



City of Reedley

Community Development Department
1733 Ninth Street
Reedley, CA 93654
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City of Reedley 2015-2023 MULTI-JURISDICTIONAL HOUSING ELEMENT Responses to Comments

March 8, 2016

Introduction

An initial study was prepared for the 2015-2023 Housing Element (“Project”) and circulated with a Notice of Intent to Adopt a Mitigated Negative Declaration (NOI) for a 30-day public review and comment period starting December 18, 2015 and ending January 19, 2016. A total of six letters were submitted to the City in response to the NOI. A list of those letters is provided herein. Please note that written responses to these comments are not required under the California Environmental Quality Act (CEQA) pursuant to Section 15074; however, to foster public participation and in the interest of cooperative communications with interested parties, the City has elected to prepare written responses to agency comments. Pursuant to Section 15074(b), “Prior to approving a project, the decision-making body of the lead agency shall consider the proposed negative declaration or mitigated negative declaration together with any comments received during the public review process.” The following comments will be presented to the City Council for consideration as required.

Letter	Description	Date
A	San Joaquin Valley Air Pollution Control District	12/30/15
B	Fresno Local Agency Formation Council	01/15/16
C	California Department of Transportation	01/20/16

Comment by San Joaquin Valley Air Pollution Control District



December 30, 2015

Kevin Fabino
City of Reedley
Community Development Department
1733 9th Street
Reedley, CA 93654

**Project: Initial Study, Negative Declaration –
City of Reedley 2015-2023 Housing Element (SCH # 2015121061)**

District CEQA Reference No: 20151058

Dear Mr. Fabino:

The San Joaquin Valley Unified Air Pollution Control District (District) has reviewed the above referenced project. Per the Initial Study (IS), the proposed project consists of the of the City of Reedley's 2015-2023 Housing Element. "The 2015-2023 Multi-Jurisdictional Housing Element applies to all proposed and existing residential and mixed-use General Plan land use designations and zoning districts that support residential or mixed use development ..." The Housing Element is a policy-level amendment and does not include any site-specific designs or proposals, nor does it grant any entitlements for development. Per the IS, "Future development proposals not exempt from CEQA will be subject to the environmental review process to identify potential impacts ..."

The District offers the following comments:

1. Project Air Quality Assessment

Quantification of Project related air quality impacts, such as construction emissions, operational emissions, and health impacts are to be assessed when project level details are available.

Future development may require further environmental review and mitigation. Referral documents for those projects should include a project summary detailing, at a minimum, the land use designation, project size, estimates of potential

Soyad Sadineidin
Executive Director - Public Health Division

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San Joaquin Valley Air Pollution Control District

construction, mobile and stationary emissions, and proximity to sensitive receptors and existing emission sources.

2. Health Assessment Screening

The District recommends that potential health risks be reviewed when approving future projects, including those that would otherwise appear to be exempt from CEQA requirements (such as uses allowed by right)

- a) From a health risk perspective, there are two types of land use projects that have the potential to cause long-term public health risk impacts: 1) those that locate new toxic sources in the vicinity of existing receptors and 2) those that locate new receptors in the vicinity of existing toxics sources.
- b) Specific consideration should be given when approving projects that could expose sensitive receptors to toxic air contaminants. Toxic air contaminants (TACs) are air pollutants identified by the State of California that may cause or contribute to an increase in risk exposure to the surrounding public, i.e. nearby residents and worksites (proposed or actual).

3. District Rule 9510 – Indirect Source Review

The District recommends that demonstration of compliance with District Rule 9510, including payment of all applicable fees, be made a condition of project approval.

Residential development projects would be subject to District Rule 9510 (Indirect Source Review) if upon full build-out the project would include or exceed 50 dwelling units. District Rule 9510 is intended to mitigate a project's impact on air quality through project design elements or by payment of applicable off-site mitigation fees.

If you have any questions or require further information, please call Georgia Stewart at (559) 230-5937.

Sincerely,

Arnaud Marjollet
Director of Permit Services



For: Brian Clements
Program Manager

AM: gs

Response to San Joaquin Valley Air Pollution Control District

This letter is informational and provides guidance to the City on the necessity for quantification of future project-related air quality impacts, on the siting of future residential developments near existing toxic sources, on exposure of receptors to Toxic Air Contaminants (TACs), and on the applicability of District Rule 9510 fee payment requirements. This letter does not question the adequacy of the analysis provided in the Initial Study and no additional explanation or edits to the Initial Study are required.

Comment by Local Agency Formation Commission



Fresno Local Agency Formation Commission

January 15, 2016

Kevin Fabino, Director of Community Development
City of Reedley, Community Development Department
1733 9th Street
Reedley, California 93354

Dear Mr. Fabino:

Subject: City of Reedley 2015-2023 Housing Element Update, Fifth Round

Thank you for including the Fresno Local Agency Formation Commission (LAFCO) in the environmental review process for the subject project. On behalf of LAFCO, the following comments are provided for your agencies' consideration.

LAFCO's is authorized by the Legislature to assist local governmental agencies to advantageously plan for their current and future needs of by appropriately matching growth with municipal services and resources. The Legislature recognized that providing housing for persons and families of all incomes is necessary for the social and fiscal well being of the state.¹

Pursuant to Cortese-Knox Hertzberg Local Government Reorganization Act of 2000 (CKH), Fresno LAFCO regulates, through approval or denial, of boundary changes proposed by a local agency or individuals. LAFCO's objectives are to:

- Encourage orderly formation and development of agencies;
- Encourage consistency with spheres of influence and recommend reorganization of agencies;
- Encourage orderly urban development and preservation of open space patterns;
- Encourage conservation of prime agricultural lands and open space areas;
- Identify and address disadvantaged unincorporated communities; and,
- Conduct service reviews of municipal services provided in the county.

CKH provides that LAFCOs consider regional growth goals and policies established by "collaboration of elected officials only, formally representing their local jurisdictions in an official capacity on a regional or sub-regional basis."² The result of this is to not only to involve LAFCO in housing issues by specifically emphasizing fair share housing needs, but to also give LAFCO the formal ability to consider regional growth goals as established by regional agencies, such as the Council of Governments (COG). LAFCO

¹ Government Code Section 56001.

² Government Code Section 56068.5.

January 15, 2016
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praises the City's collaboration with its fellow local agencies on the Fresno Multi-Jurisdictional 2015-2023 Housing Element coordinated by the Fresno COG.

Because the Commission regulates City growth, it is to the City's benefit that its long-range planning efforts, as well as municipal service planning, take the Commission's objectives into consideration. Future applications made LAFCo will be evaluated based on the request's consistency with CKH, and the Commission's Policies, Standards and Procedures. You are encouraged to review these documents and incorporate their requirements and standards into the future applications to the Commission. Links to these documents are provided below in footnotes.^{3,4}

Thank you for the opportunity to review and comment on the City of Reedley 2015-2023 Housing Element Update, Fifth Round. Please feel free to contact this office with any questions or comments.

Sincerely,



George W. Uc
LAFCo Analyst

³ <http://fresno.lafco.org/documents/2015/02/20150220knox%20act.pdf>

⁴ http://www.fresno.lafco.org/documents/2015/02/PSF_FINAL.pdf

Response to Local Agency Formation Commission

This is an informational comment letter summarizing the authority granted to the Fresno Local Agency Formation Commission (LAFCO) by State law and their objectives. The letter also recommends that the City consider the objectives of LAFCO in its planning efforts and in regards to future applications for changes in municipal services. The City recognizes the need to collaborate with LAFCO and other service providers when considering changes in municipal services and will coordinate with LAFCO upon application for such changes. This letter does not question the adequacy of the analysis provided in the Initial Study and no additional explanation or edits to the Initial Study are required.

Comment by California Department of Transportation

DEPARTMENT OF TRANSPORTATION

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*Serious drought
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January 20, 2016

06-PRE-GEN-GEN
Housing Element
City of Reedley

Mr. Kevin Fabino
Director of Community Development
City of Reedley
1733 9th Street
Reedley, CA 93654

Dear Mr. Fabino:

Thank you for the opportunity to review and comment on the Notice of Intent to Adopt a Negative Declaration or Mitigated Negative Declaration for the 2015-2023 Housing Element for the City of Reedley. Caltrans has the following comments:

- General Plan land uses, circulation and housing elements should be internally consistent and compatible with each other and externally compatible with Caltrans transportation facilities, their operations, safety and any regional or system plans.
- Housing placements that facilitate bicycle and pedestrian circulation for short distance trips are encouraged. Apply Americans with Disabilities Act (ADA) standards in all developments.
- The City should preserve adequate right-of-way for new and expanded transportation facilities. Long-range planning documents are being prepared for the State Highway System within Fresno County. Caltrans will work with the County and/or City to protect the State Highway System.
- The Fresno Regional Transportation Mitigation Fees are paid to ensure that future development contributes toward the cost to mitigate cumulative and indirect regional transportation impacts. If not already in place, the City should consider collecting traffic mitigation fees to mitigate impacts to major roads and intersections.

If you have any further questions, please contact David Padilla, Associate Transportation Planner, Transportation Planning at (559) 444-2493.

Sincerely,

A handwritten signature in blue ink, appearing to read "M. Navarro".

MICHAEL NAVARRO, Chief
Planning North Branch

*"Provide a safe, sustainable, integrated and efficient transportation system
to enhance California's economy and livability"*

Response to California Department of Transportation

This letter is informational and provides guidance to the City on General Plan land use consistency, Americans with Disabilities Acts (ADA) standards, the preservation of transportation rights-of-way, and traffic mitigation fees. This letter does not question the adequacy of the analysis provided in the Initial Study and no additional explanation or edits to the Initial Study are required.