

**THE VILLAGES AT ALMOND GROVE  
SPECIFIC PLAN  
FINAL ENVIRONMENTAL IMPACT REPORT**

**MADERA, CALIFORNIA  
STATE CLEARINGHOUSE NO. 2018081051**



March 2022

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**MADERA, CALIFORNIA  
STATE CLEARINGHOUSE NO. 2018081051**

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Project No. CMD1801

March 2022

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## 1.0 INTRODUCTION

### 1.1 PURPOSE OF THE FINAL ENVIRONMENTAL IMPACT REPORT

This document has been prepared to respond to comments received on the Draft Environmental Impact Report (Draft EIR) prepared for The Villages at Almond Grove Specific Plan (proposed project) for the City of Madera (City). The Draft EIR identifies the likely environmental consequences associated with implementation of the proposed project and recommends mitigation measures to reduce potentially significant impacts. This Final Environmental Impact Report (Final EIR) provides responses to comments received on the Draft EIR and makes revisions to the DEIR, as necessary, in response to those comments or to make clarifications in the Draft EIR. Consistent with Section 15132 of California Environmental Quality Act (CEQA) Guidelines, this document incorporates by reference the following:

- The Draft EIR and all its appendices;
- The Notice of Preparation (NOP) and Comments on the NOP (included as Appendix A of the Draft EIR);
- The Notice of Completion and Availability of the Draft EIR for public review; and
- Any other information added by the lead agency.

### 1.2 ENVIRONMENTAL REVIEW PROCESS

According to the California Environmental Quality Act (CEQA), lead agencies are required to consult with public agencies having jurisdiction over a proposed project and to provide the general public with an opportunity to comment on the Draft EIR.

The City circulated a Notice of Preparation (NOP) to solicit input from responsible and trustee agencies regarding the scope and content of the DEIR, as well as identify potential areas of controversy. The NOP was initially published on August 17, 2018, and was distributed to local, regional, and State agencies. A public scoping meeting for the preparation of the EIR was held at 6:00 p.m. on September 12, 2018. Following the comment review period, the Project Applicant provided refinements to the project that resulted in changes to the overall buildout numbers of the Specific Plan. A re-issued NOP was published on December 3, 2018. A new public scoping meeting was held at 2:00 p.m. on December 18, 2018. Comments received by the City on the NOP were taken into account during the preparation of the Draft EIR.

The Draft EIR was made available for public review on December 23, 2021, and was distributed to local and State responsible and trustee agencies. The 45-day public comment period ended on February 7, 2022. During the 45-day public review period for the DEIR, the City received seven comment letters. Copies of all written comments received during the comment period are included in Appendix L, Public Comment Letters on the Draft EIR, of this document.

### 1.3 DOCUMENT ORGANIZATION

This Final EIR consists of the following chapters:

- **Chapter 1.0: Introduction.** This chapter discusses the purpose and organization of this Final EIR, and summarizes the environmental review process for the project.
- **Chapter 2.0: Draft Environmental Impact Report Commenters.** This chapter contains a list of agencies, individuals and organizations who submitted written comments on the Draft EIR during the public review period.
- **Chapter 3.0: Comments and Responses.** This chapter contains a matrix that includes text of each CEQA-related comment received on the Draft EIR during the public review period, and a written response to each comment. Reproductions of all comment letters are included in Appendix L, Public Comment Letters on the Draft EIR.
- **Chapter 4.0: Draft Environmental Impact Report Text Revisions.** Corrections to the Draft EIR that are necessary in light of the comments received and responses provided, or necessary to amplify or clarify material in the Draft EIR, are contained in this chapter. No significant changes have been made to the information contained in the Draft EIR as a result of the responses to comments, and no significant new information has been added that would require recirculation of the document. Double-underlined text represents language that has been added to the Draft EIR; text with ~~strikeout~~ has been deleted from the Draft EIR.



## 2.0 DRAFT ENVIRONMENTAL IMPACT REPORT COMMENTERS

This chapter presents a list of comment letters received during the public review period and describes the organization of the letters and comments that are provided in Chapter 3.0, Comments and Responses, of this document.

### 2.1 ORGANIZATION OF COMMENT LETTERS AND RESPONSES

Chapter 3.0 includes a matrix of each comment received on the Draft Environmental Impact Report (Draft EIR) during the public review period, and a written response to each comment. Reproductions of all comment letters are included in Appendix L, Public Comment Letters on the Draft EIR. The written comments are grouped by the affiliation of the commenter, as follows: State agencies (A), Local Agencies (B), and Organizations and Interested Parties (C). The comment letters are numbered consecutively following the designations defined below:

State Agencies	A
Local Agencies	B
Organizations and Interested Parties	C

Comment letters are numbered and comments within each letter are numbered consecutively after the hyphen.

### 2.2 LIST OF COMMENTERS ON THE DEIR

Table 2.A provides a list of the State agencies, local agencies, and organizations and interested parties that commented on the Draft EIR prior to the close of the public comment period. The comments received have been organized by date received and in a manner that facilitates finding a particular comment or set of comments. Each comment letter received is indexed with a number below.

**Table 2.A: List of Comments Received**

<b>State Agencies</b>		
A1	California Department of Toxic Substances Control	January 4, 2022
A2	California Highway Patrol	February 4, 2022
A3	California Department of Conservation	February 7, 2022
<b>Local Agencies</b>		
B1	San Joaquin Valley Air Pollution Control District	January 12, 2022
B2	San Joaquin Valley Air Pollution Control District	February 7, 2022
<b>Organizations and Interested Parties</b>		
C1	Pacific Gas and Electric Company	December 27, 2021
C2	Pacific Coast Producers	January 10, 2022

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## 3.0 COMMENTS AND RESPONSES

Written responses to the comment letters received on the Draft Environmental Impact Report (Draft EIR) for The Villages at Almond Grove Specific Plan are provided in this chapter. The text of the letters received during the public review period on the Draft EIR are provided in their entirety.

Where comments on the Draft EIR concern issues requiring technical expertise, the response to comments relies on the knowledge and professional analysis of qualified experts. Where revisions to the Draft EIR text are called for, the page is set forth, followed by the appropriate revision. Added text is indicated with double-underlined text, and deleted text is shown in ~~strikeout~~ text. Text revisions to the Draft EIR are summarized in Chapter 4.0 of this Final Environmental Impact Report (Final EIR). Information provided in this Final EIR clarifies, amplifies, or makes minor modifications to the Draft EIR. No significant changes have been made to the information contained in the Draft EIR as a result of the comments received, and no significant new information has been added that would require recirculation of the Draft EIR pursuant to State CEQA Guidelines, section 15088.5.

### 3.1 COMMENTS AND RESPONSES MATRIX

Table 3.A includes all CEQA-related comments received on the Draft EIR and a response to each comment. The text of each comment has been included in the matrix and includes any grammatical errors included in the original comment letter. Each comment letter is included in its entirety in Appendix L, Public Comment Letters on the Draft EIR.

**Table 3.A: Comments and Responses Matrix**

Letter/ Comment Number	Comment	Response
<b>State Agencies</b>		
<b>A1 California Department of Toxic Substances Control (January 4, 2022)</b>		
A1-1	<p>The Department of Toxic Substances Control (DTSC) received a Draft Environmental Impact Report (EIR) for the Villages at Almond Grove Specific Plan (Project). The Lead Agency is receiving this notice from DTSC because the Project includes one or more of the following: groundbreaking activities, work in close proximity to a roadway, work in close proximity to mining or suspected mining or former mining activities, presence of site buildings that may require demolition or modifications, importation of backfill soil, and/or work on or in close proximity to an agricultural or former agricultural site.</p> <p>DTSC recommends that the following issues be evaluated in the EIR Hazards and Hazardous Materials section:</p>	<p>This comment provides an introduction to the comment letter and does not address the adequacy or completeness of the Draft EIR; does not raise environmental issues; and does not request the incorporation of additional information relevant to environmental issues. No further response is necessary.</p>
A1-2	<p>1. The EIR should acknowledge the potential for historic or future activities on or near the project site to result in the release of hazardous wastes/substances on the project site. In instances in which releases have occurred or may occur, further studies should be carried out to delineate the nature and extent of the contamination, and the potential threat to public health and/or the environment should be evaluated. The EIR should also identify the mechanism(s) to initiate any required investigation and/or remediation and the government agency who will be responsible for providing appropriate regulatory oversight.</p>	<p>This comment provides recommendations to address the release of hazardous substances resulting from historic or future activities on the Specific Plan Area. Threshold 4.9.2 under Section 4.9, Hazards and Hazardous Materials, of the EIR states that compliance with existing federal, State and local regulations, like General Plan Policies HS-10, HS-11, HS-14, HS-16 and HS-18, would reduce impacts related to the release of hazardous substances to less than significant. As such, this comment does not raise environmental issues or require incorporation of additional information related to environmental issues. No further response is necessary.</p>
A1-3	<p>2. Refiners in the United States started adding lead compounds to gasoline in the 1920s in order to boost octane levels and improve engine performance. This practice did not officially end until 1992 when lead was banned as a fuel additive in California. Tailpipe emissions from automobiles using leaded gasoline contained lead and resulted in aerially deposited lead (ADL) being deposited in and along roadways throughout the state. ADL-contaminated soils still exist along roadsides and medians and can also be found underneath some existing road surfaces due to past construction activities. Due to the potential for ADL-contaminated soil DTSC, recommends collecting soil samples for lead analysis prior to performing any intrusive activities for the project described in the EIR.</p>	<p>This comment provides recommendations to address potential presence of ADL-contaminated soils in the Specific Plan Area. Threshold 4.9.2 under Section 4.9, Hazards and Hazardous Materials, of the EIR states that no reported cases of residual soil contamination have been found within the Specific Plan Area. However, in case accidental release of hazardous substances, the implementation of federal, State and local regulations, like General Plan Policies HS-10, HS-11, HS-14, HS-16 and HS-18, would reduce impacts related to the release of hazardous substances to less than significant. As such, this comment does not raise environmental issues or require incorporation of additional information related to environmental issues. No further response is necessary.</p>

**Table 3.A: Comments and Responses Matrix**

Letter/ Comment Number	Comment	Response
A1-4	3. If any sites within the project area or sites located within the vicinity of the project have been used or are suspected of having been used for mining activities, proper investigation for mine waste should be discussed in the EIR. DTSC recommends that any project sites with current and/or former mining operations onsite or in the project site area should be evaluated for mine waste according to DTSC's 1998 Abandoned Mine Land Mines Preliminary Assessment Handbook	The Specific Plan Area has not been used for mining activities. In addition, under Government Code Section 65962.6, the DTSC is required to compile and update the Cortese List, which provides information about the location of hazardous materials release sites. There are no open cases for hazardous materials listed in the Cortese List within the Specific Plan Area or within a two-mile radius of the Specific Plan Area. Therefore, the recommendations of this comment are not applicable to the Specific Plan. No further response is necessary.
A1-5	4. If buildings or other structures are to be demolished on any project sites included in the proposed project, surveys should be conducted for the presence of lead-based paints or products, mercury, asbestos containing materials, and polychlorinated biphenyl caulk. Removal, demolition and disposal of any of the above-mentioned chemicals should be conducted in compliance with California environmental regulations and policies. In addition, sampling near current and/or former buildings should be conducted in accordance with DTSC's 2006 Interim Guidance Evaluation of School Sites with Potential Contamination from Lead Based Paint, Termiticides, and Electrical Transformers.	This comment provides recommendations to address potential impacts related to the release of hazardous substances through the demolition of existing buildings and structures in the Specific Plan Area. Mitigation Measure HAZ-1 includes specifications for the implementation of lead-based paint (LBP) and asbestos surveys prior to the issuance of demolition permits related to new development under the Specific Plan. Furthermore, removal of buildings with potential to become friable during demolition would require an inspection report to be submitted to and approved by the City in compliance with the San Joaquin Valley Air Pollution Control District (SJVAPCD). Mitigation Measure HAZ-1 addresses the concerns related to the release of LBP and asbestos upon the demolition of existing structures in the Specific Plan Area.
A1-6	5. If any projects initiated as part of the proposed project require the importation of soil to backfill any excavated areas, proper sampling should be conducted to ensure that the imported soil is free of contamination. DTSC recommends the imported materials be characterized according to DTSC's 2001 Information Advisory Clean Imported Fill Material.	Although there are no cases of reported cases of contamination in residual soil within the Specific Plan Area, an accidental release of hazardous materials can occur even when the highest level of precaution is practiced. The release of hazardous materials would be subject to existing federal, State, and local regulations. General Plan Policy HS-16 states that the City would work with other responsible agencies on efforts to clean up or contain identified soil or water contamination in the city limits. Compliance with applicable regulatory requirements for importing soils would reduce potential impact of transporting contaminated soil into the Specific Plan Area.
A1-7	6. If any sites included as part of the proposed project have been used for agricultural, weed abatement or related activities, proper investigation for organochlorinated	Development of the Specific Plan Area may include release of residual agricultural-associated chemicals including pesticides, herbicides and

**Table 3.A: Comments and Responses Matrix**

Letter/ Comment Number	Comment	Response
	pesticides should be discussed in the EIR. DTSC recommends the current and former agricultural lands be evaluated in accordance with DTSC’s 2008 Interim Guidance for Sampling Agricultural Properties (Third Revision).	fertilizers. Threshold 4.9.2 under Section 4.9, Hazards and Hazardous Materials, of the EIR identifies General Plan policies that address contaminated sites within the City. Policy HS-16 states that the City would work together with responsible agencies to clean up or contain soil and water contamination within the City limits. Policy HS-18 states that the City would require confirmation from applicable local, regional, state, and federal agencies that known contaminated sites have been deemed remediated to a level appropriate for land uses proposed prior to the City approving site development or provide an approved remediation plan that demonstrates how contamination will be remediated prior to site occupancy. Compliance with applicable General Plan policies would address potential for organochlorinated pesticides in the Specific Plan Area.
A1-8	DTSC appreciates the opportunity to comment on the EIR. Should you need any assistance with an environmental investigation, please visit DTSC’s Site Mitigation and Restoration Program page to apply for lead agency oversight. Additional information regarding voluntary agreements with DTSC can be found at DTSC’s Brownfield website. If you have any questions, please contact me at (916) 255-3710 or via email at <a href="mailto:Gavin.McCreary@dtsc.ca.gov">Gavin.McCreary@dtsc.ca.gov</a> .	This comment provides a closing to the comment letter and does not address the adequacy or completeness of the Draft EIR. No further response is necessary.
<b>A2 California Highway Patrol (February 4, 2022)</b>		
A2-1	Good morning/afternoon. No impact to the Madera Area’s local operations and/or public safety by SCH# 2018081015 was identified.	This comment states that the proposed project would have no impact to the CHP’s local operations or public safety and does not comment on the adequacy or completeness of the Draft EIR; does not raise environmental issues; and does not request the incorporation of additional information relevant to environmental issues. No further response is necessary.
<b>A3 California Department of Conservation (February 7, 2022)</b>		
A3-1	The Department of Conservation’s (Department) Division of Land Resource Protection (Division) has reviewed the Draft Environmental Impact Report (EIR) for the Villages at Almond Grove Specific Plan Project (Project). The Division monitors farmland conversion on a statewide basis, provides technical assistance regarding the Williamson Act, and administers various agricultural land conservation programs. We offer the following comments and recommendations with respect to the project’s potential impacts on	This comment provides an introduction to the comment letter and does not address the adequacy or completeness of the Draft EIR; does not raise environmental issues; and does not request the incorporation of additional information relevant to environmental issues. No further response is necessary.

**Table 3.A: Comments and Responses Matrix**

Letter/ Comment Number	Comment	Response
	agricultural land and resources.	
A3-2	<p><b>Project Description</b></p> <p>The Specific Plan envisions the development of a new compact mixed-use community that creates walkable and bikeable streets, and integrates open space throughout the area west of the City limits. The Specific Plan proposes to implement a village concept that would create opportunities for commercial development to be integrated with park and open space amenities.</p> <p>Development considered in the EIR consists of 10,783 residential units, approximately 2.1 million square feet of commercial and office space, approximately 164 acres of parks and recreational area, and approximately 54 acres of public facilities, including schools. In addition, the proposed Specific Plan would include infrastructure improvements including roadways and utilities. The proposed project would require a General Plan Amendment, pre-zoning, and annexation of the Specific Plan Area into the City. Additionally, future development proposals within the Specific Plan Area would be required to be consistent with the Airport Land Use Compatibility Plan for Madera Municipal Airport, and some parcels would require removal of active Williamson Act contracts prior to development.</p>	<p>This comment provides a summary of the commenter’s understanding of the Specific Plan and does not address the adequacy or completeness of the Draft EIR; does not raise environmental issues; and does not request the incorporation of additional information relevant to environmental issues. No further response is necessary.</p>
A3-3	<p><b>Department Comments</b></p> <p>The conversion of agricultural land represents a permanent reduction and significant impact to California’s agricultural land resources. CEQA requires that all feasible and reasonable mitigation be reviewed and applied to projects. Under CEQA, a lead agency should not approve a project if there are feasible alternatives or feasible mitigation measures available that would lessen the significant effects of the project.</p> <p>All mitigation measures that are potentially feasible should be included in the project’s environmental review. A measure brought to the attention of the lead agency should not be left out unless it is infeasible based on its elements.</p> <p>Consistent with CEQA Guidelines, the Department recommends the County consider agricultural conservation easements, among other measures, as potential mitigation. (See Cal. Code Regs., tit. 14, § 15370 [mitigation includes “compensating for the impact by replacing or providing substitute resources or environments, including through permanent protection of such resources in the form of conservation easements.”])</p> <p>Mitigation through agricultural easements can take at least two forms: the outright</p>	<p>This comment recommends requiring offsite mitigation to reduce the impact resulting from the conversion of agriculture land to non-agriculture uses. In a recent court case (King &amp; Gardiner Farms v County of Kern [2020]), the court found that a mitigation measure that requires conservation easements to cover off-site farmland would not provide adequate mitigation for the loss of farmland that would result from the project. Requiring this project to enter into binding agricultural conservation easements, as suggested in the comment letter, will not create new agricultural land, but would instead prevent the future conversion of agricultural land. Because an agricultural conservation easement would not offset the loss of agricultural land, and thereby mitigate the significant impact to agriculture, the City does not consider the suggested mitigation to be effective mitigation for the loss of agricultural land. It should also be noted that there are no other established agricultural farmland mitigation banks or agricultural farmland preservation programs in</p>

**Table 3.A: Comments and Responses Matrix**

Letter/ Comment Number	Comment	Response
	<p>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 easements. The conversion of agricultural land should be deemed an impact of at least regional significance. Hence, the search for replacement lands should not be limited strictly to lands within the project’s surrounding area.</p> <p>As discussed in the Agriculture and Forestry Resources section of the EIR, Madera County, “expressed concern regarding the establishment of new agricultural easements within the County in order to offset potential environmental impacts resulting from the conversion of agricultural land.”<sup>1</sup> Although the lead agency has expressed concerns with the use of agricultural easements within the County, it has not discussed the use of agricultural easements, or the donation of mitigation fees (in lieu-of fees), to areas outside of the County. As previously stated in the Department’s comments, the conversion of agricultural land should be deemed an impact of at least regional significance, and the search for replacement lands should not be limited strictly to lands within the project’s surrounding area.</p> <p>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. The Department suggests the lead agency revisit its consideration of agricultural easements, and/or the donation of mitigation in lieu-of fees to areas outside of its area of concern.</p>	<p>the vicinity of the Specific Plan Area that, through purchasing credits, would mitigate the impact related to the loss of agriculture land. In addition, conserving existing agriculture land within the Specific Plan Area would be considered infeasible, as it would not meet the objectives of the project. As a result, the suggested mitigation recommended in the comment letter is not considered feasible, and cannot be used to reduce the potential impacts related to the loss of agriculture land.</p>
A3-4	<p>Thank you for giving us the opportunity to comment on the Draft Environmental Impact Report for the Villages at Almond Grove Specific Plan Project. Please provide this Department with notices of any future hearing dates as well as any staff reports pertaining to this project. If you have any questions regarding our comments, please contact Farl Grundy, Associate Environmental Planner via email at <a href="mailto:Farl.Grundy@conservation.ca.gov">Farl.Grundy@conservation.ca.gov</a>.</p>	<p>This comment provides a closing to the comment letter and does not address the adequacy or completeness of the Draft EIR. No further response is necessary.</p>



**Table 3.A: Comments and Responses Matrix**

Letter/ Comment Number	Comment	Response
<b>Local Agencies</b>		
<b>B1 San Joaquin Valley Air Pollution Control District (January 12, 2022)</b>		
B1-1	<p>I left a voice mail to your number below requesting more information about this project. I am working on the commenting letter for the Villages at Almond Grove Specific Plan Draft EIR Project and I was hoping you can help me with the following items.</p> <ol style="list-style-type: none"> <li>1. Provide the CalEEMod Results (PDF) for Phase two and Phase three. Phase one was on the City of Madera’s website, but the second two were missing.</li> <li>2. Is the Villages at Almond Grove Specific Plan Draft EIR Project being driven by a developer or is the City’s project?</li> </ol> <p>Please feel free to contact me if you have any questions or concerns.</p>	<p>This comment was addressed to City staff and requests CalEEMod results and clarification on Specific Plan information. This comment does not address the adequacy or completeness of the Draft EIR; does not raise environmental issues; and does not request the incorporation of additional information relevant to environmental issues. Such comments do not require a response, pursuant to Section 15088(a) of the State CEQA Guidelines. No further response is necessary.</p>
B1-2	<p>Please accept my apology for the tardiness in replying to your email – I had fallen ill due to COVID and thus been out and still remain out of the office.</p> <p>My responses to your inquires are as follows:</p> <ol style="list-style-type: none"> <li>1. The Phase II CalEEMod results commences on page 243 of Appendices E made available on the City’s website. The Phase III CalEEMod results commences on page 595 of the same Appendices. I attached a copy of the Appendices for your convenience. Should you need further assistance in securing or reviewing the CalEEMod data, please contact Kyle Simpson of LSA, the preparer of the DEIR. Kyle is copied on this email. Kyle may be reached by phone 559.490.1212.</li> <li>2. The project is a “developer” initiated and driven project.</li> </ol>	<p>This comment is a response of City staff to request for clarification on Specific Plan information included in comment B1-1. This response does not address the adequacy or completeness of the Draft EIR; does not raise environmental issues; and does not request the incorporation of additional information relevant to environmental issues. No further response is necessary.</p>
<b>B2 San Joaquin Valley Air Pollution Control District (February 7, 2022)</b>		
B2-1	<p>The San Joaquin Valley Unified Air Pollution Control District (District) has reviewed the Draft Environmental Impact Report (DEIR) for the project referenced above from the City of Madera (City). The project is the Villages at Almond Grove Specific Plan (Specific Plan). The Specific Plan consists of a new mixed-use community which includes: 10,783 residential units, approximately 2.1 million square feet of non-residential development space (e.g. commercial, office, and industrial development), approximately 164 acres of parks and recreational area, and approximately 54 acres of public facilities, including schools. The Specific Plan will be located at the western edge of the City of Madera, bounded by the Fresno River to the south, Road 24 to the east, Avenue 17 to the north, and Road 22 to the west in Madera, CA (APN 033-180-002, 003).</p>	<p>This comment provides an introduction to the comment letter and provides a summary of the commenter’s understanding of the Specific Plan. This comment does not address the adequacy or completeness of the Draft EIR; does not raise environmental issues; and does not request the incorporation of additional information relevant to environmental issues. No further response is necessary.</p>

**Table 3.A: Comments and Responses Matrix**

Letter/ Comment Number	Comment	Response
	The District offers the following comments:	
B2-2	<p>1. Feasibility of implementing a Voluntary Emissions Reduction Agreement</p> <p>Per Table 4.3.J (Mitigated Maximum Annual Project Construction Emissions by Phase) and Table 4.3.L (Mitigated Project Operational Emissions) in the DEIR, the Specific Plan construction and operational emissions are expected to exceed the District’s significance thresholds, thus resulting in a significant impact on air quality. The District recommends that the DEIR be revised to include a discussion on the feasibility of implementing a Voluntary Emission Reduction Agreement (VERA) for the Specific Plan.</p> <p>A VERA is a mitigation measure by which the project proponent provides pound-for-pound mitigation of emissions increases through a process that develops, funds, and implements emission reduction projects, with the District serving a role of administrator of the emissions reduction projects and verifier of the successful mitigation effort. To implement a VERA, the project proponent and the District enter into a contractual agreement in which the project proponent agrees to mitigate project specific emissions by providing funds for the District’s incentives programs. The funds are disbursed by the District in the form of grants for projects that achieve emission reductions. Thus, project-related impacts on air quality can be mitigated. Types of emission reduction projects that have been funded in the past include electrification of stationary internal combustion engines (such as agricultural irrigation pumps), replacing old heavy-duty trucks with new, cleaner, more efficient heavy-duty trucks, and replacement of old farm tractors.</p> <p>In implementing a VERA, the District verifies the actual emission reductions that have been achieved as a result of completed grant contracts, monitors the emission reduction projects, and ensures the enforceability of achieved reductions. After the project is mitigated, the District certifies to the Lead Agency that the mitigation completed, providing the Lead Agency with an enforceable mitigation measure demonstrating that project-specific regional emissions have been mitigated to less than significant. To assist the Lead Agency and project proponent in ensuring that the environmental document is compliant with CEQA, the District recommends the Draft EIR includes an assessment of the feasibility of implementing a VERA.</p> <p>Additional information on implementing a VERA can be obtained by contacting District CEQA staff at by email at CEQA@valleyair.org or by phone at (559) 230-6000.</p>	<p>The commenter states that a Voluntary Emission Reduction Agreement (VERA) is a method available for mitigating criteria pollutant impacts. A VERA is often implemented at the project-level and would be developed with specific projects as they are proposed under the proposed Specific Plan. Mitigation Measure AIR-2.1 and Mitigation Measure AIR-2.2 include a series of measures to reduce project-related construction- and operational-period emissions. In addition, as future discretionary projects are proposed under the proposed Specific Plan, compliance with regulatory requirements of the SJVAPCD would be required. This comment provides additional information on implementation of a VERA agreement, which is noted. No additional response is required.</p>
B2-3	2. Recommended Feasible Mitigation To Reduce Operational Air Quality Impacts	This comment recommends the inclusion of several measures into the Draft EIR to address environmental impacts associated with the

**Table 3.A: Comments and Responses Matrix**

Letter/ Comment Number	Comment	Response
	<p>The San Joaquin Valley will not be able to attain stringent health-based federal air quality standards without significant reductions in emissions from heavy-heavy duty (HHD) Trucks, the single largest source of NOx emissions in the San Joaquin Valley. The District recently adopted the 2018 PM2.5 Plan which includes significant new reductions from HHD Trucks, including emissions reductions by 2023 through the implementation of the California Air Resources Board (CARB) Statewide Truck and Bus Regulation, which requires truck fleets operating in California to meet the 2010 0.2 g/bhp-hr NOx standard by 2023. Additionally, to meet the federal air quality standards by the 2020 to 2024 attainment deadlines, the District’s Plan relies on a significant and immediate transition of heavy duty truck fleets to zero or near-zero emissions technologies, including the near-zero truck standard of 0.02 g/bhp-hr NOx established by the California Air Resources Board.</p> <p>The Specific Plan is designed to construct non-residential development (e.g. industrial development which has the potential for warehouses). Industrial development has the potential to generate HHD Truck traffic, including HHD Trucks traveling to-and-from further trip length distances for potential distribution. To reduce impacts from operational mobile source emissions, the District recommends that the following mitigation measures be considered for inclusion in the Final EIR:</p> <ul style="list-style-type: none"> <li>● Advise fleets associated with project operational activities to utilize the cleanest available HHD truck technologies, including zero and near-zero (0.02 g/bhp-hr NOx) technologies as feasible.</li> <li>● Advise all on-site service equipment (cargo handling, yard hostlers, forklifts, pallet jacks, etc.) to utilize zero-emissions technologies as feasible.</li> <li>● Advise fleets to use best practices (i.e. eliminating unnecessary idling).</li> </ul>	<p>operation of non-residential uses in the Specific Plan Area. As noted on page 4.3-33 of the Draft EIR, operational impacts associated with implementation of the proposed Specific Plan would be considered significant and unavoidable. In accordance with the recommendations included in this comment, Mitigation Measure AIR-2.2 of the Draft EIR has been amended to include specific best management practices such as use of zero-emissions and near-zero technologies, as feasible. Please refer to Chapter 4.0 of this Final EIR to see the full text revision.</p>
B2-4	<p>3. Vegetative Barriers and Urban Greening</p> <p>The District suggests the City consider the feasibility of incorporating vegetative barriers and urban greening as a measure to further reduce air pollution exposure on sensitive receptors (i.e. church and school). The District recommends future development projects within the Specific Plan be evaluated for vegetative barriers and urban greening.</p> <p>While various emission control techniques and programs exist to reduce air quality emissions from mobile and stationary sources, vegetative barriers have been shown to be an additional measure to potentially reduce a population’s exposure to air pollution</p>	<p>This comment recommends the installation of vegetative barriers and urban greening to reduce air pollution exposure on sensitive receptors. The proposed Specific Plan includes Landscape Guidelines that promote sustainability with drought-tolerant or water-wise plant materials throughout the Specific Plan Area. In addition, the Specific Plan provides guidelines for open space throughout the Specific Plan Area includes parks, landscape corridors, natural open space, and trails and paseos. These design features provide breaks</p>

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	<p>through the interception of airborne particles and the uptake of gaseous pollutants. Examples of vegetative barriers include, but not limited to the following: trees, bushes, shrubs, or a mix of these. Generally, a higher and thicker vegetative barrier with full coverage will result in greater reductions in downwind pollutant concentrations. In the same manner, urban greening is also a way to help improve air quality and public health in addition to enhancing the overall beautification of a community with drought resistant low maintenance greenery.</p>	<p>from and between urban development throughout the Specific Plan Area. The further information provided in this comment is noted.</p>
B2-5	<p>4. Clean Lawn and Garden Equipment in the Community</p> <p>Since the Project consists of residential and commercial development, gas-powered residential and commercial lawn and garden equipment have the potential to result in an increase of NOx and PM2.5 emissions. Utilizing electric lawn care equipment can provide residents with immediate economic, environmental, and health benefits. The District recommends the project proponent consider the District’s Clean Green Yard Machines (CGYM) program which provides incentive funding for replacement of existing gas powered lawn and garden equipment. The District recommends future development projects within the Specific Plan be evaluated for clean lawn and garden equipment in the community.</p> <p>More information on the District CGYM program and funding can be found at: <a href="http://www.valleyair.org/grants/cgym.htm">http://www.valleyair.org/grants/cgym.htm</a> and <a href="http://valleyair.org/grants/cgym-commercial.htm">http://valleyair.org/grants/cgym-commercial.htm</a>.</p>	<p>The proposed Specific Plan includes Sustainability Guidelines that encourages the uses of landscape design strategies to minimize water use and provide greater efficiency to reduce energy consumption. Included as part of the Sustainability Guidelines are recommendations to install native plants and reduce the area of turf installed within the Specific Plan Area with the intention of reducing water use and limiting the need for landscaping equipment. Additionally, consistent with the latest California Building Code Standards, all residential units developed under the plan will include exterior electrical outlets to support the use of electric lawn care equipment. The further information provided in this comment is noted.</p>
B2-6	<p>5. Under-fired Charbroilers</p> <p>The proposed development project includes commercial use, which may potentially be occupied by restaurants. Should restaurants with under-fired charbroilers move in, the charbroilers may pose the potential for immediate health risk, particularly when located in densely developed locations near sensitive receptors. Since the cooking of meat can release carcinogenic PM2.5 species like polycyclic aromatic hydrocarbons, controlling emissions from new under-fired charbroilers will have a substantial positive impact on public health. The air quality impacts on neighborhoods near restaurants with under-fired charbroilers can be significant on days when meteorological conditions are stable, when dispersion is limited and emissions are trapped near the surface within the surrounding neighborhoods. As mentioned above, the project is located in an urban area with commercial and office buildings immediately adjacent to the project. A church and a high school is located northwest and south of the project. This potential for</p>	<p>This comment warns of the immediate health risk associated with under-fired char broilers and recommends that projects developed under the Specific Plan that include installation of under-fired char broilers should be assessed to considered whether particulate matter emission control systems could be installed. All future development proposals that contain under-fired char broilers will be evaluated for consistency with SJVPACD Rule 4692 for commercial charbroiling and will be evaluated for potential health effects during the discretionary review process. No changes to the Draft EIR are required.</p>

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	<p>neighborhood-level concentration of emissions during evening or multi-day stagnation events raises environmental concerns.</p> <p>Furthermore, reducing commercial charbroiling emissions is essential to achieving attainment of multiple federal PM2.5 standards and associated health benefits in the Valley. Therefore, the District recommends that if the future development projects within the Specific Plan include the installation of an under-fired charbroiler, a measure should be included requiring the assessment and potential installation, as technologically feasible, of particulate matter emission control systems for the project. The District is available to assist the City with this assessment. Additionally, to ease the financial burden for Valley businesses, the District is currently offering substantial incentive funding that covers the full cost of purchasing, installing, and maintaining the system for up to two years. Please contact the District at (559) 230-5800 or <a href="mailto:technology@valleyair.org">technology@valleyair.org</a> for more information.</p>	
B2-7	<p><b>6. Solar Deployment in the Community</b></p> <p>It is the policy of the State of California that renewable energy resources and zerocarbon resources supply 100% of retail sales of electricity to California end-use customers by December 31, 2045. While various emission control techniques and programs exist to reduce air quality emissions from mobile and stationary sources, the production of solar energy is contributing to improving air quality and public health. The District suggests that the City consider the feasibility of incorporating solar power systems, as an emission reduction strategy for future development projects within the Specific Plan.</p>	<p>Mitigation Measure GHG-1.1 requires the submittal of Greenhouse Gas Reduction Plans, or proof of compliance with the City’s Climate Action Plan (CAP). As part of the requirements, the Greenhouse Gas Reduction Plans would reference construction plans details and specifications to document implementation and compliance with the applicable CAP measures, including installation of solar photovoltaic (PV) systems. The further information provided in this comment is noted.</p>
B2-8	<p><b>7. Charge Up! Electric Vehicle Charger</b></p> <p>To support further installation of electric vehicle charging equipment and development of such infrastructure, the District offers incentives to public agencies, businesses, and property owners of multi-unit dwellings to install electric charging infrastructure (Level 2 and 3 chargers). The purpose of this incentive program is to promote clean air alternative-fuel technologies and the use of low or zero-emission vehicles. The District suggests that the City and project proponent consider the feasibility of installing electric vehicle chargers for future development projects within the Specific Plan.</p> <p>Please visit <a href="http://www.valleyair.org/grants/chargeup.htm">www.valleyair.org/grants/chargeup.htm</a> for more information.</p>	<p>Current plans for projects associated with the proposed Specific Plan do not provide sufficient detail to demonstrate whether projects include alternative fueling stations or electric vehicle (EV) charging stations. Mitigation Measure GHG-1.1 requires the submittal of Greenhouse Gas Reduction Plans, or proof of compliance with the City’s Climate Action Plan (CAP). Among the measures included in the City’s CAP that are considered to be applicable, feasible, and effective, is the inclusion of alternative fueling stations or electric vehicle (EV) charging stations within the Specific Plan Area. As part of the requirements, the Greenhouse Gas Reduction Plans would reference construction plans details and specifications to document implementation and compliance with the applicable CAP measures,</p>

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		including installation of EV charging stations. The further information provided in this comment is noted.
B2-9	<p>8. District Rules and Regulation</p> <p>The District issues permits for many types of air pollution sources and regulates some activities not requiring permits. A project subject to District rules and regulation would reduce its impacts on air quality through compliance with regulatory requirements. In general, a regulation is a collection of rules, each of which deals with a specific topic. Here are a couple of example, Regulation II (Permits) deals with permitting emission sources and includes rules such as District permit requirements (Rule 2010), New and Modified Stationary Source Review (Rule 2201), and implementation of Emission Reduction Credit Banking (Rule 2301).</p> <p>The list of rules below is neither exhaustive nor exclusive. Current District rules can be found online at: <a href="http://www.valleyair.org/rules/1ruleslist.htm">www.valleyair.org/rules/1ruleslist.htm</a>. To identify other District rules or regulations that apply to a project or to obtain information about District permit requirements, the applicant is strongly encouraged to contact the District’s Small Business Assistance (SBA) Office at (559) 230-5888.</p>	This comment states that future development projects within the Specific Plan Area may be subject to additional District rules. The Draft EIR, beginning on page 4.3-21 acknowledges that any District rules and regulations would apply to the development occurring within the Specific Plan Area. The further information provided in this comment is noted.
B2-10	<p>8a. District Rules 2010 and 2201 - Air Quality Permitting for Stationary Sources</p> <p>Stationary Source emissions include any building, structure, facility, or installation which emits or may emit any affected pollutant directly or as a fugitive emission. District Rule 2010 requires operators of emission sources to obtain an Authority to Construct (ATC) and Permit to Operate (PTO) from the District. District Rule 2201 requires that new and modified stationary sources of emissions mitigate their emissions using best available control technology (BACT).</p> <p>Future development projects within the Specific Plan may be subject to District Rule 2010 (Permits Required) and Rule 2201 (New and Modified Stationary Source Review) and may require District permits.</p> <p>Prior to commencing construction on any permit-required equipment or process, a finalized Authority to Construct (ATC) must be issued to the Project proponent by the District. For further information or assistance, the project proponent may contact the District’s Small Business Assistance (SBA) Office at (559) 230-5888.</p>	This comment provides information on District Rule 2010 (Permits Required) and Rule 2201 (New and Modified Stationary Source Review). Rule 2201 and permitting requirements of the District are discussed on pages 4.3-23 of the Draft EIR. Although no specific projects are proposed at this time, the Draft EIR acknowledges that any new or modified stationary/industrial source would be required to provide emission controls and offsets. The further information provided in this comment is noted.
B2-11	8b. District Rule 9510 (Indirect Source Review)	This comment provides information related to the District’s Rule 9510 (Indirect Source Rule). Rule 9510 is discussed on page 4.3-30

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	<p>The purpose of District Rule 9510 (Indirect Source Review) is to reduce the growth in both NOx and PM10 emissions associated with development and transportation projects from mobile and area sources associated with construction and operation of development projects. The rule encourages clean air design elements to be incorporated into the development project. In case the proposed project clean air design elements are insufficient to meet the targeted emission reductions, the rule requires developers to pay a fee used to fund projects to achieve off-site emissions reductions.</p> <p>The entire Project is subject to District Rule 9510 because it will receive a project-level discretionary approval from a public agency and will equal or exceed 9,000 square feet of space. When subject to the rule, an Air Impact Assessment (AIA) application is required prior to applying for project-level approval from a public agency. In this case, if not already done, please inform the project proponent to immediately submit an AIA application to the District to comply with District Rule 9510.</p> <p>An AIA application is required and the District recommends that demonstration of compliance with District Rule 9510, before issuance of the first building permit, be made a condition of Project approval.</p> <p>Information about how to comply with District Rule 9510 can be found online at: <a href="http://www.valleyair.org/ISR/ISRHome.htm">http://www.valleyair.org/ISR/ISRHome.htm</a>.</p> <p>The AIA application form can be found online at: <a href="http://www.valleyair.org/ISR/ISRFormsAndApplications.htm">http://www.valleyair.org/ISR/ISRFormsAndApplications.htm</a>.</p>	<p>the Draft EIR as an applicable law and regulation related to implementation of the proposed Specific Plan. The information provided in this comment is noted. No additional response is required.</p>
B2-12	<p>8c. District Rule 9410 (Employer Based Trip Reduction)</p> <p>Future development projects within the Specific Plan may be subject to District Rule 9410 (Employer Based Trip Reduction) if the project would result in employment of 100 or more “eligible” employees. District Rule 9410 requires employers with 100 or more “eligible” employees at a worksite to establish an Employer Trip Reduction Implementation Plan (eTRIP) that encourages employees to reduce single-occupancy vehicle trips, thus reducing pollutant emissions associated with work commutes. Under an eTRIP plan, employers have the flexibility to select the options that work best for their worksites and their employees.</p> <p>Information about how District Rule 9410 can be found online at: <a href="http://www.valleyair.org/tripreduction.htm">www.valleyair.org/tripreduction.htm</a>.</p>	<p>This comment provides information related to the District’s Rule 9410 (Employer Based Trip Reduction). Rule 9410 is an applicable law and regulation that may be related to future development occurring under the proposed Specific Plan. The information provided in this comment is noted. No additional response is required.</p>

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	For additional information, you can contact the District by phone at 559-230-6000 or by e-mail at etrip@valleyair.org	
B2-13	<p>8d. Other District Rules and Regulations</p> <p>Future development projects within the Specific Plan may also be subject to the following District rules: Regulation VIII, (Fugitive PM10 Prohibitions), Rule 4102 (Nuisance), Rule 4601 (Architectural Coatings), and Rule 4641 (Cutback, Slow Cure, and Emulsified Asphalt, Paving and Maintenance Operations). In the event an existing building will be renovated, partially demolished or removed, the project may be subject to District Rule 4002 (National Emission Standards for Hazardous Air Pollutants).</p>	This comment states that future development projects may be subject to additional District rules. It is acknowledged that project developed under the proposed Specific Plan would be required to comply with rules and regulations administered by the SJVAPCD. Future discretionary development proposals would require review by the SJVAPCD to identify any permitting requirements, including those identified in this comment.
B2-14	If you have any questions or require further information, please contact Harout Sagherian by e-mail at Harout.Sagherian@valleyair.org or by phone at (559) 230-5860.	This comment provides a closing to the comment letter and does not address the adequacy or completeness of the Draft EIR; does not raise environmental issues; and does not request the incorporation of additional information relevant to environmental issues. No further response is necessary.
<b>Organizations and Interested Parties</b>		
<b>C1 Pacific Gas and Electric Company (December 27, 2022)</b>		
C1-1	<p>Thank you for submitting The Villages at Almond Grove plans for our review. PG&amp;E will review the submitted plans in relationship to any existing Gas and Electric facilities within the project area. If the proposed project is adjacent/or within PG&amp;E owned property and/or easements, we will be working with you to ensure compatible uses and activities near our facilities.</p> <p>Attached you will find information and requirements as it relates to Gas facilities (Attachment 1) and Electric facilities (Attachment 2). Please review these in detail, as it is critical to ensure your safety and to protect PG&amp;E's facilities and its existing rights. Below is additional information for your review:</p> <p>This plan review process does not replace the application process for PG&amp;E gas or electric service your project may require. For these requests, please</p> <ol style="list-style-type: none"> <li>continue to work with PG&amp;E Service Planning: <a href="https://www.pge.com/en_US/business/services/building-and-renovation/overview/overview.page">https://www.pge.com/en_US/business/services/building-and-renovation/overview/overview.page</a></li> <li>If the project being submitted is part of a larger project, please include the entire</li> </ol>	This comment provides an introduction to the comment letter and describes the application process; it does not address the adequacy or completeness of the Draft EIR, does not raise environmental issues, and does not request the incorporation of additional information relevant to environmental issues. No further response is necessary.



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	<p>scope of your project, and not just a portion of it. PG&amp;E’s facilities are to be incorporated within any CEQA document. PG&amp;E needs to verify that the CEQA document will identify any required future PG&amp;E services.</p> <p>3. An engineering deposit may be required to review plans for a project depending on the size, scope, and location of the project and as it relates to any rearrangement or new installation of PG&amp;E facilities.</p> <p>Any proposed uses within the PG&amp;E fee strip and/or easement, may include a California Public Utility Commission (CPUC) Section 851 filing. This requires the CPUC to render approval for a conveyance of rights for specific uses on PG&amp;E’s fee strip or easement. PG&amp;E will advise if the necessity to incorporate a CPUC Section 851 filing is required.</p> <p>This letter does not constitute PG&amp;E’s consent to use any portion of its easement for any purpose not previously conveyed. PG&amp;E will provide a project specific response as required.</p>	
C1-2	<p>Attachment 1 – Gas Facilities</p> <p>There could be gas transmission pipelines in this area which would be considered critical facilities for PG&amp;E and a high priority subsurface installation under California law. Care must be taken to ensure safety and accessibility. So, please ensure that if PG&amp;E approves work near gas transmission pipelines it is done in adherence with the below stipulations. Additionally, the following link provides additional information regarding legal requirements under California excavation laws: <a href="https://www.usanorth811.org/images/pdfs/CA-LAW-2018.pdf">https://www.usanorth811.org/images/pdfs/CA-LAW-2018.pdf</a></p> <ol style="list-style-type: none"> <li>1. Standby Inspection: A PG&amp;E Gas Transmission Standby Inspector must be present during any demolition or construction activity that comes within 10 feet of the gas pipeline. This includes all grading, trenching, substructure depth verifications (potholes), asphalt or concrete demolition/removal, removal of trees, signs, light poles, etc. This inspection can be coordinated through the Underground Service Alert (USA) service at 811. A minimum notice of 48 hours is required. Ensure the USA markings and notifications are maintained throughout the duration of your work.</li> <li>2. Access: At any time, PG&amp;E may need to access, excavate, and perform work on the gas pipeline. Any construction equipment, materials, or spoils may need to be removed upon notice. Any temporary construction fencing installed within PG&amp;E’s easement would also need to be capable of being removed at any time upon notice.</li> </ol>	<p>This comment provides PG&amp;E stipulations for construction activities within the Specific Plan Area that occur near gas pipelines. This comment does not address the adequacy or completeness of the Draft EIR; does not raise environmental issues and does not request the incorporation of additional information relevant to environmental issues. In addition, future projects would be required to comply with any applicable regulatory requirements related construction and excavation. No further response is necessary.</p>

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	<p>Any plans to cut temporary slopes exceeding a 1:4 grade within 10 feet of a gas transmission pipeline need to be approved by PG&amp;E Pipeline Services in writing PRIOR to performing the work.</p> <p>3. Wheel Loads: To prevent damage to the buried gas pipeline, there are weight limits that must be enforced whenever any equipment gets within 10 feet of traversing the pipe.</p> <p>Ensure a list of the axle weights of all equipment being used is available for PG&amp;E's Standby Inspector. To confirm the depth of cover, the pipeline may need to be potholed by hand in a few areas.</p> <p>Due to the complex variability of tracked equipment, vibratory compaction equipment, and cranes, PG&amp;E must evaluate those items on a case-by-case basis prior to use over the gas pipeline (provide a list of any proposed equipment of this type noting model numbers and specific attachments).</p> <p>No equipment may be set up over the gas pipeline while operating. Ensure crane outriggers are at least 10 feet from the centerline of the gas pipeline. Transport trucks must not be parked over the gas pipeline while being loaded or unloaded.</p> <p>4. Grading: PG&amp;E requires a minimum of 36 inches of cover over gas pipelines (or existing grade if less) and a maximum of 7 feet of cover at all locations. The graded surface cannot exceed a cross slope of 1:4.</p> <p>5. Excavating: Any digging within 2 feet of a gas pipeline must be dug by hand. Note that while the minimum clearance is only 12 inches, any excavation work within 24 inches of the edge of a pipeline must be done with hand tools. So to avoid having to dig a trench entirely with hand tools, the edge of the trench must be over 24 inches away. (Doing the math for a 24 inch wide trench being dug along a 36 inch pipeline, the centerline of the trench would need to be at least 54 inches [<math>24/2 + 24 + 36/2 = 54</math>] away, or be entirely dug by hand.)</p> <p>Water jetting to assist vacuum excavating must be limited to 1000 psig and directed at a 40° angle to the pipe. All pile driving must be kept a minimum of 3 feet away.</p> <p>Any plans to expose and support a PG&amp;E gas transmission pipeline across an open excavation need to be approved by PG&amp;E Pipeline Services in writing PRIOR to</p>	

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	<p>performing the work.</p> <p>6. Boring/Trenchless Installations: PG&amp;E Pipeline Services must review and approve all plans to bore across or parallel to (within 10 feet) a gas transmission pipeline. There are stringent criteria to pothole the gas transmission facility at regular intervals for all parallel bore installations.</p> <p>For bore paths that cross gas transmission pipelines perpendicularly, the pipeline must be potholed a minimum of 2 feet in the horizontal direction of the bore path and a minimum of 12 inches in the vertical direction from the bottom of the pipe with minimum clearances measured from the edge of the pipe in both directions. Standby personnel must watch the locator trace (and every ream pass) the path of the bore as it approaches the pipeline and visually monitor the pothole (with the exposed transmission pipe) as the bore traverses the pipeline to ensure adequate clearance with the pipeline. The pothole width must account for the inaccuracy of the locating equipment.</p> <p>7. Substructures: All utility crossings of a gas pipeline should be made as close to perpendicular as feasible (90° +/- 15°). All utility lines crossing the gas pipeline must have a minimum of 12 inches of separation from the gas pipeline. Parallel utilities, pole bases, water line ‘kicker blocks’, storm drain inlets, water meters, valves, back pressure devices or other utility substructures are not allowed in the PG&amp;E gas pipeline easement.</p> <p>If previously retired PG&amp;E facilities are in conflict with proposed substructures, PG&amp;E must verify they are safe prior to removal. This includes verification testing of the contents of the facilities, as well as environmental testing of the coating and internal surfaces. Timelines for PG&amp;E completion of this verification will vary depending on the type and location of facilities in conflict.</p> <p>8. Structures: No structures are to be built within the PG&amp;E gas pipeline easement. This includes buildings, retaining walls, fences, decks, patios, carports, septic tanks, storage sheds, tanks, loading ramps, or any structure that could limit PG&amp;E’s ability to access its facilities.</p> <p>9. Fencing: Permanent fencing is not allowed within PG&amp;E easements except for perpendicular crossings which must include a 16 foot wide gate for vehicular access.</p>	

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	<p>Gates will be secured with PG&amp;E corporation locks.</p> <p>10. Landscaping: Landscaping must be designed to allow PG&amp;E to access the pipeline for maintenance and not interfere with pipeline coatings or other cathodic protection systems. No trees, shrubs, brush, vines, and other vegetation may be planted within the easement area. Only those plants, ground covers, grasses, flowers, and low-growing plants that grow unsupported to a maximum of four feet (4') in height at maturity may be planted within the easement area.</p> <p>11. Cathodic Protection: PG&amp;E pipelines are protected from corrosion with an "Impressed Current" cathodic protection system. Any proposed facilities, such as metal conduit, pipes, service lines, ground rods, anodes, wires, etc. that might affect the pipeline cathodic protection system must be reviewed and approved by PG&amp;E Corrosion Engineering.</p> <p>12. Pipeline Marker Signs: PG&amp;E needs to maintain pipeline marker signs for gas transmission pipelines in order to ensure public awareness of the presence of the pipelines. With prior written approval from PG&amp;E Pipeline Services, an existing PG&amp;E pipeline marker sign that is in direct conflict with proposed developments may be temporarily relocated to accommodate construction work. The pipeline marker must be moved back once construction is complete.</p> <p>13. PG&amp;E is also the provider of distribution facilities throughout many of the areas within the state of California. Therefore, any plans that impact PG&amp;E's facilities must be reviewed and approved by PG&amp;E to ensure that no impact occurs which may endanger the safe operation of its facilities.</p>	
C1-3	<p>Attachment 2 – Electric Facilities</p> <p>It is PG&amp;E's policy to permit certain uses on a case by case basis within its electric transmission fee strip(s) and/or easement(s) provided such uses and manner in which they are exercised, will not interfere with PG&amp;E's rights or endanger its facilities. Some examples/restrictions are as follows:</p> <p>1. Buildings and Other Structures: No buildings or other structures including the foot print and eave of any buildings, swimming pools, wells or similar structures will be permitted within fee strip(s) and/or easement(s) areas. PG&amp;E's transmission easement shall be designated on subdivision/parcel maps as "RESTRICTED USE AREA –</p>	<p>This comment provides PG&amp;E stipulations for construction activities within the Specific Plan Area that occur near electric facilities. This comment does not address the adequacy or completeness of the Draft EIR; does not raise environmental issues and does not request the incorporation of additional information relevant to environmental issues. In addition, future projects would be required to comply with any applicable regulatory requirements related construction and excavation. No further response is necessary.</p>

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	<p>NO BUILDING.”</p> <p>2. Grading: Cuts, trenches or excavations may not be made within 25 feet of our towers. Developers must submit grading plans and site development plans (including geotechnical reports if applicable), signed and dated, for PG&amp;E’s review. PG&amp;E engineers must review grade changes in the vicinity of our towers. No fills will be allowed which would impair ground-to-conductor clearances. Towers shall not be left on mounds without adequate road access to base of tower or structure.</p> <p>3. Fences: Walls, fences, and other structures must be installed at locations that do not affect the safe operation of PG&amp;E’s facilities. Heavy equipment access to our facilities must be maintained at all times. Metal fences are to be grounded to PG&amp;E specifications. No wall, fence or other like structure is to be installed within 10 feet of tower footings and unrestricted access must be maintained from a tower structure to the nearest street. Walls, fences and other structures proposed along or within the fee strip(s) and/or easement(s) will require PG&amp;E review; submit plans to PG&amp;E Centralized Review Team for review and comment.</p> <p>4. Landscaping: Vegetation may be allowed; subject to review of plans. On overhead electric transmission fee strip(s) and/or easement(s), trees and shrubs are limited to those varieties that do not exceed 15 feet in height at maturity. PG&amp;E must have access to its facilities at all times, including access by heavy equipment. No planting is to occur within the footprint of the tower legs. Greenbelts are encouraged.</p> <p>5. Reservoirs, Sumps, Drainage Basins, and Ponds: Prohibited within PG&amp;E’s fee strip(s) and/or easement(s) for electric transmission lines.</p> <p>6. Automobile Parking: Short term parking of movable passenger vehicles and light trucks (pickups, vans, etc.) is allowed. The lighting within these parking areas will need to be reviewed by PG&amp;E; approval will be on a case by case basis. Heavy equipment access to PG&amp;E facilities is to be maintained at all times. Parking is to clear PG&amp;E structures by at least 10 feet. Protection of PG&amp;E facilities from vehicular traffic is to be provided at developer’s expense AND to PG&amp;E specifications. Blocked-up vehicles are not allowed. Carpools, canopies, or awnings are not allowed.</p> <p>7. Storage of Flammable, Explosive or Corrosive Materials: There shall be no storage of fuel or combustibles and no fueling of vehicles within PG&amp;E’s easement. No trash bins</p>	

**Table 3.A: Comments and Responses Matrix**

Letter/ Comment Number	Comment	Response
	<p>or incinerators are allowed.</p> <p>8. Streets and Roads: Access to facilities must be maintained at all times. Street lights may be allowed in the fee strip(s) and/or easement(s) but in all cases must be reviewed by PG&amp;E for proper clearance. Roads and utilities should cross the transmission easement as nearly at right angles as possible. Road intersections will not be allowed within the transmission easement.</p> <p>9. Pipelines: Pipelines may be allowed provided crossings are held to a minimum and to be as nearly perpendicular as possible. Pipelines within 25 feet of PG&amp;E structures require review by PG&amp;E. Sprinklers systems may be allowed; subject to review. Leach fields and septic tanks are not allowed. Construction plans must be submitted to PG&amp;E for review and approval prior to the commencement of any construction.</p> <p>10. Signs: Signs are not allowed except in rare cases subject to individual review by PG&amp;E</p> <p>11. Recreation Areas: Playgrounds, parks, tennis courts, basketball courts, barbecue and light trucks (pickups, vans, etc.) may be allowed; subject to review of plans. Heavy equipment access to PG&amp;E facilities is to be maintained at all times. Parking is to clear PG&amp;E structures by at least 10 feet. Protection of PG&amp;E facilities from vehicular traffic is to be provided at developer’s expense AND to PG&amp;E specifications.</p> <p>12. Construction Activity: Since construction activity will take place near PG&amp;E’s overhead electric lines, please be advised it is the contractor’s responsibility to be aware of, and observe the minimum clearances for both workers and equipment operating near high voltage electric lines set out in the High-Voltage Electrical Safety Orders of the California Division of Industrial Safety (<a href="https://www.dir.ca.gov/Title8/sb5g2.html">https://www.dir.ca.gov/Title8/sb5g2.html</a>), as well as any other safety regulations. Contractors shall comply with California Public Utilities Commission General Order 95 (<a href="http://www.cpuc.ca.gov/gos/GO95/go_95_startup_page.html">http://www.cpuc.ca.gov/gos/GO95/go_95_startup_page.html</a>) and all other safety rules. No construction may occur within 25 feet of PG&amp;E’s towers. All excavation activities may only commence after 811 protocols has been followed.</p> <p>Contractor shall ensure the protection of PG&amp;E's towers and poles from vehicular damage by (installing protective barriers) Plans for protection barriers must be approved by PG&amp;E prior to construction.</p> <p>13. PG&amp;E is also the owner of distribution facilities throughout many of the areas within</p>	

**Table 3.A: Comments and Responses Matrix**

Letter/ Comment Number	Comment	Response
	<p>the state of California. Therefore, any plans that impact PG&amp;E’s facilities must be reviewed and approved by PG&amp;E to ensure that no impact occurs that may endanger the safe and reliable operation of its facilities.</p>	
<p><b>C2 Pacific Coast Producers (January 10, 2022)</b></p>		
<p>C2-1</p>	<p>Pacific Coast Producers received the Notice of Availability of a Draft EIR for the above referenced project. While we have not read the entire EIR as of yet, in reviewing the Executive Summary and the Transportation Chapters, we are concerned that the planned project does not take into consideration agricultural truck traffic during the harvest season. Both Avenue 16 and Avenue 17, as well as Road 23 are heavily used during the harvest season to transport commodities to processing facilities. In particular, Road 23, which runs through the heart of the planned project, is a traffic route for haulers of fruits and grapes and other commodities. This is especially concerning as the project plans for bike lanes, schools and commercial centers. The EIR discusses the Circulation Plan and the design of streets, corners, approaches and the like and discusses reduced vehicle speeds, but it does not discuss the potential hazards related to increased traffic during seasonal agricultural operations and the proximity of vulnerable populations. We would like an opportunity to discuss our concerns with you.</p>	<p>This comment expresses concerns regarding increases in traffic hazards along Avenues 16 and 17, and Road 23 within the Specific Plan Area during the harvest season. Implementation of the Specific Plan would increase vehicle traffic, which would require the improvement and expansion of the roadway network in the Specific Plan Area. The Specific Plan identifies a roadway system, bikeways, trails, and sidewalks that would be constructed in compliance with policy direction to facilitate transportation in the Specific Plan Area. New transportation facilities would be designed according to applicable federal, State, and local design standards, which would minimize traffic hazards. The minimum design speeds to be used for centerline curve radii, super elevation, corner and approach site distances, vertical and horizontal alignment, and sight distances for the Circulation Plan of streets would comply with City standards. As a result, the design of transportation facilities would improve safety and reduce conflicts by encouraging reduced vehicle speeds on roadways. The traffic improvements identified in the Specific Plan are based on the results identified in the Traffic Impact Assessment (TIA), which considers peak-hour performance of roadways within the Specific Plan Area upon completion of the Specific Plan. Potential traffic impacts resulting from temporary events like the harvest season are not relevant to this analysis. There are alternative routes within the City and County that haulers of agricultural commodities could take to reduce their impact on sensitive receptors within the Specific Plan Area. Therefore, traffic hazards along Avenues 16 and 17, and Road 23 during harvest season would be minimized through roadway design and adherence to the required traffic improvements identified in the TIA.</p>

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## 4.0 DRAFT ENVIRONMENTAL IMPACT REPORT TEXT REVISIONS

This chapter presents specific changes to the text of the Draft Environmental Impact Report (Draft EIR) that are being made to clarify any errors, omissions, or misinterpretation of materials in the Draft EIR in response to comments received during the public review period. In no case do these revisions result in a greater number of impacts or impacts of a greater severity than those set forth in the Draft EIR. Further, the additional text provided in the following revision is intended to amplify the existing mitigation regarding best practices, and does not constitute significant new information requiring recirculation of the Draft EIR. Where revisions to the main text is called for, the page and paragraph are set forth, followed by the appropriate revision. Added text is indicated with double-underlined text, and deleted text is shown in ~~strikeout~~.

### SECTION 4.4, AIR QUALITY

Mitigation Measure AIR-2.2, beginning on page 4.3-31 of the Draft EIR, is amended as follows:

- Mitigation Measure AIR-2.2** Prior to issuance of a building permit, the City of Madera Community Development Director or designee shall identify project design details and specifications, where feasible, to document implementation and compliance with the following emission reduction measures. Implementation of the following measures is considered to be applicable, feasible, and effective in reducing criteria pollutant emissions generated by the project:
- All Project Applicants shall provide Class I and Class II bicycle parking/storage facilities on-site. Bicycle parking facilities should be near destination points and easy to find. At least one bicycle parking space for every 20 vehicle parking spaces.
  - All employers shall provide shower and locker facilities to encourage employees to bike and/or walk to work, typically one shower and three lockers for every 25 employees.
  - All apartment complexes or condominiums without garages shall provide Class I bicycle parking.
  - All Project Applicants shall install Class I or II bike lanes on arterial/collector streets, or where a suitable route exists.
  - All Project Applicants shall provide building access and paths which are physically separated from street parking lot traffic and that eliminate physical barriers

such as walls, berms, landscaping and slopes that impede the use of pedestrians, bicycle facilities, or public transportation vehicles.

- All Project Applicants shall provide continuous sidewalks separated from the roadway by landscaping and on street parking.
- All Project Applicants shall provide on and off-site pedestrian facility improvements such as trails linking them to designated pedestrian commuting routes and/or on-site overpasses and wider sidewalks.
- All Project Applicants shall link cul-de-sacs and dead-end streets to encourage pedestrian and bicycle travel.
- All Project Applicants shall provide traffic reduction modifications to project roads, such as: narrower streets, speed platforms, bulb-outs and intersection modifications designed to reduce vehicle speeds and to encourage pedestrian and bicycle travel.
- All Project Applicants shall provide a parking lot design that includes clearly marked and shaded pedestrian pathways between transit facilities and building entrances.
- All Project Applicants shall provide pedestrian access between bus service and major transportation points and to destination points within the project.
- All Project Applicants shall provide a display case or kiosk displaying transportation information in a prominent area accessible to employees, residents, or visitors.
- All Project Applicants shall display bike route maps, bus schedules, and any other transportation information such as carpooling and car sharing.
- All Project Applicants shall design projects using models by the Local Government Commission (LGC) in the "Smart Growth Guidebook," such as: street block patterns that from an interconnected grid, short block faces, numerous alleys, and narrow streets.

- All Project Applicants shall develop and implement parking pricing strategies, such as charging parking lot fees to low occupancy (single occupant vehicles) vehicles.
- All Project Applicants shall provide preferential parking spaces near the entrance of buildings for those who carpool/vanpool/rideshare and provide signage.
- All Project Applicants shall install efficient heating, and other appliances, such as water heaters, cooking equipment, refrigerators, furnaces, and boiler units beyond Title 24 requirements.
- All Project Applicants shall use solar or low-emission water heaters and use central water heaters.
- All Project Applicants shall improve the thermal integrity/efficiency of buildings, and reduce the thermal load with automated and timed temperature controls or occupant sensors.
- All Project Applicants shall orient buildings to take advantage of solar heating and natural cooling and use passive solar designs.
- All employers shall implement at least one of the following: provide a guaranteed ride home; provide a carpool support system; provide a car-sharing services support system; provide a ride share program; employ or appoint an Employee Transportation Coordinator; provide incentives to employees to carpool/vanpool, take public transportation, telecommute, walk, and/or bike; participate in an employee "flash-pass" program, which provides free travel on transit buses; or provide transit pass subsidy and/or commute alternative allowance.
- If feasible, employers shall implement alternative work schedules such as compressed workweek schedules where weekly work hours are compressed into fewer than five days.
- Employers shall require fleets associated with project operational activities to utilize the cleanest available

HHD truck technologies, including zero and near-zero (0.02 g/bhp-hr NOx) technologies as feasible.

- Employers shall require all on-site service equipment (cargo handling, yard hostlers, forklifts, pallet jacks, etc.) to utilize zero-emissions technologies as feasible.
- Employers shall require fleets to use best practices (i.e. eliminating unnecessary idling).

Level of Significance With Mitigation: Significant and Unavoidable Impact.