

Exhibit H

MEMORANDUM

DATE: January 15, 2021

To: Rob Holt, Planner III

FROM: Amy Fischer, Principal
Kyle Simpson, Associate

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 15 parcels by the City of Fresno (City). In 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, certified in October 2017, which is hereby incorporated by reference.

INTRODUCTION

The proposed project is minor modification to the SWFSP that is limited to the rezoning of 15 parcels located in the SWFSP Plan Area from Neighborhood Mixed Use (NMU) 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

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.

with the proposed zoning, and would include the following text addition to Policy LU-8.1 (shown in double-underline text) that would exempt the project site from the following policies 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 92-acre area bounded by Vine Ave on the north, State Route 41 on the east, Elm Avenue on the west, and East Chester/East Samson Avenue on the south, in order to allow the continuation of legally established and non-polluting uses established and operating as of March 4, 2021, within existing buildings.

LU-8.2 Prioritize the “Reverse Triangle,” bounded by Jensen Avenue, Central Avenue, Highway 41, and Highway 99, as the City’s targeted area for new industrial development.

LU-8.3 When 85 percent of the “Reverse Triangle,” bounded by Jensen Avenue, Central Avenue, Highway 41, and Highway 99, is developed with Heavy Industrial uses designate parcels along the east side of Elm Avenue south of North Avenue for future Light Industrial uses, mixed with the Plan’s planned Office uses.

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

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 15 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 to 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 A to this Addendum also 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) identify 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 A, Project Description and 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 and Environmental Checklist

ATTACHMENT A: PROJECT DESCRIPTION AND ENVIRONMENTAL CHECKLIST

Addendum to Final Program EIR (SCH No. 2017031012)

1.	Project title: Development Permit Application No. P20-01665
2.	Lead agency name and address: City of Fresno Planning and Development Department 2600 Fresno Street Fresno, CA 93721
3.	Contact person and phone number: Rob Holt, Planner III City of Fresno Planning and Development Department (559) 621-8056
4.	Project location: 2721 South Elm Avenue, Fresno, CA 93706: The project site is bounded by South Elm Avenue to the west, East Vine Avenue to the north, SR 41 to the east, and adjacent parcels and East North Avenue to the south. Shown in Figure 1 and Figure 2. (APN: 328-240-49, 328-240-50, 328-240-32, 328-240-47, 328-290-25, 328-290-28, 328-290-29, 328-211-43, 328-211-44, 328-211-45, 328-211-46, 328-211-47, 328-211-48, 328-211-49, 328-211-50)
5.	Project sponsor's name and address: Steven Brock SDG Fresno 570 LLC 1690 West Shaw Avenue, Suite 200 Fresno, CA 93711
6.	General & Community plan land use designation: Neighborhood Mixed Use (NMX)
7.	Zoning: Neighborhood Mixed Use (NMX). Shown in Figure 3.

8.

Description of project:

Development Permit Application No. P20-01665 was filed by John P. Kinsey, Esq., on behalf of Applicants SDG Fresno 570, LLC, Span Development, LLC, PW Fund B, LP, and Mid-Valley Recycling, LLS (the “Applicants”). The Applicants propose to rezone 15 parcels located in the Southwest Fresno Specific Plan (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 would include the following text addition to Policy LU-8.1 (shown in double-underline text) that would exempt the project site from the following policies 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 92-acre area bounded by Vine Ave on the north, State Route 41 on the east, Elm Avenue on the west, and East Chester/East Samson Avenue on the south, in order to allow the continuation of legally established and non-polluting uses established and operating as of March 4, 2021, within existing buildings.

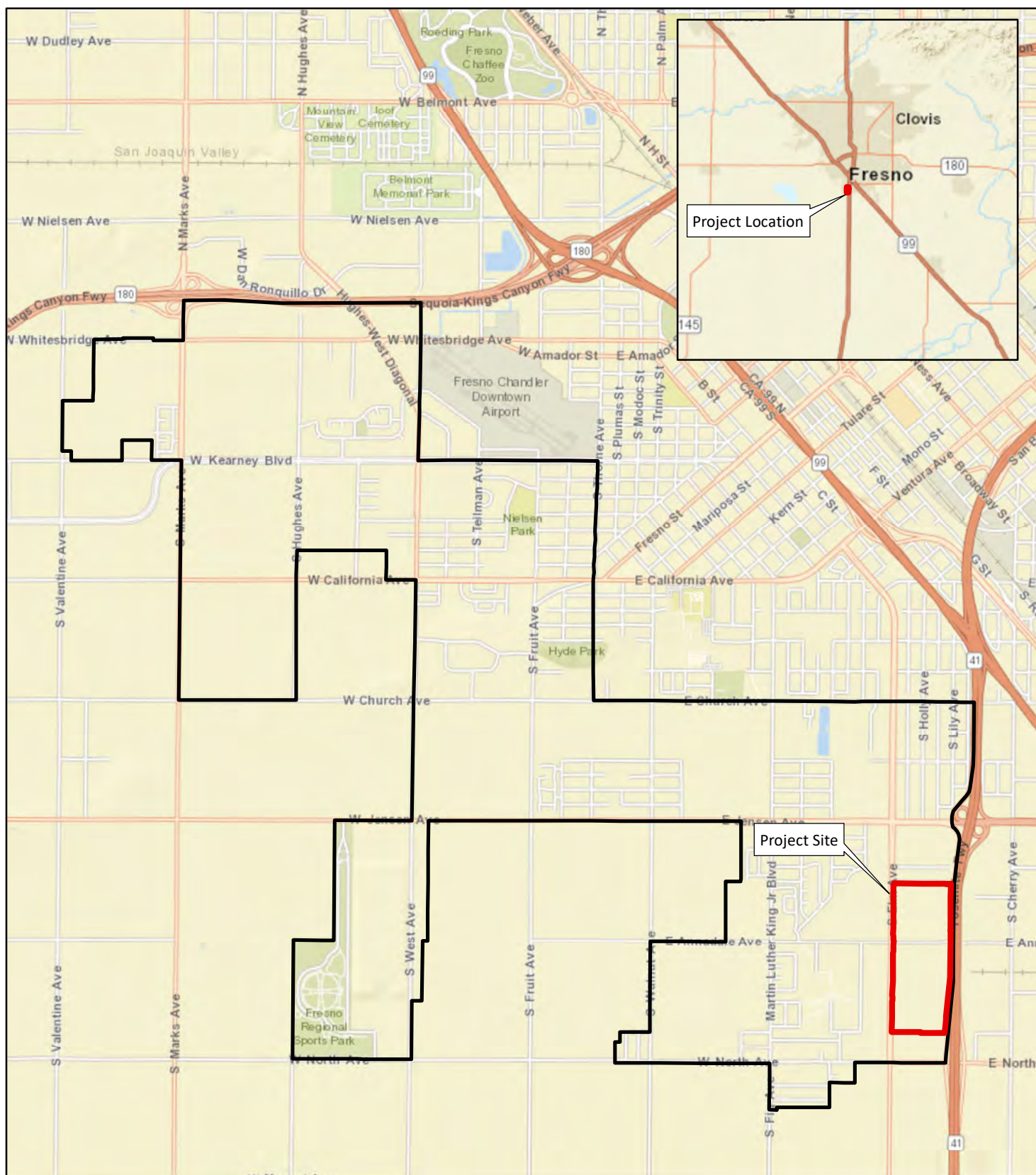
LU-8.2 Prioritize the “Reverse Triangle,” bounded by Jensen Avenue, Central Avenue, Highway 41, and Highway 99, as the City’s targeted area for new industrial development.

LU-8.3 When 85 percent of the “Reverse Triangle,” bounded by Jensen Avenue, Central Avenue, Highway 41, and Highway 99, is developed with Heavy Industrial uses designate parcels along the east side of Elm Avenue south of North Avenue for future Light Industrial uses, mixed with the Plan’s planned Office uses.

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

	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 15 parcels from Neighborhood Mixed Use (NMZ) to Industrial - Light (IL). • Adoption of text update to Policy LU-8.1 of the SWFSP that would exempt the project site from compliance with Policies LU-8.1, LU-8.2, and LU-8.3 of the SWFSP.																				
9.	Surrounding land uses and setting: <table border="1"> <thead> <tr> <th></th><th>Planned Land Use</th><th>Existing Zoning</th><th>Existing Land Use</th></tr> </thead> <tbody> <tr> <td>North</td><td>Commercial - Community</td><td>Commercial Community</td><td>medium low density residential</td></tr> <tr> <td>East</td><td>Employment - Heavy Industrial</td><td>Heavy Industrial</td><td>heavy industrial</td></tr> <tr> <td>South</td><td>Neighborhood Mixed-Use</td><td>Neighborhood Mixed Use</td><td>light industrial</td></tr> <tr> <td>West</td><td>Commercial – Community/ Neighborhood Mixed-Use</td><td>Commercial Community/ Neighborhood Mixed Use</td><td>medium high density residential/light industrial</td></tr> </tbody> </table>		Planned Land Use	Existing Zoning	Existing Land Use	North	Commercial - Community	Commercial Community	medium low density residential	East	Employment - Heavy Industrial	Heavy Industrial	heavy industrial	South	Neighborhood Mixed-Use	Neighborhood Mixed Use	light industrial	West	Commercial – Community/ Neighborhood Mixed-Use	Commercial Community/ Neighborhood Mixed Use	medium high density residential/light industrial
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South	Neighborhood Mixed-Use	Neighborhood Mixed Use	light industrial																		
West	Commercial – Community/ Neighborhood Mixed-Use	Commercial Community/ Neighborhood Mixed Use	medium high density residential/light industrial																		
10.	Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement): None.																				
11.	Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code (PRC) Section 21080.3.1? If so, has consultation begun? The State requires lead agencies to consider the potential effects of proposed projects and consult with California Native American tribes during the local planning process for the purpose of protecting Traditional Tribal Cultural Resources through the California Environmental Quality Act (CEQA) Guidelines. Pursuant to PRC Section 21080.3.1, the lead agency shall begin consultation with the California Native American tribe that is traditionally and culturally affiliated with the geographical area of the proposed project. Such significant cultural resources are either sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a tribe which is either on or eligible for inclusion in the California Historic Register or local																				

	historic register, or, the lead agency, at its discretion, and support by substantial evidence, choose to treat the resources as a Tribal Cultural Resources (PRC Section 21074(a)(1-2)). According to the most recent census data, California is home to 109 currently recognized Indian tribes. Tribes in California currently have nearly 100 separate reservations or Rancherias. Fresno County has a number of Rancherias such as Table Mountain Rancheria, Millerton Rancheria, Big Sandy Rancheria, Cold Springs Rancheria, and Squaw Valley Rancheria. These Rancherias are not located within the city limits. Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See PRC Section 21083.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per PRC Section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that PRC Section 21082.3(c) contains provisions specific to confidentiality. Pursuant to Senate Bill 18 (SB 18), Native American tribes traditionally and culturally affiliated with the project area were invited to consult regarding the project based on a list of contacts provided by the Native American Heritage Commission (NAHC). This list includes tribes that requested notification pursuant to Assembly Bill 52 (AB 52). The final date to comment for all listed Tribes was January 27, 2021. The applicant and City staff did not receive any comments from any of the Tribes. The proposed project does not result in any physical effects and the use of an addendum to the SWFSP EIR does not require consultation with Native American tribes.
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LSA

LEGEND



Project Site



Southwest Fresno Specific Plan Area



SOURCE: ESRI World Street Maps (04/2020); City and County of Fresno (04/2020).

I:\WJH2001\GIS\Maps\Figure 1 Project Location and Regional Vicinity Map.mxd (4/13/2020)

Elm Avenue Rezone Project
Project Location and Regional Vicinity Map

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FIGURE 2

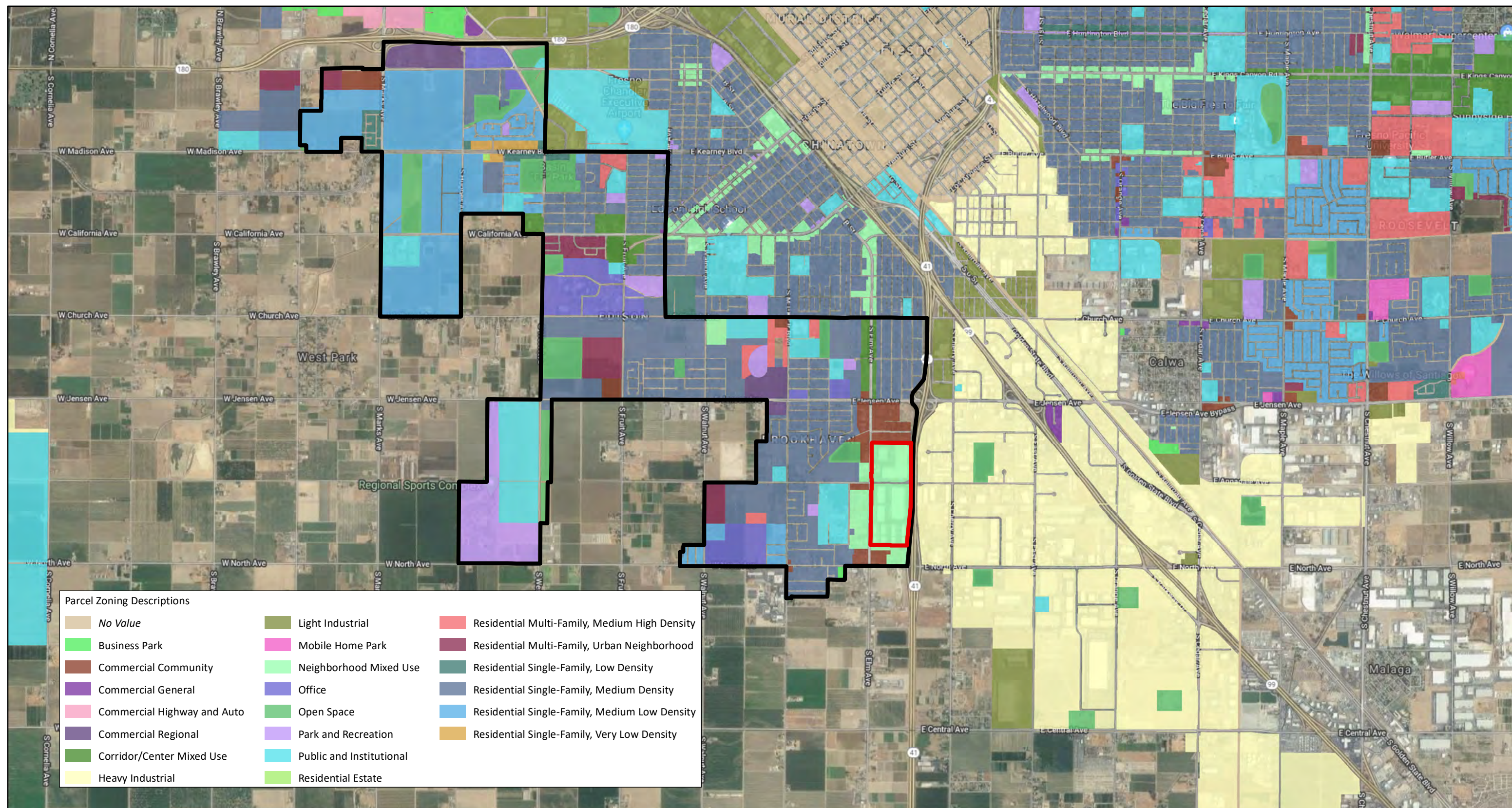
LSA



Project Site

Elm Avenue Rezone Project
Aerial Photograph and Surrounding Land Uses

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LSA

LEGEND

- Project Site
- Southwest Fresno Specific Plan Area



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SOURCE: Google Maps Hybrid (10/2019); City and County of Fresno (04/2020).

I:\WJH2001\GIS\Maps\Planning\Figure 3_Existing Zoning.mxd (4/13/2020)

FIGURE 3

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

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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) is within the scope of the Southwest Fresno Specific Plan (SWFSP) Environmental Impact Report (EIR), which was certified by the City of Fresno 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 identify 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.

ENVIRONMENTAL ISSUES	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New Impact
I. AESTHETICS – Except as provided in PRC Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?				X
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				X

ENVIRONMENTAL ISSUES	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New Impact
c) In non-urbanized areas, substantially degrade the existing visual character or quality public views of the site and its surroundings? (Public views are those that are experienced from 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?				X
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?				X

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 15 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. 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.

ENVIRONMENTAL ISSUES	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New Impact
II. AGRICULTURE AND FORESTRY RESOURCES – In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				

ENVIRONMENTAL ISSUES	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New Impact
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?				X
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?				X
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))?				X
d) Result in the loss of forest land or conversion of forest land to non-forest use?				X
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?				X

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.

ENVIRONMENTAL ISSUES	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New Impact
III. AIR QUALITY – Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan (e.g., by having potential emissions of regulated criterion pollutants which exceed the San Joaquin Valley Air Pollution Control Districts (SJVAPCD) adopted thresholds for these pollutants)?				X
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 (including releasing emissions which exceed quantitative thresholds for ozone precursors)?				X

ENVIRONMENTAL ISSUES	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New Impact
c) Expose sensitive receptors to substantial pollutant concentrations?				X
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?				X

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 (O₃), nitrogen dioxide (NO₂), sulfur dioxide (SO₂), lead (Pb), and suspended particulate matter (PM_{2.5} and PM₁₀). The SJVAB is designated as non-attainment for O₃ and PM_{2.5} for federal standards and non-attainment for O₃, PM₁₀, 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.¹

To assure the SJVAB's continued attainment of the USEPA PM₁₀ standard, the SJVAPCD adopted the 2007 PM₁₀ Maintenance Plan in September 2007.² 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 µg/m³ and 24-hour PM_{2.5} standard of 65 µg/m³, the 2006 24-hour PM_{2.5} standard of 35 µg/m³, and the 2012 annual PM_{2.5} standard of 12 µg/m³.³

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 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

¹ San Joaquin Valley Air Pollution Control District. 2016. *2016 Plan for the 2008 8-Hour Ozone Standard*. June 16. Website: www.valleyair.org/Air_Quality_Plans/Ozone-Plan-2016.htm (accessed June 2020).

² San Joaquin Valley Air Pollution Control District. 2007. *2007 PM₁₀ Maintenance Plan and Request for Redesignation*. Available online at: www.valleyair.org/Air_Quality_Plans/docs/Maintenance%20Plan10-25-07.pdf (accessed June 2020).

³ 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 June 2020).

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 Fresno Council of Government's (FCOG) 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 15 parcels located in the SWFSP Plan Area from Neighborhood Mixed Use (NMU) 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 FCOG'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. Therefore, the proposed project would not result in new or more significant population growth 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 PM₁₀, 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 (PM₁₀ 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 O₃, PM₁₀, 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 NOx 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 15 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 project at buildout would generate air pollutant emissions that exceed SJVAPCD's regional significance thresholds for VOC, NOx, CO, PM10, and PM2.5 at buildout. Emissions of VOC and NOx that exceed the SJVAPCD regional threshold would cumulatively contribute to the O3 and particulate matter (PM10 and PM2.5) 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 in reducing NOx and particulate matter emissions. In addition, application of SJVACPD Rule 9510 would contribute in 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 in 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. 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, 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. 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. 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 project vicinity. 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, 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.

ENVIRONMENTAL ISSUES	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New Impact
IV. BIOLOGICAL RESOURCES – 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?				X
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 US Fish and Wildlife Service?				X
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				X
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?				X

ENVIRONMENTAL ISSUES	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New Impact
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				X
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?				X

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 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 site and vicinity after redevelopment. The site is not occupied by, or suited for, any special-status species. However, as identified in the SWFSP EIR, implementation of Mitigation Measure BIO-1.1 (as identified in the Master EIR [MEIR] prepared for the Fresno General Plan) and Mitigation Measures BIO-1.2 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 MEIR Mitigation Measure BIO-1.1 and Mitigation Measures BIO-1.2 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 MEIR 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 project would not interfere substantially with wildlife movement. As a result, no impact would occur.

Conflict with Local Policies

The 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 USFWS and 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 and Mitigation Measures BIO-1.2 through BIO-1.8 were identified in the MEIR 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.

ENVIRONMENTAL ISSUES	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New Impact
V. CULTURAL RESOURCES – Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?				X
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?				X
c) Disturb any human remains, including those interred outside of formal cemeteries?				X

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. Implementation of MEIR Mitigation Measure CUL-1 as identified in the SWFSP EIR would ensure that potential impacts to previously unidentified historic resources would remain at a less-than-significant level. 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. MEIR Mitigation Measure CUL-2 was identified in the SWFSP EIR to ensure that potential impacts to previously unidentified archeological resources would remain at a less-than-significant level. 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. Implementation of MEIR Mitigation Measure CUL-4 from the SWFSP EIR would ensure that potential impacts related to human remains would be less than significant. 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

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 Cultural Resources address potential impacts resulting from construction and would not apply to the proposed project.

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.

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

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, these 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. 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 report is the 2019 Integrated Energy Policy Report. The 2019 Integrated Energy Policy Report provides 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 2019 Integrated Energy Policy Report covers a broad range of topics, including implementation of Senate Bill 350, integrated resource planning, distributed energy resources, transportation electrification, solutions to increase resiliency 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 2019 Integrated Energy Policy Report. 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.

ENVIRONMENTAL ISSUES	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New Impact
VII. GEOLOGY AND SOILS – Would the project:				
a) Directly or Indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				X
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.				X
ii) Strong seismic ground shaking?				X
iii) Seismic-related ground failure, including liquefaction?				X
iv) Landslides?				X
b) Result in substantial soil erosion or the loss of topsoil?				X
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?				X

ENVIRONMENTAL ISSUES	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New Impact
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?				X
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?				X
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?				X

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 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 implementation of MEIR Mitigation Measure CUL-3 as identified in the SWFSP EIR would ensure that potential impacts related to paleontological resources 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 paleontological resources 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 paleontological resources address potential impacts resulting from construction and would not apply to the proposed project.

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.

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

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 (CO₂);
- Methane (CH₄);
- Nitrous oxide (N₂O);
- Hydrofluorocarbons (HFCs);
- Perfluorocarbons (PFCs); and
- Sulfur Hexafluoride (SF₆).

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 CO₂, methane, and N₂O, some gases, like HFCs, PFCs, and SF₆ 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 CO₂, 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 CO₂ over a specified time period. GHG emissions are typically measured in terms of pounds or tons of “CO₂ equivalents” (CO₂e).

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 and may be consistent with

the City's GHG Reduction Plan development checklist resulting 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 California Air Resources Board (CARB) Scoping Plan, FCOG's Regional Transportation Plan/Sustainable Communities Strategy, and the City of Fresno's GHG Reduction Plan. 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, FCOG's Regional Transportation Plan/Sustainable Communities Strategy, and the City of Fresno's GHG Reduction Plan. The project would be subject to all applicable permit and planning requirements in place or adopted by the City of Fresno. Therefore, the proposed project would be consistent with the 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.

ENVIRONMENTAL ISSUES	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New Impact
IX. HAZARDS AND HAZARDOUS MATERIAL – Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?				X
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?				X
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				X
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?				X
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?				X

ENVIRONMENTAL ISSUES	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New Impact
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				X
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?				X

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 15 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. 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. 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. 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.

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. 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. 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; although, the SWFSP identifies new truck routes away from existing and planned residential neighborhoods. 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 2.3 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. 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.

Wildfire

The project site is located in a primarily developed urban area and is not located adjacent to wildland areas, and therefore the 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.

ENVIRONMENTAL ISSUES	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New Impact
X. HYDROLOGY AND WATER QUALITY – Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?				X

ENVIRONMENTAL ISSUES	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New Impact
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?				X
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:				X
i) Result in a substantial erosion or siltation on- or off-site;				X
ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site:				X
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				X
iv) impede or redirect flood flows?				X
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?				X
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?				X

DISCUSSION

Water Quality Standards

Construction. The proposed project consists of rezoning 15 parcels located in the SWFSP Plan Area from Neighborhood Mixed Use (NMU) 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 polycyclic aromatic 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. 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 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).⁴ The project site is also not located within a dam failure inundation area. Therefore, the 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

⁴ Federal Emergency Management Agency. 2009. Flood Insurance Rate Map, Map Number 06019C2110H, effective February 18.

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. The project site and surrounding topography is flat and therefore the project would not result in impacts related to mudflows (a type of landslide that occurs on slopes). Therefore, the 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 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. 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.

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.

ENVIRONMENTAL ISSUES	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New Impact
XI. LAND USE AND PLANNING – Would the project:				
a) Physically divide an established community?				X

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?				X
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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 15 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 15 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.

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 would include the following text addition to Policy LU-8.1 (shown in double-underline text) that would exempt the project site from the following policies 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 92-acre area bounded by Vine Ave on the north, State Route 41 on the east, Elm Avenue on the west, and East Chester/East Samson Avenue on the south, in order to allow the continuation of legally established and non-polluting uses established and operating as of March 4, 2021, within existing buildings.

LU-8.2 Prioritize the “Reverse Triangle,” bounded by Jensen Avenue, Central Avenue, Highway 41, and Highway 99, as the City’s targeted area for new industrial development.

LU-8.3 When 85 percent of the “Reverse Triangle,” bounded by Jensen Avenue, Central Avenue, Highway 41, and Highway 99, is developed with Heavy Industrial uses designate parcels along the east side of Elm Avenue south of North Avenue for future Light Industrial uses, mixed with the Plan’s planned Office uses.

The City has determined that the project is exempt from the cited policies above as the project site is currently developed with a mix of heavy and light industrial manufacturing, warehousing, and distribution, totaling approximately 1,579,835 square feet of floor space. 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 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.

ENVIRONMENTAL ISSUES	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New Impact
XII. MINERAL RESOURCES – Would the project:				

ENVIRONMENTAL ISSUES	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New Impact
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?				X
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?				X

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.

ENVIRONMENTAL ISSUES	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New Impact
XIII. NOISE – 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?				X
b) Generation of excessive groundborne vibration or groundborne noise levels?				X
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 two 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?				X

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 Ldn 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 project vicinity. 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 project vicinity and would not result in a perceptible increase in traffic noise levels at receptors in the project vicinity. 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. 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. 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.

ENVIRONMENTAL ISSUES	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New Impact
XIV. POPULATION AND HOUSING – 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)?				X
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				X

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 15 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.

ENVIRONMENTAL ISSUES	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New Impact
XV. PUBLIC SERVICES – 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:				X
Fire protection?				X
Police protection?				X
Schools?				X

ENVIRONMENTAL ISSUES	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New Impact
Parks?				X
Other public facilities?				X

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 15 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.

ENVIRONMENTAL ISSUES	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New Impact
XVI. RECREATION - Would the project:				
a) 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?				X
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?				X

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 15 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.

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

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 Comparison⁵ 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, 10th Edition, to estimate the number of trips anticipated to be generated by the existing and proposed land uses at the site for comparison purposes. Table B presents trip generation characteristics of the proposed project, which consists of the existing development at the project site.

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)	186,000 square feet	924	115	16	131	16	102	118
Warehousing (150)	1,393,835 square feet	2,426	183	54	237	72	193	265
Total		3,350	298	70	368	88	295	383

Source: Peters Engineering Group (August 2020)

Table C presents trip generation characteristics based on a hypothetical Neighborhood Mixed Use (NMX) project. The hypothetical NMX project is based on the following assumptions:

- 20 acres of apartment uses at 16 dwelling units per acre resulting in 320 units;
- 20 acres of townhome/condominium uses at 16 dwelling units per acre resulting in 320 units;
- 20 acres of single-family, attached uses at 10 dwelling units per acre resulting in 200 units;
- 5 acres of mid-rise with first-floor retail and upper floor residential uses at 16 dwelling units per acre resulting in 80 units;
- 15 acres of neighborhood shopping center at 25-percent floor area ratio (FAR) resulting in 163,350 square feet of building area;
- 10 acres of office at 25-percent FAR resulting in 108,900 square feet of building area; and
- 2.5 acres of parks, roads, and other uses generating negligible trips.

Table C: Hypothetical Project Trip Generation Calculations

5 Peters Engineering Group. 2020. *Limited Traffic Analyses - Trip Generation Comparison Proposed Elm Avenue Rezone East of Elm Avenue near Annadale Avenue Fresno, California*. July 22.

Land use	Size	Daily	AM Peak Hour			PM Peak Hour		
			In	Out	Total	In	Out	Total
Multi-Family (Low-Rise) (220)	640 dwelling units	4,686	68	227	295	226	113	359
Single-Family Detached Housing (220) ¹	200 dwelling units	1,888	37	111	148	125	73	198
Mid-Rise Residential with 1st-Floor Commercial (231)	80 dwelling units	276	7	17	24	20	9	29
Shopping Center (820)	163,530 square feet	8,400	145	89	234	375	407	782
General Office Building (710)	180,900 square feet	1,154	111	18	129	20	104	124
Internal Capture ²	-	-1,910	-51	-21	-72	-79	-102	-181
Total		14,494	317	441	758	687	624	1,311

Source: Peters Engineering Group (August 2020)

Notes:

¹ It is assumed that single-family attached uses will generate trips similar to ITE Code 210.

² Internal capture is 20 percent of shopping center trips plus 20 percent of office 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	3,350	368	383
Neighborhood Mixed Use (NMX) Project	14,494	758	1,311
Difference	-11,144	-390	-928

Source: Peters Engineering Group (August 2020)

As shown in Table D, the proposed project would result in substantially fewer trips than the hypothetical NMX project. 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. Because the proposed project would result in a reduction in vehicle miles traveled, the Project would not result in any new or more significant impacts than those identified in the SWFSP.

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 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.

Table B provides a trip generation estimate that 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 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.

ENVIRONMENTAL ISSUES	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New Impact
XVII. TRIBAL CULTURAL RESOURCES – Would the project:				
a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in PRC 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:				X
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in PRC section 5020.1(k), or,				X

ENVIRONMENTAL ISSUES	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New Impact
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 PRC section 5024.1. In applying the criteria set forth in subdivision (c) of PRC section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.				X

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. Impacts would be reduced to a less-than-significant level with implementation of MEIR Mitigation Measures CUL-1, CUL-2, and CUL-4. This finding applies to tribal cultural resources. 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

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 Cultural Resources and Tribal Cultural Resources address potential impacts resulting from construction and would not apply to the proposed project.

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.

ENVIRONMENTAL ISSUES	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New Impact
XIX. UTILITIES AND SERVICE SYSTEMS – Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effect?				X
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?				X
c) Result in a determination by the waste water 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?				X
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?				X
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?				X

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 expansion and new wastewater treatment facilities to serve future land uses and population. Therefore, development in accordance with SWFSP could result in a significant impact on the existing wastewater treatment facilities. The SWFSP EIR found that implementation of the SWFSP would require or result in the construction of new wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. As such, the SWFSP EIR identified MEIR Mitigation Measures USS-4 through USS-9 to reduce impacts to a less-than-significant level.

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 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.

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.

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 with implementation of MEIR Mitigation Measures USS-1 through USS-3, potential impacts 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. 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.

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.

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.

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 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.

ENVIRONMENTAL ISSUES	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New Impact
XX. WILDFIRE – 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?				X

ENVIRONMENTAL ISSUES	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New Impact
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?				X
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?				X
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?				X

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 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
Wanger Jones Helsley PC
265 East River Park Circle, Suite 310
Fresno, California 93720

August 20, 2020

Subject: Limited Traffic Analyses - Trip Generation Comparison
Proposed Elm Avenue Rezone
East of Elm Avenue near Annadale Avenue
Fresno, California

FAASTER Reference No.: P20-01665
Assigned Planner: Mr. Erik Young

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 15 parcels on approximately 92.5 acres bounded by Elm Avenue on the west, State Route 41 on the east, and Vine 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 1,579,835 square feet of floor space with a mix of heavy and light industrial manufacturing, warehousing, and distribution. The warehousing portion covers approximately 1,393,835 square feet of the existing buildings.

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 15 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, 10th 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, which is essentially the existing development at the Project site.

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)	186,000 sq. ft.	4.96	924	0.70	88:12	115	16	131	0.63	13:87	16	102	118
Warehousing (150)	1,393,835 sq. ft.	1.74	2,426	0.17	77:23	183	54	237	0.19	27:73	72	193	265
TOTALS:	-	-	3,350	-	-	298	70	368	-	-	88	295	383

Reference: *Trip Generation Manual, 10th Edition*, Institute of Transportation Engineers 2017
Rates are reported in 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:

- 20 acres of apartment uses at 16 dwelling units per acre = 320 units
- 20 acres of townhome/condominium uses at 16 dwelling units per acre = 320 units
- 20 acres of single-family, attached uses at 10 dwelling units per acre = 200 units
- 5 acres of mid-rise with first-floor retail and upper floor residential uses at 16 dwelling units per acre = 80 units
- 15 acres of neighborhood shopping center at 25-percent floor area ratio (FAR) = 163,350 square feet of building area
- 10 acres of office at 25-percent FAR = 108,900 square feet of building area
- 2.5 acres of parks, roads, and other uses generating negligible trips

Table 2 presents trip generation characteristics of the hypothetical NMX project.

Table 2
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)	640	7.32	4,686	0.46	23:77	68	227	295	0.56	63:37	226	133	359
Single-Family Detached Housing (220)*	200	9.44	1,888	0.74	25:75	37	111	148	0.99	63:37	125	73	198
Mid-Rise Residential with 1 st -Floor Commercial (231)	80	3.44	276	0.30	28:72	7	17	24	0.36	70:30	20	9	29
Shopping Center (820)	163,530 sq. ft.	FC1	8,400	FC2	62:38	145	89	234	FC3	48:52	375	407	782
General Office Building (710)	108,900 sq. ft.	FC4	1,154	FC5	86:14	111	18	129	FC6	16:84	20	104	124
Internal Capture**	-	-	-1,910	-	-	-51	-21	-72	-	-	-79	-102	-181
TOTALS:	-	-	14,494	-	-	317	441	758	-	-	687	624	1,311

Reference: *Trip Generation Manual, 10th 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: $\ln(T) = 0.68\ln(X) + 5.57$ FC2: Fitted curve: $T = 0.50(X) + 151.78$

FC3: Fitted curve: $\ln(T) = 0.74\ln(X) + 2.89$

FC4: Fitted curve: $\ln(T) = 0.97\ln(X) + 2.50$ FC5: Fitted curve: $T = 0.94(X) + 26.49$

FC6: Fitted curve: $\ln(T) = 0.95\ln(X) + 0.36$

* It is assumed that single-family attached uses will generate trips similar to ITE Code 210.

** Internal capture is 20 percent of shopping center trips plus 20 percent of office trips.

Table 3 presents the net Project trip generation by taking the difference between the NMX land use trip generation (Table 2) and the proposed Project trip generation (Table 1).

Table 3
Net Project Trip Generation

Scenario	Daily	A.M. Peak Hour	P.M. Peak Hour
Project	3,350	368	383
NMX	14,494	758	1,311
Difference	-11,144	-390	-928

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

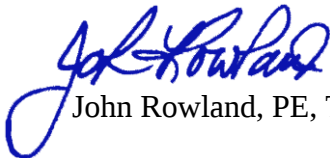
Vehicle Miles Traveled (VMT)

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 18, 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 available screening map.

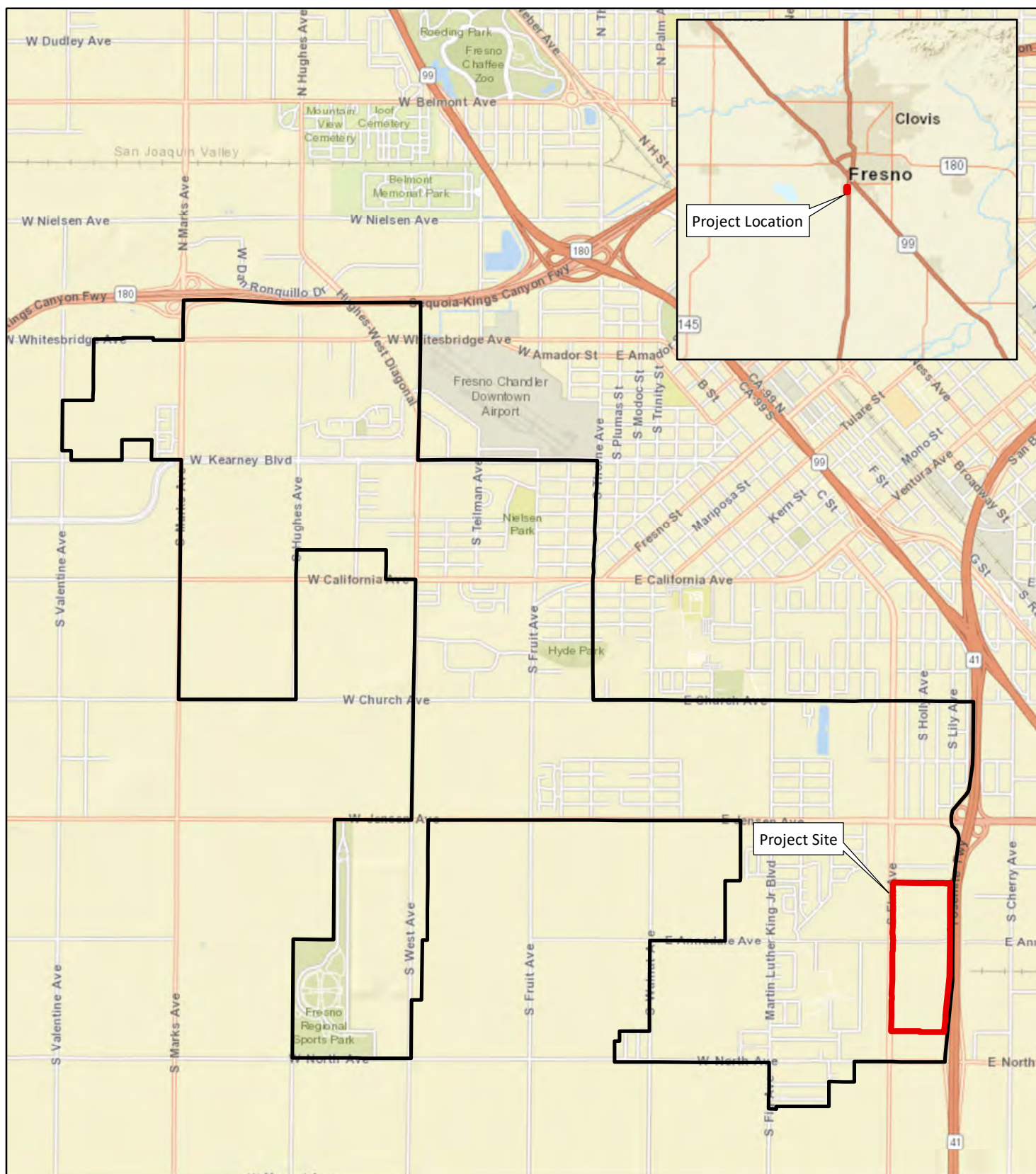
Thank you for the opportunity to perform these traffic analyses. Please feel free to contact our office if you have any questions.

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John Rowland, PE, TE



Attachments: Figures 1 and 2



LSA

LEGEND

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Project Site

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Southwest Fresno Specific Plan Area



0 1500 3000

FEET

SOURCE: ESRI World Street Maps (04/2020); City and County of Fresno (04/2020).

I:\WJH2001\GIS\Maps\Figure 1 Project Location and Regional Vicinity Map.mxd (4/13/2020)

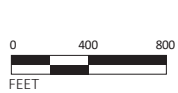
FIGURE 1

Elm Avenue Rezone Project
Project Location and Regional Vicinity Map



FIGURE 2

LSA



Project Site

SOURCES: GOOGLE EARTH, 8/23/18; LSA, 2020.

(FRE10) P:\WJH2001- Elm Avenue Rezone\PRODUCTS\Project Description\Figures\Figure 2.ai (4/13/2020).

Elm Avenue Rezone Project
Aerial Photograph and Surrounding Land Uses

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