California Environmental Quality Act

Draft Initial Study/Mitigated Negative Declaration

Riverdale High School Facility Improvements

State Clearinghouse (SCH) Number: 2025010373

Lead Agency and Project Sponsor

Riverdale Joint Unified School District

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Executive Summary

The Riverdale Joint Unified School District (District) proposes to construct and operate new school facilities on 21.5 acres west and north of the intersection of S. Hazel Avenue and Stathem Street in the unincorporated community of Riverdale, Fresno County, California (APN: 053-130-12T and 053-130-82T). The proposed project would be constructed in three phases.

In Phase 1 the existing football/soccer stadium and track would be remodeled, consisting of approximately 7.34 acres. This would include be demolition of the existing stadium, regrading and planting with turf grass, a rubber track, throwing and jumping track facilities, lighting, bleachers, perimeter fencing, landscaping. A new 1,650 sq. ft. building would be constructed to house a training room, snack bar, ticket window, and toilet facilities. New and replaced utilities would be connected to existing campus mains along Hazel Avenue. The adjacent existing parking lot (1.56 acres) at the northwest of the campus would be reconstructed. Soil removed from the existing stadium berms would be stockpiled to be used as fill for the following Phase 2.

Phase 2 would construct approximately 5.87 acres of new multi-use athletics fields at the north of the campus, including new irrigation systems and twelve (12) 30-ft tall 'practice' light poles. The existing campus Ag Barn and surrounding campus ag education facilities would be demolished and cleared, as well as commercial agricultural land owned and leased out by the District. Road improvements would be made to Hazel Avenue, starting at the intersection of Stathem Street and S. Hazel Avenue. Road improvements would extend north for approximately 710 feet, including approximately 62 roadside parking stalls and new sidewalk on the east side of S. Hazel Avenue. Approximately 660 feet of overhead electrical utilities along the north side of the parking lot to the north side of the new stadium would be removed and replaced with underground electrical lines. A new electrical transformer and irrigation control station would be installed at the west or southwest corner of the parking lot, or the southwest corner of the existing practice baseball/softball fields. The capacity of the existing stormwater basin (7.11 acre-feet) would be expanded by about 5.31 acre-feet to provide a total storage of about 12.42 acre-feet.

Phase 3 would construct an approximately 18,470 sq. ft Agricultural Education Barn on an approximately 3.34-acre facility surrounded by gravel access roads, pastures, orchards, chicken hutches, and a shade structure. Utilities for electrical, water, and sewer would be connected to existing mains under Hazel Avenue. This facility would be constructed north of the proposed multi-use athletics fields. Parking, sidewalk, and landscaping improvements would also be made to the newly extended portion of Hazel Avenue. This facility would be constructed by clearing existing farmland owned by the District.

The conclusions of the Initial Study are as follows:

1. The Initial Study identified potentially significant environmental effects of the proposed project in the following subject areas: biological resources, cultural resources, geological resources, greenhouse gases, utilities, tribal cultural resources, and mandatory findings of significance. The District can avoid or reduce these impacts to an insignificant level by incorporating the mitigation measures listed in Table 1 below.
2. The proposed project would have a less than significant impact or no impact on many of the environmental resources and conditions evaluated in the Initial Study. The Initial Study explains why there would be no impacts, or why the impacts would be less than significant.
3. Based on items 1 and 2, above, the District should adopt a Mitigated Negative Declaration for the proposed project.

Table 1.
Summary Table of Mitigation Measures

BR-1	**Mitigation Measure BR-1 Nesting Bird Avoidance and Minimization.** Construction activity should be limited to the non-nesting bird season. The nesting bird season is between February 1st and August 31st. If construction should occur during the nesting bird season, then a pre-construction nesting bird survey should be conducted to identify any active bird nests within the project area. The survey area should include a buffer area approximately 250' from potential nest sites (e.g., trees and light poles). If an active nest is observed, then one or more of the following actions shall occur: • A 250' buffer around an active bird nest protected by the MBTA should be implemented. • A 500' buffer should be implemented around an active raptor nest (e.g., Red-Tailed Hawk, Red-Shouldered Hawk, etc.). • A 0.5-mile buffer around an active Swainson's Hawk nest. Additionally, a qualified biologist should be present to monitor the Swainson's Hawk nest to determine if construction activity is negatively affecting nesting behavior. • If a buffer is not feasible, then a qualified biologist should regularly monitor active nests and shall stop construction if construction activity is negatively affecting the active bird nest. A buffer may still be required for an active Swainson's Hawk nest. • A hybrid approach may be used where a buffer is set around an active bird nest until construction is required near the nest. At this point, a qualified biologist may start to monitor the bird nest. • No bird nests shall be destroyed during the nesting bird season or when the nest is active.
BR-2	**Mitigation Measure BR-2 Burrowing Owl Surveys.** Prior to the initiation of ground-disturbing activities, a qualified biologist shall conduct protocol-level burrowing owl surveys in accordance with CDFW's *Staff Report on Burrowing Owl Mitigation* (California Department of Fish and Game, 2012). Surveys will be conducted at appropriate seasonal windows to assess presence of burrowing owl within suitable habitat. The surveys will cover the construction footprint of the upcoming phase to be initiated and a 150-meter (approximately 500-foot) buffer zone around the perimeter of the footprint.
BR-3	**Mitigation Measure BR-3. Burrowing Owl Avoidance and Minimization.** If burrowing owls are detected during pre-construction surveys, then burrowing owl avoidance and minimization measures following CDFW's *Staff Report on Burrowing Owl Mitigation* shall be implemented. During the nesting season (February 1 through August 31) occupied burrowing owl burrows shall be avoided and will not be disturbed unless it is verified that either the birds have not begun egg-laying and incubation or the juveniles from the occupied burrows are foraging independently and are capable of independent survival without further parental care. If burrowing owl avoidance is not feasible, the project applicant shall implement additional mitigation measures, such as passive relocation, in consultation with CDFW, to minimize potential impacts to the species.

BR-4	**Mitigation Measure BR-4 General Wildlife Impact Mitigation.** Excavation work deeper than 2' should include a means of escape for wildlife, such as using a plywood ramp or a similar structure. Trapped animals should be allowed to leave on their own; however, if the animal is not able to, the California Department of Fish and Wildlife shall be contacted for assistance with removing the animal. All trash is disposed of and stored properly to avoid attracting animals that may pass through the site.
CULT-1	**Mitigation Measure CULT-1 Full-Time Archaeological Monitoring.** Due to the known sensitivity of the Project area, a qualified archaeologist shall monitor ground-disturbing activities during all phases of the proposed Project. The archaeologist will coordinate with the Tribal monitor, construction contractor, and RJUSD representatives to determine the grading schedule, sensitivity training needs, and procedures to follow if inadvertent finds are discovered. Monitoring shall continue until all ground-disturbing activities for each phase are complete or as otherwise agreed upon in writing by the project archaeologist, Tribal representative(s) (assumed to be the Santa Rosa Rancheria Tachi Yokut Tribe), and RJUSD. RJUSD shall contract with a qualified firm to ensure an archaeological monitor will be on site during all ground-disturbing activities in areas of high concern. These activities include: • Excavation of the existing soil berm of the stadium; • Trenching or excavation for utilities deeper than 1.5 foot below the existing ground surface in all Project areas; • Excavation of the stormwater basin; • Initial earthwork for the multi-use athletics fields in undeveloped farmland, until soil import activities have concluded; and • All earthwork for the agricultural barn in undeveloped farmland. The archaeological monitor shall have the authority to temporarily halt or redirect construction activities if potentially significant cultural resources are encountered. If such resources are identified, all earthwork in the vicinity shall cease, and Mitigation Measures (MM) CULT-5 and TC-3 shall be implemented.
CULT-2	**Mitigation Measure CULT-2 Part-Time Archaeological Monitoring.** In addition to CULT-1, areas of moderate concern shall also be monitored by a qualified archaeologist who, in coordination with the Tribal monitor, will conduct periodic spot-check monitoring of earthwork activities including: • Grading for the redevelopment of the stadium; • Grading for the redevelopment of the parking lot; • Grading for the redevelopment of South Hazel Avenue; and • Grading of the multi-use athletics fields, after soil import has concluded. The frequency and schedule of spot-check monitoring shall be determined in consultation with the Tribal monitor/representative prior to the start of construction, based on the sensitivity of the area and the scope of ground disturbance. The archaeological monitor shall have the authority to

	temporarily halt or redirect construction activities if potentially significant cultural resources are encountered. If any potentially significant cultural resources are discovered, all work in the vicinity area shall cease, and MM CULT-5 and TC-3 shall be implemented.
CULT-3	**Mitigation Measure CULT-3 Worker Environmental Awareness Program.** A Worker Environmental Awareness Program shall be conducted prior to any ground-disturbing activities. The purpose of the training is to educate the construction crew and establish protocols for treating unanticipated cultural resource finds. The project archaeologist shall provide cultural resources awareness training to all construction personnel. This training will include descriptions of the types of resources that may be found in the Project area, the protocols to be used in the event of an unanticipated discovery, provide contact information for the archaeological firm and the monitoring Tribe, and identify the laws protecting significant archaeological and historical resources. The archaeological firm will coordinate with the monitoring Tribe to include any additional concerns in the workers environmental training program presentation to temporarily provide information to construction personnel should a representative not be immediately available to provide the Tribal training in MM TC-3. Such concerns could include Assembly Bill 52 (AB 52) requirements, laws and regulations, respect for Tribal requests, the ability to temporarily redirect construction traffic by both cultural monitors, and any other concerns as applicable. The training may be provided via a pre-recorded video or given on site by the archaeologist as needed and will be conducted in coordination with the Tribal training required in MM TC-5, and attendance shall be documented by sign-in sheets or equivalent verification. Documentation shall be submitted to the District prior to the commencement of ground disturbance and included in reports prepared pursuant to MM CULT-6. For the purposes of this measure, “construction personnel” includes contractors, subcontractors, equipment operators, laborers, and supervisory staff engaged in or overseeing ground-disturbing activities. The term does not include delivery drivers, vendors, furniture installers, or other workers whose on-site presence is limited to short-term tasks outside of ground-disturbance areas. This training requirement applies only during the period in which ground-disturbing activities occur. Once all earthwork is complete, additional trainings for new personnel is not required.
CULT-4	**Mitigation Measure CULT-4 Monitoring Plan.** Archaeological and Tribal monitoring methods and procedures shall be documented in a Cultural Resource Monitoring Plan (CRMP). At least 30 days prior to construction of the Project’s first phase, the project archaeologist, in coordination with the Tribal monitor, will begin preparing the CRMP. The CRMP shall be approved by the RJUSD at least 5 days prior to the start of construction and a final copy maintained on site throughout construction activities. The CRMP will cover all phases of Project development and, at a minimum, outline the project schedule, define the areas to monitor, identify the roles of the archaeologist and the Tribal monitor/representative, provide contact information, review safety procedures, and discuss the procedures to follow in the event of a cultural resource discovery.
CULT-5	**Mitigation Measure CULT-5 Unanticipated Discoveries.** If any cultural materials are identified, the archaeologist should temporarily halt the ground disturbance within 100 feet of the find(s) and

	notify the Tribal monitor and on-site supervisor. The archaeologist, in coordination with the Tribal monitor, shall assess the find to determine if materials are isolated or part of a larger archaeological deposit. If an archaeological site is identified, the resource should be evaluated for significance under CEQA criteria and further treatment measures may be required. The evaluation shall consider the resource's eligibility and its potential as a TCR under PRC Section 21074. If the resource(s) is determined to be a TCR, procedures outlined in the CRMP and MM TC-3 will be followed. Should the discovery be identified as human remains, procedures outlined in California Health and Safety Code 7050.5 will be followed.
CULT-6	**Mitigation Measure CULT-6 Monitoring Report.** A monitoring report shall be prepared by the project archaeologist within 60 days of completion of all construction monitoring for each phase of Project development. The reports will, at a minimum, describe the methods of monitoring, discuss any cultural resources discovered and how they were managed, include an evaluation of eligibility for the discovered resources, if applicable; provide a list of involved personnel; and provide any additional recommendations if appropriate. Once each report has been finalized, the archaeologist will prepare final digital submissions for RJUSD and the monitoring Tribe. The archaeological firm will also submit digital copies to the SSJVIC.
GEO-1	**Mitigation Measure GEO-1 Inadvertent Paleontological Resource Discovery.** If paleontological resources are inadvertently discovered during ground-disturbing activities, all work within 50 feet of the discovery shall be halted, and the construction supervisor shall immediately notify the lead agency and retain a qualified paleontologist who meets the standards of the Society of Vertebrate Paleontology (SVP 2010) to evaluate the find. The paleontologist shall assess the significance of the discovered resource in accordance with CEQA Guidelines Section 15064.5 and SVP guidelines. If the find is determined to be a significant paleontological resource, the paleontologist shall develop and implement a treatment plan in consultation with the lead agency. The treatment plan may include, but is not limited to, recovery and curation of the resource at an accredited repository, documentation of the find, and preparation of a report summarizing the methods and results of the recovery. Ground-disturbing activities in the vicinity of the discovery shall not resume until the paleontologist determines that the site has been appropriately managed and cleared for continued work.
GHG-1	**Mitigation Measure GHG-1 Natural Gas Prohibition.** Building mechanical equipment and appliances shall be electrically powered. The installation of natural-gas service/infrastructure shall be prohibited.
TC-1	**Mitigation Measure TC-1 Full-Time Earthwork Tribal Cultural Resource Monitoring.** To avoid potential impacts to TCRs, a qualified Tribal monitor from the SRR shall be retained by RJUSD. The Tribal monitor shall be present to observe all ground-disturbing activities in areas of high concern of all phases, including, but not limited to, grading, excavation, trenching, and augering. If a Tribal monitor is temporarily unavailable, earthwork in high-potential areas shall not proceed unless: (a) a Tribal monitor has conducted a pre-activity inspection (spot check) and cleared the work area, or

	(b) the qualified archaeological monitor required by MM CULT-1 is present on site. The requirement for Tribal monitoring shall be noted on all construction documents for all phases and verified by RJUSD prior to the commencement of ground-disturbing activities for all phases. Monitoring shall continue until all ground-disturbing activities for each phase are complete or as otherwise agreed upon in writing by the Tribal representative(s), project archaeologist, and RJUSD. The areas of high concern include: • Excavation of the existing soil berm of the stadium; • Trenching or excavating for utilities deeper than 1.5 foot below the existing ground surface in all Project areas; • Excavation of the stormwater basin; • Initial earthwork for the multi-use athletics fields in undeveloped farmland, until soil import activities have concluded; and • All earthwork for the agricultural barn in undeveloped farmland. The Tribal monitor shall have the authority to temporarily halt or redirect construction activities if potentially significant TCRs are encountered. If such resources are identified, all earthwork in the vicinity shall cease, and MM TC-3 and CULT-5 shall be implemented. All phases of earthwork monitoring shall be documented in a CRMP developed in coordination with the SRR and the qualified project archaeologist as required by CULT-4, and maintained on site. Monitoring documentation shall be submitted to the RJUSD upon completion of ground-disturbing activities for each phase (MM CULT-6).
TC-2	**Mitigation Measure TC-2 Spot-Check Earthwork Tribal Cultural Resources Monitoring.** In addition to TC-1, areas of moderate concern shall also be monitored by a retained SRR monitor who, in coordination with the archaeologist, will conduct periodic spot-check monitoring of earthwork activities including: • Grading for the redevelopment of the stadium; • Grading for the redevelopment of the parking lot; • Grading for the redevelopment of South Hazel Avenue; and • Grading of the multi-use athletics fields, after soil import has concluded. The frequency and schedule of spot-check monitoring shall be determined in consultation with the project archaeologist prior to the start of construction, based on the sensitivity of the area and the scope of ground disturbance. The Tribal monitor shall have the authority to increase the frequency of monitoring if site conditions indicate a higher potential for encountering TCRs. If any potentially significant TCR are discovered, all work in the vicinity area shall cease and MM CULT-5 and TC-3 shall be implemented.
TC-3	**Mitigation Measure TC-3 Unanticipated Discovery of Tribal Cultural Resources.** If TCRs including human remains, cultural materials, features, or artifacts, are discovered during ground-disturbing activities, all work within 100 feet of the discovery shall immediately cease. The construction contractor shall immediately notify the construction manager, the Tribal monitor (as identified in TC-1 and TC-2), and the qualified archaeologist as required in CULT-1.

	The significance of the discovery shall be evaluated by the qualified archaeologist in consultation with the Tribal monitor. The evaluation shall consider the resource's eligibility for listing in the CRHR and its potential as a TCR under PRC Section 21074. If the resource is determined to be a TCR or otherwise significant under CEQA, the construction manager shall implement a treatment plan developed in consultation with the SRR Tribal representative(s), the RJUSD, and the qualified archaeologist. The treatment plan may include preservation in place, if feasible, or respectful recovery and reburial in accordance with Tribal protocols. Construction activities may resume in the affected area only after the RJUSD, in consultation with the archaeologist and Tribal representative(s), determines that appropriate mitigation has been implemented.
TC-4	**Mitigation Measure TC-4 Tribal Cultural Resources Curation Agreement.** At least 30 days prior to the commencement of any construction activities, the RJUSD shall execute a Curation and Treatment Agreement with the SRR, a California Native American tribe traditionally and culturally affiliated with the Project area. The agreement shall establish protocols for the respectful treatment, temporary storage, and long-term curation or reburial of any TCRs that may be collected during ground-disturbing or other construction activities where preservation in place is determined not to be feasible pursuant to MM TC-3. The agreement shall include, but not be limited to: • Recognizing SRR's role as the appropriate entity for determining the treatment and disposition of recovered TCRs; • Allowing SRR to take possession of recovered materials for reburial or curation in accordance with their customs, protocols, and applicable laws; and • Providing culturally appropriate documentation that respects the confidentiality and sensitivity of TCRs, consistent with PRC Sections 21083.2 and 21084.3. Evidence of the executed agreement shall be documented by RJUSD prior to any ground disturbance. Final disposition of any TCRs shall occur in accordance with the terms of the agreement and be documented in the final report for the appropriate phase per MM CULT-6.
TC-5	**Mitigation Measure TC-5 Pre-Construction Tribal Cultural Awareness Training.** Prior to any ground-disturbing activities of each phase, RJUSD, in coordination with the Construction Manager, the SRR, and project archaeologist, shall ensure that all construction personnel who are involved in supervising or regularly working within areas of ground disturbance attend a Tribal Cultural Awareness Training conducted by a representative of the SRR. Training shall be conducted in person before ground-disturbing activities commence. After the initial training and commencement of ground-disturbing activities, any new on-site personnel, either from a current or new construction company, who regularly works within areas of ground disturbance, are also required to attend an in-person Tribal Cultural Awareness Training. Attendance for all Tribal Trainings shall be documented via sign-in sheet, and a copy shall be submitted to RJUSD and the archaeological consultant to include in the report(s) per MM CULT-6. The District will be responsible for all construction personnel taking both the archaeological and

	Tribal awareness trainings. For the purposes of this measure, "construction personnel" includes contractors, subcontractors, equipment operators, laborers, and supervisory staff engaged in or overseeing ground-disturbing activities. The term does not include delivery drivers, vendors, furniture installers, or other workers whose on-site presence is limited to short-term tasks outside of ground-disturbance areas. The Tribal Cultural Awareness Training shall inform on-site personnel, at a minimum, of the following: • Respect for TCRs; This Project area may contain TCRs, which are places or objects of cultural and spiritual importance to the SRR. Protecting these resources is required by law and is a condition of the Project. • Examples of TCRs, which include the following but are not limited to, stone tools, flakes from tool-making, bone, shell, pottery fragments, hearths, dark soil with organic material, viewsheds, and ancestral remains. • Legal protections addressing TCRs and their protection under CEQA and Public Resources Code Sections 21083.2 and 21084.3. This must also include that it is illegal to remove, damage, or ignore TCRs. • Discovery procedures including: (1) If you see anything that looks unusual, stop work immediately in that area and notify the supervisor in charge. (2) The Project Archaeologist and Tribal Monitor will determine the next steps. (3) Do not touch, move, or collect any potential cultural materials. • The role of the Tribal Monitor and their presence on site. The SRR monitor represents the Tribe and has authority to stop work if a resource is found. Their instructions must be respectfully followed. In the event that a SRR representative is not on site to provide the Training, the new personnel must take the archaeological workers environmental training program training in MM CULT-3 and be scheduled to take the SRR Training within 5 days of their first day of work on site. This training requirement applies only during the period in which ground-disturbing activities occur. Once all earthwork is complete, additional trainings for new personnel are not required.

A. Project Background Information

1. Project Title, Lead Agency, and Lead Agency Contact Information

- Project Title: Riverdale High School Facilities Improvements
- Lead Agency: Riverdale Joint Unified School District
- Contact: Jeff Percell
  Superintendent
  PO Box 1058
  Riverdale, CA 93656
  Telephone: (559) 867-8200
  Email: jpercell@rjusd.org

2. Project Location

The project site is located at 3086 West Mt. Whitney Avenue, Riverdale, California, on 21.5 acres north and east of the intersection of Mt. Whitney Avenue and S. Hazel Avenue in the unincorporated community of Riverdale, Fresno County, California. The project site location and site plans are displayed in Figures 1, 2, 3, and 4.

Table 2
Project Location

City	Riverdale, an unincorporated community
County	Fresno
Zip Code	93656
Assessor's Parcel Number	APN: 053-130-12T and 053-130-82T
Nearest Existing Major Cross Streets	Mt. Whitney and S. Hazel Avenue
Elevation	Approximately 223 ft. AMSL
USGS Map	Riverdale
Section, Township & Range	Section 24, Township 17S, Range 19E
Latitude/Longitude	36° 26' 2.913" N, -119° 51' 17.954" W

Figure 1: Location Map

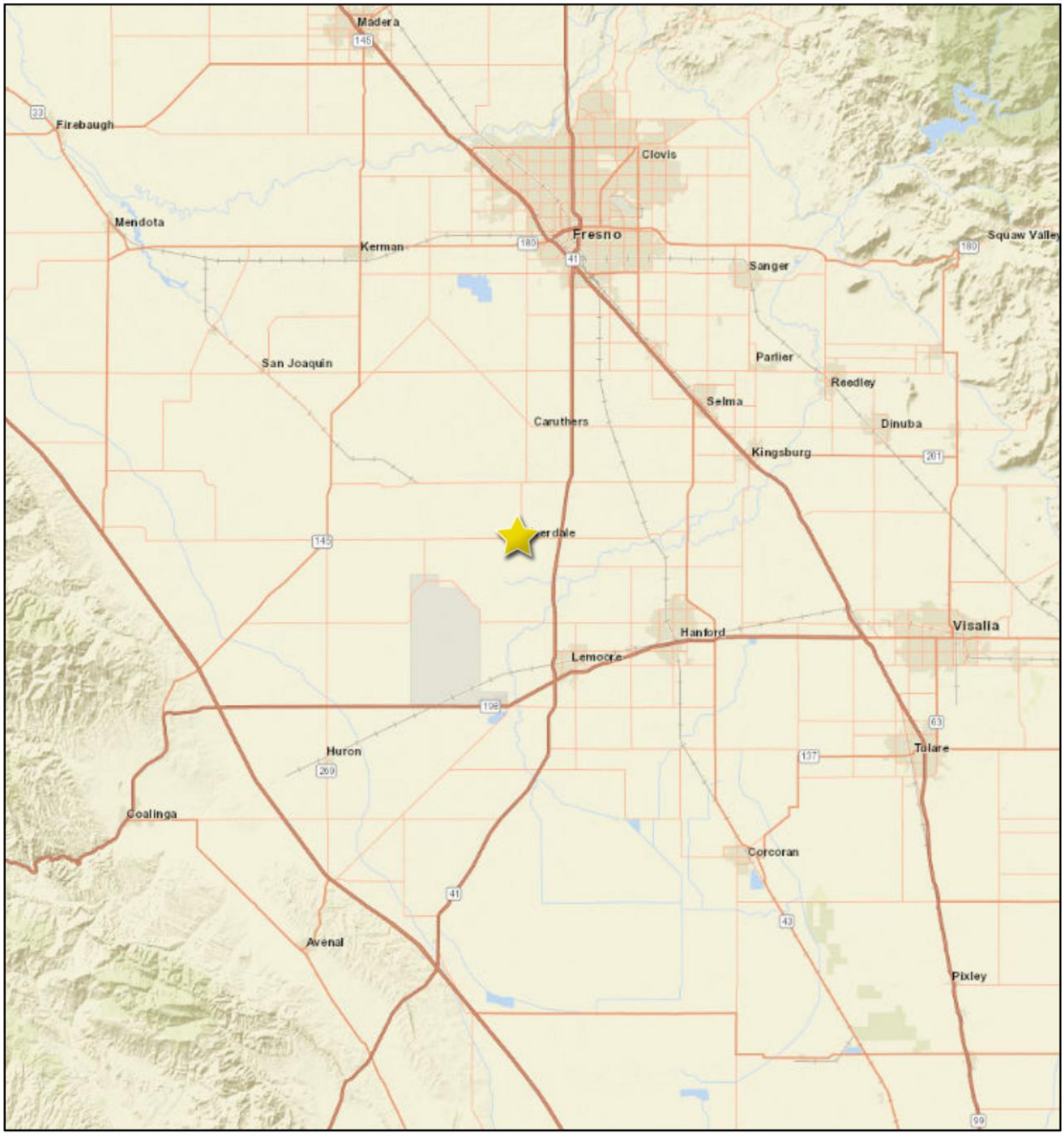


Figure 2: Vicinity Map

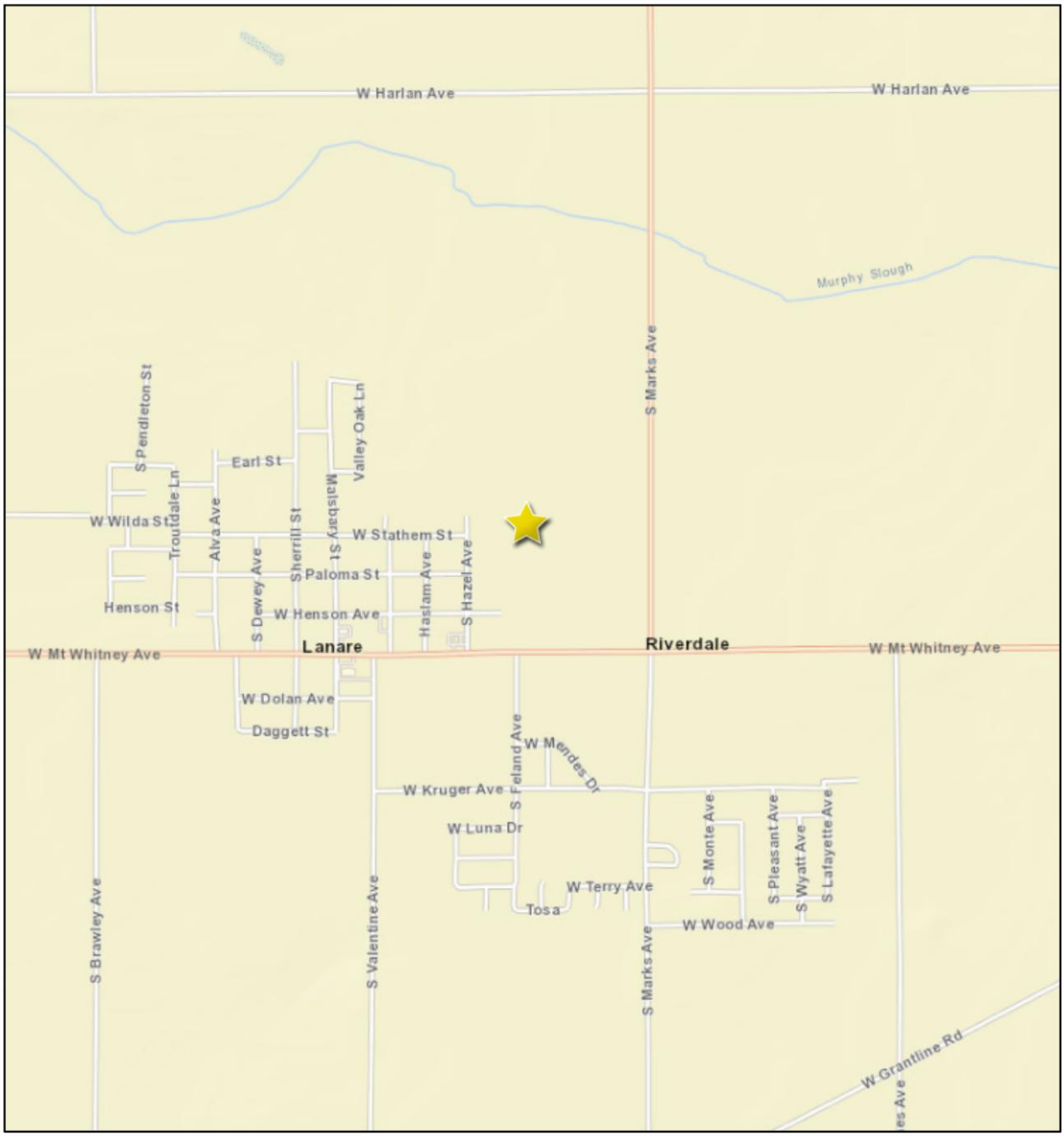


Figure 3: Proposed Project Phases

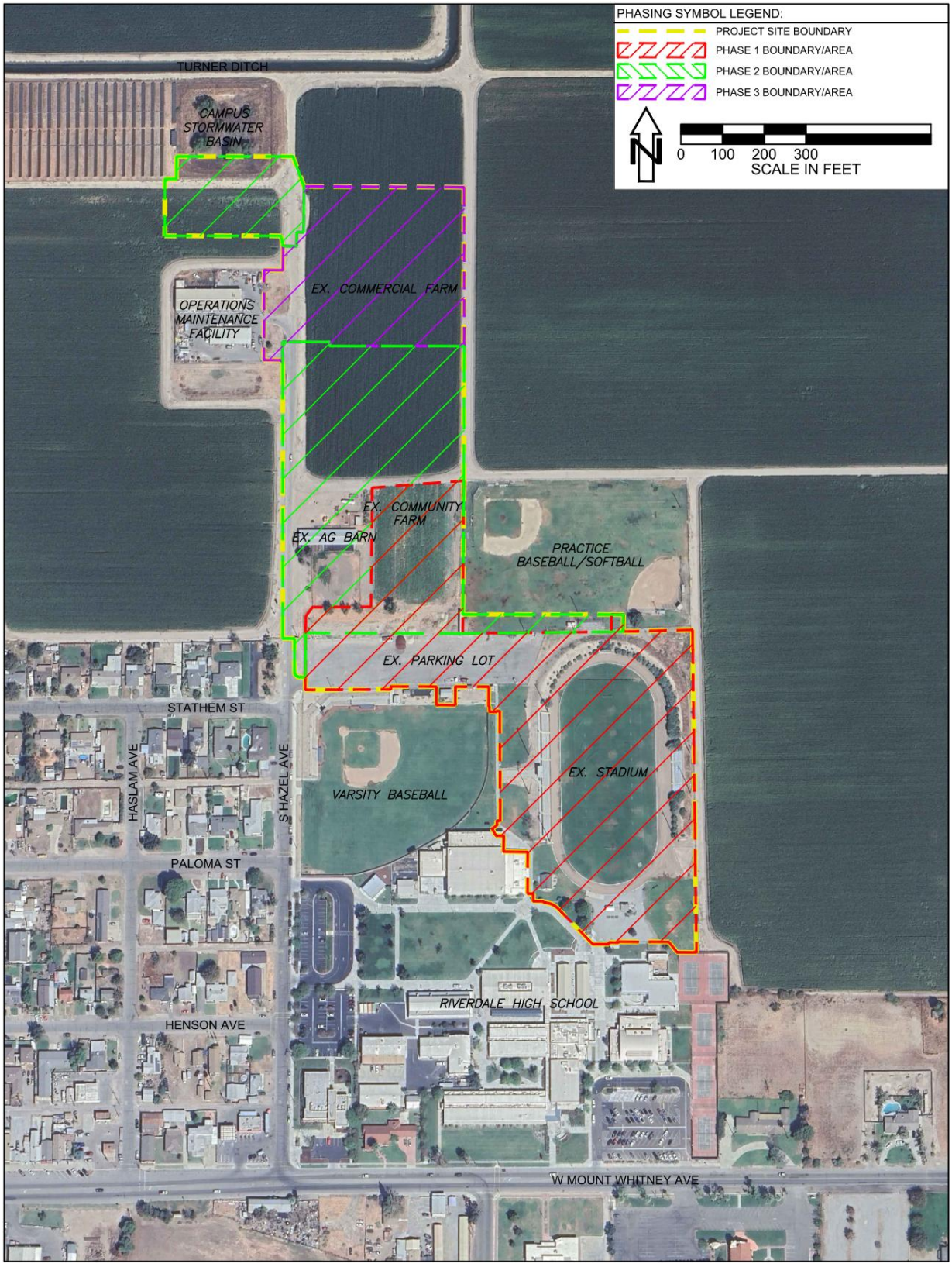
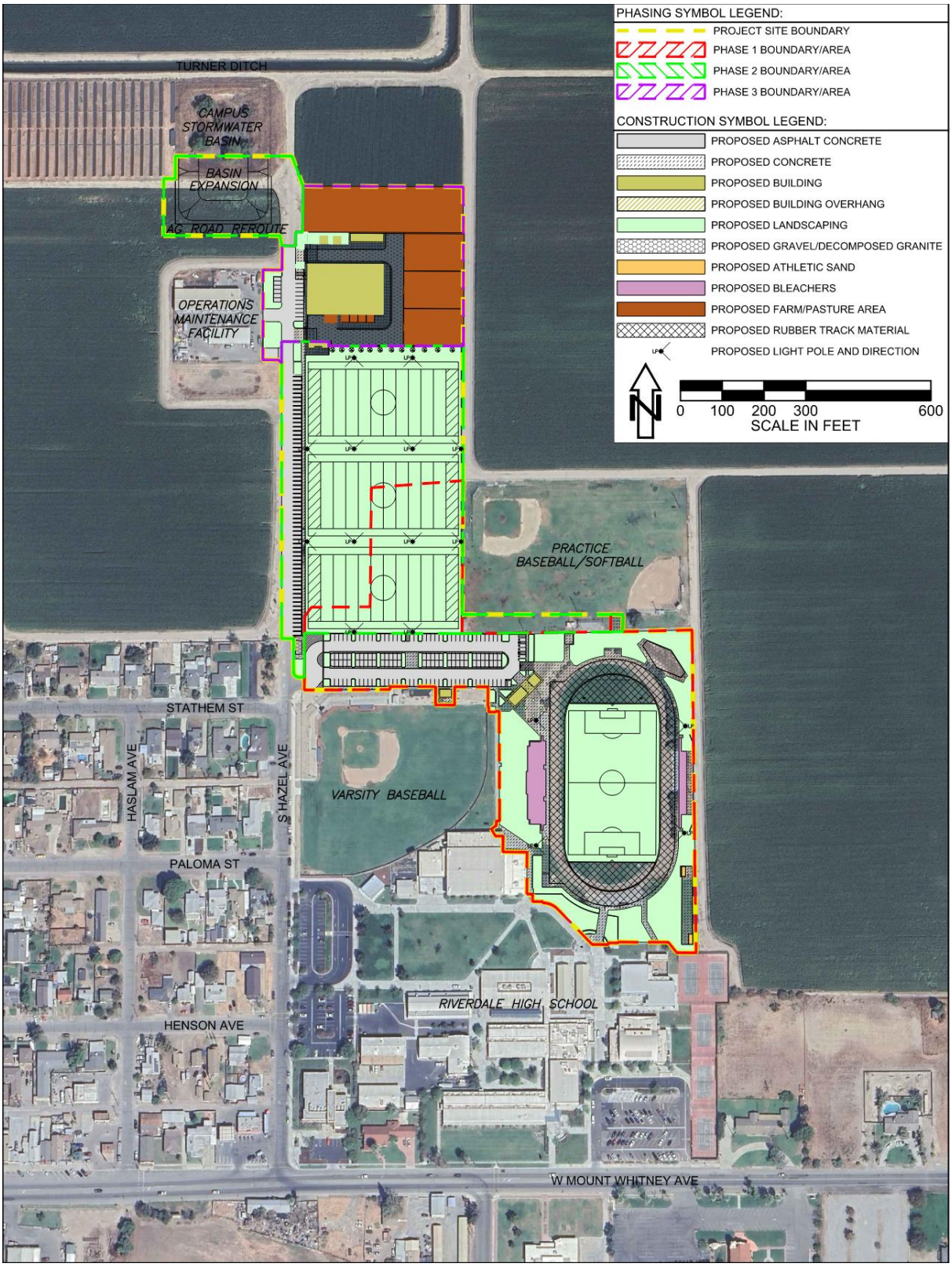


Figure 4: Proposed Project Site Map



3. Project Description

The project site is located on 21.5 acres northeast of the intersection of W. Mt. Whitney Avenue and S. Hazel Avenue in the Census-designated community of Riverdale, CA, in Fresno County (County), California (APN: 053-130-12T, and 053-130-82T). The Project Location and Vicinity can be seen in Figures 1 and 2.

The Riverdale Joint Unified School District (District) proposes renovating the football/soccer and track stadium, reconstructing a parking lot, constructing new community multi-use athletic fields (aka "community fields"), reconstructing the Agriculture Barn Education Facility (Ag Barn), improving a section of S. Hazel Avenue, and expanding an existing campus stormwater basin. Work would be completed in three phases. The exact division of work to be completed in each phase is unknown and would depend on available funding and construction costs. The most likely division and phasing of work as described below is analyzed in this initial study.

Phase 1 would renovate the existing high school football/soccer and track stadium and reconstruct a parking lot. Phase 2 would construct three new multi-use athletic fields, demolish the existing Ag Barn building, expand the campus stormwater basin, and rebuild a portion of Hazel Avenue, including sidewalk and roadside parking stalls. Phase 3 would construct a new Agriculture Education Barn facility and finalize the reconstruction of S. Hazel Avenue to the proposed Ag Barn. Details of the project site and the proposed project are shown in Figures 3 and 4, and are described as follows:

Phase 1 – Football/Soccer Stadium and Track Remodel

The Phase 1 site is on approximately 10.98 acres. The remodeled football/soccer stadium and track would comprise approximately 7.34 acres, parking lot reconstruction would comprise 1.56 acres, and a staging area/soil fill area would comprise 2.08 acres.

Stadium remodeling would include removing the existing soil berms and trees surrounding the track, demolition of stadium seats (with approximately 2,000 home and 500 visitor bench seats), an existing snack bar building, and an existing pump house building. An inactive water well in the pump house would be destroyed, in accordance with County of Fresno Department of Public Health standards. Stadium improvements would include new aluminum stadium bleacher stands, regrading and planting of the football/soccer field, a 9-lane rubber-surface 400-meter track, and field facilities (including long jump, triple jump, high jump, shot put, and discus), stadium perimeter fencing, and landscaping improvements. A new 1,650 sq. ft. building that houses a training room, snack bar, ticket window, and toilet facilities would be constructed. Eight (8) existing 70-foot-tall stadium lights would be removed and replaced with four (4) 90-foot-tall stadium lights.

The existing north campus parking lot would be demolished and reconstructed. The design would include five (5) accessible parking stalls, new valley gutters and drain inlets, up to twelve (12) 15 to 20-foot-tall parking lot light poles, and tree planters. An existing bathroom immediately south of the parking lot would be demolished and replaced with a new 520 sq. ft. bathroom building. New utilities, including electrical, sewer, water, storm drain, and irrigation for the stadium and parking lot, would be installed and connected to the existing campus utility systems.

The contractor would clear farmland located north of the existing parking lot for use as a staging area and temporarily store soil from the existing soil berms surrounding the stadium. This soil would be used as fill for the proposed Phase 2 multi-use athletics fields.

Phase 2 – Multi-Use Community Athletic Fields

The Phase 2 site is on approximately 8.76 acres. Phase 2 site work includes approximately 5.87 acres of new multi-use athletic fields, approximately 1.08 acres for initial improvements to reconstruct a portion of Hazel Avenue, approximately 1.42 acres for expansion of the campus stormwater basin and rerouting of an existing dirt farm road, and approximately 0.38 acres to underground existing overhead electrical lines. These site areas are located north of the existing parking lot and west of the existing baseball/softball practice fields.

The existing Ag Barn (5,070 sq. ft.) and surrounding area would be demolished and cleared to construct the new multi-use fields. Further north, approximately 2.65 acres of agricultural land (owned and leased out by the District), currently planted in wheat, would be cleared. Soil removed from the Phase 1 stadium berms, and from off-site import would be used as fill for the multi-use athletics field area to raise the proposed ground elevation approximately 0.5 to 2 feet above the existing ground surface level. The multi-use athletics fields would be planted with turf grass and include twelve (12) 30-ft tall pole 'practice' lights, electrical systems, irrigation systems, and a tree row at the northern end of the new fields. New connections for irrigation water would be constructed and connected to the existing water line under S. Hazel Avenue or to water pipelines constructed during Phase 1. Approximately 685 feet of new electrical conduit would be added from the intersection of Stathem Street and S. Hazel Avenue and extend north to power the multi-use fields. A community toilet building (620 sq. ft.) would be constructed at the northwest corner of the new multi-use athletics fields and connected to the existing sewer main under Hazel Avenue. The toilet building would serve the community fields and the Phase 3 Ag Barn.

Phase 2 would also include road improvements to Hazel Avenue and a new parking lot on 1.08 acres of land owned by the District, starting at the intersection of Stathem Street and S. Hazel Avenue, extending approximately 710 feet north to the north extent of the proposed multi-use athletics fields. The new parking lot with 62 parking stalls and stormwater drain inlets is planned on the east side of S. Hazel Avenue to serve the multi-use athletics fields. These parking stalls would be oversized for large vehicle parking, 10 feet wide x 20 feet deep. Approximately 710 feet of new sidewalk would be constructed on the east side of S. Hazel Avenue. This section of S. Hazel Avenue would likely not receive road finishes, as the road would be damaged by traffic during the construction of the Phase 3 Ag Barn. The area of S. Hazel Avenue proposed to be constructed during Phase 2 is anticipated to be finished with a final seal coat at the end of Phase 3 after the Ag Barn has been constructed.

Approximately 660 feet of overhead electrical utilities spanning west to east from S. Hazel Avenue along the north side of the parking lot to the north side of the stadium would be removed and replaced with underground electrical lines. A new electrical transformer and irrigation control station would be installed at the west or southwest corner of the parking lot, or the southwest corner of the existing practice baseball/softball fields that are located immediately north of the stadium.

At the start of Phase 2, the existing stormwater basin would be excavated to expand its capacity for additional stormwater runoff; a dirt farm road would be rerouted around a new fence south of the basin. The existing basin with approximately 7.11 acre-feet of storage volume would be expanded by approximately 5.31 acre-feet, yielding a total of approximately 12.42 acre-feet of available storage. This design would provide storage adequate to contain stormwater runoff generated from the project and the greater existing Riverdale High School campus up to a 100-year 10-day storm event. To accomplish this, approximately 5.31 acre-feet (231,300 cu-ft) of soil would be excavated and used as fill for the multi-use athletics fields.

Phase 3 – New Ag Barn Facility

Phase 3 is approximately a 4.94-acre site. Phase 3 would construct a new Ag Barn Facility (3.34-acres) located across S. Hazel Avenue from the existing Maintenance Operations Facility, 0.52 acres of road, parking, sidewalk,

and landscaping improvements to S. Hazel Avenue immediately west of the Ag Barn, and complete finishing work on S. Hazel paved during Phase 2.

As planned, the Ag Barn building is approximately 18,470 sq. ft. and would be used for housing animals for educational purposes. The size of the Ag Barn building may be reduced to align with available funding. The surrounding facility would include about 12 parking stalls, concrete sidewalks, gravel access roads, and landscaped areas. Based on available funds, chicken hutches, a shade structure, orchards, and a pasture field may be constructed. Approximately 3.25 acres of land currently planted as wheat fields (owned and leased by the District) would be cleared to construct the new Ag Barn Facility. Sewer, water, electrical, and stormwater utility connections would be made to mains located under S. Hazel Avenue.

4. Project Design Standards

State of California

The primary agency responsible for project design standards is the Division of State Architects (DSA). DSA requires compliance with the 2022 California Building Standards Code (Title 24), including:

- Part 1 – California Administrative Code (DSA administrative procedures),
- Part 2 – California Building Code,
- Part 3 – California Electrical Code,
- Part 4 – California Mechanical Code,
- Part 5 – California Plumbing Code,
- Part 6 – California Energy Code, Part 9 – California Fire Code,
- Part 11 – California Green Building Standards Code (CALGreen),
- Part 12 – California Referenced Standards Code.

Fresno County

While the County of Fresno is not responsible for reviewing the project plans, the project would also be designed to comply with relevant County of Fresno ordinances and standards. Relevant ordinances and standards to the project include:

- Fresno County Public Improvement Standards and Section 855 Property Development Standards, for stormwater basin design standards.
- Fresno County Noise Control Ordinance Chapter 8.40.
- Fresno County Department of Public Health Well Destruction Requirements (including Division of Water Resources Water Well Standards Bulletin 74-91 and 74-90, and subsequent revisions).

5. Actions Required to Implement the Project

The District must undertake the following actions to implement the project:

- Complete Evaluation and Clean-up of School Site Process. Review Phase 1 Environmental Site Assessment and determine if a Preliminary Environmental Assessment (PEA) is needed. The Department of Toxic Substances Control (DTSC) will issue either a “No Action” determination or require a Preliminary Environmental Assessment (PEA) to evaluate the proposed site for threats to human health or the environment. The District would implement any measures required by DTSC.
- Plan Review and Approval from the Division of State Architects (DSA).
- Complete the California Environmental Quality Act (CEQA) process for the project by adopting a mitigated negative declaration for the project.
- Adopt and implement the Mitigation Monitoring and Reporting Program (MMRP) identified in Section F of this Initial Study.
- Approve the project.
- Receive a well destruction permit from Fresno County.
- Submit a Notice of Non-Applicability (NONA) to the State Water Resources Control Board (SWRCB).
- Receive Indirect Source Review (ISR) Air Impact Assessment (AIA) approval letter from the San Joaquin Valley Air Pollution Control District (SJVAPCD)
- Receive Dust Control Plan (DCP) approval from the SJVAPCD.

6. Project Schedule

The construction of the project is estimated to start in October 2025 and be completed in November 2028. Phase 1 construction is expected to occur between October 2025 through September 2026, Phase 2 is expected to occur between June 2026 through May 2027, and Phase 3 is expected to occur between June 2027 through November 2028.

7. Project Setting

a) Existing Land Uses

The project site encompasses a 21.5-acre area, which includes existing athletic facilities, a parking lot, an educational agricultural barn, agricultural fields, a private road, and a stormwater basin. The project area is owned by the Riverdale Joint Union School District, and the agricultural fields are leased out to be used for crop farming. The athletic facilities are a part of the adjacent Riverdale High School and are used for athletics, entertainment, and academic purposes.

b) Public Land Use Policies

The project is not within an incorporated city and is therefore subject to the County of Fresno public land use policies. The subject parcels are designated as Limited Agriculture and may be developed, provided the proposed development is consistent with existing community plans (County of Fresno, 2024). The Riverdale Community Plan suggests that a public park located in the vicinity of the project site would be an asset to the community (County of Fresno, 2013). Agricultural Limited use parcels are permitted for Animal Use, which includes the raising of livestock for school projects, which would occur at the new ag barn (County of Fresno, 2024). Additionally, nonresidential uses, such as a new educational ag barn, may be built on Limited Agricultural zoned land with ministerial approval from the County's Planning and Development Director (County of Fresno, 2024).

c) Zoning

The project site's parcels are currently zoned as Limited Agriculture (County of Fresno, 2024).

d) Streets and Highways

The project site is north of Mt. Whitney Avenue within Riverdale, CA. Most of the project is west of S. Marks Avenue and east of S. Hazel Avenue. However, the stormwater basin and the proposed expansion site are located west of S. Hazel Avenue, and just south of the Turner Ditch canal.

e) Public Utilities and Services

The existing facilities are currently serviced by the Riverdale Public Utility District, which provides wastewater and water services. The site's stormwater drainage is collected by the District's underground stormwater drainage system, which discharges to the District's stormwater basin to the northwest. Gas and Electricity are provided by Pacific Gas & Electric. Solid Waste disposal is provided by Mid Valley Disposal.

f) Climate

The climatic conditions of the project are typical of the central San Joaquin Valley, consisting of hot, dry summers and mild, wet winters, characteristic of a Mediterranean climate. The local meteorology of the area is represented by measurements recorded by the National Weather Service. The monthly average temperatures recorded between 1991 and 2020 range from 54°F (Fahrenheit) in January to 83°F in

August. The annual average temperature is 65°F. December, January, and February typically are the coldest months in this area. Annual rainfall in the project area occurs mostly between December and March, with an average of approximately 10.9 inches per year (National Oceanic and Atmospheric Administration, 2025).

g) Police and Fire

The project area is served by the Fresno County Sheriff and the Riverdale Public Utility District, which administers a volunteer fire department for the Riverdale community.

h) Transit

The nearest transit stop is a bus stop for the Fresno County Rural Transit Agency (FCRTA) located approximately 0.3 miles southeast of the project site. This serves a transit route along Mt. Whitney Road.

8. Request for Preliminary Comment

The District distributed a Request for Preliminary Comment for the project on January 13, 2025, to Trustee, Responsible, and other public agencies that might be interested in the project. The request provided an opportunity to comment on the project's potential environmental effects, including whether an Environmental Impact Report, Mitigated Negative Declaration, or Negative Declaration should be prepared for the project. On January 17, 2025, the District posted on its website a community notice in English and Spanish about the proposed project to welcome comments from school staff, parents, students, and the public. Comments from reviewing agencies were considered in the analysis presented in this Initial Study. There were no comments received from school staff, parents, students, or the public.

9. Other Public Agencies Whose Approval is Required

Implementation of the project would require approvals from the following public agencies in addition to the District:

Table 3
Responsible Public Agencies

Public Agencies	Approval(s)
County of Fresno	Approve well destruction permit.
San Joaquin Valley Air Pollution Control District	Compliance with applicable rules and regulations, including but not limited to Regulation VIII (Dust Control Plan) and Rule 9510 (Indirect Source Review).
Division of State Architect	Review and approve the design of school facilities.
Department of Toxic Substances Control	Complete Evaluation and Clean-up of School Site Process. Review Phase 1 Environmental Site Assessment and determine if a Preliminary Environmental Assessment (PEA) is needed.

10. Consultation with California Native American Tribes

In accordance with Public Resources Code Section 21080.3.1 (Assembly Bill 52, 2013–2014), the lead agency is required to notify, in writing, any California Native American Tribe that has previously requested notification of projects within the geographic area of a proposed project. This notification must be provided within 14 days of the agency's decision to undertake a project subject to CEQA. The notification includes a brief description of the project and invites the Tribe to indicate whether it wishes to initiate formal consultation.

If the Tribe elects to consult, the lead agency must begin the consultation process within 30 days of receiving the request. The consultation continues until either: (1) the parties agree on mitigation measures, (2) the parties agree that mitigation is not necessary, or (3) either party concludes that a mutual agreement cannot be reached despite a good faith effort.

The District received correspondence from the Santa Rosa Rancheria Tachi-Yokut Tribe (SRR) on April 17, 2025, via email expressing their concerns and requesting mitigation measures. All other contacted California Native American Tribes either did not respond or responded stating that their tribe had no concerns with the project. The District and the SRR engaged in formal consultation on May 16, 2025, to discuss potential project impacts and the

best methods to mitigate them. As of the date of publishing this Draft IS/MND, the District and the SRR are still consulting to determine the appropriate mitigation measures to protect potentially present tribal cultural resources from project activities. The mitigation measures outlined in Section 18, Tribal Cultural Resources, of this study are proposed draft measures for consideration by the SRR. The District invites both public and private comments from the SRR regarding the protection of tribal cultural resources. The District is committed to engaging in dialogue to address any concerns and to reach a consensus with the SRR prior to issuing a Notice of Determination.

B. Environmental Factors Potentially Affected

Based on the evaluations in Part E, the project would have a less than significant impact on the environmental factors listed in the following table. Those factors that require mitigation to be incorporated into the project to be less than significant are noted with an "X".

TABLE 4

Environmental Factors Potentially Affected

	Aesthetics		Agricultural and Forestry Resources		Air Quality
X	Biological Resources	**X**	Cultural Resources	**X**	Energy Resources
X	Geology and Soils	**X**	Greenhouse Gas Emissions		Hazards and Hazardous Materials
	Hydrology and Water Quality		Land Use and Planning		Mineral Resources
	Noise and Ground-borne Vibration		Population and Housing		Public Services
	Recreation		Transportation	**X**	Tribal Cultural Resources
	Utilities and Service Systems		Wildfire	**X**	Mandatory Findings of Significance

C. Determination

Based on this Initial Study, I find that the _____ Project could have significant effects on the environment, but mitigation measures incorporated in the project by the _____ will avoid the effects or render them less than significant. Therefore, a Mitigated Negative Declaration is recommended for adoption.

_____

Signature Date

_____

Print Name Title

D. Evaluation of Environmental Impacts

1. State CEQA Guidelines Appendix G Environmental Checklist

This Initial Study identifies and analyzes the potential impacts of the project on the environmental resources and conditions listed in Appendix G in the State CEQA Guidelines and describes feasible mitigation measures that could be incorporated into the project to avoid the impacts or reduce them to an insignificant level and determines the significance of the impact with or without mitigation. The environmental resources and conditions listed in Appendix G are categorized as follows: Aesthetics, Agricultural 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, Mineral Resources, Noise, Population and Housing, Public Services, Recreation, Transportation, Tribal Cultural Resources, Utilities, and Service Systems, Wildfire, and Mandatory Findings of Significance.

The discussion of each impact in Part E of this Initial Study concludes with a determination that the impact is potentially significant, less than significant with mitigation, less than significant, or does not involve any impact (no impact).

The "potentially significant" determination is applied if there is substantial evidence that an effect may be significant. Under the State CEQA Guidelines, a significant effect, or impact, on the environment means a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance (see Guidelines Section 15382). The District must prepare an Environmental Impact Report for the project if the Initial Study identifies one or more potentially significant impacts.

The "less than significant impact with mitigation incorporated" determination applies when the incorporation by the District of mitigation measures in the project would reduce an impact from potentially significant to less than significant. This Initial Study describes each mitigation measure the District has incorporated into the project to reduce potentially significant impacts to a less-than-significant level.

The "less than significant" determination applies when the project would not result in a significant effect on a resource or condition. The less-than-significant determination is used only in cases where no mitigation measures are required to reduce the impact to a less-than-significant level.

The "no impact" determination applies when the project would have no impact on a resource or condition, or the resource or condition does not apply to the project or its location.

The discussion of impacts in this Initial Study lists each potential impact as stated in Appendix G, provides an analysis of the impact, describes each mitigation measure required to avoid the impact or reduce it to an insignificant level, and concludes with a determination of the level of significance of the impact. References to documents that would provide background information on an impact are provided where applicable.

This Initial Study incorporates by reference all documents and other sources of information cited in the Evaluation of Environmental Impacts (Part E) and Sources Consulted (Part H).

2. Existing Laws, Regulations, Policies, and Mitigation Measures

In some cases, an impact that might appear to be significant is less than significant because it is subject to state, regional, or local laws, regulations, or policies – the application of which will reduce the impact to a less than significant level. The preparation of this Initial Study included a review of applicable laws, regulations, and policies to determine if they would prevent or reduce the potentially significant impacts of the project. The Initial Study does not cite the laws, regulations, and policies as mitigation measures because they would apply to the project regardless of the outcome of the Initial Study. For the project, applicable laws, regulations, and policies include but are not limited to the following:

State of California: The state requirements include, but are not limited to the following:

- **Education Code Section 17213, Public Resources Code Section 21151.8; and California Code of Regulations, Title 5, Section 14011[h],[i]; Title 14, Section 15093**:

  Requires the District Board to adopt findings stating: (1) the proposed school site is not a current or former waste disposal site; (2) the site is not a hazardous substance release site; (3) the site does not contain pipelines; and (4) whether a qualified freeway and/or qualified traffic corridor is located within 500 feet of the site. In addition, it requires board-adopted findings for hazardous air emitters and hazardous material handlers located within a 1/4 mile of the site.

- **Education Code Section 17215 and California Code of Regulations, Title 21, Division 2.5, Chapter 2.1: Airports:**
  Requires providing notice to the State Department of Education if a proposed school site is within two nautical miles, measured by air line, of that point on an airport runway or a potential runway is included in the airport master plan that is nearest to the site. The Department of Education is required to consult with the Department of Transportation as to the safety of the site concerning airport operations.

- **Title 5, California Code of Regulations, Article 2, Section 14010, Standards for School Site Selection:**

  The standards address: possible hazards related to power line easements, railroads, airports, major streets, above-ground pipelines, underground pipelines, above-ground storage tanks, traffic, noise, seismicity, geology, soils, flooding, dam flood inundation, incompatible zoning, and other safety-related factors.

- **Title 24, California Code of Regulations, Part 1 through Part 12:**
  Specifies the State of California building regulations for public schools. The Division of the State Architect is responsible for administering the regulations.

State Water Resources Control Board
The National Pollutant Discharge Elimination System Program (NPDES) program pursuant to the federal Clean Water Act and the State Water Resources Control Board's Construction General Permit (Order No. 2022-0057-DWQ).

San Joaquin Valley Air Pollution Control District

Regulation VIII – Fugitive PM10 Prohibitions, Regulation IX – Mobile and Indirect Sources, Rule 9510 – Indirect Source Review (https://www.valleyair.org/rules/1ruleslist.htm)

Fresno County

- County of Fresno General Plan
- County of Fresno Zoning Ordinance
- Fresno County Ordinance Code
- Riverdale Community Plan

E. Environmental Checklist

The questions in Sections E, 1-20 are taken from the State CEQA Guidelines, Appendix G: Environmental Checklist Form, Evaluation of Environmental Impacts. The thresholds of significance used for this Initial Study are the same as the environmental issues listed in the Appendix G Checklist.

1. Aesthetics

Except as provided in Public Resources Code § 21099, would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 nonurbanized 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 a 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 light and glare that would adversely affect day or nighttime views in the area?			X	

Environmental Setting

The project site is on the campus of Riverdale High School in the Census-designated community of Riverdale, Fresno County, California. The land around the project consists of level farmland to the north and east, and residential homes to the southwest. Views around the greater project location include open flat farmland to the west and north, a dairy to the east, and residential houses to the southwest. The Phase 1 area is an existing football stadium/track and parking lot, and the Phase 2 and 3 areas are designated as Prime Farmland. According to the California Department of Transportation, the closest eligible or officially designated scenic highway is State Route 198 (ending at Route 33), which is about 25 miles southwest (California Department of Transportation, 2025).

The County of Fresno's Code Ordinance does not include requirements for outdoor lighting. However, this analysis will refer to the City of Fresno ordinance regarding outdoor lighting as a guideline. The City of Fresno requires light trespass to be limited to 1.0 foot-candle onto public streets and limited to 0.5 foot-candle onto residentially zoned property or property containing residential uses (City of Fresno, 2025). A foot-candle is a unit of measurement used to measure the intensity of light. The County of Fresno does not require limiting outdoor lighting, but this impact analysis uses the City of Fresno's ordinance on outdoor lighting and illumination as a guideline to assess impacts. Though the City of Fresno has no jurisdiction over the community of Riverdale or the project, it provides lighting thresholds to consider for the impacts of lighting on residents.

The project would include the removal of eight 70’ light posts at the existing stadium and the installation of four 90’ light posts. Additionally, the athletic fields in Phase 2 include the installation of twelve 30’ light poles. The parking lot reconstruction would include up to twelve 15’ to 20’ light poles.

The stadium lights would be designed to limit light trespass at a maximum of 0.30 foot-candles at a 5’ height, and 300’ away from the light posts. The nearest public road is approximately 575’ away; the nearest residential use is approximately 640’ away.

Except as provided in Public Resources Code Section 21099, would the project:

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

No Impact

The terrain of the project site is level and adjacent to open agriculture fields, residences, a church, the Riverdale Veterans Memorial building, and some commercial and retail areas. Distant views of the Sierra Nevada Mountains to the east and northeast are sometimes visible but frequently obscured due to poor air quality or atmospheric conditions. The Fresno County General Plan Review (County of Fresno, 2024) and the Fresno County General Plan Background Report (County of Fresno, 2000) did not identify or designate any scenic vistas within or near the project area. The project site is not in a viewshed of a scenic vista or near any eligible or officially designated scenic highways. Upon completion, the project would modify the surrounding vicinity's viewshed but not obscure any aesthetic features. Therefore, there would be no impact on scenic vistas.

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

Less than Significant

There are no rock outcroppings or historic buildings on the campus. A portion of State Route 198 is eligible as a scenic highway. It is about 25 miles southeast of the project (California Department of Transportation, 2025). Landscaped oleander bushes along the north stadium soil berm, a soil berm around the stadium, and approximately ten landscaped trees around the Ag Barn would be removed. The trees removed would be replaced with new landscaping. Therefore, there would be a less than significant impact on scenic resources, historic buildings, or a state scenic highway.

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 a 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?

No Impact

The project would modernize the existing stadium, construct the three additional turf-grass athletics fields to an existing sports complex, and demolish and reconstruct a new Ag Barn. The stadium remodel would enhance the visual aspects of the existing stadium, the three athletics fields would match the visual characteristics of the surrounding sports facilities, and the new Ag Barn located at the north of the project site would match the agricultural characteristics of the farmland surrounding the north of the project site. The project would not substantially degrade the existing visual character or quality of the site and its surroundings, therefore, there would be no impact.

d. Create a new source of light and glare that would adversely affect day or nighttime views in the area?

Less than Significant Impact

The project would remove and replace eight 70' tall stadium light posts with four 90' tall light posts for the proposed stadium remodel. To minimize light trespassing across property boundaries or skyward, lights and light fixtures would be located, aimed, or shielded accordingly. Additionally, the project would use fully shielded fixtures equipped with automatic timing devices to focus the lighting and minimize glare and light trespass. The nearest residential property is approximately 640' away. The light trespass onto the nearest public road and residential land uses from the proposed stadium lights would be 0.3 foot-candles, which is below the 0.5 foot-candle threshold for City of Fresno requirements.

The parking lot remodel may include up to twelve 15 to 20-foot-tall light poles. However, the new stadium lights would minimize light trespass to a maximum of 0.30 foot-candles at a 300-foot distance. The parking lot remodel may include up to twelve 15 to 20-foot-tall light poles. The nearest residential property to the nearest light pole would be 200 ft to the west. Light fixtures on the proposed light poles would be focused to the proposed reconstructed parking lot area and would be equipped with light shielding equipment to prevent light trespass to nearby non-campus properties.

The project would also install up to twelve parking lot light poles in the reconstructed parking lot and include 12 30-foot 'practice' light poles, located and oriented as shown in Figure 4. These light poles would be equipped with light shielding equipment, oriented away from existing residential properties, and aimed towards the proposed multi-use athletics fields. The nearest light pole would be located 250 feet east of the nearest residential property, and this light pole would be pointed north, not towards the residential property. The nearest light pole that would be aimed in the direction of a residential property would be approximately 560 feet northeast of the nearest residential property. At this distance and 30-foot height, significant light trespass is not anticipated.

For the reasons stated above, the project would result in a less than significant impact on daytime and nighttime views.

2. Agriculture and Forestry Resources

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non- agricultural use?			X	
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?				X
c. Conflict with existing zoning for, or cause rezoning of, forestland, timberland, or timberland zoned Timberland Production?				X
d. Result in the loss of forestland or conversion of forestland to non-forest use?				X
e. Involve other changes in the existing environment which, due to their location or nature, could result in the conversion of Farmland, to non-agricultural use or conversion of forestland to non-forest use?			X	

Environmental Setting

Fresno County is a hub of agricultural productivity in California. In 2023, Fresno County's agricultural production totaled 8.58 billion dollars, a 6.1% increase from 2022. Top commodities produced in Fresno County included grapes at $1.33 billion, almonds at $1.02 billion, and pistachios at $862 million. A variety of over 300 different commodities are produced in Fresno County due to its rich soils, large areas of dedicated farmland, supply of irrigation water, Mediterranean climate, and transportation infrastructure (Fresno County Department of Agriculture and Weights and Measures, 2024).

Farmland Mapping and Monitoring Program (FMMP): The FMMP produces maps and statistical data used for rating California's agricultural land resources. Agricultural land is rated according to soil quality and irrigation status, where the best quality land is designated as Prime Farmland. Maps are updated every two years using computer mapping, aerial imagery, public review, and field investigations. The California Department of Conservation's (DOC) 2020 FMMP is a non-regulated program that creates "Important Farmland" maps and statistical data for analyzing California's agricultural resources. The Important Farmland maps identify eight land categories, summarized below:

Prime Farmland (P): Farmland with the best combination of physical and chemical features able to sustain long-term agricultural production. This land has the soil quality, growing season, and moisture supply needed to produce sustained high yields. Land must have been used for irrigated agricultural production at some time during the four years before the mapping date. According to the most recent data from 2018, the County has approximately 672,208 acres of land designated as Prime Farmland (Fresno, 2024).

Farmland of Statewide Importance (S): Farmland that is similar to Prime Farmland but with minor shortcomings, such as greater slopes or less ability to store soil moisture. Land must have been used for irrigated agricultural production at some time during the four years before the mapping date.

Unique Farmland (U): Farmland of lesser quality soils used for the production of the state's leading crops. This land is usually irrigated but may include non-irrigated orchards or vineyards as found in some climatic zones in California. Land must have been cropped at some time during the four years before the mapping date.

Farmland of Local Importance (L): Land of importance to the local agricultural economy as determined by each county's board of supervisors and a local advisory committee.

Grazing Land (G): Land on which the existing vegetation is suited to the grazing of livestock.

Urban and Built-Up Land (D): Land occupied by structures with a building density of at least 1 unit to 1.5 acres, or approximately 6 structures to a 10-acre parcel. This land is used for residential, industrial, commercial, construction, institutional, public administration, railroad and other transportation yards, cemeteries, airports, golf courses, sanitary landfills, sewage treatment, water control structures, and other developed purposes.

Other Land (X): Land not included in any other mapping category. Common examples include low-density rural developments; brush, timber, wetland, and riparian areas unsuitable for livestock grazing; confined livestock, poultry, or aquaculture facilities; strip mines, borrow pits; and water bodies smaller than forty acres. Vacant and nonagricultural land surrounded by urban development and greater than 40 acres is mapped as Other Land.

Water (W): Perennial water bodies with an extent of at least 40 acres.

According to the FMMP, Fresno County has approximately 374,567 acres of Prime Farmland, 144,243 acres of farmland of Statewide importance, 96,724 acres of unique farmland, and 29,663 acres of farmland of local importance (Department of Conservation 2020).

The important farmland designation from the 2020 FMMP and designation of lands enrolled in the Williamson Act of the project site and surrounding areas are shown in Figures 5 and 6 below, respectively. These figures show that approximately 6.25 acres of Prime Farmland are within the project site, and that no areas of the project are enrolled in Williamson Act contracts.

Figure 5: FMMP Important Farmland Map

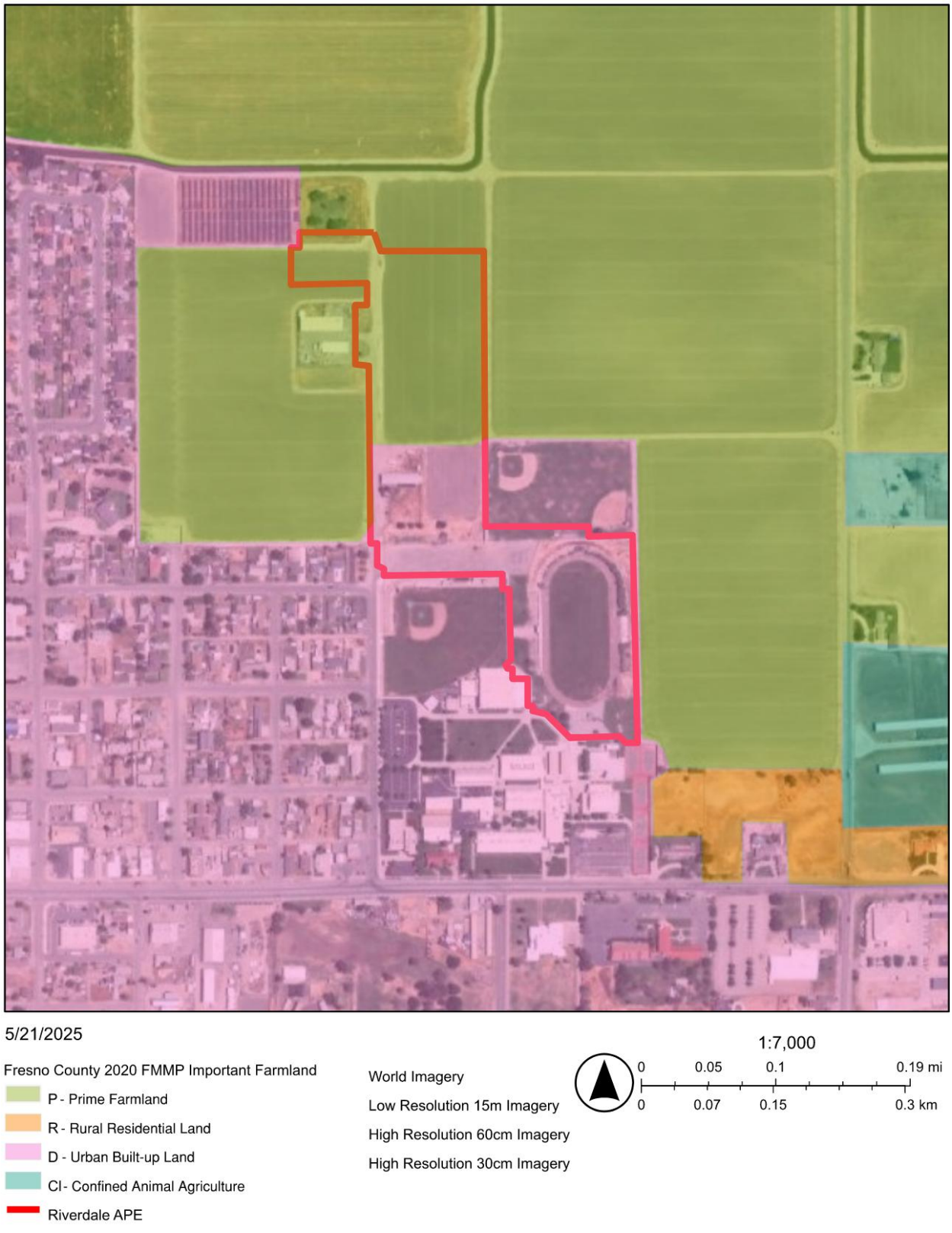
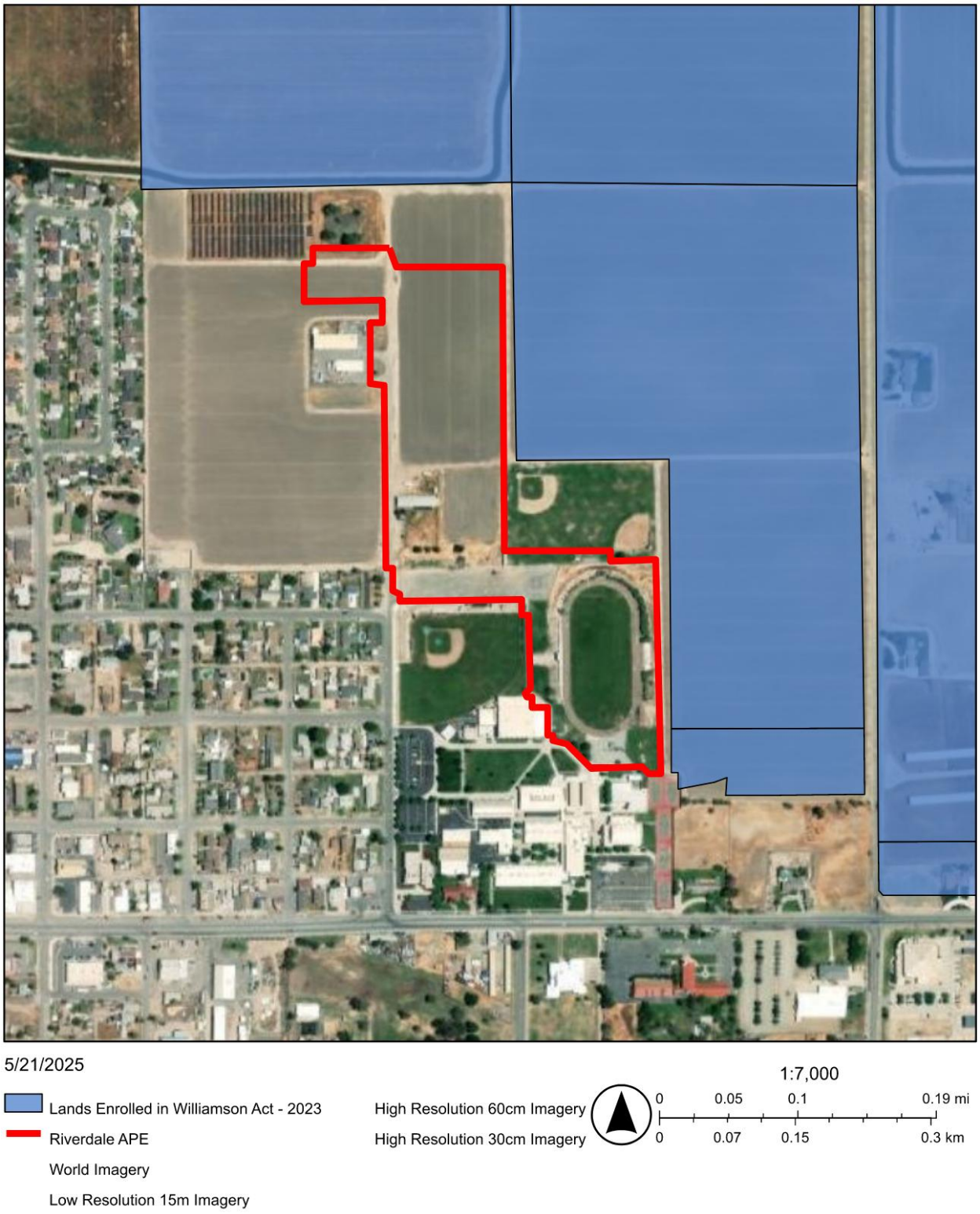


Figure 6: Lands Enrolled in the Williamson Act



Regulatory Setting

The 2024 County of Fresno General Plan includes goals and policies related to agricultural resource conservation (Fresno County, 2024). Relevant policies include:

> **LU-A.1: Agricultural Land Conservation.** The County shall maintain agriculturally designated areas for agricultural use and shall direct urban growth away from valuable agricultural lands to cities, unincorporated communities, and other areas planned for such development where public facilities and infrastructure are available or can be provided consistent with the adopted General or Community Plan.
>
> **LU-A.23: Farmland Conservation.** For discretionary land use projects that are not directly related to or supportive of agricultural uses and which propose the permanent conversion of twenty acres or more of Prime Farmland, Unique Farmland or Farmland of Statewide Importance (as designated by the Farmland Mapping and Monitoring Program) to nonagricultural uses, the County shall consider and adopt feasible measures including, but not limited to:
>
> - Acquisition of conservation easements at a 1:1 ratio for lands lost to nonagricultural uses.
> - Fee title of agricultural mitigation land that may be held by a third party or the County.
> - In lieu fees paid to the County that may be used to acquire future mitigation property.
> - Mitigation banks.
>
> The County may exempt projects from agricultural mitigation requirements when it has been determined that conversion is occurring pursuant to a local groundwater sustainability plan, or the project is for housing which is predominantly for persons of low or moderate income as defined in section 50093 of the Health and Safety Code. Further, the County may exempt discretionary land use projects from agricultural mitigation requirements if it finds that the loss of agricultural land caused by the proposed conversion is outweighed by specific overriding economic, legal, social, technological, or other benefits of the conversion, as contemplated by section 21081(b) of the Public Resources Code.
>
> In 1992, Fresno County adopted the Riverdale Community Plan. This plan discusses goals for the preservation of agricultural resources, planned development areas, and other priorities for the community of Riverdale. The plan states that Riverdale is an agricultural service center for nearby farms and dairies, and that the community's boundaries remaining compact is essential to not displace agricultural operations (County of Fresno, 2013).

Would the project:

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

Less than Significant Impact

The project site includes approximately 6.5 acres of designated Prime Farmland that is currently owned by the District which is leased for commercial farming. The project would convert these areas of Prime Farmland to the following agricultural and non-agricultural land uses:

- 0.60 acre for expansion of the existing campus stormwater basin to the south,
- 2.65 acres for the multi-use athletics fields, aka "community fields", and
- 3.25 acres for a new Ag Barn and surrounding pastures and orchards.

The conversion of 3.25 acres of Prime Farmland to a new Ag Barn for student education, including pastures and orchards, would be a compatible land use for Prime Farmland. The conversion of Prime Farmland due to the expansion of the stormwater basin and community fields (totaling 3.25 acres) to non-agricultural uses would amount to approximately 0.00087% of the County's total Prime Farmland.

The County's land use policy for farmland conversion, LU-A.23, requires mitigation for the conversion of 20 or more acres of agricultural land, therefore, this County policy does not apply to the project. The project would also comply with the goals of LU-A.1 by focusing development within an existing unincorporated community.

Conversion of Prime Farmland to non-agricultural uses would be consistent with the Riverdale Community Plan. The Community Plan anticipates future urban development within the existing community boundaries of Riverdale and states the goal of leaving areas outside of the community dedicated to agriculture. Additionally, the Community Plan states that Riverdale lacks public recreation space, and additional public park space would be an asset to the community, and "a location in the north part of the community would probably be best." (County of Fresno, 2013). The project would construct a new quasi-public recreation facility in line with this adopted goal in the Riverdale Community Plan.

The project would provide benefits to local agriculture that offset the conversion of Prime Farmland to non-agricultural land use. The expanded stormwater retention basin would provide flood control for surrounding farmland and promote groundwater recharge. The proposed upgraded Ag Barn would allow the District to operate an agricultural education program for students in the community, which would provide skills and knowledge to the next generation of the community and would promote agriculture as a career to the many students who would use the Ag Barn.

Additionally, the 2.65 acres of farmland that would be converted into athletic fields could feasibly be converted back to farmland as the soil would not be significantly degraded due to the land use change. This area could be returned to farmland in the future, so the Prime Farmland resource would not be permanently lost.

As discussed above, the project would be consistent with the County's agricultural land conservation policies and the Riverdale Community Plan. The project would provide benefits to local agriculture through flood protection, groundwater recharge, and provide a critical agricultural educational resource for the students at Riverdale High School. Therefore, the project would have a less than significant impact.

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

Less than Significant Impact

The project would involve converting land zoned as Limited Agriculture to new athletic playfields and a new educational agricultural barn. Both land uses are allowed under the Fresno County Zoning Ordinance. Public facilities, such as the athletic playfields and educational agricultural barn, can be constructed on Limited Agriculture zoned land with ministerial approval from the Director of Planning and Development (County of Fresno, 2024). As mentioned in the previous analysis, the project would be consistent with the Riverdale Community Plan, by developing recreational in a location that is identified as needing additional recreational space.

Furthermore, the project site is not located within parcels enrolled in a Williamson Act contract. Therefore, the project would have a less than significant impact.

c. Conflict with existing zoning for, or cause rezoning of, forestland, timberland, or timberland zoned timberland production?

No Impact

There are no forests or timberland on the campus or in the vicinity. The project would not conflict with or change zoning for forest land, timberland, or Timberland Production zoned land. There would be no impact.

d. Result in the loss of forestland or conversion of forestland to non-forest use?

No Impact

The project would not result in the loss or conversion of forest land to non-forest use. There would be 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 forestland to non-forest use?

Less than Significant Impact

Proposed changes to the existing environment include the conversion of agricultural land to playfields, expansion of an existing basin, and the relocation and reconstruction of a new Ag Barn, as well as renovations to the existing stadium. Surrounding land uses include Prime Farmland owned by the District that is leased for commercial farming and District maintenance facilities located west of Hazel Avenue and north of the proposed Ag Barn. Land to the north and east of the stadium is privately owned Prime Farmland and is contiguous to large areas of farmland to the north and a dairy operation to the east.

Since the District owns the surrounding Prime Farmland to the west of Hazel Avenue and north of the proposed Ag Barn, the District would be the sole actor capable of converting this land to non-agricultural uses. If future development is planned to expand District facilities that would convert Prime Farmland to non-agricultural uses, the District would analyze potential environmental impacts of future projects and implement mitigation measures as necessary. The project is not anticipated to encourage privately-owned agricultural lands located east and north of the stadium to convert to non-agricultural uses since the project would not cause a need for additional housing or commercial space. Furthermore, the proximity of this area to a large dairy operation and the distance to the Riverdale community core make development of this land unlikely.

Lastly, there is no surrounding forestland that could be converted to non-forest use. Therefore, the project would have a less than significant impact.

3. Air Quality

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Conflict with or obstruct implementation of the applicable air quality plan?			X	
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality?			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	

An Air Quality & Greenhouse Gas Impact Analysis report was prepared for this project by Blair, Church & Flynn and is included as Appendix A to this Initial Study. This Initial Study incorporates information and analysis from this report to evaluate impacts on air quality.

Regulatory Setting

The SJVAPCD is tasked with implementing programs and regulations required by the Federal Clean Air Act (FCAA) and the California Clean Air Act (CCAA). In that capacity, the SJVAPCD has prepared plans to attain Federal and State ambient air quality standards. According to the CEQA Guidelines, the significance criterion established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. The project is within the jurisdiction of the San Joaquin Valley Air Pollution Control District (SJVAPCD The SJVAPCD guides air quality analysis under CEQA in its *Guidance for Assessing and Mitigating Air Quality Impacts* (GAMAQI) (San Joaquin Valley Air Pollution Control District, 2015).

The GAMAQI guidance document includes recommended thresholds of significance to be used for the evaluation of short-term construction, long-term operational, odor, toxic air contaminant, and cumulative air quality impacts. Accordingly, the SJVAPCD-recommended thresholds of significance are used to determine whether implementation of the proposed project would result in a significant air quality impact. The thresholds of significance are summarized below.

- Short-term Emissions—Construction impacts associated with the proposed project would be considered significant if project-generated emissions exceeded 100 tons per year (TPY) of CO, 10 TPY of ROG or NOx, 27 TPY of SOx, or 15 TPY of PM_{10} or $PM_{2.5}$.
- Long-term Emissions—Operational impacts associated with the proposed project would be considered significant if project-generated emissions would exceed 100 TPY of CO, 10 TPY of ROG or NOx, 27 TPY of SOx, or 15 TPY of PM_{10} or $PM_{2.5}$.
- Conflict with or Obstruct Implementation of Applicable Air Quality Plan—Due to the region's non-attainment status for ozone, $PM_{2.5}$, and PM_{10}, if project-generated emissions of ozone precursor

pollutants (i.e., ROG and NOx) or PM would exceed the SJVAPCD's significance thresholds, then the project would be considered to conflict with the attainment plans.

- Local Mobile-Source CO Concentrations—Local mobile source impacts associated with the proposed project would be considered significant if the project contributes to CO concentrations at receptor locations more than the CAAQS (i.e., 9.0 ppm for 8 hours or 20 ppm for 1 hour).
- Exposure to Toxic Air Contaminants (TACs) would be considered significant if the probability of contracting cancer for the Maximally Exposed Individual (i.e., maximum individual risk) exceeded 20 in 1 million or would result in a Hazard Index greater than 1.
- Odor impacts associated with the proposed project would be considered significant if it could frequently expose members of the public to objectionable odors.

In addition to the above thresholds, the SJVAPCD recommends daily emissions thresholds for the evaluation of project impacts on localized ambient air quality conditions. Accordingly, the proposed project would also be considered to result in a significant contribution to localized ambient air quality if on-site emissions for ROG, NOx, PM_{10}, $PM_{2.5}$, CO, or SO_2 associated with either short-term construction or long- term operational activities would exceed a daily average of 100 pounds per day (lbs/day) for each of the pollutants evaluated (San Joaquin Valley Air Pollution Control District, 2015).

Thus, projects with emissions below the thresholds of significance for criteria pollutants would be determined not to conflict with or obstruct the implementation of the SJVAPCD air quality plans.

The SJVAPCD GAMAQI also provides guidance on screening projects for offensive odors. These screening levels can be used to qualitatively assess a project's potential adverse effect on nearby receptors. The screening level from the GAMQI for the most relevant land use type of a feed lot/dairy is 1 mile.

In the context of odors, the project site is located near a large dairy operation to the east, occupying approximately 76 acres. The east edge of the project site is approximately 850 feet to 2,450 feet northeast of the west perimeter of the dairy. Based on the SJVAPCD's screening levels for objectionable odors, the project site and most of the community of Riverdale would experience objectionable odors caused by the nearby large dairy operation.

Would the project:

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

Less than Significant Impact

Per the SJVAPCD-recommended methodology for assessment of air quality impacts, projects that result in significant air quality impacts at the project level are also considered to have a significant cumulative air quality impact. As noted in Impact AQ-B, short-term construction and long-term operational emissions would not exceed applicable thresholds. Additionally, the proposed project would not increase VMT and would therefore not be inconsistent with the Fresno Council of Governments (FCOG) 2022 Regional Transportation Plan and Sustainable Communities Strategies (RTP/SCS) (Fresno Council of Governments, 2022) or the FCOG Priority Climate Action Plan (PCAP) (Fresno Council of Governments, 2024).

Additionally, the Project would comply with applicable SJVAPCD Rules and Regulations. The following SJVAPCD requirements apply to the project:

- SJVAPCD Regulation VIII (Fugitive Dust Control) – The project would be required to implement measures to mitigate fugitive dust from construction activities.
- SJVAPCD Rule 9510 (Indirect Source Review or "ISR") – projects that are above the applicability size thresholds must prepare and submit to SJVAPCD an Air Impact Assessment (AIA) application. SJVAPCD would complete an assessment of project emissions for NOx and PM_{10} and require air quality mitigation fees or measures if project emissions are determined to be over the threshold of 2.0 TPY.

For these reasons, implementation of the proposed project would not be anticipated to conflict with air quality attainment or maintenance planning efforts. This impact would be considered less than significant.

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

Less than Significant Impact

The proposed project is in Riverdale, California, in Fresno County, which is within the San Joaquin Valley Air Basin (SJVAB), which is designated as nonattainment for 1-hour ozone, 8-hour ozone, PM_{10}, and $PM_{2.5}$. The SJVAB attainment status for criteria air pollutants is displayed below in Table 5.

TABLE 5.
SJVAB ATTAINMENT STATUS DESIGNATION

Pollutant	Federal Designation	State Designation
Ozone, 1 hour	No Standard	Nonattainment/Severe
Ozone, 8 hour	Nonattainment/Extreme	Nonattainment
PM_{10}	Attainment	Nonattainment
$PM_{2.5}$	Nonattainment	Nonattainment
Carbon Monoxide	Attainment/Unclassified	Attainment/Unclassified
Nitrogen dioxide	Attainment/Unclassified	Attainment
Sulfur dioxide	Attainment/Unclassified	Attainment
Lead (particulate)	No Designation/Classification	Attainment
Hydrogen sulfide	No Federal Standard	Unclassified
Sulfates	No Federal Standard	Attainment
Visibility-reducing particulates	No Federal Standard	Unclassified
Vinyl Chloride	No Federal Standard	Attainment

For more information visit website url: https://ww2.valleyair.org/air-quality-information/ambient-air-quality-standards-valley-attainmnet-status/
Source: (San Joaquin Valley Air Pollution Control District, n.d.)

Potential air quality impacts associated with the proposed project could occur during construction or operation. Short-term construction and long-term air-quality impacts associated with the proposed project are discussed as follows:

Short-Term Construction Emissions

The project would result in a short-term increase in air pollutant emissions. Construction-generated emissions are temporary, occurring only during construction activities, but have the potential to result in a significant air quality impact. The construction of the project would result in temporary generation of

emissions caused by off-road and on-road construction equipment exhaust, as well as emissions released from earth moving (fugitive dust), asphalt concrete paving, and painting (VOCs). Estimated construction-generated annual emissions, per phase, associated with the proposed project are summarized in Table 5 in Appendix A.

Construction of the proposed project would generate maximum uncontrolled annual construction emissions of approximately 0.40 TPY of ROG, 0.81 TPY of NOx, 1.02 TPY of CO, <0.005 TPY of SO_2, 0.14 TPY of PM_{10}, and 0.08 TPY of $PM_{2.5}$. These emissions would remain below the SJVAPCD's annual significance thresholds of 10 TPY for ROG and NOx, 100 TPY for CO, 27 TPY for SO_2, and 15 TPY for PM_{10} and $PM_{2.5}$. Estimated average daily on-site construction emissions are summarized in Table 6 in Appendix A Construction of the proposed project would generate maximum on-site emissions of approximately 64.7 lbs/day of ROG, 31.64 lbs/day of NOx, 30.18 lbs/day of CO, 0.05 lbs/day of SO_2, 9.03 lbs/day of PM_{10}, and 5.20 lbs/day of $PM_{2.5}$. Daily on-site construction emissions would not exceed the SJVAPCD's recommended localized ambient air quality significance thresholds of 100 lbs/day for any of the criteria pollutants. Additionally, project construction would be required to comply with applicable CARB and SJVAPCD rules and regulations. This would further reduce construction-related emissions. For these reasons, the impact of construction-generated emissions would be considered less than significant.

Long Term Operational Emissions

Estimated annual operational emissions for the proposed project are summarized in Table 7 in Appendix A. Upon completion of the project (Phases 1, 2, and 3), the project is expected to generate approximately 0.03 TPY of ROG, 0.05 TPY of NOx, 0.18 TPY of CO, and <0.005 TPY of SO_2, PM_{10}, and $PM_{2.5}$. These emissions would primarily result from mobile sources, building operations (including energy use), and area sources such as occasional use of cleaning products, architectural coatings, and maintenance activities. Operational emissions from the project in 2028 would remain below SJVAPCD's emissions significance thresholds.

Table 7 summarizes the estimated increase in annual average daily on-site operational emissions compared to the existing project site operation. As mentioned, maximum daily emissions would primarily stem from area sources, such as landscape maintenance activities and the use of consumer products. Upon completion of the project (Phase 1, 2, and 3), maximum daily on-site emissions are estimated at 2.00 lbs/day of ROG, 0.33 lbs/day of NOx, 1.8 lbs/day of CO, <0.005 lbs/day of SO_2, 0.13 lbs/day of PM_{10}, and 0.05 lbs/day of $PM_{2.5}$.

Even at maximum levels, daily on-site emissions would remain below the SJVAPCD's localized ambient air quality significance threshold of 100 lbs/day for all criteria pollutants. The long-term operation of the proposed project would not result in a significant impact on regional or local air quality conditions. Additionally, project operation would be required to comply with the 2022 Building Energy Efficiency Standards, which include the requirement to install or utilize pre-existing onsite solar photovoltaic systems and an energy storage system (ESS). This would further reduce operational-related emissions. This impact is considered less than significant.

c. Expose sensitive receptors to substantial pollutant concentrations?

Less than Significant Impact

According to the SJVAPCD GAMAQI (San Joaquin Valley Air Pollution Control District, 2015), the determination of whether project emissions would expose sensitive receptors to substantial pollutant

concentrations is a function of assessing potential health risks. Sensitive receptors are facilities that house or attract children, the elderly, people with illnesses, or others who are especially sensitive to the effects of air pollutants. Hospitals, schools, convalescent facilities, and residential areas are examples of sensitive receptors. When evaluating whether a development proposal has the potential to result in localized impacts, Lead Agency staff need to consider the nature of the air pollutant emissions, the proximity between the emitting facility and sensitive receptors, the direction of prevailing winds, and local topography. Nearby sensitive receptors include the existing Riverdale High School, approximately 100' south of the project site, and private residences approximately 100' east of the project site. Long-term operational and short-term construction activities and emission sources that could adversely impact the nearest sensitive receptors are discussed as follows:

Long-Term Operation

Toxic Air Contaminants

Implementation of the proposed project would not result in the long-term operation of any major onsite stationary sources of TACs, nor would project implementation result in a significant increase in diesel-fueled vehicles traveling along area roadways. No major stationary sources of TACs were identified in the project vicinity that would result in increased exposure of students and employees to TACs. For these reasons, long-term increases in exposure to TACs would be considered less than significant.

Carbon Monoxide

CO is the primary criteria air pollutant of local concern associated with the proposed project. Under specific meteorological and operational conditions, such as areas of heavily congested vehicle traffic, CO concentrations may reach unhealthy levels. If inhaled, CO can be absorbed easily by the bloodstream and inhibit oxygen delivery to the body, which can cause significant health effects ranging from slight headaches to death. The most serious effects are felt by individuals susceptible to oxygen deficiencies, including people with anemia and those suffering from chronic lung or heart disease.

Mobile-source emissions of CO are a direct function of traffic volume, speed, and delay. The transport of CO is extremely limited because it disperses rapidly with distance from the source under normal meteorological conditions. For this reason, modeling of mobile-source CO concentrations is typically recommended for sensitive land uses located near signalized roadway intersections that are projected to operate at unacceptable levels of service (LOS). Localized CO concentrations associated with the proposed project would be considered less-than-significant if: (1) traffic generated by the proposed project would not result in deterioration of a signalized intersection to LOS E or LOS F; or (2) the project would not contribute additional traffic to a signalized intersection that already operates at LOS E or LOS F.

The project is not near a signalized intersection, as there are no signalized intersections in the community of Riverdale. Additionally, the project would not result in a significant increase in vehicle trips. For these reasons, long-term exposure to localized pollutant concentrations would be considered less than significant.

Short-Term Construction

Naturally Occurring Asbestos

Naturally occurring asbestos, which was identified by CARB as a TAC in 1986, is in many parts of California and is commonly associated with ultramafic rock. The project site is not located near any areas that are likely to contain ultramafic rock (U.S Geologic Survey, 2011). As a result, the risk of exposure to naturally occurring asbestos during the construction process would be considered less than significant.

Asbestos-Containing Materials

Demolition activities can have potential negative air quality impacts, including issues surrounding proper handling, demolition, and disposal of asbestos-containing material (ACM). Asbestos-containing materials could be encountered during the demolition of existing buildings, particularly older structures constructed before 1970. Asbestos can also be found in various building products, including (but not limited to) utility pipes/pipelines (transite pipes or insulation on pipes). If a project involves the disturbance or potential disturbance of ACM, various regulatory requirements may apply, including the requirements stipulated in the National Emission Standard for Hazardous Air Pollutants (40CFR61, Subpart M-Asbestos NESHAP). These requirements include, but are not limited to: 1) notification, within at least 10 business days of activities commencing, to the SJVAPCD, 2) an asbestos survey conducted by a Certified Asbestos Consultant, and 3) applicable removal and disposal requirements of identified ACM. The District has completed certified asbestos surveys of all structures to be released at the project site, which resulted in no detection of asbestos containing materials in structures proposed for demolition at the project site (Liddell, 2025). The presence of underground utility pipelines containing asbestos is unknown; however, upon discovery of asbestos-containing utilities, all proper measures to comply with asbestos abatement would be followed. For these reasons, the risk of exposure from asbestos-containing materials during the construction process would be considered less than significant.

Lead-Coated Materials

Demolition of structures coated with lead-based paint can have potential negative air quality impacts and may adversely affect the health of nearby individuals. Lead-based paints could be encountered during the demolition of existing buildings, particularly older structures constructed before 1978. Improper demolition can result in the release of lead-containing particles from the site. Sandblasting or removal of paint by heating with a heat gun can result in significant emissions of lead. In such instances, proper abatement of lead before the demolition of these structures must be performed to prevent the release of lead from the site. Federal and state lead regulations, including the Lead in Construction Standard (29CFR1926.62) and California Code of Regulations (CCR Title 8, Section 1532.1, Lead) regulate the disturbance of lead-containing materials during construction, demolition, and maintenance-related activities. Depending on the removal method, a SJVAPCD permit may be required.

The District has completed certified lead paint surveys for all structures to be demolished at the project site, which determined that the site has no structures containing lead-based paint. As a result, exposure to lead-based paint would be considered less than significant.

Localized PM Concentrations

Fugitive dust emissions would be primarily associated with site preparation, grading, and vehicle

travel on unpaved and paved surfaces. Uncontrolled emissions of fugitive dust may also contribute to potential increases in nuisance impacts to nearby receptors. On-site off-road equipment and trucks would also result in short-term emissions of diesel-exhaust PM (DPM), which could contribute to elevated localized concentration at nearby receptors. Localized concentrations of DPM would be short-term occurring over an approximately three-year period and would constitute less than five percent of the exposure period upon which health-related risks are typically calculated (i.e., 70 years). For this reason, short-term increases in DPM would not be anticipated to exceed SJVAPCD significance thresholds. However, short-term emissions of DPM could contribute to localized increases of particulate matter that may result in short-term nuisance impacts to nearby sensitive receptors. Short-term exposure to airborne particulates can result in irritation of the eyes and the respiratory system and may affect sensitive individuals, including those suffering from asthma and other medical conditions.

The use of diesel vehicles would be intermittent, partially occur during summer when children are not present at Riverdale High School and not expected to occur continuously throughout project construction. Furthermore, all construction would comply with CARB and SJVAPCD regulations related to engine tier requirements and fugitive dust control. The project would therefore not expose sensitive receptors to significant pollutant concentrations and this impact would be less than significant.

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

Less than Significant Impact

According to the SJVAPCD GAMAQI (San Joaquin Valley Air Pollution Control District, 2015), due to the subjective nature of odor impacts, the number of variables that can influence the potential for an odor impact, and the variety of odor sources, there are no quantitative or formulaic methodologies to determine the presence of a significant odor impact. Rather, SJVAPCD recommends that odor analyses strive to fully disclose all pertinent information. The intensity of an odor source's operations and its proximity to sensitive receptors influence the potential significance of odor emissions. SJVAPCD has identified some common types of facilities that have been known to produce odors in the San Joaquin Valley.

During construction, the project may produce odors associated with construction, such as vehicle exhaust odor, asphalt degassing, and paint fumes, although these odors are expected to be intermittent and would no longer be present once construction is complete.

The proposed Ag Barn is the only component of the project expected to emit objectionable odors by operation. The new Ag Barn would be used for the same purpose as the existing Ag Barn to house farm animals for educational purposes and would house animals that would be a source of objectionable odors. The proposed Ag Barn would be located approximately 500 ft north of the old Ag Barn, which is farther from all existing nearest receptors. Table 6 below displays the existing and proposed ag barns' distance from nearby receptors.

TABLE 6.
DISTANCE TO NEARBY RECEPTORS OF EXISTING AND PROPOSED AG BARN

Receptor	Approximate Distance to Existing Ag Barn	Approximate Distance to Proposed Ag Barn
Nearest residential home, located at 3230 Stathem St.	345 feet	960 feet
Varsity baseball field	410 feet	1,030 feet
Practice baseball field	415 feet	720 feet
Nearest football stadium bleachers	720 feet	1,150 feet
Nearest High School building	815 feet	1,360 feet
Row of Residential homes fronting Valley Oak Ln (across the farm west of Hazel Avenue)	930 feet	930 feet

Since the proposed ag barn structure would replace the existing ag barn with a similar function and capacity and be located farther from all existing nearby receptors, no significant increase in objectionable odor would be anticipated. Odors from construction would be intermittent and only present during construction. Therefore, the project would not produce significant odors that would adversely affect a substantial number of people. This impact would be **less than significant**.

4. Biological Resources

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U. S. Fish and Wildlife Service?		X		
b. Have a substantially adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or U. S. Wildlife Service?			X	
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?				X
d. Interfere substantially with the movement of any resident or migratory fish or wildlife species or with established native resident migratory wildlife corridors, or impede the use of native wildlife nursery sites?		X		
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				X
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

A Biological Resources Evaluation (BRE) report was prepared for this project by Blair, Church & Flynn and is included as Appendix B to this Initial Study. This Initial Study incorporates information and analysis from this report to evaluate impacts on 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?

Less than Significant Impact with Mitigation Incorporated

The BRE identified 23 animal and 6 plant special status species that have occurred within the 9-topographic quadrangle search area as defined by the California Natural Diversity Database (see Table A. List of Special Status Plant Species, and Table B. List of Special Status Wildlife Species, in Appendix B).

The project site is a high school campus and land that is highly disturbed by agricultural uses and does not contain the natural communities or conditions preferred by most species on the CNDDB list. Additionally, the remainder of the site is an existing high school campus and its athletic fields, which are regularly maintained and do not provide a suitable habitat for any special status species. The on-site stormwater basin is the least disturbed location, although it was completely dry at the time of the survey. The property owner maintains the basin's vegetation annually by removing unwanted vegetation along the basin's top, slopes, and floor.

Some migratory birds, including the Swainson's Hawk (*Buteo swainsoni*), may nest in the ornamental trees located on the project site or in Cottonwood trees (*Populus fremontii*) in the stormwater basin. At the time of the site visit on February 26, 2025, abscission had occurred, and no evidence of past nesting was seen. A breeding pair of common ravens (*Corvus corax*) was observed building a nest on top of a large stadium light post. During a subsequent site visit on July 15, 2025, by school staff, the nest was reported gone. Ground squirrels (*Otospermophilus beechyi*) were observed in burrows along the stadium berms and the stormwater basin, but the burrows were not active and were filled in at the time. Western burrowing owls will utilize vacant or abandoned mammal burrow for nesting. However, no burrowing owls were seen, or signs of occupancy or indicators were observed.

During Phase 1, demolition of the athletic fields and stadium would include removing the stadium seats and soil berms, trees, and stadium lights. In Phase 2, the existing stormwater basin would be excavated to expand its capacity. Construction activities during all three phases would include clearing, grading, equipment and material storage, construction of temporary structures (work platforms), and painting or washing of structures. If construction occurs during the breeding season (February 1 to September 1), active nests could also be disturbed, potentially causing the loss of eggs or developing young (i.e., nest abandonment during the incubation, nestling or fledgling stages of these species). Disturbance to a breeding pair of migratory birds would be a significant impact as defined by the U.S. Fish and Wildlife Service (U.S. Fish and Wildlife Service, 2023).

Although no burrowing owls or signs of occupancy were observed during the site visit, there remains a low potential for burrowing owls to establish residence in or near the project site prior to the commencement of construction activities. Should burrowing owls occupy the site or its surrounding areas, construction activities could potentially impact this species, which is considered a candidate for endangered status. This would be a significant impact.

Therefore, the project shall implement the following mitigation to reduce the impact to less than significant.

Measure BR-1: Nesting Bird Avoidance and Minimization The nesting bird season is between February 1st and August 31st. Construction activity should be limited to the non-nesting bird season. If construction should occur during the nesting bird season, then a pre-construction nesting bird survey should be conducted to identify any active bird nests within the project area. The survey area should include a buffer area approximately 250' from potential nest sites (e.g., trees and light poles). If an active nest is observed, then one or more of the following actions shall occur:

- A 250' buffer around an active bird nest protected by the MBTA should be implemented.

- A 500' buffer should be implemented around an active raptor nest (e.g., Red-Tailed Hawk, Red-Shouldered Hawk, etc.).
- A 0.5-mile buffer around an active Swainson's Hawk nest. Additionally, a qualified biologist should be present to monitor the Swainson's Hawk nest to determine if construction activity is negatively affecting nesting behavior.
- If a buffer is not feasible, then a qualified biologist should regularly monitor active nests and shall stop construction if construction activity is negatively affecting the active bird nest. A buffer may still be required for an active Swainson's Hawk nest.
- A hybrid approach may be used where a buffer is set around an active bird nest until construction is required near the nest. At this point, a qualified biologist may start to monitor the bird nest.
- No bird nests shall be destroyed during the nesting bird season or when the nest is active.

Mitigation Measure BR-2 Burrowing Owl Surveys. Prior to the initiation of ground-disturbing activities, a qualified biologist shall conduct protocol-level burrowing owl surveys in accordance with CDFW's *Staff Report on Burrowing Owl Mitigation* (California Department of Fish and Game, 2012). Surveys will be conducted at appropriate seasonal windows to assess the presence of burrowing owl within suitable habitat. The surveys will cover the construction footprint of the upcoming phase to be initiated and a 150-meter (approximately 500-foot) buffer zone around the perimeter of the footprint.

Mitigation Measure BR-3. Burrowing Owl Avoidance and Minimization. If burrowing owls are detected during pre-construction surveys, then burrowing owl avoidance and minimization measures following CDFW's *Staff Report on Burrowing Owl Mitigation* shall be implemented. During the nesting season (February 1 through August 31) occupied burrowing owl burrows shall be avoided and will not be disturbed unless it is verified that either the birds have not begun egg-laying and incubation or the juveniles from the occupied burrows are foraging independently and are capable of independent survival without further parental care. If burrowing owl avoidance is not feasible, the project applicant shall implement additional mitigation measures, such as passive relocation, in consultation with CDFW, to minimize potential impacts to the species.

Level of Significance after Mitigation: With the implementation of Mitigation Measure BR-1, BR-2, and BR-3 this impact would be less than significant.

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

Less than Significant

The stormwater basin was completely dry at the time of the site visit and did not contain a large community of riparian plants aside from a few flat sedges near the basin's outfall grate. Hydrological features are present within the vicinity of the project site which include Turner Ditch, an agricultural canal owned and maintained by the Riverdale Irrigation District that is coterminous with the project's northern border. Turner Ditch is disturbed and lacks any water and vegetation at the time of the site visit. Other agricultural water bodies include Murphy Slough, located approximately 1,000 ft. north of the project, Riverdale Ditch, which is an underground canal running through the project area, and Burrel Ditch, which is located approximately 2,000 ft south of the project area. As mentioned previously, the project site is

disturbed and developed. No riparian habitat or other sensitive natural communities are present. Therefore, the impact is less than significant.

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

No impact.
There are no state or federally protected wetlands within the project area. Therefore, the project would have no impact.

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

Less than Significant Impact with Mitigation Implemented
Migratory birds and resident wildlife may incidentally occur in the project area. The agricultural fields may provide foraging habitat for migratory birds, and the high school campus may provide foraging for other wildlife such as raccoons, foxes, coyotes, and birds of prey. Furthermore, migratory birds may use trees on site as nesting habitat. The implementation of the project would have a significant impact.

In addition to the implementation of Mitigation Measure BR-1, the following additional mitigation measures shall be implemented.

Mitigation Measure BR-4: General Wildlife Impact Mitigation. Excavation work deeper than 2' should include a means of escape for wildlife, such as using a plywood ramp or a similar structure. Trapped animals should be allowed to leave on their own; however, if the animal is not able to, the California Department of Fish and Wildlife shall be contacted for assistance with removing the animal.

All trash is disposed of and stored properly to avoid attracting animals that may pass through the site.

Level of Significance after Mitigation: With the implementation of Mitigation Measures BR-1, BR-2, BR-3, and BR-4, this impact would be less than significant.

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

No Impact
This project would not conflict with any local policies or ordinances protecting biological resources. There would be no impact.

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

No Impact
There is no adopted Habitat Conservation Plan, Natural Conservation Community Plan, or similar plan that would conflict with the proposed project. There would be no impact.

5. Cultural Resources

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Cause a substantial adverse change in the significance of a historical resource pursuant to State CEQA Guidelines § 15064.5?			X	
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to State CEQA Guidelines § 15064.5?		X		
c. Disturb any human remains, including those interred outside of formal cemeteries?		X		

A Cultural Resource Inventory and Evaluation report was prepared for this project by Applied EarthWorks, Inc. and is included in Appendix C of this Initial Study. The study provides a summary of the project regulatory and environmental setting for both pre-contact and historical resources, study methods, findings, historic resource evaluations, and management recommendations. This Initial Study incorporates information and analysis from this report to evaluate potential impacts to Cultural Resources.

Regulatory Setting

Under CEQA, lead agencies must assess whether discretionary projects could significantly impact cultural resources. A significant impact occurs if a project would substantially alter or damage a historical resource—defined as a building, site, structure, object, or district with historical, cultural, architectural, archaeological, or scientific value (14 CCR §15064.5[b]). Such resources are those listed in or eligible for listing in the California Register of Historical Resources (CRHR). If adverse effects cannot be avoided, mitigation is required to reduce harm to the resource's significance (PRC §21083.2[c]), and these measures must be enforceable (14 CCR §15064.5[b][4]).

For this Initial Study, a cultural resource includes archaeological sites or historical-era properties (typically 45 years or older). Whether a resource is considered "historical" depends on its eligibility for the CRHR based on established significance criteria (14 CCR §15064.5[a]).

Would the project:

a. Cause a substantial adverse change in the significance of a historical resource pursuant to State CEQA Guidelines Section 15064.5?

Less than Significant Impact

The project would involve demolition or modification of four historic-era buildings or facilities (defined as 45 years of age or older): the Riverdale High School Stadium, the Baseball and Softball Practice Field, the north parking lot Restroom Facility, and the Pump Building. A Cultural Resources Inventory and Evaluation Report was prepared for the project (see Appendix C), which evaluated each structure/facility for eligibility for listing in the California Register of Historical Resources (CRHR).

Based on the findings in Appendix C, none of the historic-era buildings or facilities proposed for demolition or modification were found eligible for CRHR listing. In addition, the concession stand and agricultural barn that would also be demolished by the project were determined to be less than 45 years old and therefore not subject to CRHR eligibility evaluation.

As documented in Appendix C and summarized above, the project would not result in a substantial adverse change to the significance of any historical resource under CEQA Guidelines Section 15064.5. Therefore, impacts related to historical resources would be less than significant.

b. Cause a substantial adverse change in the significance of an archeological resource pursuant to State CEQA Guidelines Section 15064.5?

Less than Significant Impact with Mitigation Incorporated

As documented in the *Cultural Resource Inventory and Evaluation* (Appendix C), the cultural field survey identified one pre-contact artifact (a handstone isolate) and several historic-era materials (glass shards) on the earthen berms of the stadium. The presence of these materials, combined with the unknown origin of the imported fill used to construct the berms between 1942 and 1950, indicates an elevated potential for the presence of additional cultural resources within the berm soils that could be disturbed during excavation.

In the northern farmland portion of the project area, ground visibility was limited due to dense vegetation. Although this area has been previously disturbed by agricultural activities, it remains undeveloped. Farming often displaces but does not entirely destroy subsurface archaeological deposits. As such, there is potential for both pre-contact and historic-era archaeological resources to remain intact within this area.

In consultation with the Santa Rosa Rancheria Tachi Yokut Tribe, tribal representatives indicated that the area encompassing modern-day Riverdale is considered sensitive for the presence of tribal cultural resources. Appendix C provides a brief overview of the pre-contact history of the Tachi Yokuts, a southern Valley Yokuts-speaking people with longstanding historical, cultural, and spiritual ties to the Tulare Lake region. Given this context, and the history of pre-contact occupation in the area, the potential for unanticipated discovery of tribal archaeological resources is considered likely.

Based on the findings in Appendix C and as discussed in Section 16 *Tribal Cultural Resources*, the project has the potential to cause a significant adverse impact to archaeological resources. However, with implementation of the following mitigation measures, impacts would be reduced to a less than significant level.

Mitigation Measure CULT-1 Full-Time Archaeological Monitoring. Due to the known sensitivity of the Project area, a qualified archaeologist shall monitor ground-disturbing activities during all phases of the proposed Project. The archaeologist will coordinate with the Tribal monitor, construction contractor, and RJUSD representatives to determine the grading schedule, sensitivity training needs, and procedures to follow if inadvertent finds are discovered. Monitoring shall continue until all ground-disturbing activities for each phase are complete or as otherwise agreed upon in writing by the project archaeologist, Tribal representative(s) (assumed to be the Santa Rosa Rancheria Tachi Yokut Tribe), and RJUSD.

RJUSD shall contract with a qualified firm to ensure an archaeological monitor will be on site during all ground-disturbing activities in areas of high concern. These activities include:

- Excavation of the existing soil berm of the stadium;
- Trenching or excavation for utilities deeper than 1.5 foot below the existing ground surface in all Project areas;
- Excavation of the stormwater basin;
- Initial earthwork for the multi-use athletics fields in undeveloped farmland, until soil import activities have concluded; and
- All earthwork for the agricultural barn in undeveloped farmland.

The archaeological monitor shall have the authority to temporarily halt or redirect construction activities if potentially significant cultural resources are encountered. If such resources are identified, all earthwork in the vicinity shall cease, and Mitigation Measures (MM) CULT-5 and TC-3 shall be implemented.

Mitigation Measure CULT-2 Part-Time Archaeological Monitoring. In addition to CULT-1, areas of moderate concern shall also be monitored by a qualified archaeologist who, in coordination with the Tribal monitor, will conduct periodic spot-check monitoring of earthwork activities including:

- Grading for the redevelopment of the stadium;
- Grading for the redevelopment of the parking lot;
- Grading for the redevelopment of South Hazel Avenue; and
- Grading of the multi-use athletics fields, after soil import has concluded.

The frequency and schedule of spot-check monitoring shall be determined in consultation with the Tribal monitor/representative prior to the start of construction, based on the sensitivity of the area and the scope of ground disturbance. The archaeological monitor shall have the authority to temporarily halt or redirect construction activities if potentially significant cultural resources are encountered. If any potentially significant cultural resources are discovered, all work in the vicinity area shall cease, and MM CULT-5 and TC-3 shall be implemented.

Mitigation Measure CULT-3 Worker Environmental Awareness Program. A Worker Environmental Awareness Program shall be conducted prior to any ground-disturbing activities. The purpose of the training is to educate the construction crew and establish protocols for treating unanticipated cultural resource finds. The project archaeologist shall provide cultural resources awareness training to all construction personnel. This training will include descriptions of the types of resources that may be found in the Project area, the protocols to be used in the event of an unanticipated discovery, provide contact information for the archaeological firm and the monitoring Tribe, and identify the laws protecting significant archaeological and historical resources. The archaeological firm will coordinate with the monitoring Tribe to include any additional concerns in the workers environmental training program presentation to temporarily provide information to construction personnel should a representative not be immediately available to provide the Tribal training in MM TC-3. Such concerns could include Assembly Bill 52 (AB 52) requirements, laws and regulations, respect for Tribal requests, the ability to temporarily redirect construction traffic by both cultural monitors, and any other concerns as applicable.

The training may be provided via a pre-recorded video or given on site by the archaeologist as needed and will be conducted in coordination with the Tribal training required in MM TC-5, and attendance shall be documented by sign-in sheets or equivalent verification. Documentation shall be submitted to the District

prior to the commencement of ground disturbance and included in reports prepared pursuant to MM CULT-6.

For the purposes of this measure, "construction personnel" includes contractors, subcontractors, equipment operators, laborers, and supervisory staff engaged in or overseeing ground-disturbing activities. The term does not include delivery drivers, vendors, furniture installers, or other workers whose on-site presence is limited to short-term tasks outside of ground-disturbance areas. This training requirement applies only during the period in which ground-disturbing activities occur. Once all earthwork is complete, additional trainings for new personnel is not required.

Mitigation Measure CULT-4 Monitoring Plan. Archaeological and Tribal monitoring methods and procedures shall be documented in a Cultural Resource Monitoring Plan (CRMP). At least 30 days prior to construction of the Project's first phase, the project archaeologist, in coordination with the Tribal monitor, will begin preparing the CRMP. The CRMP shall be approved by the RJUSD at least 5 days prior to the start of construction and a final copy maintained on site throughout construction activities. The CRMP will cover all phases of Project development and, at a minimum, outline the project schedule, define the areas to monitor, identify the roles of the archaeologist and the Tribal monitor/representative, provide contact information, review safety procedures, and discuss the procedures to follow in the event of a cultural resource discovery.

Mitigation Measure CULT-5 Unanticipated Discoveries. If any cultural materials are identified, the archaeologist should temporarily halt the ground disturbance within 100 feet of the find(s) and notify the Tribal monitor and on-site supervisor. The archaeologist, in coordination with the Tribal monitor, shall assess the find to determine if materials are isolated or part of a larger archaeological deposit. If an archaeological site is identified, the resource should be evaluated for significance under CEQA criteria and further treatment measures may be required. The evaluation shall consider the resource's eligibility and its potential as a TCR under PRC Section 21074. If the resource(s) is determined to be a TCR, procedures outlined in the CRMP and MM TC-3 will be followed. Should the discovery be identified as human remains, procedures outlined in California Health and Safety Code 7050.5 will be followed.

Mitigation Measure CULT-6 Monitoring Report. A monitoring report shall be prepared by the project archaeologist within 60 days of completion of all construction monitoring for each phase of Project development. The reports will, at a minimum, describe the methods of monitoring, discuss any cultural resources discovered and how they were managed, include an evaluation of eligibility for the discovered resources, if applicable; provide a list of involved personnel; and provide any additional recommendations if appropriate. Once each report has been finalized, the archaeologist will prepare final digital submissions for RJUSD and the monitoring Tribe. The archaeological firm will also submit digital copies to the SSJVIC.

Level of Significance After Mitigation: With the implementation of Mitigation Measures CULT-1 through CULT-6, impacts would be less than significant.

c. Disturb any human remains, including those interred outside of dedicated cemeteries?

Less than Significant Impact with Mitigation Incorporated

In the unlikely event that subsurface human remains are discovered during construction, Mitigation Measure CULT-5 has been incorporated into the project.

Level of Significance After Mitigation: With the implementation of Mitigation Measure CULT-5, this impact would be less than significant.

6. Energy Resources

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
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		

An Energy Impact Assessment was prepared by Blair, Church & Flynn for the proposed project and is included in Appendix D to this Initial Study. This Initial Study uses information from that analysis to evaluate the proposed project impacts.

Environmental Setting

The State of California uses the second most energy in the United States, behind Texas, due to its large population and economy. However, California is ranked the 4th lowest user of energy per capita in the nation due to its energy efficiency efforts and mild climate. With the state's large size, transportation takes up the largest amount of energy consumption at 42% of total energy usage. Residential, commercial, and industrial energy usage each comprise close to 20% of the state's energy usage (U.S. Energy Information Administration, 2024).

The consumption of non-renewable energy is directly related to air quality and greenhouse gas (GHG) emissions. The demand for fossil fuels from transportation, building operations, and energy generation contributes to the emission of criteria air pollutants and greenhouse gases. These environmental impacts are discussed in detail in Section 3 *Air Quality*, and Section 8, *Greenhouse Gas Emissions,* and the *Air Quality & Greenhouse Gas Impact Analysis* in Appendix A.

Regulatory Setting

The California Building Standards Code (CBC) contains general building design and construction requirements for various safety, access, and energy efficiency standards. These standards are commonly referred to as "Title 24". Title 24 of CBC mandates that new buildings and facilities be designed and constructed following minimum energy efficiency standards for electrical and mechanical systems to ensure that energy is used efficiently by new facilities. Title 24 also includes CALGreen regulations focused on sustainability, energy efficiency, water conservation, and electric vehicles (EV) parking stalls (Division of State Architects, 2025).

Would the project:

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

Less Than Significant Impact

Construction-Related Energy Consumption

Energy consumption during the construction of the proposed project would include fuel use for operating off-road equipment on-site and vehicles traveling to and from the construction site. Appendix D, Table 1, outlines the energy usage levels associated with construction activities. It is estimated that off-road construction equipment would consume 46,919 gallons of diesel fuel, while on-road vehicles would use approximately 8,907 gallons of gasoline and 371 gallons of diesel fuel. In total, fuel consumption throughout the project would amount to about 7,631 million metric British thermal units (MMBTU).

The energy use of construction equipment would be consistent with that of similar land development projects. Therefore, the project is not expected to require the use of equipment that is more energy-efficient than what is typically utilized for comparable developments. Additionally, idling of on-site equipment would be restricted to a maximum of five minutes, following San Joaquin Valley Air Pollution Control District (SJVAPCD) regulations.

Where feasible, on-site construction equipment may incorporate alternative fuels, such as natural gas. The energy consumption associated with construction would be temporary and is not expected to necessitate additional capacity or lead to increased electricity demand during peak periods.

As a result, the construction of the proposed facilities and improvements would not lead to inefficient, wasteful, or unnecessary energy consumption, and impacts would be considered **less than significant**.

Operational Mobile-Source Energy Consumption

Operational mobile-source energy consumption would be primarily associated with trips to and from the project. Fuel uses for total project operational year conditions of 2028 are summarized in Table 2 of Appendix D. The additional vehicle trips associated with the proposed remodeled and new land uses would consume an annual estimated 411 gallons of diesel and 818 gallons of gasoline.

The estimated total fuel usage would equate to the consumption of an estimated 154.90 MMBTU. The proposed project would not result in increased fuel usage that would be considered unnecessary, inefficient, or wasteful. This impact would be considered **less than significant**.

Operational Building-Use Energy Consumption

The long-term operation of the proposed facilities would lead to an increase in electricity and natural gas consumption. However, the buildings would be required to adhere to Title 24 energy efficiency standards, ensuring the incorporation of enhanced insulation, energy-efficient lighting and appliances, low-flow water fixtures, and low water irrigation.

As outlined in Table 3 of Appendix D, once fully built out, the new and remodeled facilities are expected to use approximately 249,625 kilowatt-hours of electricity annually and 954,662 kilo British thermal units of natural gas per year, resulting in a total annual energy consumption of 1,806.38 MMBTU.

By complying with the most up-to-date energy efficiency regulations under Title 24, the project would not be expected to result in unnecessary, wasteful, or inefficient energy use. Consequently, the impact of the project on energy consumption would be considered **less than significant**.

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

Less than Significant Impact with Mitigation Incorporated

As previously discussed, the proposed land uses are not expected to generate excessive or unnecessary vehicle trips. Additionally, the project would not lead to increased fuel consumption that would conflict with existing plans, policies, or regulations aimed at reducing future fuel usage.

California's Energy Efficiency Strategic Plan sets a goal for buildings to achieve net-zero energy consumption in new residential, commercial, and governmental structures. All public-school projects in California must undergo plan review by the Division of the State Architect (DSA) and comply with DSA and California Energy Commission (CEC) Energy Efficiency Standards. These regulations guarantee that educational facilities do not contribute to excessive fuel use or unnecessary energy consumption. Furthermore, the project would implement Mitigation Measure GHG-1, which would prohibit the installation of natural-gas-fueled appliances and building mechanical equipment, resulting in an impact that is less than significant.

Level of Significance After Mitigation: With the implementation of Mitigation Measure GHG-1, this impact would be less than significant.

7. Geology and Soils

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
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-a-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?				X
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?				X
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?		X		

Environmental Setting

Proximity to Earthquake Faults and Seismic Activity

According to the California Geological Survey, the project site's associated parcels are not within an Earthquake Fault Zone, Landslide Hazard Zone, or Liquefaction Hazard Zone (California Geological Survey, 2025). There are no known faults within the project vicinity, with the nearest known fault, the San Andreas Fault, located approximately 49 miles southwest. According to the Fresno County Multi-Hazard Mitigation Plan, seismic activity in Fresno County is relatively low, but the local faults have the potential

to produce high-magnitude earthquakes throughout the County (County of Fresno, 2018). However, the implementation of newer building codes would mitigate the risk of damage from seismic shaking.

Soil Type, Drainage, and Groundwater Levels.
The project Site is underlain by Chino loam, which is a poorly drained soil type, but has low runoff (USDA - Natural Resources Conservation Service, 2024). Groundwater depth can be estimated using data from the California Department of Water Resources' California's Groundwater Live website, (California Department of Water Resources, 2024). A well approximately 2,500 feet to the west last measured a depth to groundwater of 160 feet on March 18, 2024, (California Department of Water Resources, 2024).

Would the project:

a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

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

No Impact
According to the Department of Conservation, California Geologic Survey's *Special Publication 42, Earthquake Fault Zones* and the referenced *Seismic Hazards Program: Alquist-Priolo Fault Hazard Zones* web map, the project site is not near any known active earthquake faults (California Department of Conservation, 2018) (California Department of Conservation, n.d.). Therefore, there would be no impact.

(ii) Strong seismic ground shaking?

Less than Significant
Though the project does not exist over any known earthquake faults, the Fresno County Multi-Hazard Mitigation Plan does note that high-magnitude earthquakes may occur in the area, though at a relatively low frequency. However, the implementation of modern building codes would mitigate the risk of damage from seismic shaking to new construction. There would be a less than significant impact.

(iii) Seismic-related ground failure, including liquefaction?

No Impact
No potential liquefaction hazard has been identified in the Riverdale area (United States Geological Survey 2021). Additionally, the soil and groundwater levels are not conducive to liquefaction (County of Fresno, 2018). There would be no impact.

(iv) Landslides?

No Impact
The Project is located on the valley floor of the Central Valley and not in the vicinity of any elevated geography, such as mounds, hills, cliffs, or mountains. Landslides would not be possible at the project site. Therefore, there would be no impact.

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

Less than Significant Impact

Since the site is not hydrologically connected to Waters of the U.S. (WOTUS), the project would qualify for a Notice of Non-Applicability (NONA) in accordance with State Water Resources Control Board Order 2022-0057-DWQ, California General Permit for Stormwater Discharges from Construction Activity. A NONA ultimately eliminates the requirements for stormwater pollution prevention, only because the project would not pose a threat to WOTUS. Specifically, the project would discharge all flows to an on-site, terminal basin to the north that is adequately sized to capture stormwater runoff from the project site. Regardless, the project would implement measures to minimize erosion damage to the project site during and after construction.

The SJVAPCD administers Regulation VIII related to fugitive dust control requirements for projects larger than one acre. These regulations would require the contractor to implement wind erosion prevention measures over the course of construction. Since the project would be required to comply with and implement these regulations related to erosion control, there would be a less than significant impact.

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

No Impact

According to the California Geological Survey, the project site is not located within any known Earthquake Hazard Zone, Liquefaction Hazard Zone, or Landslide Hazard Zone. There would be no impact.

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

No Impact

The underlying soil type is Chino Loam and is not considered an expansive soil. There would be no impact.

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

No Impact

The project would involve the connection of an on-site sewer system with the public sanitary sewer system owned and operated by the Riverdale Public Utility District. There would be no need for septic tanks or alternative wastewater disposal structures. There would be no impact.

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

Less than Significant with Mitigation Incorporated

The Phase 1 project site is an existing high school campus. The areas of Phase 2 and 3 project site is existing farmland, which is regularly tilled and ripped down to four feet depth. The project site has been previously disturbed, as well as the surrounding areas with no known occurrences of the discovery of paleontological resources. Nevertheless, the possibility remains that the inadvertent or accidental discovery could occur during ground-disturbing construction activities. However, Mitigation Measure

GEO-1, below, would serve to protect the accidental discovery of paleontological resources. As such, the impact is less-than-significant with mitigation incorporated.

Mitigation Measure GEO-1: **Inadvertent Paleontological Resource Discovery.** If paleontological resources are inadvertently discovered during ground-disturbing activities, all work within 50 feet of the discovery shall be halted and the construction supervisor shall immediately notify the District and retain a qualified paleontologist who meets the standards of the Society of Vertebrate Paleontology (Impact Mitigation Guidelines Revision Committee - Society of Vertebrate Paleontology, 2010) to evaluate the find. The paleontologist shall assess the significance of the discovered resource in accordance with CEQA Guidelines Section 15064.5 and SVP guidelines.

If the find is determined to be a significant paleontological resource, the paleontologist shall develop and implement a treatment plan in consultation with the lead agency. The treatment plan may include, but is not limited to, recovery and curation of the resource at an accredited repository, documentation of the find, and preparation of a report summarizing the methods and results of the recovery. Ground-disturbing activities in the vicinity of the discovery shall not resume until the paleontologist determines that the site has been appropriately managed and cleared for continued work.

Level of Significance After Mitigation: With the implementation of Mitigation Measure GEO-1, this impact would be less than significant.

8. Greenhouse Gas Emissions

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

An Air Quality & Greenhouse Gas Impact Analysis report was prepared for this project by Blair, Church & Flynn and is included as Appendix A to this Initial Study. This Initial Study incorporates information and analysis from this report to evaluate Greenhouse Gas (GHG) related project impacts.

Regulatory Background

Federal Regulations

Federal Clean Air Act

The FCAA was initially signed into law in 1970, to attain national air quality standards, or the National Ambient Air Quality Standards (NAAQS). Each state is required to establish and meet its own State Implementation Plans (SIPs). An amendment in 1990 requires states to revise their SIPs or have the federal government establish its own Federal Implementation Plan (FIP) should a state fail to meet its SIP. The U.S. Environmental Protection Agency is responsible for implementing the FCAA, including developing NAAQS.

State Regulations

California Clean Air Act

The California Clean Air Act of 1988 establishes the responsibilities of the Air Resources Board (ARB) of California. These responsibilities include the development of the California Ambient Air Quality Standards, which are more encompassing and stringent than the national standards (i.e., the NAAQS). Additionally, the CCAA requires that the ARB oversee regionalized air quality control districts to ensure they achieve their ambient air quality standards.

Air Resources Board – 2017 and 2022 Scoping Plan

The Air Resources Board (ARB) adopted Scoping Plans in 2017 and 2022, which address emission reduction targets set by SB 32 and AB 1279, respectively. The 2017 scoping plan's goal is to reduce emissions 40% below 1990 emissions by 2030 (California Air Resources Board, 2022). The 2022 Scoping Plan builds upon the 2017 plan by aiming for carbon neutrality by 2045 (California Air Resources Board, 2022). Both plans discuss measures and strategies to help achieve these goals.

Regional Regulations

San Joaquin Valley Air Pollution Control District (SJVAPCD) Climate Action Plan

The SJVAPCD's Climate Change Action Plan (CCAP) was released in 2009 and discusses the SJVAPCD's thresholds for significance for GHG impacts. The CCAP based its requirements on the Air Resources Board's (ARB's) original scoping plan in 2008 (San Joaquin Valley Air Pollution Control District, 2009). The CCAP, therefore, states that a project's impact is less than significant if a project's GHG emissions are 29% less than Business as Usual emissions. BAU emissions are GHG emissions modeled to occur in 2020, based on a 3-year average (2002-2004). The 29% reduction standard is the difference between 2020 BAU emissions to 1990 levels. The ARB's most recent scoping plan sets a goal of achieving 40% emission reductions below the 1990 levels by 2030. A consistency analysis was performed to show that the project is consistent with the 2022 Climate Change Scoping Plan's 40% below 1990 emissions goal, and the project is therefore consistent with the SJVAPCD's CCAP 1990 emissions goal.

Local

Fresno Council of Governments Regional Transportation Plan and Sustainable Communities Strategy

The FCOG's RTP/SCS contains goals that would improve the accessibility and mobility for communities in Fresno County, while also considering the overall impact of transportation on climate change, health, and equity (Fresno Council of Governments, 2024). The project was analyzed by checking the project's consistency with the FCOG's RTP/SCS's goals, as listed in Chapter 4, Implementing the Plan, of this Initial Study.

Fresno Council of Governments Priority Climate Action Plan

The FCOG intends to prepare a comprehensive, regional climate action plan, and the Priority Climate Action Plan (PCAP) is the first component of this process. The FCOG received funding from the federal government through the Inflation Reduction Act of 2022 to develop the PCAP, and its purpose is to inventory greenhouse gas emissions within Fresno County and to propose industry-based reduction measures. FCOG's next step is to develop a Comprehensive Climate Action Plan which will build upon the PCAP. The PCAP does not currently provide a reduction goal like the ARB's 2022 Scoping Plan, but the project will still be analyzed for consistency with the PCAP to ensure the project does not impact any applicable greenhouse gas reduction efforts.

Determination of Significant Impacts

As of May 2025, neither CARB, SJVAPCD, nor the County of Fresno have adopted recommended numerical GHG significance thresholds applicable to development projects for CEQA purposes. Therefore, the methodology for evaluating the project's impacts related to GHG emissions focuses on its consistency with statewide, regional, and local plans that have been adopted to reduce and mitigate GHG emissions. This approach has been deemed appropriate for analyzing a project's GHG impact by the Governor's Office of Land Use and Climate Innovation (LUCI) (formerly the Governor's Office of Planning and Research) and has been upheld in court challenges (Governor's Office of Planning and Research, 2018) (Mission Bay Alliance v. Office of Community Investment & Infrastructure, 2016). This evaluation of consistency with such plans serves as the sole basis for determining the significance of the project's GHG-related impacts on the environment. The project's GHG emissions have been quantified and are included in this Initial Study for informational purposes.

Would the project:

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

Less than significant

Short-Term Construction

As depicted in Table 10 of Appendix A, the construction of the project would generate a total of approximately 644 Metric Tons of CO_2 Equivalent per year ($MTCO_2e$/year). Amortized emissions, when averaged over an assumed 30-year life of the project would total approximately 21.46 $MTCO_2e$/year.

Long-Term Operation

Operational GHG emissions from the facility's estimated operational years of 2026 and 2028 are summarized in Table 11 of Appendix A. With the inclusion of amortized construction-generated emissions, the facility would generate a total of approximately 133.67 $MTCO_2e$/year upon operation of all phases. A majority of the project's GHG emissions, approximately 74.50%, would be associated with energy use. The remaining minority of estimated project GHG emissions would be 11.09% from mobile sources, 8.81 % from waste generation, 3.29% from water use, and 2.34% from area sources.

With the inclusion of Mitigation Measure GHG-1, prohibiting the use of natural gas infrastructure, and compliance with the 2022 Building Energy Efficiency Standards, the impact is considered less than significant.

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

Less than significant impact with Mitigation Incorporated

As previously discussed, compliance with applicable GHG reduction plans would result in a less than significant impact from project-generated GHG emissions. The FCOG has adopted the 2022 Regional Transportation Plan and Sustainable Communities Strategies (RTP/SCS) (Fresno Council of Governments, 2022) and a Priority Climate Action Plan (PCAP) (Fresno Council of Governments, 2024) that include measures to reduce GHG emissions. Additionally, relevant measures aimed at reducing operational GHG emissions are included in the CARB's 2022 Climate Change Scoping Plan (California Air Resources Board, 2023). The project's consistency with these plans is further detailed below.

CARB's 2022 Climate Change Scoping Plan

The 2017 Climate Change Scoping Plan set a goal of reducing statewide GHG emissions to 40% below 1990 levels by 2030, as required by SB 32. On November 16, 2022, the CARB approved the 2022 Scoping Plan for Achieving Carbon Neutrality. This updated plan continues efforts to meet the SB 32 target and builds upon previous strategies by aiming for an 85% reduction in GHG emissions below 1990 levels by 2045.

Key strategies to achieve SB 32's goals include promoting sustainable communities through zero net energy buildings and enhanced transportation options that reduce vehicle miles traveled (VMT). Additional measures focus on increasing the use of low-carbon fuels and cleaner vehicles. Analysis of consistency with measures from the CARB's 2022 Scoping Plan, is discussed in Table 12 in Appendix A.

This consistency analysis demonstrates, the Project is consistent with all applicable measures/actions of the CARB 2022 Scoping Plan, with the addition of Mitigation Measure GHG-1 and AG-1.

FCOG 2022 Regional Transportation Plan and Sustainable Communities Strategies

The FCOG's 2022 RTP/SCS outlines transportation strategies aimed at reducing regional GHG emissions. Based on the rationale in this initial study, the project would not increase vehicle miles traveled (VMT), demonstrating that the project aligns with planned growth and the objectives outlined in the FCOG's 2022 RTP/SCS. Analysis of all relevant measures is shown in Table 13 in Appendix A. As discussed in Table 13, the project is consistent with all applicable goals of the FCOG's PCAP GHG reduction goals.

FCOG Priority Climate Action Plan

The FCOG's PCAP outlines five draft measures for the transportation sector, four for the agricultural sector, ten for the building energy sector, and four for the waste sector. Analysis of consistency with relevant measures is shown in Table 14 in Appendix A. As discussed in Table 13, the project is consistent with all applicable measures and the intent of the FCOG's PCAP GHG reduction measures that do not directly apply to the project.

As previously noted, the proposed project aligns with regional vehicle miles traveled (VMT) reduction targets since it would not increase VMT. However, it does not incorporate Best Management Practices necessary to fulfill its "fair share" in supporting the State's long-term climate objectives, including the 2045 carbon neutrality goal. Therefore, this impact would be considered potentially significant.

Mitigation Measures

> **GHG-1: Natural Gas Prohibition.** Building mechanical equipment and appliances shall be electrically powered. The installation of natural-gas service/infrastructure shall be prohibited.

Significance After Mitigation

Mitigation Measure GHG-1 would prohibit the construction of natural gas infrastructure and the use of natural gas-powered appliances and mechanical systems. This measure would further minimize the project's on-site GHG emissions. With this mitigation in place, and as discussed above, the proposed project would align with CARB's 2022 Climate Change Scoping Plan, and the FCOG's 2022 RTP/SCS, the FCOG's PCAP to contribute its fair share toward achieving the State's carbon neutrality goal by 2045, as outlined in Executive Order B-55-18.

With mitigation, the project's GHG emissions would not result in significant environmental impacts or conflict with applicable GHG reduction policies, plans, or regulations, therefore this impact would be considered less than significant with mitigation incorporated.

9. Hazards and Hazardous Materials

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
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
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

Regulatory Setting

DTSC Evaluation & Cleanup-Up of School Sites

The Department of Toxic Substances Control (DTSC) administers the requirements of Education Code (EDC) Sections 17210, 17213.1, and 17213.2 for school projects that use California Department of Education (CDE) funds. These codes require that a school district prepare a Phase 1 Environmental Site Assessment (ESA) to investigate a proposed school site for potential contamination with hazardous materials and publish the investigation to the public. The *Phase I ESA with Title 5 Environmental Hazardous Review, & Limited Phase II Investigation* completed for the project is included in Appendix E.

Hazardous Material and Waste Handling Regulations

California Health and Safety Code Section 25501(p) defines hazardous material as: "…any material that, because of its quantity, concentration, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or the environment if released into the workplace or the environment. 'Hazardous materials' include, but are not limited to, hazardous substances, hazardous

waste, and any material that a handler or the administering agency has a reasonable basis for believing that it would be injurious to the health and safety of persons or harmful to the environment if released into the workplace or the environment."

Hazardous materials are expected to be handled, used, and disposed of during construction and during operation. State and Federal regulations set rules for hazardous material and waste handling for the project, during construction and afterwards. Such regulations include Title 49 of the Code of Federal Regulations and Title 13 of the California Code of Regulations which set rules for the transport of hazardous materials. Additionally, Chapter 6.95 of the California Health and Safety Code sets rules for the proper management of hazardous materials and wastes onsite during day-to-day operation.

Project construction activities would involve the transport, use, and disposal of hazardous materials including asphalt (petroleum hydrocarbons), gasoline (petroleum hydrocarbons), and Portland Cement (calcium and aluminum silicates). During construction, contractors and sub-contractors would need to meet State and Federal requirements with their day-to-day handling and disposal of hazardous materials.

During Operation, the project site would need to comply with the same State and Federal regulations by which they are currently abiding. The structures that would be constructed would have the same uses as the structures that exist on-site at the time of this impact analysis (e.g., athletic fields, ag barn, and parking lot). Hazardous materials such as, but not limited to, cleaners, paint, paint thinners, gasoline, and automotive fluids are already in use on-site, and the Riverdale Joint Union School District has been implementing necessary best management practices to minimize the risk of hazardous material spills and exposure.

On-Site Hazardous Settings

The District prepared a Phase I Environmental Site Assessment (ESA) with Supplemental Investigations for Title 5 Environmental Hazardous Material Review and a Limited Phase II Investigation for historical agricultural contaminants, which informs this section and is included in Appendix E.

The current land uses at the project site include row crop cultivation (i.e., corn), an existing education ag barn, an existing parking lot, and existing athletic facilities (e.g., stadium). Historical aerial photography show that the project site has been used to cultivate row crops since at least 1937 and presumably earlier. Later historical aerial photographs show Riverdale High School, and its associated stadium and parking lot have been on-site since 1950, and the ag barn since 1984. Additionally, the 1937 aerial photographs show residences and the Riverdale Ditch (irrigation canal) at the project site that are no longer present. These structures have since been demolished and removed, however there is a potential that the surrounding soil may be contaminated from historic use of lead-based paint or termiticide. Soil along the historic alignment of the abandoned and filled-in Riverdale Ditch also has a potential to be contaminated with agricultural chemicals that were focused into the historic irrigation ditch. However limited soil sampling for agricultural chemicals was completed as a part of the Phase I Environmental Site Assessment (ESA) with Supplemental Investigations for Title 5 Environmental Hazardous Material Review and a Limited Phase II Investigation, which found that samples for organochlorine pesticides were not found above laboratory reporting limits.

The State Water Board tracks Leaky Underground Storage Tanks (LUSTs), such as those containing petroleum products, using its GeoTracker website. According to GeoTracker, there are no LUSTs on the project site or within its vicinity (State Water Resources Control Board, 2025).

The Department of Toxic Substances Control (DTSC) tracks cleanup, permitting, enforcement, and investigation efforts at hazardous waste facilities or sites within known contamination or sites where there may be reasons to investigate further; they use their EnviroStor data management system (California Department of Toxic Substances Control, 2025). According to EnviroStor, a Preliminary Environmental Assessment (PEA) was prepared for a neighboring parcel to the west due to the potential for contamination remaining from past agricultural practices. Potential contaminants include Arsenic, dichlorodiphenyldichloroethane (DDD), dichlorodiphenyldichloroethylene (DDE), dichlorodiphenyltrichloroethane (DDT), and polychlorinated biphenyl (PCB). According to the DTSC Approval of Revised Preliminary Environmental Assessment Report issued on July 30, 2007, "neither a release of hazardous material nor the presence of a naturally occurring hazardous material which would pose a threat to public health or the environment under unrestricted land use was indicated at the site […] DTSC concurs […] that no further investigation of the site is required […] " (Department of Toxic Substances Control, 2007). The specific area that was studied is outside the areas of improvement for this project, but the land uses between the two areas are the same—row crop cultivation. Additionally, the Phase I ESA included near surface soil sampling which did not detect any remaining organochloride pesticides and detected low levels of 4,4'-DDE (below the DTSC's screening levels). Arsenic was detected at levels above the DTSC's screening levels; however, the levels of Arsenic are typical for the region from a naturally occurring geological sources and is naturally present at similar concentrations along the west side of the Central Valley.

The District has conducted certified asbestos surveys of all buildings at the site and determined that asbestos was not present in any buildings, include the buildings that would be demolished throughout the course of this project. Copies of these survey reports are available upon request.

Emergency Plans and Evacuations

Fresno County adopted a multi-jurisdictional hazard mitigation plan in 2009, with the most recent version adopted in 2018 (County of Fresno, 2018). Though this plan addresses concerns throughout the Central Valley, there is no specific hazard associated with Riverdale.

The Fresno County Sheriff's Office manages evacuations for the county and has an online GIS map showing road hazards, evacuation order statuses, and road closures throughout the County. The GIS map may reflect evacuation statuses associated with wildfires or other hazards.

Wildfire Risk

CalFire maintains a Fire Hazard Severity Zone map for the State of California. Riverdale is not currently in any fire hazard zones, and the nearest fire hazard zones are approximately 24 miles to west in the Coastal Range and approximately 25 miles to the East in the western Sierra Nevada Foothills (CalFire, 2025)

Would the project:

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

Less than Significant Impact

Project construction activities would involve the routine use and disposal of hazardous materials including asphalt (petroleum hydrocarbons), gasoline (petroleum hydrocarbons), and Portland Cement (calcium and aluminum silicates). Project operational activities would involve the routine use

and disposal of hazardous materials including pesticides, cleaners, and paint. Construction and operational activities would not require the routine transport of hazardous materials.

Though the project would not require the routine transport of hazardous waste, the District would require the project contractors and employees to transport, use, and dispose of hazardous materials following labeled directions and applicable government local, regional, state, and federal regulations. Transportation-related regulations include Title 49 of Code of Federal Regulations and Title 13 of California Code of Regulations. Regulations to ensure proper inventory and storage of hazardous materials and wastes include Chapter 6.95 of California Health and Safety Code.

Implementing existing regulations would ensure that the project would not create a significant hazard to the public or environment related to the use, transport, disposal, accidental release, or handling of hazardous materials, substances, or waste. Impacts would therefore be less than significant.

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

Less than Significant Impact

For reasons discussed in 9.a, the impact of the project 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?

Less than Significant Impact

The project site is less than 500 feet north of Riverdale High School. During normal operation, the District is expected to maintain the Site using potentially hazardous materials such as, but not limited to, pesticides, fertilizers, paint, cleaning fluids, and solvents. However, the District would comply with State and Local regulations to ensure that hazardous materials are properly used, stored, and transported. Impacts would be less than significant.

d. Be located on a site that 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?

No Impact

Searches through the State databases *Geotracker* and *Envirostor* show that there are no identified hazardous materials sites within the vicinity of the project site. Therefore, 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, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

No Impact

The project area is not within an airport land use plan or two miles of a public airport, public-use airport, or private airstrip. Therefore, no impact would occur.

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

Less than Significant Impact

The Riverdale Public Utility District manages the Riverdale Fire Department. The project site would comply with the requirements and guidelines set by the Riverdale Public Utility District. Additionally, the Riverdale Joint Union School District's Safety Department administers school safety. During construction and operation, the project would comply with safety requirements set by the District's Safety Department. Therefore, the 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?

No Impact

There are no potential wildland fire-prone areas near the project. The project would not expose people or structures, either directly or indirectly, to a risk of loss, injury, or death involving wildland fires. Therefore, there would be no impact.

10. Hydrology and Water Quality

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?			X	
b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?			X	
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:			X	
(i) result in 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 resources of polluted runoff; or			X	
(iv) impede or redirect flood flows?				X
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?			X	
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?			X	

Environmental Setting

Federal Regulations

Clean Water Act

The Clean Water Act (CWA) was passed in 1972 to restore and maintain the chemical, physical, and biological integrity of the nation's water, or Water of the United States (WOTUS). Its initial programming focused on permitting point discharges of pollutants from industrial sources and wastewater generators such as municipalities. This permitting system is called the National Pollutant Discharge Elimination System Program (NPDES Program). The CWA was amended in 1987 to regulate point and non-point stormwater discharges to the WOTUS. The 1987 amendment included permitting requirements for construction stormwater discharges, industrial stormwater discharges, and municipal stormwater discharges for municipalities with populations of 10,000 residents or greater. Additionally, Section 303 of the CWA requires states to continually develop lists of impaired water

bodies and to develop Total Maximum Daily Loads (TMDLs) for these waterbodies. TMDLs account for all pollutant sources, including natural sources.

The nearest water body is the Turner Ditch canal, which is adjacent to the existing stormwater basin. The canal is not listed in a Section 303(d) impaired water body list. Additionally, no TMDLs have been established for the water bodies around Riverdale, and no additional TMDLs for the Central Valley have been issued. (Central Valley Regional Water Quality Control Board, 2018)

National Pollutant Discharge Elimination System Program

The National Pollution Discharge Elimination System (NPDES) Program was established by Section 402 of the Clean Water Act and is the program by which permits are issued to dischargers to the WOTUS. The Federal Government, through the Environmental Protection Agency (EPA), issues these NPDES permits to specific dischargers or will issue general permits that similar dischargers may receive coverage. For example, the EPA issues a general permit for Industrial stormwater dischargers and a general permit for Construction stormwater dischargers. Additionally, the EPA issues permitting authority to States where a State may develop their individual or general permits. California is a State with this permitting authority and issues its own Industrial and Construction General Permits.

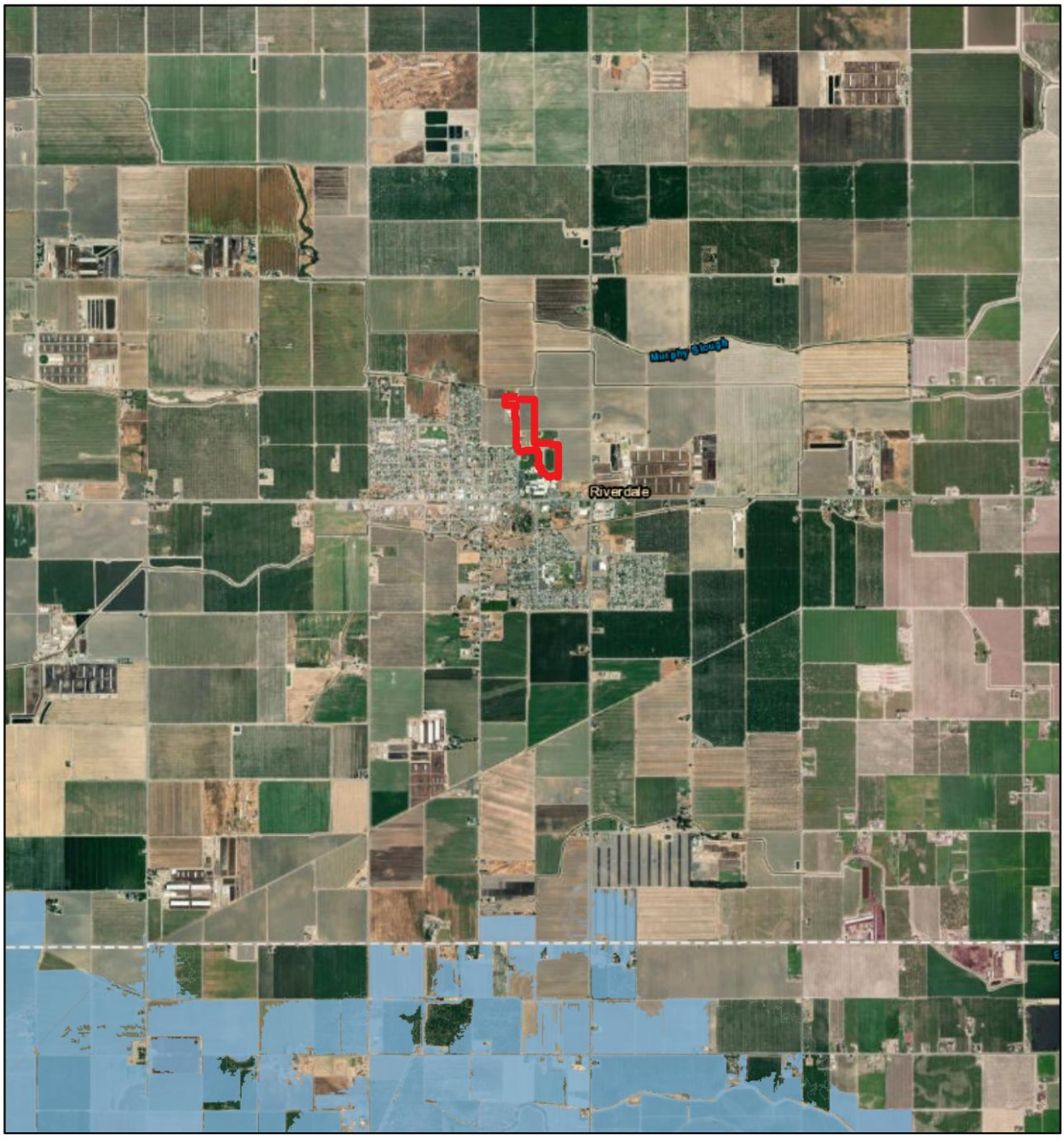
The project site is exempt from the California-issued Construction General Permit as the project is hydrologically disconnected from Waters of the U.S. Additionally, K-12 schools are not required to enroll in coverage under a municipal general permit at the time of this analysis.

Federal Emergency Management Agency

The Federal Emergency Management Agency (FEMA) manages the National Flood Insurance Program (NFIP). The NFIP provides flood insurance to residents and property owners to help recover after a property has been flooded. NFIP assists communities with adopting and enforcing floodplain management policies to reduce potential flood damage; the NFIP was established by the National Flood Insurance Act of 1968. These floodplain management policies apply to Special Flood Hazard Areas (SFHAs), or high-risk flood areas, which are areas that have a 1% chance of being flooded any given year. To better assist communities, the NFIP prepares maps showing areas with high to low flood risk, including SFHAs.

According to the most recent available Flood Insurance Rate Map (FIRM), the project site is not located within any SFHAs or other flood areas (Federal Emergency Management Agency, 2025). A map showing the project location and FEMA 1% flood risk areas are presented below in Figure 7.

Figure 7: FEMA Floodplain Map



State Regulations

Porter-Cologne Water Quality Act

The Porter-Cologne Water Quality Act was enacted in 1969 and created to regulate the water quality of California's surface waters, groundwaters, and wetlands. This Act established the nine Regional Water Quality Control Board and the single State Water Board. One task of the Regional Water Quality Control Boards (RWQCBs) is to establish Basin Plans, which are water quality objectives for waterbodies within their jurisdiction. Another task of the RWQCBs is to establish the CWA Section 303(d) lists of impaired water bodies.

As mentioned previously, there are no waterbody impairments listed for the nearest waterbody, the Turner Ditch Canal.

Sustainable Groundwater Management Act of 2014

The Sustainable Groundwater Management Act (SGMA) requires local agencies to form Groundwater Sustainability Agencies, or GSAs, to locally manage groundwater resources in high and medium-priority groundwater basins. The GSAs develop Groundwater Sustainability Plans (GSPs) to mitigate overdraft within 20 years. However, the State may intervene if the local GSAs have inadequate GSPs.

The project site is located within the San Joaquin Valley – Kings Groundwater Basin, and specifically in the North Fork Kings sub-basin and Groundwater Sustainability Agency (CA Dept. of Water Resources, 2025). This Basin is considered high priority and critically over-drafted (CA Dept. of Water Resources, 2025).

Environmental Settings

Existing Drainage and Receiving Waters

The project site is flat and consists of agricultural fields, an existing Ag Barn, a high school campus with stadium/track/athletic fields, a parking lot, and a road. All developed areas are serviced by storm drains that collect surface runoff into an underground stormwater drainage system, whereas stormwater percolates into the ground or puddles on the surface in the agricultural fields. The existing drainage system conveys flows to the Riverdale High School's stormwater basin located approximately 300 ft north of the maintenance yard. The school's stormwater basin also services the entire existing Riverdale High School. The stormwater basin is hydrologically disconnected from Waters of the U.S. (WOTUS), as in, the project's stormwater would not reach the nearby Turner Canal which could flow into the Kings River, which is a WOTUS.

Would the project:

a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

Less than Significant Impact

The construction of the project is exempt from the California Construction General Permit (CGP), which is the general NPDES permit for construction stormwater discharges. Specifically, the project qualifies for a Notice of Non-Applicability (NONA) because the project is not hydrologically connected to a WOTUS. The project's drainage system is designed to discharge to a terminal stormwater basin that would not overtop

even if during a 100-year, 24-hour storm event, where this 24-hour rain event has a chance of occurring once every 100 years. The stormwater basin would be expanded during Phase 2 allowing the basin to retain stormwater runoff up to the 100-year, 10-day storm event (i.e., approximately a 6" storm event). Therefore, the project would not discharge any pollutants or contaminants to surface waters. Additionally, the project would prevent discharges of contaminants to groundwater by complying with local, State, and Federal regulations, as explained in Section E.9 – Hazards and Hazardous Materials.

For the long-term operation, the project was designed in compliance with the County of Fresno terminal stormwater retention basin standards of providing storage volume up to a 100-year 10-day storm event. The project engineer has completed hydraulic and hydrologic analysis to calculate the additional runoff that would result from additions of impervious surfaces and new stormwater drain inlets, and determined if these additions would overload existing stormwater pipelines and the existing campus stormwater retention basin. This analysis determined that existing stormwater mains are a sufficient size, and that additional stormwater basin volume is required. To comply with Fresno County stormwater retention basin standards, the existing stormwater basin with 7.11 ac-ft storage capacity would be upsized by 5.31 acre-feet to achieve a proposed storage capacity of 12.42 ac-ft of storage capacity. By designing the project stormwater system to County of Fresno standards, the project would not increase stormwater runoff to the Turner Ditch or other water bodies, causing no increase in the risk of erosion and pollution to any receiving water bodies downstream from the Site.

By using a well-sized stormwater basin for each phase of construction and designing the project to County of Fresno stormwater basin standards, and by implementing the regulations described previously in Section E.9 Hazards and Hazardous Materials, the project would result in a less than significant impact on surface and groundwater quality.

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

Less than Significant Impact

As discussed in Section 19 *Utilities and Service* Systems, the project would result in an approximate 27 acre-feet increase in potable water use per year upon full build-out. The overall water demand includes athletics field turf irrigation, landscape irrigation, and building water demand. Based on a Will Serve Letter provided by The Riverdale Public Utility District (RPUD) to the District, the project would not exceed RPUD's water supply and would therefore not deplete groundwater supplies beyond expected levels for the community. Additionally, the project would follow the RPUD's watering schedule to minimize its water demand.

According to the lessees who farm the project site, approximately 5 acre-feet of water is currently used per acre per year for commercial farming. Groundwater is used whenever irrigation canal water is not available. Local irrigation districts typically deliver irrigation canal water for about 3 to 4 months throughout the year. So, groundwater is used approximately 75 percent of the year, meaning that the leased farmland currently uses approximately 3.75 acre-feet of groundwater per acre, per year on average. Approximately 6.5 acres would be converted from commercial farmland to athletics fields, stormwater basin expansion, and the new ag barn facility, therefore approximately 24.38 acre-feet of groundwater would no longer be used for commercial agriculture at full build out. With the estimate that project would require 27 acre-feet of water from RPUD's groundwater wells, the net increase in groundwater usage would be approximately 2.62 acre-feet per year, on average.

Lastly, the project would include the expansion of an existing stormwater basin which would improve the basin's drainage capabilities, therefore improving groundwater recharge after rain events.

For the reasons stated above, the project would have a less than significant impact.

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

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

Less than Significant Impact

The project would implement the requirements of the CGP including the requirement to reduce erosion and siltation. The project's impact 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 offsite;

Less than Significant Impact

As discussed in 10.a, hydraulic and hydrologic analysis has been completed for additional runoff caused by the project. The existing campus stormwater basin would be expanded to minimize the risk of flooding on or off-site. Therefore, the impact would be less than significant.

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

Less than Significant Impact

The project would expand the existing campus stormwater retention basin according to County of Fresno terminal stormwater basin standards. Based on hydraulic and hydrologic analysis, the existing basin would be expanded to provide storage volume greater than a 100-year 10-day storm event. The project's impact would be less than significant.

iv. Impede or redirect flood flows?

No Impact

According to the most recently available FIRM, the project site is not within any SFHAs or other flood hazard areas. Additionally, the project would not modify any known flood areas or conveyances. The project would have no impact.

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

Less than Significant Impact

According to the most recently available FIRM, the project area is not designated as being within a floodplain. Stormwater runoff would be directed to landscaped areas or to the stormwater drainage system, which in turn conveys flows to the project site's stormwater basin. During operation of the facility, no hazardous materials would be stored outdoors or within areas prone to flooding. Therefore, the project would not risk the release of pollutants due to inundation, and impacts would be less than significant.

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

Less than Significant Impact

The project would not conflict with or obstruct the implementation of a water quality control plan or a sustainable groundwater management plan. The local water quality control plan would be the Tulare Basin Water Quality Control Plan (Tulare Basin Plan) issued by the Central Valley Water Quality Control Board. The project would abide by the general guidance and requirements specified in the Tulare Basin Plan, such as preventing discharges of pollutants to receiving waters and the implementation of CGP requirements during construction (Central Valley Regional Water Quality Control Board, 2018). The project would abide by any requirements set by the North Fork Kings GSA and its Groundwater Sustainability Plan (GSP). The project's impact would be less than significant.

11. Land Use and Planning

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
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	

Environmental Settings

The project site's parcels are currently zoned as Limited Agriculture (County of Fresno, 2024). Existing structures on-site include Public Facilities such as a school, athletic fields, a stadium, a parking lot, and an existing ag barn.

Would the project:

a. Physically divide an established community?

No Impact

The project has no design, construction, or operational characteristics that would physically divide Riverdale. There would be no impact.

b. Conflict with any land use plan, policy or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Less than Significant Impact

The designated land use for the project site, according to the Fresno County General Plan, is Limited Agriculture. Public facilities, such as the athletic playfields and educational agricultural barn, may be constructed on Limited Agriculture zoned land with ministerial approval from the Director of Planning and Development (County of Fresno, 2024). As mentioned in the previous analysis, the project would be consistent with the Riverdale Community Plan, where development of a recreational space was planned at the project site. The project would not conflict with the County of Fresno agricultural land use policies as discussed in Section 2, *Agriculture and Forestry Resources*. Since the project would be consistent with the Fresno County General Plan and the Riverdale Community Plan, the impact is less than significant.

12. Mineral Resources

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
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

Environmental Settings

The State of California is required to encourage the conservation and protection of the state's mineral resources per the Surface Mining and Reclamation Act of 1975 (SMARA) (California Department of Conservation, 2024). The nearest SMARA study area is the Fresno Production-Consumption Region which is located approximately 2 miles north of the project site (California Geologic Survey, 2024). This region is known for its production of aggregate materials used to produce cement mixes, which is important to the Central Valley's economy. The nearest active mine to Riverdale is the Chrisman Pit located approximately 30 miles east in Tulare County (California Department of Conservation, 2024).

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?

No Impact

The Census-designated community of Riverdale is not located near any known mineral resources that would be of value to the region and the residents of the State. The nearest active mine for such a resource, aggregate materials, is approximately 30 miles east in Tulare County (California Geological Survey, 2018). The Riverdale Community Specific Plan does not preserve or mention any land that should be preserved for mineral resource recovery (County of Fresno, 2013). The Fresno County General Plan Background Report also does not designate the project area as an area with known mineral resources (County of Fresno, 2000). There would be no impact.

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

No Impact

For reasons stated in 12.a., the project would have no impact.

13. Noise

Would the project result in:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 a private airstrip or 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

Environmental Settings

Local Regulations

Riverdale is an unincorporated community and does enforce its own set of noise control ordinances. However, Chapter 8.40 – Noise Control of the County of Fresno Code of Ordinances (Fresno County Noise Control Ordinance) provides definitions and regulation pertaining to noise limits. As Riverdale is an unincorporated community within Fresno County, the Fresno County Noise Control Ordinance is effectively the local noise control regulation.

Sensitive Receptors

The County's ordinance does not explicitly define "sensitive receptors," though it does specify that noise level measurements are to be taken within 50 feet of specific structures: residences, schools, hospitals, churches, and public libraries (County of Fresno, 2024). Sensitive Receptors associated with this project would include the private residences surrounding the Stathem Street and S. Hazel Avenue intersection to the southwest, and the educational facilities at Riverdale High School.

***Noise Limits/*Thresholds**

The Noise Control Ordinance provides noise limits for both exterior and interior noise levels. See Tables 8 and 9 below for exterior and indoor noise limits provided by the County's noise ordinance, Section 8.40.040 and 8.40.050:

Table 8
County of Fresno Exterior Noise Standards

Category	Cumulative Number of minutes in any one-hour time period	Noise Level Standards, dBA	
		Daytime, 7am – 10pm	Nighttime, 10pm – 7am
1	30	50	45
2	15	55	50
3	5	60	55
4	1	65	60
5	0	70	65

Table 9
County of Fresno Interior Noise Standards

Category	Culminative Number of minutes in any one-hour time period	Noise Level Standards, dBA	
		Daytime, 7am – 10pm	Nighttime, 10pm – 7am
1	5	45	35
2	1	50	40
3	0	55	45

Interior noise levels are the levels of noise heard from inside a residence, where the noise origin is outside the residence.

Exemptions to the Noise Control Ordinance

The ordinance also provides exemptions to limits for school and construction activity. According to Section 8.40.060 of the Fresno Code of Ordinances, activities conducted in public or private school grounds, including but not limited to school athletic and school entertainment events are exempt; and noise sources associated with construction, provided such activities do not take place before 6 a.m. or after 9 p.m. on any day except Saturday or Sunday, or before 7 a.m. or after 5 p.m. on Saturday or Sunday; shall be exempt from the provisions of the noise control ordinance.

Noise Sources – Existing and New

The three separate phases of the project would not produce new types of permanent noise sources. All phases would be consistent with the existing land uses; the stadium and parking lot would continue to be used as they have been, the new playfields would be a part of an existing athletic complex that includes baseball and softball fields, the new ag barn would replace an existing ag barn (and be moved further away from nearby residences), and reconstruction of Hazel Avenue would continue use as a school road. Noise sources associated with the stadium, parking lot, athletic facilities, ag barn, and Hazel Avenue, such as landscaping equipment, athletic events, and traffic, would not significantly increase and would be far enough from sensitive receptors to not create a public nuisance. Additionally, any noise associated with activity at public school grounds is exempt from the Fresno County Noise Ordinance.

Noise generated from construction is expected to be intermittent and temporary. Temporary noise would occur during the project's construction phase, and the noise associated with specific equipment is expected to occur occasionally during construction. See Table 10 below, provided by the Federal Highway Administration, which shows maximum noise levels associated with different equipment.

Table 10
Noise Levels Associated with Common Construction Equipment

Equipment Type	Maximum Noise Level at 50 feet
Backhoes	80
Compactor (ground)	80
Cranes	85
Dozers	85
Dump Trucks	84
Excavators	85
Flat Bed Trucks	84
Front-end Loaders	80
Graders	85
Impact Pile Drivers	95
Jackhammers	85
Pick-up Truck	55
Pneumatic Tools	85
Pumps	77
Rock Drills	85
Rollers	85
Scrapers	85
Tractors	84

Noise from construction equipment such as Graders, Dozers, Trucks, Scrapers, Generators, and Backhoes can generate noise in excess to the County of Fresno's noise limits, however, construction activity is exempt from the Fresno County Noise Control Ordinance so long as construction activity occurs during the specified timeframe (i.e., 6 AM through 9 PM).

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?

Less than Significant Impact

Ambient noise levels would be increased temporarily during construction while equipment and machinery is operated. However, these increases would be temporary and intermittent and would only occur over the course of construction. Noise associated with specific equipment would occur occasionally throughout the construction phase. Additionally, construction activity would occur during the hours of 6 AM and 9 PM and would be exempt from the Fresno County Noise Control Ordinance.

The project would not include any new operational activity that would increase noise levels beyond the noise levels that exist at the Site already. Additionally, some aspects of the project would be constructed further away from Sensitive Receptors (e.g., the new educational ag barn). The new playfields would be

consistent with existing land uses (i.e., baseball and softball fields) and would not produce new sources of noise. The County's noise ordinance provides exemptions to noises associated with activities at public school facilities, including athletic and entertainment events, which are events expected to create the most noise by the project's operation.

The project would result in less than significant impacts.

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

Less than Significant Impact

Project construction would not include any activities that are typically considered vibration intensive, such as blasting or pile driving. Any vibration-intensive activities would be short-term, intermittent, and limited to the specific location along the area that is under construction at a given time. The project would not include new or increased operational activity or associated groundborne vibration or groundborne noise level increases. Therefore, the project would result in less than significant impacts.

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?

Less than Significant Impact

The project site is not located within the vicinity of a private airstrip or an airport land use plan or within two miles of a public airport or public use airport. It also would not include any facilities that would draw in new residents or workers. Therefore, the project would not expose people residing or working in the project area to excessive noise levels related to air traffic and there would be no impact.

14. Population and Housing

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Induce substantial unplanned population growth either in an area, 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

Background

2020 U.S. Census

Riverdale is a Census-Designated Place (CDP). According to the United States Census of 2020, Riverdale's population was 3,477, including 980 housing units with an average household size of 3.75 (United States Census Bureau, 2025). No housing units exist on the project site, nor would the project divide existing neighborhoods.

Would the project:

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

No Impact

This project does not propose new homes or businesses; therefore, it would not directly encourage unplanned population growth in the area. Additionally, this project would involve the construction of new public school athletics and specialized education facilities that do not increase student capacity and would not indirectly encourage substantial unplanned population growth. There would be no impact.

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

No Impact

This project would not necessitate the demolition of existing homes and therefore would not require replacement housing. There would be no impact.

15. Public Services

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities or need for new or physically altered government 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?				X
(ii) Police Protection?				X
(iii) Schools?				X
(iv) Parks?				X
(v) Other public facilities?				X

a. Would the project result in substantial adverse physical impacts associated with the provision of new or altered governmental facilities, need for new or 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 following public services: fire protection, police protection, schools, parks, and other public facilities?

No Impact

The following Public Services are available to the project site and would not be impacted by the project:

Fire Protection: The project site is served by the Fresno County Riverdale Volunteer Fire Department Station, which is administered by the Riverdale Public Utilities District. All facilities would be constructed following the 2022 California Building Standards Code related to fire safety.

Police Protection: The project site is served by the Fresno County Sheriff's Department.

Schools: The project would include existing athletic facilities, which are owned and maintained by the Riverdale Joint Union School District.

Parks: Fresno County Public Works and Planning Department owns and maintains regional parks throughout Fresno County. The nearest regional park is Laton-Kingston Park, which is approximately 9 miles to the east in Laton, CA.

Other Public Facilities: The project would construct new structures that would replace old structures. However, these new structures would not significantly impact the demand for Fire Protection and Police Protection that would require new or altered facilities. The project would also not induce

additional population growth which would require new and altered schools, parks, or other public facilities. Therefore, there would be no impact.

16. Recreation

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Would the project increase the use of existing neighborhood or 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

Riverdale currently has no public parks available within its boundary. The County of Fresno owns and maintains several regional parks throughout the county, but the nearest Fresno County regional park is the Laton-Kingston Regional Park in Laton, CA, approximately 9 miles to the east. Kings County also owns and maintains regional parks such as Hickey Park, which is approximately 6 miles southeast of the Site.

a. Would the project 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?

No Impact

The project has no housing element that would increase the number of residents in Riverdale. There would be no increased use of the nearby regional parks. There would be no impact.

b. Does the project include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?

No Impact

The project would expand the existing recreational facilities at Riverdale High School. The current population of Riverdale is 2,690 based on the projections of the latest US Census estimates (released May 2024). The last official US Census in 2020 recorded the population at 2,727. The project would serve the existing school study body and the local community as a quasi-public recreation facility. There would be no impact.

17. Transportation

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 section 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	

Environmental Setting

Local Transportation Plans

The 2024 Fresno County Regional Active Transportation Plan (Fresno ATP) was developed by the Fresno Council of Governments and approved on May 30, 2024. The plan is a joint effort between the municipalities of Fresno County to describe and plan active transportation projects to address the region's active transportation needs. Active transportation includes but is not limited to walking, biking, and roller skating.

The 2022 Fresno County Regional Transportation Plan & Sustainable Communities Strategy (Fresno RTP) was also developed by the Fresno Council of Governments and approved on July 28, 2022. The Fresno RTP describes current and proposed public transportation projects to keep the residents of the County connected.

Would the project:

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

Less than Significant Impact

The project Site is located along the west side of S. Hazel Avenue, north of Mt. Whitney Avenue. The Site's stormwater and utility improvements include work along S. Hazel Avenue. until it terminates at Turner Ditch. The 2022 Fresno RTP does not propose any improvements to any road within Riverdale, though it does propose an increase in transportation services to the region. However, the 2024 Fresno ATP proposes intersection improvements to the intersection of Stathem Street. and S. Hazel Avenue (Fresno Council of Governments, 2024). The intersection was already improved during the 2018-19 school year

(Riverdale Joint USD, 2025). The project site would meet any requirements set by the County of Fresno regarding roadway improvements and would therefore be in accordance with the 2024 Fresno ATP.

The nearest transit stop is a bus stop for the Fresno County Rural Transit Agency (FCRTA) located approximately 0.3 miles southeast of the project Site. This serves a transit route along Mt. Whitney Rd. Project improvements would not interfere with the transit route nor the transit stop.

The project would involve replacement of existing utilities under Hazel Avenue from Stathem Street to the Turner Ditch canal. There is a single sidewalk on Hazel Avenue on its east side, though it terminates at Stathem Street and does not continue further north. The Stathem/Hazel cross-section may be closed temporarily during construction, though school access and athletic facility access would be allowed (where construction is not occurring) during this temporary closure.

Properties north of Stathem Street include farmland and existing Riverdale Joint Unified School District facilities; there is no through traffic north of Stathem Street. Any road closures along Hazel Ave. resulting from project construction would not impact pedestrian access, transit facilities, pedestrian facilities, or bicycle access. Temporary impacts would be expected during construction for a small portion of the eastern Hazel Avenue sidewalk, but school and residential access would be possible. Therefore, there would be a less than significant impact.

b. Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

Less than Significant Impact

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

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

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

The Fresno Council of Governments prepared the Fresno County SB 743 Implementation Regional Guidelines (FCOG VMT Guidelines) to assist member agencies in analyzing projects for VMT. According to these guidelines, a project can screen out of VMT analysis if it meets certain criteria. This project consists of improvements to existing athletic facilities at schools, the addition of new playfields for community use, and the replacement of an old ag barn with a new Ag Barn for educational use at the existing Riverdale High School. Chapter 3 of the FCOG VMT Guidelines describe projects that may be presumed to create a less than significant impact, which include "the development of institutional/government and

public service uses that support community health, safety, and welfare […]" (Fresno Council of Governments, 2021).

The addition of new playfields would support the community's health and welfare as it would provide space for recreation. Riverdale residents would also be provided with an alternative recreation space that is not located in a separate community 6 to 9 miles away (see Section 3.16 *Recreation*). Additionally, the educational Ag Barn would serve the community as an improved educational space for its students. According to the FCOG VMT Guidelines, the project can screen out of the VMT analysis.

In conclusion, the project would 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)?

Less than Significant Impact

The project would involve the development of Hazel Avenue and of the Riverdale High School Stadium parking lot. The proposed designs for Hazel Avenue and the parking lot have similar layouts to the existing road and parking lot. Hazel Avenue would be used in the same way as it was before, and there would be no incompatible uses added because of this project. The project would have a less than significant impact.

d. Result in inadequate emergency access?

Less than Significant Impact

The proposed project may result in temporary road closures due to construction. However, road closures would occur along Hazel Avenue during utility installation and replacement. The project would abide by the requirements of the Riverdale Joint Unified School District's Safety Department and the local Fire Department and Sheriff's Office. The project's impact would be less than significant.

18. Tribal Cultural Resources

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in the Public Resource Code § 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 the Public Resources Code § 5020.1(k)?			**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 Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe?		**X**		

A Cultural Resource Inventory and Evaluation report was prepared for this project by Applied EarthWorks, Inc. and is included in Appendix C of this Initial Study. This study provides a summary of the project regulatory setting and environmental setting for both pre-contact and historical resources, study methods, findings, historic resource evaluations, and management recommendations. This Initial Study incorporates information and analysis from this report to evaluate potential impacts to Tribal Cultural Resources.

A search of the Native America Heritage Commission (NAHC) S*acred Lands Files* was completed in January 2025 by Blair, Church & Flynn Consulting Engineers. Outreach letters were sent by the District to all tribes listed on the NAHC contact list. Two responses were received, one from the Table Mountain Rancheria with no concerns, and one from the Santa Rosa Rancheria Tachi-Yokut Tribe expressing concern and included requested mitigation measures. Responses to this email began formal consultation between the District and the SRR. A compilation of the *Sacred Lands Files* search results, tribal notification letters, and received responses are included in Appendix F.

Formal tribal consultation with the SRR is still ongoing. The District intends to continue to consult with the SRR on appropriate mitigation measures to protect TCR's and invites both public and private comments from the SRR regarding the protection of tribal cultural resources. The District is committed to engaging in dialogue to address any concerns and to reach a consensus with the SRR prior to issuing a Notice of Determination.

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) Rupture 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)?

Less than Significant Impact

According to a completed *Sacred Land Files* Search and CHRIS records search, and the findings of the *Cultural Resource Inventory and Evaluation* report in Appendix C, the project site does not include and is not near any listed or eligible CRHR sites or registered local historical resources. Therefore, there would be a less than significant impact.

(ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

Less than Significant Impact with Mitigation Incorporated

On April 17, Samantha McCarthy, Cultural Specialist for the Santa Rosa Rancheria (SRR) Tachi-Yokut Tribe responded to the District stating that they have concerns regarding the proposed project. The District and the SRR then engaged in formal consultation via a meeting on May 16, 2025, to discuss potential project impacts to Tribal Cultural Resources (TCRs) and the best methods to mitigate them.

As of the date of publishing this Draft IS/MND, the District and the SRR are still consulting to determine the appropriate mitigation measures to protect potentially present tribal cultural resources from project activities. The mitigation measures outlined in this section are proposed draft measures based on ongoing consultation with the SRR that the District believes would reduce impacts to TRC below a less than significant impact.

Mitigation Measure TC-1 Full-Time Earthwork Tribal Cultural Resource Monitoring. To avoid potential impacts to TCRs, a qualified Tribal monitor from the SRR shall be retained by RJUSD. The Tribal monitor shall be present to observe all ground-disturbing activities in areas of high concern of all phases, including, but not limited to, grading, excavation, trenching, and augering. If a Tribal monitor is temporarily unavailable, earthwork in high-potential areas shall not proceed unless: (a) a Tribal monitor has conducted a pre-activity inspection (spot check) and cleared the work area, or (b) the qualified archaeological monitor required by MM CULT-1 is present on site. The requirement for Tribal monitoring shall be noted on all construction documents for all phases and verified by RJUSD prior to the commencement of ground-disturbing activities for all phases. Monitoring shall continue until all ground-disturbing activities for each phase are complete or as otherwise agreed upon in writing by the Tribal representative(s), project archaeologist, and RJUSD. The areas of high concern include:

- Excavation of the existing soil berm of the stadium;
- Trenching or excavating for utilities deeper than 1.5 foot below the existing ground surface in all Project areas;
- Excavation of the stormwater basin;
- Initial earthwork for the multi-use athletics fields in undeveloped farmland, until soil import activities have concluded; and
- All earthwork for the agricultural barn in undeveloped farmland.

The Tribal monitor shall have the authority to temporarily halt or redirect construction activities if potentially significant TCRs are encountered. If such resources are identified, all earthwork in the vicinity shall cease, and MM TC-3 and CULT-5 shall be implemented.

All phases of earthwork monitoring shall be documented in a CRMP developed in coordination with the SRR and the qualified project archaeologist as required by CULT-4, and maintained on site. Monitoring documentation shall be submitted to the RJUSD upon completion of ground-disturbing activities for each phase (MM CULT-6).

Mitigation Measure TC-2 Spot-Check Earthwork Tribal Cultural Resources Monitoring. In addition to TC-1, areas of moderate concern shall also be monitored by a retained SRR monitor who, in coordination with the archaeologist, will conduct periodic spot-check monitoring of earthwork activities including:

- Grading for the redevelopment of the stadium;
- Grading for the redevelopment of the parking lot;
- Grading for the redevelopment of South Hazel Avenue; and
- Grading of the multi-use athletics fields, after soil import has concluded.

The frequency and schedule of spot-check monitoring shall be determined in consultation with the project archaeologist prior to the start of construction, based on the sensitivity of the area and the scope of ground disturbance. The Tribal monitor shall have the authority to increase the frequency of monitoring if site conditions indicate a higher potential for encountering TCRs. If any potentially significant TCR are discovered, all work in the vicinity area shall cease and MM CULT-5 and TC-3 shall be implemented.

Mitigation Measure TC-3 Unanticipated Discovery of Tribal Cultural Resources. If TCRs including human remains, cultural materials, features, or artifacts, are discovered during ground-disturbing activities, all work within 100 feet of the discovery shall immediately cease. The construction contractor shall immediately notify the construction manager, the Tribal monitor (as identified in TC-1 and TC-2), and the qualified archaeologist as required in CULT-1.
The significance of the discovery shall be evaluated by the qualified archaeologist in consultation with the Tribal monitor. The evaluation shall consider the resource's eligibility for listing in the CRHR and its potential as a TCR under PRC Section 21074.

If the resource is determined to be a TCR or otherwise significant under CEQA, the construction manager shall implement a treatment plan developed in consultation with the SRR Tribal representative(s), the RJUSD, and the qualified archaeologist. The treatment plan may include preservation in place, if feasible, or respectful recovery and reburial in accordance with Tribal protocols. Construction activities may resume in the affected area only after the RJUSD, in consultation with the archaeologist and Tribal representative(s), determines that appropriate mitigation has been implemented.

Mitigation Measure TC-4 Tribal Cultural Resources Curation Agreement. At least 30 days prior to the commencement of any construction activities, the RJUSD shall execute a Curation and Treatment Agreement with the SRR, a California Native American tribe traditionally and culturally affiliated with the Project area.

The agreement shall establish protocols for the respectful treatment, temporary storage, and long-term curation or reburial of any TCRs that may be collected during ground-disturbing or other construction activities where preservation in place is determined not to be feasible pursuant to MM TC-3. The agreement shall include, but not be limited to:

- Recognizing SRR's role as the appropriate entity for determining the treatment and disposition of recovered TCRs;
- Allowing SRR to take possession of recovered materials for reburial or curation in accordance with their customs, protocols, and applicable laws; and
- Providing culturally appropriate documentation that respects the confidentiality and sensitivity of TCRs, consistent with PRC Sections 21083.2 and 21084.3.

Evidence of the executed agreement shall be documented by RJUSD prior to any ground disturbance. Final disposition of any TCRs shall occur in accordance with the terms of the agreement and be documented in the final report for the appropriate phase per MM CULT-6.

Mitigation Measure TC-5 Pre-Construction Tribal Cultural Awareness Training. Prior to any ground-disturbing activities of each phase, RJUSD, in coordination with the Construction Manager, the SRR, and project archaeologist, shall ensure that all construction personnel who are involved in supervising or regularly working within areas of ground disturbance attend a Tribal Cultural Awareness Training conducted by a representative of the SRR. Training shall be conducted in person before ground-disturbing activities commence.

After the initial training and commencement of ground-disturbing activities, any new on-site personnel, either from a current or new construction company, who regularly works within areas of ground disturbance, are also required to attend an in-person Tribal Cultural Awareness Training. Attendance for all Tribal Trainings shall be documented via sign-in sheet, and a copy shall be submitted to RJUSD and the archaeological consultant to include in the report(s) per MM CULT-6. The District will be responsible for all construction personnel taking both the archaeological and Tribal awareness trainings. For the purposes of this measure, "construction personnel" includes contractors, subcontractors, equipment operators, laborers, and supervisory staff engaged in or overseeing ground-disturbing activities. The term does not include delivery drivers, vendors, furniture installers, or other workers whose on-site presence is limited to short-term tasks outside of ground-disturbance areas.

The Tribal Cultural Awareness Training shall inform on-site personnel, at a minimum, of the following:

- Respect for TCRs; This Project area may contain TCRs, which are places or objects of cultural and spiritual importance to the SRR. Protecting these resources is required by law and is a condition of the Project.
- Examples of TCRs, which include the following but are not limited to, stone tools, flakes from tool-making, bone, shell, pottery fragments, hearths, dark soil with organic material, viewsheds, and ancestral remains.
- Legal protections addressing TCRs and their protection under CEQA and Public Resources Code Sections 21083.2 and 21084.3. This must also include that it is illegal to remove, damage, or ignore TCRs.
- Discovery procedures including: (1) If you see anything that looks unusual, stop work immediately in that area and notify the supervisor in charge. (2) The Project Archaeologist

and Tribal Monitor will determine the next steps. (3) Do not touch, move, or collect any potential cultural materials.

- The role of the Tribal Monitor and their presence on site. The SRR monitor represents the Tribe and has authority to stop work if a resource is found. Their instructions must be respectfully followed.

In the event that a SRR representative is not on site to provide the Training, the new personnel must take the archaeological workers environmental training program training in MM CULT-3 and be scheduled to take the SRR Training within 5 days of their first day of work on site.

This training requirement applies only during the period in which ground-disturbing activities occur. Once all earthwork is complete, additional trainings for new personnel are not required.

Level of Significance After Mitigation Incorporated: With the implementation of Mitigation Measures TC-1 through TC-5, impacts would be less than significant.

19. Utilities and Service Systems

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 of which could cause significant environmental effects?			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 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?			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	

Existing Utilities and Systems

Water and Wastewater:

The site's potable water would be provided by the Riverdale Public Utility District (RPUD). The RPUD currently sources its potable water from groundwater sources via wells constructed throughout RPUD's service boundary. The RPUD would provide the site's wastewater disposal services. The RPUD currently owns and operates a Wastewater Treatment Plant (WWTP) northeast of the project site, southeast of the S. Brawley Avenue and W. Cerini Avenue intersection.

Solid Waste:

The RPUD currently contracts with Mid-Valley Disposal to provide Riverdale with a solid waste disposal service.

Stormwater Drainage:

The District owns and operates Stormwater drainage systems at the project site, including surface and underground stormwater conveyance systems. All stormwater runoff collected at the project site is ultimately discharge to the campus stormwater basin at the north end of Hazel Avenue.

Energy:

The project site currently receives electricity and natural gas services from the regulated utility provider, PG&E. Electricity is also provided by a District-owned solar farm located west of the stormwater basin. Estimate energy use and impacts of the proposed project is analyzed in Section 6 *Energy* and Appendix D *Energy Impact Analysis*.

Estimate Project Demand

Wastewater:
New bathroom facilities would be constructed during Phase 1, and wastewater services would be provided to the new Ag Barn in Phase 3. Phase 2 would not require wastewater services. The daily peak wastewater generation of the proposed project is estimated to be 9,000 gpd, and yearly generation is estimated to be 340,000 gallons, with an average of approximately 932 gallons per day. Peak wastewater generation was determined assuming that the stadium is at full capacity and that the ag barn is at full capacity with washdown occurring. Washdown would be cleaning the facilities with water.

Water:
Phase 1 would construct new bathrooms and athletic buildings, which would increase water demand for the project site. Phase 2 would construct new athletic fields and plant turf grass, requiring additional irrigation. Phase 3 would construct the new Ag Barn, which would require a potable water supply. The average annual water use of the proposed project is estimated to be 8,796,339 gallons per year, with peak daily use in July estimated to be 53,800 gallons per day.

Solid Waste:
The project would not increase student capacity at the Riverdale High School campus and would therefore not increase solid waste generation.

Stormwater:
The proposed project would increase stormwater runoff from the site. However, the County of Fresno design standards require that the project site retain stormwater runoff from up to a 100-year, 10-day design storm, which is 6.00" for the project site's location. The site's runoff volume for the design storm is estimated to be 540,888 cubic feet. The expanded stormwater basin would provide 555,957 cubic feet of storage volume.

Energy:
Electricity demand would increase, though more efficient building standards would minimize that increase. PG&E and the District-owned solar farm would meet the project's energy needs.

Would the project:

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

Less than Significant Impact
Water:
The project's water demand would be served by the RPUD and would not result in relocation or upsizing of existing water facilities.

Stormwater:
The project's stormwater drainage would be served by an existing stormwater basin that exists north of the project site. The project includes plans to expand the existing stormwater basin to the south to provide storage volume required to store additional stormwater runoff that would result from the project. The potential impacts caused by expanding the basin are analyzed in previous sections, such

as in the Air Quality, Biological Resources, Greenhouse Gas Emissions, Geology & Soils, Cultural Resources, and Tribal Cultural Resources as well as the technical studies in Appendix A *Air Quality & Greenhouse Gas Impact Analysis*, Appendix *B Biological Resources Assessment* and Appendix C *Cultural Resource Inventory and Evaluation*. Due to potential impacts from earthwork activities to biological, archeological, and tribal cultural resources, MM-BR-1, MM-BR-2, MM CULT-1 through CULT 6 and MM TC-1 through TC-5 would be implemented.

Wastewater:
The project's wastewater output would be collected by existing RPUD wastewater sewer systems and would not result in the expansion or relocation of existing systems.

Solid Waste:
The project would not increase student capacity at the project site and would therefore not increase solid waste generation. The project's solid waste generation would be adequately served by the local solid waste service provider.

Energy:
The project would result in undergrounding of existing overhead electrical lines that span east to west just north of the north campus parking lot. The potential impacts caused by the underground of existing electrical lines are analyzed in previous sections, such as in the Air Quality, Biological Resources, Greenhouse Gas Emissions, Geology & Soils, Cultural Resources, and Tribal Cultural Resources as well as the technical studies in Appendix A *Air Quality & Greenhouse Gas Impact Analysis*, Appendix *B Biological Resources Assessment* and Appendix C *Cultural Resource Inventory and Evaluation*. Due to potential impacts from earthwork activities to biological, archeological, and tribal cultural resources, MM-BR-1, MM-BR-2, MM CULT-1 through CULT 6 and MM TC-1 through TC-5 would be implemented.

The project's demand for Water, Stormwater, Wastewater, Solid Waste, and Energy would not result in the expansion or relocation of existing facilities other than what is described in the project description of this initial study. The potential impacts of the expansion of the existing stormwater basin and the undergrounding of overhead electrical lines have been assessed in this Initial Study. Therefore, through the implementation of MM BR-1, MM BR-2, MM CULT-1 through CULT 6 and MM TC-1 through TC-5 the potential impacts of earthwork activities to biological, archeological, and tribal cultural resources would be less than significant impact.

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

Less than Significant Impact

On August 7, 2025, the RPUD issued a Will Serve Letter stating that the RPUD would be able to provide the project's estimated water usage demand during normal, dry, and multiple dry years. Therefore, the project would have a less than significant impact.

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

Less than Significant Impact

As mentioned in the previous impact analysis, the RPUD issued a Will Serve Letter stating that the RPUD would be able to provide the project's wastewater collection demand, alongside the RPUD's existing commitments. Therefore, the project would have a less than significant impact.

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

Less than Significant Impact

The project would not increase solid waste generation, as discussed previously, and management and reduction statutes and regulations would not apply to the project. The school would remain in compliance with such regulations. Therefore, the impact would be less than significant.

20. Wildfire

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 wildfire or the uncontrolled spread of 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 the 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

Wildfire Hazard

CalFire maintains a Fire Hazard Severity Zone map for the State of California. Riverdale is not currently in any fire hazard zones, and the nearest fire hazard zones are approximately 24 miles to west in the Coastal Range and approximately 25 miles to the East in the western Sierra Nevada Foothills (CalFire, 2025).

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?

Less than Significant Impact

As discussed in Section 3.9 – Hazards and Hazardous Materials, the project would not substantially impair any adopted emergency response plans or emergency evacuation plans. The project would have a less than significant impact.

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

No Impact

The proposed project site is not located in a State Responsibility Area or classified as Very High Hazard Severity Zone. The project would have no impact.

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

No Impact

The project is located on an existing high school campus. A portion of the campus is an existing agricultural field and is surrounded by other agricultural fields. Additionally, the project would not involve the construction of infrastructure in wildfire prone areas and would not require the construction of fuel breaks or roads to maintain any such infrastructure that may result in temporary or ongoing impacts to the environment. The project would have no impact.

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

No Impact

The project site is not located within or near any Wildfire Hazard Zones and would therefore not be at risk of hazards associated with wildfires. There would be no impact.

21. Mandatory Findings of Significance

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 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 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		

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?

Less than Significant Impact with Mitigation Incorporated

This initial study has analyzed the potential impacts of the project on biological, cultural, geological, and tribal cultural resources and has proposed mitigation measures to reduce the potential impacts to these resources to a less than significant level. Specifically, through the implementation of the proposed mitigation measures BR-1, BR-2, CULT-1 through CULT-6, GEO-1, GHG-1, and TC-1 through TC-5, the potential impacts of project to these resources would be less than significant impact with mitigation incorporated. Therefore, with the implementation of the aforementioned mitigation measures, the project would not degrade the quality of the environment, substantially reduce the habitat of a fish and wildlife species, cause fish or wildlife populations 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. The impact would be less than significant with mitigation measures BR-1, BR-2, CULT-1 through CULT-6, GEO-1, GHG-1, and TC-1 through TC-5 incorporated.

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

Less than Significant Impact with Mitigation Incorporated

Based on the information in Sections E-1 through E-20, the proposed project would have a potential impact on Greenhouse Gasses that would be considered individually limited but cumulatively considerable. However, through the implementation of MM GHG-1 this impact would be less than significant with mitigation incorporated.

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

Less than Significant Impact with Mitigation Incorporated

Based on the information in Sections E-1 through E-20, the proposed project could potentially have a substantial adverse effect on human beings concerning greenhouse gases. However, through the implementation of MM GHG-1 this impact would be less than significant with mitigation incorporated.

F. Mitigation, Monitoring, and Reporting Program

1. Purpose

Riverdale Joint Unified School District has prepared this Mitigation Monitoring and Reporting Program to comply with Section 15097 of the State CEQA Guidelines. The purpose of the Mitigation Monitoring and Reporting Program is to ensure the implementation of the mitigation measures identified in this Initial Study.

2. Lead Agency

Riverdale Joint Unified School District will undertake the project and is the Lead Agency for the project. The District is responsible for the implementation of all mitigation measures identified in this Initial Study.

3. Mitigation Monitoring and Reporting Coordinator

The Riverdale Joint Unified School District Superintendent, Facility Services, or designee shall act as the Project Mitigation Reporting Coordinator ("Coordinator").

4. Monitoring and Reporting Procedures for Construction

a. The Coordinator shall provide a copy of all project design-, site clearing- and construction-related mitigation measures to the project architect, engineer, and contractor for incorporation in the project plans, construction specifications, permits, and contracts, as appropriate.
b. Before the awarding of the bid, the Coordinator shall determine that all project design-, site clearing- and construction-related mitigation measures have been incorporated in the project plans, construction specifications, permits, and contracts, as appropriate.
c. During construction, the Coordinator, through the construction management team, shall inspect the project area regularly to ensure all work complies with the mitigation measures. If a discrepancy is not resolved within a reasonable time, the Coordinator may order work to cease until the discrepancy is resolved.
d. Before the District accepts the project improvements, the Coordinator shall certify that the project incorporates all project design and construction-related mitigation measures.

5. Monitoring and Reporting Procedures for Operational and Maintenance

Before the project becomes operational, the Coordinator shall determine that the project's operational plans and procedures incorporate all operations-related mitigation measures.

G. List of Preparers

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Appendix A: Air Quality & Greenhouse Gas Impact Analysis

Appendix B: Biological Resources Evaluation

Appendix C: Cultural Resources Inventory and Evaluation

Appendix D: Energy Impact Analysis

Appendix E: Phase 1 Environmental Site Assessment With Title 5 Environmental Hazardous Review & Limited Phase II Investigation

Appendix F: AB 52 Correspondence Record