

DRAFT INITIAL STUDY AND  
MITIGATED NEGATIVE DECLARATION

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**TENTATIVE TRACT MAP NO. 6493  
PROJECT  
SANGER, CALIFORNIA**



JUNE 2025

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**DRAFT INITIAL STUDY AND  
MITIGATED NEGATIVE DECLARATION**

**TENTATIVE TRACT MAP No. 6493  
PROJECT**



**Consultant:**



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## **NOTICE OF PUBLIC HEARING AND INTENT TO ADOPT A MITIGATED NEGATIVE DECLARATION**

This is to advise that the City of Sanger Planning Division has prepared a Mitigated Negative Declaration for the Project identified below that is scheduled to be heard at the City of Sanger Planning Commission Meeting on **July 24, 2025**.

PLEASE BE ADVISED that the City of Sanger will consider the Mitigated Negative Declaration at the Planning Commission meeting to be held on July 24, 2025. Presentations will be made at approximately 6:00 PM. Action on items on the Planning Commission agenda will occur after the presentations. The meeting will be held in the Council Chambers of City Hall located at 1700 7<sup>th</sup> Street, Sanger, CA 93567. The City of Sanger City Council will take final action to approve or deny a General Plan Amendment, Prezone, and initiation of Annexation upon recommendation by the Planning Commission. A public hearing for the City Council shall be held at a later date.

### ***Project Name***

Tentative Tract Map (TTM) No. 6493

### ***Project Location***

The Project is located on an approximately 78-acre site consisting of two parcels (Assessor Parcel Number [APN]: 322-020-18S and 322-020-08) located within the City of Sanger (City) Sphere of Influence (SOI). The proposed site is generally bounded by Annadale Avenue to the north and North Avenue to the south. The site is located within Section 21, Township 14S, Range 22E, Mount Diablo Base and Meridian (MDB&M), of the Sanger U.S. Geological Survey (USGS) Quad Map.

### ***Project Description***

The Project proposes a 530-lot single-family residential subdivision (TTM 6493) and a neighborhood park. The Project site is located outside the city limits and will require annexation of the site from the County of Fresno into the City of Sanger.

On- and off-site improvements including internal circulation roads, interior local streets, curb, gutter, sidewalk, and landscaping are proposed. Water and sewer utilities will be provided by the City. The site is currently designated as Residential Medium Density and Park/Open Space by the Sanger General Plan Land Use Map.

The Project is proposed to be developed in two phases. Phase 1 will consist of 38.9 acres (net 32.5 acres) and will be developed with 269 single-family residential lots and a neighborhood park. The first phase will contain various lot sizes with the minimum lot size at 2,782 square feet. Phase 2 will consist of 39.8 acres (net 35.6 acres) that will be developed with 261 single-family residential lots. Lot sizes in the second phase will vary with the minimum lot size at 3,768 square feet.

The following discretionary entitlements are required for the proposed Project:

- Annexation into the City of Sanger initiated by City Council approved by the Fresno Local Agency Formation Commission (LAFCo)
- Approval of TTM 6493
- Approval of a General Plan Amendment to change approximately 14.27 acres of Park and Open Space to Medium Density Residential.
- Approval of a Prezone to R-1-6 (Single-Family Residential District) and RSC (Recreation, School, and Conservation District)
- Approval of a Conditional Use Permit (CUP) for a Planned Unit Development to allow reduced lot sizes, reduced setbacks and deviations from the development standards of the R-1-6 Zone District.

The document and documents referenced in the Initial Study/Mitigated Negative Declaration are available for review at the Council Chambers of City Hall located at 1700 7th Street, Sanger, CA 93567.

As mandated by the California Environmental Quality Act (CEQA), the public review period for this document was 30 days (CEQA Section 15073[b]). The public review period began on June 24, 2025, and ended on July 23, 2025. For further information, please contact Jaymie Brauer at (661) 616-2600 or [jaymie.brauer@qkinc.com](mailto:jaymie.brauer@qkinc.com).

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## LIST OF ACRONYMS AND ABBREVIATIONS

AADT	Annual Average Daily Traffic
AB	Assembly Bill
ALUCP	Airport Land Use Compatibility Plan
APN	Assessors Parcel Number
AQP	Air Quality Plan
BAU	Business As Usual
BE	Biological Evaluation
BMP	Best Management Practices
BPS	Best Performance Standards
CalGEM	California Geologic Energy Management Division
CALGreen	California Green Building Standards Code
CARB	California Air Resources Board
CBC	California Building Code
CCE	California Candidate Endangered
CDFW	California Department of Fish and Wildlife
CE	California Endangered
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CFP	California Fully Protected
CHRIS	California Historical Resources Information System
CO	Carbon Monoxide
CO2e	Carbon Dioxide equivalent emissions
COG	Council of Governments
CR	California Rare
CREC	controlled RECs
CRHR	California Register of Historical Resources
CSC	California Species of Concern
CT	California Threatened
CUP	Conditional Use Permit
CWA	Clean Water Act
DPM	Diesel Particulate Matter
DPR	Department of Parks and Recreation
DTSC	Department of Toxic Substances Control
EIR	Environmental Impact Report
EMFAC	Emission Factor model
EPA	Environmental Protection Agency
ESA	Environmental Site Assessment
FC	Federal Candidate
FCMHMP	Fresno County Multi-Hazard Mitigation Plan
FE	Federally Endangered
FHWA	Federal Highway Administration
FMMP	Farmland Mapping and Monitoring Program
FPT	Federal Proposed Threatened

FT	Federally Threatened
FTA	Federal Transit Administration
g/idle-hr	grams per idle hour
g/VMT	grams per vehicle miles traveled
GAMAQI	Guidance for Assessing and Mitigating Air Quality Impacts
GHG	Greenhouse Gas
GWh	millions of kilowatts per hour
HC	Hydrocarbon
HCD	Housing and Community Development
HFC	hydrofluorocarbons
HI	Hazard Index
HREC	historical RECs
IS	Initial Study
ITE	Institute of Transportation Engineers
Ldn	Day-Night Average Level
Leq	hourly energy average
Lmax	hourly energy maximum
LOS	Level of Service
LRA	Local Responsibility Area
mBTU	millions of therms
MDB&M	Mount Diablo Base and Meridian
MEI	Maximally Exposed Individual
MG	million gallons
mg/kg-day	milligram per kilogram-day
mgd	million gallons per day
MND	Mitigated Negative Declaration
mph	miles per hour
MPO	Metropolitan Planning Organizations
MRZ	Mineral Resource Zone
MTCO <sub>2e</sub> /year	Metric Tons of Carbon Dioxide Equivalent per year
NAHC	Native American Heritage Commission

## **MITIGATED NEGATIVE DECLARATION**

As Lead Agency under CEQA, the City of Sanger Planning Division has reviewed the Project described below to determine whether it could have a significant effect on the environment because of its development. In accordance with CEQA Guidelines Section 15382, “[s]ignificant effect 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.

### ***Project Name***

Tentative Tract Map No. 6493 Project

### ***Project Location***

The Project is located on an approximately 78-acre site consisting of two parcels (Assessor Parcel Number [APN]: 322-020-18S and 322-020-08) located within the City of Sanger (City) Sphere of Influence (SOI). The proposed site is generally bounded by Annadale Avenue to the north and North Avenue to the south. The site is located within Section 21, Township 14S, Range 22E, Mount Diablo Base and Meridian (MDB&M), of the Sanger U.S. Geological Survey (USGS) Quad Map.

### ***Project Description***

The Project proposes a 530-lot single-family residential subdivision (TTM 6493) and a neighborhood park on an approximately 78-acre Project site in the SOI of the City of Sanger (City). The Project site is located outside the city limits and will require annexation of the site from the County of Fresno into the City of Sanger city limits. On- and off-site improvements including external circulation roads, interior local streets, curb, gutter, sidewalk, and landscaping are proposed. Water and sewer utilities will be provided by the City. The site is currently designated as Residential Medium Density and Park/Open Space in the Sanger Land Use Map.

The Project is proposed to be developed in two phases. Phase 1 will consist of 38.9 acres (net 32.5 acres) and will be developed with 269 single-family residential lots and a neighborhood park (approximately 3.23 acres). The first phase will contain various lots sizes with the minimum lot size at 2,782 square feet. Phase 2 will consist of 39.8 acres (net 35.6 acres) that will be developed with 261 single-family residential lots. Lot sizes in the second phase will vary with the minimum lot size at 3,768 square feet.

The following discretionary entitlements are required for the proposed Project:

- Annexation into the City of Sanger initiated by City Council and approved by the Fresno Local Agency Formation Commission (LAFCo)

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- Approval of a Prezone to R-1-6 (Single-Family Residential District) and RSC (Recreation, School, and Conservation District)
- Approval of a Conditional Use Permit (CUP) for a Planned Unit Development to allow reduced lot sizes, reduced setbacks and deviations from the development standards of the R-1-6 Zone District.

Full buildout of the residential area will take approximately two years after approval and the necessary permits are issued. It is anticipated that the following pieces of equipment would be used during construction activities:

- Roller
- Loaded trucks
- Excavator
- Generator
- Service truck
- Air compressor

The document and documents referenced in the Initial Study/Mitigated Negative Declaration are available for review at the Council Chambers of City Hall located at 1700 7th Street, Sanger, CA 93567.

As mandated by the California Environmental Quality Act (CEQA), the public review period for this document was 30 days (CEQA Section 15073[b]). The public review period began on June 24, 2025, and ended on July 24, 2025. For further information, please contact Jaymie Brauer at (661) 616-2600 or [jaymie.brauer@qkinc.com](mailto:jaymie.brauer@qkinc.com).

***Mailing Address and Phone Number of Contact Person***

City of Sanger, Planning Division  
1700 7<sup>th</sup> Street  
Sanger, CA 93657  
Contact Person: Derek Sylvester  
Phone: (559) 876-6300 x1540

## **Findings**

As Lead Agency, the City of Sanger, Planning Division finds that the Project will not have a significant effect on the environment. The Environmental Checklist (CEQA Guidelines Appendix G) or Initial Study (IS) (*see Section 3 - Environmental Checklist*) identified one or more potentially significant effects on the environment, but revisions to the Project have been made before the release of this Mitigated Negative Declaration (MND) or mitigation measures would be implemented that reduce all potentially significant impacts less-than-significant levels. The Lead Agency further finds that there is no substantial evidence that this Project would have a significant effect on the environment.

## **Mitigation Measures Included in the Project to Avoid Potentially Significant Effects**

**MM BIO-1:** Prior to ground-disturbing activities, a qualified wildlife biologist shall conduct a biological clearance survey between 14 and 30 days prior to the onset of construction.

The clearance survey shall include walking transects to identify presence of San Joaquin kit fox, burrowing owl, nesting birds, and other special-status species. The pre-construction survey shall be walked by no greater than 30-foot transects for 100 percent coverage of the Project and a 50-foot buffer, where feasible. If no evidence of special-status species is detected, no further action is required except MM BIO-7 shall be implemented. A copy of the pre-construction survey report shall be submitted to the lead agency as evidence of compliance.

**MM BIO-2:** The following avoidance and minimization measures shall be implemented during all phases of the Project to reduce the potential for impact from the Project. They are modified from the U.S. Fish and Wildlife Service Standardized Recommendations for Protection of the Endangered SJKF Prior to or During Ground Disturbance (USFWS 2011, Appendix F).

- a. All food-related trash items such as wrappers, cans, bottles, and food scraps shall be disposed of in securely closed containers. All food-related trash items such as wrappers, cans, bottles, and food scraps shall be disposed of in securely closed containers and removed at least once a week from the construction of the Project site.
- b. Construction-related vehicle traffic shall be restricted to established roads and predetermined ingress and egress corridors, staging, and parking areas. Vehicle speeds shall not exceed 20 miles per hour (mph) within the Project site.
- c. To prevent inadvertent entrapment of kit fox or other animals during construction, the contractor shall cover all excavated, steep-walled holes or trenches more than two feet deep at the close of each workday with plywood or similar materials. If holes or trenches cannot be covered, one or more escape ramps constructed of earthen fill or wooden planks shall be installed in the trench. Before such holes or trenches are filled, the contractor shall thoroughly inspect them for entrapped animals. All

construction-related pipes, culverts, or similar structures with a diameter of four inches or greater that are stored on the Project site shall be thoroughly inspected for wildlife before the pipe is subsequently buried, capped, or otherwise used or moved in any way. If at any time an entrapped or injured kit fox is discovered, work in the immediate area shall be temporarily halted, and USFWS and CDFW shall be consulted.

- d. Kit foxes are attracted to den-like structures such as pipes and may enter stored pipes and become trapped or injured. All construction pipes, culverts, or similar structures with a diameter of four inches or greater that are stored at a construction site for one or more overnight periods shall be thoroughly inspected for kit foxes before the pipe is subsequently buried, capped, or otherwise used or moved in any way. If a kit fox is discovered inside a pipe, that section of pipe shall not be moved until the USFWS and CDFW have been consulted. If necessary, and under the direct supervision of the biologist, the pipe may be moved only once to remove it from the path of construction activity until the fox has escaped.
- e. No pets, such as dogs or cats, shall be permitted on the Project sites to prevent harassment, mortality of kit foxes, destruction of dens.
- f. Use of anti-coagulant rodenticides and herbicides in project sites shall be restricted. This is necessary to prevent primary or secondary poisoning of kit foxes and the depletion of prey populations on which they depend. All uses of such compounds shall observe labels and other restrictions mandated by the U.S. Environmental Protection Agency, California Department of Food and Agriculture, and other State and federal legislation, as well as additional Project-related restrictions deemed necessary by the USFWS and CDFW. If rodent control must be conducted, zinc phosphide shall be used because of the proven lower risk to kit foxes.
- g. A representative shall be appointed by the Project proponent who will be the contact source for any employee or contractor who might inadvertently kill or injure a kit fox or who finds a dead, injured, or entrapped kit fox. The representative shall be identified during the employee education program, and their name and telephone number shall be provided to the USFWS.
- h. The Sacramento Fish and Wildlife Office of USFWS and CDFW shall be notified in writing within three working days of the accidental death or injury to a SJKF during Project-related activities. Notification must include the date, time, and location of the incident or of the finding of a dead or injured animal and any other pertinent information. The USFWS contact is the Chief of the Division of Endangered Species at the addresses and telephone numbers below. The CDFW contact can be reached at (559) 243-4014 and R4CESA@wildlifeca.gov.
- i. All sightings of the SJKF shall be reported to the California Natural Diversity Database (CNDDDB). A copy of the reporting form and a topographic map clearly marked with the location of where the kit fox was observed shall also be provided to the Service at the address below.

- j. Any Project-related information required by the USFWS or questions concerning the above conditions or their implementation may be directed in writing to the U.S. Fish and Wildlife Service at: Endangered Species Division, 2800 Cottage Way, Suite W 2605, Sacramento, California 95825-1846, phone: (916) 414-6620 or (916) 414-6600.
- k. New sightings of SJKF should be reported to the CNDDDB.

**MM BIO-3:** Within 14 days prior to the start of Project ground-disturbing activities, a pre-activity survey with a 500-foot buffer shall be conducted by a qualified biologist knowledgeable in the identification of these species and approved by the CDFW. If dens/burrows that could support any of these species are discovered during the pre-activity survey conducted under MM BIO-1, the avoidance buffers outlined below should be established. No work would occur within these buffers unless the biologist approves and monitors the activity.

San Joaquin Kit Fox

- Potential or Atypical den – 50 feet
- Known den – 100 feet
- Natal or pupping den – 500 feet, unless otherwise specified by CDFW

**MM BIO-4:** If construction is planned outside the nesting period for raptors (other than burrowing owl) and migratory birds (February 15 to August 31), no mitigation shall be required. If construction is planned during the nesting season for migratory birds and raptors, a pre-construction survey to identify active bird nests shall be conducted by a qualified biologist to evaluate the site and a 250-foot buffer for migratory birds and a 500-foot buffer for raptors. If nesting birds are identified during the survey, active raptor nests shall be avoided by 500 feet and all other migratory bird nests shall be avoided by 250 feet. Avoidance buffers may be reduced if a qualified on-site monitor determines that encroachment into the buffer area is not affecting nest building, the rearing of young, or otherwise affecting the breeding behaviors of the resident birds. Because nesting birds can establish new nests or produce a second or even third clutch at any time during the nesting season, nesting bird surveys shall be repeated every 30 days as construction activities are occurring throughout the nesting season.

No construction or earth-moving activity shall occur within a non-disturbance buffer until it is determined by a qualified biologist that the young have fledged (left the nest) and have attained sufficient flight skills to avoid project construction areas. Once the migratory birds or raptors have completed nesting and young have fledged, disturbance buffers will no longer be needed and may be removed, and monitoring may cease.

A copy of the pre-construction survey report shall be submitted to the lead agency as evidence of compliance.

**MM BIO-5:** A qualified biologist shall conduct a pre-construction survey on the project site and within 500 feet of its perimeter, where feasible, to identify the presence of the western burrowing owl. The survey shall be conducted between 14 and 30 days prior to the start of construction activities. If any burrowing owl burrows are observed during the pre-construction survey, avoidance measures shall be consistent with those included in the CDFW Staff Report on Burrowing Owl Mitigation (CDFG 2012). If occupied burrowing owl burrows are observed outside of the breeding season (September 1 through January 31) and within 250 feet of proposed construction activities, a passive relocation effort may be instituted in accordance with the guidelines established by the California Burrowing Owl Consortium (1993) and the California Department of Fish and Wildlife (2012). During the breeding season (February 1 through August 31), a 500-foot (minimum) buffer zone shall be maintained unless a qualified biologist verifies through non-invasive methods that either the birds have not begun egg laying and incubation or that juveniles from the occupied burrows are foraging independently and are capable of independent survival.

In addition, impacts to occupied burrowing owl burrows shall be avoided in accordance with the following table unless a qualified biologist approved by CDFW verifies through non-invasive methods that either: (1) the birds have not begun egg laying and incubation; or (2) that juveniles from the occupied burrows are foraging independently and are capable of independent survival.

Location	Time of Year	Level of Disturbance		
		Low	Med	High
Nesting Sites	April 1 – Aug 15	200 m	500 m	500 m
Nesting Sites	Aug 16 – Oct 15	200 m	200 m	500 m
Nesting Sites	Oct 16 – Mar 31	50 m	100 m	500 m

**MM-BIO-6:** If construction work occurs after August 30 and ends before March 1 (outside of the breeding season), impacts to the Swainson's hawk would be avoided. Surveys would not be required for work conducted during this part of the year, and no further mitigation for nest disturbance is required.

1. Protocol Surveys. For work that begins between March 1 and August 30, a qualified biologist with expertise in Swainson's hawk shall conduct protocol surveys of potential nesting habitat within 0.5 mile of any construction activities prior to initiation of such activities. The project applicant shall conduct a protocol-level survey in conformance with the "Recommended Timing and Methodology for Swainson's Hawk Nesting Surveys in California's Central Valley," Swainson's Hawk Technical Advisory Committee (TAC) (<https://www.wildlife.ca.gov/conservation/survey-protocols#377281284-birds>)

(May 31, 2000) hereby incorporated by reference. This protocol prescribes minimum standards for survey equipment, mode of survey, angle and distance to tree, speed, visual and audible clues, distractions, notes and observations, and timing of surveys.

A written report with the pre-construction survey results must be provided to the Planning Department and CDFW within 30 days of the commencement of construction-related activities. The report shall include: the date of the report, authors and affiliations, contact information, introduction, methods, study location, including map, results, discussion, and literature cited.

If the required protocol surveys show there are no active Swainson's hawk nests within the 0.5-mile of construction activities, then no further mitigation for nest disturbance will be required. If protocol surveys show that there are no active Swainson's hawk nests within 10 miles of the site, then no further mitigation for foraging impacts will be required.

2. Nest Avoidance. If nesting Swainson's hawks are observed within 0.5-mile of the project site during the protocol surveys, the project applicant must implement CDFW pre-approved mitigation measures to avoid nest impacts during construction. These measures include:
  - a. All project-related activities with the potential to cause nest abandonment or forced fledging of young shall be avoided until the young have fledged.
  - b. If disturbances, habitat conversions, or other project-related activities, that may cause nest abandonment or forced fledging, are necessary, within the nest protection buffer zone (0.5-mile), monitoring of the nest site by a qualified raptor biologist, funded by the project applicant, shall be required to determine if the nest is abandoned. If the nest is abandoned, but the nestlings are still alive, the project proponent is required to fund the recovery and hacking, that is the controlled release of captive reared young, of the nestling.
  - c. The project applicant shall be required to coordinate with CDFW to determine if project activities with the potential to cause disturbance to nesting Swainson's hawks within the 0.5-mile buffer may proceed with a reduced nest buffer and an approved biological monitor. CDFW may authorize a reduced nest buffer with the presence of a monitoring biologist during construction activities to ensure that the nest is not disturbed. Routine disturbances such as agricultural activities, commuter traffic, and routine maintenance activities within 0.5-mile of an active nest are not prohibited.

**MM BIO-7:** Prior to ground-disturbance activities, or within one week of being deployed at the Project site for newly hired workers, all construction workers at the Project site shall attend a Construction Worker Environmental Awareness Training and Education Program developed and presented by a qualified biologist.

The Construction Worker Environmental Awareness Training and Education Program shall be presented by the biologist and shall include information on the life histories of special-status wildlife and plant species that may be encountered during construction activities, their legal protections, the definition of “take” under the Endangered Species Act, measures the project operator is implementing to protect the species, reporting requirements, specific measures that each worker must employ to avoid take of the species, and penalties for violation of the Act. Identification and information regarding special status or other sensitive species with the potential to occur on the Project site shall also be provided to construction personnel. The program shall include:

- An acknowledgment form signed by each worker indicating that environmental training has been completed.
- A copy of the training transcript and/or training video/CD, as well as a list of the names of all personnel who attended the training and copies of the signed acknowledgment forms, shall be maintained on-site for the duration of construction activities.

**MM CUL-1:** If prehistoric or historic-era cultural materials are encountered during construction activities, all work in the immediate vicinity of the find shall halt until a qualified archaeologist can evaluate the find and make recommendations. Cultural resource materials may include prehistoric resources such as flaked and ground stone tools and debris, shell, bone, ceramics, and fire-affected rock, as well as historic resources such as glass, metal, wood, brick, or structural remnants. If the qualified archaeologist determines that the discovery represents a potentially significant cultural resource, additional investigations may be required to mitigate adverse impacts from Project implementation. These additional studies may include avoidance, testing, and evaluation or data recovery excavation. Implementation of the mitigation measure below would ensure that the proposed Project would not cause a substantial adverse change in the significance of a historical resource.

**MM CUL-2:** In the event that buried prehistoric archaeological resources are discovered during excavation and/or construction activities, construction shall stop in the immediate vicinity of the find and a qualified archaeologist shall be consulted to determine whether the resource requires further study. The qualified archaeologist shall make recommendations to the developer and City on the measures that shall be implemented to protect the discovered resources, including but not limited to excavation of the finds and evaluation of the finds in accordance with Section 15064.5 of the CEQA Guidelines.

If the resources are determined to be unique prehistoric archaeological resources as defined under Section 15064.5 of the CEQA Guidelines, mitigation measures shall be identified by the monitor and required to the developer and City. Appropriate measures for significant resources could include avoidance or capping, incorporation of the site in green space, parks, or open space, or data recovery excavations of the finds. No further grading shall occur in the area of the discovery until the lead agency approves the measures to protect these resources.

Any prehistoric archaeological artifacts recovered as a result of mitigation shall be provided to a City-approved institution or person who is capable of providing long-term preservation to allow future scientific study.

**MM CUL-3:** If human remains are discovered during construction or operational activities, further excavation or disturbance shall be prohibited pursuant to Section 7050.5 of the California Health and Safety Code. The specific protocol, guidelines, and channels of communication outlined by the Native American Heritage Commission, in accordance with Section 7050.5 of the Health and Safety Code, Section 5097.98 of the Public Resources Code (Chapter 1492, Statutes of 1982, Senate Bill 297), and Senate Bill 447 (Chapter 44, Statutes of 1987), shall be followed. Section 7050.5(c) shall guide the potential Native American involvement, in the event of a discovery of human remains, at the direction of the county coroner.

**MM GEO-1:** If any paleontological resources are encountered during ground-disturbance activities, all work within 25 feet of the find shall halt until a qualified paleontologist, as defined by the Society of Vertebrate Paleontology Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources (2010), can evaluate the find and make recommendations regarding treatment. Paleontological resource materials may include resources such as fossils, plant impressions, or animal tracks preserved in rock. The qualified paleontologist shall contact the Natural History Museum of Los Angeles County or another appropriate facility regarding any discoveries of paleontological resources.

If the qualified paleontologist determines that the discovery represents a potentially significant paleontological resource, additional investigations and fossil recovery may be required to mitigate adverse impacts from Project implementation. If avoidance is not feasible, the paleontological resources shall be evaluated for their significance. If the resources are not significant, avoidance is not necessary. If the resources are significant, they shall be avoided to ensure no adverse effects, or such effects must be mitigated. Construction in that area shall not resume until the resource-appropriate measures are recommended, or the materials are determined to be less than significant. If the resource is significant and fossil recovery is the identified form of treatment, then the fossil shall be deposited in an accredited and permanent scientific institution. Copies of all correspondence and reports shall be submitted to the Lead Agency.

**MM HAZ-1:** In the event unknown underground storage tank(s) are uncovered or damaged during excavation or grading activities, all work in that area shall cease. The State Water Resources Control Board (SWRCB) and the Fresno County Environmental Health Division shall be contacted to determine what appropriate remediation may be required, and to identify the appropriate requirements and approvals. A report of all communication and the determination made by the SWRCB and the County Health Division shall be submitted to the City.

**MM HAZ-2:** In the event an unknown septic system is uncovered or damaged during excavation or grading activities, all work in that area shall cease. The Fresno County Environmental Health Division shall be contacted to determine what appropriate

remediation may be required, and to identify the appropriate requirements and approvals. A report of all communication and the determination made by the County Health Division shall be submitted to the City.

**MM HAZ-3:** In the event unknown water wells are uncovered or damaged during excavation or grading activities, all work in that area shall cease. The California Department of Water Resources and the California State Water Resources Control Board shall be contacted to determine what appropriate abandonment or remediation may be required, and to identify the appropriate requirements and approvals. A report of all communication and the determination made by the State agencies shall be submitted to the City.

**MM NSE-1:** Added as a note on TTM 6394, air conditioning or mechanical ventilation shall be installed in the units so that it will be possible for windows and doors to remain closed for sound insulation purposes to avoid exceeding City of Sanger interior noise thresholds.

## **SECTION 1 - INTRODUCTION**

### **1.1 - Overview**

Lennar Homes of California (Applicant) proposes to amend the City General Plan to designate an approximately 14.27 acre portion of the Project site from the Park and Open Space land use designation to Medium Density Residential, and a prezone of the site to R-1-6 (Single-Family Residential District) and RSC (Recreation, School, and Conservation District) to allow development of a 530-lot single-family subdivision and a neighborhood park on an approximately 78-acre Project site. The Project is located in the City's Sphere of Influence in Fresno County and will require annexation of the site into City limits. Figure 1-1 is a map of the regional location, and Figure 1-2 shows the Project location.

### **1.2 - California Environmental Quality Act**

The City of Sanger is the Lead Agency for this Project pursuant to the CEQA Guidelines (Public Resources Code Section 15000 et seq.). The Environmental Checklist (CEQA Guidelines Appendix G) or Initial Study (IS) (see *Section 3 – Initial Study*) provides analysis that examines the potential environmental effects of the construction and operation of the Project. Section 15063 of the CEQA Guidelines requires the Lead Agency to prepare an IS to determine whether a discretionary Project will have a significant effect on the environment. A Mitigated Negative Declaration (MND) is appropriate when an IS has been prepared, and a determination can be made that no significant environmental effects will occur because revisions to the Project have been made or mitigation measures will be implemented that reduce all potentially significant impacts to less-than-significant levels. The content of an MND is the same as a Negative Declaration, with the addition of identified mitigation measures and a Mitigation Monitoring and Reporting Program (MMRP) (see *Section 6 – Mitigation Monitoring and Reporting Program*).

Based on the IS, the Lead Agency has determined that the environmental review for the proposed application can be completed with an MND.

### **1.3 - Impact Terminology**

The following terminology is used to describe the level of significance of impacts.

- A finding of “no impact” is appropriate if the analysis concludes that the Project would not affect a topic area in any way.
- An impact is considered “less than significant” if the analysis concludes that it would cause no substantial adverse change to the environment and requires no mitigation.
- An impact is considered “less than significant with mitigation incorporated” if the analysis concludes that it would cause no substantial adverse change to the environment with the inclusion of environmental commitments that have been agreed to by the applicant.

- An impact is considered “potentially significant” if the analysis concludes that it could have a substantial adverse effect on the environment.

#### **1.4 - Document Organization and Contents**

The content and format of this Initial Study/Mitigated Negative Declaration (IS/MND) is designed to meet the requirements of CEQA. The report contains the following sections:

- *Section 1 – Introduction:* This section provides an overview of CEQA requirements, intended uses of the IS/MND, document organization, and a list of regulations that have been incorporated by reference.
- *Section 2– Project Description:* This section describes the Project and provides data on the site’s location.
- *Section 3 – Initial Study:* This section contains the evaluation of 21 different environmental resource factors contained in Appendix G of the CEQA Guidelines. Each environmental resource factor is analyzed to determine whether the proposed Project would have an impact. One of four findings is made which include: no impact, less-than-significant impact, less than significant with mitigation, or significant and unavoidable. If the evaluation results in a finding of significant and unavoidable for any of the 21 environmental resource factors, then an Environmental Impact Report will be required.
- *Section 4 – List of Preparers:* This section identifies the individuals who prepared the IS/MND.
- *Section 5 – Bibliography:* This section contains a full list of references that were used in the preparation of this IS/MND.
- *Section 6 – Mitigation Monitoring and Reporting Program:* This section contains the Mitigation Monitoring and Reporting Program.

#### **1.5 - Incorporated by Reference**

The following documents and/or regulations are incorporated into this IS/MND by reference:

- 2035 Sanger General Plan
- City of Sanger General Plan Update Draft Focused Environmental Impact Report (EIR)
- City of Sanger Zoning Ordinance (Chapter 20)
- City of Sanger 2020 Urban Water Management Plan
- Fresno County Airport Land Use Compatibility Plan
- Fresno County Hazard Mitigation Plan 2024

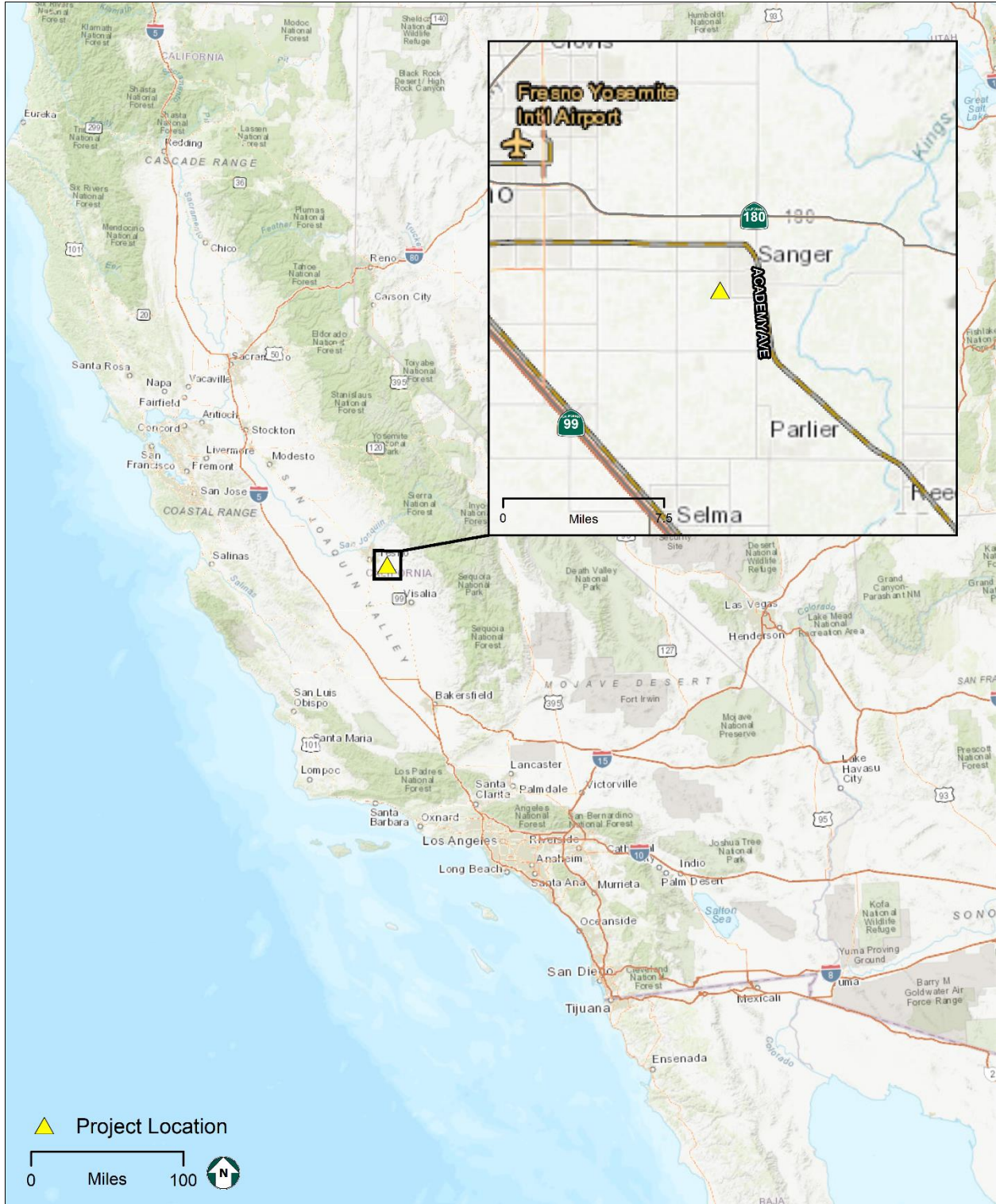


Figure 1-1  
Regional Location

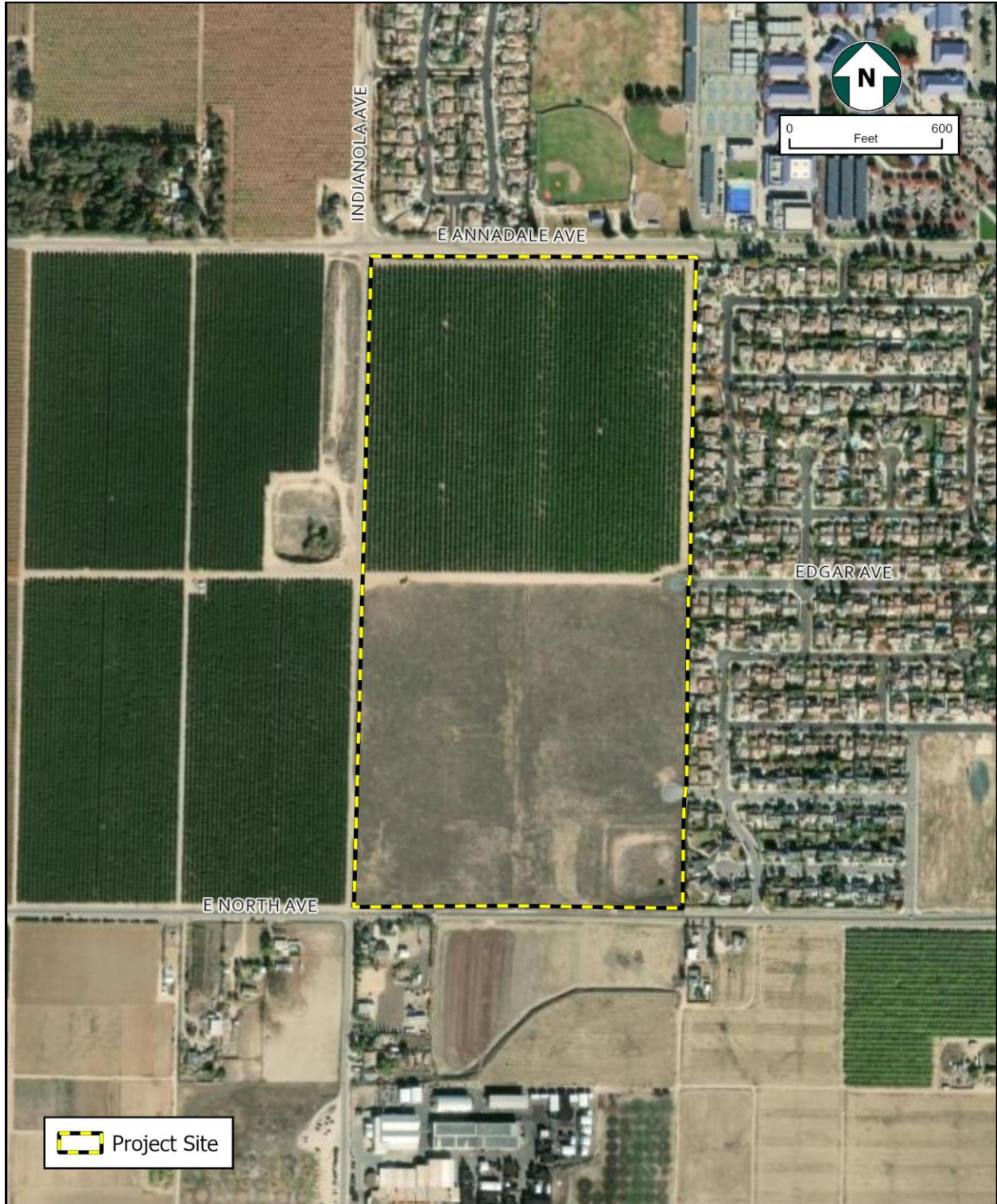


Figure 1-2  
Project Site

## **SECTION 2 - PROJECT DESCRIPTION**

### **2.1 - Introduction**

### **2.2 - Project Location**

Lennar Homes of California (Applicant) proposes to develop TTM 6493, a 530-lot single-family subdivision and a neighborhood park on an approximately 78-acre Project site (Figure 2-1). The Project is located within the City's Sphere of Influence (SOI) in Fresno County and will require annexation of the site into City limits.

The Project includes an approximately 78-acre project site consisting of two parcels (APN: 322-020-18S and 322-020-08) located in the City's SOI. The site is generally bounded by Annadale Avenue to the north and North Avenue to the south. The site is located within Section 21, Township 14S, Range 22E, MDB&M, of the Sanger USGS Quad Map.

### **2.3 - Project Environment**

The northern portion of the Project site is currently under agricultural cultivation and the southerly portion of the site is undeveloped. The Project is bounded East Annadale Avenue, Sanger Highschool and single-family residential to the north, single-family residential to the east, rural residential and undeveloped land to the south, and agricultural cultivation to the west.

The Project site is currently designated as Medium Density Residential and Park and Open Space by the 2035 General Plan (City of Sanger 2020). Under the County of Fresno General Plan, the site is designated as Agriculture and zoned AE-20 (Exclusive Agricultural, 20-acre minimum parcel size). As noted above, the Project site is outside the City limits but within the City's SOI, and will require annexation. The subject site is proposed to be rezoned R-1-6 (Single-Family Residential District) and RSC (Recreation, School, and Conservation). Regional access to the Project site is provided by State Route (SR) 180.

### **2.4 - Proposed Project**

The Project proposes to develop a 530-lot single-family residential subdivision (TTM 6493) and a neighborhood park on an approximately 78-acre Project site. On- and off-site improvements including external circulation roads, interior local streets, curb, gutter, sidewalk, and landscaping are proposed. Water and sewer utilities will be provided by the City. The site is currently designated as Residential Medium Density and Park/Open Space in the General Plan Land Use Map.

The Project is proposed to be developed in two phases. Phase 1 will consist of 38.9 acres (net 32.5 acres) and will be developed with 269 single-family residential lots and a neighborhood park (approximately 3.23 acres). The first phase will contain various lots sizes with the minimum lot size at 2,782 square feet. Phase 2 will consist of 39.8 acres (net 35.6 acres) that

will be developed with 261 single-family residential lots. Lot sizes in the second phase will vary with the minimum lot size at 3,768 square feet.

The following discretionary entitlements are required for the proposed Project:

- Annexation into the City of Sanger initiated by City Council and approved by the Fresno Local Agency Formation Commission (LAFCo)
- Approval of TTM 6493
- Approval of a General Plan Amendment to change approximately 14.27 acres of Park and Open Space to Medium Density Residential.
- Approval of a Prezone to R-1-6 (Single-Family Residential District) and RSC (Recreation, School, and Conservation District)
- Approval of a Conditional Use Permit (CUP) for a Planned Unit Development to allow reduced lot sizes, reduced setbacks and deviations from the development standards of the R-1-6 Zone District.

Full buildout of the residential area will take approximately two years after approval and necessary permits are issued. It is anticipated that the following pieces of equipment will be used during construction activities:

- Roller
- Loaded trucks
- Excavator
- Generator
- Service truck
- Air compressor

# Project Description

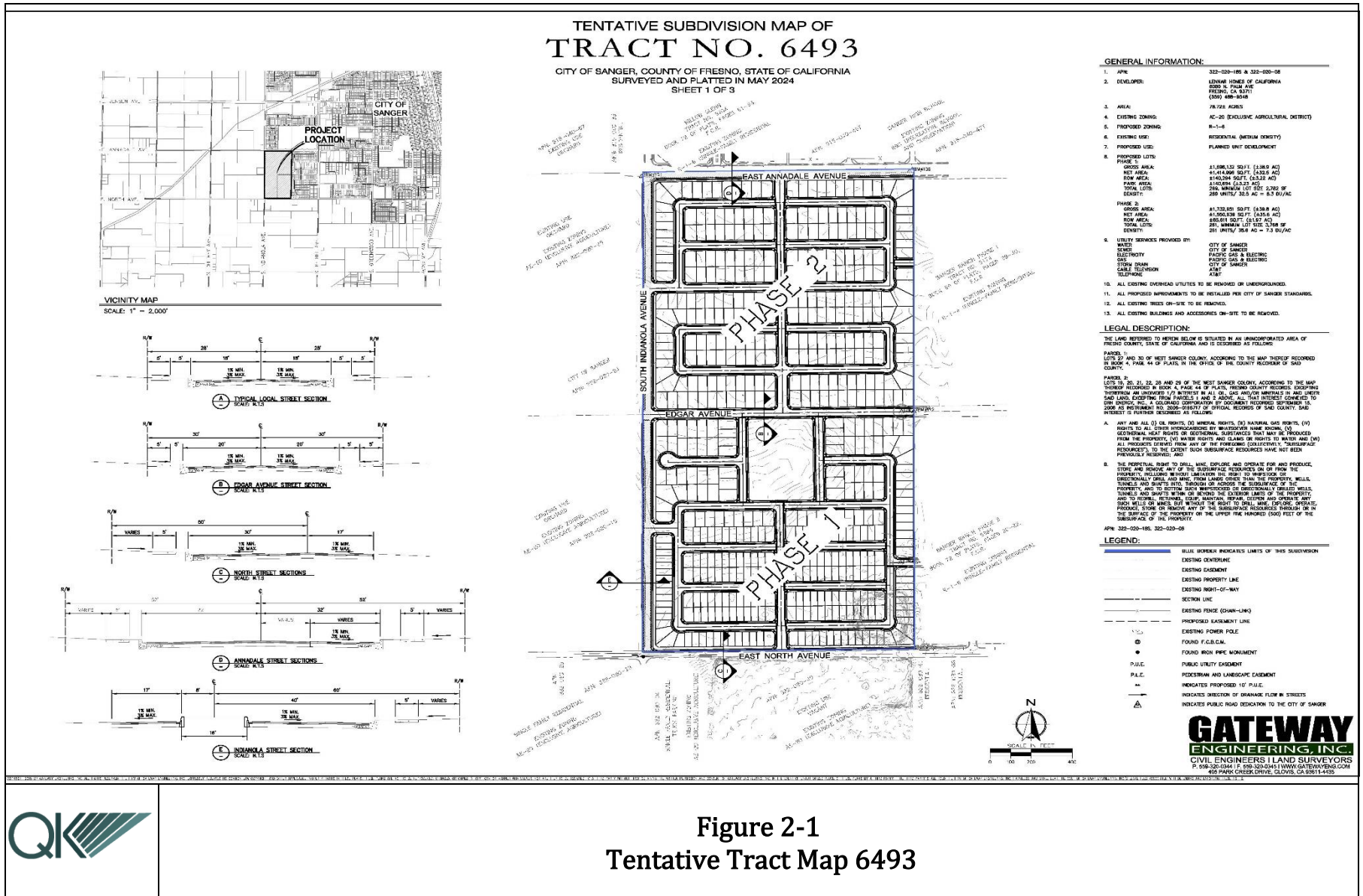


Figure 2-1  
Tentative Tract Map 6493

## **SECTION 3 - INITIAL STUDY**

### **3.1 - Environmental Checklist**

**1. Project Title:**

Tentative Tract Map No. 6493

**2. Lead Agency Name and Address:**

City of Sanger Planning Division  
1700 7<sup>th</sup> Street  
Sanger, CA 93657

**3. Contact Person and Phone Number:**

Jaymie Brauer, Principal Planner  
QK  
5080 California Avenue, Suite 220  
Bakersfield, CA 93309  
(661) 616-2600

Derek Sylvester, Senior Planner  
City of Sanger Planning Division  
1700 7<sup>th</sup> Street  
Sanger, CA 93657  
(559) 876-6300 x1540

**4. Project Location:**

The Project proposes to develop an approximately 78-acre project site consisting of two parcels (APN: 322-020-18S and 322-020-08) located in the SOI of the City of Sanger. The proposed site is generally bounded by Annadale Avenue to the north and North Avenue to the south. The site is located within Section 21, Township 14S, Range 22E, MDB&M, of the Sanger USGS Quad Map.

**5. General Plan Designation:**

Existing: Medium Density Residential and Park and Open Space

Proposed: Medium Density Residential and Park and Open Space

**6. Zoning:**

Existing: Fresno County - AE-20 (Exclusive Agriculture, 20-acre minimum parcel size)

Proposed: City of Sanger R-1-6 (Single-Family Residential) and RSC (Recreation, School, and Conservation)

## 7. Description of Project:

The Project is proposed to be developed in two phases. Phase 1 will consist of 38.9 acres (net 32.5 acres) and will be developed with 269 single-family residential lots and a neighborhood park. The first phase will contain various lots sizes with the minimum lot size at 2,782 square feet. Phase 2 will consist of 39.8 acres (net 35.6 acres) that will be developed with 261 single-family residential lots. Lot sizes in the second phase will vary with the minimum lot size at 3,768 square feet.

The following discretionary entitlements are required for the proposed Project:

- Annexation into the City of Sanger initiated by the City Council and approved by the Fresno Local Agency Formation Commission (LAFCo)
- Approval of TTM 6493
- Approval of a General Plan Amendment to change approximately 14.27 acres of Park and Open Space to Medium Density Residential.
- Approval of a Prezone to R-1-6 (Single-Family Residential District) and RSC (Recreation, School, and Conservation)
- Approval of a Conditional Use Permit (CUP) for a Planned Unit Development to allow reduced lot sizes, reduced setbacks and deviations from the development standards of the R-1-6 Zone District.

## 8. Surrounding Land Uses and Setting:

The Project is bounded by East Annadale Avenue, Sanger Highschool and single-family residential to the north, single-family residential to the east, rural residential and undeveloped land to the south, and agricultural cultivation to the west.

## 9. Other Public Agencies Whose Approval May be Required:

- California State Water Resources Control Board
- Fresno Local Agency Formation Commission (LAFCo)
- San Joaquin Valley Air Pollution Control District

## 10. Have California Native American tribes traditionally and culturally affiliated with the Project area requested consultation pursuant to Public Resources Code Section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of the significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

A Sacred Land Files search was requested from the Native American Heritage Commission (NAHC), and a response was received on January 9, 2025. The NAHC responded with its findings that indicate positive results. Based on the results of the

cultural records search prepared for the Project and the lack of historical or archaeological resources previously identified within a half-mile radius of the proposed site, the potential to encounter subsurface cultural resources is minimal. The potential to uncover subsurface historical or archaeological deposits would be considered unlikely. Additionally, the Project construction would be conducted within the partially developed and previously disturbed parcel.

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

### 3.2 - Environmental Factors Potentially Affected

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

- |  |   |  |
|--|---|--|
| <input type="checkbox"/> Aesthetics                      | <input type="checkbox"/> Agriculture and Forestry Resources | <input type="checkbox"/> Air Quality                                   |
| <input checked="" type="checkbox"/> Biological Resources | <input checked="" type="checkbox"/> Cultural Resources      | <input type="checkbox"/> Energy  |
| <input checked="" type="checkbox"/> Geology / Soils      | <input type="checkbox"/> Greenhouse Gas Emissions           | <input checked="" type="checkbox"/> Hazards & Hazardous Materials      |
| <input type="checkbox"/> Hydrology / Water Quality       | <input type="checkbox"/> Land Use / Planning                | <input type="checkbox"/> Mineral Resources                             |
| <input checked="" type="checkbox"/> Noise                | <input type="checkbox"/> Population / Housing               | <input type="checkbox"/> Public Services                               |
| <input type="checkbox"/> Recreation                      | <input type="checkbox"/> Transportation                     | <input checked="" type="checkbox"/> Tribal Cultural Resources          |
| <input type="checkbox"/> Utilities / Service Systems     | <input type="checkbox"/> Wildfire                           | <input checked="" type="checkbox"/> Mandatory Findings of Significance |

### 3.3 - Determination

On the basis of this initial evaluation:

- I find that the proposed Project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed Project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the Project have been made by or agreed to by the Project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the proposed Project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that the proposed Project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect (a) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (b) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENT IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed Project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed

adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed Project, nothing further is required.

*Derek Sylvester*

6/24/2025

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Signature

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Date

Derek Sylvester

City of Sanger

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Printed Name

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For

### **3.4 - Evaluation of Environmental Impacts**

1. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a Lead Agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to Projects like the one involved (e.g., the Project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on Project-specific factors as well as general standards (e.g., the Project will not expose sensitive receptors to pollutants, based on a Project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as Project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the Lead Agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
4. "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less-Than-Significant Impact." The Lead Agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less-than-significant level (mitigation measures from "Earlier Analyses," as described in (5) below, may be cross-referenced).
5. Earlier analyses may be used where, pursuant to the tiering, program environmental impact report (EIR), or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
  - a. Earlier Analysis Used. Identify and state where they are available for review.
  - b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
  - c. Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the Project.

6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
7. Supporting Information Sources: A source list should be attached, and other sources used, or individuals contacted should be cited in the discussion.
8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a Project's environmental effects in whatever format is selected.
9. The explanation of each issue should identify:
  - a. the significance criteria or threshold, if any, used to evaluate each question; and
  - b. the mitigation measure identified, if any, to reduce the impact to less than significance.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
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**3.4.1 - AESTHETICS**

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

a. Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. In non-urbanized area, substantially degrade the existing visual character or quality of public views of the site and its surroundings? If the Project is in an urbanized area, would the Project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Discussion**

**Impact #3.4.1a – Would the Project have a substantial adverse effect on a scenic vista?**

Scenic vistas are defined as expansive views of highly valued landscapes from publicly accessible viewpoints. Scenic vistas include views of natural features such as topography, water courses, rock outcrops, and natural vegetation as well as manmade scenic structures. It is noted in the General Plan EIR that there are no designated scenic vistas. The General Plan EIR further states that changes to the visual character of the undeveloped portions of the City, including vacant infill parcels and within undeveloped portions of the SOI will occur as a result of General Plan implementation. Visual conditions would change from agricultural and/or vacant lands to urban uses. The only scenic resources of note in vicinity of the City are the Kings River and the Sierra Nevada mountain range, both located east of the Project. The Kings River is located approximately three miles east of the Project site and would be unimpacted by Project development. The Sierra Nevada mountain range will be largely unaffected by the Project due to intervening development and distance from the site.

The City of Sanger General Plan Objective 1 of Chapter 4 (Page 4.19) identifies several roadways of focus for visual improvement to benefit the community. These roads include

Academy Avenue, Jensen Avenue, 5<sup>th</sup> Street, 7<sup>th</sup> Street, and 9<sup>th</sup> Street. The Project site is not located along any of the identified roadways, would not be subject to associated aesthetic standards nor would the Project impact the visual character of these streets.

The Project site is not within or in the vicinity of a city, county, or State identified scenic vista. As discussed above, the Project site would not impact views of scenic resources including the Kings River and Sierra Nevada mountain range, located east of the Project site. The Project will comply with General Plan goals, objectives, and action plans for residential development within the City, and the development standards of the RSC and R-1-6 zone district including the proposed PUD deviations of the R-1-6 district to allow reduced lot sizes, reduced setbacks and other deviations. Furthermore, the development of the project would not block or preclude views of any area containing importance or what would be considered visually appealing landforms. Therefore, with compliance with General Plan policies, a less than significant impact is anticipated on scenic resources.

**MITIGATION MEASURE(S)**

No mitigation is required.

**LEVEL OF SIGNIFICANCE**

There would be *less than significant impact*.

**Impact #3.4.1b – Would the Project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?**

See Impact #3.4.1a above.

The Project does not lie near or within a State Designated or Eligible State Scenic Highway (California Department of Transportation 2024). The nearest Eligible Scenic Highway is SR 180, approximately seven miles east of the Project site, and would not be impacted. The Project does not include the removal of trees determined to be scenic or of scenic value, the destruction of rock outcroppings or degradation of any historic building(s). Therefore, the Project would have no impact.

**MITIGATION MEASURE(S)**

No mitigation is required.

**LEVEL OF SIGNIFICANCE**

There would be *no impact*.

**Impact #3.4.1c – In non-urbanized area, substantially degrade the existing visual character or quality of public views of the site and its surroundings? If the Project is in an urbanized area, would the Project conflict with applicable zoning and other regulations governing scenic quality?**

The Project site is located adjacent to the western boundary of the City limits. The property is bound by East North Avenue to the south, agricultural uses to the west, single-family residential development to the east, and Sanger High School and residential development to the north. The City General Plan Land Use Map designates areas to the north, east, west, and south for Medium Density Residential. Under the City 2023 Zoning Map, land to the north is zoned R-1-6 and RSC (Recreation, School and Conservation), and land to the east is zoned R-1-6. The Project site and properties to the west and south are located outside of the city limits and are zoned as AE-20 (Exclusive Agricultural, 20-acre minimum parcel size) by the Fresno County Zoning Ordinance. Approvals for the Project include annexation into the City, General Plan Amendment, Tentative Map, Planned Unit Development, and rezoning of the site within the R-1-6 and RSC zone districts.

The proposed residential development will be subject to the City Zoning Ordinance and General Plan. The Goals, Objectives and Actions Plans of Issue 3 of the Sanger General Plan Land Use Element (Page 2-49 through 2-53) contains development and landscaping standards for residentially zoned areas. Specifically, Goal II and the associated objectives and actions plans where creation of neighborhoods that are quiet, visually pleasing, and cool and, the use of Sanger Community Design Standards and Guidelines would be incorporated into the design of the Project. Additionally, standards under Chapter 90, Article IV for the RSC zone District and Article VIII for the R-1-6 zoning district with exception of the proposed deviations under the PUD proposal would be required for the Project. The proposed Project would be developed in similar visual quality to existing residential developments to the north and east and would not substantially degrade the existing visual character of the area. The Project would comply with City of Sanger development and landscape standards and would not conflict with applicable zoning and other regulations governing scenic quality.

**MITIGATION MEASURE(S)**

No mitigation is required.

**LEVEL OF SIGNIFICANCE**

Impacts would be *less than significant*.

**Impact #3.4.1d – Would the Project create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?**

Construction of the proposed project would generally occur during daytime hours, typically from 7:00 a.m. to 7:00 p.m. as regulated by the City under Sect 38.24.4-18 of the City Municipal Code. Increased truck traffic and the transport of construction materials to the Project site would also be minimal and temporary in nature. Construction activity would focus on specific areas on the sites, and any sources of glare would not be stationary for a prolonged period of time. Therefore, construction of the proposed Project would not create a new source of substantial glare that would affect daytime views in the area.

Once constructed, the Project will include exterior lighting for the proposed residences. Outdoor lighting is regulated under Section 14-108 of the City Municipal Code where outdoor lighting fixtures shall be hooded and arranged or controlled so as not to cause an annoyance or nuisance to vehicular traffic or adjacent properties. With the compliance of the Sanger Municipal Code and General Plan, and other applicable local development standards for exterior lighting, the proposed Project would not create new sources of substantial light or glare that would adversely affect day or nighttime views in the area. Therefore, Project impacts would be less than significant.

***MITIGATION MEASURE(S)***

No mitigation is required.

***LEVEL OF SIGNIFICANCE***

Impacts would be *less than significant*.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
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**3.4.2 - AGRICULTURE AND FORESTRY RESOURCES**

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state’s inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment Project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the Project:

a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with existing zoning for agricultural use or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

## **Discussion**

**Impact #3.4.2a – Would the Project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?**

The Farmland Mapping and Monitoring Program (FMMP) designation of the Project site as depicted in Figure 3.4.2-1 is listed as Prime Farmland, Farmland of Statewide Importance, and Farmland of Local Importance (California Department of Conservation 2024). The Project site is bounded by Urban and Built-Up Land to the north and west, Farmland of Local Importance and Rural Residential to the south, and Farmland of Statewide Importance and Vacant and Disturbed Land to the east.

The General Plan EIR states that full buildout of planning area would result in the direct conversion of approximately 1,827 acres of Important Farmland to non-agricultural use. Implementation of the Project would convert approximately 38 acres of Important Farmland to residential. This results in an approximately two percent decrease in the Important Farmland inventory in the SOI. Additionally, the Project site does not have water allocation from the Consolidated Irrigation District and is therefore no longer viable as an agricultural site.

As noted, the General Plan designates this area for open space and residential development. To reduce impacts and protect agricultural resources, the General Plan EIR has adopted various goals, objectives and action plans, however, the conversion of the 1,827 acres of Important Farmland will have a significant and unavoidable impact to Important Farmland. The EIR states that “by managing growth into agricultural areas in a measured way and ensuring that the agricultural use of land within the proposed SOI remains viable until such time as the land is annexed and developed for non-agricultural use, the policies will serve to limit the premature conversion of Important Farmland”.

The Project site is designated for open space and residential development with the Project proposal changing 14.27 acres of open space designation to medium density residential. The Project will be located adjacent to existing urban development to the east and north. The proposed Project will result in the conversion of Important Farmland, however, consideration of the Project site not having water allocations from the irrigation district indicates that farming viability of the site has been reduced. Project development will be in accordance with the 2035 General Plan and comply with the goals, objectives and actions adopted in the 2035 General Plan. The impact of converting Important Farmland has been analyzed in the General Plan EIR and determined that there are no feasible mitigation measures. The Project will not have any impacts beyond what has already been analyzed in the City of Sanger General Plan EIR. The Project site does not have a water allocation from the irrigation district and would reduce Important Farmland within the SOI by an insignificant amount. Impacts would be less than significant.



**MITIGATION MEASURE(S)**

No mitigation is required.

**LEVEL OF SIGNIFICANCE**

Impacts would be *less than significant*.

**Impact #3.4.2b – Would the Project conflict with existing zoning for agricultural use or a Williamson Act contract?**

The Project site is not subject to a Williamson Act land use contract, according to data available from the California Department of Conservation. The Project site has been cultivated for citrus orchards, however, as noted, recently lost the water allocation from the Consolidated Irrigation District and will not be viable for agricultural purposes in the future. The Project site is currently zoned AE-20 (Exclusive Agricultural, 20-acre minimum parcel size) under the Fresno County Zoning Ordinance. Annexation of the Project site into City limits would result in a General Plan land use designation of Medium Density Residential and Park/Open Space and a rezoning of the site to RSC R-1-6.

As discussed in Impact #3.4.2a, the Project site is located within the SOI of Sanger and has been designated for residential and open space use within the General Plan. The Project proposes to develop the site for residential purposes which is consistent with the Sanger General Plan and Zoning Ordinance. Policy LU-G.4 of the Fresno County General Plan encourages orderly expansion of urban development supporting those within City SOI expansion proposals. Further, City of Sanger General Plan Policy notes by managing growth into agricultural areas in a measured way and ensuring that the agricultural use of land within the proposed SOI remains viable until such time as the land is annexed and developed for non-agricultural use, the policies will serve to limit the premature conversion of Important Farmland. Therefore, although the site is currently zoned for agricultural use, its location within the Sanger SOI allows the noted General Plan Policies for orderly expansion within the Fresno County General Plan, and managed growth under the City of Sanger General Plan (Page 2-46) would allow for the proposed annexation, General Plan Amendment, and rezoning to a non-agricultural use.

Therefore, the Project proposal would not result in a conflict with existing zoning for agricultural use or a Williamson Act contract, and there would be a less than significant impact.

**MITIGATION MEASURE(S)**

No mitigation is required.

**LEVEL OF SIGNIFICANCE**

There would be *a less than significant impact*.

**Impact #3.4.2c – Would the Project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?**

The Public Resources Code (PRC) Section 12220(g) and Section 4526 defines “Forest land” as land that can support 10 percent native tree cover of any species, including hardwoods, under natural conditions and that allows for the management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits. Timberland, pursuant to PRC 4526, is land other than land owned by the federal government and land designated as experimental forest land, which is available for and capable of growing a crop of trees of a commercial species used to produce lumber and other forest products, including Christmas trees.

There are no forest lands or timberlands identified on the Project sites or within its vicinity. The Project would not result in the loss or conversion of forest land to a non-forest use. Therefore, there would be no impact.

***MITIGATION MEASURE(S)***

No mitigation is required.

***LEVEL OF SIGNIFICANCE***

There would be *no impact*.

**Impact #3.4.2d – Would the Project result in the loss of forest land or conversion of forest land to non-forest use?**

See discussion of Impact #3.4.2c above.

***MITIGATION MEASURE(S)***

No mitigation is required.

***LEVEL OF SIGNIFICANCE***

There would be *no impact*.

**Impact #3.4.2e – Would the Project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?**

See discussion of Impacts #3.4.2a, #3.4.2b, #3.4.2c, and #3.4.2d above.

**MITIGATION MEASURE(S)**

No mitigation is required.

**LEVEL OF SIGNIFICANCE**

Impacts would be *less than significant*.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
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### 3.4.3 - AIR QUALITY

Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the Project:

a.	Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b.	Result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable federal or state ambient air quality standard?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c.	Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d.	Result in other emissions (such as those leading to odor) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

### Discussion

The analyses in this section are based on an *Air Quality and Greenhouse Gas Impact Assessment* (VRPA Technologies, Inc. 2024a) and a *Health Risk Assessment* (VRPA Technologies, Inc. 2024b), both attached as Appendix A.

#### Impact #3.4.3a – Would the Project conflict with or obstruct implementation of the applicable air quality plan?

The City is located in the San Joaquin Valley Air Basin (SJVAB). The surrounding topography includes foothills and mountains to the east and west that direct air circulation and dispersion patterns. Temperature inversions can trap air within the Valley, thereby preventing the vertical dispersal of air pollutants. In addition to topographic conditions, the local climate can also contribute to air quality problems. The climate is characterized by hot, dry summers and cool winters with the notable presence of Tule fog.

The primary way of determining consistency with the air quality plan’s (AQP) assumptions is determining consistency with the applicable General Plan to ensure that the Project’s population density and land use are consistent with the growth assumptions used in the AQPs for the air basin.

As required by California law, city and county General Plans contain a Land Use Element that

details the types and quantities of land uses that the city or county estimates will be needed for future growth, and that designate locations for land uses to regulate growth. Fresno Council of Governments (COG) uses the growth projections and land use information in adopted general plans to estimate future average daily trips and then vehicle miles traveled (VMT), which are then provided to the San Joaquin Valley Air Pollution Control District (SJVAPCD) to estimate future emissions in the AQPs. Existing and future pollutant emissions computed in the AQP are based on land uses from area general plans. AQPs detail the control measures and emission reductions required for reaching attainment of the air standards.

The applicable General Plan for the Project is the 2035 General Plan Update (City of Sanger 2020). The Project is consistent with the currently adopted General Plan and is therefore consistent with the population growth and VMT applied in the plan. Therefore, the Project is consistent with the growth assumptions used in the applicable AQPs. As a result, the Project will not conflict with or obstruct implementation of any air quality plans. Therefore, no mitigation is needed.

**MITIGATION MEASURE(S)**

No mitigation is required.

**LEVEL OF SIGNIFICANCE**

Impacts would be *less than significant*.

**Impact #3.4.3b – Would the Project result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?**

The Fresno County area is nonattainment for federal and State air quality standards for ozone, in attainment of federal standards and nonattainment for State standards for particulate matter 10 microns or less in diameter (PM<sub>10</sub>), and nonattainment for Federal and State standards for particulate matter 2.5 microns or less in diameter (PM<sub>2.5</sub>). The SJVAPCD has prepared the 2016 and 2013 Ozone Plans, 2007 PM<sub>10</sub> Maintenance Plan, and 2012 PM<sub>2.5</sub> Plan to achieve Federal and State standards for improved air quality in the SJVAB regarding ozone and particulate matter (PM). Inconsistency with any of the plans would be considered a cumulatively adverse air quality impact. As discussed in Section 3.4.3a, the Project is consistent with the currently adopted General Plan for the City of Sanger and is therefore consistent with the population growth and VMT applied in the plan. Therefore, the Project is consistent with the growth assumptions used in the 2016 and 2013 Ozone Plan, 2007 PM<sub>10</sub> Maintenance Plan, and 2012 PM<sub>2.5</sub> Plan.

Project specific emissions that exceed the thresholds of significance for criteria pollutants would be expected to result in a cumulatively considerable net increase of any criteria pollutant for which the County is in non-attainment under applicable federal or state

ambient air quality standards. It should be noted that a project is not characterized as cumulatively insignificant when project emissions fall below thresholds of significance. The

SJVAPCD has established thresholds of significance for determining environmental significance that are provided in Table 3.4-1, below.

**Table 3.4-1  
SJVAPCD Air Quality Thresholds of Significance – Criteria Pollutants**

Criteria Pollutant	Construction Emissions (tons per yr.)	Operational Emissions (tons per yr.)
Carbon Monoxide (CO)	100	100
Nitric Oxide (NOx)	10	10
Reactive Organic Gases (ROG)	10	10
Sulfur Oxide (SOx)	27	27
PM <sub>10</sub>	15	15
PM <sub>2.5</sub>	15	15

Source: Appendix B

The proposed Project would be required to comply with all recommended measures for construction activities listed in the SJVAPCD Guidance for Assessing and Mitigating Air Quality Impacts (GAMAQI), applicable measures set for in Title 24 of the Uniform Building Code, and applicable SJVAPCD rules.

### **Short-Term Construction Emissions**

Short-term impacts are mainly related to the construction phase of a project and are recognized to be short in duration. Construction air quality impacts are generally attributable to dust and exhaust pollutants generated by equipment and vehicles. Fugitive dust is emitted both during construction activity and as a result of wind erosion over exposed earth surfaces. Clearing and earth moving activities do comprise major sources of construction dust emissions, but traffic and general disturbances of soil surfaces also generate significant dust emissions. Further, dust generation is dependent on soil type and soil moisture. Exhaust pollutants are the non-useable gaseous waste products produced during the combustion process. Engine exhaust contains CO, hydrocarbons (HC), and NOx pollutants which are harmful to the environment.

Adverse effects of construction activities cause increased dust-fall and locally elevated levels of total suspended particulate. Dust-fall can be a nuisance to neighboring properties or previously completed developments surrounding or within the Project area and may require frequent washing during the construction period. PM<sub>10</sub> emissions can result from construction activities of the Project. The SJVAPCD has determined that compliance with Regulation VIII and other control measures will constitute sufficient mitigation to reduce PM<sub>10</sub> impacts to a level considered less-than significant for most development projects. Even with implementation of District Regulation VIII and District Rule 9510, large development

projects may not be able to reduce project specific construction impacts below District thresholds of significance. Ozone precursor emissions are also an impact of construction activities and can be quantified through calculations. Numerous variables factored into estimating total construction emission include: level of activity, length of construction period, number of pieces and types of equipment in use, site characteristics, weather conditions, number of construction personnel, and the amount of materials to be transported onsite or offsite. Additional exhaust emissions would be associated with the transport of workers and materials. Because the specific mix of construction equipment is not presently known for this Project, construction emissions were estimated using CalEEMod Model defaults for construction equipment. Table 3.4-2 shows the estimated construction emissions that would be generated from the Project.

**Table 3.4-2  
Construction Emissions**

	Pollutant						Carbon Dioxide equivalent emissions (CO <sub>2e</sub> )
	CO	NO <sub>x</sub>	ROG	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	
	(tons/year)						
Project Construction Emissions	3.48	3.65	7.05	8.26	1.89	0.82	732.65
<b>SJVAPCD Significance Threshold</b>	<b>100</b>	<b>10</b>	<b>10</b>	<b>27</b>	<b>15</b>	<b>15</b>	<b>None</b>
Is the SJVAPCD Threshold Exceeded After Mitigation?	No	No	No	No	No	No	No

Source: Appendix A

As calculated with CalEEMod, the estimated short-term construction-related emissions for criteria pollutants would not exceed significance threshold levels.

### ***Long-Term Operational Emissions***

Long-Term emissions from the Project would be generated primarily by mobile source (vehicle) emissions from the Project site and area sources such as lawn maintenance equipment.

### ***Localized Operational Emissions***

The Fresno County area is nonattainment for Federal and State air quality standards for ozone, attainment of Federal standards for PM<sub>10</sub> and nonattainment for State standards, and nonattainment for Federal and State standards for PM<sub>2.5</sub>. Nitrogen oxides and reactive organic gases are regulated as ozone precursors. Significance thresholds are established by

SJVAPCD and are summarized in Table 3.4-1 above. Operational emissions estimated for operation of the proposed project are shown in Table 3.4-3 below.

**Table 3.4-3: Operational Emissions**

	Pollutant						
	CO	NO <sub>x</sub>	ROG	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	CO <sub>2e</sub>
	(tons/year)						
Project Operational Emissions	40.03	4.79	8.66	0.10	7.97	3.99	7,019.07
<b>SJVAPCD Threshold</b>	100	10	10	27	15	15	None
Is SJVAPCD Threshold Exceeded?	No	No	No	No	No	No	No

Source: Appendix A

Operation of the Project site at full build-out is not expected to present a substantial source of fugitive dust (PM<sub>10</sub>) emissions. The main source of PM<sub>10</sub> emissions would be from vehicular traffic associated with the Project site.

PM<sub>10</sub>, on its own as well as in combination with other pollutants, creates a health hazard. The SJVAPCD's Regulation VIII establishes required controls to reduce and minimize fugitive dust emissions. The following SJVAPCD Rules and Regulations apply to the proposed Project (and all projects):

- Rule 4102 – Nuisance – prohibits a facility from posing as a nuisance to surrounding receptors and can impose penalties for nuisance issues such as dust, smoke, excess emissions, etc. Compliance with this rule ensures that the area around the Project site will not be adversely impacted by such issues.
- Regulation VIII – Fugitive PM<sub>10</sub> Prohibitions – a series of regulations to reduce and/or eliminate generation of particulate matter (PM) that can adversely impact visibility as well as the health and safety of people on-site or in the vicinity of the Project.
  - Rule 8011 - General Requirements – this rule is to reduce ambient concentrations of fine particulate matter (PM<sub>10</sub>) by requiring actions to prevent, reduce or mitigate anthropogenic (human-caused) fugitive dust emissions.
  - Rule 8021 - Construction, Demolition, Excavation, Extraction, and Other Earthmoving Activities – restricts generation of airborne dust and visibility impacts from these activities. Places limits on opacity and equipment operation under certain adverse weather conditions.

- Rule 8041 - Carryout and Trackout – requires that equipment and vehicles leaving the construction site control the amount of dirt, soil or mud that is tracked offsite and onto public roadways. This helps eliminate or minimize dust generation and opacity degradation.
- Rule 8051 - Open Areas – limits fugitive dust from open areas, i.e., areas on a construction site that are not actively being constructed upon but may generate wind-blown dust.

The Project would comply with applicable SJVAPCD Rules and Regulations, the local zoning codes, and additional emissions reduction measures recommended in the *Air Quality Impact Analysis*.

### ***Exhaust Emissions***

Project-related transportation activities from residences would generate mobile source ROG, NO<sub>x</sub>, SO<sub>x</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub> exhaust emissions. Exhaust emissions would vary substantially from day to day but would average out over the course of an operational year. The variables factored into estimating total Project emissions include: level of activity, site characteristics, weather conditions, and number of visitors. As the Project is not expected to generate an adverse change in current activity levels, substantial emissions are not anticipated. The trip rates used in CalEEMod were adjusted to reflect Project-specific estimates. Vehicle fleet mix was revised per the approved SJVAPCD residential fleet mix.

### ***Projected Emissions***

Operation of the proposed Project is anticipated to generate criteria pollutant emissions below SJVAPCD significance threshold levels, as shown in Table 3.4-3. Therefore, the operation of the Project will result in a less than significant impact.

Project specific emissions that exceed the thresholds of significance for criteria pollutants would be expected to result in a cumulatively considerable net increase of any criteria pollutant for which the County is in non-attainment under applicable federal or state ambient air quality standards. It should be noted that a project is not characterized as cumulatively insignificant when project emissions fall below thresholds of significance. Therefore, as discussed above, both construction and operational emissions are not anticipated to exceed SJVAPCD's established emissions thresholds and significance thresholds for all CEQA air quality determinations. Therefore, this Project would not have a significant impact on the SJVAB. The proposed Project would not result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable federal or state ambient air quality standard and would have a less-than-significant impact.

### ***MITIGATION MEASURE(S)***

No mitigation is required.

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**LEVEL OF SIGNIFICANCE**

Impacts would be *less than significant*.

**Impact #3.4.3c – Would the Project expose sensitive receptors to substantial pollutant concentrations?**

From a health risk perspective, the Project may potentially place sensitive receptors in the vicinity of existing toxic emission sources. Sensitive receptors refer to those segments of the population most susceptible to poor air quality (i.e., children, the elderly, and those with pre-existing serious health problems affected by air quality). Land uses that have the greatest potential to attract these types of sensitive receptors include schools, parks, playgrounds, daycare centers, nursing homes, hospitals, and residential communities. Chooljian Brothers Packing Company, Inc. and semi-truck/trailer parking are located directly to the south of the Project. Truck traffic and truck idling from these two operations could potentially expose Project sensitive receptors to toxic air contaminants (TAC) resulting from diesel emissions.

The SJVAPCD's current thresholds of significance for TAC emissions from the operations of both permitted and non-permitted sources are presented below:

- Carcinogens: Maximally exposed individual risk equals or exceeds 10 in one million.
- Chronic: Hazard index equals or exceeds 1 for the maximally exposed individual.
- Acute: Hazard index equals or exceeds 1 for the maximally exposed individual.

Carcinogenic (cancer) risk is expressed as cancer cases per one million. Noncarcinogenic (acute and chronic) hazard indices (HI) are expressed as a ratio of expected exposure levels to acceptable exposure levels. These metrics are generally applied to the maximally exposed individual (MEI). There are separate MEIs for residential exposure (i.e., residential areas) and for worker exposure (i.e., offsite workplaces). Residential exposure is for a worst-case exposure duration of 24 hours a day, 350 days a year for 70 years. For off-site workplaces, the exposure is 8 hours a day, 245 days a year for 40 years.

***Cancer Risk***

Cancer risk is defined as the lifetime probability (chance) of developing cancer from exposure to a carcinogen, typically expressed as chances per million. Exposure to cancer-causing substances can be through direct inhalation or other pathways. The cancer risk associated with inhalation of a carcinogen can be estimated by multiplying the inhalation dose in units of milligram per kilogram-day (mg/kg-day) by an inhalation cancer potency factor [(mg/kg/day)<sup>-1</sup>].

For particulate-bound pollutants, exposure may be possible from indirect environmental pathways (non-inhalation pathways), such as deposition on the soil, followed by exposure through soil ingestion or absorption of the pollutant from soil adhered to the skin. Other ingestion pathways may be possible such as ingestion of crops grown in soil potentially

affected by deposited air pollutants and transmittal of a dose to an infant by breast milk due to the mother's cumulative exposure. Non-inhalation cancer risk is calculated from cancer toxicity factors and exposure assumptions.

### ***Non-Cancer Risk***

Non-cancer health risk refers to both acute (short-term) and chronic (long-term) adverse health effects other than cancer that may be associated with exposure to air toxics. The commonly employed regulatory metric for assessing noncancer effects is the HI, the ratio of the estimated exposure level of an air toxic compound to a scientifically derived reference exposure level (REL) for the same compound. RELs generally represent the highest exposure level where no adverse effect has been observed or the lowest exposure level where the onset of an adverse effect has been observed, with the inclusion of a safety factor ranging from 10 to 1000, depending on the source and quality of the scientific data.

If the reported concentration or dose of a given chemical is less than its REL, then the hazard index will be less than 1.0. When more than one chemical is considered, it is assumed that the effects are additive provided the associated chemicals are expected to have an adverse impact on the same target organ system (respiratory system, liver, etc.). Thus, chemical specific hazard indices are summed to arrive at a hazard index for each target organ. For any organ system, a total hazard index exceeding 1.0 indicates a potential health effect.

### ***Diesel Particulate Matter Emissions***

Vehicle diesel particulate matter (DPM) emissions from the fruit packing facility and semi-truck/trailer parking facility were estimated using emission factors for PM<sub>10</sub> generated with the 2021 version of the Emission Factor model (EMFAC) developed by the ARB. EMFAC 2021 is a mathematical model that was developed to calculate emission rates from motor vehicles that operate on highways, freeways, and local roads in California and is commonly used by the ARB to project changes in future emissions from on road mobile sources. The most recent version of this model approved by the United States Environmental Protection Agency (EPA), EMFAC 2021, incorporates regional motor vehicle data, information and estimates regarding the distribution of VMT by speed, and number of starts per day.

Several distinct emission processes are included in EMFAC 2021. Emission factors calculated using EMFAC 2021 are expressed in units grams per vehicle miles traveled (g/VMT) or grams per idle-hour (g/idle-hr), depending on the emission process. The emission processes and corresponding emission factor units associated with diesel particulate exhaust from adjacent parcels.

To assess DPM impacts on the Project, annual average PM<sub>10</sub> emission factors were generated by running EMFAC 2021 for vehicles in Fresno County. The EMFAC model generates emission factors in terms of grams of pollutant emitted per vehicle activity and can calculate a matrix of emission factors at specific values of temperature, relative humidity, and vehicle speed. The model was run for speeds traveled in the vicinity of the Project. The vehicle travel speeds for each segment modeled are summarized below.

- Fruit packing facility
  - Idling (15 minutes) – on-site loading/unloading
  - 10 miles per hour – on-site vehicle movement including driving and maneuvering
- Truck parking
  - Idling (15 minutes)
  - 10 miles per hour – on-site vehicle movement including driving and maneuvering
  - Transportation Refrigeration Unit (TRU) usage – 2 hours per day

The fruit packing facility and semi-truck/trailer parking facility are located directly to the south of the Project. Truck traffic and truck idling from these two operations could potentially expose Project sensitive receptors to TACs resulting from diesel emissions. Toxic emissions associated with these two facilities will generate a max score of 8.84 at sensitive Project receptors at the southern boundary of the Project site (VRPA Technologies, Inc. 2024b). Emissions associated with the fruit packing and truck parking facilities and their corresponding impact on the Project will not trigger detailed dispersion modeling since the Total Max Score is less than 10. As a result, existing toxic emitting sources in the Project vicinity will have a less than significant impact on the Project considering SJVAPCD's thresholds. Therefore, mitigation is not warranted since there is a less than significant impact to Project sensitive receptors.

**MITIGATION MEASURE(S)**

No mitigation is required.

**LEVEL OF SIGNIFICANCE**

Impacts would be *less than significant*.

**Impact #3.4.3d – Would the Project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?**

The SJVAPCD's GAMAQI states "An analysis of potential odor impacts should be conducted for both of the following two situations:

1. Generators – projects that would potentially generate odorous emissions proposed to locate near existing sensitive receptors or other land uses where people may congregate, and

2. Receivers – residential or other sensitive receptor projects or other projects built for the intent of attracting people locating near existing odor sources.”

The GAMAQI also states, “The District has identified some common types of facilities that have been known to produce odors in the San Joaquin Valley Air Basin. These are presented in GAMAQI (Screening Levels for Potential Odor Sources), along with a reasonable distance from the source within which, the degree of odors could possibly be significant. The distance recommendations can be used as a screening tool to qualitatively assess a project’s potential to adversely affect area receptors” (San Joaquin Valley Air Pollution Control District 2015). Because the Project is a residential development and the anticipated activities for the Project site are not listed in the GAMAQI as a source that would create objectionable odors, the Project is not expected to be a source of objectionable odors.

Based on the provisions of the SJVAPCD’s GAMAQI, the proposed Project would not exceed any screening trigger levels to be considered a source of objectionable odors or other emissions. Furthermore, there does not appear to be any significant source of objectionable odors or other emissions in close proximity that may adversely impact the Project site when it is in operation. Additionally, the Project emissions estimates indicate that it would not be expected to adversely impact surrounding receptors. As such, the proposed Project would not be a source of any odorous compounds nor would it likely be impacted by any odorous source or other emissions. Therefore, the Project will have a less-than-significant impact.

**MITIGATION MEASURE(S)**

No mitigation is required.

**LEVEL OF SIGNIFICANCE**

Impacts would be *less than significant*.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
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**3.4.4 - 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 Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species, or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Discussion**

The analyses in this section are based on a *Biological Evaluation* (Live Oak Associates, Inc. 2024) attached as Appendix B.

## Impact Analysis

**Impact #3.4.4a – Would the Project 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?**

The Biological Evaluation (BE) describes the biological resources of the Project site and evaluated the potential impacts to biological resources associated with Project implementation. A reconnaissance-level field survey of the project site was conducted on February 28, 2024. The survey consisted of walking and driving through the project site while identifying its principal land uses, biotic habitats, flora, and fauna, and assessing its potential to support special status species and other sensitive resources. Table 3.4.4-1 below provides a list of special status species that could occur in the Project vicinity.

**Table 3.4.4-1  
Lists of Special Status Species That Could Occur in the Project Vicinity**

Species	Status	Habitat/Range	Occurrence on the Project Site
<i>Plants</i>			
Succulent owl's clover ( <i>Castilleja campestris</i> <i>var. succulenta</i> )	FT, CE, CRPR 1B.2	Occurs in freshwater wetlands, and occasionally in non-wetlands in valley grassland and foothill woodlands, between 130 and 2,000 ft. in elevation. Blooms April-May.	<b>Absent.</b> Suitable habitat for this species is absent from the project site.
California jewelflower ( <i>Caulanthus californicus</i> )	FE, CE, CRPR 1B.1	Occurs in chenopod scrub, pinyon and juniper woodland, and valley and foothill grassland in sandy soils. Elevations between 200 and 3,300 feet. Blooms February-May.	<b>Absent.</b> Suitable habitat for this species is absent from the project site, and all historical populations of this species on the San Joaquin Valley floor are thought to have been extirpated by 1986 (USFWS 1998).
San Joaquin Valley orcutt grass ( <i>Orcuttia inaequalis</i> )	FT, CE CRPR 1B.1	Occurs in Central Valley vernal pools between 130 and 820 ft. in elevation. Requires deep pools with prolonged periods of inundation. Blooms April-September.	<b>Absent.</b> Suitable habitat for this species is absent from the project site.
San Joaquin adobe sunburst ( <i>Pseudobahia peirsonii</i> )	FT, CE, CRPR 1B.1	This annual sunflower occurs in grasslands of the Sierra Nevada foothills in heavy clay soils of the Porterville and Centerville series, between 300 and 2,625 ft. in elevation. Blooms March-April.	<b>Absent.</b> Suitable habitat and soils for this species are absent from the project site.

Greene's tuctoria ( <i>Tuctoria greenei</i> )	FE, CR  CRPR 1B.1	Occurs in vernal pools between 130 and 3,740 ft. in elevation. Requires deep pools with prolonged periods of inundation. Blooms May-September.	<b>Absent.</b> Suitable habitat for this species is absent from the project site.
Bristly sedge ( <i>Carex comosa</i> )	CRPR 2B.1	Found at the margins of lakes and other marsh habitats within valley and foothill grassland and coastal prairie ecosystems. Elevations up to 2,000 ft. Blooms May-September.	<b>Absent.</b> Suitable habitat for this species is absent from the project site.
Spiny-sepaled button-celery ( <i>Eryginum spinosepalum</i> )	CRPR 1B.2	Occurs in vernal pools in valley and foothill grasslands of the San Joaquin Valley and the Tulare Basin, between 330 and 840 ft. in elevation. Blooms April-May.	<b>Absent.</b> Suitable habitat for this species is absent from the project site.
Winter's sunflower ( <i>Helianthus winteri</i> )	CRPR 1B.2	Found within woodland and grassland habitats on relatively steep, south-facing slopes with granitic soils. Often found on roadsides. Elevations 400 to 1,500 ft.; blooms year-round.	<b>Absent.</b> Suitable habitat for the Winter's sunflower is absent from the project site, and the site is situated below this species' elevational distribution.
California satintail ( <i>Imperata brevifolia</i> )	CRPR 2B.1	Found in wetland seeps and riparian areas within various types of scrub, chaparral, and desert communities up to 4,000 feet in elevation. Blooms September-May.	<b>Absent.</b> Suitable habitat for this species is absent from the project site.
Forked hare-leaf ( <i>Lagophylla dichotoma</i> )	CRPR 1B.1	Occurs in woodland and valley and foothill grassland habitats, sometimes in clay soils, elevations typically from 600 to 1,100 feet. Blooms April-May.	<b>Absent.</b> Suitable habitat for the forked hare-leaf is absent from the project site, and the site is situated below this species' typical elevational distribution.
Alkali-sink goldfields ( <i>Lasthenia chrysantha</i> )	CRPR 1B.1	Found in alkaline vernal pools in the southern Sacramento Valley and San Joaquin Valley. Elevations up to 650 ft.; blooms February-June.	<b>Absent.</b> Suitable habitat for this species is absent from the project site.
Alkali-sink goldfields ( <i>Lasthenia chrysantha</i> )	CRPR 1B.2	Found on dry slopes, often on decomposed granite, within cismontane woodlands and	<b>Absent.</b> Suitable habitat for Madera leptosiphon is absent from the project site, and the site is situated

		lower montane coniferous forests. May occur in disturbed locations such as roadcuts (CDFW 2023, iNaturalist 2023). Elevations between 1,000 and 4,200 ft.; blooms April – May.	below this species' elevational distribution.
Sanford's arrowhead ( <i>Sagittaria sanfordii</i> )	CRPR 1B.2	Occurs in shallow freshwater marshes, ponds, sloughs, and ditches of the Central Valley and Sierra Nevada foothills up to 2,100 ft. in elevation. Blooms May-October.	<b>Absent.</b> Suitable aquatic habitat for the Sanford's arrowhead is absent from the project site. The site's artificial basin does not have an inundation regime that would support this species.
<b>Animals</b>			
Crotch's bumblebee ( <i>Bombus crotchii</i> )	CCE	Once common in the Central Valley, this species is now absent from most of it, particularly in the central portion of its historic range. Where present, it is associated with open grassland and scrub habitats, where it relies on food plants of the <i>Asclepias</i> , <i>Chaenactis</i> , <i>Lupinus</i> , <i>Medicago</i> , <i>Phacelia</i> , and <i>Salvia</i> genera (Williams et al. 2014).	<b>Unlikely.</b> This species is unlikely to occur in the matrix of residential and intensive agricultural uses that characterizes the project vicinity. In fact, it is generally now thought to be absent from the valley floor.
Valley elderberry longhorn beetle (VELB) ( <i>Desmocerus californicus dimorphus</i> )	FT	Lives in mature elderberry shrubs of California's Central Valley and Sierra foothills, generally along waterways and in floodplains.	<b>Absent.</b> Current accepted VELB distribution does not include the San Joaquin Valley south of Merced County.
Vernal pool fairy shrimp ( <i>Branchinecta lynchi</i> )	FT	Occurs in vernal pools, clear to tea-colored water in grass or mud-bottomed swales, and basalt depression pools.	<b>Absent.</b> Suitable habitat for this species is absent from the project site.
California tiger salamander (CTS) ( <i>Ambystoma californiense</i> )	FT, CT	Found primarily in annual grasslands; requires vernal pools for breeding and rodent burrows for aestivation. Although most CTS aestivate within 0.4 mile of their breeding pond, outliers may aestivate up to 1.3 miles away (Orloff 2011).	<b>Absent.</b> The site is situated in a matrix of residential and intensive agricultural uses within which this species would not have been able to persist. Suitable breeding habitat for the CTS is absent from the project site itself, and from surrounding lands within a distance that would enable individuals of this species to access the site for aestivation. The closest extant occurrences of this species

			in the CNDDDB are more than 9 miles to the north in the lower Sierra foothills.
Foothill yellow-legged frog – south Sierra DPS ( <i>Rana boylei pop. 5</i> )	FE, CE	Found in or near rocky streams in a variety of habitats. Use submerged rocks and debris for cover. Requires gravel or rocks in moving water near stream margins for reproduction.	<b>Absent.</b> Stream habitat needed to support this species is absent from project site and adjacent lands.
Western spadefoot ( <i>Spea hammondi</i> )	FPT, CSC	Occurs in grasslands of San Joaquin Valley, where it breeds in vernal pools or other seasonal wetlands and aestivates in underground refugia such as rodent burrows. Wetland features must hold water for a minimum of 30 days to support reproduction by this species (California Herps 2024). Baumberger et al. (2019) recorded a maximum distance of around 890 feet between breeding and aestivation sites.	<b>Absent.</b> The site is situated in a matrix of residential and intensive agricultural uses within which this species would not have been able to persist. Although the site’s artificial basin may occasionally pond water for a sufficient duration to support spadefoot reproduction, it was constructed less than 20 years ago, at a time when the larger landscape was already unsuitable for this species and colonization would not have been possible. The closest CNDDDB occurrences of this species are more than 10 miles to the north and east of the site in the lower Sierra foothills.
Western pond turtle ( <i>Actinemys marmorata</i> )	FPT, CSC	Occurs in ponds, lakes, rivers, creeks, marshes, and irrigation ditches with abundant vegetation, and either rocky or muddy bottoms. Logs, rocks, cattail mats, and exposed banks are required for basking. Eggs are deposited in a variety of soil types on shore.	<b>Unlikely.</b> Suitable aquatic habitat for the western pond turtle is absent from the project site and adjacent lands. The site’s artificial basin does not have an inundation regime that would support this species.
Swainson’s hawk ( <i>Buteo swainsoni</i> )	CT	This breeding migrant to California nests in mature trees in riparian areas and oak savannah, and occasionally in lone trees at the margins of agricultural fields. Requires adjacent suitable foraging areas such as grasslands or alfalfa fields supporting rodent populations.	<b>Possible.</b> Swainson’s hawks are occasionally sighted in the Sanger area, and an active nest was documented approximately 1.5 miles north of the project site in 2020 (eBird 2024). Individuals of this species may forage on site from time to time. The site’s citrus trees would not support Swainson’s hawk nesting, but individuals have some potential to

			nest on nearby rural residential properties.
Western yellow-billed cuckoo ( <i>Coccyzus americanus occidentalis</i> )	FT, CE	Frequents valley foothill and desert riparian habitats in scattered locations in California.	<b>Absent.</b> This species has been extirpated from the project vicinity.
Least Bell's vireo ( <i>Vireo bellii pusillus</i> )	FE, CE	This breeding migrant nests in dense, early-successional riparian vegetation, and forages in adjacent chaparral and coastal sage scrub. Winters in Mexico and Central America.	<b>Absent.</b> Suitable habitat for this species is absent from the project vicinity.
Tricolored blackbird ( <i>Agelaius tricolor</i> )	CT	Nests colonially near fresh water in dense cattails or tules, in thickets of willows or shrubs, and increasingly in grain fields. Forages in grassland and cropland areas.	<b>Possible.</b> Tricolored blackbirds may occasionally forage on the project site, but nesting habitat is absent from the site and surrounding lands.
San Joaquin kit fox (SJKF) ( <i>Vulpes macrotis mutica</i> )	FE, CT	Frequents desert alkali scrub and annual grasslands and may forage in adjacent agricultural habitats. Utilizes enlarged ground squirrel burrows as denning habitat. May become adapted to urban environments, as has occurred in the cities of Bakersfield, Taft, and Coalinga.	<b>Unlikely.</b> This species is extremely uncommon in the project vicinity; there is only one CNDDDB occurrence of the SJKF within a 10-mile radius of the site, and it is historical in nature, mapped generally to the Sanger area sometime in the 1980s. The site is situated in a matrix of residential and municipal developments, orchards, and other land uses generally incompatible with kit fox ecology. There is no known record of urban-adapted kit foxes in or around Sanger. While portions of the project site are theoretically suitable for kit fox foraging and denning, this species is highly unlikely to occur in the project vicinity such that it would be able to access the site.
Northern California legless lizard ( <i>Anniella pulchra</i> )	CSC	Occurs in sparsely vegetated areas of beach dunes, chaparral, pine-oak woodlands, desert scrub, sandy washes, and stream terraces with sycamores, cottonwoods, or oaks. Requires moist soils.	<b>Absent.</b> The project site does not contain suitable habitat for the northern California legless lizard.

Coast horned lizard ( <i>Phrynosoma blainvillii</i> )	CSC	Ranges from the central and southern California coast inland through the western Sierra Nevada, where it is found in grassland and open areas within woodland and forest habitats. Often found in sandy areas including washes and floodplains.	<b>Absent.</b> The project site does not contain suitable habitat for the coast horned lizard.
California glossy snake ( <i>Arizona elegans occidentalis</i> )	CSC	Ranges from the East Bay Area south through the inner Coast Ranges, southwestern San Joaquin Valley, and Southern California coast into Baja California. Inhabits arid scrub, rocky washes, grasslands, and chaparral, where it forages nocturnally, hiding in underground burrows during the day. Prefers loose, sandy soils.	<b>Absent.</b> The project site is outside of the current distribution of this species (California Herps 2024).
Burrowing owl ( <i>Athene cunicularia</i> )	CSC	Frequents open, dry annual or perennial grasslands, deserts, and scrublands characterized by low growing vegetation. Dependent upon burrowing mammals, most notably the California ground squirrel, for nest burrows.	<b>Unlikely.</b> The project site is situated on the outskirts of Sanger, in a landscape dominated by residential and municipal development, orchards, and other uses incompatible with burrowing owl ecology. There are no known sightings of this species in the project vicinity; the closest documented occurrences in eBird and the CNDDDB are 7 to 9 miles away. While portions of the project site are theoretically suitable for burrowing owl foraging and nesting, this species is highly unlikely to occur in the project vicinity such that it would be able to access the site.
Pallid bat ( <i>Antrozous pallidus</i> )	CSC	Found in grasslands, chaparral, and woodlands, where it feeds on ground- and vegetation-dwelling arthropods, and occasionally takes insects in flight. Prefers to roost in rock crevices, but many also use tree cavities, caves, bridges, and buildings.	<b>Possible.</b> The pallid bat could forage on or over the site. The site's citrus trees do not appear to provide roosting habitat for this species, and no roosting on site is expected.
American badger ( <i>Taxidea taxus</i> )	CSC	Found in drier open stages of most shrub, forest, and	<b>Unlikely.</b> The site's disturbed nature and setting make it highly

herbaceous habitats with friable soils. Utilize subterranean burrows, usually self-dug, for rest and reproduction.

unlikely to be occupied or utilized by American badgers.

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

STATUS CODES

FE Federally Endangered	CE California Endangered
FT Federally Threatened	CT California Threatened
FC Federal Candidate	CCE California Candidate Endangered
FPT Federal Proposed Threatened	CFP California Fully Protected
	CSC California Species of Special Concern
	CR California Rare

CRPR CODES

1A Plants Presumed Extinct in California 2B Plants Rare, Threatened, or Endangered in California and elsewhere  
 1B Plants Rare, Threatened, or Endangered in California, but more common elsewhere

- 0.1 – Seriously Threatened
- 0.2 – Moderately Threatened
- 0.3 – Not Very Threatened in California

Source: Appendix B

**Special-Status Species**

**SPECIAL-STATUS PLANT SPECIES**

The site consisted of a citrus orchard, an empty field, an artificial agricultural water retention basin, agricultural access roads, and other areas modified for human use. It was primarily vegetated with non-native grasses and forbs common in agricultural landscapes of the San Joaquin Valley.

Thirteen special status plant species have been documented in the general vicinity of the Project site as shown in Table 3.4.4-1. All 13 special status plant species are considered absent from or unlikely to occur on the project site due to an absence of suitable habitat and/or soils, the site being situated outside of the species’ distribution, or a combination thereof. Therefore, the Project is not anticipated to negatively impact special status plant species and impacts would be less than significant.

**SPECIAL-STATUS WILDLIFE SPECIES**

Eighteen special status animal species have been documented in the general vicinity of the project site, or are known to occur regionally (Table 3.4.4-1). Of these, 15 are considered absent from or unlikely to occur on the site due to the absence of suitable habitat, the site’s urban setting and other landscape factors, and/or the site’s being situated outside of the species’ known distribution. These comprise the Crotch bumblebee (*Bombus crotchii*),

valley elderberry longhorn beetle (*Desmocerus californicus dimorphus*), vernal pool fairy shrimp (*Branchinecta lynchi*), California tiger salamander (*Ambystoma californiense*), foothill yellow-legged frog (*Rana boylei*), western spadefoot (*Spea hammondi*), western pond turtle (*Actinemys marmorata*), western yellow-billed cuckoo (*Coccyzus americanus occidentalis*), least Bell's vireo (*Vireo bellii pusillus*), San Joaquin kit fox (*Vulpes macrotis mutica*), northern California legless lizard (*Anniella pulchra*), coast horned lizard (*Phrynosoma blainvillii*), California glossy snake (*Arizona elegans occidentalis*), burrowing owl (*Athene cunicularia*), and American badger (*Taxidea taxus*). Although these species are not expected to be affected by the Project directly or indirectly, the Project would implement MM BIO-1 through MM BIO-6, which would protect special status species that are known to be in the area. With implementation of these mitigation measure, Project impacts are considered less than significant

Two special status animal species, the tricolored blackbird (*Agelaius tricolor*) and pallid bat (*Antrozous pallidus*), have the potential to forage on the site from time to time but would not nest or roost on or near enough to the site that they could be vulnerable to construction-related injury, mortality, or reproductive failure (see Table 3.4.4-1). Individuals of these species are unlikely to be injured or killed by construction activities because they are highly mobile while foraging and would be expected to simply avoid active work areas. The Project would not adversely affect any of these species through loss of foraging habitat. The site does not offer unique habitat for any of these species, nor is it likely to represent an important part of any individual foraging range, given its disturbed nature and urban setting. Similar and higher quality habitats are regionally abundant. For these reasons, impacts to the tricolored blackbird and pallid bat are considered less than significant.

The remaining species, Swainson's hawk and other migratory avian species protected by the Migratory Bird Treaty Act and California Fish and Game Code have the potential to utilize the site for nesting habitat. Large trees suitable for raptor nesting are absent from the Project site itself but occur on adjacent lands; these could support nesting by common species such as the red-tailed hawk, great-horned owl (*Tyto alba*), and possibly also the Swainson's hawk (*Buteo swainsoni*), a California Threatened species. If birds or raptors are nesting on or near the site at the time of future vegetation removal activities or residential buildout, individual birds could be killed or disturbed such that they would abandon their nests. Construction-related mortality of nesting birds and construction-related disturbance leading to nest abandonment are potentially significant impacts of the Project. Moreover, such incidents would constitute violations of the Migratory Bird Treaty Act, California Fish and Game Code, and, in the case of the Swainson's hawk, the California Endangered Species Act. The Project would implement MM BIO-1 and MM BIO-4 through MM BIO-7, which would protect special status migratory and raptor avian species that are known to be in the area and educate construction crews regarding federal laws protecting avian species. With implementation of these mitigation measure, Project impacts are considered less than significant

Swainson's hawks are not expected to be adversely affected by Project-related loss of habitat. Nesting habitat is altogether absent, and potential foraging habitat is limited to the site's empty field and, when dry, the artificial basin. Collectively, these areas encompass approximately 40 acres. Situated as they are in a matrix of residential and municipal

development, orchards, and other uses incompatible with Swainson's hawk foraging ecology, they are expected to be visited only occasionally by individuals of this species and are unlikely to represent an important part of any individual foraging range. Similar or higher quality foraging habitat for this species is regionally abundant. To reduce potential Project impacts to nesting birds and raptors including the Swainson's Hawk, mitigation measures as recommended in the BE would be implemented. These measures include the use of preconstruction surveys if construction will occur during the nesting season (MM BIO-4), and avoidance of active nests should they be discovered in or near the work area through the establishment of construction free buffers (MM BIO-5). Implementation of the mitigation measures would reduce Project impacts to a less than significant level.

**MITIGATION MEASURE(S)**

**MM BIO-1:** Prior to ground-disturbing activities, a qualified wildlife biologist shall conduct a biological clearance survey between 14 and 30 days prior to the onset of construction.

The clearance survey shall include walking transects to identify presence of San Joaquin kit fox, burrowing owl, nesting birds, and other special-status species. The pre-construction survey shall be walked by no greater than 30-foot transects for 100 percent coverage of the Project and a 50-foot buffer, where feasible. If no evidence of special-status species is detected, no further action is required except MM BIO-7 shall be implemented. A copy of the pre-construction survey report shall be submitted to the lead agency as evidence of compliance.

**MM BIO-2** The following avoidance and minimization measures shall be implemented during all phases of the Project to reduce the potential for impact from the Project. They are modified from the *U.S. Fish and Wildlife Service Standardized Recommendations for Protection of the Endangered SJKF Prior to or During Ground Disturbance* (USFWS 2011, Appendix F).

- a. All food-related trash items such as wrappers, cans, bottles, and food scraps shall be disposed of in securely closed containers. All food-related trash items such as wrappers, cans, bottles, and food scraps shall be disposed of in securely closed containers and removed at least once a week from the construction of the Project site.
- b. Construction-related vehicle traffic shall be restricted to established roads and predetermined ingress and egress corridors, staging, and parking areas. Vehicle speeds shall not exceed 20 miles per hour (mph) within the Project site.
- c. To prevent inadvertent entrapment of kit fox or other animals during construction, the contractor shall cover all excavated, steep-walled holes or trenches more than two feet deep at the close of each workday with plywood or similar materials. If holes or trenches cannot be covered, one or more escape ramps constructed of earthen fill or wooden planks shall be installed in the trench. Before such holes or trenches are filled, the contractor shall thoroughly inspect them for entrapped animals. All construction-related pipes, culverts, or similar structures with a diameter of four

inches or greater that are stored on the Project site shall be thoroughly inspected for wildlife before the pipe is subsequently buried, capped, or otherwise used or moved in any way. If at any time an entrapped or injured kit fox is discovered, work in the immediate area shall be temporarily halted, and USFWS and CDFW shall be consulted.

- d. Kit foxes are attracted to den-like structures such as pipes and may enter stored pipes and become trapped or injured. All construction pipes, culverts, or similar structures with a diameter of four inches or greater that are stored at a construction site for one or more overnight periods shall be thoroughly inspected for kit foxes before the pipe is subsequently buried, capped, or otherwise used or moved in any way. If a kit fox is discovered inside a pipe, that section of pipe shall not be moved until the USFWS and CDFW have been consulted. If necessary, and under the direct supervision of the biologist, the pipe may be moved only once to remove it from the path of construction activity until the fox has escaped.
- e. No pets, such as dogs or cats, shall be permitted on the Project sites to prevent harassment, mortality of kit foxes, destruction of dens.
- f. Use of anti-coagulant rodenticides and herbicides in project sites shall be restricted. This is necessary to prevent primary or secondary poisoning of kit foxes and the depletion of prey populations on which they depend. All uses of such compounds shall observe labels and other restrictions mandated by the U.S. Environmental Protection Agency, California Department of Food and Agriculture, and other State and federal legislation, as well as additional Project-related restrictions deemed necessary by the USFWS and CDFW. If rodent control must be conducted, zinc phosphide shall be used because of the proven lower risk to kit foxes.
- g. A representative shall be appointed by the Project proponent who will be the contact source for any employee or contractor who might inadvertently kill or injure a kit fox or who finds a dead, injured, or entrapped kit fox. The representative shall be identified during the employee education program, and their name and telephone number shall be provided to the USFWS.
- h. The Sacramento Fish and Wildlife Office of USFWS and CDFW shall be notified in writing within three working days of the accidental death or injury to a SJKF during Project-related activities. Notification must include the date, time, and location of the incident or of the finding of a dead or injured animal and any other pertinent information. The USFWS contact is the Chief of the Division of Endangered Species at the addresses and telephone numbers below. The CDFW contact can be reached at (559) 243-4014 and [R4CESA@wildlifeca.gov](mailto:R4CESA@wildlifeca.gov).
- i. All sightings of the SJKF shall be reported to the California Natural Diversity Database (CNDDB). A copy of the reporting form and a topographic map clearly marked with

the location of where the kit fox was observed shall also be provided to the Service at the address below.

- j. Any Project-related information required by the USFWS or questions concerning the above conditions or their implementation may be directed in writing to the U.S. Fish and Wildlife Service at: Endangered Species Division, 2800 Cottage Way, Suite W 2605, Sacramento, California 95825-1846, phone: (916) 414-6620 or (916) 414-6600.
- k. New sightings of SJKF should be reported to the CNDDDB.

**MM BIO-3:** Within 14 days prior to the start of Project ground-disturbing activities, a pre-activity survey with a 500-foot buffer shall be conducted by a qualified biologist knowledgeable in the identification of these species and approved by the CDFW. If dens/burrows that could support any of these species are discovered during the pre-activity survey conducted under MM BIO-1, the avoidance buffers outlined below should be established. No work would occur within these buffers unless the biologist approves and monitors the activity.

#### San Joaquin Kit Fox

- Potential or Atypical den – 50 feet
- Known den – 100 feet
- Natal or pupping den – 500 feet, unless otherwise specified by CDFW

**MM BIO-4:** If construction is planned outside the nesting period for raptors (other than burrowing owl) and migratory birds (February 15 to August 31), no mitigation shall be required. If construction is planned during the nesting season for migratory birds and raptors, a pre-construction survey to identify active bird nests shall be conducted by a qualified biologist to evaluate the site and a 250-foot buffer for migratory birds and a 500-foot buffer for raptors. If nesting birds are identified during the survey, active raptor nests shall be avoided by 500 feet and all other migratory bird nests shall be avoided by 250 feet. Avoidance buffers may be reduced if a qualified on-site monitor determines that encroachment into the buffer area is not affecting nest building, the rearing of young, or otherwise affecting the breeding behaviors of the resident birds. Because nesting birds can establish new nests or produce a second or even third clutch at any time during the nesting season, nesting bird surveys shall be repeated every 30 days as construction activities are occurring throughout the nesting season.

No construction or earth-moving activity shall occur within a non-disturbance buffer until it is determined by a qualified biologist that the young have fledged (left the nest) and have attained sufficient flight skills to avoid project construction areas. Once the migratory birds or raptors have completed nesting and young have fledged, disturbance buffers will no longer be needed and may be removed, and monitoring may cease.

A copy of the pre-construction survey report shall be submitted to the lead agency as evidence of compliance.

**MM BIO-5:** A qualified biologist shall conduct a pre-construction survey on the project site and within 500 feet of its perimeter, where feasible, to identify the presence of the western burrowing owl. The survey shall be conducted between 14 and 30 days prior to the start of construction activities. If any burrowing owl burrows are observed during the pre-construction survey, avoidance measures shall be consistent with those included in the CDFW Staff Report on Burrowing Owl Mitigation (CDFG 2012). If occupied burrowing owl burrows are observed outside of the breeding season (September 1 through January 31) and within 250 feet of proposed construction activities, a passive relocation effort may be instituted in accordance with the guidelines established by the California Burrowing Owl Consortium (1993) and the California Department of Fish and Wildlife (2012). During the breeding season (February 1 through August 31), a 500-foot (minimum) buffer zone shall be maintained unless a qualified biologist verifies through non-invasive methods that either the birds have not begun egg laying and incubation or that juveniles from the occupied burrows are foraging independently and are capable of independent survival.

In addition, impacts to occupied burrowing owl burrows shall be avoided in accordance with the following table unless a qualified biologist approved by CDFW verifies through non-invasive methods that either: (1) the birds have not begun egg laying and incubation; or (2) that juveniles from the occupied burrows are foraging independently and are capable of independent survival.

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

**MM-BIO-6:** If construction work occurs after August 30 and ends before March 1 (outside of the breeding season), impacts to the Swainson's hawk would be avoided. Surveys would not be required for work conducted during this part of the year, and no further mitigation for nest disturbance is required.

1. *Protocol Surveys.* For work that begins between March 1 and August 30, a qualified biologist with expertise in Swainson's hawk shall conduct protocol surveys of potential nesting habitat within 0.5 mile of any construction activities prior to initiation of such activities. The project applicant shall conduct a protocol-level survey in conformance with the "Recommended Timing and Methodology for Swainson's Hawk Nesting Surveys in California's Central Valley," Swainson's Hawk Technical Advisory Committee (TAC)

(<https://www.wildlife.ca.gov/conservation/survey-protocols#377281284-birds>) (May 31, 2000) hereby incorporated by reference. This protocol prescribes minimum standards for survey equipment, mode of survey, angle and distance to tree, speed, visual and audible clues, distractions, notes and observations, and timing of surveys.

A written report with the pre-construction survey results must be provided to the Planning Department and CDFW within 30 days of the commencement of construction-related activities. The report shall include: the date of the report, authors and affiliations, contact information, introduction, methods, study location, including map, results, discussion, and literature cited.

If the required protocol surveys show there are no active Swainson's hawk nests within the 0.5-mile of construction activities, then no further mitigation for nest disturbance will be required. If protocol surveys show that there are no active Swainson's hawk nests within 10 miles of the site, then no further mitigation for foraging impacts will be required.

2. *Nest Avoidance.* If nesting Swainson's hawks are observed within 0.5-mile of the project site during the protocol surveys, the project applicant must implement CDFW pre-approved mitigation measures to avoid nest impacts during construction. These measures include:
  - a) All project-related activities with the potential to cause nest abandonment or forced fledging of young shall be avoided until the young have fledged.
  - b) If disturbances, habitat conversions, or other project-related activities, that may cause nest abandonment or forced fledging, are necessary, within the nest protection buffer zone (0.5-mile), monitoring of the nest site by a qualified raptor biologist, funded by the project applicant, shall be required to determine if the nest is abandoned. If the nest is abandoned, but the nestlings are still alive, the project proponent is required to fund the recovery and hacking, that is the controlled release of captive reared young, of the nestling.
  - c) The project applicant shall be required to coordinate with CDFW to determine if project activities with the potential to cause disturbance to nesting Swainson's hawks within the 0.5-mile buffer may proceed with a reduced nest buffer and an approved biological monitor. CDFW may authorize a reduced nest buffer with the presence of a monitoring biologist during construction activities to ensure that the nest is not disturbed. Routine disturbances such as agricultural activities, commuter traffic, and routine maintenance activities within 0.5-mile of an active nest are not prohibited.

**MM BIO-7:** Prior to ground-disturbance activities, or within one week of being deployed at the Project site for newly hired workers, all construction workers at the Project site shall attend a Construction Worker Environmental Awareness Training and Education Program developed and presented by a qualified biologist.

The Construction Worker Environmental Awareness Training and Education Program shall be presented by the biologist and shall include information on the life histories of special-status wildlife and plant species that may be encountered during construction activities, their legal protections, the definition of “take” under the Endangered Species Act, measures the project operator is implementing to protect the species, reporting requirements, specific measures that each worker must employ to avoid take of the species, and penalties for violation of the Act. Identification and information regarding special status or other sensitive species with the potential to occur on the Project site shall also be provided to construction personnel. The program shall include:

- An acknowledgment form signed by each worker indicating that environmental training has been completed.
- A copy of the training transcript and/or training video/CD, as well as a list of the names of all personnel who attended the training and copies of the signed acknowledgment forms, shall be maintained on-site for the duration of construction activities.

#### **LEVEL OF SIGNIFICANCE**

Impacts would be *less than significant with mitigation incorporated.*

**Impact #3.4.4b – Would the Project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?**

The Project site does not contain riparian habitat or sensitive natural communities (Live Oak Associates, Inc. 2024). The Project is not located within a river or an area that encompasses a river or potential floodplain and does not contain nor is near any riparian habitat. There are no anticipated impacts to sensitive natural communities as a result of the proposed Project. The proposed Project would be less than significant impacts to a riparian habitat or sensitive natural communities.

#### **MITIGATION MEASURE(S)**

No mitigation is required.

#### **LEVEL OF SIGNIFICANCE**

Impacts would be *less than significant.*

**Impact #3.4.4c – Would the Project 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?**

The U.S. Army Corps of Engineers (USACE) has regulatory authority over the Clean Water Act (CWA), as provided for by the EPA. The USACE has established specific criteria for the determination of wetlands based on the presence of wetland hydrology, hydric soils, and hydrophilic vegetation. There are no federally protected wetlands or vernal pools that occur within the Project site.

Wetlands, streams, reservoirs, sloughs, and ponds typically meet the criteria for federal jurisdiction under Section 404 of the CWA and State regulatory authority under the Porter-Cologne Water Quality Control Act. Streams and ponds typically meet the criteria for State regulatory authority under Section 1602 of the California Fish and Game Code.

The biological survey determined the location of an artificial irrigation basin. This water feature is not identified on the National Hydrologic Database or National Wetlands Inventory. This feature does not meet the definition of a Water of the U.S. or being regulated by the Regional Water Quality Control Board (RWQCB) or California Department of Fish and Wildlife (CDFW) as a water of the State. No other features on or near the Project that would meet the criteria for either federal or State jurisdiction. Accordingly, there are no wetlands or Waters of the U.S. occurring on the Project site. There would be no impact to Federally or State protected wetlands or waterways as a result of the proposed Project. Therefore, the Project would have no impact.

**MITIGATION MEASURE(S)**

No mitigation is required.

**LEVEL OF SIGNIFICANCE**

Impacts would be *no impact*.

**Impact #3.4.4d – Would the Project interfere substantially with the movement of any native resident or migratory fish or wildlife species, or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?**

Wildlife migratory corridors are described as a narrow stretch of land that connects two open pieces of habitat that would otherwise be unconnected. These routes provide shelter and sufficient food supplies to support wildlife species during migration. Movement corridors generally consist of riparian, woodlands, or forested habitats that span contiguous acres of undisturbed habitat and are important elements of resident species' home ranges.

The Project site does not contain or adjoin features likely to function as a wildlife movement corridor. No impacts to such corridors are anticipated. The Project will not restrict, eliminate, or significantly alter a wildlife movement corridor, wildlife core area, or Essential Habitat Connectivity area, either during construction or after the Project has been

constructed. Project construction will not substantially interfere with wildlife movements or reduce breeding opportunities.

The proposed Project would not interfere with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites. Therefore, the Project's impacts would be less than significant.

**MITIGATION MEASURE(S)**

No mitigation is required.

**LEVEL OF SIGNIFICANCE**

There would be *no impact*.

**Impact #3.4.4e – Would the Project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?**

The Project is subject to the City of Sanger General Plan and Fresno County General Plan that include goals and policies for protection of listed plant and wildlife species, wetlands, and other sensitive biological resources. The Project will implement measures such as those listed above (Mitigation Measures MM BIO-1 through BIO-7) to remain compliant with the General Plans. Therefore, implementation of the proposed Project would have no conflict related to any adopted local policies or ordinances protecting biological resources.

**MITIGATION MEASURE(S)**

Implementation of MM BIO-1 and BIO-7.

**LEVEL OF SIGNIFICANCE**

There would be *less than significant with mitigation incorporated*.

**Impact #3.4.4f – Would the Project conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan?**

The Project is not located within any Natural Community Conservation Plan or any other local, regional, or State Conservation Plan. With mitigation, the proposed Project would not conflict with the provisions of any adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State Habitat Conservation Plan.

**MITIGATION MEASURE(S)**

No mitigation is required.

**LEVEL OF SIGNIFICANCE**

Impacts would be *less than significant*.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
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**3.4.5 - CULTURAL RESOURCES**

Would the Project:

a. Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Discussion**

The discussion below is based on the Cultural Resource Study and Evaluation completed for the Project, attached as Appendix C (Applied EarthWorks, Inc. 2025).

**Impact #3.4.5a – Would the Project cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5?**

For this study, a records search at the Southern San Joaquin Valley Information Center (SSJVIC) of the California Historical Resources Information System (CHRIS) was conducted; desktop research to better understand the history of land use in the Project area; a search of the Native American Heritage Commission’s (NAHC) Sacred Lands File and nongovernmental outreach to local tribes and individuals; an intensive pedestrian survey of a 156.1-acre study area, that encompasses the 78.2-acre Project area, to identify archaeological and historical built environment cultural resources; and an evaluation of one newly discovered archaeological site for listing in the CRHR. Although this report documents the conditions and findings of the entire study area, City permitting and CEQA compliance is only necessary for the 78.2-acre Project area.

The SSJVIC records search reported no previously recorded cultural resources or previous cultural resource studies conducted in the study area; however, the search reported five previous cultural resource studies and two known cultural resources within the 0.5-mile search radius. A NAHC Sacred Lands Files search revealed negative results within and near the study area. The NAHC supplied a list of tribal representatives to be contacted for information regarding locations of sites of cultural and spiritual significance in the study area. An intensive archaeological pedestrian survey of the 156.1-acre study area between

March 13 and 15, 2024, and returned on April 8, 2024, to formally record all identified cultural resources. The survey discovered one historic-era refuse scatter (AE-4580-01H) containing glass, ceramic, and metal artifacts related to domestic use and three historic-era isolated artifacts.

It was found that the source of the scatter cannot be clearly identified, it lacks clear association and lacks a clear temporal focus and the ability to address research questions associated with agricultural development of homesteading in the early and mid-twentieth century in Sanger. For that reason this cultural resource is not eligible for listing in the CRHR. Therefore, it was concluded that there are no historical resources within the Project area that could be impacted by the proposed development.

However, if cultural resources are encountered during construction activities within any portion of the Project area, all work within 50 feet of the find should be halted until a qualified archaeologist can identify the discovery and assess its significance.

Although the components of the Project are within the existing disturbed sites, unknown historical resources may be discovered during ground-disturbing activities. In order to account for unanticipated discoveries and the potential to impact previously undocumented or unknown resources, the following mitigation measures are recommended. With the implementation of MM CUL-1, impacts under this criterion would be less than significant with mitigation. With the implementation of the mitigation measures, impacts would be less than significant.

**MITIGATION MEASURE(S)**

**MM CUL-1:** If prehistoric or historic-era cultural materials are encountered during construction activities, all work in the immediate vicinity of the find shall halt until a qualified archaeologist can evaluate the find and make recommendations. Cultural resource materials may include prehistoric resources such as flaked and ground stone tools and debris, shell, bone, ceramics, and fire-affected rock, as well as historic resources such as glass, metal, wood, brick, or structural remnants. If the qualified archaeologist determines that the discovery represents a potentially significant cultural resource, additional investigations may be required to mitigate adverse impacts from Project implementation. These additional studies may include avoidance, testing, and evaluation or data recovery excavation. Implementation of the mitigation measure below would ensure that the proposed Project would not cause a substantial adverse change in the significance of a historical resource.

**LEVEL OF SIGNIFICANCE**

Impacts would be *less than significant with mitigation incorporated.*

**Impact #3.4.5b – Would the Project cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5?**

See discussion of Impact #3.4.5a above.

Although unlikely, there is a chance that trenching and grading activities could unearth previously unknown archaeological resources. Implementation of MM CUL-2 would ensure that potential impacts associated with archaeological cultural resources during the Project-related activities phase would be less than significant. With the implementation of these mitigation measures, impacts would be less than significant.

**MITIGATION MEASURE(S)**

Implementation of MM CUL-1

**CUL-2:** In the event that buried prehistoric archaeological resources are discovered during excavation and/or construction activities, construction shall stop in the immediate vicinity of the find and a qualified archaeologist shall be consulted to determine whether the resource requires further study. The qualified archaeologist shall make recommendations to the developer and City on the measures that shall be implemented to protect the discovered resources, including but not limited to excavation of the finds and evaluation of the finds in accordance with Section 15064.5 of the CEQA Guidelines.

If the resources are determined to be unique prehistoric archaeological resources as defined under Section 15064.5 of the CEQA Guidelines, mitigation measures shall be identified by the monitor and required to the developer and City. Appropriate measures for significant resources could include avoidance or capping, incorporation of the site in green space, parks, or open space, or data recovery excavations of the finds. No further grading shall occur in the area of the discovery until the lead agency approves the measures to protect these resources.

Any prehistoric archaeological artifacts recovered as a result of mitigation shall be provided to a City-approved institution or person who is capable of providing long-term preservation to allow future scientific study.

**LEVEL OF SIGNIFICANCE**

Impacts would be *less than significant with mitigation incorporated.*

**Impact #3.4.5c – Would the Project disturb any human remains, including those interred outside of formal cemeteries?**

There are no known cemeteries or burials on or near the Project. Although unlikely, subsurface construction activities, such as trenching and grading, associated with the proposed Project could potentially disturb previously undiscovered human burial sites. Accordingly, this is a potentially significant impact. Although considered unlikely, subsurface construction activities could cause a potentially significant impact to previously undiscovered human burial sites. The cultural resources and Sacred Lands File records

searches did not indicate the presence of human remains, burials, or cemeteries within or in the vicinity of the Project site. No human remains have been discovered at the Project site, and no burials or cemeteries are known to occur within the area of the site.

However, if human remains are uncovered during ground-disturbing activities, all work shall immediately cease within 100 feet of the find and the Fresno County Coroner shall be contacted to evaluate the remains following the procedures and protocols set forth in CEQA Guidelines Section 15064.45(e)(1). If the remains are determined to be those of a Native American person, then the California Health and Safety Code 7050.5 and Public Resource Code 5097.98 require that the county coroner notify the NAHC within 24 hours of discovery. The NAHC will then identify the Most Likely Descendant, who will be afforded the opportunity to recommend treatment of the ancestral human remains.

Implementation of mitigation measure MM CUL-3 would ensure that the proposed Project would not directly or indirectly destroy previously unknown human remains. It is unlikely that the proposed Project would disturb any known human remains, including those interred outside of formal cemeteries. With the implementation of the mitigation measures, impacts would be less than significant.

**MITIGATION MEASURE(S)**

Implementation of MM CUL-1 and MM CUL-2.

**MM CUL-3:** If human remains are discovered during construction or operational activities, further excavation or disturbance shall be prohibited pursuant to Section 7050.5 of the California Health and Safety Code. The specific protocol, guidelines, and channels of communication outlined by the Native American Heritage Commission, in accordance with Section 7050.5 of the Health and Safety Code, Section 5097.98 of the Public Resources Code (Chapter 1492, Statutes of 1982, Senate Bill 297), and Senate Bill 447 (Chapter 44, Statutes of 1987), shall be followed. Section 7050.5(c) shall guide the potential Native American involvement, in the event of a discovery of human remains, at the direction of the county coroner.

**LEVEL OF SIGNIFICANCE**

Impacts would be *less than significant with mitigation incorporated.*

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
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**3.4.6 - ENERGY**

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? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?   | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

**Discussion**

This section is based on an Air Quality Study prepared for the Project (VRPA Technologies, Inc. 2024a), which is included in this document as Appendix A

**Impact #3.4.6a – Would the Project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation?**

**Construction**

Construction-related activities of the proposed Project would increase energy (in the form of fuel) consumption due to the operation of construction-related equipment. Construction-related activities will be short-duration and temporary in nature regarding gasoline and diesel fuel consumption. The increase in fuel (energy) consumption associated with construction-related activities would be minimal in comparison to Statewide and regional fuel consumption. Construction-related equipment and vehicles would be operated in accordance with energy efficiency standards required under the California Energy Code and State level policies adopted by the California Energy Commission (CEC) including the Energy Action Plan that prioritizes energy resources efficiency for California’s future energy needs, thereby minimizing energy consumption associated with the construction-related equipment and vehicles primarily powered by non-renewable fuels. This includes limiting idling time, ensuring that all equipment be maintained as recommended by manufacturer manuals, using electric equipment whenever possible in lieu of diesel- or gasoline-powered equipment, etc.

The Project would comply with the SJVAPCD requirements regarding the limitation of vehicle idling, and the use of fuel-efficient vehicles and equipment, to the extent feasible. Energy-saving strategies will be implemented where possible to further reduce the Project’s energy consumption, during the construction phase. Strategies being implemented include

those recommended by the California Air Resources Board (CARB) that may reduce both the Project's energy consumption, including diesel anti-idling measures, light-duty vehicle technology, usage of alternative fuels such as biodiesel blends and ethanol, and heavy-duty vehicle design measures to reduce energy consumption. While construction of the proposed Project will result in additional energy consumption, this energy use is not unnecessary or inefficient. This energy use is justified by the energy-efficient nature of the proposed Project and would be limited to the greatest extent possible through compliance with local, state, and federal regulations.

### **Operations**

Electricity service for the proposed Project would be provided by Pacific Gas and Electric Company (PG&E). Electricity consumption in Fresno County in 2022 was 8,384.41 millions of kilowatts per hour (GWh) and natural gas consumption attributable to Fresno County in 2022 was 319.44 million therms (mBTU) (California Energy Commission 2022a, California Energy Commission 2022b)

Energy estimates are summarized in Table 3.4.6-1 below:

**Table 3.4.6-1  
Estimated Energy Use**

	<b>Natural Gas (kBTU/yr)</b>	<b>Electricity (kWh/yr)</b>
Single-family Housing	12,739,900	4,226,200
<b>Fresno County Total</b>	<b>314,440,000</b>	<b>8,384,410,000</b>

Source: Appendix A

As shown in Table 3.4.6-1 above, the estimated natural gas use would be approximately four percent of the total natural gas use of Fresno County. With regard to electricity use, the proposed Project would result in approximately 0.05 percent of the Fresno County total electricity use. The proposed Project will be subject to energy conservation requirements in the California Energy Code (24 CCR Part 6, California's Energy Efficiency Standards for Residential and Nonresidential Buildings) and the California Green Building Standards Code (CALGreen) (24 CCR Part 11). Adherence to Title 24 requirements would ensure that the Project would not result in wasteful or inefficient use of nonrenewable resources due to operation.

Because construction-related energy use would be temporary and limited to the greatest extent feasible through consistency with federal, State, and local policies related to energy conservation, and operation of the Project will comply with all energy efficiency standards required under Title 24, Section 6, and these standards were specifically developed to be energy efficient for residential projects. The Project's construction and operation would not result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources and would result in a less than significant impact.

**MITIGATION MEASURE(S)**

No mitigation is required.

**LEVEL OF SIGNIFICANCE**

Impacts would be *less than significant*.

**Impact #3.4.6b – Would the Project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?**

Energy-saving strategies will be implemented where feasible to reduce the Project's energy consumption during the construction and post-construction phases. Strategies being implemented include those recommended by CARB that may reduce both the Project's construction energy consumption, including diesel anti-idling measures, light-duty vehicle technology, usage of alternative fuels such as biodiesel blends and ethanol, and heavy-duty vehicle design measures to reduce energy consumption. Additionally, as outlined in the SJVAPCD's GAMAQI, the Project includes recommendations to reduce energy consumption by shutting down equipment when not in use for extended periods, limiting the usage of construction equipment to eight cumulative hours per day, usage of electric equipment for construction whenever possible in lieu of diesel or gasoline powered equipment, and encouragement of employees to carpool to retail establishments or to remain on-site during lunch breaks.

As noted in Impact #3.4.6a, the Project will comply with applicable energy conservation requirements in the California Energy Code (24 CCR Part 6, California's Energy Efficiency Standards for Residential and Nonresidential Buildings) and CALGreen (24 CCR Part 11).

Based on this analysis, the Project would be consistent and not conflict with or obstruct a State or local plan related to renewable energy or energy consumption. Impacts would be less than significant.

**MITIGATION MEASURE(S)**

No mitigation is required.

**LEVEL OF SIGNIFICANCE**

Impacts would be *less than significant*.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
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### 3.4.7 - GEOLOGY AND SOILS

Would the Project:

a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii. Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii. Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv. Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems in areas where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## **Discussion**

This section is based on a Geotechnical Investigation (Krazan & Associates, Inc 2023a) and a Phase 1 Environmental Site Assessment (Krazan and Associates, Inc. 2023b) prepared for the Project, both of which is included in this document as Appendix D.

**Impact #3.4.7a(i) – Would the Project Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving – 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?**

Per the General Plan EIR, there are no known active faults located within the SOI and no Alquist-Priolo Earthquake Fault Zoning established within the Sanger Planning Area. Therefore, hazards from fault rupture hazards are considered unlikely (City of Sanger 2020). For reference, the Project is located approximately 72.5 miles northeast of the San Andreas Fault

The development of the Project is expected to comply with California Building Code (CBC) requirements that would ensure acceptable and safe building practices are implemented to reduce potential adverse effects from fault-related ground shaking. Therefore, with consideration of potentially active faults and mandatory compliance with CBC requirements, the Project would result in a less than significant impact.

### **MITIGATION MEASURE(S)**

No mitigation is required.

### **LEVEL OF SIGNIFICANCE**

Impacts would be *less than significant*.

**Impact #3.4.7a(ii) – Would the Project Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving – strong seismic ground shaking?**

See discussion of Impact #3.4.7a(i) above.

There are no known active earthquake faults or Alquist-Priolo fault zones that traverse the City. The City will ensure that all new construction complies with applicable local and State regulations to reduce any potentially significant impacts to structures resulting from strong seismic ground shaking at the Project site. Therefore, Project impacts would be less than significant.

### **MITIGATION MEASURE(S)**

No mitigation is required.

**LEVEL OF SIGNIFICANCE**

Impacts would be *less than significant*.

**Impact #3.4.7a(iii) – Would the Project Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving – seismic-related ground failure, including liquefaction?**

See discussion of Impact #3.4.7a(i) and (ii) above.

Liquefaction is defined as a phenomenon where earthquake-induced ground vibrations increase the pore pressure in saturated, granular soils until it is equal to the confining, overburdened pressure. When this occurs, the soil can completely lose its shear strength and enter a liquefied state. The possibility of liquefaction is dependent upon grain size, relative density, confining pressure, saturation of the soils, and intensity and duration of ground shaking. In order for liquefaction to occur, three criteria must be met: “low density,” coarse-grained (sandy) soils, a groundwater depth of less than about 50 feet, and a potential for seismic shaking from nearby large magnitude earthquakes. The approximate depth to groundwater at the Project site is approximately 64 feet below ground surface (Krazan and Associates, Inc. 2023b)

The Fresno County Multi-Hazard Mitigation Plan (FCMHMP) identifies the risk of liquefaction within the county as low because the soil types are unsuitable for liquefaction. The area’s low potential for seismic activity would further reduce the likelihood of liquefaction occurrence. Because the Project site is within an area of low seismic activity, and the types of soil associated with the Project area not suitable for liquefaction.

Based on this analysis, the Project would have a less-than-significant impact exposing people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction. Adherence to all applicable regulations would reduce or avoid any potential impacts to structures resulting from liquefaction at the Project site, and impacts would be less than significant.

**MITIGATION MEASURE(S)**

No mitigation is required.

**LEVEL OF SIGNIFICANCE**

Impacts would be *less than significant*.

**Impact #3.4.7a(iv) – Would the Project Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving – landslides?**

The Project site is relatively flat with no significant topological features. As such, there is no potential for rock falls or landslides to impact the Project in the event of a major earthquake, as the area has no dramatic elevation changes. The Project will not directly or indirectly

cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides. Therefore, the Project will have a less-than-significant impact.

**MITIGATION MEASURE(S)**

No mitigation is required.

**LEVEL OF SIGNIFICANCE**

Impacts would be *less than significant*.

**Impact #3.4.7b – Would the Project result in substantial soil erosion or the loss of topsoil?**

The Project sites and surroundings are mostly flat. Construction activities for the Project may disturb minimal amounts of soils during construction and would expose these disturbed areas to erosion by wind and water. However, since the Project is anticipated to disturb more than one acre of land and would be subject to National Pollutant Discharge Elimination System (NPDES) Program requirements. As such, it will have to develop a Stormwater Pollution Prevention Plan (SWPPP). A SWPPP must identify potential sources of erosion or sedimentation as well as identify and implement various types of Best Management Practices (BMP) to prevent erosion and sedimentation from occurring during construction. Typical BMPs intended to control erosion include sandbags, retention basins, silt fencing, street sweeping, etc.

As required per City of Sanger Municipal Code Section 82-201, the approval of a SWPPP to comply with the NPDES General Construction Permit will be applicable to the Project. The Project will comply with all grading requirements as outlined in Title 24 and Appendix J of the CBC. The Project is not expected to result in substantial erosion or the loss of topsoil with the incorporation of requirements of the approved SWPPP.

Once constructed, the Project will have both impermeable surfaces as well as permeable surfaces. Impermeable surface would include roadways, driveways, and building sites. Permeable surfaces would include any landscaped areas. The Project will comply with City of Sanger development standards for stormwater drainage. Therefore, the development of the Project would not result in substantial surface soils exposure to wind or water and would result in a less than significant impact.

**MITIGATION MEASURE(S)**

No mitigation is required.

**LEVEL OF SIGNIFICANCE**

Impacts would be *less than significant*.

**Impact #3.4.7c – Would the Project 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?**

See discussion in Impact #3.4.7a(iii) and 3.4.7a(iv) above.

There are no slopes on or near the site, and the Project would not expose the people or structures to significant risks from landslides.

The proposed Project will comply with all City and State regulations pertaining to construction, including CBC and the Sanger Municipal Code. In addition, the City is not in an area that is at high risk for landslides due to the low levels of elevation change. Compliance with the existing regulatory framework would be adequate to reduce any potential impacts to less than significant levels. Moreover, the Project will be designed by an engineer to resist potential side effects of spreading, subsidence, liquefaction, or collapse. Therefore, the impacts would be less than significant.

**MITIGATION MEASURE(S)**

No mitigation is required.

**LEVEL OF SIGNIFICANCE**

Impacts would be *less than significant*.

**Impact #3.4.7d – Would the Project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?**

The City of Sanger General Plan Update EIR identifies all soils within the Planning Area. Per the National Resources Conservation Service, (NRCS), Web Soil Survey, the Project site consists of Greenfield sandy loam, Exeter loam, Hanford sandy loam, Hanford fine sandy loam, and Tujunga sandy loam (Natural Resources Conservation Service 2024), which is consistent with the General Plan EIR. The shrink-swell potential is low if the soil has a linear extensibility of less than 3 percent; moderate if 3 to 6 percent; high if 6-9 percent; and very high if more than 9 percent. If the linear extensibility is more than 3, shrinking and swelling can cause damage to buildings, roads, and other structures and to plant roots. The linear extensibility of the soils within the Sanger planning area range from low to low-moderate (City of Sanger 2019).

With consideration of the soil type identified on the site, the Project would not be located on an expansive soil as there are no high shrink/swell potential soil within the City of Sanger. Additionally, the Project will comply with applicable CBC regulations for development within specific soils types and would result in less than significant impacts.

**MITIGATION MEASURE(S)**

No mitigation is required.

**LEVEL OF SIGNIFICANCE**

Impacts would be *less than significant*.

**Impact #3.4.7e – Would the Project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems in areas where sewers are not available for the disposal of wastewater?**

The proposed Project does not include private septic systems or alternative wastewater disposal systems. The Project will connect to the existing City sewer system for the disposal of generated wastewater during operations. The Project will comply with applicable City of Sanger development standards for connection to existing City sewer infrastructure. Therefore, the Project would have no impact.

**MITIGATION MEASURE(S)**

No mitigation is required.

**LEVEL OF SIGNIFICANCE**

There would be *no impact*.

**Impact #3.4.7f – Would the Project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?**

The City's General Plan EIR indicates there are no unique geologic features located in the Planning Area. Additionally, the discovery of paleontological resources in the Planning Area is considered unlikely.

However, the potential to discover paleontological resources in the City still exists. The City General Plan EIR noted adherence to PRC Section 21083.2 which requires all earth-disturbing work to be temporarily suspended or redirected until a qualified paleontologist has evaluated the nature and significance of the records in accordance with federal, State, and local guidelines. The Project site has previously been disturbed by past agricultural activities. Further ground-disturbing activities during construction, could potentially impact previously undiscovered paleontological resources or unique geologic features.

The implementation of MM GEO-1 would reduce potential impacts to a less-than-significant level. In addition, the General Plan FEIR policies and guidelines direct the City to require construction to stop immediately if cultural resources, including tribal, archaeological, or paleontological resources, are uncovered during grading or other on-site excavation activities until appropriate mitigation is implemented. Therefore, with MM GEO-1, the Project will have a less than significant impact.

**MITIGATION MEASURE(S)**

**MM GEO-1:** If any paleontological resources are encountered during ground-disturbance activities, all work within 25 feet of the find shall halt until a qualified paleontologist, as defined by the Society of Vertebrate Paleontology Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources (2010), can evaluate the find and make recommendations regarding treatment. Paleontological resource materials may include resources such as fossils, plant impressions, or animal tracks preserved in rock. The qualified paleontologist shall contact the Natural History Museum of Los Angeles County or another appropriate facility regarding any discoveries of paleontological resources.

If the qualified paleontologist determines that the discovery represents a potentially significant paleontological resource, additional investigations and fossil recovery may be required to mitigate adverse impacts from Project implementation. If avoidance is not feasible, the paleontological resources shall be evaluated for their significance. If the resources are not significant, avoidance is not necessary. If the resources are significant, they shall be avoided to ensure no adverse effects, or such effects must be mitigated. Construction in that area shall not resume until the resource-appropriate measures are recommended, or the materials are determined to be less than significant. If the resource is significant and fossil recovery is the identified form of treatment, then the fossil shall be deposited in an accredited and permanent scientific institution. Copies of all correspondence and reports shall be submitted to the Lead Agency.

**LEVEL OF SIGNIFICANCE**

Impacts would be *less than significant with mitigation incorporated.*

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
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**3.4.8 - GREENHOUSE GAS EMISSIONS**

Would the Project:

a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Discussion**

**Impact #3.4.8a – Would the Project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?**

CARB, in consultation with Metropolitan Planning Organizations (MPO) has provided each affected region with reduction targets for greenhouse gases (GHG) emitted by passenger cars and light trucks in the region for the years 2020 and 2035. For the Fresno COG region, CARB set targets at six (6) percent per capita decrease in 2020 and a thirteen (13) percent per capita decrease in 2035 from a base year of 2005. FCOG’s 2018 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), which was adopted in July 2022, projects that the Fresno County region would achieve the prescribed emissions targets.

In 2009, the SJVAPCD adopted the following guidance documents applicable to projects within the San Joaquin Valley:

- Guidance for Valley Land-use Agencies in Addressing GHG Emission Impacts for New Projects under CEQA (GAMAQI), and
- District Policy: Addressing GHG Emission Impacts for Stationary Source Projects Under CEQA When Serving as the Lead Agency.

This guidance and policy are the reference documents referenced in the SJVAPCD’s Guidance for Assessing and Mitigating Air Quality Impacts adopted in March 2015. Consistent with the District Guidance and District Policy above, SJVAPCD acknowledges the current absence of numerical thresholds, and recommends a tiered approach to establish the significance of the GHG impacts on the environment:

1. If a project complies with an approved GHG emission reduction plan or GHG mitigation program which avoids or substantially reduces GHG emissions within the geographic area in which the project is located, then the project would be determined to have a less than significant individual and cumulative impact for GHG emissions;
2. If a project does not comply with an approved GHG emission reduction plan or mitigation program, then it would be required to implement Best Performance Standards (BPS); and
3. If a project is not implementing BPS, then it should demonstrate that its GHG emissions would be reduced or mitigated by at least 29 percent compared to Business as Usual (BAU).

As estimated in the Air Quality and Greenhouse Gas Impact Assessment and shown in Table 3.4.8-1, the Project would generate 9396.43 Metric Tons of Carbon Dioxide Equivalent per year (MTCO<sub>2e</sub>/year) using an operational year of 2005, which includes area, energy, mobile, waste, and water sources. BAU is referenced in CARB's Assembly Bill (AB) 32 Scoping Plan as emissions projected to occur in 2020 if the average baseline emissions during the 2002-2004 period grew to 2020 levels, without control or Best Performance Standards (BPS) offsets. As a result, an estimate of the Project's operational emissions in 2005 were compared to operational emissions in 2020 in order to determine if the Project meets the 29% emission reduction. The SJVAPCD has reviewed relevant scientific information related to GHG emissions and has determined that they are not able to determine a specific quantitative level of GHG emissions increase, above which a project would have a significant impact on the environment, and below which would have an insignificant impact. As a result, the SJVAPCD has determined that projects achieving at least a 29% GHG emission reduction compared to BAU would be determined to have a less than significant individual and cumulative impact for GHG. Results of the analysis show that the Project's GHG emissions in the year 2020 is 7911.52 MTCO<sub>2e</sub>/year. This represents an achievement of 15.8% GHG emission reduction on the basis of BAU, which does not meet the 29% GHG emission reduction target. In the event that a local air district's guidance for addressing GHG impacts does not use numerical GHG emissions thresholds, at the lead agency's discretion, a neighboring air district's GHG threshold may be used to determine impacts. In December 2008, the South Coast Air Quality Management District (SCAQMD) Governing Board adopted the staff proposal for an interim GHG significance threshold for projects where the SCAQMD is lead agency. The SCAQMD guidance identifies a threshold of 10,000 MTCO<sub>2e</sub>/year for GHG for construction emissions amortized over a 30-year project lifetime, plus annual operation emissions.

**Table 3.4.8-1  
Estimated Project Greenhouse Gas Emissions**

	<b>CO<sub>2e</sub> (metric tons/yr)</b>
Construction Emissions	732.68
Operational Emissions (2005 BAU)	9,396.43
Operational Emissions (2020 BAU)	7,911.52

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Operational Emissions (CalEEMod estimates) 7,043.4

Source: Appendix C

In the decade after SCAQMD adopted the Interim GHG Significance Threshold, several new laws and executive orders were adopted that require additional reductions in years after 2020. For instance, Senate Bill 32 (Lara, 2016) requires that GHG emissions be 40% less than 1990 levels by 2030. More drastic still, Senate Bill 100 (de Leon, 2018) which was signed by the Governor recently requires 100% zero-carbon electricity by 2045. On the day SB 100 was signed into law, the Governor also signed Executive Order B-55-18 which commits California to total, economy-wide carbon neutrality by 2045. Clearly, the 2008 Guidance may be somewhat inadequate in producing a meaningful comparison by today's standards which propose a grand vision that, if achieved, would fundamentally change how business is conducted and citizens live in the State. Thus, as discussed in the most recent updates to the Scoping Plan, objectives of the Scoping Plan affect entire sectors of the economy and it no longer makes sense to evaluate GHG emissions on a project-level.

For these reasons, Project GHG emissions levels presented in Table 3.4.8-1 are primarily for disclosure purposes. The approach used by SCAQMD to assess GHG impacts recognizes that consumers of electricity and transportation fuels are, in effect, regulated by requiring providers and importers of electricity and fuel to participate in the GHG Cap-and-Trade Program and other Programs (e.g., low carbon fuel standard, renewable portfolio standard, etc.). Each such sector-wide program exists within the framework of AB 32 and its descendant laws the purpose of which is to achieve GHG emissions reductions consistent with the AB 32 Scoping Plan.

In summary, the Project would generate GHGs from electricity use and combustion of gasoline/diesel fuels, each of which is regulated near the top of the supply-chain. As such, each citizen of California (including the operator of the Project) will have no choice but to purchase electricity and fuels produced in a way that is acceptable to the California market. Thus, Project GHG emissions will be consistent with the relevant plan (i.e., AB 32 Scoping Plan). The Project would meet its fair share of the cost to mitigate the cumulative impact of global climate change because SHP is purchasing energy from the California market. Thus, the Project would have a less than significant impact on applicable GHG reduction plans.

Although construction of the proposed Project would result in emissions of GHGs, the Project as a whole is not expected to generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment. The Project would not generate cumulatively considerable GHG impacts, nor would it conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. The Project will also not conflict with any elements of the California Air Resources Board's 2008 Climate Change Scoping Plan. Therefore, the Project would have a less-than-significant impact.

#### **MITIGATION MEASURE(S)**

No mitigation is required.

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**LEVEL OF SIGNIFICANCE**

Impacts would be *less than significant*.

**Impact #3.4.8b – Would the Project conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?**

In 2006, the California State legislature adopted AB 32—The California Global Warming Solutions Act. AB 32 directs the state to reduce California GHG emissions to 1990 levels by 2020. It instructs CARB to establish a program of regulatory and market mechanisms to achieve GHG reductions and to implement a mandatory GHG reporting and verification program. In accordance with AB 32, the Climate Change Scoping Plan (Scoping Plan) outlines California’s strategy for achieving the 2020 GHG emissions limit outlined under the law. The 2022 Scoping Plan was updated with new strategies to achieve carbon neutrality by 2045 (California Air Resources Board 2022). The Project would generate GHGs from electricity use and combustion of gasoline/diesel fuels, each of which is regulated near the top of the supply-chain. As such, each citizen of California (including the operator of the Project) will have no choice but to purchase electricity and fuels produced in a way that is acceptable to the California market. Thus, Project GHG emissions will be consistent with the relevant plan (i.e., AB 32 Scoping Plan).

Project GHG emissions levels presented in Impact #3.4.8a above are primarily for disclosure purposes because impact analysis for the Project follows the approach certified by SCAQMD in the Final Negative Declaration for the Phillips 66 Los Angeles Refinery Carson Plant – Crude Oil Storage Capacity Project on December 12, 2014. The approach used by SCAQMD to assess GHG impacts from that project recognizes that consumers of electricity and transportation fuels are, in effect, regulated by requiring providers and importers of electricity and fuel to participate in the GHG Cap-and-Trade Program and other Programs (e.g., low carbon fuel standard, renewable portfolio standard, etc.). Each such sector-wide program exists within the framework of AB 32 and its descendant laws the purpose of which is to achieve GHG emissions reductions consistent with the AB 32 Scoping Plan.

As noted in Impact #3.4.8a above, the Project would not generate cumulatively considerable GHG impacts, nor would it conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. The Project will not result in the emissions of hydrofluorocarbons (HFC), perfluorocarbons (PFC), or sulfur hexafluoride (SF6), the other gases identified as GHG in AB32. The proposed Project will be subject to any regulations developed under AB32 as determined by CARB. Furthermore, the Project will be required to implement energy conservation regulations (Title 24) and Green Building Code standards. Therefore, Project impacts would be less than significant.

**MITIGATION MEASURE(S)**

No mitigation is required.

**LEVEL OF SIGNIFICANCE**

Impacts would be *less than significant*.

**3.4.9 - HAZARDS AND HAZARDOUS MATERIALS**

Would the Project:

	Potentially Significant Impact	Less than Significant 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Emit hazardous emissions or involve handling hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

## **Discussion**

The discussion below is based on the Phase I Environmental Site Assessment (ESA) completed for the Project, attached as Appendix D (Krazan and Associates, Inc. 2023b).

### **Impact #3.4.9a – Would the Project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?**

Construction of the Project would involve the temporary transport and use of minor quantities of hazardous materials such as fuels, oils, lubricants, hydraulic fluids, paints, and solvents. The types and quantities of hazardous materials to be used and stored on-site would not be of a significant amount to create a reasonably foreseeable upset or accident condition. The handling and transport of all hazardous materials on-site would be performed in accordance with all applicable federal, State, and local laws and regulations. Designated truck routes in the City of Merced include SR-180, Jensen Avenue, Bethel Avenue, Academy Avenue, Annadale Avenue, Newmark Road, Muscat Avenue, North Avenue, K Street, L Street and Central Avenue. The Sanger City Fire Department would respond to any hazardous materials incident and additional fire department units would respond as necessary.

A review of the EnviroStor database and the Geotracker database did not identify any active hazardous material site or hazardous material cleanup site in proximity of the Project site (California Department of Toxic Substances Control 2024, State Water Resources Control Board 2024).

## **Construction**

Minor amounts of hazardous and non-hazardous materials and waste would likely be transported to and from the Project site during the construction phase of the proposed Project. Any hazardous waste or debris that is generated during the construction of the proposed Project would be collected and transported away from the site and disposed of at an approved offsite landfill or other such facilities. In addition, sanitary waste generated during construction would be managed through portable toilets, which would be located at reasonably accessible onsite locations. Hazardous materials such as paint, bleach, water treatment chemicals, gasoline, oil, etc., may be used during construction. These materials are stored in appropriate storage locations and containers in the manner specified by the manufacturer and disposed of in accordance with local, federal, and State regulations. Residential and commercial construction generally utilize fewer hazardous chemicals or chemicals in relatively small quantities and concentrations compared to industrial uses. No significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous waste during the construction or operation of the new residential development would occur.

## **Operations**

Once constructed, the use of such materials as paint, bleach, etc., is considered common for residential developments. Residential developments are unlikely to have hazardous

materials stored or used in such quantities that would be considered a significant hazard. The Project itself will not generate or use hazardous materials outside health department requirements.

Based on the analysis above, Project construction and operation are not anticipated to result in significant impacts due to the transportation, use, or disposal of hazardous materials. Therefore, Project impacts would be less than significant.

**MITIGATION MEASURE(S)**

No mitigation is required.

**LEVEL OF SIGNIFICANCE**

Impacts would be *less than significant*.

**Impact #3.4.9b – Would the Project 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?**

See the discussion on Impact #3.4.9a above.

There is no evidence of recognized environmental conditions (REC), controlled RECs (CREC), or historical RECs (HREC) in connection with the subject site (Krazan and Associates, Inc. 2023b). A review of historical aerial photographs indicates that rural residential areas, including dwelling-type structures, barn type structures, and smaller outbuildings, were present in the southwestern, southeastern and southern portion of the subject site circa 1937.

There are no historical records or indication that an underground storage tank is located on the Project site. However, the Phase I ESA notes that although there is no evidence of the presence of an underground storage tank, a very low possibility of an unregistered underground storage tank (UST) can exist due to the historical nature of the site. Additionally, there are no records of a leaking underground storage tank on the Project site (State Water Resources Control Board 2024). Additionally, there are no records of a leaking underground storage tank on the Project site (State Water Resources Control Board 2024). Should an unknown underground tank be found during construction activities, Mitigation Measure MM HAZ-1 would require the developer to stop work in that area and contact the State Water Resources Control Board and the Fresno County Environmental Health Division to discuss the appropriate next steps for the safe procedure for removal activities.

Review of historical aerial photographs indicates that the subject site was in different stages of agricultural production from at least 1937 to present. Although the potential exists that environmentally persistent pesticides/herbicides may have been historically applied to crops grown on the subject site 1) no material evidence of the use of environmentally persistent pesticides/herbicides was obtained during the course of this assessment, and 2) it is anticipated that any environmentally persistent pesticides/herbicides potentially

located on site will be dislocated and diluted as a result of the grading and trenching operations which will be conducted in connection with the planned residential development of the property (Krazan and Associates, Inc. 2023b). Due to the historical use of the subject site for agricultural purposes, the potential exists for persistent pesticides and herbicides. Typically, this does not result in concentrations reported above regulatory screening levels and no further action is required.

If a septic system is identified during the planned development of the subject site, Mitigation Measure MM HAZ-2 would require the developer or contractor to stop work in that area and contact the Fresno County Environmental Health Division to determine the appropriate actions to be taken to properly abandoned/closed or removed in accordance with State and local guidelines.

Based on property owner interview, the subject site is currently connected to municipal portable water service and is not associated with an on-site water well. The majority of the subject site was utilized as agricultural land at least 1937 to present. Associated with these types of development are agricultural and domestic wells. If the existing water well and/or any additional water wells identified during the planned development of the subject site are Measure MM HAZ-3 would require the developer or contractor to stop work in that area and contact the Fresno County Environmental Health Division to determine the appropriate actions to be taken to properly abandoned/closed or removed in accordance with State and local guidelines.

Per the California Department of Toxic Substances Control (DTSC) Envirostor database, the Project site is not located on a listed hazardous materials/waste facility (California Department of Toxic Substances Control 2024). There are no active California Geologic Energy Management Division (CalGEM) identified oil or gas fields within the Project site (CalGEM 2024).

Consequently, the Project is not anticipated to create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions. As discussed above, there is no evidence of a significant environmental condition on the Project site that could potentially result in a significant impact. However, should an unknown UST, water well or septic system be uncovered during construction of the Project, implementation of MM HAZ-1 through MM HAZ-3 would reduce impacts that could result in upset or accidental hazardous material spill would be less than significant.

***MITIGATION MEASURE(S)***

**MM HAZ-1:** In the event unknown underground storage tank(s) are uncovered or damaged during excavation or grading activities, all work in that area shall cease. The State Water Resources Control Board (SWRCB) and the Fresno County Environmental Health Division shall be contacted to determine what appropriate remediation may be required, and to identify the appropriate requirements and approvals. A report of all communication and the determination made by the SWRCB and the County Health Division shall be submitted to the City.

**MM HAZ-2:** In the event an unknown septic system is uncovered or damaged during excavation or grading activities, all work in that area shall cease. The Fresno County Environmental Health Division shall be contacted to determine what appropriate remediation may be required, and to identify the appropriate requirements and approvals. A report of all communication and the determination made by the County Health Division shall be submitted to the City.

**MM HAZ-3:** In the event unknown water wells are uncovered or damaged during excavation or grading activities, all work in that area shall cease. The California Department of Water Resources and the California State Water Resources Control Board shall be contacted to determine what appropriate abandonment or remediation may be required, and to identify the appropriate requirements and approvals. A report of all communication and the determination made by the State agencies shall be submitted to the City.

**LEVEL OF SIGNIFICANCE**

Impacts would be *less than significant with mitigation incorporated.*

**Impact #3.4.9c – Would the Project emit hazardous emissions or involve handling hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?**

See Impacts #3.4.9a and b above.

The Project site is located adjacent to Sanger High School to the north. Under the City General Plan Land Use Map, there are no proposed school sites in vicinity of the Project site. Construction activities of the proposed Project will result in the temporary use of hazardous materials and or substances, such as lubricants and diesel fuel, during construction. Exhaust from construction and related activities is expected to be minimal and would not create a significant impact. If during construction an unknown UST, water well or septic system is uncovered, implementation of MM HAZ-1 through MM HAZ-3 would reduce impacts related to the release of hazardous materials to less than significant. Once constructed, the operation of the Project components would not be considered hazardous. Therefore, the impacts would be less than significant.

**MITIGATION MEASURE(S)**

Implementation of MM HAZ-1 through MM HAZ-3.

**LEVEL OF SIGNIFICANCE**

Impacts would be *less than significant with mitigation incorporated.*

**Impact #3.4.9d – Would the Project 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?**

See Impact 3.4.9b

An online search was conducted to identify hazardous waste locations on or near the Project site. The search indicated that there are no reported hazardous or toxic sites within the Project site (California Department of Toxic Substances Control 2024).

There is no data identifying any facilities in the vicinity that might reasonably be anticipated to emit hazardous air emissions or handle hazardous materials, substances, or wastes that might affect the proposed residential development. Therefore, impacts would be less than significant.

**MITIGATION MEASURE(S)**

No mitigation is required.

**LEVEL OF SIGNIFICANCE**

Impacts would be *less than significant*.

**Impact #3.4.9e – 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?**

The Project site is located approximately 7.5 miles west of the Reedley Municipal Airport and approximately 8.2 miles southeast of the Fresno Yosemite International Airport. The Project site is located outside of the airport influence area, as identified in the Fresno County Airport Land Use Compatibility Plan (ALUCP) (Fresno County Airport Land Use Commission 2018). Therefore, the Project is not within two miles of an airport and would not result in a safety hazard or excessive noise for people working in the Project area. As such, there would be no impact.

**MITIGATION MEASURE(S)**

No mitigation is required.

**LEVEL OF SIGNIFICANCE**

There would be *no impact*.

**Impact #3.4.9f – Would the Project impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?**

The 2024 FCMHMP identifies hazards present within the County, provides a risk assessment for the respective hazard, and adopts mitigation strategies to reduce risk. In addition to the FCMHMP, the Project will be required to comply with City safety requirements adopted in Fire Code and other code requirements for emergency response. These requirements will include the minimum emergency access requirements and fire suppression requirements.

The proposed Project would not inhibit the ability of local roadways to continue to accommodate emergency response and evacuation activities. Therefore, the Project would have a less-than-significant impact.

**MITIGATION MEASURE(S)**

No mitigation is required.

**LEVEL OF SIGNIFICANCE**

Impacts would be *less than significant*.

**Impact #3.4.9g – Would the Project Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?**

According to available data from Cal Fire, the Project site, is within a Local Responsibility Area (LRA) Unzoned Fire Hazard Severity Zone (Cal Fire 2007). The General Plan includes policies (Pages 5-7 through 5-8) that would protect the Project and the community from fire dangers that would be followed during the construction and operation of the Project. These policies include maintaining reasonable levels of accessibility and infrastructure support for fire suppression, disaster, and other emergency services, maintaining standards defined in the Fire Code, and enforcing nuisance abatement programs regarding weeds during the dry season.

Significant wildland fire hazards exist in the County primarily in the foothills of the Sierra Nevada where fuel loads can be high. Given the low fuel loads within the planning area, wildland fires would not have an impact on existing development or future development within the Sanger planning area (City of Sanger 2019).

The agricultural lands that surround the existing urbanized portions of the City and the Project site have a low level of wildland fire hazard, as they are not characterized as having a high fuel load. The threat of wildland fire hazard within the urbanized areas of the City is also low for the same reason.

Construction activities and the Project operation are not expected to increase the risk of wildfires on and adjacent to the Project site. The Project will comply with all applicable State and local standards as required by local fire codes. Therefore, the Project would have less than significant impacts.

**MITIGATION MEASURE(S)**

No mitigation is required.

**LEVEL OF SIGNIFICANCE**

Impacts would be *less than significant*.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
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### 3.4.10 - HYDROLOGY AND WATER QUALITY

Would the Project:

a.	Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b.	Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii.	Substantially increase the rate of amount of surface runoff in a manner which would result flooding on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv.	Impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d.	In flood hazard, tsunami, or seiche zones, risk release of pollutants due to Project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e.	Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### Discussion

The discussion below is based on the Water Supply Assessment (WSA) completed for the Project, attached as Appendix E (QK 2024).

**Impact #3.4.10a – Would the Project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface water quality?**

The proposed Project construction and groundbreaking activities have the potential to cause erosion, sedimentation, and discharge of construction debris from the Project site. Clearing of vegetation and grading activities, for example, could lead to exposed or stockpiled soils susceptible to peak stormwater runoff flows. Also, the compaction of soils by heavy equipment may minimally reduce the infiltration capacity of soils (exposed during construction) and increase runoff and erosion potential. The presence of significant amounts of raw materials for construction, including concrete and asphalt, may lead to stormwater runoff contamination. If uncontrolled, these materials could lead to water quality problems, including sediment-laden runoff, prohibited non-stormwater discharges, and ultimately the degradation of downstream receiving water bodies. As discussed previously, the Project would disturb more than one-acre and would be required to prepare a SWPPP and would ensure implementation of BMPs that address potential issues related to soil erosion and contaminated runoff. Implementing BMPs for construction activities, such as the use of straw waddle sandbags, silt fencing, swales, street sweeping, etc., will be implemented and would reduce stormwater runoff to a less-than-significant impact during construction activities.

The Project would be connected to the City of Sanger for sewer services and stormwater drainage. The improvements associated with the Project for connection to City of Sanger services would be subject to the City’s adopted improvement standards for sewer and stormwater infrastructure. Compliance with the adopted City improvement standards would result in a less than significant impact on waste discharge requirements associated with operation of the Project.

The Project’s surface or groundwater water quality impacts are expected to be less than significant with the approval of a SWPPP and would ensure BMPs for construction activities would be implemented and reduce potential impacts on water quality. As noted above, compliance with City improvement standards for sewer and stormwater drainage infrastructure and waste discharge requirements associated with operation of the Project impacts would be less than significant.

***MITIGATION MEASURE(S)***

No mitigation is required.

***LEVEL OF SIGNIFICANCE***

*Impacts would be less than significant.*

**Impact #3.4.10b – Would the Project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin?**

The City is located in the Kings Subbasin (DWR Subbasin 5-22.08), which is in the greater Tulare Lake hydrologic region (DWR Basin 5.22), and also within the larger San Joaquin Valley Groundwater Basin (QK 2024). The Kings Subbasin covers approximately 1,530 square miles. The Kings Subbasin is generally bounded: on the north by the San Joaquin River; on the west by the Fresno Slough; on the south by the Kings River and Cottonwood Creek; and on the east by the Sierra foothills.

Groundwater in the Basin is used for all water supply for the City. The city participates in and is a member of the South Kings Groundwater Sustainability Agency (SKGSA). SKGSA adopted a Groundwater Sustainability Plan on December 19, 2019.

The proposed water for the Project is located within the City SOI. The City has an estimated service population of approximately 26,617 people. In 2020, approximately 7,367 acre-feet (2,063 million gallons) of water was delivered to an estimated 6,973 water service connections of which approximately 61% of the water use is for residential services. The remainder are for commercial and industrial uses. The City currently utilizes local groundwater as its sole source of water supply. Groundwater is extracted by nine wells located within the city’s sphere of influence. In addition to production wells, the City has three surface storage structures.

Under the State Urban Water Management Planning Act, an urban water supplier providing water for municipal purposes to more than 3,000 customers or serving more than 3,000 acre-feet annually, is required to adopt an Urban Water Management Plan (UWMP) demonstrating water supply reliability in normal, single dry, and multiple dry water years.

Tables 3.4.10-1 through 3 show the normal year supply and demand comparison, the single dry year supply and demand comparison, and the multiple dry year supply and demand comparison.

**Table 3.4.10-1: Normal Year Supply and Demand Comparison**

	<b>2025</b>	<b>2030</b>	<b>2035</b>	<b>2040</b>	<b>2045</b>
Supply Totals (MG)	2,540	2,721	2,918	3,132	3,366
Demand Totals (MG)	2,540	2,721	2,918	3,132	3,366
Difference	0	0	0	0	0

Source: (QK 2024)

**Table 3.4.10-2: Single Dry Year Supply and Demand Comparison**

	<b>2025</b>	<b>2030</b>	<b>2035</b>	<b>2040</b>	<b>2045</b>
--	-------------	-------------	-------------	-------------	-------------

Supply	1,906	2,042	2,190	2,350	2,526
Totals (MG)					
Demand	1,906	2,042	2,190	2,350	2,526
Totals (mg)					
Difference	0	0	0	0	0

Source: City of Sanger 2020 UWMP

**Table 3.4.10-3: Multiple Dry Year Supply and Demand Comparison**

		2025	2030	2035	2040	2045
First Year	Supply	2,321	2,486	2,666	2,862	3,075
	Totals					
	Demand	2,321	2,486	2,666	2,862	3,075
	Totals					
	Difference	0	0	0	0	0
Second Year	Supply	2,237	2,397	2,570	2,759	2,964
	Totals					
	Demand	2,237	2,397	2,570	2,759	2,964
	Totals					
	Difference	0	0	0	0	0
Third Year	Supply	2,192	2,348	2,518	2,703	2,904
	Totals					
	Demand	2,192	2,348	2,518	2,703	2,904
	Totals					
	Difference	0	0	0	0	0
Fourth Year	Supply	2,146	2,299	2,465	2,646	2,844
	Totals					
	Demand	2,146	2,299	2,465	2,646	2,844
	Totals					
	Difference	0	0	0	0	0
Fifth Year	Supply	2,102	2,252	2,414	2,592	2,785
	Totals					
	Demand	2,102	2,252	2,414	2,592	2,785
	Totals					
	Difference	0	0	0	0	0

Source: City of Sanger 2020 UWMP

As depicted in Table 3.4.10-1 through Table 3.4.10 3, the anticipated groundwater supplies are sufficient to meet all demands through the year 2045 in the normal year, single dry-year, and multiple dry-year scenarios.

The long-term operational water demand will be for the residential users and is anticipated to be approximately 48.36 million gallons (MG)per year or 148.41 acre-feet per year for the

total build out of the Project. This is based on each residential lot having an average day water demand of 250 gallons per day across the entire buildout of 530 lots for the Project.

The Project is within the City SOI and growth within the SOI is what the UWMP considered in growth from 2025 to 2045. The Project water demand is included in the projected increase in water demand of 683 MG from 2025 to 2045 (Table 3.4.10-3). The Project long-term operational water demand is 0.7944% (118.917 MG/14,969 MG) of the available water supply in the city. The Project is accounted for in the UWMP and the UWMP is in agreement with SKGSA GSP.

The city updated the Water Master Plan and determined that the City does not have capacity to serve additional growth and proposed development projects until two new wells become operational. The two new wells (Well 19 and 22) are currently in various phases of construction. Well 22 is anticipated to be operational by 2025 and Well 19 is anticipated to be operational by the end of 2025. Since the tables from the UWMP in this report were contingent upon extra supply wells being operational, the water supply for this Project will not be available until both new wells are operational by Spring 2026 (Q3 2024).

It is anticipated that the City will have sufficient water to meet the Project's water demand with the completion of Well 19 and Well 22. Therefore, the Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin. A less than significant impact is anticipated as a result of the Project.

**MITIGATION MEASURE(S)**

No mitigation is required.

**LEVEL OF SIGNIFICANCE**

Impacts would be *less than significant*.

**Impact #3.4.10c(i) –Would the Project 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 result in substantial erosion or siltation on- or off-site?**

The disturbance of soils on-site during construction that could cause erosion is minimal but may result in temporary construction impacts. Impacts from construction and operation are discussed below.

As discussed in Impact #3.4.10a above, potential impacts on water quality arising from erosion and sedimentation are expected to be localized and temporary during construction. Construction-related erosion and sedimentation impacts as a result of soil disturbance would be less than significant after implementation of a SWPPP and BMPs required by the NPDES.

Existing drainage pattern of the site and area would be affected by Project development because of the increase in impervious surfaces at the site. The construction of the Project includes the development of stormwater drainage improvements and would be developed under City standards. The Project will comply with local regulations in order to minimize impacts during construction and post-construction of the Project. The Project will not alter a stream or river. With the implementation of the SWPPP, BMPs for erosion or siltation on- or off-site would be implemented and result in a less than significant.

**MITIGATION MEASURE(S)**

No mitigation is required.

**LEVEL OF SIGNIFICANCE**

Impacts would be *less than significant*.

**Impact #3.4.10c(ii) – Would the Project 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 substantially increase the rate of amount of surface runoff in a manner which would result flooding on- or off-site?**

See also Impact #3.4.10c(i) above.

Existing drainage patterns of the site would be affected by Project development because of the increase in impervious surfaces at the site. The addition of impervious surfaces can increase the potential for stormwater runoff and soil erosion. All Project components will comply with the City Municipal Code for urban storm water quality management.

The Project would not cause substantial surface runoff that would result in flooding on- or off-site. Therefore, with mitigation, the Project would have a less than significant impact.

**MITIGATION MEASURE(S)**

No mitigation is required.

**LEVEL OF SIGNIFICANCE**

Impacts would be *less than significant*.

**Impact #3.4.10c(iii) – Would the Project 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 create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?**

Please see Impacts #3.4.10a through c(ii) above.

The Project would not substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site, contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems, nor provide additional sources of polluted runoff. The Project also includes approximately 3.23 acres for a neighborhood park/open space, which would allow for stormwater to naturally percolate back into the groundwater system. Therefore, the Project would have a less than significant impact.

**MITIGATION MEASURE(S)**

No mitigation is required.

**LEVEL OF SIGNIFICANCE**

Impacts would be *less than significant*.

**Impact #3.4.10c(iv) – Would the Project 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 impede or redirect flood flows?**

Please see Impacts #3.4.10a through c(ii) above.

As discussed in Impacts #3.4.4b and #3.4.4c, there were no wetlands or waters features such as streams or drainages identified on the Project site. The Project is anticipated to be developed on relatively flat land and would not significantly alter existing drainage patterns or the course of a stream or river. The Project site is not located within a special flood hazard zone and would not impede or redirect flood flows. Therefore, the Project will have a less-than-significant impact.

**MITIGATION MEASURE(S)**

No mitigation is required.

**LEVEL OF SIGNIFICANCE**

Impacts would be *less than significant*.

**Impact #3.4.10d – Would the Project, in flood hazard, tsunami, or seiche zones, risk release of pollutants due to Project inundation?**

The Project site is not located near the ocean or a steep topographic feature (i.e., mountain, hill, bluff, etc.). Tsunamis are waves generated in oceans from seismic activity. Due to the inland location of the site, tsunamis are not considered a hazard for the site. Therefore, there is no potential for the site to be inundated by tsunami or mudflow.

A seiche is a wave generated by the periodic oscillation of a body of water whose period is a function of the resonant characteristics of the containing basin as controlled by its physical

dimensions. There is no body of water within the vicinity of the Project site. There is no potential for the inundation of the Project site by seiche.

As noted above, the Project site is not located in an identified special flood hazard zone as identified by FEMA. During construction, the Project as required by State and City Municipal Code requirements, will need approval of a SWPPP and resulting implementation of BMPs to reduce the risk of pollutant releases from construction activities. Once constructed, the Project As there is no flood hazard potential on the site, the risk of pollutant release is minimal. The FCMHMP identifies dams and levees throughout Fresno County and their potential hazard classification. Per the FCMHMP, the County remains at risk of damn failure due to the high number of dams in the County and history of past dam failures. It should be noted that there have not been any failures of major dams in the County (Fresno County 2024). The closest major dam is the Pine Flat Dam located approximately 16 miles east of the Project site. The Project and its future inhabitants are subject to the emergency evacuation procedures administered by the Fresno County Office of Emergency Services. Compliance with the requirements under the SWPPP and emergency procedures related to Project inundation during a dam failure will ensure that impacts would be less than significant.

**MITIGATION MEASURE(S)**

No mitigation is required.

**LEVEL OF SIGNIFICANCE**

Impacts would be *less than significant*.

**Impact #3.4.10e – Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?**

See Impacts #3.4.10a, #3.4.10b and #3.4.10c(i).

The Project will comply with all applicable local and State standards during construction and operation including preparation and approval of a SWPPP as per MM GEO-1. This Project is not anticipated to use or substantially deplete groundwater supplies or conflict with any adopted groundwater management plan. Therefore, this Project will have a less-than-significant impact.

**MITIGATION MEASURE(S)**

Implementation of MM GEO-1.

**LEVEL OF SIGNIFICANCE**

Impacts would be *less than significant mitigation incorporated*.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
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**3.4.11 - LAND USE AND PLANNING**

Would the Project:

- |    |   |                          |                          |                                     |                                     |
|----|---|--------------------------|--------------------------|-------------------------------------|-------------------------------------|
| a. | Physically divide an established community?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |

**Discussion**

**Impact #3.4.11a – Would the Project physically divide an established community?**

The Project is proposed on an approximately 80-acre Project site located in the western portion of the City SOI and constitutes the orderly expansion of the City as identified in the General Plan. The proposed Project site would not create a division between any established communities. The proposed Project would not physically divide an established community. Therefore, the Project will have no impact.

**MITIGATION MEASURE(S)**

No mitigation is required.

**LEVEL OF SIGNIFICANCE**

There would be *no impact*.

**Impact #3.4.11b – Would the Project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?**

The Project requests the approval of a CUP for a Planned Unit Development to allow reduced lot sizes, setbacks, lot coverage, which deviate from the development standards of the R-1-6 Zone District. The Project would therefore be consistent with City development standards as allowed by the approval of the CUP/PUD.

The Project also request approval of a General Plan Amendment to change approximately 14.27 acres of Park and Open Space to Medium Density Residential, leaving a remainder of

3.23 acres of Parks and Open Space within the Project area for a neighborhood park. The General Plan designated a number of future “floating” park locations in future residential growth areas. These designations are “floating” in that they may be adjusted and sized as needed depending on the nature and density of actual development.

As mentioned above, part of the Project includes an approximately 3.23-acre park which is proposed in the middle of the subdivision and keeps the intent of the Open Space designation even though the GPA will redesignate the site to Medium Density Residential. The City plans to update their Parks Master Plan to more efficiently and logically designate park and open space areas throughout the Planning Area. As noted, the Project will provide park space for its immediate residents while the City prepares for future updates and improvements for their Parks Master Plan. The following General Plan Goals, Objectives, and Action Plans have been identified that pertain to Medium Density Residential and Open Space.

## Chapter 2: Land Use Element

- **Issue Two Growth Management, Goal I, Objective II:** Ensure that Sanger’s future growth promotes a compact, contiguous and concentric urban form.
- **Issue Two Growth Management, Goal I, Objective III:** Promote Smart Growth planning principles in order to discourage urban sprawl and the premature urbanization of agricultural land, and to create more livable neighborhoods.
- **Issue Two Growth Management, Goal I, Objective III, Action Plan 2:** New urban development should occur on undeveloped properties which are closer to the existing built-up area or which are in-fill parcels.
- **Issue Three Residential Neighborhoods, Goal II, Objective II, Action Plan 3:** Continue to discourage land uses that are incompatible with residential neighborhoods.
- **Issue Three Residential Neighborhoods, Goal II, Objective IV:** Protect existing and future neighborhoods from incompatible land uses.

## Chapter 4: Conservation, Open Space, Parks and Recreation Element

- **Issue One Parks and Open Space, Goal I:** Develop a high quality public park and recreation system that is convenient, accessible and affordable to all segments of the City. Based on a ratio of 3 acres per 1,000 residents, the City should add approximately 30 acres of developed park land by the year 2035.
- **Issue One Parks and Open Space, Goal I, Objective 2:** Require developers to dedicate new parks within new subdivisions at a ratio of 3 acres per 1,000 residents. The actual amount of acreage could be less if the developer agrees to install landscape and play equipment improvements equal to the value of the difference in acreage. In lieu of land dedication, the developer shall pay the City’s park impact fee.

The proposed Project includes a residential subdivision with 530 single-family residential lots and an approximately 3.23-acre park. U.S. Census data indicates that the average household size of Sanger is 3.6, resulting in 1,908 residents (U.S. Census Bureau 2023). Therefore, in addition to the proposed park space, the Project proponent would be required to comply with Goal I, Objective 2 where additional improvements or payment of park impact fees would also be applicable to meet City requirements.

The proposed Project would assist the City in meeting its Regional Housing Needs Allocation (RHNA) of 573 for the 2023-2031 planning period (Fresno Council of Governments 2023). RHNA is based on countywide housing projections developed by the California Department of Housing and Community Development (HCD). HCD works with regional Council of Governments to determine the amount of housing needed within the region. As such, the proposed Project with compliance of applicable General Plan Goals, Objectives, and Action Plans, would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the Project. Therefore, the Project would have a less than significant impact.

***MITIGATION MEASURE(S)***

No mitigation is required.

***LEVEL OF SIGNIFICANCE***

Impacts would be *less than significant*.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
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**3.4.12 - MINERAL RESOURCES**

Would the Project:

- |  |                          |                          |                                     |                          |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?                                 | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

**Discussion**

**Impact #3.4.12a – Would the Project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?**

The California Department of Conservation, Geological Survey classifies lands into Aggregate and Mineral Resource Zones (MRZ) based on guidelines adopted by the California State Mining and Geology Board, as mandated by the Surface Mining and Reclamation Act of 1974. These MRZs identify whether known or inferred significant mineral resources are present in areas. Lead agencies are required to incorporate identified MRZs resource areas delineated by the State into their General Plans. The State has not identified any mineral resource zones within the Sanger planning area or area designated for future expansion of the City (Fresno County 2000).

The Project site is not located in an identified CalGEM oilfield, and there are no known wells located on the site (CalGEM 2024). The proposed Project would not result in the loss of availability of mineral resources as the Project does not propose the extraction of mineral resources.

The proposed Project would not 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. Therefore, Project impacts would be less than significant.

**MITIGATION MEASURE(S)**

No mitigation is required.

**LEVEL OF SIGNIFICANCE**

Impacts would be *less than significant*.

**Impact #3.4.12b – Would the Project 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?**

The proposed Project is not designated as a mineral recovery area and the Project would not alter any existing plans that protect mineral resources. As a result, the proposed Project would not interfere with known mining operations and would not result in the loss of land designated for mineral and petroleum.

The proposed Project would not 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. Therefore, impacts would be less than significant.

**MITIGATION MEASURE(S)**

No mitigation is required.

**LEVEL OF SIGNIFICANCE**

Impacts would be *less than significant*.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
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### 3.4.13 - NOISE

Would the Project result in:

a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established in a local general plan or noise ordinance or applicable standards of other agencies?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Generation of excessive ground-borne vibration or ground-borne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

### Discussion

The analyses in this section are based on an Acoustical Analysis (WJV Acoustics 2024) attached as Appendix F.

#### Impact #3.4.13a – Would the Project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established in a local general plan or noise ordinance or applicable standards of other agencies?

The Noise Element of the Sanger General Plan provides noise level criteria for land use compatibility for both transportation and non-transportation noise sources. The General Plan sets noise compatibility standards for transportation noise sources in terms of the Day-Night Average Level (Ldn). The Ldn represents the time-weighted energy average noise level for a 24-hour day, with a 10 dB penalty added to noise levels occurring during the nighttime hours (10:00 p.m.-7:00 a.m.). The Ldn represents cumulative exposure to noise over an extended period of time and are therefore calculated based upon annual average conditions. Table 3.4.13-1 provides the General Plan noise level standards for transportation noise sources.

**Table 3.4.13-1  
City of Sanger General Plan Noise Level Standards Transportation (Non-Aircraft) Noise Sources**

<b>Noise Sensitive Land Use</b>	<b>Outdoor Activity Areas Ldn/CNEL, dB</b>	<b>Interior Spaces Ldn/CNEL, dB</b>
Residential-Low Density Single Family	65	45
Multi-Family, Duplex, Mobile Homes	65	45
Transient Lodging-Motels, Hotels	65	45
Hospitals and Nursing Homes	65	45
Churches and Meeting Halls	-	45
Office Buildings, Schools, Libraries	-	45

Source: Appendix F

The General Plan Noise Element also provides noise level standards for stationary (non-transportation noise sources). Stationary noise standards are set in terms of the hourly energy average (Leq) and maximum (Lmax) noise level descriptors. The stationary noise standards become more restrictive during the nighttime hours from 10:00 p.m. to 7:00 a.m. The City of Sanger noise standards for stationary noise sources are provided below in Table 3.4.13-2.

**Table 3.4.13-2  
City of Sanger General Plan Noise Level Standards Stationary (Non-Transportation) Noise Sources**

<b>Daytime (7 a.m. – 10 p.m.)</b>		<b>Nighttime (10 p.m. – 7 a.m.)</b>	
<b>Leq</b>	<b>Lmax</b>	<b>Leq</b>	<b>Lmax</b>
55	75	50	65

Source: Appendix F

Construction-related noise levels and activities will be temporary and intermittent. The proposed Project will generate noise from construction equipment including, but not limited to the following equipment: tractor, loaded truck, forklifts, generator, crane, paver, roller, compactor, and an air compressor. Additionally, traffic and the various other noises generally associated with construction activities will be temporary and only take place during permitted hours pursuant to General Plan Action Plan I.2.a of the Noise Element (Page 6-11). In addition, the construction-related noise will be intermittent and cease once the proposed Project is completed. Therefore, construction-related noise levels are anticipated to have a less than significant impact in terms of temporary noise generation and does not significantly impact receptors in vicinity of the Project.

## Exterior Noise Level Compliance

The Project anticipates the majority of new noise resulting from traffic generation to and from the Project site. Noise exposure from traffic on E. Annandale Avenue and E. North Avenue was calculated for existing and future (2046) conditions using the FHWA Traffic Noise Model and traffic data obtained from Fresno COG. Noise level measurements and concurrent traffic counts were conducted to evaluate the accuracy of the FHWA Model in describing traffic noise exposure within the Project site. One traffic noise measurement site was located at a setback distance of approximately 25 feet from the centerline of each roadway. The posted speed limit was 45 mph (miles per hour) along East North Avenue and 40 mph along East Annandale Avenue. Noise measurements were conducted in terms of the equivalent energy sound level (Leq). Measured Leq values were compared to Leq values calculated (predicted) by the FHWA Model using as inputs the traffic volumes, truck mix and vehicle speed observed during the noise measurements. The results of the comparison are shown in Table 3.4.13-3. From Table 3.4.13-3 it may be determined that the traffic noise levels predicted by the FHWA Model were 1.6 dB lower than those measured for the conditions observed at the time of the noise measurements for East North Avenue and 0.9 dB lower than those measured for the conditions observed at the time of the noise measurements for East Annandale Avenue. Based on the predicted noise levels, Project operation is not anticipated to result in significant increases to ambient noise levels. Additionally, the Project would result in noise generation typical of a residential neighborhood. The noise associated with typical residential uses would be subject to compliance of the General Plan Noise Element and policies adopted to minimize excessive noise from environmental sources.

**Table 3.4.13-3  
Comparison of Measures and Predicted Noise Levels**

	<b>E. North Avenue</b>	<b>E. Annadale Avenue</b>
Measurements Start Time	3:45 P.M.	12:45 P.M.
Observed # Autos/Hr.	504	168
Observed # Medium Trucks/Hr.	60	0
Observed # Heavy Trucks/Hr.	12	0
Observed Speed (MPH)	45	40
Distance, ft. (from center of roadway)	25	25
Leq, dBA (Measured)	72.9	62.5
Leq, dBA (Predicted)	71.3	61.6
Difference between Predicted and Measured Leq, dBA	1.6	0.9

Notes: FHWA "soft" site assumed for calculations..

Source: Appendix F

Annual Average Daily Traffic (AADT) data for East North Avenue and East Annandale Avenue in the Project vicinity was obtained from Fresno COG. Truck percentages and the day/night distribution of traffic were estimated by WJVA, based upon previous studies conducted in the Project vicinity since Project-specific data were not available from government sources. A speed limit of 45 mph was assumed for E. North Avenue and a speed limit of 40 mph was assumed for E. Annandale Avenue. Table 3.4.13-4 summarizes the annual average traffic noise exposure, calculated for the closest proposed backyards from E. North Avenue and E. Annandale Avenue.

**Table 3.4.13-4**  
**Modeled Traffic Noise Levels (dB, Ldn)**

<b>Roadway</b>	<b>Existing Conditions</b>	<b>2046 Conditions</b>
E. North Avenue (west of Bethel Avenue)	59	59
E. Annadale Avenue (west of Bethel Avenue)	57	58

Source: Appendix F

The traffic noise exposure at the closest proposed lots to E. North Avenue would be approximately 59 dB Ldn for both existing and future (2046) traffic conditions on E. North Avenue. Traffic noise exposure for the closest lots to E. Annandale Avenue would be approximately 57 dB Ldn for existing conditions and approximately 58 dB Ldn for future (2046) traffic conditions. These noise exposure levels do not exceed the City's 65 dB Ldn exterior noise level standard, and mitigation measures are therefore not required for compliance with the City's exterior noise level standard.

### **Interior Noise Level Compliance**

The City interior noise level standard is 45 dB Ldn. The worst-case noise exposure within the proposed residential development would be approximately 59 dB Ldn (existing and 2046 conditions). This means that the proposed residential construction must be capable of providing a minimum outdoor-to-indoor noise level reduction (NLR) of approximately 14 dB ( $59-45=14$ ).

A specific analysis of interior noise levels was not performed. However, it may be assumed that residential construction methods complying with current building code requirements will reduce exterior noise levels by approximately 25 dB if windows and doors are closed. This will be sufficient for compliance with the City's 45 dB Ldn interior standard at all proposed lots. Requiring that it be possible for windows and doors to remain closed for sound insulation means that air conditioning or mechanical ventilation will be required. This Project design measure shall be incorporated as Mitigation Measure MM NSE-1 to ensure compliance with the City's 45 dB Ldn interior standards are met.

**MITIGATION MEASURE(S)**

**MM NSE-1:** Added as a note on TTM 6394, air conditioning or mechanical ventilation shall be installed in the units so that it will be possible for windows and doors to remain closed for sound insulation purposes to avoid exceeding City of Sanger interior noise thresholds.

**LEVEL OF SIGNIFICANCE**

Impacts would be *less than significant with mitigation incorporated*.

**Impact #3.4.13b – Would the Project result in generation of excessive ground-borne vibration or ground-borne noise levels?**

**Construction**

Construction activities, in general, can have the potential to create ground-borne noise that can manifest into ground-borne vibrations. It is unlikely that any blasting or pile-driving would be required in connection with the construction of the Project. Construction activities most likely to cause ground-borne vibration include heavy construction equipment. Therefore, the potential for ground-borne vibrations to occur as part of the construction of the Project is considered minimal.

The Federal Transit Administration (FTA) has published standard vibration velocities for construction equipment operations (U.S. Department of Transportation 2017). In general, the FTA architectural damage criterion for continuous vibrations (i.e., 0.2 inch/second) appears to be conservative even for sustained pile driving. Building damage can be cosmetic or structural. Ordinary buildings that are not particularly fragile would not experience any cosmetic damage (e.g., plaster cracks) at distances beyond 30 feet. This distance can vary substantially depending on the soil composition and underground geological layer between the vibration source and receiver. In addition, not all buildings respond similarly to vibration generated by construction equipment. The typical vibration produced by construction equipment is illustrated in Table 3.4.13-5.

**Table 3.4.13-5  
Typical Vibration Levels for Construction Equipment**

<b>Equipment</b>	<b>Reference peak particle velocity at 25 feet (inches/second)<sup>1</sup></b>	<b>Approximate peak particle velocity at 100 feet (inches/second)<sup>2</sup></b>
Loaded trucks	0.076	0.010
Vibratory compactor/roller	0.210	0.026

Notes:

1 – Federal Transit Administration, Transit Noise and Vibration Impact Assessment Guidelines, May 2006. Table 12-2.

2 – Calculated using the following formula:

$$PPV_{\text{equip}} = PPV_{\text{ref}} \times (25/D)^{1.5}$$

where: PPV (equip) = the peak particle velocity in inches/second of the equipment adjusted for the distance  
PPV (ref) = the reference vibration level in inches/second from Table 12-2 of the FTA Transit Noise and Vibration Impact Assessment Guidelines  
D = The distance from the equipment to the receiver

As indicated in Table 3.4.13-5, based on the FTA data, vibration velocities from typical heavy construction equipment that would be used during Project construction range from 0.076 to 0.210 inch-per-second peak particle velocity (PPV) at 25 feet from the source of activity. The closest sensitive receptors are existing adjacent single-family residences to the east of the Project site. With regard to the proposed Project, ground-borne vibration would be generated during site clearing and grading activities on-site facilitated by implementation of the proposed Project. It should be noted that 0.2 inch-per-second PPV is a conservative threshold, as that is the construction vibration damage criteria for non-engineered timber and masonry buildings. Buildings within the Project area would be better represented by the 0.5 inch-per-second PPV significance threshold (construction vibration damage criteria for reinforced concrete, steel, or timber buildings). Therefore, vibration impacts associated with construction are anticipated to be less than significant.

### **Operation**

Once constructed, the Project would not result in any activities that would create ground-borne vibrations. Thus, the proposed Project would not result in the exposure of persons to sensitive receptors or generate excessive ground-borne vibration or ground-borne noise levels. Therefore, the Project would have a less-than-significant impact.

### **MITIGATION MEASURE(S)**

No mitigation is required.

### **LEVEL OF SIGNIFICANCE**

Impacts would be *less than significant*.

**Impact #3.4.13c – 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?**

The Project site is located approximately 7.5 miles west of the Reedley Municipal Airport and approximately 8.2 miles southeast of the Fresno Yosemite International Airport. The Project site is located outside of the airport influence area, as identified in the Fresno County ALUCP (Fresno County Airport Land Use Commission 2018). Therefore, the Project is not within two miles of an airport and would not result in excessive noise for people residing or working in the Project area. As such, there would be no impact.

**MITIGATION MEASURE(S)**

No mitigation is required.

**LEVEL OF SIGNIFICANCE**

There would be *no impact*.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
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**3.4.14 - POPULATION AND HOUSING**

Would the Project

a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Discussion**

**Impact #3.4.14a – Would the Project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?**

As indicated in the General Plan, the Project site is designated for single-family residential development and is included in the SOI as land to be residentially developed. As previously noted, the Project would result in the development of new single-family residences and would provide additional housing opportunities for City residents and surrounding area. The proposed Project would encourage planned population growth within the City SOI, General Plan and the City’s RHNA. Therefore, although population growth would occur as a result of the Project, this growth is planned and encouraged, and therefore, would result in a less than significant impact.

**MITIGATION MEASURE(S)**

No mitigation is required.

**LEVEL OF SIGNIFICANCE**

Impacts would be *less than significant*.

**Impact #3.4.14b – Would the Project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?**

The Project site is located on a currently vacant site and does not propose the demolition or removal of existing people or housing. The Project sites will not displace existing people or housing, necessitating the construction of replacement housing elsewhere. Therefore, the Project would have no impact.

***MITIGATION MEASURE(S)***

No mitigation is required.

***LEVEL OF SIGNIFICANCE***

There would be *no impact*.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
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**3.4.15 - PUBLIC SERVICES**

Would the Project:

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

(i) Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(ii) Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(iii) Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(iv) Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(v) Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Discussion**

**Impact #3.4.15a(i) – Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or to other performance objectives for any of the public services - Fire Protection?**

Fire protection for the Project is provided by the City Fire Department. The City maintains one station strategically located at the Sanger Civic Center on Jensen Avenue and West Avenue, approximately one mile northeast of the Project site. The station is staffed by 35 full-time personnel including the Fire Chief, one Community Risk Reduction/Fire Prevention Officer, 25-line personnel, six single-role EMTs and paramedics and two administrative staff. The Department operates three Type 1 engines, one 104’ aerial ladder quint, three advanced life support ambulances and four support vehicles (City of Sanger 2020). Additionally, the City has automatic aid agreements with nearby fire agencies, including Fresno County Fire Protection District/Cal Fire, and the cities of Selma and Kingsburg for fire responses.

The General Plan has adopted policies and actions that require emergency access design standards, and an adequate water supply for fire suppression is available for new residential developments. Under Chapter 50, Article II of the City Ordinance Code, payment of development impact fees related to public safety facilities including fire protection services would be applicable to the Project. Additionally, development is expected to comply with the applicable CBC fire code and all applicable development regulations. The construction and operation of the proposed Project is not expected to increase the risk of fires on and adjacent to the Project site and is not expected to require the provision of new or altered fire protection facilities. Payment of development impact fees would be required under City Ordinance Code to address public improvements necessary to accommodate growth. Therefore, the impact would be less than significant.

**MITIGATION MEASURE(S)**

No mitigation is required.

**LEVEL OF SIGNIFICANCE**

Impacts would be *less than significant*.

**Impact #3.4.15a(ii) – Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or to other performance objectives for any of the public services – Police Protection?**

The City Police Department provides law enforcement services, including the Project site. The Police Department is headquartered at the Sanger Civic Center, located at the corner of Jensen and West Avenues. The Department is currently staffed with 43 personnel, including a chief, two commanders, one administration assistant, five sergeants, four corporals, 24 officers, one records supervisor, one records clerk, two community service officers and two animal control officer. These are augmented by a volunteer force (City of Sanger 2020)

The Project will increase the local population by developing a 530-lot single-family residential development. Under Chapter 50, Article II of the City Ordinance Code, payment of development impact fees related to public safety facilities including police protection services would be applicable to the project. The resulting impacts on police services related to acceptable service ratios, response times, or other performance objectives of police protection services are anticipated to be impacted. Payment of development impact fees would be applicable to the project and address police protection service to accommodate further growth within the City. The Project developer is expected to construct adequate infrastructure to service emergency access to the development Therefore with adequate design and payment of development impact fees, impacts to police protection would be less than significant.

**MITIGATION MEASURE(S)**

No mitigation is required.

**LEVEL OF SIGNIFICANCE**

Impacts would be *less than significant*.

**Impact #3.4.15a(iii) – Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or to other performance objectives for any of the public services – Schools?**

School services are provided by the Sanger Unified School District. The nearest school is Sanger High School located adjacent to the Project site.

The increased population generated by the proposed Project would increase the number of students attending local schools and could result in significant impacts to these facilities by requiring new facilities. Per the U.S. Census, the average household size is 3.6. Assuming a two parent household, the remaining 1.6 within the household would amount up to 848 students that would utilize school services within the City. The developer will be required to pay the appropriate school impact fees in order to receive building permits. According to Government Code Section 65996, the development fees authorized by SB 50 are deemed “full and complete school facilities mitigation.” School districts would utilize the General Plan and codes to establish new school sites and make decisions on school amenities and facility size. The development will be subject to school impact fees to mitigate any increased impacts on school facilities

**MITIGATION MEASURE(S)**

No mitigation is required.

**LEVEL OF SIGNIFICANCE**

Impacts would be *less than significant*.

**Impact #3.4.15a(iv) – Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or to other performance objectives for any of the public services – Parks?**

The City has a network of parks and recreation facilities, with a 2020 inventory of parkland within the City being 56 acres of developed parkland. The City has adopted a Parks and Recreation Master Plan to plan for new park space, and improvement/expansion of existing parks. The Parks and Recreation Master Plan identifies the needs for additional park space

for the population of Sanger in 2025, which will require up to 250 acres of Neighborhood Parks and 250 acres of Community Parks. The City utilizes a three acre per 1,000 population policy under Issue 1, Goal 1 of the Conservation, Open Space, Parks and Recreation Element of their General Plan (Page 4-13). The U.S. Census states that the total population in 2023 was estimated at 26,515. Therefore, based on the parkland inventory and population, the City currently is at a 2.2 acres per 1,000 population of park (City of Sanger 2020).

The U.S. Census estimates an average household size of 3.6 for the City of Sanger (U.S. Census Bureau 2024). Therefore, an estimated 1,908 increase in population size would occur as a result of the Project. As noted, the proposed Project includes the development of approximately 3.23 acres for neighborhood park and open space that will count towards the established parkland to population ratio identified in the General Plan. The amount of park space proposed does not completely offset the approximate population increase associated with the Project, and therefore, the developer would be required to pay all applicable impact fees related to parks and recreation. The inclusion of 3.23 acres of land for park space would offset the projected population, however this amount does not meet the targeted park acreage per 1,000 ratio. As noted, payment of park fees will help the City meet its park space goals as outlined in the General Plan and the Parks and Recreation Master Plan. Therefore, with the proposal for open space and payment of impact fees related to parks and recreation, the Project would have a less than significant impact.

**MITIGATION MEASURE(S)**

No mitigation is required.

**LEVEL OF SIGNIFICANCE**

Impacts would be *less than significant*.

**Impact #3.4.15a(v) – Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or to other performance objectives for any of the public services – Other Public Facilities?**

See Impact #3.4.15a(i) through (iv) above.

The closest library to the Project site is located approximately one mile northeast of the Project site. The nearest healthcare centers to the Project site are located 0.6 miles and 1.1 miles to the north and east, respectively. The nearest hospital is located in downtown Fresno, approximately 11 miles west of the Project site.

As noted in Impact #3.4.14a, the Project does not promote unplanned growth or development. As such, the development of the Project will minimally increase the demand for other public services, such as libraries and health services. However, the increase in

demand will not in and of itself require the construction of additional facilities. As such, impacts would be less than significant.

***MITIGATION MEASURE(S)***

No mitigation is required.

***LEVEL OF SIGNIFICANCE***

Impacts would be *less than significant*.

**3.4.16 - RECREATION**

Would the Project:

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
a. Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Discussion**

**Impact #3.4.16a – 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?**

See Impact #3.4.15a(iv).

As previously discussed, the City has adopted a 3.0 acres of parkland per 1,000 residents ratio under their General Plan. Under their 2020 General Plan inventory, the City is currently not meeting their parkland ratio. The inclusion of 3.23 acres of land for park space as part of the Project would offset the projected population, however this amount does not meet the targeted park acreage per 1,000 residents ratio. As noted, payment of park fees will help the City meet its park space goals as outlined in the General Plan and the Parks and Recreation Master Plan. Therefore, with the proposal for open space and payment of impact fees related to parks and recreation, the Project would have a less than significant impact.

**MITIGATION MEASURE(S)**

No mitigation is required.

**LEVEL OF SIGNIFICANCE**

Impacts would be *less than significant*.

**Impact #3.4.16b – Would the Project include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?**

See Impact #3.4.16a above.

**MITIGATION MEASURE(S)**

No mitigation is required.

**LEVEL OF SIGNIFICANCE**

Impacts would be *less than significant*.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
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**3.4.17 - TRANSPORTATION**

Would the Project:

a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Discussion**

The analyses in this section are based on a Traffic Study (Peters Engineering Group 2025) attached as Appendix G.

**Impact #3.4.17a – Would the Project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?**

**Transit**

The City provides an alternative mode of transportation within the City via a demand responsive transit service provided for the elderly and disabled passengers in the community from 7:00 AM to 5:30 PM, Monday through Friday.

Sanger is also one of several cities/communities that are served by Fresno County Rural Transit Agency. Services are generally Monday through Friday from 7:00 AM to 5:30 PM. Currently, there are 20 transit subsystems that are available to the elderly, disabled, low income, and general public within each of the 13 rural incorporated cities of Fresno County including Coalinga, Firebaugh, Fowler, Huron, Kerman, Kingsburg, Mendota, Orange Cove, Parlier, Reedley, Sanger, San Joaquin, and Selma (City of Sanger 2020).

### ***Bicycle/Pedestrian Facilities***

The City Transportation and Circulation Element identifies the roadways in vicinity of the Project site for future active transportation facilities:

- North Avenue, west of Bethel Avenue (Class II, Striped Bike Lane)
- Indianola Avenue, north of North Avenue (Class I, Multi-Use Path)
- Bethel Avenue, north of North Avenue (Class II, Striped Bike Lane)
- Bethel Avenue, south of North Avenue (Class II, Buffered Bike Lane)

According to the bikeway design criteria established by Caltrans (California Department of Transportation 2025), these bikeway classifications are defined as follows:

- Class I Bikeways (Bike Paths): Class I bikeways (bike paths) are facilities with exclusive right of way, with cross flows by vehicles minimized. Motor vehicles are prohibited from bike paths, which can be reinforced by signing.
- Class II Bikeways (Bike Lanes): Class III Bikeways (Bike Route) are shared routes and do not require pavement markings. In some instances, a 4-inch white edge stripe separating the traffic lanes from the shoulder can be helpful in providing for safer shared use.
- Class III Bikeways (Bike Lanes): Class III bikeways (bike routes) are intended to provide continuity to the bikeway system. Bike routes are established along through routes not served by Class I, II, or IV bikeways, or to connect discontinuous segments of bikeways (normally bike lanes). Class III facilities are facilities shared with motor vehicles or pedestrians, which are designated by signs or permanent markings.

### ***Roadways***

The State of California does not recognize traffic congestion and delay as an environmental impact per CEQA. However, the City General Plan Circulation Element has designated level of services (LOS) "C" as the minimum acceptable LOS standard on city facilities. A peak-hour of LOS "C" is taken as the threshold for acceptable traffic operations at all study intersections. Goal/Objective/Action Plan II.2 of the General Plan (Page 3.53) states the City has established a target LOS "C" along all major streets and highways except that LOS "D" may be allowed at intersections of any major street, highway or along street and highway segments where additional improvements are not feasible, as determined by City engineer. The *Transportation Research Board Highway Capacity Manual, 7th Edition*, (HCM) defines level of service (LOS) as, "a quantitative stratification of a performance measure or measures representing quality of service. The measures used to determine LOS for transportation system elements are called service measures. The HCM defines six levels of service, ranging from A to F, for each service measure or combination of service measures. LOS A represents the best operating conditions from the traveler's perspective and LOS F the worst."

Automobile mode LOS characteristics for both unsignalized and signalized intersections are presented in Table 3.4.17-1 and 3.4.17-2 below.

**Table 3.4.17-1**  
**Level of Service Characteristics for Unsignalized Intersections**

Level of Service	Average Vehicle Delay (seconds)
A	0-10
B	>10-15
C	>15-25
D	>25-35
E	>35-50
F	>50

Source: Appendix G

**Table 3.4.17-2**  
**Level of Service Characteristics for Signalized Intersections**

Level of Service	Description	Average Vehicle Delay (seconds)
A	Volume-to-capacity ratio is no greater than 1.0. Progression is exceptionally favorable or the cycle length is very short.	<10
B	Volume-to-capacity ratio is no greater than 1.0. Progression is highly favorable or the cycle length is very short.	>10-20
C	Volume-to-capacity ratio is no greater than 1.0. Progression is favorable or cycle length is moderate.	>20-35
D	Volume-to-capacity ratio is high but no greater than 1.0. Progression is ineffective or cycle length is long. Many vehicles stop and individual cycle failures are noticeable.	>35-55
E	Volume-to-capacity ratio is high but no greater than 1.0. Progression is unfavorable and cycle length is long. Individual cycle failures are frequent.	>55-80
F	Volume-to-capacity ratio is greater than 1.0. Progression is very poor and cycle length is long. Most cycles fail to clear the queue.	>80

Source: Appendix G

Existing peak-hour traffic volumes at the study intersections were determined by performing manual turning-movement counts between 7:00 and 9:00 a.m. and between 4:00 and 6:00 p.m. on a day when schools were in session. Data provided in the Institute of Transportation Engineers (ITE) Trip Generation Manual, 11th Edition, are typically used to estimate the number of trips anticipated to be generated by proposed projects. Table 3.4.17-3 presents the vehicle trip generation estimates for the Project.

**Table 3.4.17-3  
Project Trip Generation Estimate**

Land Use	Units	Daily			A.M. Peak Hour				P.M. Peak Hour				
		Rate	Total	Rate	In:Out	In	Out	Total	Rate	In:Out	In	Out	Total
Single Family Detached Housing (210)	269	9.43	2,537	0.70	26:74	49	140	189	0.94	63:37	159	94	253
Single Family Detached Housing (210)	261	9.43	2,462	0.70	26:74	48	135	183	0.94	63:37	155	91	246
<b>Totals</b>	-	-	4,999	-	-	97	275	372	-	-	314	185	499

Source: Appendix G

The traffic analyses for the near-term and long-term conditions consider the effects of traffic expected to be generated by pending and approved projects in the study area. The following projects were considered in the analyses:

- Somerset: 503 single-family residences generally located south of North Avenue, east of Bethel Avenue, west of Greenwood Avenue, and north of the Muscat Avenue alignment
- Greenwood Estates: 143 single-family residences located southwest of the intersection of North Avenue and Greenwood Avenue
- Cherry Crossing: 136 multifamily units in two-story and three-story buildings northeast of the intersection of Cherry Avenue and Sanger Avenue
- Newmark Villages I & II: 114 multifamily units in three-story buildings northwest of the intersection of Tucker Avenue and Edgar Avenue

Based on the estimated trip generation of the Project and pending/approved projects noted above, peak hour LOS at the study intersections were determined and are provided in Tables 3.4.17-4 through 7 below.

**Table 3.4.17-4  
LOS Summary – Existing Conditions**

Intersection	Control	A.M. Peak Hour		P.M. Peak Hour	
		Delay (sec)	LOS	Delay (sec)	LOS
Jensen/McCall	Signals	27.9	C	22.2	C
Jensen/Bethel	Signals	28.9	C	26.0	C
9 <sup>th</sup> /Bethel	Signals	36.6	D	16.9	B
Annadale/McCall	One-way Stop	13.7	B	12.4	B
Annadale/Del Rey	All-way Stop	12.6	B	8.2	A
Annadale/Indianola	One-way Stop	20.1	C	11.3	B
Annadale/Bethel	Signals	35.4	D	13.6	B
North/McCall	All-way Stop	20.5	C	26.9	D
North/Del Rey	All-way Stop	11.1	B	10.9	B
North/Indianola	One-way Stop	13.3	B	16.1	C
North/Bethel	All-way Stop	23.8	C	17.9	C
North/Greenwood	Two-way Stop	21.1	C	16.1	C
Central/McCall	All-way Stop	12.8	B	12.0	B
Central/Bethel	All-way Stop	10.9	B	10.9	B
Central/Academy	All-way Stop	14.7	B	14.1	B

Source: Appendix G

**Table 3.4.17-5**  
**LOS Summary – Existing plus Project Conditions**

Intersection	Control	A.M. Peak Hour		P.M. Peak Hour	
		Delay (sec)	LOS	Delay (sec)	LOS
Jensen/McCall	Signals	27.9	C	22.2	C
Jensen/Bethel	Signals	28.9	C	26.0	C
9 <sup>th</sup> /Bethel	Signals	36.6	D	16.9	B
Annadale/McCall	One-way Stop	13.7	B	12.4	B
Annadale/Del Rey	All-way Stop	12.6	B	8.2	A
Annadale/Indianola	One-way Stop	20.1	C	11.3	B
Annadale/Bethel	Signals	35.4	D	13.6	B

North/McCall	All-way Stop	20.5	C	26.9	D
North/Del Rey	All-way Stop	11.1	B	10.9	B
North/Indianola	One-way Stop	13.3	B	16.1	C
North/Bethel	All-way Stop	23.8	C	17.9	C
North/Greenwood	Two-way Stop	21.1	C	16.1	C
Central/McCall	All-way Stop	12.8	B	12.0	B
Central/Bethel	All-way Stop	10.9	B	10.9	B
Central/Academy	All-way Stop	14.7	B	14.1	B

Source: Appendix G

**Table 3.4.17-6  
LOS Summary – Near Term with Project Conditions**

Intersection	Control	A.M. Peak Hour		P.M. Peak Hour	
		Delay (sec)	LOS	Delay (sec)	LOS
Jensen/McCall	Signals	34.8	C	24.8	C
Jensen/Bethel	Signals	29.3	C	26.1	C
9 <sup>th</sup> /Bethel	Signals	37.6	D	17.0	B
Annadale/McCall	One-way Stop	16.0	C	13.4	B
Annadale/Del Rey	All-way Stop	12.6	B	8.2	A
Annadale/Indianola	One-way Stop	18.8	C	10.9	B
Annadale/Bethel	Signals	37.2	D	13.7	B
North/McCall	All-way Stop	54.4	F	102.8	F
North/Del Rey	All-way Stop	17.4	C	17.6	C
North/Indianola	One-way Stop	16.6	C	18.7	C
North/Bethel	All-way Stop	81.5	F	70.4	F
North/Greenwood	Two-way Stop	27.0	D	19.6	C
Central/McCall	All-way Stop	13.3	B	12.4	B

Central/Bethel	All-way Stop	11.6	B	11.8	B
Central/Academy	All-way Stop	15.4	C	14.7	B

Source: Appendix G

**Table 3.4.17-7**  
**LOS Summary – Cumulative 2045 with Project Conditions**

Intersection	Control	A.M. Peak Hour		P.M. Peak Hour	
		Delay (sec)	LOS	Delay (sec)	LOS
Jensen/McCall	Signals	66.8	E	50.6	D
Jensen/Bethel	Signals	39.0	D	32.6	C
9 <sup>th</sup> /Bethel	Signals	48.7	D	19.2	B
Annadale/McCall	One-way Stop	32.6	D	24.6	C
Annadale/Del Rey	All-way Stop	12.5	B	8.9	A
Annadale/Indianola	One-way Stop	26.1	D	15.5	C
Annadale/Bethel	Signals	56.2	E	14.7	B
North/McCall	All-way Stop	115.4	F	202.4	F
North/Del Rey	All-way Stop	21.4	C	23.0	C
North/Indianola	One-way Stop	28.8	D	46.9	E
North/Bethel	All-way Stop	162.1	F	125.5	F
North/Greenwood	Two-way Stop	41.3	E	25.7	D
Central/McCall	All-way Stop	42.9	E	54.5	F
Central/Bethel	All-way Stop	74.5	F	94.1	F
Central/Academy	All-way Stop	51.4	F	43.8	E

Source: Appendix G

The results of the intersection analyses indicate that all of the study intersections are currently operating at acceptable LOS during the peak hours. Although the intersection of 9<sup>th</sup> Street and Bethel Avenue is operating at LOS D during the a.m. peak hour, the intersection is signalized and built out, so additional improvements are not feasible.

### Existing Plus Project Conditions

With the construction of Phases 1 and 2 of the Project, the study intersections are expected to continue to operate at acceptable LOS, with the exception that the intersection of North and McCall Avenues is expected to operate at LOS D with a side street delay of 26.9 seconds per vehicle during the p.m. peak hour. Potential improvements are as follows to address the LOS D at the intersection of 9<sup>th</sup> Street and Bethel Avenue:

- North Avenue/McCall Avenue: Construction of a dedicated left-turn lane on the southbound approach while maintaining the existing all-way stop control would result in LOS C during the A.M. and P.M. peak hours.
- Jensen Avenue/McCall Avenue: To accommodate the additional queue in the left-turn lane on the northbound approach, McCall Avenue would require widening to allow extending the length of the left-turn lane to approximately 275 feet.

### **Near Term with Project Conditions**

With construction of Phases 1 and 2 of the Project, the study intersections are expected to continue to operate at acceptable LOS, with the following exceptions:

- North Avenue / McCall Avenue: The cumulative near-term projects will cause LOS F during the a.m. and p.m. peak hours. A review of the traffic volumes suggests that peak-hour traffic signal warrants are satisfied during both the a.m. and p.m. peak hours.
- North Avenue / Bethel Avenue: The cumulative near-term projects will cause LOS F during the a.m. and p.m. peak hours. A review of the traffic volumes suggests that peak-hour traffic signal warrants are satisfied during both the a.m. and p.m. peak hours.
- North Avenue / Greenwood Avenue: The cumulative near-term projects will cause LOS D during the a.m. peak hour. A review of the traffic volumes suggests that peak-hour traffic signal warrants will not be satisfied in the near-term scenario.

Potential improvements to address the LOS deficiencies as identified above:

- North Avenue / McCall Avenue: With the addition of cumulative near-term trips, peak-hour traffic signal warrants are expected to be satisfied and the intersection would require signalization to operate at acceptable LOS. In the near-term-with-Project conditions, eight-phase signal operation with protected left-turn phasing is recommended with the following minimum lane configurations:
  - Eastbound: one left-turn lane and one through lane with a shared right turn
  - Westbound: one left-turn lane, one through lane, and one right-turn lane
  - Northbound: one left-turn lane, one through lane, and one right-turn lane

- Southbound: one left-turn lane and one through lane with a shared right turn
- North Avenue / Bethel Avenue: With the addition of cumulative near-term trips, peak-hour traffic signal warrants are expected to be satisfied, and the intersection will require signalization to operate at acceptable LOS. In the near-term-with-Project conditions, eight-phase signal operation with protected left-turn phasing is recommended with the following minimum lane configurations:
  - Eastbound: one left-turn lane, one through lane, and one right-turn lane
  - Westbound: one left-turn lane, one through lane, and one right-turn lane
  - Northbound: one left-turn lane, one through lane, and one right-turn lane
  - Southbound: one left-turn lane, one through lane, and one right-turn lane
- North Avenue / Greenwood Avenue: Peak-hour warrants for signalization are not expected to be satisfied in the near-term condition. Installation of all-way stop control is expected to result in an acceptable peak-hour LOS.
- Jensen Avenue / McCall Avenue: To accommodate the additional queue in the left-turn lane on the northbound approach, McCall Avenue would require widening to allow extending the length of the left-turn lane to approximately 375 feet.
- 9th Street / Bethel Avenue: The left-turn lane on the westbound approach would require lengthening to accommodate the calculated 95th-percentile queues. It is likely that the westbound approach could be restriped to accommodate a longer left-turn lane.

Implementation of the above would allow the intersections of North/McCall, North/Bethel, and North/Greenwood to operate at LOS C or better.

### **Cumulative 2045 with Project Conditions**

The year 2045 With-Project conditions analyses are based on the assumption that that the Project site has been developed and regional growth has occurred over a 20-year period. The analyses indicate that following intersections are expected to continue to operate at acceptable levels of service.

- Jensen Avenue / Bethel Avenue
- 9th Street / Bethel Avenue
- Annadale Avenue / Del Rey Avenue
- North Avenue / Del Rey Avenue

The following study intersections are expected to operate below the target LOS:

- Jensen Avenue / McCall Avenue: The intersection is expected to operate at LOS E during the a.m. peak hour. The calculated 95th-percentile queues exceed the storage capacity by a substantial amount in the left-turn lanes on the northbound and southbound approaches.
- Annadale Avenue / McCall Avenue: The westbound approach to the intersection is expected to operate at LOS D during the a.m. peak hour.
- Annadale Avenue / Indianola Avenue: The northbound approach to the intersection is expected to operate at LOS D during the a.m. peak hour.
- Annadale Avenue / Bethel Avenue: The intersection is expected to operate at LOS E during the a.m. peak hour. The calculated 95th-percentile queues exceed the storage capacity by a substantial amount in the left-turn lanes on the eastbound and northbound approaches during the a.m. peak hour. School traffic is considered to be the primary reason for the excessive delays and queues.
- North Avenue / McCall Avenue: The intersection is expected to operate at LOS F during the a.m. and p.m. peak hours.
- North Avenue / Indianola Avenue: The southbound approach to the intersection is expected to operate at LOS D during the a.m. peak hour and LOS E during the p.m. peak hour. In addition, the northbound approach to the intersection is expected to operate at LOS D during the p.m. peak hour.
- North Avenue / Bethel Avenue: The intersection is expected to operate at LOS F during the a.m. and p.m. peak hours, with the calculated 95th-percentile queue exceeding 1,000 feet in the westbound direction during the a.m. peak hour.
- North Avenue / Greenwood Avenue: The intersection is expected to operate at LOS E during the a.m. peak hour and LOS D during the p.m. peak hour.
- Central Avenue / McCall Avenue: The intersection is expected to operate at LOS E during the a.m. peak hour and LOS F during the p.m. peak hour.
- Central Avenue / Bethel Avenue: The intersection is expected to operate at LOS F during the a.m. and p.m. peak hours.
- Central Avenue / Academy Avenue: The intersection is expected to operate at LOS F during the a.m. peak hour and LOS E during the p.m. peak hour.

Potential improvements to address the LOS deficiencies as identified above:

- Jensen Avenue / McCall Avenue: The intersection is expected to require widening (while maintaining eight-phase traffic signal phasing) to the following lane configurations:
  - Eastbound: one left-turn lane, two through lanes, and one right-turn lane
  - Westbound: one left-turn lane, two through lanes, and one right-turn lane
  - Northbound: two left-turn lanes, one through lane, and one right-turn lane
  - Southbound: two left-turn lanes, one through lane, and one right-turn lane
- Jensen Avenue / Bethel Avenue: The left-turn lanes on the westbound and northbound approaches would require lengthening to accommodate the calculated 95th-percentile queues. It is likely that the westbound approach could be restriped to accommodate a longer left-turn lane. To lengthen the left-turn lane on the northbound approach, the median on Bethel Avenue would require modification and a left-turn lane approximately 300 feet south of the intersection (from southbound Bethel Avenue) would be relocated farther south.
- 9th Street / Bethel Avenue: The left-turn lanes on the westbound and southbound approaches would require lengthening to accommodate the calculated 95th-percentile queues. It is likely that the westbound approach could be restriped to accommodate a longer left-turn lane. To lengthen the left-turn lane on the southbound approach, the median on Bethel Avenue would require modification.
- Annadale Avenue / McCall Avenue: Construction of a dedicated right-turn lane would reduce the total delay on the westbound approach to the intersection.
- Annadale Avenue / Indianola Avenue: Installation of all-way stop control with the existing lane configurations is expected to result in acceptable levels of service.
- Annadale Avenue / Bethel Avenue: Considering that delays during the a.m. peak hour are associated with school traffic, the LOS at the intersection during the p.m. peak hour is B, and the intersection is generally constrained by existing development with no feasible widening, it is suggested that no improvements should be anticipated.
- North Avenue / McCall Avenue: The intersection is expected to require signalization and widening to the following lane configurations:
  - Eastbound: one left-turn lane and one through lane with a shared right turn
  - Westbound: one left-turn lane, one through lane, and one right-turn lane
  - Northbound: one left-turn lane, one through lane, and one right-turn lane
  - Southbound: one left-turn lane and one through lane with a shared right turn

- North Avenue / Indianola Avenue: In order to operate at acceptable LOS, all-way stop control should be installed and the intersection should be widened to provide a dedicated left turn lane on the eastbound approach and a dedicated right-turn lane on the southbound approach.
- North Avenue / Bethel Avenue: The intersection is expected to require signalization and widening to the following lane configurations:
  - Eastbound: one left-turn lane, one through lane, and one right-turn lane
  - Westbound: one left-turn lane, one through lane, and one right-turn lane
  - Northbound: one left-turn lane, one through lane, and one right-turn lane
  - Southbound: one left-turn lane, one through lane, and one right-turn lane
- North Avenue / Greenwood Avenue: The intersection is expected to require signalization. The existing lane configurations may be maintained with permissive left turns on the northbound and southbound approaches.
- Central Avenue / McCall Avenue: The intersection is expected to require signalization and widening to the following lane configurations:
  - Eastbound: one left-turn lane and one through lane with a shared right turn
  - Westbound: one left-turn lane, one through lane, and one right-turn lane
  - Northbound: one left-turn lane and one through lane with a shared right turn
  - Southbound: one left-turn lane and one through lane with a shared right turn
- Central Avenue / Bethel Avenue: The intersection is expected to require signalization and widening to the following lane configurations:
  - Eastbound: one left-turn lane and one through lane with a shared right turn
  - Westbound: one left-turn lane, one through lane, and one right-turn lane
  - Northbound: one left-turn lane and one through lane with a shared right turn
  - Southbound: one left-turn lane and one through lane with a shared right turn
- Central Avenue / Academy Avenue: The intersection is expected to require signalization and widening to the following lane configurations:
  - Eastbound: one left-turn lane, one through lane, and one right-turn lane
  - Westbound: one left-turn lane and one through lane with a shared right turn

- Northbound: one left-turn lane and two through lanes with a shared right turn
- Southbound: one left-turn lane and two through lanes with a shared right turn

Table 3.4.17-8 summarizes the anticipated LOS at the studied intersections with implementation of the improvements listed above.

**Table 3.4.17-8**  
**LOS Summary – Improved Cumulative 2045 with Project Conditions**

Intersection	Control	A.M. Peak Hour		P.M. Peak Hour	
		Delay (sec)	LOS	Delay (sec)	LOS
Jensen / McCall	Signals	27.8	C	22.0	C
Annadale / McCall	Two-way Stop	12.0	C	19.7	C
Annadale / Indianola	All-way Stop	15.6	C	10.9	B
North / McCall	Signals	18.0	B	24.1	C
North / Indianola	All-way Stop	23.2	C	19.9	C
North / Bethel	Signals	21.4	C	19.4	B
North / Greenwood	Signals	11.2	B	10.6	B
Central / McCall	Signals	15.7	B	17.9	B
Central / Bethel	Signals	17.8	B	19.0	B
Central / Academy	Signals	17.6	B	17.8	B

Source: Appendix G

Where required future improvements are not included in adopted development fees and are not the sole responsibility of a particular project, but rather a cumulative result of regional growth, the responsibility for the improvement may be determined based on equitable share calculations as presented in the Caltrans Guide for the Preparation of Traffic Impact Studies dated December 2002. The calculated equitable share responsibility is provided in Table 3.4.17-9 below.

**Table 3.4.17-9**  
**Equitable Share Responsibility Calculations**

Location	Governing Peak Hour	Project Trips	Estimated Traffic	Future Traffic	Equitable Share
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Jensen / McCall	A.M.	184	2,132	3,093	19.1%
Jensen / Bethel	A.M.	30	2,526	3,233	4.2%
9 <sup>th</sup> / Bethel	A.M.	41	2,098	2,632	7.7%
Annadale / McCall	A.M.	173	817	1,379	30.8%
Annadale / Indianola	A.M.	120	478	884	29.6%
North / McCall	P.M.	215	988	1,749	28.3%
North / Indianola	P.M.	302	367	1,143	38.9%
North / Bethel	A.M.	61	1,083	1,710	9.7%
North / Greenwood	A.M.	23	786	1,083	7.7%
Central / McCall	P.M.	35	768	1,331	6.2%
Central / Bethel	P.M.	45	743	1,519	5.8%
Central / Academy	A.M.	31	1,219	1,930	4.4%

Source: Appendix G

Therefore, based on the above analysis, to ensure that Project development does not significantly impact LOS at impacted intersections within the City of Sanger, the Project proponent will be required to pay their fair share for improvements to the studied intersection. Payment of fair share costs for intersection improvements will be implemented as conditions of approval for the Project.

Construction-related traffic is anticipated to be short-term and would not significantly impact existing or planned circulation infrastructure. The proposed operation of the Project would result in LOS impacts to certain intersections within the City. To address LOS deficiencies resulting from Project development, the recommended improvements and payment of fair share costs will be implemented as conditions of approval, so that payment of fair share costs for intersection improvements be paid to the City to ensure that intersections can accommodate the Project and future development. The proposed Project will not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities with compliance of the anticipated condition of approvals for fair share cost payments for intersection improvements. The Project will have a less than significant impact.

**MITIGATION MEASURE(S)**

**NO MITIGATION IS REQUIRED. LEVEL OF SIGNIFICANCE**

Impacts would be *less than significant*.

**Impact #3.4.17b – Would the Project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?**

CEQA Guidelines Section 15064.3, subdivision (b) includes criteria for determining the significance of transportation impacts are primarily focused on projects within transit priority areas and shift the focus from driver delay to a reduction of greenhouse gas emissions, creation of multimodal networks, and promotion of a mix of land uses. Vehicle Miles Traveled, or VMT, is a measure of the total number of miles driven to or from a development and is sometimes expressed as an average per trip or per person.

To date, the City has not yet formally adopted transportation significance thresholds or transportation impact analysis procedures for VMT. Since the regulations of SB 743 have not been finalized or adopted by the City, traffic delay remains the main measure used to determine the significance of traffic impact. However, the Fresno COG adopted the *Fresno County SB 743 Implementation Technical Report* (Technical Report) and provides guidance and tools for local agencies to consider when analyzing VMT impacts. Fresno COG has framed their technical report based on the California Office of Planning and Research suggested efficiency metrics of VMT per capita and VMT per employee in the evaluation of land use projects. Additionally, the Technical Report also provides generally accepted screening thresholds. Screening thresholds are based on traffic analysis zones (TAZ) maps or daily trips.

The OPR TA has established a threshold of 15 percent below the existing VMT per capita for residential projects. CARB establishes greenhouse gas (GHG) emissions targets for each of the 18 Metropolitan Planning Organizations (MPO) in the State, reviews the SCS and makes a determination whether the SCSs would achieve GHG reduction targets if implemented. Fresno COG's 2018 RT/SCS demonstrated a GHG reduction of 10 percent by 2035 through the integrated land use, transportation initiatives, and capital project listing, which meets CARB targets. CARB established a 13 percent GHG reduction target for 2035 for the Fresno region's third RTP/SCS. The State recognizes that Fresno County's contribution to the aggregate 15 percent Statewide GHG emission reduction is 13 percent. Hence, for Fresno COG VMT Analysis Guidelines, the option for a threshold of 13 percent has been determined for residential projects in Fresno COG member jurisdictions. The thresholds were used to identify and categorize the TAZs into a low, medium, or high VMT profiles.

In order to characterize the effect of changes in Project-related average daily trips (ADT) to the resulting GHG emissions, the California Emissions Estimator Model (CalEEMod) was used. This model was selected because it is provided by CARB to be used statewide for developing project-level GHG emissions analyses. CalEEMod was used with the built-in default trip lengths and types to show the vehicular GHG emissions from incremental

amounts of ADT. A common GHG emissions threshold is 3,000 metric tons of carbon dioxide equivalent<sup>4</sup> per year (MT CO<sub>2</sub>e/yr). The vehicle emissions are typically more than 50 percent of the total Project GHG emissions. Thus, a project with 500 ADT would generally have total emissions that would be less than 1,300 MT CO<sub>2</sub>e/yr. As this level of GHG emissions would be less than 3,000 MT CO<sub>2</sub>e/yr, the emissions of GHG from a project up to 500 ADT would typically be less than significant.

Based on the above screening thresholds, the map-based screening threshold was determined to be applicable to the Project. The COG travel model is the primary tool in Fresno County available to estimate VMT. COG created an online VMT screening application that identifies VMT per capita for specific locations. The screening application (Figure 3.4.17-1) indicates that the Project site is in an area that generates low VMT per capita (less than the threshold of 13 percent below the Countywide VMT per capita average of 16.10).

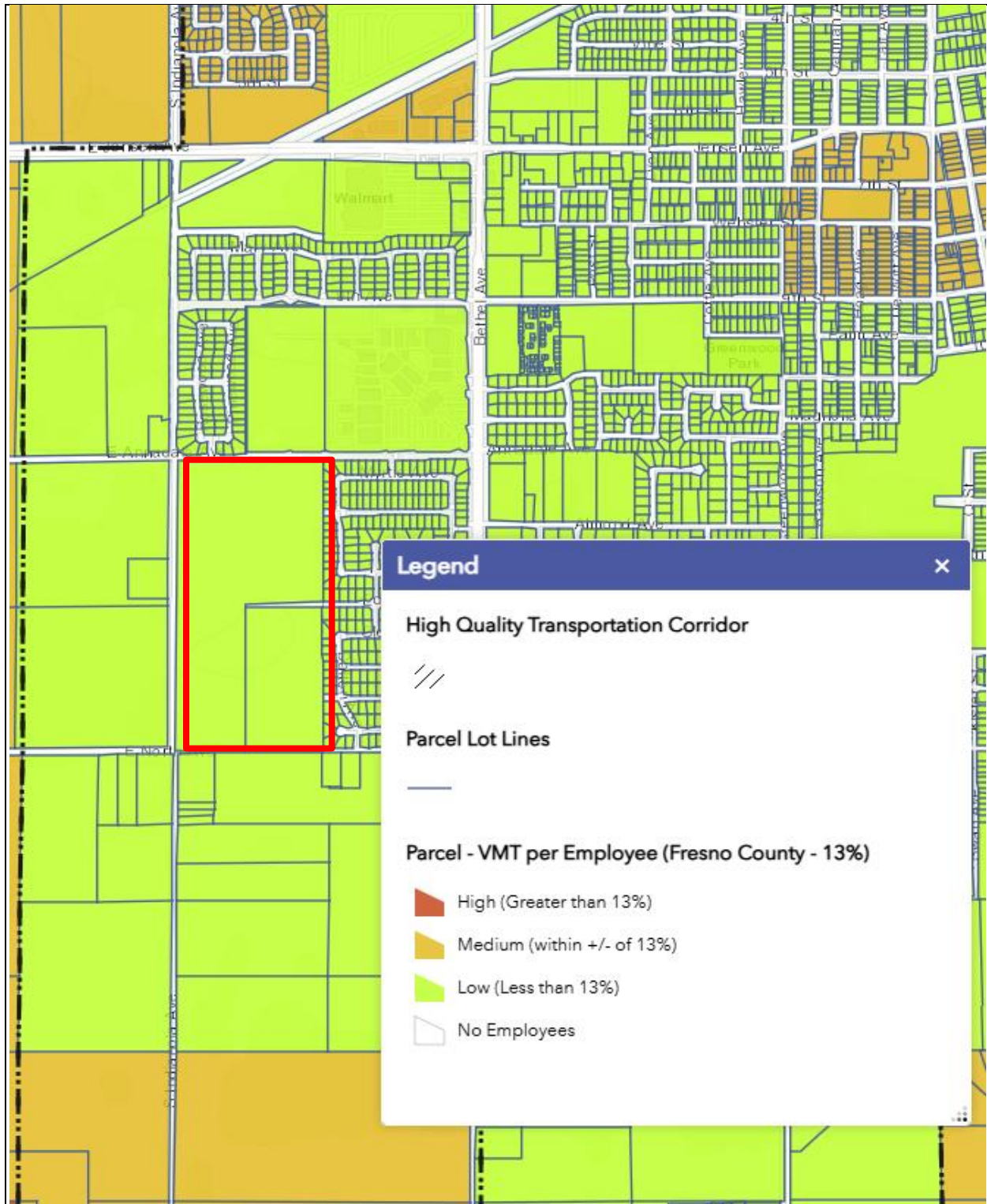


Figure 3.4.17-2  
Project Area - TAZ

Therefore, the Project may be “screened out” and it is presumed that the Project’s transportation impact will be less than significant. Therefore, impacts related to CEQA Guidelines Section 15064.3, subdivision (b) would be less than significant.

**MITIGATION MEASURE(S)**

No mitigation is required.

**LEVEL OF SIGNIFICANCE**

Impacts would be *less than significant*.

**Impact #3.4.17c – Would the Project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?**

**Construction**

The proposed Project may be required to obtain a traffic control permit and implement a traffic control plan (TCP) for construction occurring on City road right-of-way, such as the construction of new access points from Edgar Avenue to the proposed Project site. If required, the TCP would demonstrate appropriate traffic handling during construction activities that could impact the traveling public (e.g., the transport of equipment and materials to the Project area); thus, any increased hazards related to traffic and transportation during construction would be minimized. In accordance with existing requirements, the proposed Project would be subject to review by City and County staff to ensure safety standards are met during construction activities. Therefore, the impact related to transportation hazards during construction would be less than significant.

**Operation**

The Project will not include any geometric design features or incompatible uses that would substantially increase hazards. All road improvements would be constructed according to local road standards. Additionally, the proposed Project would be subject to review by City staff, which would ensure the Project design would comply with all applicable industry roadway design standards. Therefore, the proposed Project would not substantially increase hazards due to a design feature or incompatible uses, and the impact would be less than significant. ct.

**MITIGATION MEASURE(S)**

No mitigation is required.

**LEVEL OF SIGNIFICANCE**

Impacts would be *less than significant*.

**Impact #3.4.17d – Would the Project result in inadequate emergency access?**

The proposed Project would be required to comply with all emergency access requirements adopted and set forth in the City Municipal Code. Project site development will be required to comply with applicable emergency access standards from local and State authorities.

As described above, increased Project-related traffic would not cause a significant increase in congestion and or significantly worsen the existing service levels at intersections on area roads; therefore, Project-related traffic would not affect emergency access to the Project site or any other surrounding locations. The proposed Project would coordinate with the City of Sanger Department of Public Works for public road closures if necessary. This could temporarily inhibit access by emergency vehicles. Once construction is complete, operation of the Project would not hinder emergency vehicle access. Therefore, the proposed Project would not result in inadequate emergency access, and the impact would be less than significant.

***MITIGATION MEASURE(S)***

No mitigation is required.

***LEVEL OF SIGNIFICANCE***

Impacts would be *less than significant*.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
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**3.4.18 - TRIBAL CULTURAL RESOURCES**

Would the Project:

- a. 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:

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

<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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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.

<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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**Discussion**

The discussion below is based on the Cultural Resources Study and Evaluation completed for the Project, attached as Appendix C (Applied EarthWorks, Inc. 2025).

**Impact #3.4.18a(i) – 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 – 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)?**

See the discussion presented in Section 3.4.5 - *Cultural Resources*, Impacts #3.4.5a through 3.4.5c.

On March 13, 2025 pursuant to Public Resources Code §21080.3.1 and Government Code §65300 *et seq*, letters were sent to each of the Native American tribes within the geographic area as identified by the NAHC (see Appendix B). The letters included a Project description and location maps. To date, no requests for consultation have been received from the tribes that were contacted.

Upon any ground-breaking activity, there is the possibility of uncovering an object of cultural value. Mitigation Measures MM CUL-1 through MM CUL-3 must be implemented if any artifacts or human remains are discovered. Therefore, the Project would have a less than significant impact with mitigation incorporated.

**MITIGATION MEASURE(S)**

Implementation of Mitigation Measures MM CUL-1 through MM CUL-3.

**LEVEL OF SIGNIFICANCE**

Impacts would be *less than significant with mitigation incorporated*.

**Impact #3.4.18a(ii) – 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 – 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?**

See discussion for Impacts #3.4.5a through #3.4.5c and Impact #3.4.18a(i) above.

**MITIGATION MEASURE(S)**

Implementation of Mitigation Measures MM CUL-1 through MM CUL-3.

**LEVEL OF SIGNIFICANCE**

Impacts would be *less than significant with mitigation incorporated*.

**3.4.19 - UTILITIES AND SERVICE SYSTEMS**

Would the Project:

	Potentially Significant Impact	Less than Significant 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 stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Result in a determination by the wastewater treatment provider that 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Discussion**

**Impact #3.4.19a – Would the Project require or result in the relocation or construction of new or expanded water, wastewater treatment, or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?**

**Wastewater**

The City provides wastewater collection and treatment for its residents and businesses. The existing sewer system is comprised of a network of approximately 80 miles of sewer pipelines ranging from 6 to 30 inches in diameter and includes four lift stations and

associated force mains. Wastewater is conveyed by the collection system to the City's Wastewater Treatment Plant (WWTP) located southeast of the urban area, east of Newmark Avenue and south of North Avenue, adjacent to the Kings River (City of Sanger 2019).

Wastewater collection occurs through several main trunk lines which convey domestic sewer by gravity flow to the headworks of the treatment plant. The domestic WWTP consists of a headworks, grit chamber, two primary clarifiers, an activated sludge unit, secondary clarifiers, disinfection system, sludge thickener, anaerobic sludge digester, and a sludge holding tank. Currently, the disinfection system at the WWTP is not in use.

WDRs Order No. 2014-0004 allows the City's Domestic WWTP to discharge up to 3.0 million gallons per day (mgd). The City currently discharges undisinfecting secondary effluent to six evaporation/percolation ponds approximately three miles south of the WWTP, to a site known as "Lincoln Ponds" on Lincoln Avenue. A 4-mile, 20-inch PVC pipeline pumps treated effluent from the WWTP to the Lincoln Ponds, which are located on a City owned 120-acre parcel. The Lincoln Ponds cover approximately nine acres, each with a total capacity of 328 acre-feet. Three of the ponds are used for effluent disposal, and three are used only for "emergency purposes." The City does not currently recycle effluent discharged from the Domestic WWTP; however, the City is currently seeking interest from nearby agricultural and/or industrial water users to provide a beneficial use of the recycled water. The City is currently in the planning process of evaluating the feasibility of recycling treated effluent from the domestic WWTP on nearby land. The City may retain jurisdiction over the recycled water or collaborate with Central Irrigation District to deliver recycled water using existing infrastructure.

The current system has a capacity of 3,000,000 gallons per day. The City Sewer Management System had an existing flow of 1,784,917 gallons per day in 2007 for a population of 25,132. Sanger is currently developing an expanded sewer system to serve the projected population in 2035, which would have a capacity of 5.3 million gallons per day. According to the General Plan EIR, this would serve the growth to 2035 if five new trunk lines were constructed. Two have already been built. Therefore, the planned growth of the City of Sanger would account for the population and resulting wastewater system usage and can be accommodated.

### **Stormwater**

The Project is for the development of a new 269-lot single-family residential development. The proposed development would include connection to the City of Sanger for stormwater drainage and would be developed to City of Sanger standards. The use of City stormwater drainage infrastructure is not anticipated to have significant impacts and would result in a less than significant impact.

### **Water**

See Impact #3.4.10b.

The City has an estimated service population of approximately 26,617 people. In 2020, approximately 7,367 acre-feet (2,063 million gallons) of water was delivered to an estimated 6,973 water service connections of which approximately 61% of the water use is for residential services. The remainder are for commercial and industrial uses. The city currently utilizes local groundwater as its sole source of water supply. Groundwater is extracted by nine wells located within the city's SOI. In addition to production wells, the city has three surface storage structures.

The long-term operational water demand will be for the residential users and is anticipated to be approximately 48.36 million gallons per year or 148.41 acre-feet per year for the total build out of the Project. This is based on each residential lot having an average day water demand of 250 gallons per day across the entire buildout of 530 lots for the Project.

The Project is within the City SOI and growth within the SOI is what the UWMP considered in growth from 2025 to 2045. The Project water demand is included in the projected increase in water demand of 683 MG from 2025 to 2045 (Table 3.4.10-3). The Project long-term operational water demand is 0.7944% (118.917 MG/14,969 MG) of the available water supply in the city. The Project is accounted for in the UWMP and the UWMP is in agreement with the SKGSA GSP. Because of this, the Project water demand is available.

### **Electricity and Natural Gas**

The Pacific Gas and Electric Company (PG&E) provide electric and natural gas utilities to the City of Sanger. The Project is expected to connect to PG&E utilities via infrastructure extensions and connections that are acceptable to both PG&E and the City. The Project is not anticipated to result in additional construction related to new or expanded electrical or natural gas facilities.

### **Telecommunications Facilities**

The Project site is located in an area with urban development to the north and east where existing telecommunications facilities provide coverage. The Project does not propose or require the development of new or expanded telecommunications facilities.

### ***MITIGATION MEASURE(S)***

No mitigation is required.

### ***LEVEL OF SIGNIFICANCE***

Impacts would be *less than significant*.

**Impact #3.4.19b – Would the Project have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry and multiple dry years?**

See Impact#3.4.10b.

The Sanger UWMP indicates the City does not expect to have a water supply shortage through 2045 under normal or under drought conditions. The Project is within the City SOI and growth within the SOI is what the UWMP considered in growth from 2025 to 2045. The Project water demand is included in the projected increase in water demand of 683 MG from 2025 to 2045 (Table 3.4.10-3). The Project long-term operational water demand is 0.7944% (118.917 MG/14,969 MG) of the available water supply in the city.

The city updated the Water Master Plan and determined that the City does not have capacity to serve additional growth and proposed development projects until two new wells become operational. The two new wells (Well 19 and 22) are currently in various phases of construction. Well 22 is expected to be operational by Summer 2025 and Well 19 is anticipated to be operational by Spring 2026. Since the tables from the UWMP in this report were contingent upon extra supply wells being operational, the water supply for this Project will not be available until both new wells are operational by Spring 2026 (QK 2024).

It is anticipated that the City will have sufficient water to meet the Project's water demand with the completion of Well 19 and Well 22. Therefore, the City will have sufficient water supplies to service the Project and would result in a less than significant impact. .

**MITIGATION MEASURE(S)**

No mitigation is required.

**LEVEL OF SIGNIFICANCE**

Impacts would be *less than significant*.

**Impact #3.4.19c – Would the Project result in a determination by the wastewater treatment provider that 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?**

See Impact #3.4.19a above.

Planned improvements to the City's wastewater infrastructure are either planned, under development, or have been built to accommodate additional generated wastewater. Compliance with existing regulations and with UWMP recommendations and findings will ensure the resultant level of impact from development of the planned residential development would be maintained at a less than significant level.

**MITIGATION MEASURE(S)**

No mitigation is required.

**LEVEL OF SIGNIFICANCE**

Impacts would be *less than significant*.

**Impact #3.4.19d – Would the Project 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?**

The Mid Valley Disposal Service will provide solid waste services to the proposed Project site. Mid Valley Disposal maintains transfer stations within Fresno County with the nearest being the Fresno Transfer Station approximately 11 miles west. Once trash has been off-loaded at the transfer station, it is sorted, and non-recyclable solid waste is loaded onto large trucks and taken to the American Avenue Landfill located approximately six miles southwest of Kerman. The American Avenue Landfill (i.e., American Avenue Disposal Site 10-AA-0009) has a maximum permitted capacity of 32,700,000 cubic yards and a remaining capacity of 29,358,535 cubic yards, with an estimated closure date of August 31, 2031. The maximum permitted throughput is 2,200 tons per day. According to CalRecycle, residential land uses generate approximately 12.23 lbs/household/day. Operation of the proposed Project would generate approximately 6,481 pounds of solid waste per day or about 1,182 tons of solid waste per year. Given the available capacity at the landfills, the additional solid waste generated by the proposed Project is not expected to cause the facility to exceed its daily permitted capacity. As such, the Project would be served by a landfill with sufficient capacity to accommodate the Project's waste disposal needs, and impacts associated with the disposition of solid waste would be less than significant.

The Project does not propose any new or expanded uses and is therefore not anticipated to result in an increased generation of solid waste beyond what has already been analyzed in the City's General Plan EIR. Because the City's existing infrastructure has the capacity to accommodate the solid waste currently planned in the community plan for expanded population, it can be inferred that the existing solid waste infrastructure has adequate capacity to serve the proposed Project. The Project would not generate solid waste in excess of State or Local Standards. Impacts from Project construction would be less than significant.

***MITIGATION MEASURE(S)***

No mitigation is required.

***LEVEL OF SIGNIFICANCE***

Impacts would be *less than significant*.

**Impact #3.4.19e – Would the Project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?**

See discussion for Impact #3.4.19d.

The proposed Project would be required to provide solid waste and recycling services for residents pursuant to the California Solid Waste Reuse and Recycling Access Act of 1991. This service will be provided by Mid Valley Disposal.

The proposed Project would be required to provide solid waste and recycling services for residents pursuant to the California Solid Waste Reuse and Recycling Access Act of 1991. The Local Government Construction and Demolition (C&D) Guide of 2002 (SB 1374) amended this act to include construction and demolition material. This service will be provided by Mid Valley Disposal. Furthermore, the proposed Project would be required to comply with all federal, State, and local statutes and regulations related to the handling and disposal of solid waste. Therefore, implementation of the proposed Project would result in less-than-significant impacts

***MITIGATION MEASURE(S)***

No mitigation is required.

***LEVEL OF SIGNIFICANCE***

Impacts would be *less than significant*.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
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**3.4.20 - WILDFIRE**

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the Project:

- |  |                          |                          |                                     |                          |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a. Substantially impair an adopted emergency response plan or emergency evacuation plan?   | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose Project occupants to, pollutant concentration from a wildfire or the uncontrolled spread of a wildfire?  | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 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?  | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

**Discussion**

**Impact #3.4.20a – If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the Project substantially impair an adopted emergency response plan or emergency evacuation plan?**

See also Impact #3.4.9g, and Impact #3.4.9f regarding emergency response.

According to CAL FIRE, the Project site is located within an LRA Unzoned designated area (Cal Fire 2007). Given this designation, the Project site is outside of areas identified by CAL FIRE as having substantial or very high wildfire risk.

As noted previously, the Project will adhere to the standards set forth in the City Municipal Codes. The Project would also comply with the appropriate local and State requirements regarding emergency response plans and access. The proposed Project would not inhibit the

ability of local roadways to continue to accommodate emergency response and evacuation activities. Driveways and access points would be designed for ingress and egress of fire trucks and other emergency vehicles. Therefore, the Project would not impair the implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, and impacts would be less than significant

**MITIGATION MEASURE(S)**

No mitigation is required.

**LEVEL OF SIGNIFICANCE**

Impacts would be *less than significant*.

**Impact #3.4.20b – If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the Project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose Project occupants to, pollutant concentration from a wildfire or the uncontrolled spread of a wildfire?**

The Project site is not located in or near a State Responsibility Area and the Project will implement State and local fire code requirements. As such, the Project would not exacerbate the risk of exposure of Project occupants to wildfire and impacts would be less than significant.

**MITIGATION MEASURE(S)**

No mitigation is required.

**LEVEL OF SIGNIFICANCE**

Impacts would be *less than significant*.

**Impact #3.4.20c – If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the Project 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?**

See Impacts #3.4.9a and g, #3.4.20a and b above.

All road improvements would be completed in accordance with the applicable City of Sanger standards and specifications. Additionally, the Project would extend service laterals for potable water and other utilities from existing lines. Furthermore, the Project would be required to be consistent with the California Fire Code and City of Sanger Fire Code. Therefore, the Project would not exacerbate fire risk or result in temporary or ongoing impacts to the environment, and impacts would be less than significant.

**MITIGATION MEASURE(S)**

No mitigation is required.

**LEVEL OF SIGNIFICANCE**

Impacts would be *less than significant*.

**Impact #3.4.20d – If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the Project 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?**

See Impacts # 3.4.9a and g, #3.4.20a, b, and c above.

The Project is not located near State Responsibility Areas or lands classified as very high fire hazard severity zones. The City and the Project site are topographically flat land. There are no slopes on or near the property, and the Project would not expose the people or structures to significant risks from downslope or downstream flooding or landslides due to a result of runoff, post-fire instability, or drainage changes.

Therefore, the Project would have a less-than-significant impact.

**MITIGATION MEASURE(S)**

No mitigation is required.

**LEVEL OF SIGNIFICANCE**

Impacts would be *less than significant*.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
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**3.4.21 - MANDATORY FINDINGS OF SIGNIFICANCE**

a. Does the Project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, 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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Does the Project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a Project are significant when viewed in connection with the effects of past Projects, the effects of other current Projects, and the effects of probable future Projects.)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Does the Project have environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Discussion**

**Impact #3.4.21a – 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, 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?**

As evaluated in this IS/MND, the proposed Project would not substantially degrade the quality of the environment; substantially reduce the habitat of a fish or wildlife species; cause a fish or wildlife population to drop below self-sustaining levels; threaten to eliminate a plant or animal community; reduce the number or restrict the range of an endangered, rare, or threatened species; or eliminate important examples of the major periods of California history or prehistory. With implementation of the mitigation measures recommended in this

document, the proposed Project would not have the potential to degrade the quality of the environment, significantly impact biological resources, or eliminate important examples of the major periods of California's history or prehistory. Therefore, with the following mitigation measures, the Project would have a less-than-significant impact.

**MITIGATION MEASURE(S)**

Implementation of Mitigation Measures MM BIO-1 through MM BIO-7, MM CUL-1 through MM CUL-3, and MM GEO-1.

**LEVEL OF SIGNIFICANCE**

The Project would have a *less-than-significant impact with mitigation incorporated*.

**Impact #3.4.21b - Does the Project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a Project are significant when viewed in connection with the effects of past Projects, the effects of other current Projects, and the effects of probable future Projects.)?**

As described in the impact analyses in Sections 3.4.1 through 3.4.20 of this IS/MND, any potentially significant impacts of the proposed Project would be reduced to a less-than-significant level following the incorporation of the mitigation measures listed. The proposed Project would not otherwise combine with impacts of related development to add considerably to any cumulative impacts in the region. With mitigation, the proposed Project would not have impacts that are individually limited but cumulatively considerable. Therefore, the Project would have a less-than-cumulatively-considerable impact with mitigation incorporated.

**MITIGATION MEASURE(S)**

Implementation of Mitigation Measures MM BIO-1 through MM BIO-7, MM CUL-1 through MM CUL-3, MM GEO-1, MM HAZ-1 through MM HAZ-3, and MM NSE-1.

**LEVEL OF SIGNIFICANCE**

The Project would have a *less-than-significant impact with mitigation incorporated*.

**Impact #3.4.21c - Does the Project have environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly?**

All of the Project’s impacts, both direct and indirect that are attributable to the Project were identified and mitigated. The Project mitigation measures will substantially reduce or eliminate the impacts of the Project. Therefore, the proposed Project would not either directly or indirectly cause substantial adverse effects on human beings because all potentially adverse direct impacts of the proposed Project are identified as having no impact, less-than-significant impact, or less-than-significant impact with mitigation.

**MITIGATION MEASURE(S)**

Implementation of Mitigation Measures MM BIO-1 through MM BIO-7, MM CUL-1 through MM CUL-3, MM GEO-1, MM HAZ-1 through MM HAZ-3, and MM NSE-1.

**LEVEL OF SIGNIFICANCE**

The Project would have a *less-than-significant impact with mitigation incorporated*.

## **SECTION 4 - LIST OF PREPARERS**

### ***Lead Agency- City of Sanger***

- David Brletic- Community Development Director
- Derek Sylvester- Senior Planner

### ***Consultants -***

#### ***QK***

- Jaymie Brauer – Project Manager QA/QC
- Thomas Kobayashi – Lead Author
- Robert E. Parr, MS, RPA– Lead Author, Archaeological Technical Memo
- Dave Dayton, Principal Biologist
- Brian Shoener, P.E. – Lead Author, WSA

### ***Krazan & Associates, Inc.- Phase 1 ESA***

- Remington R. Alexander. P.E.

### ***Krazan & Associates, Inc.- Geotechnical Engineering Investigation***

- David RE. Jorosz, II, P.E.

### ***Peters Engineering- Traffic Study***

- John Rowland, P.E.

### ***WJV ACOUSTICS, INC.- Acoustical Analysis***

- Walter J. Van Groningen

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**SECTION 6 - MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Monitoring Program					
Impact	Mitigation Measure	Time Frame for Implementation	Responsible Monitoring Agency	Date	Initials
	<b>Aesthetics</b>				
	No Mitigation required.				
	<b>Agriculture and Forest Resources</b>				
	No Mitigation required.				
	<b>Air Quality</b>				
	No Mitigation required.				
	<b>Biological Resources</b>				
#1	<p><b>BIO-1:</b> Prior to ground-disturbing activities, a qualified wildlife biologist shall conduct a biological clearance survey between 14 and 30 days prior to the onset of construction.</p> <p>The clearance survey shall include walking transects to identify presence of San Joaquin kit fox, burrowing owl, nesting birds, and other special-status species. The pre-construction survey shall be walked by no greater than 30-foot transects for 100 percent coverage of the Project and a 50-foot buffer, where feasible. If no evidence of special-status species is detected, no further action is required except MM BIO-7 shall be implemented. A copy of the pre-construction survey report shall be submitted to the lead agency as evidence of compliance.</p>	Between 14 and 30 days prior to any construction-related activities if activities are to occur during February 1 and August 31.	<b>Lead Agency, Qualified Biologist; U.S. Fish and Wildlife Service, if necessary; and California Department of Fish and Wildlife if necessary.</b>		
		<p><b>Steps to Compliance:</b></p> <p>A. A qualified biologist shall be responsible for a preconstruction survey.</p> <p>B. If necessary, the qualified biologist shall contact CDFW and USFWS to determine next steps.</p> <p>C. The qualified biologist shall prepare a brief report to be submitted to the wildlife agencies within 5 days of completion of the preconstruction survey.</p> <p>D. Lead Agency shall verify compliance.</p>			
#2	<p><b>BIO-2:</b> The following avoidance and minimization measures shall be implemented during all phases of the Project to reduce the potential for impact from the Project. They are modified from the U.S. Fish and Wildlife Service Standardized Recommendations for Protection of the Endangered SJKF Prior to or During Ground Disturbance (USFWS 2011, Appendix F).</p> <p>a. All food-related trash items such as wrappers, cans, bottles, and food scraps shall be disposed of in securely closed</p>	<b>b</b>	<b>Project contractors, Lead Agency</b>		
		<p><b>Steps to Compliance:</b></p> <p>A. The developer or contractor shall ensure compliance with the listed measures.</p> <p>B. The Lead Agency shall verify compliance.</p>			

Mitigation Monitoring Program					
Impact	Mitigation Measure	Time Frame for Implementation	Responsible Monitoring Agency	Date	Initials
	<p>containers. All food-related trash items such as wrappers, cans, bottles, and food scraps shall be disposed of in securely closed containers and removed at least once a week from the construction of the Project site.</p> <p>b. Construction-related vehicle traffic shall be restricted to established roads and predetermined ingress and egress corridors, staging, and parking areas. Vehicle speeds shall not exceed 20 miles per hour (mph) within the Project site.</p> <p>c. To prevent inadvertent entrapment of kit fox or other animals during construction, the contractor shall cover all excavated, steep-walled holes or trenches more than two feet deep at the close of each workday with plywood or similar materials. If holes or trenches cannot be covered, one or more escape ramps constructed of earthen fill or wooden planks shall be installed in the trench. Before such holes or trenches are filled, the contractor shall thoroughly inspect them for entrapped animals. All construction-related pipes, culverts, or similar structures with a diameter of four inches or greater that are stored on the Project site shall be thoroughly inspected for wildlife before the pipe is subsequently buried, capped, or otherwise used or moved in any way. If at any time an entrapped or injured kit fox is discovered, work in the immediate area shall be temporarily halted, and USFWS and CDFW shall be consulted.</p> <p>d. Kit foxes are attracted to den-like structures such as pipes and may enter stored pipes and become trapped or injured. All construction pipes, culverts, or similar structures with a diameter of four inches or greater that are stored at a construction site for one or more overnight periods shall be thoroughly inspected for kit foxes before the pipe is subsequently buried, capped, or otherwise used or moved in</p>				

Mitigation Monitoring Program					
Impact	Mitigation Measure	Time Frame for Implementation	Responsible Monitoring Agency	Date	Initials
	<p>any way. If a kit fox is discovered inside a pipe, that section of pipe shall not be moved until the USFWS and CDFW have been consulted. If necessary, and under the direct supervision of the biologist, the pipe may be moved only once to remove it from the path of construction activity until the fox has escaped.</p> <p>e. No pets, such as dogs or cats, shall be permitted on the Project sites to prevent harassment, mortality of kit foxes, destruction of dens.</p> <p>f. Use of anti-coagulant rodenticides and herbicides in project sites shall be restricted. This is necessary to prevent primary or secondary poisoning of kit foxes and the depletion of prey populations on which they depend. All uses of such compounds shall observe labels and other restrictions mandated by the U.S. Environmental Protection Agency, California Department of Food and Agriculture, and other State and federal legislation, as well as additional Project-related restrictions deemed necessary by the USFWS and CDFW. If rodent control must be conducted, zinc phosphide shall be used because of the proven lower risk to kit foxes.</p> <p>g. A representative shall be appointed by the Project proponent who will be the contact source for any employee or contractor who might inadvertently kill or injure a kit fox or who finds a dead, injured, or entrapped kit fox. The representative shall be identified during the employee education program, and their name and telephone number shall be provided to the USFWS.</p> <p>h. The Sacramento Fish and Wildlife Office of USFWS and CDFW shall be notified in writing within three working days of the accidental death or injury to a SJKF during Project-related activities. Notification must include the date, time, and</p>				

Mitigation Monitoring Program					
Impact	Mitigation Measure	Time Frame for Implementation	Responsible Monitoring Agency	Date	Initials
	<p>location of the incident or of the finding of a dead or injured animal and any other pertinent information. The USFWS contact is the Chief of the Division of Endangered Species at the addresses and telephone numbers below. The CDFW contact can be reached at (559) 243-4014 and R4CESA@wildlifeca.gov.</p> <p>i. All sightings of the SJKF shall be reported to the California Natural Diversity Database (CNDDDB). A copy of the reporting form and a topographic map clearly marked with the location of where the kit fox was observed shall also be provided to the Service at the address below.</p> <p>j. Any Project-related information required by the USFWS or questions concerning the above conditions or their implementation may be directed in writing to the U.S. Fish and Wildlife Service at: Endangered Species Division, 2800 Cottage Way, Suite W 2605, Sacramento, California 95825-1846, phone: (916) 414-6620 or (916) 414-6600.</p> <p>k. New sightings of SJKF should be reported to the CNDDDB.</p>				
#3	<p><b>BIO-3:</b> Within 14 days prior to the start of Project ground-disturbing activities, a pre-activity survey with a 500-foot buffer shall be conducted by a qualified biologist knowledgeable in the identification of these species and approved by the CDFW. If dens/burrows that could support any of these species are discovered during the pre-activity survey conducted under MM BIO-1, the avoidance buffers outlined below should be established. No work would occur within these buffers unless the biologist approves and monitors the activity.</p> <p>San Joaquin Kit Fox</p> <ul style="list-style-type: none"> <li>• Potential or Atypical den – 50 feet</li> <li>• Known den – 100 feet</li> </ul>	14 day prior to ground-disturbing activities.	Qualified biologist, Project contractors		
		<p><b>Steps to Compliance:</b></p> <p>A. A qualified biologist shall conduct a preconstruction survey.</p> <p>B. The qualified biologist and project proponent shall ensure that no work occurs within the avoidance buffer established after the survey.</p> <p>C. The Lead Agency shall verify compliance.</p>			

Mitigation Monitoring Program					
Impact	Mitigation Measure	Time Frame for Implementation	Responsible Monitoring Agency	Date	Initials
	<ul style="list-style-type: none"> <li>Natal or pupping den – 500 feet, unless otherwise specified by CDFW</li> </ul>				
#4	<p><b>BIO-4:</b> If construction is planned outside the nesting period for raptors (other than burrowing owl) and migratory birds (February 15 to August 31), no mitigation shall be required. If construction is planned during the nesting season for migratory birds and raptors, a pre-construction survey to identify active bird nests shall be conducted by a qualified biologist to evaluate the site and a 250-foot buffer for migratory birds and a 500-foot buffer for raptors. If nesting birds are identified during the survey, active raptor nests shall be avoided by 500 feet and all other migratory bird nests shall be avoided by 250 feet. Avoidance buffers may be reduced if a qualified on-site monitor determines that encroachment into the buffer area is not affecting nest building, the rearing of young, or otherwise affecting the breeding behaviors of the resident birds. Because nesting birds can establish new nests or produce a second or even third clutch at any time during the nesting season, nesting bird surveys shall be repeated every 30 days as construction activities are occurring throughout the nesting season.</p> <p>No construction or earth-moving activity shall occur within a non-disturbance buffer until it is determined by a qualified biologist that the young have fledged (left the nest) and have attained sufficient flight skills to avoid project construction areas. Once the migratory birds or raptors have completed nesting and young have fledged, disturbance buffers will no longer be needed and may be removed, and monitoring may cease.</p> <p>A copy of the pre-construction survey report shall be submitted to the lead agency as evidence of compliance.</p>	<p>14 day prior to ground-disturbing activities and during construction.</p> <p><b>Steps to Compliance:</b></p> <p>A. If construction occurs outside nesting period of February 15 to August 31, no further action is necessary.</p> <p>B. If construction occurs inside nesting period then a qualified biologist shall be responsible for a preconstruction survey and establish the necessary buffers.</p> <p>C. A copy of the pre-construction survey report shall be submitted to the lead agency.</p> <p>D. The Lead Agency shall verify compliance.</p>	<p><b>Qualified biologist, Project contractors, Lead Agency</b></p>		
#5		14 and 30 days prior to ground-disturbing	Qualified biologist, Project contractors, Lead Agency		

Mitigation Monitoring Program																				
Impact	Mitigation Measure			Time Frame for Implementation	Responsible Monitoring Agency	Date	Initials													
	<p><b>BIO-5:</b> A qualified biologist shall conduct a pre-construction survey on the project site and within 500 feet of its perimeter, where feasible, to identify the presence of the western burrowing owl. The survey shall be conducted between 14 and 30 days prior to the start of construction activities. If any burrowing owl burrows are observed during the pre-construction survey, avoidance measures shall be consistent with those included in the CDFW Staff Report on Burrowing Owl Mitigation (CDFG 2012). If occupied burrowing owl burrows are observed outside of the breeding season (September 1 through January 31) and within 250 feet of proposed construction activities, a passive relocation effort may be instituted in accordance with the guidelines established by the California Burrowing Owl Consortium (1993) and the California Department of Fish and Wildlife (2012). During the breeding season (February 1 through August 31), a 500-foot (minimum) buffer zone shall be maintained unless a qualified biologist verifies through non-invasive methods that either the birds have not begun egg laying and incubation or that juveniles from the occupied burrows are foraging independently and are capable of independent survival.</p> <p>In addition, impacts to occupied burrowing owl burrows shall be avoided in accordance with the following table unless a qualified biologist approved by CDFW verifies through non-invasive methods that either: (1) the birds have not begun egg laying and incubation; or (2) that juveniles from the occupied burrows are foraging independently and are capable of independent survival.</p> <table border="1" data-bbox="235 1242 1052 1388"> <thead> <tr> <th rowspan="2">Location</th> <th rowspan="2">Time of Year</th> <th colspan="3">Level of Disturbance</th> </tr> <tr> <th>Low</th> <th>Med</th> <th>High</th> </tr> </thead> <tbody> <tr> <td>Nesting Sites</td> <td>April 1 – Aug 15</td> <td>200 m</td> <td>500 m</td> <td>500 m</td> </tr> </tbody> </table>			Location	Time of Year	Level of Disturbance			Low	Med	High	Nesting Sites	April 1 – Aug 15	200 m	500 m	500 m	activities and during construction.			
Location	Time of Year	Level of Disturbance																		
		Low	Med	High																
Nesting Sites	April 1 – Aug 15	200 m	500 m	500 m																
<p><b>Steps to Compliance:</b></p> <ul style="list-style-type: none"> <li>A. A qualified biologist shall conduct a preconstruction survey.</li> <li>B. The qualified biologist shall implement the listed measures should a burrow or owl be observed during the preconstruction survey.</li> <li>C. The Lead Agency shall verify compliance.</li> </ul>																				

Mitigation Monitoring Program									
Impact	Mitigation Measure					Time Frame for Implementation	Responsible Monitoring Agency	Date	Initials
	Nesting Sites	Aug 16 – Oct 15	200 m	200 m	500 m				
	Nesting Sites	Oct 16 - Mar 31	50 m	100 m	500 m				
#6	<p><b>BIO-6:</b> If construction work occurs after August 30 and ends before March 1 (outside of the breeding season), impacts to the Swainson's hawk would be avoided. Surveys would not be required for work conducted during this part of the year, and no further mitigation for nest disturbance is required.</p> <p>1. Protocol Surveys. For work that begins between March 1 and August 30, a qualified biologist with expertise in Swainson's hawk shall conduct protocol surveys of potential nesting habitat within 0.5 mile of any construction activities prior to initiation of such activities. The project applicant shall conduct a protocol-level survey in conformance with the "Recommended Timing and Methodology for Swainson's Hawk Nesting Surveys in California's Central Valley," Swainson's Hawk Technical Advisory Committee (TAC) (<a href="https://www.wildlife.ca.gov/conservation/survey-protocols#377281284-birds">https://www.wildlife.ca.gov/conservation/survey-protocols#377281284-birds</a>) (May 31, 2000) hereby incorporated by reference. This protocol prescribes minimum standards for survey equipment, mode of survey, angle and distance to tree, speed, visual and audible clues, distractions, notes and observations, and timing of surveys.</p> <p>A written report with the pre-construction survey results must be provided to the Planning Department and CDFW within 30 days of the commencement of construction-related activities. The report shall include: the date of the report,</p>					14 and 30 days prior to ground-disturbing activities and during construction	Qualified biologist, Project contractors, Lead Agency		
						<p><b>Steps to Compliance:</b></p> <p>A. A qualified biologist shall conduct a preconstruction survey.</p> <p>B. The qualified biologist shall implement the listed measures should construction work occur during the breeding season.</p> <p>C. The Lead Agency shall verify compliance.</p>			

Mitigation Monitoring Program					
Impact	Mitigation Measure	Time Frame for Implementation	Responsible Monitoring Agency	Date	Initials
	<p>authors and affiliations, contact information, introduction, methods, study location, including map, results, discussion, and literature cited.</p> <p>If the required protocol surveys show there are no active Swainson's hawk nests within the 0.5-mile of construction activities, then no further mitigation for nest disturbance will be required. If protocol surveys show that there are no active Swainson's hawk nests within 10 miles of the site, then no further mitigation for foraging impacts will be required.</p> <p>2. Nest Avoidance. If nesting Swainson's hawks are observed within 0.5-mile of the project site during the protocol surveys, the project applicant must implement CDFW pre-approved mitigation measures to avoid nest impacts during construction. These measures include:</p> <ul style="list-style-type: none"> <li>a. All project-related activities with the potential to cause nest abandonment or forced fledging of young shall be avoided until the young have fledged.</li> <li>b. If disturbances, habitat conversions, or other project-related activities, that may cause nest abandonment or forced fledging, are necessary, within the nest protection buffer zone (0.5-mile), monitoring of the nest site by a qualified raptor biologist, funded by the project applicant, shall be required to determine if the nest is abandoned. If the nest is abandoned, but the nestlings are still alive, the project proponent is required to fund the recovery and hacking, that is the controlled release of captive reared young, of the nestling.</li> </ul>				

Mitigation Monitoring Program					
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	<p>c. The project applicant shall be required to coordinate with CDFW to determine if project activities with the potential to cause disturbance to nesting Swainson's hawks within the 0.5-mile buffer may proceed with a reduced nest buffer and an approved biological monitor. CDFW may authorize a reduced nest buffer with the presence of a monitoring biologist during construction activities to ensure that the nest is not disturbed. Routine disturbances such as agricultural activities, commuter traffic, and routine maintenance activities within 0.5-mile of an active nest are not prohibited.</p>				
#7	<p><b>BIO-7:</b> Prior to ground-disturbance activities, or within one week of being deployed at the Project site for newly hired workers, all construction workers at the Project site shall attend a Construction Worker Environmental Awareness Training and Education Program developed and presented by a qualified biologist.</p> <p>The Construction Worker Environmental Awareness Training and Education Program shall be presented by the biologist and shall include information on the life histories of special-status wildlife and plant species that may be encountered during construction activities, their legal protections, the definition of "take" under the Endangered Species Act, measures the project operator is implementing to protect the species, reporting requirements, specific measures that each worker must employ to avoid take of the species, and penalties for violation of the Act. Identification and information regarding special status or other sensitive species with the potential to occur on the Project site shall also be provided to construction personnel. The program shall include:</p>	<p>Prior to ground-disturbing activities or within one week of being deployed at the project site</p>	<p><b>Qualified biologist, Project contractors, Lead Agency</b></p>		
		<p><b>Steps to Compliance:</b></p> <p>A. A qualified biologist shall be responsible for preparing and conducting the Construction Worker Environmental Awareness Training and Education Program.</p> <p>B. Throughout construction the contractor shall ensure all new construction crew members receive the WEAT and sign an acknowledgement form.</p> <p>C. A copy of the training program and of the signed acknowledgement forms shall be maintained on-site for the duration of construction activities and also be provided to the Lead Agency.</p>			

Mitigation Monitoring Program					
Impact	Mitigation Measure	Time Frame for Implementation	Responsible Monitoring Agency	Date	Initials
	<ul style="list-style-type: none"> <li>An acknowledgment form signed by each worker indicating that environmental training has been completed.</li> <li>A copy of the training transcript and/or training video/CD, as well as a list of the names of all personnel who attended the training and copies of the signed acknowledgment forms, shall be maintained on-site for the duration of construction activities.</li> </ul>				
Cultural Resources					
#8	<p><b>CUL-1:</b> If prehistoric or historic-era cultural materials are encountered during construction activities, all work in the immediate vicinity of the find shall halt until a qualified archaeologist can evaluate the find and make recommendations. Cultural resource materials may include prehistoric resources such as flaked and ground stone tools and debris, shell, bone, ceramics, and fire-affected rock, as well as historic resources such as glass, metal, wood, brick, or structural remnants. If the qualified archaeologist determines that the discovery represents a potentially significant cultural resource, additional investigations may be required to mitigate adverse impacts from Project implementation. These additional studies may include avoidance, testing, and evaluation or data recovery excavation. Implementation of the mitigation measure below would ensure that the proposed Project would not cause a substantial adverse change in the significance of a historical resource</p>	During construction	Project contractors, Lead Agency		
		<p><b>Steps to Compliance:</b></p> <p>A. If necessary, work shall cease and the project proponent shall retain a qualified archaeologist and/or paleontologist to assess finds and recommended procedures.</p> <p>B. The qualified cultural resources specialist shall assess the significance of the find and determine next steps.</p> <p>C. The Lead Agency shall verify compliance.</p>			
#9		During construction	Project contractors, Lead Agency		

Mitigation Monitoring Program					
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	<p><b>MM CUL-2:</b> In the event that buried prehistoric archaeological resources are discovered during excavation and/or construction activities, construction shall stop in the immediate vicinity of the find and a qualified archaeologist shall be consulted to determine whether the resource requires further study. The qualified archaeologist shall make recommendations to the developer and City on the measures that shall be implemented to protect the discovered resources, including but not limited to excavation of the finds and evaluation of the finds in accordance with Section 15064.5 of the CEQA Guidelines.</p> <p>If the resources are determined to be unique prehistoric archaeological resources as defined under Section 15064.5 of the CEQA Guidelines, mitigation measures shall be identified by the monitor and required to the developer and City. Appropriate measures for significant resources could include avoidance or capping, incorporation of the site in green space, parks, or open space, or data recovery excavations of the finds. No further grading shall occur in the area of the discovery until the lead agency approves the measures to protect these resources.</p> <p>Any prehistoric archaeological artifacts recovered as a result of mitigation shall be provided to a City-approved institution or person who is capable of providing long-term preservation to allow future scientific study.</p>				
		<p>A. If necessary, work shall cease and the project proponent shall retain a qualified archaeologist to assess finds and recommended procedures.</p> <p>B. The qualified cultural resources specialist shall assess the significance of the find and determine next steps.</p> <p>C. The Lead Agency shall verify compliance.</p>			
<b>#10</b>	<p><b>CUL-3:</b> If human remains are discovered during construction or operational activities, further excavation or disturbance shall be prohibited pursuant to Section 7050.5 of the California Health and Safety Code. The specific protocol, guidelines, and channels of communication outlined by the Native American Heritage Commission, in accordance with Section 7050.5 of the Health and</p>	During construction	<b>Project contractors, Lead Agency</b>		
		<b>Steps for Compliance:</b>			

Mitigation Monitoring Program					
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	Safety Code, Section 5097.98 of the Public Resources Code (Chapter 1492, Statutes of 1982, Senate Bill 297), and Senate Bill 447 (Chapter 44, Statutes of 1987), shall be followed. Section 7050.5(c) shall guide the potential Native American involvement, in the event of a discovery of human remains, at the direction of the county coroner.	<ul style="list-style-type: none"> <li>A. If necessary, work shall cease and the project proponent shall retain a qualified archaeologist to assess finds and recommended procedures.</li> <li>B. The qualified cultural resources specialist shall assess the significance of the find and determine next steps.</li> <li>C. The Lead Agency shall verify compliance.</li> </ul>			
<b>Energy</b>					
	No Mitigation required.				
<b>Geology and Soils</b>					
#11	<p><b>GEO-1:</b> If any paleontological resources are encountered during ground-disturbance activities, all work within 25 feet of the find shall halt until a qualified paleontologist, as defined by the Society of Vertebrate Paleontology Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources (2010), can evaluate the find and make recommendations regarding treatment. Paleontological resource materials may include resources such as fossils, plant impressions, or animal tracks preserved in rock. The qualified paleontologist shall contact the Natural History Museum of Los Angeles County or another appropriate facility regarding any discoveries of paleontological resources.</p> <p>If the qualified paleontologist determines that the discovery represents a potentially significant paleontological resource, additional investigations and fossil recovery may be required to mitigate adverse impacts from Project implementation. If avoidance is not feasible, the paleontological resources shall be evaluated for their significance. If the resources are not significant, avoidance is not necessary. If the resources are significant, they shall be avoided</p>	During ground disturbance activities	Project contractors, Lead Agency		
		<ul style="list-style-type: none"> <li>A. In the event that paleontological resources are encountered during ground disturbance activities, all work within 25 feet shall halt.</li> <li>B. If required, the project proponent shall contact the qualified paleontologist to assess the find.</li> <li>C. The operator shall include a standard inadvertent discovery clause in every construction contract to inform contractors of this requirement.</li> <li>D. The Lead Agency shall verify compliance with the mitigation measure.</li> </ul>			

Mitigation Monitoring Program					
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	to ensure no adverse effects, or such effects must be mitigated. Construction in that area shall not resume until the resource-appropriate measures are recommended, or the materials are determined to be less than significant. If the resource is significant and fossil recovery is the identified form of treatment, then the fossil shall be deposited in an accredited and permanent scientific institution. Copies of all correspondence and reports shall be submitted to the Lead Agency.				
<b>Greenhouse Gas Emissions</b>					
No Mitigation required.					
<b>Hazardous Materials</b>					
#12	<b>MM HAZ-1:</b> In the event unknown underground storage tank(s) are uncovered or damaged during excavation or grading activities, all work in that area shall cease. The State Water Resources Control Board (SWRCB) and the Fresno County Environmental Health Division shall be contacted to determine what appropriate remediation may be required, and to identify the appropriate requirements and approvals. A report of all communication and the determination made by the SWRCB and the County Health Division shall be submitted to the City.	During construction	<b>Project contractors, Lead Agency</b>		
		<b>Steps to Compliance:</b> A. In the event unknown underground storage tank(s) are uncovered or damaged during excavation or grading activities all work in that area shall cease. B. The Lead Agency, State Water Resources Control Board, and Fresno County Environmental Health Division shall be contacted to determine appropriate remediation, and to identify necessary permits and approvals. C. All correspondence and determinations made by the SWRCB and County Health Division shall be provided to the Lead Agency to provide evidence of compliance.			
#13	<b>MM HAZ-2:</b> In the event an unknown septic system is uncovered or damaged during excavation or grading activities, all work in that area shall cease. The Fresno County Environmental Health Division shall be contacted to determine what appropriate remediation may be required, and to identify the appropriate requirements and	During construction	<b>Project contractors, Lead Agency</b>		
		<b>Steps to Compliance:</b>			

Mitigation Monitoring Program					
Impact	Mitigation Measure	Time Frame for Implementation	Responsible Monitoring Agency	Date	Initials
	approvals. A report of all communication and the determination made by the County Health Division shall be submitted to the City.	<p>A. In the event unknown septic system(s) are uncovered or damaged during excavation or grading activities all work in that area shall cease.</p> <p>B. The Lead Agency and Fresno County Environmental Health Division shall be contacted to determine appropriate remediation, and to identify necessary permits and approvals.</p> <p>C. All correspondence and determinations made by the County Health Division shall be provided to the Lead Agency to provide evidence of compliance.</p>			
<b>#14</b>	<b>MM HAZ-3:</b> In the event unknown water wells are uncovered or damaged during excavation or grading activities, all work in that area shall cease. The California Department of Water Resources and the California State Water Resources Control Board shall be contacted to determine what appropriate abandonment or remediation may be required, and to identify the appropriate requirements and approvals. A report of all communication and the determination made by the State agencies shall be submitted to the City.	During construction	<b>Project contractors, Lead Agency</b>		
		<p><b>Steps to Compliance:</b></p> <p>A. In the event unknown water well(s) are uncovered or damaged during excavation or grading activities all work in that area shall cease.</p> <p>B. The Lead Agency, California Department of Water Resources and State Water Resources Control Board shall be contacted to determine appropriate remediation, and to identify necessary permits and approvals.</p> <p>C. All correspondence and determinations made by the responsible agencies shall be provided to the Lead Agency to provide evidence of compliance.</p>			
	<b>Hydrology and Water Quality</b>				
	No Mitigation required.				
	<b>Land Use and Planning</b>				
	No Mitigation required.				
	<b>Mineral Resources</b>				
	No Mitigation required.				
	<b>Noise</b>				
<b>#15</b>	<b>NSE-1:</b> Added as a note on TTM 6394, air conditioning or mechanical ventilation shall be installed in the units so that it will be possible for	Prior to issuance of building permit	<b>Project contractors, Lead Agency</b>		

Mitigation Monitoring Program					
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	windows and doors to remain closed for sound insulation purposes to avoid exceeding City of Sanger interior noise thresholds.				
		A. The Project proponent shall submit plans to the Lead Agency for approval. B. The Lead Agency shall verify compliance with the mitigation measure.			
	<b>Population and Housing</b>				
	No Mitigation required.				
	<b>Public Services</b>				
	No Mitigation required.				
	<b>Recreation</b>				
	No Mitigation required.				
	<b>Traffic and Transportation</b>				
	No mitigation is required				
	<b>Tribal Cultural Resources</b>				
	Implement Mitigation Measures MM CUL-1 through MM CUL-3.				
	<b>Utilities and Service Systems</b>				
	No Mitigation required.				
	<b>Wildfire</b>				
	No Mitigation required.				

Appendices A-G can be found as  
a separate document