Exhibit H

CARLSBAD
CLOVIS
IRVINE
LOS ANGELES
PALM SPRINGS
POINT RICHMOND
RIVERSIDE
ROSEVILLE
SAN LUIS OBISPO

MEMORANDUM

DATE: February 10, 2025

TO: Rob Holt, Supervising Planner

FROM: Kyle Simpson, Principal

SUBJECT: California Environmental Quality Act (CEQA) Addendum for the Southwest Fresno Specific Plan; Fresno, California

The proposed Elm Avenue Rezone project (proposed project) includes rezoning 11 parcels by the City of Fresno (City). The proposed project is located in the Plan Area of the Southwest Fresno Specific Plan (SWFSP).[1] The SWFSP Environmental Impact Report (EIR),[2] was certified by the City of Fresno in October 2017. This Addendum to the SWFSP EIR evaluates whether the proposed minor modification to the SWFSP associated with the proposed project would result in new or substantially more adverse significant effects or require new mitigation measures not identified in the SWFSP EIR. Attachment A to this Addendum provides a complete description of the proposed project, its location, existing site characteristics, proposed development, and required approvals and entitlements. The City is the lead agency for the proposed project under the California Environmental Quality Act (CEQA). In accordance with CEQA Section 21093(b) and CEQA Guidelines Section 15152(a), this Addendum tiers off the SWFSP EIR, which is hereby incorporated by reference.

INTRODUCTION

The proposed project represents a minor modification to the SWFSP that is limited to the rezoning of 11 parcels located in the SWFSP Plan Area from Neighborhood Mixed Use (NMX) to the prior designation of Industrial - Light (IL). The IL zoning district is intended to provide a diverse range of light industrial uses, including limited manufacturing and processing, research and development, fabrication, utility equipment and service yards, wholesaling, warehousing, and distribution activities. Small-scale retail and ancillary office uses are also permitted. Light industrial areas may serve as buffers between Heavy Industrial zoning districts and other land uses and otherwise are generally located in areas with good transportation access, such as along railroads and freeways. The proposed zoning would be consistent with the existing uses within the project site.

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1 City of Fresno. 2017. *Southwest Fresno Specific Plan*. October.

2 City of Fresno. 2017. *Southwest Fresno Specific Plan Environmental Impact Report*. State Clearinghouse Number: 2017031012. October.

In addition to the proposed zoning change, the proposed project would also include land use amendments to the SWFSP and General Plan in order for the land use designations to be consistent with the proposed zoning and an amendment to the following policy of the SWFSP:

LU-8.1 Plan and zone employment areas in Southwest Fresno for nonindustrial businesses. All previously designated Light Industrial, Heavy Industrial, Business Park, and Regional Business Park land uses should be planned and zoned Office, except for the area bounded by Vine Avenue on the north, State Route 41 on the east, Elm Avenue on the west, and ~~Annadale Avenue~~East Chester/Samson Avenue alignment on the south, in order to allow the continuation of legally established ~~and non-polluting uses established and~~uses operating as of February 18, 2021.

The proposed project does not include any physical changes to the project site, including construction or change in the current land uses.

Additionally, in order to address the concerns raised by the surrounding community regarding the proposed rezoning, the property owners have agreed to adding conditions to the proposed zoning that will restrict future uses. Any further development on the 11 parcels would be subject to conditions of zoning restricting future land uses outlined in Attachment A to this Addendum, summarized below:

A. Certain uses, like research and development facilities, chemical storage (with compliance to CalARP), and new industrial uses with specific criteria, require a Conditional Use Permit regardless of any future changes in the City Code.

B. Several land uses, including emergency shelters; hospitals; parking, public or private; adult-oriented businesses; kennels; large vehicle and equipment sales, services and rental facilities; motorcycle/riding clubs; airports and heliports; major utilities; crop cultivation; concrete batch plants; shooting/archery ranges; swap meets / flea markets; towing and impound facilities; rubber products manufacturing; nonmetallic mineral product manufacturing; primary metal manufacturing; fabricated metal product manufacturing; automotive and heavy equipment manufacturing; CRV recycling centers; recycling processing facilities; and waste transfer facilities, are not permitted.

C. Some land uses, including animal raising and dairy facilities, slaughterhouses, rendering plants, sales lots, feed lots or stockyards, salvage and wrecking, mining and quarrying and intensive industrial uses are currently not permitted in the IL zone district and will continue to be prohibited, even if the City adopts less restrictive zoning regulations.

D. The expansion of existing structures cannot exceed 10% of the exterior footprint as of October 13, 2022.

E. All truck trips to and from the property must follow designated City truck routes, avoiding school areas and residential neighborhoods.

F. All properties must comply with landscaping requirements outlined in Section 15-2305(B)(4) of City Ordinance.

G. New uses should not generate detectable offsite odors.

H. Noise levels from new uses must not exceed Fresno Municipal Code limitations.

I. New industrial uses must connect to the City's municipal water system; private well groundwater usage is not allowed.

J. Compliance with permits and certificates related to stationary sources and truck regulations is mandatory for new industrial uses.

K. Tenant improvements and construction activities for new industrial use must comply with California Green Building Standards.

L. Full compliance with the California Accidental Release Prevention (CalARP) program is required, preventing regulated substances from migrating offsite.

M. In case of contamination discovery on the property, landowners must cooperate with governmental entities overseeing investigation and remediation, with no limitations on seeking indemnification or contribution from other parties.

This Addendum is prepared pursuant to CEQA Guidelines Section 15164 which states: "The lead agency or a responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary, but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred." Section 15162 specifies that "no subsequent EIR shall be prepared for that project unless the lead agency determines … one or more of the following:"

1. Substantial changes are proposed in the project which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;

2. Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or

3. New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete was adopted, shows any of the following:

    a. The project will have one or more significant effects not discussed in the previous EIR;

b. Significant effects previously examined will be substantially more severe than shown in the previous EIR;

c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or

d. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

Pursuant to CEQA Guidelines Section 15164(e), the purpose of this Addendum is to describe and evaluate the proposed project (rezoning 11 parcels located in the SWFSP Plan Area), assess the proposed modifications to the project evaluated in the SWFSP EIR, and identify the reasons for the City's conclusion that changes introduced by the proposed project and associated environmental effects do not meet the conditions described in CEQA Guidelines Section 15162 calling for preparation of a subsequent or supplemental EIR.

Attachment A to this Addendum provides a complete description of the proposed project, its location, existing site characteristics, proposed development, and required approvals and entitlements.

Attachment B to this Addendum provides the Environmental Checklist prepared for the project. This checklist provides information to: (1) compare the environmental impacts of the proposed project with impacts expected to result from development approved in the SWFSP and evaluated in the SWFSP EIR; (2) demonstrate that the proposed project would not result in new or more severe significant environmental impacts, and; (3) identity if substantial changes with respect to the circumstances under which the proposed project would be undertaken would result in new or more severe significant environmental effects that were not identified when the SWFSP EIR was certified.

COMPARISON TO THE CONDITIONS LISTED IN CEQA GUIDELINES SECTIONS 15162 AND 15163

The following discussion summarizes the reasons that a subsequent or supplemental EIR, pursuant to CEQA Guidelines Sections 15162 and 15163, is not required and an Addendum to the SWFSP EIR is the appropriate CEQA document.

Substantial Changes

Per the analysis included in Attachment B, Environmental Checklist, the proposed project would not result in new significant impacts beyond those identified in the SWFSP EIR, would not substantially increase the severity of impacts identified in the SWFSP EIR, and would not require major revisions to the SWFSP EIR. Therefore, the proposed changes to the project would be minor modifications, not substantial changes, and an Addendum is the appropriate document to address these minor modifications rather than a subsequent or supplemental EIR.

Substantial Changes in Circumstances

As described in the Environmental Checklist for each topic, environmental conditions in and around the project site have not changed such that implementation of the project's proposed minor modifications to the SWFSP EIR would result in new significant environmental effects or a substantial increase in the severity of environmental effects identified in the SWFSP EIR, and thus would not require major revisions to the SWFSP EIR.

New Information

No new information of substantial importance, which was not known or could not have been known when the SWFSP EIR was certified, has been identified which shows that the project's proposed minor modifications to the SWFSP EIR would be expected to result in: (1) new significant environmental effects not identified in the SWFSP EIR; (2) substantially more severe environmental effects than shown in the SWFSP EIR; (3) mitigation measures or alternatives previously determined to be infeasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the City declines to adopt the mitigation measure or alternative; or (4) mitigation measures or alternatives which are considerably different from those analyzed in the SWFSP EIR would substantially reduce one or more significant effects on the environment, but the City declines to adopt the mitigation measure or alternative. In addition, the project's proposed minor modifications would require no new mitigation measures, as described throughout the Environmental Checklist, because no new or substantially more severe impacts are expected beyond those identified in the SWFSP EIR.

CONCLUSION

The project's proposed minor modifications to the SWFSP EIR described in this Addendum would not require major revisions to the SWFSP EIR due to new or substantially increased significant environmental effects. The analysis contained in the Environmental Checklist confirms that the project's proposed minor modifications are within the scope of the SWFSP EIR and will have no new or more severe significant effects and no new mitigation measures are required. Therefore, no subsequent or supplemental EIR or further CEQA review is required prior to approval of the proposed project, as described in this Addendum.

Attachment A: Project Description

Attachment B: Environmental Checklist

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ATTACHMENT A
PROJECT DESCRIPTION

The following describes the proposed Elm Avenue Rezone project (proposed project) that includes rezoning 11 parcels by the City of Fresno (City). In addition to the description of the proposed project itself, this section includes a summary description of the project's location and existing site characteristics. The proposed project is located in the Plan Area of the Southwest Fresno Specific Plan (SWFSP).[1] This project description is part of the preparation of an Addendum to the SWFSP Environmental Impact Report (EIR),[2] which was certified by the City of Fresno in October 2017. The City is the lead agency for the proposed project under the California Environmental Quality Act (CEQA).

PROJECT SITE

The following section describes the location and site characteristics for the project site and provides a brief overview of the existing land uses within and in the vicinity of the site.

Location and Surrounding Land Uses

The project site is located in the city of Fresno, which occupies approximately 110 square miles in the San Joaquin Valley. Within Fresno, the project site is located in the SWFSP Plan Area, which consists of approximately 3,255 acres located generally west of State Route (SR) 41 and south of SR 180 in the southwest area of Fresno. The project site is bounded by South Elm Avenue to the west, East Annadale Avenue to the north, SR 41 to the east, and adjacent parcels and East North Avenue to the south. Figure 1 shows the regional and local context of the vicinity of the project site.

Regional vehicular access to the project site is provided by SR 41, located directly adjacent to the project site, SR 99, approximately 1 mile to the east, and SR 180, approximately 3 miles north of the project site. Industrial and commercial uses are located to the north, west, east, and south of the project site. The surrounding land uses include light industrial to the west, light industrial uses to the north, SR 41 and heavy industrial uses to the east, and a pallet yard, a vacant property, and a ponding basin to the south. Figure 2 shows an aerial photograph of the existing area and surrounding land uses.

Site Characteristics and Current Site Conditions

The project site consists of 11 parcels totaling approximately 55.3 acres. The Assessor's Parcel Numbers (APNs) and approximate size of each parcel within the project site are included in Table 1. As shown in Figure 2, the project site contains several existing light industrial buildings.

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1 City of Fresno. 2017. *Southwest Fresno Specific Plan*. October.

2 City of Fresno. 2017. *Southwest Fresno Specific Plan Environmental Impact Report*. State Clearinghouse Number: 2017031012. October.

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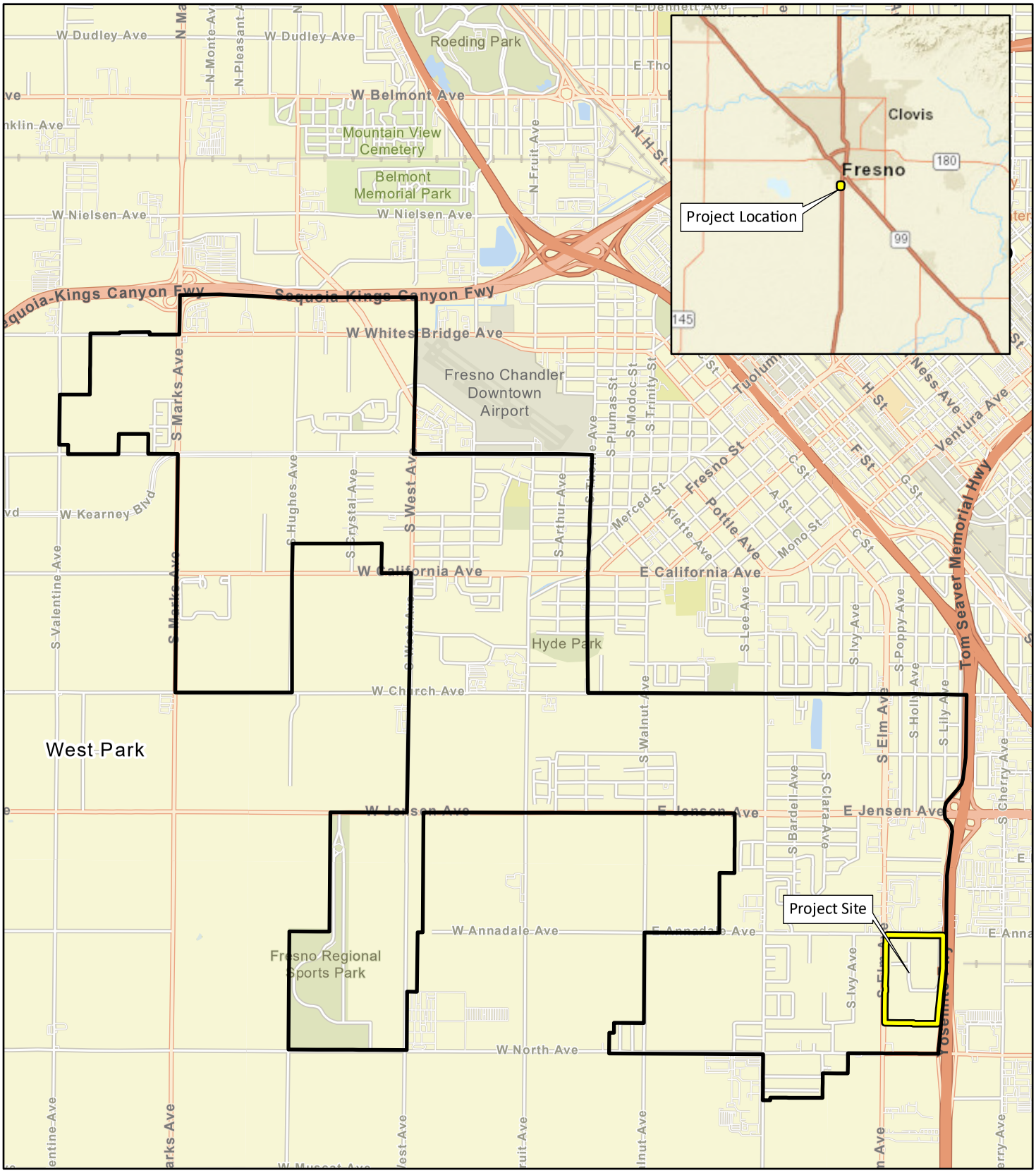

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LEGEND

Project Site

Southwest Fresno Specific Plan Area

FIGURE 1

N

0 1500 3000

FEET

Elm Avenue Rezone Project

Project Location and Regional Vicinity Map

SOURCE: ESRI World Street Maps (2023); City and County of Fresno (2020).

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Project Site Boundary

0 500 1000
FEET

FIGURE 2

Elm Avenue Rezone Project
Aerial Photograph and Surrounding Land Uses

SOURCE: Google Earth, 4/21/2021.

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Table 1: Parcels within the Project Site

Assessor's Parcel Number	Area (acres)
328-290-25	24.73
328-290-28	6.36
328-290-29	6.25
328-211-43	2.41
328-211-44	1.88
328-211-45	2.84
328-211-46	2.83
328-211-47	1.95
328-211-48	2.13
328-211-49	1.73
328-211-50	2.20
Total	**55.31**

Source: City of Fresno, 2020

The project site is currently used as a mix of light industrial manufacturing, warehousing, and distribution, totaling 896,952 square feet of floor space.

General Plan and Southwest Fresno Specific Plan

The current General Plan Planned Land Use designation and zoning for the project site is Neighborhood Mixed Use (NMX). Figure 3 shows the existing zoning of the project site and in the vicinity of the project site.

The NMX zoning district is intended to provide mixed-use residential zoning districts that include local-serving, pedestrian-oriented commercial development, such as smaller independent retail shops and professional offices in two- to three-story buildings. Development within the NMX zoning district is expected to include ground-floor neighborhood retail uses and upper-level housing or offices, with a mix of small lot single-family houses, townhomes, and multi-family dwelling units on side streets, in a horizontal or vertical mixed-use orientation. The NMX zoning district provides for a scale and character of development that is pedestrian-orientated, designed to attract and promote a walk-in clientele, with small lots and frequent pedestrian connections permitting convenient access from residences to commercial space.

In October 2017, the City adopted the SWFSP to implement the goals and policies set forth in the City of Fresno General Plan (Fresno General Plan) and include ideas and measures that were tailored and reviewed by members of the Southwest Fresno community. The SWFSP provides guiding principles, policies, development criteria, and implementation strategies to coordinate private development and public improvements given the unique opportunities and characteristics of Southwest Fresno. The SWFSP identified a development capacity of approximately 748,820 square feet of employment land uses (which includes light industrial uses). However, like the General Plan, the development capacity identified in the SWFSP only identifies new development and only takes into account the development of parcels that have higher opportunities for development, such as parcels that are vacant, open agriculture, or rural residential (partially vacant). The SWFSP does not identify the project site as an opportunity site identified for development. Upon adoption of the

SWFSP the land use designation and zoning of the project site was changed from Industrial – Light (IL) to Neighborhood Mixed Use (NMX).

PROPOSED PROJECT

The current uses within the project site as described above are inconsistent with the existing zoning of NMX. The proposed project consists of rezoning 11 parcels located in the SWFSP Plan Area from NMX to the prior designation of Industrial - Light (IL). The IL zoning district is intended to provide a diverse range of light industrial uses, including limited manufacturing and processing, research and development, fabrication, utility equipment and service yards, wholesaling, warehousing, and distribution activities. Small-scale retail and ancillary office uses are also permitted. Light industrial areas may serve as buffers between Heavy Industrial zoning districts and other land uses and otherwise are generally located in areas with good transportation access, such as along railroads and freeways. The proposed zoning would be consistent with the existing uses within the project site.

In addition to the proposed zoning change, the proposed project would also include land use amendments to the SWFSP and General Plan in order for the land use designations to be consistent with the proposed zoning and an amendment to the following policy of the SWFSP:

LU-8.1 Plan and zone employment areas in Southwest Fresno for nonindustrial businesses. All previously designated Light Industrial, Heavy Industrial, Business Park, and Regional Business Park land uses should be planned and zoned Office, except for the area bounded by Vine Avenue on the north, State Route 41 on the east, Elm Avenue on the west, and ~~Annadale Avenue~~East Chester/Samson Avenue alignment on the south, in order to allow the continuation of legally established ~~and non-polluting uses established and~~uses operating as of February 18, 2021.

The proposed project does not include any physical changes to the project site, including construction or change in the current land uses.

In order to address concerns raised by the community regarding the proposed rezone of the 11 parcels, the property owners have agreed to adding conditions to the zoning that will restrict future uses. Any further development on the 11 parcels would be conditioned upon the following conditions of zoning:

A. Notwithstanding any contrary provisions in the City Code, the following uses shall be subject to a Conditional Use Permit regardless of any future changes in the City Code:

   1. Research and development, chemical

   2. Chemical and Mineral Storage, other than incidental storage that comprises less than 5% of the premises, subject to demonstration to the City that the use fully complies with the California Accidental Release Prevention (CalARP) program.

3. Any new industrial use in the IL zone district that is permitted or permitted conditionally, and that would (i) result in the construction of a new structure of more than 1,000 square feet; (ii) result in the expansion of any existing structure by more than 5% compared to the gross floor area existing as of the date upon which the underlying property was rezoned to the Base District; or (iii) require permitting under Title V of the Clean Air Act.

B. Notwithstanding any contrary provisions in the City Code, the following land uses shall not be permitted:

1. Emergency Shelter
2. Hospital
3. Parking, Public or Private
4. Adult-Oriented Business
5. Kennels
6. Large Vehicle and Equipment Sales, Services and Rental
7. Motorcycle/Riding Club
8. Airports and Heliports
9. Utilities, Major
10. Crop Cultivation
11. Concrete Batch Plants
12. Shooting/Archery Range
13. Swap Meet / Flea Market
14. Towing and Impound
15. Rubber products manufacturing
16. Nonmetallic mineral product manufacturing
17. Primary metal manufacturing
18. Fabricated metal product manufacturing
19. Automotive and heavy equipment manufacturing

20. CRV Recycling Center

21. Recycling Processing Facility

22. Waste Transfer Facility

C. Pursuant to Section 15-1302 of the City Code, the following uses are currently not permitted in the IL zone district. The prohibition of any such land uses shall continue to apply even if the City adopts less restrictive citywide use limitations for the IL zoning district.

1. Animal Raising

2. Dairy

3. Intensive Industrial

4. Mining and Quarrying

5. Rendering

6. Salvage and Wrecking

7. Sales Lot, Feed Lot, Stockyard

8. Slaughterhouse

D. The interior footprint of any existing structure shall not be expanded by an area greater than ten percent (10%) of the existing exterior footprint as depicted in the most recent site plan for any structure on file with the City as of October 13, 2022.

E. Any truck trips to or from the property shall only follow truck routes designated by the City of Fresno. All truck routes shall avoid pathways adjacent to schools or that traverse through residential neighborhoods.

F. All properties must be landscaped in accordance with Section 15-2305(B)(4) of the City Ordinance.

G. No new use shall generate odors that are detectable offsite.

H. No new use shall generate noise at a level that exceeds the limitations provided in the Fresno Municipal Code.

I. Any new industrial use must tie-in to the City's municipal water system. The use of groundwater from private wells is not permitted.

J. All new industrial uses must acquire and maintain at all times (i) any permits required for any stationary sources, and (ii) certificates from the California Air Resources Board showing

compliance with all applicable regulations governing trucks, including yard trucks, that enter onto the Project site, including but not limited to the Truck and Bus Regulation, the Advanced Clean Trucks Regulation, and the Advanced Clean Fleets Regulation

K. Any tenant improvements or other construction activities performed for any new industrial use shall comply with California Green Building Standards.

L. All industrial uses shall fully comply with the California Accidental Release Prevention (CalARP) program. No industrial use shall allow any substance regulated under the CalARP program or other hazardous substance to migrate offsite.

M. In the event that any contamination is discovered on the property, the landowner shall cooperate in good faith and with reasonable diligence with the investigation and remediation of the property by the governmental entity or entities overseeing such investigation and remediation. Nothing herein shall be construed as limiting the right of any landowner to seek indemnification or contribution from any person or entity.

AMENDMENTS

As part of the proposed project evaluated in this Addendum, the following approvals and permits would be required:

- Plan Amendment to rezone and change land use designations of 11 parcels from Neighborhood Mixed Use (NMZ) to Industrial - Light (IL).
- Amendment to Policy LU-8.1 of the SWFSP.
- Addition of Conditions of Zoning restricting future use.

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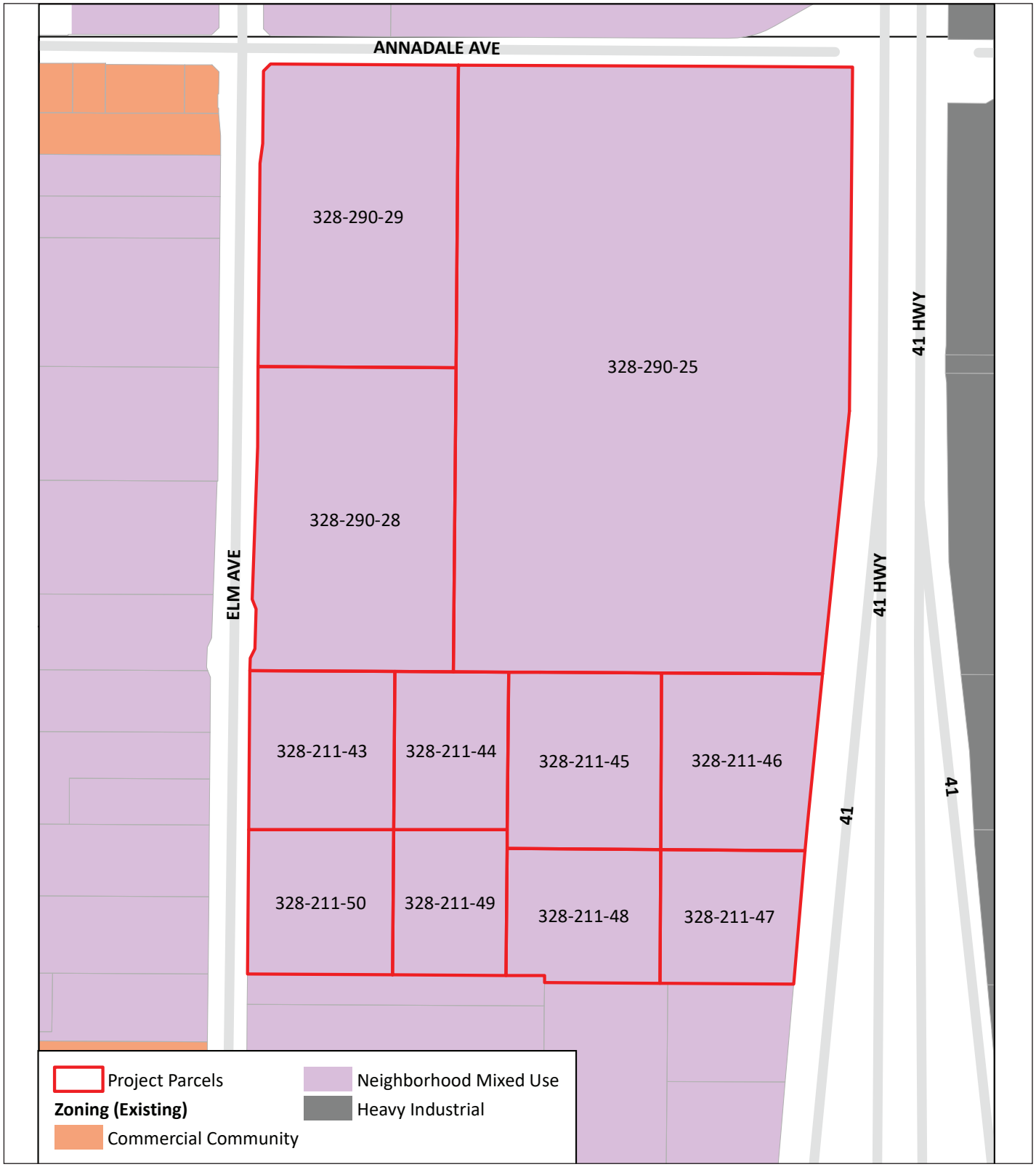

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FIGURE 3

0 0.03 0.06 0.12 0.18 Miles

SOURCE: City of Fresno, 8/2/23

Elm Avenue Rezone Project
Existing Zoning in the Vicinity of the Project Site

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ATTACHMENT B
ENVIRONMENTAL CHECKLIST
PURSUANT TO CEQA GUIDELINES SECTION 15168

CEQA Guidelines 15168(c)(4) recommends using a written checklist or similar device to confirm whether the environmental effects of a subsequent activity were adequately covered in a program EIR. This checklist confirms that the proposed Elm Avenue Rezone project (proposed project) described in Attachment A is within the scope of the Southwest Fresno Specific Plan (SWFSP) Environmental Impact Report (EIR),[1] which was certified by the City of Fresno (City) in October 2017. The proposed project would not result in new or substantially more severe significant effects, and no new mitigation measures are required for the proposed project.

In accordance with CEQA Section 21093(b) and CEQA Guidelines Section 15152(a), this Addendum tiers off the SWFSP EIR, which are hereby incorporated by reference.

This environmental checklist is used to: (1) compare the environmental impacts of the proposed project with impacts expected to result from development approved in the SWFSP and evaluated in the SWFSP EIR; (2) to identify whether the proposed project would result in new or more severe significant environmental impacts; (3) to identify if new or revised mitigation measures would be required by the project sponsor; and (4) to identity if substantial changes with respect to the circumstances under which the project would be undertaken since the SWFSP EIR was certified would result in new or more severe significant environmental effects.

In summary, no new or more severe significant impacts were identified for the proposed project that were not identified and mitigated in the SWFSP EIR, and no new mitigation measures would be required for the proposed project. For all environmental topics addressed in the following checklist, there have been no substantial changes in environmental circumstances that would result in new or more severe significant environmental effects than were identified and evaluated in the SWFSP EIR. Therefore, no subsequent EIR or CEQA evaluation is required for the Elm Avenue Rezone project.

[1] City of Fresno. 2017. *Southwest Fresno Specific Plan Environmental Impact Report*. State Clearinghouse Number: 2017031012. October.

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1. AESTHETICS

	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New Impact
Except as provided in Public Resources Code Section 21099, would the project:				
a. Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway	☐	☐	☐	☒
c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☐	☒
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☐	☒

Discussion

Scenic Vistas

As discussed in the SWFSP EIR, the Fresno General Plan does not identify any scenic vistas from within the City. Although the General Plan identifies six locations as publicly valued scenic features along the San Joaquin River bluffs, the river bluffs are not visible from the Plan Area due to the flat topography of the City. The Fresno General Plan, as noted in Policy MT-3-a, identifies Kearney Boulevard from Fresno Street to Polk Avenue as a scenic corridor. Policy MT-3-b requires that street trees lining designated scenic corridors, such as the palm trees on Kearney Boulevard, be preserved. The proposed project does not include any physical changes to the project site, including construction or change in the current land uses. Therefore, impacts associated with the proposed project would not result in new impacts to scenic vistas or substantially increase the severity of impacts identified in the SWFSP EIR.

Scenic Resources

There are no State-designated scenic highways within the City. Therefore, impacts associated with the proposed project would not result in new impacts to scenic resources or substantially increase the severity of impacts identified in the SWFSP EIR.

Visual Character

The proposed project consists of rezoning 11 parcels located in the SWFSP Plan Area from Neighborhood Mixed Use (NMX) to the prior designation of Industrial - Light (IL). The proposed zoning would be consistent with the existing uses within the project site, and would not change the existing visual character substantially. Additionally, pursuant to the conditions of zoning included with the proposed project for any further development on the 11 parcels, as described in Attachment A, all properties within the project site must be landscaped in accordance with Section

15-2305(B)(4) of the City Ordinance. Therefore, the proposed project would not degrade the visual character of the project site or result in a potential impact to the visual character that would be more severe than the impacts identified in the SWFSP EIR.

Light and Glare

The project site is located in an urbanized area and is currently developed with several existing light industrial buildings. The proposed zoning would be consistent with the existing uses within the project site. In addition, the proposed project does not include any physical changes to the project site, including construction or change in the current land uses. As a result, the proposed project would not result in substantial light or glare. Therefore, the proposed project would not create impacts related to light and glare more severe than impacts identified in the SWFSP EIR.

Applicable Mitigation

No substantial changes in environmental circumstances have occurred for this topic, nor revisions to the project, nor new information that could not have been known at the time the SWFSP EIR was certified leading to new or more severe significant impacts, and no new mitigation measures are required.

Conclusion

The SWFSP EIR adequately evaluated the aesthetic impacts of the proposed project. Therefore, there would be no new impacts related to aesthetics associated with the proposed project and additional mitigation is not required.

2. AGRICULTURE AND FORESTRY RESOURCES

	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New Impact
Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	☐	☐	☐	☒
d. Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

Discussion

The SWFSP EIR concluded that there are areas of "Prime Farmland" and "Farmland of Local Importance" scattered throughout the SWFSP Plan Area. The remainder of the SWFSP Plan Area is considered Urban Built-Up Land. According to the associated Williamson Act Property map, there are no Williamson Act properties within the SWFSP Plan Area. The project site is designated as Urban Built-Up Land; therefore, there are no agricultural uses located in or near the project site. Therefore, the proposed project would have no impacts on agriculture or forestry resources.

Applicable Mitigation

No substantial changes in environmental circumstances have occurred for this topic, nor revisions to the project, nor new information that could not have been known at the time the SWFSP EIR was certified leading to new or more severe significant impacts, and no new mitigation measures are required.

Conclusion

The SWFSP EIR adequately evaluated the agriculture and forestry resources impacts of the proposed project. Therefore, there would be no new impacts related to agricultural and forestry resources associated with the proposed project and additional mitigation is not required.

3. AIR QUALITY

	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New Impact
Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☐	☒
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☐	☒
c. Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☐	☒
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☐	☒

Discussion

Clean Air Plan Consistency

The City of Fresno is part of the San Joaquin Valley Air Basin (SJVAB), which is within the jurisdiction of the San Joaquin Valley Air Pollution Control District (SJVAPCD). The SJVAPCD is responsible for air quality regulation within the eight-county San Joaquin Valley region.

Both the State of California (State) and the federal government have established health-based Ambient Air Quality Standards (AAQS) for six criteria air pollutants: carbon monoxide (CO), Ozone (O_3), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), lead (Pb), and suspended particulate matter ($PM_{2.5}$ and PM_{10}). The SJVAB is designated as non-attainment for O_3 and $PM_{2.5}$ for federal standards and non-attainment for O_3, PM_{10}, and $PM_{2.5}$ for State standards.

Air quality monitoring stations are located throughout the nation and maintained by the local air districts and State air quality regulating agencies. Data collected at permanent monitoring stations are used by the U.S. Environmental Protection Agency (USEPA) to identify regions as “attainment” or “nonattainment” depending on whether the regions meet the requirements stated in the applicable National Air Quality Standards (NAAQS). Nonattainment areas are imposed with additional restrictions as required by the USEPA. In addition, different classifications of attainment, such as marginal, moderate, serious, severe, and extreme, are used to classify each air basin in the State on a pollutant-by-pollutant basis. The classifications are used as a foundation to create air quality management strategies to improve air quality and comply with the NAAQS. The SJVAB attainment statuses for each of the criteria pollutants are listed in Table A.

Table A: SJVAB Air Quality Attainment Status

Pollutant	State	Federal
Ozone (1-hour)	Severe/Nonattainment	Standard Revoked
Ozone (8-hour)	Nonattainment	Extreme Nonattainment
PM_{10}	Nonattainment	Attainment (Maintenance)
$PM_{2.5}$	Nonattainment	Nonattainment
Carbon Monoxide	Attainment	Attainment (Maintenance)
Nitrogen Dioxide	Attainment	Unclassified/Attainment
Lead	Attainment	Unclassified/Attainment
Sulfur Dioxide	Attainment	Unclassified
Sulfates	Attainment	No Federal Regulation
Hydrogen Sulfide	Unclassified	No Federal Regulation

Source: San Joaquin Valley Air Pollution Control District (2016).

An air quality plan describes air pollution control strategies to be implemented by a city, county, or region classified as a non-attainment area. The main purpose of the air quality plan is to bring the area into compliance with the requirements of the federal and State air quality standards. To bring the San Joaquin Valley into attainment, the SJVAPCD adopted the 2016 Plan for the 2008 8-Hour Ozone Standard in June 2016 to satisfy Clean Air Act requirements and ensure attainment of the 75 parts per billion (ppb) 8-hour ozone standard.[2]

To assure the SJVAB's continued attainment of the USEPA PM_{10} standard, the SJVAPCD adopted the 2007 PM_{10} Maintenance Plan in September 2007.[3] The SJVAPCD adopted the 2018 Plan for the 1997, 2006, and 2012 $PM_{2.5}$ Standards in November 2018 to address the USEPA 1997 annual $PM_{2.5}$ standard of 15 $\mu g/m^3$ and 24-hour $PM_{2.5}$ standard of 65 $\mu g/m^3$, the 2006 24-hour $PM_{2.5}$ standard of 35 $\mu g/m^3$, and the 2012 annual $PM_{2.5}$ standard of 12 $\mu g/m^3$.[4]

CEQA requires that certain proposed projects be analyzed for consistency with the applicable air quality plan. For a project to be consistent with SJVAPCD air quality plans, the pollutants emitted from a project should not exceed the SJVAPCD emission thresholds or cause a significant impact on air quality. In addition, emission reductions achieved through implementation of offset requirements are a major component of the SJVAPCD air quality plans.

As discussed in the SWFSP EIR, CEQA Guidelines Section 15206(b) states that a project is of Statewide, regional, or area-wide significance if it is a residential development of more than 500 dwelling units or a commercial office building of 250,000 square feet or more or that employs 1,000

2 San Joaquin Valley Air Pollution Control District. 2016. *2016 Plan for the 2008 8-Hour Ozone Standard*. June 16. Website: https://ww2.valleyair.org/rules-and-planning/air-quality-plans/ozone-plans/2016-plan-for-the-2008-8-hour-ozone-standard/ (accessed December 2024).

3 San Joaquin Valley Air Pollution Control District. 2007. *2007 PM_{10} Maintenance Plan and Request for Redesignation*. Available online at: www.valleyair.org/Air_Quality_Plans/docs/Maintenance%20Plan10-25-07.pdf (accessed December 2024).

4 San Joaquin Valley Air Pollution Control District. 2018. *2018 Plan for the 1997, 2006, and 2012 $PM_{2.5}$ Standards*. November 15. Available online at: valleyair.org/pmplans/documents/2018/pm-plan-adopted/2018-Plan-for-the-1997-2006-and-2012-PM2.5-Standards.pdf (accessed December 2024).

or more employees. Specifically, the SWFSP would introduce up to 4,512,586 square feet of non-residential building space and 7,131 new dwelling units in addition to 8,671 new jobs over existing conditions in the SWFSP Plan Area, and is therefore a project of Statewide, regional, or area-wide significance. Thus, the SWFSP EIR found that implementation of the SWFSP would have the potential to substantially increase Fresno Council of Governments (Fresno COG) demographic projections beyond what is already anticipated for the SWFSP Plan Area. In addition, the SWFSP EIR found that the SWFSP would generate long-term emissions of criteria air pollutants that would exceed SJVAPCD's regional operation-phase significance thresholds and, therefore, implementation of the SWFSP would result in an increase in the frequency or severity of existing air quality violations, cause or contribute to new violations, or delay timely attainment of the AAQS.

The proposed project consists of rezoning 11 parcels located in the SWFSP Plan Area from Neighborhood Mixed Use (NMX) to the prior designation of Industrial - Light (IL). The proposed project does not include any physical changes to the project site, including construction or change in the current land uses. The proposed project would not increase population or housing units and would not affect the Fresno COG's demographic projections. Additionally, existing development is consistent with the rezone project and is subject to the General Plan goals and policies that would reduce air impacts. Furthermore, pursuant to Conditions of Zoning B and C for the proposed project, as included in Attachment A, for any further development in the 11-parcel project site, the development of land uses that generate high-level emissions of criteria air pollutants, including uses like major utilities, concrete batch plants, crop cultivation, dairy farms and animal raising facilities, mining and quarrying uses, intensive industrial uses, heavy manufacturing uses and recycling processing and waste transfer facilities, is prohibited. Additionally, as described in Condition of Zoning J, all new industrial uses must acquire and maintain at all times any permits required for any stationary sources, and certificates from the California Air Resources Board (CARB) showing compliance with all applicable regulations governing trucks, including yard trucks, that enter onto the project site, including but not limited to the Truck and Bus Regulation, the Advanced Clean Trucks Regulation, and the Advanced Clean Fleets Regulation. Therefore, the proposed project would not result in new or more significant air quality impacts than were analyzed and described in the SWFSP EIR.

Criteria Pollutant Analysis

Short-Term Construction Emissions. As identified in the SWFSP EIR, construction activities would temporarily increase PM_{10}, $PM_{2.5}$, volatile organic compounds (VOC), nitrogen oxides (NO_x), and CO regional emissions within the SJVAB. The primary source of NO_x, CO, and sulfur oxides (SO_x) emissions is the operation of construction equipment. The primary sources of particulate matter (PM_{10} and $PM_{2.5}$) emissions are activities that disturb the soil, such as grading and excavation, road construction, and building demolition and construction. The primary source of VOC emissions is the application of architectural coating and off-gas emissions associated with asphalt paving.

The SFWSP EIR found that construction activities associated with implementation of the SWFSP could potentially exceed the SJVAPCD regional threshold for VOC and NO_x, which would contribute to the O_3, PM_{10}, and $PM_{2.5}$ nonattainment designations of the SJVAB. As part of the development process, individual, site-specific projects accommodated under the SWFSP that meet the criteria of Rule 9510 would be required to prepare a detailed air quality impact assessment (AIA). To the

extent applicable under Rule 9510 for each such individual development, SJVAPCD would require calculation of the construction emissions from the development. The purpose of the AIA is to confirm a development's construction exhaust emissions, and therefore be able to identify appropriate mitigation, either through implementation of specific mitigation measures (e.g., use of construction equipment with Tier 4-rated engines) or payment of applicable off-site fees. As stated, under Rule 9510, each project that is subject to this Rule would be required to reduce construction exhaust emissions by 20 percent for NO_x or pay offset mitigation fees for emissions that do not achieve the mitigation requirements. While adherence to Rule 9510 would contribute to reducing exhaust NO_x emissions, it would not be applicable to reducing VOC emissions generated operation of equipment and from off-gassing from asphalt and paints. Therefore, the SWFSP EIR found that SWFSP-related construction activities would result in significant regional air quality impacts. The SWFSP EIR identified Mitigation Measures AQ-2a through AQ-2c and AQ-4b to reduce construction-related criteria air pollutant emissions to the extent feasible; however, impacts would remain significant and unavoidable.

The proposed project consists of rezoning 11 parcels located in the SWFSP Plan Area from Neighborhood Mixed Use (NMX) to the prior designation of Industrial - Light (IL). The proposed project does not include any physical changes to the project site, including construction or change in the current land uses. The proposed zoning would be consistent with the existing uses within the project site. In addition, the proposed project does not include any physical changes to the project site, including construction or change in the current land uses. As a result, the proposed project would not result in new or more severe impacts related to construction-related, short-term air quality impacts beyond those analyzed in the SWFSP EIR.

Long-Term Operational Emissions. The SWFSP EIR determined that buildout of the SWFSP would result in direct and indirect criteria air pollutant emissions from transportation, energy (e.g., natural gas use), and area sources (e.g., aerosols and landscaping equipment). The SWFSP EIR found that operation of the SWFSP at buildout would generate air pollutant emissions that exceed SJVAPCD's regional significance thresholds for VOC, NO_x, CO, PM_{10}, and $PM_{2.5}$ at buildout. Emissions of VOC and NO_x that exceed the SJVAPCD regional threshold would cumulatively contribute to the O_3 and particulate matter (PM_{10} and $PM_{2.5}$) nonattainment designations of the SJVAB.

In addition, the SWFSP EIR found that similar to construction-related emissions, application of SJVAPCD Rule 9510 to future individual projects would contribute to reducing NO_x and particulate matter emissions. In addition, application of SJVACPD Rule 9510 would contribute to reducing mobile-source emissions. Furthermore, the SWFSP EIR found that the planned improvements, guidelines, objectives, and policies under the SWFSP would generally support a more sustainable development pattern to accommodate growth within the area by creating complete neighborhoods and providing more transit options through improvements to the pedestrian, bicycle, public transportation, and alternative fueled vehicle networks and infrastructure, which would contribute in minimizing long-term criteria air pollutant emissions. However, while SJVAPCD rules and policies of the SWFSP may contribute to reducing operation-related regional air quality impacts of individual projects accommodated under the SWFSP to less than significant, the projected cumulative emissions associated with future development projects would be in exceedance. Therefore, the

SWFSP EIR concluded that implementation of the SWFSP would result in a significant impact because it would significantly contribute to the nonattainment designations of the SJVAB.

The project site is located in an urbanized area and is currently developed with several existing light industrial buildings. The proposed zoning would be consistent with the existing uses within the project site. In addition, the proposed project does not include any physical changes to the project site, including construction or change in the current land uses. As such, the proposed project is not expected to substantially increase long-term operational emissions at the project site compared to the SWFSP EIR. Furthermore, pursuant to Conditions of Zoning B and C for the proposed project, as included in Attachment A, the development of land uses that generate high-level emissions of criteria air pollutants, including uses like major utilities, concrete batch plants, crop cultivation, dairy farms and animal raising facilities, mining and quarrying uses, intensive industrial uses, heavy manufacturing uses and recycling processing and waste transfer facilities is prohibited in the 11-parcel project site. In addition, individual projects within the SWFSP Plan Area that exceed project level significance thresholds after accounting for Rule 9510 reductions would also be required to implement additional mitigation measures to reduce significant emissions. Therefore, because the proposed project would not result in any physical changes to the project site, and high emission uses are restricted in the project site by conditions of zoning, the proposed project would not result in any new or more significant operational air quality impacts than were described in the SWFSP EIR.

CO Hotspots. Areas of vehicle congestion have the potential to create pockets of CO called hotspots. These pockets have the potential to exceed the State 1-hour standard of 20 ppm or the 8-hour standard of 9.0 ppm. The SWFSP EIR found that buildout of the SWFSP would result in increase in total daily vehicle trips over existing conditions. However, distributing the total daily vehicle trips within the SWFSP EIR and region and by peak hour would result in smaller traffic volumes at the various intersections. Thus, the SWFSP EIR found that implementation of the SWFSP is not anticipated to produce the volume of traffic required to generate a CO hotspot. Therefore, impacts were considered to be less than significant. The proposed zoning would be consistent with the existing uses within the project site. In addition, the proposed project does not include any physical changes to the project site, including construction or change in the current land uses. As such, the proposed project would not result in any new or more significant CO hotspot impacts than were described in the SWFSP EIR.

Expose Sensitive Receptors to Substantial Pollutant Concentrations

The SWFSP EIR identified a variety of pollutant or toxic air contaminant (TAC) emissions, such as diesel exhaust and stationary source TAC emissions. However, the determination of localized pollutant concentrations requires project specific information that was not available at the SWFSP level and is not available at the zoning level for the proposed project. However, as discussed in the SWFSP EIR, the SWFSP would generally prohibit the development of large industrial-type land uses (e.g., manufacturing, warehousing, etc.), which is consistent with SWFSP Policy LU-8.1, which directs employment areas within the SWFSP Plan Area to be planned and zoned for non-industrial businesses. Additionally, this development of land uses that may result in stationary source emissions would be controlled by SJVAPCD through permitting and would be subject to further study and health risk assessment prior to the issuance of any necessary air quality permits under Regulation II. According to the SJVAPCD, Regulation II ensures that stationary source emissions

(permitted sources) would be reduced or mitigated below SJVAPCD significance thresholds of 10 in one million cancer risk and one for acute risk at the maximally exposed individual. Therefore, overall, impacts related to TACs were considered less than significant. The proposed zoning would be consistent with the existing uses within the project site. In addition, the proposed project does not include any physical changes to the project site, including construction or change in the current land uses. Furthermore, the proposed project would comply with the following Conditions of Zoning for the 11-parcel project site, described in detail in Attachment A of this Addendum: Pursuant to Conditions of Zoning B and C for the proposed project, any further development in the 11-parcel project site would prohibit land uses that generate high-level emissions of criteria air pollutants; Condition of Zoning E for the proposed project would require that any truck trips to or from the project site would only follow truck routes designated by the City of Fresno, included in the SWFSP, which avoid pathways adjacent to schools or that traverse through residential neighborhoods; finally, Condition of Zoning I requires all new industrial uses within the project site to acquire and maintain at all times any permits required for any stationary sources, and certificates from the CARB showing compliance with all applicable regulations governing trucks, including yard trucks, that enter onto the project site, including but not limited to the Truck and Bus Regulation, the Advanced Clean Trucks Regulation, and the Advanced Clean Fleets Regulation. As such the proposed project would not result in any new or more significant TAC impacts than were described in the SWFSP EIR.

Objectionable Odors

The SWFSP EIR identified that growth within the SWFSP Plan Area could generate new sources of odors; however, odors would be regulated under SJVAPCD Regulation IV, Prohibitions, Rule 4102, Nuisance. In addition, during construction activities, construction equipment exhaust and application of asphalt and architectural coatings would temporarily generate odors. Any construction-related odor emissions would be temporary and intermittent in nature. Therefore, impacts associated odors were considered to be less than significant.

The proposed zoning would be consistent with the existing uses within the project site. In addition, the proposed project does not include any physical changes to the project site, including construction or change in the current land uses. Furthermore, pursuant to Condition of Zoning G for the proposed project, included in Attachment A, which is meant to restrict future development in the 11-parcel project site, new uses that generate odors that are detectable offsite would not be permitted. During construction of development projects within the SWFSP Plan Area, the various diesel-powered vehicles and equipment in use on-site would create localized odors. These odors would be temporary and are not likely to be noticeable for extended periods of time beyond the project site. The potential for diesel odor impacts is, therefore, considered less than significant. No sources of objectionable odors have been identified in the vicinity of the project site. As with all projects within the City, proposals of a new odor source would require an applicant to demonstrate that the proposed facility includes odor controls within its design and through implementation of odor management practices to reduce odors to a less-than-significant level. As such, because the proposed project does not include any physical changes to the project site, and any future development within the project site would be restricted by project conditions of zoning, which prohibit the development of uses that would generate odors detectable offsite, the proposed project would not result in any new or more significant odor impacts than were described in the SWFSP EIR.

Applicable Mitigation

No substantial changes in environmental circumstances have occurred for this topic, nor revisions to the project, nor new information that could not have been known at the time the SWFSP EIR was certified leading to new or more severe significant impacts, and no new mitigation measures are required. The Mitigation Measures included in the SWFSP EIR related to Air Quality address potential impacts resulting from construction and would not apply to the proposed project.

Conclusion

The SWFSP EIR adequately evaluated the air quality impacts of the proposed project. Therefore, there would be no new impacts related to air quality associated with the proposed project and additional mitigation is not required.

4. BIOLOGICAL RESOURCES

	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New Impact
Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☐	☒
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

Discussion

Candidate, Sensitive, or Special-Status Species

The project site is located in an urbanized area and is currently developed with several existing light industrial buildings. Due to the urban location and lack of landscaping on the project site itself, the project site does not provide suitable habitat for special-status animal species. Common wildlife species that are adapted to urban environments are expected to continue to use the project site and vicinity after redevelopment. The project site is not occupied by, or suited for, any special-status species. However, as identified in the SWFSP EIR, implementation of Mitigation Measures BIO-1.1 through BIO-1.8 would be required to ensure potential impacts to species identified as a candidate, sensitive, or special-status species would be less than significant. With implementation of Mitigation Measures BIO-1.1 through BIO-1.8, the proposed project would not create direct or indirect adverse effects of special-status plants or wildlife more severe than impacts identified in the SWFSP EIR.

Riparian Habitat

The SWFSP EIR identified Mitigation Measure BIO-2.1 to ensure potential impacts to riparian habitat would be less than significant. However, the project site is entirely of developed and would not create direct or indirect adverse effects of loss of riparian habitat more severe than impacts identified in the SWFSP EIR.

State or Federally Protected Wetlands

As identified in the SWFSP EIR, there are several unnamed creeks or drainages in the SWFSP Plan Area (Figure 4.4-3 of the SWFSP EIR) that could be defined as federally protected wetlands and may be impacted by SWFSP activities and subject to the jurisdiction of the USACE under provisions of Section 404 of the Clean Water Act. However, none of the unnamed creeks or drainages are located within the project site. No aquatic resources occur within the project site, or within the vicinity of the project site. The project site consists entirely of existing developed areas. As such, the proposed project would not create direct or indirect adverse effects associated with State or federal protected wetlands more severe than impacts identified in the SWFSP EIR.

Interfere with Movement of Any Native Resident or Migratory Fish or Wildlife Species

The SWFSP EIR found that the SWFSP Plan Area provides little existing habitat value for native wildlife species in the agricultural, residential, industrial, and commercial land use areas, so land conversion as a result of the SWFSP would not be expected to substantially degrade the existing conditions for native resident or migratory fish or wildlife species, wildlife corridors, or nursery sites. In addition, the project site and the surrounding area is primarily developed and the proposed project would not interfere substantially with wildlife movement. As a result, no impact would occur.

Conflict with Local Policies

The proposed project would not conflict with any local policies or ordinances protecting biological resources. Though the proposed project is subject to provisions of the City's Municipal Code regarding trees on public property (Article 3 of Section 13 of the City of Fresno Municipal Code), the proposed project does not conflict with any of the existing ordinances. As a result, no impact would occur.

Conflict with and Adopted Habitat Conservation Plan or Natural Community Conservation Plan

The City of Fresno Planning Area is not located within the boundaries of any approved or draft Habitat Conservation Plan (HCP), Natural Community Conservation Plan (NCCP), or other adopted local, regional, or state HCP. Therefore, development within the Planning Area would not result in any impacts to an adopted HCP or NCCP.

The PG&E San Joaquin Valley Operation and Maintenance (O&M) Habitat Conservation Plan (HCP) was approved in 2007 and covers portions of nine counties, including Fresno County and the City of Fresno. This HCP covers PG&E activities which occur as a result of ongoing O&M that would have an adverse impact on any of the 65 covered species and provides incidental take coverage from the United State Fish and Wildlife Service (USFWS) and California Department of Fish and Wildlife

(CDFW). The project site is not located within the covered area of any other HCP, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

As identified in the SWFSP EIR, the SWFSP Plan Area is also located in the planning area of the Recovery Plan for Upland Species of the San Joaquin Valley, which addresses recovery needs and goals for the San Joaquin kit fox, among other species. Mitigation Measure BIO-1.1 through BIO-1.8 were identified in the SWFSP EIR to reduce potential project impacts to the San Joaquin kit fox and other wildlife covered by the Recovery Plan and their associated habitat, and require consultation with the USFWS if take of federally-listed species would occur. However, the proposed project would not be expected to conflict with the goals of the Recovery Plan, as the proposed project does not include any physical changes within the project site. As such, the proposed project would not create direct or indirect adverse effects more severe than impacts identified in the SWFSP EIR.

Applicable Mitigation

No substantial changes in environmental circumstances have occurred for this topic, nor revisions to the project, nor new information that could not have been known at the time the SWFSP EIR was certified leading to new or more severe significant impacts, and no new mitigation measures are required. The Mitigation Measures included in the SWFSP EIR related to biological resources address potential impacts resulting from construction and would not apply to the proposed project.

Conclusion

The SWFSP EIR adequately evaluated the biological resources impacts of the proposed project. Therefore, there would be no new impacts related to biological resources associated with the proposed project and additional mitigation is not required.

5. CULTURAL RESOURCES

	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New Impact
Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☐	☐	☐	☒
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☐	☐	☒
c. Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☐	☒

Discussion

Historic Resources

As described in the SWFSP EIR, several existing regulations would ensure that development and redevelopment activities associated with the SWFSP do not cause a substantial adverse change to a historic resource. The project site is not identified as a historical resource in the SWFSP EIR; however, the SWFSP found that development in accordance with the SWFSP and could result in potential impacts to unknown resources that are located below the ground surface. As discussed in the SWFSP EIR, there is a potential for buried historic deposits in the Southwest Fresno area. Therefore, the SWFSP EIR found that during grading and construction activities associated with future developments in accordance with the SWFSP, potential impacts to historic deposits could be significant. The SWFSP EIR identified that the implementation of MEIR Mitigation Measure CUL-1 would ensure that potential impacts to previously unidentified historic resources would remain at a less-than-significant level. As such, development associated with the SWFSP EIR would be required to implement MEIR Mitigation Measure CUL-1, as applicable, and identified in the SWFSP EIR, to address potential impacts to previously unidentified historic resources. However, as the proposed project does not include any physical changes within the project site, the proposed project would not be expected to result in impacts to historic resources. Therefore, the proposed project would not lead to new or more severe impacts to historic resources beyond those identified in the SWFSP EIR.

Archeological Resources

No archaeological resources have been identified on the project site. However, as noted in the SWFSP EIR, the region, and the SWFSP Plan Area itself, contains several geological features that would have been ideal for prehistoric temporary or seasonal encampments. As such, the SWFSP EIR found that it is possible that grading and construction activities may uncover previously unrecorded archaeological resources. Therefore, it is probable that future projects allowed under the SWFSP that occur where known cultural resources existing or require substantial excavation that could reach significant depths below the ground surface where no such excavation has previously occurred, could disturb unidentified subsurface materials that have the potential to contain prehistoric archaeological resources, including unrecorded Native American prehistoric archaeological sites. Therefore, the SWFSP identified impacts to unknown historical archeological

resources as significant. The SWFSP EIR identified that the implementation of MEIR Mitigation Measure CUL-2 would be required to ensure that potential impacts to previously unidentified archeological resources would remain at a less-than-significant level. As such, development associated with the SWFSP EIR would be required to implement MEIR Mitigation Measure CUL-2, as applicable, and identified in the SWFSP EIR, to address potential impacts to previously unidentified archeological resources. However, the proposed project does not include any physical changes within the project site. Therefore, the proposed project would not lead to new or more severe impacts to archaeological resources beyond those identified in the SWFSP EIR.

Disturbance of Human Remains

As discussed in the SWFSP EIR, no known buried resources, pre-historic resources, or ethnographic villages or camps have been reported within or near the SWFSP Plan Area. However, since the SWFSP Plan Area has not been surveyed, the potential exists that construction requiring substantial excavation, could result in the disturbance of unknown human remains. Since the SWFSP could require substantially greater excavation of the area that has previously occurred, unknown resources could be found within previously developed sites. The disturbance or destruction of human remains would result in a significant impact to cultural resources. The SWFSP EIR identified that the implementation of MEIR Mitigation Measure CUL-4 would ensure that potential impacts related to human remains would be less than significant. As such, development associated with the SWFSP EIR would be required to implement MEIR Mitigation Measure CUL-4, as applicable, and identified in the SWFSP EIR, to address potential impacts to previously unknown human remains. However, the proposed project does not include any physical changes within the project site. Therefore, the proposed project would not lead to new or more severe impacts to disturbance of human remains beyond those identified in the SWFSP EIR.

Applicable Mitigation

Development associated with the SWFSP EIR would be required to implement mitigation measures identified in the SWFSP EIR, including MEIR Mitigation Measures CUL-1, CUL-2, and CUL-4, as applicable, and identified in the SWFSP EIR, to address potential impacts to historic resources, archeological resources, and human remains. Otherwise, no substantial changes in environmental circumstances have occurred for this topic, nor revisions to the project, nor new information that could not have been known at the time the SWFSP EIR was certified leading to new or more severe significant impacts. Given that the proposed project would not include any physical changes within the project site, the Mitigation Measures included in the SWFSP EIR related to Cultural Resources to address potential impacts resulting from construction would not apply to the proposed project. No new mitigation measures are required.

Conclusion

The SWFSP EIR adequately evaluated the cultural resources impacts of the proposed project. Therefore, there would be no new impacts related to cultural resources associated with the proposed project and additional mitigation is not required.

6. ENERGY

	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New Impact
Would the project:				
a. Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation?	☐	☐	☐	☒
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☐	☒

Discussion

Consumption of Resources

As discussed in the SWFSP EIR, new development would result in a long-term increase in energy demand associated with the operation of lighting and space heating/cooling in the added building space, and vehicle travel. In addition, construction activities associated with development require the use of energy (e.g., electricity and fuel) for various purposes such as the operation of construction equipment and tools, as well as excavation, grading, demolition, and construction vehicle travel.

Construction-Period Energy Use. The SWFSP EIR determined that while construction activities require a commitment of energy sources, state and local efficiency standards improve energy security and innovation in clean energy technology and further the goal of conserving energy in the context of project development. As a result, construction impacts for future development under the SWFSP was considered a less-than-significant impact. The proposed zoning would be consistent with the existing uses within the project site. In addition, the proposed project does not include any physical changes to the project site, including construction or change in the current land uses. As such, implementation of the proposed project would not result in any new or more significant construction-period energy use impacts than were described in the SWFSP EIR.

Operational Energy Use. As discussed in the SWFSP EIR, proposed new development would be constructed using energy efficient modern building materials and construction practices, in accordance with California Green Building Standards Code (CALGreen), California Public Utilities Commission's (CPUC) Long Term Energy Efficiency Strategic Plan, and the Chapter 11 of the City's Municipal Code, which contain the Green Building Ordinance and Energy Code, respectively. The new buildings also would use new modern appliances and equipment, in accordance with the 2006 Appliance Efficiency Regulations (Title 20, CCR Sections 1601 through 1608). As discussed in the SWFSP EIR, under these requirements, future development under the SWFSP would use recycled construction materials, environmentally sustainable building materials, building designs that reduce the amount of energy used in building heating and cooling systems as compared to conventionally built structures, and landscaping that incorporates water efficient irrigation systems, all of which would conserve energy.

The SWFSP EIR found that with the implementation of SWFSP policies and compliance with the General Plan policies and CALGreen Building Code and the other applicable State and local energy efficiency measures, significant energy conservation and savings would be realized from future development under the SWFSP. In addition, the SWFSP EIR found that as an infill development, the SWFSP inherently furthers objectives of energy conservation related to transportation by focusing activities in areas of existing infrastructure and services. As with impacts of future development discussed above, implementation of SWFSP policies and compliance with General Plan policies would ensure energy impacts from transportation would be less than significant.

The project site is located in an urbanized area and is currently developed with several existing light industrial buildings. The proposed zoning would be consistent with the existing uses within the project site. In addition, the proposed project does not include any physical changes to the project site, including construction or change in the current land uses. Furthermore, the proposed project includes Conditions of Zoning for the proposed project, described in detail in Attachment A, which include restrictions and requirements for any further development or future new use to be constructed in the project parcels. Pursuant to Condition of Zoning K, any tenant improvements or other construction activities associated with new industrial uses would need to comply with California Green Building Standards. As such, the proposed project is not expected to substantially increase long-term operational energy usage at the project site compared to the SWFSP EIR. Therefore, the proposed project would not result in any new or more significant operational energy usage impacts than were described in the SWFSP EIR.

State and Local Plans

In 2002, the Legislature passed Senate Bill 1389, which required the California Energy Commission (CEC) to develop an integrated energy policy report for electricity, natural gas, and transportation fuels every two years. The plan calls for the State to assist in the transformation of the transportation system to improve air quality, reduce congestion, and increase the efficient use of fuel supplies with the lowest cost to the environment and energy sources. To further this policy, the plan identifies a number of strategies, including assistance to public agencies and fleet operators in implementing incentive programs for zero emission vehicles and associated infrastructure needs, and encouraging urban designs that reduce vehicle miles traveled (VMT) and accommodate pedestrian and bicycle access.

The most recently CEC adopted energy reports are the 2021 Integrated Energy Policy Report[5] and 2022 Integrated Energy Policy Report Update[6]. The Integrated Energy Policy Reports provide the results of the CEC's assessments of a variety of energy issues facing California. Many of these issues will require action if the State is to meet its climate, energy, air quality, and other environmental goals while maintaining energy reliability and controlling costs. The Integrated Energy Policy Reports cover a broad range of topics, including implementation of Senate Bill 350, integrated resource planning, distributed energy resources, transportation electrification, solutions to increase resiliency

[5] California Energy Commission. 2021. *2021 Integrated Energy Policy Report.* California Energy Commission. Docket # 21-IEPR-01.

[6] California Energy Commission. 2022. *2022 Integrated Energy Policy Report Update.* California Energy Commission. Docket # 22-IEPR-01.

in the electricity sector, energy efficiency, transportation electrification, barriers faced by disadvantaged communities, demand response, transmission and landscape-scale planning, the California Energy Demand Preliminary Forecast, the preliminary transportation energy demand forecast, renewable gas (in response to Senate Bill 1383), updates on Southern California electricity reliability, natural gas outlook, and climate adaptation and resiliency.

As indicated above, the project site is located in an urbanized area and is currently developed with several existing light industrial buildings. The proposed zoning would be consistent with the existing uses within the project site. In addition, the proposed project does not include any physical changes to the project site, including construction or change in the current land uses. As such, the proposed project is not expected to substantially increase construction-period or operational energy usage at the project site compared to the SWFSP EIR. Therefore, the proposed project would not conflict with California's energy conservation plans as described in the CEC's Integrated Energy Policy Reports. Therefore, the proposed project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency and this impact would be less than significant. Therefore, no new or substantially more severe impacts beyond those identified in the SWFSP would result from implementation of the proposed project.

Applicable Mitigation

No substantial changes in environmental circumstances have occurred for this topic, nor revisions to the project, nor new information that could not have been known at the time the SWFSP EIR was certified leading to new or more severe significant impacts, and no new mitigation would be required.

Conclusion

The SWFSP EIR adequately evaluated the energy impacts of the proposed project. Therefore, there would be no new impacts related to energy associated with the proposed project and additional mitigation is not required.

7. GEOLOGY AND SOILS

	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New Impact
Would the project:				
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☐	☒
ii. Strong seismic ground shaking?	☐	☐	☐	☒
iii. Seismic-related ground failure, including liquefaction?	☐	☐	☐	☒
iv. Landslides?	☐	☐	☐	☒
b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	☐	☒
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☐	☒
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☐	☒
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☐	☒

Discussion

Seismicity and Seismic Hazards

Fault Rupture. The proposed project would not subject people or structures to hazards from surface rupture of a known active fault. As identified in the SWFSP EIR, the closest known active fault to the SWFSP Plan Area is the Nunez Fault about 50 miles to the southwest; the nearest Alquist-Priolo Earthquake Fault Zone to the project site is along the Nunez Fault. No impact would occur due to the distance of the project site from the nearest known active fault.

Strong Seismic Ground Shaking. As discussed in the SWFSP EIR, ground shaking is likely to occur within the design lifetimes of buildings that would be constructed under the SWFSP. Developments built under the SWFSP would be designed and built conforming to California Building Code (CBC) seismic safety standards. In addition, the SWFSP EIR determined that geotechnical investigations would be required for certain categories of projects considered for approval under the SWFSP. Each geotechnical investigation would estimate seismic design based on site-specific geologic and soil conditions and the types of building occupancies proposed. With compliance with the CBC and seismic design parameters identified in project-specific geotechnical investigations, development within the SWFSP Plan Area would not create impacts related to strong seismic ground shaking

more severe than impacts identified in the SWFSP EIR. The proposed project does not include any physical changes to the project site, including construction or change in the current land uses. As such, implementation of the proposed project would not result in any new or more significant impacts related to strong seismic ground shaking than those described in the SWFSP EIR.

Seismic-Related Ground Failure and Liquefaction. The potential for different types of ground failure to occur during a seismic event is discussed below.

Liquefaction. Buildings constructed under the SWFSP could be subject to liquefaction. Geotechnical investigations would be required for certain categories of projects approved under the SWFSP. Each geotechnical investigation would assess liquefaction potential and would provide needed recommendations, such as foundation design, to minimize hazards arising from liquefaction. With compliance with seismic design parameters identified in project-specific geotechnical investigations, development within the SWFSP Plan Area would not create impacts related to liquefaction more severe than impacts identified in the SWFSP EIR. The proposed project does not include any physical changes to the project site, including construction or change in the current land uses. As such, implementation of the proposed project would not result in any new or more significant impacts related to liquefaction than those described in the SWFSP EIR.

Seismic Ground Settlement. Seismic settlement is not considered a significant hazard in the Fresno region due to the nature of the underlying soils and the history of low to moderate ground shaking. Geotechnical investigations for projects developed under the SWFSP would assess the potential for soil settlement—including seismic settlement—on the affected project sites, and provide needed recommendations to minimize hazards arising from such settlement. With compliance with seismic design parameters identified in project-specific geotechnical investigations, development within the SWFSP Plan Area would not create impacts related to seismic ground settlement more severe than impacts identified in the SWFSP EIR. The proposed project does not include any physical changes to the project site, including construction or change in the current land uses. As such, implementation of the proposed project would not result in any new or more significant impacts related to seismic ground settlement than those described in the SWFSP EIR.

Lateral Spreading. Lateral spreading is not considered a substantial hazard in the Fresno region for the same reasons pertaining to seismic ground settlement. Geotechnical investigations for projects considered for approval under the SWFSP would include site-specific assessments of the potential for seismic ground failure, and would provide needed recommendations—such as for remedial grading and/or foundation design—to minimize any ensuing hazards. With compliance with seismic design parameters identified in project-specific geotechnical investigations, development within the SWFSP Plan Area would not create impacts related to lateral spreading more severe than impacts identified in the SWFSP EIR. The proposed project does not include any physical changes to the project site, including construction or change in the current land uses. As such, implementation of the proposed project would not result in any new or more significant impacts related to lateral spreading than those described in the SWFSP EIR.

Landslides. The proposed project would not create impacts related to landslides more severe than impacts identified in the SWFSP EIR.

Erosion/Loss of Top Soil

The proposed project does not include any physical changes to the project site, including construction or change in the current land uses.

Construction projects of 1 acre or more would be required to comply with the General Construction Permit, Order No. 2012-0006-DWQ, issued by the State Water Resources Control Board (SWRCB) in 2012. Projects obtain coverage by developing and implementing a Storm Water Pollution Prevention Plan (SWPPP) estimating sediment risk from construction activities to receiving waters, and specifying Best Management Practices (BMPs) that would be used to minimize pollution of stormwater. With implementation of BMPs, development within the SWFSP Plan Area would not create impacts related to erosion/loss of top soil more severe than impacts identified in the SWFSP EIR.

Unstable and Expansive Soils

Geotechnical investigations for projects considered for approval under the SWFSP would include site-specific assessments of the potential for unstable and expansive soils, and would provide needed recommendations—such as for remedial grading and/or foundation design—to minimize any ensuing hazards. With compliance with seismic design parameters identified in project-specific geotechnical investigations, development within the SWFSP Plan Area would not create impacts related to unstable and expansive soils more severe than impacts identified in the SWFSP EIR. The proposed project does not include any physical changes to the project site, including construction or change in the current land uses. As such, implementation of the proposed project would not result in any new or more significant impacts related to unstable and expansive soils than those described in the SWFSP EIR.

Septic Tanks/Wastewater Disposal

Development of the proposed project would not involve the use of septic tanks or alternative wastewater disposal systems. Therefore, the proposed project would have no impact related to septic tanks or alternative waste water disposal systems.

Paleontological Resources

As discussed in the SWFSP EIR, based on a review of geologic maps of the SWFSP Plan Area, there are two primary surficial deposits: 1) Pleistocene non-marine and 2) Quaternary non-marine fan deposits. The Pleistocene non-marine deposits are considered to have a high potential sensitivity. The Quaternary non-marine deposits consist of Pleistocene-Holocene alluvial sediments. Since these deposits include Pleistocene sediments, they are also considered to have a high potential for sensitivity. Therefore, excavation and/or construction activities within the SWFSP Plan Area have the potential to impact paleontological/geological resources during excavation and construction activities within previously undisturbed soils. The potential for the development within the SWFSP to impact paleontological/geological resources is considered significant, and as such, the SWFSP EIR identified that the implementation of MEIR Mitigation Measure CUL-3 would be required to ensure

that potential impacts to paleontological and geological resources would be less than significant. As such, development associated with the SWFSP EIR would be required to implement MEIR Mitigation Measure CUL-3, as applicable, and identified in the SWFSP EIR, to address potential impacts to previously unidentified paleontological and geological resources. However, the proposed project does not include any physical changes to the project site, including construction or change in the current land uses. As a result, the proposed project would not result in new or more severe impacts related to paleontological resources beyond those analyzed in the SWFSP EIR.

Applicable Mitigation

Development associated with the SWFSP EIR would be required to implement MEIR Mitigation Measure CUL-3, as applicable, and identified in the SWFSP EIR, to address potential impacts to paleontological and geological resources. Otherwise, no substantial changes in environmental circumstances have occurred for this topic, nor revisions to the project, nor new information that could not have been known at the time the SWFSP EIR was certified leading to new or more severe significant impacts. Given that the proposed project would not include any physical changes within the project site, the Mitigation Measures included in the SWFSP EIR related to paleontological and geological resources to address potential impacts resulting from construction would not apply to the proposed project. No new mitigation measures are required.

Conclusion

The SWFSP EIR adequately evaluated the geology and soils impacts of the proposed project. Therefore, there would be no new impacts related to geology and soils associated with the proposed project and additional mitigation is not required.

8. GREENHOUSE GAS EMISSIONS

	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New Impact
Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☐	☒
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☐	☒

Discussion

Greenhouse gases (GHGs) are present in the atmosphere naturally, are released by natural sources, or are formed from secondary reactions taking place in the atmosphere. The gases that are widely seen as the principal contributors to human-induced global climate change are:

- Carbon dioxide (CO_2);
- Methane (CH_4);
- Nitrous oxide (N_2O);
- Hydrofluorocarbons (HFCs);
- Perfluorocarbons (PFCs); and
- Sulfur Hexafluoride (SF_6).

Over the last 200 years, humans have caused substantial quantities of GHGs to be released into the atmosphere. These extra emissions are increasing GHG concentrations in the atmosphere and enhancing the natural greenhouse effect, believed to be causing global warming. While manmade GHGs include naturally-occurring GHGs such as CO_2, methane, and N_2O, some gases, like HFCs, PFCs, and SF_6 are completely new to the atmosphere.

Certain gases, such as water vapor, are short-lived in the atmosphere. Others remain in the atmosphere for significant periods of time, contributing to climate change in the long term. Water vapor is excluded from the list of GHGs above because it is short-lived in the atmosphere and its atmospheric concentrations are largely determined by natural processes, such as oceanic evaporation.

These gases vary considerably in terms of Global Warming Potential (GWP), a concept developed to compare the ability of each GHG to trap heat in the atmosphere relative to another gas. The GWP is based on several factors, including the relative effectiveness of a gas to absorb infrared radiation and length of time that the gas remains in the atmosphere ("atmospheric lifetime"). The GWP of each gas is measured relative to CO_2, the most abundant GHG. The definition of GWP for a particular

GHG is the ratio of heat trapped by one unit mass of the GHG to the ratio of heat trapped by one unit mass of CO_2 over a specified time period. GHG emissions are typically measured in terms of pounds or tons of "CO_2 equivalents" (CO_2e).

Generation of Greenhouse Gas Emissions

As discussed in the SWFSP EIR, the planned improvements, design guidelines, objectives, and policies under the SWFSP would generally support a sustainable development pattern for the SWFSP Plan Area by creating more complete neighborhoods and improving transit options. However, the SWFSP EIR also found that the increase in overall land use intensity and associated population and employment growth within the SWFSP Plan Area are the primary factors for the increase in GHG emissions. In addition, although applicable future individual development projects would be processed under their own separate CEQA evaluation which may result in a less-than-significant GHG emissions impact, cumulatively, development of projects accommodated by the SWFSP would generate substantial GHG emissions. Therefore, the SWFSP EIR found the SWFSP's cumulative contribution to the long-term GHG emissions in the State to be significant and unavoidable.

The project site is located in an urbanized area and is currently developed with several existing light industrial buildings. The proposed zoning would be consistent with the existing uses within the project site. In addition, the proposed project does not include any physical changes to the project site, including construction or change in the current land uses. As a result, the proposed project would not result in new or more severe impacts related to GHG emissions beyond those analyzed in the SWFSP EIR.

Consistency with Greenhouse Gas Reduction Plans

The SWFSP EIR included an evaluation of the 2017 CARB Scoping Plan[7], Fresno COG's Regional Transportation Plan/Sustainable Communities Strategy, and the City of Fresno's 2014 GHG Reduction Plan[8]. It was determined that the SWFSP would be consistent with the strategies listed in these plans. No SWFSP policies were identified that conflict with or obstruct any of the plans' strategies. The SWFSP EIR considered this impact less than significant. The proposed zoning would be consistent with the existing uses within the project site, and the proposed project does not include any physical changes to the project site, including construction or change in the current land uses. The proposed project would be required to be consistent with the policies listed in the SWFSP and therefore would be consistent with the strategies listed in the CARB Scoping Plan, Fresno COG's Regional Transportation Plan/Sustainable Communities Strategy, and the City of Fresno's GHG Reduction Plan.

Since the SWFSP EIR was certified, the 2022 Scoping Plan Update[9] was released by CARB. The 2022 Scoping Plan Update assesses progress toward the statutory 2030 target and is designed to meet the State's long-term climate objectives. The Scoping Plan update focuses on outcomes needed to

[7] California Air Resources Board. 2017. The 2017 Climate Change Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target. https://www.arb.ca.gov/ccscopingplan2030sp_pp_final.pdf
[8] City of Fresno. 2014. Draft Fresno General Plan Update Greenhouse Gas Reduction Plan. July.
[9] California Air Resources Board. 2022. 2022 Scoping Plan for Achieving Carbon Neutrality. December.

achieve carbon neutrality by assessing paths for clean technology, energy efficiency, natural working lands, and other objectives.

Energy efficient measures included in the Scoping Plan are intended to maximize energy efficiency building and appliance standards, pursue additional efficiency efforts including new technologies and new policy and implementation mechanisms, and pursue comparable investment in energy efficiency from all retail providers of electricity in California. In addition, these measures are designed to expand the use of green building practices to reduce the carbon footprint of California's new and existing inventory of buildings. The proposed zoning would be consistent with the existing uses within the project site and does not include any physical changes to the project site, including construction or change in the current land uses or buildings. Any electricity currently provided to the project site would be required to be consistent with the retail electricity requirements included in the Scoping Plan. In addition, any future changes to the existing buildings on the project site would be required to comply with the latest Title 24 standards of the California Code of Regulations (CCR), established by the California Energy Commission (CEC), regarding energy conservation and green building standards. Therefore, the proposed project would comply with applicable energy measures.

Water conservation and efficiency measures included in the Scoping Plan are intended to continue efficiency programs and use cleaner energy sources to move and treat water. Increasing the efficiency of water transport and reducing water use would reduce GHG emissions. As noted above, the proposed project does not include any physical changes to the project site. As such, the proposed project would not conflict with any of the water conservation and efficiency measures.

The transportation and motor vehicle sector goals in the Scoping Plan include strategies to increase zero emission vehicle sales, develop a robust network of charging stations, and increase the stringency and scope of the Low Carbon Fuel Standard. Specific regional emission targets for transportation emissions would not directly apply to the proposed project. However, vehicles traveling to the project site would be required to comply with the Advanced Clean Cars Program and any other applicable regulations governing trucks, including yard trucks, that enter onto the project site, including but not limited to the Truck and Bus Regulation, the Advanced Clean Trucks Regulation, and the Advanced Clean Fleets Regulation. Therefore, the proposed project would not conflict with the identified transportation and motor vehicle measures.

As noted in the Project Description, the proposed project site is located in an urbanized area and is currently developed with several existing light industrial buildings. The proposed zoning would be consistent with the existing uses within the project site. In addition, the proposed project does not include any physical changes to the project site, including construction or change in the current land uses. As a result, other measures included in the Scoping Plan, such as those related to natural working lands, are not applicable to the proposed project. Therefore, the proposed project would not conflict with the 2022 Scoping Plan.

Additionally, the proposed project would be subject to all applicable permit and planning requirements in place or adopted by the City of Fresno. Pursuant to Condition of Zoning I for the proposed project, which includes requirements for future development in the 11-parcel project site, all new industrial uses in the project parcels would need to acquire and maintain at all times any permits required for any stationary sources, and certificates from the CARB showing compliance

with all applicable regulations governing trucks, including yard trucks, that enter onto the project site as noted above. Therefore, although a new Scoping Plan has been released since the preparation of the SWFSP EIR, the proposed project would be consistent with the 2022 Scoping Plan and other plans and policies adopted for the purpose of reducing GHG emissions. Therefore, the proposed project would not create impacts related to consistency with GHG reduction plans more severe than impacts identified in the SWFSP EIR.

Applicable Mitigation

No substantial changes in environmental circumstances have occurred for this topic, nor revisions to the project, nor new information that could not have been known at the time the SWFSP EIR was certified leading to new or more severe significant impacts, and no new mitigation measures are required.

Conclusion

The SWFSP EIR adequately evaluated the GHG impacts of the proposed project. Therefore, there would be no new impacts related to GHG associated with the proposed project and additional mitigation is not required.

9. HAZARDS AND HAZARDOUS MATERIALS

	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New Impact
Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☐	☒
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☐	☒
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒

Discussion

Transport, Use, Storage, and Disposal of Hazardous Materials

Hazardous waste generators in the SWFSP Plan Area include industries, businesses, public and private institutions, and households. Federal, State, and local agencies maintain comprehensive databases that identify the location of facilities using large quantities of hazardous materials, as well as facilities generating hazardous waste. Some of these facilities use certain classes of hazardous materials that require risk management plans to protect surrounding land uses. In addition, the SWFSP EIR identifies properties within the SWFSP Plan Area that have residual soil, and in some cases groundwater, contamination that may require remediation; however, the project site is not identified as a site requiring remediation.

The proposed project consists of rezoning 11 parcels located in the SWFSP Plan Area from Neighborhood Mixed Use (NMX) to the prior designation of Industrial - Light (IL). The proposed project does not include any physical changes to the project site, including construction or change in the current land uses. Implementation of the proposed project would result in the continued use and storage of hazardous materials, including common cleaning products, building maintenance

products, paints and solvents, and other similar items. However, routinely used hazardous materials would not be of the type or occur in sufficient quantities to pose a significant hazard to public health and safety or to the environment.

In addition, potentially hazardous building materials (e.g., asbestos containing materials, lead-based paint) could be encountered during demolition of existing structures to accommodate new development within the SWFSP Plan Area. Therefore, the transport of hazardous materials could occur during future operational, remediation and construction activities within the SWFSP Plan Area. The SWFSP identifies new truck routes away from existing and planned residential neighborhoods and it prohibits new industrial uses from being developed or located within the SWFSP Plan Area. In addition, to reduce potential project-specific impacts regarding routine transport, use, or disposal of hazardous materials in the City of Fresno, including the SWFSP Plan Area, the General Plan includes policies that would ensure hazardous impacts associated with the routine transport, use, or disposal of hazardous materials are less than significant.

Any future development or use constructed in the 11- parcel project site would be subject to the Conditions of Zoning included in Attachment A of this Addendum, which include requirements and restrictions for future uses. Pursuant to Condition of Zoning A for the proposed project, the following uses would only be allowed in the project parcels subject to issuance of a Conditional Use Permit from the City of Fresno: chemical research and development facilities; chemical and mineral storage, other than incidental storage that comprises less than 5% of the premises; and any new industrial use in the IL zone district that is permitted or permitted conditionally, and that would (i) result in the construction of a new structure of more than 1,000 square feet; (ii) result in the expansion of any existing structure by more than 5% compared to the gross floor area existing as of the date upon which the underlying property was rezoned to the Base District; or (iii) require permitting under Title V of the Clean Air Act. Additionally, Conditions of Zoning B and C for the proposed project, prohibit the development of uses that utilize or generate large quantities of hazardous materials, such as intensive industrial uses, concrete batch plants, mining and quarrying uses, and heavy manufacturing uses, in the project site. Furthermore, pursuant to Condition of Zoning E identified in Attachment A to this Addendum, any truck trips to or from the project site shall only follow truck routes designated by the City of Fresno, as identified in the SWFSP, which avoid pathways adjacent to schools or that traverse through residential neighborhoods. Additionally, the proposed project would also be required to be consistent with the applicable General Plan Policies related to hazardous materials and would not create impacts related to hazardous materials more severe than impacts identified in the SWFSP EIR.

Release of Hazardous Materials and Risk of Upset

As identified above, implementation of the proposed project would result in the continued use and storage of hazardous materials, including common cleaning products, building maintenance products, paints and solvents, and other similar items. Routinely used hazardous materials, however, would not be of the type or occur in sufficient quantities to pose a significant hazard to public health and safety or to the environment. Additionally, as described above, pursuant to project Conditions of Zoning A, B, and C, the development of future uses that that would utilize or generate large quantities of hazardous materials would be mainly prohibited in the 11-parcel project site, with only certain uses allowed subject to a Conditional Use Permit from the City.

As discussed in the SWFSP EIR, the City of Fresno Fire Department (FFD) recognizes the potential for a large chemical release to occur anywhere in the City, which could expose thousands of people to hazardous materials via air, soil, or water media. Similarly, a variety of chemicals would continue to be transported via the highways, surface streets, and airport, which serve the Plan Area. The FFD Hazardous Materials Response Team has embraced an all-hazards approach to SWFSP emergency response to ensure that the community receives a robust, competent level of service to all hazardous materials events. Pursuant to Condition of Zoning L identified in Attachment A to this Addendum, all industrial uses in the project site are required to comply with the California Accidental Release Prevention (CalARP) program, and would not allow any substance regulated under the CalARP program or other hazardous substance to migrate offsite. Furthermore, pursuant to Condition of Zoning M, in the event that any contamination is discovered on a property within the project site, the landowner shall cooperate in good faith and with reasonable diligence with the investigation and remediation of the property by the governmental entity or entities overseeing such investigation and remediation. In addition, the proposed project must comply with City of Fresno regulations/laws regarding hazardous materials as well as State and federal laws regarding hazardous materials, as outlined above in the SWFSP EIR.

The SWFSP identifies new truck routes away from existing and planned residential neighborhoods and it prohibits new industrial uses from being developed or located within the SWFSP Plan Area. Pursuant to Condition of Zoning E identified in Attachment A to this Addendum, any truck trips to or from the project site shall only follow truck routes designated by the City of Fresno, as identified in the SWFSP. In addition, to reduce potential project-specific impacts regarding routine transport, use, or disposal of hazardous materials in the City of Fresno, including the SWFSP Plan Area, the General Plan includes policies that would ensure hazardous impacts related to the creation of a possible hazard to the public or environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment are less than significant. The proposed project would also be required to be consistent with the applicable General Plan Policies related to hazardous materials and would not create impacts related to hazardous materials more severe than impacts identified in the SWFSP EIR.

Emissions of Hazardous Waste within 0.25 miles of a School

West Fresno Middle School, located at 2888 Ivy Avenue, and West Fresno Elementary School, located at 2910 Ivy Avenue, are approximately 0.14 miles west of the project site. No other schools were identified within a quarter-mile of the project site. As discussed above, continued operation of land uses within the project site could involve the routine transport, use, and disposal of hazardous or potentially hazardous materials to, from, and on development sites; however, the SWFSP identifies new truck routes away from existing and planned residential neighborhoods, and pursuant to Condition of Zoning E identified in Attachment A to this Addendum, trucks travelling to and from the project site would be required to use these designated routes. In addition, potentially hazardous building materials (e.g., asbestos containing materials, lead-based paint) could be encountered during demolition of existing structures to accommodate new development within the SWFSP Plan Area. Therefore, releases of hazardous materials associated with future development of the SWFSP could occur during future construction and operational activities. However, hazardous chemicals and materials that would be used within the project site would be subject to existing government regulations.

In addition, the SWFSP EIR identifies properties within the SWFSP Plan Area that have residual soil, and in some cases groundwater contamination that may require remediation; however, the project site is not identified as a site requiring remediation. Therefore, releases of hazardous materials associated with future remediation activities within the project site are not expected.

The potential for a hazardous materials releases during construction and operation activities within the SWFSP Plan Area would be less than significant following required compliance with existing regulations and implementation of Mitigation Measures HAZ-4a through HAZ-4h from the SWFSP EIR. However, the proposed project does not include any physical changes to the project site, including construction or change in the current land uses. As a result, the proposed project would not result in new or more severe impacts to existing or proposed school facilities from the emission of hazardous materials and would not create impacts more severe than impacts identified in the SWFSP EIR.

Hazardous Materials Site Pursuant to Government Code Section 65962.5

The project site is not included on a list of hazardous materials release sites compiled pursuant to Government Code Section 65962.5. Implementation of Mitigation Measures HAZ-4a through HAZ-4h from the SWFSP EIR would reduce potential impacts involving the possible past release of hazardous materials within the SWFSP Plan Area to the subsurface to a less-than-significant level. In addition, the proposed project does not include any physical changes to the project site, including construction or change in the current land uses. As a result, the proposed project would not result in new or more severe impacts related hazardous materials release sites beyond those analyzed in the SWFSP EIR.

Aviation Hazards

The project site is located approximately 2.4 miles southwest of the Fresno-Chandler Executive Airport. At this distance, potential aviation hazards associated with the proposed project would be considered less than significant. Furthermore, the project site is not located in a compatibility zone for the Fresno-Chandler Executive Airport outlined in the Fresno County Airport Land Use Compatibility Plan[10]. Therefore, the proposed project would not create impacts related to aviation hazards more severe than impacts identified in the SWFSP EIR.

Emergency Response or Evacuation Plan

The proposed project would not impair implementation of, or interfere with, emergency response or evacuation plans because the proposed project would not alter the existing streets surrounding the project site which could be used for emergency access or evacuation. The proposed project would continue to involve limited short term use of City streets for delivery of equipment and supplies, and commuting workers. Potential impacts to emergency evacuation routes or emergency response plans resulting from the proposed project are therefore considered less than significant. The proposed project would not create impacts more severe than impacts identified in the SWFSP EIR.

[10] Fresno Council of Governments, 2018. Fresno County Airport Land Use Compatibility Plan. December.

Wildfire

The project site is located in a primarily developed urban area and is not located adjacent to wildland areas, and therefore the proposed project is not expected to expose people or structures to a significant risk of loss, injury, or death involving wildland fires. The proposed project would not create impacts more severe than impacts identified in the SWFSP EIR.

Applicable Mitigation

No substantial changes in environmental circumstances have occurred for this topic, nor revisions to the project, nor new information that could not have been known at the time the SWFSP EIR was certified leading to new or more severe significant impacts, and no new mitigation measures are required. The Mitigation Measures included in the SWFSP EIR related to hazards and hazardous materials address potential impacts resulting from construction and would not apply to the proposed project.

Conclusion

The SWFSP EIR adequately evaluated the hazards and hazardous materials impacts of the proposed project. Therefore, there would be no new impacts related to hazards and hazardous materials associated with the proposed project and additional mitigation is not required.

10. HYDROLOGY AND WATER QUALITY

	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New Impact
Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	☐	☐	☐	☒
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☐	☒
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:	☐	☐	☐	☒
i. Result in substantial erosion or siltation on- or off-site;	☐	☐	☐	☒
ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	☐	☐	☐	☒
iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☐	☒
iv. Impede or redirect flood flows?	☐	☐	☐	☒
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☐	☒

Discussion

Water Quality Standards

Construction. The proposed project consists of rezoning 11 parcels located in the SWFSP Plan Area from Neighborhood Mixed Use (NMX) to the prior designation of Industrial - Light (IL). The proposed project does not include any physical changes to the project site, including construction or change in the current land uses.

Contaminants that can be released by construction projects and can contaminate stormwater include sediment, nutrients, bacteria and viruses, oil and grease, metals, organic (carbon-based) compounds, oxygen-demanding substances, pesticides, and trash and debris. Organic compounds are found in pesticides, solvents, and hydrocarbons. Oxygen-demanding substances include proteins, carbohydrates, and fats; microbial degradation of such substances increases oxygen demand in water.

Construction projects of 1 acre or more would be required to comply with the General Construction Permit, Order No. 2012-0006-DWQ, issued by the SWRCB. Projects obtain coverage by developing and implementing a SWPPP estimating sediment risk from construction activities to receiving

waters, and specifying BMPs that would be used to minimize pollution of stormwater. With implementation of BMPs, construction-related impacts would be less than significant. However, the proposed project does not include any physical changes to the project site, including construction or change in the current land uses. As a result, the proposed project would not result in new or more severe impacts related to construction water quality impacts than were described in the SWFSP EIR.

Operation. The project site is served by Fresno Metropolitan Flood Control District (FMFCD) retention basins. Water quality treatment for post-construction discharges to stormwater in the FMFCD urban flood control system area is provided by retention basins. Land development in the FMFCD Master Plan area is exempt from further water quality requirements provided that the FMFCDs Storm Water Quality Management Plan is implemented.

Storm drainage improvements are funded by local drainage fees paid by developments and are built by the FMFCD, by developers, or both. Basins are highly effective at reducing average concentrations of a broad range of contaminants, including several polyaromatic hydrocarbons, total suspended solids, and most metals. Pollutants are removed by filtration through soil, and thus don't reach the groundwater aquifer. Basins are built to design criteria exceeding Statewide Standard Urban Stormwater Mitigation Plan standards. The urban flood control system provides treatment for all types of development. As such, operational impacts would be less than significant. Therefore, the proposed project would not result in any new or more significant operational water quality impacts than were described in the SWFSP EIR.

Deplete Groundwater Supplies

As identified in the SWFSP EIR, water demand associated with the SWFSP would be within the estimated Citywide water surplus in the two dry-condition scenarios analyzed during the 2020-2040 period. The proposed project does not include any physical changes to the project site, including construction or change in the current land uses; and therefore, would not substantially increase water demands in the City, thus increasing demands for groundwater. Therefore, impacts on groundwater supplies would be less than significant.

Runoff from the project site would continue to be directed to retention basins where it would infiltrate into soil. As discussed in the SWFSP EIR, retention basins have capacity for a two-year storm and for at least 60 percent of average annual rainfall. The SWFSP EIR determined that no construction of new or expanded basins would be required to accommodate runoff from buildout. The proposed project would not substantially interfere with groundwater recharge because the proposed project does not include any physical changes to the project site, including construction or change in the current land uses. Additionally, pursuant to Condition of Zoning I, future development in the project site would be required to tie-in to the City's municipal water system, and the use of private groundwater wells as sources of water supply would not be permitted. Therefore, impacts on groundwater recharge would be less than significant and would not be more significant than impacts identified in the SWFSP EIR.

Drainage Pattern

The proposed project does not include any physical changes to the project site, including construction or change in the current land uses. The drainage pattern of the project site would

remain similar to current conditions with implementation of the proposed project. Runoff from developed properties would be conveyed in curb and gutter to storm drain inlets, and then through storm drains to FMFCD retention basins where the runoff would be infiltrated into soil. In addition, the proposed project would remain developed with land uses consisting of buildings, paved areas, and landscaping. As such, potential erosion and siltation on-site would be similar to current conditions. As such, potential impacts of the proposed project related to changes in drainage patterns and erosion and siltation would be less than significant. Therefore, the proposed project would not result in any new or more significant drainage pattern impacts than were described in the SWFSP EIR.

Flooding and Dam Failure Inundation

The project site is not located within a 100-year flood hazard zone or an area protected from flooding by levees, as mapped by the Federal Emergency Management Agency (FEMA).[11] The project site is also not located within a dam failure inundation area. Therefore, the proposed project would result in less-than-significant impacts related to flooding and would not result in any new or more significant impacts than were described in the SWFSP EIR.

Inundation by Seiche, Tsunami, or Mudflow

The project site is not located near enclosed or partially enclosed bodies of water; therefore, impacts associated with seiches would not occur. Based on the distance of the project site to Pacific Ocean, coastal hazards such as tsunamis would not affect the project site. The project site and surrounding topography is flat and therefore the proposed project would not result in impacts related to mudflows (a type of landslide that occurs on slopes). Therefore, the proposed project would not result in impacts related to inundation by tsunami, seiche, or mudflow that are more significant than were described in the SWFSP EIR.

Conflict with or Obstruct Implementation of a Water Quality Control Plan or Sustainable Groundwater Management Plan

As discussed above, due to the size of the proposed project and because the proposed project would not include any physical changes, the proposed project would not result in significant impacts to groundwater supplies or recharge. Furthermore, according to a water usage analysis prepared for the SWFSP, NMX land uses for the SWFSP area have an anticipated water usage of 0.409 million gallons per day (MGPD), while existing IL land uses have an anticipated water usage of 0.195 MGPD. As such, existing Light Industrial land uses in the project site would have a lower water usage than any hypothetical NMX land uses. Additionally, pursuant to Condition of Zoning I, future development in the project site would be required to tie-in to the City's municipal water system, and the use of private groundwater wells as sources of water supply would not be permitted. As a result, a less-than-significant impact would occur. Therefore, the proposed project would not result in any new or more significant impacts than were described in the SWFSP EIR.

[11] Federal Emergency Management Agency. 2009. Flood Insurance Rate Map, Map Number 06019C2110H, effective February 18.

Applicable Mitigation

No substantial changes in environmental circumstances have occurred for this topic, nor revisions to the project, nor new information that could not have been known at the time the SWFSP EIR was certified leading to new or more severe significant impacts, and no new mitigation measures are required.

Conclusion

The SWFSP EIR adequately evaluated the hydrology and water quality impacts of the proposed project. Therefore, there would be no new impacts related to hydrology and water quality associated with the proposed project and additional mitigation is not required.

11. LAND USE AND PLANNING

	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New Impact
Would the project:				
a. Physically divide an established community?	☐	☐	☐	☒
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	☒

Discussion

Divide an Established Community

Projects that have the potential to physically divide an established community include projects such as new freeways and highways, major arterials, streets, and railroad lines. The proposed project consists of rezoning 11 parcels located in the SWFSP Plan Area from Neighborhood Mixed Use (NMX) to the prior designation of Industrial - Light (IL). The proposed project does not include any physical changes to the project site, including construction or change in the current land uses. The proposed project would not remove any public access, including pedestrian and bicycle access. The proposed project would not result in a barrier within the project site that would impede access, nor would it result in a removal of a major means of access. Therefore, the proposed project would not inhibit public connectivity, and would not physically divide an established community. Therefore, this impact would not result in new or more significant impacts beyond those analyzed in the SWFSP EIR.

Conformance with Land Use Plans

As discussed above, the proposed project consists of rezoning 11 parcels located in the SWFSP Plan Area from Neighborhood Mixed Use (NMX) to the prior designation of Industrial - Light (IL). The IL zoning district is intended to provide a diverse range of light industrial uses, including limited manufacturing and processing, research and development, fabrication, utility equipment and service yards, wholesaling, warehousing, and distribution activities. Small-scale retail and ancillary office uses are also permitted. Light industrial areas may serve as buffers between Heavy Industrial zoning districts and other land uses and otherwise are generally located in areas with good transportation access, such as along railroads and freeways. The proposed zoning would be consistent with the existing uses within the project site. Additionally, existing light industrial uses on the project site are also compatible with surrounding land uses, which include light industrial to the west, light industrial uses to the north, SR 41 and heavy industrial uses to the east, and a pallet yard, a vacant property, and a ponding basin to the south.

In addition to the proposed zoning change, the proposed project would also include land use amendments to the SWFSP and General Plan in order for the land use designations to be consistent with the proposed zoning and an amendment to the following policy of the SWFSP:

LU-8.1 Plan and zone employment areas in Southwest Fresno for nonindustrial businesses. All previously designated Light Industrial, Heavy Industrial, Business Park, and Regional Business Park land uses should be planned and zoned Office, except for the area bounded by Vine Avenue on the north, State Route 41 on the east, Elm Avenue on the west, and ~~Annadale Avenue~~East Chester/Samson Avenue alignment on the south, in order to allow the continuation of legally established ~~and non-polluting uses established and~~uses operating as of February 18, 2021.

The proposed project does not include any physical changes to the project site, including construction or change in the current land uses.

Additionally, in order to address concerns raised by the community regarding the proposed rezone of the 11 parcels, the proposed project would also include conditions to the zoning that will restrict future uses in the project site. Any further development on the 11 parcels would be conditioned upon the following conditions of zoning:

A. Notwithstanding any contrary provisions in the City Code, the following uses shall be subject to a Conditional Use Permit regardless of any future changes in the City Code:

    1. Research and development, chemical

    2. Chemical and Mineral Storage, other than incidental storage that comprises less than 5% of the premises, subject to demonstration to the City that the use fully complies with the California Accidental Release Prevention (CalARP) program.

    3. Any new industrial use in the IL zone district that is permitted or permitted conditionally, and that would (i) result in the construction of a new structure of more than 1,000 square feet; (ii) result in the expansion of any existing structure by more than 5% compared to the gross floor area existing as of the date upon which the underlying property was rezoned to the Base District; or (iii) require permitting under Title V of the Clean Air Act.

B. Notwithstanding any contrary provisions in the City Code, the following land uses shall not be permitted:

    1. Emergency Shelter

    2. Hospital

    3. Parking, Public or Private

    4. Adult-Oriented Business

    5. Kennels

    6. Large Vehicle and Equipment Sales, Services and Rental

7. Motorcycle/Riding Club
8. Airports and Heliports
9. Utilities, Major
10. Crop Cultivation
11. Concrete Batch Plants
12. Shooting/Archery Range
13. Swap Meet / Flea Market
14. Towing and Impound
15. Rubber products manufacturing
16. Nonmetallic mineral product manufacturing
17. Primary metal manufacturing
18. Fabricated metal product manufacturing
19. Automotive and heavy equipment manufacturing
20. CRV Recycling Center
21. Recycling Processing Facility
22. Waste Transfer Facility

C. Pursuant to Section 15-1302 of the City Code, the following uses are currently not permitted in the IL zone district. The prohibition of any such land uses shall continue to apply even if the City adopts less restrictive citywide use limitations for the IL zoning district.

1. Animal Raising
2. Dairy
3. Intensive Industrial
4. Mining and Quarrying
5. Rendering
6. Salvage and Wrecking

7. Sales Lot, Feed Lot, Stockyard

8. Slaughterhouse

D. The interior footprint of any existing structure shall not be expanded by an area greater than ten percent (10%) of the existing exterior footprint as depicted in the most recent site plan for any structure on file with the City as of October 13, 2022.

E. Any truck trips to or from the property shall only follow truck routes designated by the City of Fresno. All truck routes shall avoid pathways adjacent to schools or that traverse through residential neighborhoods.

F. All properties must be landscaped in accordance with Section 15-2305(B)(4) of the City Ordinance.

G. No new use shall generate odors that are detectable offsite.

H. No new use shall generate noise at a level that exceeds the limitations provided in the Fresno Municipal Code.

I. Any new industrial use must tie-in to the City's municipal water system. The use of groundwater from private wells is not permitted.

J. All new industrial uses must acquire and maintain at all times (i) any permits required for any stationary sources, and (ii) certificates from the California Air Resources Board showing compliance with all applicable regulations governing trucks, including yard trucks, that enter onto the Project site, including but not limited to the Truck and Bus Regulation, the Advanced Clean Trucks Regulation, and the Advanced Clean Fleets Regulation

K. Any tenant improvements or other construction activities performed for any new industrial use shall comply with California Green Building Standards.

L. All industrial uses shall fully comply with the California Accidental Release Prevention (CalARP) program. No industrial use shall allow any substance regulated under the CalARP program or other hazardous substance to migrate offsite.

M. In the event that any contamination is discovered on the property, the landowner shall cooperate in good faith and with reasonable diligence with the investigation and remediation of the property by the governmental entity or entities overseeing such investigation and remediation. Nothing herein shall be construed as limiting the right of any landowner to seek indemnification or contribution from any person or entity.

As such, the proposed project would not result in new or more severe impacts related to conformity with land use plans beyond those already analyzed in the SWFSP EIR.

Applicable Mitigation

No substantial changes in environmental circumstances have occurred for this topic, nor revisions to the project, nor new information that could not have been known at the time the SWFSP EIR was certified leading to new or more severe significant impacts, and no new mitigation measures are required.

Conclusion

The SWFSP EIR adequately evaluated the land use and planning impacts of the proposed project. Therefore, there would be no new impacts related to land use and planning associated with the proposed project and additional mitigation is not required.

12. MINERAL RESOURCES

	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New Impact
Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒

Discussion

As identified in the SWFSP, the City of Fresno permits mining only within the Mining (M) Overlay District (Citywide Development Code). Moreover, the boundaries of the SWFSP Plan Area are classified as Mineral Resource Zone (MRZ)-3, which are defined as potential, but unproven mineral resource reserves (State of California, Division of Mines and Geology, Open File Report 99-02). MRZ-2 zones are those areas documented to have regionally significant mineral resources.

Because neither the State nor the City of Fresno identifies the SWFSP Plan Area as containing known regional mineral resource reserves, and because the proposed project does not include any physical changes to the project site, including construction or change in the current land uses, the proposed project would not result in impacts to known mineral resources or locally important mineral resources.

Applicable Mitigation

No substantial changes in environmental circumstances have occurred for this topic, nor revisions to the project, nor new information that could not have been known at the time the SWFSP EIR was certified leading to new or more severe significant impacts, and no new mitigation measures are required.

Conclusion

The SWFSP EIR adequately evaluated the mineral resources impacts of the proposed project. Therefore, there would be no new impacts related to mineral resources associated with the proposed project and additional mitigation is not required.

13. NOISE

	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New Impact
Would the project result in:				
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☐	☒
b. Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☐	☒
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

Discussion

Traffic Noise

Future development in accordance with the SWFSP would cause increases in traffic along local roadways. As discussed in the SWFSP, a substantial increase is defined as a noise increase greater than 3 dBA over existing conditions. Sensitive land uses include residential, schools, churches, nursing homes, hospitals, and open space/recreation areas. Commercial, farmland, and industrial areas are not considered noise sensitive and generally have higher tolerances for exterior and interior noise levels. The SWFSP EIR found that 21 out of the 30 roadway segments analyzed would experience substantial noise increases greater than 3 dBA attributable to buildout of the SWFSP, with future noise levels that exceed the City's maximum average level of 65 dBA L_{dn} or CNEL at residential or noise-sensitive uses and non-sensitive commercial uses. Therefore, increases in traffic noise levels due to the SWFSP would result in a potentially significant impact.

Motor vehicles with their distinctive noise characteristics are the dominant noise source in the vicinity of the project site. The amount of noise varies according to many factors, such as volume of traffic, vehicle mix (percentage of cars and trucks), average traffic speed, and distance from the observer. As indicated above, a characteristic of sound is that a doubling of a noise source is required in order to result in a perceptible (3 dBA or greater) increase in the resulting noise level. The proposed project zoning would be consistent with the existing uses within the project site. In addition, the proposed project does not include any physical changes to the project site, including construction or change in the current land uses. The proposed project would not result in a doubling of traffic volumes along any roadway segment in the vicinity of the project site and would not result in a perceptible increase in traffic noise levels at receptors in the vicinity of the project site. Furthermore, pursuant to Condition of Zoning E identified in Attachment A to this Addendum, any truck trips to or from the project site would only follow truck routes designated by the City of Fresno, as identified in the SWFSP, which avoid pathways adjacent to sensitive receptors like schools or residential neighborhoods. As such, the proposed project would not result in new or more severe impacts related to traffic noise beyond those already analyzed in the SWFSP EIR.

Stationary Source Noise

As discussed in the SWFSP EIR, implementation of the SWFSP would result in an increase in residential, mixed use, office, and commercial development within the SWFSP Plan Area. The primary noise sources from these land uses are landscaping and maintenance activities, heating ventilation and air condition (HVAC) systems, mechanical equipment, and loading docks. Noise generated by residential, office, or commercial uses are generally short-term and intermittent, are generally localized, and are not a substantial source of community noise.

The City's Municipal Code prohibits any noise that exceeds the ambient noise level at receiving residential properties by more than 5 dB, and any noise which "disturbs or unduly annoys" people within schools, hospitals, or churches. The SWFSP EIR determined that since developments would be subject to the restrictions in the Municipal Code, stationary-source noise from these types of proposed land uses would not substantially increase the noise environment. Therefore, noise impacts from stationary sources would be less than significant. Similar to the SWFSP, existing land uses within the project site would be subject to restrictions in the Municipal Code, which would ensure stationary-source noise would not substantially increase the noise environment. Additionally, the proposed Condition of Zoning H, described in Attachment A of this Addendum, also requires any future uses developed in the project parcels to not generate noise at a level that exceeds the limitations provided in the Fresno Municipal Code. Therefore, the proposed project would not result in any new or more significant stationary source noise impacts than were described in the SWFSP EIR.

Vibration

As discussed in the SWFSP EIR, construction operations can generate varying degrees of ground vibration, depending on the construction procedures and equipment. Vibration from construction activities rarely reaches levels that can damage structures, but can achieve the audible and perceptible ranges in buildings close to the construction site. The SWFSP EIR found that vibration generated by construction equipment has the potential to be substantial and exceed applicable thresholds. The SWFSP EIR identified Mitigation Measures NOISE-2a and NOISE-2b, which would reduce construction vibration impacts to a less-than-significant level.

The project site is located in an urbanized area and is currently developed with several existing light industrial buildings. The proposed zoning would be consistent with the existing uses within the project site. In addition, the proposed project does not include any physical changes to the project site, including construction or change in the current land uses. As a result, the proposed project would not result in new or more severe impacts related to vibration beyond those analyzed in the SWFSP EIR.

The SWFSP EIR also found that once operational, the SWFSP EIR would not result in roadway-related vibrations impacts or operations-related vibrations impacts. The proposed zoning would be consistent with the existing uses within the project site. In addition, the proposed project does not include any physical changes to the project site, including construction or change in the current land uses. Furthermore, pursuant to Condition of Zoning E, any truck trips to or from the project site would be required to only follow truck routes designated by the City of Fresno, as identified in the SWFSP, which avoid pathways adjacent to sensitive receptors like schools or residential

neighborhoods that could be affected by vibration impacts. As such, the proposed project would also not result in roadway-related vibrations impacts or operations-related vibrations impacts. Therefore, the proposed project would not result in new or more severe impacts related to operational vibration beyond those already analyzed in the SWFSP EIR.

Construction-Related Noise

The SWFSP EIR found that the construction of individual development projects associated with the SWFSP would temporarily increase the ambient noise environment in the vicinity of each development project, potentially affecting existing and future sensitive uses in the localized vicinity. Because these construction activities may occur near noise-sensitive receptors and because noise disturbances may occur for prolonged periods of time (depending on the project type), construction noise impacts associated with implementation of the SWFSP are considered potentially significant. The SWFSP EIR identified Mitigation Measures NOISE-4a and NOISE-4b to reduce construction noise to the extent feasible; however, impacts would remain significant and unavoidable.

The project site is located in an urbanized area and is currently developed with several existing light industrial buildings. The proposed zoning would be consistent with the existing uses within the project site. In addition, the proposed project does not include any physical changes to the project site, including construction or change in the current land uses. As a result, the proposed project would not result in new or more severe impacts related to construction-related noise beyond those analyzed in the SWFSP EIR.

Airport Noise

The SWFSP EIR found that although implementation of the SWFSP may result in development of new uses within the Airport Influence Area and although noise contours of Fresno Chandler Executive Airport could potentially expand, the developments within the SWFSP Plan Area would be required to comply with the policies set by the Airport Land Use Compatibility Plan and the City's Noise and Safety Element. Thus, with the expectation that future development within the SWFSP Plan Area would follow established approval procedures and would fulfill applicable policies, implementation of the SWFSP would result in less-than-significant impacts due to aircraft-related noise from public airports. The proposed zoning would be consistent with the existing uses within the project site. In addition, the proposed project does not include any physical changes to the project site, including construction or change in the current land uses. As a result, the proposed project would not result in new or more severe impacts related to airport noise beyond those analyzed in the SWFSP EIR.

Applicable Mitigation

No substantial changes in environmental circumstances have occurred for this topic, nor revisions to the project, nor new information that could not have been known at the time the SWFSP EIR was certified leading to new or more severe significant impacts, and no new mitigation measures are required. The Mitigation Measures included in the SWFSP EIR related to noise address potential impacts resulting from construction and would not apply to the proposed project.

Conclusion

The SWFSP EIR adequately evaluated the noise impacts of the proposed project. Therefore, there would be no new impacts related to noise associated with the proposed project and additional mitigation is not required.

14. POPULATION AND HOUSING

	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New Impact
Would the project:				
a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☐	☒
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

Discussion

The SWFSP EIR evaluated potential environmental impacts associated with approximately 7,131 new housing units, 2,489,065 square feet of office space, and 1,698,040 square feet of retail space. The proposed project consists of rezoning 11 parcels located in the SWFSP Plan Area from Neighborhood Mixed Use (NMX) to the prior designation of Industrial - Light (IL). The proposed zoning would be consistent with the existing uses within the project site. In addition, the proposed project does not include any physical changes to the project site, including construction or change in the current land uses. As such, the proposed project would not generate a population increase in the SWFSP Plan Area and would not displace a residential population or existing housing, as the project site is currently developed with several existing light industrial buildings. Similarly, the proposed project would not result in an expansion of urban services, nor would it open additional undeveloped land for future growth. Therefore, the proposed project would not result in new or more significant population growth and/or housing impacts than were analyzed and described in the SWFSP EIR.

Applicable Mitigation

No substantial changes in environmental circumstances have occurred for this topic, nor revisions to the project, nor new information that could not have been known at the time the SWFSP EIR was certified leading to new or more severe significant impacts, and no new mitigation measures are required.

Conclusion

The SWFSP EIR adequately evaluated the population and housing impacts of the proposed project. Therefore, there would be no new impacts related to population and housing associated with the proposed project and additional mitigation is not required.

15. PUBLIC SERVICES

	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New Impact
Would the project:				
a. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
i. Fire protection?	☐	☐	☐	☒
ii. Police protection?	☐	☐	☐	☒
iii. Schools?	☐	☐	☐	☒
iv. Parks?	☐	☐	☐	☒
v. Other public facilities?	☐	☐	☐	☒

Discussion

The SWFSP EIR evaluated potential environmental impacts associated with approximately 7,131 new housing units, 2,489,065 square feet of office space, and 1,698,040 square feet of retail space. The proposed project consists of rezoning 11 parcels located in the SWFSP Plan Area from Neighborhood Mixed Use (NMX) to the prior designation of Industrial - Light (IL). The proposed zoning would be consistent with the existing uses within the project site. In addition, the proposed project does not include any physical changes to the project site, including construction or change in the current land uses. As such, the proposed project would not generate a population increase in the area and would not result in increased demand for public services, including fire protection, police protection, schools, parks, or other public facilities. Therefore, the proposed project would not result in new or more significant impacts to public services than were analyzed and described in the SWFSP EIR.

Applicable Mitigation

No substantial changes in environmental circumstances have occurred for this topic, nor revisions to the project, nor new information that could not have been known at the time the SWFSP EIR was certified leading to new or more severe significant impacts, and no new mitigation measures are required.

Conclusion

The SWFSP EIR adequately evaluated the public services impacts of the proposed project. Therefore, there would be no new impacts related to public services associated with the proposed project and additional mitigation is not required.

16. RECREATION

	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New Impact
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☒

Discussion

The SWFSP EIR evaluated potential environmental impacts associated with approximately 7,131 new housing units, 2,489,065 square feet of office space, and 1,698,040 square feet of retail space. The proposed project consists of rezoning 11 parcels located in the SWFSP Plan Area from Neighborhood Mixed Use (NMX) to the prior designation of Industrial - Light (IL). The proposed zoning would be consistent with the existing uses within the project site. In addition, the proposed project does not include any physical changes to the project site, including construction or change in the current land uses. As such, the proposed project would not generate a population increase in the area and would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. In addition, the proposed project does not include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. Therefore, the proposed project would not result in new or more significant recreation impacts than were analyzed and described in the SWFSP EIR.

Applicable Mitigation

No substantial changes in environmental circumstances have occurred for this topic, nor revisions to the project, nor new information that could not have been known at the time the SWFSP EIR was certified leading to new or more severe significant impacts, and no new mitigation measures are required.

Conclusion

The SWFSP EIR adequately evaluated the recreation impacts of the proposed project. Therefore, there would be no new impacts related to recreation associated with the proposed project and additional mitigation is not required.

17. TRANSPORTATION

	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New Impact
Would the project:				
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☒	☐
b. Conflict or be inconsistent with CEQA Guidelines §15064.3, subdivision (b)?	☐	☐	☐	☒
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☒
d. Result in inadequate emergency access?	☐	☐	☐	☒

Discussion

Conflict with a Program, Plan, Ordinance or Policy Addressing the Circulation System

As discussed in the SWFSP EIR, development associated with the SWFSP would increase the amount of vehicle traffic, which would require the improvement and expansion of the roadway network in the SWFSP Plan Area to serve the associated travel demand. The SWFSP EIR used the travel demand forecasting (TDF) model developed for the Fresno General Plan MEIR to forecast the amount of traffic generated by the SWFSP. For the existing plus SWFSP scenario, the development potential associated with the SWFSP was added to the Fresno General Plan MEIR TDF model baseline land uses. The SWFSP's land uses included residential units and retail, office, and industrial employment. The SWFSP EIR found that potential impacts associated with roadway segment operations, intersection operations, and queueing would be less than significant.

The following discussion is based on the Limited Traffic Analyses - Trip Generation Comparison[12] prepared for the proposed project (included as the Appendix to this Environmental Checklist). The Limited Traffic Analyses - Trip Generation Comparison utilized data provided in the Institute of Transportation Engineers (ITE) Trip Generation Manual, 11th Edition, to estimate the number of trips anticipated to be generated by the existing and proposed land uses at the project site for comparison purposes. Table B presents trip generation characteristics of the proposed project for three different ITE land use alternatives (Code 110 - General Light Industrial; Code 140 – Manufacturing; and Code 150 – Warehousing), all are similar to the existing development within the project site. The bottom row of Table B presents the worst-case (maximum) trip generation estimate of the three land uses for each scenario (daily, A.M. peak hour, and P.M. peak hour), which would be the estimated project trip generation.

[12] Peters Engineering Group. 2023. *Limited Traffic Analyses - Trip Generation Comparison Proposed Elm Avenue Rezone Southeast of the Intersection of Elm and Annadale Avenues Fresno, California.* September 6.

Table B: Proposed Project Trip Generation Calculations

Land use	Size	Daily	AM Peak Hour			PM Peak Hour		
			In	Out	Total	In	Out	Total
General Light Industrial (110)	896,952 square feet	**4,370**	**584**	**80**	**664**	82	502	584
Manufacturing (140)	896,952 square feet	4,262	464	147	611	**206**	**458**	**664**
Warehousing (150)	896,952 square feet	1,534	118	35	153	45	117	162
Worst-Case Volume		**4,370**	**584**	**80**	**664**	**206**	**458**	**664**

Source: Peters Engineering Group (September 2023)

Table C presents trip generation characteristics based on a hypothetical Neighborhood Mixed Use (NMX) project, which includes a mix of uses and residential units that would be typical of 55.5-acre neighborhood mixed use project. The hypothetical NMX project is based on the following assumptions:

- 12 acres of apartment uses at 16 dwelling units per acre resulting in 192 units;
- 12 acres of townhome/condominium uses at 16 dwelling units per acre resulting in 192 units;
- 12 acres of single-family, attached uses at 10 dwelling units per acre resulting in 120 units;
- 3 acres of mid-rise with first-floor retain and upper floor residential uses at 16 dwelling units per acre resulting in 48 units;
- 9 acres of neighborhood shopping center at 25-percent floor area ratio (FAR) resulting in 98,010 square feet of building area;
- 6 acres of office at 25-percent FAR resulting in 65,340 square feet of building area; and
- 1.5 acres of parks, roads, and other uses generating negligible trips.

Table C: Hypothetical Project Trip Generation Calculations

Land use	Size	Daily	AM Peak Hour			PM Peak Hour		
			In	Out	Total	In	Out	Total
Multi-Family (Low-Rise) (220)	384 dwelling units	2,590	37	117	154	124	72	196
Single-Family Attached Housing (215)	120 dwelling units	864	15	43	58	41	28	69
Mid-Rise Residential with 1st-Floor Commercial (230)	48 dwelling units	166	5	17	22	13	5	18
Shopping Plaza (40-150k) (821)	98,010 square feet	9,262	215	131	346	425	460	885
General Office Building (710)	65,340 square feet	802	102	14	116	20	97	117
Internal Capture[1]	-	-181	-3	-9	-12	-9	-15	-14
Total		**13,503**	**371**	**313**	**684**	**614**	**657**	**1,271**

Source: Peters Engineering Group (September 2023)
Notes:
[1] Internal capture is assumed to be 5 percent of residential trips.

Table D presents the net project trip generation based on the difference between the hypothetical NMX project land use trip generation (Table C) and the proposed project trip generation (Table B).

Table D: Net Project Trip Generation

Scenario	Daily	AM Peak Hour	PM Peak Hour
Proposed Project	4,370	664	664
Neighborhood Mixed Use (NMX) Project	13,503	684	1,271
Difference	**-9,133**	**-20**	**-607**

Source: Peters Engineering Group (September 2023)

As shown in Table D, the proposed project would result in fewer trips than the hypothetical NMX project in the AM Peak hour, and substantially fewer daily and PM Peak Hour trips. As such, the proposed project would result in fewer vehicle trips compared to those evaluated in the SWFSP EIR as the proposed zoning would result in lower density than the NMX land uses. As such, the proposed project would result in a reduced impact than what was identified in the SWFSP EIR.

Vehicle Miles Traveled

CEQA Guidelines section 15064.3 was certified and adopted in December 2018. Section 15064.3 provides that VMT is the most appropriate metric to assess transportation impacts. Other relevant considerations may include a project's effects on transit and nonmotorized travel. Section 15064.3, subdivision (b) further provides that transportation projects that reduce VMT should be presumed to cause a less-than-significant impact. For roadway capacity projects, a lead agency has "discretion to determine the appropriate measure of transportation impact consistent with CEQA and other applicable requirements." Based on CEQA Guidelines section 15064.3, VMT analysis will be required Statewide beginning July 1, 2020. The VMT analysis included in the Limited Traffic Analyses - Trip

Generation Comparison is based on the City of Fresno's *CEQA Guidelines for Vehicle Miles Traveled Thresholds* (City Guidelines), dated June 25, 2020.

The SWFSP EIR estimated VMT associated with implementation of the SWFSP. As shown in Table 4.14-12 of the SWFSP EIR, VMT with implementation of the SWFSP was projected to increase from 285,232 miles to 1,806,108 miles per weekday under cumulative conditions, an increase of 1,520,876 miles over existing conditions.

Although Table B provides a project trip generation estimate, that estimate is relative to a comparison of land uses. The project site is fully developed and no new construction or change in the current development and uses is proposed. Since the proposed project would not generate new trips above existing conditions, the proposed project would not generate new VMT. As such, the proposed project would result in a less-than-significant impact related to VMT and would not result in any new or more significant impacts on VMT than were described in the SWFSP EIR.

Design Features

As discussed in the SWFSP EIR, a review of the SWFSP revealed no potential internal policy inconsistencies or discrepancies related to hazards associated with design features or incompatible uses. Implementation of the SWFSP would increase the amount of vehicle traffic, which would require the improvement and expansion of the roadway network in the SWFSP. The SWFSP identifies a roadway system, bikeways, trails, and sidewalks that will be constructed along with policy direction for future transit service to facilitate transportation in the SWFSP. New transportation facilities will be designed according to applicable federal, State, and local design standards, which will minimize traffic hazards. In addition, the SWFSP EIR contains various goals and policies related to the implementation of complete streets, the design of transportation facilities to improve safety and reduce conflicts, and identifying alternative truck routes to reduce their impact on sensitive users. The policies also encourage reduced vehicle speeds on roadways, which have been shown to improve overall safety by reducing the severity of collisions and improve driver awareness. As a result, the SWFSP EIR determined that implementation of the SWFSP would result in a less-than-significant impact related to hazards due to roadway design features or incompatible uses.

The project site is located in an urbanized area and is currently developed with several existing light industrial buildings. The proposed zoning would be consistent with the existing uses within the project site. In addition, the proposed project does not include any physical changes to the project site, including construction or change in the current land uses. As a result, the proposed project would not result in new or more severe impacts related to hazards due to roadway design features or incompatible uses beyond those analyzed in the SWFSP EIR.

Applicable Mitigation

No substantial changes in environmental circumstances have occurred for this topic, nor revisions to the project, nor new information that could not have been known at the time the SWFSP EIR was certified leading to new or more severe significant impacts, and no new mitigation measures are required.

Conclusion

The SWFSP EIR adequately evaluated the transportation impacts of the proposed project. Therefore, there would be no new impacts related to transportation associated with the proposed project and additional mitigation is not required.

18. TRIBAL CULTURAL RESOURCES

	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New Impact
Would the project:				
a. Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)? Or	☐	☐	☐	☒
ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☐	☐	☒

Discussion

As discussed in the SWFSP EIR, impacts from future development within the SWFSP Plan Area could impact unknown archaeological resources including Native American artifacts and human remains. The SWFSP EIR identifies that implementation of MEIR Mitigation Measures CUL-1, CUL-2, and CUL-4 would reduce impacts to historic resources, archeological resources and unknown human remains to a less-than-significant level. This finding applies to tribal cultural resources. As such, development associated with the SWFSP EIR would be required to implement MEIR Mitigation Measures CUL-1, CUL-2, and CUL-4, as applicable, and identified in the SWFSP EIR, to address potential impacts to unknown archaeological resources including Native American artifacts and human remains. The proposed project does not include any physical changes to the project site, including construction or change in the current land uses. As a result, the proposed project would not result in new or more severe impacts related to tribal cultural resources beyond those analyzed in the SWFSP EIR.

Applicable Mitigation

Development associated with the SWFSP EIR would be required to implement MEIR Mitigation Measures CUL-1, CUL-2, and CUL-4, as applicable, and identified in the SWFSP EIR, to address potential impacts to unknown archaeological resources including Native American artifacts and human remains. Otherwise, no substantial changes in environmental circumstances have occurred for this topic, nor revisions to the project, nor new information that could not have been known at the time the SWFSP EIR was certified leading to new or more severe significant impacts. Given that the proposed project would not include any physical changes within the project site, the Mitigation

Measures included in the SWFSP EIR related to Cultural Resources and Tribal Cultural Resources included to address potential impacts resulting from construction would not apply to the proposed project. No new mitigation measures are required.

Conclusion

The SWFSP EIR adequately evaluated the tribal cultural resources impacts of the proposed project. Therefore, there would be no new impacts related to tribal cultural resources associated with the proposed project and additional mitigation is not required.

19. UTILITIES AND SERVICE SYSTEMS

	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New Impact
Would the project:				
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☐	☒
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☐	☒
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☐	☒
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☐	☒
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☐	☒

Discussion

Construction of New or Expanded Utility Facilities

The SWFSP EIR found that the potential long-term impacts related to water supply, treatment, and distribution requirements of the baseline versus SWFSP differ by 3 percent and are considered nominal and therefore, less than significant for full implementation of the SWFSP.

The SWFSP EIR found that implementation of the SWFSP would result in the need for construction of new wastewater treatment facilities or expansion of existing facilities to serve future land uses and population, the construction of which could cause significant environmental effects. The SWFSP EIR identifies that implementation of MEIR Mitigation Measures USS-4 through USS-9 would reduce impacts to a less-than-significant level. As such, development associated with the SWFSP EIR would be required to implement MEIR Mitigation Measures USS-4 through USS-9, as applicable, and identified in the SWFSP EIR, to address potential impacts resulting from the construction of new, or expansion of existing wastewater treatment facilities.

As discussed in the SWFSP EIR, the SWFSP Plan Area as a whole, as well as the 16 individual watershed areas associated with the SWFSP Plan Area, have FMFCD-planned facilities, which are sufficient to handle the projected flows. The baseline facilities for the SWFSP Plan Area are sufficient to provide drainage for the planned improvements without significant environmental impacts. Compliance with planning and regulatory requirements requires additions and adjustments to capacity are incorporated into planning and improvement buildout within the SWFSP Plan Area. FMFCD plans for drainage facilities but does not construct facilities until such time as development.

As such, the SWFSP EIR found that impacts related to the construction of new stormwater treatment facilities or expansion of baseline facilities would be less than significant.

The SWFSP EIR concluded that the SWFSP would not conflict with the use, operation, or maintenance of existing utility lines. In addition, as projects are proposed, each applicant of future development within the Plan Area would be required to submit site plans that show existing utility lines and proposed changes to the project site and follow local construction regulations, thus reducing the risk of accidental damage to existing lines.

The project site is located in an urbanized area and is currently developed with several existing light industrial buildings. The proposed zoning would be consistent with the existing uses within the project site. In addition, the proposed project does not include any physical changes to the project site, including construction or change in the current land uses. As a result, the proposed project would not result in new or more severe impacts related to expanded water, wastewater, stormwater, electric power natural gas, or telecommunication facilities beyond those analyzed in the SWFSP EIR. No new mitigation measures are required.

Water Supply

As identified above, the SWFSP EIR found that the potential long-term impacts related to water supply, treatment, and distribution requirements of the baseline versus SWFSP differ by 3 percent and are considered nominal and therefore, less than significant for full implementation of the SWFSP. In addition, the SWFSP EIR determined that waste supply and water treatment impacts would be less than significant upon compliance with regulatory requirements and SWFSP policies for full implementation of the SWFSP.

The project site is located in an urbanized area and is currently developed with several existing light industrial buildings. The proposed zoning would be consistent with the existing uses within the project site. In addition, the proposed project does not include any physical changes to the project site, including construction or change in the current land uses. As such, the proposed project would not result in long-term impacts related to water supply, treatment, and distribution requirements. Therefore, the proposed project would not result in new or more significant impacts associated with water supply than were analyzed and described in the SWFSP EIR. No new mitigation measures are required.

Wastewater

The SWFSP EIR found that the SWFSP would result in an estimated increase of 2.9 percent in wastewater annually produced for the SWFSP. The SWFSP determined that a 2.9 percent increase is not considered significant, however, the SWFSP was found to have a potentially significant impact associated with wastewater treatment requirements and waste discharge requirements. To reduce the potential impacts associated with wastewater discharge permits, the City would be required to increase wastewater treatment capacity as well as obtain revised and new waste discharge permits. The policies included in the General Plan would reduce the potential impacts associated with wastewater treatment requirements and waste discharge requirements, including those associated with the SWFSP. The SWFSP EIR also found that implementation of the SWFSP would result in a determination by the wastewater treatment provider which serves or may serve the SWFSP that it

has adequate capacity to serve the SWFSP's projected demand in addition to the provider's baseline commitments. The SWFSP EIR found that implementation of MEIR Mitigation Measures USS-4 through USS-9 would reduce potential impacts related to the construction of new, or expansion of existing wastewater treatment facilities to a less-than-significant level. As such, development associated with the SWFSP EIR would be required to implement MEIR Mitigation Measures USS-4 through USS-9, as applicable, and identified in the SWFSP EIR, to address potential impacts resulting from the construction of new, or expansion of existing wastewater treatment facilities.

The project site is located in an urbanized area and is currently developed with several existing light industrial buildings. The proposed zoning would be consistent with the existing uses within the project site. In addition, the proposed project does not include any physical changes to the project site, including construction or change in the current land uses. As such, the proposed project would not result in long-term impacts related to wastewater treatment. Therefore, the proposed project would not result in new or more significant impacts associated with wastewater than were analyzed and described in the SWFSP EIR. No new mitigation measures are required.

Solid Waste

As discussed in the SWFSP EIR, the 2014 Master Plan development was found to have potential for significant impact principally due to the planned closure of the American Avenue landfill scheduled for 2031. To reduce the potentially significant impacts associated with the solid waste disposal, the City will need to increase disposal capacity. The SWFSP EIR identified Mitigation Measure MEIR Mitigation Measure USS-22 to ensure that the City evaluate additional landfill locations and shall not approve additional development that could contribute solid waste to a landfill that is at capacity until additional capacity is provided. As such, development associated with the SWFSP EIR would be required to implement MEIR Mitigation Measure USS-22, as applicable, and identified in the SWFSP EIR, to address potential impacts associated with solid waste disposal.

The project site is located in an urbanized area and is currently developed with several existing light industrial buildings. The proposed zoning would be consistent with the existing uses within the project site. In addition, the proposed project does not include any physical changes to the project site, including construction or change in the current land uses. As such, the proposed project would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. Therefore, the proposed project would not result in new or more significant impacts associated with solid waste than were analyzed and described in the SWFSP EIR. No new mitigation measures are required.

Applicable Mitigation

Development associated with the SWFSP EIR would be required to implement MEIR Mitigation Measures USS-4 through USS-9; and MEIR Mitigation Measure USS-22, as applicable, and identified in the SWFSP EIR, to address potential impacts related to the construction of new, or expansion of existing wastewater treatment facilities, and potential impacts associated with solid waste disposal, respectively. Otherwise, no substantial changes in environmental circumstances have occurred for this topic, nor revisions to the project, nor new information that could not have been known at the time the SWFSP EIR was certified leading to new or more severe significant impacts, and no new mitigation measures are required.

Conclusion

The SWFSP EIR adequately evaluated the utilities and service systems impacts of the proposed project. Therefore, there would be no new impacts related to utilities and service systems associated with the proposed project and additional mitigation is not required.

20. WILDFIRE

	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

Discussion

As discussed in Section 9 of this Environmental Checklist, Hazards and Hazardous Materials, the project site is located in a primarily developed urban area and is not located adjacent to wildland areas, and therefore the proposed project is not expected to expose people or structures to a significant risk of loss, injury, or death involving wildland fires. Therefore, the proposed project would not result in new or more severe impacts related to wildfire than were identified in the SWFSP EIR.

Applicable Mitigation

No substantial changes in environmental circumstances have occurred for this topic, nor revisions to the project, nor new information that could not have been known at the time the SWFSP EIR was certified leading to new or more severe significant impacts, and no new mitigation measures are required.

Conclusion

The SWFSP EIR adequately evaluated the wildfire impacts of the proposed project. Therefore, there would be no new impacts related to wildfire associated with the proposed project and additional mitigation is not required.

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APPENDIX

TRAFFIC ANALYSIS

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PETERS ENGINEERING GROUP
A CALIFORNIA CORPORATION

Mr. John Kinsey
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September 6, 2023

Subject: Limited Traffic Analyses - Trip Generation Comparison
Proposed Elm Avenue Rezone
Southeast of the Intersection of Elm and Annadale Avenues
Fresno, California

FAASTER Reference No.: P23-03006
Assigned Planner: Mr. Rob Holt

Dear Mr. Kinsey:

Introduction

This report presents the results of limited traffic analyses for the subject project. The analysis focuses on the anticipated number of vehicle trips resulting from the project. The primary purpose of this study is to evaluate the net change in trips expected to be generated at the site as a result of the proposed rezone.

Project Description

The project site consists of 11 parcels on approximately 55.31 acres bounded by Elm Avenue on the west, State Route 41 on the east, and Annadale Avenue on the north. A site vicinity map and site plan are presented in Figures 1 and 2 following the text of this report. The southern boundary is located approximately 675 feet north of North Avenue. The project site is developed with several existing light industrial buildings totaling approximately 896,952 square feet of floor space with a mix of light industrial, manufacturing, warehousing, and distribution.

The current City of Fresno General Plan (General Plan) Planned Land Use designation and zoning for the project site is Neighborhood Mixed Use (NMX). The NMX zoning district is intended to provide mixed-use residential zoning districts that include local-serving, pedestrian-oriented commercial development, such as smaller independent retail shops and professional offices in two- to three-story buildings. Development within the NMX zoning district is expected to include ground-floor neighborhood retail uses and upper-level housing or offices, with a mix of small lot single-family houses, townhomes, and multi-family dwelling units on side streets, in a horizontal or vertical mixed-use orientation.

In October 2017, the City of Fresno adopted the Southwest Fresno Specific Plan (SWFSP) to implement the goals and policies set forth in the General Plan and include ideas and measures that were tailored and reviewed by members of the Southwest Fresno community.

The SWFSP provides guiding principles, policies, development criteria, and implementation strategies to coordinate private development and public improvements given the unique opportunities and characteristics of Southwest Fresno. The SWFSP identified a development capacity of approximately 748,820 square feet of employment land uses (which includes light industrial uses). However, like the General Plan, the development capacity identified in the SWFSP only identifies new development and only takes into account the development of parcels that have higher opportunities for development, such as parcels that are vacant, open agriculture, or rural residential (partially vacant). The SWFSP does not identify the project site as an opportunity site identified for development. Upon adoption of the SWFSP the land use designation and zoning of the project site was changed from Industrial - Light (IL) to Neighborhood Mixed Use (NMX).

The existing uses within the project site as described above are inconsistent with the existing NMX zoning. The proposed project consists of rezoning 11 parcels located in the SWFSP Plan Area from NMX to the prior designation of Industrial - Light (IL). The IL zoning district is intended to provide a diverse range of light industrial uses, including limited manufacturing and processing, research and development, fabrication, utility equipment and service yards, wholesaling, warehousing, and distribution activities. Small-scale retail and ancillary office uses are also permitted. Light industrial areas may serve as buffers between Heavy Industrial zoning districts and other land uses and otherwise are generally located in areas with good transportation access, such as along railroads and freeways. The proposed zoning would be consistent with the existing development and uses within the project site.

In addition to the proposed zoning change, the proposed project would also include land use amendments to the SWFSP and General Plan in order for the land use designations to be consistent with the proposed zoning and exemption from the following policies of the SWFSP.

The proposed project does not include any physical changes to the project site, any new construction, or any change in the current development and uses.

Trip Generation

Data provided in the Institute of Transportation Engineers (ITE) *Trip Generation Manual, 11th Edition* are used to estimate the number of trips anticipated to be generated by the existing and proposed land uses at the site for comparison purposes. Table 1 presents trip generation characteristics of the proposed project for three different ITE land use alternatives all similar to the existing development at the Project site. The bottom row of Table 1 presents the worst-case (maximum) trip generation estimate of the three land uses for each scenario (daily, A.M. peak hour, and P.M. peak hour).

Table 1
Project Trip Generation Calculations

Land Use	Size	Daily		A.M. Peak Hour					P.M. Peak Hour				
		Rate	Total	Rate	In:Out	In	Out	Total	Rate	In:Out	In	Out	Total
General Light Industrial (110)	896,952 sq. ft.	4.87	4,370	0.74	88:12	584	80	664	0.65	14:86	82	502	584
Manufacturing (140)	896,952 sq. ft.	4.75	4,262	0.68	76:24	464	147	611	0.74	31:69	206	458	664
Warehousing (150)	896,952 sq. ft.	1.71	1,534	0.17	77:23	118	35	153	0.18	28:72	45	117	162
WORST-CASE TOTALS:	-	-	**4,370**	-	-	**584**	**80**	**664**	-	-	**206**	**458**	**664**

Reference: *Trip Generation Manual, 11th Edition,* Institute of Transportation Engineers 2022
Rates are reported in trips per 1,000 square feet of building area.

For informational purposes, Table 2 presents estimates of truck trip generation based on data available from ITE.

Table 2
Project Truck Trip Generation Calculations

Land Use	Size	Daily		A.M. Peak Hour					P.M. Peak Hour				
		Rate	Total	Rate	In:Out	In	Out	Total	Rate	In:Out	In	Out	Total
General Light Industrial (110)	896,952 sq. ft.	0.25	224	0.01	60:40	5	4	9	0.01	50:50	4	5	9
Manufacturing (140)	896,952 sq. ft.	0.45	404	0.03	56:44	15	12	27	0.03	41:59	11	16	27
Warehousing (150)	896,952 sq. ft.	0.60	538	0.02	52:48	9	9	18	0.03	52:48	14	13	27
WORST-CASE TOTALS:	-	-	**538**	-	-	**15**	**12**	**27**	-	-	**11**	**16**	**27**

Reference: *Trip Generation Manual, 11th Edition,* Institute of Transportation Engineers 2022
Rates are reported in truck trips per 1,000 square feet of building area.

It is assumed that a hypothetical project in the NMX zoning district at the site may have the following characteristics:

- 12 acres of apartment uses at 16 dwelling units per acre = 192 units
- 12 acres of townhome/condominium uses at 16 dwelling units per acre = 192 units
- 12 acres of single-family, attached uses at 10 dwelling units per acre = 120 units
- 3 acres of mid-rise with first-floor retain and upper floor residential uses at 16 dwelling units per acre = 48 units
- 9 acres of neighborhood shopping center at 25-percent floor area ratio (FAR) = 98,010 square feet of building area
- 6 acres of office at 25-percent FAR = 65,340 square feet of building area
- 1.5 acres of parks, roads, and other uses generating negligible trips

Table 3 presents trip generation characteristics of the hypothetical NMX project.

Table 3
Trip Generation Calculations – Hypothetical NMX Project

Land Use	Size	Daily		A.M. Peak Hour					P.M. Peak Hour				
		Rate	Total	Rate	In:Out	In	Out	Total	Rate	In:Out	In	Out	Total
Multi-Family (Low-Rise) (220)	384	6.74	2,590	0.40	24:76	37	117	154	0.51	63:37	124	72	196
Single-Family Attached Housing (215)	120	7.20	864	0.48	25:75	15	43	58	0.57	59:41	41	28	69
Low-Rise Residential with 1st-Floor Commercial (230)	48	3.44	166	0.44	23:77	5	17	22	0.36	71:29	13	5	18
Shopping Plaza (40-150k) (821)	98,010 sq. ft.	94.49	9,262	3.53	62:38	215	131	346	9.03	48:52	425	460	885
General Office Building (710)	65,340 sq. ft.	FC1	802	FC2	88:12	102	14	116	FC3	17:83	20	97	117
Internal Capture*	-	-	-181	-	-	-3	-9	-12	-	-	-9	-5	-14
TOTALS:	**-**	**-**	**13,503**	**-**	**-**	**371**	**313**	**684**	**-**	**-**	**614**	**657**	**1,271**

Reference: *Trip Generation Manual, 11th Edition,* Institute of Transportation Engineers 2017
Rates are reported in trips per dwelling unit or per 1,000 square feet of building area, as applicable.
FC1: Fitted curve: $Ln(T) = 0.87Ln(X) + 3.05$ FC2: Fitted curve: $Ln(T) = 0.86Ln(X) + 1.16$
FC3: Fitted curve: $Ln(T) = 0.83Ln(X) + 1.29$
* Internal capture is assumed to be 5 percent of residential trips.

Table 4 presents the net Project trip generation by taking the difference between the NMX land use trip generation (Table 3) and the proposed Project trip generation (worst-case totals from Table 1).

Table 4
Net Project Trip Generation

Scenario	Daily	A.M. Peak Hour	P.M. Peak Hour
Project	4,370	664	664
NMX	13,503	684	1,271
Difference	**-9,133**	**-20**	**-607**

The results of the trip generation analyses suggest that the proposed project will result in substantially fewer trips than the NMX zoning.

Vehicle Miles Traveled (VMT)

The applicable documents providing guidance relative to VMT analyses for CEQA are the State of California Governor's Office of Planning and Research (OPR) *Technical Advisory on Evaluating Traffic Impacts in CEQA* dated December 2018 and the City of Fresno *CEQA Guidelines for Vehicle Miles Traveled Thresholds* dated June 25, 2020 (City Guidelines).

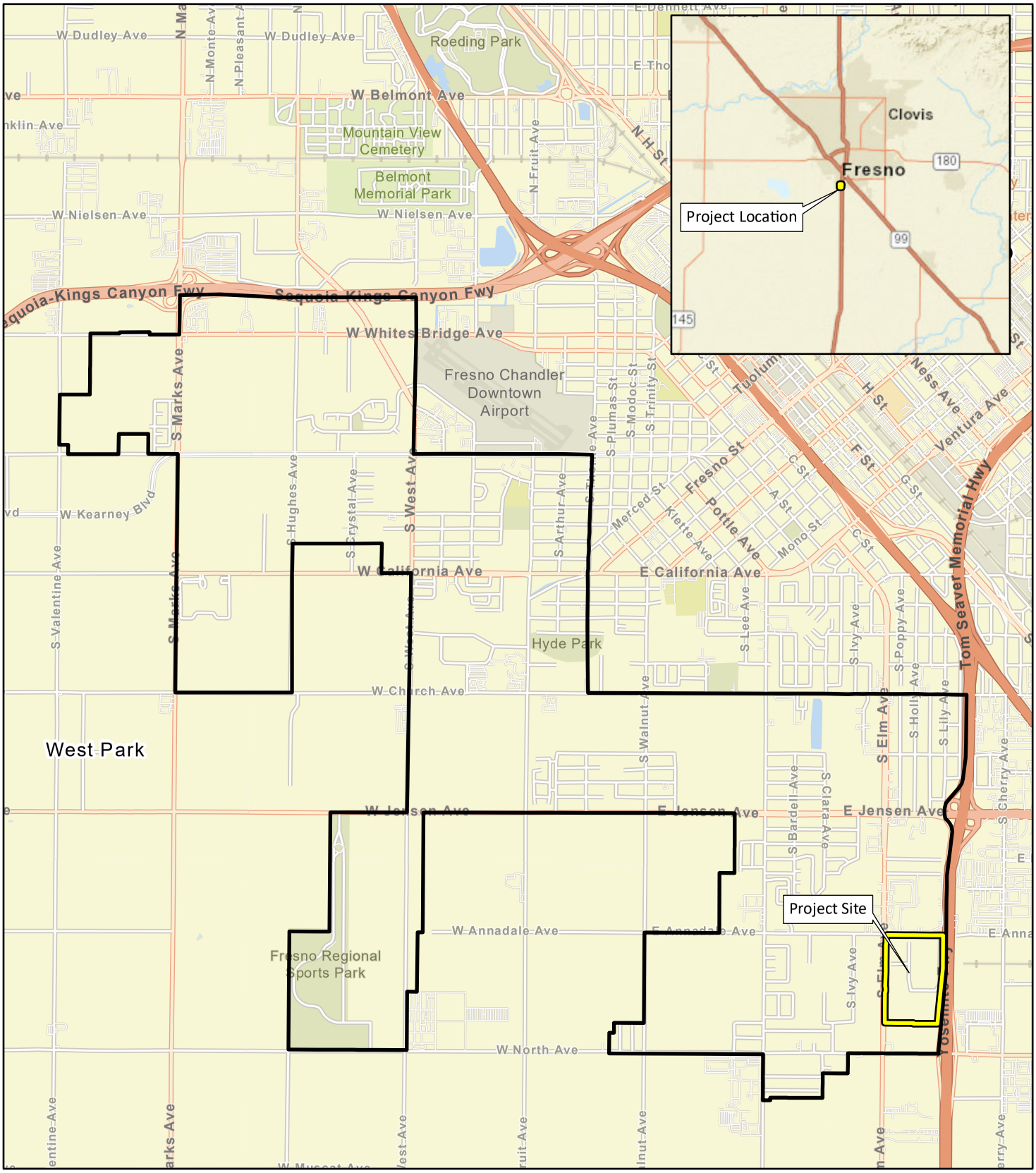
Although Table 1 provides a project trip generation estimate, that estimate is relative to a comparison of land uses. It should be noted that the project site is fully developed and that no new construction or change in the current development and uses is proposed. Since the number of trips will not be increased above the existing condition, the project generates zero new VMT and may be presumed to cause a less-than-significant transportation impact. Additionally, the project site is located within a green area as depicted on Figure 7 of the City Guidelines, indicating an average VMT of less than 22.3 per employee at the project site. Therefore, the project would also be presumed to cause a less-than-significant transportation impact based on the City Guidelines.

Thank you for the opportunity to perform these traffic analyses. Please feel free to contact our office if you have any questions.

PETERS ENGINEERING GROUP

John Rowland, PE, TE

Attachments: Figures 1 and 2



LSA

LEGEND

Project Site

Southwest Fresno Specific Plan Area

FIGURE 1

N

0 1500 3000

FEET

Elm Avenue Rezone Project

Project Location and Regional Vicinity Map

SOURCE: ESRI World Street Maps (2023); City and County of Fresno (2020).

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LSA

Project Site Boundary

0 500 1000
FEET

FIGURE 2

Elm Avenue Rezone Project
Aerial Photograph and Surrounding Land Uses

SOURCE: Google Earth, 4/21/2021.

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