

Exhibit J

APPENDIX G/INITIAL STUDY FOR A MITIGATED NEGATIVE DECLARATION

**Environmental Checklist Form for:
Development Permit Application No. P25-01774
Rezone Application No. P25-01778**

1.	<p>Project title: Stock Five Granite Park PACE Facility Rezone Application No. P25-01778 Development Permit Application No. P25-01774</p>
2.	<p>Lead agency name and address: City of Fresno Planning and Development Department 2600 Fresno Street Fresno, CA 93721</p>
3.	<p>Contact person and phone number: Valeria Ramirez, Planner II City of Fresno Planning and Development Department (559) 621-8046</p>
4.	<p>Project location: The proposed Project is located at 4092 N. Cedar Avenue, Fresno, CA 93726. The proposed Project site is located at the southeast corner of N. Cedar Avenue and E. Hampton Way. (APNs: 438-220-01, -09, and -10)</p>
5.	<p>Project sponsor's name and address: Adam Wong Stock Five Holdings, LLC 2972 Larkin Avenue Clovis, CA 93612</p>
6.	<p>General & Community plan land use designation: Existing: Office Proposed: Office</p>
7.	<p>Zoning: Existing: O/cz (<i>Office/conditions of zoning</i>) Proposed: O (<i>Office/conditions of zoning</i>) Note: The proposed rezone application seeks to remove the zoning condition that prohibits the operation of an Adult Daycare Facility. All other zoning conditions would remain in place.</p>

8.

Description of project:

Rezone Application No. P25-01778 and Development Permit Application No. P25-01774 was filed by Stock Five Development, Inc. The applicant proposes to develop a 20,000 sq. ft. one-story healthcare facility at 4092 N. Cedar Ave located in the City of Fresno. The proposed Project would consist of a Program of All-Inclusive Care (“PACE”) facility serving seniors in the community offering community-based services and medical care services to individuals aged 55 and over who have been categorized as "nursing home eligible" by the state's Medicaid program.

The proposed Project would comply with the most recently adopted CALGreen Code Tier 2 requirements related to the provision of off-street electric vehicle (EV) parking spaces. Under CALGreen Tier 2 requirements, the proposed Project would be required to provide EV parking spaces in accordance with the following table found in the CALGreen Code:

Total Number of Actual Parking Spaces	Tier 2 Number of Required EV Capable Spaces	Tier 2 Number of EVCS (EV Capable Spaces Provides with EVSE) ²
0-9	3	0
10-25	8	3
26-50	17	6
51-75	28	9
76-100	40	13
101-150	57	19
151-200	79	26
201 and over	45 percent of total parking spaces ¹	33 percent of EV capable spaces ¹

1. Calculation for spaces shall be rounded up to the nearest whole number.
2. The number of required EVCS (EV Capable Spaces Provides with EVSE) in column three (3) count toward total number of required EV capable spaces shown in column two (2).

The proposed Project would provide a viable alternative to nursing home placement for such patients by delivering care through a comprehensive service package of medical, behavioral, and social services that enables patients to stay in their own homes and communities.

The community-based services would include rehabilitation therapies (physical therapy, occupational therapy, speech therapy), engagement programs promoting socialization among seniors, nutritional support services including counseling and meals, and counseling services.

The medical care services would include medical care from doctors and advance practice providers, nursing and medication services, dentistry care, podiatry care, optometry care, and audiology care. The proposed Project would not include any

overnight services, and all patients will be returned to their homes via private van service at the end of each day.

The PACE center would follow the care model described above, providing comprehensive healthcare services for senior citizens in the City of Fresno.

Rezone Application No. P25-01778 is necessary to remove a condition of zoning that precludes the proposed use from occupying the site.

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

	Planned Land Use	Existing Zoning	Existing Land Use
North	Medium Density Residential	RS-5: Residential Single-Family, Medium Density	Single Family Residential
East	Office Recreation	O/cz: Office CRC/cz: Commercial Recreation	Offices Granite Park
South	Office Recreation	O: Office CRC/cz: Commercial Recreation	Offices Commercial buildings
West	Medium Density Residential	RS-5: Residential Single-Family, Medium Density	Single Family Residential
cz: conditions of zoning			

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

- Fresno Metropolitan Flood Control District

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

The State requires lead agencies to consider the potential effects of proposed Projects and consult with California Native American tribes during the local planning process for the purpose of protecting Traditional Tribal Cultural Resources through the California Environmental Quality Act (CEQA) Guidelines. Pursuant to PRC Section 21080.3.1, before public distribution of the document, the lead agency shall begin consultation with the California Native American tribe that is traditionally and culturally affiliated with the geographical area of the proposed Project. Such significant cultural resources are either sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a tribe which is either on or eligible for inclusion in the California

Historic Register or local historic register, or, the lead agency, at its discretion, and support by substantial evidence, choose to treat the resources as a Tribal Cultural Resources (PRC Section 21074(a)(1-2)). According to the most recent census data, California is home to 109 currently recognized Indian tribes. Tribes in California currently have nearly 100 separate reservations or Rancherias. Fresno County has a number of Rancherias such as Table Mountain Rancheria, Millerton Rancheria, Big Sandy Rancheria, Cold Springs Rancheria, and Squaw Valley Rancheria. These Rancherias are not located within the city limits.

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

Currently, the Table Mountain Rancheria Tribe and the Dumna Wo Wah Tribe have requested to be notified pursuant to Assembly Bill 52 (AB 52). A certified letter was mailed to the above-mentioned tribes on July 30, 2025. The 30-day comment period ended on August 29, 2025. Both tribes did not request consultation.

Under invitations to consult under AB 52, no tribes elected to consult on the proposed Project under AB 52 guidelines. Mitigation Measure CUL-2, for the protection of tribal cultural resources, is included in the Project Specific Mitigation Monitoring Checklist dated October 2025, as recommended by the Table Mountain Rancheria Tribe.

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 type="checkbox"/> Air Quality	<input type="checkbox"/> Biological Resources
<input type="checkbox"/> Cultural Resources	<input type="checkbox"/> Energy
<input 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 type="checkbox"/>	Tribal Cultural Resources
<input type="checkbox"/>	Utilities/Service Systems	<input type="checkbox"/>	Wildfire
<input 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.

Valeria Ramirez
Valeria Ramirez, Planner II

12/18/2025

Date

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 would 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 the potential impact would be 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 would be less than significant.
 - d. "Potentially Significant Impact" means there is substantial evidence that an effect resulting from the proposed Project 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 an 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 approved General Plan identifies six locations along the San Joaquin River bluffs as designated vista points from which views should be maintained. Scenic vistas within the Planning Area could 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 proposed Project site is currently a primarily vacant lot with a portion of it improved with a parking lot. The site is bordered to the north and west by sidewalks and an improved roadway. This roadway intersects with a stop sign for traffic control. To the south and east of the site there exists a parking lot and office buildings. The proposed Project would include the construction of a new building on the empty lot. While the proposed Project would develop a new building, the building would be one-story, consistent with surrounding development. The new PACE facility would have a 20,000 square-foot footprint, but it would be located on a site that is already developed with other offices. The proposed Project site is not located within any of the scenic vista points identified in the General Plan. Furthermore, the construction of the proposed Project would not significantly affect or block a potentially scenic vista in the City. Therefore, the proposed Project would have no impact on a scenic vista.

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

According to the Caltrans State Scenic Highway Mapping System¹, there are no eligible or officially-designated State Scenic Highways within the City of Fresno. However, 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 the county of Madera. Since there are no eligible or officially-designated State Scenic Highways within or in close proximity to the proposed Project site, implementation of the proposed Project would not damage scenic resources within a designated state scenic highway. Therefore, the proposed Project would have no impact.

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

The proposed Project site is currently a primarily vacant lot with a portion of it improved with a parking lot. Surrounding land uses include residential uses to the north and west, commercial to the south, and commercial/park uses to the east. The proposed Project site and surrounding area are characterized by relatively flat topography. There are scattered ornamental trees located along the existing roadways. There are no surface water features located within or adjacent to the proposed Project site. The proposed Project would include the construction of a 20,000-square-foot PACE facility to support non-residential senior facilities and services, in addition to installation of on-

¹ California Department of Transportation. Scenic Highways. Available online at: <https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways> (accessed July 30, 2025)

site landscaping and signage. Although the proposed Project would change the visual characteristics of the proposed Project site by including a new building and minor ancillary improvements, the design of the additions would be consistent and compatible with the visual character of the proposed Project vicinity. The proposed Project would be consistent with Office uses as defined in the City's General Plan, and the proposed Project would be consistent with the level and scale of existing surrounding development and would not introduce new architectural features or other components that could alter the existing visual character of the proposed Project site and surrounding area. Further, proposed on- and off-site improvements would be required to comply with the City Public Works Department Standard Specifications to ensure consistency with City design standards and existing development in the City. Although the characteristics of the proposed Project site would change, the proposed Project would not substantially degrade the visual character or quality of the site and its surroundings. 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 proposed 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 in the form of relocation of existing parking lot lights, and interior lighting visible from building windows. However, new sources of light and glare associated with the proposed Project would not be substantial in the context of existing lighting sources in the proposed Project vicinity. In addition, daytime glare would not be substantial because no highly reflective glass elements or building materials are proposed as part of the proposed Project. Compliance with California Building Code (Title 24, California Code of Regulations) standards address light and glare impacts to day- and night-time views resulting from construction of the proposed Project. Therefore, potential light and glare from the proposed Project would result in a less than significant impact.

Mitigation Measure(s)

Mitigation Measures are not necessary.

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 proposed Project site is located within an urbanized area of the City of Fresno. There are no agricultural uses located within or adjacent to the proposed Project site. Additionally, the site is classified as Urban and Built-Up Land by the State Department of Conservation. Therefore, development of the proposed Project would not convert agricultural land to a non-agricultural use. The proposed Project would not result in the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to a non-agricultural use and there would be no impact.

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

The proposed Project site is designated Office in the General Plan. The proposed Project site is located in the Office zoning district which allows for administrative, financial, business, professional, medical, and public offices which can be found in the Citywide Development Code². The proposed Project site is not subject to a Williamson Act contract. Therefore, development of the proposed Project would not conflict with existing zoning for agricultural use or a Williamson Act contract, and the proposed Project would have no impact.

² City of Fresno. 2016. Fresno Municipal Code Chapter 15: Citywide Development Code. Available online at: https://www.fresno.gov/darm/wp-content/uploads/sites/10/2016/11/Complete_Code_March_2017.pdf (accessed August 14, 2025)

- 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 proposed Project site is located within an existing urban area and is located within the O (Office) zoning district in the City of Fresno. The proposed Project would not conflict with the existing zoning for, or cause rezoning of, forest land or conversion of forest land to non-forest uses. Therefore, the proposed Project would have no impact.

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

Please refer to the discussion for c) above. The proposed Project would not result in the loss of forest land or conversion of forest land to non-forest uses. Therefore, the proposed Project would have 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?**

Please refer to the discussion for a) and c) above. The proposed Project site is located within an existing urban environment and would not result in the conversion of farmland to non-agricultural uses or forest land to non-forest uses. Therefore, the proposed Project would have no impact.

Mitigation Measure

Mitigation Measures are not necessary.

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 2022 Plan for the 2015 8-Hour Ozone Standard in December 2022 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 below³. 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	NO _x	ROG	SO _x	PM ₁₀	PM _{2.5}
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. Guidance for Assessing and Mitigating Air Quality Impacts. Website: <https://www.valleyair.org/transportation/GAMAQI-2015/FINAL-DRAFT-GAMAQI.PDF>. (accessed August 14, 2025)

*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

Construction and operational emissions for the proposed Project were analyzed using the California Emissions Estimator Model version 2020.4.0 (CalEEMod). Model results for construction and operational emissions are shown in Table 2 and Table 3 respectively.

3 San Joaquin Valley Air Pollution Control District. 2015. Air Quality Thresholds of Significance – Criteria Pollutants. Available online at: <http://www.valleyair.org/transportation/0714-GAMAQI-Criteria-Pollutant-Thresholds-of-Significance.pdf> (accessed August 14, 2025)

Table 2: Project Construction Emissions (Tons Per Year)

Project Construction	CO	NO _x	ROG	SO _x	PM ₁₀	PM _{2.5}
Annual Construction Emissions*	1.097	0.929	0.163	0.002	0.057	0.040
SJVAPCD Thresholds	100.0	10.0	10.0	27.0	15.0	15.0
Exceed Threshold?	No	No	No	No	No	No

Source: SJVAPCD. 2015. Guidance for Assessing and Mitigating Air Quality Impacts. Website: <https://www.valleyair.org/transportation/GAMAQI-2015/FINAL-DRAFT-GAMAQI.PDF>. (accessed August 14, 2025)

*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	0.12	<0.005	0.08	<0.005	<0.005	<0.005
Energy Source Emissions	<0.005	0.04	0.03	<0.005	<0.005	<0.005
Mobile Source Emissions	0.10	0.11	0.72	<0.005	0.14	0.04
Total Project Operational Emissions*	0.22	0.15	0.84	<0.005	0.15	0.04
SJVAPCD Significance Threshold	10.0	10.0	100.0	27.0	15.0	15.0
Exceed Threshold?	No	No	No	No	No	No

Source: San Joaquin Valley Air Pollution Control District (SJVAPCD). 2015. Guidance for Assessing and Mitigating Air Quality Impacts. February 19. Website: <https://www.valleyair.org/transportation/GAMAQI-2015/FINAL-DRAFTGAMAQI.PDF>. (accessed August 14, 2025)

*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. Construction emissions would be temporary, localized, and subject to BMPs and applicable air district rules. Operational emissions from facility traffic and energy use would be consistent with land use designations and regional growth assumptions. The proposed Project's contribution would not exceed thresholds or conflict with air quality plans. Therefore, the proposed Project would not result in a cumulatively considerable contribution to a net increase of any criteria pollutant for which the proposed Project region is in non-attainment, and impacts would be less than significant.

c) Expose sensitive receptors to substantial pollutant concentrations?

Construction of the proposed Project may expose surrounding sensitive receptors to airborne particulates, as well as a small quantity of construction equipment pollutants (i.e., usually diesel-fueled vehicles and equipment). Sensitive receptors within 1,000 feet of the proposed Project site include 120 single-family residences and one healthcare facility. The closest sensitive receptors to the proposed Project site are the residences to the north across Hampton Way at 50 feet away. The healthcare facility is located approximately 800 feet away to the north across Hampton Way, Buckingham Way and Ashlan Avenue. Project construction emissions would be above the SJVAPCD significance thresholds, however with the implementation of Mitigation Measure AIR-1, Tier 4 diesel engines of 50 horsepower or larger, or Tier 3 engines with Level 3 Diesel Particulate Filters on diesel engines of 50 horsepower or larger, impacts would be reduced to less than significant. Once constructed, the proposed Project's operational emissions would fall below the SJVAPCD significance thresholds and would not be a significant source of long-term operational emissions. Therefore, sensitive receptors would not be exposed to substantial pollutant concentrations as a result of the proposed Project, and the impact would be less than significant with mitigation.

Mitigation Measure AIR-1: Diesel-powered construction equipment of 50 horsepower or greater shall meet EPA Tier 3 standards and be equipped with a Level 3 diesel particulate filter, or shall meet EPA Tier 4 standards.

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 for extended periods of time beyond the proposed Project site. The potential for diesel odor impacts is therefore considered less than significant. In addition, the proposed uses that would be developed within the proposed 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, such as land uses including agricultural activities, feedlots, wastewater treatment facilities, landfills, or heavy manufacturing uses. The proposed Project would not create

objectionable odors affecting a substantial number of people during project construction or operation, and this impact would be less than significant.

Mitigation Measures

The proposed Project shall implement and incorporate the air quality related mitigation measures as identified in the attached Mitigation Measure Monitoring Program dated October 2025.

AIR-1: Construction of the proposed Project shall utilize EPA Tier 4 engines, or EPA Tier 3 engines with Level 3 Diesel Particulate Filters, on all engines of 50 horsepower or larger.

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 proposed Project site is located in an urbanized area and is currently a primarily vacant lot with a portion of it improved with a parking lot. Due to the urban location and lack of landscaping on the site itself, the proposed Project site does not provide suitable habitat for special-status animal species. Common wildlife species that are adapted to urban environments are expected to continue to use the site and vicinity after redevelopment. The site is not occupied by, or suited for, any special-status species. However, trees within and adjacent to the site can be utilized by migratory nesting birds and burrowing owl (BUOW) can utilize the site for foraging. In order to reduce potential impacts to nesting birds and BUOW the proposed Project will implement six mitigation measures pertaining to the avoidance of any nesting birds and BUOW on-site. With implementation of these mitigation measures, the proposed Project would not result in direct or indirect adverse effects on special-status plants or wildlife, and the impact would be less than significant with mitigation incorporated.

Mitigation Measure BIO-1 Nesting Bird Avoidance: The proposed Project’s construction activities will occur, if feasible, between August 31 and January 31 (outside of the nesting bird season) to avoid impacts to nesting birds.

Mitigation Measure BIO-2 Migratory Nesting Bird Pre-Activity Survey: If activities must occur within the nesting bird season (February 1 to August 31), a qualified biologist will conduct a pre-construction survey for active migratory bird nests no more

than seven (7) days prior to the start of the construction within the proposed Project site and surrounding lands up to 50 feet from the proposed Project site and for active raptor nests within the proposed Project site and all accessible lands up to 450-feet from the proposed Project site. All raptor nests would be considered “active” upon the nest-building stage.

Mitigation Measure BIO-3 Nesting Bird Avoidance Buffers: On discovery of any active nests or breeding colonies near work areas, a qualified biologist should determine appropriate avoidance buffer distances based on applicable CDFW and/or USFWS guidelines, the biology of the species, conditions of the nest(s), and the level of Project disturbance. If needed, avoidance buffers should be identified with flagging, fencing, or other easily visible means, and should be maintained until the biologist has determined that the nestlings have fledged.

Mitigation Measure BIO-4 BUOW Pre-Activity Survey: A qualified biologist (someone familiar with the identification and sign of this species) will conduct a pre-construction take avoidance survey for BUOW and suitable burrows, in accordance with CDFW’s Staff Report on Burrowing Owl Mitigation (2012), within seven (7) days prior to the start of construction activities. The survey will include the proposed work area and surrounding lands up to 500 feet. If construction is delayed or halted for more than seven (7) days, another pre-construction survey for BUOW will be conducted. If no BUOW individuals or active burrows are observed, no further mitigation is required.

Mitigation Measure BIO-5 BUOW Avoidance Buffers: If an active BUOW burrow is detected, avoidance buffers will be implemented. A qualified biologist will determine appropriate avoidance buffer distances based on CDFW’s 2012 Staff Report on Burrowing Owl Mitigation, the biology of BUOW, conditions of the burrow(s), and the level of project disturbance. If necessary, avoidance buffers will be identified with flagging, fencing, or other easily visible means, and will be maintained until the biologist has determined that the nestlings have fledged and all BUOW have left the proposed Project area.

Level of Disturbance				
Location	Time of Year	Low	Med	High
Nesting sites	April 1-Aug 15	200 meters	500 meters	500 meters
Nesting sites	Aug 16-Oct 15	200 meters	200 meters	500 meters
Nesting sites	Oct 16-Mar 31	50 meters	100 meters	500 meters

Mitigation Measure BIO-6 BUOW ITP and Passive Relocation: If an active BUOW burrow is detected within the proposed work area and cannot be avoided, it is recommended the proposed Project obtain an Incidental Take Permit (ITP) in order to

implement protection plans and/or relocation plans in consultation with CDFW and/or USFWS and protect the proposed Project from “take” of this species.

- 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 proposed Project site, or within the vicinity of the proposed Project site. The proposed Project site consists entirely of developed areas. As a result, the impact 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?**

No aquatic resources occur within the proposed Project site, or within the vicinity of the proposed Project site. The proposed Project site consists entirely of developed areas. As a result, there would be no impact.

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

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 proposed Project site and surrounding area is developed, and there are not known native or migratory wildlife species using the proposed Project site. As a result, there would be a less than significant impact.

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

The proposed Project would not conflict with any local policies or ordinances protecting biological resources. Though the proposed Project is subject to provisions of the City’s Municipal Code regarding trees on public property (Article 3 of Section 13 of the City of Fresno Municipal Code), the proposed Project would not conflict with any of the existing ordinances. The proposed Project would not result in the removal

of any trees. Any trees to be planted would be in accordance with Article 3 of Section 13 of the City of Fresno Municipal Code. 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)⁴ 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 proposed Project site is not located within the covered area of any other HCP, Natural Community Conservation Plan (NCCP), or other adopted local, regional or state HCP. The recommended mitigation measures to avoid impacts to nesting birds is consistent with the goals of the HCP. Therefore, the proposed Project would not conflict with the provisions of the PG&E HCP and the proposed Project would have no impact.

Mitigation Measures

1. The proposed Project shall implement and incorporate the biological resource related mitigation measures as identified in the attached Mitigation Measure Monitoring Program dated October 2025.

BIO-1 Nesting Bird Avoidance: The proposed Project's construction activities will occur, if feasible, between August 31 and January 31 (outside of the nesting bird season) to avoid impacts to nesting birds.

BIO-2 Migratory Nesting Bird Pre-Activity Survey: If activities must occur within the nesting bird season (February 1 to August 31), a qualified biologist will conduct a pre-construction survey for active migratory bird nests no more than seven (7) days prior to the start of the construction within the proposed Project site and surrounding lands up to 50 feet from the proposed Project site and for active raptor nests within the proposed Project site and all accessible lands up to 450-feet from the proposed Project site. All raptor nests would be considered "active" upon the nest-building stage.

BIO-3 Nesting Bird Avoidance Buffers: On discovery of any active nests or breeding colonies near work areas, a qualified biologist should determine appropriate avoidance buffer distances based on applicable CDFW and/or USFWS guidelines, the biology of the species, conditions of the nest(s), and the level of Project disturbance. If needed, avoidance buffers should be identified with flagging, fencing, or other easily

4 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 August 26, 2025)

visible means, and should be maintained until the biologist has determined that the nestlings have fledged.

BIO-4 BUOW Pre-Activity Survey: A qualified biologist (someone familiar with the identification and sign of this species) will conduct a pre-construction take avoidance survey for BUOW and suitable burrows, in accordance with CDFW’s Staff Report on Burrowing Owl Mitigation (2012), within seven (7) days prior to the start of construction activities. The survey will include the proposed work area and surrounding lands up to 500 feet. If construction is delayed or halted for more than seven (7) days, another pre-construction survey for BUOW will be conducted. If no BUOW individuals or active burrows are observed, no further mitigation is required.

BIO-5 BUOW Avoidance Buffers: If an active BUOW burrow is detected, avoidance buffers will be implemented. A qualified biologist will determine appropriate avoidance buffer distances based on CDFW’s 2012 Staff Report on Burrowing Owl Mitigation, the biology of BUOW, conditions of the burrow(s), and the level of project disturbance. If necessary, avoidance buffers will be identified with flagging, fencing, or other easily visible means, and will be maintained until the biologist has determined that the nestlings have fledged and all BUOW have left the proposed Project area.

Level of Disturbance				
Location	Time of Year	Low	Med	High
Nesting sites	April 1-Aug 15	200 meters	500 meters	500 meters
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Nesting sites	Oct 16-Mar 31	50 meters	100 meters	500 meters

BIO-6 BUOW ITP and Passive Relocation: If an active BUOW burrow is detected within the proposed work area and cannot be avoided, it is recommended the proposed Project obtain an Incidental Take Permit (ITP) in order to implement protection plans and/or relocation plans in consultation with CDFW and/or USFWS and protect the proposed Project from “take” of this species.

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

DISCUSSION

a) 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.

As discussed in the Cultural Resources Report/Historic Resource Assessment, attached in Appendix C, no historical resources were identified within or adjacent to the proposed Project site. However, project development could result in potential impacts to unknown resources that are located below the ground surface. Adherence to the requirements in the following mitigation measure would reduce potential impacts to unknown historical resources to a less than significant level.

Mitigation Measure CUL-1: If previously unknown resources are encountered before or during grading activities, construction shall stop in the immediate vicinity of the find and a qualified historical resources specialist shall be consulted to determine whether the resource requires further study. The qualified historical

resources specialist shall make recommendations to the City on the measures that shall be implemented to protect the discovered resources, including but not limited to excavation of the finds and evaluation of the finds in accordance with Section 15064.5 of the CEQA Guidelines and the City's Historic Preservation Ordinance.

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

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

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). No archaeological resources were identified in the proposed Project site. However, due to the nominal amount of prehistoric archaeological information within the majority of the City, including the proposed Project site, there is potential to impact prehistoric archaeological resources during grading and construction activities within previously undisturbed soils. Adherence to the requirements in the following mitigation measure would reduce potential impacts to unknown archeological resources to a less than significant level.

Mitigation Measure CUL-2: Prior to ground disturbance activities, a qualified professional consultant shall conduct a field survey to determine if cultural resources are present. The following procedures shall be followed.

If prehistoric resources are not found during either the field survey or literature search, excavation and/or construction activities can commence. In the event that buried prehistoric archaeological resources are discovered during excavation and/or construction activities, construction shall stop in the immediate vicinity of the find and a qualified archaeologist shall be consulted to determine whether the resource requires further study. The qualified archaeologist shall make recommendations to the City on the measures that shall be implemented to protect the discovered resources, including but not limited to excavation of the finds and evaluation of the finds in accordance with Section 15064.5 of the CEQA

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

If prehistoric resources are found during the field survey or literature review, the resources shall be inventoried using appropriate State record forms and submit the forms to the Southern San Joaquin Valley Information Center. The resources shall be evaluated for significance. If the resources are found to be significant, measures shall be identified by the qualified archaeologist. Similar to above, 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. In addition, appropriate mitigation for excavation and construction activities in the vicinity of the resources found during the field survey or literature review shall include an archaeological monitor. The monitoring period shall be determined by the qualified archaeologist. If additional prehistoric archaeological resources are found during excavation and/or construction activities, the procedure identified above for the discovery of unknown resources shall be followed.

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

Disturbance of human remains interred outside of formal cemeteries would result in a significant impact. If human remains are identified during project construction, Section 7050.5 of the California Health and Safety Code and Section 5097.98 of the Public Resources Code shall apply, as appropriate. Although there is no record of isolated human remains or unknown cemeteries on the proposed Project site, there is always a possibility that ground-disturbing activities associated with future development may uncover previously unknown buried human remains. Adherence to the requirements in the following mitigation measure would reduce potential impacts to unknown human remains to a less than significant level.

Mitigation Measure CUL-3: In the event that human remains are unearthed during excavation and grading activities of any future development project, all activity shall cease immediately. Pursuant to Health and Safety Code (HSC) Section 7050.5, no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98(a). If the remains are determined to be of Native American descent, the coroner shall within 24 hours notify the Native American Heritage Commission

(NAHC). The NAHC shall then contact the most likely descendent of the deceased Native American, who shall then serve as the consultant on how to proceed with the remains. Pursuant to PRC Section 5097.98(b), upon the discovery of Native American remains, the landowner shall ensure that the immediate vicinity, according to generally accepted cultural or archaeological standards or practices, where the Native American human remains are located is not damaged or disturbed by further development activity until the landowner has discussed and conferred with the most likely descendants regarding their recommendations, if applicable, taking into account the possibility of multiple human remains. The landowner shall discuss and confer with the descendants all reasonable options regarding the descendants' preferences for treatment.

Mitigation Measures

1. The proposed Project shall implement and incorporate the cultural resource-related mitigation measures as identified in the attached Mitigation Measure Monitoring Program dated October 2025.

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

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

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

CUL-2: Prior to ground disturbance activities, a qualified professional consultant shall conduct a field survey to determine if cultural resources are present. The following procedures shall be followed.

If prehistoric resources are not found during either the field survey or literature search, excavation and/or construction activities can commence. In the event that buried prehistoric archaeological resources are discovered during excavation and/or construction activities, construction shall stop in the immediate vicinity of the find and

a qualified archaeologist shall be consulted to determine whether the resource requires further study. The qualified archaeologist shall make recommendations to the City on the measures that shall be implemented to protect the discovered resources, including but not limited to excavation of the finds and evaluation of the finds in accordance with Section 15064.5 of the CEQA Guidelines. If the resources are determined to be unique prehistoric archaeological resources as defined under Section 15064.5 of the CEQA Guidelines, mitigation measures shall be identified by the monitor and recommended to the Lead Agency. Appropriate measures for significant resources could include avoidance or capping, incorporation of the site in green space, parks, or open space, or data recovery excavations of the finds. No further grading shall occur in the area of the discovery until the Lead Agency approves the measures to protect these resources. Any prehistoric archaeological artifacts recovered as a result of mitigation shall be provided to a City-approved institution or person who is capable of providing long-term preservation to allow future scientific study.

If prehistoric resources are found during the field survey or literature review, the resources shall be inventoried using appropriate State record forms and submit the forms to the Southern San Joaquin Valley Information Center. The resources shall be evaluated for significance. If the resources are found to be significant, measures shall be identified by the qualified archaeologist. Similar to above, 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. In addition, appropriate mitigation for excavation and construction activities in the vicinity of the resources found during the field survey or literature review shall include an archaeological monitor. The monitoring period shall be determined by the qualified archaeologist. If additional prehistoric archaeological resources are found during excavation and/or construction activities, the procedure identified above for the discovery of unknown resources shall be followed.

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

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

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

DISCUSSION

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

The proposed Project would 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). The expected energy consumption during construction and operation of the proposed Project would be consistent with typical usage rates for office 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, since the proposed Project would be located in a developed urban area and would be required to comply with the City’s energy efficiency policies, including General Plan Policies RC-8-a, RC-8-b, RC-8-c, RC-8-f, and RC-8-j, the proposed Project would not result in wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation. Therefore, the proposed Project would have a less than significant impact.

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

The proposed Project would be required to comply with the CALGreen Code (CCR Title 24, Part 11) and the California Energy Code (CCR Title 24, Part 6), which includes provisions related to insulation and design aimed at minimizing energy consumption.

Furthermore, as discussed in Section VIII, the proposed Project would be consistent with the greenhouse gas and energy measures included in the General Plan and the greenhouse gas emissions impact thresholds recommended to ensure that the proposed Project would reduce its “fair share” of emissions needed to support State goals for long-term greenhouse gas emissions reductions and carbon neutrality. The recommendations and policies that would be implemented by the proposed Project are outlined below. 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.

Mitigation Measures

Mitigation Measures are not necessary.

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

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

DISCUSSION

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

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

Fault 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 proposed Project site is not located within an Alquist-Priolo Earthquake Fault Zone. In addition, no known active or potentially active faults or fault traces are located in the proposed Project vicinity. The nearest active faults are the Nunez Fault, located approximately 50 miles southwest from the proposed Project site, and the San Andreas Fault located approximately 65 miles southwest from the proposed Project site.⁵ As a result, potential impacts related to fault ruptures would be less than significant.

ii. Strong seismic ground shaking?

The City of Fresno is located in an area with historically low to moderate level of seismicity. However, strong ground shaking could occur within the proposed

⁵ Department of Conservation. 2021. EQ Zapp: California Earthquake Hazards Zone Application. Available online at: <https://www.conservation.ca.gov/cgs/geohazards/eq-zapp> (accessed August 14, 2025)

Project site during seismic events and occurrences have the possibility to result in significant impacts. Major seismic activity along the nearby Great Valley Fault Zone or the Nunez Fault, or other associated faults, could affect the proposed Project site through strong seismic ground shaking. Strong seismic ground shaking could potentially cause structural damage to the proposed Project. However, due to the distance to the known faults, hazards due to ground shaking would be minimal. In addition, compliance with the California Building Code (Title 24, California Code of Regulations) 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 of Fresno 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.⁶ Additionally, compliance with the Fresno Municipal Code and the California Building Code, as well as 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 of Fresno 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 proposed Project site is located in a

6 City of Fresno. 2020. General Plan Program Environmental Impact Report - Geology and Soils. Available online at: <https://www.fresno.gov/darm/wp-content/uploads/sites/10/2020/03/Fresno-GP-Public-Review-Draft-Program-EIR.pdf> (accessed August 14, 2025)

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 proposed 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, of this Initial Study). Although designed primarily to protect stormwater quality, the SWPPP would incorporate Best Management Practices (BMPs) to minimize erosion. Additional details regarding the SWPPP are provided in Section X, Hydrology and Water Quality, of this Initial Study. 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 proposed 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, the proposed Project would have a less than significant impact related to unstable soils.

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. The proposed Project site contains Tujunga soil, a loamy sand soil⁷, which has a relatively low clay content and low expansion potential. Furthermore, compliance with recommendations from the City of Fresno Municipal Code would reduce potential impacts related to expansive soils to less than significant.

7 Natural Resources Conservation Service. Web Soil Survey. Available online at: <https://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx> (accessed August 14, 2025)
554951v2

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 proposed Project site would be served by a wastewater conveyance system maintained by the Wastewater Management Division (WMD) of the City of Fresno. 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?

Development in the City of Fresno could potentially impact unknown paleontological resources or unique geological features. Implementation of the following Mitigation Measure GEO-1 would ensure that a field survey and record search are conducted prior to construction on a previously undisturbed site, and that paleontological/geological resources found during the field survey or during project construction would be handled and preserved by a qualified paleontologist. Adherence to the requirements of Mitigation Measure GEO-1 would reduce potential impacts to paleontological and geological resources to less than significant with mitigation incorporated.

Mitigation Measures

1. The proposed Project shall implement and incorporate the geology and soils related mitigation measures as identified in the attached Mitigation Measure Monitoring Program dated October 2025.

GEO-1: Subsequent to a preliminary City review of the proposed Project grading plans, if there is evidence that a project will include excavation or construction activities within previously undisturbed soils, a field survey and literature search for unique paleontological/geological resources shall be conducted. The following procedures shall be followed:

- If unique paleontological/geological resources are not found during either the field survey or literature search, excavation and/or construction activities can commence. In the event that unique paleontological/geological 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 Lead Agency. 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 Lead Agency 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.

- If unique paleontological/geological resources are found during the field survey or literature review, the resources shall be inventoried and evaluated for significance. If the resources are found to be significant, mitigation measures shall be identified by the qualified paleontologist. Similar to above, 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. In addition, appropriate mitigation for excavation and construction activities in the vicinity of the resources found during the field survey or literature review shall include a paleontological monitor. The monitoring period shall be determined by the qualified paleontologist. If additional paleontological/geological resources are found during excavation and/or construction activities, the procedure identified above for the discovery of unknown resources shall be followed.

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?

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

- Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment; or
- Conflict with an applicable plan, policy, or regulation adopted for the purpose of reduction the emissions of greenhouse gases.

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

The City of Fresno does not have a current greenhouse gas reduction plan, and the SJVAPCD also does not have adopted thresholds of significance for greenhouse gas emissions. Therefore, in the absence of any City or SJVAPCD specific guidelines or thresholds, this analysis evaluates the proposed Project for consistency with the Bay Area Air District (BAAD) Justification Report: CEQA Thresholds for Evaluating the Significance of Climate Impacts from Land Use Projects and Plans (Justification Report).⁸

In April 2022, BAAD adopted the Justification Report, which identifies applicable greenhouse gas significance thresholds. These thresholds establish whether a project would be consistent with California's efforts to meet long-term climate goals as established in the State's 2022 Scoping Plan, including achieving carbon neutrality by 2045. If a project is designed and built to incorporate design elements related to natural gas, energy, VMT, and EVs, then it would contribute its portion of what is necessary to achieve California's long-term climate goals — its "fair share" — and an agency reviewing the project under CEQA can conclude that the project would not make a cumulatively considerable contribution to global climate change.

The Justification Report provides substantial evidence supporting the use of BAAD's thresholds for projects throughout California because the thresholds are applicable to meeting the State's established greenhouse gas reduction goals. In the absence of any City or SJVAPCD specific guidelines or thresholds, this analysis evaluates the proposed Project for consistency with the identified project design elements as the applicable thresholds of significance to establish if the proposed Project is achieving its "fair share" of emission reductions to support long-term State goals for greenhouse gas emissions and carbon neutrality.

According to the Justification Report, a project would have a less than significant impact related to greenhouse gas emissions if it would include 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 electrical 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

⁸ https://www.baaqmd.gov/~/_media/files/planning-and-research/ceqa/ceqa-thresholds-2022/justification-report-pdf.pdf?la=en

Governor’s Office of Planning and Research's Technical Advisory on Evaluating Transportation Impacts in CEQA:

- Residential projects: 15 percent below the existing VMT per capita
 - Office projects: 15 percent below the existing VMT per employee
 - Retail projects: no net increase in existing VMT
- b. Achieve compliance with off-street electric vehicle requirements in the most recently adopted version of CALGreen Tier 2.

The City of Fresno adopted CEQA Guidelines for Vehicle Miles Traveled Thresholds that identify City thresholds as 14 VMT per Capita Threshold for residential land uses and a 22.3 VMT per-employee threshold for employee-based land uses. The 22.3 VMT threshold will be used in this analysis.

These project design elements are utilized in the following analysis as the thresholds of significance to evaluate the proposed Project’s potential greenhouse gas emissions impact.

Construction

Total GHG emissions generated during all phases of construction were combined and are presented in Table 4. The BAAD does not recommend assessing the significance of construction-related emissions. However, other jurisdictions, such as the South Coast Air Quality Management District, have concluded that construction emissions should be included since they may remain in the atmosphere for years after construction is complete. In order to account for the construction emissions, amortization of the total emissions generated during construction were based on the life of the development (nonresidential—30 years) and added to the operational emissions.

Table 4: Construction Emissions, Greenhouse Gases	
	MTCO₂e
Total Construction Emissions	183.1
Amortized over 30 years	6.10
Notes: Calculation totals use unrounded numbers from CalEEMod output. Source: Appendix A	

Operations

Total GHG emissions generated during operations are presented in Table 5. The amortized construction emissions have been added to the operational emissions generated by the proposed Project. On opening day, the proposed Project would result in approximately 327 MTCO₂e resulting from operational activities. Operational emissions are anticipated to decrease over time as older vehicles are replaced with newer vehicles that emit fewer to no greenhouse gases.

Table 5: Operational Emissions, Greenhouse Gases	
	MTCO₂e
Operational Emissions	321.0
Amortized Construction Emissions	6.10
Total Operational Emissions plus Amortized Construction Emissions	327.10
Notes: Calculation totals use unrounded numbers from CalEEMod output. Source: Appendix A	

In the absence of any City or SJVAPCD specific guidelines or thresholds, this analysis evaluates the proposed Project for consistency with the Justification Report, which identifies project design elements as the applicable thresholds of significance. If a project is designed and built to incorporate design elements related to natural gas, energy, VMT, and EVs, then it would contribute its portion of what is necessary to achieve California’s long-term climate goals — its “fair share” — and an agency reviewing the project under CEQA can conclude that the project would not make a cumulatively considerable contribution to global climate change

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

Construction Greenhouse Gas Emissions. Construction activities associated with the proposed Project would produce combustion emissions from various sources. During construction, GHGs would be emitted through the operation of construction equipment and from worker and builder supply vendor vehicles, each of which typically use fossil-based fuels to operate. The combustion of fossil-based fuels creates GHGs such as CO₂, CH₄, and N₂O. Furthermore, CH₄ is emitted during the fueling of heavy equipment. Exhaust emissions from on-site construction activities would vary daily as construction activity levels change.

The SJVAPCD does not have an adopted threshold of significance for construction-related GHG emissions. However, lead agencies are encouraged to quantify and disclose GHG emissions that would occur during construction. Using CalEEMod, it is estimated that the annual emissions associated with construction of the proposed Project would be approximately 183.1 metric tons (MT) of CO₂e (carbon dioxide equivalent) per year. Construction GHG emissions were amortized over the life of the proposed Project (assumed to be 30 years) and added to the operational emissions. When annualized over the life of the proposed Project, amortized construction emissions would be approximately 6.10 MT CO₂e per year.

Operational Greenhouse Gas Emissions. Long-term GHG emissions are typically generated from mobile sources (e.g., vehicle and truck trips), area sources (e.g., maintenance activities and landscaping), indirect emissions from sources associated

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

Following guidance from the SJVAPCD, GHG emissions for operation of the proposed Project were calculated using CalEEMod. Based on the analysis results, summarized in Table 6, the proposed Project would result in emissions of approximately 321.0 MT CO₂e per year. These estimated emissions are provided for informational purposes, and the significance of the proposed Project is further analyzed below.

Table 6: Greenhouse Gas Emissions

Emission Type	Operational Emissions (metric tons per year)			
	CO ₂	CH ₄	N ₂ O	CO ₂ e
Mobile Sources	1,007	0.05	0.05	1,027
Area Sources	3.58	<0.005	<0.005	3.59
Energy Sources	533	0.07	0.01	536
Water Sources	10.3	0.49	0.01	26.2
Waste Sources	116	11.6	0.00	407
Amortized Construction Emissions				6.10
	Total Operational Emissions			321.0

Source: Compiled by San Joaquin Valley Air Pollution Control District (SJVAPCD). 2015. Final Draft Guidance for Assessing and Mitigating Air Quality Impacts. Website: <https://www.valleyair.org/transportation/GAMAQI2015/FINAL-DRAFT-GAMAQI.PDF>. (August 2025).
 CH₄ = methane
 CO₂ = carbon dioxide

CO₂e = carbon dioxide equivalent
 N₂O = nitrous oxide

In the absence of any City or SJVAPCD specific guidelines or thresholds, this analysis evaluates the proposed Project for consistency with the Justification Report, which identifies project design elements as the applicable thresholds of significance. If a project is designed and built to incorporate design elements related to natural gas, energy, VMT, and EVs, then it would contribute its portion of what is necessary to achieve California’s long-term climate goals — its “fair share” — and an agency reviewing the proposed Project under CEQA can conclude that the proposed Project would not make a cumulatively considerable contribution to global climate change.

Per the significance thresholds described above, a less than significant GHG impact would occur if the proposed Project were consistent with the identified design

standards, as evaluated below.

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

Energy Use. Under this design criterion, the proposed Project must not result in any wasteful, inefficient, or unnecessary energy usage as determined by the analysis required under CEQA Section 21100(b)(3) and Section 15126.2(b) of the State CEQA Guidelines.

The proposed Project would utilize approximately 468,928 kilowatt-hours of energy annually. Energy usage would be regulated by Titles 20 and 24 of the California Code of Regulations, which regulate energy usage with regards to equipment and building energy efficiency. For these reasons, the proposed Project would be consistent with this design element.

Vehicle Miles Traveled. As discussed above, development that meets a locally adopted SB 743 VMT target would be considered to have a less than significant GHG emissions impact from transportation sources. In accordance with the City's VMT guidelines, and the trip generation analysis prepared under separate cover, the proposed Project would screen out of VMT requirements and would have a less than significant GHG emissions impact from transportation sources.

Electric Vehicle Requirements. Under this design criterion, the proposed Project must demonstrate consistency with the Tier 2 measures for off-street EV parking included in the most recently adopted version of the CALGreen Code. As seen in the Project Description, the proposed Project proposes EV parking spaces in accordance with the mandatory CALGreen amounts. Therefore, the proposed Project would comply with this project design element.

The proposed Project would be consistent with the proposed Project design elements related to natural gas, energy, VMT, and EVs, which demonstrate that the proposed Project is achieving its "fair share" of GHG emission reductions. Therefore, the proposed Project would not generate substantial greenhouse gas emissions, or conflict with plans, policies, or regulations adopted for the purpose of reducing GHG emissions. The impact would be less than significant.

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

As shown in discussion a) above, the proposed Project would be consistent with the State's greenhouse gas reduction goals. Therefore, the proposed Project would not conflict with plans, policies, or regulations adopted for the purpose of reducing GHG

emissions. The impact would be less than significant.

Mitigation Measures

Mitigation Measures are not necessary.

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

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

DISCUSSION

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

Construction activities associated with the proposed Project would involve the use of limited amounts of potentially hazardous materials, including but not limited to, solvents, paints, fuels, oils, and transmission fluids. However, all materials used during construction would be contained, stored, and handled in compliance with applicable standards and regulations established by the Department of Toxic Substances Control (DTSC), the United States 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 General Plan Policies NS-4-a, NS-4-e, and NS-4-f.⁹ Any medical waste associated with operations of the facility would be properly managed in accordance with the Occupational Safety and Health Administration including 29 CFR 1910.1030 which pertains to managing biohazards in a healthcare setting. Furthermore, State requirements would be adhered to, such as California's Medical Waste Management Act which pertains to the treatment and disposal of biohazards. Therefore, the proposed Project would have a less than significant impact associated with the routine transport, use, or disposal of hazardous materials, and no mitigation is required.

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

⁹ City of Fresno. 2014. Fresno General Plan-Noise and Safety Element, pgs. 9-33, 9-34. Available online at: <https://www.fresno.gov/darm/wp-content/uploads/sites/10/2016/11/GP9NoiseandSafety.pdf> (accessed August 15, 2025).

See discussion 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 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 General Plan policies would ensure that the proposed 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 Centennial Elementary School, located approximately 0.4 miles southwest from the proposed 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 result in a less than significant impact from the use or emission of hazardous materials that could adversely affect a school.

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 database¹⁰, the proposed 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 proposed Project site is not included on the list of hazardous waste sites compiled pursuant to Government Code Section 65962.5.¹¹ As a result, no hazards to the public or environment are anticipated, and there would be 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,

10 California Department of Toxic Substances Control. 2007. EnviroStor. Available online at: <https://www.envirostor.dtsc.ca.gov/public/map/?myaddress=fresno> (accessed August 15, 2025)

11 California Environmental Protection Agency. 2018. Government Code Section 65962.5(a) Hazardous Waste and Substances Site List. Available online at: <https://calepa.ca.gov/sitecleanup/corteselist/section-65962-5a/> (accessed August 18, 2025)

would the project result in a safety hazard for people residing or working in the project area?

The nearest airports include the Fresno Yosemite International Airport, located approximately one mile southeast of the proposed Project site, Fresno Chandler Executive Airport, located approximately 5.4 miles southwest of the proposed Project site, and the Sierra Sky Airport, located approximately seven miles northwest of the proposed Project site. The nearest medical center helipads (HP) include the Saint Agnes Medical Center HP.¹² located approximately three miles north of the proposed Project site. The proposed Project site is not located in a designated safety zone' however, it is located in an Airport Influence Area (AIA) of the Fresno Yosemite International Airport. The AIA is the designated area surrounding an airport where land use is carefully planned to minimize conflicts with airport operations, particularly regarding safety and noise. While the proposed Project includes rezoning the site, the rezone would just remove a condition of approval to allow for adult daycare facilities and would not drastically change the use to one that is conflicting. Operations at these locations are not expected to pose a safety hazard for people in the proposed 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.

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

The proposed 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

12 California Department of Transportation (Caltrans). 2019. Caltrans HeliPlates. Available online at: <https://heliplates.dot.ca.gov/#> (accessed August 18, 2025)

conflagrations, and is not located within a very high fire hazard severity zone (VHFHSZ).¹³ 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 necessary.

13 California Department of Forestry and Fire Protection (CAL FIRE). 2007. *Fresno County Fire Hazard Severity Zones in LRA*. Kune . Available online at: https://osfm.fire.ca.gov/media/6673/fhszl06_1_map10.pdf (accessed August 19, 2025)

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

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

DISCUSSION

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

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

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 the nearest 100-year flood zone located approximately 0.25 miles to the northeast and a second flood zone located approximately 0.3 miles to the south of the proposed Project site.

In compliance with the 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 include clearing, grading, and other ground-disturbing activities such as stockpiling or excavation. The Construction General Permit requires development and implementation of a Storm Water Pollution Prevention Plan (SWPPP).

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 unstabilized 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. The proposed Project would be required to comply with requirements under the National Pollutant Discharge Elimination System (NPDES) Construction General Permit, including the SWPPP and BMPs, would ensure that project construction impacts on water quality would be less than significant.

Long-term operation impacts associated with the proposed Project would be less than significant due to 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?

Water supply and wastewater services for the proposed Project would be provided by the City of Fresno through the Department of Public Utilities (DPU) Water and Wastewater Management Divisions. As discussed in the City's 2020 Urban Water Management Plan (UWMP) the City relies on groundwater from the North Kings Subbasin, surface water from Central Valley Project (CVP; through a contract with the United States Bureau of Reclamation [USBR]); surface water from the Kings River, (through a contract with Fresno Irrigation District [FID]; and recycled water.¹⁴ The City has indicated that groundwater wells, pump stations, recharge facilities, water treatment and distribution systems shall be expanded incrementally to mitigate increased water demands. One of the primary objectives of Fresno's future water supply plans detailed in Fresno's current UWMP is to balance groundwater operations through a host of strategies. Through careful planning, Fresno has designed a comprehensive plan to accomplish this objective by increasing surface water supplies and surface water treatment facilities, intentional recharge, and conservation, thereby reducing groundwater pumping. The City continually monitors impacts of land use changes and development project proposals on water supply facilities by assigning fixed demand allocations to each parcel by land use as currently zoned or proposed to be rezoned.

In 2020, Fresno updated its UWMP designed to ensure the Fresno metro area has a reliable water supply through 2045. The plan implements a conjunctive use program,

14 City of Fresno. 2021. 2020 Urban Water Management Plan - Final. Available online at: https://www.fresno.gov/publicutilities/wp-content/uploads/sites/16/2021/07/Fresno-2020-UWMP_Final_2021-07-21.pdf (accessed August 19, 2025)

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. In addition, the City adopted the 2020 Water Shortage Contingency Plan (WSCP) which is a detailed plan that provides guidance how the City would respond to foreseeable and unforeseeable water shortages. The WSCP provides tools to maintain reliable supplies and reduce the impacts of supply interruptions due to extended drought and catastrophic supply interruptions.

The General Plan requires the City to maintain 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 Best Management Practices for water conservation to maintain surface water entitlements. The proposed Project would comply with all applicable water conservation programs and regulations required by the City's General Plan.

The proposed Project would also be consistent with water management strategies from both the Urban Water Management Plan and the Metropolitan Water Resources Management Plan. Furthermore, the proposed Project Applicant would be required to comply with water management requirements and recommendations of the City of Fresno Department of Public Utilities, which would reduce the proposed Project impacts to groundwater recharge to less than significant. When development permits are issued, the proposed Project site would be required to pay drainage fees pursuant to the Drainage Fee Ordinance. For all of these reasons, impacts associated with the proposed Project would be less than significant.

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). The nearest storm drain connection to the site is located on Hampton Way which fronts the northern border of the proposed Project site.

As required by the General Plan, a SWPPP would be developed prior to any ground disturbance at the proposed 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 Fresno Metropolitan Flood Control District (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?

The proposed Project is located at the intersection of Cedar Avenue and Hampton Way. The nearest storm drain to the proposed Project, which would ultimately receive any runoff from the proposed Project site, is located along Hampton Way. 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 of Fresno grading plan check process, the SDFCMP, and the NPDES Construction General Permit. Compliance with these required regulations would ensure that project construction impacts on grading patterns and flooding on and off of the construction site would be less than significant levels.

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?

Please refer to discussions a) and c) i and ii in this section. The proposed Project would increase impervious surfaces at the proposed 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 Storm Drainage and Flood Control Master Plan (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 proposed Project 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 floodplain ordinance of the City of Fresno 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 City's floodplain ordinance requires that a registered Civil Engineer in the State of California certify that no displacement of floodwater would result from the flood proofing of a structure within a floodplain or a regulatory floodway. The proposed Project is not located within the 100-year flood hazard area as mapped by the Federal Emergency Management Agency (FEMA).¹⁵ As a result, the impact would be less than significant.

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

The proposed Project site is not located in flood hazard, tsunami, or seiche zones. Refer to discussion a) in Section IX, Hazards and Hazardous Materials regarding the use of hazardous materials within the proposed Project site. As a result, a less than significant impact would occur.

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

The City is located within the Kings Sub-basin, which is part of the larger San Joaquin Valley Groundwater Basin. The planning documents regarding water resources for the City include the North Kings Groundwater Sustainability Act (GSA) Groundwater Management Plan, the City of Fresno Urban Water Management Plan, and City of Fresno Metropolitan Water Resources Management Plan. The proposed Project would be required to adhere to NPDES drainage control requirements during construction and operation as well as to FMFCD drainage control requirements. As a result, the proposed Project would not 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 necessary.

¹⁵ Federal Emergency Management Agency. 2020. FEMA Flood Map Service Center: Search By Address. Available online at: <https://msc.fema.gov/portal/search?AddressQuery#searchresultsanchor> (accessed August 19, 2025) 554951v2

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

DISCUSSION

a) Physically divide an established community?

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

The proposed Project site is located at the corner of Hampton Way and Cedar Avenue in the central region of the City. The proposed Project would include development of a 20,000 sq. ft. one-story healthcare facility along with ancillary landscaping improvements. 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 proposed Project site is designated Office in the General Plan. This land use designation is intended to allow for administrative, financial, business, professional,

medical, and public offices. The proposed Project site is located in an Office zoning district which allows for similar uses identified in the General Plan designation¹⁶.

The proposed Project would require a change in the current zoning to remove the condition that does not allow adult daycare facilities. Removing this condition would not conflict with the intention of the underlying Office General Plan land use designation or zoning. The proposed Project would be consistent with the City's General Plan and Zoning Ordinance. Additionally, the proposed Project would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, the impact would be less than significant.

Mitigation Measures

Mitigation Measures are not necessary.

16 City of Fresno. 2016. Fresno Municipal Code Chapter 15: Citywide Development Code. Available online at: https://www.fresno.gov/darm/wp-content/uploads/sites/10/2016/11/Complete_Code_March_2017.pdf (accessed August 20, 2025)

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

DISCUSSION

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

The principal area for mineral resources in the City of Fresno 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 proposed Project site is not located in the vicinity of the San Joaquin River, is not a MRZ, and it doesn't contain a MRZ. 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?

Please refer to the discussion for a). The proposed Project would not result in the loss of availability of any known locally important mineral resource recovery sites. Therefore, the proposed Project would have a less than significant impact.

Mitigation Measures

Mitigation measures are not necessary.

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 L_{max} 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 L_{eq} 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. Sensitive receptors within 1,000 feet of the proposed Project site include 120 single-family residences and one healthcare facility. The closest sensitive receptors to the proposed Project site are the residences to the north across Hampton Way at 50 feet away. The healthcare facility is located approximately 800 feet away to the north across Hampton Way, Buckingham Way and Ashlan Avenue.

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

Thus, although development activities associated with the proposed Project could potentially result in a temporary or periodic increase in ambient noise levels in the proposed 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 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 proposed 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 proposed Project vicinity. A characteristic of sound is that a doubling of a noise source is required in order to result in a perceptible (3 dBA or greater) increase in the resulting noise level. As discussed below in Section XVII, Transportation, the proposed Project would generate approximately 210 daily trips. The proposed Project daily trips would not result in a doubling of traffic volumes along any roadway segment in the proposed Project vicinity and, therefore, would not result in a perceptible increase in traffic noise levels at receptors in the proposed Project vicinity.

Long-term noise associated with the proposed Project primarily originates from vehicles traveling to and from the site and from traffic traveling along North Cedar

Avenue and E. Hamton Way. The immediate vicinity consists of existing and planned residential, commercial, office, and recreational uses, which produce noise levels that are likely similar to long-term noise levels produced by the proposed Project. Additionally, all surrounding properties are adjacent to collector and arterial streets, which increase the ambient noise of the proposed Project site.

By adhering to FMC Section 10-109, 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 proposed 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 proposed 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 (HP) to the proposed Project site include Saint Agnes Medical Center HP¹⁷, located approximately 3 miles north of the proposed Project site. The nearest airports include the Fresno Yosemite International Airport, located approximately 1 mile southeast of the proposed Project site, Fresno Chandler Executive Airport, located approximately 5.4 miles southwest of the proposed Project site, and the Sierra Sky Airport, located approximately 7 miles northwest of the proposed Project site.

Each of these airports is considered under the Fresno County Airport Land Use Compatibility Plan (ALUCP)¹⁸, which guides local jurisdictions in determining appropriate compatible land uses with detailed findings and policies. The City of Fresno 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 CNEL noise contours based on projected airport and aircraft operations. The proposed Project site is not located in a designated safety zone' however, it is located in an Airport Influence Area (AIA) of the Fresno Yosemite International Airport. The AIA is the designated area surrounding an airport where land use is carefully planned to minimize conflicts with airport operations, particularly regarding safety and noise. While the proposed Project includes rezoning the site, the rezone would just remove a condition of approval to allow for adult daycare facilities and would not drastically change the use to one that is conflicting. 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 necessary.

17 California Department of Transportation (Caltrans). 2019. Caltrans HeliPlates. Available online at: <https://heliplates.dot.ca.gov/#> (accessed August 21, 2025)

18 Fresno Council of Governments. 2018. Fresno County Airport Land Use Compatibility Plan. Amended December 2021. Available online at: <https://www.fresnocog.org/project/airport-land-use-commission-fresno-county/> (accessed August 21, 2025)

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

DISCUSSION

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

The proposed Project would include the construction of a 20,000-square-foot PACE facility to support non-residential senior facilities and services, in addition to installation of on-site landscaping and signage. Furthermore, the site is designated Office by the General Plan and belongs to the Office zoning district, which allows for administrative, financial, business, professional, medical, and public offices.

The proposed Project would not result in direct population growth as the use proposed is not residential and would not contribute to permanent residency on site. Therefore, the proposed Project would not directly or indirectly induce unplanned population growth and there would be no impact.

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

The proposed Project site is currently a primarily vacant lot with a portion of it improved with a parking lot. The proposed Project site is surrounded by urban development. Surrounding land uses include residential uses to the north and west, commercial to the south, and commercial/park uses to the east. 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 necessary.

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 21 FFD fire stations in Fresno, with the closest fire station, Fire Station No. 5, located approximately 1.8 miles from the proposed Project site. Planned growth under the General Plan would increase calls for fire protection service in the City. The proposed use of the proposed Project site is consistent with the site’s General Plan designation and does not represent

unplanned growth given that the proposed Project site would be developed consistent with its land use and zoning designations. The proposed Project could result in an incremental increase in the demand for fire protection services because of additional employees to the proposed Project site. 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 proposed 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 affect existing responses times to the site or within the City. Therefore, construction and operation of the proposed Project would have a less than significant impact.

ii. Police protection?

The City of Fresno Police Department (FPD) provides police protection to the proposed Project site. The Police Department Patrol Division is divided into five policing districts with nearest being the Northeast Policing District Station located approximately 4.6 miles from the proposed Project site. Planned growth under the General Plan would increase calls for police protection service in the City. The proposed use of the proposed Project site is consistent with the site's General Plan designation and does not represent unplanned growth given that the proposed Project site would be developed consistent with its land use and zoning designation.

The proposed 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 proposed 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 represent a less than significant impact.

iii. Schools?

The proposed Project would not generate student demand or otherwise impact school services given that there is no housing or a residential component. As such,

there would be no impact to schools.

iv. Parks?

The proposed Project would develop a 20,000 square foot building and on-site landscaping. The proposed Project could result in an incremental increase in the demand for parks as a result of additional employees/visitors at the proposed 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.

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 necessary.

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

DISCUSSION

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

The proposed Project would not include on-site open space or any recreational facilities. and would not generate population growth that would result in an increase in the use of existing neighborhood and regional parks or other recreational facilities. Therefore, a less than significant impact to parks and recreational facilities would occur as a result of the proposed Project

- 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 consist of developing a 20,000 square foot building and on-site landscaping. The proposed Project would not include or require the construction or expansion of existing public recreational facilities. Therefore, the impact would be less than significant.

Mitigation Measures

Mitigation Measures are not necessary.

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

DISCUSSION

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

The proposed Project site is located within Traffic Impact Zone (TIZ) II. TIZ II generally represents areas of the City currently built up and appropriate for infill development. The goal in the TIZ II, is to maintain a peak hour LOS standard of E or better for all intersections and roadway segments. Furthermore, a TIS will be required for all development projected to generate 200 or more peak hour new vehicle trips. According to the Trip Generation Analysis prepared for the proposed Project, the peak hour new vehicle trips is 45, which is below the threshold identified by the City.

The proposed Project site is located at North Cedar Avenue and East Hampton Way, which is 650 feet south of the intersection of North Cedar Avenue and East Ashlan Avenue. There are six bus stops within a 1,000 foot radius of the proposed Project site. Additionally, the portion of North Cedar Avenue that fronts the proposed Project site contains both a bike lane and sidewalk for pedestrians, while the portion of East Hampton Way that fronts the proposed Project site contains a sidewalk. Implementation of the proposed Project would not conflict with any existing implementation of applicable programs or plans, or conflict with operation of existing

facilities. Therefore, the impact would be less than significant.

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 project would create on California roads. If the project adds excessive car travel onto our roads, the project may cause a significant transportation impact.

The State CEQA Guidelines were amended to implement SB 743, by adding Section 15064.3. Among its provisions, Section 15064.3 confirms that, except with respect to transportation projects, a project's effect on automobile delay shall not constitute a significant environmental impact. Therefore, LOS measures of impacts on traffic facilities is no longer a relevant CEQA 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 vehicle miles traveled and any revision to model outputs should be documented and explained in the environmental document prepared for that 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, dated June 25, 2020, pursuant to Senate Bill 743 to be effective of July 1, 2020. The thresholds described therein are referred to herein as the City of Fresno VMT Thresholds. The City of Fresno VMT Thresholds document was prepared and adopted consistent with the requirements of CEQA Guidelines Sections 15064.3 and 15064.7. The December 2018 Technical Advisory on Evaluating Transportation Impacts in CEQA (Technical Advisory) published by the Governor's Office of Planning and Research (OPR), was utilized as a reference and guidance document in the preparation of the Fresno VMT Thresholds.

The proposed Project proposes to develop a 20,000 sq. ft. one-story healthcare facility. 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 proposed Project is eligible to screen out because one screening threshold pertains to projects generating low volume of daily traffic. The VMT Guidelines state projects generating fewer than 500 average daily trips may “screen out” of further VMT analysis. The proposed Project would generate 210 average daily trips and is therefore under the 500 average daily trips threshold.

In conclusion, the proposed Project will result in a less than significant VMT impact and is consistent with CEQA Guidelines Section 15064.3(b).

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 proposed Project would include the development of a 20,000 sq. ft. one-story healthcare facility. The proposed Project would not alter pedestrian or vehicle access to the proposed Project site, or introduce incompatible design features or equipment that would substantially increase the risk of hazards. Therefore, the proposed Project would not substantially increase hazards due to a design feature, and there would be no impact.

d) Result in inadequate emergency access?

The proposed Project would include the development of a 20,000 sq. ft. one-story healthcare facility. Emergency vehicles would have access to the proposed Project site via North Cedar Avenue and East Hampton Way, and emergency access would not be modified as a result of the proposed Project. Furthermore, roads adjacent to the proposed Project site would not require closure during project construction. Therefore, there would be no impact.

Mitigation Measures

Mitigation Measures are not necessary.

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), or**

As previously discussed in Section V, Cultural Resources, the proposed 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. Furthermore, the area surrounding the proposed Project site does not contain any listed historical resources. As a result, a less than significant impact would occur.

- 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 the Public Resources Code (PRC) Section 2107(a). Under AB 52, public agencies shall reach out to California Native American Tribes who have requested to be notified of projects in areas within or which may have been affiliated with their tribal geographic range. Pursuant to Assembly Bill 52 (AB 52), tribes who requested to be notified of projects 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, CUL-2 and CUL-3 included above in Section V, Cultural Resources, would apply to the proposed Project and would reduce potential impacts to unknown archaeological historical resources to less than significant with mitigation.

Mitigation Measures

See Mitigation Measures CUL-1, CUL-2 and CUL-3 included above in Section V, Cultural Resources.

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

DISCUSSION

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

The Department of Public Utilities 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 Department of Public Utilities standards, specifications, and policies.

Impacts to storm drainage facilities have been previously discussed in Section 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 of such facilities would be required to comply with the City's grading plan check process, the Fresno Metropolitan Flood Control District (FMFCD) Storm Drainage and Flood Control Master Plan (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 proposed Project site. However, because the proposed 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 proposed Project would not result in the relocation or construction of 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?**

As discussed above, the Department of Public Utilities would supply water to the proposed Project site. Based on the UWMP, the water supplies for the City (357,330 Acre Feet (AF)/year) are adequate to accommodate the demand in the City by 2045 (i.e., 241,447 AF/year). The proposed Project would be consistent with the UWMP and would therefore be covered by the City's water supply projections. As a result, there would be sufficient water supply for the proposed 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 applicable Regional Water Quality Control Board. The City of Fresno owns and operates two wastewater treatment facilities; the Fresno/Clovis Regional Wastewater Reclamation Facility (RWRF), and the North Fresno Wastewater Reclamation Facility (North 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.¹⁹

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 2047.²⁰

Operation of the proposed Project would generate approximately 120 pounds of solid waste per day or about 22 tons of solid waste per year. 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 proposed Project would be served by a landfill with sufficient capacity to accommodate the proposed Project's waste disposal needs, and impacts associated with the disposition of solid waste would be less than significant.

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

¹⁹ CalRecycle. Available online at: <https://www2.calrecycle.ca.gov/SolidWaste/Site/Summary/352> (accessed August 21, 2025)

²⁰ CalRecycle. Available online at: <https://www2.calrecycle.ca.gov/SolidWaste/Site/Summary/347> (accessed August 21, 2025)

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 General Plan and the Greenhouse Gas Reduction Plan Update.²¹ 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 necessary.

21 City of Fresno, 2021. Greenhouse Gas Reduction Plan Update. Available online at:
<https://www.fresno.gov/darm/wp-content/uploads/sites/10/2021/03/Link4AppendixGGHGRPUupdate.pdf>
(accessed August 21, 2025)

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

DISCUSSION

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

The proposed Project would not interfere with any emergency evacuation routes within the City of Fresno or an adopted emergency response plan. The proposed Project site would not require the alteration of any existing roadways. Therefore, the impact would be less than significant.

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

The proposed Project site is in an urban area and is not located within a Very High Fire Hazard Severity Zone (VHFHSZ).²² The proposed Project site does not possess physical characteristics that would exacerbate wildfire risks. 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 proposed Project site is located in a developed area of the City of Fresno, 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, a less than significant impact would occur.

- 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 proposed 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 proposed Project site would not be susceptible to landslides. The proposed 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 proposed Project is not located within a VHFHSZ. Therefore, the proposed Project would not expose people or structures to significant risks, and a less than significant impact would occur.

Mitigation Measures

Mitigation Measures are not necessary.

22 California Department of Forestry and Fire Protection (CAL FIRE). 2008. Fresno County Very High Fire Hazard Severity Zones in LRA. Available online at: <https://osfm.fire.ca.gov/divisions/wildfire-planning-engineering/wildland-hazards-building-codes/fire-hazard-severity-zones-maps/> (accessed August 21, 2025)
554951v2

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 analysis conducted in this IS/MND results in a determination that the proposed Project, with incorporation of mitigation measures, would have a less than significant effect on the environment. The potential for impacts to air quality, biological resources, cultural resources, geology and soils, and tribal cultural resources from the construction and operation of the proposed Project. 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 air quality, biological resources, cultural resources, 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 topic(s) of aesthetics, agriculture and forestry resources, air quality, energy, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, noise, population and housing, public services, recreation, transportation, utilities and service systems, and wildfire , the proposed Project would have no impacts or less than significant impacts, and therefore, the proposed Project would not substantially contribute to any potential cumulative impacts for these topics. 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 proposed 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. The proposed Project, when considered with related past, present, and reasonably foreseeable projects, would not result in significant cumulative impacts.

The proposed Project's incremental contributions are consistent with regional plans, General Plan growth assumptions, and applicable thresholds, and would be less than cumulatively considerable with incorporation of standard regulatory compliance measures and mitigation measures. 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 impact human beings has been evaluated in this Initial Study. Construction emissions could cause exposure to significant amounts of cancer-causing diesel particulate matter. With implementation of the recommended mitigation measures, all environmental effects that could adversely affect human beings would be less than significant.

Table A: Mitigation Monitoring and Reporting Program

MITIGATION MEASURE	Timing for Mitigation Measure	Mitigation Responsibility	Monitoring/ Reporting Agency	Verification (Initials and Date)
I. AESTHETICS				
There are no significant impacts to Aesthetics.				
II. AGRICULTURE				
There are no significant impacts to Agriculture.				
III. AIR QUALITY				
AIR-1: Diesel-powered construction equipment of 50 horsepower or greater shall meet EPA Tier 3 standards and be equipped with a Level 3 diesel particulate filter, or shall meet EPA Tier 4 standards.	During construction activities	Lead Agency	Lead Agency	
IV. BIOLOGICAL RESOURCES				
BIO-1 (Nesting Bird Avoidance): The proposed Project's construction activities will occur, if feasible, between August 31 and January 31 (outside of the nesting bird season) to avoid impacts to nesting birds.	Prior to commencement of construction activities	Lead Agency	Lead Agency	
BIO-2 (Migratory Nesting Bird Pre-Activity Surveys): If activities must occur within the nesting bird season (February 1 to August 31), a qualified biologist will conduct a pre-construction survey for active migratory bird nests no more than seven (7) days prior to the start of the construction within the proposed Project site and surrounding lands up to 50 feet from the proposed Project site and for active raptor nests within the proposed Project site and all accessible lands up to 450-feet from the proposed Project site. All raptor nests would be considered "active" upon the nest-building stage.	If construction commences between February 1 and August 31	Lead Agency	Lead Agency	
BIO-3 (Nesting Bird Avoidance Buffers): On discovery of any active nests or breeding colonies near work areas, a qualified biologist should determine appropriate avoidance buffer distances based on applicable CDFW and/or USFWS guidelines, the biology of the species, conditions of the nest(s), and the level of Project disturbance. If needed, avoidance buffers should be identified with flagging, fencing, or other easily visible means, and should be maintained until the biologist has determined that the nestlings have fledged.	Upon discovery of active nests or breeding colonies near work areas	Lead Agency	Lead Agency	
BIO-4 BUOW Pre-Activity Survey: A qualified biologist (someone familiar with the identification and sign of this species) will conduct a	Within seven (7) days prior to the	Lead Agency	Lead Agency	

Table A: Mitigation Monitoring and Reporting Program

MITIGATION MEASURE	Timing for Mitigation Measure	Mitigation Responsibility	Monitoring/ Reporting Agency	Verification (Initials and Date)																									
<p>pre-construction take avoidance survey for BUOW and suitable burrows, in accordance with CDFW's Staff Report on Burrowing Owl Mitigation (2012), within seven (7) days prior to the start of construction activities. The survey will include the proposed work area and surrounding lands up to 500 feet. If construction is delayed or halted for more than seven (7) days, another pre-construction survey for BUOW will be conducted. If no BUOW individuals or active burrows are observed, no further mitigation is required.</p>	<p>start of construction activities</p>																												
<p>BIO-5 BUOW Avoidance Buffers: If an active BUOW burrow is detected, avoidance buffers will be implemented. A qualified biologist will determine appropriate avoidance buffer distances based on CDFW's 2012 Staff Report on Burrowing Owl Mitigation, the biology of BUOW, conditions of the burrow(s), and the level of project disturbance. If necessary, avoidance buffers will be identified with flagging, fencing, or other easily visible means, and will be maintained until the biologist has determined that the nestlings have fledged and all BUOW have left the proposed Project area.</p> <table border="1" data-bbox="157 885 949 1140"> <thead> <tr> <th colspan="5">Level of Disturbance</th> </tr> <tr> <th>Location</th> <th>Time of Year</th> <th>Low</th> <th>Med</th> <th>High</th> </tr> </thead> <tbody> <tr> <td>Nesting sites</td> <td>April 1-Aug 15</td> <td>200 meters</td> <td>500 meters</td> <td>500 meters</td> </tr> <tr> <td>Nesting sites</td> <td>Aug 16-Oct 15</td> <td>200 meters</td> <td>200 meters</td> <td>500 meters</td> </tr> <tr> <td>Nesting sites</td> <td>Oct 16-Mar 31</td> <td>50 meters</td> <td>100 meters</td> <td>500 meters</td> </tr> </tbody> </table>	Level of Disturbance					Location	Time of Year	Low	Med	High	Nesting sites	April 1-Aug 15	200 meters	500 meters	500 meters	Nesting sites	Aug 16-Oct 15	200 meters	200 meters	500 meters	Nesting sites	Oct 16-Mar 31	50 meters	100 meters	500 meters	<p>Upon discovery of an active BUOW burrow</p>	<p>Lead Agency</p>	<p>Lead Agency</p>	
Level of Disturbance																													
Location	Time of Year	Low	Med	High																									
Nesting sites	April 1-Aug 15	200 meters	500 meters	500 meters																									
Nesting sites	Aug 16-Oct 15	200 meters	200 meters	500 meters																									
Nesting sites	Oct 16-Mar 31	50 meters	100 meters	500 meters																									
<p>BIO-6 BUOW ITP and Passive Relocation: If an active BUOW burrow is detected within the proposed work area and cannot be avoided, it is recommended the proposed Project obtain an Incidental Take Permit (ITP) in order to implement protection plans and/or relocation plans in consultation with CDFW and/or USFWS and protect the proposed Project from "take" of this species.</p>	<p>Upon discovery of an active BUOW burrow that cannot be avoided</p>	<p>Lead Agency</p>	<p>Lead Agency</p>																										

Table A: Mitigation Monitoring and Reporting Program

MITIGATION MEASURE	Timing for Mitigation Measure	Mitigation Responsibility	Monitoring/ Reporting Agency	Verification (Initials and Date)
V. CULTURAL RESOURCES				
<p>CUL-1: If previously unknown resources are encountered before or during grading activities, construction shall stop in the immediate vicinity of the find and a qualified historical resources specialist shall be consulted to determine whether the resource requires further study. The qualified historical resources specialist shall make recommendations to the City on the measures that shall be implemented to protect the discovered resources, including but not limited to excavation of the finds and evaluation of the finds in accordance with Section 15064.5 of the CEQA Guidelines and the City's Historic Preservation Ordinance.</p> <p>If the resources are determined to be unique historical resources as defined under Section 15064.5 of the CEQA Guidelines, measures shall be identified by the monitor and recommended to the Lead Agency. Appropriate measures for significant resources could include avoidance or capping, incorporation of the site in green space, parks, or open space, or data recovery excavations of the finds.</p> <p>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-approved institution or person who is capable of providing long-term preservation to allow future scientific study.</p>	<p>Upon discovery of previously-unknown cultural resources</p>	<p>Lead Agency</p>	<p>Lead Agency</p>	
<p>CUL-2: Prior to ground disturbance activities, a qualified professional consultant shall conduct a field survey to determine if cultural resources are present. The following procedures shall be followed.</p> <p>If prehistoric resources are not found during either the field survey or literature search, excavation and/or construction activities can commence. In the event that buried prehistoric archaeological resources are discovered during excavation and/or construction</p>	<p>Prior to ground disturbance activities</p>	<p>Lead Agency</p>	<p>Lead Agency</p>	

Table A: Mitigation Monitoring and Reporting Program

MITIGATION MEASURE	Timing for Mitigation Measure	Mitigation Responsibility	Monitoring/Reporting Agency	Verification (Initials and Date)
<p>activities, construction shall stop in the immediate vicinity of the find and a qualified archaeologist shall be consulted to determine whether the resource requires further study. The qualified archaeologist shall make recommendations to the City on the measures that shall be implemented to protect the discovered resources, including but not limited to excavation of the finds and evaluation of the finds in accordance with Section 15064.5 of the CEQA Guidelines. If the resources are determined to be unique prehistoric archaeological resources as defined under Section 15064.5 of the CEQA Guidelines, mitigation measures shall be identified by the monitor and recommended to the Lead Agency. Appropriate measures for significant resources could include avoidance or capping, incorporation of the site in green space, parks, or open space, or data recovery excavations of the finds. No further grading shall occur in the area of the discovery until the Lead Agency approves the measures to protect these resources. Any prehistoric archaeological artifacts recovered as a result of mitigation shall be provided to a City-approved institution or person who is capable of providing long-term preservation to allow future scientific study.</p> <p>If prehistoric resources are found during the field survey or literature review, the resources shall be inventoried using appropriate State record forms and submit the forms to the Southern San Joaquin Valley Information Center. The resources shall be evaluated for significance. If the resources are found to be significant, measures shall be identified by the qualified archaeologist. Similar to above, 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. In addition, appropriate mitigation for excavation and construction activities in the vicinity of the resources found during the field survey or literature review shall include an archaeological monitor. The monitoring period shall be determined by the qualified</p>				

Table A: Mitigation Monitoring and Reporting Program

MITIGATION MEASURE	Timing for Mitigation Measure	Mitigation Responsibility	Monitoring/ Reporting Agency	Verification (Initials and Date)
archaeologist. If additional prehistoric archaeological resources are found during excavation and/or construction activities, the procedure identified above for the discovery of unknown resources shall be followed.				
<p>CUL-3: In the event that human remains are unearthed during excavation and grading activities of any future development project, all activity shall cease immediately. Pursuant to Health and Safety Code (HSC) Section 7050.5, no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98(a). If the remains are determined to be of Native American descent, the coroner shall within 24 hours notify the Native American Heritage Commission (NAHC). The NAHC shall then contact the most likely descendent of the deceased Native American, who shall then serve as the consultant on how to proceed with the remains. Pursuant to PRC Section 5097.98(b), upon the discovery of Native American remains, the landowner shall ensure that the immediate vicinity, according to generally accepted cultural or archaeological standards or practices, where the Native American human remains are located is not damaged or disturbed by further development activity until the landowner has discussed and conferred with the most likely descendants regarding their recommendations, if applicable, taking into account the possibility of multiple human remains. The landowner shall discuss and confer with the descendants all reasonable options regarding the descendants' preferences for treatment.</p>	Upon discovery of human remains	Lead Agency	Lead Agency	
VI. ENERGY				
There are no significant impacts to Energy.				
VII. GEOLOGY AND SOILS				
<p>GEO-1: Subsequent to a preliminary City review of the proposed Project grading plans, if there is evidence that a project will include excavation or construction activities within previously undisturbed soils, a field survey and literature search for unique</p>	During construction activities	Lead Agency	Lead Agency	

Table A: Mitigation Monitoring and Reporting Program

MITIGATION MEASURE	Timing for Mitigation Measure	Mitigation Responsibility	Monitoring/Reporting Agency	Verification (Initials and Date)
<p>paleontological/geological resources shall be conducted. The following procedures shall be followed:</p> <ul style="list-style-type: none"> • If unique paleontological/geological resources are not found during either the field survey or literature search, excavation and/or construction activities can commence. In the event that unique paleontological/geological 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 Lead Agency. 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 Lead Agency 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. • If unique paleontological/geological resources are found during the field survey or literature review, the resources shall be inventoried and evaluated for significance. If the resources are found to be significant, mitigation measures shall be identified by the qualified paleontologist. Similar to above, appropriate mitigation measures for significant 				

Table A: Mitigation Monitoring and Reporting Program

MITIGATION MEASURE	Timing for Mitigation Measure	Mitigation Responsibility	Monitoring/Reporting Agency	Verification (Initials and Date)
<p>resources could include avoidance or capping, incorporation of the site in green space, parks, or open space, or data recovery excavations of the finds. In addition, appropriate mitigation for excavation and construction activities in the vicinity of the resources found during the field survey or literature review shall include a paleontological monitor. The monitoring period shall be determined by the qualified paleontologist. If additional paleontological/geological resources are found during excavation and/or construction activities, the procedure identified above for the discovery of unknown resources shall be followed.</p>				
VIII. GREENHOUSE GAS EMISSIONS				
There are no significant impacts to Greenhouse Gas Emissions.				
IX. HAZARDS AND HAZARDOUS MATERIALS				
There are no significant impacts to Hazards and Hazardous Materials.				
X. HYDROLOGY AND WATER QUALITY				
There are no significant impacts to Hydrology and Water Quality.				
XI. LAND USE AND PLANNING				
There are no significant impacts to Land Use and Planning.				
XII. MINERAL RESOURCES				
There are no significant impacts to Mineral Resources.				
XIII. NOISE				
There are no significant impacts to Noise.				
XIV. POPULATION AND HOUSING				
There are no significant impacts to Population and Housing.				
XV. PUBLIC SERVICES				
There are no significant impacts to Public Services.				
XVI. RECREATION				
There are no significant impacts to Recreation.				
XVII. TRANSPORTATION				

Table A: Mitigation Monitoring and Reporting Program

MITIGATION MEASURE	Timing for Mitigation Measure	Mitigation Responsibility	Monitoring/ Reporting Agency	Verification (Initials and Date)
There are no significant impacts to Transportation.				
XVII. TRIBAL CULTURAL RESOURCES				
See CUL-1, CUL-2, and CUL-3 above.	During construction activities	Lead Agency	Lead Agency	
XIX. UTILITIES AND SERVICE SYSTEMS				
There are no significant impacts to Utilities and Service Systems.				
XX. WILDFIRE				
There are no significant impacts to Wildfire.				
XXI. MANDATORY FINDINGS OF SIGNIFICANCE				
See BIO-1 above. Prior to commencement of construction activities County of Fresno County of Fresno				

GRANITE PARK PACE FACILITY

AIR QUALITY AND GREENHOUSE GAS EMISSIONS ANALYSIS

FRESNO, CA
AUGUST 2025

Prepared For:
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Fresno, California

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ABBREVIATIONS

AB	Assembly Bill
ADMRT	Air Dispersion Modeling and Risk Assessment Tool
APCD	Air Pollution Control District
AQ	Air Quality
AQMD	Air Quality Management District
AQP	Air Quality Plan
BAAQMD	Bay Area Air Quality Management District
BPS	Best Performance Standards
CAFE	Corporate Average Fuel Economy
CARB	California Air Resources Board
CAAQS	California Ambient Air Quality Standards
CalEEMod	California Emissions Estimator Model
CalGreen Code	California Green Building Standards Code
CCA	Clean Air Act
CCAA	California Clean Air Act
CCR	California Code of Regulations
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CO	Carbon monoxide
DPM	Diesel particulate matter
EMFAC	ARB Emission Factor
EO	Executive Order
EPA	United States Environmental Protection Agency
GAMAQI	<i>Guideline for Assessing and Mitigating Air Quality Impacts</i>
GHG	Greenhouse Gas
HARP	Hotspots Analysis and Reporting Program
HRA	Health Risk Assessment
IPCC	United Nations Intergovernmental Panel on Climate Change
Lead Agency	City of Fresno
MTCO _{2e}	Metric Tons Carbon Dioxide Equivalent
NAAQS	National Ambient Air Quality Standards
NHTSA	National Highway Traffic Safety Administration
NO _x	Oxides of Nitrogen
PM ₁₀	Particulate matter 10 microns or less
PM _{2.5}	Particulate matter 2.5 microns or less
Project	Granite Park PACE Facility
ROG	Reactive organic gases
SB	Senate Bill
SCS	Sustainable Communities Strategy
SIP	State Implementation Plan
SJVAB	San Joaquin Valley Air Basin
SJVAPCD	San Joaquin Valley Air Pollution Control District
SLCP	Short-Lived Climate Pollutant
SO ₂	Sulfur dioxide
TAC	Toxic Air Contaminant
VOC	Volatile Organic Compounds
ZEV	Zero Emission Vehicles

1 EXECUTIVE SUMMARY

1.1 PURPOSE AND METHODS OF ANALYSIS

The following air quality (AQ) and greenhouse gas (GHG) analysis was prepared to evaluate whether the estimated criteria air pollutants, toxic air contaminants (TACs), and GHG emissions generated from the construction and operation of the Granite Park PACE Facility (Project) would cause significant impacts to air resources in the Project area. This assessment was conducted within the context of the California Environmental Quality Act (CEQA, California Public Resources Code Sections 21000, et seq.). The methodology follows the *Guidance for Assessing and Mitigating Air Quality Impacts* (GAMAQI) prepared by the San Joaquin Valley Air Pollution Control District (SJVAPCD) for quantification of emissions and evaluation of potential impacts to air resources¹ and the SJVAPCD’s *Guidance for Valley Land-Use Agencies in Addressing GHG Emission Impacts for New Projects under CEQA*.²

1.2 PROJECT DESCRIPTION

The Project proponent proposes to construct an approximately 20,000 square foot PACE (Program for All-Inclusive Care for the Elderly) facility.

1.3 SUMMARY OF ANALYSIS RESULTS

The following is a summary of the analysis results. As shown below, the Project would result in less than significant impacts for all air quality impact criteria, and all GHG impact criteria analyzed.

Table 1-1: Impact Summary

Impact	Appendix G Question	Result
AIR-1	The project would not conflict with or obstruct implementation of the applicable air quality plan.	Less than Significant Impact.
AIR-2	The project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard (including releasing emissions, which exceed quantitative thresholds for ozone precursors).	Less than Significant Impact.
AIR-3	The project would not expose sensitive receptors to substantial pollutant concentrations, with the implementation of Tier 3 diesel engines with Level 3 Diesel Particulate Filters or Tier 4 diesel engines, on all diesel engines of 50 horsepower or greater.	Less than Significant Impact with Mitigation.
AIR-4	The project would not create objectionable odors affecting a substantial number of people.	Less than Significant Impact.
GHG-1	The project would generate direct and indirect greenhouse gas emissions; however, these emissions would not result in a significant impact on the environment, should the project install EV chargers consistent with the most recently adopted version of CALGreen Tier 2.	Less than Significant Impact with Mitigation.
GHG-2	The project would not conflict with any applicable plan, policy or regulation of an agency adopted to reduce the emissions of greenhouse gases, should the project install EV chargers consistent with the most recently adopted version of CALGreen Tier 2.	Less than Significant Impact with Mitigation.

¹ (San Joaquin Valley Air Pollution Control District, 2015)

² (San Joaquin Valley Air Pollution Control District, 2009)

2 AIR QUALITY

2.1 REGULATORY SETTING

2.1.1 FEDERAL

At the federal level, the United States Environmental Protection Agency (EPA) has been charged with implementing national air quality programs. The EPA's air quality mandates are drawn primarily from the federal Clean Air Act (CAA). The federal CAA was first signed into law in 1963. Congress substantially amended the federal CAA in 1970, 1977, and 1990.

The EPA deals with global, international, national, and interstate air pollution issues. Their primary role at the state level is one of oversight of state air quality programs. The EPA sets federal standards for vehicle and stationary sources and provides research and guidance in air pollution programs.

The federal CAA required the EPA to set National Ambient Air Quality Standards (NAAQS) for several problem air pollutants on the basis of human health and welfare criteria. Two types of NAAQS have been established: primary standards, which protect public health, and secondary standards, which protect public welfare (e.g., crops, forests, materials, visibility, etc.). Primary NAAQS have been established for the following criteria air pollutants:

- Carbon monoxide (CO)
- Ozone (O₃)
- Respirable particulate matter (PM₁₀)
- Fine particulate matter (PM_{2.5})
- Nitrogen dioxide (NO₂)
- Sulfur dioxide (SO₂)
- Lead (Pb)

All of the above, except CO, also have some form of secondary standard. The primary NAAQS standards are intended to protect, within an adequate margin of safety, those persons most susceptible to respiratory distress, such as people suffering from asthma or other illness, the elderly, very young children, or others engaged in strenuous work or exercise.

The EPA designates areas with air quality not meeting federal standards as “nonattainment.” The federal CAA further classifies nonattainment areas based on the severity of the nonattainment problem, with marginal, moderate, serious, severe, and extreme nonattainment classifications for ozone. Nonattainment classifications for PM range from marginal to serious.

The federal CAA requires areas with air quality violating the NAAQS to prepare an air quality control plan referred to as the State Implementation Plan (SIP). The SIP contains the strategies and control measures that states such as California will use to attain the NAAQS. The federal CAA amendments of 1990 require states containing areas that violate the NAAQS to revise their SIP to incorporate additional control measures to reduce air pollution. The SIP is a living document that is periodically modified to reflect the latest emissions inventories, planning documents, rules, and regulations of Air Basins as reported by the agencies with jurisdiction over them. The EPA reviews SIPs to determine if they conform to the mandates of the federal CAA amendments and will achieve air quality goals when implemented. If the EPA determines a SIP to be inadequate, it may prepare a Federal Implementation Plan for the nonattainment area and impose additional control measures.

In addition to setting health-based standards for air pollutants, the EPA also oversees state and local actions to improve air quality. The following list provides a brief explanation of important regulations set forth by EPA:

FEDERAL CLEAN AIR ACT (CAA)

- Requires air quality plans to include measures necessary to achieve NAAQS.
- Requires all plans, programs, and projects that require federal approval, including transportation plans, to conform to air quality plans.
- Requires sanctions if all feasible measures are not expeditiously adopted.

2.1.2 STATE

States are required to develop and implement air pollution control plans designed to achieve and maintain the NAAQS established by the EPA. States may also establish their own standards, provided the state standards are at least as stringent as the NAAQS. California has established California Ambient Air Quality Standards (CAAQS) pursuant to Health and Safety Code Section 39606(b) and its predecessor statutes.

The California Legislature established the Air Resources Board (CARB) in 1967. The CARB is the agency responsible for coordination and oversight of state and local air pollution control programs in California and for implementing the California Clean Air Act (CCAA) of 1988. The CCAA provides a planning framework for attainment of the CAAQS for O₃, CO, SO₂, and NO₂. The CCAA classifies ozone nonattainment areas as moderate, serious, severe, and extreme based on severity of violation of state ambient air quality standards. For each class, the CCAA specifies air quality management strategies that must be adopted. For all nonattainment categories, attainment plans are required to demonstrate a five-percent-per-year reduction in nonattainment air pollutants or their precursors, averaged every consecutive three-year period, unless an approved alternative measure of progress is developed. Air districts responsible for air basins with air quality that is in violation of CAAQS for O₃, CO, SO₂, and NO₂ are required to prepare an air quality attainment plan that lays out a program to attain the CCAA mandates.

Other CARB duties include monitoring air quality in conjunction with air monitoring networks maintained by air pollution control districts (APCDs) and air quality management districts (AQMDs), establishing CAAQS (which are more stringent than the NAAQS in many cases), setting emissions standards for new motor vehicles, and reviewing district input for the SIP required by the federal CAA amendments. The SIP consists of the emissions standards for vehicular sources set by the CARB as well as attainment plans adopted by the APCD or AQMD and approved by the CARB.

The State of California, through the CARB and Bureau of Automotive Repair, develops programs to reduce pollution from vehicles and consumer products. The following list provides a brief explanation of important regulations set forth by the State of California:

CALIFORNIA CLEAN AIR ACT (CCAA)

- Requires all feasible control measures, including transportation control measures, to reduce emissions.
- Provides for indirect source programs in attainment plans.
- Contains targets for emission reductions, vehicle miles traveled, and average vehicle ridership.

AB (ASSEMBLY BILL) 170

- Requires cities and counties in the Valley to incorporate strategies to improve air quality in their general planning efforts.

SB (SENATE BILL) 709

- Gave the Air District more responsibility in terms of permitting, fee implementation, and agricultural assistance, but also gives the Air District the authority to require the use of best available control technology (BACT) for existing sources, promote cleaner-burning alternative fuels, and encourage and facilitate ridesharing.

- Allows the Air District to adopt a surcharge on motor vehicle registration fees in counties within the Air District.

CALIFORNIA GOVERNMENT CODE SECTION 65089

- Requires trip reduction and travel demand management in Congestion Management Programs.

2.1.3 REGIONAL

Air pollution does not respect political boundaries. Therefore, many air quality problems are best managed on a regional basis. In 1991 the State Legislature determined that management of an air basin by a single agency would be more effective than management through each county within that basin. Air basins are geographic areas sharing a common "air-shed." Most major metropolitan areas in California now fall under the authority of multi-county APCDs or AQMDs.

Air districts have the primary responsibility for control of air pollution from all sources other than direct motor vehicle emissions, which are the responsibility of the CARB and EPA. Air districts adopt and enforce rules and regulations to achieve state and federal ambient air quality standards and enforce applicable state and federal law.

The San Joaquin Valley Air Pollution Control District (SJVAPCD), formed in 1991, has jurisdiction over air quality matters in the San Joaquin Valley Air Basin (SJVAB), spanning the counties of Fresno, Kings, Madera, Merced, San Joaquin, Stanislaus, Tulare, and the western portion of Kern.

Until the passage of the CCAA, the primary role of county APCDs was controlling stationary sources of pollution, such as industrial processes and equipment. With the passage of the CCAA and federal CAA amendments, air districts were required to implement transportation control measures and were encouraged to adopt indirect source control programs to reduce mobile source emissions. These mandates created the necessity for air districts to work closely with cities, counties, and regional transportation planning agencies to develop new programs.

The Air District entered into a memorandum of understanding with the eight San Joaquin Valley County transportation planning agencies in 1992. This memorandum of understanding ensures a coordinated approach in the development and implementation of transportation plans throughout the Valley. This action has helped the Regional Transportation Planning Agencies comply with pertinent provisions of the federal and state Clean Air Acts as well as related transportation legislation (such as the Intermodal Surface Transportation Efficiency Act).

The Air District develops plans and implements control measures in an effort to advance Valley attainment of CAAQS and NAAQS. The Air District has developed plans to attain state and federal standards for ozone and particulate matter. The Air District's air quality plans include emissions inventories to measure the sources of air pollutants, to evaluate how well different control methods have worked, and to show how air pollution will be reduced. The plans also use computer modeling to estimate future levels of pollution and make sure that the Valley will meet air quality goals on time.

Control measures applicable to this Project are as follows:

Regulation VIII—Fugitive PM₁₀ Prohibitions

Regulation VIII is a control measure that is one main strategies from the 2006 PM₁₀ Plan for reducing the PM₁₀ emissions that are part of fugitive dust. Projects over 10 acres are required to file a Dust Control Plan DCP containing dust control practices sufficient to comply with Regulation VIII.

Rule 2201 – New and Modified Stationary Source

The purpose of this rule is to regulate new and modifications to existing stationary sources of emissions. These emission sources require both an Authority to Construct and a Permit to Operate. Criteria air pollutant emissions that exceed thresholds must be offset to avoid interfering with attainment or

maintenance of ambient air quality standards. This project would be required to comply with Rule 2201 for its Gasoline Dispensing Facility use.

Rule 4002—National Emissions Standards for Hazardous Air Pollutants

The purpose of the rule is to incorporate the National Emission Standards for Hazardous Air Pollutants from Part 61, Chapter I, Subchapter C, Title 40, Code of Federal Regulations and the National Emission Standards for Hazardous Air Pollutants for Source Categories from Part 63, Chapter I, Subchapter C, Title 40, Code of Federal Regulations to protect the health and safety of the public from hazardous air pollutants, such as asbestos.

Rule 4102—Nuisance

The purpose of this rule is to protect the health and safety of the public and applies to any source operation that emits or may emit air contaminants or other materials. Agricultural activities are exempt from the nuisance rule.

Rule 4621—Gasoline Transfer Into Stationary Storage Containers, Delivery Vessels, and Bulk Plants

The purpose of this rule is to limit VOC emissions from stationary storage containers, delivery vessels, and bulk plants.

Rule 4622—Nuisance

The purpose of this rule is to limit emissions of gasoline vapors from the transfer of gasoline into motor vehicle fuel tanks.

Rule 9510 – Indirect Source Review

The purpose of this rule is to ensure that land use development projects reduce their construction/operational NO_x and PM₁₀ emissions by 20%/40% and 33.3%/50%, respectively. Operational emissions are required to be reduced over a period of 10 years. Emission reductions can be obtained either by implementing on-site improvements, such as using more efficient construction equipment, improved land use design, electrical vehicle chargers, photovoltaic panels, or by simply paying an in-lieu fee that goes towards emission-reducing projects elsewhere in the Air District’s region.

Other Measures

Other control measures that apply to the Project are Rule 4641—Cutback, Slow Cure, and Emulsified Asphalt, Paving and Maintenance Operation that requires reductions in volatile organic compound (VOC) emissions during paving and Rule 4601—Architectural Coatings that limits the VOC content of all types of paints and coatings sold in the San Joaquin Valley. These measures apply at the point of sale of the asphalt and coatings, so Project compliance is ensured.

2.1.4 LOCAL

The City of Fresno adopted its General Plan in December 2014. The applicable air quality goals and policies from the General Plan are listed below.

Policy RC-4-a: Support Regional Efforts. Fresno City supports federal and state programs that improve air quality. The city encourages monitoring and control efforts of mobile and stationary sources.

Policy RC-4-b Conditions of Approval. The city shall develop and incorporate maintenance requirements for approval conditions. These standards are subject to the General Plan amendments, community plans, Specific Plans, neighborhood plans, Concept Plans, and development proposals

Policy RC-4-e Support Employer-Based Efforts. Employers are encouraged to minimize traffic congestion. Employers may stagger work hours, incentivize the use of carpools, incentivize public transit, or take other measures.

Policy RC-4-k Electric Vehicle Charging. Fresno City will develop standards for vehicle charging infrastructure, which will be applicable to both private and publicly owned land. The city is encouraging charging infrastructure as the technology grows.

Policy RC-5-c GHG Reduction through Design and Operations. This policy, RC-5-c, encourages the effort to include GHG emission reduction requirements for entitlement decisions, facility design, and operational measures.

Policy RC-5-e Ensure Compliance. This measure ensures that ongoing compliance with GHG reduction plans is being met. It incorporates compliance into the project's design, conditions of approval, and mitigation measures.

Policy RC-5-f Toolkit. The city will provide feasible measures, as a toolkit, to reduce emissions for project applicants or residents.

2.2 ENVIRONMENTAL SETTING

Air quality impacts are both local and regional. Regional and local air quality is impacted by topography, dominant airflows, atmospheric inversions, location, and season. The Project is located in the SJVAB, which experiences some of the most challenging environmental conditions for air quality in the nation. The following section describes these conditions as they pertain to the Air Basin. The information in this section is primarily from the SJVAPCD's GAMAQI.³

2.2.1 CLIMATE METEOROLOGY, TOPOGRAPHY

The Project site is located in urbanized Fresno city limits. The SJVAB (in which the Project site is located) has an inland Mediterranean climate characterized by warm, dry summers and cooler winters. Summer temperatures often exceed 100 degrees Fahrenheit (°F) and can vary as much as 30°F. Winters are for the most part mild and humid, with average high in the 50s, while the average daily low temperature is approximately 45°F.

The vertical dispersion of air pollutants in the Valley is limited by the presence of persistent temperature inversions. Air temperature usually decreases as altitude increases. A reversal of this atmospheric state, where the air temperature increases with height, is termed an inversion. Air above and below an inversion does not mix because of differences in air density thereby restricting air pollutant dispersal.

Wind speed and direction play an important role in the dispersion and transport of air pollutants. During summer periods, winds typically originate from the northern San Joaquin Valley and flow in a south-southeasterly direction through the Valley, down through the Tehachapi Pass and into the neighboring Southeast Desert Air Basin. During winter months, winds occasionally originate in the opposite direction, from the south end of the Valley and flow in a north-northwesterly direction. Also, during winter months, the Valley experiences light, variable winds, less than 10 miles per hour. Low wind speeds, combined with low inversion layers in the winter, create a climate conducive to high concentrations of certain air pollutants.

³ (San Joaquin Valley Air Pollution Control District, 2015)

The SJVAB is basically a flat area bordered on the east by the Sierra Nevada Mountains; on the west by the Coast Ranges; and to the south by the Tehachapi Mountains. Airflow in the SJVAB is primarily influenced by marine air that enters through the Carquinez Straits where the San Joaquin-Sacramento Delta empties into the San Francisco Bay. The region's topographic features restrict air movement through and out of the basin. As a result, the SJVAB is highly susceptible to pollutant accumulation over time. Frequent transport of pollutants into the SJVAB from upwind sources also contributes to poor air quality.

2.2.2 ATTAINMENT STATUS

The EPA and the CARB designate air basins where ambient air quality standards are exceeded as "nonattainment" areas. If standards are met, the area is designated an "attainment" area. If there is inadequate or inconclusive data to make a definitive attainment designation, they are considered "unclassified." National nonattainment areas are further designated marginal, moderate, serious, severe, or extreme as a function of deviation from standards. Each standard has a different definition, or "form" of what constitutes attainment, based on specific air quality statistics. For example, the federal 8-hour CO standard is not to be exceeded more than once per year; therefore, an area is in attainment of the CO standard if no more than one 8-hour ambient air monitoring values exceeds the threshold per year. In contrast, the federal annual PM_{2.5} standard is met if the three-year average of the annual average PM_{2.5} concentration is less than or equal to the standard. The current attainment designations for the Air Basin are shown in

Table 2-1. The Air Basin is designated nonattainment for ozone, PM₁₀, and PM_{2.5}.

Table 2-1: Ambient Air Quality Standards & Attainment Designation

Pollutant	Averaging Time	National Standards	California Standards
Ozone (O ₃)	1-hour	No Federal Standard	Nonattainment/Severe
	8-hour	Nonattainment (Extreme)	Nonattainment
Particulate Matter (PM ₁₀)	AAM	Attainment	Nonattainment
	24-hour		
Fine Particulate Matter (PM _{2.5})	AAM	Nonattainment	Nonattainment
	24-hour		
Carbon Monoxide (CO)	1-hour	Attainment/Unclassified	Attainment/Unclassified
	8-hour		
	8-hour (Lake Tahoe)		
Nitrogen Dioxide (NO ₂)	AAM	Attainment/Unclassified	Attainment
	1-hour		
Sulfur Dioxide (SO ₂)	AAM	Attainment/Unclassified	Attainment
	24-hour		
	3-hour		
	1-hour		
Lead (Pb)	30-day Average	No Designation/Classification	Attainment
	Calendar Quarter		
	Rolling 3-Month Average		
Hydrogen Sulfide (H ₂ S)	1-hour	No Federal Standards	Unclassified
Sulfates (SO ₄)	24-hour	No Federal Standards	Attainment
Visibility-Reducing Particle Matter	8-hour	No Federal Standards	Unclassified
Vinyl Chloride (C ₂ H ₃ Cl)	24-hour	No Federal Standards	Attainment
AAM = Annual Arithmetic Mean Source: (San Joaquin Valley Air Pollution Control District, 2025)			

2.2.3 AMBIENT AIR QUALITY LEVELS

Criteria air pollutant concentrations are measured at several monitoring stations in the surrounding area. **Table 2-2** summarizes the air quality data measured at monitoring stations near the project site during the last three available years (2022-2025). The Clovis-N Villa station is the closest station to the project site with recent data for ozone, PM_{2.5}, and PM₁₀. Both CARB and EPA use monitoring data to designate areas

according to their attainment status for criteria air pollutants (attainment designations are summarized above in

Table 2-1).

Table 2-2: Summary of Annual Data on Ambient Air Quality

	2022	2023	2024
Ozone			
Maximum concentration (1-hr/8-hr avg, ppm)	0.109/0.084	0.102/0.083	0.109/0.092
Number of days state standard exceeded (1-hr/8-hr)	3/26	3/23	16/51
Number of days national standard exceeded (8-hr)	23	21	45
Fine Particulate Matter (PM_{2.5})			
Maximum concentration (24-hour µg/m ³)	41.9	34.7	51.3
Number of days national standard exceeded (24-hour measured)	4	0	7
Respirable Particulate Matter (PM₁₀)			
Maximum concentration (µg/m ³)	127.0	104.7	122.7
Number of days state standard exceeded	73	44	66
Number of days national standard exceeded	0	0	0
Notes: µg/m ³ = micrograms per cubic meter; ppm = parts per million Source: (California Air Resources Board, 2025)			

2.3 THRESHOLD OF SIGNIFICANCE

2.3.1 CRITERIA AIR POLLUTANTS

The District’s annual emission significance thresholds used for the Project define the substantial contribution for both operational and construction emissions as follows:

Table 2-3: Thresholds of Significance for Criteria Air Pollutants

Criteria Pollutant	Emissions (in tons per year)	
	Construction	Operations
ROG	10	10
CO	100	100
NO _x	10	10
SO _x	27	27
PM ₁₀	15	15
PM _{2.5}	15	15

2.3.2 ODORS

Odor impacts on residential areas and other sensitive receptors, such as hospitals, day-care centers, schools, etc. warrant the closest scrutiny, but consideration should also be given to other land uses where people may congregate, such as recreational facilities, worksites, and commercial areas. The District has determined the common land use types that are known to produce odors in the Air Basin. These types are shown in [Table 2-4](#).

Table 2-4: Screening Levels for Potential Odor Sources

Odor Generator	Screening Distance
Wastewater Treatment Facilities	2 miles
Sanitary Landfills	1 mile
Transfer Stations	1 mile
Composting Facilities	1 mile
Petroleum Refineries	2 miles
Asphalt Batch Plants	1 mile
Chemical Manufacturers	1 mile
Fiberglass Manufacturers	1 mile
Painting/Coating Operations	1 mile
Food Processors	1 mile
Feed Lots and Dairies	1 mile
Rendering Plants	1 mile

2.3.3 TOXIC AIR CONTAMINANTS

The District’s current thresholds of significance for toxic air contaminant (TAC) emissions from the operations of both permitted and non-permitted sources are combined and presented in **Table 2-5** below.

Table 2-5: Thresholds of Significance for Toxic Air Contaminants

Toxic Air Contaminant Type	Threshold
Carcinogens	Maximally Exposed Individual risk equals or exceeds 20 in one million
Non-Carcinogen, Acute Effects	Hazard Index equals or exceeds 1 for the Maximally Exposed Individual
Non-Carcinogen, Chronic Effects	Hazard Index equals or exceeds 1 for the Maximally Exposed Individual

2.4 METHODOLOGY

2.4.1 SHORT-TERM CONSTRUCTION-GENERATED EMISSIONS

Short-term construction emissions associated with the Project were calculated with the California Emissions Estimator Model (CalEEMod), Version 2022.1. These output files can be found in **Appendix A**. The sections below detail the methodology of the air quality emissions analysis and its conclusions.

The emissions modeling includes emissions generated by off-road equipment, haul trucks, and worker commute trips. Emissions were quantified based on CalEEMod default assumptions.

2.4.2 LONG-TERM OPERATIONAL EMISSIONS

Operational emissions occur over the lifetime of the Project and are from three main sources: area sources, energy usage, and motor vehicles usage known as mobile sources. Area source emissions include emissions from natural gas, landscape, painting, and stationary sources. Operations are expected to commence in January 2026. Modeling assumptions and output files are included in **Appendix A**. The unmitigated long-term operational emissions for the Project are listed in **Table 2-7**.

2.5 IMPACT ANALYSIS

The CEQA Guidelines define a significant effect on the environment as “a substantial, or potentially substantial, adverse change in the environment.” To determine if a project would have a significant impact on air quality, the type, level, and impact of emissions generated by the project must be evaluated. A significant impact would occur if the Project would:

- a) Conflict with or obstruct implementation of the applicable air quality plan;
- b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable national or state ambient air quality standard;
- c) Expose sensitive receptors to substantial pollutant concentrations; or
- d) Result in other emissions (such as those leading to odors adversely affecting a substantial number of people).

While the final determination of whether a project is significant is within the purview of the Lead Agency pursuant to Section 15064(b) of the CEQA Guidelines, the District recommends that its quantitative air pollution thresholds be used to determine the significance of project emissions. If the Lead Agency finds that the Project has the potential to exceed these air pollution thresholds, the Project should be considered to have significant air quality impacts. The applicable District thresholds and methodologies are contained under each impact statement below.

2.5.1 CONSISTENCY WITH AIR QUALITY PLAN

Impact AIR-1: The project would not conflict with or obstruct implementation of the applicable air quality plan.

IMPACT ANALYSIS

The CEQA Guidelines indicate that a significant impact would occur if the Project would conflict with or obstruct implementation of the applicable air quality plan. The GAMAQI indicates that projects that do not exceed SJVAPCD regional criteria pollutant emissions quantitative thresholds would not conflict with or obstruct the applicable air quality plan (AQP).

As discussed in Impact AIR-2 below, emissions of ROG, NO_x, PM₁₀, and PM_{2.5} associated with the construction and operation of the Project would not exceed the District's significance thresholds. Therefore, the Project would not contribute to air quality violations.

The Project's emissions would be less than significant for all pollutants criteria and would not result in inconsistency with the AQP for this criterion. The Project complies with all applicable control measures from the AQP therefore, the Project is consistent with the AQP, and the impact would be less than significant.

2.5.2 CUMULATIVE CRITERIA POLLUTANT IMPACTS

Impact AIR-2: The project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard.

IMPACT ANALYSIS

To result in a less significant impact, the following criteria must be true:

- a) Regional analysis: emissions of nonattainment pollutants must be below the District's regional significance thresholds. This is an approach recommended by the District in its GAMAQI.
- b) Summary of projections: the project must be consistent with current air quality attainment plans including control measures and regulations. This is an approach consistent with Section 15130(b) of the CEQA Guidelines.
- c) Cumulative health impacts: the project must result in less than significant cumulative health effects from the nonattainment pollutants.

Project-generated emissions are below the SJVAPCD’s regional significance thresholds and the Project is consistent with current air quality attainment plans including control measures and regulations, as depicted below in **Table 2-6** and **Table 2-7**.

With respect to cumulative health impacts, the air basin is in non-attainment for O₃, PM_{2.5}, and PM₁₀ (state only), which means that the background levels of those pollutants are at times higher than the ambient air quality standards. The air quality standards were set to protect public health, including the health of sensitive individuals (such as children, the elderly, and persons with pre-existing respiratory or cardiovascular illnesses (the infirm)). Therefore, when the concentration of those pollutants exceeds the standard, it is likely that some sensitive individuals in the population would experience adverse health effects. Since the air basin is already non-attainment, it is considered to have an existing significant cumulative health impact without the Project. The issue is whether the Project’s contribution to the existing violation of air quality standards is cumulatively considerable.

The SJVAPCD, through its GAMAQI has determined that projects that exceed regional thresholds would have a cumulatively considerable health impact. As demonstrated in **Table 2-6** and **Table 2-7** the Project would not exceed the SJVAPCD’s significance thresholds and its cumulatively considerable impacts would be less than significant.

CONSTRUCTION EMISSIONS

The results of the modeling are presented in **Table 2-6**. The emissions that would occur during construction activities were compared with the significance threshold for each pollutant. The emissions are below the significance thresholds. Therefore, the emissions would be less than significant on a Project basis.

Table 2-6: Construction Emission Summary, Criteria Air Pollutants

	Emissions (in tons per year)					
	ROG	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Maximum Annual Emissions	0.163	0.929	1.097	0.002	0.057	0.040
Significance Threshold	10	10	100	27	15	15
Significant Impact?	No	No	No	No	No	No
Source: Appendix A						

OPERATIONAL EMISSIONS

Operational emissions occur over the lifetime of the Project and are from two main sources: area sources and motor vehicles, or mobile sources. Operations are expected to commence in January 2027. The SJVAPCD considers construction and operational emissions separately when making significance determinations.

As shown in **Table 2-7**, the emissions are below the SJVAPCD significance thresholds prior to application of mitigation measures or taking credit for Project design features that would reduce Project emissions and, therefore, would result in a less than significant impact.

Table 2-7: Operational Emissions Summary, Criteria Air Pollutants

	Emissions (in tons per year)					
	ROG	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Maximum Annual Emissions	0.219	0.145	0.835	0.002	0.148	0.040
Significance Threshold	10	10	100	27	15	15
Significant Impact?	No	No	No	No	No	No
Source: Appendix A						

2.5.3 SENSITIVE RECEPTORS

Impact AIR-3: The project would not expose sensitive receptors to substantial pollutant concentrations, with the implementation of Tier 3 diesel engines with Level 3 Diesel Particulate Filters or Tier 4 diesel engines, on all diesel engines of 50 horsepower or greater.

IMPACT ANALYSIS

Sensitive Receptors

Those who are sensitive to air pollution include children, the elderly, and persons with pre-existing respiratory or cardiovascular illness. The District considers a sensitive receptor a location that houses or attracts children, the elderly, people with illnesses, or others who are especially sensitive to the effects of air pollutants. Examples of sensitive receptors include hospitals, residences, convalescent facilities, and schools. The closest off-site sensitive receptors are several rural residences adjacent to the Project site. For criteria pollutants, impacts to receptors are based on emissions during the highest daily emissions during construction and operations. As shown in **Table 2-8**, emissions generated from construction and operation of the Project are less than SJVAPCD screening criteria. Therefore, this impact would be less than significant.

Localized Pollutant Screening Analysis

Emissions occurring at or near the Project have the potential to create a localized impact, also referred to as an air pollutant hotspot. Localized emissions are considered significant if, when combined with background emissions, they would result in exceedance of any health-based air quality standard. The impact from localized pollutants is based on the impact to the nearest sensitive receptor.

The SJVAPCD’s GAMAQI includes screening thresholds for identifying projects that need detailed analysis for localized impacts. Projects with on-site emission increases from construction activities or operational activities that exceed the 100 pounds per day screening level of any criteria pollutant after compliance with applicable rules and regulations and implementation of all enforceable mitigation measures would require preparation of an ambient air quality analysis. The criteria pollutants of concern for localized impact in the Air Basin are PM₁₀, PM_{2.5}, NO_x, and CO.

The results of the construction and operation screening analysis are presented in **Table 2-8**.

Table 2-8: Maximum Daily Construction and Operational Emissions, Criteria Air Pollutants

Source	Daily Emissions (in Pounds)					
	ROG	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Construction	10.23	12.88	14.31	0.023	7.716	3.970
Operations	1.351	0.829	5.519	0.011	0.823	0.227
SJVAPCD Significance Thresholds	100	100	100	100	100	100
Exceed Thresholds?	No	No	No	No	No	No
Source: Appendix A						

Maximum Daily Operational Emissions

An analysis of maximum daily emissions during operation was conducted to determine if emissions would exceed 100 pounds per day for any pollutant of concern. Operational emissions include emissions generated onsite by area sources such as natural gas combustion and landscape maintenance, and off-site by motor vehicles accessing the Project. The results of the screening analysis are presented above in **Table 2-8**.

The Project would not exceed SJVAPCD screening thresholds for localized operational criteria pollutant impacts; therefore, the Project’s localized criteria pollutant impacts would be less than significant.

Valley Fever

Valley fever, or coccidioidomycosis, is an infection caused by inhalation of the spores of the fungus, *Coccidioides immitis* (*C. immitis*). The spores live in soil and can live for an extended time in harsh environmental conditions. Activities or conditions that increase the amount of fugitive dust contribute to greater exposure, and they include dust storms, grading, and recreational off-road activities.

The Centers for Disease Control and Prevention indicates that 752 of the 8,657 persons (8.7 percent) hospitalized in California between 2000 and 2007 for Valley fever died.⁴ California experienced a record number of Valley Fever cases in 2019 with 9,090 new cases. The San Joaquin Valley is considered an endemic area for Valley fever. Within the region, Fresno County reported an infection risk of greater than 39.8 per 100,000.⁵

The distribution of *C. immitis* within endemic areas is not uniform and growth sites are commonly small (a few tens of meters) and widely scattered. Known sites appear to have some ecological factors in common suggesting that certain physical, chemical, and biological conditions are more favorable for *C. immitis* growth. Avoidance, when possible, of sites favorable for the occurrence of *C. immitis* is a prudent risk management strategy. Listed below are ecologic factors and sites favorable for the occurrence of *C. immitis*:

- | | |
|--|---|
| 1) Rodent burrows (often a favorable site for <i>C. immitis</i> , perhaps because temperatures are more moderate and humidity higher than on the ground surface) | 4) Areas with high salinity soils |
| 2) Old (prehistoric) Indian campsites near fire pits | 5) Areas adjacent to arroyos (where residual moisture may be available) |
| 3) Areas with sparse vegetation and alkaline soils | 6) Packrat middens |
| | 7) Upper 30 centimeters of the soil horizon, especially in virgin undisturbed soils |
| | 8) Sandy, well-aerated soil with relatively high water-holding capacities |

Sites within endemic areas less favorable for the occurrence of *C. immitis* include:

- Cultivated fields
- Heavily vegetated areas (e.g. grassy lawns)
- Higher elevations (above 7,000 feet)
- Areas where commercial fertilizers (e.g. ammonium sulfate) have been applied
- Areas that are continually wet
- Paved (asphalt or concrete) or oiled areas
- Soils containing abundant microorganisms
- Heavily urbanized areas where there is little undisturbed virgin soil (USGS 2000)

The Project site is situated in an infill area of the city of Fresno. Therefore, implementation of the Project would have a low probability of the site having *C. immitis* growth sites and exposure to the spores from disturbed soil, however exposure to blowing dust should be minimized.

Construction activities would generate fugitive dust that could contain *C. immitis* spores, however due to the Project size, combined with the relatively low probability of the presence of *C. immitis* spores, would reduce Valley fever impacts to less than significant.

During operations, dust emissions are anticipated to be negligible, because most of the Project area would be occupied by buildings, pavement, and landscaped areas. This condition would preclude the possibility

⁴ (Centers for Disease Control and Prevention, 2009)

⁵ (California Department of Public Health, 2022)

of the Project from providing habitat suitable for *C. immitis* spores and for generating fugitive dust that may contribute to Valley fever exposure. Impacts would be less than significant.

Diesel Particulate Matter (DPM)

DPM can be of particular concern as Project construction occurs as it is emitted from the combustion of diesel fuel. Because construction equipment is often used for lengths of time within close proximity to existing sensitive receptors, there is a concern that the increase in DPM emissions could cause localized health risk. Additionally, with projects that involve daily diesel trips, there is a potential for long-term DPM-related health risks.

A Health Risk Assessment was prepared using Hotspots Analysis and Reporting Program (HARP) Air Dispersion Modeling and Risk Assessment Tool (ADMRT) version 22118 utilizing AERMOD version 24142 was prepared for the Project, using the emissions found in **Appendix A**. Receptors were placed at existing residences surrounding the Project site. It was conservatively assumed that residential receptors did not leave the house, and that air contaminant particles infiltrate the house (essentially, residential receptors are outside 24/7/365). On-site construction exhaust PM₁₀ emissions (annual: 64.05 lbs; hourly: 0.072375 lbs) were analyzed.

Chronic, and acute health impacts were found to be less than significant, as described below in **Table 2-9**, however cancer risk would exceed established SJVAPCD thresholds. With the implementation of Tier 4 Final diesel engines of 50 horsepower or larger, or Tier 3 engines with Level 3 Diesel Particulate Filters on diesel engines of 50 horsepower or larger, impacts were reduced to less than significant.

Table 2-9: Health Risk of Maximum Exposed Individual Receptor

Source	Health Risk		
	Cancer	Chronic	Acute
Construction, Unmitigated	37.53	0.04	0
Construction with AIR-1	19.61	0.02	0
SJVAPCD Significance Thresholds	20	1	1
Exceed Thresholds?	No	No	No
Source: Appendix A			

Mitigation Measure

- *AIR-1 Diesel-powered construction equipment of 50 horsepower or greater shall meet EPA Tier 3 standards and be equipped with a Level 3 diesel particulate filter, or shall meet EPA Tier 4 standards.*

2.5.4 OBJECTIONABLE ODORS

Impact AIR-4: The project would not create objectionable odors affecting a substantial number of people.

IMPACT ANALYSIS

Construction of the Project would require the use of diesel-powered off-road construction equipment; however these emissions would not occur continuously and would cease after construction concludes. The Project would not engage in any of the activities listed in **Table 2-4**. Land uses that are typically identified as sources of objectionable odors include landfills, transfer stations, sewage treatment plants, wastewater pump stations, composting facilities, feed lots, coffee roaster, asphalt batch plants, and rendering plants, among other uses. The Project does not include any of these activities or land uses. The Project would therefore have a less significant impact with respect to generation of emissions leading to odors or other adverse or objectionable emissions.

3 GREENHOUSE GASES

Climate change is a change in the average weather of the earth that is measured by alterations in wind patterns, storms, precipitation, and temperature. These changes are assessed using historical records of temperature changes occurring in the past, such as during previous ice ages. Many of the concerns regarding climate change use this data to extrapolate a level of statistical significance, specifically focusing on temperature records from the last 150 years (the Industrial Age) that differ from previous climate changes in rate and magnitude.

The United Nations Intergovernmental Panel on Climate Change (IPCC) constructed several emission trajectories of GHGs needed to stabilize global temperatures and climate change impacts. In its Fourth Assessment Report, the IPCC predicted that the global mean temperature change from 1990 to 2100, given six scenarios, could range from 1.1 degrees Celsius (°C) to 6.4°C. Regardless of analytical methodology, global average temperatures and sea levels are expected to rise under all scenarios.⁶ The report also concluded that “[w]arming of the climate system is unequivocal,” and that “[m]ost of the observed increase in global average temperatures since the mid-20th century is very likely due to the observed increase in anthropogenic greenhouse gas concentrations.”

An individual project cannot generate enough GHG emissions to cause a discernible change in global climate. However, the Project participates in the potential for global climate change by its incremental contribution of GHGs—and when combined with the cumulative increase of all other sources of GHGs—constitute potential influences on global climate change.

3.1 REGULATORY SETTING

3.1.1 FEDERAL

FEDERAL CLEAN AIR ACT

EPA is the federal agency responsible for executing the federal Clean Air Act (CAA) and its amendments. In 2007, the U.S. Supreme Court ruled that carbon dioxide (CO₂) is an air pollutant, as defined under the CAA, and thus the EPA has the authority to regulate GHG emissions. The ruling resulted in the EPA taking steps to regulate GHG emissions and lend support to State and local agency in their efforts to reduce GHG emissions.

FEDERAL REGULATIONS FOR VEHICLE FUEL ECONOMY STANDARDS

The EPA and the National Highway Traffic Safety Administration (NHTSA) in 2012 issued final rules to reduce GHG emissions and improve the Corporate Average Fuel Economy (CAFE) standards for light-duty vehicles of model years 2017 and beyond. These CAFE standards have been enacted since 1978 under the Energy Policy and Conservation Act. This program requires automobile manufacturers to build a single nation light-duty fleet that meets both the requirements under federal programs and those of California and other states. This program would improve fuel economy to 54.5 miles per gallon-equivalent, limiting vehicle emissions to 153 grams of CO₂ per mile for the fleet of cars and light-duty trucks by model year 2025, which represents five percent annual increases in fuel economy.

The EPA and NHTSA jointly published in 2018 a notice of proposed rulemaking entitled “The Safer Affordable Fuel-Efficient Vehicles Rule for Model Years 2021-2026 Passenger Cars and Light Trucks” (SAFE Rule), which proposed:

- (1) new and amended CO₂ and CAFE standards for passenger cars and light trucks;

⁶ (Intergovernmental Panel on Climate Change, 2007)

- (2) to withdraw the waiver EPA had previously provided to California for that State's GHG and zero emission vehicle (ZEV) programs under Section 209 of the Clean Air Act, and;
- (3) regulatory text to implement NHTSA's statutory authority to set nationally applicable fuel economy standards to explicitly preempt California's GHG and ZEV programs.

In 2019, Part One of the SAFE Rule (One National Program) became effective, which withdrew California's waiver from EPA and finalized NHTSA's regulatory text related to preemption of State regulations. In 2020, EPA and NHTSA announced Part Two of the SAFE Rule, which would establish amended fuel economy and CO₂ standards for passenger cars and light trucks of model years 2021-2026. These revised standards would increase in stringency by 1.5 percent per year from model year 2020 over model years 2021-2026.

3.1.2 STATE

EXECUTIVE ORDER (EO) S-3-05

In 2005, Governor Schwarzenegger issued EO S-3-05, proclaiming that California is vulnerable to the impacts of climate change. The EO declares that increasing temperatures could reduce the Sierra Nevada snowpack, further exacerbate California's air quality problems, and potentially cause a rise in sea levels. To address those concerns, the EO established GHG emission targets for the State and identified responsibilities for State agencies in meeting the targets. Specifically, statewide emissions are to be reduced to 2000 levels by 2010, 1990 levels by 2020, and to 80 percent below 1990 levels by 2050.

AB 32

In 2006, AB 32, the California Global Warming Solutions Act of 2006, was signed into law. AB 32 establishes regulations, reporting requirements, and market mechanisms to achieve quantifiable reductions in GHG emissions and a cap on statewide GHG emissions. AB 32 requires that statewide GHG emissions be reduced to 1990 levels by 2020. AB 32 also requires that:

- “(a) the statewide greenhouse gas emissions limit shall remain in effect unless otherwise amended or repealed.
- (b) It is the intent of the Legislature that the statewide greenhouse gas emissions limit continue in existence and be used to maintain and continue reductions in emissions of greenhouse gases beyond 2020.
- (c) The [CARB] shall make recommendations to the Governor and the Legislature on how to continue reductions of greenhouse gas emissions beyond 2020. [California Health and Safety Code, Division 25.5, Part 3, Section 38551]

EO B-30-15

In 2015, Governor Brown issued EO B-30-15 which established a California GHG reduction target of 40 percent below 1990 levels by 2030. This emission reduction target of 40 percent below 1990 levels by 2030 set the next interim step in the State's continuing efforts to pursue the long-term target previously established under EO S-3-05 to reach the goal of reducing emissions 80 percent below 1990 levels by 2050. This is consistent with scientifically established levels needed in the U.S. to limit global warming below 2 degrees Celsius, the threshold at which major climate disruptions are projected, such as super droughts and rising sea levels.

SB 32

In 2016, SB 32 was signed into law and serve to extend California's GHG reduction programs beyond 2020. SB 32 amended existing regulations to authorize CARB to achieve a statewide GHG emission reduction of at least 40 percent below 1990 levels by no later than December 31, 2030, codifying the 2030 target established by EO B-30-15.

AB (AB) 1493 (PAVLEY)

AB 1493, enacted in 2002, requires the reduction of GHGs from automobiles and light-duty trucks to the maximum extent feasible and cost-effective. In 2004, CARB approved the “Pavley I” regulations that applied to new passenger vehicles beginning with model year 2009 through 2016. Pavley I was anticipated to reduce GHG emissions from regulated vehicles by 30 percent from 2002 levels by 2016. Pavley II was incorporated into Amendments to the Low-Emission Vehicle Program referred to as LEV III. The amendments, which took effect in 2012, apply to vehicles for model years 2017 through 2025. The regulation will reduce GHGs from new cars by 34 percent from 2016 levels by 2025.

ADVANCED CLEAN CARS PROGRAM

Also in 2012, CARB approved the Advanced Clean Cars program which sought to combine the control of GHG emissions and criteria air pollutants, as well as requirements for greater numbers of zero-emission vehicles, into a single package of regulatory standards for vehicle model years 2017 through 2025. These regulations strengthen the GHG standard for 2017 models and beyond and would be achieved through existing and more efficient technologies. The program’s ZEV regulation would require battery, fuel cell, and/or plug-in hybrid electric vehicles to comprise up to 15 percent of California’s new vehicle sales by 2025. The program also included a clean fuels outlet regulation designed to support the development of zero-emission hydrogen fuel cell vehicles by requiring increased numbers of hydrogen fueling stations throughout the state. By 2025, when it was assumed, the rules would be fully implemented, the statewide fleet of new cars and light trucks would emit 34 percent fewer GHGs and 75 percent fewer smog-forming emissions than the statewide fleet in 2016.

SB 100

In 2018, SB 100 increased California’s Renewable Energy Portfolio targets for utility companies to 52 percent renewables by 2027 and 60 percent renewables by 2030. It also established a new zero-carbon electricity mandate by 2040.

CALIFORNIA BUILDING ENERGY EFFICIENCY STANDARDS (TITLE 24, PART 6)

California Code of Regulations (CCR), Title 24, Part 6, is California’s Energy Efficiency Standards for Residential and Non-Residential Buildings. Title 24 Part 6 was established by California Energy Commission (CEC) in 1978 in response to a legislative mandate to create uniform building codes to reduce California’s energy consumption and provide energy-efficiency standards for residential and non-residential buildings. These standards are updated triennially and have resulted in substantial gains in energy efficiency in new construction with each code update cycle.

The 2022 Title 24 Part 6 Building Energy Efficiency Standards were adopted by CEC in 2021 and took effect in 2023. The standards are designed to move the State closer to its zero net energy goals for new residential development. It does so by requiring all new residences to install enough renewable energy to offset all the site electricity needs of each residential unit. CEC estimates that the 2022 Energy Code would provide \$1.5 billion in consumer benefits and reduce 10 million metric tons of GHGs.⁷

The Title 24 Building Energy Efficiency Standards are enforced through the local plan check and building permit process. Local government agencies may adopt and enforce additional energy standards for new buildings as reasonably necessary in response to local climatologic, geologic, or topographic conditions, provided that these standards are demonstrated to be cost effective and exceed the energy performance required by Title 24 Part 6.

⁷ (California Energy Commission, 2021)

CALIFORNIA GREEN BUILDING STANDARDS (TITLE 24, PART 11)

In 2008, the California Building Standards Commission adopted Part 11 of CCR Title 24, titled the California Green Building Standards Code (CALGreen Code) which became effective in 2009 as a voluntary code. The 2010 CALGreen Code was the first mandatory edition and took effect in 2011 and is now a part of the triennial code update cycle. The CALGreen Code establishes mandatory measures for residential and non-residential building construction and encourages sustainable construction practices in the following five categories: (1) planning and design, (2) energy efficiency, (3) water efficiency and conservation, (4) material conservation and resource efficiency, and (5) indoor environmental quality. Although the CALGreen Code was adopted as part of the State's efforts to reduce GHG emissions, the CALGreen Code standards have co-benefits of reducing energy consumption from residential and non-residential buildings subject to the standard.

SB 97

SB 97, enacted in 2007, amended the CEQA statute to clearly establish that GHG emissions and the effects of GHG emissions are appropriate subjects for CEQA analysis. The legislation directed the California Office of Planning and Research to develop draft CEQA Guidelines "for the mitigation of GHG emissions or the effects of GHG emissions" and directed the California Natural Resources Agency to certify and adopt the State CEQA Guidelines. CEQA Guidelines Section 15183.5, Tiering and Streamlining the Analysis of GHG Emissions, was added as part of the CEQA Guideline amendments that became effective in 2010 and describes the criteria needed in a GHG reduction plan that would allow for the tiering and streamlining of CEQA analysis for development projects.

SB X7-7

SB X7-7 requires water suppliers to reduce urban per capita water consumption 20 percent from a baseline level by 2020. The production and treatment of water, as well as the treatment of wastewater, requires substantial amount of electricity, and thus there this a direct relationship between water and greenhouse gases.

CALIFORNIA INTEGRATED WASTE MANAGEMENT ACT

To minimize the amount of solid waste that must be disposed of in landfills, the State Legislature passed the California Integrated Waste Management Act of 1989 (AB 939), effective January 1990. According to AB 939, all cities and counties were required to divert 25 percent of all solid waste from landfill facilities by 1995, and 50 percent by 2000. Through other statutes and regulations, this 50 percent diversion rate also applies to State agencies. In order of priority, waste reduction efforts must promote source reduction, recycling and composting, and environmentally safe transformation and land disposal.

In 2011, AB 341 modified the California Integrated Waste Management Act and directed the California Department of Resources Recycling and Recovery to develop and adopt regulations for mandatory commercial recycling. The resulting Mandatory Commercial Recycling Regulation (2012) requires that after 2012, certain businesses that generate four cubic yards or more commercial solid waste per week shall arrange recycling services. To comply with this requirement, businesses may either separate recyclables and self-haul them or subscribe to a recycling service that includes mixed waste processing. AB 341 also established a statewide recycling goal of 75 percent; the 50 percent disposal reduction mandate still applies for cities and counties under AB 939, the Integrated Waste Management Act.

CLIMATE CHANGE SCOPING PLAN

In 2022, the CARB adopted the 2022 Scoping Plan, which provides a framework for achieving the State's 2030 GHG emissions reduction target of 40 percent below 1990 levels and substantially advance toward our 2045 climate goal to reduce GHG emissions by 85 percent below 1990 levels. The 2022 Scoping Plan relies on the continuation and expansion of existing policies and regulations, such as the Cap-and-Trade Program, and implementation of recently adopted policies and legislation. The 2022 Scoping Plan includes

a wide variety of goals related to energy efficiency and renewable energy that are intended to help meet the State's targets.⁸

CAP-AND-TRADE PROGRAM

The Cap-and-Trade program was developed to reduce GHG emissions from major emissions sources (covered entities) by setting a firm cap on statewide GHG emissions that is gradually reduced over time while employing market mechanisms to cost-effectively achieve the State's emission-reduction goals. It sets a statewide limit on sources responsible for 85 percent of California's GHG emissions, including electricity generators, large industrial facilities emitting a specified amount of annual emissions, and distributors of transportation, natural gas, and other fuels, and establishes a price signal needed to drive long-term investment in cleaner fuels and more efficient use of energy. The program is designed to provide the approximately 450 entities covered by the program with the flexibility to seek out and implement the lowest cost options to reduce emissions. All covered entities are required to demonstrate compliance with the cap-and-trade program by implementing GHG reduction activities on-site or through use of free or purchased allowances, or purchase of offsets.

3.1.3 LOCAL

The City of Fresno adopted its General Plan in December 2014. The applicable air quality goals and policies from the General Plan are listed below.

Policy RC-4-a: Support Regional Efforts. Fresno City supports federal and state programs that improve air quality. The city encourages monitoring and control efforts of mobile and stationary sources.

Policy RC-4-b Conditions of Approval. The city shall develop and incorporate maintenance requirements for approval conditions. These standards are subject to the General Plan amendments, community plans, Specific Plans, neighborhood plans, Concept Plans, and development proposals

Policy RC-4-e Support Employer-Based Efforts. Employers are encouraged to minimize traffic congestion. Employers may stagger work hours, incentivize the use of carpools, incentivize public transit, or take other measures.

Policy RC-4-k Electric Vehicle Charging. Fresno City will develop standards for vehicle charging infrastructure, which will be applicable to both private and publicly owned land. The city is encouraging charging infrastructure as the technology grows.

Policy RC-5-c GHG Reduction through Design and Operations. This policy, RC-5-c, encourages the effort to include GHG emission reduction requirements for entitlement decisions, facility design, and operational measures.

Policy RC-5-e Ensure Compliance. This measure ensures that ongoing compliance with GHG reduction plans is being met. It incorporates compliance into the project's design, conditions of approval, and mitigation measures.

Policy RC-5-f Toolkit. The city will provide feasible measures, as a toolkit, to reduce emissions for project applicants or residents.

⁸ (California Air Resources Board, 2017)

3.2 THRESHOLD OF SIGNIFICANCE

The City of Fresno does not have a current greenhouse gas reduction plan, and the SJVAPCD also does not have adopted thresholds of significance for greenhouse gas emissions. Therefore, in the absence of any City or SJVAPCD specific guidelines or thresholds, this analysis evaluates the proposed project for consistency with the Bay Area Air Quality Management District (BAAQMD) Justification Report: CEQA Thresholds for Evaluating the Significance of Climate Impacts from Land Use Projects and Plans (Justification Report).⁹

In April 2022, the BAAQMD adopted the Justification Report, which identifies applicable greenhouse gas significance thresholds. These thresholds establish whether a project would be consistent with California's efforts to meet long-term climate goals as established in the State's 2022 Scoping Plan, including achieving carbon neutrality by 2045. If a project is designed and built to incorporate design elements related to natural gas, energy, VMT, and EVs, then it would contribute its portion of what is necessary to achieve California's long-term climate goals — its "fair share" — and an agency reviewing the project under CEQA can conclude that the project would not make a cumulatively considerable contribution to global climate change.

The Justification Report provides substantial evidence supporting the use of their thresholds for projects throughout California because the thresholds are applicable to meeting the State's established greenhouse gas reduction goals. In the absence of any City or SJVAPCD specific guidelines or thresholds, this analysis evaluates the proposed project for consistency with the identified project design elements as the applicable thresholds of significance to establish if the proposed project is achieving its "fair share" of emission reductions to support long-term State goals for greenhouse gas emissions and carbon neutrality.

According to the Justification Report, a project would have a less-than-significant impact related to greenhouse gas emissions if it would include 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 electrical 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 requirements in the most recently adopted version of CALGreen Tier 2.

The City of Fresno adopted CEQA Guidelines for Vehicle Miles Traveled Thresholds that identify City thresholds as 14 VMT per Capita Threshold for residential land uses and a 22.3 VMT per employee threshold

⁹ (Bay Area Air Quality Management District, 2022)

for employee-based land uses. The 22.3 VMT per employee threshold VMT threshold will be used in this analysis.

3.3 METHODOLOGY

3.3.1 SHORT-TERM CONSTRUCTION-GENERATED EMISSIONS

Short-term construction emissions associated with the Project were calculated CalEEMod, Version 2022.1. These output files can be found in [Appendix A](#). The sections below detail the methodology of the air quality emissions analysis and its conclusions. The emissions modeling includes emissions generated by off-road equipment, haul trucks, and worker commute trips.

3.3.2 LONG-TERM OPERATIONAL EMISSIONS

Operational emissions occur over the lifetime of the Project and are from three main sources: area sources, energy usage, and motor vehicles usage known as mobile sources. Area source emissions include emissions from natural gas, landscape, and painting. The Project is expected to commence operations as early as 2026 and was used as the Project buildout modeling year. Modeling assumptions and output files are included in [Appendix A](#).

3.4 IMPACT ANALYSIS

3.4.1 GREENHOUSE GAS INVENTORY

Impact GHG-1: The project would generate direct and indirect greenhouse gas emissions; however, these emissions would not result in a significant impact on the environment, should the project install EV chargers consistent with the most recently adopted version of CALGreen Tier 2

IMPACT ANALYSIS

Construction

Total GHG emissions generated during all phases of construction were combined and are presented in [Table 3-1](#). The BAAQMD does not recommend assessing the significance of construction-related emissions. However, other jurisdictions, such as the SCAQMD, have concluded that construction emissions should be included since they may remain in the atmosphere for years after construction is complete. In order to account for the construction emissions, amortization of the total emissions generated during construction were based on the life of the development (nonresidential—30 years) and added to the operational emissions.

Table 3-1: Construction Emissions, Greenhouse Gases

	MTCO ₂ e
Total Construction Emissions	183.1
Amortized over 30 years	6.10
Notes: Calculation totals use unrounded numbers from CalEEMod output. Source: Appendix A	

Operations

Total GHG emissions generated during operations are presented in [Table 3-2](#). The amortized construction emissions have been added to the operational emissions generated by the Project. On opening day, the Project would result in approximately 327 MTCO₂e resulting from operational activities. Operational emissions are anticipated to decrease over time as older vehicles are replaced with newer vehicles that emit fewer to no greenhouse gases.

Table 3-2: Operational Emissions, Greenhouse Gases

	MTCO ₂ e
Operational Emissions	321.0
Amortized Construction Emissions	6.10
Total Operational Emissions plus Amortized Construction Emissions	327.10
Notes: Calculation totals use unrounded numbers from CalEEMod output. Source: Appendix A	

In the absence of any City or SJVAPCD specific guidelines or thresholds, this analysis evaluates the proposed project for consistency with the BAAQMD Justification Report, which identifies project design elements as the applicable thresholds of significance. If a project is designed and built to incorporate design elements related to natural gas, energy, VMT, and EVs, then it would contribute its portion of what is necessary to achieve California’s long-term climate goals — its “fair share” — and an agency reviewing the project under CEQA can conclude that the project would not make a cumulatively considerable contribution to global climate change.

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

Energy Use. Under this design criterion, the project must not result in any wasteful, inefficient, or unnecessary energy usage as determined by the analysis required under CEQA Section 21100(b)(3) and Section 15126.2(b) of the State CEQA Guidelines. The project would utilize approximately 468,928 kilowatt-hours of energy annually. Energy usage would be regulated by Titles 20 and 24 of the California Code of Regulations, which regulate energy usage with regards to equipment and building energy efficiency. For these reasons, the proposed project would be consistent with this design element.

Vehicle Miles Traveled. As discussed above, development that meets a locally adopted SB 743 VMT target would be considered to have a less than significant GHG emissions impact from transportation sources. In accordance with the City’s VMT guidelines, and the trip generation analysis prepared under separate cover, the proposed project would screen out of VMT requirements and would have a less than significant GHG emissions impact from transportation sources.

Electric Vehicle Requirements. Under this design criterion, the project must demonstrate consistency with the Tier 2 measures for off-street EV parking included in the most recently adopted version of the CALGreen Code. The proposed project does not propose EV parking spaces beyond the mandatory CalGreen amounts. Therefore, the proposed project would not comply with this project design element.

The proposed project would not be consistent with the project design elements related to natural gas, energy, VMT, and EVs, which demonstrate that the project is achieving its “fair share” of GHG emission reductions. However, the proposed project would not generate substantial greenhouse gas emissions, or conflict with plans, policies, or regulations adopted for the purpose of reducing GHG emissions, and the impact would be less than significant, with the implementation of Mitigation Measure GHG-1.

Mitigation Measure GHG-1: The proposed project shall comply with the off-street electric vehicle requirements in the most recently adopted version of CALGreen Tier 2.

3.4.2 GREENHOUSE GAS REDUCTION PLANS

Impact GHG-2: The project would not conflict with any applicable plan, policy, or regulation of an agency adopted to reduce the emissions of greenhouse gases.

IMPACT ANALYSIS

As shown in discussion in Section 3.4.1 above, the proposed project would not be consistent with the State’s greenhouse gas reduction goals, without the implementation of Mitigation Measure GHG-1, discussed above. Therefore, the proposed project would not conflict with plans, policies, or regulations adopted for the purpose of reducing GHG emissions. The impact would be less than significant.

4 CONCLUSION

As described above, the Project would result in less than significant impacts for all air quality and GHG impact criteria analyzed, with mitigation required for clean diesel construction equipment and EV chargers.

Table 4-1: Impact Summary

Impact	Appendix G Question	Result
AIR-1	The project would not conflict with or obstruct implementation of the applicable air quality plan.	Less than Significant Impact.
AIR-2	The project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard (including releasing emissions, which exceed quantitative thresholds for ozone precursors).	Less than Significant Impact.
AIR-3	The project would not expose sensitive receptors to substantial pollutant concentrations, with the implementation of Tier 3 diesel engines with Level 3 Diesel Particulate Filters or Tier 4 diesel engines, on all diesel engines of 50 horsepower or greater.	Less than Significant Impact with Mitigation.
AIR-4	The project would not create objectionable odors affecting a substantial number of people.	Less than Significant Impact.
GHG-1	The project would generate direct and indirect greenhouse gas emissions; however, these emissions would not result in a significant impact on the environment, should the project install EV chargers consistent with the most recently adopted version of CALGreen Tier 2.	Less than Significant Impact with Mitigation.
GHG-2	The project would not conflict with any applicable plan, policy or regulation of an agency adopted to reduce the emissions of greenhouse gases, should the project install EV chargers consistent with the most recently adopted version of CALGreen Tier 2.	Less than Significant Impact with Mitigation.

Table 4-2: Mitigation Measures

#	Measure
AIR-1	Diesel-powered construction equipment of 50 horsepower or greater shall meet EPA Tier 3 standards and be equipped with a Level 3 diesel particulate filter, or shall meet EPA Tier 4 standards.
GHG-1	The proposed project shall comply with the off-street electric vehicle requirements in the most recently adopted version of CALGreen Tier 2.

5 REFERENCES

- Bay Area Air Quality Management District. (2022, April). *Air Quality Guidelines Appendix B: CEQA Thresholds for Evaluating the Significance of Climate Impacts From Land Use Projects and Plans*. Retrieved from https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa-guidelines-2022/appendix-b-thresholds-for-evaluating-significance-of-climate-impacts_final-pdf.pdf?rev=10305f45037b41dba2cd1b45b288d54b&sc_lang=en
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6 APPENDIX A

Air Quality Output Files

Granite Park PACE Facility Detailed Report

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1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	Granite Park PACE Facility
Construction Start Date	1/1/2026
Operational Year	2026
Lead Agency	City of Fresno
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	2.70
Precipitation (days)	25.4
Location	36.792158679363084, -119.75401431098106
County	Fresno
City	Fresno
Air District	San Joaquin Valley APCD
Air Basin	San Joaquin Valley
TAZ	2450
EDFZ	5
Electric Utility	Pacific Gas & Electric Company
Gas Utility	Pacific Gas & Electric
App Version	2022.1.1.30

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
Medical Office Building	20.0	1000sqft	0.46	20,000	0.00	—	—	—

Parking Lot	0.69	Acre	0.69	0.00	0.00	—	—	—
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1.3. User-Selected Emission Reduction Measures by Emissions Sector

Sector	#	Measure Title
Construction	C-6	Use Diesel Particulate Filters

2. Emissions Summary

2.1. Construction Emissions Compared Against Thresholds

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

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.25	1.04	8.65	10.2	0.02	0.29	0.05	0.34	0.27	0.01	0.28	—	1,881	1,881	0.08	0.02	0.23	1,890
Mit.	1.25	1.04	8.65	10.2	0.02	0.16	0.05	0.21	0.15	0.01	0.16	—	1,881	1,881	0.08	0.02	0.23	1,890
% Reduced	—	—	—	—	—	45%	—	39%	45%	—	43%	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	10.3	10.2	12.9	14.3	0.02	0.58	7.14	7.72	0.53	3.44	3.97	—	2,508	2,508	0.10	0.02	0.01	2,517
Mit.	10.3	10.2	12.9	14.3	0.02	0.16	7.14	7.22	0.15	3.44	3.52	—	2,508	2,508	0.10	0.02	0.01	2,517
% Reduced	—	—	—	—	—	72%	—	6%	72%	—	11%	—	—	—	—	—	—	—
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.01	0.89	5.09	6.01	0.01	0.18	0.14	0.31	0.16	0.06	0.22	—	1,101	1,101	0.04	0.01	0.06	1,106
Mit.	1.01	0.89	5.09	6.01	0.01	0.09	0.14	0.23	0.08	0.06	0.15	—	1,101	1,101	0.04	0.01	0.06	1,106

% Reduced	—	—	—	—	—	48%	—	27%	48%	—	35%	—	—	—	—	—	—	—
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.18	0.16	0.93	1.10	< 0.005	0.03	0.03	0.06	0.03	0.01	0.04	—	182	182	0.01	< 0.005	0.01	183
Mit.	0.18	0.16	0.93	1.10	< 0.005	0.02	0.03	0.04	0.02	0.01	0.03	—	182	182	0.01	< 0.005	0.01	183
% Reduced	—	—	—	—	—	48%	—	27%	48%	—	35%	—	—	—	—	—	—	—

2.2. Construction Emissions by Year, Unmitigated

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

Year	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	1.25	1.04	8.65	10.2	0.02	0.29	0.05	0.34	0.27	0.01	0.28	—	1,881	1,881	0.08	0.02	0.23	1,890
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	10.3	10.2	12.9	14.3	0.02	0.58	7.14	7.72	0.53	3.44	3.97	—	2,508	2,508	0.10	0.02	0.01	2,517
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	1.01	0.89	5.09	6.01	0.01	0.18	0.14	0.31	0.16	0.06	0.22	—	1,101	1,101	0.04	0.01	0.06	1,106
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	0.18	0.16	0.93	1.10	< 0.005	0.03	0.03	0.06	0.03	0.01	0.04	—	182	182	0.01	< 0.005	0.01	183

2.3. Construction Emissions by Year, Mitigated

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

Year	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
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Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	1.25	1.04	8.65	10.2	0.02	0.16	0.05	0.21	0.15	0.01	0.16	—	1,881	1,881	0.08	0.02	0.23	1,890
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	10.3	10.2	12.9	14.3	0.02	0.16	7.14	7.22	0.15	3.44	3.52	—	2,508	2,508	0.10	0.02	0.01	2,517
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	1.01	0.89	5.09	6.01	0.01	0.09	0.14	0.23	0.08	0.06	0.15	—	1,101	1,101	0.04	0.01	0.06	1,106
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	0.18	0.16	0.93	1.10	< 0.005	0.02	0.03	0.04	0.02	0.01	0.03	—	182	182	0.01	< 0.005	0.01	183

2.4. Operations Emissions Compared Against Thresholds

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

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.42	1.35	0.76	5.52	0.01	0.03	0.80	0.82	0.02	0.20	0.23	121	1,549	1,670	12.2	0.07	3.91	2,001
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.18	1.12	0.83	4.23	0.01	0.02	0.80	0.82	0.02	0.20	0.23	121	1,463	1,584	12.3	0.07	0.60	1,913
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.26	1.20	0.80	4.58	0.01	0.02	0.78	0.81	0.02	0.20	0.22	121	1,488	1,609	12.2	0.07	1.98	1,939
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.23	0.22	0.15	0.84	< 0.005	< 0.005	0.14	0.15	< 0.005	0.04	0.04	20.1	246	266	2.03	0.01	0.33	321

2.5. Operations Emissions by Sector, Unmitigated

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

Sector	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.78	0.74	0.54	4.47	0.01	0.01	0.80	0.80	0.01	0.20	0.21	—	1,007	1,007	0.05	0.05	3.40	1,027
Area	0.61	0.60	0.01	0.87	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	3.58	3.58	< 0.005	< 0.005	—	3.59
Energy	0.02	0.01	0.21	0.18	< 0.005	0.02	—	0.02	0.02	—	0.02	—	533	533	0.07	0.01	—	536
Water	—	—	—	—	—	—	—	—	—	—	—	4.81	5.52	10.3	0.49	0.01	—	26.2
Waste	—	—	—	—	—	—	—	—	—	—	—	116	0.00	116	11.6	0.00	—	407
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.51	0.51
Total	1.42	1.35	0.76	5.52	0.01	0.03	0.80	0.82	0.02	0.20	0.23	121	1,549	1,670	12.2	0.07	3.91	2,001
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.70	0.65	0.61	4.05	0.01	0.01	0.80	0.80	0.01	0.20	0.21	—	925	925	0.06	0.06	0.09	943
Area	0.46	0.46	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Energy	0.02	0.01	0.21	0.18	< 0.005	0.02	—	0.02	0.02	—	0.02	—	533	533	0.07	0.01	—	536
Water	—	—	—	—	—	—	—	—	—	—	—	4.81	5.52	10.3	0.49	0.01	—	26.2
Waste	—	—	—	—	—	—	—	—	—	—	—	116	0.00	116	11.6	0.00	—	407
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.51	0.51
Total	1.18	1.12	0.83	4.23	0.01	0.02	0.80	0.82	0.02	0.20	0.23	121	1,463	1,584	12.3	0.07	0.60	1,913
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.71	0.66	0.58	3.97	0.01	0.01	0.78	0.79	0.01	0.20	0.21	—	948	948	0.05	0.05	1.47	967
Area	0.53	0.53	< 0.005	0.43	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.76	1.76	< 0.005	< 0.005	—	1.77
Energy	0.02	0.01	0.21	0.18	< 0.005	0.02	—	0.02	0.02	—	0.02	—	533	533	0.07	0.01	—	536
Water	—	—	—	—	—	—	—	—	—	—	—	4.81	5.52	10.3	0.49	0.01	—	26.2
Waste	—	—	—	—	—	—	—	—	—	—	—	116	0.00	116	11.6	0.00	—	407

Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.51	0.51
Total	1.26	1.20	0.80	4.58	0.01	0.02	0.78	0.81	0.02	0.20	0.22	121	1,488	1,609	12.2	0.07	1.98	1,939
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.13	0.12	0.11	0.72	< 0.005	< 0.005	0.14	0.14	< 0.005	0.04	0.04	—	157	157	0.01	0.01	0.24	160
Area	0.10	0.10	< 0.005	0.08	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.29	0.29	< 0.005	< 0.005	—	0.29
Energy	< 0.005	< 0.005	0.04	0.03	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	88.2	88.2	0.01	< 0.005	—	88.8
Water	—	—	—	—	—	—	—	—	—	—	—	0.80	0.91	1.71	0.08	< 0.005	—	4.34
Waste	—	—	—	—	—	—	—	—	—	—	—	19.3	0.00	19.3	1.93	0.00	—	67.4
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.08	0.08
Total	0.23	0.22	0.15	0.84	< 0.005	< 0.005	0.14	0.15	< 0.005	0.04	0.04	20.1	246	266	2.03	0.01	0.33	321

2.6. Operations Emissions by Sector, Mitigated

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

Sector	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.78	0.74	0.54	4.47	0.01	0.01	0.80	0.80	0.01	0.20	0.21	—	1,007	1,007	0.05	0.05	3.40	1,027
Area	0.61	0.60	0.01	0.87	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	3.58	3.58	< 0.005	< 0.005	—	3.59
Energy	0.02	0.01	0.21	0.18	< 0.005	0.02	—	0.02	0.02	—	0.02	—	533	533	0.07	0.01	—	536
Water	—	—	—	—	—	—	—	—	—	—	—	4.81	5.52	10.3	0.49	0.01	—	26.2
Waste	—	—	—	—	—	—	—	—	—	—	—	116	0.00	116	11.6	0.00	—	407
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.51	0.51
Total	1.42	1.35	0.76	5.52	0.01	0.03	0.80	0.82	0.02	0.20	0.23	121	1,549	1,670	12.2	0.07	3.91	2,001
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.70	0.65	0.61	4.05	0.01	0.01	0.80	0.80	0.01	0.20	0.21	—	925	925	0.06	0.06	0.09	943
Area	0.46	0.46	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Energy	0.02	0.01	0.21	0.18	< 0.005	0.02	—	0.02	0.02	—	0.02	—	533	533	0.07	0.01	—	536
Water	—	—	—	—	—	—	—	—	—	—	—	4.81	5.52	10.3	0.49	0.01	—	26.2
Waste	—	—	—	—	—	—	—	—	—	—	—	116	0.00	116	11.6	0.00	—	407
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.51	0.51
Total	1.18	1.12	0.83	4.23	0.01	0.02	0.80	0.82	0.02	0.20	0.23	121	1,463	1,584	12.3	0.07	0.60	1,913
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.71	0.66	0.58	3.97	0.01	0.01	0.78	0.79	0.01	0.20	0.21	—	948	948	0.05	0.05	1.47	967
Area	0.53	0.53	< 0.005	0.43	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.76	1.76	< 0.005	< 0.005	—	1.77
Energy	0.02	0.01	0.21	0.18	< 0.005	0.02	—	0.02	0.02	—	0.02	—	533	533	0.07	0.01	—	536
Water	—	—	—	—	—	—	—	—	—	—	—	4.81	5.52	10.3	0.49	0.01	—	26.2
Waste	—	—	—	—	—	—	—	—	—	—	—	116	0.00	116	11.6	0.00	—	407
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.51	0.51
Total	1.26	1.20	0.80	4.58	0.01	0.02	0.78	0.81	0.02	0.20	0.22	121	1,488	1,609	12.2	0.07	1.98	1,939
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.13	0.12	0.11	0.72	< 0.005	< 0.005	0.14	0.14	< 0.005	0.04	0.04	—	157	157	0.01	0.01	0.24	160
Area	0.10	0.10	< 0.005	0.08	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.29	0.29	< 0.005	< 0.005	—	0.29
Energy	< 0.005	< 0.005	0.04	0.03	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	88.2	88.2	0.01	< 0.005	—	88.8
Water	—	—	—	—	—	—	—	—	—	—	—	0.80	0.91	1.71	0.08	< 0.005	—	4.34
Waste	—	—	—	—	—	—	—	—	—	—	—	19.3	0.00	19.3	1.93	0.00	—	67.4
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.08	0.08
Total	0.23	0.22	0.15	0.84	< 0.005	< 0.005	0.14	0.15	< 0.005	0.04	0.04	20.1	246	266	2.03	0.01	0.33	321

3. Construction Emissions Details

3.1. Site Preparation (2026) - Unmitigated

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

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

Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.47	1.24	11.0	11.7	0.02	0.51	—	0.51	0.47	—	0.47	—	2,065	2,065	0.08	0.02	—	2,072
Dust From Material Movement	—	—	—	—	—	—	6.26	6.26	—	3.00	3.00	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.06	0.06	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	11.3	11.3	< 0.005	< 0.005	—	11.4
Dust From Material Movement	—	—	—	—	—	—	0.03	0.03	—	0.02	0.02	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.87	1.87	< 0.005	< 0.005	—	1.88
Dust From Material Movement	—	—	—	—	—	—	0.01	0.01	—	< 0.005	< 0.005	—	—	—	—	—	—	—

Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.03	0.02	0.21	0.00	0.00	0.04	0.04	0.00	0.01	0.01	—	39.5	39.5	< 0.005	< 0.005	< 0.005	40.1	
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.22	0.22	< 0.005	< 0.005	< 0.005	0.23	
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.04	0.04	< 0.005	< 0.005	< 0.005	0.04	
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	

3.2. Site Preparation (2026) - Mitigated

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

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

Off-Road Equipment	1.47	1.24	11.0	11.7	0.02	0.08	—	0.08	0.07	—	0.07	—	2,065	2,065	0.08	0.02	—	2,072
Dust From Material Movement	—	—	—	—	—	—	6.26	6.26	—	3.00	3.00	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.06	0.06	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	11.3	11.3	< 0.005	< 0.005	—	11.4
Dust From Material Movement	—	—	—	—	—	—	0.03	0.03	—	0.02	0.02	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.87	1.87	< 0.005	< 0.005	—	1.88
Dust From Material Movement	—	—	—	—	—	—	0.01	0.01	—	< 0.005	< 0.005	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.03	0.02	0.21	0.00	0.00	0.04	0.04	0.00	0.01	0.01	—	39.5	39.5	< 0.005	< 0.005	< 0.005	40.1
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.22	0.22	< 0.005	< 0.005	< 0.005	0.23
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.04	0.04	< 0.005	< 0.005	< 0.005	0.04
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.3. Grading (2026) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.70	1.42	12.9	14.0	0.02	0.58	—	0.58	0.53	—	0.53	—	2,455	2,455	0.10	0.02	—	2,463

Dust From Material Movement	—	—	—	—	—	—	7.08	7.08	—	3.42	3.42	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.02	0.14	0.15	< 0.005	0.01	—	0.01	0.01	—	0.01	—	26.9	26.9	< 0.005	< 0.005	—	27.0
Dust From Material Movement	—	—	—	—	—	—	0.08	0.08	—	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	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.03	0.03	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	4.45	4.45	< 0.005	< 0.005	—	4.47
Dust From Material Movement	—	—	—	—	—	—	0.01	0.01	—	0.01	0.01	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.04	0.04	0.03	0.28	0.00	0.00	0.05	0.05	0.00	0.01	0.01	—	52.7	52.7	< 0.005	< 0.005	0.01	53.5

Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.60	0.60	< 0.005	< 0.005	< 0.005	0.61
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.10	0.10	< 0.005	< 0.005	< 0.005	0.10
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.4. Grading (2026) - Mitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.70	1.42	12.9	14.0	0.02	0.09	—	0.09	0.08	—	0.08	—	2,455	2,455	0.10	0.02	—	2,463
Dust From Material Movement	—	—	—	—	—	—	7.08	7.08	—	3.42	3.42	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.02	0.14	0.15	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	26.9	26.9	< 0.005	< 0.005	—	27.0
Dust From Material Movement	—	—	—	—	—	—	0.08	0.08	—	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	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.03	0.03	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	4.45	4.45	< 0.005	< 0.005	—	4.47
Dust From Material Movement	—	—	—	—	—	—	0.01	0.01	—	0.01	0.01	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.04	0.04	0.03	0.28	0.00	0.00	0.05	0.05	0.00	0.01	0.01	—	52.7	52.7	< 0.005	< 0.005	0.01	53.5
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.60	0.60	< 0.005	< 0.005	< 0.005	0.61

Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.10	0.10	< 0.005	< 0.005	< 0.005	0.10	
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.5. Building Construction (2026) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.22	1.01	8.57	9.96	0.02	0.29	—	0.29	0.27	—	0.27	—	1,801	1,801	0.07	0.01	—	1,807
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.22	1.01	8.57	9.96	0.02	0.29	—	0.29	0.27	—	0.27	—	1,801	1,801	0.07	0.01	—	1,807
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	0.67	0.56	4.70	5.46	0.01	0.16	—	0.16	0.15	—	0.15	—	987	987	0.04	0.01	—	990
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	0.12	0.10	0.86	1.00	< 0.005	0.03	—	0.03	0.03	—	0.03	—	163	163	0.01	< 0.005	—	164
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.03	0.01	0.22	0.00	0.00	0.03	0.03	0.00	0.01	0.01	—	38.0	38.0	< 0.005	< 0.005	0.13	38.6
Vendor	< 0.005	< 0.005	0.07	0.03	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	42.3	42.3	< 0.005	0.01	0.10	44.3
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.02	0.02	0.18	0.00	0.00	0.03	0.03	0.00	0.01	0.01	—	33.7	33.7	< 0.005	< 0.005	< 0.005	34.3
Vendor	< 0.005	< 0.005	0.07	0.03	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	42.4	42.4	< 0.005	0.01	< 0.005	44.3
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.10	0.00	0.00	0.02	0.02	0.00	< 0.005	< 0.005	—	19.1	19.1	< 0.005	< 0.005	0.03	19.5
Vendor	< 0.005	< 0.005	0.04	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	23.2	23.2	< 0.005	< 0.005	0.02	24.3
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	3.17	3.17	< 0.005	< 0.005	0.01	3.22

Vendor	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	3.84	3.84	< 0.005	< 0.005	< 0.005	4.02
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.6. Building Construction (2026) - Mitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.22	1.01	8.57	9.96	0.02	0.16	—	0.16	0.15	—	0.15	—	1,801	1,801	0.07	0.01	—	1,807
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.22	1.01	8.57	9.96	0.02	0.16	—	0.16	0.15	—	0.15	—	1,801	1,801	0.07	0.01	—	1,807
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.67	0.56	4.70	5.46	0.01	0.09	—	0.09	0.08	—	0.08	—	987	987	0.04	0.01	—	990
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	0.12	0.10	0.86	1.00	< 0.005	0.02	—	0.02	0.01	—	0.01	—	163	163	0.01	< 0.005	—	164
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.03	0.01	0.22	0.00	0.00	0.03	0.03	0.00	0.01	0.01	—	38.0	38.0	< 0.005	< 0.005	0.13	38.6
Vendor	< 0.005	< 0.005	0.07	0.03	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	42.3	42.3	< 0.005	0.01	0.10	44.3
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.02	0.02	0.18	0.00	0.00	0.03	0.03	0.00	0.01	0.01	—	33.7	33.7	< 0.005	< 0.005	< 0.005	34.3
Vendor	< 0.005	< 0.005	0.07	0.03	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	42.4	42.4	< 0.005	0.01	< 0.005	44.3
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.10	0.00	0.00	0.02	0.02	0.00	< 0.005	< 0.005	—	19.1	19.1	< 0.005	< 0.005	0.03	19.5
Vendor	< 0.005	< 0.005	0.04	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	23.2	23.2	< 0.005	< 0.005	0.02	24.3
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	3.17	3.17	< 0.005	< 0.005	0.01	3.22
Vendor	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	3.84	3.84	< 0.005	< 0.005	< 0.005	4.02
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.7. Paving (2026) - Unmitigated

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

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

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.56	0.47	4.41	6.48	0.01	0.18	—	0.18	0.17	—	0.17	—	991	991	0.04	0.01	—	995
Paving	0.18	0.18	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.01	0.12	0.18	< 0.005	0.01	—	0.01	< 0.005	—	< 0.005	—	27.2	27.2	< 0.005	< 0.005	—	27.3
Paving	< 0.005	< 0.005	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.02	0.03	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	4.50	4.50	< 0.005	< 0.005	—	4.51
Paving	< 0.005	< 0.005	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.05	0.04	0.03	0.35	0.00	0.00	0.07	0.07	0.00	0.02	0.02	—	65.9	65.9	< 0.005	< 0.005	0.01	66.9
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.87	1.87	< 0.005	< 0.005	< 0.005	1.90
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.31	0.31	< 0.005	< 0.005	< 0.005	0.31
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.8. Paving (2026) - Mitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.56	0.47	4.41	6.48	0.01	0.07	—	0.07	0.06	—	0.06	—	991	991	0.04	0.01	—	995
Paving	0.18	0.18	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.01	0.12	0.18	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	—	27.2	27.2	< 0.005	< 0.005	—	27.3
Paving	< 0.005	< 0.005	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.02	0.03	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	—	4.50	4.50	< 0.005	< 0.005	—	4.51
Paving	< 0.005	< 0.005	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.05	0.04	0.03	0.35	0.00	0.00	0.07	0.07	0.00	0.02	0.02	—	—	65.9	65.9	< 0.005	< 0.005	0.01	66.9
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	—	1.87	1.87	< 0.005	< 0.005	< 0.005	1.90
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	—	0.00	0.00	0.00	0.00	0.00	0.00

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.31	0.31	< 0.005	< 0.005	< 0.005	0.31
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.9. Architectural Coating (2026) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.15	0.12	0.86	1.13	< 0.005	0.02	—	0.02	0.02	—	0.02	—	134	134	0.01	< 0.005	—	134
Architectural Coatings	10.1	10.1	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.02	0.03	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	3.66	3.66	< 0.005	< 0.005	—	3.67
Architectural Coatings	0.28	0.28	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

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	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	< 0.005	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	—	0.61	0.61	< 0.005	< 0.005	—	0.61
Architectural Coatings	0.05	0.05	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.04	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	—	6.75	6.75	< 0.005	< 0.005	< 0.005	6.85
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	—	0.19	0.19	< 0.005	< 0.005	< 0.005	0.19
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	—	0.03	0.03	< 0.005	< 0.005	< 0.005	0.03
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	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	—	0.00	0.00	0.00	0.00	0.00	0.00

3.10. Architectural Coating (2026) - Mitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.15	0.12	0.86	1.13	< 0.005	0.02	—	0.02	0.02	—	0.02	—	134	134	0.01	< 0.005	—	134
Architectural Coatings	10.1	10.1	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.02	0.03	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	3.66	3.66	< 0.005	< 0.005	—	3.67
Architectural Coatings	0.28	0.28	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	< 0.005	< 0.005	< 0.005	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.61	0.61	< 0.005	< 0.005	—	0.61
Architectural Coatings	0.05	0.05	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.04	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	6.75	6.75	< 0.005	< 0.005	< 0.005	6.85
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.19	0.19	< 0.005	< 0.005	< 0.005	0.19
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.03	0.03	< 0.005	< 0.005	< 0.005	0.03
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	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

Mobile source emissions results are presented in Sections 2.6. No further detailed breakdown of emissions is available.

4.1.2. Mitigated

Mobile source emissions results are presented in Sections 2.5. No further detailed breakdown of emissions is available.

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	—	262	262	0.04	0.01	—	265
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	14.7	14.7	< 0.005	< 0.005	—	14.9
Total	—	—	—	—	—	—	—	—	—	—	—	—	277	277	0.04	0.01	—	280
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	—	262	262	0.04	0.01	—	265
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	14.7	14.7	< 0.005	< 0.005	—	14.9
Total	—	—	—	—	—	—	—	—	—	—	—	—	277	277	0.04	0.01	—	280
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	—	—	43.4	43.4	0.01	< 0.005	—	43.8
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	—	2.44	2.44	< 0.005	< 0.005	—	2.46
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	45.8	45.8	0.01	< 0.005	—	46.3

4.2.2. Electricity Emissions By Land Use - Mitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e	
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	—	262	262	0.04	0.01	—	265	
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	14.7	14.7	< 0.005	< 0.005	—	14.9	
Total	—	—	—	—	—	—	—	—	—	—	—	—	277	277	0.04	0.01	—	280	
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	—	262	262	0.04	0.01	—	265	
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	14.7	14.7	< 0.005	< 0.005	—	14.9	
Total	—	—	—	—	—	—	—	—	—	—	—	—	277	277	0.04	0.01	—	280	
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	—	43.4	43.4	0.01	< 0.005	—	43.8	

Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	2.44	2.44	< 0.005	< 0.005	—	2.46
Total	—	—	—	—	—	—	—	—	—	—	—	—	45.8	45.8	0.01	< 0.005	—	46.3

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	0.02	0.01	0.21	0.18	< 0.005	0.02	—	0.02	0.02	—	0.02	—	256	256	0.02	< 0.005	—	257
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.02	0.01	0.21	0.18	< 0.005	0.02	—	0.02	0.02	—	0.02	—	256	256	0.02	< 0.005	—	257
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	0.02	0.01	0.21	0.18	< 0.005	0.02	—	0.02	0.02	—	0.02	—	256	256	0.02	< 0.005	—	257
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.02	0.01	0.21	0.18	< 0.005	0.02	—	0.02	0.02	—	0.02	—	256	256	0.02	< 0.005	—	257
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	< 0.005	< 0.005	0.04	0.03	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	42.4	42.4	< 0.005	< 0.005	—	42.5
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	< 0.005	< 0.005	0.04	0.03	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	42.4	42.4	< 0.005	< 0.005	—	42.5

4.2.4. Natural Gas Emissions By Land Use - Mitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	0.02	0.01	0.21	0.18	< 0.005	0.02	—	0.02	0.02	—	0.02	—	256	256	0.02	< 0.005	—	257
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.02	0.01	0.21	0.18	< 0.005	0.02	—	0.02	0.02	—	0.02	—	256	256	0.02	< 0.005	—	257
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	0.02	0.01	0.21	0.18	< 0.005	0.02	—	0.02	0.02	—	0.02	—	256	256	0.02	< 0.005	—	257
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.02	0.01	0.21	0.18	< 0.005	0.02	—	0.02	0.02	—	0.02	—	256	256	0.02	< 0.005	—	257
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	< 0.005	< 0.005	0.04	0.03	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	42.4	42.4	< 0.005	< 0.005	—	42.5
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	< 0.005	< 0.005	0.04	0.03	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	42.4	42.4	< 0.005	< 0.005	—	42.5

4.3. Area Emissions by Source

4.3.1. Unmitigated

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

Source	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.43	0.43	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.03	0.03	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.15	0.14	0.01	0.87	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	3.58	3.58	< 0.005	< 0.005	—	3.59
Total	0.61	0.60	0.01	0.87	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	3.58	3.58	< 0.005	< 0.005	—	3.59
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.43	0.43	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.03	0.03	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	0.46	0.46	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.08	0.08	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Architectural Coating	0.01	0.01	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.01	0.01	< 0.005	0.08	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.29	0.29	< 0.005	< 0.005	—	0.29
Total	0.10	0.10	< 0.005	0.08	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.29	0.29	< 0.005	< 0.005	—	0.29

4.3.2. Mitigated

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

Source	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.43	0.43	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.03	0.03	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.15	0.14	0.01	0.87	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	3.58	3.58	< 0.005	< 0.005	—	3.59
Total	0.61	0.60	0.01	0.87	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	3.58	3.58	< 0.005	< 0.005	—	3.59
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.43	0.43	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Architectural	0.03	0.03	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	0.46	0.46	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.08	0.08	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.01	0.01	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.01	0.01	< 0.005	0.08	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.29	0.29	< 0.005	< 0.005	—	0.29
Total	0.10	0.10	< 0.005	0.08	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.29	0.29	< 0.005	< 0.005	—	0.29

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	4.81	5.52	10.3	0.49	0.01	—	26.2
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	4.81	5.52	10.3	0.49	0.01	—	26.2

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	4.81	5.52	10.3	0.49	0.01	—	26.2
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	4.81	5.52	10.3	0.49	0.01	—	26.2
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	0.80	0.91	1.71	0.08	< 0.005	—	4.34
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	0.80	0.91	1.71	0.08	< 0.005	—	4.34

4.4.2. Mitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	4.81	5.52	10.3	0.49	0.01	—	26.2
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	4.81	5.52	10.3	0.49	0.01	—	26.2
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	4.81	5.52	10.3	0.49	0.01	—	26.2
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	4.81	5.52	10.3	0.49	0.01	—	26.2
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	0.80	0.91	1.71	0.08	< 0.005	—	4.34
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	0.80	0.91	1.71	0.08	< 0.005	—	4.34

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	116	0.00	116	11.6	0.00	—	407
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	116	0.00	116	11.6	0.00	—	407
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	116	0.00	116	11.6	0.00	—	407
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	116	0.00	116	11.6	0.00	—	407
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	19.3	0.00	19.3	1.93	0.00	—	67.4
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	19.3	0.00	19.3	1.93	0.00	—	67.4

4.5.2. Mitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	116	0.00	116	11.6	0.00	—	407
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	116	0.00	116	11.6	0.00	—	407
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	116	0.00	116	11.6	0.00	—	407

Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	116	0.00	116	11.6	0.00	—	407
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	19.3	0.00	19.3	1.93	0.00	—	67.4
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	19.3	0.00	19.3	1.93	0.00	—	67.4

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e	
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.51	0.51	0.51
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.51	0.51	0.51
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.51	0.51	0.51
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.51	0.51	0.51
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.08	0.08
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.08	0.08

4.6.2. Mitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e	
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.51	0.51
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.51	0.51
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.51	0.51
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.51	0.51
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.08	0.08
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.08	0.08

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

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

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

4.7.2. Mitigated

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

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

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

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

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

4.8.2. Mitigated

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

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

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

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

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

4.9.2. Mitigated

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

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

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

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

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

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

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

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

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

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

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

Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.4. Soil Carbon Accumulation By Vegetation Type - Mitigated

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

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

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

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

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

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

4.10.6. Avoided and Sequestered Emissions by Species - Mitigated

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

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

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

5. Activity Data

5.1. Construction Schedule

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase	Phase Description
Site Preparation	Site Preparation	1/30/2026	2/1/2026	5.00	2.00	—
Grading	Grading	2/2/2026	2/7/2026	5.00	4.00	—
Building Construction	Building Construction	2/8/2026	11/15/2026	5.00	200	—
Paving	Paving	11/16/2026	11/30/2026	5.00	10.0	—
Architectural Coating	Architectural Coating	12/1/2026	12/15/2026	5.00	10.0	—

5.2. Off-Road Equipment

5.2.1. Unmitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Site Preparation	Graders	Diesel	Average	1.00	8.00	148	0.41

Site Preparation	Tractors/Loaders/Back	Diesel	Average	1.00	8.00	84.0	0.37
Site Preparation	Rubber Tired Dozers	Diesel	Average	1.00	7.00	367	0.40
Grading	Graders	Diesel	Average	1.00	8.00	148	0.41
Grading	Rubber Tired Dozers	Diesel	Average	1.00	8.00	367	0.40
Grading	Tractors/Loaders/Back hoes	Diesel	Average	2.00	7.00	84.0	0.37
Building Construction	Cranes	Diesel	Average	1.00	6.00	367	0.29
Building Construction	Forklifts	Diesel	Average	1.00	6.00	82.0	0.20
Building Construction	Tractors/Loaders/Back hoes	Diesel	Average	1.00	6.00	84.0	0.37
Building Construction	Generator Sets	Diesel	Average	1.00	8.00	14.0	0.74
Building Construction	Welders	Diesel	Average	3.00	8.00	46.0	0.45
Paving	Cement and Mortar Mixers	Diesel	Average	1.00	6.00	10.0	0.56
Paving	Pavers	Diesel	Average	1.00	6.00	81.0	0.42
Paving	Rollers	Diesel	Average	1.00	7.00	36.0	0.38
Paving	Tractors/Loaders/Back hoes	Diesel	Average	1.00	8.00	84.0	0.37
Paving	Paving Equipment	Diesel	Average	1.00	8.00	89.0	0.36
Architectural Coating	Air Compressors	Diesel	Average	1.00	6.00	37.0	0.48

5.2.2. Mitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Site Preparation	Graders	Diesel	Average	1.00	8.00	148	0.41
Site Preparation	Tractors/Loaders/Back hoes	Diesel	Average	1.00	8.00	84.0	0.37
Site Preparation	Rubber Tired Dozers	Diesel	Average	1.00	7.00	367	0.40
Grading	Graders	Diesel	Average	1.00	8.00	148	0.41
Grading	Rubber Tired Dozers	Diesel	Average	1.00	8.00	367	0.40

Grading	Tractors/Loaders/Back hoes	Diesel	Average	2.00	7.00	84.0	0.37
Building Construction	Cranes	Diesel	Average	1.00	6.00	367	0.29
Building Construction	Forklifts	Diesel	Average	1.00	6.00	82.0	0.20
Building Construction	Tractors/Loaders/Back hoes	Diesel	Average	1.00	6.00	84.0	0.37
Building Construction	Generator Sets	Diesel	Average	1.00	8.00	14.0	0.74
Building Construction	Welders	Diesel	Average	3.00	8.00	46.0	0.45
Paving	Cement and Mortar Mixers	Diesel	Average	1.00	6.00	10.0	0.56
Paving	Pavers	Diesel	Average	1.00	6.00	81.0	0.42
Paving	Rollers	Diesel	Average	1.00	7.00	36.0	0.38
Paving	Tractors/Loaders/Back hoes	Diesel	Average	1.00	8.00	84.0	0.37
Paving	Paving Equipment	Diesel	Average	1.00	8.00	89.0	0.36
Architectural Coating	Air Compressors	Diesel	Average	1.00	6.00	37.0	0.48

5.3. Construction Vehicles

5.3.1. Unmitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Site Preparation	—	—	—	—
Site Preparation	Worker	7.50	7.70	LDA,LDT1,LDT2
Site Preparation	Vendor	—	4.00	HHDT,MHDT
Site Preparation	Hauling	0.00	20.0	HHDT
Site Preparation	Onsite truck	—	—	HHDT
Grading	—	—	—	—
Grading	Worker	10.0	7.70	LDA,LDT1,LDT2
Grading	Vendor	—	4.00	HHDT,MHDT
Grading	Hauling	0.00	20.0	HHDT

Grading	Onsite truck	—	—	HHDT
Building Construction	—	—	—	—
Building Construction	Worker	6.40	7.70	LDA,LDT1,LDT2
Building Construction	Vendor	3.28	4.00	HHDT,MHDT
Building Construction	Hauling	0.00	20.0	HHDT
Building Construction	Onsite truck	—	—	HHDT
Paving	—	—	—	—
Paving	Worker	12.5	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	1.28	7.70	LDA,LDT1,LDT2
Architectural Coating	Vendor	—	4.00	HHDT,MHDT
Architectural Coating	Hauling	0.00	20.0	HHDT
Architectural Coating	Onsite truck	—	—	HHDT

5.3.2. Mitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Site Preparation	—	—	—	—
Site Preparation	Worker	7.50	7.70	LDA,LDT1,LDT2
Site Preparation	Vendor	—	4.00	HHDT,MHDT
Site Preparation	Hauling	0.00	20.0	HHDT
Site Preparation	Onsite truck	—	—	HHDT
Grading	—	—	—	—
Grading	Worker	10.0	7.70	LDA,LDT1,LDT2
Grading	Vendor	—	4.00	HHDT,MHDT
Grading	Hauling	0.00	20.0	HHDT

Grading	Onsite truck	—	—	HHDT
Building Construction	—	—	—	—
Building Construction	Worker	6.40	7.70	LDA,LDT1,LDT2
Building Construction	Vendor	3.28	4.00	HHDT,MHDT
Building Construction	Hauling	0.00	20.0	HHDT
Building Construction	Onsite truck	—	—	HHDT
Paving	—	—	—	—
Paving	Worker	12.5	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	1.28	7.70	LDA,LDT1,LDT2
Architectural Coating	Vendor	—	4.00	HHDT,MHDT
Architectural Coating	Hauling	0.00	20.0	HHDT
Architectural Coating	Onsite truck	—	—	HHDT

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

Non-applicable. No control strategies activated by user.

5.5. Architectural Coatings

Phase Name	Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
Architectural Coating	0.00	0.00	30,000	10,000	1,803

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (Ton of Debris)	Material Exported (Ton of Debris)	Acres Graded (acres)	Material Demolished (sq. ft.)	Acres Paved (acres)
Site Preparation	0.00	0.00	1.88	0.00	—
Grading	0.00	0.00	4.00	0.00	—
Paving	0.00	0.00	0.00	0.00	0.69

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
Medical Office Building	0.00	0%
Parking Lot	0.69	100%

5.8. Construction Electricity Consumption and Emissions Factors

kWh per Year and Emission Factor (lb/MWh)

Year	kWh per Year	CO2	CH4	N2O
2026	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
Total all Land Uses	203	203	203	74,095	1,126	1,126	1,126	411,123

5.9.2. Mitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VM/Weekday	VM/Saturday	VM/Sunday	VM/Year
Total all Land Uses	203	203	203	74,095	1,126	1,126	1,126	411,123

5.10. Operational Area Sources

5.10.1. Hearths

5.10.1.1. Unmitigated

5.10.1.2. Mitigated

5.10.2. Architectural Coatings

Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
0	0.00	30,000	10,000	1,803

5.10.3. Landscape Equipment

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

5.10.4. Landscape Equipment - Mitigated

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

5.11. Operational Energy Consumption

5.11.1. Unmitigated

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

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Medical Office Building	468,928	204	0.0330	0.0040	798,782
Parking Lot	26,329	204	0.0330	0.0040	0.00

5.11.2. Mitigated

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

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Medical Office Building	468,928	204	0.0330	0.0040	798,782
Parking Lot	26,329	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)
Medical Office Building	2,509,611	0.00
Parking Lot	0.00	0.00

5.12.2. Mitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Medical Office Building	2,509,611	0.00
Parking Lot	0.00	0.00

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Medical Office Building	216	—

Parking Lot	0.00	—
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5.13.2. Mitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Medical Office Building	216	—
Parking Lot	0.00	—

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
Medical Office Building	Household refrigerators and/or freezers	R-134a	1,430	0.45	0.60	0.00	1.00
Medical Office Building	Other commercial A/C and heat pumps	R-410A	2,088	< 0.005	4.00	4.00	18.0

5.14.2. Mitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
Medical Office Building	Household refrigerators and/or freezers	R-134a	1,430	0.45	0.60	0.00	1.00
Medical Office Building	Other commercial A/C and heat pumps	R-410A	2,088	< 0.005	4.00	4.00	18.0

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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5.15.2. Mitigated

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
----------------	-----------

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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5.18.1.2. Mitigated

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

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres
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5.18.1.2. Mitigated

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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5.18.2.2. Mitigated

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

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

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

Climate Hazard	Result for Project Location	Unit
Temperature and Extreme Heat	27.2	annual days of extreme heat
Extreme Precipitation	2.10	annual days with precipitation above 20 mm
Sea Level Rise	—	meters of inundation depth
Wildfire	0.00	annual hectares burned

Temperature and Extreme Heat data are for grid cell in which your project are located. The projection is based on the 98th historical percentile of daily maximum/minimum temperatures from observed historical data (32 climate model ensemble from Cal-Adapt, 2040–2059 average under RCP 8.5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi. Extreme Precipitation data are for the grid cell in which your project are located. The threshold of 20 mm is equivalent to about ¾ an inch of rain, which would be light to moderate rainfall if received over a full day or heavy rain if received over a period of 2 to 4 hours. Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

Sea Level Rise data are for the grid cell in which your project are located. The projections are from Radke et al. (2017), as reported in Cal-Adapt (Radke et al., 2017, CEC-500-2017-008), and consider inundation location and depth for the San Francisco Bay, the Sacramento-San Joaquin River Delta and California coast resulting different increments of sea level rise coupled with extreme storm events. Users may select from four scenarios to view the range in potential inundation depth for the grid cell. The four scenarios are: No rise, 0.5 meter, 1.0 meter, 1.41 meters

Wildfire data are for the grid cell in which your project are located. The projections are from UC Davis, as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider historical data of climate, vegetation, population density, and large (> 400 ha) fire history. Users may select from four model simulations to view the range in potential wildfire probabilities for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

6.2. Initial Climate Risk Scores

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

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.

The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.

The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores do not include implementation of climate risk reduction measures.

6.3. Adjusted Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	N/A	N/A	N/A	N/A
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	N/A	N/A	N/A	N/A
Wildfire	N/A	N/A	N/A	N/A
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A

Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	N/A	N/A	N/A	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.

The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.

The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores include implementation of climate risk reduction measures.

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

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

Indicator	Result for Project Census Tract
Exposure Indicators	—
AQ-Ozone	84.6
AQ-PM	97.2
AQ-DPM	58.1
Drinking Water	84.4
Lead Risk Housing	74.9
Pesticides	0.00
Toxic Releases	75.6
Traffic	70.2
Effect Indicators	—
CleanUp Sites	33.9
Groundwater	59.6
Haz Waste Facilities/Generators	45.7
Impaired Water Bodies	0.00
Solid Waste	0.00

Sensitive Population	—
Asthma	97.4
Cardio-vascular	72.4
Low Birth Weights	98.2
Socioeconomic Factor Indicators	—
Education	88.8
Housing	78.1
Linguistic	63.7
Poverty	88.3
Unemployment	81.0

7.2. Healthy Places Index Scores

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

Indicator	Result for Project Census Tract
Economic	—
Above Poverty	6.903631464
Employed	13.55062235
Median HI	3.361991531
Education	—
Bachelor's or higher	19.41485949
High school enrollment	13.78159887
Preschool enrollment	6.800975234
Transportation	—
Auto Access	8.725779546
Active commuting	46.84973694
Social	—
2-parent households	53.44539972
Voting	3.811112537

Neighborhood	—
Alcohol availability	23.14897985
Park access	2.194276915
Retail density	56.05030155
Supermarket access	65.54600282
Tree canopy	32.51636084
Housing	—
Homeownership	15.87321956
Housing habitability	9.944822276
Low-inc homeowner severe housing cost burden	9.867830104
Low-inc renter severe housing cost burden	64.09598358
Uncrowded housing	16.43782882
Health Outcomes	—
Insured adults	30.92518927
Arthritis	41.4
Asthma ER Admissions	4.2
High Blood Pressure	31.6
Cancer (excluding skin)	71.8
Asthma	16.4
Coronary Heart Disease	28.5
Chronic Obstructive Pulmonary Disease	16.6
Diagnosed Diabetes	25.3
Life Expectancy at Birth	9.8
Cognitively Disabled	3.1
Physically Disabled	7.8
Heart Attack ER Admissions	25.6
Mental Health Not Good	15.9
Chronic Kidney Disease	35.4

Obesity	29.7
Pedestrian Injuries	19.6
Physical Health Not Good	20.5
Stroke	22.5
Health Risk Behaviors	—
Binge Drinking	73.8
Current Smoker	23.0
No Leisure Time for Physical Activity	11.7
Climate Change Exposures	—
Wildfire Risk	0.0
SLR Inundation Area	0.0
Children	2.3
Elderly	80.0
English Speaking	38.3
Foreign-born	50.5
Outdoor Workers	30.3
Climate Change Adaptive Capacity	—
Impervious Surface Cover	30.2
Traffic Density	39.6
Traffic Access	0.0
Other Indices	—
Hardship	87.8
Other Decision Support	—
2016 Voting	2.3

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	95.0

Healthy Places Index Score for Project Location (b)	2.00
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	Yes
Project Located in a Low-Income Community (Assembly Bill 1550)	Yes
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	No

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

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

7.4. Health & Equity Measures

No Health & Equity Measures selected.

7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

7.6. Health & Equity Custom Measures

No Health & Equity Custom Measures created.

8. User Changes to Default Data

Screen	Justification
Construction: Construction Phases	No demolition

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MEMORANDUM

To: Guy Stockbridge, Manager, Stock Five Holdings, LLC

From: Olivia Arredondo, Biologist

Subject: Biological Evaluation of the Granite Park Program of All-Inclusive Care Facility Project

Date: July 30, 2025

PROJECT BACKGROUND AND LOCATION

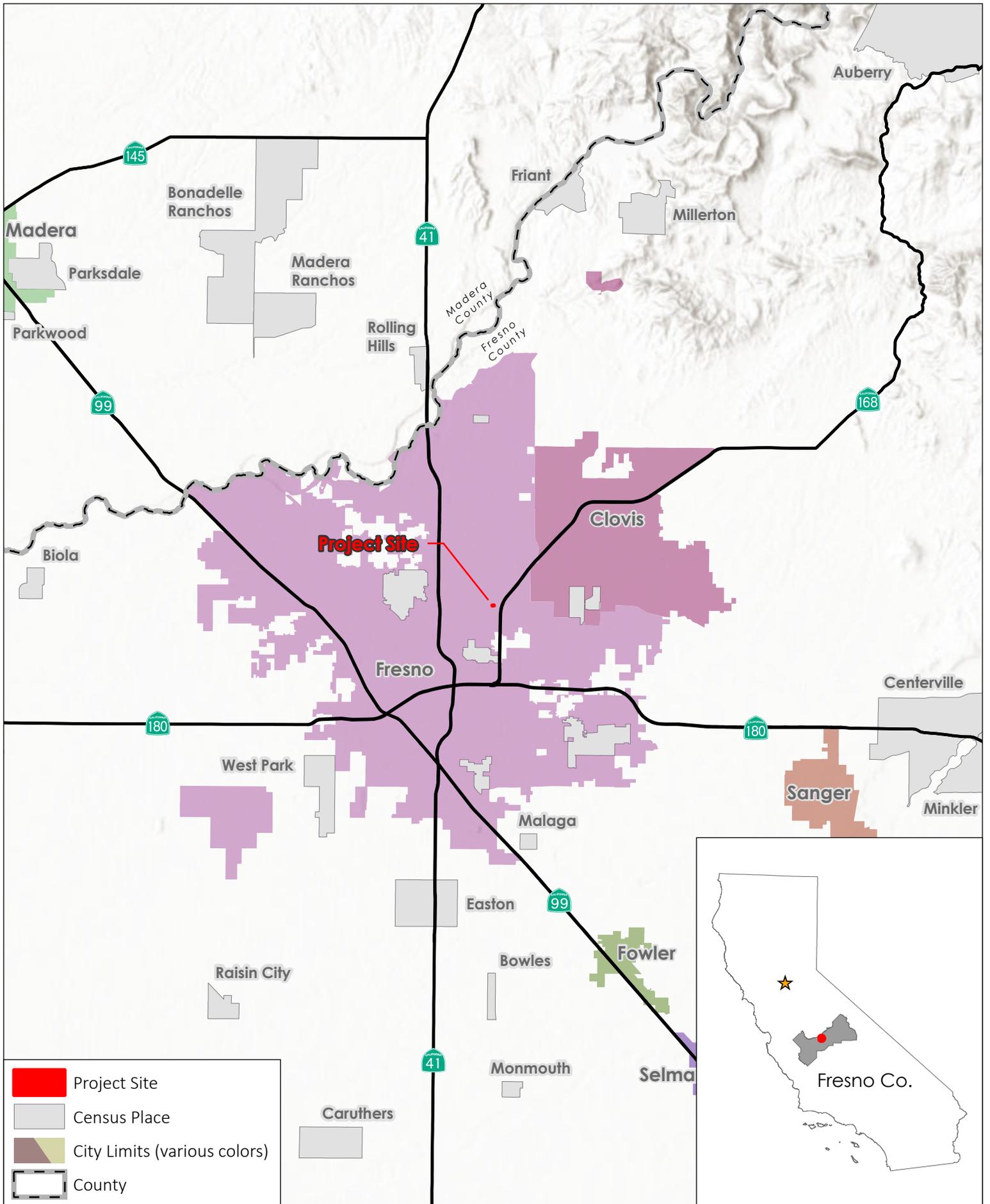
Stock Five Holdings, LLC seeks approval from the City of Fresno to construct a 20,000 square foot Granite Park Program of All-Inclusive Care (“PACE”) Facility (Project) on approximately 1.15 acres on Assessor’s Parcel No. 438-220-01, -09, and -10, located at the southeast corner of North Cedar Avenue and East Hampton Way within the City of Fresno (see [Figure 1](#) and [Figure 2](#)).

STUDY METHODOLOGY

Provost & Pritchard Consulting Group biologist, Olivia Arredondo, conducted a desktop analysis of potential Project-related effects to biological resources based on the resources known to occur, or with potential to occur, within the Project site. Sources of information used in preparation of this analysis include: the California Department of Fish and Wildlife’s (CDFW) California Natural Diversity Database (CNDDDB; see [Attachment A](#) for the species list) and California Native Plant Society’s (CNPS) Online Inventory of Rare and Endangered Vascular Plants of California; CalFlora’s online database of California native plants; Jepson Herbarium’s online database (i.e., Jepson eFlora); United States Fish and Wildlife Service’s (USFWS) Environmental Conservation Online System (ECOS), Information for Planning and Consultation (IPaC; see [Attachment B](#) for the species list) system, Essential Fish Habitat Mapper (EFHM; see [Attachment C](#)) and National Wetlands Inventory (NWI); iNaturalist; NatureServe Explorer’s online database; United States Department of Agriculture (USDA) Natural Resources Conservation Service’s (NRCS) Web Soil Survey, California Herps website; and various manuals, reports, and references related to plants and animals of the San Joaquin Valley region. No field survey was conducted. The assessment of habitats within the Project site was completed utilizing satellite and historical imagery. Recommendations were then developed to avoid any potential effects to protected resources that may occur on or near the Project site.

EXISTING CONDITIONS

As follows are details on the topography, climate, waters, soils, and biotic habitats of the site.



- Project Site
- Census Place
- City Limits (various colors)
- County



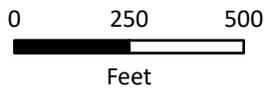
Regional Vicinity Map

Stock Five Holdings LLC - Granite Park PACE Facility

PROVOST & PRITCHARD



Esri, Maxar, Earthstar Geographics, and the GIS User Community



Aerial Map

Stock Five Holdings LLC - Granite Park PACE Facility

PROVOST & PRITCHARD

TOPOGRAPHY

Within the United States Geological Survey *Fresno North* 7.5-minute quadrangle, the site is located in the northwest corner of Section 24, Township 13 South, Range 20 East (See [Figure 3](#)). The topography within the site is relatively flat, with an elevation of approximately 325 feet above mean sea level throughout the site.

CLIMATE

Like most of California, the Project site experiences a Mediterranean climate. Warm, dry summers are followed by cool, moist winters. In the summer, average high temperatures range between 100- and 105-degrees Fahrenheit (°F), but do not often exceed 110 °F, and the humidity is generally low. Winter temperatures are often below 60 °F during the day and rarely exceed 70 °F. On average, the City of Fresno receives approximately 10 inches of precipitation in the form of rain yearly, most of which occurs between December and April, and the Project site would be expected to receive similar amounts of precipitation (The National Oceanic and Atmospheric Administration, 2025).

WATERS

There are no surface water features near the site. All ditches and canals in this area are underground and the nearest feature, Gould Canal, is approximately 0.1 mile north of the site. This ditch would not be impacted by the Project.

SOILS

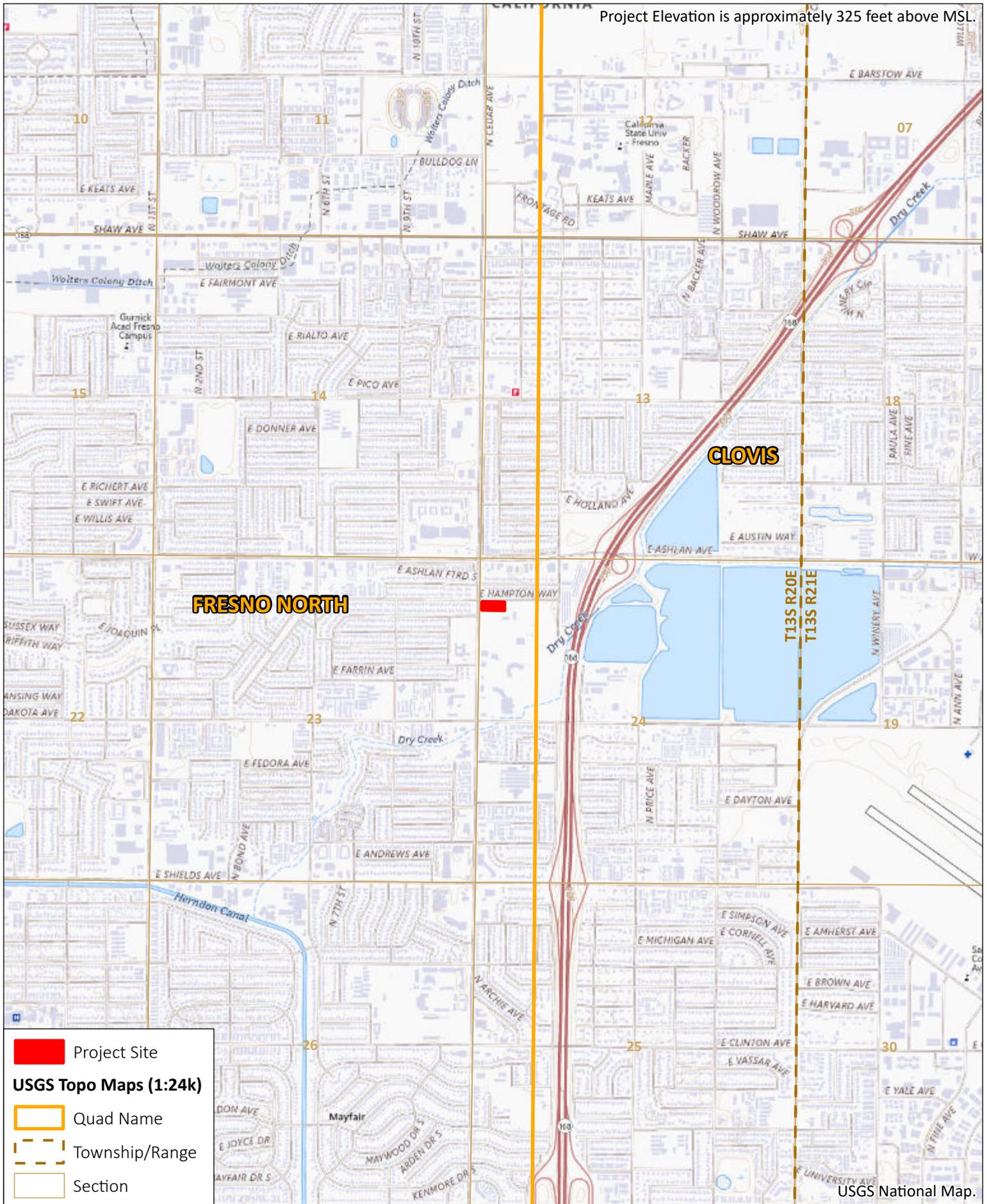
One soil mapping unit representing a soil type was identified within the site and is listed in [Table 1](#) (see [Attachment D](#) for the Web Soil Survey Report). The soils are displayed with their core properties in the table below, according to the Major Land Resource Area of California. This soil is used for grazing, agriculture, and development.

Table 1: List of Soils Located on the Project Site and Their Basic Properties

Soil	Soil Map Unit	Percent of Site	Hydric Soil Category	Drainage	Permeability	Runoff
<i>Tujunga</i>	Loamy sand, 0 to 3 percent slopes	100%	Predominantly Nonhydric	Somewhat excessively drained	High to very high	Very low

Hydric soils are defined as soils that are saturated, flooded, or ponded long enough during the growing season to develop anaerobic conditions such that under sufficiently wet conditions, hydrophytic vegetation can be supported. Hydric soil ratings are derived from specific soil properties as well as climate, parent material, vegetation, landform type, and biological activity of a certain location. None of the major soil mapping units located on the Project sites were identified as hydric.

Project Elevation is approximately 325 feet above MSL.



- Project Site
- USGS Topo Maps (1:24k)**
- Quad Name
- Township/Range
- Section



Topographic Map

Stock Five Holdings LLC - Granite Park PACE Facility

PROVOST & PRITCHARD

BIOTIC HABITAT

The Project site consists of only ruderal habitat with paved roads and a well-maintained lawn, which would provide little resources for wildlife. Because the area is highly urbanized and developed with constant disturbance from traffic, nearby businesses, and adjacent residential areas, common urban wildlife species are expected to occupy the Project site. The lawn itself and the widely-spaced trees could provide foraging and nesting opportunity for a variety of birds, such as California scrub jay (*Aphelocoma californica*), European starling (*Sturnus vulgaris*), house finch (*Haemorhous mexicanus*), house sparrow (*Passer domesticus*), killdeer (*Charadrius vociferus*), mourning dove (*Zenaida macroura*), and northern mockingbird (*Mimus polyglottos*). The lawn can function as foraging habitat for mammal species such as California ground squirrel (*Otospermophilus beecheyi*), eastern fox squirrel (*Sciurus niger*), and Virginia opossum (*Didelphis virginiana*). Because of the constant lawn maintenance, it is unlikely to be a suitable burrowing habitat. Domesticated species such as dogs (*Canis lupus familiaris*) and cats (*Felis catus*), both stray and owned, likely travel through the Project site.

SENSITIVE RESOURCES

As follows are details on the special status species, migratory birds, designated habitat and communities, and wildlife movement corridors, and native wildlife nursery sites that could be affected by Project-related activities.

SPECIAL STATUS SPECIES

A query of the CNDDDB for occurrences of special status plant and animal species was conducted for the *North Fresno* and *Clovis* USGS 7.5-Minute quadrangle. A query of the IPaC was also completed for the site. Species within two miles of the Project site were evaluated for their potential to occur within the Project site. These species, and their potential to occur within the Project site, are listed in [Table 2](#) and [Table 3](#), below. Other special status species that did not show up in the CNDDDB query, but have the potential to occur in the vicinity, are also included in [Table 3](#).

Table 2: List of Special Status Plants with Potential to Occur Onsite and/or in the Vicinity

Species	Status*	Habitat	Occurrence within the Site
California jewelflower (<i>Caulanthus californicus</i>)	FE, CE, CNPS 1B	Found in the San Joaquin Valley and western Transverse Ranges in sandy soils. Occurs on flats and slopes, generally in non-alkaline grassland at elevations between 200 and 6,100 feet. Blooms February – April.	Absent. CNDDDB lists this species as “extirpated” from the region.
California satintail (<i>Imperata brevifolia</i>)	CNPS 2B	Often found in wet springs, meadows, streambanks, and floodplains, and can also be found in coastal scrub, riparian scrub, Mojavean desert scrub, chaparral, and alkali seeps at elevations below 1,600 feet. Blooms September – May.	Absent. The Project site does not provide suitable aquatic habitat to support this species.
Madera leptosiphon (<i>Leptosiphon serrulatus</i>)	CNPS 1B	Found within openings of foothill woodland, often yellow-pine forest, and chaparral at elevations between 1,000 and 4,300 feet. Blooms April – May.	Absent. The Project site does not provide suitable habitat and is outside the elevational range of this species.

Species	Status*	Habitat	Occurrence within the Site
San Joaquin Valley Orcutt grass (<i>Orcuttia inaequalis</i>)	FT, CE, CNPS 1B	Found in the eastern San Joaquin Valley and the Sierra Nevada foothills in vernal pools within valley grassland, freshwater wetland, and wetland-riparian communities at elevations below 2,600 feet. Blooms April – September.	Absent. The Project site does not provide suitable vernal pool habitat to support this species.
Sanford’s arrowhead (<i>Sagittaria sanfordii</i>)	CNPS 1B	This species is an aquatic plant and is found in the San Joaquin Valley and other parts of California in freshwater marshes, ponds, canals, and ditches at elevations below 1,000 feet. Blooms May – October.	Absent. The Project site does not provide suitable aquatic habitat to support this species.
Succulent owl’s-clover (<i>Castilleja campestris</i> var. <i>succulenta</i>)	FT, CE, CNPS 1B	Occurs usually in wetlands and vernal pools but occasionally in non-wetlands. Often found in acidic soils at elevations below 2,500 feet. Blooms April – July.	Absent. The Project site does not provide suitable vernal pool habitat to support this species.

Table 3: List of Special Status Animals with Potential to Occur Onsite and/or in the Vicinity

Species	Status*	Habitat	Occurrence within the Site
Burrowing owl (<i>Athene cunicularia</i>)	CC, CSSC	Resides in open, dry grasslands, deserts, scrublands, and other areas with low growing vegetation. Nests and roosts underground in existing burrows created by mammals, most often by ground squirrels, and human-made structures.	Possible. The lawn of the Project site could provide foraging habitat for this species. The nearest recorded observation of this species within the vicinity was approximately 1.4 miles southeast of the Project site at the Fresno Yosemite International Airport in 1990.
California condor (<i>Gymnogyps californianus</i>)	FE, CE, CFP	Typically nests in cavities in canyon or cliff faces but has also been recorded nesting in giant sequoias in Tulare County. Requires vast expanses of open savannah, grassland, and/or foothill chaparral in mountain ranges of moderate altitude. Forages for carrion up to 100 miles from their roost/nest sites.	Unlikely. While the lawn of the Project site could provide foraging habitat for this species, no suitable nesting habitat was present. There are no recorded observations of this species on CNDDDB within the regional vicinity of the project.
California glossy snake (<i>Arizona elegans occidentalis</i>)	CSSC	Inhabits arid scrub, rocky washes, grasslands, and chaparral. Prefers open areas with loose soil for easy burrowing. This species occurs near the Pacific Coast ranges from the eastern part of the San Francisco Bay Area south to northwestern Baja California but is absent along the central coast.	Unlikely. While the lawn within the Project site offers grassland habitat for this species, this area is highly disturbed with routine landscaping and lawn maintenance. The nearest recorded observation overlaps the Project site in a large, non-specific area recorded in 1893.
California tiger salamander – central California DPS (<i>Ambystoma californiense</i>)	FT, CT	Requires vernal pools or seasonal ponds for breeding and small mammal burrows for aestivation. Generally found in grassland and oak savannah plant communities in central California from sea level to	Absent. The Project site does not provide suitable aquatic habitat to support this species.

Species	Status*	Habitat	Occurrence within the Site
		1,500 feet in elevation. Can migrate up to 1.3 miles to breed.	
Coast horned lizard <i>(Phrynosoma blainvillii)</i>	CSSC	Found in grasslands, coniferous forests, woodlands, and chaparral, primarily in open areas with patches of loose, sandy soil and low-lying vegetation in valleys, foothills, and semi-arid mountains. Frequently found near ant hills and along dirt roads in lowlands along sandy washes with scattered shrubs.	Unlikely. While the lawn within the Project site acts as grassland habitat, this species is listed as “possibly extirpated” from the region according to CNDDDB. The nearest recorded observation overlaps the Project site in a large, non-specific area recorded in 1893.
Fresno kangaroo rat <i>(Dipodomys nitratoides exilis)</i>	FE, CE	An inhabitant of alkali sinks and open grassland habitats in Merced, Kings, Fresno, and Madera counties. Prefers bare, alkaline, clay-based soils subject to seasonal inundation with more friable soil mounds around shrubs and grasses. The most recent recorded observation of this species in California was in 1992 in Fresno County.	Absent. Alkaline sinks and clay soil are absent from the Project site.
Monarch butterfly <i>(Danaus plexippus)</i>	FPT	Roosts in wind-protected tree groves (eucalyptus, Monterey pine, cypress), with nectar and water sources nearby. Larval host plants consist of milkweeds. Winter roost sites extend along the Pacific Coast from northern Mendocino to Baja California, Mexico.	Unlikely. This species could travel through the Project site during breeding season, but roosting habitat is absent and the area is highly disturbed by routine landscaping/ lawn maintenance. The nearest recorded observation of this species within the vicinity was approximately 3.3 miles southwest of the Project site in 2016.
Northern California legless lizard <i>(Anniella pulchra)</i>	CSSC	Found primarily underground, burrowing in loose, moist, and sandy soil. Forages in loose soil and leaf litter during the day. Occasionally observed on the surface at dusk and night.	Absent. The Project site is located outside of the current known range of this species.
Northwestern pond turtle <i>(Actinemys marmorata)</i>	FPT, CSSC	An aquatic turtle of ponds, marshes, slow-moving rivers, streams, and irrigation ditches with riparian vegetation. Requires adequate basking sites and sandy banks or grassy open fields to deposit eggs.	Absent. The Project site does not provide suitable aquatic habitat to support this species.
San Joaquin kit fox <i>(Vulpes macrotis mutica)</i>	FE, CT	Opportunistically forages in a variety of habitats. Dens in burrows within alkali sink, valley grassland, and woodland habitats in valleys and adjacent foothills and in human-made structures in cities, rangeland, and agricultural areas. Occurs in the San Joaquin Valley and other smaller valleys to the west.	Unlikely. While the lawn within the Project site offers potential foraging habitat, the routine landscaping and lawn maintenance would prevent this species from denning. The Project site is located approximately 24 miles east of the Western Madera County satellite population with no corridor to allow for ease of travel. The nearest recorded observation was documented on iNaturalist and over 50 miles southwest of the Project site in 2025.

Species	Status*	Habitat	Occurrence within the Site
Swainson's hawk <i>(Buteo swainsoni)</i>	CT	Nests in large trees in open areas adjacent to grasslands, grain or alfalfa fields, or livestock pastures suitable for supporting rodent populations.	Unlikely. While the lawn of the Project site could provide foraging habitat for this species, the trees within the site are not large enough to contain a nest of this species. The nearest recorded observation overlaps the Project site in a large, non-specific area recorded in 1956.
Tricolored blackbird <i>(Agelaius tricolor)</i>	CT, CSSC	Nests colonially near fresh water in dense cattails or tules, or in thickets of riparian shrubs. Forages in grassland and cropland. Large colonies are often found foraging in dairy farm feed fields.	Unlikely. Suitable nesting habitat for this species was absent from the Project site, but the lawn could be utilized for foraging. The nearest recorded observation of this species within the vicinity was approximately 0.9 miles northeast of the Project site in 1975.
Vernal pool fairy shrimp <i>(Branchinecta lynchi)</i>	FT	Occupies vernal and seasonal pools, with clear to tea-colored water, in grass or mud-bottomed swales, and basalt depression pools.	Absent. Suitable vernal pool habitat required by this species was absent from the Project area.
Western spadefoot <i>(Spea hammondi)</i>	FPT, CSSC	The majority of the time this species is terrestrial and occurs in small mammal burrows and soil cracks, sometimes in the bottom of dried pools. Prefers open areas with sandy or gravelly soils, in a variety of habitats including mixed woodlands, grasslands, coastal sage scrub, chaparral, sandy washes, lowlands, river floodplains, alluvial fans, playas, alkali flats, foothills, and mountains. Vernal or seasonal pools, that hold water for a minimum of three weeks, are necessary for breeding.	Absent. The Project site does not provide suitable aquatic habitat to support this species.

***EXPLANATION OF OCCURRENCE DESIGNATIONS AND STATUS CODES**

- Present: Species observed on the Project site at time of field surveys or during recent past.
- Likely: Species not observed on the Project site, but it may reasonably be expected to occur there on a regular basis.
- Possible: Species not observed on the Project site, but it could occur there from time to time.
- Unlikely: Species not observed on the Project site, and would not be expected to occur there except, perhaps, as a transient.
- Absent: Species not observed on the Project site and precluded from occurring there due to absence of suitable habitat.

STATUS CODES

- | | | | |
|-----|---------------------------------|------|---------------------------------------|
| FE | Federally Endangered | CE | California Endangered |
| FT | Federally Threatened | CT | California Threatened |
| FPT | Federally Threatened (Proposed) | CFP | California Fully Protected |
| | | CSSC | California Species of Special Concern |

CNPS LISTING

- | | | | |
|----|---|----|--|
| 1B | Plants rare, threatened, or endangered in California and elsewhere. | 2B | Plants rare, threatened, or endangered in California, but more common elsewhere. |
|----|---|----|--|

MIGRATORY BIRDS

Migratory birds are protected by the Migratory Bird Treaty Act and California Fish and Game code. There are numerous regulations with each law, but generally, most negative impacts to a migratory bird are illegal. Birds are more vulnerable during the nesting season, and they can nest on the ground, and in shrubs, trees, and other natural and unnatural structures. At the site, birds could nest on the ground such as killdeer (*Charadrius vociferus*) or on the existing trees such as passerines (*Passeriformes*) and could be impacted by Project activities.

DESIGNATED HABITATS AND COMMUNITIES

The USFWS often designates areas of “Critical Habitat” when it lists species as threatened or endangered. Critical Habitat is a specific geographic area that contains features essential for the conservation of a threatened or endangered species and would require special management or protection. According to CNDDDB and IPaC, designated critical habitat is absent from the site and vicinity.

The CDFW also designates “natural communities of special concern” and has jurisdiction over most riparian habitat. Natural communities of special concern are defined by distinguished, significant biological diversity, or a home to special status species. Riparian habitat is composed of plant communities that occur along the banks, and sometimes over the banks, of most waterways and is an important habitat for numerous wildlife species. According to CNDDDB and historical aerial imagery, the site does not appear to contain any natural communities of special concern or riparian habitat.

RECOMMENDATIONS

Of the 20 special status species, burrowing owl (BUOW) is expected to occur within/ adjacent to the site. The habitat within the area is disturbed by development, urbanization, and routine landscaping/ lawn maintenance and would therefore be considered less than marginal habitat for most special-status species. Implementation of the Project should have no impact on the 19 special status species determined unlikely through construction mortality, disturbance, or loss of habitat. However, trees within and adjacent to the site can be utilized by migratory nesting birds and BUOW can utilize the site for foraging. To comply with state and federal laws protecting special status species, the following recommendations have been provided to reduce potential Project-related effects to biological resources within and around the Project site.

Recommendation 1(a) Nesting Bird Avoidance: The Project’s construction activities will occur, if feasible, between August 31 and January 31 (outside of the nesting bird season) to avoid impacts to nesting birds.

Recommendation 1(b) Migratory Nesting Bird Pre-Activity Survey: If activities must occur within the nesting bird season (February 1 to August 31), a qualified biologist will conduct a pre-construction survey for active migratory bird nests no more than seven (7) days prior to the start of the construction within the Project site and surrounding lands up to 50 feet from the Project site and for active raptor nests within the Project site and all accessible lands up to 450-feet from the Project site. All raptor nests would be considered “active” upon the nest-building stage.

Recommendation 1(c) Nesting Bird Avoidance Buffers: On discovery of any active nests or breeding colonies near work areas, a qualified biologist should determine appropriate avoidance buffer distances based on applicable CDFW and/or USFWS guidelines, the biology of the species, conditions of the nest(s), and the level of Project disturbance. If needed, avoidance buffers should be identified with flagging, fencing, or other easily visible means, and should be maintained until the biologist has determined that the nestlings have fledged.

Recommendation 2(a) BUOW Pre-Activity Survey: A qualified biologist (someone familiar with the identification and sign of this species) will conduct a pre-construction take avoidance survey for BUOW

and suitable burrows, in accordance with CDFW’s *Staff Report on Burrowing Owl Mitigation* (2012), within seven (7) days prior to the start of construction activities. The survey will include the proposed work area and surrounding lands up to 500 feet. If construction is delayed or halted for more than seven (7) days, another pre-construction survey for BUOW will be conducted. If no BUOW individuals or active burrows are observed, no further mitigation is required.

Recommendation 2(b) BUOW Avoidance Buffers: If an active BUOW burrow is detected, avoidance buffers will be implemented. A qualified biologist will determine appropriate avoidance buffer distances based on CDFW’s 2012 *Staff Report on Burrowing Owl Mitigation*, the biology of BUOW, conditions of the burrow(s), and the level of project disturbance. If necessary, avoidance buffers will be identified with flagging, fencing, or other easily visible means, and will be maintained until the biologist has determined that the nestlings have fledged and all BUOW have left the project area.

Level of Disturbance				
Location	Time of Year	Low	Med	High
Nesting sites	April 1-Aug 15	200 meters	500 meters	500 meters
Nesting sites	Aug 16-Oct 15	200 meters	200 meters	500 meters
Nesting sites	Oct 16-Mar 31	50 meters	100 meters	500 meters

Recommendation 2(c) BUOW ITP and Passive Relocation: If an active BUOW burrow is detected within the proposed work area and cannot be avoided, it is recommended the project obtain an Incidental Take Permit (ITP) in order to implement protection plans and/or relocation plans in consultation with CDFW and/or USFWS and protect the project from “take” of this species.

Implementation of **Recommendations 1a-1c and 2a-2c** would avoid potential effects to sensitive biological resources. If you have any questions or need further information, please do not hesitate to contact me at (559) 449-2700 or oarredondo@ppeng.com.

Sincerely,



Olivia Arredondo
Biologist

FIGURES:

- Figure 1: Regional Vicinity Map
- Figure 2: Aerial Map
- Figure 3: Topography Map

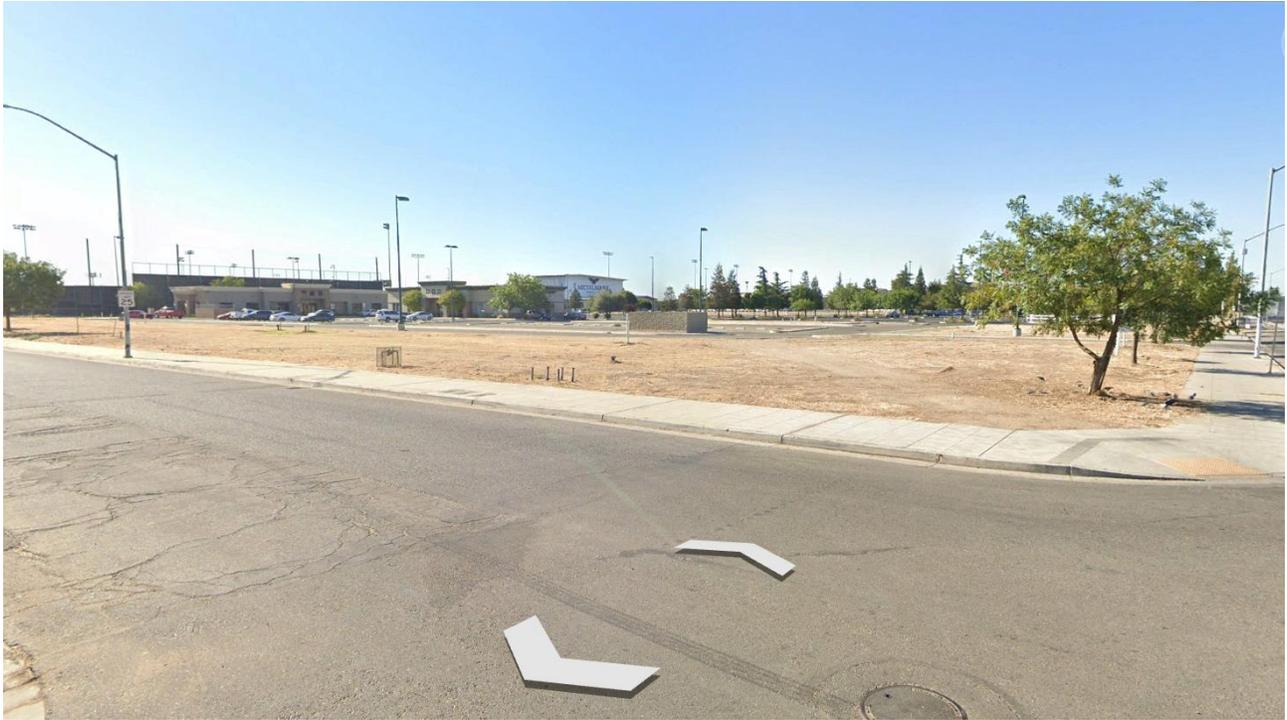
TABLES:

- Table 1: List of Soils Located on the Project Site and Their Basic Properties
- Table 2: List of Special Status Plants with Potential to Occur Onsite and/or in the Vicinity
- Table 3: List of Special Status Animals with Potential to Occur Onsite and/or in the Vicinity

ATTACHMENTS:

- Attachment A - Aerial Photos of Project Area
- Attachment B - CNDDDB Species List
- Attachment C - IPaC
- Attachment D - NRCS Soils Report

Attachment A - Aerial Photos of Project Area



Overview of Project site from Hampton Way. Imagery date 7/2022.



Overview of Project site from North Cedar Avenue. Imagery date 12/2024.

Attachment B - CNDDDB Species List



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



Query Criteria: Quad IS (Fresno North (3611977) OR Clovis (3611976))

Species	Element Code	Federal Status	State Status	Global Rank	State Rank	Rare Plant Rank/CDFW SSC or FP
American badger <i>Taxidea taxus</i>	AMAJF04010	None	None	G5	S3	SSC
American bumble bee <i>Bombus pensylvanicus</i>	IIHYM24260	None	None	G3G4	S2	
Antioch efferian robberfly <i>Efferia antiochi</i>	IIDIP07010	None	None	G1G2	S1S2	
black-crowned night heron <i>Nycticorax nycticorax</i>	ABNGA11010	None	None	G5	S4	
burrowing owl <i>Athene cunicularia</i>	ABNSB10010	None	Candidate Endangered	G4	S2	SSC
California glossy snake <i>Arizona elegans occidentalis</i>	ARADB01017	None	None	G5T2	S2	SSC
California jewelflower <i>Caulanthus californicus</i>	PDBRA31010	Endangered	Endangered	G1	S1	1B.1
California linderiella <i>Linderiella occidentalis</i>	ICBRA06010	None	None	G2G3	S2S3	
California satintail <i>Imperata brevifolia</i>	PMPOA3D020	None	None	G3	S3	2B.1
California tiger salamander - central California DPS <i>Ambystoma californiense pop. 1</i>	AAAAA01181	Threatened	Threatened	G2G3T3	S3	WL
coast horned lizard <i>Phrynosoma blainvillii</i>	ARACF12100	None	None	G4	S4	SSC
Crotch's bumble bee <i>Bombus crotchii</i>	IIHYM24480	None	Candidate Endangered	G2	S2	
double-crested cormorant <i>Nannopterum auritum</i>	ABNFD01020	None	None	G5	S4	WL
Fresno kangaroo rat <i>Dipodomys nitratoides exilis</i>	AMAFD03151	Endangered	Endangered	G2TH	SH	
great egret <i>Ardea alba</i>	ABNGA04040	None	None	G5	S4	
Greene's tuctoria <i>Tuctoria greenei</i>	PMPOA6N010	Endangered	Rare	G1	S1	1B.1
Hurd's metapogon robberfly <i>Metapogon hurdi</i>	IIDIP08010	None	None	G1G2	S1S2	
least Bell's vireo <i>Vireo bellii pusillus</i>	ABPBW01114	Endangered	Endangered	G5T2	S3	
Madera leptosiphon <i>Leptosiphon serrulatus</i>	PDPLM09130	None	None	G3	S3	1B.2
molestan blister beetle <i>Lytta molesta</i>	IICOL4C030	None	None	G2	S2	



Selected Elements by Common 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
Northern California legless lizard <i>Anniella pulchra</i>	ARACC01020	None	None	G3	S2S3	SSC
Northern Claypan Vernal Pool <i>Northern Claypan Vernal Pool</i>	CTT44120CA	None	None	G1	S1.1	
northwestern pond turtle <i>Actinemys marmorata</i>	ARAAD02031	Proposed Threatened	None	G2	SNR	SSC
San Joaquin pocket mouse <i>Perognathus inornatus</i>	AMAFD01060	None	None	G3	S2S3	
San Joaquin Valley Orcutt grass <i>Orcuttia inaequalis</i>	PMPOA4G060	Threatened	Endangered	G1	S1	1B.1
Sanford's arrowhead <i>Sagittaria sanfordii</i>	PMALI040Q0	None	None	G3	S3	1B.2
snowy egret <i>Egretta thula</i>	ABNGA06030	None	None	G5	S4	
succulent owl's-clover <i>Castilleja campestris var. succulenta</i>	PDSCR0D3Z1	Threatened	Endangered	G4?T2T3	S2S3	1B.2
Swainson's hawk <i>Buteo swainsoni</i>	ABNKC19070	None	Threatened	G5	S4	
tricolored blackbird <i>Agelaius tricolor</i>	ABPBXB0020	None	Threatened	G1G2	S2	SSC
vernal pool fairy shrimp <i>Branchinecta lynchi</i>	ICBRA03030	Threatened	None	G3	S3	
western mastiff bat <i>Eumops perotis californicus</i>	AMACD02011	None	None	G4G5T4	S3S4	SSC
western spadefoot <i>Spea hammondi</i>	AAABF02020	Proposed Threatened	None	G2G3	S3S4	SSC
western yellow-billed cuckoo <i>Coccyzus americanus occidentalis</i>	ABNRB02022	Threatened	Endangered	G5T2T3	S1	

Record Count: 34

Attachment C - IPaC



United States Department of the Interior



FISH AND WILDLIFE SERVICE
Sacramento Fish And Wildlife Office
Federal Building
2800 Cottage Way, Room W-2605
Sacramento, CA 95825-1846
Phone: (916) 414-6600 Fax: (916) 414-6713

In Reply Refer To:

07/17/2025 14:48:56 UTC

Project Code: 2025-0122987

Project Name: Granite Park Program of All-Inclusive Care (“PACE”) Facility

Subject: List of threatened and endangered species that may occur in your proposed project location or may be affected by your proposed project

To Whom It May Concern:

The enclosed species list identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, that may occur within the boundary of your proposed project and/or may be affected by your proposed project. The species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*).

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the IPaC system by completing the same process used to receive the enclosed list.

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 *et seq.*), Federal agencies are required to utilize their authorities to carry out programs for the conservation of threatened and endangered species and to determine whether projects may affect threatened and endangered species and/or designated critical habitat.

A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2)

(c)). For projects other than major construction activities, the Service suggests that a biological evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

If a Federal agency determines, based on the Biological Assessment or biological evaluation, that listed species and/or designated critical habitat may be affected by the proposed project, the agency is required to consult with the Service pursuant to 50 CFR 402. In addition, the Service recommends that candidate species, proposed species and proposed critical habitat be addressed within the consultation. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found in the "Endangered Species Consultation Handbook" at:

<https://www.fws.gov/sites/default/files/documents/endangered-species-consultation-handbook.pdf>

Migratory Birds: In addition to responsibilities to protect threatened and endangered species under the Endangered Species Act (ESA), there are additional responsibilities under the Migratory Bird Treaty Act (MBTA) and the Bald and Golden Eagle Protection Act (BGEPA) to protect native birds from project-related impacts. Any activity resulting in take of migratory birds, including eagles, is prohibited unless otherwise permitted by the U.S. Fish and Wildlife Service (50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)). For more information regarding these Acts, see <https://www.fws.gov/program/migratory-bird-permit/what-we-do>.

It is the responsibility of the project proponent to comply with these Acts by identifying potential impacts to migratory birds and eagles within applicable NEPA documents (when there is a federal nexus) or a Bird/Eagle Conservation Plan (when there is no federal nexus). Proponents should implement conservation measures to avoid or minimize the production of project-related stressors or minimize the exposure of birds and their resources to the project-related stressors. For more information on avian stressors and recommended conservation measures, see <https://www.fws.gov/library/collections/threats-birds>.

In addition to MBTA and BGEPA, Executive Order 13186: *Responsibilities of Federal Agencies to Protect Migratory Birds*, obligates all Federal agencies that engage in or authorize activities that might affect migratory birds, to minimize those effects and encourage conservation measures that will improve bird populations. Executive Order 13186 provides for the protection of both migratory birds and migratory bird habitat. For information regarding the implementation of Executive Order 13186, please visit <https://www.fws.gov/partner/council-conservation-migratory-birds>.

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation of threatened and endangered species into their project planning to further the purposes of the Act. Please include the Consultation Code in the header of this letter with any request for consultation or correspondence about your project that you submit to our office.

Attachment(s):

- Official Species List

OFFICIAL SPECIES LIST

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

Sacramento Fish And Wildlife Office

Federal Building

2800 Cottage Way, Room W-2605

Sacramento, CA 95825-1846

(916) 414-6600

PROJECT SUMMARY

Project Code: 2025-0122987
Project Name: Granite Park Program of All-Inclusive Care (“PACE”) Facility
Project Type: Recreation - New Construction
Project Description: Provost & Pritchard understands Stock Five seeks approval from the City of Fresno to construct a 20,000-square foot Program of All-Inclusive Care (“PACE”) Facility (Project) on approximately 1.15 acres on Assessor’s Parcel No. 438-220-01, -09, and -10, located at the southeast corner of North Cedar Avenue and East Hampton Way.

Project Location:

The approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@36.7920352,-119.75343071932026,14z>



Counties: Fresno County, California

ENDANGERED SPECIES ACT SPECIES

There is a total of 10 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries¹, as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

-
1. [NOAA Fisheries](#), also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

MAMMALS

NAME	STATUS
Fresno Kangaroo Rat <i>Dipodomys nitratoides exilis</i> There is final critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/5150	Endangered
San Joaquin Kit Fox <i>Vulpes macrotis mutica</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/2873	Endangered

BIRDS

NAME	STATUS
California Condor <i>Gymnogyps californianus</i> Population: Wherever found, except where listed as an experimental population There is final critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/8193	Endangered

REPTILES

NAME	STATUS
Northwestern Pond Turtle <i>Actinemys marmorata</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/1111	Proposed Threatened

AMPHIBIANS

NAME	STATUS
California Tiger Salamander <i>Ambystoma californiense</i> Population: U.S.A. (Central CA DPS) There is final critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/2076	Threatened
Western Spadefoot <i>Spea hammondi</i> Population: Northern DPS No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/5425	Proposed Threatened

INSECTS

NAME	STATUS
Monarch Butterfly <i>Danaus plexippus</i> There is proposed critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/9743	Proposed Threatened

CRUSTACEANS

NAME	STATUS
Vernal Pool Fairy Shrimp <i>Branchinecta lynchi</i> There is final critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/498	Threatened

FLOWERING PLANTS

NAME	STATUS
Fleshy Owl's-clover <i>Castilleja campestris ssp. succulenta</i> There is final critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/8095	Threatened
San Joaquin Valley Orcutt Grass <i>Orcuttia inaequalis</i> There is final critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/5506	Threatened

CRITICAL HABITATS

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

YOU ARE STILL REQUIRED TO DETERMINE IF YOUR PROJECT(S) MAY HAVE EFFECTS ON ALL ABOVE LISTED SPECIES.

IPAC USER CONTACT INFORMATION

Agency: Private Entity
Name: Olivia Arredondo
Address: 455 W. Fir Ave.
City: Clovis
State: CA
Zip: 93611
Email: oarredondo@ppeng.com
Phone: 8312970074

Attachment D - NRCS Soils Report

Soil Map—Eastern Fresno Area, California
(Stock Five Program of All-Inclusive Care Facility)



Map Scale: 1:621 if printed on A landscape (11" x 8.5") sheet.

0 5 10 20 30 Meters

0 30 60 120 180 Feet

Map projection: Web Mercator Corner coordinates: WGS84 Edge tics: UTM Zone 11N WGS84



MAP LEGEND

Area of Interest (AOI)

 Area of Interest (AOI)

Soils

 Soil Map Unit Polygons

 Soil Map Unit Lines

 Soil Map Unit Points

Special Point Features



Blowout



Borrow Pit



Clay Spot



Closed Depression



Gravel Pit



Gravelly Spot



Landfill



Lava Flow



Marsh or swamp



Mine or Quarry



Miscellaneous Water



Perennial Water



Rock Outcrop



Saline Spot



Sandy Spot



Severely Eroded Spot



Sinkhole



Slide or Slip



Sodic Spot



Spoil Area



Stony Spot



Very Stony Spot



Wet Spot



Other



Special Line Features

Water Features



Streams and Canals

Transportation



Rails



Interstate Highways



US Routes



Major Roads



Local Roads

Background



Aerial Photography

MAP INFORMATION

The soil surveys that comprise your AOI were mapped at 1:24,000.

Warning: Soil Map may not be valid at this scale.

Enlargement of maps beyond the scale of mapping can cause misunderstanding of the detail of mapping and accuracy of soil line placement. The maps do not show the small areas of contrasting soils that could have been shown at a more detailed scale.

Please rely on the bar scale on each map sheet for map measurements.

Source of Map: Natural Resources Conservation Service

Web Soil Survey URL:

Coordinate System: Web Mercator (EPSG:3857)

Maps from the Web Soil Survey are based on the Web Mercator projection, which preserves direction and shape but distorts distance and area. A projection that preserves area, such as the Albers equal-area conic projection, should be used if more accurate calculations of distance or area are required.

This product is generated from the USDA-NRCS certified data as of the version date(s) listed below.

Soil Survey Area: Eastern Fresno Area, California

Survey Area Data: Version 17, Aug 30, 2024

Soil map units are labeled (as space allows) for map scales 1:50,000 or larger.

Date(s) aerial images were photographed: Mar 16, 2022—May 30, 2022

The orthophoto or other base map on which the soil lines were compiled and digitized probably differs from the background imagery displayed on these maps. As a result, some minor shifting of map unit boundaries may be evident.

Map Unit Legend

Map Unit Symbol	Map Unit Name	Acres in AOI	Percent of AOI
TzbA	Tujunga loamy sand, 0 to 3 percent slopes	1.2	100.0%
Totals for Area of Interest		1.2	100.0%



To: Jackie Lancaster
Provost & Pritchard Consulting Group
400 E. Main Street, Suite 300
Visalia, CA 93291

Record Search 25-334

Date: August 12, 2025

Re: Stock Five Granite Park PACE Facility Project; Project No. 4376-25-001, Phase ENV

County: Fresno

Map(s): Fresno North 7.5'

CULTURAL RESOURCES RECORDS SEARCH

The California Office of Historic Preservation (OHP) contracts with the California Historical Resources Information System's (CHRIS) regional Information Centers (ICs) to maintain information in the CHRIS inventory and make it available to local, state, and federal agencies, cultural resource professionals, Native American tribes, researchers, and the public. Recommendations made by IC coordinators or their staff regarding the interpretation and application of this information are advisory only. Such recommendations do not necessarily represent the evaluation or opinion of the State Historic Preservation Officer in carrying out the OHP's regulatory authority under federal and state law.

The following are the results of a search of the cultural resource files at the Southern San Joaquin Valley Information Center. These files include known and recorded cultural resources sites, inventory and excavation reports filed with this office, and resources listed on the National Register of Historic Places, the OHP Built Environment Resources Directory, California State Historical Landmarks, California Register of Historical Resources, California Inventory of Historic Resources, and California Points of Historical Interest. Due to processing delays and other factors, not all of the historical resource reports and resource records that have been submitted to the OHP are available via this records search. Additional information may be available through the federal, state, and local agencies that produced or paid for historical resource management work in the search area.

PRIOR CULTURAL RESOURCE STUDIES CONDUCTED WITHIN THE PROJECT AREA AND THE ONE-HALF MILE RADIUS

According to the information in our files, there have been no previous cultural resource studies completed within the project area. There have been four additional studies completed within the one-half mile radius: FR-00402, 01822, 02101, & 02234.

KNOWN/RECORDED CULTURAL RESOURCES WITHIN THE PROJECT AREA AND THE ONE-HALF MILE RADIUS

According to the information in our files, there are no recorded cultural resources within the project area. There are eight recorded resources within the one-half mile radius: P-10-006647, 006857, 006858, 006859, 006860, 006861, 006862, & 007030. These resources primarily consist of historic era single family properties. They also include one historic era canal and a row of palm trees.

There are no recorded cultural resources within the project area or radius that are listed in the National Register of Historic Places, the California Register of Historical Resources, the California Points of Historical Interest, California Inventory of Historic Resources, or the California State Historic Landmarks.

COMMENTS AND RECOMMENDATIONS

We understand this project proposes the development of a 20,000 sq. ft. one-story healthcare facility. Because this project area is a vacant lot and has not been previously studied for cultural resources, it is unknown if any are present. As such, prior to ground disturbance activities, we recommend a qualified, professional consultant conduct a field survey to determine if cultural resources are present. A list of qualified consultants can be found at www.chrisinfo.org.

We also recommend that you contact the Native American Heritage Commission in Sacramento. They will provide you with a current list of Native American individuals/organizations that can assist you with information regarding cultural resources that may not be included in the CHRIS Inventory and that may be of concern to the Native groups in the area. The Commission can consult their "Sacred Lands Inventory" file to determine what sacred resources, if any, exist within this project area and the way in which these resources might be managed. Finally, please consult with the lead agency on this project to determine if any other cultural resource investigation is required. If you need any additional information or have any questions or concerns, please contact our office at (661) 654-2289.

By:



Jeremy E David, Assistant Coordinator

Date: August 12, 2025

Please note that invoices for Information Center services will be sent under separate cover from the California State University, Bakersfield Accounting Office.

NATIVE AMERICAN HERITAGE COMMISSION

August 12, 2025

Jackie Lancaster
Provost & Pritchard

Submitted via Electronic
Via Email to: jlancaster@ppeng.com

Re: Stock Five Granite Park PACE Facility Project, Fresno County

To Whom It May Concern:

As requested, a search of the Native American Heritage Commission (NAHC) Sacred Lands File (SLF) was completed based on information submitted for the above referenced project. The results were negative. Be aware that tribes do not always record their sacred sites in the SLF, nor are they required to do so. As such, an SLF search is not a substitute for consultation with all tribes that are traditionally and culturally affiliated with a project's geographic area.

Attached is a list of Native American tribes that are traditionally and culturally affiliated with the project's geographic area. Please contact all of the listed tribes as they may have information about sacred sites within the project area that is not listed with the NAHC.

If within two weeks of notification, a response has not been received, the Commission requests that you follow up with a telephone call or email to ensure that the project information was received.

If you receive notification of a change of address or phone number from a tribe, please inform the NAHC so that we can assure that our lists contain current information.

In addition to engaging in tribal consultation, you should consult the appropriate regional California Historical Research Information System (CHRIS) information center to determine whether it has information regarding the presence of recorded archaeological sites within the project area.

If you have any questions or need additional information, please contact me at: Pricilla.Torres-Fuentes@nahc.ca.gov.

Sincerely,

Pricilla Torres-Fuentes

Pricilla Torres-Fuentes
Cultural Resources Analyst

Attachment



CHAIRPERSON
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CHUMASH

VICE-CHAIRPERSON
BUFFY MCQUILLEN
YOKAYO POMO, YUKI,
NOMLAKI

SECRETARY
ISAAC BOJORQUEZ
OHLONE-COSTANOAN

PARLIAMENTARIAN
WAYNE NELSON
LUISEÑO

COMMISSIONER
SARA DUTSCHKE
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COMMISSIONER
STANLEY RODRIGUEZ
KUMEYAAY

COMMISSIONER
BENNAE CALAC
PAUMA-YUIMA BAND OF
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