Exhibit L-6

City of Fresno

Copper River Ranch Project

Findings of Fact Regarding the Environmental Effects from the Subsequent Environmental Impact Report

State Clearinghouse # 2000021003

November 2021

FINDINGS OF FACT

1.0 Introduction

The following Findings of Fact are based in part on the information contained in the Copper River Draft and Final Subsequent Environmental Impact Report (State Clearinghouse #2000021003) that was prepared by the City of Fresno acting as lead agency pursuant to the California Environmental Quality Act (CEQA). Hereafter, unless specifically identified, the Notice of Preparation (NOP), Notice of Availability & Completion (NOA/NOC), Draft Subsequent Environmental Impact Report (Draft SEIR), Appendices, Technical Studies, Final SEIR containing Responses to Comments and textual revisions to the Draft SEIR (in the Final SEIR), and the Mitigation Monitoring and Reporting Program (MMRP) will be referred to collectively herein as the "SEIR." These Findings are based on the entire record before the City Council, including the SEIR. The SEIR is hereby incorporated by reference and is available for review at the City of Fresno, 2600 Fresno Street, Fresno, CA.

2.0 Findings Regarding the Potential Environmental Effects of the Project

The City of Fresno Planning and Development Department issued a Notice of Preparation (NOP) of the Draft SEIR for public review from July 31, 2020 to August 30, 2020. The Draft SEIR was released for public review from August 25, 2021 through October 11, 2021. The Draft SEIR provided a comprehensive analysis of all environmental issues, identified in Appendix G of the CEQA Guidelines. Following public review of the Draft SEIR, a Final SEIR was prepared. With respect to all impacts identified as "less than significant" or as having "no impact" in the Final SEIR, the lead agency finds that those impacts have been described accurately and are less than significant or have no impact as so described in the Final SEIR. Despite concluding that certain impacts would be less than significant or would have no impact, the Final SEIR nonetheless incorporated mitigation measures to comply with the goals, objectives, and policies of the City of Fresno General Plan, Municipal Code and other adopted regulations. The lead agency finds that these effects are less than significant or have no impact before and after implementation of these mitigation measures.

In addition, some impacts in the Final SEIR were found to be "significant" but were able to be mitigated to less-than-significant levels and others were found to be "significant and unavoidable." The lead agency finds that those impacts have been described accurately and are less than significant with the implementation of mitigation or are significant and unavoidable.

Written findings and a brief explanation of the rationales for each finding in accordance with Section 21081(a) of the Public Resources Code and Section 15091 of the CEQA Guidelines have been included for each significant impact as identified in the Final SEIR. The occurrences of significant environmental effects that cannot be avoided after all reasonable and feasible mitigation have been adopted for Aesthetics, Air Quality, Noise and Transportation are included in the Statement of Overriding Considerations. The Statement of Overriding Considerations, in compliance with State CEQA Guidelines Section 15093, includes a discussion of the benefits of the project that provides a basis for the recommended approval of the project despite the adverse environmental effects that could and/or will occur. Additionally, a Mitigation Measure Monitoring Program has been prepared for the Project.

A. Aesthetics

i. Environmental Effects of the Project Found to Have No Impact on the Environmental or Have a Less Than Significant Impact on the Environment.

- **Impact 3.1-1:** Have a substantial adverse effect on a scenic vista.
- **Impact 3.1-2:** Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.

ii. Environmental Effects of the Project that are Potentially Significant, but that can be Mitigated to a Less Than Significant Level.

- **Impact 3.1-3:** Substantially degrade the existing visual character or quality of public views of the site and its surroundings. (Public views are those that are experienced from publicly accessible vantage point). The Project is located in an area planned for urban uses and would not conflict with applicable zoning and regulations governing scenic quality.

Finding: Changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant effects on the environment. (14 CCR § 15091(a)(1).)

Rationale for the Finding: The Project design is subject to the City's Design Guidelines adopted for the City's General Plan 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 will be submitted by the Project developer to the City of Fresno Development and Resource Management Department. The plans shall be required prior to issuance of any building permits. Landscaping

easements will run along the frontage of the development and additional landscaping design will accompany the park and trail areas. The improvements such as those proposed by the Project are typical of large City urban areas and are generally expected from residents of the City. These improvements 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 and development patterns in the area. The Project itself is not visually imposing against the scale of the existing development and nature of the surrounding area. Implementation of the mitigation measure AES-1 will reduce impacts to a less than significant level.

- **Impact 3.1-4:** Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

  Finding: Changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant effects on the environment. (14 CCR § 15091(a)(1).)

  Rationale for the Finding: The existing Copper River Ranch Development and surrounding areas currently produce light and glare from streetlights, residential lights, commercial security lighting and vehicle lights. Additional night lighting sources associated with the proposed Project, especially any unshielded light, could result in spillover light that could impact surrounding adjacent residential uses. This would create new sources of light that could potentially have a significant impact on nighttime light levels in the area. During the entitlement process, staff will ensure that lights are located in areas that will minimize light sources to the neighboring properties. Further, the applied mitigation measures require lighting systems to be shielded to direct light to ground surfaces and orient light away from adjacent properties and requires use of non-reflective building materials to reduce glare impacts.

  In addition, a condition of approval will require that lighting, where provided for public streets, shall be hooded and so arranged and controlled so as not to cause a nuisance either to traffic or to the living environment. The amount of light shall be provided according to the standards of the Department of Public Works. Implementation of mitigation measures AES-2, AES-3, AES-4, AES-5 and AES-6 will reduce the impact to a less than significant level.

iii. Environmental Effects of the Project that Cannot be Mitigated to a Less Than Significant Level.

- None

iv. Cumulative Environmental Effects of the Project that Will Have a Less Than Significant Impact on the Environment.

- None

v. Cumulative Environmental Effects of the Project that Will Have a Significant Impact on the Environment.

- **Impact 3.1.3**: Mitigation measures associated with this topic are included to ensure that potential impacts to aesthetics remains less than significant at a project level. However, when combined with other existing and future development in the area, the impacts are determined to be significant at the cumulative level. For this reason, the proposed Project would have a significant and unavoidable cumulatively considerable contribution to degrading the existing visual character or quality of public views of the site and its surroundings or conflicting with applicable zoning and regulations governing scenic quality.

  Significant Effect: Full buildout of the proposed Project would cause significant changes to the existing visual character or quality of public views of the site and its surrounding areas by developing urban uses (residential and commercial) in areas that are currently vacant/undeveloped.

  Description of Specific Impacts: The proposed Project is located in an area that has been substantially urbanized. The vacant lands associated with the proposed Project have generally been disturbed through grading and disking and consist primarily of bare ground with little vegetation. Implementation of the proposed Project will alter the visual character of the Project site from vacant/disturbed land to urban development. When combined with other existing and future development in the area, this contributes to a significant cumulative aesthetic impact.

  Finding: The landscape in north-central Fresno County has been changing over the years from one of predominately rural open space and agricultural grazing land to urban uses. The cities of Fresno and Clovis have been rapidly

growing to the north and northwest, contributing to the landscape change. Several land development proposals envisioned by the City of Fresno, City of Clovis and Fresno County general plans and individual project proposals have received their entitlements, or are seeking them. Although the urban environment that is ultimately built could be aesthetically pleasing to many, these cumulative changes will significantly degrade the existing visual character and quality of the area. Based on the standards of significance, the proposed Project individually would have a less than significant aesthetic impact with implementation of mitigation measures AES-1 through AES-6 at the project level. However, ultimate impacts of the proposed Project in combination with other projects in the area are significant, and the Project's incremental contribution to this impact is itself cumulatively considerable and thus significant. This impact cannot be mitigated to a less than cumulatively considerable level and is unavoidable.

There are no additional feasible mitigation measures that would reduce the identified significant impact to a level below significant. This impact would remain significant and unavoidable even with mitigation measures incorporated to the maximum extent feasible. As further explained in the Statement of Overriding Considerations, the City finds that there are specific overriding economic, legal, social, technological, and other benefits of the project that outweigh the significant and unavoidable impacts and make infeasible the mitigation measures or project alternatives identified in the Final SEIR. (14 CCR § 15091(a)(3).)

Rationale for the Finding: CEQA requires that all feasible and reasonable mitigation be applied to reduce the Project's cumulative impacts to the environment caused by the introduction of aesthetic / visual resource impacts to the Project area. All feasible mitigation measures to reduce the impact have been implemented and there are no additional feasible or reasonable mitigation measures that can reduce this impact to a level that is less than significant. Cumulative impacts will remain significant and unavoidable.

B. Agriculture and Forestry Resources

i. Environmental Effects of the Project Found to Have No Impact on the Environmental or Have a Less Than Significant Impact on the Environment.

- **Impact 3.2-1**: 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.
- **Impact 3.2-2**: Conflict with existing zoning for agricultural use, or a Williamson Act contract.
- **Impact 3.2-3**: 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)), or result in the loss of forest land or convert forest land to non-forest use.

ii. Environmental Effects of the Project that are Potentially Significant, but that can be Mitigated to a Less Than Significant Level.

- **Impact 3.2-4**: 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.

Finding: Changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant effects on the environment. (14 CCR § 15091(a)(1).)

Rationale for the Finding: The proposed Project is not located on Farmland as designated by the FMMP or the City and there is no forest land in the Project vicinity. However, there are agricultural lands located immediately east of Project boundary on the east side of Willow Avenue. To reduce potential conflicts between urban and agricultural uses, mitigation measure AG-1 is being imposed that will include a "Right-to-Farm Covenant" and notification of potential residents about exposure to agricultural activities. Implementation of mitigation measure AG-1 will reduce the impacts to a less than significant level.

iii. Environmental Effects of the Project that Cannot be Mitigated to a Less Than Significant Level.

- None

iv. Cumulative Environmental Effects of the Project that Will Have a Less Than Significant Impact on the Environment.

- None

v. Cumulative Environmental Effects of the Project that Will Have a Significant Impact on the Environment.

- None

C. Air Quality

i. Environmental Effects of the Project Found to Have No Impact on the Environmental or Have a Less Than Significant Impact on the Environment.

- **Impact 3.3-3**: Expose sensitive receptors to substantial pollutant concentrations.
- **Impact 3.3-4**: Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

ii. Environmental Effects of the Project that are Potentially Significant, but that can be Mitigated to a Less Than Significant Level.

- None

iii. Environmental Effects of the Project that Cannot be Mitigated to a Less Than Significant Level.

- **Impact 3.3-1:** The Project would conflict with or obstruct implementation of an applicable air quality plan.

  Significant Effect: The Project's emissions are significant for ROG, NOx, CO, and PM10 and thus the Project would be considered inconsistent with the San Joaquin Valley Air Pollution Control District's (SJVAPCD) applicable Air Quality Plan (AQP) for this criterion.

  Description of Specific Impacts: Implementation of the proposed Project would result in construction and operational air emission impacts from development of the residential and commercial components of the Project. The majority of emissions are derived from carbon-based vehicle trips associated with the development. A smaller amount would be generated from construction activities.

  With full buildout, the Project would generate emissions for ROG, NOx, CO and PM10 that exceed established thresholds. Implementation of the proposed Project would significantly impact the nonattainment area by exceeding the

SJVAPCD for air emission standards and thus would obstruct implementation of the AQP.

Finding: The Project would conflict with or obstruct implementation of an applicable AQP. The Project's emissions are significant for ROG, NOx, CO, and PM_{10} and would be considered inconsistent with the applicable AQP for this criterion. The growth accommodated by Copper River Ranch is included in the City's General Plan and therefore it is consistent with the land use assumptions used to prepare the AQP. A substantial portion of the undeveloped area in Copper River Ranch is fully entitled by the City so no additional mitigation can be imposed on those individual projects. Copper River Ranch includes numerous design features to reduce motor vehicle trips and increase walking, bicycling, and transit use. In addition, all projects are required to comply with Rule 9510, which is intended to mitigate the cumulative impacts of new development in the San Joaquin Valley to the extent feasible. However, after compliance with Rule 9510, emissions will still exceed the SJVAPCD quantitative thresholds of significance. Mitigation measure AIR-1 (2.3.1-a, 2.3.1-b, 2.3.2-a, and 2.3.2-b) will reduce impacts; however, impacts are still considered significant and unavoidable.

There are no feasible mitigation measures that would reduce the identified significant impact to a level below significant. This impact would remain significant and unavoidable even with mitigation measures incorporated to the maximum extent feasible. As further explained in the Statement of Overriding Considerations, the City finds that there are specific overriding economic, legal, social, technological, and other benefits of the project that outweigh the significant and unavoidable impacts and make infeasible the mitigation measures or project alternatives identified in the Final SEIR. (14 CCR § 15091(a)(3).)

Rationale for the Finding: CEQA requires that all feasible and reasonable mitigation be applied to reduce the Project's cumulative impacts to the environment caused by obstruction of the applicable AQP. All feasible mitigation measures to reduce the impact have been implemented and there are no additional feasible or reasonable mitigation measures that can reduce this impact to a level that is less than significant. Impacts will remain significant and unavoidable.

- **Impact 3.3-2:** The Project would result in a cumulatively considerable net increase of a criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard.

  Significant Effect: The Project's emissions are significant for ROG, NOx, CO, and PM10 and will result in a cumulatively considerable net increase in criteria pollutants in an area of nonattainment.

  Description of Specific Impacts: Implementation of the proposed Project would result in construction and operational air emission impacts from development of the residential and commercial components of the Project. The majority of emissions are derived from carbon-based vehicle trips associated with the development. A smaller amount would be generated from construction activities.

  With full buildout, the Project would generate emissions for ROG, NOx, CO and PM10 that exceed established thresholds. Implementation of the proposed Project would significantly impact the nonattainment area by exceeding the SJVAPCD for air emission standards.

  Finding: The Project's emissions are significant for ROG, NOx, CO, and PM10 and will result in a cumulatively considerable net increase in criteria pollutants in an area of nonattainment. The growth accommodated by Copper River Ranch is included in the City's General Plan and therefore it is consistent with the land use assumptions used to prepare the AQP. A substantial portion of the undeveloped area in Copper River Ranch is fully entitled by the City so no additional mitigation can be imposed on those individual projects. Copper River Ranch includes numerous design features to reduce motor vehicle trips and increase walking, bicycling, and transit use. In addition, all projects are required to comply with Rule 9510, which is intended to mitigate the cumulative impacts of new development in the San Joaquin Valley to the extent feasible. However, after compliance with Rule 9510, emissions will still exceed the SJVAPCD quantitative thresholds of significance. Mitigation measure AIR-1 (2.3.1-a, 2.3.1-b, 2.3.2-a, and 2.3.2-b) will reduce impacts; however, impacts are still considered significant and unavoidable.

There are no additional feasible mitigation measures that would reduce the identified significant impact to a level below significant. This impact would remain significant and unavoidable even with mitigation measures incorporated to the maximum extent feasible. As further explained in the Statement of Overriding Considerations, the City finds that there are specific overriding economic, legal, social, technological, and other benefits of the project that outweigh the significant and unavoidable impacts and make infeasible the mitigation measures or project alternatives identified in the Final SEIR. (14 CCR § 15091(a)(3).)

Rationale for the Finding: CEQA requires that all feasible and reasonable mitigation be applied to reduce the Project's cumulative impacts to the environment caused by the introduction of significant air emissions to the Project area. All feasible mitigation measures to reduce the impact have been implemented and there are no additional feasible or reasonable mitigation measures that can reduce this impact to a level that is less than significant. Impacts will remain significant and unavoidable.

iv. Cumulative Environmental Effects of the Project that Will Have a Less Than Significant Impact on the Environment.

- None

v. Cumulative Environmental Effects of the Project that Will Have a Significant Impact on the Environment.

- **Impacts 3.3-1 and 3.3-2**: The Project would result in a cumulatively considerable net increase of a criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard, and thus would also conflict with or obstruct implementation of an applicable air quality plan. Although mitigation measure AIR – 1 (2.3.1-a, 2.3.1-b, 2.3.2-a, and 2.3.2-b) is expected to reduce emissions, it would not be to a less than significant level. For this reason, the proposed Project would have a significant and unavoidable cumulatively considerable contribution to increasing criteria pollutants and conflicting with an applicable air quality plan.

  Significant Effect: The Project's emissions are significant for ROG, NOx, CO, and PM10 and will result in a cumulatively considerable net increase in criteria

pollutants in an area of nonattainment. The Project will also conflict with an applicable AQP.

Description of Specific Impacts: Implementation of the proposed Project would result in construction and operational air emission impacts from development of the residential and commercial components of the Project. The majority of emissions are derived from carbon-based vehicle trips associated with the development. A smaller amount would be generated from construction activities.

With full buildout, the Project would generate emissions for ROG, NOx, CO and PM10 that exceed established thresholds. Implementation of the proposed Project would significantly impact the nonattainment area by exceeding the SJVAPCD for air emission standards and by obstructing the implementation of an applicable AQP.

Finding: The Project's emissions are significant for ROG, NOx, CO, and PM_{10} and would be considered inconsistent with the applicable AQP for this criterion. The growth accommodated by Copper River Ranch is included in the City's General Plan and therefore it is consistent with the land use assumptions used to prepare the AQP. A substantial portion of the undeveloped area in Copper River Ranch is fully entitled by the City so no additional mitigation can be imposed on those individual projects. Copper River Ranch includes numerous design features to reduce motor vehicle trips and increase walking, bicycling, and transit use. In addition, all projects are required to comply with Rule 9510, which is intended to mitigate the cumulative impacts of new development in the San Joaquin Valley to the extent feasible. However, after compliance with Rule 9510, emissions will still exceed the SJVAPCD quantitative thresholds of significance. Mitigation measure AIR-1 (2.3.1-a, 2.3.1-b, 2.3.2-a, and 2.3.2-b) will reduce impacts; however, impacts are still considered significant and unavoidable.

There are no feasible mitigation measures that would reduce the identified significant impact to a level below significant. This impact would remain significant and unavoidable even with mitigation measures incorporated to the maximum extent feasible. As further explained in the Statement of Overriding Considerations, the City finds that there are specific overriding economic, legal, social, technological, and other benefits of the project that outweigh the significant and unavoidable impacts and make infeasible the

mitigation measures or project alternatives identified in the Final SEIR. (14 CCR § 15091(a)(3).)

Rationale for the Finding: CEQA requires that all feasible and reasonable mitigation be applied to reduce the Project's cumulative impacts to the environment caused by the introduction of significant air emissions to the Project area. All feasible mitigation measures to reduce the impact have been implemented and there are no additional feasible or reasonable mitigation measures that can reduce this impact to a level that is less than significant. Cumulative impacts will remain significant and unavoidable.

D. Biological Resources

i. Environmental Effects of the Project Found to Have No Impact on the Environmental or Have a Less Than Significant Impact on the Environment.

- **Impact 3.4-2**: Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.
- **Impact 3.4-3**: 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.
- **Impact 3.4-5**: Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.
- **Impact 3.4-6**: Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

ii. Environmental Effects of the Project that are Potentially Significant, but that can be Mitigated to a Less Than Significant Level.

- **Impact 3.4-1**: 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.

Finding: Changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant effects on the environment. (14 CCR § 15091(a)(1).)

Rationale for the Finding: The Project could adversely affect, either directly or through habitat modifications, two special-status animals that occur or may occur on or near the Project site. Swainson's hawk (ST) has a low potential to occur on or near the Project site. The burrowing owl (SSSC) was not detected but also has a low potential to occur on the Project site. Construction activities such as excavating, trenching, or using other heavy equipment that disturbs or harms a special-status species or substantially modifies its habitat could constitute a significant impact. Therefore, protection measures outlined in Mitigation Measures BIO-1 and BIO-2 will be implemented to reduce the potential impact to a less than significant level.

- **Impact 3.4-4:** 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.

Finding: Changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant effects on the environment. (14 CCR § 15091(a)(1).)

Rationale for the Finding: The Project could impede the use of nursery sites for native birds protected under the California Fish and Game Code and Migratory Bird Treaty Act. Migratory birds are expected to nest on and near the Project site. Construction disturbance during the breeding season could result in the incidental loss of fertile eggs or nestlings or otherwise lead to nest abandonment. Disturbance that causes nest abandonment or loss of reproductive effort is considered take by the CDFW. Loss of fertile eggs or nestlings, or any activities resulting in nest abandonment, could constitute a significant impact if the species is particularly rare in the region. Therefore, protection measures outlined in Mitigation Measure BIO-3 will be implemented to reduce the potential impact to a less than significant level.

iii. Environmental Effects of the Project that Cannot be Mitigated to a Less Than Significant Level.

- None

iv. Cumulative Environmental Effects of the Project that Will Have a Less Than Significant Impact on the Environment.

- None

v. Cumulative Environmental Effects of the Project that Will Have a Significant Impact on the Environment.

- None

E. Cultural Resources

i. Environmental Effects of the Project Found to Have No Impact on the Environmental or Have a Less Than Significant Impact on the Environment.

- None

ii. Environmental Effects of the Project that are Potentially Significant, but that can be Mitigated to a Less Than Significant Level.

- **Impact 3.5-1**: Cause a substantial adverse change in the significance of a historical or archaeological resource pursuant to §15064.5.

  Finding: Changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant effects on the environment. (14 CCR § 15091(a)(1).)

  Rationale for the Finding: According to the records search and site survey, there are no recorded historical resources within the Project area. Additionally, the study area was evaluated by Caltrans and Far Western and Associates in 2019 as being low sensitivity and lowest sensitivity for both surface and buried cultural/historical deposits. Project construction and operation would occur on existing disturbed lands; however, further disturbance could potentially discover buried sensitive historical, archaeological or cultural resources. Implementation of mitigation measure CUL-1 will reduce the impact to a less than significant level.

- **Impact 3.5-2**: Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5.

  Finding: Changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant effects on the environment. (14 CCR § 15091(a)(1).)

  Rationale for the Finding: According to the records search and site survey, there are no recorded historical resources within the Project area. Additionally, the study area was evaluated by Caltrans and Far Western and Associates in 2019 as being low sensitivity and lowest sensitivity for both surface and buried cultural/historical deposits. Project construction and operation would occur on existing disturbed lands; however, further disturbance could potentially discover buried sensitive historical, archaeological or cultural resources. Implementation of mitigation measure CUL-1 will reduce the impact to a less than significant level.

- **Impact 3.5-3:** *D*isturb any human remains, including those interred outside of formal cemeteries.

  Finding: Changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant effects on the environment. (14 CCR § 15091(a)(1).)

  Rationale for the Finding: California Health and Safety Code Section 7050.5, CEQA Section 15064.5, and Public Resources Code Section 5097.98 mandate the process to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery. Specifically, California Health and Safety Code Section 7050.5 requires that in the event that human remains are discovered within a project site, disturbance of the site shall remain halted until the coroner has conducted an investigation into the circumstances, manner and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation, or to his or her authorized representative, in the manner provided in Section 5097.98 of the Public Resources Code. If the coroner determines that the remains are not subject to his or her authority and if the coroner recognizes or has reason to believe the human remains to be those of a Native American, he or she shall contact, by

telephone within 24 hours, the Native American Heritage Commission. Although soil-disturbing activities associated with development in accordance with the proposed project could result in the discovery of human remains, compliance with existing law would ensure that impacts to human remains would not be significant.

Project development would occur on existing disturbed lands; however, further disturbance could potentially uncover human remains. This would be a potentially significant impact. Implementation of mitigation measure CUL-2 will reduce the impact to a less than significant level.

iii. Environmental Effects of the Project that Cannot be Mitigated to a Less Than Significant Level.

- None

iv. Cumulative Environmental Effects of the Project that Will Have a Less Than Significant Impact on the Environment.

- None

v. Cumulative Environmental Effects of the Project that Will Have a Significant Impact on the Environment.

- None

F. Energy

i. Environmental Effects of the Project Found to Have No Impact on the Environmental or Have a Less Than Significant Impact on the Environment.

- **Impact 3.6-1**: Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.
- **Impact 3.6-2**: Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

ii. Environmental Effects of the Project that are Potentially Significant, but that can be Mitigated to a Less Than Significant Level.

- None

iii. Environmental Effects of the Project that Cannot be Mitigated to a Less Than Significant Level.

- None

iv. Cumulative Environmental Effects of the Project that Will Have a Less Than Significant Impact on the Environment.

- None

v. Cumulative Environmental Effects of the Project that Will Have a Significant Impact on the Environment.

- None

G. Geology & Soils

i. Environmental Effects of the Project Found to Have No Impact on the Environmental or Have a Less Than Significant Impact on the Environment.

- **Impact 3.7-1**: Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

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

  ii) Strong seismic ground shaking?

  iii) Seismic-related ground failure, including liquefaction?

  iv) Landslides.

- **Impact 3.7-2**: Result in substantial soil erosion or the loss of topsoil.
- **Impact 3.7-3**: 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.

ii. Environmental Effects of the Project that are Potentially Significant, but that can be Mitigated to a Less Than Significant Level.

- **Impact 3.7-4**: Directly or indirectly destroy a unique paleontological resource or site or unique geological feature.

Finding: Changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant effects on the environment. (14 CCR § 15091(a)(1).)

Rationale for the Finding: Paleontological resources are valued for the information they yield about the history of the earth and its past ecological settings. A review of the cultural and historical resources was provided in the Draft SEIR Sections 3.5 and 3.17, Cultural Resources and Tribal Resources, respectively. There are currently no unique geologic features located on the Project site. While the discovery of underground paleontological resources in the Project site is considered unlikely, Mitigation Measure CUL-1 would be implemented in the case of any inadvertent discoveries. With adherence to these regulatory requirements and measures, impacts would be less than significant.

iii. Environmental Effects of the Project that Cannot be Mitigated to a Less Than Significant Level.

- None

iv. Cumulative Environmental Effects of the Project that Will Have a Less Than Significant Impact on the Environment.

- None

v. Cumulative Environmental Effects of the Project that Will Have a Significant Impact on the Environment.

- None

H. Greenhouse Gases

i. Environmental Effects of the Project Found to Have No Impact on the Environmental or Have a Less Than Significant Impact on the Environment.

- **Impact 3.8-1**: Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.
- **Impact 3.8-2**: Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gasses.

ii. Environmental Effects of the Project that are Potentially Significant, but that can be Mitigated to a Less Than Significant Level.

- None

iii. Environmental Effects of the Project that Cannot be Mitigated to a Less Than Significant Level.

- None

iv. Cumulative Environmental Effects of the Project that Will Have a Less Than Significant Impact on the Environment.

- None

v. Cumulative Environmental Effects of the Project that Will Have a Significant Impact on the Environment.

- None

I. Hazards & Hazardous Materials

i. Environmental Effects of the Project Found to Have No Impact on the Environmental or Have a Less Than Significant Impact on the Environment.

- **Impact 3.9-1**: Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, or through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.
- **Impact 3.9-2**: 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.
- **Impact 3.9-3**: Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.
- **Impact 3.9-4**: 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.
- **Impact 3.9-5**: 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, the project result in a safety hazard or excessive noise for people residing or working in the project area.
- **Impact 3.9-6**: Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

- **Impact 3.9-7:** Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.

ii. Environmental Effects of the Project that are Potentially Significant, but that can be Mitigated to a Less Than Significant Level.

- None

iii. Environmental Effects of the Project that Cannot be Mitigated to a Less Than Significant Level.

- None

iv. Cumulative Environmental Effects of the Project that Will Have a Less Than Significant Impact on the Environment.

- None

v. Cumulative Environmental Effects of the Project that Will Have a Significant Impact on the Environment.

- None

J. Hydrology & Water Quality

i. Environmental Effects of the Project Found to Have No Impact on the Environmental or Have a Less Than Significant Impact on the Environment.

- **Impact 3.10-3**: 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 offsite;

  ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;

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

  iv. impede or redirect flood flows.

- **Impact 3.10-4**: In flood hazard, tsunami or seiche zones, risk release of pollutants due to project inundation.

- **Impact 3.10-5**: Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

ii. Environmental Effects of the Project that are Potentially Significant, but that can be Mitigated to a Less Than Significant Level.

- **Impact 3.10-1**: Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality.

  Finding: Changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant effects on the environment. (14 CCR § 15091(a)(1).)

  Rationale for the Finding: In accordance with the NPDES Stormwater Program, the Project will be required to comply with existing regulatory requirements to prepare a SWPPP designed to control erosion and the loss of topsoil to the extent practicable using BMPs that the RWQCB has deemed effective in controlling erosion, sedimentation, runoff during construction activities. The specific controls are subject to the review and approval by the RWQCB and are an existing regulatory requirement. Implementation of Mitigation Measure HYD - 1 would ensure that the proposed Project would have a less than significant impact relative to this topic. In addition, the Project will generate typical wastewater (sewer) associated with residential developments and will connect to the City's sewer system. The Project will not result in a violation of any water quality standards or waste discharge requirements. Therefore, with mitigation, impacts related to this specific resource result in a less than significant impact.

- **Impact 3.10-2**: Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.

  Finding: Changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant effects on the environment. (14 CCR § 15091(a)(1).)

  Rationale for the Finding: Water supplies constructed for the original 706 acres (as analyzed in the 2003 FEIR) are sufficient to meet the currently

proposed Project build-out water demands for the 706 acre area. For the new 109 acre area, the Developer shall pay the Water Capacity Fee, as specified in the City's Master Fee Schedule, for all new connections to the City's water system (See Mitigation Measure HYD – 2B). As such, there is a less than significant impact to this impact area. Mitigation Measures HYD – 2A and HYD – 2B will help ensure that impacts remain less than significant.

iii. Environmental Effects of the Project that Cannot be Mitigated to a Less Than Significant Level.

- None

iv. Cumulative Environmental Effects of the Project that Will Have a Less Than Significant Impact on the Environment.

- None

v. Cumulative Environmental Effects of the Project that Will Have a Significant Impact on the Environment.

- None

K. Land Use and Planning

i. Environmental Effects of the Project Found to Have No Impact on the Environmental or Have a Less Than Significant Impact on the Environment.

- **Impact 3.11-1**: Physically divide an established community.

ii. Environmental Effects of the Project that are Potentially Significant, but that can be Mitigated to a Less Than Significant Level.

- **Impact 3.11-2**: 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.

Finding: Changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant effects on the environment. (14 CCR § 15091(a)(1).)

Rationale for the Finding: The proposed Project is consistent with the goals of the City's General Plan and will not significantly conflict with

applicable land use plans, policies or regulations of the City of Fresno. Furthermore, the proposed Project, once approved, would result in the following findings: (1) The Project is consistent with the goals, objectives and policies of the applicable Fresno General Plan; (2) The Project is suitable for the type and density of development; (3) The Project is safe from potential cause or introduction of serious public health problems; and, (4) The Project would not conflict with any public interests in the subject property or adjacent lands. Implementation of mitigation measure 2.1.7-a will ensure that impacts remain less than significant.

iii. Environmental Effects of the Project that Cannot be Mitigated to a Less Than Significant Level.

- None

iv. Cumulative Environmental Effects of the Project that Will Have a Less Than Significant Impact on the Environment.

- None

v. Cumulative Environmental Effects of the Project that Will Have a Significant Impact on the Environment.

- None

L. Mineral Resources

i. Environmental Effects of the Project Found to Have No Impact on the Environmental or Have a Less Than Significant Impact on the Environment.

- **Impact 3.12-1**: 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.
- **Impact 3.12-2:** Result in the loss of locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan.

ii. Environmental Effects of the Project that are Potentially Significant, but that can be Mitigated to a Less Than Significant Level.

- None

iii. Environmental Effects of the Project that Cannot be Mitigated to a Less Than Significant Level.

- None

iv. Cumulative Environmental Effects of the Project that Will Have a Less Than Significant Impact on the Environment.

- None

v. Cumulative Environmental Effects of the Project that Will Have a Significant Impact on the Environment.

- None

M. Noise

i. Environmental Effects of the Project Found to Have No Impact on the Environmental or Have a Less Than Significant Impact on the Environment.

- **Impact 3.13-2**: Generation of excessive groundborne vibration or groundborne noise levels.
- **Impact 3.13-3**: 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, the project would expose people residing or working in the project area to excessive noise levels.

ii. Environmental Effects of the Project that are Potentially Significant, but that can be Mitigated to a Less Than Significant Level.

- None

iii. Environmental Effects of the Project that Cannot be Mitigated to a Less Than Significant Level.

- **Impact 3.13-1**: The proposed Project would result in 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.

  Significant Effect: Project-related traffic would result in exterior noise levels at one modeled receptor location (Identified as R-6 in the Project's Environmental Noise Assessment, which was attached as Appendix F to the Draft SEIR) to increase by approximately 3 dB. The City of Fresno General Plan Noise Element considers an increase of 3 dB or more to be a significant impact.

Description of Specific Impacts: Implementation of the proposed Project would result in long-term operational noise impacts from development of the residential and commercial components of the Project. The majority of long-term noise impacts are generated from vehicle trips associated with the development. With full buildout of the Project, exterior noise levels will be exceeded at one location (Identified as R-6). Thus, the Project would result in the generation of a substantial permanent increase in ambient noise levels in excess of standards established in the City's General Plan.

Finding: The Project will generate noise levels in excess of established thresholds at one location (Identified as R-6). While it may be possible by means of the construction of an individual sound wall at this receptor location, mitigation of traffic noise impacts is more difficult to achieve for existing noise-sensitive uses due to the many complications associated with working with individual landowners to implement noise mitigation measures such as sound wall construction and often create access issues. It therefore may not be feasible to achieve successful noise mitigation for this noise sensitive use that could be impacted by the Project. Impacts are therefore considered significant and unavoidable.

There are no feasible mitigation measures that would reduce the identified significant impact to a level below significant. This impact would remain significant and unavoidable even with mitigation measures incorporated to the maximum extent feasible. As further explained in the Statement of Overriding Considerations, the City finds that there are specific overriding economic, legal, social, technological, and other benefits of the project that outweigh the significant and unavoidable impacts and make infeasible the mitigation measures or project alternatives identified in the Final SEIR. (14 CCR § 15091(a)(3).)

Rationale for the Finding: CEQA requires that all feasible and reasonable mitigation be applied to reduce the Project's cumulative impacts to the environment caused by the incremental increase in ambient noise levels to the Project area. All feasible mitigation measures to reduce the impact have been implemented and there are no additional feasible or reasonable mitigation measures that can reduce this impact to a level that is less than significant. Impacts will remain significant and unavoidable.

iv. Cumulative Environmental Effects of the Project that Will Have a Less Than Significant Impact on the Environment.

- None

v. Cumulative Environmental Effects of the Project that Will Have a Significant Impact on the Environment.

- **Impact 3.13-1**: The proposed Project would result in 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.

  Significant Effect: Project-related traffic would result in exterior noise levels at one modeled receptor location (Identified as R-6 in the Project's Environmental Noise Assessment, which was attached as Appendix F to the Draft SEIR) to increase by approximately 3 dB. The City of Fresno General Plan Noise Element considers an increase of 3 dB or more to be a significant impact.

  Description of Specific Impacts: Implementation of the proposed Project would result in long-term cumulative operational noise impacts from development of the residential and commercial components of the Project. The majority of long-term cumulative noise impacts are generated from vehicle trips associated with the development. With full buildout of the Project, exterior noise levels will be exceeded at one location (Identified as R-6). Thus, the Project would result in the generation of a substantial permanent increase in ambient noise levels in excess of standards established in the City's General Plan.

  Finding: The Project will generate noise levels in excess of established thresholds at one location (Identified as R-6). While it may be possible by means of the construction of an individual sound wall at this receptor location, mitigation of traffic noise impacts is more difficult to achieve for existing noise-sensitive uses due to the many complications associated with working with individual landowners to implement noise mitigation measures such as sound wall construction and often create access issues. It therefore may not be feasible to achieve successful noise mitigation for this noise sensitive use that could be impacted by the Project. Impacts are therefore considered cumulatively significant and unavoidable.

There are no feasible mitigation measures that would reduce the identified significant impact to a level below significant. This impact would remain cumulatively significant and unavoidable even with mitigation measures incorporated to the maximum extent feasible. As further explained in the Statement of Overriding Considerations, the City finds that there are specific overriding economic, legal, social, technological, and other benefits of the project that outweigh the significant and unavoidable impacts and make infeasible the mitigation measures or project alternatives identified in the Final SEIR. (14 CCR § 15091(a)(3).)

Rationale for the Finding: CEQA requires that all feasible and reasonable mitigation be applied to reduce the Project's cumulative impacts to the environment caused by the incremental increase in ambient noise levels to the Project area. There are no feasible or reasonable mitigation measures that can reduce this impact to a level that is less than significant. Cumulative impacts will remain significant and unavoidable.

N. Population & Housing

i. Environmental Effects of the Project Found to Have No Impact on the Environmental or Have a Less Than Significant Impact on the Environment.

- **Impact 3.14-1**: Induce substantial unplanned population growth in an area, either directly or indirectly.
- **Impact 3.14-2**: Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.

ii. Environmental Effects of the Project that are Potentially Significant, but that can be Mitigated to a Less Than Significant Level.

- None

iii. Environmental Effects of the Project that Cannot be Mitigated to a Less Than Significant Level.

- None

iv. Cumulative Environmental Effects of the Project that Will Have a Less Than Significant Impact on the Environment.

- None

v. Cumulative Environmental Effects of the Project that Will Have a Significant Impact on the Environment.

- None

O. Public Services

i. Environmental Effects of the Project Found to Have No Impact on the Environmental or Have a Less Than Significant Impact on the Environment.

- None

ii. Environmental Effects of the Project that are Potentially Significant, but that can be Mitigated to a Less Than Significant Level.

- **Impact 3.15-1**: 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?
  Police protection?
  Schools?
  Parks?
  Other public facilities?

  Finding: Changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant effects on the environment. (14 CCR § 15091(a)(1).)

  Rationale for the Finding: The City has determined that it can accommodate the Project with existing facilities and personnel. The Project Applicant will be required to pay development impact fees for fire protection, police protection, schools, parks or other public facilities as determined by the City to receive such services (Mitigation Measure PUB-1). Therefore, after mitigation, there is a less than significant impact.

iii. Environmental Effects of the Project that Cannot be Mitigated to a Less Than Significant Level.

- None

iv. Cumulative Environmental Effects of the Project that Will Have a Less Than Significant Impact on the Environment.

- None

v. Cumulative Environmental Effects of the Project that Will Have a Significant Impact on the Environment.

- None

P. Recreation

i. Environmental Effects of the Project Found to Have No Impact on the Environmental or Have a Less Than Significant Impact on the Environment.

- None

ii. Environmental Effects of the Project that are Potentially Significant, but that can be Mitigated to a Less Than Significant Level.

- **Impact 3.16-1**: 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.

  Finding: Changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant effects on the environment. (14 CCR § 15091(a)(1).)

  Rationale for the Finding: Per POSS-1-a of the City's General Plan, the proposed Project will require the installation of at least 28.8 acres of parks / recreational facilities. Since there are 18.05 acres of existing facilities, the Project will be required to construct at least an additional 10.75 acres of park and/or recreational facilities to meet the Project's recreational needs based on the City's requirements of 28.8 acres. This will be implemented through mitigation measure REC-1. Therefore, with mitigation, the Project will provide sufficient park and recreational facilities per the City's requirements and will not significantly increase the demand on existing parks and recreation facilities. The impact is less than significant.

- **Impact 3.16-2**: Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

  Finding: Changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant effects on the environment. (14 CCR § 15091(a)(1).)

  Rationale for the Finding: Per POSS-1-a of the City's General Plan, the proposed Project will require the installation of at least 28.8 acres of parks / recreational facilities. Since there are 18.05 acres of existing facilities, the Project will be required to construct at least an additional 10.75 acres of park and/or recreational facilities to meet the Project's recreational needs based on the City's requirements of 28.8 acres. This will be implemented through mitigation measure REC-1. Therefore, with mitigation, the Project will provide sufficient park and recreational facilities per the City's requirements and will not significantly increase the demand on existing parks and recreation facilities. The impact is less than significant.

iii. Environmental Effects of the Project that Cannot be Mitigated to a Less Than Significant Level.

- None

iv. Cumulative Environmental Effects of the Project that Will Have a Less Than Significant Impact on the Environment.

- None

v. Cumulative Environmental Effects of the Project that Will Have a Significant Impact on the Environment.

- None

Q. Transportation

i. Environmental Effects of the Project Found to Have No Impact on the Environmental or Have a Less Than Significant Impact on the Environment.

- **Impact 3.17-3**: Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).
- **Impact 3.17-4**: Result in inadequate emergency access.

ii. Environmental Effects of the Project that are Potentially Significant, but that can be Mitigated to a Less Than Significant Level.

- **Impact 3.17-1**: Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities.

Finding: Changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant effects on the environment. (14 CCR § 15091(a)(1).)

Rationale for the Finding: Implementation of the proposed Project would generate additional traffic in the Project area and will exceed existing level of service (LOS) thresholds. While LOS is no longer the criteria of significance for traffic impacts under CEQA, the City of Fresno General Plan includes policies that utilize LOS to determine project conditions of approval. To mitigate the Project's LOS impacts, mitigation measures TRA-1 and TRA-2 have been incorporated into the Project that will reduce the Project's impacts to a less than significant level at the project level (Existing Plus Project and Near Term Plus Project scenarios). These mitigation measures consist of payment into the Fresno Major Street Impact Fee, Traffic Signal Mitigation Impact Fee and the Regional Transportation Mitigation Fee. The Project will also be responsible for paying its fair share cost percentages and/or constructing the recommended improvements (subject to reimbursement costs that are in excess of the Project's equitable responsibility). With implementation of mitigation measures TRA-1 and TRA-2, the impacts would be less than significant at the project level (Existing Plus Project and Near Term Plus Project scenarios).

iii. Environmental Effects of the Project that Cannot be Mitigated to a Less Than Significant Level.

- **Impact 3.**17-2: Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b).

Significant Effect: At full buildout, the Project would exceed the City's Vehicle Miles Traveled (VMT) targets for residential and commercial components of the Project.

Description of Specific Impacts: Implementation of the proposed Project would generate additional traffic in the Project area and will exceed existing VMT targets for residential and commercial developments. The Project's target VMT for residential is 14.0 VMT per capita and for commercial, it is 22.3 VMT per employee. Depending on the location within the development, Project VMT ranges from 16.1 to 45.3 VMT per capita (after mitigation). Therefore, the Project would conflict with or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b).

Finding: The Project will generate additional traffic in the Project area and will exceed existing VMT targets for residential and commercial developments. Implementation of mitigation measure TRA-3 will reduce VMT impacts, but not to a less than significant level. This mitigation measure consists of implementation of Project design features such as bikeways, pedestrian facilities, accessibility, traffic calming measures, and other VMT reduction measures. However, even after implementation of these measures, the Project's VMT impact is significant.

There are no additional feasible mitigation measures that would reduce the identified significant impact to a level below significant. As further explained in the Statement of Overriding Considerations, the City finds that there are specific overriding economic, legal, social, technological, and other benefits of the project that outweigh the significant and unavoidable impacts and make infeasible the mitigation measures or project alternatives identified in the Final SEIR. (14 CCR § 15091(a)(3).)

Rationale for the Finding: CEQA requires that all feasible and reasonable mitigation be applied to reduce the Project's cumulative impacts to the environment caused by significant increases in Project-related VMT. All feasible mitigation measures to reduce the impact have been implemented and there are no additional feasible or reasonable mitigation measures that can reduce this impact to a level that is less than significant. Impacts will remain significant and unavoidable.

iv. Cumulative Environmental Effects of the Project that Will Have a Less Than Significant Impact on the Environment.

- None

v. Cumulative Environmental Effects of the Project that Will Have a Significant Impact on the Environment.

- **Impact 3.17-1**: Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities.

  Significant Effect: Under cumulative conditions, the Project would conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities.

  Description of Specific Impacts: Implementation of the proposed Project would generate additional traffic in the Project area and will exceed existing level of service (LOS) thresholds. While LOS is no longer the criteria of significance for traffic impacts under CEQA, the City of Fresno General Plan includes policies that utilize LOS to determine project conditions of approval.

  Finding: To mitigate the Project's LOS impacts, mitigation measures TRA-1 and TRA-2 have been incorporated into the Project that will reduce the Project's impacts to a less than significant level at the project level (Existing Plus Project and Near Term Plus Project scenarios). These mitigation measures consist of payment into the Fresno Major Street Impact Fee, Traffic Signal Mitigation Impact Fee and the Regional Transportation Mitigation Fee. The Project will also be responsible for paying its fair share cost percentages and/or constructing the recommended improvements (subject to reimbursement costs that are in excess of the Project's equitable responsibility). With implementation of mitigation measures TRA-1 and TRA-2, the impacts would be less than significant at the project level (Existing Plus Project and Near Term Plus Project scenarios). However, at the cumulative level (under the Year 2035 Cumulative scenario), the impact remains significant and unavoidable. As identified in the Project's Draft and Final SEIR, some of the recommended improvements identified in TRA – 1 and TRA – 2 are infeasible due to the existing built nature. Friant Road is constrained to six lanes. Thus,

improvements at the intersections of Friant Road/Audubon Drive, Fresno Street/Friant Road and SR 41/Friant Road are infeasible. Thus, after implementation of all feasible mitigation and conditions of approval, the Project would have a significant and unavoidable cumulatively considerable contribution by conflicting with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities.

There are no additional feasible mitigation measures that would reduce the identified significant impact to a level below significant. As further explained in the Statement of Overriding Considerations, the City finds that there are specific overriding economic, legal, social, technological, and other benefits of the project that outweigh the significant and unavoidable impacts and make infeasible the mitigation measures or project alternatives identified in the Final SEIR. (14 CCR § 15091(a)(3).)

Rationale for the Finding: CEQA requires that all feasible and reasonable mitigation be applied to reduce the Project's cumulative impacts to the environment caused by significant increases in Project-related LOS impacts. All feasible mitigation measures to reduce the impact have been implemented and there are no additional feasible or reasonable mitigation measures that can reduce this impact to a level that is less than significant. Cumulative impacts will remain significant and unavoidable.

- **Impact 3.**17-2: Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b).

Significant Effect: At full buildout, the Project would exceed the City's Vehicle Miles Traveled (VMT) targets for residential and commercial components of the Project.

Description of Specific Impacts: Implementation of the proposed Project would generate additional traffic in the Project area and will exceed existing VMT targets for residential and commercial developments. The target VMT for residential is 14.0 VMT per capita and for commercial, it is 22.3 VMT per employee. Depending on the location within the development, Project VMT

ranges from 16.1 to 45.3 VMT per capita (after mitigation). Therefore, the Project would conflict with or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b).

Finding: The Project will generate additional traffic in the Project area and will exceed existing VMT targets for residential and commercial developments. Implementation of mitigation measure TRA-3 will reduce VMT impacts, but not to a less than significant level. This mitigation measure consists of implementation of Project design features such as bikeways, pedestrian facilities, accessibility, traffic calming measures, and other VMT reduction measures. However, even after implementation of these measures, the Project's VMT impact is significant and unavoidable.

There are no additional feasible mitigation measures that would reduce the identified significant impact to a level below significant. As further explained in the Statement of Overriding Considerations, the City finds that there are specific overriding economic, legal, social, technological, and other benefits of the project that outweigh the significant and unavoidable impacts and make infeasible the mitigation measures or project alternatives identified in the Final SEIR. (14 CCR § 15091(a)(3).)

Rationale for the Finding: CEQA requires that all feasible and reasonable mitigation be applied to reduce the Project's cumulative impacts to the environment caused by significant increases in Project-related VMT. All feasible mitigation measures to reduce the impact have been implemented and there are no additional feasible or reasonable mitigation measures that can reduce this impact to a level that is less than significant. Cumulative impacts will remain significant and unavoidable.

R. Tribal Cultural Resources

i. Environmental Effects of the Project Found to Have No Impact on the Environmental or Have a Less Than Significant Impact on the Environment.

- **Impact 3.18-1**: 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.

ii. Environmental Effects of the Project that are Potentially Significant, but that can be Mitigated to a Less Than Significant Level.

- None

iii. Environmental Effects of the Project that Cannot be Mitigated to a Less Than Significant Level.

- None

iv. Cumulative Environmental Effects of the Project that Will Have a Less Than Significant Impact on the Environment.

- None

v. Cumulative Environmental Effects of the Project that Will Have a Significant Impact on the Environment.

- None

S. Utilities & Service Systems

i. Environmental Effects of the Project Found to Have No Impact on the Environmental or Have a Less Than Significant Impact on the Environment.

- **Impact 3.19-4**: 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.
- **Impact 3.19-5**: Comply with federal, state, and local management and reduction statutes and regulations related to solid waste.

ii. Environmental Effects of the Project that are Potentially Significant, but that can be Mitigated to a Less Than Significant Level.

- **Impact 3.19-1**: 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.

  Finding: Changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant effects on the environment. (14 CCR § 15091(a)(1).)

  Rationale for the Finding: The Project will require that utilities be extended to serve the proposed development, including water, wastewater, stormwater, electric power, natural gas and telecommunications facilities. Extension or construction of utilities will be the responsibility of the Project Developer. The improvements required to tie into existing utilities are included in the Project Description of the Draft SEIR and the environmental impacts of extending these utilities are analyzed within the Draft SEIR under the various CEQA Appendix G topics. Numerous mitigation measures were included throughout the Draft SEIR document which are applicable to these activities. With implementation of the mitigation measures, the impact is less than significant.

- **Impact 3.19-2**: Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years.

  Finding: Changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant effects on the environment. (14 CCR § 15091(a)(1).)

  Rationale for the Finding: Water supplies constructed for the original 706 acres (as analyzed in the 2003 FEIR) are sufficient to meet the currently proposed Project build-out water demands for the 706 acre area. For the new 109 acre area, the Developer shall pay the Water Capacity Fee, as specified in the City's Master Fee Schedule, for all new connections to the City's water system (See Mitigation Measure HYD – 2B). As such, there is a less than

significant impact to this impact area. Mitigation Measures HYD – 2A and HYD – 2B will help ensure that impacts remain less than significant.

- **Impact 3.19-3**: 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.

  Finding: Changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant effects on the environment. (14 CCR § 15091(a)(1).)

  Rationale for the Finding: The existing sewer mains near the Project site are sized to accommodate land uses planned in the City of Fresno's General Plan. The Project area is served by existing sewer lines and the Project will be responsible for construction of smaller sewer lines to connect to the Project site and for its fair-share of payments for trunk fees; these fees will be collected pursuant to the City's UGM policies. The Project is not anticipated to cause any violation of any existing permit because of the "typical" content - B.O.D. and suspended solids - of the waste discharge associated with the Project. The City of Fresno Public Works Department has reviewed the Project and determined that it can accommodate the wastewater generated from the Project. In addition, implementation of mitigation measures 2.8.1-a, 2.8.1-b, 2.8.1-d, 2.8.2-a, 2.8.2-b, 2.8.2-c, 2.8.3-a, 2.8.3-b, 2.8.4-d, and 2.8.5-a will result in a less than significant impact.

iii. Environmental Effects of the Project that Cannot be Mitigated to a Less Than Significant Level.

- None

iv. Cumulative Environmental Effects of the Project that Will Have a Less Than Significant Impact on the Environment.

- None

v. Cumulative Environmental Effects of the Project that Will Have a Significant Impact on the Environment.

- None

T. Wildfire

i. Environmental Effects of the Project Found to Have No Impact on the Environmental or Have a Less Than Significant Impact on the Environment.

- **Impact 3.20-1**: Substantially impair an adopted emergency response plan or emergency evacuation plan.
- **Impact 3.20-2:** 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.
- **Impact 3.20-3**: 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.
- **Impact 3.20-4**: 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.

ii. Environmental Effects of the Project that are Potentially Significant, but that can be Mitigated to a Less Than Significant Level.

- None

iii. Environmental Effects of the Project that Cannot be Mitigated to a Less Than Significant Level.

- None

iv. Cumulative Environmental Effects of the Project that Will Have a Less Than Significant Impact on the Environment.

- None

v. Cumulative Environmental Effects of the Project that Will Have a Significant Impact on the Environment.

- None

3.0 Findings Regarding Considerations Which Make Certain Alternatives Analyzed in the Final SEIR Infeasible

CEQA Guidelines Section 15126.6 requires the consideration of a range of reasonable alternatives to the proposed Project that could feasibly attain most of the objectives of the proposed Project. The 2003 FEIR provided an analysis of Project Alternatives (refer to pages 3.3.1 – 3.3.9 of the 2003 FEIR) which are summarized as follows:

- No Development Alternative: This Alternative evaluated the impacts of no development (the undeveloped areas remain vacant).
- No Project Alternative: This Alternative evaluated the impacts of developing the site in accordance with underlying land use designations (consistent with the 2003 FEIR).
- Increased Density: This Alternative evaluated the impacts of developing the site with greater residential densities with a larger number of units and a larger population.
- Decreased Density: This Alternative evaluated the impacts of developing the site with lower residential densities and a smaller number of units and associated population.

This Draft SEIR retained similar alternatives, with some modifications as follows:

- **No Development Alternative:** Under this Alternative, the unbuilt portions of the site would remain vacant and unoccupied.
- **No Project Alternative:** Under this Alternative, the site would be developed according to the 2003 FEIR and the addition of the 109 acres to the Project would not occur. The additional 109-acre area would also retain its existing land use designations where development could proceed with residential development as identified in the City's General Plan.
- **Increased Project Density:** Under this Alternative, the site would be developed with increased residential densities which would result in a greater number of units and an increase in population as compared to the proposed Project.
- **Reduced Project Density:** Under this Alternative, the site would be developed with reduced residential densities which would result in development of fewer number of units and a decrease in population as compared to the proposed Project.

The consideration of alternatives is an integral component of the CEQA process. The selection and evaluation of a reasonable range of alternatives provides the public and decision-makers with information on ways to avoid or lessen environmental impacts created by a proposed project. When selecting alternatives for evaluation, CEQA requires alternatives that meet most of the basic objectives of the project, while avoiding or substantially lessening the project's significant effects.

Four alternatives to the project were defined and analyzed in the Final SEIR which concluded that each alternative would not meet, either in part or in whole, the project goals to the same extent as the proposed Project. Therefore, none of the alternatives would be better than the Project when balancing the avoidance of environmental impacts, the project benefits, and policy considerations.

The following alternatives are described and evaluated in the Final SEIR and are summarized below.

No Development Alternative (unbuilt site remains vacant and unoccupied)

CEQA Section 15126.6(e) requires the discussion of the No Project Alternative "to allow decision makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project." The No Project scenario in this case consists of retaining the property in its original configuration, with no construction or operation of any development on the proposed site. Under this alternative, the site remains vacant and no new development would occur on the site.

Description

This alternative would avoid both the adverse and beneficial effects of the project. This alternative would avoid site-disturbance and construction-related impacts associated with construction of the proposed Project. The No Project Alternative would avoid the generation of any environmental impacts.

Conclusion and Relationship to Project Objectives

Continuation of the site as vacant and unoccupied would result in all environmental impacts being less than the proposed Project. There would be no changes to any of the existing conditions and there would be no impact to each of the 20 CEQA Checklist evaluation topics. The No-Project Alternative by definition would not meet any of the objectives of the proposed Project.

No Project Alternative (Site is developed according to existing Land Use and Zoning designations and the 2003 FEIR)

Description

The No Project scenario in this case consists of retaining the property in its existing configuration, with development occurring under existing General Plan and Zoning designations. Under this Alternative, the additional 109 acres would not be added to the Development and no land use changes would occur within the existing Copper River Ranch Development. Specifically, under this Alternative, the Project would be built out as evaluated in the 2003 FEIR. The additional 109-acre area

would also retain its existing land use designations where development could proceed with residential development as identified in the City's General Plan.

Under this scenario, the site could be developed as follows:

	Residential	**Commercial**
Existing 706.5-acre Copper River Ranch (2003 FEIR)	2,837 units	250,000 sq. ft.
109-acre area	756 units*	-
Total:	3,593 units	250,000 sq. ft.

** This is derived by calculating the maximum density allowed under the existing land use designations of the 109 acres.*

This Alternative could result in the development of up to 3,593 residential units and up to 250,000 square feet of commercial development.

This Alternative would not avoid site-disturbance and construction/operation-related impacts associated with development of the proposed Project. Construction and operation under existing Land Use and Zoning Designations would result in environmental impacts that are likely equal to or in some cases greater than the proposed Project since it could theoretically result in more residential units than the proposed Project (the proposed Project includes up to 3,216 units versus 3,593 that could be developed under this Alternative).

Environmental Considerations

Most of the environmental issues associated with this Alternative would be similar to those of the proposed Project. However, this alternative does likely increase impacts to the following areas:

- Air Quality / Greenhouse Gases: The site could potentially be developed with up to 3,593 total dwelling units, which is approximately 377 more than the proposed Project. Therefore, it is likely that this Alternative would result in a larger number of vehicle trips, and thus greater air quality and greenhouse gas impacts.
- Energy: The site could potentially be developed with up to 3,593 total dwelling units, which is approximately 377 more than the proposed Project. Therefore, it is likely that this Alternative would result in increased development, a larger population, an increased number of vehicle trips, and thus greater energy impacts.
- Hydrology: The site could potentially be developed with up to 3,593 total dwelling units, which is approximately 377 more than the proposed Project. Therefore, it is likely that this Alternative would result in a greater demand for water.
- Noise: The site could potentially be developed with up to 3,593 total dwelling units, which is approximately 377 more than the proposed Project. Therefore, it is likely that this Alternative

would result in a larger number of vehicle trips and a larger population and thus would likely result in increased noise impacts.

- Public Services: The site could potentially be developed with up to 3,593 total dwelling units, which is approximately 377 more than the proposed Project. Therefore, it is likely that this Alternative would result in a larger population than the proposed Project. This would result in greater public services impacts to: police, fire, schools and other public services.
- Traffic: The site could potentially be developed with up to 3,593 total dwelling units, which is approximately 377 more than the proposed Project. Therefore, it is likely that this Alternative would result in a larger number of vehicle trips, and thus greater transportation impacts.

Impacts to other environmental topics such as biological resources, cultural resources, geology and soils, minerals, wildfire, etc. would remain similar to the proposed Project since this Alternative would occur on the same footprint as the proposed Project.

Note: As discussed under this Alternative, development of the site could theoretically occur according to existing land use designations. However, if individual projects are proposed for future development, this could result in piece-mealed environmental analysis if individual projects are processed on a case-by-case basis. One benefit of preparing a single environmental document for a large development rather than conducting environmental analysis on a parcel-by-parcel basis, is that cumulative impacts can be identified and impacts such as from air emissions, water demand, public services, transportation, etc. can be reviewed as a whole to determine impacts.

Conclusion and Relationship to Project Objectives

Development under this Alternative could result in a greater number of residential units than under the proposed Project. This Alternative would therefore likely result in greater environmental impacts as compared to the proposed Project. Therefore, this Alternative is rejected on the grounds that it would not reduce potential environmental impacts.

Increased Project Density

Description

This Alternative would develop the site (both the existing unbuilt portions of Copper River Ranch and the additional 109 acres) with increased residential densities. This would likely require additional General Plan land use and Zoning designation changes to accommodate an increase in allowable density per acre. This would result in the elimination of larger residential lots which would be replaced with smaller lots and/or additional multi-family development. A corresponding increase in population would occur. For purposes of this analysis, an increase in development density of 25%

would be assumed. The proposed Project could result in the development of up to 3,216 residential units, thus under this Alternative, the Project could result in up to 4,020 residential units.

Environmental Considerations

Most of the environmental issues associated with this alternative would be similar to those of the proposed Project. However, this alternative does likely increase impacts to the following areas:

- Aesthetics: The site could potentially be developed with up to 4,020 total dwelling units, which is approximately 804 more than the proposed Project. Therefore, it is likely that this Alternative would result less in more intense development which would result in a corresponding decrease in open space. The impacts to aesthetics would be increased.
- Air Quality / Greenhouse Gases: The site could potentially be developed with up to 4,020 total dwelling units, which is approximately 804 more than the proposed Project. Therefore, it is likely that this Alternative would result in a larger number of vehicle trips, and thus greater air quality and greenhouse gas impacts.
- Energy: The site could potentially be developed with up to 4,020 total dwelling units, which is approximately 804 more than the proposed Project. Therefore, it is likely that this Alternative would result in increased development, a larger population, an increased number of vehicle trips, and thus greater energy impacts.
- Hydrology: The site could potentially be developed with up to 4,020 total dwelling units, which is approximately 804 more than the proposed Project. Therefore, it is likely that this Alternative would result in a greater demand for water.
- Noise: The site could potentially be developed with up to 4,020 total dwelling units, which is approximately 804 more than the proposed Project. Therefore, it is likely that this Alternative would result in a larger number of vehicle trips and a larger population and thus would likely result in increased noise impacts.
- Population and Housing: The site could potentially be developed with up to 4,020 total dwelling units, which is approximately 804 more than the proposed Project. Therefore, it is likely that this Alternative would result in a larger population than the proposed Project.
- Public Services: The site could potentially be developed with up to 4,020 total dwelling units, which is approximately 804 more than the proposed Project. Therefore, it is likely that this Alternative would result in a larger population than the proposed Project. This would result in greater public services impacts to: police, fire, schools and other public services.
- Recreation: The site could potentially be developed with up to 4,020 total dwelling units, which is approximately 804 more than the proposed Project. Therefore, it is likely that this Alternative would result in a larger population than the proposed Project. This would result in greater impacts to recreational facilities.

- Transportation: The site could potentially be developed with up to 4,020 total dwelling units, which is approximately 804 more than the proposed Project. Therefore, it is likely that this Alternative would result in a larger number of vehicle trips, and thus greater transportation impacts.
- Utilities and Service Systems: The site could potentially be developed with up to 4,020 total dwelling units, which is approximately 804 more than the proposed Project. Therefore, it is likely that this Alternative would result in a larger population than the proposed Project. This would result in greater impacts to utilities such as water, stormwater, wastewater (sewer), and solid waste services.

Although most of the environmental issues associated with this Alternative would be similar or greater than those of the proposed Project, this Alternative may decrease impacts to some environmental topic areas. The increased density may act to preserve prime agricultural soils elsewhere in the City's Planning Area by drawing more residents to higher density areas rather than developing additional farmland around the City. In addition, higher densities would likely result in a larger variety of housing types (including smaller single-family lots, additional multi-family housing, townhomes, etc.) which could theoretically result in a wider range of housing affordability.

Impacts to other environmental topics such as biological resources, cultural resources, geology and soils, minerals, wildfire, etc. would remain similar to the proposed Project since this Alternative would occur on the same footprint as the proposed Project.

Conclusion and Relationship to Project Objectives

This Alternative would increase the residential density of the Project by eliminating the larger sized lots and replacing them with smaller lots and/or multi-family developments. This does not meet the Project objective of providing a variety of housing opportunities with a complete range of densities, styles, sizes and values.

Reduced Project Density

This Alternative would develop the site (both the existing unbuilt portions of Copper River Ranch and the additional 109 acres) with decreased residential densities. This would likely require additional General Plan land use and Zoning designation changes to accommodate a decrease in allowable density per acre. This may result in the elimination of some of the smaller single-family lots as well as some of the multi-family components of the proposed Project. A corresponding decrease in population would occur. For purposes of this analysis, a decrease in development density of 25% would be assumed. The proposed Project could result in the development of up to 3,216 residential

units, thus under this Alternative, the Project could result in the development of up to 2,412 residential units.

Environmental Considerations

Most of the environmental issues associated with this Alternative would be less than those of the proposed Project as follows:

- Aesthetics: The site could potentially be developed with up to 2,412 total dwelling units, which is approximately 804 less than the proposed Project. Therefore, it is likely that this Alternative would result less compact development which would result in a corresponding increase in open space. The impacts to aesthetics would be reduced.
- Air Quality / Greenhouse Gases: The site could potentially be developed with up to 2,412 total dwelling units, which is approximately 804 less than the proposed Project. Therefore, it is likely that this Alternative would result in a fewer number of vehicle trips, and thus less air quality and greenhouse gas impacts.
- Energy: The site could potentially be developed with up to 2,412 total dwelling units, which is approximately 804 less than the proposed Project. Therefore, it is likely that this Alternative would result in less development, a smaller population, a decreased number of vehicle trips, and thus less energy impacts.
- Hydrology: The site could potentially be developed with up to 2,412 total dwelling units, which is approximately 804 less than the proposed Project. Therefore, it is likely that this Alternative would result in less demand for water.
- Noise: The site could potentially be developed with up to 2,412 total dwelling units, which is approximately 804 less than the proposed Project. Therefore, it is likely that this Alternative would result in fewer number of vehicle trips and a smaller population and thus would likely result in decreased noise impacts.
- Population and Housing: The site could potentially be developed with up to 2,412 total dwelling units, which is approximately 804 less than the proposed Project. Therefore, it is likely that this Alternative would result in a smaller population than the proposed Project.
- Public Services: The site could potentially be developed with up to 2,412 total dwelling units, which is approximately 804 less than the proposed Project. Therefore, it is likely that this Alternative would result in a smaller population than the proposed Project. This would result in less public services impacts to: police, fire, schools and other public services.
- Recreation: The site could potentially be developed with up to 2,412 total dwelling units, which is approximately 804 less than the proposed Project. Therefore, it is likely that this Alternative would result in a smaller population than the proposed Project. This would result in less impacts to recreational facilities.

- Transportation: The site could potentially be developed with up to 2,412 total dwelling units, which is approximately 804 less than the proposed Project. Therefore, it is likely that this Alternative would result in fewer vehicle trips, and thus less transportation impacts.
- Utilities and Service Systems: The site could potentially be developed with up to 2,412 total dwelling units, which is approximately 804 less than the proposed Project. Therefore, it is likely that this Alternative would result in a smaller population than the proposed Project. This would result in less impacts to utilities such as water, stormwater, wastewater (sewer), and solid waste services.

Impacts to other environmental topics such as biological resources, cultural resources, geology and soils, minerals, wildfire, etc. would remain similar to the proposed Project since this Alternative would occur on the same footprint as the proposed Project. Impacts to Land Use and Planning may be increased due to the passage of Senate Bill 330 (SB 330) which prohibits the down-zoning of any property unless concurrent up-zoning of residential density occurs simultaneously on other off-site lands within the City limits of Fresno. Since this Alternative would require substantial down-zoning, impacts to Land Use and Planning would be increased.

Conclusion and Relationship to Project Objectives

This Alternative would decrease the residential density of the Project by eliminating the smaller sized lots and multi-family components and replacing them with larger lots and less density. This does not meet the Project objective of providing a variety of housing opportunities with a complete range of densities, styles, sizes and values.

Environmentally Superior Alternative

Based on a review of the alternatives evaluated in this chapter, the No Project (no development) Alternative would result in the fewest impacts on the environment. However, the No Project Alternative would not meet the City's objectives, as identified in this chapter.

Apart from the No Project Alternative, the Reduced Density Alternative would be the Environmentally Superior alternative because it would result in less adverse physical impacts to the environment compared to the proposed Project. However, the Reduced Density Alternative does not meet all of the Project objectives.

Summary and Determination

Only the No Project and Reduced Density Project Alternatives could potentially result in fewer environmental impacts than the proposed Project's impacts. These alternatives however, would not fully meet the objectives of the proposed Project, such as:

- To provide a variety of housing opportunities with a complete range of densities, styles, sizes, and values which are designed to satisfy the identified increasing demand of the existing and future population base.
- To provide for commercial and office development sufficient to accommodate the needs of the Project population of the Project.
- To provide the ability, through flexible zoning conditions, to develop mixed-use projects, which combine a variety of uses on one parcel.