

Exhibit K

E202410000353

CITY OF FRESNO
NOTICE OF INTENT TO ADOPT A
MITIGATED NEGATIVE DECLARATION

Filed with the
FRESNO COUNTY CLERK
2220 Tulare Street, Fresno, CA 93721

ENVIRONMENTAL ASSESSMENT FOR T-6468/P23-04061

APPLICANT:

Terance Frazier
Kearney & Crystal, LLC
2141 Tuolomne Street, Suite M

FILED
DEC 16 2024 TIME 9:19am

PROJECT LOCATION:

Located on the west side of South Crystal Avenue between West Hawes and West Orleans Avenues in the City and County of Fresno, California (See Exhibit A - Vicinity Map)

FRESNO COUNTY CLERK
By Cyan Edmisten DEPUTY
Cyan Edmisten

APN: 464-070-05 & portion of 464-070-09

Site Latitude: 36°43'37.2" N & Site Longitude: 119°49'55.2" W
Mount Diablo Base & Meridian, Township 14S, Range 20E, Section 7

The full Initial Study is on file in the Planning and Development Department, Fresno City Hall, 3rd Floor, Room 3043, 2600 Fresno Street, Fresno, CA 93721.

PROJECT DESCRIPTION:

Tentative Tract Map No. 6468 and Planned Development Permit Application No. P23-04061 were filed by Terance Frazier of Kearney & Crystal, LLC, and pertains to approximately 7.82 acres of property.

Tentative Tract Map No. 6468 proposes to subdivide approximately 7.82 acres of property into an 84-lot single-family residential development.

Planned Development Permit Application No. P23-04061 proposes to modify the RS-5 zone district development standards to allow for private streets and a reduction in the minimum lot size, width, depth, and setbacks.

The City of Fresno has prepared an Initial Study of the above-described project and proposes to adopt a Mitigated Negative Declaration.

Pursuant to the California Public Resources Code (PRC) §§ 21093 and 21094 and California Environmental Quality Act (CEQA) Guidelines §§ 15070 to 15075, 15150, and 15152, this project has been evaluated with respect to each item on the attached Appendix G/Initial Study Checklist to determine whether this project may cause any additional significant effect on the environment. After conducting a review of the adequacy of the Project Specific Mitigation Measure Checklist and CEQA Guidelines §§ 15151 and 15179(b), the Planning and Development Department, as lead agency, finds that no substantial changes have occurred and that no new information has become available.

The completed Appendix G/Initial Study Checklist, its associated narrative, technical studies and mitigation measures reflect applicable comments of responsible and trustee agencies and research and analyses conducted to examine the interrelationship between the proposed project and the physical environment. The information contained in the project application and its related environmental assessment application, responses to requests for comment, checklist, Initial Study narrative, and any attachments thereto, combine to form a record indicating that an Initial Study has been completed in compliance with the State CEQA Guidelines and the CEQA.

All new development activity and many non-physical projects contribute directly or indirectly toward cumulative impacts on the physical environment. It has been determined that the incremental effect contributed by this project toward cumulative impacts is not considered substantial or significant in itself and/or that cumulative impacts accruing from this project may be mitigated to less than significant with application of feasible mitigation measures.

With mitigation imposed under the Project Specific Mitigation Measure Checklist, there is no substantial evidence in the record that this project may have additional significant, direct, indirect or cumulative effects on the environment that are significant. The Planning and Development Department, as lead agency, finds that no substantial changes have occurred and that no new information has become available.

Based upon the evaluation guided by the Appendix G/Initial Study Checklist, it was determined that there are project specific foreseeable impacts which require project level mitigation measures.

The Initial Study has concluded that the proposed project will not result in any adverse effects, which fall within the "Mandatory Findings of Significance" contained in § 15065 of the State CEQA

Guidelines. The finding is, therefore, made that the proposed project will not have a significant adverse effect on the environment.

Public notice has been provided regarding staff's finding in the manner prescribed by § 15072 of the CEQA Guidelines and by § 21092 of the PRC Code (CEQA provisions).

Additional information on the proposed project, including the Project Specific Mitigation Measure Checklist, proposed environmental finding of a Mitigated Negative Declaration and the Initial Study may be obtained from the Planning and Development Department, Fresno City Hall, 2600 Fresno Street, 3rd Floor, Room 3043, Fresno, California 93721 3604. Please contact Rob Holt at (559) 621-8056 or via email at Robert.Holt@fresno.gov for more information.

ANY INTERESTED PERSON may comment on the proposed environmental finding. Comments must be in writing and must state (1) the commentor's name and address; (2) the commentor's interest in, or relationship to, the project; (3) the environmental determination being commented upon; and (4) the specific reason(s) why the proposed environmental determination should or should not be made. Any comments may be submitted at any time between the publication date of this notice and close of business on January 6, 2025. Please direct comments to Rob Holt, Supervising Planner, City of Fresno Planning and Development Department, City Hall, 2600 Fresno Street, Room 3043, Fresno, California, 93721-3604; or by email to Robert.Holt@fresno.gov.


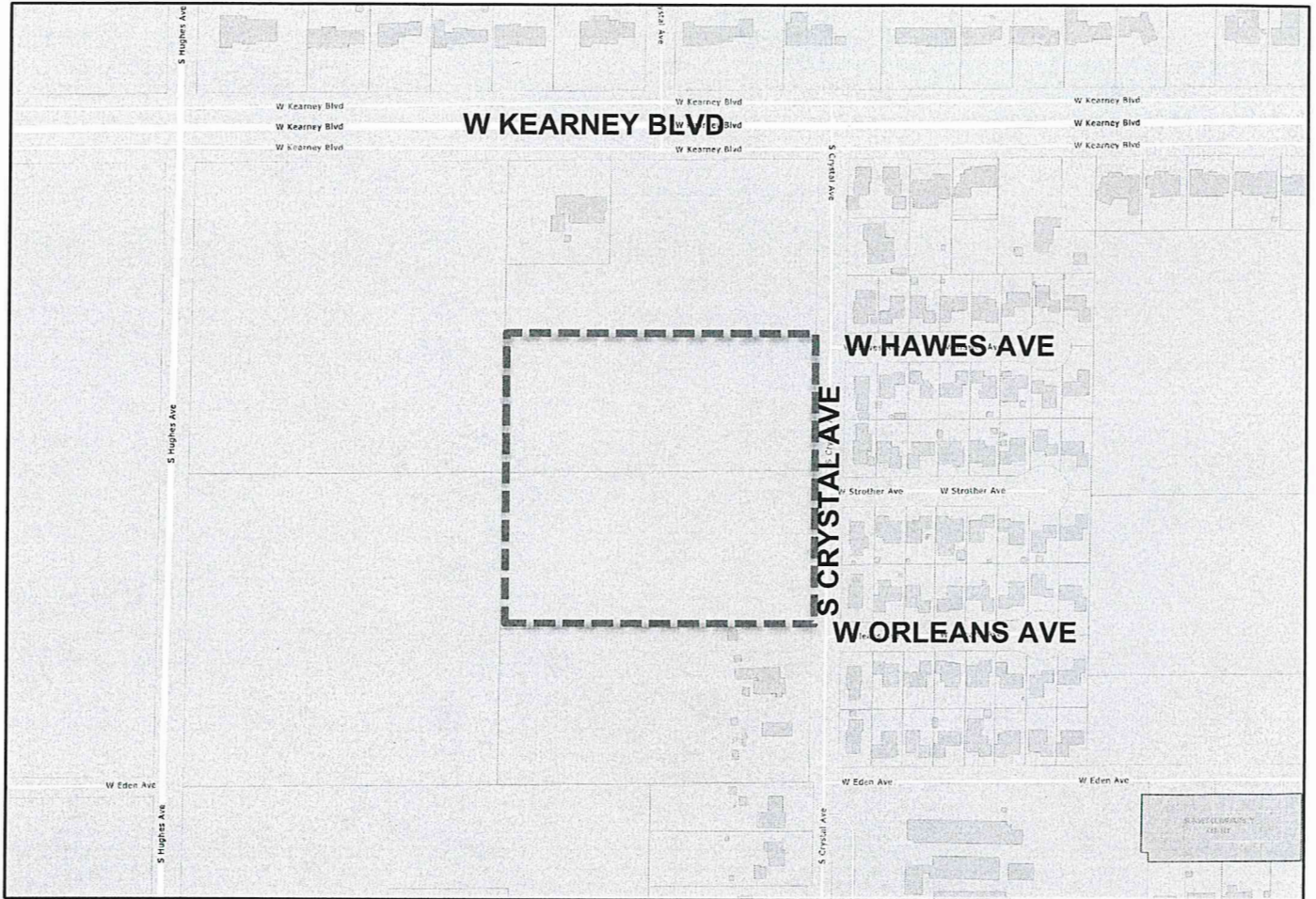
<p>INITIAL STUDY PREPARED BY:</p> <p>Rob Holt, Supervising Planner</p>	<p>SUBMITTED BY:</p>  <p>Rob Holt, Supervising Planner</p> <p>CITY OF FRESNO</p> <p>PLANNING AND DEVELOPMENT DEPARTMENT</p>
<p>DATE: 12/16/2024</p>	
<p>Attachments:</p> <p>Exhibit A – Vicinity Map</p>	

Exhibit A – Vicinity Map



Legend



Subject Property



APPENDIX G/INITIAL STUDY FOR A NEGATIVE DECLARATION

Environmental Checklist Form for: KEARNEY AND CRYSTAL SUBDIVISION (Application No. P23-03663)

1.	Project Title: Kearney and Crystal Subdivision at 1604 S Crystal Ave. (Application No. P23-03663)
2.	Lead Agency Name and Address: City of Fresno Current Planning Planning & Development 2600 Fresno Street Fresno, CA 93721
3.	Contact Person and Phone Number: Rob Holt, Supervising Planner City of Fresno Current Planning Planning & Development (559) 621-8056
4.	Project Location: 1604 South Crystal Avenue. (APN: 464-070-050 & 464-070-090)
5.	Project Sponsor's Name and Address: Terance Fraizer, on Behalf of Kearney and Crystal, LLC 2141 Tuolumne St. Suite M Fresno, CC 93721 (559) 349-6965
6.	General and Community Plan Land Use Designation: Residential, Medium Density (5.0-12 D.U./acre).
7.	Zoning: Residential Single-Family, Medium Density (RS-5).
8.	Description of Project: The Kearney and Crystal Subdivision (Tract 6468), Application No. P23-03663, was filed by the applicant, Terance Fraizer, on Behalf of Kearney and Crystal, LLC. The applicant is proposing a gated residential community in the southwest portion of Fresno

(city) that would include 84 residential units distributed amongst 74 two-story buildings, a 0.16-acre park, and 22 guest parking spaces on a 7.82-acre site (APN 464-070-050) (Figures 1 and 2). The project proposes to subdivide the existing parcel into 84 residential lots ranging in size from 1,866 square feet to 3,745 square feet and 3 open space lots for a total of 87 lots. The tentative tract map would be recorded in two phases, with 45 lots, including two open space lots and a gated entry, in Phase 1, and 42 lots, including one open space lot, in Phase 2.

The residential development would be constructed with 84 total single-family residential buildings (64 units will be Single-Family Dwelling, Detached uses and 20 units will be Single-Family Dwelling, Attached uses). A minimum of 64 of the 84 units will have recessed garages. The three-bedroom, two-story residences would reside on individual lots and would range in size from 1,244 square feet to 1,596 square feet. Private garages and off-street parking would provide 336 private parking spaces for homeowners (4 per unit), and an additional 22 guest parking spaces would be provided at the center of the community. Additionally, a looping roadway through the community would be sufficiently wide to allow for on-street parking.

Access to the community would be via a single entrance from South Crystal Avenue, across from West Strother Avenue. Internal access would be provided by a single looping road constructed for circulation within the project. A gated emergency access would be provided at the southern end of the eastern boundary of the project site, which would exit onto South Crystal Avenue (Figure 3). The project would also include frontage improvements along South Crystal Avenue to better support traffic through the area.

The project is requesting three modifications to City of Fresno (City) requirements: 1) modification to Standard P-56B to allow the right-of-way to be placed at the back of the curb with a 5' public utilities easement where the standard requires a sidewalk or buffer between the back of curb and property line with a 10' public utilities easement; 2) modification to Standard E-9A to allow no street lights on the west side of South Crystal Avenue where the standard requires street lights on alternating sides of the street; and 3) modification to Fresno Municipal Code Section 15.903 to allow reduced minimum lot sizes of 1,866 square feet where the section requires 2,500 square feet.

The 7.82-acre site is flat and currently undeveloped and vacant. Project construction would require approximately 400 cubic yards of material import (6,150 cubic yards of cut and 6,550 cubic yards of fill) and would result in site disturbance over the entire site. It is anticipated that the project would generate between 200 and 300 average daily vehicle trips. Construction is expected to last approximately 15 months. Water and sewer service would be provided by the City; gas and electric services would be provided by Pacific Gas and Electric Company (PG&E); and storm drain service would be provided by the Fresno Metropolitan Flood Control District.

The property is currently zoned RS-5 (Residential Single-Family, Medium Density), designated Medium Density per the City's General Plan, and is located within the Southwest Fresno Specific Plan area. The project would result in a gross residential

density of 10.7 du/ac, which is below the maximum permitted density of 12 du/ac for the RS-5 zone. The site would be fenced and gated such that only residents and approved visitors will be able to enter the site.

The project would not require the removal or demolition of any existing buildings or structures on the site.

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

	Planned Land Use	Existing Zoning	Existing Land Use
North	Multi	RS-2 and RS-5	Low density residential
East	Residential - Medium Low Density	RS-4	Medium low density residential
South	Multi	RS-5,	Rural residential
West	Multi	RS-4	Open space, Agriculture

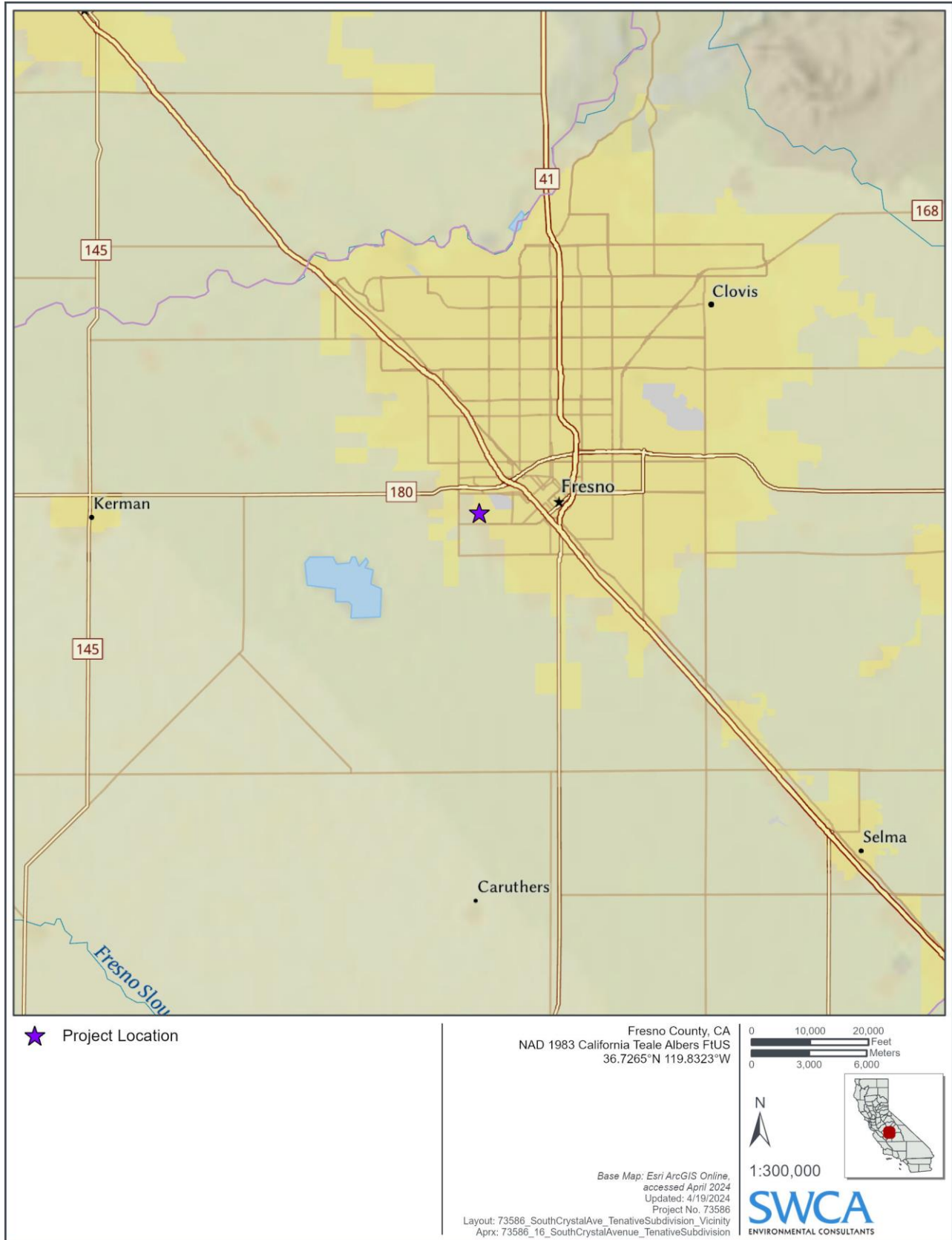


Figure 1. Project Vicinity Map.

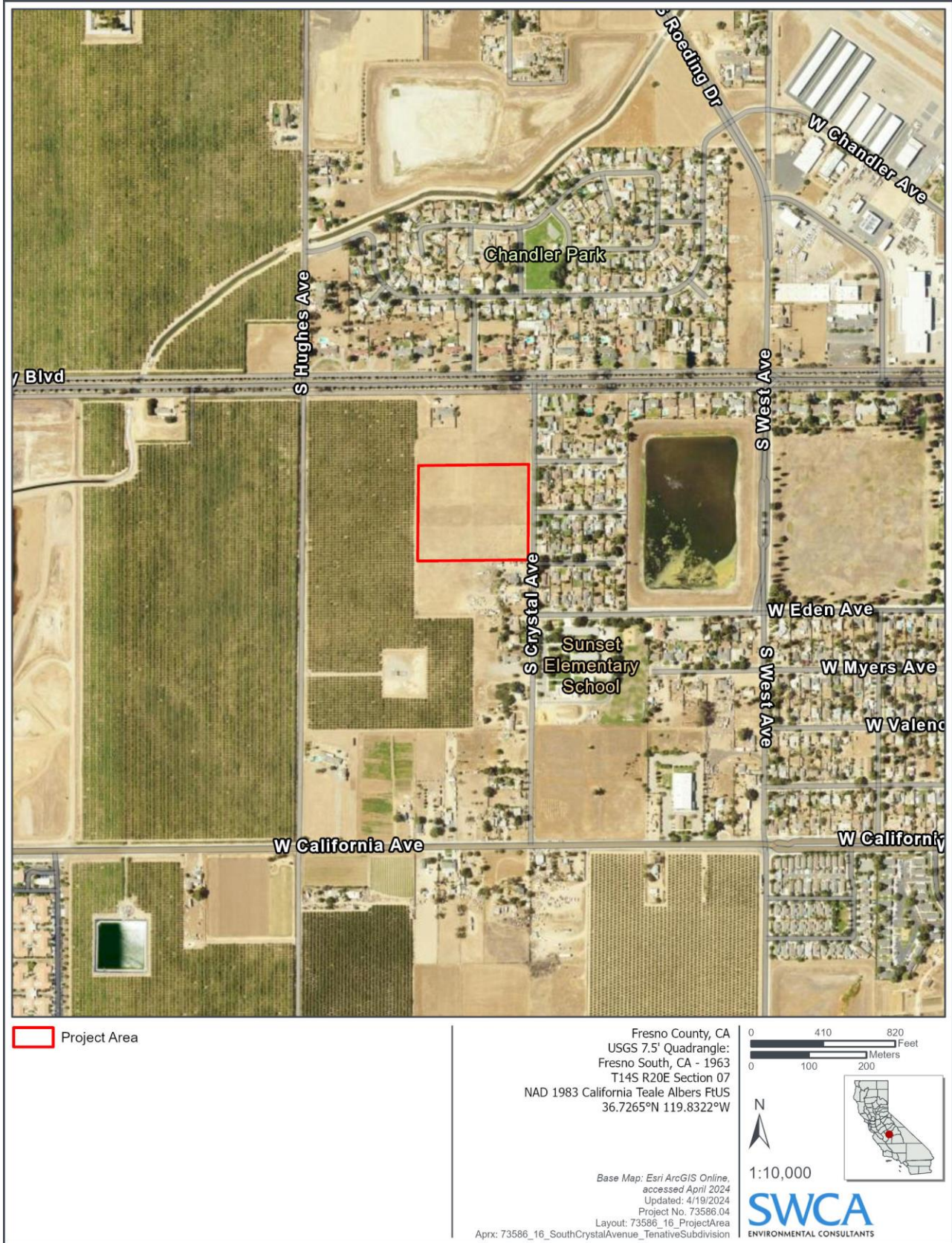


Figure 2. Project Location Map.

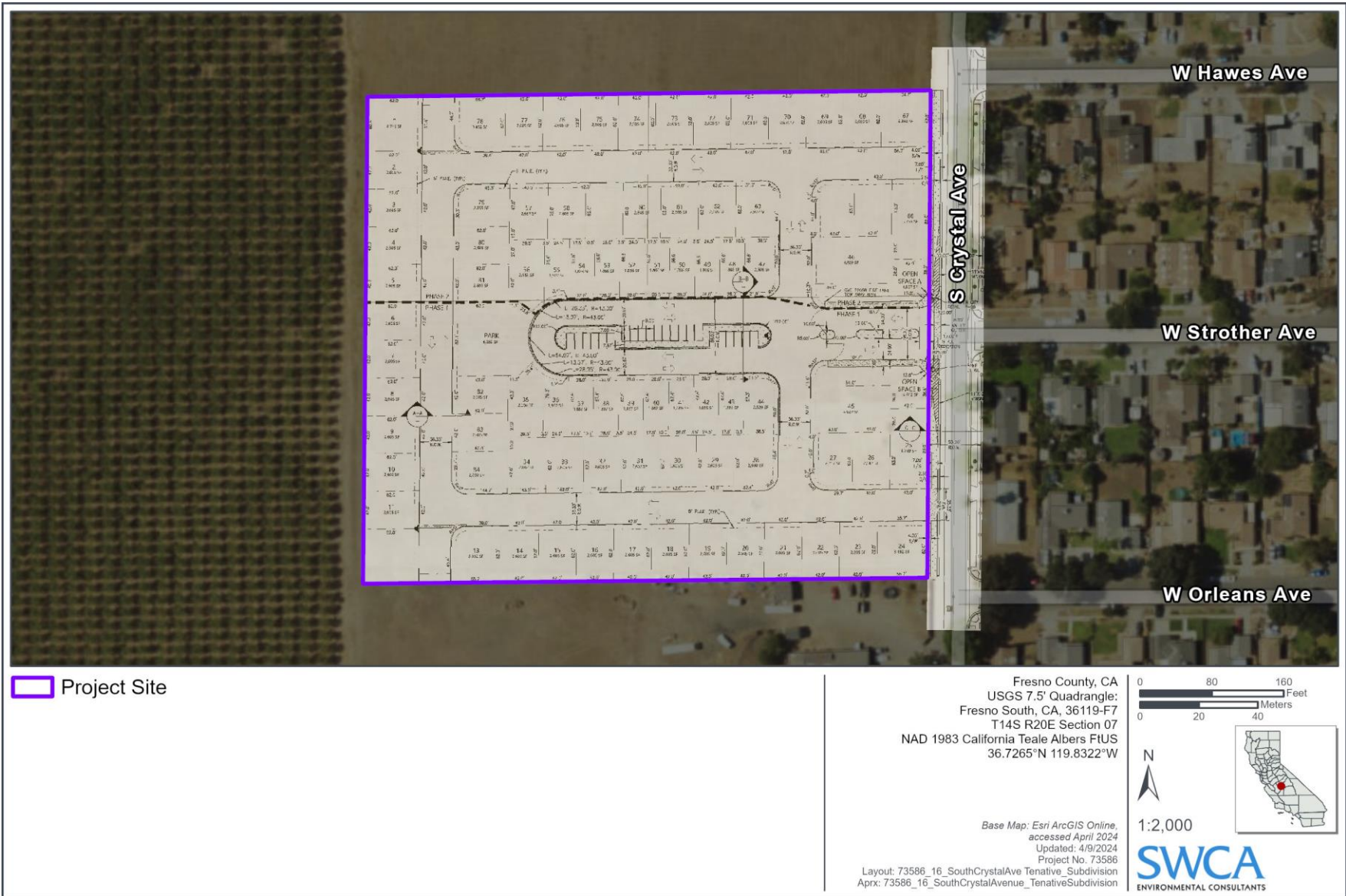


Figure 3. Proposed Subdivision

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

<input type="checkbox"/>	Aesthetics	<input type="checkbox"/>	Agriculture and Forestry Resources
<input checked="" type="checkbox"/>	Air Quality	<input checked="" type="checkbox"/>	Biological Resources
<input checked="" type="checkbox"/>	Cultural Resources	<input type="checkbox"/>	Energy
<input checked="" type="checkbox"/>	Geology/Soils	<input type="checkbox"/>	Greenhouse Gas Emissions
<input type="checkbox"/>	Hazards and Hazardous Materials	<input type="checkbox"/>	Hydrology/Water Quality
<input type="checkbox"/>	Land Use/Planning	<input type="checkbox"/>	Mineral Resources
<input type="checkbox"/>	Noise	<input type="checkbox"/>	Population/Housing
<input type="checkbox"/>	Public Services	<input type="checkbox"/>	Recreation
<input type="checkbox"/>	Transportation	<input checked="" type="checkbox"/>	Tribal Cultural Resources
<input type="checkbox"/>	Utilities/Service Systems	<input type="checkbox"/>	Wildfire
<input checked="" type="checkbox"/>	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.
<u>_X_</u>	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.
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12/16/2024

Rob Holt, Supervising Planner

Date

EVALUATION OF ENVIRONMENTAL IMPACTS:

1. For purposes of this Initial Study, the following answers have the corresponding meanings:
 - a. "No Impact" means the specific impact category does not apply to the project, or that the record sufficiently demonstrates that project specific factors or general standards applicable to the project will result in no impact for the threshold under consideration.
 - b. "Less Than Significant Impact" means there is an impact related to the threshold under consideration, but that impact is less than significant.
 - c. "Less Than Significant with Mitigation Incorporation" means there is a potentially significant impact related to the threshold under consideration, however, with the mitigation incorporated into the project, the impact is less than significant. For purposes of this Initial Study "mitigation incorporated into the project" means mitigation developed specifically for an individual project.
 - d. "Potentially Significant Impact" means there is substantial evidence that an effect may be significant related to the threshold under consideration.
2. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
3. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

4. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
5. "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from, "Earlier Analyses," as described in (6) below, may be cross-referenced).
6. Earlier analyses may be used where, pursuant to the tiering, Program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
 - a. Earlier Analysis Used. Identify and state where they are available for review.
 - b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in the GP 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 outcroppings, and historic buildings within a state scenic highway?				X
c) In non-urbanized areas, substantially degrade the existing visual character or quality public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?			X	
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?			X	

DISCUSSION

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

A scenic vista is a viewpoint that provides expansive views of a highly valued landscape for the public’s benefit. The City’s General Plan identifies six locations along the San Joaquin River bluffs as designated vista points from which views should be maintained. These scenic vistas provide distant views of features such as the San Joaquin River to the north and the foothills of the Sierra Nevada Mountains to the east.

The 7.82-acre project site is vacant, flat, and unpaved. The project site is not located within any of the scenic vista points identified in the City’s General Plan. Furthermore, the construction of the proposed project would not significantly affect or block a potentially scenic vista in the City. Therefore, there would be *no impact* on scenic vistas.

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

According to the California Department of Transportation (Caltrans) State Scenic Highway Mapping System,¹ there are no eligible or officially designated State Scenic Highways within the city. Fresno County has three eligible State Scenic Highways; the nearest eligible highways include a portion of State Route 180, located approximately 7 miles east of the city, and a portion of State Route 168, located approximately 5 miles east of city. The nearest officially designated State Scenic Highway is located more than 30 miles northeast of the city within Madera County. Since there are no eligible or officially designated State Scenic Highways in close proximity to the project site, implementation of the proposed project would not damage scenic resources within a designated state scenic highway; therefore, *no impact* would occur.

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?

The 7.82-acre project site is vacant, flat, unpaved, and in an urbanized area. There are existing overhead power lines on the west side of South Crystal Avenue, a two-lane paved road adjacent to the site. The east side of South Crystal Avenue is improved with a sidewalk. Surrounding land uses include agriculture, single-family residences, and vacant land. The proposed project would include the development of 84 residential units across 74 buildings, including 10 attached single family townhouses (20 units), and 64 unattached single-family homes (64 units). The residential buildings would be two stories tall and would have a maximum height of 25 feet. As part of project construction, the project site would include an internal roadway, guest parking, fencing, and security lighting. The project would also improve the street scape along the site frontage, including new sidewalks and streetlights along the west side of South Crystal Ave. The overhead utility line would be trenched along the project frontage consistent with Public Works Condition of Approval #7.

Although the proposed project would change the visual characteristics of the project site by developing residential buildings, parking, fencing, an internal roadway and lighting, the design of the additions would be consistent and compatible with the visual character of the project vicinity. There are several residential developments nearby, including single-family homes immediately adjacent to the south of the site, and across South Crystal Avenue to the east. Although the characteristics of the project site would change, the project would not substantially degrade the visual character or quality of the site and its surroundings and would be consistent with nearby land uses. Further, proposed improvements would be consistent with Objective D-4 of the City's Urban Form, Land Use, and Design Element, which aims to preserve and strengthen the

¹ California Department of Transportation (Caltrans). 2024. Scenic Highways: California State Scenic Highways. Available at: <https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways>. Accessed April 2024.

City's overall image through the creation of an attractive urban environment. Therefore, the proposed project would have a *less than significant* impact.

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

The project site is located in an urbanized area subject to preexisting exterior lighting from surrounding developments and existing street lighting. The proposed project would introduce new sources of light and glare to the area resonating from building windows, street and security lighting, and lighted signs. However, new sources of light and glare associated with the project would not be substantial in the context of existing lighting sources in the project vicinity. New outdoor lighting would be required to comply with Section 15-2015 (Outdoor Lighting and Illumination) of the City's Municipal Code, used for illumination purposes only, and pointed downward to avoid light spillover to surrounding land uses. In addition, daytime glare would not be substantial because highly reflective glass elements or building materials are typically not used in residential development. Compliance with California Building Code (Title 24, California Code of Regulations [CCR]) standards and the City's Municipal Code would ensure impacts would be *less than significant*.

Mitigation Measures

Mitigation measures are not required.

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>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:</p>				
<p>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?</p>				X
<p>b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?</p>				X
<p>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))?</p>				X
<p>d) Result in the loss of forest land or conversion of forest land to non-forest use?</p>				X

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

DISCUSSION

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

The project site is not classified as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. According to the California Department of Conservation Farmland Mapping and Monitoring Program (FMMP), the site is classified as Farmland of Local Importance.² The areas immediately to the west of the site are classified as Prime Farmland and Unique Farmland. However, implementation of the project would not affect access to or use of these areas. As the proposed project would not result in the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to a non-agricultural use, and *no impact* would occur.

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

The project site is designated as Residential Medium Density in the City’s General Plan and is located in the RS-5 zoning district. This land use allows for single-family residential developments between 5 to 12 units per acre.³ As the project site is 7.82 and proposes 84 units, the project would achieve a ratio of 10.74 units per acre. Further, the project site is not subject to a Williamson Act contract.⁴ The nearest Williamson Act contract parcel is located approximately 1.25 miles southwest of the project site. Therefore, development of the proposed project would not conflict with existing zoning for agricultural use or a Williamson Act contract, and *no impact* would occur.

² California Department of Conservation. 2022. California Important Farmland Finder. Available at: <https://maps.conservation.ca.gov/DLRP/CIFF/>. Accessed April 2024.

³ City of Fresno. 2016. Fresno Municipal Code Chapter 15: Citywide Development Code. Available at: https://library.municode.com/ca/fresno/codes/code_of_ordinances?nodid=MUCOFR_CH15CIDECOINRE. Accessed April 2024.

⁴ California Department of Conservation. 2022. California Williamson Act Enrollment Finder. Available at: <https://maps.conservation.ca.gov/dlrp/WilliamsonAct/>. Accessed April 2024.

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))?

The project site and surrounding area is not within forest land, timberland, or timberland production land use or zoning designations; therefore, the proposed project would not conflict with the zoning, or cause rezoning of, designated forest land, timberland, or timberland production, and *no impact* would occur.

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

Refer to *Impact Discussion II(c)*. The proposed project would not result in the loss of forestland or conversion of forestland to non-forest uses because the project site is not forested nor is it located near a forested area; therefore, *no impact* would occur.

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?

According to the California Department of Conservation FMMP, the site is classified as Farmland of Local Importance.⁵ Therefore, development of the proposed project could convert agricultural land to a non-agricultural use. However, the site is currently vacant, and is not actively being used for agriculture. Additionally, the project site is currently zoned for residential use (RS-5) by the City's General Plan. Further, the project site and surrounding area is not within forest land, timberland, or timberland production land use or zoning designations. Therefore, the project would not result in the conversion of farmland to non-agricultural uses or forestland to non-forest uses; therefore, impacts would be *less than significant*.

Mitigation Measures

Mitigation measures are not required.

⁵ California Department of Conservation. 2022. California Important Farmland Finder. Available at: <https://maps.conservation.ca.gov/DLRP/CIFF/>. Accessed April 2024.

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

DISCUSSION

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

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

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 (PM_{2.5}) standard to address the USEPA federal annual PM_{2.5} 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 below⁶. 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. As discussed below, emissions associated with the construction or operation of the proposed project would not result in the generation of criteria air pollutants that would exceed SJVAPCD thresholds of significance.

Table 1: SJVAPCD Project Construction and Operational Emission Thresholds

	CO	NOx	ROG	SOx	PM10	PM2.5
Annual Construction Emissions*	100.0	10.0	10.0	27.0	15.0	15.0
Annual Operational Emissions*	100.0	10.0	10.0	27.0	15.0	15.0

Source: SJVAPCD 2015.

*Emission units = Tons per Year (tpy)

CO = carbon monoxide NOx = nitrogen oxides PM2.5 = particulate matter less than 2.5 microns in size

PM10 = particulate matter less than 10 microns in size ROG = reactive organic gas

SOx = sulfur oxides

Construction and operational emissions for the proposed project were analyzed using the California Emissions Estimator Model version 2022.1.1.22 (CalEEMod). Model results for construction and operational emissions are shown in Table 2 and Table 3 respectively.

⁶ San Joaquin Valley Air Pollution Control District. 2015. Air Quality Thresholds of Significance – Criteria Pollutants. Available at: <http://www.valleyair.org/transportation/0714-GAMAQI-Criteria-Pollutant-Thresholds-of-Significance.pdf>. Accessed June 2024.

Table 2: Project Construction Emissions (Tons Per Year)

	CO	NO _x	ROG	SO _x	PM ₁₀	PM _{2.5}
Annual Construction Emissions*	2.92	2.65	0.87	0.01	0.65	0.34
SJVAPCD Thresholds	100.0	10.0	10.0	27.0	15.0	15.0
Exceed Threshold?	No	No	No	No	No	No

Source: SWCA Environmental Consultants 2024 (Appendix A).

*Emission units = Tons per Year (tpy)

CO = carbon monoxide

NO_x = nitrogen oxides

PM_{2.5} = particulate matter less than 2.5 microns in size

PM₁₀ = particulate matter less than 10 microns in size

ROG = reactive organic gas

SJVAPCD = San Joaquin Valley Air Pollution Control District

SO_x = sulfur oxides

Table 3: Project Operational Emissions (Tons per Year)

	ROG	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Area Source Emissions	0.83	0.05	1.22	<0.01	0.11	0.11
Energy Source Emissions	0.01	0.15	0.06	<0.01	0.01	0.01
Mobile Source Emissions	0.48	0.40	2.77	0.01	0.50	0.13
Total Project Operational Emissions*	1.32	0.60	4.05	0.01	0.63	0.25
SJVAPCD Thresholds	10.0	10.0	100.0	27.0	15.0	15.0
Exceed Threshold?	No	No	No	No	No	No

Source: SWCA Environmental Consultants 2024 (Appendix A).

*Emission units = Tons per Year (tpy)

CO = carbon monoxide

NO_x = nitrogen oxides

PM_{2.5} = particulate matter less than 2.5 microns in size

PM₁₀ = particulate matter less than 10 microns in size

ROG = reactive organic gas

SJVAPCD = San Joaquin Valley Air Pollution Control District

SO_x = sulfur oxides

The results shown in Tables 2 and 3 indicate that the proposed project's construction and operational emissions would not exceed SJVAPCD criteria pollutant thresholds. Therefore, the proposed project would not conflict with or obstruct implementation of SJVAPCD air quality plans and the impact would be *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?

CEQA defines a cumulative impact as two or more individual effects, which when considered together, are considerable or which compound or increase other environmental impacts. Therefore, if annual emissions of construction- or operational-related criteria air pollutants exceed any applicable threshold established by the SJVAPCD, the proposed project would result in a cumulatively significant impact. As discussed above, the proposed project's construction and operational emissions of criteria pollutants would not exceed SJVAPCD established significance thresholds for CO, NO_x, ROG, SO_x, PM₁₀, or PM_{2.5} emissions during project construction or operation. Therefore, the proposed project would not result in a cumulatively considerable contribution to a net increase of any criteria pollutant for which the project region is in non-attainment, and impacts would be *less than significant*.

c) Expose sensitive receptors to substantial pollutant concentrations?

Sensitive receptors are people that have an increased sensitivity to air pollution or environmental contaminants, such as the elderly, children, people with asthma or other respiratory illnesses, and others who are at a heightened risk of negative health outcomes due to exposure to air pollution. Some land uses are considered more sensitive to changes in air quality than others due to the population that occupies the uses and the activities involved. Sensitive receptor locations include schools, parks and playgrounds, day care centers, nursing homes, hospitals, and residences. There are single-family residences located directly to the south and to the east of the project site. In addition, Sunset Elementary School is located approximately 350 feet southeast of the project site. Therefore, the proposed project has the potential to expose nearby residents and students to short-term construction-related emissions, including diesel particulate matter (DPM) and fugitive dust.

As discussed in *Impact Discussion III(b)*, construction and operational emissions would not exceed SJVAPCD thresholds. However, due to the close proximity of sensitive receptors, compliance with the SJVAPCD Standard Regulation VIII Control Measures and Mitigation Measures AQ-1 through AQ-3 would be implemented to reduce the potential for a nuisance and sensitive receptor exposure to DPM and fugitive dust. Operation of the project would not introduce new sources of air emissions that could expose sensitive receptors to substantial pollutant concentrations. Therefore, potential impacts would be *less than significant with mitigation*.

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

During construction, the various diesel-powered vehicles and equipment in use on-site would create localized odors. These odors would be temporary and are not likely to be noticeable beyond the project site for extended periods of time. The potential for diesel odor impacts is therefore considered less than significant. Further, the project is not located in an area with known potential for naturally occurring asbestos (NOA).

As such, construction activities would not have the potential to expose workers or surrounding land uses to harmful levels of NOA.

In addition, the proposed uses that would be developed within the project site are not expected to produce any offensive odors that would result in frequent odor complaints because substantial odor-generating sources are not proposed. According to the SJVAPCD, substantial order-generating sources include the following:⁷

- Wastewater Treatment Facilities
- Sanitary Landfill
- Transfer Station
- Composting Facility
- Petroleum Refinery
- Asphalt Batch Plant
- Chemical Manufacturing
- Fiberglass Manufacturing
- Painting/Coating Operations
- Food Processing Facility
- Feed Lot/Dairy
- Rendering Plant

The proposed project does not include any of the above land uses. Therefore, the project would not create objectionable odors affecting a substantial number of people during project construction or operation. Therefore, potential impacts would be *less than significant*.

Mitigation Measures

AQ-1 Permit Requirements. Prior to ground disturbance and construction, the Construction Contractor shall obtain all required permits for dust control and the use of portable equipment, 50 horsepower or greater, from the San Joaquin Valley Air Pollution Control District. Upon application for construction permits, all required mitigation measures shall be shown on all applicable grading or construction plans and implemented during all applicable grading and construction activities.

AQ-2 Dust Control Measures. No person shall perform any construction, demolition, excavation, extraction, or other earth-moving activities unless measures are sufficiently implemented to limit visible dust emissions (VDE) to 20% opacity

⁷ San Joaquin Valley Air Pollution Control District. 2015. Guidance for Assessing and Mitigating Air Quality Impacts. Available at: <https://ww2.valleyair.org/media/g4nl3p0g/gamaqi.pdf>. Accessed April 2024.

and comply with the conditions for a stabilized surface area when applicable. In addition to the requirements of this rule, a person shall comply with all other applicable requirements of San Joaquin Valley Air Pollution Control District Regulation VIII. A person shall control the fugitive dust emissions to meet the following requirements:

1. Pre-Activity:
 - a. Pre-water site sufficient to limit VDE to 20% opacity, and
 - b. Phase work to reduce the amount of disturbed surface area at any one time.
2. During Active Operations:
 - a. Apply water or chemical/organic stabilizers/suppressants sufficient to limit VDE to 20% opacity; or
 - b. Construct and maintain wind barriers sufficient to limit VDE to 20% opacity. If utilizing wind barriers, control measure 2.a above shall also be implemented.
 - c. Apply water or chemical/organic stabilizers/suppressants to unpaved haul/access roads and unpaved vehicle/equipment traffic areas sufficient to limit VDE to 20% opacity and meet the conditions of a stabilized unpaved road surface.
3. Temporary Stabilization During Periods of Inactivity:
 - a. Restrict vehicular access to the area; and
 - b. Apply water or chemical/organic stabilizers/suppressants, sufficient to comply with the conditions of a stabilized surface. If an area having 0.5 acre or more of disturbed surface area remains unused for 7 or more days, the area must comply with the conditions for a stabilized surface area as defined in Section 3.58 of Rule 8011.

AQ-3 Construction Emissions. The project shall utilize clean off-road construction equipment, including the latest tier equipment, where feasible.

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

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

DISCUSSION

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

The project site is located in an urbanized area and is currently undeveloped and vacant, with previous agricultural activity. SWCA Environmental Consultants (SWCA) conducted a field assessment of biological resources within the proposed project site and surrounding area on May 15, 2024. Habitat on the project site is wild oat grassland dominated by wild oats (*Avena fatua*) and black mustard (*Brassica nigra*). Ruderal landcover is present along the shoulder of South Crystal Avenue. Small mammal burrows and brush rabbits (*Sylvilagus bachmani*) were observed within the grassland. Avian species observed during the survey included Brewer’s blackbird (*Euphagus cyanocephalus*) and northern mockingbird (*Mimus polyglottos*).

Short-term construction activities would have the potential to result in direct (e.g., take) or indirect (e.g., light pollution, noise pollution, habitat loss, etc.) impacts to special-status plant and animal species if present within the project area during project construction.

Special-Status Plants

Based on a nine-quadrangle query of the California Department of Fish and Wildlife (CDFW) California Natural Diversity Database (CNDDDB), the following special-status plant species have been previously documented in the project vicinity:

- Succulent owl’s-clover (*Castilleja campestris* var. *succulenta*) is a California Rare Plant Rank (CRPR) 1B.2 species that typically occurs in vernal pool and wetland areas.

- California jewelflower (*Caulanthus californicus*) is a CRPR 1B.1 species that typically occurs in chenopod scrub, pinion and juniper woodlands, and valley and foothill grasslands.
- Hoover's eriastrum (*Eriastrum hooveri*) is a CRPR 4.2 species that typically occurs in chenopod scrub, pinyon and juniper woodland, and valley and foothill grasslands.
- California satintail (*Imperata brevifolia*) is a CRPR 2B.1 species that typically occurs in chaparral, coastal scrub, Mojavean desert scrub, meadows, and riparian scrub habitat.
- Alkali-sink goldfields (*Lasthenia chrysantha*) is a CRPR 1B.1 species that typically occurs in vernal pool habitats.
- Lesser saltscale (*Atriplex miuscula*) is a CRPR 1B.1 species that typically occurs in chenopod scrub, playas, and valley and foothill grassland habitats.
- Sanford's arrowhead (*Sagittaria sanfordii*) is a CRPR 1B.2 species that typically occurs in marsh and swamp habitats.
- San Joaquin Valley Orcutt grass (*Orcuttia inaequalis*) is a CRPR 1B.1 species that typically occurs in vernal pool and wetland habitats.
- Hairy Orcutt grass (*Orcuttia pilosa*) is a CRPR 1B.1 species that typically occurs in vernal pool and wetland habitats.
- Greene's tuctoria (*Tuctoria greenei*) is a CRPR 1B.1 species that typically occurs in vernal pool and wetland habitats.

The project area consists entirely of ruderal/disturbed vegetation and does not support suitable habitat for the special-status plant species listed above. In addition, the project site has historically been subject to frequent disturbance (agriculture), which further reduces the potential for special-status plant species to occur within the project area. Based on the lack of suitable habitat and frequent human and vehicle disturbance, special-status plant species are not expected to occur within the project area; therefore, the project would not result in adverse effects to special-status plant species and impacts would be *less than significant*.

Special-Status Animals

Based on a nine-quadrangle query of the CDFW CNDDDB, the following special-status animal species have been previously documented in the project vicinity:

- San Joaquin kit fox (*Vulpes macrotis mutica*) is a federally endangered and state threatened species that typically occurs in chenopod scrub and valley and foothill grasslands.
- Fresno kangaroo rat (*Dipodomys nitratooides exilis*) is a federally and state endangered species that typically occurs in chenopod scrub habitat.
- California tiger salamander – Central California Distinct Population Segment (DPS) (*Ambystoma californiense* pop. 1) is a federally and state threatened

species that typically occurs in cismontane woodland, meadow and seep, riparian woodland, valley and foothill grassland, vernal pool, and wetland habitats.

- Crotch bumble bee (*Bombus crotchii*) is a state candidate endangered species that typically occurs in grassland habitats.
- Valley elderberry longhorn beetle (*Desmocerus californicus dimorphus*) is a federally threatened species that typically occurs in chenopod scrub habitat.
- Vernal pool fairy shrimp (*Branchinecta lynchi*) is a federally threatened species that typically occurs in valley and foothill grassland, vernal pool, and wetland habitats.
- Western yellow-billed cuckoo (*Coccyzus americanus occidentalis*) is a federally threatened and state endangered species that typically occurs in riparian forest habitat.
- Swainson's hawk (*Buteo swainsoni*) is a state threatened species that typically occurs in grassland, riparian forest, riparian woodland, and valley and foothill grassland habitats.
- Tricolored blackbird (*Agelaius tricolor*) is a state threatened species that typically occurs in freshwater marsh, marsh, swamp, and wetland habitats.
- Least Bell's vireo (*Vireo bellii pusillus*) is a federally and state threatened species that typically occurs in riparian forest, riparian scrub, and riparian woodland habitats.
- Western pond turtle (*Emys marmorata*) is a federally proposed threatened species that typically occurs in aquatic habitats.
- western spadefoot (*Spea hammondi*) is a federally proposed threatened species that typically occurs in cismontane woodland, coastal valley scrub, valley and foothill grassland, vernal pool, and wetland habitats.
- Northern California legless lizard (*Anniella pulchra*) is a state species of special concern that typically occurs in coastal dune, valley-foothill, chaparral, and coastal scrub habitats.
- Pallid bat (*Antrozous pallidus*) is a state species of special concern that typically roosts in rocky outcrops and cliffs, caves, mines, trees, and human structures such as bridges, barns, porches, bat boxes, and buildings.
- Western mastiff bat (*Eumops perotis*) is a state species of special concern that roosts in cliffs and building cervices.
- California glossy snake (*Arizona elegans occidentalis*) is a state species of special concern that typically occurs in dry, sandy, rocky areas.
- Burrowing owl (*Athene cunicularia*) is a state species of special concern that typically occurs in short-grass prairies, grasslands, lowland scrub, agricultural lands (particularly rangelands), prairies, coastal dunes, desert floors, and some artificial, open areas.

- Coast horned lizard (*Phrynosoma blainvillii*) is a state species of special concern that typically occurs in chaparral and coastal sage scrub vegetation.
- American badger (*Taxidea taxus*) is a state species of special concern that typically occurs within a variety of open, arid habitats, most commonly associated with grasslands, savannas, mountain meadows, and open areas of desert scrub.

No special-status flora or fauna was observed during the survey.

The project site does not provide suitable habitat for special-status animal species due to the dominance of non-native vegetation, lack of diversity, and lack of significant wildlife services (e.g., water source). While no trees are present on the project site, there are trees adjacent to the project site and in the general vicinity. Construction activities have the potential to impact nesting birds, if present. Mitigation Measure BIO-1 is applicable to avoid nesting activity within 500 feet of the project site. Common wildlife species that are adapted to urban environments are expected to continue to use the site and vicinity after redevelopment.

Therefore, the proposed project would not result in direct or indirect adverse effects of special-status plants or wildlife, and the impact would be *less than significant with mitigation*.

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?

Future development that occurs in the vicinity of the San Joaquin River, its tributaries, any lakes or streams, and/or open grasslands with seasonal wetlands, may result in a significant impact to riparian habitat or a special-status natural community. No riparian habitat or other sensitive natural communities occur within the project site, or within the vicinity of the project site. As a result, there would be *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?

According to the U.S. Fish and Wildlife Service National Wetlands Inventory Surface Waters and Wetlands Mapper, there are no mapped wetland areas within or adjacent to the project area. Based on the absence of wetlands within the project area, the project would not result in a substantial adverse effect on a federally or state-protected wetland; therefore, *no impacts* would occur.

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?

Open space areas, undeveloped land, and agricultural land are mainly located along the boundaries of the City, particularly near the northern boundary along the San

Joaquin River corridor. The San Joaquin River corridor functions as a wildlife movement corridor for a number of terrestrial and aquatic mammals and birds. The San Joaquin River corridor facilitates movement of wildlife species from the City to the Sierra Nevada Mountains to the east and open agricultural land to the west. The project site is not within or adjacent to the San Joaquin River corridor and the site does not provide substantial linkage to the corridor to facilitate wildlife movement. Therefore, there would be *no impact*.

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

The project would not conflict with any local policies or ordinances protecting biological resources. Though the proposed project is subject to provisions of the Fresno Municipal Code regarding trees on public property (Article 3 of Section 13 of the Fresno Municipal Code), the proposed project would not conflict with any of the existing ordinances. As a result, there would be *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?

The PG&E San Joaquin Valley Operation and Maintenance (O&M) Habitat Conservation Plan (HCP)⁸ was approved in 2007 and covers portions of nine counties, including Fresno County. This HCP covers PG&E activities which occur as a result of ongoing O&M that would have an adverse impact on any of the 65 covered species and provides incidental take coverage from the USFWS and CDFW. The project site is not located within the covered area of any HCP, Natural Community Conservation Plan (NCCP), or other adopted local, regional or state HCP. Therefore, the project would not conflict with the provisions of the PG&E HCP and the proposed project and would have *no impact*.

Mitigation Measures

BIO-1 Preconstruction Nesting Bird Survey. Prior to initiation of any site preparation/construction activities, if work is planned to occur between February 1 and September 15, a qualified biologist shall survey the area for nesting birds within 1 week prior to initial project activity beginning, including ground disturbance and/or vegetation removal/trimming. If nesting birds are located on or near the proposed project site, they shall be avoided until they have successfully fledged, or the nest is no longer deemed active, as detailed below:

1. A 50-foot exclusion zone shall be placed around non-listed, passerine species and a 250-foot exclusion zone will be implemented for raptor species. Each exclusion zone shall encircle the nest and have a radius

⁸ Pacific Gas and Electric (PG&E). 2007. PG&E San Joaquin Valley Operation & Maintenance Habitat Conservation Plan. Available online at: https://ecos.fws.gov/docs/plan_documents/thcp/thcp_838.pdf. Accessed July 10, 2024.

of 50 feet (non-listed passerine species) or 250 feet (raptor species). All project activities, including foot and vehicle traffic and storage of supplies and equipment, are prohibited inside exclusion zones. Exclusion zones shall be maintained until all exterior construction activities have been terminated for the current phase of work (e.g., if initial site improvements are completed, exclusion zones may be removed until initiation of site preparation for residence construction begins), or it has been determined by a qualified biologist that the young have fledged or that proposed project activities would not cause adverse impacts to the nest, adults, eggs, or young.

2. If special-status avian species are identified and nesting within the work area, no work will begin until an appropriate exclusion zone is determined in consultation with the City of Fresno and any relevant resource agencies.

The results of the survey shall be provided to the City of Fresno prior to initiation of site preparation/construction activities. The results shall detail appropriate fencing or flagging of exclusion zones and include recommendations for additional monitoring requirements. A map of the project site and nest locations shall be included with the results. The qualified biologist conducting the nesting survey shall have the authority to reduce or increase the recommended exclusion zone depending on site conditions and species (if non-listed).

If 2 weeks lapse between different phases of project activities (e.g., vegetation trimming, the start of grading), during which no or minimal work activity occurs, the nesting bird survey shall be repeated, and a separate survey report shall be prepared and submitted to the City of Fresno.

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		

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Disturb any human remains, including those interred outside of formal cemeteries?			X	

DISCUSSION

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

A historical resource defined by CEQA includes one or more of the following criteria: 1) the resource is listed, or found eligible for listing in, the California Register of Historical Resources (CRHR); 2) listed in a local register of historical resources as defined by Public Resources Code (PRC) Section 5020.1(k); 3) identified as significant in a historical resources survey meeting the requirements of PRC Section 5024.1(g); or 4) determined to be a historical resource by the project’s lead agency (PRC Section 21084.1; CEQA Guidelines Section 15064.(a)). Under CEQA, historical resources include built-environment resources and archaeological sites.

The project site does not contain historical resources listed or eligible for listing in the CRHR or in any local listing for Fresno County or the City of Fresno. Therefore, impacts would be *less than significant*.

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

According to the CEQA Guidelines, “When a project will impact an archaeological site, a lead agency shall first determine whether the site is an historical resource” (CEQA Guidelines Section 15064.5(c)(1)). Those archaeological sites that do not qualify as historical resources shall be assessed to determine if these qualify as “unique archaeological resources” (California PRC Section 21083.2).

On May 20, 2024, SWCA requested a records (literature) search from the California Historical Resources Information System (CHRIS) Southern San Joaquin Valley Information Center (SSJVIC), located at California State University, Bakersfield. No previously recorded archaeological resources were identified within the project site or within a quarter mile of the project site. However, due to the nominal amount of prehistoric archaeological information within the majority of the City, including the project site, there is potential to impact unknown prehistoric archaeological resources during grading and construction activities within previously undisturbed soils. Adherence to the requirements in Mitigation Measure CUL-1 would reduce potential impacts to unknown archeological resources to *less than significant with mitigation*.

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

There are no known human remains or cemeteries located within or in the immediate vicinity of the project site and the project area is considered to have low sensitivity for the presence of unidentified human resources. California Health and Safety Code Section 7050.5, outlines the protocol for unanticipated discovery of human remains. Section 7050.5 states that no further disturbance shall occur until the Fresno County Coroner has made a determination of origin and disposition pursuant to PRC Section 5097.98. The Fresno County Coroner must be notified of the find immediately. If the human remains are determined to be prehistoric, the coroner will notify the NAHC, which will determine and notify a Most Likely Descendant (MLD). The MLD shall complete the inspection of the project site within 48 hours of notification and may recommend scientific removal and nondestructive analysis of human remains and items associated with Native American burials. Based on compliance with California Health and Safety Code requirements, the project would not result in significance disturbance to human remains; therefore, impacts related to disturbance of human remains would be *less than significant*.

Mitigation Measures

CUL-1 Resource Discovery. If previously unknown resources are encountered before or during grading activities, construction shall stop in the immediate vicinity of the find and a qualified cultural resources specialist shall be consulted to determine whether the resource requires further study. The qualified cultural resources specialist shall make recommendations to the City of Fresno 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 California Environmental Quality Act (CEQA) Guidelines and the City of Fresno's Historic Preservation Ordinance. If the resources are determined to be unique historical resources as defined under State CEQA Guidelines Section 15064.5, measures shall be identified by the monitor and recommended to the Lead Agency. Appropriate measures for significant resources could include avoidance or capping; incorporation of the site in green space, parks, or open space; or data recovery excavations of the finds. No further grading shall occur in the area of the discovery until the Lead Agency approves the measures to protect these resources. Any historical artifacts recovered as a result of mitigation shall be provided to a City of Fresno-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
VI. ENERGY – Would the project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?			X	
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?			X	

DISCUSSION

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

The proposed project would be constructed using energy efficient modern building materials and construction practices, and the proposed project would also use new modern appliances and equipment, in accordance with the Appliance Efficiency Regulations (Title 20, CCR Sections 1601 through 1608).

During construction, fossil fuels, electricity, and natural gas would be used by construction vehicles and equipment. The energy consumed during construction would be temporary in nature and would be typical of other similar construction activities in the city. Federal and state regulations in place require the use of fuel-efficient equipment and vehicles and that wasteful activities, such as diesel idling, to be limited. Further, construction contractors, in an effort to ensure cost efficiency, would not be expected to engage in wasteful or unnecessary energy and fuel practices, such as diesel idling.

The expected energy consumption during 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. It can be assumed that implementation of the proposed project would result in additional energy demand in the city; however, the proposed building would be required to comply with applicable California Green Building Standards Code (CALGreen; California Code of Regulations [CCR] Title 24, Part 11) and California Energy Code (24 CCR Part 6) requirements to encourage energy efficient design. Therefore, the project would not result in wasteful, inefficient, or unnecessary consumption of energy resources, and impacts would be *less than significant*.

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

Energy use and generation contribute to GHG emissions; therefore, clean and renewable energy initiatives are consistent with State goals to reduce GHG emissions. On April 20, 2022, the Bay Area Air Quality Management District (BAAQMD) Board of Directors adopted an updated threshold of significance for climate impacts for long-term communitywide planning documents (e.g., general plans, long-range development plans, climate action plans). To demonstrate a less-than-significant climate impact, a plan must demonstrate that the community will reduce GHG emissions at least 40% below 1990 levels by 2030 and support the State’s goal of achieving carbon neutrality by 2045, or meet the requirements for a GHG reduction strategy in State CEQA Guidelines Section 15183.5(b).

For land use development projects, the BAAQMD recommends using the approach endorsed by the California Supreme Court in *Center for Biological Diversity v. Department of Fish & Wildlife* (2015) (62 Cal.4th 204), which evaluates a project based on its effect on California’s efforts to meet the State’s long-term climate goals. As the Supreme Court held in that case, a project that would be consistent with meeting those goals can be found to have a less-than-significant impact on climate change under CEQA. If a project would contribute its “fair share” of what will be required to achieve those long-term climate goals, then a reviewing agency can find that the impact will not be significant because the project will help to solve the problem of global climate change (62 Cal.4th 220–223). Applying this approach, the BAAQMD has analyzed what will be required of new land use development projects to achieve California’s long-term climate goal of carbon neutrality by 2045. As discussed in detail in Section VIII, Greenhouse Gas Emissions, the project would be consistent with the BAAQMD Thresholds for Land Use Projects and would contribute its “fair share” of implementing the goal of carbon neutrality by 2045.

As discussed in Impact Discussion VI.a), the project would not result in wasteful, inefficient, or unnecessary consumption of energy resources. The proposed project would be required to comply with CALGreen (24 CCR Part 11) and the California Energy Code (24 CCR Part 6), which include provisions related to insulation and design aimed at minimizing energy consumption. In addition, electricity would be provided by PG&E, which consists of 38% renewable energy sources and 57% GHG-free energy sources. By using electricity from PG&E, the project would reduce the long-term use of non-renewable energy resources, and operational energy consumption would be compliant with state and local goals for energy reduction.

The proposed project would also be required to comply with the City’s Greenhouse Gas Reduction Plan. The 2014 Greenhouse Gas Reduction Plan (GHG Plan) provided a comprehensive assessment of the benefits of the City’s General Plan and Development Code policies along with existing plans, programs, and initiatives that reduce GHG emissions. In addition, the GHG Plan includes an emission reduction target for demonstrating consistency with State GHG reduction targets. The analysis prepared to quantify GHG emissions and emission reductions provides the basis for

the GHG Plan targets and for CEQA significance findings of implementing the City's GHG Plan.

The 2021 Greenhouse Gas Reduction Plan Update (GHG Plan Update) was prepared to re-evaluate the City's existing GHG reduction targets and strategies. The GHG Plan Update provides new goals and supporting measures to reflect and ensure compliance with changes in the local and State policies while ensuring it encourages economic growth and keeps the city economically competitive while achieving GHG reductions and maintaining the "CEQA Qualified Plan" status.⁹

The proposed project would be compliant with relevant energy-efficient policies and recommendations outlined in the GHG Plan Update. The recommendations and policies that would be implemented by the project are outlined below.

Policy LU-2-a Infill Development and Redevelopment. Promote development of vacant, underdeveloped, and redevelop-able land within the City Limits where urban services are available by considering the establishment and implementation of supportive regulations and programs.

Policy MT-5-a Sidewalk Development. Pursue funding and implement standards for development of sidewalks on public streets, with priority given to meeting the needs of persons with physical and vision limitations; providing safe routes to school; completing pedestrian improvements in established neighborhoods with lower vehicle ownership rates; or providing pedestrian access to public transportation routes.

Policy MT-1-i Local Street Standards. Establish and implement local roadway standards addressing characteristics such as alignment, width, continuity and traffic calming, to provide efficient neighborhood circulation; to allow convenient access by residents, visitors, and public service and safety providers; and to promote neighborhood integrity and desired quality of life by limiting intrusive pass-through traffic.

The project would be developed on vacant land within the City limits where urban services are available. The project would construct a new sidewalk and streetlights along the project frontage on South Crystal Avenue. These elements would assist in the implementation of the above policies outlined in the City's 2021 GHG Plan Update. Therefore, the proposed project would not conflict or obstruct state and local plans for energy efficiency and renewable energy, and the impact would be *less than significant*.

⁹ City of Fresno. 2021. Appendix G-Greenhouse Gas Reduction Plan Update. Available at: <https://www.fresno.gov/wp-content/uploads/2023/03/F-2-Greenhouse-Gas-Reduction-Plan.pdf>. Accessed April 2024.

Mitigation Measures

Mitigation measures are not 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	
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?			X	

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

DISCUSSION

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

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

Fault ruptures are generally expected to occur along active fault traces that have exhibited signs of recent geological movement (i.e., in the last 11,000 years). Alquist-Priolo Earthquake Fault Zones delineate areas around active faults with potential surface fault rupture hazards that would require specific geological investigations prior to approval of certain kinds of development within the delineated area. The project site is not located within an Alquist-Priolo Earthquake Fault Zone. Therefore, the proposed project would not expose people or structures to risk as a result of fault rupture, and *no impact* would occur.

ii. Strong seismic ground shaking?

The city is located in an area with historically low to moderate levels of seismicity. However, strong ground shaking could occur within the project site during seismic events and occurrences have the possibility to result in significant impacts. Major seismic activity along the nearby San Andreas Fault Zone or the Nunez Fault (approximately 60 and 50 miles from the project site, respectively), or other associated faults, could affect the project site through strong seismic ground shaking. Strong seismic ground shaking could potentially cause structural damage

to the proposed project. However, due to the distance to the known faults, hazards due to ground shaking would be minimal. In addition, compliance with the California Building Code would ensure that the geotechnical design of the proposed project would reduce potential impacts related to seismic ground shaking to *less than significant*.

iii. Seismic-related ground failure, including liquefaction?

The predominant soils within the city consist of varying combinations of loose/very soft to very dense/hard silts, clays, sands, and gravels. Groundwater has been encountered near the ground surface in close proximity to water-filled features such as canals, ditches, ponds, and lakes. Based on these characteristics, the potential for soil liquefaction within the city ranges from very low to moderate due to the variable density of the subsurface soils and the presence of shallow groundwater. In addition to liquefaction, the city could be susceptible to induced settlement of loose unconsolidated soils or lateral spread during seismic shaking events. Based on the nature of the subsurface materials and the relatively low to moderate seismicity of the region, seismic settlement and/or lateral spread are not anticipated to represent a substantial hazard within the city during seismic events.

Based on the nature of the subsurface materials and the relatively low to moderate seismicity of the region, potential for seismic related ground failure is low in Fresno. Additionally, compliance with the Fresno Municipal Code and the California Building Code, as well as the City's General Plan Policies NS-2-a through NS-2-d would ensure that potential impacts associated with seismic-related ground failure would be *less than significant*.

iv. Landslides?

A landslide generally occurs on relatively steep slopes and/or on slopes underlain by weak materials. The city is located within an area that consists of mostly flat topography within the Central Valley. Accordingly, there is no risk of large landslides in the majority of the city. However, there is the potential for landslides and slumping along the steep banks of rivers, creeks, or drainage basins such as the San Joaquin River bluff and the many unlined basins and canals that trend throughout the city. The project site is located in a relatively flat area, and it is not in the vicinity of the San Joaquin River bluff or any unlined basins or canals. Therefore, the potential for the proposed project to expose people or structures to risk as a result of landslides would be *less than significant*.

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

Grading and earthmoving during project construction has the potential to result in erosion and loss of topsoil. Exposed soils could be entrained in stormwater runoff and transported off the project site. However, this impact would be reduced to a less than significant level through compliance with water quality control measures, which include preparation of a Stormwater Pollution Prevention Plan (SWPPP) (refer to Section X, Hydrology and Water Quality). A SWPPP is required for projects that include over one acre of disturbance. The majority of the 7.82-acre site would be

disturbed and paved. Although designed primarily to protect stormwater quality, the SWPPP would incorporate Best Management Practices (BMPs) to minimize erosion. Additional details regarding the SWPPP are provided in *Impact Discussion X, Hydrology and Water Quality*. This impact would be *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?

As described in discussion a) in this section, soils on the project site would not be subject to liquefaction, lateral spreading, or landslides. Additionally, the proposed project would be required to conform with the California Building Code, which would reduce risks related to unstable soils. Therefore, impacts related to unstable soils would be *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?

The surface and near-surface soils observed throughout the City consist of varying combinations of clays, silts, sands, gravels, and cobbles. Expansive soils are characterized by the potential for shrinking and swelling as the moisture content of the soil decreases and increases, respectively. The clayey soils, which consist of very fine particles, are considered to be slightly to moderately expansive. Soils at the project site include Ramona sandy loam and Delhi sand, 0 to 3 percent slopes, all soils with relatively low clay content and low expansion potential.¹⁰ Furthermore, compliance with recommendations from the Fresno Municipal Code would reduce potential impacts related to expansive soils to *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?

The project site would be served by a wastewater conveyance system maintained by the City's Wastewater Management Division (WMD). Wastewater from the City's collection system is treated at the Fresno/Clovis Regional Wastewater Reclamation Facility. Development of the proposed project would not involve the use of septic tanks or alternative wastewater disposal systems. Therefore, the proposed project would have *no impact* related to the use of septic tanks or alternative wastewater disposal systems.

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

The project site is underlain by marine and nonmarine (continental) sedimentary rocks of the Pleistocene-Holocene era (Q). Further, the project site has been historically

¹⁰ Natural Resources Conservation Service (NRCS). 2024. Web Soil Survey. U.S. Department of Agriculture Natural Resources Conservation Service. Available at: <https://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx>. Accessed May 2024.

used for agricultural purposes, and agricultural activities such as soil tilling reduces the potential for intact paleontological resources to be present within the project area.

Mitigation Measure GEO-1 would ensure that paleontological/geological resources found during project construction would be handled and preserved by a qualified paleontologist. Adherence to the requirements in Mitigation Measure GEO-1 would reduce potential impacts on paleontological and geological resources to less than significant. The impact is considered *less than significant with mitigation incorporated*.

Mitigation Measures

GEO-1 Paleontological Resource Discovery. In the event that unique paleontological resources are discovered during excavation and/or construction activities, construction shall stop in the immediate vicinity of the find and a qualified paleontologist shall be consulted to determine whether the resource requires further study. The qualified paleontologist 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. If the resources are determined to be significant, mitigation measures shall be identified by the monitor and recommended to the City. Appropriate mitigation 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 City approves the measures to protect these resources. Any paleontological/geological resources 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
VIII. GREENHOUSE GAS EMISSIONS – Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			X	
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?			X	

DISCUSSION

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

During construction, fossil fuels, electricity, and natural gas would be used by construction vehicles and equipment. Federal and state regulations in place require fuel-efficient equipment and vehicles and prohibit wasteful activities, such as diesel idling. Construction contractors, in an effort to ensure cost efficiency, would be expected to not engage in wasteful or unnecessary energy and fuel practices. Therefore, construction activities are not anticipated to result in significant GHG emissions.

Operational energy consumption would include electricity use for building operations and fossil fuel use for vehicle trips to and from the site. Electricity would be provided by PG&E, which consists of 38% renewable energy sources and 57% GHG-free energy sources.¹¹ By using electricity from PG&E, the project would reduce the long-term use of non-renewable energy resources, which would help reduce long-term GHG emissions associated with energy generation. The proposed building would be required to comply with applicable CALGreen (24 CCR Part 11) and California Energy Code (24 CCR Part 6) requirements to encourage energy efficient design, which would further reduce long-term GHG emissions associated with energy generation.

As discussed in *Section XVII, Transportation*, the project is not anticipated to generate VMT in a manner that could result in substantial consumption of fossil fuels. Further, as required by the California Building Code, the project is required to include the installation of EV-ready wiring to promote the use of long-term alternative fuel use. Therefore, the project would not result in substantial GHG emissions from transportation sources.

Based on the analysis provided above, the project is not anticipated to generate substantial GHG emissions during project construction or operation, and impacts would be *less than significant*.

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

The project is within the jurisdiction of the SJVAPCD, which released the San Joaquin Valley Climate Change Action Plan¹² in December 2009. The Climate Change Action Plan identifies goals and policies to address reductions in GHGs and improvement to regional air quality. The plan also includes a methodology for determining project-

¹¹ Pacific Gas and Electric Company (PG&E). 2022. Exploring Clean Energy Solutions. Available at: https://www.pge.com/en_US/about-pge/environment/what-we-are-doing/clean-energy-solutions/clean-energy-solutions.page. Accessed March 2024.

¹² San Joaquin Valley Air Pollution Control District (SJVAPCD). 2009. Guidance for Valley Land-use Agencies in Addressing GHG Emission Impacts for New Projects under CEQA. Available at: <https://www.valleyair.org/Programs/CCAP/12-17-09/3%20CCAP%20-%20FINAL%20LU%20Guidance%20-%20Dec%2017%202009.pdf>. Accessed October 2024.

specific Best Performance Standards (BPSs), which are described as mitigation measures intended to accomplish GHG reductions. BPSs may include building design elements that reduce energy consumption, project designs that promote pedestrian access, and land use planning decisions that reduce VMT. As discussed in Impact Discussion VIII.a), the project would be required to comply with state and local requirements to reduce construction and operational GHG emissions, would utilize clean energy sources and building design, and would not generate a substantial increase in VMT and associated vehicle emissions; therefore, the project would not generate significant GHG emissions during project construction or operation and would be consistent with the goals of the San Joaquin Valley Climate Change Action Plan.

Further, according to the process for evaluating GHG significance described in the San Joaquin Valley Climate Change Action Plan, projects that comply with an approved GHG emission reduction plan or GHG mitigation program which avoids or substantially reduces GHG emissions within the geographic area in which the project is located would be determined to have a less-than-significant individual and cumulative impact for GHG emissions. Such plans or programs must be specified in law or approved by the lead agency with jurisdiction over the affected resource and supported by a CEQA compliant environmental review document adopted by the lead agency. Projects complying with an approved GHG emission reduction plan or GHG mitigation program would not be required to formally implement BPSs.

On April 20, 2022, the BAAQMD Board of Directors adopted an updated threshold of significance for climate impacts for long-term communitywide planning documents (e.g., general plans, long-range development plans, climate action plans).¹³ To demonstrate a less-than-significant climate impact, the plan must demonstrate that the community will reduce GHG emissions at least 40% below 1990 levels by 2030 and support the State's goal of achieving carbon neutrality by 2045, or meet the requirements for a GHG reduction strategy in State CEQA Guidelines Section 15183.5(b).

As noted above, for land use development projects, the BAAQMD recommends using the approach endorsed by the California Supreme Court in *Center for Biological Diversity v. Department of Fish & Wildlife (2015)* (62 Cal.4th 204), which evaluates a project based on its effect on California's efforts to meet the State's long-term climate goals.¹⁴ As the Supreme Court held in that case, a project that would be consistent

¹³ Bay Area Air Quality Management District (BAAQMD). 2022. California Environmental Quality Act Appendix C Guidance for GHG Reduction Strategies. Available at: https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa-guidelines-2022/appendix-c-ghg-reduction-strategies_final_edits-for-ascent-pdf.pdf?rev=8e5bb7d8ad504dd6acc3c04e58bdf87&sc_lang=en. Accessed September 2024.

¹⁴ Bay Area Air Quality Management District (BAAQMD). 2022. Air Quality Guidelines Appendix B: CEQA Thresholds for Evaluating the Significance of Climate Impacts From Land Use Projects and Plans. Available at: https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa-guidelines-2022/appendix-b-thresholds-for-evaluating-significance-of-climate-impacts_final-

with meeting those goals can be found to have a less-than-significant impact on climate change under CEQA. If a project would contribute its “fair share” of what will be required to achieve those long-term climate goals, then a reviewing agency can find that the impact will not be significant because the project will help to solve the problem of global climate change (62 Cal.4th 220–223).

Applying this approach, the BAAQMD has analyzed what will be required of new land use development projects to achieve California’s long-term climate goal of carbon neutrality by 2045. The BAAQMD has found, based on this analysis, that a new land use development project being built today needs to incorporate the following design elements (either A or B) to do its “fair share” of implementing the goal of carbon neutrality by 2045:

A. Projects must include, at a minimum, the following project design elements:

1. Buildings

- a. The project will not include natural gas appliances or natural gas plumbing (in both residential and nonresidential development).
- b. The project will 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.

2. Transportation

- a. Achieve a reduction in project-generated vehicle miles traveled (VMT) below the regional average consistent with the current version of the California Climate Change Scoping Plan (currently 15 percent) or meet a locally adopted Senate Bill 743 VMT target, reflecting the recommendations provided in the Governor’s Office of Planning and Research’s Technical Advisory on Evaluating Transportation Impacts in CEQA:
 - i. Residential projects: 15 percent below the existing VMT per capita
 - ii. Office projects: 15 percent below the existing VMT per employee
 - iii. Retail projects: no net increase in existing VMT
- b. Achieve compliance with off-street electric vehicle

[pdf.pdf?rev=10305f45037b41dba2cd1b45b288d54b#:~:text=This%20report%20presents%20the%20Bay%20Area%20Air%20Quality%20Management%20District's.](#) Accessed September 2024.

requirements in the most recently adopted version of CALGreen Tier 2.

- B. Projects must be consistent with a local GHG reduction strategy that meets the criteria under State CEQA Guidelines Section 15183.5(b)

If a project is designed and built to incorporate these design elements, then it will 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 will not make a cumulatively considerable contribution to global climate change. If the project does not incorporate these design elements, then it should be found to make a significant climate impact because it will hinder California’s efforts to address climate change.

The project’s consistency with the BAAQMD thresholds for land use is shown in Table 4.

Table 4: Project Consistency with the BAAQMD Thresholds for Land Use Projects

BAAQMD Design Element	Evaluation of Project Consistency
<i>Buildings</i>	
The project will not include natural gas appliances or natural gas plumbing (in both residential and nonresidential development).	The proposed project will be conditioned to not require any connections to natural gas for residential uses; therefore, the project would not include natural gas appliances or natural gas plumbing.
The project will 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.	Please refer to <i>Impact Discussion VI(a)</i> . The project would not result in wasteful, inefficient, or unnecessary consumption of energy resources
<i>Transportation</i>	
Achieve a reduction in project-generated vehicle miles traveled (VMT) below the regional average	As discussed in <i>Section XVII, Transportation</i> , the project is not anticipated to generate VMT in a

Table 4: Project Consistency with the BAAQMD Thresholds for Land Use Projects

BAAQMD Design Element	Evaluation of Project Consistency
<p>consistent with the current version of the California Climate Change Scoping Plan (currently 15 percent) or meet a locally adopted Senate Bill 743 VMT target, reflecting the recommendations provided in the Governor’s Office of Planning and Research’s Technical Advisory on Evaluating Transportation Impacts in CEQA:</p> <ul style="list-style-type: none"> i. Residential projects: 15 percent below the existing VMT per capita ii. Office projects: 15 percent below the existing VMT per employee iii. Retail projects: no net increase in existing VMT 	<p>manner that would exceed the threshold of 15% below the existing VMT per capita.</p>
<p>Achieve compliance with off-street electric vehicle requirements in the most recently adopted version of CALGreen Tier 2.</p>	<p>The project would be required to meet CALGreen Tier 2 EV charging requirements, which for single family residential includes installation of electrical wiring pathways ("raceways") that are capable of supporting a Level 2 electric vehicle charging station.</p>

Source: BAAQMD (2022)

As shown in Table 4, the project would be consistent with the BAAQMD Thresholds for Land Use Projects and would contribute its “fair share” of implementing the goal of carbon neutrality by 2045. As such, the project would be consistent with an approved GHG emission reduction plan or GHG mitigation program intended to avoid or substantially reduce GHG emissions and would not be required to formally implement project-specific BPSs as identified in the San Joaquin Valley Climate Change Action Plan.

The proposed project would not conflict with plans, policies, or regulations adopted for the purpose of reducing GHG emissions, including the San Joaquin Valley Climate Change Action Plan or BAAQMD Thresholds for Land Use Projects; therefore, impacts would be *less than significant*.

Mitigation Measures

Mitigation measures are not required.

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
IX. HAZARDS AND HAZARDOUS MATERIALS – Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			X	
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?			X	
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?			X	
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				X

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?

Construction activities associated with the proposed project would involve the use of limited amounts of potentially hazardous materials, including but not limited to, solvents, paints, fuels, oils, and transmission fluids. However, all materials used during construction would be contained, stored, and handled in compliance with applicable standards and regulations established by the Department of Toxic Substances Control (DTSC), the U.S. Environmental Protection Agency (USEPA), and the Occupational Safety and Health Administration (OSHA). All storage, handling, and disposal of hazardous materials during project construction and operation would comply with applicable safety standards and regulations, including City General Plan Policies NS-4-a, NS-4-e, and NS-4-f.¹⁵ No manufacturing, industrial, or other uses utilizing large amounts of hazardous materials would occur within the project site. Therefore, impacts associated with the routine transport, use, or disposal of hazardous materials would be *less than significant*.

¹⁵ City of Fresno. 2014. Fresno General Plan-Noise and Safety Element, pgs. 9-33, 9-34. Available at: <https://www.fresno.gov/wp-content/uploads/2023/03/9-Noise-and-Safety-02-03-21.pdf>. Accessed April 2024.

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?

Refer to *Impact Discussion IX(a)*, above. The proposed project would not result in a significant hazard to the public or the environment through the transport of hazardous materials. Additionally, the City's General Plan includes Objective NS-4 and Policies NS-4-a, NS-4-c, NS-4-e, NS-4-f and NS-4-g, which require site and project-specific compliance with local, State and federal standards and procedures to avoid the release or upset of hazardous materials. Therefore, compliance with federal and state regulations and applicable City General Plan policies would ensure that the project would not result in significant hazards to the public or environment through the release of hazardous materials. The impact would be *less than significant*.

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

The closest existing school is Sunset Elementary School, located approximately 350 feet southeast from the project site. As previously stated, the proposed project would not result in the use or emission of substantial quantities of hazardous materials that would pose a human or environmental health risk. In addition, all materials would be handled, stored, and disposed of in accordance with applicable standards and regulations. Therefore, because the proposed project does not involve activities that would result in the emission of hazardous materials or acutely hazardous substances to an existing or proposed school. Therefore, implementation of the proposed project would not result in the use or emission of hazardous materials that would adversely affect a school. 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?

According to the DTSC EnviroStor database,¹⁶ the project site is not located on a federal superfund site, State response site, voluntary cleanup site, school cleanup site, evaluation site, school investigation site, military evaluation site, tiered permit site, or corrective action site. Additionally, the project site is not included on the list of hazardous waste sites compiled pursuant to Government Code Section 65962.5.¹⁷ As a result, no hazards to the public or environment are anticipated, and there would be *no impact*.

¹⁶ California Department of Toxic Substances Control. 2007. EnviroStor. Available at: <https://www.envirostor.dtsc.ca.gov/public/map/?myaddress=fresno>. Accessed April 2024.

¹⁷ California Environmental Protection Agency. 2018. Government Code Section 65962.5(a) Hazardous Waste and Substances Site List. Available at: <https://calepa.ca.gov/sitecleanup/corteselist/section-65962-5a/>. Accessed April 2024.

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

The nearest medical center helipads include the Community Regional Medical Center Helicopter Pads, located approximately 2.9 miles of the project site.¹⁸ The nearest airports include the Fresno Yosemite International Airport, located approximately 7.3 miles northeast of the project site, Fresno Chandler Executive Airport, located approximately 0.5 miles northeast of the project site, and the Sierra Sky Airport, located approximately 8.1 miles northwest of the project site. Each of these airports is considered under the Fresno County Airport Land Use Compatibility Plan (ALUCP), which guides local jurisdictions in determining appropriate compatible land uses with detailed findings and policies. The Fresno County ALUCP includes airport safety zone maps that are based on the likelihood of aircraft accident adjacent to airports.

The project site is within 2 miles of the Fresno Chandler Executive Airport and is located within the airport influence area Safety Zone 6 – Traffic Pattern Zone (TPZ). The aircraft accident risk level is considered to be low within the TPZ. While the site is located in an Airport Influence Area, the project site is outside of the noise contours outlined in the GP Noise and Safety Element Figure NS-5. Due to the distance between the project site and local airports and helipads, operations at these locations are not expected to pose a safety hazard for people within the project site. Therefore, the proposed project would not expose persons to airport-related hazards, and the potential impact would be *less than significant*.

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

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

¹⁸ California Department of Transportation (Caltrans). 2019. Caltrans HeliPlates. Available at: <https://heliplates.dot.ca.gov/#>. Accessed March 2024.

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

The project site is located in an area mapped as Local Responsibility Area (LRA) Unzoned, indicating that the area is urbanized and not susceptible to wildland conflagrations, and is not located within a very high fire hazard severity zone (VHFHSZ).¹⁹ Therefore, the proposed project would not expose people or structures to a significant loss, injury or death involving wildland fires and the impact would be *less than significant*.

Mitigation Measures

Mitigation measures are not required.

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	

¹⁹ California Department of Forestry and Fire Protection (CAL FIRE). 2024. *Fire Hazard Severity Zones in State Responsibility Area*. Available at: <https://calfire-forestry.maps.arcgis.com/apps/webappviewer/index.html?id=988d431a42b242b29d89597ab693d008>. Accessed April 2024.

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?

The State Water Resources Control Board and nine Regional Water Quality Control Boards regulate the water quality of surface water and groundwater bodies throughout California. The proposed project is within the jurisdiction of the Central Valley Regional Water Quality Control Board (RWQCB). There are no surface water features located within or adjacent to the project site; therefore, the project would not result in direct disturbance to any surface water features.

Pollutants of concern during construction include sediments, trash, petroleum products, concrete waste (dry and wet), sanitary waste, and chemicals. During project construction, there would be an increased potential to expose soils to wind and water erosion, which could result in temporary minimal increases in sediment load in nearby water bodies, including Dry Creek Canal, located .3 miles to the west of the project site.

The project would result in approximately 7.82 acres of site disturbance, which has the potential to result in erosion and other pollutants that could runoff into surrounding areas. In compliance with the City's General Plan, any development project disturbing one or more acres of soil must obtain coverage under the General Permit for Discharges of Storm Water Associated with Construction Activity (Construction General Permit Order 2009-0009-DWQ). Construction activities subject to the Construction General Permit includes clearing, grading, and other ground-disturbing activities such as stockpiling or excavation. The Construction General Permit requires development and implementation of a SWPPP for the proposed project.

A SWPPP includes features designed to eliminate contact of rainfall and stormwater runoff with sources of pollution that occur on construction sites, the main source being soil erosion resulting from unstable soils coming in contact with water and wind. These features are known as BMPs. Common BMPs to limit pollution in stormwater runoff from construction sites include maintaining or creating drainages to convey and direct surface runoff away from bare areas and installing physical barriers such as berms, silt fencing, waddles, straw bales, and gabions. Compliance with requirements under the National Pollutant Discharge Elimination System (NPDES) Construction General Permit, including the SWPPP and BMPs, would reduce project construction impacts on water quality to less than significant levels.

Long-term operation impacts associated with the proposed project would be reduced to less than significant levels with the implementation of the City's Storm Drainage and Flood Control Master Plan (SDFCMP), which manages the City's stormwater drainage systems, and the City's participation in the Phase 1 NPDES Permit for Stormwater Discharges From Municipal Separate Storm Sewer Systems (Phase 1 MS4), which requires the City to implement water quality and watershed protection measures for all development projects.

Therefore, impacts associated with the proposed project would be *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?

The project site is located in the Kings Subbasin of the San Joaquin Valley Groundwater Basin.²⁰ The Kings Subbasin encompasses an area of approximately 976,000 acres (1,530 square miles) within Fresno, Kern, and Tulare Counties; therefore, a marginal increase in impervious surface area at the site would not substantially interfere with groundwater recharge in a manner that could impede sustainable groundwater management of the basin.

²⁰ California Department of Water Resources (DWR). 2006. San Joaquin Valley Groundwater Basin Kings Subbasin. Available at: https://water.ca.gov/-/media/DWR-Website/Web-Pages/Programs/Groundwater-Management/Bulletin-118/Files/2003-Basin-Descriptions/5_022_08_KingsSubbasin.pdf. Accessed February 2024.

Water supply for the proposed project would be provided by the City through the Department of Public Utilities (DPU) Water and Wastewater Management Divisions. The City receives all of its water supply from groundwater. One of the primary objectives of Fresno's future water supply plans detailed in Fresno's current (2015) Urban Water Management Plan (UWMP)²¹ is to balance groundwater operations through a host of strategies. Through careful planning, Fresno has designed a comprehensive plan to accomplish this objective by increasing surface water supplies and surface water treatment facilities, intentional recharge, and conservation, thereby reducing groundwater pumping. The City continually monitors impacts of land use changes and development project proposals on water supply facilities by assigning fixed demand allocations to each parcel by land use as currently zoned or proposed to be rezoned.

In 2014, Fresno updated its Metropolitan Water Resources Management Plan designed to ensure the Fresno metro area has a reliable water supply through 2025. The plan implements a conjunctive use program, combining groundwater, treated surface water, artificial recharge and an enhanced water conservation program. In the near future, groundwater will continue to be an important part of the City's supply but will not be relied upon as heavily as has historically been the case. The City is planning to rely on expanding their delivery and treatment of surface water supplies and groundwater recharge activities.

The City maintains a comprehensive conservation program to help reduce per capita water usage and includes conservation programs and regulations such as landscaping standards for drought tolerance, irrigation control devices, leak detection and retrofits, water audits, public education and implementation of U.S. Bureau of Reclamation BMPs for water conservation to maintain surface water entitlements. The proposed project would comply with all applicable water conservation programs.

The proposed project would also be consistent with water management strategies from both the UWMP and the Metropolitan Water Resources Management Plan. Furthermore, the applicant would be required to comply with water management requirements and recommendations of the City DPU, which would reduce the project impacts to groundwater supply to less than significant.

Therefore, the project would not decrease groundwater supply or interfere with groundwater recharge, and impacts would be *less than significant*.

²¹ City of Fresno. 2021. 2020 Urban Water Management Plan - Final. Available at: https://www.fresno.gov/wp-content/uploads/2023/03/Fresno-2020-UWMP_Final_2021-07-21-1.pdf. Accessed April 2024.

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?

Construction of the proposed project would result in grading on the site that would expose native soils that could be subject to the effects associated with wind and water erosion unless adequate measures are taken to limit the transport of soils in surface water from the site to downstream locations.

Stormwater collection and disposal, and flood control for the City of Fresno, City of Clovis, and the unincorporated areas within the City of Fresno's sphere of influence are provided by the Fresno Metropolitan Flood Control District (FMFCD). There are no existing stormwater facilities on the project site or along South Crystal Avenue.

As required by the City's General Plan, a SWPPP would be developed prior to any ground disturbance at the project site and would include BMPs to reduce erosion and surface water contamination during construction of the proposed project. Additionally, compliance with the City's grading plan check process, the FMFCD Storm Drainage and Flood Control Master Plan (SDFCMP), and stipulations of the NPDES Construction General Permit would ensure that potential impacts related to erosion and saltation on- and off-site would be *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?

Ground-disturbing activities related to project construction, such as grading, excavation, placing fill, and trenching, could change existing surface drainage patterns and increase the potential for flooding, particularly during storm events. Regulatory mechanisms in place that would reduce the effects of construction activities on drainage patterns that would result in flooding on or off the construction site include compliance with the City's grading plan check process, the SDFCMP, and the NPDES Construction General Permit. Compliance with these required regulations would reduce project construction impacts on grading patterns and flooding on and off of the construction site to be *less than significant*.

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?

Refer to Impact Discussion X(a), X(c)(i), and X(c)(ii), above. The proposed project would increase impervious surfaces at the project site. However, with implementation of a SWPPP, which would require execution of BMPs for controlling pollution sources during project construction, compliance with the City's SDFCMP, and implementation of the NPDES Permit, the proposed project would not exceed capacity of stormwater drainage systems or generate additional sources of polluted runoff. Additionally, the applicant would pay the City a Drainage

Fee to address impacts related to increased amount of surface runoff resulting from the proposed project. The impact would be *less than significant*.

iv. Impede or redirect flood flows?

Title 40 of the Code of Federal Regulations, Part 60 regulations (40CFR60), and the City's floodplain ordinance require that placement and flood provision structures within a floodplain not result in a cumulative change in the floodplain water surface that exceeds one foot. In addition, the regulations under 40CFR60 do not allow placement of structures within a regulatory floodway unless that placement would not result in any increase in the floodplain water surface elevation, meaning that there is no displacement or redirection of the floodway. The proposed project is not located within the 100-year flood hazard area as mapped by the Federal Emergency Management Agency (FEMA).²² According to the FEMA Flood Insurance Rate Map (FIRM) 06019C2105H (effective date 2/18/2009), the proposed project is located within Zone X, an area of 0.2% annual chance of flood hazard and 1% annual chance of flood with average depth less than 1 foot or with drainage areas of less than 1 square mile. The City's floodplain ordinance applies to Special Flood Hazard Areas (SFHAs), including Zones A, AO, A1-A30, AE, A99, and AH. The project site is not located within an SFHA and would not be subject to the City's floodplain ordinance.²³ As a result, there would be *no impact*.

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

The project site is not located in flood hazard, tsunami, or seiche zones. Therefore, there would be *no impact*.

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

The project site is located within the Kings Subbasin, which is part of the larger San Joaquin Valley Groundwater Basin (California Department of Water Resources [DWR] Groundwater Subbasin Number 5-22.08). The planning documents regarding water resources for the city include the North Kings Groundwater Sustainability Act (GSA) Groundwater Management Plan, the City's UWMP, and the City's Metropolitan Water Resources Management Plan. As evaluated in *Impact Discussion X.b*), the project would not decrease groundwater supply or interfere with groundwater recharge in a manner that would impede sustainable management of the groundwater basin.

²² Federal Emergency Management Agency. 2020. FEMA Flood Map Service Center: Search By Address. Available at: <https://msc.fema.gov/portal/search?AddressQuery#searchresultsanchor>. Accessed April 2024.

²³ Federal Emergency Management Agency (FEMA). 2020. FEMA Flood Map Service Center: Search By Address. Available at: <https://msc.fema.gov/portal/search?AddressQuery#searchresultsanchor>. Accessed April 2024.

The project site is under the jurisdiction of the Central Valley RWQCB and would be subject to *The Water Quality Control Plan (Basin Plan) for the California Regional Water Quality Control Board Central Valley Region*,²⁴ which establishes water quality objectives for beneficial uses of water resources within the Sacramento and San Joaquin River Basins. The project would be required to comply with the Central Valley RWQCB general construction permit requirements. In addition, the project would be required to comply with Article 7 of the City’s Municipal Code, which requires the implementation of BMPs to reduce and/or eliminate pollutant discharge during construction. As a result, the project would not conflict with any applicable water quality control plan or groundwater management plan, and the impact would be *less than significant*.

Mitigation Measures

Mitigation measures are not 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?

The physical division of an established community typically refers to the construction of a physical feature (such as an interstate highway or railroad tracks) or removal of a means of access (such as a local road or bridge) that would impair mobility within an

²⁴ Regional Water Quality Control Board (RWQCB). 2019. *The Water Quality Control Plan (Basin Plan) for the California Regional Water Quality Control Board Central Valley Region*. Fifth Edition. California Regional Water Quality Control Board Central Valley Region. Revised February 2019 (with Approved Amendments). Available at: https://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/sacsjr_201902.pdf. Accessed February 2024.

existing community, or between a community and outlying areas. For instance, the construction of an interstate highway through an existing community may constrain travel from one side of the community to another; similarly, such construction may also impair travel to areas outside of the community.

The proposed project site is currently vacant and does not support housing. Surrounding areas include vacant land, agriculture, and single-family residences. The proposed project would include the construction of 84 single-family dwelling units. These improvements would not affect connectivity and would not divide an established community. Therefore, the proposed project would have *no impact*.

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

The project site is designated as Residential Medium Density in the City’s General Plan and is located in a RS-5 zoning district. This land use allows for single-Family residential developments between 5 to 12 units per acre.²⁵ As the project site is 7.82 and proposes 84 units, the project would achieve a ratio of 10.74 units per acre. The project would not require a change the City’s General Plan land use designation or the current zoning and would be consistent with the City’s General Plan and Zoning Ordinance. Additionally, the project would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, impacts would be *less than significant*.

Mitigation Measures

Mitigation measures are not 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	

²⁵ City of Fresno. 2016. Fresno Municipal Code Chapter 15: Citywide Development Code. Available at: https://library.municode.com/ca/fresno/codes/code_of_ordinances?nodemd=MUCOFR_CH15CIDECONRE. Accessed April 2024.

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	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?			X	

DISCUSSION

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

The principal area for mineral resources in the City is located along the San Joaquin River Corridor. The California Department of Mines and Geology classifies lands along the San Joaquin River Corridor as Mineral Resource Zone (MRZ) 1, MRZ-2, and MRZ-3. The project site is not located in the vicinity of the San Joaquin River and is not within an MRZ. The City’s General Plan includes Objective RC-10 and Policies RC-10-a through RC-10-f to conserve aggregate mineral resources, which would be applied by the proposed project, as applicable.²⁶ As a result, the proposed project would not result in the loss of availability of a known mineral resource of value to the region or residents of the State. Therefore, the impact would be *less than significant*.

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?

Refer to *Impact Discussion XII(a)*. The proposed project would not result in the loss of availability of any known locally important mineral resource recovery sites. Therefore, impacts would be *less than significant*.

Mitigation Measures

Mitigation measures are not required.

²⁶ City of Fresno. 2016. General Plan. Resource Conservation and Resilience. Available at: <https://www.fresno.gov/wp-content/uploads/2023/03/General-Plan-7-Resources-Conservation-and-Resilience-7-19.pdf> Accessed April 2024.

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

DISCUSSION

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

Short-Term (Construction) Noise Impacts. Project construction would result in short-term noise impacts on nearby sensitive receptors. Maximum construction noise would be short-term, generally intermittent depending on the construction phase, and variable depending on receiver distance from the active construction zone. The duration of noise impacts generally would be from one day to several days depending on the phase (e.g., demolition, land clearing, grading, excavation, erection) of construction. Noise produced by construction equipment such as earthmovers, material handlers, and portable generators can reach high levels. Generally, the grading phase of construction involves the most equipment and generates the highest noise levels, although noise ranges are usually similar across all construction phases. Typical noise levels generated by individual pieces of construction equipment generally range from approximately 77 dBA to 90 dBA Lmax at 50 feet. Depending on

the equipment required and duration of use, average-hourly noise levels associated with construction activity typically ranges from roughly 65 to 90 dBA Leq at 50 feet.

Certain land uses are considered more sensitive to noise than others. Examples of these include residential areas, educational facilities, hospitals, childcare facilities, and senior housing. The closest sensitive receptors to the proposed project include residences located immediately adjacent to the south and east of the project site.

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

Although development activities associated with the proposed project could potentially result in a temporary or periodic increase in ambient noise levels in the project vicinity, construction activity would be exempt from City of Fresno noise regulations, as long as such activity is conducted pursuant to an applicable construction permit and occurs between 7:00 a.m. and 10:00 p.m., excluding Sunday. Therefore, short-term construction impacts associated with the exposure of persons to or the generation of noise levels in excess of standards established in the City's General Plan or noise ordinance or applicable standards of other agencies would be *less than significant*.

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

The project site is located off a collector road. According to the City's General Plan, two-lane collector roads have an estimated existing dBA of 64.1, which would increase to 64.7 upon buildout of the City's General Plan. This increase of 0.6 would not result in a perceptible increase in traffic noise levels at receptors in the project vicinity and would be *less than significant*.

Additionally, development of the project site would increase activity at the site. Stationary noise sources associated with the project would include general residential activity, such as lawn maintenance equipment and swimming pool pumps. The City's General Plan Policy NS-1-a through Policy NS-1-p provide noise mitigation recommendations that would be implemented by the proposed project (e.g., sound-rated windows for sleeping, interior noise level requirements). With implementation of City General Plan policies, operation of the proposed project would not substantially increase noise levels over existing conditions, and the impact would be *less than significant*.

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

No permanent noise sources would be located within the project site that would expose persons to excessive groundborne vibration or noise levels. Construction activities associated with the proposed project are not expected to result in excessive groundborne vibration or groundborne noise levels. Therefore, the proposed project would not permanently expose persons within or around the project site to excessive groundborne vibration or noise and the impact 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?

The nearest medical center helipads include the Community Regional Medical Center Heliport Pads, located approximately 2.9 miles of the project site.²⁷ The nearest airports include the Fresno Yosemite International Airport, located approximately 7.3 miles northeast of the project site, Fresno Chandler Executive Airport, located approximately 0.5 miles northeast of the project site, and the Sierra Sky Airport, located approximately 8.1 miles northwest of the project site. Each of these airports is considered under the Fresno County ALUCP²⁸, which guides local jurisdictions in determining appropriate compatible land uses with detailed findings and policies. The City' General Plan, other City land use plans, and all City land use decisions must be compatible with the adopted ALUCP for Fresno County. The ALUCP includes community noise equivalent level (CNEL) noise contours based on projected airport and aircraft operations.

The project site is within 2 miles of the Fresno Chandler Executive Airport and is located within the airport influence area Safety Zone 6 – TPZ. The aircraft accident risk level is considered to be low within the TPZ. While the site is located in an Airport Influence Area, the project site is outside of the noise contours outlined in the GP Noise and Safety Element Figure NS-5. Therefore, the proposed project would not result in the exposure of sensitive receptors to the excessive noise levels from aircraft noise sources. The impact would be *less than significant*.

Mitigation Measures

Mitigation measures are not required.

²⁷ California Department of Transportation (Caltrans). 2019. Caltrans HeliPlates. Available at: <https://heliplates.dot.ca.gov/#>. Accessed April 2024.

²⁸ Fresno Council of Governments. 2018. Fresno County Airport Land Use Compatibility Plan. Amended December 2021. Available at: <https://www.dropbox.com/scl/fi/clh8iltq4f3eb10qyp93i/Fresno-Updated-ALUCP-Amended-Oct-2023.pdf?rlkey=e4ao8oy6ifk2btgzci95szb0u&e=1&dl=0>. Accessed April 2024.

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

DISCUSSION

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

The proposed project would include the development of 84 residential units across 74 buildings, including 10 attached single family townhouses (20 units), and 64 unattached single-family homes (64 units). The project would also include 22 guest parking spaces and a 0.16-acre park. Furthermore, the project site is designated as Residential Medium Density in the City’s General Plan and is located in a RS-5 zoning district. This land use allows for single-family residential developments between 5 to 12 units per acre.²⁹ As the project site is 7.82 and proposes 84 units, the project would achieve a ratio of 10.74 units per acre.

The proposed project would result in direct population growth as the use proposed is residential and would contribute to permanent residency on site. According to the CalEEMod model prepared for the project (Appendix A), the residential components of the project would generate a population of approximately 269 people. However, the proposed use of the project site is consistent with the City’s General Plan designation for the site and does not represent unplanned growth given that the project site would be developed consistent with its land use and zoning designations. Therefore, the proposed project would not directly or indirectly induce unplanned population growth and this impact would be *less than significant*.

²⁹ City of Fresno. 2016. Fresno Municipal Code Chapter 15: Citywide Development Code. Available at: https://library.municode.com/ca/fresno/codes/code_of_ordinances?nodeId=MUCOFR_CH15CIDECONRE. Accessed April 2024.

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

The 7.82-acre site is flat and currently undeveloped and vacant. The proposed project would not necessitate the displacement or removal of existing housing. Therefore, there would be *no impact*.

Mitigation Measures

Mitigation measures are not required.

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

DISCUSSION

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

i. Fire protection?

The City of Fresno Fire Department (FFD) would provide fire protection services to the proposed project. There are 20 FFD fire stations in Fresno, with the closest fire station, Fire Station 3, located approximately 1.85 miles east of the project site. Planned growth under the City's General Plan would increase calls for fire protection service in the City. The proposed use of the project site is consistent with the City's General Plan designation for the site and does not represent unplanned growth given that the project site would be developed consistent with its land use and zoning designations. The project could result in an incremental increase in the demand for fire protection services because of the would support approximately 269 residents. However, the proposed project would be required to pay a Fire Facilities Fee and a Development Impact Fee pursuant to Chapter 12, Article 4.9 of the City's Code of Ordinances to account for the potential impacts to fire services.

The FFD would continue providing services to the project site and would not require additional firefighters to serve the proposed project. The construction of a new or expanded fire station would not be required. The proposed project would not result in a significant impact on the physical environment due to the incremental increase in demand for fire protection and life safety services. The incremental increase in demand for services would not adversely affect existing responses times to the site or within the City. Therefore, impacts of construction and operation of the proposed project would be *less than significant*.

ii. Police protection?

The City of Fresno Police Department (FPD) provides police protection to the project site. The FPD Patrol Division is divided into five policing districts with the nearest being the Southwest Police District, located approximately 1.75 miles east of the project site. Planned growth under the City's General Plan would increase calls for police protection service in the City. The proposed use of the project site is consistent with the City's General Plan designation for the site and does not represent unplanned growth given that the project site would be developed consistent with its land use and zoning designation.

The project could result in an incremental increase in the demand for police protection services. However, the proposed project would be required to pay a Police Impact Fee and a Development Impact Fee pursuant to Chapter 12, Article

4.8 of the City's Code of Ordinances to account for the potential impacts to police protection services.

The FPD would continue providing services to the project site and would not require additional personnel to serve the proposed project. The construction of new or expanded police facilities would not be required. Therefore, the proposed project would not result in a substantial adverse impact associated with the provision of additional police facilities or services and impacts to police protection would be *less than significant*.

iii. Schools?

The project would be served by the Fresno Unified School District (FUSD). The nearest school to the project site is Sunset Elementary School, located approximately 350 feet southeast of the project site. As of 2021, FUSD serves 73,833 students.³⁰ Residential development occurring as a result of the proposed project would result in an impact on the FUSD student capacity and would generate approximately 53 students.³¹

The project could result in an incremental increase in school enrollment. However, the proposed project would be required to pay appropriate school fees pursuant to Chapter 12, Article 8 of the City's Code of Ordinances at time of building permits to address potential impacts.

The project would not require the construction of new or expanded school facilities would not be required. Therefore, the proposed project would not result in a substantial adverse impact associated with the provision of additional school facilities or services and impacts to schools would be *less than significant*.

iv. Parks?

The project would include a 0.16-acre internal park for use by residents and guests. The project could result in an incremental increase in the demand for parks as a result of additional 269 residents at the project site that might make use of nearby facilities. The developer would be required to pay applicable park facilities fees, pursuant to Chapter 12, Article 4.7 of the City's Code of Ordinances, to mitigate potential impacts of the proposed project on park facilities. Therefore, impacts to parks would be *less than significant*.

³⁰ Fresno Unified School District. 2021. FUSD District at a Glance Fact Sheet. Available at: <https://www.fresnounified.org/wp-content/uploads/district-at-a-glance-factsheet-2021.pdf>. Accessed April 2024.

³¹ Fresno Unified School District. 2022. FUSD Development Fee Justification Study. Available at: <https://facilities.fresnounified.org/wp-content/uploads/FUSD-Fee-Study-5-18-2022.pdf>. Accessed April 2024.

v. Other public facilities?

Development of the proposed project could also increase demand for other public services, including libraries, community centers, and public health care facilities. However, the proposed project would not result in significant population growth that would increase the demand for these facilities, such that new facilities would be needed to maintain service standards, as these facilities are not currently overused and have capacity to serve new demand. Therefore, impacts to other public facilities would be *less than significant*.

Mitigation Measures

Mitigation measures are not 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?

Several parks are located within the vicinity of the project site including Chandler park located 0.27 miles north, Basin Park located 0.47 miles east, Neilson park located 0.68 miles east, and Hyde park located 1 mile southeast. The proposed project may increase the demand for recreational facilities in the vicinity of the project site. However, the proposed project would include the construction of a 0.16-acre internal park. Additionally, the developer would be required to pay park impact fees pursuant to Chapter 12, Article 4.7 of the City’s Code of Ordinances at the time building permits

are obtained to account for potential impacts to recreational facilities. The impact fees would serve to offset project impact on existing recreational facilities. Therefore, the impact 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?

The proposed project would construct a 0.16-acre private park for use by the residents of the development and their guests. Potential environmental effects associated with establishment of these uses have been evaluated in the resource area discussions provided in this document. Implementation of the project would not require the construction or expansion of recreation facilities elsewhere; therefore, impacts would be *less than significant*.

Mitigation Measures

Mitigation measures are not required.

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

DISCUSSION

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

According to the Mobility and Transportation Element of the City’s General Plan, the proposed project is located within Traffic Impact Zone (TIZ) III (Figure MT-4 of the City’s General Plan). The Mobility and Transportation Element states that a detailed traffic analysis must be prepared for projects in TIZ III which generate more than 100 peak hour trips.

The CalEEMod model prepared for the project demonstrates that the project would generate approximately 793 daily trips (see Appendix A). Tables 5 and 6 provide the hourly traffic generation rates for the project, based on the 11th Edition of the Trip Generation Manual published by the Institute of Transportation Engineers (ITE).

Table 5: Trip Generation Rates (ITE)

Land Use	Unit	Daily	AM Peak Hour			PM Peak Hour		
			Total	In	Out	Total	In	Out
Single-Family Residential	DU	9.43	0.70	26%	74%	0.94	63%	37%

Source: Trip Generation Source: Institute of Transportation Engineers (ITE), Trip Generation Manual, Eleventh Edition (2021).

DU = Dwelling Unit Single-Family Residential = ITE Code 210

Table 6: Project Trip Generation

Land Use	Unit	Daily	AM Peak Hour			PM Peak Hour		
			Total	In	Out	Total	In	Out
Single-Family Residential	84 DU	793	59	15	44	79	50	29

Source: Trip Generation Source: Institute of Transportation Engineers (ITE), Trip Generation Manual, Eleventh Edition (2021).

DU = Dwelling Unit Single-Family Residential = ITE Code 210

As demonstrated above in Table 6, the proposed project is estimated to generate approximately 59 AM peak hour trips and 79 PM peak hour trips. As such, the proposed project does not exceed the 100 peak hour trips threshold for TIZ III.

The project site is located south of West Kearney Boulevard. No transit or bicycle paths are located near the project and no permanent changes to the existing circulation system including transit, roadway, bicycle, and pedestrian facilities would occur. The project would not conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system.

The proposed project is located in primarily residential area, and the operations of the proposed project would be consistent with the permitted uses of the area. The proposed project would not conflict with applicable existing transportation programs and policies. Therefore, the proposed project would result in a *less than significant* impact.

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

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

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

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

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.” The project does not meet any of the screening criteria identified in the City’s VMT Thresholds.

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

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

Based on the City’s VMT Tool calculation based on the project’s development details (see Appendix C), the project would generate 13.96 VMT/capita, which is less than the regional VMT threshold of 14.01 VMT/capita; therefore, the project would be consistent with CEQA Guidelines Section 15064.3(b) and VMT impacts would be *less than significant*.

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

The project would include frontage improvements along South Crystal Avenue to better support traffic through the area, which would be constructed in accordance with Fresno City construction standards. Otherwise, the project would not alter pedestrian or vehicle access to the project site would not introduce incompatible design features or equipment that would substantially increase the risk of hazards. Therefore, the project would not substantially increase hazards due to a design feature, and the impact would be *less than significant*.

d) Result in inadequate emergency access?

The proposed project would provide a gated emergency access at the southern end of the eastern boundary of the project site, which would exit onto South Crystal Avenue (Figure 3). Furthermore, roads adjacent to the project site would not require closure during project construction. Therefore, the impact would be *less than significant*.

Mitigation Measures

Mitigation measures are not required.

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

DISCUSSION

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

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

As previously discussed in Section V, Cultural Resources, the project site does not contain historical resources listed or eligible for listing in the California Register of Historical Resources, or in any local listing for Fresno County or the City of Fresno. Therefore, there would be *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 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.**

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

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

Assembly Bill (AB) 52, which became law January 1, 2015, requires that, as part of the CEQA review process, public agencies provide early notice of a project to California Native American Tribes to allow for consultation between the tribe and the public agency. The purpose of AB 52 is to provide the opportunity for public agencies and tribes to consult and consider potential impacts to Tribal Cultural Resources (TCR's), as defined by PRC Section 2107(a). Under AB 52, public

agencies shall reach out to California Native American Tribes who have requested to be notified of projects in areas within or which may have been affiliated with their tribal geographic range. Pursuant to Assembly Bill 52 (AB 52), each of these tribes were invited to consult. The contracted Tribes did not provide a response to invitations to consult.

If any artifacts are inadvertently discovered during ground-disturbing activities, existing federal, State, and local laws and regulations would require construction activities to cease until such artifacts are properly examined and determined not to be of significance by a qualified cultural resource professional. In addition, Mitigation Measures CUL-1 included above in Section V, Cultural Resources, would apply to the project and would reduce potential impacts to unknown tribal cultural resources to *less than significant*.

Mitigation Measures

Mitigation Measures CUL-1 included above in Section V, Cultural Resources, applies.

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?**

The DPU has determined that adequate sanitary sewer and water services would be available to serve the proposed project subject to the payment of any applicable connection charges and/or fees and extension of services in a manner which is compliant with the DPU standards, specifications, and policies.

Impacts to storm drainage facilities have been previously discussed in *Impact Discussion X, Hydrology and Water Quality*. While the proposed project would result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction such facilities would be required to comply with the City's grading plan check process, the FMFCD SDFCMP, and requirements of the NPDES General Construction Permit. As such, construction of storm drainage facilities for the proposed project would be consistent with construction and design standards for the City, and the impact would be *less than significant*.

Electric power, natural gas, and telecommunication facilities would require connections to the project site. However, because the project site is located within an urbanized area with existing facilities in close proximity, connection to these facilities would not cause significant environmental effects. As a result, the project would not result in the relocation or construction or new or expanded utilities, which could cause significant environmental effects, and the impact 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?

Water supply for the proposed project would be provided by the City through the DPU Water and Wastewater Management Divisions. Based on the 2015 UWMP, the water supplies for the City (363,540 Acre Feet (AF)/year) are adequate to accommodate the demand in the City by 2040 (i.e., 228,091 AF/year), and at buildout of the City's General Plan in 2056 (i.e., 254,834 AF/year). The proposed project is accounted for in the City's General Plan and would be consistent with the City's UWMP and therefore would be covered by the City's water supply projections. As a result, there would be sufficient water supply for the project, and the impact would be *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?

The proposed project is not expected to exceed wastewater treatment requirements of the RWQCB. The City owns and operates two wastewater treatment facilities. They are the Fresno/Clovis Regional Wastewater Reclamation Facility and the North Fresno Wastewater Reclamation Facility. The RWRf currently has a capacity of 91.5 million gallons per day (mgd). The North Facility has a capacity of 0.71 mgd. The proposed project is not expected to exceed the capacity of existing wastewater-related services and facilities. Therefore, the impact 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?

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

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

Other landfills within the County of Fresno include the Clovis Landfill (City of Clovis Landfill 10-AA-0004) with a maximum remaining permitted capacity of 7,740,000 cubic yards, a maximum permitted throughput of 2,000 tons per day, and an estimated closure date of 2047.³³

³² CalRecycle. 2023. American Avenue Landfill. Available at: <https://www2.calrecycle.ca.gov/SolidWaste/Site/Summary/352>. Accessed May 2024.

³³ CalRecycle. 2023. Clovis Landfill. Available at: <https://www2.calrecycle.ca.gov/SolidWaste/Site/Summary/347>. Accessed May 2024.

Operation of the proposed project would generate approximately 1,027 pounds of solid waste per day or about 187 tons of solid waste per year.³⁴ Given the available capacity at the landfills, the additional solid waste generated by the proposed project is not anticipated to cause the facility to exceed its daily permitted capacity. As such, the project would be served by a landfill with sufficient capacity to accommodate the project’s waste disposal needs, and impacts associated with the disposition of solid waste would be *less than significant*.

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

The proposed project would comply with Cal Green, the City’s Construction and Demolition (C&D) Waste Management Guide, and with waste management policies and recommendations from the City’s General Plan and the Greenhouse Gas Reduction Plan Update.³⁵ The proposed project would dispose of waste in accordance with applicable federal, state, and local recycling, reduction, and waste requirements and policies. Therefore, the proposed project would not conflict with federal, state, and local management and reduction statutes and regulations related to solid waste, and the impact would be *less than significant*.

Mitigation Measures

Mitigation measures are not 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	

³⁴ CalRecycle. 2006. Residential Sector Generation Rates. Available at: <https://www2.calrecycle.ca.gov/wastecharacterization/general/rates#Residential>. Accessed May 2024.

³⁵ City of Fresno, 2021. Greenhouse Gas Reduction Plan Update. Available at: <https://www.fresno.gov/wp-content/uploads/2023/03/F-2-Greenhouse-Gas-Reduction-Plan.pdf>. Accessed May 2024.

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	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?			X	
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?			X	
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?			X	

DISCUSSION

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

The proposed project would not interfere with any emergency evacuation routes within the City of Fresno or an adopted emergency response plan. The project would also include frontage improvements along South Crystal Avenue which will improve vehicle flow and possibly emergency response and evacuation efforts in the project area. Therefore, the proposed project would be consistent with the *Fresno General Plan*

Noise and Safety Element³⁶ and the Fresno County Multi-Jurisdictional Hazard Mitigation Plan,³⁷ and impacts would be *less than significant*.

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

The project site is not located within a Very High Fire Hazard Severity Zone (VHFHSZ).³⁸ The project site does not possess physical characteristics that would exacerbate wildfire risks, the parcel is flat and there is no vegetation beyond ruderal grasses. Therefore, the proposed project would not exacerbate wildfire risks and potentially expose project occupants to pollutants from a wildfire. The impact would 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?

The project site is located in a developed area of the city and it would not require the installation or maintenance of infrastructure that would increase the risk of fire or result in temporary or ongoing environmental impacts, outside of what is already implemented according to City plans. As a result, impacts would be *less than significant*.

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?

The project site is located on a relatively flat area and is not located adjacent to any hills. In general, the potential for land sliding or slope failure in Fresno is very low and the project site would not be susceptible to landslides. The project site is also not located on a flood hazard zone and would not be susceptible to flooding because of post-fire drainage changes. As discussed above, the project is not located within a VHFHSZ. Therefore, the proposed project would not expose people or structures to significant risks, and impacts would be *less than significant*.

³⁶ City of Fresno. 2014. *Fresno General Plan, 9: Noise and Safety Element*. Adopted December 18. Available at: <https://www.fresno.gov/wp-content/uploads/2023/03/9-Noise-and-Safety-02-03-21.pdf>. Accessed April 2024.

³⁷ County of Fresno. 2018. *Fresno County Multi-Jurisdictional Hazard Mitigation Plan*. May. Available at: <https://www.fresnocountyca.gov/files/sharedassets/county/v1/public-health/fresno-county-hmp-final.pdf>. Accessed April 2024.

³⁸ California Department of Forestry and Fire Protection (CAL FIRE). 2008. Fresno County Very High Fire Hazard Severity Zones in LRA. Available at: <https://osfm.fire.ca.gov/divisions/wildfire-planning-engineering/wildland-hazards-building-codes/fire-hazard-severity-zones-maps/>. Accessed April 2024.

Mitigation Measures

Mitigation measures are not required.

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

DISCUSSION

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

The project site does not contain adequate habitat for special status plants or wildlife species and is not in a location that provides adequate linkage for wildlife migration/movement. Construction activities have the potential to impact nesting birds if present in nearby trees. Implementation of mitigation would require avoidance of nesting activities. Therefore, with the incorporation of mitigation measures, development of the proposed project would not: 1) degrade the quality of the environment; 2) substantially reduce the habitat of a fish or wildlife species; 3) cause a fish or wildlife species population to drop below self-sustaining levels; 4) threaten to eliminate a plant or animal community; 5) reduce the number or restrict the range of a rare or endangered plant or animal; or 6) eliminate important examples of the major periods of California history. Therefore, this impact would be *less than significant*.

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

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

For the topics of Agriculture and Forestry Resources, Energy, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology/Water Quality, Land Use/Planning, Mineral Resources, Noise, Population/Housing, Public Services, Recreation, Utilities/Service Systems, and Wildfire, the project would have no impacts or less-than-significant impacts, and therefore, the project would not substantially contribute to any potential cumulative impacts for these topics. All environmental impacts that could occur as a result of the proposed project would be reduced to a less-than-significant level through the implementation of the mitigation measures recommended in this document.

Implementation of these measures would ensure that the impacts of the project would be below established thresholds of significance and that these impacts would not combine with the impacts of other cumulative projects to result in a cumulatively

considerable impact on the environment as a result of project development. Therefore, this impact would be less than significant.

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

The proposed project's potential to result in environmental effects that could directly or indirectly impacts human beings have been evaluated in this Initial Study. With implementation of the recommended mitigation measures, all environmental effects that could adversely affect human beings would be *less than significant with mitigation*.

MITIGATION MONITORING AND REPORTING PROGRAM – DECEMBER 16, 2024

This Mitigation Monitoring and Reporting Program (MMRP) has been formulated based upon the findings of the Initial Study/Mitigated Negative Declaration (IS/MND) for Environmental Assessment No. T-6468/P23-04016. The MMRP lists mitigation measures recommended in the IS/MND for the proposed Project and identifies monitoring and reporting requirements as well as conditions recommended by responsible agencies who commented on the project.

The first column of the Table identifies the mitigation measure. The second column, entitled “Party Responsible for Implementing Mitigation,” names the party responsible for carrying out the required action. The third column, “Implementation Timing,” identifies the time the mitigation measure should be initiated. The fourth column, “Party Responsible for Monitoring,” names the party ultimately responsible for ensuring that the mitigation measure is implemented. The last column will be used by the City to ensure that individual mitigation measures have been monitored.

Mitigation Measure	Party responsible for Implementing Mitigation	Implementation Timing	Party responsible for Monitoring	Verification (name/date)
<p>AQ-1. Permit Requirements. Prior to ground disturbance and construction, the Construction Contractor shall obtain all required permits for dust control and the use of portable equipment, 50 horsepower or greater, from the San Joaquin Valley Air Pollution Control District. Upon application for construction permits, all required mitigation measures shall be shown on all applicable grading or construction plans and implemented during all applicable grading and construction activities.</p>	Project Applicant and Project Architect	Prior to ground disturbance and construction	San Joaquin Valley Air Pollution Control District	
<p>AQ-2. Dust Control Measures. No person shall perform any construction, demolition, excavation, extraction, or other earth-moving activities unless measures are sufficiently implemented to limit visible dust emissions (VDE) to 20% opacity and comply with the conditions for a stabilized surface area when applicable. In addition to the requirements of this rule, a person shall comply with all other applicable requirements of San Joaquin Valley Air Pollution Control District Regulation VIII. A person shall control the fugitive dust emissions to meet the following requirements:</p> <ol style="list-style-type: none"> 1. Pre-Activity: <ol style="list-style-type: none"> a. Pre-water site sufficient to limit VDE to 20% opacity, and b. Phase work to reduce the amount of disturbed surface area at any one time. 2. During Active Operations: <ol style="list-style-type: none"> a. Apply water or chemical/organic stabilizers/suppressants sufficient to limit VDE to 20% opacity; or 	Project Applicant	Prior to and during construction operations.	San Joaquin Valley Air Pollution Control District	

Mitigation Measure	Party responsible for Implementing Mitigation	Implementation Timing	Party responsible for Monitoring	Verification (name/date)
<ul style="list-style-type: none"> b. Construct and maintain wind barriers sufficient to limit VDE to 20% opacity. If utilizing wind barriers, control measure 2.a above shall also be implemented. c. Apply water or chemical/organic stabilizers/suppressants to unpaved haul/access roads and unpaved vehicle/equipment traffic areas sufficient to limit VDE to 20% opacity and meet the conditions of a stabilized unpaved road surface. <p>3. Temporary Stabilization During Periods of Inactivity:</p> <ul style="list-style-type: none"> a. Restrict vehicular access to the area; and b. Apply water or chemical/organic stabilizers/suppressants, sufficient to comply with the conditions of a stabilized surface. If an area having 0.5 acre or more of disturbed surface area remains unused for 7 or more days, the area must comply with the conditions for a stabilized surface area as defined in Section 3.58 of Rule 8011. 				
<p>AQ-3: Construction Emissions. The project shall utilize clean off-road construction equipment, including the latest tier equipment, where feasible.</p>	Project Applicant	During construction	City of Fresno, Planning and Development Department	
<p>BIO-1: Preconstruction Nesting Bird Survey. Prior to initiation of any site preparation/construction activities, if work is planned to occur between February 1 and September 15, a qualified biologist shall survey the area for nesting birds within 1 week</p>	Project Applicant and qualified biologist	Prior to initiation of any site preparation/construction	City of Fresno, Planning and Development	

Mitigation Measure	Party responsible for Implementing Mitigation	Implementation Timing	Party responsible for Monitoring	Verification (name/date)
<p>prior to initial project activity beginning, including ground disturbance and/or vegetation removal/trimming. If nesting birds are located on or near the proposed project site, they shall be avoided until they have successfully fledged, or the nest is no longer deemed active, as detailed below:</p> <ol style="list-style-type: none"> 1. A 50-foot exclusion zone shall be placed around non-listed, passerine species and a 250-foot exclusion zone will be implemented for raptor species. Each exclusion zone shall encircle the nest and have a radius of 50 feet (non-listed passerine species) or 250 feet (raptor species). All project activities, including foot and vehicle traffic and storage of supplies and equipment, are prohibited inside exclusion zones. Exclusion zones shall be maintained until all exterior construction activities have been terminated for the current phase of work (e.g., if initial site improvements are completed, exclusion zones may be removed until initiation of site preparation for residence construction begins), or it has been determined by a qualified biologist that the young have fledged or that proposed project activities would not cause adverse impacts to the nest, adults, eggs, or young. 2. If special-status avian species are identified and nesting within the work area, no work will begin until an appropriate exclusion zone is determined in consultation with the City of Fresno and any relevant resource agencies. <p>The results of the survey shall be provided to the City of Fresno prior to initiation of site preparation/construction activities. The results shall detail appropriate fencing or flagging of exclusion zones and include recommendations for additional monitoring</p>			Department & California Department of Fish and Wildlife	

Mitigation Measure	Party responsible for Implementing Mitigation	Implementation Timing	Party responsible for Monitoring	Verification (name/date)
<p>requirements. A map of the project site and nest locations shall be included with the results. The qualified biologist conducting the nesting survey shall have the authority to reduce or increase the recommended exclusion zone depending on site conditions and species (if non-listed).</p> <p>If 2 weeks lapse between different phases of project activities (e.g., vegetation trimming, the start of grading), during which no or minimal work activity occurs, the nesting bird survey shall be repeated, and a separate survey report shall be prepared and submitted to the City of Fresno.</p>				
<p>CUL-1: Resource Discovery. If previously unknown resources are encountered before or during grading activities, construction shall stop in the immediate vicinity of the find and a qualified cultural resources specialist shall be consulted to determine whether the resource requires further study. The qualified cultural resources specialist shall make recommendations to the City of Fresno 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 California Environmental Quality Act (CEQA) Guidelines and the City of Fresno’s Historic Preservation Ordinance. If the resources are determined to be unique historical resources as defined under State CEQA Guidelines Section 15064.5, 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</p>	<p>Project Applicant and qualified historical resources specialist</p>	<p>Planning and Development Department to review construction specifications to ensure inclusion of provisions included in mitigation measure.</p>	<p>City of Fresno, Planning and Development Department</p>	

Mitigation Measure	Party responsible for Implementing Mitigation	Implementation Timing	Party responsible for Monitoring	Verification (name/date)
grading shall occur in the area of the discovery until the Lead Agency approves the measures to protect these resources. Any historical artifacts recovered as a result of mitigation shall be provided to a City of Fresno-approved institution or person who is capable of providing long-term preservation to allow future scientific study.				
<p>DTSC-1: The Department of Toxic Substances Control recommends that all imported soil and fill material should be tested to assess any contaminants of concern meet screening levels as outlined in DTSC’s Preliminary Endangerment Assessment (PEA) Guidance Manual (https://dtsc.ca.gov/wp-content/uploads/sites/31/2023/06/PEA_Guidance_Manual.pdf). Additionally, DTSC advises referencing the DTSC Information Advisory Clean Imported Fill Material Fact Sheet (https://dtsc.ca.gov/information-advisory-clean-imported-fill-material-fact-sheet/) if importing fill is necessary. To minimize the possibility of introducing contaminated soil and fill material there should be documentation of the origins of the soil or fill material and, if applicable, sampling be conducted to ensure that the imported soil and fill material are suitable for the intended land use. The soil sampling should include analysis based on the source of the fill and knowledge of prior land use. Additional information can be found by visiting DTSC’s Human and Ecological Risk Office (HERO) webpage (https://dtsc.ca.gov/human-health-risk-hero/). For guidance on these recommendations, email CEQAReview@dtsc.ca.gov.</p>	Project applicant	During construction.	City of Fresno, Planning and Development	
<p>GEO-1: Paleontological Resource Discovery. In the event that unique paleontological resources are discovered during</p>	Project Applicant	Planning and Development	City of Fresno,	

Mitigation Measure	Party responsible for Implementing Mitigation	Implementation Timing	Party responsible for Monitoring	Verification (name/date)
<p>excavation and/or construction activities, construction shall stop in the immediate vicinity of the find and a qualified paleontologist shall be consulted to determine whether the resource requires further study. The qualified paleontologist 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. If the resources are determined to be significant, mitigation measures shall be identified by the monitor and recommended to the City. Appropriate mitigation 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 City approves the measures to protect these resources. Any paleontological/geological resources 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.</p>		<p>Department to review construction specifications to ensure inclusion of provisions included in mitigation measure.</p>	<p>Planning and Development Department</p>	

APPENDIX A

CalEEMod Results

South Crystal Ave Custom Report

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1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	South Crystal Ave
Construction Start Date	1/1/2025
Operational Year	2025
Lead Agency	—
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	2.70
Precipitation (days)	22.6
Location	1604 S Crystal Ave, Fresno, CA 93706, USA
County	Fresno
City	Fresno
Air District	San Joaquin Valley APCD
Air Basin	San Joaquin Valley
TAZ	2475
EDFZ	5
Electric Utility	Pacific Gas & Electric Company
Gas Utility	Pacific Gas & Electric
App Version	2022.1.1.25

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
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Single Family Housing	84.0	Dwelling Unit	7.80	163,800	983,880	0.00	269	—
Other Asphalt Surfaces	2.13	Acre	7.82	0.00	0.00	0.00	—	—
City Park	0.41	Acre	7.82	0.00	2,178	2,178	—	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

2. Emissions Summary

2.1. Construction Emissions Compared Against Thresholds

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

Un/Mit.	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	3.28	29.8	29.1	0.06	1.24	9.33	10.6	1.14	3.69	4.82	—	6,801	6,801	0.27	0.07	0.99	6,830
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	50.1	31.7	30.7	0.06	1.37	19.8	21.1	1.26	10.1	11.4	—	6,706	6,706	0.27	0.06	0.03	6,731
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	4.75	14.5	16.0	0.03	0.60	2.95	3.55	0.55	1.30	1.85	—	3,341	3,341	0.13	0.04	0.26	3,357
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.87	2.65	2.92	0.01	0.11	0.54	0.65	0.10	0.24	0.34	—	553	553	0.02	0.01	0.04	556

2.2. Construction Emissions by Year, Unmitigated

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

Year	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	3.28	29.8	29.1	0.06	1.24	9.33	10.6	1.14	3.69	4.82	—	6,801	6,801	0.27	0.07	0.99	6,830
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	50.1	31.7	30.7	0.06	1.37	19.8	21.1	1.26	10.1	11.4	—	6,706	6,706	0.27	0.06	0.03	6,731
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	4.75	14.5	16.0	0.03	0.60	2.95	3.55	0.55	1.30	1.85	—	3,341	3,341	0.13	0.04	0.26	3,357
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	0.87	2.65	2.92	0.01	0.11	0.54	0.65	0.10	0.24	0.34	—	553	553	0.02	0.01	0.04	556

2.4. Operations Emissions Compared Against Thresholds

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

Un/Mit.	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	9.50	3.99	41.7	0.11	2.86	2.82	5.68	2.76	0.71	3.47	503	6,071	6,574	7.20	0.22	14.5	6,835
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	8.68	4.25	35.6	0.10	2.86	2.82	5.68	2.76	0.71	3.47	503	5,759	6,262	7.24	0.24	1.52	6,516
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	7.23	3.29	22.2	0.05	0.72	2.71	3.43	0.69	0.69	1.38	149	5,084	5,234	5.55	0.23	6.79	5,446

Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.32	0.60	4.05	0.01	0.13	0.50	0.63	0.13	0.13	0.25	24.7	842	866	0.92	0.04	1.12	902

2.5. Operations Emissions by Sector, Unmitigated

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

Sector	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	3.05	2.12	17.3	0.04	0.03	2.82	2.85	0.03	0.71	0.74	—	3,657	3,657	0.19	0.20	13.3	3,734
Area	6.40	1.05	24.0	0.07	2.76	—	2.76	2.66	—	2.66	457	897	1,354	2.15	< 0.005	—	1,408
Energy	0.05	0.83	0.35	0.01	0.07	—	0.07	0.07	—	0.07	—	1,486	1,486	0.16	0.01	—	1,494
Water	—	—	—	—	—	—	—	—	—	—	6.49	29.9	36.3	0.67	0.02	—	58.0
Waste	—	—	—	—	—	—	—	—	—	—	40.3	0.00	40.3	4.02	0.00	—	141
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.17	1.17
Total	9.50	3.99	41.7	0.11	2.86	2.82	5.68	2.76	0.71	3.47	503	6,071	6,574	7.20	0.22	14.5	6,835
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	2.66	2.42	16.0	0.03	0.03	2.82	2.85	0.03	0.71	0.74	—	3,359	3,359	0.23	0.21	0.34	3,428
Area	5.97	1.01	19.3	0.07	2.76	—	2.76	2.66	—	2.66	457	884	1,341	2.15	< 0.005	—	1,395
Energy	0.05	0.83	0.35	0.01	0.07	—	0.07	0.07	—	0.07	—	1,486	1,486	0.16	0.01	—	1,494
Water	—	—	—	—	—	—	—	—	—	—	6.49	29.9	36.3	0.67	0.02	—	58.0
Waste	—	—	—	—	—	—	—	—	—	—	40.3	0.00	40.3	4.02	0.00	—	141
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.17	1.17
Total	8.68	4.25	35.6	0.10	2.86	2.82	5.68	2.76	0.71	3.47	503	5,759	6,262	7.24	0.24	1.52	6,516
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Mobile	2.65	2.22	15.2	0.03	0.03	2.71	2.74	0.03	0.69	0.71	—	3,363	3,363	0.20	0.20	5.61	3,433
Area	4.53	0.25	6.67	0.01	0.62	—	0.62	0.60	—	0.60	103	205	308	0.48	< 0.005	—	320
Energy	0.05	0.83	0.35	0.01	0.07	—	0.07	0.07	—	0.07	—	1,486	1,486	0.16	0.01	—	1,494
Water	—	—	—	—	—	—	—	—	—	—	6.49	29.9	36.3	0.67	0.02	—	58.0
Waste	—	—	—	—	—	—	—	—	—	—	40.3	0.00	40.3	4.02	0.00	—	141
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.17	1.17
Total	7.23	3.29	22.2	0.05	0.72	2.71	3.43	0.69	0.69	1.38	149	5,084	5,234	5.55	0.23	6.79	5,446
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.48	0.40	2.77	0.01	0.01	0.50	0.50	< 0.005	0.13	0.13	—	557	557	0.03	0.03	0.93	568
Area	0.83	0.05	1.22	< 0.005	0.11	—	0.11	0.11	—	0.11	17.0	33.9	50.9	0.08	< 0.005	—	52.9
Energy	0.01	0.15	0.06	< 0.005	0.01	—	0.01	0.01	—	0.01	—	246	246	0.03	< 0.005	—	247
Water	—	—	—	—	—	—	—	—	—	—	1.07	4.94	6.02	0.11	< 0.005	—	9.60
Waste	—	—	—	—	—	—	—	—	—	—	6.67	0.00	6.67	0.67	0.00	—	23.3
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.19	0.19
Total	1.32	0.60	4.05	0.01	0.13	0.50	0.63	0.13	0.13	0.25	24.7	842	866	0.92	0.04	1.12	902

3. Construction Emissions Details

3.1. Mobilization & Preparation (2025) - Unmitigated

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

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

Off-Road Equipment	3.31	31.6	30.2	0.05	1.37	—	1.37	1.26	—	1.26	—	5,295	5,295	0.21	0.04	—	5,314
Dust From Material Movement	—	—	—	—	—	19.7	19.7	—	10.1	10.1	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.21	1.99	1.90	< 0.005	0.09	—	0.09	0.08	—	0.08	—	334	334	0.01	< 0.005	—	335
Dust From Material Movement	—	—	—	—	—	1.24	1.24	—	0.64	0.64	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.04	0.36	0.35	< 0.005	0.02	—	0.02	0.01	—	0.01	—	55.2	55.2	< 0.005	< 0.005	—	55.4
Dust From Material Movement	—	—	—	—	—	0.23	0.23	—	0.12	0.12	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.05	0.53	0.00	0.00	0.10	0.10	0.00	0.02	0.02	—	94.2	94.2	< 0.005	< 0.005	0.01	95.6

Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.03	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	6.15	6.15	< 0.005	< 0.005	0.01	6.25
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.02	1.02	< 0.005	< 0.005	< 0.005	1.03
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.3. Rough Grading (2025) - Unmitigated

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

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	3.20	29.7	28.3	0.06	1.23	—	1.23	1.14	—	1.14	—	6,599	6,599	0.27	0.05	—	6,622
Dust From Material Movement	—	—	—	—	—	9.20	9.20	—	3.65	3.65	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.18	1.63	1.55	< 0.005	0.07	—	0.07	0.06	—	0.06	—	362	362	0.01	< 0.005	—	363
Dust From Material Movement	—	—	—	—	—	0.50	0.50	—	0.20	0.20	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.03	0.30	0.28	< 0.005	0.01	—	0.01	0.01	—	0.01	—	59.9	59.9	< 0.005	< 0.005	—	60.1
Dust From Material Movement	—	—	—	—	—	0.09	0.09	—	0.04	0.04	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.08	0.05	0.60	0.00	0.00	0.11	0.11	0.00	0.03	0.03	—	108	108	< 0.005	0.01	0.01	109
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.03	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	6.11	6.11	< 0.005	< 0.005	0.01	6.21
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.01	1.01	< 0.005	< 0.005	< 0.005	1.03
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.5. Fine Grading (2025) - Unmitigated

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

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	3.20	29.7	28.3	0.06	1.23	—	1.23	1.14	—	1.14	—	6,599	6,599	0.27	0.05	—	6,622
Dust From Material Movement	—	—	—	—	—	9.20	9.20	—	3.65	3.65	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.38	3.50	3.34	0.01	0.15	—	0.15	0.13	—	0.13	—	777	777	0.03	0.01	—	780
Dust From Material Movement	—	—	—	—	—	1.08	1.08	—	0.43	0.43	—	—	—	—	—	—	—

Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.07	0.64	0.61	< 0.005	0.03	—	0.03	0.02	—	0.02	—	129	129	0.01	< 0.005	—	129
Dust From Material Movement	—	—	—	—	—	0.20	0.20	—	0.08	0.08	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.09	0.05	0.74	0.00	0.00	0.11	0.11	0.00	0.03	0.03	—	121	121	< 0.005	0.01	0.45	123
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	0.10	0.02	< 0.005	< 0.005	0.02	0.02	< 0.005	0.01	0.01	—	81.3	81.3	< 0.005	0.01	0.20	85.3
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.07	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	13.1	13.1	< 0.005	< 0.005	0.02	13.3
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	9.58	9.58	< 0.005	< 0.005	0.01	10.0
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	2.17	2.17	< 0.005	< 0.005	< 0.005	2.21
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	1.59	1.59	< 0.005	< 0.005	< 0.005	1.66

3.7. Building Construction (2025) - Unmitigated

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

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.13	10.4	13.0	0.02	0.43	—	0.43	0.40	—	0.40	—	2,398	2,398	0.10	0.02	—	2,406
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.13	10.4	13.0	0.02	0.43	—	0.43	0.40	—	0.40	—	2,398	2,398	0.10	0.02	—	2,406
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.41	3.78	4.72	0.01	0.16	—	0.16	0.14	—	0.14	—	867	867	0.04	0.01	—	870
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.07	0.69	0.86	< 0.005	0.03	—	0.03	0.03	—	0.03	—	144	144	0.01	< 0.005	—	144
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.13	0.07	1.13	0.00	0.00	0.16	0.16	0.00	0.04	0.04	—	183	183	0.01	0.01	0.69	186
Vendor	0.01	0.19	0.08	< 0.005	< 0.005	0.03	0.03	< 0.005	0.01	0.01	—	118	118	< 0.005	0.02	0.31	124
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.11	0.08	0.91	0.00	0.00	0.16	0.16	0.00	0.04	0.04	—	163	163	0.01	0.01	0.02	165
Vendor	0.01	0.20	0.09	< 0.005	< 0.005	0.03	0.03	< 0.005	0.01	0.01	—	118	118	< 0.005	0.02	0.01	124
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.04	0.03	0.34	0.00	0.00	0.06	0.06	0.00	0.01	0.01	—	60.9	60.9	< 0.005	< 0.005	0.11	62.0
Vendor	< 0.005	0.07	0.03	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	42.8	42.8	< 0.005	0.01	0.05	44.7
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	< 0.005	0.06	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	10.1	10.1	< 0.005	< 0.005	0.02	10.3
Vendor	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	7.08	7.08	< 0.005	< 0.005	0.01	7.40
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.9. Paving (2025) - Unmitigated

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

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

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.80	7.45	9.98	0.01	0.35	—	0.35	0.32	—	0.32	—	1,511	1,511	0.06	0.01	—	1,517
Paving	0.48	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.09	0.88	1.18	< 0.005	0.04	—	0.04	0.04	—	0.04	—	178	178	0.01	< 0.005	—	179
Paving	0.06	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.16	0.21	< 0.005	0.01	—	0.01	0.01	—	0.01	—	29.5	29.5	< 0.005	< 0.005	—	29.6
Paving	0.01	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.04	0.45	0.00	0.00	0.08	0.08	0.00	0.02	0.02	—	80.7	80.7	< 0.005	< 0.005	0.01	82.0
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Worker	0.01	< 0.005	0.05	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	9.85	9.85	< 0.005	< 0.005	0.02	10.0
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.63	1.63	< 0.005	< 0.005	< 0.005	1.66
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.11. Architectural Coating (2025) - Unmitigated

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

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.13	0.88	1.14	< 0.005	0.03	—	0.03	0.03	—	0.03	—	134	134	0.01	< 0.005	—	134
Architectural Coatings	48.7	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.06	0.07	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	8.41	8.41	< 0.005	< 0.005	—	8.44
Architectural Coatings	3.07	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	—	1.39	1.39	< 0.005	< 0.005	—	1.40
Architectural Coatings	0.56	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.02	0.18	0.00	0.00	0.03	0.03	0.00	0.01	0.01	—	—	32.5	32.5	< 0.005	< 0.005	< 0.005	33.0
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	—	2.12	2.12	< 0.005	< 0.005	< 0.005	2.16
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	—	0.35	0.35	< 0.005	< 0.005	< 0.005	0.36
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	—	0.00	0.00	0.00	0.00	0.00	0.00

3.13. Underground (2025) - Unmitigated

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

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	2.34	21.8	22.1	0.05	0.88	—	0.88	0.81	—	0.81	—	5,516	5,516	0.22	0.04	—	5,535
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	2.34	21.8	22.1	0.05	0.88	—	0.88	0.81	—	0.81	—	5,516	5,516	0.22	0.04	—	5,535
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.28	2.56	2.60	0.01	0.10	—	0.10	0.10	—	0.10	—	650	650	0.03	0.01	—	652
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.05	0.47	0.48	< 0.005	0.02	—	0.02	0.02	—	0.02	—	108	108	< 0.005	< 0.005	—	108
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.10	0.05	0.84	0.00	0.00	0.12	0.12	0.00	0.03	0.03	—	136	136	< 0.005	0.01	0.51	139

Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.08	0.06	0.68	0.00	0.00	0.12	0.12	0.00	0.03	0.03	—	121	121	0.01	0.01	0.01	123
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.08	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	14.8	14.8	< 0.005	< 0.005	0.03	15.0
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	2.45	2.45	< 0.005	< 0.005	< 0.005	2.49
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

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

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

Single Family Housing	3.05	2.11	17.3	0.04	0.03	2.81	2.84	0.03	0.71	0.74	—	3,652	3,652	0.19	0.20	13.3	3,728
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
City Park	< 0.005	< 0.005	0.02	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	5.60	5.60	< 0.005	< 0.005	0.02	5.71
Total	3.05	2.12	17.3	0.04	0.03	2.82	2.85	0.03	0.71	0.74	—	3,657	3,657	0.19	0.20	13.3	3,734
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	2.66	2.41	16.0	0.03	0.03	2.81	2.84	0.03	0.71	0.74	—	3,353	3,353	0.23	0.21	0.34	3,422
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
City Park	< 0.005	< 0.005	0.02	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	5.13	5.13	< 0.005	< 0.005	< 0.005	5.23
Total	2.66	2.42	16.0	0.03	0.03	2.82	2.85	0.03	0.71	0.74	—	3,359	3,359	0.23	0.21	0.34	3,428
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	0.48	0.40	2.77	0.01	0.01	0.49	0.50	< 0.005	0.13	0.13	—	556	556	0.03	0.03	0.93	568
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
City Park	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.46	0.46	< 0.005	< 0.005	< 0.005	0.47
Total	0.48	0.40	2.77	0.01	0.01	0.50	0.50	< 0.005	0.13	0.13	—	557	557	0.03	0.03	0.93	568

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

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

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	439	439	0.07	0.01	—	443
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
City Park	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	439	439	0.07	0.01	—	443
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	439	439	0.07	0.01	—	443
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
City Park	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	439	439	0.07	0.01	—	443
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	72.6	72.6	0.01	< 0.005	—	73.4
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
City Park	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	72.6	72.6	0.01	< 0.005	—	73.4

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

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

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	0.05	0.83	0.35	0.01	0.07	—	0.07	0.07	—	0.07	—	1,048	1,048	0.09	< 0.005	—	1,050
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
City Park	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.05	0.83	0.35	0.01	0.07	—	0.07	0.07	—	0.07	—	1,048	1,048	0.09	< 0.005	—	1,050
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	0.05	0.83	0.35	0.01	0.07	—	0.07	0.07	—	0.07	—	1,048	1,048	0.09	< 0.005	—	1,050
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
City Park	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.05	0.83	0.35	0.01	0.07	—	0.07	0.07	—	0.07	—	1,048	1,048	0.09	< 0.005	—	1,050
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	0.01	0.15	0.06	< 0.005	0.01	—	0.01	0.01	—	0.01	—	173	173	0.02	< 0.005	—	174
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
City Park	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00

Total	0.01	0.15	0.06	< 0.005	0.01	—	0.01	0.01	—	0.01	—	173	173	0.02	< 0.005	—	174
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4.3. Area Emissions by Source

4.3.1. Unmitigated

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

Source	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	2.13	1.01	19.3	0.07	2.76	—	2.76	2.66	—	2.66	457	884	1,341	2.15	< 0.005	—	1,395
Consumer Products	3.53	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.31	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscaping Equipment	0.43	0.05	4.76	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	12.7	12.7	< 0.005	< 0.005	—	12.8
Total	6.40	1.05	24.0	0.07	2.76	—	2.76	2.66	—	2.66	457	897	1,354	2.15	< 0.005	—	1,408
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	2.13	1.01	19.3	0.07	2.76	—	2.76	2.66	—	2.66	457	884	1,341	2.15	< 0.005	—	1,395
Consumer Products	3.53	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.31	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	5.97	1.01	19.3	0.07	2.76	—	2.76	2.66	—	2.66	457	884	1,341	2.15	< 0.005	—	1,395

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	0.09	0.04	0.79	< 0.005	0.11	—	0.11	0.11	—	0.11	17.0	32.9	49.9	0.08	< 0.005	—	51.9
Consumer Products	0.64	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.06	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscaping Equipment	0.04	< 0.005	0.43	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.04	1.04	< 0.005	< 0.005	—	1.04
Total	0.83	0.05	1.22	< 0.005	0.11	—	0.11	0.11	—	0.11	17.0	33.9	50.9	0.08	< 0.005	—	52.9

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

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

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	6.49	29.8	36.3	0.67	0.02	—	57.9
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
City Park	—	—	—	—	—	—	—	—	—	—	0.00	0.09	0.09	< 0.005	< 0.005	—	0.09
Total	—	—	—	—	—	—	—	—	—	—	6.49	29.9	36.3	0.67	0.02	—	58.0
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Single Family Housing	—	—	—	—	—	—	—	—	—	—	6.49	29.8	36.3	0.67	0.02	—	57.9
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
City Park	—	—	—	—	—	—	—	—	—	—	0.00	0.09	0.09	< 0.005	< 0.005	—	0.09
Total	—	—	—	—	—	—	—	—	—	—	6.49	29.9	36.3	0.67	0.02	—	58.0
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	1.07	4.93	6.00	0.11	< 0.005	—	9.58
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
City Park	—	—	—	—	—	—	—	—	—	—	0.00	0.01	0.01	< 0.005	< 0.005	—	0.02
Total	—	—	—	—	—	—	—	—	—	—	1.07	4.94	6.02	0.11	< 0.005	—	9.60

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

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

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	40.2	0.00	40.2	4.02	0.00	—	141
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
City Park	—	—	—	—	—	—	—	—	—	—	0.02	0.00	0.02	< 0.005	0.00	—	0.07

Total	—	—	—	—	—	—	—	—	—	—	40.3	0.00	40.3	4.02	0.00	—	141
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	40.2	0.00	40.2	4.02	0.00	—	141
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
City Park	—	—	—	—	—	—	—	—	—	—	0.02	0.00	0.02	< 0.005	0.00	—	0.07
Total	—	—	—	—	—	—	—	—	—	—	40.3	0.00	40.3	4.02	0.00	—	141
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	6.66	0.00	6.66	0.67	0.00	—	23.3
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
City Park	—	—	—	—	—	—	—	—	—	—	< 0.005	0.00	< 0.005	< 0.005	0.00	—	0.01
Total	—	—	—	—	—	—	—	—	—	—	6.67	0.00	6.67	0.67	0.00	—	23.3

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

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

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.17	1.17

City Park	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.17	1.17
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.17	1.17
City Park	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.17	1.17
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.19	0.19
City Park	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.19	0.19

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

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

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

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

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

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

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

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

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

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

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

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

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

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

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

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

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

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

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

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

Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

5. Activity Data

5.1. Construction Schedule

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase	Phase Description
Mobilization & Preparation	Site Preparation	1/1/2025	1/31/2025	5.00	23.0	—
Rough Grading	Grading	2/1/2025	2/28/2025	5.00	20.0	—
Fine Grading	Grading	5/1/2025	6/30/2025	5.00	43.0	—
Building Construction	Building Construction	7/1/2025	12/31/2025	5.00	132	—
Paving	Paving	10/1/2025	11/30/2025	5.00	43.0	—
Architectural Coating	Architectural Coating	12/1/2025	12/31/2025	5.00	23.0	—
Underground	Trenching	3/1/2025	4/30/2025	5.00	43.0	—

5.2. Off-Road Equipment

5.2.1. Unmitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Mobilization & Preparation	Rubber Tired Dozers	Diesel	Average	3.00	8.00	367	0.40
Mobilization & Preparation	Tractors/Loaders/Backhoes	Diesel	Average	4.00	8.00	84.0	0.37
Rough Grading	Graders	Diesel	Average	1.00	8.00	148	0.41
Rough Grading	Excavators	Diesel	Average	2.00	8.00	36.0	0.38
Rough Grading	Tractors/Loaders/Backhoes	Diesel	Average	2.00	8.00	84.0	0.37
Rough Grading	Scrapers	Diesel	Average	2.00	8.00	423	0.48
Rough Grading	Rubber Tired Dozers	Diesel	Average	1.00	8.00	367	0.40
Fine Grading	Graders	Diesel	Average	1.00	8.00	148	0.41
Fine Grading	Excavators	Diesel	Average	2.00	8.00	36.0	0.38
Fine Grading	Tractors/Loaders/Backhoes	Diesel	Average	2.00	8.00	84.0	0.37
Fine Grading	Scrapers	Diesel	Average	2.00	8.00	423	0.48
Fine Grading	Rubber Tired Dozers	Diesel	Average	1.00	8.00	367	0.40
Building Construction	Forklifts	Diesel	Average	3.00	8.00	82.0	0.20
Building Construction	Generator Sets	Diesel	Average	1.00	8.00	14.0	0.74
Building Construction	Cranes	Diesel	Average	1.00	7.00	367	0.29
Building Construction	Welders	Diesel	Average	1.00	8.00	46.0	0.45
Building Construction	Tractors/Loaders/Backhoes	Diesel	Average	3.00	7.00	84.0	0.37
Paving	Pavers	Diesel	Average	2.00	8.00	81.0	0.42
Paving	Paving Equipment	Diesel	Average	2.00	8.00	89.0	0.36
Paving	Rollers	Diesel	Average	2.00	8.00	36.0	0.38
Architectural Coating	Air Compressors	Diesel	Average	1.00	6.00	37.0	0.48

Underground	Tractors/Loaders/Backhoes	Diesel	Average	2.00	8.00	84.0	0.37
Underground	Scrapers	Diesel	Average	2.00	8.00	423	0.48
Underground	Rough Terrain Forklifts	Diesel	Average	1.00	8.00	96.0	0.40
Underground	Graders	Diesel	Average	1.00	8.00	148	0.41
Underground	Plate Compactors	Diesel	Average	1.00	8.00	8.00	0.43
Underground	Pumps	Diesel	Average	1.00	8.00	11.0	0.74
Underground	Generator Sets	Diesel	Average	1.00	8.00	14.0	0.74

5.3. Construction Vehicles

5.3.1. Unmitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Mobilization & Preparation	—	—	—	—
Mobilization & Preparation	Worker	17.5	7.70	LDA,LDT1,LDT2
Mobilization & Preparation	Vendor	—	4.00	HHDT,MHDT
Mobilization & Preparation	Hauling	0.00	20.0	HHDT
Mobilization & Preparation	Onsite truck	—	—	HHDT
Rough Grading	—	—	—	—
Rough Grading	Worker	20.0	7.70	LDA,LDT1,LDT2
Rough Grading	Vendor	—	4.00	HHDT,MHDT
Rough Grading	Hauling	0.00	20.0	HHDT
Rough Grading	Onsite truck	—	—	HHDT
Building Construction	—	—	—	—
Building Construction	Worker	30.2	7.70	LDA,LDT1,LDT2
Building Construction	Vendor	8.98	4.00	HHDT,MHDT
Building Construction	Hauling	0.00	20.0	HHDT
Building Construction	Onsite truck	—	—	HHDT

Paving	—	—	—	—
Paving	Worker	15.0	7.70	LDA,LDT1,LDT2
Paving	Vendor	—	4.00	HHDT,MHDT
Paving	Hauling	0.00	20.0	HHDT
Paving	Onsite truck	—	—	HHDT
Architectural Coating	—	—	—	—
Architectural Coating	Worker	6.05	7.70	LDA,LDT1,LDT2
Architectural Coating	Vendor	—	4.00	HHDT,MHDT
Architectural Coating	Hauling	0.00	20.0	HHDT
Architectural Coating	Onsite truck	—	—	HHDT
Underground	—	—	—	—
Underground	Worker	22.5	7.70	LDA,LDT1,LDT2
Underground	Vendor	—	4.00	HHDT,MHDT
Underground	Hauling	0.00	20.0	HHDT
Underground	Onsite truck	—	—	HHDT
Fine Grading	—	—	—	—
Fine Grading	Worker	20.0	7.70	LDA,LDT1,LDT2
Fine Grading	Vendor	—	4.00	HHDT,MHDT
Fine Grading	Hauling	1.16	20.0	HHDT
Fine Grading	Onsite truck	—	—	HHDT

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

Non-applicable. No control strategies activated by user.

5.5. Architectural Coatings

Phase Name	Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
Architectural Coating	331,695	110,565	0.00	0.00	20,438

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (cy)	Material Exported (cy)	Acres Graded (acres)	Material Demolished (sq. ft.)	Acres Paved (acres)
Mobilization & Preparation	—	—	34.5	0.00	—
Rough Grading	—	—	60.0	0.00	—
Fine Grading	400	—	129	0.00	—
Paving	0.00	0.00	0.00	0.00	8.75

5.6.2. Construction Earthmoving Control Strategies

Non-applicable. No control strategies activated by user.

5.7. Construction Paving

Land Use	Area Paved (acres)	% Asphalt
Single Family Housing	0.93	0%
Other Asphalt Surfaces	7.82	100%
City Park	0.00	0%

5.8. Construction Electricity Consumption and Emissions Factors

kWh per Year and Emission Factor (lb/MWh)

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

5.9. Operational Mobile Sources

5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
Single Family Housing	793	801	718	285,970	3,935	3,977	3,564	1,419,186
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
City Park	0.32	0.80	0.90	172	2.20	5.53	6.17	1,183

5.10. Operational Area Sources

5.10.1. Hearths

5.10.1.1. Unmitigated

Hearth Type	Unmitigated (number)
Single Family Housing	—
Wood Fireplaces	0
Gas Fireplaces	42
Propane Fireplaces	0
Electric Fireplaces	0
No Fireplaces	42
Conventional Wood Stoves	0
Catalytic Wood Stoves	4
Non-Catalytic Wood Stoves	4
Pellet Wood Stoves	0

5.10.2. Architectural Coatings

Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
331695	110,565	0.00	0.00	20,438

5.10.3. Landscape Equipment

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

5.11. Operational Energy Consumption

5.11.1. Unmitigated

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

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Single Family Housing	785,113	204	0.0330	0.0040	3,268,635
Other Asphalt Surfaces	0.00	204	0.0330	0.0040	0.00
City Park	0.00	204	0.0330	0.0040	0.00

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Single Family Housing	3,384,864	16,507,246
Other Asphalt Surfaces	0.00	0.00
City Park	0.00	66,440

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Single Family Housing	74.7	—
Other Asphalt Surfaces	0.00	—
City Park	0.04	—

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
Single Family Housing	Average room A/C & Other residential A/C and heat pumps	R-410A	2,088	< 0.005	2.50	2.50	10.0
Single Family Housing	Household refrigerators and/or freezers	R-134a	1,430	0.12	0.60	0.00	1.00
City Park	Other commercial A/C and heat pumps	R-410A	2,088	< 0.005	4.00	4.00	18.0
City Park	Stand-alone retail refrigerators and freezers	R-134a	1,430	0.04	1.00	0.00	1.00

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
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5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

Equipment Type	Fuel Type	Number per Day	Hours per Day	Hours per Year	Horsepower	Load Factor
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5.16.2. Process Boilers

Equipment Type	Fuel Type	Number	Boiler Rating (MMBtu/hr)	Daily Heat Input (MMBtu/day)	Annual Heat Input (MMBtu/yr)
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5.17. User Defined

Equipment Type	Fuel Type
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5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres
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5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres
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5.18.2. Sequestration

5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)
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7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

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

Indicator	Result for Project Census Tract
Exposure Indicators	—
AQ-Ozone	82.5
AQ-PM	95.9
AQ-DPM	57.1
Drinking Water	84.4
Lead Risk Housing	77.0
Pesticides	71.6
Toxic Releases	74.9
Traffic	35.3
Effect Indicators	—
CleanUp Sites	77.3
Groundwater	44.8
Haz Waste Facilities/Generators	94.1
Impaired Water Bodies	0.00
Solid Waste	78.1
Sensitive Population	—
Asthma	98.2
Cardio-vascular	94.6
Low Birth Weights	99.8
Socioeconomic Factor Indicators	—
Education	90.9
Housing	96.4
Linguistic	78.7
Poverty	95.4

Unemployment	97.3
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8. User Changes to Default Data

Screen	Justification
Land Use	84 single-family residential units = 5.28-acres Hardscape/road (including 22 guest parking spaces) = 2.13 acres Park/open space = 0.36 acres Landscaping = 0.05 acres (2,178-SF) Total Site = 7.82 acres
Construction: Construction Phases	Vacant site, no demolition
Construction: Off-Road Equipment	Underground equipment based on CalEEMod defaults for .5 miles of linear construction "Drainage, Utilities & Sub-Grade"

APPENDIX B

CDFW CNDDDB Query Results



Selected Elements by Scientific Name

California Department of Fish and Wildlife

California Natural Diversity Database



Query Criteria: Quad (Herndon (3611978) OR Fresno North (3611977) OR Clovis (3611976) OR Kearney Park (3611968) OR Fresno South (3611967) OR Malaga (3611966) OR Raisin (3611958) OR Caruthers (3611957) OR Conejo (3611956))

Table with 7 columns: Species, Element Code, Federal Status, State Status, Global Rank, State Rank, Rare Plant Rank/CDFW SSC or FP. Rows include species like Agelaius tricolor, Ambystoma californiense pop. 1, Anniella pulchra, etc.



Selected Elements by Scientific Name
California Department of Fish and Wildlife
California Natural Diversity Database



Species	Element Code	Federal Status	State Status	Global Rank	State Rank	Rare Plant Rank/CDFW SSC or FP
<i>Emys marmorata</i> western pond turtle	ARAAD02030	Proposed Threatened	None	G3G4	S3	SSC
<i>Eriastrum hooveri</i> Hoover's eriastrum	PDPLM03070	Delisted	None	G3	S3	4.2
<i>Eumops perotis californicus</i> western mastiff bat	AMACD02011	None	None	G4G5T4	S3S4	SSC
<i>Imperata brevifolia</i> California satintail	PMPOA3D020	None	None	G3	S3	2B.1
<i>Lasiurus cinereus</i> hoary bat	AMACC05032	None	None	G3G4	S4	
<i>Lasthenia chrysantha</i> alkali-sink goldfields	PDAST5L030	None	None	G2	S2	1B.1
<i>Leptosiphon serrulatus</i> Madera leptosiphon	PDPLM09130	None	None	G3	S3	1B.2
<i>Linderiella occidentalis</i> California linderiella	ICBRA06010	None	None	G2G3	S2S3	
<i>Lytta molesta</i> molestan blister beetle	IICOL4C030	None	None	G2	S2	
<i>Metapogon hurdi</i> Hurd's metapogon robberfly	IIDIP08010	None	None	G1G2	S1S2	
<i>Nannopterum auritum</i> double-crested cormorant	ABNFD01020	None	None	G5	S4	WL
<i>Northern Claypan Vernal Pool</i> Northern Claypan Vernal Pool	CTT44120CA	None	None	G1	S1.1	
<i>Nycticorax nycticorax</i> black-crowned night heron	ABNGA11010	None	None	G5	S4	
<i>Orcuttia inaequalis</i> San Joaquin Valley Orcutt grass	PMPOA4G060	Threatened	Endangered	G1	S1	1B.1
<i>Orcuttia pilosa</i> hairy Orcutt grass	PMPOA4G040	Endangered	Endangered	G1	S1	1B.1
<i>Perognathus inornatus</i> San Joaquin pocket mouse	AMAFD01060	None	None	G2G3	S2S3	
<i>Phrynosoma blainvillii</i> coast horned lizard	ARACF12100	None	None	G4	S4	SSC
<i>Sagittaria sanfordii</i> Sanford's arrowhead	PMALI040Q0	None	None	G3	S3	1B.2
<i>Spea hammondi</i> western spadefoot	AAABF02020	Proposed Threatened	None	G2G3	S3S4	SSC
<i>Taxidea taxus</i> American badger	AMAJF04010	None	None	G5	S3	SSC
<i>Thamnophis gigas</i> giant gartersnake	ARADB36150	Threatened	Threatened	G2	S2	



Selected Elements by Scientific Name
California Department of Fish and Wildlife
California Natural Diversity Database



Species	Element Code	Federal Status	State Status	Global Rank	State Rank	Rare Plant Rank/CDFW SSC or FP
<i>Tuctoria greenei</i> Greene's tuctoria	PMPOA6N010	Endangered	Rare	G1	S1	1B.1
<i>Vireo bellii pusillus</i> least Bell's vireo	ABPBW01114	Endangered	Endangered	G5T2	S3	
<i>Vulpes macrotis mutica</i> San Joaquin kit fox	AMAJA03041	Endangered	Threatened	G4T2	S3	

Record Count: 43

APPENDIX C

Vehicle Miles Travelled Results

City of Fresno

URBAN FORM VMT CALCULATOR

Basic Information

Project Name:

Applicant/Developer:

Major Cross Streets:

Project Address:

APN(s):

Gross Project Site Area: acres

Baseline VMT from COG Calculator: per capita

Calculation Run By:

Date of Calculation:

Land Use Information

Area dedicated to internal streets (<i>including major streets which are entirely within the project site</i>):	2.2	acres
Area of park space or other public open space:	0.2	acres
Area of landscaping outlots and other space that will not be available for residential and commercial uses:	0.3	acres
Net area of the project site (<i>land available for residential and commercial uses</i>):	5.1	acres
Number of single family dwellings (<i>attached and detached</i>):	84.0	units
Number of multifamily dwellings (<i>including ADUs and duplexes</i>):	0.0	units
Total number of dwellings:	84.0	units
Number of affordable/BMR dwellings (<i>including single-family and multifamily</i>):	0.0	units
Total office space within project:		square feet
Total retail and other non-residential space within the project (<i>excluding office and industrial</i>):		square feet
Average Front Setback of Residential Structures:	18.0	feet
Average Front Setback of Non-Residential Structures:		feet
Number of driveways serving residential uses:	84.0	driveways
Number of driveways serving non-residential uses:		driveways
Number of dwelling units without dedicated parking:	0.0	units
Number of single family dwelling units with alley loaded parking:	0.0	units
Number of single family dwelling units with recessed garages:	64.0	units
Number of pedestrian entrances into project buildings which face a street and are located within 20 feet of a sidewalk:	0.0	entrances

Project Perimeter and Major Street Connections

Length of project frontage that is adjacent to major streets <i>(including major streets adjacent to the project or within the project)</i> :	0.0	feet
Length of project perimeter that is adjacent to other sites <i>(developed or undeveloped)</i> :	2,340.5	feet
Total Length of project perimeter:	2,340.5	feet
Are there residential uses adjacent to non-residential uses <i>(including those inside and at the edge of the project, and including instances where a non-major street is the boundary)</i> :	Yes	
Length of the boundary between residential uses non-residential uses <i>(including those inside and at the edge of the project, and including instances where a non-major street is the boundary)</i> :	541.0	feet
Length of project perimeter that is adjacent to major streets that is occupied by residential uses:	0.0	
Length of project perimeter that is adjacent to major streets that is occupied by non-residential uses:	0.0	
Total number of ungated pedestrian connections <i>(a single street with 2 sidewalks counts as 1)</i> from residential part of project to adjacent non-residential use (including those inside and outside of the project):	0.0	connections
Total number of ungated automobile connections from the residential part of project to adjacent non-residential uses <i>(including those inside and outside of the project)</i> :	0.0	connections
Total number of ungated pedestrian connections <i>(a single street with 2 sidewalks counts as 1)</i> from project to adjacent development sites:	0.0	connections
Total number of ungated automobile connections from project to adjacent development sites:	0.0	connections
Total number of ungated pedestrian connections (a single street with 2 sidewalks counts as 1) from project to adjacent major streets:	0.0	connections
Total number of ungated automobile connections from project to adjacent major streets:	0.0	connections
Total number of controlled intersections on adjacent major streets:	0.0	intersections

Distance between the transit stop serving the project and the nearest pedestrian connection to the project (following safe and legal pedestrian paths, not as the crow flies).

150.0

feet

Total length of all major streets within the project (if applicable):

0.0

feet

Total length of all major streets, within the project and at the perimeter:

0.0

feet

Length of major street frontage with tall fencing (over 4 feet in height) or soundwalls:

0.0

feet

Average width of sidewalks on major streets, within the project and at the perimeter:

0.0

feet

Total length in feet of all protected bike lanes and off-street trails:

0.0

feet

Internal System of Minor Streets

Does the project have internal minor streets
(include public and private streets)?

Yes

If "No" leave the remaining cells blank and scroll down to see results of Urban Form VMT analysis.

Total length of internal streets (excluding intersections,
and excluding major streets):

2,392.0

feet

Total length of Residential Lot Frontage Facing Internal
Streets:

4,600.0

feet

Total length of Non-Residential Lot Frontage Facing
Internal Streets:

200.0

feet

Total length of all Lot Frontage Facing Internal Streets:

4,800.0

feet

Average block length (This is based on streets, not
frontages. Measure the length of each block along the
centerline of each street between intersections. To count
as an intersection there must be at least three
approaches—elbows do not count. Streets which stub off
at the border of the subdivision cannot be counted as a
block because the distance to the next intersection is
unknown):

359.0

feet

Average local street roadway width:

35.3

feet

Total number of intersections in project
(including those that connect to adjacent major streets):

6.0

intersections

Length of internal streets with two sidewalks:

110.0

feet

Length of internal streets with one sidewalk:

0.0

feet

Length of internal streets with no sidewalks:

2,282.0

feet

Total length of all sidewalks within project:

220.0

feet

Average residential sidewalk width:

7.5

feet

Average non-residential sidewalk width:

0.0

feet

Length of internal streets with parkway strips
(4 feet or wider):

110.0

feet

Total number of street trees
(only include those planted within the street right of way):

0.0

trees

Average diameter of street tree canopy, or spread, at
maturity:

0.0

feet

Total number of pedestrian-scaled street lights
(18' feet high or less, within street right of way but not
projecting over the roadway):

2.0

lights

Results of Urban Form VMT Analysis

Type of Project:

Residential Project

Baseline VMT For this Location (from COG model):

14.70

per capita

The urban form of this project warrants a VMT reduction
of:

5.00%

The adjusted VMT for this project is:

13.96

per capita

The the regional VMT threshold is:

14.01

per capita

This project exceeds exceeds the local VMT threshold by:

0.00

per capita

After analysis of its urban form, does this project still have
a VMT impact which must be mitigated through a fee or
other meaasure?

NO

APPENDIX D

DTSC Letter 12/27/24



Yana Garcia
Secretary for
Environmental Protection



Department of Toxic Substances Control

Katherine M. Butler, MPH, Director
8800 Cal Center Drive
Sacramento, California 95826-3200
dtsc.ca.gov



Gavin Newsom
Governor

SENT VIA ELECTRONIC MAIL

December 27, 2024

Rob Holt
Supervising Planner
City of Fresno
2600 Fresno Street 3rd Floor, Room 3043
Fresno, CA 93721
Robert.Holt@fresno.gov

RE: MITIGATED NEGATIVE DECLARATION FOR ENVIRONMENTAL ASSESSMENT
NO. T-6468/P23-04061 DATED DECEMBER 16, 2024, STATE CLEARINGHOUSE
NUMBER [2024120649](#)

Dear Rob Holt,

The Department of Toxic Substances Control (DTSC) reviewed the Mitigated Negative Declaration (MND) for Environmental Assessment No. T-6468/P23-04061 project (project). The applicant is proposing a gated residential community in the southwest portion of Fresno that would include 84 residential units distributed amongst 74 two-story buildings, a 0.16-acre park, and 22 guest parking spaces on a 7.82-acre site. The project proposes to subdivide the existing parcel into 84 residential lots ranging in size from 1,866 square feet to 3,745 square feet and 3 open space lots for a total of 87 lots. The tentative tract map would be recorded in two phases, with 45 lots, including two open space lots and a gated entry, in Phase 1, and 42 lots, including one open space lot, in Phase 2. The project would not require the removal or demolition of any existing buildings or structures on the site. DTSC recommends and requests consideration of the following comments:

1. DTSC recommends that all imported soil and fill material should be tested to assess any contaminants of concern meet screening levels as outlined in

[DTSC's Preliminary Endangerment Assessment \(PEA\) Guidance Manual](#).

Additionally, DTSC advises referencing the [DTSC Information Advisory Clean Imported Fill Material Fact Sheet](#) if importing fill is necessary. To minimize the possibility of introducing contaminated soil and fill material there should be documentation of the origins of the soil or fill material and, if applicable, sampling be conducted to ensure that the imported soil and fill material are suitable for the intended land use. The soil sampling should include analysis based on the source of the fill and knowledge of prior land use. Additional information can be found by visiting [DTSC's Human and Ecological Risk Office \(HERO\) webpage](#).

DTSC appreciates the opportunity to comment on the MND for the Environmental Assessment No. T-6468/P23-04061 project. Thank you for your assistance in protecting California's people and environment from the harmful effects of toxic substances. If you have any questions or would like clarification on DTSC's comments, please respond to this letter or via [email](#) for additional guidance.

Sincerely,



Dave Kereazis
Associate Environmental Planner
HWMP-Permitting Division – CEQA Unit
Department of Toxic Substances Control
Dave.Kereazis@dtsc.ca.gov

Rob Holt
December 27, 2024
Page 3

cc: (via email)

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