## Objection Signature Sheet

**We object to the Notice of Intent to Adopt a Mitigated Negative Declaration listed with Parcel Number P24-00794 even though it is a city wide text code amendment. We object to the text code amendment that would allow ministerial zoning for multi-family in our neighborhood.**

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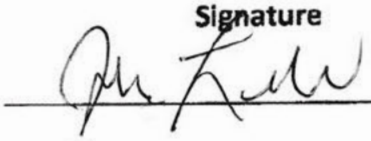
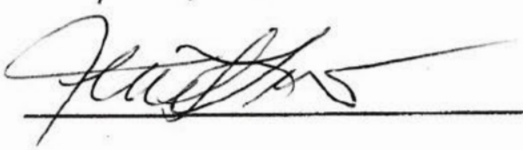
|  | [redacted] |
|  | [redacted] |
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**Send your Objection Signature Sheet to: Adrienne.Asadoorian@fresno.gov**

**Cc: Debbie Nard: [redacted]**

**By DECEMBER 20, 2024**

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| Signature | Address |
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| Brooke J Hamilton | [redacted] |
| Brooke A Hamilton | 1( 1/ |
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| Debra L. Buller | [redacted] |
| Larry Buller | [redacted] |
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OBJECTIONS

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Steve Brandau did not protect his constituents with provisions to revisit parking and density like were done in District 6.

We object to the ministerial zoning that "meets the City's development code." There is no planning involved with this code. The Planning Department does not consider any existing or future problems that might be exacerbated by the development. The planners and city council do not consider the preservation and character of the neighborhood.

The City has created the problems that make multi family development in this neighborhood impractical. We have made the City aware of these problems on NUMEROUS occasions starting with emails to Councilman Karbassi in 2019. We have attended numerous meetings. We delivered 929 signatures to the Planning Department on 9/20/21 and again in May 2024. These signatures were attached to a document that noted:
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6) Public Safety Vehicles. Ambulance and Fire Department vehicles have trouble navigating the roundabout and when Valentine is clogged with traffic, they cannot access the neighborhood NOW.

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8) Ingress and egress. The City is allowing ingress and egress on the two main feeder streets on proposed plans for new developments. This will exacerbate the congestion on these streets at peak times and cause traffic to back up onto Herndon Avenue.

We are aware that the STATE OF CALIFORNIA is pushing this along with many other policies that DO NOT WORK. These proposed developments will be permanent once they are built no matter what problems they cause.

If this amendment is such a good idea, why has the City gone to such great lengths to keep this from the public. When Councilman Karbassi was asked about this notice the response was "was this something you received in the mail?" We never received any answer as to what this was going to do.

The City has refused to keep their promises. They refuse to fix the problems brought forth to them. They definitely are not transparent in their actions.

High density multi family housing has already been rejected by the Project Review Committee, the Planning Commission, and by the City Council. This amendment would basically overturn those decisions and ruin a neighborhood that already has all types of housing. This amendment would negate the will of the people who have already prevailed on this issue despite a secretive, abusive, and uneven playing ground.

As this amendment will further erode the public's right to participate in addressing development in their own communities it should be denied.

# Objection Signature Sheet

We object to the Notice of Intent to Adopt a Mitigated Negative Declaration listed with Parcel Number P24-00794 even though it is a city wide text code amendment. We object to the text code amendment that would allow ministerial zoning for multi-family in our neighborhood.

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| DEEZLA A. RAY | [redacted] |
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Send your Objection Signature Sheet to: Adrienne.Asadoorian@fresno.gov

By DECEMBER 20, 2024

**Subject:** Formal Objection to Proposed Zoning Changes (Parcel Number P24-00794)

To: Adrienne.Asadoorian@fresno.gov

I am writing to formally object to the Notice of Intent to Adopt a Mitigated Negative Declaration related to Parcel Number P24-00794, which is part of a citywide text code amendment. While this amendment affects multiple areas, its implications for our neighborhood are particularly concerning.

This amendment targets three parcels currently zoned for office use and potentially others, in addition to the one parcel already rezoned for high-density multifamily housing at Prospect and Herndon. That rezoning occurred during the 2015 holiday season with little to no input from affected residents. Unlike other districts, such as District 6, this area lacks adequate protections for parking and density concerns, leaving the community vulnerable to overdevelopment.

## Specific Concerns:

1. **Lack of Planning and Neighborhood Consideration**:
   - Ministerial zoning that "meets the City's development code" disregards the unique needs and existing challenges in our neighborhood.
   - There has been no effort to consider how this amendment exacerbates ongoing issues such as traffic congestion, safety, and quality of life.
2. **Broken Promises and Community Frustration**:
   - Despite numerous emails, meetings, and petitions—most notably 929 signatures submitted in September 2021 and May 2024—the City has not addressed longstanding issues, including inadequate parking at Orchid Park, poor road infrastructure, and insufficient traffic mitigation measures.
3. **Traffic and Safety Concerns**:
   - The poorly designed roundabout on Prospect Street, coupled with inadequate access roads, already causes significant congestion. Increased density will only worsen these conditions.
   - There is no safe path for children walking to the local elementary school, further endangering students during peak traffic times.
   - Emergency vehicles such as ambulances and fire trucks struggle to navigate the neighborhood's current infrastructure.
4. **Environmental and Quality-of-Life Impacts**:
   - Increased noise and air pollution due to heavy traffic on Herndon Avenue directly affect residents' well-being.
   - The City's allowance for ingress and egress onto main feeder streets will further congest these roads and create backups onto Herndon.
5. **Lack of Transparency and Public Engagement**:
   - The City has failed to provide clear and timely communication about this amendment, raising concerns about its commitment to transparency.
   - High-density housing proposals have previously been rejected by the Project Review Committee, Planning Commission, and City Council. This amendment would overturn those decisions, disregarding the will of the community.

## Conclusion:

This amendment undermines the public's right to participate in decisions about their neighborhoods and disregards the valid concerns of residents who have fought for responsible development. The proposed changes would impose permanent, detrimental impacts on our community; further eroding trust in the City's planning process.
I respectfully urge the City to reject this amendment. It is imperative that community voices are considered, and that thoughtful, transparent planning takes precedence over rushed policies.
Thank you for your attention to this matter.

Sincerely,

Name: Jimmy Lee Heskett Address: [redacted]

[redacted]

December 14, 2024

RE: Notice of Intent to Adopt a Mitigated Negative Declaration regarding Parcel P24-00794

Dear Ms. Asadoorian:

I am writing to object to the Notice of Intent to Adopt a Mitigated Negative Declaration regarding Parcel P24-00794 and the reconsideration of Building App. No. P21-00989 that previously failed to gain approval by Project Review Committee, the Fresno Planning Commission, and the City Council for numerous problematic issues.. The 82 unit 3 and 4 story apartment complex at Herndon Avenue and N. Prospect Avenue as proposed should not be built as currently planned for a number of significant reasons that present several potential risks and liability for future residents of the facility.

These include:
1. Building evacuation in case of fire,
2. Access to the proposed project off Prospect by the fire department,
3. Safe pedestrian pathways from the proposed project to the H. Roger Tatarian elementary school,
4. Increased traffic thru the poorly configured and too small traffic circle on Prospect, north of Herndon, and
5. Inadequate parking spaces for the proposed complex.

The developer's representative at the Planning Commission meeting stated that the target clientele of the proposed project would be senior citizens. Many elderly individuals have limited mobility and some seniors are easily confused when placed in stressful situations, particularly if they have mild dementia. During a building evacuation because of fire when elevator use is prohibited, many senior citizens may be unable to quickly negotiate third and fourth floor stairways to move to safety outside the buildings. In addition , the four-story portion will not have windows on the eastern side of the building thereby limiting rescue access by firefighters using ladder trucks.

N. Prospect Avenue itself is too narrow at the level of the tiny turn-around circle to accommodate a pickup truck towing a moderate-sized trailer. I question the ability of a fire ladder truck to negotiate a turn into the proposed complex especially if and when facility residents are attempting to move their vehicles to safety. These difficulties would certainly delay both fire fighter evacuations of facility residents and delay implementation of fire fighting efforts.

Despite the developer's belief that the proposed complex would be largely inhabited by senior citizens, one must assume that given its proximity to an elementary school, any number of families with children would also be residents of the complex. Safe pedestrian pathways do not exist currently between the proposed complex and H. Roger Tatarian elementary school; rather children would need to either walk along the gravel shoulder of the narrow two lane portion of N. Valentine Avenue that parallels Herndon Avenue or traverse the open field north of that side road. Placing those young children at risk from drivers hurrying to work along the already congested road seems unwise when increased traffic along N. Prospect from the proposed complex must be assumed.

The poorly designed connection of N. Valentine Avenue to Herndon Avenue, where N. Valentine becomes a frontage road that enters Prospect Avenue from the West, has already created a significant obstacle to the smooth flow of traffic from N. Valentine onto Herndon Avenue. Complicating the flow of traffic further at N. Prospect and Herndon by adding additional traffic from an 82 unit apartment complex will lead to undue congestion and innumerable fender-bender accidents along N. Prospect.

One must expect that most of the target clientele (senior citizens) of the proposed project will be moving into the apartments to "down-size" their remaining years and will have two vehicles or the residents will be working parents with two vehicles. The proposed apartment complex does not have adequate parking facilities to accommodate even 150 vehicles, much less 164 cars and trucks. Local street parking lacks the capacity to support more than a few extra vehicles.

May I suggest that several changes be made to either or both the proposed complex or the surrounding street traffic infrastructure. Certainly, anticipating the numerous problems noted above and providing solutions prospectively would seem wise. I remember that the traffic signal at Marks and Herndon Avenue was constructed to replace the 4-way stop signs only after a Supervisor's teenage daughter was killed in a traffic accident at that intersection. Prospectively dealing with the above mentioned problems might save lives in the future.

I humbly suggest several potential solutions:

1. Down-size the proposed project to a maximum of two-story buildings
2. Move the entrance and exit from the proposed complex to W. Fir Avenue instead of N. Prospect Avenue.
3. Widen the frontage road portion of N. Valentine Avenue that parallels Herndon Avenue and add a sidewalk along the northern portion of that road and along N. Prospect Avenue while widening N. Prospect Avenue itself along with the construction of a larger traffic turning circle to N. Prospect Avenue.
4. Maintain or increase the number of parking spaces in the proposed complex despite down-sizing the number of proposed housing units themselves.

These corrective suggestions surely might be implemented by either the city or the developer of Parcel Number P24-00794 if the City of Fresno were concerned for any future residents of any development project on the aforementioned parcel of land.

In conclusion, I strenuously object to the Notice of Intent to Adopt a Mitigated Negative Declaration as a city wide code amendment and more specifically for application of any such declaration in regard to Parcel Number P24-00794 for the reasons stated above because development of the parcel per Building App. No. P21-00989 without significant corrective measures would place future resident adults and their children at significant risk of injury.

Yours Sincerely,

Virgil M. Airola

**From:** [redacted]
**To:** Adrienne Asadoorian
**Subject:** Object to the Notice of Intent to Adopt a Mitigated Negative Declaration listed with Parcel Number P24-00794
**Date:** Thursday, December 19, 2024 6:27:33 AM

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External Email: Use caution with links and attachments

We would like to object to the Notice of Intent to Adopt a Mitigated Negative Declaration listed with Parcel Number P24-00794 even though it is a city wide text code amendment.
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We object to the ministerial zoning that "meets the City's development code." There is no planning involved with this code. The Planning Department does not consider any existing or future problems that might be exacerbated by the development. The planners and city council do not consider the preservation and character of the neighborhood.
The City has created the problems that make multi family development in this neighborhood impractical. We have made the City aware of these problems on NUMEROUS occasions starting with emails to Councilman Karbassi in 2019. We have attended numerous meetings. We delivered 929 signatures to the Planning Department on 9/20/21 and again in May 2024. These signatures were attached to a document that noted:
1) Inadequate parking for Orchid Park. The parking was inadequate for what they planned the park to be from day 1. It should be noted that original property owners paid park fees and had to wait 10 or more years for the park to be finally built. Councilman Karbassi has acknowledged this problem but it hasn't been fixed. Mayor Jerry Dyer has said that these "neighborhood parks have become regional parks." It should be noted that the Pickleball courts at Orchid Park are one of the most popular in the city. The parking lot often barely accommodates this.
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5) School safety. There should be a direct path from both the existing new developments and the proposed new ones for children to walk to their elementary school.It is not safe for children to navigate alone which generates even more traffic.
6) Public Safety Vehicles. Ambulance and Fire Department vehicles have trouble navigating the roundabout and when Valentine is clogged with traffic, they cannot access the neighborhood.
7) Noise and Air Pollution. Herndon is exponentially busier than it was when the neighborhood was developed. There is a lot more noise that can be heard from blocks away. Sirens, gunning engines, and just the heavier traffic can be heard blocks away.
8) Ingress and egress. The City is allowing ingress and egress on the two main feeder streets on proposed plans for new developments. This will exacerbate the congestion on these streets at peak times and cause traffic to back up onto Herndon Avenue.
We object to the Notice of Intent to Adopt a Mitigated Negative Declaration listed in the subject line We object to the text
code amendment that would allow ministerial zoning for multi-family in our neighborhood. Please consider these our official signatures for objection.
Kellie Romero
Paul Romero

[redacted]

Sent from my iPhone

*Dwight G. Nelson*

[redacted]

December 11, 2024

Mrs. Adrienne Assadoorian, Planner
City of Fresno
2600 Fresno Street
Fresno, CA 93721

RE: Formal Objection to Proposed Zoning Changes (Parcel Number P24-00794)

SENT VIA EMAIL - Adrienne.Asadoorian@fresno.gov

Dear Mrs. Assadoorian,

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This amendment targets three parcels currently zoned for office use and potentially others, in addition to the one parcel already rezoned for high-density multifamily housing at Prospect and Herndon. That rezoning occurred during the 2015 holiday season with little to no input from affected residents. Unlike other districts, such as District 6, this area lacks adequate protections for parking and density concerns, leaving the community vulnerable to overdevelopment.

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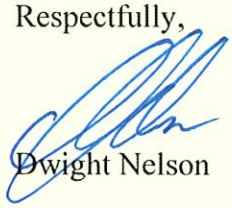
Thank you for your attention to this matter.

Respectfully,



Dwight Nelson

OBJECTIONS

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| Signature | [redacted] |
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| Virgie Farris | [redacted] |
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**Send your Objection Signature Sheet to: Adrienne.Asadoorian@fresno.gov**

**Cc: Debbie Nard: [redacted]**

**By DECEMBER 20, 2024**

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| Signature | Address |
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| Annie Barrios-Copner | [redacted] |
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| Janean Wolfe | [redacted] |
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**Send your Objection Signature Sheet to: Adrienne.Asadoorian@fresno.gov**

**By DECEMBER 20, 2024**

## Objection Signature Sheet

We object to the Notice of Intent to Adopt a Mitigated Negative Declaration listed with Parcel Number P24-00794 even though it is a city wide text code amendment. We object to the text code amendment that would allow ministerial zoning for multi-family in our neighborhood.

| Signature | Address |
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| [signature] AmDee Nelson | [redacted] |
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Cc: Debbie Nard: [redacted]

By DECEMBER 20, 2024

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| [redacted] | [redacted] |
| [redacted] | [redacted] |
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Steve Brandau did not protect his constituents with provisions to revisit parking and density like were done in District 6.

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The City has created the problems that make multi family development in this neighborhood impractical. We have made the City aware of these problems on NUMEROUS occasions starting with emails to Councilman Karbassi in 2019. We have attended numerous meetings. We delivered 929 signatures to the Planning Department on 9/20/21 and again in May 2024. These signatures were attached to a document that noted:

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| Signature | Address |
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| Deborah Morton Sutter | [redacted] |
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Send your Objection Signature Sheet to: Adrienne.Asadoorian@fresno.gov

Cc: Debbie Nard: [redacted]

By DECEMBER 20, 2024

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**Cc: Debbie Nard:** [redacted]

**By DECEMBER 20, 2024**

**From:** [redacted]
**To:** Adrienne Asadoorian
**Subject:** Objection letter.
**Date:** Friday, December 20, 2024 2:35:27 PM

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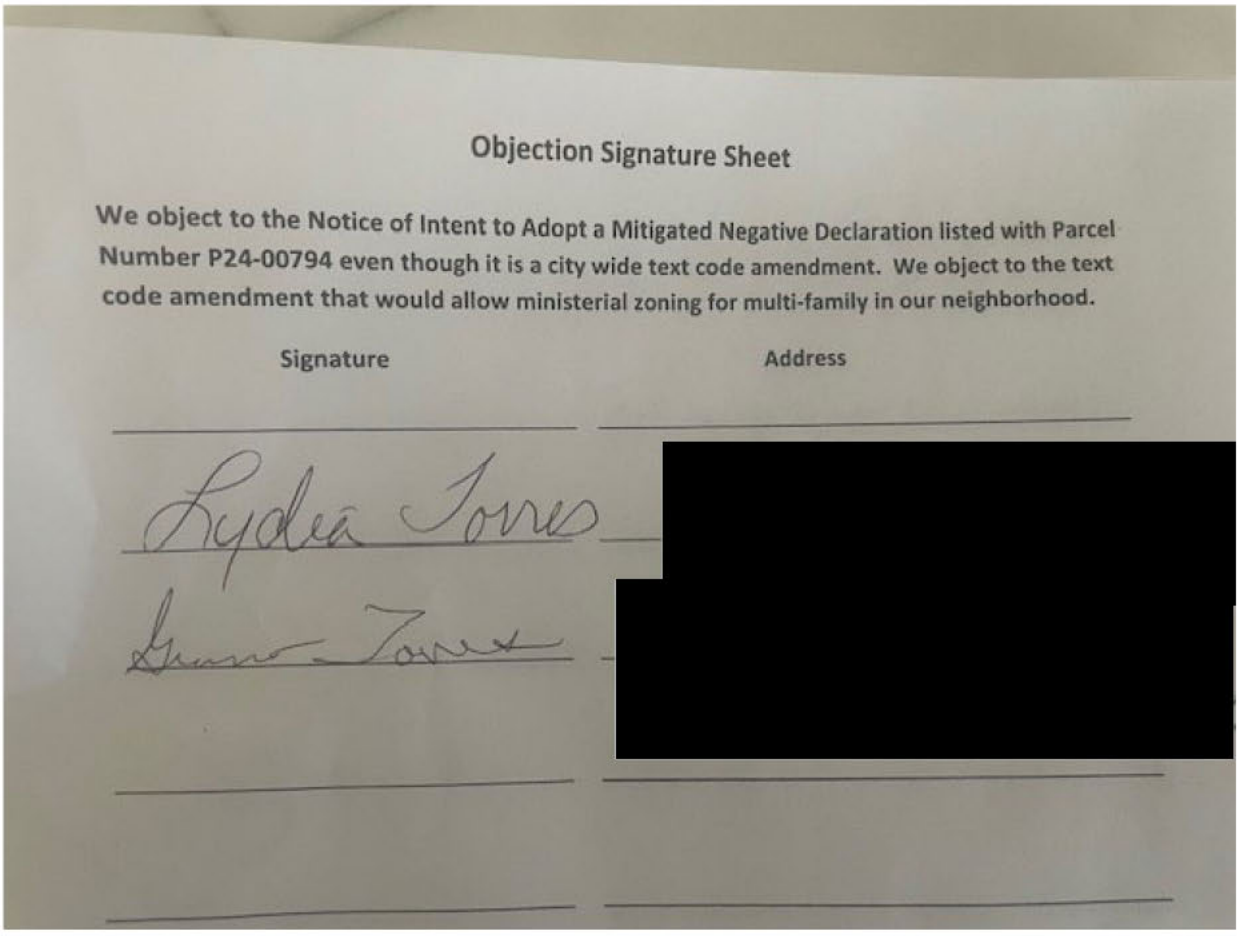
External Email: Use caution with links and attachments



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| Signature | Address |
| --- | --- |
| Lydia Torres | [redacted] |
| Gino Torres | |
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| Signature | Address |
|---|---|
| JoAnn Hrapton | [redacted] |
| Paul W Bowen | [redacted] |
| Eyvonne Malm | [redacted] |
| William Day | [redacted] |
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| --- | --- |
| | [redacted] |
| | [redacted] |
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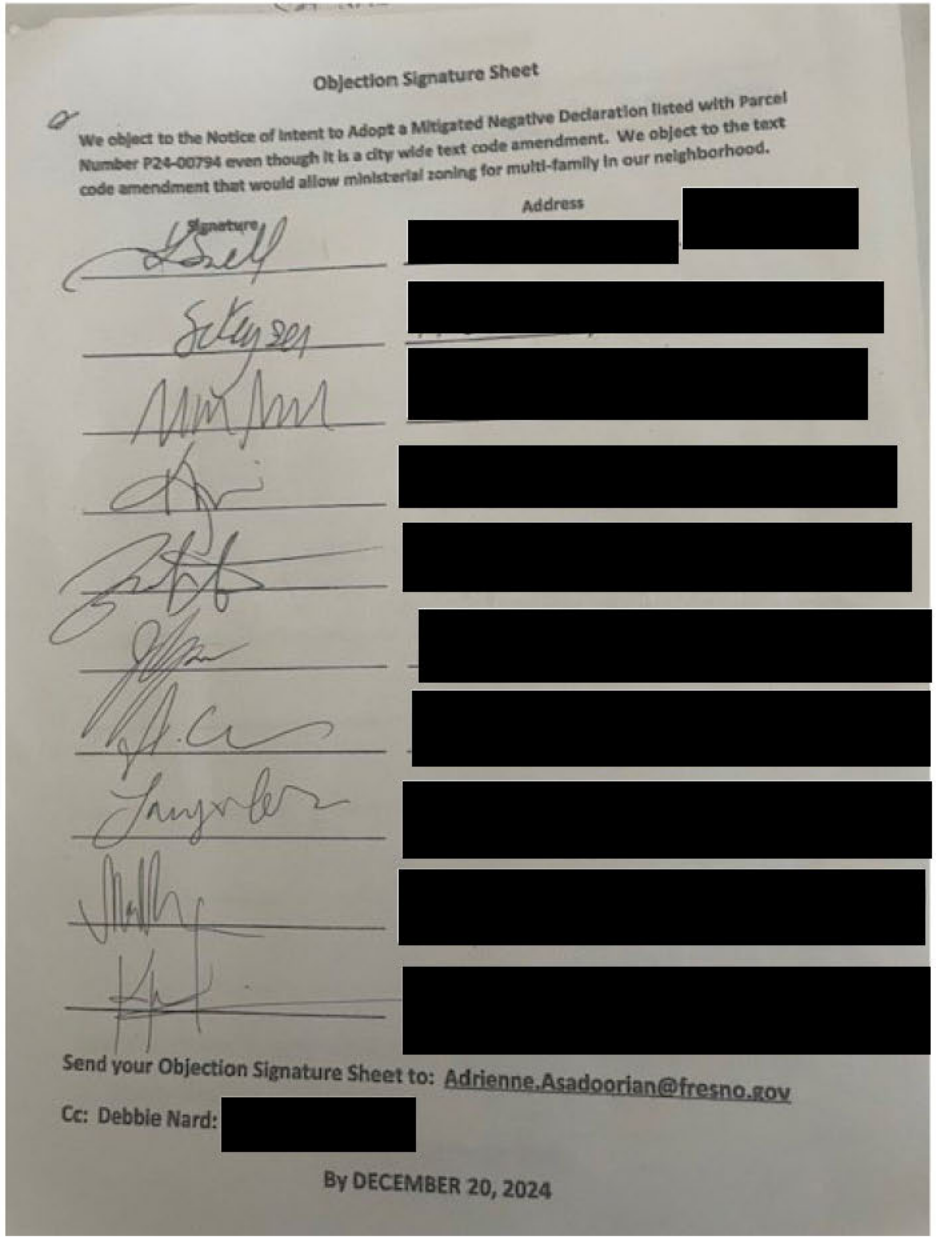
| Signature | Address |
|---|---|
| [illegible] | [redacted] |
| Debbie DeSoto | [redacted] |
| [illegible] | [redacted] |
| Diane C Stevens | [redacted] |
| [illegible] | [redacted] |
| Ann M Mach | [redacted] |
| | |



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Signature | Address

[redacted]

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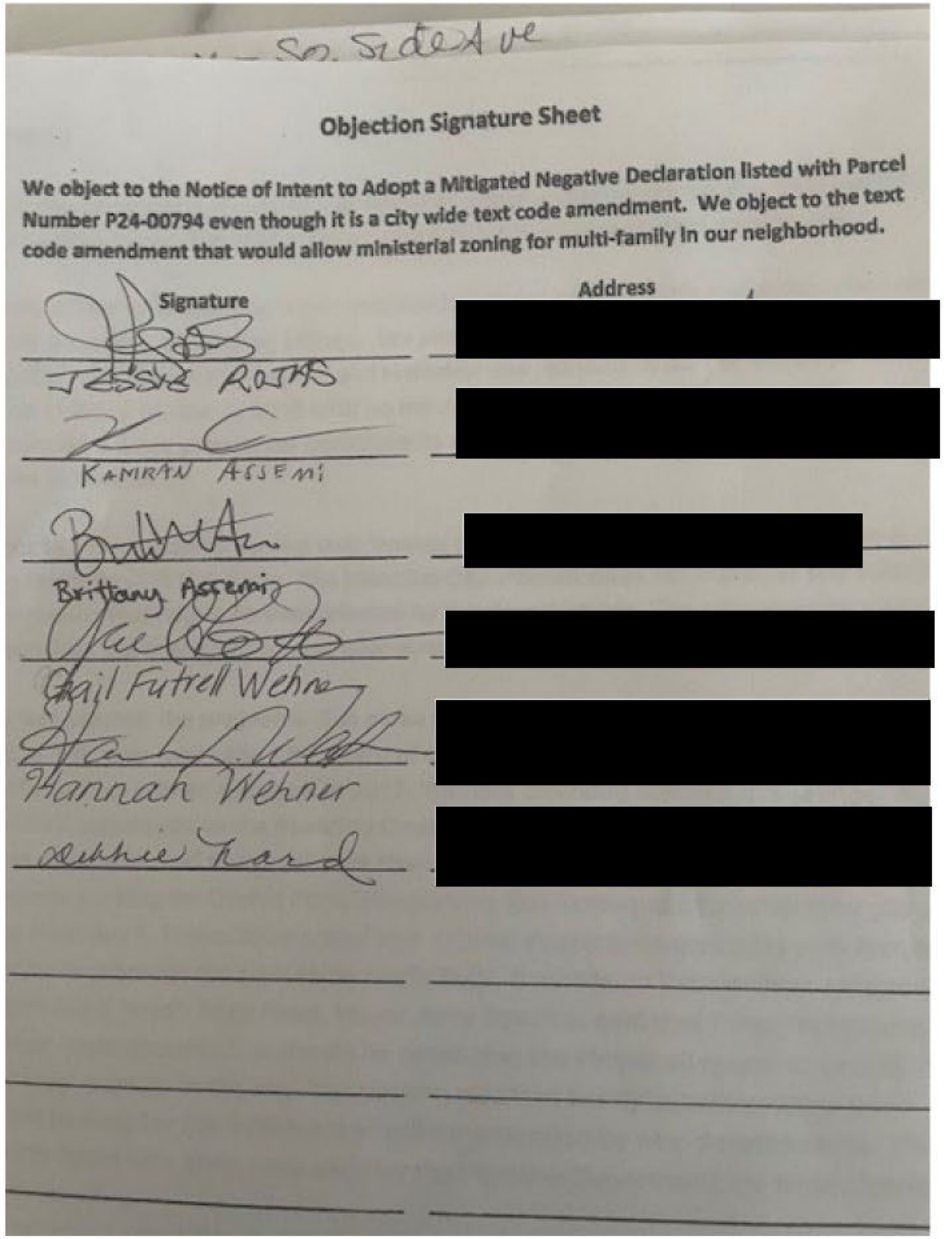
Cc: Debbie Nard: [redacted]

By DECEMBER 20, 2024



So. Side Ave

**Objection Signature Sheet**

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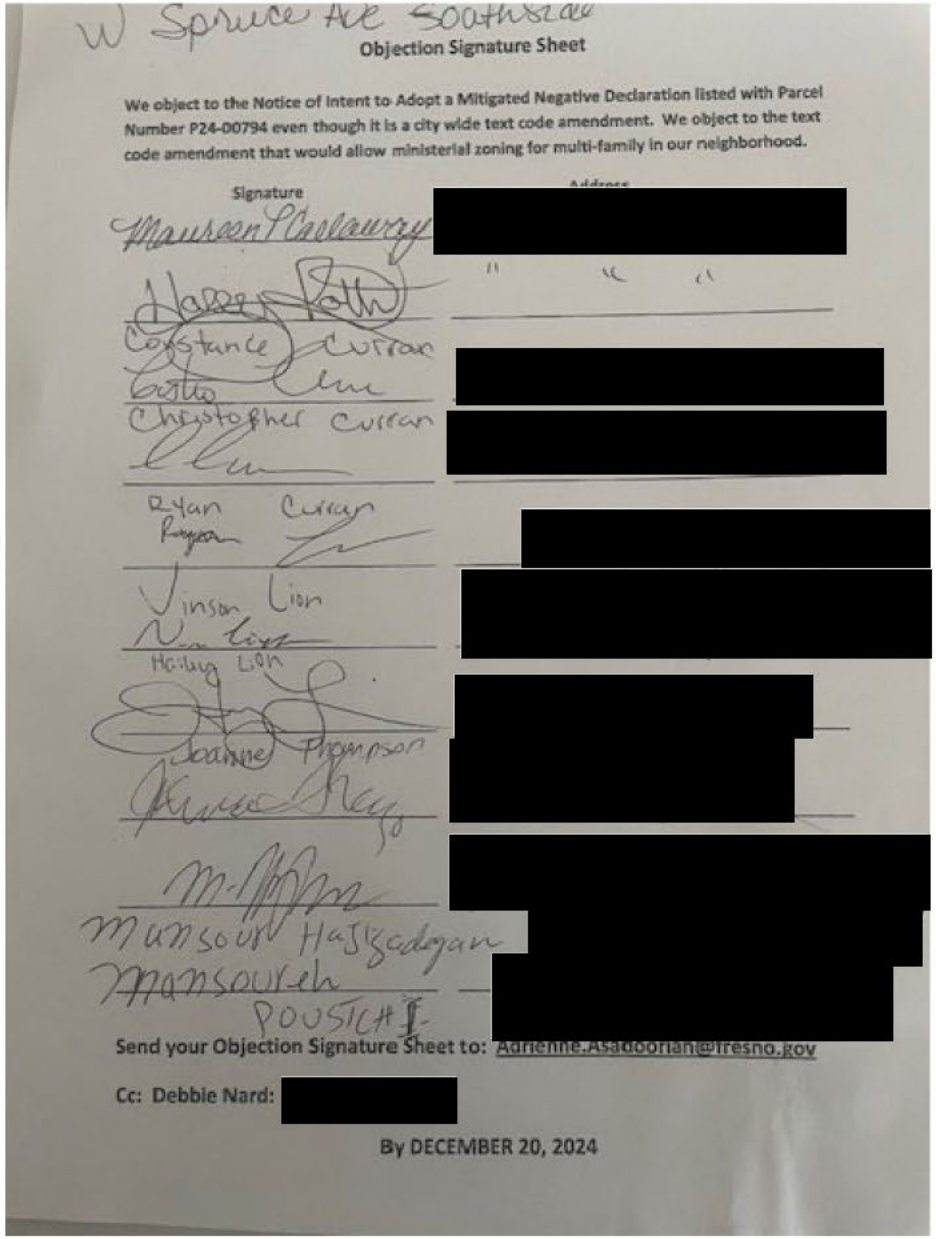
| Signature | Address |
| --- | --- |
| JESSE ROJAS | [redacted] |
| KAMRAN ASSEMI | [redacted] |
| Brittany Assemi | [redacted] |
| Gail Futrell Wehner | [redacted] |
| Hannah Wehner | [redacted] |
| Debbie Ward | [redacted] |



W Spruce Ave Southside

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| Signature | Address |
|---|---|
| Maureen P Callaway | [redacted] |
| [illegible] | " " " |
| Constance Curran | [redacted] |
| Christopher Curran | [redacted] |
| Ryan Curran | [redacted] |
| Vinson Lion | [redacted] |
| Hailing Lion | [redacted] |
| Joanne Thompson | [redacted] |
| [illegible] | [redacted] |
| [illegible] | [redacted] |
| Mansour Hajizadegan | [redacted] |
| Mansoureh POUSTCHI | [redacted] |

Send your Objection Signature Sheet to: Adrienne.Asadoorian@fresno.gov

Cc: Debbie Nard: [redacted]

By DECEMBER 20, 2024

Sent from my iPhone

**From:** [redacted]
**To:** Adrienne Asadoorian
**Subject:** Objection letter
**Date:** Thursday, December 19, 2024 3:28:57 PM

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External Email: Use caution with links and attachments

I object to the NOTICE OF INTENT TO ADOPT A MITIGATED NEGATIVE DECLARATION with application number P24-00794 for a citywide text code amendment.

We have been fighting multi family development in our neighborhood for the past four years. A parcel was rezoned for multi family in 2015 during a citywide rezone. This was also done during the Christmas holiday season and approved by the city council in early 2015.

The public was only notified of this amendment in a small ad in the classified section of the Fresno Bee. This may comply with the Municipal Code, but as was pointed out at the City Council meeting last July, most of us do not subscribe to the Bee and fewer read the public notices. The City uses many forms of communication when they want the public to know about something. The Municipal Code should be updated. My husband found this in the Planning Department notices only because he checked on the listed notice. If we had not specifically requested to receive the notices by going down to city hall we never would have known about this.

I further object to the fact that our elected city representatives were aware of this text amendment when we were at the City Council hearing on July 25th of this year. This amendment would totally undermine all of our neighborhood objections on the parcel in question.

We are citizens who have to try to keep track of these things ourselves. We do not have community activists from non profit organizations or non profit legal firms representing us.

I doubt it is just luck that these proposals and meetings almost always coincide with the holidays when they think the public will be busy.

This text amendment went out to the various Project Review Committees in August and September which was shortly after the City Council voted in July. It certainly appears that our elected officials and city management do not want us to find out about these things until it is too late.

We have repeatedly outlined the issues with traffic, parking, inadequate and unworkable roads, and public safety access into the existing neighborhood at peak times. This amendment would eliminate any opposition to zoning changes without consideration of the impact on the neighborhood.

We also highly object to having the representation process eliminated. We worked very hard for our homes. We want our government to be transparent and have our voices heard.

Many recent state policies have been responsible for billions of wasted taxpayer dollars. Many more have not worked. We do not want our neighborhood to be the victim of an unproven state policy that will be PERMANENT once it is adopted. When the obvious problems arise the city officials will throw up their hands and claim unforeseen circumstances.

I would ask you to not approve this text amendment which eliminates the voice of the people in the development process which is already secretive enough.

If this amendment is adopted I would ask that the undeveloped parcels between Marks and Milburn on Herndon Ave be removed or excluded from this amendment.

Thank you for your consideration.
Debbie Nard
Sent from my iPad

OBJECTIONS

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| Lark and Mike Hilliard | [redacted] |
| *Lark Hilliard & Mike Hilliard* | |
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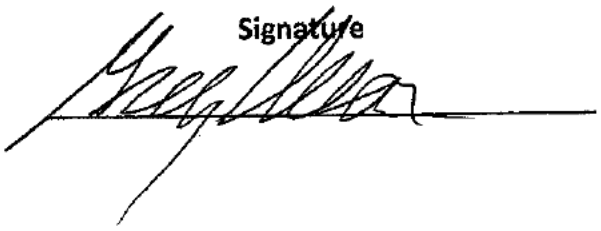
|  | [redacted] |
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**Cc: Debbie Nard:** [redacted]

**By DECEMBER 20, 2024**

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| Signature | Address |
|---|---|
| [redacted] | [redacted] |
| Cheryl Cerniglia | [redacted] |
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| [redacted] | [redacted] |
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| Signature | Address |
|---|---|
| [redacted] | [redacted] |
| Tracy Hansen | [redacted] |
| [redacted] | [redacted] |
| [redacted] | [redacted] |
| [redacted] | [redacted] |
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| Signature | Address |
|---|---|
| Linda Tulkerson | [redacted] |
| Pam Tulkerson | [redacted] |
| [redacted] | [redacted] |
| [redacted] | [redacted] |
| [redacted] | [redacted] |
| [redacted] | [redacted] |
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|---|---|
| [redacted] | [redacted] |
| [redacted] | [redacted] |
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## Objection Signature Sheet

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| Signature | Address |
| --- | --- |
| Marvel Caiati | [redacted] |
| [redacted] | [redacted] |
| Diane Hurst | [redacted] |
| Debbie Vickers | [redacted] |
| [redacted] | [redacted] |
| Daniel Gatin | [redacted] |
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**Send your Objection Signature Sheet to: Adrienne.Asadoorian@fresno.gov**

**Cc: Debbie Nard:** [redacted]

**By DECEMBER 20, 2024**

**From:** [redacted]
**To:** Adrienne Asadoorian
**Subject:** Objection to Notice of Intent to Adopt a Mitigated Negative Declaration P-2400794
**Date:** Thursday, December 19, 2024 9:48:32 PM

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**External Email:** Use caution with links and attachments

I am objecting to this proposal as it will remove the opportunity to voice our legitimate concerns regarding infrastructure, traffic, parking and public safety on the parcels deemed eligible by the proposal.
The community where my husband and I have lived for several years has recently navigated the process of having a property rezoned without our community's knowledge. When the proposed development for the rezoned property was made public, the neighbors voiced their concerns regarding infrastructure, traffic and public safety in front of the Fresno Planning Commission and The Fresno City Council. Both voted against the proposed development. During this process, the city management refused to come out to look at the traffic congestion after being asked to do so by the neighbors.
The public's input is necessary to ensure responsible development and those neighbors living in the potentially impacted communities have their voices heard!!!!
I would ask that this proposal be denied in total, or at least remove the properties on Herndon between Marks and Millburn from the list of properties eligible for this action.
Respectfully submitted,
Paula Moradian

**From:** [redacted]
**To:** Adrienne Asadoorian
**Cc:** [redacted]
**Subject:** Objection to Notice of Intent to Adopt a Mitigated Negative Declaration P-2400794
**Date:** Wednesday, December 18, 2024 8:51:10 PM

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External Email: Use caution with links and attachments

I am objecting to this proposal as it is yet another measure that will reduce local control over building in the various parts of the city. This proposal would effectively eliminate the input from neighboring properties on the parcels deemed eligible by this proposal.

Just in my neighborhood there are parcels that have been requested for rezone to build housing. The neighbors have raised their objections due to lack of infrastructures in the area. There is currently litigation over one development. This proposal would effectively overturn the decision from the Project Review Committee, the Planning Commission, and the City Council.

The Planning Department never considers the impact on the surrounding properties in making their determinations. By allowing housing development on property zoned office invites a multitude of problems with traffic, parking, and public safety.

I would ask that this proposal be denied in total, or at least remove the properties on Herndon between Marks and Milburn from the list of properties eligible for this action.
Thank you for your consideration.
Dennis Nard.
Sent from my iPad

OBJECTIONS

We would like to object to the Notice of Intent to Adopt a Mitigated Negative Declaration listed with Parcel Number P24-00794 even though it is a city wide text code amendment.

This would affect three parcels in our neighborhood that are currently zoned for office and potentially a number of existing offices. We already have one parcel zoned for high density multi family. This parcel at Prospect and Herndon was rezoned as part of the 2030 rezone during the Holiday Season in 2015 with no input from nearby residents.
Steve Brandau did not protect his constituents with provisions to revisit parking and density like were done in District 6.

We object to the ministerial zoning that "meets the City's development code." There is no planning involved with this code. The Planning Department does not consider any existing or future problems that might be exacerbated by the development. The planners and city council do not consider the preservation and character of the neighborhood.

The City has created the problems that make multi family development in this neighborhood impractical. We have made the City aware of these problems on NUMEROUS occasions starting with emails to Councilman Karbassi in 2019. We have attended numerous meetings. We delivered 929 signatures to the Planning Department on 9/20/21 and again in May 2024. These signatures were attached to a document that noted:

1) Inadequate parking for Orchid Park. The parking was inadequate for what they planned the park to be from day 1. It should be noted that original property owners paid park fees and had to wait 10 or more years for the park to be finally built. Councilman Karbassi has acknowledged this problem but it hasn't been fixed. Mayor Jerry Dyer has said that these "neighborhood parks have become regional parks." It should be noted that the Pickleball courts at Orchid Park are one of the most popular in the city. The parking lot often barely accommodates this.

2) No street parking for the vehicles that will be generated by new developments. The parking requirements listed by a state code used by the Planning Department are totally inadequate for multi family housing.

3) The small short street (Prospect) with the POORLY DESIGNED ROUNDABOUT and unworkable traffic flow on one of the two access roads into the neighborhood. The city has long promised to run Fir through to Valentine Avenue when they build the park. It was promised again when Leo Wilson built a large housing development adjacent to the park. Just this year it was considered but then cancelled by Councilman Karbassi at the budget hearing. Jerry Dyer now says those promises from the city are "too old."

4) Altered traffic patterns throughout the neighborhood as a result of people avoiding Prospect

and using Brawley Avenue instead. Again the city is adding higher density on each parcel leading to roads through the neighborhood that were not designed to handle that traffic. With each new development the quality of life in the existing neighborhood has deteriorated.

5) School safety. There should be a direct path from both the existing new developments and the proposed new ones for children to walk to their elementary school. The City Manager, Georgeanne White says that, "they are not required to provide one." The neighborhood is already choked with traffic at peak pick up and drop off times. It is not safe for children to navigate alone which generates even more traffic.

6) Public Safety Vehicles. Ambulance and Fire Department vehicles have trouble navigating the roundabout and when Valentine is clogged with traffic, they cannot access the neighborhood NOW.

7) Noise and Air Pollution. Herndon is exponentially busier than it was when the neighborhood was developed. There is a lot more noise that can be heard from blocks away. Sirens, gunning engines, and just the heavier traffic can be heard blocks away.

8) Ingress and egress. The City is allowing ingress and egress on the two main feeder streets on proposed plans for new developments. This will exacerbate the congestion on these streets at peak times and cause traffic to back up onto Herndon Avenue.

We are aware that the STATE OF CALIFORNIA is pushing this along with many other policies that DO NOT WORK. These proposed developments will be permanent once they are built no matter what problems they cause.

If this amendment is such a good idea, why has the City gone to such great lengths to keep this from the public. When Councilman Karbassi was asked about this notice the response was "was this something you received in the mail?" We never received any answer as to what this was going to do.

The City has refused to keep their promises. They refuse to fix the problems brought forth to them. They definitely are not transparent in their actions.

High density multi family housing has already been rejected by the Project Review Committee, the Planning Commission, and by the City Council. This amendment would basically overturn those decisions and ruin a neighborhood that already has all types of housing. This amendment would negate the will of the people who have already prevailed on this issue despite a secretive, abusive, and uneven playing ground.

As this amendment will further erode the public's right to participate in addressing development in their own communities it should be denied.

## Objection Signature Sheet

We object to the Notice of Intent to Adopt a Mitigated Negative Declaration listed with Parcel Number P24-00794 even though it is a city wide text code amendment. We object to the text code amendment that would allow ministerial zoning for multi-family in our neighborhood.

| Signature | Address |
| --- | --- |
| Peggy Pedersen | [redacted] |
| Paul Peder | [redacted] |
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Send your Objection Signature Sheet to: Adrienne.Asadoorian@fresno.gov

Cc: Debbie Nard: [redacted]

By DECEMBER 20, 2024

**From:** [redacted]
**To:** Adrienne Asadoorian
**Subject:** Objection to the Notice of Intent to Adopt a Mitigated Negative Declaration listed with Parcel Number P24-00794
**Date:** Friday, December 20, 2024 2:30:47 PM

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**External Email:** Use caution with links and attachments

Dear Adrienne

My wife and I are objecting to the Notice of Intent to Adopt a Mitigated Negative Declaration listed
with Parcel Number P 2 4 - 0 0 7 9 4 even though it is a city wide text code amendment.

This text code amendment would affect *three* parcels in our neighborhood that are currently zoned for office space.

We already have one parcel zoned for high density, multi family. This parcel at Prospect and Herndon was rezoned as part of the 20-30 rezone
during the Holiday Season in 2015 with no input from nearby residents.

We object to the ministerial zoning that "meets the City's development code."

- **There is no planning involved with this code.**
- **The Planning Department does not consider any existing or future problems that might be exacerbated by the development.**
- **The planners and city council do not consider the preservation and character of the neighborhood.**

The City has created the problems that make multifamily development in our neighborhood
impractical.

The following issues were pointed out to the Planning Department regarding proposed high density housing on Parcel Number P24 –

00794:

1) Inadequate parking for Orchid Park. The parking was inadequate for what they planned the
park to be from day 1. It should be noted that original property owners paid park fees and had to
wait 10 or more years for the park to be finally built. Councilman Karbassi has acknowledged
this problem but it hasn't been fixed. Mayor Jerry Dyer has said that these "neighborhood parks
have become regional parks." It should be noted that the Pickleball courts at Orchid Park are
one of the most popular in the city. The parking lot often barely accommodates this.

2) No street parking for the vehicles that will be generated by new developments. The parking
requirements listed by a state code used by the Planning Department are totally inadequate for
multifamily housing:

3) The small short street (Prospect) with the POORLY DESIGNED ROUNDABOUT and
unworkable traffic flow on one of the two access roads into the neighborhood. The city has long
promised to run Fir through to Valentine Avenue when they build the park. It was promised again
when Leo Wilson built a large housing development adjacent to the park. Just this year it was
considered but then cancelled by Councilman Karbassi at the budget hearing. Jerry Dyer now
says those promises from the city are "too old."

4) Altered traffic patterns throughout the neighborhood as a result of people avoiding Prospect
and using Brawley Ave instead. Again, the city is adding higher density on each parcel
leading to roads through the neighborhood that were not designed to

handle that traffic. With
each new development the quality of life in the existing neighborhood has deteriorated.

5) School safety. There should be a direct path from both the existing new developments and
the proposed new ones for children to walk to their elementary school. The City Manager,
Georgeanne White says that, "they are not required to provide one." The neighborhood is
already choked with traffic at peak pick up and drop off times. It is not safe for children to
navigate alone which generates even more traffic.

6) Public Safety Vehicles . Ambulance and Fire Department vehicles have trouble navigating the
roundabout and when Valentine is clogged with traffic, they cannot access the neighborhood
NOW.

7) Noise and Air Pollution. Herndon is exponentially busier than it was when the neighborhood
was developed. There is a lot more noise that can be heard from blocks away. Sirens, gunning
engines, and just the heavier traffic can be heard blocks away.

8) Ingress and egress. The City is allowing ingress and egress on the two main feeder streets on
proposed plans for new developments. This will exacerbate the congestion on these streets at
peak times and cause traffic to back up onto Herndon Avenue.

We are aware that the STATE OF CALIFORNIA is pushing this along with many other policies that
DO NOT WORK. These proposed developments will be permanent once they are built no matter
what problems they cause.

High density, multi-family housing has already been rejected by the Project Review Committee,
the Planning Commission, and by the City Council. This amendment would basically overturn
those decisions and ruin a neighborhood that already has apartments, townhomes and single family housing. This amendment
would negate the will of the people who have already prevailed on this issue.

This amendment will further erode the public's right to participate in addressing development
in their neighborhoods and should be denied.

Best regards

**Scott Nichols and Janet Nichols**
[redacted]

**EMAIL:** [redacted]

**Subject:** Formal Objection to Proposed Zoning Changes (Parcel Number P24-00794)

To: Adrienne.Asadoorian@fresno.gov

I am writing to formally object to the Notice of Intent to Adopt a Mitigated Negative Declaration related to Parcel Number P24-00794, which is part of a citywide text code amendment. While this amendment affects multiple areas, its implications for our neighborhood are particularly concerning.

This amendment targets three parcels currently zoned for office use and potentially others, in addition to the one parcel already rezoned for high-density multifamily housing at Prospect and Herndon. That rezoning occurred during the 2015 holiday season with little to no input from affected residents. Unlike other districts, such as District 6, this area lacks adequate protections for parking and density concerns, leaving the community vulnerable to overdevelopment.

## Specific Concerns:

1. **Lack of Planning and Neighborhood Consideration**:
   - Ministerial zoning that "meets the City's development code" disregards the unique needs and existing challenges in our neighborhood.
   - There has been no effort to consider how this amendment exacerbates ongoing issues such as traffic congestion, safety, and quality of life.
2. **Broken Promises and Community Frustration**:
   - Despite numerous emails, meetings, and petitions—most notably 929 signatures submitted in September 2021 and May 2024—the City has not addressed longstanding issues, including inadequate parking at Orchid Park, poor road infrastructure, and insufficient traffic mitigation measures.
3. **Traffic and Safety Concerns**:
   - The poorly designed roundabout on Prospect Street, coupled with inadequate access roads, already causes significant congestion. Increased density will only worsen these conditions.
   - There is no safe path for children walking to the local elementary school, further endangering students during peak traffic times.
   - Emergency vehicles such as ambulances and fire trucks struggle to navigate the neighborhood's current infrastructure.
4. **Environmental and Quality-of-Life Impacts**:
   - Increased noise and air pollution due to heavy traffic on Herndon Avenue directly affect residents' well-being.
   - The City's allowance for ingress and egress onto main feeder streets will further congest these roads and create backups onto Herndon.
5. **Lack of Transparency and Public Engagement**:
   - The City has failed to provide clear and timely communication about this amendment, raising concerns about its commitment to transparency.
   - High-density housing proposals have previously been rejected by the Project Review Committee, Planning Commission, and City Council. This amendment would overturn those decisions, disregarding the will of the community.

## Conclusion:

This amendment undermines the public's right to participate in decisions about their neighborhoods and disregards the valid concerns of residents who have fought for responsible development. The proposed changes would impose permanent, detrimental impacts on our community; further eroding trust in the City's planning process.

I respectfully urge the City to reject this amendment. It is imperative that community voices are considered, and that thoughtful, transparent planning takes precedence over rushed policies.

Thank you for your attention to this matter.

Sincerely,

Name: DENNIS PERKINS

Address: [redacted]

## Objection Signature Sheet

We object to the Notice of Intent to Adopt a Mitigated Negative Declaration listed with Parcel Number P24-00794 even though it is a city wide text code amendment. We object to the text code amendment that would allow ministerial zoning for multi-family in our neighborhood.

| Signature | Address |
| --- | --- |
| DORIS ANN SWAIM | [redacted] |
| MARK SWAIM | [redacted] |
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Send your Objection Signature Sheet to: Adrienne.Asadoorian@fresno.gov

Cc: Debbie Nard: [redacted]

By DECEMBER 20, 2024

To whom it may concern,

We would like to object to the Notice of Intent to Adopt a Mitigated Negative Declaration listed with Parcel Number P24-00794 even though it is a city wide text code amendment.

This would affect three parcels in our neighborhood that are currently zoned for office and potentially a number of existing offices. We already have one parcel zoned for high density multi family. This parcel at Prospect and Herndon was rezoned as part of the 2030 rezone during the Holiday Season in 2015 with no input from nearby residents.

Steve Brandau did not protect his constituents with provisions to revisit parking and density like were done in District 6.

We object to the ministerial zoning that "meets the City's development code." There is no planning involved with this code. The Planning Department does not consider any existing or future problems that might be exacerbated by the development. The planners and city council do not consider the preservation and character of the neighborhood.

The City has created the problems that make multi family development in this neighborhood impractical. We have made the City aware of these problems on NUMEROUS occasions starting with emails to Councilman Karbassi in 2019. We have attended numerous meetings. We delivered 929 signatures to the Planning Department on 9/20/21 and again in May 2024. These signatures were attached to a document that noted:

1. Inadequate parking for Orchid Park. The parking was inadequate for what they planned the park to be from day 1. It should be noted that original property owners paid park fees and had to wait 10 or more years for the park to be finally built. Councilman Karbassi has acknowledged this problem but it hasn't been fixed. Mayor Jerry Dyer has said that these "neighborhood parks have become regional parks." It should be noted that the Pickleball courts at Orchid Park are one of the most popular in the city. The parking lot often barely accommodates this.

2. No street parking for the vehicles that will be generated by new developments. The parking requirements listed by a state code used by the Planning Department are totally inadequate for multi family housing;

3. The small short street (Prospect) with the POORLY DESIGNED ROUNDABOUT and unworkable traffic flow on one of the two access roads into the neighborhood. The city has long promised to run Fir through to Valentine Avenue when they build the park. It was promised again when Leo Wilson built a large housing development adjacent to the park. Just this year it was considered but then canceled by Councilman Karbassi at the budget hearing. Jerry Dyer now says those promises from the city are "too old."

4. Altered traffic patterns throughout the neighborhood as a result of people avoiding Prospect and using Brawley Avenue instead. Again the city is adding higher density on each parcel leading to roads through the neighborhood that were not designed to handle that traffic. With each new development the quality of life in the existing neighborhood has deteriorated.

5. School safety. There should be a direct path from both the existing new developments and the proposed new ones for children to walk to their elementary school. The City Manager, Georgeanne White says that, "they are not required to provide one." The neighborhood is already choked with traffic at peak pick up and drop off times. It is not safe for children to navigate alone which generates even more traffic.

6. Public Safety Vehicles. Ambulance and Fire Department vehicles have trouble navigating the roundabout and when Valentine is clogged with traffic, they cannot access the neighborhood NOW.

7. Noise and Air Pollution. Herndon is exponentially busier than it was when the neighborhood was developed. There is a lot more noise that can be heard from blocks away. Sirens, gunning engines, and just the heavier traffic can be heard blocks away.

8. Ingress and egress. The City is allowing ingress and egress on the two main feeder streets on proposed plans for new developments. This will exacerbate the congestion on these streets at peak times and cause traffic to back up onto Herndon Avenue.

We are aware that the STATE OF CALIFORNIA is pushing this along with many other policies that DO NOT WORK. These proposed developments will be permanent once they are built no matter what problems they cause.

If this amendment is such a good idea, why has the City gone to such great lengths to keep this from the public. When Councilman Karbassi was asked about this notice the response was "was this something you received in the mail?" We never received any answer as to what this was going to do.

The City has refused to keep their promises. They refuse to fix the problems brought forth to them. They definitely are not transparent in their actions.

High density multi family housing has already been rejected by the Project Review Committee, the Planning Commission, and by the City Council. This amendment would basically overturn those decisions and ruin a neighborhood that already has all types of housing. This amendment would negate the will of the people who have already prevailed on this issue despite a secretive, abusive, and uneven playing ground.

As this amendment will further erode the public's right to participate in addressing development in their own communities it should be denied.

Thank you for your time,



Eugene Savarino & Lauren Savarino

[redacted]

**Subject:** Formal Objection to Proposed Zoning Changes (Parcel Number P24-00794)

To: Adrienne.Asadoorian@fresno.gov

I am writing to formally object to the Notice of Intent to Adopt a Mitigated Negative Declaration related to Parcel Number P24-00794, which is part of a citywide text code amendment. While this amendment affects multiple areas, its implications for our neighborhood are particularly concerning.

This amendment targets three parcels currently zoned for office use and potentially others, in addition to the one parcel already rezoned for high-density multifamily housing at Prospect and Herndon. That rezoning occurred during the 2015 holiday season with little to no input from affected residents. Unlike other districts, such as District 6, this area lacks adequate protections for parking and density concerns, leaving the community vulnerable to overdevelopment.

## Specific Concerns:

1. **Lack of Planning and Neighborhood Consideration**:
   - Ministerial zoning that "meets the City's development code" disregards the unique needs and existing challenges in our neighborhood.
   - There has been no effort to consider how this amendment exacerbates ongoing issues such as traffic congestion, safety, and quality of life.
2. **Broken Promises and Community Frustration**:
   - Despite numerous emails, meetings, and petitions—most notably 929 signatures submitted in September 2021 and May 2024—the City has not addressed longstanding issues, including inadequate parking at Orchid Park, poor road infrastructure, and insufficient traffic mitigation measures.
3. **Traffic and Safety Concerns**:
   - The poorly designed roundabout on Prospect Street, coupled with inadequate access roads, already causes significant congestion. Increased density will only worsen these conditions.
   - There is no safe path for children walking to the local elementary school, further endangering students during peak traffic times.
   - Emergency vehicles such as ambulances and fire trucks struggle to navigate the neighborhood's current infrastructure.
4. **Environmental and Quality-of-Life Impacts**:
   - Increased noise and air pollution due to heavy traffic on Herndon Avenue directly affect residents' well-being.
   - The City's allowance for ingress and egress onto main feeder streets will further congest these roads and create backups onto Herndon.
5. **Lack of Transparency and Public Engagement**:
   - The City has failed to provide clear and timely communication about this amendment, raising concerns about its commitment to transparency.
   - High-density housing proposals have previously been rejected by the Project Review Committee, Planning Commission, and City Council. This amendment would overturn those decisions, disregarding the will of the community.

## Conclusion:

This amendment undermines the public's right to participate in decisions about their neighborhoods and disregards the valid concerns of residents who have fought for responsible development. The proposed changes would impose permanent, detrimental impacts on our community; further eroding trust in the City's planning process.

I respectfully urge the City to reject this amendment. It is imperative that community voices are considered, and that thoughtful, transparent planning takes precedence over rushed policies.

Thank you for your attention to this matter.

Sincerely,

Name: _____ Address: [redacted]

Name: _____ Address: [redacted]

Name: _____ Address: [redacted]

Name: _____ Address: _____

Name: _____ Address: _____

Name: _____ Address: _____

Name: _____ Address: _____

Name: _____ Address: _____

Name: _____ Address: _____

Name: _____ Address: _____

Name: _____ Address: _____

2907 S. Maple Avenue
Fresno, California 93725-2208
Telephone: (559) 233-7161
Fax: (559) 233-8227

**CONVEYANCE. COMMITMENT. CUSTOMER SERVICE.**

December 3, 2024

Adrienne Asadoorian
Planning and Development
City of Fresno
2600 Fresno Street, Third Floor
Fresno, CA 93721

RE: Text Amendment Application P24-00794

Dear Ms. Asadoorian:

The Fresno Irrigation District (FID) has reviewed Text Amendment Application P24-00794 which proposes an amendment to approve proposed office to dwelling conversion in the O zone district within existing buildings, multi-unit residential development in the RM-1, RM-2, and RM-3 zone districts (housing near bus stops), multi-unit residential uses in NMX, CMX, RMX, CMS, and CR zone districts (infill residential development in mixed use zones), new standalone multi-unit residential development in the O zone district (new residential development on office parcels). FID has the following comments and conditions:

**Summary of Development Requirements Impacting FID Facilities:**

- Review and Approval of all Plans/Maps
- Grant of Easement(s)
- Canal Bank/Pipeline Improvements
- Execute additional Agreement(s), if necessary
- Project Fees
- No Encroachments (i.e. trees, monuments, fences, PUE, etc.)

1. FID does not object to the amendment provided the City continues to require/support FID development requirements when impacted. FID would strongly oppose any amendment that would limit/restrict or otherwise hinder its ability to protect, utilize and maintain its facilities.

2. The proposed broadening of residential development may negatively impact local groundwater supplies. Under current circumstances the City of Fresno area is experiencing a modest but continuing groundwater overdraft. Should the proposed expansion of residential development result in a conversion from imported surface water to groundwater, this deficit will increase. FID suggests the City of Fresno require the residential developments balance anticipated groundwater use with sufficient recharge of imported surface water in order to preclude increasing the area's existing groundwater overdraft.



BOARD OF DIRECTORS President RYAN JACOBSEN Vice-President JERRY PRIETO, JR. CHRISTOPHER WOOLF
GEORGE PORTER GREGORY BEBERIAN General Manager BILL STRETCH

3. California enacted landmark legislation in 2014 known as the Sustainable Groundwater Management Act (SGMA). The act requires the formation of local groundwater sustainability agencies (GSAs) that must assess conditions in their local water basins and adopt locally-based management plans. FID and the City of Fresno are members of the North Kings Groundwater Sustainability Agency which will manage the groundwater basin within the FID service area. This area is completely reliant on groundwater pumping and SGMA will impact all users of groundwater and those who rely on it. The City of Fresno should consider the impacts of broadening residential development on the City's ability to comply with requirements of SGMA.

Thank you for submitting this for our review. We appreciate the opportunity to review and comment on the subject documents for the proposed project. If you have any questions, please feel free to contact Chris Lundeen at (559) 233-7161 extension 7410 or clundeen@fresnoirrigation.com.

Sincerely,

Laurence Kimura, P.E.
Chief Engineer

Attachment

OBJECTIONS

We would like to object to the Notice of Intent to Adopt a Mitigated Negative Declaration listed with Parcel Number P24-00794 even though it is a city wide text code amendment.

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## Objection Signature Sheet

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| Signature | Address |
|---|---|
| Jeff and Valerie Dahl | [redacted] |
| Valerie Dahl | |
| Lark and Mike Hilliard | [redacted] |
| Lark Hilliard & Mike Hilliard | |
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**Send your Objection Signature Sheet to: Adrienne.Asadoorian@fresno.gov**

**Cc: Debbie Nard: [redacted]**

**By DECEMBER 20, 2024**

OBJECTIONS

We would like to object to the Notice of Intent to Adopt a Mitigated Negative Declaration listed with Parcel Number P24-00794 even though it is a city wide text code amendment.

This would affect three parcels in our neighborhood that are currently zoned for office and potentially a number of existing offices. We already have one parcel zoned for high density multi family. This parcel at Prospect and Herndon was rezoned as part of the 2030 rezone during the Holiday Season in 2015 with no input from nearby residents.
Steve Brandau did not protect his constituents with provisions to revisit parking and density like were done in District 6.

We object to the ministerial zoning that "meets the City's development code." There is no planning involved with this code. The Planning Department does not consider any existing or future problems that might be exacerbated by the development. The planners and city council do not consider the preservation and character of the neighborhood.

The City has created the problems that make multi family development in this neighborhood impractical. We have made the City aware of these problems on NUMEROUS occasions starting with emails to Councilman Karbassi in 2019. We have attended numerous meetings. We delivered 929 signatures to the Planning Department on 9/20/21 and again in May 2024. These signatures were attached to a document that noted:

1) Inadequate parking for Orchid Park. The parking was inadequate for what they planned the park to be from day 1. It should be noted that original property owners paid park fees and had to wait 10 or more years for the park to be finally built. Councilman Karbassi has acknowledged this problem but it hasn't been fixed. Mayor Jerry Dyer has said that these "neighborhood parks have become regional parks." It should be noted that the Pickleball courts at Orchid Park are one of the most popular in the city. The parking lot often barely accommodates this.

2) No street parking for the vehicles that will be generated by new developments. The parking requirements listed by a state code used by the Planning Department are totally inadequate for multi family housing.

3) The small short street (Prospect) with the POORLY DESIGNED ROUNDABOUT and unworkable traffic flow on one of the two access roads into the neighborhood. The city has long promised to run Fir through to Valentine Avenue when they build the park. It was promised again when Leo Wilson built a large housing development adjacent to the park. Just this year it was considered but then cancelled by Councilman Karbassi at the budget hearing. Jerry Dyer now says those promises from the city are "too old."

4) Altered traffic patterns throughout the neighborhood as a result of people avoiding Prospect

and using Brawley Avenue instead. Again the city is adding higher density on each parcel leading to roads through the neighborhood that were not designed to handle that traffic. With each new development the quality of life in the existing neighborhood has deteriorated.

5) School safety. There should be a direct path from both the existing new developments and the proposed new ones for children to walk to their elementary school. The City Manager, Georgeanne White says that, "they are not required to provide one." The neighborhood is already choked with traffic at peak pick up and drop off times. It is not safe for children to navigate alone which generates even more traffic.

6) Public Safety Vehicles. Ambulance and Fire Department vehicles have trouble navigating the roundabout and when Valentine is clogged with traffic, they cannot access the neighborhood NOW.

7) Noise and Air Pollution. Herndon is exponentially busier than it was when the neighborhood was developed. There is a lot more noise that can be heard from blocks away. Sirens, gunning engines, and just the heavier traffic can be heard blocks away.

8) Ingress and egress. The City is allowing ingress and egress on the two main feeder streets on proposed plans for new developments. This will exacerbate the congestion on these streets at peak times and cause traffic to back up onto Herndon Avenue.

We are aware that the STATE OF CALIFORNIA is pushing this along with many other policies that DO NOT WORK. These proposed developments will be permanent once they are built no matter what problems they cause.

If this amendment is such a good idea, why has the City gone to such great lengths to keep this from the public. When Councilman Karbassi was asked about this notice the response was "was this something you received in the mail?" We never received any answer as to what this was going to do.

The City has refused to keep their promises. They refuse to fix the problems brought forth to them. They definitely are not transparent in their actions.

High density multi family housing has already been rejected by the Project Review Committee, the Planning Commission, and by the City Council. This amendment would basically overturn those decisions and ruin a neighborhood that already has all types of housing. This amendment would negate the will of the people who have already prevailed on this issue despite a secretive, abusive, and uneven playing ground.

As this amendment will further erode the public's right to participate in addressing development in their own communities it should be denied.

## Objection Signature Sheet

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**By DECEMBER 20, 2024**

December 11, 2024

Larry Fleming
[redacted]

**To; Adrienne Asadoorian, City of Fresno**

I would like to object to the Notice of Intent to Adopt a Mitigated Negative Declaration listed with Parcel Number P24-00794 even though it is a city-wide text code amendment.

Sierra Sky Park is unique. It is the first community in the United States, ever built around aviation. It was built in 1946, far north of Fresno, with wide open spaces and farmland surrounding it. The founders of Sierra Sky Park built a community that safely promoted aviation and prevented any potential problems with a densely populated urban area**. It is important to remember that Sierra Sky Park was there first.** Fresno has grown over the many years and now borders Sierra Sky Park, slowly and surely encroaching on its way of life; aviation. Although I do not live at Sierra Sky Park, I like airplanes. I love seeing them land and take-off and so do many of my friends. We enjoy the day-to-day operation and events sponsored by the community of Sierra Sky Park. Sierra Sky Park is not just a place for pilots; it is also a place for the general public to watch and enjoy flying; a place where mom and dad take the kids to show them real airplanes, up close. My two sons were even invited to take a flight there when they were young. **Sierra Sky Park is one of Fresno's jewels.**

I am concerned to hear that there is a proposal to rezone land around Sierra Sky Park, which may threaten its operations. If this new zoning plan is approved, I believe it will set the scene for future conflict; expensive lawsuits, complaints, and possible safety issues. It will be a lose/lose situation for the Sky Park, for the residences of any new development, and for the City of Fresno. Why would the City of Fresno consider changing an already adopted land use plan; a costly plan that had been thoroughly studied, agreed upon and makes sense? **There are plenty of other places in our city to build apartments, but there is only one Sierra Sky Park.**

The Community of Sierra Sky Park realizes that the city will continue to grow and that stuff is going to be built around the airport. They only want to make sure that development goes according to the existing land use plan and will not threaten the core of the neighborhood; flying. I urge the City of Fresno to work with the people of Sierra Sky Park and only allow development around the airport that is consistent with the its ability to operate.

Sincerely,
Larry Fleming

**RIVER PARK PROPERTIES III**
Lance-Kashian & Company
265 E. River Park Circle, Suite 420
Fresno, California 93720
Phone (559) 438-4800 Facsimile (559) 438-4802

September 27, 2023 Via: Electronic Mail

Ms. Jennifer Clark, Director
City of Fresno, Development and Resource Management
2600 Fresno Street, Room 3043,
Fresno, CA 93721

**Re: Proposal to Expand Development Code Amendment to Allow Multifamily Housing on Vacant Properties Planned and Zoned for Office Use**

Dear Ms. Clark,

I hope all is good with you as we enter the beautiful Fall weather. It is my understanding that the Development and Resource Management department is initiating a Development Code amendment that would permit multifamily residential development on properties planned and zoned for office uses. As I understand, the amendment is intended to apply to existing vacant office buildings only, and its primary purpose is to increase the availability of much needed housing in our community.

I would respectfully request that you consider expanding this amendment to allow multifamily housing on vacant properties planned and zoned for office uses. As a longtime experienced commercial property developer, owner, and manager and because of progressively changing office work habits and ever improving off-site work technology, I am convinced the City has an overabundance of planned future office space. I sincerely believe this proposal will maximize the use of vacant land and better help the city achieve its General Plan infill and housing goals while significantly reducing vehicle trips and air pollution. We have developed a site plan for a seven-story residential project at the intersection of Friant Road and Fresno Street and I would very much like to meet and present it to you. We understand that our proposal could be viewed as too broad, given the hundreds of vacant acres planned for office use. However, I believe the amendment can be structured to achieve the outcomes described above.

Thank you for your consideration of this request.

Sincerely,

Salvador Gonzales
President

SG/lc

cc: Mr. Edward M. Kashian

**Subject:** Formal Objection to Proposed Zoning Changes (Parcel Number P24-00794)

To: Adrienne.Asadoorian@fresno.gov

I am writing to formally object to the Notice of Intent to Adopt a Mitigated Negative Declaration related to Parcel Number P24-00794, which is part of a citywide text code amendment. While this amendment affects multiple areas, its implications for our neighborhood are particularly concerning.

This amendment targets three parcels currently zoned for office use and potentially others, in addition to the one parcel already rezoned for high-density multifamily housing at Prospect and Herndon. That rezoning occurred during the 2015 holiday season with little to no input from affected residents. Unlike other districts, such as District 6, this area lacks adequate protections for parking and density concerns, leaving the community vulnerable to overdevelopment.

## Specific Concerns:

1. **Lack of Planning and Neighborhood Consideration**:
   - Ministerial zoning that "meets the City's development code" disregards the unique needs and existing challenges in our neighborhood.
   - There has been no effort to consider how this amendment exacerbates ongoing issues such as traffic congestion, safety, and quality of life.
2. **Broken Promises and Community Frustration**:
   - Despite numerous emails, meetings, and petitions—most notably 929 signatures submitted in September 2021 and May 2024—the City has not addressed longstanding issues, including inadequate parking at Orchid Park, poor road infrastructure, and insufficient traffic mitigation measures.
3. **Traffic and Safety Concerns**:
   - The poorly designed roundabout on Prospect Street, coupled with inadequate access roads, already causes significant congestion. Increased density will only worsen these conditions.
   - There is no safe path for children walking to the local elementary school, further endangering students during peak traffic times.
   - Emergency vehicles such as ambulances and fire trucks struggle to navigate the neighborhood's current infrastructure.
4. **Environmental and Quality-of-Life Impacts**:
   - Increased noise and air pollution due to heavy traffic on Herndon Avenue directly affect residents' well-being.
   - The City's allowance for ingress and egress onto main feeder streets will further congest these roads and create backups onto Herndon.
5. **Lack of Transparency and Public Engagement**:
   - The City has failed to provide clear and timely communication about this amendment, raising concerns about its commitment to transparency.
   - High-density housing proposals have previously been rejected by the Project Review Committee, Planning Commission, and City Council. This amendment would overturn those decisions, disregarding the will of the community.

## Conclusion:

This amendment undermines the public's right to participate in decisions about their neighborhoods and disregards the valid concerns of residents who have fought for responsible development. The proposed changes would impose permanent, detrimental impacts on our community; further eroding trust in the City's planning process.
I respectfully urge the City to reject this amendment. It is imperative that community voices are considered, and that thoughtful, transparent planning takes precedence over rushed policies.
Thank you for your attention to this matter.

Sincerely,

Name: Susanne Heskett

Address: [redacted]

**Subject:** Formal Objection to Proposed Zoning Changes (Parcel Number P24-00794)

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Sincerely,

Name: Peter Nunez  Address: [redacted]

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Cc: Debbie Nard: [redacted]

By DECEMBER 20, 2024

**Subject:** Formal Objection to Proposed Zoning Changes (Parcel Number P24-00794)

To: Adrienne.Asadoorian@fresno.gov

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I respectfully urge the City to reject this amendment. It is imperative that community voices are considered, and that thoughtful, transparent planning takes precedence over rushed policies.

Thank you for your attention to this matter.

Sincerely,

Name: MIKE KIDD Address: [redacted]

Name: JANET KIDD Address:

Name: _____ Address: _____

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Name: _____ Address: _____

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Name: _____ Address: _____

**From:** [redacted]
**To:** Adrienne Asadoorian
**Subject:** I Object to the city"s intent about Parcel Number P24-00794
**Date:** Tuesday, December 10, 2024 9:48:31 PM

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**External Email:** Use caution with links and attachments

I couldn't say it better than the Objections listed below, written by my neighbor.
I agree with all these points.

Particularly, I find it unscrupulous to try to push these zoning issues through at holiday time. I think "Shame on you."

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Nadine Brubaker Howell
Fresno, CA

**From:** [redacted]
**To:** Adrienne Asadoorian
**Subject:** Notice of Intent to Adopt a Mitigated Negative Declaration regarding Parcel P24-00794
**Date:** Saturday, December 14, 2024 10:46:01 AM

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**External Email:** Use caution with links and attachments

[redacted]

December 14, 2024

RE: Notice of Intent to Adopt a Mitigated Negative Declaration regarding Parcel P24-00794

Dear Ms. Asadoorian:

I am writing to object to the Notice of Intent to Adopt a Mitigated Negative Declaration regarding Parcel P24-00794 and the reconsideration of Building App. No. P21-00989 that previously failed to gain approval by Project Review Committee, the Fresno Planning Commission, and the City Council for numerous problematic issues.. The 82 unit 3 and 4 story apartment complex at Herndon Avenue and N. Prospect Avenue as proposed should not be built as currently planned for a number of significant reasons that present several potential risks and liability for future residents of the facility.

These include:

1. Building evacuation in case of fire,
2. Access to the proposed project off Prospect by the fire department,
3. Safe pedestrian pathways from the proposed project to the H. Roger Tatarian elementary school,
4. Increased traffic thru the poorly configured and too small traffic circle on Prospect, north of Herndon, and
5. Inadequate parking spaces for the proposed complex.

The developer's representative at the Planning Commission meeting stated that the target clientele of the proposed project would be senior citizens. Many elderly individuals have limited mobility and some seniors are easily confused when placed in stressful situations, particularly if they have mild dementia. During a building evacuation because of fire when elevator use is prohibited, many senior citizens may be unable to quickly negotiate third and fourth floor stairways to move to safety outside the buildings. In addition , the four-story portion will not have windows on the eastern side of the building thereby limiting rescue access by firefighters using ladder trucks.

N. Prospect Avenue itself is too narrow at the level of the tiny turn-around circle to accommodate a pickup truck towing a moderate-sized trailer. I question the ability of a fire ladder truck to negotiate a turn into the proposed complex especially if and when facility residents are attempting to move their vehicles to safety. These difficulties would certainly delay both fire fighter evacuations of facility residents and delay implementation of fire fighting efforts.

Despite the developer's belief that the proposed complex would be largely inhabited by senior citizens, one must assume that given its proximity to an elementary school, any number of families with children would also be residents of the complex. Safe pedestrian pathways do not exist currently between the proposed complex and H. Roger Tatarian elementary school; rather children would need to either walk along the gravel shoulder of the narrow two lane portion of N. Valentine Avenue that parallels Herndon Avenue or traverse the open field north of that side road. Placing those young children at risk from drivers hurrying to work along the already congested road seems unwise when increased traffic along N. Prospect from the proposed complex must be assumed.

The poorly designed connection of N. Valentine Avenue to Herndon Avenue, where N. Valentine becomes a frontage road that enters Prospect Avenue from the West, has already created a significant obstacle to the smooth flow of traffic from N. Valentine onto Herndon Avenue. Complicating the flow of traffic further at N. Prospect and Herndon by adding additional traffic from an 82 unit apartment complex will lead to undue congestion and innumerable fender-bender accidents along N. Prospect.

One must expect that most of the target clientele (senior citizens) of the proposed project will be moving into the apartments to "down-size" their remaining years and will have two vehicles or the residents will be working parents with two vehicles. The proposed

apartment complex does not have adequate parking facilities to accommodate even 150 vehicles, much less 164 cars and trucks. Local street parking lacks the capacity to support more than a few extra vehicles.

May I suggest that several changes be made to either or both the proposed complex or the surrounding street traffic infrastructure. Certainly, anticipating the numerous problems noted above and providing solutions prospectively would seem wise. I remember that the traffic signal at Marks and Herndon Avenue was constructed to replace the 4-way stop signs only after a Supervisor's teenage daughter was killed in a traffic accident at that intersection. Prospectively dealing with the above mentioned problems might save lives in the future.

I humbly suggest several potential solutions:

1. Down-size the proposed project to a maximum of two-story buildings
2. Move the entrance and exit from the proposed complex to W. Fir Avenue instead of N. Prospect Avenue.
3. Widen the frontage road portion of N. Valentine Avenue that parallels Herndon Avenue and add a sidewalk along the northern portion of that road and along N. Prospect Avenue while widening N. Prospect Avenue itself along with the construction of a larger traffic turning circle to N. Prospect Avenue.
4. Maintain or increase the number of parking spaces in the proposed complex despite down-sizing the number of proposed housing units themselves.

These corrective suggestions surely might be implemented by either the city or the developer of Parcel Number P24-00794 if the City of Fresno were concerned for any future residents of any development project on the aforementioned parcel of land.

In conclusion, I strenuously object to the Notice of Intent to Adopt a Mitigated Negative Declaration as a city wide code amendment and more specifically for application of any such declaration in regard to Parcel Number P24-00794 for the reasons stated above because development of the parcel per Building App. No. P21-00989 without significant corrective measures would place future resident adults and their children at significant risk of injury.

Yours Sincerely,

Virgil M. Airola

**From:** [redacted]
**To:** Adrienne Asadoorian
**Cc:** [redacted]
**Subject:** Objection to the Notice of Intent re:Parcel#P24-00794
**Date:** Saturday, December 14, 2024 2:38:00 PM

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**External Email:** Use caution with links and attachments

Please see attached letter.  Thank you for your assistance and consideration.

OBJECTIONS

We would like to object to the Notice of Intent to Adopt a Mitigated Negative Declaration listed with Parcel Number P24-00794 even though it is a city wide text code amendment.

This would affect three parcels in our neighborhood that are currently zoned for office and potentially a number of existing offices. We already have one parcel zoned for high density multi family. This parcel at Prospect and Herndon was rezoned as part of the 2030 rezone during the Holiday Season in 2015 with no input from nearby residents.
Steve Brandau did not protect his constituents with provisions to revisit parking and density like were done in District 6.

We object to the ministerial zoning that "meets the City's development code." There is no planning involved with this code. The Planning Department does not consider any existing or future problems that might be exacerbated by the development. The planners and city council do not consider the preservation and character of the neighborhood.

The City has created the problems that make multi family development in this neighborhood impractical. We have made the City aware of these problems on NUMEROUS occasions starting with emails to Councilman Karbassi in 2019. We have attended numerous meetings. We delivered 929 signatures to the Planning Department on 9/20/21 and again in May 2024. These signatures were attached to a document that noted:

1) Inadequate parking for Orchid Park. The parking was inadequate for what they planned the park to be from day 1. It should be noted that original property owners paid park fees and had to wait 10 or more years for the park to be finally built. Councilman Karbassi has acknowledged this problem but it hasn't been fixed. Mayor Jerry Dyer has said that these "neighborhood parks have become regional parks." It should be noted that the Pickleball courts at Orchid Park are one of the most popular in the city. The parking lot often barely accommodates this.

2) No street parking for the vehicles that will be generated by new developments. The parking requirements listed by a state code used by the Planning Department are totally inadequate for multi family housing.

3) The small short street (Prospect) with the POORLY DESIGNED ROUNDABOUT and unworkable traffic flow on one of the two access roads into the neighborhood. The city has long promised to run Fir through to Valentine Avenue when they build the park. It was promised again when Leo Wilson built a large housing development adjacent to the park. Just this year it was considered but then cancelled by Councilman Karbassi at the budget hearing. Jerry Dyer now says those promises from the city are "too old."

4) Altered traffic patterns throughout the neighborhood as a result of people avoiding Prospect

and using Brawley Avenue instead. Again the city is adding higher density on each parcel leading to roads through the neighborhood that were not designed to handle that traffic. With each new development the quality of life in the existing neighborhood has deteriorated.

5) School safety. There should be a direct path from both the existing new developments and the proposed new ones for children to walk to their elementary school. The City Manager, Georgeanne White says that, "they are not required to provide one." The neighborhood is already choked with traffic at peak pick up and drop off times. It is not safe for children to navigate alone which generates even more traffic.

6) Public Safety Vehicles. Ambulance and Fire Department vehicles have trouble navigating the roundabout and when Valentine is clogged with traffic, they cannot access the neighborhood NOW.

7) Noise and Air Pollution. Herndon is exponentially busier than it was when the neighborhood was developed. There is a lot more noise that can be heard from blocks away. Sirens, gunning engines, and just the heavier traffic can be heard blocks away.

8) Ingress and egress. The City is allowing ingress and egress on the two main feeder streets on proposed plans for new developments. This will exacerbate the congestion on these streets at peak times and cause traffic to back up onto Herndon Avenue.

We are aware that the STATE OF CALIFORNIA is pushing this along with many other policies that DO NOT WORK. These proposed developments will be permanent once they are built no matter what problems they cause.

If this amendment is such a good idea, why has the City gone to such great lengths to keep this from the public. When Councilman Karbassi was asked about this notice the response was "was this something you received in the mail?" We never received any answer as to what this was going to do.

The City has refused to keep their promises. They refuse to fix the problems brought forth to them. They definitely are not transparent in their actions.

High density multi family housing has already been rejected by the Project Review Committee, the Planning Commission, and by the City Council. This amendment would basically overturn those decisions and ruin a neighborhood that already has all types of housing. This amendment would negate the will of the people who have already prevailed on this issue despite a secretive, abusive, and uneven playing ground.

As this amendment will further erode the public's right to participate in addressing development in their own communities it should be denied.

## Objection Signature Sheet

**We object to the Notice of Intent to Adopt a Mitigated Negative Declaration listed with Parcel Number P24-00794 even though it is a city wide text code amendment. We object to the text code amendment that would allow ministerial zoning for multi-family in our neighborhood.**

| Signature | Address |
| --- | --- |
| [redacted] | [redacted] |
| [redacted] | [redacted] |
| [redacted] | [redacted] |
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**From:** [redacted]
**To:** Adrienne Asadoorian
**Cc:** [redacted]
**Subject:** Objection to the Notice of Intent to Adopt a Mitigated Negative Declaration
**Date:** Tuesday, December 17, 2024 1:54:44 PM
**Attachments:** Objection Signatures.pdf

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**External Email:** Use caution with links and attachments

We would like to object to the Notice of Intent to Adopt a Mitigated Negative Declaration listed with Parcel Number P24-00794 even though it is a city wide text code amendment. This would affect three parcels in our neighborhood that are currently zoned for office and potentially a number of existing offices. We already have one parcel zoned for high density multi family. This parcel at Prospect and Herndon was rezoned as part of the 2030 rezone during the Holiday Season in 2015 with no input from nearby residents. Steve Brandau did not protect his constituents with provisions to revisit parking and density like were done in District 6. We object to the ministerial zoning that "meets the City's development code." There is no planning involved with this code. The Planning Department does not consider any existing or future problems that might be exacerbated by the development. The planners and city council do not consider the preservation and character of the neighborhood. The City has created the problems that make multi family development in this neighborhood impractical. We have made the City aware of these problems on NUMEROUS occasions starting with emails to Councilman Karbassi in 2019. We have attended numerous meetings. We delivered 929 signatures to the Planning Department on 9/20/21 and again in May 2024. These signatures were attached to a document that noted: 1) Inadequate parking for Orchid Park. The parking was inadequate for what they planned the park to be from day 1. It should be noted that original property owners paid park fees and had to wait 10 or more years for the park to be finally built. Councilman Karbassi has acknowledged this problem but it hasn't been fixed. Mayor Jerry Dyer has said that these "neighborhood parks have become regional parks." It should be noted that the Pickleball courts at Orchid Park are one of the most popular in the city. The parking lot often barely accommodates this. 2) No street parking for the vehicles that will be generated by new developments. The parking requirements listed by a state code used by the Planning Department are totally inadequate for multi family housing:
3) The small short street (Prospect) with the POORLY DESIGNED ROUNDABOUT and unworkable traffic flow on one of the two access roads into the neighborhood. The city has long promised to run Fir through to Valentine Avenue when they build the park. It was promised again when Leo Wilson built a large housing development adjacent to the park. Just this year it was considered but then cancelled by Councilman Karbassi at the budget hearing. Jerry Dyer now says those promises from the city are "too old.") Altered traffic patterns throughout the neighborhood as a result of people avoiding Prospect and using Brawley Avenue instead. Again, the city is adding higher density on each parcel leading to roads through the neighborhood that were not designed to handle that traffic. With each new development the quality of life in the existing neighborhood has deteriorated. 5) School safety. There should be a direct path from both the existing new developments and the proposed new ones for children to walk to their elementary school. The City Manager, Georgeanne White says that, "they are not required to provide one." The neighborhood is already choked with traffic at peak pick up and drop off times. It is not safe for children to navigate alone which generates even more traffic. 6) Public Safety Vehicles. Ambulance and Fire Department vehicles have trouble navigating the roundabout and when Valentine is clogged with traffic, they cannot access the neighborhood NOW. 7) Noise and Air Pollution. Herndon is exponentially busier than it was when the neighborhood was developed. There is a lot more noise that can be heard from blocks away. Sirens, gunning engines, and just the heavier traffic can be heard blocks away. 8) Ingress and egress. The City is allowing ingress and egress on the two main feeder streets on proposed plans for new developments. This will exacerbate the congestion on these streets at peak times and cause traffic to back up onto Herndon Avenue. We are aware that the STATE OF CALIFORNIA is pushing this along with many other policies that DO NOT WORK. These proposed developments will be permanent once they are built no matter what problems they cause. If this amendment is such a good idea, why has the City gone to such great lengths to keep this from the public. When Councilman Karbassi was asked about this notice the

response was "was this something you received in the mail?" We never received any answer as to what this was going to do. The City has refused to keep their promises. They refuse to fix the problems brought forth to them. They definitely are not transparent in their actions.
We are aware that the STATE OF CALIFORNIA is pushing this along with many other policies that DO NOT WORK. These proposed developments will be permanent once they are built no matter what problems they cause. If this amendment is such a good idea, why has the City gone to such great lengths to keep this from the public. When Councilman Karbassi was asked about this notice the response was "was this something you received in the mail?" We never received any answer as to what this was going to do. The City has refused to keep their promises. They refuse to fix the problems brought forth to them. They definitely are not transparent in their actions. High density multi family housing has already been rejected by the Project Review Committee, the Planning Commission, and by the City Council. This amendment would basically overturn those decisions and ruin a neighborhood that already has all types of housing. This amendment would negate the will of the people who have already prevailed on this issue despite a secretive, abusive, and uneven playing ground. As this amendment will further erode the public's right to participate in addressing development in their own communities it should be denied.
Please see the attached signature page.

Thank you,

Ulysses Caiati, President
Sierria Sky Park Property Owners Association

**From:** [redacted]
**To:** Adrienne Asadoorian
**Subject:** Parcel Number P24-00794
**Date:** Monday, December 9, 2024 3:39:15 PM
**Attachments:** San Joaquin Neighbors Comments.docx

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**External Email:** Use caution with links and attachments

**Subject:** Formal Objection to Proposed Zoning Changes (Parcel Number P24-00794)

To: **Adrienne.Asadoorian@fresno.gov**

I am writing to formally object to the Notice of Intent to Adopt a Mitigated Negative Declaration related to Parcel Number P24-00794, which is part of a citywide text code amendment. While this amendment affects multiple areas, its implications for our neighborhood are particularly concerning.

This amendment targets three parcels currently zoned for office use and potentially others, in addition to the one parcel already rezoned for high-density multifamily housing at Prospect and Herndon. That rezoning occurred during the 2015 holiday season with little to no input from affected residents. Unlike other districts, such as District 6, this area lacks adequate protections for parking and density concerns, leaving the community vulnerable to overdevelopment.

## Specific Concerns:

1. **Lack of Planning and Neighborhood Consideration**:
   - Ministerial zoning that "meets the City's development code" disregards the unique needs and existing challenges in our neighborhood.
   - There has been no effort to consider how this amendment exacerbates ongoing issues such as traffic congestion, safety, and quality of life.
2. **Broken Promises and Community Frustration**:
   - Despite numerous emails, meetings, and petitions—most notably 929 signatures submitted in September 2021 and May 2024—the City has not addressed longstanding issues, including inadequate parking at Orchid Park, poor road infrastructure, and insufficient traffic mitigation measures.
3. **Traffic and Safety Concerns**:
   - The poorly designed roundabout on Prospect Street, coupled with inadequate access roads, already causes significant congestion. Increased density will only worsen these conditions.
   - There is no safe path for children walking to the local elementary school, further endangering students during peak traffic times.
   - Emergency vehicles such as ambulances and fire trucks struggle to navigate the neighborhood's current infrastructure.
4. **Environmental and Quality-of-Life Impacts**:
   - Increased noise and air pollution due to heavy traffic on Herndon Avenue directly affect residents' well-being.
   - The City's allowance for ingress and egress onto main feeder streets will further congest these roads and create backups onto Herndon.
5. **Lack of Transparency and Public Engagement**:
   - The city has failed to provide clear and timely communication about this amendment, raising concerns about its commitment to transparency.
   - High-density housing proposals have previously been rejected by the Project Review Committee, Planning Commission, and City Council. This amendment would overturn those decisions, disregarding the will of the community.

## Conclusion:

This amendment undermines the public's right to participate in decisions about their neighborhoods and disregards the valid concerns of residents who have fought for responsible development. The proposed changes would impose permanent, detrimental impacts on our community; further eroding trust in the City's planning process.
I respectfully urge the city to reject this amendment. It is imperative that community voices are considered, and that thoughtful, transparent planning takes precedence over rushed policies.

Thank you for your attention to this matter.

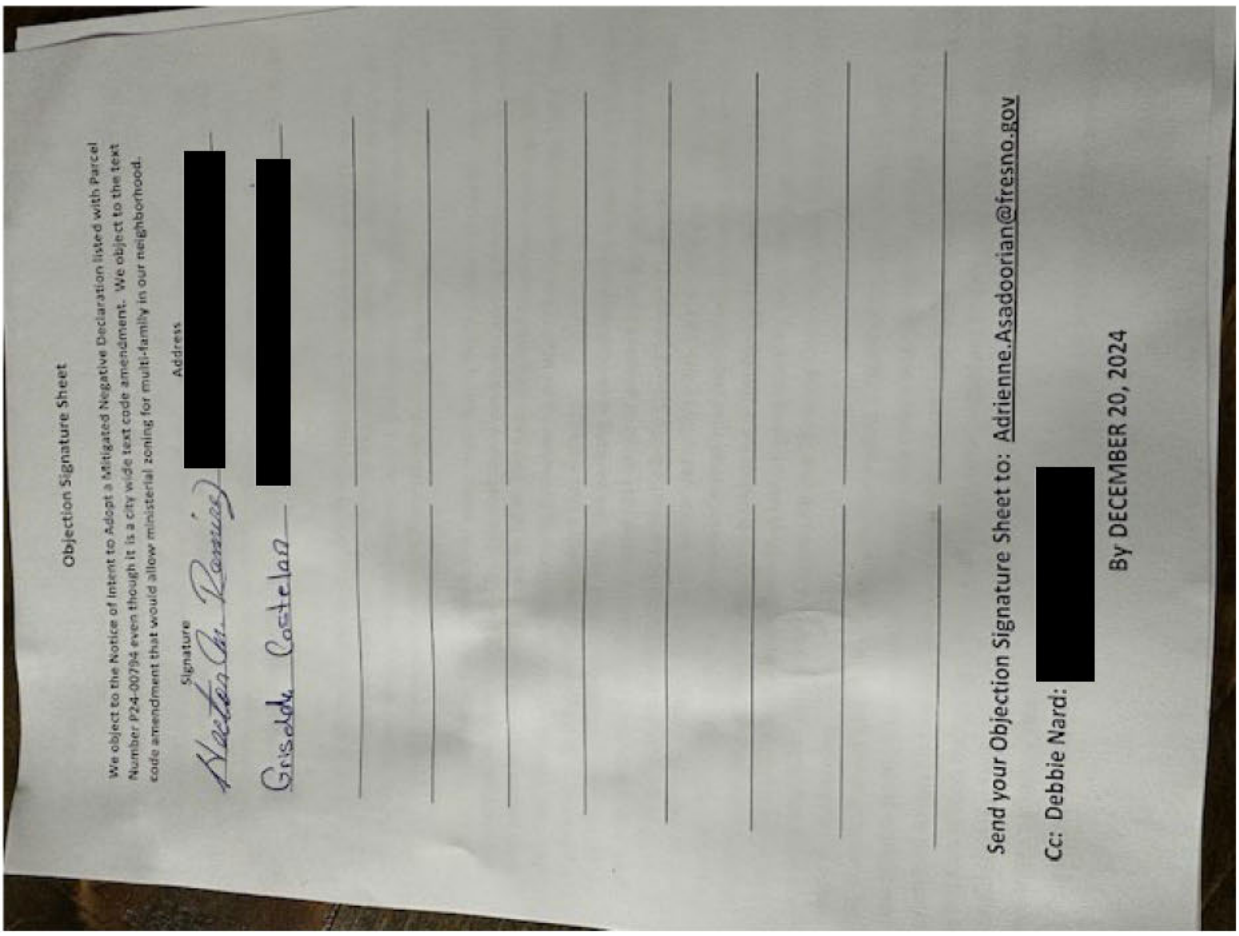
Sincerely,

Name: Peter Nunez (signed copy is attached) Address: [redacted]
[redacted]

Peter Núñez
President
General Teamsters Local 431

**From:** [redacted]
**To:** Adrienne Asadoorian
**Date:** Monday, December 16, 2024 7:25:29 PM

External Email: Use caution with links and attachments



Objection Signature Sheet

We object to the Notice of Intent to Adopt a Mitigated Negative Declaration listed with Parcel Number P24-00794 even though it is a city wide text code amendment. We object to the text code amendment that would allow ministerial zoning for multi-family in our neighborhood.

| Signature | Address |
|---|---|
| [redacted] | [redacted] |
| Griselda Castelan | [redacted] |

Send your Objection Signature Sheet to: Adrienne.Asadoorian@fresno.gov

Cc: Debbie Nard: [redacted]

By DECEMBER 20, 2024

Sent from my iPhone

**From:** [redacted]
**To:** Adrienne Asadoorian
**Cc:** [redacted]
**Subject:** Resending updated signature page
**Date:** Monday, December 16, 2024 2:59:29 PM

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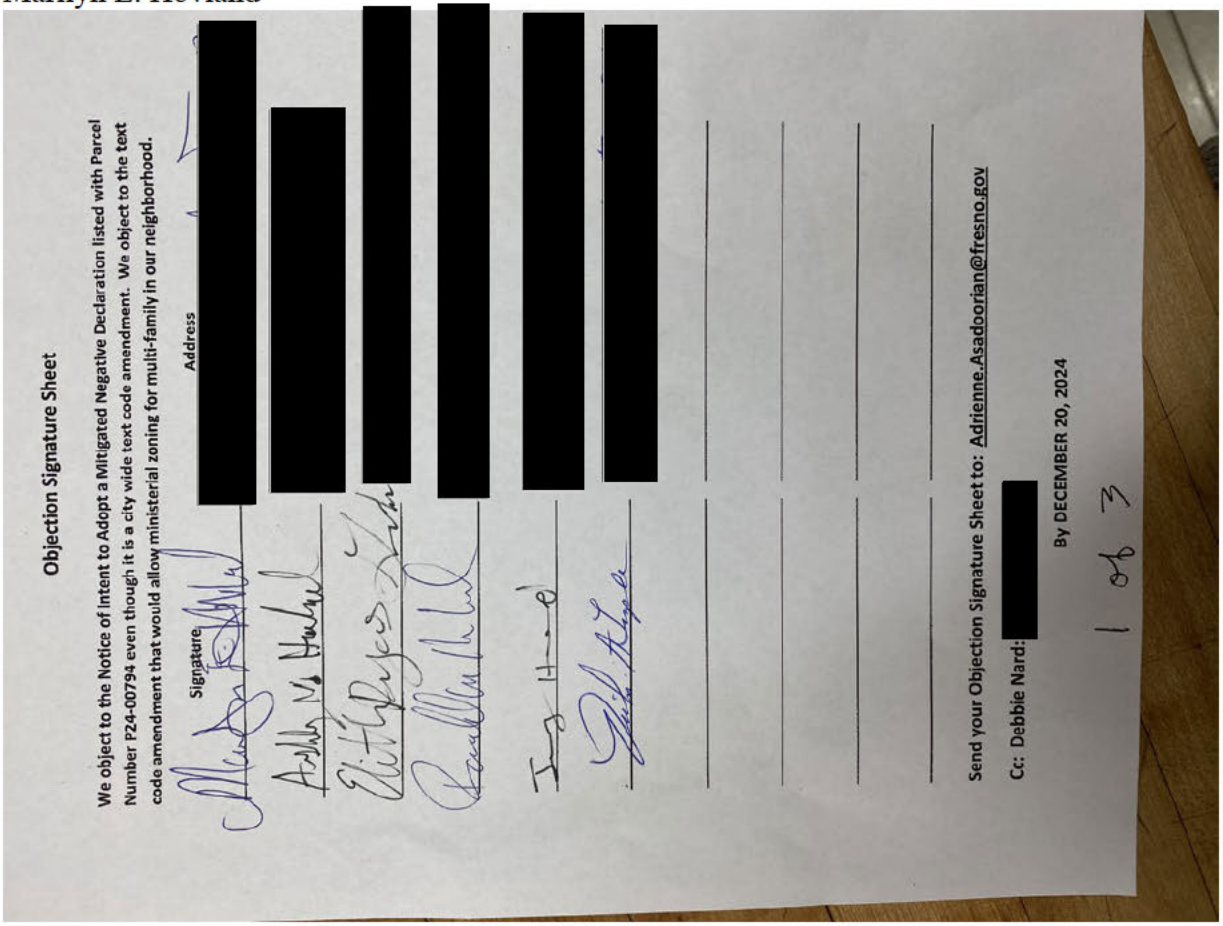
**External Email:** Use caution with links and attachments

I had another neighbor that stopped by to sign the objection signature sheet for P24-00794. Please add it to my letter sent earlier today, 12/16/24

Regards,

Marilyn E. Hovland



**Objection Signature Sheet**

We object to the Notice of Intent to Adopt a Mitigated Negative Declaration listed with Parcel Number P24-00794 even though it is a city wide text code amendment. We object to the text code amendment that would allow ministerial zoning for multi-family in our neighborhood.

Signature | Address

[redacted]

Send your Objection Signature Sheet to: Adrienne.Asadoorian@fresno.gov

Cc: Debbie Nard: [redacted]

By DECEMBER 20, 2024

1 of 3

Sent from the all new AOL app for iOS

**From:** [redacted]
**To:** [redacted]
**Subject:** COMMENT - Development Code Text Amendment No. P24-00794
**Date:** Wednesday, December 11, 2024 1:35:51 PM
**Attachments:** [redacted]

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**External Email:** Use caution with links and attachments

Dear Adrienne Asadoorian,

I'd like to submit a comment in opposition of Development Code Text Amendment No. P24-00794. I have added it as an attachment and also pasted a copy below in case the attachment does not open.

Please let me know if I need to send the comment somewhere else or if you have any questions.

Thanks,
Kimberly Sabus
[redacted]

December 11, 2024

Dear Planning Commission,

I am writing today in opposition of amendment P24-00794. I commend Fresno's work to increase housing overall and increase city infill, however I do not agree that changing O zoning regulations to include RM-3 units to be best for the city. On Page 1, I will outline my concerns in general and on Page 2, I will demonstrate how a blanket conversion could play out in my neighborhood.

I would love to see Fresno transformed from a sprawling, car-reliant society to a walkable city so much so I even dream about our canal banks being transformed into beautiful walking trails. I do not believe that changing zoning of O to allow RM-3 achieves this goal.

One question I have is, why was the decision made to change O to RM-3 instead of RM-1 or RM-2 or allowing the owner to decide RM-1, 2 or 3 based on lot size and location? Why wasn't CMX or RMX chosen instead? RM-3 adds only more housing to neighborhoods. It does not make a neighborhood more walkable. Using CMX or RMX would encourage decreased reliance on cars as people living above, and in close neighborhoods, could easily walk to offices and businesses below. By allowing bars and restaurants under housing, Fresno could also decrease incidence of DUI.

When I think about office-to-dwelling conversions or allowing new stand-alone multi-unit residential development in O zoned parcels, I immediately have many concerns.

One concerns is the safety of families living in these units. Some O lots/buildings are among other currently undeveloped O lots. While the new residential units may have some parking and sidewalks, will the adjoining lots continue the sidewalks? If only a small lot is converted, will any changes be made to roads and crosswalks?

I worry about parks—or lack thereof. These O zoned areas also tend to have fewer parks. If lots are converted to RM-3, there will be a lot of people, including families with children, added to the neighborhood. Will the developer be required to set apart space for a park? Will children be forced to play in parking areas, streets or vacant lots near the converted O lot/business?

I worry about schools. Are the districts prepared for the influx of students and traffic that this blanket conversion could allow? Are the roads in O zones ready for school foot traffic, again, do they have sidewalks, crosswalks, etc?

I worry about traffic and congestion. One office lot may have a little to a lot of traffic, but adding 30-45 units per acre surely will increase traffic. In every conversion or new project required consider this or will it be left for the city to figure out after the fact? It seems the proposal only requires traffic considerations for larger projects, but multiple small project could be done at once and have the same effect on traffic and congestion as one large project.

I also wonder how this plays out for office complexes that are composed of multiple parcels sometimes owned by different entities. Can one office building in an existing complex decide to convert to multiunit residential? Complex bylaws likely wouldn't have provisions for this as it was not previously allowed.

A Neighborhood Consideration:

To understand the effect the proposal may have on neighborhoods, I started first in near my own neighborhood. Here I have selected several parcels to illustrate:

550280345 is a 7.41 acre parcel zoned O at 7080 N. Valentine. This is between Herndon Ave on the south and Tatarian Elementary on the north. 501142015, 501142075 and 501152035 are vacant O-zoned vacant lots along Beechwood Ave between Brawley and Valentine. They are each between 1-1.5 acres. There are 4 additional O zoned lots with current office buildings along Beechwood as well. (See attachment 1)

- The 7.41 acre lot alone could add 222-333 housing units. (Blue)
- Together the vacant O lots along Beechwood could add 139 - 208 housing units. (Blue)
- The 4 current office lots could be converted doubling this to 278- 416 units. (Purple)
- All of these lots could turn into a total of 500-749 units.
- This is in addition to the 3.65 acres at Fir/Prospect which is already slated to become 82 apartment units pending the outcome of the lawsuit with Buckkamp.

The points of entry to these lots are either from Brawley avenue on the west and from Valentine on the east. (See attachment 2). Beechwood avenue itself is lined with two islands down the center and is already very narrow with street parking. Valentine/Prospect traffic is directed north to a very small roundabout which directs traffic back south to a narrow two-lane frontage road along Herndon before turning north where traffic is congested by Tatarian Elementary and can also turn left onto Beechwood.

Unlikely most other areas of Fresno, neighborhoods north of Herndon and west of Palm have unreliable east-west connecting roads and instead rely on connectors to funnel traffic down to Herndon.

Brawley is already the main entry point to homes to 275 homes to the north, plus 74 homes, 68 apartments and the office of United Health Care to the west on Beechwood. It is the ONLY entry point to the homes, apartments and business along Beechwood as well as the eastern half of Sierra Skypark.

Valentine/Prospect would be the main point of entry to another 150-200 homes north of Tatarian Elementary (this is only half of the homes north of Tatarian and Orchid Park, the other half of traffic could more easily enter from Marks). Buckkamp's project on Fir/Prospect will also increase traffic exiting Valentine to Herndon.

Allowing the conversion of O lots between Brawley and Valentine could *more than double the number of families living in this area.*

Here are my concerns with the conversion of just these lots alone:

- Increased traffic.
  a. Without the addition of RM-3 multifamily units, traffic is already congested and limited on Beechwood and Valentine due to existing housing and Tatarian elementary school. There are no "main arteries" or collectors through this neighborhood.
  b. The frontage road of Valentine funnels into south Prospect at the light at Herndon. Traffic waiting at the light to go south on Valentine/Prospect backs up onto the frontage road. The frontage road's location already cannot handle current residential and school traffic.
    i. A new road would need to be constructed south of the school and existing home to make Beechwood run through connecting to Fir. (Attachment 1 - red line). There is no way the existing roads could accommodate this amount of traffic. Does the current proposal contain guardrails that would require roads to be improved (in this case to move roads completely)?
    ii. WHO WOULD ENSURE the roads can accommodate increased traffic? WHO WOULD PAY for construction or improvement of new or current roads?
  c. Increased vehicle and foot traffic to school.
    i. Traffic around Tatarian Elementary is already more congested than most schools due to its position off a main artery road, meaning traffic cannot easily enter and exit during drop-off and pick-ups.
- Decreased or compromised emergency response time and evacuation
  a. With the increase in traffic, emergency response time for fire, police, ambulance could be delayed.
  b. In the case of a natural disaster requiring evacuation—ie a large fire along the river, which could easily spread into the neighborhood—would people be able to evacuate?
    i. As stated above, there are no main arteries or collectors through this neighborhood, some streets have only one outlet. Allowing conversion of O lots could more than double the amount of families and cars making a disaster unsafe for current residents.
- Increased school enrollment.
  a. What number of families would be added to this neighborhood? Could Tatarian Elementary accommodate this increased number of students? Could Tatarian Elementary and the neighborhood to the north accommodate the increased amount of traffic? As stated above, converting just these 8 O lots could more than double the current population.

As you can see from the above considerations, there are already multiple issues that arise with changing the zoning ordinance to allow RM-3 multi-family housing on all existing "O" zoned lots. I've only had time to look at one neighborhood, but I can imagine that neighborhoods all around Fresno would have some of the same issues as well as other issues of their own. I worry that making a blanket statement to change the zoning could cause unexpected problems and undue stress on existing neighborhoods.

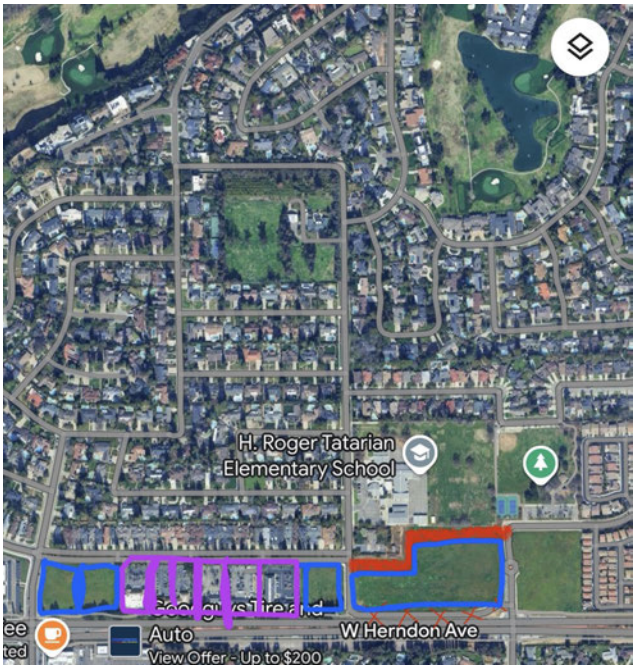
To conclude, I strongly oppose allowing office-to-dwelling conversions or new standalone multi-unit residential developmeant in the O zoned district. I believe changes to the O zoning would be best made on a case-by-case basis or one neighborhood at a time.

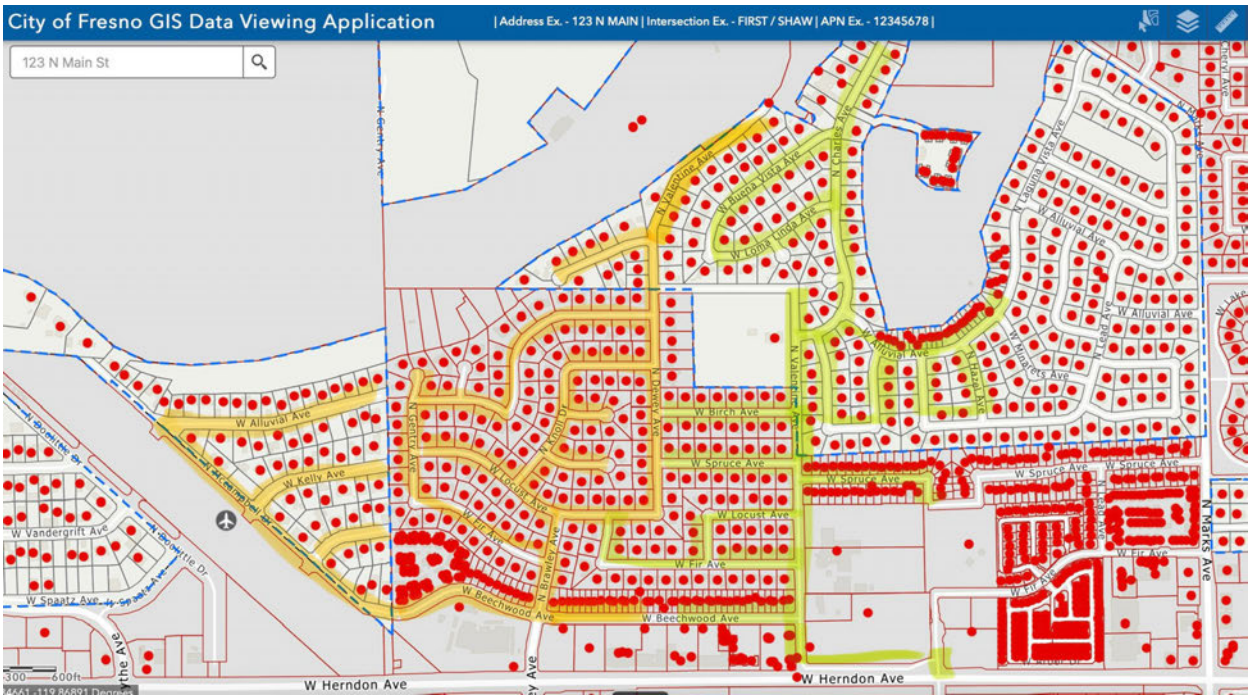
Thank you for your time and service,

Kimberly Sabus
[redacted]

Attachment 1:
Map view of area north of Herndon between Brawley and Valentine/Prospect.
Blue: Vacant Lots currently zoned as O
Purple: Lots currently zoned O with office buildings
Red Line: My proposed route for new road to accommodate existing and future traffic

Attachment 2:
Map area north of Herndon between Blythe and Marks.
Yellow: Roads that outlet mainly to Brawley
Green: Roads that outlet mainly to Valentine/Prospect
Note that there are no main arteries or connectors in this area.




City of Fresno GIS Data Viewing Application
| Address Ex. - 123 N MAIN | Intersection Ex. - FIRST / SHAW | APN Ex. - 12345678 |
123 N Main St
W Alluvial Ave
W Kelly Ave
W Vandergrift Ave
W Spaatz Ave
W Herndon Ave
W Birch Ave
W Spruce Ave
W Locust Ave
W Fir Ave
W Beechwood Ave
N Valentine Ave
N Charles Ave
N Marks Ave
N Brawley Ave
N Dewey Ave
N Sentry Ave
N Doolittle Dr
N Hazel Ave
N Lead Ave
W Minarets Ave
W Loma Linda Ave
W Buena Vista Ave
N Laguna Vista Ave
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600ft

## Objection Signature Sheet

**We object to the Notice of Intent to Adopt a Mitigated Negative Declaration listed with Parcel Number P24-00794 even though it is a city wide text code amendment. We object to the text code amendment that would allow ministerial zoning for multi-family in our neighborhood.**

| Signature | Address |
|---|---|
| [redacted] | [redacted] |

**Send your Objection Signature Sheet to:** Adrienne.Asadoorian@fresno.gov

**Cc: Debbie Nard:** [redacted]

**By DECEMBER 20, 2024**

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| Signature | Address |
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| | [redacted] |
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| Signature | Address |
|---|---|
| Joyce A. Hurley | [redacted] |
| Brian Hay | |
| Valerie Goyh | |
| Michelle Lopez | |
| Linda Jones | |
| Roberto DeSa | |
| Patricia Hayden | |
| Mitch Hutchens | |
| Sharon Shockley | |
| [illegible] | |

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| Signature | Address |
|---|---|
| Carol F. Mandy | [redacted] |
| Cynthia Grea | |
| Joe O'Cole | |
| Barbara Cox | |
| Mary Kaufm | |
| [illegible] | |
| [illegible] | |
| [illegible] | |
| [illegible] | |
| Melissa Dempsey | |

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| Signature | Address |
| --- | --- |
| Jack Miller | [redacted] |
| Linda J Boaen | |
| Jillian gorman | |
| Debbie Whaley | |
| Kirk Whitney | |
| Gail Dorra | |
| [illegible] | |
| [illegible] | |
| for Jim | |
| [illegible] | |

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| Signature | Address |
|---|---|
| Joseph A. Lamanna | [redacted] |
| [illegible] | |
| [illegible] | |
| [illegible] | |
| [illegible] | |
| Jayne E McClung | |
| Ashley Dupreesbie | |
| Mary L Fifer | |
| Yvonne Stout-Bar | |
| Wayne McKeman | |

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| Signature | Address |
|---|---|
| [illegible] | [redacted] |
| Jennifer Owens | |
| Megan Cardwell | |
| Anthony Pembo | |
| Chris [illegible] | |
| Mark Vaughan | |
| [illegible] | |
| [illegible] | |
| [illegible] | |
| [illegible] | |

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| Signature | Address |
|---|---|
| Michael O'Brien | [redacted] |
| Nancy Decker | |
| Bill Decker | |
| Jennifer Wynveen | |
| Kathy Mock | |
| Mark Mock | |
| Debbie Dow | |
| Kristin Dow | |
| Kalyn Dow | |
| [illegible] | |

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| --- | --- |
| | [redacted] |

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| Signature | Address |
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| [redacted] | [redacted] |
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| Signature | Address |
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| [redacted] | [redacted] |
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**Cc: Debbie Nard:** [redacted]

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| Signature | Address |
|---|---|
| | [redacted] |
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| Christine Monahan | |
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| | |
| Kurt Billingsley | |
| | |
| Kathleen Browning | |

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| Signature | Address |
| --- | --- |
| Elia Dusi | [redacted] |
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| Signature | Address |
|---|---|
| Catherine H. Christensen | [redacted] |
| Ryan H Christensen | |
| Joshua D Christensen | |
| Annette Christensen | |
| Patricia Meyers | |
| Sandra Hempel | |
| Varoujan Altebarmakis | |
| [illegible] | |
| Harvey H Christensen | |

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**Cc: Debbie Nard:** [redacted]

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| Signature | Address |
| --- | --- |
| Tammy L Beard | [redacted] |
| [redacted] | |
| Myra Avalos | |
| Beth Pound | |
| Tripp M. Pound | |
| [redacted] | |
| [redacted] | |
| Kenneth Chamberlain | |
| Milena Bustos | |

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**Cc: Debbie Nard:** [redacted]

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| Signature | Address |
| --- | --- |
| [redacted] | [redacted] |

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| Signature | Address |
|---|---|
| Anne Herogian | [redacted] |
| Deb Nance | |
| [illegible] | |
| Larry DeSantis | |
| Denise De Santis | |
| Linda C. Eyster | |
| DA Yavanes | |
| Gloria Kendirgian | |
| Marian Habib | |
| Karen Melikian | |

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| Signature | [redacted] |
|---|---|
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| Coleen Anders | |
| Mark Anderson | |
| Brandon Weaver | |
| Bruce Moradian | |
| Paula Moradian | |
| Tom Schab | |
| Barry Schab | |
| Kelly Schab | |

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| Signature | [redacted] |
|---|---|
| Karen L Stone | |
| Tony L Stone | |
| Lynn Griffin | |
| Ronnie Griffin | |
| B Nowell | |
| Marie Robinson | |
| Bob Lindemann | |
| Sam Lindemann | |
| Ditsa Acedo | |
| Jan Jakovich | |

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**Cc: Debbie Nard:** [redacted]

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| Signature | Address |
|---|---|
| [redacted] | [redacted] |
| Howard M. Ford | |
| Diane Eggebraaten | |
| Ray Eggebraaten | |
| Linda Solomon | |
| Patricia Baker | |
| Bill Hinton | |
| A Hinton | |
| Jodie Beal | |

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| Signature | Address |
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| Signature | | [redacted] |
|---|---|---|
| GARY H. RUSHING | Gary H. Rushing | |
| Sara E. Rushing | Sara E. Rushing | |
| | | |
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| Signature | Address |
| --- | --- |
| [redacted] | [redacted] |
| Carl Holmes | |
| Ian Holmer | |
| Kelly Rockwell | |
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Cc: Debbie Nard: [redacted]

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| Signature | Address |
|---|---|
| DEELLA A. RAY | [redacted] |
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| Signature | Address |
|---|---|
| Carla Ratliff | [redacted] |
| Robyn Wagner | |
| Thingdy Madsen | |
| Erik [illegible] | |
| [illegible] | |
| Marty A Dekinero Bad | |
| Carrie McCreo | |
| [illegible] Kay | |
| Gina Kazanjian | |
| | |

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| Signature | [redacted] |
|---|---|
| [illegible] | |
| Eric T Drake | |
| Gwenith Coson | |
| [illegible] | |
| [illegible] | |
| Judith Reeves | |
| STEVEN D. FLORES | |
| ANNETTE FLORES | |
| Connie McBride | |
| Carrie Morgan | |

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| Signature | Address |
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| Signature | Address |
|---|---|
| Lisa Peacock | [redacted] |
| Jonah Peacock | |
| Haley Peacock | |
| Jordan Staub | |
| Cedric Peacock | |
| M Echeverria | |
| Andrew Peters | |
| | |
| | |
| | |

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**Cc: Debbie Nard:** [redacted]

**By DECEMBER 20, 2024**

FENNEMORE.
DOWLING AARON

**Christopher A. Brown**
**Director**
cbrown@fennemorelaw.com

8080 N Palm Avenue, Third Floor
Fresno, California 93711
PH (559) 446-3222 | FX (559) 432-4590
fennemorelaw.com

January 14, 2024

**VIA EMAIL AND CERTIFIED MAIL/ adrienne.asadoorian@fresno.gov**

Adrienne Asadoorian-Gilbert
City of Fresno
2600 Fresno Street
Fresno, CA 93721

**Re**: **Public Comment on Project Application P24-00794 Development Code Text Amendment and the corresponding Mitigated Negative Declaration.**

Dear Ms. Asadoorian-Gilbert:

On behalf of the Northwest Neighbors for Safe Development, we submit this comment letter in opposition to the City Development Code Text Amendment Project Application P24-00794 and the corresponding Mitigated Negative Declaration, ("**Project**").

The Northwest Neighbors for Safe Development oppose this Development Code Text Amendment because it would make certain projects in the City of Fresno ministerial and thereby exempt from CEQA despite the fact that projects of certain sizes as contemplated in the MND having significant unmitigated impacts on the environment and public health.

On November 20, 2024, the City of Fresno ("**City**") circulated the Project's Mitigation Negative Declaration ("**MND**") for public comment through submission to the State Clearing House.[1] The reasons for the opposition are set forth herein.

The Northwest Neighbors for Safe Development earlier in 2024 opposed Fresno City Council July 25, 2024 Agenda Item ID 24-899: Appeal of Project at 7056 North Prospect Avenue, Development Permit Application No. P21-00989, and CEQA determination under Class 32 Categorical Exemption ("**7065 North Prospect Project**"). While the City Council denied that

[1] Initial Study/Mitigated Negative Declaration (IS/MND) on behalf of the City of Fresno (City) to address the environmental effects of the Development Code Text Amendment Application No. P24-00794 (Project, proposed Project, or Text Amendment) available at Text-Amendment-P24-00794-Public-Review-Draft-ISMND-10w300.pdf

Project, this 7056 North Prospect Avenue Project, was to be located on the northeast corner of West Herndon and North Prospect Avenues in Fresno. Under the proposed Development Code Text Amendment (which includes the northeast corner of West Herndon and North Prospect Avenues) projects of similar size to the 7056 North Prospect Project would not be required to undergo any CEQA analysis, despite the fact that Northwest Neighbors for Safe Development submitted substantial evidence to the City that projects of that size at that location would cause significant impacts on the environment and public health.

The City now attempts to avoid CEQA for projects of this size throughout the City by making them ministerial.

Our opposition previously was supported by technical comments provided by air quality and hazards expert James Clark, Ph.D,[2] and noise expert Derek Watry[3] submitted in conjunction with the 7056 North Prospect Project. They are attached here to provide substantial evidence that the Development Code Text Amendment is making projects of a similar size, which cause significant impacts, ministerial and thereby avoiding CEQA. Additionally, the MND lacks proper mitigation to avoid these impacts.

Approval of this Development Code Text would allow the 7056 North Prospect Project to be submitted again without any changes, and the City would be required to approve the project ministerially despite substantial evidence that these types of projects have unmitigated environmental impacts.

Specifically, the Development Code Text does not address potential project construction emissions, which may result in emissions of toxic air contaminants ("**TACs**") that would increase health risks to significant levels. Additionally, construction includes noise-generating activities that may result in significant noise impacts on nearby receptors. These impacts are especially severe due to the proximity of residential receptors to certain sites which now would permit ministerial residential development.

As a result, an EIR is the correct form of environmental review for the Project, because the MND failed to: (1) properly analyze certain impacts like TACs and construction noise, in addition to (2) not properly mitigating impacts that are likely to occur given the size of projects which will be ministerial under the Development Code Text Amendment.

Northwest Neighbors for Safe Development respectfully requests that the Planning Commission require the Project to undergo an EIR or recirculate the MND after adding inappropriate levels of mitigation to reduce impact levels to insignificant.

[2] Dr. Clark's technical comments and curriculum vitae are attached hereto as **Exhibit A** ("Clark Comments").
[3] Mr. Watry's technical comments and curriculum vitae are attached hereto as **Exhibit B** ("Watry Comments").

## I. STANDING AND STATEMENT OF INTEREST

Northwest Neighbors for Safe Development is an unincorporated association of individuals that may be adversely affected by the potential public health and safety hazards, and the environmental and public service impacts of the Project. The coalition includes City of Fresno residents Matt Nutting, Brandon Smittcamp, Kirk Cernigli, J.T. Contrestano, Pat Cornaggia, Rodney J. De Luca, Gary H. Rushing, Peter Nunez, David Scott, Mike Shirinian, Vicki Allen-Westburg, Debbie Nard, Dennis Nard, Rick Martin, along with their families, and other individuals who live and work in the City of Fresno.

Individual members of Northwest Neighbors for Safe Development live, work, recreate, and raise their families in the City of Fresno and surrounding communities. Accordingly, they would be directly affected by the Project's environmental, health, and safety impacts.

Northwest Neighbors for Safe Development and its members could be aggrieved by the Project allowing ministerial residential development, without proper mitigation of environmental impacts those projects could create.

## II. AN EIR IS REQUIRED

CEQA requires that lead agencies analyze any project with potentially significant environmental impacts in an EIR.[4] "Its purpose is to inform the public and its responsible officials of the environmental consequences of their decisions before they are made. Thus, the EIR protects not only the environment, but also informed self-government."[5] The EIR has been described as "an environmental 'alarm bell' whose purpose it is to alert the public and its responsible officials to environmental changes before they have reached ecological points of no return."[6]

CEQA's purpose and goals must be met through the preparation of an EIR, except in certain limited circumstances.[7] CEQA contains a strong presumption in favor of requiring a lead agency to prepare an EIR. This presumption is reflected in the "fair argument" standard. Under that standard, a lead agency "shall" prepare an EIR whenever substantial evidence in the whole record before the agency supports a fair argument that a project may have a significant effect on the environment.[8]

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[4] See Pub. Resources Code, § 21000; CEQA Guidelines, § 15002.
[5] *Citizens of Goleta Valley v. Bd. of Supervisors* (1990) 52 Cal.3d 553, 564 (*Goletta Valley*), internal citations omitted.
[6] *County of Inyo v. Yorty* (1973) 32 Cal.App.3d 795, 810.
[7] See Pub. Resources Code, § 21100.
[8] Pub. Resources Code, §§ 21080, subd. (d), 21082.2, subd. (d); CEQA Guidelines, §§ 15002, subd. (k)(3), 15064, subds. (f)(1), (h)(1); *Laurel Heights Improvement Assn. v. Regents of the Univ. of Cal.* (1993) 6 Cal.4th 1112, 1123 (*Laurel Heights II*); *No Oil, Inc. v. City of Los Angeles* (1974) 13 Cal.3d

In contrast, a mitigated negative declaration may be prepared only when, after preparing an initial study, a lead agency determines that a project may have a significant effect on the environment, but:

> (1) revisions in the project plans or proposals made by, or agreed to by, the applicant before the proposed negative declaration and initial study are released for public review *would avoid the effects or mitigate the effects to a point where clearly no significant effect on the environment would occur, and (2) there is no substantial evidence* in light of the whole record before the public agency that the project, as revised, *may* have a significant effect on the environment.[9]

Courts have held that if "no EIR has been prepared for a nonexempt project, but substantial evidence in the record supports a fair argument that the project may result in significant adverse impacts, the proper remedy is to order preparation of an EIR."[10] The fair argument standard creates a "low threshold" favoring environmental review through an EIR rather than through the issuance of a negative declaration.[11] An agency's decision not to require an EIR can be upheld only when there is no credible evidence to the contrary.[12]

"Substantial evidence" required to support a fair argument is defined as "enough relevant information and reasonable inferences from this information that a fair argument can be made to support a conclusion, even though other conclusions might also be reached."[13] According to the CEQA Guidelines, when determining whether an EIR is required, the lead agency is required to apply the principles set forth in Section 15064, subdivision (f):

> [I]n marginal cases where it is not clear whether there is substantial evidence that a project may have a significant effect on the environment, the lead agency shall be guided by the following principle: If there is disagreement among expert opinion supported by facts over the significance of an effect on the environment, the

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68, 75, 82; *Stanislaus Audubon Society, Inc. v. County of Stanislaus* (1995) 33 Cal.App.4th 144, 150-151*; Quail Botanical Gardens Found., Inc. v. City of Encinitas* (1994) 29 Cal.App.4th 1597, 1601-1602 (*Quail Botanical*).

[9] Pub. Resources Code, § 21064.5 (emphasis added).

[10] See, e.g., *Communities for a Better Environment v. South Coast Air Quality Management Dist.* (2010) 48 Cal.4th 310, 319-320.

[11] *Citizens Action to Serve All Students v. Thornley* (1990) 222 Cal.App.3d 748, 754.

[12] *Sierra Club v. County of Sonoma* (1992) 6 Cal.App.4th, 1307, 1318; see also *Friends of B Street v. City of Hayward* (1980) 106 Cal.App.3d 988, 1002 (*Friends of B Street*) ("If there was substantial evidence that the proposed project might have a significant environmental impact, evidence to the contrary is not sufficient to support a decision to dispense with preparation of an EIR and adopt a negative declaration, because it could be 'fairly argued' that the project might have a significant environmental impact").

13 CEQA Guidelines, § 15384, subd. (a).

> Lead Agency shall treat the effect as significant and shall prepare an EIR.

Furthermore, CEQA documents, including EIRs and MNDs, must mitigate significant impacts through measures that are "fully enforceable through permit conditions, agreements, or other legally binding instruments."[14] Deferring formulation of mitigation measures to post-approval studies is generally impermissible.[15] Mitigation measures adopted after project approval deny the public the opportunity to comment on the project as modified to mitigate impacts.[16] If identification of specific mitigation measures is impractical until a later stage in the project, specific performance criteria must be articulated and further approvals must be made contingent upon meeting these performance criteria.[17] Courts have held that simply requiring a project applicant to obtain a future report and then comply with the report's recommendations is insufficient to meet the standard for properly deferred mitigation.[18]

With respect to this Project, the MND fails to satisfy the basic purposes of CEQA. The MND fails to adequately disclose, investigate, and analyze the Project's potentially significant impacts, and fails to provide substantial evidence to conclude that impacts will be mitigated to a less than significant level. Because the MND lacks basic information regarding the Project's potentially significant impacts, the MND's conclusion that the Project will have a less than significant impact on the environment is unsupported.[19] The City failed to gather the relevant data to support its finding of no significant impacts. Moreover, substantial evidence shows that the Project may result in potentially significant impacts. Therefore, a fair argument can be made that the Project may cause significant impacts requiring the preparation of an EIR.

## III. THE DEVELOPMENT CODE TEXT AMENDMENT WOULD ALLOW PROJECTS OF A SIZE THAT MAY CREATE SIGNIFICANT IMPACTS BY COMPARING THOSE MINISTERIAL PROJECTS AGAINST IDENTIFIED IMPACTS OF THE DENIED 7056 NORTH PROSPECT PROJECT

One primary purpose of the Development Code Text Amendment is to allow ministerial approval regarding certain types of residential developments. For projects of certain sizes, certain expected impacts, etc., such projects can be permitted ministerially. This letter provides substantial evidence that supports a fair argument of significant impacts by comparing characteristics of the

[14] CEQA Guidelines, § 15126.4, subd. (a)(2).
[15] *Sundstrom v. County of Mendocino* (1988) 202 Cal.App.3d 296, 308-309; Pub. Resources Code, § 21061.
[16] *Gentry v. City of Murrieta* (1995) 36 Cal.App.4th 1359, 1393; *Quail Botanical*, supra, 29 Cal.App.4th at p. 1604, fn. 5
[17] *Id.*
[18] *Id.*
[19] Pub. Resources Code, § 21064.5.

denied 7056 North Prospect Project to projects that would now be allowed ministerially under the Development Code Text Amendments.

The 7056 North Prospect Project contained the following characteristics. It was located on approximately 3.7 acres located at 7056 North Prospect Avenue. The applicant proposed to construct an 82-unit multi-family residential development located at the northeast corner of West Herndon and North Prospect Avenues. The project proposed on-site and off-site improvements including, but not limited to, three (3) three-story multifamily residential buildings and one (1) four-story multifamily residential building consisting of 74 two-bedroom/two bathroom dwelling units and eight (8) two-bedroom/one-bathroom dwelling units, one (1) approximately 1,907 square-foot one-story community center building, one (1) swimming pool area, one (1) dog park area, 154 parking spaces (27 single-car garages, 72 covered carport parking spaces, and 55 uncovered parking spaces), and 6 long-term bicycle parking spaces. A Class 1 Trail for bicycle and pedestrian pathway exists along the Herndon Avenue property frontage and would serve the prospective residents. Direct access to the development would only be provided from North Prospect Avenue via a private gated entrance. One (1) emergency vehicle access approach was proposed along West Fir Avenue. Three (3) private pedestrian gates were to be provided along West Fir Avenue and two (2) private pedestrian gates were to be provided along North Prospect Avenue. The property is zoned RM-2/EA/UGM/cz (Residential Multi-Family, Urban Neighborhood/Expressway Overlay/Urban Growth Management/conditions of zoning).

Because site-specific analysis has been performed on the 7056 North Prospect Project, it provides a useful benchmark for potential impact projects that could be submitted under the proposed Development Code Text Amendment.

## IV. THERE IS A FAIR ARGUMENT THAT THE PROJECT MAY RESULT IN SIGNIFICANT IMPACTS THAT REQUIRE THE CITY TO PREPARE AN EIR

Under CEQA, a lead agency must prepare an EIR whenever substantial evidence in the whole record before the agency supports a fair argument that a project may have a significant effect on the environment.[20] The fair argument standard creates a "low threshold" favoring environmental review through an EIR, rather than through issuance of a negative declaration.[21] An agency's decision not to require an EIR can be upheld only when there is no credible evidence to the contrary.[22] Substantial evidence can be provided by technical experts or members

[20] Pub. Resources Code, § 21082.2; CEQA Guidelines, § 15064, subds. (f), (h); *Laurel Heights II*, supra, 6 Cal. 4th at p. 1123; *No Oil, Inc. v. City of Los Angeles* (1974) 13 Cal. 3d 68, 75, 82; *Stanislaus Audubon Society, Inc. v. County of Stanislaus* (1995) 33 Cal.App.4th 144, 150-151; *Quail Botanical*, supra, 29 Cal.App.4th at pp. 1601-1602.

[21] *Citizens Action to Serve All Students v. Thornley* (1990) 222 Cal.App.3d 748, 754.

[22] *Sierra Club v. County of Sonoma* (1992) 6 Cal.App.4th, 1307, 1318; see also *Friends of B Street*, supra, 106 Cal.App.3d at p. 1002 ("If there was substantial evidence that the proposed project might have a significant environmental impact, evidence to the contrary is not sufficient to support a decision to dispense with preparation of an [environmental impact report] and adopt a negative declaration,

of the public.[23] "If a lead agency is presented with a fair argument that a project may have a significant effect on the environment, the lead agency shall prepare an EIR even though it may also be presented with other substantial evidence that the project will not have a significant effect."[24]

As discussed below, there is a fair argument supported by substantial evidence that the Project may result in significant impacts relating to air quality, noise, and transportation. The City is required to prepare an EIR to evaluate the Project's impacts and propose mitigation measures to reduce those impacts to a less-than-significant level.

## A. There is Substantial Evidence Supporting a Fair Argument that the MND Underestimates and Fails to Properly Mitigate Air Quality Impacts

There is substantial evidence supporting a fair argument that the City failed to analyze the health risk impacts of potential project construction and operation on nearby sensitive receptors, which could occur under future projects that would now be ministerial.

### 1. The MND Threshold for Unit and Floor Counts To Screen Out of Air Quality Analysis Is Far Above the Level Where Smaller Projects have Found Air Quality Impacts

First, the MND notes projects up to the following size will be ministerial, and once they exceed the following sizes the project will be discretionary and be required to perform some environmental review:

> If the Project would exceed 224 units for low-rise (1-2 levels), 225 units for mid-rise (3-10 levels), or 340 units for high-rise (10+ levels) apartments, and generate more than 800 average daily one-way trips [ministerial approval is not permitted]. If the project exceeds this threshold but a technical assessment for operational and construction emissions determines the project will be below applicable air district thresholds, then the project can be processed as a zone clearance.[25]

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because it could be 'fairly argued' that the project might have a significant environmental impact").

[23] See, e.g., *Citizens for Responsible and Open Government v. City of Grand Terrace* (2008) 160 Cal.App.4th 1323, 1340 (substantial evidence regarding noise impacts included public comments at hearings that selected air conditioners are very noisy); see also *Architectural Heritage Assn. v. County of Monterey*, 122 Cal.App.4th 1095, 1117-1118 (substantial evidence regarding impacts to historic resource included fact-based testimony of qualified speakers at the public hearing); *Gabric v. City of Rancho Palos Verdes* (1977) 73 Cal.App.3d 183, 199.

[24] CEQA Guidelines, § 15062, subd. (f).

[25] MND pg. 54.

For context, the 7056 North Prospect Project was 88 units at 4 levels. Any project under the above standard could have significantly more units and significantly more floors than the 7056 North Prospect Project without any level of environmental review.

While it is true that more units and floors do not inherently mean environmental impacts at levels that are significant, Dr. Clark presented substantial evidence there will be significant effects on public health in the 7056 North Prospect Project.

The 7056 North Prospect Project would have increased health risks in the surrounding community by contributing TACs such as Diesel Particulate Matter ("**DPM**") during construction.[26] During the 7056 North Prospect Project's construction, heavy equipment and diesel trucks would emit DPM. DPM has been linked to a range of serious health problems including an increase in respiratory disease, lung damage, cancer, and premature death.[27] The 7056 North Prospect Project's emissions of DPM would impact numerous sensitive receptors, including residents in residential buildings located within 25 feet of the 7056 North Prospect Project site.[28]

CEQA requires an analysis of human health impacts. CEQA Guidelines Section 15065(a)(4) provides that the City is required to find a project will have a significant impact on the environment and require an EIR if the environmental effects of a project will cause a substantial adverse effect on human beings.[29] The Supreme Court has also explained that CEQA requires the lead agency to disclose the health consequences that result from exposure to a project's air emissions.[30]

For development projects like 7056 North Prospect Project, and ministerial ones under the Project, the Office of Environmental Health Hazard Assessment's ("**OEHHA**") risk assessment guidelines recommend a formal health risk analysis ("**HRA**") for short-term construction exposures to TACs lasting longer than 2 months and exposures from projects lasting more than 6 months should be evaluated for the duration of the project.[31] In an HRA, lead agencies must first quantify the concentration released into the environment at each of the sensitive receptor locations through air dispersion modeling, calculate the dose of each TAC at that location, and quantify the

[26] Clark Comments, pg. 5.
[27] Clark Comments, pg. 6.
[28] Clark Comments, pg. 9.
[29] 14 CCR § 15065(a)(4); PRC § 21083(b)(3), (d).
[30] *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, 516, 523.
[31] Office of Environmental Health Hazard Assessment (OEHHA), Risk Assessment Guidelines: Guidance Manual for Preparation of Health Risk Assessments, February 2015 (OEHHA 2015), Section 8.2.10: Cancer Risk Evaluation of Short Term Projects, pp. 8-17/18; https://oehha.ca.gov/air/crnr/notice adoption air toxics hot spots program guidance manual preparation-health-risk-0

cancer risk and hazard index for each of the chemicals of concern.[32] Following that analysis, then the City can make a determination of the relative significance of the emissions.

The City did not conduct this analysis. Here, the MND concludes that the Project would not result in significant health risk impacts without conducting any of the above analytical steps. The City fails to disclose or analyze that the actual construction of residential units as described in the Project construction and operation would result in emissions of TACs. For example, the MND's analysis regarding TACs only focuses on not siting residential units near certain uses[33] The City fails to analyze that construction from 4,868 units could, in and of itself, result in TACs from construction.[34] Next, the City fails to disclose or analyze the health impacts of exposure to certain concentrations of TACs. Then the City fails to quantify the magnitude of TACs emitted by the Project. Lastly, the City fails to model the concentrations of TACs at sensitive receptors.[35] In sum, there is no evidence that the City considered health risks from TACs due to the construction of residential units themselves when determining that the Project's ministerial developments would not result in significant impacts on air quality and public health.

2. The City's Significance Standards Rely on the Small Project Analysis Level to Screen Out Projects Based On Size, But The MND Does Not Then Require Projects to Perform Site Specific Analysis Despite the San Joaquin Valley Air Pollution Control District Requiring It for TACs and Sensitive Receptors

The City reasons that because of the scale and scope of the residential units under the Project, if the residential projects qualify under the Small Project Analysis Level ("**SPAL**"), there would be no contributions to air quality impacts.[36] The SPAL specifically notes that the significance standards for dwelling units and trip counts are to quantify significance standards for "criteria pollutant emissions for CEQA purposes."[37] It does not address significance standards for TACs.

[32] *Id.*
[33] MND pgs. 58-59.
[34] *Id.*; MND pg. 53.
[35] The City's failure to analyze the magnitude and concentration of the Project's TACs also conflicts with the OEHHA recommendations for HRAs. The OEHHA guidelines recommend an HRA be prepared for this Project's construction and operation because its 24-month construction schedule exceeds 2 months, and its operations would last over 6 months.
[36] MND, pg. 54.
[37] SJVAPCD. (2015). Air Quality Thresholds of Significance-Criteria Pollutants. Accessed on December 27, 2024, https://ww2.valleyair.org/media/m2ecyxiw/1-cms-format-ceqa-air-quality-thresholds-of-significance-criteria-pollutants.pdf

When reviewing the Guidance for Assessing and Mitigating Air Quality Impacts ("**GAMAQI**") put forth by the San Joaquin Valley Air Pollution Control District ("**SJVAPCD**").[38] This guidance notes that:

> When a project falls under the SPAL, the Lead Agency should use the information in the initial study checklist, or whatever format used, to justify a finding of less than significant air quality impacts. **The initial study should also verify that no sensitive receptors would be exposed to substantial pollutant concentrations as a result of the project**. Project size, as identified in the SPAL, is not a threshold of significance. SPAL is a screening tool. **The Lead Agency has the responsibility to identify and avoid potential land use conflicts, such as potential exposure of sensitive receptors to sources of toxic air contaminants**, sources of hazardous materials, and potential odors. (emphasis added).[39]

While the SPAL has since 2015 been adopted as a significance standard for criteria pollutants, it has not been adopted for TACs. The City clearly ignored the guidance's recommendations on TACs, and therefore, its conclusions are not supported by substantial evidence and do not mitigate the specific adverse impacts identified below. As SJVAPCD notes, just because a project qualifies as a SPAL, does not mean the project will have no environmental impacts. GAMAQI notes that the Lead Agency is responsible for identifying and avoiding potential exposure of TACs to sensitive receptors. Here, the MND analyzes TACs, but only so far as where to site residential units, not whether the construction of those units can create TACs themselves. Therefore, the City failed to analyze health risk impacts from exposure to TACs during the Project's expected construction of residential units and thus failed to support its finding of a less-than-significant health risk impact.

3. <u>The Project has Potentially Significant Health Risk Impacts from Projects Which Will Now Be Ministerial</u>

Dr. Clark calculated that the 7056 North Prospect Project's emissions of DPM would exceed applicable significance thresholds for health risks set by the SJVAPCD.

Using OEHHA's HARP 2 Standalone Risk software, Dr. Clark calculated the cancer risk to the most sensitive population – infants less than 3 years old.[40] The maximum risk for exposure during construction is 21.5 in 1,000,000, which is greater than the 20 in 1,000,000 threshold set

[38] *Id* at p. 6.
[39] Guidance for Assessing and Mitigating Air Quality Impacts, San Joaquin Valley Air Pollution Control District, p. 86, available at https://www.valleyair.org/transportation/GAMAQI-2015/FINAL-DRAFT-GAMAQI.PDF#page=86
[40] Clark Comments, pg. 10.

forth by the SJVAPCD for the maximally exposed individual. Dr. Clark's modeling even shows which receptors will be subject to these potentially significant impacts.[41]

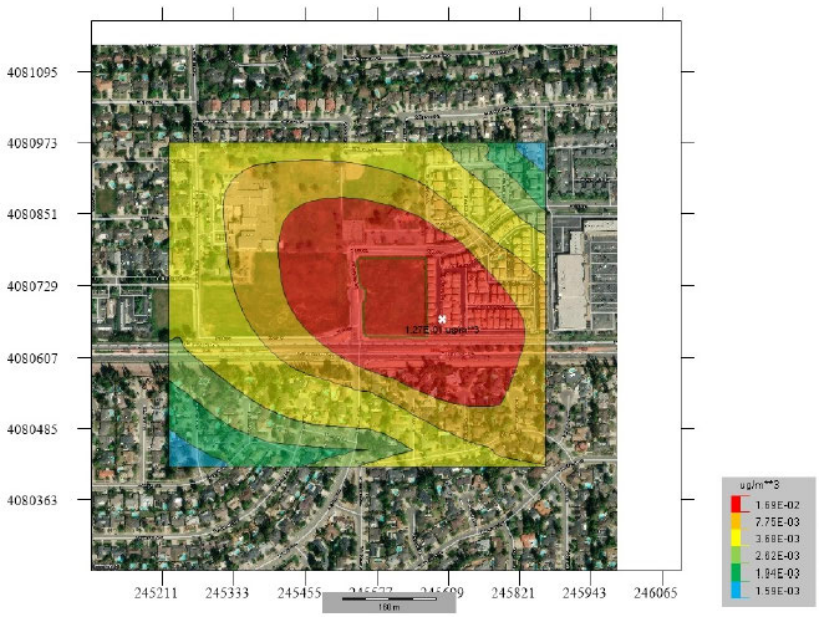



**Figure 6: Model output showing DPM concentrations from 2024 through 2025**

As a result of these significant effects, the 7056 North Prospect Project did not qualify for any CEQA exemption, including a Class 32 exemption. Here, the Project would allow projects the same size as the 7056 North Prospect Project ***and up to 2.5 times larger to not undergo any site-specific analysis***. Thus, it is fair to conclude those projects also could create significant impacts that must be disclosed and mitigated in an EIR.

## B. <u>There is Substantial Evidence Supporting a Fair Argument that the MND Underestimates and Fails to Properly Mitigate Noise Impacts</u>

### 1. <u>The City Lacks Substantial Evidence to Conclude That the Project's Noise Impacts From Construction are Less Than Significant</u>

The MND states that the Project would result in less-than-significant construction noise impacts, because "[i]t is not anticipated that future residential development would generate substantial temporary or permanent increase in existing ambient noise levels within the Project Area in excess of standards established in the General Plan or FMC, or in other applicable local, state, or federal standards."[42] This is the extent of the City's analysis regarding construction impacts and the basis for its significance determination. The City fails to provide why it believes

[41] *Id*.
[42] MND, pg. 139.

construction impacts are not anticipated, what assumptions that belief is based upon, or a supporting factual basis for this conclusion.

Courts have held that compliance with noise regulations alone is not substantial evidence of a less-than-significant impact.[43] In *Oro Fino Gold Mining Corp. v. County of El Dorado* ("*Oro Fino*"),[44] a mining company applied for a special use permit for drilling holes to explore for minerals.[45] The mining company argued the proposed mitigated negative declaration prohibited noise levels above the applicable county general plan noise standard maximum of 50 dBA and, therefore, there could be no significant noise impact. The court rejected this argument: "we note that conformity with a general plan does not insulate a project from EIR review where it can be fairly argued that the project will generate significant environmental effects."[46] Thus, the court concluded an EIR was required.

In *Citizens for Responsible & Open Government v. City of Grand Terrace* ("*Grand Terrace*"),[47] the city approved a 120-unit senior housing facility based on a mitigated negative declaration.[48] The noise element of the city's general plan stated exterior noise levels in residential areas should be limited to 65 dB CNEL.[49] The initial study concluded the facility's air conditioner units would cause noise impacts, but with mitigating measures the project would operate within the general plan's noise standard. But the court cited *Oro Fino* for the principle that "'conformity with a general plan does not insulate a project from EIR review where it can be fairly argued that the project will generate significant environmental effects.'"[50] A citizen's group provided substantial evidence supporting such a fair argument. This evidence included testimony from an individual in the HVAC industry that the type of air conditioning units proposed by the project "sound like airplanes."[51] And at a city council public hearing, community and city council members expressed concern that the air conditioners would be noisy.[52] The court considered the testimony about the noise generated by the proposed air conditioners, took into account the mitigation measures, and concluded "there is substantial

[43] *King & Gardiner Farms, LLC v. Cnty. of Kern* (2020) 45 Cal.App.5th 814, 865.
[44] (1990) 225 Cal.App.3d 872.
[45] *Id.* at pg. 876; *see also Keep our Mountains Quiet v. County of Santa Clara* (2015) 236 Cal.App.4th 714; *Citizens for Responsible & Open Government v. City of Grand Terrace* (2008) 160 Cal.App.4th 1323, 1338; *Gentry v. City of Murrieta* (1995) 36 Cal.App.4th 1359, 1416 (project's effects can be significant even if "they are not greater than those deemed acceptable in a general plan"); *Environmental Planning & Information Council v. County of El Dorado* (1982) 131 Cal.App.3d 350, 354, ("CEQA nowhere calls for evaluation of the impacts of a proposed project on an existing general plan").
[46] *Id.* at pp. 881–882.
[47] (2008) 160 Cal.App.4th 1323.
[48] Id. at 1327.
[49] *Grand Terrace*, 160 Cal.App.4th at 1338.
[50] *Grand Terrace*, *supra*, at pg. 1338.
[51] *Id.* at 1338-1339.
[52] *Id.* at 1338.

evidence that it can be fairly argued that the Project may have a significant environmental noise impact."[53]

Here the City's conclusions regarding impacts from Construction Noise are not supported by substantial evidence because the City did not perform any analysis to reach said conclusions. Mr. Watry notes that it is possible for a project to cause significant environmental noise impacts regardless of whether the Fresno Municipal Code makes this type of noise a violation.[54] The City merely assumed that compliance with the City's noise ordinance means it is impossible for there to also be construction noise impacts. This conflation is wrong and violates CEQA.

2. The Project has Potentially Significant Construction Noise Impacts

To further demonstrate this, Mr. Watry performed a construction noise analysis for the 7056 North Prospect Project and found that construction noise would exceed the residential noise thresholds of 55 dB from 7:00 p.m. to 10:00 p.m. and 60 dB from 7 a.m. to 7 p.m.[55] Mr. Watry recited the City's noise ordinance which described what noise levels are usually prima facie noise violations:

> Any noise or sound exceeding the ambient noise level at the property line of any person offended thereby, or, if a condominium or apartment house, within any adjoining living unit, by more than five decibels shall be deemed to be prima facie evidence of a violation of Section 8-305.[56]

Mr. Watry used this value combined with a significant buffer of an additional 5 dBA to determine what level of noise impacts could constitute potentially significant noise impacts for the 7056 North Prospect Project.[57] Using the Environmental Protection Agency's values for Residential Construction Noise, Mr. Watry concluded that every phase of construction for the 7056 North Prospect Project would exceed the residential thresholds by at least 10 dBA significance threshold for residential. While every phase of construction will exceed 70 dBA, some will significantly exceed this based on the average EPA Noise Levels for each phase of construction:[58]

[53] *Id.* at p. 1341.
[54] Watry Comments, p. 2.
[55] Watry Comments, p. 5.
[56] FMC sec. 10-106.
[57] Watry Comments, p. 4.
[58] Watry Comments, p. 3.

**TABLE I EPA NOISE LEVELS FOR RESIDENTIAL CONSTRUCTION**

| Phase | Average | Range‡ |
|---|---|---|
| Ground clearing | 83 dBA | 75 to 91 dBA |
| Excavation | 88 | 80 to 96 |
| Foundations | 81 | 71 to 91 |
| Erection | 81 | 71 to 91 |
| Finishing | 88 | 81 to 95 |

As such the MND's conclusions regarding impacts from Construction Noise are not supported by substantial evidence because the City failed to analyze construction noise impacts or present substantial evidence that there will not be potentially significant construction noise impacts. Presumably, there will be many sites in the Project Area that have similar amounts of sensitive receptors as the 7056 North Prospect Project. This amount of proposed residential development means many current residents will face significant impacts that are not accounted for in this MND.

As a result of these significant effects, the Project's impacts on Noise are significant and not mitigated. The Project's significant impacts must be disclosed and mitigated in an EIR.

### C. There is Substantial Evidence Supporting a Fair Argument that the MND Underestimates and Fails to Properly Mitigate Transportation Impacts

There is substantial evidence supporting a fair argument that the City failed to analyze transportation risk impacts of potential project construction and operation on nearby sensitive receptors, which could occur under future projects that would now be ministerial.

Here, the City also failed to review the Project's pedestrian and bicycle safety impacts, for Projects of less than 200 units. For instance, given 7056 North Prospect Project's density and proximity to the Tatarian Elementary School and Orchard Park, many existing neighbors, with eye-witness experience, and the Fresno Unified School District President Susan Wittrup commented on present traffic and pedestrian safety issues that would be exacerbated by the 7056 North Prospect Project.[59]

These comments were for a development that only envisioned 88 units, far below the City's now proposed 200-unit threshold which could occur without analyzing these issues. The City provides no basis or analysis on why 200 units is an appropriate threshold for providing no analysis on pedestrian and bicycle safety impacts. As such the City's conclusions regarding

[59] Fresno City Council Agenda for July 25, 2024 Meeting Agenda Item ID 24-899, Exhibit O, pg. 8-9, available at ID 24-899 - Exhibit O - Correspondence Received (legistar.com).

Transportation impacts are not supported by substantial evidence and do not support the use of an exemption.

## V. CONCLUSION

Northwest Neighbors for Safe Development respectfully requests that the Planning Commission require the Project to undergo an EIR or recirculate the MND after adding inappropriate levels of mitigation to reduce impact levels to insignificant.

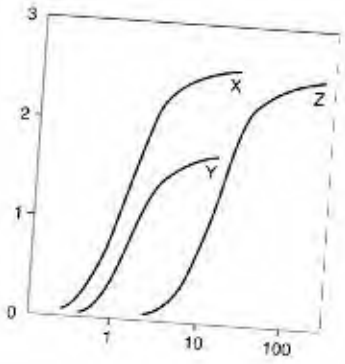
Sincerely,

FENNEMORE DOWLING AARON

Christopher A. Brown

CBRO/mrh
Attachments
cc: Andrew Janz (Andrew.Janz@fresno.gov)

# EXHIBIT A

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July 19, 2024

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**Attn: Mr. Chris Brown**

**Subject: Comment Letter on Categorical Exemption For The 7056 North Prospect Avenue Project Categorical Exemption (CE) From The City Of Fresno, California**

Dear Mr. Brown:

At the request of Fennemore Law (FL), Clark and Associates (Clark) has reviewed materials related to the February 9, 204 Categorical Exemption (CE) from the City of Fresno (the City) of the above referenced project. The Class 32 CE is proposed for the Project without consideration of the substantial air quality impacts that will be placed on the surrounding neighborhood. The project involves the construction of an 82-unit private gated multi-family development immediately adjacent to existing single-family residential neighborhood located east of the Project Site.

Clark's review of the materials in no way constitutes a validation of the conclusions or materials contained within the CE. If we do not comment on a specific item, this does not constitute acceptance of the item.

The project proposes on-site and off-site improvements including, but not limited to, three (3) three-story multifamily residential buildings and one (1) four-story building multifamily residential building consisting of 74 two-bedroom/two bathroom dwelling units and eight (8) two-bedroom/one bathroom dwelling units, one (1) approximately 1,907 square-foot one-story community center building, one (1) swimming pool area, one (1) dog park area, 154 parking spaces (27 single-car garages, 72 covered carport parking spaces, and 55 uncovered parking

spaces), and 6 long-term bicycle parking spaces. Direct access to the development will only be provided from North Prospect Avenue via a private gated entrance. One (1) emergency vehicle access approach is proposed along West Fir Avenue. Three (3) private pedestrian gates will be provided along West Fir Avenue and two (2) private pedestrian gates will be provided along North Prospect Avenue.

**Existing Conditions**

The Project Site is currently vacant and undeveloped. The proposed project is located within City limits, occurs on a vacant site of approximately 3.7 acres, which is less than the five-acre maximum, and is surrounded by other urban uses. An existing single-family residential neighborhood is located east of the project site. The property to the west is currently vacant and planned and zoned for Employment – Offices uses. The property to the north has been developed with a neighborhood park (Orchid Park). Properties further to the northwest and northeast have been developed with an elementary school (H. Roger Tatarian Elementary School) and single-family residential neighborhoods.




**Figure 1: Project Site Location**

**General Comments:**

No attempt has been made to quantify the emissions from the construction and operational phases of the Project. The City argues that using the project type, size, and number of vehicle trips, the San Joaquin Valley Air Pollution Control District (SJV-APCD) has prequantified emissions and determined values below which it is reasonable to conclude that a project would not exceed applicable thresholds of significance for criteria pollutants. The goes on to state that according to the Small Project Analysis Level (SPAL) Table 1 Residential, Apartment, Mid- Rise with a size of 225 dwelling units and 800 or less average daily one-way trips for all fleet types of 800 or less are deemed to be less than significant. Using the ITE Trip Generation Rates 11th Edition, the subject project (82-unit apartments) would generate 461 average daily trips (two-way trips). Thus, it is less than the SPAL 800 average daily one-way trip threshold. The project as described will not occur at a scale or scope with potential to contribute substantially or cumulatively to existing or projected air quality violations or impacts. This analysis fails to consider the impacts from construction activities at the Project Site and the release of toxic air contaminants (TACs), primarily in the form of diesel particulate matter (DPM) from the construction equipment, onto the adjacent homes. The City's failure to analyze for the health risks associated with the Project ignores the potentially significant impacts which must be analyzed in an environmental impact report (EIR).

**Specific Comments:**

1. **The City Failed To Perform An Air Quality Analysis Of The Project's Construction And Operational Phases.**

Using the current version of the CalEEMOD (Version 2020.4.0) software I have calculated the unmitigated emissions from the construction phase and operational of the Project. The results are attached as Exhibit A to this letter. Using the data contained in the project description and attached drawings (available from the City's website ). The modeled Project is outlined in the figure below.

1.2. Land Use Types

| Land Use Subtype | Size | Unit | Lot Acreage | Building Area (sq ft) | Landscape Area (sq ft) | Special Landscape Area (sq ft) | Population | Description |
|---|---|---|---|---|---|---|---|---|
| Apartments Mid Rise | 82.0 | Dwelling Unit | 3.70 | 54,293 | 64,835 | — | 262 | — |
| Parking Lot | 40.6 | 1000sqft | 0.93 | 0.00 | — | — | — | — |

**Figure 2: Project Description For CalEEMOD Analysis**

Using the default settings from CalEEMOD, a Project construction schedule was derived. The schedule included 5 distinct phases of work including site preparation, grading, building construction, paving of parking, and application of architectural coatings. Each phase was assumed to be distinct and no overlapping of emissions was assumed.

5.1. Construction Schedule

| Phase Name | Phase Type | Start Date | End Date | Days Per Week | Work Days per Phase | Phase Description |
|---|---|---|---|---|---|---|
| Site Preparation | Site Preparation | 8/30/2024 | 9/6/2024 | 5.00 | 5.00 | — |
| Grading | Grading | 9/7/2024 | 9/18/2024 | 5.00 | 8.00 | — |
| Building Construction | Building Construction | 9/19/2024 | 8/7/2025 | 5.00 | 230 | — |
| Paving | Paving | 8/8/2025 | 9/2/2025 | 5.00 | 18.0 | — |
| Architectural Coating | Architectural Coating | 9/3/2025 | 9/28/2025 | 5.00 | 18.0 | — |

**Figure 3: Default Construction Schedule**

The CalEEMOD model allows users to select the types of construction equipment available for each phase, hours of operation, along with the emission controls that may be in place. The modeled construction equipment was assumed to be the averaged value of the fleet available currently.

The CalEEMOD analysis generates daily and annual emission values of total organic gases (TOGs), reactive organic gases (ROGs), oxides of nitrogen ($NO_x$), carbon dioxide (CO), sulfur dioxide (SO2), particulate matter less than ten microns as exhaust ($PM_{10E}$), particulate matter less than ten microns as dust ($PM_{10D}$), total $PM_{10}$, particulate matter less than 2.5 microns as exhaust ($PM_{2.5E}$), particulate matter less than 2.5 microns as dust ($PM2_{2.5D}$), total $PM_{2.5}$, and greenhouse gases. Based on the CalEEMOD analysis, the Project would not exceed the regulatory thresholds for the criteria pollutants listed by SJV-APCD.

| Pollutant/Precursor | Construction Emissions | Operational Emissions | |
|---|---|---|---|
| | | Permitted Equipment and Activities | Non-Permitted Equipment and Activities |
| | Emissions (tpy) | Emissions (tpy) | Emissions (tpy) |
| CO | 100 | 100 | 100 |
| NOx | 10 | 10 | 10 |
| ROG | 10 | 10 | 10 |
| SOx | 27 | 27 | 27 |
| $PM_{10}$ | 15 | 15 | 15 |
| PM2.5 | 15 | 15 | 15 |

**Figure 4: SJV-APCD Significance Thresholds For Pollutants**

The results of the model's output of $PM_{10E}$ though was used in the next part of my analysis to determine if the emissions would exceed the SJV-APCD's risk threshold (a cancer risk of 20 in 1,000,000).

## 2. Diesel Exhaust From Construction Equipment Is Toxic And Must Be Evaluated Quantitatively To Determine The Health Impacts On The Nearest Sensitive Receptor(s)

Diesel exhaust, in particular DPM, is classified by the State of California as a TAC. TACs, including DPM[1], contribute to a host of respiratory impacts and may lead to the development of various cancers. Failing to quantify the carcinogenic and other health risk impacts places the community at risk for unwanted adverse health impacts. *Even brief exposures to the TACs could lead to the development of adverse health impacts over the life of an individual.*

Diesel exhaust contains nearly 40 toxic substances, including TACs, and may pose a serious public health risk for residents in the vicinity of the Project. TACs are airborne substances that are capable of causing short-term (acute) and/or long-term (chronic or carcinogenic, i.e., cancer causing) adverse human health effects (i.e., injury or illness). TACs include both organic and inorganic

[1] Because DPM is a TAC, it is a different air pollutant than criteria particulate matter (PM) emissions such as PM10, PM2.5, and fugitive dust. DPM exposure causes acute health effects that are different from the effects of exposure to PM alone.

chemical substances. The current California list of TACs includes approximately 200 compounds, including particulate emissions from diesel-fueled engines.

Diesel exhaust has been linked to a range of serious health problems including an increase in respiratory disease, lung damage, cancer, and premature death.[2,3,4] Fine DPM is deposited deep in the lungs in the smallest airways and can result in increased respiratory symptoms and disease; decreased lung function, particularly in children and individuals with asthma; alterations in lung tissue and respiratory tract defense mechanisms; and premature death.[5] Exposure to DPM increases the risk of lung cancer. It also causes non-cancer effects including chronic bronchitis, inflammation of lung tissue, thickening of the alveolar walls, immunological allergic reactions, and airway constriction.[6] DPM is a TAC that is recognized by state and federal agencies as causing severe health risk because it contains toxic materials, unlike $PM_{2.5}$ and $PM_{10}$.[7]

Nearby sensitive receptors would be exposed to TACs released during Project construction and operation, including DPM. The nearest sensitive receptors to the Project include the single-family residential neighborhood is located east of the Project Site, the elementary school to the west of the Project Site, and the remaining residences to the southwest and southeast of the Project Site.

The City must assess the air quality impacts for all TACs that will be released during the construction and operational phases of the project. CARB[8] defines diesel exhaust as a complex mixture

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[2] California Air Resources Board, Initial Statement of Reasons for Rulemaking, Proposed Identification of Diesel Exhaust as a Toxic Air Contaminant, Staff Report, June 1998; see also California Air Resources Board, Overview: Diesel Exhaust & Health, https://ww2.arb.ca.gov/resources/overview-diesel-exhaust-and-health#:~:text=Diesel%20Particulate%20Matter%20and%20Health&text=In%201998%2C%20CARB%20identified%20DPM,and%20other%20adverse%20health%20effects.

[3] U.S. EPA, Health Assessment Document for Diesel Engine Exhaust, Report EPA/600/8-90/057F, May 2002.

[4] Environmental Defense Fund, Cleaner Diesel Handbook, Bring Cleaner Fuel and Diesel Retrofits into Your Neighborhood, April 2005; http://www.edf.org/documents/4941_cleanerdieselhandbook.pdf, accessed July 5, 2020.

[5] California Air Resources Board, Initial Statement of Reasons for Rulemaking, Proposed Identification of Diesel Exhaust as a Toxic Air Contaminant, Staff Report, June 1998.

[6] Findings of the Scientific Review Panel on The Report on Diesel Exhaust as adopted at the Panel's April 22, 1998 Meeting.

[7] Health & Safety Code § 39655(a) (defining "toxic air contaminant" as air pollutants "which may cause or contribute to an increase in mortality or in serious illness, or which may pose a present or potential hazard to human health. A substance that is listed as a hazardous air pollutant pursuant to subsection (b) of Section 112 of the federal act (42 U.S.C. Sec. 7412 (b)) is a toxic air contaminant.")

[8] CARB. 1998. Report to the Air Resources Board on the Proposed Identification of Diesel Exhaust as a Toxic Air Contaminant, Part A, Public Exposure To, Sources and Emissions of Diesel Exhaust In California. April 22, 1998. Pg A-1.

of inorganic and organic compounds that exists in gaseous, liquid, and solid phases. CARB and U.S. EPA identify 40 components of the exhaust as suspected human carcinogens, including formaldehyde, 1,3-butadiene, and benzo[a]pyrene. The inhalation unit risk factor identified by OEHHA for use in risk assessments is for the particulate matter (DPM) fraction of diesel exhaust and not the vapor phase components identified by CARB and U.S. EPA.

There is notable precedent requiring a quantitative analysis of TACs from diesel exhaust in CEQA documents. Moreover, the absence of this analysis renders the CE's Air Quality Analysis incomplete. For example, in a 2017 Notice of Preparation of a CEQA Document For the Los Robles Apartments Project, from the SCAQMD[9] noted that:

"In the event that the proposed project generates or attracts vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the lead agency perform a mobile source health risk assessment. Guidance for performing a mobile source health risk assessment ("Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis") can be found at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysishandbook/mobile-source-toxics-analysis. An analysis of all toxic air contaminant impacts due to the use of equipment potentially generating such air pollutants should also be included." This is a common and feasible analysis that is routinely performed for development projects like the 7056 North Prospect Project.

No effort is made in the CE to quantify the potential health impacts from DPM generated by construction activities or operational activities from the Project on nearby receptors. The City's failure to perform such an analysis is clearly a major flaw in the CE and may be placing the nearby residents at risk from the construction and operational phases of the Project.

### 3. Using The Results Of The CalEEMOD Analysis I Have Constructed An Air Dispersion Model Of The Emissions And Calculated That The Health Risk From DPM Emissions Will Exceed The SJC-APCD's Risk Significance Threshold Of 20 In One Million.

Using the model described above, a total of 123.6 pounds of DPM were calculated to be emitted from the construction phase of the Project. The Project construction phase will last approximately 279

[9] SCAQMD. 2017. Comment Letter To David Sanchez, Senior Planner City of Pasadena from Jillian Wong, Planning and Rules Manager, SCAQMD.

work days and would last a total of 1.03 years (workdays plus holidays, plus weekends).

| Phase | Year | Emissions | Duration | Total Emissions For Phase |
|---|---|---|---|---|
| | | lbs/day | days | lbs |
| Site Preparation | 2024 | 1.6 | 5 | 8 |
| Grading | 2024 | 0.84 | 8 | 6.72 |
| Building Construction | 2024 | 0.5 | 68 | 34 |
| Building Construction | 2025 | 0.43 | 162 | 69.66 |
| Paving | 2025 | 0.29 | 18 | 5.22 |
| Architectural Coating | 2025 | 0.03 | 18 | 0.54 |
| Total | | | 279 | 123.6 |

The construction site is assumed to be approximately 3.7 acres or approximately 1.61 E+05 square feet. Limiting the emissions to an 8-hour period during weekdays, the time weight averaged emission rate for 2024 through 2025 was calculated to be $3.46 \times 10^{-7}$ lbs per hour of operation per square feet.

AERMOD is an acronym for the American Meteorological Society/Environmental Protection Agency Regulatory Model Improvement Committee's Dispersion Model. AERMOD contains the necessary algorithms to model air concentrations from a wide range of emission source types, including stack-based point sources, fugitive area sources, and volume sources. The modeling domain with the Project Site are indicated in the figure below. The green area is the source area of DPM from construction of the Project.




**Figure 5: Model Domain And Receptors**

Using the 5-year meteorological data from SJV-APCD for the Fresno Airport monitoring station (closest met station to the Project site), limiting the emissions to an 8-hour period on weekdays, the concentrations at the nearest receptors were calculated and are summarized below. The results are presented in Exhibit B to this letter.

Table 2: Annual Average DPM Concentrations Modeled For Construction Phase

| 2018 | 2019 | 2020 | 2021 | 2022 |
|---|---|---|---|---|
| $ug/m^3$ | $ug/m^3$ | $ug/m^3$ | $ug/m^3$ | $ug/m^3$ |
| 1.27E-01 | 1.09E-01 | 1.06E-01 | 1.21E-01 | 1.26E-01 |

Assuming that emissions will be limited to an eight-hour period during weekdays, it is possible to calculate an averaged emissions over the whole construction site. Using AERMOD, the US EPA's

preferred air dispersion model, it is possible to calculate the concentrations of DPM from the construction area at the closest receptors near the construction site.

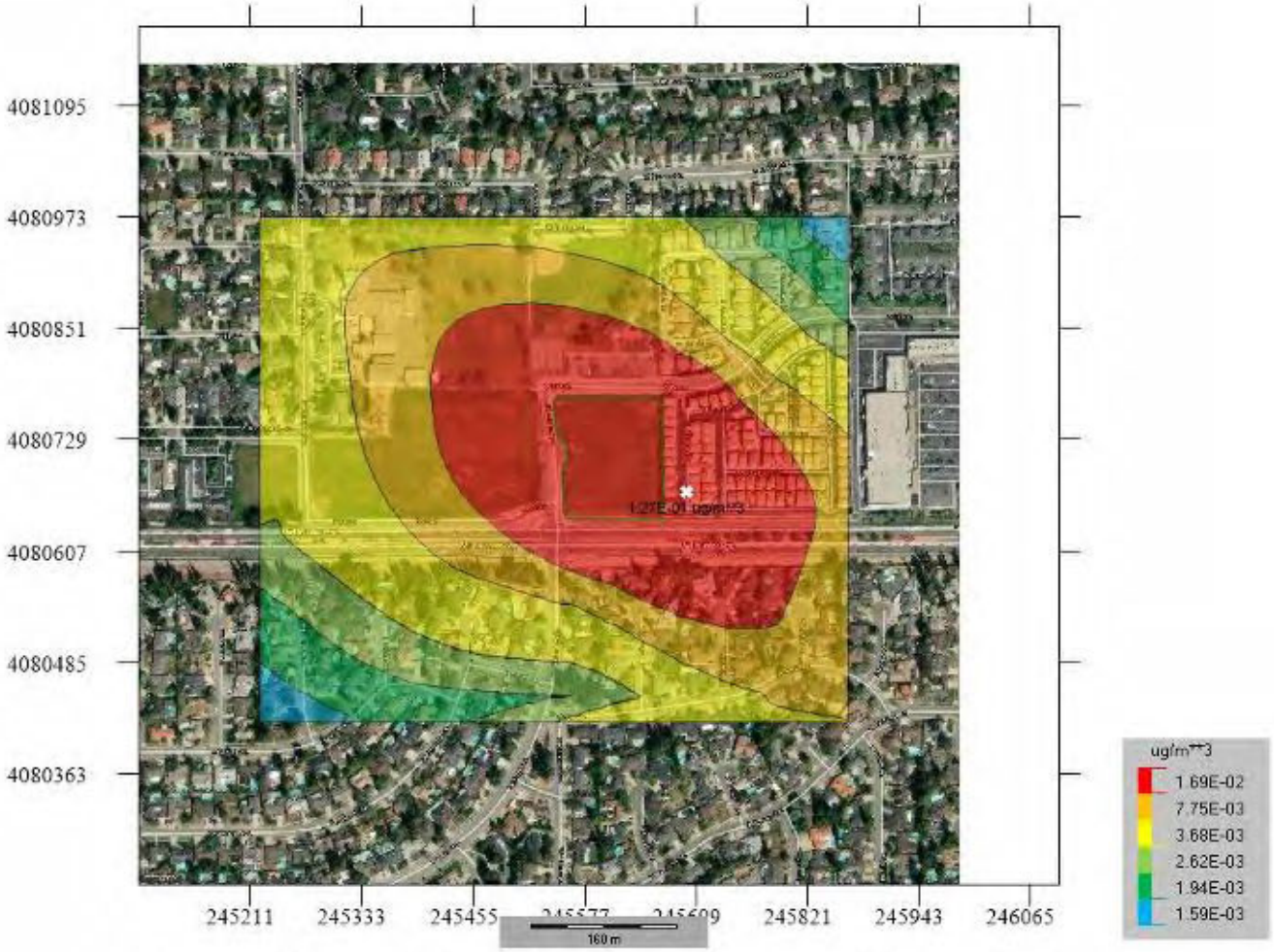


**Figure 6: Model output showing DPM concentrations from 2024 through 2025**

Based on the assumptions detailed above, the maximum averaged concentration of DPM from the construction phase of the project is 0.127 ug/m$^3$. The median value of the concentrations modeled at the same location is 0.121 ug/m$^3$.

Using the algorithms from OEHHA's HARP 2 Standalone Risk software, the cancer risk to the most sensitive population, infants less than 3 years old was calculated. The risk for exposure of infants during the 1 years of construction is 21.5 in 1,000,000 using the maximum concentration modeled, much greater than the 20 in 1,000,000 significance threshold outlined by SJV-APCD, resulting in a significant impact. The risk for exposure of infants during the 1 years of construction is

20.5 in 1,000,000 using the median concentration modeled, much greater than the 20 in 1,000,000 significance threshold outlined by SJV-APCD, resulting in a significant impact.

It is clear from the results above that the unmitigated emissions from the construction phase of the Project represent a significant risk if the CE were signed. The City must quantify and disclose these significant impacts in an EIR for the Project.

## Conclusion

The facts identified and referenced in this comment letter lead me to reasonably conclude that the Project could result in significant impacts if allowed to proceed. The City must prepare an EIR to address these substantial concerns and to address the errors presented in the CE.

Sincerely,



Exhibit A

CalEEMOD Analysis

# 7056 North Prospect Ave Detailed Report

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# 1. Basic Project Information

## 1.1. Basic Project Information

| Data Field | Value |
|---|---|
| Project Name | 7056 North Prospect Ave |
| Construction Start Date | 8/1/2024 |
| Operational Year | 2025 |
| Lead Agency | — |
| Land Use Scale | Project/site |
| Analysis Level for Defaults | County |
| Windspeed (m/s) | 2.70 |
| Precipitation (days) | 22.6 |
| Location | 36.83816901498409, -119.85291402629232 |
| County | Fresno |
| City | Fresno |
| Air District | San Joaquin Valley APCD |
| Air Basin | San Joaquin Valley |
| TAZ | 2425 |
| EDFZ | 5 |
| Electric Utility | Pacific Gas & Electric Company |
| Gas Utility | Pacific Gas & Electric |
| App Version | 2022.1.1.26 |

## 1.2. Land Use Types

| Land Use Subtype | Size | Unit | Lot Acreage | Building Area (sq ft) | Landscape Area (sq ft) | Special Landscape Area (sq ft) | Population | Description |
|---|---|---|---|---|---|---|---|---|
| Apartments Mid Rise | 82.0 | Dwelling Unit | 3.70 | 54,293 | 64,835 | — | 262 | — |

| | | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| Parking Lot | 40.6 | 1000sqft | 0.93 | 0.00 | — | — | — | — |

## 1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

# 2. Emissions Summary

## 2.1. Construction Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

| Un/Mit. | TOG | ROG | NOx | CO | SO2 | PM10E | PM10D | PM10T | PM2.5E | PM2.5D | PM2.5T | BCO2 | NBCO2 | CO2T | CH4 | N2O | R | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Daily, Summer (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Unmit. | 19.7 | 19.7 | 36.0 | 33.6 | 0.05 | 1.60 | 19.8 | 21.4 | 1.47 | 10.1 | 11.6 | — | 5,404 | 5,404 | 0.22 | 0.05 | 1.76 | 5,424 |
| Daily, Winter (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Unmit. | 1.70 | 1.44 | 11.6 | 15.1 | 0.02 | 0.50 | 0.35 | 0.85 | 0.46 | 0.08 | 0.54 | — | 2,840 | 2,840 | 0.12 | 0.05 | 0.05 | 2,858 |
| Average Daily (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Unmit. | 1.71 | 1.60 | 4.99 | 6.94 | 0.01 | 0.20 | 0.50 | 0.64 | 0.19 | 0.23 | 0.36 | — | 1,300 | 1,300 | 0.05 | 0.02 | 0.32 | 1,308 |
| Annual (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Unmit. | 0.31 | 0.29 | 0.91 | 1.27 | < 0.005 | 0.04 | 0.09 | 0.12 | 0.03 | 0.04 | 0.07 | — | 215 | 215 | 0.01 | < 0.005 | 0.05 | 217 |
| Exceeds (Annual) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Threshold | — | 10.0 | 10.0 | 100 | 27.0 | — | — | 15.0 | — | — | 15.0 | — | — | — | — | — | — | — |
| Unmit. | — | No | No | No | No | — | — | No | — | — | No | — | — | — | — | — | — | — |

## 2.2. Construction Emissions by Year, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

| Year | TOG | ROG | NOx | CO | SO2 | PM10E | PM10D | PM10T | PM2.5E | PM2.5D | PM2.5T | BCO2 | NBCO2 | CO2T | CH4 | N2O | R | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Daily - Summer (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| 2024 | 4.42 | 3.73 | 36.0 | 33.6 | 0.05 | 1.60 | 19.8 | 21.4 | 1.47 | 10.1 | 11.6 | — | 5,404 | 5,404 | 0.22 | 0.05 | 1.76 | 5,424 |
| 2025 | 19.7 | 19.7 | 10.8 | 15.3 | 0.02 | 0.43 | 0.35 | 0.78 | 0.40 | 0.08 | 0.48 | — | 2,871 | 2,871 | 0.11 | 0.05 | 1.64 | 2,891 |
| Daily - Winter (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| 2024 | 1.70 | 1.44 | 11.6 | 15.1 | 0.02 | 0.50 | 0.35 | 0.85 | 0.46 | 0.08 | 0.54 | — | 2,840 | 2,840 | 0.12 | 0.05 | 0.05 | 2,858 |
| 2025 | 1.60 | 1.35 | 10.8 | 14.9 | 0.02 | 0.43 | 0.35 | 0.78 | 0.40 | 0.08 | 0.48 | — | 2,831 | 2,831 | 0.11 | 0.05 | 0.04 | 2,849 |
| Average Daily | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| 2024 | 0.46 | 0.39 | 3.25 | 3.97 | 0.01 | 0.14 | 0.50 | 0.64 | 0.13 | 0.23 | 0.36 | — | 721 | 721 | 0.03 | 0.01 | 0.16 | 725 |
| 2025 | 1.71 | 1.60 | 4.99 | 6.94 | 0.01 | 0.20 | 0.16 | 0.36 | 0.19 | 0.04 | 0.22 | — | 1,300 | 1,300 | 0.05 | 0.02 | 0.32 | 1,308 |
| Annual | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| 2024 | 0.08 | 0.07 | 0.59 | 0.72 | < 0.005 | 0.03 | 0.09 | 0.12 | 0.02 | 0.04 | 0.07 | — | 119 | 119 | 0.01 | < 0.005 | 0.03 | 120 |
| 2025 | 0.31 | 0.29 | 0.91 | 1.27 | < 0.005 | 0.04 | 0.03 | 0.07 | 0.03 | 0.01 | 0.04 | — | 215 | 215 | 0.01 | < 0.005 | 0.05 | 217 |

## 2.4. Operations Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

| Un/Mit. | TOG | ROG | NOx | CO | SO2 | PM10E | PM10D | PM10T | PM2.5E | PM2.5D | PM2.5T | BCO2 | NBCO2 | CO2T | CH4 | N2O | R | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Daily, Summer (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Unmit. | 7.81 | 5.53 | 2.88 | 34.8 | 0.09 | 2.76 | 1.91 | 4.67 | 2.66 | 0.48 | 3.14 | 485 | 4,249 | 4,733 | 6.23 | 0.15 | 9.40 | 4,943 |
| Daily, Winter (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |

| | | | | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Unmit. | 7.16 | 4.89 | 3.03 | 29.0 | 0.09 | 2.76 | 1.91 | 4.67 | 2.66 | 0.48 | 3.14 | 485 | 4,033 | 4,518 | 6.25 | 0.16 | 0.62 | 4,722 |
| Average Daily (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Unmit. | 4.06 | 3.44 | 2.13 | 16.1 | 0.04 | 0.67 | 1.79 | 2.46 | 0.64 | 0.45 | 1.10 | 139 | 3,313 | 3,452 | 4.60 | 0.15 | 4.09 | 3,615 |
| Annual (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Unmit. | 0.74 | 0.63 | 0.39 | 2.93 | 0.01 | 0.12 | 0.33 | 0.45 | 0.12 | 0.08 | 0.20 | 23.0 | 549 | 572 | 0.76 | 0.02 | 0.68 | 598 |
| Exceeds (Annual) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Threshold | — | 10.0 | 10.0 | 100 | 27.0 | — | — | 15.0 | — | — | 15.0 | — | — | — | — | — | — | — |
| Unmit. | — | No | No | No | No | — | — | No | — | — | No | — | — | — | — | — | — | — |

## 2.5. Operations Emissions by Sector, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

| Sector | TOG | ROG | NOx | CO | SO2 | PM10E | PM10D | PM10T | PM2.5E | PM2.5D | PM2.5T | BCO2 | NBCO2 | CO2T | CH4 | N2O | R | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Daily, Summer (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Mobile | 1.84 | 1.74 | 1.34 | 11.1 | 0.02 | 0.02 | 1.91 | 1.93 | 0.02 | 0.48 | 0.50 | — | 2,458 | 2,458 | 0.12 | 0.13 | 9.01 | 2,507 |
| Area | 5.90 | 3.76 | 1.03 | 23.4 | 0.06 | 2.70 | — | 2.70 | 2.60 | — | 2.60 | 446 | 876 | 1,321 | 2.10 | < 0.005 | — | 1,374 |
| Energy | 0.06 | 0.03 | 0.52 | 0.22 | < 0.005 | 0.04 | — | 0.04 | 0.04 | — | 0.04 | — | 906 | 906 | 0.10 | 0.01 | — | 911 |
| Water | — | — | — | — | — | — | — | — | — | — | — | 6.33 | 8.74 | 15.1 | 0.65 | 0.02 | — | 36.0 |
| Waste | — | — | — | — | — | — | — | — | — | — | — | 32.6 | 0.00 | 32.6 | 3.26 | 0.00 | — | 114 |
| Refrig. | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | 0.39 | 0.39 |
| Total | 7.81 | 5.53 | 2.88 | 34.8 | 0.09 | 2.76 | 1.91 | 4.67 | 2.66 | 0.48 | 3.14 | 485 | 4,249 | 4,733 | 6.23 | 0.15 | 9.40 | 4,943 |
| Daily, Winter (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Mobile | 1.64 | 1.52 | 1.53 | 9.95 | 0.02 | 0.02 | 1.91 | 1.93 | 0.02 | 0.48 | 0.50 | — | 2,255 | 2,255 | 0.14 | 0.14 | 0.23 | 2,299 |

| | | | | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Area | 5.46 | 3.34 | 0.98 | 18.8 | 0.06 | 2.70 | — | 2.70 | 2.60 | — | 2.60 | 446 | 863 | 1,309 | 2.10 | < 0.005 | — | 1,362 |
| Energy | 0.06 | 0.03 | 0.52 | 0.22 | < 0.005 | 0.04 | — | 0.04 | 0.04 | — | 0.04 | — | 906 | 906 | 0.10 | 0.01 | — | 911 |
| Water | — | — | — | — | — | — | — | — | — | — | — | 6.33 | 8.74 | 15.1 | 0.65 | 0.02 | — | 36.0 |
| Waste | — | — | — | — | — | — | — | — | — | — | — | 32.6 | 0.00 | 32.6 | 3.26 | 0.00 | — | 114 |
| Refrig. | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | 0.39 | 0.39 |
| Total | 7.16 | 4.89 | 3.03 | 29.0 | 0.09 | 2.76 | 1.91 | 4.67 | 2.66 | 0.48 | 3.14 | 485 | 4,033 | 4,518 | 6.25 | 0.16 | 0.62 | 4,722 |
| Average Daily | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Mobile | 1.58 | 1.48 | 1.36 | 9.32 | 0.02 | 0.02 | 1.79 | 1.81 | 0.02 | 0.45 | 0.47 | — | 2,198 | 2,198 | 0.12 | 0.12 | 3.70 | 2,241 |
| Area | 2.42 | 1.93 | 0.24 | 6.51 | 0.01 | 0.61 | — | 0.61 | 0.58 | — | 0.58 | 100 | 200 | 300 | 0.47 | < 0.005 | — | 312 |
| Energy | 0.06 | 0.03 | 0.52 | 0.22 | < 0.005 | 0.04 | — | 0.04 | 0.04 | — | 0.04 | — | 906 | 906 | 0.10 | 0.01 | — | 911 |
| Water | — | — | — | — | — | — | — | — | — | — | — | 6.33 | 8.74 | 15.1 | 0.65 | 0.02 | — | 36.0 |
| Waste | — | — | — | — | — | — | — | — | — | — | — | 32.6 | 0.00 | 32.6 | 3.26 | 0.00 | — | 114 |
| Refrig. | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | 0.39 | 0.39 |
| Total | 4.06 | 3.44 | 2.13 | 16.1 | 0.04 | 0.67 | 1.79 | 2.46 | 0.64 | 0.45 | 1.10 | 139 | 3,313 | 3,452 | 4.60 | 0.15 | 4.09 | 3,615 |
| Annual | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Mobile | 0.29 | 0.27 | 0.25 | 1.70 | < 0.005 | < 0.005 | 0.33 | 0.33 | < 0.005 | 0.08 | 0.09 | — | 364 | 364 | 0.02 | 0.02 | 0.61 | 371 |
| Area | 0.44 | 0.35 | 0.04 | 1.19 | < 0.005 | 0.11 | — | 0.11 | 0.11 | — | 0.11 | 16.6 | 33.1 | 49.7 | 0.08 | < 0.005 | — | 51.7 |
| Energy | 0.01 | 0.01 | 0.10 | 0.04 | < 0.005 | 0.01 | — | 0.01 | 0.01 | — | 0.01 | — | 150 | 150 | 0.02 | < 0.005 | — | 151 |
| Water | — | — | — | — | — | — | — | — | — | — | — | 1.05 | 1.45 | 2.50 | 0.11 | < 0.005 | — | 5.96 |
| Waste | — | — | — | — | — | — | — | — | — | — | — | 5.40 | 0.00 | 5.40 | 0.54 | 0.00 | — | 18.9 |
| Refrig. | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | 0.06 | 0.06 |
| Total | 0.74 | 0.63 | 0.39 | 2.93 | 0.01 | 0.12 | 0.33 | 0.45 | 0.12 | 0.08 | 0.20 | 23.0 | 549 | 572 | 0.76 | 0.02 | 0.68 | 598 |

# 3. Construction Emissions Details

## 3.1. Site Preparation (2024) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

| Location | TOG | ROG | NOx | CO | SO2 | PM10E | PM10D | PM10T | PM2.5E | PM2.5D | PM2.5T | BCO2 | NBCO2 | CO2T | CH4 | N2O | R | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Onsite | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Daily, Summer (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Off-Road Equipment | 4.34 | 3.65 | 36.0 | 32.9 | 0.05 | 1.60 | — | 1.60 | 1.47 | — | 1.47 | — | 5,296 | 5,296 | 0.21 | 0.04 | — | 5,314 |
| Dust From Material Movement | — | — | — | — | — | — | 19.7 | 19.7 | — | 10.1 | 10.1 | — | — | — | — | — | — | — |
| Onsite truck | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Daily, Winter (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Average Daily | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Off-Road Equipment | 0.06 | 0.05 | 0.49 | 0.45 | < 0.005 | 0.02 | — | 0.02 | 0.02 | — | 0.02 | — | 72.5 | 72.5 | < 0.005 | < 0.005 | — | 72.8 |
| Dust From Material Movement | — | — | — | — | — | — | 0.27 | 0.27 | — | 0.14 | 0.14 | — | — | — | — | — | — | — |
| Onsite truck | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Annual | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Off-Road Equipment | 0.01 | 0.01 | 0.09 | 0.08 | < 0.005 | < 0.005 | — | < 0.005 | < 0.005 | — | < 0.005 | — | 12.0 | 12.0 | < 0.005 | < 0.005 | — | 12.1 |

| | | | | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Dust From Material Movement | — | — | — | — | — | — | 0.05 | 0.05 | — | 0.03 | 0.03 | — | — | — | — | — | — | — |
| Onsite truck | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Offsite | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Daily, Summer (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Worker | 0.08 | 0.08 | 0.04 | 0.71 | 0.00 | 0.00 | 0.10 | 0.10 | 0.00 | 0.02 | 0.02 | — | 108 | 108 | 0.01 | < 0.005 | 0.43 | 110 |
| Vendor | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Hauling | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Daily, Winter (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Average Daily | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Worker | < 0.005 | < 0.005 | < 0.005 | 0.01 | 0.00 | 0.00 | < 0.005 | < 0.005 | 0.00 | < 0.005 | < 0.005 | — | 1.36 | 1.36 | < 0.005 | < 0.005 | < 0.005 | 1.39 |
| Vendor | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Hauling | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Annual | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Worker | < 0.005 | < 0.005 | < 0.005 | < 0.005 | 0.00 | 0.00 | < 0.005 | < 0.005 | 0.00 | < 0.005 | < 0.005 | — | 0.23 | 0.23 | < 0.005 | < 0.005 | < 0.005 | 0.23 |
| Vendor | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Hauling | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

## 3.3. Grading (2024) - Unmitigated

### Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

| Location | TOG | ROG | NOx | CO | SO2 | PM10E | PM10D | PM10T | PM2.5E | PM2.5D | PM2.5T | BCO2 | NBCO2 | CO2T | CH4 | N2O | R | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Onsite | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |

| | | | | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Daily, Summer (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Off-Road Equipment | 2.26 | 1.90 | 18.2 | 18.8 | 0.03 | 0.84 | — | 0.84 | 0.77 | — | 0.77 | — | 2,958 | 2,958 | 0.12 | 0.02 | — | 2,969 |
| Dust From Material Movement | — | — | — | — | — | — | 7.08 | 7.08 | — | 3.42 | 3.42 | — | — | — | — | — | — | — |
| Onsite truck | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Daily, Winter (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Average Daily | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Off-Road Equipment | 0.05 | 0.04 | 0.40 | 0.41 | < 0.005 | 0.02 | — | 0.02 | 0.02 | — | 0.02 | — | 64.8 | 64.8 | < 0.005 | < 0.005 | — | 65.1 |
| Dust From Material Movement | — | — | — | — | — | — | 0.16 | 0.16 | — | 0.08 | 0.08 | — | — | — | — | — | — | — |
| Onsite truck | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Annual | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Off-Road Equipment | 0.01 | 0.01 | 0.07 | 0.08 | < 0.005 | < 0.005 | — | < 0.005 | < 0.005 | — | < 0.005 | — | 10.7 | 10.7 | < 0.005 | < 0.005 | — | 10.8 |
| Dust From Material Movement | — | — | — | — | — | — | 0.03 | 0.03 | — | 0.01 | 0.01 | — | — | — | — | — | — | — |

| | | | | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Onsite truck | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Offsite | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Daily, Summer (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Worker | 0.07 | 0.07 | 0.04 | 0.61 | 0.00 | 0.00 | 0.08 | 0.08 | 0.00 | 0.02 | 0.02 | — | 92.9 | 92.9 | 0.01 | < 0.005 | 0.37 | 94.6 |
| Vendor | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Hauling | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Daily, Winter (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Average Daily | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Worker | < 0.005 | < 0.005 | < 0.005 | 0.01 | 0.00 | 0.00 | < 0.005 | < 0.005 | 0.00 | < 0.005 | < 0.005 | — | 1.87 | 1.87 | < 0.005 | < 0.005 | < 0.005 | 1.90 |
| Vendor | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Hauling | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Annual | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Worker | < 0.005 | < 0.005 | < 0.005 | < 0.005 | 0.00 | 0.00 | < 0.005 | < 0.005 | 0.00 | < 0.005 | < 0.005 | — | 0.31 | 0.31 | < 0.005 | < 0.005 | < 0.005 | 0.32 |
| Vendor | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Hauling | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

## 3.5. Building Construction (2024) - Unmitigated

### Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

| Location | TOG | ROG | NOx | CO | SO2 | PM10E | PM10D | PM10T | PM2.5E | PM2.5D | PM2.5T | BCO2 | NBCO2 | CO2T | CH4 | N2O | R | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Onsite | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Daily, Summer (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |

| | | | | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Off-Road Equipment | 1.44 | 1.20 | 11.2 | 13.1 | 0.02 | 0.50 | — | 0.50 | 0.46 | — | 0.46 | — | 2,398 | 2,398 | 0.10 | 0.02 | — | 2,406 |
| Onsite truck | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Daily, Winter (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Off-Road Equipment | 1.44 | 1.20 | 11.2 | 13.1 | 0.02 | 0.50 | — | 0.50 | 0.46 | — | 0.46 | — | 2,398 | 2,398 | 0.10 | 0.02 | — | 2,406 |
| Onsite truck | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Average Daily | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Off-Road Equipment | 0.29 | 0.24 | 2.28 | 2.67 | < 0.005 | 0.10 | — | 0.10 | 0.09 | — | 0.09 | — | 488 | 488 | 0.02 | < 0.005 | — | 490 |
| Onsite truck | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Annual | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Off-Road Equipment | 0.05 | 0.04 | 0.42 | 0.49 | < 0.005 | 0.02 | — | 0.02 | 0.02 | — | 0.02 | — | 80.8 | 80.8 | < 0.005 | < 0.005 | — | 81.1 |
| Onsite truck | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Offsite | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Daily, Summer (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Worker | 0.29 | 0.27 | 0.15 | 2.40 | 0.00 | 0.00 | 0.32 | 0.32 | 0.00 | 0.08 | 0.08 | — | 366 | 366 | 0.02 | 0.02 | 1.46 | 372 |
| Vendor | 0.01 | 0.01 | 0.19 | 0.09 | < 0.005 | < 0.005 | 0.03 | 0.03 | < 0.005 | 0.01 | 0.01 | — | 117 | 117 | < 0.005 | 0.02 | 0.30 | 123 |

| | | | | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Hauling | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Daily, Winter (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Worker | 0.25 | 0.23 | 0.19 | 1.94 | 0.00 | 0.00 | 0.32 | 0.32 | 0.00 | 0.08 | 0.08 | — | 324 | 324 | 0.02 | 0.02 | 0.04 | 329 |
| Vendor | 0.01 | 0.01 | 0.20 | 0.09 | < 0.005 | < 0.005 | 0.03 | 0.03 | < 0.005 | 0.01 | 0.01 | — | 118 | 118 | < 0.005 | 0.02 | 0.01 | 123 |
| Hauling | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Average Daily | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Worker | 0.05 | 0.05 | 0.03 | 0.40 | 0.00 | 0.00 | 0.06 | 0.06 | 0.00 | 0.02 | 0.02 | — | 68.4 | 68.4 | < 0.005 | < 0.005 | 0.13 | 69.6 |
| Vendor | < 0.005 | < 0.005 | 0.04 | 0.02 | < 0.005 | < 0.005 | 0.01 | 0.01 | < 0.005 | < 0.005 | < 0.005 | — | 23.9 | 23.9 | < 0.005 | < 0.005 | 0.03 | 25.0 |
| Hauling | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Annual | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Worker | 0.01 | 0.01 | 0.01 | 0.07 | 0.00 | 0.00 | 0.01 | 0.01 | 0.00 | < 0.005 | < 0.005 | — | 11.3 | 11.3 | < 0.005 | < 0.005 | 0.02 | 11.5 |
| Vendor | < 0.005 | < 0.005 | 0.01 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | — | 3.96 | 3.96 | < 0.005 | < 0.005 | < 0.005 | 4.14 |
| Hauling | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

## 3.7. Building Construction (2025) - Unmitigated

### Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

| Location | TOG | ROG | NOx | CO | SO2 | PM10E | PM10D | PM10T | PM2.5E | PM2.5D | PM2.5T | BCO2 | NBCO2 | CO2T | CH4 | N2O | R | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Onsite | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Daily, Summer (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Off-Road Equipment | 1.35 | 1.13 | 10.4 | 13.0 | 0.02 | 0.43 | — | 0.43 | 0.40 | — | 0.40 | — | 2,398 | 2,398 | 0.10 | 0.02 | — | 2,406 |
| Onsite truck | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

| | | | | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Daily, Winter (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Off-Road Equipment | 1.35 | 1.13 | 10.4 | 13.0 | 0.02 | 0.43 | — | 0.43 | 0.40 | — | 0.40 | — | 2,398 | 2,398 | 0.10 | 0.02 | — | 2,406 |
| Onsite truck | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Average Daily | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Off-Road Equipment | 0.58 | 0.48 | 4.48 | 5.59 | 0.01 | 0.19 | — | 0.19 | 0.17 | — | 0.17 | — | 1,028 | 1,028 | 0.04 | 0.01 | — | 1,031 |
| Onsite truck | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Annual | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Off-Road Equipment | 0.11 | 0.09 | 0.82 | 1.02 | < 0.005 | 0.03 | — | 0.03 | 0.03 | — | 0.03 | — | 170 | 170 | 0.01 | < 0.005 | — | 171 |
| Onsite truck | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Offsite | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Daily, Summer (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Worker | 0.27 | 0.25 | 0.13 | 2.20 | 0.00 | 0.00 | 0.32 | 0.32 | 0.00 | 0.08 | 0.08 | — | 358 | 358 | 0.01 | 0.02 | 1.34 | 364 |
| Vendor | 0.01 | 0.01 | 0.19 | 0.08 | < 0.005 | < 0.005 | 0.03 | 0.03 | < 0.005 | 0.01 | 0.01 | — | 115 | 115 | < 0.005 | 0.02 | 0.30 | 121 |
| Hauling | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Daily, Winter (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Worker | 0.24 | 0.22 | 0.16 | 1.78 | 0.00 | 0.00 | 0.32 | 0.32 | 0.00 | 0.08 | 0.08 | — | 318 | 318 | 0.01 | 0.02 | 0.03 | 323 |

| | | | | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Vendor | 0.01 | 0.01 | 0.20 | 0.09 | < 0.005 | < 0.005 | 0.03 | 0.03 | < 0.005 | 0.01 | 0.01 | — | 116 | 116 | < 0.005 | 0.02 | 0.01 | 121 |
| Hauling | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Average Daily | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Worker | 0.10 | 0.10 | 0.06 | 0.78 | 0.00 | 0.00 | 0.14 | 0.14 | 0.00 | 0.03 | 0.03 | — | 141 | 141 | 0.01 | 0.01 | 0.25 | 143 |
| Vendor | < 0.005 | < 0.005 | 0.08 | 0.04 | < 0.005 | < 0.005 | 0.01 | 0.01 | < 0.005 | < 0.005 | < 0.005 | — | 49.5 | 49.5 | < 0.005 | 0.01 | 0.06 | 51.7 |
| Hauling | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Annual | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Worker | 0.02 | 0.02 | 0.01 | 0.14 | 0.00 | 0.00 | 0.02 | 0.02 | 0.00 | 0.01 | 0.01 | — | 23.3 | 23.3 | < 0.005 | < 0.005 | 0.04 | 23.7 |
| Vendor | < 0.005 | < 0.005 | 0.02 | 0.01 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | — | 8.19 | 8.19 | < 0.005 | < 0.005 | 0.01 | 8.56 |
| Hauling | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

## 3.9. Paving (2025) - Unmitigated

### Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

| Location | TOG | ROG | NOx | CO | SO2 | PM10E | PM10D | PM10T | PM2.5E | PM2.5D | PM2.5T | BCO2 | NBCO2 | CO2T | CH4 | N2O | R | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Onsite | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Daily, Summer (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Off-Road Equipment | 0.85 | 0.71 | 6.52 | 8.84 | 0.01 | 0.29 | — | 0.29 | 0.26 | — | 0.26 | — | 1,351 | 1,351 | 0.05 | 0.01 | — | 1,355 |
| Paving | 0.14 | 0.14 | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Onsite truck | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Daily, Winter (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Average Daily | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |

| | | | | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Off-Road | 0.04 | 0.04 | 0.32 | 0.44 | < 0.005 | 0.01 | — | 0.01 | 0.01 | — | 0.01 | — | 66.6 | 66.6 | < 0.005 | < 0.005 | — | 66.8 |
| Paving | 0.01 | 0.01 | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Onsite truck | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Annual | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Off-Road Equipment | 0.01 | 0.01 | 0.06 | 0.08 | < 0.005 | < 0.005 | — | < 0.005 | < 0.005 | — | < 0.005 | — | 11.0 | 11.0 | < 0.005 | < 0.005 | — | 11.1 |
| Paving | < 0.005 | < 0.005 | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Onsite truck | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Offsite | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Daily, Summer (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Worker | 0.09 | 0.09 | 0.05 | 0.74 | 0.00 | 0.00 | 0.11 | 0.11 | 0.00 | 0.03 | 0.03 | — | 121 | 121 | < 0.005 | 0.01 | 0.45 | 123 |
| Vendor | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Hauling | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Daily, Winter (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Average Daily | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Worker | < 0.005 | < 0.005 | < 0.005 | 0.03 | 0.00 | 0.00 | 0.01 | 0.01 | 0.00 | < 0.005 | < 0.005 | — | 5.50 | 5.50 | < 0.005 | < 0.005 | 0.01 | 5.59 |
| Vendor | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Hauling | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Annual | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Worker | < 0.005 | < 0.005 | < 0.005 | 0.01 | 0.00 | 0.00 | < 0.005 | < 0.005 | 0.00 | < 0.005 | < 0.005 | — | 0.91 | 0.91 | < 0.005 | < 0.005 | < 0.005 | 0.93 |
| Vendor | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Hauling | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

## 3.11. Architectural Coating (2025) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

| Location | TOG | ROG | NOx | CO | SO2 | PM10E | PM10D | PM10T | PM2.5E | PM2.5D | PM2.5T | BCO2 | NBCO2 | CO2T | CH4 | N2O | R | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Onsite | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Daily, Summer (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Off-Road Equipment | 0.15 | 0.13 | 0.88 | 1.14 | < 0.005 | 0.03 | — | 0.03 | 0.03 | — | 0.03 | — | 134 | 134 | 0.01 | < 0.005 | — | 134 |
| Architectural Coatings | 19.5 | 19.5 | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Onsite truck | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Daily, Winter (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Average Daily | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Off-Road Equipment | 0.01 | 0.01 | 0.04 | 0.06 | < 0.005 | < 0.005 | — | < 0.005 | < 0.005 | — | < 0.005 | — | 6.58 | 6.58 | < 0.005 | < 0.005 | — | 6.61 |
| Architectural Coatings | 0.96 | 0.96 | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Onsite truck | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Annual | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |

| | | | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Off-Road Equipment | < 0.005 | < 0.005 | 0.01 | 0.01 | < 0.005 | < 0.005 | — | < 0.005 | < 0.005 | — | < 0.005 | — | 1.09 | 1.09 | < 0.005 | < 0.005 | — | 1.09 |
| Architectural Coatings | 0.18 | 0.18 | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Onsite truck | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Offsite | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Daily, Summer (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Worker | 0.05 | 0.05 | 0.03 | 0.44 | 0.00 | 0.00 | 0.06 | 0.06 | 0.00 | 0.02 | 0.02 | — | 71.6 | 71.6 | < 0.005 | < 0.005 | 0.27 | 72.8 |
| Vendor | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Hauling | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Daily, Winter (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Average Daily | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Worker | < 0.005 | < 0.005 | < 0.005 | 0.02 | 0.00 | 0.00 | < 0.005 | < 0.005 | 0.00 | < 0.005 | < 0.005 | — | 3.25 | 3.25 | < 0.005 | < 0.005 | 0.01 | 3.30 |
| Vendor | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Hauling | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Annual | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Worker | < 0.005 | < 0.005 | < 0.005 | < 0.005 | 0.00 | 0.00 | < 0.005 | < 0.005 | 0.00 | < 0.005 | < 0.005 | — | 0.54 | 0.54 | < 0.005 | < 0.005 | < 0.005 | 0.55 |
| Vendor | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Hauling | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

# 4. Operations Emissions Details

## 4.1. Mobile Emissions by Land Use

### 4.1.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

| Land Use | TOG | ROG | NOx | CO | SO2 | PM10E | PM10D | PM10T | PM2.5E | PM2.5D | PM2.5T | BCO2 | NBCO2 | CO2T | CH4 | N2O | R | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Daily, Summer (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Apartments Mid Rise | 1.84 | 1.74 | 1.34 | 11.1 | 0.02 | 0.02 | 1.91 | 1.93 | 0.02 | 0.48 | 0.50 | — | 2,458 | 2,458 | 0.12 | 0.13 | 9.01 | 2,507 |
| Parking Lot | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Total | 1.84 | 1.74 | 1.34 | 11.1 | 0.02 | 0.02 | 1.91 | 1.93 | 0.02 | 0.48 | 0.50 | — | 2,458 | 2,458 | 0.12 | 0.13 | 9.01 | 2,507 |
| Daily, Winter (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Apartments Mid Rise | 1.64 | 1.52 | 1.53 | 9.95 | 0.02 | 0.02 | 1.91 | 1.93 | 0.02 | 0.48 | 0.50 | — | 2,255 | 2,255 | 0.14 | 0.14 | 0.23 | 2,299 |
| Parking Lot | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Total | 1.64 | 1.52 | 1.53 | 9.95 | 0.02 | 0.02 | 1.91 | 1.93 | 0.02 | 0.48 | 0.50 | — | 2,255 | 2,255 | 0.14 | 0.14 | 0.23 | 2,299 |
| Annual | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Apartments Mid Rise | 0.29 | 0.27 | 0.25 | 1.70 | < 0.005 | < 0.005 | 0.33 | 0.33 | < 0.005 | 0.08 | 0.09 | — | 364 | 364 | 0.02 | 0.02 | 0.61 | 371 |
| Parking Lot | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Total | 0.29 | 0.27 | 0.25 | 1.70 | < 0.005 | < 0.005 | 0.33 | 0.33 | < 0.005 | 0.08 | 0.09 | — | 364 | 364 | 0.02 | 0.02 | 0.61 | 371 |

## 4.2. Energy

## 4.2.1. Electricity Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

| Land Use | TOG | ROG | NOx | CO | SO2 | PM10E | PM10D | PM10T | PM2.5E | PM2.5D | PM2.5T | BCO2 | NBCO2 | CO2T | CH4 | N2O | R | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Daily, Summer (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Apartments Mid Rise | — | — | — | — | — | — | — | — | — | — | — | — | 225 | 225 | 0.04 | < 0.005 | — | 228 |
| Parking Lot | — | — | — | — | — | — | — | — | — | — | — | — | 19.9 | 19.9 | < 0.005 | < 0.005 | — | 20.1 |
| Total | — | — | — | — | — | — | — | — | — | — | — | — | 245 | 245 | 0.04 | < 0.005 | — | 248 |
| Daily, Winter (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Apartments Mid Rise | — | — | — | — | — | — | — | — | — | — | — | — | 225 | 225 | 0.04 | < 0.005 | — | 228 |
| Parking Lot | — | — | — | — | — | — | — | — | — | — | — | — | 19.9 | 19.9 | < 0.005 | < 0.005 | — | 20.1 |
| Total | — | — | — | — | — | — | — | — | — | — | — | — | 245 | 245 | 0.04 | < 0.005 | — | 248 |
| Annual | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Apartments Mid Rise | — | — | — | — | — | — | — | — | — | — | — | — | 37.3 | 37.3 | 0.01 | < 0.005 | — | 37.7 |
| Parking Lot | — | — | — | — | — | — | — | — | — | — | — | — | 3.29 | 3.29 | < 0.005 | < 0.005 | — | 3.32 |
| Total | — | — | — | — | — | — | — | — | — | — | — | — | 40.6 | 40.6 | 0.01 | < 0.005 | — | 41.0 |

## 4.2.3. Natural Gas Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

| Land Use | TOG | ROG | NOx | CO | SO2 | PM10E | PM10D | PM10T | PM2.5E | PM2.5D | PM2.5T | BCO2 | NBCO2 | CO2T | CH4 | N2O | R | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Daily, Summer (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Apartments Mid Rise | 0.06 | 0.03 | 0.52 | 0.22 | < 0.005 | 0.04 | — | 0.04 | 0.04 | — | 0.04 | — | 661 | 661 | 0.06 | < 0.005 | — | 663 |
| Parking Lot | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | — | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 |
| Total | 0.06 | 0.03 | 0.52 | 0.22 | < 0.005 | 0.04 | — | 0.04 | 0.04 | — | 0.04 | — | 661 | 661 | 0.06 | < 0.005 | — | 663 |
| Daily, Winter (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Apartments Mid Rise | 0.06 | 0.03 | 0.52 | 0.22 | < 0.005 | 0.04 | — | 0.04 | 0.04 | — | 0.04 | — | 661 | 661 | 0.06 | < 0.005 | — | 663 |
| Parking Lot | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | — | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 |
| Total | 0.06 | 0.03 | 0.52 | 0.22 | < 0.005 | 0.04 | — | 0.04 | 0.04 | — | 0.04 | — | 661 | 661 | 0.06 | < 0.005 | — | 663 |
| Annual | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Apartments Mid Rise | 0.01 | 0.01 | 0.10 | 0.04 | < 0.005 | 0.01 | — | 0.01 | 0.01 | — | 0.01 | — | 109 | 109 | 0.01 | < 0.005 | — | 110 |
| Parking Lot | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 | 0.00 | — | 0.00 | — | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 |
| Total | 0.01 | 0.01 | 0.10 | 0.04 | < 0.005 | 0.01 | — | 0.01 | 0.01 | — | 0.01 | — | 109 | 109 | 0.01 | < 0.005 | — | 110 |

## 4.3. Area Emissions by Source

### 4.3.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

| Source | TOG | ROG | NOx | CO | SO2 | PM10E | PM10D | PM10T | PM2.5E | PM2.5D | PM2.5T | BCO2 | NBCO2 | CO2T | CH4 | N2O | R | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|

| | | | | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Daily, Summer (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Hearths | 4.20 | 2.08 | 0.98 | 18.8 | 0.06 | 2.70 | — | 2.70 | 2.60 | — | 2.60 | 446 | 863 | 1,309 | 2.10 | < 0.005 | — | 1,362 |
| Consumer Products | 1.17 | 1.17 | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Architectural Coatings | 0.10 | 0.10 | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Landscape Equipment | 0.44 | 0.42 | 0.05 | 4.64 | < 0.005 | < 0.005 | — | < 0.005 | < 0.005 | — | < 0.005 | — | 12.4 | 12.4 | < 0.005 | < 0.005 | — | 12.5 |
| Total | 5.90 | 3.76 | 1.03 | 23.4 | 0.06 | 2.70 | — | 2.70 | 2.60 | — | 2.60 | 446 | 876 | 1,321 | 2.10 | < 0.005 | — | 1,374 |
| Daily, Winter (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Hearths | 4.20 | 2.08 | 0.98 | 18.8 | 0.06 | 2.70 | — | 2.70 | 2.60 | — | 2.60 | 446 | 863 | 1,309 | 2.10 | < 0.005 | — | 1,362 |
| Consumer Products | 1.17 | 1.17 | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Architectural Coatings | 0.10 | 0.10 | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Total | 5.46 | 3.34 | 0.98 | 18.8 | 0.06 | 2.70 | — | 2.70 | 2.60 | — | 2.60 | 446 | 863 | 1,309 | 2.10 | < 0.005 | — | 1,362 |
| Annual | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Hearths | 0.17 | 0.09 | 0.04 | 0.77 | < 0.005 | 0.11 | — | 0.11 | 0.11 | — | 0.11 | 16.6 | 32.1 | 48.7 | 0.08 | < 0.005 | — | 50.7 |
| Consumer Products | 0.21 | 0.21 | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |

| | | | | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Architectural | 0.02 | 0.02 | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Landscape Equipment | 0.04 | 0.04 | < 0.005 | 0.42 | < 0.005 | < 0.005 | — | < 0.005 | < 0.005 | — | < 0.005 | — | 1.02 | 1.02 | < 0.005 | < 0.005 | — | 1.02 |
| Total | 0.44 | 0.35 | 0.04 | 1.19 | < 0.005 | 0.11 | — | 0.11 | 0.11 | — | 0.11 | 16.6 | 33.1 | 49.7 | 0.08 | < 0.005 | — | 51.7 |

## 4.4. Water Emissions by Land Use

### 4.4.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

| Land Use | TOG | ROG | NOx | CO | SO2 | PM10E | PM10D | PM10T | PM2.5E | PM2.5D | PM2.5T | BCO2 | NBCO2 | CO2T | CH4 | N2O | R | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Daily, Summer (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Apartments Mid Rise | — | — | — | — | — | — | — | — | — | — | — | 6.33 | 8.74 | 15.1 | 0.65 | 0.02 | — | 36.0 |
| Parking Lot | — | — | — | — | — | — | — | — | — | — | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 |
| Total | — | — | — | — | — | — | — | — | — | — | — | 6.33 | 8.74 | 15.1 | 0.65 | 0.02 | — | 36.0 |
| Daily, Winter (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Apartments Mid Rise | — | — | — | — | — | — | — | — | — | — | — | 6.33 | 8.74 | 15.1 | 0.65 | 0.02 | — | 36.0 |
| Parking Lot | — | — | — | — | — | — | — | — | — | — | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 |
| Total | — | — | — | — | — | — | — | — | — | — | — | 6.33 | 8.74 | 15.1 | 0.65 | 0.02 | — | 36.0 |
| Annual | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |

| | | | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Apartments | — | — | — | — | — | — | — | — | — | — | — | 1.05 | 1.45 | 2.50 | 0.11 | < 0.005 | — | 5.96 |
| Parking Lot | — | — | — | — | — | — | — | — | — | — | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 |
| Total | — | — | — | — | — | — | — | — | — | — | — | 1.05 | 1.45 | 2.50 | 0.11 | < 0.005 | — | 5.96 |

## 4.5. Waste Emissions by Land Use

### 4.5.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

| Land Use | TOG | ROG | NOx | CO | SO2 | PM10E | PM10D | PM10T | PM2.5E | PM2.5D | PM2.5T | BCO2 | NBCO2 | CO2T | CH4 | N2O | R | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Daily, Summer (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Apartments Mid Rise | — | — | — | — | — | — | — | — | — | — | — | 32.6 | 0.00 | 32.6 | 3.26 | 0.00 | — | 114 |
| Parking Lot | — | — | — | — | — | — | — | — | — | — | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 |
| Total | — | — | — | — | — | — | — | — | — | — | — | 32.6 | 0.00 | 32.6 | 3.26 | 0.00 | — | 114 |
| Daily, Winter (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Apartments Mid Rise | — | — | — | — | — | — | — | — | — | — | — | 32.6 | 0.00 | 32.6 | 3.26 | 0.00 | — | 114 |
| Parking Lot | — | — | — | — | — | — | — | — | — | — | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 |
| Total | — | — | — | — | — | — | — | — | — | — | — | 32.6 | 0.00 | 32.6 | 3.26 | 0.00 | — | 114 |
| Annual | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Apartments Mid Rise | — | — | — | — | — | — | — | — | — | — | — | 5.40 | 0.00 | 5.40 | 0.54 | 0.00 | — | 18.9 |

| | | | | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Parking Lot | — | — | — | — | — | — | — | — | — | — | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 |
| Total | — | — | — | — | — | — | — | — | — | — | — | 5.40 | 0.00 | 5.40 | 0.54 | 0.00 | — | 18.9 |

## 4.6. Refrigerant Emissions by Land Use

### 4.6.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

| Land Use | TOG | ROG | NOx | CO | SO2 | PM10E | PM10D | PM10T | PM2.5E | PM2.5D | PM2.5T | BCO2 | NBCO2 | CO2T | CH4 | N2O | R | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Daily, Summer (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Apartments Mid Rise | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | 0.39 | 0.39 |
| Total | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | 0.39 | 0.39 |
| Daily, Winter (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Apartments Mid Rise | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | 0.39 | 0.39 |
| Total | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | 0.39 | 0.39 |
| Annual | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Apartments Mid Rise | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | 0.06 | 0.06 |
| Total | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | 0.06 | 0.06 |

## 4.7. Offroad Emissions By Equipment Type

### 4.7.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

| Equipment Type | TOG | ROG | NOx | CO | SO2 | PM10E | PM10D | PM10T | PM2.5E | PM2.5D | PM2.5T | BCO2 | NBCO2 | CO2T | CH4 | N2O | R | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Daily, Summer (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Total | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Daily, Winter (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Total | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Annual | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Total | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |

## 4.8. Stationary Emissions By Equipment Type

### 4.8.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

| Equipment Type | TOG | ROG | NOx | CO | SO2 | PM10E | PM10D | PM10T | PM2.5E | PM2.5D | PM2.5T | BCO2 | NBCO2 | CO2T | CH4 | N2O | R | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Daily, Summer (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Total | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Daily, Winter (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Total | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Annual | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Total | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |

## 4.9. User Defined Emissions By Equipment Type

### 4.9.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

| Equipment Type | TOG | ROG | NOx | CO | SO2 | PM10E | PM10D | PM10T | PM2.5E | PM2.5D | PM2.5T | BCO2 | NBCO2 | CO2T | CH4 | N2O | R | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Daily, Summer (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Total | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Daily, Winter (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Total | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Annual | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Total | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |

## 4.10. Soil Carbon Accumulation By Vegetation Type

### 4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

| Vegetation | TOG | ROG | NOx | CO | SO2 | PM10E | PM10D | PM10T | PM2.5E | PM2.5D | PM2.5T | BCO2 | NBCO2 | CO2T | CH4 | N2O | R | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Daily, Summer (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Total | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Daily, Winter (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Total | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |

| | | | | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Annual | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Total | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |

### 4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

| Land Use | TOG | ROG | NOx | CO | SO2 | PM10E | PM10D | PM10T | PM2.5E | PM2.5D | PM2.5T | BCO2 | NBCO2 | CO2T | CH4 | N2O | R | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Daily, Summer (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Total | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Daily, Winter (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Total | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Annual | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Total | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |

### 4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

| Species | TOG | ROG | NOx | CO | SO2 | PM10E | PM10D | PM10T | PM2.5E | PM2.5D | PM2.5T | BCO2 | NBCO2 | CO2T | CH4 | N2O | R | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Daily, Summer (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Avoided | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Subtotal | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Sequestered | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Subtotal | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Removed | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |

| | | | | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Subtotal | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Daily, Winter (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Avoided | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Subtotal | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Sequestered | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Subtotal | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Removed | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Subtotal | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Annual | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Avoided | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Subtotal | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Sequestered | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Subtotal | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Removed | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Subtotal | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |

# 5. Activity Data

## 5.1. Construction Schedule

| Phase Name | Phase Type | Start Date | End Date | Days Per Week | Work Days per Phase | Phase Description |
|---|---|---|---|---|---|---|
| Site Preparation | Site Preparation | 8/30/2024 | 9/6/2024 | 5.00 | 5.00 | — |

| | | | | | | |
|---|---|---|---|---|---|---|
| Grading | Grading | 9/7/2024 | 9/18/2024 | 5.00 | 8.00 | — |
| Building Construction | Building Construction | 9/19/2024 | 8/7/2025 | 5.00 | 230 | — |
| Paving | Paving | 8/8/2025 | 9/2/2025 | 5.00 | 18.0 | — |
| Architectural Coating | Architectural Coating | 9/3/2025 | 9/28/2025 | 5.00 | 18.0 | — |

## 5.2. Off-Road Equipment

### 5.2.1. Unmitigated

| Phase Name | Equipment Type | Fuel Type | Engine Tier | Number per Day | Hours Per Day | Horsepower | Load Factor |
|---|---|---|---|---|---|---|---|
| Site Preparation | Rubber Tired Dozers | Diesel | Average | 3.00 | 8.00 | 367 | 0.40 |
| Site Preparation | Tractors/Loaders/Backhoes | Diesel | Average | 4.00 | 8.00 | 84.0 | 0.37 |
| Grading | Excavators | Diesel | Average | 1.00 | 8.00 | 36.0 | 0.38 |
| Grading | Graders | Diesel | Average | 1.00 | 8.00 | 148 | 0.41 |
| Grading | Rubber Tired Dozers | Diesel | Average | 1.00 | 8.00 | 367 | 0.40 |
| Grading | Tractors/Loaders/Backhoes | Diesel | Average | 3.00 | 8.00 | 84.0 | 0.37 |
| Building Construction | Cranes | Diesel | Average | 1.00 | 7.00 | 367 | 0.29 |
| Building Construction | Forklifts | Diesel | Average | 3.00 | 8.00 | 82.0 | 0.20 |
| Building Construction | Generator Sets | Diesel | Average | 1.00 | 8.00 | 14.0 | 0.74 |
| Building Construction | Tractors/Loaders/Backhoes | Diesel | Average | 3.00 | 7.00 | 84.0 | 0.37 |
| Building Construction | Welders | Diesel | Average | 1.00 | 8.00 | 46.0 | 0.45 |
| Paving | Cement and Mortar Mixers | Diesel | Average | 2.00 | 6.00 | 10.0 | 0.56 |
| Paving | Pavers | Diesel | Average | 1.00 | 8.00 | 81.0 | 0.42 |
| Paving | Paving Equipment | Diesel | Average | 2.00 | 6.00 | 89.0 | 0.36 |
| Paving | Rollers | Diesel | Average | 2.00 | 6.00 | 36.0 | 0.38 |
| Paving | Tractors/Loaders/Backhoes | Diesel | Average | 1.00 | 8.00 | 84.0 | 0.37 |

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| Architectural Coating | Air Compressors | Diesel | Average | 1.00 | 6.00 | 37.0 | 0.48 |

## 5.3. Construction Vehicles

### 5.3.1. Unmitigated

| Phase Name | Trip Type | One-Way Trips per Day | Miles per Trip | Vehicle Mix |
|---|---|---|---|---|
| Site Preparation | — | — | — | — |
| Site Preparation | Worker | 17.5 | 7.70 | LDA,LDT1,LDT2 |
| Site Preparation | Vendor | — | 4.00 | HHDT,MHDT |
| Site Preparation | Hauling | 0.00 | 20.0 | HHDT |
| Site Preparation | Onsite truck | — | — | HHDT |
| Grading | — | — | — | — |
| Grading | Worker | 15.0 | 7.70 | LDA,LDT1,LDT2 |
| Grading | Vendor | — | 4.00 | HHDT,MHDT |
| Grading | Hauling | 0.00 | 20.0 | HHDT |
| Grading | Onsite truck | — | — | HHDT |
| Building Construction | — | — | — | — |
| Building Construction | Worker | 59.0 | 7.70 | LDA,LDT1,LDT2 |
| Building Construction | Vendor | 8.77 | 4.00 | HHDT,MHDT |
| Building Construction | Hauling | 0.00 | 20.0 | HHDT |
| Building Construction | Onsite truck | — | — | HHDT |
| Paving | — | — | — | — |
| Paving | Worker | 20.0 | 7.70 | LDA,LDT1,LDT2 |
| Paving | Vendor | — | 4.00 | HHDT,MHDT |
| Paving | Hauling | 0.00 | 20.0 | HHDT |
| Paving | Onsite truck | — | — | HHDT |
| Architectural Coating | — | — | — | — |
| Architectural Coating | Worker | 11.8 | 7.70 | LDA,LDT1,LDT2 |

| | | | | |
|---|---|---|---|---|
| Architectural Coating | Vendor | — | 4.00 | HHDT,MHDT |
| Architectural Coating | Hauling | 0.00 | 20.0 | HHDT |
| Architectural Coating | Onsite truck | — | — | HHDT |

## 5.4. Vehicles

### 5.4.1. Construction Vehicle Control Strategies

Non-applicable. No control strategies activated by user.

## 5.5. Architectural Coatings

| Phase Name | Residential Interior Area Coated (sq ft) | Residential Exterior Area Coated (sq ft) | Non-Residential Interior Area Coated (sq ft) | Non-Residential Exterior Area Coated (sq ft) | Parking Area Coated (sq ft) |
|---|---|---|---|---|---|
| Architectural Coating | 109,943 | 36,648 | 0.00 | 0.00 | 2,436 |

## 5.6. Dust Mitigation

### 5.6.1. Construction Earthmoving Activities

| Phase Name | Material Imported (cy) | Material Exported (cy) | Acres Graded (acres) | Material Demolished (sq. ft.) | Acres Paved (acres) |
|---|---|---|---|---|---|
| Site Preparation | — | — | 7.50 | 0.00 | — |
| Grading | — | — | 8.00 | 0.00 | — |
| Paving | 0.00 | 0.00 | 0.00 | 0.00 | 0.93 |

### 5.6.2. Construction Earthmoving Control Strategies

Non-applicable. No control strategies activated by user.

## 5.7. Construction Paving

| Land Use | Area Paved (acres) | % Asphalt |
|---|---|---|
| Apartments Mid Rise | — | 0% |
| Parking Lot | 0.93 | 100% |

## 5.8. Construction Electricity Consumption and Emissions Factors

kWh per Year and Emission Factor (lb/MWh)

| Year | kWh per Year | CO2 | CH4 | N2O |
|---|---|---|---|---|
| 2024 | 0.00 | 204 | 0.03 | < 0.005 |
| 2025 | 0.00 | 204 | 0.03 | < 0.005 |

## 5.9. Operational Mobile Sources

### 5.9.1. Unmitigated

| Land Use Type | Trips/Weekday | Trips/Saturday | Trips/Sunday | Trips/Year | VMT/Weekday | VMT/Saturday | VMT/Sunday | VMT/Year |
|---|---|---|---|---|---|---|---|---|
| Apartments Mid Rise | 446 | 403 | 335 | 154,781 | 2,699 | 2,436 | 2,029 | 936,388 |
| Parking Lot | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

## 5.10. Operational Area Sources

### 5.10.1. Hearths

#### 5.10.1.1. Unmitigated

| Hearth Type | Unmitigated (number) |
|---|---|
| Apartments Mid Rise | — |
| Wood Fireplaces | 0 |
| Gas Fireplaces | 41 |
| Propane Fireplaces | 0 |
| Electric Fireplaces | 0 |
| No Fireplaces | 41 |
| Conventional Wood Stoves | 0 |
| Catalytic Wood Stoves | 4 |

| | |
|---|---|
| Non-Catalytic Wood Stoves | 4 |
| Pellet Wood Stoves | 0 |

### 5.10.2. Architectural Coatings

| Residential Interior Area Coated (sq ft) | Residential Exterior Area Coated (sq ft) | Non-Residential Interior Area Coated (sq ft) | Non-Residential Exterior Area Coated (sq ft) | Parking Area Coated (sq ft) |
|---|---|---|---|---|
| 109943.325 | 36,648 | 0.00 | 0.00 | 2,436 |

### 5.10.3. Landscape Equipment

| Season | Unit | Value |
|---|---|---|
| Snow Days | day/yr | 0.00 |
| Summer Days | day/yr | 180 |

## 5.11. Operational Energy Consumption

### 5.11.1. Unmitigated

#### Electricity (kWh/yr) and CO2 and CH4 and N2O and Natural Gas (kBTU/yr)

| Land Use | Electricity (kWh/yr) | CO2 | CH4 | N2O | Natural Gas (kBTU/yr) |
|---|---|---|---|---|---|
| Apartments Mid Rise | 403,341 | 204 | 0.0330 | 0.0040 | 2,062,851 |
| Parking Lot | 35,572 | 204 | 0.0330 | 0.0040 | 0.00 |

## 5.12. Operational Water and Wastewater Consumption

### 5.12.1. Unmitigated

| Land Use | Indoor Water (gal/year) | Outdoor Water (gal/year) |
|---|---|---|
| Apartments Mid Rise | 3,304,272 | 1,087,782 |
| Parking Lot | 0.00 | 0.00 |

## 5.13. Operational Waste Generation

### 5.13.1. Unmitigated

| Land Use | Waste (ton/year) | Cogeneration (kWh/year) |
|---|---|---|
| Apartments Mid Rise | 60.5 | — |
| Parking Lot | 0.00 | — |

## 5.14. Operational Refrigeration and Air Conditioning Equipment

### 5.14.1. Unmitigated

| Land Use Type | Equipment Type | Refrigerant | GWP | Quantity (kg) | Operations Leak Rate | Service Leak Rate | Times Serviced |
|---|---|---|---|---|---|---|---|
| Apartments Mid Rise | Average room A/C & Other residential A/C and heat pumps | R-410A | 2,088 | < 0.005 | 2.50 | 2.50 | 10.0 |
| Apartments Mid Rise | Household refrigerators and/or freezers | R-134a | 1,430 | 0.12 | 0.60 | 0.00 | 1.00 |

## 5.15. Operational Off-Road Equipment

### 5.15.1. Unmitigated

| Equipment Type | Fuel Type | Engine Tier | Number per Day | Hours Per Day | Horsepower | Load Factor |
|---|---|---|---|---|---|---|

## 5.16. Stationary Sources

### 5.16.1. Emergency Generators and Fire Pumps

| Equipment Type | Fuel Type | Number per Day | Hours per Day | Hours per Year | Horsepower | Load Factor |
|---|---|---|---|---|---|---|

### 5.16.2. Process Boilers

| Equipment Type | Fuel Type | Number | Boiler Rating (MMBtu/hr) | Daily Heat Input (MMBtu/day) | Annual Heat Input (MMBtu/yr) |
|---|---|---|---|---|---|

## 5.17. User Defined

| Equipment Type | Fuel Type |
|---|---|

## 5.18. Vegetation

### 5.18.1. Land Use Change

#### 5.18.1.1. Unmitigated

| Vegetation Land Use Type | Vegetation Soil Type | Initial Acres | Final Acres |
|---|---|---|---|

### 5.18.1. Biomass Cover Type

#### 5.18.1.1. Unmitigated

| Biomass Cover Type | Initial Acres | Final Acres |
|---|---|---|

### 5.18.2. Sequestration

#### 5.18.2.1. Unmitigated

| Tree Type | Number | Electricity Saved (kWh/year) | Natural Gas Saved (btu/year) |
|---|---|---|---|

# 6. Climate Risk Detailed Report

## 6.1. Climate Risk Summary

Cal-Adapt midcentury 2040–2059 average projections for four hazards are reported below for your project location. These are under Representation Concentration Pathway (RCP) 8.5 which assumes GHG emissions will continue to rise strongly through 2050 and then plateau around 2100.

| Climate Hazard | Result for Project Location | Unit |
|---|---|---|

| | | |
|---|---|---|
| Temperature and Extreme Heat | 30.9 | annual days of extreme heat |
| Extreme Precipitation | 1.35 | annual days with precipitation above 20 mm |
| Sea Level Rise | — | meters of inundation depth |
| Wildfire | 0.00 | annual hectares burned |

Temperature and Extreme Heat data are for grid cell in which your project are located. The projection is based on the 98th historical percentile of daily maximum/minimum temperatures from observed historical data (32 climate model ensemble from Cal-Adapt, 2040–2059 average under RCP 8.5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Extreme Precipitation data are for the grid cell in which your project are located. The threshold of 20 mm is equivalent to about ¾ an inch of rain, which would be light to moderate rainfall if received over a full day or heavy rain if received over a period of 2 to 4 hours. Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Sea Level Rise data are for the grid cell in which your project are located. The projections are from Radke et al. (2017), as reported in Cal-Adapt (Radke et al., 2017, CEC-500-2017-008), and consider inundation location and depth for the San Francisco Bay, the Sacramento-San Joaquin River Delta and California coast resulting different increments of sea level rise coupled with extreme storm events. Users may select from four scenarios to view the range in potential inundation depth for the grid cell. The four scenarios are: No rise, 0.5 meter, 1.0 meter, 1.41 meters
Wildfire data are for the grid cell in which your project are located. The projections are from UC Davis, as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider historical data of climate, vegetation, population density, and large (> 400 ha) fire history. Users may select from four model simulations to view the range in potential wildfire probabilities for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

## 6.2. Initial Climate Risk Scores

| Climate Hazard | Exposure Score | Sensitivity Score | Adaptive Capacity Score | Vulnerability Score |
|---|---|---|---|---|
| Temperature and Extreme Heat | 4 | 0 | 0 | N/A |
| Extreme Precipitation | N/A | N/A | N/A | N/A |
| Sea Level Rise | N/A | N/A | N/A | N/A |
| Wildfire | N/A | N/A | N/A | N/A |
| Flooding | 0 | 0 | 0 | N/A |
| Drought | 0 | 0 | 0 | N/A |
| Snowpack Reduction | N/A | N/A | N/A | N/A |
| Air Quality Degradation | 0 | 0 | 0 | N/A |

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores do not include implementation of climate risk reduction measures.

## 6.3. Adjusted Climate Risk Scores

| Climate Hazard | Exposure Score | Sensitivity Score | Adaptive Capacity Score | Vulnerability Score |
|---|---|---|---|---|
| Temperature and Extreme Heat | 4 | 1 | 1 | 4 |
| Extreme Precipitation | N/A | N/A | N/A | N/A |
| Sea Level Rise | N/A | N/A | N/A | N/A |
| Wildfire | N/A | N/A | N/A | N/A |
| Flooding | 1 | 1 | 1 | 2 |
| Drought | 1 | 1 | 1 | 2 |
| Snowpack Reduction | N/A | N/A | N/A | N/A |
| Air Quality Degradation | 1 | 1 | 1 | 2 |

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores include implementation of climate risk reduction measures.

### 6.4. Climate Risk Reduction Measures

# 7. Health and Equity Details

## 7.1. CalEnviroScreen 4.0 Scores

The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

| Indicator | Result for Project Census Tract |
|---|---|
| Exposure Indicators | — |
| AQ-Ozone | 82.5 |
| AQ-PM | 94.6 |
| AQ-DPM | 19.6 |
| Drinking Water | 96.0 |
| Lead Risk Housing | 12.2 |
| Pesticides | 75.3 |
| Toxic Releases | 71.9 |

| | |
|---|---|
| Traffic | 53.3 |
| Effect Indicators | — |
| CleanUp Sites | 19.9 |
| Groundwater | 2.11 |
| Haz Waste Facilities/Generators | 35.6 |
| Impaired Water Bodies | 23.9 |
| Solid Waste | 0.00 |
| Sensitive Population | — |
| Asthma | 55.9 |
| Cardio-vascular | 23.1 |
| Low Birth Weights | 25.4 |
| Socioeconomic Factor Indicators | — |
| Education | 7.40 |
| Housing | 23.4 |
| Linguistic | 14.3 |
| Poverty | 6.08 |
| Unemployment | 7.14 |

## 7.2. Healthy Places Index Scores

The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

| Indicator | Result for Project Census Tract |
|---|---|
| Economic | — |
| Above Poverty | 85.05068651 |
| Employed | 83.80597973 |
| Median HI | 87.12947517 |
| Education | — |
| Bachelor's or higher | 84.97369434 |
| High school enrollment | 17.31040678 |

| | |
|---|---|
| Preschool enrollment | 41.72975747 |
| Transportation | — |
| Auto Access | 48.06877967 |
| Active commuting | 7.596561016 |
| Social | — |
| 2-parent households | 29.20569742 |
| Voting | 90.79943539 |
| Neighborhood | — |
| Alcohol availability | 76.44039523 |
| Park access | 18.23431284 |
| Retail density | 29.44950597 |
| Supermarket access | 61.94020275 |
| Tree canopy | 85.16617477 |
| Housing | — |
| Homeownership | 89.86269729 |
| Housing habitability | 81.05992557 |
| Low-inc homeowner severe housing cost burden | 72.02617734 |
| Low-inc renter severe housing cost burden | 31.52829462 |
| Uncrowded housing | 96.93314513 |
| Health Outcomes | — |
| Insured adults | 93.81496215 |
| Arthritis | 2.7 |
| Asthma ER Admissions | 53.8 |
| High Blood Pressure | 3.1 |
| Cancer (excluding skin) | 1.8 |
| Asthma | 76.7 |
| Coronary Heart Disease | 6.2 |
| Chronic Obstructive Pulmonary Disease | 37.6 |

| | |
|---|---|
| Diagnosed Diabetes | 44.3 |
| Life Expectancy at Birth | 20.4 |
| Cognitively Disabled | 25.4 |
| Physically  Disabled | 17.3 |
| Heart Attack ER Admissions | 69.8 |
| Mental Health Not Good | 91.8 |
| Chronic Kidney Disease | 20.1 |
| Obesity | 77.3 |
| Pedestrian Injuries | 19.6 |
| Physical Health Not Good | 71.4 |
| Stroke | 26.0 |
| Health Risk Behaviors | — |
| Binge Drinking | 83.4 |
| Current Smoker | 96.7 |
| No Leisure Time for Physical Activity | 76.1 |
| Climate Change Exposures | — |
| Wildfire Risk | 0.0 |
| SLR Inundation Area | 0.0 |
| Children | 92.2 |
| Elderly | 3.1 |
| English Speaking | 68.5 |
| Foreign-born | 6.6 |
| Outdoor Workers | 80.2 |
| Climate Change Adaptive Capacity | — |
| Impervious Surface Cover | 75.3 |
| Traffic Density | 36.4 |
| Traffic Access | 0.0 |
| Other Indices | — |

| | |
|---|---|
| Hardship | 7.5 |
| Other Decision Support | — |
| 2016 Voting | 84.2 |

## 7.3. Overall Health & Equity Scores

| Metric | Result for Project Census Tract |
|---|---|
| CalEnviroScreen 4.0 Score for Project Location (a) | 23.0 |
| Healthy Places Index Score for Project Location (b) | 75.0 |
| Project Located in a Designated Disadvantaged Community (Senate Bill 535) | No |
| Project Located in a Low-Income Community (Assembly Bill 1550) | No |
| Project Located in a Community Air Protection Program Community (Assembly Bill 617) | No |

a: The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.
b: The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

## 7.4. Health & Equity Measures

No Health & Equity Measures selected.

## 7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

## 7.6. Health & Equity Custom Measures

No Health & Equity Custom Measures created.

# 8. User Changes to Default Data

| Screen | Justification |
|---|---|
| Land Use | From Design Exhibit H |
| Construction: Construction Phases | no demolition required. open field |

Exhibit B

Air Dispersion Model and HRA Spreadsheets

Emissions of DPM During Construction

| Phase | Year | Emissions* | Duration | Total Emissions For Phase | Total Hours | Emissions Per Day Averaged Over Project Duration | Emission Rate Per Hour | Site Wide Hourly Emission Rate | Weighted Site Wide Annual Emission Rate |
|---|---|---|---|---|---|---|---|---|---|
| | | lbs/day | days | lbs | | lbs/day | lbs-hour | lbs-hr/ft2 | |
| Site Preparation | 2024 | 1.6 | 5 | 8 | 40 | 2.87E-02 | 2.00E-01 | 1.24E-06 | 2.23E-08 |
| Grading | 2024 | 0.84 | 8 | 6.72 | 64 | 2.41E-02 | 1.05E-01 | 6.53E-07 | 1.87E-08 |
| Building Construction | 2024 | 0.5 | 68 | 34 | 544 | 1.22E-01 | 6.25E-02 | 3.89E-07 | 9.48E-08 |
| Building Construction | 2025 | 0.43 | 162 | 69.66 | 1296 | 2.50E-01 | 5.38E-02 | 3.35E-07 | 1.94E-07 |
| Paving | 2025 | 0.29 | 18 | 5.22 | 144 | 1.87E-02 | 3.63E-02 | 2.26E-07 | 1.46E-08 |
| Architectural Coating | 2025 | 0.03 | 18 | 0.54 | 144 | 1.94E-03 | 3.75E-03 | 2.33E-08 | 1.51E-09 |
| Total | | | 279 | 123.6 | 2232 | 0.443010753 | | 2.87E-06 | 3.46E-07 |

```
** BREEZE AERMOD
** Trinity Consultants
** VERSION  11.0

CO STARTING
CO TITLEONE  Construction Phase Of 7056 North Prospect Ave Project
CO TITLETWO  DPM Emissions From Off-Road Construction Equipment - Only Weekday Work
CO MODELOPT  DFAULT  CONC  NODRYDPLT  NOWETDPLT
CO RUNORNOT  RUN
CO AVERTIME  ANNUAL
CO POLLUTID  DPM
CO FINISHED

SO STARTING
SO ELEVUNIT  METERS
SO LOCATION  JOO6O1AS  AREAPOLY  245661.2  4080774.5  99.19
** SRCDESCR  7056 Project Site
SO SRCPARAM  JOO6O1AS  3.46E-07  4.3  12  2.15
SO AREAVERT  JOO6O1AS  245661.2 4080774.5  245549.4 4080775.9  245542.8 4080768.7  245546.5 4080731.5
SO AREAVERT  JOO6O1AS  245549.4 4080725.7  245557.7 4080723.1  245557.7 4080705.7  245554.5 4080701.3
SO AREAVERT  JOO6O1AS  245552.6 4080690  245555.9 4080643  245662.6 4080641.2  245661.2 4080774.5
SO EMISFACT  JOO6O1AS  HRDOW  0  0  0  0  0  0  0  1  1  1  1  0  1  1  1  1  0  0  0  0  0  0  0  0  0  0
SO EMISFACT  JOO6O1AS  HRDOW  0  0  0  0  0  0  0  0  0  0  0  0  0  0  0  0  0  0  0  0  0  0  0  0  0  0
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SO SRCGROUP  ALL
SO FINISHED

RE STARTING
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** RCPDESCR  homes to east
RE DISCCART  245764.9  4080671.2  99.06  99.06
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** RCPDESCR  homes to east
RE DISCCART  245689.9  4080696.2  99.06  99.06
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RE DISCCART  245714.9  4080696.2  99.1  99.1
** RCPDESCR  homes to east
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** RCPDESCR  homes to east
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** RCPDESCR  homes to east
RE DISCCART  245789.9  4080696.2  99.23  99.23
** RCPDESCR  homes to east
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** RCPDESCR  homes to east
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** RCPDESCR  homes to east
RE DISCCART  245714.9  4080721.2  99.22  99.22
** RCPDESCR  homes to east
RE DISCCART  245739.9  4080721.2  99.36  99.36
** RCPDESCR  homes to east
RE DISCCART  245764.9  4080721.2  99.36  99.36
** RCPDESCR  homes to east
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** RCPDESCR  homes to east
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RE DISCCART  245710.3  4080822.7  99.36  99.36
** RCPDESCR  Homes to NE
RE DISCCART  245735.3  4080822.7  99.36  99.36
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** RCPDESCR  Homes to NE
RE DISCCART  245685.3  4080847.7  99.22  99.22
** RCPDESCR  Homes to NE
RE DISCCART  245710.3  4080847.7  99.36  99.36
** RCPDESCR  Homes to NE
RE DISCCART  245735.3  4080847.7  99.36  99.36
** RCPDESCR  Homes to NE
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** RCPDESCR  Homes to NE
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** RCPDESCR  Homes to NE
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** RCPDESCR  Homes to NE
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** RCPDESCR  Homes to NE
RE DISCCART  245760.3  4080872.7  99.36  99.36
** RCPDESCR  Homes to NE
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** RCPDESCR  Homes to NE
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** RCPDESCR  Homes to NE
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** RCPDESCR  Homes to NE
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** RCPDESCR  Homes to NE
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** RCPDESCR  Homes to NE
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** RCPDESCR  Homes to NE
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** RCPDESCR  Homes to NE
RE DISCCART  245810.3  4080947.7  99.36  99.36
** RCPDESCR  Homes to NE
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** RCPDESCR  elementary school
RE DISCCART  245349.3  4080786.2  98.45  98.45
** RCPDESCR  elementary school
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** RCPDESCR  elementary school
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** RCPDESCR  elementary school
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** RCPDESCR  elementary school
RE DISCCART  245474.3  4080786.2  98.78  98.78
** RCPDESCR  elementary school
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** RCPDESCR  elementary school
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** RCPDESCR  elementary school
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** RCPDESCR  elementary school
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** RCPDESCR  elementary school
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** RCPDESCR  elementary school
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** RCPDESCR  elementary school
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** RCPDESCR  elementary school
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RE DISCCART  245399.3  4080861.2  98.76  98.76
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** RCPDESCR  elementary school
RE DISCCART  245324.3  4080911.2  98.76  98.76
** RCPDESCR  elementary school
RE DISCCART  245349.3  4080911.2  98.76  98.76
** RCPDESCR  elementary school
RE DISCCART  245374.3  4080911.2  98.76  98.76
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** RCPDESCR  elementary school
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** RCPDESCR  elementary school
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** RCPDESCR  elementary school
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** RCPDESCR  elementary school
RE DISCCART  245324.3  4080936.2  98.76  98.76
** RCPDESCR  elementary school
RE DISCCART  245349.3  4080936.2  98.76  98.76
** RCPDESCR  elementary school
RE DISCCART  245374.3  4080936.2  98.76  98.76
** RCPDESCR  elementary school
RE DISCCART  245399.3  4080936.2  98.76  98.76
** RCPDESCR  elementary school
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** RCPDESCR  elementary school
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** RCPDESCR  elementary school
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** RCPDESCR  Homes to SE
RE DISCCART  245589.6  4080447.7  97.54  97.54
** RCPDESCR  Homes to SE
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** RCPDESCR  Homes to SE
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** RCPDESCR  Homes to SE
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RE DISCCART  245764.6  4080522.7  98.07  98.07
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RE DISCCART  245689.6  4080572.7  98.58  98.58
** RCPDESCR  Homes to SE
RE DISCCART  245714.6  4080572.7  98.58  98.58
** RCPDESCR  Homes to SE
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** RCPDESCR  homes to SW
RE DISCCART  245496.9  4080494.4  97.54  97.54
** RCPDESCR  homes to SW
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** RCPDESCR  homes to SW
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** RCPDESCR  homes to SW
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** RCPDESCR  homes to SW
RE DISCCART  245321.9  4080519.4  97.54  97.54
** RCPDESCR  homes to SW
RE DISCCART  245346.9  4080519.4  97.54  97.54
** RCPDESCR  homes to SW
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** RCPDESCR  homes to SW
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RE DISCCART  245296.9  4080544.4  97.54  97.54
** RCPDESCR  homes to SW
RE DISCCART  245321.9  4080544.4  97.55  97.55
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** RCPDESCR  homes to SW
RE DISCCART  245271.9  4080569.4  97.63  97.63
** RCPDESCR  homes to SW
RE DISCCART  245296.9  4080569.4  97.63  97.63
** RCPDESCR  homes to SW
RE DISCCART  245321.9  4080569.4  97.66  97.66
** RCPDESCR  homes to SW
RE DISCCART  245346.9  4080569.4  97.83  97.83
** RCPDESCR  homes to SW
RE DISCCART  245371.9  4080569.4  97.84  97.84
** RCPDESCR  homes to SW
RE DISCCART  245396.9  4080569.4  97.9  97.9
** RCPDESCR  homes to SW
RE DISCCART  245421.9  4080569.4  97.94  97.94
** RCPDESCR  homes to SW
RE DISCCART  245446.9  4080569.4  97.94  97.94
** RCPDESCR  homes to SW
RE DISCCART  245471.9  4080569.4  97.95  97.95
** RCPDESCR  homes to SW
RE DISCCART  245496.9  4080569.4  98.03  98.03
** RCPDESCR  homes to SW
RE DISCCART  245521.9  4080569.4  98.28  98.28
** RCPDESCR  homes to SW
RE FINISHED

ME STARTING
ME SURFFILE  "C:\USERS\JCLAR\ONEDRIVE\CLARKA~1\PRDA05~1\FRESNO_18-22.SFC"
** SURFFILE  "C:\USERS\JCLAR\ONEDRIVE\CLARKA~1\PRDA05~1\FRESNO_18-22.SFC"
ME PROFFILE  "C:\USERS\JCLAR\ONEDRIVE\CLARKA~1\PRDA05~1\FRESNO_18-22.PFL"
** PROFFILE  "C:\USERS\JCLAR\ONEDRIVE\CLARKA~1\PRDA05~1\FRESNO_18-22.PFL"
ME SURFDATA  93193 2018
ME UAIRDATA  23230 2018
ME PROFBASE  10  METERS
ME FINISHED

OU STARTING
OU FILEFORM  FIX
OU PLOTFILE  ANNUAL  ALL  ALL`ANNUAL.plt  10000
OU POSTFILE  ANNUAL  ALL  UNFORM  ALL`ANNUAL.bin  10001
OU FINISHED


  *** Message Summary For AERMOD Model Setup ***

  --------- Summary of Total Messages --------

 A Total of            0 Fatal Error Message(s)
 A Total of            4 Warning Message(s)
 A Total of            0 Informational Message(s)
```

```
   ******** FATAL ERROR MESSAGES ********
              ***  NONE  ***


   ********   WARNING MESSAGES   ********
 ME W186     606       MEOPEN: THRESH_1MIN 1-min ASOS wind speed threshold used          0.50
 ME W187     606       MEOPEN: ADJ_U* Option for Stable Low Winds used in AERMET
 OU W565     610       PERPLT: Possible Conflict With Dynamically Allocated FUNIT     PLOTFILE
 OU W565     611       PERPST: Possible Conflict With Dynamically Allocated FUNIT     POSTFILE

 ************************************
 *** SETUP Finishes Successfully ***
 ************************************

 *** AERMOD - VERSION 22112  ***   ***  Construction Phase Of 7056 North Prospect Ave Project              ***
     07/17/24
 *** AERMET - VERSION  21112 ***   ***  DPM Emissions From Off-Road Construction Equipment - Only Weekday W ***
   16:49:31

   PAGE   1
 *** MODELOPTs:    RegDFAULT  CONC  ELEV  NODRYDPLT  NOWETDPLT  RURAL  ADJ_U*

                                          ***     MODEL SETUP OPTIONS SUMMARY       ***
 - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - -
 - - - - - -

 ** Model Options Selected:
      * Model Uses Regulatory DEFAULT Options
      * Model Is Setup For Calculation of Average CONCentration Values.
      * NO GAS DEPOSITION Data Provided.
      * NO PARTICLE DEPOSITION Data Provided.
      * Model Uses NO DRY DEPLETION. DDPLETE  =  F
      * Model Uses NO WET DEPLETION. WETDPLT  =  F
      * Stack-tip Downwash.
      * Model Accounts for ELEVated Terrain Effects.
      * Use Calms Processing Routine.
      * Use Missing Data Processing Routine.
      * No Exponential Decay.
      * Model Uses RURAL Dispersion Only.
      * ADJ_U*   - Use ADJ_U* option for SBL in AERMET
      * CCVR_Sub - Meteorological data includes CCVR substitutions
      * TEMP_Sub - Meteorological data includes TEMP substitutions
      * Model Assumes No FLAGPOLE Receptor Heights.
      * The User Specified a Pollutant Type of: DPM

 **Model Calculates ANNUAL Averages Only

 **This Run Includes:      1 Source(s);       1 Source Group(s); and     283 Receptor(s)

                with:      0 POINT(s), including
                           0 POINTCAP(s) and      0 POINTHOR(s)
                 and:      0 VOLUME source(s)
                 and:      1 AREA type source(s)
                 and:      0 LINE source(s)
                 and:      0 RLINE/RLINEXT source(s)
                 and:      0 OPENPIT source(s)
                 and:      0 BUOYANT LINE source(s) with a total of     0 line(s)
                 and:      0 SWPOINT source(s)


 **Model Set To Continue RUNning After the Setup Testing.

 **The AERMET Input Meteorological Data Version Date:  21112

 **Output Options Selected:
         Model Outputs Tables of ANNUAL Averages by Receptor
         Model Outputs External File(s) of Concurrent Values for Postprocessing (POSTFILE Keyword)
```

Model Outputs External File(s) of High Values for Plotting (PLOTFILE Keyword)

**NOTE: The Following Flags May Appear Following CONC Values: c for Calm Hours
m for Missing Hours
b for Both Calm and Missing Hours

**Misc. Inputs: Base Elev. for Pot. Temp. Profile (m MSL) = 10.00 ; Decay Coef. = 0.000 ; Rot. Angle = 0.0
Emission Units = GRAMS/SEC ; Emission Rate Unit Factor = 0.10000E+07
Output Units = MICROGRAMS/M**3

**Approximate Storage Requirements of Model = 3.5 MB of RAM.

**Input Runstream File: aermod.inp

**Output Print File: aermod.out


*** MODELOPTs: RegDFAULT CONC ELEV NODRYDPLT NOWETDPLT RURAL ADJ_U*

*** AREAPOLY SOURCE DATA ***

| SOURCE ID | NUMBER PART. CATS. | EMISSION RATE (GRAMS/SEC /METER**2) | LOCATION OF AREA X (METERS) | Y (METERS) | BASE ELEV. (METERS) | RELEASE HEIGHT (METERS) | NUMBER OF VERTS. | INIT. SZ (METERS) | URBAN SOURCE | EMISSION RATE SCALAR VARY BY |
|---|---|---|---|---|---|---|---|---|---|---|
| JOO6O1AS | 0 | 0.34600E-06 | 245661.2 | 4080774.5 | 99.2 | 4.30 | 12 | 2.15 | NO | HRDOW |


*** MODELOPTs: RegDFAULT CONC ELEV NODRYDPLT NOWETDPLT RURAL ADJ_U*

*** SOURCE IDs DEFINING SOURCE GROUPS ***

| SRCGROUP ID | SOURCE IDs |
|---|---|
| ALL | JOO6O1AS , |


*** MODELOPTs: RegDFAULT CONC ELEV NODRYDPLT NOWETDPLT RURAL ADJ_U*

* SOURCE EMISSION RATE SCALARS WHICH VARY DIURNALLY AND BY DAY OF WEEK (HRDOW) *

SOURCE ID = JOO6O1AS ; SOURCE TYPE = AREAPOLY :

| HOUR | SCALAR | HOUR | SCALAR | HOUR | SCALAR | HOUR | SCALAR | HOUR | SCALAR | HOUR | SCALAR | HOUR | SCALAR |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|

DAY OF WEEK = WEEKDAY

```
    1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6  .0000E+00    7  .0000E+00
8  .1000E+01
    9  .1000E+01   10  .1000E+01   11  .1000E+01   12  .0000E+00   13  .1000E+01   14  .1000E+01   15  .1000E+01
16  .1000E+01
   17  .0000E+00   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22  .0000E+00   23  .0000E+00
24  .0000E+00
                                        DAY OF WEEK = SATURDAY
    1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6  .0000E+00    7  .0000E+00
8  .0000E+00
    9  .0000E+00   10  .0000E+00   11  .0000E+00   12  .0000E+00   13  .0000E+00   14  .0000E+00   15  .0000E+00
16  .0000E+00
   17  .0000E+00   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22  .0000E+00   23  .0000E+00
24  .0000E+00
                                        DAY OF WEEK = SUNDAY
    1  .0000E+00    2  .0000E+00    3  .0000E+00    4  .0000E+00    5  .0000E+00    6  .0000E+00    7  .0000E+00
8  .0000E+00
    9  .0000E+00   10  .0000E+00   11  .0000E+00   12  .0000E+00   13  .0000E+00   14  .0000E+00   15  .0000E+00
16  .0000E+00
   17  .0000E+00   18  .0000E+00   19  .0000E+00   20  .0000E+00   21  .0000E+00   22  .0000E+00   23  .0000E+00
24  .0000E+00
*** AERMOD - VERSION 22112  ***   ***  Construction Phase Of 7056 North Prospect Ave Project               ***
 07/17/24
*** AERMET - VERSION  21112 ***   ***  DPM Emissions From Off-Road Construction Equipment - Only Weekday W ***
 16:49:31

 PAGE   5
*** MODELOPTs:    RegDFAULT  CONC  ELEV  NODRYDPLT  NOWETDPLT  RURAL  ADJ_U*

                                  *** DISCRETE CARTESIAN RECEPTORS ***
                                 (X-COORD, Y-COORD, ZELEV, ZHILL, ZFLAG)
                                             (METERS)

    ( 245689.9, 4080671.2,      99.1,      99.1,      0.0);        ( 245714.9, 4080671.2,      99.1,      99.1,
    0.0);
    ( 245739.9, 4080671.2,      99.1,      99.1,      0.0);        ( 245764.9, 4080671.2,      99.1,      99.1,
    0.0);
    ( 245789.9, 4080671.2,      99.1,      99.1,      0.0);        ( 245814.9, 4080671.2,      99.1,      99.1,
    0.0);
    ( 245839.9, 4080671.2,      99.1,      99.1,      0.0);        ( 245864.9, 4080671.2,      99.3,      99.3,
    0.0);
    ( 245689.9, 4080696.2,      99.1,      99.1,      0.0);        ( 245714.9, 4080696.2,      99.1,      99.1,
    0.0);
    ( 245739.9, 4080696.2,      99.2,      99.2,      0.0);        ( 245764.9, 4080696.2,      99.2,      99.2,
    0.0);
    ( 245789.9, 4080696.2,      99.2,      99.2,      0.0);        ( 245814.9, 4080696.2,      99.2,      99.2,
    0.0);
    ( 245839.9, 4080696.2,      99.3,      99.3,      0.0);        ( 245864.9, 4080696.2,      99.4,      99.4,
    0.0);
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    0.0);
    ( 245739.9, 4080721.2,      99.4,      99.4,      0.0);        ( 245764.9, 4080721.2,      99.4,      99.4,
    0.0);
    ( 245789.9, 4080721.2,      99.4,      99.4,      0.0);        ( 245814.9, 4080721.2,      99.4,      99.4,
    0.0);
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    0.0);
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    0.0);
    ( 245789.9, 4080746.2,      99.4,      99.4,      0.0);        ( 245814.9, 4080746.2,      99.4,      99.4,
    0.0);
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    0.0);
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    0.0);
    ( 245739.9, 4080771.2,      99.4,      99.4,      0.0);        ( 245764.9, 4080771.2,      99.4,      99.4,
    0.0);
    ( 245789.9, 4080771.2,      99.4,      99.4,      0.0);        ( 245814.9, 4080771.2,      99.4,      99.4,
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( 245735.3, 4080822.7, 99.4, 99.4, 0.0); ( 245685.3, 4080847.7, 99.2, 99.2,
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( 245710.3, 4080847.7, 99.4, 99.4, 0.0); ( 245735.3, 4080847.7, 99.4, 99.4,
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( 245710.3, 4080897.7, 99.4, 99.4, 0.0); ( 245735.3, 4080897.7, 99.4, 99.4,
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( 245760.3, 4080897.7, 99.4, 99.4, 0.0); ( 245785.3, 4080897.7, 99.4, 99.4,
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( 245810.3, 4080897.7, 99.4, 99.4, 0.0); ( 245835.3, 4080897.7, 99.4, 99.4,
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( 245860.3, 4080897.7, 99.7, 99.7, 0.0); ( 245685.3, 4080922.7, 99.1, 99.1,
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( 245810.3, 4080947.7, 99.4, 99.4, 0.0); ( 245835.3, 4080947.7, 99.4, 99.4,
0.0);


*** MODELOPTs: RegDFAULT CONC ELEV NODRYDPLT NOWETDPLT RURAL ADJ_U*

*** DISCRETE CARTESIAN RECEPTORS ***
(X-COORD, Y-COORD, ZELEV, ZHILL, ZFLAG)
(METERS)

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0.0);
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( 245474.3, 4080786.2,      98.8,      98.8,      0.0);      ( 245499.3, 4080786.2,      98.9,      98.9,
0.0);
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( 245424.3, 4080861.2,      98.8,      98.8,      0.0);      ( 245449.3, 4080861.2,      98.8,      98.8,
0.0);
( 245474.3, 4080861.2,      98.8,      98.8,      0.0);      ( 245499.3, 4080861.2,      98.8,      98.8,
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( 245349.3, 4080886.2,      98.7,      98.7,      0.0);      ( 245374.3, 4080886.2,      98.8,      98.8,
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0.0);
( 245449.3, 4080886.2,      98.8,      98.8,      0.0);      ( 245474.3, 4080886.2,      98.8,      98.8,
0.0);
( 245499.3, 4080886.2,      98.8,      98.8,      0.0);      ( 245299.3, 4080911.2,      98.8,      98.8,
0.0);
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0.0);
( 245449.3, 4080936.2,      98.8,      98.8,      0.0);      ( 245474.3, 4080936.2,      98.8,      98.8,
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( 245499.3, 4080936.2,      98.8,      98.8,      0.0);      ( 245499.3, 4080961.2,      98.8,      98.8,
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( 245564.6, 4080447.7,      97.5,      97.5,      0.0);      ( 245589.6, 4080447.7,      97.5,      97.5,
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( 245614.6, 4080447.7,      97.5,      97.5,      0.0);      ( 245639.6, 4080447.7,      97.5,      97.5,
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( 245664.6, 4080447.7,      97.5,      97.5,      0.0);      ( 245689.6, 4080447.7,      97.5,      97.5,
0.0);
( 245714.6, 4080447.7,      97.5,      97.5,      0.0);      ( 245739.6, 4080447.7,      97.5,      97.5,
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( 245664.6, 4080472.7, 97.5, 97.5, 0.0); ( 245689.6, 4080472.7, 97.6, 97.6,
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( 245714.6, 4080472.7, 97.6, 97.6, 0.0); ( 245739.6, 4080472.7, 97.6, 97.6,
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( 245614.6, 4080497.7, 97.5, 97.5, 0.0); ( 245639.6, 4080497.7, 97.5, 97.5,
0.0);
( 245664.6, 4080497.7, 97.7, 97.7, 0.0); ( 245689.6, 4080497.7, 97.8, 97.8,
0.0);

*** MODELOPTs: RegDFAULT CONC ELEV NODRYDPLT NOWETDPLT RURAL ADJ_U*

*** DISCRETE CARTESIAN RECEPTORS ***
(X-COORD, Y-COORD, ZELEV, ZHILL, ZFLAG)
(METERS)

( 245714.6, 4080497.7, 97.8, 97.8, 0.0); ( 245739.6, 4080497.7, 97.8, 97.8,
0.0);
( 245764.6, 4080497.7, 97.8, 97.8, 0.0); ( 245789.6, 4080497.7, 97.8, 97.8,
0.0);
( 245564.6, 4080522.7, 97.8, 97.8, 0.0); ( 245589.6, 4080522.7, 97.8, 97.8,
0.0);
( 245614.6, 4080522.7, 97.8, 97.8, 0.0); ( 245639.6, 4080522.7, 97.9, 97.9,
0.0);
( 245664.6, 4080522.7, 98.0, 98.0, 0.0); ( 245689.6, 4080522.7, 98.1, 98.1,
0.0);
( 245714.6, 4080522.7, 98.1, 98.1, 0.0); ( 245739.6, 4080522.7, 98.1, 98.1,
0.0);
( 245764.6, 4080522.7, 98.1, 98.1, 0.0); ( 245789.6, 4080522.7, 98.1, 98.1,
0.0);
( 245564.6, 4080547.7, 98.0, 98.0, 0.0); ( 245589.6, 4080547.7, 98.0, 98.0,
0.0);
( 245614.6, 4080547.7, 98.0, 98.0, 0.0); ( 245639.6, 4080547.7, 98.2, 98.2,
0.0);
( 245664.6, 4080547.7, 98.3, 98.3, 0.0); ( 245689.6, 4080547.7, 98.3, 98.3,
0.0);
( 245714.6, 4080547.7, 98.3, 98.3, 0.0); ( 245739.6, 4080547.7, 98.3, 98.3,
0.0);
( 245764.6, 4080547.7, 98.3, 98.3, 0.0); ( 245789.6, 4080547.7, 98.5, 98.5,
0.0);
( 245564.6, 4080572.7, 98.4, 98.4, 0.0); ( 245589.6, 4080572.7, 98.4, 98.4,
0.0);
( 245614.6, 4080572.7, 98.4, 98.4, 0.0); ( 245639.6, 4080572.7, 98.5, 98.5,
0.0);
( 245664.6, 4080572.7, 98.6, 98.6, 0.0); ( 245689.6, 4080572.7, 98.6, 98.6,
0.0);
( 245714.6, 4080572.7, 98.6, 98.6, 0.0); ( 245739.6, 4080572.7, 98.6, 98.6,
0.0);
( 245764.6, 4080572.7, 98.6, 98.6, 0.0); ( 245789.6, 4080572.7, 98.7, 98.7,
0.0);
( 245221.9, 4080419.4, 97.2, 97.2, 0.0); ( 245246.9, 4080419.4, 97.2, 97.2,
0.0);
( 245271.9, 4080419.4, 97.2, 97.2, 0.0); ( 245221.9, 4080444.4, 97.2, 97.2,
0.0);
( 245246.9, 4080444.4, 97.2, 97.2, 0.0); ( 245271.9, 4080444.4, 97.2, 97.2,
0.0);

( 245296.9, 4080444.4, 97.2, 97.2, 0.0); ( 245321.9, 4080444.4, 97.3, 97.3, 0.0);
( 245221.9, 4080469.4, 97.2, 97.2, 0.0); ( 245246.9, 4080469.4, 97.2, 97.2, 0.0);
( 245271.9, 4080469.4, 97.2, 97.2, 0.0); ( 245296.9, 4080469.4, 97.3, 97.3, 0.0);
( 245321.9, 4080469.4, 97.5, 97.5, 0.0); ( 245346.9, 4080469.4, 97.5, 97.5, 0.0);
( 245371.9, 4080469.4, 97.5, 97.5, 0.0); ( 245396.9, 4080469.4, 97.5, 97.5, 0.0);
( 245421.9, 4080469.4, 97.5, 97.5, 0.0); ( 245221.9, 4080494.4, 97.5, 97.5, 0.0);
( 245246.9, 4080494.4, 97.5, 97.5, 0.0); ( 245271.9, 4080494.4, 97.5, 97.5, 0.0);
( 245296.9, 4080494.4, 97.5, 97.5, 0.0); ( 245321.9, 4080494.4, 97.5, 97.5, 0.0);
( 245346.9, 4080494.4, 97.5, 97.5, 0.0); ( 245371.9, 4080494.4, 97.7, 97.7, 0.0);
( 245396.9, 4080494.4, 97.8, 97.8, 0.0); ( 245421.9, 4080494.4, 97.7, 97.7, 0.0);
( 245446.9, 4080494.4, 97.5, 97.5, 0.0); ( 245471.9, 4080494.4, 97.5, 97.5, 0.0);
( 245496.9, 4080494.4, 97.5, 97.5, 0.0); ( 245521.9, 4080494.4, 97.5, 97.5, 0.0);
( 245221.9, 4080519.4, 97.5, 97.5, 0.0); ( 245246.9, 4080519.4, 97.5, 97.5, 0.0);
( 245271.9, 4080519.4, 97.5, 97.5, 0.0); ( 245296.9, 4080519.4, 97.5, 97.5, 0.0);
( 245321.9, 4080519.4, 97.5, 97.5, 0.0); ( 245346.9, 4080519.4, 97.5, 97.5, 0.0);
( 245371.9, 4080519.4, 97.8, 97.8, 0.0); ( 245396.9, 4080519.4, 97.8, 97.8, 0.0);
( 245421.9, 4080519.4, 97.8, 97.8, 0.0); ( 245446.9, 4080519.4, 97.7, 97.7, 0.0);
( 245471.9, 4080519.4, 97.5, 97.5, 0.0); ( 245496.9, 4080519.4, 97.5, 97.5, 0.0);
( 245521.9, 4080519.4, 97.7, 97.7, 0.0); ( 245221.9, 4080544.4, 97.5, 97.5, 0.0);
( 245246.9, 4080544.4, 97.5, 97.5, 0.0); ( 245271.9, 4080544.4, 97.5, 97.5, 0.0);
( 245296.9, 4080544.4, 97.5, 97.5, 0.0); ( 245321.9, 4080544.4, 97.5, 97.5, 0.0);
( 245346.9, 4080544.4, 97.7, 97.7, 0.0); ( 245371.9, 4080544.4, 97.8, 97.8, 0.0);
( 245396.9, 4080544.4, 97.8, 97.8, 0.0); ( 245421.9, 4080544.4, 97.8, 97.8, 0.0);
( 245446.9, 4080544.4, 97.8, 97.8, 0.0); ( 245471.9, 4080544.4, 97.7, 97.7, 0.0);
( 245496.9, 4080544.4, 97.7, 97.7, 0.0); ( 245521.9, 4080544.4, 97.9, 97.9, 0.0);


*** MODELOPTs: RegDFAULT CONC ELEV NODRYDPLT NOWETDPLT RURAL ADJ_U*

*** DISCRETE CARTESIAN RECEPTORS ***
(X-COORD, Y-COORD, ZELEV, ZHILL, ZFLAG)
(METERS)

( 245221.9, 4080569.4, 97.6, 97.6, 0.0); ( 245246.9, 4080569.4, 97.6, 97.6, 0.0);
( 245271.9, 4080569.4, 97.6, 97.6, 0.0); ( 245296.9, 4080569.4, 97.6, 97.6, 0.0);
( 245321.9, 4080569.4, 97.7, 97.7, 0.0); ( 245346.9, 4080569.4, 97.8, 97.8, 0.0);
( 245371.9, 4080569.4, 97.8, 97.8, 0.0); ( 245396.9, 4080569.4, 97.9, 97.9,

```
    0.0);
    ( 245421.9, 4080569.4,      97.9,      97.9,       0.0);        ( 245446.9, 4080569.4,      97.9,      97.9,
    0.0);
    ( 245471.9, 4080569.4,      98.0,      98.0,       0.0);        ( 245496.9, 4080569.4,      98.0,      98.0,
    0.0);
    ( 245521.9, 4080569.4,      98.3,      98.3,       0.0);

 *** AERMOD - VERSION 22112  ***   ***  Construction Phase Of 7056 North Prospect Ave Project               ***
    07/17/24
 *** AERMET - VERSION  21112 ***   ***  DPM Emissions From Off-Road Construction Equipment - Only Weekday W ***
   16:49:31

   PAGE   9
 *** MODELOPTs:    RegDFAULT  CONC  ELEV  NODRYDPLT  NOWETDPLT  RURAL  ADJ_U*

                                      *** METEOROLOGICAL DAYS SELECTED FOR PROCESSING ***
                                                (1=YES; 0=NO)

          1 1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1
1 1
          1 1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1
1 1
          1 1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1
1 1
          1 1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1
1 1
          1 1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1
1 1
          1 1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1
1 1
          1 1 1 1 1 1 1 1 1 1 1  1 1 1 1 1

              NOTE:  METEOROLOGICAL DATA ACTUALLY PROCESSED WILL ALSO DEPEND ON WHAT IS INCLUDED IN THE DATA
FILE.


                                  *** UPPER BOUND OF FIRST THROUGH FIFTH WIND SPEED CATEGORIES ***
                                                (METERS/SEC)

                                                1.54,   3.09,   5.14,   8.23,  10.80,
 *** AERMOD - VERSION 22112  ***   ***  Construction Phase Of 7056 North Prospect Ave Project               ***
    07/17/24
 *** AERMET - VERSION  21112 ***   ***  DPM Emissions From Off-Road Construction Equipment - Only Weekday W ***
   16:49:31

   PAGE  10
 *** MODELOPTs:    RegDFAULT  CONC  ELEV  NODRYDPLT  NOWETDPLT  RURAL  ADJ_U*

                                    *** UP TO THE FIRST 24 HOURS OF METEOROLOGICAL DATA ***

   Surface file:   C:\USERS\JCLAR\ONEDRIVE\CLARKA~1\PRDA05~1\FRESNO_18-22.SFC                          Met Version:
21112
   Profile file:   C:\USERS\JCLAR\ONEDRIVE\CLARKA~1\PRDA05~1\FRESNO_18-22.PFL
   Surface format: FREE

   Profile format: FREE

   Surface station no.:    93193                  Upper air station no.:    23230
                 Name: UNKNOWN                                    Name: UNKNOWN
                 Year:   2018                                     Year:   2018

 First 24 hours of scalar data
 YR MO DY JDY HR     H0     U*     W*  DT/DZ ZICNV ZIMCH  M-O LEN    Z0  BOWEN ALBEDO  REF WS   WD     HT  REF TA
  HT
- - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - -
- - -
```

```
18 01 01   1 01   -6.0  0.108 -9.000 -9.000 -999.   85.     18.7  0.17   1.06   1.00    1.20  347.   10.0  280.9
2.0
18 01 01   1 02   -2.0  0.062 -9.000 -9.000 -999.   38.     10.9  0.02   1.06   1.00    0.91  174.   10.0  279.2
2.0
18 01 01   1 03   -3.4  0.076 -9.000 -9.000 -999.   50.     11.8  0.03   1.06   1.00    1.20  265.   10.0  279.2
2.0
18 01 01   1 04   -5.1  0.095 -9.000 -9.000 -999.   71.     15.2  0.06   1.06   1.00    1.35  316.   10.0  278.1
2.0
18 01 01   1 05   -8.8  0.123 -9.000 -9.000 -999.  104.     19.1  0.04   1.06   1.00    1.87   96.   10.0  277.0
2.0
18 01 01   1 06   -2.6  0.067 -9.000 -9.000 -999.   43.     10.7  0.02   1.06   1.00    1.08  177.   10.0  277.5
2.0
18 01 01   1 07   -3.7  0.078 -9.000 -9.000 -999.   52.     11.5  0.02   1.06   1.00    1.33  181.   10.0  277.5
2.0
18 01 01   1 08  -15.2  0.167 -9.000 -9.000 -999.  164.     30.7  0.06   1.06   0.65    2.32   76.   10.0  276.4
2.0
18 01 01   1 09   -3.5  0.149 -9.000 -9.000 -999.  139.     86.8  0.04   1.06   0.36    2.15  109.   10.0  278.1
2.0
18 01 01   1 10   56.2  0.204  0.651  0.006  177.  221.    -13.6  0.04   1.06   0.26    2.37  134.   10.0  281.4
2.0
18 01 01   1 11   92.0  0.233  1.067  0.016  477.  270.    -12.4  0.04   1.06   0.22    2.62  105.   10.0  283.1
2.0
18 01 01   1 12  116.8  0.202  1.234  0.018  581.  219.     -6.4  0.04   1.06   0.21    2.11  102.   10.0  285.9
2.0
18 01 01   1 13  112.5  0.144  1.280  0.019  673.  132.     -2.4  0.02   1.06   0.21    1.55  183.   10.0  287.5
2.0
18 01 01   1 14   84.0  0.122  1.190  0.019  723.  103.     -2.0  0.02   1.06   0.22    1.28  200.   10.0  289.2
2.0
18 01 01   1 15   57.9  0.161  1.059  0.019  738.  155.     -6.5  0.03   1.06   0.26    1.81  262.   10.0  290.4
2.0
18 01 01   1 16   16.8  0.124  0.702  0.019  742.  105.    -10.3  0.03   1.06   0.35    1.47  259.   10.0  289.9
2.0
18 01 01   1 17   -2.5  0.068 -9.000 -9.000 -999.   44.     11.3  0.02   1.06   0.62    1.14  297.   10.0  287.5
2.0
18 01 01   1 18   -7.4  0.111 -9.000 -9.000 -999.   89.     16.9  0.03   1.06   1.00    1.84  239.   10.0  286.4
2.0
18 01 01   1 19   -4.0  0.085 -9.000 -9.000 -999.   60.     13.8  0.06   1.06   1.00    1.21   83.   10.0  284.9
2.0
18 01 01   1 20  -10.4  0.137 -9.000 -9.000 -999.  122.     22.3  0.06   1.06   1.00    1.93   76.   10.0  283.8
2.0
18 01 01   1 21   -4.7  0.090 -9.000 -9.000 -999.   65.     14.0  0.04   1.06   1.00    1.38  109.   10.0  283.1
2.0
18 01 01   1 22   -4.1  0.084 -9.000 -9.000 -999.   58.     13.0  0.04   1.06   1.00    1.30  127.   10.0  281.4
2.0
18 01 01   1 23  -11.7  0.145 -9.000 -9.000 -999.  133.     23.6  0.06   1.06   1.00    2.04   70.   10.0  280.9
2.0
18 01 01   1 24   -3.4  0.079 -9.000 -9.000 -999.   54.     13.0  0.06   1.06   1.00    1.09   80.   10.0  281.4
2.0


First hour of profile data
YR MO DY HR HEIGHT F  WDIR    WSPD AMB_TMP sigmaA  sigmaW  sigmaV
18 01 01 01   10.0 1  347.    1.20   281.0   99.0  -99.00  -99.00

F indicates top of profile (=1) or below (=0)
 *** AERMOD - VERSION 22112  ***   ***  Construction Phase Of 7056 North Prospect Ave Project                ***
    07/17/24
*** AERMET - VERSION  21112 ***   ***  DPM Emissions From Off-Road Construction Equipment - Only Weekday W ***
  16:49:31

  PAGE  11
*** MODELOPTs:    RegDFAULT  CONC  ELEV  NODRYDPLT  NOWETDPLT  RURAL  ADJ_U*

                  *** THE ANNUAL AVERAGE CONCENTRATION    VALUES AVERAGED OVER   5 YEARS FOR SOURCE GROUP: ALL
***
                                INCLUDING SOURCE(S):     JOO6O1AS    ,

                                          *** DISCRETE CARTESIAN RECEPTOR POINTS ***
```

** CONC OF DPM IN MICROGRAMS/M**3 **

| X-COORD (M) | Y-COORD (M) | CONC | X-COORD (M) | Y-COORD (M) | CONC |
|---|---|---|---|---|---|
| 245689.90 | 4080671.20 | 0.11757 | 245714.90 | 4080671.20 | 0.07252 |
| 245739.90 | 4080671.20 | 0.04710 | 245764.90 | 4080671.20 | 0.03210 |
| 245789.90 | 4080671.20 | 0.02278 | 245814.90 | 4080671.20 | 0.01672 |
| 245839.90 | 4080671.20 | 0.01264 | 245864.90 | 4080671.20 | 0.00980 |
| 245689.90 | 4080696.20 | 0.11503 | 245714.90 | 4080696.20 | 0.06783 |
| 245739.90 | 4080696.20 | 0.04241 | 245764.90 | 4080696.20 | 0.02819 |
| 245789.90 | 4080696.20 | 0.01974 | 245814.90 | 4080696.20 | 0.01443 |
| 245839.90 | 4080696.20 | 0.01092 | 245864.90 | 4080696.20 | 0.00851 |
| 245689.90 | 4080721.20 | 0.10227 | 245714.90 | 4080721.20 | 0.05707 |
| 245739.90 | 4080721.20 | 0.03465 | 245764.90 | 4080721.20 | 0.02286 |
| 245789.90 | 4080721.20 | 0.01609 | 245814.90 | 4080721.20 | 0.01190 |
| 245839.90 | 4080721.20 | 0.00914 | 245864.90 | 4080721.20 | 0.00723 |
| 245689.90 | 4080746.20 | 0.07687 | 245714.90 | 4080746.20 | 0.04157 |
| 245739.90 | 4080746.20 | 0.02564 | 245764.90 | 4080746.20 | 0.01740 |
| 245789.90 | 4080746.20 | 0.01261 | 245814.90 | 4080746.20 | 0.00958 |
| 245839.90 | 4080746.20 | 0.00753 | 245864.90 | 4080746.20 | 0.00608 |
| 245689.90 | 4080771.20 | 0.04405 | 245714.90 | 4080771.20 | 0.02676 |
| 245739.90 | 4080771.20 | 0.01796 | 245764.90 | 4080771.20 | 0.01294 |
| 245789.90 | 4080771.20 | 0.00979 | 245814.90 | 4080771.20 | 0.00768 |
| 245839.90 | 4080771.20 | 0.00619 | 245864.90 | 4080771.20 | 0.00510 |
| 245764.90 | 4080796.20 | 0.00971 | 245789.90 | 4080796.20 | 0.00765 |
| 245814.90 | 4080796.20 | 0.00619 | 245839.90 | 4080796.20 | 0.00510 |
| 245864.90 | 4080796.20 | 0.00428 | 245789.90 | 4080821.20 | 0.00606 |
| 245814.90 | 4080821.20 | 0.00502 | 245839.90 | 4080821.20 | 0.00422 |
| 245864.90 | 4080821.20 | 0.00360 | 245814.90 | 4080846.20 | 0.00415 |
| 245839.90 | 4080846.20 | 0.00354 | 245864.90 | 4080846.20 | 0.00305 |
| 245685.30 | 4080822.70 | 0.01741 | 245710.30 | 4080822.70 | 0.01269 |
| 245735.30 | 4080822.70 | 0.00968 | 245685.30 | 4080847.70 | 0.01232 |
| 245710.30 | 4080847.70 | 0.00943 | 245735.30 | 4080847.70 | 0.00746 |
| 245760.30 | 4080847.70 | 0.00607 | 245685.30 | 4080872.70 | 0.00921 |
| 245710.30 | 4080872.70 | 0.00731 | 245735.30 | 4080872.70 | 0.00594 |
| 245760.30 | 4080872.70 | 0.00494 | 245785.30 | 4080872.70 | 0.00417 |

| | | | | | |
|---|---|---|---|---|---|
| 245810.30 | 4080872.70 | 0.00357 | 245835.30 | 4080872.70 | 0.00308 |
| 245860.30 | 4080872.70 | 0.00268 | 245685.30 | 4080897.70 | 0.00717 |
| 245710.30 | 4080897.70 | 0.00583 | 245735.30 | 4080897.70 | 0.00484 |
| 245760.30 | 4080897.70 | 0.00409 | 245785.30 | 4080897.70 | 0.00351 |
| 245810.30 | 4080897.70 | 0.00305 | 245835.30 | 4080897.70 | 0.00267 |
| 245860.30 | 4080897.70 | 0.00235 | 245685.30 | 4080922.70 | 0.00576 |
| 245710.30 | 4080922.70 | 0.00477 | 245735.30 | 4080922.70 | 0.00402 |
| 245760.30 | 4080922.70 | 0.00344 | 245785.30 | 4080922.70 | 0.00299 |



*** MODELOPTs: RegDFAULT CONC ELEV NODRYDPLT NOWETDPLT RURAL ADJ_U*

*** THE ANNUAL AVERAGE CONCENTRATION VALUES AVERAGED OVER 5 YEARS FOR SOURCE GROUP: ALL ***

INCLUDING SOURCE(S): JOO6O1AS ,

*** DISCRETE CARTESIAN RECEPTOR POINTS ***

** CONC OF DPM IN MICROGRAMS/M**3 **

| X-COORD (M) | Y-COORD (M) | CONC | X-COORD (M) | Y-COORD (M) | CONC |
|---|---|---|---|---|---|
| 245810.30 | 4080922.70 | 0.00263 | 245835.30 | 4080922.70 | 0.00233 |
| 245860.30 | 4080922.70 | 0.00208 | 245685.30 | 4080947.70 | 0.00474 |
| 245710.30 | 4080947.70 | 0.00398 | 245735.30 | 4080947.70 | 0.00339 |
| 245760.30 | 4080947.70 | 0.00293 | 245785.30 | 4080947.70 | 0.00257 |
| 245810.30 | 4080947.70 | 0.00228 | 245835.30 | 4080947.70 | 0.00204 |
| 245860.30 | 4080947.70 | 0.00184 | 245835.30 | 4080972.70 | 0.00179 |
| 245860.30 | 4080972.70 | 0.00163 | 245299.30 | 4080786.20 | 0.00772 |
| 245324.30 | 4080786.20 | 0.00922 | 245349.30 | 4080786.20 | 0.01120 |
| 245374.30 | 4080786.20 | 0.01386 | 245399.30 | 4080786.20 | 0.01749 |
| 245424.30 | 4080786.20 | 0.02261 | 245449.30 | 4080786.20 | 0.02998 |
| 245474.30 | 4080786.20 | 0.04103 | 245499.30 | 4080786.20 | 0.05904 |
| 245299.30 | 4080811.20 | 0.00811 | 245324.30 | 4080811.20 | 0.00967 |
| 245349.30 | 4080811.20 | 0.01168 | 245374.30 | 4080811.20 | 0.01431 |
| 245399.30 | 4080811.20 | 0.01778 | 245424.30 | 4080811.20 | 0.02242 |
| 245449.30 | 4080811.20 | 0.02867 | 245474.30 | 4080811.20 | 0.03715 |
| 245499.30 | 4080811.20 | 0.04842 | 245299.30 | 4080836.20 | 0.00838 |
| 245324.30 | 4080836.20 | 0.00991 | 245349.30 | 4080836.20 | 0.01183 |

| | | | | | |
|---|---|---|---|---|---|
| 245374.30 | 4080836.20 | 0.01424 | 245399.30 | 4080836.20 | 0.01725 |
| 245424.30 | 4080836.20 | 0.02095 | 245449.30 | 4080836.20 | 0.02541 |
| 245474.30 | 4080836.20 | 0.03056 | 245499.30 | 4080836.20 | 0.03603 |
| 245324.30 | 4080861.20 | 0.00990 | 245349.30 | 4080861.20 | 0.01159 |
| 245374.30 | 4080861.20 | 0.01361 | 245399.30 | 4080861.20 | 0.01590 |
| 245424.30 | 4080861.20 | 0.01845 | 245449.30 | 4080861.20 | 0.02114 |
| 245474.30 | 4080861.20 | 0.02382 | 245499.30 | 4080861.20 | 0.02621 |
| 245299.30 | 4080886.20 | 0.00839 | 245324.30 | 4080886.20 | 0.00960 |
| 245349.30 | 4080886.20 | 0.01097 | 245374.30 | 4080886.20 | 0.01245 |
| 245399.30 | 4080886.20 | 0.01399 | 245424.30 | 4080886.20 | 0.01552 |
| 245449.30 | 4080886.20 | 0.01698 | 245474.30 | 4080886.20 | 0.01828 |
| 245499.30 | 4080886.20 | 0.01926 | 245299.30 | 4080911.20 | 0.00805 |
| 245324.30 | 4080911.20 | 0.00901 | 245349.30 | 4080911.20 | 0.00999 |
| 245374.30 | 4080911.20 | 0.01097 | 245399.30 | 4080911.20 | 0.01189 |
| 245424.30 | 4080911.20 | 0.01274 | 245449.30 | 4080911.20 | 0.01350 |
| 245474.30 | 4080911.20 | 0.01412 | 245499.30 | 4080911.20 | 0.01449 |
| 245299.30 | 4080936.20 | 0.00751 | 245324.30 | 4080936.20 | 0.00819 |
| 245349.30 | 4080936.20 | 0.00883 | 245374.30 | 4080936.20 | 0.00941 |
| 245399.30 | 4080936.20 | 0.00993 | 245424.30 | 4080936.20 | 0.01038 |
| 245449.30 | 4080936.20 | 0.01078 | 245474.30 | 4080936.20 | 0.01108 |
| 245499.30 | 4080936.20 | 0.01120 | 245499.30 | 4080961.20 | 0.00888 |
| 245564.60 | 4080447.70 | 0.00232 | 245589.60 | 4080447.70 | 0.00261 |
| 245614.60 | 4080447.70 | 0.00296 | 245639.60 | 4080447.70 | 0.00340 |



*** MODELOPTs: RegDFAULT CONC ELEV NODRYDPLT NOWETDPLT RURAL ADJ_U*

*** THE ANNUAL AVERAGE CONCENTRATION VALUES AVERAGED OVER 5 YEARS FOR SOURCE GROUP: ALL ***

INCLUDING SOURCE(S): JOO6O1AS ,

*** DISCRETE CARTESIAN RECEPTOR POINTS ***

** CONC OF DPM IN MICROGRAMS/M**3 **

| X-COORD (M) | Y-COORD (M) | CONC | X-COORD (M) | Y-COORD (M) | CONC |
|---|---|---|---|---|---|
| 245664.60 | 4080447.70 | 0.00397 | 245689.60 | 4080447.70 | 0.00466 |
| 245714.60 | 4080447.70 | 0.00543 | 245739.60 | 4080447.70 | 0.00619 |

| | | | | | |
|---|---|---|---|---|---|
| 245564.60 | 4080472.70 | 0.00283 | 245589.60 | 4080472.70 | 0.00324 |
| 245614.60 | 4080472.70 | 0.00377 | 245639.60 | 4080472.70 | 0.00445 |
| 245664.60 | 4080472.70 | 0.00531 | 245689.60 | 4080472.70 | 0.00632 |
| 245714.60 | 4080472.70 | 0.00737 | 245739.60 | 4080472.70 | 0.00830 |
| 245764.60 | 4080472.70 | 0.00897 | 245789.60 | 4080472.70 | 0.00928 |
| 245564.60 | 4080497.70 | 0.00355 | 245589.60 | 4080497.70 | 0.00416 |
| 245614.60 | 4080497.70 | 0.00498 | 245639.60 | 4080497.70 | 0.00607 |
| 245664.60 | 4080497.70 | 0.00742 | 245689.60 | 4080497.70 | 0.00890 |
| 245714.60 | 4080497.70 | 0.01027 | 245739.60 | 4080497.70 | 0.01130 |
| 245764.60 | 4080497.70 | 0.01180 | 245789.60 | 4080497.70 | 0.01175 |
| 245564.60 | 4080522.70 | 0.00461 | 245589.60 | 4080522.70 | 0.00556 |
| 245614.60 | 4080522.70 | 0.00694 | 245639.60 | 4080522.70 | 0.00877 |
| 245664.60 | 4080522.70 | 0.01091 | 245689.60 | 4080522.70 | 0.01302 |
| 245714.60 | 4080522.70 | 0.01467 | 245739.60 | 4080522.70 | 0.01551 |
| 245764.60 | 4080522.70 | 0.01546 | 245789.60 | 4080522.70 | 0.01470 |
| 245564.60 | 4080547.70 | 0.00629 | 245589.60 | 4080547.70 | 0.00789 |
| 245614.60 | 4080547.70 | 0.01038 | 245639.60 | 4080547.70 | 0.01362 |
| 245664.60 | 4080547.70 | 0.01701 | 245689.60 | 4080547.70 | 0.01981 |
| 245714.60 | 4080547.70 | 0.02133 | 245739.60 | 4080547.70 | 0.02129 |
| 245764.60 | 4080547.70 | 0.01998 | 245789.60 | 4080547.70 | 0.01799 |
| 245564.60 | 4080572.70 | 0.00922 | 245589.60 | 4080572.70 | 0.01231 |
| 245614.60 | 4080572.70 | 0.01726 | 245639.60 | 4080572.70 | 0.02311 |
| 245664.60 | 4080572.70 | 0.02822 | 245689.60 | 4080572.70 | 0.03127 |
| 245714.60 | 4080572.70 | 0.03128 | 245739.60 | 4080572.70 | 0.02876 |
| 245764.60 | 4080572.70 | 0.02507 | 245789.60 | 4080572.70 | 0.02124 |
| 245221.90 | 4080419.40 | 0.00129 | 245246.90 | 4080419.40 | 0.00131 |
| 245271.90 | 4080419.40 | 0.00132 | 245221.90 | 4080444.40 | 0.00147 |
| 245246.90 | 4080444.40 | 0.00150 | 245271.90 | 4080444.40 | 0.00153 |
| 245296.90 | 4080444.40 | 0.00156 | 245321.90 | 4080444.40 | 0.00157 |
| 245221.90 | 4080469.40 | 0.00167 | 245246.90 | 4080469.40 | 0.00173 |
| 245271.90 | 4080469.40 | 0.00178 | 245296.90 | 4080469.40 | 0.00182 |
| 245321.90 | 4080469.40 | 0.00187 | 245346.90 | 4080469.40 | 0.00190 |
| 245371.90 | 4080469.40 | 0.00191 | 245396.90 | 4080469.40 | 0.00192 |
| 245421.90 | 4080469.40 | 0.00193 | 245221.90 | 4080494.40 | 0.00190 |
| 245246.90 | 4080494.40 | 0.00198 | 245271.90 | 4080494.40 | 0.00206 |

| | | | | | |
|---|---|---|---|---|---|
| 245296.90 | 4080494.40 | 0.00214 | 245321.90 | 4080494.40 | 0.00221 |
| 245346.90 | 4080494.40 | 0.00228 | 245371.90 | 4080494.40 | 0.00233 |
| 245396.90 | 4080494.40 | 0.00237 | 245421.90 | 4080494.40 | 0.00240 |



*** MODELOPTs: RegDFAULT CONC ELEV NODRYDPLT NOWETDPLT RURAL ADJ_U*

*** THE ANNUAL AVERAGE CONCENTRATION VALUES AVERAGED OVER 5 YEARS FOR SOURCE GROUP: ALL ***

INCLUDING SOURCE(S): JOO6O1AS ,

*** DISCRETE CARTESIAN RECEPTOR POINTS ***

** CONC OF DPM IN MICROGRAMS/M**3 **

| X-COORD (M) | Y-COORD (M) | CONC | X-COORD (M) | Y-COORD (M) | CONC |
|---|---|---|---|---|---|
| 245446.90 | 4080494.40 | 0.00242 | 245471.90 | 4080494.40 | 0.00247 |
| 245496.90 | 4080494.40 | 0.00258 | 245521.90 | 4080494.40 | 0.00279 |
| 245221.90 | 4080519.40 | 0.00213 | 245246.90 | 4080519.40 | 0.00225 |
| 245271.90 | 4080519.40 | 0.00237 | 245296.90 | 4080519.40 | 0.00250 |
| 245321.90 | 4080519.40 | 0.00262 | 245346.90 | 4080519.40 | 0.00274 |
| 245371.90 | 4080519.40 | 0.00285 | 245396.90 | 4080519.40 | 0.00295 |
| 245421.90 | 4080519.40 | 0.00302 | 245446.90 | 4080519.40 | 0.00308 |
| 245471.90 | 4080519.40 | 0.00315 | 245496.90 | 4080519.40 | 0.00328 |
| 245521.90 | 4080519.40 | 0.00355 | 245221.90 | 4080544.40 | 0.00237 |
| 245246.90 | 4080544.40 | 0.00253 | 245271.90 | 4080544.40 | 0.00271 |
| 245296.90 | 4080544.40 | 0.00289 | 245321.90 | 4080544.40 | 0.00308 |
| 245346.90 | 4080544.40 | 0.00328 | 245371.90 | 4080544.40 | 0.00349 |
| 245396.90 | 4080544.40 | 0.00368 | 245421.90 | 4080544.40 | 0.00385 |
| 245446.90 | 4080544.40 | 0.00401 | 245471.90 | 4080544.40 | 0.00415 |
| 245496.90 | 4080544.40 | 0.00434 | 245521.90 | 4080544.40 | 0.00470 |
| 245221.90 | 4080569.40 | 0.00261 | 245246.90 | 4080569.40 | 0.00283 |
| 245271.90 | 4080569.40 | 0.00306 | 245296.90 | 4080569.40 | 0.00332 |
| 245321.90 | 4080569.40 | 0.00360 | 245346.90 | 4080569.40 | 0.00391 |
| 245371.90 | 4080569.40 | 0.00424 | 245396.90 | 4080569.40 | 0.00458 |
| 245421.90 | 4080569.40 | 0.00493 | 245446.90 | 4080569.40 | 0.00528 |
| 245471.90 | 4080569.40 | 0.00563 | 245496.90 | 4080569.40 | 0.00601 |
| 245521.90 | 4080569.40 | 0.00657 | | | |

*** MODELOPTs: RegDFAULT CONC ELEV NODRYDPLT NOWETDPLT RURAL ADJ_U*

*** THE SUMMARY OF MAXIMUM ANNUAL RESULTS AVERAGED OVER 5 YEARS ***

** CONC OF DPM IN MICROGRAMS/M**3 **

| NETWORK GROUP ID | | AVERAGE CONC | RECEPTOR (XR, YR, ZELEV, ZHILL, ZFLAG) | | | | | OF TYPE GRID-ID |
|---|---|---|---|---|---|---|---|---|
| ALL | 1ST HIGHEST VALUE IS | 0.11757 AT | 245689.90, | 4080671.20, | 99.06, | 99.06, | 0.00) | DC |
| | 2ND HIGHEST VALUE IS | 0.11503 AT | 245689.90, | 4080696.20, | 99.06, | 99.06, | 0.00) | DC |
| | 3RD HIGHEST VALUE IS | 0.10227 AT | 245689.90, | 4080721.20, | 99.11, | 99.11, | 0.00) | DC |
| | 4TH HIGHEST VALUE IS | 0.07687 AT | 245689.90, | 4080746.20, | 99.22, | 99.22, | 0.00) | DC |
| | 5TH HIGHEST VALUE IS | 0.07252 AT | 245714.90, | 4080671.20, | 99.06, | 99.06, | 0.00) | DC |
| | 6TH HIGHEST VALUE IS | 0.06783 AT | 245714.90, | 4080696.20, | 99.10, | 99.10, | 0.00) | DC |
| | 7TH HIGHEST VALUE IS | 0.05904 AT | 245499.30, | 4080786.20, | 98.90, | 98.90, | 0.00) | DC |
| | 8TH HIGHEST VALUE IS | 0.05707 AT | 245714.90, | 4080721.20, | 99.22, | 99.22, | 0.00) | DC |
| | 9TH HIGHEST VALUE IS | 0.04842 AT | 245499.30, | 4080811.20, | 98.77, | 98.77, | 0.00) | DC |
| | 10TH HIGHEST VALUE IS | 0.04710 AT | 245739.90, | 4080671.20, | 99.06, | 99.06, | 0.00) | DC |

*** RECEPTOR TYPES: GC = GRIDCART
GP = GRIDPOLR
DC = DISCCART
DP = DISCPOLR


*** MODELOPTs: RegDFAULT CONC ELEV NODRYDPLT NOWETDPLT RURAL ADJ_U*

*** Message Summary : AERMOD Model Execution ***

--------- Summary of Total Messages --------

A Total of 0 Fatal Error Message(s)
A Total of 6 Warning Message(s)
A Total of 1361 Informational Message(s)

A Total of 43824 Hours Were Processed

A Total of 750 Calm Hours Identified

A Total of 611 Missing Hours Identified ( 1.39 Percent)

```
 ******** FATAL ERROR MESSAGES ********
            ***  NONE  ***


 ********   WARNING MESSAGES   ********
ME W186     606       MEOPEN: THRESH_1MIN 1-min ASOS wind speed threshold used          0.50
ME W187     606       MEOPEN: ADJ_U* Option for Stable Low Winds used in AERMET
OU W565     610       PERPLT: Possible Conflict With Dynamically Allocated FUNIT     PLOTFILE
OU W565     611       PERPST: Possible Conflict With Dynamically Allocated FUNIT     POSTFILE
MX W420    7582        METQA: Wind Speed Out-of-Range.   KURDAT =                   18111222
MX W420    7588        METQA: Wind Speed Out-of-Range.   KURDAT =                   18111304

 ************************************
 *** AERMOD Finishes Successfully ***
 ************************************
```

**Risk Calculations For Diesel Exhaust**

$Risk_{inh-res} = Dose_{air} * CPF * ASF * ED/AT$

$Dose_{air} = C_{air} * (BR/BW) * A * EF * 10^{-6}$

| Variable | Description | Units | Value |
|---|---|---|---|
| $Risk_{inh-air}$ | Residential inhalation cancer risk | Unitless | Calculated |
| $Dose_{air}$ | Daily inhalation dose | mg/kg-day | Calculated |
| CPF | Inhalation cancer potency factor | $(mg/kg\text{-}day)^{-1}$ | Chemical Specific |
| ASF | Age sensitivity factor for a specified age group | Unitless | Calculated |
| ED | Exposure duration (in years) for a specified age group | years | Calculated |
| AT | Averaging time for lifetime caner risk | years | 70 |
| FAH | Fraction of time spent at home | Unitless | Calculated |

| Variable | Description | Units | Value |
|---|---|---|---|
| $Dose_{air}$ | Daily inhalation dose | mg/kg-day | Calculated |
| $C_{air}$ | Concentration in air | $ug/m^3$ | **0.121** |
| (BR/BW) | Daily Breathing rate normalized to body weight | L/kg body weight-day | Calculated |
| A | Inhalation absorption fraction | Unitless | 1 |
| EF | Exposure frequency (days/365 days) | Unitless | Calculated |
| $10^{-6}$ | migrograms to milligrams conversion, liters to cubic meters conversion | Unitless | Calculated |

0.00E+00

1.21E-01

**Residential Exposures**

| Age Group | Risk | Age Sensitivity | FAH | ED | CPF | Dose Air | Cair | BR/BW | A | EF |
|---|---|---|---|---|---|---|---|---|---|---|
| 3rd Trimester | 0.00E+00 | 10 | 1 | 0 | 1.1 | 4.19E-05 | 0.121 | 361 | 1 | 0.958904 |
| 0-1 | 2.05E-05 | 10 | 1 | 1.03 | 1.1 | 1.26E-04 | 0.121 | 1090 | 1 | 0.958904 |
| 1-2 | 0.00E+00 | 10 | 1 | 0 | 1.1 | 1.26E-04 | 0.121 | 1090 | 1 | 0.958904 |
| 2-3 | 0.00E+00 | 3 | 1 | 0 | 1.1 | 6.64E-05 | 0.121 | 572 | 1 | 0.958904 |
| 3-4 | 0.00E+00 | 3 | 1 | 0 | 1.1 | 6.64E-05 | 0.121 | 572 | 1 | 0.958904 |
| 2<9 | 0.00E+00 | 3 | 0.72 | 0 | 1.1 | 9.99E-05 | 0.121 | 861 | 1 | 0.958904 |
| 2<16 | 0.00E+00 | 3 | 0.72 | 0 | 1.1 | 8.64E-05 | 0.121 | 745 | 1 | 0.958904 |
| 16<30 | 4.59E-07 | 1 | 0.73 | 1.03 | 1.1 | 3.89E-05 | 0.121 | 335 | 1 | 0.958904 |
| 16-70 | 0.00E+00 | 1 | 0.73 | 0 | 1.1 | 3.36E-05 | 0.121 | 290 | 1 | 0.958904 |

| | |
|---|---|
| 3rd trimeseter to 4. | 2.05E-05 |
| 3rd trimester to 30 | 0.00E+00 |
| 3rd trimester to 70 | **2.09E-05** |

**Risk Calculations For Diesel Exhaust**

$Risk_{inh-res} = Dose_{air} * CPF * ASF * ED/AT$

$Dose_{air} = C_{air} * (BR/BW) * A * EF * 10^{-6}$

| Variable | Description | Units | Value |
|---|---|---|---|
| $Risk_{inh-air}$ | Residential inhalation cancer risk | Unitless | Calculated |
| $Dose_{air}$ | Daily inhalation dose | mg/kg-day | Calculated |
| CPF | Inhalation cancer potency factor | $(mg/kg\text{-}day)^{-1}$ | Chemical Specific |
| ASF | Age sensitivity factor for a specified age group | Unitless | Calculated |
| ED | Exposure duration (in years) for a specified age group | years | Calculated |
| AT | Averaging time for lifetime caner risk | years | 70 |
| FAH | Fraction of time spent at home | Unitless | Calculated |

| Variable | Description | Units | Value |
|---|---|---|---|
| $Dose_{air}$ | Daily inhalation dose | mg/kg-day | Calculated |
| $C_{air}$ | Concentration in air | $ug/m^3$ | **0.127** 1.27E-01 |
| (BR/BW) | Daily Breathing rate normalized to body weight | L/kg body weight-day | Calculated |
| A | Inhalation absorption fraction | Unitless | 1 |
| EF | Exposure frequency (days/365 days) | Unitless | Calculated |
| $10^{-6}$ | migrograms to milligrams conversion, liters to cubic meters conversion | Unitless | Calculated |

0.00E+00

**Residential Exposures**

| Age Group | Risk | Age Sensitivity | FAH | ED | CPF | Dose Air | Cair | BR/BW | A | EF |
|---|---|---|---|---|---|---|---|---|---|---|
| 3rd Trimester | 0.00E+00 | 10 | 1 | 0 | 1.1 | 4.40E-05 | 0.127 | 361 | 1 | 0.958904 |
| 0-1 | 2.15E-05 | 10 | 1 | 1.03 | 1.1 | 1.33E-04 | 0.127 | 1090 | 1 | 0.958904 |
| 1-2 | 0.00E+00 | 10 | 1 | 0 | 1.1 | 1.33E-04 | 0.127 | 1090 | 1 | 0.958904 |
| 2-3 | 0.00E+00 | 3 | 1 | 0 | 1.1 | 6.97E-05 | 0.127 | 572 | 1 | 0.958904 |
| 3-4 | 0.00E+00 | 3 | 1 | 0 | 1.1 | 6.97E-05 | 0.127 | 572 | 1 | 0.958904 |
| 2<9 | 0.00E+00 | 3 | 0.72 | 0 | 1.1 | 1.05E-04 | 0.127 | 861 | 1 | 0.958904 |
| 2<16 | 0.00E+00 | 3 | 0.72 | 0 | 1.1 | 9.07E-05 | 0.127 | 745 | 1 | 0.958904 |
| 16<30 | 4.82E-07 | 1 | 0.73 | 1.03 | 1.1 | 4.08E-05 | 0.127 | 335 | 1 | 0.958904 |
| 16-70 | 0.00E+00 | 1 | 0.73 | 0 | 1.1 | 3.53E-05 | 0.127 | 290 | 1 | 0.958904 |

| | |
|---|---|
| 3rd trimeseter to 4. | 2.15E-05 |
| 3rd trimester to 30 | 0.00E+00 |
| 3rd trimester to 70 | **2.20E-05** |

# EXHIBIT B

WILSON IHRIG
ACOUSTICS, NOISE & VIBRATION

CALIFORNIA
WASHINGTON
NEW YORK

23 July 2024

Christopher A. Brown, Director
Fennemore Law
8080 N. Palm Avenue, Third Floor
Fresno, California 93711

Subject: *Lincoln Park Apartments, 7056 North Prospect Avenue, Fresno, California*
City of Fresno Permit Application P21-00989
Review of Categorical Exemption Environmental Assessment – Noise

Dear Mr. Brown:

I have reviewed documents pertaining to the Categorical Exemption of the subject project, in particular the document identified as Exhibit J on the City of Fresno's Legislation website page that pertains to this project:[1]

> *City of Fresno Categorical Exemption*
> *Environmental Assessment for Development Permit Application No. P21-00989*
> *("Environmental Assessment")*

This letter presents our comments on Noise section of this document.

Wilson Ihrig, Acoustical Consultants, has practiced exclusively in the field of acoustics since 1966. During our 58 years of operation, we have prepared hundreds of noise studies for Environmental Impact Reports and Statements. We have one of the largest technical laboratories in the acoustical consulting industry. We also regularly utilize industry-standard acoustical programs such as Environmental Noise Model (ENM), Traffic Noise Model (TNM), SoundPLAN, and CADNA. In short, we are well qualified to prepare environmental noise studies and review studies prepared by others.

## Comments Regarding Construction Noise

The Environmental Assessment takes the position that because the Fresno municipal code exempts construction noise during specified time periods from the quantitative noise standards that otherwise apply, construction noise from the project will technically comply with the local

[1] City of Fresno - File #: ID 24-651 (legistar.com)

standards and, therefore, is incapable of causing any sort of environmental impact. The fallacy of this argument is plain when one considers that it would allow noise levels that could cause hearing loss and still lead to the conclusion that those levels do not cause a significant environmental noise impact. CEQA is not focused on the application of local regulations. Rather, it is focused on the determination of actual environmental degradation and disclosure of any degradation that is reasonably found to cause a significant impact on the environment. While the CEQA Appendix G guidelines for noise assessment do call for comparison of project noise levels to local standards, they also call for comparison to the existing ambient, specifically stating:

> Would the project result in . . . [g]eneration of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project . . .

This aspect of a thorough CEQA noise assessment is completely disregarded in the Environmental Assessment document.

An assessment based on the existing ambient is all the more important in this situation because the Fresno noise ordinance's *prima facia* noise limit is itself based on the ambient noise level:

> Any noise or sound exceeding the ambient noise level at the property line of any person offended thereby, or, if a condominium or apartment house, within any adjoining living unit, by more than five decibels shall be deemed to be prima facie evidence of a violation of Section 8-305. [F.M.C. Sec. 10-106. PRIMA FACIE VIOLATION]

In this situation, comparison with the existing ambient must necessarily be the basis for a CEQA assessment.

There is nothing in the record for this project that suggests that ambient measurements have been made in the surrounding neighborhoods. However, the Fresno Noise Ordinance contains statutory minimum ambient noise levels for various zoning districts, and given a lack of any other information, it is reasonable to assume these for the areas surrounding the project site. For residential districts, these statutory ambient levels are:

| | |
|---|---|
| 7:00 am to 7:00 pm | 60 dBA |
| 7:00 pm to 10:00 pm | 55 dBA |

Construction is a noisy endeavor. The Environmental Protection Agency (EPA) has published typical ranges of noise levels at construction sites for a variety of building types.[2] For domestic housing, the EPA noise levels for each major phase of construction with all pertinent equipment present at site are reproduced in Table I.

[2] *Noise from Construction Equipment and Operations, Building Equipment, and Home Appliances*, U. S. Environmental Protection Agency, NTID300.1, 31 December 1971.

**TABLE I EPA NOISE LEVELS FOR RESIDENTIAL CONSTRUCTION**

| Phase | Average | Range‡ |
|---|---|---|
| Ground clearing | 83 dBA | 75 to 91 dBA |
| Excavation | 88 | 80 to 96 |
| Foundations | 81 | 71 to 91 |
| Erection | 81 | 71 to 91 |
| Finishing | 88 | 81 to 95 |

‡ The range is the average plus/minus one standard deviation. For a "normal" (bell-shaped) distribution, the noise level will be within the range 68% of the time and higher than the low end of the range 84% of the time.

The values given in Table I are based on the loudest piece of equipment being located at a distance of 50 feet. Construction equipment noise spreads as a point source (as opposed to roadway noise which is a line source), and point source noise attenuates at a rate of 6 decibels per every doubling of distance (which means it also increases 6 dB for every halving of distance). So, for example, if the noise is 88 dBA at 50 feet, it will be 82 dBA at 100 feet and 76 dBA at 200 feet. The noise level does not attenuate linearly with distance because the decibel scale is logarithmic (like the Richter scale for earthquakes).

According to F.M.C. Sec. 10-106, the *prima facia* noise limit for most noises is 5 dB over the ambient. Using the statutory daytime (7:00 am – 7:00 pm) ambient of 60 dBA, the *prima facia* limit is 65 dBA. However, as noted above, construction noise levels are exempted by the F.M.C. from the normal *prima facia* noise limit, so what is a reasonable threshold of significance? I believe a reasonable limit is the *prima facia* limit plus another 5 dB., i.e., the ambient plus 10 dB. Given the statutory ambient, this is 70 dBA between 7:00 am and 7:00 pm.

Returning to Table I, one can see that not only is the average noise level for every construction phase well over 70 dBA, the lower end of the expected range is also over 70 dBA for every phase. This is direct evidence that unmitigated construction noise will cause a significant impact on residents immediately adjacent to the project site (namely, residents of the 11 homes between 7003 and 7063 Harmony Drive, inclusive).

Another way to look at this is to consider how far away the construction will have to be for the noise level to drop to 70 dBA. If the noise level at 50 feet is 88 dBA, the construction would have to be 400 feet away for the level to attenuate to 70 dBA. However, the width of the site from east to west is only 350 feet. So, if the average construction noise level is 88 dBA at 50 feet, it will be greater than 70 dBA for the entire period of the phase.[3] Focusing on the first four phases of construction, Table II shows the percentage of the 350-foot wide site for which the noise level will be greater than 70 dBA.

[3] This is strictly true for the Ground Clearing, Excavation, and Foundation phases. Potentially less so for the Erection phase if some built portions block noise from other portions being built. For the Finishing phase the noise levels would only match the levels shown in Table I for areas that have a direct line of sight to the off-site receptor.

**TABLE II PERCENT OF SITE ON WHICH NOISE WILL EXCEED 70 dBA**

| Phase | Average | Range |
|---|---|---|
| Ground clearing | 64% | 25% to 100% |
| Excavation | 100% | 45% to 100% |
| Foundations | 51% | 16% to 100% |
| Erection | 51% | 16% to 100% |

For each of the first four phases of construction, the noise level is expected to exceed 70 dBA for more than 50% of the site. This indicates the longevity of time that residences of Harmony Drive will be subjected to construction noise levels at least 10 dB higher than the statutory ambient and 5 dB higher than the *prima facia* noise limit established by the F.M.C.

## Concluding Comments

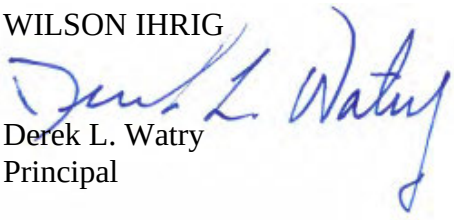
The Environmental Assessment upon which the Categorical Exemption for this project is based concludes that there will not be a temporary noise impact based on a legal technicality, disregarding the intent and spirit of CEQA. Using construction noise level estimates published by the EPA, an ambient noise level based on the Fresno municipal code, and a reasonable threshold of significance also founded upon the municipal code, I have demonstrated by simple analysis that, in fact, the residents of Harmony Drive will be likely be subjected to a temporary, significant noise impact by the construction of the Lincoln Park Apartments project.

* * * * *

Please let me know if you have any questions about these comments on Lincoln Park Apartments environmental noise assessment that was produced to support a Categorical Exemption for the project.

Very truly yours,

WILSON IHRIG



Derek L. Watry
Principal

| | |
|---|---|
| **From:** | [redacted] |
| **To:** | Adrienne Asadoorian |
| **Cc:** | Jerry Dyer; gbredefeld@fresnocountyca.gov |
| **Subject:** | Letter against Text Amendment Application P24-00794 and Mitigated Negative Declaration (SCH NO. 2024110662) |
| **Date:** | Tuesday, February 11, 2025 8:43:52 AM |

**External Email:** Use caution with links and attachments

TO:

Adrienne Asadoorian-Gilbert,
Supervising Planner,
City of Fresno
Planning and Development Dept.,
2600 Fresno St.
Fresno CA 93721-3604

Dear Ms. Asadoorian-Gilbert,

We are writing in opposition to the proposed Text Amendment Application P24-00794 and Mitigated Negative Declaration (SCH NO. 2024110662) for the City of Fresno. Although these proposals affect the whole city, my comments are in reference to the current vacant lots bordering the North and South sides of Herndon Avenue between the streets of North Marks Avenue and North Milburn Avenue. Please enter these comments into the public record regarding these proposals.

Specifically:

We are against the repeal of Fresno Municipal Code Section 15-1106 as proposed in the Text Amendment Application P24-00794. Removal of this section of the Municipal Code would give the City a green light to ignore required road, parking, pedestrian/bicycle route and traffic signal upgrades under the Fresno Complete Street Policy dated Sept 26, 2019 with new RM-1, RM-2 and RM-3 developments. Fresno Municipal Code Section 15-1106 also requires the City to do traffic impact studies

for all development with 300 or more peak hour new vehicle trips. This would be done away with if this section is repealed.

In regards to the Text Amendment Application P24-00794, I have the following concerns/comments specifically relating to the vacant lots running along both the North and South sides of Herndon Avenue, between N. Marks Avenue and N. Milburn Avenue:

Section 4.1a "Aesthetics". The study is flawed when it states that there would be less than significant impacts to scenic vistas with RM-3 developments. RM-3 allows for the construction of up to 45 living units per acre (which could easily house 4 people per unit) and up to 60 feet in height. Apartment units that are 60 feet in height would be a blight on a neighborhood that consists of primarily single story dwellings (houses, apartments, condos and townhomes). If any of the vacant lots along both sides of Herndon Avenue between Marks and Milburn Avenues were converted to RM-3, it would create an aesthetically unpleasant situation for current residents and for the city. As an example, I will refer the Planning Commission to how much the Clinton Avenue Apartments (at 1538 E. Clinton) stand out like a sore thumb when compared to the surrounding neighborhood of single family homes, and they are only *4 stories* high (see attached photo).

Section 4.11. "Land Use Planning". If RM-3 development is allowed in these lots along the Herndon corridor, it would physically constrict travel between the already established neighborhoods along the North side of Herndon Avenue with access to Herndon Avenue along Marks, Valentine and Brawley Avenues. RM-3 development in these lots would introduce new, incompatible uses that are inconsistent with the current land use planning. I specifically note that the Text Amendment Application P24-00794 does not propose the construction of any new roadways which may be needed to handle increased traffic flow if RM-3 zoning is allowed.

Section 4.13. "Noise". The study is flawed in that there would be a significant negative impact due to increased traffic noise, especially during key commute hours.

Section 4.14. “Population and Housing”. The Text Amendment Application P24-00794 would significantly negatively impact the inducement of unplanned population growth in an area originally planned for offices.

Section 4.15. “Public Services”. The allowance of RM construction in these lots currently zoned for office space would exasperate overcrowding in Tatarian Elementary School. Impaired access of Ladder Fire Trucks at the traffic circle along N. Prospect Avenue has already been addressed in earlier hearings.

Sections 4.17 a, c and d. “Transportation”. As pointed out above, there already is inadequate emergency vehicle access along the traffic circle on North Prospect Avenue. Large fire ladder trucks would have a difficult time negotiating the current traffic flow along North Prospect and the frontage road (called North Valentine Ave). If RM3 is approved for this street, traffic flow will be impeded during peak traffic hours, including any emergency vehicles coming into the area during these times. The finding in Section 4.17 (a) is flawed in that there are no sidewalks (or bike path) along the Herndon frontage road between North Prospect Ave and N. Valentine Avenue allowing for safe passage of pedestrians and bicyclists.

Bottom line, we understand that we need more housing in Fresno. I’m OK with the addition of single-story townhomes, apartments and condos along the Herndon Corridor. But, high density RM3 units that are 60 feet tall? No!! those are totally incompatible all neighborhoods in Fresno with the exception of downtown where there are other high rise buildings. Let’s keep the buildings along this section of the Herndon avenue corridor to two stories or less.
We are asking the Planning Commission to use some common sense when developing land for new housing that works for ALL of our residents. Bypassing *years* of thoughtful planning with the Development Code is not what the residents of the City of Fresno expect nor deserve from their leaders. We recommend we continue to abide by the current 2024 Zoning Standards and to **NOT** adopt the Text Amendment Application P24-00794 and the Mitigated Negative Declaration (SCH NO. 2024110662) for the City of Fresno.

*Sincerely,*

**Scott and Janet Nichols,**

[redacted]


1538

**DIRK POESCHEL**
*Land Development Services, Inc.*
923 Van Ness Avenue, Suite 200 • Fresno, California 93721
559/445-0374 • Fax: 559/445-0551 • email: dirk@dplds.com

January 22, 2025

Ms. Jennifer Clark, Director
City of Fresno
Planning & Development Department
2600 Fresno St., Room 3043
Fresno, CA 93721

Subject: Text Amendment Application No. P24-00794
"Residential in Office" Text Amendment Request

Dear Ms. Clark:

Reference is made to the city-initiated Text Amendment Application No. P24-00794 which would allow residential uses in the "O" district. The city's efforts to expand residential uses and allow more flexibility for development options in the "O" district are applauded.

This letter requests that the scope of the text amendment be expanded to include *all* residential uses that are allowed by the city's ordinance. Such expansion would optimize the office zone by accommodating the full spectrum of residential uses and provide greater flexibility of development options within the city.

Thank you for your consideration of this request. If you have any questions, please feel free to call me.

Sincerely,

Dirk Poeschel

Dirk Poeschel, AICP

cc: Ms. Sophia Pagoulatos
Ms. Adrienne Gilbert-Asadoorian

https://dplds.sharepoint.com/shared documents/current clients/fresno guest homes 20-45/correspondence/text amendment request.doc

**We are Unable to Attend the February 19, 2025 Planning Commission meeting. However, we would like to voice our objection to the Text Amendment Application No. P24-00794 and Mitigated Negative Declaration Sch. No. 2024110662. We respectfully ask that you remove the developed and undeveloped properties on Herndon Ave from Marks to Milburn from this Text Amendment Application No. P24-00794. We would also ask that these properties be exempted from Mitigated Negative Declaration Sch. No. 2024110662.**

| Signature | Print |
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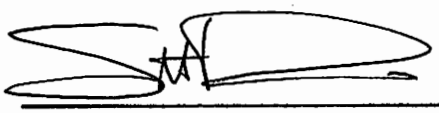
|  | SCOTT BROWNING |
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**Send your "Unable to Attend" Objection Signature Sheet to Supervising Planner Adrienne Asadoorian-Gilbert:**

**Adrienne.Asadoorian@fresno.gov**
**Cc: Fresno Planning Commission c/o: Adrienne.Asadoorian@fresno.gov**
**Cc:** [redacted]

**Before 4 p.m.**
**on**
**February 18th, 2025**

# IMPORTANT PLANNING COMMISSION MEETING
## Wednesday, February 19, 2025
## 6 p.m. CITY HALL
### 2600 Fresno Street, 2nd Floor

There is going to be a Public Hearing on Text Amendment Application No. P24-00794
and
Mitigated Negative Declaration SCH NO. 2024110662

This will allow ministerial re-zoning of developed and undeveloped parcels zoned for office within a half-mile of an existing bus stop to multi-family. This can be ministerially approved up to 45 Units per acre and SIXTY feet tall, subject to the city development code.

You can google City of Fresno Parking rules for information on parking and the meters.

This is a VERY IMPORTANT MEETING. We need YOU and every adult in your household to attend.

If you wish to speak, you will need to fill out a card and the clerk will call you. You will need to get there early to go through security and register to speak. If we FILL THE CHAMBERS and we MUST, comments will likely be limited to 2 minutes.

Please DO NOT speak about school redistricting, crime, declining home values, or Section 8.
DO NOT disparage renters.

Focus on SAFETY, INFRASTRUCTURE, and QUALITY of LIFE ISSUES. PARKING, TRAFFIC, PUBLIC SAFETY ACCESS during school drop-off and pick-up, safety for children and parents walking to and from school are relevant issues.

ASK TO HAVE OUR PARCELS REMOVED FROM THE MAP from Marks to Milburn.
ASK FOR US TO BE EXEMPTED from the Mitigated Negative Declaration.

WE need to SHOW UP in FORCE in the same RESPECTFUL AND UNITED MANNER that we displayed last year. We have worked so hard to protect the neighborhood and this is the worst proposal yet.

WE NEED YOU ALL TO ATTEND THIS MEETING

If you work out of town, have a planned vacation or physical limitation that prevents your attendance, you may sign the attached and email to Supervising Planner Adrienne Asadoorian-Gilbert: Adrienne.Asadoorian@fresno.gov
Cc: Fresno Planning Commission c/o: Adrienne.Asadoorian@fresno.gov
Cc: [redacted]

You may also email your own comments if you wish. COMMENTS MUST BE DONE at least 24 Hours prior to the meeting. No later than 4 p.m. on February 18th.

WE MUST PREVAIL and we need EVERYONE to attend this meeting
SEE YOU THERE

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| Signature | Print |
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|  | Carla Johnson |
|  | William Johnson |
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**Send your "Unable to Attend" Objection Signature Sheet to Supervising Planner Adrienne Asadoorian-Gilbert:**

**Adrienne.Asadoorian@fresno.gov**
**Cc: Fresno Planning Commission c/o: Adrienne.Asadoorian@fresno.gov**
**Cc:** [redacted]

**Before 4 p.m.**
**on**
**February 18th, 2025**

**CITY OF FRESNO**
**PLANNING AND DEVELOPMENT DEPARTMENT**

# NOTICE OF PUBLIC HEARING

## TEXT AMENDMENT APPLICATION NO. P24-00794 AND MITIGATED NEGATIVE DECLARATION (SCH NO. 2024110662)

NOTICE IS HEREBY GIVEN that the Fresno City Planning Commission, in accordance with Sections 15-4902, 15-4903, 15-5809 and 15-5810 of the Fresno Municipal Code and in accordance with the procedures of Article 50, Chapter 15, of the Fresno Municipal Code, will conduct a public hearing to consider the items below, filed by the City of Fresno. At the hearing, the following will be considered:

1. **Mitigated Negative Declaration Sch No. 2024110662:** In accordance with the California Environmental Quality Act (CEQA), a Mitigated Negative Declaration (MND) was prepared by the City to consider potential impacts associated with implementation of the project, and to provide mitigation measures that would reduce impacts to less than significant levels. The Draft MND was released for a 30-day public review period beginning on November 20, 2024 and ending on December 20, 2024.
2. **Text Amendment Application No. P24-00794** consideration of a citywide text amendment that would amend Sections 15-1302, 15-4907, 15-5102, 15-6702, 15-6802 of the Fresno Municipal Code, repeal Section 15-1106 of the Fresno Municipal Code, and establish Section 15-2742.5 of the Fresno Municipal Code, to permit ministerial approval of housing projects in the following instances as noted below:
    a. Ministerial approval of office to dwelling conversions in the Office zone district; and
    b. Ministerial approval of multi-unit residential development in the RM-1, RM-2, and RM-3 zone districts on parcels within one-half mile of an existing bus stop; and
    c. Ministerial approval of multi-unit residential uses in the NMX, CMX, RMX, CMS and CR zone districts on parcels within the City's Infill Priority Area; and
    d. Ministerial approval of new multi-unit residential development in the Office zone district.

*The above documents are available for public review via e-mail (noted below) and within the upcoming Planning Commission agenda. Please contact the Planner identified below or visit the webpage https://www.fresno.gov/planning/plans-projects-under-review/#mixed-use-text-amendment for additional information.

***FRESNO PLANNING COMMISSION***

Date: Wednesday, February 19, 2025

Time: 6:00 p.m., or thereafter

Place: City Hall Council Chamber, Second Floor, 2600 Fresno Street, Fresno, CA 93721; or watch the live broadcast via the Zoom link located on the Planning Commission agenda found here: https://fresno.legistar.com/Calendar.aspx

Any interested person may appear at the public hearing and present written testimony, or speak in favor or against the project proposal. However, all documents submitted to the Planning Commission for its consideration shall be submitted to the Planning and Development Department at least 24 hours prior to the Planning Commission Agenda item being heard, pursuant to Article 4(3), or they may be excluded from the administrative record of proceedings. If an individual challenges the above applications in court, they may be limited to raising only those issues that were raised at the public hearing described in this notice, or in written correspondence delivered to the Development Services Division of the Planning and Development Department and/or Planning Commission consistent with their respective rules of procedure at, or prior to, the public hearing. The Planning Commission recommendation on the proposed Text Amendment and Environmental Assessment will be considered by the City Council.
NOTE: This public hearing notice is being published in the Fresno Bee pursuant to the requirements of Fresno Municipal Code Section 15-5007.

For additional information regarding this project, contact Adrienne Asadoorian-Gilbert, Supervising Planner, Planning and Development Department, 2600 Fresno Street, Fresno, California 93721-3604, by phone at (559) 621-8339 or via e-mail at Adrienne.Asadoorian@fresno.gov. *Si necesita información en Español, comuníquese con Yamilex Nava al teléfono (559) 621-8028 o por correo electrónico a Yamilex.Nava@fresno.gov.*

We are Unable to Attend the February 19, 2025 Planning Commission meeting. However, we would like to voice our objection to the Text Amendment Application No. P24-00794 and Mitigated Negative Declaration Sch. No. 2024110662. We respectfully ask that you remove the developed and undeveloped properties on Herndon Ave from Marks to Milburn from this Text Amendment Application No. P24-00794. We would also ask that these properties be exempted from Mitigated Negative Declaration Sch. No. 2024110662.

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Send your "Unable to Attend" Objection Signature Sheet to Supervising Planner Adrienne Asadoorian-Gilbert:

Adrienne.Asadoorian@fresno.gov
Cc: Fresno Planning Commission c/o: Adrienne.Asadoorian@fresno.gov
Cc: [redacted]

**Before 4 p.m.**
**on**
**February 18th, 2025**

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| Robert H. Lindemann | ROBERT H. LINDEMANN |
| Pamela G Lindemann | PAMELA G. LINDEMANN |
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| Paula J Moradian | Paula J Moradian |
| Bruce Moradian | Bruce Moradian |
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| Ralston M Pound III | Ralston M. Pound III |
| Beth A. Pound | Beth A. Pound |
| R. Elliott Stambaugh | R. Elliott Stambaugh |
| Margaret Stambaugh | Margaret Stambaugh |
| Donald C Laines | DONALD C. LAINES |
| David A Bandoni | DAVID A BANDONI |
| | |

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**Adrienne.Asadoorian@fresno.gov**
**Cc: Fresno Planning Commission c/o: Adrienne.Asadoorian@fresno.gov**
**Cc:** [redacted]

**Before 4 p.m.**
**on**
**February 18th, 2025**

**CITY OF FRESNO**
**PLANNING AND DEVELOPMENT DEPARTMENT**

# NOTICE OF PUBLIC HEARING

## TEXT AMENDMENT APPLICATION NO. P24-00794
## AND
## MITIGATED NEGATIVE DECLARATION (SCH NO. 2024110662)

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2. **Text Amendment Application No. P24-00794** consideration of a citywide text amendment that would amend Sections 15-1302, 15-4907, 15-5102, 15-6702, 15-6802 of the Fresno Municipal Code, repeal Section 15-1106 of the Fresno Municipal Code, and establish Section 15-2742.5 of the Fresno Municipal Code, to permit ministerial approval of housing projects in the following instances as noted below:
    a. Ministerial approval of office to dwelling conversions in the Office zone district; and
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*The above documents are available for public review via e-mail (noted below) and within the upcoming Planning Commission agenda. Please contact the Planner identified below or visit the webpage https://www.fresno.gov/planning/plans-projects-under-review/#mixed-use-text-amendment for additional information.

***FRESNO PLANNING COMMISSION***

Date: Wednesday, February 19, 2025

Time: 6:00 p.m., or thereafter

Place: City Hall Council Chamber, Second Floor, 2600 Fresno Street, Fresno, CA 93721; or watch the live broadcast via the Zoom link located on the Planning Commission agenda found here: https://fresno.legistar.com/Calendar.aspx

Any interested person may appear at the public hearing and present written testimony, or speak in favor or against the project proposal. However, all documents submitted to the Planning Commission for its consideration shall be submitted to the Planning and Development Department at least 24 hours prior to the Planning Commission Agenda item being heard, pursuant to Article 4(3), or they may be excluded from the administrative record of proceedings. If an individual challenges the above applications in court, they may be limited to raising only those issues that were raised at the public hearing described in this notice, or in written correspondence delivered to the Development Services Division of the Planning and Development Department and/or Planning Commission consistent with their respective rules of procedure at, or prior to, the public hearing. The Planning Commission recommendation on the proposed Text Amendment and Environmental Assessment will be considered by the City Council.
NOTE: This public hearing notice is being published in the Fresno Bee pursuant to the requirements of Fresno Municipal Code Section 15-5007.

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[redacted]



Important - City Hall M ... e Open with n .pdf

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Ministerial approval is a type of administrative approval that involves little to no personal judgment. It's often used to grant permits for development projects.

### How it works

- A ministerial approval is granted if a proposed project meets established standards
- If standards aren't met, staff may work with the applicant to help them meet them
- If standards can't be met, the applicant may need to seek discretionary approval

Examples of ministerial approval Some tree trimming and removal permits, Film permits, Zoning clearances, Building permits, and Grading permits.

### Streamlined ministerial approval

- Some cities have streamlined ministerial approval processes to expedite the processing of certain projects
- For example, Los Angeles' Executive Directive 1 (ED 1) expedites the processing of affordable housing projects

- Ministerial function is when an authority has a duty to do something in a particular way
- Ministerial act is a non-discretionary permit, plan, or other document that's required to be issued or approved

**RIVER PARK PROPERTIES III**
Lance-Kashian & Company
265 E. River Park Circle, Suite 420
Fresno, California 93720
Phone (559) 438-4800 Facsimile (559) 438-4802

September 27, 2023 Via: Electronic Mail

Ms. Jennifer Clark, Director
City of Fresno, Development and Resource Management
2600 Fresno Street, Room 3043,
Fresno, CA 93721

**Re: Proposal to Expand Development Code Amendment to Allow Multifamily Housing on Vacant Properties Planned and Zoned for Office Use**

Dear Ms. Clark,

I hope all is good with you as we enter the beautiful Fall weather. It is my understanding that the Development and Resource Management department is initiating a Development Code amendment that would permit multifamily residential development on properties planned and zoned for office uses. As I understand, the amendment is intended to apply to existing vacant office buildings only, and its primary purpose is to increase the availability of much needed housing in our community.

I would respectfully request that you consider expanding this amendment to allow multifamily housing on vacant properties planned and zoned for office uses. As a longtime experienced commercial property developer, owner, and manager and because of progressively changing office work habits and ever improving off-site work technology, I am convinced the City has an overabundance of planned future office space. I sincerely believe this proposal will maximize the use of vacant land and better help the city achieve its General Plan infill and housing goals while significantly reducing vehicle trips and air pollution. We have developed a site plan for a seven-story residential project at the intersection of Friant Road and Fresno Street and I would very much like to meet and present it to you. We understand that our proposal could be viewed as too broad, given the hundreds of vacant acres planned for office use. However, I believe the amendment can be structured to achieve the outcomes described above.

Thank you for your consideration of this request.

Sincerely,

Salvador Gonzales
President

SG/lc

cc: Mr. Edward M. Kashian

# Proposed Apartments Prospect and West Fir. P21-00989

July 17, 2021

We object to the arbitrary and quiet way that this parcel was re-zoned with absolutely no input from the neighborhood and no consideration for the very limited infrastructure available. This is in addition to a completely unworkable median and roundabout that was added to one of our main entrance and exit streets when the Wilson Development was built. The Valentine frontage road is nothing more than a country road with asphalt on it. It was never designed for high density and the existing neighborhoods have been cut off from using Prospect because of the unworkable design.

We object to any development over two stories. The entire neighborhood has nothing over two stories and there are very few, if any, apartments in Fresno over two stories. This small intersection cannot handle such high density.

We also object to the ingress and egress onto Prospect. If the City keeps the promise that was made when the park was built and moves the frontage road to connect with Beechwood , this intersection might become a useable feeder street to the school and the existing neighborhoods again. If 40 additional cars feed onto Prospect at peak times , it could back traffic up out onto Herndon. It could also interfere with public safety accessing the existing neighborhoods at peak times which is already a neighborhood concern.

We also object to anything less than two parking spaces per unit. There is absolutely NO STREET PARKING anywhere near these apartments. The City ran the Herndon Bike Lane through the neighborhood any they have posted No Parking signs throughout the immediate area. The existing original neighborhood is already impacted with traffic and parking issues as a result of the woefully inadequate parking that the city provided for Orchid Park. The 1.88 parking spaces includes guest parking , so that will not be adequate when the nearest street parking would be at the next intersection and that area is already overrun with traffic and parking issues when school is in session and during soccer season. Parking and traffic issues are complaints made by tenants of the apartment complex that this development is patterned after.

Lastly, we ask you to consider the fact that there are three other parcels along Herndon to be developed using the very limited infrastructure that is available. The unworkable intersection has transferred nearly all of the traffic that used to use Valentine/Prospect to Brawley. This has burdened many residential streets with heavy traffic during peak times. The original neighborhoods have had to keep making adjustments because of changes to the plans for the neighborhood which do not take into consideration the real life impacts. The quality of life for the original neighborhoods has already deteriorated. Please do not approve this Development as currently proposed.

Debbie Nard
[redacted]

October 7, 2021

Ms. Jennifer Clark
Director Planning & Development
2600 Fresno Street, Room 3065
Fresno, CA 93721

Dear Ms. Clark,

Our neighborhood representatives have been asking for a meeting concerning the Prospect and Fir intersection. There is a high-density project proposed (P21-00989) to ingress and egress off of Prospect, a street that was never designed to handle high density. The street has mostly been abandoned by the large original neighborhoods who used it for ingress and egress to Herndon. The planners I have talked to seemed surprised that to enter Herndon from the frontage road, you have to go the wrong way if there are already two cars or trucks in any of the lanes.

Entering Herndon from Valentine will not ever be possible if this high-density project has cars coming around the roundabout at peak times. The project should definitely not ingress and egress off of Prospect. All other development in this area ingresses and egresses off of Beechwood which runs into Fir, so to be consistent and take the pressure off of the very limited and inadequate infrastructure, the ingress and egress for this project and all future projects including P21-04099 should be either on Beechwood or Fir.

The neighborhood has been promised for years, starting when Orchid Park was built, that the frontage road would be moved to line up with Beechwood. This would be a more direct route in to and out of the existing neighborhood. Since we only have two direct streets to ingress and egress the existing neighborhoods and the school, we must be very aware of what happens on both Prospect and Brawley. The limited infrastructure must be considered. Brawley and Valentine are heavily taxed at peak times with school and office traffic.

We have been asking for a meeting to discuss this concern. We are aware that a traffic counter was placed on Valentine one day last week. As previously stated many times, existing neighborhoods have abandoned this intersection for the most part because it is dangerous. By the time we found out about the counter, it was gone. So, I don't know how accurate the information is. We would use the intersection if we could, but it does not work, is universally hated and is considered to be "an accident waiting to happen."

We have asked to have you come out and meet with our committee and view the traffic flow on Brawley and Prospect. We have had no response other than traffic does not usually go out and look at projects in person.

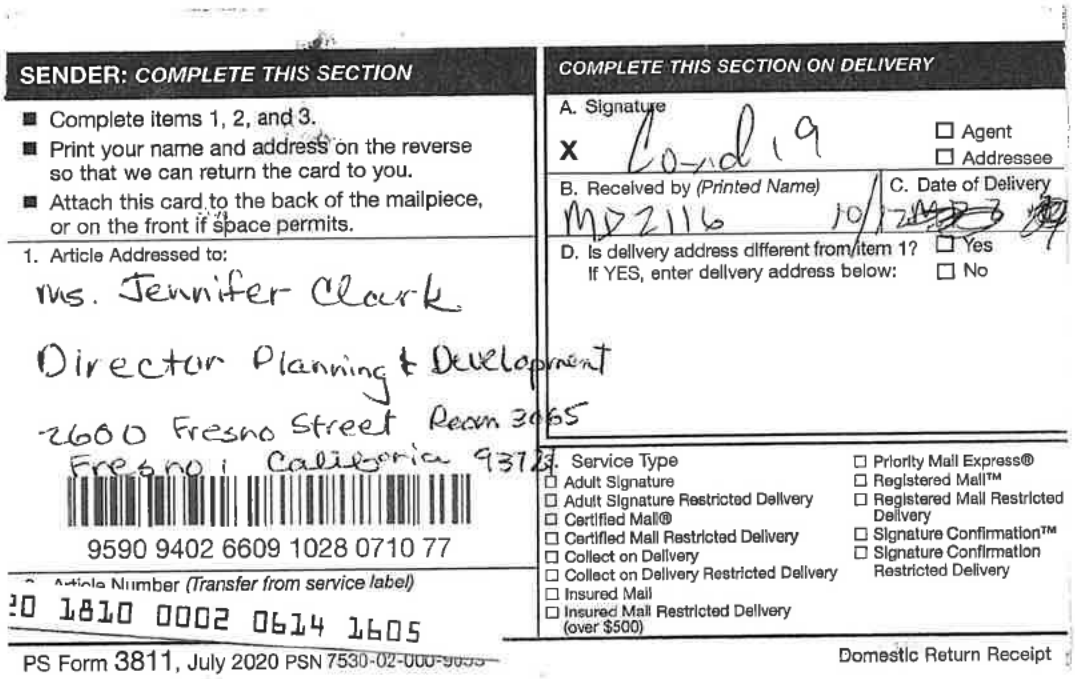
We want to see how this intersection is going to work, so we are respectfully requesting a meeting with you, Scott Mozier and Jill Gormley. It can be scheduled at City Hall at your convenience.

We would appreciate a reply to this letter within 30 days or we will be forced to take other action.

Sincerely,

Debbie Nard

[redacted]



**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Ms. Jennifer Clark

Director Planning & Development

2600 Fresno Street Room 3065

Fresno, California 93721

9590 9402 6609 1028 0710 77

Article Number (Transfer from service label)

70 1810 0002 0614 1605

PS Form 3811, July 2020 PSN 7530-02-000-9053

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature

X Lord 19 ☐ Agent ☐ Addressee

B. Received by (Printed Name) MD2116 C. Date of Delivery 10/

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If YES, enter delivery address below: ☐ No

Service Type

- ☐ Adult Signature
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- ☐ Certified Mail®
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- ☐ Insured Mail Restricted Delivery (over $500)
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- ☐ Registered Mail™
- ☐ Registered Mail Restricted Delivery
- ☐ Signature Confirmation™
- ☐ Signature Confirmation Restricted Delivery

Domestic Return Receipt

Debbie Nard
[redacted]

October 7, 2021

Ms. Jill Gormley
Traffic Engineering Manager
2600 Fresno Street, Room 2075
Fresno, CA 93721

Dear Ms. Gormley,

Our neighborhood representatives have been asking for a meeting concerning the Prospect and Fir intersection. There is a high-density project proposed (P21-00989) to ingress and egress off of Prospect, a street that was never designed to handle high density. The street has mostly been abandoned by the large original neighborhoods who used it for ingress and egress to Herndon. The planners I have talked to seemed surprised that to enter Herndon from the frontage road, you have to go the wrong way if there are already two cars or trucks in any of the lanes.

Entering Herndon from Valentine will not ever be possible if this high-density project has cars coming around the roundabout at peak times. The project should definitely not ingress and egress off of Prospect. All other development in this area ingresses and egresses off of Beechwood which runs into Fir, so to be consistent and take the pressure off of the very limited and inadequate infrastructure, the ingress and egress for this project and all future projects including P21-04099 should be either on Beechwood or Fir.

The neighborhood has been promised for years, starting when Orchid Park was built, that the frontage road would be moved to line up with Beechwood. This would be a more direct route in to and out of the existing neighborhood. Since we only have two direct streets to ingress and egress the existing neighborhoods and the school, we must be very aware of what happens on both Prospect and Brawley. The limited infrastructure must be considered. Brawley and Valentine are heavily taxed at peak times with school and office traffic.

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We have asked to have you come out and meet with our committee and view the traffic flow on Brawley and Prospect. We have had no response other than traffic does not usually go out and look at projects in person.

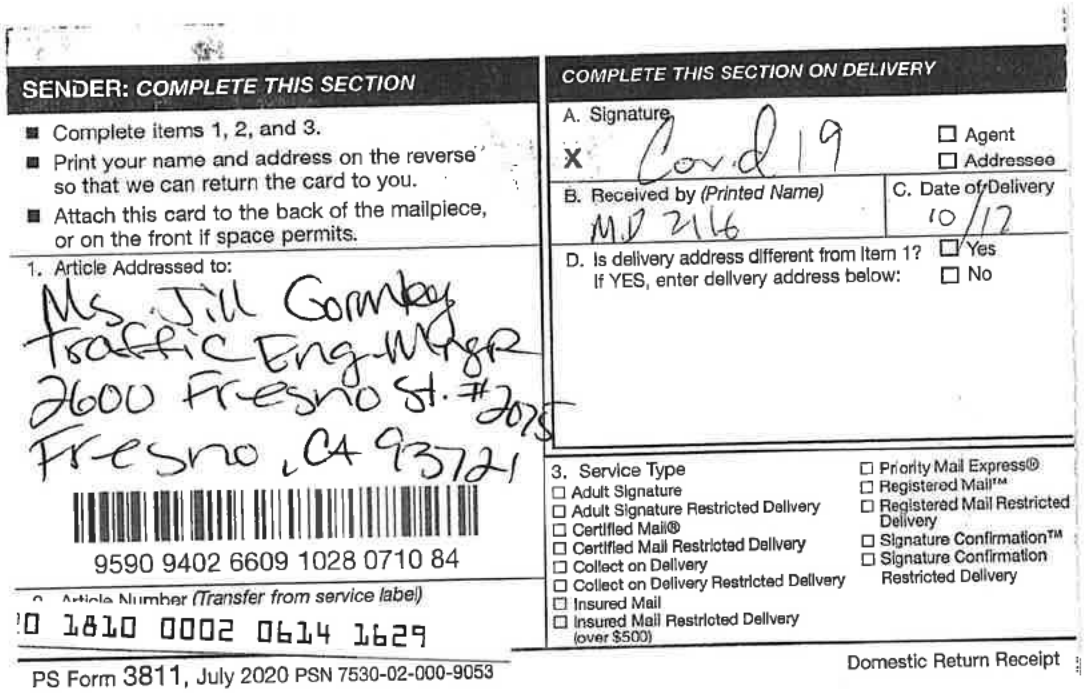
We want to see how this intersection is going to work, so we are respectfully requesting a meeting with you, Scott Mozier and Jennifer Clark. It can be scheduled at City Hall at your convenience.

We would appreciate a reply to this letter within 30 days or we will be forced to take other action.

Sincerely,

Debbie Nard

[redacted]



**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3.
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1. Article Addressed to:

Ms. Jill Gormley
Traffic Eng. Mgr
2600 Fresno St. #2075
Fresno, CA 93721

9590 9402 6609 1028 0710 84

2. Article Number (Transfer from service label)
70 1810 0002 0614 1629

PS Form 3811, July 2020 PSN 7530-02-000-9053

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature
X Covd 19
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☐ Addressee

B. Received by (Printed Name)
M.D 216

C. Date of Delivery
10/12

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3. Service Type
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☐ Registered Mail™
☐ Registered Mail Restricted Delivery
☐ Signature Confirmation™
☐ Signature Confirmation Restricted Delivery

Domestic Return Receipt

Debbie Nard
[redacted]

October 7, 2021

Mr. Scott Mozier, Director
Department of Public Works
2600 Fresno Street, Room 4016
Fresno, CA 93721

Dear Mr. Mozier,

Our neighborhood representatives have been asking for a meeting concerning the Prospect and Fir intersection. There is a high-density project proposed (P21-00989) to ingress and egress off of Prospect, a street that was never designed to handle high density. The street has mostly been abandoned by the large original neighborhoods who used it for ingress and egress to Herndon. The planners I have talked to seemed surprised that to enter Herndon from the frontage road, you have to go the wrong way if there are already two cars or trucks in any of the lanes.

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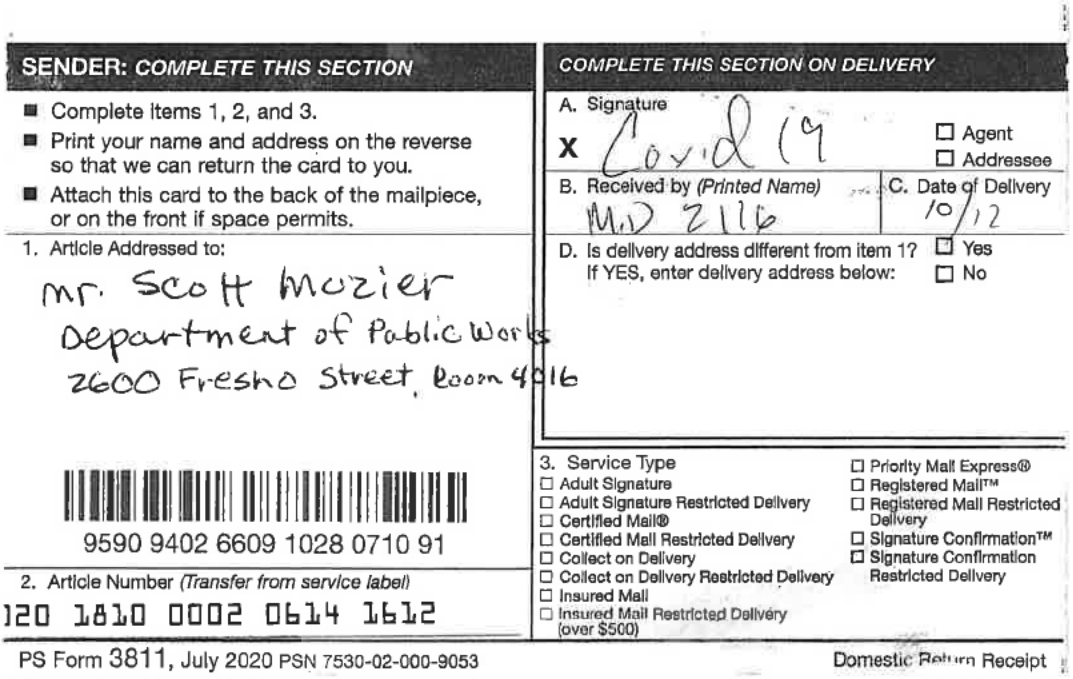
We would appreciate a reply to this letter within 30 days or we will be forced to take other action.

Sincerely,

Debbie Nard

[redacted]



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1. Article Addressed to:

mr. Scott Mozier
Department of Public Works
2600 Fresno Street, Room 4016

9590 9402 6609 1028 0710 91

2. Article Number *(Transfer from service label)*

120 1810 0002 0614 1612

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A. Signature

X Covid 19 ☐ Agent ☐ Addressee

B. Received by *(Printed Name)* M.D 2116

C. Date of Delivery 10/12

D. Is delivery address different from item 1? ☐ Yes
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3. Service Type

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- ☐ Insured Mail Restricted Delivery (over $500)
- ☐ Priority Mail Express®
- ☐ Registered Mail™
- ☐ Registered Mail Restricted Delivery
- ☐ Signature Confirmation™
- ☐ Signature Confirmation Restricted Delivery

PS Form 3811, July 2020 PSN 7530-02-000-9053 Domestic Return Receipt




2 Main Service Roads Brawley Avenue & Marks Avenue to access San Joaquin Country Club Estates, San Joaquin Estates and Sierra Sky Park's neighborhood community

Prospect Avenue to Valentine Avenue you must complete a 360 turnaround at the roundabout and use the frontage road to Valentine

We are Unable to Attend the February 19, 2025 Planning Commission meeting. However, we would like to voice our objection to the Text Amendment Application No. P24-00794 and Mitigated Negative Declaration Sch. No. 2024110662. We respectfully ask that you remove the developed and undeveloped properties on Herndon Ave from Marks to Milburn from this Text Amendment Application No. P24-00794. We would also ask that these properties be exempted from Mitigated Negative Declaration Sch. No. 2024110662.

| Signature | Print |
|---|---|
| [redacted] | [redacted] |
| Kathy Mock | Kathy Mock |
| Meredith Mock | Meredith Mock |
| | |
| | |
| | |
| | |

Send your "Unable to Attend" Objection Signature Sheet to Supervising Planner Adrienne Asadoorian-Gilbert:

Adrienne.Asadoorian@fresno.gov
Cc: Fresno Planning Commission c/o: Adrienne.Asadoorian@fresno.gov
Cc: [redacted]

**Before 4 p.m.**
**on**
**February 18th, 2025**

**We are Unable to Attend the February 19, 2025 Planning Commission meeting. However, we would like to voice our objection to the Text Amendment Application No. P24-00794 and Mitigated Negative Declaration Sch. No. 2024110662. We respectfully ask that you remove the developed and undeveloped properties on Herndon Ave from Marks to Milburn from this Text Amendment Application No. P24-00794. We would also ask that these properties be exempted from Mitigated Negative Declaration Sch. No. 2024110662.**

| Signature | Print |
|---|---|
| Gwenith Coson | Gwenith Coson |
| Aaron Waldo | Alison Waldo |
| Heather J | Heather Gann |
| Aiyanah G | Aiyanah Gann |
| for JG | Jerry Gann |
| | Gina Serpa |
| Angela Marioni | ANGELA MARIONI |

**Send your "Unable to Attend" Objection Signature Sheet to Supervising Planner Adrienne Asadoorian-Gilbert:**

Adrienne.Asadoorian@fresno.gov
**Cc: Fresno Planning Commission c/o:** Adrienne.Asadoorian@fresno.gov
**Cc:** [redacted]

**Before 4 p.m.**
**on**
**February 18th, 2025**

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| Signature | Print |
|---|---|
| Audrey Peters | Audrey Peters |
| | Joshua Woods |
| | Tyler Peters |
| Elia Dusi | Elia Dusi |
| | |
| | |
| | |

**Send your "Unable to Attend" Objection Signature Sheet to Supervising Planner Adrienne Asadoorian-Gilbert:**

Adrienne.Asadoorian@fresno.gov
**Cc: Fresno Planning Commission c/o:** Adrienne.Asadoorian@fresno.gov
**Cc:** [redacted]

**Before 4 p.m.**
**on**
**February 18th, 2025**

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| Signature | Print |
|---|---|
| | Chu-Hang Sam Pan |
| | Julie Saylor |
| | James Saylor |
| | CHRIS TURNER |
| | |
| | |
| | |

Send your "Unable to Attend" Objection Signature Sheet to Supervising Planner Adrienne Asadoorian-Gilbert:

Adrienne.Asadoorian@fresno.gov
Cc: Fresno Planning Commission c/o: Adrienne.Asadoorian@fresno.gov
Cc: [redacted]

**Before 4 p.m.**
**on**
**February 18th, 2025**

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| Signature | Print |
|---|---|
| | Mike Manson |
| | AARON EPPLERLY |
| | JAMES G PALMER. |
| | STEVEN HOWELL |
| Sue Garabedian | Sue Garabedian |
| | Jim Bohanon |
| Brenda Paz | Brenda Paz |

**Send your "Unable to Attend" Objection Signature Sheet to Supervising Planner Adrienne Asadoorian-Gilbert:**

Adrienne.Asadoorian@fresno.gov
**Cc: Fresno Planning Commission c/o:** Adrienne.Asadoorian@fresno.gov
**Cc:** [redacted]

**Before 4 p.m.**
**on**
**February 18th, 2025**

Sunnyside Property Owners Association
*Serving Sunnyside for 75 Years*

February 28, 2025

Adrienne Asadoorian-Gilbert
Supervising Planner
Long Range Planning & Development Department
City of Fresno
2600 Fresno Street
Fresno, CA 93721

ATT: Ms. Asadoorian-Gilbert

RE: Text Amendment Application No. P24-00794

The Board of Directors of the Sunnyside Property Owners Association offer the following comments on the above referenced Text Amendment Application allowing multi-family in the Office Zone District and **ministerial approval** of:

- Office to dwelling conversion within the Office Zone District
- New standalone multi-unit residential development in the Office District
- Multi-Unit Residential development within 1/2 mile of an existing bus stop
- Multi-Unit Residential uses in Mixed-Use Districts within the City's Infill Priority Area

This text amendment should be denied for a host of reasons: it replaces those office uses that are essential to neighborhoods, defaults to the greatest density allowed in Residential Multi-Family Zone Districts on vacant or underdeveloped parcels in the Office District, prevents the public from providing input for Multi-Family in Office Zone Districts, next to transit stops and Mixed Use Districts in the City's Priority Infill Area, *and contributes only a fraction of additional housing unit capacity that is neither necessary or required.*

While the Project could result in a buildout of 22,425 units over the next thirty years, **Office-to-Dwelling Conversions and New Residential Development on Office Parcels will *yield only 4,868* additional units**. **The other 17,557 units are currently allowable uses consistent with the General Plan land use designation and underlying zone district.** The Sixth Cycle Housing Element allocation for the City of Fresno is 37,000 new homes by 2031. The city has stated **that the inventory of property zoned or planned for residential development *already* provides sufficient capacity for the allocated number of homes, with a surplus of 6,800 units.**

This text amendment would allow ministerial approval of all multi-unit residential units in the Office District, within 1/2 miles of an existing bus stop and in mixed-use districts within the City's Infill Priority Area. *Ministerial approval not only* ***eliminates a hearing before the Planning Commission and City Council, but prevents all advisory and Project Review Committees from reviewing projects*** *as well. Most importantly, the most egregious aspect of replacing discretionary with ministerial review, for projects that have in some cases, no density cap or parking requirements,* ***is the inability for the public to provide comment on development proposals that impact their neighborhoods the most.***

The City's Mixed Use Text Amendment (MUTA), adopted by Council in 2022, removed the maximum density caps for multi-family in all mixed-use districts within the City's Priority Areas for Development, *raising the allowed density by 200 to 500%.* ***This amendment also proposed ministerial review, but the provision <u>was not included</u> in the final text*.**

That same year, the state adopted Assembly Bill 2097 which **prohibits a public agency from imposing *minimum parking requirements* on any residential, commercial or other development project located within one-half mile of a major transit stop.**

**Collectively, these two actions resulted in open-ended density for multi-family development, absent parking when located next to a major transit stop, for all mixed use districts within the City's Infill Priority Areas.**

**<u>TA P24-00794 builds on the MUTA; adding multi-family development to Office Districts and allowing ministerial review for *all* multi-family units next to transit stops and the City's Infill Priority Areas.</u>**

As defined by FMC Section 15-6704, an "office" use means offices of firms or organizations providing professional, executive, management, administrative or design services such as accounting, architectural, computer software design, engineering, graphic design, interior design, investment, insurance, and legal offices, excluding banks and savings and loan associations. This classification also includes offices where medical and dental services are provided by physicians, dentists, chiropractors, acupuncturists, optometrists, and similar medical professionals including medical/ dental laboratories within medical office buildings but excluding clinics or independent research laboratory facilities and hospitals. Further classifications of "office" use includes business and professional, medical, dental and walk-in clientele.

The Office District is often the most cohesive neighbor to single family residential zoning, providing a buffer from more intense commercial offerings and traffic on street classifications other than Local.

**While the number of multi-family units on developed parcels in the Office District would be limited by the square footage of existing buildings, *new multi-family would default to the most intense density allowed per the City of Fresno's Development Code for Multi-Family Districts at 30-45 dwelling units per acre.*** Introducing multi-family to the Office District, exposes existing neighborhoods to greatly disparate densities and much greater traffic. And if located next to a transit stop, could be developed without any parking.

While the Sunnyside area does not currently enjoy any Office District Zoning, despite the need for medical and dental facilities, we do have substantial acreage east of Clovis Avenue, north and south of Kings Canyon Road, that was rezoned to **Corridor Center Mixed Use** during the last General Plan Update. These developed, underdeveloped and vacant parcels are within the City's Priority Infill District adjacent to the City's Bus Rapid Transit "Q" Line. Per the Mixed Use Text Amendment already adopted by Council, *there is no limit to the number of multi-family units that could be developed (estimated at 50 du/A for purposes of the Mitigated Negative Declaration completed for this Project).* ***This will be the second attempt by the city to eliminate public input in the planning process.***

***We urge the members of the Planning Commission and City Council to deny Text Amendment Application No. P24-00794. It is both unnecessary and an egregious misuse of power. Instead of eliminating the right to comment, the public should be encouraged to become a bigger part of the discussion through planning, advocacy and politics.***

***People have a right to influence what affects them. This amendment removes that right.***

Respectfully,

Sue Williams

For the Board of Directors of the Sunnyside Property Owners Association

**From:** [redacted]
**To:** Adrienne Asadoorian
**Cc:** Mike Karbassi
**Subject:** FW:
**Date:** Sunday, March 2, 2025 3:48:00 PM

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**External Email:** Use caution with links and attachments

**Via E-mail Adrienne.Asadoorian@fresno.gov March 03, 2025**

**William D. Stevens**
[redacted]

Re: City of Fresno
Planning and Development Department
Text Amend. App No. P24-00794
Mitigated Neg. Dec. SCH No. 2024110662

Attention: Ms. Adrienne Asadoorian-Gilbert

This is a pure and simple power play on the part of the City of Fresno. The premise is to give ministerial approval power to deviate from existing land uses supported by zoning districts with minimal to no knowledge of said change by the Community. Let us outline the players involved in the power play and keep it simple:

1. Community Servants paid by taxes (Mayor to Trash Collector).
2. Community Land Owners are the Taxpayers (Rentals, Owners, Landlords).
3. Planning Commission (People in place to represent the Community Land Owners).

**Setting:**

1. Caterer
2. Host
3. Party Coordinator

The Host hires a Party Coordinator to coordinate all aspects of the Party to the Host's best interests. The Host hires a Caterer to provide all nourishment based on the

Host's desire, as stated in the Contract (City Zoning and Land use plan).

The Host agrees to the Contract, signs it and asks the Party Coordinator to oversee the Contract to make sure it is followed through.

To make a long story shorter:  the Caterer decides to do a CHANGE UP on the food and services that are nowhere close to what is in the Contract.

This CHANGE UP is supposedly based on outside influence (State Government, Developers and Friends) and is not his fault.  He is now asking the Coordinator to revise the signed Contract.  The Caterer is saying that they will not service the Contract AS IS.

The Host of the Party is saying "no to the revisions to the Contract."  They are paying for the Contract AS IS. It is the duty of the Party Coordinator to say "NO TO THE REVISIONS."  The Caterer will service the Contract AS IS on behalf of the Host.  The power play by the Caterer will not happen.

I respectfully request that the Planning Commission DENY the power play by the City of Fresno on behalf of the people who pay their wages.

Sincerely,

William D. Stevens

1972 Bachelor of Architecure
1979 Registered Architect, California
1981 NCARB Certificate

**Please confirm receipt by return e-mail.**

**We are Unable to Attend the February 19, 2025 Planning Commission meeting. However, we would like to voice our objection to the Text Amendment Application No. P24-00794 and Mitigated Negative Declaration Sch. No. 2024110662. We respectfully ask that you remove the developed and undeveloped properties on Herndon Ave from Marks to Milburn from this Text Amendment Application No. P24-00794. We would also ask that these properties be exempted from Mitigated Negative Declaration Sch. No. 2024110662.**

| Signature | Print | |
|---|---|---|
| | Alexander Manton | [redacted] |
| | Skyler Manton | [redacted] |
| | Dennis Lee | [redacted] |
| | SHELLEY FARRIS-LEE | [redacted] |
| Virgie Farris | VIRGIE FARRIS | [redacted] |
| | | |
| | | |

**Send your "Unable to Attend" Objection Signature Sheet to Supervising Planner Adrienne Asadoorian-Gilbert:**

**Adrienne.Asadoorian@fresno.gov**
**Cc: Fresno Planning Commission c/o: Adrienne.Asadoorian@fresno.gov**
**Cc:** [redacted]

**Before 4 p.m.**
**on**
**February 18th, 2025**

INVEST FRESNO in Community. in Jobs. in Our Future.

INVESTFresnoCA.com

March 3, 2025

Peter Vang, Chairman
Planning Commission
City of Fresno
2600 Fresno Street, Room 3043
Fresno, CA 93721

**Submitted Electronically**

ATTN: Jennifer Clark, Planning Director
PublicCommentsPlanning@fresno.gov

**RE: SUPPORT – Text Amendment Application No. P24-00794 – Ministerial Approval**

Dear Chairman Vang, Commissioners, and Staff:

I write today on behalf of INVEST Fresno, a coalition of residents, businesses, and community organizations committed to building a diverse and sustainable economy in Fresno, to express our support for Text Amendment P24-00794 – ministerial approval for office-to-dwelling conversions in the office zone, housing near bus stops in multi-family zones, infill residential development in mixed-use zones, and new residential in office zones.

As detailed in the City's Housing Element, it is estimated that Fresno needs to add roughly 37,000 new housing units by 2031 to keep up with the demand of a growing population. With Fresno's prime location and growing workforce, we must shape Fresno into a city where housing availability keeps pace with demand, reduces costs, and strengthens neighborhoods.

Ministerial approvals are a practical, common-sense solution to ensure that various projects can move forward efficiently and timely, without unnecessary delays that drive up costs and limit supply. It is important to note projects that undergo a ministerial approval process must still comply with all applicable state and local development standards and meet all zoning, building, and environmental regulations.

But this isn't just about policy, it's about people. Rising rents and home prices affect everyone. When housing is out of reach, so is opportunity, making it harder for workers, students, and seniors to find stable, affordable places to live. Particularly in recent years, slow-moving red tape processes have created significant barriers to Fresno's growth. The implementation of a ministerial approval process will serve as a step toward building a stronger, more inclusive Fresno, where families can afford to put down roots, invest in their future, and grow in the city we all love.

We have made real progress in increasing housing production and expanding opportunity, but that momentum is not guaranteed. Delays and uncertainty in the approval process only make it

harder and more expensive to build the homes Fresno families need, and if we do not act, families will be forced to leave. We cannot afford to lose our workforce, our small business owners, and our next generation of leaders to neighboring cities that are moving faster to meet housing demand.

The path forward is clear: Fresno must embrace policies that accelerate residential development and ensure that future generations can build their futures right here at home. Ministerial approvals are a vital part of this strategy, giving homebuilders the confidence to invest while ensuring new housing meets Fresno's high standards for design, sustainability, and community benefit.

Additionally, to bolster our local economy, we encourage the City to extend ministerial approvals to job-creation projects, including industrial uses. Similar policies for both small and large-scale projects in neighboring communities are crippling Fresno's natural competitive advantage. Just as we might remove barriers to housing production, the growth of both existing and new businesses and industries is critical for local residents – providing good-paying jobs close to home, sustaining Fresno's working families, and bolstering our economic vitality.

We appreciate your time and consideration and respectfully urge the Planning Commission to approve Text Amendment Application No. P24-00794. By doing so, Fresno is taking a positive step toward creating a thriving, affordable, and economically resilient city that supports families, strengthens neighborhoods, and secures Fresno's future for generations to come.

Sincerely,



Ben Granholm
Executive Director

cc: Jerry Dyer, Mayor
Georgeanne White, City Manager
Councilmembers, City of Fresno
Planning Commission, City of Fresno

**From:** [redacted]
**To:** Adrienne Asadoorian
**Subject:** Text Amendment Application No. P24-00794
**Date:** Monday, March 10, 2025 11:35:51 AM

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**External Email:** Use caution with links and attachments

[redacted]

March 10, 2025

RE: Notice of Intent to Adopt a Mitigated Negative Declaration regarding Text Amendment P24-00794

Dear Ms. Asadoorian:

I am writing to object to the Notice of Intent to Adopt a Mitigated Negative Declaration regarding Text Amendment P24-00794 and any reconsideration of Building App. No. P21-00989 that previously failed to gain approval by the Fresno Planning Commission and the City Council for numerous problematic issues.

Regarding the proposed Mitigated Negative Declaration Application of Text Amendment P24-00794, I am concerned this amendment in large measure bypasses the numerous safeguards provided our community through the current Planning Commission project review process. The requirement for notice of proposals and notice of public hearings provides citizens of Fresno the opportunity to voice their support and/or concerns regarding any and all projects in our community. This proposal in large measure bypasses that process and thereby bypasses the community safeguards for uncontrolled and potentially hazardous building projects provided by formal Planning Commission project review.

In my Fresno district, Councilman Karbassi's District 2, the Project Review Committee, staffed by citizen volunteers, hasn't met for over a year. Loss of this preliminary review committee has already weakened citizen input into development of potentially unsafe project development in Fresno District 2. I'm hopeful not only that the proposed Text Amendment P24-00794 will be voted down, but also that the District 2 Project Review Committee will be reformed and begin meeting on a regular basis in the near future.

One example of an unsafe proposed project in District 2 is contained in Building Application No. P21-00989. Happily, that building application was denied several times by the Fresno Planning Commission and subsequently by the Fresno City Council. That proposal for an 82 unit 3 and 4 story apartment complex at Herndon Avenue and N. Prospect Avenue should not be built as initially planned for a number of significant reasons that present several potential risks and liability for future residents of the facility.

These include:

1. Building evacuation in case of fire,
2. Access to the proposed project off Prospect by the fire department,
3. Safe pedestrian pathways from the proposed project to the H. Roger Tatarian elementary school,
4. Increased traffic thru the poorly configured and too small traffic circle on Prospect, north of Herndon, and
5. Inadequate parking spaces for the proposed complex.

The developer's representative at one of the Planning Commission meetings stated that the target clientele of the proposed project would be senior citizens. Many elderly individuals have limited mobility and some seniors are easily confused when placed in stressful situations, particularly if they have mild dementia. During a building evacuation because of fire when elevator use is prohibited, many senior citizens may be unable to quickly negotiate third and fourth floor stairways to move to safety outside the buildings. In addition , the four-story portion will not have windows on the eastern side of the building thereby limiting rescue access by firefighters using ladder trucks.

N. Prospect Avenue itself is too narrow at the level of the tiny turn-around circle to accommodate a pickup truck towing a moderate-sized trailer. I question the ability of a fire ladder truck to negotiate a turn into the proposed complex especially if and when facility residents are attempting to move their vehicles to safety. These difficulties would certainly delay both fire fighter evacuations of facility residents and delay implementation of fire fighting efforts.

Despite the developer's belief that the proposed complex would be largely inhabited by senior citizens, one must assume that given its proximity to an elementary school, any number of families with children would also be residents of the complex. Safe pedestrian pathways do not exist currently between the proposed complex and H. Roger Tatarian elementary school; rather children would need to either walk along the gravel shoulder of the narrow two lane portion of N. Valentine Avenue that parallels Herndon Avenue or traverse the open field north of that side road. Placing those young children at risk from drivers hurrying to work along the already congested road seems unwise when increased traffic along N. Prospect from the proposed complex must be assumed.

The poorly designed connection of N. Valentine Avenue to Herndon Avenue, where N. Valentine becomes a frontage road that enters Prospect Avenue from the West, has already created a significant obstacle to the smooth flow of traffic from N. Valentine onto Herndon Avenue. Complicating the flow of traffic further at N. Prospect and Herndon by adding additional traffic from an 82 unit apartment complex will lead to undue congestion and innumerable fender-bender accidents along N. Prospect.

One must expect that most of the target clientele (senior citizens) of the proposed project will be moving into the apartments to "down-size" their remaining years and will have two vehicles or the residents will be working parents with two vehicles. The proposed apartment complex does not have adequate parking facilities to accommodate even 150 vehicles, much less 164 cars and trucks. Local street parking lacks the capacity to support more than a few extra vehicles.

If that building application for this parcel were to be reconsidered or reactivated, may I suggest that several changes be made to either or both the proposed complex and the surrounding street traffic infrastructure. Certainly, anticipating the numerous problems noted above and providing solutions prospectively would seem wise. I remember that the traffic signal at Marks and Herndon Avenue was constructed to replace the 4-way stop signs only after a Supervisor's teenage daughter was killed in a traffic accident at that intersection. Prospectively dealing with the above mentioned problems might save lives in the future.

I humbly suggest several potential solutions if the building application for this parcel were to be reconsidered or reactivated:

1. Down-size the proposed project to a maximum of two-story buildings
2. Move the entrance and exit from the proposed complex to W. Fir Avenue instead of N. Prospect Avenue.
3. Widen the frontage road portion of N. Valentine Avenue that parallels Herndon Avenue and add a sidewalk along the northern portion of that road and along N. Prospect Avenue while widening N. Prospect Avenue itself along with the construction of a larger traffic turning circle to N. Prospect Avenue.
4. Maintain or increase the number of parking spaces in the proposed complex despite down-sizing the number of proposed housing units themselves.

These corrective suggestions surely might be implemented by either the city or the developer of Parcel Number P24-00794 if the City of Fresno were concerned for any future residents of any development project on the aforementioned parcel of land.

In conclusion, I strenuously object to the Notice of Intent to Adopt a Mitigated Negative Declaration as a city wide code amendment and more specifically for application of any such declaration in regard to Parcel Number P24-00794 for the reasons stated above because development of the parcel per Building App. No. P21-00989 without significant corrective measures would place future resident adults and their children at significant risk of injury.

Yours Sincerely,

Virgil M. Airola

**From:** Laura Rios
**To:** Clerk Agendas; Todd Stermer
**Cc:** Alyssa Stevens; Mike Karbassi
**Subject:** FW: LOS City Council Ministerial Approval
**Date:** Wednesday, April 30, 2025 2:35:36 PM
**Attachments:** LOS City Council Ministerial Approval.pdf

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Can this be sent out to Council?

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**From:** Darren Rose [redacted]
**Sent:** Wednesday, April 30, 2025 2:33 PM
**To:** Laura Rios <Laura.Rios@fresno.gov>
**Cc:** Kristle Garton [redacted]
**Subject:** LOS City Council Ministerial Approval

**External Email:** Use caution with links and attachments

Laura,

Please see attached letter.

Darren Rose
President/ CEO
Building Industry Association of Fresno/ Madera Counties

Darren C. Rose
President & CEO
Building Industry Association of Fresno/Madera Counties
[redacted]

April 30, 2025

Fresno City Council
City Hall
2600 Fresno Street
Fresno, CA 93721

Dear Fresno City Council Members,

On behalf of the Building Industry Association of Fresno/Madera Counties, I am writing to express our strong support for ministerial approval of residential housing projects in Fresno. As our community continues to face a critical housing supply shortage, it is imperative that we take proactive steps to streamline the development process and encourage the construction of affordable and diverse housing options.

The need for additional housing in Fresno is more pressing than ever. With our population steadily increasing and the demand for quality living spaces on the rise, the current housing stock is insufficient to meet the needs of our residents. Delays in the approval process only exacerbate this issue, leading to increased costs and missed opportunities for our community. By implementing a ministerial approval process, the city can expedite housing development, allowing us to bring much-needed homes to market more swiftly.

Ministerial approval would not only facilitate faster development but also provide a clear framework for builders, ensuring that projects align with local zoning laws and community standards. This approach promotes transparency and accountability while helping to eliminate unnecessary bureaucratic hurdles. As a result, we can foster a more conducive environment for housing development that prioritizes the well-being of our residents and the growth of our community.

Furthermore, supporting residential housing projects is an investment in our future. These developments will create jobs, stimulate the local economy, and provide families with the secure and stable housing they need to thrive. Each new home built is a step toward alleviating the housing crisis and enhancing the quality of life for all Fresno residents.

In conclusion, we urge the Fresno City Council to prioritize ministerial approval for residential housing projects. This critical initiative will serve as a catalyst for addressing the housing supply

shortage, promoting economic development, and ensuring that Fresno remains a desirable place to live and work.

Thank you for your attention to this vital issue. We look forward to your leadership in fostering a thriving, sustainable future for our community.

Sincerely,

Darren C. Rose
President and CEO
Building Industry Association of Fresno/Madera Counties

11/20/24 NOTICE OF INTENTION TO ADOPT A MITIGATED NEGATIVE DECLARATION NO. 00794
BEE NOTICE V2

The above was buried in the Planning Notices on 11/20/24 (the Wednesday one week before Thanksgiving). All objections had to be submitted by December 20th.

The above does not give any indication that it is a Citywide Text Amendment or that the ministerial zoning it proposes would take away the public's right to input on proposed development in their neighborhood.

The timing and lack of information almost guaranteed their hope that no one would find out about it. It almost worked. In a city of well over half a million people only 2 managed to find out about it-us and the Sunnyside Property owners Association.

RECEIVED
2025 APR 30 P 3:47
CITY OF FRESNO
CITY CLERK'S OFFICE

At 7:07 PM on 11/20/24 an email was sent from Dennis Nard to Michael Karbassi. It read:

Michael.

Can you please tell us what this notice means? It looks like something to expedite multi-family housing on property not zoned for it.

Thank you,

Dennis Nard

At 7:47PM 11/20/24 Michael Karbassi wrote back:

Dennis,

Thank you for sharing this item. Was this something you received in the mail?

Regards,

Mike Karbassi

Dennis wrote back that this came from the Planning Department Notices today.

No further response or explanation came from Mr. Karbassi.

The next day we found out that every Council member approved this on 3//30/23. Originally it was to convert existing vacant or underutilized office space to multi-family.

A developer found out about this and wrote a letter to Jennifer Clark dated 9/27/23 just 6 months after the amendment was initiated. It appears that it took just one letter from this powerful and connected developer to get vacant parcels zoned for office use to be included in the amendment.

Right after we had been to City Hall on July 25, 2024 and prevailed against a high density housing project in our neighborhood, this text amendment went out to the various project review committees in August and September of 2024.

When we talked to Planning, we asked if this matter would be like last year and go to the Planning Commission 30-45 days after closure of comment period. We were told "no-this would be completely different, it could come up at any time. It did come up in February just as we thought it could.

It was scheduled for 2/19/25. After everyone had been notified it was rescheduled for 3/5/25.

On March 5th after the Planning Commision meeting was over, we were told the City Council meeting would be on 3/27/25. We then were noticed it was scheduled for 9:15 AM.

One person called Michael Karbassi about this and the time was changed to 5:30PM which required those working on this to notify everyone AGAIN of the time change.

Karbassi called the person back and left following message:

Hi Miss Peacock, This is Mike Karbassi returning your call. Just a heads up, the item has not been scheduled for a council meeting and probably won't be heard for several months, at least until May, possibly before the budget. When it is heard, I expect it to be heard in the evening. It make a lot of sense to me and just so you are aware the item, as it stands, I'm not in favor of ministerial approval, but should it pass against my objections, as it stands there is a specific provision on the measure that land within 500 feet of a school like an elementary school which is a sensitive use will not be included. Meaning that the lot in your neighborhood that is adjacent to Tatarian Elementary School, formally Forkner, will not be ministerially approved. That could not happen. Just one thing to have some comfort,

but again, I am against it and I expect it to be heard in the evening as well. But it will be addenda for several months. So thank you very much. If you have any questions, just give us a call back. Have a good day.

We were ready to go on March 27th (at either time). We were advised to listen in the first few minutes of the Council meeting. We listened and found out the meeting was postponed yet again to April 24th.

The Planning Director talked about having to comply with the recently passed Housing Element which was quickly passed by the Planning Commission 12/5/24 and the Council 12/12/24. Then the City Manager threatened the City Council with what the State could do to it if they didn't go along with the plan and the financial consequences to the City. The State and the City are both running huge deficits. The State's money comes from taxpayers. The

City Council members are elected to represent us, the taxpayers, and hopefully what is best for the City, its citizens, and the future. This performance looked staged and we felt that it was planned since we were not there able to discuss it.

This was confirmed when a neighbor contacted one of Mr. Karbassi's contacts to inform him of the change and he said he already knew because Karbassi called him "last night". This would have been nice for the neighbors who had to contact everyone about this short notice (same day) change to know.

Mr. Karbassi was on record saying the new council person could not be sworn in until at least April 10th, so we assumed this was why he wanted the date changed. The meeting was then scheduled for 4//24/25 at 5:30pm. We were fine with this and ready to go.

We then inadvertently found out that Nick Richardson was out of the country for several weeks on for reserve military duty.

On Good Friday afternoon, slightly after 3:00pm, we received an email from the Planning Department stating the meeting had been moved to May 1st a 5:30pm. So again on Easter weekend we had to notify all of our people of the change. No reason or explanation was given. We verified that Nick Richardson would still be on military duty until May 4th. Many of the properties in question are in his district.

At this point Dennis Nard and Paula Moradian asked Karbassi as Council President to reschedule this to allow Mr. Richardson to participate in the hearing.

He replied "The Council considered this. After some debate decided that they would not postpone city business due to the absence of Councilmember Richardson, regardless of the reason. While I do not agree with their decision, the Council majority has set a precedent, and it is unlikely that they will change their collective opinion. Unless you hear otherwise from City Staff, I expect this item to be heard as scheduled on 5/1/25".

This is outrageous on several levels!

First there is no project connected to this text amendment and there has been no sense of urgency since the meeting process started.

Second, City business could be postponed to allow a new member to be sworn in, but we can't for a council person serving our country on military duty?

This matter has been changed 3 times and postponed by over a month-why?

Third, Councilmember Richardson is serving his country with required military service. He should not be punished for this and denied he right to represent his constituents and the City, especially on an issue as important as the people's freedom and right to speak and have input on their own neighborhoods.

Next the Review Committees had all met by mid-September, yet there was no rush to drop this 350 page document on the public until mid-November. If this wasn't going on calendar until May why drop it on the public during the holidays. Because the City hoped no one would

see it and they could just say it was legally posted on the City site and the Fresno Bee.

We have been notifying people and preparing for meetings since March, 2024, 2 weeks after the elections last year. We finally did prevail on a high density project at the council meeting on July 25, 2024. That project is in litigation and has not been resolved to our knowledge.

After only 3 ½ months of not having to react to deadlines and meetings, all at the pleasure of the City and developers, Planning comes at us again during the holidays—with even higher density housing in an area not planned for it, no resources to handle it, and a ministerial zoning proposal to take away our right to participate in the development process.

On the previous development we were called to a meeting with the previous City Manager and then lectured by him in an abusive manner.

He made very politically incorrect comments about midgets, which certainly would have earned our collective body an abusive lecture if even one person had made such comments.

We have been threatened by city officials who finds it easier to threaten us, than to stand up to the State of California policies that they want to hide behind.

Right after we prevailed at the City Council meeting last year we went to the Planning Department to sign up to receive the Planning notices. It took 3 tries but we finally were put on the list. The last time as my husband was at the City Attorney's office, I was sitting there and as I was sitting there I watched the developer and property owners for the project that had just gone to the City Council come out with the Planning Director, Jennifer Clark.

There are certified letters that were written asking Planning, Traffic, and Public Works people to come out and view the traffic issues and congestion associated with this proposed project. The best we could get was a meeting at City Hall where we (as usual) were outnumbered by city employees by at least two to one. Scott Mozier was at least cordial to us. The rest were clearly not happy to have to actually sit down with us.

SO we have learned that after jumping through all of the hoops, repeatedly gathering large groups, and finally prevailing will get you nothing except time away from your family, stress, and exhaustion. This is exactly what the developers and the elected and unelected bureaucrats want. They will enjoy their holidays and free time and either ignore you, veto any victory, or just come at you again with the same proposal or something worse.

This is not unique to our neighborhood. This is how the City operates. It is happening in many parts of the city to very good and productive people who seem to be the most reviled people by our current city and state government.

Our objections in November stated that we had already prevailed on this matter in our neighborhood despite the secretive, abusive, and uneven playing ground.

They say "you can't fight City Hall" and in Fresno that seems too often the case.

We would like an even playing ground and the same respect and consideration granted to developers.

Respectfully submitted:

Debbie Ward

**CITY OF FRESNO**
**PLANNING AND DEVELOPMENT DEPARTMENT**

# NOTICE OF PUBLIC HEARING

**TEXT AMENDMENT APPLICATION NO. P24-00794**
**AND**
**MITIGATED NEGATIVE DECLARATION (SCH NO. 2024110662)**

NOTICE IS HEREBY GIVEN that the Fresno City Council, in accordance with Sections 15-4902, 15-4903, 15-5809 and 15-5810 of the Fresno Municipal Code and in accordance with the procedures of Article 50, Chapter 15, of the Fresno Municipal Code, will conduct a public hearing to consider the items below, filed by the City of Fresno. At the hearing, the following will be considered:

1. **Mitigated Negative Declaration Sch No. 2024110662:** In accordance with the California Environmental Quality Act (CEQA), a Mitigated Negative Declaration (MND) was prepared by the City to consider potential impacts associated with implementation of the project, and to provide mitigation measures that would reduce impacts to less than significant levels. The Draft MND was released for a 30-day public review period beginning on November 20, 2024 and ending on December 20, 2024.
2. **Text Amendment Application No. P24-00794** consideration of a citywide text amendment that would amend Sections 15-1302, 15-4907, 15-5102, 15-6702, 15-6802 of the Fresno Municipal Code, repeal Section 15-1106 of the Fresno Municipal Code, and establish Section 15-2742.5 of the Fresno Municipal Code, to permit ministerial approval of housing projects in the following instances as noted below:
    a. Ministerial approval of office to dwelling conversions in the Office zone district; and
    b. Ministerial approval of multi-unit residential development in the RM-1, RM-2, and RM-3 zone districts on parcels within one-half mile of an existing bus stop; and
    c. Ministerial approval of multi-unit residential uses in the NMX, CMX, RMX, CMS and CR zone districts on parcels within the City's Infill Priority Area; and
    d. Ministerial approval of new multi-unit residential development in the Office zone district.

*The above documents are available for public review via e-mail (noted below) and within the upcoming City Council agenda. Please contact the Planner identified below or visit the webpage www.fresno.gov/P24-00794 for additional information.

***FRESNO CITY COUNCIL***

Date: Thursday, March 27, 2025

Time: 9:15 a.m., or thereafter

Place: City Hall Council Chamber, Second Floor, 2600 Fresno Street, Fresno, CA 93721; or watch the live broadcast via the Zoom link located on the City Council agenda found here: https://fresno.legistar.com/Calendar.aspx

Any interested person may appear at the public hearing and present written testimony, or speak in favor or against the project proposal. However, all documents submitted to the City Council for its consideration shall be submitted to the City Clerk at least 24 hours prior to the Council Agenda item being heard, pursuant to the City Council's meeting rules and procedures, or they may be excluded from the administrative record of proceedings. If an individual challenges the above applications in court, they may be limited to raising only those issues that were raised at the public hearing described in this notice, or in written correspondence delivered to the Development Services Division of the Planning and Development Department and/or City Council consistent with their respective rules of procedure at, or prior to, the public hearing.

NOTE: This public hearing notice is being published in the Fresno Bee pursuant to the requirements of Fresno Municipal Code Section 15-5007.

For additional information regarding this project, contact Adrienne Asadoorian-Gilbert, Supervising Planner, Planning and Development Department, 2600 Fresno Street, Fresno, California 93721-3604, by phone at (559) 621-8339 or via e-mail at Adrienne.Asadoorian@fresno.gov. *Si necesita información en Español, comuníquese con Yamilex Nava al teléfono (559) 621-8028 o por correo electrónico a Yamilex.Nava@fresno.gov.*

The plain map will show that Brawley is a short and extremely busy feeder street. It is the feeder street into the entire east side of Sierra Sky Park, the Beechwood Apartments, United Health Centers (200 employees) and the garden homes along Beechwood to the west. Going north, Brawley is the main feeder into San Joaquin Estates II, as most of the residents no longer use Prospect. It also carries many people to the garden homes across the street from the existing offices, the school and the vacant lots when they are developed. The map also shows Prospect, which feeds into

the roundabout and way down to the frontage road which is called Valentine. It it difficult to access Prospect when cars are already in the intersection or coming around the roundabout. The homes along Beechwood and Fir are already burdened with heavy traffic and street parking from the school. Again the property on Prospect and Fir has already been zoned for high density multi-family. The properties covered by the amendment have applied for RS-5 zoning


Country Club
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W Bluff Ave
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N Hazel Ave
W Minarets Ave
W Chennault Ave
W La Costa Ave
W Birch Ave
N Dewey Ave
N Knoll Ave
W Alluvial Ave
N Gentry Ave
W Spruce Ave
W Spruce Ave
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W Locust Ave
W Fir Ave
N Brawley Ave
W Fir Ave
W Beechwood Ave
W Herndon Ave
W Herndon Ave
W Herndon Ave
Sierra Sky Park Airport
W Alluvial Ave
N McCambell Cir
W Kelly Ave
W Chennault Ave
N Blythe Ave
N Doolittle Dr
W Vandegrift Ave
W Spaatz Ave
Beechwood Apartments
H. Roger Tatarian Elementary School
Fancy Nails & Spa
Mad Duck Craft Brewing Northwest
ARCO
Brighten Academy Preschool Sky Park
Freedman Law
Enchanted Fairies of Fresno, CA
Dutch Bros Coffee
B Fischer MD

| | |
|---|---|
| **From:** | Jovana Morales-Tilgren |
| **To:** | Laura Rios; Clerk |
| **Cc:** | Miguel Arias; Karla Martinez-Arias; Tyler Maxwell; Nelson Esparza; Annalisa Perea; Mike Karbassi; Nicole DeMera; Emma De La Rosa |
| **Subject:** | Fresno Housing Streamlining Ordinance |
| **Date:** | Wednesday, April 30, 2025 4:53:49 PM |
| **Attachments:** | 05.01.2025.CL.docx.pdf |

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**External Email:** Use caution with links and attachments

Hello,

We are attaching this comment letter for item ID 25-597. Consideration of Text Amendment Application No. P24-00794 and related Environmental Finding for Environmental Assessment No. P24-00794, amending Sections 15-1302, 15-4907, 15-5102, 15-6702, 15-6802 of the Fresno Municipal Code, repealing Section 15-1106 of the Fresno Municipal Code, and establishing Section 15-2742.5 of the Fresno Municipal Code.

Thank you.

Best,

**Jovana Morales Tilgren, MA | *Housing & Land Use Policy Manager***
**Leadership Counsel for Justice and Accountability**
[redacted]
**Pronouns: She/Her/Ella**

April 30, 2025

Fresno City Council
2600 Fresno Street
Fresno, CA 93721

***Subject: Support if Amend, Fresno Housing Streamlining Ordinance (Development Code Text Amendment No. P24-00794)***

Dear Members of the Fresno City Council,

On behalf of the undersigned organizations below, we are writing to express our support if additional amendments are included in the proposed Fresno Housing Streamlining Ordinance, also known as Development Code Text Amendment No. P24-00794. In order for the City's Housing Element to be found compliant and in adherence to affirmatively furthering fair housing (AFFH) by the California Department of Housing and Community Development (HCD), Program 2– Variety of Housing Opportunities in High Resource Areas, was included.

The adopted Housing Element includes Program 2 that states, "the City will present potential sites or rezoning options for land in high and relatively higher resource and income areas, including RCAAs, for Council consideration to provide opportunities for higher density development in all areas of the city and reduce concentrations of poverty." To ensure the implementation of Program 2 facilitates the development of high density housing in areas of high opportunity, and does not inadvertently oversaturate Racial and Ethnic Concentrated Areas of Poverty (R/ECAPs) with high density housing developments, we recommend edits to the proposed text amendments as well as including a complementary zoning ordinance. Our recommendations aim to support the City's duty to affirmatively further fair housing by preventing the overconcentration of affordable housing in R/ECAPs and preventing the ministerial approval of housing near polluting sources. Our recommendations are underlined.

[SECTION 15-2742.5 – OFFICE-TO-DWELLING CONVERSION.
D. Definitions.

1. "Eligible Office" shall be defined as an existing office building(s) located in the O District <u>which does not abut heavy or light industrial zones, polluting sources, or major state highways.</u>

[(E.) Additional Housing Streamlining

2. Exceptions
1. Permitted Uses. The following types of projects shall be permitted with a Zone Clearance if the additional standards within the section are met:
…
c. Multi-unit residential development in the RM-1, RM-2, and RM-3 Districts on parcels that are within ½ mile of an existing bus stop, and at least 1000 ft from a polluting source, light industrial and heavy industrial zones, and major state highways

d. Multi-unit residential uses in NMX, CMX, RMX, CMS, and CR Districts on parcels within the City's Infill Priority Area, and at least 1000 ft from a polluting source, light industrial and heavy industrial zones, and major state highways

c. New residential development is prohibited on vacant or underutilized parcels located in the Office Zone district within 1000 feet from a polluting source, light industrial and heavy industrial zones, and major state highways

Additionally, in order to ensure affordable housing is equitably distributed throughout the City, not just in low resourced areas, we strongly recommend additional measures added by including a complementary inclusionary zoning ordinance. There are no mitigation measures to ensure that affordable housing will be built in high resourced areas or racially concentrated affluent areas (RCAAs), therefore inclusionary zoning will provide the ability to set aside affordable units if market rate housing is built in high resourced areas. This is a crucial step toward addressing Fresno's pressing housing needs, improving the efficiency and accessibility of housing development throughout the City, and remaining in compliance with Housing Element law.

**Elm Avenue Rezone**

Throughout the last few years, the City has received requests from developers to rezone a number of sites on Elm Avenue located in Southwest Fresno. The proposed rezone sites are currently zoned Neighborhood Mixed Use (NMX) which provides 3,540 housing sites. The City has clearly stated the need to replace the 3,540 sites at the same time the proposed rezone is considered. In approving the text amendment to allow office to residential conversions, the City will be adding land capacity for housing, perhaps more or just enough to replace the 3,540 sites at risk of being lost through the Elm Avenue rezone. While we support the implementation of program 2, we continue to oppose the Elm Avenue proposed rezone and condemn any actions by the City to approve the text amendment to undermine the Southwest Fresno Specific Plan and

community's desire to maintain the Elm Avenue sites as NMX. The City's duty to affirmatively further fair housing must also be upheld in land use decisions to prevent the same patterns of segregation, disinvestment, and concentration of polluting sources in low income and low income communities of color. Specifically, the City must incorporate AFFH into land use and funding decisions beginning in January of 2025.[1] The City must analyze project alternatives and recommend the option that will AFFH to council.

Additionally, the City must adhere to the Housing Crisis Act, Government Code 66300.5 and 66300.6. and Program 35– Replacement Units. The City must ensure that the standards the City is applying for both ministerial and discretionary approvals complies with these requirements where new development is happening on sites that have existing housing units or had housing units in the recent past.

As a reminder, this housing streamlining ordinance is included in the City's adopted Housing Element, HCD may review a jurisdiction's failure to implement a housing element program or any action it takes that is inconsistent with the housing element. If HCD finds that the locality's actions do not substantially comply with the Housing Element Law it may revoke any previous findings that the housing element is in compliance with the law, and it may notify the Attorney General that the City is in violation of the law. (§ 65585(i) & (j).)

We strongly urge the City to incorporate measures to ensure equitable distribution of affordable housing particularly in high resource areas and we appreciate the City of Fresno for taking meaningful steps to promote housing affordability and choice while enhancing the quality of life for current and future residents.

Sincerely,

Jovana Morales Tilgren
Housing & Land Use Policy Manager
Leadership Counsel for Justice and Accountability

Marisa Moraza
Political Director
Power California

Dez Martinez
Chief Executive Officer

---

[1] FRESNO MULTI-JURISDICTIONAL HOUSING ELEMENT | DECEMBER 2024. Pg 1E-1-11. https://fresnomjhe.com/wp-content/uploads/2025/01/FresnoHE_AdptdHE_12.12.24.pdf

# We Are Not Invisible

Dez Martinez
Fresno Homeless Union

# Regular Council Meeting

## May 1, 2025

# FRESNO CITY COUNCIL

City of FRESNO

## Public Comment Packet

RECEIVED
2025 APR 30 P 12:01
CITY OF FRESNO
CLERK'S OFFICE

**ITEM(S)**

**5:30 P.M. (ID 25-597)**

Consideration of Text Amendment Application No. P24-00794 and related Environmental Finding for Environmental Assessment No. P24-00794, amending Sections 15-1302, 15-4907, 15-5102, 15-6702, 15-6802 of the Fresno Municipal Code, repealing Section 15-1106 of the Fresno Municipal Code, and establishing Section 15-2742.5 of the Fresno Municipal Code, to permit ministerial approval of housing projects.

[TITLE TRUNCATED FOR SUPPLEMENTAL PACKET COVER PAGE]

**Contents of Supplement:** Public Comment Received

**Supplemental Information:**

Any agenda related public documents received and distributed to a majority of the City Council after the Agenda Packet is printed are included in Supplemental Packets. Supplemental Packets are produced as needed. The Supplemental Packet is available for public inspection in the City Clerk's Office, 2600 Fresno Street, during normal business hours (main location pursuant to the Brown Act, G.C. 54957.5(2). In addition, Supplemental Packets are available for public review at the City Council meeting in the City Council Chambers, 2600 Fresno Street. Supplemental Packets are also available on-line on the City Clerk's website.

**Americans with Disabilities Act (ADA):**

The meeting room is accessible to the physically disabled, and the services of a translator can be made available. Requests for additional accommodations for the disabled, sign language interpreters, assistive listening devices, or translators should be made one week prior to the meeting. Please call City Clerk's Office at 621-7650. Please keep the doorways, aisles and wheelchair seating areas open and accessible. If you need assistance with seating because of a disability, please see Security.

**From:** [redacted]
**To:**
**Subject:** UPholdings Letter of Support - Streamlining Ordinance
**Date:** Friday, April 25, 2025 1:31:23 PM
**Attachments:** image001.png
UPholdings Letter of Support.pdf

---

**External Email:** Use caution with links and attachments

Good Afternoon,

On behalf of UPholdings, attached is a letter of support for the Streamlining Ordinance to be discussed next Thursday, May 1st.

Best,
Sarah

UPHOLDINGS

Sarah Ritten
Associate Project Manager
[redacted]
w: upholdings.net

**Statement of Confidentiality**
This message contains confidential information and is intended only for the individual named. If you are not the named addressee you should not disseminate, distribute or copy this email. Please notify the sender immediately by email if you have received this email by mistake and delete this email from your system. Email transmission cannot be guaranteed to be secure or error-free as information could be intercepted, corrupted, lost, destroyed, arrive late or incomplete, or contain viruses. The sender therefore does not accept liability for any errors or omissions in the contents of this message, which arise as a result of email transmission. If verification is required please request a hard-copy version.
UPHOLDINGS - [redacted] Lincolnwood, IL 60712

UPHOLDINGS

April 25, 2025
Fresno City Council
2600 Fresno Street
Fresno, CA 93721

***Subject: Support for Fresno Housing Streamlining Ordinance (Development Code Text Amendment No. P24-00794)***

Dear Members of the Fresno City Council,

On behalf of UPholdings, I am writing to express our strong support for the proposed Fresno Housing Streamlining Ordinance, also known as Development Code Text Amendment No. P24-00794. This forward-thinking initiative is a crucial step toward addressing Fresno's pressing housing needs and improving the efficiency and accessibility of housing development throughout our city.

The ordinance offers a strategic, equitable approach to increasing housing availability by streamlining the development process for a diverse range of housing types. We are especially encouraged by the ordinance's key components, including:

- Ministerial approval for office-to-residential conversions, unlocking underutilized space and creating approximately 2,692 new units over 30 years.
- Facilitating housing near public transit, supporting sustainability and accessibility with up to 5,525 potential new units.
- Streamlined infill development in mixed-use zones, providing the opportunity for 12,032 additional homes while preserving open space and enhancing urban vitality.
- New residential opportunities on office-zoned parcels, contributing approximately 2,176 new units and promoting efficient land use.

These provisions align with the broader goal of promoting equitable, affordable, and sustainable housing for all Fresno residents. We also commend the ordinance's thoughtful inclusion of traffic and community safety measures for larger projects, as well as its potential to foster economic revitalization and social inclusivity.

We commend the City of Fresno for taking meaningful steps to promote housing affordability and choice while enhancing the quality of life for current and future residents. We urge you to adopt the Fresno Housing Streamlining Ordinance before you on May 1st, 2025.

Sincerely,

[redacted]

Jessica Hoff Berzac
President, UPholdings

**From:** [redacted]

**Subject:** Support for Fresno Housing Streamlining Ordinance (Development Code Text Amendment No. P24-00794)
**Date:** Sunday, April 27, 2025 9:54:10 AM
**Attachments:** RCI-BBCDC LOS for Fresno Housing Streamlining Ordinance (Development Code Text Amendment No. P24-00794).pdf

---

**External Email:** Use caution with links and attachments

Dear Fresno City Clerk,

Please include the attached letter of support from Regenerate California Innovation and Better Blackstone Community Development Corporation for the Fresno Housing Streamlining Ordinance (Development Code Text Amendment No. P24-00794) in the City Council agenda packet for this item's public hearing now scheduled for May 1, 2025.

Thank you.

Keith Bergthold
RCI, CEO
[redacted] (office)

Regenerate California Innovation Inc. (RCI)
[redacted] | Fresno, CA 93704

April 28, 2024

Fresno City Council
2600 Fresno Street
Fresno, CA 93721

Attn: Fresno City Clerk's Office at clerk@fresno.gov

***Subject: Support for Fresno Housing Streamlining Ordinance (Development Code Text Amendment No. P24-00794)***

Dear Members of the Fresno City Council,

On behalf of Regenerate California Innovation and Better Blackstone Community Development Corporation, I am writing to express our strong support for the proposed Fresno Housing Streamlining Ordinance, also known as Development Code Text Amendment No. P24-00794. This forward-thinking initiative is a crucial step toward addressing Fresno's pressing housing needs and improving the efficiency and accessibility of housing development throughout our city.

The ordinance offers a strategic, equitable approach to increasing housing availability by streamlining the development process for a diverse range of housing types. We are especially encouraged by the ordinance's key components and impacts, including:

- Providing an additional tool for implementing the City of Fresno's Housing Element and the State of California's Housing Accountability Act.
- Ministerial approval for office-to-residential conversions, unlocking underutilized space and creating approximately 2,692 new units over 30 years.
- Facilitating housing near public transit, supporting sustainability and accessibility with up to 5,525 potential new units.

- Streamlined infill development in mixed-use zones, providing the opportunity for 12,032 additional homes while preserving open space and enhancing urban vitality.
- New residential opportunities on office-zoned parcels, contributing approximately 2,176 new units and promoting efficient land use.

These provisions align with the broader goal of promoting equitable, affordable, and sustainable housing for all Fresno residents. We also commend the ordinance's thoughtful inclusion of traffic and community safety measures for larger projects, as well as its potential to foster economic revitalization and social inclusivity.

Regenerate California Innovation and Better Blackstone Community Development Corporation commend the City of Fresno for taking meaningful steps to promote housing affordability and choice while enhancing the quality of life for current and future residents.

We urge you to adopt the Fresno Housing Streamlining Ordinance now scheduled before you on May 1, 2025.

Sincerely,



Keith Bergthold, CEO

Regenerate California Innovation, Inc (RCI) and Better Blackstone Community Development Corporation (BBCDC)

**From:** [redacted]
**To:** [redacted]
**Subject:** Letter in support of housing text amendment
**Date:** Sunday, April 27, 2025 3:00:07 PM
**Attachments:** City of Fresno Infill housing support letter Chinatown.pdf

---

**External Email:** Use caution with links and attachments

Please find attached a letter from the Chinatown Fresno Foundation in support of a text amendment that will benefit the neighborhood housing initiatives for City Council members.

Thank you.

Jan

Jan Minami
Project Director, Chinatown Fresno Foundation
[redacted]

[redacted] resno CA 93706

BOARD OF DIRECTORS

**Cami Cipolla**, Chair
Director of Education, Fresno Historical Society

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Owner, YoshiWORLD!

**Natalie Vargas**, Secretary
Owner, Heavens Healing

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Branch Manager & VP, U. S. Bank

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La Elegante family

**Augie Blancas**
California High-Speed Rail Authority

**Morgan Doizaki**
Owner, Central Fish and properties along Kern Street and China Alley

**Es Esposo**
Owner, Dick's Building and Basque Hotel

**Tom Freund**
Owner, Property at Inyo and G Streets

**Ben Gitmed**
Owner, Komoto's Building

**Yem Huynh**
Owner, Dick's Building

**Eduardo Lopez**
Owner, Property at Tulare and E Streets

**June Stanfield**
Owner, Golden Cuts Barbershop and Salon

**Christina Stokes-Johnson**
Director of Real Estate Development, Fresno Housing Authority

April 27, 2025

Fresno City Council
2600 Fresno Street
Fresno, CA 93721

**Subject: Support for Fresno Housing Streamlining Ordinance (Development Code Text Amendment No. P24-00794)**

Dear Members of the Fresno City Council,

On behalf of the Chinatown Fresno Foundation, I urge you to approve the proposed Fresno Housing Streamlining Ordinance, also known as Development Code Text Amendment No. P24-00794. This initiative is a crucial step toward addressing Fresno's pressing housing needs and improving the efficiency and accessibility of housing development throughout our city. We are strongly in support.

The Chinatown Fresno area is primarily a commercial district located west of core Downtown. Residential housing exists, but more is needed. The proposed text amendment would simplify the development process, removing workflow challenges, especially for infill development. We feel this will jumpstart Chinatown housing development.

In our revitalization efforts, development obstacles are frequently a roadblock for property owners. The revisions in the proposed ordinance are welcome improvements for them.

The ordinance offers a strategic, equitable approach to increasing housing availability by streamlining the development process for a diverse range of housing types. We are especially encouraged these key components of the ordinance:

- Facilitating housing near public transit, supporting sustainability and accessibility within Chinatown
- Streamlined infill development in mixed-use zones like Chinatown, expanding built housing while preserving open space and enhancing urban vitality.

These provisions align with the broader goal of promoting equitable, affordable, and sustainable housing for all Fresno residents. We also commend the ordinance's thoughtful inclusion of traffic and community safety measures for larger projects, as well as its potential to foster economic revitalization and social inclusivity.

We commend the City of Fresno for taking meaningful steps to promote housing affordability and choice while enhancing the quality of life for current and future residents. We urge you to adopt the Fresno Housing Streamlining Ordinance before you this Thursday, May 1, 2025.

Sincerely,

[redacted]
Jan Minami, Project Director

**From:** [redacted]
**To:**
**Cc:**
**Subject:** Letter of Support - Fresno Housing Streamlining Ordinance
**Date:** Monday, April 28, 2025 11:12:13 AM
**Attachments:** Letter of Support - Fresno Housing Streamline Ordinance.pdf

---

**External Email:** Use caution with links and attachments

Good morning,

Please find attached our letter of support for the Fresno Housing Streamlining Ordinance.

Thank you,
Fernando

**Fernando Alvarez**
**Government Affairs Specialist**
Fresno Chamber of Commerce
[redacted] Fresno, CA 93721
[redacted]

**April 28, 2025**
Fresno City Council
2600 Fresno Street
Fresno, CA 93721

**Subject: Support for Fresno Housing Streamlining Ordinance (Development Code Text Amendment No. P24-00794)**

Dear Members of the Fresno City Council,

On behalf of the Fresno Chamber of Commerce, I am writing to express our strong support for the proposed Fresno Housing Streamlining Ordinance, also known as Development Code Text Amendment No. P24-00794. This ordinance is a timely and strategic step toward meeting Fresno's growing housing demand while encouraging infill development and efficient land use across our city.

We are particularly supportive of the ordinance's efforts to reduce regulatory barriers and accelerate the production of diverse housing types. Key components of the ordinance include:

- Ministerial approval for office-to-residential conversions, creating opportunities for approximately 2,692 new units by repurposing underutilized buildings.
- Facilitating housing near public transit, potentially adding 5,525 new units while promoting sustainability and accessibility.
- Streamlined infill residential development in mixed-use zones, contributing up to 12,032 additional homes in urban core areas and helping preserve open space and agricultural land.
- New housing opportunities on office-zoned parcels, unlocking roughly 2,176 units and enhancing flexibility in how our land is used to meet community needs.

These provisions not only help meet the housing targets outlined in the City's Housing Element but also complement the Chamber's goals of supporting economic vitality, revitalizing underused commercial areas, and strengthening the local workforce through greater housing access.

We also appreciate the ordinance's inclusion of traffic safety and infrastructure considerations for larger projects, ensuring that growth is both proactive and responsible.

The Fresno Chamber of Commerce encourages the Council to adopt this ordinance and continue leading on housing solutions that will support our city's long-term growth and prosperity.

Sincerely,

[redacted]

Scott Miller
President and CEO
Fresno Chamber of Commerce

**From:** [redacted]
**To:** [redacted]
**Subject:** Letter of Support for the Fresno Housing Streamlining Ordinance
**Date:** Monday, April 28, 2025 11:29:48 AM
**Attachments:** image001.png
Letter of Support for Fresno Housing Streamlining Ordinance.pdf

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**External Email:** Use caution with links and attachments

Dear City Clerk,

Attached is a letter of Letter of Support for the Fresno Housing Streamlining Ordinance. I would like to have this letter included in the record.

Thank you for your assistance.

FRESNO VIBRANT COMMUNITIES QUALITY HOUSING HOUSING ENGAGED RESIDENTS

Tyrone Roderick Williams
Chief Executive Officer
[redacted]

April 28, 2024

Fresno City Council
2600 Fresno Street
Fresno, CA 93721

***Subject: Support for Fresno Housing Streamlining Ordinance (Development Code Text Amendment No. P24-00794)***

Dear Members of the Fresno City Council,

On behalf of Fresno Housing, I am writing to express our strong support for the proposed Fresno Housing Streamlining Ordinance, also known as Development Code Text Amendment No. P24-00794. This forward-thinking initiative is a crucial step toward addressing Fresno's pressing housing needs and improving the efficiency and accessibility of housing development throughout our city.

The ordinance offers a strategic, equitable approach to increasing housing availability by streamlining the development process for a diverse range of housing types. We are especially encouraged by the ordinance's key components, including:

- Ministerial approval for office-to-residential conversions, unlocking underutilized space and creating approximately 2,692 new units over 30 years.
- Facilitating housing near public transit, supporting sustainability and accessibility with up to 5,525 potential new units.
- Streamlined infill development in mixed-use zones, providing the opportunity for 12,032 additional homes while preserving open space and enhancing urban vitality.
- New residential opportunities on office-zoned parcels, contributing approximately 2,176 new units and promoting efficient land use.

These provisions align with the broader goal of promoting equitable, affordable, and sustainable housing for all Fresno residents. We also commend the ordinance's thoughtful inclusion of traffic and community safety measures for larger projects, as well as its potential to foster economic revitalization and social inclusivity.

I commend the City of Fresno for taking meaningful steps to promote housing affordability and choice while enhancing the quality of life for current and future residents. We urge you to adopt the Fresno Housing Streamlining Ordinance before you on Thursday, May 1, 2025

Sincerely,

[redacted]

Tyrone Roderick Williams
CEO Fresno Housing

**From:** [redacted]
**To:** [redacted]
**Cc:** [redacted]
**Subject:** Ministerial Slam
**Date:** Saturday, April 26, 2025 4:42:24 PM

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**External Email:** Use caution with links and attachments

**Via E-mail** [redacted] **April 26, 2025**


**William D. Stevens**

[redacted]


Re: City of Fresno
Planning and Development Department
Text Amend. App No. P24-00794
Mitigated Neg. Dec. SCH No. 2024110662

Attention: Ms. Adrienne Asadoorian-Gilbert

This is an Addendum to the former email as noted above, dated March 3, 2025, and copied below. I will add comments to the Addendum that will be highlighted in **BOLD**. Please distribute to the City Council Members.

5:30 P.M. (CONTINUED TO MAY 1, 2025, AT 5:30 P.M.)
ID 25-472
Sponsors: City of Fresno Consideration of Text Amendment Application No. P24-00794 and related Environmental Finding for Environmental Assessment No. P24-00794, amending Sections 15-1302, 15-4907, 15-5102, 15-6702, 15-6802 of the Fresno Municipal Code, repealing Section 15-1106 of the Fresno Municipal Code, and establishing Section 15-2742.5 of the Fresno Municipal Code, to permit ministerial approval of housing projects.

1. ADOPTION of Mitigated Negative Declaration Sch No. 2024110662 for Text Amendment Application No. P24-00794.

2. BILL (for introduction), amending Sections 15-1302, 15 4907, 15-5102, 15-6702, 15-6802 of the Fresno Municipal Code, repealing Section 15-1106 of the Fresno Municipal Code, and establishing Section 15-2742.5 of the Fresno Municipal Code, to permit ministerial approval of housing projects in the following instances as noted below: **Please note former letter below this amendment.**

a. Ministerial approval of office to dwelling conversions in the Office zone district; and; **This will be a complete change in land use as designated on the Official General Plan Land Use and Circulation Map.**

b. Ministerial approval of multi-unit residential development in the RM-1, RM-2, and the RM-3 zone districts on parcels within one-half mile of an existing bus stop; and; **The City can place a Bus Stop at will. Note NE corner of Barstow and Van Ness. Bus stop sign placed on a formal Stop Sign.**

c. Ministerial approval of multi-unit residential uses in the NMX, CMX, RMX, CMS and CR zone districts on parcels within the City's Infill Priority Area; and; **This will be a complete change in land use as designated on the Official General Plan Land Use and Circulation Map.**

d. Ministerial approval of new multi-unit residential development in the Office zone district. **This will be a complete change in land use as designated on the Official General Plan Land Use and Circulation Map.**

**Via E-mail [redacted] March 03, 2025**

**William D. Stevens**

[redacted]

Re: City of Fresno
Planning and Development Department
Text Amend. App No. P24-00794
Mitigated Neg. Dec. SCH No. 2024110662

Attention: Ms. Adrienne Asadoorian-Gilbert

This is a pure and simple power play on the part of the City of Fresno. The premise is

to give ministerial approval power to deviate from existing land uses supported by zoning districts with minimal to no knowledge of said change by the Community. The Planning Director's total disrespect to the Communities Representatives is reflected in her "word salad" explanations and examples. We do not need more DEI (Director's Empowerment Initiatives) in the Planning Department. Let us outline the players involved in the power play and keep it simple:

1. Community Servants paid by taxes (Mayor to Trash Collector).
2. Community Land Owners are the Taxpayers (Rentals, Owners, Landlords).
3. City Council (People in place to represent the Community Land Owners).

**Setting:**

1. Caterer
2. Host
3. Party Coordinator

The Host hires a Party Coordinator to coordinate all aspects of the Party to the Host's best interests. The Host hires a Caterer to provide all nourishment based on the Host's desire, as stated in the Contract (City Zoning and Land Use Plan).

The Host agrees to the Contract, signs it and asks the Party Coordinator to oversee the Contract to make sure it is followed through.

To make a long story shorter: the Caterer decides to do a CHANGE UP on the food and services that are nowhere close to what is in the Contract.

This CHANGE UP is supposedly based on outside influence (State Government, Developers and Friends) and is not his fault. He is now asking the Coordinator to revise the signed Contract. The Caterer is saying that they will not service the Contract AS IS.

The Host of the Party is saying "NO to the revisions to the Contract." They are paying for the Contract AS IS. It is the duty of the Party Coordinator to say "NO TO THE REVISIONS." The Caterer will service the Contract AS IS on behalf of the Host. The power play by the Caterer will not happen.

I respectfully request that the City Council DENY the power play by the City of Fresno on behalf of the people who pay their wages.

Sincerely,

William D. Stevens

1972 Bachelor of Architecure

1979 Registered Architect, California
1981 NCARB Certificate

**Please confirm receipt by return e-mail.**

**From:** [redacted]
**To:**
**Subject:** Support for Fresno Housing Streamlining Ordinance (Development Code Text Amendment No. P24-00794)
**Date:** Wednesday, April 30, 2025 10:24:33 AM
**Attachments:** City Of Fresno Housing Supoort Letter 4.2025.pdf

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**External Email:** Use caution with links and attachments

Dear Fresno City Clerk,

Please include the attached letter of support from Highway City Community Development, Inc. for the Fresno Housing Streamlining Ordinance (Development Code Text Amendment No. P24-00794) in the City Council agenda packet for this item's public hearing now scheduled for May 1, 2025.

Thank you.

--
***April Henry***
Executive Director/CEO
Highway City Community Development, Inc - *a local, place-based nonprofit*
Teague Community Resource Center - a "HUB" of resources, services & events for our community! [redacted]

[redacted]
**Information:** [redacted] or find us on Facebook

*Helping People Help Themselves*
**"A failure's only a fail when you don't take the lesson and learn from it..."**

April 28, 2024

Fresno City Council
2600 Fresno Street Fresno, CA 93721

Attn: Fresno City Clerk's Office at clerk@fresno.gov
Subject: Support for Fresno Housing Streamlining Ordinance (Development Code Text Amendment No. P24-00794)
Dear Members of the Fresno City Council,
On behalf of *Highway City Community Development, Inc.*, I am writing to convey our support for the **Fresno Housing Streamlining Ordinance (Development Code Text Amendment No. P24-00794)**. As a community-based organization rooted in the heart of West Fresno, we witness daily the urgent need for more accessible, affordable, and diverse housing options for families across our city.
This ordinance represents a practical and forward-looking solution to many of the longstanding housing challenges we face. By modernizing and simplifying the development process, it lays the groundwork for building smarter—not just more. We're especially encouraged by the ordinance's alignment with both state mandates and the City's own Housing Element goals, offering a clear pathway toward greater housing equity.
Key highlights that stand out to us include:

- **Unlocking underused office spaces** for residential conversions, with the potential to create nearly 2,700 new homes.
- **Prioritizing transit-oriented development**, which not only supports sustainability but increases access to opportunity, especially for communities historically underserved.
- **Accelerating infill housing** in mixed-use zones, which adds vibrancy to neighborhoods and helps preserve open space.
- **Reimagining land use in office-zoned areas** to allow thousands of new residential units—reflecting a more adaptive, needs-based use of our built environment.

We're also pleased to see thoughtful attention paid to traffic and community safety measures for larger developments, which speaks to the ordinance's balanced approach.
At Highway City Community Development, we are committed to creating stable, thriving neighborhoods where families can put down roots and plan for their futures. This ordinance moves Fresno toward that vision by breaking down outdated barriers to housing while keeping community interests at the forefront.
We urge you to support and adopt the Fresno Housing Streamlining Ordinance when it comes before you on **May 1, 2025**. Our communities cannot afford further delay—this is the kind of leadership and innovation Fresno needs right now.

Warmly,

[redacted]

April Henry, Executive Director/CEO
Highway City Community Development, Inc & Teague Community Resource Center
[redacted]
HCCD is a local, placed based 501c3 nonprofit. Tax ID 77-0459711

**From:** [redacted]
**To:**
**Subject:** FW: letter of support for the Housing ordinance.
**Date:** Wednesday, April 30, 2025 12:35:05 PM
**Attachments:** Letter of Support for Housing Ordinance.docx.pdf

---

**From:** Esther Carver [redacted]
**Sent:** Wednesday, April 30, 2025 12:33 PM
**To:** Laura Rios [redacted]; Miguel Arias [redacted] Annalisa Perea [redacted]
**Subject:** letter of support for the Housing ordinance.

**External Email:** Use caution with links and attachments

Hello!

Please see letter attached for the (Development Code Text Amendment No. P24-00794)

***Esther Carver***
Executive Director

[redacted] Fresno CA 93701

Learn more about our work: Wilderness Program and Homeownership

April 30, 2024

Fresno City Council
2600 Fresno Street
Fresno, CA 93721

***Subject: Support for Fresno Housing Streamlining Ordinance (Development Code Text Amendment No. P24-00794)***

Dear Members of the Fresno City Council,

On behalf of Lowell CDC I am writing to express our support for the proposed Fresno Housing Streamlining Ordinance, also known as Development Code Text Amendment No. P24-00794. This forward-thinking initiative is a crucial step toward addressing Fresno's pressing housing needs and improving the efficiency and accessibility of housing development throughout our city. It encourages housing development in areas that already have vital city infrastructure, access to transportation and close to jobs and built communities.

The ordinance offers a strategic, equitable approach to increasing housing availability by streamlining the development process for a diverse range of housing types. While we are especially encouraged by the ordinance's key components, we are also concerned that these changes alone are not enough. These changes will most deeply affect communities in the north of Fresno while doing very little to focus development in downtown and in existing older neighborhoods. We encourage housing development across Fresno to serve a wide variety of household sizes and affordability needs. *We encourage the City to further create opportunities for approving office and commercial conversions that maybe zoned NMX to residential as well.*

These provisions align with the broader goal of promoting equitable, affordable, and sustainable housing for all Fresno residents. We also commend the ordinance's thoughtful *inclusion of traffic and community safety measures for larger projects*, as well as its potential to foster economic revitalization and social inclusivity.

Thank you for taking meaningful steps to promote housing affordability and choice while enhancing the quality of life for current and future residents. We urge you to adopt the Fresno Housing Streamlining Ordinance before you on April 24, 2024.

Sincerely,

**Esther Carver**

Executive Director, Lowell Community Development Corporation.