Exhibit I

CITY OF FRESNO
MITIGATED NEGATIVE DECLARATION
FOR
DEVELOPMENT PERMIT APPLICATION NO. P22-04122

City of Fresno
Planning and Development Department
2600 Fresno Street
Fresno, CA 93721

Prepared by:

LSA
2565 Alluvial Avenue, Suite 172
Clovis, CA 93611

Attachments:

Notice of Intent to Adopt a Mitigated Negative Declaration
Appendix G/Initial Study for a Mitigated Negative Declaration

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APPENDIX G/INITIAL STUDY FOR A MITIGATED NEGATIVE DECLARATION

Environmental Checklist Form for:
Development Permit Application No. P22-04122

1.	**Project title:** Development Permit Application No. P22-04122
2.	**Lead agency name and address:** City of Fresno Planning and Development Department 2600 Fresno Street Fresno, CA 93721
3.	**Contact person and phone number:** Robert Holt, Supervising Planner City of Fresno Planning and Development Department (559) 621-8056
4.	**Project location:** 7354 N Abby St, Fresno, CA 93720: Southeast of intersection of East Alluvial Avenue and North Abby Street (APN: 303-201-27)
5.	**Project sponsor's name and address:** Brian Saltikov Living Spaces 14501 Artesia Boulevard La Mirada, CA 90638
6.	**General & Community plan land use designation:** General Plan planned land use designation: Commercial – Regional Community Plan: Woodward Park Community Plan
7.	**Zoning:** CR/UGM/cz (Commercial Regional/Urban Growth Management/conditions of zoning)
8.	**Description of project:** Development Permit Application No. P22-04122 was filed on behalf of Living Spaces (Project Applicant). The following section describes the proposed Living Spaces Fresno Project (proposed project).

Existing Conditions

The project site is an approximately 8-acre site located in the City of Fresno. Figure 1 shows the site's regional and local context. The project site is surrounded by commercial uses to the north, commercial/office uses to the east (across from State Route 41[SR 41]), commercial uses to the south and commercial and residential uses to the west along with Pinedale Elementary School in the nearby vicinity. Figure 2 depicts an aerial photograph of the project site and surrounding land uses. The project site is primarily vacant, with the exception of two concrete utility structures located on the southwest corner and the central portion of the project site respectively. The project site also contains subsurface utility infrastructure. Chain link fencing currently bounds the project site's northern, eastern, and southern boundaries.

Project Characteristics

The proposed project would include the construction of an approximately 104,867 square-foot furniture retail store and showroom in the eastern portion of the project site, associated parking on the western portion and along the northeast boundary of the site, and utility infrastructure. Figure 3 shows the proposed site plan for the project. The main entrance to the facility would be 16 feet wide, located on the western end of the store facing the parking lot. The facility has three additional 3-foot doorways, two of which would function as emergency exits. The proposed retail store would include an 81,608 square-foot showroom. The proposed facility would also include a 4,682 square-foot stockroom and attached loading zone for delivery vehicles and customer pick up in the northeast corner, a 2,892 square-foot playroom for children, a 672 square-foot employee breakroom, a 412 square-foot conference room, a 478 square-foot prep kitchen, a 175 square-foot storage room for janitorial supplies, a cashier station, restrooms, and other administrative and utility rooms. The proposed project would also include a 320 square-foot café that would offer pre-packaged food, beer, and wine for sale (Conditional Use Permit No. P22-04472 would be filed in conjunction with this project to allow for on-site alcohol sales). Figure 4 shows the layout plan for the proposed furniture retail store. Figures 5 and 6 show the proposed elevations of the furniture retail store.

The proposed project would introduce approximately 6.9 acres of impervious surfaces to the project site. The proposed project would remove an approximately 105-foot-long portion of the existing chain link fence and curb and gutter in the northeast corner of the project site to improve fire protection vehicle and delivery vehicle access, and would remove an approximately 46-foot-long portion of the existing chain link fence and curb and gutter along the northwest boundary of the project site to create a vehicle ingress and egress driveway that would cross the adjacent commercial development north of the site and connect to proposed driveways along East Alluvial Avenue. The project would preserve the remaining chain-link fence bordering the project site's northern, eastern, and southern boundaries.

Operation

The proposed project would operate Monday through Sunday from 10:00 a.m. to 9:00 p.m. and employ approximately 85 staff members.

Access, Circulation and Parking

The proposed project would include 298 parking stalls, including 30 electrical vehicle (EV) stalls, seven Americans with Disabilities Act (ADA) compliant parking stalls and 36 clean air/ vanpool parking stalls. The proposed project would also include a 30-by-60-foot delivery vehicle loading zone in the northeast corner of the proposed retail facility. The proposed project would also provide five long term bicycle parking stalls. Vehicle access to the project site would be provided through one 30-foot-wide vehicle ingress and egress driveway along North Abby Street and one 30-foot-wide ingress and egress driveway located along the northwest boundary of the site; this driveway would connect to the adjacent commercial development north of the site and provide access for vehicles entering through, or exiting towards, one 30-foot-wide ingress and egress driveway and one 15-foot egress driveway along East Alluvial Avenue. All project driveways would be stop-controlled.

Circulation within the project site would be provided by a network of approximately 30-foot drive aisles. Pedestrian circulation for the proposed project would occur through an existing pedestrian sidewalk along the project's frontage with North Abby Street and through internal pedestrian sidewalks and walkways in the project site.

Landscaping

The proposed project would include approximately 36,648 square feet of landscaping along the perimeter of the site and within the project site. Approximately 93 percent of landscaped areas provided would be shaded by trees. The proposed project would remove two existing trees located along the project site's northern boundary. Figure 7 shows the proposed landscape plan for the project.

Utilities and Infrastructure

- **Water and Wastewater.** Water supply and wastewater services for the proposed project would be provided by the Pinedale County Water Services District. Existing water connection lines currently underly the project site and connect to existing an existing water main in North Abby Street. The proposed project would maintain current water connections, with the exception of one connection located along the site's northern boundary and install additional 2-inch water lines to improve water distribution and circulation in the project site. Additionally, existing sanitary sewer connection lines currently underly the project site and connect to an existing wastewater line on North Abby Street. The proposed project would remove most of the existing wastewater connections within the project site but would keep the direct connection line with the wastewater main on North Abby Street. The project would construct new 6-inch internal wastewater connections lines that would connect with the existing line connected to the main on North Abby Street.

- **Stormwater.** The Fresno Metropolitan Flood Control District (FMFCD) would provide flood control and urban storm water services to the project site. The project site contains existing surface drainage infrastructure, including storm drain inlets, manholes and catch basins. The proposed project would remove the existing private drainage infrastructure on the project site and would install new surface and subsurface drainage infrastructure (e.g., manholes, catch basins, drain inlets and drainage lines) to direct stormwater towards infrastructure along the site's southern boundary and west of the site in North Abby Street, where it would be redirected towards nearby ponding basin CN (Basin CN). The proposed project would also include the installation of bioretention areas along the site's eastern boundary, within the parking lot area, and along the entrance of the proposed retail facility.

- **Electricity and Natural Gas.** Electricity and natural gas services to the site are provided by Pacific Gas and Electric Company (PG&E). The project site currently contains a PG&E easement and a PG&E concrete utility structure in the central portion of the project site that would be removed. The project would connect to existing service lines in the vicinity of the project site.

- **Fire Protection.** The proposed retail facility would include a fire sprinkler system and an associated fire sprinkler riser room. The proposed project would include the installation of 3 fire hydrants and 8-inch fire service lines along the perimeter of the retail facility that would provide water supplies for fire protection services. Additionally, a fire department connection would be constructed adjacent to the retail store's western side, near the main entrance. Dedicated fire lanes would be constructed throughout the perimeter of the proposed retail store and along main circulation driveways within the project site.

- **Lighting.** The proposed project would include the installation of new exterior lighting, with the installation of approximately 37 new lights along the western side of the proposed retail store near the main entrance, within the parking lot area, and along sections of the project site's northern, western, and southern boundaries.

- **Solid Waste.** The proposed project would include a vertical cardboard baler on-site which would create 1,000-pound bales of cardboard. The proposed project would also include an Expanded Polystyrene (EPS) foam melting machine to condense waste EPS foam into blocks for recycling. Both recycled cardboard bales and EPS foam blocks would be returned to Project Applicant's distribution centers via delivery trucks and would be sold as raw material for recycled goods.

<u>Grading and Construction</u>

Construction of the proposed project is expected to occur over a period of 10 months

starting in June 2023. Site preparation would include removal of existing utility infrastructure, rocks, debris, and vegetation from the project site. Construction of the proposed project would comply with City standards, including the City's current building code, landscape standards, and lighting standards. In addition, the project site would be graded similar to other developments throughout the City.

9. **Surrounding land uses and setting:**

	Planned Land Use	Existing Zoning	Existing Land Use
North	Commercial - Regional	CR - Commercial Regional	General Heavy Commercial
East	Employment - Office	O - Office	Office/Commercial
South	Commercial - Regional	CR - Commercial Regional	General Heavy Commercial
West	Corridor/Center Mixed Use	CMX - Corridor/Center Mixed Use	General Heavy Commercial/Medium Density Residential

10. **Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement):**

- Planning and Development Department;
- Building & Safety Services Division;
- Department of Public Works;
- Department of Public Utilities;
- County of Fresno, Department of Public Health;
- City of Fresno Fire Department;
- Fresno Metropolitan Flood Control District; and
- San Joaquin Valley Air Pollution Control District.

11. **Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code (PRC) Section 21080.3.1? If so, has consultation begun?**

The State requires lead agencies to consider the potential effects of proposed projects and consult with California Native American tribes during the local planning process for the purpose of protecting Traditional Tribal Cultural Resources through the California Environmental Quality Act (CEQA) Guidelines. Pursuant to PRC Section 21080.3.1, the lead agency shall begin consultation with the California Native

	American tribe that is traditionally and culturally affiliated with the geographical area of the proposed project. Such significant cultural resources are either sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a tribe which is either on or eligible for inclusion in the California Historic Register or local historic register, or, the lead agency, at its discretion, and support by substantial evidence, choose to treat the resources as a Tribal Cultural Resources (PRC Section 21074(a)(1-2)). According to the most recent census data, California is home to 109 currently recognized Indian tribes. Tribes in California currently have nearly 100 separate reservations or Rancherias. Fresno County has a number of Rancherias such as Table Mountain Rancheria, Millerton Rancheria, Big Sandy Rancheria, Cold Springs Rancheria, and Squaw Valley Rancheria. These Rancherias are not located within Fresno city limits. Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See PRC Section 21083.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per PRC Section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that PRC Section 21082.3(c) contains provisions specific to confidentiality. Currently, the Table Mountain Rancheria Tribe and the Dumna Wo Wah Tribe have requested to be notified pursuant to Assembly Bill 52 (AB 52). A certified letter was mailed to the above-mentioned tribes on March 14, 2023. The 30-day comment period ended on April 13, 2023. Neither tribe requested consultation.

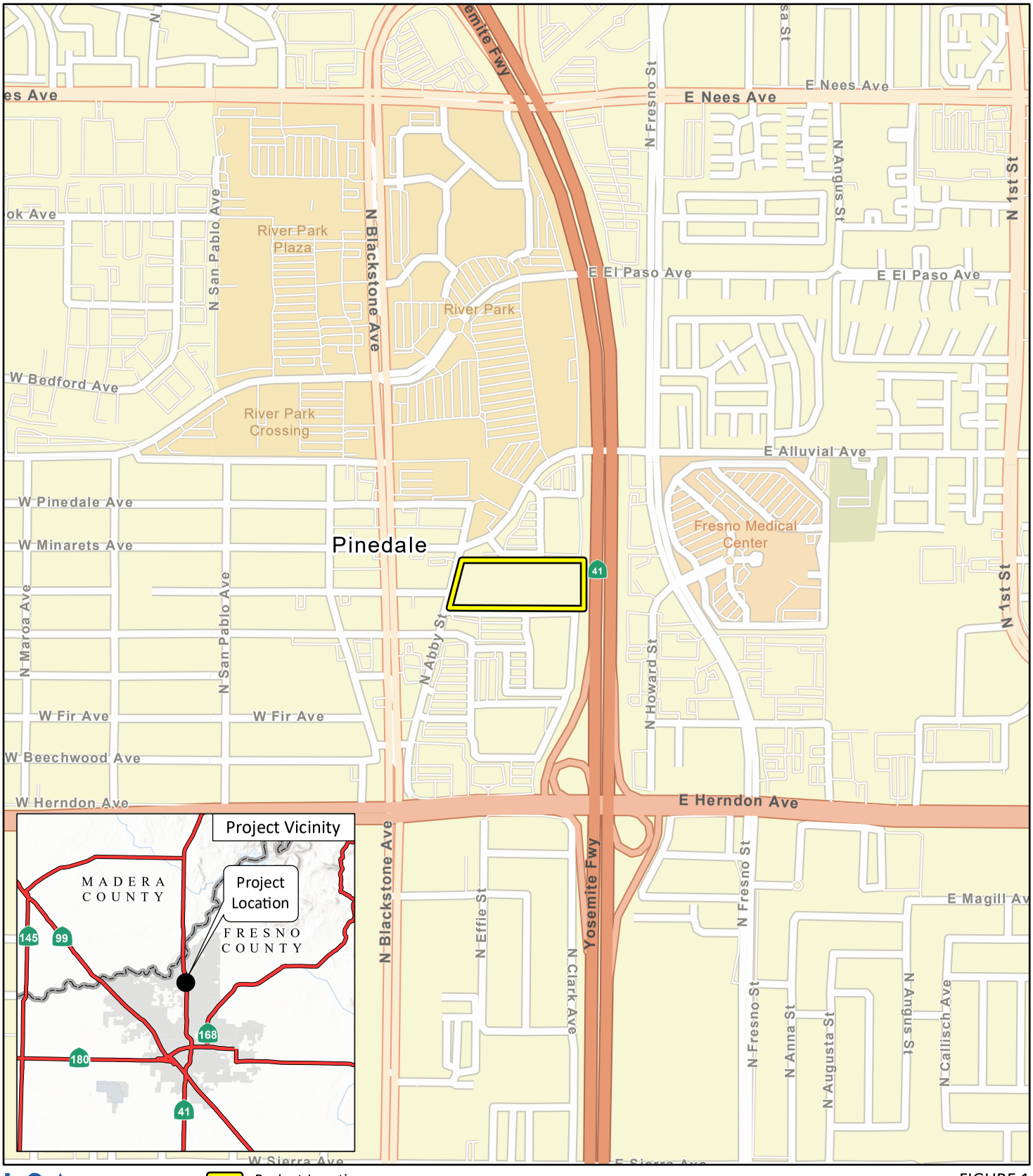

FIGURE 1

SOURCE: Esri Streets (2022)

J:\LSP2201\GIS\Pro\Living Spaces Fresno Project\Living Spaces Fresno Project.aprx (12/8/2022)

Living Spaces Fresno Project

Regional Project Location

LSA

Project Site Boundary

FIGURE 2

0 150 300
FEET

SOURCES: Google Earth, 6/9/2022; LSA, 2022

Living Spaces Fresno Project

Aerial Photograph of the Project Site and Surrounding Land Uses

I:\LSP2201\G\Aerial Photo of Site&Surrounding LU.ai (12/9/2022)

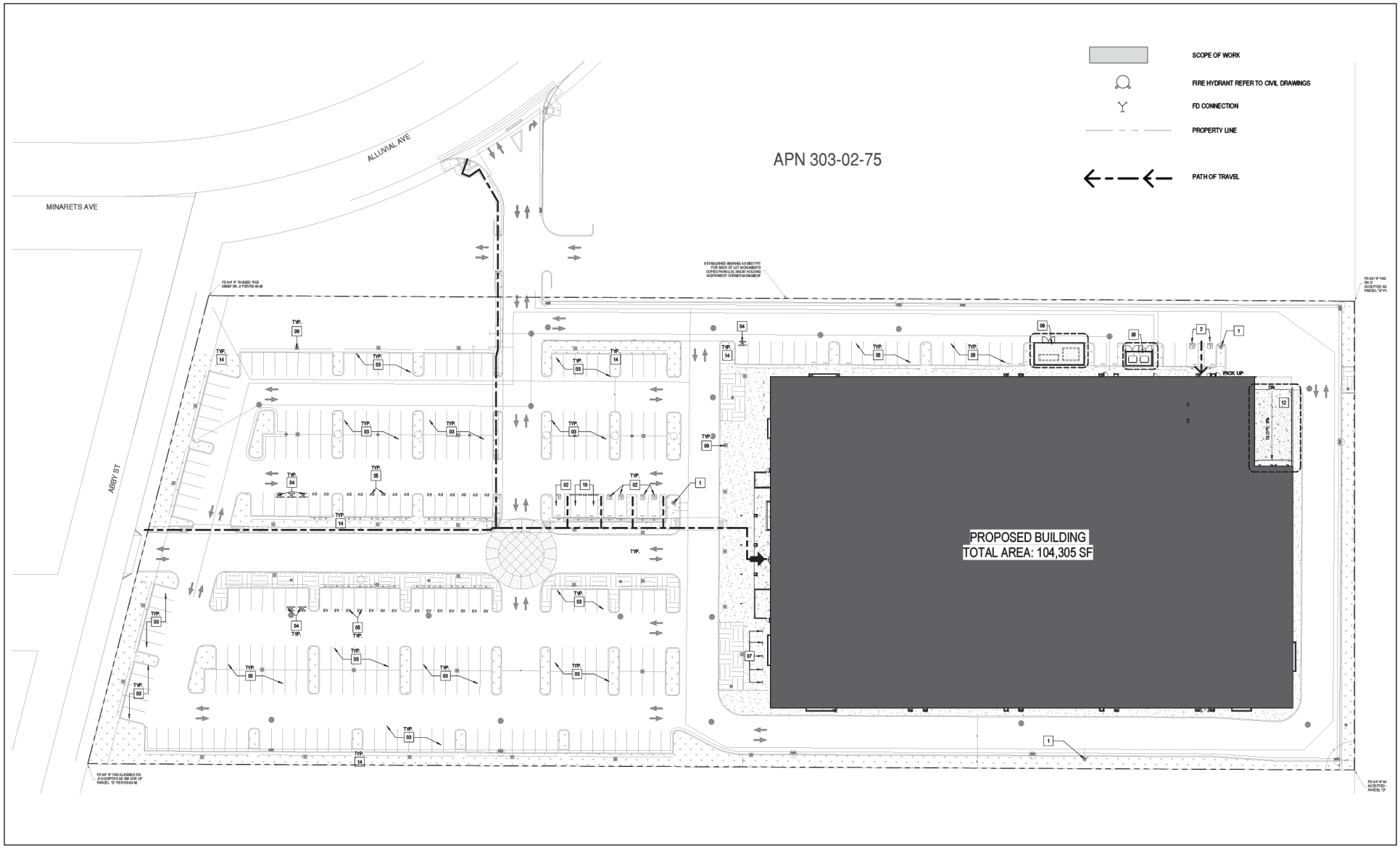

FIGURE 3

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N

NOT TO SCALE

SOURCE: KTGY Architecture + Planning, 2022

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Living Spaces Fresno Project
Site Plan

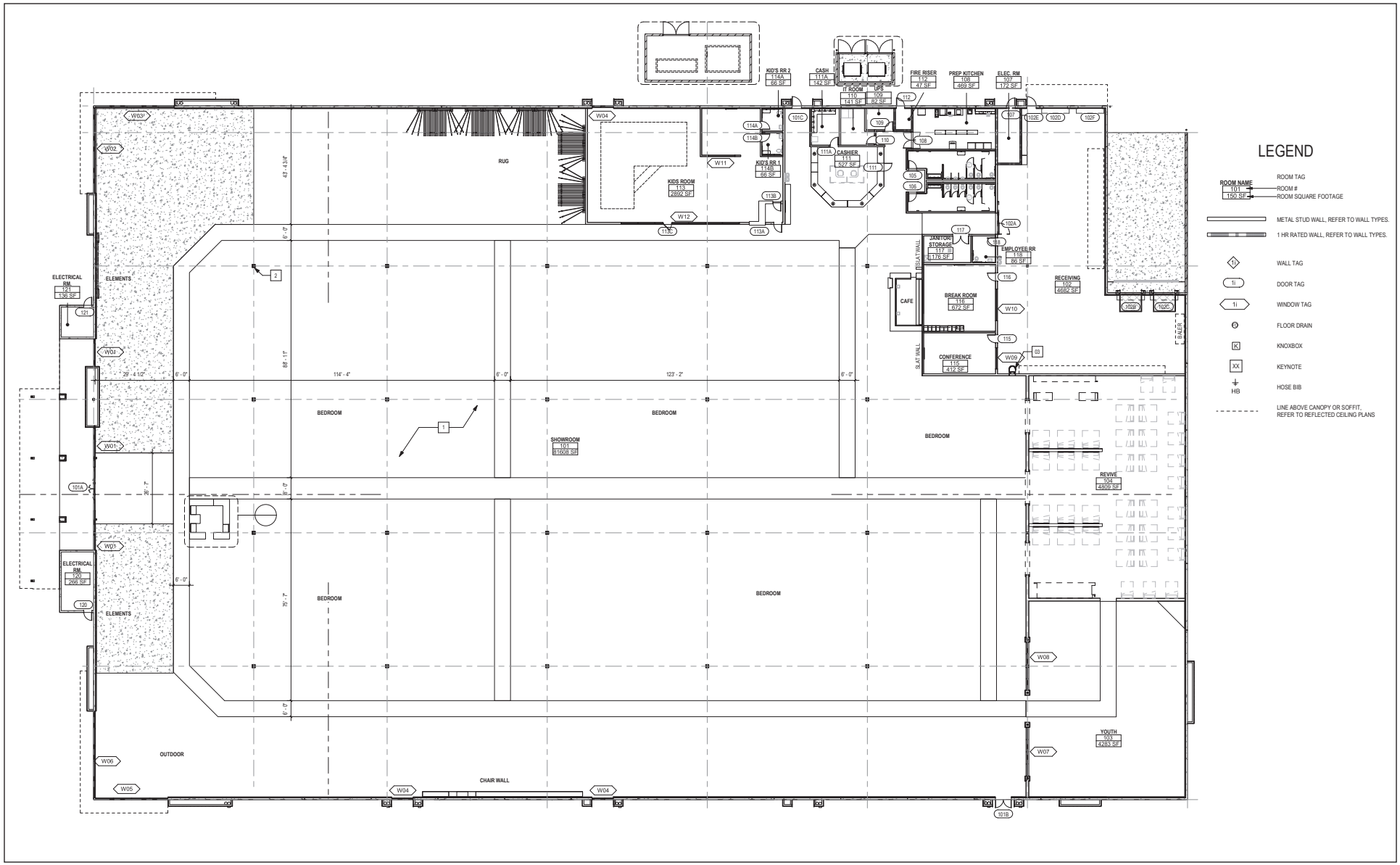

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FIGURE 4

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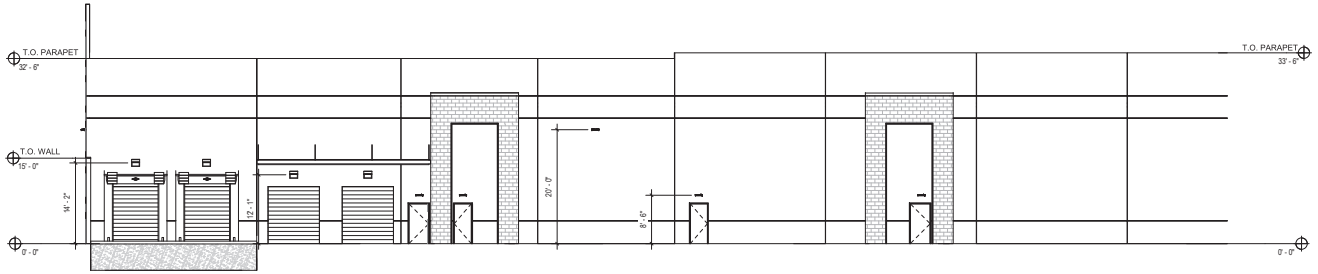
NOT TO SCALE

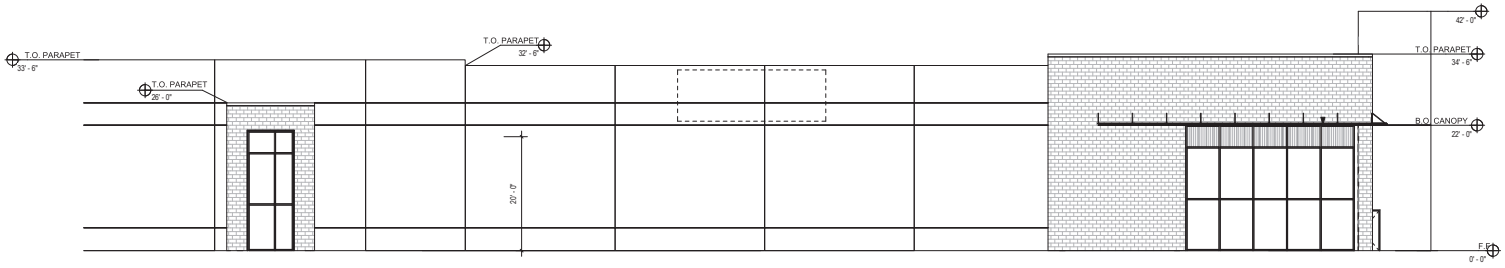
SOURCE: KTGY Architecture + Planning, 2022

I:\LSP2201\G\Layout of Furniture Retail Store.ai (1/19/2023)

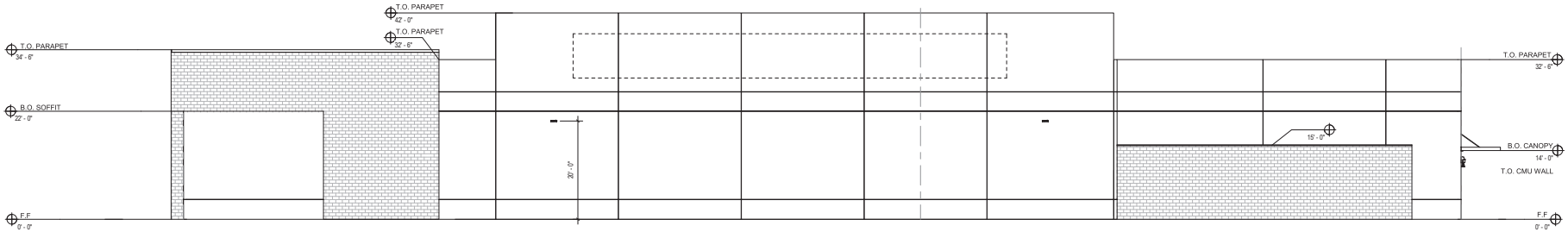
Living Spaces Fresno Project
Layout of Furniture Retail Store



NORTH ELEVATION - B 3



NORTH ELEVATION - A 2



EAST ELEVATION 1

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FIGURE 5

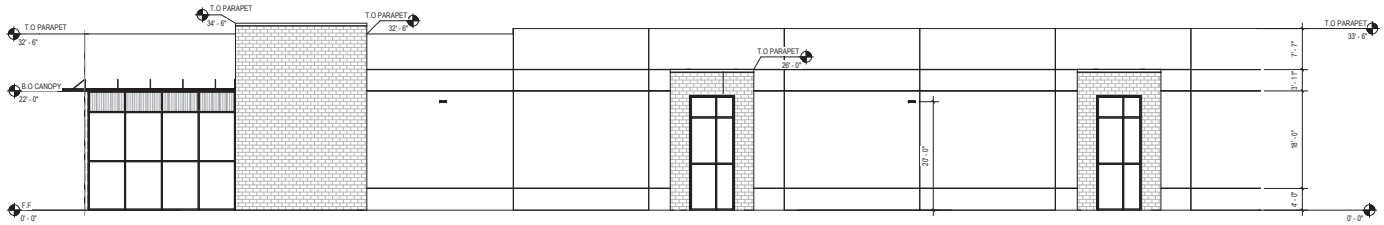
NOT TO SCALE

SOURCE: KTGY Architecture + Planning, 2022

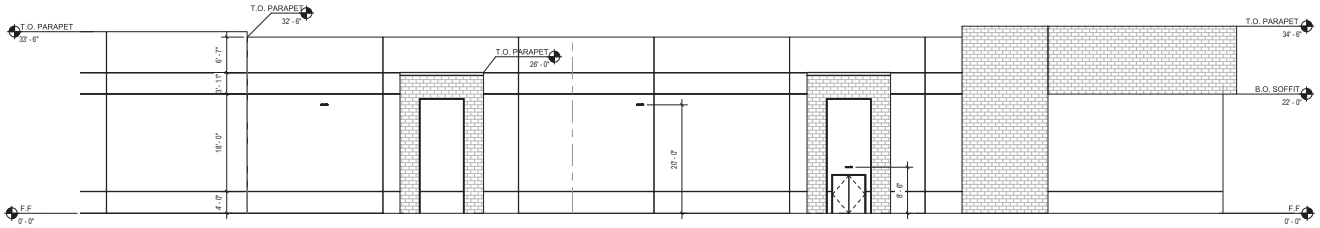
I:\LSP2201\G\Elevations of Furniture Retail Store-N&E.ai (1/19/2023)

Living Spaces Fresno Project

Elevations of Furniture Retail Store - North and East Elevations



SOUTH ELEVATION - B 3



SOUTH ELEVATION -A 2

WEST ELEVATION 1

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FIGURE 6

NOT TO SCALE

SOURCE: KTGY Architecture + Planning, 2022

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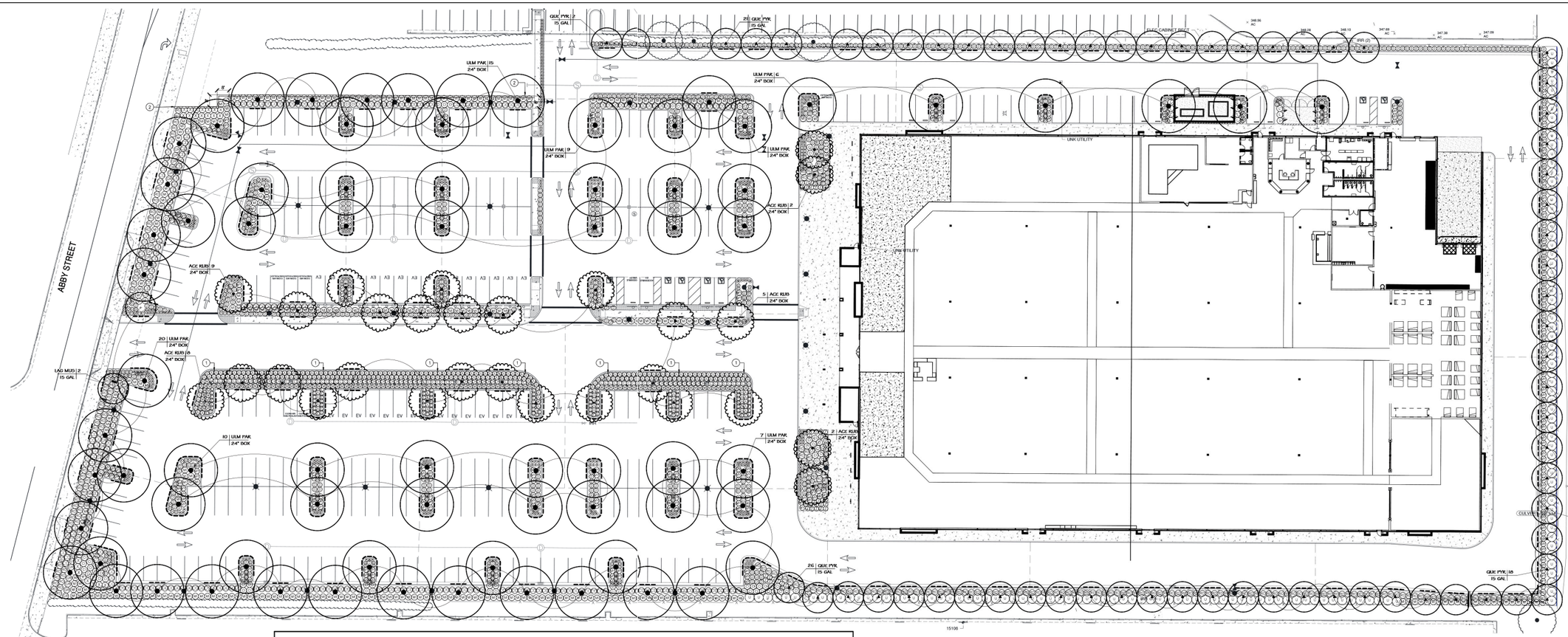
Living Spaces Fresno Project

Elevations of Furniture Retail Store - South and West Elevations



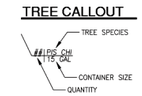
PLANT LEGEND

SYMBOL	BOTANICAL NAME	COMMON NAME	SIZE	QUANTITY	WATER USE	APPROX. SPACING	COMMENTS/NOTES	DETAIL REFERENCE
TREES								
ACE RUB	ACER RUBRUM 'OCTOBER GLORY'	OCTOBER GLORY RED MAPLE	24" BOX	28	MODERATE	PER PLAN	F&B, FGR, HI BR, MATCH	1&2/ L4.0
LAG MUS	LAGERSTROEMIA X 'MUSKOGREE'	LIGHT LAVENDER CRAPE MYRTLE	15 GAL	2	LOW	PER PLAN	F&B, FGR, PURPLE FLW, HI BR, MATCH	1&2/ L4.0
QUE PYR	QUERCUS ROBUR 'PYRAMICH'	SKYMASTER ENGLISH OAK	15 GAL	67	LOW	PER PLAN	F&B, FGR, HI BR, MATCH	1&2/ L4.0
ULM PAR	ULMUS PARVIFOLIA	LACEBARK ELM	24"BOX	73	MODERATE	PER PLAN	F&B, FGR, HI BR, MATCH	1&2/ L4.0
SHRUBS								
C	CALAMAGROSTIS X ACUTIFLORA 'KARL FOERSTER'	FEATHER REED GRASS	1 GAL	56	LOW	48"	BIOSWALE, F&B, MATCH, TRI SP	3&4/ L4.0
CH	CHONDROPETALUM TECTORUM 'EL CAMPO'	CAPE RUSH	1 GAL	42	LOW	36"	BIOSWALE, F&B, MATCH, TRI SP	3&4/ L4.0
CI	CISTUS X PURPUREUS	ORCHID ROCKROSE	5 GAL	91	LOW	42"	F&B, MATCH, TRI SP	3&4/ L4.0
CK	COTONEASTER DAMMERI 'LOWFAST'	LOWFAST BEARBERRY COTONEASTER	1 GAL	272	LOW	36"	F&B, MATCH, TRI SP	3&4/ L4.0
D	DIETES BICOLOR	FORTNIGHT LILY	5 GAL	639	LOW	36"	F&B, MATCH, TRI SP	3&4/ L4.0
GR	GREVILLEA X 'NOELLII'	GREVILLEA	5 GAL	29	LOW	42"	F&B, MATCH, TRI SP	3&4/ L4.0
H	HESPERALOE PARVIFLORA 'BRAKELIGHTS'	BRAKELIGHTS RED YUCCA	1 GAL	62	LOW	30"	F&B, MATCH, TRI SP	3&4/ L4.0
E	LEYMUS TRITICOIDES 'GREY DAWN'	GREY CREEPING WILD RYE	1 GAL	93	LOW	36"	BIOSWALE, F&B, MATCH, TRI SP	3&4/ L4.0
JU	JUNCUS PATENS	CALIFORNIA GRAY RUSH	1 GAL	260	MODERATE	30"	BIOSWALE, F&B, MATCH, TRI SP	3&4/ L4.0
L	LIGUSTRUM JAPONICUM 'TEXANUM'	WAX LEAF PRIVET	5 GAL	14	LOW	42"	F&B, MATCH, TRI SP	3&4/ L4.0
M	MUHLENBERGIA RIGENS	DEER GRASS	1 GAL	118	LOW	36"	BIOSWALE, F&B, MATCH, TRI SP	3&4/ L4.0
MY	MYOPORUM PARVIFOLIUM 'PUTAH CREEK'	PUTAH CREEK TRAILING MYOPORUM	1 GAL	365	LOW	36"	F&B, MATCH, TRI SP	3&4/ L4.0
U	PRUNUS CAROLINIANA 'BRIGHT 'N TIGHT'	BRIGHT 'N TIGHT CAROLINA LAUREL	15 GAL	133	LOW	54"	F&B, MATCH, TRI SP	3&4/ L4.0
MI	RHAPHIOLEPIS UMBELLATA 'MINOR'	YEDDA HAWTHORN	5 GAL	360	LOW	42"	F&B, MATCH, TRI SP	3&4/ L4.0
RO	ROSMARINUS OFFICINALIS 'PROSTRATUS'	DWARF ROSEMARY	1 GAL	222	LOW	36"	F&B, MATCH, TRI SP	3&4/ L4.0
R	TEUCRIUM FRUTICANS 'AZUREUM'	AZURE BUSH GERMANDER	1 GAL	64	LOW	36"	F&B, MATCH, TRI SP	3&4/ L4.0
T	TULBAGHIA VIOLACEA 'VARIEGATA'	STRIPED CAPE GARLIC	1 GAL	422	LOW	30"	F&B, MATCH, TRI SP	3&4/ L4.0
X	XYLOSMA CONGESTUM 'COMPACTA'	COMPACT XYLOSMA	5 GAL	23	LOW	42"	F&B, MATCH, TRI SP	3&4/ L4.0
Z	ZAUSCHNERIA CALIFORNICA	CALIFORNIA FUCHSIA	1 GAL	41	LOW	36"	F&B, MATCH, TRI SP	3&4/ L4.0
VINES								
V	FICUS PUMILA	CREEPING FIG	5 GAL	10	MODERATE	PER PLAN	F&B, MATCH, TTW	5/ L4.0
MISCELLANEOUS								
	ROOT BARRIER DEEPROOT UB24-2, OR EQUAL.			3,276 LF			DEEPROOT OR EQUAL. WWW.DEEPROOT.COM, P: (800) 458-7668.	6/ L4.0
1	3" DEPTH COBBLE MULCH			4,793 SF				8/ L4.0
2	12" WIDE CONCRETE CURB			244 LF				7/ L4.0

PLANT LIST ABBREVIATIONS

BR GR	BRANCHED TO GROUND
DV	DWARF VARIETY
F&B	FULL DENSE, BUSHY, VIGOROUS PLANTS, WITH YOUNG GROWTH CLOSELY SPACED ON BRANCHES
FGR	FREE OF GIRDLING ROOTS
FLW	FLOWER
GAL	GALLON CAN
HI BR	HIGH BRANCHED
LO BR	LOW BRANCHED
MATCH	MATCHED SIZE, FORM, CALIPER, BRANCHING AND CULTIVAR. SELECT FROM ONE LOT, ONE GROWER, FOR GUARANTEED CONSISTENCY THROUGH LIFE OF PLANTS. IN GENERAL PLANTS WITHIN A GROUP OR AREA ARE TO BE MATCHED, UNLESS NOTED OTHERWISE
MULTI	MULTI STEMMED
SL	SINGLE, STRAIGHT, DOMINANT LEADER
TRI SP	TRIANGULARLY SPACED
TTW	TRAIN TO WALL
VAR	VARIEGATED SPECIES

TREE CALLOUT



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SOURCE: O'Dell Engineering, 2022

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FIGURE 7

Living Spaces Fresno Project
Landscape Plan

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ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

☐	Aesthetics	☐	Agriculture and Forestry Resources
☐	Air Quality	☐	Biological Resources
☐	Cultural Resources	☐	Energy
☐	Geology/Soils	☐	Greenhouse Gas Emissions
☐	Hazards and Hazardous Materials	☐	Hydrology/Water Quality
☐	Land Use/Planning	☐	Mineral Resources
☐	Noise	☐	Population/Housing
☐	Public Services	☐	Recreation
☐	Transportation	☐	Tribal Cultural Resources
☐	Utilities/Service Systems	☐	Wildfire
☐	Mandatory Findings of Significance		

DETERMINATION: (To be completed by the Lead Agency)

On the basis of this initial evaluation:

___	I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
_X_	I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
___	I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT (EIR) is required.
___	I find that the proposed project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An EIR is required, but it must analyze only the effects that remain to be addressed.
___	I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable

	standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Robert Holt 05/05/2023

Rob Holt, Supervising Planner Date

EVALUATION OF ADDITIONAL ENVIRONMENTAL IMPACTS NOT ASSESSED IN PROGRAM ENVIRONMENTAL IMPACT REPORT SCH NO. 2019050005 PREPARED FOR THE APPROVED FRESNO GENERAL PLAN (GP PEIR):

1. For purposes of this Initial Study, the following answers have the corresponding meanings:
   a. "No Impact" means the specific impact category does not apply to the project, or that the record sufficiently demonstrates that project specific factors or general standards applicable to the project will result in no impact for the threshold under consideration.
   b. "Less Than Significant Impact" means there is an impact related to the threshold under consideration, but that impact is less than significant.
   c. "Less Than Significant with Mitigation Incorporation" means there is a potentially significant impact related to the threshold under consideration, however, with the mitigation incorporated into the project, the impact is less than significant. For purposes of this Initial Study "mitigation incorporated into the project" means mitigation originally described in the GP PEIR and applied to an individual project, as well as mitigation developed specifically for an individual project.
   d. "Potentially Significant Impact" means there is substantial evidence that an effect may be significant related to the threshold under consideration.

2. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

3. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

4. Once the lead agency has determined that a particular physical impact may occur,

then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

5. "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from, "Earlier Analyses," as described in (6) below, may be cross-referenced).

6. Earlier analyses may be used where, pursuant to the tiering, Program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:

   a. Earlier Analysis Used. Identify and state where they are available for review.

   b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in the PEIR or another earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

   c. Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

7. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

8. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

9. The explanation of each issue should identify:

   a. The significance criteria or threshold, if any, used to evaluate each question; and

   b. The mitigation measure identified, if any, to reduce the impact to less than significance.

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

DISCUSSION

a) Have a substantial adverse effect on a scenic vista?

A scenic vista is generally defined as a public vantage point with an expansive view of a significant landscape feature. An impact on scenic vistas is considered significant if it substantially diminishes, blocks, or impedes an expansive view of a significant landscape feature from a public vantage point. The City of Fresno contains views of highly valued features such as the San Joaquin River, Sierra Nevada Mountain foothills, and buildings in Downtown Fresno. Figure POSS-2 in the Fresno General Plan has

identified six vista points along the San Joaquin River bluff.[1]

The project site is located in a developed area of the City of Fresno and is not located in an area with expansive or far field views. The proposed project would include the construction of a furniture retail store and associated parking, landscaping and infrastructure. The project site is bounded by commercial uses to the north, south, and east, and by commercial and residential uses to the west. There are no significant trees, rock outcroppings, and/or historic buildings located on the subject property that have been identified as important scenic resources or would otherwise constitute significant landscape features. Therefore, the proposed project would not substantially diminish any scenic vistas within or near the project area and would likewise not substantially block or impede surrounding views. Therefore, the proposed project would result in a less-than-significant impact related to a substantial adverse effect on a scenic vista, and no mitigation is required.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

There are no trees, rock outcroppings, and/or historic buildings located on the subject property that have been identified as important scenic resources in the Fresno General Plan, General Plan PEIR or Municipal Code, or would otherwise constitute significant landscape features. Additionally, there are no officially-designated State Scenic Highways in the immediate vicinity of the project site. According to the California Department of Transportation (Caltrans) mapping of State Scenic Highways,[2] the County of Fresno has one officially designated State Scenic Highways located along State Route (SR-) 180, east of the City of Fresno and approximately 21 miles southeast of the project site. Three eligible State Scenic Highways are also located within the County of Fresno, the nearest of which is located along SR-168 east of the City of Clovis, approximately 4.6 miles southeast from the project site. None of these are in the immediate vicinity of the project site. Since there are no eligible or officially designated State Scenic Highways within the immediate vicinity of the project site, the project would not impact a designated State Scenic Highway. Furthermore, the eligibility of the three State Scenic Highways, scenic resources located within the highway segments or its viewshed would not be impacted by the proposed project. Therefore, no impact on scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State Scenic Highway would occur as a result of the proposed project.

c) In non-urbanized areas, substantially degrade the existing visual character or

1 City of Fresno. 2014. Fresno General Plan. Chapter 5: Parks, Open Space, and Schools. Figure POSS-2: San Joaquin River Parkway Path & Trail Access Points. pg.5-19. Website: https://www.fresno.gov/darm/wp-content/uploads/sites/10/2019/07/General-Plan-5-Parks-Open-Space-and-Schools-7-19.pdf (accessed January 2023).

2 California Department of Transportation (Caltrans). Mapping of State Scenic Highways. Website: https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways (accessed December 2022).

quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

The proposed project would alter the existing visual character of the project site from vacant to developed with a furniture retail store and associated parking, landscaping and infrastructure. As identified above, nearby parcels consist of commercial and residential uses. Although the proposed project would change the visual characteristics of the project site by developing the site, the design of the project would be consistent with the visual character within the project area. The project site is zoned in the City's Commercial – Regional (CR) District, which is intended to meet local and regional retail demand, such as large-scale retail, office, civic and entertainment uses, shopping malls with large-format or "big-box" retail, and supporting uses such as gas stations and hotels. The proposed project would introduce uses compatible with the zoning of the project site.[3] Therefore, the proposed project is consistent with the existing zoning of the site and would not conflict with any applicable zoning or other regulations governing scenic quality.

In addition, the project design would be subject to the City's Design Guidelines adopted for the City's General Plan and Municipal Code which apply to site layout, building design, landscaping, interior street design, lighting, parking and signage. Detailed architectural plans, color palettes and building materials as well as landscaping plans would be submitted by the project developer to the City of Fresno Planning and Development Department prior to issuance of any building permits.

Therefore, the proposed project would not substantially degrade the visual character of the area and would not diminish the visual quality of the area, as they would be consistent with the existing visual setting. The proposed project itself is not visually imposing against the scale of the existing adjacent uses and nature of the surrounding area. As such, the proposed project would not conflict with the site's zoning or with regulations governing scenic quality. A less-than-significant impact would occur.

d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

The project site is in a primarily urbanized area, which is subject to preexisting exterior lighting from surrounding development and existing street lighting.

Construction of the proposed project would include temporary light and glare resulting from construction activities that could adversely affect day or nighttime views.

[3] City of Fresno. 2016. Fresno Municipal Code Chapter 15: Citywide Development Code. Table 15-1202: Land Use Regulations—Commercial Districts. Website: https://www.fresno.gov/darm/wp-content/uploads/sites/10/2016/11/Complete_Code_March_2017.pdf (Accessed December 2022).

Construction could result in light and glare from construction vehicles or equipment; however, construction activities are anticipated to occur primarily during daylight hours and once construction is completed, light and glare from these activities would cease to occur. As described in the Project Description, the proposed project would include new on-site exterior lighting, with the installation of approximately 37 new lights along the western side of the proposed retail store near the main entrance, within the parking lot area, and along sections of the project site's northern, western, and southern boundaries.

Nighttime lighting levels would increase over current levels in the project area, associated with parking lot lights and security-related lighting. While compliance with California Building Code (Title 24, California Code of Regulations [CCR]) standards would minimize the proposed project's light and glare impacts, the proposed project's lighting systems could constitute substantial new sources of light relative to baseline conditions if the project's lighting systems are significantly more intense than existing lighting sources or if they are not appropriately shielded to prevent light diffusion. Additionally, the proposed project could create a substantial new source of glare if highly reflective building materials are used.

The new lighting and structures that would be constructed as part of the proposed project would be comparable to those of other commercial uses in the vicinity of the project site. Although potential light and glare from the proposed project could affect operation of vehicles on SR 41, located east of the project site, implementation of applicable lighting standards established in the Fresno Municipal Code and implementation of Mitigation Measures AES-1 through AES-4, described below, would reduce potentially significant effects. All exterior lighting at the project site would be pointed downward toward the project site to minimize spillover of light outside the project site's property line. In addition, the proposed project would be required to comply with Article 25, Performance Standards, of the Municipal Code, which includes standards related to lighting and glare. Further, implementation Mitigation Measures AES-1 and AES-2 would ensure that the proposed project's lighting systems do not create a substantial new source of light by requiring shielding mechanisms to direct light away from nearby uses. As a result, any new sources of light resulting from the proposed project would not be substantial in the context of existing lighting sources. Implementation of Mitigation Measure AES-3 would ensure that the proposed project's lighting systems do not create a substantial new source of light by imposing a cap on the intensity of lighting systems based on the average intensity of the surrounding streets.

Additionally, while the project does not propose use of highly reflective glass elements or building materials, Mitigation Measure AES-4 requires materials used on building façades to be non-reflective. Therefore, any new source of glare would not be substantial.

Accordingly, with the incorporation of Mitigation Measures AES-1 through AES-4, the

project's potential impacts would be less than significant.

Mitigation Measures

Mitigation Measure AES-1: Lighting systems for street and parking areas shall include shields to direct light to the roadway surfaces and parking areas. Vertical shields on the light fixtures shall also be used to direct light away from adjacent light sensitive land uses such as residences.

Mitigation Measure AES-2: Lighting systems for non-residential uses, not including public facilities, shall provide shields on the light fixtures and orient the lighting system away from adjacent properties. Low intensity light fixtures shall also be used if excessive spillover light onto adjacent properties will occur.

Mitigation Measure AES-3: Lighting systems for freestanding signs shall not exceed 100 foot Lamberts (FT-L) when adjacent to streets which have an average light intensity of less than 2.0 horizontal footcandles and shall not exceed 500 FT-L when adjacent to streets which have an average light intensity of 2.0 horizontal footcandles or greater.

Mitigation Measure AES-4: Materials used on building facades shall be non-reflective.

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
II. AGRICULTURE AND FORESTRY RESOURCES – In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				X
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?				X
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?				X
d) Result in the loss of forest land or conversion of forest land to non-forest use?				X

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?				X

DISCUSSION

a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

The project site is located within an urbanized area of Fresno, surrounded by commercial uses to the north, commercial/office uses to the east (across from SR 41), commercial uses to the south, and commercial and residential uses to the west. The project site is classified as Urban and Built-Up Land by the California Department of Conservation Farmland Mapping and Monitoring Program (FMMP)[4]. There are no agricultural production uses located within or adjacent to the project site. Therefore, development of the proposed project would not convert agricultural land to a non-agricultural use. The proposed project would not result in the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to a non-agricultural use and, no impact would occur.

b) Conflict with existing zoning for agricultural use or a Williamson Act contract?

The project site is zoned in the City's Commercial – Regional (CR) district and designated Commercial – Regional in the Fresno General Plan. The project site is not zoned for agricultural use and is not subject to a Williamson Act contract. Therefore, development of the proposed project would not conflict with existing zoning for agricultural use or a Williamson Act contract, resulting in no impact.

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production

4 California Department of Conservation. 2016. California Important Farmland Finder. Available online at: https://maps.conservation.ca.gov/DLRP/CIFF/ (Accessed December 2022).

(as defined by Government Code section 51104(g))?

The project site is located within an existing urban area and is zoned within the Commercial – Regional (CR) district within the City of Fresno. The project site is not currently used for timberland production, nor is it zoned for forest land or timberland. Therefore, the proposed project would have no impact to existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g)), and no mitigation is required.

d) Result in the loss of forest land or conversion of forest land to non-forest use?

The project site is located in an existing urban area and is currently vacant. There is no existing forest land within the project site, and the site is not zoned as forest land. The proposed project would not convert forest land to non-forest use and would result in no impact to the loss or conversion of forest land to a non-forest use, and no mitigation is required.

e) Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?

Please refer to discussions a) and c) of this section. The project site is located within an existing urban environment and would not result in the conversion of farmland to non-agricultural uses or forest land to non-forest uses. Therefore, the project would not result in conversion of Farmland to non-agricultural use, or conversion of forest land to non-forest use would occur, and no mitigation is required.

Mitigation Measure

The proposed project would not result in any potentially significant impacts related to agriculture and forestry resources, and no mitigation is required.

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
III. AIR QUALITY – Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan (*e.g.*, by having potential emissions of regulated criterion pollutants which exceed the San Joaquin Valley Air Pollution Control Districts (SJVAPCD) adopted thresholds for these pollutants)?		X		
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?		X		
c) Expose sensitive receptors to substantial pollutant concentrations?			X	
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?			X	

DISCUSSION

a) Conflict with or obstruct implementation of the applicable air quality plan?

The City of Fresno is part of the San Joaquin Valley Air Basin (SJVAB), which is within the jurisdiction of the San Joaquin Valley Air Pollution Control District (SJVAPCD). The

SJVAPCD is responsible for air quality regulation within the eight-county San Joaquin Valley region.

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

CEQA requires that certain proposed projects be analyzed for consistency with the applicable air quality plan. An air quality plan describes air pollution control strategies to be implemented by a city, county, or region classified as a non-attainment area. The main purpose of the air quality plan is to bring the area into compliance with the requirements of the federal and State air quality standards. To bring the SJVAB into attainment, the SJVAPCD adopted the 2022 Plan for the 2015 8-Hour Ozone Standard in December 2022 to satisfy Clean Air Act requirements and ensure attainment of the 70 parts per billion (ppb) 8-hour ozone standard.

To ensure the SJVAB's continued attainment of the U.S. Environmental Protection Agency (USEPA) PM_{10} standard, the SJVAPCD adopted the 2007 PM_{10} Maintenance Plan in September 2007. SJVAPCD Regulation VIII (Fugitive PM_{10} Prohibitions) is designed to reduce PM_{10} emissions generated by human activity. The SJVAPCD adopted the 2018 plan for the 1997, 2006, and 2012 $PM_{2.5}$ standards to address the USEPA federal annual $PM_{2.5}$ standard of 12 $\mu g/m^3$, established in 2012.

For a project to be consistent with SJVAPCD air quality plans, the pollutants emitted from a project should not exceed the SJVAPCD emission thresholds or cause a significant impact on air quality. In addition, emission reductions achieved through implementation of offset requirements are a major component of the SJVAPCD air quality plans. As discussed below in discussion b), and as shown in Table 1, construction of the proposed project would not result in the generation of criteria air pollutants that would exceed SJVAPCD thresholds of significance. Implementation of Mitigation Measure AIR-1 would further reduce construction dust impacts. Additionally, as shown in Table 2, long-term operational emissions associated with the proposed project, including area, energy, and mobile source emissions, would also not exceed SJVAPCD established significance thresholds. Therefore, impacts related to the proposed project's potential to conflict with or obstruct implementation of the applicable air quality plan would be less than significant with mitigation.

b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

The SJVAB is designated as non-attainment for O_3 and $PM_{2.5}$ for federal standards and non-attainment for O_3, PM_{10}, and $PM_{2.5}$ for State standards. The SJVAPCD's non-

attainment status is attributed to the region's development history. Past, present, and future development projects contribute to the region's adverse air quality impacts on a cumulative basis. By its very nature, air pollution is largely a cumulative impact. No single project is sufficient in size to, by itself, result in non-attainment of ambient air quality standards. Instead, a project's individual emissions contribute to existing cumulatively significant adverse air quality impacts. If a project's contribution to the cumulative impact is considerable, then the project's impact on air quality would be considered significant.

Short-Term Construction Emissions. During construction, short-term degradation of air quality may occur due to the release of particulate emissions generated by grading, paving, building, and other activities. Emissions from construction equipment are also anticipated and would include CO, NO_x, reactive organic gases (ROG), directly emitted particulate matter ($PM_{2.5}$ and PM_{10}), and toxic air contaminants (TACs) such as diesel exhaust particulate matter.

Project construction activities would include site preparation, grading, building construction, paving, and architectural coating activities. Construction-related effects on air quality from the proposed project would be greatest during the site preparation phase due to the disturbance of soils. If not properly controlled, these activities would temporarily generate particulate emissions. Sources of fugitive dust would include disturbed soils at the construction site. Unless properly controlled, vehicles leaving the site would deposit dirt and mud on local streets, which could be an additional source of airborne dust after it dries. PM_{10} emissions would vary from day to day, depending on the nature and magnitude of construction activity and local weather conditions. PM10 emissions would depend on soil moisture, silt content of soil, wind speed, and the amount of operating equipment. Larger dust particles would settle near the source, while fine particles would be dispersed over greater distances from the construction site.

Water or other soil stabilizers can be used to control dust, resulting in emission reductions of 50 percent or more. The SJVAPCD has implemented Regulation VIII measures for reducing fugitive dust emissions (PM_{10}). With the implementation of Regulation VIII measures, fugitive dust emissions from construction activities would not result in adverse air quality impacts.

In addition to dust-related PM_{10} emissions, heavy trucks and construction equipment powered by gasoline and diesel engines would generate CO, SO_2, NO_x, ROG, and some soot particulate ($PM_{2.5}$ and PM_{10}) in exhaust emissions. If construction activities were to increase traffic congestion in the area, CO and other emissions from traffic would increase slightly while those vehicles idle in traffic. These emissions would be temporary in nature and limited to the immediate area surrounding the construction site.

The SJVAPCD has established construction emissions thresholds on an annual basis as shown in Table 1 below. Construction emissions for the proposed project were analyzed using the California Emissions Estimator Model (CalEEMod) version 2022.1.

Construction of the proposed project is anticipated to begin in June 2023 and continue for a period of 10 months. This analysis assumes the use of Tier 2 construction equipment. Construction of the proposed project would include the export of 5,999 cubic yards of material, which is included in this analysis. Other precise details of construction activities are unknown at this time; therefore, default assumptions (e.g., construction worker and truck trips and fleet activities) from CalEEMod were used. Construction-related emissions are presented in Table 1. CalEEMod output sheets are included in Appendix A.

Table 1: Project Construction Emissions (Tons per Year)

Construction Year	ROG	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
2023	0.1	1.7	1.3	<0.1	0.2	0.1
2024	0.3	0.6	0.5	<0.1	<0.1	<0.1
Maximum Annual Construction Emissions	**0.3**	**1.7**	**1.3**	**<0.1**	**0.2**	**0.1**
SJVAPCD Significance Threshold	10.0	10.0	100.0	27.0	15.0	15.0
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

Source: LSA (February 2023).
CO = carbon monoxide
NO_X = nitrogen oxides
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
PM_{10} = particulate matter less than 10 microns in size
ROG = reactive organic gas
SJVAPCD = San Joaquin Valley Air Pollution Control District
SO_X = sulfur oxides

As shown in Table 1, construction emissions would not exceed the SJVAPCD threshold for annual construction emissions for the proposed project. In addition to the construction period thresholds of significance, the SJVAPCD has implemented Regulation VIII measures for dust control during construction. These control measures are intended to reduce the amount of PM_{10} emissions during the construction period. Implementation of the fugitive dust control measures outlined in Mitigation Measure AIR-1 would ensure that the proposed project complies with Regulation VIII and further reduces the short-term construction period air quality impacts. Therefore, with implementation of Mitigation Measure AIR-1, construction of the proposed project would result in a less-than-significant impact related to a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or State AAQS.

Long-Term Operational Emissions. Long-term air pollutant emission impacts associated with the proposed project are those related to mobile sources (e.g., vehicle trips), energy sources (e.g., electricity and natural gas), and area sources (e.g., architectural coatings and the use of landscape maintenance equipment).

PM_{10} emissions result from running exhaust, tire and brake wear, and the entrainment of dust into the atmosphere from vehicles traveling on paved roadways. Entrainment of PM_{10} occurs when vehicle tires pulverize small rocks and pavement and the vehicle wakes generate airborne dust. The contribution of tire and brake wear is small

compared to the other PM emission processes. Gasoline-powered engines have small rates of particulate matter emissions compared with diesel-powered vehicles.

Energy source emissions result from activities in buildings for which natural gas is used. The quantity of emissions is the product of usage intensity (i.e., the amount of natural gas) and the emission factor of the fuel source.

Typically, area source emissions consist of direct sources of air emissions located at the project site, including architectural coatings and the use of landscape maintenance equipment. Area source emissions associated with the project would include emissions from the use of landscaping equipment and the use of consumer products.

Emission estimates for operation of the proposed project were calculated using CalEEMod. Model results are shown in Table 2. Trip generation rates for the proposed project were based on the project's trip generation estimate, as identified in Section XVII, Transportation. As discussed in Section XVII, Transportation, the proposed project would generate approximately 311 average daily trips.

The primary emissions associated with the proposed project are regional in nature, meaning that air pollutants are rapidly dispersed on release or, in the case of vehicle emissions associated with the proposed project; emissions are released in other areas of the Air Basin. The annual emissions associated with project operational trip generation, energy, and area sources are identified in Table 2.

Table 2: Project Operation Emissions (Tons per Year)

	ROG	NO_X	CO	SO_x	PM_{10}	$PM_{2.5}$
Mobile Source Emissions	0.2	0.2	1.3	<0.1	0.1	<0.1
Area Source Emissions	0.5	<0.1	0.4	<0.1	<0.1	<0.1
Energy Source Emissions	<0.1	0.1	<0.1	<0.1	<0.1	<0.1
Total Project Operation Emissions	**0.7**	**0.3**	**1.7**	**<0.1**	**0.1**	**<0.1**
SJVAPCD Significance Threshold	10.0	10.0	100.0	27.0	15.0	15.0
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

Source: LSA (February 2023).
CO = carbon monoxide
NO_X = nitrogen oxides
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
PM_{10} = particulate matter less than 10 microns in size
ROG = reactive organic gas
SJVAPCD = San Joaquin Valley Air Pollution Control District
SO_X = sulfur oxides

The results shown in Table 2 indicate the proposed project's operational emissions would not exceed the significance criteria for annual CO, NO_x, ROG, SO_x, PM_{10}, or $PM_{2.5}$ emissions. Therefore, operation of the proposed project would not result in a cumulatively considerable net increase of any criteria pollutant for which the proposed project region is in non-attainment under an applicable federal or State AAQS. As a result, impacts would be less than significant with mitigation.

c) Expose sensitive receptors to substantial pollutant concentrations?

Sensitive receptors are defined by the SJVAPCD as people that have an increased sensitivity to air pollution or environmental contaminants.[5] Sensitive receptor locations include schools, parks and playgrounds, day care centers, nursing homes, hospitals, and residential dwelling units. The nearest sensitive receptors include single-family residences located approximately 65 feet west of the project site across North Abby Street.

Construction of the proposed project may expose surrounding sensitive receptors to airborne particulates, as well as a small quantity of construction equipment pollutants (i.e., usually diesel-fueled vehicles and equipment). However, construction contractors would be required to implement measures to reduce or eliminate emissions by following the Regulation VIII, Fugitive PM_{10} Prohibitions as required by Mitigation Measure AIR-1. Project construction emissions would be below the SJVAPCD significance thresholds. Once the proposed project is constructed, the proposed project would not be a significant source of long-term operational emissions. Therefore, sensitive receptors would not be exposed to substantial pollutant concentrations during project operation. Impacts would be less than significant with mitigation.

d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

During construction, the various diesel-powered vehicles and equipment in use on the site would create localized odors. These odors would be temporary and are not likely to be noticeable for extended periods of time beyond the project site. The potential for diesel odor impacts is therefore considered less than significant. In addition, the proposed uses that would be developed within the project site are not expected to produce any offensive odors that would result in frequent odor complaints. The proposed project would not create objectionable odors affecting a substantial number of people during project construction or operation, and this impact would be less than significant. No mitigation is required.

Mitigation Measures

Mitigation Measure AIR-1: Consistent with SJVAPCD Regulation VIII (Fugitive PM_{10} Prohibitions), the following controls are required to be included as specifications for the proposed project and implemented at the construction site:

- All disturbed areas, including storage piles, which are not being actively utilized for construction purposes, shall be effectively stabilized of dust emissions using water, chemical stabilizer/suppressant, covered with a tarp or other suitable

5 SJVAPCD, 2015. *Final Draft -- Guidance for Assessing and Mitigating Air Quality Impacts.* February 19.

cover or vegetative ground cover.

- All on-site unpaved roads and off-site unpaved access roads shall be effectively stabilized of dust emissions using water or chemical stabilizer/suppressant.

- All land clearing, grubbing, scraping, excavation, land leveling, grading, cut and fill, and demolition activities shall be effectively controlled of fugitive dust emissions utilizing application of water or by presoaking.

- When materials are transported off site, all material shall be covered, or effectively wetted to limit visible dust emissions, and at least 6 inches of freeboard space from the top of the container shall be maintained.

- All operations shall limit or expeditiously remove the accumulation of mud or dirt from adjacent public streets at the end of each workday. (The use of dry rotary brushes is expressly prohibited except where preceded or accompanied by sufficient wetting to limit the visible dust emissions. Use of blower devices is expressly forbidden).

- Following the addition of materials to, or the removal of materials from, the surface of out-door storage piles, said piles shall be effectively stabilized of fugitive dust emission utilizing sufficient water or chemical stabilizer/suppressant.

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
IV. BIOLOGICAL RESOURCES – Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?		X		
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?			X	
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				X
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?		X		

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				X
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?				X

DISCUSSION

LSA conducted a Biological Resources Assessment (BRA)[6] to assess potential impacts of the proposed project on biological resources (included as Appendix B). The following summarizes the resources and methods used to assess the project site, and findings of the BRA.

Environmental Setting. The project site lies within the San Joaquin Valley, is flat with little topographic variation and is at approximately 352 feet above mean sea level in elevation. There are no drainage features, depressional wetlands, or riparian areas present in the project site or immediate surroundings. The project site is currently undeveloped and contains one transformer/pad and a fire hydrant from the previous development. According to historic aerial imagery, the project site was previously developed as Boomers Park (a family entertainment park) from approximately 1998 to 2017. In 2017, Boomers Park was demolished/cleared and the site has remained in its current condition since 2017. Adjacent parcels consist of North Abby Street to the west, a Kohl's department store to the north, SR 41 to the east, and a Home Depot store to the south. Some lands in the vicinity of the project site are fallow/vacant lots; however, most of the lands are developed with a mixture of commercial developments, schools, and residential uses. There are no undisturbed open spaces in the vicinity of the project site. The vegetation existing on the site appears to be regularly maintained. There are a few small and immature Mexican fan palm (Washingtonia robusta; non-native species) and interior live oak (Quercus wislizeni) trees located along the fence line of the southern perimeter of the project site.

6 LSA, 2023. Biological Resources Assessment for the Proposed Living Spaces Project located in City of Fresno, Fresno County, California. March 8.

Literature Review and Records Search. A literature review and records search was conducted on January 18, 2023, to identify the existence and potential for occurrence of sensitive or special-status plant and animal species in the project vicinity. Database records reviewed included the following:

- ***California Natural Diversity Data Base information (CNDDB – RareFind 5)***, which is administered by the California Department of Fish and Wildlife (CDFW), formerly known as the California Department of Fish and Game. This database covers sensitive plant and animal species, as well as sensitive natural communities that occur in California. Records from nine USGS quadrangles surrounding the project area (*Gregg, Lanes Bridge, Friant, Herndon, Fresno North, Clovis, Malaga, Fresno South and Kearney Park*), along with a query of records within a 5-mile radius of the project site, were obtained from this database to inform the field survey.
- ***California Native Plant Society's (CNPS) Electronic Inventory of Rare and Endangered Vascular Plants***, which uses four specific categories or "lists" of sensitive plant species to assist with the conservation of rare or endangered botanical resources. Records from the nine USGS quadrangles surrounding the project site were obtained from this database to inform the field survey.
- ***United States Fish and Wildlife Service's (USFWS) Information for Planning and Conservation (IPaC) Online System***, which lists all proposed, candidate, threatened, and endangered species managed by the Endangered Species Program of the USFWS that have the potential to occur on or near a particular site. This database also lists all designated critical habitats, national wildlife refuges, and migratory birds that could potentially be impacted by activities from a proposed project. An IPaC Trust Resource Report (USFWS 2023a) was generated for the project site.
- ***Designated and Proposed USFWS Critical Habitat Polygons*** were reviewed to determine whether critical habitat has been designated or proposed within or in the vicinity of the project site (USFWS 2023b).
- ***The USFWS National Wetlands Inventory*** was reviewed to determine whether any wetlands or surface waters of the United States have been previously identified in the survey area (USFWS 2023c).
- ***eBird:*** eBird is a real-time, online checklist program launched in 2002 by the Cornell Lab of Ornithology and National Audubon Society. It provides rich data sources for basic information on bird abundance and distribution at a variety of spatial and temporal scales. eBird occurrence records within the project sites and a 5-mile radius around the project site were reviewed in January 2023 (eBird 2023).

In addition to the databases listed above, historic and current aerial imagery, as well as local land use policies related to biological resources were reviewed, including Fresno General Plan Policies POSS-5-a through POSS-5-g, POSS-6-a and POSS-6-b which relate to protection and conservation of sensitive and special-status habitats and species in the Planning Area, and Fresno Municipal Code Article 23, Landscape, which describes the City's tree protection guidelines, tree removal permit and application

requirements.

Field Investigation. A general biological survey of the project site was conducted by an LSA Biologist on January 19, 2023. The project site was surveyed on foot, and all biological resources observed were noted and mapped.

Findings. The project site is strictly upland in nature with dominant vegetation consisting of disturbed non-native grassland. Ongoing soil disturbance and the resulting competitive exclusion by invasive nonnative plants limit the potential for native flora to occur in the project site. No native or special-status vegetation communities exist in the project site.

No riparian habitat exists in the project site or on adjacent parcels and there are no depressional wetlands (e.g., vernal pools) or natural drainage features within the project site. The project site does not serve as a wildlife nursery or as a wildlife migration corridor.

A total of seven wildlife species were observed on or near the project site during the January 2023 survey, including: American crow (Corvus brachyrhynchos), house finch (Haemorhous mexicanus), white-crowned sparrow (Zonotrichia leucophrys), black phoebe (Sayornis nigricans), California scrub jay (Aphelocoma californica), European starling (Sturnus vulgaris; nonnative species), and California ground squirrel (Otospermophilus beecheyi). Each of the wildlife species observed commonly occur in and around developed areas throughout the San Joaquin Valley. Migratory bird species may utilize the project site for foraging; however, the usage is likely transient and limited to species that forage over open areas.

The literature review identified 14 special-status plant species that are known to occur within a nine-quad radius of the project site. However, based on site observations coupled with the habitat suitability analysis, no special-status plant species are expected to occur within the project site. It is also unlikely that any source populations exist in adjacent or nearby parcels.

While no special-status animal species (or signs of such species) were observed on site during the January 2023 survey, California ground squirrel burrows that could be used by burrowing owl (Athene cunicularia) were observed in portions of the project site. None of the burrows observed in the project site exhibited features typical of occupied burrowing owl burrows at the time of the survey, although there is some potential for use by this species in the future. Potentially significant direct and/or indirect impacts, including mortality, harassment, or other forms of incidental take, could occur if construction-related ground disturbance occurs in or around an occupied burrow.

While only limited habitat for tree, shrub and ground-nesting birds exists on the project site, birds using the project site and immediate surroundings could be subjected to indirect disturbances during construction. Nesting birds are protected under the

California Fish and Game Code. Construction activities that occur during the nesting bird season (typically February 15 through September 15) have potential to result in the direct or indirect take of nesting birds.

a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service?

The project site is located in City of Fresno, is approximately 8 acres in size, and is currently vacant and disturbed. The project site is surrounded by commercial and residential uses. The project site does not contain critical habitat that could support candidate, sensitive or special-status species. Furthermore, no special-status species have been identified within the project site or in the vicinity of the site. However, the project site has limited nesting habitat for burrowing owl (Athene cunicularia). As such, project implementation could potentially impact burrowing owl. If unmitigated or unavoidable, these potential impacts on burrowing owl could be considered potentially significant. Therefore, implementation of Mitigation Measure BIO-1, which would require conducting pre-construction surveys and implementing measures such as avoidance, den excavation and passive relocation, would prevent or compensate for impacts on special-status species. Therefore, the proposed project would have a less-than-significant impact with implementation of Mitigation Measures BIO-1 related to a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service.

b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service?

Habitat values of the urban site have been severely diminished due to periodic site disturbance, scarcity of vegetation, and perimeter chain-link fencing. Review of historic and current aerial imagery of the project area, as well as the field survey conducted at the project site for the BRA determined that no riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulation by the CDFW or United States Fish and Wildlife Service's (USFWS) are present on the site.[7] Designated critical habitat, sensitive natural communities, and other sensitive habitats are absent from the project site and adjacent lands. Therefore, implementation of the proposed project would have a less than significant

[7] LSA, 2023. Biological Resources Assessment for the Proposed Living Spaces Project located in City of Fresno, Fresno County, California. March 8.

impact related to a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service.

c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

No aquatic resources occur within the project site, or within the vicinity of the project site. As a result, no impact would occur related to a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.

d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

The project site does not contain any features that would function as wildlife movement corridors for resident or migratory wildlife species. Additionally, existing chain-link fencing surrounding the project site limits the movement of wildlife species on the site. However, the project site does contain suitable nesting habitat for a few urban adapted native avian species. The on-site Mexican fan palms and interior live oaks trees have the potential to support a variety of tree-nesting birds, while existing burrows on the site have the potential to support ground-nesting birds such as the burrowing owl. Nearly all native birds are protected by the Federal Migratory Bird Treaty Act, the California Migratory Bird Protection Act, and the California Fish and Game Code. Construction activities that occur during the nesting bird season (typically February 15 through September 15) have potential to result in the mortality/disturbance of nesting birds. Therefore, implementation of Mitigation Measure BIO-1, which requires preparation of a burrowing owl preconstruction survey, establishing buffers and avoidance of active nests, would effectively mitigate any impacts on burrowing owls to less-than-significant levels. Additionally, with implementation of Mitigation Measure BIO-2, which requires conduction of a pre-construction survey prior vegetation removal and construction occurring during bird nesting season (February 15 through September 15), as well as implementation of buffer zones around active nests, the proposed project would have a less-than-significant impact related to substantially interfering with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impeding the use of native wildlife nursery sites.

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Although the proposed project is subject to provisions of the City's Municipal Code regarding trees on public property (Article 3 of Chapter 13 of the City of Fresno Municipal Code), the proposed project does not conflict with any of the existing ordinances related to tree preservation and protection. The two existing trees to be removed from the project site do not fall under the category of "Protected Trees" as defined in Section 15-2308 (C) of the Municipal Code. Additionally, the Project Applicant would comply with the requirements of the tree removal permit application as required by the City. Furthermore, the BRA prepared for the proposed project assessed the proposed project's compliance with Fresno General Plan policies related to protection of biological resources, and determined that the project would not conflict with local policies or ordinances protecting biological resources. As a result, no impact would occur related to local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

The PG&E San Joaquin Valley Operation and Maintenance (O&M) Habitat Conservation Plan (HCP) was approved in 2007 and covers portions of nine counties, including Fresno County. This HCP covers PG&E activities which occur as a result of ongoing O&M that would have an adverse impact on any of the 65 covered species and provides incidental take coverage from the USFWS and CDFW. The City of Fresno Planning Area is not located within the boundaries of any approved or draft Habitat Conservation Plan (HCP), Natural Community Conservation Plan (NCCP), or other adopted local, regional or state HCP.

Therefore, the project would not conflict with the provisions of the PG&E O&M HCP, or any other an adopted HCP or NCCP and the proposed project and would have no impact.

Mitigation Measures

Mitigation Measure BIO-1: A preconstruction clearance survey shall be required for burrowing owl no more than 30 calendar days prior to initiation of project activities. All survey results shall be delivered to the City of Fresno. If an active burrowing owl burrow is found within the project site, the Project Applicant shall coordinate with CDFW to obtain applicable agency approval/direction prior to any ground disturbance activities on the site. Specific avoidance, den excavation, passive relocation, and compensatory mitigation activities shall be performed as required by CDFW. If no active burrowing owl burrows are identified, project activities may proceed as planned following the preconstruction survey.

Mitigation Measure BIO-2: If vegetation removal, construction, or grading activities are planned to occur within the active nesting bird season (February 15 through

September 15), a qualified biologist shall conduct a preconstruction nesting bird survey no more than 5 days prior to the start of such activities. The nesting bird survey shall include the project site and areas immediately adjacent to the site that could potentially be affected by project-related activities such as noise, vibration, increased human activity, and dust, etc. For any active nest(s) identified, the qualified biologist shall establish an appropriate buffer zone around the active nest(s). The appropriate buffer shall be determined by the qualified biologist based on species, location, and the nature of the proposed activities. Project activities shall be avoided within the buffer zone until the nest is deemed no longer active by the qualified biologist. Documentation of all survey results shall be provided to the City.

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

DISCUSSION

A Cultural Resources Survey[8] was prepared for the proposed project by LSA Associate/Senior Archaeologist Kerrie Collison, M.A., Registered Professional Archaeologist (RPA) No. 28731436 (included as Appendix C). The Cultural Resources Survey included: (1) a records search at the California Historical Resources Information System (CHRIS) Southern San Joaquin Valley Information Center (SSJVIC) to identify prior cultural resource studies and previously recorded cultural resources in the project area and surrounding 0.5-mile area; (2) a search of the NAHC's Sacred Lands File; (3) additional background research including a review of aerial photographs and historic-period maps that include the project site; and (4) a pedestrian field survey of the project area to identify potential historical resources within the project area. The analysis in this Cultural Resources section is based on the results of the Cultural Resources Survey.

a) Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?

A historical resource defined by CEQA includes one or more of the following criteria: (1) the resource is listed, or found eligible for listing in, the California Register of Historical Resources; (2) listed in a local register of historical resources as defined by Public Resources Code (PRC) Section 5020.1(k); (3) identified as significant in a historical resources survey meeting the requirements of PRC Section 5024.1(g); or 4) determined to be a historical resource by the project's lead agency (PRC Section 21084.1; *State*

8 LSA, 2023. *Cultural Resources Survey Study for the Living Spaces Project in Fresno, Fresno County, California (LSA Project No. LSP2201)*. March 7.

CEQA Guidelines Section 15064.(a)). Under CEQA, historical resources include built-environment resources and archaeological sites.

As discussed in the Cultural Resources Survey, no historical resources were identified within or adjacent to the project site. The project site has remnant fire hydrants and utility access boxes leftover from a previous use (Boomers Park) that has since been removed from the project site. Boomers Park was constructed between 1984 and 1998 and as such, does not represent a historical resource. Additionally, the field survey conducted at the project site did not identify archeological resources on-site. Although the project site is disturbed and no evidence of archeological deposits has been identified, there is a potential for unknown archaeological resources that qualify as a historical resource under CEQA to be discovered during construction. In addition, the City has determined that impacts to cultural resources could occur as a result of development within the City, and that unknown archaeological materials constituting historical resources have the potential to be present. Mitigation Measure CUL-1 requires that if unknown historical resources are discovered during construction, work in the area would halt, and a qualified historical resources professional would be contacted and consulted regarding how to appropriately address the situation. This would minimize or eliminate any potential for a change to the significance of any discovered resources. Therefore, adherence to the requirements in Mitigation Measure CUL-1 would reduce potential impacts related to a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5 to less than significant with mitigation.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?

According to the State CEQA Guidelines, “When a project will impact an archaeological site, a lead agency shall first determine whether the site is an historical resource” (State CEQA Guidelines Section 15064.5(c)(1)). Those archaeological sites that do not qualify as historical resources shall be assessed to determine if these qualify as “unique archaeological resources” (California PRC Section 21083.2). A records search prepared for the project’s Cultural Resources Survey identified that seven previously conducted cultural resources studies that included the project site or land within a 0.5-mile of the project site did not identify and record any significant historical or archeological resources. Additionally, in the February 10, 2023 archeological field survey conducted at the project site, an LSA archaeologist did not identify archeological resources on-site. However, as identified in the Fresno General Plan, there is potential for unknown archaeological resources to be discovered during project construction. Mitigation Measure CUL-2 requires that if unknown archaeological resources are discovered during construction of the proposed project, work in the area would halt and a qualified archaeologist would be consulted. Therefore, adherence to the requirements in Mitigation Measure CUL-2 would reduce potential impacts to archaeological resources to less than significant.

c) Disturb any human remains, including those interred outside of formal cemeteries?

Disturbance of human remains interred outside of formal cemeteries would result in a significant impact. If human remains are identified during project construction, Section 7050.5 of the California Health and Safety Code and Section 5097.98 of the Public Resources Code shall apply, as appropriate. In addition, the project would comply with Mitigation Measure CUL-3, which requires notifying the County Coroner and other relevant parties in the event that human remains are found during construction of the proposed project. Therefore, adherence to the requirements in Mitigation Measure CUL-3 would reduce potential impacts to unknown human remains to less than significant.

Mitigation Measures

Mitigation Measure CUL-1: If previously unknown resources are encountered before or during grading activities, construction shall stop in the immediate vicinity of the find and a qualified historical resources specialist shall be consulted to determine whether the resource requires further study. The qualified historical resources specialist shall make recommendations to the City on the measures that shall be implemented to protect the discovered resources, including but not limited to excavation of the finds and evaluation of the finds in accordance with Section 15064.5 of the CEQA Guidelines and the City's Historic Preservation Ordinance. If the resources are determined to be unique historical resources as defined under Section 15064.5 of the CEQA Guidelines, measures shall be identified by the monitor and recommended to the Lead Agency. Appropriate measures for significant resources could include avoidance or capping, incorporation of the site in green space, parks, or open space, or data recovery excavations of the finds.

No further grading shall occur in the area of the discovery until the Lead Agency approves the measures to protect these. Any historical artifacts recovered as a result of mitigation shall be provided to a City-approved institution or person who is capable of providing long-term preservation to allow future scientific study.

Mitigation Measure CUL-2: In the event that buried prehistoric archaeological resources are discovered during excavation and/or construction activities, construction shall stop in the immediate vicinity of the find and a qualified archaeologist shall be consulted to assess the nature and significance of the find and determine whether the resource requires further study. The qualified archaeologist shall make recommendations to the City on the measures that shall be implemented to protect the discovered resources pursuant to California Code of Regulations [CCR], Title 14, Chapter 3, Section 15064.5(f))., including but not limited to collection and documentation of artifacts, documentation of the cultural resources on State of California Department of Parks and Recreation Series 523 forms, or subsurface testing.

If determined appropriate by the qualified archaeologist, archaeological monitoring shall commence and continue until grading and excavation are complete or until the monitoring archaeologist determines, based on field observations and in consultation with the qualified archaeologist, that there is little likelihood of encountering additional archaeological cultural resources. Archaeological monitoring may be reduced from full-time to part-time or spot-checking if determined appropriate by the qualified archaeologist based on monitoring results. Upon completion of any monitoring activities, the archaeologist shall prepare a report to document the methods and results of monitoring activities. The final version of this report shall be submitted to the SSJVIC.

If the found resources are determined to be unique prehistoric archaeological resources as defined under Section 15064.5 of the CEQA Guidelines, mitigation measures shall be identified by the monitor and recommended to the Lead Agency. Appropriate measures for significant resources could include avoidance or capping, incorporation of the site in green space, parks, or open space, or data recovery excavations of the finds. No further grading shall occur in the area of the discovery until the Lead Agency approves the measures to protect these resources. Any prehistoric archaeological artifacts recovered as a result of mitigation shall be provided to a City-approved institution or person who is capable of providing long-term preservation to allow future scientific study.

Mitigation Measure CUL-3: In the event that human remains are unearthed during excavation and grading activities of any future development project, all activity shall cease immediately. Pursuant to Health and Safety Code (HSC) Section 7050.5, no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98(a). If the remains are determined to be of Native American descent, the coroner shall within 24 hours notify the Native American Heritage Commission (NAHC). The NAHC shall then contact the most likely descendent of the deceased Native American, who shall then serve as the consultant on how to proceed with the remains. Pursuant to PRC Section 5097.98(b), upon the discovery of Native American remains, the landowner shall ensure that the immediate vicinity, according to generally accepted cultural or archaeological standards or practices, where the Native American human remains are located is not damaged or disturbed by further development activity until the landowner has discussed and conferred with the most likely descendants regarding their recommendations, if applicable, taking into account the possibility of multiple human remains. The landowner shall discuss and confer with the descendants all reasonable options regarding the descendants' preferences for treatment.

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

DISCUSSION

a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

The proposed project would increase the demand for electricity, natural gas, and gasoline. The discussion and analysis provided below is based on data included in the CalEEMod output, which is included in Appendix A.

Construction-Period Energy Use. The anticipated construction schedule assumes that the proposed project would be built over approximately 10 months. The proposed project would require grading, site preparation, and building activities during construction.

Construction of the proposed project would require energy for the manufacture and transportation of construction materials, preparation of the site for demolition and grading activities, and construction of the proposed building and infrastructure. Petroleum fuels (e.g., diesel and gasoline) would be the primary sources of energy for these activities. Construction activities are not anticipated to result in an inefficient use of energy as gasoline and diesel fuel would be supplied by construction contractors who would conserve the use of their supplies to minimize their costs on the project. Energy usage on the project site during construction would be temporary in nature and would be relatively small in comparison to the State's available energy sources. Therefore, the proposed project would result in a less-than-significant impact during project construction.

Operational Energy Use. Energy use consumed by the proposed project would be associated with natural gas use, electricity consumption, and fuel used for vehicle and truck trips associated with the project. Energy and natural gas consumption was estimated for the project using default energy intensities by land use type in CalEEMod.

In addition, the proposed project would result in energy usage associated with gasoline and diesel to fuel project-related trips. Based on the CalEEMod analysis (included in Appendix A), the proposed project would result in approximately 667,848 vehicle miles traveled (VMT) per year. The average fuel economy for light-duty vehicles (autos, pickups, vans, and SUVs) in the United States has steadily increased from about 14.9 miles per gallon (mpg) in 1980 to 22.9 mpg in 2020.[9] The average fuel economy for heavy-duty trucks in the United States has also steadily increased, from 5.7 mpg in 2013 to a projected 8.0 mpg in 2021.[10] Therefore, using the average fuel economy estimates for 2020 and 2021 the proposed project would result in the consumption of approximately 22,900 gallons of gasoline and 17,872 gallons of diesel.

Table 3 shows the estimated potential increased electricity and natural gas demand, and fuel consumption associated with the proposed project.

Table 3: Estimated Annual Energy Use of Proposed Project

Electricity Use (kWh per year)	Natural Gas Use (therms per year)	Gasoline Consumption (gallons per year)	Diesel Fuel Consumption (gallons per year)
1,210,432	10,269	22,900	17,872

Source: LSA (February 2023).
kWh = kilowatt-hours

As shown in Table 3, the estimated potential increased electricity demand associated with the proposed project is 1,210,432 kilowatt-hours (kWh) per year. In 2021, Fresno County consumed 8,378 GWh or 8,378,047,292 kWh.[11] Therefore, electricity demand associated with the proposed project would be less than 0.1 percent of Fresno County's total electricity demand.

The estimated potential increased natural gas demand associated with the proposed project is 10,269 therms per year, as shown in Table 3. In 2021, Fresno County consumed approximately 318 million therms or approximately 318,890,506 therms.[12] Therefore, natural gas demand associated with the proposed project would only be less

9 U.S. Department of Transportation (DOT). "Table 4-23: Average Fuel Efficiency of U.S. Light Duty Vehicles." Website: https://www.bts.gov/content/average-fuel-efficiency-us-light-duty-vehicles (accessed December 2022).

10 Ibid.

11 California Energy Commission (CEC), 2021a. Energy Consumption Data Management Service. Electricity Consumption by County. Website: www.ecdms.energy.ca.gov/elecbycounty.aspx (accessed December 2022.

12 CEC, 2021b. Energy Consumption Data Management Service. Gas Consumption by County. Website: www.ecdms.energy.ca.gov/gasbycounty.aspx (accessed December 2022).

than 0.1 percent of Fresno County's total natural gas demand.

In addition, the proposed project would result in energy usage associated with gasoline and diesel to fuel project-related trips. As shown above in Table 3, vehicle trips associated with the proposed project would consume approximately 22,900 gallons of gasoline and 17,872 gallons of diesel fuel per year. Based on fuel consumption obtained from EMFAC2021, approximately 157 million gallons of diesel and approximately 372 million gallons of gasoline will be consumed from vehicle trips in Fresno County in 2023. Therefore, vehicle and truck trips associated with the proposed project would increase the annual fuel use in Fresno County by less than 0.1 percent for gasoline fuel usage and by less than 0.1 percent for diesel fuel usage.

In addition, proposed new development would be constructed using energy efficient modern building materials and construction practices, and the proposed project also would use new modern appliances and equipment, in accordance with the Appliance Efficiency Regulations (Title 20, CCR Sections 1601 through 1608). The expected energy consumption during construction and operation of the proposed project would be consistent with typical usage rates for commercial uses; however, energy consumption is largely a function of personal choice and the physical structure and layout of buildings.

PG&E is the private utility that would supply the proposed project's electricity and natural gas services. In 2021, a total of 50 percent of PG&E's delivered electricity came from renewable sources, including solar, wind, geothermal, small hydroelectric and various forms of bioenergy.[13] PG&E reached California's 2020 renewable energy goal in 2017, and is positioned to meet the State's 60 percent by 2030 renewable energy mandate set forth in Senate Bill (SB) 100. In addition, PG&E plans to continue to provide reliable service to their customers and upgrade their distribution systems as necessary to meet future demand.

Therefore, the proposed project would result in a less-than-significant impact during project operation. As such, the proposed project would not result in a potential significant impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation. No mitigation is required.

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

In 2002, the Legislature passed Senate Bill 1389, which required the California Energy Commission (CEC) to develop an integrated energy plan every two years for electricity, natural gas, and transportation fuels, for the California Energy Policy Report. The plan

[13] PG&E, 2021. *Exploring Clean Energy Solutions*. https://www.pge.com/en_US/about-pge/environment/what-we-are-doing/clean-energy-solutions/clean-energy-solutions.page?WT.mc_id=Vanity_cleanenergy (accessed December 2022).

calls for the State to assist in the transformation of the transportation system to improve air quality, reduce congestion, and increase the efficient use of fuel supplies with the least environmental and energy costs. To further this policy, the plan identifies a number of strategies, including assistance to public agencies and fleet operators in implementing incentive programs for zero emission (ZE) vehicles and their infrastructure needs, and encouragement of urban designs that reduce VMT and accommodate pedestrian and bicycle access.

The most recently CEC adopted energy reports are the 2021 Integrated Energy Policy Report[14] and 2022 Integrated Energy Policy Report Update[15]. The Integrated Energy Policy Reports provide the results of the CEC's assessments of a variety of energy issues facing California. Many of these issues will require action if the State is to meet its climate, energy, air quality, and other environmental goals while maintaining energy reliability and controlling costs. The Integrated Energy Policy Reports cover a broad range of topics, including implementation of Senate Bill 350, integrated resource planning, distributed energy resources, transportation electrification, solutions to increase resiliency in the electricity sector, energy efficiency, transportation electrification, barriers faced by disadvantaged communities, demand response, transmission and landscape-scale planning, the California Energy Demand Preliminary Forecast, the preliminary transportation energy demand forecast, renewable gas (in response to Senate Bill 1383), updates on Southern California electricity reliability, natural gas outlook, and climate adaptation and resiliency.

As indicated above, the proposed project would not result in wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation. Because California's energy conservation planning actions are conducted at a regional level, and because the proposed project's total impact to regional energy supplies would be minor, the proposed project would not conflict with California's energy conservation plans as described in the CEC's Integrated Energy Policy Reports. Impacts would be less than significant, and no mitigation is required.

Mitigation Measures

The proposed project would not result in any potentially significant impacts related to energy, and no mitigation is required.

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

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

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VII. GEOLOGY AND SOILS – Would the project:				
a) Directly or Indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.				X
ii) Strong seismic ground shaking?			X	
iii) Seismic-related ground failure, including liquefaction?			X	
iv) Landslides?			X	
b) Result in substantial soil erosion or the loss of topsoil?			X	
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?			X	
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?			X	

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?				X
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?			X	

DISCUSSION

a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

Fault rupture is generally expected to occur along active fault traces that have exhibited signs of recent geological movement (i.e., 11,000 years). Alquist-Priolo Earthquake Fault Zones delineate areas around active faults with potential surface fault rupture hazards that would require specific geological investigations prior to approval of certain kinds of development within the delineated area. The project site is not located within an Alquist-Priolo Earthquake Fault Zone. In addition, no known active or potentially active faults or fault traces are located in the project vicinity. As a result, the proposed project would have no impact related to rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault would occur. No mitigation is required.

ii. Strong seismic ground shaking?

The City of Fresno is located in an area with historically low to moderate level of seismicity. However, strong ground shaking could occur within the project site during seismic events and occurrences have the possibility to result in

significant impacts. Major seismic activity along the nearby Great Valley Fault Zone or the Nunez Fault, or other associated faults, could affect the project site through strong seismic ground shaking. Strong seismic ground shaking could potentially cause structural damage to the proposed project. However, due to the distance to the known faults, hazards due to ground shaking would be minimal. In addition, compliance with the California Building Code (Title 24 CCR) would ensure that geotechnical design of the proposed project would minimize or eliminate potential impacts related to strong seismic ground shaking. Therefore, the project would not directly or indirectly cause substantial adverse effects related to strong seismic ground shaking. As such, the proposed project would have a less-than-significant impact. No mitigation is required.

iii. Seismic-related ground failure, including liquefaction?

Soil liquefaction is a phenomenon primarily associated with saturated soil layers located close to the ground surface. During ground shaking, these soils lose strength and acquire “mobility” sufficient to permit both horizontal and vertical movements. Soils that are most susceptible to liquefaction are clean, loose, uniformly graded, saturated, fine-grained sands that lie relatively close to the ground surface. However, loose sands that contain a significant amount of fines (silt and clay) may also liquefy. Based on the predicted seismic accelerations, and soil and groundwater conditions typically encountered in the region, general liquefaction potential is low in the City of Fresno. Additionally, compliance with the Fresno Municipal Code and the California Building Code would ensure potential impacts associated with seismic-related ground failure, including liquefaction, would not directly or indirectly cause substantial adverse effects. Therefore, the proposed project’s impacts would be less than significant. No mitigation is required.

iv. Landslides?

A landslide generally occurs on relatively steep slopes and/or on slopes underlain by weak materials. The project site is located on a relatively flat area and is not located next to any hills. Although there is an existing grade separation between the project site and SR 41 east of the project site, given the distance between SR41 and the property line (approximately 66 feet), the relative slightness of the existing slope and compacted nature of the soil that underlies the highway infrastructure, the project site is not expected to be affected by landslides stemming from this incline. In general, the potential for land sliding or slope failure in Fresno is very low and the project site would not be susceptible to landslides. Therefore, the proposed project would not directly or indirectly cause substantial adverse effects by exposing people or structures to risk as a result of landslides. As such, the proposed project’s impacts would be less than significant.

b) Result in substantial soil erosion or the loss of topsoil?

The total project site is 8 acres, which would be disturbed/developed during proposed grading and construction activities. Grading and earthmoving during project construction has the potential to result in erosion and loss of topsoil. Exposed soils could be entrained in stormwater runoff and transported off the project site. However, this impact would not be substantial because the project is required to comply with water quality control measures, which include preparation of a Stormwater Pollution Prevention Plan (SWPPP) (refer to Section X, Hydrology and Water Quality). Although designed primarily to protect stormwater quality, the SWPPP would incorporate Best Management Practices (BMPs) to minimize erosion. Additional details regarding the SWPPP are provided in Section X, Hydrology and Water Quality, of this Initial Study. Impacts related to substantial soil erosion or the loss of topsoil would be less than significant. No mitigation is required.

c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

As described in discussion a) in this section, soils on the project site would not be subject to liquefaction, lateral spreading, or landslides. Additionally, the proposed project would be required to conform with the California Building Code (CBC), which establishes building and construction design standards and requirements based on project location, proposed occupancy type at the project site, soil characteristics, and other site-specific characteristics. Implementation of the CBC would reduce risks related to unstable soils, including threats to the stability and security of structures and the safety of the people occupying them. Therefore, the proposed project would have a less-than-significant impact related to the potential to be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. No mitigation is required.

d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994, as updated), creating substantial direct or indirect risks to life or property?

Expansive soils are characterized by the potential for shrinking and swelling as the moisture content of the soil decreases and increases, respectively. Shrink-swell potential is influenced by the amount and type of clay minerals present and can be measured by the percent change of the soil volume. The project site is made up of San Joaquin loam (SgA), a soil with low to moderate clay content and shrink-swell

potential.[16] Compliance with the California Building Code requirements, including general building design and construction requirements relating to structural safety in the building foundation and supporting ground would ensure that geotechnical design of the proposed project would reduce potential impacts related to expansive soils to a less-than-significant level. As such, the risk of expansive soil affecting the proposed project is considered low. Impacts to expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994, as updated), creating substantial direct or indirect risks to life or property would be less than significant. No mitigation is required.

e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

The project site would be served by a wastewater conveyance system maintained by the City of Fresno. Wastewater from the City's collection system is treated at the City's wastewater treatment plant. Development of the proposed project would not involve the use of septic tanks or alternative wastewater disposal systems. Therefore, the proposed project would have no impact related to soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water.

f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

The Fresno General Plan PEIR identifies two primary surficial deposits in the Fresno Planning Area: (1) Pleistocene non-marine; and (2) Quaternary non-marine fan deposits. The Pleistocene non- marine deposits are considered to have a high potential sensitivity. The Quaternary non-marine deposits consist of Pleistocene-Holocene alluvial sediments. Since these deposits include Pleistocene sediments, they are also considered to have a high potential for sensitivity. Therefore, excavation and/or construction activities within the Planning Area that are associated with implementation of the approved Fresno General Plan has the potential to impact paleontological/geological resources during excavation and construction activities within previously undisturbed soils.

The records search and field survey prepared for the project's Cultural Resource Survey did not identify any known paleontological resources or unique geological features within or near the project site. Furthermore, the proposed project would not require excavation to depths that have not already been disturbed by previous construction. In accordance with State law, the proposed project would be required to comply with Section 5097.5 of the California PRC and California Administrative Code, Title 14, Section 4307, which state that no person shall remove, injure, deface or destroy any

[16] Natural Resources Conservation Service. Web Soil Survey. Available online at: https://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx (accessed December 2022).

object of paleontological, archaeological, or historical interest or value. Penal Code Section 622.5 establishes as a misdemeanor the willful injury, disfiguration, defacement, or destruction of any object or thing of paleontological interest or value, whether situated on private or public lands. Therefore, the proposed project is not expected to destroy a unique paleontological resource or site or unique geologic feature directly or indirectly. Impacts would be considered less than significant. No mitigation is required.

Mitigation Measures

The proposed project would not result in any potentially significant impacts related to geology and soils, and no mitigation is required.

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

DISCUSSION

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Greenhouse gas emissions (GHGs) are present in the atmosphere naturally, and are released by natural sources, or are formed from secondary reactions taking place in the atmosphere. However, over the last 200 years, human activities have caused substantial quantities of GHGs to be released into the atmosphere. These extra emissions are increasing GHG concentrations in the atmosphere, and enhancing the natural greenhouse effect, which is believed to be causing global climate change. The gases that are widely seen as the principal contributors to human-induced global climate change are[17]:

- Carbon dioxide (CO_2)
- Methane (CH_4)
- Nitrous oxide (N_2O)
- Hydrofluorocarbons
- Perfluorocarbons
- Sulfur Hexafluoride

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

[17] City of Fresno, 2021. Fresno General Plan Program Environmental Impact Report. pg. 4.8-3. September 30.

processes, such as oceanic evaporation.

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

The GWP of each gas is measured relative to CO_2, the most abundant GHG; the definition of GWP for a particular GHG is the ratio of heat trapped by one unit mass of the GHG to the ratio of heat trapped by one unit mass of CO_2 over a specified time period. GHG emissions are typically measured in terms of pounds or tons of "CO_2 equivalents" (CO_2e).

The *State CEQA Guidelines* indicate that a project would normally have a significant adverse GHG emission impact if the project would:

- Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment; or

- Conflict with an applicable plan, policy, or regulation adopted for the purpose of reduction the emissions of GHGs.

Section 15064.4 of the *State CEQA Guidelines* states that: "A lead agency should make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate the amount of GHG emissions resulting from a project." In performing that analysis, the lead agency has discretion to determine whether to use a model or methodology to quantify GHG emissions, or to rely on a qualitative analysis or performance-based standards. In making a determination as to the significance of potential impacts, the lead agency then considers the extent to which the project may increase or reduce GHG emissions as compared to the existing environmental setting, whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project, and the extent to which the project complies with regulations or requirements adopted to implement a Statewide, regional, or local plan for the reduction or mitigation of GHG emissions.

Therefore, consistent with the *State CEQA Guidelines*, Section 15183.5, if a project is consistent with an adopted qualified Greenhouse Gas Reduction Strategy that meets the standards, it can be presumed that the project would not have significant GHG emission impacts.

The City of Fresno's GHG Reduction Plan was adopted in December 2014 to reduce local community GHG emissions to 1990 levels by the year 2020, consistent with the State objectives set forth in AB 32. The City's 2014 GHG Reduction Plan meets the requirements for a Qualified Greenhouse Gas Reduction Strategy and is designed to

streamline environmental review of future development projects in the City, consistent with *State CEQA Guidelines* Section 15183.5.

The City of Fresno updated its 2014 GHG Reduction Plan in the year 2021 (GHG Reduction Plan Update) to conform with existing applicable State climate change policies and regulations to reduce local community GHG emissions to 40 percent below 1990 levels by the year 2030, consistent with the State objectives set by SB 32. The GHG Reduction Plan Update outlines strategies that the City will undertake to achieve its proportional share of GHG emission reductions. The GHG Reduction Plan Update includes a Consistency Checklist to help the City provide a streamlined review process for new development projects that are subject to discretionary review pursuant to CEQA. This analysis evaluates the proposed project's consistency with the City's GHG Reduction Plan Update.

The GHG Reduction Plan Update requires an analysis of GHG emissions to ensure that a change in land use designation would not result in a significant increase in GHG emissions compared to the existing land use designation. The proposed project would not require a change in the Fresno General Plan land use designation or the current zoning of the project site and would be consistent with the Fresno General Plan and Zoning Ordinance. Therefore, an analysis of the proposed project's estimated GHG emissions compared to maximum buildout of the existing designation would not be required.

As stated above, the GHG Reduction Plan Update includes a Consistency Checklist to help the City provide a streamlined review process for new development projects that are subject to discretionary review pursuant to CEQA. The project's Consistency Checklist is included in Appendix D. As shown in the Consistency Checklist, the proposed project would be consistent with the applicable strategies from the GHG Reduction Plan Update. Therefore, the proposed project would not generate GHG emissions, either directly or indirectly, that may have a significant effect on the environment and impacts would be less than significant.

b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

As described above, the proposed project would be consistent with the City's GHG Reduction Plan Update. Other applicable plans include the SJVAPCD's Climate Change Action Plan (CCAP), which includes suggested best performance standards (BPS) for proposed development projects. However, the SJVAPCD's CCAP was adopted in 2009 and was prepared based on the State's 2020 GHG targets, which are now superseded by State policies (i.e., the 2022 California Green Building Code) and the 2030 GHG targets, established in SB 32.

In addition, the proposed project was analyzed for consistency with the goals of Executive Order (EO) B-30-15, SB 32, AB 197, and the Scoping Plan.

EO B-30-15 added the immediate target of reducing GHG emissions to 40 percent below 1990 levels by 2030. SB 32 affirms the importance of addressing climate change by codifying into statute the GHG emissions reductions target of at least 40 percent below 1990 levels by 2030 contained in EO B-30-15. CARB released the 2017 Scoping Plan to reflect the 2030 target set by EO B-30-15 and codified by SB 32. SB 32 builds keep the State on the path toward achieving the 2050 objective of reducing emissions to 80 percent below 1990 levels. The companion bill to SB 32, AB 197, provides additional direction to the CARB related to the adoption of strategies to reduce GHG emissions. Additional direction in AB 197 intended to provide easier public access to air emissions data that are collected by CARB was posted in December 2016.

The Scoping Plan contains GHG reduction measures that work towards reducing GHG emissions, consistent with the targets set by EO B-30-15 and codified by SB 32 and AB 197. The measures applicable to the proposed project include energy efficiency measures, water conservation and efficiency measures, and transportation and motor vehicle measures, as qualitatively discussed below.

Energy efficient measures are intended to maximize energy efficiency building and appliance standards, pursue additional efficiency efforts including new technologies and new policy and implementation mechanisms, and pursue comparable investment in energy efficiency from all retail providers of electricity in California. In addition, these measures are designed to expand the use of green building practices to reduce the carbon footprint of California's new and existing inventory of buildings. The proposed project would be required to comply with the latest Title 24 standards of the CCR, established by the CEC, regarding energy conservation and green building standards. Therefore, the proposed project would comply with applicable energy measures.

Water conservation and efficiency measures are intended to continue efficiency programs and use cleaner energy sources to move and treat water. Increasing the efficiency of water transport and reducing water use would reduce GHG emissions. As noted above, the proposed project would be required to comply with the latest Title 24 standards of the CCR, which includes a variety of different measures, including reduction of wastewater and water use. In addition, the proposed project would be designed to include drought tolerant landscaping. Therefore, the proposed project would not conflict with any of the water conservation and efficiency measures.

The goal of transportation and motor vehicle measures is to develop regional GHG emissions reduction targets for passenger vehicles. The second phase of Pavley standards will reduce GHG emissions from new cars by 34 percent from 2016 levels by 2025, resulting in a 3 percent decrease in average vehicle emissions for all vehicles by 2020. Vehicles traveling to the project site would comply with the Pavley II (LEV III) Advanced Clean Cars Program. Therefore, the proposed project would not conflict with the identified transportation and motor vehicle measures.

As such, the proposed project would comply with existing State regulations adopted to achieve the overall GHG emissions reduction goals identified in EO B-30-15, SB 32, AB 197, and would be consistent with applicable plans and programs designed to reduce GHG emissions. Therefore, the proposed project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs and impacts would be less than significant. No mitigation is required.

Mitigation Measures

The proposed project would not result in any potentially significant impacts related to greenhouse gas emissions, and no mitigation is required.

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
IX. HAZARDS AND HAZARDOUS MATERIAL – Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			X	
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?			X	
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?			X	
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				X
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?			X	

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

DISCUSSION

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Construction activities associated with the proposed project would involve the use of limited amounts of potentially hazardous materials, including but not limited to, solvents, paints, fuels, oils, and transmission fluids. However, all materials used during construction would be contained, stored, and handled in compliance with applicable standards and regulations established by the Department of Toxic Substances Control (DTSC), the USEPA, and the Occupational Safety and Health Administration (OSHA).

The proposed project would include the construction of an approximately 104,867 square-foot furniture retail store in the eastern portion of the project site, associated parking on the western portion and along the northeast boundary of the site, and utility infrastructure. No uses utilizing large amounts of hazardous materials are anticipated to occur within the project site. Project operation would involve the use of small quantities of commercially available hazardous materials (e.g., paint, cleaning supplies) that could be potentially hazardous if handled improperly or ingested. However, these products are not considered acutely hazardous and are not generally considered unsafe. All storage, and handling occurring during project construction would comply with DTSC, USEPA and OSHA requirements, while routine transport and disposal of hazardous materials during project construction and operation would comply with applicable standards and regulations, including Objective NS-4, Policies NS-4-a through NS-4-g, and Policy NS-4-i of the Noise and Safety Element of the Fresno General Plan. Therefore, the proposed project would have a less-than-significant impact to the public or the environment through the routine transport, use, or disposal of hazardous materials, and no mitigation is required.

b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

As discussed in discussion a) above, all storage, and handling of hazardous materials occurring during project construction would comply with DTSC, USEPA and OSHA requirements, while routine transport and disposal of hazardous materials during project construction and operation would comply with applicable standards and regulations, including Objective NS-4, Policies NS-4-a through NS-4-g, and Policy NS-4-i of the Noise and Safety Element of the Fresno General Plan. With implementation of applicable regulations, the proposed project would not result in a significant impact to the hazard to the public or the environment through a reasonably foreseeable upset or accident condition related to the release of hazardous materials. This impact would be considered less than significant. No mitigation is required.

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

The closest existing schools include Pinedale Elementary School, located approximately 0.18-mile southwest of the project site, Lincoln Elementary School, located approximately 0.65-mile northeast of the project site, and Kastner Intermediate School, located approximately 0.75-mile northeast of the project site. As previously stated, the project consists of a commercial use that would use small quantities of commercially available hazardous materials that are not generally considered unsafe. The proposed project would not result in the use or emission of substantial quantities of acutely hazardous materials that would pose a human or environmental health risk. In addition, all materials would be handled, stored, and disposed of in accordance with applicable standards and regulations, including DTSC, USEPA and OSHA requirements and Objective NS-4, Policies NS-4-a through NS-4-g, and Policy NS-4-i of the Noise and Safety Element of the Fresno General Plan. Therefore, because the proposed project does not involve activities that would result in the emission of hazardous materials or acutely hazardous substances, implementation of the proposed project would result in a less-than-significant impact related to the potential to emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. No mitigation is required.

d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

According to the DTSC EnviroStor database,[18] the project site is not located on a federal superfund site, State response site, voluntary cleanup site, school cleanup site, evaluation site, school investigation site, military evaluation site, tiered permit site, or corrective action site. The project site is not included on the list of hazardous materials sites compiled pursuant to Government Code Section 65962.5.[19] As a result, no impact related to hazardous materials sites pursuant to Government Code Section 65962.5 would occur, and no mitigation is required.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

The nearest airports include the Sierra Sky Airport, located approximately 4.8 miles west of the project site, the Fresno Yosemite International Airport, located approximately 6 miles southeast of the project site, and the Fresno Chandler Executive Airport, located approximately 7.9 miles southwest of the project site. In addition, the nearest medical center helipads include the Saint Agnes Medical Center, located 1.22 miles southeast of the project site. The project site is not located within 2 miles of any local airports. Although the project is located within two miles of a hospital heliport, heliport operations are not expected to pose a significant hazard for people in the project area. The project is located in the Fresno County Airport Land Use Compatibility Plan within the boundaries of Fresno Yosemite International Airport, Zone 7 "Precision Approach Zone (PAZ)". Within Zone 7 (PAZ), there is generally no concern with regard to any object up to 100 feet above ground level (AGL) unless it is located on high ground or it is a solitary object (e.g., an antenna) more than 35 feet AGL.[20] The proposed project is located in a generally flat area, and would include a retail facility with a maximum height of 42 feet. Additionally, the proposed facility is located adjacent to existing commercial facilities of similar dimensions, and would not be a solitary object. As such, aircraft operations are not expected to pose a safety hazard to people working or visiting the project site. Therefore, the proposed project would result in a less-than-significant impact related to a safety hazard for people residing or working in the project area. No mitigation is required.

f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

The California Emergency Services Act requires cities to prepare and maintain an Emergency Plan for natural, manmade, or war-caused emergencies that result in

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[18] California Department of Toxic Substances Control (DTSC). 2007. EnviroStor. Website: https://www.envirostor.dtsc.ca.gov/public/map/?myaddress=fresno (accessed December 2022).

[19] California Environmental Protection Agency (CalEPA). 2018. Government Code Section 65962.5(a) Hazardous Waste and Substances Site List. Website: https://calepa.ca.gov/sitecleanup/corteselist/section-65962-5a/ (accessed December 2022).

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

conditions of disaster or in extreme peril to life. The City's full-time Emergency Preparedness Officer (EPO) is responsible for ensuring that Fresno's emergency response plans are up-to-date and implemented properly. The EPO also facilitates cooperation between City departments and other local, State and federal agencies that would be involved in emergency response operations. The City of Fresno Emergency Operations Center (EOC) serves as the coordination and communication between the City of Fresno and Fresno County Operational Area EOC. The proposed project would not result in any alterations of existing roadways. Therefore, the proposed project would not interfere with the implementation of or physically interfere with any adopted emergency response plans or emergency evacuation plan, and this impact would be less than significant. No mitigation is required.

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?

Wildland fires occur in geographic areas that contain the types and conditions of vegetation, topography, weather, and structure density susceptible to risks associated with uncontrolled fires that can be started by lightning, improperly managed campfires, cigarettes, sparks from automobiles, and other ignition sources. According to the California Department of Forestry and Fire Protection (CAL FIRE) Very High Fire Hazard Severity Zone (VHFHSZ) Map for Fresno County, the project site is not located within a High or Very High Fire Hazard Severity Zone.[21] Sparse vegetation does exist between the project site's eastern boundary and SR 41, which represents limited ignition sources in the project vicinity. Design of project access, internal circulation system, fire lanes and fire suppression features would be developed to City of Fresno standards and conditions of approval requirements. Additionally, the Fresno Fire Department (FFD) would also review the proposed development plans prior to project approval to ensure that adequate emergency access and on-site circulation are provided. Therefore, with implementation of the City's design requirements and FFD review of project plans, the proposed project would not expose people or structures to a significant loss, injury or death involving wildland fires and the impacts would be less than significant. No mitigation is required.

Mitigation Measures

The proposed project would not result in any potentially significant impacts related to hazards and hazardous materials, and no mitigation is required.

[21] Cal Fire, 2007. *Fresno County Fire Hazard Severity Zones in LRA.* Kune. Available online at: https://osfm.fire.ca.gov/media/6673/fhszl06_1_map10.pdf (accessed November 2022).

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
X. HYDROLOGY AND WATER QUALITY – Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?			X	
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?			X	
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surfaces, in a manner which would:				
i) Result in a substantial erosion or siltation on- or off-site;			X	
ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site:			X	
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or			X	
iv) impede or redirect flood flows?				X

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?			X	
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?			X	

DISCUSSION

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

The State Water Resources Control Board and nine Regional Water Quality Control Boards regulate the water quality of surface water and groundwater bodies throughout California. The proposed project is within the jurisdiction of the Central Valley Regional Water Quality Control Board (RWQCB).

Construction. Pollutants of concern during construction include sediments, trash, petroleum products, concrete waste (dry and wet), sanitary waste, and chemicals. During project construction, there would be an increased potential to expose soils to wind and water erosion, which could result in temporary minimal increases in sediment load within nearby water bodies.

Because the project would disturb greater than 1 acre of soil, it is required to comply with the State Water Resources Control Board's National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Order No. 2009-0009-DWQ, as amended by 2010-0014-DWG and 2012-0006-DWQ, NPDES No. CAS000002) (Construction General Permit). The project is also subject to Article 7, Urban Storm Water Quality Management and Discharge Control, Section 6-714, Requirement to Prevent, Control, and Reduce Storm Water Pollutants of the City's Municipal Code.

The Construction General Permit requires the preparation of a Storm Water Pollution Prevention Plan (SWPPP) and implementation of Construction Best Management Practices (BMPs). Construction BMPs would include, but not be limited to, erosion and sediment control, designed to minimize erosion and retain sediment on site, and good housekeeping practices to prevent spills, leaks, and discharge of construction debris

and waste into receiving waters. Section 6-714 of the City's Municipal Code also requires the implementation of BMPs to the maximum extent technologically and economically feasible to prevent and reduce pollutants from entering stormwater during construction. Therefore, adherence to the required SWPPP and the City's Municipal Code and implementation of construction BMPs, would reduce the potential for the discharge of pollutants into nearby water bodies during construction and impacts associated with the violation of water quality standards or waste discharge requirements would be less than significant.

During construction, it is likely that dewatering would be required. If groundwater is encountered during construction, the project would be required to obtain coverage under the California Regional Water Quality Control Board Central Valley Region National Pollution Discharge Elimination System Waste Discharge Requirements Limited Threat Discharges to Surface Water (Order R5-2022-0006, NPDES No. CAG995002). With adherence to the Waste Discharge Requirements pertaining to Limited Threat Discharges to Surface Water, project construction would not violate groundwater quality standards or waste discharge requirements and impacts would be less than significant.

Operation. Operation of the proposed project could result in surface water pollution associated with chemicals, liquid products, petroleum products (such as paints, solvents, and fuels), and waste that may be spilled or leaked and have the potential to be transported via runoff during periods of heavy precipitation into nearby water bodies.

The City of Fresno operates under the California Regional Water Quality Control Board Central Valley Regional National Pollutant Discharge Elimination System Permit and Waste Discharge Requirements General Permit for Discharges from Municipal Separate Storm Sewer Systems (MS4) (Order No. R5-2016-0040-014, NPDES No. CAS0085324). Consistent with the City of Fresno's MS4 Permit, the project would implement storm water quality controls recommended in the Fresno-Clovis Storm Water Quality Management Construction and Post-Construction Guidelines. If applicable, the project would also be subject to the Statewide General Permit for Stormwater Discharges Associated with Industrial Activities (Order 2014-0057-DWQ as amended in 2015 and 2018) (Industrial General Permit) and would be required to develop and implement a storm water pollution prevention plan, eliminate non-stormwater discharges, conduct routine site inspections, train employees in permit compliance, sample storm water runoff and test if for pollutant indicators, and submit an annual report to the State Water Resources Control Board.

Adherence to the City of Fresno's MS4 Permit, including implementation of the Stormwater Management Post-Construction Guidelines, as specified in the Industrial General Permit, would reduce the potential for the discharge of pollutants during project operations and impacts associated with the violation of water quality standards or waste discharge requirements would be less than significant.

Infiltration of stormwater could have the potential to affect groundwater quality. The majority of the project site would be impervious surface; and therefore, it is not expected that stormwater would infiltrate during project operations. Because stormwater would be collected and diverted to the storm drain system, there is not a direct path for pollutants to reach groundwater. Therefore, project operations would not violate groundwater quality standards or waste discharge requirements and impacts would be less than significant.

Conclusion. The proposed project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality. Therefore, the project's impacts would be less than significant. No mitigation is required.

b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

The City of Fresno overlies the Kings Subbasin, which is part of the greater San Joaquin Valley Groundwater Basin. Temporary dewatering from excavations could be necessary during construction. Construction-related dewatering would be temporary and limited to the area of excavations on the project site and would not substantially contribute to depletion of groundwater supplies. Operation of the project would not require groundwater extraction. Following project implementation, there would be an increase in impervious surface area. An increase in impervious surface area decreases infiltration, which can decrease the amount of water that is able to recharge the aquifer/groundwater. However, the increase in impervious area at the project site would not substantially decrease any infiltration that currently may occur in the area, as the project would include on-site stormwater infrastructure that would allow infiltration of runoff on-site, and would also collect and direct excess runoff towards inlets west and south of the project site that would direct water towards the City's drainage basins. Therefore, the project would not impede the Central Valley Regional Water Quality Control Board's ability to manage groundwater. Thus, this project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that the project would impede sustainable management of the Kings Subbasin. Impacts would be less than significant, and no mitigation is required.

Additionally, as discussed below in Section XIX, Utilities and Service Systems, the City receives its water supply from groundwater and surface water. The City has indicated that groundwater wells, pump stations, recharge facilities, water treatment and distribution systems shall be expanded incrementally to mitigate increased water demands. One of the primary objectives of Fresno's future water supply plans detailed in the City's current Urban Water Management Plan (UWMP) is to balance groundwater operations through a host of strategies. Through careful planning, Fresno has designed a comprehensive plan to accomplish this objective by increasing surface water supplies and surface water treatment facilities, intentional recharge, and conservation, thereby

reducing groundwater pumping. The City continually monitors impacts of land use changes and development project proposals on water supply facilities by assigning fixed demand allocations to each parcel by land use as currently zoned or proposed to be rezoned.

The City relies on groundwater and surface water supplies to meet water demands. In 2006, Fresno updated its Metropolitan Water Resources Management Plan designed to ensure the Fresno metro area has a reliable water supply through 2050. The plan implements a conjunctive use program, combining groundwater, treated surface water, artificial recharge, and an enhanced water conservation program.

The Fresno General Plan policies require the City to maintain a comprehensive conservation program to help reduce per capita water usage, and includes conservation programs such as landscaping standards for drought tolerance, irrigation control devices, leak detection and retrofits, water audits, public education and implementing U.S. Bureau of Reclamation Best Management Practices for water conservation to maintain surface water entitlements.

Implementation of the Fresno General Plan policies, the Kings Basin Integrated Regional Water Management Plan, the City of Fresno UWMP, the Fresno-Area Regional Groundwater Management Plan, and the City of Fresno Metropolitan Water Resource Management Plan would address the issues of providing an adequate, reliable, and sustainable water supply for the proposed project. Impacts would be less than significant, and no mitigation is required.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surfaces, in a manner which would:

i. Result in substantial erosion or siltation on- or off-site?

During construction, excavated soil would be exposed and disturbed, drainage patterns would be temporarily altered, and there would be an increased potential for soil erosion and sedimentation compared to existing conditions. Additionally, during a storm event, soil erosion and siltation could occur at an accelerated rate. As discussed previously, the Construction General Permit requires preparation of a SWPPP to identify construction BMPs to be implemented as part of the project to reduce impacts to water quality during construction, including those impacts associated with soil erosion and siltation. With compliance with the requirements in the Construction General Permit and implementation of the construction BMPs, and with compliance with the City's Municipal Code, construction impacts related to on- or off-site erosion or siltation would be less than significant.

The project would increase the amount of impervious surface, which would

increase the volume of runoff during a storm, and which can more effectively transport sediments to receiving waters. At project completion, much of the project site would be impervious surface area and not prone to on-site erosion or siltation because no exposed soil would be present in these areas. The remaining portion of the site would consist of pervious surface area, which would contain landscaping that would minimize on-site erosion and siltation by stabilizing the soil. Additionally, the Project Applicant would be required to establish and maintain existing drainage patterns. Therefore, the proposed project would not alter the existing drainage pattern of the site or increase the rate or amount of surface runoff in a manner that would result in an impact related to substantial erosion or siltation on- or off-site.

Compliance with existing regulatory requirements would reduce or eliminate the proposed project's potential to substantially alter the existing drainage pattern of the site. Impacts would be less than significant, and no mitigation is required.

ii. Substantially increase the rate or amount of surface runoff in a manner, which would result in flooding on- or off-site?

During construction, soil would be disturbed and compacted, and drainage patterns would be temporarily altered, which can increase the volume and velocity of stormwater runoff and increase the potential for localized flooding compared to existing conditions. As discussed above, the Construction General Permit requires the preparation of a SWPPP and implementation of construction BMPs to control and direct surface runoff on-site. With adherence to the Construction General Permit, construction impacts related to altering the existing drainage pattern of the site or area or increase the rate or amount of surface runoff in a manner that would result in flooding on-site or offsite would be less than significant.

While the project would permanently increase the impervious surface area, the project would maintain the overall on-site drainage patterns and continue to direct surface water to catch basins that flow into existing storm drains south and west of the site. Prior to the issuance of building permits, the Project Applicant would be required to provide a stormwater improvement plan to the City to ensure that the stormwater system would be capable of handling a 25-year storm and that the drainage facilities conform to City requirements. Additionally, the Project Applicant would be required to pay for all necessary improvement costs if the City determines that the City's storm drain system or storm drain pumping capacity requires expansion or modification as a result of the project. Therefore, the project would not alter the existing drainage pattern of the site or area or increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site and impacts would be considered less than significant. No mitigation is required.

iii. Create or contribute runoff water, which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Construction. The proposed project would result in an increase in impervious surfaces given that the project site would be mostly built out aside from planting areas located in the parking lot and the perimeter of the project site. However, compliance with pre-existing regulatory requirements, including compliance with the Construction General Permit and implementation of a SWPPP, would reduce or eliminate the potential for project construction to cause substantial additional polluted runoff or runoff in excess of existing or planned stormwater drainage systems. Therefore, construction would not result in additional sources of polluted runoff to be discharged to the storm drain system and impacts would be less than significant.

Operations. As discussed above, the proposed project would result in an increase in impervious surfaces which would increase the volume of runoff from the project site during a storm. However, compliance with existing regulatory requirements, including the MS4, as specified in the Industrial General Permit, would reduce or eliminate the potential for project operations to cause substantial additional polluted runoff or runoff in excess of existing or planned stormwater drainage systems. Therefore, project operations would not result in additional sources of polluted runoff to be discharged to the storm drain system and impacts would be less than significant. No mitigation is required.

iv. Impede or redirect flood flows?

The proposed project is not located within the 100-year flood hazard area as mapped by the Federal Emergency Management Agency (FEMA).[22] Therefore, the proposed project would not impede or redirect potential flood flows, and the proposed project would have no impact. No mitigation is required.

d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

The project site is not located in flood hazard, tsunami, or seiche zones. Refer to discussion a) in Section IX, Hazards and Hazardous Materials regarding the use of hazardous materials within the project site. As a result, a less-than-significant impact would occur related to the release of pollutants due to project inundation in flood hazard, tsunami, or seiche zones. No mitigation is required.

[22] Federal Emergency Management Agency, 2020. FEMA Flood Map Service Center: Search By Address. Website: https://msc.fema.gov/portal/search?AddressQuery#searchresultsanchor (accessed November 2022).

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

The City is located within the Kings Subbasin, which is part of the larger San Joaquin Valley Groundwater Basin. The planning documents regarding water resources for the City include the City of Fresno UWMP and the City of Fresno Metropolitan Water Resources Management Plan. As noted above, the proposed project would be required to adhere to NPDES drainage control requirements during construction and operation as well as to FMFCD drainage control requirements. As a result, the proposed project would not include any other waste discharges that could conflict with the Basin Plan[23]. Therefore, the proposed project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan and impacts would be less than significant.

Mitigation Measures

The proposed project would not result in any potentially significant impacts related to hydrology and water quality, and no mitigation is required.

[23] North Kings Groundwater Sustainability Agency, 2020. Groundwater Sustainability Plan. Website: https://northkingsgsa.org/groundwater-sustainability-plan/ (accessed January 2023).

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XI. LAND USE AND PLANNING – Would the project:				
a) Physically divide an established community?				X
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?				X

DISCUSSION

a) Physically divide an established community?

The physical division of an established community typically refers to the construction of a physical feature (such as an interstate highway or railroad tracks) or removal of a means of access (such as a local road or bridge) that would impair mobility within an existing community, or between a community and outlying areas. For instance, the construction of an interstate highway through an existing community may constrain travel from one side of the community to another; similarly, such construction may also impair travel to areas outside of the community.

The proposed project would develop the currently vacant project site into a furniture retail store and associated parking, landscaping and infrastructure. The proposed project would not construct features that would divide an established community or remove means of access that would impair mobility in a community. Therefore, the proposed project would have no impact related to physically dividing an established community, and no mitigation is required.

b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

The project site is designated Commercial – Regional in the Fresno General Plan, which is intended to accommodate large-scale retail development to serve regional demand and zoned in the City's Commercial – Regional (CR) district, which is intended to meet local and regional retail demand, such as large-scale retail, office, civic and

entertainment uses, shopping malls with large-format or “big-box” retail, and supporting uses such as gas stations and hotels. The proposed project would introduce uses compatible with the zoning of the project site, as depicted in Fresno Municipal Code Table 15-1202 (Land Use Regulations, Commercial Districts).[24]

The project would not require a change the Fresno General Plan land use designation or the current zoning and would be consistent with the Fresno General Plan Land Use Objectives and Policies for commercial development, including Objective LU-6 and Policy LU-6-b, as well as the Zoning Ordinance. Additionally, the project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect and therefore would result in no impact. No mitigation is required.

Mitigation Measures

The proposed project would not result in any potentially significant impacts related to land use and planning, and no mitigation is required.

[24] City of Fresno. 2016. Fresno Municipal Code Chapter 15: Citywide Development Code. *Table 15-1302: Land Use Regulations—Employment Districts.* Website: https://www.fresno.gov/darm/wp-content/uploads/sites/10/2016/11/Complete_Code_March_2017.pdf (accessed December 2022).

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XII. MINERAL RESOURCES – Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?				X
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?				X

DISCUSSION

a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

The project site is located within an urban area and is currently vacant. There are no known mineral resources within or in the vicinity of the project site. The principal area for mineral resources in the City of Fresno Planning Area is located along the San Joaquin River Corridor. The California Department of Mines and Geology classifies lands along the San Joaquin River Corridor as Mineral Resource Zones (MRZ) 1, MRZ 2, and MRZ-3. The project site is not located in the vicinity of the San Joaquin River Corridor and does not contain mineral resources. Furthermore, no mineral extraction operations occur in the project vicinity. Therefore, the proposed project would not result in the loss of availability of known mineral resources, and would result in no impact. No mitigation is required.

b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

As shown in the discussion for a), the project site is not located within or in the vicinity of any known mineral extraction operations or near the San Joaquin River Corridor, an area of known mineral resources in the City. As such, the proposed project would not result in the loss of availability of any known locally important mineral resource recovery sites. Therefore, the proposed project would result in no impact. No mitigation is required.

Mitigation Measures

The proposed project would not result in any potentially significant impacts related to mineral resources, and no mitigation is required.

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIII. NOISE – Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?		X		
b) Generation of excessive groundborne vibration or groundborne noise levels?			X	
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?			X	

DISCUSSION

a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or in other applicable local, state, or federal standards?

Noise is usually defined as unwanted sound. Noise consists of any sound that may produce physiological or psychological damage and/or interfere with communication, work, rest, recreation, or sleep. Several noise measurement scales exist that are used to describe noise in a particular location. A decibel (dB) is a unit of measurement that indicates the relative intensity of a sound. Sound levels in dB are calculated on a logarithmic basis. An increase of 10 dB represents a 10-fold increase in acoustic energy, while 20 dB is 100 times more intense and 30 dB is 1,000 times more intense.

Each 10 dB increase in sound level is perceived as approximately a doubling of loudness; and similarly, each 10 dB decrease in sound level is perceived as half as loud. Sound intensity is normally measured through the A-weighted sound level (dBA). This scale gives greater weight to the frequencies of sound to which the human ear is most sensitive. The A-weighted sound level is the basis for 24-hour sound measurements that better represent human sensitivity to sound at night.

As noise spreads from a source, it loses energy so that the farther away the noise receiver is from the noise source, the lower the perceived noise level would be. Geometric spreading causes the sound level to attenuate or be reduced, resulting in a 6 dB reduction in the noise level for each doubling of distance from a single point source of noise to the noise sensitive receptor of concern.

There are many ways to rate noise for various time periods, but an appropriate rating of ambient noise affecting humans also accounts for the annoying effects of sound. Equivalent continuous sound level (L_{eq}) is the total sound energy of time-varying noise over a sample period. However, the predominant rating scales for human communities in the State of California are the L_{eq}, the community noise equivalent level (CNEL), and the day-night average level (L_{dn}) based on dBA. CNEL is the time varying noise over a 24-hour period, with a 5 dBA weighting factor applied to the hourly L_{eq} for noises occurring from 7:00 p.m. to 10:00 p.m. (defined as relaxation hours) and 10 dBA weighting factor applied to noise occurring from 10:00 p.m. to 7:00 a.m. (defined as sleeping hours). L_{dn} is similar to the CNEL scale, but without the adjustment for events occurring during the evening relaxation hours. CNEL and L_{dn} are within one dBA of each other and are normally exchangeable. The noise adjustments are added to the noise events occurring during the more sensitive hours.

A project would have a significant noise effect if it would substantially increase the ambient noise levels for adjoining areas or conflict with adopted environmental plans and goals of applicable regulatory agencies, including, as appropriate, the City of Fresno.

The City of Fresno addresses noise in the Noise Element of the Fresno General Plan and in Chapter 10, Article 1 (Noise Regulations), of the Fresno Municipal Code. Listed below are objectives and policies related to noise that are presented in the Noise Element of the Fresno General Plan. In addition, the Noise Element sets noise standards for transportation and stationary noise sources as shown in Table 4 and Table 5, below.

Table 4: Transportation (Non-Aircraft) Noise Sources

Noise-Sensitive Land Use[1]	Outdoor Activity Areas[2]	Interior Spaces	
	L_{dn}/CNEL, dB	L_{dn}/CNEL, dB	L_{eq} dB[2]
Residential	65	45	-
Transient Lodging	65	45	-
Hospitals, Nursing Homes	65	45	-
Theaters, Auditoriums, Music Halls	-	-	35
Churches, Meeting Halls	65	-	45
Office Buildings	-	-	45
Schools, Libraries, Museums	-	-	45

Source: City of Fresno General Plan (2014).

[1] Where the location of outdoor activity areas is unknown or is not applicable, the exterior noise level standard shall be applied to the property line of the receiving land use.

[2] As determined for a typical worst-case hour during periods of use.

CNEL = community noise equivalent level
dB = decibel(s)
L_{dn} = day-night average noise level
L_{eq} = equivalent continuous sound level

Table 5: Stationary Noise Sources

	Daytime (7:00 a.m. to 10:00 p.m.)	Nighttime (10:00 p.m. to 7:00 a.m.)
Hourly Equivalent Sound Level (L_{eq}), dBA	50	45
Maximum Sound Level (L_{max}), dBA	70	60

Source: City of Fresno General Plan (2014).

[1] The Planning and Development Director, on a case-by-case basis, may designate land uses other than those shown in this table to be noise-sensitive, and may require appropriate noise mitigation measures.

[2] As determined at outdoor activity areas. Where the location of outdoor activity areas is unknown or not applicable, the noise exposure standard shall be applied at the property line of the receiving land use. When ambient noise levels exceed or equal the levels in this table, mitigation shall only be required to limit noise to the ambient plus five dB.

dB = decibel(s)
dBA = A-weighted decibel(s)
L_{dn} = day-night average noise level
L_{eq} = equivalent continuous sound level
L_{max} = maximum A-weighted sound level

- **Policy NS-1-a: Desirable and Generally Acceptable Exterior Noise Environment.** Establish 65 dBA L_{dn} or CNEL as the standard for the desirable maximum average exterior noise levels for defined usable exterior areas of residential and noise-sensitive uses for noise, but designate 60 dBA L_{dn} or CNEL (measured at the property line) for noise generated by stationary sources impinging upon residential and noise-sensitive uses. Maintain 65 dBA L_{dn} or CNEL as the maximum average exterior noise levels for non-sensitive commercial land uses, and maintain 70 dBA L_{dn} or CNEL as maximum average exterior noise level for industrial land uses, both to be

measured at the property line of parcels where noise is generated which may impinge on neighboring properties.

- **Policy NS-1-c: Generally Unacceptable Exterior Noise Exposure Range.** Establish the exterior noise exposure of greater than 65 dB L_{dn} or CNEL to be generally unacceptable for residential and other noise sensitive uses for noise generated by sources in Policy NS-1-a, and study alternative less noise-sensitive uses for these areas if otherwise appropriate. Require appropriate noise reducing mitigation measures as determined by a site-specific acoustical analysis to comply with the generally desirable or generally acceptable exterior noise level and the required 45 dB interior noise level standards set in Table 4 as conditions of permit approval.

- **Policy NS-1-g:** Noise mitigation measures which help achieve the noise level targets of this plan include, but are not limited to, the following:

    - Façades with substantial weight and insulation;
    - Installation of sound-rated windows for primary sleeping and activity areas;
    - Installation of sound-rated doors for all exterior entries at primary sleeping and activity areas;
    - Greater building setbacks and exterior barriers;
    - Acoustic baffling of vents for chimneys, attic and gable ends;
    - Installation of mechanical ventilation systems that provide fresh air under closed window conditions.

- **NS-1-i Mitigation by New Development.** Require an acoustical analysis where new development of industrial, commercial, or other noise generating land uses (including transportation facilities such as roadways, railroads, and airports) may result in noise levels that exceed the noise level exposure criteria established by Tables 4 and 5 to determine impacts, and require developers to mitigate these impacts in conformance with Tables 4 and 5 as a condition of permit approval through appropriate means.

  Noise mitigation measures may include:

    - The screening of noise sources such as parking and loading facilities, outdoor activities, and mechanical equipment;
    - Providing increased setbacks for noise sources from adjacent dwellings;
    - Installation of walls and landscaping that serve as noise buffers;

- Installation of soundproofing materials and double-glazed windows; and
- Regulating operations, such as hours of operation, including deliveries and trash pickup.

Alternative acoustical designs that achieve the prescribed noise level reduction may be approved by the City, provided a qualified Acoustical Consultant submits information demonstrating that the alternative designs will achieve and maintain the specific targets for outdoor activity areas and interior spaces. As a last resort, developers may propose to construct noise walls along roadways when compatible with aesthetic concerns and neighborhood character. This would be a developer responsibility, with no City funding.

- **Policy NS-1-j: Significance Threshold.** Establish, as a threshold of significance for the City's environmental review process, that a significant increase in ambient noise levels is assumed if the project would increase noise levels in the immediate vicinity by 3 dB Ldn or CNEL or more above the ambient noise limits established in this General Plan Update.

Chapter 10, Article 1 (Noise Regulations), of the Fresno Municipal Code establishes excessive noise guidelines and exemptions. Section 10-109 states that construction noise is exempted from City noise regulations provided such work takes place between the hours of 7:00 a.m. and 10:00 p.m. on any day except Sunday.

Certain land uses are considered more sensitive to noise than others. Examples of these land uses include residential areas, educational facilities, hospitals, childcare facilities, and senior housing. The nearest sensitive receptors include single-family residences located approximately 65 feet west of the project site across North Abby Street.

The following section describes how the short-term construction and long-term operational noise impacts of the proposed project would be less than significant with mitigation.

Short-Term (Construction) Noise Impacts. Project construction would result in short-term noise impacts on the nearby sensitive receptors. Maximum construction noise would be short-term, generally intermittent depending on the construction phase, and variable depending on receiver distance from the active construction zone. The duration of noise impacts generally would be from one day to several days depending on the phase of construction. The level and types of noise impacts that would occur during construction are described below.

Short-term noise impacts would occur during grading and site preparation activities. Table 6 lists typical construction equipment noise levels (L_{max}) recommended for noise

impact assessments, based on a distance of 50 feet between the equipment and a noise receptor, obtained from the Federal Highway Administration (FHWA) Roadway Construction Noise Model. Construction-related short-term noise levels would be higher than existing ambient noise levels currently in the project area but would no longer occur once construction of the proposed project is completed.

Two types of short-term noise impacts could occur during construction of the proposed project. The first type involves construction crew commutes and the transport of construction equipment and materials to the site, which would incrementally increase noise levels on roads leading to the site. As shown in Table 6, there would be a relatively high single-event noise exposure potential at a maximum level of 84 dBA L_{max} with trucks passing at 50 feet.

The second type of short-term noise impact is related to noise generated during grading and construction on the project site. Construction is performed in discrete steps, or phases, each with its own mix of equipment and, consequently, its own noise characteristics. These various sequential phases would change the character of the noise generated on site. Therefore, the noise levels vary as construction progresses. Despite the variety in the type and size of construction equipment, similarities in the dominant noise sources and patterns of operation allow construction-related noise ranges to be categorized by work phase.

Table 6: Typical Construction Equipment Noise Levels

Equipment Description	Acoustical Usage Factor (%)	Maximum Noise Level (L_{max}) at 50 Feet[1]
Backhoes	40	80
Compactor (ground)	20	80
Compressor	40	80
Cranes	16	85
Dozers	40	85
Dump Trucks	40	84
Excavators	40	85
Flat Bed Trucks	40	84
Forklift	20	85
Front-end Loaders	40	80
Graders	40	85
Impact Pile Drivers	20	95
Jackhammers	20	85
Pick-up Truck	40	55
Pneumatic Tools	50	85
Pumps	50	77
Rock Drills	20	85
Rollers	20	85
Scrapers	40	85
Tractors	40	84

Table 6: Typical Construction Equipment Noise Levels

Equipment Description	Acoustical Usage Factor (%)	Maximum Noise Level (L_{max}) at 50 Feet[1]
Welder	40	73

Source: Roadway Construction Noise Model (FHWA 2006).
Note: Noise levels reported in this table are rounded to the nearest whole number.
[1] Maximum noise levels were developed based on Spec 721.560 from the Central Artery/Tunnel (CA/T) program to be consistent with the City of Boston's Noise Code for the "Big Dig" project.
L_{max} = maximum instantaneous sound level

Table 6 lists maximum noise levels recommended for noise impact assessments for typical construction equipment, based on a distance of 50 feet between the equipment and a noise receptor. Typical noise levels range up to 88 dBA L_{max} at 50 feet during the noisiest construction phases. The site preparation phase, which includes excavation and grading of the project site, tends to generate the highest noise levels because the noisiest construction equipment is earthmoving equipment. Earthmoving equipment includes excavating machinery such as backfillers, bulldozers, draglines, and front loaders. Earthmoving and compacting equipment includes compactors, scrapers, and graders. Typical operating cycles for these types of construction equipment may involve 1 or 2 minutes of full-power operation followed by 3 or 4 minutes at lower power settings.

Construction details (e.g., construction fleet activities) are not yet known; therefore, this analysis assumes that scrapers, bulldozers, and water trucks/pickup trucks would be operating simultaneously during construction of the proposed project. As discussed above, noise levels associated with this equipment operating simultaneously would be approximately 88 dBA L_{max} at 50 feet.

As noted above, the nearest sensitive receptors include single-family residences located approximately 65 feet west of the project site across North Abby Street. Based on a reduction in noise of 6 dBA per doubling of distance, there would be a decrease of approximately 2 dBA from the active construction area to the nearest residence. Therefore, the closest off-site sensitive receptor may be subject to short-term construction noise reaching 86 dBA L_{max} (88 dBA L_{max} – 2 dBA) when construction is occurring.

However, construction equipment would operate at various locations within the 8-acre project site and would only generate maximum noise levels when operations occur closest to the receptor. To ensure that the project's potential construction-related noise impacts are less than significant, Mitigation Measure NOI-1 requires the project to equip all construction equipment, fixed or mobile, with properly operating and maintained mufflers consistent with manufacturers' standards, which would reduce the potential impacts associated with construction equipment. Additionally, Mitigation Measure NOI-1 requires the project to designate a "disturbance coordinator" at the City who would be responsible for responding to any local complaints about construction noise. The

disturbance coordinator would determine the cause of the noise complaint (e.g., starting too early, bad muffler) and would determine and implement reasonable measures warranted to correct the problem. These measures would ensure that the project's potential construction-related noise impacts are mitigated to less-than-significant levels.

With implementation of Mitigation Measure NOI-1, the proposed project would result in a less-than-significant impact associated with the generation of a substantial temporary increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or in other applicable local, State, or federal standards.

Long-Term (Operational) Noise Impacts. Motor vehicles with their distinctive noise characteristics are the dominant noise source in the project vicinity. The amount of noise varies according to many factors, such as volume of traffic, vehicle mix (percentage of cars and trucks), average traffic speed, and distance from the observer. Implementation of the proposed project would result in new daily trips on local roadways in the project site vicinity. A characteristic of sound is that a doubling of a noise source is required in order to result in a perceptible (3 dBA or greater) increase in the resulting noise level.

As discussed below in Section XVII, Transportation, the proposed project would generate approximately 311 average daily trips. The project site is located adjacent to SR 41 and based on Figure NS-2 of the General Plan, the project site is subject to noise levels reaching 70 dB. As such, based on the project site's existing traffic noise levels and proximity to SR 41, the additional 311 average daily trips are not expected to result in a doubling of traffic volumes along any roadway segment in the project vicinity and would not result in a perceptible increase in traffic noise levels at receptors in the project vicinity.

In addition, with implementation of the proposed project, there would be an increase in activity at the project site. The project site itself is located in a primarily developed area surrounded primarily by other commercial uses. Noise from the proposed project would be similar to existing conditions and would generally include noise from vehicles, air conditioner units, and other similar equipment. It is not expected that the proposed project would result in a perceptible increase in noise to surrounding land uses. Therefore, it is not expected that the proposed project would substantially increase noise levels over existing conditions. Operation of the proposed project would result in similar noise levels as existing conditions and, therefore, it is not expected that the proposed project would substantially increase noise levels over existing conditions, and impacts would be less than significant with mitigation.

b) Generation of excessive groundborne vibration or groundborne noise levels?

Vibration refers to groundborne noise and perceptible motion. Groundborne vibration is almost exclusively a concern inside buildings and is rarely perceived as a problem outdoors. Vibration energy propagates from a source, through intervening soil and rock

layers, to the foundations of nearby buildings. The vibration then propagates from the foundation throughout the remainder of the structure. Building vibration may be perceived by the occupants as the motion of building surfaces, rattling of items on shelves or hanging on walls, or as a low-frequency rumbling noise. The rumbling noise is caused by the vibrating walls, floors, and ceilings radiating sound waves. Annoyance from vibration often occurs when the vibration exceeds the threshold of perception by 10 dB or less. This is an order of magnitude below the damage threshold for normal buildings.

Typical sources of groundborne vibration are construction activities (e.g., pavement breaking and operating heavy-duty earthmoving equipment), and occasional traffic on rough roads. In general, groundborne vibration from standard construction practices is only a potential issue when within 25 feet of sensitive uses. Groundborne vibration levels from construction activities very rarely reach levels that can damage structures; however, these levels are perceptible near the active construction site. With the exception of old buildings built prior to the 1950s or buildings of historic significance, potential structural damage from heavy construction activities rarely occurs. When roadways are smooth, vibration from traffic (even heavy trucks) is rarely perceptible.

The streets surrounding the project area are paved, smooth, and unlikely to cause significant groundborne vibration. In addition, the rubber tires and suspension systems of buses and other on-road vehicles make it unusual for on-road vehicles to cause groundborne noise or vibration problems. It is, therefore, assumed that no such vehicular vibration impacts would occur and, therefore, no vibration impact analysis of on-road vehicles is necessary. Therefore, once constructed, the proposed project would not contain uses that would generate groundborne vibration. This impact would be less than significant.

Construction Vibration. Construction of the proposed project could result in the generation of groundborne vibration. The project's construction vibration impact analysis evaluates the level of human annoyance using vibration levels in VdB and assesses the potential for building damages using vibration levels in peak particle velocity (PPV) (in/sec) because vibration levels calculated in root-mean-square (RMS) are best for characterizing human response to building vibration, while vibration level in PPV is best used to characterize potential for damage. The Federal Transit Administration (FTA) Transit Noise and Vibration Impact Assessment guidelines indicate that a vibration level up to 102 VdB (an equivalent to 0.5 in/sec in PPV) is considered safe for buildings consisting of reinforced concrete, steel, or timber (no plaster), and would not result in any construction vibration damage. For a non-engineered timber and masonry building, the construction vibration damage criterion is 94 VdB (0.2 in/sec in PPV).

Table 7 shows the PPV and VdB values at 25 feet from a construction vibration source. As shown in Table 7, bulldozers and other heavy-tracked construction equipment (except for pile drivers and vibratory rollers) generate approximately 87 VdB of groundborne vibration when measured at 25 feet, based on the Transit Noise and

Vibration Impact Assessment. At this level, groundborne vibration would result in potential annoyance to residents and workers but would not cause any damage to the buildings.

Table 7: Vibration Source Amplitudes for Construction Equipment

Equipment	Reference PPV/L_V at 25 feet	
	PPV (in/sec)	L_V (VdB)[1]
Pile Driver (Impact), Typical	0.644	104
Pile Driver (Sonic), Typical	0.170	93
Vibratory Roller	0.210	94
Hoe Ram	0.089	87
Large Bulldozer	0.089	87
Caisson Drilling	0.089	87
Loaded Trucks	0.076	86
Jackhammer	0.035	79
Small Bulldozer	0.003	58
Pile Driver (Impact), Typical	0.644	104

Source: Transit Noise and Vibration Impact Assessment (FTA 2018).
Note: Noise levels reported in this table are rounded to the nearest whole number.
[1] RMS vibration velocity in decibels (VdB) is 1 µin/sec.
µin/sec = micro-inches per second
FTA = Federal Transit Administration
in/sec = inches per second
L_V = velocity in decibels
PPV = peak particle velocity
RMS = root-mean-square
VdB = vibration velocity decibels

Construction vibration, similar to vibration from other sources, would not have any significant effects on outdoor activities (e.g., those outside of residences and commercial/office buildings in the project vicinity). Outdoor site preparation for the proposed project is expected to include the use of bulldozers and loaded trucks. The greatest levels of vibration are anticipated to occur during the site preparation phase. All other phases are expected to result in lower vibration levels. The distance to the nearest buildings for vibration impact analysis is measured between the nearest off-site buildings and the project boundary (assuming the construction equipment would be used at or near the project boundary) because vibration impacts occur normally within the buildings. The formula for vibration transmission is provided below.

$$L_vdB\ (D) = L_vdB\ (25\ ft) - 30\ Log\ (D/25)$$

$$PPV_{equip} = PPV_{ref} \times (25/D)^{1.5}$$

As shown in Table 7, for typical construction activity, the equipment with the highest vibration generation potential is the large bulldozer, which would generate 87 VdB at 25 feet. The closest buildings to the project site includes commercial buildings located 60 feet north of the project site boundary and 60 feet south of the project site boundary. At 60 feet, these buildings would experience vibration levels of up to 76 VdB (0.024 PPV [in/sec]), which would not exceed the FTA threshold of 94 VdB (0.2 in/sec PPV) for non-engineered timber and masonry building damage when bulldozers and loaded

trucks operate at or near the project construction boundary. Although construction vibration levels at surrounding uses would have the potential to result in annoyance, these vibration levels would no longer occur once construction of the project is completed and impacts would be considered less than significant. No mitigation is required.

c) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

The nearest airports include the Sierra Sky Airport, located approximately 4.8 miles west of the project site, the Fresno Yosemite International Airport, located approximately 6 miles southeast of the project site, and the Fresno Chandler Executive Airport, located approximately 7.9 miles southwest of the project site. In addition, the nearest medical center helipads include the Saint Agnes Medical Center, located 1.22 miles southeast of the project site. Although the project is located within two miles of a hospital heliport, heliport operations are not expected to expose people residing or working in the project area to excessive noise levels. The project site is not located within 2 miles of any local airports. The project is located in the Fresno County Airport Land Use Compatibility Plan within the boundaries of Fresno Yosemite International Airport, Zone 7 PAZ. Within Zone 7 PAZ, there is generally no concern with regard to any object up to 100 feet AGL unless it is located on high ground or it is a solitary object (e.g., an antenna) more than 35 feet AGL.[25] The proposed project is located in a generally flat area, and would include a retail facility with a maximum height of 42 feet. Additionally, the proposed facility is located adjacent to existing commercial facilities of similar dimensions and would not be a solitary object. In addition, although aircraft-related noise is occasionally audible on the project site, the site does not lie within the 55 dBA CNEL noise contours of any of these airports or helipads. Therefore, the proposed project would not expose people residing or working in the project area to excessive noise levels due to the proximity of a public airport. This impact would be less than significant. No mitigation is required.

Mitigation Measures

Mitigation Measure NOI-1: The project contractor shall implement the following measures during construction of the project:

- Construction of the masonry wall on the western property line shall be constructed during the first phase of the construction project.

- Equip all construction equipment, fixed or mobile, with properly operating and maintained mufflers consistent with manufacturers' standards.

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

- Place all stationary construction equipment so that emitted noise is directed away from sensitive receptors nearest the active project site.

- Locate equipment staging in areas that would create the greatest possible distance between construction-related noise sources and noise-sensitive receptors nearest the active project site during all construction activities.

- Ensure that all general construction-related activities are restricted to between the hours of 7:00 a.m. and 10:00 p.m. Monday through Saturday. No construction shall occur on Sunday.

- Designate a “disturbance coordinator” at the City who would be responsible for responding to any local complaints about construction noise. The disturbance coordinator would determine the cause of the noise complaint (e.g., starting too early, bad muffler) and would determine and implement reasonable measures warranted to correct the problem.

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIV. POPULATION AND HOUSING – Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?			X	
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				X

DISCUSSION

a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

The proposed project would include the construction of a furniture retail store and associated parking, landscaping and infrastructure. The proposed project would not result in direct population growth as the use proposed is not residential and would not contribute to permanent residency on site. Once operational, the proposed project would employ 85 people.

The 2022 Regional Transportation Plan & Sustainable Communities Strategy (RTP/SCS) prepared by the Fresno Council of Governments (Fresno COG) determined that a jurisdiction is considered housing rich if the employment-to-household ratio is less than 1.10 jobs for every household and job rich if the ratio is above 1.30 jobs for every household.[26] The City of Fresno had an employment-to-household ratio of 1.25 in 2020, which indicates that while the City is not considered "job poor", employment opportunities within the City's jurisdiction are likely to be occupied by residents of the City.[27] Further, the site is designated Commercial - Regional by the Fresno General

[26] Fresno Council of Governments, 2022. Draft Program Environmental Impact Report for the 2022 Regional Transportation Plan and Sustainable Communities Strategy. Pg. 3-403. April 15.

[27] Fresno Council of Governments, 2020. Fresno County 2019-2050 Growth Projections. Website: https://agendas.fresnocog.org/itemAttachments/604/Fresno_COG_2019_2050_Projections_Draft_Report_101920.pdf (accessed April 2023)

Plan and as such, development of the project would not generate growth beyond that anticipated in the Fresno General Plan. Therefore, the proposed project would not induce substantial unplanned population growth in an area, either directly or indirectly, and this impact would be considered less than significant. No mitigation is required.

b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No housing is currently present on the project site, and therefore, there are no people living on the project site that would be displaced by the proposed project. Therefore, there would be no impacts related to the displacement of substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere, and no mitigation is required.

Mitigation Measures

The proposed project would not result in any potentially significant impacts related to population and housing, and no mitigation is required.

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XV. PUBLIC SERVICES – Would the project:				
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
Fire protection?			X	
Police protection?			X	
Schools?			X	
Parks?			X	
Other public facilities?			X	

DISCUSSION

a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:

i. Fire protection?

The City of Fresno Fire Department (FFD) would provide fire protection services to the proposed project. There are 23 FFD fire stations in Fresno, with the closest fire station, Fire Station 13, located 1.08 miles northeast from the project site. Planned growth under the Fresno General Plan would increase calls for fire protection service in the City. The proposed project is consistent

with the land use designation identified in the Fresno General Plan, and does not represent unplanned growth given that the project site would be developed consistent with its land use and zoning designations. The project could result in an incremental increase in the demand for fire protection services as a result of additional employees to the project site. However, the proposed project would be required to comply with all applicable codes for fire safety and emergency access. Design of project access, internal circulation system, fire lanes and fire suppression features would be developed to City of Fresno standards and conditions of approval. In addition, the Project Applicant would be required to submit plans to the FFD for review and approval prior to the issuance of building permits to ensure the project would conform to applicable building codes and that adequate emergency access and on-site circulation are provided.

The FFD would continue providing services to the project site and would not require additional firefighters to serve the proposed project. The construction of a new or expanded fire station would not be required.[28] The proposed project would not result in a significant impact on the physical environment due to the incremental increase in demand for fire protection and life safety services. The incremental increase in demand for services is not expected to adversely affect existing responses times to the site or within the City. Therefore, construction and operation of the proposed project would have a less-than-significant impact on fire protection. No mitigation is required.

ii. Police protection?

The City of Fresno Police Department (FPD) provides police protection to the project site. The FPD headquarters are located at 2323 Mariposa Street, approximately 7.16 miles south of the project site. The project site is located within the Northeast Police District of the FPD, and the closest police station to the site is located at 1450 East Teague Avenue, approximately 1.9 miles northeast of the project site. Planned growth under the Fresno General Plan would increase calls for police protection service in the City. The proposed project is consistent with the land use designation identified in the Fresno General Plan, and does not represent unplanned growth. The project could result in an incremental increase in the demand for police protection services. The FPD would continue to provide services to the project site and would not require additional officers to serve the project site. The construction of new or expanded police facilities would not be required.[29] Therefore, the proposed project would not result in a substantial adverse impact associated with the provision of additional police facilities or services, and impacts to police protection would represent a less-than-significant impact. No mitigation is

[28] City of Fresno. Holt, Robert. Supervising Planner. April 11, 2023. Personal communication.

[29] City of Fresno. Holt, Robert. Supervising Planner. April 11, 2023. Personal communication.

required.

iii. Schools?

The project is located within the jurisdiction of the Clovis Unified School District (CUSD). The proposed project would not generate student demand or otherwise impact school services given that it does not include housing or a residential component. Additionally, the Project Applicant would be required to pay applicable school impact fees per Government Code Section 65995 et seq. to fund the development of additional school facilities and expansion of school services needed in the City. Through payment of applicable school impact fees, the proposed project would not result in significant impacts to CUSD. As such, there would be a less than significant impact related to schools.

iv. Parks?

Implementation of the proposed project would not increase the use of parks within the vicinity of the project site because the proposed project does not include a residential component. The proposed project is not expected to adversely affect the physical conditions of local and regional open space areas or recreational facilities, nor require the provisions of new parks or facilities. Therefore, the proposed project would result in a less than significant impact on the demand of parks in the area.

v. Other public facilities?

The proposed project would not increase population beyond what is planned in the Fresno General Plan; therefore, development of the proposed project would not increase demand for other public services, including libraries, community centers, and public health care facilities in a way that would require construction of additional facilities beyond what is planned to accommodate planned population growth in the Fresno General Plan. Therefore, impacts to other public facilities would be less than significant.

Mitigation Measures

The proposed project would not result in any potentially significant impacts related to public services, and no mitigation is required.

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVI. RECREATION - Would the project:				
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?			X	
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?				X

DISCUSSION

a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

The proposed project would include the construction of a furniture retail store and associated parking, landscaping and infrastructure, and would not include a residential component. As such, the proposed project is not expected to generate population growth that would result in an increase in the use of existing neighborhood and regional parks or other recreational facilities. Therefore, there would be a less-than-significant impact related to the increase in the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. No mitigation is required.

b) Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?

The proposed project would not include or require the construction or expansion of existing public recreational facilities; therefore, development of the proposed project and associated recreational opportunities for use by users of the project site would not result in additional environmental effects beyond those described in this document. As a result, no impact would occur to recreational facilities and the proposed project would

not require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment. No mitigation is required.

Mitigation Measures

The proposed project would not result in any potentially significant impacts related to recreational facilities, and no mitigation is required.

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

DISCUSSION

a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

The proposed project is located within Traffic Impact Zone (TIZ) III according to the Mobility and Transportation Element of the Fresno General Plan. According to the Mobility and Transportation Element, projects in TIZ III that generate more than 100 peak hour trips would require a detailed traffic analysis. Additionally, according to the City of Fresno Traffic Impact Study Report Guidelines, dated February 2009, a detailed LOS based Traffic Impact Study (TIS) shall not be required for a project if it generates less than 100 peak hour trips.

A vehicle miles traveled (VMT) analysis,[30] included as Appendix E, for the project was developed using rates from the Institute of Transportation Engineers (ITE) Trip Generation Manual (11th Edition) for Land Use 890 – "Furniture Store" The proposed project is anticipated to generate 27 trips in the a.m. peak hour, 54 trips in the p.m. peak hour, and 661 gross daily trips.

[30] LSA, 2023. *Fresno Living Spaces Vehicle Miles Traveled (VMT) Analysis Memorandum*. March 3.

Retail projects typically draw significant amount trips from the traffic passing the site on an adjacent street. These trips are not "new" trips made for the sole purpose of visiting the site, but are trips made as an intermediate stop enroute to a final destination. Trips from traffic passing the site on an adjacent street are referred to as "pass-by" trips. Pass-by trip percentage for the project land use was obtained from the ITE Trip Generation Manual (11th Edition). The pass-by trips were subtracted from the gross trip generation trips to obtain the net primary trips for the project. The project is anticipated to generate 27 net trips in the a.m. peak hour, 25 net trips in the p.m. peak hour, and 311 net daily trips, which falls below the City's 100 peak hour trip threshold. As such, the proposed project falls below the existing threshold for TIZ III as determined in the Fresno General Plan[31] and the 100-trip threshold established by the City's Guidelines.

Bus stop facilities for the 32 and 34 FAX bus lines run along East Alluvial Avenue, located approximately 85 and 175 feet north of the project site respectively. The proposed project would not involve the alteration of any existing transit and pedestrian facility or infrastructure in the surrounding area. Furthermore, because the traffic generated by the proposed project is below the threshold of significance identified in the Fresno General Plan and TIS Guidelines, the proposed project would not interfere with the operation of any transit, bicycle, and pedestrian facilities on the area. The proposed project is located in a Commercial - Regional (CR) zone, and the operations of the proposed project would be consistent with the permitted uses of the area. The proposed project would not conflict with applicable existing transportation programs and policies. Therefore, the proposed project would result in a less-than-significant impact.

b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

Senate Bill (SB) 743 requires that relevant CEQA analysis of transportation impacts be conducted using a metric known as vehicle miles traveled (VMT) instead of Level of Service (LOS). VMT measures how much actual auto travel (additional miles driven) a proposed project would create on California roads. If the project adds excessive car travel onto our roads, the project may cause a significant transportation impact.

The State CEQA Guidelines were amended to implement SB 743, by adding Section 15064.3. Among its provisions, Section 15064.3 confirms that, except with respect to transportation projects, a project's effect on automobile delay shall not constitute a significant environmental impact. Therefore, LOS measures of impacts on traffic facilities is no longer a relevant CEQA criteria for transportation impacts.

CEQA Guidelines Section 15064.3(b)(4) states that "[a] lead agency has discretion to evaluate a project's vehicle miles traveled, including whether to express the change in

[31] City of Fresno, 2014. Fresno General Plan-Mobility and Transportation Element. Available online at: https://www.fresno.gov/darm/wp-content/uploads/sites/10/2019/07/General-Plan-4-Mobility-and-Transportation-7-19.pdf (accessed December 2022).

absolute terms, per capita, per household or in any other measure. A lead agency may use models to estimate a project's vehicle miles traveled and may revise those estimates to reflect professional judgment based on substantial evidence. Any assumptions used to estimate used to estimate vehicle miles traveled and any revision to model outputs should be documented and explained in the environmental document prepared for the project. The standard of adequacy in Section 15151 shall apply to the analysis described in this section."

On June 25, 2020, the City of Fresno adopted CEQA Guidelines for Vehicle Miles Traveled Thresholds, pursuant to Senate Bill 743 to be effective of July 1, 2020. The thresholds described therein are referred to herein as the City of Fresno VMT Thresholds. The City of Fresno VMT Thresholds document was prepared and adopted consistent with the requirements of CEQA Guidelines Sections 15064.3 and 15064.7. The December 2018 Technical Advisory on Evaluating Transportation Impacts in CEQA (Technical Advisory) published by the Governor's Office of Planning and Research (OPR), was utilized as a reference and guidance document in the preparation of the Fresno VMT Thresholds.

The City of Fresno VMT Thresholds adopted a screening standard and criteria that can be used to screen out qualified projects that meet the adopted criteria from needing to prepare a detailed VMT analysis.[32] The City's guidelines include multiple screening criteria for land use projects. Also, an excel based VMT calculator tool is available from Fresno COG that can be used to conduct VMT analysis for small land use projects that are consistent with the Fresno General Plan. However, given the proposed retail land use of the project and the size of the proposed project size, the project would not meet screening criteria identified in the guidelines and the excel based VMT calculator tool would not be applicable for evaluation of retail projects. Therefore, a detailed VMT analysis was prepared for the project and Fresno COG's Activity-Based Model (ABM) was used to evaluate the project VMT impact.

For projects that are not screened out, a quantitative analysis of VMT impacts must be prepared and compared against the adopted VMT thresholds of significance. The Fresno VMT Thresholds document includes thresholds of significance for development projects, transportation projects, and land use plans. These thresholds of significance were developed using the County of Fresno as the applicable region, and the required reduction of VMT (as adopted in the Fresno VMT Thresholds) corresponds to Fresno County's contribution to the statewide GHG emission reduction target. In order to reach the statewide GHG reduction target of 15%, Fresno County must reduce its GHG emissions by 13%. The method of reducing GHG by 13% is to reduce VMT by 13% as well.

[32] City of Fresno, 2020. CEQA Guidelines for Vehicle Miles Traveled Thresholds for the City of Fresno. Available online at: https://www.fresno.gov/darm/wp-content/uploads/sites/10/2020/06/CEQA-Guidelines-for-Vehicle-Miles-Traveled-Thresholds-June-2020-DRAFT.pdf (accessed January 21, 2022)

The City's adopted thresholds for development projects correspond to the regional thresholds set by the Fresno COG. For residential and non-residential (except retail) development projects, the adopted threshold of significance is a 13% reduction, which means that projects that generate VMT in excess of a 13% reduction from the existing regional VMT per capita or per employee would have a significant environmental impact. Projects that reduce VMT by more than 13% are less than significant. For retail projects, the adopted threshold is any net increase in VMT per employee compared to existing VMT per employee.

Quantitative assessments of the VMT generated by a development project are determined using the Fresno COG Activity Based Model (ABM), which is a tour-based model.

Methodology. The VMT Guidelines suggest use of total VMT as the metric to evaluate retail land uses. The project consists of only retail land use and hence total VMT was used as the VMT metric. Therefore, if there is a net increase in total regional VMT for the "with project" scenario compared to the "no project" scenario, the project would result in a significant VMT impact. Total VMT for the "no project" scenario was obtained using a separate no project model run.

The first step in the preparation of this analysis was to update the traffic analysis zones (TAZs) in the model that includes the project area. Fresno COG ABM includes ability to add or split zones. In order to isolate the project VMT, a new zone was created in the model. The project description included the projected number of employees for the proposed project (85 employees) which was included in the newly created zone for modeling purposes. No project specific network modifications were required for the model run. A model run was conducted for the existing/base scenario with updated model inputs. The outputs from this updated model run were used to calculate the total regional VMT for the "with project" scenario.

Project Impact Determination. Based on the City's VMT Guidelines, the project will have a significant VMT impact if there is a net increase in total regional VMT for the "with project" compared to the "no project" scenario. As shown in Table 8 the total regional VMT for the "with project" scenario is less than the total regional VMT for the "no project" scenario. Therefore, as per the City's VMT Guidelines, the project would not have a significant VMT impact. As such, the proposed project would result in a less-than-significant VMT impact and is consistent with CEQA Guidelines Section 15064.3(b).

Table 8: Fresno County VMT for the No Project and With Project Scenario

	With Project	No Project	Difference
Total Roadway VMT	23,240,962	23,241,062	(100)

Source: LSA (March 3, 2023). *Fresno Living Spaces Vehicle Miles Traveled (VMT) Analysis Memorandum*

c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Vehicle access to the project site would be provided through one ingress and egress driveway along North Abby Street and one ingress and egress driveway located along the northwest boundary of the site; this driveway would connect to the adjacent commercial development north of the site and provide access for vehicles entering through, or exiting towards, two proposed driveways along East Alluvial Avenue. The proposed driveway along North Abby Street and the two driveways along East Alluvial Avenue are stop controlled. Therefore, vehicles exiting the project site from the project driveway must stop before they continue to merge on the neighboring circulation network.

Pedestrian circulation for the proposed project would occur through an existing pedestrian sidewalk along the project's frontage with North Abby Street and through internal pedestrian sidewalks and walkways in the project site.

The proposed project would not include any sharp curves or other roadway design elements that would create dangerous conditions. In addition, the project design features would be required to comply with standards set by the Fresno General Plan and City Engineer. In addition, the proposed project would also be required to submit plans to the FFD for review and approval prior to the issuance of building permits to ensure there are no substantial hazards associated with the project design. Therefore, the proposed project would result in a less-than-significant impact related to hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment), and no mitigation is required.

d) Result in inadequate emergency access?

Emergency vehicles would have access to the project site via three proposed ingress and egress driveways, one along North Abby Street, one along the northwest boundary of the site, and one along East Alluvial Avenue. The FFD's Fire Prevention Manual[33] includes FFD access requirements for properties within the City of Fresno. The project would comply with applicable access requirements, including provision of a minimum of two ingress and egress access points (for buildings over 650 feet in depth or width), provision of fire lane markings for emergency vehicle access (markings placed at 50 foot intervals), provision of a minimum clear drive width of 20 feet within the parking areas in the project site, and provision of appropriate turnarounds (minimum 44-foot centerline turning radius with a minimum of 20 feet clear drive width), among other requirements. Furthermore, the proposed project's site plan would be subject to review and approval by the FFD to ensure the project includes adequate emergency access. In

[33] Fresno Fire Department, 2008. Fire Prevention Manual. Development Requirements - 403.002 Fire Department Access. Website: https://www.fresno.gov/fire/wp-content/uploads/sites/6/2016/09/403.002.pdf (accessed April 2023).

addition, as discussed in Section IX, Hazards and Hazardous Materials, project implementation would not physically interfere with emergency evacuation or the FFD access to and from the project site. Therefore, the proposed project would result in less-than-significant impacts related to inadequate emergency access, and no mitigation is required.

Mitigation Measures

The proposed project would not result in any potentially significant impacts related to transportation, and no mitigation is required.

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVII. TRIBAL CULTURAL RESOURCES – Would the project:				
a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in PRC section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:		X		
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in PRC section 5020.1(k), or,		X		
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of PRC section 5024.1. In applying the criteria set forth in subdivision (c) of PRC section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.		X		

DISCUSSION

a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

i. **Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or**

ii. **A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.**

Tribal Cultural Resources are those resources with inherent tribal values that are difficult to identify through the same means as archaeological resources. These resources can be identified and understood through direct consultation with the tribes who attach tribal value to the resource. Tribal cultural resources may include Native American archaeological sites, but they may also include other types of resources such as cultural landscapes or sacred places. The appropriate treatment of tribal cultural resources is determined through consultation with tribes.

The State requires lead agencies to consider the potential effects of proposed projects and consult with California Native American tribes during the local planning process for the purpose of protecting Traditional Tribal Cultural Resources through the CEQA Guidelines. Pursuant to PRC Section 21080.3.1, the lead agency shall begin consultation with the California Native American tribe that is traditionally and culturally affiliated with the geographical area of the proposed project. Such significant cultural resources are either sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a tribe which is either on or eligible for inclusion in the California Historic Register or local historic register, or, the lead agency, at its discretion, and support by substantial evidence, choose to treat the resources as a Tribal Cultural Resources (PRC Section 21074(a)(1-2)).

Additional information may also be available from the California Native American Heritage Commission's Sacred Lands File per PRC Section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that PRC Section 21082.3(c) contains provisions specific to confidentiality.

Assembly Bill (AB) 52, which became law January 1, 2015, requires that, as part of the CEQA review process, public agencies provide early notice of a project to California Native American Tribes to allow for consultation between the tribe and the public agency. The purpose of AB 52 is to provide the opportunity for public agencies and tribes to consult and consider potential impacts to Tribal Cultural Resources (TCR's), as defined by the Public Resources Code (PRC) Section 2107(a). Under AB 52, public agencies shall reach out to California Native American Tribes who have requested to be notified of projects in areas within or which may have been affiliated with their tribal

geographic range. Pursuant to Assembly Bill 52 (AB 52), Table Mountain Rancheria and Dumna Wo Wah Tribes were invited to consult. A certified letter was mailed to the above-mentioned tribes on March 14, 2023. The 30-day comment period ended on April 13, 2023. The contracted Tribes did not provide a response to invitations to consult.

No tribal cultural resources or historical resources listed in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k) were identified on the project site through the record search process, field survey process or review of the Sacred Lands File through the Native American Heritage Commission (NAHC).[34] If any artifacts are inadvertently discovered during ground-disturbing activities, existing federal, State, and local laws and regulations would require construction activities to cease until such artifacts are properly examined and determined not to be of significance by a qualified cultural resources professional. In addition, Mitigation Measures CUL-1, CUL-2 and CUL-3 included above in Section V, Cultural Resources, would apply to the project and would reduce potential impacts to unknown historical resources to less than significant.

Mitigation Measures

Mitigation Measure CUL-1: If previously unknown resources are encountered before or during grading activities, construction shall stop in the immediate vicinity of the find and a qualified historical resources specialist shall be consulted to determine whether the resource requires further study. The qualified historical resources specialist shall make recommendations to the City on the measures that shall be implemented to protect the discovered resources, including but not limited to excavation of the finds and evaluation of the finds in accordance with Section 15064.5 of the CEQA Guidelines and the City's Historic Preservation Ordinance. If the resources are determined to be unique historical resources as defined under Section 15064.5 of the CEQA Guidelines, measures shall be identified by the monitor and recommended to the Lead Agency. Appropriate measures for significant resources could include avoidance or capping, incorporation of the site in green space, parks, or open space, or data recovery excavations of the finds.

No further grading shall occur in the area of the discovery until the Lead Agency approves the measures to protect these. Any historical artifacts recovered as a result of mitigation shall be provided to a City-approved institution or person who is capable of providing long-term preservation to allow future scientific study.

Mitigation Measure CUL-2: In the event that buried prehistoric archaeological resources are discovered during excavation and/or construction activities, construction shall stop in the immediate vicinity of the find and a qualified archaeologist shall be consulted to assess the nature and significance of the find and determine whether the resource requires further study. The qualified

[34] LSA, 2023. *Cultural Resources Survey Study for the Living Spaces Project in Fresno, Fresno County, California (LSA Project No. LSP2201)*. March 7.

archaeologist shall make recommendations to the City on the measures that shall be implemented to protect the discovered resources pursuant to California Code of Regulations [CCR], Title 14, Chapter 3, Section 15064.5(f))., including but not limited to collection and documentation of artifacts, documentation of the cultural resources on State of California Department of Parks and Recreation Series 523 forms, or subsurface testing.

If determined appropriate by the qualified archaeologist, archaeological monitoring shall commence and continue until grading and excavation are complete or until the monitoring archaeologist determines, based on field observations and in consultation with the qualified archaeologist, that there is little likelihood of encountering additional archaeological cultural resources. Archaeological monitoring may be reduced from full-time to part-time or spot-checking if determined appropriate by the qualified archaeologist based on monitoring results. Upon completion of any monitoring activities, the archaeologist shall prepare a report to document the methods and results of monitoring activities. The final version of this report shall be submitted to the SSJVIC.

If the found resources are determined to be unique prehistoric archaeological resources as defined under Section 15064.5 of the CEQA Guidelines, mitigation measures shall be identified by the monitor and recommended to the Lead Agency. Appropriate measures for significant resources could include avoidance or capping, incorporation of the site in green space, parks, or open space, or data recovery excavations of the finds. No further grading shall occur in the area of the discovery until the Lead Agency approves the measures to protect these resources. Any prehistoric archaeological artifacts recovered as a result of mitigation shall be provided to a City-approved institution or person who is capable of providing long-term preservation to allow future scientific study.

Mitigation Measure CUL-3: In the event that human remains are unearthed during excavation and grading activities of any future development project, all activity shall cease immediately. Pursuant to Health and Safety Code (HSC) Section 7050.5, no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98(a). If the remains are determined to be of Native American descent, the coroner shall within 24 hours notify the Native American Heritage Commission (NAHC). The NAHC shall then contact the most likely descendent of the deceased Native American, who shall then serve as the consultant on how to proceed with the remains. Pursuant to PRC Section 5097.98(b), upon the discovery of Native American remains, the landowner shall ensure that the immediate vicinity, according to generally accepted cultural or archaeological standards or practices, where the Native American human remains are located is not damaged or disturbed by further development activity until the landowner has discussed and conferred with the most likely descendants regarding their recommendations, if applicable, taking into account the possibility of multiple

human remains. The landowner shall discuss and confer with the descendants all reasonable options regarding the descendants' preferences for treatment.

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

DISCUSSION

a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

As identified in the Project Description, utilities required to serve the proposed project would include water, sanitary sewer, storm water drainage, electricity, natural gas, and telecommunications infrastructure.

Water. The proposed project would preserve existing on-site connections to the existing water main in North Abby Street and would install additional 2-inch water lines on-site to improve water distribution and circulation in the project site.

Short-term demand for water may occur during excavation, grading, and construction activities on site. Construction activities would require water primarily for dust mitigation purposes. Water from the existing potable water lines in the vicinity of the project site would be used. Overall, short-term construction activities would require minimal water and are not expected to have any adverse impacts on the existing water system or available water supplies. The proposed project would not require the construction of new or expanded water conveyance, treatment, or collection facilities with respect to construction activities.

According to the City's 2020 Urban Water Management Plan (UWMP), the City's water system consists of about 1,860 miles of distribution and transmission mains, 202 active municipal groundwater wells, three surface water treatment facilities (SWTFs) with current rated capacities ranging from 4 to 54 million gallons per day (mgd), five water storage facilities with pump stations, including one at each of the SWTFs plus two in the distribution system, and three booster pump facilities. The City's UWMP identified that the City's 2020 daily per capita water use target was 247 gallons per capita per day (GPCD). The project would include 85 employees during daily operations, which would require approximately 20,995 gallons per day. Based on the nature of the proposed project, the project-generated increase in water demand would be minimal and would fall within the City's existing capacity and available supply. Additionally, as described in the discussion for b) below, the City would have sufficient water supplies during normal, single-year dry and multiple-year dry scenarios through 2045, and given that the project would comply with would introduce uses compatible with the zoning and land use designation of the project site, the proposed project would be consistent with growth under the Fresno General Plan and would be accounted for in the City's UWMP projections.

As such, the proposed project would not necessitate new or expanded water entitlements, and the City would be able to accommodate the increased demand for potable water. As such, the proposed project would not necessitate new or expanded

water entitlements, and the City would be able to accommodate the increased demand for potable water.

Wastewater. Wastewater services would also be provided by the City. The proposed project would remove existing wastewater connections in the project site, with exception of a direct connection line with the wastewater main on North Abby Street. The proposed project would construct additional new 6-inch internal wastewater connections to increase connectivity of wastewater flow in the project site.

No significant increase in wastewater flows is anticipated as a result of construction activities on the project site. Sanitary services during construction would be provided by portable toilet facilities, which transport waste off site for treatment and disposal. In addition, wastewater generation associated with the proposed project is not anticipated to exceed wastewater treatment requirements or exceed the available capacity to accommodate the increased wastewater flows from the proposed project. The project would be adequately served by the capacity and the existing wastewater conveyance system. As such, the proposed project would not necessitate new or expanded water entitlements, and the City would be able to accommodate the increased demand for potable water.

Stormwater and Drainage Facilities. Impacts to storm drainage facilities have been previously discussed in Section X, Hydrology and Water Quality. The proposed project would result in the construction of new stormwater drainage facilities or the expansion of existing facilities. Specifically, the proposed project would include construction of new surface and subsurface drainage infrastructure, including bioretention areas to encourage stormwater infiltration and manholes, drainage basins, and drainage lines to direct stormwater towards the City's existing stormwater system along the site's southern boundary and west of the site in North Abby Street. However, the construction of such minor facilities would be constructed in conformance with City standards; therefore, its construction would not cause significant environmental effects.

Electricity, Natural Gas, and Telecommunication Facilities. The project site currently contains a PG&E easement and a PG&E concrete utility structure in the central portion of the site that would be removed. Electric power, natural gas, and telecommunication facilities would require connections to the project site. However, because the project site is located within an urbanized area with existing facilities in close proximity, connection to these facilities would not cause significant environmental effects. As a result, the project would result in a less-than-significant impact related to the relocation or construction or new or expanded utilities.

Summary. The proposed project would not require or result in the relocation or construction of new or expanded facilities for water, wastewater treatment, storm drainage, electric power, natural gas, or telecommunications which could cause significant environmental effects. Impacts would be less than significant, and no mitigation is required.

b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Refer to discussion b) of Section X, Hydrology and Water Quality. The City of Fresno Department of Public Utilities would supply water to the project site. Based on the City's 2020 Urban Water Management Plan (UWMP), the water supplies under normal conditions for the City from 2025 (329,030 Acre Feet (AF)/year) to 2045 (357,330 AF)/year) would be sufficient to cover the potable water demand (i.e., 136,504 AF by 2025 and 167,947 AF by 2045) for each normal year through 2045.[35] Additionally, water supplies for the city during single dry year and five dry year periods are predicted to be sufficient to accommodate potable water demand in the City through 2045.

The proposed project would introduce a furniture retail store and associated parking, landscaping, and infrastructure into the project site. The project site is designated Commercial – Regional in the Fresno General Plan and zoned within the City's Commercial – Regional (CR) district, which is intended to meet local and regional retail demand, such as large-scale retail, office, civic and entertainment uses, shopping malls with large-format or "big-box" retail and supporting uses such as gas stations and hotels. The proposed project would introduce uses compatible with the zoning and land use designation of the project site. As such, the proposed project would be consistent with growth under the Fresno General Plan and would be accounted for in the City's UWMP projections. Therefore, the proposed project would have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years, and impacts would be less than significant. No mitigation is required.

c) Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Refer to discussion a) above. Wastewater generation associated with the proposed project is not anticipated to exceed wastewater treatment requirements or exceed the available capacity to accommodate the increased wastewater flows from the proposed project. The project would be adequately served by the capacity and the existing wastewater conveyance system. In addition, the proposed project is not expected to exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board. As such, the proposed project would result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments and impacts would be less than significant. No mitigation is

[35] City of Fresno. 2021. 2020 Urban Water Management Plan. Website: https://www.fresno.gov/publicutilities/wp-content/uploads/sites/16/2021/07/Fresno-2020-UWMP_Final_2021-07-21.pdf (accessed December 2022).

required. In addition, the proposed project would be subject to the payment of any applicable connection charges and/or fees and extension of services in a manner that is compliant with the Department of Public Utilities standards, specifications, and policies. As such, impacts would be less than significant. No mitigation is required.

d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Garbage disposed of in the City of Fresno is taken to Cedar Avenue Recycling and Transfer Station. Once trash has been off-loaded at the transfer station, it is sorted, and non-recyclable solid waste is loaded onto large trucks and taken to the American Avenue Landfill located approximately 6 miles southwest of Kerman.

The American Avenue Landfill (i.e., American Avenue Disposal Site 10-AA-0009) has a maximum permitted capacity of 32,700,000 cubic yards and a remaining capacity of 29,358,535 cubic yards, with an estimated closure date of August 31, 2031. The maximum permitted throughput is 2,200 tons per day.

Other landfills within the County of Fresno include the Clovis Landfill (City of Clovis Landfill 10-AA-0004) with a remaining capacity of 7,740,000 cubic yards, a maximum permitted throughput of 2,000 tons per day, and an estimated closure date of April 30, 2047.[36] [37]

Based on CalEEMod, operation of the proposed project would generate approximately 1,153 tons of solid waste per year, which is approximately 3.2 tons per day. Given the available capacity at the landfills, the additional solid waste generated by the proposed project is not anticipated to cause the facility to exceed its daily permitted capacity. Additionally, the project would include a vertical cardboard baler and an Expanded Polystyrene (EPS) foam melting machine on-site to compact waste EPS foam and cardboard for recycling. The recycled material would then be transported to the Project Applicant's distribution center to be sold as raw material for the fabrication of recycled goods. In this way, the proposed project would reduce waste generated on-site that would be sent to landfills. Therefore, the proposed project would be served by a landfill with sufficient capacity to accommodate the proposed project's waste disposal needs, and impacts associated with the disposition of solid waste would be less than significant.

e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

[36] CalRecycle. SWIS Facility/Site Summary. American Avenue Disposal Site (10-AA-0009). Website: https://www2.calrecycle.ca.gov/SolidWaste/Site/Summary/352 (accessed December 13, 2022).

[37] CalRecycle. SWIS Facility/Site Summary. City Of Clovis Landfill (10-AA-0004). Website: https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/4529?siteID=347 (accessed December 13, 2022).

The proposed project would comply with CALGreen, the City's Construction and Demolition (C&D) Waste Management Guide, and with waste management policies and recommendations from the Fresno General Plan and the Greenhouse Gas Reduction Plan Update.[38] The proposed project would dispose of waste in accordance with applicable federal, state, and local recycling, reduction, and waste requirements and policies. Therefore, the proposed project would not conflict with federal, state, and local management and reduction statutes and regulations related to solid waste, and impacts would be less than significant. No mitigation is required.

Mitigation Measures

The proposed project would not result in any potentially significant impacts related to utilities and service systems, and no mitigation is required.

[38] City of Fresno. 2021. Greenhouse Gas Reduction Plan Update. Website: https://www.fresno.gov/darm/wp-content/uploads/sites/10/2021/03/Link4AppendixGGHGRPUpdate.pdf (accessed November 2022).

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

DISCUSSION

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?

The California Emergency Services Act requires cities to prepare and maintain an Emergency Plan for natural, manmade, or war-caused emergencies that result in

conditions of disaster or in extreme peril to life. The City's full-time Emergency Preparedness Officer (EPO) is responsible for ensuring that Fresno's emergency response plans are up-to-date and implemented properly. The EPO also facilitates cooperation between City departments and other local, State and federal agencies that would be involved in emergency response operations. The City of Fresno Emergency Operations Center (EOC) serves as the coordination and communication between the City of Fresno and Fresno County Operational Area EOC. The proposed project would not result in any alterations of existing roadways that would block the circulation of emergency response services or introduce elements that would conflict with the operations of the EOC. Therefore, the proposed project would not interfere with emergency evacuation plans in the City, and this impact would be less than significant.

b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

Wildland fires occur in geographic areas that contain the types and conditions of vegetation, topography, weather, and structure density susceptible to risks associated with uncontrolled fires that can be started by lightning, improperly managed campfires, cigarettes, sparks from automobiles, and other ignition sources. According to the California Department of Forestry and Fire Protection (CAL FIRE) Fire Hazard Severity Zone Viewer, the project site is not located within a Very or High Fire Hazard Severity Zone in either a Local Responsibility Area (LRA) or a State Responsibility Area (SRA).[39] Sparse vegetation does exist between the project site's eastern boundary and SR 41, which represents limited ignition sources in the project vicinity. Design of project access, internal circulation system, fire lanes and fire suppression features would be developed to City of Fresno standards and conditions of approval requirements. Additionally, the Fresno Fire Department (FFD) would also review the proposed development plans prior to project approval to ensure that adequate emergency access and on-site circulation are provided. Therefore, with implementation of the City's design requirements and FFD review of project plans, the proposed project would not expose people or structures to a significant loss, injury or death involving wildland fires and there would be a no impact.

c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

Utility and infrastructure improvements included as part of the project are described in Section XIX, Utilities and in the Project Description. The project site is not located in or near a very high fire hazard severity zone (VHFHSZ). Utility installations would not exacerbate fire risk due to the location of the project site in an urban area outside of a

[39] Cal Fire. *Fire Hazard Severity Zone Viewer.* Available online at: https://egis.fire.ca.gov/FHSZ/ (accessed December 2022).

designated fire hazard zone. Therefore, the proposed project would not require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that would exacerbate fire risk or result in temporary or ongoing impacts to the environment. There would be no impact and no mitigation would be required.

d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

Landslides and other forms of mass wasting, including mud flows, debris flows, and soil slips, occur as soil moves downslope under the influence of gravity. Landslides are frequently triggered by intense rainfall or seismic shaking but can also occur as a result of erosion and downslope runoff caused by rain following a fire. As previously discussed in Section VII, Geology and Soils, the City of Fresno Planning Area is located within an area that consists of mostly flat topography within the Central Valley. Accordingly, there is no risk of large landslides in the majority of the Planning Area. In addition, the project site is generally level and would not expose people or structures to potential substantial adverse effects associated with landslides. Further, as stated previously, the project site is not located in or near a VHFHSZ in LRA or SRA. Therefore, the proposed project would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. There would be no impact and no mitigation would be required.

Mitigation Measures

The proposed project would not result in any potentially significant impacts related to wildfire, and no mitigation is required.

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIX. MANDATORY FINDINGS OF SIGNIFICANCE				
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?			X	
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?		X		
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?		X		

DISCUSSION

a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the

number or restrict the range of an endangered, rare, or threatened species, or eliminate important examples of the major periods of California history or prehistory?

The project site does not provide suitable habitat for special-status animal species. Common wildlife species that are adapted to urban environments are expected to continue to use the project site and vicinity. The project site is not occupied by, or suited for, any special-status species. As a result, the proposed project would not have direct or indirect adverse effects on special-status plants or wildlife. The project site is not in an area where there are important examples of California history or prehistory. As a result, a less-than-significant impact would occur.

b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)

The proposed project's impacts would be individually limited and not cumulatively considerable due to the site-specific nature of the potential impacts. The potentially significant impacts that can be reduced to less-than-significant levels with implementation of recommended mitigation measures include the topics of Aesthetics, Air Quality, Biological Resources, Cultural Resources, Noise and Tribal Cultural Resources. These impacts would primarily be related to construction-period activities, would be temporary in nature, and would not substantially contribute to any potential cumulative impacts associated with these topics.

For the topics of Agriculture and Forestry Resources, Energy, Geology and Soils, Hazards and Hazardous Materials, Hydrology and Water Quality Land Use and Planning, Mineral Resources, Population and Housing, Public Services, Recreation, Transportation, Utilities and Service Systems, and Wildlife, the proposed project would have no impacts or less-than-significant impacts, and therefore, the proposed project would not substantially contribute to any potential cumulative impacts for these topics.

c) Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?

The proposed project's potential to result in environmental effects that could directly or indirectly impacts human beings has been evaluated in this Initial Study. The proposed project would not result in environmental effects that would directly or indirectly adversely impact human beings and the environment.

Mitigation Measure Monitoring Program for Development Permit Application No. P22-04122

This Mitigation Monitoring and Reporting Program (MMRP) was formulated based upon the findings of the Initial Study/Mitigated Negative Declaration (IS/MND) prepared for the proposed Living Spaces Fresno Project (project). The MMRP, which is found in Table A of this section, lists mitigation measures recommended in the IS/MND for the proposed project and identifies mitigation monitoring requirements.

This MMRP has been prepared to comply with the requirements of State law (Public Resources Code Section 21081.6). State law requires the adoption of an MMRP when mitigation measures are required to avoid significant impacts. This requirement facilitates implementation of all mitigation measures adopted through the California Environmental Quality Act (CEQA) process. The MMRP is intended to ensure compliance during implementation of the project.

The MMRP is organized in a matrix format. The first column identifies the mitigation measure. The second column, entitled “Timing for Mitigation Measure,” refers to the implementation and schedule of mitigation measures. The third column, entitled “Mitigation Responsibility,” refers to the party responsible for implementing the mitigation measure. The fourth column, entitled “Monitoring/Reporting Agency,” refers to the agency responsible for oversight or ensuring that the mitigation measure is implemented. The fifth column, entitled “Verification,” will be initialed and dated by the individual designated to verify adherence to the project specific mitigation, when the mitigation measure is completed.

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Table A: Mitigation Monitoring and Reporting Program

MITIGATION MEASURE	Timing for Mitigation Measure	Mitigation Responsibility	Monitoring/ Reporting Agency	Verification (Initials and Date)
I. AESTHETICS				
Mitigation Measure AES-1: Lighting systems for street and parking areas shall include shields to direct light to the roadway surfaces and parking areas. Vertical shields on the light fixtures shall also be used to direct light away from adjacent light sensitive land uses such as residences.	Prior to issuance of building permits	Project Applicant	Public Works Department (PW) and Planning and Development	
Mitigation Measure AES-2: Lighting systems for non-residential uses, not including public facilities, shall provide shields on the light fixtures and orient the lighting system away from adjacent properties. Low intensity light fixtures shall also be used if excessive spillover light onto adjacent properties will occur.	Prior to issuance of building permits	Project Applicant	Planning and Development	
Mitigation Measure AES-3: Lighting systems for freestanding signs shall not exceed 100 foot Lamberts (FT-L) when adjacent to streets which have an average light intensity of less than 2.0 horizontal footcandles and shall not exceed 500 FT-L when adjacent to streets which have an average light intensity of 2.0 horizontal footcandles or greater.	Prior to issuance of building permits	Project Applicant	Planning and Development	
Mitigation Measure AES-4: Materials used on building facades shall be non-reflective.	Prior to issuance of building permits	Project Applicant	Planning and Development	
II. AGRICULTURE AND FORESTRY RESOURCES				

Table A: Mitigation Monitoring and Reporting Program

MITIGATION MEASURE	Timing for Mitigation Measure	Mitigation Responsibility	Monitoring/ Reporting Agency	Verification (Initials and Date)
There are no significant impacts to Agriculture and Forestry Resources.				
III. AIR QUALITY				
Mitigation Measure AIR-1: Consistent with SJVAPCD Regulation VIII (Fugitive PM10 Prohibitions), the following controls are required to be included as specifications for the proposed project and implemented at the construction site: • All disturbed areas, including storage piles, which are not being actively utilized for construction purposes, shall be effectively stabilized of dust emissions using water, chemical stabilizer/suppressant, covered with a tarp or other suitable cover or vegetative ground cover. • All on-site unpaved roads and off-site unpaved access roads shall be effectively stabilized of dust emissions using water or chemical stabilizer/suppressant. • All land clearing, grubbing, scraping, excavation, land leveling, grading, cut and fill, and demolition activities shall be effectively controlled of fugitive dust emissions utilizing application of water or by presoaking. • When materials are transported off site, all material shall be covered, or effectively wetted to limit visible dust emissions, and at least 6 inches of freeboard space from the	Prior to issuance of grading permits, during project construction	Construction Contractor	Planning and Development	

Table A: Mitigation Monitoring and Reporting Program

MITIGATION MEASURE	Timing for Mitigation Measure	Mitigation Responsibility	Monitoring/ Reporting Agency	Verification (Initials and Date)
top of the container shall be maintained. • All operations shall limit or expeditiously remove the accumulation of mud or dirt from adjacent public streets at the end of each workday. (The use of dry rotary brushes is expressly prohibited except where preceded or accompanied by sufficient wetting to limit the visible dust emissions. Use of blower devices is expressly forbidden). • Following the addition of materials to, or the removal of materials from, the surface of out-door storage piles, said piles shall be effectively stabilized of fugitive dust emission utilizing sufficient water or chemical stabilizer/suppressant.				
IV. BIOLOGICAL RESOURCES				
Mitigation Measure BIO-1: A preconstruction clearance survey shall be required for burrowing owl no more than 30 calendar days prior to initiation of project activities. All survey results shall be delivered to the City of Fresno. If an active burrowing owl burrow is found within the project site, the Project Applicant must coordinate with CDFW to obtain applicable agency approval/direction prior to any ground disturbance activities on the site. Specific avoidance, den excavation, passive relocation, and compensatory mitigation activities shall be performed as required by CDFW. If no active	Prior to issuance of grading permits	Construction contractor, qualified biologist	Planning and Development	

Table A: Mitigation Monitoring and Reporting Program

MITIGATION MEASURE	Timing for Mitigation Measure	Mitigation Responsibility	Monitoring/ Reporting Agency	Verification (Initials and Date)
burrowing owl burrows are identified, project activities may proceed as planned following the preconstruction survey.				
Mitigation Measure BIO-2: If vegetation removal, construction, or grading activities are planned to occur within the active nesting bird season (February 15 through September 15), a qualified biologist shall conduct a preconstruction nesting bird survey no more than 5 days prior to the start of such activities. The nesting bird survey shall include the project site and areas immediately adjacent to the site that could potentially be affected by project-related activities such as noise, vibration, increased human activity, and dust, etc. For any active nest(s) identified, the qualified biologist shall establish an appropriate buffer zone around the active nest(s). The appropriate buffer shall be determined by the qualified biologist based on species, location, and the nature of the proposed activities. Project activities shall be avoided within the buffer zone until the nest is deemed no longer active by the qualified biologist. Documentation of all survey results shall be provided to the City.	Prior to issuance of grading permits	Construction contractor, qualified biologist	Planning and Development	
V. CULTURAL RESOURCES				
Mitigation Measure CUL-1: If previously unknown resources are encountered before or during grading activities, construction shall stop	Prior to and during construction	Construction contractor, qualified	Planning and Development	

Table A: Mitigation Monitoring and Reporting Program

MITIGATION MEASURE	Timing for Mitigation Measure	Mitigation Responsibility	Monitoring/ Reporting Agency	Verification (Initials and Date)
in the immediate vicinity of the find and a qualified historical resources specialist shall be consulted to determine whether the resource requires further study. The qualified historical resources specialist shall make recommendations to the City on the measures that shall be implemented to protect the discovered resources, including but not limited to excavation of the finds and evaluation of the finds in accordance with Section 15064.5 of the CEQA Guidelines and the City's Historic Preservation Ordinance. If the resources are determined to be unique historical resources as defined under Section 15064.5 of the CEQA Guidelines, measures shall be identified by the monitor and recommended to the Lead Agency. Appropriate measures for significant resources could include avoidance or capping, incorporation of the site in green space, parks, or open space, or data recovery excavations of the finds. No further grading shall occur in the area of the discovery until the Lead Agency approves the measures to protect these. Any historical artifacts recovered as a result of mitigation shall be provided to a City-approved institution or person who is capable of providing long-germ preservation to allow future scientific study.	activities	historical resources specialist		

Table A: Mitigation Monitoring and Reporting Program

MITIGATION MEASURE	Timing for Mitigation Measure	Mitigation Responsibility	Monitoring/ Reporting Agency	Verification (Initials and Date)
Mitigation Measure CUL-2: In the event that buried prehistoric archaeological resources are discovered during excavation and/or construction activities, construction shall stop in the immediate vicinity of the find and a qualified archaeologist shall be consulted to assess the nature and significance of the find and determine whether the resource requires further study. The qualified archaeologist shall make recommendations to the City on the measures that shall be implemented to protect the discovered resources pursuant to California Code of Regulations [CCR], Title 14, Chapter 3, Section 15064.5(f))., including but not limited to collection and documentation of artifacts, documentation of the cultural resources on State of California Department of Parks and Recreation Series 523 forms, or subsurface testing. If determined appropriate by the qualified archaeologist, archaeological monitoring shall commence and continue until grading and excavation are complete or until the monitoring archaeologist determines, based on field observations and in consultation with the qualified archaeologist, that there is little likelihood of encountering additional archaeological cultural resources.	During construction activities	Construction contractor, qualified archaeologist	Planning and Development	

Table A: Mitigation Monitoring and Reporting Program

MITIGATION MEASURE	Timing for Mitigation Measure	Mitigation Responsibility	Monitoring/ Reporting Agency	Verification (Initials and Date)
Archaeological monitoring may be reduced from full-time to part-time or spot-checking if determined appropriate by the qualified archaeologist based on monitoring results. Upon completion of any monitoring activities, the archaeologist shall prepare a report to document the methods and results of monitoring activities. The final version of this report shall be submitted to the SSJVIC. If the found resources are determined to be unique prehistoric archaeological resources as defined under Section 15064.5 of the CEQA Guidelines, mitigation measures shall be identified by the monitor and recommended to the Lead Agency. Appropriate measures for significant resources could include avoidance or capping, incorporation of the site in green space, parks, or open space, or data recovery excavations of the finds. No further grading shall occur in the area of the discovery until the Lead Agency approves the measures to protect these resources. Any prehistoric archaeological artifacts recovered as a result of mitigation shall be provided to a City-approved institution or person who is capable of providing long-term preservation to allow future scientific study.				
Mitigation Measure CUL-3: In the event that human remains are unearthed during excavation and grading activities of any future	During construction activities	Construction contractor	Planning and Development	

Table A: Mitigation Monitoring and Reporting Program

MITIGATION MEASURE	Timing for Mitigation Measure	Mitigation Responsibility	Monitoring/ Reporting Agency	Verification (Initials and Date)
development project, all activity shall cease immediately. Pursuant to Health and Safety Code (HSC) Section 7050.5, no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98(a). If the remains are determined to be of Native American descent, the coroner shall within 24 hours notify the Native American Heritage Commission (NAHC). The NAHC shall then contact the most likely descendent of the deceased Native American, who shall then serve as the consultant on how to proceed with the remains. Pursuant to PRC Section 5097.98(b), upon the discovery of Native American remains, the landowner shall ensure that the immediate vicinity, according to generally accepted cultural or archaeological standards or practices, where the Native American human remains are located is not damaged or disturbed by further development activity until the landowner has discussed and conferred with the most likely descendants regarding their recommendations, if applicable, taking into account the possibility of multiple human remains. The landowner shall discuss and confer with the descendants all reasonable options regarding the descendants' preferences for treatment.				

Table A: Mitigation Monitoring and Reporting Program

MITIGATION MEASURE	Timing for Mitigation Measure	Mitigation Responsibility	Monitoring/ Reporting Agency	Verification (Initials and Date)
VI. ENERGY				
There are no significant impacts to Energy.				
VII. GEOLOGY AND SOILS				
There are no significant impacts to Geology and Soils.				
VIII. GREENHOUSE GAS EMISSIONS				
There are no significant impacts to Greenhouse Gas Emissions.				
IX. HAZARDS AND HAZARDOUS MATERIALS				
There are no significant impacts to Hazards and Hazardous Materials.				
X. HYDROLOGY AND WATER QUALITY				
There are no significant impacts to Hydrology and Water Quality.				
XI. LAND USE AND PLANNING				
There are no significant impacts to Land Use and Planning.				
XII. MINERAL RESOURCES				
There are no significant impacts to Mineral Resources.				
XIII. NOISE				
Mitigation Measure NOI-1: The project contractor shall implement the following measures during construction of the project: • Construction of the masonry wall on the western property line shall be constructed during the first phase of the construction project. • Equip all construction equipment, fixed or mobile, with properly operating and maintained mufflers consistent with manufacturers' standards.	Prior to issuance of grading permits, during project construction	Construction contractor	Planning and Development	

Table A: Mitigation Monitoring and Reporting Program

MITIGATION MEASURE	Timing for Mitigation Measure	Mitigation Responsibility	Monitoring/ Reporting Agency	Verification (Initials and Date)
• Place all stationary construction equipment so that emitted noise is directed away from sensitive receptors nearest the active project site. • Locate equipment staging in areas that would create the greatest possible distance between construction-related noise sources and noise-sensitive receptors nearest the active project site during all construction activities. • Ensure that all general construction-related activities are restricted to between the hours of 7:00 a.m. and 10:00 p.m. Monday through Saturday. No construction shall occur on Sunday. • Designate a "disturbance coordinator" at the City who would be responsible for responding to any local complaints about construction noise. The disturbance coordinator would determine the cause of the noise complaint (e.g., starting too early, bad muffler) and would determine and implement reasonable measures warranted to correct the problem.				
XIV. POPULATION AND HOUSING				
There are no significant impacts to Population and Housing.				
XV. PUBLIC SERVICES				
There are no significant impacts to Public Services.				

Table A: Mitigation Monitoring and Reporting Program

MITIGATION MEASURE	Timing for Mitigation Measure	Mitigation Responsibility	Monitoring/ Reporting Agency	Verification (Initials and Date)
XVI. RECREATION				
There are no significant impacts to Recreation.				
XVII. TRANSPORTATION				
There are no significant impacts to Transportation.				
XVII. TRIBAL CULTURAL RESOURCES				
There are no significant impacts to Tribal Cultural Resources.				
XIX. UTILITIES AND SERVICE SYSTEMS				
There are no significant impacts to Utilities and Service Systems.				
XX. WILDFIRE				
There are no significant impacts to Wildfire.				
XXI. MANDATORY FINDINGS OF SIGNIFICANCE				
There are no significant impacts related to Mandatory Findings of Significance.				

Source: LSA (April 2023).

Development Permit Application No. P22-04122

Appendix A

CalEEMod Output Sheets

Living Spaces Fresno Project Custom Report

Table of Contents

8. User Changes to Default Data

1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	Living Spaces Fresno Project
Lead Agency	—
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	2.70
Precipitation (days)	12.2
Location	7354 N Abby St, Fresno, CA 93720, USA
County	Fresno
City	Fresno
Air District	San Joaquin Valley APCD
Air Basin	San Joaquin Valley
TAZ	2429
EDFZ	5
Electric Utility	Pacific Gas & Electric Company
Gas Utility	Pacific Gas & Electric

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
Home Improvement Superstore	104	1000sqft	5.30	104,867	36,648	—	—	—
Parking Lot	298	Space	2.70	0.00	0.00	—	—	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

Sector	#	Measure Title
Construction	C-11	Limit Vehicle Speeds on Unpaved Roads

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.	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	7.50	39.9	29.1	0.07	1.12	7.76	8.88	1.02	3.96	4.98	6,679	0.22	0.59	6,870
Mit.	7.50	39.9	29.1	0.07	1.12	7.76	8.88	1.02	3.96	4.98	6,679	0.22	0.59	6,870
% Reduced	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	8.76	20.5	16.8	0.03	0.76	0.28	1.03	0.71	0.07	0.77	2,983	0.12	0.06	3,005
Mit.	8.76	20.5	16.8	0.03	0.76	0.28	1.03	0.71	0.07	0.77	2,983	0.12	0.06	3,005
% Reduced	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.58	9.16	7.15	0.01	0.31	0.55	0.86	0.28	0.25	0.53	1,425	0.06	0.05	1,441
Mit.	1.58	9.16	7.15	0.01	0.31	0.55	0.86	0.28	0.25	0.53	1,425	0.06	0.05	1,441
% Reduced	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.29	1.67	1.30	< 0.005	0.06	0.10	0.16	0.05	0.05	0.10	236	0.01	0.01	239

Mit.	0.29	1.67	1.30	< 0.005	0.06	0.10	0.16	0.05	0.05	0.10	236	0.01	0.01	239
% Reduced	—	—	—	—	—	—	—	—	—	—	—	—	—	—

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	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2023	1.16	39.9	29.1	0.07	1.12	7.76	8.88	1.02	3.96	4.98	6,679	0.22	0.59	6,870
2024	7.50	1.10	1.24	< 0.005	0.07	0.04	0.10	0.06	0.01	0.07	175	0.01	< 0.005	176
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2023	0.77	19.4	15.7	0.02	0.69	0.24	0.93	0.64	0.06	0.70	2,820	0.12	0.06	2,842
2024	8.76	20.5	16.8	0.03	0.76	0.28	1.03	0.71	0.07	0.77	2,983	0.12	0.06	3,005
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2023	0.34	9.16	7.15	0.01	0.31	0.55	0.86	0.28	0.25	0.53	1,425	0.06	0.05	1,441
2024	1.58	3.42	2.82	< 0.005	0.13	0.04	0.17	0.12	0.01	0.13	490	0.02	0.01	494
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2023	0.06	1.67	1.30	< 0.005	0.06	0.10	0.16	0.05	0.05	0.10	236	0.01	0.01	239
2024	0.29	0.62	0.51	< 0.005	0.02	0.01	0.03	0.02	< 0.005	0.02	81.2	< 0.005	< 0.005	81.8

2.3. Construction Emissions by Year, Mitigated

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

Year	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	CO2e

Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2023	1.16	39.9	29.1	0.07	1.12	7.76	8.88	1.02	3.96	4.98	6,679	0.22	0.59	6,870
2024	7.50	1.10	1.24	< 0.005	0.07	0.04	0.10	0.06	0.01	0.07	175	0.01	< 0.005	176
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2023	0.77	19.4	15.7	0.02	0.69	0.24	0.93	0.64	0.06	0.70	2,820	0.12	0.06	2,842
2024	8.76	20.5	16.8	0.03	0.76	0.28	1.03	0.71	0.07	0.77	2,983	0.12	0.06	3,005
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2023	0.34	9.16	7.15	0.01	0.31	0.55	0.86	0.28	0.25	0.53	1,425	0.06	0.05	1,441
2024	1.58	3.42	2.82	< 0.005	0.13	0.04	0.17	0.12	0.01	0.13	490	0.02	0.01	494
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2023	0.06	1.67	1.30	< 0.005	0.06	0.10	0.16	0.05	0.05	0.10	236	0.01	0.01	239
2024	0.29	0.62	0.51	< 0.005	0.02	0.01	0.03	0.02	< 0.005	0.02	81.2	< 0.005	< 0.005	81.8

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.	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	4.44	1.29	12.9	0.02	0.04	0.51	0.55	0.04	0.09	0.13	3,385	63.9	0.14	5,030
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	3.53	1.40	7.53	0.02	0.03	0.51	0.54	0.03	0.09	0.12	3,225	63.9	0.15	4,866
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Unmit.	3.92	1.35	9.66	0.02	0.04	0.51	0.54	0.04	0.09	0.13	3,274	63.9	0.14	4,916
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.71	0.25	1.76	< 0.005	0.01	0.09	0.10	0.01	0.02	0.02	542	10.6	0.02	814

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	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	1.28	0.98	8.14	0.02	0.01	0.51	0.52	0.01	0.09	0.10	1,707	0.08	0.09	1,742
Area	3.14	0.04	4.56	< 0.005	0.01	—	0.01	0.01	—	0.01	18.8	< 0.005	< 0.005	18.8
Energy	0.02	0.28	0.23	< 0.005	0.02	—	0.02	0.02	—	0.02	1,006	0.14	0.01	1,013
Water	—	—	—	—	—	—	—	—	—	—	32.4	1.52	0.04	81.1
Waste	—	—	—	—	—	—	—	—	—	—	622	62.1	0.00	2,175
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	0.50
Total	4.44	1.29	12.9	0.02	0.04	0.51	0.55	0.04	0.09	0.13	3,385	63.9	0.14	5,030
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	1.12	1.12	7.30	0.02	0.01	0.51	0.52	0.01	0.09	0.10	1,565	0.10	0.10	1,596
Area	2.40	—	—	—	—	—	—	—	—	—	—	—	—	—
Energy	0.02	0.28	0.23	< 0.005	0.02	—	0.02	0.02	—	0.02	1,006	0.14	0.01	1,013
Water	—	—	—	—	—	—	—	—	—	—	32.4	1.52	0.04	81.1
Waste	—	—	—	—	—	—	—	—	—	—	622	62.1	0.00	2,175
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	0.50
Total	3.53	1.40	7.53	0.02	0.03	0.51	0.54	0.03	0.09	0.12	3,225	63.9	0.15	4,866

Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	1.14	1.05	7.18	0.02	0.01	0.51	0.52	0.01	0.09	0.10	1,605	0.09	0.09	1,638
Area	2.76	0.02	2.25	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	9.25	< 0.005	< 0.005	9.28
Energy	0.02	0.28	0.23	< 0.005	0.02	—	0.02	0.02	—	0.02	1,006	0.14	0.01	1,013
Water	—	—	—	—	—	—	—	—	—	—	32.4	1.52	0.04	81.1
Waste	—	—	—	—	—	—	—	—	—	—	622	62.1	0.00	2,175
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	0.50
Total	3.92	1.35	9.66	0.02	0.04	0.51	0.54	0.04	0.09	0.13	3,274	63.9	0.14	4,916
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.21	0.19	1.31	< 0.005	< 0.005	0.09	0.09	< 0.005	0.02	0.02	266	0.02	0.02	271
Area	0.50	< 0.005	0.41	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	1.53	< 0.005	< 0.005	1.54
Energy	< 0.005	0.05	0.04	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	166	0.02	< 0.005	168
Water	—	—	—	—	—	—	—	—	—	—	5.36	0.25	0.01	13.4
Waste	—	—	—	—	—	—	—	—	—	—	103	10.3	0.00	360
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	0.08
Total	0.71	0.25	1.76	< 0.005	0.01	0.09	0.10	0.01	0.02	0.02	542	10.6	0.02	814

2.6. Operations Emissions by Sector, Mitigated

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

Sector	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	1.28	0.98	8.14	0.02	0.01	0.51	0.52	0.01	0.09	0.10	1,707	0.08	0.09	1,742
Area	3.14	0.04	4.56	< 0.005	0.01	—	0.01	0.01	—	0.01	18.8	< 0.005	< 0.005	18.8
Energy	0.02	0.28	0.23	< 0.005	0.02	—	0.02	0.02	—	0.02	1,006	0.14	0.01	1,013
Water	—	—	—	—	—	—	—	—	—	—	32.4	1.52	0.04	81.1

Waste	—	—	—	—	—	—	—	—	—	—	622	62.1	0.00	2,175
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	0.50
Total	4.44	1.29	12.9	0.02	0.04	0.51	0.55	0.04	0.09	0.13	3,385	63.9	0.14	5,030
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	1.12	1.12	7.30	0.02	0.01	0.51	0.52	0.01	0.09	0.10	1,565	0.10	0.10	1,596
Area	2.40	—	—	—	—	—	—	—	—	—	—	—	—	—
Energy	0.02	0.28	0.23	< 0.005	0.02	—	0.02	0.02	—	0.02	1,006	0.14	0.01	1,013
Water	—	—	—	—	—	—	—	—	—	—	32.4	1.52	0.04	81.1
Waste	—	—	—	—	—	—	—	—	—	—	622	62.1	0.00	2,175
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	0.50
Total	3.53	1.40	7.53	0.02	0.03	0.51	0.54	0.03	0.09	0.12	3,225	63.9	0.15	4,866
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	1.14	1.05	7.18	0.02	0.01	0.51	0.52	0.01	0.09	0.10	1,605	0.09	0.09	1,638
Area	2.76	0.02	2.25	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	9.25	< 0.005	< 0.005	9.28
Energy	0.02	0.28	0.23	< 0.005	0.02	—	0.02	0.02	—	0.02	1,006	0.14	0.01	1,013
Water	—	—	—	—	—	—	—	—	—	—	32.4	1.52	0.04	81.1
Waste	—	—	—	—	—	—	—	—	—	—	622	62.1	0.00	2,175
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	0.50
Total	3.92	1.35	9.66	0.02	0.04	0.51	0.54	0.04	0.09	0.13	3,274	63.9	0.14	4,916
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.21	0.19	1.31	< 0.005	< 0.005	0.09	0.09	< 0.005	0.02	0.02	266	0.02	0.02	271
Area	0.50	< 0.005	0.41	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	1.53	< 0.005	< 0.005	1.54
Energy	< 0.005	0.05	0.04	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	166	0.02	< 0.005	168
Water	—	—	—	—	—	—	—	—	—	—	5.36	0.25	0.01	13.4
Waste	—	—	—	—	—	—	—	—	—	—	103	10.3	0.00	360
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	0.08

Total	0.71	0.25	1.76	< 0.005	0.01	0.09	0.10	0.01	0.02	0.02	542	10.6	0.02	814

3. Construction Emissions Details

3.1. Site Preparation (2023) - Unmitigated

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

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.07	39.9	28.3	0.05	1.12	—	1.12	1.02	—	1.02	5,295	0.21	0.04	5,314
Dust From Material Movement	—	—	—	—	—	7.67	7.67	—	3.94	3.94	—	—	—	—
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
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.04	1.64	1.16	< 0.005	0.05	—	0.05	0.04	—	0.04	218	0.01	< 0.005	218
Dust From Material Movement	—	—	—	—	—	0.32	0.32	—	0.16	0.16	—	—	—	—
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
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.30	0.21	< 0.005	0.01	—	0.01	0.01	—	0.01	36.0	< 0.005	< 0.005	36.2

Dust From Material Movement	—	—	—	—	—	0.06	0.06	—	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
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.09	0.05	0.78	0.00	0.00	0.10	0.10	0.00	0.02	0.02	111	0.01	< 0.005	113
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
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
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.03	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	4.18	< 0.005	< 0.005	4.25
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
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
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	0.69	< 0.005	< 0.005	0.70
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
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

3.2. Site Preparation (2023) - Mitigated

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

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.07	39.9	28.3	0.05	1.12	—	1.12	1.02	—	1.02	5,295	0.21	0.04	5,314
Dust From Material Movement	—	—	—	—	—	7.67	7.67	—	3.94	3.94	—	—	—	—
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
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.04	1.64	1.16	< 0.005	0.05	—	0.05	0.04	—	0.04	218	0.01	< 0.005	218
Dust From Material Movement	—	—	—	—	—	0.32	0.32	—	0.16	0.16	—	—	—	—
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
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.30	0.21	< 0.005	0.01	—	0.01	0.01	—	0.01	36.0	< 0.005	< 0.005	36.2
Dust From Material Movement	—	—	—	—	—	0.06	0.06	—	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
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.09	0.05	0.78	0.00	0.00	0.10	0.10	0.00	0.02	0.02	111	0.01	< 0.005	113
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

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
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.03	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	4.18	< 0.005	< 0.005	4.25
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
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
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	0.69	< 0.005	< 0.005	0.70
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
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

3.3. Grading (2023) - Unmitigated

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

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.73	23.2	17.8	0.03	0.75	—	0.75	0.69	—	0.69	2,958	0.12	0.02	2,968
Dust From Material Movement	—	—	—	—	—	2.77	2.77	—	1.34	1.34	—	—	—	—
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
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.03	0.95	0.73	< 0.005	0.03	—	0.03	0.03	—	0.03	122	< 0.005	< 0.005	122
Dust From Material Movement	—	—	—	—	—	0.11	0.11	—	0.05	0.05	—	—	—	—
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
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.17	0.13	< 0.005	0.01	—	0.01	0.01	—	0.01	20.1	< 0.005	< 0.005	20.2
Dust From Material Movement	—	—	—	—	—	0.02	0.02	—	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
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.08	0.04	0.67	0.00	0.00	0.08	0.08	0.00	0.02	0.02	94.9	0.01	< 0.005	96.6
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
Hauling	0.08	4.47	1.07	0.05	0.07	0.93	0.99	0.07	0.25	0.32	3,626	0.08	0.57	3,805
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	3.58	< 0.005	< 0.005	3.64
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
Hauling	< 0.005	0.19	0.04	< 0.005	< 0.005	0.04	0.04	< 0.005	0.01	0.01	149	< 0.005	0.02	156
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	0.59	< 0.005	< 0.005	0.60

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
Hauling	< 0.005	0.04	0.01	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	24.7	< 0.005	< 0.005	25.9

3.4. Grading (2023) - Mitigated

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

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.73	23.2	17.8	0.03	0.75	—	0.75	0.69	—	0.69	2,958	0.12	0.02	2,968
Dust From Material Movement	—	—	—	—	—	2.77	2.77	—	1.34	1.34	—	—	—	—
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
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.03	0.95	0.73	< 0.005	0.03	—	0.03	0.03	—	0.03	122	< 0.005	< 0.005	122
Dust From Material Movement	—	—	—	—	—	0.11	0.11	—	0.05	0.05	—	—	—	—
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
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.17	0.13	< 0.005	0.01	—	0.01	0.01	—	0.01	20.1	< 0.005	< 0.005	20.2

Dust From Material Movement	—	—	—	—	—	0.02	0.02	—	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
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.08	0.04	0.67	0.00	0.00	0.08	0.08	0.00	0.02	0.02	94.9	0.01	< 0.005	96.6
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
Hauling	0.08	4.47	1.07	0.05	0.07	0.93	0.99	0.07	0.25	0.32	3,626	0.08	0.57	3,805
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	3.58	< 0.005	< 0.005	3.64
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
Hauling	< 0.005	0.19	0.04	< 0.005	< 0.005	0.04	0.04	< 0.005	0.01	0.01	149	< 0.005	0.02	156
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	0.59	< 0.005	< 0.005	0.60
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
Hauling	< 0.005	0.04	0.01	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	24.7	< 0.005	< 0.005	25.9

3.5. Building Construction (2023) - Unmitigated

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

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.62	18.9	14.3	0.02	0.69	—	0.69	0.64	—	0.64	2,397	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
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.62	18.9	14.3	0.02	0.69	—	0.69	0.64	—	0.64	2,397	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
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.20	6.20	4.70	0.01	0.23	—	0.23	0.21	—	0.21	788	0.03	0.01	791
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
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.04	1.13	0.86	< 0.005	0.04	—	0.04	0.04	—	0.04	130	0.01	< 0.005	131
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
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.17	0.09	1.49	0.00	0.00	0.18	0.18	0.00	0.04	0.04	212	0.01	0.01	216
Vendor	0.01	0.39	0.18	< 0.005	< 0.005	0.06	0.06	< 0.005	0.02	0.02	234	0.01	0.03	245
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
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.14	0.11	1.20	0.00	0.00	0.18	0.18	0.00	0.04	0.04	188	0.02	0.01	191

Vendor	0.01	0.41	0.18	< 0.005	< 0.005	0.06	0.06	< 0.005	0.02	0.02	234	0.01	0.03	245
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
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.05	0.03	0.40	0.00	0.00	0.06	0.06	0.00	0.01	0.01	64.1	< 0.005	< 0.005	65.2
Vendor	< 0.005	0.13	0.06	< 0.005	< 0.005	0.02	0.02	< 0.005	0.01	0.01	76.9	< 0.005	0.01	80.4
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
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.07	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	10.6	< 0.005	< 0.005	10.8
Vendor	< 0.005	0.02	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	12.7	< 0.005	< 0.005	13.3
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

3.6. Building Construction (2023) - Mitigated

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

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.62	18.9	14.3	0.02	0.69	—	0.69	0.64	—	0.64	2,397	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
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.62	18.9	14.3	0.02	0.69	—	0.69	0.64	—	0.64	2,397	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
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	0.20	6.20	4.70	0.01	0.23	—	0.23	0.21	—	0.21	788	0.03	0.01	791
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
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.04	1.13	0.86	< 0.005	0.04	—	0.04	0.04	—	0.04	130	0.01	< 0.005	131
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
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.17	0.09	1.49	0.00	0.00	0.18	0.18	0.00	0.04	0.04	212	0.01	0.01	216
Vendor	0.01	0.39	0.18	< 0.005	< 0.005	0.06	0.06	< 0.005	0.02	0.02	234	0.01	0.03	245
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
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.14	0.11	1.20	0.00	0.00	0.18	0.18	0.00	0.04	0.04	188	0.02	0.01	191
Vendor	0.01	0.41	0.18	< 0.005	< 0.005	0.06	0.06	< 0.005	0.02	0.02	234	0.01	0.03	245
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
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.05	0.03	0.40	0.00	0.00	0.06	0.06	0.00	0.01	0.01	64.1	< 0.005	< 0.005	65.2
Vendor	< 0.005	0.13	0.06	< 0.005	< 0.005	0.02	0.02	< 0.005	0.01	0.01	76.9	< 0.005	0.01	80.4
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
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.07	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	10.6	< 0.005	< 0.005	10.8
Vendor	< 0.005	0.02	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	12.7	< 0.005	< 0.005	13.3
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

3.7. 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	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.62	18.9	14.3	0.02	0.69	—	0.69	0.64	—	0.64	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
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.09	2.77	2.10	< 0.005	0.10	—	0.10	0.09	—	0.09	352	0.01	< 0.005	353
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
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.51	0.38	< 0.005	0.02	—	0.02	0.02	—	0.02	58.3	< 0.005	< 0.005	58.5
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
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.13	0.11	1.10	0.00	0.00	0.18	0.18	0.00	0.04	0.04	184	0.01	0.01	187
Vendor	0.01	0.40	0.18	< 0.005	< 0.005	0.06	0.06	< 0.005	0.02	0.02	231	0.01	0.03	241

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
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.01	0.16	0.00	0.00	0.03	0.03	0.00	0.01	0.01	28.0	< 0.005	< 0.005	28.5
Vendor	< 0.005	0.06	0.03	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	33.8	< 0.005	< 0.005	35.3
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
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.03	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	4.64	< 0.005	< 0.005	4.72
Vendor	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	5.60	< 0.005	< 0.005	5.85
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

3.8. Building Construction (2024) - Mitigated

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

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.62	18.9	14.3	0.02	0.69	—	0.69	0.64	—	0.64	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
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.09	2.77	2.10	< 0.005	0.10	—	0.10	0.09	—	0.09	352	0.01	< 0.005	353
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
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	0.02	0.51	0.38	< 0.005	0.02	—	0.02	0.02	—	0.02	58.3	< 0.005	< 0.005	58.5
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
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.13	0.11	1.10	0.00	0.00	0.18	0.18	0.00	0.04	0.04	184	0.01	0.01	187
Vendor	0.01	0.40	0.18	< 0.005	< 0.005	0.06	0.06	< 0.005	0.02	0.02	231	0.01	0.03	241
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
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.01	0.16	0.00	0.00	0.03	0.03	0.00	0.01	0.01	28.0	< 0.005	< 0.005	28.5
Vendor	< 0.005	0.06	0.03	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	33.8	< 0.005	< 0.005	35.3
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
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.03	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	4.64	< 0.005	< 0.005	4.72
Vendor	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	5.60	< 0.005	< 0.005	5.85
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

3.9. Paving (2024) - Unmitigated

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

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

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.50	13.3	10.6	0.01	0.58	—	0.58	0.54	—	0.54	1,512	0.06	0.01	1,517
Paving	0.71	—	—	—	—	—	—	—	—	—	—	—	—	—
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
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.36	0.29	< 0.005	0.02	—	0.02	0.01	—	0.01	41.4	< 0.005	< 0.005	41.6
Paving	0.02	—	—	—	—	—	—	—	—	—	—	—	—	—
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
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	0.07	0.05	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	6.86	< 0.005	< 0.005	6.88
Paving	< 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
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.05	0.49	0.00	0.00	0.08	0.08	0.00	0.02	0.02	82.4	< 0.005	< 0.005	83.7
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
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
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	2.34	< 0.005	< 0.005	2.38
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

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
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	0.39	< 0.005	< 0.005	0.39
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
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

3.10. Paving (2024) - Mitigated

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

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.50	13.3	10.6	0.01	0.58	—	0.58	0.54	—	0.54	1,512	0.06	0.01	1,517
Paving	0.71	—	—	—	—	—	—	—	—	—	—	—	—	—
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
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.36	0.29	< 0.005	0.02	—	0.02	0.01	—	0.01	41.4	< 0.005	< 0.005	41.6
Paving	0.02	—	—	—	—	—	—	—	—	—	—	—	—	—
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
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	0.07	0.05	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	6.86	< 0.005	< 0.005	6.88
Paving	< 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
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.05	0.49	0.00	0.00	0.08	0.08	0.00	0.02	0.02	82.4	< 0.005	< 0.005	83.7
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
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
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	2.34	< 0.005	< 0.005	2.38
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
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
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	0.39	< 0.005	< 0.005	0.39
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
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

3.11. Architectural Coating (2024) - Unmitigated

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

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.05	1.09	0.96	< 0.005	0.07	—	0.07	0.06	—	0.06	134	0.01	< 0.005	134

Architectural Coatings	7.41	—	—	—	—	—	—	—	—	—	—	—	—	—
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
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.05	1.09	0.96	< 0.005	0.07	—	0.07	0.06	—	0.06	134	0.01	< 0.005	134
Architectural Coatings	7.41	—	—	—	—	—	—	—	—	—	—	—	—	—
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
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.21	0.18	< 0.005	0.01	—	0.01	0.01	—	0.01	25.6	< 0.005	< 0.005	25.7
Architectural Coatings	1.42	—	—	—	—	—	—	—	—	—	—	—	—	—
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
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	0.04	0.03	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	4.24	< 0.005	< 0.005	4.25
Architectural Coatings	0.26	—	—	—	—	—	—	—	—	—	—	—	—	—
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
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.02	0.27	0.00	0.00	0.04	0.04	0.00	0.01	0.01	41.6	< 0.005	< 0.005	42.3
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

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
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.02	0.22	0.00	0.00	0.04	0.04	0.00	0.01	0.01	36.9	< 0.005	< 0.005	37.4
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
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
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	< 0.005	0.04	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	7.33	< 0.005	< 0.005	7.45
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
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
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	1.21	< 0.005	< 0.005	1.23
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
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

3.12. Architectural Coating (2024) - Mitigated

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

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.05	1.09	0.96	< 0.005	0.07	—	0.07	0.06	—	0.06	134	0.01	< 0.005	134
Architectural Coatings	7.41	—	—	—	—	—	—	—	—	—	—	—	—	—
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

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.05	1.09	0.96	< 0.005	0.07	—	0.07	0.06	—	0.06	134	0.01	< 0.005	134
Architectural Coatings	7.41	—	—	—	—	—	—	—	—	—	—	—	—	—
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
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.21	0.18	< 0.005	0.01	—	0.01	0.01	—	0.01	25.6	< 0.005	< 0.005	25.7
Architectural Coatings	1.42	—	—	—	—	—	—	—	—	—	—	—	—	—
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
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	0.04	0.03	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	4.24	< 0.005	< 0.005	4.25
Architectural Coatings	0.26	—	—	—	—	—	—	—	—	—	—	—	—	—
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
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.02	0.27	0.00	0.00	0.04	0.04	0.00	0.01	0.01	41.6	< 0.005	< 0.005	42.3
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
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

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.02	0.22	0.00	0.00	0.04	0.04	0.00	0.01	0.01	36.9	< 0.005	< 0.005	37.4
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
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
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	< 0.005	0.04	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	7.33	< 0.005	< 0.005	7.45
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
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
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	1.21	< 0.005	< 0.005	1.23
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
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

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	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Home Improvement Superstore	1.28	0.98	8.14	0.02	0.01	0.51	0.52	0.01	0.09	0.10	1,707	0.08	0.09	1,742
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	1.28	0.98	8.14	0.02	0.01	0.51	0.52	0.01	0.09	0.10	1,707	0.08	0.09	1,742
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Home Improvement Superstore	1.12	1.12	7.30	0.02	0.01	0.51	0.52	0.01	0.09	0.10	1,565	0.10	0.10	1,596
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	1.12	1.12	7.30	0.02	0.01	0.51	0.52	0.01	0.09	0.10	1,565	0.10	0.10	1,596
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Home Improvement Superstore	0.21	0.19	1.31	< 0.005	< 0.005	0.09	0.09	< 0.005	0.02	0.02	266	0.02	0.02	271
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	0.21	0.19	1.31	< 0.005	< 0.005	0.09	0.09	< 0.005	0.02	0.02	266	0.02	0.02	271

4.1.2. Mitigated

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

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Home Improvement Superstore	1.28	0.98	8.14	0.02	0.01	0.51	0.52	0.01	0.09	0.10	1,707	0.08	0.09	1,742
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	1.28	0.98	8.14	0.02	0.01	0.51	0.52	0.01	0.09	0.10	1,707	0.08	0.09	1,742
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Home Improvement Superstore	1.12	1.12	7.30	0.02	0.01	0.51	0.52	0.01	0.09	0.10	1,565	0.10	0.10	1,596
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	1.12	1.12	7.30	0.02	0.01	0.51	0.52	0.01	0.09	0.10	1,565	0.10	0.10	1,596
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Home Improvement Superstore	0.21	0.19	1.31	< 0.005	< 0.005	0.09	0.09	< 0.005	0.02	0.02	266	0.02	0.02	271
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	0.21	0.19	1.31	< 0.005	< 0.005	0.09	0.09	< 0.005	0.02	0.02	266	0.02	0.02	271

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	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Home Improvement Superstore	—	—	—	—	—	—	—	—	—	—	619	0.10	0.01	625
Parking Lot	—	—	—	—	—	—	—	—	—	—	57.6	0.01	< 0.005	58.1
Total	—	—	—	—	—	—	—	—	—	—	676	0.11	0.01	683
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Home Improvement Superstore	—	—	—	—	—	—	—	—	—	—	619	0.10	0.01	625
Parking Lot	—	—	—	—	—	—	—	—	—	—	57.6	0.01	< 0.005	58.1

Total	—	—	—	—	—	—	—	—	—	—	676	0.11	0.01	683
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Home Improvement Superstore	—	—	—	—	—	—	—	—	—	—	102	0.02	< 0.005	103
Parking Lot	—	—	—	—	—	—	—	—	—	—	9.53	< 0.005	< 0.005	9.63
Total	—	—	—	—	—	—	—	—	—	—	112	0.02	< 0.005	113

4.2.2. Electricity Emissions By Land Use - Mitigated

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

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Home Improvement Superstore	—	—	—	—	—	—	—	—	—	—	619	0.10	0.01	625
Parking Lot	—	—	—	—	—	—	—	—	—	—	57.6	0.01	< 0.005	58.1
Total	—	—	—	—	—	—	—	—	—	—	676	0.11	0.01	683
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Home Improvement Superstore	—	—	—	—	—	—	—	—	—	—	619	0.10	0.01	625
Parking Lot	—	—	—	—	—	—	—	—	—	—	57.6	0.01	< 0.005	58.1
Total	—	—	—	—	—	—	—	—	—	—	676	0.11	0.01	683
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Home Improvement Superstore	—	—	—	—	—	—	—	—	—	—	102	0.02	< 0.005	103
Parking Lot	—	—	—	—	—	—	—	—	—	—	9.53	< 0.005	< 0.005	9.63

Total	—	—	—	—	—	—	—	—	—	—	112	0.02	< 0.005	113

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	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Home Improvement Superstore	0.02	0.28	0.23	< 0.005	0.02	—	0.02	0.02	—	0.02	329	0.03	< 0.005	330
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
Total	0.02	0.28	0.23	< 0.005	0.02	—	0.02	0.02	—	0.02	329	0.03	< 0.005	330
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Home Improvement Superstore	0.02	0.28	0.23	< 0.005	0.02	—	0.02	0.02	—	0.02	329	0.03	< 0.005	330
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
Total	0.02	0.28	0.23	< 0.005	0.02	—	0.02	0.02	—	0.02	329	0.03	< 0.005	330
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Home Improvement Superstore	< 0.005	0.05	0.04	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	54.5	< 0.005	< 0.005	54.6
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
Total	< 0.005	0.05	0.04	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	54.5	< 0.005	< 0.005	54.6

4.2.4. Natural Gas Emissions By Land Use - Mitigated

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

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	CO2e

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Home Improvement Superstore	0.02	0.28	0.23	< 0.005	0.02	—	0.02	0.02	—	0.02	329	0.03	< 0.005	330
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
Total	0.02	0.28	0.23	< 0.005	0.02	—	0.02	0.02	—	0.02	329	0.03	< 0.005	330
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Home Improvement Superstore	0.02	0.28	0.23	< 0.005	0.02	—	0.02	0.02	—	0.02	329	0.03	< 0.005	330
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
Total	0.02	0.28	0.23	< 0.005	0.02	—	0.02	0.02	—	0.02	329	0.03	< 0.005	330
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Home Improvement Superstore	< 0.005	0.05	0.04	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	54.5	< 0.005	< 0.005	54.6
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
Total	< 0.005	0.05	0.04	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	54.5	< 0.005	< 0.005	54.6

4.3. Area Emissions by Source

4.3.2. Unmitigated

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

Source	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Consumer Products	2.25	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.14	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.75	0.04	4.56	< 0.005	0.01	—	0.01	0.01	—	0.01	18.8	< 0.005	< 0.005	18.8
Total	3.14	0.04	4.56	< 0.005	0.01	—	0.01	0.01	—	0.01	18.8	< 0.005	< 0.005	18.8
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	2.25	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.14	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	2.40	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.41	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.03	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.07	< 0.005	0.41	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	1.53	< 0.005	< 0.005	1.54
Total	0.50	< 0.005	0.41	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	1.53	< 0.005	< 0.005	1.54

4.3.1. Mitigated

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

Source	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Consumer Products	2.25	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.14	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.75	0.04	4.56	< 0.005	0.01	—	0.01	0.01	—	0.01	18.8	< 0.005	< 0.005	18.8
Total	3.14	0.04	4.56	< 0.005	0.01	—	0.01	0.01	—	0.01	18.8	< 0.005	< 0.005	18.8
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	2.25	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.14	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	2.40	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.41	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.03	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.07	< 0.005	0.41	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	1.53	< 0.005	< 0.005	1.54
Total	0.50	< 0.005	0.41	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	1.53	< 0.005	< 0.005	1.54

4.4. Water Emissions by Land Use

4.4.2. Unmitigated

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

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	CO2e

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Home Improvement Superstore	—	—	—	—	—	—	—	—	—	—	32.4	1.52	0.04	81.1
Parking Lot	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00
Total	—	—	—	—	—	—	—	—	—	—	32.4	1.52	0.04	81.1
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Home Improvement Superstore	—	—	—	—	—	—	—	—	—	—	32.4	1.52	0.04	81.1
Parking Lot	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00
Total	—	—	—	—	—	—	—	—	—	—	32.4	1.52	0.04	81.1
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Home Improvement Superstore	—	—	—	—	—	—	—	—	—	—	5.36	0.25	0.01	13.4
Parking Lot	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00
Total	—	—	—	—	—	—	—	—	—	—	5.36	0.25	0.01	13.4

4.4.1. Mitigated

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

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Home Improvement Superstore	—	—	—	—	—	—	—	—	—	—	32.4	1.52	0.04	81.1

Parking Lot	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00
Total	—	—	—	—	—	—	—	—	—	—	32.4	1.52	0.04	81.1
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Home Improvement Superstore	—	—	—	—	—	—	—	—	—	—	32.4	1.52	0.04	81.1
Parking Lot	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00
Total	—	—	—	—	—	—	—	—	—	—	32.4	1.52	0.04	81.1
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Home Improvement Superstore	—	—	—	—	—	—	—	—	—	—	5.36	0.25	0.01	13.4
Parking Lot	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00
Total	—	—	—	—	—	—	—	—	—	—	5.36	0.25	0.01	13.4

4.5. Waste Emissions by Land Use

4.5.2. Unmitigated

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

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Home Improvement Superstore	—	—	—	—	—	—	—	—	—	—	622	62.1	0.00	2,175
Parking Lot	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00
Total	—	—	—	—	—	—	—	—	—	—	622	62.1	0.00	2,175

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Home Improvement Superstore	—	—	—	—	—	—	—	—	—	—	622	62.1	0.00	2,175
Parking Lot	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00
Total	—	—	—	—	—	—	—	—	—	—	622	62.1	0.00	2,175
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Home Improvement Superstore	—	—	—	—	—	—	—	—	—	—	103	10.3	0.00	360
Parking Lot	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00
Total	—	—	—	—	—	—	—	—	—	—	103	10.3	0.00	360

4.5.1. Mitigated

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

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Home Improvement Superstore	—	—	—	—	—	—	—	—	—	—	622	62.1	0.00	2,175
Parking Lot	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00
Total	—	—	—	—	—	—	—	—	—	—	622	62.1	0.00	2,175
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Home Improvement Superstore	—	—	—	—	—	—	—	—	—	—	622	62.1	0.00	2,175

Parking Lot	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00
Total	—	—	—	—	—	—	—	—	—	—	622	62.1	0.00	2,175
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Home Improvement Superstore	—	—	—	—	—	—	—	—	—	—	103	10.3	0.00	360
Parking Lot	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00
Total	—	—	—	—	—	—	—	—	—	—	103	10.3	0.00	360

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	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Home Improvement Superstore	—	—	—	—	—	—	—	—	—	—	—	—	—	0.50
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	0.50
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Home Improvement Superstore	—	—	—	—	—	—	—	—	—	—	—	—	—	0.50
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	0.50
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Home Improvement Superstore	—	—	—	—	—	—	—	—	—	—	—	—	—	0.08

Total	—	—	—	—	—	—	—	—	—	—	—	—	—	0.08

4.6.2. Mitigated

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

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Home Improvement Superstore	—	—	—	—	—	—	—	—	—	—	—	—	—	0.50
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	0.50
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Home Improvement Superstore	—	—	—	—	—	—	—	—	—	—	—	—	—	0.50
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	0.50
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Home Improvement Superstore	—	—	—	—	—	—	—	—	—	—	—	—	—	0.08
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	0.08

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	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	CO2e

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.7.2. Mitigated

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

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

4.8.2. Mitigated

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

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

4.9.2. Mitigated

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

Equipment Type	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	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	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	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	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	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	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	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	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.4. Soil Carbon Accumulation By Vegetation Type - Mitigated

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

Vegetation	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.5. Above and Belowground Carbon Accumulation by Land Use Type - Mitigated

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

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

4.10.6. Avoided and Sequestered Emissions by Species - Mitigated

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

Species	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	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	6/5/2023	6/23/2023	5.00	15.0	—
Grading	Grading	6/26/2023	7/14/2023	5.00	15.0	—
Building Construction	Building Construction	7/17/2023	3/15/2024	5.00	175	—
Paving	Paving	3/18/2024	3/29/2024	5.00	10.0	—
Architectural Coating	Architectural Coating	1/1/2024	4/5/2024	5.00	70.0	—

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	Tier 2	3.00	8.00	367	0.40
Site Preparation	Tractors/Loaders/Backhoes	Diesel	Tier 2	4.00	8.00	84.0	0.37
Grading	Excavators	Diesel	Tier 2	1.00	8.00	36.0	0.38
Grading	Graders	Diesel	Tier 2	1.00	8.00	148	0.41
Grading	Rubber Tired Dozers	Diesel	Tier 2	1.00	8.00	367	0.40
Grading	Tractors/Loaders/Backhoes	Diesel	Tier 2	3.00	8.00	84.0	0.37

Building Construction	Cranes	Diesel	Tier 2	1.00	7.00	367	0.29
Building Construction	Forklifts	Diesel	Tier 2	3.00	8.00	82.0	0.20
Building Construction	Generator Sets	Diesel	Tier 2	1.00	8.00	14.0	0.74
Building Construction	Tractors/Loaders/Backhoes	Diesel	Tier 2	3.00	7.00	84.0	0.37
Building Construction	Welders	Diesel	Tier 2	1.00	8.00	46.0	0.45
Paving	Pavers	Diesel	Tier 2	2.00	8.00	81.0	0.42
Paving	Paving Equipment	Diesel	Tier 2	2.00	8.00	89.0	0.36
Paving	Rollers	Diesel	Tier 2	2.00	8.00	36.0	0.38
Architectural Coating	Air Compressors	Diesel	Tier 2	1.00	6.00	37.0	0.48

5.2.2. Mitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Site Preparation	Rubber Tired Dozers	Diesel	Tier 2	3.00	8.00	367	0.40
Site Preparation	Tractors/Loaders/Backhoes	Diesel	Tier 2	4.00	8.00	84.0	0.37
Grading	Excavators	Diesel	Tier 2	1.00	8.00	36.0	0.38
Grading	Graders	Diesel	Tier 2	1.00	8.00	148	0.41
Grading	Rubber Tired Dozers	Diesel	Tier 2	1.00	8.00	367	0.40
Grading	Tractors/Loaders/Backhoes	Diesel	Tier 2	3.00	8.00	84.0	0.37
Building Construction	Cranes	Diesel	Tier 2	1.00	7.00	367	0.29
Building Construction	Forklifts	Diesel	Tier 2	3.00	8.00	82.0	0.20
Building Construction	Generator Sets	Diesel	Tier 2	1.00	8.00	14.0	0.74
Building Construction	Tractors/Loaders/Backhoes	Diesel	Tier 2	3.00	7.00	84.0	0.37
Building Construction	Welders	Diesel	Tier 2	1.00	8.00	46.0	0.45
Paving	Pavers	Diesel	Tier 2	2.00	8.00	81.0	0.42
Paving	Paving Equipment	Diesel	Tier 2	2.00	8.00	89.0	0.36

Paving	Rollers	Diesel	Tier 2	2.00	8.00	36.0	0.38
Architectural Coating	Air Compressors	Diesel	Tier 2	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	50.0	20.0	HHDT
Grading	Onsite truck	—	—	HHDT
Building Construction	—	—	—	—
Building Construction	Worker	33.6	7.70	LDA,LDT1,LDT2
Building Construction	Vendor	17.2	4.00	HHDT,MHDT
Building Construction	Hauling	0.00	20.0	HHDT
Building Construction	Onsite truck	—	—	HHDT
Paving	—	—	—	—
Paving	Worker	15.0	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	6.71	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

5.3.2. Mitigated

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	50.0	20.0	HHDT
Grading	Onsite truck	—	—	HHDT
Building Construction	—	—	—	—
Building Construction	Worker	33.6	7.70	LDA,LDT1,LDT2
Building Construction	Vendor	17.2	4.00	HHDT,MHDT
Building Construction	Hauling	0.00	20.0	HHDT
Building Construction	Onsite truck	—	—	HHDT
Paving	—	—	—	—
Paving	Worker	15.0	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	6.71	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	0.00	0.00	157,301	52,434	7,057

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (Cubic Yards)	Material Exported (Cubic Yards)	Acres Graded (acres)	Material Demolished (sq. ft.)	Acres Paved (acres)
Site Preparation	0.00	0.00	22.5	0.00	—
Grading	0.00	5,999	15.0	0.00	—
Paving	0.00	0.00	0.00	0.00	2.70

5.6.2. Construction Earthmoving Control Strategies

Control Strategies Applied	Frequency (per day)	PM10 Reduction	PM2.5 Reduction
Water Exposed Area	2	61%	61%

5.7. Construction Paving

Land Use	Area Paved (acres)	% Asphalt
Home Improvement Superstore	0.00	0%
Parking Lot	2.70	100%

5.8. Construction Electricity Consumption and Emissions Factors

kWh per Year and Emission Factor (lb/MWh)

Year	kWh per Year	CO2	CH4	N2O
2023	0.00	204	0.03	< 0.005
2024	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
Home Improvement Superstore	311	311	311	113,500	1,830	1,830	1,830	667,848
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

5.9.2. Mitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
Home Improvement Superstore	311	311	311	113,500	1,830	1,830	1,830	667,848
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

5.10.1.2. Mitigated

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)
0	0.00	157,301	52,434	7,057

5.10.3. Landscape Equipment

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

5.10.4. Landscape Equipment - Mitigated

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)
Home Improvement Superstore	1,107,404	204	0.0330	0.0040	1,026,894
Parking Lot	103,028	204	0.0330	0.0040	0.00

5.11.2. Mitigated

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)
Home Improvement Superstore	1,107,404	204	0.0330	0.0040	1,026,894
Parking Lot	103,028	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)
Home Improvement Superstore	7,703,542	503,075
Parking Lot	0.00	0.00

5.12.2. Mitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Home Improvement Superstore	7,703,542	503,075
Parking Lot	0.00	0.00

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Home Improvement Superstore	1,153	0.00
Parking Lot	0.00	0.00

5.13.2. Mitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Home Improvement Superstore	1,153	0.00
Parking Lot	0.00	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
Home Improvement Superstore	Other commercial A/C and heat pumps	R-410A	2,088	< 0.005	4.00	4.00	18.0
Home Improvement Superstore	Stand-alone retail refrigerators and freezers	R-134a	1,430	0.04	1.00	0.00	1.00

5.14.2. Mitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
Home Improvement Superstore	Other commercial A/C and heat pumps	R-410A	2,088	< 0.005	4.00	4.00	18.0
Home Improvement Superstore	Stand-alone retail refrigerators and freezers	R-134a	1,430	0.04	1.00	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

5.15.2. Mitigated

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

5.18.1.2. Mitigated

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

5.18.1.2. Mitigated

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)

5.18.2.2. Mitigated

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

8. User Changes to Default Data

Screen	Justification
Land Use	Project would include a 104,867 sf furniture retail store in an 8-acre project site
Construction: Construction Phases	Construction would start in June 2023 and occur for 10 months. Overlap of building construction and architectural coating.
Construction: Off-Road Equipment	Default construction equipment with Tier 2 engine
Operations: Vehicle Data	Based on a trip generation of 311 ADT

Development Permit Application No. P22-04122

Appendix B

Biological Resources Assessment

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

March 8, 2023

Brian Saltikov, Senior Project Manager
Real Estate Development
14501 Artesia Boulevard
La Mirada, California 90638

Subject: Biological Resources Assessment for the Proposed Living Spaces Project located in City of Fresno, Fresno County, California

Dear Mr. Saltikov,

The purpose of this Biological Resources Assessment is to describe and document potential impacts to biological resources associated with the proposed Living Spaces Project (project) located at 3457 North Abby Street, southeast of the intersection of East Minarets/East Alluvial Avenue and North Abby Street, in the City of Fresno (City), Fresno County, California (refer to Figure 1; all figures provided in Attachment A). This technical information is provided for project review under the California Environmental Quality Act (CEQA) and other pertinent environmental regulations. This letter report provides a biological resources impact analysis that reflects the current environmental setting, project design, and regulatory context.

PROJECT DESCRIPTION

Based on the site plan prepared by Ktgy Architecture and Planning, dated January 18, 2023, the project involves the construction and operation of an approximately 104,867-square-foot furniture retail store in the eastern portion of the site, associated, parking on the western portion and along the northeastern boundary of the site, and utility infrastructure. Access to the site would be provided from North Abby Street. In addition, the proposed project includes a potential access connection to the project site through the adjacent Kohl's parking lot to East Alluvial Avenue which would require a cross-access covenant/agreement between the property owners of both parcels. The "project site" discussed in this report refers to all areas within the 7.75-acre property where temporary and permanent ground disturbance would occur.

PROJECT SETTING

The project site is located along the eastern portion of the San Joaquin Valley floor in Fresno County. Specifically, the project site is located on Assessor's Parcel Number 303-201-27 in the northern quarter of the United States Geological Survey (USGS) *Fresno North, California*, 7.5-minute topographic quadrangle map (refer to Figure 1).

The project site is currently undeveloped and contains one transformer/pad and a fire hydrant from the previous development (refer to Figure 2). According to historic aerial imagery, the project site was previous developed as Boomers Park (a family entertainment park) from approximately 1998 to 2017. In 2017, Boomers Park was demolished/cleared and the site has remained in its current condition since 2017. Adjacent parcels consist of North Abby Street to the west, a Kohl's department store to the north, State Route (SR 41) to the east, and a Home Depot store to the south. Some

lands in the vicinity of the project site are fallow/vacant lots; however, most of the lands are developed with a mixture of commercial developments, schools, and residential uses. There are no undisturbed open spaces in the vicinity of the project site.

The project site is located within the San Joaquin Valley Sub-region of the California Floristic Province (Baldwin, et al. 2012) and within the Gates Lake watershed (Hydrologic Unit Code # 180300090701). The project site is flat with little topographic variation and is at approximately 352 feet (107 meters) above mean sea level in elevation. There are no drainage features, depressional wetlands, or riparian areas present in the project site or immediate surroundings.

METHODS

Literature Review and Records Search

LSA Biologist Kelly McDonald conducted a literature review and records search on January 18, 2023, to identify the existence and potential for occurrence of sensitive or special-status plant and animal species[1] in the project vicinity. Federal and State lists of sensitive species were also examined. Current electronic database records reviewed included the following:

- **California Natural Diversity Data Base information (CNDDB – RareFind 5)**, which is administered by the California Department of Fish and Wildlife (CDFW), formerly known as the California Department of Fish and Game. This database covers sensitive plant and animal species, as well as sensitive natural communities that occur in California. Records from nine USGS quadrangles surrounding the project area (*Gregg, Lanes Bridge, Friant, Herndon, Fresno North, Clovis, Malaga, Fresno South and Kearney Park*), along with a query of records within a 5-mile radius of the project site, were obtained from this database to inform the field survey.

- **California Native Plant Society's (CNPS) Electronic Inventory of Rare and Endangered Vascular Plants**, which uses four specific categories or "lists" of sensitive plant species to assist with the conservation of rare or endangered botanical resources. Records from the nine USGS quadrangles surrounding the project site were obtained from this database to inform the field survey.

- **United States Fish and Wildlife Service's (USFWS) Information for Planning and Conservation (IPaC) Online System**, which lists all proposed, candidate, threatened, and endangered species managed by the Endangered Species Program of the USFWS that have the potential to occur on or near a particular site. This database also lists all designated critical habitats, national wildlife

[1] For the purposed of this report, the term "special-status species" refers to those species that are listed or proposed for listing under the California Endangered Species Act (CESA) and/or the Federal Endangered Species Act (FESA), California Fully Protected Species, and California Species of Special Concern. It should be noted that "Species of Special Concern" is an administrative designation made by the CDFW and carries no formal legal protection status. However, Section 15380 of the CEQA Guidelines indicates that these species should be included in an analysis of project impacts if they can be shown to meet the criteria of sensitivity outlined therein.

refuges, and migratory birds that could potentially be impacted by activities from a proposed project. An IPaC Trust Resource Report (USFWS 2023a) was generated for the project site.

- **Designated and Proposed USFWS Critical Habitat Polygons** were reviewed to determine whether critical habitat has been designated or proposed within or in the vicinity of the project site (USFWS 2023b).

- **The USFWS National Wetlands Inventory** was reviewed to determine whether any wetlands or surface waters of the United States have been previously identified in the survey area (USFWS 2023c).

- **eBird:** eBird is a real-time, online checklist program launched in 2002 by the Cornell Lab of Ornithology and National Audubon Society. It provides rich data sources for basic information on bird abundance and distribution at a variety of spatial and temporal scales. eBird occurrence records within the project sites and a 5-mile radius around the project site were reviewed in January 2023 (eBird 2023).

In addition to the databases listed above, historic and current aerial imagery, and local land use policies related to biological resources were reviewed.

Field Survey

A general biological survey of the project site was conducted by LSA Biologist Kelly McDonald on January 19, 2023. The project site was surveyed on foot, and all biological resources observed were noted and mapped. Suitable habitat for any species of interest or concern was duly noted, and general site conditions were photographed (Attachment B, Site Photos). The field survey took place on an overcast morning with weather conditions conducive to the detection of plant and animal species. A series of rain events passed through the region in the weeks prior to the site survey.

RESULTS

This section summarizes the environmental setting and provides further analysis of the data collected in the field. Discussions regarding the existing project site conditions, soils, vegetation communities, potentially occurring special-status biological resources, and habitat connectivity are presented below.

The project site consists of a flat area supporting disturbed non-native grassland. The vegetation existing on the site appears to be regularly maintained. There are a few small and immature Mexican fan palm (*Washingtonia robusta*; non-native species) and interior live oak (*Quercus wislizeni*) trees are located along the fence line of the southern perimeter of the project site. Much of the soil and vegetation within the project site is disturbed from the demolition of Boomers Park in 2017. Worn foot paths, litter, vehicle tracks, and trampling are evident throughout the project site.

No riparian habitat exists in the project site or on adjacent parcels and there are no depressional wetlands (e.g., vernal pools) or natural drainage features within the project site. The project site does not serve as a wildlife nursery or as a wildlife migration corridor. Further details regarding specific biological resources are provided in the following sections.

Vegetation and Land Cover Types

The project site is strictly upland in nature with dominant vegetation consisting of disturbed non-native grassland. Ongoing soil disturbance and the resulting competitive exclusion by invasive nonnative plants limit the potential for native flora to occur in the project site. No native or special-status vegetation communities exist in the project site. The acreages of each vegetation community and land cover type occurring in the project site are shown in Table A, below. Representative photographs of the project site are presented in Attachment B, and Figure 3 provides a map of these vegetation and land cover types within the project site.

Table A: Vegetation and Land Cover Types Within the Project Site

Vegetation / Land Cover Type	Acreage[1]
Developed	0.001
Disturbed/Barren	2.12
Disturbed Non-Native Grassland	5.63
Total Acres	**7.75**

[1] All presented acreages are approximate and based on geographic information system measurements.

A total of 25 vascular plant species were identified within the project site during the January 2023 field survey. See Attachment C for a complete list of species identified on the project site. The following describes the vegetation and land cover types occurring within the project site:

Developed: Developed areas consist of paved areas, buildings, and other areas that are cleared or graded for anthropogenic purposes. The transformer/pad and fire hydrant are the only developed features within the site.

Disturbed/Barren: Based on an analysis of historical aerial imagery and observations during the survey, vehicles regularly park and drive throughout the site as evinced by tire tracks and ruts. These disturbed areas lacked vegetation or supported a sparse cover of ruderal vegetation, with nonnative grasses and Russian thistle (*Salsola tragus*) being the most frequently encountered plant species. Several other invasive, pioneering plant species were also observed in these areas.

Disturbed Non-Native Grassland: This area classifies as disturbed non-native grassland due to evidence of litter, off-road vehicle tracks, worn foot paths, and previously graded areas from the demolition of the existing Boomers Park. Vegetation associated with disturbed non-native grassland consist of nonnative grasses and pioneering herbaceous plants that readily colonize disturbed ground. Nonnative grasses are present which include brome grasses (*Bromus sp.*), ripgut brome (*Bromus diandrus*), wild oats (*Avena fatua*), and Dallis grass (*Paspalum dilatatum*). Other dominant plants within this area include weedy or pioneering species such as: prickly lettuce (*Sonchus asper*), Russian thistle, Musky stork's bill (*Erodium moschatum*), and Shepherd's purse (*Capsella bursa-pastoris*). A few small and immature Mexican fan palm (*Washingtonia robusta*; non-native species) and interior live oak (*Quercus wislizeni*) occur along the fence line of the southern perimeter of the project site.

Soils

According to the Natural Resource Conservation Service (NRCS) online soil survey of Eastern Fresno County, the project site is composed of San Joaquin loam, shallow, 0 to 3 percent slopes as shown on Figure 4 and described in Table Be below.

Table B: Soil Type Information

Map Unit Symbol	Map Unit Name	Parent Material	Drainage Class	Hydric
SgA	San Joaquin loam, shallow, 0 to 3 percent slopes	Alluvium derived from granite	Moderately well drained	No

Compiled: NRCS (January 2023)

Wildlife

A total of seven wildlife species were observed on or near the project site during the January 2023 survey, including: American crow (*Corvus brachyrhynchos*), house finch (*Haemorhous mexicanus*), white-crowned sparrow (*Zonotrichia leucophrys*), black phoebe (*Sayornis nigricans*), California scrub jay (*Aphelocoma californica*), European starling (*Sturnus vulgaris*; nonnative species), and California ground squirrel (*Otospermophilus beecheyi*). Each of the wildlife species observed commonly occur in and around developed areas throughout the San Joaquin Valley.

Migratory bird species may utilize the project site for foraging; however, the usage is likely transient and limited to species that forage over open areas. The project site does not possess any characteristics that would indicate a locally significant stopover point for migratory species including raptors or waterfowl. No known wildlife movement corridors occur within the project site or in the immediate vicinity.

SPECIAL-STATUS BIOLOGICAL RESOURCES

The Fresno region supports various special-status natural communities, plants, and animals. Attachment D provides tables that identify those special-status plant and animal species known to occur or that potentially occur in the vicinity of the project site (based on the literature review and experience in the region) and includes detailed information about each species' habitat and distribution, State and Federal status designations, and probability of occurrence within the project site. As stated in the methodology section above, the background research included occurrence records from nine USGS topographic quadrangles surrounding the survey area. A nine USGS quadrangle search covers a large, variable geographic and topographic area containing numerous habitat types not found within or around the project site. The following species are not included in Attachment D because suitable nesting habitat does not occur in the project site or in the immediate vicinity, or the project site is outside of the species' known current range: great egret (*Ardea alba*; nesting colonies), snowy egret (*Egretta thula*; nesting colonies), double-crested cormorant (*Nannopterum auritum*; nesting colonies), and black-crowned night heron (*Nycticorax nycticorax*; nesting colonies).

The following subsections provide specific discussions for special-status natural communities, plant and animal species, and habitats of concern (including critical habitat, jurisdictional aquatic resources, wildlife movement corridors, and regional and local habitat conservation plans).

Special-Status Natural Communities

The CNDDB search identified occurrences of four special-status natural (i.e., plant) communities, Great Valley mixed Riparian Forest, Northern Claypan Vernal Pool, Norther Hardpan Verna Pool, and Sycamore Alluvial Woodland, within the nine-quad search area.[1] These habitat types do not occur within the project site or in the immediate vicinity.

No special-status natural communities or conservation areas exist within the project site or in adjacent parcels. The project site is completely isolated and distant from all special-status natural communities that occur in the region**.**

Special-Status Plants

Attachment D contains tables that identify special-status species known to occur or that potentially occur in the vicinity of the project site and include detailed information about each species' habitat and distribution, activity period, listing/status designations, and probability of occurrence within the project site boundaries. These species were compiled from the CNPS, CNDDB, and IPaC records searches from a 5-mile radius around the project site and from LSA's extensive knowledge and experience in the region.

The literature review identified 14 special-status plant species that are known to occur within a nine-quad radius of the project site (refer to Attachment D). The majority of the rare plant species that were identified in the databases have specialized habitat requirements (i.e., they occur on predominantly alkaline soils, vernal pools, riparian, or wetland habitats, etc.) that do not occur within the project site.

Historic anthropogenic disturbances have greatly altered the natural hydrologic regimes and have either eliminated or greatly impacted the pre-settlement habitats needed to support the special-status plant species identified in the CNDDB and CNPS queries. As such, the specific habitats, soil substrates or "micro-climates" necessary for special-status plant species to occur are absent within the boundaries of the project site. Based on site observations coupled with the habitat suitability analysis, no special-status plant species are expected to occur within the project site. It is also unlikely that any source populations exist in adjacent or nearby parcels.

Special-Status Animals

The historic anthropogenic disturbances in the project site and adjacent parcels (i.e., urban development, roads and highways, etc.) have greatly altered, eliminated, or impacted the pre-settlement habitats needed to support most of the special-status animal species identified in the CNDDB and USFWS queries (refer to Attachment D). There are no known occurrences of any special-status animal species in the project site, and none were observed during the January 2023 field survey. Nonetheless, marginally suitable, isolated habitat for several regionally occurring special-status species is present in the project site and those species are discussed in further detail below.

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[1] The CNDDB uses sensitive vegetation community names described in the Preliminary Descriptions of the Terrestrial Natural Communities of California (Holland 1986). No new sensitive natural community records have been added to the CNDDB since the 1990s. Therefore, natural communities mapped by the CNDDB are limited.

One special-status animal species, burrowing owl (*Athene cunicularia*) has low potential to occur in the project site due to the presence of potentially suitable habitat and/or known records in the project vicinity. However, no sign which would indicate occupation or use by this species (e.g., scat, tracks, whitewash, prey remains, or any other sign) was identified. Several small mammal burrows, including active California ground squirrel burrows were observed within the disturbed non-native grassland habitats in the project site. None of the small mammal burrows observed in the project site exhibited features typical of occupied burrowing owl burrows, although the species is highly mobile and there is some potential for use by these species in the future.

The project site contains marginal foraging habitat for certain raptors such as the Swainson's hawk (*Buteo swainsoni*), although suitable tree-nesting habitat for this species is absent from the project site. The Mexican fan palms and interior live oaks trees are immature and small in stature and do not provide conducive nesting habitat for Swainson's hawk or other raptor species. Suitable avian nesting habitat in the project site is mostly limited to that which supports ground-nesting species such as California horned lark (*Eremophila alpestris actia*) and other birds that may nest on the ground or in the annual herbaceous cover. Mature Palm and oak trees in the vicinity and along the perimeter outside of the site in the adjacent parcels could be used by raptors and other tree-nesting species. Overall, the project site and immediate surroundings contain foraging and nesting habitat for a variety of bird species that are protected while nesting under the Migratory Bird Treaty Act and California Fish and Game Code.

The evaluation of special-status animal species occurrence within the project site was based on a habitat suitability analysis. It did not include exhaustive surveys to determine their presence or absence, but did include direct observation of on-site and off-site conditions and a review of the available recorded occurrence data from the area to conclude whether or not a particular species could be expected to occur. Based on this analysis, it is unlikely that the remaining special-status wildlife species listed in Attachment D would occupy or otherwise utilize the habitat present within the project site. Significant adverse impacts to special-status wildlife species are not anticipated with the implementation of the recommended impact avoidance, minimization, and mitigation measures described in further detail below.

Critical Habitat

The project site is not located within designated critical habitat for any species.

Wetlands and Potential Jurisdictional Aquatic Resources

The project site is strictly upland in nature with moderately well-drained soils. Based on historical aerial imagery, an irrigation ditch was historically located on the western side of the site. However, the ditch was either placed underground or rerouted prior to 1998. There are no wetlands, riparian areas, or potential jurisdictional drainage features currently present within the project site.

Wildlife Movement and Habitat Connectivity

The project site is isolated from natural areas and it is unlikely that the site serves as an important corridor for animals moving locally, regionally, or in broader migrations. Migratory bird species may utilize the project site for foraging; however, the usage is likely transient and limited to species that

forage over open grassland areas. The project site does not possess any characteristics that would indicate a locally significant stopover point for migratory species including raptors or waterfowl.

No known wildlife movement corridors occur within the project site or in the immediate vicinity.

Regional Habitat Conservation Plans and Local Policies

The City of Fresno and Fresno County currently does not have a regional Natural Community Conservation Plan (NCCP) or Habitat Conservation Plan (HCP). The 2030 General Plan for the City of Fresno outlines local relevant policies related to biological resources. Below is the list of relevant polices from the City of Fresno General Plan:

- Parks Open Space and Schools (POSS)-5-a Habitat Area Acquisition. Support federal, State, and local programs to acquire significant habitat areas for permanent protection and/or conjunctive educational and recreational use.

- POSS-5-b Habitat Conservation Plans. Participate in cooperative, multijurisdictional approaches for area-wide habitat conservation plans to preserve and protect rare, threatened, and endangered species.

- POSS-5-c Buffers for Natural Areas. Require development projects, where appropriate and warranted, to incorporate natural features (such as ponds, hedgerows, and wooded strips) to serve as buffers for adjacent natural areas with high ecological value.

- POSS-5-d Guidelines for Habitat Conservation. Establish guidelines for habitat conservation and mitigation programs, including:

    - Protocols for the evaluation of a site's environmental setting and proposed design and operating parameters of proposed mitigation measures.

    - Methodology for the analysis depiction of land to be acquired or set aside for mitigation activities.

    - Parameters for specification of the types and sources of plant material used for any re-vegetation, irrigation requirements, and post-planting maintenance and other operational measures to ensure successful mitigation.

    - Monitoring at an appropriate frequency by qualified personnel and reporting of data collected to permitting agencies.

- POSS-5-e Pursue development of conjunctive habitat and recreational trail uses in flood control and drainage projects.

- POSS-5-f Regional Mitigation and Habitat Restoration. Coordinate habitat restoration programs with responsible agencies to take advantage of opportunities for a coordinated regional mitigation program.

- POSS-5-g Assistance in Valley Arboretum Master Planning. Assist community organizations that have raised grant funds to pursue the preparation of a Valley Arboretum Master Plan and Implementation Program, including funding, to be coordinated with community groups, as well as related plans and policies for established neighborhoods and other areas with park deficiencies.

- POSS-6-a San Joaquin River Parkway Master Plan. Support the San Joaquin River Conservancy in its efforts to update the San Joaquin River Parkway Master Plan by working with the other jurisdictions and the River Conservancy to create a comprehensive and feasible plan for preservation, conservation, and Parkway development.

- POSS-6-b Effects of Stormwater Discharge. Support efforts to identify and mitigate cumulative adverse effects on aquatic life from stormwater discharge to the San Joaquin River.

    - Avoid discharge of runoff from urban uses to the San Joaquin River or other riparian corridors.

    - Approve development on sites having drainage (directly or indirectly) to the San Joaquin River or other riparian areas only upon a finding that adequate measures for preventing pollution of natural bodies of water from their runoff will be implemented.

    - Periodically monitor water quality and sediments near drainage outfalls to riparian areas. Institute remedial measures promptly if unacceptable levels of contaminant(s) occur.

According to the Landscape Plan, two trees located outside the project site will be removed as part of the connection to the proposed driveways along East Alluvial Avenue. The current landscaping along the southern perimeter of the project site will remain in place. However, the two trees proposed to be removed might be subject to the City of Fresno's tree removal permit as described the City of Fresno *Municipal Code Article 23 Landscape* (City of Fresno 2023). If the trees to be removed are fruit trees and trees of the genus Myrtaceae with a 12-inch diameter or 38-inch circumference, those trees are considered protected. The applicant would follow the guidelines outlined in *Article 23 Landscape, Section 15-2308, D. Tree Removal Permit/Application Requirements.*

IMPACT FINDINGS

Special-Status Natural Communities

The project site does not contain any special-status natural communities and such habitats would not be impacted by the proposed project. No mitigation is required.

Special-Status Species

No special-status plant species are expected to occur within the project site or to be adversely affected by the proposed project, and no mitigation is required.

While no special-status animal species (or signs of such species) were observed on site during the January 2023 survey, California ground squirrel burrows that could be used by burrowing owl were observed in portions of the project site. None of the California ground squirrel burrows observed in the project site exhibited features typical of occupied burrowing owl burrows at the time of the survey, although there is some potential for use by this species in the future. Potentially significant direct and/or indirect impacts, including mortality, harassment, or other forms of incidental take, could occur if construction-related ground disturbance occurs in or around an occupied burrow.

While suitable habitat for shrub and tree nesting birds is almost absent on the project site (only small immature Mexican fan palm and interior live oaks occur along the perimeter of the site), the project site and immediate surroundings that could be subjected to indirect disturbances during construction do contain suitable nesting habitat for a variety of tree and ground-nesting birds and for other birds that could nest in the annual herbaceous vegetation. Nesting birds are protected under the California Fish and Game Code. Construction activities that occur during the nesting bird season (typically February 15 through September 15) have potential to result in the direct or indirect take of nesting birds.

If unmitigated or avoided, these potential direct and indirect impacts on special-status wildlife species and nesting birds could be considered potentially significant. However, implementation of Mitigation Measures BIO-1 through BIO-2, as summarized below, would effectively mitigate any impacts on special-status wildlife species to less-than-significant levels.

Critical Habitat

The project would not result in any impacts to designated critical habitat, and no additional mitigation is required.

Wetlands and other Aquatic Resources

The project would not result in any impacts to jurisdictional aquatic resources, and no mitigation is required.

Wildlife Movement

The proposed project would not place any barriers within any known wildlife movement corridors or interfere with habitat connectivity, and no mitigation related to wildlife movement is required.

Regional Habitat Conservation Plans and Local Polices

Because the project would not impact any sensitive biological resources, special-status species, or jurisdictional aquatic features, the project would not conflict with any local policies or ordinances protecting biological resources. If any tree removal is expected to occur, the applicant would be subject to the *Article 23 Landscape, Section 15-2308, D. Tree Removal Permit/Application Requirements,* therefore making the project not conflict any tree removal policies.

RECOMMENDED IMPACT AVOIDANCE AND MINIMIZATION MEASURE

The following measure is recommended to be implemented to avoid, minimize, and/or mitigate impacts on nesting birds.

Mitigation Measure BIO-1: **Conduct Preconstruction Clearance Surveys for Burrowing Owl.** A preconstruction clearance survey is required for burrowing owl no more than 30 calendar days prior to initiation of project activities. All survey results must be delivered to the City of Fresno. If an active burrowing owl burrow is found within the project site, the applicant must coordinate with CDFW to obtain applicable agency approval/direction prior to any ground disturbance activities on the site. Specific avoidance, den excavation, passive relocation, and compensatory mitigation activities shall be performed as required by CDFW. If no active burrowing owl burrows are identified, project activities may proceed as planned following the preconstruction survey.

Mitigation Measure BIO-2: **Nesting Bird Surveys and Avoidance.** If vegetation removal, construction, or grading activities are planned to occur within the active nesting bird season (February 15 through September 15), a qualified biologist shall conduct a preconstruction nesting bird survey no more than 5 days prior to the start of such activities. The nesting bird survey shall include the project site and areas immediately adjacent to the site that could potentially be affected by project-related activities such as noise, vibration, increased human activity, and dust, etc. For any active nest(s) identified, the qualified biologist shall establish an appropriate buffer zone around the active nest(s). The appropriate buffer shall be determined by the qualified biologist based on species, location, and the nature of the proposed activities. Project activities shall be avoided within the buffer zone until the nest is deemed no longer active by the qualified biologist. Documentation of all survey results shall be provided to the City.

CONCLUSION

Based on field observations coupled with the habitat suitability analysis conducted for this assessment, the project is not expected to impact regionally occurring special-status plant or wildlife species. The project would not impact any special-status natural communities, jurisdictional aquatic features, or other habitats of concern. Successful implementation of the recommended avoidance measures defined above (BIO-1 and BIO-2) would avoid impacts on burrowing owl and nesting birds and ensure compliance with the Migratory Bird Treaty Act and applicable provisions of the California Fish and Game Code.

If you have any questions regarding this letter report, please contact Kelly McDonald at (805) 782-0745.

Sincerely,
LSA Associates, Inc.

Kelly McDonald

Attachments: A: Figures 1-4
B: Representative Site Photographs
C: Vascular Plant Species Observed
D: Summary of Special-Status Species

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ATTACHMENT A

FIGURES 1-4

ATTACHMENT B

REPRESENTATIVE SITE PHOTOGRAPHS

ATTACHMENT C

VASCULAR PLANT SPECIES OBSERVED

VASCULAR PLANT SPECIES OBSERVED

The following vascular plant species were observed in the project site by LSA biologist Kelly McDonald on January 19, 2023.

* introduced species not native to California

EUDICOTS	
Asteraceae	**Sunflower Family**
Amsinckia intermedia	Common fiddleneck
*Centaurea solstitialis**	Yellow-star thistle
Erigeron canadensis	Canada horseweed
Heterotheca grandiflora	Telegraph weed
*Lactuca serriola**	Prickly lettuce
*Senecio vulgari**	Common groundsel
*Sonchus asper**	Prickly sow thistle
Brassicaceae	**Mustard Family**
*Capsella bursa-pastoris**	Shepherd's purse
*Lepidium didymium**	Lesser swine cress
Caryophyllaceae	**Pink Family**
*Stellaria media **	Chickweed
Chenopodiaceae	**Goosefoot Family**
*Salsola tragus**	Russian thistle
Fabaceae	**Pea Family**
*Trifolium sp.**	Clover
Fagaceae	**Beech Family**
Quercus wislizeni	Interior live oak
Geraniaceae	**Geranium Family**
*Erodium botrys**	Broad leaf filaree
*Erodium moschatum**	Musky stork's bill
Lamiaceae	**Mint Family**
*Rosmarinus officinalis**	Rosemary
Oleaceae	**Olive Family**
*Ligustrum lucidum**	Glossy privet
Rosaceae	**Rose Family**
Heteromeles arbutifolia	Toyon
Solanaceae	**Nightshade family**
Datura wrightii	Jimsonweed
Solanum americanum	American black nightshade
MONOCOTS	
Arecaceae	**Palm Family**
*Washingtonia robusta**	Mexican fan palm
Poaceae	**Grass Family**
*Avena fatua**	Wild oat
*Bromus diandrus**	Ripgut brome
*Bromus sp.**	Brome grass
*Paspalum dilatatum**	Dallis grass

ATTACHMENT D

SUMMARY OF SPECIAL-STATUS SPECIES

Development Permit Application No. P22-04122

Appendix C

Cultural Resources Survey

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

March 7, 2023

Brian Saltikov, Senior Project Manager
Living Spaces Real Estate Development
14501 Artesia Boulevard
La Mirada, California 90638

Subject: Cultural Resources Survey Study for the Living Spaces Project in Fresno, Fresno County, California (LSA Project No. LSP2201)

Dear Mr. Saltikov:

LSA conducted a cultural resources survey study (study) for the proposed Living Spaces Project (project) in Fresno, Fresno County, California. Study work (which consisted of background research and a field survey) was completed per the requirements of the California Environmental Quality Act of 1970 (CEQA).

This study was prepared to: (1) identify archaeological deposits that may meet the CEQA definition of a historical resource (California Public Resources Code [PRC] Section 21084.1) or a unique archaeological resource (PRC Section 21083.2) and that may be impacted by the proposed project; (2) assess the potential for human remains; and (3) recommend best practices and procedures that may be utilized with respect to archaeological resources, if warranted. This report has been prepared by Associate/Senior Cultural Resources Manager Kerrie Collison, M.A., Registered Professional Archaeologist (RPA) 28731436.

PROJECT LOCATION AND DESCRIPTION

The approximately 8-acre project site is depicted on the United States Geological Survey (USGS) *Fresno North, California* 7.5-minute topographic quadrangle map in Section 33 of Township 12 South, Range 20 East, Mount Diablo Baseline and Meridian (USGS 1981; Figure 1 [all figures are provided in Attachment B). It consists of the entirety of Assessor's Parcel Number 303-201-27, southeast of the intersection of East Minarets/East Alluvial Avenue and North Abby Street (Figure 2).

The proposed project involves the construction and operation of a furniture retail store in the eastern portion of the project site, associated parking on the western portion and along the northeastern boundary of the project site, and utility infrastructure. Access to the project site would be provided from North Abby Street. In addition, the proposed project includes a potential access connection to the project site through the adjacent Kohl's parking lot to East Alluvial Avenue, which would require a cross-access covenant/agreement between the property owners of both parcels.

BACKGROUND RESEARCH

Southern San Joaquin Valley Information Center

On January 23, 2023, Celeste M. Thomson (Coordinator at the Southern San Joaquin Valley Information Center [SSJVIC]) conducted a record search at the SSJVIC of the California Historical Resources Information System at California State University, Bakersfield. The SSJVIC, an affiliate of

the California Office of Historic Preservation, is the official repository of cultural resource records and reports for Fresno County. The record search included a review of all recorded historic-period and prehistoric cultural resources within a 0.5-mile radius of the project site, as well as a review of known cultural resource surveys and excavation reports.

The record search results (SSJVIC File No. 23-017; Attachment C) indicate that two previous cultural resources studies included a portion or the entirety of the project site and that six previous cultural resources studies have included a portion of the 0.5-mile search radius. The previous cultural studies that included a portion and the entirety of the project site (FR-00384 and FR-00577, respectively) were both surveys. The six previous studies (FR-00383, FR-00398, FR-01572, FR-01685, FR-02568, and FR-02955) were also surveys. An estimated 50 percent of the project site and 0.5-mile radius has been studied. As a result of previous cultural resources studies, no cultural resources have been recorded in the project site or within 0.5 mile.

Aerial Photographs and Maps

Aerial photographs and historic maps that include the project site were also reviewed (USGS n.d.; NETR n.d.). The results of the review are presented in Table A.

Table A: Aerial Photograph and Historic Map Review

Map/Photograph	Results
1921 *Bullard, California* map (Scale 1:31,680)	The project site is not developed with any buildings.
1946 *Fresno North, California* map (Scale 1:24,000)	The project site is not developed with any buildings.
1955 *Fresno, California* map (Scale 1:250,000)	The project site is not developed with any buildings.
1957 aerial photograph	The project site not developed with any buildings. A seeming man-made irrigation channel transects the project site.
1962 aerial photograph	No change from the 1957 aerial photograph.
1965 *Herndon, California* map (Scale 1:62,500)	The project site is not developed with any buildings.
1972 and 1984 aerial photographs	No change from the 1957 aerial photograph.
1998 aerial photograph	The project site has been developed as a Boomers Park (a family entertainment park).
2016 aerial photograph	The project site remains a Boomers Park.
2018 aerial photograph	Boomers Park has been demolished, and the project site has been cleared of all buildings and parking lots.

Compiled by LSA (2023) from United States Geological Survey (n.d.) and National Environmental Title Research (n.d.).

Native American Heritage Commission

LSA submitted a request to the Native American Heritage Commission (NAHC) to request a review of the Sacred Lands File (SLF) for the presence of Native American cultural resources that the proposed project might impact. The NAHC maintains the SLF database and is the official State repository of Native American sacred-site location records in California.

Cameron Vela, NAHC Cultural Resources Analyst, responded on February 7, 2023, that the SLF search resulted in negative findings for sacred lands in the vicinity of the project site (Attachment D).

Additional Background Research

Soil surveys (USDA n.d.) indicate that near surficial natural sediments within the project site are entirely San Joaquin loam, which typically consist of loam from 0 to 18 inches deep, clay from 18 to 22 inches deep, cemented material from 22 to 36 inches deep, and coarse sandy loam from 36 to 60 inches deep. Geologic deposits exist under surficial sediments of the project site, specifically older alluvium, lake, playa, and terrace deposits that date to the Pleistocene (2.58 million to 11,700 years ago) (CGS 2015). While not mapped by soil surveys, artificial fill is also likely present on the project site as a result of the prior construction of Boomers Park and associated infrastructure.

ARCHAEOLOGICAL FIELD SURVEY

On February 10, 2023, LSA archaeologist Kerrie Collison conducted a pedestrian survey of the project site. The survey was conducted utilizing transects spaced fewer than 10 meters apart and included the entire project site, with special attention paid to rodent burrow holes and aprons. It was noted that the project site mainly consists of gravel, maintained nonnative grasses, and bladed dirt and gravel roads. Existing infrastructure (such as a hydrant; Photograph 1) and a utility access box were observed, both of which indicate the occurrence of previous ground disturbance for installation of utility lines. Ground visibility was approximately 40 percent overall due to gravel and grass ground cover (Photograph 2). No archaeological cultural resources were identified during the field survey.

Photograph 1: Existing hydrant in center of project site. View northeast.

Photograph 2: Example ground cover within project site. View west.

SUMMARY AND RECOMMENDATIONS

This study consisted of background research and a field survey. No human remains or archaeological resources were identified within the project site as a result of the cultural resources survey study. Given the heavy previous disturbance of the project site (evidenced by aerial photograph records of the construction of Boomers Park between 1984 and 1998 and the remnant hydrants and utility access boxes), it is unlikely that construction activities associated with project implementation will impact cultural resources.

Given the above factors, the potential for the project to impact cultural resources is low, and no further cultural studies are recommended for this project. However, LSA recommends the following steps be implemented to address the inadvertent discovery of prehistoric (Native American) or historic-period archaeological resources and to address the inadvertent discovery of human remains:

- In the event that archaeological resources are identified during project activities, work shall be halted immediately within 25 meters of the find until a qualified professional archaeologist is contacted to assess the nature and significance of the find and determine if any additional study or treatment of the find is warranted. The archaeologist shall develop proper mitigation measures required for the discovery per California Code of Regulations [CCR], Title 14, Chapter 3, Section 15064.5(f)). Additional studies could include, but would not be limited to, collection and documentation of artifacts, documentation of the cultural resources on State of California Department of Parks and Recreation Series 523 forms, or subsurface testing. If determined appropriate by the qualified archaeologist, archaeological monitoring shall commence and

continue until grading and excavation are complete or until the monitoring archaeologist determines, based on field observations and in consultation with the qualified archaeologist, that there is little likelihood of encountering additional archaeological cultural resources. Archaeological monitoring may be reduced from full-time to part-time or spot-checking if determined appropriate by the qualified archaeologist based on monitoring results. Upon completion of any monitoring activities, the archaeologist shall prepare a report to document the methods and results of monitoring activities. The final version of this report shall be submitted to the SSJVIC.

- In the event that human remains are encountered at any time during project work, State Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the Fresno County Coroner has made a determination of origin and disposition pursuant to State PRC Section 5097.98. The County Coroner must be notified of the find immediately. If the remains are determined to be Native American, the County Coroner would notify the NAHC within 24 hours, which would determine and notify a Most Likely Descendant (MLD). With the permission of the landowner or his/her authorized representative, the MLD may inspect the site of the discovery. The MLD shall complete the inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site. The MLD's recommendations may include scientific removal and nondestructive analysis of human remains and items associated with Native American burials, preservation of Native American human remains and associated items in place, relinquishment of Native American human remains and associated items to the descendants for treatment, or any other culturally appropriate treatment.

If you have any questions concerning the content of this letter report, please contact me at kerrie.collison@lsa.net.

Sincerely,

LSA Associates, Inc.

Kerrie N Collison

Kerrie Collison, M.A., RPA 28731436
Associate/Senior Cultural Resources Manager

Attachments: A—References
B—Figures 1 and 2
C—Record Search Results
D—Sacred Lands File Search Results

ATTACHMENT A

REFERENCES

California Geological Survey (CGS)
2015 Geologic Map of California. Website: https://maps.conservation.ca.gov/cgs/gmc/ (accessed March 2, 2023).

National Environmental Title Research (NETR)
n.d. Historic Aerials. Website: http://www.historicaerials.com (accessed March 2, 2023).

United States Department of Agriculture Natural Resources Conservation Service (USDA)
n.d. Web Soil Survey. Website: http://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx (accessed March 2, 2023).

United States Geological Survey (USGS)
1981 *Fresno North, California* 7.5-minute topographic quadrangle. Prepared in 1965. Photorevised in 1981. Denver, Colorado.

n.d. USGS topoView. Website: https://ngmdb.usgs.gov/topoview/viewer/#4/39.98/-100.02 (accessed March 2, 2023).

ATTACHMENT B

FIGURES 1 AND 2

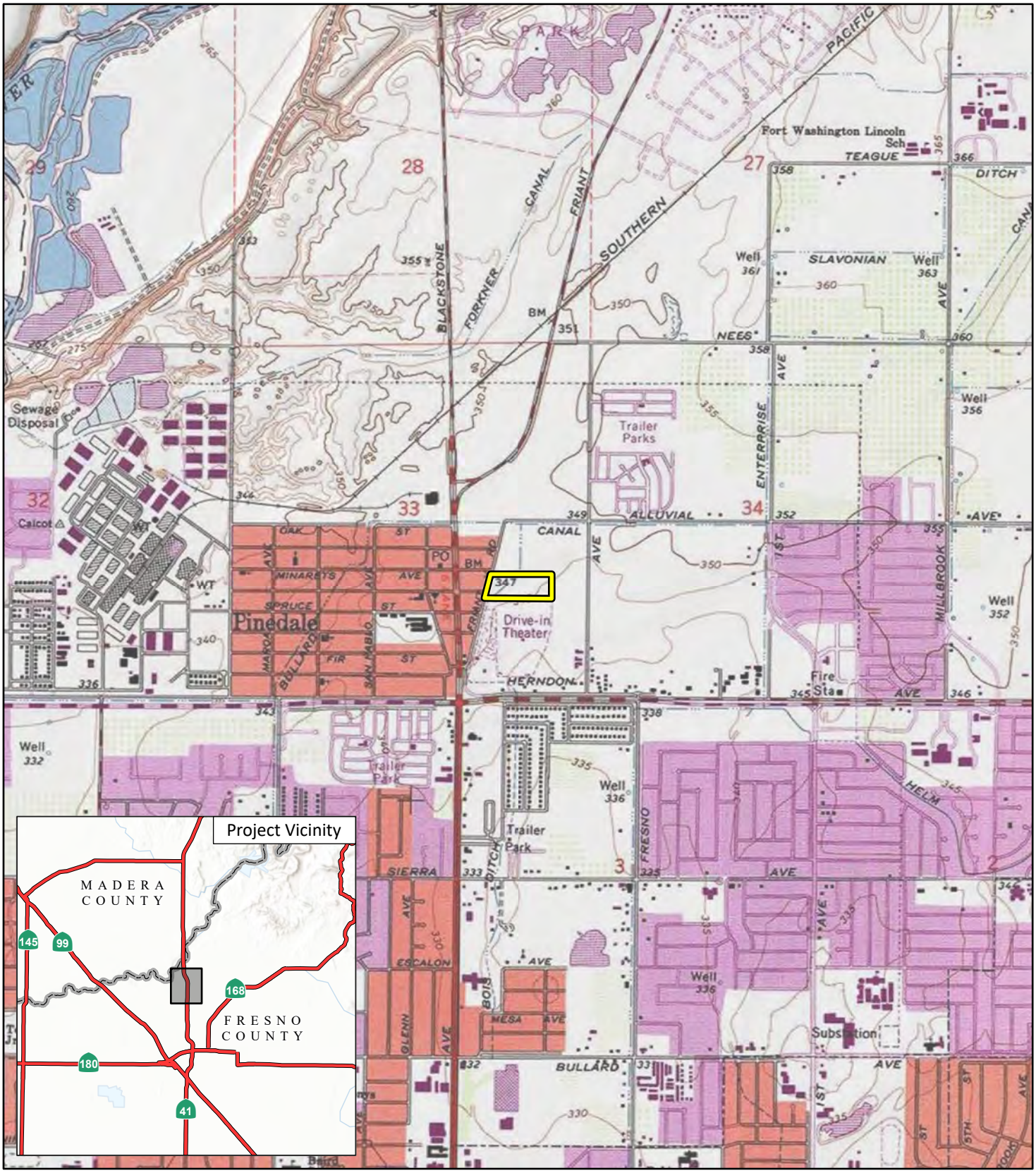


FIGURE 1

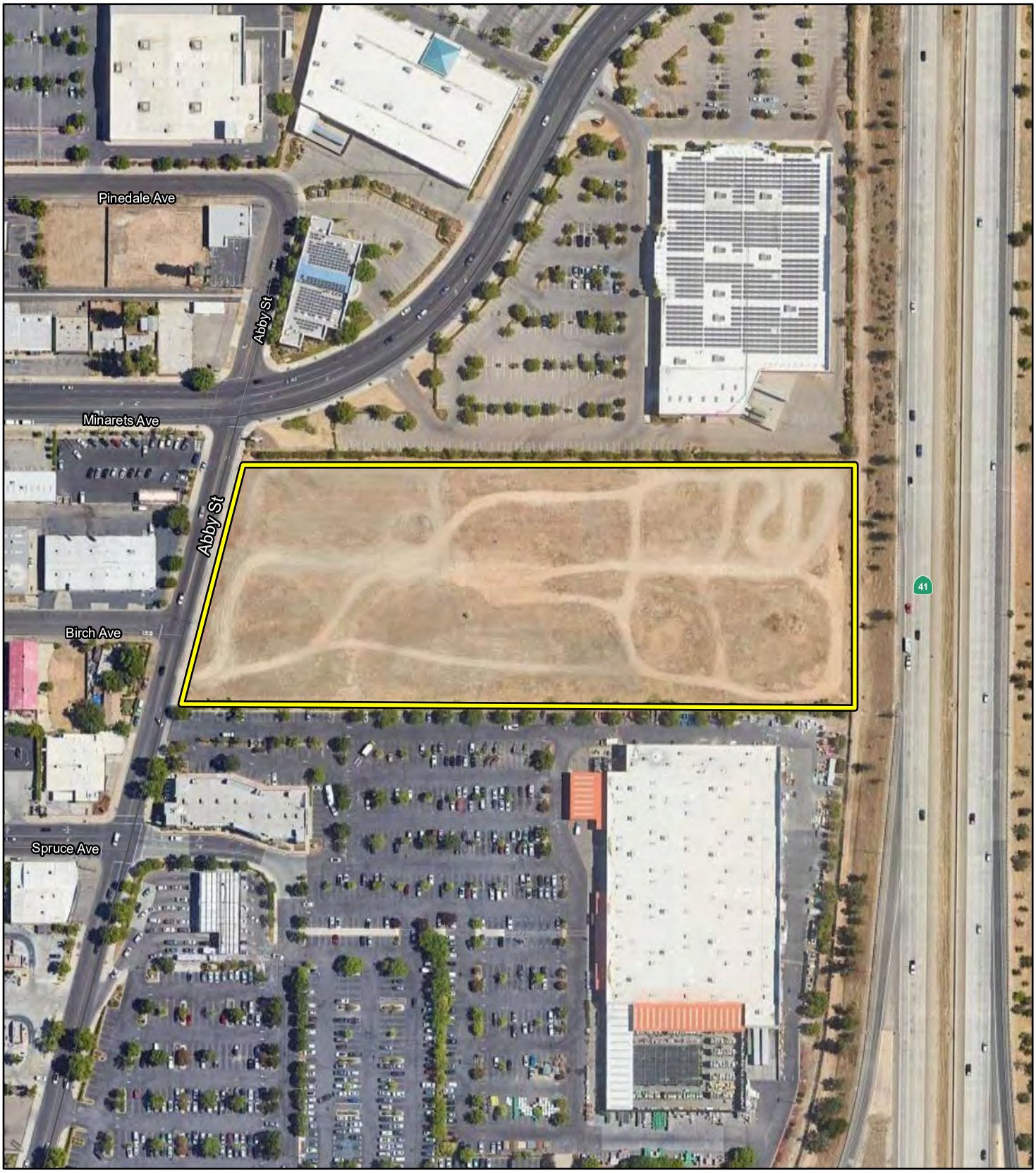
0 1000 2000
FEET

SOURCE: USGS *Fresno North (1981)*, CA

Living Spaces Fresno Project

Project Location

J:\LSP2201\GIS\Pro\Living Spaces Fresno Project\Living Spaces Fresno Project.aprx (1/13/2023)



LSA

Project Location

FIGURE 2

N

0 100 200
FEET

SOURCE: Google Imagery (2020)

J:\LSP2201\GIS\Pro\Living Spaces Fresno Project\Living Spaces Fresno Project.aprx (1/13/2023)

Living Spaces Fresno Project

Project Site

ATTACHMENT C

RECORD SEARCH RESULTS

California Historical Resources Information System

Fresno
Kern
Kings
Madera
Tulare

Southern San Joaquin Valley Information Center
California State University, Bakersfield
Mail Stop: 72 DOB
9001 Stockdale Highway
Bakersfield, California 93311-1022
(661) 654-2289
E-mail: ssjvic@csub.edu
Website: www.csub.edu/ssjvic

1/23/2023

Kerrie Collison
LSA
285 South Street, Suite P
San Luis Obispo, CA 93401

Re: Living Spaces Fresno Project (LSP2201)
Records Search File No.: 23-017

The Southern San Joaquin Valley Information Center received your record search request for the project area referenced above, located on the Fresno North USGS 7.5' quad. The following reflects the results of the records search for the project area and the 0.5 mile radius:

As indicated on the data request form, the locations of resources and reports are provided in the following format: ☒ custom GIS maps ☐ GIS data

Resources within project area:	None
Archaeological resources within 0.5 mile radius:	None
Reports within project area:	FR-00384, 00577
Reports within 0.5 mile radius:	FR-00383, 00398, 01572, 01685, 02568, 02955

Resource Database Printout (list):	☐ enclosed	☐ not requested	☒ nothing listed
Resource Database Printout (details):	☐ enclosed	☐ not requested	☒ nothing listed
Resource Digital Database Records:	☐ enclosed	☒ not requested	☐ nothing listed
Report Database Printout (list):	☒ enclosed	☐ not requested	☐ nothing listed
Report Database Printout (details):	☒ enclosed	☐ not requested	☐ nothing listed
Report Digital Database Records:	☐ enclosed	☒ not requested	☐ nothing listed
Resource Record Copies:	☐ enclosed	☐ not requested	☒ nothing listed
Report Copies:	☐ enclosed	☒ not requested	☐ nothing listed
OHP Built Environment Resources Directory:	☐ enclosed	☒ not requested	☐ nothing listed
Archaeological Determinations of Eligibility:	☐ enclosed	☐ not requested	☒ nothing listed
CA Inventory of Historic Resources (1976):	☐ enclosed	☐ not requested	☒ nothing listed

Caltrans Bridge Survey: Not available at SSJVIC; please see https://dot.ca.gov/programs/environmental-analysis/cultural-studies/california-historical-bridges-tunnels

Ethnographic Information: Not available at SSJVIC

Historical Literature: Not available at SSJVIC

Historical Maps: Not available at SSJVIC; please see http://historicalmaps.arcgis.com/usgs/

Local Inventories: Not available at SSJVIC

GLO and/or Rancho Plat Maps: Not available at SSJVIC; please see http://www.glorecords.blm.gov/search/default.aspx#searchTabIndex=0&searchByTypeIndex=1 and/or http://www.oac.cdlib.org/view?docId=hb8489p15p;developer=local;style=oac4;doc.view=items

Shipwreck Inventory: Not available at SSJVIC; please see https://www.slc.ca.gov/shipwrecks/

Soil Survey Maps: Not available at SSJVIC; please see http://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx

Please forward a copy of any resulting reports from this project to the office as soon as possible. Due to the sensitive nature of archaeological site location data, we ask that you do not include resource location maps and resource location descriptions in your report if the report is for public distribution. If you have any questions regarding the results presented herein, please contact the office at the phone number listed above.

The provision of CHRIS Data via this records search response does not in any way constitute public disclosure of records otherwise exempt from disclosure under the California Public Records Act or any other law, including, but not limited to, records related to archeological site information maintained by or on behalf of, or in the possession of, the State of California, Department of Parks and Recreation, State Historic Preservation Officer, Office of Historic Preservation, or the State Historical Resources Commission.

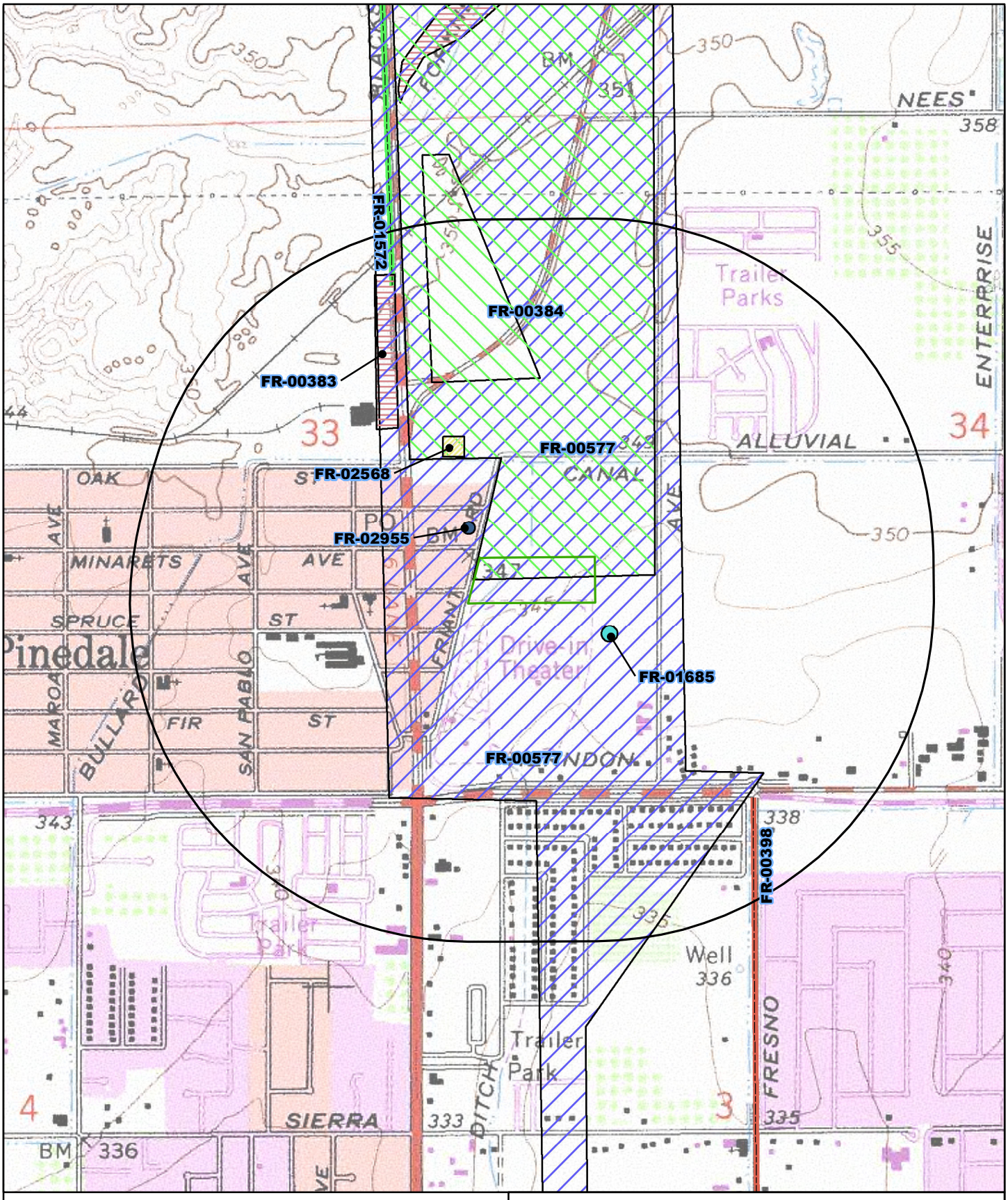
Due to processing delays and other factors, not all of the historical resource reports and resource records that have been submitted to the Office of Historic Preservation are available via this records search. Additional information may be available through the federal, state, and local agencies that produced or paid for historical resource management work in the search area. Additionally, Native American tribes have historical resource information not in the CHRIS Inventory, and you should contact the California Native American Heritage Commission for information on local/regional tribal contacts.

Should you require any additional information for the above referenced project, reference the record search number listed above when making inquiries. Invoices for Information Center services will be sent under separate cover from the California State University, Bakersfield Accounting Office.

Thank you for using the California Historical Resources Information System (CHRIS).

Sincerely,

Celeste M. Thomson
Coordinator



May depict confidential cultural resource locations.
Do not distribute.

0 0.05 0.1 0.2 Miles

0 0.075 0.15 0.3 Kilometers

N

Project Area

Record Search radius

SSJV Information Center Record Search 23-017
Requester: Kerrie Collison, LSA
Project Name: Living Spaces Fresno Project (LSP2201)
USGS 7.5' Quad(s): Fresno North
County: Fresno

Report List

SSJVIC Record Search 23-017

Report No.	Other IDs	Year	Author(s)	Title	Affiliation	Resources
FR-00383		1980	Cursi, Kathleen L. and Varner, Dudley M.	Archaeological Reconnaissance for the Friant Road Realignment, Fresno County, California	California State University, Fresno	
FR-00384		1980	Cursi, Kathleen L. and Varner, Dudley M.	Archaeological Reconnaissance for the Riverpark Properties, Fresno County, California	California State University, Fresno	
FR-00398		1983	Granskog, Jane	Archaeological and Historical Survey for Fresno Street Widening - West Bullard t West Herndon Avenue - An Interim Capacity Project	California State University, Bakersfield	
FR-00577	Caltrans - 06-FRE-41 PM 29.5/33.02 EA 06100-025650	1980	O'Connor, Denise	Archaeological Survey Report for a Proposed Extension of Route 41; 06-Fre-41, 29.5/33.02; 06100-025650	California Department of Transportation	
FR-01572	Caltrans - 06-Fre-41, P.M. 31.3/33.4; 06-Mad-41 P.M. 0.0/10.4; EA 06-263200	1994	Unknown	Supplemental Historic Proerpty Survey Report Corridor Study and Route Adoption in Norhtern Fresno County and Southern Madera County	California Department of Transportation	
FR-01685		2000	Peak, Melinda A.	Cultural Resources Assessment of the Pacific Bell Site, CV-604-02, and Pinedale Site, City of Fresno, Fresno County, California	Peak & Associates, Inc.	
FR-02568	Submitter - Project Name: Blackstone Avenue & Alluvial Avenue; Submitter - Project Number: CN2711	2013	Billat, Lorna	New Tower Submission Packet, FCC Form 620, for Blackstone Avenue & Alluvial Avenue, CN2711	EarthTouch, Inc.	
FR-02955	OHP PRN - FCC_2018_0503_003	2018	Davis, Shane K. and Wills, Carrie D.	Cultural Resource Records Seaarch and Site Visit Results for Cellco Partnership and their Controlled Affiliates doing Business as Verizon Wireless Candidate Abbt & Spruce-E, 75 E. Pinedale Avenue, Fresno, Fresno County, California (EBI Project # 6118001727)	Heliz Environmental Planning	

ATTACHMENT D

SACRED LANDS FILE SEARCH RESULTS

NATIVE AMERICAN HERITAGE COMMISSION

NAHC HEADQUARTERS
1550 Harbor Boulevard
Suite 100
West Sacramento,
California 95691
(916) 373-3710
nahc@nahc.ca.gov
NAHC.ca.gov

February 7, 2023

Kerrie Collison
LSA

Via Email to: Kerrie.Collison@lsa.net

Re: Living Spaces Fresno Project, Fresno County

Dear Ms. Collison:

A record search of the Native American Heritage Commission (NAHC) Sacred Lands File (SLF) was completed for the information you have submitted for the above referenced project. The results were negative. However, the absence of specific site information in the SLF does not indicate the absence of cultural resources in any project area. Other sources of cultural resources should also be contacted for information regarding known and recorded sites.

Attached is a list of Native American tribes who may also have knowledge of cultural resources in the project area. This list should provide a starting place in locating areas of potential adverse impact within the proposed project area. I suggest you contact all of those indicated; if they cannot supply information, they might recommend others with specific knowledge. By contacting all those listed, your organization will be better able to respond to claims of failure to consult with the appropriate tribe. If a response has not been received within two weeks of notification, the Commission requests that you follow-up with a telephone call or email to ensure that the project information has been received.

If you receive notification of change of addresses and phone numbers from tribes, please notify me. With your assistance, we can assure that our lists contain current information.

If you have any questions or need additional information, please contact me at my email address: Cameron.vela@nahc.ca.gov.

Sincerely,

Cameron Vela

Cameron Vela
Cultural Resources Analyst

Attachment

Native American Heritage Commission
Native American Contact List
Fresno County
2/7/2023

Big Sandy Rancheria of Western Mono Indians
Elizabeth Kipp, Chairperson
P.O. Box 337
Auberry, CA, 93602
Phone: (559) 374 - 0066
Fax: (559) 374-0055
lkipp@bsrnation.com
Western Mono

Cold Springs Rancheria of Mono Indians
Carol Bill, Chairperson
P.O. Box 209
Tollhouse, CA, 93667
Phone: (559) 855 - 5043
Fax: (559) 855-4445
coldsprgstribe@netptc.net
Mono

Cold Springs Rancheria of Mono Indians
Jared Aldern,
P. O. Box 209
Tollhouse, CA, 93667
Phone: (559) 855 - 5043
Fax: (559) 855-4445
csrepa@netptc.net
Mono

Dumna Wo-Wah Tribal Government
Robert Ledger, Chairperson
2191 West Pico Ave.
Fresno, CA, 93705
Phone: (559) 540 - 6346
ledgerrobert@ymail.com
Foothill Yokut
Mono

Kings River Choinumni Farm Tribe
Stan Alec,
3515 East Fedora Avenue
Fresno, CA, 93726
Phone: (559) 647 - 3227
Foothill Yokut

North Valley Yokuts Tribe
Katherine Perez, Chairperson
P.O. Box 717
Linden, CA, 95236
Phone: (209) 887 - 3415
canutes@verizon.net
Costanoan
Northern Valley Yokut

North Valley Yokuts Tribe
Timothy Perez,
P.O. Box 717
Linden, CA, 95236
Phone: (209) 662 - 2788
huskanam@gmail.com
Costanoan
Northern Valley Yokut

Picayune Rancheria of Chukchansi Indians
Claudia Gonzales, Chairwoman
P.O. Box 2226
Oakhurst, CA, 93644
Phone: (559) 412 - 5590
cgonzales@chukchansitribe.net
Foothill Yokut

Picayune Rancheria of Chukchansi Indians
Heather Airey, Tribal Historic Preservation Officer
P.O. Box 2226
Oakhurst, CA, 93644
Phone: (559) 795 - 5986
hairey@chukchansi-nsn.gov
Foothill Yokut

Table Mountain Rancheria
Brenda Lavell, Chairperson
P.O. Box 410
Friant, CA, 93626
Phone: (559) 822 - 2587
Fax: (559) 822-2693
rpennell@tmr.org
Yokut

Table Mountain Rancheria
Bob Pennell, Cultural Resource Director
P.O. Box 410
Friant, CA, 93626
Phone: (559) 325 - 0351
Fax: (559) 325-0394
rpennell@tmr.org
Yokut

Traditional Choinumni Tribe
David Alvarez, Chairperson
2415 E. Houston Avenue
Fresno, CA, 93720
Phone: (559) 217 - 0396
Fax: (559) 292-5057
davealvarez@sbcglobal.net
Foothill Yokut

This list is current only as of the date of this document. Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resource Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resources assessment for the proposed Living Spaces Fresno Project, Fresno County.

Tule River Indian Tribe
Kerri Vera, Environmental Department
P. O. Box 589 Yokut
Porterville, CA, 93258
Phone: (559) 783 - 8892
Fax: (559) 783-8932
kerri.vera@tulerivertribe-nsn.gov

Tule River Indian Tribe
Joey Garfield, Tribal Archaeologist
P. O. Box 589 Yokut
Porterville, CA, 93258
Phone: (559) 783 - 8892
Fax: (559) 783-8932
joey.garfield@tulerivertribe-nsn.gov

Tule River Indian Tribe
Neil Peyron, Chairperson
P.O. Box 589 Yokut
Porterville, CA, 93258
Phone: (559) 781 - 4271
Fax: (559) 781-4610
neil.peyron@tulerivertribe-nsn.gov

Wuksache Indian Tribe/Eshom Valley Band
Kenneth Woodrow, Chairperson
1179 Rock Haven Ct. Foothill Yokut
Salinas, CA, 93906 Mono
Phone: (831) 443 - 9702
kwood8934@aol.com

Development Permit Application No. P22-04122

Appendix D

Greenhouse Gas Reduction Plan Project Consistency Checklist

Fresno Greenhouse Gas (GHG) Reduction Plan Update – CEQA Project Consistency Checklist

INTRODUCTION

The City of Fresno updated its 2014 Greenhouse Gas (GHG) Reduction Plan (the Plan) in the year 2021 to conform with existing applicable State climate change policies and regulations. The GHG Plan Update outlines strategies that the City will undertake to achieve its proportional share of GHG emission reductions. The purpose of this GHG Reduction Plan Update Consistency Checklist (Checklist) is to help the City provide a streamlined review process for new development projects that are subject to discretionary review pursuant to the California Environmental Quality Act (CEQA) Guidelines Section 15183.5.

This Checklist has been developed as part of the GHG Plan Update implementation and monitoring process and will support the achievement of individual GHG reduction strategies as well as the City's overall GHG reduction goals. In addition, this Checklist will further the City's sustainability goals and policies that encourage sustainable development and aim to conserve and reduce the consumption of resources, such as energy and water. Projects that meet the requirements of this Checklist will be deemed to be consistent with the Fresno GHG Reduction Plan Update and will be found to have a less than significant contribution to cumulative GHG (i.e., the project's incremental contribution to cumulative GHG effects is not cumulatively considerable), pursuant to CEQA Guidelines Sections 15064(h)(3), 15130(d), and 15183(b). Projects that do not meet the requirements in this Checklist will be deemed to be inconsistent with the Fresno GHG Reduction Plan Update and must prepare a project-specific analysis of GHG emissions, including quantification of existing and projected GHG emissions and incorporation of the measures in this Checklist to the extent feasible. This GHG Checklist can be updated to reflect adoption of new GHG reduction strategies or to comply with any changes and updates in the Plan or local, State or federal regulations. Note that not all the measures in the checklist are applicable to all projects. The projects should comply with applicable measures from the checklist.

1. Project Information	
Contact Information	
Project No./Name:	Living Spaces Fresno Project
Address:	7354 N. Abby Street, Fresno CA 93720
Applicant Name/Co:	Living Spaces
Contact Information:	Robert Holt, Planner III
	Planning and Development Department
	(559) 621-8056
Project Information	
1. What is the Site acreage of the Project?	8.0
2. Identify all Applicable Proposed Land uses:	Furniture Retail Store
a. Residential (Indicate number of single-family units)	
b. Residential (Indicate number of multi-family units)	
c. Commercial (total square footage)	104,867 square feet
d. Industrial (total square footage)	
e. Other (describe)	298 parking stalls, including 30 EV stalls,7 ADA stalls, 36 clean air/vanpool stalls, and 8 bicycle stalls.
3. Is the project or a portion of the project located in a transit priority area? (Y/N)	No
4. Provide a brief description of the project proposed:	Development Permit Application No. P22-04122 was filed on behalf of Living Spaces (Project Applicant). The Project Applicant proposes to construct a 104,867 square foot furniture retail store with 298 parking stalls and associated utility infrastructure on the approximately 8.0-acre project site.

2. Determining Land Use Consistency		
Checklist Item		
As the first step in determining the consistency with the GHG Reduction Plan for discretionary development projects, this section allows the City to determine the project's consistency with the land use assumptions used in the GHG Reduction Plan.		
	Yes	**No**
1. Is the proposed project consistent with the approved General Plan, Specific Plan, and Community Plan planned land use and zoning designations? If the answer is **Yes**, then proceed to the GHG Plan Update Consistency Checklist. If the answer is **No**, then proceed to question 2.	X	
2. If the proposed project is not consistent with the approved planned land use and zoning designation(s), then provide estimated GHG project emissions under both existing and proposed designation(s) for comparison. Compare the maximum buildout of the existing designation with the maximum buildout of the proposed designation. If the estimated project emissions at maximum buildout of the proposed designation(s) **is equivalent to or less than** the estimated project emissions at maximum buildout of the existing designation(s), then in accordance with the City's Significance Determination Thresholds, the project's GHG impact is less than significant. If there is a proposed development project associated with this plan amendment and or rezone then complete the GHG Plan Update Consistency Checklist and incorporate applicable measures, otherwise there is no further step required. If the estimated project emission at maximum buildout of the proposed designation(s) is **greater than** the estimated project emissions at maximum buildout of the existing designation(s), then in accordance with the City's Significance Determination Thresholds, the project's GHG impact is significant. The project must either show consistency with applicable GP objectives and policies (provide applicable GP objectives and policies here) or provide analysis and measures to incorporate into the project to bring the GHG emissions to a level that is less than or equal to the estimated project emission at maximum buildout of the existing designation(s) unless the decision-maker finds that a measure is infeasible in accordance with CEQA Guidelines Section 15091. If there is a proposed development project associated with this plan amendment and or rezone then complete the GHG Plan Update Consistency Checklist and incorporate applicable measures, otherwise there is no further step required.		

3. Greenhouse Gas (GHG) Reduction Plan Update - CEQA Project Consistency Checklist

GHG Reduction Plan Update consistency review involves the evaluation of project consistency with the applicable strategies of the GHG Reduction Plan Update. The GHG reduction strategies identified in the GHG Reduction Plan Update relies upon the General Plan and additional local measures as the basis of the development related strategies to reduce GHG emissions. This checklist is developed based on the key local GHG reduction strategies and actions identified in the GHG Reduction Plan Update that are applicable to proposed development projects. Note that not all strategies listed below will apply to all projects. For example, not all projects will meet mixed-use related policies of the General Plan, because not all projects are required to be mixed use.

Checklist Item (Check the appropriate box and provide an explanation for your answer)	Relevant General Plan Policy	Yes	No	Not Applicable (NA)	Explanation
1: Land Use and Transportation Demand Strategies					
a. Does the project include mixed-use, development? For GHG Reduction Plan consistency, mixed-use development is defined as pedestrian-friendly development that blends two or more residential, commercial, cultural, or institutional, uses, one of which must be residential	Policy UF-1-c, LU-3-b, Objective-UF 12, UF-12-a, UF-12-b, UF-12-d, Policy RC-2-a			X	The proposed project does not include mixed-use development and does not include residential uses.
b. Is the project high density? For GHG Reduction Plan consistency, is the project developed at 12 units per acre or higher?	LU-5-f			X	The proposed project does not include residential uses.
c. Is the project infill development, pursuant to the General Plan definition of location within the City limits as of December 31, 2012?	LU-2-a, Objective-12, UF-12-a, UF-12-b, UF-12-d	X			The project site is within City limits surrounded by commercial and residential uses.
d. Does the project implement pedestrian bicycle, and transit linkages with surrounding land uses and neighborhoods? For GHG Reduction Plan consistency, the project must include all sidewalks, paths, trails, and facilities required by the General Plan and Active Transportation Plan, as implemented through the Fresno Municipal Code and project conditions of approval.	Policy UF-1-c, UF-12-e, Policy RC-2-a, Objective MT-4,5,6, Policy MT-4-c, Policy MT-6-a, Policy POSS-7-h Objective MT 8, Policies MT-8-a, MT-8-b			X	The project would not include roadway improvements. However, the proposed project would improve vehicular access to the project site.
e. If the project includes mixed-use or high density development, is it located within ½ mile of a High Quality Transit Area as defined in the City's CEQA Guidelines for Vehicle Miles Traveled? Or, is the project located within 500 feet of an existing or planned transit stop?	Policy UF-12-a, UF-12-b, LU-3-b, Objective MT 8, Policies MT-8-a, MT-8-b			X	The proposed project does not include mixed-use or high density development.
f. Will the project accommodate a large employer (over 100 employees) and will it implement trip reduction programs such as increasing transit use, carpooling, vanpooling, bicycling, or other measures to reduce vehicle miles traveled pursuant to San Joaquin Valley Air Pollution Control District Rule 9410? See the SJVAPCD website for details: https://www.valleyair.org/rules/currntrules/r9410.pdf	Policy MT-8-b, Objective MT-9, Policy MT-10-c, San Joaquin Valley Air Pollution Control District Rule 9410			X	The project would not have over 100 employees.

Checklist Item (Check the appropriate box and provide an explanation for your answer)	Relevant General Plan Policy	Yes	No	Not Applicable (NA)	Explanation
g. If the project includes modifications to the transportation network, do those improvements meet the requirements of the City of Fresno's Complete Streets Policy, adopted in October 2019? According to the policy, a complete street is a transportation facility that is planned, designed, operated, and maintained to provide safe mobility for all users - including bicyclists, pedestrians, transit vehicles, trucks, and motorists - appropriate to the function and context of the facility while connecting to a larger transportation network. See City of Fresno website for details: https://www.fresno.gov/publicworks/wp-content/uploads/sites/17/2019/10/Complete-Streets-091119.pdf	MT-1-g, MT-1-h			X	The project would not include roadway improvements.
h. Does the project have a less than significant VMT impact, either through satisfying screening criteria or mitigating VMT impacts, pursuant to the City's adopted VMT thresholds? See City of Fresno website for details: https://www.fresno.gov/darm/wp-content/uploads/sites/10/2021/01/CEQA-Guidelines-for-Vehicle-Miles-Traveled-Final-Adopted-Version.pdf	MT-2-b, MT-2-c	X			The proposed project has a less than significant VMT impact.
2: Electric Vehicle Strategies					
a. For new multi-family dwelling units with parking, does the project provide EV charging spaces capable of supporting future EV supply equipment (EV capable) at 10% of the parking spaces per 2019 California Green Building Standards Code (CALGREEN, Title 24, Part 11), Section 4.106.4	Policy RC-8-j			X	The proposed project would not include multi-family residential uses.
b. For new commercial buildings, does project provide EV charging spaces capable of supporting EV capable spaces at 4% to 10% of the parking spaces per 2019 California Green Building Standards Code (CALGREEN, Title 24, Part 11), Section 5.106.5.3	Policy RC-8-j	X			The proposed project would include 30 electric vehicle stalls.
3: Energy Conservation Strategies					
a. Does the project meet or exceed mandatory state building energy codes? If yes, does the project follow any other GreenPoint ratings such as LEED, Energy Star or others? If yes, indicate level of certification-Silver, gold, platinum if applicable?	Policy RC-5-c, Objective RC-8, Policy RC 8-a	X			The project would meet the latest CalGreen standards but would not follow other GreenPoint ratings.
b. For commercial projects, does the project achieve net zero emissions electricity? Mark NA if project will be permitted before 2030. Mark Yes if voluntary. Add source and capacity in explanation.	Additional Recommended GHG Plan Measure, supports Objective RC-8			X	The project would be permitted before 2030.

Checklist Item (Check the appropriate box and provide an explanation for your answer)	Relevant General Plan Policy	Yes	No	Not Applicable (NA)	Explanation
4: Water Conservation Strategies					
a. Does the project meet or exceed the mandatory outdoor water use measures of the 2019 California Green Building Standards Code (CALGREEN, Title 24, Part 11), Section 4.304? If the project exceeds CalGreen Code mandatory measures provide methods in excess of requirements in the explanation. Examples include outdoor water conservation measures such as; drought tolerant landscaping plants, compliant irrigation systems, xeriscape, replacing turf etc. Provide the conservation measure that the project will include in the explanation.	Objective RC-7, Policy RC-7-a, RC-7-h	X			The project would meet the latest CalGreen standards.
b. Does the project meet or exceed the mandatory indoor water use measures of the 2019 California Green Building Standards Code (CALGREEN, Title 24, Part 11), Section 4.303? If the project exceeds CalGreen Code, mandatory measures provide methods in excess of requirements in the explanation. Examples may include water conserving devices and systems such as water leak detection system, hot water pipe insulation, pressure reducing valves, energy efficient appliances such as Energy Star Certified dishwashers, washing machines, dual flush toilets, point of use and/or tankless water heaters.	Objective RC-7, Policy RC-7-a, RC-7-e	X			The project would meet the latest CalGreen standards.
5: Waste Diversion and Recycling Strategies					
a. Does the project implement techniques of solid waste segregation, disposal and reduction, such as recycling, composting, waste to energy technology, and/or waste separation, to reduce the volume of solid wastes that must be sent to landfill facilities?	Policy PU-9-a, RC-11-a	X			The proposed project would be consistent with the CalRecycle Waste Diversion and Recycling Mandate.
b. During construction will the project recycle construction and demolition waste?	Policy RC-11-a	X			The proposed project would recycle construction waste.
c. Does the project provide recycling canisters in public areas where trashcans are also provided?	Policy RC-11-a	X			The proposed project would provide recycling canisters.

Note: The GHG reduction strategies included in this checklist are based on the GHG reduction strategies identified in the Chapter 5 of the GHG Reduction Plan Update.

Development Permit Application No. P22-04122

Appendix E

Vehicle Miles Traveled Analysis Memorandum

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

MEMORANDUM

DATE: March 3, 2023

TO: Lamis Youssef, City of Fresno

FROM: Ambarish Mukherjee, P.E., AICP

SUBJECT: Fresno Living Spaces Vehicle Miles Traveled (VMT) Analysis Memorandum

LSA has prepared this Trip Generation and Vehicle Miles Traveled (VMT) Analysis Memorandum (Memo) for the proposed Fresno Living Spaces (project) in the City of Fresno (City). The project includes development of 104,867 SF of furniture store and will be located at the southeast corner of East Alluvial Avenue and North Abby Street in the City.

The objectives of this Memo are as follows:

- To estimate the trip generation for the proposed project and determine whether a Levels of Service based Traffic Impact Study (TIS) will be required for the project; and
- To determine whether the project will have any VMT impact.

TRIP GENERATION ANALYSIS

Trip generation for the project was developed using rates from the Institute of Transportation Engineers (ITE) *Trip Generation Manual* (11th Edition) for Land Use 890 – "Furniture Store". Table A summarizes the project trip generation and shows that the proposed project is anticipated to generate 27 trips in the a.m. peak hour, 54 trips in the p.m. peak hour, and 661 gross daily trips.

Retail projects typically draw significant amount trips from the traffic passing the site on an adjacent street. These trips are not "new" trips made for the sole purpose of visiting the site, but are trips made as an intermediate stop en-route to final destination. Trips from traffic passing the site on an adjacent street are referred to as "pass-by" trips. Pass-by trip percentage for the project land use was obtained from the ITE Trip Generation Manual (11th Edition). The pass-by trips were subtracted from the gross trip generation trips to obtain the net primary trips for the project. As shown in Table A, the project is anticipated to generate 27 net trips in the a.m. peak hour, 25 net trips in the p.m. peak hour, and 311 net daily trips.

As recommended in the City of Fresno *Traffic Impact Study Report Guidelines*, dated February 2009, a detailed LOS based Traffic Impact Study (TIS) shall not be required for a project if it generates less than 100 peak hour trips. Since the anticipated number of peak hour trips generated by the proposed project is lower than the 100-trip threshold established by the City's Guidelines, a TIS may not be required for this project.

VEHICLE MILES TRAVELED ANALYSIS

On December 28, 2018, the California Office of Administrative Law cleared the revised California Environmental Quality Act (CEQA) guidelines for use. Among the changes to the guidelines was removal of vehicle delay and level of service from consideration under CEQA. With the adopted guidelines, transportation impacts are to be evaluated based on a project's effect on vehicle miles traveled (VMT).

As mentioned above, the project is located within the jurisdiction of City of Fresno. The City has adopted City's CEQA Guidelines for Vehicle Miles Traveled Thresholds (Guidelines), dated June 2020. Therefore, the City's guidelines were used to determine the project's VMT impact. The City's guidelines include multiple screening criteria for land use projects. Also, an excel based VMT calculator tool is available from Fresno Council of Governments (Fresno COG) that can be used to conduct VMT analysis for small land use projects that are consistent with City's General Plan (GP). However, given the project type (retail) and size, the project does not meet screening criteria identified in the guidelines and the excel based VMT calculator tool is not applicable for evaluation of retail projects. Therefore, Fresno COG's Activity-Based Model (ABM) was used to evaluate the project VMT impact.

METHODOLOGY

The VMT Guidelines suggest use of total VMT as the metric to evaluate retail land uses The project consists of only retail land use and hence total VMT was used as the VMT metric. Therefore, if there is a net increase in total regional VMT for the "with project" scenario compared to the "no project" scenario, the project constitutes a significant VMT impact. Total VMT for the "no project" scenario was obtained using a separate no project model run.

Project Traffic Analysis Zone Update

The first step in the preparation of this analysis was to update the traffic analysis zones (TAZs) in the model that includes the project area. Fresno COG ABM includes ability to add or split zones. In order to isolate the project VMT, a new zone was created in the model. The project description included the number of employees for the project (85 employees) which was included in the newly created zone for modeling purposes. No project specific network modifications were required for the model run. Model run was conducted for the existing/base scenario with updated model inputs. The outputs from this updated model run were used to calculate the total regional VMT for the "with project" scenario.

Project Impact Determination

Based on the City's VMT Guidelines, the project will have a significant VMT impact if there is a net increase in total regional VMT for the "with project" compared to the "no project" scenario. As shown in Table B, the total regional VMT for the "with project" scenario is less than the total regional VMT for the "no project" scenario. Therefore, as per the City's VMT Guidelines, the project will not have a significant VMT impact.

LSA

Table A - Project Trip Generation

Land Use	Units	A.M. Peak Hour In	A.M. Peak Hour Out	A.M. Peak Hour Total	P.M. Peak Hour In	P.M. Peak Hour Out	P.M. Peak Hour Total	Daily
Furniture Store	104.867 TSF							
Trips/Unit[1]		0.18	0.08	0.26	0.24	0.28	0.52	6.30
Trip Generation		19	8	27	25	29	54	661
Pass-by Trips[2]		0	0	0	(13)	(15)	(29)	(350)
Net New Trips		19	8	27	12	14	25	311

Notes:

TSF = Thousand Square Feet

[1] Rates from Institute of Transportation Engineers (ITE) *Trip Generation Manual*, (11th Edition) Land Use 890 - "Furniture Store" , Setting/Location - 'General Urban/Suburban'.

[2] Pass-by rates from the ITE *Trip Generation Manual* (11th Edition) for Land Use 890 - 'Furniture Store.' A pass-by rate of 53% was used for the p.m. peak hour. Since daily pass-by rates are not available for this land use in the ITE*Trip Generation Manual*, the p.m. pass-by rate was used as the daily pass-by rate.

Table B: Total Regional VMT – With Project and No Project Scenarios

	With Project	No Project	Difference
Total Roadway VMT (Within Entire Fresno County)	23,240,962	23,241,062	(100)

Source: Fresno COG Activity Based Model (ABM)

**: VMT for the "no project" scenario was obtained from LSA "no project" model run*