

**MADERA
COUNTY
GENERAL
PLAN**



FINAL ENVIRONMENTAL IMPACT REPORT

VOLUME 2

OCTOBER 1995

9) PROGRAM EIR.

A) The Draft EIR is a Program EIR, which will govern a "continuing program," and a number of related projects. It is also noted that it will "streamline CEQA compliance for a broad range of subsequent projects." How does the Plan assure that the process will not become too streamlined so that impacts of individual projects are glossed over, and not given adequate consideration and weight? Will the preparation of a "Program EIR," facilitate easier passage of projects with significant impacts? If not, why not?

F1-15

Thank you for the opportunity to submit these comments on behalf of the Oakhurst Residents Association. We look forward to your response.

Sincerely,



Joann Eisenbrandt
Vice President for Communications

**MADERA COUNTY
GENERAL PLAN**

**FINAL ENVIRONMENTAL
IMPACT REPORT**

VOLUME II

**COMMENTS AND
RESPONSES TO COMMENTS**

SCH #93102017

October 1995

C) If, as the Draft Policy Document states under "Structure of the General Plan," that, "The goals and policies contained in the area plans supplement and elaborate upon, but do not supersede the goals and policies of the Draft Policy Document," is it appropriate to conclude that any policies our organization objects to in the Draft General Plan will become the policies of the Specific Plan unless challenged? In what ways can the Specific Plan alter the land use decisions and policies of the General Plan now nearing completion?

F-1-3

D) The Draft EIR states that existing General Plan (and Specific Plan) elements will be either validated, modified or rescinded. It notes, "The four area plans are generally consistent with the new General Plan, but will require some changes to maintain internal consistency; these will be modified through formal amendments." Does this mean that the 1980 Oakhurst-Ahwahnee Growth Management Plan will be amended to conform to the new General Plan and then the new Specific Plan will also have to conform, or, can the new Specific Plan (Chamber Grant) deviate from the new General Plan, and if so, how and to what extent?

F-1-4

2) LAND USE: CONFLICTS AMONG PLANS/ PRECEDENCE OF POLICIES.

A) To what extent can general land use policies expressed in the Draft General Plan be altered in future Specific Plans?

F-1-5

B) If the new General Plan is adopted, which land uses prevail in the interim between that adoption and the preparation and adoption of the new Specific Plan?

F-1-6

3) DRAFT LAND USE DIAGRAM.

A) The Draft EIR on page three notes that, "In most cases the Draft Land Use Diagram merely replaces existing land use designations directly with new designations, resulting in no substantive changes in planned land uses." With reference to the Oakhurst Area Inset Map that appears in the Draft EIR: 1) The lack of topographical and/or infrastructure (roadway) references, and the closeness in physical appearance among many land use designations (subtle shading, etc) make this map extremely difficult to interpret with any accuracy; 2) Why is this Map of a different shape, and why does it cover what appears to be a different area than that covered by the Oakhurst-Ahwahnee Growth Management Plan; 3) Does this Inset Map merely mostly "replace existing land use designations" with new ones (name changes) or is there a substantial change in land use philosophy, specifically with regard to land use configurations and groupings and land use intensities? 4) What percentage of land in the Oakhurst Area Inset Map has changed from low-impact/low intensity uses and/or larger required parcel sizes to more intensive commercial and/or residential uses?

F-1-7

B) The Draft EIR, page 3-5 notes that, "Many of the proposed changes to the Land Use Diagram bring the General Plan into conformance with existing or planned land uses." Land uses planned by whom? Existing specific or general plans, developers, creators of the Land Use Diagram?

F-1-8

4) RESPONSIBLE AGENCY FOR PREPARATION OF SPECIFIC PLAN.

A) The Draft Policy Document, page 16, indicates that the responsibility for preparation of the area plans lies with, in order, the Planning Department, Community Advisory Committees, Planning Commission and Board of Supervisors, with a Time Frame of Fiscal Year 94-95, with funding from the General Fund. How will the County be living up to this responsibility given that the Eastern Madera County Chamber of Commerce has obtained a grant and hired a planner to do the majority of work on the specific plan? What input will the County have into selection of Community Advisory Committees?

F-1-9

5) WATER SUPPLIES.

A) The Draft Policy Document, under Section 3 (C): Water Supply and Delivery (3.C.1), states, "The County shall approve new development only if an adequate water supply to serve such development is demonstrated." Further, the Draft EIR, p. 5-7 notes, "For purposes of this EIR, impacts are considered significant if adoption or implementation of the plan could result in approval of development without

F-1-10

**MADERA COUNTY GENERAL PLAN
FINAL ENVIRONMENTAL IMPACT REPORT**

**VOLUME II
COMMENTS AND RESPONSES TO COMMENTS**

SCH # 93102017

J. Laurence Mintier & Associates
H.T. Harvey & Associates
Dowling Associates
Brown-Buntin Associates
Donald Ballanti
Madera County Planning Department

October 1995

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San Joaquin River
Parkway and
Conservation Trust

SENT VIA TELECOPIER

September 12, 1994

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Mr. Leonard Garoupa
Planning Director
135 West Yosemite Ave.
Madera, CA 93637

Subject: Madera County General Plan Update DEIR

Dear Mr. Garoupa:

We are writing in response to your agency's request for comments on the Madera County General Plan Update Draft Environmental Impact Report. We are pleased to see that the draft goals and policies include the San Joaquin River Parkway.

We support the inclusion of the general goals and objectives of the Parkway described in Chapter Two of the Plan prepared by the San Joaquin River Parkway Task Force. Enclosed is a copy of Chapter Two as Attachment "A" to this letter. We would appreciate having an opportunity to meet with you and the appropriate planning consultants to discuss integrating these goals and policies into the Madera County General Plan.

Similarly, we request that the general goals and policies for the San Joaquin River Parkway be included in the Valley Children's/Gunner Ranch and Rio Mesa Area Plans. Goals and policies relating to the Parkway should be consistent within each of these documents.

The San Joaquin River Conservancy, the fifth such State agency, was established in 1992 by Assembly Bill 2452-Costa. The purpose of the Conservancy is to acquire and manage public lands within the San Joaquin River Parkway between Friant Dam and State Highway 99. It reads "it is the intent of the Legislature that the San Joaquin River Conservancy shall promote the parkway and coordinate efforts...". Supervisor Rick Jensen is chairman of the San Joaquin River Conservancy; your office may want to present a report regarding progress on planning efforts to the Conservancy at one of its upcoming meetings.

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E-5-1

INTRODUCTION

According to Section 15132 of the *State CEQA Guidelines*, final EIRs must contain the following information:

- (a) The draft EIR or a revision of the draft.
- (b) Comments and recommendations received on the draft EIR either verbatim or in summary
- (c) A list of persons, organizations, and public agencies commenting on the draft EIR.
- (d) The responses of the Lead Agency to significant environmental points raised in the review and consultation process.
- (e) Any other information added by the Lead Agency. (*Public Resources Code*).

This part (Volume II) of the *Final EIR* for the *Madera County General Plan* responds to items (b), (c), and (d), while Volume I, which is a comprehensive revision of the *Draft EIR*, addresses items (a) and (e). The following paragraphs describe the County's public review process for the *Draft EIR* and how this *Final EIR* addresses the requirements of the *State CEQA Guidelines* for responding to comments received on the *Draft EIR*.

DISTRIBUTION AND REVIEW OF THE DRAFT EIR

The *State CEQA Guidelines* requires that agencies preparing EIRs "provide adequate time for other public agencies and members of the public to review and comment on a draft EIR." (Section 15203). While the law does not generally define what constitutes adequate time, it does specify that draft EIRs submitted to the State Clearinghouse of the Governor's Office of Planning and Research should be subjected to a review period of at least 45 days. Section 15025 of the *State CEQA Guidelines* requires that draft EIRs for four classes of projects be submitted to the Clearinghouse: (1) those for which a state agency is the Lead Agency; (2) those projects for which a state agency is a Responsible Agency, Trustee Agency, or otherwise has jurisdiction over the project; (3) projects of statewide, regional, or areawide significance; and (4) reports prepared pursuant to the requirements of the National Environmental Protection Act (NEPA). The *Guidelines* (Section 15026 (b)(1) further defines local general plans as projects fitting into the third category above (i.e., projects of statewide, regional, or areawide significance).

In compliance with requirements described above, the County submitted copies of the *Draft EIR* on the *Madera County Draft General Plan* to the State Clearinghouse on July 5, 1994, thus initiating the mandatory 45-day review period. At the same time, the County distributed copies of the *Draft EIR* to numerous local agencies, organizations, and individuals with an interest in the General Plan Update. Based on requests, the County extended the 45-day review period through September 22, 1994.

The County received written comments on the *Draft EIR* during the review period. In addition, it received numerous comments on the *Draft General Plan* from the time the *Draft General Plan* was published in June 1994 through June 1995. In January 1995, the County published comments and preliminary responses to comments on the EIR and *Draft General Plan*. In June 1995, it published a second volume of comments and responses to comments on the *Draft General Plan*.

This document includes only those comments and responses that specifically address the EIR and that were submitted during the EIR comment period.



P. O. Box 1288 - North Fork, CA 93643-1288

September 7, 1994

RECEIVED

SEP 19 1994

J. LAURENCE MINTIER
& ASSOCIATES

Mr. Leonard Garoupa
Madera County
135 W. Yosemite Avenue
Madera, CA 93637

Dear Mr. Garoupa:

We would like you to add the following to the Draft Policy Document of the General Plan Update, Section 5; Agricultural and Natural Resources; Air Quality, General:

The San Joaquin Valley Unified Air Pollution Control District (SJVUAPCD) and the State of California now has admitted that the San Joaquin Valley is getting a very large amount of pollutants from the coast over Altamont Pass into our district. It is imperative that the communities and areas producing this pollution be required to help the SJVUAPCD in fighting to get better air quality in the our district.

E-4-1

Thank you for considering some form of a statement regarding this problem.

Sincerely,

Ronald Severe
President

copies to: Madera County Planning Commission
Madera County Board of Supervisors

P.O. Box 1288
North Fork CA.
93643-1288

Directors:

- Ronald Severe, President ~ 34321 Road 221 ~ North Fork, CA 93643 ~ Telephone (209) 877-2918
- W. Tom Wheeler, Vice President ~ P. O. Box 723 ~ North Fork, CA 93643 ~ Telephone (209) 877-4516
- Robert Peckinpah, Secretary ~ P. O. Box 1169 ~ North Fork, CA 93643 ~ Telephone (209) 877-4543
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- Willard Nelson ~ 50640 Road 200 ~ O'Neals, CA 93645 ~ Telephone (209) 868-3382
- Gena Hopkins ~ 33200 Road 221 ~ North Fork, CA 93643 ~ Telephone (209) 877-4901
- George Stafford ~ P. O. Box 7 ~ O'Neals, CA 93645 ~ Telephone (209) 868-3412

**SUMMARY OF COMMENTS AND
RESPONSES TO COMMENTS**

RENÉE J. MECCA
STAFF ANALYST



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FRESNO METROPOLITAN FLOOD CONTROL DISTRICT
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A. CITIES AND COUNTIES



E-3

FRESNO METROPOLITAN FLOOD CONTROL DISTRICT

File No. 550.30
San Joaquin River Area

September 16, 1994

RECEIVED

SEP 22 1994

J. LAURENCE MINTIER
& ASSOCIATES

Mr. Leonard Garoupa
Planning Director
Madera County Planning Department
135 West Yosemite Avenue
Madera, California

Dear Mr. Garoupa,

Comments on the Madera County General Plan Update

The Fresno Metropolitan Flood Control District appreciates the opportunity to review the draft Environmental Impact Report for the countywide Draft General Plan. The District believes the following considerations are relevant to the final Environmental Impact Report.

Section 4.4 "Drainage and Flood Control" of the draft Background Report, identifies problems created from rerouting and channelizing of creeks and channels. Our own experience shows such actions can cause significant flood problems and unanticipated shifts in drainage impacts. Because these issues are wholly internal to Madera County, we limit these comments to that of suggesting you may wish to consider them in your draft Policy Document (and draft EIR, if appropriate). We have found, in our own case, that the preservation of natural drainage/watercourses through easement dedication at the time of development is an effective approach.

E-3-1

Sections 4.4 and 7.3 of the draft Background Report, Sections 5.3 and 8.2 of the draft EIR, and Sections 3.E and 6.B of the draft Policy Document all depend solely on methodology and mitigation relative to the 100-year (1.0%) flood event. In a riverine environment, including those downstream of major structures, risks are far different than in typical sheet flow flood plains, which characterize most of the San Joaquin Valley floor. Because of several unique factors, the District continues to recommend that the Standard Project Flood (SPF) of 51,000 cfs (.4% event) be used as the flood protection standard for the San Joaquin River. This recommendation, which is being implemented in the District relative to the River, requires the developer to elevate the finish floor of buildings 1.0 foot above the level of the water surface associated with a flow of 51,000 cfs in the River. This will result in a uniform floodway in the River of sufficient capacity to achieve early flood warnings and evacuations, relative to uncontrolled riverine flows.

E-3-2

A-1 Madera County General Plan Update Advisory Committee (8/17/94)

A-1-1 Committee members did not recall recommending adoption of the Transportation and Circulation section of the Policy Document. Since the plan has been released for public review, the Committee can make written recommendations to the Planning Commission and Board of Supervisors.

Committee's recommendations and concerns over the Draft General Plan and EIR were included as a comment letter for consideration by the Planning Commission and Board of Supervisors.

A-1-2 Provisions of existing community or area plans will continue until updates of the community or area plans are adopted by the County.

Minor revisions to existing area plans were made to ensure consistency with the updated General Plan. Program 1.1 provides for updates of the existing area plans.

A-1-3 Law requires that zoning be consistent with General Plan designations. Table 1-1 in the *Background Report* is existing general plan designation/zoning consistency matrix.

After adoption of the General Plan, the County will take action to rezone areas that are inconsistent with the new General Plan designations. Program 8.3 provides for updating of the Zoning Ordinance, beginning in FY 1996-97. Table 1-1 of the Draft Background Report was made obsolete by adoption of the updated General Plan and was deleted from the final Background Report.

A-1-4 Questioned how many parcels will require zone changes to make them compatible with the updated General Plan.

No estimates have been made regarding the number of parcels or acreage that will require zone changes as a result of the updated General Plan. Most of the zone changes will be in the western part of the county where a more restrictive agricultural designation with a minimum parcel size of 36 acres was adopted as part of the new General Plan.

A-1-5 Plan will be subject of public review at subsequent meetings and hearings. Committee may submit comments.

No response necessary.

A-1-6 Corrections to Background Report on page 6-14 directional references.

Appropriate corrections were made.

A-1-7 The population figures in Table 9-4 on page 9-7 of the *Draft EIR* are incorrect.

Appropriate corrections were made.

A-1-8 Explanation of population and employment projections and allocations and buildout holding capacity.

No response necessary



San Joaquin Valley Unified Air Pollution Control District

September 12, 1994

C940506

Leonard Garoupa, Planning Director
Madera County Planning Department
135 W. Yosemite Avenue
Madera, CA 93637-3593

RE: Draft EIR - Madera County General Plan Update (SCH# 9310217)

Dear Mr. Garoupa:

The San Joaquin Valley Unified Air Pollution Control District (District) has reviewed the above referenced Draft EIR (DEIR) and offers the following comments:

General Plan Update Comments

The General Plan Update contains a number of policies and programs that will have beneficial effects on air quality. The policy language shows a strong commitment to ensure that the land use pattern and transportation system planned for the County will promote the use of alternatives to the single occupant automobile. The draft document contains many of the strategies contained in the District's Draft Air Quality Guidelines for General Plans. If the proposed policies are fully implemented, the rapid growth predicted for the County will cause less air pollutant emissions and reduce overall air quality impacts.

E-2-1

Draft EIR Comments

The DEIR provides adequate discussion of the potential air quality impacts related to the build out of the draft General Plan. The District strongly agrees with the conclusions of the DEIR. The growth in population and employment associated with development under the draft General Plan will result in a substantial increase in regional pollutants (ozone precursors - ROG and NO_x). Project impacts on regional air quality would remain significant and unavoidable even after implementation of the draft General Plan policies regarding air quality. The rapid growth rates in population and motor vehicle use in Madera County and the rest of the San Joaquin Valley offset a large amount of the emission reductions achieved through tighter tailpipe controls

E-2-2

David L. Crow
Executive Director/Air Pollution Control Officer

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Northern Region

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Southern Region

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A-1-17 Request to review the figures for agricultural conversion in the West/Agriculture, Chowchilla/Fairmead, and North Fork/Millerton areas.

The figures cited are estimates based on projected development in these areas. Nearly all growth in the West/Agriculture area is projected to occur in existing communities or as dwelling units on large agricultural parcels, without converting agricultural operations. Growth in Chowchilla is assumed to occur within Chowchilla's city limits, therefore no further conversion outside the current city limits is assumed as a result of Chowchilla's growth. Growth in the North Fork/Millerton areas is also projected at relatively low rates, resulting in some loss of grazing land.

A-1-18 Individual Committee member requested that sections in Chapter 9 of the EIR on Long-term Productivity, Irreversible Effects, and Growth Inducing Impacts be expanded.

Commentor does not explain what additional information should be discussed. The County believes these sections are adequate.

A-1-19 Revisions to the list of Committee members cited in the Plan.

Suggested revisions were made.

A-1-20 Plan will be reviewed by the Planning Commission and then go to the Board of Supervisors for adoption.

No response necessary.

MADERA COUNTY MOSQUITO
AND VECTOR CONTROL DISTRICT

900 NORTH GATEWAY DRIVE
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FOREMAN

STEVE DILLAHUNTY
SOURCE REDUCTION

September 9, 1994

To: Mr. Leonard Garoupa
Madera County Planning Department
135 W. Yosemite Ave.
Madera, CA. 93637

From: Steve Dillahunty
Source Reduction Officer
Madera County Mosquito and
Vector Control District

Subject: Comments on the Draft General
Plan Update for Madera County

Dear Mr. Garoupa:

After reading the Draft General Plan Update that has been prepared for Madera County, I believe I should submit several comments that are consistent with the Draft Update Plan as "an informational document which will inform public agency decision makers and the public generally."

The conversion of agricultural and grazing land to urban usages ultimately places residential areas, commercial interests, and schools in near proximity to developed agricultural properties. These properties, no matter what control measures are employed, inevitably produce at least some mosquitoes of several species which are both pests, and capable of transmitting diseases. To date, this is most evident to the District as the City of Madera expands to the west and includes new residential areas adjacent to developed farm land. E-1-1

Further, recent State and Federal legislation concerning environmental protection, combined with higher resistance levels in target species, severely limits the types of chemicals the District may use for mosquito control. Higher costs for recently developed control materials and methods of application adds another limitation to the District's effectiveness. E-1-2

A-3 City of Clovis (9/9/94)

A-3-1 The EIR should analyze the outer beltway connection from Copper Avenue connecting to SR 41 that is proposed in the City of Clovis' General Plan.

The beltway was analyzed in the countywide traffic model and it was not demonstrated to provide significant benefit to address traffic generated by projected growth in Madera County and therefore could not be justified or financed as part of the Madera County General Plan. Funding for this facility is also not secured in Fresno County as it is not a part of the County's Regional Transportation Plan. It is important to note that the Madera County General Plan does not, however, preclude development of such a facility. This roadway will be one of the river crossings considered in the study of future river connections (Program 2.8). Also see response to County of Fresno Public Works & Development Services Department (Comment A-4).

Mr. Leonard Garoupa
September 9, 1994
Page 3

On a more technical level, certain data in the draft EIR needs to be corrected or updated. On page 4-17, reference is made to the Madera Unified School District enrollment figures. Enclosed with this letter is a two-page document showing actual enrollment on September 6, 1994. The total K-12 enrollment on September 6 was 14,923 students. That figure will increase substantially in the next few weeks and will peak-out in October at between 15,300 and 15,500 students. Please note that these figures differ substantially from the figures used in the DEIR.

D-24

On page 4-18, reference is made to a planned junior high school in the Ranchos area. While the District has acquired a site for a junior high in the Ranchos, no specific plans for a school have been made. However, the Martin Luther King Junior Middle School on the east side of the City of Madera will open in September of 1995. It will alleviate overcrowding at the Jefferson School.

D-2-5

On page 5-45, both the enrollment figures and the student yield factors need to be corrected. The assumption, on page 5-46, of 25% multi-family residential development is invalid. Since other data, such as Table 5-10, depend upon a correct student yield factor, the other data will need to be corrected. A copy of the Development Fee Justification Study, prepared for the Madera Unified School District in August 1994 by Michael Paoli and Associates, contains the accurate information and data you will need to make these corrections. A copy of the Paoli study is enclosed with this letter.

D-2-6

On page 5-50, reference again is made to a junior high school in the Ranchos area. As noted above, while a site has been acquired, there are no current plans to build such a school.

D-2-5

Finally, the School District notes that the draft EIR and the draft Policy Document contain policies requiring and encouraging the joint development of recreation areas, turf areas, multi-purpose buildings and the like. The School District concurs with the need for these policies.

D-2-7

Thank you very much for the opportunity to comment on these documents. If you have any questions about these comments or if you need any additional data or information regarding the School District, please contact the

B. STATE AGENCIES

1. Bureau of
2. Department of
3. State Police

4. State
5. Department of

6. State

K L

LOZANO SMITH
SMITH WOLIVER & BEHRENS
ATTORNEYS AT LAW

September 9, 1994

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Christine A. Goodrich
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Mr. Leonard Garoupa
Director of Planning
County of Madera
209 West Yosemite Avenue
Madera, California 93637

Re: Madera Unified School District's Comments On
The County Draft General Plan Update And EIR

Ellen M. Jahn
Marcus D. Magness
Cheri D. Love
Nancy L. Klein
David J. Wolfe
Lynne O. Kelly
Sang-lin Nam
Peter K. Fagen
Carmen A. Ponce
Harold M. Freiman

Dear Mr. Garoupa:

I am writing on behalf of the Madera Unified School District to comment upon the June 1994 drafts of the Madera County General Plan and Environmental Impact Report. The specific documents I am commenting upon are the draft Background Report, the draft Policy Document and the draft Environmental Impact Report.

OF COUNSEL

Paul R. De Lay
Max E. Robinson
Patricia Andreen

OFFICES

San Rafael
Fresno
Monterey

A Professional
Corporation

The focus of the school district's review of these documents has been to determine whether the General Plan and the EIR adequately deal with the impact of population growth on School District facilities. As you know, the California Environmental Quality Act requires the County to adopt feasible mitigation measures (or feasible environmentally superior alternatives) in order to substantially lessen or avoid otherwise significant adverse environmental impacts (Cal. Pub. Resources Code, §§ 21002, 21081; CEQA Guidelines, §§ 15002, 15091.) For each significant effect, the EIR must identify specific mitigation measures. To be considered adequate, mitigation measures should be specific, feasible actions that will actually change adverse environmental conditions. Mitigation measures consisting only of further studies or consultation with other agencies that are not tied to a specific action plan may not be adequate and should be avoided. (*Sundstrom v. County of Mendocino* 202 Cal.App.3d 296.)

D-2-1

The EIR recognizes that population growth permitted by the draft General Plan would necessitate new school facilities in the Madera Unified School District and that the need for such facilities is a significant environmental impact.

D-2-2

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B-1 California Department of Transportation (9/12/94)

B-1-1 The EIR should model traffic based on full buildout of land in the Draft General Plan to link land use and transportation and should model all river crossings, as is Caltrans and CEQA policy.

The EIR projects residential and nonresidential growth through the year 2010 and links that growth to the roadway improvements needed by 2010 to serve that growth. The holding capacity of the Land Use Diagram does include more land than is projected for development by 2010, based on historical land use planning and the inclusion of major new growth areas. However, conclusions regarding forecasts of long-term growth projections substantially beyond 2010 and assumptions regarding future technological advances would be extremely speculative. Consistent with Section 15145 of the CEQA Guidelines which states that "if, after thorough investigation, a Lead Agency finds that a particular impact is too speculative for evaluation, the agency should note its conclusion and terminate discussion of the impact," the EIR concludes that evaluating the impacts of development substantially beyond 2010 would be far too speculative, given the uncertainty regarding trends that might affect growth 20 and 30 years hence and uncertainty of technological advances that may take place beyond 2010, particularly in the transportation industry.

In addition, modeling full buildout of the General Plan would not be a meaningful exercise, as some areas of the county might fully develop within 10 years while other areas of the county may have over 100 years of development potential. This would be similar to Caltrans planning improvements to the State's highway system based on buildout of all lands in the state designated for development. Clearly, this would not be a useful exercise and identifying funding to make such improvements would be impossible. To effectively plan for and fund roadway improvements, the General Plan chooses a time frame where projections can be made with some levels of certainty and where growth projections and roadway improvements are linked within a reasonable period for long-term planning.

The EIR concludes that the lack of roadway capacity is a significant impact, and identifies the need for additional capacity across the river and includes a program to participate in a study of additional roadway capacity across the San Joaquin River, in conjunction with Fresno County and other local agencies (Program 2.8). Since river crossings are a multi-county issue which will need to be planned and funded cooperatively, it would be premature to include additional facilities before such a study has been completed. When the appropriate improvements have been identified, the General Plan will be amended to include them.

B-1-2 Suggests that the LOS standard be C rather than D, unless particular area cannot achieve LOS C because of traffic characteristics or financial constraints.

This comment recommends a change in policy, and therefore, a change in EIR significance criteria. As described on page 4-4 of the EIR, in view of the current and projected financing conditions in Madera County, the County has adopted LOS D as a compromise between service level desires and potentially available funding.

B-1-3 Future studies of river crossing cannot used in lieu of mitigations.

The EIR identifies traffic service levels on SR 99 between Madera and the San Joaquin River as a significant impact. It further states that "since the preferred improvements are not identified at this time, and the County cannot guarantee the development and funding of additional capacity, the impact on SR



Charwanakee Joint School District

P.O. Box 400 • 33173 Road 222 #4 • North Fork, California 93643
(209) 877-6209 Fax (209) 877-4802
Philip O. Pendley, Ed. D.; Superintendent

September 7, 1994

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Leonard Garoupa
Madera County Planning Department
209 West Yosemite Avenue.
Madera, California 93638

Dear Leonard,

In response to the draft documents of the Madera County General Plan, I would like to say that, in most respects, it appears to be a reasonable plan for the growth and development of Madera County. However, as the Superintendent of two school districts I could not help but notice that public facilities and services such as water, roads, sewer and fire protection are dealt with in one manner while schools are dealt with in another. Specifically, the draft General Plan documents state that development "shall" mitigate the entire cost of the provision of services such as water, roads, sewer and fire protection while for schools the documents state that development "should" mitigate the cost of providing school facilities.

As we have discussed in the past, schools are a part of the total public facilities planning effort. To treat them differently seems to be inconsistent with what I have heard from the Planning Department and from the Board of Supervisors. The documents clearly refer to schools as public facilities and services in several places. On page 38 of the draft policy document, policy 3.B.1., it is stated, "the county shall require that new development pay its fair share of the cost of developing new facilities and services and upgrading existing public facilities and services". From the perspective of those of us who represent schools, this makes the document internally inconsistent. Schools, which are public facilities, are treated differently than other public facilities.

As the Superintendent of two school districts, I believe it is important that schools have language in the General Plan which is consistent with the language used for the mitigation of all other public facilities and services. This General Plan is one which Madera County will live with for many years after those of us who are currently involved are gone. We believe it is important to address this issue now,

D-1-1

Charwanakee Joint School District
DMOT Office
52996 Road 228 - P.O. Box 400
North Fork, California 93643
(209) 877-7144
FAX (209) 877-7147

North Fork School
33287 Road 228 - P.O. Box 707
North Fork, California 93643
(209) 877-2215
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Sierra View School
16436 Peala Road
Madera, California 93638
(209) 645-1122
FAX (209) 645-5161

Spring Valley School
46655 Road 200 - P.O. Box 9
O'Neals, California 93645
(209) 868-3343
FAX (209) 868-3407

B-2 California Department of Conservation, Division of Mines and Geology (8/19/94)

B-2-1 Recommends that Table 7-2 be deleted from the Background Report since it is dated and no longer reflects current seismic safety planning techniques used by state or federal agencies.

The table was removed from the Background Report.

B-2-2 Include maps of seismic zonation in the Background Report published by FEMA in 1991.

The maps are included in Appendix E of the Background Report.

B-2-3 Recommend that DMG Special Publication 42 be cited in the Background Report to support the statement that no active faults have been recognized in Madera County.

The citation will be added to the discussion in the Background Report.

B-2-4 Submitted a new bibliography of geologic reports to use as a scientific reference document.

The bibliography was included in Appendix E of the Background Report.

season most appropriate for accurate identification. Surveys should be based on field inspection, and not on prediction of occurrence based on habitat or physical features of the site. Guidelines for conducting adequate botanical surveys are available from the Natural Heritage Division of the California Department of Fish and Game at (916) 322-2493.

Should these surveys determine that listed, proposed, or candidate species may be affected by the proposed project, the Service recommends that the project proponent, in consultation with this office and the California Department of Fish and Game, develop a plan that mitigates for the project's direct and indirect impacts to these species and compensates for project-related loss of habitat. The mitigation plan also should be included in the environmental impact report. C-3-15

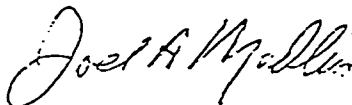
One of the benefits of considering candidate species as well as listed and proposed species early in the planning process is that by exploring alternatives, it may be possible to avoid conflicts that could develop, should a candidate species become listed before the project is complete. In addition, in instances where the Service addresses proposed projects under its Fish and Wildlife Coordination Act authority, we must also analyze the impacts on candidate species and make recommendations to mitigate any adverse effects.

SUMMARY:

The plan area contains large tracts of fish and wildlife habitat which, as a result of this plan, would be modified or lost. It is Service policy to recommend that significant natural resources, particularly wetlands, be avoided so that mitigation/compensation is not needed or is much reduced. We recommend that a watershed or ecosystem based habitat management plan be cooperatively developed between the Corps, EPA, Service, individual land holders, and the counties of Fresno and Madera, which will address the long-term impacts to wetlands and associated habitats. This plan should be developed prior to the development of any Specific Plans within the General Plan area. Without the incorporation of this measure and the other measures identified in the DEIR to reduce natural resource impacts, significant losses to the natural resources will occur within the Plan area. C-3-16

If you have any questions regarding these comments, please contact Mark Littlefield at (916) 978-5804 ext. 351.

Sincerely,



Joel A. Medlin
Field Supervisor

cc: RD (AFWE), FWS, Portland, OR

(page 7-43). Buffers provided within the Policy Document would be inadequate to mitigate these effects to a less-than-significant level. This analysis was not deferred to some later time during the planning process. Impacts to riparian habitats from other forms of development (pages 7-44 and 7-45) are similarly treated.

Foothill Habitats. The EIR clearly states that implementation of the updated general plan would eliminate or modify large areas of foothill habitats (these impacts cannot be quantified in the absence of specific plans) and would obstruct wildlife movement routes. The level of environmental impact is expected to be significant. The EIR concludes that impacts could not be mitigated to a less than significant level. This analysis was not deferred to some later time during the planning process.

B-3-2. The EIR fails to adequately identify biological resources in the county (pages 1, 2, and 3 of the comment letter). In fact, the letter implies that even a minimum level of specific resource assessment is absent from the document, and, therefore, "it is impossible to assess growth impacts, devise feasible mitigation measures, or provide for streamlined environmental review of subsequent projects." The CDFG recommends that disclosure of biological resources be based on CNDDDB information, resources identified during the environmental review for other projects (Rio Mesa Planning Area), and CDFG inventories. The total acreage of known sensitive resources should be included so that these could be compared with total acreage of predicted growth. A more full disclosure of biological resources would include:

1. A more comprehensive inventory of known sensitive wildlife resources in the county. The CDFG believes that discussion of several sensitive species was omitted from the document. Sensitive species not discussed included: a) Swainson's Hawk; b) Giant Garter Snake; c) Mountain Lion; and d) bears.
2. The document does not address the effects of additional growth on existing wildlife related recreational opportunity. It is likely that additional growth will result in both a decrease in private lands available for hunting and fishing opportunity and increased hunting and fishing pressure on remaining public and private lands.
3. Biological inventories of areas that appear to have both a high potential for supporting sensitive species and/or significant wildlife habitat and high potential for increased General Plan-related growth, agricultural expansion, or increased recreational use.

Existing biological resources of the county are identified in the Background Report and summarized in the Environmental Impact Report. The information provided in these documents must be sufficient to (1) permit an analysis of countywide impacts from development under the General Plan; (2) recommend General Plan policies which would mitigate significant environmental impacts; (3) determine whether significant environmental impacts would remain unmitigated, General Plan policies notwithstanding; and (4) provide direction for more thorough baseline surveys for area plans and project level EIRs. The section of the Background Report dealing with biological resources provides sufficient information to accomplish all four objectives.

It is important to note that the information found within the Background Report was derived from existing sources of information and field verified where possible. Detailed surveys for special status species, sensitive habitats, wildlife movement corridors, etc., were not conducted during the preparation of the Biological Resources section of the Background Report. Such surveys go far beyond the level of work typical of a general plan EIR. Rather, information-gathering activities included a careful review of the

Part of the Madera County planning area occurs within the breeding range of the peregrine falcon (*Falco peregrinus*) and contains suitable nesting habitat. The U.S. Fish and Wildlife Service would like to emphasize the importance of identifying and protecting suitable nesting habitat for this endangered species, to aid in its recovery. The Madera County Draft General Plan policy 5.E.1. addresses this issue in general. There is also suitable foraging and roosting habitat for wintering bald eagles (*Haliaeetus leucocephalus*). When specific projects are planned in these areas there should be site-specific analyses to determine whether the projects affect these federally listed species. If the analyses determine that the projects may affect these species, then consultation with the Fish and Wildlife Service would be required.

C-3-7

The Service wants to inform the Madera County planning staff that Mariposa pussypaws (*Calyptidium pulchellum*) and orange lupine (*Lupinus citrinus* var. *citrinus*) are Federal candidate 1 species and not FC2 as stated on page 6-44 of the DEIR. The Service also recommends that heartscale (*Atriplex cordulata*) and beaked clarkia (*Clarkia rostrata*) be added to the list of special status plants that occur in the county. Both these species are Federal candidate 2 species. Ewan's larkspur (*Delphinium hansenii* ssp. *ewanianum*) has been recommended to our Regional Office to be considered as a candidate 2 species. We request that Ewan's larkspur be added to the special status plant list as well.

C-3-8

The Service believes that implementation of proposed actions could affect the threatened Lahontan cutthroat trout (*Oncorhynchus [-Salmo] clarki henshawi*), Paiute cutthroat trout (*Oncorhynchus clarki seleniris*), and Kern Brook lamprey, (*Lampetra hubbsi*), a category 2 species. Fish species utilizing San Joaquin and Fresno river habitats could be affected if water is diverted or pumped, or river habitat is modified. The threatened Delta smelt is known to occur within Madera County. Salmon restoration efforts taking place in the San Joaquin river could be affected by habitat loss within the project area.

C-3-9

The project would also have significant impacts on the California tiger salamander (*Ambystoma californiense*), western spadefoot toad (*Scaphiopus hammondi hammondi*), western pond turtle (*Clemmys marmorata*), foothill yellow-legged frog, (*Rana boylei*), and California red-legged frog (*Rana aurora draytonii*). Mitigation is recommended to reduce the level of impacts.

C-3-10

The valley elderberry longhorn beetle (*Desmocerus californicus dimorphus*) will be affected when development occurs in montane riparian areas. Revegetation efforts are required as mitigation for impacts to elderberry plants which serve as habitat for the beetle. Invertebrates such as California linderiella (*Linderiella californica*), vernal pool fairy shrimp (*Branhinecta lynchii*), and Packard's tadpole shrimp (*Lepidurus packardi*), may be listed in the near future. Incidental take authority would be needed if listed shrimp species are located in habitat that is to be developed.

C-3-11

Surveys for San Joaquin kit fox (*Vulpes macrotis mutica*), Fresno kangaroo rat (*Dipodomys nitratoideis exilis*) and blunt-nosed leopard lizard (*Gambelia [-Crotaphytus] silus*) should utilize the protocol developed by the California Department of Fish and Game. Site mitigation for the San Joaquin kit fox

C-3-12

Guidelines does not indicate that future impacts to game animals will be significant because of a corresponding decline in hunting and fishing opportunities. There will, of course, be an increase in hunting and fishing pressure on undeveloped public and private lands, but both activities are regulated by the California Department of Fish and Game. The CDFG has imposed limits in the past on both hunting and fishing to better manage dwindling resources and presumably could and would do so again in the future.

In response to the concern that biological inventories should have been included which focused on vernal pool habitats, we wish to emphatically state that such inventories have been included. The Background Report describes in detail vernal pools (pages 6-23 and 6-24), their biotic values, their location (considerable time was spent analyzing aerial photographs in order to provide an accurate map of existing vernal pool complexes in the county) (Figures 6-11 and 6-13), and the sensitive plants and animals that occur in them, etc. From this information, it can be clearly discerned by planners, agency personnel, and average citizens, that proposed urban and rural growth in such areas are likely to result in significant impacts to these sensitive resources. Moreover, as discussed later, the EIR clearly identifies those features of the General Plan which will result in significant impacts to vernal pools. The Background Report does not identify individual vernal pools. There are several thousand such pools in Madera County (and an estimated 250 such pools in just the Rio Mesa New Growth Area). Mapping them all for the General Plan was neither feasible nor necessary. For a variety of reasons (CEQA, Clean Water Act permits, Endangered Species Act permits, etc.), vernal pool mapping will be necessary for individual projects located within known areas of vernal pools as identified in the Background Report.

Similarly, foothill habitats are thoroughly described in the Background Report and the information is used to assess impacts of the General Plan. Mapping these habitats (and others) at a level of detail which would permit the compilation of habitat by habitat acreage figures was not at all feasible. Foothill habitats of Madera County, for example, occur as a complicated mosaic, the detailed mapping of which far exceeds the scope of work appropriate for a General Plan EIR.

B-3-3 *Proposed growth in the county would result in more than double the current human water demand. This level of increase, in a county where water quantity and quality problems already exist, could likely result in impact to wildlife. Increased surface use of water, as currently proposed for the Rio Mesa area or reliance on springs could result in loss of wildlife and riparian habitat over broad areas. Drawdown associated with increased groundwater usage could impact sub-surface flows that support wildlife habitat. These effects need to be considered and an acceptable surface and groundwater supply-use balance established as a guiding feature of the plan.*

Flows of surface water in most rivers and creeks of the western San Joaquin Valley are the result of discharges of stored water in upstream reservoirs. The depth to groundwater in Madera is approximately 70 feet. The depth to groundwater in the vicinity of Rio Mesa and Madera Ranchos is in excess of 100 feet. Groundwater pumping has so lowered groundwater levels already that additional pumping will have at most localized effects on surface waters in creeks and rivers. Therefore, additional groundwater pumping in the western San Joaquin Valley, which is a critical concern for humans, will probably have only small localized effects on wildlife, or will have no effects at all.

Groundwater is highly localized in mountain areas since it is stored in fractures within the solid bedrock. Wells within mountain areas are commonly 300 to 500 feet in depth. Pumping of groundwater within mountain areas will have little effect on surface flows which, on many rivers and creeks have disappeared by early summer already. Therefore, additional impacts to wildlife resulting from additional groundwater pumping are unlikely to be substantial.

C-3



United States Department of the Interior

FISH AND WILDLIFE SERVICE
Ecological Services
Sacramento Field Office
2800 Cottage Way, Room E-1803
Sacramento, California 95825-1846

In Reply Refer To:
PPN 1598

September 12, 1994

Mr. Leonard Garoupa
Madera County Planning Department
135 West Yosemite Avenue
Madera, California

Subject: General Plan and Draft Environmental Impact Report, Madera County, California.

Dear Mr. Garoupa:

The U.S. Fish and Wildlife Service (Service) has reviewed the Madera County General Plan and Draft Environmental Impact Report (DEIR). These comments are intended to assist you in your review of the proposal, and will not take the place of any formal comments that may be required under the provisions of the Fish and Wildlife Coordination Act.

COMMENTS:

The DEIR evaluates the County's 1994 General Plan. Full development of the Plan would result in the loss a variety of wildlife habitats and species, including habitat for special status species. The DEIR has identified that implementation of the Plan would result in a significant loss of biological resources.

C-3-1

The Service recommends avoidance of both wetland and sensitive species habitats. It is our observation that mitigation for these habitats is rarely fully successful and it is often more cost and time effective to avoid sensitive habitats than to mitigate for their loss. For those unavoidable impacts, we recommend that mitigation be initiated prior to the onset of construction. If there will be a substantial time lag between project construction and completion of the mitigation, a net loss of habitat values would result, and more mitigation would be required to offset this loss.

C-3-2

Because of their very high value to migratory birds, and their ever-increasing scarcity in California, our mitigation goal for wetlands (including riparian, riverine, and vernal pool wetlands) is no net loss of in-kind habitat value or acreage (whichever is greater).

C-3-3

Under provisions of the Fish and Wildlife Coordination Act, the Service advises the U.S. Army Corps of Engineers (Corps) on projects involving dredge and fill activities in "waters of the United States", of which wetlands and

C-3-4

It is appropriate that such areas be identified for individual area plans, or for specific projects where area plans have not been prepared. Significant habitat areas have been sufficiently well identified in the General Plan EIR to give the County and the preparers of subsequent CEQA documents the necessary guidance for more detailed surveys.

B-3-9 As described in Policy 5.E.2, how will the areas known to have particular value for wildlife be defined and identified? Is this measure to apply to lands of low wildlife value than those discussed in Policy 5.E.1?

These lands are to be identified during CEQA review for area plans and/or specific projects. "Areas known to have particular value for wildlife" would include riparian areas, wetlands, known wildlife movement corridors, deer winter range, etc. Such areas have been generally identified in the Background Report.

B-3-10 It is impossible to insure the conservation of sufficiently large continuous expanses of native vegetation to provide suitable habitat for maintaining abundant and diverse wildlife as described in Policy 5.E.6 without identifying such areas prior to approval of land use changes.

It is the position of the EIR that such areas should be identified in sufficient detail to insure their conservation during the CEQA review process for area plans. It is altogether appropriate that the General Plan identify such areas sufficiently to ensure that subsequent EIRs delineate them in greater detail.

B-3-11 Regarding Policy 5.E.10, what is the definition of a significant ecological resource area? CDFG recommends that it be defined to include habitat where state or federally-listed threatened or endangered plants and animals could occur, or other special status species. Reconnaissance level surveys should include an assessment of habitat quality. Approval of discretionary projects should be based on the applicant's ability to avoid or mitigate impacts. This policy would be particularly effective if implemented in conjunction with a formal Habitat Conservation Plan.

Comment noted. The definition of significant ecological resource area was added to the glossary in the Policy Document.

B-3-12 Regarding Policy 5.E.11, the County will require a buffer with a minimum width of 150 feet between existing or planned urban development and what?

This policy reflects a goal of the San Joaquin River Parkway Plan, and presumably refers to a buffer between the wildlife corridor and existing or planned urban or suburban uses.

B-3-13 Suggests clarifying language to Background Report discussion regarding CDFG's and the U.S. Army Corps of Engineers' jurisdiction.

The Background Report was revised as suggested.

B-3-14 Encourages the County to prepare an additional Wildlife Element in order to provide adequate protection for wildlife resources.

Comment noted. The EIR preparers are familiar with the Tuolumne County Wildlife Project and concur with the CDFG that the approach taken by this project has considerable merit. Full implementation of

C-2



United States Department of the Interior

BUREAU OF RECLAMATION
South-Central California Area Office
2666 North Grove Industrial Drive, Suite 106
Fresno, California 93727-1551

IN REPLY REFER TO:

SCC-425
ENV-6.00

Mr. Leonard Garoupa
Madera County Planning Department
135 West Yosemite Avenue
Madera, California 93637

Subject: Madera County Draft General Plan

Dear Mr. Garoupa:

We appreciate the opportunity to review the Madera County Draft General Plan and offer the following comments:

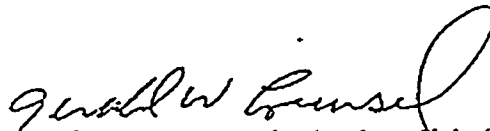
A. Please clarify Agriculture Exclusive designation, does it include grazing?] C-2-1

B. We recommend that a separate land use designation be developed for wetlands, riparian habitats, critical wildlife habitat, habitat for special status species, vernal pools, cultural resources, alkali desert scrub habitats and other environmentally-sensitive features.] C-2-2

C. Page 1-37, Background Report, Millerton Lake State Recreation Area is U.S. Government property managed under contract between the U.S. Bureau of Reclamation and California Department of Parks and Recreation.] C-2-3

If you have any questions concerning ours comments, please feel free to contact me at (209) 487-5255 or for the hearing impaired at (209) 487-5933.

Sincerely,


Gerald W. Townsend, Acting Chief
Natural Resource Management Branch
South-Central California Area Office

cc: Millerton Lake State Recreation Area
PO Box 205
Friant, California 93626

B-4 State Lands Commission (9/22/94)

B-4-1 Submitted a completed survey of the State's interests in the San Joaquin River bed.

Comment noted. The County will retain the information for use in future proposals in the area.



REPLY TO
ATTENTION OF

DEPARTMENT OF THE ARMY
U.S. ARMY ENGINEER DISTRICT, SACRAMENTO
CORPS OF ENGINEERS
1325 J STREET
SACRAMENTO, CALIFORNIA 95814-2922

September 12, 1994

Regulatory Section (199400520)

Madera County Planning Department
Attn: Mr. Leonard Garoupa
135 West Yosemite Avenue
Madera, California 93637

Dear Mr. Garoupa:

I am responding to the Draft Environmental Impact Report for Madera County General Plan, State Clearing House Number 93102017.

The Corps of Engineers jurisdiction within the study areas is under the authority of Section 404 of the Clean Water Act for the discharge of dredged or fill material into waters of the United States or excavation that has more than minimal effect on the aquatic environment in these waters. Waters of the United States include, but are not limited to, the following: the San Joaquin River, perennial and intermittent streams, lakes, ponds, vernal pools, as well as wetlands in marshes, wet meadows, and side hill seeps. Project features that would occur from development within the study areas that result in the discharge of fill material into waters of the United States will require Department of the Army authorization prior to initiating work.

The range of alternatives considered should include alternatives to fill in wetlands or other waters of the United States within the study area. Every effort should be made to avoid project features which require fill or excavation of waters of the United States. In the event it can be clearly demonstrated there are no practicable alternatives to filling waters of the United States, mitigation plans should be developed to compensate for the losses resulting from project implementation.

Please refer to identification number 199400520 in any future reference concerning this project. If you have any questions, please write to Ms. Kathy Norton, Room 1444, or telephone (916) 557-5260. We would like to work with you to preserve the waters of the United States in your County.

Sincerely,

Tom Coe
Chief, Central Valley Office

C. FEDERAL AGENCIES

STATE LANDS COMMISSION

LEO T. McCARTHY, *Lieutenant Governor*
GRAY DAVIS, *Controller*
RUSSELL S. GOULD, *Director of Finance*

EXECUTIVE OFFICE
1807 - 13th Street
Sacramento, CA 95814-7187
ROBERT C. HIGHT
Executive Officer

September 22, 1994

File Ref.: 93102017

Mr. James T. Burroughs
Projects Coordinator
The Resources Agency
1416 Ninth Street
Sacramento, CA 95814

Attention: Nadel Gayou

Mr. Leonard Garoupa, Director
Madera County Planning Department
135 West Yosemite Avenue
Madera, CA 93637

Dear Mr. Burroughs and Mr. Garoupa:

Staff of the State Lands Commission (SLC) has reviewed the Draft Environmental Impact Report (DEIR) for the Madera County General Plan, SCH 93102017.

We apologize for the lateness of our comments and would appreciate their consideration by the County. Under the California Environmental Quality Act (CEQA), the County is the Lead Agency and the SLC is a Responsible and/or Trustee Agency for any and all projects which could directly or indirectly affect sovereign lands, their accompanying Public Trust resources or uses, and the public easement in navigable waters.

A review of our files indicates that, by letter dated November 15, 1993, SLC staff provided comments to the NOP for this document with regard to our jurisdiction over both State sovereign and school/lieu lands included within the County. The following is offered to supplement those previous comments.

With regard to State sovereign interests in the San Joaquin River, SLC staff has completed a survey of the State's interests in the bed of the River from Friant Dam to Highway 99. A copy of that survey is attached for your information and reference.] B-4-1

Thank you for the opportunity to comment. If you have any questions concerning the SLC's jurisdiction, please contact Curtis L. Fossum, Senior Staff Counsel, Southern California

C-1 U. S. Army Corps of Engineers (9/12/94)

C-1-1 Reiterated the Corps' jurisdiction as it pertains to wetlands and suggests that the County consider alternatives to filling in wetlands when it considers development projects.

Policy 5.D.1 requires the County to comply with the wetlands policies of the U.S. Army Corps of Engineers and other agencies, and according to Policy 5.D.2, the County shall require new development to mitigate wetland loss through any combination of avoidance, minimization, or compensation. Avoidance will be considered in the County's review of development projects.

FISH AND WILDLIFE HABITAT (pages 7-39 and 40)

5.E.1. - Habitat must be identified and programmatic standards adopted prior to approval of land use changes for this policy to be effective.

B-3-8

5.E.2. - How will these areas be defined and identified? Is this measure to apply to lands of lower wildlife value than those discussed in 5.E.1?

B-3-9

5.E.6. - It is impossible to insure the conservation of sufficiently large continuous expanses of native vegetation to provide suitable habitat for maintaining abundant and diverse wildlife without identifying such areas prior to approval of land-use changes.

B-3-10

5.E.10. - What is the definition of a significant ecological resource area? We recommend that it be defined to include habitat where State or Federally-listed Threatened Endangered candidate, sensitive or species of special concern could occur. Reconnaissance level surveys should include an assessment of habitat quality. Approval of discretionary projects should be based on the applicants ability to avoid or mitigate impacts. This policy would be particularly effective if implemented in conjunction with a formal Habitat Conservation Plan.

B-3-11

5.E.11. - The County will require a buffer with a minimum width of 150 feet between existing or planned urban development and what?

B-3-12

DRAFT BACKGROUND REPORT

1. Agencies With Permitting Authority pages 1-35 and 1-36

The Department has jurisdiction over not only waters containing fish and wildlife resources but also over any stream or lake as defined in the State Resources Code (sections 1.56 and 1.72). We consider seasonal or ephemeral streams designated waters for purposes of notification pursuant to Fish and Game Code Sections 1600 et. seq. This State law requires notification of the Department in advance of beginning projects that substantially divert, obstruct, or change the natural flow or the bed, bank or channel of any stream or lake designated by the Department.

B-3-13

The United States Army Corps of Engineers authority extends to vernal pools and other wetlands under section 404 of the Clean Water Act.

2. Agencies with Review Authority page 1-36

C-3 U.S. Department of the Interior, Fish and Wildlife Service (9/12/94)

C-3-1 Development under the Draft General Plan would result in a loss of a variety of wildlife habitats and species, including habitat for special status species. The EIR concludes the implementation of the plan would result in a significant loss of biological resources.

This comment reiterates the conclusions of the EIR. No response is necessary.

C-3-2 Suggests that the best method to protect habitats is by avoidance of wetland and sensitive species habitats, as other mitigation efforts are rarely fully successful and often more costly than avoidance. For those unavoidable impacts, USFWS recommends that mitigation be initiated prior to the onset of construction to avoid any lag between project construction and completion of mitigation.

Comment noted. The General Plan provides for addressing wetlands and sensitive species impacts through avoidance, minimization, or compensation. The EIR concludes that some wetland areas will be developed and will require off-site mitigation. Mitigation for specific projects will be addressed through consultation with all appropriate agencies.

C-3-3 USFWS goal for wetland mitigation is non-net-loss of in-kind habitat value or acreage (whichever is greater).

Policy 5.D.1 states, in part, that "the County shall comply with the wetlands policy of the U.S. Army Corps of Engineers, the U.S. Fish and Wildlife Service, and the California Department of Fish and Game." This policy also requires coordination with these agencies.

C-3-4 States the criteria used by the USFWS in advising the U.S. Army Corps of Engineers on projects involving dredge and fill activities, including wetlands some riparian categories; the USFWS may recommend the "no project" alternative for those projects which do not meet all its criteria.

Comment noted.

C-3-5 The USFWS recommends full mitigation for any impacts on fish and wildlife with the following elements, in order of desirability: 1) avoiding the impact, 2) minimizing the impact, 3) rectifying the impact, 4) reducing or eliminating impact over time, 5) compensating for impact.

Policy 5.D.2 generally supports these efforts to address wetlands impacts.

C-3-6 Considers the source used in the EIR for habitat names somewhat dated, recommends a different source.

The revised source recommended by the USFWS is still in draft form, and is therefore not considered appropriate to use for the purposes of this EIR. In addition, using a revised system would not change any of the conclusions of the EIR.

2. Biological inventories of areas that appear to have both a high potential for supporting sensitive species and/or significant wildlife habitat and a high potential for increased General-Plan-related growth, agricultural expansion or increased recreational use

a. There is an approximately seven to twelve-mile-wide strip of annual grassland that bisects the County just east of Madera that contains a substantial portion of the potential sensitive species habitat identified in the Draft EIR (see figures 6-12 and 6-13 in the Draft Background Report). This area also lies where growth is projected to increase at, buildout, up to ten fold (see figure 2-2 and table 2-13 in the Draft EIR). Biological resources in this area need to be more completely assessed prior to adoption of a General Plan and it's land use designations.

b. Much of the remainder of the foothill area west of the national forest supports a significant wildlife resources (oak woodland, riparian habitat, resident and migratory deer habitat), yet the General Plan forecasts a significant amount of growth (much of it in the form of rural residential or other very low density agricultural zoning-related usage) in this area. Impacts to wildlife resources in this area are likely to be severe due to extreme fragmentation and degradation of habitat areas, erosion, and disturbance to riparian systems, traffic, noise, illumination, and other features associated with sprawling low-density growth. In order to clearly disclose and mitigate these impacts to biological resources (including riparian systems), the resources need to be inventoried before as a part of directing any degree of new growth into this area. The General Planing level is the appropriate planning stage to complete this assessment, for once the land use and public expectations are established, the requirement to mitigate these resources is typically viewed as a "late hit".

3. Assessment of effects of increased water use on wildlife resources

Plants and wildlife are dependent on water for survival. Proposed growth in the County would result in more than double the current human water demand. This level of increase, in a County where water quantity and quality problems already exist, could likely result in impacts to wildlife. Increased use of surface water, as currently proposed for the Rio Mesa area or reliance on springs could result in loss of wildlife and riparian habitat over broad areas. Drawdown associated with increased groundwater usage could impact sub-surface flows that support wildlife habitat. These effects need to be considered and an acceptable surface and ground water supply-use balance established as a guiding feature of the plan.

C-3-14 The County must address the regulatory requirements of the federal Endangered Species Act of 1973 as amended, including either federal consultation or an "incidental take" requirement for any taking of a federally listed fish and wildlife species.

Comment noted.

C-3-15 Recommend that appropriately designed surveys for listed, proposed, or candidate species be undertaken by qualified biologists. If such a survey indicates that a listed, proposed, or candidate species would be affected, a mitigation plan for the proposed project's impacts should be developed in consultation with the USFWS and CDFG. Including candidate species early in the planning process, it may be possible to avoid conflicts if species become listed before the project is complete.

Comment noted. Site-specific surveys will be required at the time of area plan, specific plan, or development project environmental review. General Plan policies require identification and mitigation of impacts on special status species, including candidate species. The General Plan and EIR identify candidate species in Madera County, since many of these species are likely to change status within the life of the plan.

C-3-16 Madera County contains large areas of fish and wildlife habitat which would be modified or lost as a result of implementation of the Draft General Plan. Recommend that significant natural resources, particularly wetlands, be avoided. Also recommend that the County develop a habitat management plan with multi-agency and landowner participation prior to development of any specific plans in the county.

This comment supports the conclusions of the EIR. Policy 5.E.4 calls for the County to consider developing a formal habitat conservation plan.

DEPARTMENT OF FISH AND GAME



REGION 4
 1234 East Shaw Avenue
 Fresno, CA 93710
 (209) 445-6152

August 23, 1994

Mr. Leonard Garoupa
 Madera County Planning Department
 135 West Yosemite Avenue
 Madera, California 93637

Dear Mr. Garoupa:

Madera County General Plan Update
 Draft Environmental Impact Report (EIR)
 SCH #93102017

We have reviewed the Draft EIR for the project referenced above, a comprehensive update of the Madera County General Plan. The EIR attempts to provide a thorough assessment of impacts associated with growth and define appropriate mitigation measures to reduce or eliminate significant effects.

Plant and wildlife resources exist in the planning area that will be significantly adversely affected by growth at the levels proposed in the General Plan Update. We believe these resources have not been thoroughly described in the Draft EIR, nor have mitigation measures, frameworks or standards been proposed that would reduce these impacts to less-than-significant levels, in either the general plan, specific plan or individual project stages. We also believe that the document, intended to function as both a Program EIR and Master Environmental Assessment, fails to provide the level of analysis necessary to streamline, expedite or simplify subsequent environmental review, as discussed on pages 3 and 4 of the Draft. Even the broadest level of analysis is essentially postponed to later project development stages at the expense of both wildlife which will be deprived of the benefits afforded by early analysis, and county residents, prospective residents, land owners and developers who will likely incur unanticipated difficulty and expense when trying to accommodate growth as planned. Our specific comments follow.

B-3-1

DISCLOSURE OF BIOLOGICAL RESOURCES

The Document does not adequately identify biological resources in the planning area. Absent at least a certain minimum level of specific resource assessment it is impossible to assess growth impacts, devise feasible mitigation measures, or provide for streamlined environmental review of subsequent projects. This necessary level of base-line resource assessment appears to not only be lacking with respect to biological resources but also with respect to other factors that contribute to biological resource impacts such as water resources and air quality.

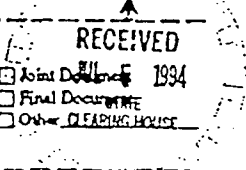
B-3-2

D. SCHOOL DISTRICTS

Project Title: Madera County General Plan Update
 Lead Agency: Madera County Planning Department Contact Person: Leonard Garoupa
 Street Address: 135 West Yosemite Avenue Phone: (209) 675-7821
 City: MADERA Zip: 93637 County: MADERA

Project Location
 County: Madera City/Nearest Community: all unincorporated areas of Madera County
 Cross Streets: _____ Zip Code: _____ Total Acres: _____
 Assessor's Parcel No. _____ Section: _____ Twp. _____ Range: _____ Base: _____
 Within 2 Miles: State Hwy #: _____ Waterways: _____
 Airports: _____ Railways: _____ Schools: _____

Document Type
 CEQA: NOP Supplement/Subsequent NEPA: NOI Other: Joint Decree 1994
 Early Cons EIR (Prior SCH No.) EA Final Document
 Neg Dec Other _____ Draft EIS FONSI Other CLEARING HOUSE



Local Action Type
 General Plan Update Specific Plan Rezone Annexation
 General Plan Amendment Master Plan Prezone Redevelopment
 General Plan Element Planned Unit Development Use Permit Coastal Permit
 Community Plan Site Plan Land Division (Subdivision, Parcel Map, Tract Map, etc.) Other _____

IMG-2
ORC-2

Development Type
 Residential: Units _____ Acres _____ Employees _____
 Office: Sq. ft. _____ Acres _____ Employees _____
 Commercial: Sq. ft. _____ Acres _____ Employees _____
 Industrial: Sq. ft. _____ Acres _____ Employees _____
 Educational _____
 Recreational _____
 Water Facilities: Type _____ MGD
 Transportation: Type _____
 Mining: Mineral _____
 Power: Type _____ Watts
 Waste Treatment: Type _____
 Hazardous Waste: Type _____
 Other: _____

Project Issues Discussed in Document

Aesthetic/Visual Flood Plain/Flooding Schools/Universities Water Quality
 Agricultural Land Forest Land/Fire Hazard Septic Systems Water Supply/Groundwater
 Air Quality Geologic/Seismic Sewer Capacity Wetland/Riparian
 Archeological/Historical Minerals Soil Erosion/Compaction/Grading Wildlife
 Coastal Zone Noise Solid Waste Growth Inducing
 Drainage/Absorption Population/Housing Balance Toxic/Hazardous Landuse
 Economic/Job Public Services/Facilities Traffic/Circulation Cumulative Effects
 Fiscal Recreation/Parks Vegetation Other _____

Present Land Use/Zoning/General Plan Use

Project Description

HEARINGHOUSE CONTACT: MIKE CHIARIATTI
(916) 445-0613

DATE REVIEW BEGAN: 7-5-94
 DATE REV TO AGENCY: 8-12
 DATE REV TO SCH: 8-17
 DATE COMPLIANCE: 8-19

<input checked="" type="checkbox"/> Resources <input checked="" type="checkbox"/> Conservation <input checked="" type="checkbox"/> Fish & Game <input checked="" type="checkbox"/> Parks & Rec/OHP <input checked="" type="checkbox"/> DNR	<input checked="" type="checkbox"/> State/Consumer Svcs <input checked="" type="checkbox"/> General Services <input checked="" type="checkbox"/> Colorado Rvr Bd <input checked="" type="checkbox"/> Ok Wash Rpt Bd <input checked="" type="checkbox"/> SWRCB:--Mtr Quality <input checked="" type="checkbox"/> Reg. MOCB # 5 FRE <input checked="" type="checkbox"/> DTIC/CTC
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PLEASE NOTE SCH NUMBER ON ALL COMMENTS
 PLEASE FORWARD LATE COMMENTS DIRECTLY
 TO THE LEAD AGENCY ONLY

DATE/APCD: 15 (Resources: 7,9)

- sent by lead / ** - sent by SCH

Received by
 DEPARTMENT OF CONSERVATION
 JUL 05 1994
 Governmental and Legislative
 Policy Office

D-1 Chawanakee Joint School District (9/7/94)

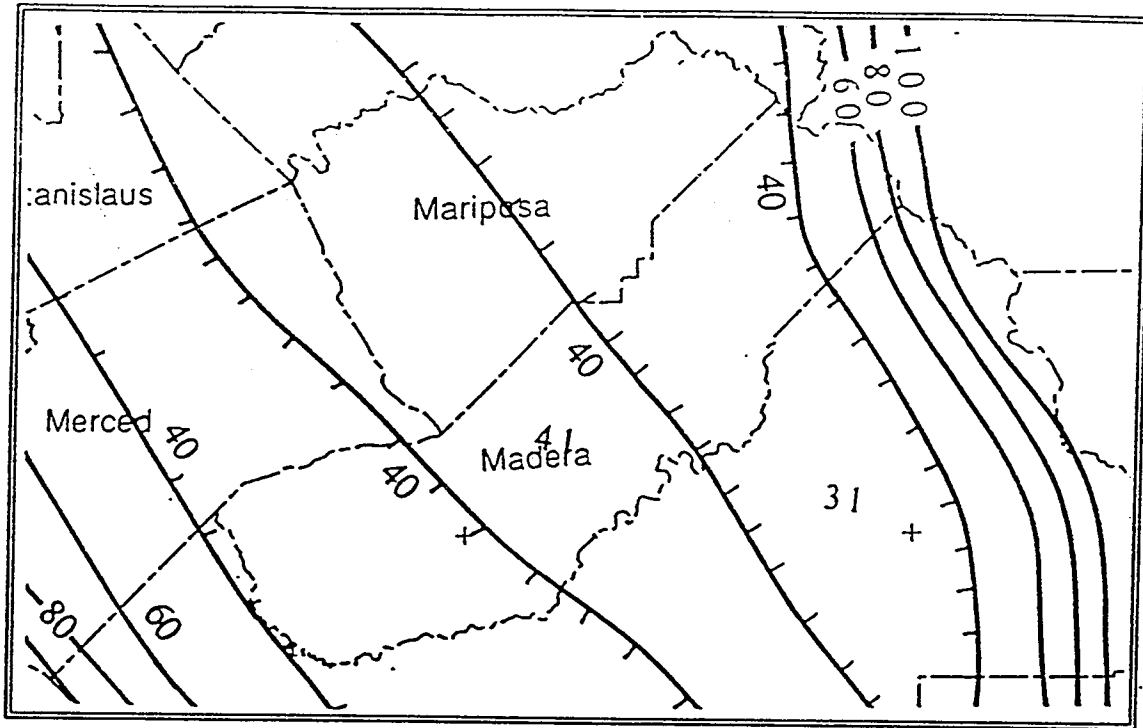
- D-1-1 Requests a change in the language of Policy 3.I.6 to replace the word *should* to *shall* as follows "The County shall work closely with school districts and, where legally feasible, the County *should* provide a mechanism which, along with state and local sources, requires development projects to satisfy an individual school district's financing program based upon evidence of their impactation." This language regarding schools would be consistent with language addressing other public facilities and services and is necessary to address the impacts on school facilities.

The schools policies were discussed during the public review process for the General Plan based on the comments by school districts in the county, and a revised set of policies is included in the adopted General Plan. Policy 3.I.8 requires full mitigation of school impacts by new development if all other means of funding have been exhausted.

Seismic Zonation Map for the County of Madera

FEMA Map 10:

Maximum 0.3 second spectral response acceleration (in percent gravity), with a 90 percent probability of non-exceedance in 250 years.



Scale 1:1,500,000

1 inch \approx 23.7 miles

1 cm = 15 km

Extract from: Building Seismic Safety Council, 1991, NEHRP recommended provisions for the development of seismic regulations for new buildings: Federal Emergency Management Agency, FEMA Report 222.

MAP 10

Preliminary map of the maximum 0.3 second spectral response acceleration^{1,2}, $S_A(0.3)$, with a 90 percent probability of nonexceedance in 250 years. The map values include estimates of variability in the attenuation of spectral acceleration and in fault rupture length.

These maps are presented to introduce new and relevant data for estimating spectral response acceleration. They should not be used for design at this time but should be evaluated by trial design. Review and comments on these maps are invited. Direct comments to the BSSC, 1201 L St., N.W., Suite 400, Washington, D.C. 20005.

The estimation of low values of probability of ground motion (250-year exposure time) may give unrealistic values of spectral acceleration because of uncertainty in attenuation of spectral values and in fault rupture length. The uncertainty is increased in the central and eastern United States because of the difficulty of defining earthquake source zones and the infrequency of earthquake occurrence. Thus, any values on this map should be considered advisory and treated with caution.

Prepared by the U.S. Geological Survey for the 1991 Edition of the *NEHRP Recommended Provisions for the Development of Seismic Regulations for new Buildings*.

¹ Expressed in percent of the acceleration of gravity. Values of spectral response acceleration from the map are divided by 100 for use in the terms in the Appendix to Chapter 1.

² Effective peak acceleration (A_e) may be determined approximately by dividing map values of spectral response acceleration (in percent of the acceleration of gravity) by 2.5.

D-2-6 Student yield factor and single-family/multi-family housing ratio cited on page 5-45 is no longer accurate.

Corrections were made to incorporate the District's Development Fee Justification Study.

D-2-7 Supports policies requiring and encouraging joint County-School District development of facilities.

Comment supports General Plan policy language.

- Bateman, P.C., and Busacca, A.J., 1982, Geologic map of the Millerton Lake Quadrangle, west-central Sierra Nevada, California: U.S. Geological Survey Geologic Quadrangle GQ-1548, scale 1:62,500.
- Bateman, Paul C., Busacca, A.J., Marchand, D.E., and Sawka, W.N., 1982, Geologic map of the Raymond Quadrangle, Madera and Mariposa counties, California: U.S. Geological Survey, Geologic Quadrangle Map GQ-1555, scale 1:62,500
- Fea, Thomas, and Jorgensen, K.E., 1989, Lineament investigation in the western Sierra Nevada foothills belt, Madera, Mariposa, and Merced counties, California: *California Geology*, v. 42, no. 12, p. 283-287.
- Girty, G.H., 1985, Shallow marine deposits in Boyden Cave roof pendant: *California Geology*, v. 38, no. 3, p. 51-55.
- Hambrey, M.J., 1981, Pliocene tills in the Sierra Nevada of California, in Hambrey, M. J., and Harland, W. B., editors, *Earth's pre-Pleistocene glacial record*: Cambridge University Press, 703 p.
- Huber, N.K., 1968, Geologic map of the Shuteye Peak Quadrangle, Sierra Nevada, California: U.S. Geological Survey Geologic Quadrangle Map GQ-728.
- Huber, N.K., and Rinehart, C.D., 1965, The Devils Postpile National Monument: California Division of Mines and Geology, *Mineral Information Service* (now titled *California Geology*), v. 18, no. 6, p. 109-118.
- Huber, N.K., 1987, The geologic story of Yosemite National Park: U.S. Geological Survey Bulletin 1595, 64 p.
- Huber, N.K., Bateman, P.C., and Wahrhaftig, Clyde, 1989, Geologic map of Yosemite National Park and vicinity, California: U.S. Geological Survey, Miscellaneous Investigations Map I-1874, map scale 1:125,000.
- Keskinen, Mary, 1981, Petrochemical investigation of the Shadow Lake piemontite zone, eastern Sierra Nevada, California: *American Journal of Science*, v. 281, no. 7, p. 896-921.
- Krauskopf, K.B., 1985, Geologic map of the Mariposa Quadrangle, Mariposa and Madera counties, California: U.S. Geological Survey Geologic Quadrangle Map GQ-1586, scale 1:62,500.
- Linck, Wendy J., Carlson, Diane H., and Brady, Roland, 1991, Preliminary structural analysis of the Rabbit Hill roof pendant, Madera County, California: Geological Society of America, Cordilleran Section, 87th annual meeting, Abstracts with Programs, v. 23, no. 2, p. 73.
- Lockwood, J.P., and Bateman, P.C., 1976, Geologic map of the Shaver Lake Quadrangle, central Sierra Nevada, California: U.S. Geological Survey Geologic Quadrangle Map GQ-1271, scale 1:62,500.
- Lockwood, J.P., and Moore, J.G., 1979, Regional deformation of the Sierra Nevada, California, on conjugate microfault sets: *Journal of Geophysical Research*, v. 84, no. B-11, p. 6041-6049, 26 references.
- Maher, J.C., Trollman, W.M., and Denman, J.M., 1973, Geological literature on the San Joaquin Valley of California: Northern California Geological Society and American Association of Petroleum Geologists, Pacific Section, 582 pages.
- Matthews, Robert A., and Burnett, John L., compilers, 1966, Fresno Sheet of the Geologic Map of California: California Division of Mines and Geology; Olaf P. Jenkins edition, map scale 1:250,000.
- Nokleberg, W.J., 1981, Geologic setting, petrology, and geochemistry of zoned tungsten-bearing skarns at the Strawberry Mine, central Sierra Nevada, California: *Economic Geology*, Bulletin of the Society of Economic Geologists, v. 76, no. 1, p. 111-133.
- Palmer, C., 1978, Stratigraphy, petrology, and depositional environments of the Ione Formation in Madera County, California: California State University, Fresno, master's thesis, 109 p.
- Paterson, Scott R., Tobisch, O.T., and Vernon, R.H., 1991, Emplacement and deformation of granitoids during volcanic arc construction in the Foothills Terrane, central Sierra Nevada, California: *Tectonophysics*, v. 191, no. 1 & 2, p. 89-110.
- Peck, Dallas L., 1980, Geologic map of the Merced Peak Quadrangle, central Sierra Nevada, California: U.S. Geological Survey, Geologic Quadrangle Map GQ-1531, scale 1:62,500.
- Poland, J.F., Lofgren, B.E., Ireland, R.L., and Pugh, R.G., 1975, Land subsidence in the San Joaquin Valley, California as of 1972: U.S. Geological Survey Professional Paper 437-H, 77 p.
- Ross, D.C., and McCulloch, D.S., 1979, Cross section of the southern Coast Ranges and San Joaquin Valley from offshore Point Sur to Madera, California: Geological Society of America, Map and Chart Series, MC-28H, scale 1:250,000.
- Russell, L.R., and Cebull, S.E., 1977, Structural-metamorphic chronology in a roof pendant near Oakhurst, California; implications for the tectonics of the western Sierra Nevada: *Geological Society of America Bulletin*, v. 88, no. 10, p. 1530-1534, 26 references.
- VanKooten, G.K., 1980, Mineralogy, petrology, and geochemistry of an ultrapotassic basaltic suite, central Sierra Nevada, California: *Journal of Petrology*, v. 21, no. 4, p. 651-684, 90 references.
- Woods, Mary C., 1977, Ice age geomorphology, Middle Fork of the San Joaquin River, Madera County, California: *California Geology*, v. 30, no. 11, p. 249-253.

Mineral Resources of Madera County

- Cox, M.W., and Wyant, D.G., 1948, The Jesse Belle Copper Mine, Madera County, California: California Division of Mines Bulletin 144, p. 151-157.
- Dellinger, D.A., and Johnson, F.L., 1984, John Muir Wilderness, California, in Marsh, S.P., Kropshot, S.J., and Dickinson, R.G., editors, *Wilderness mineral potential; assessment of mineral-resource potential in U.S. Forest Service lands studied 1964-1984*: U.S. Geological Survey Professional Paper 1300, p. 267-269.
- Erwin, Homer D., 1934, Geology and mineral resources of northeastern Madera County, California: *California Journal of Mines and Geology*, v. 30, no. 1, p. 7-78.
- Huber, N.K., and Thurber, H.K., 1984, Minarets Wilderness and adjacent areas, California, in Marsh, S.P., Kropshot, S.J., and Dickinson, R.G., editors, *Wilderness mineral potential; assessment of mineral-resource potential in U.S. Forest Service lands studied 1964-1984*: U.S. Geological Survey Professional Paper 1300, p. 291-292.
- Huber, N.K., and Capstick, D.O., 1984, Mount Raymond Roadless Area, California, in Marsh, S.P., Kropshot, S.J., and Dickinson, R.G., editors, *Wilderness mineral potential; assessment of mineral-resource potential in U.S. Forest Service lands studied 1964-1984*: U.S. Geological Survey Professional Paper 1300, p. 307-308.
- Krauskopf, K.B., 1953, Tungsten deposits of Madera, Fresno, and Tulare Counties, California: California Division of Mines and Geology, Special Report 35, 83 pages, 4 geologic maps.
- Little, J.M., 1942, Geology of the Welsh tungsten deposits, Madera County, California: *California Journal of Mines and Geology*, v. 38, nos. 3 & 4, July-Oct. 1942, p. 291-294.
- Little, J.M., 1942, Ghost Canyon tungsten claims, Madera County, California: *California Journal of Mines and Geology*, v. 38, nos. 3 & 4, July-Oct. 1942, p. 295-302.

E. OTHER SPECIAL DISTRICTS

Selected Geologic Bibliography for the General Plan of the County of Madera

Prepared in August 1994 by the California Department of Conservation
Division of Mines and Geology

The selected geologic bibliography is divided into five sections:

- (1) Earthquakes and Seismic Safety.
- (2) Quaternary Geology - Flatland deposits within the San Joaquin Valley.
- (3) Bedrock Geology - Sierra Nevada Province.
- (4) Mineral Resources.
- (5) Hydrogeology.

Earthquakes and Seismic Safety

- CDMG, 1986, Guidelines for preparing engineering geologic reports: California Division of Mines and Geology, CDMG Note 44, two-page checklist. (A useful basic checklist prepared by the State Geologist for general use and applicable to Madera County.)
- CDMG, 1982, Guidelines for geologic/seismic considerations in environmental impact reports: California Division of Mines and Geology, CDMG Note 46, two-page checklist. (Prepared by the State Geologist for authors of EIRs.)
- FEMA, 1991, NEHRP recommended provisions for the development of seismic regulations for new buildings: Federal Emergency Management Agency, Reports 222 and 223, two volumes prepared for FEMA by the Building Seismic Safety Council, 119 p. and 237 p. (Map sheets 6, 8, 10, and 12 apply to Madera. Prepared by seismologists of the U.S. Geological Survey as a nation-wide effort in seismic microzonation utilizing latest methods in probabilistic seismic hazard mapping.)
- Hart, E.W., 1994, Fault-rupture hazard zones in California: California Division of Mines and Geology, Special Publication 42, 1992 revised edition, 34 p. (This is the official publication to cite when an author of an Environmental Impact Report wants to state reliably that there are no active faults and no Alquist-Priolo Earthquake Fault Zones in Madera County.)
- Hill, D.P., Eaton, J.P., Ellsworth, W.L., Cockerham, R.S., Lester, F.W., and Corbett, E.J., 1991, The seismotectonic fabric of central California, in Stemons, D.B., Engdahl, E.R., Zoback, M.D., and Blackwell, D.D., editors, Neotectonics of North America: Geological Society of America, Decade Map Volume 1, p. 107-132.
- ICBO, 1994, Uniform Building Code: Whittier, California, International Conference of Building Officials, 3 volumes. (Chapters 16, 18 and A-33 apply in regards to seismic design, foundations, and grading.)
- Idriss, I.M., 1990, Response of soft soil sites during earthquakes, in Duncan, J.M., editor, Proceedings of the H. Bolton Seed Memorial Symposium: BiTech Publishers Ltd., v. 2, p. 273-289.
- Jennings, C.W., 1994, Fault activity map of California and adjacent areas: California Division of Mines and Geology, Geologic Data Map 6, scale 1:750,000. (Will be published in autumn 1994; faults are color-coded by recency of movement.)
- Joyner, W.B., and Boore, D.M., 1988, Measurement, characterization, and prediction of strong ground motion, in VonThun, J.L., editor, Earthquake engineering and soil dynamics II: American Society of Civil Engineers, Geotechnical Special Publication 20, p. 43-102. (This reference is typically used by engineers, seismologists, and geologists for evaluation of strong motion.)
- Petersen, Mark D., and Wesnousky, S.D., 1994, Fault slip rates and earthquake histories for active faults in southern California: Seismological Society of America Bulletin, v. 84, no. 5, October 1994.
- Reiter, Leon, 1990, Earthquake hazard analysis: Columbia University Press, 254 p. (A comprehensive text which explains probabilistic seismic hazard analysis and applications of strong-motion seismology.)
- Rymer, Michael J., and Ellsworth, William L., editors, 1990, The Coalinga, California, Earthquake of May 2, 1983: U.S. Geological Survey Professional Paper 1487, 417 pages, 23 chapters by 62 geologists and seismologists. (The definitive publication about the 1983 Coalinga earthquake, which is the prototype of a blind-thrust earthquake along the western margin of the San Joaquin Valley. These kinds of blind-thrust faults are of particular concern because they are believed to be the source of regional seismic shaking which would affect Madera County.)
- Stein, R.S., and Ekstrom, G., 1992, Seismicity and geometry of a 110-km-long blind thrust fault; part 2, Synthesis of the 1982-1985 California earthquake sequence: Journal of Geophysical Research, v. 97, part B, no. 4, p. 4865-4883.
- Stein, Ross S., and Yeats, Robert S., 1989, Hidden earthquakes: Scientific American, v. 260, no. 6, p. 48-57. (Explains the concepts of blind-thrust faults and Coalinga-type earthquakes which might affect western Madera County.)
- Stover, C.W., and Coffman, J.L., 1993, Seismicity of the United States, 1568-1989 (revised): U.S. Geological Survey Professional Paper 1527, 418 p. (An up-to-date catalog listing all significant American earthquakes.)
- Topozada, T.R., Real, C.R., and Parke, D.L., 1981, Preparation of isoseismal maps and summaries of reported effects for pre-1900 California earthquakes: California Division of Mines and Geology, Open-File Report 81-11, 182 p. (Contains maps of the felt areas of older historic earthquakes.)
- Topozada, T.R., and Parke, D.L., 1982, Areas damaged by California earthquakes, 1900-1949: California Division of Mines and Geology, Open-File Report 82-11, 65 p.

E-1 Madera County Mosquito and Vector Control District (9/9/94)

E-1-1 Conversion of agricultural and grazing land to urban uses will result in urban development adjacent to agricultural operations which produce mosquitoes capable of transmitting diseases.

Comment noted. The General Plan includes policies to encourage orderly conversion of farmland to minimize premature conversion. In an agricultural county, it is often impossible for growth to occur in cities and unincorporated communities without converting agricultural operations and creating an urban/agricultural edge.

E-1-2 The District's effectiveness in controlling mosquitoes is limited by state and federal laws limiting some controls and higher resistance levels in target species.

Comment noted.

E-1-3 The District's limitations are heightened with efforts to recreate a natural or predevelopment habitat, as in Rio Mesa and Gunner Ranch West new growth areas.

It is not clear to which efforts the commentor is referring to in connection with development in the Rio Mesa and Gunner Ranch West Areas. Specific development plans are addressed separately in plans and EIRs for these areas. Development in new growth areas will, however, result in exposure of people to mosquitoes.

E-1-4 The District will continue to provide for vector control, but cannot guarantee a mosquito-free environment. Newly developed areas should be informed in advance of seasonal mosquito infestations.

Comment noted.

Memorandum

To: Project Coordinator
Resources Agency

Date: August 19, 1994

Mr. Leonard Garoupa
Planning Department
County of Madera
135 West Yosemite Avenue
Madera, CA 93637

From: Department of Conservation
Office of Governmental and Environmental Relations

Subject: Geology and Seismology Review of the Safety Element within the June 1994 draft
General Plan for the County of Madera – SCH# 93102017

The California Department of Conservation, Division of Mines and Geology, has reviewed the June 1994 draft of the General Plan for the County of Madera. The draft consists of three volumes prepared by the Sacramento planning firm Mintier and Associates. Our review focused on the second volume entitled "Background Report," Chapter 7, Safety Element, and specifically Section 7.2, "Seismic and Geologic Hazards" on pages 7-1 through 7-8.

The draft General Plan has been well researched. We are in general concurrence with most of the material presented in the draft. Based on our review of the draft General Plan, we offer the following comments for the Safety Element:

1. We recommend that Table 7-2 be deleted because it serves no purpose in the Safety Element and the concept is no longer generally valid. There are no known active faults in Madera County, so we cannot postulate an earthquake within county boundaries and thereby "correlate" magnitude scale and intensity scale. This table was published in 1977, and its intended use was (then) for Bay Area counties and certain soft sediments that occur within the Bay Area. Beginning with Coalinga earthquake in 1983, our knowledge of magnitude and intensity relationships has significantly changed. Neither the USGS or DMG currently use this kind of correlation table. For strong ground motion, we prefer to focus on quantitative aspects, rather than descriptive aspects.
2. We have included two page-sized illustrations for seismic zonation of Madera County, extracted from a 1991 FEMA report. The maps utilize probabilistic seismic hazard mapping techniques and consider the effects of earthquakes west of the county (along the San Andreas fault), and earthquakes east of the county (in the Mammoth - Long Valley Caldera area). The maps indicate that populated areas (San Joaquin Valley portion) of Madera County could be subject to seismic shaking of:
 - a maximum 0.3 second spectral response acceleration of $\approx 0.4g$, with a 90 percent probability of non-exceedance in 250 years.
 - a maximum 1.0 second spectral response acceleration of $\approx 0.15g$ to $20g$, with a 90 percent probability of non-exceedance in 250 years.

B-2-1

B-2-2

E-3 Fresno Metropolitan Flood Control District (9/16/94)

- E-3-1 Recommends policies requiring preservation of natural drainage/watercourses through easement dedication at the time of dedication.

Policies 3.E.5 and 3.E.8 address this issue, by encouraging project designs that maintain natural site drainage conditions and encourage the use of natural drainage systems.

- E-3-2 The District recommends a higher degree of flood protection around the San Joaquin River (i.e. 40-year flood event).

The County chose a 100-year flood event as the appropriate minimum level of flood protection.

- E-3-3 The EIR does not adequately address the impact on the San Joaquin River from future urban runoff, and should include mitigation measures to ensure that appropriate construction and post-construction controls will be required for development projects to reduce stormwater pollutants.

This issue is addressed in policies and programs of the General Plan. Policy 3.E.6 states that "future drainage system discharges shall comply with applicable state and federal pollutant discharge requirements" and Program 3.6 requires the County to prepare and adopt ordinances and programs as necessary and appropriate to implement required actions under state and federal stormwater quality programs.

- E-3-4 General Plan documents tend to discount the risk to persons or development with dam failure inundation areas, and should consider the potential risks as required by law.

In designating land uses and developing policies, the County did indeed take into consideration the risks associated with potential dam failure inundation, and complied with all statutory requirements for this issue. Most of the population growth within dam failure inundation areas is projected to occur around the cities of Chowchilla and Madera under each cities' jurisdiction. The most appropriate response for the County to address this issue is to provide for adequate emergency response and evacuation plans.

incorporated into the general plan update document.

(Policy Document, Policy 2.C.1, 2.C.2, 2.C.3, 2.17, Page 27-28) More definitive measures, than promotion and encouragement, should be adopted to maximize the efficient use of transportation facilities.

(Policy Document, Policy 2.D.3, Page 28) Local and regional facilities need to be coordinated.

The general plan should establish a correlation between the land use and transportation elements. Land use design concepts that encourage the use of alternative modes of travel (transit, bicycles, pedestrian, etc.) and discourages single-occupancy-vehicle ridership should be an inherent part of the plan. Some of the design concept elements are the following;

Village land use design concepts include mixed land uses and densities, diversity of housing types and major activity centers which provide common everyday activities/services within easy walking distance to each other, especially on-site child care for large employers.

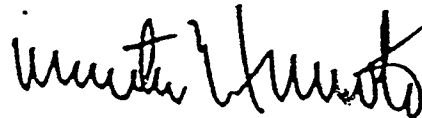
Design criteria that encourages transit use are office buildings close to the street, parking behind buildings, minimizing distance between housing and transit routes, minimizing block lengths, use of sidewalks, bus stops and shelters.

A grid street system is necessary to encourage internal travel patterns and to help avoid the use of the regional circulation system.

Please call Marta Frausto at (209) 488-4168 should you have any questions.

Sincerely,

MARC S. BIRNBAUM, Chief
Advance Planning & Programming



Marta Frausto
Intergovernmental Review

E-5 San Joaquin River Parkway and Conservation Trust (9/12/94)

- E-5-1 Supports inclusion of the general goals and objectives of the Parkway in the Draft General Plan, and notes that the San Joaquin River Conservancy has been created to acquire and manage public lands within the San Joaquin River Parkway.

The letter generally supports the inclusion of the goals and objectives concerning the San Joaquin River Parkway. The Background Report was revised to discuss the formation and responsibilities of the San Joaquin River Conservancy.

1352 West Olive Avenue
Post Office Box 12616
Fresno, California 93778



(209) 488-4088

TDD (209) 488-4066

FAX (209) 488-4221

March 21, 1994

2134-IGR/CEQA
6-MAD-GENERAL
SCH # 93102017
MADERA COUNTY
GENERAL PLAN UPDATE

Leonard Garoupa
Madera County
Planning Department
135 West Yosemite Avenue
Madera, CA 93637

Attention: Leonard Garoupa

Thank you for the opportunity to review the Madera County Advisory Committee Review Draft General Plan Update Background Report and Policy Document. Caltrans has the following comments:

(Background Report, Figure 3-2) In the event Avenue 9 is ever to be considered as an alternative to State Route (SR) 145, it will require a minimum right-of-way of 170 feet for a four lane expressway (existing SR 145 is on the Freeway/Expressway System). If SR 145 were taken off the Freeway/Expressway System a minimum of 110 feet should be protected for a four lane divided highway.

(Policy Document, Note, Page 11) We look forward to reviewing the general plan's traffic analysis for a verifiable balance between the planned land use and circulation system.

(Policy Document, 1.3, Page 14) We support policy which requires new development (specifically Gunner West/Valley Children's Hospital Area, Rio Mesa Area, and State Center Community College Area) to provide for adequate infrastructure and address the environmental impacts of their developments.

(Policy Document, 2.A.2, Page 21) A monitoring program is needed to identify the location of signalization projects, timing/level of development that triggers necessary improvements.

F. COMMUNITY ORGANIZATIONS

DEPARTMENT OF TRANSPORTATION

1352 West Olive Avenue
Post Office Box 12616
Fresno, California 93778



8/19
(E)

(209) 488-4088
DD (209) 488-4066
AX (209) 488-4101

August 12, 1994

2134-IGR/CEQA
6-MAD-GENERAL
SCH # 93102017
MADERA COUNTY
GENERAL PLAN UPDATE

AUG 15 1994

Mr. Leonard Garoupa
Madera County
Planning Department
135 West Yosemite Avenue
Madera, CA 93637

Dear Mr. Garoupa :

We have had the opportunity to review the Madera County General Plan Update (June 1994). We reviewed each submitted document, but have used the Draft EIR as the primary source upon which to base our assessments and concerns. Caltrans comments are as follows :

Page 4-5, Madera County Traffic Model : It is crucial to note that a Full Buildout model is the only way to accurately link land use to transportation (2010 does not represent cumulative impacts and is therefore inappropriate for this planning application). All existing and possible river crossings need to be included in the model as well. We are reiterating the Caltrans/CEQA requirement for a Full Buildout model and the necessity for including it in the General Plan.

B-1-1

Page 4-5, Level-of-Service Policies : As stated in the General Plan Update, this policy severely limits the flexibility of the County to exact LOS standards above D. We believe that an acceptable policy goal should be C, when fiscally feasible. When a particular area does not lend itself to LOS C (either traffic characteristics or financial constraints), D would then be acceptable.

B-1-2

Page 4-10 & 4-11, SR 99 between Ave. 17 and the San Joaquin River : The last sentence of this section states that 'it is anticipated that an amendment to the General Plan will be proposed incorporating the study results and recommendations'. This does not adequately address court determinations which state that future studies are not to be considered in lieu of mitigations.

B-1-3

F-1 Oakhurst Residents Association (9/9/94)

F-1-1 Questions how the EIR conclusions that cumulative impacts of development include the general intensification of land uses in the region and a transition from an agricultural landscape to an increasingly urban setting is reconciled with the goals of the Oakhurst Ahwahnee Area Plan to preserve the area's rural nature and low residential density.

The statement in the EIR addresses the overall increase in development and population in the county over the next 20 years; the most dramatic changes would be expected in the new growth areas and around the city of Madera. Growth in the foothills and mountain regions, while expected to be fairly significant, would continue at low densities as designated by the General Plan and Oakhurst-Ahwahnee Area Plan. It is true, however, that substantial grazing land would be converted in the foothills and mountain areas with projected growth under the General Plan, but it is expected that this would be converted to rural residential development and not higher density urban style development.

F-1-2 Questions how the terms "community" and "local government" are meant in section entitled "Purposes of the General Plan" in the Introduction of the Draft Policy Document where it states "To define the community's environmental, social, and economic goals and to record the local government's policies and standards for the maintenance and improvement of existing development and the location and characteristics of future development."

In this context (i.e., introducing the countywide general plan), these terms are meant to indicate the Madera County government and the large countywide community. Local community (e.g., Oakhurst) and city goals are intended to be addressed in the framework of area and/or community plans.

F-1-3 Questions whether the policies of the Draft Policy Document will be included in any area or specific plan for Oakhurst and in what way an Oakhurst Specific Plan could alter the land use decisions and policies of the General Plan.

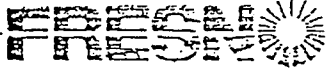
The policies of the General Plan, when adopted, will apply countywide (except within city limits), including within any areas that have adopted area or specific plans. If a subsequent plan is not consistent with the policies of the General Plan, amendments to the countywide General Plan would be required to prior to approval of any area plan or specific plan to ensure consistency with the General Plan. Local governments may amend the General Plan up to four times a year; each amendment may include multiple changes.

F-1-4 Questions whether the 1980 Oakhurst-Ahwahnee Growth Management Plan will be amended to conform to the new General Plan and whether any new Oakhurst Specific Plan would also need to conform to the General Plan.

The General Plan is a legal document that is essentially the county's "constitution" for land use and development. By virtue of state law and case law, all land use plans, zoning, subdivision approvals, and public works projects must be consistent with the General Plan. The Oakhurst-Ahwahnee Plan was amended with adoption of the General Plan, the amendments are included in Appendix A of the EIR beginning on page A-9 with explanations of why the amendments are needed. Any new plan for the Oakhurst area will be required to be consistent with the General Plan.

A-7

County of



Public Works & Development Services Department

Richard D. Welton
Director

September 12, 1994

Mr. Leonard Garoupa
Planning Director
Madera County Planning Department
135 West Yosemite Avenue
Madera, CA 93637

Dear Mr. Garoupa:

SUBJECT: Madera County Draft General Plan Update and Environmental Impact Report

The above referenced Draft General Plan Update and Draft Environmental Impact Report (DEIR) was circulated for review within the Fresno County Public Works & Development Services Department. The Department Staff offer the following comments:

1. Page 3-10, 6th full paragraph

The additional river crossing envisioned in the Clovis "beltway" proposal was not evaluated because "traffic modelling did not indicate that this roadway would assist in addressing traffic from existing and proposed development in Madera County." This contradicts figure 4-5, which shows a 2010 Level of Service of "E" for segments of Avenue 12 east of Road 36, and State Route 41 between State Route 145 and Avenue 12. State Route 99 is shown with a Level of Service of "F" for the same period. All of these routes could potentially benefit from one or more new river crossings. In addition, elsewhere in DEIR it is pointed out that the trend of commuters living in Madera County but working in Fresno County is likely to continue.

A-4-1

(Note: the compass directions describing the proposed Clovis beltway route segments are reversed: "east" should be changed to west; "north" should be changed to south. Similar errors occur in the Draft General Plan Background Report on pages 1-26 and 1-30.)

A-4-2

Although specific traffic impacts of the proposed Gunner Ranch and Rio Mesa projects are being dealt with in the EIRs prepared for those projects, an overview of those impacts should be included in this EIR to reflect their New Growth Area designations on the proposed General Plan update. Traffic generated by those projects alone would appear to warrant a discussion of the potential need for additional river crossings.

A-4-3

F-1-10 Questions how the Draft General Plan can determine how much development is possible if the amount and availability of water cannot be ascertained or guaranteed.

The General Plan cannot determine how much development is possible given uncertainties about water supply and quality. The projections used in the EIR assume no significant constraints on growth. The requirement that new development be conditioned on an adequate water supply applies to individual development projects. If water supply is not demonstrated by a specific proposed development project, the County will not allow its development. The EIR acknowledges that the County may not realize its projected growth because of insufficient water supplies.

F-1-11 The EIR indicates that water demand at buildout will be five times greater than in 1990. Questions how the General Plan resolves this inconsistency given uncertainty about water supply.

The EIR analyzes the potential impacts based on the land use designations of the plan. These designations are based largely on land uses that have been designated historically. Designation of land uses, however, does not guarantee their development. The policies of the plan will govern approval of development, including requirements that adequate public facilities and services can be provided. Information is provided in the EIR to assist the public, Planning Commission, and Board of Supervisors in making decisions regarding long-term growth as proposed in the General Plan.

F-1-12 Questions how the Draft General Plan can provide for levels of development when the cumulative impacts from on-site wastewater systems is unknown and identified as potentially significant. Questions how it was determined that additional mitigation could reduce the impact to a less-than-significant level if the additional mitigation identified, connecting to community wastewater systems in problem areas, is identified as probably not widely feasible.

Densities in the foothills and mountain areas are generally designated at low densities to allow for safe use of on-site wastewater disposal. Given the level of growth projected over the next 15 years, however, there is no information available to determine the cumulative effect this may have on water quality in these areas. Without a reasonable guarantee that water quality would not be affected, the EIR identified it as a potentially significant impact. While it is true that connecting development at the low densities designated in the foothills areas to community wastewater systems would be very costly, the extent and area of any future problems are unknown. If feasible, this would reduce the impacts on water quality. Technological advances over the next 15 years may also help in addressing this issue.

F-1-13 Questions why EIR recommends additional monitoring of area on SR 41 and Road 426 in the vicinity of Oakhurst when Service Level E is projected.

The EIR recommends continued monitoring and further study because the trip generation in this area as predicted by the Madera County traffic model was untypical of other areas of the county. Travel patterns are different because of the number of retirees and vacation homes, which tend to have lower trip generation rates. Given the long-term focus of the General Plan, the future trip generation may differ greatly. To start planning for improvements at this time given such uncertainty might lead to under or overimprovements to roadways in the area. Continued monitoring would allow the County to address the needed improvements when trip generation rates had stabilized with greater certainty.



CITY OF CLOVIS

CITY HALL • 1033 FIFTH STREET • CLOVIS, CA 93612

September 9, 1994

Mr. Leonard Garoupa, Planning Director
Planning Department, County of Madera
135 W. Yosemite Avenue
Madera, CA 93637

Dear Mr. Garoupa:

Subject: Draft EIR for the Madera County General Plan

Thank you for the opportunity to review and comment on the Draft Environmental Impact Report for the Madera County General Plan project. The City of Clovis has the following comments.

The 1993 Clovis General Plan, adopted in April 1993, envisioned the addition of two expressways, inner and outer beltways, which address important regional transportation needs of the Clovis and Fresno metropolitan areas. The outer beltway, which runs generally along Copper and Academy Avenues, and inner beltway, which follows generally the Shepherd-McCall Avenue alignments, are projected to play an important role in local and regional travel in the future. Both corridors represent long-range commitments to the development of adequate regional and inner-community regional facilities.

An important function of the outer beltway alignment is to provide the northeast metropolitan area, i.e., Clovis and points northeast, with a major unobstructed transportation corridor to Madera County and Highway 99. The outer beltway runs to the proposed sphere of influence boundary at Willow Avenue in the north. This provides an opportunity for continuing this east-west expressway concept west of Willow Avenue to Friant Road and ultimately intersecting with Highway 41. Consequently, this expressway will ultimately intersect at the Avenue 9/10 interchange in Madera County and is thus part of the project currently under review in the DEIR document. Although the Draft Background Report discusses the Clovis beltways, the DEIR's discussion of traffic and circulation impacts does not appear to include an analysis of the Copper Avenue beltway/Avenue 9/10 expressway/freeway concept. In conclusion, the DEIR for this project should have considered this regional transportation concept and provided an analysis of the planned contribution and potential impact of this significant transportation corridor.

A-3-1

Thank you for the opportunity to comment on this project. Should you have any questions, please contact me at 297-2347.

Very truly yours,

Mike Waiczis

Mike Waiczis, AICP
Associate Planner

City of Clovis (97) 297-2320 • Community Services Dept. 297-2430 • Finance Dept. 297-2307 • Fire Dept. 297-2460
Personnel Dept. 297-2328 • Planning Dept. 297-2340 • Police Dept. 297-2400 • Public Works Dept. 297-2353 • Fax 297-2587

TOTAL P. 01

COMMENT LETTERS



August 17, 1994

Leonard Garoupa
Planning Director
Madera County Planning Department
135 West Yosemite Avenue
Madera, Ca. 93637

RE: DRAFT GENERAL PLAN AND ENVIRONMENTAL IMPACT REPORT

Dear Leonard:

Our Staff has completed a preliminary review of the Draft General Plan Update for the County, and have the following comments as it relates to the City's General Plan:

1. The land use designations along the west side of Country Club Drive (Road 26) do not appear to coincide with the City's Plan. The entire strip between the City limits and Avenue 17 seems to have a Profession Office pattern, while the City's designations are a mixture of Office, Medium Density Residential, and Neighborhood Commercial. A-2-1
2. In regard to the Agricultural assigned to some of the fringe areas in the northeast, southeast and west portions of the Planning Area, we assume this is intended to be a form of holding designation. This would be similar to the City's "Reserve" designation assigned with the Very Low and Low Density Residential for some these same areas. However, it does not appear that the General Plan text contains any policy statements to that effect. If this is not the intent of the Plan, we would recommend consideration of designations to match the City's Plan. A-2-2
3. The properties on the north side of Avenue 17 at Airport Drive appear to be designated Industrial, whereas the City's Plan indicates Highway Commercial for this area. Two of the parcels in this area have been approved for annexation and prezoned for commercial development. A-2-3

GENERAL PLAN UPDATE ADVISORY COMMITTEE
MADERA COUNTY LIBRARY
BLANCH GALLOWAY ROOM
121 NORTH G STREET
MADERA, CALIFORNIA
August 17, 1994 MEETING

The meeting was called to order at 6:00 p.m. by Chairman John Reed.

ROLL CALL:

Susan Norby	Myra Bertrand
Ron Daggett	Gary Giersch
John Rigby	David Austin
Laurence Curtiss	Thomas Gee
John Reed	Sharen Thomas
Larry Van Amen	Tom Wheeler

BUSINESS

(This meeting was recorded.)

REQUEST FOR COMMENTS FROM THE AUDIENCE

Chairman Reed asked the audience if anyone had any general comments they would like to address to the Advisory Committee prior to conducting the meeting. No one in the audience addressed the Committee.

1. REVIEW OF THE DRAFT GENERAL PLAN

John Reed said that the Draft General Plan has been submitted to the public for review. So the Committee can not make a change in this document. The Committee can make a recommendation to the Planning Commission and the Board of Supervisors. The recommendation can be made in a number of ways; a Committee vote that could be submitted in writing or elect to have a member or members of the Committee appear in front of the Planning Commission and make the recommendation.

John Reed stated that he didn't remember ever adopting the Transportation and Circulation Element because they were waiting for the inclusion of the road names. Tom Wheeler and Sharen Thomas agreed. Leonard said that the minutes showed that it had been adopted. John said that the minutes showed that the background document had been adopted and the policy document had been adopted but everyone remembers it the same way. That one part was held off until information was submitted from the Transportation Department. As a matter of housekeeping it should be adopted. Leonard said that before you do that you should go through some of the General Plan.

The question was asked about community review, comment, and hearings. John Reed said

17. Create a corridor between Raymond and Chowchilla
18. Provide one or more crossing on the San Joaquin River
19. A bypass around Madera Ranchos
20. A bypass around the City of Madera at Highway 145
21. Upgrade Avenue 9 as an expressway
22. Continue Road 274 to the San Joaquin River on Auberry Road
23. Link the Indian Lakes Estates road system to Coarsegold and North Fork
24. Link Avenue 18 or 17 to Highway 145
25. Connect Road 35\36 to Road 400 as a corridor

A-1-15

Sharen Thomas said that she wanted it noted that the Committee was to be notified when the Transportation Element was complete, before the General Plan was finished.

A-1-16

Susan Norby said that on Page 710 and 711 the acreage of farmland stated to be converted from ag land in the next 20 years is unbelievable. Leonard explained that some of the land that will be developed is already designated for residential.

A-1-17

On motion by Susan Norby, seconded by Myra Bertrand, and unanimously approved, it was ordered to write a letter to the consultants suggesting the numbers for conversion of agricultural to other uses of land in the West/Agriculture, Chowchilla/Fairmead, Raymond/Central Area, and the North Fork/Millerton areas be checked for accuracy.

Susan Norby expressed her concern over Section 9.4 of the Environmental Impact Report concerning growth inducement impacts.

A-1-18

A motion was made by Susan Norby that the CEQA sections on Long Term Productivity, Irreversible Effects, and Growth Inducement Impacts be expanded. The motion dies for lack of a second.

On motion by Susan Norby, seconded by Myra Bertrand, and unanimously approved, it was ordered to recommend to the Consultant that the seven Committee members that attended less than nine meetings be eliminated from the General Plan Update Advisory Committee members listed in the General Plan. They are: John Brooks, Michele Roberts, Zalise Edwards, Vincent Mendez, William Kohfre, Thomas Efird, and John Jamison.

A-1-19

Sharen Thomas asked that the spelling of her name be corrected. It is listed as Sharon Thomas and should be Sharen Thomas.

in year 2020. The grand total is 419,768 population at buildout. It's based on the 1990 census. The numbers are very close to the projections by the Department of Finance. Leonard explained the buildout by area.

Tom Wheeler said that the North Fork Indian Museum is not listed in the General Plan.] A-1-9

There was a general discussion of the population at buildout in the year 2010. New growth projection is 100,000.] A-1-10

Susan Norby asked why eliminating Rio Mesa was not considered a reasonable alternative to growth in the Environmental Impact Report. Leonard said that it was considered in the Alternative 2. But that it is a judgement call on how realistic it is to consider no growth in that area. She said that she has a problem. Some of the issues that the Committee agreed upon in terms of policy for the County seem to have been changed. Growth would be infill around population communities centered in Madera County. The Rio Mesa is a contradiction to that. Growth would be centered around communities in Madera County rather than becoming a suburb for Merced or Fresno.] A-1-11

Goal #5, stated that agriculture would remain the primary economic basis of Madera County. This has been watered down and no longer reflects the goals and polices adopted by the Committee.] A-1-12

Leonard said that the new growth areas were already designated and must be considered.

Susan Norby said that the traffic model states that Service Level E or F are an acceptable level. We have better than that now. That's not going to be considered as an impact.] A-1-13

Leonard said that it is not an uncommon Service Level. It's not just based on the amount of traffic on the road. It's based on the alignment, curves, speed, etc. The General Plan recommends that Level C be maintained in all cases where practical.

John Reed said that the Committee can make a motion to make a recommendation and vote on it as a Committee.

Susan Norby said that she felt that the Environmental Impact Report was not up to standards.] A-1-14

John Reed said that Leonard had explained that the problem with the road list is that you can't include something that is a mandated part of the plan unless it is identified how it will be funded.]

Leonard explained that the overall road improvement plan and funding for these improvements is operated through the County Transportation Commission. The Transportation Authority is an appointed group that consist of members of the Board of Supervisors, City Council, and public members from each area. They are the ones who establishes the priority projects for the Transportation System and adopt a plan showing you where the roads are that will be improved with Measure A funds for example. We can only] A-1-15