTILITIES

This section of the MEIR addresses potential impacts resulting from implementation of the proposed General Plan on public utilities. Information was obtained through discussions with city staff, review of the Water and Wastewater Master Plans, and review of city water consumption records.

1. Environmental Setting

a. Water Resources

Local groundwater is of poor quality and contains high concentrations of sodium, sulfates, and total dissolved solids (TDS). This condition occurs for groundwater at depths of 500, 1,000, and 1,500 feet; therefore, groundwater is not considered a viable source of potable water for the Coalinga planning area. Even for crop irrigation, groundwater is considered only of "marginal acceptability" because the groundwater tends to increase the concentrations of salts in the soil, further decreasing its agricultural suitability.

High levels of asbestos are found within surface drainages and water impoundments in the project area (Water System Master Plan - Boyle B, 2005). Naturally occurring asbestos is a mineral that enters local surface waters through erosion and sedimentation processes. The mountains to the west of Coalinga contain one of the largest deposits of naturally occurring short fiber asbestos in the country. Asbestos creates a major water quality concern for the Coalinga area as asbestos levels exceed the federal drinking water standards. Water quality impacts to surface water resources from agricultural operations are considered minimal; only trace amounts of pesticides and herbicides have been found in local water bodies. As a result of these conditions, all potable water used by the city is imported through the federal Central Valley Project – Bureau of Reclamation.

To obtain this supply the city entered into a forty-year contract with the United States Department of the Interior and the Bureau of Reclamation (Reclamation). The city's existing contract, in effect through December 31, 2010, obligates Reclamation to furnish Coalinga up to 10,000 acre-feet (af) of water per year. According to Reclamation, that contract is set to be renewed for an additional 40 year term, again at 10,000 af per year. That allocation is based upon water availability and is subject to reductions during drought years. The terms of the contract also establish that, commencing with the first year water is delivered to the city (1972), the minimum quantity of water that the city is obligated to accept and pay for throughout the life of the contract shall not be less than the average annual use for the previous five years. The city has never been in the position of having to pay for water that was not used or needed (Boyle B, 2005). According to Reclamation, Coalinga's historic usage total over recent years has averaged 7,500 af, while as demonstrated in the table below, the city most recent data put that number closer to 6,900 af.

The Reclamation Contract includes provisions for reducing the water allocation to the city during periods of drought. The exact amount of the reduction is based on water availability and the total amount of water purchased in the year prior to the drought conditions, rather than on the full 10,000 af allocation. The contract includes variable reductions based on the severity and duration of the drought. In the first dry year, the Bureau of Reclamation can reduce the city's

allocation to 75 percent of the previous year's use. In the second dry year, the allocation can be reduced to 50 percent of the historic amount. Thus, if the city uses 7,500 af in a normal year, their allocation could be cut to 5,625 af in the first dry year, and to 3,750 af in the second. The Bureau of Reclamation maintains the option to provide more water if the supplies are available, but for planning purposes it is advisable to determine the water supply based on a full reduction scenario. In this case, the city is faced with determining how to procure sufficient new water sources for anticipated growth. Some strategies include not allocating water to users such as Harris Ranch, purchasing water on the open market, strong conservation policies for existing users and use reduction strategies for new development.

TABLE V.H.-1
Key Water Projects in California

Project	Jurisdiction	Amount of Water Delivered Million Acre Feet (MAF) /Acre Feet (AF)
Central Valley Project	Federal	7 MAF
State Water Project	State	2.3 MAF
All-American Canal	Local	3 MAF
Colorado River Aqueduct	Local	1.2 MAF
Los Angeles Aqueduct	Local	200,000 AF
Mokelumne Aqueduct	Local	364,000 AF
San Francisco Hetch Hetchy Project	Local	330,000 AF

Source: Calaveras County Water District

California's rapidly growing population - estimated to reach 40 million by 2010 - is putting mounting pressure on the state's water supplies. State officials now predict that California will experience annual shortages of 4 MAF to 6 MAF by 2010 unless steps are taken now to address the declining reliability of the state's water supply system, according to the Calaveras County Water District.

1) Water Use

The city of Coalinga's water system currently services a variety of users including connections within the city limits, the Pleasant Valley State Prison, the Coalinga State Hospital, new State Hospital, a small rural supply system, two oil production facilities, and the Harris Ranch feedlot. Water has historically been delivered to the Polvadero Golf Course, but deliveries were cut dramatically in 2006 to only 4 acre feet. Deliveries to the golf course are expected to continue to decline. However, deliveries to the Harris Ranch feedlot have increased since 2002, resulting in an increased net use of water (refer to Table V.H.-1). The 2005 Water System Master Plan prepared by Boyle Engineering projected future demands on the water system by identifying existing demands for both treated and untreated water in the year 2000. The report found that the City treated a total of 1,582 million gallons (4,857 acre feet) in the year 2000 (Table 3-5 of the Water System Master Plan). In addition, approximately 1,054 million gallons (3,236 acre feet) of untreated water was used (Table 3-6, Water System Master Plan), although the majority of it,

997 million gallons (3,061 acre feet), was transferred to another Reclamation user. Future demand projections do not include transfers.

TABLE V.H.-2
Historic City Water Use (Acre-Feet)

Year	City	Polvadero	Harris	Total
2003	4,688	242	2,324	7,254
2004	4,980	355	2,257	7,592
2005	4,138	193	1,742	6,073
2006	4,680	4	1,869	6,553
Average	4,621	199	2,048	6,868

Source: City of Coalinga

The city's Water Master Plan separated future demand projections into two categories, "Yearly city demand" and "added demand." Added demand includes the State Prison, State Hospital, the small rural system, and other users outside of the city limits, such as the new residential development, energy producers and the feedlot. However, "added demand" did not include future anticipated residential development. This added demand, 693 million gallons (2,128 acre feet) per year is expected to stay constant throughout the year 2045.

2) Water System Overview

Water destined for Coalinga flows through the Coalinga Canal south from the San Luis Reservoir, as part of the Central Valley Project. This Federal facility, formerly called Pleasant Valley Canal, carries water from the turnout structure on the San Luis Canal to the Coalinga area, in Fresno County. The system includes a 1.6-mile intake channel to the Pleasant Valley Pumping Plant and 11.6 miles of canal. The initial capacity of the canal is 1,100 cfs, decreasing to 425 cfs at the terminus. Reaches 1 and 2 of the canal are operated by the Westlands Water District (WWD).

The water is carried in the Coalinga Canal approximately 12 miles south to the city of Coalinga water treatment plant intake, where Highway 145 crosses the California Aqueduct. A raw water pump station then lifts the water to the City's water treatment plant, which has a nominal capacity of 12 million gallons per day (MGD) and a hydraulic capacity of 16 MGD. After the water flows through the City's conventional filtration treatment plant, the treated water is pumped by a filtered-water water pump station into a 27-inch diameter pipeline in Palmer Avenue. Approximately two miles west of the water treatment plant, the flow tees at Calaveras Avenue. Water going to the city continues west another one and one half miles to the 2.8 MG Palmer Avenue Reservoir. At the Palmer Avenue Reservoir, a 16" pipe directs a portion of the flow to the north, where it connects to the 0.5 MG Oil King Reservoir serving the northern oil fields. Water going to the Pleasant Valley State Prison travels south in the 12-inch Calaveras Avenue pipeline to the 5 MG Calaveras Avenue Reservoir, where it continues 3.5 miles south on Calaveras Avenue to Jayne Avenue, and then approximately one mile east to the prison. Water

from the Palmer Avenue Reservoir flows through approximately eight miles of transmission mains to the 7.6MG Derrick Avenue Reservoir, the main reservoir for the city. The pipeline splits just above this reservoir, with a 10" line going north to the .2 MG Northwest Reservoir, which also serves the oil fields, and a 24" line connecting to the Derrick Avenue Reservoir. Water is dispersed from there through a 30-inch transmission main into the city of Coalinga distribution system. Total loss from the system is approximately 12 percent (Boyle B, 2005) annually, which is normal for a system of this size. Loss includes unauthorized and unmetered use, leaks, and discrepancies between measuring devices.

b. Wastewater

1) Existing Wastewater Treatment System

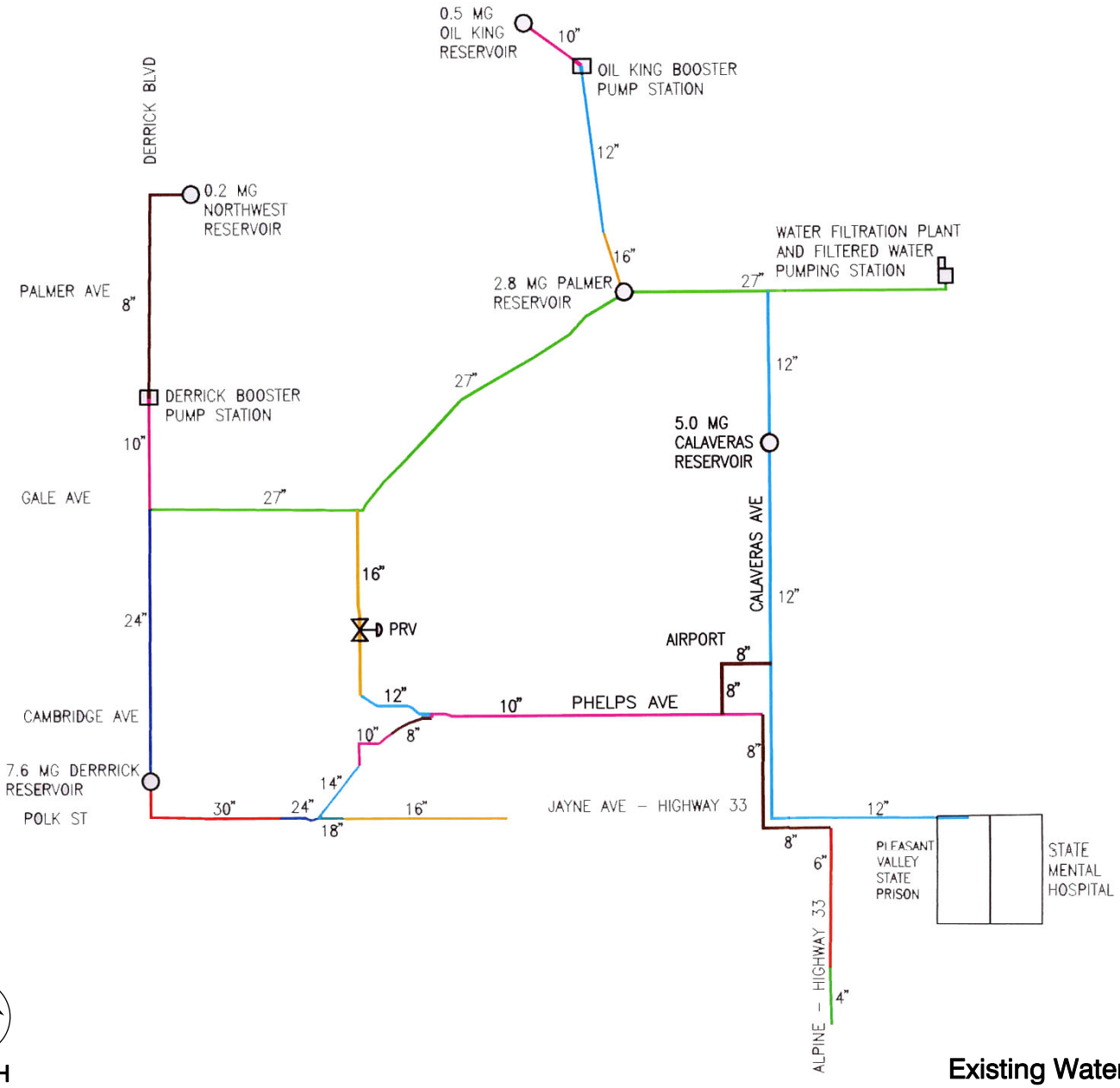
The City of Coalinga controls and administers the wastewater system for both domestic and industrial sewage. Effluent is collected and transported through City-owned pipe lines to the existing wastewater treatment facility, located on the east side of the city between Polk Street and Phelps Avenue along the Stanislaus Alignment. The facility has been upgraded to a secondary treatment plant, allowing it to process additional effluent and to generate cleaner wastewater. Maintenance of the city sewer system is financed by sewer charges. The wastewater treatment plant currently processes approximately 0.93 million gallons per day (mgd), and has a capacity of 1.34 mgd.

State regulations require that the City begin planning for a Waste Water Treatment Plant (WWTP) expansion once treatment volumes reached 80 percent of the plant's design capacity. The treatment volumes at the existing wastewater treatment plant are in excess of 70 percent capacity, prompting consideration of new or expanded facilities. In addition, the plant is often operating at 90 percent of its biological treatment capacity (Boyle C, 2005).

In February 2005, the City of Coalinga prepared a Sewer System Master Plan (Boyle, 2005). The plan identified existing deficiencies in the city's sewer system and recommended system improvements that would meet sewage system requirements at the present time and to the year 2020. The Sewer System Master Plan included an evaluation of the wastewater treatment plant.

2) Proposed Wastewater Treatment Plant

In 2006, the City certified a Program EIR (PEIR) for a new Wastewater Treatment Plant to be located east of town near the intersection of Highway 33 and Jayne Avenue. The primary objective of the project is to provide a new WWTP to provide adequate treatment capacity for development within the current city limits, and to provide treatment for future projects within the SOI through the year 2025. The proposed project was chosen based on considerations reviewed in the *Wastewater Treatment Plant Expansion/Relocation Feasibility Study* (Boyle, 2003) and the *Sewer System Master Plan* (Boyle, C., 2005). The proposed WWTP would replace the existing plant, moving the city's wastewater treatment facilities out of the path of anticipated city growth. Maximum capacity of the new wastewater treatment plant was expected to be 2.36 mgd. This capacity was expected to meet the demands (90 gallons per capita per day) of a total buildout population of 26,260. This buildout population is approximately 28,000 fewer than the 56,373 residents anticipated in the proposed General Plan.



Source: City of Coalinga - Water System Master Plan, Boyle Engineering, 2005

NORTH
Not to Scale

Existing Water Transmission System
FIGURE V.H.-1

Back of Figure V.H.-1

2. Regulatory Setting

Water rights and quality control are regulated by the State through the California Water Code and Title 22 of the California Code of Regulations. Title 22 provides Maximum Contaminant Levels (MCLs) for a number of organic and inorganic chemicals commonly found in industrial and commercial discharge, as well as naturally occurring soil contaminants. Water providers are required to provide regular reports regarding the bacterial and chemical constituents of the water supply, and surface water supplies must be continuously treated before entering a municipal distribution system (Title 22, Chapter 14, Articles 3 & 4). Regulatory authority and enforcement powers are vested in the Regional Water Quality Control Boards (RWQCB) by the Department of Water Resources and the Department of Health.

Quality standards for treated effluent are derived from federal and state water-quality laws. The State Water Quality Control Board set the specific requirements for the city of Coalinga in 1994, rescinding the previous standards set in 1984. Standards for quality of the treated effluent are set to protect present and potential customers and water bodies that receive the effluent, including recreation, agricultural supply, and fish and wildlife habitat. The standards include a prohibition against discharging effluent to surface waters or their drainage courses, and bypassing or overflowing untreated and/or partially treated effluent. Additional factors include a maximum monthly discharge rate not to exceed 1.34 million gallons per day (mgd) based on the plant capacity, a limitation on the distance that "objectionable odors" may be perceived, and a design that prevents inundation and/or washouts during 100 year flood events, as well as acceptable locations for reclaimed water disposal, disposal methods, and disposal site parameters. The Discharge Requirements also set restrictions on the allowable pH of the wastewater ponds and provide guidelines for the levels of various constituents in the effluent.

3. Thresholds of Significance

With respect to Public Utilities, Appendix G of the State CEQA *Guidelines* states that a significant impact would occur if the project:

1. Results in a determination by the wastewater treatment provider which serves the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments, and would require the expansion of existing facilities or the construction of new facilities.

2. Violates any water quality standards or waste discharge requirements, substantially degrades water quality, or exceeds wastewater treatment requirements of the applicable RWQCB agreements and would require the construction of new wastewater treatment facilities, the construction of which could cause significant environmental effects.

3. Substantially depletes groundwater supplies or interferes substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted);

4. Requires or results in the construction of new water treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental issues; or,

5. Did not have sufficient water supplies available to serve the project from existing entitlements and resources.

4. Impact Assessment and Methodology

Impacts to public services are assessed based on the general assumption that as the population of the city of Coalinga increases, additional services will be required to keep up with growth.

5. Impacts Discussion and Proposed Mitigation Measures

a. Water Supply

PU Impact 1 Implementation of the proposed General Plan will result in municipal water demand exceeding the city's existing supply.

Existing annual city demand is based on a calculated 271 gallon per capita daily (gpcd) consumption rate found in Boyle's Water System Master Plan. This is an equivalent of 0.41 afy/person. To calculate expected yearly future demand, this factor was multiplied by the anticipated population. The anticipated population projections in the Water System Master Plan do not reflect those in the proposed General Plan. The proposed General Plan anticipates a higher growth rate, with a buildout population of approximately 55,373 residents in the year 2025. The Water System Master Plan anticipated a population of 26,260 in that same year. However, for purposes of this EIR, the demand factor can still be applied to identify future demand per the General Plan scenario. Based on this factor, future "city demand" for water at buildout of proposed land uses (refer to Table 2-9 on page 2-37 of the proposed General Plan) would be approximately (81,240 x 0.41 afy), or 33,308 afy. However the city's reasonably foreseeable population or objective population for the year 2025 is 55,373 residents, putting the "city demand" at buildout at 22,703 afy. When combined with the "added demand" of 2,128 afy, the total reasonably foreseeable water demand in the Year 2025 equals 24,831 afy. Table V.H.-3 below displays anticipated water demand from the Year 2010 through 2025.

TABLE V.H.-3
Anticipated Future Water Demand in Acre-Feet per Year

Year	Projected Population	City Demand*
2010	*22,256*	*11,253*
2015	*33,295*	*15,779*
2020	*44,334*	*20,305*
2025	*55,373*	*24,831*

**Based on approximately .41 afy/per capita consumption*

The exact increase in water use will depend on how much the population grows over the next 20 years, what conservation measures are implemented by the city over the lifetime of the General Plan, how industrial uses (such as the oil companies and Harris Beef) are supplied, and how both recycled water and groundwater are utilized in the future. With a potable water allocation of only 10,000 afy from the Bureau of Reclamation and the potential for this allocation to be lessened during drought years, there is not enough water to supply future residential developments, provide a buffer for extended emergencies, or meet the needs of potential future industrial uses.

It is likely that the buildout in the General Plan will not occur unless the City finds a water source to support increased population. The City is aware of this issue and intends to designate a phasing plan for future development based on land use within the City's Sphere of Influence. Please refer to Figure V.H.-2. However, the City is in the process of updating its Housing Element, and one issue being addressed in this update is refinement of the jobs to housing balance in the City. The EIR consultant recommends that the following phasing plan be further refined as part of the Housing Element update, and that the City consider amending the Land Use Element of the general plan, if necessary, to include the Housing Element update information when that document is completed (estimated date of completion of the Housing Element update is June 2010).

The City is contemplating a five year phasing plan on areas within the Sphere of Influence for residential, commercial and industrial development, as follows:

Residential: Based on Figure V.H.-2, the City has identified five areas of future residential areas: one area is recommended for development by the year 2015, and the other four areas are recommended for consideration by the year 2020. The development potential of these residential areas would be further discussed in the City's Housing Element update.

Commercial: Based on Figure V.H.-2, the City has identified three areas for commercial development, and all of these areas are infill areas within the existing Sphere of Influence. The City is pursuing development of commercial properties since the City does not have enough commercial services to meet current population needs.

Industrial: Based on Figure V.H.-2 contained in the errata section of this Final Master EIR, the City has identified two major areas for industrial development. Granite Construction has already indicated a need to expand the existing gravel operation and this is expected to occur before 2015. The second area, located south of Jayne Avenue is expected to occur by 2020.

Water use reduction strategies could be developed to lower the relatively high assumption of 271 gpcd used by Boyle in the Water System Master Plan. Low flow toilet and shower systems are are examples of common and successful approaches to reducing consumption. This figure is based upon historic usage without emphasis on conservation programs. For example, each of the following cities report various usage levels based on per capita per day consumptions; use in the city of Long Beach is 121 gallons per day in 2006, down 12 percent from 138 gpcd in the year 2000. While the city of Fresno uses about 290 gpcd, the city of Tucson uses 175 gpcd and San Luis Obispo is closer to 145 gpcd.

Mitigation Measures in the Proposed General Plan

The following policies and their associated implementation measures are focused on efficiently utilizing water resources, developing infrastructure, and examining possibilities for utilizing treated waste water to augment existing supplies. Securing a permanent source to augment existing water supplies in order to facilitate anticipated growth will be necessary prior to annexation or any other type of development approval. Policies and implementation measures that reduce impacts have been included in the proposed General Plan and are listed as follows:

PFS8-1 The city shall provide adequate and efficient utility service to the residents of Coalinga. Associated Implementation Measures include: PFS8-1.1 through PFS8-1.7

PFS8-2 The city shall permit new development only when accompanied by adequate and efficient utility infrastructure and services and only when the effectiveness of existing infrastructure and services is not reduced. Associated Implementation Measures include PFS8-2.1 through PFS8-2.6.

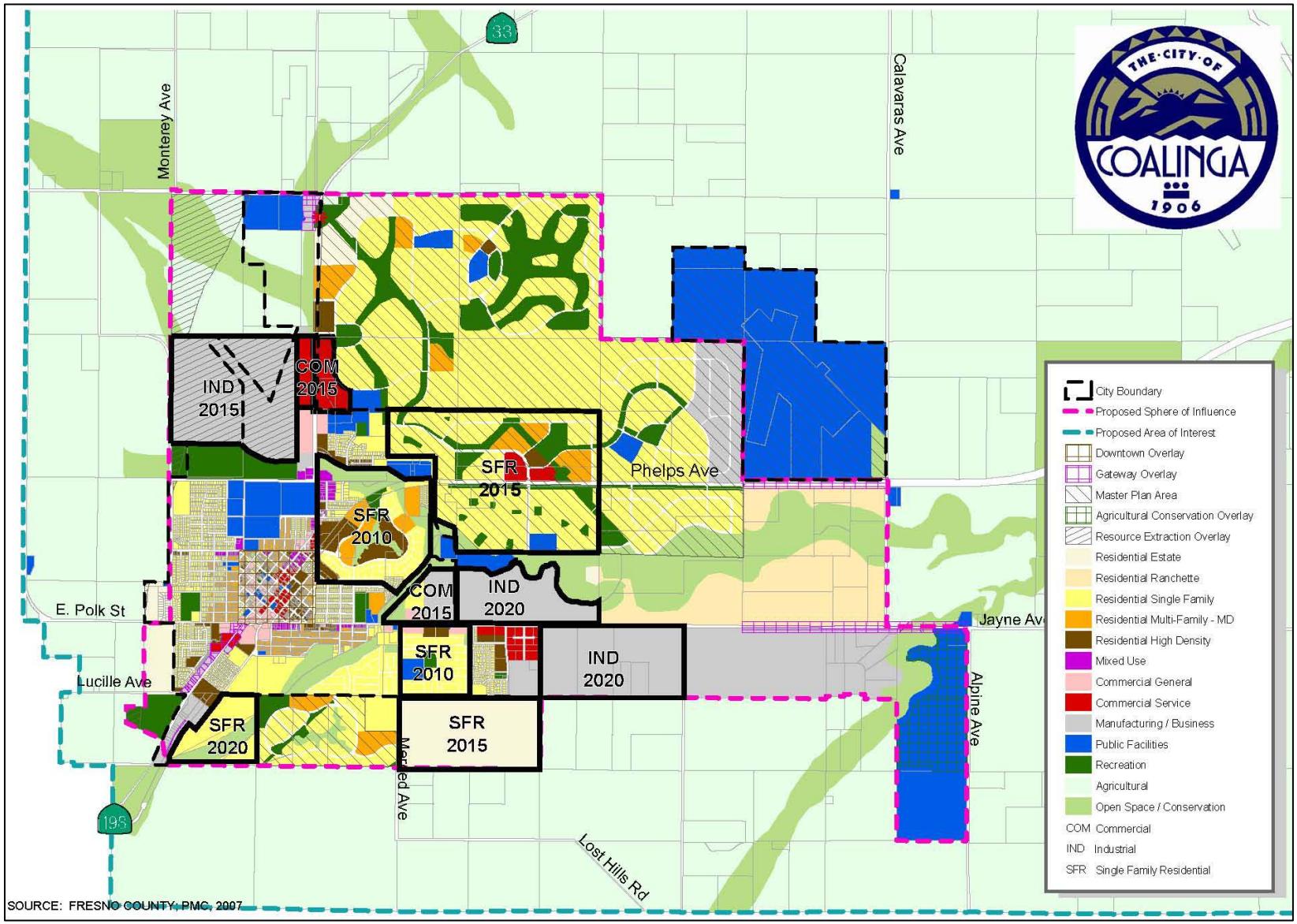
PFS8-3 The city shall reduce per capita per day water consumption from 271 gpcd to 200 gcpd by the year 2015. Associated Implementation Measures include PFS8-3.1 through PFS8-3.4.

The policies and their associated implementation measures recognize the importance of efficient water use and effective water conservation strategies in Coalinga. The relevant implementation measures and policies suggest a number of solutions and approaches to increasing water use efficiency and stretching existing supplies. The use of reclaimed, treated water for non-potable applications will be critical to augment limited supplies. This will be the case for both the existing WWTP and the one being planned for in future Capital Improvement Plans. Implementation Measures include utilizing reclaimed waste water for both public and private irrigation where not precluded by public health concerns, developing a Capital Improvement Plan for all utilities to meet the needs of new developments, and creating a program to anticipate annual growth and water demand in order to control growth. Other measures include coordinating with new developments to ensure adequate water supplies, and adopting water conservation measures, such as xeriscaping, to decrease per capita water usage. The Implementation Measures also require the city to investigate the feasibility of utilizing water banks.

Water banks are groundwater aquifers managed as storage facilities for surface water supplies. They allow their customers to “deposit” excess water during wet and normal water years that they are then able to access or “withdraw” during drought years. This would allow Coalinga to augment their dry year Bureau allocation with unused water banked from the previous year.

Residual Impact

Participation with a water bank would increase the city’s ability to cope with drought conditions, and ensure access to their entire contractual water allocation. It will not increase the city’s permanent supply of water and allow for increased build out, but will provide a supply buffer for dry years or other temporary increases in demand relative to supply.



Source: PMC, 2007, City of Coaling 2009

NORTH
Not to Scale

Potential Phasing Plan
FIGURE V.H.-2

Back of Figure V.H.-2

The supply of potable water is capped at 10,000 afy for the city, and there is no guarantee that water will be available for the amount of development outlined in the proposed General Plan. Furthermore, that supply is subject to reductions by the Bureau of Reclamation during dry years. Without the acquisition of a new water source, the city' potential build out population is approximately 24,390 persons, based on the current per capita water use rate of .41af/year. This is well under what the General Plan envisions at 55,373 total future population by 2025. Without a new water supply, the growth outlined in this General Plan cannot be accommodated. Therefore, if a new water supply is identified and implemented, the effects of the new supply could be considered growth inducing. While the growth is planned for, it cannot be accommodated under the existing constraints. The implementation of a new water supply would be growth inducing in that it would allow growth beyond the natural growth rate of the area.

With implementation of these policies, impacts would still be considered *significant and unavoidable.*

b. Wastewater Capacity

PU Impact 2 Demand for wastewater service resulting from the implementation of the proposed General Plan will exceed the city's wastewater treatment capability, requiring construction of new wastewater utility infrastructure.

As illustrated in Table V.H.-4, the expected wastewater demand resulting from buildout of the proposed General Plan will be approximately 4.98 (90 gpcd x 55,373) mgd. Anticipated capacity after construction of the new wastewater treatment plant is expected to be approximately 2.36 mgd, a deficiency of more than 300 percent. Because the design of the new plant has not been finalized, there may be opportunity to increase the design capacity and/or treatment levels of the plant, however, larger capacity may require more space (ponds) for treatment, requiring the City to annex and rezone additional lands not considered in the proposed General Plan.

TABLE V.H.-4
Anticipated Future Wastewater Demand in Million Gallons per Day

Year	Projected Population	Projected Wastewater Flow
2010	22,256	2.00
2015	33,295	3.00
2020	44,334	3.99
2025	55,373	4.98

Mitigation Measures in the proposed General Plan

The proposed General Plan recognizes potential deficiencies in the wastewater infrastructure associated with anticipated development. Policies and implementation measures that reduce

impacts to a less than significant level have been included in the proposed General Plan and are listed as follows:

PFS8-1 The City shall provide adequate and efficient utility service to the residents of Coalinga. Associated Implementation measures include PFS8-1.3, PFS8-1.4, PFS8-1.6, and PFS8-1.7.

PFS8-2 The City shall permit new development only when accompanied by adequate and efficient utility infrastructure and services and only when the effectiveness of existing infrastructure and services is not reduced. Associated Implementation Measures include PFS8-2.4 through PFS8-2.6.

Residual Impact
With implementation of these policies and associated implementation measures, impacts would be considered *less than significant.*

6. Cumulative Impacts

Implementation of the proposed General Plan and subsequent projects has the potential to result in significant cumulative impacts to public utilities. Cumulative impacts will be avoided or mitigated to less than significant by implementation of the Goals, Policies, and Implementation Measures in the Public Facilities and Services Element of the proposed General Plan, and the additional mitigation measures recommended above. No additional mitigation measures are necessary.

I. TRANSPORTATION AND CIRCULATION

This section of the MEIR addresses potential impacts resulting from implementation of the proposed General Plan on transportation and circulation. This section considers the existing local and regional circulation system in the Coalinga area, and identifies impacts that the proposed General Plan may have on that system. This section is based primarily on the proposed General Plan and the Circulation Report prepared by K.D. Anderson (refer to Appendix C).

1. Environmental Setting

a. Existing Circulation System

The city of Coalinga is served by a circulation system comprised of highways, arterial streets, collector streets and local streets. Highways are defined as roadways under the management of the State of California Department of Transportation (Caltrans) or the Federal Highways Administration (FHWA, usually administered through Caltrans). Arterials and collectors are managed locally at the city or county level, and defined by the number of lanes, the control and the daily traffic volumes.

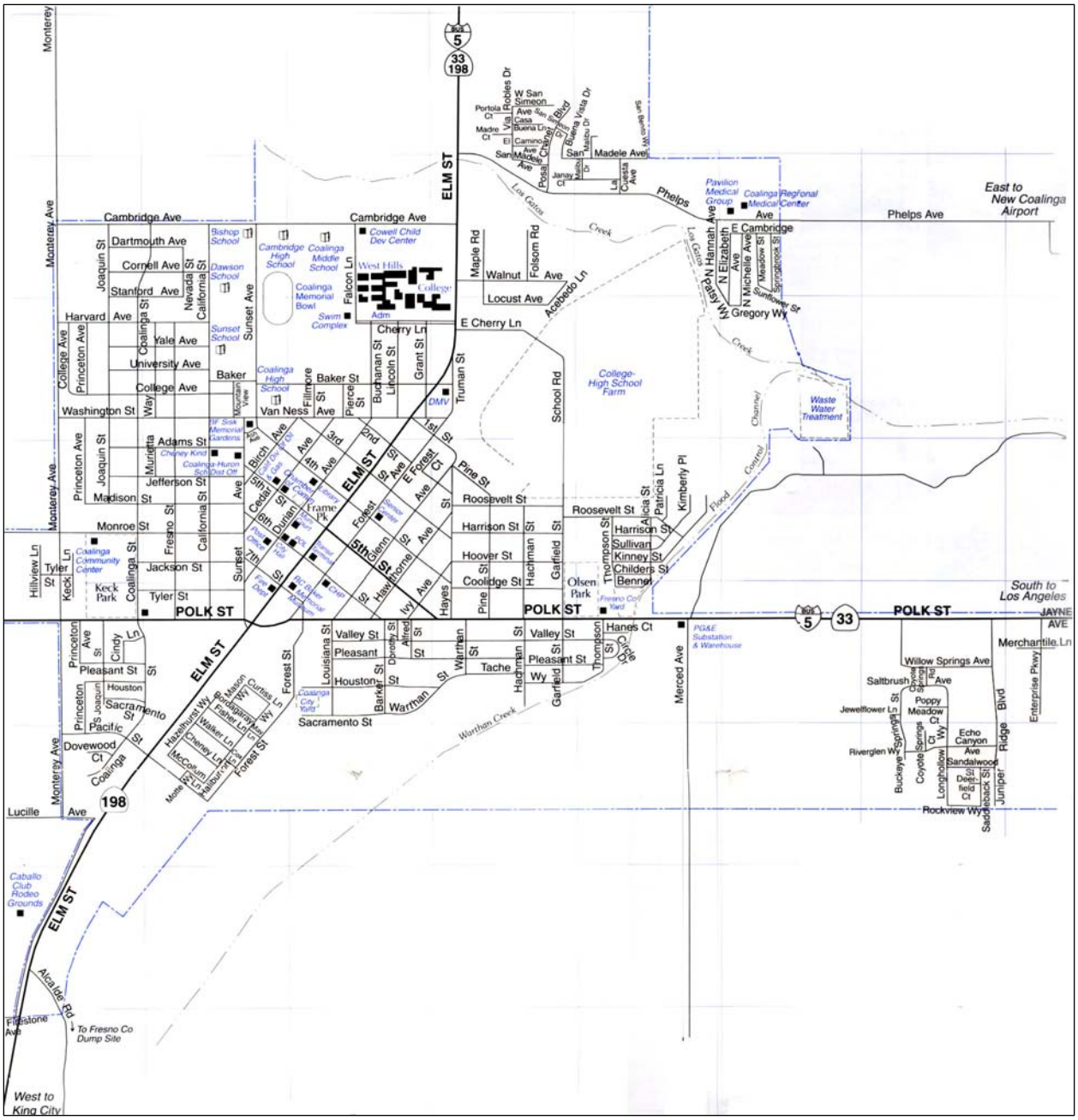
Three highways traverse the city of Coalinga. State Route 33 (Jayne Avenue, 5th Avenue and Polk Street) connects Interstate 5 to the east and State Route 41 to the south. State Route 198 connects to U.S. Highway 101 to the west and State Route 33/198 to the north. State Route 145 connects State Route 33 with Five Points and further north to Rolinda.

Major existing East-West streets, within the city of Coalinga include Phelps Avenue, Jayne Avenue (also SR 33), Cambridge Avenue, Van Ness Avenue, 5th Street, and Pacific Street. Major existing North-South streets within the city of Coalinga include Monterey Avenue, California Street, Hayes Avenue, Garfield Avenue, Juniper Ridge, and Calaveras Avenue. These roads are depicted graphically in Figure V.I.-1 and in the proposed General Plan Circulation Element, where they are also described.

1) Level of Service Thresholds for Existing Streets

Levels of Service (LOS) are used to describe the quality of traffic flow on city streets and state highways. LOS is a qualitative measure of traffic operating conditions whereby a letter grade, A through F, corresponding to progressively worsening traffic operating conditions, is assigned to an intersection or roadway segment. LOS A means that there is little to no delay at intersections, and free flowing traffic. LOS E and F occur when there are long delays at intersections, and roadways are at their maximum capacities. The major roads in the city, their roadway classifications, and existing LOS are summarized on Table V.I.-1. A description of LOS definitions, thresholds, and how they were applied to the existing street system is included in Appendix B.

Generally, the existing LOS on city streets are LOS A or B with a few exceptions, meaning that there are little or no delays in the flow of traffic or that delays are less than 25 seconds per vehicle. Two road segments currently operate at LOS C.



NORTH
Not to Scale

Existing Circulation – Local
FIGURE V.I.-1

TABLE V.I.-1
Existing Average Daily Traffic Volumes and Resulting Level of Service

Street	Location	Roadway Classification	Existing		
			Daily Traffic Volume	Lanes	Level of Service
STATE HIGHWAYS					
SR 33	Interstate 5 to SR 198 (North)	Arterial	2,800	2	A
	SR 198 (North) to Gale Avenue	Arterial	4,500	2	A
	Gale Avenue to Phelps Avenue	Arterial	5,800	2	A
	Phelps Avenue to Cambridge Avenue	Arterial	8,300	2	B
	Cambridge Avenue to Cherry Avenue	Arterial	8,300 (10,440)	4	A
	Cherry Avenue to Van Ness Avenue	Arterial	9,700	4	A
	Van Ness Avenue to 5th Street	Arterial	9,700	4	A
(5th Street) (Polk Street)	Elm Street to Polk Street	Arterial	6,300 (5,300)	2	B
	5th Street to Hayes Street	Arterial	10,600	2	C
	Hayes Street to Garfield Street	Arterial	10,600	2	C
	Garfield Street to Merced Avenue	Arterial	7,700 (7,850)	2	B (B)*
	Merced Avenue to Juniper Ridge	Arterial	7,100	2	B
	Juniper Ridge to San Joaquin Avenue	Arterial	7,100	2	B
	San Joaquin Avenue to Calaveras Avenue	Arterial	7,100	2	B
	Calaveras Avenue to Jayne Avenue	Arterial	7,100	2	B
SR 198	Firestone Avenue to Lucile Avenue	Arterial	1,500	2	A
	Lucile Avenue to Pacific Street	Arterial	1,500	2	A
	Pacific Street to Pleasant Street	Arterial	5,100	2	A
	Pleasant Street to Polk Street	Arterial	5,100 (3,450)	2	A (A)*
	Polk Street to 5th Street	Arterial	7,900	2	B
	SR 33 (North) to Interstate 5	Arterial	2,650	2	A
	Interstate 5 to Lassen Avenue	Arterial	6,600	2	A
SR 145	Interstate 5 to Exelsior Avenue	Arterial	4,200	2	A
EAST – WEST STREETS					
Phelps Avenue	SR 33 to Posa Chanet Boulevard	Arterial	4,100	2	A
	Posa Chanet Boulevard to Calaveras Avenue	Arterial	810	2	A
Cambridge Avenue	California Avenue to SR 33	Collector	2,835	2	A
Van Ness Avenue	California Avenue to SR 33	Collector	2,040	2	A
5th Street	SR 33 to Sunset	Collector	2,170	2	A
Pacific Street	SR 198 to West Forest Avenue	Collector	1,220	2	A
NORTH – SOUTH STREETS					
Monterey Avenue	Gale Avenue to Cambridge Avenue	Collector			
California Street	Washington Avenue to Polk Street	Collector	260	2	A

Street	Location	Roadway Classification	Existing		
			Daily Traffic Volume	Lanes	Level of Service
Hayes Avenue	Glenn Avenue to SR 33	Collector	1,100	2	A
Garfield Avenue	Roosevelt Street to SR 33	Collector	1,840	2	A
Juniper Ridge	SR 33 to Pacific Avenue	Collector	900	2	A
Calaveras Avenue	Phelps Avenue to SR 33	Collector	800	2	A
**(Volumes in brackets are spot counts on State highways)*					

Source: K.D. Anderson, Draft Traffic/Transportation Study, August 2008.

2) Levels of Service at Key Intersections

Current A.M. and P.M. peak hour LOS at key intersections in Coalinga are provided in Table V.I.-2. These values are based on recent intersection traffic counts taken by K.D. Anderson between 4:00P.M./6:00 P.M. in March, 2006. The current LOS at key intersections, are for the most part are operating at LOS B or better, with one eastbound/westbound stop operating at LOS D (SR33 (Elm Street)/Cambridge Avenue) during the A.M. peak hour. Two intersections operate at LOS C during the P.M. peak hour. These include the SR 33 (Polk St)/5th Street intersection and the SR 33 (Polk Street/Garfield Street) intersection.

TABLE V.I.-2
Existing Levels of Service at Key Intersections

Intersection	Control	A.M. Peak Hour		P.M. Peak Hour		Traffic Signal Warranted*?
		LOS	Average Delay (secs)	LOS	Average Delay (secs)	
SR 33 (Elm Street)/Phelps Avenue	Signal	B	13.6	B	14.6	n/a
SR 33 (Elm Street)/Cambridge Avenue	EB Stop	D	25.3	B	13.2	No
SR 33 (Elm Street)/Van Ness Avenue/ 1st Street	EB/WB Stop	B	13.5	B	14.7	No
SR 33 (Elm Street)/3rd Street	All-Way Stop	A	9.8	B	10.1	No
SR 33 (Elm Street)/5th Street	All-Way Stop	B	10.8	B	11.2	No
Elm Street/Polk Street	Signal	B	16.0	B	16.1	n/a
SR 198/Pacific Street	EB/WB Stop	B	10.4	B	10.7	No
Polk Street/Forest Avenue	NB/SB Stop	B	12.3	B	15.0	No
SR 33 (Polk Street)/5th Street	NB/SB Stop	B	13.5	C	16.9	No
SR 33 (Polk Street)/Garfield Street	NB/SB Stop	B	14.5	C	17.1	No
SR 33 (Polk Street)/Merced Avenue	NB/SB Stop	B	12.6	B	14.1	No
*Warrant review based on *Urban* volume requirements.						

Source: K.D. Anderson, Draft Traffic/Transportation Study, August, 2008.

b. Existing Transit System

Two transit systems serve Coalinga. Coalinga Transit currently provides demand responsive weekday service for the community. Scheduled round-trip intercity service to the Fresno-Clovis Metropolitan Area is available Monday through Saturday. Fresno County Rural Transit Agency (FCRTA) provides transit service in and between the rural incorporated and unincorporated communities of Fresno County, including Coalinga, and service is on a scheduled fixed route basis. FCRTA fares are subsidized in order to encourage frequent trips. Dial-a-ride is available within the city. Each of the FCRTA intercity buses are equipped with parcel and bicycle racks.

c. Existing Airport System

Coalinga currently has a municipal airport that contains two runways, a taxi area and terminal area. The existing Airport Runway was designed to accommodate single-wheel aircraft with a maximum gross weight of 30,000 pounds and dual-wheel aircraft with a maximum gross weight of 60,000 pounds. The airport is planned to handle single-engine and twin-engine propeller aircraft and occasional business jet aircraft.

According to the Draft Final Airport Master Plan, the City acquired 1,002 acres for the new airport facility. The 1990 Environmental Assessment/Environmental Impact Report (EA/EIR) for the New City of Coalinga Airport addressed the impacts associated with the operation of the airport facilities, and included about 248 acres of the 1,002-acre parcel. Only the 248 acres have been annexed into the city limits. About 320 acres of the 1,002-acre parcel were retained in agricultural use, and the remainder of the acreage been set aside for habitat conservation and was to be included in a Regional Habitat Conservation Plan.

The Airport Master Plan forecasts general aviation and air taxi aircraft to increase by an estimated 18,500 aircraft through 2014, or an average annual increase of 0.7 percent. The California Aviation System Plan predicts that based aircraft within the Central California Region will increase at an annual average growth rate of 1.9 percent through 2020, and annual general aviation aircraft operations will increase at an average annual rate of 1.9 percent. The number of based aircraft at the Coalinga Municipal Airport is forecast to increase from 19 aircraft in 2003 to 28 aircraft by 2025, an average annual increase of 1.8 percent. The number of annual aircraft operations at the Coalinga Municipal Airport is forecast to increase from an estimated 6,600 annual operations in 2003 to 9,200 annual operations by 2025, an average annual increase of 1.5 percent. The Airport Master Plan includes findings and recommendations for airport maintenance and growth to meet air and cargo needs. It recommends that the City acquire lands outside the present Airport property line for future runway expansion and improvements.

d. Existing Bicycle, Equestrian, and Walking Trails

Bikeways can be classified as either Class I, which provide for bicycle travel on a right-of-way completely separated from any street or highway; Class II, which provide a restricted right-of-way for bicycles stripped within paved areas of highways; or Class III, which are shared with pedestrian and auto-traffic. Existing designated bikeways are shown on Figure V.I.-2. Bikeways located on State Route 33 from State Route 198 east to Warthan Creek and Van Ness Avenue west of Highway 198 are all Class II bikeways. Regional bikeways serving areas beyond the city of Coalinga have been designated by the Fresno County Rural Bikeways Plan. These regional

bikeway routes includes Highway 22/198 north of the city; the Southern Pacific right-of-way along Phelps Avenue east to Huron; and Jayne Avenue east of the city. The Fresno County Rural Bikeways Plan indicates that the railroad right-of-way could provide bikeway linkage between Coalinga, Huron, Lemoore, Hanford and Visalia.

Coalinga also contains informal trails for walking, bicycling, and equestrian use. Both Warthan and Los Gatos Creeks provide trails through the city and to outlying areas. The gravel road along the west side and the paved road along the east side of Warthan Creek are used extensively by bicyclists, as are Los Gatos Creek trails. Equestrians use Warthan Creek and Los Gatos Creek Trails.

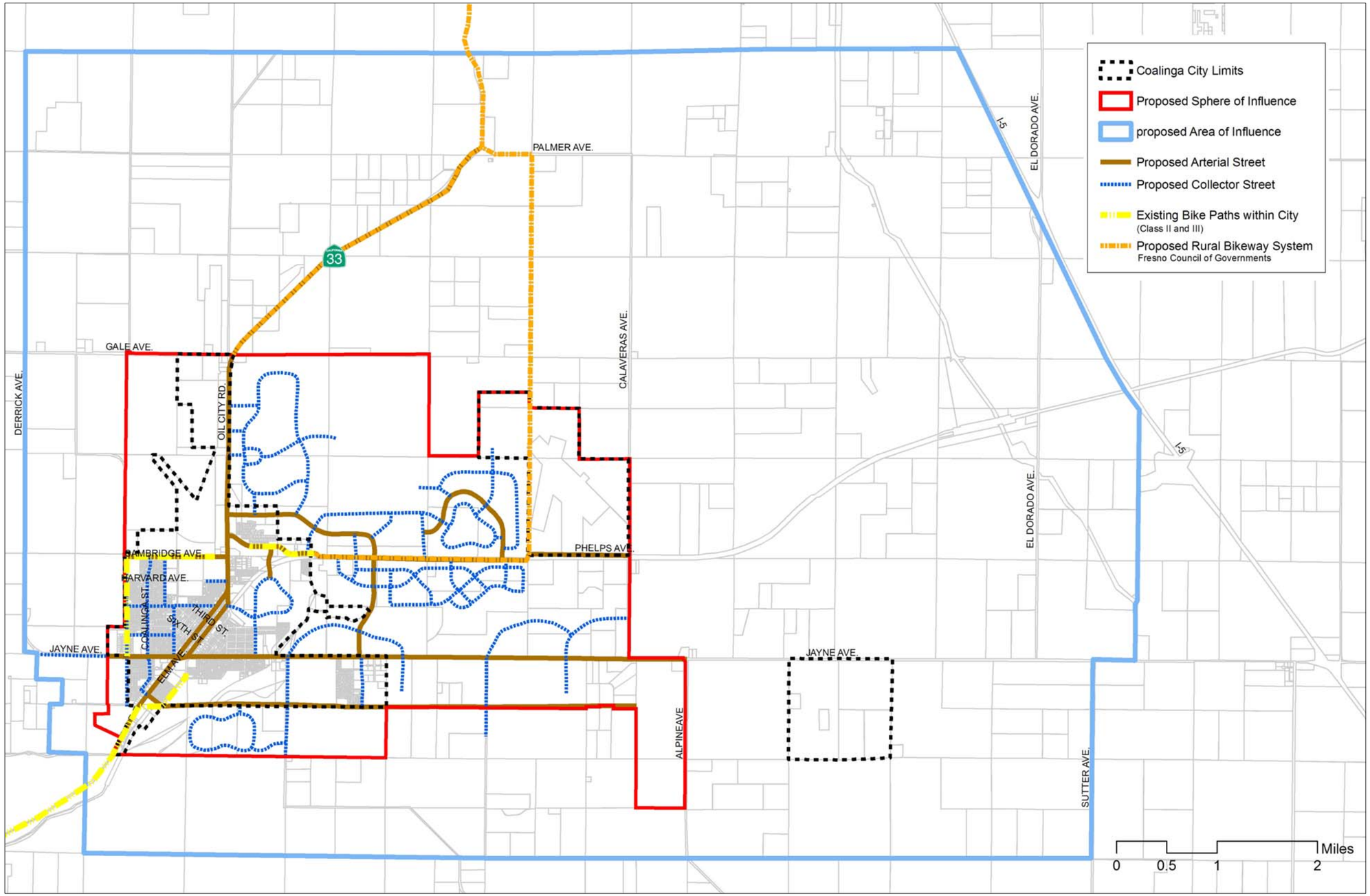
The U.S. Army Corps of Engineers has proposed the Los Gatos Creek Recreation Corridor Trail on the top of the levee at Warthan Creek Bridge north and west to Los Gatos Creek Bridge. This trail is expected to be constructed in conjunction with a flood control project in Coalinga.

2. Regulatory Setting

The City of Coalinga regulates public streets located within the city limits, other than the Highways. Highways are ultimately under the jurisdiction of Caltrans, although the two agencies coordinate proposed improvements. The City Public Works Department has established acceptable road widths, lengths, and overall design parameters for City-maintained roads, and these are implemented during the development review process. Transportation impacts are considered by the city during master planning and during the environmental review process required for discretionary projects. During this process, larger development projects generally must perform traffic impact studies prepared by professional engineers. These evaluate potential trip production rates for the proposed project and recommend measures such as new signals or additional travel lanes, to minimize traffic related impacts.

Transportation system requirements for unincorporated areas within the city's existing and proposed SOI would be subject to the policies and plans of the County of Fresno. The County outlines policies and standards regarding use of public roads in the County General Plan Circulation Element. The policies and standards provide guidance in defining whether proposed projects are consistent with established roadway capacity levels and intersection LOS.

Caltrans has jurisdiction over state highways, and coordinates its efforts with Federal Highways Administration (FHWA), local councils of governments and cities and counties. Jayne Avenue and Alpine Avenue are designated as State Route 33, and State Route 198. State Route 145 and Interstate 5 would also fall within Caltrans jurisdiction.



NORTH
Scale as shown

Proposed and Existing Bikeways
FIGURE V.I.-2

Back of Figure V.I.-2

3. Thresholds of Significance

In evaluating roadway operating conditions, LOS A through F are applied, with LOS A indicating very good operating condition, and LOS F indicating poor conditions. Each community defines which LOS is acceptable on public roads and at intersections.

In this evaluation of the proposed General Plan, four sets of impact thresholds would apply: City of Coalinga thresholds (LOS D), Fresno County (LOS C in rural areas), Caltrans (LOS C for State facilities) and CEQA thresholds. As defined in Appendix G of the CEQA *Guidelines*, CEQA thresholds of significance would be exceeded if a project resulting from the proposed General Plan would:

a. Cause an increase in traffic that is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicles trips, the volume to capacity ratio on roads, or congestion at intersections).
b. Exceed, either individually or cumulatively, an LOS standard established by the county congestion management agency for designated roads or highway.
c. Result in a change in air traffic patterns, including either in increase in traffic levels or a change in location that results in substantial safety risks.
d. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).
e. Result in inadequate emergency access.
f. Result in inadequate parking capacity.
g. Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks).

4. Impact Assessment and Methodology

Transportation and Circulation impacts have been determined based on review of the proposed General Circulation and Land Use Elements, and the Traffic Impact Analysis prepared by K.D. Anderson (refer to Appendix C). It identified existing LOS on public roads and intersections within the planning area, and determined how that LOS would be affected due to implementation of the proposed General Plan. Improvements intended to accommodate the proposed land use changes have been proposed and included in the Circulation Element. The resulting LOS was then recalculated. Impacts were identified based on exceedence of established LOS thresholds for the appropriate agency, and on other potential impacts as defined in the CEQA *Guidelines*. For State highways located within the city limits, an exceedence of LOS C, the Caltrans standard, was considered significant.

Table V.I.-3 includes the streets considered in the analysis, the roadway classification, the anticipated daily traffic volumes, the number of lanes anticipated in the Circulation Element, and the resulting LOS at buildout of the General Plan. The resulting LOS appears in boldface in those areas where street segments are expected to exceed applicable LOS thresholds.

TABLE V.I.-3
Average Daily Volumes and Resulting Level of Service at Buildout

Street	Location	Roadway Classification	Buildout		
			Daily Traffic Volume	Lanes	Level of Service
STATE HIGHWAYS					
SR 33 (Elm Street)	Interstate 5 to SR 198 (North)	Arterial	26,450	4	C-D
	SR 198 (North) to Gale Avenue	Arterial	29,600	4	D
	Gale Avenue to North Wellington	Arterial	29,125	4	D
	North Wellington to Central Wellington	Arterial	23,125	4	C
	Central Wellington to South Wellington	Arterial	32,150	4	D
	South Wellington to Phelps Avenue	Arterial	31,100	4	D
	Phelps Avenue to Cambridge Avenue	Arterial	31,150	4	D
	Cambridge Avenue to Cherry Avenue	Arterial	21,050	4	C
	Cherry Avenue to Van Ness Avenue	Arterial	21,100	4	C
	Van Ness Avenue to 5th Street	Arterial	16,200	2	E
(5th Street)	Elm Street to Polk Street	Arterial	8,675	2	B
SR 33 (Polk Street)	5th Street to Hayes Street	Arterial	19,375	4	C
	Hayes Street to Garfield Street	Arterial	23,550	4	C
	Garfield Street to Merced Avenue	Arterial	38,575	4	F
	Merced Avenue to Juniper Ridge	Arterial	40,150	4	F
	Juniper Ridge to San Joaquin Avenue	Arterial	35,675	4	F
	San Joaquin Avenue to Calaveras Avenue	Arterial	32,250	4	D
	Calaveras Avenue to Jayne Avenue	Arterial	27,600	4	D
Jayne Avenue (County Road)	SR 33 to El Dorado Avenue	Arterial	25,150	4	C
	El Dorado Avenue to Interstate 5	Arterial	18,900	2	F
	East of Interstate 5	Arterial	10,975	2	C
SR 198	Firestone Avenue to Lucile Avenue	Arterial	2,850	2	A
	Lucile Avenue to Pacific Street	Arterial	6,875	2	A
	Pacific Street to Pleasant Street	Arterial	10,875	2	C
	Pleasant Street to Polk Street	Arterial	21,475	4	C
	Polk Street to 5th Street	Arterial	16,625	4	B
	SR 33 (North) to Interstate 5	Arterial	3,925	2	A
	East of Interstate 5 to Lassen	Arterial	9,775	2	C
SR 145	Interstate 5 to Excelsior Avenue	Arterial	21,150	2	F
EAST – WEST STREETS					
Gale Avenue	Monterey Avenue to SR 33	Collector	1,425	2	A
Wellington North Access	SR 33 to Loop	Arterial	7,000	2	B

Street	Location	Roadway Classification	Buildout		
			Daily Traffic Volume	Lanes	Level of Service
Wellington South Access	SR 33 to Loop	Arterial	1,425	2	A
	Loop to Collector	Arterial	7,000	2	B
	Collector to Juniper Ridge	Arterial	1,425	2	A
Phelps Avenue	SR 33 to Posa Chanet Boulevard	Arterial	7,000	2	B
	Posa Chanet Boulevard to School Farm Connection	Arterial	1,425	2	A
	School Farm Connection to Wellington Connection	Arterial	7,000	2	B
	Wellington Connection to Juniper Ridge	Arterial	1,425	2	A
	Extension to New Street	Arterial	7,000	2	B
	New Street to East Loop	Arterial	1,425	2	A
	East Street to Calaveras Avenue	Arterial	7,000	2	B
	Calaveras Avenue to El Dorado Avenue	Arterial	1,425	2	A
Cambridge Avenue	Monterey Avenue to California Avenue	Collector	7,000	2	B
	California Avenue to SR 33	Collector	1,425	2	A
Washington Street	Monterey Avenue to California Avenue	Collector	7,000	2	B
Van Ness Avenue	California Avenue to SR 33	Collector	1,425	2	A
1st Street – Van Ness	SR 33 to East Glenn Avenue	Collector	7,000	2	B
5th Street	SR 33 to SR 33	Arterial	1,425	2	A
	SR 33 to Sunset	Collector	7,000	2	B
West Polk Street	Monterey Avenue to California Avenue	Collector	1,425	2	A
	California Avenue to SR 33	Collector	7,000	2	B
Polk Street	SR 198 to 5th Street	Collector	1,425	2	A
Pacific Street	Monterey Avenue to SR 198	Collector	7,000	2	B
	SR 198 to West Forest Avenue	Collector	1,425	2	A
	West Forest Avenue to Merced Avenue	Collector	7,000	2	B
Pacific Street	Merced Avenue to Juniper Ridge	Collector	1,425	2	A
	Juniper Ridge to San Joaquin Avenue	Collector	7,000	2	B
NORTH – SOUTH STREETS					
Monterey Avenue	Gale Avenue to Cambridge Avenue	Collector	7,000	2	B
	Cambridge Avenue to Polk Street	Collector	1,425	2	A
	Polk Street to Pacific Avenue	Collector	7,000	2	B
California Avenue	Cambridge Avenue to Washington Avenue	Collector	1,425	2	A
	Washington Avenue to Polk Street	Collector	7,000	2	B
Hayes Avenue	Glenn Avenue to SR 33	Collector	1,425	2	A

Street	Location	Roadway Classification	Buildout		
			Daily Traffic Volume	Lanes	Level of Service
School Road	North of Roosevelt Street	Arterial	7,000	2	B
	South of Phelps Avenue	Arterial	1,425	2	A
Garfield Avenue	Roosevelt Street to SR 33	Collector	7,000	2	B
Merced Avenue	SR 33 to Pacific Street	Collector	1,425	2	A
Juniper Ridge	South Wellington to Phelps Avenue	Arterial	7,000	2	B
	Phelps Avenue to Bridge	Arterial	1,425	2	A
	Bridge to SR 33	Arterial	7,000	2	B
Juniper Ridge	SR 33 to Pacific Avenue	Arterial	1,425	2	A
San Joaquin Ave	SR 33 to Pacific Avenue	Collector	10,625	2	D
Calaveras Avenue	Phelps Avenue to SR 33	Collector	8,000	2	A

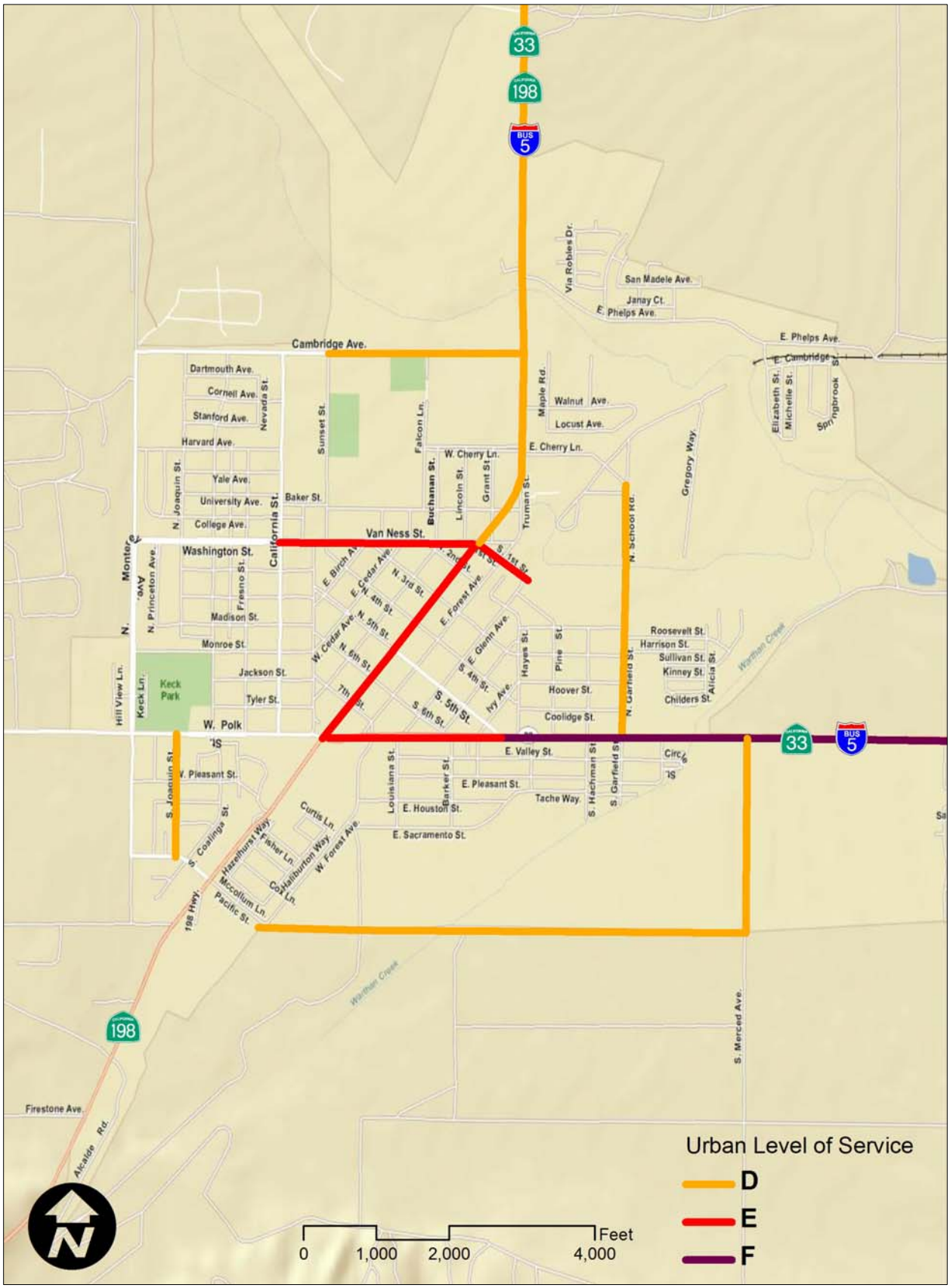
Source: K.D. Anderson, Draft Traffic/Transportation Study, August, 2008.

5. Impacts Discussion and Proposed Mitigation Measures

TC Impact 1 Implementation of the proposed General Plan would result in a substantial increase in the number of vehicle trips, and exceed LOS standards established by the City of Coalinga for designated intersections, roads and highways in the urban areas.

LOS thresholds on thirteen (13) street segments within the city limits and proposed SOI (urban areas) would be exceeded after implementation of the proposed General Plan. These areas are shown graphically in Figure V.I.-3. The data in Table V.I.-3 shows that in some cases traffic volumes increase well over 100 percent, with as much as a 500 percent increase on some segments of Garfield, Van Ness , and Hayes Avenues.

LOS on Van Ness Street in particular is expected to drop from LOS A to LOS E or F. This significant drop in LOS is anticipated due to development anticipated on the north and east side of the city. Connections are limited in this area, and as a result, the Van Ness/First Street route will be heavily impacted. A similar scenario is anticipated for Elm Street (SR 33) near Cambridge Avenue where LOS is expected to drop from B to D or E even after the proposed road geometry is implemented. As the Circulation Study notes, intensive mitigation, such as the development of Access Management Plans, construction of auxiliary turn lanes, and signalization would potentially result in a LOS better than D; however, that result is not conclusive, and the mitigation proposed is dependent upon Caltrans funding and coordination.



Source: ArcGIS Online

Level of Service – Urban
FIGURE V.I.-3

Back of Figure V.I.-3

Mitigation Measures in the Proposed General Plan

New policies in the proposed General Plan and their associated implementation measures would reduce potential circulation impacts. Proposed General Plan policies that would reduce significant impacts include:

LU1-4 Fiscal impacts of development shall be considered to ensure that there are adequate resources for providing all required public facilities, infrastructure, and services. Associated Implementation Measures associated with this policy include LU1-4.1 through LU-4.3.

LU1-5 Encourage consistent and comprehensive planning for the city. The Associated Implementation Measures include LU1-5.8.

LU5-2 The City shall enhance the city's historic Downtown core by creating an efficient, attractive, and pedestrian-oriented area that reflects the city's historic character while providing a diverse mix of uses. Associated Implementation Measures include LU5-2.1.

C1-1 The City shall require that new development provide the necessary infrastructure to serve itself consistent with the city-wide circulation system as shown on Figure 4-2, presented earlier (see Figure I-4 above). Associated Implementation Measures include C1-1.1, C1-1.2, and C1-1.3.

C1-2 New development projects shall be required to mitigate their impacts and to pay their fair share of countywide traffic improvements they contribute to the need for. Associated Implementation Measures include C1-2.1, C1-2.2, and C1-2.3.

C1-3 The City recognizes that LOS D may not always be achieved on some roadway segments, and may also not be achieved at some intersections. Roadways on which LOS D is projected to be exceeded are shown in the General Plan or the General Plan EIR, based on the study conducted by K.D. Anderson (October, 2006). On these roadways, the City shall ensure that improvements to construct the ultimate roadway system as shown in this Circulation Element are completed, with the recognition that maintenance of the desired LOS may not be achievable. Associated Implementation Measures include C1-3.1, C1-3.3.

C1-4 Maintain and improve existing circulation and transportation facilities. Associated Implementation Measures include C1-4.2, C1-4.3, and C1-4.4.

C1-5 The City shall identify necessary improvements for all roads and streets in its planning area and implement measures and development plans to implement those improvements. Associated Implementation Measures include C1-5.1, C1-5.2, and C1-5.3.

C1-6 Shall encourage the use of transportation alternatives that reduce the use of personal vehicles. Associated Implementation Measures include C1-6.1 through C1-6.3.

C1-7 Shall require that transit service is provided in all areas of Coalinga, so that transit dependent residents of those areas are not cut off from community services, events, and activities. Associated Implementation Measures include C1-7.1.

C2-1 Promote non-motorized bike and pedestrian circulation facilities to serve all areas of the city and link regional systems, with priority coordination with school, park, transit, and major facilities. Associated Implementation Measures include C2-1.1, C2-1.2, and C2-1.3.

C3-1 Promote installation of additional, distinctive transit stops at key activity areas and encourage covered shelters at new stops that are linked to safe pedestrian and bicycle routes. Associated Implementation Measures include C3-1.1 through C3-1.6.

Residual Impact

Due to constraints within the city of Coalinga, including the lack of right-of-way in the downtown area, it may be physically impossible to make the road improvements (i.e., widening) that would be necessary to potentially reduce impacts to a less than significant level. In addition, because road improvements on major streets within the city, including Elm Street and Polk Street are also State Highways, it may be difficult to coordinate improvements when they become necessary. For example, even if a developer pays their "fair share" towards road improvements, those improvements would need to be programmed and constructed by Caltrans, which may occur at a future date, rather than when the impact demands it. As a result, the impacts would be *adverse, significant and unavoidable*.

TC Impact 2 Implementation of the proposed General Plan would result in a substantial increase in the number of vehicles trips, and contribute to an exceedence of LOS standards established by the County of Fresno and Caltrans for designated intersections, roads and highways in the rural areas.

LOS thresholds on three street segments outside of the proposed SOI would be exceeded as a result of implementation of the proposed General Plan. These areas are shown in Table V.I.-3 and graphically in Figure V.I.-4. They are located a considerable distance from the city limits and proposed SOI, and reflect not only the growth anticipated in the General Plan, but also that anticipated by the FCOG based on their modeling of future traffic volumes in Fresno County.

The traffic modeling also indicates that the number of nonresidential trips generated at buildout of the proposed General Plan exceeds the number of residential trips generated, suggesting that the increase in commercial development and employment centers will attract drivers from out of the city limits, impacting the regional road system. The report notes that ultimately "four lane roadways will be needed to link Coalinga with the balance of Fresno County."

Mitigation Measures in the Proposed General Plan
New policies in the proposed General Plan and their associated implementation measures would reduce potential impacts but not to a less than significant level. These policies include:

C1-2 New development projects shall be required to mitigate their impacts and to pay their fare share of countywide traffic improvements they contribute the need for. Associated Implementation Measures include 1-2.1 through 1-2.3.

C1-6 Shall encourage the use of transportation alternatives that reduce the use of personal vehicles. Associated Implementation Measures include 1-6.1 through 1-6.3.

Residual Impact
As with the previous impact, because these impacts would occur in areas that do not fall under the City's jurisdiction, it would be necessary to coordinate any necessary improvements with other agencies, including the County of Fresno, the Fresno Council of Governments and Caltrans. These agencies coordinate regional improvements based on demand, available funds, and on long-term capital improvement construction programs. As a result, there is no guarantee that the required improvements could be made when demand for them necessitates it. Therefore, this impact should be considered *significant and unavoidable*.

TC Impact 3 Implementation of the proposed General Plan may result in inadequate emergency access, parking capacity, and/or may conflict with programs supporting alternative transportation.

Based on population growth anticipated by the next twenty years, a number of large scale developments, which include or will require new arterial and collector streets will be constructed in the city. In addition, a number of new traffic signals, bicycle lanes, trails and public facilities such as schools and parks will be constructed. If these transportation and circulation components of these improvements aren't coordinated, there is the potential that they may not function as efficiently as anticipated, resulting in parking deficiencies, inadequate emergency access, and uncoordinated alternative transportation improvements such as bikeways, bus shelters, etc. that will be required as a result of growth anticipated in the proposed General Plan.

Mitigation Measures in the Proposed General Plan
Policies and implementation measures that reduce impacts to a less than significant level have been included in the proposed General Plan and are listed as follows:

C1-1 The City shall require that new development provide the necessary infrastructure to serve itself consistent with the city-wide circulation system, as shown in Figure 4-2, presented earlier. Associated Implementation Measures include: 1-1.1 through 1-1.3.

C2-1 Promote non-motorized bike and pedestrian circulation facilities to serve all areas of the city and link regional systems, with priority coordination with

school, park, transit, and major facilities. Associated Implementation Measures include: 2-1.1 through 2-1.3.

C3-1 Promote installation of additional, distinctive transit stops at key activity areas and encourage covered shelters at new stops that are linked to safe pedestrian and bicycle routes. Associated Implementation Measures include: 3-1.1 through 3-1.6.

Residual Impact
With implementation of these policies, impacts would be considered *less than significant.*

6. Cumulative Impacts

Based on information in the traffic study (refer to Appendix C), implementation of the proposed General Plan, in conjunction with development expected to occur throughout the rest of Fresno County and the San Joaquin Valley, will most likely result in exceedence of LOS thresholds. At minimum, it will result in a significant new traffic loads when compared to the existing volumes in Coalinga. Implementation of the Goals, Policies, and Implementation Measures in the proposed General Plan, and the additional mitigation measures recommended in the traffic study, including new intersection and road geometries, signalizations, and passing lanes will help to reduce potential impacts. Ultimately, efforts to mitigate Traffic and Circulation impacts will require subsequent environmental review and intensive coordination between local, regional and state agencies. However, in some cases it may be infeasible to achieve LOS thresholds in and around the city of Coalinga, particularly on State Highways, due to physical and economic constraints. As a result, cumulative Transportation and circulation impacts should be considered *significant and unavoidable, Class I.*



Source: ArcGIS Online

Level of Service – Rural
FIGURE V.I.-4

Back of V.I.-4

J. NOISE

Noise is a complex physical phenomenon that varies with time, geographic location, proximity to the source, and duration of the noise event. The effects of noise are considered in two ways: how a proposed project may increase existing noise levels and affect surrounding land uses; and how a proposed land use may be affected by noise from existing and surrounding land uses. The following section addresses potential impacts resulting from implementation of the proposed General Plan on noise, and discusses the fundamentals of sound and noise measurements, describes the existing noise environment of the proposed General Plan SOI area, provides Federal, State, and local noise guidelines and policies, and evaluates potential noise impacts that would be encountered throughout the area. Policies in the proposed Noise Element provide mitigation for potential noise impacts. Additional mitigation measures were considered, as necessary.

1. Environmental Setting

a. Noise Definition and Terminology

Noise, as used herein, is defined as unwanted sound. Since instruments that detect small changes in atmospheric pressure that are perceived as sound cannot distinguish between that which is wanted (e.g., birds singing, waves on a beach, etc.) and that which is not (e.g., traffic or railroad noise), measurements of "noise" are more accurately described as measurements of sound pressure.

Noise sources and sound intensities can vary significantly from one area of the city to another. Variables that affect how traffic noise is perceived for example include vehicular volume, proximity to the noise source, time of day, speed, roadway configuration, and the acoustical and topographical characteristics of the site. For example, Jayne Avenue (Highway 33) traffic noise could be substantial at a given location if the noise measurement is taken during peak hour traffic at a short distance from the roadway. Given the same conditions, the same noise measured at a greater distance or an area that was shielded by some form of a barrier or structure might be perceived as barely noticeable.

Topography also plays a significant role in the perception of traffic related noise emissions. Road segments that are cut below or significantly elevated above the grade at which noise is measured will generally produce a quieter noise environment. Sites that have abundant vegetation and an undulating profile (soft sites) will absorb sound pressure waves much better than an area that is predominantly asphalt or concrete (hard site). Under normal conditions, noise will attenuate (drop-off) at an approximate rate of 3.0 dBA per doubling of distance (DD) for a line source (i.e. traffic sources) and up to 6.0 dBA/DD for a point (stationary) source. For topography on non-developed parcels or parcels that are used for various types of agriculture, they would be characterized as "soft" sites because of natural landscaping or due to the presence of tilled soil and row crops with intervening vegetation. Soft sites are more absorptive than reflective of sound pressure waves because they have an absorptive ground surface such as soft dirt, grasses, vegetation, or scattered bushes and trees. An excess ground attenuation value of 1.5 dBA/DD over standard conditions would be assumed for undeveloped areas or agricultural parcels. When added to geometric spreading of sound, this results in an overall noise drop-off

rate of approximately 4.5 dBA/DD for a line source (i.e., traffic sources) and up to 7.5 dBA/DD for a point (stationary) source.

b. Identified Sensitive Land Uses

Land uses immediately surrounding existing city limits within the SOI include open-space and rangeland to the north and east, agricultural uses to the west, north, south, and east, and public facilities to the east (Pleasant Valley State Prison, Coalinga State Hospital). Noise resulting from automobile traffic and agricultural operations are the primary noise-producing sources within the SOI area.

Certain land uses are considered more sensitive to ambient noise levels than others, due to the amount of noise exposure and the types of activities involved. In general, existing noise-sensitive land uses identified within the city include but are not limited to the following:

- Residential development;
- Schools-preschool to secondary, college; specialized education and training;
- Health care services (hospital);
- Nursing and personal care;
- Churches;
- Public assembly and entertainment;
- Libraries and museums;
- Hotels and motels;
- Outdoor sports and recreation; and,
- Offices.

c. Existing Noise Environment

The city of Coalinga is located in a broad valley on the eastern side of the coast mountain range, along the western edge of California's Central Valley. The SOI area in the proposed General Plan are mostly located in semi-rural areas adjacent to existing city limits, which are presently used for agricultural operations. There are a number of potentially significant sources of community noise within the existing city limits and proposed SOI. These sources include traffic on state highways, major county roadways and city streets, airport operations, mining and industrial facilities, and agricultural operations.

On-site noise monitoring conducted within the SOI area on August 26, 2006, indicates that typical peak-hour noise levels in noise-sensitive areas range from approximately 35-68 dB $L_{eq.}$ The quietest areas are those that are removed from major transportation-related noise sources and local industrial or other stationary noise sources. A representative example of these quiet areas include the rural areas adjacent to Merced Avenue, Jayne Avenue east of Merced Avenue, West Phelps Avenue, East and West Elm Avenue, and areas surrounding Warthan and Los Gatos Creeks. The noisier locations identified in the SOI are within existing city limits and areas located near Highway 33 (Jayne Avenue) and Highway 198 (Elm Avenue/Oil City Road), and other major urban local streets. The existing City Noise Element indicates that existing background noise levels in many areas of the SOI that contain noise-sensitive land uses are

relatively quiet. To preserve quiet conditions, the City has adopted noise level standards and policies to prevent degradation of the existing noise environment as much as possible.

1) Transportation Noise Sources

Sources of transportation noise include traffic on public roadways, railroad lines, and airports. Control of these noise sources is usually preempted by existing federal or state regulations. However, regulating the location and design of specific land uses affected by these sources may control the effects of noise from transportation sources.

(a) State Highways and Major County Roadways

Major highway transportation related noise sources within the city include areas that are in close proximity to Highways 33, and 198. Generalized noise contours have been generated for this EIR. The existing, 60 dBA L_{dn} noise contour (60 dBA is the City threshold for mitigation) for Highway 33 and 198, are located a distance of approximately 100-200 feet from the edge of pavement). The 60 dBA contours are generally much closer to the edge of pavement on County or other City-maintained roadways within the SOI because of the lower traffic volumes on those road segments and the acoustical and topographical characteristics of the rural areas they traverse. The exact location of the 60 dBA contour varies for each road segment depending on traffic volume and topography.

Vehicular traffic noise levels were selectively measured throughout the project study area during the morning and afternoon on Friday, August 26, 2006. Observed vehicular traffic during the investigation of the project area varied from light to heavy depending on where the noise measurement was taken. A total of nine measurement locations were chosen throughout the project study area (refer to Figure V.J.-1). As would be expected, the more heavily trafficked roads within and surrounding the city generally coincide with louder noise levels. Noise measurements were taken at three locations along West Jayne Avenue (Highway 33), two locations along the southwestern project boundary on West Elm Avenue (Highway 198) near Firestone Avenue and Alcalde Road, two locations in the northern project boundary on East Elm Avenue and Oil City Road (Highway 33/198), one location on Phelps Avenue, and one location along Fresno-Coalinga Road (Highway 33/198). Noise monitoring locations were at distances of approximately 100 feet from the center of pavement, and the traffic volumes observed are bi-directional cumulative for all vehicle types. Measured vehicular noise levels are summarized in Table V.J.-1.

TABLE V.J.-1
Measured Noise Levels (Automobile Sources)
August 26, 2006

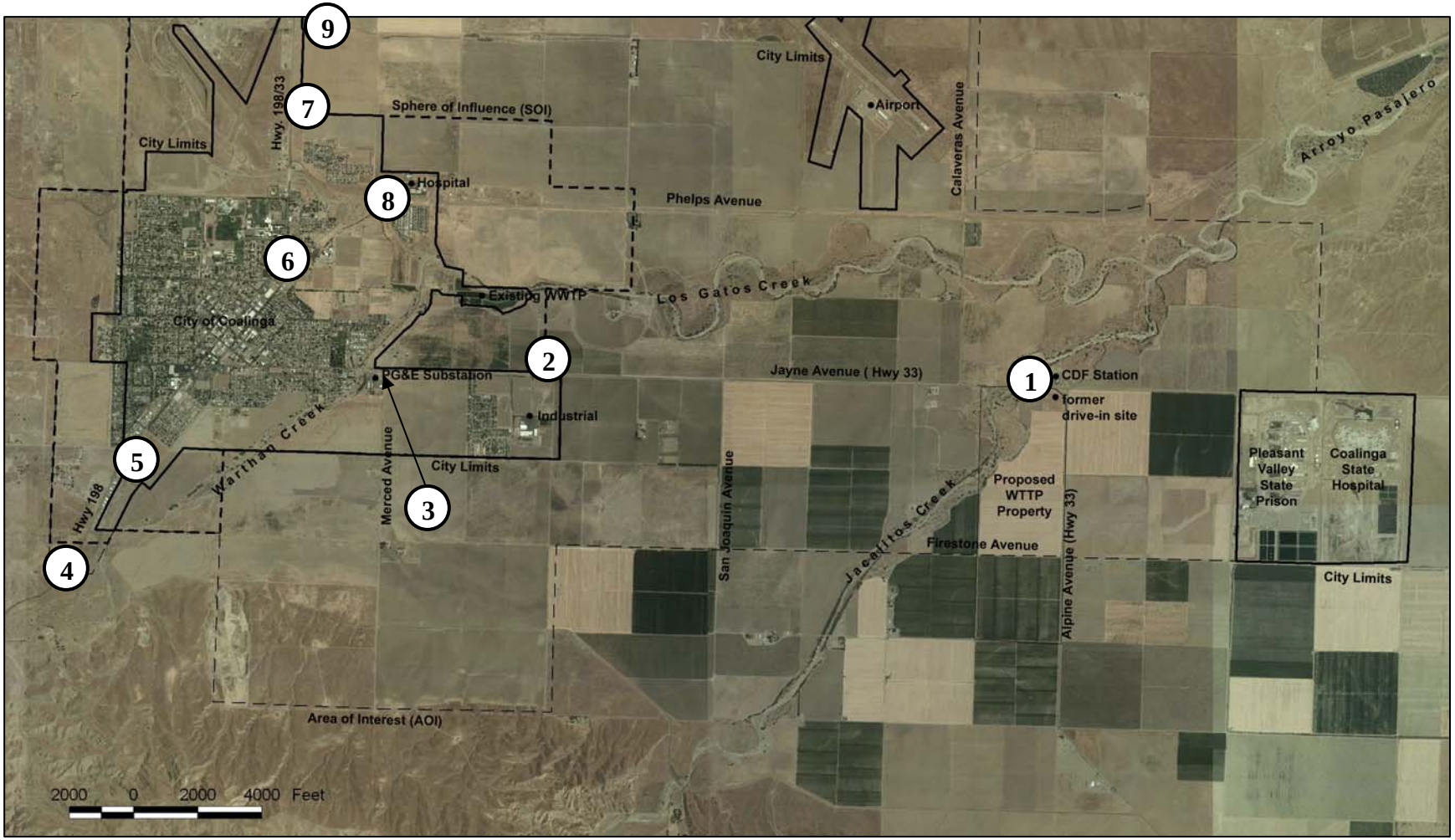
Location	Period of Measurement	Noise Levels (dBA)			Traffic Volumes		
		L_{eq}	Max	Min	Measurement Location	Number	Veh/hr
1	9:30 AM – 9:45 AM	65.6	74.7	48.6	Jayne Ave. (HWY 33)	220	880
2	10:00 AM – 10:15 AM	64.2	88.8	58.4	Jayne Ave. (HWY 33)	208	832
3	10:30 AM – 10:45 AM	64.0	85.9	53.8	Jayne Ave. (HWY 33)	210	840
4	11:00 AM – 11:15 AM	54.1	81.2	49.5	W Elm Ave. (HWY 198)	116	464
5	11:45 AM – 12:00 PM	52.3	62.4	46.7	W Elm Ave. (HWY 198)	103	412
6	12:15 PM – 12:30 PM	65.3	88.1	62.7	E Elm Ave. (HWY 33/198)	360	1,440
7	1:00 PM – 1:15 PM	69.1	65.6	47.0	E Elm Ave. (HWY 33/198)	282	1,128
8	1:45 PM – 2:00 PM	51.3	66.4	42.7	Phelps Ave.	77	308
9	2:15 PM – 2:30 PM	66.5	86.2	52.5	Fresno-Coalinga Ave. (HWY33/198)	280	1,120

(b) Railroad Noise

A spur line of the former the Southern Pacific Transportation Company Railroad passes through the city generally in an east-west direction. This portion of the rail line has been decommissioned; therefore rail noise has been determined to be insignificant.

(c) Aircraft Noise

Airport noise was assessed through the use of established noise contours found in the recently updated Airport Master Plan. The updated Airport Land Use Plan (ALUP) provides noise contour data produced by Aries Consultants, which were based on runway buildout volumes provided by the Coalinga Regional Airport. The Airport noise contours as shown in Figure 7 of the Initial Study prepared for the Airport Master Plan indicate that the 50 dBA through 65 dBA CNEL noise contours do not extend beyond the airport boundaries into the proposed SOI. Therefore, airport noise was determined not to be significant for the SOI area.



(1) Noise Measurement Location

NORTH
Not to Scale

City of Coalinga 2025 General Plan Update
Noise Measurement Locations
FIGURE V.J.-1

2) Stationary Noise Sources

Stationary noise control issues focus upon two objectives: to prevent the introduction of new noise-producing uses in a noise sensitive area, and to prevent encroachment of noise-sensitive land uses upon existing noise-generating facilities. The City attempts to achieve these objectives by applying performance standards and by requiring that new noise-sensitive uses in proximity to existing noise sources include receiver-based mitigation measures.

The primary sources of stationary noise within the existing city limits (contiguous and non-contiguous parcels) and the SOI area would include many existing and planned industrial, commercial and agricultural processes. Significant existing stationary noise sources include but are not limited to operations at the Coalinga Gravel Pit, PG&E Electrical Substation, West Hills College, several industrial areas, and various downtown commercial facilities.

Other stationary noise sources near the SOI eastern boundary include the Pleasant Valley State Prison and the Coalinga State Hospital. Although these facilities can occasionally produce loud noise episodes (firing range, prison yard, etc.), they are located outside of the SOI boundary and are non-contiguous city parcels and would not be considered a significant noise source. The newly planned City Waste Water Treatment Plant would be located approximately one mile away to the southwest of the prison facility on Jayne Avenue. According to the certified EIR for that project (SCH#2005021139), noise levels from future operation of the WWTP site could potentially exceed existing City thresholds, but the EIR contains mitigation measures that reduce potential noise impacts to a level of insignificance.

Federal and State employee health and safety regulations (OSHA and CalOSHA) control noise production within an industrial or commercial facility or in close proximity to many types of agricultural equipment. However, exterior noise emissions from such operations have the potential to exceed locally acceptable standards at nearby noise-sensitive land uses.

2. Regulatory Setting

Noise is regulated at the federal, state and local levels through regulations, policies and/or local ordinances. Local policies are commonly adaptations of federal and state guidelines, based on prevailing local conditions or special requirements.

a. Federal Policies and Regulations

1) Congressional

The Federal Noise Control Act of 1972 §2 [42 U.S.C. 4091] states the following:

> *(a) The Congress finds (1) that inadequately controlled noise presents a growing danger to the health and welfare of the Nation's population, particularly in urban areas; (2) that the major sources of noise include transportation vehicles and equipment, machinery, appliances, and other products of commerce; and (3) that, while primary responsibility for control of noise rests with State and local governments, Federal action is essential to deal with major noise sources in commerce control of which require national uniformity and treatment.*

> *(b) The Congress declares that it is the policy of the United States to promote an environment for all Americans free from noise that jeopardizes their health or welfare. To that end, it is the purpose of this Act to establish a means for effective coordination of Federal research and activities in noise control, to authorize the establishment of Federal noise emission standards for projects distributed in commerce, and to provide information to the public respecting the noise emission and noise reduction characteristics of such products.*

2) Federal Highway Administration

23 CFR 772 provides procedures for conducting highway-project noise studies and implementing noise-abatement measures to help protect the public health and welfare, supply Noise Abatement Criteria (NAC), and establish requirements for information to be given to local officials for use in planning and designing highways. Under this regulation, noise abatement must be considered if the project is predicted to result in a traffic-noise impact. A traffic-noise impact is considered to occur when the project results in a substantial noise increase or when the predicted noise levels approach or exceed NAC specified in the regulation (refer to Table V.J.-2). 23 CFR 772 does not specifically define what constitutes a substantial increase or the term approach; rather, it leaves interpretation of these terms to the states.

TABLE V.J.-2
Activity Categories and Noise Abatement Criteria

Activity Category	NAC, Hourly A-Weighted Noise Level, dBA L_{eq}(h)	Description of Activities
A	57, Exterior	Lands on which serenity and quiet are of extraordinary significance and serve an important public need and where the preservation of those qualities is essential if the area is to continue to serve its intended purpose.
B	67, Exterior	Picnic areas, recreation areas, playgrounds, active sport areas, parks, residences, motels, hotels, schools, churches, libraries, and hospitals.
C	72, Exterior	Developed lands, properties, or activities not included in Categories A or B above.
D	---	Undeveloped lands.
E	52, Interior	Residences, motels, hotels, public meeting rooms, schools, churches, libraries, hospitals, and auditoriums.

Source: Caltrans 1998b.

b. State and Local Policies and Regulations

1) California Government Code

The contents of General Plan Noise Elements and the methods used in their preparation have been determined by the requirements of §65302(f) of the California Government Code and by the *Guidelines for the Preparation and Content of the Noise Element of the General Plan* prepared by the California Department of Health Services and included in the 1900 State of California General Plan Guidelines. The General Plan Guidelines require that major noise sources and areas containing noise-sensitive land uses be identified and quantified by preparing generalized noise exposure contours for current and projected conditions. Contours may be prepared in terms of either the Community Noise Equivalent Level (CNEL) or the Day-Night Average Level (L_{dn}), which are descriptors of total noise exposure at a given location for an annual average day. The CNEL and L_{dn} are generally considered to be equivalent descriptors of the community noise environment within plus or minus 1.0 dB.

2) City of Coalinga

The City of Coalinga General Plan Noise Guidelines and Standards provides a policy framework within which potential noise impacts may be addressed during project review and long range planning. The Guidelines and Standards contain policies, performance goals, and procedures for addressing identified noise impacts. The City Guidelines and Standards also set noise exposure standards for noise sensitive land uses, and performance standards for new commercial and industrial uses. Noise standards are established in the Guidelines and Standards for sensitive noise receptors. Noise standards usually apply to evaluating planned residential developments located along highways, arterial routes, frontage roads, railroad tracks, and stationary noise sources where planned or existing residential developments or noise sensitive land uses would be adversely affected by existing or increased project-related noise levels in the area.

3. Thresholds of Significance

The significance of potential noise impacts are based on thresholds identified within Appendix G of the CEQA *Guidelines* and standards established within the city of Coalinga General Plan Noise Guidelines and Standards. The actual degree of impact is difficult to ascertain because of the highly subjective character of individuals' reactions to changes in the noise environment.

a. CEQA Guidelines

Appendix G of the CEQA *Guidelines* provides the following thresholds for determining significance with respect to noise. Noise impacts would be considered significant if the proposed project would result in:

a. Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies;

b. Exposure of persons to of generation of excessive ground borne vibration or ground borne noise levels;

c. A substantial increase in ambient noise levels in the project vicinity above levels existing without the project;

d. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

b. City of Coalinga General Plan Noise Guidelines and Standards

The Guidelines and Standards do not establish separate thresholds for transportation and stationary noise. The following paragraph summarizes the standards identified in the Guidelines and Standards that are applicable to the proposed SOI area. Any exceedance of an established standard in the City's General Plan would be considered a significant impact.

The applicable City standards for evaluating noise impacts from transportation noise is generally 60 dBA (L_{dn}) for outdoor activity areas and 45 dBA (L_{dn}) for interior spaces where residential land uses are proposed. Outdoor activity areas would include patios, backyard recreation areas, etc., but not the front yards of residences that extend to the edge of the roadway in most circumstances.

Table V.J.-3 from the existing General Plan provides established Noise/Land Use Guidelines for new development within City jurisdiction. According to these guidelines, noise levels up to 60 dBA CNEL or Ldn are "normally acceptable" for noise sensitive uses such as residences and hospitals.

The applicable policies of the Noise Guidelines and Standards include the following:

> *Land Use & Transportation Noise Source:* Table V.J.-3 shall be used to determine the appropriateness of designating land for noise sensitive uses, considering noise exposure from transportation sources. Table V.J.-3 shows the ranges of noise exposure that are considered to be acceptable, conditionally acceptable, or unacceptable for various land uses.
>
> In **acceptable** noise environments, development may be permitted without requiring specific noise studies or specific noise reducing features.
>
> In **conditionally acceptable** noise environments, development should be permitted only after noise mitigation has been designed as part of the project, to reduce noise exposure to the levels specified by the following policies. In theses areas, further studies may be required to characterize the actual noise exposure and appropriate means to reduce it.
>
> In **unacceptable** noise environments, development in compliance with the policies generally is not possible.

TABLE V.J.-3
Land Use Compatibility for New Development

Land Use	Exterior Noise Exposure, Ldn or CNEL (dB)					
	55	60	65	70	75	80
Residential – Low Density, Single Family, Mobile Homes						
Residential Multi-Family						
Bed and Breakfast, Hotel, Motel						
Schools, Libraries, Museums, Hospitals, Churches, Nursing Homes						
Auditoriums, Concert Halls, Amphitheatres						
Outdoor Sports, Recreation						
Playgrounds, Neighborhood Parks						
Golf Courses, Riding Stables, Water Recreation, Cemeteries						
Business, Commercial, Professional						
Industrial, Manufacturing, Utilities, Agriculture						

Acceptable, no mitigation required
Conditionally Acceptable, Mitigation required
Normally Unacceptable, mitigation may not be feasible
Clearly Unacceptable

Source: City of Coalinga, General Plan, 1994

4. Impact Assessment and Methodology

a. Transportation Noise Assessment

1) Vehicle Traffic

The eastern SOI area along Jayne Avenue (Highway 33) is currently subject to significant vehicle traffic during peak periods throughout the day. These trips are generally considered to result from the new Pleasant Valley State Prison and the Coalinga State Hospital located near the corner of Alpine and Jayne Avenue. Significant traffic noise also occurs during peak periods within the downtown area and north along East Elm Avenue (Highway 198). East Elm Avenue experiences heavy truck traffic volumes due the daily operations at the Coalinga Pit sand and gravel operation. Generally speaking, doubling the traffic volume will produce a three dB

increase in the ambient noise environment under normal free-flow traffic conditions. In the case of a distinct downtown area like the city of Coalinga, there is a physical limit to the amount of automobiles that can actually occupy the queuing space at stoplights and intersections. Once volume saturation occurs, the noise environment will reach a theoretical maximum level and sustain that level as long as the vehicle volume stays the same. The effect is that as more vehicles are added to a saturated traffic condition, a maximum theoretical noise level will be reached but it will be sustained for longer periods of time, thereby affecting the hourly Leq and Ldn noise levels.

(d) Peak-hour Leq

The procedure for assessing vehicular traffic noise impacts included measuring the peak-period noise levels at select locations throughout the SOI area while counting the traffic generating the noise during the period of measurement. The measured noise levels are then adjusted logarithmically to determine the "future" noise levels by using the estimated traffic volume predictions for various road segments. Logarithms are used because they produce linear correlations, which can then be used to more readily evaluate future noise levels.

From a practical standpoint, the peak-hour Leq noise level is essentially equivalent to the Ldn noise level (generally yielding results within 0.5 dBA of each other). The Ldn is the standard measure used for evaluating community noise impacts in the City Noise Element. For most situations involving noise originating from vehicular traffic, the peak-hour Leq can be used as the Ldn level, avoiding the need and cost for 24 hours of continuous noise measurements. Peak hour Leq was the methodology used in evaluation of traffic noise impacts for the SOI area. Noise measurements were taken for a duration of fifteen-minutes at each location, and hourly traffic counts were derived by multiplying the 15-minute traffic count by four. Further analysis is based on the average noise levels (Leq) as discussed in this report.

(e) Traffic Noise Model 2.5

Used in conjunction with existing traffic noise measurements, future anticipated traffic volumes provided by K.D. Anderson (EIR Traffic Consultants) for State Route 33 and 198 was entered into the FHWA's Traffic Noise Model Version 2.5 (TNM 2.5). TNM 2.5 is a computer-modeling program that computes highway traffic noise at nearby sensitive receivers and aids in the design of highway noise barriers. TNM 2.5 was used to help determine buildout traffic noise contours within the SOI area. TNM 2.5 is a powerful noise-modeling program, but it does have limitations. TNM 2.5 does not calibrate existing background noise conditions into its modeled output; the user must do this procedure externally if warranted. TNM 2.5 models future noise levels based on user inputted traffic data, topographical conditions, shielding conditions (i.e. terrain features, ground cover, tree zones, building rows, etc.). In addition, TNM 2.5 does not allow for inputting stationary noise sources or other noise producing sources that may affect the overall noise environment in a project area. This leads to TNM 2.5 predictions that can sometimes under-estimate noise levels in certain cases where the noise environment is more complex than just from a roadway. Despite this, TNM 2.5 is a useful noise prediction tool that can help to make good noise predictions along heavily traveled road segments within the proposed General Plan SOI.

b. Stationary Noise Assessment

The City Noise Element states that new development of noise-sensitive land uses shall not be permitted where the noise level due to existing stationary noise sources will exceed the noise level standards of Table V.J.-3 unless effective noise mitigation measures have been incorporated into the design of the development to reduce noise exposure to or below the levels specified in Table V.J.-3.

5. Impacts Discussion and Proposed Mitigation Measures

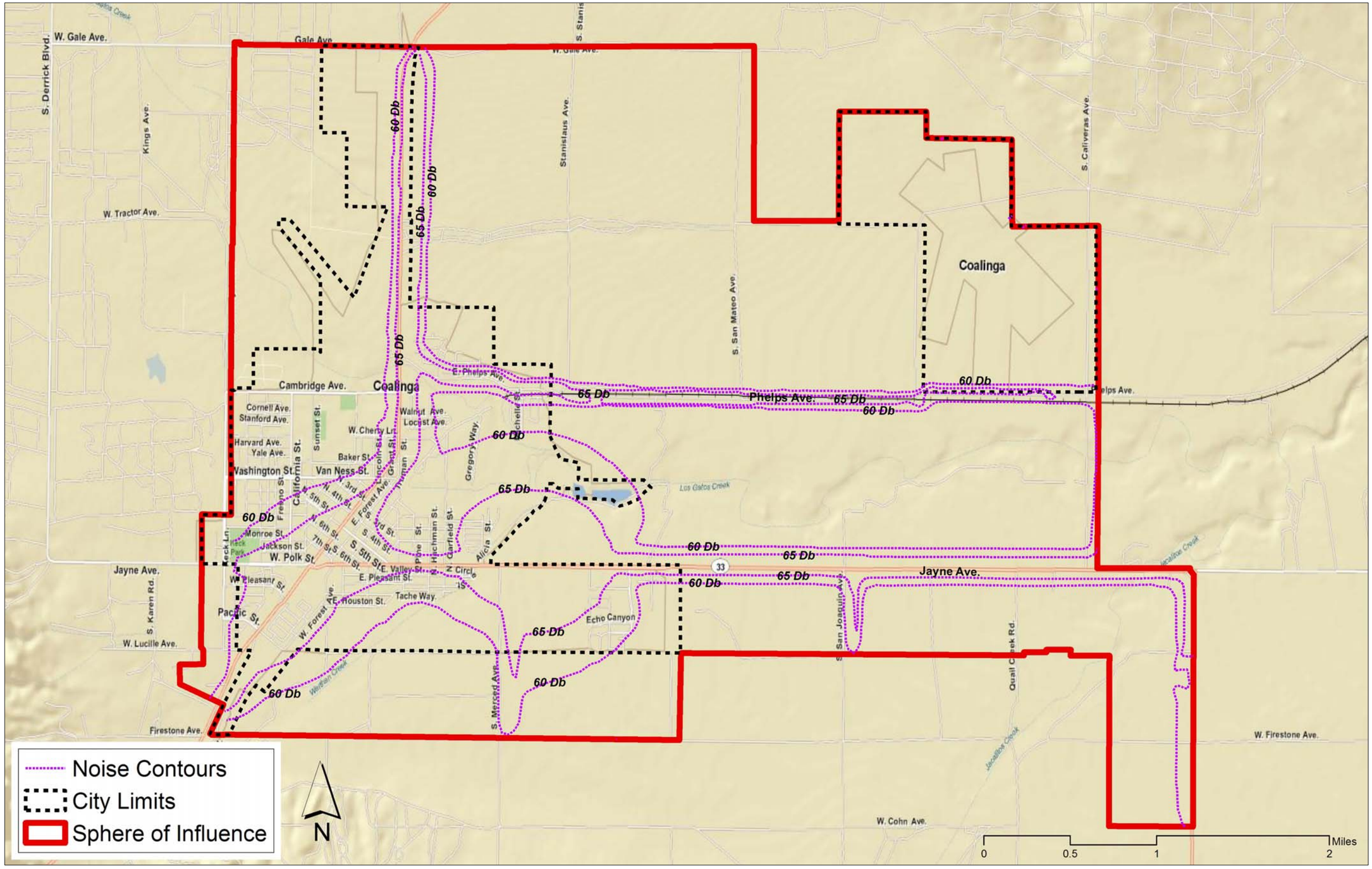
N Impact 1 Implementation of the proposed General Plan would result in exposure of sensitive receptors to outdoor noise levels greater than 60 dBA Leq associated with vehicle traffic.

Noise from traffic is currently the largest noise source in the city and is anticipated to be the largest noise source in the future. Traffic noise impacts would occur due to increased vehicular trips that would result from future development that would be using the city roadway network. The proposed General Plan would directly increase the amount of commercial and industrial development in the city. For residential land uses, it is estimated that each new dwelling unit would add approximately eight vehicle trips per day, which in turn would lead to increased noise levels along existing and future city transportation corridors. Future noise levels resulting from increased traffic anticipated in the proposed General Plan are illustrated below in Table V.J.-4 and shown in Figure V.J.-2. The contours in Figure V.J.-2 are for general use, they do not include the shielding effects that buildings may have on noise levels. Project-specific noise analysis will be necessary to determine site-specific impacts.

TABLE V.J.-4
Future Noise Levels[1]

Location	Road Segment	Existing Traffic (ADT)[2]	Buildout Traffic (ADT)[2]	Noise Level Increase (dBA)	Predicted Buildout Noise Levels (dBA)
1	Jayne Ave. (HWY 33)	7,100	21,000	4.7	70.3
2	Jayne Ave. (HWY 33)	7,100	29,800	6.2	70.4
3	Jayne Ave. (HWY 33)	7,850	32,990	6.2	70.2
4	W Elm Ave. (HWY 198)	1,500	2,900	2.9	57.0
5	W Elm Ave. (HWY 198)	5,100	11,600	3.6	55.9
6	E Elm Ave. (HWY 33/198)	8,300	17,500	3.2	68.5
7[3]	E Elm Ave. (HWY 33/198)	4650	26,500	7.6	76.7
8	Phelps Ave.	4100	17,450	6.3	57.6
9	Fresno-Coalinga Ave. (HWY33/198)	4500	26,900	7.8	74.3

[1] *Based on existing and buildout ADT traffic volumes.*
[2] *K.D. Anderson & Associates (2006)*
[3] *It is anticipated that the capacity of this intersection would be exceeded before a noise level increase of 7.6 could be reached.*



Source P:\2005\05-414 Coalinaa Master Plan EIR\GIS\Fiaure N-2

Noise Contours
FIGURE V.J.-2

Back of Figure V.J.-2

Mitigation Measures in the Proposed General Plan
Policies and implementation measures that reduce impacts to a less than significant level have been included in the proposed General Plan and are listed as follows:

N1-1 The City shall ensure noise mitigation measures and techniques are incorporated into site planning, architecture, design, and construction projects. Associated Implementation Measures include: 1-1.1 through 1-1.7.

N1-2 The City shall ensure acceptable noise levels near sensitive noise receptors including schools, hospitals, convalescent homes and other noise-sensitive areas. Associated Implementation Measures include: 1-2.1 through 1-2.5.

Residual Impact
With implementation of these policies, impacts would be considered *less than significant.*

N Impact 2 Implementation of the proposed General Plan would potentially result in the construction of noise-sensitive land uses near existing or planned stationary noise sources.

Development of residential or other noise-sensitive uses in the vicinity of commercial and industrial areas could result in a significant stationary noise related impact. Nuisance noise from a variety of stationary sources would be expected from existing or planned commercial and industrial development. Stationary noise impacts would occur under the proposed General Plan if future development were to be constructed in the vicinity of existing or planned commercial industrial facilities. As land use categories have been established over time, their relationship and compatibility for noise impacts between different land use categories were evaluated at the time they were approved (e.g. land use ordinance, area plan updates, etc.). Almost all projects including loud stationary noise components will be discretionary and subject to review and mitigation for noise impacts.

Mitigation Measures in the Proposed General Plan
The proposed City Noise Element includes a process for new noise-sensitive developments to follow to achieve acceptable noise levels. Implementation of Policies N1-1 and N1-2 above will reduce potential noise impacts to less than significant levels.

Residual Impact
With implementation of these policies, impacts would be considered *less than significant.*

N Impact 3 Construction of individual projects could temporarily produce noise levels ranging from 70 to 95 dBA at 50 feet from the source, potentially affecting adjacent sensitive land uses.

Construction noise from implementation of the General Plan could have significant noise impacts on adjacent noise-sensitive land uses. In general, the grading phase of project construction tends to create the highest noise levels because of the operation of heavy equipment. Construction noise would be a short-term impact for any individual project. Other than limiting

noisy activities to certain times and days of the week, the City currently has no noise threshold for temporary construction related impacts. However, noise reduction plans are implemented on a case-by-case basis as warranted. In the event that significant noise would result due to long-term construction projects or unique situations where significant short-term noise impacts are identified, a noise reduction plan should be prepared.

Mitigation Measures in the Proposed General Plan
Implementation of Policies N1-1 and N1-2 above will reduce potential noise impacts resulting from construction activities.

Residual Impact
With implementation of these policies, impacts would be considered *less than significant.*

6. Cumulative Impacts

Implementation of the proposed General Plan has the potential to result in significant short-term construction and long-term operational noise impacts. Although not all of the proposed development will occur concurrently, the inclusion of all projects will more than likely exceed noise standards defined in the proposed City Noise Element. In addition, construction activities have the potential to produce significant temporary short-term emissions.

Future development in the SOI area would potentially result in noise impacts to residential and other noise sensitive developments. These impacts could occur as a result of traffic related impacts from increased vehicle trips resulting from dense residential developments or from vehicles delivering merchandise or materials to retail facilities. The actual occurrence of such impacts would depend on the location and design of the proposed project, the vehicle traffic generated, distance to existing major city roadways or significant stationary noise sources, and potentially the volumes/hours of deliveries to retail facilities. It is expected that these cumulative noise impacts will be less than significant assuming implementation of the proposed policies and mitigation measures described above.

K. AIR QUALITY

This section of the MEIR addresses potential impacts resulting from implementation of the proposed General Plan on air quality, and has been prepared based on the information provided by the San Joaquin Valley Unified Air Pollution Control District (SJVUAPCD) and the California Air Resources Board (CARB).

1. Environmental Setting

a. Criteria Air Pollutant

The federal Clean Air Act Amendments of 1970 established national ambient air quality standards for criteria pollutants to protect public health and welfare. National standards have been established for ozone, carbon monoxide, nitrogen dioxide, sulfur dioxide, particulate matter and lead. These standards for pollutants are more pervasive in the environment and have been established for each of them to meet specific public health and welfare criteria. Individual states may adopt more stringent standards for criteria pollutants and include other pollutants.

Ozone - The most widespread air quality problem in the state, ozone is a colorless gas with a pungent, irritating odor. Ozone is not emitted directly into the atmosphere but is primarily formed through the reaction of hydrocarbons and nitrogen oxides in the presence of sunlight. Ozone's health effects can include reduced lung function; aggravated existing respiratory illness; and irritated eyes, nose, and throat. Chronic exposure can cause permanent damage to the alveoli of the lungs. Ozone can persist for many days after formation.

Respirable Particulate Matter – This is a class of compounds that can lodge deep in the lungs causing health problems. Based on extensive health studies, particulate matter is regulated under two classes: PM10, which is the fraction 10 microns or smaller, and PM2.5, two and a half microns or smaller. Respirable particulate matter can range from inorganic wind-blown soil to organic and toxic compounds found in fireplace smoke.

Nitrogen dioxide (NO_2) - A reddish-brown gas with an irritating odor, nitrogen dioxide is emitted from motor vehicles, industrial facilities, and power plants. In the summer months NO_2 is a major component of photochemical smog. At ambient concentration levels nitrogen dioxide is an irritating gas that may constrict the airways of asthmatics and increase the susceptibility to infection in the general population.

Carbon Monoxide - A colorless, odorless gas, carbon monoxide is a byproduct of incomplete combustion and is emitted directly into the atmosphere. Carbon monoxide concentrations typically peak nearest a source, such as roadways, and decrease rapidly as distance from the source increases. Carbon monoxide is readily absorbed into the body from the lungs. It decreases the capacity of the blood to transport oxygen, leading to health risks for unborn children and people suffering from heart and lung disease. The symptoms of excessive exposure are headaches, fatigue, slow reflexes, and dizziness. Symptoms may occur in healthy people.

Sulfur Dioxide - A colorless gas with a strong, suffocating odor, sulfur dioxide is primarily a combustion product of coal, fuel oil, and diesel fuel. Sulfur dioxide can trigger constriction of the airways, causing particular difficulties for asthmatics. Long-term exposure is associated with increased risk of mortality from respiratory or cardiovascular disease

California first established air quality standards. Federal standards came later and did not address California's unique meteorological conditions and associated air quality problems. The considerable diversity between state and federal standards in effect are shown in Table V.K.-1. These ambient air quality standards incorporate a margin of safety and are designed to protect those segments of the public most susceptible to respiratory distress.

b. Toxic Air Contaminants

Toxic Air Contaminants (TAC) are compounds known to cause cancer, mutation, or other serious health problems and they are regulated separately from criteria air pollutants. There are hundreds of different types of TACs with varying degrees of toxicity. Sources of toxic air contaminants include industrial processes, commercial operations (e.g., gasoline stations and dry cleaners), and motor vehicle exhaust. Unlike regulations concerning criteria air pollutants there are no ambient air quality standards for evaluation of toxic air contaminants based on the amount of emissions. Instead emissions of TACs are evaluated based on the degree of health risk that could result from exposure to these pollutants.

c. Topography and Climate

The land's terrain, or topography, and the daily and seasonal changes in wind and temperature have profound effects on local pollutant levels.

The ARB has divided California into regional air basins according to their topographic air drainage features. The San Joaquin Valley Air Basin (SJVAB) is approximately 250 miles long and averages 35 miles wide, and is the second largest air basin in the state. The SJVAB is highly susceptible to pollutant accumulation over time. The surrounding mountains are predominantly above the normal height of summer inversion layers (1,500-3,000 feet). Local climate, including wind speed and direction, temperature, inversion layers, precipitation, and fog can exacerbate the existing air quality problems in the SJVAB.

Coalinga has an "inland Mediterranean" climate averaging over 260 sunny days per year. The area is characterized by warm, dry summers and cooler winters. The average annual precipitation in Coalinga is about 8.3 inches. Precipitation in the SJV is strongly influenced by the position of the semi-permanent subtropical high-pressure belt located off the Pacific coast (Pacific High). In the winter, this high-pressure system moves southward, allowing Pacific storms to move through the SJV. These storms bring in moist, maritime air that produces considerable precipitation on the western up-slope side of the Coast Ranges. Between winter storms, low wind speeds combined with strong inversion layers is conducive to high localized pollutant concentrations, especially respirable particulate matter. Temperatures in winter typically range from and 38 ºF at night to 58 ºF in the daytime.. Maximum particulate concentrations tend to occur on clear, cold nights when a strong surface inversion is present and large numbers of fireplaces are in use.

During the summer, wind usually originates at the north end of the SJV and flows in a south-southeasterly direction, through Tehachapi pass, and then into the Southeast Desert Air Basin. Because it typically does not rain and the sky is clear, strong sunlight drives the formation of ozone smog. Summer temperatures typically range from a low of 65 ºF at night to a high around 100 ºF. During summer the strong sunlight and warm temperatures favor ozone smog formation. The air basin typically has some of the worst air quality in the nation because of the trapping nature of the topography and substantial emission sources.

d. Topography and Climate

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TABLE V.K.-1
National Ambient Air Quality Standards

Pollutant	Averaging Time	California Standards[1]	National Standards[2]	
		Concentration[3]	Primary[3,4]	Secondary[3,5]
Ozone (O_3)	1 Hour	0.09 ppm (180 µg/m^3)	None[6]	Same as Primary Standard
	8 Hour	0.070 ppm	0.075 ppm (147µg/m^3)	
Fine Particulate Matter ($PM_{2.5}$)	24 Hour	No California Standards	35 µg/m^3	Same as Primary Standard
	Annual arithmetic mean	12 µg/m^3	15 µg/m^3	
Respirable Particulate Matter (PM_{10})	24 Hour	50 µg/m^3	150 µg/m^3	
	Annual arithmetic mean	20 µg/m^3	-----	
Carbon Monoxide (CO)	8 Hour	9.0 ppm (10 mg/m^3)	9 ppm (10 mg/m^3)	-----
	1 Hour	20 ppm (23 mg/m^3)	35 ppm (40 mg/m^3)	
Nitrogen Dioxide (NO_2)	Annual arithmetic mean	0.030 ppm (57µg/m^3)	0.053 ppm (100 µg/m^3)	Same as Primary Standard
	1 Hour	0.18 ppm (339 µg/m^3)	-----	
Lead	30 day average	1.5 µg/m^3	-----	-----
	Calendar quarter	-----	1.5 µg/m^3	Same as Primary Standard
Sulfur Dioxide (SO_2)	Annual arithmetic mean	-----	0.030 ppm(80 μg/m^3)	-----
	24 Hour	0.04 ppm (105 μg/m^3)	0.14 ppm (365 μg/m^3)	-----
	3 Hour	-----	-----	0.5 ppm (1300 μg/m^3)
	1 Hour	0.25 ppm (655 μg/m^3)	-----	-----
Visibility Reducing Particles	8 Hour (10 am to 6 pm, PST)	Insufficient amount to produce an extinction coefficient of 0.23 per kilometer – visibility of ten miles or more due to particles when the relative humidity is less than 70 percent.	No National Standards	

Pollutant	Averaging Time	California Standards[1]	National Standards[2]	
		Concentration[3]	Primary[3,4]	Secondary[3,5]
Sulfates	24 Hour	25 μg/m^3		
Hydrogen Sulfide	1 Hour	0.03 PPM (42 μg/m^3)		

[1] California standards for ozone, carbon monoxide, sulfur dioxide (1- and 24-hour), nitrogen dioxide, respirable particulate matter (PM_{10}), and visibility reducing particles, are values that are not to be exceeded. All others are not to be equaled or exceeded.

[2] National standards, other than ozone, fine particulate matter (PM2.5), and those based on annual averages or annual arithmetic mean, are not to be exceeded more than once a year. The 1-hour ozone standard is attained when the expected number of days per calendar year with maximum hourly concentrations above the standard is equal to or less than one. The 8-hour ozone standard is attained when the fourth highest 8-hour concentration in a year, averaged over three years, is equal to or less than the standard. For PM2.5 the 24-hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard. Contact the U.S. EPA for further clarification and current national Policies.

[3] Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based upon a reference temperature of 25°C and a reference pressure of 760 mm of mercury (1,013.2 millibar). Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 mm of mercury; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.

[4] National Primary Standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health.

[5] National Secondary Standards: The levels of quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.

[6] New national 8-hour ozone and fine particulate matter standards were promulgated by U.S. EPA on July 18, 1997. The national 1-hour ozone standard continues to apply in areas that violated the standard. Contact U.S. EPA for further clarification and current national policies.

Federal one hour ozone National Ambient Air Quality Standards was revoked on June 15, 2005.

Source: CARB Current as of 1 April 2008

e. Atmospheric Stability and Dispersion

Two types of temperature inversions are created in Fresno County: subsidence and radiation. Both types of inversions limit the dispersal of air pollutants within the regional SJV airshed. The more stable the air (low wind speeds, uniform temperatures), the lower the amount of pollutant dispersion. Inversion layers are significant in determining ozone formation and CO and PM_{10} concentrations. Ozone and its precursors will mix and react to produce higher concentrations under an inversion, and inversions trap emitted pollutants like CO. PM_{10} is both directly emitted and created in the atmosphere as a chemical reaction. Daytime temperature inversions during the summer are usually encountered 2,000 to 2,500 feet above the valley floor. Inversions are more persistent (stable) during the winter months. The daily cycle has overnight inversions occurring 500 to 1000 feet above the valley floor.

f. Air Quality Monitoring

The CARB has many duties to perform in its pursuit to acceptable air quality on a statewide basis. One of the most important duties the CARB performs includes monitoring ambient air quality. The CARB has established and maintains, in conjunction with local air pollution control

districts (APCDs) and air quality management districts, a network of sampling stations called the State and Local Air Monitoring (SLAMS) network, which monitor pollutants levels actually present in the ambient air in and around the monitoring station. There are over thirty monitoring stations active in the SJVAB at the time of this EIR; approximately eight are active within Fresno County. The SJVAPCD and ARB add and change monitoring station capability on an ongoing basis. The California Air Resources Board has monitored the gaseous criteria pollutants since 1968. Monitoring is performed to demonstrate attainment or non-attainment of national and state ambient air quality standards.

g. Existing Air Quality

The ARB's role is to identify and classify each air basin in the state on a pollutant-by-pollutant basis. Areas in the state were classified based on severity of air pollution problems. For each non-attainment class, the State specifies air quality management strategies that must be adopted. For all non-attainment categories, attainment plans are required to demonstrate a five-percent-per-year reduction in non-attainment air pollutants or their precursors, averaged every consecutive three-year period, unless an approved alternative measure of progress is developed

h. Attainment Status

From 2005 to 2007 western Fresno County, which includes the city of Coalinga, was in nonattainment of State and Federal standards for ozone, PM-2.5 and PM-10. Refer to Table V.K.-1.

TABLE V.K.-2
Western Fresno County Measured Ambient Concentrations
2005 - 2007

Year	Compound	Standard	Measured	Attainment
2005	Ozone	2nd max one hour	0.131	No
	Ozone	8 hour	0.10	No
	PM2.5	98th percentile	74	No
	PM 10	2 max 24 hour	92	No
2006	Ozone	2nd max one hour	0.130	No
	Ozone	8 hour	0.101	No
	PM2.5	98th percentile	56	No
	PM 10	2 max 24 hour	102	No
2007	Ozone	2nd max one hour	0.114	No
	Ozone	8 hour	0.094	No
	PM2.5	98th percentile	67	No
	PM 10	2 max 24 hour	89	No

Source: SJVAPCD

2. Regulatory Setting

a. Federal Authority

The Environmental Protection Agency (EPA) is responsible for ensuring that states comply with the Federal Clean Air Act and attain national ambient air quality standards (refer to Table V.K.-2). The EPA sets national vehicle emission standards. The EPA has authority under the Clean Air Act to withhold some federal funding and to prepare plans for regions that do not meet attainment deadlines.

b. California Authority

The CARB is allowed to set stricter California standards than those set by the EPA. CARB has authority under the Health and Safety Code to establish ambient air quality standards. The CARB is also authorized to designate attainment classifications for air basins and portions thereof. Districts in air basins that have not met state standards must prepare plans demonstrating the steps they will take to attain the state standards. Plans are not required for the state PM_{10} standard or other pollutants for which there is no federal standard. (Insert a- look for A)

c. Local Jurisdiction

The SJVAPCD was formed in 1991, and it is a separate governmental entity with its own Governing Board. It has jurisdiction over most of the San Joaquin Valley Air Basin: Fresno, Kings, Tulare, Madera, Stanislaus, San Joaquin and Merced Counties, and the Valley portion of Kern County. The District has the primary responsibility for control of air pollution from sources other than motor vehicles and consumer products, which are the responsibility of the California Air Resources Board and EPA.

The SJVAPCD adopted the Guide for Assessing and Mitigating Air Quality Impacts (GAMAQI), and an accompanying Technical Document August 1998. The GAMAQI was revised in 2002 and is used to address attainment of national and State fugitive dust (PM_{10}) and ozone standards. The GAMAQI is a comprehensive planning document intended to provide guidance to the SJVAPCD and other local agencies, including the City of Coalinga, on how to attain and maintain the State standard for ozone and PM_{10}.

3. Thresholds of Significance

In addition, the SJVAPCD Environmental Review Guidelines fulfill CEQA requirements for local agencies to adopt procedures and guidelines for implementing the policies specified within CEQA. The document is intended to guide SJVAPCD staff in carrying out CEQA and to assure the public that environmental impacts related to SJVAPCD actions are thoroughly and consistently addressed.

a. CEQA Guidelines

Appendix G of the CEQA *Guidelines* reccomends the following thresholds for determining significance with respect to air quality. Air quality impacts would be considered significant if the proposed project would:

a. Conflict with or obstruct implementation of the applicable air quality plan;
b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation;
c. Result in cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors);
d. Expose sensitive receptors to substantial pollutant concentrations; or,
e. Create objectionable odors affecting a substantial number of people.

b. SJVAPCD Environmental Review Guidelines

Projects located within the jurisdiction of the SJVAPCD would only cause significant air quality impacts when SJVAPCD rules and regulations are not adequate to address the impact, or if a project is approved that does not comply with all provisions of SJVAPCD rules and regulations, and the impact cannot be mitigated by some other means. Significance thresholds developed by the SJVAPCD include whether or not a project has:

- the potential to cause a local exceedance of any ambient air quality standard;
- the potential to cause a local odor problem;
- the proximity of the source to sensitive receptors;
- the potential to increase the maximum individual cancer risk beyond ten in one million; or,
- the potential to expose people to acutely hazardous air pollutants.

1) GAMAQI Significance of Long-term Operational Emissions

(a) Ozone Precursors

Projects that emit more than ten tons per year of ROG or NOx have a significant air quality impact. Ozone precursor air pollutants in excess of the levels in Table V.K.-3 will be considered to have a significant air quality impact.

(b) Odor Impacts Threshold

While offensive odors rarely cause any physical harm, they can be very unpleasant, often generating citizen complaints to local governments and the SJVAPCD. Any project with the potential to frequently expose members of the public to objectionable odors will be deemed to have a significant impact.

Generators – projects that would potentially generate odorous emissions proposed to locate near existing sensitive receptors or other land uses where people may congregate, and

Receivers – residential or other sensitive receptor projects or other projects built for the intent of attracting people locating near existing odor sources.

Since offensive odors rarely cause any physical harm and no requirements for their control are included in state or federal air quality regulations, the SJVAPCD has no rules or standards related to odor emissions, other than its nuisance rule, Lead Agencies can make a determination of significance based on a review of District complaint records. Significant odor problems are defined as:

- More than one confirmed complaint per year averaged over a three year period, or
- Three unconfirmed complaints per year averaged over a three-year period.

2) Significance of Short-term Construction Emissions

(a) PM10

PM_{10} emissions from construction activities can vary considerably depending on factors such as the level of activity, the specific operations taking place, weather, and soil conditions. The SJVUAPCD emphasizes implementation of effective and comprehensive control measures rather than detailed quantification of construction emissions.

(b) ROG and NOx Emissions from Construction Equipment

Very large construction projects may exceed the annual thresholds for ROG and NOx emissions (10 tons/yr). The SJVAPCD will recommend quantification methods for these projects on a case-by-case basis. In some cases, URBEMIS 8.7 may be used to estimate the emissions. Complex projects may require the use of specific emission factors available from the SJVUAPCD.

(c) Construction-Related Asbestos

Structures requiring demolition often include building materials containing asbestos. Airborne asbestos fibers pose a serious health threat if adequate control techniques are not carried out when the material is disturbed. Most demolitions and many renovations are subject to a CAL-OSHA Certified asbestos inspection prior to start of activity.

4. Impact Assessment and Methodology

Air quality impacts for the proposed General Plan have been determined through all of the following:

- Consultation with the San Joaquin Valley Air Pollution Control District;
- Use of the San Joaquin Valley Air Pollution Control District Guide for Assessing and Mitigating Air Quality Impacts, Technical Document, and the Environmental Review Guidelines; and,
- Use of the Air Quality Element included in the proposed General Plan.

5. Impacts Discussion and Proposed Mitigation Measures

AQ Impact 1 Construction activities from implementation of the proposed General Plan would contribute to violations of standards for Ozone and PM10.

Use of heavy equipment and earth-moving operations during construction activities generate dust and combustion emissions. These materials may have substantial temporary impacts on local air quality. Combustion emissions, primarily NOx, are substantial from using large diesel-fueled scrapers, loaders, dozers, haul trucks, compressors, generators and other heavy equipment. All feasible mitigation measures were applied to calculate the emission levels shown in Table V.K.-2:

TABLE V.K.-3
Estimated Construction Emissions
(Tons per Year)

Year	ROG	NOx	PM10	PM2.5
2010 Unmitigated	21	85	7,184	1,503
Mitigated	14	81	897	189
% Reduction	*32%*	*5%*	*88%*	*87%*
2015 Unmitigated	32	80	7,979	1,669
Mitigated	16	77	1061	224
% Reduction	*51%*	*4%*	*87%*	*87%*
2020 Unmitigated	27	50	8009	1675
Mitigated	11	48	1064	224
% Reduction	*60%*	*4%*	*87%*	*87*
2025 Unmitigated	2	13	6532	1365
Mitigated	2	11	732	153
% Reduction	*21%*	*12%*	*89%*	*89%*

Source: Urbemis 9.2.4 Data rounded to the nearest ton.

Mitigation Measures in Proposed General Plan
The General Plan includes the following policies:

AQ1-1 Air quality impacts associated with new development projects must be considered during the development review process. Associated Implementation Measures include AQ1-1.1 through AQ1-1.9.

AQ4-1 Implement measures that effectively reduce particulate, dust, and other emissions. Associated Implementation Measures include AQ4-1.1 and AQ4-1.2.

The proposed General Plan specifically requires the city to reduce short-term emissions resulting from new construction projects through implementation of a suite of short-term construction mitigation measures (see proposed General Plan Table 5-8). .

SJVAPCD Rule 9510 requires residential and non-residential projects to reduce NO2 and PM1-0 emission significantly below "business as usual." The mitigations in this section will provide a substantial portion of the required reductions.

Residual Impact
Vigorous adherence to SJVAPCD recommendations and implementation and enforcement of City policy, will result in impacts from short-term vehicle and dust emissions from construction projects that should be considered *less than significant.* However, further project specific environmental review will be required to effectively evaluate residual impacts.

AQ Impact 2 Implementation of the proposed General Plan would result in substantial emissions of ozone precursors (NOx, ROG) and other pollutants from mobile, area and stationary sources. These are considered a significant impact.

Mobile Sources
Mobile source emissions (vehicle) emissions occur at all levels of development including residential, industrial, commercial and agricultural developments. Vehicle emissions are not only tied directly to the number of trips, but also to the length of the trips involved. . As a result, air quality plans encourage communities to grow more densely so that the average trip length between a residence and employment centers, grocery stores, etc. is reduced. In recent years the concept of "mixed-use" zoning has been promoted as a way to develop communities where residents can use alternative transportation methods to reach services jobs, etc, reducing traffic congestion and the resulting emissions. These developments combine commercial and residential elements in a single property, e.g., an apartment building with offices or stores.

Area Sources
Emissions from combustion of natural gas and generation of electric power are called area sources. Area source emissions are generated from air conditioners, heaters, fireplaces, pesticides/herbicides, etc. Area source emission would also be would also grow with the population and employment projections of the proposed General Plan.

Because the specific scope and timing of projects that would result from implementation of the General Plan are unknown at this time. Table V.K.-3 provides examples of projects that are likely to approach or exceed ROG and NOx significance thresholds of 10 tons per year if no project-specific mitigation is applied.

TABLE V.K.-4
Typical Developments that Approach or Exceed SJVAPCD Thresholds for Operational (Mobile and Area) Emissions

Land Use	Trip Rate	Development Size	ROG (tons/year)	NOx (tons/year)
Single Family Residential (SFR)	8.79/unit	250 units	9.8	7.9
Residential Multi-Family (RMF)	6.94/unit	300 units	9.7	7.4
General Commercial (GC)	605/acre	6 acres	6.2	9.6

Complete calculation worksheets showing area and mobile emissions for the proposed project were generated using Urbemis 9.2.4, and are in Appendix D. Table V.K.-4 summarizes these emissions and shows the estimated emission reduction using standard URBEMIS mitigation measures..

TABLE V.K.-5
Annual Operational Emissions Year 2025 (Tons)

Emission	ROG	NOx	PM10	PM2.5
Area Source	175	72	1.5	1.5
Mitigated	174	59	1.5	1.5
% Reduction	*<1%*	*18%*	*0*	*0*
Mobile Source	548	798	290	70
Mitigated	498	715	260	63
% Reduction	*9%*	*10%*	*10%*	*10%*
Total Operational Emissions	713	870	292	72
Mitigated	672	774	262	65
% Reduction	*6%*	*11%*	*10%*	*10%*

Stationary Sources
Stationary sources would include facilities in the service industry, such as gasoline service stations or dry cleaning establishments, and other facilities that may be involved with light and heavy industry. In some instances, these sources include manufacturing or food processing facilities, mining facilities, cement plants, or power plants. The SJVAPCD rules and regulations require new stationary sources to be reviewed by the SJVAPCD to minimize emissions. Projects are reviewed on a case by case basis.

Mitigation Measures in the Proposed General Plan
There are a number of policies in the proposed General Plan intended to reduce operational emissions. These policies recognize the benefits of reducing the total number of vehicle miles traveled in the city, increasing the use of alternative transportation, and designing new developments in a way that reduces their energy consumption. The policies are located in the Air Quality and the Circulation Elements and include the following:

C1-6 Shall encourage the use of transportation alternatives that reduce the use of personal vehicles. Associated Implementation Measures include: C1-6.1 through C1-6.3.

C1-7 Shall require that transit service is provided in all areas of Coalinga, so that transit dependent residents of those areas are not cut off from community services, events, and activities. Associated Implementation Measures include: C1-7.1.

C2-1 Promote non-motorized bike and pedestrian circulation facilities to serve all areas of the city and link regional systems, with priority coordination with school, park, transit, and major facilities. Associated Implementation Measures include: C2-1.1 through C2-1.3.

C3-1 Promote installation of additional, distinctive transit stops at key activity areas and encourage covered shelters at new stops that are linked to safe pedestrian and bicycle routes. Associated Implementation Measures include: C3-1.1 through C3-1.6.

AQ1-1 Air quality impacts associated with new development projects must be considered during the development review process. Associated Implementation Measures include: AQ1-1.1 through AQ1-1.9.

AQ2-1 Encourage and support development projects that propose alternatives to standard vehicle trips. Associated Implementation Measures include: AQ2-1.1 through AQ2-1.8.

AQ2-2 Support upgrades and improvements to the transportation system that benefit bicycle, pedestrian, and other non-vehicular forms of circulation. Associated Implementation Measures include: AQ2-2.1 through AQ2-2.7.

AQ4-1 Implement measures that effectively reduce particulate, dust and other emissions. Associated Implementation Measures include: AQ4-1.1 and AQ4-1.2.

Each of these policies includes specific measures created to ensure the policies are implemented. The Climate Change section of this document identifies additional operational mitigations included in the General Plan. These measures provide a reduction in CO2 and are consistent with those recommended by the State Attorney General and the California Air Pollution Control Officers Association (CAPCOA) for addressing Greenhouse Gas Emissions. They would further reduce ROG, NOx, and particulate matter, as well as CO2 emissions. The additional mitigations contained in the Climate Change section are incorporated here by reference. Many of these measures are focused on improving infrastructure for alternative transportation, avoiding auto trips via having goods and services close to residences and work places, and operational efficiency in buildings and the transportation network.

Residual Impact

Given the air quality challenges facing the San Joaquin Valley it is unlikely that these measures will result in impacts that are less than significant after mitigation. Air quality impacts associated with mobile and area emissions should be considered *significant and unavoidable.* Further project specific environmental review will be required to effectively evaluate residual impacts.

AQ Impact 3 Implementation of the proposed General Plan could result in localized violations of the CO, PM10, and PM2.5 standards.

The SJVAPCD suggests that CO ambient air quality standards may be violated in locations where the level of service (LOS) on roads or intersections is E or F. Because of state-level emission controls have reduced CO concentration overt the past 10 to 15 years, CO hot spots are becoming less likely to occur even in areas with roads operating at LOS E or F, however the potential to exceed CO threshold still exists.

Implementation of the proposed General Plan may reduce LOS at some intersection to E or F, (refer to Table TC-3 in the Transportation and Circulation Section) even after recommended mitigation measures have been made. In these areas, congestion and/or heavy traffic could cause CO levels to increase to an unhealthful level, creating what is known as a CO "Hot Spot".

Mitigation Measures in the Proposed General Plan

The proposed General Plan increases the possibility that CO hotpots will occur because it increase the likelihood that the LOS on some roads will fall to LOS E or F. Buildout under the existing General Plan is not expected to result in the LOS falling below a D on local roads. (Refer to Circulation Section). Coordinating with the SJVAPCD to identify when and where Hot Spots may occur is required by the following policy in the proposed General Plan:

AQ1-1 Air quality impacts associated with new development projects must be considered during the development review process. Associated Implementation Measures include: AQ1-1.1 through AQ1-1.9.

AQ4-1.3 Prohibit wood burning appliances and fireplaces are prohibited in new construction and remodels.

This measure avoids winter emissions when particulate matter can build up to unhealthful levels. It provides the following reductions on a daily basis during the indoor heating season (5 months Nov 15 – April 15). Reductions are shown in Table V.K.-5.

TABLE V.K.-6
Daily Emissions Reduction by Woodstove/Fireplace Prohibition in New Construction (lbs.)

Pollutant	Emissions Reduction
PM10	17.5
PM2.5	16.7
NOx	58
CO	164

Source: Urbemis 9.2.7 Air Quality Model

Although total emission values can appear small they actually can have a fairly large benefit, as wood smoke impacts are greatest on cold still nights when pollution levels may already be high. NOx is suspected of having a strong contribution to PM2.5 levels in winter when it contributes to

nitric acid 'artifacts' or condensable gases. Thus, the total particulate matter avoidance may be about 90 lbs per day, with most of these emissions occurring between 6 and 10 pm.

Residual Impact
With implementation of these policies, impacts would be considered *less than significant.*

AQ Impact 4 Implementation of the proposed General Plan could result in placement of sensitive land uses near sources of objectionable odors.

Implementation of the proposed General Plan would include land uses that generate objectionable odors. Objectionable odors would typically be associated with agricultural, industrial, and some commercial uses. The occurrence and severity of odor impacts depends on factors such as the nature, frequency, and intensity of the odor source, the wind speeds and direction, and the sensitivity of the receiver. While offensive odors rarely cause any physical harm, they can be unpleasant and cause distress among the public and generate citizen complaints. Odors in the city of Coalinga and neighboring properties would most likely result from agricultural operations and the proposed new wastewater treatment plant.

The SJVUAPCD's Guide for Assessing and Mitigating Air Quality Impacts provides screening-levels for evaluating potential odor sources depending on the source's distance from potentially odor sensitive land uses (SJVUAPCD GAMAQI, Table 4-2). According to the SJVUAPCD, the land use compatibility and the history of odor complaints for neighboring sources or similar existing sources should be considered along with feasible mitigation measures (including provision of buffer zones) on a project-by-project basis.

Mitigation Measures in the Proposed General Plan
The General Plan includes policies to reduce odor nuisances on a project-by-project basis by coordinating with the SJVUAPCD, and by recognizing that buffers may be necessary in cases where sensitive receptors may be exposed to objectionable odors such as at the urban/agriculture interface. Policies that mitigate potential air quality impacts resulting from the generation of odors included in the proposed General Plan include:

AQ1-1 Air quality impacts associated with new development projects must be considered during the development review process. Associated Implementation Measures include AQ1-1.1 through AQ1-1.9.

AQ3-1 Mitigate impacts from toxic air pollutant emissions and noxious odors from industrial, manufacturing, and processing facilities. Associated Implementation Measures include AQ3-1.1 through AQ3-1.3.

LU6-1 Minimize conflicts between industry and other land uses by concentrating industrial activity within the areas identified on the Land Use Diagram. Associated Implementation Measures include LU6-1.1.

Residual Impact
With implementation of these policies, impacts would be considered *less than significant.*

6. Cumulative Impacts

Implementation of the proposed General Plan along with the inclusion of each individual project may result in unavoidable cumulative air quality impacts. As subsequent projects are evaluated by the City during the development review process, potential air quality impacts can be quantified and project-specific mitigation can be developed. It is unclear at this time whether or not these impacts will be mitigated to a level that is insignificant individually, however it is expected that cumulative impacts will be *significant and unavoidable* even with implementation of the Air Quality Element, given the air quality challenges that already exist in the San Joaquin Valley.

L. AESTHETIC RESOURCES

This section of the MEIR addresses potential impacts resulting from implementation of the proposed General Plan on aesthetic resources.

1. Environmental Setting

The city of Coalinga is located in a broad valley on the eastern side of the coast mountain range, along the western edge of California's Central Valley. The visual setting of the region is characterized by the wide, flat valley floor bounded by rolling foothills primarily to the west and south, which provide a visual backdrop and offer scenic and topographic interest. Coalinga is generally surrounded by rural open space, with agriculture, oil production, quarries, and scattered ranches and residences making up the visual landscape (refer to Figure V.L.-1, Photo 1). The vegetation of the area surrounding the city is generally that of tilled or grazed grassland, orchards and agricultural crops, sparse trees, and windrows. However, Los Gatos, Warthan, and Jacalitos Creeks create vegetated riparian corridors visible through town and the adjacent countryside.

Highways 33 and 198 create the axis for most of the city's urban development. Urban developments include a mix of commercial, residential and industrial zones, and public facilities such as schools and parks. Coalinga has a well-established street tree population and much of the landscaping is mature (refer to Figure V.L.-1, Photo 2). This provides visual continuity for the community. The majority of the structures are one story and reflects a mix of architectural styles (refer to Figure V.L.-2, Photos 3 and 4). The downtown core is a made up of a mix of uses. The core area includes some historic structures (many were destroyed during the 1983 earthquake) and includes tree-lined, pedestrian friendly streets.

The city is laid out on two grid systems, one running north/south and east/west, and one running northwest/southeast and northeast/southwest. Recent residential developments have generally abandoned the grid system and are based on a pattern of curvilinear streets and cul-de-sacs instead. There are no other urbanized areas within the vicinity of the city.

2. Regulatory Setting

The areas evaluated in this EIR are proposed to be within the city limits, SOI, and AOI as proposed in the 2025 Coalinga General Plan (refer to Figure III-3). An indicator of community sensitivity to aesthetic issues can be found in applicable planning policies and guidelines, including the City's Zoning Ordinance, General Plan 2015, the Fresno County General Plan (2000), and the City's proposed General Plan.



PHOTO 1:

View looking south from Phelps Avenue towards agricultural fields and the Jacalitos Hills. Much of the area around the city of Coalinga is dominated by views such as this.



PHOTO 2:

Downtown Coalinga commercial district. Mature trees are common in the downtown core. Most of the buildings are one story.

Photo Documentation
FIGURE V.L.-1



PHOTO 3:

This figure shows a typical residential street within the original Coalinga grid pattern.



PHOTO 4:

This figure shows a more recent residential development on the eastern edge of town.

Photo Documentation
FIGURE V.L.-2

3. Thresholds of Significance

Thresholds of significance from the Fresno County General Plan and the CEQA *Guidelines* were utilized to identify potentially significant impacts to Aesthetic Resources. In addition to comparing the project to relevant policies and standards, this aesthetic resources assessment identified areas that contribute most to the existing quality of views, and if change would occur to that criteria as a result of the project. If a change in visual criteria was identified, the change was analyzed for its potential affect on the existing scenic character.

a. City of Coalinga Thresholds

City of Coalinga planning documents do not contain specific criteria for determining thresholds of significance regarding visual resources.

b. Fresno County General Plan 2000

The Fresno County General Plan (2000) identifies Highway 198 from Interstate 5 to the Monterey County Line, excluding the city of Coalinga, as a Designated Scenic Highway. Scenic highways are highways that traverse land with unique or outstanding scenic quality or provide access to regionally significant scenic and recreational areas.

c. California Environmental Quality Act Thresholds

The significance of potential aesthetic resource impacts are also based on thresholds identified within Appendix G of the CEQA *Guidelines*. According to the *Guidelines*, aesthetic impacts would be considered significant if the proposed project would:

a. Have a substantial adverse effect on a scenic vista.
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.
c. Substantially degrade the existing visual character or quality of the site and its surroundings.
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

4. Impact Assessment and Methodology

This impact assessment focuses on identifying potential project-related impacts associated with implementation of the proposed General Plan, and is based on comparing anticipated areas of development to those areas likely to be valued as visual resources. Impact assessment is general in nature because specific information regarding the location and type of future development is not known at this time.

5. Impacts Discussion and Proposed Mitigation Measures

AE Impact 1 Implementation of the proposed General Plan could significantly impact scenic vistas and natural resources within and adjacent to the city.

A substantial adverse impact to a scenic vista would occur if implementation of the proposed General Plan would significantly degrade the scenic landscape as viewed from public roads, or in particular City-designated scenic roadways, or from other public areas. The scenic landscape for the proposed project is partially defined by the Alcalde Hills to the west and the Jacalitos and Kreyenhagen Hills to the south, as backdrops to the community setting. Other significant landforms include the creek corridors associated with Jacalitos, Warthan and Los Gatos Creeks. The degree of potential impact on scenic vistas varies with factors such as viewing distance, duration, viewer sensitivity, and the visual context of the surrounding area. If new development is not carefully designed, it could significantly impact scenic vistas or degrade the visual quality of the natural areas within and surrounding the city.

Mitigation Measures in the Proposed General Plan
New policies in the proposed General Plan would reduce potential significant impacts. Policies and implementation measures that reduce impacts to a less than significant level have been included in the proposed General Plan and are listed as follows:

OSC 3-1 Recognize agricultural and rural landscapes as important visual resources. Associated Implementation Measures include OSC3-1.1.

OSC 3-2 Encourage preservation and enhancement of views of the Jacalitos Hills, Guijarral Hills and the Kettlemen Hills to the extent possible. Associated Implementation Measures include OSC3-2.1.

OSC 3-3 Encourage protection and enhancement of scenic views adjacent to and visible from public roads and highways, including Highway 198/33, Highway 33/Jayne Avenue and Phelps Avenue. Associated Implementation Measures include OSC3-3.1.

LU1-1 The City shall encourage proposals that preserve and enhance the open, rural small town character and neighborhood quality that makes Coalinga a special place. Associated Implementation Measures include LU1-1.1 through LU1-1.9.

Residual Impact
With implementation of these policies, impacts would be considered *less than significant.*

AE Impact 2 Implementation of the proposed General Plan could detract or degrade the visual setting and character of the city.

Adoption and implementation of the Draft General Plan would increase urban development in the Coalinga area. This new development may be considered “out of character” with the existing Coalinga land use patterns. Buildout of the plan would convert existing rural and agricultural landscapes to more suburban ones. Much of the landscape around Coalinga is flat, and therefore would be noticeable from the major access routes, including Highways 198 and 33, Phelps Avenue and Jayne Avenue.

Mitigation Measures in the Proposed General Plan
The development review process in place in the City will assist in mitigating this impact. In addition, new policies and in the proposed General Plan would reduce potential impacts. One such policy includes a reference to Traditional Neighborhood Design (TND). TND is generally described as a design style that integrates land uses in close proximity to each other and offers a greater variety in type, design, and layout of residential and nonresidential uses. The purpose of TND is to connect people to places by combining alternative housing types with limited office, retail, and civic uses into pedestrian-friendly neighborhoods. Policies and implementation measures that reduce impacts to a less than significant level have been included in the proposed General Plan and are listed as follows:

LU1-1 The City shall encourage proposals that preserve and enhance the open, rural small town character and neighborhood quality that makes Coalinga a special place. Associated Implementation Measures include LU1-1.1 through LU1-1.11

LU2-3 The City shall encourage residential development projects to utilize Traditional Neighborhood Development (TND) and other design principals that foster a sense of neighborhood among residents and a sense of community linkages. Associated Implementation Measures include LU2-3.1 and LU2-3.2.

LU3-1 The City shall encourage commercial development that contributes to the character, attractiveness, well-being, and economic prosperity of the city. Associated Implementation Measures include LU3-1.1 through LU3-1.3.

LU5-2 The City shall enhance the city's historic Downtown Core by creating an efficient, attractive, and pedestrian-oriented area that reflects the city's historic character while providing a diverse mix of uses. Associated Implementation Measures include LU5-2.1 through LU5-2.3.

Residual Impact
With implementation of these policies, impacts would be considered *significant but mitigable, Class II.*

AE Impact 3 Implementation of the proposed Genera Plan could create new sources of light and glare, degrade the visual setting and character of the city, resulting in a significant impact to aesthetic resources (i.e., the night sky).

The project would result in a significant impact if it subjected adjacent viewers to a substantial amount of point-source lighting visibility at night, or if the collective lumination of the project resulted in a noticeable spill-over effect into the nighttime sky, increasing the ambient light over the region. The placement of lighting, source of illumination, and fixture types combined with viewer locations, adjacent reflective elements, atmospheric conditions can affect the degree of change to nighttime views. There are already developments within the city, (i.e., the Airport,

commercial developments, residential developments and public facilities), that generate light and glare at night. Adoption and implementation of the proposed General Plan will increase development in the city, including substantial industrial areas, large residential and commercial developments.

Mitigation Measures in the Proposed General Plan
Policy LU1-1 includes an implementation measure (LU1-1.11) that requires the City to develop guidelines for the preparation of lighting plans. Policies and implementation measures that reduce impacts to a less than significant level have been included in the proposed General Plan, including the following:

LU1.1-11 The City shall develop guidelines for the preparation of lighting plans. In order to minimize light trespass and greater overall light levels in the city, new development and projects making significant parking lot improvements or proposing new lighting shall be required to prepare a lighting plan for review by City planning staff. The guidelines shall include the following provisions for lighting plans:

a. All lighting fixtures shall be shielded so that neither the lamp nor the related reflector interior surface is visible from offsite.
b. All lights to be downcast except where other types of lighting are warranted for public safety reasons.
c. Escape of light to the atmosphere should be minimized.
d. Low intensity, indirect light sources should be encouraged, except where other types of lighting is warranted for public safety reasons.
e. On-demand lighting systems should be encouraged.
f. Mercury, metal halide, and similar intense and bright lights should not be permitted except where their need is specifically approved and their source of light is restricted.

Residual Impact
With implementation of these policies, impacts would be considered *less than significant.*

6. Cumulative Impacts

Cumulative development associated with build out of the proposed General Plan is expected to result in significant, impacts to aesthetic resources including the scenic vistas of surrounding hills, creek corridors and the night sky. Implementation of the policies in the proposed General Plan and subsequent environmental review that will occur during the development review process are expected to reduce impacts to aesthetic resources to a less than significant level.

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M. CLIMATE CHANGE/GREENHOUSE GAS EMISSIONS

This section defines climate change and greenhouse gases and presents the current legislation and programs addressing climate change in California. It also analyzes potential emissions that would result from implementation of the proposed General Plan, including those direct emissions generated by construction activities and use of personal vehicles, and indirect emissions resulting from electricity consumption. Emissions are quantified to the degree feasible. This section also identifies the policies and implementation measures in the plan which would potentially reduce those emissions.

1. Environmental Setting

Climate change refers to any significant change in measures of climate (such as temperature, precipitation, or wind) lasting for an extended period (decades or longer). Climate change may result from:

- Natural factors, such as changes in the sun's intensity or slow changes in the Earth's orbit around the sun;
- Natural processes within the climate system (e.g. changes in ocean circulation);
- Human activities that bring carbon sequestered in the earth to the surface, and then combust it, thus increasing CO_2 levels world-wide. Human activities also create methane and other gases at levels much higher than would occur without man's intervention. Humans also affect the earth's surface and change natural carbon absorption cycles (e.g. deforestation, reforestation, urbanization, desertification, etc.)

a. Greenhouse Gases (GHG)

Greenhouse Gases (GHG) are any gas that absorbs infrared radiation in the atmosphere. GHGs are effective in trapping infra-red radiation which otherwise would have escaped the atmosphere, thereby warming the atmosphere and the earth's surface (including oceans). Water vapor is the most abundant GHG and increases as the planet warms. Without water vapor and other naturally occurring GHGs the earth's surface would be cooler by about 60 degrees F.

The greenhouse effect was discovered by Joseph Fourier in 1824 and was first investigated quantitatively by Svante Arrhenius (a Nobel laureate) in 1896. Studies over the last few decades have created a consensus agreement among the world's scientists that action to reduce emissions was warranted and needed speedy action. Regulatory activities are discussed in sections below.

GHGs, as defined in state law, include the following: carbon dioxide, methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. Carbon Dioxide, or CO_2, is a naturally occurring gas and also a byproduct of burning fossil fuels, land-use changes and some industrial processes. Anthropogenic CO_2 emissions in the last 200 years have raised CO_2 levels by about 80 parts per million and resulted in a warming of about 1 degree Celsius. Atmospheric CO_2 has a lifetime of about 50 to200 years. Methane is a simple hydrocarbon with a global warming potential estimated at 21 times that of CO_2. Methane is produced through anaerobic decomposition of organic materials in an environment without oxygen, agriculture, petroleum

industry (leaks), coal production, and incomplete fossil fuel combustion. Atmospheric methane has a lifetime of about 12 years.

Nitrous Oxide is a powerful greenhouse gas with a global warming potential about 310 times that of CO_2. Major sources of nitrous oxide include agricultural practices, especially the use of commercial and organic fertilizers, fossil fuel combustion, nitric acid production, and biomass burning. Atmospheric N_2O has a lifetime of about 120 years. Various fluorinated compounds have been commercially introduced as alternatives to ozone-depleting substances (commonly refrigerants). These compounds are emitted as byproducts of industrial processes and are also released in manufacturing. They do not significantly deplete the stratospheric ozone layer, but they are powerful GHGs, some having atmospheric persistence of over 1000 years.

b. Global Climate Change

A series of reports issued by the United Nations Intergovernmental Panel on Climate Change, founded in 1988, have synthesized recent scientific studies of climate change (IPCC, 2007). The report shows that global atmospheric concentrations of carbon dioxide, methane, and nitrous oxide have increased markedly as a result of human activities since 1750. Warming of the global climate due to GHGs is unequivocal, as evidenced by increases in air and water temperatures, widespread melting of snow and ice, and rising global average sea level. Most of the increase in global average temperatures since the mid-20th century is very likely due to increases in GHGs from human activities. GHG emissions increased 70 percent between 1970 and 2004.

Long-term climate changes attributed to GHGs have included changes in arctic temperatures and ice thickness, ocean salinity, wind patterns, and the frequency of extreme weather events such as droughts, heavy precipitation, heat waves and tropical cyclone intensity. Continued GHG emissions at current rates would cause further warming and climate change during the 21st century that will be larger than that observed in the 20th century. Climate change impacts will vary regionally and it may be very expensive for human adaptation. In some areas sea level rise may completely inundate now inhabited areas (e.g., river deltas, Pacific Islands).

c. California GHG Emissions and Climate Change

In California, the main sources of GHG emissions are from the transportation and energy sectors. According to the California Air Resources Board (ARB) draft GHG emission inventory for the year 2004, 41 percent of GHG emissions result from transportation and 25 percent of GHG emissions result from electricity generation. California produced 497 million metric tons of CO_2 equivalents ($MMtCO_2e$) in 2004. California produces about two percent of the world's GHG emissions, with about 0.55 percent of the population.

The potential effects of future climate change on California resources include (California Climate Change Portal, 2007):

- Air temperature: increases of 3 to 10.4 degrees Fahrenheit by the end of the century, depending on the aggressiveness of GHG emissions mitigation.
- Sea level rise: 6 to 30 inches by the end of the century, depending on the aggressiveness of GHG emissions mitigation.

- Water resources: reduced Sierra snow pack with earlier melting, reduced water supplies, increased water demands, changed flood hydrology.
- Forests: changed forest composition, geographic range, and forest health and productivity, increased wild fire intensity, wider areas potentially subject to wild fires.
- Ecosystems: changed habitats, increased threats to certain endangered species.
- Agriculture: changed crop yields, increased irrigation demands, increased impacts from tropospheric ozone.
- Public health: increased ozone smog with longer smog seasons and higher peaks; commensurate respiratory illness and weather-related mortality.
- Industry: Increased cost for reductions of smog-forming emissions due to public health concerns.

2. Regulatory Setting

a. California Climate Change Legislation and Programs

AB 1493 requires the state to develop and adopt regulations that achieve the maximum feasible and cost-effective reduction of climate change emissions emitted by passenger vehicles and light-duty trucks. Regulations were adopted by the ARB in September 2004. For these standards to go into effect, the federal EPA must approve a waiver of Clean Air Act requirements to allow California (and other states) motor vehicle standards to exceed federal standards.

The California Global Warming Solutions Act of 2006 (AB 32) requires ARB to design and implement emission limits, regulations, and other measures. These will reduce, by 2020, statewide GHG emissions to 1990 levels (representing a 28 percent reduction).

SB 1368 is an AB 32 companion bill that was signed into law in 2006. It requires the California Public Utilities Commission (CPUC) to establish a GHG performance standard for base load generation from investor-owned utilities, and the California Energy Commission (CEC) to establish a similar standard for publicly-owned utilities. State agencies coordinate the Renewable Portfolio Standard which calls for more energy to come from clean, renewable, sources such as wind and sun.

The Office of Planning and Research (OPR) is currently developing guidelines for implementation of climate change analysis in CEQA documents. SB 97 requires OPR to develop guidelines for the feasible mitigation of greenhouse gas emissions or the effects of greenhouse gas emissions by July 1, 2009. The Resource Agency must certify and adopt those guidelines by January 10, 2010. Until these guidelines are adopted, there is no formal guidance on how to conduct climate change analyses in CEQA documents.

Executive Order S-3-05 calls for a reduction of GHG emissions to 2000 levels by 2010, a reduction of GHG emissions to 1990 levels by 2020, and a reduction of GHG emissions to 80 percent below 1990 levels by 2050. The order directs the CalEPA secretary to coordinate development and implementation of strategies with other specified state agencies.

Executive Order S-1-07, the Low Carbon Fuel Standard, calls for a reduction of at least 10 percent in the carbon intensity of California's transportation fuels by 2020. The California Climate Action Team (CAT) has documented that the following actions will help achieve the 40 percent GHG reduction (about 175 $MMTCO_2e$ annually) required by 2020. Legislation or agency regulations will require actions expected to achieve the following:

- Energy Efficient Buildings – reduces 3 $MMTCO_2e$
- Energy Efficient Appliance Standard – 7 $MMTCO_2e$
- Water Use Efficiency – 1 $MMTCO_2e$
- Smart Land Use Planning and Transportation Efficiency – 19 $MMTCO_2e$

On state buildings and lands, California is currently pursuing solar energy generation, retrofitting state buildings for energy efficiency, and urban forestry programs. The forestry programs alone are projected to achieve one $MMTCO_2e$ reductions. Also, new state buildings will be built to LEED (Leadership in Energy and Environmental Design) standards. In the mitigation section of this report, the EIR defines Coalinga's General Plan actions that support and help implement programs recommended by the CAT (above). Coalinga's actions will primarily be in the areas of energy efficient buildings and smart land use and transportation.

SB 375 requires Regional Transportation Plans (prepared by COGs and MPOs) to include sustainable community strategies that offer incentives to reduce GHG emissions and air pollution. The mechanisms are through promoting a greater housing choice and shorter commutes, reducing fossil fuel consumption and preserving more farmlands and habitat. It also includes a provision to update the California Environmental Quality Act to incorporate these sustainable community strategies into land use review.

b. Fresno County GHG Emission Reduction Program

Local efforts to quantify and reduce GHG emissions have primarily been undertaken by the San Joaquin Valley Air Pollution Control District, which has jurisdiction in Coalinga. Many of the programs implemented by the District to reduce emissions of criteria air pollutants, such as ROG, NOx, and PM, also reduce greenhouse gas emissions.

Numerous rules adopted by the district to address criteria pollutant emissions also have the side benefit of reducing greenhouse gases. For instance, several district rules address conventional emissions from combustion sources such as boilers, heaters, and engines. These rules often result in equipment modifications or replacement that improves the energy efficiency and reduces fossil fuel use.

Through the CEQA review process, the district evaluates impacts from land use development projects, and recommends measures to reduce emissions. Mitigation measures focus on reducing emissions from motor vehicles and improving energy efficiency, both of which directly reduce criteria pollutants and GHGs. Such strategies include incorporation of energy efficiency measures (increased insulation, high efficiency appliances and lighting, passive and active solar systems, etc.) that go beyond current building standards. The District also promotes smart growth principles to reduce vehicle trips and increase the viability of alternative transportation.

The District directly funds emission reduction projects to replace or retrofit older, high emission engines with cleaner and more efficient engines. This usually simultaneously reduces fuel use and reduces CO_2 emissions. Conversion of stationary and mobile diesel engines to natural gas or electric motors also usually reduces CO_2 emissions. The district implements outreach campaigns to promote a variety of clean air programs, including clean car awareness, pollution prevention, energy efficiency and transportation alternatives. All of these promote community consciousness and lifestyle choices that help reduce GHG emissions and thus climate change.

3. Thresholds of Significance

No formal local or statewide guidance currently exists for determining climate change significance thresholds. OPR has prepared a technical advisory on CEQA and Climate Change (June 2008). For purposes of this EIR no quantitative significant threshold is used. Emissions estimates are quantified, but the significance threshold is qualitative and based on whether or not the potential increases are substantial when compared to the baseline conditions.

4. Impact Assessment and Methodology

The emissions from the proposed General Plan principally come from burning fossil fuels; hence they are almost all CO_2, with a very small component of methane or other GHG. Subsequent discussion focuses on how much CO_2 would be created via construction and operation emissions, and therefore, CO_2 is the focus for mitigation. The URBEMIS air quality modeling program was used to estimate potential future annual CO_2 emissions resulting from construction and "operation" of a city of approximately 56,373 residents in 2025. The modeling provides a reasonable worst case scenario; however, there are some uncertainties in the modeling used for this EIR. These uncertainties are described below.

a. Transportation Emission Factors

The analysis assumes today's transportation CO_2 emission factors would apply in future years. The extent to which motor vehicle fuel formulations would change in the future is unknown. The ARB is currently working on rules to reduce vehicle fuel carbon content by 10 percent. It is likely that AB 32 and other GHG regulatory programs would reduce at least some of the vehicle CO_2 emissions projected for future years.

b. Electricity Generation Mix

According to the California Energy Commission, biomass and waste, geothermal, solar, small-hydroelectric and wind energy resources are all renewable resources. Renewables currently make up about 11 percent of the states electricity generation. The remaining energy sources: coal (16 percent), large hydroelectric (19 percent), natural gas (41 percent), and nuclear (13 percent) are not considered renewable energy sources. It is unclear what the future electric generation mix may be.

c. Pumping Water

Pumping water to supply the growth associated with the proposed project will produce more CO_2. Not enough data is available for an accurate estimate of increased GHG from this source.

d. New Versus Redistributed Emissions

Not all of the emissions calculated below are necessarily new emissions. It is likely that a portion of the emissions are actually redistributed – not new – because it is likely that people and the cars would have gone somewhere else in California. If that is the case, the emissions calculated in this EIR overestimate the cumulative GHG emissions resulting from implementation of the General Plan. However it is unknown what percentage would be no versus those that are redistributed from another jurisdiction. Therefore this EIR takes a conservative approach and assumes that all emissions are new.

5. Impact Discussion and Proposed Mitigation Measures

Potential GHG emissions would result from two sources, 1) construction activities, and 2) operational sources such as vehicle emissions and the indirect emissions resulting from electricity consumption. These emissions are quantified below. The proposed General Plan Land Use, Circulation and Air Quality Elements each contain measures that would reduce potential GHG emissions. It should be noted that it is generally agreed that no single project, including implementation of a general plan could impact climate change individually. Therefore all impacts identified below should be considered cumulative impacts.

a. Construction Emissions

The combustion of diesel fuel in the heavy equipment used for construction activities would result in emissions of CO_2. The URBEMIS modeling program was used to calculate the potential CO_2 emissions associated with the construction activities necessary to reach buildout of the General Plan. The modeling indicates that construction activities may result in the production of approximately 50,000 tons of CO_2 annually between the years 2011 and 2024. Because it is substantial, this increase contributes to a significant cumulative impact on greenhouse gas emissions and global climate change. Data sheets for these calculations are included in Appendix E.

CC Impact 1 Construction equipment would emit approximately 50,000 tons of CO_2 annually during buildout of the General Plan between the years 2011 and 2024

Mitigation Measures in the proposed General Plan

The most feasible and cost-effective mitigation for reducing construction related GHGs in the near term is to use a cleaner fuel, such as a biodiesel/fossil diesel blend. Use of biodiesel avoids about 70 percent of the GHG emissions produced by using traditional diesel. Two Implementation Measures in Policy AQ5-1 require the use of biodiesel or similar fuels for construction projects.

> AQ 5-1.4 All City-funded projects that involve the disturbance of more than one acre shall use construction equipment that utilizes fuels, such as biodiesel, which reduce GHG emissions by 10 percent compared to typical fuels.

AQ 5-1.5 The City shall require all projects that involve the disturbance of more than 5 acres to use construction equipment that utilize fuels, such as biodiesel, which reduce GHG emissions by 10 percent compared to typical fuels.

In addition Implementation Measure AQ4-1.1 includes a reference to Table 5-8 in the Air Quality Element. This table includes construction mitigations for short-term construction related air quality impacts.

AQ4-1.1 Require new development to reduce short-term emissions during construction by implementing conditions on major new development projects in accordance with Table 5-8 presented below.

Two of the measures included in Table 5-8 address $C0_2$ emissions during construction:

b. Minimize idling time (e. g., ten minute maximum)
d. Replace fossil-fueled equipment with electrically driven equivalents

Residual Impacts
Implementation of these measures would reduce GHG emissions associated with construction by at least 10 percent. However, based on the scope of the proposed General Plan and the construction level anticipated, impacts would still be *significant and unavoidable*.

b. Operational Emissions

Operational GHG emissions would result from the vehicle traffic and energy use required by structures in the city. Vehicle use results in emissions because CO_2 is byproduct of the combustion of gasoline. Electricity necessary to light, heat, and cool structures is derived from the combustion of fossil fuels as well, and therefore produces CO_2 emissions. Based on the proposed General Plan the population of Coalinga would increase from approximately 12,000 in 2008 to approximately 56,373 in 2025. This increased population would in turn increase the number of vehicle miles travelled in the city and the amount of electricity consumed. The URBEMIS program was used to estimate the potential increase in GHG (CO_2) emissions. *(Note: The URBEMIS data sheets in Appendix E are based on preliminary population estimates of 61,000 people. The CO_2 emitted per capita was used to determine the CO_2 values in table V.M.-1).* Because it is substantial, this increase contributes to a significant cumulative impact on greenhouse gas emissions and global climate change. A summary is presented in Table V.M.-1. URBEMIS data sheets are included in Appendix E.

Table V.M.-1
General Plan Operational CO_2 Emissions

	Year 2008	Year 2025
Population	12,000	81,000
No. Homes	3,600	27,000
No. Vehicles[1]	6,000	40,600
Total CO_2	83,000 tons[2]	558,900 tons/yr[3]
Percent increase	Baseline	Over 673% more CO_2

[1]Based on state-wide vehicle ownership average of 1.5 per household.
[2]Scaled emissions from URBEMIS 9.2.4 of 6.9 tons/year/person
[3]Emissions calculated with URBEMIS 9.2.4

CC Impact 2 Implementation of the General Plan would increase operational emissions of GHGs by more than 673 percent, to 558,900 tons annually by the year 2025

Mitigation Measures in the Proposed General Plan
There are a number of Policies and associated Implementation Measures that would address operational GHG emissions. These policies encourage alternative transportation and energy efficient building design - both of which would reduce energy consumption and related GHG emissions. The policies include:

LU1-5 Encourage consistent and comprehensive planning for the city.

LU1-6 The City shall encourage proposals that help to create a more sustainable community.

LU1-7 The City shall provide leadership for sustainability within the community by encouraging green practices for municipal buildings and landscapes.

LU5-2 The City shall enhance the city's historic Downtown Core by creating an efficient, attractive, and pedestrian-oriented area that reflects the city's historic character while providing a diverse mix of uses.

C1-4 Maintain and improve existing circulation and transportation facilities

C1-6 Shall encourage the use of transportation alternatives that reduce the use of personal vehicles.

C2-1 Promote non-motorized bike and pedestrian circulation facilities to serve all areas of the city and link regional systems, with priority coordination with school, park, transit, and major facilities.

AQ2-1 Encourage and support development projects that propose alternatives to standard vehicle trips.

AQ5-1 Actively seek to reduce greenhouse gas (GHG) emissions within the Planning Area.

AQ5-2 Identify opportunities for creating energy conservation and efficiency programs for application in all city facilities, schools, and local businesses.

AQ5-3 The City shall encourage sustainable employee commuting and municipal transportation practices.

Many of these measures are general in nature and encourage neighborhood design and agency coordination that would reduce GHG emissions only if they are strictly implemented during subsequent development. There are however also specific measures in the General Plan that quantitatively address GHG emissions. These measures should be considered a starting point for the City as they develop the Community Greenhouse Gas Reduction Plan, as required by Implementation Measure AQ5-1.10. The following Implementation Measures included in the proposed General Plan reflect those standards developed by the California Air Pollution Officers Association (CAPCOA) in recent years to specifically address GHG emissions:

AQ5-1.6 The City shall locate neighborhood commercial uses within ½ mile of residential areas so that they can be more easily reached by bicycle or on foot.

AQ5-1.7 The City shall coordinate with regional transit providers to locate transit stops within ½ mile of new residential and commercial areas.

AQ5-1.8 Commercial developments expected to have over 100 employees and not located within 1/4 mile of existing retail services shall set aside portions of the site for retail services that can serve employees and surrounding businesses.

AQ5-1.9 To reduce heating and cooling requirements of new structures, the City shall require new development to include measures such as parking lots and streets with 50 percent tree cover within ten years of construction, paving materials that have as light a color as is feasible, roofing materials that reduce transmission of heat to the building below, separation between the ventilation and thermal conditioning systems.

AQ5-2.3 The City shall evaluate the feasibility of constructing new city structures to LEED standards, and will give preference in approval, water and sewer service, to housing developments that meet the LEED neighborhood design standards.

AQ5-2.4 The City shall give preference in approval and water and sewer service, to housing developments that incorporate photovoltaic and/or solar water heating systems. Solar water heating and/or photovoltaic systems shall be required for

all new single family residences with more than 2 baths, multi-family residential developments larger than 4 units, and commercial buildings larger than 20,000 square feet.

C1-4.6 The City shall require new development proposals, including Public Works projects, to include an evaluation of whether or not roundabouts could be used as an alternative to stop sign or traffic signal controlled intersections.

Residual Impacts

Strict implementation of the measures listed above would reduce GHG operational emissions when compared to more typical development styles. However, it is unclear the extent to which reductions would be achieved without knowing specific development proposals. When a suite of standard URBEMIS mitigation measures, some of which are similar to those Implementation Measures above, were incorporated into the modeling, GHG emissions were reduced by as much as 12 percent (refer to Appendix E). However, those mitigations include specific design guidelines that are not necessarily consistent with the land use scenarios proposed by the City. For example, a mitigation measure that can significantly reduce GHG emissions includes developing city blocks that are no more than 900 feet long, with six intersections for every mile of street. This would potentially reduce the number of automobile trips because residences may be more connected to commercial or other services, making it more likely that residents would use a bicycle or walk to their destination. This type of mitigation may be possible to implement during subsequent development, however it will be difficult to achieve consistently considering much of the proposed residential development would be relatively low density residential, and in some cases located a considerable distance from services.

Future GHG reductions may also come from a wholesale change to renewable fuels that may be mandated by government action or the marketplace. For example, motor vehicle fuel could transition from gasoline to ethanol made from switch grass, biodiesel from non-food plants could replace fossil diesel, and methane made from crop residue and green waste could substitute for natural gas. However, even with the changes discussed in this paragraph, the proposed General Plan would result in *significant and unavoidable* impacts, because their effectiveness is uncertain at this time.

6. Cumulative Impacts

Global climate change is inherently a cumulative impact because only very large projects, e.g., national vehicle emissions standards, could significantly impact climate on their own. Therefore all Climate Change/Greenhouse Gas Emissions impacts identified above are considered cumulative impacts and are considered significant and unavoidable given uncertainty in effectiveness of mitigation measures.

VI. ALTERNATIVES ANALYSIS

A. INTRODUCTION

CEQA *Guidelines* §15126.6 provides direction for the discussion of alternatives to the proposed project. This section requires the Alternatives analysis to include:

- A range of reasonable alternatives to the project, or to the location of a project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives.
- A setting forth of alternatives that "...shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project." [15126.6(f)]
- A discussion of the "No Project" alternative, and if the environmentally superior alternative is the "No Project" alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives. [15126.6(e)(2)]
- A discussion and analysis of alternative locations that would substantially lessen any of the significant effects of the project need to be considered for inclusion in the EIR. [15126.6(f)(2)(A)]

Given the CEQA mandates listed above, this section (1) describes the range of reasonable alternatives to the proposed General Plan, including alternative sphere of influence boundaries, alternative city limits boundaries, alternative densities and locations of types of land uses; (2) examines and evaluates resource issue areas where significant adverse environmental effects have been identified, and compares the impacts of the alternatives, and (3) identifies the environmentally superior project.

B. SUMMARY OF ALTERNATIVES CONSIDERED

1. Rationale for Selection

In defining feasibility of alternatives, the CEQA *Guidelines* state: "Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site" [§15126.6(f)(1)]. Through the scoping process, if an alternative was found to be infeasible, as defined above, then it was dropped from further consideration. In addition, CEQA states that alternatives should "…attain most of the basic objectives of the project..." [§15126.6(a)]. If an alternative was found to not attain the basic objectives (refer to EIR Chapter III), then it was also eliminated.

Based on the above CEQA requirements, several alternatives were chosen from the alternatives screening to be carried forward for further review. They are the required No Project Alternative, the Reduced Buildout Alternative, and the Reduced Acreage/Increased Density Alternative.

2. Alternative 1 – No Project Alternative/General Plan 1994

The No Project Alternative assumes that the proposed General Plan is not adopted by the City of Coalinga and that new development would be guided by the existing General Plan, adopted in 1994. This alternative would allow growth under the existing General Plan Policies. Buildout under this General Plan would result in an ultimate population of approximately 16,300 by 2015, and assumes infrastructure improvements and increased services necessary to accommodate that growth would occur. The maximum residential buildout population, based on land use designations outlined in the 1994 General Plan, would be approximately 31,400 within the current city limits. Maximum residential buildout population of the 1994 SOI area would add an additional 12,800 persons, for a total buildout population of 44,200 under the No Project Alternative.

TABLE VI-1
Maximum Residential Buildout under 1994 General Plan

Land Use	DU/Acre	City Limits			SOI			TOTAL		
		Acres	DUs	Pop.	Acres	DUs	Pop.	Acres	DUs	Pop.
ER	2	29	58	174	179	358	1,074	208	416	1,248
RSF	6	779	4,674	14,022	637	3,822	11,466	1,416	8,496	25,488
RML	15	130	1,950	5,850				130	1,950	5,850
RMM	25	117	2,925	8,775				117	2,925	8,775
MX	15	55	825	2,475				55	825	2,475
AG*	0.1	355	36	107	920	92	276	1,275	128	383
Totals	n/a	1,465	10,468	31,403	1,736	4,272	12,816	3,201	14,740	44,219

Source: based on PMC existing land use acreage in Draft 2025 General Plan Update, Table 2-2

3. Alternative 2 – Reduced Buildout Alternative

The Alternative 2 - Reduced Buildout Alternative - shows the results of adopting a new General Plan, but one with a less intensive land use concept. The organization of land uses is the same as in the proposed General Plan, although the acreage devoted to Residential Ranchette and the Manufacturing/Business land use categories is reduced (refer to Table VI-2 Figure VI-1). The SOI area would include 3,180 acres rather than the approximately 7,892 included in the proposed General Plan. *This alternative would result in an overall residential density in the proposed SOI area of approximately five dwelling units per acre.* This alternative would incorporate all of the proposed Policies and Implementation Measures contained within the proposed General Plan. This alternative would result in a smaller buildout population than the proposed General Plan, and would place fewer burdens on the existing infrastructure system.

TABLE VI-2
Acreage by Land Use Category and Maximum Residential Buildout,
Alternative 2 – Reduced Buildout Alternative

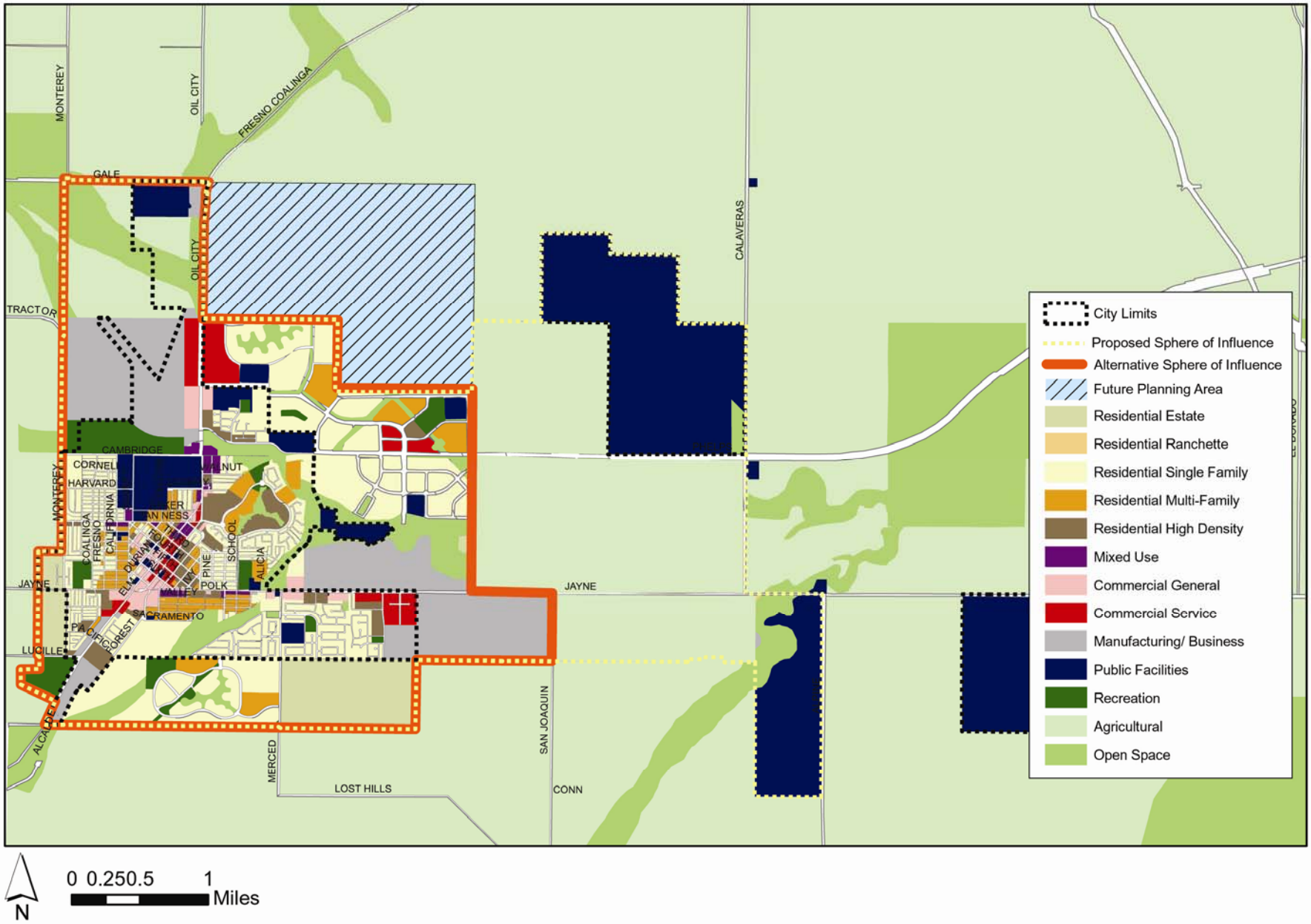
Land Use	DU/Acre	City Limits			SOI			Total		
		Acres	DUs	Pop.	Acres	DUs	Pop.	Acres	DUs	Pop.
Agriculture		95			238			333		
Commercial General		96			8			104		
Commercial Service		100			85			185		
Manufacturing/Business		274			832			1,106		
Open Space		286			475			761		
Public Facilities		1,921			48			1,969		
Recreation		144			131			275		
Residential Estate	2	29	58	174	390	780	2,340	419	838	2,514
Residential High Density	25	168	4,200	12,600	9	225	675	177	4,425	13,275
Residential Medium Density	15	171	2,565	7,695	131	1,965	5,895	302	4,530	13,590
Residential Ranchette	0	0	0	0	0	0	0	0	0	0
Residential Single-Family	5	679	3,395	10,185	833	4,165	12,495	1,512	7,560	22,680
Mixed Use	15	41	615	1,845	0	0	0	41	615	1,845
Totals		4,004	10,833	32,499	3,180	7,135	21,405	7,184	17,968	53,904
*Based on maximum buildout of 81,240 shown in Table 2-9 of the General Plan										

4. Alternative 3 – Reduced Acreage/Increased Density

Alternative 3 utilizes the same SOI boundary as Alternative 2, but increases the residential densities to allow the city's population to grow at the same level expected under the proposed General Plan (refer to Table VI-3 and Figure VI-2). The proposed SOI area would be approximately 3,180 acres as with Alternative 2. The acreage devoted to the Manufacturing/Business land use and the Residential Ranchette land use would be reduced. Acreage devoted to the Residential Estate land use would be reduced, while that designated for Residential Single Family, Medium Density and High Density would be increased to allow for greater population growth in a smaller area. Figure VI-2 has been created to show conceptually how these modifications would affect the land use category map. These are not necessarily recommended locations for the land use categories. *This alternative would result in an overall residential density in the proposed SOI area of approximately seven dwelling units per acre.* This alternative would implement the Policies and Implementation Measures in the proposed General Plan.

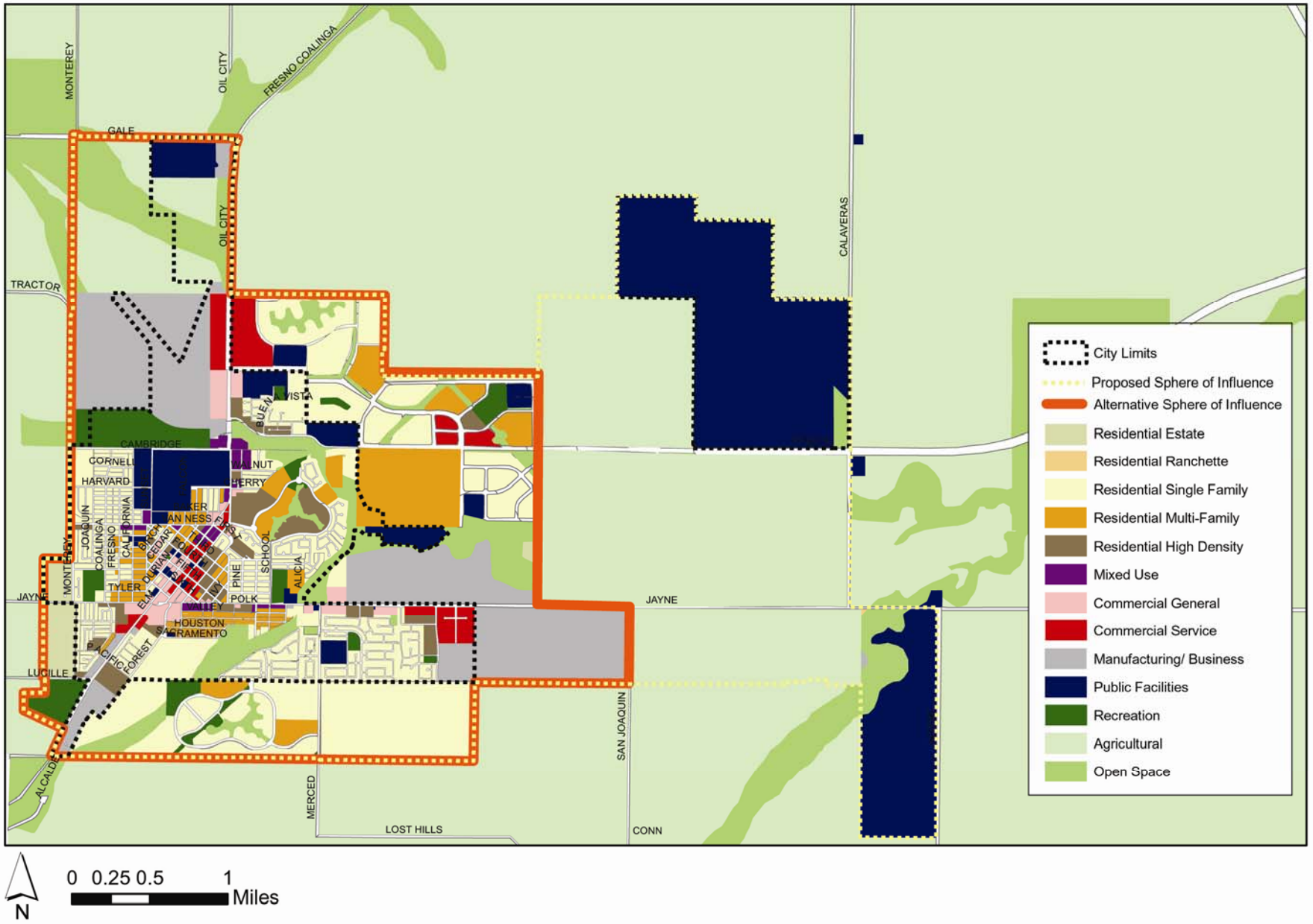
TABLE VI-3
Maximum Residential Buildout
Alternative 3 – Reduced Acreage/Increased Density

Land Use	DU/Acre	City Limits			SOI			Total		
		Acres	DUs	Pop.	Acres	DUs	Pop.	Acres	DUs	Pop.
Agriculture		95			238			333		
Commercial General		96			8			104		
Commercial Service		100			85			185		
Manufacturing/Business		274			832			1,106		
Open Space		286			475			761		
Public Facilities		1,921			48			1,969		
Recreation		144			131			275		
Residential Estate	2	29	58	174	16	32	96	45	90	270
Residential High Density	25	168	4,200	12,600	33	825	2,475	201	5,025	15,075
Residential Medium Density	15	171	2,565	7,695	235	3,525	10,575	406	6,090	18,270
Residential Ranchette	0	0	0	0	0	0	0	0	0	0
Residential Single-Family	5	679	3,395	10,185	1,079	5,395	16,185	1,758	8,790	26,370
Mixed Use	15	41	615	1,845	0	0	0	41	615	1,845
Totals		4,004	10,833	32,499	3,180	9,777	29,331	7,184	20,610	61,830



Alternative 2 – Conceptual Land Use Diagram
FIGURE VI-1

Back of Figure VI-1



Alternative 3 – Conceptual Land Use Diagram
FIGURE VI-2

Back of Figure VI-2

5. Alternatives Considered but Not Included

In theory there are an infinite number of development scenario alternatives that could be evaluated in an EIR. CEQA requires that an EIR evaluate a "reasonable range" of alternatives to the proposed project (in this case the proposed project is buildout under the proposed General Plan). For the analysis to be meaningful, the alternatives must be distinctly different from each other and meet the project objectives.

The alternatives described above were chosen to provide a representative range of land use concepts that could be evaluated in this analysis. The reason for choosing these alternatives was to ensure that a range of alternatives could be evaluated, so that the public and other decision makers would be able to make informed decisions regarding the appropriate future development scenarios for the city of Coalinga.

In many EIRs, the "Alternative Location" is evaluated in the alternatives section. An offsite location is not considered feasible when considering future growth of an urban area. Therefore this alternative was not considered in this analysis.

Alternatives recommended by interested parties include annexation of lands beyond that recommended in the proposed General Plan. These were considered and rejected because they did not significantly reduce the environmental effects of the proposed general plan, and would increase the demand for infrastructure and services beyond that which could feasibly be attained within the timeframe of the proposed General Plan.

Another alternative not considered involved maintaining the same land use scenario as is found in the existing 1994 General Plan, but adopting the policies and implementation measures in the new general plan. This alternative would most likely result in reduced impacts when compared to the proposed General Plan. However, it would not meet the objectives of the City, which include growing in a way that would meet regional housing demand and allow for adequate economic development in the coming years.

C. ENVIRONMENTAL EFFECTS OF CHOSEN ALTERNATIVES

This section describes the impacts associated with each alternative and whether or not it avoids or reduces the significant impacts expected to result from implementation of the proposed General Plan.

1. Geology

a. No Project/1994 General Plan Alternative

The EIR for prepared for the 1994 General Plan concluded that implementation of that plan would result in less than significant impacts to Geology and Seismicity after mitigation.

b. Reduced Buildout Alternative

The Reduce Buildout Alternative would result in a smaller population and fewer structures than the proposed General Plan. As a result, fewer structures and people would be subject to seismic

impacts, fewer structures would be located on expansive soils, and fewer unmapped, abandoned oil wells would be encountered. Impacts are expected to be mitigated to insignificance.

c. Reduced Acreage/Increased Density Alternative

This alternative would result in fewer structures than the proposed General Plan; however the overall buildout population would be similar. Impacts are expected to be less than the proposed General Plan, and similar to those discussed above.

2. Drainage, Erosion, and Sedimentation

a. No Project/1994 General Plan Alternative

The EIR for prepared for the 1994 General Plan concluded that implementation of that plan would result in less than significant soil erosion, drainage and flooding impacts after mitigation

b. Reduced Buildout Alternative

The Reduced Buildout Alternative would result in fewer structures being located in the FEMA floodzone, reducing the number of people and structures to flooding. Because this alternative would result in a smaller area of disturbance required for buildout, cumulative erosion and sedimentation impacts may result. In addition, because the amount of impervious surface would be reduced, more stormwater could infiltrate the ground surface, potentially resulting in fewer impacts to stormwater drainage systems. Impacts are expected to be mitigated to insignificance.

c. Reduced Acreage/Increased Density Alternative

This alternative would also reduce the amount of area that would be disturbed or converted into impervious surface, potentially resulting in reduced drainage impacts. However, because development under this alternative would include a more densely developed downtown, the area available for localized detention basins consistent with the Stormwater Management Plan, may be reduced. However, no new significant impacts would be anticipated with this alternative.

3. Cultural Resources

a. No Project/1994 General Plan Alternative

The EIR for prepared for the 1994 General Plan concluded that implementation of that plan would result in less than significant impacts to Cultural Resources after mitigation.

b. Reduced Buildout Alternative

This alternative would reduce the area that would be disturbed as a result of implementation of the General Plan, but would not significantly affect the level of impact expected.

c. Reduced Acreage/Increased Density Alternative

This alternative has the potential to locate larger buildings in proximity to historic structures, potentially affecting the context of those structures, resulting in potentially greater impacts to cultural resources. However, no new significant impacts would be anticipated.

4. Biological Resources

a. No Project/1994 General Plan Alternative

The EIR for prepared for the 1994 General Plan concluded that implementation of that plan would result in less than significant impacts to Biological Resources after mitigation.

b. Reduced Buildout Alternative

Implementation of the reduced buildout alternative has the potential to impact sensitive species and sensitive habitats through new development in undeveloped areas, although to a lesser degree than the proposed General Plan. This alternative does reduce impacts to the Los Gatos Creek Corridor, and would allow the City to increase the size of the habitat preserve currently located adjacent to the airport. This alternative would reduce significant impacts to listed species and sensitive habitats, by minimizing intrusion on Los Gatos Creek and allowing for expansion of the city's mitigation banking system, although they would most likely still be considered significant and unavoidable, especially when considered cumulatively with other projects in the San Joaquin Valley.

c. Reduced Acreage/Increased Density Alternative

See discussion for Reduced Buildout Alternative above.

5. Agricultural Resources

a. No Project/1994 General Plan Alternative

Based on the EIR prepared for the 1994 General Plan, future buildout would result in unavoidable significant impacts to agricultural resources through the conversion of Prime agricultural lands.

b. Reduced Buildout Alternative

Reducing the area required for buildout of the city of Coalinga would in turn reduce the acreage of farmland that would be converted to urban use, reducing the physical and economic Agricultural impacts expected to occur with implementation of the proposed General Plan. The impacts would be reduced, but still significant and unavoidable, especially when considered cumulatively with other conversions expected to occur within the San Joaquin Valley. Impacts would be slightly higher than with Alternative 1 based on acreage within the respective SOIs.

c. Reduced Acreage/Increased Density Alternative

See discussion for Reduced Buildout Alternative above.

6. Land Use, Population and Housing

a. No Project/1994 General Plan Alternative

The EIR for prepared for the 1994 General Plan concluded that implementation of that plan would result in less than significant Land Use, Population and Housing impacts after mitigation.

b. Reduced Buildout Alternative

This alternative would reduce the total acreage allotted for all land use categories included in the proposed General Plan. The percentage of acreage in the proposed SOI devoted to housing versus that devoted to commercial or manufacturing/business is similar to the proposed General Plan. Impacts resulting from this alternative are expected to be similar, and insignificant as well.

c. Reduced Acreage/Increased Density Alternative

This alternative increases residential densities when compared to the proposed General Plan and the other alternatives. This alternative increases the likelihood that incompatible land uses could occur, because increased housing densities places more residents in proximity to potentially incompatible uses such as commercial or manufacturing centers. These potential impacts would most likely result in impacts less than significant with mitigation.

7. Public Services

a. No Project/1994 General Plan Alternative

The EIR for prepared for the 1994 General Plan concluded that implementation of that plan would result in less than significant impacts to Police and Fire services after mitigation, and significant and unavoidable impacts to Schools.

b. Reduced Buildout Alternative

This alternative would reduce the level of public services required to accommodate the level of growth anticipated in the proposed General Plan. Many of the public service impacts evaluated in the EIR would be offset by the establishment of appropriate development impact fees, as proposed in the General Plan.

The amount of water necessary to accommodate the anticipated growth under this alternative is less than that required with the proposed General Plan. However, given the lack of identified potential new water sources, and the relatively little water remaining in the city's existing allocation, the reduced buildout alternative would also result significant and unavoidable impacts.

c. Reduced Acreage/Increased Density Alternative

This alternative would also require the establishment of development impact fees to offset the anticipated increased need for public services. The infrastructure needs would be reduced with this alternative, because the anticipated buildout population would be located within a smaller service area, resulting in shorter roads, and less intensive sewer and water line networks. Most of the impacts would be considered mitigable, except water, which would remain significant and unavoidable, for reasons similar to those discussed above.

8. Public Services

a. No Project/1994 General Plan Alternative

The amount of water necessary to accommodate the anticipated growth under this alternative is less than that required with the proposed General Plan. However, given the lack of identified potential new water sources, and the relatively little water remaining in the city's existing allocation, the reduced buildout alternative would also result in significant and unavoidable impacts.

b. Reduced Buildout Alternative

See discussion for No Project/1994 General Plan Alternative above.

c. Reduced Acreage/Increased Density Alternative

This alternative may result in the least amount of water use when compared to the other alternatives and the proposed General Plan. Generally multi-family housing requires less water and generates less wastewater than single family residences. However, water demand would still exceed the city's allocation significantly, and this alternative would result in significant and unavoidable impacts.

9. Transportation and Circulation

a. No Project/1994 General Plan Alternative

The EIR for prepared for the 1994 General Plan concluded that implementation of that plan would result in less than significant Transportation/Circulation impacts after mitigation.

b. Reduced Buildout Alternative

This alternative would result in fewer trips at buildout than the proposed General Plan. As a result, the cumulative transportation and circulation impacts would be reduced. The most significant benefit would be to those intersections and street segments located in the rural areas, that are expected to operate at LOS D, E, or F by the year 2025, as a result, at least partially, of the proposed General Plan. Significant impacts to local roads, particularly to the State Highways within the city limits are expected to remain significant due to the constraints described in the Transportation and Circulation section, however, the average daily traffic is expected to be reduced given the smaller population expected at buildout.

c. Reduced Acreage/Increased Density Alternative

The increased density alternative is expected to result in more residents being located near commercial and employment centers, increasing the likelihood that they could utilize alternative transportation (i.e. walking, bicycling, transit, etc.). However, even if use of alternative transportation increased, this alternative would significantly increase the number of residents utilizing local roads in the downtown area. Given constraints such as limited right-of-way, the necessity of coordinating with local and state agencies, and the potential lack of funding sources, LOS on roads within the city limits may still be reduced, resulting in significant impacts.

10. Noise

a. No Project/1994 General Plan Alternative

The EIR for prepared for the 1994 General Plan concluded that implementation of that plan would result in less than significant Noise impacts after mitigation.

b. Reduced Buildout Alternative

This alternative would reduce the amount of construction, and therefore construction-related noise, necessary for buildout of the city. In addition it would result in fewer cumulative automobile trips, reducing impacts associated with automobile volumes. It would also place fewer residences along the Highway 33 corridor, exposing fewer people to noise associated with automobile traffic. However, as with the proposed General Plan, all impacts would still be less than significant with mitigation.

c. Reduced Acreage/Increased Density Alternative

As with the previous alternative, this alternative would reduce the cumulative impacts associated with construction noise. It would also potentially reduce the total number of automobile trips produced by the city because residents would be located closer to city services, commercial and employment centers. However, it would place greater numbers of people in a smaller area, making it more difficult to shield them from stationary noise sources and buffer them from transportation related noises. This alternative may have more significant noise impacts than the proposed project or the previous alternatives.

11. Air Quality

a. No Project/1994 General Plan Alternative

This alternative would result in significant air quality impacts. Because the level of development would be reduced under this alternative, air quality impacts would be less than in the proposed General Plan. The prepared EIR prepared for the 1994 General plan, however, did note that air quality impacts resulting from implementation of that plan would be considered significant and unavoidable.

b. Reduced Buildout Alternative

This alternative would reduce the amount of disturbance associated with buildout of the proposed general plan, resulting in a reduction in particulate matter emissions. In addition, it would result in a smaller buildout population, and therefore fewer automobile trips, reducing mobile source emissions associated with automobile traffic. This alternative would reduce significant impacts, although they would most likely still be considered unavoidable, especially when considered cumulatively with other projects in the San Joaquin Valley.

c. Reduced Acreage/Increased Density Alternative

This alternative would also reduce the amount of disturbance associated with buildout of the general plan, resulting in a reduction in particulate matter emissions. This alternative would also result in more dense developments, increasing the likelihood that residents would be able to use

alternative methods of transportation to reach commercial centers and employment centers. As a result, the total number of automobile trips and resulting emissions could be reduced. Air Quality impacts would most likely still be considered significant and unavoidable, although this option is most likely the environmentally superior Alternative for Air Quality impacts.

12. Aesthetic Resources

a. No Project/1994 General Plan Alternative

Based on the EIR prepared for the 1994 General Plan, future buildout would not result in significant aesthetic impacts.

b. Reduced Buildout Alternative

This alternative has a greater potential to result in significant impacts compared to Alternative 1 because it would include a greater buildout area than the 1994 General Plan. However, because the proposed General Plan is not expected to result in significant impacts to aesthetic resources, this alternative would also not be expected to result in significant impacts. The region's agricultural character and vistas of rolling hills would not be impaired by the proposed development as proposed in this alternative.

c. Reduced Acreage/Increased Density Alternative

Denser communities include taller buildings, and can feel more congested, particularly to residents who are used to, and value more rural feeling communities. A more dense community would allow more of the outlying areas to remain in open space, although its taller buildings may block more views of the surrounding hillsides. As a result, this alternative may result in somewhat more significant Aesthetic impacts than the previous alternatives and the proposed General Plan.

13. Climate Change

a. No Project/1994 General Plan Alternative

When the EIR for this project was written greenhouse gas emissions were not included in the analysis. Based on the EIR prepared for the 1994 General Plan, future buildout would not result mitigations for GHG. Business as usual emissions would have GHG emissions increase from about 67,000 tons per year in 2008 to about 245,000 at buildout.

b. Reduced Buildout Alternative

This alternative would increase population about 10,000 people beyond the 1994 General Plan Alternative. However, growth would occur at a greater overall density, and increase housing, jobs, and commercial centers could be located along transit routes and bicycle/pedestrian facilities. If this was done, some permanent mitigation could be realized, and GHG emissions might be about the same as the 1994 Plan, even with increased population.

c. Reduced Acreage/Increased Density Alternative

This alternative would, if built with the same mitigations as specified in the EIR for the proposed project, be environmentally superior. It has been shown that vehicle trip making is inversely proportional to density. This alternative could, with good land use design, create very pedestrian friendly areas where substantially more trips could be accomplished by walking or cycling, thus reducing CO_2 emissions. Schools could be accessed easily by walking, community parks could provide needed ball fields, and many basic shopping needs would be close to home; thus parents could thus avoid many driving trips. Also, multi-family housing is often more energy efficient than stand-alone housing, as insulated walls are shared and centralized utilities (e.g., solar water heating) can function at high efficiencies. Per capita GHG emissions might decrease another 15 percent to 20 percent below the best case presented for the proposed project.

D ENVIRONMENTALLY SUPERIOR ALTERNATIVE

The No Project Alternative would result no additional increase in impacts to the physical environment than those that have already occurred under the existing General Plan or that have been addressed in the EIR for the existing General Plan. These impacts include those associated with growth, such as increase in loss of existing grazing land and agricultural land caused from grading activities, alteration of existing drainage patterns, use of water supply, degradation of air quality, increase in noise and changes in visual resources.

The No Project Alternative could be considered superior to the proposed General Plan because it does not increase impacts to the environment; however, this alternative may not meet the needs of facilitating growth that must be planned for by the City of Coalinga and mandated by the State of California. Nor would the no-action alternative meet the goals and objectives of the City in updating its general plan to meet the pressures of development outside its city limits.

The Reduced Buildout Alternative would reduce the intensity of many of the impacts identified in this EIR, particularly when considered cumulatively, however it would not result in fewer unavoidable impacts. Specifically, this alternative would reduce cumulative impacts to air quality, biological resources, noise, agriculture, and transportation and circulation. This alternative does appear to accommodate the population growth anticipated in the proposed General Plan and generally accommodates the growth pressures on the northwestern edge of town. Although a portion of the anticipated “Phelps” project identified in the proposed General Plan would not be included in the new SOI. In addition, buildout of the SOI would not result in connecting the existing city limits with the city’s airport, nor would it include the proposed wastewater treatment plant site, which is expected to be annexed by the City prior to construction of the plant.

The Reduced Buildout Alternative includes the “Future Planning Area” north of the city. Based on the qualitative analysis performed for this Alternatives Analysis, development of this area in the future may result in fewer impacts than development east of the city. This is because it avoids developing in the floodplain and sensitive habitats adjacent to Los Gatos Creek. In addition, the agricultural lands in the Future Planning Area are considered Prime, but those adjacent to the creek area Prime and also considered to be of “Statewide Importance”.

The Reduced Acreage/Increased Density Alternative would also reduce the intensity of the air quality, transportation, agricultural and cumulative impacts much like the Reduced Buildout Alternative would. It would accommodate the population growth predicted in the General Plan. This alternative may result in increased impacts to noise and aesthetics when compared to the proposed General Plan. It could be argued that this alternative may not meet the City's goals which include "Preservation of the city's small town character and neighborhood quality and long-term economic vitality of the community." Often more densely populated communities include taller buildings and feel more urban than rural to local residents.

The environmentally superior alternative is judged to be Alternative 2 – Reduced Buildout Alternative. It would reduce the intensity of the significant and unavoidable impacts to Air Quality, Agricultural Resources, Biological Resources, Transportation and Circulation, and Public Utilities (water) identified in the MEIR and would appear to accommodate a fairly aggressive growth rate projected by the Department of Finance and desired by the City of Coalinga.

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VII. ENVIRONMENTAL ANALYSIS

A. GROWTH-INDUCING IMPACTS

The growth-inducing impact section includes a discussion of the ways in which a project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment.

1. Existing Conditions

CEQA *Guidelines* (§15126.2 (d)) state that for the preparation of EIRs, growth-inducing effects are defined as "...ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment". The *Guidelines* expand upon this description by stating: "Included in this are projects which would remove obstacles to population growth (a major expansion of a waste water treatment plant might, for example, allow more construction in service areas)."

The current city Limits include approximately 4,541acres. The current SOI includes an additional 2,288 acres, and the Area of Interest includes 11,581 acres, for a total of 18,410 acres. The proposed General Plan would expand the SOI to 7,892 acres; 11,724 acres if the city limits are included. The proposed expansion of the AOI would include 41,146 acres beyond the proposed SOI.

The current population of Coalinga is approximately 17,801, with 11,217 in households and 5,684 persons living in group quarters. The estimated annual growth to 2025, assuming an average annual growth rate of 3.5 percent is 22,188 persons excluding group quarters (PMC; refer to Table 2-3 in the General Plan). However, the current development proposals with residential components shows a demand for housing that would serve an additional 38,670 (excluding group quarters) or a 29 percent growth in population (refer to Table 2-4, and page 2-14 in the proposed General Plan).

2. Proposed General Plan

The proposed General Plan anticipates the city's projected level of growth, while avoiding harm to the environment and improving the overall quality of life in Coalinga, through the following guiding principals:

- Confining growth to areas that create a logical extension of the city and do not result in haphazard or scattered leap-frog style development is important to encourage infill type development and to establish an effective connection between existing development;
- Planning growth around the city's established core, enabling the efficient use of existing roadway patterns, utility infrastructure, commercial areas, and recreational space; and,

Based on Government Code §65300, the update of the Coalinga General Plan is required to serve as a comprehensive, long-term plan for the physical development of the city. By definition, the proposed General Plan intends to provide for and address the future growth within the designated Sphere of Influence and to comment on and direct potential growth in the proposed Area of Interest. By its very nature, the proposed General Plan would remove an obstacle to growth by providing changes in land use designations designed to increase housing, commercial areas, industrial areas, public services and utilities to the extent that the services are made available to accommodate the growth. By designating an aggressive long-term land use plan, it is the intent of the City to guide long range development consistent with its guiding principles as stated on Page I-4 of the General Plan, principally to "maintain City control of land within, and adjacent to, the City's Sphere of Influence through long range planning efforts to expand the SOI and oppose urban scale development outside the city limits."

3. Project Impacts

The proposed General Plan is inherently "growth-inducing" because it will directly foster acceleration of the construction of residential housing, new commercial centers, public facilities, and related developments, and therefore economic growth. Growth inducement is not a significant impact unless it causes significant physical impacts or unless the growth is beyond the capacity of the community to accommodate it. "It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment (CEQA *Guidelines* §15126.2(d)." There are a number of significant physical impacts associated with the growth anticipated in the proposed General Plan. These are discussed in detail in Chapter V.

The proposed General Plan could also be considered growth inducing because it anticipates population growth that requires water resources and a circulation system beyond what the City can reasonably accommodate. These two issues are summarized below, and are also discussed in Chapter V.

a. Water Supply and Infrastructure

Coalinga obtains 10,000 acre feet of potable water through an agreement with the Bureau of Reclamation. The City uses approximately half of this allotment to meet their current potable water needs, and sells a significant amount of the remainder of the allotment to the Harris Ranch feedlot (refer to Chapter V. *Public Utilities*). Under current use patterns, 10,000 acre feet will be sufficient to meet the needs of approximately 21,250 people. This is very close to the Department of Finance population projections for the city, but less than half of the population projections in the proposed General Plan. There is currently an inadequate supply of water to meet the needs outlined in the new General Plan, and new water sources have not been identified. The City is in the process of canceling their contract with Harris Ranch, but although that will increase water supply for a short-term, it will not meet the long-range water demand,. Therefore, despite the fact that there are a number of demand reducing policies and implementation measures included in the Public Facilities and Services Element, the demand for water would exceed the City's ability to accommodate it.

b. Transportation and Circulation

Due to constraints within the city of Coalinga, including lack of road rights-of-way within the downtown area, it may be physically impossible to make the road improvements (i.e. widening) that would be necessary to accommodate the growth anticipated in the proposed General Plan. In addition, because road improvements on major streets within the city, including Elm Street and Polk Street, are also State Highways, it may be difficult to coordinate improvements when they become necessary. In other words, even in cases where a developer pays their "fair share" towards road improvements, those improvements would need to be programmed and constructed by Caltrans, which could occur at a future date, rather than when the impact demands it. As a result, the City would not be capable of guaranteeing that road widening would occur to accommodate projected growth, thus resulting in a growth inducing impact related to traffic and circulation.

B. SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

The CEQA *Guidelines* (§15126 (c)) state that for the preparation of EIRs, a discussion of any significant irreversible environmental changes which would be caused by the proposed project should it be implemented. Uses of non-renewable resources during the construction and operational phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Also, irreversible damage can result from environmental accidents associated with the project.

Since this project is the proposed General Plan, there would be commitment of resources over the long term, including the commitment of agricultural and open space land, commitment of material and natural resources for construction, commitment of energy and water resources, contribution to future cumulative air quality impacts, and overtaxing circulation systems. Commitments and irreversible environmental changes are further described in the following sections.

1. Commitment of Agricultural and Open Space Lands

The city currently is surrounded by agricultural lands under Williamson Act Contracts and open space lands that are used for animal migration, particularly along the three major creek systems. The proposed General Plan will irreversibly commit lands currently in agricultural use and open space use to development pressures. The City has taken this into consideration but there are no lands nearby that can be used for growth other than those designated for agriculture. The proposed General Plan includes measures to reduce growth inducing impacts to agriculture and open space lands, and to the extent practicable, has included measures to increase density and provide safeguards to agricultural and open space lands.

2. Commitment of Materials and Natural Resources

Future development associated with growth under the proposed General Plan will irreversibly commit natural building materials, including wood, quarried materials, synthetics, refined metal, and petroleum. The extent to which these natural resources and materials would be needed has not been quantified because there is lack of information with regard to the need for each associated materials. It is an irreversible commitment, however. Gravels and quarried materials

and unrefined petroleum products are available locally. Wood and other building materials would be brought in from other areas at the time they are needed. The proposed General Plan includes measures to stop development when resources are not available to allow the development to occur, and provides measures to reduce the consumption of natural materials to the extent practicable.

3. Commitment of Energy Resources

The Commitment of energy resources (electricity, natural gas, coal, and other resources, including corn for production of ethanol) would be increased with ultimate development of the general plan. This commitment of energy would have secondary effects by increasing the demand for fuels that cause the production of carbon dioxide that is a contributor to global warming and the climate changes currently occurring world wide. Measures have been included in the various elements of the proposed General Plan to the extent that they are available to reduce commitment of energy resources; however, these measures may not be sufficient to reduce the overall increase in demand for energy resources. It is the intent of the City of Coalinga to continue to review the general plan in the years to come for the purpose of reducing commitments of resources; however, these resources would continue to be committed over the years to meet the needs of a growing population. Note that the commitments would occur wherever growth occurs, so Coalinga is acknowledging its fair share of these commitments through the general plan and environmental review process.

4. Commitment of Water Resources

The growth associated with the proposed General Plan would accelerate water supply demand considerably and would commit a finite and non-renewable resource for a long-term. This commitment may exceed the ability of the community to provide the services; and, although the City has policies in place to discourage development from occurring beyond the ability of the community to provide water, during drought years and in light of the climate changes occurring world wide, the provision of adequate water supplies for the community may not be possible.

Indirectly, the commitment to expand the city limits and the Sphere of Influence boundary is committing the City to find other sources of water, since groundwater and water reuse strategies would not be sufficient to provide potable water to the community. The City would be required to compete with other water users for this resource, and at this time it is not possible to accurately state that water could be found for the ultimate development of the community. This is an irreversible commitment of resources that cannot be mitigated to insignificance.

5. Degradation of Ambient Air Quality

The proposed project will accelerate the increase in operational emissions, both Countywide and in the Coalinga area, and will accelerate cumulative impacts to air quality. Section V.H. Air Quality, describes mitigation measures to lessen the impact of the proposed project.

Note that degradation of ambient air quality contributes to the release of emissions into the air, of which Carbon Dioxide is considered a contributor to global warming along with the continuing trend toward global climate changes. This contribution is acknowledged to be a significant

impact, and the proposed General Plan includes measures to assist in the reduction of global warming by reducing the air quality impacts, but not to a level that is considered insignificant.

6. Exceedance of Circulation System Capacity

The cumulative development as proposed in the General Plan would accelerate the generation of additional traffic to existing infrastructure, particularly the downtown area and state highways. Currently, the City has policies to direct traffic away from the downtown area to some extent, and will provide needed commercial and public services in other areas to balance traffic on city roadways to the best practicable. However, it will irreversibly commit the community to the provision of other collectors and arterials to meet community needs at ultimate buildout.

In addition, the growth of the city would irreversibly commit California Department of Transportation to provide adequate capacity on state highways, particularly SR 198 and SR 33 that flow through the community. These highways would require expansion to meet the traffic needs. Some of the costs of the roadway improvements would have to be borne by the community since the traffic generated is local and not interstate; however, there would still be commitment of resources from the state to maintain and improve the two state highways.

7. Contribution to Climate Change

The proposed General Plan would result in significant emissions of greenhouse gases, particularly carbon dioxide (CO_2). There are numerous policies included in the General Plan that, if implemented, could help to reduce potential greenhouse gas emissions, including providing opportunities to use alternative modes of transportation and allowing for a mix of uses that encourage walking rather than driving. There are also measures that require construction equipment to utilize alternative fuels to reduce emissions. The proposed land use scenario does not necessarily lend itself to "walkability" or provide the density, in most cases, to make alternative transportation likely. Much of the residential development is on larger lots and somewhat isolated from potential job centers and commercial services. It is most likely that buildout of the General Plan, as proposed, would contribute cumulatively to climate change and make it more difficult for the State of California to meet its GHG reduction goals, unless the City emphasizes the development of walking trails, transit, and other non-vehicle modes of transportation.

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VIII. MITIGATION MONITORING AND REPORTING PLAN

A. STATUTORY REQUIREMENT

When a Lead Agency makes findings on significant environmental effects identified in an EIR, the agency must also adopt a "reporting or monitoring program for the changes to the project which it has adopted or made a condition of approval in order to mitigate or avoid significant effects on the environment" (Public Resources Code §21081.6(a) and CEQA *Guidelines* §15091(d) and §15097). The Mitigation Monitoring and Reporting Plan (MMRP) is implemented to ensure that the mitigation measures and project revisions identified in the EIR are implemented. Therefore, the MMRP must include all changes in the proposed project either adopted by the project proponent or made conditions of approval by the Lead or Responsible Agency.

B. ADMINISTRATION OF THE MMRP

The City of Coalinga is the Lead Agency responsible for the adoption of the MMRP. According to CEQA *Guidelines* §15097(a), a public agency may delegate reporting or monitoring responsibilities to another public agency or to a private entity that accepts the delegation. However, until mitigation measures have been completed, the Lead Agency remains responsible for ensuring that the implementation of the measure occurs in accordance with the program.

C. MITIGATION MEASURES

Development of the proposed General Plan and evaluation of potential impacts in the Draft MEIR were coordinated so that mitigation measures identified during the analysis could be subsequently incorporated into the proposed General Plan as new Policies and Implementation Measures. As of the time this Draft MEIR was produced, all mitigation measures previously identified in the MEIR had been incorporated into the proposed General Plan. As a result, the proposed General Plan is "self-mitigating" to the maximum extent feasible and functions as the MMRP, with the City of Coalinga acting as the responsible party.

D. REPORTING

Government Code §65400(b)(1) mandates that all cities and counties submit to their legislative bodies an annual report on the status of the general plan and progress in its implementation (the "Progress Report"). The intent of this statute is to ensure that the general plan directs all land use decisions and remains an effective guide for future development. In the City of Coalinga's proposed General Plan, Policies and Implementation Measures are the mitigation measures. Therefore, this Progress Report, which is already required by State law, will also serve as the vehicle the City uses to report on their compliance with the mitigation measures.

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B. PERSONS AND AGENCIES CONTACTED

1. General

See Appendix A, Notice of Preparation.

2. Public Services

Baker, B., Business Manager. Coalinga-Huron Unified School District. February 8, 2007. Personal Communication.

Long, B., Captain. City of Coalinga Fire Department. February 7, 2007. Personal Communication.

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Office of the Chief of Police. February 7, 2007. Personal Communication.

3. Public Utilities

Kalpakoff, Joseph. Mid Valley Disposal. May 3, 2005. Personal communication.

C. MEIR PREPARERS

This EIR has been prepared by the Morro Group, Inc., in association with the City of Coalinga. Project Director for the EIR was Mary B. Reents, President, Morro Group, Inc. The following is a list of individuals responsible for preparation of the EIR.

Responsibilities	EIR Preparer
Introduction, Summary, Environmental Analysis, Transportation and Circulation, QA/QC, Project Management	Mary Reents, Senior Consultant Morro Group, Inc.
Project Description, Geology and Soils, Drainage, Erosion and Sedimentation, Agricultural Resources, Air Quality, Aesthetic Resources, Alternatives	Keith Miller, Senior Planner Morro Group, Inc.
Biological Resources	Jon Claxton, Associate Biologist Morro Group, Inc.
Cultural Resources	Jaimie Jones, Environmental Planner Morro Group, Inc. Christina Roper, Archaeologist Sierra Valley Cultural Planning
Land Use, Population, and Housing; Public Services; Public Utilities	Stephen Umbertis, Environmental Planner Morro Group, Inc.
Noise	Karl Mikel, P.E., Noise Specialist Morro Group, Inc.
Climate Change/Greenhouse gas Emissions	Dave Morrow, Air Quality Specialist Morro Group, Inc.

X. RESPONSE TO COMMENTS

The Response to Comments section of the EIR includes comment letters for four documents, the original Draft Master EIR that was submitted to the State Clearinghouse on June 3, 2002, the Additional Information Packet that was distributed on August 31, 2007, the Draft EIR that includes a revised General Plan Land Use Element that was sent to the State Clearinghouse in November 2008, and the proposed FEIR that was distributed April 2, 2009. The responses to the latest draft of the EIR are provided first, while response to the proposed final is provided last. Many of the comment letters received on the most recent Draft EIR refer to previous comment letters. For this reason, all of the comment letters are included. Responses are given by the EIR consultant on all comment letters; however, where the letter has been superseded by a more recent letter, the reader is referred to the more recent responses. For clarification, the comment letters are organized as follows:

November 2008 Draft EIR Comment Letters	Begin on Page X-1
August 31, 2007 Draft EIR Comment Letters	Begin on Page X-52
August 30, 2007 Additional Information Packet Comment Letter	Begin on Page X-111
April 2, 2009 proposed FEIR Comment Letter	Begin on Page X-133

An errata sheet has been prepared summarizing the changes to the Draft Master EIR and has been included in the Final EIR as chapter XI. Where appropriate, the number of the errata will be mentioned in the response to comments so that the reviewers can see the actual change to the Draft EIR. Once the City has approved the General Plan Update and certified the Master EIR, the errata changes will be incorporated into the documents and the documents, as corrected will be available for review at Coalinga City Hall, 155 West Durian, Coalinga, CA 93210. The errata sheet is contained in Part 1 of this Final EIR.

A. NOVEMBER 2008 DRAFT MEIR COMMENT LETTERS AND RESPONSES

The following agencies and members of the public have prepared comments on the Revised Draft EIR:

Federal, State, and Local Agencies		Page
State of California Office of Planning and Research State Clearinghouse and Planning Unit Letter of January 2, 2009	1400 10th Street Sacramento, CA 95812 www.ceqanet.ca.gov	X-3
State of California Department of Fish and Game Central Region Letter of December 31, 2008	1234 East Shaw Avenue Fresno, CA 93710 Contact: Jeffrey R. Single	X-6
State of California Department of Transportation District 6 Letter of December 23, 2008	1352 West Olive Avenue P.O. Box 12616 Fresno, CA 93778-2616 Contact: Michael Navarro	X-12

Federal, State, and Local Agencies		Page
State of California Department of Transportation Division of Aeronautics – M.S.#40 Letter of December 26, 2008	1120 N Street P.O. Box 942873 Sacramento, CA 94273 Contact: Sandy Hesnard	X-16
State of California Native American Heritage Commission Letter of December 29, 2008	915 Capitol Mall, Room 364 Sacramento, CA 95814 Contact: Dave Singleton	X-19
County of Fresno Department of Public Works and Planning Development Services Division Letter of September January 2, 2009	2220 Tulare Street, Sixth Floor Fresno, CA 93721 Contact: Briza Sholars	X-21
County of Fresno Department of Public Health Environmental Health Division Letter of December 23, 2008	1221 Fulton Mall P.O. Box 11867 Fresno, CA 93775 Contact: Glenn Allen, R.E.H.S.	X-31
Fresno Local Agency Formation Commission Letter of December 11, 2008	2115 Kern Street, Suite 310 Fresno, CA 93721 Contact: Darryl Schmidt	X-33

General Public and Private Organizations		Page
County of Fresno Farm Bureau Letter of December 15, 2008	1274 W. Hedges Fresno, CA 93728 Contact: Ryan Jacobson	X-44
Wellington Corporation Letter of January 7, 2009	18640 Sutter Boulevard, Suite 100 Morgan Hill, CA 95037 Contact: Michael Hitchcock	X-47

The letters of comment are given in the above order with the responses following the individual letters. Letters of comment are reproduced in total, and numerical annotation has been added as appropriate to delineate and reference the responses to those comments. The pages of the letters have been re-numbered to conform to the page sequence of this section.

California Home

Monday, January 12, 2009



OPR Home > CEQAnet Home > CEQAnet Query > Search Results > Document Description

City of Coalinga 2025 General Plan Update Master EIR

SCH Number: 2002061026

Type: EIR - Draft EIR

Project Description

The City of Coalinga is in the process of updating its General Plan. To comply with CEQA provisions, an MEIR will be used to identify all potential environmental impacts associated with the update. The MEIR will be prepared in accordance with the guidelines specified in Section 21100 of the CEQA Guidelines.

Project Lead Agency

Coalinga, City of

Contact Information

Primary Contact:
Bill Skinner
City of Coalinga
(559) 935-1533
155 West Durian Avenue
Coalinga, CA 93210

Project Location

County: Fresno
City: Coalinga
Region:
Cross Streets: Entire Community
Parcel No: Various
Township: 21S
Range: 16E
Section:
Base: MDB&M
Other Location Info: City/Nearest Community: Avenal

Proximity To

Highways: 33
Airports: Coalinga Municipal
Railways: No
Waterways: Jacalitos Creek and Los Gatos Creek
Schools: West Hills Community College
Land Use: Various

Development Type

Power: Other Power Type, Transportation: Other, Waste Treatment: Hazardous, Waste Treatment: Other, Residential, Office, Commercial, Industrial, Educational, Water Facilities, Other

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Local Action

General Plan Update

Project Issues

Aesthetic/Visual, Vegetation, Water Quality, Water Supply, Agricultural Land, Air Quality, Archaeologic-Historic, Biological Resources, Cumulative Effects, Drainage/Absorption, Economics/Jobs, Flood Plain/Flooding, Forest Land/Fire Hazard, Geologic/Seismic, Growth Inducing, Landuse, Minerals, Noise, Population/Housing Balance, Public Services, Recreation/Parks, Schools/Universities, Septic System, Sewer Capacity, Soil Erosion/Compaction/Grading, Solid Waste, Toxic/Hazardous, Traffic/Circulation, Wildlife, Wetland/Riparian

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Reviewing Agencies (Agencies in **Bold Type** submitted comment letters to the State Clearinghouse)

Resources Agency; Department of Conservation; **Department of Fish and Game, Region 4**; Office of Historic Preservation; Department of Parks and Recreation; Office of Emergency Services; **Caltrans, Division of Aeronautics**; **California Highway Patrol**; Caltrans, District 6; Integrated Waste Management Board; State Water Resources Control Board, Division of Water Rights; Regional Water Quality Control Bd., Region 5 (Fresno); Department of Toxic Substances Control; Native American Heritage Commission

Date Received: 11/18/2008 **Start of Review:** 11/18/2008 **End of Review:** 1/2/2009

1.1

CEQAnet HOME | NEW SEARCH

1. State of California Governor's Office of Planning and Research, State Clearinghouse and Planning Unit

1.1 This letter acknowledges receipt of EIR. No response necessary.

01-02-09 09:26 FROM-DFG 559 2433004 T-223 P.002/006 F-770

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

December 31, 2008

William Skinner
City of Coalinga
Community Development Department
155 West Durian Avenue
Coalinga, California 93210

Mary B. Reents
Morro Group, Incorporated
1422 Monterey Street, C200
San Luis Obispo, California 93401-2944

Subject: City of Coalinga General Plan Update (2005-2025)
Master Environmental Impact Report (MEIR)
SCH No. 2002061026

Dear Mr. Skinner and Ms. Reents:

The Department of Fish and Game has reviewed the MEIR prepared for the City of Coalinga General Plan Update 2025 (General Plan) as well as the General Plan itself. The MEIR addresses potential environmental impacts associated with General Plan implementation. The proposed General Plan includes expanded Sphere of Influence (SOI) (2,288 acres to 7,892 acres) and Area of Interest (AOI) (11,581 acres to 41,146 acres) boundaries. A Draft MEIR was originally released in October 2007, for which the Department provided written comments. The City of Coalinga (City) has decided to pursue an alternative land use scenario which is included in this updated MEIR. 2.1

The Department is pleased and encouraged to note the City's inclusion of Policy OSC1-5, which addresses the City's goal of continuing to work towards completion of the Coalinga Habitat Conservation Plan (CHCP). In addition to this policy, the General Plan requires the City to coordinate with appropriate agencies to complete the CHCP process once the General Plan has been approved. As discussed in our September 7, 2007 comment letter on the initial MEIR, CHCP planning and implementation will result in significant landscape-level conservation. The Department welcomes the opportunity to continue to work with the City and the United States Fish and Wildlife Service in completing the CHCP. 2.2

As was also noted in our previous comment letter, prior to the completion of the CHCP, project-specific Incidental Take (2081) Permits are required **in addition to** mitigation. For projects within and outside the General Plan area that may result in "take" of 2.3

Conserving California's Wildlife Since 1870

State-listed species, an Incidental Take Permit would be needed and the applicant would need to: 1) provide an analysis of the impact of the proposed taking; 2) provide an analysis of whether issuance of an Incidental Take Permit would jeopardize the continued existence of the covered species; 3) propose measures that minimize and fully mitigate the impacts of the proposed taking; 4) provide a proposed plan to monitor compliance with the minimization and mitigation measures; and 5) provide a description of the funding source and level of funding available for implementation of the minimization and mitigation measures. Absent the type of legal agreement that accompanies an HCP and Implementing Agreement, payment of fees to the City for projects would not meet the Department's Fully Mitigate standard required for Incidental Take Permit issuance. In general, Incidental Take Permits require implementation of avoidance, minimization, and mitigation measures. In general, mitigation involves the protection in perpetuity (via conservation easements or fee title held by the Department) of in-kind (or better) habitat of an acreage deemed appropriate by the Department relative to the amount of acreage to be impacted. In addition, a per-acre enhancement and endowment fee is also necessary. The enhancement fee is to "improve" the habitat via fencing, debris removal, etc., and the endowment is placed in a non-wasting account that allows the property to be managed via the generated interest. The Department typically requires that the Department hold the endowment fees. 2.3 (cont'd)

The following species-specific comments were included in the September 7, 2007 comment letter and are included again as they still apply to the MEIR.

Blunt-Nosed Leopard Lizard (BNLL): This species is known to occur within and adjacent to the General Plan area, including but not limited to the Department's Pleasant Valley Ecological Reserve. Because the BNLL is fully protected and, therefore, no "take" incidental or otherwise can be authorized by the Department, protocol-level surveys must be conducted prior to any project-specific ground-disturbing activities in all areas of suitable habitat. Suitable habitat includes all grassland and shrub scrub habitat that contains required habitat elements, such as small mammal burrows. In areas where all ground-disturbing activities will completely avoid (by a minimum distance of 30 feet) small mammal burrows, protocol-level surveys would not be required. These surveys, the parameters of which were designed to optimize detectability, must be conducted to reasonably assure the Department that "take" of this fully protected species will not occur as a result of individual project implementation within the General Plan area. In the event that this species is detected during protocol-level surveys, consultation with the Department is warranted to discuss how to implement individual projects and avoid "take." 2.4

San Joaquin Kit Fox: This species is known to occur throughout the General Plan area, including within the existing urbanized areas of the City. It is important that measure OSC1-3.1 (biological resources evaluation) be conducted on all proposed 2.5

project sites, even in-fill lots. In certain portions of the remaining kit fox range where there are localized high densities of kit fox and sufficient areas of remaining open space, such as within western Kings, Fresno, and Kern Counties, kit fox are known to forage and den within urbanized areas. There is some indication that urban and suburban populations of kit fox may be significant to the species' long-term survival. In communities such as Bakersfield, Taft, Avenal, and Maricopa, kit foxes commonly utilize almost any open space for denning and foraging, including but not limited to canals, vacant lots, commercial and light industrial developments, railroad, power, and other utility right-of-ways (ROWs), parks, golf courses, schools, and stormwater retention basins/sumps. Residential developments are used to a much lesser extent, likely because of the movement barriers posed by multiple and frequent fencing. The Department knows less about the status of foxes in the City since there have not yet been any focused research efforts in the area, but public reports and occasional kit fox related incidents requiring Department intervention indicate that there is a consistent urban kit fox population within Coalinga. In addition to conducting a Biological Resources Evaluation for proposed projects, immediately prior to project-specific ground-disturbing activities, the Department recommends that the "Standardized recommendations for protection of the San Joaquin kit fox prior to or during ground disturbance"(USFWS, 1999) be followed, prior to any ground-disturbing construction or maintenance activities occurring within the General Plan area. If known, active, or natal kit fox dens are detected during the Biological Resources Evaluation or during pre-activity surveys, the results of these surveys should be submitted to the Department prior to any ground-disturbing activities so that project-related "take" potential can be adequately determined. If "take" cannot be avoided, acquisition of a State Incidental Take Permit would be required prior to project implementation. Maintenance activities of public open space (such as golf courses, rights-of-way, parks) should be periodically reviewed for their potential for "take" or adverse impacts on kit fox.

2.5 (cont'd)

If you have any questions regarding these comments, please contact Justin Sloan, Environmental Scientist, at the address provided on this letterhead or by telephone at (559) 243-4014, extension 216.

Sincerely,

Jeffrey R. Single, Ph.D.
Regional Manager

cc: See Page Four

cc: State Clearinghouse
Office of Planning and Research
1400 Tenth Street
Sacramento, California 95812-3044

Susan Jones
United States Fish and
Wildlife Service
2800 Cottage Way, W-2605
Sacramento, California 95825

Literature Cited

USFWS 1999. Standardized Recommendations for Protection of the San Joaquin Kit Fox Prior to or During Ground Disturbance. U.S. Fish and Wildlife Service.

2. State of California Department of Fish and Game, Central Region

2.1 Thank you for reviewing both the General Plan Update and the EIR, and comment noted that the Department provided written comments on the original 2007 Draft EIR. The EIR preparers appreciate the responses from the Department of Fish and Game. Please also refer to the response to comments in the CDFG previous letter dated September 7, 2007.

2.2 Comment noted that the Department concurs with Policy OSC1-5 that addresses the City's goal of continuing to work towards completion of the CHCP. Comment noted that the Department welcomes the opportunity to continue to work with the City and the U.S. FWS in completing the CHCP. It is the City's intent to complete the CHCP process, and plans to contact the Department once the General Plan Update is completed.

2.3 Comment noted that permits are required in addition to mitigation contained in the EIR and GPU if any project would result in incidental take of a listed species. The comment letter details out the Incidental Take Permit process. This process will be included in the HCP and in any additional manuals or procedures the City develops to enforce the HCP process.

2.4 Comment noted that the fully protected Blunt-nosed leopard lizard (BNLL) lizard is known to occur within the general plan area, and that no "take" can be authorized by the CDFG. The discussion of suitable habitat and procedures for surveying the BNLL will be included in the CHCP, and the City has indicated its willingness to enforce the CESA with regard to fully protecting this species.

2.5 Comments noted with regard to Mitigation Measure OSC1-31 and that biological surveys be conducted on all proposed project sites, including infill lots. The kit fox is found in the General Plan area. The City has indicated its willingness to require kit fox studies on all projects within the City limits that have the appropriate habitat. The City will include in the CHCP the "Standardized recommendations for protection of the San Joaquin kit fox prior to or during ground disturbance" (USFWS, 1999). The City also understands that the CDFG wishes to receive all surveys so that project-related "take" potential can be adequately determined. If "take" can not be avoided, acquisition of a State Incidental Take Permit would be required prior to project implementation.

STATE OF CALIFORNIA—BUSINESS, TRANSPORTATION AND HOUSING AGENCY ARNOLD SCHWARZENEGGER, Governor

DEPARTMENT OF TRANSPORTATION
DISTRICT 6
1352 WEST OLIVE AVENUE
P.O. BOX 12616
FRESNO, CA 93778-2616
PHONE (559) 445-5868
FAX (559) 488-4088
TTY (559) 488-4066

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December 23, 2008

2131-IGR/CEQA
6-FRE-GEN
MASTER EIR/G.P. UPDATE
SCH 2002061026

Mr. Bill Skinner
City of Coalinga
C/O Mary B. Reents
Morro Group, Inc.
1422 Monterey Street, Suite C200
San Luis Obispo, CA 93401

Dear Mr. Skinner:

We have completed our review of the Master Environmental Impact Report for the proposed City of Coalinga General Plan Update 2005-2025. Under this general plan, it is anticipated that the city's population would increase from approximately 12,000 residents to approximately 56,000 residents by the year 2025. The city's area-of-interest would increase from the current 18,410-acres to 53,580-acres. **3.1**

Implementation Measure C1-5.2 requires that the City develop an access management plan. Over the past several years, Caltrans has given significant direction regarding access to State highways located within the City's sphere-of-influence. It is recommended that the City make the development of such an access management plan a top priority for adoption within the coming year. It is further recommended that Caltrans be given the opportunity to review drafts of such a plan prior to it being adopted as an official document. In addition, it is recommended that the plan address access issues beyond only driveways. Specifically, it is recommended that plan address issues regarding spacing and signal control of public road intersections along State highways. **3.2**

The current Route Concept Report for State Route (SR) 33 indicates that the majority of the route that is within the proposed sphere-of-influence will remain a 2-lane conventional highway. The segment of SR 33 that is located between 5th Street and Phelps is an urban 4-lane conventional highway. The intersection at Phelps is currently the only SR 33 intersection with signal control. Since the intersections at 3rd Street and 5th Street currently have all-way stop control, it is highly likely that they will be signalized in the future. It is recommended that the City develop a mechanism for funding improvements to these two intersections. **3.3**

"Caltrans improves mobility across California"

The current Transportation Concept Report for SR 198 indicates that the majority of the route that is within the proposed sphere-of-influence will remain a 2-lane conventional highway. The segment of SR 198 that is located between Polk and 5th Street is an urban 4-lane conventional highway. The intersection at Polk is currently the only SR 198 intersection with signal control. **3.4**

It is recommended that signalized intersections located outside the downtown area should be spaced no closer than 1/2-mile from center to center. Collector roads could then be located between the signalized intersections at 1/4-mile spacing. It is recommended that the spacing of adjacent driveways located along State highways should be determined based on the speed of the roadway and the urban or rural nature of the immediate area. It is also recommended that the spacing be consistent with Table 10-5 (Minimum Access Spacing) of the ITE Traffic Engineering Handbook 5th Edition. Further, it is recommended that the spacing between adjacent driveways be measured from center to center. In addition, it is recommended that the spacing between a driveway and a public road intersection should be determined based on the speed of the roadway and the size and nature of the development that would be using the driveway. The spacing should be consistent with Table 10-6 (Minimum Corner Clearance) of the ITE Traffic Engineering Handbook 5th Edition. It is recommended that the spacing between a driveway and a public road intersection should be measured from the near side of the driveway to the near side of the lesser road intersecting the main roadway. **3.5**

Previous traffic studies have identified the need for future signal control at the SR 33 intersections of Jayne Avenue, Juniper Ridge Boulevard (intersection lighting only), 5th Street, 3rd Street, and Cambridge Avenue. As development has occurred in Coalinga, Caltrans has been consistent in reminding the City of the need for future improvements to these intersections in order to accommodate growing demand. Caltrans has also been consistent in requesting that these developments mitigate their impacts to the locations by contributing their proportional share for these improvements. At the intersection of SR 33 and Garfield Street, a large proposed development along Warthan Creek was identified in a traffic study as being required to install signals at this intersection as an opening-day requirement. That same traffic study for that same development also indicated that that development would be required to install signals at one of the main driveways accessing SR 33 as an opening-day requirement. In addition, it was determined that the SR 33 bridge over Warthan Creek would need to widened in order to accommodate projected future demand. It was determined that future developments would also need to mitigate their impacts to this location by contributing their proportional share for this widening. **3.6**

The traffic study portion of this MEIR has reaffirmed previous assessments by Caltrans that the projected future volumes on the segment of SR 33 between Garfield Street and Alpine Avenue would likely exceed the capacity of a future four-lane highway. Although there might be a need for additional lanes along this segment of SR 33, Caltrans thought it was unlikely that the facility would ever be expanded beyond four lanes. Therefore, Caltrans concurs with Implementation Measure C1-3.3. This measure requires that the City establish **3.7**

a new east-west collector in order to lower projected impacts to a portion of this segment of SR 33.

Please be advised that any future development adjacent to a State Route, whether the entitlement is deemed by the lead agency to be discretionary or ministerial should be sent to Caltrans for review. Also, please send a response to our comments prior to staff's recommendations to the Planning Commission and the City Council. If you have any questions, please call me at (559) 445-5868.

3.7 (cont'd)

Sincerely,

MICHAEL NAVARRO
Office of Transportation Planning
District 06

"Caltrans improves mobility across California"

3. State of California Department of Transportation

3.1 Thank you for commenting on the Draft Master EIR for the proposed City of Coalinga General Plan Update. Comment noted that District 6 has reviewed the documents. The City appreciates the time you have spent with them in reviewing the General Plan Update.

3.2 Comment noted with regard to Implementation Measure C1-5.2 that requires the City to develop an access management plan. Comment noted that Caltrans has made development of access management plan a top priority. The City has included a SR 33 Access Management Plan as a subsequent project under the Master EIR. This plan should be developed within two years of General Plan adoption; the City intends to coordinate with Caltrans during development of this plan. However, the City does not have the funds at present to prepare the plan.

3.3 Comments noted with regard to the current Route Concept Report. The City will develop a mechanism for funding improvements to SR 33 intersections and SR 198 that are specified within this comment letter.

3.4 Comment noted with regard to SR 198 status as a 2-lane conventional highway with a segment of SR 198 as an urban 4-lane highway, and that the Polk Avenue intersection is currently the only SR 198 intersection with signal control.

3.5 Comments noted with regard to signalized intersection spacing and other spacing issues. The City will take these recommendations into consideration during design review and evaluation.

3.6 Comment noted with regard to improvements needed along SR 33. The City is aware of the need for these improvements and will condition project to participate in traffic impact fees as set up under the General Plan and consistent with the Sr 33 Route Concept Report.

3.7 Comment noted with regard to Caltrans review of any future development projects adjacent to a state route. The City will send a copy of these comments no later than ten days prior to the City Council public hearing on the General Plan Update and Master EIR.

12/31/2008 13:15 5599355912 CITY OF COALINGA PAGE 02

STATE OF CALIFORNIA—BUSINESS, TRANSPORTATION AND HOUSING AGENCY ARNOLD SCHWARZENEGGER, Governor

DEPARTMENT OF TRANSPORTATION
DIVISION OF AERONAUTICS – M.S.#40
1120 N STREET
P. O. BOX 942873
SACRAMENTO, CA 94273-0001
PHONE (916) 654-4959
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TTY 711

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Flex your power!
Be energy efficient!

December 26, 2008

Mr. Bill Skinner
City of Coalinga Community Development Department
155 West Durian Avenue
Coalinga, CA 93210

Dear Mr. Skinner:

Draft Master Environmental Impact Report for the City of Coalinga 2025 General Plan Update;
SCH# 2002061026

The California Department of Transportation (Caltrans), Division of Aeronautics (Division), reviewed the above-referenced document with respect to airport-related noise and safety impacts and regional aviation land use planning issues pursuant to the California Environmental Quality Act (CEQA). The Division has technical expertise in the areas of airport operational safety and airport land use compatibility. We are a funding agency for airport projects and we have permit authority for public-use and special-use airports and heliports. **4.1**

The proposal is for an update to the City of Coalinga General Plan Update. As discussed in the Draft Master Environmental Impact Report, Coalinga Municipal Airport within the City of Coalinga. **4.2**

As we stated in our September 4, 2007 comment letter (enclosed), "In accordance with Public Utilities Code (PUC) Section 21676, local general plans and any amendments must be consistent with the adopted airport land use compatibility plans developed by the Fresno County Airport Land Use Commission (ALUC)." The proposal must be submitted to the Fresno County ALUC for a consistency determination.

The protection of airports from incompatible land use encroachment is vital to California's economic future. Coalinga Municipal Airport should be protected through effective airport land use compatibility planning and awareness. Although the need for compatible and safe land uses near airports in California is both a local and a state issue, airport land use commissions and airport land use compatibility plans are key to protecting an airport and the people residing and working in the vicinity of an airport. Consideration given to the issue of compatible land uses in the vicinity of an airport should help to relieve future conflicts between airports and their neighbors. **4.3**

The Caltrans Airport Land Use Planning Handbook (Handbook) provides a "General Plan Consistency Checklist" in Table 5A and a "Possible Airport Combining Zone Components" in Table 5B. The Handbook is a resource that should be applied to all public use airports and is available on-line at http://www.dot.ca.gov/hq/planning/aeronaut/. **4.4**

These comments reflect the areas of concern to the Division with respect to airport-related noise and safety impacts and regional airport land use planning issues. We advise you to contact our Caltrans **4.5**

Signed

District 6 Fresno office concerning surface transportation issues.

Thank you for the opportunity to review and comment on this proposal. If you have any questions, please call me at (916) 654-5314.

Sincerely,

Original Signed by

SANDY HESNARD
Aviation Environmental Specialist

Enclosure

c: State Clearinghouse, Fresno County ALUC, Coalinga Municipal Airport

4. State of California Department of Transportation, Division of Aeronautics

4.1 Thank you for commenting on the Draft Master EIR for the proposed City of Coalinga General Plan Update. Comment noted that the Caltrans Division of Aeronautics reviewed the Draft Master EIR and the General Plan Update, and that the Division is the funding and permitting agency for airport projects. The City thanks you for your time in reviewing the EIR and General Plan Update as it relates to airport issues. Please note that the City has incorrectly shown the Sphere of Influence boundary around the airport; the errata provided at the beginning of the Response to Comment section shows the correct SOI boundary.

4.2 Comment noted regarding the submittal of a comment letter on the original Draft Master EIR. Please also refer to response to comments on this 2007 letter. The City understands that the General Plan Update must be consistent with the adopted airport land use compatibility plans developed by the Fresno County Airport Land Use Commission (ALUC). The City recognizes that the General Plan Update will require review by various agencies, including the ALUC and LAFCO to ensure consistency with region-wide plans. The City's Airport Master Plan is in the process of revision, and the two documents will be reviewed for consistency.

4.3 Comment noted that the Coalinga Municipal Airport should be protected through effective airport land use compatibility and awareness. The City realizes that there are many compatibility issues surrounding the airport and the City is working toward resolution of these issues.

4.4 Comment noted with regard to the Caltrans Airport Land Use Planning Handbook, and that there is a General Plan Consistency Checklist.

4.5 Comment noted with regard to general compatibility issues related to air quality and noise as they pertain to airport land use. The City also has received a letter from Caltrans District 6 Transportation Division with regard to the Master EIR and General Plan Update; please refer to the comments and responses from Caltrans District 6 Transportation Division.

12/31/2008 15:29 5599355912 CITY OF COALINGA PAGE 05

Arnold Schwarzenegger, Governor

STATE OF CALIFORNIA

NATIVE AMERICAN HERITAGE COMMISSION

915 CAPITOL MALL, ROOM 364
SACRAMENTO, CA 95814
(916) 653-6251
Fax (916) 657-5390
Web Site www.nahc.ca.gov
e-mail: ds_nahc@pacbell.net

RECEIVED
DEC 31

December 29, 2008

Mr. Bill Skinner
CITY OF COALINGA
155 West Durian Avenue
Coalinga, CA 93210

Re: SCH#2002061026 and SCH#2005021140; CEQA Notice of Completion; draft Environmental Impact Report (DEIR) for the Master Environmental Impact Report (DEIR), City of Coalinga 2025 General Plan Update; Fresno County, California

Dear Mr. Skinner:

The Native American Heritage Commission (NAHC) is the state 'trustee agency' pursuant to Public Resources Code §21070 designated to protect California's Native American Cultural Resources. The California Environmental Quality Act (CEQA) requires that any project that causes a substantial adverse change in the significance of an historical resource, that includes archaeological resources, is a 'significant effect' requiring the preparation of an Environmental Impact Report (EIR) per the California Code of Regulations §15064.5(b)(c)(f) CEQA guidelines). Section 15382 of the 2007 CEQA Guidelines defines a significant impact on the environment as "a substantial, or potentially substantial, adverse change in any of physical conditions within an area affected by the proposed project, including ...objects of historic or aesthetic significance." In order to comply with this provision, the lead agency is required to assess whether the project will have an adverse impact on these resources within the 'area of potential effect (APE)', and if so, to mitigate that effect. To adequately assess the project-related impacts on historical resources, the Commission recommends the following action:

√ Contact the appropriate California Historic Resources Information Center (CHRIS) for possible 'recorded sites' in locations where the development will or might occur.. Contact information for the Information Center nearest you is available from the State Office of Historic Preservation (916/653-7278)/ http://www.ohp.parks.ca.gov. The record search will determine:

- If a part or the entire APE has been previously surveyed for cultural resources.
- If any known cultural resources have already been recorded in or adjacent to the APE.
- If the probability is low, moderate, or high that cultural resources are located in the APE.
- If a survey is required to determine whether previously unrecorded cultural resources are present.

√ 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.

- 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 pubic disclosure.
- The final written report should be submitted within 3 months after work has been completed to the appropriate regional archaeological Information Center.

√ The Native American Heritage Commission (NAHC) performed:

- A Sacred Lands File (SLF) search of the project 'area of potential effect (APE)': The results: No known Native American Cultural Resources were identified.; However the NAHC SLF is not exhaustive and local tribal contacts should be consulted from the attached list.
- The NAHC advises the use of Native American Monitors, also, when professionAL archaeologists or the equivalent are employed by project proponents, in order to ensure proper identification and care given cultural resources that may be discovered. The NAHC, FURTHER, recommends that contact be made with Native American Contacts on the attached list to get their input on potential IMPACT of the project (APE) on cultural resources.. In some cases, the existence of a Native American cultural resources may be known only to a local tribe(s) or Native American individuals or elders.

√ Lack of surface evidence of archeological resources does not preclude their subsurface existence.

- Lead agencies should include in their mitigation plan provisions for the identification and evaluation of accidentally discovered archeological resources, per California Environmental Quality Act (CEQA) §15064.5 (f). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American, with knowledge in cultural resources, should monitor all ground-disturbing activities.
- Again, a culturally-affiliated Native American tribe may be the only source of information about a Sacred Site/Native American cultural resource.

5.1

5. State of California Native American Heritage Commission

5.1 Thank you for commenting on the Draft Master EIR and General Plan Update. This letter is a standard description of the duties of the NAHC as a trustee agency. No further comment is necessary.

County of Fresno

Department of Public Works and Planning
Alan Weaver, Director

January 2, 2009

City of Coalinga
Mr. Bill Skinner, City Manager
c/o Mary B Reents
Morro Group, Inc.
1422 Monterey Street, Ste. C200
San Luis Obispo, CA 93401

SUBJECT: NOTICE OF AVAILABILITY OF THE CITY OF COALINGA MASTER ENVIRONMENTAL IMPACT REPORT

Dear Ms. Reents:

The County of Fresno appreciates the opportunity to review and comment on the City of Coalinga's Draft Master Environmental Impact Report (MEIR) for the Coalinga General Plan Update and concurs with the list of potential impacts identified in the document. Based on the County's review of the project, the following comments are offered for your consideration: 6.1

Circulation:

Transportation Circulation (TC) Impact 2 under "Transportation and Circulation" states that "Implementation of the proposed General Plan would result in a substantial increase in the number of vehicle trips, and contribute to an exceedence of LOS standards established by the County of Fresno". Under "Mitigation Measures in the Proposed General Plan" it states that "New policies in the proposed General Plan and their associated implementation measures would reduce potential impacts, but not to a less than significant level". 6.2

Individual projects should provide this County with a Traffic Impact Study to determine those cumulative impacts and each development should pay its fair share to reduce those impacts to a less than significant level.

General Comments:

The population figure of 12,000 in the November 2008 City of Coalinga DMEIR General Plan Update 2025 is outdated information. The California Department of Finance shows a population of 19,063 for the City of Coalinga for January 2008. The tables and charts that are examined below have errors, unsubstantiated baseline figures and numbers that over or under-inflate facts and figures. 6.3

DEVELOPMENT SERVICES DIVISION
2220 Tulare Street, Sixth Floor / Fresno, California 93721 / Phone (559) 262-4055 / 262-4029 / 262-4302 / 262-4022 FAX 262-4893
Equal Employment Opportunity • Affirmative Action • Disabled Employer

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Williamson Act:

Approximately 6,683 acres of the subject area are currently restricted by Williamson Act Contracts. Cancellation of the Williamson Act Contracts would need to be completed prior to annexation of the subject property unless the City succeeds to the Contract(s) and/or prior to conversion to a non-agricultural use (or to a use not consistent with the Contract/Program). The Williamson Act cancellation process requires the property owner to submit an application and petition for cancellation with the County of Fresno. For additional information, please contact the Fresno County Department of Public Works and Planning, Development Services Division, Policy Planning Unit, at (559) 262-4022. 6.4

Conversion of Agricultural Lands:

The County supports the City's proposed Land Use Implementation Measure LU7-.2.1 which requires development projects to mitigate for loss of farmland by either granting a farmland conservation easement or payment of an in lieu fee to offset the cost of purchasing the farmland conservation easement at a 1:1 ratio. 6.5

In Table II-1 – "Significant and Unavoidable Impacts" on Page II-3, AG Impact 1 states the proposed General Plan would convert 3,528 acres of Prime Farmland and 1,007 acres of Farmland of Statewide Importance; however, on Page V-42; the figures are listed as 5,111 and 1,009 acres respectively. Also, under AG Impact 2 in Table II-1, the loss of 4,466 acres of Williamson Act farmland is mentioned, but Page V-46 lists the figure at 6,683 acres. 6.6

The City of Coalinga DMEIR General Plan Update 2025 (Update) has identified 7,892 acres as zoned for agriculture within the proposed Sphere of Influence (SOI). Of the 7,892 acres of farmland, approximately 5,111 acres are among the most productive agricultural land (Prime Farmland) in the County. Additionally, approximately 1,009 acres of land within the proposed SOI are designated Farmland of Statewide Importance. Due to the availability of water, ground quality, and high value crops grown on Prime Farmland, its average productive value exceeds that of the rest of the County; however, it is recognized that this area is designated for growth. This is a massive reduction of Prime Farmland and Farmland of Statewide Importance contiguous to the City of Coalinga. It is projected the Update's effect on Fresno County's prime agriculture land estimated at $5,200 per acre for 5,111 acres equals $26,577,200 annually in crop production loss. 6.7

There needs to be a clear understanding that agricultural operations that choose to stay in the area be allowed to continue all of their farming practices if the Update's plan proceeds. Additional restrictions aimed at restrictions of pesticide usage and other agricultural issues outside of the scope of current regulations should not be allowed. Farming issues are enacted in the California Food and Agriculture Code as enforced by the California Department of Food and Agriculture, the County Agricultural Commissioner's Office and the California Department of Pesticide Regulations. 6.8

It is recommended that a Right to Farm Covenant should be recorded and included in the individual property conveyance deeds. This is to preserve, protect, and encourage development of its agricultural land and industries for the production of food and other agricultural products and that the residents of said property should be prepared to accept the inconveniences and discomfort associated with normal farming activities.

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Coalinga Master Environmental Impact Report
January 2, 2009
Page 3

As your jurisdiction is likely aware, the Fresno County Council of Governments (COG) is currently developing a proposal for a Model Farmland Conservation Program (MFCP) with participation of its member cities, Fresno County and various private and non-profit sector representatives. Preservation and mitigation of areas designated strategic farmland is the focus of this effort. Although adoption of the MFCP or any variation of this program is still pending, Fresno County recommends that any development plans include provisions to allow implementation of the MFCP or variant if adopted. 6.9

Land Use, Population, and Housing:

As stated earlier, the population figure for the City of Coalinga is outdated and it appears Table V.F.-1 "Projected Population Growth 2005-2025" on Page V-56, may show under-inflated population growth figures. The outdated population figure issue also affects Table V.H.-3 "Anticipated Future Water Demand in Acre-Feet per Year" on Page V-90; Table V.H.-4 "Anticipated Future Wastewater Demand in Million Gallons per Day" on Page V-93; Table VI-1 "Maximum Residential Buildout Under 1994 General Plan" on Page VI-2; Table VI-2 "Acreage By Land Use Category and Maximum Residential Buildout, Alternative 2 – Reduced Buildout Alternative" on Page VI-3; and Table VI-3 "Maximum Residential Buildout, Alternative 3 – Reduced Acreage/Increased Density" on Page VI-4. 6.10

The County is concerned about the appropriateness of the Ranchette Residential (RCH) and Residential Estate (RE) land use designations described on Pages V-59 and 60. One of the major goals of the Fresno County General Plan is to protect the County's productive agricultural land by promoting compact, mixed-use and transit-oriented development within city spheres and directing new urban growth to cities. The Coalinga General Plan Update likewise contains policies and implementation measures to promote infill development and intensification of land uses, prevent sprawl and encourage smart growth and sustainable development. 6.11

Ranchette Residential (RCH) and Residential Estate (RE) land uses are essentially rural in nature and are not efficient land use designations in meeting projected population demands. Fresno County would recommend the removal of those land use designations from the Update and the re-designation of those lands to a more urban density residential designation. 6.12

Table V.F.-5 on Page V-64, lists the non-residential maximum build-out potential as a result of the update. This Table indicates the calculated potential number of jobs in Coalinga at full build-out. This information is of use in determining whether the proposed Update is likely to result in a jobs-housing balance. However, the text of the Update does not indicate why the calculations were based on an assumption that all non-residential land uses would generate four jobs per acre. 6.13

It seems unlikely that land designated for agriculture, open space and recreation would generate four jobs per acre of such uses. A possible method to calculate the potential jobs per acre for land use designations is to use the acreage and land use information in Table V.F.-6 and the Census 2000 Summary File 3 data. For example, Table V.F.-6 shows 1,275 acres designated for agriculture uses in the 1994 Coalinga General Plan. Census 2000 Summary File 3 (SF 3) for Coalinga, California, shows 669 people employed in agriculture, forestry, fishing, hunting and mining. To calculate the number of agriculture employees per acre, we divide the number of agriculture employees from the 2000 Census SF 3 (669) by the number of acres designated for agriculture in the 1994 Coalinga General Plan (1,275) which results in 6.14

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0.52 persons per acre. A sample Table V.F.-5 based on the above calculations and a copy of the 2000 Census SF 3 data are attached for your review. Please notice that the figures are much lower than the existing table that uses four persons per acre across the board. Also, note typos and addition errors for the total acres under the Future Growth Area (SOI) and the number of acres in the Total column for the CG, PF, and OS land use categories (the correct figures are shown in the sample Table V.F.-5). 6.15

On Table V.F.-6 on Page V-64, the percentage change in the numbers of acres designated for a given land use appears to be calculated incorrectly. As an example, the amount of land designated for Manufacturing/Business (MB) increased from 134 acres to 1,674.04 acres. This is an increase of 1,540.04 acres, and represents an increase of 1,249%, not 92% as shown in the Table. It seems Table V.F.-6 compares the proposed 2025 General Plan Update against the Acreage Increase (Decrease), instead of comparing the 1994 General Plan with the Acreage Increase (Decrease). Preparation of Table V.F.-6 in the prior manner under-inflates the increases and decreases proposed by the Update. A sample Table V.F.-6 is attached for your review that contrasts the 1994 General Plan with the proposed acreage increases or decreases of the Update. 6.16

Airport Land Use:

A portion of the subject area is within the review area of the Coalinga Municipal Airport Land Use Policy Plan. 6.17

Public Utilities Code (PUC) Section 21676(b) states that prior to the amendment of a general plan or specific plan, or the addition or approval of a zoning ordinance or building regulation within the planning boundary established by the airport land use commission pursuant to Section 21675, the local agency shall first refer the proposed action to the Airport Land Use Commission (ALUC) for review.

As a point of information, Public Resources Code Section 21096 includes requirements related to drafting of environmental documents for proposals located within two miles of a public use airport. The text of this Section and the electronic link are provided below.

Section 21096. (a) If a lead agency prepares an environmental impact report for a project situated within airport comprehensive land use plan boundaries, or, if a comprehensive land use plan has not been adopted, for a project within two nautical miles of a public airport or public use airport, the Airport Land Use Planning Handbook published by the Division of Aeronautics of the Department of Transportation, in compliance with Section 21674.5 of the Public Utilities Code and other documents, shall be utilized as technical resources to assist in the preparation of the environmental impact report as the report relates to airport-related safety hazards and noise problems.

(b) A lead agency shall not adopt a negative declaration for a project described in subdivision (a) unless the lead agency considers whether the project will result in a safety hazard or noise problem for persons using the airport or for persons residing or working in the project area.

http://www.leginfo.ca.gov/cgi-bin/displaycode?section=prc&group=21001-22000&file=21080-21098

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Coalinga Master Environmental Impact Report
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SOI Expansion/Annexation:

The City of Coalinga DMEIR General Plan Update 2025 proposes a SOI expansion that encompasses the Coalinga Municipal Airport and the Wastewater Treatment Plant. The Amended and Restated Memorandum of Understanding (MOU) between the County and the City of Coalinga and the Coalinga Redevelopment Agency was last updated on March 25, 2008. The March 25, 2008 MOU does not include the expanded SOI area and per Article IX, Section 9.2.A of the MOU, a revised MOU that includes the expanded SOI area will need to be renegotiated by all the parties. 6.18

The Fresno County Farm Bureau has provided comments relating to sphere of influence expansion and loss of prime agricultural land. I have attached their comment letter dated December 15, 2008. In addition, Fresno County Public Works and Planning may have additional comments. If you have any questions, please contact me at (559) 262- 4454. 6.19

Sincerely,

Briza Sholars, Planner
Development Services Division

BS:mac
G:\4360Devs&Pln\EnvPlan\OAR\City of Coalinga\MEIR\Comment Letter.doc

Attachments

c: Theresa Acosta-Mena, Senior Planner
Bernard Jimenez, Division Manager, Development Services
Stan Nakagawa, Design Division

JAN-02-2009 13:18 CO FRESNO DEPT PWP 559 262 4893 P.05

6. County of Fresno Department of Public Works and Planning, Development Services Division

6.1 Thank you for commenting on the Draft Master EIR and the General Plan Update. We appreciate the time you have spent looking at the General Plan Update and Master EIR and making the following comments.

6.2 Comment noted with regard to circulation issues. TC-Impact 2 does note that there will be substantial impacts to roads and intersections due to increased growth. Comment noted that the County wishes to receive Traffic Impact Studies (TIS) on all projects affecting county roads. Comment also noted that cumulative impacts should be evaluated and each development should pay its fair share to reduce impacts through various means. The City will require TIS on all substantial projects that affect county roads, and the City also is looking at the development fees for projects once the GPU is approved; various programs that would require development fees for mitigation are listed as subsequent projects in the Master EIR.

6.3 Comment noted with regard to 2008 population figures. The 2005 population figures are those that were used in the General Plan update and were the most recent figures at the time of the re-submittal of the Notice of Preparation. Please refer to the errata sheet that is part of the Final EIR; item 5 clarifies the population estimates and provides information with regard to the growth rate between 2005 and 2008. Please refer to Table V.F.-1 in the EIR and Table 2-3 in the General Plan that also gives the State Department of Finance population estimates for 2008 (errata item 7). Note that the population of 19,063 includes group quarters (predominately the prison population). Group quarters were omitted from planning since the state is responsible for their care.

6.4 Comments noted with regard to Williamson Act contracts. Vacant properties surrounding Coalinga are almost all under Williamson Act contracts. These contracts would require cancellation prior to development. Property owners would be required to petition the County for cancellation. The City understands that it takes ten years for the cancellation process. The proposed General Plan Update is a long term plan, and it is unlikely that properties would cancel for development until the ten year process has been completed.

6.5 Comment noted that the County supports LU7-2.1, which requires development projects to mitigate for loss of farmland by either granting a farmland conservation easement or payment of an in lieu fee to offset the cost of purchasing the farmland conservation easement at a 1:1 rate. The City understands that the Fresno County Council of Governments is preparing a Model Farmland Conservation Program, and the City has provided input into this program.

6.6 Comment noted that the farmland acreages are inconsistent. Please refer to the errata sheet item 29 for the corrected numbers.

6.7 Comment noted with regard to the total amount of crop loss from total development. This is a worst case estimate since it is unlikely that all designated properties would develop in the projected time frame of the General Plan Update. In addition, all of this farmland is not under production, so the amount of crop loss is a worst case projection. The EIR indicates that this is a significant and unavoidable impact, and overriding considerations would have to be made to address this overall loss. It should be noted that Coalinga, due to its location near the prison and state hospital, is under pressure to provide moderate income housing. The City does not have enough housing, and has developers ready to provide needed housing. Although the policies in the GPU direct housing as infill, it is more probable that housing would need to be provided within the SOI on lands with prime soils, since there is little to no land that is not designated as prime soils within the SOI. The needed housing meets the state's requirement to provide an increase in housing starts to meet statewide population growth, consistent with a reasonable jobs/housing balance. The City has indicated that the Housing Element must be updated consistent with state requirements and to bring the Housing Element update into the General Plan Update. It is listed as a subsequent project under the Master EIR. Jobs/Housing mix is a component of the Housing Element update. The City is planning to require mitigation to offset loss of agricultural lands when it has to utilize prime soils for development. Also, it is unlikely, given the rural lifestyles and characteristics of Coalinga that the City could "sell" the idea of high intensity development with the downtown to its citizens.

6.8 Comment noted that there needs to be clear understanding that farmlands may remain under Williamson Act contract. Please refer to LU7-1 that provides guidance recognizing the right of agriculture to exist and continue to operate in proximity to development.

6.9 Comment noted with regard to Fresno County COG developing a proposal for Model Farmland Conservation Program (MFCP). The City will review the MFCP when it is completed and may include provisions to allow implementation or a variant of this plan.

6.10 Comment noted with regard to population information. The 2005 population figures are those that were used in the General Plan update and were the most recent figures at the time of the re-submittal of the Notice of Preparation. Table V.F.-1 on page V-56 reflect the projected population as defined by the Department of Finance which is outlined in table 2-3 on page 2-8 of the proposed General Plan. Please note that the reasonably foreseeable or objective population at build-out is 55,373 as described on page 2-14 of the proposed General Plan. An errata sheet has been prepared on the Master EIR to make the necessary changes to population and land use tables and figures. The projected population by year based on this build-out objective population is outlined in item 6, Table III-2 of the errata sheet. Tables V.H.-3 and VH-4 have been adjusted accordingly in errata items 20 and 23. Table V.I.-1 is information from the 1994 General Plan and would not be affected by the population numbers for the 2025 General Plan build-out. Tables VI-2 and VI-3 are not impacted by population objective changes as these alternatives were developed based on the maximum residential build-out potential of 81,240 outlined in table 2-9 of the proposed general plan.

6.11 Comment noted with regard to appropriateness of the RCH and RE land use designations. The County's concerns are that these land uses are incompatible with protection of agricultural lands. Note that this is offset by the City's infill policies. The City understands the desire for RCH and RE land uses in preserving a rural community atmosphere and is striving to balance the requests of residents for this type of land use with the goals of sustainability and agricultural land preservation. The EIR preparer recommends that the City review these land use designations during public review with the potential for reducing these uses overall. The City residents wish to have a rural feel to the community, where agriculture is protected; but they also wish for rural residential where they can keep horses and other animals and their children can participate in rodeo events and raise farm animals. It is for this reason that RCH and RE land use designations have been included in the General Plan Update. The City will also consider multimodal trails so that residents can ride their horses to the rodeo facilities provided through West Hills Community College.

6.12 Comment noted that the County wishes the City to remove the RCH and RE land use designations and re-designate them to a more urban density residential designation. Please refer to response 6.11 above.

6.13 Comment noted with regard to lack of supporting evidence of approximately 4 employees per acre. The 4 employees per acre was used by the land use consultant to give a worst case average number of jobs and considered all non-residential properties. Note that the 4 jobs per acre were based on based on 2005 Fresno Council of Gorvernments traffic model information used to estimate traffic generated by the General Plan Update. The City Council determined that it would be best to simplify the employment estimates to an average density of 4 employees per acre overall based on this information. However, it does appear that the employment estimates may be high, and we have amended the EIR and General Plan Update to show recreational, open space at no employees per acre and agriculture at the suggested 0.52 employees per acre.

There was a typo in Table V.F.-5, and the correct numbers are given in Table 2-10 in the General Plan Update. Refer to the errata sheet, item 8 for the table correction. In addition, please refer to the revised footnote in Table V.F.-5 and the revised table given in response 6.14 below.

6.14 Comment noted that it is unlikely that land designated for agriculture, open space and recreation would generate four employees per acre of uses. The EIR consultant concurs. The figures are based on the work effort for the General Plan Update. These are the numbers the City wished to evaluate in the EIR and are probably worst case. It would offset the numbers of employees that are generated at higher intensity uses that occur at the prison and state hospital. If the factor of 0.52 persons were used for agriculture, and no jobs allocated to recreation and open space, the total number of employees would be reduced as follows:

TABLE V.F.-5
Non-Residential Maximum Buildout Potential
(No Overlay Designation)

Land Use	City Limits		Future Growth Area (SOI)		TOTAL	
	Acres	Employees[1]	Acres*	Employees[1]	Acres	Employees[1]
CG	96	384	*70*	280	166	664
CS	99	396	89	356	188	752
MB	299	1,196	1,375	5,500	1,674	6,696
PF	1,894	7,576	456	1,824	*2,350*	9,400
REC	145	*0*	660	*0*	805	*0*
OS	286	*0*	958	*0*	*1,244*	*0*
AG	95	*49.4*	243	*126.36*	338	*175.76*
TOTAL	2,914	*9,601.4*	3,851	*8,086.36*	*6,765*	*17,687.76*

[1]Assumes 4.0 employees per acre of land for CG, CS, MB, PF, 0 employees per acre for REC and OS, and 0.52 employees per acre for AG. The 4.0 employees per acre is based on Fresno Council of Governments information used in the traffic modeling conducted in 2005.

Source: PMC, Existing Land Use Map (pmc_2006_lu_map_sp27_4.shp) March 2008

Change from Table 2-10

Please refer to errata sheet item 8 for revised Table 2-8 and Table V.F-5 in the Master EIR; these numbers have been corrected based on the overall number of 4 employees per acre.

6.15 Comment noted with regard to the County's calculation of 0.52 overall jobs per acre based on census information. Please refer to response 6.14 above.

6.16 Comments noted with regard to acreage errors. Please refer to errata sheet item 8 with regard to residential development; the table has been amended to reflect the numbers and percentages in the proposed General Plan Update Table 2-8 which corrects these miscalculations.

6.17 Comments noted with regard to ALUC jurisdiction. Please refer to Response letter from Caltrans Division of Aeronautics that addresses airport compatibility.

6.18 Comment noted that the County and City will need to revise the existing MOU to include the expanded SOI area.

6.19 Comment noted that the County submitted a letter from the Fresno County Farm Bureau. It is included herein with responses; see below. It is also noted that the County may have additional comments. The Coalinga City Council will have a public hearing on the General Plan Update and Master EIR; the County is welcome to attend this hearing and provide additional comments. In addition, the General Plan Update will be reviewed by

the LAFCO and the Airport Land Use Commission; the County is also invited to provide comments at those hearings during the public hearing process.

DEC 26 2008

County of Fresno
Department of Public Health
Edward L. Moreno, M.D., M.P.H., Director-Health Officer

December 23, 2008

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LU0013989
PE 2600

Bill Skinner
City of Coalinga-Manager
c/o Mary B. Reents
Morrow Group, Inc.
1422 Monterey St., Suite C200
San Luis Obispo, CA 93401-2954

Dear Mr. Skinner:

Project Name: **City of Coalinga Draft Master Environmental Impact Report General Plan Update 2025**

Thank you for the opportunity to review the above noted document. The Fresno County Department of Public Health, Environmental Health Division has no comments at this time but requests that a copy of the Final Environmental Impact Report be provided to this department upon circulation. **7.1**

Sincerely,

Glenn Allen, R.E.H.S.
Environmental Health Specialist III
Environmental Health Division

ga

cc: Briza Sholars, Development Services Division

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7. County of Fresno Department of Public Health, Environmental Health Division

7.1 Thank you for commenting on the Draft Master EIR and General Plan Update. Comment noted that the Environmental Health Division has no comments at this time but wishes a copy of the final documents.

LAFCO Fresno Local Agency Formation Commission

DEC 19 2008

December 11, 2008

Mr. Bill Skinner, Coalinga City Manager
c/o Mary B. Reents
Morro Group, Inc.
1422 Monterey Street, Suite C200
San Luis Obispo, CA 93401

Dear Mr. Skinner:

Subject: ***Draft Master Environmental Impact Report for the City of Coalinga 2025 General Plan Update***

We have reviewed the City of Coalinga's Draft 2025 General Plan Update and the associated Draft Master Environmental Impact Report (MEIR). We note that Fresno LAFCo submitted comments for a previous iteration of the City of Coalinga's Draft General Plan Update and Draft MEIR on September 10, 2007, and comments on an addendum to these documents on September 17, 2007. It does not appear that a number of our comments and recommendations were acknowledged as certain factual errors identified in each of the documents remain. These same comments are repeated or summarized here in addition to providing new comments. Copies of these prior comment letters are also enclosed for your reference. 8.1

For the sake of clarity, the following comments address the City's 2025 General Plan Update and the Draft MEIR separately.

2025 General Plan Update:

1. The General Plan (page 2-4) incorrectly states that the City's Area of Interest (AOI) is an informal designation "*established by LAFCo….*" LAFCo does not have authority to establish an AOI, nor would the City's existing or proposed AOI be considered relevant by the Commission when reviewing organization or reorganization proposals which might be submitted for approval by LAFCo. Any special consideration given to development projects proposed outside the City's 8.2

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Phone: (559) 495-0604 • Fax: (559) 495-0655 • E-mail: cfleming@co.fresno.ca.us

SOI, but within the AOI, over which LAFCo has no authority, is strictly between the County and the City.

2. Table 2-1 indicates the City's current boundary encompasses 4,541 acres, and that its SOI encompasses 6,829 acres. LAFCo records indicate the area encompassed by the City equals 3,812 acres and the SOI encompasses 5,514 acres. This same discrepancy appears in a number of places throughout the document and should be corrected. **8.3**

   For the sake of clarity, it should be noted that the incorporated City area is included within the City's SOI. As such, unless the context suggests otherwise, when LAFCo identifies the City's *total* SOI acreage it should be understood that this total includes that portion of the SOI that is also within the City's boundaries.

3. Figure 1-1 and a number of other Figures in the General Plan show a much larger area around the Coalinga Airport as having been annexed to the City than do LAFCo records. This discrepancy should be corrected. A map showing the correct boundary is enclosed. **8.4**

4. The "Population and Growth" discussion beginning on page 2-7 describes different possible growth scenarios at great length with the end result being that the City assumes that all currently "foreseeable development" and "possible future development" as identified in Table 2-4 will be completed by 2025. If this were to occur, the City estimates that 14,719 dwelling units would be constructed and population would increase from an estimated 11,217 in 2005, to 55,373 in 2025. This is equivalent to an average annual growth rate that is greater than 8%. **8.5**

   Though the General Plan describes how this potential population may be reached, these growth assumptions would appear to be extremely optimistic at best as they are significantly greater than the City's historic trend and more than double California Department of Finance estimates which are at 3.2% in 2005, then peak at 4% in 2013 and 2014, and then drop to 3.0% from 2021 to 2025 for a total population estimate of 22,188. Further, the City's growth rate assumptions do not take into account the lack of available or foreseeable water supplies to serve such a population (see Point No. 4 in the Draft MEIR Section below). **8.6**

5. The City proposes an amended SOI that is a total of 12,433 acres in size (including the incorporated area) that is an increase of 2.4 times the size of the current SOI. Assuming the California Department of Finance population estimates are accurate, at current density levels (3.2 persons per acre), the City would need a total of 6,934 acres to accommodate the estimated 2025 **8.7**

population, only 25% larger than its existing SOI and approximately 55% of the proposed SOI.

8.7 (cont'd)

Given this information, the Commission may not be able to find that the proposed SOI is consistent with LAFCo's Policy Section 330-08, as listed below:

> *The Commission requests that a Sphere of Influence update be comprehensive and based on historical growth patterns, using a twenty to twenty-five year projection, prepared with a city and county general plan update for the community.*

6. LAFCo's primary tasks include promoting orderly development and *"balancing that development with sometimes competing state interests of discouraging urban sprawl, preserving open space and prime agricultural lands…."*

8.8

As indicated in the General Plan, a substantial portion of the area to be included within the City's proposed SOI is considered either "Prime Agricultural Land" or "Farmland of Local Importance". It is understood that in order for the City to develop in a logical and orderly manner, annexation of agricultural lands is inevitable. The efficient use of this land, therefore, is of great importance to LAFCo. LAFCo Policy Section 103 states, *"The Commission encourages well-planned, orderly, and compact urban development patterns for all developing areas."* Policy Section 104 further states: *"Proposals which would conflict with the goals of maintaining the physical and economic integrity of open space lands, agricultural lands,…as indicated in the City or County General Plan shall be discouraged."*

The proposed SOI will be considered in light of these policies. It should be noted that the City's Residential Ranchette (RR) land use designation which allows a maximum of one residence per 10 acres and the City's Residential Estate (RE) land use designation which allows a maximum of two residences per acre are not considered "compact urban development".

8.9

7. In addition to comments made in Point 6, above, you may be aware of the "Valley Blueprint" which is a Regional Land Use Planning effort currently being carried out under the auspices of the Council of Fresno County Governments (COG) and the other seven San Joaquin Valley counties. Preliminary recommendations of the "Blueprint" foresee a much greater average density than that envisioned in Coalinga's Draft General Plan--especially as it concerns large residential parcels such as the City's proposed RR and RE residential areas. The Fresno COG's Draft "Blueprint" portion of the plan is currently recommending an average residential density of eight dwelling units per acre in Fresno County.

8.10

Should the Blueprint be adopted by Fresno COG, LAFCo will consider the goals and principles of the Blueprint when it evaluates City projects. While we do not

8.11

believe that large lot single-family residential developments would necessarily be disallowed, lots as large as those identified in the RR and RE designated areas could make it difficult for the City to adhere to the Blueprint density principles. This will be part of LAFCo's consideration when presented with future annexation proposals. **8.11 (cont'd)**

8. It should be noted that Fresno COG is also sponsoring a "Model Farmland Conservation Program" with the overall goal intended to meet LAFCO's stated goal of preserving agricultural and open space lands. Preliminary recommendations that are currently being considered by the COG and its member agencies would recommend that City residential densities be increased in order to reduce the amount of agricultural lands taken out of production and urbanized. **8.12**

   The Model Farmland Conservation Program efforts may also recommend certain criteria be satisfied as part of any SOI expansion. These recommendations may include consideration of historical growth rates and proposed average densities described in the "Blueprint", which would be used to determine a City's land need for the following 20 years growth. If these principles are adopted, the City of Coalinga's proposed SOI would be considered significantly larger than would be recommended by the Blueprint. LAFCo may consider the Model Farmland Conservation Program recommendations at such time as the City submits a SOI update proposal.

9. The General Plan (pages 3-12) anticipates that all of the agricultural land under Williamson Act contracts within the proposed SOI will be converted to urban use and removed from the Williamson Act Program by 2025. Please note that the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000 has much to say regarding inclusion of land under Williamson Act contract into a City's SOI, or annexation of such land by the City. The City may be required to succeed to the contract, or to terminate the contract. If the City elects to terminate a contract, such termination must be approved by the County Board of Supervisors. Additionally, substantial penalties are levied by the State for termination of contracts. **8.13**

Draft Master Environmental Impact Report

1. Similar to the Draft General Plan, the Draft MEIR incorrectly identifies the existing incorporated area as including 4,541 acres and the SOI as including 6,829 acres. These errors are found on a number of pages and should be corrected to reflect an actual incorporated area of 3,812 acres and an SOI area of 5,541 (inclusive of the City). **8.14**

Additionally, we note that comments 5, 6, and 7 in the General Plan Comments section above also apply to the Draft MEIR (though page numbers may differ). We will not repeat these same comments in this section.

2. The Draft MEIR anticipates a 2025 population of 81,268 residents. This figure is identified on pages V-67, V-90, and VII-1. This figure is substantially larger than the General Plan population estimate of 55,373. It is unclear how the 81,268 figure was arrived at given the rationale used in the General Plan to arrive at a total 2025 population of 55,373. Further, a population of 81,268 would require average annual growth exceeding 10%, which would appear to be an extraordinarily high sustained growth rate. Regardless, the discrepancy between the two population figures should be reconciled or an explanation for the difference should be provided. **8.15**

It is important that accurate population estimates are utilized since the City's Master Service Plan will be developed based upon the population that public facilities are designed to serve. Additionally, we note that Table V.H.-3 includes the General Plan's population and water estimate figures which conflict with the water demand of 33,320 acre-feet per year identified on page V-90. **8.16**

3. The Draft MEIR (page V-42) notes, *"Approximately 5,111 acres of lands outside of the current City limits and within the proposed SOI are designated Prime Farmland."* In addressing potential impacts to agriculture, the Draft Master Environmental Impact Report (page V-42) includes the California Department of Conservation's (CDC) definition of "Prime Farmland" and "Farmland of Statewide Importance." Please note that the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000 definition of "Prime Agricultural Land" differs from CDC's definitions of Prime Farmland and Farmland of Statewide Importance, and may be considered more inclusive than the CDC's definitions. For LAFCo purposes, the Draft MEIR must consider loss of Prime Agricultural Land as defined by the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000 (Government Code Section 56064), below: **8.17**

> *"Prime agricultural land" means an area of land, whether a single parcel or contiguous parcels, that has not been developed for a use other than an agricultural use and that meets any of the following qualifications:*
>
> *(a) Land that qualifies, if irrigated, for rating as class I or class II in the USDA Natural Resources Conservation Service land use capability classification, whether or not land is actually irrigated, provided that irrigation is feasible.*
>
> *(b) Land that qualifies for rating 80 through 100 Storie Index Rating.*

(b) Land that supports livestock used for the production of food and fiber and that has an annual carrying capacity equivalent to at least one animal unit per acre as defined by the United States Department of Agriculture in the National Handbook on Range and Related Grazing Lands, July, 1967, developed pursuant to Public Law 46, December 1935.

(d) Land planted with fruit or nut-bearing trees, vines, bushes, or crops that have a nonbearing period of less than five years and that will return during the commercial bearing period on an annual basis from the production of unprocessed agricultural plant production not less than four hundred dollars ($400) per acre.

(e) Land that has returned from the production of unprocessed agricultural plant products an annual gross value of not less than four hundred dollars ($400) per acre for three of the previous five calendar years.

8.17 (cont'd)

4. With regard to addressing impacts to agriculture we recognize and commend the City's approach toward mitigating the loss of agricultural land as a result of urbanization of lands surrounding the City through the use of conservation easements at a 1:1 ratio, or payment of in lieu fees (General Plan Implementation Measure LU7-2.1). Please note that LAFCo is in the process of developing agricultural preservation policies that may require similar measures. If policies adopted by LAFCo are more restrictive than the City's mitigation measures, LAFCo may condition approval of projects on these more restrictive measures.

8.18

5. The Draft MEIR (page V-83) states that the City of Coalinga has a contract, valid through 2010, which obligates the Bureau of Reclamation to furnish Coalinga with up to 10,000 acre feet of water annually. Should the City receive a full allotment of 10,000 acre feet, it could support a population up to 24,390 based on annual usage of 0.41 acre-feet/person (page V-90). The City's contract includes provisions for reducing the City's water allocation during periods of drought. Reductions are stated to be *"variable"* and *"based on the severity and duration of the drought."* Reductions may result during the second year of drought up to 50% of the City's historic use.

8.19

Further addressing the need to develop additional water supplies, the Draft MEIR on page V-91 states, *"Securing a permanent source to augment existing water supplies in order to facilitate anticipated growth will be necessary prior to annexation or other type of development approval".* This is an important point and LAFCo will review City proposals with this statement in mind.

8.20

It should also be noted that when the City revises its Sphere of Influence boundary, it will be required to provide an updated Master Service Plan that must identify all water resources which will serve existing and future developments.

6. The Draft MEIR (page VII-1), states *"The Proposed General Plan anticipates the City's projected level of growth, while avoiding harm to the environment and improving the overall quality of life in Coalinga, through the following guiding principals".* Included among these guiding principals is: *"Accommodating increases in population within a relatively small area as compared to the area encompassed in Coalinga's entire AOI."* 8.21

   This logic appears to be faulty. If a relatively small SOI is proposed in comparison to a large AOI, and the relatively small SOI is fully built-out in the future, build-out of the SOI would result in no less harm to the environment than it would if the SOI and AOI boundaries were identical. This statement should be deleted or revised such that it can be supported.

7. Page III-12 under the Sphere of Influence (SOI) Expansion Section indicates the proposed SOI is 11,724 acres in size. This statement conflicts with the 12,432 acre SOI identified in Table III-3 on the same page and elsewhere in the MEIR and the General Plan, as well as the 12,433 acre size SOI identified in the MEIR and in the General Plan. These differences need to be reconciled. At such time as the City submits its SOI Update application, there should be no question as to the size of the proposed SOI. 8.22

We look forward to receiving the copies of the Final MEIR and Coalinga's Updated General Plan. If you have any questions, please contact me at (559) 495-0604.

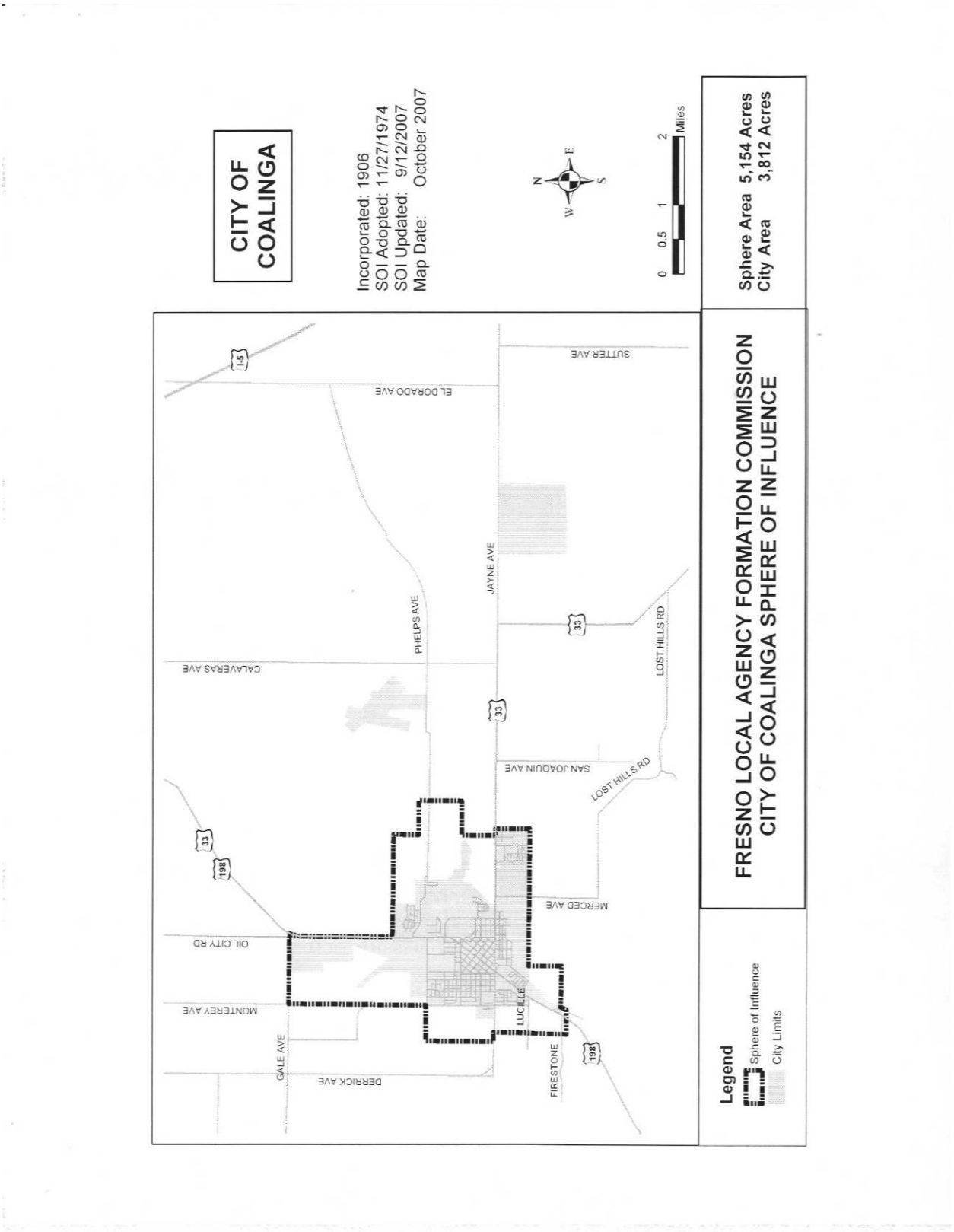
Sincerely,

DARREL SCHMIDT, DEPUTY EXECUTIVE OFFICER
Fresno LAFCo

Enclosures

CC: Lynn Gorman, Fresno County Department of Public Works and Planning Dept.
Bernard Jimenez, Fresno County Development Services Division

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CITY OF COALINGA
Incorporated: 1906
SOI Adopted: 11/27/1974
SOI Updated: 9/12/2007
Map Date: October 2007
N
W
E
S
0 0.5 1 2 Miles
Sphere Area 5,154 Acres
City Area 3,812 Acres
FRESNO LOCAL AGENCY FORMATION COMMISSION
CITY OF COALINGA SPHERE OF INFLUENCE
Legend
Sphere of Influence
City Limits
SUTTER AVE
EL DORADO AVE
JAYNE AVE
PHELPS AVE
CALAVERAS AVE
LOST HILLS RD
SAN JOAQUIN AVE
MERCED AVE
OIL CITY RD
MONTEREY AVE
GALE AVE
DERRICK AVE
LUCILLE
FIRESTONE
33
198
145

8. Fresno Local Agency Formation Commission

8.1 Thank you for your comments. The City concurs that prior letters with EIR comments have been received. This letter dated December 11, 2008, had two letters dated September 17, 2007 and September 10, 2007 respectively attached. Please refer to the September 17, 2007 and the September 10, 2007 comment letters and responses in this section.

8.2 Comment noted. LAFCO does not have the authority to establish AOI. However, the City of Coalinga has added an AOI for the purposes of long-range planning and to note that the City wishes to be informed of any County actions within this area.

8.3 Thank you for finding the boundary error around the airport and the area included in the City is smaller than indicated in the General Plan Update. The City of Coalinga had originally requested the boundary shown in the General Plan Update, but the boundary given on your map is the boundary that was approved by LAFCO, thus reducing the numbers. Please refer to errata sheet item 6 for these revised figures.

8.4 Please refer to the response given in 8.3 above.

8.5 Comment noted that the growth rate given the buildout projections would exceed 8%. Given the development projects currently proposed, this population increase is the reasonably foreseeable growth as defined by the General Plan on page 2-14 of the proposed general plan.

8.6 Comment noted that the projected 8% growth is greater than the 3.2% growth rate estimated by the California Department of Finance. The City's assumptions are based on housing demand and pressure for building permits. The City also anticipates providing housing to serve the mental health facilities and the prison. The EIR Consultant concurs that the potential buildout may be unrealistic given today's economy. It is obvious that the EIR evaluates the worst case scenario. It is likely this buildout will not occur unless the city finds a water source to support increased population. The City is aware of this issue and intends to designate a phasing plan for future development based on land use within the City's Sphere of Influence. Please refer to the Figure V.H.-2 included in the Errata sheet, item 29. However, the City is in the process of updating its Housing Element, and one issue being addressed in this update is refinement of the jobs to housing balance in the City. The EIR consultant recommends that the following phasing plan be further refined as part of the Housing Element update, and that the City consider amending the Land Use Element of the general plan, if necessary, to include the Housing Element update information when that document is completed (estimated date of completion of the Housing Element update is June 2010).

The City is contemplating a five year phasing plan on areas within the Sphere of Influence for residential, commercial and industrial development, as follows:

Residential: Based on Figure V.H.-2 contained in the errata section of this Final Master EIR, the City has identified five areas of future residential areas: one area is

recommended for development by the year 2015, and the other four areas are recommended for consideration by the year 2020. The development potential of these residential areas would be further discussed in the City's Housing Element update.

Commercial: Based on Figure V.H.-2 contained in the errata section of this Final Master EIR, the City has identified three areas for commercial development, and all of these areas are infill areas within the existing Sphere of Influence. The City is pursuing development of commercial properties since the City does not have enough commercial services to meet current population needs.

Industrial: Based on Figure V.H.-2 contained in the errata section of this Final Master EIR, the City has identified two major areas for industrial development. Granite Construction has already indicated a need to expand the existing gravel operation and this is expected to occur before 2015. The second area, located south of Jayne Avenue is expected to occur by 2020.

8.7 The EIR consultant concurs that the City is requesting s a SOI that is roughly two times the size needed to accommodate the projected 2025 population. Comment noted that LAFCO may not be able to find that the proposed SOI is consistent with policy section 330-8. Please refer to comment 8.6 above. It is the intent of the City to first locate development within the city limits (infill) before considering development within the SOI.

8.8 Comment noted that a substantial portion of the area to be included within the City's proposed SOI is considered either "Prime Agricultural Land" or "Farmland of Local Importance." Since the City is surrounded by lands under Williamson Act contracts the City would have to take prime agricultural land in order to grow.

8.9 Please refer to response 19.3 of this section responding to the County of Fresno Department of Public Works comment letter dated September 5, 2007.

8.10 Comment noted. The Valley Blueprint is recommending an average residential density of eight units per acre in Fresno County, which may not be appropriate for Coalinga..

8.11 CEQA requires that the proposed GPU be evaluated based upon existing conditions at the time of notice of preparation. The EIR does not evaluate the GPU in terms of the proposed Valley Blueprint, since it was not available at the time of EIR preparation.

8.12 Comment noted with regard to Fresno COG Model Farmland Conservation Program. Please refer to responses to the County of Fresno Department of Public Works and Planning letter dated January 2, 2009 in 6.0 of this section.

8.13 Comment noted with regard to Williamson Act contract cancellation. Termination of contracts must be approved by the County Board of Supervisors.

8.14 Please refer to response 8.13 above.

8.15 Please refer to responses 8.5 and 8.6 above.

8.16 Please refer to sheet included in the Final Master EIR. Item 19 of the errata sheet addresses these population figures and the amended future water demand. Please note the maximum land use buildout potential would support a population of 81,240, which is referenced in terms of water demand; however, it is not reasonable to anticipate the city of Coalinga will grow at a rate to reach maximum land use buildout. Therefore, the EIR analyzes demand based on the reasonably foreseeable or "buildout population objective" of 55,373.

8.17 Comment noted with regard to Farmland of Statewide Importance, the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000, and the definition of prime farmland. Please refer to 8.8 above.

8.18 The City of Coalinga is concerned about protecting agricultural land and is amenable to a 1:1 rate of replacement. It would help the City to be able to refer to LAFCO agricultural policies when they are completed.

8.19 Comment noted with regard to availability of water and population the water would support. The EIR identified a significant unavoidable impact for the provision of water for growth. The EIR preparer can not identify any sources of water and recommends a significantly reduced GPU. Since it is unlikely that the Bureau of Reclamation can furnish the City with 10,000 acre feet of water annually, it is unlikely that the City can grow. However, the General Plan includes policies to encourage conservation, and the City understands that growth will only occur if there is sufficient water to provide for the growth. Hence, the City has policies in the GPU to first infill within the City limits prior to utilizing lands within the SOI.

8.20 Comment noted that LAFCO will review City proposals consistent with availability of water and that and updated Master Services Plan must be prepared by the City before it can revise its SOI boundary.

8.21 Comment noted, and we concur that it is misleading. This statement has been removed from the MEIR.

8.22 Comment noted with regard to inconsistencies in numbers on Page III-2. Paragraph 2 on Page III-12, beginning on line 7,has been corrected as follows:

…LAFCO. The proposed General Plan includes the proposed expansion of the city's current SOI, as indicated in Table III-3 and Figure III-5. The current SOI is 2,228 acres, or 6,100 acres if acreage within the city limits is included. The proposed SOI for 2025 is 8,620 acres; 12,432 acres if the city limits are included.

Table III-3 on page III-12 has been changed as follows (refer to errata item 27):

TABLE III-3
Planning Boundaries in Acres (approximate)

Planning Area	Current	Proposed
City Limits	*3,812*	*3,812*
Sphere of Influence	2,288	*8,620*
Total Planning Area	*6,100*	12,432
Area of Interest	11,581	41,146
TOTAL	*17,681*	53,579

Source: City of Coalinga General Plan Update 2025

Fresno County Farm Bureau

RECEIVED
DEC 16 2008
FRESNO COUNTY
DEPT. OF
PUBLIC WORKS & PLANNING

December 15, 2008

Ms. Briza Sholars
Fresno County, Department of Development Services Division
2220 Tulare Street, Sixth Floor
Fresno, CA 93721

RE: Request for Review and Comments – City of Coalinga; Draft Master Environmental Impact Report – General Plan Update 2025

Dear Ms. Sholars:

On behalf of the Fresno County Farm Bureau (FCFB), I would like to take the opportunity to respond to the revised "City of Coalinga; Draft Master Environmental Impact Report – General Plan Update 2025." FCFB has a few concerns and comments in regards to the Draft Master Environmental Impact Report's (MEIR) proposed expansion from the City's current sphere-of-influence (SOI) boundaries of 2,288 acres to 7,892 acres, an increase of 345 percent. 9.1

The City of Coalinga's proposal for city incorporation is ambitious. While we can respect the desire of the residents and businesses of Coalinga to expand for the purposes of growth, we are concerned with the land area proposed for inclusion within the incorporated city limits and SOI boundaries. 9.2

The most concerning issue for FCFB is the loss of productive and prime agricultural land. Instead of continuing to diminish our agricultural land resources through low-density developments, the County should direct the City toward developing areas that have the infrastructure and resources to grow along with minimizing the agricultural impacts during urbanization. This MEIR would develop over 3,528 acres of prime farmland and 1,007 acres of farmland of statewide significance, taking the area out of agricultural production forever. The expansion area also takes out 4,466 acres of farmland currently under the Williamson Act. It is FCFB's desire that any consumption of land is used efficiently through high-density developments in urban centers, not farmland.

We therefore strongly encourage the City of Coalinga to search out areas for efficie
methods of expansion, which avoid the devastation and encroachment of the



1274 W. Hedges • Fresno, California 93728
559-237-0263 voice • 559-237-3396 fax • www.fcfb.org • info@fcfb.org

JAN-02-2009 13:18 CO FRESNO DEPT PWP 559 262 4893 P.06

TOTAL P.07

remaining prime farmland. Given the County's Blueprint vision, we should be utilizing land with the highest density use threshold.

9.2 (cont'd)

The report also identifies unavoidable, adverse effects on maintaining the physical and economical integrity of agricultural lands regardless of the mitigation measures implemented.

As a secondary issue, FCFB also continues to have concern regarding the City's long-term reliable water supply and its sources. Additionally, if the SOI expansion is granted, Coalinga needs to be able to provide for the health, safety, and welfare of its community without relying on the County of Fresno as a financial custodian.

9.3

FCFB appreciates the opportunity to submit our comments regarding this Draft Master Environmental Impact Report. If you should have any questions and or comments, please do not hesitate to contact me at (559) 237-0263, or via email at ryanj@fcfb.org.

Sincerely,

Ryan Jacobsen
Executive Director

JAN-02-2009 13:18 CO FRESNO DEPT PWP 559 262 4893 P.07

9. County of Fresno Farm Bureau

9.1 Thank you for commenting on the Draft Master EIR and General Plan Update. Comment noted that the FCFB has concerns with regard to the increased expansion in the City's General Plan. The City has indicated that because the city is surrounded by agricultural lands and lands within Williamson Act contract, infill within the City limits is first priority.

9.2 Comment noted with regard to concerns of expansion of the City's limits. The FCFB wishes the County to direct the City in developing areas that have the infrastructure and resources to grow as well as minimizing loss of agricultural land. The FCFB wishes the City to decrease its growth on land currently in agricultural uses. The County does have a blueprint for growth that is under development. This document was not referenced during development of the General Plan Update, since it is a recent document and is not available at the time of this publication.

9.3 Comment noted with regard to concerns about water resources. The Master EIR notes that the provision of water is a significant issue, and that the proposed General Plan Update growth exceeds the current availability of water to meet that growth. Since this is the case, the City has policies only to allow development to occur to the extent that it can provide water, but that the availability of water will change over time, particularly as the city implements water conservation plans, updates its waste water facilities and has available treated water for reuse, and seeks other water resources to meet the needs of the General Plan Update for future growth. The City also indicates that the areas specified in the Sphere of Influence are considered for future use, and has identified a sequence of development where infill areas are targeted first for development, whenever possible.

Subject: Comments on City of Coalinga General Plan Update Draft Dated November 2008

We have reviewed the Public Review Draft of the General Plan Update and have identified a few items that we would like to bring to your attention.

1. Current Development Proposals (Pages 2-13 & 2-14, Table 2-4, and Figure 2-4): Some of the projects listed in Table 2-4 and shown on Figure 2-4 have been modified or are no longer active. For example, Warthan Heights, a project shown as having 1,036 units, has been withdrawn by Wellington Corporation and the Phelps project (also known as Los Gatos Creek in Table 2-4) has been altered substantially.

2. Land Use Designation Population Densities and Development Intensities (Page 2-23 & 2-24): The land use designation descriptions should also contain population densities for residential designations and a measure of building intensity such as FAR's for commercial and industrial designations (Gov't Code §65302).

3. Architectural Design Guidelines (Implementation Measure LU1-1.5, Page 2-39 and Implementation measure LU2-3.1, Page 2-45): These implementation measures establish city architectural and residential design guidelines. We suggest that new development areas be allowed to prepare their own design guidelines that would be reviewed by the City. This would allow for greater variety in the City and a higher level of guideline detail for new projects at no cost to the City.

4. New Development Location (Implementation Measure LU1-1.10, page 2-40): States: "New development proposals shall be located within the existing City limits to the maximum extent feasible to prevent sprawl and premature annexations of SOI lands." This implementation measure should be revised to be consistent with the proposed land plan that shows substantial development outside the existing City limits and Implementation Measure LU1-5.7 that requires annexation requests to be contiguous or otherwise appropriate to avoid premature development.

5. Green Building Guidelines (Implementation Measure LU1-6.1, page 2-44): California is in the forefront of the nation in adopting green codes and standards, and is currently developing a comprehensive statewide sustainability program. Builders will need to adapt to numerous new building requirements because of this. We suggest that the City conserve its financial resources and not add to the complexity of evolving building codes by deferring from creating its own building standards.

6. Agricultural Land Mitigation (Implementation Measure LU7-2.1, page 2-50 to 2-52): It will be very difficult and cost prohibitive for a developer to acquire conservation easements at a 1:1 ratio for each acre developed. This would add significantly to the upfront costs of initiating a project that could in turn make the project economically infeasible when added to the other fees and infrastructure improvements costs required by the City. A more cost effective approach rather than purchasing large swathes of agricultural easements on land that may never be developed in any case, would be to focus attention on properties that would form a permanent urban/rural boundary for the City. A much lower ratio may then be sufficient for mitigation.

   The timing of payment of in lieu fees would be more feasible if it were at building permit stage when it could be paid incrementally as development proceeds.

DRAFT

Page 2

7. Development within 100 Year Floodplain (Implementation Measure S2-3.2, Page 5-34 and Implementation measure S3-1.4, Page 5-36): The first implementation measure allows development within the FEMA identified 100 year flood plain only if the flood maps are revised by FEMA due to flood control improvements or base elevations are raised to protect new development from flooding. The second implementation measure "Require new development to avoid building in the 100 year floodplain to the extent feasible. Locating structures/facilities in the 100 year floodplain shall be discouraged." raises an inconsistency between the two measures, as development is allowed in the 100 year flood plain under certain specified conditions in the first measure while it is discouraged across the board in the second measure.

8. Regional and Commuter Bikeways (Implementation Measure AQ2-2.5, Page 5-39): Developers should only have to pay their fare share of regional and commuter bikeways that serve areas outside the project boundary.

9. Short Term Construction Mitigation Measures (Implementation Measure AQ4-1.1, Page 5-40 and Table 5-8, Page 5-41):

    a. It is not clear whether a project is required to implement some or all of the mitigation measures listed in Table 5-8. The San Joaquin Valley Air Pollution Control District (SJVAPCD) has the main jurisdiction in regulating the air quality impacts of construction projects and its permit will address many of these items in any case.

    b. Construction equipment mitigation measures a. and d. appear to conflict, one calls for use of alternative fueled or catalyst diesel construction equipment, the other call for replacement of fossil fueled equipment with electrically driven equivalents. Some construction equipment has electrically driven equivalents; much of the heavy construction equipment does not.

    c. The requirement to install windbreaks as a short term construction mitigation measure needs to be more defined. For large sites, a temporary windward fence will have little effect. What is envisioned here to implement the mitigation measure?

10. Biodiesel Fueled Construction Equipment (Implementation Measure AQ5-1.5, Page 5-44): This measure calls for all projects disturbing more than 5 acres to use fuels for construction equipment that reduces GHG emissions by 10%. This is a different approach of regulating emissions of construction equipment from the measures addressed in 9.a. above. The various measures should be consolidated into one measure or a reference should be made to implementing the air quality and GHG emission requirements of the SJVACDP and other state and federal laws in force at the time.

11. Solar Water Heating and Photovoltaic Systems (Implementation Measure AQ5-2.5, Page 5-45): The requirement that all new single family residences with more than 2 baths have solar water heating and/or photovoltaic systems seems rather arbitrary and could result in unforeseen consequences of homes being built with only 2 bedrooms just to avoid this requirement. It may be more appropriate to use another measure such as unit square feet or just require all new homes to provide a solar water heating or photovoltaic system.

12. Soundwalls (Implementation Measure N1-1.5, Page 5-46 and Implementation Measure N1-3.1, Page 5-47): These two implementation measures appear to be inconsistent with each other. The first requires the construction of barriers to shield sensitive uses from noise; the second discourages the use of soundwall barriers to buffer noise. We suggest that soundwalls be allowed along arterial streets subject to appropriate landscaping, setbacks and screening so that the walls are not an adverse visual impact.

DRAFT

Page 3

13. School Facilities (Policy PFS5-1 and Implementation Measures PFS5-1.1, PFS5-1.5 and PFS5-1.8, Page 6-17): Under SB50, the State sets appropriate in lieu fee mitigation levels for the provision of schools and sets forth procedures for school districts to pursue additional levels of funding. The above policy and implementation measures set general requirements for land dedications and development phasing that is outside the purview of local land use regulation. It is the school district responsibility to provide adequate school facilities.

14. Adequate Infrastructure and Services (Policy PFS8-2, Page 6-20): The policy requires that new development only be allowed when accompanied by adequate and efficient infrastructure and services and only when the effectiveness of existing infrastructure and services is not reduced. This policy appears to set a standard that arguably cannot be met when new development is added to a system such that it uses more of the capacity of the infrastructure or service. For example, an existing road may be at LOS B or 55% of design capacity, new development will add traffic that may reduce the level of service to LOS C or 65% design capacity (which is still considered adequate), but may result in slightly longer waits at signals. We suggest that the policy be revised to state that adequate infrastructure and service be provided. The City can then set a measurable, objective standard of adequacy.

15. Payment for Use of Existing Infrastructure and Services (Implementation Measure PFS8-2.5-1.1, Page 6-21): This implementation measure implies that development will be assessed a fair share cost of using existing facilities on a case-by-case basis. It might be more equitable for the City to perform a nexus study and determine what uniform facility use fees will be charged to all new development so that this fee is transparent and predictable.

Thank you for the opportunity to comment on this document.

Sincerely,

Michael Hitchcock
Director of Community Development

cc: Glenn Pace

DRAFT

10. Wellington Corporation

10.1 Thank you for commenting on the Draft Master EIR. We realize that given the recent economic situation many of the proposed developments listed in table 2-4 will be changed or withdrawn and potentially resubmitted at a later date. We understand that Table 2-4 is a rough list of development; however, this is the list used at the time of NOP. The city hopes you will be able to resubmit your projects at a later date to help the city reach its state housing goals.

10.2 Comment noted with regard to population densities. The General Plan Update used an average population density per dwelling unit and does not specify population densities for residential designations. Building intensities for commercial and industrial designations also were not indicated. It is likely that these intensities will be determined as part of the Zoning Ordinance.

10.3 Comment noted. LU1-1.5 does not preclude developer from coming up with their own guidelines. These are minimum standards. Guidelines will be revised as a subsequent project, refer to page III-17 table III-6 of the Draft EIR. Guidelines would be available for review after prepared. It should be noted that guidelines will have to include measures consistent with AB32 in order to reduce greenhouse gas emission.

10.4 Comment noted with regard to consistency between Land Use measures. The intent of the General Plan is to encourage development with the city limits prior to SOI or AOI development. Please refer to the LAFCO letter dated December 11, 2008.

10.5 The City is required to adopt Green Building Guidelines (implementation measure LU1.61) to comply with AB32.

10.6 Comment noted with regard to meeting conservation easement requirement. It is likely that the City will establish an in lieu fee program. Agriculture guidelines are to be reviewed as a subsequent project. Please not table 3-6 on page III-19 will be amended such to strike HCP and insert Ag guidelines. It should be noted that the County of Fresno is also considering the issue of conservation of agricultural land as well as part of the Farmland Ordinance guidelines and Blueprint for Planning.

10.7 Comment noted regarding inconsistency in policies. The City's intent is to avoid development in the flood plains, but development must comply with FEMA regulations. It makes good sense to plan development outside of floodplains for a variety of reasons, including safety issues and cost issues.

10.8 Comment noted with regard to Bikeways. We concur; the state requires developers only pay for bikeways within their project boundaries. Note that the City will be revising their fee structure as part of subsequent work effort under the Master EIR.

10.9 APCD generally only requires those measures that apply to the specific project. We concur that the SJVAPCD is the main jurisdiction for regulating air quality.

10.10 Conflict noted with regard to mitigation measure conflict. Use equipment measure that is applicable to project.

10.11 Comment noted. Use only applicable measures. For large sites there will be measures specific to the project from the SJVAPCD and the County of Fresno.

10.12 Comment noted. We concur; implementation measure AQ5-1.5 shall be amended to read "All projects disturbing more than 5 acres must utilize measures to reduce greenhouse gas emissions consistent with AB32 and other state and federal laws currently in force."

10.13 Comment noted with regard to solar water heating and PHV requirements. If square footage is used, it would also affect the building size. This measure is likely to be revised once the guidelines to reduce global warming are developed by the state agencies. It is likely that all structures will be required to use solar technology in construction in order to reduce greenhouse gas emissions, reduce water consumption, and energy generation. For Coalinga, this measure seemed appropriate to guide the City through 2011, until further guidance comes from CARB and other agencies.

10.14 Measure N1-1.5 is revised to require construction of barriers to shield excessive noise from noise sensitive uses. This refers to air conditioning and other equipment, not sound wall to shield residence from traffic noise.

10.15 Comment noted with regard to school district policy to provide additional facilities under SB50. To our knowledge there is nothing that prohibits a city from setting aside lands for schools. The City can not make the school district purchase the property, however.

10.16 Comment noted regarding language of this policy. This is directed toward water and sewer, not roads. The City would like to offer water and sewer; however the city does not have water to offer, although water has been requested from the State water project. The city can't nor will they allow development to occur when they cannot provide services.

10.17 We concur with this comment. Please refer to page 3-19 of the MEIR. The Capitol Outlay Column of this table outlines subsequent projects. Service fees will be included in various plans.

B. AUGUST 31, 2007 ORIGINAL DRAFT MEIR COMMENT LETTERS AND RESPONSES

Federal, State, and Local Agencies		Page
State of California Governor's Office of Planning and Research State Clearinghouse and Planning Unit Letter of September 10, 2007	1400 10th Street Sacramento, CA 95812 Contact: Terry Roberts	X-54
State of California Department of Conservation Division of Land Resources Protection Letter of September 6, 2007	801 K Street, MS 18-01 Sacramento, CA 95814 Contact: Dennis O'Bryant	X-57
State of California Department of Conservation Division of Oil, Gas and Geothermal Resources Letter of September 5, 2007	466 North 5th Street Coalinga, CA 93210 Contact: Timothy Boardman	X-62
State of California Department of Fish and Game Central Region Letter of September 7, 2007	1234 East Shaw Avenue Fresno, CA 93710 Contact: William Loudermilk	X-64
State of California Department of Transportation District 6 Letter of August 28, 2007	1352 West Olive Avenue P.O. Box 12616 Fresno, CA 93778 Contact: Michael Navarro	X-72
State of California Department of Transportation Division of Aeronautics – M.S.#40 Letter of September 4, 2007	1120 N Street P.O. Box 942873 Sacramento, CA 94273 Contact: Sandy Hesnard	X-76
State of California Department of Water Resources San Joaquin District Letter of August 31, 2007	3374 East Shields Avenue Fresno, CA 93726 Contact: Paula Landis	X-82
State of California Native American Heritage Commission Letter of August 13, 2007	915 Capitol Mall, Room 364 Sacramento, CA 95814 Contact: Dave Singleton	X-85
County of Fresno Department of Community Health Environmental Health Division Letter of September 7, 2007	1221 Fulton Mall P.O. Box 11867 Fresno, CA 93775 Contact: Glenn Allen, R.E.H.S.	X-88
County of Fresno Department of Public Works and Planning Development Services Division Letter of September 5, 2007	2220 Tulare Street, Sixth Floor Fresno, CA 93721 Contact: Briza Sholars	X-90

Federal, State, and Local Agencies		Page
Fresno Local Agency Formation Commission Letter of September 10, 2007	2115 Kern Street, Suite 310 Fresno, CA 93721 Contact: Darryl Schmidt	X-94

General Public and Private Organizations		Page
HCM Farms Letter of September 4, 2007	P.O. Box 773 Coalinga, CA 93210 Contact: Melinda Vierhus	X-100
McPharlin Sprinkles & Thomas LLP Letter of September 7, 2007	Ten Almaden Boulevard, Suite 1460 San Jose, CA 95113 Contact: Katharine Hardt-Mason	X-102
Robert Semple Email of September 7, 2007	284 Lincoln Street Coalinga, CA 93210	X-106
Wellington Corporation Memorandum of August 25, 2007	18640 Sutter Boulevard, Suite 100 Morgan Hill, CA 95037 Contact: Glenn Pace	X-108

The letters of comment are given in the above order with the responses following the individual letters. Letters of comment are reproduced in total, and numerical annotation has been added as appropriate to delineate and reference the responses to those comments. The pages of the letters have been re-numbered to conform to the page sequence of this section.

Note that these letters were received on the original draft Master EIR, and the Master EIR has been revised and re-circulated. These letters are included as reference, particularly since many of the responders referenced these previous responses.

SEP 13 2007

STATE OF CALIFORNIA
GOVERNOR'S OFFICE *of* PLANNING AND RESEARCH
STATE CLEARINGHOUSE AND PLANNING UNIT

ARNOLD SCHWARZENEGGER
GOVERNOR

CYNTHIA BRYANT
DIRECTOR

September 10, 2007

Mary B. Reents
City of Coalinga
c/o Morro Group, Inc.
1422 Monterey Street, Suite C200
San Luis Obispo, CA 93401-2944

Subject: City of Coalinga General Plan Update Master EIR
SCH#: 2002061026

Dear Mary B. Reents:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on September 7, 2007, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

> "A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. **11.1**

Sincerely,

Terry Roberts

Terry Roberts
Director, State Clearinghouse

Enclosures
cc: Resources Agency

1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044
(916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

Document Details Report
State Clearinghouse Data Base

SCH# 2002061026
Project Title City of Coalinga General Plan Update Master EIR
Lead Agency Coalinga, City of

Type EIR Draft EIR
Description The City of Coalinga is updating its General Plan so that it better reflects City goals and anticipated growth over the next 18 years. The City's proposed SOI and AOI are increasing in size to accommodate that growth.

Lead Agency Contact

Name Mary B. Reents
Agency City of Coalinga
Phone (805) 543-7095 ext. 103 **Fax**
email
Address c/o Morro Group, Inc.
1422 Monterey Street, Suite C200
City San Luis Obispo **State** CA **Zip** 93401-2944

Project Location

County Fresno
City Coalinga
Region
Cross Streets Entire Community
Parcel No. Various
Township 21S **Range** 16E **Section** **Base** Coalinga

Proximity to:

Highways 133
Airports Coalinga Municipal
Railways
Waterways
Schools West Hills Community College
Land Use Various

Project Issues Aesthetic/Visual; Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Cumulative Effects; Drainage/Absorption; Economics/Jobs; Flood Plain/Flooding; Forest Land/Fire Hazard; Geologic/Seismic; Growth Inducing; Landuse; Minerals; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Septic System; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Wildlife

Reviewing Agencies Caltrans, Division of Aeronautics; Caltrans, District 6; California Highway Patrol; Department of Conservation; Department of Fish and Game, Region 4; Office of Historic Preservation; Integrated Waste Management Board; Native American Heritage Commission; Office of Emergency Services; Department of Parks and Recreation; Regional Water Quality Control Bd., Region 5 (Fresno); Resources Agency; State Water Resources Control Board, Division of Water Rights; Department of Toxic Substances Control

Date Received 07/20/2007 **Start of Review** 07/20/2007 **End of Review** 09/07/2007

Note: Blanks in data fields result from insufficient information provided by lead agency.

1. State of California Governor's Office of Planning and Research, State Clearinghouse and Planning Unit

11.1 This letter acknowledges receipt of EIR. No response necessary.

STATE OF CALIFORNIA, RESOURCES AGENCY ARNOLD SCHWARZENEGGER, GOVERNOR

DEPARTMENT OF CONSERVATION

DIVISION OF LAND RESOURCE PROTECTION

801 K STREET • MS 18-01 • SACRAMENTO, CALIFORNIA 95814

PHONE 916 / 324-0850 • FAX 916 / 327-3430 • TDD 916 / 324-2555 • WEBSITE conservation.ca.gov

September 6, 2007

VIA FACSIMILE (805) 543-2367
Mr. Bill Skinner, Director
Community Development Department
City of Coalinga
c/o Mary B. Reents
Morro Group, Inc.
1422 Monterey Street, Suite C200
San Luis Obispo, CA 93401-2944

Subject: Draft Environmental Impact Report for the City of Coalinga General Plan Update (Fresno County) **SCH# 2002061026**

Dear Mr. Skinner:

The Department of Conservation's (Department) Division of Land Resource Protection (Division) has reviewed the Draft Environmental Impact Report (DEIR) for the referenced project. The Division monitors farmland conversion on a statewide basis and administers the California Land Conservation (Williamson) Act and other agricultural land conservation programs. We offer the following comments and recommendations with respect to the project's impacts on agricultural land and resources. 12.1

Project Description

The purpose of the City of Coalinga (City) General Plan Update project is to update the City's General Plan, expand the City's existing Sphere of Influence (SOI) and the Area of Interest (AOI), and consideration of a several residential and commercial proposals. The proposed SOI contains approximately 6,200 acres currently zoned Agriculture. Approximately 3,528 acres of lands outside of the current city limits and within the proposed SOI are designated as Prime Farmland; 1,007 acres are designated as Farmland of Statewide Importance. The DEIR notes that implementation of the proposed General Plan would convert the 3,528 acres of Prime Farmland and 1,007 acres of Farmland of Statewide Importance to non-agricultural uses. Additionally, implementation of the project would result in the loss of 4,466 acres of Williamson Act contracted lands. Implementation of the project would result in a significant and unavoidable impact to agricultural resources. Therefore, the Division recommends that the Final EIR (FEIR) address the following items to provide a comprehensive discussion of potential impacts of the project on agricultural land and activities.

Mitigation Measures

The loss of agricultural land represents a permanent reduction in the State's agricultural land resources. The project notes several mitigation measures planned to promote planned growth, discourage "leap-frog" development, and ensure that impacts to agricultural resources do not occur prematurely. The Department echoes the City's use of agricultural conservation easements on land of at least equal quality and size as partial compensation for the direct loss of agricultural land. However, since Williamson Act contracts will eventually be terminated, and growth inducing and cumulative agricultural impacts are involved, the Department recommends that this ratio of conservation easements to lost agricultural land be increased. Conservation easements will protect a portion of those remaining land resources and lessen project impacts in accordance with CEQA Guideline §15370. The Department highlights this measure because of its acceptance and use by lead agencies as an appropriate mitigation measure under CEQA and because it follows an established rationale similar to that of wildlife habitat mitigation. 12.2

Mitigation via agricultural conservation easements can be implemented by at least two alternative approaches: the outright purchase of easements or the donation of mitigation fees to a local, regional or statewide organization or agency whose purpose includes the acquisition and stewardship of agricultural conservation easements. The conversion of agricultural land should be deemed an impact of at least regional significance. Hence the search for replacement lands should be conducted regionally or statewide, and not limited strictly to lands within the project's surrounding area. 12.3

Other forms of mitigation may be appropriate for this project, including:

- Protecting farmland in the project area or elsewhere in the County through the use of less than permanent long-term restrictions on use such as 20-year Farmland Security Zone contracts (Government Code Section 51296 et seq.) or 10-year Williamson Act contracts (Government Code Section 51200 et seq.).
- Directing a mitigation fee to invest in supporting the commercial viability of the remaining agricultural land in the project area, County or region through a mitigation bank that invests in agricultural infrastructure, water supplies, marketing, etc.

The Department also has available a listing of approximately 30 "conservation tools" that have been used to conserve or mitigate project impacts on agricultural land. This compilation report may be requested from the Division at the address or phone number below. General information about agricultural conservation easements, the Williamson Act, and provisions noted above is available on the Department's website, or by contacting the Division at the address and phone number listed below. The Division's website address is:

http://www.conservation.ca.gov/dlrp/index.htm

Of course, the use of conservation easements is only one form of mitigation that should be considered. Any other feasible mitigation measures should also be considered.

Williamson Act Lands

Under California Code of Regulations Section 15206(b)(3), a project is deemed to be of statewide, regional or area-wide significance if it will result in cancellation of a Williamson Act contract for a parcel of 100 or more acres. Since lands under Williamson Act contracts and/or in agricultural preserves exist in the project area, the Department recommends that the following information be provided in the Final EIR (FEIR): **12.4**

- A map detailing the location of agricultural preserves and contracted land within each preserve. The FEIR should also tabulate the number of Williamson Act acres, according to land type (e.g., prime or non-prime agricultural land), which could be impacted directly or indirectly by the project.
- A discussion of Williamson Act contracts that may be terminated in order to implement the project. The FEIR should discuss the probable impacts on nearby properties resulting from the termination of adjacent Williamson Act contracts. For example, a termination of a Williamson Act contract may have a growth-inducing impact. In other words, a termination may not only lift a barrier to development, but also result in higher property taxes, and thus, an incentive to shift to a more intensive land use, such as urban development. **12.5**
- As a general rule, land can only be withdrawn from a Williamson Act contract through the nine-year non-renewal process. Immediate termination via cancellation is reserved for "extraordinary circumstances" (See Sierra Club v. City of Hayward (1981) 28 Cal.3d 840, 852-855). Under Government Code section 51282, the city or county must approve a request for cancellation and base that approval on specific findings that are supported by substantial evidence. When cancellation is proposed, the Department recommends that a discussion of the findings be included in the FEIR. Finally, a notice of the hearing to approve the tentative cancellation and a copy of the landowner's petition must be mailed to the Director of the Department ten working days prior to the hearing. (The notice should be mailed to Bridgett Luther, Director, Department of Conservation, c/o Division of Land Resource Protection, 801 K Street MS 18-01, Sacramento, CA 95814-3528.) **12.6**
- Under Government Code Section 51243, if a city annexes land under a Williamson Act contract, the city must succeed to all rights, duties, and powers of the county under the contract. However, under Section 51243.5, a city may exercise its option not to succeed to the contract if certain conditions are met. LAFCO must notify the Department within 10 days of a city's proposal to annex land under a contract (Government Code Section 56753.5). Additionally, LAFCO must not approve a change to a sphere of influence or annexation of contracted land to a city unless certain conditions are met (see Government Code Sections 51296.3, 56426, 56426.5, 56749 and 56856.5). **12.7**
- If portions of the planning area are under Williamson Act contracts (and will continue to be under contract after project implementation) the FEIR should discuss the proposed uses for those lands. Uses of contracted land must meet compatibility standards identified in Government Code Sections 51238 - 51238.3. Otherwise, contract termination (see paragraph above) must occur prior to the initiation of the land use. **12.8**

- An agricultural preserve is a zone authorized by the Williamson Act and established by the local government to designate qualified land to be placed under the Williamson Act's 10-year contracts. Preserves are also intended to create a setting for contract-protected lands that is conducive to continuing agricultural use. Under Government Code Section 51230, "An agricultural preserve may contain land other than agricultural land, but the use of any land within the preserve and not under contract shall within two years of the effective date of any contract on land within the preserve be restricted by zoning, including appropriate minimum parcel sizes that are at a minimum consistent with this chapter, in such a way as not to be incompatible with the agricultural use of the land." Therefore, the FEIR should also discuss any proposed general plan designation or zoning within agricultural preserves affected by the project.

12.9

Thank you for giving us the opportunity to comment on this DEIR. If you have questions regarding our comments, or require technical assistance or information on agricultural land conservation, please contact Elliott Lum, Environmental Planner, at 801 K Street, MS 18-01, Sacramento, California 95814; or, phone (916) 324-0869.

Sincerely,

Dennis J. O'Bryant
Program Manager

cc: State Clearinghouse

Westside Resource Conservation District
PO Box 205
Five Points, CA 93624

SEP 10 2007

2. State of California Department of Conservation, Division of Land Resources Protection

12.1 Thank you for commenting on the Draft Master EIR (MEIR). Comment noted that the Department of Conservation monitors farm conservation easements on a statewide basis. It is also noted that the Division recommends discussion in the Final EIR of potential impacts of the project on agricultural land and activities. Please refer to revised Draft MEIR and response to the County of Fresno Farm Bureau letter in the first part of this section.

12.2 Regarding increase in compensatory agricultural land, neither the county nor state has guidelines for ratio of conservation easements to lost agricultural land. Please refer to LAFCO letter dated December 11, 2008, page 6, item 4, which notes that LAFCO is in the process of developing agriculture preservation policies that may require similar use of conservation easements at a 1:1 rate or payment of in lieu fees. This would apply to the entire county including the City of Coalinga. In addition, the Draft General Plan includes a 1:1 replacement rate for agricultural lands, refer to Policy LU7-2 and Implementation Measure in LU7-2.1 in the November 2008 Draft Master EIR.

12.3 Please refer to page V-50 of November 2008 MEIR. Also refer to page III-18 of MEIR which shows a subsequent project that includes development of a right to farm ordinance, with capital outlay proposed within one year of plan. This ordinance will also look at other measures proposed to protect adjacent farmland.

12.4 Please refer to Figure V.E-2 page V-47 of the November 2008 Draft MEIR.

12.5 Please refer to page VII-3 of the November 2008 Draft MEIR.

12.6 Comment noted regarding process to withdraw property from Williamson Act. The City understands the process of non renewal is a 9 year process. It should be noted that all lands surrounding the City are under Williamson Act contract.

12.7 Comments noted with regard to LAFCO notification process. The City understands that LAFCO must not approve a change to a sphere of influence or annexation of contracted land to a city unless certain conditions are met.

12.8 Please refer to Figure III-4 which indicates proposed land uses under the General Plan. The City recognizes that contract termination must occur on Williamson Act lands prior to the initiation of the land use.

12.9 To the City's knowledge, none of the land surrounding the city under the General Plan is in agricultural preserve. If there are any lands designated agricultural preserve, the City will not approve any action on those lands until they consult with the Department of Conservation.

STATE OF CALIFORNIA, RESOURCES AGENCY ARNOLD SCHWARZENEGGER, GOVERNOR

OIL, GAS & GEOTHERMAL

DEPARTMENT OF CONSERVATION

DIVISION OF OIL, GAS AND GEOTHERMAL RESOURCES

SEP - 6 2007

466 North 5th Street • Coalinga, California, 93210
PHONE 559 / 935-2941 • FAX 559 / 935-5154 • WEBSITE conservation.ca.gov

September 5, 2007

Mr. Bill Skinner
City of Coalinga
C/O Mary B. Reents
Morro Group, Inc.
1422 Monterey Street, Suite C200
San Luis Obispo, CA 93401-2954

RE: Draft Master EIR and Additional Draft EIR, Coalinga General Plan Update

The drilling and production of oil has been and is still an integral part of the City of Coalinga. **13.1**

Along with the current producing oil wells there are some old abandoned dry wells scattered around the area.

I am enclosing three maps that encompass the area mentioned in the General Plan. Future development plans should consider these wells. In the event any of these wells should leak it is important to have surface access for remedial action. The Division of Oil, Gas & Geothermal does not recommend building any structures over any active or abandoned oil well.

Thus abandoned wells should be considered part of the building permit review process. This office has records of these wells and can assist you.

Thank you.

Timothy Boardman
District Deputy
California Division of Oil, Gas, and Geothermal Resources
Coalinga

The Department of Conservation's mission is to protect Californians and their environment by: Protecting lives and property from earthquakes and landslides; Ensuring safe mining and oil and gas drilling; Conserving California's farmland; and Saving energy and resources through recycling.

3. State of California Department of Conservation, Division of Oil, Gas and Geothermal Resources

13.1 Comment noted with regard to drilling and oil production being important to the City. The City understands that there are producing wells and abandoned dry wells within the AOI and SOI. Thank you for the maps enclosed with the letter. These maps are on file with the City Public Works Department. The City understands that well locations, active or abandoned, would be required to be identified during in the building permit review process. Refer to page III-17 of the November 2008 Draft MEIR for a list of subsequent projects, including update of City ordinances. Where appropriate, projects requiring discretionary review will include measures to investigate location of active or abandoned wells as applicable, so they can be properly handled during project review.

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

ARNOLD SCHWARZENEGGER, Governor

September 7, 2007

William Skinner
City of Coalinga
Community Development Department
155 West Duran Avenue
Coalinga, California 93210

Mary B. Reents
Morro Group, Incorporated
1422 Monterey Street, C200
San Luis Obispo, California 93401-2944

Dear Mr. Skinner and Ms. Reents:

City of Coalinga General Plan Update (2005-2025)
Master Environmental Impact Report (MEIR)
SCH No. 2002061026

The Department of Fish and Game (Department) has reviewed the MEIR prepared for the City of Coalinga General Plan Update 2025 (General Plan) as well as the General Plan itself. The MEIR addresses potential environmental impacts associated with General Plan implementation. The proposed General Plan includes expanded Sphere of Influence (2,288 acres to 6,271 acres) and Area of Interest (11,581 acres to 42,766 acres) boundaries. Several principles included in the General Plan, such as the promotion of smart growth and redevelopment, preservation of the open and rural character of the community, and maintenance of the aesthetic values of the areas surrounding the City of Coalinga (City), are generally compatible with many of the biological resource values present within the General Plan area. However, as acknowledged in the MEIR, there will be potentially significant impacts to biological resources associated with future urbanization and associated infrastructure. The General Plan also states that the Coalinga Habitat Conservation Plan (CHCP) that has been underway for several years will not be utilized and, therefore, is not included in the General Plan as a land use policy. This is quite unfortunate, as this means that landscape-level conservation may not occur as previously discussed among the City, United States Fish and Wildlife Service (USFWS), and the Department. In addition, this means that project-by-project permitting would, therefore, be necessary for development projects in the General Plan area in order to comply with the California Endangered Species Act (CESA). Project-by-project permitting can result in a delay of project implementation, and we recommend that the City encourage project applicants in the General Plan area to consult as early as feasible with the Department. We also

Conserving California's Wildlife Since 1870

encourage the City to review the potential Habitat Conservation Plan with us and the USFWS to see if there may yet be value in that plan as a whole, in specific elements, or general strategies. Our comments on the General Plan and MEIR follow.

Department Jurisdiction

Trustee Agency Authority: The Department is a Trustee Agency with responsibility under the California Environmental Quality Act 9CEQA) for commenting on projects that could impact plant and wildlife resources. Pursuant to Fish and Game Code Section 1802, the Department has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. As a Trustee Agency for fish and wildlife resources, the Department is responsible for providing, as available, biological expertise to review and comment on environmental documents and impacts arising from project activities, as those terms are used under CEQA. **14.1**

Responsible Agency Authority: The Department has regulatory authority over projects that could result in the "take" of any species listed by the State as threatened or endangered, pursuant to Fish and Game Code Section 2081. If future projects authorized within the General Plan area could result in the "take" of any State-listed threatened or endangered species, the Department may need to issue a "take" permit for these projects prior to project implementation. **14.2**

State-listed species known to occur in the vicinity of the City include the Federally endangered and State threatened San Joaquin kit fox (*Vulpes macrotis mutica*) and the Federally and State endangered, Fully Protected blunt-nosed leopard lizard (*Gambelia sila*). The State threatened San Joaquin antelope squirrel (*Ammospermophilus nelsoni*), the State threatened Swainson's hawk (*Buteo swainsoni*), and the Federally and State endangered California jewel flower (*Caulanthus californicus*) may also occur in the vicinity of the City. Specific remarks on "take" potential, permitting requirements, and mitigation are included in subsequent portions of this letter. **14.3**

The Department also has regulatory authority with regard to activities occurring in streams and/or lakes that could adversely affect any fish or wildlife resource, pursuant to Fish and Game Code Section 1600 et seq. If projects included within the General Plan propose activities that will involve work within the bed, bank or channel of Warthan, Jacalitos, Los Gatos, or Zapata Chino Creeks, Arroyo Pasajero, or any other streams or drainages, a Stream Alteration Agreement (SAA) may be necessary. Project proponents should submit a Stream Alteration Notification to the Department for their projects. The Department is now required to comply with CEQA in the issuance or the renewal of an SAA. Therefore, for efficiency in environmental **14.4**

compliance, we recommend that the stream disturbance be described, and mitigation for the disturbance be developed as part of the environmental review process. This will reduce the need for the Department to require extensive additional environmental review for an SAA for this Project in the future. For additional information on notification requirements, please contact our staff for the Stream Alteration Program at (559) 243-4593. 14.4 (cont'd)

Bird Protection: The Department also has jurisdiction over actions which may result in the disturbance or destruction of active nest sites or the unauthorized "take" of birds. Sections of the Fish and Game Code 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 non-game bird). 14.5

Fully Protected Species: The Department has jurisdiction over Fully Protected species of birds, mammals, amphibians and reptiles, and fish, pursuant to Fish and Game Code Sections 3511, 4700, 5050, and 5515. "Take" of any Fully Protected species is prohibited in all circumstances, and the Department cannot authorize their "take." As described in the MEIR, Fully Protected species known to occur in the vicinity of the General Plan Area include the blunt-nosed leopard lizard (BNLL), white-tailed kite (*Elanus leucurus*), and golden eagle (*Aquila chrysaetos*). Additional comments on potential impacts to Fully Protected species follow in subsequent portions of this letter. 14.6

Potential Impacts and Recommendations

General Plan Implementation Measures: The Department concurs with measures OSC1-1.1 through OSC1-4.5; implementation would result in enhanced protection of biological resources in the General Plan area and would assist in the Department's review of project-specific proposals in the General Plan area. 14.7

Blunt-Nosed Leopard Lizard (BNLL): This species is known to occur within and adjacent to the General Plan area, including but not limited to the Department's Pleasant Valley Ecological Reserve (PVER). Because the BNLL is Fully Protected and, therefore, no "take" incidental or otherwise can be authorized by the Department, protocol-level surveys must be conducted prior to any project-specific ground-disturbing activities in all areas of suitable habitat. Suitable habitat includes all grassland and shrub scrub habitat that contains required habitat elements, such as small mammal burrows. In areas where all ground-disturbing activities will completely avoid (by a minimum distance of 30 feet) small mammal burrows, protocol-level surveys would not be required. These surveys, the parameters of which were designed to optimize 14.8

detectability, must be conducted to reasonably assure the Department that "take" of this Fully-Protected species will not occur as a result of Project implementation. In the event that this species is detected during protocol-level surveys, consultation with the Department is warranted to discuss how to implement the Project and avoid "take". 14.8 (cont'd)

San Joaquin Kit Fox: *This species is known to occur throughout the General Plan* area, including within the existing urbanized areas of the City. It is important that measure OSC1-3.1 (biological resources evaluation) be conducted on all proposed project sites, even in-fill lots. In certain portions of the remaining kit fox range where there are localized high densities of kit fox and sufficient areas of remaining open space, such as within western Kings, Fresno, and Kern Counties, kit fox are known to forage and den within urbanized areas. There is some indication that urban and suburban populations of kit fox may be significant to the species' long-term survival. In communities such as Bakersfield, Taft, Avenal, and Maricopa, kit foxes commonly utilize almost any open space for denning and foraging, including but not limited to canals, vacant lots, commercial and light industrial developments, railroad, power, and other utility right-of-ways (ROWs), parks, golf courses, schools, and stormwater retention basins/sumps. Residential developments are used to a much lesser extent, likely because of the movement barriers posed by multiple and frequent fencing. The Department knows less about the status of foxes in the City since there have not yet been any focused research efforts in the area, but public reports and occasional kit fox related incidents requiring Department intervention indicate that there is a consistent urban kit fox population within Coalinga. In addition to conducting a Biological Resources Evaluation for proposed projects, immediately prior to project-specific ground-disturbing activities, the Department recommends that the "Standardized recommendations for protection of the San Joaquin kit fox prior to or during ground disturbance"(USFWS, 1999) be followed, prior to any ground-disturbing construction or maintenance activities occurring within the General Plan area. If known, active, or natal kit fox dens are detected during the Biological Resources Evaluation or during pre-activity surveys, the results of these surveys should be submitted to the Department prior to any ground-disturbing activities so that project-related "take" potential can be adequately determined. If "take" cannot be avoided, acquisition of a State Incidental Take Permit would be required prior to project implementation. Maintenance activities of public open space (such as golf courses, rights-of-way, parks) should be periodically reviewed for their potential for "take" or adverse impacts on kit fox. 14.9

CESA Compliance and the Draft Coalinga Habitat Conservation Plan (CHCP): The statement "*However, for various reasons, the draft CHCP will not be utilized and therefore will not be included as an existing policy*" is included repeatedly within the General Plan. The Department was not aware that the City has chosen to discontinue the CHCP effort, and, as noted above, we are concerned that the landscape-level 14.10

conservation effort that would have resulted from CHCP planning and implementation will no longer occur. In addition, there are several projects that the City has approved in the past few years that did not obtain State or Federal Incidental Take Permits, due to the pending and in progress CHCP. It is important that on-the-ground conservation occur for impacts related to these past projects, even if the CHCP effort is no longer being pursued. **14.10 (cont'd)**

The Department is encouraged that the General Plan indicates that the City will continue to acquire land for inclusion in the Coalinga Conservation Bank to mitigate for project-related impacts to biological resources. However, it is important to note that absent a CHCP effort, project-specific Incidental Take (2081) Permits are required **in addition to** mitigation. For projects within and outside the General Plan area that may result in "take" of State-listed species, an Incidental Take Permit would be needed and the applicant would need to: 1) provide an analysis of the impact of the proposed taking; 2) provide an analysis of whether issuance of an Incidental Take Permit would jeopardize the continued existence of the covered species; 3) propose measures that minimize and fully mitigate the impacts of the proposed taking; 4) provide a proposed plan to monitor compliance with the minimization and mitigation measures; and 5) provide a description of the funding source and level of funding available for implementation of the minimization and mitigation measures. Absent the type of legal agreement that accompanies an HCP and Implementing Agreement, payment of fees to the City for projects would not meet the Department's Fully Mitigate standard required for Incidental Take Permit issuance. In general, Incidental Take Permits require implementation of avoidance, minimization, and mitigation measures. In general, mitigation involves the protection in perpetuity (via conservation easements or fee title held by the Department) of in-kind (or better) habitat of an acreage deemed appropriate by the Department relative to the amount of acreage to be impacted. In addition, a per-acre enhancement and endowment fee is also necessary. The enhancement fee is to "improve" the habitat via fencing, debris removal, etc., and the endowment is placed in a non-wasting account which allows the property to be managed via the generated interest. The Department requires that the Department hold the endowment fees. **14.11**

While absent a CHCP, applicants will need individual project-specific Incidental Take Permits; there may be a way to formalize the Coalinga Conservation Bank agreement in such a way that utilization for mitigation would meet State Incidental Take Permit issuance criteria. We would like to work with the City on this effort and to continue to work on conservation efforts in the General Plan area. **14.12**

To discuss the issues raised in this letter or if you have any additional questions, please contact Julie Vance, Senior Environmental Scientist, at the address provided on this letterhead or by telephone at (559) 243-4014, extension 222.

Sincerely,

W. E. Loudermilk
Regional Manager

cc: Brian Peterson
United States Fish and
Wildlife Service
2800 Cottage Way, W-2605
Sacramento, California 95825

Susan Jones
United States Fish and
Wildlife Service
2800 Cottage Way, W-2605
Sacramento, California 95825

State Clearinghouse
Office of Planning and Research
Post Office Box 3044
Sacramento, California 95812-3044

Steve Juarez
Department of Fish and Game

4. State of California Department of Fish and Game, Central Region

14.1 The Draft Master EIR has been revised; please review response to the Department of Fish and Game letter dated December 31, 2008. The City is planning on completing the CHCP as part of the General Plan Update, and has scheduled this work effort as a subsequent project to commence within 6 months of general plan approval. Comment noted regarding the role of the CDFG as a trustee agency.

14.2 Comment noted with regard to CDFG responsibilities.

14.3 Please refer to the response to the CDFG letter of December 31, 2008, with regard to the San Joaquin kit fox.

14.4 Comment noted with regard to CDFG role within riparian and streams within the City's jurisdiction.

14.5 Comment noted with regard to CDFG role in protection of birds under the Migratory Bird Treaty Act.

14.6 Comment noted with regard to CDFG role in the protection of fully protected species. Comment noted with regard to the fully protected Blunt-nosed leopard lizard (BNLL). Please refer to the response to the CDFG letter of December 31, 2008, with regard to the BNLL.

14.7 The City appreciates that the CDFG concurs with the biological policies and mitigation included in the GPU and the EIR. It is the intent of the City to continue in the preparation of the CHCP. Please refer to the response to the CDFG letter of December 31, 2008, with regard to mitigation contained in the EIR.

14.8 Please refer to the response to the CDFG letter of December 31, 2008, with regard to the BNLL.

14.9 Please refer to the response to the CDFG letter of December 31, 2008, with regard to the San Joaquin kit fox.

14.10 The Draft Master EIR has been revised; please review response to the Department of Fish and Game letter dated December 31, 2008. The City is planning on completing the CHCP as part of the General Plan Update, and has scheduled this work effort as a subsequent project to commence within 6 months of general plan approval. Comment noted regarding the role of the CDFG as a trustee agency.

14.11 With regard to compensatory mitigation, the City has implemented a compensatory program and has collected funds from development to purchase compensatory properties. This concept is likely to be continued; however, the City notes that a more formal process is needed and will include guidelines as part of the CHCP being prepared as part of the General Plan update.

14.12 The City understands the need for incidental take permits when a development application would likely affect habitats for listed species, and will continue to require proof of permits prior to construction when applicable. In addition, the City thanks the CDFG for their continued cooperation, and the City is planning on consulting with CDFG throughout the preparation of the CHCP and City planning processes.

STATE OF CALIFORNIA—BUSINESS, TRANSPORTATION AND HOUSING AGENCY ARNOLD SCHWARZENEGGER, Governor

DEPARTMENT OF TRANSPORTATION
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August 28, 2007

2131-IGR/CEQA
6-FRE-GEN
MASTER EIR/G.P. UPDATE
SCH 2002061026

Mr. Bill Skinner
City of Coalinga
C/O Mary B. Reents
Morro Group, Inc.
1422 Monterey Street, Suite C200
San Luis Obispo, CA 93401

Dear Mr. Skinner:

We have completed our review of the City's proposal to update its General Plan to better reflect the City's goals for growth through the year 2025. Caltrans has the following comments:

1. CGPU page 2-46: Clarify how SR 33/SR 198/Bus I-5 will be developed subject to a Downtown Core Area consistent with IM LU5-2.1 (landscaped, and pedestrian-friendly) as well as the mission of moving traffic, goods, and people efficiently. **15.1**

2. CGPU page 4-13: Clarify statement that much of non-residential trips "will be external to Coalinga" and expand on the meaning intended. **15.2**

3. CGPU page 4-18: Policy IM C1-1.1. Require that development prepare a Traffic Impact Study (TIS) for each subsequent project pursuant to this MEIR subject to CEQA in accordance with Caltrans' Guide for the Preparation of Traffic Impact Studies (TIS). Such projects will generate a significant number of trips during peak travel periods, both now and in the future. A Traffic Impact Study (TIS) is required to assess project-related impacts on SR 33, SR 198, and Business I-5, and how the project's fair share contribution toward mitigation of such impacts will be applied. Each TIS will need to address all modes of traffic passing through SR 33/SR 198/Bus I-5 within the Coalinga SOI. **15.3**

4. CGPU page 4-18: Policy IM C1-1.3. Policy should establish development standards requiring Traffic Impact Studies scoped to analyze both current and future operational impacts for all modes of traffic. **15.4**

5. CGPU page 4-18: Policy IM C1-1. Add policy to support annexation of entire road right-of-way widths to simplify the number of agencies involved in the review of proposed improvements and maintenance activities. **15.5**

6. CGPU page 4-18: Policy IM C1-2. Broaden policy to include a system-wide fee component to fund improvements at sub-standard road widths, or 'bottle-necks', left behind by prior development as noted in IM C1-5.3. **15.6**

"Caltrans improves mobility across California"

7. CGPU page 4-19: Policy IM C1-2.3. Although Caltrans will be involved in monitoring the need for traffic impact mitigation for development, Caltrans funding should not be expected as noted and such mitigation must be borne by development alone. Traffic Impact Fees for traffic signals imposed to mitigate congestion caused by development, for example, should program the full capture of construction costs and not rely on public agency funding assistance, especially when current Levels of Service for existing facilities presently meet standards as shown in Table TC-1 of the Draft MEIR. **15.7**

8. CGPU page 4-22: Policy IM C3-1.2 should include Collectors as well as Arterials to be internally consistent with other cites in he CGPU. Compare page 5-39 IM AQ2-2.3. **15.8**

9. CGPU page 4-22: Policy IM C3. Include a policy that preventive measures such as continuous root barriers shall be installed where shade trees may be planted to prevent sidewalk damage in 20-30 years when trees become mature. **15.9**

10. MEIR page II-8: Update Table Class II Impacts to reflect changes to Impact Mitigation as noted above. **15.10**

11. MEIR page III-17, Table III-5: Project "Two new bridges" should not contemplate Caltrans funds as such widening mitigation derives from development impacts. Also, other bridges should be factored in the economic elements of any developer fee-based mechanism adopted. Examples of bridges impacted by Coalinga ADT growth that will likely require wider structures include Fresno County's Eldorado Avenue bridge over Los Gatos Creek and Lost Hills Road bridge over Jacalitos Creek. **15.11**

12. MEIR pageV-95, Table PS-2: Clarify disparity which shows 12 more school campuses will be needed by 2025 while Page V-97, PS Impact 3 indicates there will be a demand for an additional 13 elementary schools, 4 middle schools, and 3 high schools, for a total of 20 additional campuses. **15.12**

13. MEIR pageV-122, TC Impact 1: Expand discussion to include all modes of traffic as noted above. A list of the 29 traffic signals needed by 2025 should be listed in a related table. **15.13**

Please be advised that any future development adjacent to a State Route, whether the entitlement is deemed by the lead agency to be discretionary or ministerial should be sent to Caltrans for review. Also, please send a response to our comments prior to staff's recommendations to the Planning Commission and the City Council. If you have any questions, please call me at (559) 445-5868. **15.14**

Sincerely,

MICHAEL NAVARRO
Office of Transportation Planning
District 06

C: State Clearinghouse

"Caltrans improves mobility across California"

5. State of California Department of Transportation, District 6

15.1 Thank you for your letter. Since the time the letter was written, City staff and consultant have met with Caltrans numerous times to discuss SR 33/SR 198/Bus I-5. The City will review with Caltrans the project's landscape and pedestrian access.

15.2 Comment noted regarding non residential trips being external to Coalinga as stated in the GPU. It is our understanding that the city's traffic consultant considered trips that came from outside the area (external) were the result of employment at such businesses as the mental health hospital, the prison, large agricultural companies, Granite Construction and the oil companies whereby employees were living in other communities and commuting to work. Coalinga can reduce this commuter traffic by providing a better jobs to housing balance; this issue is being addressed in the Housing Element update that is listed as a subsequent project under the Master EIR process.

15.3 Refer to IM C1-1.3. A Traffic Impact Study (TIS) will be required pursuant to this request.

15.4 Although not specifically stated, the TIS would be required to follow Caltran's guidelines.

15.5 The five year capitol improvement plan is listed as a subsequent project; the city will review the Caltrans request to annex the entire road right of way widths as part of the improvement planning process, and funding mechanisms to correct road deficiencies.

15.6 Please refer to response to 15.5

15.7 Comment noted with regard to the lack of Caltrans funding. TIF program shall incur money to offset cost of development. City shall update TIF for consistency with General Plan Update.

15.8 Implementation Measure C3-1.2 will be amended to read as follows:

"*Install dedicated sidewalks along major arterials and collectors, and plant and maintain trees to reinforce a pedestrian-friendly atmosphere."*

This change is shown on the errata sheet as item 28.

This measure may be revised to omit trees due to severe drought conditions in Coalinga and elsewhere in California, consistent with the city's recently approved Water Conservation Ordinance.

15.9 Policy IM C-3 Comment noted. The City concurs with preventative measure. This will be addressed in the subsequent Landscape Plan. Please note that due to a lack of water resources in the City that it is unlikely that tree planting requirements will be included in the Landscape Plan.

15.10 Comment noted. Changes to impact mitigation table have been made in the revised Draft MEIR to reflect Caltrans recommended changes.

15.11 Comment noted. All bridge improvement will be included in TIF program. TIF fee program will be evaluated by the city subsequent to the General Plan Update.

15.12 Comment noted. Discrepancy in numbers have been fixed in MEIR Errata Sheet items 13 and 16.

15.13 Comment noted. Discussion now includes all modes of traffic. Requested table has been included in the EIR.

15.14 Comment noted regarding sending responses to the Planning Commission and City Council.

STATE OF CALIFORNIA—BUSINESS, TRANSPORTATION AND HOUSING AGENCY ARNOLD SCHWARZENEGGER, Governor

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Flex your power!
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September 4, 2007

Mr. Bill Skinner
City of Coalinga Community Development Department
C/O Ms. Mary B. Reents
Morro Group, Inc.
1422 Monterey Street. Suite C200
San Luis Obispo, CA 93401

Dear Ms. Reents:

Draft Environmental Impact Report for the City of Coalinga 2005-2026 General Plan Update; SCH# 2002061026

The California Department of Transportation (Caltrans), Division of Aeronautics (Division), reviewed the above-referenced document with respect to airport-related noise and safety impacts and regional aviation land use planning issues pursuant to the California Environmental Quality Act (CEQA). The Division has technical expertise in the areas of airport operational safety and airport land use compatibility. We are a funding agency for airport projects and we have permit authority for public-use and special-use airports and heliports. **16.1**

The proposal is for an update to the City of Coalinga General Plan Update for 2005-2025. Figure III-6 of the Draft Environmental Impact Report (EIR) depicts Coalinga Municipal Airport within the existing City boundary. It also shows the proposed sphere of influence (SOI), which includes the Phelps Development Area. The Phelps area is located immediately adjacent to the western edge of the Coalinga Municipal Airport. **16.2**

Page V-134 of the Draft EIR states that the airport "noise contours as shown in Figure 7 of the Initial Study prepared for the Airport Master Plan indicate that the 50 dBA [decibel] through 65 dBA CNEL [Community Noise Equivalent Level] noise contours do not extend beyond the airport boundaries into the proposed SOI." The Final EIR should include future as well as existing airport noise contours. **16.3**

Page 6-6 of the Public Review Draft discusses "upgrading the instrument approach to a full instrument approach" for the airport. The airport does not have an instrument approach at this time. The airport operates under visual flight rules not instrument. **16.4**

CEQA, Public Resources Code 21096, requires the Caltrans Airport Land Use Planning Handbook (Handbook) be utilized as a resource in the preparation of environmental documents for projects within airport land use compatibility plan boundaries or if such a plan has not been adopted, within two nautical miles of an airport. The Handbook provides a "General Plan Consistency Checklist" in Table 5A and a "Possible Airport Combining Zone Components" in **16.5**

Table 5B. The Handbook is a resource that should be applied to all public use airports and is available on-line at http://www.dot.ca.gov/hq/planning/aeronaut/htmlfile/landuse.php. **16.5 (cont'd)**

Protecting people and property on the ground from the potential consequences of near-airport aircraft accidents is also a fundamental land use compatibility-planning objective. While the chance of an aircraft injuring someone on the ground is historically quite low, an aircraft accident is a high consequence event. To protect people and property on the ground from the risks of near-airport aircraft accidents, some form of restrictions on land use are essential. The two principal methods for reducing the risk of injury and property damage on the ground are to limit the number of persons in an area and to limit the area covered by occupied structures. The potential severity of an off-airport aircraft accident is highly dependent upon the nature of the land use at the accident site. The Caltrans Handbook identifies six different airport safety zones based on risk levels. Portions of the Phelps Development Area appear to be within the Traffic Pattern Zone as defined in the Handbook. **16.6**

Business and Professions Code Section 11010 and Civil Code Sections 1102.6, 1103.4, and 1353 address buyer notification requirements for lands around airports and are available on-line at http://www.leginfo.ca.gov/calaw.html. Any person who intends to offer land for sale or lease within an airport influence area is required to disclose that fact to the person buying the property. **16.7**

The planned height of buildings, antennas, and other objects should be checked with respect to the Federal Aviation Administration (FAA) Federal Aviation Regulation (FAR) Part 77 criteria if development is close to the airport, particularly if situated within the runway approach corridors. General plans must include policies restricting the heights of structures to protect airport airspace. Information pertaining to FAR Part 77 is available on-line at https://oeaaa.faa.gov/oeaaa/external/portal.jsp. **16.8**

Education Code Section 17215 requires a school site investigation by the Division prior to acquisition of land for a proposed school site located within two miles of an airport runway. Our recommendations are submitted to the State Department of Education for use in determining acceptability of the site. This should be a consideration prior to designating residential uses in the vicinity of an airport. The Division's school site evaluation criteria is available on-line at http://www.dot.ca.gov/hq/planning/aeronaut/htmlfile/regulations.php. **16.9**

Land use practices that attract or sustain hazardous wildlife populations on or near airports can significantly increase the potential for wildlife-aircraft collisions. The FAA recommends that landfills, wastewater treatment facilities, surface mining, wetlands and other uses that have the potential to attract wildlife, be restricted in the vicinity of an airport. FAA Advisory Circular (AC) 150/5200-33 entitled "Hazardous Wildlife Attractants on or Near Airports" and AC 150/5200-34 entitled "Construction or Establishment of Landfills Near Public Airports" address these issues. For further information, please refer to the FAA website http://wildlife-mitigation.tc.faa.gov/public_html/index.html. **16.10**

In accordance with Public Utilities Code (PUC) Section 21676, local general plans and any amendments must be consistent with the adopted airport land use compatibility plans developed by **16.11**

the Fresno County Airport Land Use Commission (ALUC). In addition to submitting the proposal to the ALUC for a consistency determination, it should also be coordinated with the Coalinga Municipal Airport manager to ensure that the General Plan is consistent with future as well as existing airport operations. 16.11 (cont'd)

PUC 21676 et seq., further requires that Caltrans review and comment on the specific findings a local government intends to use when proposing to overrule an ALUC. Caltrans specifically looks at the proposed findings to gauge their relationship to their overrule. Also, pursuant to the PUC 21670 et seq., findings should show evidence that the city is minimizing "...the public's exposure to excessive noise and safety hazards within areas around public airports to the extent that these areas are not already devoted to incompatible uses." 16.12

General plans and elements must clearly demonstrate intent to adhere to ALUC policies to ensure compliance with compatibility criteria. Direct conflicts between mapped land use designations in a general plan and the ALUC criteria must be eliminated. A general plan needs to include (at the very least) policies committing the county to adopt compatibility criteria essential to ensuring that such conflicts will be avoided. The criteria do not necessarily need to be spelled out in the general plan. There are a number of ways for a city or county to address the airport consistency issue, including: 16.13

- Incorporating airport compatibility policies into the update.
- Adopting an airport-combining zoning ordinance.
- Adopting an "Airport Element" into the general plan.
- Adopting the airport compatibility plan as a "stand alone" document or as a specific plan.

The general plan must acknowledge that until ALUC compatibility criteria are incorporated into the general plan, proposals within the airport influence area must be submitted to the ALUC for review. These provisions must be included in the general plan at a minimum for it to be considered consistent with the airport compatibility land use plan. 16.14

Aviation plays a significant role in California's transportation system. This role includes the movement of people and goods within and beyond our state's network of over 250 airports. Aviation contributes nearly 9 percent of both total state employment (1.7 million jobs) and total state output ($110.7 billion) annually. These benefits are discussed in the study "Aviation in California: Benefits to Our Economy and Way of Life" available on-line at http://www.dot.ca.gov/hq/planning/aeronaut/. Aviation improves mobility, generates tax revenue, saves lives through emergency response, medical and fire fighting services, annually transports air cargo valued at over $170 billion and generates over $14 billion in tourist dollars, which in turn improves our economy and quality of life. 16.15

The protection of airports from incompatible land use encroachment is vital to California's economic future. Coalinga Municipal Airport is an economic asset that should be protected through effective airport land use compatibility planning and awareness. Although the need for compatible and safe land uses near airports in California is both a local and a state issue, airport land use commissions and airport land use compatibility plans are key to protecting an airport and the people 16.16

residing and working in the vicinity of an airport. Consideration given to the issue of compatible land uses in the vicinity of an airport should help to relieve future conflicts between airports and their neighbors.

16.16 (cont'd)

These comments reflect the areas of concern to the Division with respect to airport-related noise and safety impacts and regional airport land use planning issues. We advise you to contact our Caltrans District 6 Fresno office concerning surface transportation issues.

Thank you for the opportunity to review and comment on this proposal. If you have any questions, please call me at (916) 654-5314.

Sincerely,

Sandy Hesnard

SANDY HESNARD
Aviation Environmental Specialist

c: State Clearinghouse, Fresno County ALUC, Coalinga Municipal Airport

"Caltrans improves mobility across California"

6. State of California Department of Transportation, Division of Aeronautics

16.1 Thank you for your comments. The City understands that the division is responsible for airport-related noise and safety, and regional aviation land use planning issues.

16.2 Comment noted that airport is within City limits. The City acknowledges that the Phelps development area is within the SOI. The noise contours in the EIR do not extend beyond the city limits. Please refer to Figure V.J-2 which shows noise contours along Phelps Avenue. We do not know what noise contours will look like beyond the SOI. As projects are proposed the City will request noise studies for projects with in Airport planning area. The city is also planning on updating its Airport Master Plan and Noise Element as subsequent projects. Refer to page III-18 of the November 2008 Draft MEIR. All proposed projects will be evaluated based on the Airport Master Plan and the City's General Plan

16.3 Comment noted. The City concurs – there is no instrument approach at this time.

16.4 Thank you for directing us to the Caltrans Airport Planning Land Use Handbook

16.5 Comment noted with regard to public safety around airports. Phelps development area may be within the Traffic Pattern Zone as defined by the Handbook.

16.6 Comment noted with regard to addressing buyer notification of land around airport. This disclosure will be noted as a condition of approval of projects.

16.7 Comment noted with regard to heights of restrictions near airport. Restrictions addressed within ordinance which is a subsequent project to this EIR.

16.8 Comment noted that schools must be two miles from airport runway. School sites not determined at this time.

16.9 Comment note with regard to FAA Advisory Circular 150/5200-33 entitled "Hazardous Wildlife Attractants on or Near Airports' and AC 150/5200-34 entitled "Construction or Establishment of Landfills Near Public Airports."

16.10 Comment noted with regard to ALUC consistency requirements.

16.11 Comment noted with regard to specific findings.

16.12 Comment noted with regard to inclusion of policies committing the county to adopt compatibility criteria essential to ensuring that such conflicts be avoided

16.13 Comment noted that General Plan must be submitted to ALUC for review.

16.14 Comment noted that airports are important to quality of life.

16.15 Comment noted that airports are vital to California's economic future.

16.16 The City acknowledges that land use in the vicinity of the airport should be compatible and reduce conflicts between airport and neighbors.

16.17 Please refer to Alternative 2 reduced build-out Figure VI-1. This is the environmentally superior alternative. It provides a buffer around the airport and meets Airport Master Plan requirements.

STATE OF CALIFORNIA – THE RESOURCES AGENCY ARNOLD SCHWARZENEGGER, *Governor*

DEPARTMENT OF WATER RESOURCES
SAN JOAQUIN DISTRICT
3374 EAST SHIELDS AVENUE
FRESNO, CA 937266913

August 31, 2007

Ms. Mary B. Reents
Morro Group, Incorporated
1422 Monterey Street, C200
San Luis Obispo, CA 93401-2944

City of Coalinga General Plan Update SCH# 2002061026

Dear Ms. Reents:

The Department of Water Resources (DWR) San Joaquin District has reviewed the Draft General Plan and Update Master Environmental Impact Report for the City of Coalinga, State Clearing House #2002061026, and provides the following comments,

In Chapter 5 of the General Plan titled Safety, Air Quality and Noise Element on page 5-9; Figure 5-2, the 100-Year floodplain within the Proposed Sphere of Influence are identified under the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps (FIRM), panel numbers 3236, 3238, 3239 and 3405, dated July 19, 2001. Consider sighting the FIRM panels on Figure 5-2. Page 5-11; Flooding and Storm Drainage section, in the second paragraph under the *Storm Drain System Master Plan* title: "The off-site runoff from the mountains to the west will be intercepted by means of an open-channel and berm to be located west of Monterey Avenue. The channel is intended to interrupt the existing flow pattern by redirecting the flow that currently passes through the City to the south, into Warthan Creek." **17.1**

In the Floodplain Management ordinance current addition reprint number 30, dated January 31, 1997, Chapter 5 of the Coalinga Municipal Code, Article 4 Administration Section 9-5.401 (d) requires that a description of the extent to which any watercourse will be altered or relocated as a result of proposed development. Requires that under Section 9-5.403 that (c) whenever a watercourse is to be altered or relocated: (1) notify adjacent communities and the California Department of Water Resources prior to such alteration or relocation of a watercourse, and submit evidence of such notification to the Federal Insurance Administration, Federal Emergency Management Agency; (2) Require that the flood carrying capacity of the altered or relocated portion of said watercourse is maintained. **17.2**

DWR was not made aware of the proposed development of the alteration and relocation of the runoff at Monterey Avenue being channalized with potential impacts to Warthan Creek. There should be sufficient evidence in the General Plan (or site the Storm Drain System Master Plan if completed) that the construction of a channel that drains into Warthan Creek will not contribute to higher flood elevations due to the increase of flow into Warthan Creek and the channel capacity downstream the proposed berm. **17.3**

Construction or realignment of the overland flow into a channel requires that the city conduct a hydraulic and hydrologic analysis to show that the Base Flood Elevations (BFE) in the proposed channel will not increase the BFE of Warthan Creek upstream and downstream, or displace floodwaters from the channel or creek onto adjacent property, as well. The study must be forwarded to FEMA for their review within six months so that the city's FIRMs are updated and reflect the current conditions. **17.4**

In addition, water quality of the drainage from the channalized overland flow into Warthan Creek may impair the water body and cause downstream degradation and could impact wildlife, land use, and the California Aqueduct. Increased velocity could encourage further sediment erosion and could alter the channel downstream. These items need to be assessed and designed for no impacts. **17.5**

Management of toxic waste was discussed but it was not clear if there is a city plan to deal with the management of debris that is dumped illegally (other than toxic dumping) within the City Sphere of Influence. A letter dated March 26, 2004 addressed to the Honorable Ron Lander, Mayor of City of Coalinga, from DWR was warned that the channel capacity of Warthan Creek has been reduced by discarded debris, such as a car, washers, dryers, and even a refrigerator. There appears to be similar if not the same debris to date. Consider addressing the illegal dumping of all materials not just toxic. **17.6**

DWR would be happy to discuss these comments further and provide any information, please call me at (559) 230-3300 or Amanda Peisch at (559) 230-3307.

Sincerely,

Paula J. Landis, Chief
San Joaquin District

cc: Ms. Nadell Gayou
Chief, Environmental Review Unit
901 P St Second Floor
Sacramento CA 95814

7. State of California Department of Water Resources, San Joaquin District

17.1 Thank you for submitting your comments. Comment noted that according to the Safety, Air Quality, and Noise Element, flooding within proposed SOI is under the auspices of FEMA.

17.2 Comment noted with regard to current Floodplain Management Ordinance requirements for alteration of watercourse. City will duly notify.

17.3 Comment noted with regard to the Monterey Avenue project. The EIR consultant concurs that drainage into Warthan Creek should not contribute to higher flood elevations.

17.4 The Monterey Street specific issues will be forward to the City under separate letter so that they may be addressed appropriately.

17.5 Please refer to response 17.4 above.

17.6 Refer to policy in General Plan. Also note table III-6 on Page III-18; the city will be implementing a stream and flood ordinance including setbacks, development standards, and use of creek open space areas.

AUG 20 2007

STATE OF CALIFORNIA Arnold Schwarzenegger, Governor

NATIVE AMERICAN HERITAGE COMMISSION
915 CAPITOL MALL, ROOM 364
SACRAMENTO, CA 95814
(916) 653-6251
Fax (916) 657-5390
Web Site www.nahc.ca.gov
e-mail: ds_nahc@pacbell.net

August 13, 2007

Ms. Mary B. Reents
CITY OF COALINGA COMMUNITY DEVELOPMENT DEPARTMENT
C/O MORRO GROUP, INC.
1422 Monterey Street, Suite C200
San Luis Obispo, CA 93401-2944

Re: SCH#2002061026; CEQA Notice of Completion; draft Environmental Impact Report (DEIR) for General Plan Update Master Plan; City of Coalinga Community Development Department; Fresno County, California

Dear Ms. Reents:

The Native American Heritage Commission is the state's Trustee Agency for Native American Cultural Resources. The California Environmental Quality Act (CEQA) requires that any project that causes a substantial adverse change in the significance of an historical resource, that includes archaeological resources, is a 'significant effect' requiring the preparation of an Environmental Impact Report (EIR) per CEQA guidelines § 15064.5(b)(c). In order to comply with this provision, the lead agency (e.g. the City of San Diego) is required to assess whether the project will have an adverse impact on these resources within the 'area of potential effect (APE)', and if so, to mitigate that effect. To adequately assess the project-related impacts on historical resources, the Commission recommends the following action:

18.1

√ Contact the appropriate California Historic Resources Information Center (CHRIS). Contact information for the Information Center nearest you is available from the State Office of Historic Preservation (916/653-7278)/ http://www.ohp.parks.ca.gov/1068/files/IC%20Roster.pdf The record search will determine:

- If a part or the entire APE has been previously surveyed for cultural resources.
- If any known cultural resources have already been recorded in or adjacent to the APE.
- If the probability is low, moderate, or high that cultural resources are located in the APE.
- If a survey is required to determine whether previously unrecorded cultural resources are present.

√ 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.

- The final report containing site forms, site significance, and mitigation measurers 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 pubic disclosure.
- The final written report should be submitted within 3 months after work has been completed to the appropriate regional archaeological Information Center.

√ Contact the Native American Heritage Commission (NAHC) for:

- A Sacred Lands File (SLF) search of the project area and information on tribal contacts in the project vicinity that may have additional cultural resource information. Please provide this office with the following citation format to assist with the Sacred Lands File search request: USGS 7.5-minute quadrangle citation with name, township, range and section: .

- The NAHC advises the use of Native American Monitors to ensure proper identification and care given cultural resources that may be discovered. The NAHC recommends that contact be made with Native American Contacts on the attached list to get their input on potential project impact (APE). In some cases, the existence of a Native American cultural resources may be known only to a local tribe(s).

√ Lack of surface evidence of archeological resources does not preclude their subsurface existence.

- Lead agencies should include in their mitigation plan provisions for the identification and evaluation of accidentally discovered archeological resources, per California Environmental Quality Act (CEQA) §15064.5 (f). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American, with knowledge in cultural resources, should monitor all ground-disturbing activities.
- Lead agencies should include in their mitigation plan provisions for the disposition of recovered artifacts, in consultation with culturally affiliated Native Americans.

√ Lead agencies should include provisions for discovery of Native American human remains or unmarked cemeteries in their mitigation plans.

- CEQA Guidelines, Section 15064.5(d) requires the lead agency to work with the Native Americans identified by this Commission if the initial Study identifies the presence or likely presence of Native American human

remains within the APE. CEQA Guidelines provide for agreements with Native American, identified by the NAHC, to assure the appropriate and dignified treatment of Native American human remains and any associated grave liens.

√ Health and Safety Code §7050.5, Public Resources Code §5097.98 and Sec. §15064.5 (d) of the CEQA Guidelines mandate procedures to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery.

√ Lead agencies should consider avoidance, as defined in § 15370 of the CEQA Guidelines, when significant cultural resources are discovered during the course of project planning.

Please feel free to contact me at (916) 653-6251 if you have any questions.

Sincerely,

Dave Singleton
Program Analyst

Attachment: List of Native American Contacts

8. State of California Native American Heritage Commission

18.1 Thank you for commenting on the Draft Master EIR and General Plan Update. This letter is a standard description of the duties of the NAHC as a trustee agency. No further comment is necessary.

County of Fresno
Department of Community Health
Edward L. Moreno, M.D., M.P.H., Director-Health Officer

SEP 17 2007

September 7, 2007

999999999
LU0013989
PE 2600

Bill Skinner
City of Coalinga Community Development Director
c/o Mary B. Reents
Morrow Group, Inc.
1422 Monterey St., Suite C200
San Luis Obispo, CA 93401-2954

Dear Mr. Skinner:

Project Name: **City of Coalinga Draft Master Environmental Impact Report General Plan Update 2025 & Additional Alternative Information Routing**

Thank you for the opportunity to review the above noted document. The Fresno County Department of Community Health, Environmental Health Division has no comments at this time but requests that a copy of the final Environmental Impact Report be provided to this department upon circulation. **19.1**

Sincerely,

Glenn Allen, R.E.H.S.
Environmental Health Specialist III
Environmental Health Division

ga

cc: Briza Sholars, Development Services Division

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9. County of Fresno Department of Community Health, Environmental Health Division

19.1 Thank you for your letter. Comment noted that the Fresno Department of Community Health, Environmental Division has no comments at this time, but requests a copy of the Final EIR be provided to the Department upon circulation.

SEP - 7 2007

County of Fresno

DEPARTMENT OF PUBLIC WORKS AND PLANNING
ALAN WEAVER
DIRECTOR

September 5, 2007

Mr. Bill Skinner
Coalinga Community Development Director
c/o Mary B. Reents
Morro Group, Inc.
1422 Monterey Street, Suite C200
San Luis Obispo, CA 93401

Subject: City of Coalinga General Plan Update Master Environmental Impact Report - Notice of Completion

Mr. Skinner:

The County of Fresno appreciates the opportunity to review and comment on the City of Coalinga's Draft General Plan Update and Master Environmental Impact Report. Based on the County's review of the project, the following comments are offered for your consideration:

Circulation:

Table II-1 under "Transportation and Circulation" states that "Implementation of the proposed General Plan would result in a substantial increase in the number of vehicle trips, and contribute to an exceedance of LOS standards established by the County of Fresno and…". Under Mitigation Measure Summary it states that "New policies in the proposed General Plan and their associated implementation measures would reduce potential impacts but not to a less than significant level." 20.1

Individual projects should provide this County with a Traffic Impact Study to determine those cumulative impacts and each development should pay its fair share to reduce those impacts to a less than significant level. 20.2

Land Use:

The County is concerned about the appropriateness of the Residential Ranchette and Residential Estate land use designations. One of the major goals of the Fresno County General Plan is to protect the County's productive agricultural land by promoting compact, mixed-use and transit-oriented development within city spheres and directing new urban growth to cities. The Coalinga General Plan Update likewise contains policies and implementation measures to promote infill development and intensification of land uses, prevent sprawl and encourage smart growth and sustainable development. 20.3

DEVELOPMENT SERVICES DIVISION
2220 Tulare Street, Sixth Floor / Fresno, California 93721 / Phone (559) 262-4055 / 262-4029 / 262-4302 / 262-4022 FAX 262-4893
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Residential Ranchette and Residential Estate land uses are essentially rural in nature and are not efficient land use designations in meeting projected population demands. Fresno County would recommend the removal of those land use designations from the Update and the re-designation of those lands to a more urban density residential designation. **20.3 (cont'd)**

On Table 2-8, the percentage change in the numbers of acres designated for a given land use appears to be calculated incorrectly. As an example, the amount of land designated for Manufacturing/Business increased from 134 acres to 1,734 acres. This is an increase of 1,600 acres, and represents and increase of 1,194%, not 92% as shown in the table. **20.4**

Table 2-10 lists the non-residential maximum build-out potential as a result of the update. This table indicates the calculated potential number of jobs in Coalinga at full build-out. This information is of use in determining whether the proposed Update is likely to result in a jobs-housing balance. However, the text of the Update does not indicate why the calculations were based on an assumption that non-residential land uses would generate four jobs per acre of such uses. **20.5**

It seems unlikely that land designated for agriculture, open space and recreation would generate four jobs per acre of such uses. While it in unclear what level of employees per acre of land would be most appropriate for these land uses, using a rate of one employee per acre of such uses would decrease the maximum potential number of jobs in Coalinga by 5,898 jobs. **20.6**

It appears that a portion of the Coalinga Sphere of Influence is within the area of the Coalinga Airport Land Use Policy Plan. The MEIR and General Plan Update will need to be referred to the County's Airport Land Use Commission, who will review the documents for consistency with the adopted Coalinga Airport Land Use Policy Plan. For more information please contact the Development Services Division, Policy Planning Unit at (559) 262-4022. **20.7**

Conversion of Agricultural Lands:

The County supports the City's proposed Land Use Implementation Measure LU7-.2.1 which requires development projects to mitigate for loss of farmland by either granting a farmland conservation easement or payment of an in lieu fee to offset the cost of purchasing farmland conservation easement at a 1:1 ratio. **20.8**

Mr. Skinner
September 5, 2007
Page 3

We appreciate the opportunity to comment on the project. If you have any questions you can email me at bsholars@co.fresno.ca.us or contact me at (559) 262-4454.

Sincerely,

Briza Sholars, Planner
Development Services Division

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c: Theresa Acosta-Mena, Environmental Analysis Unit
Stan Nakagawa, Transportation
Margie McHenry, Policy Planning
Bernard Jimenez, Development Services

10. County of Fresno Department of Public Works and Planning, Development Services Division

20.1 Comment noted. We concur, traffic impacts are Class I impacts (significant).

20.2 Comment noted TIF required for projects. City has noted and has included as a policy in the General Plan.

20.3 Please refer to responses to the most recent County of Fresno letter contained in part one of this section. Comment noted that the County of Fresno would recommend re-categorizing land use. Coalinga is a rural community where equestrian uses and rodeo are a part of the rural culture, and the community is supporting the new college Farm of the Future rodeo grounds and equestrian center. Allowing for ranchettes within the city creates a sustainable framework for this culture to exist by providing residential areas where there is adequate land to keep horses. The City is adding multi modal bike, equestrian and pedestrian paths so that residents can travel by horseback to the rodeo grounds and equestrian center. The City is also considering a system of equestrian trails that would travel downtown.

20.4 Comment noted. The revised General Plan Update reflects the corrected calculations.

20.5 Please refer to response numbers 16.3 and 16.4 above that discusses the use of four employees per acre.

20.6 Please refer to response numbers 16.3 and 16.4 above that discusses the use of four employees per acre.

20.7 Comment noted that the SOI is within the Airport Land Use Policy plan and will need to be referred to the County's Airport Land Use Commission.

20.8 Comment noted with regard to farmland mitigation measures and support of a 1:1 replacement of agricultural lands lost due to changes in land uses.

LAFCO Fresno Local Agency Formation Commission

SEP 13 2007

September 10, 2007

Morro Group
Attn: Mary B. Reents
1422 Monterey Street, Suite C200
San Luis Obispo, CA 93401

Dear Ms. Reents:

Subject: Public Review Draft - City of Coalinga General Plan Update 2025 and Draft Master Environmental Impact Report

We have reviewed the City of Coalinga's General Plan Update 2025 and associated Draft Master Environmental Impact Report and offer the following comments:

1. The General Plan and Draft EIR correctly identify that LAFCo is responsible for determining, adopting, and periodically reviewing and updating the City's Sphere of Influence (SOI) and considering annexation requests. An appropriate application and materials will be required to be submitted to LAFCo to effect any changes to the City's boundary and/or SOI. **21.1**

2. The General Plan (page 2-4) incorrectly states that the City's Area of Interest (AOI) is an informal designation *"established by LAFCo…."* LAFCo does not have authority to establish an AOI, nor would the City's existing or proposed AOI be considered relevant by the Commission when reviewing organization or reorganization proposals which might be submitted for approval by LAFCo. Any special consideration given to development projects proposed outside the City's SOI, but within the AOI, over which LAFCo has no authority, is strictly between the County and the City. **21.2**

3. Table 2-1 indicates the City's current boundary encompasses 4,541 acres, and that its SOI encompasses 6,829 acres. LAFCo records indicate the area encompassed by the City equals 3,812 acres and the SOI encompasses 5,514 acres. This discrepancy should be resolved before the General Plan and the Draft MEIR are completed. **21.3**

4. The General Plan indicates that the City's population grew from 6,593 persons in 1980, to 8,212 persons in 1990, and 11,668 persons in 2000. This growth equates to a 24% increase in population from 1980 to 1990 and a 42% increase in population from 1990 to 2000. **21.4**

LAFCo Office: 2115 Kern Street, Suite 310, Fresno, CA 93721
Phone: (559) 495-0604 • Fax: (559) 495-0655 • E-mail: cfleming@co.fresno.ca.us

Table 2-3 projects the 2005 household population of 11,217 growing to 22,188 (an increase of 10,917) in 2025, with an average annual growth rate of 3.5% (total growth of 97%). The projected growth identified in Table 2-3 for this period is comparable to that experienced in previous decades cited above and would appear to be a reasonable projection of the City's population through the end of the planning period.

21.4 (cont'd)

The General Plan (p. 2-13) states, "There is good reason to believe that Coalinga's future growth will exceed historic growth rates" and cites what is described as "Foreseeable Development" and "Possible Future Development" listed in Table 2-4. Table 2-4 identifies potential for a population increase up to an additional 27,152 (total population 38,369) should all of this foreseeable and possible future development occur. Further, under Population and Growth Assumptions (p. 2-14), potential for another additional 5,486 persons for a total population of 43,855 (290% growth) is identified due to the growth spurred by the developments listed in Table 2-4.

Though the General Plan describes how this potential population may be reached, the growth assumptions identified in the General Plan do not appear to be realistic. The City assumes all current development proposals will be developed within the 20 year planning period and that this proposed development will also result in additional development within the same period. The growth rate assumptions equate to an annual growth rate greater than 7%. This rate is significantly greater than the City's historic trend. Further, the growth rate assumptions do not take into account lack of available or foreseeable water supplies to serve such a population (see point No. 9, below).

Per Table 2-1, the City proposes an amended SOI 10,811 acres in size, an increase of 58% above City's current SOI of 6,829 identified in Table 2-1 (96% larger than LAFCo records). The General Plan contemplates that full build-out of this planning area could result in a population of 63,515, indicating that the proposed SOI is considerably greater in size than is necessary to accommodate the projected population of 22,188 identified in Table 2-3, or even the City's estimate of 43,855. Given this information, the Commission may not be able to find that the proposed SOI is consistent with LAFCo's Policy Section 330-08, as listed below:

> *The Commission requests that a Sphere of Influence update be comprehensive and based on historical growth patterns, using a twenty to twenty-five year projection, prepared with a city and county general plan update for the community.*

5. LAFCo's primary tasks include promoting orderly development and *"balancing that development with sometimes competing state interests of discouraging urban sprawl, preserving open space and prime agricultural lands…."*

21.5

As indicated in the General Plan, a substantial portion of the area to be included within the City's proposed SOI is considered either Prime Agricultural Land or Farmland of Local Importance. It is understood that in order for the City to develop in a logical, orderly way, annexation of some of these agricultural lands is inevitable. The efficient use of this land, therefore, is of great importance to LAFCo. LAFCo Policy Section 103 states, *"The Commission encourages well-planned, orderly, and compact urban development patterns for all developing areas."* Policy Section 104 further states, *"Proposals which would conflict with the goals of maintaining the physical and economic integrity of open space lands, agricultural lands,...as indicated in the City or County General Plan, shall be discouraged."*

21.5 (cont'd)

The proposed SOI will be considered with these policies in mind. It should be noted that the City's Residential Ranchette (RR) land use designation which allows a maximum of one residence per 10 acres, and the City's Residential Estate (RE) land use designation which allows a maximum of two residences per acre would not be considered "compact urban development".

6. The General Plan (p. 3-12) anticipates that all of the agricultural land under Williamson Act contracts within the proposed SOI, 4,466 acres, will be converted to urban use and removed from the Williamson Act program by 2025. Please note that the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000 has much to say regarding inclusion of land under Williamson Act contract into a City's SOI, or annexation of such land by the City. The City may be required to succeed to the contract, or to terminate the contract. If the City elects to terminate a contract, such termination must be approved by the County Board of Supervisors. Additionally, substantial penalties are levied by the State for termination of contracts.

21.6

7. In addressing potential impacts to agriculture, the Draft Master Environmental Impact Report (p. V-60) includes the California Department of Conservation's (CDC) definition of "Prime Farmland" and "Farmland of Statewide Importance." Please note that the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000 definition of "Prime Agricultural Land" differs from CDC's definitions of Prime Farmland and Farmland of Statewide Importance, and may be considered more inclusive than the CDC's definitions. For LAFCo purposes, the Draft MEIR must consider loss of Prime Agricultural Land as defined by the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000 (Government Code Section 56064), below:

21.7

> *"Prime agricultural land" means an area of land, whether a single parcel or contiguous parcels, that has not been developed for a use other than an agricultural use and that meets any of the following qualifications:*
>
> *(a) Land that qualifies, if irrigated, for rating as class I or class II in the USDA Natural Resources Conservation Service land use capability*

classification, whether or not land is actually irrigated, provided that irrigation is feasible.

(b) Land that qualifies for rating 80 through 100 Storie Index Rating.

(c) Land that supports livestock used for the production of food and fiber and that has an annual carrying capacity equivalent to at least one animal unit per acre as defined by the United States Department of Agriculture in the National Handbook on Range and Related Grazing Lands, July, 1967, developed pursuant to Public Law 46, December 1935.

(d) Land planted with fruit or nut-bearing trees, vines, bushes, or crops that have a nonbearing period of less than five years and that will return during the commercial bearing period on an annual basis from the production of unprocessed agricultural plant production not less than four hundred dollars ($400) per acre.

(e) Land that has returned from the production of unprocessed agricultural plant products an annual gross value of not less than four hundred dollars ($400) per acre for three of the previous five calendar years.

21.7 (cont'd)

8. The Draft MEIR (p. V-76) states "*LAFCO boards must contain two county supervisors, two representatives of the county's cities, two representatives of special districts within the county, and one member of the public.*" This statement is incorrect. A LAFCo may include two representatives from special districts, but are not required to. Fresno LAFCo does not include special district representatives at this time.

21.8

9. The Draft MEIR (p. V-101) states that the City of Coalinga has a contract, valid through 2008, which obligates the Bureau of Reclamation to furnish Coalinga with up to 10,000 acre feet of water annually. Should the City receive a full allotment of 10,000 acre feet, it could support a population up to 21,276 based on annual usage of .47 acre feet/person (p. V-109). The City's contract includes provisions for reducing the City's water allocation during periods of drought. Reductions are staed to be *"variable"* and *"based on the severity and duration of the drought."* Reductions may result, during the second year of drought, up to 50% of the City's historic use. This section of the Draft MEIR concludes *"...for planning purposes it is advisable to determine the water supply based on a full reduction scenario."*

21.9

The City has stated that foreseeable and possible future development could result in a population of nearly 44,000 people, and that full build out of the SOI at maximum allowed densities could result in a population greater than 63,000 people. As indicated above, given water availability and average use, the City has only enough water to support a future population of 21,276. Further, water delivery reductions due to drought conditions could result in the City being able to

support a population of only 10,638 people based on current per capita usage. This population is substantially smaller than the City's current population.

21.9 (cont'd)

Though City policies state the City "shall permit new development when accompanied by adequate and efficient utility infrastructure and services…" it is unclear how the City will address this shortage. We do not believe that Implementation Measure PFS8-1.5, related to anticipating *"potential annual growth and project water supply demand in order to control growth and ensure adequate long-term water supply"* thoroughly addresses this issue. The Draft MEIR should more thoroughly address this potential shortage, identifying water use reduction measures, and identifying potential new water sources. It should be noted that as part of its Sphere of Influence Update application, the City will be required to provide an updated Master Service Plan which includes identifying water resources which would serve existing and future developments.

10. The Draft MEIR (p. VII-1), states *"The Proposed General Plan anticipates the City's projected level of growth, while avoiding harm to the environment and improving the overall quality of life in Coalinga, through the following guiding principals".* Included among these guiding principals is: *"Accommodating increases in population within a relatively small area as compared to the area encompassed in Coalinga's entire AOI."*

21.10

This logic appears to be faulty. If a relatively small SOI is proposed in comparison to a large AOI, and the relatively small SOI is fully built-out in the future, build-out of the SOI would result in no less harm to the environment than it would if the SOI and AOI boundaries were identical. This statement should be deleted or revised such that it can be supported.

We look forward to receiving the final versions of the MEIR and Coalinga's Updated General Plan. If you have any questions, please contact me at (559) 495-0604.

Sincerely,

Darrel S. Schmidt

Darrel Schmidt, Deputy Executive Officer
Fresno LAFCo

C: Steve Julian, City Manager, City of Coalinga
Bill Skinner, Valley Planning Associates
Alan Weaver, Director, Fresno County Department of Public Works and Planning
Bernard Jimenez, Manager, Fresno County Development Services Division

G:\LAFCO WORKING FILES\CEQA\Responses\Coalinga General Plan 2025.doc

11. Fresno Local Agency Formation Commission

21.1 Comment noted with regard to LAFCO responsibilityies

21.2 Comment noted with regard to LAFCO not having authority to establish AOI. The City wishes to comment on any County activities that would occur within the AOI and is noting that the AOI is being considered for later development.

21.3 Comment noted with regard to discrepancies with the amount of acreage within the city limits. This has been corrected. Please refer to the various errata sheet items addressing this issue.

21.4 Please refer to the various errata sheet items addressing this issue.

21.5 Comment noted with regard to LAFCO's task to promote orderly development. We concur that Coalinga can not grow without taking prime Agricultural land. Please refer to response to the County of Fresno comment 19.3.

21.6 Comment noted. The City understands that it must consider loss of agricultural land as defined by the Cortese-Knox Hertzberg Local Government Reorganization Act of 2000.

21.7 Comment noted please refer to the responses to the December 18, 2008, LAFCO letter.

21.8 Comment noted regarding page V-76. Please refer to Page V-58 of revised DEIR. The revised Draft MEIR corrects this statement.

21.9 Comment noted with regard to population and water resources; regardless, the city doesn't have enough water. The City cannot grow beyond its ability to provide water. Please refer to revised section in the November 2008 Draft MEIR as well as your most recent comment letter dated December 18, 2008.

21.10 Please refer to response to your December 18, 2008, letter with regard to SOI and AOI.

HCM FARMS
P. O. Box 773
Coalinga, CA 93210

September 4, 2007

City Of Coalinga
155 West Durian
Coalinga, CA 93210

Attention: Bill Skinner – Contract Director
Community Development Department

Dear Mr. Skinner:

As per our conversation last week, this letter will serve as our formal request to change the zoning on our property at 29046 West Jayne Ave, Coalinga, CA. APN: 070-07-025s from Light Industrial to Commercial Zoning. 22.1

If you have any questions or need additional information from us, please feel free to call at 559-977-3723.

Sincerely

Melinda E Vierhus

MELINDA E. VIERHUS

12. HCM Farms

22.1 Comment noted. This request will be forwarded to the City of Coalinga Planning Commission for discussion.

McPHARLIN
SPRINKLES &
THOMAS LLP
ATTORNEYS AT LAW

TEN ALMADEN BLVD., SUITE 1460
SAN JOSE, CALIFORNIA 95113
TELEPHONE (408) 293-1900
FACSIMILE (408) 293-1999
WWW.MSTPARTNERS.COM

September 7, 2007

PAUL S. AVILLA
KATHARINE L. HARDT-MASON
MARY L. MALYSZ
LINDA HENDRIX McPHARLIN
JANE P. RELYEA
ELAINE M. SEID
CATHERINE C. SPRINKLES
ANNE C. STROMBERG
N. DAVID THOMAS

Via Email and First Class Mail

Mr. Bill Skinner
Community Development Director
City of Coalinga
c/o Mary Reents
Morro Group, Inc.
1442 Monterey Street, Suite C200
San Luis Obispo, CA 93401

Re: Comments on the Draft Master Environmental Impact Report for the City of Coalinga General Plan Update 2025 (the "**DEIR**")

Dear Mr. Skinner and Ms. Reents:

Thank you for the opportunity to review and comment on the DEIR. On behalf of my clients, Los Gatos Creek Estates, LLC, and Warthan Heights, LLC, following please find our comments on the DEIR:

1. Page III-15: It appears that Table III-3 is intended to identify all Current Residential Development Proposals both within and outside of the existing City Limits. As you know, my clients are the project proponents of the "Phelps" and "Warthan Heights" projects, respectively. With regard to the former, the acreage identified in Table III-3 does not include all of the property presently being proposed for development. Phase I of Phelps, which we commonly refer to as the "Villages of Los Gatos Creek" project, totals 433.1 acres with a proposed Dwelling Unit count of 1,056. Per the Notes on Table III-3, this project equates to a population increase of 3,168 persons. Phase II of Phelps, which we commonly refer to as the "Los Gatos Creek Estates" project, totals 2,876.9 acres with a proposed Dwelling Unit count of 9,654. When multiplied by the population estimate of 3.0 persons per household, the population increase equates to 28,962 persons. When added together with the Warthan Heights project, the total Future Development Acreage becomes 3586, the Dwelling Units become 11,746, and the Population increase becomes 35,238 persons. These revisions also result in changes to the Total Acres (4,102), Total Dwelling Units (13,626), and Total Population Increase (40,784). We believe that the additional property and related values identified above should be included within Table III-3. **23.1**

2. Page III-19: It appears that Figure III-6 is also intended to identify all Foreseeable Projects. This Figure does not, however, include that portion of the Los Gatos Creek Estates project immediately north of the "Phelps" project and adjacent to Highway 33. This portion of the proposed "Phelps" project is not included within the Sphere of Influence identified on this Figure, but rather within Alternative Four, and is very much a part of the proposed development. We believe the portion of the "Phelps" project not shown on Figure III-6 should be shown on Figure III-6 given its relationship to the remaining "Phelps" project and its inclusion within Alternative Four. **23.2**

3. Page V-19: The Mitigation Measure set forth in S3-1 by reference includes the Associated Implementation Measures set froth in S3-1.1 through S3-1.4 of the General Plan Update. Those Implementation Measures identify with specificity the type of mitigation required to address potential erosion and sedimentation issues. For that reason, we believe it not to be necessary to include the statement immediately following Mitigation Measure S3-1 which sates that "This policy includes a number of implementation measures as well that require applicants to demonstrate that new developments will not alter drainage patterns and flow rates". This statement could be viewed as overriding or altering the terms of the Implementation Measures set forth in the General Plan Update, thereby causing difficulty in implementation. **23.3**

4. Page V-65: Figure AG-2 identifies all of the Property which is both subject to Williamson Act Contracts and Notices of Non-Renewal. The property both of my clients are in the process of developing is shown as being subject to Williamson Act Contracts, but not having Notices of Non-Renewal recorded against the same. Notices of Non-Renewal have, however, been recorded against all of the property known as The Villages of Los Gatos Creek, Los Gatos Creek Estates, and Warthan Heights. Copies of the Notices of Non- Renewal are available upon request. Given the effect of Non-Renewal, we believe this Figure should be revised to reflect this information. **23.4**

5. Pages V-69, V-70 and V-71: The Residual Impacts of AG Impact 1, AG Impact 2, and AG Impact 3 are all shown as being "*significant and unavoidable impacts, Class I*". However, each of these Impacts includes mitigation measures which would significantly reduce, and we believe, mitigate the impacts to a "*less than significant level, Class II*". The impacts resulting from conversion of Prime Farmland to non-agricultural use (AG Impact 1) and the loss of Williamson Act Contracts (AG Impact 2) are being off-set by 1:1 conservation easements or in lieu fees. These easements or fees will provide significant long-term benefit to the community in the way of permanent agricultural land, while at the same time providing orderly and planned development which ultimately leads to more jobs and a more prosperous community. In other words, the impacts resulting from the loss of agriculturally productive land (AG Impact 3) are off set by the long term gain to the City in the form of more jobs and a permanent agricultural buffer. Based on the foregoing, we believe the residual impacts resulting from AG Impacts 1 through 3 should be identified as "*less than significant level, Class II*", and the Cumulative Impacts should be identified as the same. **23.5**

6. Page V-84: It appears that LUPH Impact 1 is intended to address premature construction and annexation of property into the City. According to the information set forth in the MEIR, the population growth estimated by the State suggests that the number of Dwelling Units available in the City based on available acreage is not sufficient to meet the minimum estimated population growth. In other words, construction and annexation of land outside of the City limits will be necessary to meet the minimum anticipated growth. And while it is possible that developers will request **23.6**

development approvals and annexation prior to immediate demand for new Dwelling Units, it is within the power of the City to pace development with demand, thereby avoiding premature annexations and growth. Thus, we believe it to be inconsistent to state that premature annexations and growth are likely to occur, when in fact annexations and construction are necessary to meet the anticipate population increases.

23.6 (cont'd)

As always, please do not hesitate to contact me if you have any questions or require further information regarding any of the foregoing. We look forward to the opportunity to work with you on this project.

Best regards,

Katharine Hardt-Mason

cc: Glenn M. Pace
James Pace
David Pace
Michael Hitchcock
Jeff Chang

13. McPharlin Sprinkles & Thomas LLP

23.1 This letter is no longer applicable. Comment noted with regard to the fourth alternative. The current draft GPU and EIR have included the Los Gatos Estates area within the SOI

23.2 Please see revised project description. Alternative four is now part of the proposed project and is included in the AOI

23.3 Comment noted with regard to GPU implementation measures. Revision of the Streambed and Flood ordinance are a subsequent project to the EIR.

23.4 Comment noted with regard to non-renewal. Figure 5.E-2 has been revised. Thank you for your comment regarding notice of non-renewal. Your notice of non-renewal was not shown on the Mitigation Monitoring Plan map at the time the EIR was prepared.

23.5 The mitigation measures contained the EIR reduce but not significantly agriculture impacts. Provision of fees and easements reduces but does not avoid impacts to agricultural lands and overriding considerations will be required.

23.6 Comment noted with regard to necessity of annexation. It is the City's intent to infill before annexation. Annexations will have to be approved by Fresno LAFCO.

Mary Reents

From: Steve Ciccarelli [scicc@cox.net]
Sent: Friday, September 07, 2007 2:58 PM
To: mreents@morrogroup.com
Cc: rwsemple@hotmail.com
Subject: Coalinga General Plan Comments

I am a resident of the City of Coalinga and own my home at 284 Lincoln St. My comments on the Coalinga General Plan Update Environmental Impact Report reflect my concern for the living conditions of current residents and any who would choose to make this community their home.

Air Quality
My family lived through the May 2, 1983 earthquake that greatly impacted the structures, businesses, and lives of many Coalinga residents. No one would presume to mitigate the seismic hazard known to exist, but the impacts could be better minimized. While the prediction of seismic activity has not been successful, the awareness and preparation for such natural disasters can be improved. An assessment of substandard public structures, retrofitting, and proper posting could identify places where dangers exist. Also, shelter and provisions could be available where safer public facilities exist. I'm sure the prisons and State hospital would be better prepared to survive a major earthquake than most of the community. We should provide as safe a facility for all our citizens, not just those incarcerated. **24.1**

Seismic Safety
The air quality for the City of Coalinga is greatly impacted by surrounding industry. The oil field liquids and vapors are very toxic and have to be contained or removed from their location during the pumping and transportation process. According to the State Division of Oil and Gas these operations have greatly increased as the price for oil has made it more valuable to activate old wells and drill more new wells. Farming practices also produce air pollution due to chemicals used for spraying near residential areas as is common for cotton crop defoliation. While seasonal crops have been reduced, more permanent crops have been planted with new chemical practices. Material Safety Data Sheets (MSDS) for such chemicals should be posted and/or available to citizens at City Hall. Most obnoxious and obvious is the stench of excrement generated from nearby cattle feedlot operations. Some analysis should be made of these operations. Has it changed or increased over the past General Plan period and do these practices have greater air quality impacts to the residents of Coalinga? I believe the almost daily smell of manure to be a significant and mitigable hazard to the residents of Coalinga. Technology such as water curtains and more frequent cleanup could help. These major air pollution problems should be addressed by this General Plan and others regardless of jurisdictional sphere of influence. As the Air Pollution Control Districts realized some years ago, such pollution is not relegated to an arbitrary governmental boundary line. **24.2**

Housing
Low-income and student housing has failed to materialize after the 1983 earthquake despite requirements by the Redevelopment Agency. Rather than minimize or delay requirements for new subdivisions to provide the necessary share of low-income housing, the City needs a more aggressive process to obtain such housing. **24.3**

Urban Forest Element
Years ago the City of Coalinga pioneered the addition of an Urban Forest Element in its General Plan. While efforts were made to provide a street tree list and even a prisoner operated tree farm, the benefits of an Urban Forest Element and subsequent positive environmental and even economic impacts should be included. **24.4**

Finally, I am hopeful the City of Coalinga can be an example of quality living on the Westside of the valley, nestled in "Pleasant Valley". I want a safe community so we could all be proud to say we live here. **24.5**

Robert W. Semple

9/13/2007

14. Robert Semple

24.1 Comment noted regarding seismic safety risk and need for shelters. Please refer to page 5-7 of the EIR which discusses Hazards and policies within the GPU. The City is required to have and Emergency Preparedness plan.

24.2 Please refer to page 5-145 of the November 2008 Draft EIR with regard to odors. Odors are addressed on a project by project basis.

24.3 Comment noted regarding City being more aggressive regarding provisions for low and medium income housing. Please refer to page 3-18 of the EIR. The housing element update is listed as a subsequent project and should be updated within one year of approval of General Plan Update.

24.4 Comment noted regarding Urban Forest Element. Because of significant water shortages it is not likely that the groundwater basin will support tree growth. The City must practice significant water reduction to need existing needs. Drought tolerant landscaping will be promoted in order to reduce consumption of water.

24.5 Comment noted with regard to wanting a safe community. The City concurs that safety is of paramount concern.

WELLINGTON CORPORATION
of Northern California

MEMORANDUM

408-782-1669 FAX 408-782-1662
18640 Sutter Blvd., STE 100, Morgan Hill, CA 95037
www.WellingtonCorporation.com

DATE:	**August 25, 2007**
ATTENTION:	**Bill Skinner, Coalinga Planning Director**
CC:	
FROM:	**Glenn Pace, President**
SUBJECT:	**Coalinga General Plan Update**

Dear Bill,

On August 23, 2007 we received a copy of the proposed July 2007 Draft General Plan Update and the July 2007 Draft Master Environmental Impact Report for the City of Coalinga. After a limited review of the proposed plan areas, including the alternatives, it is clear that our Villages of Los Gatos Creek Master Planned Community area, a conceptual plan of which is attached, is not satisfactorily included in either of these documents.

As you know, we have been working on this project for over two and a half years, and have invested substantial time, effort, and money in it. We have actively worked with City of Coalinga in revising the project to meet the needs of the present community, consistent with the quality of the Master Planned Community that we hope to create. We have attended many City Council meetings over the past three years and have provided significant input related to our projects. We have also strived to be good citizens and make positive impacts in the community of Coalinga and we hope to be able to continue to do this in the future. However, because of the huge infrastructure costs in developing a large Master Planned Community such as we are proposing, we must have enough land, and ultimately lots, over which we can spread these costs or this project will not be financially viable for us. 25.1

In other words, it is imperative that our entire project be included in these planning documents. We therefore request that the draft General Plan Update and the environmental analysis be revised to include all of the plan area shown on the conceptual plan attached. Please let us know if you need more definitive information regarding the property that we are requesting to be included in these documents. 25.2

Finally, please know that we have contacted the property owners of the property included within the plan area regarding this issue and we have informed them that the present documents seriously jeopardize our ability to develop and purchase their land. That is, without their property being included in the General Plan update, our interest in continuing the purchase of their properties is greatly diminished. 25.3

Please feel free to contact me if you have any questions or concerns. I look forward to a speedy resolution of this issue.

Sincerely,

Glenn

Glenn

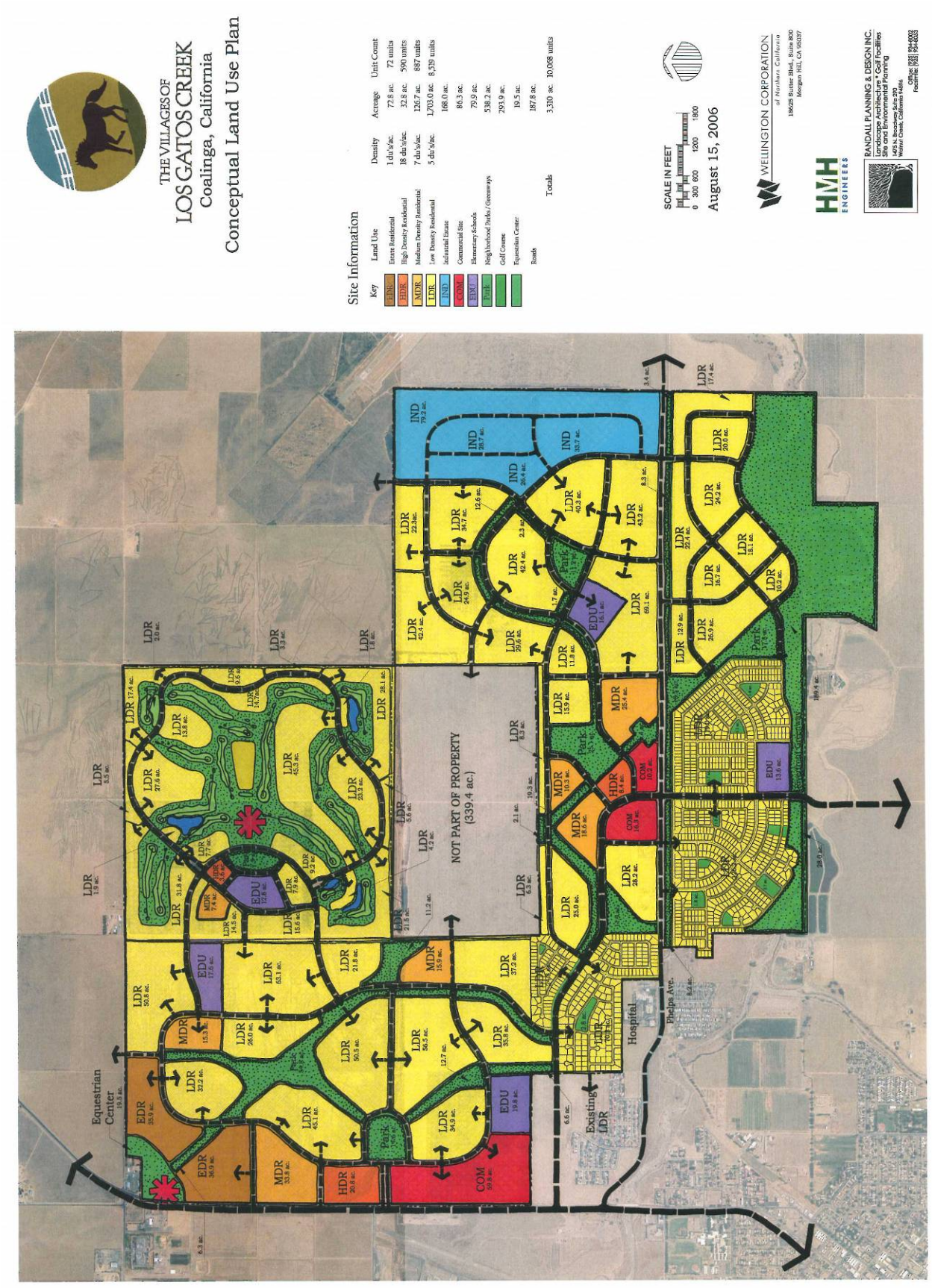
Attachment

AGREED: _____ Date: _____

AGREED: _____ Date: _____

AGREED: _____ Date: _____

AGREED: _____ Date: _____


THE VILLAGES OF
LOS GATOS CREEK
Coalinga, California
Conceptual Land Use Plan
Site Information
Key
Land Use
Density
Acreage
Unit Count
EDR
Estate Residential
1 du/s/ac.
72.8 ac.
72 units
HDR
High Density Residential
18 du/s/ac.
32.8 ac.
590 units
MDR
Medium Density Residential
7 du/s/ac.
126.7 ac.
887 units
LDR
Low Density Residential
5 du/s/ac.
1,703.0 ac.
8,539 units
IND
Industrial Estate
168.0 ac.
COM
Commercial Site
86.3 ac.
EDU
Elementary Schools
79.9 ac.
Park
Neighborhood Parks / Greenways
538.2 ac.
Golf Course
293.9 ac.
Equestrian Center
19.5 ac.
Roads
187.8 ac.
Totals
3,310 ac.
10,098 units
SCALE IN FEET
0 300 600 1200 1800
August 15, 2006
WELLINGTON CORPORATION
of Northern California
18626 Butter Blvd., Suite 800
Morgan Hill, CA 95037
HMH ENGINEERS
RANDALL PLANNING & DESIGN INC.
Landscape Architecture * Golf Facilities
Site and Environmental Planning
1420 N. Rockbury Suite 250
Walnut Creek, California 94596
Office: (925) 934-8002
Facsimile: (925) 934-8003
NOT PART OF PROPERTY
(339.4 ac.)
Equestrian Center
Existing LDR
Hospital
Phelps Ave.

15. Wellington Corporation

25.1 Comment noted regarding the Villages of Los Gatos Creek and cost of project preparation. The revised GPU includes the entire Los Gatos Creek Estates area in the AOI.

25.2 Comment noted. The Los Gatos Creek Estates area has been included in the GPU.

25.3 Comment noted with regard to purchase of properties.

C. ADDITIONAL INFORMATION PACKET COMMENT LETTERS AND RESPONSES

The following agencies and members of the public have prepared comments on the Additional Information Packet, distributed on August 30, 2007:

Federal, State, and Local Agencies		Page
State of California Department of Transportation District 6 Letter of September 28, 2007	1352 West Olive Avenue P.O. Box 12616 Fresno, CA 93778 Contact: Michael Navarro	X-112
County of Fresno Department of Public Works and Planning Development Services Division Letter of October 1, 2007	2220 Tulare Street, Sixth Floor Fresno, CA 93721 Contact: Briza Sholars	X-114
Fresno Local Agency Formation Commission Letter of September 17, 2007	2115 Kern Street, Suite 310 Fresno, CA 93721 Contact: Darryl Schmidt	X-119

General Public and Private Organizations		Page
McPharlin Sprinkles & Thomas LLP Letter of September 21, 2007	Ten Almaden Boulevard, Suite 1460 San Jose, CA 95113 Contact: Katharine Hardt-Mason	X-123
McPharlin Sprinkles & Thomas LLP Comments on General Plan Update 2025 Letter of October 1, 2007	Ten Almaden Boulevard, Suite 1460 San Jose, CA 95113 Contact: Katharine Hardt-Mason	X-127

The letters of comment are given in the above order with the responses following the individual letters. Letters of comment are reproduced in total, and numerical annotation has been added as appropriate to delineate and reference the responses to those comments. The pages of the letters have been re-numbered to conform to the page sequence of this section.

STATE OF CALIFORNIA—BUSINESS, TRANSPORTATION AND HOUSING AGENCY ARNOLD SCHWARZENEGGER, Governor

DEPARTMENT OF TRANSPORTATION
DISTRICT 6
1352 WEST OLIVE AVENUE
P.O. BOX 12616
FRESNO, CA 93778-2616
PHONE (559) 445-5868
FAX (559) 488-4088
TTY (559) 488-4066

OCT - 1 2007

Flex your power!
Be energy efficient!

September 28, 2007

2131-IGR/CEQA
6-FRE-GEN
MASTER EIR/G.P. UPDATE
INCREASED BUILDOUT
ALTERNATIVE
SCH 2002061026

Mr. Bill Skinner
City of Coalinga
C/O Mary B. Reents
Morro Group, Inc.
1422 Monterey Street, Suite C200
San Luis Obispo, CA 93401

Dear Mr. Skinner:

We have completed our review of the additional alternative provided by the City of Coalinga pertaining to the update of their General Plan. Caltrans has the following comments:

Our comments dated August 27, 2007 (copy enclosed) continue to be valid. These prior comments should be directed towards this increased buildout alternative, and the project as a whole. **26.1**

Please be advised that any future development adjacent to a State Route, whether the entitlement is deemed by the lead agency to be discretionary or ministerial should be sent to Caltrans for review. Also, please send a response to our comments prior to staff's recommendations to the Planning Commission and the City Council. If you have any questions, please call me at (559) 445-5868. **26.2**

Sincerely,

MICHAEL NAVARRO
Office of Transportation Planning
District 06

Enclosure

C: State Clearinghouse

"Caltrans improves mobility across California"

1. State of California Department of Transportation, District 6

26.1 Comment noted. Comments dated August 27, 2007 continue to be valid.

26.2 Comment noted. Any future development adjacent to a State Route should be sent to Caltrans for review. Response to comments shall be sent to Planning Commission and City Council prior to staff's recommendations.

County of Fresno

DEPARTMENT OF PUBLIC WORKS AND PLANNING
ALAN WEAVER
DIRECTOR

October 1, 2007

Mr. Bill Skinner
Coalinga Community Development Director
c/o Mary B. Reents
Morro Group, Inc.
1422 Monterey Street, Suite C200
San Luis Obispo, CA 93401

Subject: City of Coalinga General Plan Update Master Environmental Impact Report
Significant New information, Additional Alternative

Mr. Skinner:

The County of Fresno appreciates the opportunity to review and comment on the significant new information added alternative for the City of Coalinga's Draft General Plan Update and Master Environmental Impact Report. Based on the County's review of the project, the following comments are offered for your consideration:

Circulation:

Based on conclusions of Alternatives Analysis and without having future information for which of the County's roads and intersections are impacted, reduction of LOS D to LOS F is of concern to the County. Please provide a Traffic Impact Study for our review. 27.1

Land Use:

Table VI-4 and the related text on page VI-15, appears to include a number of errors. Below is a summary of errors noted: 27.2

- The SOI acreage listed totals to 6,541 acres rather than 6,741 acres
- The SOI dwelling units totals to 14,148 units rather than 14,889 units
- The SOI population totals to 44,665 rather than 44,666
- The total acres listed totals to 10,747 rather than 10,745
- The total population listed totals to 77,164 rather than 77,165
- Public Facilities acreage listed totals to 2,394 rather than 2,395
- Residential Estate acreage listed totals to 294 rather than 494
- Residential Medium Density acreage listed totals to 422 rather than 423
- Residential High Density dwelling units listed totals to 4,282 rather than 5,023
- Residential Ranchette has a potential dwelling units per acre density of 0.1. This would result in 53 dwelling units and 158 population, based on the acres designated residential ranchette.

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The text states that the increased build-out alternative would add 912 acres to the proposed sphere of influence (SOI). The text also states that the additional area will increase the SOI from 5,800 acres to approximately 6,741 acres. However, the previously routed Draft Master EIR and General Plan Update listed the proposed SOI as covering 6,271 acres. Assuming that 6,271 acres is the area of the SOI proposed by the General Plan Update, and 6,741 acres is the area of the SOI proposed by the increased build-out alternative, this alternative only results in an increase of 470 acres. 27.3

A comparison of Table VI-4 (of the increased build-out alternative) and Table 2-5 (of the General Plan Update), shows an increase of a total of 659 acres in various land use designations. This is 187 acres more than the 470 acres determined by simply calculating the difference between the two listed acreages for the SOI. Table VI-4 also does not include a category to account for acreage used for road right-of-way. 27.4

Figure VI-3 appears to propose removing from the SOI a portion of land, at the northwest corner of Jayne and Monterey Avenues, that is within the existing Coalinga city limits. This portion of land should not be removed from the SOI. 27.5

Figure VI-3 also appears to propose the removal of the Coalinga airport from the SOI. The Coalinga airport is within the existing Coalinga city limits, and should remain in the Coalinga SOI. 27.6

Comparing Figure VI-3 to Figure 2-5A of the General Plan Update, the increased build-out alternative appears to expand the SOI to include APNs 070-041-35s, 070-050-22s and 070-070-51s. These APNs comprise a total of approximately 1,600 acres. This is 688 acres more than 912 acres listed in the text, and 1,130 acres more than the 470 acres calculated as the difference between the two listed acres for the SOI in the General Plan Update and under the increased build-out alternative. 27.7

Figure VI-3 shows an approximate 340-acre area designated for Agriculture within the additional area proposed to be added to the SOI under the increased build-out alternative. This 340 acre area is also mentioned under Land Use, Population and Housing on page VI-19. However, this increase is not reflected in Table VI-4, which lists the same acreage of land designated Agriculture as does Table 2-5 of the General Plan Update. 27.8

Overall, Table VI-4 appears to contain too many inconsistencies for the County to perform a satisfactory analysis of what is proposed under the increased build-out alternative. 27.9

On page VI-19, the section on Land Use, Population and Housing states that the increased build-out alternative has a similar ratio of acreage devoted to housing versus that devoted to commercial or manufacturing/business as the proposed General Plan. 27.10

Under the previously routed General Plan Update, the ratio between acreage devoted to housing versus that devoted to commercial or manufacturing/business comes out to 1.7:1. Using the total acreages under the increased build-out alternative results in a ratio of 2.04:1. However, looking only at the acreage added to the SOI by the increased build-out alternative results in a ratio of 24.4:1. This reflects the fact that the acreages listed in Table 27.11

VI-4 show an increase of 757 acres devoted to housing and an increase of only 31 acres devoted to commercial or manufacturing/business. 27.11 (cont'd)

In our previous comments, we noted issues related to the potential number of jobs at full build-out. The General Plan Update did not provide any information to indicate why four jobs per acre of non-residential land was a reasonable estimate. Using an estimate of four jobs per acre of commercial, public facilities or industrial land, and one job per acre for other non-residential land uses (including open space, agriculture and recreation), a maximum potential of 5,898 jobs was calculated. Using those same numbers, the increased build-out alternative would produce an increase of 680 jobs at full build-out based on the acreages listed in Table VI-4. At the same time, the maximum potential population would increase by 13,650 residents (4,550 households). 27.12

The increased build-out alternative acts to push the City of Coalinga further from attaining a jobs/housing balance, which could result in increased traffic on roads as residents are forced to travel outside the City of Coalinga in search of employment. 27.13

We appreciate the opportunity to comment on the project. If you have any questions you can email me at bsholars@co.fresno.ca.us or contact me at (559) 262-4454.

Sincerely,

Briza Sholars, Planner
Development Services Division

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c: Theresa Acosta-Mena, Environmental Analysis Unit
Mohammad Alimi, Design
Margie McHenry, Policy Planning
Bernard Jimenez, Development Services

2. County of Fresno Department of Public Works and Planning, Development Services Division

27.1 The Traffic Impact Study was prepared by KD Anderson and Associates, dated August 28, 2008. Please refer to Appendix C of the revised Draft MEIR.

27.2 Please refer to the revised Alternatives section in the revised Draft Master EIR dated November, 2008, the information has changed.

27.3 Please refer to the revised Alternatives section in the revised Draft Master EIR dated November, 2008, the information has changed.

27.4 Please refer to the revised Alternatives section in the revised Draft Master EIR dated November, 2008, the information has changed.

27.5 Please refer to the revised Alternatives section in the revised Draft Master EIR dated November, 2008, the information has changed.

27.6 Please refer to the revised Alternatives section in the revised Draft Master EIR dated November, 2008, Figure VI-1 of revised EIR, Page VI-5 shows the airport within existing city limits. This figure will be revised to exclude the property around the airport that was not incorporated into the City limits; please refer to the errata sheet, item 6, and the revised figures. All of the figures in the General Plan Update will be revised to show the correct City boundaries.

27.7 Please refer to the revised Alternatives section in the revised Draft Master EIR dated November, 2008, the information has changed.

27.8 Please refer to the revised Alternatives section in the revised Draft Master EIR dated November, 2008, the information has changed.

27.9 Please refer to the revised Alternatives section in the revised Draft Master EIR dated November, 2008, the information has changed.

27.10 Please refer to the revised alternatives analysis discussion in the November 2008 Draft EIR.

27.11 Please refer to the revised alternatives analysis discussion in the November 2008 Draft EIR.

27.12 Please refer to response 6.13 and 6.14 above regarding the changes in calculating employees per acre.

27.13 Comment noted; however, the City determined that it wished to increase the area of the SOI and AOI as part of the General Plan Update; the revised Draft Master EIR addresses the increased area that was evaluated in the increased build-out alternative. The City is

updating its Housing Element and the issue of jobs/housing balance will be reviewed at that time, as a subsequent project under the Master EIR.



Fresno Local Agency Formation Commission

September 17, 2007

Morro Group
Attn: Mary B. Reents
1422 Monterey Street, Suite C200
San Luis Obispo, CA 93401

Dear Ms. Reents:

Subject: City of Coalinga General Plan Update 2025 and Draft Master Environmental Impact Report Addendum

We have reviewed the City of Coalinga's General Plan Update 2025, Draft Master Environmental Impact Report – Increased Buildout Alternative and offer the following comments:

1. The added Increased Buildout Alternative would result in the development of an additional 912 acres, increasing "the SOI from 5,800 acres to approximately 6,741 acres." This listed acreage is not consistent with the General Plan's Table 2-1, which states the area encompassed by the City limits includes 4,541 acres and the proposed sphere includes an additional 6,271 acres, totaling 10,811. Including the additional 912 acres would increase the total area encompassed by the City's boundary and SOI boundary to 11,723. **28.1**

   Further, as indicated in our letter dated September 10, 2007, LAFCo records indicate the City's current City limits encompass 3,812 acres and the SOI encompasses 5,514 acres. The discrepancies between these different figures should be resolved before completing the General Plan and Draft MEIR.

2. As described in the Increased Buildout Alternative, the City's potential future population has increased to up to 77,165 (Table VI-4) should the SOI reach its maximum buildout potential. As indicated in LAFCo's September 10, 2007 letter, the Draft MEIR indicates that during multiple dry years, the City's water allotment could be reduced to half of its historical average. This reduced allotment can not support the City's current population based on current usage rates of .47 acre feet/person, much less the significantly increased population identified in the Increased Buildout Alternative. The Draft MEIR concludes *"...for planning purposes it is advisable to determine the water supply based on a full reduction scenario."* Absent an increase in the availability of water, the Increased Buildout Alternative would further exacerbate an already tenuous situation. **28.2**

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Morro Group
Page 2 of 3

3. Page VI-19 states that this Alternative would "*result in an approximately 340 acre area of agricultural land being entirely surrounded by urban development.*" Despite proposed General Plan policies (LU7-1 to LU7-2) which state development proposals will be required to address potential conflicts with neighboring farming operations, it appears that there would be an inherent conflict between agricultural lands and developed properties which are proposed to surround them regardless of implementation of mitigation measures such as enactment of a Right-to-Farm ordinance. **28.3**

4. As identified on page VI-19, the proposed Alternative creates a "*leapfrog scenario*" which directly conflicts with the City's proposed General Plan Policy LU1-5.7. This Policy states, "*Development proposal involving annexation requests shall be required to be contiguous to existing development and/or demonstrate appropriateness of siting to ensure that premature or 'leapfrog' development is avoided.*" It would be inconsistent for the City to adopt this Alternative while simultaneously adopting General Plan Policies in direct conflict with the Alternative. **28.4**

   Further, The Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000 clearly states that one of LAFCo's main purposes is to promote efficient and orderly development. Government Code Section 56300 states, "*It is the intent of the Legislature that each commission… shall establish written policies and procedures… that encourages and provides planned, well-ordered, efficient urban development patterns….*" Section 56301 states, "*Among the purposes of a commission are discouraging urban sprawl, preserving open-space and prime agricultural lands, efficiently providing government services, and encouraging the orderly formation and development of local agencies….*" Fresno LAFCo's policies mirror the requirements of the Government Code. The proposed Alternative as described above is clearly inconsistent with Fresno LAFCo's State mandated purpose and its policies. If presented with a request to amend the City's Sphere of Influence as proposed, the Commission's decision may not be favorable to the City.

5. We note that our original comments did not include discussion of General Plan Land Use Element Policy LU7-2 and Implementation Measure LU7-2.1. Fresno LAFCo wishes to commend the City for inclusion of this Policy and its Implementation Measure, which require granting of a farmland conservation easement at a 1:1 ratio for each acre of farmland developed for other uses, or payment of an in lieu fee for purchase of such easements. We encourage all cities within the County to consider inclusion of such policies and implementation measures in their respective General Plans, and further encourage consideration of policies that would require farmland conservation easements at level even greater than a 1:1 ratio. **28.5**

Thank you for the opportunity to comment on this proposed Alternative. We look forward to receiving the final versions of the MEIR and Coalinga's Updated General Plan. If you have any questions, please contact me at (559) 495-0604.

Sincerely,

Darrel S. Schmidt

Darrel Schmidt, Deputy Executive Officer
Fresno LAFCo

C: Steve Julian, City Manager, City of Coalinga
Bill Skinner, Valley Planning Associates
Alan Weaver, Director, Fresno County Department of Public Works and Planning
Bernard Jimenez, Manager, Fresno County Development Services Division

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3. Fresno Local Agency Formation Commission

28.1 Please refer to responses to the December 11, 2008, LAFCO comment letter.

28.2 Comment noted that LAFCO concurs that there is a water shortage and that build out could further exacerbate an already serious water shortage. The City has implemented a water conservation ordinance that describes measures to be taken to reduce water consumption. This ordinance is available by contacting the Coalinga Public Works Department at the address given in the Introduction chapter of this EIR.

28.3 Comment noted that having agricultural area surrounded by urban development would put undue pressure on agricultural land to change land uses. Note that Coalinga is surrounded by agricultural land, and the City has included a 1:1 agricultural and replacement policy as part of the General Plan Update.

28.4 See also response to December 11, 2008 comment number 13.

28.5 Please refer to December 11, 2008 response to number 14.

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September 21, 2007

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Via Email and First Class Mail

Mr. Bill Skinner
Community Development Director
City of Coalinga
c/o Mary Reents
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Re: Comments on the Added Alternative (the "**Fourth Alternative**") to the Draft Master EIR for the Coalinga General Plan Update

Dear Mr. Skinner and Ms. Reents:

Thank you for the opportunity to review and comment on the Fourth Alternative, as set forth in that certain Memorandum dated August 27, 2007, regarding Significant New Information-Additional Alternative- Draft Master EIR, Coalinga General Plan Update. On behalf of my client, Los Gatos Creek Estates, LLC, following please find our comments on the Fourth Alternative:

1. Alternative Description: As the Fourth Alternative project proponent, we would like to see the Alternative Description revised to reflect the full scope and benefits of the Fourth Alternative. The Fourth Alternative, which is intended to add approximately 1,280 developed acres to the proposed Sphere of Influence, includes the proposed construction of approximately 4,500 residences (low, medium and high density, as well as, Equestrian Estates), a possible golf course (covering approximately 293 acres), two new school sites (totaling approximately 30 acres), and over 90 acres of recreational opportunities including linear parks, pocket parks and open space. **29.1**

2. Land Use, Population, and Housing: Although it is true that the Fourth Alternative results in an approximately 340 acre area of agricultural land being entirely surrounded by residential development, the property proposed for development in the Fourth Alternative, which we commonly refer to as a portion of the Los Gatos Creek Estates property, is proposed as low density residential development with the possibility of a golf course. In other words, the project proponent has made efforts to minimize impacts to the agricultural island resulting from the Fourth Alternative. Additionally, we do not believe that the agricultural island resulting from the Fourth Alternative should be classified as resulting in a "leapfrog" scenario. The Fourth

29.1 (cont'd)

Alternative adds property to the proposed Sphere of Influence which is bordered by the existing City limits to the east along Highway 33 and the proposed Sphere of Influence at the north side of that portion of the Los Gatos Creek Estates project included in the GP Update. In other words, the Fourth Alternative appears to create a more natural City limit in that the property added to the Sphere of Influence negates the present narrow peninsula running adjacent to and east of Highway 33. The fact that an agricultural island, which could be designated as Open Space or Urban Reserve, results from inclusion of the property included in the Fourth Alternative is irrelevant when viewed in light of existing City limits and the project proposed by the GP Update.

3. Public Services: The Fourth Alternative would provide for over 90 acres of recreational opportunities including school parks, linear parks, pocket parks and open space. Combined with the approximately 30 acres of property which would be used for new schools, the Fourth Alternative more than exceeds the goals of the Recreational Facilities mitigation measures set forth in the Master EIR. Instead of providing 2.5 acres of park for every 1000 residences, the property identified in the Fourth Alternative would provide approximately 20 acres of park for every 1000 new residences. These new parks, including the school play yards, will offer playfields for practice and competitive sports, and can be designed to meet the needs of children, the elderly and the disabled population.

   There is also the possibility that the developer, if feasible, will provide for construction of a new wastewater treatment plant within the boundaries of the Los Gatos Creek Estates project, which wastewater treatment plant would serve all of the residents within the Los Gatos Creek Estates and Villages of Los Gatos Creek project areas and provide reclaimed and/or recycled water which could be used to water the possible golf course. If constructed, this wastewater treatment plant would lessen the demand on the existing wastewater treatment plant the City presently operates and the proposed wastewater treatment plant the City is in the process of designing and constructing. Not only would residents within the Los Gatos Creek Estates project have a dedicated wastewater treatment plant, but the possible golf course could use the recycled/reclaimed water to irrigate the golf course grounds, and possibly other public and private parks within the Los Gatos Creek Estates and Villages of Los Gatos Creek project areas. As a result, the impact from the Fourth Alternative, as well as, the entire Los Gatos Creek Estates and the Villages of Los Gatos Creek projects, on the proposed wastewater treatment facility could be significantly decreased, thereby creating a more environmentally friendly alternative to that proposed by the project described in the GP Update and the Master EIR.

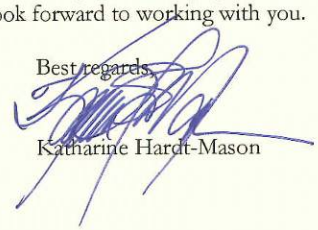
4. Aesthetic Resources: Despite the increase in population proposed by the Fourth Alternative, it is our belief that there are no new aesthetic impacts resulting from this Alternative. The view sheds in and around Coalinga are generally considered to be to the south (Kettleman and Kreyenhagen Hills) and the west (Alcade and Jacalitos Hills). The views to the north and east (Guijarral Hills), are generally considered to be less attractive. The Fourth Alternative will not block the views to the south or west as no existing or new development is proposed east or north of the Fourth Alternative project area, and the views to the east and north can, and are intended to,

be protected to some degree by inclusion of low density housing and Equestrian Estates along Highway 33. In other words, the Fourth Alternative will not block the existing view shed and will likely enhance the rural character of the community by providing for new low density residences and Equestrian Estates along the gateway into the City center. Traveling from the north into the City, one will pass several large Equestrian Estates followed by smaller Equestrian estates and low density residences, before coming to medium and high density residences immediately before entering the downtown corridor. For the foregoing reasons, we believe it to be inappropriate to identify the impacts on aesthetics as being more significant than those identified in the Master EIR. To the contrary, the proposed plan for the Fourth Alternative property is likely to reduce these impacts by creating a more harmonious flow from ranchland into urban city.

29.1 (cont'd)

As always, please do not hesitate to contact me if you have any questions or require further information regarding any of the foregoing. We look forward to working with you.

Best regards,



Katharine Hardt-Mason

cc: Glenn M. Pace
James Pace
David Pace
Michael Hitchcock
Jeff Chaung

4. McPharlin Sprinkles & Thomas LLP

29.1 This letter is no longer applicable. Comment noted with regard to the fourth alternative. The current draft GPU and EIR have included the Los Gatos Estates area within the SOI.

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October 1, 2007

Via Email and First Class Mail

Mr. Bill Skinner
Community Development Director
City of Coalinga
c/o Mary Reents
Morro Group, Inc.
1442 Monterey Street, Suite C200
San Luis Obispo, CA 93401

Re: Comments on the City of Coalinga General Plan Update 2005-2025 (the **"GP Update"**)

Dear Mr. Skinner and Ms. Reents:

Thank you for the opportunity to review and comment on the City of Coalinga General Plan Update 2005-2025. On behalf of my clients, Los Gatos Creek Estates, LLC, and Warthan Heights, LLC, following please find our comments on the GP Update: 30.1

1. Page 2-37: Implementation Measure LU1-1.5 states, among other things, that "These guidelines should promote urban design features that provide artful integration of building sites with the environment emphasizing… large building setbacks". Large building setbacks, however, tend to be less pedestrian friendly and often result in large swaths of green vegetation, contrary to the desired water conservation and xeriscaping goals set forth in the Coalinga 2025 General Plan Update Environmental Impact Report. While large setbacks may be appropriate for Residential Ranchette and/or Residential Estate, the City should consider striking this goal from this Implementation Measure as it may result in undesired outcomes. 30.2
2. Page 2-38: Implementation Measure LU1-1.10 states that "New development proposal shall be located within the existing City limits to the maximum extent feasible to prevent sprawl and premature annexations of SOI Land". While growth within the City limits may be desired and sought after as a goal, this Implementation Measure suggests and supports the proposition that build out anywhere outside of

the present City limits will be discouraged and could be prohibited based on this policy until such time as there is no land available within the City limits to be developed. In other words, even if land within the City limits is not available for development and/or land outside the City limits but in the Sphere of Influence is better situated for growth, this Implementation Measure could be used against development necessary to meet the population demands of the City. As an alternative, this Implementation Measure could be drafted to read "New development proposals shall be considered in light of the growth demands and infrastructure availability at the time the proposal is made, with preference being made to develop from the core of the city to the outer limits of the SOI land." **30.2 (cont'd)**

3. Page 2-43: Implementation Measure LU2-2.2 states that the "use of soundwalls is discouraged, and should only be used if other techniques are proved infeasible or inadequate". Implementation Measures N1-1.5 and N1-1.7, however, both suggest that soundwalls may and should be used to "shield noise-sensitive areas from excessive noise" and to "reduce noise generated by building equipment". Given the likelihood that development will be constructed close to or adjacent to major streets, existing agricultural and industrial operations, and new noise generating facilities and/or activities, the use of soundwalls should not be discouraged, but rather properly designed, installed, and aesthetically pleasing soundwalls should be encouraged. **30.3**

4. Figure 3-2: Figure 3-2 is intended to identify all property subject to Williamson Land Contracts and Contracts for which Notices of Non-Renewal have been recorded. The property under contract by my clients, commonly referred to as the "Phelps" project, including that portion of the Phelps project shown on Figure 3-2 outside of the Sphere of Influence, is all presently subject to Williamson Land Contract and Notices of Non-Renewal have been recorded against all of these properties. Copies of the Notices of Non-Renewal are available upon receipt. Figure 3-2 should be revised to reflect Notices of Non-Renewal being recorded against all of these properties. **30.4**

5. Page 3-20: Implementation Measure OSC 1-4.2 requires a minimum 100-foot setback from those natural watercourses such as los Gatos, Zapato Chino, Jacalitos and Warthan Creek. The benchmark from which the 100-foot setback is marked, however, is not established by this Implementation Measure. This Implementation Measure should be revised to provide for the 100-foot setback to be measured from the top of bank, the benchmark used by most government agencies in determining setbacks. **30.5**

6. Page 5-40: Implementation Measure AQ4-1.1 states that new development will be required to reduce short-term emissions during construction by implementing the conditions on new major developments in accordance with Table 5-8. Many of the Mitigation Measures set forth in Table 5-8, however, are not only impracticable today, but some are likely to remain impossible given the technology likely available in the future. For example, electrically driven construction equipment is not presently, and may not ever be, available for the type of work mandated by a large scale development. For that reason, Implementation Measure AQ4-1.1 should be revised to state that new development <u>will be encouraged</u> to reduce short-term emissions during construction by implementing conditions on major new development projects to the extent feasible in accordance with Table 5-8. **30.6**

7. Page 5-40: Implementation Measure AQ4-1.2 requires developers to implement post construction mitigation measures to reduce long-term operational emissions in accordance with Table 5-9. Like Table 5-8, however, Table 5-9 includes many goals which are both impracticable and impossible given the technology available today and the housing market demands. While compressed work weeks and home-based telecommuting programs may be desirable goals, they are not practical in all sectors of employment and could reduce the overall goal of expanding and bringing new industry to the City. Implementation Measure AQ4-1.2 should also be revised to show that it is the goal to implement many of the mitigation measures set forth in Table 5-9, but not a requirement of development. **30.7**

8. Page 5-46: Policy N1-3 and Implementation Measure LU2-2.2 both suggest that sound attenuation walls shall be discouraged. The overall goal of the City is to protect sensitive noise receptors from building, traffic and other noises that arise as the result of development. Thus, rather than discouraging use of all sound attenuation walls, we suggest encouragement of soundwalls that are properly designed, installed, and aesthetically pleasing. **30.8**

9. Page 6-18: Implementation Measures PFS6-3.1 states that new zoning code development standards should be established which "require neighborhood and community parks to include playfields or activities such as baseball, softball, soccer and football as well as picnic areas". Although we generally concur with these goals, if such a standard was developed, it could result in alternative and equally active park purposes might not be incorporated and included in development. Passive park activities (such as watching birds, dogs, and other animals while sitting on a park bench) and low impact activities (such as bocce ball and flying kites), which generally attract young children, the elderly and the disabled, might not be constructed, thereby resulting in a disproportional impact on these segments of the community. Rather than requiring the construction of facilities to accommodate such active pastimes, the City should consider "encouraging" development of such facilities, a long with other facilities to serve the wide range of community needs. **30.9**

10. Page 6-20: Implementation Measures PFS8-2.4 states that new development should be required to xeriscape to the maximum extent feasible. Rather than a subjective standard such as "feasible", we suggest use of a more objective standard. Developers should be required to xeriscape to the extent "practical", which provides for consideration of factors outside of the developers control, and quite likely in the best interest of the long term viability of the landscaping. **30.10**

11. Chapter 7: On behalf of my clients, we reserve the right to comment on the Implementation Plan to be prepared following the public review process and before adoption of the General Plan by the City Council. **30.11**

As always, please do not hesitate to contact me if you have any questions or require further information regarding any of the foregoing. We look forward to working with you.

Best regards,

Katharine Hardt-Mason

cc: Glenn M. Pace
James Pace
David Pace
Michael Hitchcock
Jeff Chaung

5. McPharlin Sprinkles & Thomas LLP (Comments on General Plan Update 2025)

30.1 Thank you for your comments. Comment noted that you represent Los Gatos Creek Estates, LLC and Warthan Heights, LLC.

30.2 Please refer to the revised implementation measure LU1-1.5 in the November 2008 Draft MEIR. Regarding LU1-1.10, the intent of this measure is to encourage development within the city limits before developing outside the city limits. Please note that nothing will be developed outside the city limits until an adequate water supply is found. Also note that your recommended language will be supplied to City Council for consideration.

30.3 Please refer to response 9.14 to the Wellington Corporation comment letter. Please note that there are some instances where sound walls are necessary to reduce traffic noise along major arterials.

30.4 Comment noted regarding notice of non-renewal regarding the Phelps property. Figure 3-2 has been amended to reflect non-renewal properties.

30.5 Comment noted. EIR has changed language to the following language, "measure from top of bank or outside edge of riparian canopy." This regulation is consistent with the California Department of Fish and Game regulations.

30.6 Comment noted with regard to Air Quality measures. Please refer to responses to your recent letter with regards to AB32 and SB375.

30.7 Comment noted regarding A4-1.2; the source of table 5-9 is the SJVAPCD and as such will be a requirement of development. The EIR preparer recognizes that this table will be updated with changing regulations such as AB32 and SB375 and any other requirements set forth by SJVAPCD.

30.8 Please refer to new implementation measure n1-1.3 which requires acoustical analysis.

30.9 Comment noted regarding restriction of PFS6-3.1 that requires neighborhood and community parks to include active recreation. The EIR preparer will encourage the City to strike neighborhood parks from this requirement.

30.10 Please refer to the new language in this mitigation measure. Water is scarce and the state is in a severe drought. Note that the only way the city will be able to allow development is if the development can show significant reduction in water usage. Therefore, out of necessity, drought tolerant and waterless landscaping will become the only viable form of landscaping.

30.11 Comment noted regarding your right to comment. We appreciate the time that you have taken to comment on the EIR and General Plan Update.

D. APRIL 2009 FINAL MEIR COMMENT LETTERS AND RESPONSES

The following member of the public has prepared comments on the proposed FEIR, distributed in April, 2009. These comments were read into the record at the April 28, 2009 Planning Commission Hearing and submitted in letter form at the May 7, 2009 City Council Meeting.

General Public and Private Organizations		Page
Los Gatos Creek Estates, LLC Letter of May 4, 2009	18640 Sutter Blvd., Suite 100 Morgan Hill, CA 95037 Contact: Michael Mitchcock, Director of Community Planning	X-134

The letter of comment is given with the responses following the letter. The letter of comment is reproduced in total, and numerical annotation has been added to delineate and reference the response to those comments.

THE VILLAGES OF
LOS GATOS CREEK

Los Gatos Creek Estates, LLC
408-782-1669 fax 408-782-1662
18640 Sutter Blvd., Suite 100
Morgan Hill, CA 95037

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May 4, 2009

Mr. Bill Skinner, City Manager
City of Coalinga
155 W. Durian
Coalinga, CA 93210

RE: Comments on General Plan Update and MEIR as Submitted to the Planning Commission on April 28, 2009

31.1

Dear Bill,

As requested, we have summarized the General Plan Update comments presented at the Planning Commission hearing of April 28, 2009. The comments consisted of four major points as described below.

1. New Development Location (Implementation Measure LU1-1.10, page 2-40): "New development proposals shall be located within the existing City limits to the maximum extent feasible to prevent sprawl and premature annexations of SOI lands."

   This implementation measure should be revised to be consistent with the 1) proposed land plan that shows substantial development outside the existing City limits and 2) Implementation Measure LU1-5.7 that requires annexation requests to be contiguous or otherwise appropriate to avoid premature development.

   We suggest the following revision to the implementation measure:

   > New development proposals ~~shall~~ should be located within or adjacent to the ~~existing~~ City limits to provide for orderly expansion of the City ~~the maximum extent feasible to prevent sprawl and premature annexations of SOI lands~~.

2. Agricultural Land Mitigation (Implementation Measure LU7-2.1, page 2-50 to 2-52): It will be very difficult and cost prohibitive for a developer to acquire conservation easements at a 1:1 ratio for each acre developed. This would add significantly to the upfront costs of initiating a project that could in turn make the project economically infeasible when added to the other fees and infrastructure improvements costs required by the City.

   A more cost effective approach rather than purchasing large swathes of agricultural easements on land that may never be developed in any case, would be to focus attention on properties that would form a permanent urban/rural boundary for the City. A much lower ratio may then be sufficient for mitigation.

Page 2

The timing of payment of in lieu fees would be more feasible if it were stages such as certificate of occupancy and escrow where more financing is available to the applicant.

31.1

We suggest the following revisions to the implementation measure:

Implementation Measure LU7-2.1
Development projects shall be required to mitigate for loss of farmland by either (1) granting a farmland conservation easement to or for the benefit of the City and/or a qualifying entity approved by the City, at a 1:1 ratio for each acre developed or an equivalent as specified in a development agreement between the project applicant and the City, or (2) by payment of an in lieu fee as established by the City, which shall be reviewed and adjusted periodically to ensure that the fee is adequate to offset the cost of purchasing farmland conservation easements at a 1:1 ratio or a proportionate share of an agricultural buffer zone around the City's planned growth area or, (3) as determined by LAFCO and/or the Department of Conservation.

The City shall prepare Agricultural Conservation Guidelines identifying requirements for conservation easements, including timing of conservation easements, location of land to be preserved, including an agricultural buffer zone around the City's planned growth area, land mitigation ratio and quality and minimum standards for conservation easements.

The Agricultural Conservation Guidelines would include the following elements:

A. Timing of Conservation Easements

Direct acquisition of conservation easements by a project applicant shall occur on or before the issuance of certificates of occupancy for the Project or as specified in a development agreement between the project applicant and the City~~grading permits~~. ~~This approach requires that~~ These conservation easements shall be acquired for the benefit of the City ~~as farmland is actually converted at the project site~~. Preservation of off-site farmland may be done for the entire project at one time, ~~prior to the City's approval of the project's first grading permit.~~ or, alternatively, ~~preservation~~ may be done in increments with the build-out of the Project as specified in a development agreement with the City~~amount~~, ~~with preservation occurring prior to issuance of each grading permit.~~

B. Location of Land to be Preserved
The farmland to be preserved through this program shall be located in Pleasant Valley, in proximity to the land being impacted, and on similar soil types, to the extent feasible, or in an agricultural buffer zone around the City's planned growth area. Those lands directly north and south of the City's SOI, identified as Prime in Figure 3-2 (presented in the Open Space and Conservation Element of this General Plan), would meet this requirement and should be considered ideal candidates for farmland mitigation sites.

Page 3

C. Land Mitigation Ratio and Quality
The ratio of farmland to be preserved to farmland developed at the project site shall be a 1:1 ratio or an equivalent as specified in a development agreement between the project applicant and the City. Easements obtained by the Project Applicant must preserve either Farmland of Statewide Importance or Prime Farmland, or be within an agricultural buffer zone around the City's planned growth area.

D. Minimum Standards for Conservation Easements
While the specific terms of each individual conservation easement necessarily vary, the following standards must be met before the City will accept any easement as mitigation:
a) If the land to be developed is designated as Farmland of Statewide Importance, so the conservation easement(s) acquired shall preserve either Farmland of Statewide Importance or Prime Farmland, or be within an agricultural buffer zone around the City's planned growth area. .
b) All owners of the agricultural mitigation land shall execute the document encumbering the land.
c) The document shall be recordable and contain an accurate legal description of the agricultural mitigation land.
d) The document shall prohibit any activity which substantially impairs or diminishes the agricultural productivity of the land.
e) The document shall protect any existing water rights necessary to maintain agricultural uses on the land covered by the document, and retain such water rights for ongoing use on the agricultural mitigation land.
f) The Applicant shall pay to the City an agricultural mitigation monitoring fee to cover the costs of administering, monitoring and enforcing the document in an amount determined by the receiving entity, not to exceed 10% of the easement price paid by the applicant, or a different amount approved by the City Council not to exceed 15% of the easement price paid by the applicant.
g) The City shall be named a beneficiary under any document conveying the interest in the agricultural mitigation land to an entity acceptable to the City.
h) Interests in agricultural mitigation land shall be held in trust by an entity acceptable to the City and/or the City in perpetuity. The entity shall not sell, lease, or convey any interest in agricultural mitigation land which it shall acquire without the prior written approval of the City.
i) If any qualifying entity owning an interest in agricultural mitigation land ceases to exist, the duty to hold, administer, monitor and enforce the interest shall be transferred to another entity acceptable to the City or to the City.

E. In Lieu Fees
In lieu fees for the conservation of farmland shall be paid to the City and/or qualifying entity approved by the City prior to or upon close of escrow of development (for each residential structure and each commercial, office, and industrial building) within the Project~~approval of grading permits~~. The City's continuing consultations with conservation agencies and organizations, as well as an assessment of the geographic area will suggest a reasonable current market value for any agricultural land conservation easement. ~~Fees will be collected on or before the issuance of grading~~

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Page 4

~~permits~~. The applicant may also pay the ~~entire~~ in lieu fees as specified in a development agreement with the City~~amount prior to issuance of the first grading permit~~.

3. Development within 100 Year Floodplain (Implementation Measure S2-3.2, Page 5-34 and Implementation measure S3-1.4, Page 5-36): The first implementation measure S2-3.2 allows development within the FEMA identified 100 year flood plain only if the flood maps are revised by FEMA due to flood control improvements or base elevations are raised to protect new development from flooding. The second implementation measure S3-1.4 states "Require new development to avoid building in the 100 year floodplain to the extent feasible. Locating structures/facilities in the 100 year floodplain shall be discouraged." This raises an inconsistency between the two measures, as development is allowed in the 100 year flood plain under certain specified conditions in the first measure while it is discouraged across the board in the second measure.

   We request that the language of the implementation measures be revised to be consistent with the land use plan which allows development within the flood plain providing flood control improvements are made or base elevations are raised to protect new development from flooding as acknowledged by FEMA.

31.1

4. Five Year Phasing Plan, Final MEIR, Errata Sheet, #30 and Figure V.H-2, Pages II-13 and II-14: Figure V.H.-2 Potential Phasing Map shows areas with projected phasing dates in 5 year increments. We request that this map be revised to be consistent with applications in progress, and that the Villages of Los Gatos Creek be designated for development ~~by~~ prior to 2015.

   In addition, we request that the text proposed in the Errata for ***Residential*** be revised to be consistent with the Phasing Map and that all dates be set for when development is to occur by, e.g. "one area is recommended for development ~~by~~ prior to the year 2015, and the other four areas are recommended for ~~consideration~~ development ~~by~~ prior to year 2020."

   It will also be necessary to adjust associated buildout tables and infrastructure demand to correspond to the revisions in phasing.

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Please contact me if you desire further clarification or have any questions.

Sincerely,

Michael Hitchcock
Director of Community Planning

1.

Los Gatos Creek Estates, LLC

31.1 The City Council directed staff to incorporate the changes requested in this letter. Changes have been made to the Land Use Element and Master EIR.

XI. ERRATA SHEET

A. LIST OF CHANGES TO THE DRAFT MEIR, DATED NOVEMBER 2008

1. II.C.1 on page II-1. Change last sentence to read "Buildout of the proposed General Plan would increase the city's population from approximately 11,217 residents to approximately 55,373 residents in the year 2025."

2. Table II-1 on page II-3, column 1, change the numbers shown below in red in red:

   AG Impact 1 – Implementation of the proposed General Plan would convert approximately 5,111 acres of Prime Farmland and 1,009 acres of Farmland of Statewide Importance to non agricultural use.

3. First paragraph of section III.B. on page III-1. Add last sentence reading "Based on the proposed General Plan the City's project objective is to plan the community for a population of approximately 55,373 by the year 2025 and to amend the City's SOI to accommodate that growth."

4. III.C.1.a. on page III-5, second paragraph. Change third sentence to read "Using that table, the maximum population of Coalinga at buildout of the General Plan would be approximately 81,240 (refer to Table 2-9 of the General Plan Update on page 2-37 of the General Plan Update)."

5. III.C.1.a. on page III-5, second paragraph. Change sixth sentence to read "Given the existing population, these proposals, which could add approximately 38,670 residents to the population (General Plan, Table 2-4), and the environmental constraints, it seems reasonable that the population could reach approximately 55,373 by the year 2025."

6. Make changes shown in red italics in the following tables found on page III-6:

TABLE III-1
Land Use Diagram Approximate Acreages*

Land Use	City Limits	SOI	Total
Residential Ranchette	0	523	523
Residential Estate	30	*464*	*494*
Residential Single-Family	681	2,393	3,074
Residential Multi-Family – Medium Density	171	168	339
Residential High Density	168	31	199
Mixed Use	41	0	41
Commercial General	96	70	166
Commercial Service	99	89	188
Manufacturing/Business	299	1,375	1,674
Public Facilities	*1,894*	456	2,351

Land Use	City Limits	SOI	Total
Recreation	145	660	805
Open Space/Conservation	286	958	1,244
Agriculture	95	243	338
Subtotal	4,005	*7,430*	*11,436*
Streets right-of-way	536	460	997
Total	4,541	*7,890*	*12,433*

Table III-2
Projected Population by Year

Year	Population
2005	*11,217*
2010	*22,256*
2015	*33,295*
2020	*44,334*
2025	*55,373*

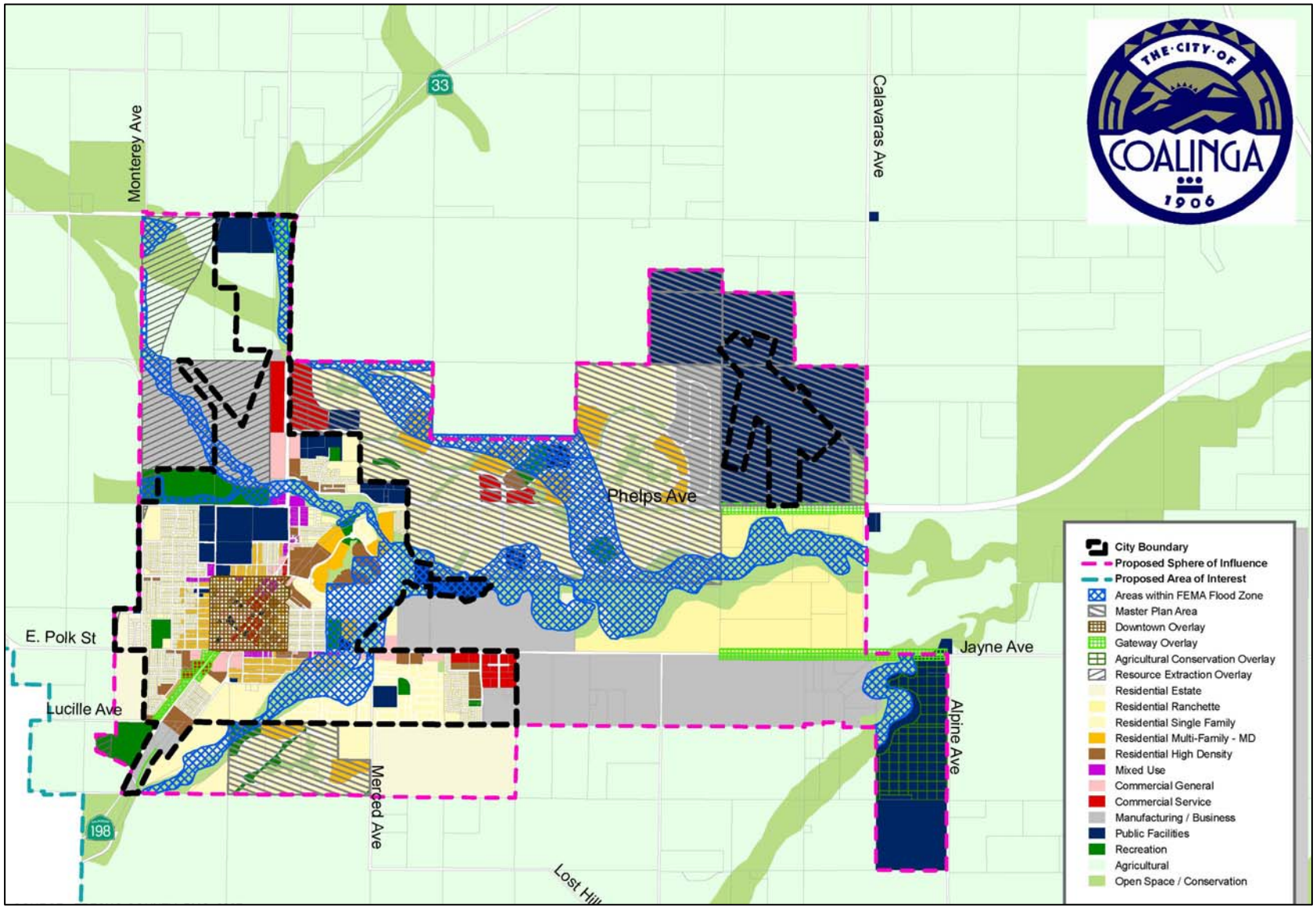
7. Make changes to Table III-3 as follows:

TABLE III-3
Planning Boundaries in Acres (approximate)

Planning Area	Current	Proposed
City Limits	*3,812*	*3,812*
Sphere of Influence	2,288	*8,620*
Total Planning Area	*6,100*	12,432
Area of Interest	11,581	41,146
TOTAL	*17,681*	53,579

Source: City of Coalinga General Plan Update 2025

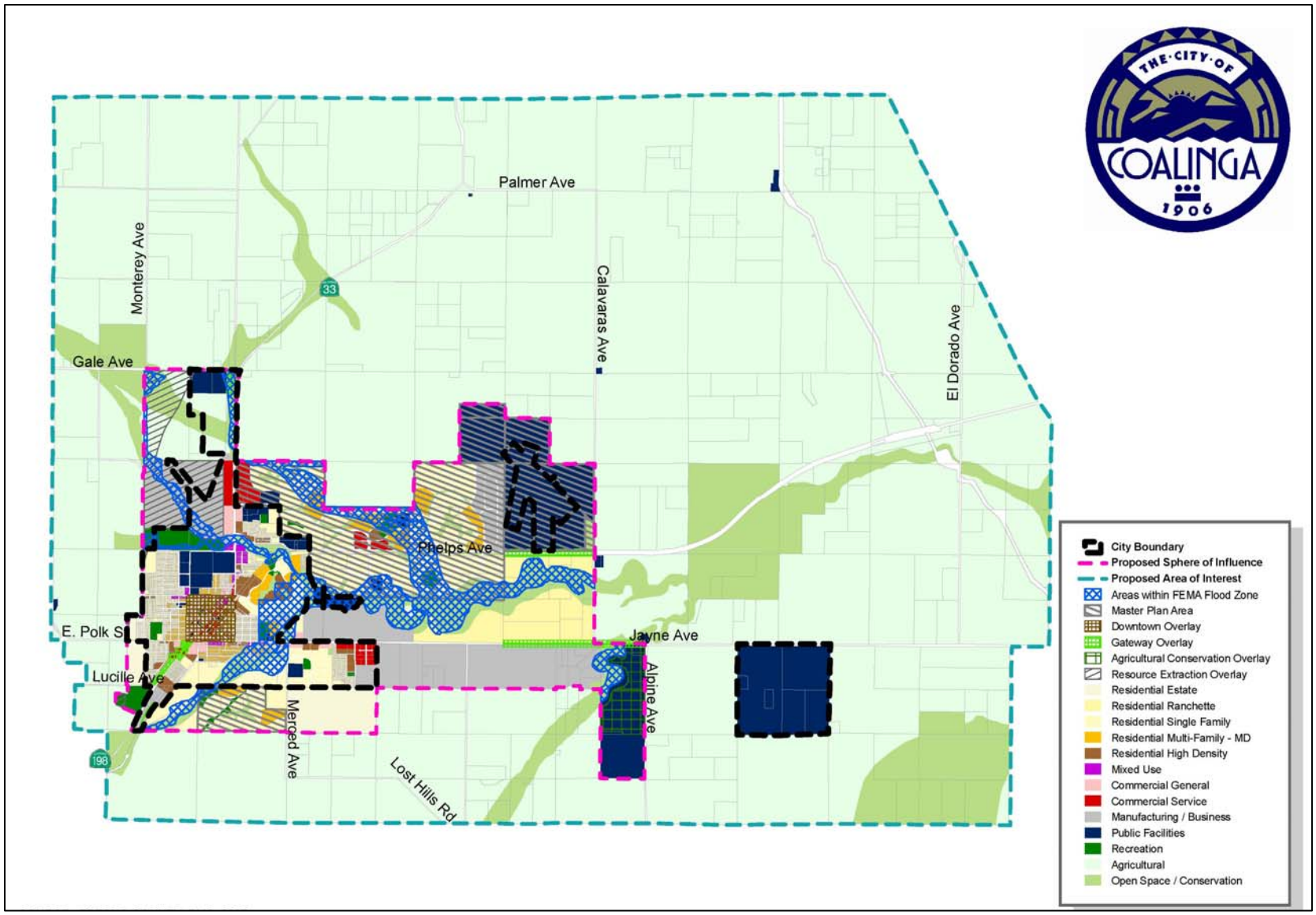
8. Replace Figure III-3 and III-4 with figures found on the following pages. These figures are also Figures 2-5a and 2-5b of the General Plan Update.



Source: PMC, 2007

NORTH
Not to Scale

Proposed Land Use with AOI
FIGURE III-3



Source: PMC, 2007

NORTH
Not to Scale

Proposed Land Use
FIGURE III-4

9. V.F.1.b on pageV-55. Change the second and third paragraphs to read,

The Department of Finance population estimate for 2005 showed 11,217 people in the city of Coalinga, excluding group quarters, (PMC; Department of Finance, 2005). The 2000 DOF estimated 10,448 persons in the City in that year (Department of Finance Table E-5, 2008). The actual growth rate between 2000 and 2008 averaged 1.94 percent annually. Based on the historical growth rate and anticipated future residential development, the proposed General Plan projects that a three to five percent average annual growth rate cold be sustained over the next 20 years, which would add between 10,971 and 44,156 persons to the population. Based on this projection, the General Plan build out would occur around the year 2025 with a population of between 22,188 and 55,373 residents. Table V.F.-1, taken from the proposed General Plan, shows the estimated annual growth from 2005 to 2025 given an annual average growth of 3.5 percent.

TABLE V.F.-1
Projected Population Growth, 2005-2025

Year	Population	Annual Growth Rate
2005	11,217	3.20 percent
2006	11,576	3.20%
2007	11,946	3.40%
2008	12,353	3.40%
2009	12,773	3.60%
2010	13,232	3.60%
2011	13,709	3.80%
2012	14,230	3.80%
2013	14,770	4.00%
2014	15,361	4.00%
2015	15,976	3.80%
2016	16,583	3.80%
2017	17,213	3.60%
2018	17,833	3.60%
2019	18,474	3.40%
2020	19,103	3.20%
2021	19,714	3.00%
2022	20,305	3.00%
2023	20,914	3.00%
2024	21,542	3.00%
2025	22,188 (a 20-year increase of 10,971 persons)	
Average Annual Growth 2005-2025		3.50%

Source: PMC 2008; Department of Finance, 2005

According to the Department of Finance, Coalinga grew by 17 percent between 2000 and 2008 with an average annual growth rate of 2.13%. In the prior decade (1999-2000) the City witnessed a 2.3 percent average annual growth rate. The proposed General Plan, however, assumes that growth could exceed the historic rate as well as the Department of Finance growth projections outlined in table V.F.-1. This assumption is based on the fact that a number of housing developments are currently proposed (refer to Table V.F.-2) that would provide 12,984 housing units for an additional population of 38,670 new residents (excluding group quarters), assuming the current occupancy rate of 3.0 people per household. To account for additional growth both independent of, and in support of the currently proposed developments the General Plan Update estimates an additional 5,486 person increase in population resulting in a total General Plan buildout population objective of 55,373 in 2025. Please refer to Table III-2 that outlines the projected population growth during the tenure of the proposed General Plan given the proposed buildout population objective. Although the population objective proposed by the proposed General Plan exceeds historic growth rates, it is still well below Coalinga's maximum residential buildout potential of 81,240 as outlined in Table 2-9 of the proposed General Plan.

10. Make changes shown in red italics in the following Table V.F.-4 found on page V-63:

TABLE V.F.-4
Maximum Residential Buildout Potential in Dwelling Units (DU) per Acre

Land Use	DU's[1]	City Limits			Future Growth Area (SOI)			TOTAL		
		Acres	DU's	Pop.	Acres	DU's	Pop.	Acres	DU's	Pop.
Residential Ranchette (RR)	0.1	0	0	0	523	52	*156*	523	52	*156*
Residential Estate (RE)	2.0	30	60	180	*464*	*928*	*2,784*	*494*	*988*	*2,964*
Residential Single Family (RSF)	5.0	681	3,405	10,215	2,393	*11,960*	*35,880*	3,074	*15,365*	*46,095*
Residential Medium Density (RMD)	15.0	171	2,565	7,695	168	2,520	7,560	339	5,085	15,255
Residential High Density (RHD)	25.0	168	4,200	12,600	31	775	2,325	199	4,975	14,925
Mixed Use	15.0	41	615	1,845	0	0	0	41	615	1,845
TOTAL	N/A	1,091	10,845	32,535	3,579	16,235	*48,705*	4,670	*27,080*	*81,240*

Source: PMC, Land Use Diagram GIS layer (land_use_diagram.shp) 2008

11. Make Changes shown in red italics in the following Table V.F.-5 found on page V-64:

TABLE V.F.-5
Non-Residential Maximum Buildout Potential
(No Overlay Designation)

Land Use	City Limits		Future Growth Area (SOI)		TOTAL	
	Acres	Employees[1]	Acres*	Employees[1]	Acres	Employees[1]
CG	96	384	*70*	280	166	664
CS	99	396	89	356	188	752
MB	299	1,196	1,375	5,500	1,674	6,696
PF	1,894	7,576	456	1,824	*2,350*	9,400
REC	145	*0*	660	*0*	805	*0*
OS	286	*0*	958	*0*	*1,244*	*0*
AG	95	*49.4*	243	*126.36*	338	*175.76*
TOTAL	2,914	*9,601.4*	3,851	*8,086.36*	*6,765*	*17,687.76*

[1]Assumes 4.0 employees per acre of land for CG, CS, MB, PF, 0 employees per acre for REC and OS, and 0.52 employees per acre for AG.
[2]The 4.0 employees per acre is based on Fresno Council of Governments information used in the traffic modeling conducted in 2005.

Source: PMC, Existing Land Use Map (pmc_2006_lu_map_sp27_4.shp) March 2008

12. Make changes shown in red italics in the following Table V.F.-6 found on page V-64:

TABLE V.F.-6
Land Use Changes Within Planning Area

Land Use Designation	1994 GP*		2025 GP Update**		Acreage Increase (Decrease)	% Change
	Acres	%	Acres	%		
RR	n/a	n/a	522.48	4.20%	522.48	100%
RE	*208.26*	*3.05%*	*495.46*	3.99%	287.47	*138%*
RSF	*1,416.31*	*20.74%*	*3,073.69*	24.72%	*1,657.38*	*117%*
RMD (Low density RML)	130.44	1.91%	0.00	0.00%	*-130.44*	-100%
RMD (Medium Density RML)	*117.36*	*1.72%*	338.62	2.72%	*221.26*	*189%*
RHD	n/a	n/a	*199.34*	1.60%	*199.34*	100%
MX	*55.26*	*0.81%*	41.14	0.33%	*-14.12*	*-26%*
CG	*87.83*	*1.29%*	*166.4*	1.34%	*78.57*	*89%*
CS	*26.61*	*0.39%*	*187.98*	1.51%	*161.37*	*606%*
MB	*134.29*	*1.97%*	1,674.04	13.47%	*1,539.75*	*1,147%*
PF	*1,435.37*	*21.02%*	2,350.67	18.91%	*915.32*	*64%*

Land Use Designation	1994 GP*		2025 GP Update**		Acreage Increase (Decrease)	% Change
	Acres	%	Acres	%		
REC	*192.81*	*2.82%*	*804.18*	6.47%	*611.37*	*317%*
OS	*1,255.21*	*18.38%*	*1,244.25*	10.01%	*-10.96*	-1%
AG	*1,274.99*	*18.67%*	337.95	2.72%	*-937.04*	*-73%*
Subtotal	*6,334.74*	*92.80%*	*11,436.22*	*87.79%*	*5,101.48*	---
Street right of ways etc (estimated)	*494.48*	7.20%	*996.50*	8.01%	*501.72*	*102%*
PLANNING AREA TOTAL	*6,829.22*	*100%*	*12,432.72*	*95.80%*	*5,603.20*	---

* *Source: PMC, Existing Land Use Map GIS layer (1994_exisiting_gp_sp27_4.shp) March 2008*
** *Source: PMC, Land Use Diagram GIS layer (land_use_diagram.shp) March 2008*

13. Section V.F.5. on page V-66. Change the first paragraph to read,

> *The proposed General Plan is predicated on continued growth within the city limits and in the SOI. A number of population projections have been prepared for the City. The proposed General Plan assumes that growth could exceed the historic rate as well as the Department of Finance growth projections outlined in table V.F.-1. This assumption is based on the fact that a number of housing developments are currently proposed (refer to Table V.F.-2) that would provide 12,984 housing units for an additional population of 38,670 new residents (excluding group quarters), assuming the current occupancy rate of 3.0 people per household. To account for additional growth both independent of, and in support of the currently proposed developments, the proposed General Plan estimates an additional 5,486 person increase in population resulting in a total General Plan buildout population objective of 55,373 in 2025. Please refer to Table III-2 that outlines the projected population growth during the tenure of the proposed General Plan given the proposed buildout population objective. Although the population objective outlined by the proposed General Plan exceeds historic growth rates, and the Department of Finance estimated growth, it is still well below Coalinga's maximum residential buildout potential of 81,240 as outlined in Table 2-9 of the proposed General Plan.*

14. Section V.F.5 on page V-66, second paragraph; revise the last sentence of the second paragraph to read, "If all of the housing projects that are currently proposed are built and occupied, the total population could exceed 55,000 people excluding group quarters at buildout, over 30,000 people more than is projected by the Department of Finance."

15. Section V.G.4.on page V-76. Last sentence of first paragraph should be changed to read "Future need is based on a proposed General Plan buildout population of 55,373."

16. SectionV.G.4 on page V-76. First sentence of second paragraph should read "The proposed General Plan includes planned residential land uses to accommodate an additional 10,845 dwelling units within the existing city limits and 16,235 within the Future Growth Area (SOI) totaling an additional 27,080 dwelling units. However the Land Use Element of the

proposed General Plan estimates buildout of the proposed General Plan based on buildout of reasonably foreseeable development projects plus estimated additional annual growth resulting in the construction of approximately 14,719 additional dwelling units by the year 2025."

17. TableV.G.-2 on page V-77 shall be amended as outlined below (red highlight with italics).

TABLE V.G.-2
Public Service - Existing Conditions and Future Needs

Service	Standard	Existing Rate	Year 2025 Add'l Needs
Fire Protection	1:1000*	1:748	*44* firefighters
Police Protection	2:1000**	2:1000	*88* officers
Park Space	2.5:1000***	2.2 acres:1000	*149* acres
Schools-Elementary	Average 9.6 acres; 600 students per school****	0.49/du +	*7,212* students *12* schools *115* acres
Schools-Middle School	Average 1.9 acres; 1,000 students per school****	0.25/du++	*3,680* students *3-4* schools *5.7-7.6* acres
Schools-High School	Average 44.5 acres; 1,800 students per school****	.46/du+++	*6,771* students *3-4* high schools *133.5-178* acres

**International City/County Association Standard*
***Federal Bureau of Investigation Recommendation*
****Proposed General Plan Policy PFS6-1*
*****Ave. Students per school and acreages from www.cde.ca.gov/ls/fa/sf/facts.asp*

18. Section V.G.5.a, on page V-77. Change fourth sentence in first paragraph to read, "To maintain a similar firefighter to resident ratio as currently exists, the Fire Department will be required to hire and additional *44* firefighters

19. Section V.G.5.b.on page V-78. Change second sentence of first paragraph to read "If buildout is reached by the year 2025 as anticipated in the proposed General Plan, *88* additional officers will need to be hired to maintain the current officer to resident ratio of 2:1000."

20. Section V.G.5.c., on page V-79. Change first sentence of first paragraph to read, "Increased residential development anticipated in the proposed General Plan should generate sufficient demand for additional schools as indicated in Table V.G.-2; to meet ultimate buildout, there will be a demand for an additional *twelve* elementary schools, four middle schools and *four* large high schools."

21. Section V.G.5.d. on page V-80. Change third sentence of first paragraph to read, "To meet the standard proposed in the General Plan of 2.5 acres of park space for every 1,000

residents, the City and/or new development will have to dedicate an additional *149* acres of park space."

22. SectionV.H.5.a on page V- 90. Change the first paragraph to read:

Existing annual city demand is based on a calculated 271 gallon per capita daily (gpcd) consumption rate found in Boyle's Water System Master Plan. This is an equivalent of 0.41 afy/person. To calculate expected yearly future demand, this factor was multiplied by the anticipated population. The anticipated population projections in the Water System Master Plan do not reflect those in the proposed General Plan. The proposed General Plan anticipates a higher growth rate, with a buildout population of approximately 55,373 residents in the year 2025. The Water System Master Plan anticipated a population of 26,260 in that same year. However, for purposes of this EIR, the demand factor can still be applied to identify future demand per the General Plan scenario. Based on this factor, future "city demand" for water at buildout of proposed land uses (refer to Table 2-9 on page 2-37 of the proposed General Plan) would be approximately (81,240 x 0.41 afy), or 33,308 afy. However the city's reasonably foreseeable population or objective population for the year 2025 is 55,373 residents, putting the "city demand" at buildout at 22,703 afy. When combined with the "added demand" of 2,128 afy, the total reasonably foreseeable water demand in the Year 2025 equals 24,831 afy. Table V.H.-3 below displays anticipated water demand from the Year 2010 through 2025.

TABLE V.H.-3
Anticipated Future Water Demand in Acre-Feet per Year

Year	Projected Population	City Demand*
2010	*22,256*	*11,253*
2015	*33,295*	*15,779*
2020	*44,334*	*20,305*
2025	*55,373*	*24,831*
**Based on approximately .41 afy/per capita consumption*		

23. Section V.H.5.a. fourth paragraph on page V-92. Change fourth sentence to read, "This is well under what the General Plan envisions at 55,373 total future population by 2025."

24. Section V.H.5.b.on page V-92. Change first sentence to read, "As illustrated in Table V.H.-4, the expected wastewater demand resulting from buildout of the proposed General Plan will be approximately 4.98 (90 gpcd x 55,373) mgd.

25. TableV.H.-4 shall be amended as outlined below (red highlight with italics).

TABLE V.H.-4
Anticipated Future Wastewater Demand in Million Gallons per Day

Year	Projected Population	Projected Wastewater Flow
2010	*22,256*	*2.00*
2015	*33,295*	*3.00*
2020	*44,334*	*3.99*
2025	*55,373*	*4.98*

26. Section VII.A.1.on page VII-1. Change third paragraph to read,

The current population of Coalinga is approximately 17,801, with 11,217 in households and 5,684 persons living in group quarters. The estimated annual growth to 2025, assuming an average annual growth rate of 3.5 percent is 22,188 persons excluding group quarters (PMC; refer to Table 2-3 in the General Plan). However, the current development proposals with residential components shows a demand for housing that would serve an additional 38,670 (excluding group quarters) or a 29 percent growth in population (refer to Table 2-4, and page 2-14 in the proposed General Plan).

27. TableVI.-3 shall be amended as outlined below (red highlight with italics).

TABLE VI-2
Acreage By Land Use Category and Maximum Residential Buildout*
Alternative 2 – Reduced Buildout Alternative

Land Use	DU/Acre	City Limits			SOI			Total		
		Acres	DUs	Pop.	Acres	DUs	Pop.	Acres	DUs	Pop.
Agriculture		95			238			333		
Commercial General		96			8			104		
Commercial Service		100			85			185		
Manufacturing/Business		274			832			1,106		
Open Space		286			475			761		
Public Facilities		1,921			48			1,969		
Recreation		144			131			275		
Residential Estate	2	29	58	174	390	780	2,340	419	838	2,514
Residential High Density	25	168	4,200	12,600	9	225	675	177	4,425	13,275
Residential Medium Density	15	171	2,565	7,695	131	1,965	5,895	302	4,530	13,590
Residential Ranchette	0	0	0	0	0	0	0	0	0	0
Residential Single-Family	5	679	3,395	10,185	833	4,165	12,495	1,512	7,560	22,680
Mixed Use	15	41	615	1,845	0	0	0	41	615	1,845
Totals		4,004	10,833	32,499	3,180	7,135	21,405	7,184	17,968	53,904

**Based on maximum buildout of 81,240 shown in Table 2-9 of the General Plan*

28. VII.A.2 Remove the third bulleted item.

29. Insert the following paragraph after the first paragraph on page V-91 in section V.H.5.a:

It is likely that the buildout in the General Plan will not occur unless the City finds a water source to support increased population. The City is aware of this issue and intends to designate a phasing plan for future development based on land use within the City's Sphere of Influence. Please refer to Figure V.H.-2. However, the City is in the process of updating its Housing Element, and one issue being addressed in this update is refinement of the jobs to housing balance in the City. The EIR consultant recommends that the following phasing plan be further refined as part of the Housing Element update, and that the City consider amending the Land Use Element of the general plan, if necessary, to include the Housing Element update information when that document is completed (estimated date of completion of the Housing Element update is June 2010).

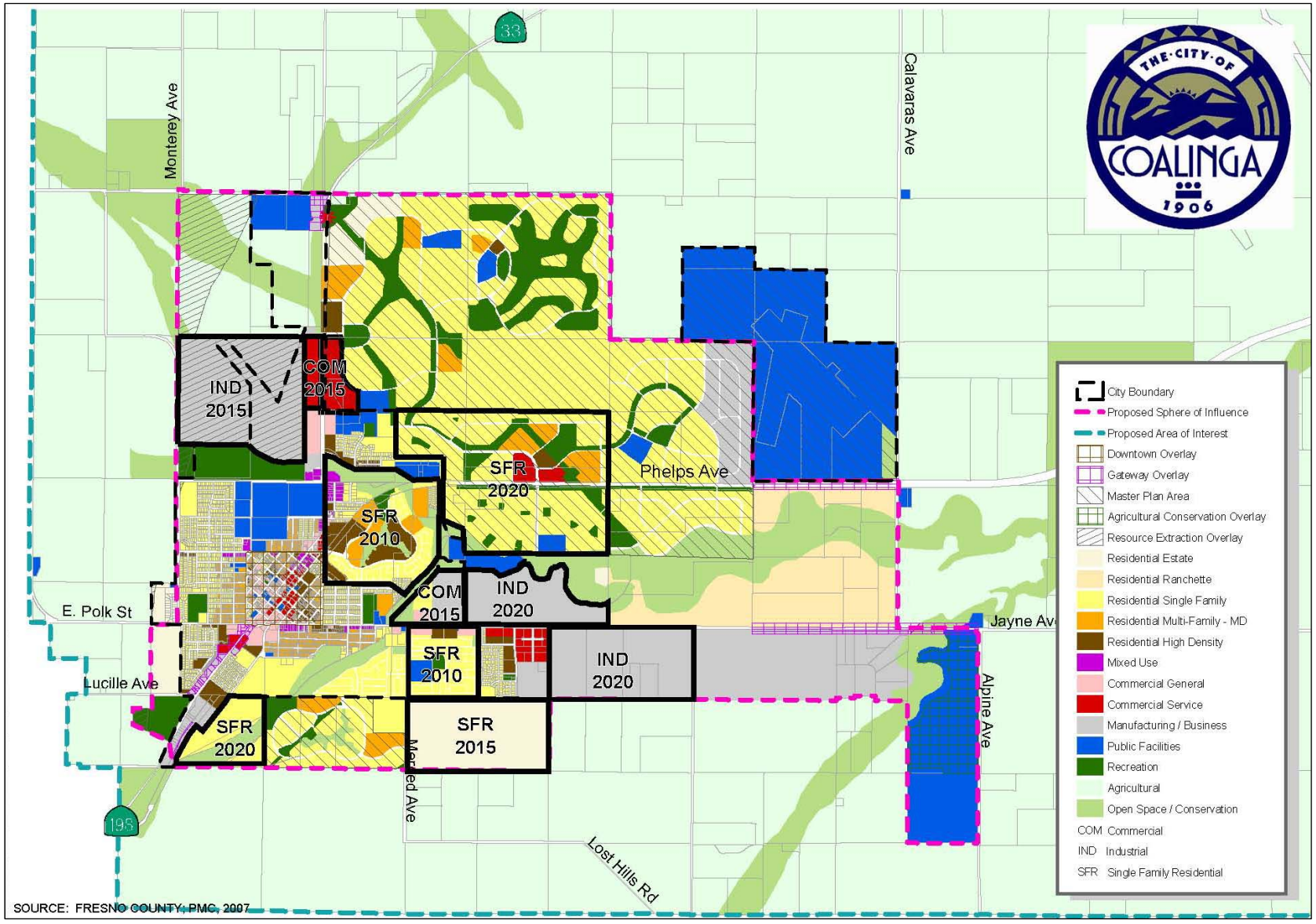
The City is contemplating a five year phasing plan on areas within the Sphere of Influence for residential, commercial and industrial development, as follows:

***Residential**: Based on Figure V.H.-2, the City has identified five areas of future residential areas: one area is recommended for development by the year 2015, and the other four areas are recommended for consideration by the year 2020. The development potential of these residential areas would be further discussed in the City's Housing Element update.*

***Commercial**: Based on Figure V.H.-2, the City has identified three areas for commercial development, and all of these areas are infill areas within the existing Sphere of Influence. The City is pursuing development of commercial properties since the City does not have enough commercial services to meet current population needs.*

***Industrial**: Based on Figure V.H.-2 contained in the errata section of this Final Master EIR, the City has identified two major areas for industrial development. Granite Construction has already indicated a need to expand the existing gravel operation and this is expected to occur before 2015. The second area, located south of Jayne Avenue is expected to occur by 2020.*

30. Insert Figure V.H.-2 between pages V-92 and V-93 of Draft EIR.



Source: PMC, 2007, City of Coaling 2009

NORTH
Not to Scale

Potential Phasing Plan
FIGURE V.H.-2

B. LIST OF CHANGES TO THE PROPOSED FINAL MEIR, DATED APRIL 2009

31. Insert The Villages of Los Gatos Creek comment letter dated May 4, 2009 in section X on page X-133 including the following:

APRIL 2009 FEIR COMMENT LETTER AND RESPONSE

The following member of the public has prepared comments on the proposed FEIR, distributed in April, 2009. These comments were read into the record at the April 28, 2009 Planning Commission Hearing and submitted in letter form at the May 7, 2009 City Council Meeting.

General Public and Private Organizations		Page
Los Gatos Creek Estates, LLC Letter of May 4, 2009	18640 Sutter Blvd., Suite 100 Morgan Hill, CA 95037 Contact: Michael Hitchcock, Director of Community Planning	X-134

The letter of comment is given with the responses following the letter. The letter of comment is reproduced in total, and numerical annotation has been added to delineate and reference the response to those comments.

THE VILLAGES OF LOS GATOS CREEK

Los Gatos Creek Estates, LLC
408-782-1669 fax 408-782-1662
18640 Sutter Blvd., Suite 100
Morgan Hill, CA 95037

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May 4, 2009

Mr. Bill Skinner, City Manager
City of Coalinga
155 W. Durian
Coalinga, CA 93210

RE: Comments on General Plan Update and MEIR as Submitted to the Planning Commission on April 28, 2009

31.1

Dear Bill,

As requested, we have summarized the General Plan Update comments presented at the Planning Commission hearing of April 28, 2009. The comments consisted of four major points as described below.

1. New Development Location (Implementation Measure LU1-1.10, page 2-40): "New development proposals shall be located within the existing City limits to the maximum extent feasible to prevent sprawl and premature annexations of SOI lands."

   This implementation measure should be revised to be consistent with the 1) proposed land plan that shows substantial development outside the existing City limits and 2) Implementation Measure LU1-5.7 that requires annexation requests to be contiguous or otherwise appropriate to avoid premature development.

   We suggest the following revision to the implementation measure:

   > New development proposals ~~shall~~ should be located within or adjacent to the ~~existing~~ City limits to provide for orderly expansion of the City ~~the maximum extent feasible to prevent sprawl and premature annexations of SOI lands~~.

2. Agricultural Land Mitigation (Implementation Measure LU7-2.1, page 2-50 to 2-52): It will be very difficult and cost prohibitive for a developer to acquire conservation easements at a 1:1 ratio for each acre developed. This would add significantly to the upfront costs of initiating a project that could in turn make the project economically infeasible when added to the other fees and infrastructure improvements costs required by the City.

   A more cost effective approach rather than purchasing large swathes of agricultural easements on land that may never be developed in any case, would be to focus attention on properties that would form a permanent urban/rural boundary for the City. A much lower ratio may then be sufficient for mitigation.

Page 2

The timing of payment of in lieu fees would be more feasible if it were stages such as certificate of occupancy and escrow where more financing is available to the applicant.

31.1

We suggest the following revisions to the implementation measure:

Implementation Measure LU7-2.1
Development projects shall be required to mitigate for loss of farmland by either (1) granting a farmland conservation easement to or for the benefit of the City and/or a qualifying entity approved by the City, at a 1:1 ratio for each acre developed or an equivalent as specified in a development agreement between the project applicant and the City, or (2) by payment of an in lieu fee as established by the City, which shall be reviewed and adjusted periodically to ensure that the fee is adequate to offset the cost of purchasing farmland conservation easements at a 1:1 ratio or a proportionate share of an agricultural buffer zone around the City's planned growth area or, (3) as determined by LAFCO and/or the Department of Conservation.

The City shall prepare Agricultural Conservation Guidelines identifying requirements for conservation easements, including timing of conservation easements, location of land to be preserved, including an agricultural buffer zone around the City's planned growth area, land mitigation ratio and quality and minimum standards for conservation easements.

The Agricultural Conservation Guidelines would include the following elements:

A. Timing of Conservation Easements

Direct acquisition of conservation easements by a project applicant shall occur on or before the issuance of certificates of occupancy for the Project or as specified in a development agreement between the project applicant and the City~~grading permits~~. ~~This approach requires that~~ These conservation easements shall be acquired for the benefit of the City ~~as farmland is actually converted at the project site~~. Preservation of off-site farmland may be done for the entire project at one time, ~~prior to the City's approval of the project's first grading permit.~~ or, alternatively, ~~preservation~~ may be done in increments with the build-out of the Project as specified in a development agreement with the City~~amount~~, ~~with preservation occurring prior to issuance of each grading permit.~~

B. Location of Land to be Preserved
The farmland to be preserved through this program shall be located in Pleasant Valley, in proximity to the land being impacted, and on similar soil types, to the extent feasible, or in an agricultural buffer zone around the City's planned growth area. Those lands directly north and south of the City's SOI, identified as Prime in Figure 3-2 (presented in the Open Space and Conservation Element of this General Plan), would meet this requirement and should be considered ideal candidates for farmland mitigation sites.

Page 3

C. Land Mitigation Ratio and Quality
The ratio of farmland to be preserved to farmland developed at the project site shall be a 1:1 ratio or an equivalent as specified in a development agreement between the project applicant and the City. Easements obtained by the Project Applicant must preserve either Farmland of Statewide Importance or Prime Farmland, or be within an agricultural buffer zone around the City's planned growth area.

D. Minimum Standards for Conservation Easements
While the specific terms of each individual conservation easement necessarily vary, the following standards must be met before the City will accept any easement as mitigation:
a) If the land to be developed is designated as Farmland of Statewide Importance, so the conservation easement(s) acquired shall preserve either Farmland of Statewide Importance or Prime Farmland, or be within an agricultural buffer zone around the City's planned growth area. .
b) All owners of the agricultural mitigation land shall execute the document encumbering the land.
c) The document shall be recordable and contain an accurate legal description of the agricultural mitigation land.
d) The document shall prohibit any activity which substantially impairs or diminishes the agricultural productivity of the land.
e) The document shall protect any existing water rights necessary to maintain agricultural uses on the land covered by the document, and retain such water rights for ongoing use on the agricultural mitigation land.
f) The Applicant shall pay to the City an agricultural mitigation monitoring fee to cover the costs of administering, monitoring and enforcing the document in an amount determined by the receiving entity, not to exceed 10% of the easement price paid by the applicant, or a different amount approved by the City Council not to exceed 15% of the easement price paid by the applicant.
g) The City shall be named a beneficiary under any document conveying the interest in the agricultural mitigation land to an entity acceptable to the City.
h) Interests in agricultural mitigation land shall be held in trust by an entity acceptable to the City and/or the City in perpetuity. The entity shall not sell, lease, or convey any interest in agricultural mitigation land which it shall acquire without the prior written approval of the City.
i) If any qualifying entity owning an interest in agricultural mitigation land ceases to exist, the duty to hold, administer, monitor and enforce the interest shall be transferred to another entity acceptable to the City or to the City.

E. In Lieu Fees
In lieu fees for the conservation of farmland shall be paid to the City and/or qualifying entity approved by the City prior to or upon close of escrow of development (for each residential structure and each commercial, office, and industrial building) within the Project~~approval of grading permits~~. The City's continuing consultations with conservation agencies and organizations, as well as an assessment of the geographic area will suggest a reasonable current market value for any agricultural land conservation easement. ~~Fees will be collected on or before the issuance of grading~~

31.1

Page 4

~~permits~~. The applicant may also pay the ~~entire~~ in lieu fees as specified in a development agreement with the City~~amount prior to issuance of the first grading permit~~.

3. Development within 100 Year Floodplain (Implementation Measure S2-3.2, Page 5-34 and Implementation measure S3-1.4, Page 5-36): The first implementation measure S2-3.2 allows development within the FEMA identified 100 year flood plain only if the flood maps are revised by FEMA due to flood control improvements or base elevations are raised to protect new development from flooding. The second implementation measure S3-1.4 states "Require new development to avoid building in the 100 year floodplain to the extent feasible. Locating structures/facilities in the 100 year floodplain shall be discouraged." This raises an inconsistency between the two measures, as development is allowed in the 100 year flood plain under certain specified conditions in the first measure while it is discouraged across the board in the second measure.

   We request that the language of the implementation measures be revised to be consistent with the land use plan which allows development within the flood plain providing flood control improvements are made or base elevations are raised to protect new development from flooding as acknowledged by FEMA.

31.1

4. Five Year Phasing Plan, Final MEIR, Errata Sheet, #30 and Figure V.H-2, Pages II-13 and II-14: Figure V.H.-2 Potential Phasing Map shows areas with projected phasing dates in 5 year increments. We request that this map be revised to be consistent with applications in progress, and that the Villages of Los Gatos Creek be designated for development ~~by~~ prior to 2015.

   In addition, we request that the text proposed in the Errata for ***Residential*** be revised to be consistent with the Phasing Map and that all dates be set for when development is to occur by, e.g. "one area is recommended for development ~~by~~ prior to the year 2015, and the other four areas are recommended for ~~consideration~~ development ~~by~~ prior to year 2020."

   It will also be necessary to adjust associated buildout tables and infrastructure demand to correspond to the revisions in phasing.

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Please contact me if you desire further clarification or have any questions.

Sincerely,

Michael Hitchcock
Director of Community Planning

31. Los Gatos Creek Estates, LLC

31.1 The City Council and Planning Commission directed staff to incorporate the changes they felt were appropriate as requested in this letter. Changes have been made accordingly to the Land Use Element and Master EIR.

C. LIST OF CHANGES TO THE DRAFT GENERAL PLAN UPDATE, DATED NOVEMBER 2008

32. Implementation Measure C3-1.2 in the Land Use Element Update will be amended to read as follows:

Install dedicated sidewalks along major arterials and collectors, and plant and maintain trees to reinforce a pedestrian-friendly atmosphere.

33. Change Implementation Measure LU1-1.10 on page 2-40 to read as follows:

New development proposals shall be located within or adjacent to the City limits in accordace with the proposed phases to provide for orderly expansion of the City.

34. Change Implementaion Measure LU7-2.1 on Page 2-50 to read as follows:

Development promects shall be required to mitigate for loss of farmland by either (1) granting a farmland conservation easement to or for the benefit of the City and/or a qualifying entity approved by the City, at a 1:1 ratio for each acre developed or an equivalent as specified in a development agreement between the project applicant and the City, or (2) by payment of an in lieu fee as established by the City, which shall be reviewed and adjusted periodically to ensure that the fee is adequate to offset the cost of purchasing farmland conservation easements at a 1:1 ratio or a proportionate share of an agricultural buffer zone around the City's planned growth area or, (3) as negotiated by LAFCO and/or the Department of Conservation, and the city during the annexation process.

The City shall prepare Agricultural Conservation Guidelines identifying requirements for conservation easements, including timing of conservation easements, location of land to be preserved, including consideration of an agicultural buffer zone around the City's planned growth area, land mitigation ratio and quality, and minimum standards for conservation easements.

The Agricultural Conservation Guidelines would include the following elements:

A. Timing of Conservation Easements

Direct acquisition of conservation easements by a project applicant shall occur on or before the issuance of certificates of occupancy for the Project or as specified in a

development agreement between the project applicant and the City. These conservation easements shall be acquired for the benefit of the City. Preservatio of off-site farmland may be done for the entire project at one time, or alternatively, may be done in increments with the build-out of the Project as specified in a development agreement with the City.

B. Location of Land to be Preserved

The farmland to be preserved through this program shall be located in Pleasant Valley, in proximity to the land being impacted, and on similar soil types, to the extent feasible, or in an agricultural buffer zone around the City's planned growth area. Those lands diretly north and south of the City's SOI, identified as Prime in Figure 3-2 (presented in the Open Space and Conservation Element of this General Plan), would meet this requirement and should be considered ideal candidates for farmland mitigation sites.

C. Land Mitigation Ratio and Quality

The ratio of farmland to be preserved to farmland developed at the project site shall be a 1;1 ratio or an equivalent as specified in a development agreement between the project applicant and the City. Easements obtained by the Project Applicant must preserve either Farmland of Statewide Importance or Prime Farmland, or be within an agricultural buffer zone around the City's planned growth area.

D. Minimum Standards for Conservation Easements

While the specific terms of each individual conservation easement necessarily vary, the following standards must be met before the City will accept any easement as mitigation:

a) If the land to be developed is designated as Farmland of Statewide Importance, so the conservation easement(s) acquired shall preserve either Farmland of Statewide Importance or Prime Farmland, or be within an agricultural buffer zone around the City's planned growth area. .
b) All owners of the agricultural mitigation land shall execute the document encumbering the land.

c) The document shall be recordable and contain an accurate legal description of the agricultural mitigation land.

d) The document shall prohibit any activity which substantially impairs or diminishes the agricultural productivity of the land.

e) The document shall protect any existing water rights necessary to maintain agricultural uses on the land covered by the document, and retain such water rights for ongoing use on the agricultural mitigation land.

f) The Applicant shall pay to the City an agricultural mitigation monitoring fee to cover the costs of administering, monitoring and enforcing the document in an amount determined by the receiving entity, not to exceed 10% of the easement price paid by the applicant, or a different amount approved by the City Council not to exceed 15% of the easement price paid by the applicant.

g) The City shall be named a beneficiary under any document conveying the interest in the agricultural mitigation land to an entity acceptable to the City.

h) Interests in agricultural mitigation land shall be held in trust by an entity acceptable to the City and/or the City in perpetuity. The entity shall not sell, lease, or convey any interest in agricultural mitigation land which it shall acquire without the prior written approval of the City.

i) If any qualifying entity owning an interest in agricultural mitigation land ceases to exist, the duty to hold, administer, monitor and enforce the interest shall be transferred to another entity acceptable to the City or to the City.

E. In Lieu Fees

In lieu fees for the conservation of farmland shall be paid to the City and/or qualifying entity approved by the City prior to or upon close of escrow of development (for each residential structure and each commercial, office, and industrial building) within the Projectapproval of grading permits. The City's continuing consultations with conservation agencies and organizations, as well as an assessment of the geographic area will suggest a reasonable current market value for any agricultural land conservation easement. Fees will be collected on or before the issuance of grading permits. The applicant may also pay the entire in lieu fees as specified in a development agreement with the Cityamount prior to issuance of the first grading permit.

35. Change Implementation Measure S3-1.2 on page 5-36 to read as follows:

Require new development proposed within a designated flood zone to use site planning techniques to ensure that structures are elevated at least one foot above the 100-year flood zone consistent with Implementation Measure S2-3.2

36. Change Implementation Measure S3-1.4 on page 5-36 to read as follows:

Require new development to avoid building in the 100 year floodplain to the extent feasible, consistent with Implementation Measure S2-3.2.

37. Change the following figures to show the correct city limits around the airport:
Figures 1-1, 2-1, 2-2, 2-4, 2-5a, 2-5b, 2-6,3-1, 3-2, 4-1, 4-2, 5-1, 5-2, and 5-3.

APPENDIX A

- Notice of Preparation (NOP) and Response Letters

CITY OF COALINGA
COMMUNITY DEVELOPMENT DEPARTMENT

NOTICE OF PREPARATION

DATE: October 30, 2006

TO:

FROM: Mr. Bill Skinner
Coalinga Community Development Director
c/o Mary B. Reents
Morro Group, Inc.
1422 Monterey Street, Suite C200
San Luis Obispo, CA 93401

SUBJECT: NOTICE OF PREPARATION OF A MASTER ENVIRONMENTAL IMPACT REPORT FOR THE CITY OF COALINGA GENERAL PLAN UPDATE.

The City of Coalinga will be the Lead Agency and will prepare a Master Environmental Impact Report (EIR) for the project identified below. We need to know the views of your agency as to the scope and content of the environmental information that is pertinent to your agency's statutory responsibilities in connection with the proposed project.

PLEASE provide us the following information at your earliest convenience, but no later than the 30-day comment period that will begin with your agency's receipt of the NOP.

1. **NAME OF CONTACT PERSON**. (Address and telephone number)

2. **PERMIT(S) or APPROVAL(S) AUTHORITY**. Please provide a summary description of these and send a copy of the relevant sections of legislation, regulatory guidance, etc.

3. **ENVIRONMENTAL INFORMATION FOR PERMIT**. What environmental information must be addressed in the EIR to enable your agency to use this documentation as a basis for your permit issuance or approval?

4. **ENVIRONMENTAL CONCERNS.** What potential environmental impacts or concerns does your agency have with regard to this project and are there any mitigation measures that you would like to see included to address these impacts or concerns?

5. **ALTERNATIVES**. What alternatives does your agency recommend be analyzed in equivalent level of detail with those listed below?

6. **RELEVANT INFORMATION**. Please provide references for any available, appropriate documentation you believe may be useful to the City in preparing the EIR.

7. **FURTHER COMMENTS**. Please provide any further comments or information that will help the city to scope the document and determine the appropriate level of environmental assessment.

Due to the time limits mandated by State law, your response must be sent at the earliest possible date, but no later than **30 days** after receipt of this notice.

Please send your response before December 6, 2006 to **Mary Reents on behalf of Bill Skinner** at the following address:

Mr. Bill Skinner
Coalinga Community Development Director
c/o Mary B. Reents
Morro Group, Inc.
1422 Monterey Street, Suite C200
San Luis Obispo, CA 93401

PROJECT TITLE: Coalinga 2025 General Plan Update Master Environmental Impact Report

PROJECT APPLICANT: The City of Coalinga

Responses due by: December 6, 2006

In addition, an EIR scoping meeting will be held. The EIR scoping meeting will be open to all interested parties and provide an opportunity for input relating to the scope and content of the EIR.
Once the details of that meeting have been established you will be notified.

Mary B. Reents

Telephone: (805) 543-7095
Fax: (805) 543-2367
Email: mreents@morrogroup.com

Reference: California Administrative Code, Title 14, Section 15082.

CITY OF COALINGA
NOTICE OF PREPARATION OF A MASTER ENVIRONMENTAL IMPACT REPORT
FOR THE
COALINGA GENERAL PLAN UPDATE

PROJECT DESCRIPTION AND LOCATION

A. PROJECT OBJECTIVES

The City of Coalinga is in the process of updating its General Plan. To comply with California Environmental Quality Act (CEQA) provisions, a Master EIR will be used to identify all potential environmental impacts associated with the update. The Master EIR will be prepared in accordance with the guidelines specified in Section 21100 of the CEQA Guidelines.

B. PROJECT LOCATION

The City of Coalinga is an incorporated community situated at the western end of Fresno County just off Interstate 5 along Highways 198 and 33. The City is located approximately 72 miles from the City of Fresno. Currently, the city has a population of approximately 16,423 (5,355 of which are in group quarters, primarily inmates in the City and State penal facilities).

C. PROJECT BACKGROUND

The City of Coalinga started review and revisions of their general plan several years ago. A preliminary draft of the plan was prepared but it did not meet the needs of the City. A notice of preparation to prepare an EIR on that plan was circulated in June 2002 and a revised one was sent out in February 2005. Because of the lapse of time since the original and revised Notices of Preparation, and because of changes to the content of the general plan revisions, this Notice of Preparation has been re-issued to provide the public and agencies with an additional opportunity to comment on the contents of the Master EIR for the proposed general plan update.

D. GENERAL PLAN UPDATE

At the current time, the Pacific Municipal Consultants is in the process of preparing updates for the following General Plan elements:

Land Use
Circulation
Open Space / Conservation
Noise / Safety
Public Facilities/Services Elements

Concurrently, a Multiple Species Habitat Conservation Plan (MSHCP) is underway and its recommendations and requirements will be considered for inclusion in the General Plan. The City has recently revised its Storm Drain Master Plan, Sewer System Master Plan, Water System Master Plan, and Natural Gas Master Plan, each of which will be incorporated into the Public Facilities/Services Elements of the General Plan update. The Master EIR will consider these plans as well.

A short description of the proposed tasks and objectives of each Element update is described below.

1. Land Use Element

The land use element is the foundation element that provides a basis for the future development by establishing, in general terms, the location and intensity of various land uses within the City limits. It describes the distribution of housing, business and industry, open spaces and other land uses, areas subject to flooding, the distribution of educational and other public. It also describes the current and proposed City boundaries, Spheres of Influence and Areas of Interest. The element includes goals and policies implementation measures to guide the decision making process in the community.

In addition to the land use designations, the Land Use Element establishes special planning areas for certain geographic areas around the City that may require additional consideration due to their location, and/or existing or proposed uses. Examples of these include the Gateway Overlay that applies to the geographic north and south entrances to the City, and the Flood Hazard overlay which is applied to lands within the 100 year floodplains of Los Gatos and Warthan Creeks.

The following table summarizes the proposed land uses and acreages proposed in the General Plan update LUE.

TABLE 1
City of Coalinga Land Use Diagram Acreages

Land Use	City Limits	SOI	Total
Residential Ranchette (RR)	0.00	526.44	526.44
Residential Estate (RE)	29.33	390.74	420.07
Residential Single Family (RSF)	678.66	1,271.24	1,949.90
Residential Multi-Family – Medium Density (RMD)	170.95	194.97	365.92
Residential High Density (RHD)	168.40	8.51	176.91
Mixed Use (MX)	41.14	0.00	41.14
Commercial General (CG)	95.90	8.35	104.24
Commercial Service (CS)	100.15	84.45	184.60
Manufacturing/Business (MB)	274.29	1,459.63	1,733.92
Public Facilities (PF)	1,921.14	443.09	2,364.23
Recreation (REC)	144.16	147.98	292.14
Open Space/Conservation (OS)	286.11	1,056.29	1,342.40
Agricultural (AG)	94.90	236.66	331.56
Subtotal	4,005.13	5,825.35	9,833.48
Streets right of ways etc. (estimated)	535.25	442.34	977.59
TOTAL	*4,540.38*	*6,270.69*	*10,811.07*

Source: PMC, Land Use Diagram GIS layer (land_use_diagram.shp) October 2006.

2. Circulation Element

The Circulation Element provides a long-range plan for the movement of people and goods into, out of and with in the City of Coalinga. The methods of transport include motorized vehicles, transit, bicycles and pedestrians. The Element describes the existing street network and identifies improvements intended to accommodate the buildout scenarios described in the Land Use Element.

Included in the Element are descriptions of existing and future traffic levels by ADT, or Average Daily Traffic. Streets are classified as either "arterial", which provide circulation between major activity centers, or "collector", which channel traffic from residential and commercial areas to arterials.

3. Open Space/Conservation Element

The open-space element is intended to guide the comprehensive and long-range preservation and conservation of open space land. Open-space land is defined in statute as any parcel or area of land or water that is essentially unimproved and devoted to open-space use. The conservation element provides direction regarding the conservation, development, and utilization of natural resources. Its requirements overlap those of the open-space, land use, safety, and circulation elements. The conservation element is distinguished by being primarily oriented toward natural resources.

Resources considered on these elements include agricultural rangeland, Los Gatos and Warthan Creeks, minerals and fossil fuels, scenic areas, and cultural resources.

Coalinga Habitat Conservation Plan (CHCP)

The Conservation Element includes discussion of the Coalinga Habitat Conservation Plan. Lands within the existing City limits and proposed SOI provide habitat for various federally and state listed species. The plan was intended to streamline the permitting process at the local level, include provisions so that all parties involved can share costs associated with the permitting process, and to establish standards that would provide for the protection of biological resources. A draft CHCP was prepared in 2005. The plan provides useful background information regarding the species and habitat types found in the region and proposes a strategy for their conservation.

At the time of this NOP, for various reasons, the City of Coalinga has chosen not to continue with the Habitat Conservation Plan process. However, the Open Space and Conservation Element policies reflect some of the information within the draft plan.

4. Air Quality/Noise/Safety Element

The Safety element is to reduce the potential risk of death, injuries, property damage, and economic and social dislocation resulting from fires, floods, earthquakes, landslides, and other hazards. Specifically the topics covered include seismic hazards, flooding, wildland and urban fire, manmade hazards, and disaster planning.

The Air Quality Element is not required by state law, but has been included in the City's update because of air quality problems in the San Joaquin Valley. The Element describes air quality standards and establishes policies intended to reduce the air quality impacts of future development in the City of Coalinga.

The purpose of the Noise Element is to limit the exposure of the community to excessive noise levels. The element identifies noise sources in the City of Coalinga, including major roadways, the airport, and agricultural operations. It also describes acceptable noise levels based on land use designation and measures that can be used to reduce the potentially harmful effects of excessive noise.

5. Public Facilities/Services Element

This Element describes the existing public facilities and services, including police and fire department protection, schools, the airport, and the water and wastewater systems. It identifies potential deficiencies in these systems and recommends policies and implementation measures to ensure that adequate facilities and systems are in place to provide for the residents of Coalinga.

This element will also incorporate recent master plan updates for Storm Water, Sewer System, Water System and Natural Gas.

6. Housing Element

The Housing Element *will not* be updated as part of this work effort.

SCOPE OF THE MASTER EIR

The following discussion outlines the issues that will be addressed in the EIR, based on the probable environmental effects associated with the proposed General Plan update, as identified by the City. **Please indicate any additions or corrections to the proposed scope of work as part of your response to this Notice of Preparation**. The Master EIR will address the following project components:

- General Plan Update Elements
- Subsequent Projects (as known at the time of the General Plan Update)

The Master EIR will utilize all existing information to aid in its preparation. Data will be collected from all available sources at the onset of EIR preparation. If there is insufficient data or data that is not available on a particular environmental topic, impacts that are speculative will be identified and called out accordingly. The City would like to have as detailed a Master EIR as possible to use in tiering environmental review on subsequent projects. The outline for the Master EIR will be as follows:

1. *Summary*. Data will be submitted in tabular form to the extent feasible.

2. *Project Description*. The project description will include a description of subsequent projects to be discussed within the scope of the Master EIR, including the HCP.
3. *Environmental Setting*. This will include a discussion of the general setting and cumulative impact tables for use in the discussion on anticipated environmental effects.
4. *Environmental Impacts and Mitigation Measures.* This will include a discussion of the anticipated significant and potential effects of subsequent projects for which sufficient information is lacking in order to prepare a full assessment. Mitigation measures will be recommended to reduce potential impacts and will be incorporated into the General Plan update as appropriate. The environmental impact topics to be included will be an inclusive list (refer to Attachment A, Initial Study Checklist), as follows:

    - Aesthetics
    - Agricultural Resources
    - Air Quality
    - Biological Resources
    - Cultural Resources
    - Drainage, Erosion, Sedimentation, and Flooding
    - Geology, Soils, and Seismicity
    - Land Use
    - Mineral Resources
    - Noise
    - Population and Housing
    - Public Services and Utilities
    - Transportation and Circulation

5. *Cumulative Impacts*. This will include the cumulative impacts associated with subsequent projects.
6. *Significant Effects Which Cannot be Avoided*.
7. *Project Alternatives*. The alternatives section of the EIR will be prepared in accordance Section 15126(d) of the CEQA Guidelines, and will include as required the "No-Project" alternative. The discussion will include reasonable alternatives capable of eliminating or reducing significant adverse environmental effects. The environmentally superior alternative will be identified, and if it is identified as the "No-Project" alternative then a preferred or environmentally superior alternative among the other alternatives will be included. Secondary impacts of the alternatives will be discussed, but in less detail than the significant effects of the project as per CEQA section 15126(d)(4).
8. *Relationship Between Short-term Uses and Long-term Productivity*
9. *Significant Irreversible Environmental Changes*. This will include irreversible changes associated with subsequent projects.
10. *Growth-inducing Impacts*. This will include growth-inducing impacts as they relate to subsequent projects.
11. *Impacts Not Found to be Significant*. Impacts that are determined in the analysis not to have significant impacts will be identified and discussed.

ATTACHMENT A

- Initial Study Checklist

Issues, Discussion and Supporting Information Sources	Unknown Impacts	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
1. AESTHETICS. Would the project:					
a) Have a substantial adverse effect on a scenic vista?				X	
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, open space, and historic buildings within a local or state scenic highway?				X	
c) Substantially degrade the existing visual character or quality of the site and its surroundings?				X	
d) Create a new source of substantial light or glare which would adversely effect day of nighttime views in the area?				X	
Discussion: Impacts to visual resources within the City are not expected to be significant as a result of the General Plan update.					
2. AGRICULTURE RESOURCES. Would the project:					
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps 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) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?		X			
Discussion: Depending on the update of the Land Use Map for the City, there is the potential for current agricultural designations to be converted to other urban, non-agricultural land uses.					
3. AIR QUALITY. Would the project:					
a) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?		X			
b) Conflict with or obstruct implementation of the applicable air quality plan?		X			
c) Expose sensitive receptors to substantial pollutant concentrations?		X			
d) Create objectionable odors affecting a substantial number of people?		X			
e) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed qualitative thresholds for ozone precursors)?		X			

Issues, Discussion and Supporting Information Sources	Unknown Impacts	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
Discussion: Air quality impacts will be evaluated and mitigated where possible. However, the General Plan calls for increases in housing and employment to occur over the next 20 years. Inevitably, there will be air quality impacts associated with increases in jobs and housing.					
4. BIOLOGICAL RESOURCES. Would the project:					
a) Have a substantial adverse effect, either directly or indirectly 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, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?		X			
c) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance (e.g. Heritage Trees)?		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 wildlife nursery sites?		X			
e) 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			
f) Have a substantial adverse effect on federally protected wetlands as defined in Section 404 of the Clean Water Act (including, but not limited to, marshes, vernal pools, etc.) through direct removal, filling, hydrological interruption, or other means?		X			
Discussion: The General Plan update will incorporate the proposed Coalinga Habitat Conservation Plan (HCP). Modifications to the HCP are unknown at this time.					
5. CULTURAL RESOURCES. Would the project:					
a) Cause a substantial adverse change in the significance of a historic resource? (See CEQA Guidelines 15064.5)	X				
b) Cause a substantial adverse change in the significance of an archeological resource? (See	X				

Issues, Discussion and Supporting Information Sources	Unknown Impacts	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
CEQA Guidelines 15064.5)					
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	X				
d) Disturb any human remains, including those interred outside of formal cemeteries?	X				
Discussion: Impacts to cultural resources within the City are not expected to be significant as a result of the General Plan update.					
6. ENERGY AND MINERAL RESOURCES. Would the project:					
a) Conflict with adopted energy conservation plans?				X	
b) Use non-renewable resources in a wasteful and inefficient manner?				X	
c) 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	
Discussion: Impacts to energy and mineral resources within the City are not expected to be significant as a result of the General Plan update.					
7. GEOLOGY AND SOILS. Would the project:					
a) Expose people or structures to potential substantial adverse effects, including risk of loss, injury or death involving:					
I. Rupture of a known earthquake fault, as delineated in 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?			X		
II. Strong seismic ground shaking?			X		
III. Seismic related ground-failure, including liquefaction?			X		
IV. Landslides or mudflows?			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 landslides, 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 risks to life or property?			X		
Discussion: The City of Coalinga has historically been located in an area know for seismic instability. In 1983, the City suffered impacts of a 6.7 Richter scale earthquake, which destroyed many homes and					

businesses. Changes to the General Plan will still result in the potential for continued and increased seismic impacts on local infrastructure.					
8. HAZARDS AND HAZARDOUS MATERIALS. Would the project:					
a) Create a significant hazard to the public or the environment though the routine use, transport, 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) Expose people or structures to existing sources of hazardous emissions or hazardous or acutely hazardous materials, substances, or waste?			X		
e) 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, it would create a significant hazard to the public or the environment?			X		
f) For a project located within an airport land use plan, or within two miles of a public airport, would the project result in a safety hazard for the people residing or working in the project area?			X		
g) Impair implementation of, or physically interfere with, the adopted emergency response plan or emergency evacuation plan?			X		
h) Expose people or structures to a significant risk of lose, injury, or death, involving wildland fires, including where wildlands are adjacent to urbanized areas or where residents are intermixed with wildlands?			X		
Discussion: Impacts as a result of the use of hazardous materials or creating new hazards within the City are not expected to be significant as a result of the General Plan update. Oil related activities including, but not limited to, extraction wells are located in and adjacent to the project vicinity. Any changes associated with the General Plan update that affect the oil related activities that occur in the immediate area will be analyzed in the EIR.					
9. HYDROLOGY AND WATER QUALITY. Would the project:					
a) Violate any water quality standards or waste discharge requirements?		X			

Issues, Discussion and Supporting Information Sources	Unknown Impacts	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of preexisting nearby wells would drop to a level which would not support existing land uses for which permits have been granted)?		X			
c) Create or contribute runoff water which would exceed the capacity of existing or planned storm-water drainage systems or provide substantial additional sources of polluted runoff.			X		
d) Substantially alter the existing drainage pattern of the site or area in a manner which would result in substantial erosion or siltation onsite or offsite?			X		
e) Substantially alter the existing drainage pattern of the site or area in a manner which would result in substantial flooding onsite or offsite?			X		
f) Place housing within a 100-year flood hazard area as mapped on a Federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?			X		
g) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?			X		
h) Otherwise substantially degrade water quality?			X		
Discussion: The City currently has a water allocation of 10,000 acre-feet per year. This issue will be evaluated in the EIR due to its substantial effect on future growth and development of the City. Development as a result of the General Plan Update also has the potential for being located in the 100-year flood hazard area. These issues will be addressed in the EIR to determine their effects.					
10. LAND USE AND PLANNING - Would the project:					
a) Conflict with applicable land use plan, policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect?			X		
b) Physically divide an established community?				X	
c) Conflict with any applicable habitat conservation plan or natural community conservation plans?			X		
Discussion: The General Plan will be developed paying close attention to the proposed habitat conservation plan in order to ensure consistency between the two documents.					
11. NOISE. Would the project result in:					
a) Exposure of people to or generation of "unacceptable" noise levels as defined by the				X	

Issues, Discussion and Supporting Information Sources	Unknown Impacts	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
General Plan Noise Element, or general noise levels in excess of standards established in the Noise Ordinance?					
b) A substantial temporary, periodic, or permanent increase in ambient noise levels in the project vicinity above levels existing without the project?				X	
c) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?				X	
d) For a project located within an airport land use plan, or 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		
Discussion: Impacts as a result of noise within the City are not expected to be significant as a result of the General Plan update.					
12. POPULATION AND HOUSING. Would the project:					
a) Induce substantial population growth in an area, either directly (for example by proposing new homes or businesses) or indirectly (for example, through extension of roads or other infrastructure)?			X		
b) Displace substantial numbers of existing housing or people necessitating the construction of replacement housing elsewhere?			X		
Discussion: The basis of the General Plan is to account for future population growth and infrastructure demands for the next 20 years. Therefore, potential impacts will be evaluated as a result of new proposed growth.					
13. PUBLIC SERVICES. Would the project result in substantial adverse physical impacts associated with the provision, or need, of new or physically altered government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:					
a) Fire protection?			X		
b) Police protection?			X		
c) Schools?			X		
d) Parks?			X		
e) Roads and other transportation infrastructure?			X		
f) Other public facilities?			X		
Discussion: New growth and infrastructure for the City will undoubtedly impact public service demands and needs. These issues will be evaluated in the EIR.					
14. RECREATION. Would the project:					
a) Increase the use of existing neighborhood or			X		

Issues, Discussion and Supporting Information Sources	Unknown Impacts	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?					
b) Include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?			X		
Discussion: Impacts associated with the need with for new recreational facilities are not expected to be significant. Mitigation measures can and will be developed to mitigate recreational impacts.					
15. TRANSPORTATION/TRAFFIC. Would the project:					
a) Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system?			X		
b) Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads and highways?			X		
c) Substantially increase hazards due to design features (e.g. sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment)?			X		
d) Result in inadequate emergency access?			X		
e) Result in inadequate parking capacity onsite or offsite?			X		
f) Conflict with adopted policies supporting alternative transportation (e.g. bus turnouts, bicycle racks)?			X		
Discussion: New growth and infrastructure for the City will undoubtedly increase traffic in the City. These issues will be evaluated in the EIR.					
16. UTILITIES AND SERVICE SYSTEMS. Would the project:					
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?		X			
b) Require or result in the construction or expansion of new water treatment, wastewater treatment, or storm drainage facilities, the construction of which could cause significant environmental effects?		X			
c) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new and expanded water resources needed?		X			
d) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the		X			

Issues, Discussion and Supporting Information Sources	Unknown Impacts	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
project's projected demand and addition to the provider's existing commitment?					
e) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?		X			
f) Comply with federal, state, and local statutes and regulations related to solid waste?		X			
Discussion: New growth and infrastructure for the City will increase the current strains on wastewater and the need for additional water sources. These impacts will be evaluated and mitigated to the degree possible.					
17. MANDATORY FINDINGS OF SIGNIFICANCE.					
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?		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 the 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			

STATE OF CALIFORNIA

Governor's Office of Planning and Research

State Clearinghouse and Planning Unit

Arnold
Schwarzenegger
Governor

Sean Walsh
Director

Notice of Preparation

February 28, 2005

To: Reviewing Agencies

Re: City of Coalinga General Plan Update Master EIR
SCH# 2005021140

Attached for your review and comment is the Notice of Preparation (NOP) for the City of Coalinga General Plan Update Master EIR draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

Mary Reents
City of Coalinga
1422 Monterey Street, Suite C200
c/o Morro Group, Inc.
San Luis Obispo, CA 93401-2944

with a copy to the State Clearinghouse in the Office of Planning and Research. Please refer to the SCH number noted above in all correspondence concerning this project.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,

Scott Morgan
Associate Planner, State Clearinghouse

Attachments
cc: Lead Agency

MAR - 4 2005

1400 TENTH STREET P.O. BOX 3044 SACRAMENTO, CALIFORNIA 95812-3044
TEL (916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

Document Details Report
State Clearinghouse Data Base

SCH# 2005021140
Project Title City of Coalinga General Plan Update Master EIR
Lead Agency Coalinga, City of

Type NOP Notice of Preparation

Description The City of Coalinga is updating the General Plan Amendment to year 2025 and extending its Sphere of Influence boundary. A previous NOP was submitted; the General Plan is being revised and changed to include additional element updates to the General Plan.

Lead Agency Contact

Name Mary Reents
Agency City of Coalinga
Phone 805.543.7095 ext. 103 **Fax**
email
Address 1422 Monterey Street, Suite C200
c/o Morro Group, Inc.
City San Luis Obispo **State** CA **Zip** 93401-2944

Project Location

County Fresno
City Coalinga
Region
Cross Streets Entire Community
Parcel No. Various
Township 21S **Range** 16E **Section** **Base** Coalinga

Proximity to:

Highways 133
Airports Coalinga
Railways
Waterways
Schools West Hills Community College
Land Use Various

Project Issues Aesthetic/Visual; Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Drainage/Absorption; Economics/Jobs; Flood Plain/Flooding; Geologic/Seismic; Minerals; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Septic System; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Wildlife; Landuse; Cumulative Effects

Reviewing Agencies Resources Agency; Department of Parks and Recreation; Department of Water Resources; Native American Heritage Commission; Office of Emergency Services; Department of Fish and Game, Region 4; California Highway Patrol; Caltrans, District 6; Regional Water Quality Control Bd., Region 5 (Fresno)

Date Received 02/28/2005 **Start of Review** 02/28/2005 **End of Review** 03/29/2005

Note: Blanks in data fields result from insufficient information provided by lead agency.

NOP Distribution List

County: Fresno

SCH#

Resources Agency

- [x] **Resources Agency**
  Nadell Gayou
- [ ] **Dept. of Boating & Waterways**
  David Johnson
- [ ] **California Coastal Commission**
  Elizabeth A. Fuchs
- [ ] **Colorado River Board**
  Gerald R. Zimmerman
- [ ] **Dept. of Conservation**
  Roseanne Taylor
- [ ] **California Energy Commission**
  Environmental Office
- [ ] **Dept. of Forestry & Fire Protection**
  Allen Robertson
- [ ] **Office of Historic Preservation**
  Wayne Donaldson
- [x] **Dept of Parks & Recreation**
  B. Noah Tilghman
  Environmental Stewardship Section
- [ ] **Reclamation Board**
  DeeDee Jones
- [ ] **Santa Monica Mountains Conservancy**
  Paul Edelman
- [ ] **S.F. Bay Conservation & Dev't. Comm.**
  Steve McAdam
- [x] **Dept. of Water Resources**
  Resources Agency
  Nadell Gayou

Fish and Game

- [ ] **Depart. of Fish & Game**
  Scott Flint
  Environmental Services Division
- [ ] **Fish & Game Region 1**
  Donald Koch
- [ ] **Fish & Game Region 2**
  Banky Curtis
- [ ] **Fish & Game Region 3**
  Robert Floerke
- [x] **Fish & Game Region 4**
  William Laudermilk
- [ ] **Fish & Game Region 5**
  Don Chadwick
  Habitat Conservation Program
- [ ] **Fish & Game Region 6**
  Gabrina Gatchel
  Habitat Conservation Program
- [ ] **Fish & Game Region 6 I/M**
  Tammy Allen
  Inyo/Mono, Habitat Conservation Program
- [ ] **Dept. of Fish & Game M**
  George Isaac
  Marine Region

Other Departments

- [ ] **Food & Agriculture**
  Steve Shaffer
  Dept. of Food and Agriculture
- [ ] **Depart. of General Services**
  Public School Construction
- [ ] **Dept. of General Services**
  Robert Sleppy
  Environmental Services Section
- [ ] **Dept. of Health Services**
  Veronica Rameriz
  Dept. of Health/Drinking Water

Independent Commissions,Boards

- [ ] **Coachella Valley Mountains Conservancy**
- [ ] **Delta Protection Commission**
  Debby Eddy
- [x] **Office of Emergency Services**
  Dennis Castrillo
- [ ] **Governor's Office of Planning & Research**
  State Clearinghouse
- [x] **Native American Heritage Comm.**
  Debbie Treadway
- [ ] **Public Utilities Commission**
  Ken Lewis
- [ ] **San Gabriel & Lower LA Rivers**
- [ ] **San Joaquin River Conservancy**
- [ ] **State Lands Commission**
  Jean Sarino
- [ ] **Tahoe Regional Planning Agency (TRPA)**
  Cherry Jacques

Business, Trans & Housing

- [ ] **Caltrans - Division of Aeronautics**
  Sandy Hesnard
- [ ] **Caltrans - Planning**
  Terri Pencovic
- [x] **California Highway Patrol**
  John Olejnik
  Office of Special Projects
- [ ] **Housing & Community Development**
  Lisa Nichols
  Housing Policy Division

Dept. of Transportation

- [ ] **Caltrans, District 1**
  Mike Eagan
- [ ] **Caltrans, District 2**
  Don Anderson
- [ ] **Caltrans, District 3**
  Jeff Pulverman
- [ ] **Caltrans, District 4**
  Tim Sable
- [ ] **Caltrans, District 5**
  David Murray
- [x] **Clatrans, District 6**
  Marc Birnbaum
- [ ] **Caltrans, District 7**
  Cheryl J. Powell
- [ ] **Caltrans, District 8**
  John Pagano
- [ ] **Caltrans, District 9**
  Gayle Rosander
- [ ] **Caltrans, District 10**
  Tom Dumas
- [ ] **Caltrans, District 11**
  Mario Orso
- [ ] **Caltrans, District 12**
  Bob Joseph

Cal EPA

Air Resources Board

- [ ] Airport Projects
  Jim Lerner
- [ ] Transportation Projects
  Kurt Karperos
- [ ] Industrial Projects
  Mike Tollstrup

- [ ] **California Integrated Waste Management Board**
  Sue O'Leary
- [ ] **State Water Resources Control Board**
  Jim Hockenberry
  Division of Financial Assistance
- [ ] **State Water Resources Control Board**
  Student Intern, 401 Water Quality Certification Unit
  Division of Water Quality
- [ ] **State Water Resouces Control Board**
  Steven Herrera
  Division of Water Rights
- [ ] **Dept. of Toxic Substances Control**
  CEQA Tracking Center
- [ ] **Department of Pesticide Regulation**

Regional Water Quality Control Board (RWQCB)

- [ ] **RWQCB 1**
  Cathleen Hudson
  North Coast Region (1)
- [ ] **RWQCB 2**
  Environmental Document Coordinator
  San Francisco Bay Region (2)
- [ ] **RWQCB 3**
  Central Coast Region (3)
- [ ] **RWQCB 4**
  Jonathan Bishop
  Los Angeles Region (4)
- [ ] **RWQCB 5S**
  Central Valley Region (5)
  - [x] **RWQCB 5F**
    Central Valley Region (5)
    Fresno Branch Office
  - [ ] **RWQCB 5R**
    Central Valley Region (5)
    Redding Branch Office
- [ ] **RWQCB 6**
  Lahontan Region (6)
  - [ ] **RWQCB 6V**
    Lahontan Region (6)
    Victorville Branch Office
- [ ] **RWQCB 7**
  Colorado River Basin Region (7)
- [ ] **RWQCB 8**
  Santa Ana Region (8)
- [ ] **RWQCB 9**
  San Diego Region (9)

- [ ] **Other** _____

Last Updated on 9/16/04

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit

Arnold
Schwarzenegger
Governor

Sean Walsh
Director

Memorandum

APR - 6 2005

Date: March 30, 2005

To: All Reviewing Agencies

From: Scott Morgan, Senior Planner

Re: SCH # 2005021140
City of Coalinga General Plan Update Master EIR

The State Clearinghouse distributed the above-referenced Notice of Preparation on February 28, 2005 to your agency for review and comment. It has come to our attention that the document was issued a new State Clearinghouse Number in error. For all future correspondence regarding this project, please use the original State Clearinghouse Number **2002061026.** We apologize for any inconvenience this may have caused. All other project information remains the same.

cc: Mary Reents
City of Coalinga
c/o Morro Group, Inc.
1422 Monterey Street, Suite C200
San Luis Obispo, CA 93401-2944

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  Scott Flint
  Environmental Services Division
- [ ] **Fish & Game Region 1**
  Donald Koch
- [ ] **Fish & Game Region 2**
  Banky Curtis
- [ ] **Fish & Game Region 3**
  Robert Floerke
- [■] **Fish & Game Region 4**
  William Laudermilk
- [ ] **Fish & Game Region 5**
  Don Chadwick
  Habitat Conservation Program
- [ ] **Fish & Game Region 6**
  Gabrina Gatchel
  Habitat Conservation Program
- [ ] **Fish & Game Region 6 I/M**
  Tammy Allen
  Inyo/Mono, Habitat Conservation Program
- [ ] **Dept. of Fish & Game M**
  George Isaac
  Marine Region

Other Departments

- [ ] **Food & Agriculture**
  Steve Shaffer
  Dept. of Food and Agriculture
- [ ] **Depart. of General Services**
  Public School Construction
- [ ] **Dept. of General Services**
  Robert Sleppy
  Environmental Services Section
- [ ] **Dept. of Health Services**
  Veronica Rameriz
  Dept. of Health/Drinking Water

Independent Commissions,Boards

- [ ] **Coachella Valley Mountains Conservancy**
- [ ] **Delta Protection Commission**
  Debby Eddy
- [■] **Office of Emergency Services**
  Dennis Castrillo
- [ ] **Governor's Office of Planning & Research**
  State Clearinghouse
- [■] **Native American Heritage Comm.**
  Debbie Treadway
- [ ] **Public Utilities Commission**
  Ken Lewis
- [ ] **San Gabriel & Lower LA Rivers**
- [ ] **San Joaquin River Conservancy**
- [ ] **State Lands Commission**
  Jean Sarino
- [ ] **Tahoe Regional Planning Agency (TRPA)**
  Cherry Jacques

Business, Trans & Housing

- [ ] **Caltrans - Division of Aeronautics**
  Sandy Hesnard
- [ ] **Caltrans - Planning**
  Terri Pencovic
- [■] **California Highway Patrol**
  John Olejnik
  Office of Special Projects
- [ ] **Housing & Community Development**
  Lisa Nichols
  Housing Policy Division

Dept. of Transportation

- [ ] **Caltrans, District 1**
  Mike Eagan
- [ ] **Caltrans, District 2**
  Don Anderson
- [ ] **Caltrans, District 3**
  Jeff Pulverman
- [ ] **Caltrans, District 4**
  Tim Sable
- [ ] **Caltrans, District 5**
  David Murray
- [■] **Clatrans, District 6**
  Marc Birnbaum
- [ ] **Caltrans, District 7**
  Cheryl J. Powell
- [ ] **Caltrans, District 8**
  John Pagano
- [ ] **Caltrans, District 9**
  Gayle Rosander
- [ ] **Caltrans, District 10**
  Tom Dumas
- [ ] **Caltrans, District 11**
  Mario Orso
- [ ] **Caltrans, District 12**
  Bob Joseph

Cal EPA

Air Resources Board

- [ ] Airport Projects
  Jim Lerner
- [ ] Transportation Projects
  Kurt Karperos
- [ ] Industrial Projects
  Mike Tollstrup

- [ ] **California Integrated Waste Management Board**
  Sue O'Leary
- [ ] **State Water Resources Control Board**
  Jim Hockenberry
  Division of Financial Assistance
- [ ] **State Water Resources Control Board**
  Student Intern, 401 Water Quality Certification Unit
  Division of Water Quality
- [ ] **State Water Resouces Control Board**
  Steven Herrera
  Division of Water Rights
- [ ] **Dept. of Toxic Substances Control**
  CEQA Tracking Center
- [ ] **Department of Pesticide Regulation**

Regional Water Quality Control Board (RWQCB)

- [ ] **RWQCB 1**
  Cathleen Hudson
  North Coast Region (1)
- [ ] **RWQCB 2**
  Environmental Document Coordinator
  San Francisco Bay Region (2)
- [ ] **RWQCB 3**
  Central Coast Region (3)
- [ ] **RWQCB 4**
  Jonathan Bishop
  Los Angeles Region (4)
- [ ] **RWQCB 5S**
  Central Valley Region (5)
  - [■] **RWQCB 5F**
    Central Valley Region (5)
    Fresno Branch Office
  - [ ] **RWQCB 5R**
    Central Valley Region (5)
    Redding Branch Office
- [ ] **RWQCB 6**
  Lahontan Region (6)
  - [ ] **RWQCB 6V**
    Lahontan Region (6)
    Victorville Branch Office
- [ ] **RWQCB 7**
  Colorado River Basin Region (7)
- [ ] **RWQCB 8**
  Santa Ana Region (8)
- [ ] **RWQCB 9**
  San Diego Region (9)

- [ ] **Other** _____

Last Updated on 9/16/04

DEPARTMENT OF CONSERVATION
STATE OF CALIFORNIA

DIVISION OF OIL, GAS, & GEOTHERMAL RESOURCES

466 N. FIFTH STREET
COALINGA
CALIFORNIA
93210

PHONE
559/935-2941

FAX
559/935-5154

TDD
916/324-2555

INTERNET
consrv.ca.gov

ARNOLD
SCHWARZENEGGER
GOVERNOR

March 11, 2005

Mary Reents
Morro Group, Inc.
1422 Monterey Street, Suite C200
San Luis Obispo, CA 93401

RE: Coalinga 2025 General Plan Update Master Environmental Impact Report

The Division of Oil, Gas, and Geothermal Resources regulates oil and gas well operations, well drilling, and oil field activities. The authority is listed in Division 3, Chapter 1 of the Public Resources Code.

Our main concerns are when the City of Coalinga grows and expands it will encroach on existing and abandoned oil wells and sites. Although this activity is inevitable, the location of any wells in the area must be noted. In the event of an abandoned well its presence from the surface may not be apparent. We do not recommend siting a building over an abandoned oil and gas well.

It is important that the City know in advance any such well location(s) and coordinate it's permitting with our office prior to issuing any building permits or projects.

Our contacts are:

Timothy Boardman
or
Glenn Muggelberg
466 N. Fifth Street
Coalinga, CA 93210
(559) 935-2941

Thank you.

Timothy S. Boardman
District Deputy
California Division of Oil, Gas, & Geothermal Resources
Coalinga
Email: tboardma@consrv.ca.gov

Maps: 521 & W5-1 enclosed

DEPARTMENT OF TRANSPORTATION
DISTRICT 6
1352 WEST OLIVE AVENUE
P.O. BOX 12616
FRESNO, CA 93778-2616
PHONE (559) 445-5868
FAX (559) 488-4088
TTY (559) 488-4066

Flex your power!
Be energy efficient!

March 15, 2005

2131-IGR/CEQA
6-FRE-GEN
NOP/DEIR
G.P. UPDATE
SCH 2005021140

Mr. Bill Skinner
City of Coalinga
C/O Mary B. Reents
Morro Group, Inc.
1422 Monterey Street, Suite C200
San Luis Obispo, CA 93401

Dear Mr. Skinner:

We have completed our review of the City's proposal to update its General Plan. Caltrans has the following comments:

There are currently only two State highways (State Route(SR) 33 and SR 198) located within the City as well as the City's proposed Sphere-of-Influence. A portion of Interstate 5, including the interchange of I-5 and SR 198, is within the City's Area-of-Interest.

The current Route Concept Report for SR 33 indicates that the majority of the route that is within the proposed Sphere-of-Influence will remain a 2-lane conventional highway. The segment of SR 33 that is located between 5th Street and Phelps is an urban 4-lane conventional highway. The intersection at Phelps is currently the only SR 33 intersection with signal control. Since the intersections at 3rd Street and 5th Street currently have all-way stop control, it is highly likely that they will be signalized in the future. It is recommended that the City's General Plan Update include a mechanism for funding improvements to these two intersections.

The current Route Concept Report for SR 198 indicates that the majority of the route that is within the proposed Sphere-of-Influence will remain a 2-lane conventional highway. The segment of SR 198 that is located between Polk and 5th Street is an urban 4-lane conventional highway. The intersection at Polk is currently the only SR 198 intersection with signal control.

It is recommended that the General Plan Update include direction regarding new road connections to State highways. Caltrans typically recommends that rural signalized intersections should be spaced no closer than 1/2 mile from center to center. Collector roads are typically located between signalized intersections at 1/4-mile spacing. Proposed driveways along rural

State highways should be located no closer that 250 feet on the approach leg to an intersection. Proposed driveways should be located no closer that 200 feet on the departure leg from an intersection. Spacing between adjacent driveways will be based on the posted speed limit. For 35mph, the minimum spacing should be 130 feet. For 45mph, the minimum spacing should be 165 feet. For 55mph, the minimum spacing should be no less than 250 feet.

An encroachment permit must be obtained for all proposed activities for placement of encroachments within, under or over the State highway rights-of-way. Activity and work planned in the State right-of-way shall be performed to State standards and specifications, at no cost to the State. Engineering plans, calculations, specifications, and reports (documents) shall be stamped and signed by a licensed Engineer or Architect. Engineering documents for encroachment permit activity and work in the State right-of-way may be submitted using English Units. The Permit Department and the Environmental Planning Branch will review and approve the activity and work in the State right-of-way before an encroachment permit is issued. Encroachment permits will be issued in accordance with Streets and Highway Codes, Section 671.5, "Time Limitations."

Please be advised that any future development adjacent to a State Route, whether the entitlement is deemed by the lead agency to be discretionary or ministerial should be sent to Caltrans for review. Also, please send a response to our comments prior to staff's recommendations to the Planning Commission and the City Council. If you have any questions, please call me at (559) 445-5868.

Sincerely,

MICHAEL NAVARRO
Office of Transportation Planning
District 06

C: State Clearinghouse

STATE OF CALIFORNIA
PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

ARNOLD SCHWARZENEGGER, *Governor*

May 6, 2005

File No.:183-10
SCH# 2005021140

Mary Reents
City of Coalinga
1422 Monterey Street, Suite C200
San Luis Obispo, CA 93401

Dear Ms. Reents:

Re: City of Coalinga General Plan Update Master EIR

As the state agency responsible for rail safety within California, we recommend that any development projects planned adjacent to or near the rail corridor in the County be planned with the safety of the rail corridor in mind. New developments may increase traffic volumes not only on streets and at intersections, but also at at-grade highway-rail crossings. This includes considering pedestrian circulation patterns/destinations with respect to the Union Pacific Railroad right-of-way.

Safety factors to consider include, but are not limited to, the planning for grade separations for major thoroughfares, improvements to existing at-grade highway-rail crossings due to increase in traffic volumes and appropriate fencing to limit the access of trespassers onto the railroad right-of-way.

The above-mentioned safety improvements should be considered when approval is sought for the new development. Working with Commission staff early in the conceptual design phase will help improve the safety to motorists and pedestrians in the County.

If you have any questions in this matter, please call me at (415) 703-2795.

Very truly yours,

Kevin Boles
Utilities Engineer
Rail Crossings Engineering Section
Consumer Protection and Safety Division

California Regional Water Quality Control Board
Central Valley Region
Robert Schneider, Chair

Alan C. Lloyd, Ph.D.
Secretary for Environmental Protection

Fresno Branch Office
1685 E Street, Fresno, California 93706
(559) 445-5116 • Fax (559) 445-5910
http://www.waterboards.ca.gov/centralvalley

Arnold Schwarzenegger
Governor

21 March 2005

Ms. Mary Reents on behalf of Mr. Bill Skinner
Morro Group, Inc.
1422 Monterey Street, Suite C200
San Luis Obispo, CA 93401

NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT FOR CITY OF COALINGA GENERAL PLAN UPDATE (SCH NO. 2005021140), CITY OF COALINGA WWTF, FRESNO COUNTY

We reviewed the Notice of Preparation for the City of Coalinga General Plan Update draft Environmental Impact Report (DEIR) dated 28 February 2005. The General Plan update establishes planning policy for those lands within the City of Coalinga Sphere of Influence and is intended to apply through 2025. As part of the General Plan update, the City intends to enlarge its Sphere of Influence.

Regional Board Authority
The California Water Code (CWC) Section 13001 establishes the state board and regional boards as the principal state agencies with primary responsibility for the coordination and control of water quality. For specific legislation regarding regional board authority, refer to the links on the following website: http://www.swrcb.ca.gov/water_laws/.

EIR Required Information
To facilitate our review of the General Plan update, we request that the draft EIR (1) discuss the extent to which, if any, proposed changes in land use may adversely affect surface and ground water quality, (2) include an estimate of population growth for the planning period, (3) discuss plans for increasing the wastewater treatment and disposal capacity of the City's wastewater treatment facility. The draft EIR should consider any potential industrial wastewater generated as a result of the General Plan update and describe what measures the City will implement to ensure incoming industries will not result in discharges of unregulated wastes within or beyond the City's Sphere of Influence. The General Plan update should include a policy that requires the City to conduct site-specific environmental reviews of industrial discharges subject to Regional Board regulation resulting from the General Plan update, and require such industries submit a Report of Waste Discharge to the Regional Board at least 140 days prior to initiating discharge.

Additional Information
If construction activities related to projects considered in the updated General Plan will disturb one acre or more, compliance with the National Pollutant Discharge Elimination System (NPDES) General Permit No. CAS000002 for Discharges of Storm Water Associated With Construction Activity will be required for potential discharges to surface waters, including ephemeral and intermittent drainages. If applicable, before construction begins, the proponent of such projects must submit a Notice of Intent (NOI) to comply

with the permit, a site map, and appropriate fee to the State Water Resources Control Board and a Storm Water Pollution Prevention Plan (SWPPP) must be prepared. The SWPPP must contain at a minimum all items listed in Section A of the General Permit including descriptions of measures taken to prevent or eliminate unauthorized non-storm water discharges, and both temporary (e.g., fiber rolls, silt fences, etc.) and permanent (e.g., vegetated swales, riparian buffers, etc.) best management practices that will be implemented to prevent pollutants from discharging with storm water into waters of the United States.

If you have any questions regarding this matter, please contact Amy Simpson at (559) 445-6187.

Jo Anne Kipps

JO ANNE KIPPS
Senior Engineer

cc: State Clearinghouse, Sacramento

R:\Reg\Municipal\Projects\Outgoing.04-05\CEQA review\ams Coalinga NOP.doc
N15/E/COALINGA, CITY OF/WWTF/ 5D100101001

County of Fresno
Department of Community Health
Brad Maggy, Director

March 29, 2005

999999999
LU0010046
PE 2600

Bill Skinner
City of Coalinga
c/o Mary B. Reents
1422 Monterey St., Ste C200
San Luis Obispo, CA 93401

Dear Mr. Skinner:

Project Name: NOP Master EIR, City of Coalinga General Plan Update

Thank you for the opportunity to review the above project. The Fresno County Department of Community Health, Environmental Health Division offers no comments at this time. However, the information you requested is as follows:

1. Stephanie Kahl, 1221 Fulton Mall, 3rd Floor, Fresno, CA 93721; (559) 445-3357

2. Retail Food Facilities (California Uniform Retail food Facilities Law)
   Public Swimming Pools & Spas (California Health & Safety Code, Titles 22 & 24)
   Underground Storage Tanks
   Hazardous Materials Business Plans, Hazardous Waste
   Solid Waste Facilities, Liquid Waste Pumping Vehicles
   Employee Housing
   Organized Camps
   Milk Handler/Distributor
   Dog Kennel
   Public Water Systems, Private Water Well Construction & Destruction

3. The information in the EIR would not necessarily be used for permit issuance. Additional information would be required at such time that an application for a Permit to Operate was submitted.

4. None at this time.

5. None at this time.

6. None at this time.

7. None at this time.

This Department looks forward to reviewing future environmental documents related to this project. If you have any questions, you may contact me at (559) 445-3357.

Sincerely,

Kathleen Boyer, R.E.H.S.
Environmental Health Specialist III
Environmental Health Division

kb

San Joaquin Valley
Air Pollution Control District

March 29, 2005

Reference No. C20050132

Mr. Bill Skinner
Coalinga Community Development Director
C/o Mary B. Reents
Morro Group, Inc.
1422 Monterey Street, Suite C200
San Luis Obispo, CA 93401

Subject: Coalinga 2025 General Plan Update Master Environmental Impact Report

Dear Mr. Skinner:

The entire San Joaquin Valley Air Basin is designated non-attainment for ozone and fine particulate matter (PM10 and PM2.5). The development of the Coalinga General Plan area would contribute to the overall decline in air quality due to increased traffic and ongoing operational emissions. The District recommends that the air quality section of an Environmental Impact Report (EIR) contain 4 main components. The following describes each section and provides information necessary to complete an EIR from an air quality perspective:

The District recommends that the air quality section of the EIR have four main components:

1. **Description of the regulatory environment and existing air quality conditions impacting the area**. The District has several sources of information available to assist with the existing air quality and regulatory environment section of the EIR. The District's *Guide for Assessing and Mitigating Air Quality Impacts, 2002 Revision* (GAMAQI) contains discussions regarding the existing air quality conditions and trends of the San Joaquin Valley Air Basin, including those pollutants of particular concern: ozone, PM10, and carbon monoxide. In addition, it provides an overview of the regulatory environment governing air quality at the federal, state, and regional levels. The GAMAQI provides air monitoring data and other relevant information for PM-10 and other pollutants. The most recent air quality data for the District is Available at the California Air Resources Board (ARB) website at-http://www.arb.ca.gov/html/aqe&m.htm. The air quality section of EPA's Region 9 (which includes information on the San Joaquin Valley Air Basin) can be found at http://www.epa.gov/region09/air/index.html. Additionally, this section should also contain a discussion regarding growth projections from the City of Coalinga provided to the District (through Fresno COG) for inclusion in the Ozone and PM10 Attainment Plans and any impacts this project will have on Federal Conformity for Fresno County and the San Joaquin Valley Air Basin.

2. **Estimates of existing emissions and projected pollutant emissions related to the increase in project source emissions and vehicle use, along with an analysis of the effects of these increases.** The EIR should include the methodology, model assumptions, inputs and results for pollutant emissions. The cumulative impact analyses should consider current existing and planned development both within the project area and in surrounding areas. The EIR needs to address the short-term and long term local and regional adverse air quality impacts associated with the operation of construction equipment (reactive organic gases, nitrogen oxides, carbon monoxide, and PM10) and emission generated from stationary and mobile sources.

The GAMAQI describes methods for estimating project emissions in some detail. The following summarizes this information. Growth-inducing and cumulative impact analyses should take into consideration the existing and planned development both within the project area and in the surrounding areas. For large projects and plans, the District recommends the use of the Direct Travel Impact Model (DTIM) modeling program to calculate the ozone precursor emissions resulting from the buildout of this project. If URBEMIS 2002 modeling is used in place of DTIM, the District should be consulted regarding settings and assumptions. The URBEMIS 2002 program is used to calculate project area and operational emissions and to identify mitigation measures that reduce impacts. URBEMIS can be downloaded from the South Coast Air Quality Management District's website at: http://www.aqmd.gov/ceqa/urbemis.html.

Results of the traffic study should be used to identify intersections and corridors requiring carbon monoxide (CO) hot spot analysis. Initial CO screening may be conducted using a protocol developed by the Institute of Transportation Studies at University of California Davis entitled Transportation Project-Level Carbon Monoxide Protocol. Locations that are predicted by the local traffic model to experience high levels of traffic congestion should be modeled using the dispersion model CALINE4.

There should be a discussion of the toxic risk associated with diesel-fueled engines and vehicles. The ARB has designated diesel particulate emissions as a toxic air contaminant. The proposed project should be analyzed to see if it is considered near a location of sensitive receptors and if diesel toxicity is a potential source of concern. On page 43 of the GAMAQI, the District addresses and defines sensitive receptors with respect to CEQA. If the project is near sensitive receptors and diesel toxicity is a concern the project developer should perform Hazardous Risk Assessment (HRA). A HRA needs to address the following

- Heavy Duty diesel truck travel
- Heavy duty diesel truck idling
- Truck refrigeration units (TRU)
- IC engines located on the project premises not requiring a District Permit.

The location of sensitive receptors should be explained in terms that demonstrate the relationship between the project site and potential air quality impacts (e.g., proximity, topography, or upwind and downwind location).

3. **Identify and discuss all existing District regulations that apply to the project**. The EIR should identify and discuss all existing District regulations that apply to the project. It would be appropriate to discuss proposed rules that are being developed that would apply to the project. Current rules and regulations are available on the District's website at http://www.valleyair.org/rules/1ruleslist.htm. District rules and regulations are periodically revised, and new regulations are promulgated. The District strongly advises the City to contact the District for any rule updates and new rules when the project development begins. Current District rules and regulations applicable to the proposed project are requirements.

   Based on the information provided, the proposed project and future development resulting from the proposed project will be subject to the following District rules. The following items are rules that have been adopted by the District to reduce emissions throughout the San Joaquin Valley, and are required.

   Regulation VIII (Fugitive PM10 Prohibitions)- Regulation VIII (Rules 8011-8081) is a series of rules designed to reduce PM10 emissions (predominantly dust/dirt) generated by human activity, including construction, road construction, bulk materials storage, landfill operations, etc. The attached Compliance Assistance Bulleting (CAB) highlights many of the requirements contained within Regulation VIII. The CAB is not meant to be all-inclusive, but it can be a useful compliance aid in the field and office alike.

   Rule 2201 (New and Modified Stationary Source Review Rule) This rule applies to all new stationary sources and all modification of existing stationary sources which are subject to the District permit requirements and after construction emit or may emit one or more affected pollutant. The applicant must contact the District's Small Business Assistance (SBA) Office at **(559) 230-5888** to receive additional information/instructions.

Rule 4002 (National Emission Standards for Hazardous Air Pollutants). Prior to any demolition activity, an asbestos survey of existing structures on the project site may be required to identify the presence of any asbestos containing building material (ACBM). Any identified ACBM having the potential for disturbance must be removed by a certified asbestos-contractor in accordance with CAL-OSHA requirements. If you have any questions concerning asbestos related requirements, please contact Mr. Dwayne England of this office at (559) 230-5973, or contact CAL-OSHA at (559) 454-1295. An Asbestos Requirements Bulletin has been enclosed for the applicant.

Rule 4102 (Nuisance) applies to any source operation that emits or may emit air contaminants or other materials. In the event that the project or construction of the project creates a public nuisance, it could be in violation and be subject to District enforcement action.

Rule 4103 regulates the burning of agricultural material. Agricultural material may not be burned if the land use is converting from agriculture to nonagricultural purposes. In the event that the project burns agricultural material, it would be in violation of Rule 4103 and be subject to District enforcement action.

Rule 4601 (Architectural Coatings) limits volatile organic compounds from architectural coatings. This rules specifies architectural coatings storage, clean up and labeling requirements.

Rule 4641 (Cutback, Slow Cure, and Emulsified Asphalt, Paving and Maintenance Operations). If asphalt paving will be used, then paving operations of this project will be subject to Rule 4641. This rule applies to the manufacture and use of cutback asphalt, slow cure asphalt and emulsified asphalt for paving and maintenance operations.

Rule 4901 (Wood Burning Fireplaces and Wood Burning Heaters) limits PM10 and PM2.5 emissions from residential development. Construction plans for residential developments may be affected by section 5.3, specifically:

> *§5.3 Limitations on Wood Burning Fireplaces or Wood Burning Heaters in New Residential Developments.*
> *Beginning January 1, 2004,*
> *5.3.1 No person shall install a wood burning fireplace in a new residential development with a density greater than two (2) dwelling units per acre.*
> *5.3.2 No person shall install more than two (2) EPA Phase II Certified wood burning heaters per acre in any new residential development with a density equal to or greater than three (3) dwelling units per acre.*
> *5.3.3 No person shall install more than one (1) wood burning fireplace or wood burning heater per dwelling unit in any new residential development with a density equal to or less than two (2) dwelling units per acre.*

More information about Rule 4901 can be found at our website- www.valleyair.org. For compliance assistance, please contact Mr. Wayne Clarke, Air Quality Compliance Manager, at 230-5968.

Rule 4902 (Residential Water Heaters) limits emission of NOx from residential developments

This project may be subject to additional District Rules not enumerated above. To identify additional rules or regulations that apply to this project, the applicant is strongly encouraged to contact the District's Small Business Assistance Office at (559) 230-5888.

Components of this project may be subject to the permitting requirements of the District and require a Permit to Operate (PTO). Any equipment subject to the District's PTO requirements must obtain an Authority to Construct (ATC) from the District. Construction of equipment, which requires an ATC, and intimately related appurtenances such as foundations and utility hookups for the equipment, cannot begin until an ATC is obtained. Construction of equipment not

requiring a District permit is not subject to this ATC requirement. Depending upon the nature and complexity of the application and staff workload, ATC approval can take several months. For further information, the applicant should contact the District's SBA Office at **(559) 230-5888**, or our Permit Services Section at **(559) 230-5900**. To avoid unnecessary delays in the project, applications should be submitted to the District as soon as the project developer has determined the scope of the project.

4. **Identify and discuss all feasible measures that will reduce air quality impacts generated by the project.** Site design, equipment alternatives, construction and operational measures that would reduce emissions should be identified. It should identify which mitigation measures will be included in the project, and how each mitigation measure will be implemented. This section should provide an analysis of existing mass transit/bicycle access to or near the site, and discuss if additional infrastructure will be needed. It should also analyze opportunities to mitigate urban heat island effects. The reduction of air quality impacts from implementation of mitigation measures should be quantified when possible. The EIR should discuss how the project design would encourage alternative transportation (including car pool parking), pedestrian and bicycle access/infrastructure, smart growth design, energy efficient project and building design, reduce urban heat island impacts, and business programs that further reduce air pollution in the valley (such as carpooling).

   To help Local Agencies develop their General Plans the District has developed *Air Quality Guidelines for General Plans.* The approach of the *Air Quality Guidelines* is to encourage local agencies to use their land use and transportation planning authority to develop long-range community plans that result in vehicle trip reduction. This document contains goals, policies, and programs that when adopted by local agencies in to general plans will reduce vehicle trips and miles traveled and improve air quality

   Mitigation measures must be included in the EIR that reduce the emissions of reactive organic gases, nitrogen oxides, and PM10 to the fullest extent possible. Site design and building construction measures that would reduce air quality impacts should be included. The District's *Guide for Assessing and Mitigating Air Quality Impacts* (GAMAQI) describes these features. The current GAMAQI can be found at:
   http://www.valleyair.org/transportation/ceqa_guidance_documents.htm. The Local Government Commission (LGC) website, http://www.lgc.org, contains valuable information and resources on subjects from street design to energy efficiency, including a discussion on compact development in the San Joaquin Valley.

   The District encourages innovation in measures to reduce air quality impacts. There are a number of features that could be incorporated into the design/operation of this project to provide additional reductions of the overall level of emissions. (Note: Some of the measures may already exist as City development standards. Any measure selected should be implemented to the fullest extent possible.) The suggestions listed below should not be considered all-inclusive and remain options that land-use authority should consider:

   - Trees should be carefully selected and located to protect the building(s) from energy consuming environmental conditions, and to shade paved areas. Trees should be selected to shade paved areas that will shade 50% of the area within 15 years. Structural soil should be used under paved areas to improve tree growth.
     For Structural Soil see http://www.hort.cornell.edu/uhi/outreach/csc/
     For Tree Selection see http://www.ufei.org/
     For Urban Forestry see http://www.coolcommunities.org http://wcufre.ucdavis.edu
     http://www.lgc.org/bookstore/energy/downloads/sjv_tree_guidelines.pdf

   - If transit service is available to the project site, improvements should be made to encourage its use. If transit service is not currently available, but is planned for the area in the future, easements should be reserved to provide for future improvements such as bus turnouts, loading areas, route signs and shade structures. Appropriations made to facilitate public or mass transit will help mitigate trips generated by the project. Direct pedestrian access to the

main entrance of the project from existing or potential public transit stops and provide appropriately designed sidewalks. Such access should consist of paved walkways or ramps and should be physically separated from parking areas and vehicle access routes.

- Multi-story parking facilities should be considered instead of parking lots to reduce exposed concrete surface and save green space. Large expanses of exposed concrete in parking lots exacerbate the "heat island" effect as well as widen the distance patrons and employees must cross. "Heat islands" created by this and similar projects contribute to the reduced air quality in the valley by heating ozone precursors. Heat mitigation should be considered for this project. Parking facilities allow more patrons to park closer to the multiple desired destinations and provide a cool and protected place to park. Space not used by the parking facility can be used to concentrate units, as park space or as a 'special attraction' space such as fountains or unique units. While the initial cost of a multi-story parking facility may seem cost prohibitive, investments in smart planning increase safety, increase usable area and decrease land waste by reserving areas not used for parking for future growth or special use. Alternatively, parking may be incorporated into the structure by building parking as the first floor or as a basement level.

- The District encourages the applicant and fleet operators using the commercial, industrial and institutional facilities to take advantage of the District's Heavy-Duty Engine program to reduce project emissions. The Heavy Duty program provides incentives for the replacement of older diesel engines with new, cleaner, fuel-efficient diesel engines. The program also provides incentives for the re-power of older, heavy-duty trucks with cleaner diesel engines or alternative fuel engines. New alternative fuel heavy-duty trucks also qualify. For more information regarding this program contact the District at (559) 230-5858 or visit our website at http://www.valleyair.org/transportation/heavydutyidx.htm.

- Sidewalks and bikeways should be installed throughout as much of the project as possible and should be connected to any nearby existing and planned open space areas, parks, schools, residential areas, commercial areas, etc., to encourage walking and bicycling. Connections to nearby public uses and commercial areas should be made as direct as possible to promote walking for some trips. Pedestrian and bike-oriented design reduces motor vehicle usage and their effects on air quality. Sidewalks and bikeways should be designed to separate pedestrian and bicycle pathways from vehicle paths. Sidewalks and bikeways should be designed to be accommodating and appropriately sized for anticipated future pedestrian and bicycle use. Such pathways should be easy to navigate, designed to facilitate pedestrian movement through the project, and create a safe environment for all potential users (pedestrian, bicycle and disabled) from obstacles and automobiles.

- As many energy conserving and emission reducing features as possible should be included in the project. Energy conservation measures include both energy conservation through design and operational energy conservation. Examples include (but are not limited to):
  - Increased energy efficiency (above California Title 24 Requirements) See http://www.energy.ca.gov/title24/.
  - Energy efficient widows (double pane and/or Low-E)
  - Use Low and No-VOC coatings and paints. See South Coast's site for No-VOC Coatings at http://www.aqmd.gov/business/brochures/zerovoc.html
  - High-albedo (reflecting) roofing material. See http://eetd.lbl.gov/coolroof/
  - Cool Paving. See http://www.harc.edu/harc/Projects/CoolHouston/ http://eande.lbl.gov/heatisland/
  - Radiant heat barrier. See http://www.eere.energy.gov/consumerinfo/refbriefs/bc7.html
  - Energy efficient lighting, appliances, heating and cooling systems. See http://www.energystar.gov/
  - Install solar water-heating system(s)
  - Install photovoltaic cells
  - Install geothermal heat pump system(s)
  - Programmable thermostat(s) for all heating and cooling systems
  - Awnings or other shading mechanism for windows
  - Porch, patio and walkway overhangs

- Ceiling fans, whole house fans
- Utilize passive solar cooling and heating designs. (e.g. natural convection, thermal flywheels) See http://www.eere.energy.gov/RE/solar_passive.html
- Utilize daylighting (natural lighting) systems such as skylights, light shelves, interior transom windows etc. See http://www.advancedbuildings.org
- Electrical outlets around the exterior of the unit(s) to encourage use of electric landscape maintenance equipment
- Bicycle parking facilities in commercial, industrial, institutional and multi-family sites. Construct paths to connect the development to nearby bikeways or sidewalks. See http://www.vtpi.org/tdm/tdm85.htm
- Exits to adjoining streets should be designed to reduce time to re-enter traffic from the project site

Specifically for commercial, industrial and institutional land uses:

- Employee shower and locker areas for bicycle and pedestrian commuters.
- On-site employee cafeterias or eating areas
- Low or non-polluting landscape maintenance equipment (e.g. electric lawn mowers, reel mowers, leaf vacuums, electric trimmers and edgers, etc.)

Specifically for residential land uses:

- Pre-wire the unit(s) with high speed modem connections/DSL and extra phone lines
- Natural gas fireplaces (instead of wood-burning fireplaces or heaters)
- Natural gas lines (if available to this area) and electrical outlets in backyard or patio areas to encourage the use of gas and/or electric barbecues
- Low or non-polluting incentives items should be provided with each residential unit (such items could include electric lawn mowers, reel mowers, leaf vacuums, gas or electric barbecues, etc.)

More information can be found at: http://www.consumerenergycenter.org/index.html http://www.lgc.org, http://www.sustainable.doe.gov/, http://www.ciwmb.ca.gov/GreenBuilding/

- Project design should use models put forward by the Local Government Commission (LGC) in the "Smart Growth Guidebook," such as; street block patterns that form an interconnected grid, short block faces, numerous alleys and narrow streets. The LGC website http://www.lgc.org contains valuable information and resources on subjects from street design to energy efficiency.

- For commercial, industrial and institutional land uses, the applicant/tenant(s) should implement measures to reduce the amount of vehicle traffic to and from the project area that further reduce air pollution in the valley. This could include such provisions as encouraging employees to rideshare or carpool to the project site, preferential parking spaces for employees who participate in carpooling or vanpooling, incorporating a compressed workweek schedule, or incentives for employees who use alternative transportation. Check out the "Spare the Air" section of our website www.valleyair.org

- For commercial, industrial and institutional land uses, the applicant/tenant(s) should require that all diesel engines be shut off when not in use on the premises to reduce emissions from idling. The applicant should install equipment that provides amenities that would otherwise be powered by idling engines. An example of such technology includes *IdleAire*. See http://www.idleaire.com/.

- For residential land uses, the applicant should implement measures to reduce the amount of vehicle traffic to and from the project area that further reduce air pollution in the valley. This could include providing an information center for residents to coordinate carpooling. Check out the "Spare the Air" section of our website www.valleyair.org

- The project should include as many clean alternative energy features as possible to promote energy self-sufficiency. Examples include (but are not limited to): photovoltaic cells, solar thermal electricity systems, small wind turbines, etc. Rebate and incentive programs are offered for alternative energy equipment. More information can found at- http://www.dsireusa.org/, http://rredc.nrel.gov/, http://www.energy.ca.gov/renewables/

- Construction activity mitigation measures include:
- Limit traffic speeds on unpaved roads to 15 mph
- Install sandbags or other erosion control measures to prevent silt runoff to public roadways from sites with a slope greater than one percent
- Install wheel washers for all exiting trucks, or wash off all trucks and equipment leaving the site
- Install wind breaks at windward side(s) of construction areas
- Suspend excavation and grading activity when winds exceed 20 mph
- Limit area subject to excavation, grading, and other construction activity at any one time
- Use catalyst equipped diesel construction equipment.
- Minimize idling time (e.g. 10 minute maximum)
- Limit the hours of operation of heavy duty equipment and/or the amount of equipment in use
- Replace fossil-fueled equipment with electrically driven equivalents (provided they are not run via a portable generator set)
- Curtail construction during periods of high ambient pollutant concentrations; this may include ceasing of construction activity during the peak-hour of vehicular traffic on adjacent roadways, and "Spare the Air Days" declared by the District.
- Implement activity management (e.g. rescheduling activities to reduce short-term impacts)
- During the smog season (May through October), lengthen the construction period to minimize the number of vehicles and equipment operating at the same time.
- Construction equipment should have engines that are Tier II (if available as certified by the Air Resources Board). Engines built after 1998 are cleaner Tier II engines. Tier I and Tier II (2.5 gram) engines have a significantly less PM and NOx emissions compared to uncontrolled engines. To find engines certified by the Air Resources Board, see http://www.arb.ca.gov/msprog/offroad/cert/cert.php. This site lists engines by type, then manufacturer. The "Executive Order" shows what Tier the engine is certified as. For more information on heavy-duty engines, please contact Mr. Kevin McCaffrey, Air Quality Specialist, at (559) 230-5831.
- Off road trucks should be equipped with on-road engines when possible.
- Light Duty Cars and Trucks should be alternative fueled or hybrids.
- Minimize obstruction of traffic on adjacent roadways.

District staff is available to meet with you to further discuss the regulatory requirements that are associated with this project. If you have any questions or require further information, please call me at (559) 230-5800 or Mr. Hector R. Guerra, Senior Air Quality Planner, at (559) 230-5820 and provide the reference number at the top of this letter.

Sincerely,

Chrystal Meier

Chrystal Meier
Air Quality Specialist
Central Region

c: file

San Joaquin Valley
Air Pollution Control District

COMPLIANCE ASSISTANCE BULLETIN
October 2004

Fugitive Dust Control at Construction Sites: New Requirements

Regulation VIII, Fugitive PM10 Prohibitions, of the District's Rules and Regulations apply to activities that generate fugitive dust. Fugitive dust is emitted into the air by activities that disturb the soil, such as from earthmoving activities and vehicular/equipment traffic on unpaved surfaces. Windblown dust is also of concern at construction sites.

The District adopted Regulation VIII in 1993 and its most recent amendments became effective on October 1, 2004. This is a basic summary of the regulation's requirements as they apply to construction sites.

Visible Dust Emissions (VDE) may not exceed 20% opacity during periods when soil is being disturbed by equipment or by wind at any time. Visible Dust Emissions opacity of 20% means dust that would obstruct an observer's view of an object by 20%. District inspectors are state certified to evaluate visible emissions. Dust control may be achieved by applying water before/during earthwork and onto unpaved traffic areas, phasing work to limit dust, and setting up wind fences to limit wind blown dust.

Soil Stabilization is required at regulated construction sites after normal working hours and on weekends and holidays. This requirement also applies to inactive construction areas such as phased projects where disturbed land is left unattended. Applying water to form a visible crust on the soil and restricting vehicle access are often effective for short-term stabilization of disturbed surface areas. Long-term methods including applying dust suppressants and establishing vegetative cover.

Carryout and Trackout occur when materials from emptied or loaded vehicles falls onto a paved surface or shoulder of a public road or when materials adhere to vehicle tires and are deposited onto a paved surface or shoulder of a public road. Should either occur, the material must be cleaned up at least daily, and immediately if it extends more than 50 feet from the exit point onto a paved road. The appropriate clean-up methods require the complete removal and cleanup of mud and dirt from the paved surface and shoulder. Using a blower device or dry sweeping with any mechanical device other than a PM10-efficient street sweeper is a violation. Larger construction sites must prevent carryout and trackout from occurring by installing gravel pads, grizzlies, wheel washers, paved interior roads, or a combination thereof at each exit point from the site.

Access and Haul Roads that are unpaved, as well as unpaved vehicle and equipment traffic areas at construction sites must have dust control. Speed limit signs limiting vehicle speed to 15 mph or less at construction sites must be posted every 500 feet.

Storage Piles and Bulk Materials have handling, storage, and transportation requirements that include applying water when handling materials, wetting or covering stored materials, and installing wind barriers to limit VDE. Also, limiting vehicle speeds, loading haul trucks with a freeboard of six inches or greater along

with applying water to the top of the load, and covering the cargo compartments are effective measures for reducing VDE and carryout from vehicles transporting bulk materials.

Demolition activities require the application of water to the exterior of the buildings and to unpaved surfaces where materials may fall. Consider all structures slated for demolition as possibly being regulated because of asbestos, per District Rule 4002 - *National Emission Standards for Hazardous Air Pollutants*. Contact the District well before starting because a 10 working day notice will likely be required before a demolition can begin.

Dust Control Plans identify the dust sources and describe the dust control measures that will be implemented before, during, and after any dust generating activity for the duration of the project. Owners or operators are required to submit plans to the District if, at anytime, the project involves:

- Residential developments of ten or more acres of disturbed surface area.
- Non-residential developments of five or more acres of disturbed surface area.
- Relocating more than 2,500 cubic yards per day of materials on at least three days.

Construction activities may not commence until the District has approved the Dust Control Plan.

Notification by owners or operators of construction projects that are at least one acre in size and where a Dust Control Plan is not required, must provide written notification to the District at least 48 hours in advance of any earthmoving activity.

Record Keeping is required to document compliance with the rules and must be kept for each day any dust control measure is used. The District has developed record forms for water application, street sweeping, and "permanent" controls such as applying long term dust palliatives, vegetation, ground cover materials, paving, or other durable materials. Records must be kept for one year after the end of dust generating activities (Title V sources must keep records for five years).

Exemptions exist for several activities. Those occurring above 3,000 feet in elevation are exempt from all Regulation VIII requirements and Rule 8021 – *Construction, Demolition, Excavation, Extraction, and Other Earthmoving Activities* exempts the following construction and earthmoving activities:

- Blasting activities permitted by California Division of Industrial Safety.
- Maintenance or remodeling of existing buildings provided the addition is less than 50% of the size of the existing building or less than 10,000 square feet (due to asbestos concerns, contact the District at least two weeks ahead of time).
- Additions to single family dwellings.
- The disking of weeds and vegetation for fire prevention on sites smaller than ½ acre.
- Spreading of daily landfill cover to preserve public health and safety and to comply with California Integrated Waste Management Board requirements.

Nuisances are prohibited at all times because District Rule 4102 – *Nuisance* applies to all construction sources of fugitive dust, whether or not they are exempt from Regulation VIII. It is important to monitor dust-generating activities and implement appropriate dust control measures to limit the public's exposure to fugitive dust.

For more information please contact the Compliance Division of the District office nearest to you. Information on Regulation VIII, where you may obtain copies of record keeping forms, the Dust Control Plan template, and the Construction Notification form, is available on the District's website at:

www.valleyair.org

Staking

Newly planted trees usually require some extra help before they are rooted in. Many things can be used as tree ties: pieces of old hose with a rope threaded through, strong plastic strips, canvas strips, even strips of old tires (found at hardware and nursery stores.) Stakes can be metal or wood, as long as it can support the weight of the tree in wind.

- Place stakes just outside the area that was disturbed by planting.
- For a tree that has a strong trunk, only the roots need supported. Tie the stakes to the tree about one foot above ground to support the root mass while the tree is 'rooting in'.
- For tree that has a weak trunk, tie higher up on the tree to support the trunk in wind. The tree should still be able to wiggle in the wind. This helps the trunk of the tree grow stronger.
- The ties should be examined and adjusted as needed to avoid damage to the bark and 'girdling'- When the trunk growth bulges around the ties.

Pruning

Most trees require only the three D's to be pruned: Dead, Diseased, Damaged.

Consult a Gardening book (such as books by Sunset, or Ortho) for individualized information for your trees.

Never 'top' a tree- reducing the height of a mature tree by sawing off the top limbs. This results in large wounds and a thick tangle of weak shoots. A good arborist will not top a tree.

Terms

Bare Root- Trees, usually sold in early spring, that have the soil removed from around the roots.

Deciduous- A tree that naturally looses all its leaves during dormancy.

Dormancy- The annual time when growth slows or ceases. Usually during harsh conditions such as winter or dry summer.

Evergreen- A tree that retains its leaves year-round. An evergreen tree may still have a yearly leaf-drop or shed.





San Joaquin Valley Air Pollution Control District

SJVAPCD

Central Region Office
1990 East Gettysburg Avenue
Fresno, CA 93726-0244

Phone: (559) 230-6000
Fax: (559) 230-6061
www.vallyair.org

SJVAPCD

PLANTING TREES

SPARE the AIR



Tel: (559) 230-6000

Reasons to Plant Trees

We all know trees are important. They make oxygen and help filter particulates and carbon dioxide out of the air. But did you know that having two twenty-five foot tall trees on the west side of a home and one on the east– a person could save $100 on their energy bill each year? Computer modeling for an energy efficient home in Fresno has shown that strategic planting can result in $103 in annual energy savings.

Trees help out by:



Tree Savings

- Shading the house and 'hot-spots' such as driveways and patios.
- Shading the air conditioner to reduce its energy use.
- Cooling ambient air up to 5 degrees F.
- Absorbing pollutants.
- Reducing ozone levels.

Trees are beneficial in other areas:

- Help reduce storm water runoff
- Increase property value (people are willing to pay 3-7% more for properties that have attractive large trees.)

Location Guidelines

Location

- To maximize summer shade and minimize winter shade, locate deciduous trees about 10-20 ft south and west of the home.
- Keep trees at least 5-10 ft from the home to avoid foundation damage.
- Shade patios and driveways, which are heat sinks, to make the area cooler and more comfortable.
- Shade the air conditioner to reduce its energy use, but do not plant so close that it will obstruct the flow of air around the unit.
- Plant only trees with a short mature height where there are power lines. Do not plant directly above underground water or sewer lines. Contact your utility company before planting.
- Create a winter windbreak on the north side of the home by planting a row of evergreen trees perpendicular to the winter wind. The row should be longer than the building and 25-50 feet away. Trees chosen should have a mature height of at least twice as tall as the building.



Planting

Fall and winter are ideal planting times in the valley. Trees are dormant and the weather is cool. Dig a hole twice as wide and just as deep as the pot that the tree came in. Dig through hardpan and remove junk soil. Line the bottom of the hole with gravel or soil. Loosen the outer roots of the tree by hand. Place the tree into the hole and make sure that the top of the root mass is even with the ground (DON'T bury the trunk.) Mix compost in with the soil as you fill in around the roots. Use the handle of the shovel to 'poke' any air pockets that may form as the hole fills in. Firm the soil and finish with a 'moat'. Water well. Trees need water even in winter.

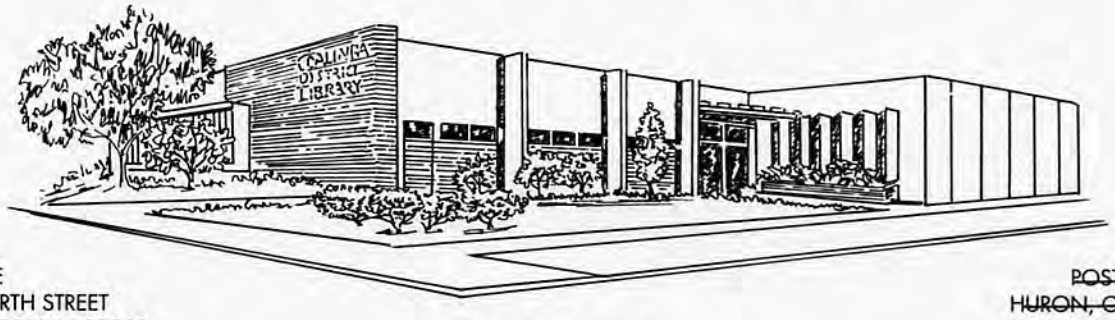


Planting for the future

SJVAPCD

Central Region Office
1990 East Gettysburg Avenue
Fresno, CA 93726-0244
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www.vallyair.org

COALINGA-HURON LIBRARY DISTRICT



BUSINESS OFFICE
305 NORTH FOURTH STREET
COALINGA, CALIFORNIA 93210
559/935-1676
FAX 559/935-1058

~~POST OFFICE BOX 190~~
~~HURON, CALIFORNIA 93234~~
~~559/945-2284~~
~~FAX 559/945-2855~~

March 24, 2005

Mr. Bill Skinner
Coalinga Community Development Director
C/o Mary B. Reents
Morro Group, Inc.
1422 Monterey Street, Suite C200
San Luis Obispo, CA 93401

RE: Response to Notice of Preparation of a Master Environmental Impact Report of the City of Coalinga General Plan Update.

Dear Mr. Skinner:

Our District Board of Trustees has discussed developer fees for sometime and with the City of Coalinga's General Plan Update of 2005 we feel it is imperative to secure funding on new homes. Recently we have seen an impact on our facilities due to the P.V.S.P. and Coalinga State Hospital.

Several factors have reduced our District's revenue over the past twenty years which have caused a hardship. Lower land valuation and Redevelopment fees have taken a toll on our budget. Participation in the Fresno County Sales tax has allowed us to survive without laying off personnel and closing more days. That funding source is finite. Our property taxes alone will not keep our libraries open.

Please note in your General Plan Update that our District is researching other districts' developer fees so we can arrive at a fair charge.

Please use my name as the contact person.

Sincerely,

Carol Kreamer

Carol Kreamer
Interim District Librarian

APPENDIX B

- Biological Resources Background Information

TABLE B-1
Listed and Proposed Sensitive Plant Species Potentially Occurring in the Project Area

Species	Status Fed. / State / CNPS	Habitat Description
PLANTS		
Heartscale *Atriplex cordulata*	-- / -- / 1B.2	Chenopod scrub, valley and foothill grassland, meadows, alkaline flats in the Central Valley; sandy soils; 1-150(600) m.
Brittlescale *Atriplex depressa*	-- / -- / 1B.2	Chenopod scrub, meadows, playas, valley and foothill grassland, vernal pools; usually in alkali scalds or alkaline clay in meadows or annual grassland; rarely associated with riparian habitats, marshes, or vernal pools; 1-320 m.
Lesser saltscale *Atriplex minuscula*	-- / -- / 1B.1	Chenopod scrub, meadows, playas, and valley and foothill grassland; in alkaline sinks and grasslands; sandy, alkaline soils; 20-100 m.
Lost Hills crownscale *Atriplex vallicola*	-- / -- / 1B.2	Chenopod scrub, valley and foothill grassland, vernal pools; alkaline soils; 50-635 m.
Dwarf calycadenia *Calycadenia villosa*	-- / -- / 1B.1	Chaparral, cismontane woodland, valley and foothill grassland, meadows and seeps; open, dry meadows, hillsides, gravelly outwashes; 251-1,275 m.
California jewel-flower *Caulanthus californicus*	FE / SE / 1B.1	Chenopod scrub, valley and foothill grassland, pinyon juniper woodland; historical from various valley habitats in both the Central Valley and Carrizo Plain; 65-900 m.
Hall's tarplant *Hemizonia (Deiandra) halliana*	-- / -- / 1B.1	Cismontane woodland, chenopod scrub, valley and foothill grassland; reported from a variety of substrates including clay, san, and alkaline soils; 300-950 m.
Recurved larkspur *Delphinium recurvatum*	-- / --/ 1B.2	Chenopod scrub, valley and foothill grassland, cismontane woodland; many historical and degraded sites; on alkaline soils, often in valley saltbush or valley chenopod scrub; 3-685 m.
Hoover's woolly-star[1] *Eriastrum hooveri*	--/ -- / 4.2	Chenopod scrub, pinyon and juniper woodland, valley and foothill grassland; on sparsely vegetated alkaline alluvial fans, also in the temblor range on sandy soils; 50-915 m.
Pale-yellow layia *Layia heterotricha*	-- / -- / 1B.1	Pinyon and juniper woodland, valley and foothill grassland; many historical extirpated occurrences; alkaline or clay soils, open areas; 270-1,365 (2,675) m.

Species	Status Fed. / State / CNPS	Habitat Description
San Joaquin woolly-threads *Lembertia congdonii*	FE / -- / 1B.2	Chenopod scrub and valley and foothill grassland; endemic to San Joaquin Valley; alkaline or loamy plains, sandy soils, often with grasses and within chenopod scrub; 60-800 m.
Showy madia *Madia radiata*	-- / -- / 1B.1	Valley and foothill grassland, cismontane woodland, chenopod scrub; mostly on adobe clay in grassland or among shrubs; 25-1125 m.
SENSITIVE HABITATS		
Great Valley mesquite scrub	CNDDB Sensitive Habitat	Open woodland or savanna; low perennial cover (densities of mesquite as low as 2-3 per acre); occurs on sandy loams of alluvial origin, often with wind-modified microtopography.

[1] Hoover's woolly-star formerly federally threatened. Delisted in October 2003.

Plant Status Codes:
FE = Federally Endangered
SE = State Endangered

California Native Plant Society (CNPS):
List 1B = rare, threatened, or endangered in California and elsewhere.
List 4 = limited distribution (watch list)

CNPS Threat Code:
.1 = Seriously endangered in California (over 80% of occurrences threatened / high degree and immediacy of threat)
.2 = Fairly endangered in California (20-80% occurrences threatened)
.3 = Not very endangered in California (<20% of occurrences threatened or no current threats known)

TABLE B-2
Listed and Proposed Sensitive Wildlife Species Potentially Occurring in the Project Area

Species	Status Fed. / State / Other	Habitat Description
INSECTS		
San Joaquin dune beetle *Coelus gracilis*	-- / SA / --	Inhabits fossil dunes along the western edge of San Joaquin Valley; inhabits sites containing sandy substrates.
Redheaded sphecid wasp *Eucerceris ruficeps*	-- / SA / --	Found in central California interior dunes; including areas west of Coalinga; nests in hard-packed sand utilizing abandoned halictine bee burrows.
Hopping's blister beetle *Lytta hoppingi*	-- / SA / --	Inhabits the foothills at the southern end of the San Joaquin Valley, including the vicinity of Coalinga.
Molestan blister beetle *Lytta molesta*	-- / SA / --	Inhabits the foothills at the southern end of the San Joaquin Valley, including the vicinity of Coalinga.
Morrison's blister beetle *Lytta morrisoni*	-- / SA / --	Inhabits the foothills at the southern end of the San Joaquin Valley, including the vicinity of Coalinga.
AMPHIBIANS		
Western spadefoot *Scaphiopus (Spea) hammondii*	-- / CSC / --	Lowlands such as washes, river floodplains, alluvial fans, playas, and alkali flats, as well as some areas into the foothills and mountains; prefers open areas with sparse vegetation and short grasses, where the soil is sandy or gravelly; temporary rain pools with water temperatures between 9°C and 30°C and at least 3 weeks in duration are necessary for reproduction.
REPTILES		
Western pond turtle *Clemmys marmorata*	-- / CSC / --	Inhabits permanent or nearly permanent water in many habitat types below 6,000 ft; highly aquatic turtle of ponds, marshes, rivers, streams, and irrigation ditches with aquatic vegetation; needs basking sites and suitable upland habitat (sandy banks or grassy open fields) for egg-laying.
Blunt-nosed leopard lizard *Gambelia sila*	FE / SE, FP / --	Resident of sparsely vegetated alkali and desert scrub habitats in areas of low topographic relief; seeks cover in mammal burrows, under shrubs, or structures such as fence posts; does not excavate its own burrows.

Species	Status Fed. / State / Other	Habitat Description
San Joaquin coachwhip *Masticophis flagellum ruddocki*	-- / CSC / --	Open, dry habitats with little or no tree cover; found in valley grassland and saltbush scrub in the San Joaquin Valley; needs mammal burrows for refuge and oviposition sites.
Coast (California) horned lizard *Phrynosoma coronatum frontale*	-- / CSC / --	Frequents a wide variety of habitats, most common in lowlands along sandy washes with scattered low bushes; utilizes open areas for sunning; bushes for cover, and patches of loose soil for burial; needs abundant supply of ants and other insects.
BIRDS		
White-tailed kite *Elanus leucurus*	MBTA / FP / --	(Nesting) rolling foothills/valley margins with scattered oaks and river bottomlands or marshes next to deciduous woodland; open grasslands, meadows, or marshes for foraging close to isolated, dense-topped trees for nesting and perching.
Northern harrier *Circus cyaneus*	MBTA / CSC / --	(Nesting) coastal salt and fresh-water marsh; forages in marshes and grasslands, from salt grass in desert sink to mountains; nests on ground in shrubby vegetation, usually at marsh edges; nests built of a large mound of sticks in wet areas.
Golden eagle *Aquila chrysaetos*	MBTA, BGEPA / FP, CSC / --	(Nesting and wintering) rolling foothills, mountain areas, sage-juniper flats, and deserts; cliff-walled canyons provide nesting habitat in most parts of range; also, large trees in open areas.
Prairie falcon *Falco mexicanus*	MBTA / CSC / --	(Nesting) inhabits dry, open terrain, either level or hilly; breeding sites located on cliffs; forages over large distances, even to marshlands and ocean shores.
Swainson's hawk *Buteo swainsoni*	MBTA / ST / --	(Nesting) breeds in stands with few trees in juniper sage flats, riparian areas, and in oak savannah; requires adjacent suitable foraging areas such as grasslands, or alfalfa or grain fields supporting rodent populations; infrequent visitor to CHCP area.
Short-eared owl *Asio flammeus*	MBTA / CSC / --	(Nesting) found in swamps, both fresh and salt, lowland meadows, irrigated alfalfa fields; tule patches and tall grass needed for nesting; nests on dry ground in a depression concealed in vegetation.
Western burrowing owl *Athene cunicularia hypugea*	MBTA / CSC / --	(Burrow sites) open, dry annual or perennial grasslands, deserts and scrublands characterized by low-growing vegetation; subterranean nester; dependent upon burrowing mammals, most notably the California ground squirrel.

Species	Status Fed. / State / Other	Habitat Description
Le Conte's thrasher *Toxostoma lecontei*	MBTA / CSC / --	Desert resident; primarily of open desert wash, desert scrub, alkali desert scrub, and desert succulent scrub habitats; commonly nests in a dense, spiny shrub or densely branched cactus in desert wash habitat, usually 2-8 ft above ground.
Tricolored blackbird *Agelaius tricolor*	MBTA / CSC / --	(Nesting colony) highly colonial species; most numerous in Central Valley and vicinity; largely endemic to California; requires open water, protected nesting substrate and foraging area with insect prey within a few km of the colony.
Loggerhead shrike *Lanius ludovicianus*	MBTA / CSC / --	(Nesting) broken woodlands, savannah, pinyon-juniper, Joshua tree, and riparian woodlands, desert oases, scrub, and washes; prefers open country for hunting, with perches for scanning, and fairly dense shrubs and brush for nesting.
California horned lark *Eremophila alpestris actia*	MBTA / CSC / --	Coastal regions, chiefly from Sonoma County to San Diego County, also the main part of the San Joaquin Valley and east to the foothills; inhabits short-grass prairie, bald hills, mountain meadows, open coastal plains, fallow grain fields, and alkali flats.
Lark sparrow *Chondestes grammacus*	MBTA / SA / --	(Nesting) prefers edges between grasslands and trees or bushes or open grassy oak woodlands; scattered trees or shrubs required for lookouts, song perches, and cover.
MAMMALS		
Various bat species (Order Chiroptera) (roosting)	-- / CSC / --	Roost in trees, caves, mining tunnels, buildings, bridges, and other structures.
San Joaquin antelope squirrel *Ammospermophilus nelsoni*	-- / ST /--	Found in western San Joaquin Valley from 200-1,200 ft elevation on dry, sparsely vegetated loam soils; digs burrows or uses kangaroo rat burrows; needs widely scattered shrubs, forbs, and grasses in broken terrain with gullies and washes.
San Joaquin pocket mouse *Perognathus inornatus inornatus*	-- / SA / --	Typically found in saltbush scrub, grasslands, and blue oak savannas; needs friable soils.
Giant kangaroo rat *Dipodomys ingens*	FE / SE / --	Inhabits annual grasslands on the western side of the San Joaquin Valley; alkali scrub is occasional habitat; needs level terrain and sandy loam soils for burrowing.
Short-nosed kangaroo rat *Dipodomys nitratoides brevinasus*	-- / CSC / --	Found on western side of the San Joaquin Valley in grassland and desert shrub associations; occurs in alkaline soils; needs friable soils; favors flat to gently sloping terrain.

Species	Status Fed. / State / Other	Habitat Description
Tulare grasshopper mouse *Onychomys torridus tularensis*	-- / CSC / --	Inhabits hot, arid valleys and scrub deserts in the southern San Joaquin Valley; feeds almost exclusively on arthropods; needs abundant supply of insects.
San Joaquin kit fox *Vulpes macrotis mutica*	FE / ST / --	Inhabits annual grasslands or grassy open stages with scattered shrubby vegetation; needs loose-textured sandy soils for burrowing, and suitable prey base.

Wildlife Status Codes:
FE = Federally Endangered
MBTA = Federal Migratory Bird Treaty Act
BGEPA = Bald and Gold Eagle Protection Act
SE = State Endangered
ST = State Threatened
FP = Fully Protected
CSC = Special Concern Species
SA = CNDDB Special Anima

APPENDIX B
Special Status Species with Suitable Habitat in the Study Area

A. SPECIAL-STATUS PLANT SPECIES

1. Heartscale (*Atriplex cordulata*)

Heartscale is an annual herb in the Chenopodiaceae (goosefoot) family that is endemic to California. It occurs in chenopod (saltbush) scrub, meadows and seeps, and valley and foothill grassland, in saline or alkaline soils. The species flowers from April to October. The CNPS considers this species as rare and fairly endangered in California (List 1B.2).

2. Brittlescale (*Atriplex depressa*)

Brittlescale is an annual herb in the Chenopodiaceae (goosefoot) family that is endemic to California and found only in the Central Valley. It occurs in chenopod (saltbush) scrub, meadows and seeps, playas, valley and foothill grassland, and vernal pools in alkaline soils. The species flowers from May to October. The CNPS considers this species as rare and fairly endangered in California (List 1B.2).

3. Lesser saltscale (*Atriplex minuscula*)

Lesser saltscale is an annual herb in the Chenopodiaceae (goosefoot) family that is endemic to California. It occurs in chenopod (saltbush) scrub, meadows, playas, and valley and foothill grassland, in sandy, alkaline soils. The species flowers from May to October. The CNPS considers this species as rare and seriously endangered in California (List 1B.1).

4. Lost Hills crownscale (*Atriplex vallicola*)

Lost Hills crownscale is an annual herb in the Chenopodiaceae (goosefoot) family that is endemic to California. It occurs in chenopod (saltbush) scrub, valley and foothill grassland, and vernal pools, in alkaline soils. The species flowers from April to August. The CNPS considers this species as rare and fairly endangered in California (List 1B.2).

5. Dwarf calycadenia (*Calycadenia villosa*)

Dwarf calycadenia is an annual herb in the Asteraceae (sunflower) family that is endemic to California. It occurs in chaparral, cismontane woodland, meadows and seeps, and valley foothill grassland in rocky soils. The species flowers from May to October. The CNPS considers this species as rare and seriously endangered in California (List 1B.1).

6. California jewel-flower (*Caulanthus californicus*)

California jewel-flower is an annual herb in the Brassicaceae (mustard) family that is endemic to California. It occurs in chenopod scrub, pinyon and juniper woodland, and valley and foothill grassland in sandy soils. The species flowers from February to May. This species is federally and state listed as endangered, and the CNPS considers this species as rare and seriously endangered in California (List 1B.1).

7. Hall's tarplant [*Hemizonia (Deiandra) halliana*]

Hall's tarplant is an annual herb in the Asteraceae (sunflower) family that is endemic to California. It occurs in chenopod scrub, cismontane woodland, and valley and foothill grassland in clay soils. The species flowers from April to May. The CNPS considers this species as rare and seriously endangered in California (List 1B.1).

8. Recurved larkspur (*Delphinium recurvatum*)

Recurved larkspur is an annual herb in the Ranunculaceae (buttercup) family that is endemic to California. It occurs in chenopod scrub, cismontane woodland, and valley and foothill grassland in alkaline soils. The species flowers from March to May. The CNPS considers this species as rare and fairly endangered in California (List 1B.2).

9. Hoover's woolly-star (*Eriastrum hooveri*)

Hoover's woolly-star is an annual herb in the Polemoniaceae (phlox) family that is endemic to California. It occurs in chenopod scrub, pinyon and juniper woodland, and valley and foothill grassland. The species flowers from March to July. The CNPS considers this species as rare and fairly endangered in California (List 4.2).

10. Pale-yellow layia (*Layia heterotricha*)

Pale-yellow layia is an annual herb in the Asteraceae (sunflower) family that is endemic to California. It occurs in cismontane woodland, pinyon and juniper woodland, and valley and foothill grassland in alkaline or clay soils. The species flowers from March to June. The CNPS considers this species as rare and seriously endangered in California (List 1B.1).

11. San Joaquin woolly-threads [*Lembertia (Monolopia)congdonii*]

San Joaquin woolly-threads is an annual herb in the Asteraceae (sunflower) family that is endemic to California. It occurs in chenopod scrub, and valley and foothill grassland in sandy soils. The species flowers from February to May. This species is federally listed as endangered, and the CNPS considers this species as rare and fairly endangered in California (List 1B.2).

12. Showy madia (*Madia radiata*)

Showy madia is an annual herb in the Asteraceae (sunflower) family that is endemic to California. It occurs in cismontane woodland, and valley and foothill grassland. The species flowers from March to May. The CNPS considers this species as rare and seriously endangered in California (List 1B.1).

B. SPECIAL-STATUS WILDLIFE SPECIES

1. Insects

a. San Joaquin dune beetle (*Coelus gracilis*)

The San Joaquin dune beetle occurs in small sand dunes (or on extremely sandy substrates) bordering the western edge of the San Joaquin Valley. All members of the genus *Coelus* are flightless, relatively sessile beetles, which spend much of their time within the substrate (Doyen, 1976). They are brown in coloration and area about four mm in length. The life cycle of *C. gracilis* occurs entirely in the sand, as larval development and pupation also occur there. *C. gracilis* is the smallest member of the genus and can be distinguished from its congeners by the absence of fringing setae on the epistoma (Doyen, 1976). Notably, *C. gracilis* is fairly monomorphic, whereas other members of the genus display marked geographic variation.

Habitat loss through human related activities (e.g., urbanization, agricultural development, and off-road vehicle use) poses the most serious threat to the survival of existing *C. gracilis* populations. Accordingly, survival of the San Joaquin dune beetle is dependent upon the preservation of their small, fragile, and isolated pockets of dune habitat. The degradation of dune habitat by off road vehicle use constitutes an additional threat to this species. The San Joaquin dune beetle is considered a Special Animal by the CNDDB. Occurrence within the Coalinga area includes a site located in the Jacalitos Canyon.

b. Redheaded sphecid wasp (*Eucerceris ruficeps*)

The redheaded sphecid wasp is yellow with black markings and is about on-half inch long. The female has a red head whereas the males head is yellow. This wasp nests in the ground in hard packed sand; it occasionally uses the old nests of halictid beetles. Adults feed on the nectar of flowering plants. Nests are provisioned with paralyzed adult weevils for consumption by the wasp larvae. This species inhabits remnant inland sand dunes and possibly other habitats in Fresno, Stanislaus, and Contra Costa counties. This species is considered a Special Animal by the CNDDB.

c. Hopping's Blister Beetle (*Lytta hoppingi*)

Hopping's blister beetle inhabits the foothills at the southern end of the San Joaquin Valley, including the vicinity of Coalinga (CNDDB, 2006). This beetle is approximately 0.75 inch long, and is black or black with orange to red spots on the head and/or thorax. It parasitizes ground nesting bees. The Hopping's blister beetle feeds on flowers and seed pods of annual forbs. There is very little known about this species. A single CNDDB occurrence record occurs for the vicinity of Coalinga (CNDDB, 2006). This species is considered a Special Animal by the CNDDB.

d. Molestan blister beetle (*Lytta molesta*)

This beetle is approximately one inch long with black and orange markings. Very little is known about the life history or behavior of this species. It has been collected from early April to early July. There is some developmental information available for other species in the genus. Some species in the genus are known to produce 80 to 250 eggs. *Lytta* larvae are nest parasites of solitary bees; the beetle larvae feed on the pollen stores that the female bee has provided for her

own larvae. Some species require only the pollen contents of one bee's larval cell to complete their development, but others need more and attack several cells. In doing so, larvae of these species frequently kill and consume the immature stages of the host bee as well as consuming their pollen stores. This species is considered a Special Animal by the CNDDB.

e. Morrison's blister beetle (*Lytta morrisoni*)

Morrison's blister beetle can be found in the southern Central Valley. Halstead and Haines (1992) report a 1978 record from Panoche Rd., 13.1 km west of I-5 in Fresno County. More recently the species has been collected at Carrizo Plains in San Luis Obispo County in 2003, and four miles west of Earlimont and at Pixley NWR in Tulare County in 2005 (CNDDB, 2006). The species has also been recorded from Kern and San Benito counties. Meloids are frequently encountered on flowers, and *Lytta morrisoni* has been recorded feeding on *Gilia tricolor* and *Linanthus liniflorus* by Haines. There is no information available on the life history or behavior of this species. Meloids are often found in large aggregations on plants near the nesting sites of their host bees. Like the Molestan beetle nest parasites of solitary bees; the beetle larvae feed on the pollen stores that the female bee has provided for her own larvae. Some species require only the pollen contents of one bee's larval cell to complete their development, but others need more and attack several cells. In doing so, larvae of these species frequently kill and consume the immature stages of the host bee as well as consuming their pollen stores. This species is considered a Special Animal by the CNDDB.

2. Amphibians

a. Western spadefoot [Scaphiopus (Spea) hammondii]

Western spadefoot are distinguished from true toads (genus *Bufo*) by their catlike eyes, a single black, sharp-edged "spade" on each hind foot, teeth in the upper jaw, smooth skin, and absent or indistinct parotid glands (Stebbins, 2003). The western spadefoot is medium-sized [3.5 to 6.0 cm snout-vent length(SVL)], with greenish to brownish coloration above, often with four irregular, light stripes on the back, and whitish on the underside. It has pale gold eyes.

Nearly completely terrestrial, the western spadefoot enters water only to breed. It otherwise inhabits underground burrows, primarily in washes, floodplains of rivers, alluvial fans, playas, and alkali flats, and also in foothills and mountains. Optimal habitat consists of open vegetation and short grasses, with sandy or gravelly soils. The western spadefoot digs a burrow in loose soil or uses small mammal burrows, and typically becomes active after rains in the fall or early spring. For breeding, the species uses temporary rain pools that persist for more than three weeks. The pools are often associated with ephemeral streamcourses. During surface activity between late February and late May, females attach egg masses to plant material or submerged rocks in rain pools, and larval development occurs in three to eleven weeks. Successful reproduction occurs in pools that lack fishes, bullfrogs, and crayfish (Jennings and Hayes, 1994). Western spadefoot is considered a CSC species by CDFG.

b. Foothill yellow-legged frog (*Rana boylii*)

The foothill yellow-legged frog is a relatively small true frog. The back is gray, brown, reddish or olive, usually spotted or mottled and harmonizing with the prevailing color of rocks and soil.

The underside of the hind legs and lower abdomen is yellow. Other diagnostic features include a pale triangle on the snout, lack of a well defined dorsolateral fold, and relatively rough, toad-like skin. This frog is generally found in or near water. It inhabits permanent streams and rivers in woodland and forest habitats and is usually found near riffles where there are rocks and sunny banks. When frightened it dives to the bottom and takes refuge among stones, silt and vegetation (Stebbins, 1985). It relies on aquatic invertebrates for most of its diet. It breeds from mid-March to May after the high waters, resulting from spring runoff, have subsided (Stebbins 1985).

The foothill yellow-legged frog ranges west of the Cascades crest in Oregon south to the San Gabriel River in Los Angeles County; and also in the Sierra Nevada foothills and the South Coast Ranges to the Tehachapis. Records from the San Joaquin Valley are scarce; most likely, this species inhabited areas of permanent water in the valley and low foothills that have now been lost to agriculture or urbanization. This species is considered a CSC by the CDFG.

3. Reptiles

a. Western pond turtle (*Clemmys marmorata*)

The western pond turtle has been previously described as northern and southern subspecies that show some morphological differentiation intergrading over a relatively broad range in central California (Seeliger, 1945). Geographic variation suggests that more than one historical unit may be represented within its range in California. Distribution of those units corresponds roughly to subspecific taxa currently recognized as the northwestern pond turtle (*Clemmys marmorata marmorata*) and western pond turtle (*Clemmys marmorata pallida*) (Holland, 1992).

Historically, the western pond turtle had a relatively continuous distribution in most Pacific slope drainages from Washington State along the Columbia River to Arroyo Santo Domingo, northern Baja California (Slater, 1962). In California, the western pond turtle was historically present in most Pacific slope drainages between the Oregon and Mexican borders (Jennings and Hayes, 1994). The known elevation range of the western pond turtle extends from near sea level to approximately 1430 m.

Western pond turtles inhabit quiet waters of ponds, small lakes, streams, and marshes and requires basking sites such as partially submerged logs, rocks, mats of floating vegetation, or open mud banks. They will often inhabit reaches of streams that contain deep pools, with depths greater than three feet (Stebbins, 2003), and are typically found in the largest and deepest pools along streams containing suitable basking sites, including fallen trees and boulders. These turtles tend to congregate along portions of streams containing abundant underwater cover or areas containing escape routes beneath the water surface such as undercut banks, tangles of roots, and submerged logs (Hunt, 1994). Overland movements up to five km have been recorded, and these are thought to be in response to adverse environmental circumstances (e.g., drought), or normal movements within home ranges (Holland, 1994).

Mating occurs during April to May, and three to eleven eggs are laid from March to August within nests constructed in sandy banks. Incubation of eggs may range to approximately three months, with young turtles reaching sexual maturity in about eight years. Western pond turtles are omnivorous, feeding on vegetation, insects, fishes, frogs, and carrion. It is estimated that 80

to 85% of the western pond turtle populations in California have been eliminated primarily due to land conversion, collecting, disease, introduction of non-native predators, urbanization, and flood control practices (Holland, 1994). The western pond turtle is considered a CSC species by CDFG. Western pond turtles are known to occupy Warthan Creek (CNDDB, 2006) and have been observed in a pond just west of the existing WWTP facility (City of Coalinga, 2005). They may also inhabit other aquatic areas such as Jacalitos Creek during periods of high water flow.

b. Blunt-nosed leopard lizard (*Gambelia sila*)

The blunt-nosed leopard lizard is a relatively large lizard, with males ranging from 3.4 to 4.7 inches SVL and female ranging from 3.4 to 4.4 inches SVL. This species is characterized by a short blunt snout, with large hind legs and a long tail. It is grayish to yellowish above, with dark spots typically arranged in rows on each side of the back, and pale crossbands. The throat has pale gray to dusky spots. During breeding season males develop pink, salmon, or rust wash on the throat, chest, and occasionally over most of the body except top and sides of the head. Females during the breeding season develop reddish orange spots and blotches on the head and sides, and reddish orange underneath the upper legs and tail.

Blunt-nosed leopard lizards inhabit semiarid grasslands, alkali flats, and washes of the San Joaquin Valley, and nearby valleys and foothills (Stebbins, 2003). Soil may be sandy, gravelly, loamy, or hardpan. Vegetation often includes bunchgrasses, annual grasses, and saltbush (*Atriplex* spp.). Optimum BNLL activity periods occur when air temperature is between 25C-35C (77F-95F) (Tollestrup, 1979). Females lay one to three clutches of one to six eggs from June to July. Food items include mainly insects and small lizards.

The blunt-nosed leopard lizard is federally and state listed as endangered. The CDFG recognizes the blunt-nosed leopard lizard as a Fully Protected Species under California Fish and Game Code Section 5050, which means no take authorization can be granted for the species, other than for scientific purposes. There are several CNDDB occurrence records for the species in the Coalinga area (CNDDB, 2006).

c. San Joaquin coachwhip (Masticophis flagellum ruddocki)

The San Joaquin coachwhip is a long (90-155cm SVL), thin snake that is typically light yellow, olive brown, or reddish above with a few faint or no neck bands, occasionally light tan below (Stebbins, 2003). Its range extends from Colusa County to the southern San Joaquin Valley (Jennings and Hayes, 1994). This species frequents a variety of habitats, including desert, prairie, scrubland, woodlands, and farmland. The ground surface may be flat or hilly, and the substrate sandy or rocky. The San Joaquin coachwhip is very tolerant of hot, dry conditions, and it is fast moving. Females lay a clutch of four to twenty eggs in June to July. Food items are small mammals, birds, eggs, lizards, snakes, frogs, and insects. The San Joaquin coachwhip is considered a CSC species by CDFG.

d. Coast (California) horned lizard (*Phrynosoma coronatum frontale*)

The California horned lizard or ("coast" horned lizard) is a California endemic. This species historically has a spotty distribution throughout California and is locally uncommon to common in suitable habitat. Original distribution is from Shasta Lake south along the edges of the

Sacramento Valley into the South Coast Ranges, San Joaquin Valley, and Sierra Nevada foothills into northern Los Angeles, Santa Barbara, and Ventura counties (Jennings, 1988).

California horned lizards can be found in elevations from near sea level to approximately 2000 meters. They occupy several habitat types, including scrubland, grassland, coniferous forests, and woodlands (Stebbins, 2003; Tollestrup, 1981). They area common in lowlands along sandy washes with scattered low shrubs, and maximum abundance is seen on sandy loam and alkali flats dominated by iodine bush. Feeding is on the ground generally between shrubs, often between ant colonies. They have also been known to feed on small beetles, wasps, grasshoppers, and flies (Stebbins, 2003). During extended periods of inactivity or winter hibernation this species will utilize small mammal burrows or burrow into loose soil under surface objects (Zeiner et al., 1990). The California horned lizard is generally active from April to October with courtship behaviors noted during April (Tollestrup, 1981). This species is generally diurnal, except for periods of extreme heat during mid summer when it becomes crepuscular (active at dawn and dusk). The California horned lizard is considered a CSC by CDFG.

4. Birds

a. White-tailed kite (*Elanus leucurus*)

The white-tailed kite is a small to medium-sized, white bird of prey that ranges throughout valley and coastal lowlands in California, and most commonly, near agricultural areas. Nesting and roosting occurs in dense, broad-leafed deciduous groves of trees. Breeding occurs from February-October, peaking in May-August. Eggs (typically four to five) are incubated for about 28 days, with the young subsequently fledging 35-40 days thereafter. Two broods per year may be produced. White-tailed kites prey chiefly on voles and other small diurnal mammals, and occasionally on birds, insects, amphibians, and reptiles. The white-tailed kite is protected by the Migratory Bird Treaty Act (MBTA) and is a California fully protected species.

b. Northern harrier (*Circus cyaneus*)

The northern harrier is a medium-sized, relatively slender hawk that is most easily recognized by its conspicuous white rump. Wings are comparatively long, as in falcons, but are more rounded. This raptor is unusual in that sexual dichromatism is pronounced: females are mostly brown above and white with brown streaks below, whereas males are generally grayish above, white below, and the wing tips are black. Also diagnostic is the erratic flight of leisurely wing beats and swift glides, usually low to the ground, and wing tips up-turned. Harriers also often perch close to the ground.

Northern harriers range throughout North America, and in California they are usually year-round residents (some southern California birds may be over-winter visitors). Formerly known as the marsh hawk, these birds primarily inhabit marshes, fields, and prairies. Diet consists primarily of small rodents, though frogs, reptiles, and insects are also taken (Bent, 1961). This species is considered a CSC by the CDFG.

c. Golden eagle (Aquila chrysaetos)

The golden eagle is a large golden-brown eagle that is an uncommon, permanent resident and migrant throughout California, except the center of the Central Valley (Zeiner et al., 1990). It requires open terrain for hunting, including grasslands, deserts, savannahs, and early successional stages of forest and shrub habitats. The golden eagle nests on cliffs of all heights and in large trees in open areas. Alternative nest sites are maintained, and old nests are reused. It builds a large platform nest of sticks, twigs, and greenery. Rugged, open habitats with canyons and escarpments are used most frequently for nesting.

The golden eagle breeds from late January through August; with a peak in March through July. Clutch size ranges from one to three, with usually two. Eggs are laid early February to mid-May, and incubation takes 43-45 days, with the nestling period usually 65-70 days. Golden eagles eat mostly lagomorphs and rodents, but will also take other mammals, birds, reptiles, and some carrion. The diet is most varied in the non-breeding season. The golden eagle is protected by the MBTA as well as the Bald and Gold Eagle Protection Act (BGEPA). It is also a California fully protected species.

d. Prairie falcon (*Falco mexicanus*)

The prairie falcon is an indigenous North American falcon that ranges from south-central British Columbia, south through the west and mid-western states to northern Mexico. It is found throughout the length of California, primarily in the arid lands of the interior (Small, 1994). The prairie falcon prefers open, dry countryside, including grasslands, canyonlands, coastal plains, agricultural lands, ranches, sagebrush flats, deserts, foothills, and open mountain valleys are all utilized for foraging (Small, 1994). Densely forested areas are typically avoided. Breeding habitat includes nest-sites on rocky cliffs or ledges or holes in eroded riverbanks. Clutch size varies geographically from two to six eggs with an average of four in most places. The incubation period is 31 days with the young typically fledging between 36 and 41 days. The primary prey of the prairie falcons is birds and mammals with the latter more available and making up a greater part of the diet during the summer months. The prairie falcon is protected by the MBTA and is considered a CSC species by CDFG.

e. Swainson's hawk (*Buteo swainsonii*)

The Swainson's hawk is a medium-sized hawk with long, pointed wings and a long, squared-off tail. Swainson's hawks typically breed in California and spend winters in Mexico and South America. Over 85 percent of Swainson's hawk territories in the Central Valley are in riparian systems adjacent to suitable foraging habitats (Zeiner et al., 1990). Swainson's hawks often nest near riparian systems as well as utilizing lone trees or groves of trees in agricultural fields. Valley oak, Fremont cottonwood, walnut, and large willow are most often used for nesting. Swainson's hawks require large, open grasslands with abundant prey in association with suitable nest trees. Suitable foraging areas include native grasslands or lightly grazed pastures, alfalfa and other hay crops, and certain grain and row croplands. Unsuitable foraging habitat includes crops such as vineyards, orchards, certain row crops, rice, corn and cotton crops. Suitable nest sites may be found in mature riparian forest, lone trees or groves of oaks, other trees in agricultural fields, and mature roadside trees.

Breeding occurs in late March to late August, with peak activity during late May through July. Clutch size includes usually two or three eggs. The diet of the Swainson's hawk is varied with the California vole being the main food item in the Central Valley, as well as a variety of bird and insect species. The Swainson's hawk is protected by the MBTA and is listed as a state threatened species.

f. Short-eared owl (*Asio flammeus*)

The short-eared owl is medium in size, but has proportionately large wings. As its name implies, this bird has essentially no ear tuffs. Dorsal coloration is a tawny brown; the breast is boldly streaked, the belly less so. Also diagnostic is the low, irregular flight, which resembles that of the Northern harrier.

This cosmopolitan owl is found on every continent except Australia, and ranges over all of North America (Bent, 1961). In California, short-eared owls are year-round residents in the northern half of the state, and winter visitors in the south. The short-eared owl is somewhat unusual in preferring open areas such as plains, marshes, tundra, and even deserts. Also unusual is that this owl is frequently abroad during the day and hunts chiefly at dawn and dusk. Such diurnal activity makes this species one of the most commonly observed owls Also the short-eared owl is a true small mammal specialist, preying primarily on rodents. Birds and insects are also taken, but only on a limited basis.

Somewhat uniquely, the short-eared owl nests on the open ground (usually in shallow depressions), and constructs crude nests of whatever vegetation may be available. Because these owls frequently roost on the ground, it is also one of the few owls likely to be encountered during walking (diurnal surveys). This species is considered a CSC by the CDFG.

g. Western burrowing owl (Athene cunicularia hypugea)

Burrowing owls are small, brown, long-legged owls of the open country. They are found in open, dry grasslands, agricultural and range lands, and desert habitats often associated with burrowing animals. They can also inhabit grass, forb, and shrub stages of pinyon and ponderosa pine habitats at elevations ranging from 200 feet below sea level to 9,000 feet. The owl commonly perches on fence posts or on top of mounds outside its burrow. These owls can be found at the margins of airports and golf courses and in vacant urban lots. They are active day and night, but are usually less active in the peak of the day. Burrowing owls tend to be opportunistic feeders. Large arthropods, mainly beetles and grasshoppers, comprise a large portion of their diet. Small mammals, especially mice, rat, gophers, and ground squirrels, are also important food items. Other prey animals include: reptiles and amphibians, scorpions, young cottontail rabbits, bats, and birds, such as sparrows and horned larks. Consumption of insects increases during the breeding season. The burrowing owl hovers while hunting, similar to an American kestrel (*Falco sparverius*) and after catching its prey it returns to a perch on a fence post or the ground. As their name suggests, burrowing owls nest in burrows in the ground, often in old ground squirrel burrows or badger dens. They can dig their own burrows, but prefer deserted excavations of other animals. They are also known to use artificial burrows. The burrowing owl is protected by the MBTA and is considered a CSC species by CDFG.

h. Le Conte's thrasher (*Toxostoma lecontei*)

The Le Conte's thrasher is an uncommon to rare resident in southern California from Inyo Co. south to Mexico, and in the western and southern San Joaquin Valley (Zeiner et al., 1990). It is a brown bird with the characteristic long, decurved thrasher beak. This species occurs primarily in open desert wash, desert scrub, alkali desert scrub, and desert succulent shrub habitats.

Le Conte's thrasher commonly nests in a dense, spiny shrub or densely branched cactus in desert wash habitat. The nest is usually placed 0.6 to 2.6 m above ground. Breeding season extends from late January into early June, with a peak from mid-March to mid-April. Clutch size ranges from two to four eggs, with two to three broods each year. Both sexes incubate and tend altricial young, which leave parents' territory at about four weeks. These birds feed on a variety of insects and other terrestrial arthropods; and occasionally on seeds, small lizards, and other small vertebrates. Le Conte's thrasher is protected by the MBTA and is considered a CSC species by CDFG.

i. Tricolored blackbird (*Agelaius tricolor*)

The tricolored blackbird is similar to the more common red-winged blackbird, except for a prominent white stripe under the red wing patch, and more pointed wings and bill. It is common locally throughout the Central Valley and along the coast south of Sonoma County. This species breeds near fresh water, preferably in emergent wetlands, and forages in grasslands and croplands. Tricolored blackbirds usually nest in dense cattails (*Typha* spp.) or tules (*Scirpus* spp.); also nests in thickets of willow (*Salix* spp.), blackberry (*Rubus ursinus*), wild rose (*Rosa californica*), and tall forbs. Mud or plant material nests are usually located a few feet over, or near, fresh water, or may be hidden on the ground among low vegetation.

The typical tricolored blackbird breeding season is mid-April into late July. Males are polygynous, and each male may have several mates nesting in his small territory. A colony varies in size from a minimum of about fifty nests to over 20,000 in an area of four ha (10 ac), or less. Clutch size ranges from two to six eggs, and mating pairs may raise two broods per year. Young birds fledge at about thirteen days. Typical food items are arthropods and seeds. Tricolored blackbird is protected by the MBTA and is considered a CSC species by CDFG.

j. Loggerhead shrike (*Lanius ludovicianus*)

The loggerhead shrike is a common resident and winter visitor in lowlands and foothills throughout California (Zeiner et al., 1990). It prefers open habitats with scattered shrubs, trees, posts, fences, utility lines, or other perches. It is most commonly found in open-canopied valley foothill hardwood, valley foothill hardwood-conifer, valley foothill riparian, pinyon-juniper, juniper, desert riparian, and Joshua tree habitats. The loggerhead shrike frequents open habitats with sparse shrubs and trees, other suitable perches, bare ground, and low or sparse herbaceous cover.

The loggerhead shrike builds its nest on a stable branch in a densely foliaged shrub or tree, usually concealing it. Most nests are found below fifteen feet above ground. In California, the loggerhead shrike lays eggs from March into May, and young become independent in July or August. Mated pairs are monogamous, clutch sizes range from four to eight eggs (Porter et al.,

1975). Incubation lasts fourteen to fifteen days. Altricial young are tended by both parents and leave the nest at eighteen to nineteen days.
Loggerhead shrikes are known for their behavior of impaling insects and other prey on barbed-wire fences or twigs. The loggerhead shrike eats mostly large insects, but will also take small birds, mammals, amphibians, reptiles, fish, carrion, and various other invertebrates. It searches for prey from a perch at least two feet above ground (Grinnell and Miller, 1944), often much higher. Loggerhead shrike is protected by the MBTA and is considered a CSC species by CDFG.

k. California horned lark (Eremophila alpestris actia)

The California horned lark is a ground-dwelling bird that is a widespread occupant of open habitats across North America. It inhabits areas with sparse vegetation and exposed soil. In western North America, this species is associated with desert scrub, grasslands, and similar open habitats, as well as alpine meadows (Andrews and Righter, 1992; Garrett and Dunn, 1981). The California subspecies is found along coastal grasslands.

When not flying, California horned larks walk across the ground, using grasses, shrubs, rocks, and other types of terrain as cover from predators when feeding. Insects, spiders, and snails are the main food sources during the breeding season; grass and seeds of forbs supplement their diet during other seasons (Zeiner et al., 1990). Breeding occurs between March and July, with peak activity in May (Zeiner et al., 1990). Two to five gray, spotted eggs are laid in a grass-lined nest in a cup-shaped depression on open ground. Incubation lasts ten days to two weeks. Young are tended by both parents and leave the nest in nine to eleven days. Young can fly three to five days after leaving the nest. California horned lark is protected by the MBTA and is considered a CSC species by CDFG.

l. Lark sparrow (Chondestes grammacus)

The lark sparrow is a light-colored sparrow, with a chestnut and white striped head, and a dark, thin eye stripe. It is buff-colored below with a dark chest spot and chestnut, black, and white mottled above. The lark sparrow is found in open situations with scattered bushes and trees such as prairies, forest edges, cultivated areas, orchards, fields with bushy borders, and savannas.

The lark sparrow builds a cup-shaped nest, usually in a depression on the ground, but may also nest in shrubs or crevices in rocks. Clutch initiation peaks in early May. The female incubates three to six eggs for about twelve days. Young leave the nest at nine to ten days. The lark sparrow feeds on seeds and insects (especially grasshoppers). Individuals forage on the ground, often in small flocks, and are seen in flocks, especially during winter. The lark sparrow is protected by the MBTA and is included on the CDFG Special Animals list (CDFG, 2006).

5. Mammals

a. Roosting bat species (Order Chiroptera)

Several bat species have the potential to roost and/or forage in the Coalinga area, including Townsend's big-eared bat (*Corynorhinus townsendii*), pallid bat (*Antrozous pallidus*), California

mastiff bat (*Eumops perotis californicus*), and Yuma myotis (*Myotis yumanensis*) (Department of Mental Health and Department of General Services, 2000; Tatarian, 2001).

Bats roost in caves, trees, and other natural settings, and man-made structures provide important roosting habitat for most of the bat species in North America (Tatarian, 2001), including most of the species in California. Most species are known to have adapted to using barns, schools, churches, residential and commercial buildings, bridges, and other transportation structures. Bats typically use the interior of structures as day roosts and the more exposed locations for shelter, feeding, and rest during the night (Kunz, 1982). Bats that use man-made structures for either day or night roosting are at risk of being killed as a result of illegal or incompetent pest control and building renovation or demolition, among other factors (Tatarian, 2001). Several bat species in California are considered CSC species by CDFG and/or are included on the CDFG Special Animals list.

b. San Joaquin antelope squirrel (*Ammospermophilus nelsoni*)

The San Joaquin antelope squirrel is a small squirrel with bright white on the underside of its tail that it frequently holds over its back while running. This species is a permanent resident of the western San Joaquin Valley from 60-360 m (200-1200 ft), on dry, sparsely vegetated, loam soils. It is found from southern Merced County and south to Kern County, also occurring in portions of eastern San Luis Obispo County.

Habitats of San Joaquin antelope squirrels consist of grasslands with moderate shrub cover, including species such as saltbush (*Atriplex* spp.), bladder pod (*Isomeris arborea*), goldenbush (*Isocoma* spp.), and others. Populations now exist primarily in marginal habitats of the low foothills and mountains of the western edge of the valley.

Antelope squirrels use burrows that they or other animals have dug. The general active period during spring and summer months coincides with air temperatures of 68º to 86º F. Breeding occurs from February into May, with a peak in April. Litters of up to ten young have been reported, and squirrels live in family groups. The San Joaquin antelope squirrel is omnivorous, eating mainly seeds and insects. Predators include badgers, kit foxes, red-tailed hawks, golden eagles, coyotes, and various snakes. San Joaquin antelope squirrel is listed as a state threatened species.

c. San Joaquin pocket mouse (Perognathus inornatus inornatus)

The San Joaquin pocket mouse is a small buff-colored mouse with dark guard hairs on its back. It has relatively short ears, occasionally with lighter hair at their base. The tail is long, hairy, uniform in color, and has a tuft of hair toward the tip. External, fur-lined cheek pouches are used to store seeds, which are carried back to burrows.

The San Joaquin pocket mouse is found in the Central Valley and Salinas Valley, in dry, open grassland or scrub areas with fine textured soils between 1,100 and 2,000 feet. These mice tend to forage above ground within the cover of a shrub, generally away from open areas. They may occur on shrubby ridge tops and hillsides (Hawbecker, 1951) but more characteristically inhabit sandy areas with grasses and forbs (Grinnell, 1933).

Breeding season is from March to July, and the females have at least two litters of four to six young per litter. Diet consists of mainly saltbush seeds, with grass and forb seeds and insects as supplemental food sources. Predators include badgers, owls, weasels, skunks, foxes, and feral cats. San Joaquin pocket mouse is included on the CDFG Special Animals list (CDFG, 2006) and is a former Federal Category 2 species, recognized as sensitive.

d. Giant kangaroo rat (*Dipodomys ingens*)

The giant kangaroo rat is the largest of the kangaroo rats, and can be differentiated from other kangaroo rats by size and their hind feet, which are longer than 47 mm and have five toes (Best, 1993). The species is currently fragmented in to six major geographic units, one of which includes the Panoche Region in western Fresno and Eastern San Benito Counties (USFWS, 1998). Populations of giant kangaroo rats expand and decline with changing weather patterns.

Giant kangaroo rats inhabit grassland and shrub communities on a variety of soil types and slopes (USFWS, 1998). Giant kangaroo rats are primarily seed-eaters, but also eat green plants and insects. They cut ripening heads of grasses and forbs and store them in small surface pits located on the area over their burrow system, covering them with a layer of soil. They will also make large stacks of seed heads on the surfaces of their burrows. They are chiefly nocturnal, foraging on the surface from sunset to sunrise.

Giant kangaroo rats can breed in their first year, with up to three litters each year. They breed from January to May, producing a litter of one to three young. Giant kangaroo rats are a significant prey item for several species, including San Joaquin kit fox, coyotes, owls, and snakes. The giant kangaroo rat is federally and state listed as endangered.

e. Short-nosed kangaroo rat (Dipodomys nitratoides brevinasus)

The short-nosed kangaroo rat is one of three subspecies of the San Joaquin kangaroo rat. The appearance of the short-nosed subspecies is similar to the Fresno (*D. n. exilis*) and Tipton (*D. n. nitratoides*) kangaroo rats, being light-brown to buff-colored on top and white underneath, with the typical long kangaroo rat tail. Typically, short-nosed kangaroo rats inhabit grasslands with scattered shrubs and desert-shrub associations on fine, powdery, alkaline soils on the western side of the San Joaquin Valley. Over most of their range, they are most common in the sandy bottoms and banks of arroyos and other sandy areas.

Short-nosed kangaroo rats are nocturnal and active year-round. They eat mostly seeds, but will supplement their diet with forbs and insects when available. The breeding season begins in late February or March and typically ends by May. In wet years, individuals may continue breeding through August. Average litter size is two to three young. Short-nosed kangaroo rats undergo dramatic population fluctuations, based on rainfall and food availability. Predators include carnivorous mammals, snakes, and owls. Short-nosed kangaroo rat is considered a CSC species by CDFG.

f. Tulare grasshopper mouse (Onychomys torridus tularensis)

The Tulare grasshopper mouse has a stout body with a short, club-like tail. The head and upperparts are pale brown to gray or pinkish- cinnamon, and it is white underneath. The tail is usually bicolored with a white tip. The young and subadults are gray in color.
Currently, the subspecies is found along the western margin of the Tulare Basin, including western Kern County; Carrizo Plain Natural Area; along the Cuyama Valley side of the Caliente Mountains, San Luis Obispo County; and the Ciervo-Panoche Region, in Fresno and San Benito counties. Tulare grasshopper mice inhabit arid shrublands in hot, arid grassland and shrubland associations. They typically inhabit grasslands associations on the sloping margins of the San Joaquin Valley and Carrizo Plain region.

Specific information on the reproduction and mating system of the Tulare grasshopper mouse is lacking. Grasshopper mice breed from May through July. In the wild, up to three litters per year may be produced. Tulare grasshopper mouse adult males are territorial and vocalize at night, emitting a high-pitched call, lasting several seconds, while standing on their hind legs with head raised and mouth open. The Tulare grasshopper mouse is primarily a carnivore, feeding mainly on small mammals and insects, as well as other invertebrates and seeds. Tulare grasshopper mouse is considered a CSC species by CDFG.

g. San Joaquin kit fox (*Vulpes macrotis mutica*)

The San Joaquin kit fox is the smallest canid species in North America. They have an average body length of twenty inches, an average tail length of twelve inches and stand approximately nine to twelve inches at the shoulder. Adult males weigh approximately five pounds, and adult females weigh approximately 4.6 pounds. Kit foxes are slender and characterized by relatively long legs and large ears. Their coat ranges from tan to buffy gray in the summer to silvery gray in the winter. Their undersides are whitish and their tail is black-tipped.

The historic range of the San Joaquin kit fox included most of the San Joaquin Valley from San Joaquin County southward to southern Kern County (USFWS, 1998). Currently, kit foxes occur in the remaining native valley and foothill grasslands and saltbush scrub communities of the valley floor and surrounding foothills from southern Kern County north to Merced County. Distribution is spotty within this range. A density of one kit fox per square mile in suitable habitat is a reasonable figure to use to estimate populations based on known acreage of habitat, although densities can range from less than one to over six foxes per square mile (USFWS, 2005).

Kit foxes use dens for protection, temperature regulation, and shelter from weather. Kit foxes may dig their own dens, use those constructed by other animals, or use artificial structures (e.g. culverts, abandoned pipelines, or banks in sumps). Kit foxes often change dens and many dens may be used throughout the year. Evidence that kit foxes are using a den may not always be visible.

Kit foxes can breed when one year old. Adult pairs are monogamous and stay together all year. Mating occurs between December and March. Litters of two to six pups are born in February or March. Pups emerge from the den after about a month.

Kit foxes are chiefly nocturnal. Diet for kit foxes varies geographically, seasonally and annually, based on abundance of prey. In the southern part of the range, one-third of the kit fox diet consists of kangaroo rats, pocket mice, white-footed mice, and other nocturnal rodents (USFWS, 2005). In the northern portion of the range, kit foxes most often prey on California ground squirrels. Kit foxes also prey on leporids (cottontails and jackrabbits), San Joaquin antelope squirrels, ground-nesting birds, and insects. Predators include coyotes, red foxes, and occasionally raptors. Kit fox mortality from vehicle collisions is also high. The San Joaquin kit fox is federally listed as endangered and state listed as threatened.

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APPENDIX C

- Transportation and Circulation Background Information

CITY OF COALINGA

GENERAL PLAN UPDATE EIR

TRAFFIC/TRANSPORTATION

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CITY OF COALINGA GENERAL PLAN UPDATE EIR
TRAFFIC / TRANSPORTATION

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August 28, 2008

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CITY OF COALINGA GENERAL PLAN UPDATE EIR
TRAFFIC / TRANSPORTATION

METHODOLGY / STANDARDS / MEASURES OF SIGNIFICANCE

Level of Service Thresholds

Levels of Service are used to describe the quality of traffic flow on city streets and state highways. "Level of Service (LOS)" is a qualitative measure of traffic operating conditions whereby a letter grade, "A" through "F", corresponding to progressively worsening traffic operating conditions, is assigned to an intersection or roadway segment. The City of Coalinga General Plan indicates that LOS "D" is the applicable minimum design standard.

Characteristics. Level of Service can be calculated for different types of facilities. Level of Service can be determined for segments of city streets and highways and for specific street intersections, and published methodologies for determining Level of Service are predicated on hourly traffic volumes on these facilities. For this study, information regarding intersection Levels of Service has been developed using the procedures contained in the 2000 Highway Capacity Manual (HCM). Table 1 presents the general characteristics of each Level of Service grade at intersections and on roadway segments.

Planning Levels of Service Based on Daily Traffic Volumes. While assessment of peak hour conditions is standard, for planning level traffic studies it is also beneficial to describe Levels of Service based on the average daily traffic volumes occurring on major city streets and state highways. Use of daily volumes is common for General Plan analysis as it permits relatively quick assessment of circulation system needs.

Level of Service thresholds for streets and highways in Coalinga were developed based on review of several sources. Because there is no uniform national standard to equate daily traffic volumes on urban streets to specific Levels of Service, the existing City of Coalinga General Plan EIR and its background references and Caltrans guidelines were considered. While Caltrans has no recommendations in this area, general thresholds originally developed by the Florida Department of Transportation (FDOT) are most applicable. The daily Level of Service thresholds developed by FDOT have been used by many California agencies.

Level of Service thresholds are based on daily volume where developed in a manner that accounted for the presence of features that affect urban traffic flow. Resulting LOS thresholds are presented in Table 2. These thresholds are employed to identify the number of through travel lanes that would typically be expected on each street.

TABLE 1
LEVEL OF SERVICE DEFINITIONS – INTERSECTIONS

Level of Service	Signalized Intersection	Unsignalized Intersection	Roadway (Daily)
"A"	*Uncongested operations, all queues clear in a single-signal cycle.* Delay ≤ 10.0 sec v/c < 0.60	Little or no delay. Delay ≤ 10 sec/veh	Completely free flow.
"B"	Uncongested operations, all queues clear in a single cycle. Delay > 10.0 sec and ≤ 20.0 sec 0.60 < v/c ≤ 0.70	Short traffic delays. Delay > 10 sec/veh and ≤ 15 sec/veh	Free flow, presence of other vehicles noticeable.
"C"	Light congestion, occasional backups on critical approaches. Delay > 20.0 sec and ≤ 35.0 sec 0.70 < v/c ≤ 0.80	Average traffic delays. Delay > 15 sec/veh and ≤ 25 sec/veh	Ability to maneuver and select operating speed affected.
"D"	Significant congestion of critical approaches but intersection functional. Cars required to wait through more than one cycle during short peaks. No long queues formed. Delay > 35.0 sec and ≤ 55.0 sec 0.80 < v/c ≤ 0.90	Long traffic delays. Delay > 25 sec/veh and ≤ 35 sec/veh	Unstable flow, speeds and ability to maneuver restricted.
"E"	*Severe congestion with some long standing queues on critical approaches. Blockage of intersection may occur if traffic signal does not provide for protected turning movements. Traffic queue may block nearby intersection(s) upstream of critical approach(es).* Delay > 55.0 sec and ≤ 80.0 sec 0.90 < v/c ≤ 1.00	Very long traffic delays, failure, extreme congestion. Delay > 35 sec/veh and ≤ 50 sec/veh	At or near capacity, flow quite unstable.
"F"	Total breakdown, stop-and-go operation. Delay > 80.0 sec v/c > 1.00	Intersection blocked by external causes. Delay > 50 sec/veh	Forced flow, breakdown.
Overall Level of Service for unsignalized intersections is "worst case" of delay experienced by all motorists			
Sources: 2000 Highway Capacity Manual, Transportation Research Board (TRB) Special Report 209			

TABLE 2
GENERAL LEVEL OF SERVICE THRESHOLDS BASED ON DAILY TRAFFIC VOLUMES

Street Classification	Lanes	Control	Daily Traffic Volume at LOS				
			A	B	C	D	E
Collector	2	Undivided	4,000	5,800	7,700	11,600	12,900
	2+	Undivided	4,600	7,000	9,200	13,700	15,450
Arterial	2+	Divided	6,500	9,000	11,200	15,400	16,300
	4+	Divided	13,800	19,000	26,000	32,700	34,200
	6+	Divided	20,700	28,500	40,300	49,200	51,800
+ includes center turn lane							

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EXISTING SETTING

Current Levels of Service – Roadway Segments

Traffic Volumes. Table 3 presents current daily traffic volumes and resulting Levels of Service on the streets and highways that serve Coalinga. The classification of each street under the proposed Circulation Element is also noted. The daily volume counts presented for City streets were assembled in 2005 as the City's General Plan Update began. Traffic volumes reported for State Highways are taken from year 2007 data reported by Caltrans.

TABLE 3
EXISTING AVERAGE DAILY TRAFFIC VOLUMES AND RESULTING LEVEL OF SERVICE

Street	Location	Roadway Classification	Existing		
			Daily Traffic Volume	Lanes	Level of Service
State Highways (2007)					
SR 33	Interstate 5 to SR 198 (north)	Arterial	2,700	2	A
	SR 198 (north) to Gale Ave	Arterial	4,600	2	A
	Gale Ave to Phelps Ave	Arterial	5,900	2	A
	Phelps Ave to Cambridge Ave	Arterial	8,400	2	B
	Cambridge Ave to Cherry Ave	Arterial	8,400 (10,440)	4	A
	Cherry Ave to Van Ness Ave	Arterial	9,800	4	A
	Van Ness Ave to 5th Ave	Arterial	9,600	4	A
(5th Avenue) (Pock Street)	Elm Avenue to Polk Street	Arterial	6,400 (5,300)	2	B
	5th Avenue to Hayes Street	Arterial	10,700	2	C
	Hayes Street to Garfield Street	Arterial	10,700	2	C
	Garfield Street to Merced Ave	Arterial	7,800 (7,850)	2	B (B)
	Merced Ave to Juniper Ridge	Arterial	7,200	2	B
	Juniper Ridge to San Joaquin Ave	Arterial	7,200	2	B
	San Joaquin Ave to Calaveras Ave	Arterial	7,200	2	B
	Calaveras Ave to Jayne Ave	Arterial	7,200	2	B
SR 198	Firestone Ave to Lucile Ave	Arterial	1,500	2	A
	Lucile Ave to Pacific Street	Arterial	1,500	2	A
	Pacific Street to Pleasant Street	Arterial	5,300	2	A
	Pleasant Street to Polk Street	Arterial	5,300 (3,450)	2	A (A)
	Polk Street to 5th Street	Arterial	8,000	2	B
	SR 33 (North) to Interstate 5	Arterial	2,700	2	A
	Interstate 5 to Lassen Ave	Arterial	6,400	2	A
SR 145	Interstate 5 to Excelsior Ave	Arterial	4,400	2	A

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TABLE 3
EXISTING AVERAGE DAILY TRAFFIC VOLUMES AND RESULTING LEVEL OF SERVICE

Street	Location	Roadway Classification	Existing		
			Daily Traffic Volume	Lanes	Level of Service
Interstate 5 Ramps (2007)					
SR 145 / SR 33	NB I-5 off ramp	Ramp	700	1	n.a.
	NB I-5 on ramp	Ramp	1,100	1	n.a.
	SB I-5 off ramp	Ramp	1,050	1	n.a.
	SB I-5 on ramp	Ramp	760	1	n.a.
SR 198	NB I-5 off ramp	Ramp	2,800	1	n.a.
	NB I-5 on ramp	Ramp	4,500	1	n.a.
	SB I-5 off ramp	Ramp	6,000	1	n.a.
	SB I-5 on-ramp	Ramp	2,400	1	n.a.
Jayne Avenue	NB I-5 off ramp	Ramp	1,200	1	n.a.
	NB I-5 on ramp	Ramp	1,150	1	n.a.
	SB I-5 off ramp	Ramp	1,200	1	n.a.
	SB I-5 on ramp	Ramp	1,250	1	n.a.
East – West Streets					
Phelps Avenue	SR 33 to Posa Chanet Blvd	Arterial	4,100	2	A
	Posa Chanet Blvd to Calaveras Ave	Arterial	810	2	A
Cambridge Ave	California Ave to SR 33	Arterial	2,835	2	A
Van Ness Ave	California Ave to SR 33	Collector	2,040	2	A
5th Street	SR 33 to Sunset	Collector	2,170	2	A
Pacific Street	SR 198 to West Forest Ave	Collector	1,220	2	A
North – South Streets					
Monterey Ave	Gale Ave to Cambridge Ave	Collector			
California Street	Washington Ave to Polk Street	Collector	260	2	A
Hayes Avenue	Glenn Ave to SR 33	Collector	1,100	2	A
Garfield Avenue	Roosevelt St to SR 33	Collector	1,840	2	A
Juniper Ridge	SR 33 to Pacific Ave	Collector	900	2	A
Calaveras Ave	Phelps Ave to SR 33	Collector	800	2	A
(volumes in brackets are spot counts on State highways)					

Current Levels of Service – Intersections

Current a.m. and p.m. peak hour Levels of Service at key intersections in Coalinga are presented in Table 4. These values are based on recent intersection traffic counts made between 4:00 p.m. and 6:00 p.m. (March 2005). At signalized intersections and at locations controlled by all-way stops, these values represent the average condition for all motorists passing through the intersection. At intersections controlled by side street stop signs, the values presented are representative of the "worst case" delays occurred by motorists waiting to turn onto the main street.

As shown, the Levels of Service occurring today at key intersections in Coalinga are very good. The two signalized study intersections operate at LOS B. Longest delays for side street traffic occur today at the Elm Street / Cambridge Avenue intersection during the a.m. peak hour. Delays at this location are characteristics of LOS D conditions. The Level of Service at all other intersection is LOS C or better.

The extent to which any location is already a candidate for a traffic signal was also evaluated using the peak hour volume warrants established by Caltrans. These warrants consider both *urban* and *rural (high speed)* conditions. Assuming that the higher volume urban warrants are applicable, none of the unsignalized intersections satisfies warrants during both the a.m. and p.m. peak hour. Volumes at the Elm Street / Cambridge Avenue intersection meet volume warrants during the a.m. peak hour only.

TABLE 4
EXISTING LEVELS OF SERVICE

Intersection	Control	A.M. Peak Hour		P.M. Peak Hour		Traffic Signal Warranted?
		LOS	Average Delay (secs)	LOS	Average Delay (secs)	
SR 33 (Elm Street) / Phelps Ave	Signal	B	13.6 sec	B	14.6 sec	n.a.
SR 33 (Elm Street) / Cambridge Ave	EB Stop	D	25.3 sec	B	13.2 sec	No
SR 33 (Elm Street) / Van Ness Ave / 1st St	EB /WB Stop	B	13.5 sec	B	14.7 sec	No
SR 33 (Elm Street) / 3rd Street	All-Way Stop	A	9.8 sec	B	10.1 sec	No
SR 33 (Elm Street) / 5th Street	All-Way stop	B	10.8 sec	B	11.2 sec	No
Elm Street / Polk Street	Signal	B	16.0 sec	B	16.1 sec	n.a.
SR 198 / Pacific Street	EB/WB Stop	B	10.4 sec	B	10.7 sec	No
Polk Street / Forest Ave	NB/SB Stop	B	12.3 sec	B	15.0 sec	No
SR 33 (Polk Street) / 5th Street	NB/SB Stop	B	13.5 sec	C	16.9 sec	No
SR 33 (Polk Street) / Garfield Street	NB/SB Stop	B	14.5 sec	C	17.1 sec	No
SR 33 (Polk Street) / Merced Ave	NB/SB Stop	B	12.6 sec	B	14.1 sec	No
Warrant review based n *Urban* volume requirements						

TRAFFIC OPERATIONS ANALYSIS

Methodology

To evaluate the impacts of implementing the General Plan it was necessary to identify and quantify the land use expected to develop over the life of the General Plan, identify the amount of vehicular traffic accompanying that development, assign traffic to the planned circulation system and determine resulting Levels of Service.

Land Use. The amount of residential and non-residential land use that could be developed under the new General Plan has been identified.

This land use data has been used to make estimates of daily vehicular trip generation resulting from development under the plan. As shown, using employment density factors and trip generation rates provided by the Fresno Council of Governments build out of the plan could generate 389,854 daily automobile trips. Because the number of non-residential trips exceeds the residential total, much of this traffic (i.e., the balance) will be external to Coalinga.

TABLE 5
PROJECTED TRIP GENERATION

Land Use	Proposed General Plan Buildout		
	Total Units	Trips per unit	Total Trips
Residential – Dwellings			
Single Family	21,490	8.79	188,897
Multiple Family	5,590	6.94	38,795
Total Residential	27,080	-	227,692
Non-Residential – Acres			
General Commercial	166 acres	605	100,430
Commercial Service	188 acres	285	53,580
Manufacturing/Business	1,674 acres	56	93,744
Total Non-Residential			247,754
Total			475,446

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Travel Demand Forecasting Model

The City of Coalinga lies within the area included in the Fresno Council of Governments (FCOG) Regional Travel Demand Forecasting Model. This tool is regularly maintained by FCOG staff and is the primary source of future traffic volume projections for state highways, county roads and major city streets in Fresno County. Land uses envisioned under the current Coalinga General Plan are included in FCOG's baseline Year 2030 traffic model.

Regional models, however, are intended to provide information for major facilities and typically lack the detail to provide accurate forecasts at the collector street level. Thus, to provide forecasts for the Coalinga GPU it was necessary to first modify the structure of the model's roadway *link network* and *traffic analysis zones (taz's)*. Those streets anticipated under the new Circulation Diagram were added to the model as new links, and the available system of taz's was disaggregated to provide greater detail and to load the new street system in a more accurate manner. Recommendations for model changes were provided to FCOG staff, these changes and future land use quantities were added to year 2030 traffic model, and daily traffic volume projections were made for the proposed General Plan.

Daily Traffic Volume Forecasts / Levels of Service

Table 6 lists the projected daily traffic volumes on major streets in Coalinga under the proposed GPU. The results have been separated into projections for State Highways, for east-west streets and for north-south streets. The number of lanes anticipated under the General Plan Circulation Diagram have also been noted and employed to identify the resulting Level of Service.

Table 6 also presents current daily traffic volumes where available for comparison, as well as available data from the FCOG baseline year 2030 forecast. However, because of the limitations of the baseline model noted previously, baseline forecasts are only representative for state highways.

TABLE 6
GENERAL PLAN BUILDOUT (4/08)
AVERAGE DAILY VOLUMES AND RESULTING LEVEL OF SERVICE

Street	Location	Classification	Existing Daily Traffic Volume	2030 Current General Plan (FCOG)			2030 General Plan Build Out		
				Daily Traffic Volume	Lanes	Level of Service	Daily Traffic Volume	Lanes	Level of Service
State Highways									
SR 33 (Elm Street)	Interstate 5 to SR 198 (north)	Arterial	2,800	5,375	2	C	26,450	4	C-D
	SR 198 (north) to Gale Ave	Arterial	4,500	5,775	2	D	29,600	4	D
	Gale Ave to North Wellington	Arterial	4,650	6,050	2	D	29,125	4	D
	North Wellington to Central Wellington	Arterial	4,650	6,050	2	C	23,125	4	C
	Central Wellington to South Wellington	Arterial	4,650	6,050	2	D	32,150	4	D
	South Wellington to Phelps Ave	Arterial	5,800	6,050	2	D	31,100	4	D
	Phelps Ave to Cambridge Ave	Arterial	8,300	7,340	2	C	31,150	4	D
	Cambridge Ave to Cherry Ave	Arterial	8,300 (10,440)	-	-	-	21,050	4	C
	Cherry Ave to Van Ness Ave	Arterial	9,700	-	-	-	21,100	4	C
	Van Ness Ave to 5th Ave	Arterial	9,700	-	-	-	**16,200**	**2**	E
(5th Avenue)	Elm Avenue to Polk Street	Arterial	6,300 (5,300)	-	-	-	8,675	2	B
SR 33 (Polk Street)	5th Avenue to Hayes Street	Arterial	10,600	5,610	2	A	19,375	4	C
	Hayes Street to Garfield Street	Arterial	10,600	5,610	2	A	23,550	4	C
	Garfield Street to Merced Ave	Arterial	7,600 (7,850)	5,610	2	A	**38,575**	**4**	F
	Merced Ave to Juniper Ridge	Arterial	7,100	5,200	2	A	**40,150**	**4**	F
	Juniper Ridge to San Joaquin Ave	Arterial	7,100	5,200	2	A	**35,675**	**4**	F
	San Joaquin Ave to Calaveras Ave	Arterial	7,100	5,200	2	A	32,250	4	D
	Calaveras Ave to Jayne Ave	Arterial	7,100	5,900	2	A	27,600	4	D

TABLE 6
GENERAL PLAN BUILDOUT (4/08)
AVERAGE DAILY VOLUMES AND RESULTING LEVEL OF SERVICE

Street	Location	Classification	Existing Daily Traffic Volume	2030 Current General Plan (FCOG)			2030 General Plan Build Out		
				Daily Traffic Volume	Lanes	Level of Service	Daily Traffic Volume	Lanes	Level of Service
Jayne Ave (County Road)	SR 33 to El Dorado Ave	Arterial	-	6,040	2	A	25,150	4	C
	El Dorado Ave to I-5	Arterial	-	5,560	2	A	**18,900**	**2**	**F**
	East of Interstate 5	Arterial	-	3,330	2	A	10,975	2	C
SR 198	Firestone Ave to Lucile Ave	Arterial	1,500	2,800	2	A	2,850	2	A
	Lucile Ave to Pacific Street	Arterial	1,500	2,800	2	A	6,875	2	A
	Pacific Street to Pleasant Street	Arterial	5,100	5,700	2	A	10,875	2	C
	Pleasant Street to Polk Street	Arterial	5,100 (3,450)	5,700	4	A	21,475	4	C
	Polk Street to 5th Street	Arterial	7,800	4,200	4	A	16,625	4	B
	SR 33 (North) to Interstate 5	Arterial	2,650	2,250	2	A	3,925	2	A
	East of Interstate 5 to Lassen	Arterial	6,200	9,200	2	A	9,775	2	C
SR 145	Interstate 5 to Excelsior Ave	Arterial	4,200	5,600	2	A	**21,150**	**2**	**F**
Interstate 5 Ramps									
SR 145 / SR 33	NB I-5 off ramp	Ramp	640	550	1	n.a.	725	1	n.a.
	NB I-5 on ramp	Ramp	1,000	640	1	n.a.	3,725	1	n.a.
	SB I-5 off ramp	Ramp	990	615	1	n.a.	3,225	1	n.a.
	SB I-5 on ramp	Ramp	750	510	1	n.a.	650	1	n.a.
SR 198	NB I-5 off ramp	Ramp	3,200	25	1	n.a.	100	1	n.a.
	NB I-5 on ramp	Ramp	5,300	4,450	1	n.a.	4,950	1	n.a.
	SB I-5 off ramp	Ramp	5,600	4,430	1	n.a.	4,650	1	n.a.
	SB I-5 on ramp	Ramp	3,800	25	1	n.a.	100	1	n.a.
Jayne Avenue	NB I-5 off ramp	Ramp	1,250	1,225	1	n.a.	2,600	1	n.a.
	NB I-5 on ramp	Ramp	1,350	590	1	n.a.	1,600	1	n.a.
	SB I-5 off ramp	Ramp	1,300	580	1	n.a.	1,350	1	n.a.
	SB I-5 on ramp	ramp	1,150	1,450	1	n.a.	3,000	1	n.a.

TABLE 6
GENERAL PLAN BUILDOUT (4/08)
AVERAGE DAILY VOLUMES AND RESULTING LEVEL OF SERVICE

Street	Location	Classification	Existing Daily Traffic Volume	2030 Current General Plan (FCOG)			2030 General Plan Build Out		
				Daily Traffic Volume	Lanes	Level of Service	Daily Traffic Volume	Lanes	Level of Service
East – West Streets									
Gale Ave	Monterey Ave to SR 33	Collector	-	230	2	A	1,425	2	A
Welling North Access	SR 33 to Loop	Arterial	-	-	-	-	7,000	2	B
Wellington Central Access	SR 33 to Loop	Arterial	-	-	-	-	8,425	2	B
Wellington So Access	SR 33 to Loop	Arterial	-	-	-	-	11,650	4	A
	Loop to Collector	Arterial	-	-	-	-	11,950	4	A
	Collector to Juniper Ridge	Arterial	-	-	-	-	14,920	4	B
Phelps Avenue	SR 33 to Posa Chanet Blvd	Arterial	4,100	1,700	2	1	16,575	4	B
	Posa Chanet Blvd to School Farm Connection	Arterial	-	130	2	A	18,450	4	B
	School Farm Connection to Wellington Connection	Arterial	-	130	2	A	12,450	4	A
	Wellington Connection to Juniper Ridge	Arterial	-	130	2	A	8,950	4	A
	Extension to New Street	Arterial	-	130	2	A	11,450	4	A
	New Street to East Loop	Arterial	-	130	2	A	8,850	4	A
	East loop to Calaveras Ave	Arterial	810	130	2	A	13,125	4	A
	Calaveras Ave to El Dorado Ave	Arterial	-	5	2	A	6,375	4	A
Cambridge Ave	Monterey Ave to California Ave	Collector	-	-	-	-	1,000	2	A
	California Ave to SR 33	Collector	2,835	-	-	-	10,425	2	D
Washington St	Monterey Ave to California Ave	Collector	-	-	-	-	1,250	2	A
Van Ness Ave	California Ave to SR 33	Collector	2,040	-	-	-	15,100	2	E
1st Street – Van Ness	SR 33 to East Glenn Ave	Collector	-	-	-	-	13,725	2	D-E

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TABLE 6
GENERAL PLAN BUILDOUT (4/08)
AVERAGE DAILY VOLUMES AND RESULTING LEVEL OF SERVICE

Street	Location	Classification	Existing Daily Traffic Volume	2030 Current General Plan (FCOG)			2030 General Plan Build Out		
				Daily Traffic Volume	Lanes	Level of Service	Daily Traffic Volume	Lanes	Level of Service
5th Street	SR 33 to SR 33	Arterial	-	-	-	-	8,650	2	A
	SR 33 to Sunset	Collector	2,170	-	-	-	9,300	2	C
West Polk St	Monterey Ave to California St	Collector	-	-	-	-	5,125	2	A
	California to SR 33	Collector	-	-	-	-	6,275	2	A
Polk Street	SR 198 to 5th Street	Collector	-	-	-	-	14,750	2	E
Pacific Street	Monterey Ave to SR 198	Collector	-	-	-	-	1,700	2	A
	SR 198 to West Forest Ave	Collector	1,220	-	-	-	5,650	2	A
	West Forest Ave to Merced Ave	Collector	-	1,250	2	A	10,400	2	D
	Merced Ave to Juniper Ridge	Collector	-	-	-	-	6,575	2	A
	Juniper Ridge to San Joaquin Ave	Collector	-	-	-	-	3,375	2	A
North – South Street									
Monterey Ave	Gale Ave to Cambridge Ave	Collector	-	-	-	-	1,750	2	A
	Cambridge Ave to Polk Street	Collector	-	-	-	-	1,600	2	A
	Polk Street to Pacific Ave	Collector	-	-	-	-	2,050	2	A
California Street	Cambridge Ave to Washington Ave	Collector	-	-	-	-	3,075	2	A
	Washington Ave to Polk Street	Collector	260	-	-	-	4,450	2	A
Hayes Avenue	Glenn Ave to SR 33	Collector	1,100	-	-	-	8,050	2	C
School Road	North of Roosevelt St	Arterial	-	-	-	-	15,250	2	D
	South of Phelps Avenue	Arterial	-	-	-	-	20,025	4	C
Garfield Avenue	Roosevelt St to SR 33	Collector	1,840	2,550	2	A	12,700	2	D
Merced Avenue	SR 33 to Pacific Ave	Collector	-	1,360	2	A	11,125	2	D

TABLE 6
GENERAL PLAN BUILDOUT (4/08)
AVERAGE DAILY VOLUMES AND RESULTING LEVEL OF SERVICE

Street	Location	Classification	Existing Daily Traffic Volume	2030 Current General Plan (FCOG)			2030 General Plan Build Out		
				Daily Traffic Volume	Lanes	Level of Service	Daily Traffic Volume	Lanes	Level of Service
Juniper Ridge	Wellington South to Phelps Ave	Arterial	-	-	-	-	12,700	2	D
	Phelps Ave to bridge	Arterial	-	-	-	-	19,425	4	C
	Bridge to SR 33	Arterial	-	-	-	-	21,000	4	C
	SR 33 to Pacific Ave	Collector	900	-	-	-	5,850	2	A
San Joaquin Ave	SR 33 to Pacific Ave	Collector	-	-	-	-	10,625	2	D
Calaveras Ave	Phelps Ave to SR 33	Collector	800	1,655	2	A	8,000	2	A

Peak Hour Traffic Volumes and Intersection Levels of Service

The impacts of implementing the proposed GPU have also been assessed based on a.m. and p.m. peak hour conditions at key intersections.

Methodology. A two step process was employed to create future intersection turning movements. First, localized growth rates were identified for the approaches to each intersection based on comparison of modeled year 2006 and modeled year 2030 volumes. The incremental increase in modeled a.m. and p.m. peak hour intersection approach and departure volumes were then added to observed traffic counts to produce adjusted year 2030 volumes. Adjusted year 2030 forecasts were compared to observed counts and the resulting growth rate was determined for each approach / departure. These growth rates were then used to interpolate future intersection peak hour volumes using methods described in the Transportation Research Board's (TRB's) NCHRP Report 255, *Highway Traffic Data for Urbanized Area Project Planning and Design* (refer to Appendix).

Levels of Service. Peak Hour Levels of Service were calculated for study intersections under two scenarios. The first scenario assumes no improvements have been made to these intersections. The second scenario assumes that the study area intersections are improved in a manner that is consistent with the number of lanes designated in the Circulation Diagram. Where applicable, auxiliary turn lanes have also been added. While modifications to these assumptions will likely occur in the future as more detail regarding long term traffic conditions becomes available, Table 7 notes General Plan build out geometry assumed for this analysis. Table 8 presents resulting Levels of Service during the a.m. and p.m. peak hours.

As indicated, it should be possible to improve study area intersections to deliver LOS D or better conditions at all locations.

TABLE 7
GPU BUILD OUT INTERSECTION GEOMETRY

#	Street	Lanes	Auxiliary Lane	Street	Lane	Auxiliary Lane	Control
1	SR 33	4	NB left and right turn lanes SB left and right turn lanes	Phelps Road	2	EB left and right turn lanes WB Dual left turn lanes and a right turn lane	Signal
2	SR 33 (Elm Street	4	NB left turn lane SB fight turn lane	Cambridge Ave	2	EB left turn lane and combined left+right turn lane	Signal
3	SR 33 (Elm Street)	4	NB left turn lane SB left turn lane	Van Ness Ave – 1st Street	2	EB left turn lane WB left turn lane an right turn lane	Signal
4	SR 33 (Elm Street)	4	None	3rd Street	2	None	Signal
6	SR 33 (Elm Street)	4	None	5th Street	2	None	Signal
7	Elm Street	4	NB left turn lane SB left turn lane	Polk Street	4	NB left turn lane SB left turn lane	Signal
8	Polk Street	4	EB left turn lane WB left turn lane	Forest Street	2	NB left turn lane SB left turn lane and right turn lane	Signal
9	SR 33 (5th Street)	2	None	Polk Street	2	EB left turn lane WB right turn lane	Signal
10	SR 33 (Polk Street)	4	EB left turn lane WB left turn lane	Garfield Street	2	NB left turn lane SB left turn lane and combined left+thru+right turn lane	Signal
11	SR 33 (Polk Street)	4	WB left turn lane	Merced Street	2	Northbound left turn lane	Signal
11	SR 198	2	NB left turn lane SB left turn lane	Pacific Street	2	WB left turn lane	Signal

TABLE 8
YEAR 2030 INTERSECTION LEVELS OF SERVICE

Intersection	Control		A.M. Peak Hour				P.M. Peak Hour			
			Existing Geometry		Proposed Geometry		Existing Geometry		Proposed Geometry	
	Existing	Proposed	LOS	Ave Delay (sec's)	LOS	Ave Delay (sec's)	LOS	Ave Delay (sec's)	LOS	Ave Delay (sec')
1. SR 33 (Elm Street) / Phelps Ave	Signal	Signal	F	**128.2 sec**	C	19.7 sec	F	**184.5 sec**	C	32.1 sec
2. SR 33 (Elm Street) / Cambridge Ave	EB Stop	Signal	F	**>999 sec**	C	25.0 sec	F	**>999 sec**	C	21.3 sec
3. SR 33 (Elm Street) / Van Ness Ave / 1st St	EB /WB Stop	Signal	F	**>999 sec**	C	28.9 sec	F	**>999 sec**	D	41.3 sec
4. SR 33 (Elm Street) / 3rd Street	All-Way Stop	Signal	D	26.4 sec	B	16.5 sec	F	**70.4 sec**	C	34.2 sec
5. SR 33 (Elm Street) / 5th Street	All-Way Stop	Signal	E	**39.6 sec**	C	21.9 sec	F	**98.2 sec**	D	47.4 sec
6. Elm Street / Polk Street	Signal	Signal	C	18.6 sec	C	18.6 sec	C	26.8 sec	C	26.8 sec
7. SR 198 / Pacific Street	EB/WB Stop	Signal	D	34.0 sec	B	20.7 sec	F	**>999 sec**	C	26.8 sec
8. Polk Street / Forest Ave	NB/SB Stop	Signal	C	19.9 sec	B	15.9 sec	F	**>999 sec**	C	22.6 sec
9. SR 33 (Polk Street) / 5th Street	NB/SB Stop	Signal	F	**306.8 sec**	B	17.3 sec	F	**>999 sec**	B	23.7 sec
10. SR 33 (Polk Street) / Garfield Street	NB/SB Stop	Signal	F	**>999 sec**	C	21.9 sec	F	**>999 sec**	C	30.9 sec
11. SR 33 (Polk Street) / Merced Avenue	NB/SB Stop	Signal	F	**>999 sec**	C	28.4 sec	F	**>999 sec**	D	52.9 sec
Warrant review based n *Urban* volume requirements										

Traffic Signals

The evaluation of key intersections has noted several locations where traffic signals will be needed to deliver LOS D or better conditions. It is also possible to identify future signalized intersections based on the daily traffic volume warrant thresholds contained in the Manual of Uniform Traffic Control Devices (MUTCD). At a planning level, intersections with daily volumes on all legs totaling more than 24,000 ADT with at least 3,000 ADT on each leg can be assumed to eventually warrant signalization.

Table 9 lists the locations of traffic signals that are projected to be needed at General Plan Build Out. This list excludes two roundabout intersections incorporated into the configuration of the Coalinga School Farm project that would otherwise warrant signalization

TABLE 9
SIGNALIZED INTERSECTIONS AT GENERAL PLAN BUILDOUT

1	SR 33 / Wellington North Access
2	SR 33 / Wellington Central Access
3	SR 33 / Wellington South Access
4	SR 33 / Phelps Avenue (modify
5	SR 33 / Cambridge Avenue
6	SR 33 / Van Ness Avenue / First Street
7	SR 33 / Third Street
8	SR 33 / Fifth Street
9	SR 198 (Elm Avenue) / Polk Ave (exist)
10	SR 198 / Pacific Avenue
11	Polk Avenue / Forest Avenue
12	Polk Avenue / SR 33 (5^{th} Street)
13	SR 33 (Polk Avenue) / Garfield Street
14	SR 33 (Polk Avenue) / Merced Street
15	SR 33 (Polk Avenue) / Commercial Access
16	SR 33 (Polk Avenue) / Juniper Ridge Blvd
17	SR 33 (Polk Avenue) / Commercial Access
18	SR 33 (Polk Avenue)/ San Joaquin Ave
19	SR 33 (Polk Avenue) / Calaveras Avenue
20	SR 33 (Polk Avenue) / Jayne Avenue
21	Phelps Avenue / School Farm Road
22	Phelps Avenue / New Collector
23	Phelps Avenue / New Collector
24	Phelps Avenue / Juniper Ridge Blvd
25	Phelps Avenue / New Collector
26	Phelps Avenue / South Wellington
27	South Wellington / New Collector
28	SR 33 / Yolo Street
29	Kern Street / Q Street
30	South Wellington / New Collector
31	South Wellington / New Collector
32	South Wellington / Juniper Ridge Blvd

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IMPACTS OF IMPLEMENTING THE COALINGA GENERAL PLAN AND MITIGATION MEASURES

The text which follows summaries the traffic impacts associated with future traffic conditions accompanying implementation of the Coalinga General Plan.

State Highway 33, State Highway 198 and Jayne Avenue

Impact 1: Development Under the Coalinga General Plan will impact SR 33, SR 198 and Jayne Avenue in the Area Beyond the Coalinga Sphere of Influence.

Discussion. Full buildout of a community the size of Coalinga under the draft General Plan will result in an appreciable increase in the volume of traffic on regional roadways, especially when the number of non-residential trips exceeds the residential trip generation. The volume of traffic on SR 33 and Jayne Avenue beyond Coalinga Sphere of Influence is indicative of LOS F conditions under the proposed General Plan. This is significant regional impact that is not expected under the current General Plan.

Measures to incrementally increase the capacity of the regional roadway system will be needed. Initially, the developing of passing lanes at key locations will be needed to improve the overall flow of traffic on regional routes. Ultimately, four lane roadways will be needed to link Coalinga with the balance of Fresno County.

Mitigation: New development in Coalinga will need to contribute it fair share to the cost of improvements to the regional highway system, and the City of Coalinga will need to work with FCOG and Caltrans to include these improvements in the Regional Transportation Plan and in applicable regional funding programs. Applicable implementation studies will need to be conducted in order to confirm the feasibility and cost of improvements and to make them eligible for funding. The City of Coalinga should modify its traffic impact fee program to:

1. Include the cost of "interim improvements" (i.e., passing lanes);
2. Include the cost of implementation studies for ultimate improvements (i.e., Project Study Reports), and
3. Include fair share contribution to the cost of these regional improvements.

Significance After Mitigation. This impact is mitigatable if a mechanism is develop to fully fund the cost of regional improvements and development in Coalinga contributes its fair share to the cost of these improvements. However, because improvements to SR 33, SR 198 and Jayne Avenue are not yet included in regional funding program, because these improvements must compete for funding with other projects and because development in Coalinga is unlikely to be able to fund these improvements alone, mitigation is not assured. Thus, impacts to the regional roadway system are a significant and unavoidable impact.

Impact 2: Development in Coalinga will Impact Interchanges on Interstate 5.

Discussion: Comparison of baseline and "with project" traffic volumes reveals that implementation of the Coalinga General Plan will result in increased traffic on Interstate 5 ramps and on structures over the Interstate. Projected traffic volumes near the SR 33 / SR 145 interchange and on the Jayne Avenue interchange will exceed the capacity of the existing two lane crossings. As other local development is likely, a regional approach to funding long term improvements is needed.

Mitigation: The City of Coalinga should implement the following mitigation measures:

1. The city should contribute to the cost of Project Study Reports for the Interstate 5 interchanges with SR 33 / SR 145, SR 198, and Jayne Avenue which would confirm ultimate improvement needs and fair share responsibilities.
2. The City should modify its traffic impact mitigation fee program to include "fair share" of the cost of improvements that should be borne by new development in Coalinga.

Significant after Mitigation: Less than significant

Impact 3: Development in Coalinga will add traffic to SR 33 (Elm Avenue) through Downtown.

Discussion. The portion of SR 33 south of Cambridge Avenue through the downtown will carry volumes that are indicative of the need for a 4 lane road under the General Plan and for signalization of major intersections. As noted in the traffic operations analysis, there will be a need to make improvements to key intersections to provide auxiliary lanes.

Mitigation Measures. The following mitigation measures should be implemented:

1. The City of Coalinga and Caltrans should complete a plan line study for SR 33 from Cambridge Avenue to Fifth Street to identify the configuration and limits of ultimate improvements to SR 33 through the developed area of Coalinga;
2. The City's traffic mitigation fee program should be updated to include the cost of constructing SR 33 improvements in those locations where fronting development is unlikely and roadway widening will likely be necessary as the General Plan is built out.

Significance after Mitigation: Less than significant.

Impact 4: Development in Coalinga will increase the volume of traffic on SR 33 (Polk Street – Jayne Avenue) east of the Fifth Street intersection.

Discussion. The volume of traffic on SR 33 (Polk Street – Jayne Avenue) will greatly exceed the capacity of a two lane highway and will result in the need for a four lane arterial, but based on daily traffic volume the Level of Service from the Garfield Avenue intersection to the San Joaquin Avenue intersection may exceed LOS D. This result exceeds the General Plan's minimum LOS D goal, and is a potentially significant impact. Exceeding LOS D could be interpreted as justifying a six lane roadway at build out of the community, however, this level of improvement in not planned by either Caltrans or the City. Alternative mitigation strategies to reduce the volume of traffic on SR 33 will involve developing an additional east-west collector road parallel to SR 33 between down Coalinga and new growth areas, or restrict the intensity of commercial and industrial uses planned on the SR 33 corridor to ensure that cumulative development along Jayne Avenue from South Merced Avenue to Calaveras Avenue, including the Enterprise Parkway Commercial Area. Development of auxiliary lanes at major intersections and a high level of access controls will also be pursued. To provide a guideline for local improvements, the City and Caltrans should develop and implement an *SR 33 Access Management Plan* which would identify the location and nature future access and the location of auxiliary turn lanes.

Mitigation. The following mitigations measures should be implemented:

1. The City of Coalinga and Caltrans should develop and implement an SR 33 Access Management Plan;
2. The City should continue to require that fronting development construct ultimate frontage improvements as development proceeds, and those improvements should be consistent with the SR 33 Access Management Plan;
3. The City's traffic mitigation fee program should be updated to include the cost of constructing SR 33 improvements in those locations where fronting development is unlikely and roadway widening will likely be necessary as the General Plan is built out.
4. The City shall pursue development of an additional east-west collector road parallel to SR 33 that would link the downtown area with new growth areas
5. The City shall create a mechanism for monitoring development along the SR 33 corridor and for limiting the intensity of commercial and industrial to ensure that cumulative development along Jayne Avenue from South Merced Avenue to Juniper Ridge Avenue, does not result in the need to widen SR 33 (Jayne Avenue) to six lanes

Significance after Mitigation. Less than significant

Impact 5: Development in Coalinga will result in increased traffic on Van Ness Avenue and First Street near SR 33, and Level of Service in excess of City standards is projected.

Discussion. Development in the area east of the downtown area will result in increased traffic on the local streets that new development with the Downtown area. Due to the limited number of connections that area available, traffic is concentrated into the Van Ness Street – First Street Route. The intersection will need to be signalized and the westbound First Street – Van Ness approaches will need to be consolidated. A direct route from SR 33 to the Coalinga School Farm project will be needed.

Mitigation: The City of Coalinga should implement the following improvements.

1. Conduct a plan line study for the area to define the limits of future construction. The study should confirm a strategy that would close off the westbound Van Ness Street approach and reconstruct First Street to extend easterly from SR 33 to the Coalinga School farms project area.
2. Signalize the SR 33 / Van Ness Street / First Street intersection
3. Modify the City's Traffic impact mitigation fee program to include these improvements.

Significance after Mitigation: Less than significant.

City Streets

Impact 6: Development in Coalinga will result in the need for new roads to provide access and circulation within the community.

Discussion: The draft General Plan envisions the development of a comprehensive circulation system serving new growth areas. While new roads will provide access to new development, many of these roads will need to be planned as four lane facilities to accommodate city-wide circulation. To ensure that these roads are available when needed a combine strategy of fronting developer responsibility and city-wide fees is needed. Such a fee program may recognize that fronting development is responsible curb, gutter, sidewalk, drainage, street lights, etc, as well as one travel lane. Citywide benefit may be derived from a second through lane and median areas.

Mitigation: The City of Coalinga should update its traffic impact fee program to include the cost of regionally beneficial street improvements that are installed as development proceeds.

Significance after Mitigation: Less than significant.

Impact 7: Development in Coalinga will result in intersections carrying traffic volumes that will satisfy traffic signal warrants.

Discussion: the traffic operations analysis has identified 29 intersections which are likely to warrant traffic signals over the life of the General Plan., although the exact locations of future signals will need to be determined in response to actual traffic conditions occurring in Coalinga. Traffic signals on public roads are typically considered to be of city-wide or regional benefit, and as such should be funded by all new development. The cost of traffic signals on state highways may also have Caltrans participation.

Mitigation: the City of Coalinga should update its traffic impact fee program to include the cost of future traffic signals.

Significance after Mitigation: Less than significant.

APPENDIX D

- Air Quality Background Information

GENERAL COMMERCIAL

URBEMIS 2002 For Windows 8.7.0

File Name: G:\1 Projects Directory\2005\05-414 Coalinga Master Plan EIR\A Working MEIR\Appendices\Appendix
Project Name: Coalinga GP Typical Developments
Project Location: San Joaquin Valley
On-Road Motor Vehicle Emissions Based on EMFAC2002 version 2.2

SUMMARY REPORT
(Tons/Year)

AREA SOURCE EMISSION ESTIMATES

	ROG	NOx	CO	SO2	PM10
TOTALS (tpy, unmitigated)	0.02	0.01	0.08	0.00	0.00

OPERATIONAL (VEHICLE) EMISSION ESTIMATES

	ROG	NOx	CO	SO2	PM10
TOTALS (tpy, unmitigated)	6.22	9.55	81.96	0.07	7.43

SUM OF AREA AND OPERATIONAL EMISSION ESTIMATES

	ROG	NOx	CO	SO2	PM10
TOTALS (tpy, unmitigated)	6.24	9.56	82.04	0.07	7.44

MULTI-FAMILY RESIDENTIAL

URBEMIS 2002 For Windows 8.7.0

File Name: G:\1 Projects Directory\2005\05-414 Coalinga Master Plan EIR\A Working MEIR\Appendices\Appendix
Project Name: Coalinga GP Typical Developments
Project Location: San Joaquin Valley
On-Road Motor Vehicle Emissions Based on EMFAC2002 version 2.2

SUMMARY REPORT
(Tons/Year)

AREA SOURCE EMISSION ESTIMATES

	ROG	NOx	CO	SO2	PM10
TOTALS (tpy, unmitigated)	4.76	0.63	11.45	0.04	1.83

OPERATIONAL (VEHICLE) EMISSION ESTIMATES

	ROG	NOx	CO	SO2	PM10
TOTALS (tpy, unmitigated)	4.97	6.79	60.51	0.05	4.94

SUM OF AREA AND OPERATIONAL EMISSION ESTIMATES

	ROG	NOx	CO	SO2	PM10
TOTALS (tpy, unmitigated)	9.73	7.42	71.96	0.09	6.77

SINGLE-FAMILY RESIDENTIAL

URBEMIS 2002 For Windows 8.7.0

File Name: G:\1 Projects Directory\2005\05-414 Coalinga Master Plan EIR\A Working MEIR\Appendices\Appendix
Project Name: Coalinga GP Typical Developments
Project Location: San Joaquin Valley
On-Road Motor Vehicle Emissions Based on EMFAC2002 version 2.2

SUMMARY REPORT
(Tons/Year)

AREA SOURCE EMISSION ESTIMATES

	ROG	NOx	CO	SO2	PM10
TOTALS (tpy, unmitigated)	4.69	0.76	10.43	0.04	1.53

OPERATIONAL (VEHICLE) EMISSION ESTIMATES

	ROG	NOx	CO	SO2	PM10
TOTALS (tpy, unmitigated)	5.14	7.17	63.87	0.05	5.21

SUM OF AREA AND OPERATIONAL EMISSION ESTIMATES

	ROG	NOx	CO	SO2	PM10
TOTALS (tpy, unmitigated)	9.83	7.93	74.30	0.09	6.74

APPENDIX E

- Climate Change Background Information

6/26/2008 10:03:30 AM

Urbemis 2007 Version 9.2.4

Combined Annual Emissions Reports (Tons/Year)

File Name: C:\Documents and Settings\dmorrow\Application Data\Urbemis\Version9a\Projects\Coalinga_Screening_GP.urb924

Project Name: Coalinga GP EIR - Screening Level

Project Location: Fresno County

On-Road Vehicle Emissions Based on: Version : Emfac2007 V2.3 Nov 1 2006

Off-Road Vehicle Emissions Based on: OFFROAD2007

Summary Report:

CONSTRUCTION EMISSION ESTIMATES

	ROG	NOx	CO	SO2	PM10 Dust	PM10 Exhaust	PM10	PM2.5 Dust	PM2.5 Exhaust	PM2.5	CO2
2010 TOTALS (tons/year unmitigated)	20.91	85.08	240.41	0.24	7,180.72	3.70	7,184.42	1,499.79	3.34	1,503.13	29,034.47
2010 TOTALS (tons/year mitigated)	14.12	81.19	240.41	0.24	894.32	2.54	896.86	186.94	2.28	189.22	29,034.47
Percent Reduction	32.47	4.58	0.00	0.00	87.55	31.20	87.52	87.54	31.79	87.41	0.00
2011 TOTALS (tons/year unmitigated)	37.55	118.29	381.41	0.43	7,944.76	5.14	7,949.90	1,659.49	4.62	1,664.10	49,696.30
2011 TOTALS (tons/year mitigated)	21.37	114.32	381.41	0.43	1,053.85	3.95	1,057.80	220.39	3.52	223.91	49,696.30
Percent Reduction	43.07	3.36	0.00	0.00	86.74	23.19	86.69	86.72	23.76	86.54	0.00
2012 TOTALS (tons/year unmitigated)	35.97	107.86	350.40	0.43	7,975.31	4.77	7,980.09	1,665.87	4.28	1,670.14	49,898.46
2012 TOTALS (tons/year mitigated)	19.74	104.11	350.40	0.43	1,057.90	3.66	1,061.56	221.24	3.25	224.49	49,898.46
Percent Reduction	45.12	3.47	0.00	0.00	86.74	23.30	86.70	86.72	23.94	86.56	0.00
2013 TOTALS (tons/year unmitigated)	34.52	98.11	321.11	0.43	7,975.31	4.42	7,979.74	1,665.87	3.95	1,669.82	49,907.52

2013 TOTALS (tons/year mitigated)	18.29	94.59	321.11	0.43	1,057.90	3.39	1,061.29	221.24	3.01	224.24	49,907.52
Percent Reduction	47.02	3.58	0.00	0.00	86.74	23.30	86.70	86.72	23.98	86.57	0.00
2014 TOTALS (tons/year unmitigated)	33.13	88.87	294.79	0.43	7,975.31	4.08	7,979.40	1,665.87	3.64	1,669.51	49,914.91
2014 TOTALS (tons/year mitigated)	16.89	85.60	294.79	0.43	1,057.90	3.14	1,061.04	221.24	2.77	224.00	49,914.91
Percent Reduction	49.01	3.68	0.00	0.00	86.74	23.16	86.70	86.72	23.90	86.58	0.00
2015 TOTALS (tons/year unmitigated)	31.78	80.44	271.19	0.43	7,975.31	3.76	7,979.08	1,665.87	3.35	1,669.21	49,918.97
2015 TOTALS (tons/year mitigated)	15.55	77.42	271.19	0.43	1,057.90	2.89	1,060.79	221.24	2.54	223.78	49,918.97
Percent Reduction	51.08	3.75	0.00	0.00	86.74	23.19	86.71	86.72	24.00	86.59	0.00
2016 TOTALS (tons/year unmitigated)	30.63	72.93	249.99	0.43	7,975.31	3.51	7,978.82	1,665.87	3.12	1,668.98	49,921.17
2016 TOTALS (tons/year mitigated)	14.40	70.14	249.99	0.43	1,057.90	2.70	1,060.61	221.24	2.38	223.61	49,921.17
Percent Reduction	53.00	3.82	0.00	0.00	86.74	22.94	86.71	86.72	23.76	86.60	0.00
2017 TOTALS (tons/year unmitigated)	29.49	65.96	229.93	0.43	7,944.76	3.24	7,948.00	1,659.49	2.87	1,662.36	49,731.30
2017 TOTALS (tons/year mitigated)	13.32	63.40	229.93	0.43	1,053.85	2.52	1,056.36	220.39	2.20	222.59	49,731.30
Percent Reduction	54.84	3.88	0.00	0.00	86.74	22.44	86.71	86.72	23.31	86.61	0.00
2018 TOTALS (tons/year unmitigated)	28.66	60.10	213.73	0.43	7,975.31	3.03	7,978.34	1,665.87	2.68	1,668.55	49,923.06
2018 TOTALS (tons/year mitigated)	12.42	57.74	213.73	0.43	1,057.90	2.37	1,060.27	221.24	2.07	223.31	49,923.06
Percent Reduction	56.65	3.92	0.00	0.00	86.74	21.69	86.71	86.72	22.58	86.62	0.00
2019 TOTALS (tons/year unmitigated)	27.82	54.73	198.47	0.43	7,975.31	2.81	7,978.13	1,665.87	2.48	1,668.35	49,923.16

2019 TOTALS (tons/year mitigated)	11.59	52.56	198.47	0.43	1,057.90	2.23	1,060.13	221.24	1.94	223.18	49,923.16
Percent Reduction	58.35	3.96	0.00	0.00	86.74	20.85	86.71	86.72	21.76	86.62	0.00
2020 TOTALS (tons/year unmitigated)	27.10	50.08	185.07	0.43	8,005.87	2.65	8,008.52	1,672.25	2.33	1,674.58	50,114.48
2020 TOTALS (tons/year mitigated)	10.81	48.08	185.07	0.43	1,061.95	2.12	1,064.07	222.08	1.84	223.92	50,114.48
Percent Reduction	60.12	3.98	0.00	0.00	86.74	20.08	86.71	86.72	21.02	86.63	0.00
2021 TOTALS (tons/year unmitigated)	25.11	42.23	136.42	0.43	7,975.31	2.54	7,977.86	1,665.87	2.23	1,668.10	49,923.73
2021 TOTALS (tons/year mitigated)	8.88	40.24	136.42	0.43	1,057.90	2.01	1,059.91	221.24	1.74	222.98	49,923.73
Percent Reduction	64.65	4.71	0.00	0.00	86.74	20.85	86.71	86.72	21.89	86.63	0.00
2022 TOTALS (tons/year unmitigated)	25.02	42.07	135.90	0.43	7,944.76	2.53	7,947.29	1,659.49	2.22	1,661.70	49,732.45
2022 TOTALS (tons/year mitigated)	8.84	40.09	135.90	0.43	1,053.85	2.00	1,055.85	220.39	1.73	222.12	49,732.45
Percent Reduction	64.65	4.71	0.00	0.00	86.74	20.85	86.71	86.72	21.89	86.63	0.00
2023 TOTALS (tons/year unmitigated)	25.02	42.07	135.90	0.43	7,944.76	2.53	7,947.29	1,659.49	2.22	1,661.70	49,732.45
2023 TOTALS (tons/year mitigated)	8.84	40.09	135.90	0.43	1,053.85	2.00	1,055.85	220.39	1.73	222.12	49,732.45
Percent Reduction	64.65	4.71	0.00	0.00	86.74	20.85	86.71	86.72	21.89	86.63	0.00
2024 TOTALS (tons/year unmitigated)	25.21	42.39	136.94	0.43	8,005.87	2.55	8,008.42	1,672.25	2.24	1,674.49	50,115.01
2024 TOTALS (tons/year mitigated)	8.92	40.40	136.94	0.43	1,061.95	2.02	1,063.97	222.08	1.75	223.83	50,115.01
Percent Reduction	64.63	4.71	0.00	0.00	86.74	20.85	86.71	86.72	21.89	86.63	0.00
2025 TOTALS (tons/year unmitigated)	2.48	13.00	12.51	0.01	6,531.58	0.54	6,532.12	1,364.07	0.49	1,364.56	4,035.16

2025 TOTALS (tons/year mitigated)	1.95	11.42	12.51	0.01	731.88	0.17	732.04	152.86	0.15	153.00	4,035.16
Percent Reduction	21.32	12.17	0.00	0.00	88.79	69.38	88.79	88.79	69.89	88.79	0.00

AREA SOURCE EMISSION ESTIMATES

	ROG	NOx	CO	SO2	PM10	PM2.5	CO2
TOTALS (tons/year, unmitigated)	175.05	72.05	91.63	0.12	1.57	1.51	86,419.98
TOTALS (tons/year, mitigated)	174.01	58.62	85.37	0.12	1.54	1.48	69,375.77
Percent Reduction	0.59	18.64	6.83	0.00	1.91	1.99	19.72

OPERATIONAL (VEHICLE) EMISSION ESTIMATES

	ROG	NOx	CO	SO2	PM10	PM2.5	CO2
TOTALS (tons/year, unmitigated)	548.32	797.50	5,484.21	3.37	289.96	70.04	339,926.64
TOTALS (tons/year, mitigated)	498.38	715.28	4,918.46	2.98	260.22	62.88	305,033.12
Percent Reduction	9.11	10.31	10.32	11.57	10.26	10.22	10.27

SUM OF AREA SOURCE AND OPERATIONAL EMISSION ESTIMATES

	ROG	NOx	CO	SO2	PM10	PM2.5	CO2
TOTALS (tons/year, unmitigated)	723.37	869.55	5,575.84	3.49	291.53	71.55	426,346.62
TOTALS (tons/year, mitigated)	672.39	773.90	5,003.83	3.10	261.76	64.36	374,408.89
Percent Reduction	7.05	11.00	10.26	11.17	10.21	10.05	12.18

Construction Unmitigated Detail Report:

CONSTRUCTION EMISSION ESTIMATES Annual Tons Per Year, Unmitigated

	ROG	NOx	CO	SO2	PM10 Dust	PM10 Exhaust	PM10	PM2.5 Dust	PM2.5 Exhaust	PM2.5	CO2
2010	20.91	85.08	240.41	0.24	7,180.72	3.70	7,184.42	1,499.79	3.34	1,503.13	29,034.47