

APPENDIX A

NOTICE OF PREPARATION AND PUBLIC COMMENTS ON THE NOP

This page intentionally left blank

**NOTICE OF PREPARATION
OF A DRAFT ENVIRONMENTAL IMPACT REPORT
FOR THE S. STAMOULES, INC. PISTACHIO PROCESSING FACILITY PROJECT**

Date: July 6, 2022

To: Office of Planning and Research, Responsible and Trustee Agencies, Other Public Agencies and Other Interested Parties

Subject: Notice of Preparation of Draft Environmental Impact Report for the S. Stamoules, Inc. Pistachio Processing Facility

Lead Agency: Fresno County

Contact: Ejaz Ahmad, Planner
Department of Public Works and Planning
Development Services Division
2220 Tulare Street, 6th floor
Fresno, CA 93721
(559) 600-4204
EAhmad@FresnoCountyCA.gov

Comment Period: July 8, 2022, to August 9, 2022

PURPOSE OF NOTICE

Fresno County (County) is the lead agency responsible for preparation of an Environmental Impact Report (EIR) for the S. Stamoules, Inc. Pistachio Processing Facility Project (proposed project). Pursuant to provisions of the California Environmental Quality Act (CEQA), the County has prepared this Notice of Preparation (NOP) for the proposed project. Once a decision is made to prepare an EIR, the lead agency must prepare a NOP to inform all responsible and trustee agencies that an EIR will be prepared (CEQA Guidelines Section 15082). The purpose of this NOP is to provide agencies, interested parties, and organizations with sufficient information describing the proposed project and the potential environmental effects to enable meaningful input related to the scope and content of information to be included in the EIR.

PUBLIC REVIEW PERIOD

This NOP is being circulated for public review and comment for a period of 30 days beginning July 8, 2022. The County requests that any potential Responsible or Trustee Agencies responding to this NOP reply in a manner consistent with Section 15082(b) of the CEQA Guidelines, which allows for submittal of any comments in response to this notice no later than 30 days after receipt of the NOP. Comments in response to this NOP will be accepted through 5:00 p.m., August 9, 2022. Please send your written comments to Mr. Ahmad and include your name, address, and phone number and/or email address so that we may contact you for clarification, if necessary.

PUBLIC SCOPING MEETING

The County will hold a public scoping meeting to inform interested parties about the proposed project and to provide agencies and the public with an opportunity to provide comments on the scope and content of the EIR. The meeting time and location is as follows:

Date: Monday, July 25, 2022

Time: 4 p.m. to 4:30 p.m.

Link: <http://bit.ly/stamoulesscopemeeting> Meeting ID: 220 639 430 437; Passcode: dGW56V, or

Call-in (audio only): 1 559-494-4226; Conference ID: 756 743 547#

PROJECT DESCRIPTION

S. Stamoules Inc. (Project Applicant) proposes to build a pistachio hulling, processing, and packing facility on a 98-acre portion of a 316.2-acre parcel located in western Fresno County, 8 miles southwest of the City of Mendota. Trucks carrying pistachios from the Project Applicant's orchards would deposit their load on a conveyor belt system that would transport the pistachios through different sections of the proposed facility that include a huller building, a gas-powered dryer area, a drive-over dump pit area, and an area with storage silos which are proposed to be 50 feet in height. Additionally, the processed water from the facility will be conveyed via existing subsurface piping to irrigate approximately 3,740 acres of agricultural land owned by the owner and are located approximately two to six miles to the northeast of the project site located on the northwest corner of S. Newcomb Avenue and W. Muscat Avenue approximately 9.7 mile south of the City of Firebaugh.

The proposed project would be implemented in four phases, and each phase would include the construction and addition of buildings, working areas and equipment to increase the capacity of the project site. Attached to this notice are four figures showing the project location, proposed site plan, partial Site Plan and Process Water Land Application Area.

Phase I of the project would include the construction of a 16,893 square-foot huller building, an approximately 5,608 square-foot drive-over dumping pit area, and an approximately 3,900 square-foot pre-cleaning area. Ten 8 by 29 foot dryers and 18 52- by 52-foot galvanized steel silos, each of 2,200,000-pound capacity, would be added to the project site west of the proposed huller building under Phase I of the proposed project.

Phase II of the project would include the construction of a 155,169-square-foot processing building for pistachios.

Phase III of the project would include the installation of processing, sorting, and packing equipment in the pistachio processing building, as well as the construction of twelve additional silos and the installation of ten additional dryer units.

Finally, Phase IV of the project would include the construction of a second 16,893-square-foot huller building, an additional drive-over dumping pit area and pre-cleaning area, and the construction and installation of 30 additional silos and 20 dryer units.

POTENTIAL ENVIRONMENTAL EFFECTS

The S. Stamoules, Inc. Pistachio Processing Facility EIR will evaluate the potential environmental impacts of the proposed project, after having first established the environmental setting, or baseline, for the environmental analysis. The significance of potential impacts, cumulative impacts, and appropriate mitigation measures associated with implementation of the project will be thoroughly discussed in the EIR.

The following environmental resource topic areas will be evaluated in the EIR:

- Aesthetics
- Agriculture and Forestry Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems

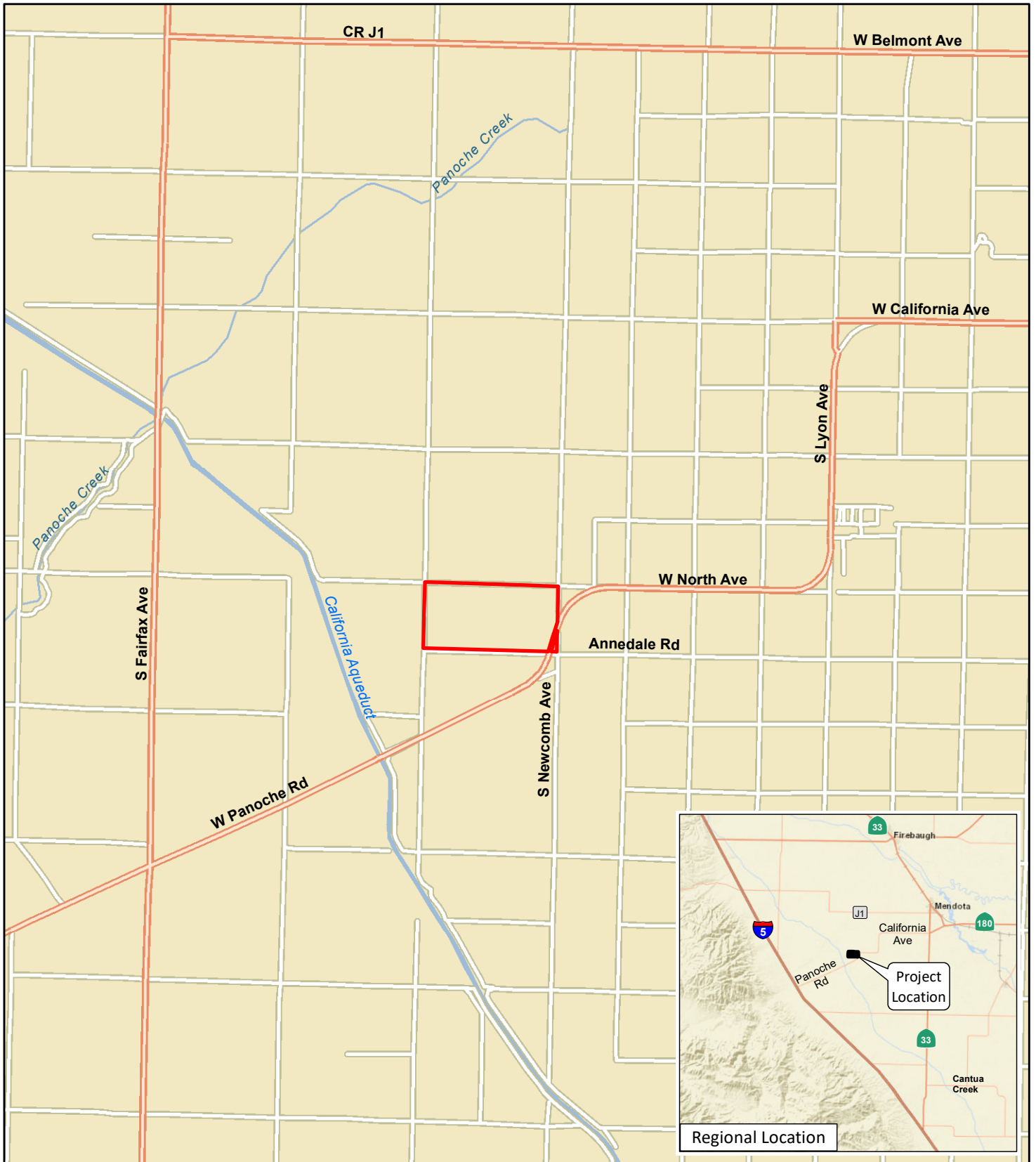
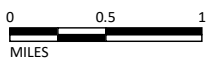


FIGURE 1

LSA

LEGEND

Project Site



SOURCE: Esri World Street Map.

\\AzCorp04\PTRIimages\OPA2101\GIS\Maps\Project Description\Figure 1_Regional and Local Location.mxd (4/18/2022)

S. Stamoules, Inc. Pistachio Processing Facility Project
Fresno County, California
Notice of Preparation
Regional and Local Location

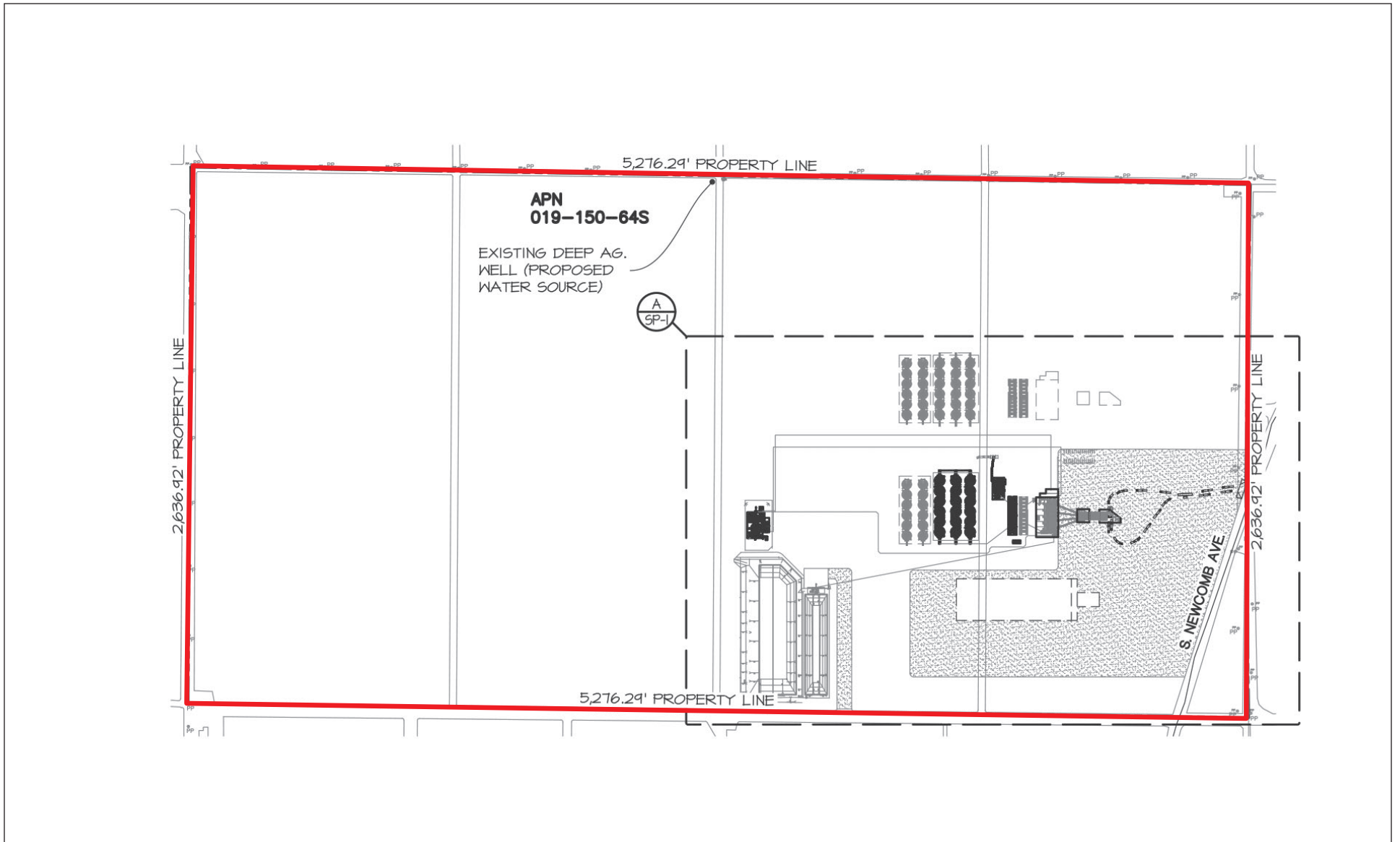


FIGURE 2

LSA



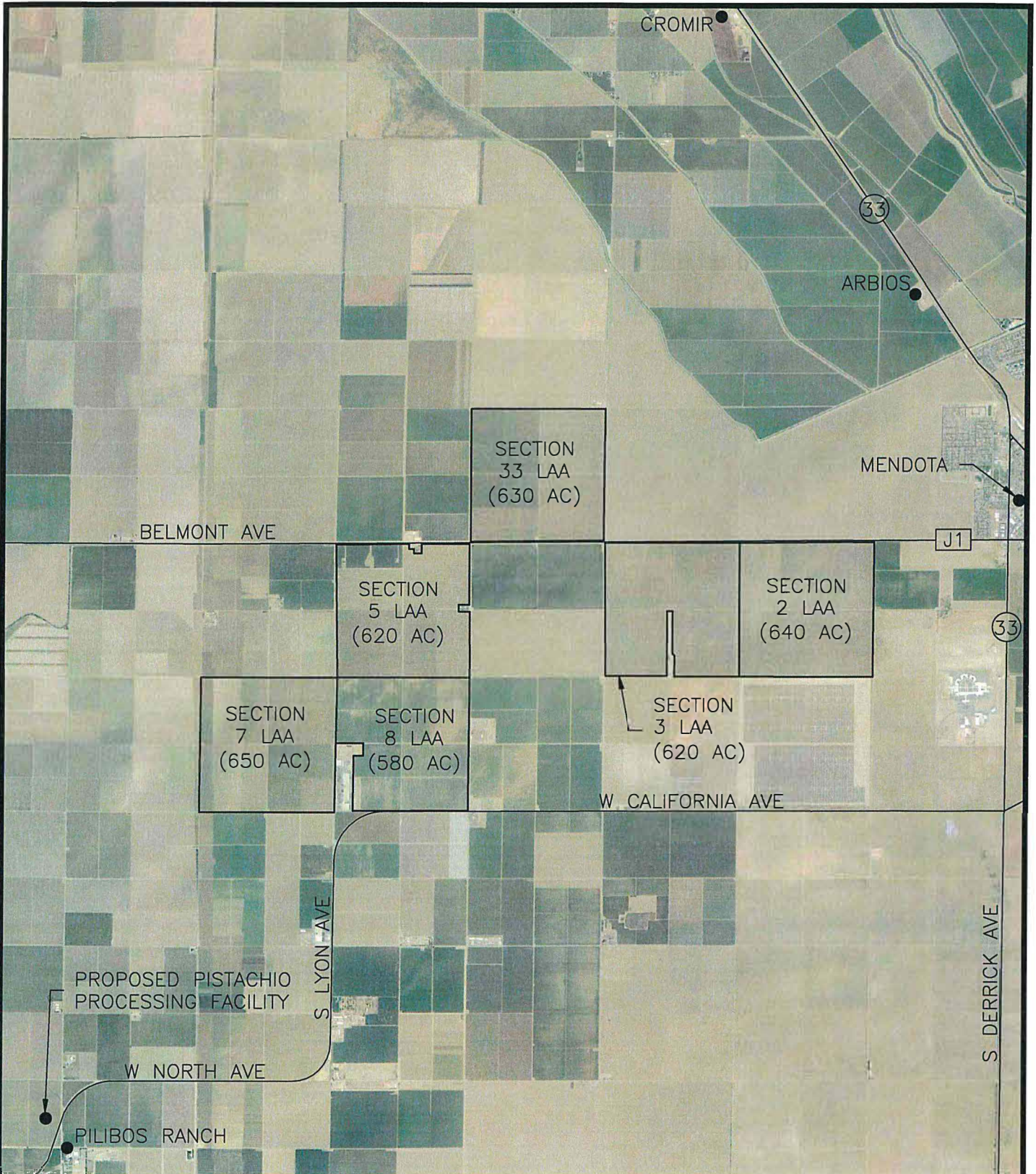
NOT TO SCALE

 Project Site Boundary

S. Stamoules, Inc. Pistachio Processing Facility Project
 Fresno County, California
Notice of Preparation
 Project Site Plan

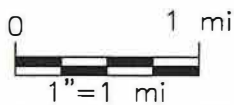
SOURCE: Engel & Company, 2020

FREProjects:\CFF2201 OPA Pistachio\PRODUCTS\Project Description\Figures\Figure 2.ai (4/19/2022)



EXPLANATION:

LAA - LAND APPLICATION AREA
 AC - ACRES



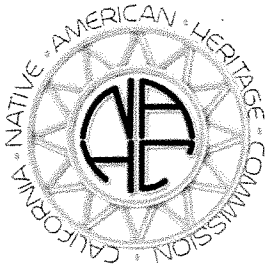
(SCALE AND LOCATIONS APPROXIMATE)

(SOURCE: Google Earth Pro Image September 2020, ©2021 Google™)

Figure 1. Site Location Map

PROJECT NUMBER: 2021210059	S. Stamoules Pistachio Processing Facility Conditional Use Permit Application: Projected Land Application Area
DATE: 5 '24 '2021	
DWG NO: 2020210059 F1.DWG	South Valley Engineers S. Newcomb Ave. APN 019-150-64S Mendota, California 93640
DWG BY: PROJECT MANAGER: 6NSG 10MSS	
REVISED:	

VALLEY SCIENCE AND ENGI



NATIVE AMERICAN HERITAGE COMMISSION

July 8, 2022

Ejaz Ahmad
County of Fresno
2220 Tulare Street, Sixth Floor
Fresno, CA 93721

Re: 2022070101, S. Stamoules, Inc. Pistachio Processing Facility Project, Fresno County

Dear Ejaz Ahmad:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, § 15064.5 (b) (CEQA Guidelines § 15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines §15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.

CHAIRPERSON
Laura Miranda
Luiseño

VICE CHAIRPERSON
Reginald Pagaling
Chumash

PARLIAMENTARIAN
Russell Atebery
Karuk

SECRETARY
Sara Dutschke
Miwok

COMMISSIONER
William Mungary
Paiute/White Mountain
Apache

COMMISSIONER
Isaac Bojorquez
Ohlone-Costanoan

COMMISSIONER
Buffy McQuillen
Yokayo Pomo, Yuki,
Nomlaki

COMMISSIONER
Wayne Nelson
Luiseño

COMMISSIONER
Stanley Rodriguez
Kumeyaay

EXECUTIVE SECRETARY
Raymond C. Hitchcock
Miwok/Nisenan

NAHC HEADQUARTERS
1550 Harbor Boulevard
Suite 100
West Sacramento,
California 95691
(916) 373-3710
nahc@nahc.ca.gov
NAHC.ca.gov

AB 52

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

- 1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project:** Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:

 - a. A brief description of the project.
 - b. The lead agency contact information.
 - c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
 - d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).

- 2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report:** A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1(b)).

 - a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).

- 3. Mandatory Topics of Consultation If Requested by a Tribe:** The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:

 - a. Alternatives to the project.
 - b. Recommended mitigation measures.
 - c. Significant effects. (Pub. Resources Code §21080.3.2 (a)).

- 4. Discretionary Topics of Consultation:** The following topics are discretionary topics of consultation:

 - a. Type of environmental review necessary.
 - b. Significance of the tribal cultural resources.
 - c. Significance of the project's impacts on tribal cultural resources.
 - d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).

- 5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process:** With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).

- 6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document:** If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:

 - a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
 - b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

- 7. Conclusion of Consultation:** Consultation with a tribe shall be considered concluded when either of the following occurs:
- a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
 - b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).
- 8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document:** Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).
- 9. Required Consideration of Feasible Mitigation:** If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).
- 10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:**
- a. Avoidance and preservation of the resources in place, including, but not limited to:
 - i. Planning and construction to avoid the resources and protect the cultural and natural context.
 - ii. Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
 - b. Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
 - i. Protecting the cultural character and integrity of the resource.
 - ii. Protecting the traditional use of the resource.
 - iii. Protecting the confidentiality of the resource.
 - c. Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
 - d. Protecting the resource. (Pub. Resource Code §21084.3 (b)).
 - e. Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
 - f. Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).
- 11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource:** An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
- a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
 - b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
 - c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf.

Some of SB 18's provisions include:

1. **Tribal Consultation:** If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. **No Statutory Time Limit on SB 18 Tribal Consultation.** There is no statutory time limit on SB 18 tribal consultation.
3. **Confidentiality:** Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. **Conclusion of SB 18 Tribal Consultation:** Consultation should be concluded at the point in which:
 - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
 - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>.

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (https://ohp.parks.ca.gov/?page_id=30331) for an archaeological records search. The records search will determine:
 - a. If part or all of the APE has been previously surveyed for cultural resources.
 - b. If any known cultural resources have already been recorded on or adjacent to the APE.
 - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
 - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
 - b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

3. Contact the NAHC for:
 - a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
 - b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.

4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
 - a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, §15064.5(f) (CEQA Guidelines §15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
 - b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
 - c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code §7050.5, Public Resources Code §5097.98, and Cal. Code Regs., tit. 14, §15064.5, subdivisions (d) and (e) (CEQA Guidelines §15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address:
Cameron.Vela@nahc.ca.gov.

Sincerely,

Cameron Vela

Cameron Vela
Cultural Resources Analyst

cc: State Clearinghouse

From: [Sarah Pilibos](#)
To: [Ahmad, Ejaz](#)
Cc: [Randall, David A.](#); [Duane Urbanek](#); [Catherine Pilibos](#)
Subject: RE: Stamoules Pistachio Processing Plant - EIR response
Date: Thursday, August 11, 2022 10:33:46 AM
Attachments: [image001.png](#)

I appreciate that very much. What is the next step with this process? Who should I follow up with to see how our concerns will be handled?

Thank you.

Sarah

From: Ahmad, Ejaz <EAhmad@fresnocountyca.gov>
Sent: Thursday, August 11, 2022 10:06 AM
To: Sarah Pilibos <sarah@pilibosproperties.com>
Cc: Randall, David A. <drandall@fresnocountyca.gov>
Subject: Stamoules Pistachio Processing Plant - EIR response

Dear Ms. Sarah,

Thanks for your email. Your concerns has been noted.

Regards!.



Ejaz Ahmad | Planner

**Department of Public Works and Planning | Development Services and
Capital Projects Division/Current Planning Section**

2220 Tulare St. 6th Floor Fresno, CA 93721

Main Office: (559) 600-4497 Direct: (559) 600-4204

[Your input matters! Customer Service Survey](#)

From: Sarah Pilibos <sarah@pilibosproperties.com>
Sent: Tuesday, August 9, 2022 2:25 PM
To: Ahmad, Ejaz <EAhmad@fresnocountyca.gov>
Cc: Duane Urbanek <duane@pilibosranch.com>; Catherine Pilibos <cat@pilibosproperties.com>
Subject: Stamoules Pistachio Processing Plant - EIR response

CAUTION!!! - EXTERNAL EMAIL - THINK BEFORE YOU CLICK

Dear Mr. Ahmad:

Per the July 25, 2022 public hearing regarding the above development, please accept this response on behalf of the Pilibos family ranching operation & owners. We wish to express our serious concerns as to how the land use, as proposed will directly impact our land use, and access needed regarding our access to public road, our farming operation transportation, as well as our air and water quality.

One immediate observation we have is that the facility's entrance (as presently designed) chokes access to our ranch entrance on S. Newcombe. That strangles access to our field roads southeast & southwest. A second observation of immediate concern is that this access junction (as presently designed) abuts a

permanent orchard of pomegranates (see Figure 3 highlighted areas attached). We do not wish to lose this field or any portion of it to either eminent domain or easement to accommodate an enlarged county road. We assert that any road enlargements be redirected and reposition from Stamoules land onto public access that is significantly more distant than our land.

These are our initial concerns. We will follow up with a more detailed, professional study as the process continues. Kindly direct us to the appropriate personnel with whom we can continue this discussion.

In closing, we hope there is flexibility in the designed plans as we are responding early to the development. We appreciate the financial impact of such an endeavor is to the county, but we also presume it will not be permitted to interrupt or abuse our land or current operation.

Thank you in advance for your attention to this matter.

Sincerely.

Sarah Pilibos

President

Stephen Investments/Pilibos Bros

Pilibos Sister, Inc. & the Y. Stephen & Lucille Pilibos Trust

2141 Tuolumne Street, Suite "A"

Fresno, CA 93721

Office: (559) 268-0101

Facsimile: (559) 268-7246

Email: Sarah@pilibosproperties.com

CONFIDENTIAL

This email contains confidential information and is intended only for the recipient(s) to whom it has been initially directed. Any dissemination, distribution, redirection or copying of this document, its contents and/or attachments is strictly prohibited. Any party receiving this email in error is notified to immediately delete this message from its system and notify the sender.

August 11, 2022

Ejaz Ahmad
County of Fresno
Department of Public Works and Planning
2220 Tulare Street, 6th floor
Fresno, CA 93721

**Project: Notice of Preparation of a Draft Environmental Impact Report – S.
Stamoules, Inc. Pistachio Processing Facility Project**

District CEQA Reference No: 20221001

Dear Mr. Ahmad:

The San Joaquin Valley Air Pollution Control District (District) has reviewed the Notice of Preparation from the County of Fresno (County) for the above mentioned project. Per the Notice of Preparation for the Draft Environmental Impact Report (DEIR), the project consists of the construction and operation of a pistachio hulling, processing and packing facility to be constructed in the following four phases (Project):

- Phase 1: construction of a 16,893 square foot huller building, approximately 5,608 square foot drive-over dumping pit area, approximately 3,900 square foot pre-cleaning area, ten 8x29 foot dryers, and eighteen 52x52 foot galvanized steel silos.
- Phase 2: construction of a 155,169 square foot processing building for pistachios.
- Phase 3: installation of a processing, sorting, and packing equipment in the pistachio processing building. Including twelve additional silos and the installation of ten additional dryer units.
- Phase 4: construction of a second 16,893 square foot huller building, and additional drive-over dumping pit area and pre-cleaning area, and the construction and installation of 30 additional silos and 20 dryer units.

Samir Sheikh
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
Tel: (209) 557-6400 FAX: (209) 557-6475

Central Region (Main Office)
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244
Tel: (559) 230-6000 FAX: (559) 230-6061

Southern Region
34946 Flyover Court
Bakersfield, CA 93308-9725
Tel: (661) 392-5500 FAX: (661) 392-5585

The District offers the following comments regarding the Project:

1) Project Related Emissions

At the federal level under the National Ambient Air Quality Standards (NAAQS), the District is designated as extreme nonattainment for the 8-hour ozone standards and serious nonattainment for the particulate matter less than 2.5 microns in size (PM_{2.5}) standards. At the state level under California Ambient Air Quality Standards (CAAQS), the District is designated as nonattainment for the 8-hour ozone, PM₁₀, PM_{2.5} standards.

The District's initial review of the Project concludes that emissions resulting from construction and/or operation of the Project may exceed any of the following significance thresholds as identified in the District's Guidance for Assessing and Mitigating Air Quality Impacts: <https://www.valleyair.org/transportation/GAMAQI.pdf>. The District recommends that a more detailed preliminary review of the Project be conducted for the Project's construction and operational emissions.

1a) Construction Emissions

The District recommends, to reduce impacts from construction-related diesel exhaust emissions, the Project should utilize the cleanest available off-road construction equipment, including the latest tier equipment.

1b) Operational Emissions

Operational (ongoing) air emissions from mobile sources and stationary sources should be analyzed separately. For reference, the District's significance thresholds are identified in the District's Guidance for Assessing and Mitigating Air Quality Impacts: <https://www.valleyair.org/transportation/GAMAQI.pdf>.

Recommended Mitigation Measure: At a minimum, project related impacts on air quality should be reduced to levels of significance through incorporation of design elements such as the use of cleaner Heavy Heavy-Duty (HHD) trucks and vehicles, measures that reduce Vehicle Miles Traveled (VMTs), and measures that increase energy efficiency. More information on transportation mitigation measures can be found at:

<http://www.valleyair.org/transportation/Mitigation-Measures.pdf>.

1c) Recommended Model for Quantifying Air Emissions

Project-related criteria pollutant emissions from construction and operational sources should be identified and quantified. Emissions analysis should be performed using the California Emission Estimator Model (CalEEMod), which

uses the most recent CARB-approved version of relevant emissions models and emission factors. CalEEMod is available to the public and can be downloaded from the CalEEMod website at: www.caleemod.com.

2) Health Risk Screening/Assessment

The County should evaluate the risk associated with the Project for sensitive receptors (residences, businesses, hospitals, day-care facilities, health care facilities, etc.) in the area and mitigate any potentially significant risk to help limit exposure of sensitive receptors to emissions.

To determine potential health impacts on surrounding receptors (residences, businesses, hospitals, day-care facilities, health care facilities, etc.) a Prioritization and/or a Health Risk Assessment (HRA) should be performed for the Project. These health risk determinations should quantify and characterize potential Toxic Air Contaminants (TACs) identified by the Office of Environmental Health Hazard Assessment/California Air Resources Board (OEHHA/CARB) that pose a present or potential hazard to human health.

Health risk analyses should include all potential air emissions from the project, which include emissions from construction of the project, including multi-year construction, as well as ongoing operational activities of the project. Note, two common sources of TACs can be attributed to diesel exhaust emitted from heavy-duty off-road earth moving equipment during construction, and from ongoing operation of heavy-duty on-road trucks.

Prioritization (Screening Health Risk Assessment):

A "Prioritization" is the recommended method for a conservative screening-level health risk assessment. The Prioritization should be performed using the California Air Pollution Control Officers Association's (CAPCOA) methodology.

The District recommends that a more refined analysis, in the form of an HRA, be performed for any project resulting in a Prioritization score of 10 or greater. This is because the prioritization results are a conservative health risk representation, while the detailed HRA provides a more accurate health risk evaluation.

To assist land use agencies and project proponents with Prioritization analyses, the District has created a prioritization calculator based on the aforementioned CAPCOA guidelines, which can be found here:

http://www.valleyair.org/busind/pto/emission_factors/Criteria/Toxics/Utilities/PRIORITIZATION-CALCULATOR.xls

Health Risk Assessment:

Prior to performing an HRA, it is strongly recommended that land use agencies/project proponents develop and submit for District review a health risk modeling

protocol that outlines the sources and methodologies that will be used to perform the HRA. This step will ensure all components are addressed when performing the HRA.

A development project would be considered to have a potentially significant health risk if the HRA demonstrates that the project-related health impacts would exceed the District's significance threshold of 20 in a million for carcinogenic risk, or 1.0 for either the Acute or Chronic Hazard Indices.

A project with a significant health risk would trigger all feasible mitigation measures. The District strongly recommends that development projects that result in a significant health risk not be approved by the land use agency.

The District is available to review HRA protocols and analyses. For HRA submittals please provide the following information electronically to the District for review:

- HRA (AERMOD) modeling files
- HARP2 files
- Summary of emissions source locations, emissions rates, and emission factor calculations and methodologies.

For assistance, please contact the District's Technical Services Department by:

- E-Mailing inquiries to: hramodeler@valleyair.org
- Calling (559) 230-5900

Recommended Measure: Development projects resulting in TAC emissions should be located an adequate distance from residential areas and other sensitive receptors in accordance to CARB's Air Quality and Land Use Handbook: A Community Health Perspective located at <https://ww3.arb.ca.gov/ch/handbook.pdf>.

3) Ambient Air Quality Analysis

An Ambient Air Quality Analysis (AAQA) uses air dispersion modeling to determine if emissions increases from a project will cause or contribute to a violation of State or National Ambient Air Quality Standards. The District recommends an AAQA be performed for the Project if emissions exceed 100 pounds per day of any pollutant.

An acceptable analysis would include emissions from both project-specific permitted and non-permitted equipment and activities. The District recommends consultation with District staff to determine the appropriate model and input data to use in the analysis.

Specific information for assessing significance, including screening tools and

modeling guidance, is available online at the District's website:
www.valleyair.org/ceqa.

4) Voluntary Emission Reduction Agreement

Criteria pollutant emissions may result in emissions exceeding the District's significance thresholds, potentially resulting in a significant impact on air quality. When a project is expected to have a significant impact, the District recommends the DEIR also include a discussion on the feasibility of implementing a Voluntary Emission Reduction Agreement (VERA) for this Project.

A VERA is a mitigation measure by which the project proponent provides pound-for-pound mitigation of emissions increases through a process that develops, funds, and implements emission reduction projects, with the District serving a role of administrator of the emissions reduction projects and verifier of the successful mitigation effort. To implement a VERA, the project proponent and the District enter into a contractual agreement in which the project proponent agrees to mitigate project specific emissions by providing funds for the District's incentives programs. The funds are disbursed by the District in the form of grants for projects that achieve emission reductions. Thus, project-related impacts on air quality can be mitigated. Types of emission reduction projects that have been funded in the past include electrification of stationary internal combustion engines (such as agricultural irrigation pumps), replacing old heavy-duty trucks with new, cleaner, more efficient heavy-duty trucks, and replacement of old farm tractors.

In implementing a VERA, the District verifies the actual emission reductions that have been achieved as a result of completed grant contracts, monitors the emission reduction projects, and ensures the enforceability of achieved reductions. After the project is mitigated, the District certifies to the Lead Agency that the mitigation is completed, providing the Lead Agency with an enforceable mitigation measure demonstrating that project-related emissions have been mitigated. To assist the Lead Agency and project proponent in ensuring that the environmental document is compliant with CEQA, the District recommends the environmental document includes an assessment of the feasibility of implementing a VERA.

5) Industrial/Warehouse Emission Reduction Strategies

The District recommends the County consider the feasibility of incorporating emission reduction strategies that can reduce potential harmful health impacts, such as those listed below:

- Ensure solid screen buffering trees, solid decorative walls, and/or other natural ground landscaping techniques are implemented along the property line of adjacent sensitive receptors
- Ensure all landscaping be drought tolerant

- Orient loading docks away from sensitive receptors unless physically impossible
- Locate loading docks a minimum of 300 feet away from the property line of sensitive receptor unless dock is exclusively used for electric trucks
- Incorporate signage and “pavement markings” to clearly identify on-site circulation patterns to minimize unnecessary on-site vehicle travel
- Locate truck entries on streets of a higher commercial classification
- Ensure all building roofs are solar-ready
- Ensure all portions of roof tops that are not covered with solar panels are constructed to have light colored roofing material with a solar reflective index of greater than 78
- Ensure rooftop solar panels are installed and operated to supply 100% of the power needed to operate all non-refrigerated portions of the development project
- Ensure power sources at loading docks for all refrigerated trucks have “plugin” capacity, which will eliminate prolonged idling while loading and unloading goods
- Incorporate bicycle racks and electric bike plug-ins
- Require the use of low volatile organic compounds (VOC) architectural and industrial maintenance coatings
- Designate an area during construction to charge electric powered construction vehicles and equipment, if temporary power is available
- Prohibit the use of non-emergency diesel-powered generators during construction
- Inform the project proponent of the incentive programs (e.g., Carl Moyer Program and Voucher Incentive Program) offered to reduce air emissions from the Project

6) Truck Routing

Truck routing involves the assessment of which roads Heavy Heavy-Duty (HHD) trucks take to and from their destination, and the emissions impact that the HHD trucks may have on residential communities and sensitive receptors. Since the Project consists of the construction and operation of a pistachio hulling, processing and packing facility, the Project has the potential to generate HHD truck trips.

The District recommends the County evaluate HHD truck routing patterns for the Project, with the aim of limiting exposure of residential communities and sensitive receptors to emissions. This evaluation would consider the current truck routes, the quantity and type of each truck (e.g., Medium Heavy-Duty, HHD, etc.), the destination and origin of each trip, traffic volume correlation with the time of day or the day of the week, overall Vehicle Miles Traveled (VMT), and associated exhaust emissions. The truck routing evaluation would also identify alternative truck routes and their impacts on VMT and air quality.

7) Cleanest Available Heavy-Duty Trucks

The San Joaquin Valley will not be able to attain stringent health-based federal air quality standards without significant reductions in emissions from HHD trucks, the single largest source of NO_x emissions in the San Joaquin Valley. The District's CARB-approved 2018 PM_{2.5} Plan includes significant new reductions from HHD trucks, including emissions reductions by 2023 through the implementation of CARB's Statewide Truck and Bus Regulation, which requires truck fleets operating in California to meet the 2010 standard of 0.2 g-NO_x/bhp-hr by 2023. Additionally, to meet federal air quality attainment standards, the District's Plan relies on a significant and immediate transition of HHD fleets to zero or near-zero emissions technologies, including the near-zero truck standard of 0.02 g/bhp-hr NO_x established by CARB.

Since the Project consists of the construction and operation of a pistachio hulling, processing and packing facility, the Project has the potential to generate HHD truck trips. Since the Project may exceed the District significance thresholds, the District recommends that the following measures be considered by the County to reduce Project-related operational emissions:

- *Recommended Measure:* Fleets associated with operational activities utilize the cleanest available HHD trucks, including zero and near-zero (0.02 g/bhp-hr NO_x) technologies.
- *Recommended Measure:* All on-site service equipment (cargo handling, yard hostlers, forklifts, pallet jacks, etc.) utilize zero-emissions technologies.

8) Reduce Idling of Heavy-Duty Trucks

The goal of this strategy is to limit the potential for localized PM_{2.5} and toxic air contaminant impacts associated with the idling of Heavy-Duty trucks. The diesel exhaust from idling has the potential to impose significant adverse health and environmental impacts.

Since the Project is expected to result in HHD truck trips, the District recommends the DEIR to include measures to ensure compliance of the state anti-idling regulation (13 CCR § 2485 and 13 CCR § 2480) and discuss the importance of limiting the amount of idling, especially near sensitive receptors. In addition, the District recommends the County consider the feasibility of implementing a more stringent 3-minute idling restriction and requiring appropriate signage and enforcement of idling restrictions.

9) Electric On-Site Off-Road and On-Road Equipment

The Project may have the potential to result in increased use of off-road equipment (e.g., forklifts) and on-road equipment (e.g., mobile yard trucks with the ability to move materials). The District recommends that the DEIR include requirements for project proponents to utilize electric or zero emission off-road and on-road equipment.

10)Vegetative Barriers and Urban Greening

There are single family residential units located south east and north east of the Project. The District suggests the County consider the feasibility of incorporating vegetative barriers and urban greening as a measure to further reduce air pollution exposure on sensitive receptors (e.g., residential units).

While various emission control techniques and programs exist to reduce air quality emissions from mobile and stationary sources, vegetative barriers have been shown to be an additional measure to potentially reduce a population's exposure to air pollution through the interception of airborne particles and the uptake of gaseous pollutants. Examples of vegetative barriers include, but are not limited to the following: trees, bushes, shrubs, or a mix of these. Generally, a higher and thicker vegetative barrier with full coverage will result in greater reductions in downwind pollutant concentrations. In the same manner, urban greening is also a way to help improve air quality and public health in addition to enhancing the overall beautification of a community with drought tolerant, low-maintenance greenery.

11)On-Site Solar Deployment

It is the policy of the State of California that renewable energy resources and zero-carbon resources supply 100% of retail sales of electricity to California end-use customers by December 31, 2045. While various emission control techniques and programs exist to reduce air quality emissions from mobile and stationary sources, the production of solar energy is contributing to improving air quality and public health. The District suggests that the County consider incorporating solar power systems as an emission reduction strategy for the Project.

12)District Rules and Regulations

The District issues permits for many types of air pollution sources, and regulates some activities that do not require permits. A project subject to District rules and regulations would reduce its impacts on air quality through compliance with the District's regulatory framework. In general, a regulation is a collection of individual rules, each of which deals with a specific topic. As an example, Regulation II (Permits) includes District Rule 2010 (Permits Required), Rule 2201 (New and Modified Stationary Source Review), Rule 2520 (Federally Mandated Operating

Permits), and several other rules pertaining to District permitting requirements and processes.

The list of rules below is neither exhaustive nor exclusive. Current District rules can be found online at: www.valleyair.org/rules/1ruleslist.htm. To identify other District rules or regulations that apply to future projects, or to obtain information about District permit requirements, the project proponents are strongly encouraged to contact the District's Small Business Assistance (SBA) Office at (559) 230-5888.

12a) District Rules 2010 and 2201 - Air Quality Permitting for Stationary Sources

Stationary Source emissions include any building, structure, facility, or installation which emits or may emit any affected pollutant directly or as a fugitive emission. District Rule 2010 (Permits Required) requires operators of emission sources to obtain an Authority to Construct (ATC) and Permit to Operate (PTO) from the District. District Rule 2201 (New and Modified Stationary Source Review) requires that new and modified stationary sources of emissions mitigate their emissions using Best Available Control Technology (BACT).

This Project will be subject to District Rule 2010 (Permits Required) and Rule 2201 (New and Modified Stationary Source Review) and will require District permits. Prior to construction, the Project proponent should submit to the District an application for an ATC. For further information or assistance, the project proponent may contact the District's SBA Office at (559) 230-5888.

12b) District Rule 9510 - Indirect Source Review (ISR)

Per District Rule 9510 section 4.4.3, a development project on a facility whose primary functions are subject to District Rule 2201 or District Rule 2010 are exempt from the requirements of the rule. The District has reviewed the information provided and has determined that the primary functions of this Project are subject to District Rule 2201 (New and Modified Stationary Source Review Rule) or District Rule 2010 (Permits Required). As a result, District Rule 9510 requirements and related fees do not apply to the Project referenced above.

12c) District Rule 9410 (Employer Based Trip Reduction)

The Project may be subject to District Rule 9410 (Employer Based Trip Reduction) if the project would result in employment of 100 or more "eligible" employees. District Rule 9410 requires employers with 100 or more "eligible" employees at a worksite to establish an Employer Trip Reduction Implementation Plan (eTRIP) that encourages employees to reduce single-occupancy vehicle trips, thus reducing pollutant emissions associated with work

commutes. Under an eTRIP plan, employers have the flexibility to select the options that work best for their worksites and their employees.

Information about District Rule 9410 can be found online at:
www.valleyair.org/tripreduction.htm.

For additional information, you can contact the District by phone at 559-230-6000 or by e-mail at etrip@valleyair.org

12d) District Rule 4601 (Architectural Coatings)

The Project may be subject to District Rule 4601 since it may utilize architectural coatings. Architectural coatings are paints, varnishes, sealers, or stains that are applied to structures, portable buildings, pavements or curbs. The purpose of this rule is to limit VOC emissions from architectural coatings. In addition, this rule specifies architectural coatings storage, cleanup and labeling requirements. Additional information on how to comply with District Rule 4601 requirements can be found online at:
<http://www.valleyair.org/rules/currentrules/r4601.pdf>

12e) District Regulation VIII (Fugitive PM10 Prohibitions)

The project proponent may be required to submit a Construction Notification Form or submit and receive approval of a Dust Control Plan prior to commencing any earthmoving activities as described in Regulation VIII, specifically Rule 8021 – *Construction, Demolition, Excavation, Extraction, and Other Earthmoving Activities*.

Should the project result in at least 1-acre in size, the project proponent shall provide written notification to the District at least 48 hours prior to the project proponents intent to commence any earthmoving activities pursuant to District Rule 8021 (Construction, Demolition, Excavation, Extraction, and Other Earthmoving Activities). Also, should the project result in the disturbance of 5-acres or more, or will include moving, depositing, or relocating more than 2,500 cubic yards per day of bulk materials, the project proponent shall submit to the District a Dust Control Plan pursuant to District Rule 8021 (Construction, Demolition, Excavation, Extraction, and Other Earthmoving Activities). For additional information regarding the written notification or Dust Control Plan requirements, please contact District Compliance staff at (559) 230-5950.

The application for both the Construction Notification and Dust Control Plan can be found online at:
<https://www.valleyair.org/busind/comply/PM10/forms/DCP-Form.docx>

Information about District Regulation VIII can be found online at:
http://www.valleyair.org/busind/comply/pm10/compliance_pm10.htm

12f) Other District Rules and Regulations

The Project may also be subject to the following District rules: Rule 4102 (Nuisance) and Rule 4641 (Cutback, Slow Cure, and Emulsified Asphalt, Paving and Maintenance Operations).

13) District Comment Letter

The District recommends that a copy of the District's comments be provided to the Project proponent.

If you have any questions or require further information, please contact Harout Sagherian by e-mail at Harout.Sagherian@valleyair.org or by phone at (559) 230-5860.

Sincerely,

Brian Clements
Director of Permit Services



Mark Montelongo
Program Manager

RECEIVED
JUL 11 2022
SJVUAPCD

**NOTICE OF PREPARATION
OF A DRAFT ENVIRONMENTAL IMPACT REPORT
FOR THE S. STAMOULES, INC. PISTACHIO PROCESSING FACILITY PROJECT**

Date: July 6, 2022

To: Office of Planning and Research, Responsible and Trustee Agencies, Other Public Agencies and Other Interested Parties

Subject: Notice of Preparation of Draft Environmental Impact Report for the S. Stamoules, Inc. Pistachio Processing Facility

Lead Agency: Fresno County

Contact: Ejaz Ahmad, Planner
Department of Public Works and Planning
Development Services Division
2220 Tulare Street, 6th floor
Fresno, CA 93721
(559) 600-4204
EAhmad@FresnoCountyCA.gov

Comment Period: July 8, 2022, to August 9, 2022

PURPOSE OF NOTICE

Fresno County (County) is the lead agency responsible for preparation of an Environmental Impact Report (EIR) for the S. Stamoules, Inc. Pistachio Processing Facility Project (proposed project). Pursuant to provisions of the California Environmental Quality Act (CEQA), the County has prepared this Notice of Preparation (NOP) for the proposed project. Once a decision is made to prepare an EIR, the lead agency must prepare a NOP to inform all responsible and trustee agencies that an EIR will be prepared (CEQA Guidelines Section 15082). The purpose of this NOP is to provide agencies, interested parties, and organizations with sufficient information describing the proposed project and the potential environmental effects to enable meaningful input related to the scope and content of information to be included in the EIR.

PUBLIC REVIEW PERIOD

This NOP is being circulated for public review and comment for a period of 30 days beginning July 8, 2022. The County requests that any potential Responsible or Trustee Agencies responding to this NOP reply in a manner consistent with Section 15082(b) of the CEQA Guidelines, which allows for submittal of any comments in response to this notice no later than 30 days after receipt of the NOP. Comments in response to this NOP will be accepted through 5:00 p.m., August 9, 2022. Please send your written comments to Mr. Ahmad and include your name, address, and phone number and/or email address so that we may contact you for clarification, if necessary.

RECEIVED
STAMOULES
PUBLIC SCOPING MEETING

The County will hold a public scoping meeting to inform interested parties about the proposed project and to provide agencies and the public with an opportunity to provide comments on the scope and content of the EIR. The meeting time and location is as follows:

Date: Monday, July 25, 2022

Time: 4 p.m. to 4:30 p.m.

Link: <http://bit.ly/stamoulesscopemeeting> Meeting ID: 220 639 430 437; Passcode: dGW56V, or

Call-in (audio only): 1 559-494-4226; Conference ID: 756 743 547#

PROJECT DESCRIPTION

S. Stamoules Inc. (Project Applicant) proposes to build a pistachio hulling, processing, and packing facility on a 98-acre portion of a 316.2-acre parcel located in western Fresno County, 8 miles southwest of the City of Mendota. Trucks carrying pistachios from the Project Applicant's orchards would deposit their load on a conveyor belt system that would transport the pistachios through different sections of the proposed facility that include a huller building, a gas-powered dryer area, a drive-over dump pit area, and an area with storage silos which are proposed to be 50 feet in height. Additionally, the processed water from the facility will be conveyed via existing subsurface piping to irrigate approximately 3,740 acres of agricultural land owned by the owner and are located approximately two to six miles to the northeast of the project site located on the northwest corner of S. Newcomb Avenue and W. Muscat Avenue approximately 9.7 mile south of the City of Firebaugh.

The proposed project would be implemented in four phases, and each phase would include the construction and addition of buildings, working areas and equipment to increase the capacity of the project site. Attached to this notice are four figures showing the project location, proposed site plan, partial Site Plan and Process Water Land Application Area.

Phase I of the project would include the construction of a 16,893 square-foot huller building, an approximately 5,608 square-foot drive-over dumping pit area, and an approximately 3,900 square-foot pre-cleaning area. Ten 8 by 29 feet dryers and 18 52- by 52-foot galvanized steel silos, each of 2,200,000-pound capacity, would be added to the project site west of the proposed huller building under Phase I of the proposed project.

Phase II of the project would include the construction of a 155,169-square-foot processing building for pistachios.

Phase III of the project would include the installation of processing, sorting, and packing equipment in the pistachio processing building, as well as the construction of twelve additional silos and the installation of ten additional dryer units.

Finally, Phase IV of the project would include the construction of a second 16,893-square-foot huller building, an additional drive-over dumping pit area and pre-cleaning area, and the construction and installation of 30 additional silos and 20 dryer units.

POTENTIAL ENVIRONMENTAL EFFECTS

The S. Stamoules, Inc. Pistachio Processing Facility EIR will evaluate the potential environmental impacts of the proposed project, after having first established the environmental setting, or baseline, for the environmental analysis. The significance of potential impacts, cumulative impacts, and appropriate mitigation measures associated with implementation of the project will be thoroughly discussed in the EIR.

The following environmental resource topic areas will be evaluated in the EIR:

- Aesthetics
- Agriculture and Forestry Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems

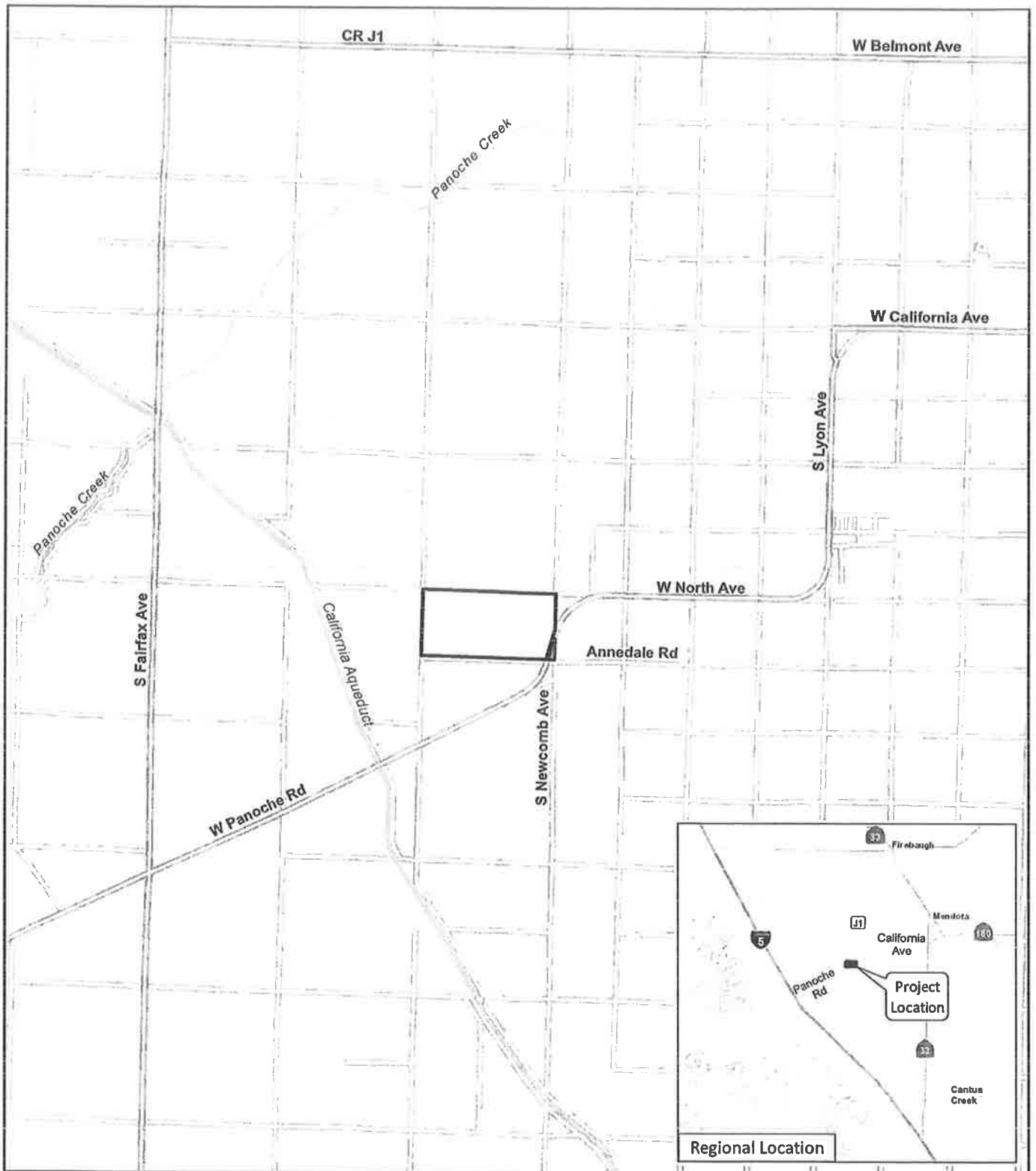


FIGURE 1

LSA

LEGEND

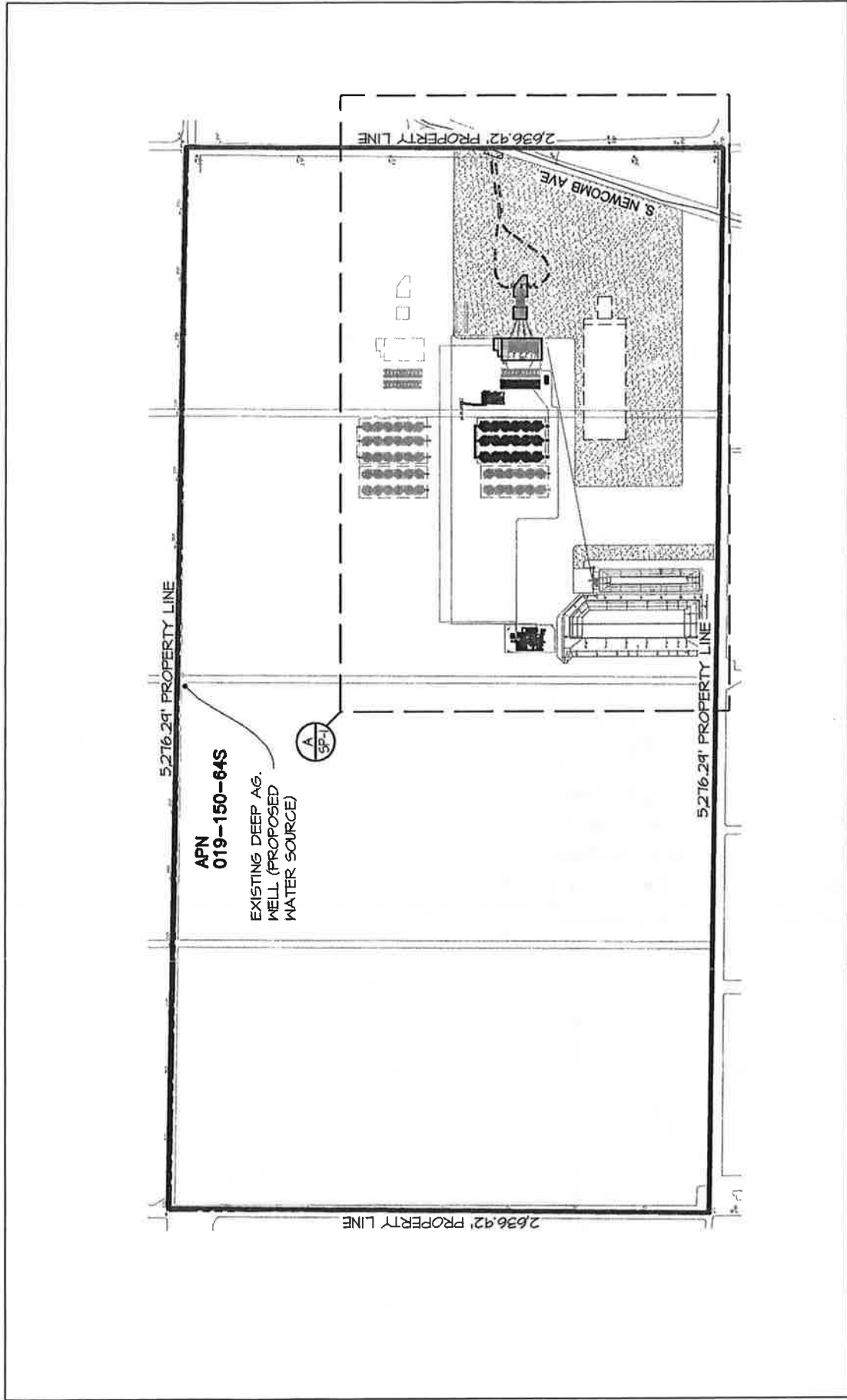
 Project Site



SOURCE: Esri World Street Map.

\\AzCorp04\PTR\images\OPA2101\GIS\Maps\Project Description\Figure 1_Regional and Local Location.mxd (4/18/2022)

S. Stamoules, Inc. Pistachio Processing Facility Project
Fresno County, California
Notice of Preparation
Regional and Local Location



LSA



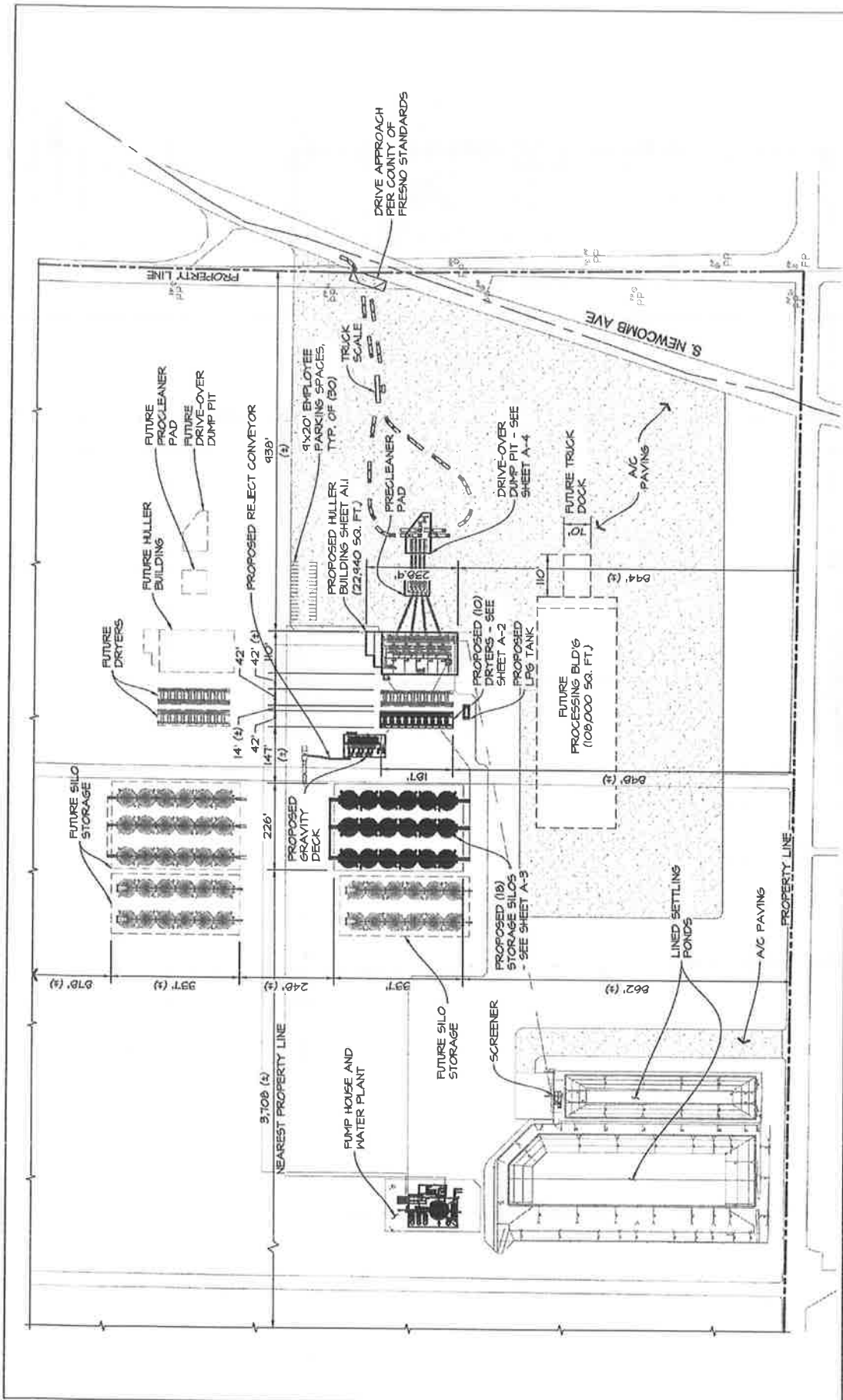
NOT TO SCALE

SOURCE: Engel & Company, 2020

FREProjects:\CFF2201 OPA Pistachio\PRODUCTS\Project Description\Figures\Figure 2.ai (4/19/2022)

FIGURE 2

S. Stamoules, Inc. Pistachio Processing Facility Project
Fresno County, California
Notice of Preparation
Project Site Plan



LSA



NOT TO SCALE

SOURCE: Engel & Company, 2020

F:\Projects\CF2201 OPA Pistachio\PRODUCTS\Project Description\Figures\Figure 3.ai (4/19/2022)

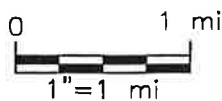
FIGURE 3

S. Stamoules, Inc. Pistachio Processing Facility Project
 Fresno County, California
 Notice of Preparation
 Partial Site Plan



EXPLANATION:

LAA - LAND APPLICATION AREA
 AC - ACRES



(SCALE AND LOCATIONS APPROXIMATE)

(SOURCE: Google Earth Pro Image September 2020, ©2021 Google™)

Figure 1. Site Location Map

PROJECT NUMBER: 2021210059	S. Stamoules Pistachio Processing Facility Conditional Use Permit Application: Projected Land Application Area
DATE: 5 '24 '2021	
DWG NO: 2020210059 F1.DWG	South Valley Engineers S. Newcomb Ave. APN 019-150-64S Mendota, California 93640
DWG BY: PROJECT MANAGER 6NSG 10MSS	
REVISED:	

VALLEY **SCIENCE AND ENGI**