



City of Reedley

NICOLE R. ZIEBA
OFFICE OF THE CITY MANAGER
1717 Ninth Street
Reedley, Ca. 93664

August 28, 2014

Briza Grace Sholars, Planner
Fresno County
Department of Public Works and Planning
Development Services Division
2220 Tulare Street, Sixth Floor
Fresno, California 93721

RE: Riverbend Sand and Gravel Project (CUP #3390 & EIR #6606)

Dear Ms. Sholars:

The City of Reedley appreciates the opportunity to review and comment on the Draft Environmental Impact Report (EIR), associated with the Riverbend Sand and Gravel Project (CUP#3390 & EIR#6606). The project is located northwest of the City of Reedley and includes approximately 619 acres for mining purposes and approximately 268 acres for a reclamation plan. "Operations would be conducted in nine phases, which would ramp-up over a five year period, and would be expected to be on-going for at least 75 years" (Riverbend Sand and Gravel Project Draft EIR, Page ES-1).

The City of Reedley has reviewed the Riverbend Sand and Gravel Project Draft EIR, and associated technical studies and would offer the following comments:

1. **Agricultural and Land Use:** The loss of prime agricultural land for an extended period of time is a significant impact to this region of the Central Valley. The City appreciates the incorporation of the Land Evaluation and Site Assessment (LESA) model (California Department of Conservation) to evaluate the relative quality of the land resource. This coupled with the incremental procurement of incremental conservation easements as described in Mitigation Measure AG-1, are consistent with CEQA Guidelines §15126.4.

2. **Biological Resources:** The proposed project includes the addition of water storage cells which are in close proximity to the Reedley Municipal Airport and will attract a variety of water fowl and wildlife. The City is concerned that there is not sufficient separation and is requesting that the applicant to work with the City of Reedley, or Federal Aviation Administration to develop a Wildlife Hazard Management Plan (14 CFR 139.337 (f)).

3. Hydrology and Water Quality: The City strongly encourages revisiting the groundwater analysis to correct what appear to be inconsistencies.

The significant overdraft condition of the Kings Basin has been well documented and is worsening with the current drought condition. While efforts are underway throughout the local area to address the Kings Basin overdraft problem, it is unlikely that the existing measures being implemented will be sufficient to fully bring the basin into equilibrium within the project's timeframe.

At both the Mid-mining and End of mining periods there is reduction of groundwater usage attributed to agricultural irrigation. However, the Total Crop and Mining Consumptive Use (Table 3.9.4 Project Site Water Budget, Page 3.9-23) substantially increases, creating a significant deficit in "consumptive use". Generally, "consumptive use" means the amount of groundwater extracted that is not returned to the underground aquifer, or the volume of water extracted that is consumed. Therefore, concluding the project will have a less than significant impact on water seems inconsistent with the acknowledgement of the Kings Basin overdraft condition and consumptive use deficit that is cited in the DEIR and technical study.

That same less than significant impact conclusion for cumulative impacts of hydrology and water quality, with respect to groundwater, may also be inadequate. For this project to simply rely on BMPs or other local, State and Federal regulation, does not address the "Cumulatively considerable" effects, pursuant to CEQA §15065(A)(3) & §15130. It does appear there is simply a reliance on other development projects determination of a less than significant impact, compared to a true analysis of the incremental impacts created by those projects, and how this project either increases or decreases impacts to groundwater. The City recommends that mitigation measure(s) be developed to further reduce the "consumptive use" to a point of equilibrium.

4. Transportation and Circulation: The City continues to have concerns about increased truck traffic generated from the project and cumulatively from other localized existing and future mining operations. It appears the Traffic Impact Study (TIS) prepared by VRPA, only took into account historical trips based upon sales, not the very real future trips that will be generated by projects in the region south and east of the project site, over the life of the project (75 years). The TIS wrongly presumes no trips will be southbound on Reed Avenue.

Reed Avenue is one of the busiest segments of our surface transportation system. Pedestrian traffic from Reedley College and Reedley High School combined with commuter traffic into and out of the City impact the Level of Service. The current a.m. and p.m. existing condition at the Manning/Reed Avenue intersection is a Level of Service D (City of Reedley General Plan Update, Draft Environmental Impact Report, certified February 25, 2014). Therefore, any traffic generated by this project will further significantly impact the movements at this intersection.

Additionally, the increase in truck traffic from this project along with other recently approved mining projects will cumulatively impact a roadway structural section that was not designed to accommodate the additional truck trips which in turn will expedite the degrading of the roadway and lead to additional maintenance costs and ultimately a thicker structural section when the roadway is rehabilitated.

The City of Reedley is requesting that Mitigation Measure Trans -1 be modified to ensure the Project Applicant pays their proportional fair share contributions towards the required improvements, which would establish the exact payment amounts and thresholds.

Lastly, the subject project site falls within the Reedley Municipal Airport Conical and Horizontal Zones. Therefore the City is requesting the applicant comply with applicable Federal Aviation Administration related to construction of vertical improvements (FAA 7460) or objects affecting navigable airspace (14 CFR Part 77).

The City of Reedley appreciates the opportunity to provide its comments on this Draft Environmental Impact Report. If you have any questions or need any information, please contact me at (559) 637-4200, ext. 212, or Kevin Fabino, Community Development Director at 559, 637-4200, ext. 286, or by email at kevin.fabino@reedley.ca.gov.

Sincerely,



Nicole R. Zieba, City Manager