Exhibit L

APPENDIX G/INITIAL STUDY FOR A MITIGATED NEGATIVE DECLARATION

Environmental Checklist Form for:

Environmental Assessment Application No. T-6376/P21-05373/P21-05090

1.	**Project title:** **Environmental Assessment Application No. T-6376/P21-05373/P21-05090**
2.	**Lead agency name and address:** City of Fresno Planning and Development Department 2600 Fresno Street Fresno, CA 93721
3.	**Contact person and phone number:** Juan Lara, Planner III City of Fresno Planning and Development Department (559) 621-8039
4.	**Project location:** *Located on the west side of S. Armstrong Avenue, between the San Joaquin Valley Railroad and East Church Avenue, in the City and County of Fresno County, California* (see Figures 1 and 2). Site Latitude: 36.7212 º N - 36º 43' 16.41" Site Longitude: 119.6754º W - 119 º 40' 31.61" Mount Diablo Base & Meridian, Township 14S, Range 21E, Section 15 Assessor's Parcel Number(s): 316-160-16S, -17S, -43S, -59S and -61S.

5.	**Project sponsor's name and address:** Bonadelle Communities 7030 N. Fruit Ave #101 Fresno, CA 93711
6.	**General & Community plan land use designation:** **General Plan:** Current: Medium Density Residential Proposed: Medium Density Residential Community Plan: Roosevelt Community Plan
7.	**Zoning:** Current: AL 20 (*Limited Agriculture, 20 Acre Parcel*) - Fresno County Proposed: RS-5/UGM (*Residential Single-Family, Medium Density/Urban Growth Management*)
8.	**Description of project:** Pre-zone Application No. P21-05373, Annexation Application No. P21-05090 and Vesting Tentative Tract Map No. 6376 were filed by Bonadelle Neighborhoods (herein, "Project Applicant"). The Project is located on the west side of South Armstrong Avenue, between the San Joaquin Valley Railroad and East Pitt Avenue, within Fresno County (APNs 316-160-16s, -17s, -43s, -59s, and -61s). Pre-zone Application No. P21-05373 requests authorization to change to the City of Fresno official zone map for the Project site from the AL20 (Agriculture, 20-acre parcel, Fresno County) zone district to the City of Fresno RS-5/UGM (*Single-Family Residential, Medium Density/Urban Growth Management*) zone district. Annexation Application No. P21-05090 proposes to detach from the King River Conservation District and Fresno County Fire Protection District and annexation to the City of Fresno. Vesting Tentative Tract Map No. 6376 proposes the subdivision of the approximately 34.7-acre site into 202 single-family residential lots approximate lot size will range

from 6,300 square feet to 4,445 square feet with public streets, sidewalks and a 0.39-acre park. There will be three access points from S. Armstrong Avenue. All required improvements are proposed and will be installed by the developer as part of the Project. See Figure 3.

There are three existing residences with wells on the eastern portion of the site along S. Armstrong Avenue which will be demolished as part of the Project.

Construction

The proposed Project includes the construction of a 202-lot single-family development with the associated public road and utility improvements. The site currently consists of three residential dwellings with associated wells, and vacant land that is regularly disked for weed control. Construction will take approximately 24 months with construction starting in mid to late 2025.

It is anticipated that the following pieces of equipment would be used during construction activities:

1. Roller;
2. Large bulldozer;
3. Loaded trucks;
4. Excavator;
5. Generator;
6. Service truck; and
7. Air compressor.

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

	Planned Land Use	Existing Zoning	Existing Land Use
North	Residential, Medium Low Density	**RS-4** Residential Single Family, Medium Low Density (City of Fresno)	Single-Family Residential
East	Residential, Medium Low Density	**RS-4** Residential Single Family, Medium Low Density (City of Fresno)	Single-Family Residential
South	Residential, Medium Density	**AL-20** Limited Agriculture (Fresno County)	Agriculture
West	Residential, Medium Density	**AL-20** Limited Agriculture (Fresno County)	Vacant

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

Planning and Development Department, Building and Safety Services Division, Department of Public Works, Department of Public Utilities, Fire Department, Fresno Metropolitan Flood Control District, Fresno Irrigation District, PG&E, Sanger Unified School District, County of Fresno Department of Community Health, County of Fresno Department of Public Works and Planning, and San Joaquin Valley Air Pollution Control District.

11. **Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code**

(PRC) Section 21080.3.1? If so, has consultation begun?

The State requires lead agencies to consider the potential effects of proposed projects and consult with California Native American tribes during the local planning process for the purpose of protecting Traditional Tribal Cultural Resources through the California Environmental Quality Act (CEQA) Guidelines. Pursuant to PRC Section 21080.3.1, the lead agency shall begin consultation with the California Native American tribe that is traditionally and culturally affiliated with the geographical area of the proposed project. Such significant cultural resources are either sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a tribe which is either on or eligible for inclusion in the California Historic Register or local historic register, or, the lead agency, at its discretion, and support by substantial evidence, choose to treat the resources as a Tribal Cultural Resources (PRC Section 21074(a)(1-2)). According to the most recent census data, California is home to 109 currently recognized Indian tribes. Tribes in California currently have nearly 100 separate reservations or Rancherias. Fresno County has a number of Rancherias such as Table Mountain Rancheria, Millerton Rancheria, Big Sandy Rancheria, Cold Springs Rancheria, and Squaw Valley Rancheria. These Rancherias are not located within the city limits.

Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See PRC Section 21083.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per PRC Section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that PRC Section 21082.3(c) contains provisions specific to confidentiality.

Pursuant to Assembly Bill 52 (AB 52). The City of Fresno mailed notices of the proposed to the Table Mountain Rancheria Tribe and The Dumna Wo Wah Tribe on April 15, 2022, which included the required 30-day time period for tribes to request consultation, which ended on May 16, 2022. All tribes which were contacted declined consultation.

Figure 1 – Project Location

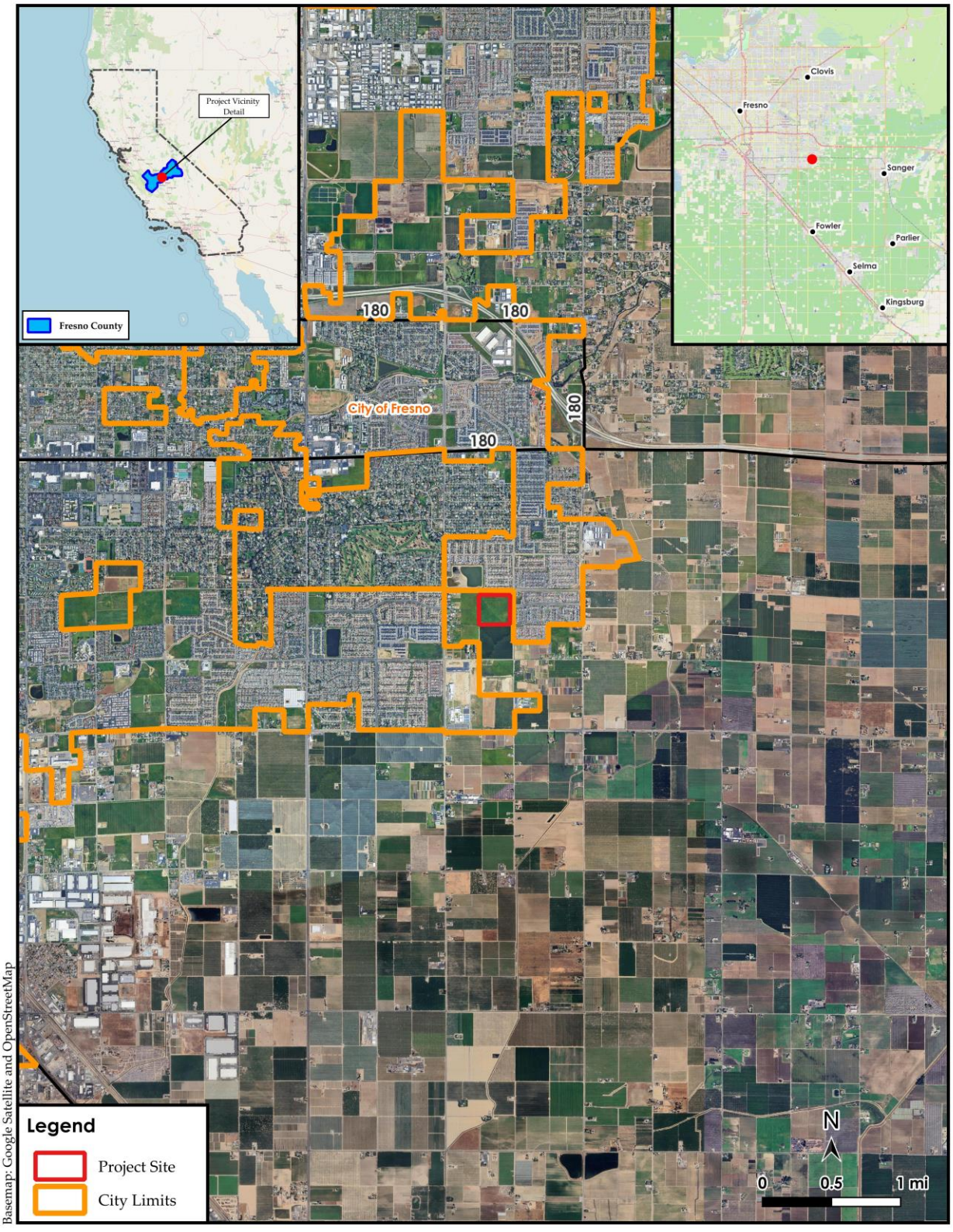
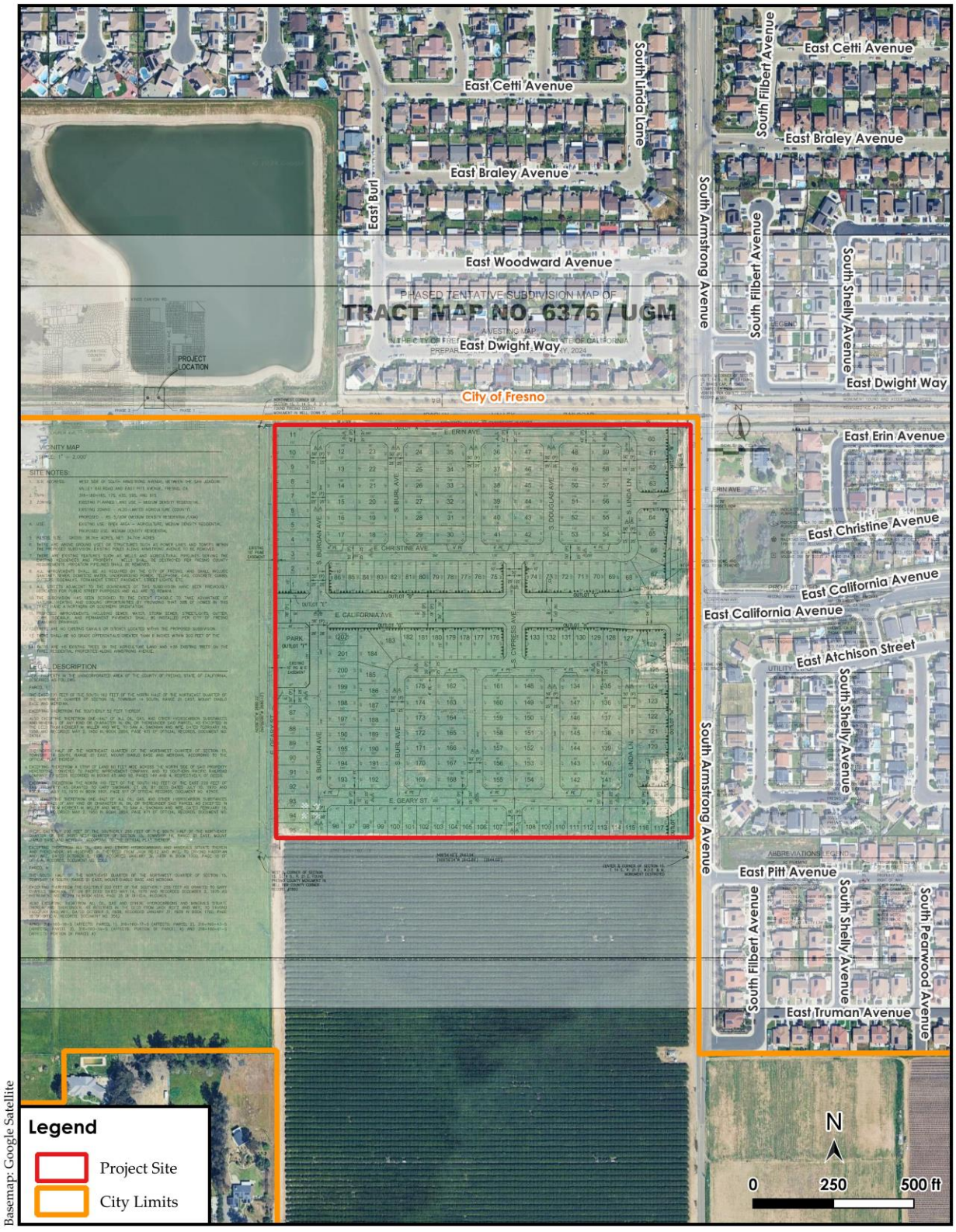


Figure 3 – Site Plan



FACTORS POTENTIALLY AFFECTED:

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

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

DETERMINATION: (To be completed by the Lead Agency)

On the basis of this initial evaluation:

___	I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

X	I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
___	I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT (EIR) is required.
___	I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An EIR is required, but it must analyze only the effects that remain to be addressed.
___	I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

April 24, 2025

Juan Lara, Planner III — Date

City of Fresno, Planning and Development Department

EVALUATION OF ADDITIONAL ENVIRONMENTAL IMPACTS:

For purposes of this Initial Study, the following answers have the corresponding meanings:

a. “No Impact” means the specific impact category does not apply to the project, or that the record sufficiently demonstrates that project specific factors or general standards applicable to the project will result in no impact for the threshold under consideration.

b. “Less Than Significant Impact” means there is an impact related to the threshold under consideration, but that impact is less than significant.

c. “Less Than Significant with Mitigation Incorporation” means there is a potentially significant impact related to the threshold under consideration, however, with the mitigation incorporated into the project, the impact is less than significant.

d. “Potentially Significant Impact” means there is substantial evidence that an effect may be significant related to the threshold under consideration.

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

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

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

5. "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies

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

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

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

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

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

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

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

9. The explanation of each issue should identify:

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

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

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

DISCUSSION

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

No Impact. A scenic vista is a viewpoint that provides a distant view of highly valued natural or man-made landscape features for the benefit of the general public. Typical scenic vistas are locations where views of rivers, hillsides, and open space areas can be obtained as well as locations where valued urban landscape features can be viewed in the distance.

The City of Fresno General Plan (GP) identifies six locations along the San Joaquin River bluffs as designated vista points from which views should be maintained. The scenic views from the San Joaquin River bluffs are not expected to be substantially affected. As such, future development associated with the continued implementation of the approved General Plan would result in a less than significant impact on existing designated vista points.

According to the GP scenic views are also attributed to public views of buildings in Downtown Fresno that provide a skyline within the Planning Area. Due to relatively flat topography, intervening land uses, and landscaping, views of the skyline are primarily limited to areas within the Downtown Fresno area. Limited views of existing high-rise buildings in Downtown Fresno are visible from portions of elevated freeways, including State Route (SR) 41, SR 99, and SR 180. The continued implementation of the approved General Plan would allow future development in the Downtown area, which could include additional high rises. While views of scenic resources in the Downtown Fresno area may be partially obstructed following future development as allowed by the approved General Plan, existing development in these areas currently inhibits views of scenic vistas.

The proposed Project site is located in an area designated for residential zoning uses by the City. The site is outside of the San Joaquin River bluffs and Downtown Fresno area. The parcels to the north and east, beyond S. Armstrong Avenue and the SJVR, have also been developed into subdivision neighborhoods. According to the biological due diligence letter (see Appendix B), a site survey was conducted on March 25, 2021. At the time, the site consisted of loose, recently-disked soil, except for two residences on site, which will be demolished with Project implementation. Site vegetation is comprised mostly of grasses, but some low-growing forbs are also present. Plan height is currently low, with grasses and forbs 1-6 inches tall. The site can be characterized as annual grassland in the process of re-establishment. The existing topography of the site is nearly flat, with an elevation of approximately 323 feet above

mean sea level (amsl). There are no significant trees, rock outcroppings, and/or historic buildings located on the subject property that have been identified as important scenic resources.

There will be *no impacts* to scenic vistas.

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

No Impact. The Project site is in an agricultural and residential area in the City of Fresno and there are no scenic vistas or other protected scenic resources on or near the site. There are no scenic highways near the proposed site. The nearest eligible State Scenic Highway is Hwy 168, south of Shaw Avenue, approximately 7.3 miles to the northwest and Hwy 180 east of Frankwood Avenue, approximately 12 miles east of the site.[1] Miles of intervening land uses separate the Project site from either stretch of eligible State Scenic Highway. As such, there is *no impact*.

c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Less Than Significant Impact. The proposed Project is located near the eastern Fresno City limit in an area historically utilized for agricultural development. The proposed Project site was used for agricultural purposes prior to 1937 but has been composed of the existing residences and associated outbuildings since 1979.[2] These residences, along with existing features such as wells and power lines, will be demolished or removed as part of the Project. It has been designated by the General Plan for urban development. The proposed Project would alter the existing visual character of public views of the site from vacant land with two dilapidated single story residences to fully developed with a 202-lot single-family residential development which would include a mix of one and two story residences. Also included in the

1 California State Scenic Highway Map. https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa. Accessed December 2024.

2 Phase I Environmental Site Assessment for Simonian Estates. RMA GeoScience, October 27, 2023.

development are the associated improvements such as an internal roadway and landscaping. 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 Planning and Development Department. The plans shall be required prior to issuance of any building permits.

The Project will require demolition of all existing structures, as well as removal of existing trees and shrubs. Curb and gutters, electrical panels and pedestrian sidewalks are incorporated into the project design, along with site landscaping.

As part of the proposed Project, the site will be annexed and pre-zoned from AL 20/Limited Agriculture (Fresno County) to RS-5/Medium Density Residential (City of Fresno), to be consistent with the proposed Project density and with the residential development immediately to the east and north. Once pre-zoned, the proposed Project will be in compliance with the requirements of the Medium Density Residential Zone.

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 consistent with regulations governing scenic quality The Project itself is not visually imposing against the scale of the existing landscape and nature of the surrounding area.

Therefore, the Project would have *less than significant impacts* on the visual character of the area.

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

Less Than Significant with Mitigation Incorporated. The proposed Project would result in new lighting sources on the site consistent with adjacent residential development. New lighting sources would include interior lighting from residences, street lighting, lighting from passing vehicles and security lighting. All street and

landscape lighting will be consistent with the lighting set forth in Section 15-2508 of the Fresno Municipal Code (FMC), which states that “lights shall be placed to deflect light away from adjacent properties and public streets, and to prevent adverse interference with the normal operation or enjoyment of surrounding properties.” It also states that “windows shall not cause glare that may disrupt adjoining properties, traffic on adjacent streets, etc.” Implementation of mitigation measure AES-1, which includes shielding street lighting to reduce glare, will further reduce potential impacts resulting from street lighting.

The proposed Project may produce temporary light and glare from construction activities, which could stem from construction vehicle and equipment lighting. However, most construction work is anticipated to take place during daylight hours, and lighting will be directed away from surrounding homes to minimize disruption. The construction-related light will cease once Project construction has finished.

Adherence to the FMC and mitigation measure AES-1 will ensure potential impacts resulting from new sources of light and glare will remain *less than significant.*

Mitigation Measures:

The proposed Project shall implement and incorporate the Visual resource related mitigation measure as identified in the attached Project Specific Mitigation Monitoring Checklist dated April 24, 2025.

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

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

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?			X	
d) Result in the loss of forest land or conversion of forest land to non-forest use?				X
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?				X

DISCUSSION

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

Less Than Significant Impact. The site is outside the City limits in an area historically used for agricultural purposes; however, the surrounding areas are now substantially built up with residential uses. This Project is contiguous to an existing urbanized area and would a be natural progression that allows orderly and consistent development of residences to meet the growing demand for housing in the City. The site is designated for residential development by the City of Fresno General Plan.

The California Department of Conservation, Important Farmland Finder Program considers the Project site to be primarily *Farmland of Local Importance,*[3] aside from the portions of the parcels on the eastern boundary containing the residences, which are designated *Urban and Built-Up Land*. *No Prime Farmland, Farmland of Statewide Importance,* or *Unique Farmland* is found on the proposed Project site. As such, there would be no significant farmland conversion. *Impacts resulting from farmland conversion are* **less than significant***.*

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

No Impact. The site is zoned as AL-20 (Limited Agriculture) by Fresno County. The Applicant proposes re-zoning the Project site as RS-5/UGM (Residential Single Family, Medium Density), as per the City of Fresno General Plan zoning designations. The site is not subject to a Williamson Act contract and no mitigation is required. There is *no impact.*

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

No Impact. The site is located on the floor of the San Joaquin Valley and does not contain any forest land or timberland. As mentioned in Impact b), above, the site is zoned as AL-20 (Limited Agriculture) by Fresno County. The Applicant proposes re-

3 California Department of Conservation. California Important Farmland Finder. https://maps.conservation.ca.gov/DLRP/CIFF/. Accessed December 2024.

zoning the Project site as RS-5 (Residential Single Family, Medium Density), as per the City of Fresno General Plan zoning designations. The proposed Project would not conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production, and no mitigation is necessary. There is *no impact*.

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

No Impact. As described in Impact c) above, there is no forest land on the Project site. There is *no impact.*

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

No Impact. As discussed in Impacts a) and c) above, there is no impact to agricultural land and there is no forest land on-site. The proposed Project will not involve new other changes in the existing environment that could result in conversion of Farmland. Impacts are *less than significant.*

Mitigation Measures

None are required.

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

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?			X	

The following analysis is based primarily on the Air Quality, Energy and Greenhouse Gas Emissions Technical Memorandum performed on behalf of the proposed Project by LSA Consulting, report dated December 24, 2024 (see Appendix A).

DISCUSSION

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

Less Than Significant Impact with Mitigation Incorporation.

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

To assure the SJVAB's continued attainment of the U.S. Environmental Protection Agency (USEPA) respirable particulate matter (PM10) standard, the SJVAPCD adopted the 2007 PM10 Maintenance Plan in September 2007.

SJVAPCD Regulation VIII (Fugitive PM10 Prohibitions) is designed to reduce PM10 emissions generated by human activity. The SJVAPCD adopted the 2018 plan for the

1997, 2006, and 2012 fine particulate matter (PM2.5) standard to address the USEPA federal annual PM2.5 standard of 12 µg/m3, established in 2012. The SJVAPCD has established project construction and operational emissions thresholds for criteria pollutants, as shown in Table 1 and 2 below. For a project to be consistent with SJVAPCD attainment plans, the pollutants emitted from project operation should not exceed the SJVAPCD daily thresholds, cause a significant impact on air quality, or the project must already have been included in the attainment plans projection.

Construction Emissions

During construction, short-term degradation of air quality may occur due to the release of particulate matter emissions (i.e. fugitive dust) generated by excavation activities. Emissions from construction equipment are also anticipated and would include CO, NOx, reactive organic gases (ROGs), directly emitted PM2.5 or PM10, and TACs (e.g. DPMs).

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

Water or other soil stabilizers can be used to control dust, resulting in emission reductions of 50 percent or more. The SJVAPCD has established Regulation VIII measures for reducing fugitive dust emissions (PM_{I0}). With the implementation of Regulation VIII measures, fugitive dust emissions from construction activities would not result in adverse air quality impacts.

In addition to dust-related PM_{I0} emissions, heavy trucks and construction equipment powered by gasoline and diesel engines would generate CO, sulfur oxides {SO_X}, NO_X, ROGs, and some soot particulate {$PM_{2.5}$ and PM_{I0}} in exhaust emissions. If construction activities were to increase traffic congestion in the area, CO and other emissions from traffic would increase slightly while those vehicles idle in traffic. These

emissions would be temporary in nature and limited to the immediate area surrounding the construction site.

Construction emissions were estimated for the Project using CalEEMod and are summarized in Table 1. Consequently, the construction emissions for the Project basis are *less than significant.*

Table 1: Construction Air Pollutant Emissions[4]

Year	**Emissions (tons per year)**				
	ROG	**NOx**	**CO**	**PM10**	**PM2.5**
2025	0.1	4.5	3.4	0.6	0.3
2026	0.1	2.5	2.2	0.2	0.1
2027	0.1	2.5	2.1	0.2	0.1
2028	1.3	1.5	1.3	0.1	0.1
Maximum Emissions	1.3	4.5	3.4	0.6	0.3
SJVAPCD Significance threshold (tons/year	10	10	100	15	15
Exceed threshold—significant impact?	No	No	No	No	No

Notes: Source: Compiled by LSA (2024)

CO=carbon monoxide

NOX=nitrogen oxides

PM2.5=particulate matter less than 2.5 microns in size

PM10=particulate matter less that 10 microns in size

ROG=reactive organic gases

SJVAPCD=San Joaquin Valley Air Pollution Control District

4 *Air Quality, Energy and Greenhouse Gas Emissions Technical Memorandum for Residential Tract 6376*, LSA Consulting. Report dated December 24, 2024. Page 31.

As shown in Table 1, construction emissions associated with the proposed Project would not exceed the SJVAPCD's thresholds for ROG, NO_x, CO, PM_{l0}, and $PM_{2.5}$ emissions. In addition to the construction period thresholds of significance, the SJVAPCD has implemented Regulation VIII measures for dust control during construction, which will further reduce construction emissions.

Operational Emissions

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

Mobile source emissions include ROG and NO_X emissions that contribute to the formation of ozone. Additionally, PM_{10} emissions result from running exhaust, tire and brake wear, and the entrainment of dust into the atmosphere from vehicles traveling on paved roadways.

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

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

Long-term operational emissions associated with the proposed Project were calculated using CalEEMod. Table 2 provides the proposed Project's estimated operational emissions.

Table 2: Operational Air Pollutant Emissions[5]

5 Ibid, page 33.

Source	Emissions (tons per year)				
	ROG	**NOx**	**CO**	**PM10**	**PM2.5**
Mobile	1.1	1.0	6.7	1.6	0.4
Area	1.8	<0.1	1.0	<0.1	<0.1
Energy	0.0	0.0	0.0	0.0	0.0
Total	**2.9**	**1.1**	**8.3**	**1.6**	**0.4**
Significance threshold	10	10	100	15	15
Exceed threshold—significant impact?	No	No	No	No	No

Notes: ROG = reactive organic gases NOx = nitrogen oxides CO = carbon monoxide PM10 and PM2.5 = particulate matter

Area source emissions include emissions from natural gas, landscape, and painting.

Source: Compiled by LSA (2024)

The results shown in Table 2 indicate the proposed Project would not exceed the significance criteria for annual ROG, NO_X, CO, PM_{l0}, or $PM_{2.5}$ emissions. Therefore, operation of the proposed Project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment under an applicable federal or State AAQS. Thus, any impacts are considered *less than significant*.

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

Less Than Significant Impact. The Air Basin is in non-attainment for ozone, PM10, and PM2.5, which means that certain pollutants' exposure levels are often higher than the normal air quality requirements. The air quality standards have been set to protect

public health, particularly the health of vulnerable people. Therefore, if the concentration of those contaminants exceeds the norm, some susceptible individuals in the population are likely to experience health effects. The health effects are therefore a factor in the dose-response curve. Concentration of the pollutant in the air, the length of time exposed and the individual's reaction are factors that affect the extent and nature of the health effects. As shown in Table 1 and Table 2, the regional construction and operational emission analysis shows that the Project does not surpass the substantial thresholds of the District and that the Project is compliant with the Air Quality Attainment Plan applicable. Therefore, the Project would not result in significant cumulative health impacts. Impacts are *less than significant.*

c) Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact.

Long-Term Microscale (CO Hot Spot) Analysis

Vehicular trips associated with the proposed Project would contribute to congestion at intersections and along roadway segments in the vicinity of the proposed Project site. Localized air quality impacts would occur when emissions from vehicular traffic increase as a result of the proposed Project. The primary mobile-source pollutant of local concern is CO, a direct function of vehicle idling time and, thus, of traffic flow conditions. CO transport is extremely limited; under normal meteorological conditions, it disperses rapidly with distance from the source. However, under certain extreme meteorological conditions, CO concentrations near a congested roadway or intersection may reach unhealthful levels, affecting local sensitive receptors (e.g., residents, schoolchildren, the elderly, and hospital patients).

Typically, high CO concentrations are associated with roadways or intersections operating at unacceptable levels of service or with extremely high traffic volumes. In areas with high ambient background CO concentrations, modeling is recommended to determine a project's effect on local CO levels.

An assessment of project-related impacts on localized ambient air quality requires that future ambient air quality levels be projected. Existing CO concentrations in the immediate Project vicinity are not available. Ambient CO levels monitored at Fresno-Garland station, the closest station to the Project site, showed a highest recorded 1-

hour concentration of 2.2 ppm (the State standard is 20 ppm) and a highest 8-hour concentration of 1.8 ppm (the State standard is 9 ppm) during the past 3 years. The highest CO concentrations would normally occur during peak traffic hours; hence, CO impacts calculated under peak traffic conditions represent a worst-case analysis. Reduced speeds and vehicular congestion at intersections result in increased CO emissions.

The proposed Project is estimated to generate 1,914 average daily trips, including 142 trips during the peak a.m. hour and 191 trips during the peak p.m. hour. Therefore, given the extremely low level of CO concentrations in the Project area and the vehicles are not expected to result in CO concentrations exceeding the State or federal CO standards. No CO hot spots would occur, and the Project would not result in any project-related impacts on CO concentrations.

Health Risk on Nearby Sensitive Receptors

Sensitive receptors are defined as residential uses, schools, daycare centers, nursing homes, and medical centers. Individuals particularly vulnerable to diesel particulate matter are children, whose lung tissue is still developing, and the elderly, who may have serious health problems that can be aggravated by exposure to diesel particulate matter. The Project site is surrounded primarily by residential and agricultural uses. The closest sensitive receptors to the Project site include a single-family home located east of the Project site within 135 feet. The nearest worker receptor to the Project site is located approximately 2,000 feet southeast of the Project site. The nearest school receptor to the Project site is located approximately 1,700 feet south of the Project site, across North South Armstrong Avenue.

A construction HRA, which evaluates construction-period health risk to off-site receptors, was performed for the proposed Project. Table 3, below, identifies the results of the analysis assuming the use of Tier 2 construction equipment as proposed by the Project.

Table 3: Health Risks from Project Construction to Off-Site Receptors[6]

6 Ibid, page 34.

Location	Carcinogenic Inhalation Health Risk in One Million	Chronic Inhalation Hazard Index	Acute Inhalation Hazard Index
Residential Receptor Risk	11.57	<0.01	0.0
Worker Receptor Risk	<0.01	<0.01	0.0
School Receptor	0.04	<0.01	0.0
Significance threshold	20.0 in one million	1.0	1.0
Exceed threshold—significant impact?	**No**	**No**	**No**

As shown in Table 3, the maximum cancer risk for the residential receptor MEI would be 11.57 in one million, which would not exceed the SJVAPCD cancer risk threshold of 20 in one million. The worker receptor risk would be less than 0.01 in 1 million and the school receptor MEI would be 0.04 in 1 million, which would not exceed the SJVAPCD cancer risk thresholds. The total chronic HI would be less than 0.01 all receptors, which is below the threshold of 1.0. In addition, the total acute HI would be nominal (0.000), which would also not exceed the threshold of 1.0. Therefore, construction of the proposed Project would not exceed SJVAPCD thresholds and would not expose nearby sensitive receptors to substantial pollutant concentrations.

Furthermore, the proposed Project would include the construction of a 202unit, single-family residential development. As identified in Table 2, Project operational emissions of criteria pollutants would be below SJVAPCD significance thresholds; thus, they are not likely to have a significant impact on sensitive receptors. In addition, the proposed

Project would be required to implement District Rule 9510, Indirect Source Review (ISR). Implementation of Rule 9510 would reduce operational emissions of NO_X and PM_{10} by 33.3 percent and 50 percent, respectively. Compliance with SJVAPCD rules would further limit doses and exposures, reducing potential health risk related to gasoline vapors to a level that is not significant. Once the proposed Project is constructed, the proposed Project would not be a source of substantial emissions and would not result in new sources of TACs. Therefore, the Project would not expose sensitive receptors to substantial levels of TACs.

Naturally Occurring Asbestos

The Project is in Fresno County, which is among the counties found to have serpentine and ultramafic rock in their soils. However, according to the California Geological Survey, no such rock has been identified in the Project vicinity. Therefore, the potential risk for naturally occurring asbestos during Project construction is small and would not be significant.

Valley Fever

The Project site is surrounded primarily by residential uses. The closest sensitive receptors to the Project site include a single-family home located east and north of the Project site within 125 feet. Except under high wind conditions, this distance is sufficient that particulate matter would settle prior to reaching the nearest sensitive receptor. In addition, crosswinds influenced by the adjacent roadways would help dissipate any particulate matter associated with the construction phase of the Project. Therefore, any Valley fever spores suspended with the dust would not be anticipated to reach the sensitive receptors. However, during Project construction, it is possible that workers could be exposed to Valley fever through fugitive dust. Dust control measures, such as regulating visible dust emissions, requiring soil stabilizers, and regulating on-site speed limits, consistent with SJVAPCD Regulation VIII, would reduce the exposure to the workers and sensitive receptors.

The Project should therefore not expose susceptible receptors to significant air pollutant concentrations during operation. Impacts to sensitive receptors will be *less than significant.*

d) Result in other emissions (such as those leading to odors) adversely affecting

a substantial number of people?

Less Than Significant Impact. The SJVAPCD addresses odor criteria within the GAMAQI. The district has not established a rule or standard regarding odor emissions, rather, the district has a nuisance rule: "Any project with the potential to frequently expose members of the public to objectionable odors should be deemed to have a significant impact."

During Project construction, some odors may be present due to diesel exhaust. However, these odors would be temporary and limited to the construction period. Residential uses are not anticipated to emit any objectionable odors. Any odors in general would be confined mainly to the Project site and would readily dissipate. Therefore, the proposed Project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people. Impacts resulting from creating objectionable odors are *less than significant.*

Mitigation Measures

None Required.

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
IV. BIOLOGICAL RESOURCES – Would the project:				

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?		X		
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?				X

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				X
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?		X		
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?			X	

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?				X

The following analysis is based primarily on the Biological Due Diligence letter prepared on behalf of the proposed Project by H.T. Harvey & Associates, dated April 15, 2021 (see Appendix B).

DISCUSSION

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

Less than Significant Impact with Mitigation Incorporation. The proposed Project includes five parcels, which are partially developed by three existing residences and other associated structures. The site consists of loose, recently-disked soil, except for the residences located on the property. Approximately 11 acres in the southwest corner and along the central part of the southern border have been disked since the spring 2020 growing season and are sparsely vegetated. The remainder of the site also shows signs of recent disking, but currently is approximately 95% covered in vegetation, with the remainder consisting of bare soil. Garbage is relatively abundant, especially in the northwest corner. Overall, the site conditions are currently unsuitable for special-status plant species. Vegetation on the site is comprised mostly of grasses,

but some low-growing forbs are also present (see Appendix B). Plant height is currently low, with grasses and forbs 1-6 inches tall. The site can be characterized as annual grassland in the process of re-establishment; however, as a result of past ground disturbance, the Project site is highly suitable for nonnative invasive plants.

The Project site is relatively far from recent records of special-status species. A query of California Natural Diversity Database records occurring within 5 miles of the Project site revealed seven special-status species occurrences, two of which are for Swainson's hawk (*Buteo swainsoni*). The site falls within the extent of a Swainson's hawk occurrence mapped over Fresno that has not been reconfirmed since 1956. The other Swainson's hawk occurrence is based on observations from 2016 and is located 3.5 miles southwest of the project site. In addition, there are two occurrences of burrowing owls (*Athene cunicularia*), one located 4.2 miles to the north at Fresno Yosemite International Airport and another located 4.0 miles to the northwest in Clovis. Also, double-crested cormorant (*Phalacrocorax auritus*) was documented at a collection of ponds 4.8 mi. to the north-northwest in 2012. The remaining records (for least Bell's vireo [*Vireo bellii pusillus*] and western yellow-billed cuckoo [*Coccyzus americanus occidentalis*]) are both over 3.5 miles away from the site and have not been reconfirmed within the last 108 years.

The annual grassland in the Project area potentially provides habitat for common, rural and urban-adapted wildlife species, such as ground-foraging and -nesting birds, California ground squirrels (*Otospermophilus beecheyi*), pocket gophers (*Thomomys bottae*), and desert cottontail (*Sylvilagus audobonii*). Wildlife directly observed on the project site consisted of common bird species and the remains of two California ground squirrels. Several individuals of each of four common bird species (mourning dove [Zenaida macroura], California scrub-jay [*Aphelocoma californica*], dark-eyed junco [*Junco hyemalis*], and European starling [*Sturnus vulgaris*]) were observed perched on and flying around the line of trees on the southern border of the Project site. Numerous small mammal burrows occur on the Project site. Several active pocket gopher burrows were found scattered across the site. The site also currently supports a large population of California ground squirrels. Their burrows were abundant at the edge and along the slopes of the detention pond and were moderately abundant throughout the rest of the site. The California ground squirrel remains were located within 1 foot of burrows of this species and represent predation and/or

scavenging, perhaps by red-tailed hawks or other raptors. No signs of mammalian predators (e.g. coyotes [*Canis latrans*]) were observed. All animal species observed directly on or near (i.e., within 0.25 mi.) the Project site are listed in Appendix A within Appendix B. Many of the California ground squirrel burrows are large (about 3-5 inches in diameter), with large, unvegetated aprons, and thus are potentially suitable for use by burrowing owls, which is listed as Species of Special Concern by the State of California. No burrowing owls or signs of this species (e.g. pellets, feathers, or wash) were observed. However, the survey was conducted during conditions of light to moderately heavy rain in the middle of a rain event lasting several days. Any owls present would have been underground in their burrows, and their wash would have been rinsed away. The occurrence of potentially suitable burrows suggests that burrowing owls might be present. No direct evidence of special-status animal or plant species was observed and the site provides little or no value to sensitive plant and wildlife species with the exception of burrowing owl. The presence of burrowing owls on the property could constrain the development of the parcel or result in project delays. Burrowing owls, and their nests are protected under state laws and regulations, including the California Fish and Game Code Section 3503.5.

Based on current understanding of burrowing owl distribution in the Central Valley, burrowing owls are unlikely to occupy this site. The size of the parcel and the adjacent similar parcel west combined with the number of suitable burrows on the site, however, warrant a cautious approach. Implementation of Mitigation Measure BIO-1, which includes measures outlined in the CDFW Staff Report on Burrowing Owl, such as conducting construction during non-nesting season, will ensure that a *less than significant impact* to burrowing owl occurs.

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

No Impact. There are no riparian habitats or other sensitive natural communities identified in local or regional plans, policies, or regulation or by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service in the subject site. Additionally, there are no natural waterways or sensitive natural communities on the subject site or in the immediate vicinity. As such, there is *no impact.*

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

No Impact. There are no state or federally protected wetlands on the subject site.[7] As such, there is *no impact.*

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

Less Than Significant Impact with Mitigation Incorporation. As previously mentioned, the site contains single-family residences and highly disturbed vacant land, periodically disked for weed control, and is substantially surrounded by urban development. This precludes the ability of wildlife species to freely move throughout the area creating a migratory corridor. Project development could, however, impede the use of nursery sites for native birds protected under the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code (CFGC). Migratory birds could potentially nest on and near the trees surrounding the existing buildings on 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 can be considered a "take" under the MBTA and CFGC. Loss of fertile eggs or nesting birds, or any activities resulting in nest abandonment, could constitute a significant effect if the species is particularly rare in the region. Construction activities such as excavating, trenching, and grading that disturb a nesting bird on the Project site or immediately adjacent to the construction zone could constitute a significant impact Mitigation Measure BIO-2, which includes conducting construction during non-nesting season, shall be implemented to reduce the potential effect to a *less than significant level*.

e) Conflict with any local policies or ordinances protecting biological resources,

7 US Fish and Wildlife Service. National Wetlands Inventory Surface Waters and Wetlands Mapper. https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/. Accessed December 2024.

such as a tree preservation policy or ordinance?

Less Than Significant Impact. The City's General Plan Parks, Open Space, and Schools Element contains several objectives and policies pertaining to the protection of biological resources. Most of the policies pertain to general long-term protection and preservation of biological resources including providing buffers for natural areas, implementing habitat restoration where applicable, protection/enhancement of the San Joaquin River area, and other similar policies. Since the Project is located in a highly disturbed area with minimal biological resources and does not include significant impacts to protected plant or animal species, the Project does not conflict with any adopted policies pertaining to biological resources. The Project is also required to implement Fresno Municipal Code Chapter 13, Article 3 – Street Trees and Parkways pertaining to tree removal and replacement. Therefore, there is a *less than significant impact.*

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

No Impact. The Pacific Gas & Electric (PG&E) San Joaquin Valley Operation and Maintenance (O&M) Habitat Conservation Plan (HCP) was approved in 2007 and covers portions of nine counties, including Fresno County and the city of Fresno. This HCP covers PG&E activities which occur as a result of ongoing O&M that would have an adverse impact on any species covered by the HCP. The HCP also provides incidental take coverage from the USFWS and CDFW.

The proposed Project site is not located within the boundaries of any other approved or draft Habitat Conservation Plan (HCP), Natural Community Conservation Plan (NCCP), or other adopted local, regional or state HCP. Therefore, development of the proposed Project would not result in any impacts to an adopted HCP or NCCP. There is *no impact*.

Mitigation Measures

The proposed project shall implement and incorporate the biological resource related mitigation measures as identified in the attached Project Specific Mitigation Monitoring Checklist dated April 24, 2025.

BIO-1: In addition to implementation of the measures included in the Staff Report on Burrowing Owl Mitigation (CDFG 2012), if construction activities occur during the avian nesting season (generally, February 1 through August 31), preconstruction surveys for nesting birds by a qualified ornithologist should be conducted to ensure that no active nests are disturbed during construction. The survey should be conducted no more than seven days before construction activities begin. During this survey, all potential nesting areas should be inspected in and immediately adjacent to the impact areas for nests. If an active nest is found sufficiently close to work areas to be disturbed by these activities, the ornithologist should determine the extent of a construction-free buffer zone to be established around the nest (typically, 300 ft. for raptors and 25–100 ft. for other species) to ensure that no active nests of species protected by the California Fish and Game Code would be disturbed during project construction.

BIO-2: To the extent practicable, construction shall be scheduled to avoid the nesting season, which extends from February through August. If it is not possible to schedule construction between September and January, pre-construction surveys for nesting birds shall be conducted by a qualified biologist to ensure that no active nests would be disturbed during the implementation of the Project. A pre-construction survey shall be conducted no more than 14 days prior to the initiation of construction activities. During this survey, the qualified biologist shall inspect all potential nest substrates in and immediately adjacent to the impact areas. If an active nest is found close enough to the construction area to be disturbed by these activities, the qualified biologist shall determine the extent of a construction-free buffer to be established around the nest. If work cannot proceed without disturbing the nesting birds, work may need to be halted or redirected to other areas until nesting and fledging are completed or the nest has otherwise failed for non-construction related reasons.

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

A Phase I Cultural Resources Survey was conducted by Hudlow Cultural Resource Associates, report date November 2024 (see Appendix C). The Phase I Cultural Resources Survey consisted of a pedestrian survey and a cultural resource record search and is the basis for analysis of the discussion below.

DISCUSSION

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

Less Than Significant Impact with Mitigation Incorporated. For purposes of this section, the term "historical resources" shall include the following: (1) A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (Pub. Res. Code § 5024.1, Title 14 CCR, Section 14 CCR, Section 4850 et seq.). (2) A resource included in a local register of historical resources, as defined in section 5020.1(k) of the Public Resources Code or identified as significant in an historical resource survey meeting the requirements section 5024.1(g) of the Public Resources Code, shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant. (3) Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register of Historical Resources (Pub. Res. Code, § 5024.1, Title 14 CCR, Section 14 CCR, Section 4852) including the following:

(A) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;

(B) Is associated with the lives of persons important in our past;

(C) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or

(D) Has yielded, or may be likely to yield, information important in prehistory or history.

A record search of the Project area and the environs within one half-mile was conducted at the Southern San Joaquin Information Center. Information Center staff conducted the record search, RS# 24-299, on July 8, 2024. The record search

revealed that one cultural resource survey has been conducted within one half-mile of the Project area. No cultural resource surveys have previously addressed the parcel in question. No cultural resources have been located on the current Project area; however, one cultural resource has been recorded within one half-mile of the current Project area, the former Southern Pacific Railroad line, which is operated by the San Joaquin Valley Railroad, which is directly on the project's northern boundary.

Additionally, on November 12-13, 2024, Scott M. Hudlow conducted a pedestrian archaeological survey of the entire proposed Project area. Hudlow surveyed in north/south transects across the lot in 10-meter (33 feet) intervals. No cultural resources were identified or observed; however, three homes were located on the property as recently as 2022, on the west side of Armstrong Avenue. No remains from these three homes survived demolition, except for a non-historic concrete block retaining wall along Armstrong Avenue. If archaeological resources are encountered during the course of construction, a qualified archaeologist should be consulted for further evaluation.

Although no cultural or archaeological resources, paleontological resources or human remains have been identified in the Project area to date, the possibility exists that such resources or remains may be discovered during Project site preparation, excavation and/or grading activities. As such, Mitigation Measure CUL-1 shall be implemented to protect undiscovered resources. Adherence to this mitigation measure will result in a *less than significant impact.*

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

Less Than Significant Impact with Mitigation Incorporated. As discussed in Impact a) above, no surface or recorded evidence of sensitive cultural resources have been recorded. However, the possibility exists that such resources or remains may be discovered during Project site preparation, excavation and/or grading activities. Mitigation Measure CUL – 1 will be implemented to ensure that Project will result in *less than significant impact.*

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

Less Than Significant Impact with Mitigation Incorporated. The discovery of human remains is regulated by California Health and Safety Code Section 7050.5, which states that:

> In the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation…until the coroner…has determined…that the remains are not subject to…provisions of law concerning investigation of 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…. The coroner shall make his or her determination within two working days from the time the person responsible for the excavation, or his or her authorized representative, notifies the coroner of the discovery or recognition of the human remains. If the coroner determines that the remains are not subject to his or her authority and…has reason to believe that they are those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission.

Compliance with California Health and Safety Code Section 7050.5 would reduce potential impacts to human remains to *less than significant.*

Mitigation Measures

The proposed project shall implement and incorporate the cultural resource related mitigation measures as identified in the attached Project Specific Mitigation Monitoring Checklist dated April 24, 2025.

CUL – 1: Should evidence of prehistoric archeological resources be discovered during construction, the contractor shall halt all work within 25 feet of the find and the resource shall be evaluated by a qualified archaeologist. If evidence of any archaeological, cultural, and/or historical deposits is found, hand excavation and/or mechanical excavation shall proceed to evaluate the deposits for determination of significance as defined by the CEQA guidelines. The archaeologist shall submit reports, to the satisfaction of the City of Fresno, describing the testing program and subsequent results. These reports shall identify any program mitigation that the project

proponent shall complete in order to mitigate archaeological impacts (including resource recovery and/or avoidance testing and analysis, removal, reburial, and curation of archaeological resources).

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

The following analysis is based primarily on the Air Quality, Energy and Greenhouse Gas Emissions Technical Memorandum performed on behalf of the proposed Project by LSA Consulting, report dated December 24, 2024 (see Appendix A).

DISCUSSION

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

Less Than Significant Impact. The Project includes construction of a 202-lot single-family residential unit development, including a 0.39-acre park and other associated

improvements. The Project would increase energy usage on a site that is presently demanding minimal energy.

Construction

The anticipated construction schedule assumes that the proposed Project would be built in approximately three years. Construction-specific phases were assessed for their energy consumption under each construction sub-phase: grading, site preparation, building construction, paving, and architectural coating activities.

Construction would require energy for the manufacture and transportation of construction materials, preparation of the site for grading and building activities, and construction of the building. All or most of this energy would be derived from nonrenewable resources. Petroleum fuels (e.g., diesel and gasoline) would be the primary sources of energy for these activities. However, construction activities are not anticipated to result in an inefficient use of energy as gasoline and diesel fuel would be supplied by construction contractors who would conserve the use of their supplies to minimize their costs on the Project. One common practice is to utilize Global Positioning System (GPS) technology on grading equipment to efficiently grade the site. Energy (i.e., fuel) usage on the Project site during construction would be temporary in nature and would be relatively small in comparison to the State's available energy sources.

Operation

Energy use associated with the proposed Project would consist of natural gas, electricity, and vehicle fuel use associated with Project operations.

Table 4 shows the estimated potential increased electricity, gasoline, and diesel demand associated with the proposed Project. The electricity and natural gas rates are from the CalEEMod analysis, and the gasoline and diesel rates are based on the traffic analysis in conjunction with USDOT fuel efficiency data and use the USEPA's fuel economy estimates for 2020 and the California diesel fuel economy estimates for 2021. Energy and Fuel Calculations output sheets are included in Appendix A.

Table 4: Estimated Annual Energy Use of the Proposed Project[8]

8 *Air Quality, Energy and Greenhouse Gas Emissions Technical Memorandum for Residential Tract 6376*, LSA Consulting. Report dated December 24, 2024. Page 37.

	Electricity Use (kWh per year)	Natural Gas Use (kBTU per year)	Gasoline (gallons per year)	Diesel (gallons per year)
Proposed Project	1,897,356	0	159,991	122,720

Source: Compiled by LSA (2024).
kBTU= thousand British thermal units kWh= kilowatt hours

As shown in Table 4, the estimated increase in electricity demand associated with the operation of the proposed Project would be 1,897,356 kWh per year. Total electricity consumption in Fresno County in 2022 was 8,384,408,687 kWh; therefore, operation of the proposed Project would negligibly increase the annual electricity consumption in Fresno County by approximately less than 0.1 percent.

As shown in Table 4, there would not be an increase in natural gas use as the Project is all electric. Therefore, operation of the proposed Project would not increase the annual natural gas consumption in Fresno County.

In addition, the Project would result in energy usage associated with motor vehicle gasoline to fuel project-related trips. As shown above in Table 4, the proposed Project would result in the consumption of 159,991 gallons of gasoline and 122,720 gallons of diesel per year. Based on fuel consumption obtained from EMFAC2021, approximately 337.0 million gallons of gasoline and approximately 154.4 million gallons of diesel will be consumed from vehicle trips in Fresno County in 2028. Therefore, vehicle trips associated with the proposed project would increase the annual fuel use in Fresno County by approximately less than 0.1 percent for gasoline fuel usage and approximately less than 0.1 percent for diesel fuel usage. The proposed Project would result in fuel usage that is a small fraction of current annual fuel use in Fresno County, and fuel consumption associated with vehicle trips generated by Project operations would not be considered inefficient, wasteful, or unnecessary in comparison to other similar developments in the region. Therefore, gasoline demand generated by vehicle trips associated with the proposed Project would be a minimal fraction of gasoline and diesel fuel consumption in California.

Furthermore, the proposed Project would be constructed using energy efficient modern building materials, such as highly efficient insulation, multiple-pane windows and solar panels , and the proposed Project also would use new modern appliances and equipment, in accordance with the Appliance Efficiency Regulations (Title 20, CCR Sections 1601 through 1608). The expected energy consumption during construction and operation of the proposed Project would be consistent with typical usage rates for residential uses; however, energy consumption is largely a function of personal choice and the physical structure and layout of buildings.

PG&E is the private utility that would supply the proposed Project's electricity. In 2021, a total of 50 percent of PG&E's delivered electricity came from renewable sources, including solar, wind, geothermal, small hydroelectric, and various forms of bioenergy. PG&E reached California's 2020 renewable energy goal in 2017 and is positioned to meet the State's 60 percent by 2030 renewable energy mandate set forth in SB 100. In addition, PG&E plans to continue to provide reliable service to its customers and upgrade its distribution systems as necessary to meet future demand. As such, the proposed Project would not result in a potential significant impact due to wasteful, inefficient, or unnecessary consumption of energy resources during Project construction or operation. As such, any impacts are *less than significant*.

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

Less Than Significant Impact. The California Energy Commission (CEC) recently adopted the 2023 Integrated Energy Policy Report. The 2023 Integrated Energy Policy Report provides the results of the CEC's assessments of a variety of energy issues facing California. Many of these issues will require action if the State is to meet its climate, energy, air quality, and other environmental goals while maintaining energy reliability and controlling costs. The 2023 Integrated Energy Policy Report covers a broad range of topics, including decarbonizing buildings, integrating renewables, energy efficiency, energy equity, integrating renewable energy, updates on Southern California electricity reliability, climate adaptation activities for the energy sector, natural gas assessment, transportation energy demand forecasts, and the California Energy Demand Forecast.

As indicated above, energy usage on the Project site during construction would be temporary in nature and would be relatively small in comparison to the State's available energy sources. In addition, energy usage associated with operation of the proposed Project would be relatively small in comparison to the region's available energy sources, and energy impacts would be negligible at the regional level. Because California's energy conservation planning actions are conducted at a regional level, and because the Project's total impact on regional energy supplies would be minor, the proposed Project would not conflict with or obstruct California's energy conservation plans as described in the CEC's 2023 Integrated Energy Policy Report. Therefore, the proposed Project would not lead to new or substantially more severe energy impacts.

For the above reasons, the proposed Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency, and impacts would be *less than significant.*

Mitigation Measures

None required.

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VII. GEOLOGY AND SOILS – Would the project:				
a) Directly or Indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.			X	
ii) Strong seismic ground shaking?			X	
iii) Seismic-related ground failure, including liquefaction?			X	
iv) Landslides?			X	
b) Result in substantial soil erosion or the loss of topsoil?			X	

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?			X	
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?			X	
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?				X
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?		X		

DISCUSSION

a) Directly or indirectly cause potential substantial adverse effects, including

the risk of loss, injury, or death involving:

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

Less Than Significant Impact. According to the Fault Rupture Zones Map prepared by the California Department of Conservation in 2018, the Project site is not located within a Fault-Rupture Hazard Area.[9] Moreover, no active faults have been identified within the City of Fresno. The nearest zoned fault to the City is a portion of the Nunez Fault, located approximately 48 miles southwest of the City. Therefore, because no active faults occur within the City, impacts associated with fault rupture would be *less than significant*.

ii. **Strong seismic ground shaking?**

Less Than Significant Impact. It is anticipated that the proposed Project site would be subject to some ground acceleration and ground shaking associated with seismic activity during its design life. The Project site would be engineered and constructed in strict accordance with the earthquake resistant design requirements contained in the latest edition of the California Building Code (CBC) for seismic zone III, as well as Title 24 of the California Administrative Code, and therefore would avoid potential seismically induced hazards on planned structures. The impact of strong seismic ground shaking on the Project would be *less than significant.*

iii. **Seismic-related ground failure, including liquefaction?**

Less Than Significant Impact. The potential for soil liquefaction within the City of Fresno ranges from very low to moderate due to the variable density of the subsurface soils and the presence of shallow groundwater. The proposed Project will be subject to policies in the Fresno Municipal Code, including

9 California Department of Conservation. California Geological Survey. Fault Activity Map of California. https://maps.conservation.ca.gov/cgs/fam/. Accessed December 2024.

Section 11-101, which would reduce potential settlement and lateral spread impacts to *less than significant* levels.

iv. Landslides?

Less Than Significant Impact. Landslides are the release of rock, soil, or other debris and its subsequent movement down a slope or hillside. Landslides occur during earthquakes, triggered by the strain induced in soil and rock by ground shaking vibrations, and during non-earthquake conditions, most frequently during the rainy season. Any slope of 15 degrees or greater is susceptible to mud or landslides. The Project area is generally flat in nature, with slopes nearly at zero degrees. As such, the Project site is not susceptible to mud or landslides during non-earthquake conditions during the dry or rainy season.

Additionally, the proposed Project site is not located in an earthquake fault zone as delineated by the 1972 Alquist-Priolo Earthquake Fault Zoning Map Act. No active faults have been mapped within the Project boundaries, so there is no potential for fault rupture. It is anticipated that the proposed Project site would be subject to some ground acceleration and ground shaking associated with seismic activity during its design life. The Project site would be engineered and constructed in strict accordance with the earthquake resistant design requirements contained in the latest edition of the California Building Code (CBC) for seismic zone III, as well as Title 24 of the California Administrative Code, and therefore would avoid potential seismically induced hazards on planned structures. The impact of landslides on the Project would be *less than significant.*

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

Less Than Significant Impact. Construction activities associated with the Project involves ground preparation work for the new residential development, streets, and the associated improvements. These activities could expose barren soils to sources of wind or water, resulting in the potential for erosion and sedimentation on and off the Project

site. During construction, nuisance flow caused by minor rain could flow off-site. The City and/or contractor would be required to employ appropriate sediment and erosion control Best Management Practices (BMPs) as part of a Stormwater Pollution Prevention Plan (SWPPP) that is in the California National Pollution Discharge Elimination System (NPDES). In addition, soil erosion and loss of topsoil would be minimized through implementation of the SVJAPCD fugitive dust control measures (See Section III). Once construction is complete, the Project would not result in soil erosion or loss of topsoil. Adherence to local and state requirements will ensure that any impacts are *less than significant*.

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

Less Than Significant Impact. As discussed in Impact a) above, the site is not at significant risk from earthquakes, ground shaking, liquefaction, or landslide and is otherwise considered geologically stable. Subsidence is typically related to over-extraction of groundwater from certain types of geologic formations where the water is partly responsible for supporting the ground surface. However, the City of Fresno is not recognized by the U.S. Geological Service as being in an area of subsidence.[10] Impacts are considered *less than significant*.

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

Less Than Significant Impact. Surface and near-surface soils throughout the city of Fresno consist of varying combinations of clays, silts, sands, gravels, and cobbles.

The Project site is underlain by Exeter sandy loam (NCRS 2023). This soil type is considered well drained with a low ability for water storage, which means they are unlikely

10 U.S. Geological Service. Areas of Land Subsidence in California. https://ca.water.usgs.gov/land_subsidence/california-subsidence-areas.html. Accessed December 2024.

to expand.[11] Any impacts are *less than significant.*

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

No Impact. Under the approved City of Fresno General Plan, all development within the City limits is required to install public sewage collection and disposal systems. The Project does not include the construction or replacement of septic tanks or alternative wastewater disposal systems. Any existing on-site septic tanks and systems will be abandoned according to county standards. The Project will be required to tie into existing sewer services (See Utilities section for more details). Therefore, there is *no impact.*

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

Less Than Significant Impact with Mitigation. There are no unique geological features on site or in the area. As discussed previously in this document, there are no known cultural or historical resources on or near the site. (See Section V. for more details). Mitigation Measure CUL-1 is included to reduce potential impacts to undiscovered resources. Therefore, there is a *less than significant impact with mitigation.*

Mitigation Measures

See CUL-1 in Section V.

11 USDA Natural Resources Conservation Service. Custom Soil Resource Report for Eastern Fresno Area, California.

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

The following analysis is based primarily on the Air Quality, Energy and Greenhouse Gas Emissions Technical Memorandum performed on behalf of the proposed Project by LSA Consulting, report dated December 24, 2024 (see Appendix A).

DISCUSSION

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

Less Than Significant Impact.

Construction Greenhouse Gas Emissions

Construction activities associated with the proposed Project would produce combustion emissions from various sources. During construction, GHGs would be emitted through the operation of construction equipment and from worker and builder

fossil-based fuels created GHGs such as CO_2, CH_4, and N_2O. Furthermore, CH_4 is emitted during the fueling of heavy equipment. Exhaust emissions from on-site construction activities would vary daily as construction activity levels change.

The SJVAPCD does not have an adopted threshold of significance for construction-related GHG emissions. However, lead agencies are encouraged to quantify and disclose GHG emissions that would occur during construction. Using CalEEMod, it is estimated that the total emissions associated with construction of the proposed Project would be approximately 1,562.8 metric tons (MT) of CO_2e. Construction GHG emissions were amortized over the life of the Project (assumed to be 30 years) and added to the operational emissions. When annualized over the life of the Project, amortized construction emissions would be approximately 52.1 MT CO_2e per year.

Operational Greenhouse Gas Emissions

Long-term GHG emissions are typically generated from mobile sources (e.g., vehicle and truck trips), area sources (e.g., maintenance activities and landscaping), indirect emissions from sources associated with energy consumption, waste sources (land filling and waste disposal), and water sources (water supply and conveyance, treatment, and distribution). Mobile-source GHG emissions would include project-generated vehicle trips to and from the Project. Area-source emissions would be associated with activities such as landscaping and maintenance on the Project site. Energy source emissions would be generated at off-site utility providers as a result of increased electricity demand generated by the Project. Waste source emissions generated by the proposed Project include energy generated by land filling and other methods of disposal related to transporting and managing Project generated waste. In addition, water source emissions associated with the proposed Project are generated by water supply and conveyance, water treatment, water distribution, and wastewater treatment.

GHG emissions for operation of the Project were calculated using CalEEMod. Based on the analysis results, summarized in Table 5, the proposed Project would result in emissions of approximately 2,018.7 MT CO2e per year. These estimated emissions are provided for informational purposes, and the significance of the proposed Project is further analyzed below.

Table 5: Greenhouse Gas Emissions[12]

Emission Type	Total CO2	CH4	N2O	CO2E
Mobile	1,684.7	0.1	0.1	1,716
Area	2.5	<0.1	<0.1	2.5
Energy	175.6	<0.1	<0.1	177
Water	6.1	0.3	0.3	14.7
Waste	16.1	1.6	0.0	56.4
Amortized Construction Emissions				52.1
Total Operational Emissions				**2,018.7**

Notes: Due to rounding, total may be marginally different from CalEEMod output.

CH4 = methane CO2E = carbon dioxide equivalent

Co2 = carbon dioxide N20 = nitrous oxide

Source: Compiled by LSA (2024).

As discussed above, the SJVAPCD has not established a numeric threshold for GHG emissions, and the City does not have a current GHG Reduction Plan. In the absence of any City or SJVAPCD specific guidelines or thresholds, this analysis evaluates the proposed Project for consistency with the BAAQMD Justification Report, which identifies project design elements as the applicable thresholds of significance. If a

12 *Air Quality, Energy and Greenhouse Gas Emissions Technical Memorandum for Residential Tract 6376*, LSA Consulting. Report dated December 24, 2024. Page 39.

project is designed and built to incorporate design elements related to natural gas, energy, VMT, and EVs, then it would contribute its portion of what is necessary to achieve California's long-term climate goals-its "fair share"-and an agency reviewing the project under CEQA can conclude that the project would not make a cumulatively considerable contribution to global climate change.

Per the significance thresholds described above, a less than significant GHG impact would occur if the Project were consistent with the identified design standards, as evaluated below.

Natural Gas Usage. A less than significant GHG impact would occur if the Project does not include natural gas appliances or natural gas plumbing. The proposed Project would not include natural gas. Therefore, the proposed Project would be consistent with this design element.

Energy Usage. Under this design criterion, the Project must not result in any wasteful, inefficient, or unnecessary energy usage as determined by the analysis required under CEQA Section 21100(b)(3) and Section 15126.2(b) of the *State CEQA Guidelines*. Energy use consumed by the proposed Project would be associated with electricity consumption associated with the Project. Energy consumption was estimated for the Project using default energy intensities by land use type in the CalEEMod output, which is included in Appendix A.

As shown in Table 5 above, the estimated potential increase in electricity demand associated with the operation of the proposed Project is 1,897,356878,579 kWh per year. Total electricity consumption in Fresno County in 2022 was 8,384,408,687 kWh. Therefore, operation of the proposed Project would increase the annual electricity consumption in Fresno County by approximately 0.1 percent.

In addition, the proposed Project would be constructed to current Title 24 standards, which would require energy-saving building features. As such, based on this analysis, as required under CEQA Section 21100(b)(3) and Section 15126.2(b) of the *State CEQA Guidelines*, the proposed Project would not result in the wasteful, inefficient, or unnecessary consumption of fuel or energy and would incorporate renewable energy and energy efficiency measures into the building design, equipment use, and

transportation. As such, the proposed Project would be consistent with this design element.

Vehicle Miles Traveled. As discussed above, development that meets a locally adopted SB 743 VMT target would be considered to have a less than significant GHG emissions impact from transportation sources. A project specific VMT analysis was conducted for the Project utilizing the VMT Calculator tool developed by the City of Fresno and the project was found to be less than the screening thresholds established by the City to evaluate project consistency with the City's SB 743 VMT significance thresholds. Therefore, the proposed Project would be consistent with this project design element.

Electric Vehicle Requirements. The final project design element that the proposed Project should include to ensure that it is achieving its "fair share" of GHG emission reductions is compliance with off-street EV requirements in the most recently adopted version of the CALGreen Code Tier 2 measures. The proposed Project would include an EV charging station for each home, consistent with CALGreen Tier 2 standards. Therefore, the proposed Project would be consistent with this design element.

The proposed Project would be consistent with the project design elements related to natural gas, energy, VMT, and EVs. Therefore, the proposed Project would be consistent with the GHG emission thresholds identified for this Project. As such, the proposed Project would have a *less than significant impact* on the environment.

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

Less Than Significant Impact. The proposed Project is further analyzed for consistency with the City of Fresno General Plan policies, the 2022 Scoping Plan, and Fresno COG's RTP/SCS.

City of Fresno General Plan

The City's General Plan, including the Resources Conservation and Resilience Element as well as land use policies, includes objectives and policies that work to achieve and maintain reductions in GHG emissions and all strategies that reduce the

causes of climate change. A consistency analysis with the applicable policies from the Resources Conservation and Resilience Element and other relevant General Plan policies and objectives is presented below.

The proposed Project would be consistent with the following policies:

RC-5-a: In cooperation with other jurisdictions and agencies in the San Joaquin Valley Air Basin, take timely, necessary, and the most cost-effective actions to achieve and maintain reductions in greenhouse gas emissions and all strategies that reduce the causes of climate change in order to limit and prevent the related potential determinant effects upon public health and welfare of present and future residents of the Fresno community.

RC-5-d: SCS and CAP Conformity Analysis. Ensure that the City includes analysis of a project's conformity to an adopted regional Sustainable Community Strategy or Alternative Planning Strategy (APS), an adopted Climate Action Plan (CAP), and any other applicable City and regional greenhouse gas reduction strategies in affect at the time of project review.

RC-5-e: Ensure Compliance. Ensure ongoing compliance with GHG emissions reduction plans and programs by requiring that air quality measures are incorporated into projects' design, conditions of approval and mitigation measures.

RC-5- g: Evaluate Impacts with Models. Continue to use computer models such as those used by the SJVAPCD to evaluate greenhouse gas impacts of plans and projects that require such review.

RC 7: Promote water conservation through standards, incentives and capital investments.

RC 7-h: Landscape Water Conservation Standards. Refine landscape water conservation standards that will apply to new development installed landscapes, buildingon the State Model Water Efficient Landscape Ordinance and other State regulations.

- Evaluate and apply, as appropriate, augmented xeriscape, "water-wie," and

"green gardening" practices to be implemented in public and private landscaping design and maintenance.

- Facilitate implementation of the State's Water Efficient Landscape Ordinance by developing alternative compliance measures that are easy to understand and observe.

RC 11: Strive to reduce the solid waste going to landfills to zero by 2035..

The proposed Project would construct a 203-unit single-family development in a vacant lot and would provide infill development to an already established neighborhood in the City. Thus, the Project would be consistent with land use policies and strategies established in the General Plan including:

UF 12: Locate roughly one-half of future residential development in infill area – defined as being within the City on December 31, 2012 – including the Downtown core area and surrounding neighborhoods, mixed-use centers and transit-oriented development along major BRT corridors, and other non-BRT corridor infill areas, and vacant land.

UF 12-a: BRT corridors – Design land uses and integrate development site plans along BRT corridors, with transit-oriented development that supports transit ridership and convenient pedestrian access to bus stops and BRT station stops.

RC 2-a:Link Land Use to Transportation – Promote mixed-use, higher density infill development in multi-modal corridors. Support land use patterns that make more efficient use of the transportation system and plan future transportation investments in areas of higher-intensity development. Discourage investment in infrastructure that would not meet these criteria.

In addition, the proposed Project would comply with the 2022 CALGreen Code building measures and Title 24 standards for solar and EVs. Thus, the proposed Project would incorporate the appropriate energy and water conservation standards, facilitate incentives for the incorporation of bicycle and pedestrian amenities, and would encourage the use of alternative modes of transportation.

The proposed Project would also provide complete streets for all internal roadway improvements, which would increase connectivity with the surrounding land uses and neighborhoods. Therefore, the proposed Project would also be consistent with the

applicable strategies under policy RC-5-c and policies related to energy conservation, land use planning, and transportation demand outlined in the General Plan such as MT 4, MT 4-c, MT 5, MT 6, MT 8, and MT 8-b. Moreover, the proposed Project would provide recycling canisters and would implement techniques for solid waste segregation, disposal, and reduction, consistent with the CalRecycle Waste Diversion and Recycling Mandate. Therefore, the proposed Project would be consistent with waste diversion and recycling strategies under RC 11-a.

As further discussed in the following section, the proposed Project would also be consistent with the goals outlined in the Fresno COG 2022 RTP/SCS and would not interfere with the Fresno COG's ability to achieve the region's GHG reductions. Therefore, the Project would also be consistent with policy RC-5-d. Furthermore, PG&E is the private utility that would supply the proposed Project's electricity. Future residents would have the option to join an energy savings program, which would help educate homeowners on green energy. Therefore, the proposed Project would be consistent with policy RC-5-f. The analysis presented is conducted with the latest CalEEMod version, consistent with policy RC-5-g.

Through consistency with supporting and implementing the General Plan objectives and policies, the proposed Project is consistent with and would not conflict with or obstruct the implementation of the City's General Plan.

2022 Scoping Plan

The following discussion evaluates the proposed project according to the goals of the 2022 Scoping Plan,[49] EO B-30-15, SB 32, and AB 197.

EO B-30-15 added the immediate target of reducing GHG emissions to 40 percent below 1990 levels by 2030. CARB released a second update to the Scoping Plan, the 2017 Scoping Plan, to reflect the 2030 target set by EO B-30-15 and codified by SB 32. SB 32 affirms the importance of addressing climate change by codifying into statute the GHG emissions reductions target of at least 40 percent below 1990 levels by 2030 contained in EO B-30-15. SB 32 builds on AB 32 and keeps California on the path toward achieving the State's 2050 objective of reducing emissions to 80 percent below 1990 levels. The companion bill to SB 32, AB 197, provides additional direction to the CARB related to the adoption of strategies to reduce GHG emissions. Additional

direction in AB 197 intended to provide easier public access to air emissions data that are collected by CARB was posted in December 2016.

In addition, the 2022 Scoping Plan assesses progress toward the statutory 2030 target, while laying out a path to achieving carbon neutrality no later than 2045. The 2022 Scoping Plan focuses on outcomes needed to achieve carbon neutrality by assessing paths for clean technology, energy deployment, natural and working lands, and others and is designed to meet the State's long-term climate objectives and support a range of economic, environmental, energy security, environmental justice, and public health priorities.

The 2022 Scoping Plan focuses on building clean energy production and distribution infrastructure for a carbon-neutral future, including transitioning existing energy production and transmission infrastructure to produce zero-carbon electricity and hydrogen, and utilizing biogas resulting from wildfire management or landfill and dairy operations, among other substitutes. The 2022 Scoping Plan states that in almost all sectors, electrification will play an important role. The 2022 Scoping Plan evaluates clean energy and technology options and the transition away from fossil fuels, including adding four times the solar and wind capacity by 2045 and about 1,700 times the amount of current hydrogen supply. As discussed in the 2022 Scoping Plan, EO N-79-20 requires that all new passenger vehicles sold in California will be zero-emission by 2035, and all other fleets will have transitioned to zero-emission as fully possible by 2045, which will reduce the percentage of fossil fuel combustion vehicles.

Energy efficient measures are intended to maximize energy efficiency building and appliance standards, pursue additional efficiency efforts including new technologies and new policy and implementation mechanisms, and pursue comparable investment in energy efficiency from all retail providers of electricity in California. In addition, these measures are designed to expand the use of green building practices to reduce the carbon footprint of California's new and existing inventory of buildings. As discussed in the Energy section of this document, the proposed Project would not result in the wasteful or inefficient use of energy. The proposed Project would be required to comply with the latest Title 24 standards of the CCR, established by the CEC, regarding energy conservation and green building standards. Therefore, the proposed project would comply with applicable energy measures.

Water conservation and efficiency measures are intended to continue efficiency programs and use cleaner energy sources to move and treat water. Increasing the efficiency of water transport and reducing water use would reduce GHG emissions. The Project would comply with the CALGreen Code, which includes a variety of different measures, including the reduction of wastewater and water use. In addition, the proposed Project would be required to comply with the California Model Water Efficient Landscape Ordinance. Therefore, the proposed Project would not conflict with any of the water conservation and efficiency measures.

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

Fresno COG's 2022 RTP/SCS

The Fresno COG RTP/SCS reflects transportation planning for Fresno County through 2046. The vision, goals, and policies in the 2022 RTP are intended to serve as the foundation for both short and long-term planning and guide implementation activities. The core vision in the 2022 RTP is to create a region of diverse, safe, resilient, and accessible transportation options that improve the quality of life for all residents by fostering sustainability, equity, a vibrant economy, clean air, and healthy communities. The 2022 RTP contains transportation projects to help more efficiently distribute population, housing, and employment growth, as well as forecast development that is generally consistent with regional-level general plan data. The actions in the 2022 RTP address all transportation modes (e.g., highways, local streets and roads, mass transportation, rail, bicycle, and aviation facilities and services) and consists of short and long-term activities that address regional transportation needs. While the actions are organized by the five key policy areas, many of them support multiple goals and policies. Some actions are intended to support the SCS and reduce GHG emissions directly, while others are focused on the RTP's broader goals. The 2022 RTP does

not require that local General Plans, Specific Plans, or zoning be consistent with the 2022 RTP, but provides incentives for consistency for governments and developers.

The proposed Project would not interfere with the Fresno COG's ability to achieve the region's GHG reductions. Furthermore, the proposed Project is not regionally significant per *State CEQA Guidelines* Section 15206, and it would not conflict with the 2022 RTP targets because those targets were established and are applicable on a regional level. While the proposed Project site would require rezoning for the proposed land use, the proposed Project would result in a baseline VMT well above the per-capita threshold established by the City to support the region achieving the State's GHG reductions included under SB 743. Based on the average number of residents per household in Fresno of 2.96, the proposed Project would result in an estimated population increase of approximately 601 residents, well within the estimated population growth of 647,980 residents in 2030 as included in the 2022 RTP. Therefore, it is anticipated that implementation of the proposed Project would not interfere with Fresno COG's ability to implement the regional strategies outlined in the 2022 RTP. The proposed Project would comply with existing State regulations adopted to achieve the overall GHG emissions reduction goals identified in the 2022 RTP and would be consistent with applicable State plans and programs designed to reduce GHG emissions.

Therefore, the proposed Project would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing GHG emissions.

The Project would not result in the emission of substantial GHG emissions. Additionally, the Project would not conflict with local or regional plans and policies for GHG emission reductions, nor with the State's GHG emissions reductions objectives embodied in the 2022 Scoping Plan.

Therefore, the proposed Project's incremental contribution to cumulative GHG emissions would not be cumulatively considerable. The impact would be considered *less than significant.*

Mitigation Measures:

None are required.

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
IX. HAZARDS AND HAZARDOUS MATERIAL – Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			X	
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?			X	
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?			X	

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?		X		
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?			X	
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?			X	
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?				X

DISCUSSION

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

Less Than Significant Impact. Construction of the Project would require the use and transport of hazardous materials, including fuels, oils, and other chemicals (e.g., paints, lead, adhesives, etc.) typically used during construction. It is likely that these hazardous materials and vehicles would be stored by the contractor(s) on-site during construction activities. Improper use and transportation of hazardous materials could result in accidental releases or spills, potentially posing health risks to workers, the public, and the environment. However, all materials used during construction would be contained, stored, and handled in compliance with applicable standards and regulations established by the Department of Toxic Substances Control (DTSC), the U.S. Environmental Protection Agency (EPA) and the Occupational Safety and Health Administration (OSHA), as regulated by the Fresno County Department of Public Health. In addition, as discussed previously, a Storm Water Pollution Prevention Plan (SWPPP) is required for the Project and shall include emergency procedures for incidental hazardous materials releases. The SWPPP also includes Best Management Practices which includes requirements for hazardous materials storage.

The operational phase of the proposed Project would occur after construction is completed and residents move in to occupy the structures on a day-to-day basis. Residential land uses do not typically routinely transport, use, or dispose of hazardous materials, or dispose of hazardous materials, or present a reasonably foreseeable release of hazardous materials, with the exception of common residential hazardous materials such as cleaners, paint, petroleum products, etc. The use of hazardous materials would mostly be confined to the Project construction period. Any impacts are *less than significant.*

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

Less Than Significant. The proposed Project includes the development of a 202-lot single-family residential development, including a 0.39-acre park and other associated improvements. As discussed in Impact a) above, the use of hazardous materials would be primarily confined to the Project construction period and those materials would be contained, stored, and handled in compliance with applicable standards and regulations. As such, there are *less than significant impacts* regarding the release of hazardous materials into the environment.

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

Less Than Significant Impact. Sequoia Elementary School is located approximately 0.6 miles southeast of the Project site, located at 1820 Armstrong Avenue. Sanger West High School is located approximately 0.8 miles southwest of the Project site, located at 1850 S. Fowler Avenue. There are no schools located within one-quarter mile of the proposed Project site. Any hazardous materials contained, stored, or handled on site would be in compliance with applicable standards and regulations established by the Department of Toxic Substances Control (DTSC), the U.S. Environmental Protection Agency (EPA) and the Occupational Safety and Health Administration (OSHA). The immediate area surrounding the Project site is primarily comprised of residential purposes. Any impacts would be *less than significant*.

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

Less Than Significant Impact with Mitigation Incorporation. The proposed Project site is not located on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 (Geotracker[13] and Envirostor[14] databases –

13 California State Water Resources Control Board, GeoTracker Database. https://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=Fresno. Accessed December 2024.

14 California Department of Toxic Substances Control, EnviroStor Database. https://www.envirostor.dtsc.ca.gov/public/map/. Accessed December 2024.

accessed in December 2024). However, a database search performed in the Phase I ESA on behalf of the Project (RMA GeoScience) found that fuel underground storage tanks (UST) are listed at 1099 and 1183 Armstrong Avenue (See Appendix D). There were no records of leaks, spills, or the UST being removed from the location. Additional testing was performed to assess the possible presence of contaminated soil, utilizing soil gas probes in the area in question (See Appendix E). Soil gas samples collected from the former UST locations revealed concentrations of freon 113, acetone, carbon disulfide, chloroform, carbon tetrachloride, PCE, 2-butanone, 4-methyl-2-pentanone, toluene, ethylbenzene, xylenes, and 1,2,4-trimethylbenzene to be present in soil gas. However, with the exception of PCE, the concentrations detected are all below their respective ESL. The concentration of PCE detected in SGP-2-5 was reported at 22 ug/m3. The Residential ESL for PCE is 15 ug/m3.

The residential ESL for PCE is extremely conservative and should not be confused with regulatory cleanup standards. The presence of PCE in excess of the ESL does not necessarily indicate that an adverse impact to human health or the environment has occurred, it simply indicates that an adverse risk does exist, and that additional investigation may be warranted.

Soil samples collected from within the upper 18 inches of soil along the northern and eastern property boundary contained concentrations of metals that are consistent with normal background levels in the area of the Site. Soil samples collected from the central, eastern, and western portions of the Site contained low levels of organochlorine pesticides, however, the concentrations detected were all below their respective residential ESLs. No detectable concentrations of organophosphorus pesticides, SVOCs, or herbicides were detected above the laboratory reporting limits in any of the samples submitted for analysis.

Mitigation Measure HAZ-1 includes additional soil gas sampling once over-excavation, site grading, and other earthwork activities have been completed to confirm the low-level detections of PCE do not pose a vapor intrusion threat to future residential units. With this mitigation implemented, any impacts would remain *less than significant.*

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

Less than Significant Impact. The Project site is located just outside the Precision Approach Zone for the Airport Influence Area (AIA) of Fresno-Yosemite International Airport,[15] which lies approximately 3.7 miles to the northwest.

As the Project is outside the AIA of the Fresno-Yosemite International Airport, impacts resulting from creating a safety hazard for potential residents are *less than significant*.

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

Less Than Significant. The City of Fresno maintains an Emergency Preparedness Office (EPO) function for its jurisdictional responsibility area and coordinates with Fresno County OES regarding disaster preparedness, response, and recovery activities. The site plan's three ingress and egress points onto S. Armstrong Avenue have been reviewed by Public Works Traffic Planning to ensure that the Project does not impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan. Thus, the Project would not impair the implementation of. Or physically interfere with, any adopted emergency response plan or emergency evacuation plans. *No impact* would occur.

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

No Impact. Implementation of the Project would not change the degree of exposure to wildfires because there are no wildlands in the Project vicinity, thus precluding the

15 Fresno County Airport Land Use Compatibility Plan, December 2018, Part Two. Exhibit D1, Fresno-Yosemite INTL. Airport Influence Area and Safety Zones. https://fresnocog.wpenginepowered.com/wp-content/uploads/2019/01/fresno-final-alucp-113018-r_part2.pdf. Accessed December 2024.

possibility of wildfires. Therefore, there is *no impact.*

Mitigation Measures:

The proposed project shall implement and incorporate the hazardous materials related mitigation measures as identified in the attached Project Specific Mitigation Monitoring Checklist dated April 24, 2025.

HAZ – 1 Additional soil gas sampling shall be performed near the former southeastern UST once over-excavation, site grading, and other earthwork activities have been completed to confirm the low-level detections of PCE do not pose a vapor intrusion threat to future residential dwellings. If PCE levels are above the California Department of Toxic Substances Control (DTSC) soil gas thresholds, sub-slab vapor barriers, or another construction method which will reduce PCE levels to less than DTSC soil gas threshold shall be implemented.

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
X. HYDROLOGY AND WATER QUALITY – Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?			X	
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?			X	
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surfaces, in a manner which would:			X	

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
i) Result in a substantial erosion or siltation on- or off-site;			X	
ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site:			X	
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or			X	
iv) impede or redirect flood flows?			X	
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?			X	
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?			X	

DISCUSSION

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

Less Than Significant Impact. The Project has the potential to impact water quality standards and/or waste discharge requirements during construction (temporary impacts) and operation. Impacts are discussed below.

Construction

Although the proposed Project site is relatively small in scale, grading, excavation and loading activities associated with construction activities could temporarily increase runoff, erosion, and sedimentation. Construction activities also could result in soil compaction and wind erosion effects that could adversely affect soils and reduce the revegetation potential at construction sites and staging areas.

Three general sources of potential short-term construction-related stormwater pollution associated with the proposed Project are: 1) the handling, storage, and disposal of construction materials containing pollutants; 2) the maintenance and operation of construction equipment; and 3) earth moving activities which, when not controlled, may generate soil erosion and transportation, via storm runoff or mechanical equipment.

Generally, routine safety precautions for handling and storing construction materials may effectively mitigate the potential pollution of stormwater by these materials. These same types of common sense, “good housekeeping” procedures can be extended to non-hazardous stormwater pollutants such as sawdust and other solid wastes.

Poorly maintained vehicles and heavy equipment leaking fuel, oil, antifreeze, or other fluids on the construction site are also common sources of stormwater pollution and soil contamination. In addition, grading activities can greatly increase erosion processes. Two general strategies are recommended to prevent construction silt from entering local storm drains. First, erosion control procedures should be implemented for those areas that must be exposed. Secondly, the area should be secured to control offsite migration of pollutants. These BMPs would be required in the Stormwater Pollution Prevention Plan (SWPPP) to be prepared prior to commencement of Project

construction. When properly designed and implemented, these “good-housekeeping” practices are expected to reduce short-term construction-related impacts to less than significant.

In accordance with the National Pollution Discharge Elimination System (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 Regional Water Quality Control Board (RWQCB) has deemed effective in controlling erosion, sedimentation, runoff during construction activities. The specific controls are subject to review and approval by the RWQCB and are an existing regulatory requirement.

Operation

The long-term operations of the proposed Project could result in long-term impacts to surface water quality from urban stormwater runoff. The proposed Project would result in new impervious areas associated with site improvements, including new asphalt, concrete and the proposed structures on site. Urban runoff typically contains oils, grease, fuel, antifreeze, byproducts of combustion (such as lead, cadmium, nickel, and other metals) and other household pollutants. Precipitation early in the rain season displaces these pollutants into storm water resulting in high pollutant concentrations in initial wet weather runoff. This initial runoff with peak pollutant levels can be referred to as the "first flush" of storm events.

The proposed Project would install storm water drainage facilities (e.g. storm drainage mechanisms and storm water pipes) that would be in compliance with the City of Fresno and Fresno Metropolitan Flood Control District (FMFCD) Design Standards.

In accordance with the City’s storm water management regulations and National Pollutant Discharge Elimination System (NPDES) Stormwater Program (General Stormwater Permit), BMPs would be implemented to reduce the amount of pollution in stormwater discharged from the Project site. The management of water quality through the requirement to obtain a General Stormwater Permit and implement appropriate BMPs would ensure that water quality does not degrade to levels that would violate water quality standards. These are existing regulatory requirements.

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, any impacts are *less than significant.*

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

Less Than Significant Impact. The proposed Project includes a 202-lot single-family residential development. Each home will be equipped with typical restroom facilities. The proposed Project consists of 202 dwelling units, and the average household size in the City of Fresno is 2.97,[16] therefore the Project will house approximately 600 people. As such, the proposed Project would result in estimated water demand of 118,800 gallons per day (600 people x 198 gallons/day[17] = 118,800 gallons/day).

Water service would be provided to the Project by the City of Fresno. Based on the assumptions in the City's Urban Water Management Plan (UWMP),[18] the Project would not negatively impact water supplies or otherwise deplete groundwater supplies. Moreover, the proposed Project is not anticipated to interfere with groundwater recharge efforts being implemented by the City. The City's UWMP contains a detailed evaluation of existing sources of water supply, anticipated future water demand, extensive conservation measures, and the development of new water supplies (recycled water, increased recharge, surface water treatment, etc.). Measures contained in the UWMP as well as the City's General Plan are intended to reduce demands on groundwater resources by augmenting supply and introducing

[16] U.S. Census Bureau. QuickFacts. Fresno City. 2017-2017. https://www.census.gov/quickfacts/fact/table/fresnocitycalifornia,fresnocountycalifornia/PST045222. Accessed December 2024.

[17] City of Fresno 2020 Urban Water Management Plan. July 2021. Pg. ES-4. https://www.fresno.gov/wp-content/uploads/2023/03/Fresno-2020-UWMP_Final_2021-07-21-1.pdf. Accessed December 2024.

[18] Ibid.

conservation measures and other mitigation strategies. As such, a *less than significant* impact to a groundwater management basin would occur.

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

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

Less Than Significant Impact. The Project site is comprised of single-family residences and vacant disturbed land. The site is surrounded by urban development and agriculture. The existing on-site single-family residences would be demolished and would be cleared of vegetation and leveled to accommodate construction. The Project requires a Soils Report (i.e., Geotechnical Investigation) prior to granting of a grading permit. Because the Project would disturb more than one acre of land, a National Pollution Discharge Eliminate System (NPDES) permit and preparation of a Stormwater Pollution Prevention Plan (SWPPP) would also be required prior to granting a grading permit. Preparation of the soils report as well as implementation of standard best management practices (e.g., silt fences, fiber rolls, rumble grate, etc.) which would be identified in the SWPPP would be effective in reducing erosion and siltation impacts on or off-site to less than significant levels. Therefore, impacts with regard to substantial erosion or siltation on or off-site are considered *less than significant.*

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

Less Than Significant Impact. Development of the Project site would result in the addition of impervious surfaces in the form of 202 residential buildings, internal driveways and roadways. This will result in an increase in storm water runoff as well as the potential for contaminated runoff to enter FMFCD drainage basins. The Project site is surrounded by existing storm drainage infrastructure. The proposed Project is designated and planned for urban development. Accordingly, infrastructure has considered this level of development in its capacity. Therefore, the Project will result in a *less than significant* impact regarding on- or off-site flooding.

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?

Less Than Significant Impact. Site runoff from precipitation currently either percolates into the ground where there are no impervious surfaces or drains into the City's stormwater system and eventually into drainage basins that serve the area. Site development will result in the addition of impervious surfaces in the form of additional foundations, buildings, streets, and other paved surfaces. This will result in an increase in storm water runoff from the site and will increase the potential for contaminated runoff to enter FMFCD drainage basins or for drainage basins to overflow and cause flooding. However, the proposed Project will be designed to FMFCD and City of Fresno standards to prevent drainage overflow and flooding and the potential for contaminated runoff. The Project site has been anticipated for residential urban use by the City of Fresno General Plan. As with all developments, existing policies and standards are required to be complied with, which are assessed during design and review of entitlements by the City and FMFCD to ensure that none of the water quality standards are violated and that waste discharge requirements are adhered to during construction and operation of the Project. The proposed Project will connect to the City of Fresno's existing storm-drain system and pay drainage fees pursuant to the Drainage Fee Ordinance. Impacts resulting from polluted runoff will be *less than significant*.

iv. Impede or redirect flood flows?

Less Than Significant Impact. The Project site is outside of any Special Flood Hazard Areas or Other Areas of Flood Hazard, FEMA Flood Map 06019C2135H, effective 2/18/2009. As discussed above in Impacts ii, the Project site is served with stormwater infrastructure that has been sized to accommodate urban development. The Project would not impede or redirect flood flows as it has been designed with on-storm drainage infrastructure that will connect with the City's system. The impact will be *less than significant*.

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

Less Than Significant Impact. The Project site is outside of any Special Flood Hazard Areas or Other Areas of Flood Hazard, FEMA Flood Map 06019C2135H, effective 2/18/2009. There are no bodies of water near the site that would create a potential risk of hazards from seiche, tsunami or mudflow. The Project will not conflict with any water quality control plans or sustainable groundwater management plan. As mentioned in Impact c) above, all new development within the City of Fresno Planning Area must conform to standards and plans detailed by the Fresno Metropolitan Flood Control District. By conforming to all standards and policies as outlined, any impacts will remain *less than significant.*

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

Less Than Significant Impact. The City of Fresno is part of the North Kings Groundwater Sustainability Agency (GSA) which is one of the seven GSA's within the Kings Groundwater Subbasin. The North Kings GSA submitted the Groundwater Sustainability Plan to the CA Department of Water Resources in January 2020. The City of Fresno relies on natural groundwater recharge, subsurface inflow, and intentional recharge to replenish groundwater. As the City of Fresno will provide water to the proposed Project (upon approval), and the City will be subject to the requirements of the GSA, the proposed Project does not conflict with any adopted water quality or sustainable groundwater management plan.

Potential stormwater flows would discharge to on-site stormwater infrastructure and be conveyed to FMFCD retention basins. No stormwater flows would directly discharge to the San Joaquin River thereby avoiding water quality impacts. Any impacts would be *less than significant.*

Mitigation Measures

None required.

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

DISCUSSION

a) Physically divide an established community?

Less Than Significant Impact. The proposed Project site is currently designated by the City of Fresno General Plan for Residential, Medium Density planned land use. The site is currently occupied by three single-family residences and vacant disturbed land. The site does not include an established community. The proposed Project land use designation allows for densities between 5 to 12 units per acre, intended to provide for single-family detached housing. The proposed Project would include 202 units on approximately 34.7 acres of land, for a density of approximately 6 dwelling units per acre. Pursuant to Fresno Municipal Code Section 15-303, fractions of one-half (0.5) or greater shall be rounded up to the nearest whole number and fractions of

less than one-half (0.5) shall be rounded down to the nearest whole number. Specific to residential density rounding, fractions only apply to minimum density, but not maximum density. In this case, 5.82 dwelling units per acre would be rounded up to six dwelling units per acre, which is consistent with the minimum density requirement per the Fresno General Plan. Within the Project vicinity, there are single-family residences, active agricultural land, and vacant land surrounding the proposed Project. The proposed residential use is allowed within this land use designation, after the approval of an annexation, Rezone, TTM and Planned Development Permit. The Project is not dividing an established community. The Project is not being built in a pre-existing community area and would not create any physical barrier between an established community. Any impacts are *less than significant.*

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

No Impact. The proposed Project is located in an area that is planned for residential and urban development by the City. The site is currently designated as Medium Density Residential by the City of Fresno General Plan and is currently zoned as AL - 20 (Limited Agriculture) by Fresno County. As part of the proposed Project, the site will be rezoned to RS-5 / UGM (Residential Single Family, Medium Density/Urban Growth Management.

The proposed development is planned for single-family residential uses. The Project proposes to rezone to change the property from AL-20 to RS-5, which increases the density allowed on the site. However, the site is adjacent to existing residential subdivisions to the north and east and will be consistent with nearby residential densities.

The proposed subdivision is a standard infill development being proposed in compliance with the City's planned land use designation within the City limits. Infill development contributes to environmental preservation by reducing agricultural land conversion, reduce costs to build and maintain infrastructure, and improving air quality by overall reducing travel distances and subsequent greenhouse gas emissions.

Further, through the entitlement process, the Project has been reviewed for compliance with applicable regulations inclusive of those adopted for the purpose of avoiding or mitigating environmental effects. Overall, the entitlement process would ensure that the proposed Project complies with the General Plan, FMC, and any other applicable policies and regulations. *Less than significant* impacts will occur.

Mitigation Measures

None are required.

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

DISCUSSION

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

No Impact. Mineral resources are concentrated along the San Joaquin River Corridor. The proposed Project is not located along the San Joaquin River Corridor, there are no known mineral resources in the proposed Project area, and none are identified in the City's General Plan near the Project site. Therefore, there is *no impact.*

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

No Impact. As discussed in Impact a) above, there are no known mineral resources identified in the City's General Plan in the proposed Project area. There is *no impact.*

Mitigation Measures

None are required.

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

An Acoustical Analysis was performed on behalf of the proposed Project by WJVA

Acoustics, Inc. (report date October 25, 2023, update July 12, 2024) and is the basis of analysis for the discussion below. The Acoustical Analysis is provided in Appendix F.

DISCUSSION

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

Less Than Significant Impact.

Short-term (Construction) Noise Impacts

Proposed Project construction related activities will involve temporary noise sources. Typical construction related equipment includes graders, trenchers, small tractors, and excavators. During the proposed Project construction, noise from construction related activities will contribute to the noise environment in the immediate vicinity. Activities involved in construction will generate maximum noise levels, as indicated in Table 6, ranging from 80 to 95 dBA at a distance of 50 feet.

Table 6: Typical Construction Equipment Noise Levels19

Equipment Description	Maximum Noise Level (Lmax) at 50 Feet
Backhoes	80
Compactor (ground)	80
Cranes	85
Dozers	85
Dump Trucks	84

[19] Federal Highway Administration. Roadway Construction Noise Model (January 2006).

Excavators	85
Flat Bed Trucks	84
Front-end Loaders	80
Graders	85
Impact Pile Drivers	95
Jackhammers	85
Pick-up Truck	55
Pneumatic Tools	85
Pumps	77
Rock Drills	85
Rollers	85
Scrapers	85
Tractors	84

The distinction between short-term construction noise impacts and long-term operational noise impacts is a typical one in both CEQA documents and local noise ordinances, which generally recognize the reality that short-term noise from construction is inevitable and cannot be mitigated beyond a certain level. Thus, local agencies frequently tolerate short-term noise at levels that they would not accept for permanent noise sources. A more severe approach would be impractical and might preclude the kind of construction activities that are to be expected from time to time in urban environments. Most residents of urban areas recognize this reality and expect to hear construction activities on occasion.

Construction activities would not occur between the hours of 10:00 PM and 7:00 AM, Monday through Saturday, and not at all on Sundays, in accordance with Fresno Municipal Code Section 10-109, which limits work hours “to between the hours of 7 AM and 10 PM on any day except Sunday.”

Long-term (Operational) Noise Impacts

The proposed Project includes future residential uses. The immediate vicinity consists of existing and planned residential uses, which produce noise levels that are likely similar to long-term noise levels produced by the proposed Project. Additionally, all surrounding properties are adjacent to collector and arterial streets, which increase the ambient noise of the Project site. The proposed Project is not projected to be a long-term noise source due to the Project being a use consistent with neighboring land uses.

Project Site Noise Exposure

The Project site is located on the west side of S. Armstrong Avenue, north of E. Church Avenue, in Fresno, California. The Project site is exposed to traffic noise associated with vehicles on S. Armstrong Avenue and train noise associated with train operations on the San Joaquin Valley Railroad (SJVR). The distance from center of the backyards of the closest proposed lots to the centerline of S. Armstrong Avenue is approximately 80 feet. The distance from the center of the backyards of the closest proposed lot to the SJVR line is approximately 70 feet (lot 76). Additionally, the backyards of the remaining lots along the south side of E. Erin Avenue would be located approximately 115 feet from the SJRV line.

*Traffic Noise Exposure***:** Noise exposure from traffic on S. Armstrong Avenue was calculated for existing and future (2046). From Table 7 it may be determined that the traffic noise levels predicted by the FHWA Model were 1.5 dB lower than those measured for the conditions observed at the time of the noise measurements for S. Armstrong Avenue. This is considered to be reasonable agreement with the model and therefore no adjustments to the model are necessary.

Table 7:
Comparison of Measured and Predicted (FHWA Model) Noise Levels for Tract 6376, Fresno

	S. Armstrong Avenue
Measurement Start Time	8:50 a.m.
Observed # Autos/Hr.	216
Observed # Medium Trucks/Hr.	0
Observed # Heavy Trucks/Hr.	0
Observed Speed (MPH)	40
Distance, ft. (from center of roadway)	40
L_{eq}, dBA (Measured)	61.1
L_{eq}, dBA (Predicted)	59.6
Difference between Predicted and Measured L_{eq}, dBA	**1.5**

Note: FHWA "soft" site assumed for calculations.
Source: WJV Acoustics, Inc.

Annual Average Daily Traffic (AADT) data for S. Armstrong Avenue in the Project vicinity was obtained from Fresno COG. Truck percentages and the day/night distribution of traffic were estimated by WJVA, based upon previous studies conducted in the Project vicinity since project-specific data were not available from government sources. A speed limit of 40 mph (as posted) was assumed for the roadway. Table 8 summarizes annual average traffic data used to model noise exposure within the Project site.

Table 8:
Traffic Noise Modeling Assumptions for Tract 6376, Fresno

	S. Armstrong Ave.	
	Existing	2046
Annual Avenue Daily Traffic (AADT)	1,929	2,304
Day/Night Split (%)	90/10	
Assumed Vehicle Speed (mph)	40	
% Medium Trucks (% AADT)	2	
% Heavy Trucks (% AADT)	1	

Sources: Fresno COG
WJV Acoustics, Inc.

Using data from Table 8, the FHWA Model, annual average traffic noise exposure was calculated for the closest proposed backyards from S. Armstrong Avenue. The calculated noise exposures for existing and future (2046) traffic conditions for the closest proposed setbacks to S. Armstrong Avenue were approximately 55 dB Ldn for existing traffic conditions and approximately 56 dB Ldn future (2046) traffic conditions.

Such noise exposure levels are below the City's 65 dB Ldn exterior noise level standard and further mitigation of traffic noise is therefore not required.

Railroad Noise Exposure: The San Joaquin Valley Railroad (SJVR) line is located approximately 70 feet from the backyard of lot 76. Additionally, the backyards of the remaining lots along the south side of E. Erin Avenue would be located approximately 115 feet from the SJRV line. The railroad consists of jointed rails with the top of the rails being approximately one foot above the grade of the project site.

Train engineers are required to sound warning horns when within approximately ¼ mile of a grade crossing. As the entire project site railroad frontage is located within ¼ mile of the S. Armstrong Avenue grade crossing, all lots adjacent to the SJRV line would be impacted by train warning horns.

According to data obtained from the U.S. Department of Transportation Federal Railroad Administration (FRA), trains along this portion of the railroad line do not exceed 25 mph in speed. According to the local trainmaster they typically pass by at speeds in the range of 10-20 mph. Additionally, according to both the FRA and the SJVR trainmaster, typical operations consist of two train movements per day along the line, typically one occurring during daytime hours and one occurring during nighttime hours. There is a grade crossing at South Armstrong Avenue where locomotive engineers are required to blow their warning horn.

WJVA observed one train movement on January 22, 2018 at a different project site located along the same section of SJVR railroad line, east of the Project site. A westbound freight train passby occurred at approximately 2:45 p.m. Noise levels were measured from two locations along the track using automated sound level meters. Both meters were located approximately 50 feet from the tracks. One meter was located approximately 500 feet west of the grade crossing, and noise levels of the train event were measured to 102.8 dB (SEL). The second meter was located approximately 1,300 feet from the grade crossing at South Temperance, and noise levels of the train event were measured to be 98.6 dB (SEL). The difference in noise levels is a result of varying distances from the grade crossing, where the engineer is required to sound their warning horn. WJVA also reviewed other noise measurements obtained along the SJVR to assess noise levels for parcels closer to grade crossings along the SJVR railroad line, and determined the average SEL at the closest lots

adjacent to the SJVR railroad line to be 105.8 dB (SEL).

Railroad noise exposure may be quantified in terms of the Ldn using the following formula:

Ldn =SEL+ 10 log Neq – 49.4

where,

SEL is the average SEL for a train pass-by, Neq is the equivalent number of pass-bys in a typical 24-hour period determined by adding 10 times the number of nighttime movements (10 p.m.-7 a.m.) to the actual number of daytime movements (7 a.m.-10 p.m.). 49.4 is a time constant equal to 10 times the log of the number of seconds in a day.

Using the above-described formula, railroad operations data (assuming one train event during daytime hours and one train event during nighttime hours) and noise measurement results, the railroad noise exposure within the backyards of the proposed lots closest to the SJVR line. Using the above-described train noise measurements and calculations, SJVR train noise was calculated to be as follows:

1. Lot 76: 68 dB Ldn
2. Lots along south side of E. Erin Avenue: 65 dB Ldn

These noise levels indicate that exterior noise levels along the lots closest to the SJVR railroad line exceed the City's exterior maximum noise level standard, and mitigation measures must be incorporated into Project design.

Based on the Acoustical Analysis' findings, Mitigation Measure NOI-1, which includes constructing a sound wall, and NOI-2, which requires air conditioning units in all residences to allow for windows to stay shut for indoor insulation shall be implemented which will reduce potential impacts to *less than significant with mitigation incorporation.*

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

Less Than Significant Impact. The dominant sources of man-made vibration are sonic booms, blasting, pile driving, pavement breaking, demolition, diesel

locomotives, and rail-car coupling. None of these activities are anticipated to occur with construction or operation of the proposed Project. Vibration from construction activities could be detected at the closest sensitive land uses, especially during movements by heavy equipment or loaded trucks and during some paving activities (if they were to occur). Typical vibration levels at distances of 100 feet and 300 feet are summarized by Table 9. These levels would not be expected to exceed any significant threshold levels for annoyance or damage, as provided above in Table 9.

Table 9: Typical Vibration Levels During Construction

Equipment	PPV (in/sec)	
	@100'	@300'
Bulldozer (Large)	0.011	0.006
Bulldozer (Small)	0.0004	0.00019
Loaded Truck	0.01	0.005
Jackhammer	0.005	0.002
Vibratory Roller	0.03	0.013
Caisson Drilling	0.01	0.006
Source: Caltrans		

After full Project build out, it is not expected that ongoing operational activities will result in any vibration impacts at nearby sensitive uses. There are no aspects of construction or daily operations that would create groundborne vibration. As such, any impacts would be *less than significant.*

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

Less Than Significant Impact. The closest airport or airstrip is the Fresno Yosemite International Airport, located approximately 3.7 miles northwest of the Project site. The site is outside of the Airport Land Use Compatibility Plan (ALUCP). The City of Fresno has created specific designations to prioritize development in the urban portions of the city. These "Urban Core" areas are used by the City of Fresno to identify areas that should be prioritized for development from the City of Fresno's perspective. The Handbook, in Figure 4G, includes provisions for developing safety criteria for urban areas which includes no limit for intensity or density. Using the City of Fresno's "Urban Core" areas, there is no limit for non-residential intensity in areas designated as Urban.

The proposed Project is outside the noise level contours identified in the ALUCP. In conclusion, the proposed Project would not expose people residing or working in the Project site to excessive noise levels associated with such airport facilities, and there would be *less than significant impact.*

As such, impacts will remain *less than significant.*

Mitigation Measures:

The proposed project shall implement and incorporate the noise related mitigation measures as identified in the attached Project Specific Mitigation Monitoring Checklist dated April 24, 2025.

NOI – 1 A sound wall shall be constructed along the entire project site frontage with the SJVR railroad line. In the vicinity of Lot 76, the wall shall be constructed to a minimum height of eight feet six inches (8'6") above project site grade, and the sound wall shall be constructed to a minimum height of seven (7) feet above project site grade along the remainder of the SJVR project site frontage. In order to be effective, the sound wall shall be turned inward (southward) for a minimum distance of twenty (20) feet along the east side of Lot 76. The locations and heights of the required sound walls are provided on Figure 1 of Appendix F. Suitable construction materials include concrete blocks, masonry, or stucco on both sides of a wood or steel stud wall.

NOI – 2 Mechanical ventilation or air conditioning shall be provided for all homes so that windows and doors can remain closed for sound insulation purposes.

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

DISCUSSION

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

Less Than Significant Impact. As of July of 2023, the population in Fresno is 545,716 people with an average household size of 2.97.[20] The Project will construct housing with 202 dwelling units, which will house approximately 600 persons. The

[20] U.S. Census Bureau. QuickFacts. Fresno City. 2017-2017. https://www.census.gov/quickfacts/fact/table/fresnocitycalifornia,fresnocountycalifornia/PST045222. Accessed December 2024.

City's General Plan encourages residential developments to meet the future population growth needs. This project accommodates this anticipated increase in City's population by providing 202 new residences for existing and future residents.

The Project site has a proposed designation of Medium Density Residential as per the City's General Plan and a proposed rezoning of RS-5 (Medium Density Residential). Upon approval, the Project will be consistent with both the General Plan and zoning ordinance. Therefore, the Project would not induce substantial unplanned population growth in an area, either directly or indirectly. Impacts would be *less than significant*.

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

Less Than Significant Impact. The Project site is occupied by three single-family residences and is surrounded primarily by residential development. As proposed, the Project will displace existing housing; however, the Project will provide 202 new homes to a community in need of additional housing in the area. There is *a less than significant impact.*

Mitigation Measures

None are required.

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

DISCUSSION

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

a) Fire protection?

Less Than Significant. The Project includes construction of a 202-lot single-family residential unit development, including a 0.39-acre park and other associated improvements.

The City of Fresno Fire Department (Fire Department) offers a full range of services including fire prevention, suppression, emergency medical care, hazardous materials, urban search and rescue response, as well as emergency preparedness planning and public education coordination within the Fresno City limit, in addition to having mutual aid agreements with the Fresno County Fire Protection District, and the City of Clovis Fire Departments.

The City of Fresno Fire Department operates its facilities under the guidance set by the National Fire Protection Association in NFPA 1710, the Standard for the Organization and Deployment of Fire Suppression Operations, Emergency Medical Operations, and Special Operation to the Public by Career Fire Departments. NFPA 1710 sets standards for turnout time, travel time, and total response time for fire and emergency medical incidents, as well as other standards for operation and fire service. The Fire Department has established the objectives set forth in NFPA 1710 as department objectives to ensure the public health, safety, and welfare.

The proposed Project would be served by the current Fire Station 15, which is located at 5630 E. Park Circle Drive, approximately 1.5 miles northwest of the Project site. After reviewing the Project, the Fire Department has determined that the Project can be adequately serviced by the current local Fire Facilities and Personnel,

consistent with National Fire Protection Association 1710 Objectives. Additionally, the Project will also be subject to Fire Facilities Fees.

Project implementation will result in *less than significant impacts.*

b) Police protection?

Less Than Significant. The Project includes construction of a 202-lot single-family residential unit development, including a 0.39-acre park and other associated improvements. The surrounding area is currently protected by the existing Southeast Police District, approximately 1.8 miles to the northwest at 224 S. Argyle Avenue. The Fresno Police Department provides a full range of police services including uniformed patrol response to calls for service, crime prevention, tactical crime and enforcement (including gang and violent crime suppression), and traffic enforcement/accident prevention. The proposed Project would also be protected by the Southeast Police District and would be subject to pay development impact fees to offset any potential impacts to police protection. Additionally, the Fresno Police Department reviewed the Project and had no comments. Any impacts are considered *less than significant.*

c) Schools?

Less Than Significant. According to the Sanger Unified School District, the schools that will serve the proposed project are Sequioa Elementary School, approximately 0.7 miles southeast of the Project, Washington Academic Middle School approximately 6.4 miles southeast of the Project, and Sanger West High School also approximately 0.7 miles southeast of the Project.

The proposed residential uses result in the generation of students, which would impact the District's student classroom capacity. Any future development occurring as a result of the proposed project may have an effect on the Sanger Unified School District's student housing capacity. The District, through local funding, is in a position to mitigate its shortage of classrooms to accommodate planned population growth for the foreseeable future. However, the District recognizes that the legislature, as a matter of law, has deemed under Government Code Section 65996 that all school facilities impacts are mitigated as a consequence of SB 50 Level 1, 2, and 3 developer fee legislative provisions. The developer will pay appropriate impact fees

at time of building permits. The proposed Project will not result in the need for construction of new school facilities. Impacts would be *less than significant*.

d) Parks?

Less Than Significant. The Project includes construction of a 202-lot single-family residential unit development, including a 0.39-acre park and other associated improvements.

The nearest park is South Sunnyside Granville Greenpark, approximately 0.7 miles southwest of the Project. The City of Fresno maintains a park goal to provide five acres of city park space per 1,000 residents. A 0.39-acre park is included in the proposed Project's design; however, Project review and approval process will ensure that all additional park related fees are paid by the applicant. These requirements will ensure that the proposed Project does not significantly affect park and recreation facilities. Impacts would be *less than significant.*

e) Other public facilities?

Less Than Significant. The Department of Public Utilities (DPU) has determined that adequate sanitary sewer and water services are available to serve the project site subject to compliance with the conditions submitted by the DPU for this project and implementation of the Fresno General Plan policies and the mitigation measures of the related Master Environmental Impact Report; and, the construction and installation of public facilities and infrastructure in accordance with Department of Public Works standards, specifications and policies.

For sanitary sewer service, these infrastructure improvements and facilities include typical requirements for the construction and extension of sanitary sewer mains and branches. The proposed Project will also be required to provide payment of sewer connection charges.

No significant adverse impacts are expected to occur as a result of the construction of any such facilities or improvements associated with the proposed Project. Impacts would be *less than significant.*

Mitigation Measures

None are required.

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

DISCUSSION

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

Less Than Significant. The Project includes construction of a 202-lot single-family residential unit development, including a 0.39-acre park and other associated improvements. The proposed Project may result in the physical deterioration of existing parks or recreational facilities.

The South Sunnyside Granville Greenpark lies approximately 0.7 miles to the southwest of the Project and a pocket park located at 5626 Burns Avenue is 1.4 miles to the southwest of the Project. There are also two schools with sports fields and other outdoor areas located within a mile of the Project; one to the southwest and one to the southeast.

Park and recreation fees, per the Quimby Act, are collected for new residential developments. The Project review and approval process will ensure that all park related fees are paid by the applicant. These requirements will ensure that the proposed Project does not significantly affect park and recreation facilities. Impacts would be *less than significant.*

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

Less Than Significant. As discussed above, the Project includes construction of a 202-lot single-family residential unit development, including a 0.39-acre park and other associated improvements. Through the standard City building process for the future park and payment of the required development fees, the Project will not significantly affect park and recreation facilities. The Project would not result in any new recreational, environmental impacts and are considered to be *less than significant.*

Mitigation Measures

None are required.

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

A Traffic Impact Analysis Report (TIA) was performed on behalf of the proposed Project by JLB Traffic Engineering, Inc., report date December 9, 2024 (See Appendix G). Additionally, the City of Fresno Urban Form VMT Calculator was utilized to address potential VMT impacts and is included as Appendix H. The following discussion is based

primarily on those two resources.

DISCUSSION

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

Less Than Significant with Mitigation. The proposed Project is located on the southwest corner of Armstrong Avenue and the San Joaquin Valley Railroad in the City of Fresno. The Project proposes to develop approximately 202 single-family residential units. The potential traffic impacts of the proposed Project were evaluated in accordance with the standards set forth by the Level of Service (LOS) policies of the City of Fresno and Fresno County.

The following intersections and study segments are included in the traffic analysis:

Intersections:

- Fowler Avenue / Hamilton Avenue
- Armstrong Avenue / Hamilton Avenue
- Temperance Avenue / Hamilton Avenue
- Armstrong Avenue / California Avenue
- Temperance Avenue / California Avenue (future intersection)
- Fowler Avenue / Church Avenue
- Armstrong Avenue / Church Avenue

Study Segments:
Armstrong Avenue between Geary Avenue and Church Avenue

Roadway Descriptions

Fowler Avenue is an existing north-south three-lane divided arterial in the vicinity of the proposed Project site. In this area, Fowler Avenue is a four-lane divided arterial between the State Route 180 Interchange and Kings Canyon Road, a two to three-lane arterial divided by a two-way left-turn lane between Kings Canyon Road and the San Joaquin Valley Railroad, a two to three-lane divided arterial between the San Joaquin Valley Railroad and Jensen Avenue and a two-lane undivided arterial

between Jensen Avenue and North Avenue. The Fresno General Plan Circulation Element designates Fowler Avenue as a four-lane divided arterial between State Route 180 and Kings Canyon Road, a two-lane arterial between Kings Canyon Road and Hamilton Avenue and Hamilton Avenue, a four-lane arterial between Hamilton Avenue and Jensen Avenue and a two-lane collector between Jensen Avenue and North Avenue.

Armstrong Avenue is an existing north-south three-lane undivided collector adjacent to the proposed Project. In this area, Armstrong Avenue is a three- to four-lane undivided collector between Kings Canyon Road and Hamilton Avenue, a three to four-lane collector divided by a two-way left-turn lane between Hamilton Avenue and Truman Avenue, a two-lane undivided collector between Truman Avenue and North Avenue. The Fresno General Plan Circulation Element designates Armstrong Avenue as a four-lane collector between Kings Canyon Road and Jensen Avenue and a two-lane collector between Jensen Avenue and North Avenue.

Temperance Avenue is an existing north-south two-lane undivided super arterial in the vicinity of the proposed Project. In this area, Temperance Avenue is a two-lane undivided super arterial between Kings Canyon Road and Butler Avenue, a four-lane divided super arterial between Butler Avenue and Hamilton Avenue and a two-lane undivided super arterial between Hamilton Avenue and North Avenue. The Fresno General Plan Circulation Element designates Temperance Avenue as a six-lane super arterial between Kings Canyon Road and Jensen Avenue and a four-lane super arterial between Jensen Avenue and North Avenue.

Hamilton Avenue is an existing east-west two-lane collector divided by a two-way left-turn lane in the vicinity of the proposed Project. In this area, Hamilton Avenue exists as a two-lane collector divided by a two-way left-turn lane between Fowler Avenue and Temperance Avenue. The Fresno General Plan Circulation Element designates Hamilton Avenue as a two-lane collector between Fowler Avenue and Temperance Avenue.

California Avenue is an existing east-west four-lane collector west of Fowler Avenue and east of Armstrong Avenue. Through the Project, California Avenue is proposed to

be designed as a modified collector which will include a single vehicle lane in each direction divided by a 16-foot wide raised median with landscaping and a curbside Class II or Class IV bikeways. In this area, California Avenue exists between Armstrong Avenue and approximately 100 feet west of Temperance Avenue. The Fresno General Plan Circulation Element designates California Avenue as a four-lane collector between Fowler Avenue and Temperance Avenue. However, the Fresno COG traffic forecasting and the LOS operations within this TIA support the proposed cross section with a maximum of one vehicular lane per direction. Based on information provided by City of Fresno staff, the easterly extension of California Avenue to Temperance Avenue will be constructed and operational by early 2026.

Church Avenue is an existing east-west two-lane undivided collector in the vicinity of the proposed Project site. In this area, Church Avenue is a four-lane collector divided by a two-way left-turn lane between Peach Avenue and Sunnyside Avenue, a three-lane divided collector between Sunnyside Avenue and Fowler Avenue, a two-lane undivided collector between Fowler Avenue and Temperance Avenue and a two-lane undivided roadway between Temperance Avenue and Leonard Avenue. The Fresno General Plan Circulation Element designates Church Avenue as a four-lane collector between Willow Avenue and Temperance Avenue and a two-lane local roadway between Temperance Avenue and Highland Avenue.

Study Scenarios

Existing Traffic Conditions: This scenario evaluates the Existing Traffic Conditions based on existing traffic volumes and roadway conditions from traffic counts and field surveys conducted in June, August and September of 2024. The traffic counts for the existing study intersections and segments are contained in Appendix G.

Existing plus Project Traffic Conditions: This scenario evaluates total traffic volumes and roadway conditions based on the Existing plus Project Traffic Conditions. The Existing plus Project traffic volumes were obtained by adding the Project Only Trips to the Existing Traffic Conditions. The Project Only Trips to the study facilities were developed based on existing travel patterns, the Project Select Zone, the surrounding roadway network, engineering judgment, data provided by the developer, knowledge of the study area, existing residential and commercial densities, and the Fresno

General Plan Circulation Element in the vicinity of the Project site. The Fresno COG Project Select Zone results are contained in Appendix G.

Near Term plus Project Traffic Conditions: This scenario evaluates total traffic volumes and roadway conditions based on the Near Term plus Project Traffic Conditions. The Near Term plus Project traffic volumes were obtained by adding the Near Term related trips to the Existing plus Project Traffic Conditions scenario.

Cumulative Year 2046 plus Project Traffic Conditions: This scenario evaluates total traffic volumes and roadways conditions based on the Cumulative Year 2046 plus Project Traffic Conditions. The Cumulative Year 2046 plus Project traffic volumes were obtained by using a combination of the Fresno COG activity-based model (ABM) (Base Year 2019 and Cumulative Year 2046) and existing traffic counts. Under this scenario, the increment method, as recommended by the Model Steering Committee was utilized to determine the Cumulative Year 2046 traffic volumes. The Fresno COG ABM results provided by Kittelson & Associates are contained in Appendix G.

Results Under Each Study Scenario

Existing Traffic Conditions

A search was conducted of the Statewide Integrated Traffic Records System (SWITRS) to obtain collision reports for the most recent five-year period. Based on a review of the collision reports, a total of twenty-three (23) collisions were reported within the influence zone of the study intersections. Based on the number of correctable collisions, changes to the existing traffic controls at any of these intersections as a result of collision activity is not recommended. At present, all study intersections and the study segments operate at an acceptable LOS.

Existing plus Project Traffic Conditions

The locations of the existing and proposed roadways and access points were analyzed. This review revealed that all access points are located at points that minimize traffic operational impacts to existing and future roadway networks. At buildout, the proposed Project is estimated to generate a maximum of 1,905 daily trips,

141 AM peak hour trips and 190 PM peak hour trips. Under this scenario, all study intersections and segments are projected to continue operating at an acceptable LOS.

Near Term plus Project Traffic Conditions

The total trip generation for the Near-Term Projects is 96,426 weekday daily trips, 6,883 weekday AM peak hour trips and 8,598 weekday PM peak hour trips. Under this scenario, the intersections of Temperance Avenue at Hamilton Avenue and Armstrong Avenue at Church Avenue are projected to exceed their LOS threshold during AM peak period. Accordingly, the following improvements (Mitigation Measure TRA-1) will be included with the Project:

Traffic signal pole(s), less signal mast arms, including all related pull boxes and conduit associated with said pole(s), as necessary for a future four-leg intersection at California Avenue and Armstrong Avenue.

These improvements will reduce LOS impacts to less than significant.

Cumulative Year 2046 plus Project Traffic Conditions

Under this scenario, the intersections of Temperance Avenue at Hamilton Avenue, Temperance Avenue at California Avenue and Armstrong Avenue at Church Avenue are projected to exceed their LOS threshold during one or both peak periods. As such, Mitigation Measure TRA-1 shall be implemented which will include improvements at the intersections of Temperance Avenue at Hamilton Avenue, Temperance Avenue and California Avenue and Armstrong Avenue at Church Avenue. These improvements will reduce LOS impacts to less than significant.

Active Transportation Plan

The Fresno Active Transportation Plan (ATP) is an extensive guide detailing the conception for active transportation in the City of Fresno that was adopted in December 2016. This ATP aims to improve safety, increase non-motorized trips, improve access and fill in gaps in networks for Fresno's pedestrians and bicyclists. In order to achieve these goals for active transportation, this ATP proposes a comprehensive network of citywide bikeways, trails and sidewalks. The recommended network would add 166 miles of Class I Bike Paths, 691 miles of Class II Bike Lanes, 69 miles of Class III Bike Routes, 21 miles of Class IV Separated Bikeways and 661 miles of sidewalks. This ATP also recommends bicycle detection at traffic signals,

destination signage, bicycle parking, showers and changing facilities and bikeway maintenance. This network will be constructed in conjunction with adjacent land developments, roadway maintenance and active transportation infrastructure projects using funds from different local, state and federal sources.

Bikeways

The Fresno ATP classifies bicycle facilities into the following types:

- Class I Bikeway (Bike Path) – Provides a completely separated right-of-way for exclusive use of bicycles and pedestrians with crossflow minimized.
- Class II Bikeway (Bike Lane) – Provides a striped lane for one-way bike travel on a street or highway.
- Class III Bikeway (Bike Route) – Provides a shared use with pedestrians or motor vehicle traffic, typically on lower volume roadways.
- Class IV Bikeways (Separated Bikeways) – Provides a protected lane for one-way bike travel (one-way cycle track) and protected lanes for two-way bike travel (two-way cycle track) on a street or highway.

Class II (Bike Lane) Bikeways exist in the vicinity of the Project site along portions of Fowler Avenue, Armstrong Avenue, Hamilton Avenue, California Avenue and Church Avenue. The Fresno ATP recommends that Class II Bikeways be implemented adjacent to and in the vicinity of the Project site. Adjacent to the Project site, a Class II Bikeway is planned along the west side of Armstrong Avenue. In the vicinity of the Project site, Class II Bikeways are planned on remaining stretches Fowler Avenue, Armstrong Avenue, Temperance Avenue, Hamilton Avenue, California Avenue and Church Avenue. In the vicinity of the Project site, a Class I Bikeway is planned on Temperance Avenue between SR 180 and North Avenue. Mitigation Measure TRA-2 is included to require that the Project construct a Class II Bikeway on its frontages to Armstrong Avenue and California Avenue, as required by the Fresno ATP.

Walkways

The Fresno ATP classifies pedestrian facilities into sidewalks and Class I Bike Paths. Pedestrian sidewalks exist in the vicinity of the Project site along portions of Fowler Avenue, Armstrong Avenue, Temperance Avenue, Hamilton Avenue, California

Avenue and Church Avenue. The Fresno ATP recommends that pedestrian sidewalks be implemented in the vicinity of the Project site along remaining stretches of Fowler Avenue, Armstrong Avenue, Temperance Avenue, Hamilton Avenue, California Avenue and Church Avenue. Therefore, Mitigation Measure TRA-2 is included to require the Project construct ADA compliant pedestrian sidewalks along internal streets connecting all uses to external sidewalks and along its frontages to Armstrong Avenue and California Avenue, in compliance with the Fresno ATP.

Transit

Fresno Area Express (FAX), is the transit operator in the City of Fresno. At present, there are two (2) FAX transit routes that operate in the vicinity of the proposed Project site, Routes 1 and 22. FAX Route 1, which runs on a portion of Kings Canyon Road, operates at 15-minute intervals on weekdays and weekends. The nearest stop on this route to the Project site is located along the north side of Kings Canyon Road approximately 750 feet east of Clovis Avenue. This route provides a direct connection to the River Park Shopping Center, Manchester Center, Fresno City College, Downtown Fresno, the Big Fresno Fair grounds and Sunnyside High School. FAX Route 22, which runs on Clovis Avenue, operates at 30minute intervals on weekdays and weekends. The nearest stop on this route to the Project site is located along the west side of Burgan Avenue approximately 100 feet north of Lyell Avenue and is only used during peak hours. This route provides a direct connection Roosevelt High, the Amtrak Station, Central Library, Downtown Transit Center, Downtown Fresno, Community Center, Talking Book Library, West Lan Shopping Center and Fig Garden Library. It is worth noting that retention of the existing and expansion of future transit routes is dependent on transit ridership demand and available funding.

In conclusion, upon implementation of Mitigation Measures TRA-1 and TRA-2, the proposed Project will not require any additional changes to existing transportation systems and will have less than significant impact on any plans, ordinances, or policies related to the effectiveness or performance of transit, pedestrian and bicycle facilities. The Project will comply with all applicable City development standards. Any impacts would be *less than significant with mitigation incorporation*.

b) Would the project conflict or be inconsistent with CEQA Guidelines section

15064.3, subdivision (b)?

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

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

CEQA Guidelines Section 15064.3(b)(4) states that "[a] lead agency has discretion to choose the most appropriate methodology to evaluate a project's vehicle miles traveled, including whether to express the change in absolute terms, per capita, per household or in any other measure. A lead agency may use models to estimate a project's vehicle miles traveled, and may revise those estimates to reflect professional judgment based on substantial evidence. Any assumptions used to estimate used to estimate vehicle miles traveled and any revision to model outputs should be documented and explained in the environmental document prepared for the project. The standard of adequacy in Section 15151 shall apply to the analysis described in this section."

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

The City of Fresno VMT Thresholds adopted a screening standard and criteria that can be used to screen out qualified projects that meet the adopted criteria from needing to prepare a detailed VMT analysis.

The City of Fresno VMT Thresholds Section 3.0 regarding Project Screening discusses a variety of projects that may be screened out of a VMT analysis including specific development and transportation projects. For development projects, conditions may exist that would presume that a development project has a less than significant impact. These may be size, location, proximity to transit, or trip-making potential. For transportation projects, the primary attribute to consider with transportation projects is the potential to increase vehicle travel, sometimes referred to as “induced travel.”

Trip generation rates for the proposed Project were obtained from the 11th Edition of the Trip Generation Manual published by the Institute of Transportation Engineers (ITE) (see Appendix G), the proposed Project will generate 1,905 Average Daily Trips (ADT), 141 AM peak hour trips and 190 PM peak hour trips.

One of the eligible screening criteria is whether a residential project is located within an area with low VMT, as designated in the screening map for residential uses (Figure 6) in the City of Fresno’s CEQA Guidelines for VMT Thresholds Technical Advisory. These low VMT areas were calculated using Fresno County as the region. The Fresno County average VMT per capita is 16.90. The City of Fresno’s Urban Form VMT Calculator was utilized on behalf of the Project and indicated that the Project had an adjusted VMT per capita of 14.00 (See Appendix H). This results in a *less than significant impact.*

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

Less Than Significant Impact. Access to and from the proposed Project site will be from four (4) access points along future California Avenue west of Armstrong Avenue, and 2 (two) along the west side of Armstrong Avenue at buildout. The Project proposes to construct California Avenue west of Armstrong Avenue within the Project

site for approximately 1,300 feet. The four (4) access points along California Avenue include two (2) access points located on either side of future California Avenue approximately 1,150 feet west of Armstrong Avenue and two (2) access point located on either side of future California Avenue approximately 550 feet west of Armstrong Avenue. All four (4) access points are proposed to have full access to California Avenue. The two (2) access points proposed along the west side of Armstrong Avenue are located approximately 330 feet north of California Avenue and approximately 600 feet south of California Avenue. Both of these access points are proposed to have full access to Armstrong Avenue. Furthermore, one (1) outlet on the south, one (1) outlet on the west and California Avenue on the west can all be connected to for more access in the future.

A review of the existing and proposed roadways and access points indicates that they are located at points that minimize traffic operational impacts to existing and future roadway networks. The Project will be designed to current standards and safety regulations. All intersections will be constructed to comply with the City and Caltrans regulations, and design and safety standards of Chapter 33 of the California Building Codes (CBC) and the guidelines of Title 24 in order to create safe and accessible roadways.

Vehicles exiting the subdivision will be provided with a clear view of the roadway without obstructions. Landscaping associated with the entry driveways could impede such views, if improperly installed. Specific circulation patterns and roadway designs will incorporate all applicable safety measures to ensure that hazardous design features or inadequate emergency access to the site or other areas surrounding the project area would not occur. Therefore, with the incorporated design features and all applicable rules and regulations, the Project will have a *less than significant impact.*

d) Result in inadequate emergency access?

Less Than Significant Impact. State and City Fire Codes establish standards by which emergency access may be determined. The proposed Project would have to provide adequate unobstructed space for fire trucks to turn around. The Fresno City Fire Department reviewed the proposed Project plans and determined access is

acceptable as proposed. The proposed project site would have adequate internal circulation capacity including entrance and exit routes to provide adequate unobstructed space for fire trucks and other emergency vehicles to gain access and to turn around. The proposed Project would not inhibit the ability of local roadways to continue to accommodate emergency response and evacuation activities. Impacts would be *less than significant*.

Mitigation Measures:

The proposed Project shall implement and incorporate the transportation related mitigation measures as identified in the attached Project Specific Mitigation Monitoring Checklist dated April 24, 2025.

TRA – 1: The proposed Project shall implement the following intersection improvements to reduce impacts to LOS:

- The developer shall install traffic signal pole(s) less signal mast arms including all related pull boxes and conduit associated with said pole(s), as necessary for a future four-leg intersection at California Avenue and Armstrong Avenue.

TRA – 2: The following measures shall be implemented to ensure compliance with the Fresno Active Transportation Plan:

- The Project shall construct a Class II Bikeway on its frontages to Armstrong Avenue and California Avenue.
- The Project shall construct ADA compliant pedestrian sidewalks along internal streets connecting all uses to external sidewalks and along its frontages to Armstrong Avenue and California Avenue.

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVIII. TRIBAL CULTURAL RESOURCES – Would the project:				

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in PRC section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in PRC section 5020.1(k), or,		X		

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivisionI) of PRC section 5024.1. In applying the criteria set forth in subdivisI (c) of PRC section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.			X	

DISCUSSION

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

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

Less Than Significant Impact with Mitigation. A Tribal Cultural Resource (TCR) is defined under Public Resources Code section 21074 as a site,

feature, place, cultural landscape that is geographically defined in terms of size and scope, sacred place, and object with cultural value to a California Native American tribe that are either included and that is listed or eligible for inclusion in the California Register of Historic Resources or in a local register of historical resources. Pursuant to Assembly Bill 52 (AB 52), the Table Mountain Rancheria Tribe and the Dumna Wo Wah were invited to consult under both AB 52. The City of Fresno mailed notices of the proposed Project to each of these tribes on April 15, 2022, which included the required 30-day time period for tribes to request consultation. Following the close of the 30-day comment period, City staff confirmed that no comments were received. Because the Tribes did not request consultation, because of compliance with California Health and Safety Code Section 7050.5 as discussed in Section V, and because of the implementation of CUL-1 which will protect any unknown resources, any impacts to TCR's are *less than significant.*

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.

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

Resources (PRC Section 21074(a)(1-2)). According to the most recent census data, California is home to 109 currently recognized Indian tribes. Tribes in California currently have nearly 100 separate reservations or Rancherias. Fresno County has a number of Rancherias such as Table Mountain Rancheria, Millerton Rancheria, Big Sandy Rancheria, Cold Springs Rancheria, and Squaw Valley Rancheria. These Rancherias are not located within the city limits.

Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See PRC Section 21083.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per PRC Section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that PRC Section 21082.3(c) contains provisions specific to confidentiality.

Native American tribes traditionally and culturally affiliated with the project area were invited to consult regarding the project based on a list of contacts provided by the Native American Heritage Commission (NAHC). This list includes tribes that requested notification pursuant to Assembly Bill 52 (AB 52). The City of Fresno mailed notices of the proposed project to each of these tribes on April 15, 2022, which included the required 30-day time period for tribes to request consultation, which ended on May 16, 2022. All tribes which were contacted declined consultation. Therefore, there is a *less than significant impact*.

Mitigation Measures

1. The proposed project shall implement and incorporate the tribal cultural resource related mitigation measures as identified in the attached Project Specific Mitigation Monitoring Checklist dated April 24, 2025.

CUL-1: If previously unknown resources are encountered before or during grading activities, construction shall stop in the immediate vicinity of the find and a qualified historical resources specialist shall be consulted to determine whether the resource requires further study. The qualified historical resources specialist shall make recommendations to the City on the measures that shall be implemented to protect the discovered resources, including but not limited to excavation of the finds and evaluation of the finds in accordance with Section 15064.5 of the CEQA Guidelines and the City's Historic Preservation Ordinance.

If the resources are determined to be unique historical resources as defined under Section 15064.5 of the CEQA Guidelines, measures shall be identified by the monitor and recommended to the Lead Agency. Appropriate measures for significant resources could include avoidance or capping, incorporation of the site in green space, parks, or open space, or data recovery excavations of the finds.

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

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

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?			X	
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?			X	

DISCUSSION

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

Less Than Significant Impact. The proposed Project will require construction of new infrastructure to connect to the existing utility infrastructure. This will include water, wastewater, and storm water drainage connections. Additionally, the Project will include connections for electric power, natural gas, and telecommunications facilities. The installation of this infrastructure will not require any major upsizing or other offsite construction activities that would cause a significant impact. The new infrastructure would be connected to the existing infrastructure that is adjacent to the Project site.

Impacts to storm drainage facilities have been previously discussed under the Hydrology and Water Quality section included within this analysis herein above. As described in Section VII, Geology and Soils, and in compliance with NPDES General Construction Permit requirements, the proposed Project would design and submit a site-specific SWPPP to minimize the discharge of wastewater during construction and a Water Quality Management Plan that includes best management practices (BMPs) for runoff control as required. Therefore, the proposed Project would not require new stormwater drainage facilities to manage stormwater runoff during construction or operation.

The proposed Project would be subject to the payment of any applicable connection charges and/or fees and extension of services in a manner that is compliant with the Department of Public Utilities standards, specifications, and policies.

Sanitary sewer and water service under City of Fresno jurisdiction, delivery is also subject to payment of applicable connection charges and/or fees; compliance with the Department of Public Utilities standards, specifications, and policies; the rules and regulations of the California Public Utilities Commission and California Health Services; and, implementation of the City-wide program for the completion of incremental expansions to facilities for planned water supply, treatment, and storage. Impacts would be *less than significant.*

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

Less Than Significant Impact. As discussed under the Section VII Hydrology and Water Quality section of this Initial Study, the Fresno General Plan recognizes regional water resource planning efforts, such as, the Kings Basin's Integrated Regional Water Management Plan, the Fresno-Area Regional Groundwater Management Plan, and City of Fresno Metropolitan Water Resource Management Plan and cites the findings of the City of Fresno 2020 UWMP. The purpose of these management plans is to provide safe, adequate, and dependable water supplies in order to adequately meet existing and future needs of the Kings Basin regions and the Fresno-Clovis metropolitan area in an economical manner; protect groundwater quality from further degradation and overdraft; and provide a plan of reasonably implementable measures and facilities. Through routing to the applicable

departments and agencies, the City has determined that adequate water supply exists to serve the proposed Project. Additionally, the applicant will be required to comply with all requirements of the City of Fresno Department of Public Utilities to reduce the Project's water impacts to *less than significant*.

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

Less Than Significant Impact. See Impact (b) above. The City of Fresno acts as the Regional Sewer Agency and is responsible for operating the Fresno/Clovis Regional Wastewater Reclamation Facility (RWRF) and the North Fresno Wastewater Treatment Facility (NFWTF). The Regional Facility provides wastewater treatment for a service area that includes most of the Cities of Fresno and Clovis, and some unincorporated areas of Fresno County. The City is currently evaluating upgrades and modifications to the existing Regional Facility that may result in a capacity rating increase of 15.0 MGD. The City of Clovis owns 9.3 MGD of wastewater treatment capacity at the Regional Facility, and the City of Fresno owns the remaining capacity.

The NFWTF was constructed in late 2006 to provide wastewater treatment service for residential and commercial development in the surrounding area of north Fresno. The permitted capacity of the NFWTF is 0.71 MGD, as an average monthly flow, and 1.07 MGD, as a maximum daily flow. The City's master plan for the NFWTF calls for ultimate expansion to an average monthly flow capacity of 1.07 MGD upon full development of the NFWRF service area.

The City of Fresno Department of Public Utilities has reviewed the Project and determined that sanitary sewer facilities are available to provide service to the site, subject to the required conditions of approval. The City will provide sewer connection. The conditions of approval include payment of the applicable sanitary sewer fees, which would eventually be used to provide funding for the improvements at the RWRF and NFWTF in order to expand. The proposed Project will not result in a determination by the wastewater treatment provider that it has inadequate capacity to serve the Project's projected demand in addition to the provider's existing

commitments. Impacts would be *less than significant.*

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

Less Than Significant Impact. The City of Fresno Department of Public Utilities, Solid Waste Division has reviewed the Project for compliance with any federal, State, and local management and reduction statutes and regulations related to solid waste. Solid waste disposed of in the City of Fresno is taken to Cedar Avenue Recycling and Transfer Station. Once the trash has been off-loaded at the transfer station, it is sorted, and non-recyclable solid waste is loaded onto large trucks and taken to the American Avenue Landfill located approximately six miles southwest of Kerman. American Avenue Landfill is owned and operated by Fresno County and began operations in 1992 for both public and commercial solid waste haulers. The American Avenue Landfill is a sanitary landfill, meaning that it is a disposal site for a nonhazardous solid waste spread in layers, compacted to the smallest practical volume, and covered by material applied at the end of each operating day.

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

In the operational phase, typical household refuse would be generated by residences. According to CalRecycle, residential units average 12.23 lbs.[21] of household refuse per day. The proposed 202 units would generate approximately 2,470.5 lbs. per day, or approximately 409 tons per year. The site is designated by the General Plan for residential uses and as such, site development has been accounted for in the City's infrastructure planning documents, including waste management. Additionally, the Project would be required to comply with the City's Resolution which would curb solid waste generation in keeping with the provisions of

[21] CalRecycle. Estimated Solid Waste Generation Rates. https://www2.calrecycle.ca.gov/wastecharacterization/general/rates. Accessed December 2024.

AB 939. The Project will comply with any statutes and regulations related to solid waste. Therefore, the proposed Project would not result in any waste related environmental impacts, and impacts would be *less than significant*.

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

Less Than Significant Impact. While there are no applicable federal regulations, the proposed Project would be required to comply with State and local statutes and regulations related to solid waste. Pursuant to the provisions of AB 939, the City is required to divert 50 percent of solid waste generated in its jurisdiction away from landfills. The Project will comply with any statutes and regulations related to solid waste. Impacts would be *less than significant*.

Mitigation Measures

None are required.

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

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?				X

Setting

There are no State Responsibility Areas (SRAs) within the vicinity of the Project site. The Project site is not categorized as a "Very High" Fire Hazard Severity Zone (FHSZ) by CalFire. Although this CEQA topic only applies to areas within an SRA or Very High FHSZ, out of an abundance of caution, these checklist questions are analyzed below.

DISCUSSION

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

No Impact. The City of Fresno does have an adopted Emergency Operations Plan (EOP); however the EOP does not designate evacuation routes, which may not be necessary since Fresno does not face any expected natural hazards from likely sources or locations.[22] The Project site will connect to an existing network of City streets. The Project site is located in an area with several alternative access roads allowing access in the event of an emergency. Access to the alternative access roads would be maintained throughout construction, and appropriate detours would be

e Fresno General Plan. Chapter 9: Noise and Safety. Page 9-40. https://www.fresno.gov/wp-content/uploads/2023/03/upload_temp_Consolidated-GP-10-13-2022_compressed.pdf. Accessed December 2024.

provided in the event of potential road closures. The City of Fresno Fire Department oversees emergency response and preparedness.

Therefore, no significant impacts related to the impairment of the implementation of or physical interference with an adopted emergency response plan or emergency evacuation plan would occur. The Project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. There is *no impact.*

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

Less Than Significant Impact. The risk of wildfire is related to a variety of parameters, including fuel loading (vegetation), fire weather (winds, temperatures, humidity levels and fuel moisture contents) and topography (degree of slope). Steep slopes contribute to fire hazard by intensifying the effects of wind and making fire suppression difficult. Fuels such as grass are highly flammable because they have a high surface area to mass ratio and require less heat to reach the ignition point. The Project site is located in an area that is predominately urban, which is not considered a significant risk for wildlife. There are minimal amounts of highly flammable fuels such as dry grass in the area. Therefore, in the unlikely event of a wildfire, the Project would not expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Impacts will be *less than significant.*

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

No Impact. The Project includes development of infrastructure (water, sewer, and storm drainage) required to support the proposed residential uses. The Project site is surrounded by existing and future urban development. The Project would not require the installation or maintenance of infrastructure that may exacerbate fire risk. However, the development will meet local and State development codes and regulations related to fire protection and prevention. There is ***no impact.***

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

No Impact. The proposed Project would require the installation of storm drainage infrastructure to ensure that storm waters properly drain from the Project site and do not result in downstream flooding or major drainage changes. A storm drainage plan would be designed and engineered to ensure the proper construction of storm drainage infrastructure to control runoff and prevent flooding, erosion, and sedimentation.

Upon development of the site, stormwater would flow to the existing storm drains in the adjacent roadways. Any further storm drain requirements will be processed by the Fresno Metropolitan Flood Control District and constructed per the District's standards. Additionally, the Project site is outside of any Special Flood Hazard Areas or Other Areas of Flood Hazard, FEMA Flood Map 06019C2135H, effective 2/18/2009. Further, because the site is essentially flat and located in an existing urbanized area of the City, downstream landslides would not occur.

Landslides include rockfalls, deep slope failure, and shallow slope failure. Factors such as the geological conditions, drainage, slope, vegetation, and others directly affect the potential for landslides. One of the most common causes of landslides is construction activity that is associated with road building (i.e., cut and fill). The Project site is relatively flat; therefore, the potential for a landslide in the Project site is essentially non-existent. There is ***no impact.***

Mitigation Measures

None are required.

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIX. MANDATORY FINDINGS OF SIGNIFICANCE				
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?			X	

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?			X	
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?		X		

DISCUSSION

a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of an endangered, rare, or threatened species, or eliminate important examples of the major periods of California history or prehistory?

Less than Significant Impact. The proposed Project site is developed with a single-family residence and highly disturbed vacant land that is regularly disked for weed control. The site includes the development of 202 residential units and the associated improvements. As evaluated in this IS/MND, the proposed Project would not substantially degrade the quality of the environment; substantially reduce the habitat of a fish or wildlife species; cause a fish or wildlife population to drop below self-sustaining levels; threaten to eliminate a plant or animal community; reduce the number or restrict the range of an endangered, rare, or threatened species; or eliminate important examples of the major periods of California history or prehistory. Mitigation measures have been included to lessen the significance of potential impacts. Similar mitigation measures would be expected of other projects in the surrounding area, most of which share similar cultural paleontological and biological resources. Consequently, the incremental effects of the proposed Project, after mitigation included in this Initial Study, would not contribute to an adverse cumulative impact on these resources. Therefore, the project would have a *less than significant impact.*

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

Less than Significant Impact. CEQA Guidelines Section 15064(h) states that a Lead Agency shall consider whether the cumulative impact of a project is significant and whether the effects of the project are cumulatively considerable. The assessment of the significance of the cumulative effects of a project must, therefore, be conducted in connection with the effects of past projects, other current projects, and probable future projects. Due to the nature of the Project and consistency with environmental policies, incremental contributions to impacts are considered less than cumulatively considerable. All Project-related impacts were determined to be either less than significant, or less than significant after mitigation. The proposed Project would not contribute substantially to adverse cumulative conditions or create any substantial indirect impacts (i.e., increase in population could lead to an increased need for housing, increase in traffic, air pollutants, etc.). Due to buildout of the area and existing land constraints, it is not anticipated that further unplanned substantial residential

development will occur in the area in the foreseeable future. As such, Project impacts are not considered to be cumulatively considerable given the lack of proposed new development in the area and the insignificance of Project-induced impacts. The impact is therefore *less than significant.*

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

Less than Significant Impact with Mitigation. The analyses of environmental issues contained in this Initial Study indicate that the Project is not expected to have substantial impact on human beings, either directly or indirectly. Project-specific mitigation measures have been incorporated as described in each specific impact area which will reduce all potentially significant impacts to *less than significant.*

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