MALAGA COUNTY WATER DISTRICT

COMUNIDAD NUEVO LAGO MOBILE HOME PARK SEWER CONSOLIDATION PROJECT

DRAFT INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

FRESNO COUNTY, CALIFORNIA

PREPARED FOR:
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ACRONYMS & ABBREVIATIONS

AB ---------- Assembly Bill
APN ---------- Assessor's Parcel Number
BMP ---------- Best Management Practices
BUOW ---------- burrowing owl
CalEEMod ---------- California Emissions Estimator Modeling (software)
CARB ---------- California Air Resources Board
CBC ---------- California Building Code
CCAA ---------- California Clean Air Act
CDFW ---------- California Fish and Wildlife
CEQA ---------- California Environmental Quality Act
CH_4 ---------- Methane
CHRIS ---------- California Historical Resources Information System
CNDDB ---------- California Natural Diversity Database
CNPS ---------- California Native Plant Society
CO ---------- Carbon Monoxide
CO_2 ---------- Carbon dioxide
County ---------- Fresno County
CV-SALTS ---------- Central Valley Salinity Alternatives for Long-Term Sustainability
DOC ---------- Department of Conservation
DTSC ---------- Department of Toxic Substances Control
EIR ---------- Environmental Impact Report
FEMA ---------- Federal Emergency Management Agency
FTA ---------- Federal Transit Administration
GAMAQI ---------- Guide for Assessing and Mitigating Air Quality Impacts
GHG ---------- Greenhouse Gas
GSP ---------- Groundwater Sustainability Plan
GWP ---------- Global Warming Potential
IPaC ---------- U.S. Fish and Wildlife Service's Information for Planning and Consultation system
IS ---------- Initial Study
IS/MND ---------- Initial Study/Mitigated Negative Declaration
ITP ---------- Incidental Take Permit
LF ---------- linear feet
MCWD ---------- Malaga County Water District
MHP ---------- Mobile Home Park
MMRP ---------- Mitigation Monitoring and Reporting Program
MND ---------- Mitigated Negative Declaration
MRZ ---------- Mineral Resource Zone
MUTCD ---------- Manual on Uniform Traffic Control Devices
NAHC ---------- Native American Heritage Commission
ND ---------- Negative Declaration
NKGSA ---------- North Kings Groundwater Sustainability Agency
NO_2 ---------- Nitrogen dioxide
NOx ---------- Oxides of nitrogen
O_3 ---------- Ozone
PM_{10} ---------- particulate matter 10 microns in size
$PM_{2.5}$ ---------- particulate matter 2.5 microns in size
ppb ---------- parts per billion

ppm ---------- parts per million
Project ---------- Shady Lakes Mobile Home Park Sewer Consolidation Project
ROG ---------- Reactive Organic Gases
ROW ---------- Right-Of-Way
SJVAB ---------- San Joaquin Valley Air Basin
SJVAPCD ---------- San Joaquin Valley Air Pollution Control District
SO_2 ---------- Sulfur Dioxide
SOI ---------- Sphere of Influence
SSJVIC ---------- Southern San Joaquin Valley Information Center
SR ---------- State Route
SRA ---------- State Responsibility Area
SWPPP ---------- Storm Water Pollution Prevention Plan
SWRCB ---------- State Water Resources Control Board
TPY ---------- tons per year
USACE ---------- United States Army Corps of Engineers
USEPA ---------- United States Environmental Protection Agency
USFWS ---------- United States Fish and Wildlife Service
USGS ---------- United States Geological Survey
µg/m3 ---------- micrograms per cubic meter
WDR ---------- Waste Discharge Requirements
WWTF ---------- Wastewater Treatment Facility

CHAPTER 1 INTRODUCTION

Provost & Pritchard Consulting Group (Provost & Pritchard) has prepared this Initial Study/Mitigated Negative Declaration (IS/MND) on behalf of Malaga County Water District (MCWD) to address the potential environmental impacts of the Comunidad Nuevo Lago Mobile Home Park Consolidation Project (Project). This document has been prepared in accordance with the California Environmental Quality Act (CEQA), Public Resources Code Section 21000 et seq. The MCWD is the CEQA lead agency for this Project.

The site and the Project are described in detail in Chapter 2 Project Description.

1.1 REGULATORY INFORMATION

An Initial Study (IS) is a document prepared by a lead agency to determine whether a project may have a significant effect on the environment. In accordance with California Code of Regulations Title 14 (Chapter 3, Section 15000, *et seq.*)-- also known as the CEQA Guidelines--Section 15064 (a)(1) states that an environmental impact report (EIR) must be prepared if there is substantial evidence in light of the whole record that the Project under review may have a significant effect on the environment and should be further analyzed to determine mitigation measures or project alternatives that might avoid or reduce project impacts to less than significant levels. A negative declaration (ND) may be prepared instead if the lead agency finds that there is no substantial evidence in light of the whole record that the project may have a significant effect on the environment. An ND is a written statement describing the reasons why a proposed Project, not otherwise exempt from CEQA, would not have a significant effect on the environment and, therefore, why it would not require the preparation of an EIR (CEQA Guidelines Section 15371). According to CEQA Guidelines Section 15070, a ND or *mitigated* ND shall be prepared for a project subject to CEQA when either:

a. The IS shows there is no substantial evidence, in light of the whole record before the agency, that the proposed Project may have a significant effect on the environment, or
b. The IS identified potentially significant effects, but:
    1. Revisions in the project plans or proposals made by or agreed to by the applicant before the proposed MND and IS is released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur are prepared, and
    2. There is no substantial evidence, in light of the whole record before the agency, that the proposed Project as revised may have a significant effect on the environment.

1.2 DOCUMENT FORMAT

This IS/MND contains six chapters. Chapter 1 Introduction, provides an overview of the Project and the CEQA process. Chapter 2 Project Description provides a detailed description of proposed Project components and objectives. Chapter 3 Determination discusses the Lead Agency's determination based upon this initial evaluation. Chapter 4 Environmental Impact Analysis presents the CEQA checklist and environmental analysis for all impact areas, mandatory findings of significance, and feasible mitigation measures. Where the Project does not have the potential to significantly impact a given impact area, the relevant section provides a brief discussion of the reasons why no impacts are expected. If the Project could have a potentially significant impact on a resource, the impact area discussion provides a description of potential impacts, and appropriate mitigation measures and/or permit requirements that would reduce those impacts to a less than significant level. Chapter 5 Mitigation, Monitoring, and Reporting Program (MMRP) provides proposed mitigation measures, implementation timelines, and the entity/agency responsible for ensuring implementation. Chapter 6 References details the documents and reports this document relies upon to provide its analysis.

The CalEEMod Output Files and HARP2 Air Dispersion Output Files, Biological Resources Evaluation, and Phase I Cultural Resources Assessment, are provided as technical Appendix A, Appendix B, and Appendix C, respectively, at the end of this document.

CHAPTER 2 PROJECT DESCRIPTION

2.1 PROJECT BACKGROUND

2.1.1 PROJECT TITLE

Comunidad Nuevo Lago Mobile Home Park Sewer Consolidation Project

2.1.2 LEAD AGENCY NAME AND ADDRESS

Malaga County Water District
3580 S. Frank Avenue
Fresno, CA 93725

2.1.3 CONTACT PERSON AND PHONE NUMBER

Charles Garabedian
Board President
(559) 485-7353

2.1.4 CEQA CONSULTANT

Provost & Pritchard Consulting Group
Ryan McKelvey, Environmental Project Manager
(559) 636-1166

2.1.5 PROJECT LOCATION

The Project site is located in Fresno County, California, approximately 160 miles southeast of Sacramento and 93 miles northwest of Bakersfield (see Figure 2-1 and Figure 2-2 for Project location). The Project site is located on Assessor's Parcel Numbers (APNs) 334-330-75, 330-100-09ST and 330-100-12T. The centroid of the Project Site is 36° 40' 52.21" N, 119° 42' 16.00" W.

2.1.6 GENERAL PLAN DESIGNATION AND ZONING

Table 2-1: Project Site General Plan Designation and Zoning

Project Area	General Plan Designation	Zoning District
ONSITE	Agriculture/Open Space	Limited Agricultural (AL-20) Exclusive Agricultural (AE-20)
ADJACENT LANDS	Agriculture/Open Space	AL-20 AE-20

2.1.7 DESCRIPTION OF THE PROJECT

2.1.7.1 PROJECT BACKGROUND AND PURPOSE

Comunidad Nuevo Lago Mobile Home Park (MHP) is a 65-space mobile home park located approximately one mile south of Malaga County Water District (MCWD) on the west side of Chestnut Avenue between Jefferson and Lincoln Avenues. Prior to 2024, the MHP was called Shady Lakes MHP. The residents formed Comunidad Nuevo Lago Inc and purchased the MHP in 2024. With the new ownership, the name has been changed to Comunidad Nuevo Lago MHP (formerly Shady Lakes).

The MHP currently operates a domestic wastewater treatment facility subject to Waste Discharge Requirements (WDR) Order No. 75-079. The WDR permits a 30-day mean daily flow of up to 17,000 gallons per day of domestic wastewater treated in a package extended aeration sewage treatment plant, with disposal via evaporation and percolation pond(s) or effluent reuse on permanent pasture. The MHP's wastewater treatment facility (WWTF) is located on the same parcel as the residences (APN 334-330-75), which was originally constructed in the early 1970s.

The MHP has received several notices of threatened violation and notices of violation for non-compliance with the WDR. These notices were related to objectionable odors, several effluent limit exceedances for biochemical oxygen demand (BOD) and settleable matter, and new requirements related to Central Valley Salinity Alternatives for Long-Term Sustainability (CV-SALTS).

The MCWD owns and operates a WWTF serving the community of Malaga. The MCWD WWTF is located at the northwest corner of Central and Maple Avenues. A portion of the wastewater and disposal facilities were originally constructed in the late 1950's. Significant expansions were constructed in 1968 and then again in 1996. Incremental expansions, improvements, or modifications have been constructed since 1996. While the MCWD WWTF has had no recent discharge violations, it is in need of upgrades to meet current capacity and continue to meet its waste discharge requirements, including improvements to provide nitrification and denitrification.

The State Water Resources Control Board (SWRCB), who is providing funding for this Project under the Technical Assistance Funding Program, strongly supports voluntary participation in sewer system consolidation projects. As the MHP's existing WWTF is in poor condition, and the infrastructure is in need of upgrades, the Project proposes the consolidation of the sewer treatment systems for the MHP with MCWD.

2.1.7.2 PROJECT DESCRIPTION

The Project proposes to construct a new lift station at the MHP, a new force main from the MHP to the MCWD Sphere of Influence (SOI) boundary at American Ave and Chestnut Ave, and a gravity sewer main as master planned to the point of connection with the existing MCWD sewer collection system. This includes extending the 15-inch sewer main in Maple Avenue from the WWTF to Malaga Avenue, a 12-inch sewer main in Malaga Avenue from Maple to Chestnut, then south in Chestnut to American Avenue. Extension of the gravity sewer line would allow for service of the area without the requirement for existing private lift stations which serve a few properties along the proposed pipeline route. Extension of the new 12-inch pipeline in Malaga Avenue would include the abandoning the existing 6-inch sewer main in Malaga Avenue and connection of the existing services to the new sewer main. Extension of the 12-inch diameter pipeline in Malaga Avenue would also allow for the connection of several properties that are presently served by septic tanks and leach fields. Similarly, extension of the new 12-inch sewer main in Chestnut Avenue south of Malaga would include the elimination of the existing 6-inch pipeline and relocation of the existing services to the new sewer main. The Project would also include improvements to the existing MCWD WWTF. This includes demolishing the equipment in the Dissolved Air Flotation (DAF) basin, installing one recirculating pump in the 3rd aeration basin, installing oil and grease removal in grit chamber, modifying the air piping, installing recirculation flow meter and sludge flow meters, removal of berms between disposal pond 1, 2 and 5, replacing one influent pump, replacing one blower, and constructing new circular clarifiers. Once the connection to the MCWD is completed, the existing MHP WWTF would need to be properly demolished.

The proposed force main would be four (4) inches in diameter and approximately 4,000 linear feet (LF) long. The force main will include crossing of two Fresno Irrigation District Canals (Oleander Canal and Washington Colony Canal) by either jack and bore or directional drilling. The 15-inch gravity sewer main would be approximately 2,300 LF. The 12-inch gravity sewer main would be approximately 5,300 LF. The design includes twenty (20), 4-ft diameter manholes along the gravity sewer main alignment.

2.1.7.2.1 CONSOLIDATION PROCESS

The Project would not require MCWD to update its SOI and annex the MHP. While the MHP is outside of the MCWD SOI and service area, MCWD would be willing to enter into an Outside Agency Service Agreement (Agreement) pursuant to Government Code Section 56133.

2.1.7.2.2 OPERATIONS DURING CONSTRUCTION

Impacts to both treatment plants operations would need to be minimized during construction. This would be primarily accomplished by effective scheduling of work activities, with some temporary bypass of flows.

Installation of pipelines, absent the final connections to the existing systems and discharges to the MCWD WWTF, would be completed concurrently with other tasks. Traffic control, dust control, and worker protection would be accomplished throughout the duration of construction so as to minimize impacts to the MHP, MCWD, and the public. Detours of traffic and exclusion of pedestrians from the work area are routinely managed by construction contractors and would be coordinated with the MHP and MCWD for work affecting the respective facilities.

It is a basic requirement that each downstream portion of the improvements be completed prior to upstream components being placed into service:

- MCWD WWTF disposal ponds must be ready to receive treated wastewater for disposal prior to the MCWD WWTF discharge pipeline being placed in service.
- MCWD WWTF process improvements must be complete to ensure wastewater discharges meet WDRs prior to receiving flows from the MHP.
- The MCWD gravity pipeline needs to be completed and ready to receive flows prior to the MHP force main receiving flows from the MHP lift station. Diversion of the MHP collection system to the new lift station can only take place after all prior portions of the project are complete.
- The MHP collection system must be connected to the new lift station prior to decommissioning and demolition of MHP WWTF and ponds.

The MHP lift station would be sited in a manner such that it can be completed offline from the collection system without impacting the operation of the existing plant. On completion of the lift station, a manhole would be constructed to intercept the collection system upstream of the MHP WWTF. When all downstream components are complete, flows would be diverted and the MHP collection system connection to the MHP WWTF would be severed. Decommissioning of the MHP WWTF would then proceed.

The effluent disposal facilities improvements at the MCWD WWTF, consisting of the pond modifications, can take place concurrently with work at the MHP and other areas in the Fresno County right-of-way (ROW).

Improvements and repairs within the plant, such as replacement of an influent screw pump, replacement of a blower, addition of a recirculation pump, modifications to the anoxic basin, and installation of clarifiers can be accomplished by utilizing existing redundancy in the facilities to isolate work areas or installation of temporary bypass piping and pumping.

The new circular clarifiers would need to be sited outside the footprint of the existing plant and connection of piping coordinated with the treatment plant operator to minimize disruption to the operation of the rectangular clarifiers, at least one of which would need to remain in service throughout.

2.1.7.3 CONSTRUCTION SCHEDULE

Construction is anticipated over approximately 24 months. Generally, construction would occur between the hours of 6 am and 6 pm, Monday through Saturday, excluding holidays. Construction would require temporary staging and storage of materials and equipment onsite.

2.1.7.4 EQUIPMENT

Construction equipment would likely include excavators, backhoes, graders, loaders, saws, compactors, hauling trucks, and water trucks.

2.1.7.5 OPERATION AND MAINTENANCE

The newly installed gravity sewers and all infrastructure within the MCWD existing boundaries would be owned, operated, and maintained by MCWD. The MHP sewer collection system upstream of the lift station would remain the responsibility of the MHP. The lift station would be situated on MHP property, leaving the MHP responsible for its operation and maintenance.

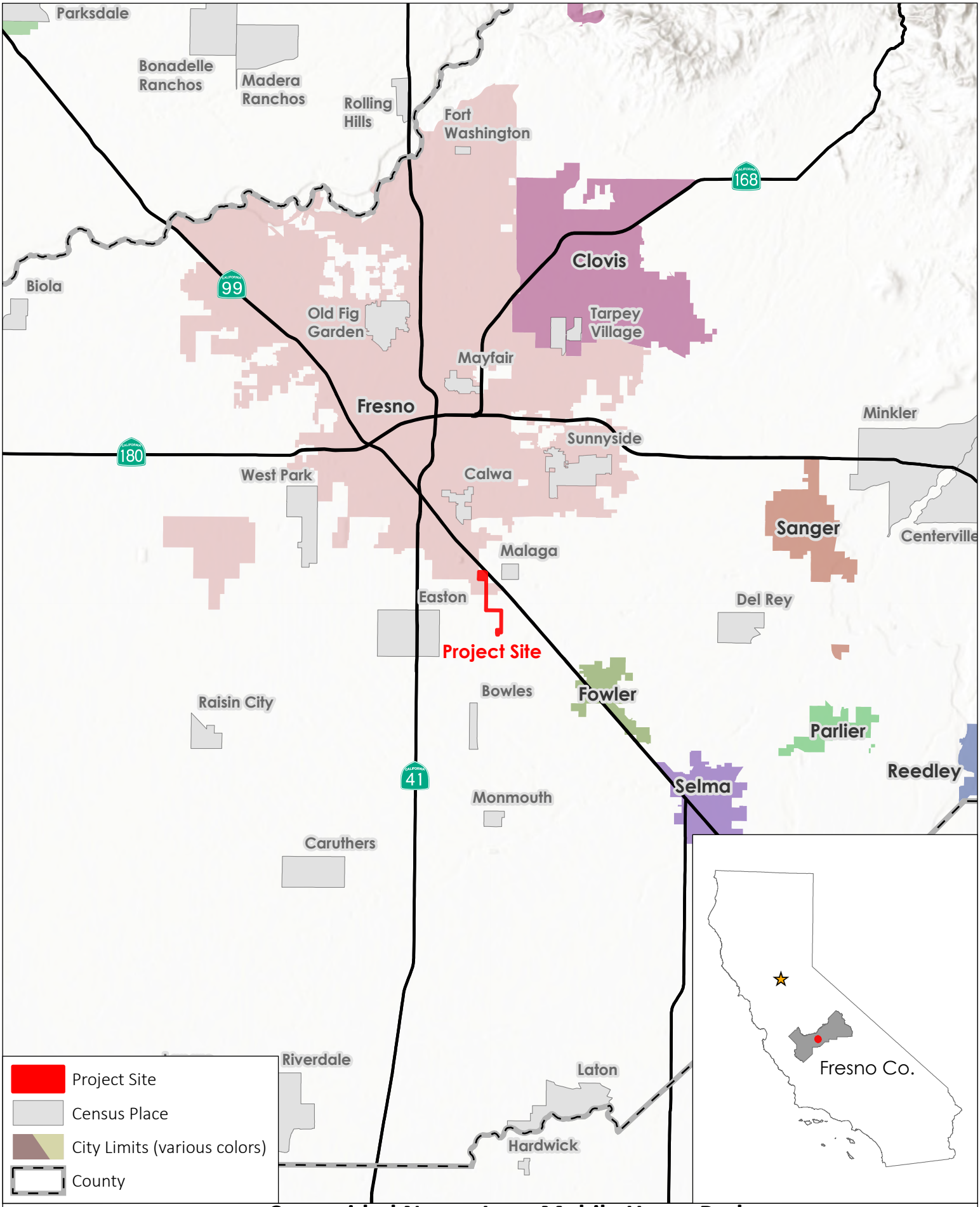
2.1.8 OTHER PUBLIC AGENCIES WHOSE APPROVAL MAY BE REQUIRED

- California Department of Fish & Wildlife
- State Water Resources Control Board
- Regional Water Quality Control Board
- United States Army Corps of Engineers

2.1.9 CONSULTATION WITH CALIFORNIA NATIVE AMERICAN TRIBES

Public Resources Code Section 21080.3.1, *et seq. (codification of Assembly Bill (AB) 52, 2013-14)*) requires that a lead agency, within 14 days of determining that it will undertake a project, must notify in writing any California Native American Tribe traditionally and culturally affiliated with the geographic area of the project if that Tribe has previously requested notification about projects in that geographic area. The notice must briefly describe the project and inquire whether the Tribe wishes to initiate request formal consultation. Tribes have 30 days from receipt of notification to request formal consultation. The lead agency then has 30 days to initiate the consultation, which then continues until the parties come to an agreement regarding necessary mitigation or agree that no mitigation is needed, or one or both parties determine that negotiation occurred in good faith, but no agreement will be made.

The Malaga County Water District has not received any written correspondence from Tribes pursuant to Public Resources Code Section 21080.3.1 requesting notification of proposed project.



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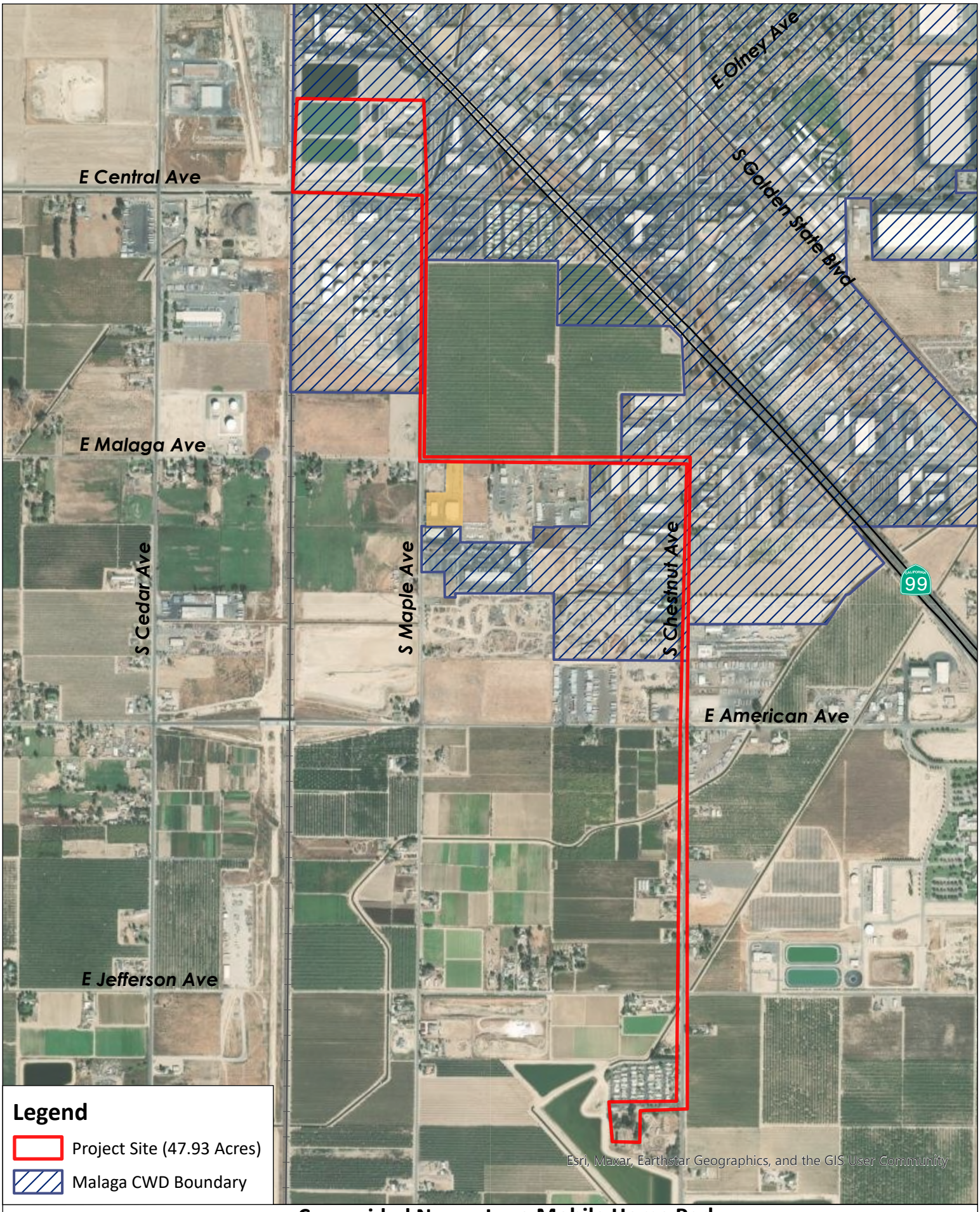

Legend

- Project Site (47.93 Acres)
- Malaga CWD Boundary

0 0.1 0.2

Miles

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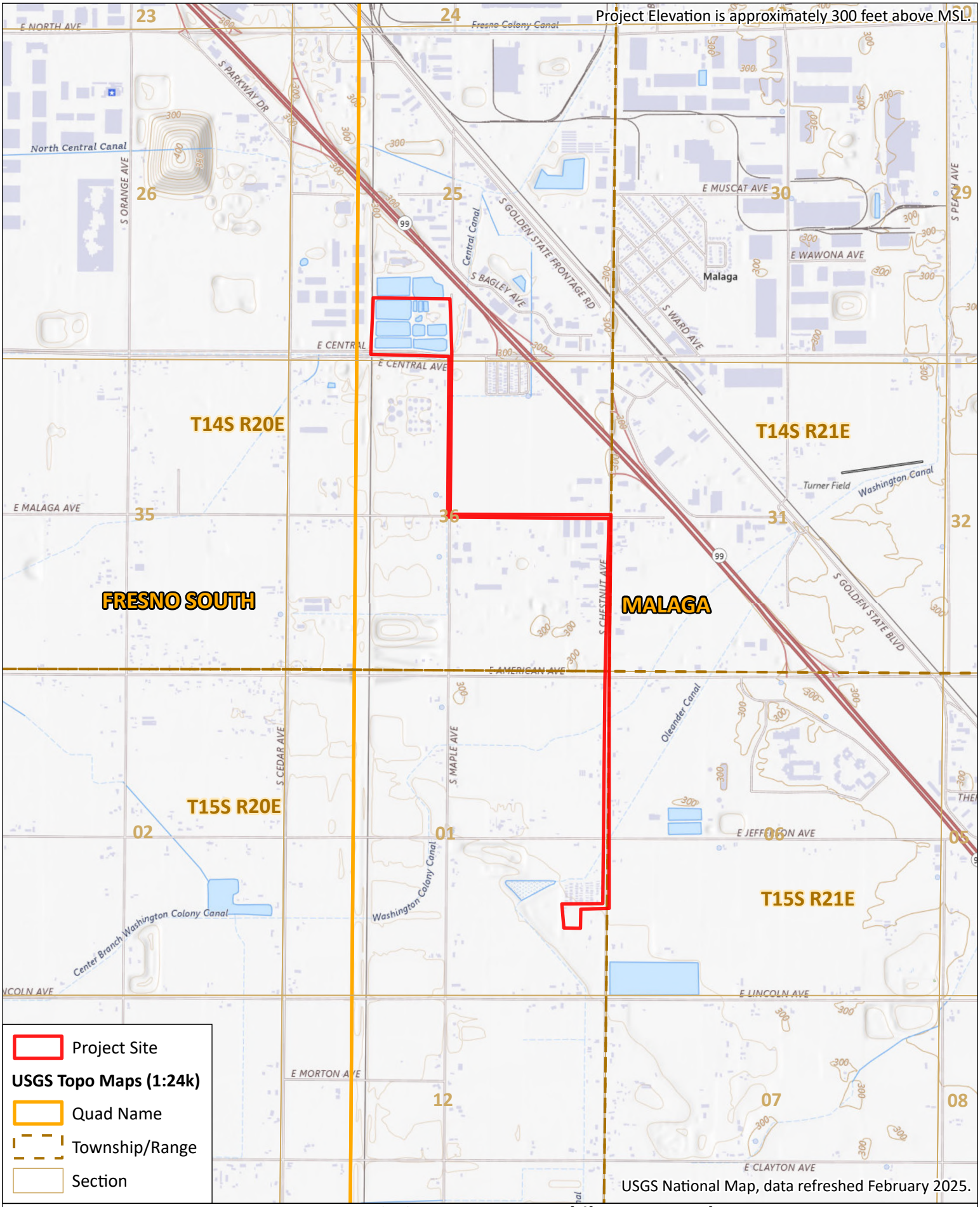

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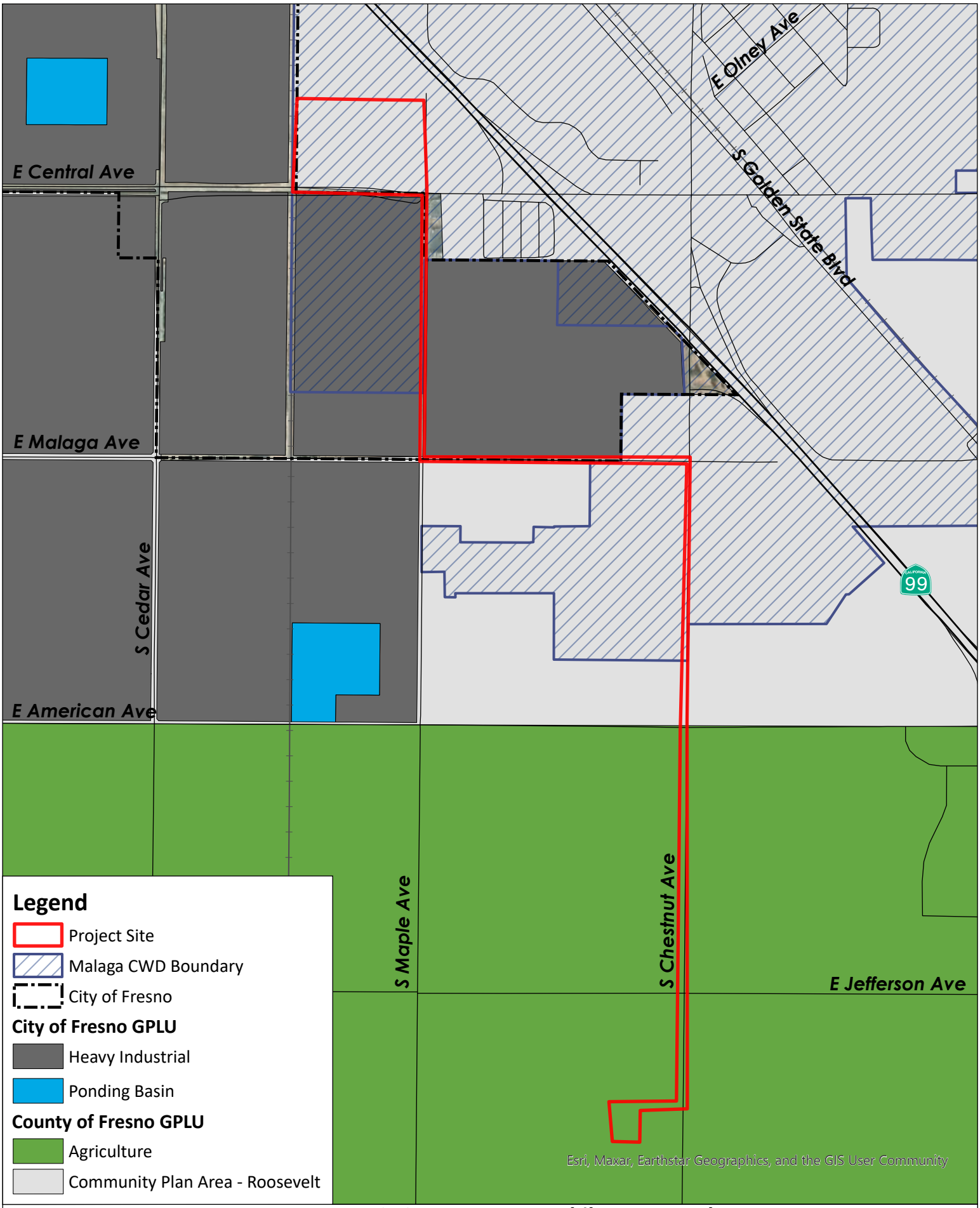

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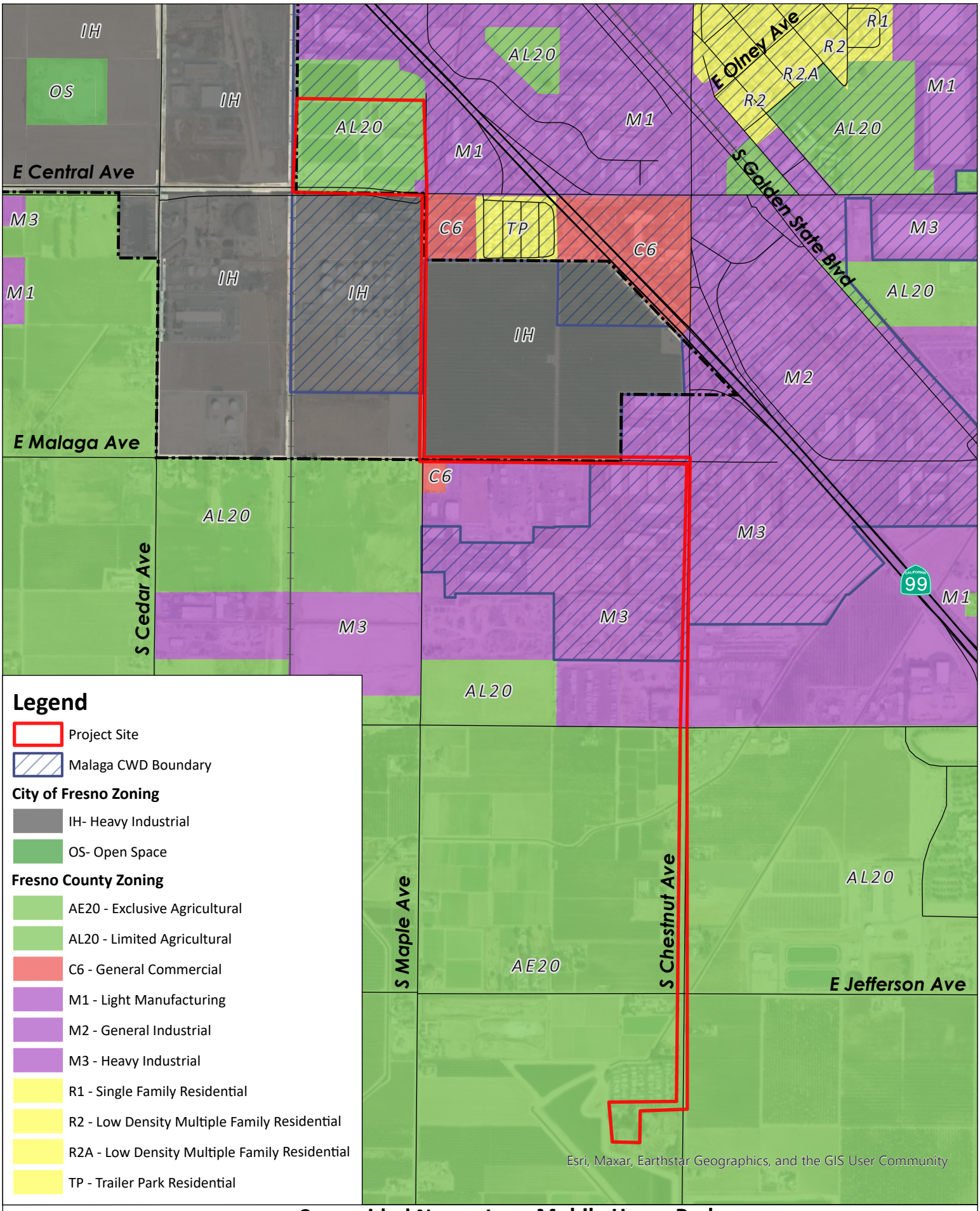

Legend

- Project Site
- Malaga CWD Boundary

City of Fresno Zoning

- IH- Heavy Industrial
- OS- Open Space

Fresno County Zoning

- AE20 - Exclusive Agricultural
- AL20 - Limited Agricultural
- C6 - General Commercial
- M1 - Light Manufacturing
- M2 - General Industrial
- M3 - Heavy Industrial
- R1 - Single Family Residential
- R2 - Low Density Multiple Family Residential
- R2A - Low Density Multiple Family Residential
- TP - Trailer Park Residential

0 0.1 0.2
Miles

Comunidad Nuevo Lago Mobile Home Park Sewer Consolidation Project

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CHAPTER 3 DETERMINATION

3.1 POTENTIAL ENVIRONMENTAL IMPACTS

As indicated by the discussions of existing and baseline conditions, and impact analyses that follow in this Chapter, environmental factors not checked below would have no impacts or less than significant impacts resulting from the project. Environmental factors that are checked below would have potentially significant impacts resulting from the project. Mitigation measures are recommended for each of the potentially significant impacts that would reduce the impact to less than significant.

☐ Aesthetics	☐ Agriculture and Forestry Resources	☐ Air Quality
☒ Biological Resources	☒ Cultural Resources	☐ Energy
☐ Geology/Soils	☐ Greenhouse Gas Emissions	☐ Hazards and Hazardous Materials
☐ Hydrology / Water Quality	☐ Land Use/Planning	☐ Mineral Resources
☐ Noise	☐ Population/Housing	☐ Public Services
☐ Recreation	☐ Transportation	☒ Tribal Cultural Resources
☐ Utilities and Service Systems	☐ Wildfire	☐ Mandatory Findings of Significance

The analyses of environmental impacts in Chapter 4 Impact Analysis result in an impact statement, which shall have the following meanings.

Potentially Significant Impact. This category is applicable if there is substantial evidence that an effect may be significant, and no feasible mitigation measures can be identified to reduce impacts to a less than significant level. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

Less than Significant with Mitigation Incorporated. This category applies where the incorporation of mitigation measures would reduce an effect from a "Potentially Significant Impact" to a "Less than Significant Impact." The lead agency must describe the mitigation measure(s), and briefly explain how they would reduce the effect to a less than significant level (mitigation measures from earlier analyses may be cross-referenced).

Less than Significant Impact.This category is identified when the proposed Project would result in impacts below the threshold of significance, and no mitigation measures are required.

No Impact. This category applies when a project would not create an impact in the specific environmental issue area. "No Impact" answers do not require a detailed explanation if they are adequately supported by the information sources cited by the lead agency, which show that the impact does not apply to the specific project (e.g. the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g. the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

3.2 DETERMINATION

On the basis of this initial evaluation (to be completed by the Lead Agency):

☐ 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 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL 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.

Signature

9/12/2025
Date

CHARLES E. GARABEDIAN JR., PRESIDENT
Printed Name/Position

CHAPTER 4 ENVIRONMENTAL IMPACT ANALYSIS

4.1 AESTHETICS

Table 4-1: Aesthetics Impacts

Except as provided in Public Resources Code Section 21099, would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Have substantial adverse effect on a scenic vista?	☐	☐	☐	☒
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☐	☒

4.1.1 BASELINE CONDITIONS

The Project is located in unincorporated Fresno County, south of the City of Fresno's city limits. While the Project is not in an incorporated area, the Project site is located in a rural area with little development. . The Project site covers the MCWD WWTF, the MHP, and the County ROW between the WWTF and the MHP. According to the Fresno County General Plan, there are no scenic vistas in the Project vicinity, nor is the site considered scenic. Furthermore, the Project site does not contain, or is not located near, a State scenic highway. The nearest state scenic highway is a portion State Route (SR) 180, which is located approximately 15 miles northeast.[1]

4.1.2 IMPACT ANALYSIS

a) Have substantial adverse effect on a scenic vista?

No Impact. There are no designated scenic vistas within proximity of the Project site. Project components would either be constructed underground and would not be visible or would be constructed at a lower elevation than the existing structures in the vicinity. Therefore, the Project would not obstruct existing public views. There would be no impact.

[1] (California Department of Transportation, 2023)

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

No Impact. There are no identified scenic resources, trees, rock outcroppings, or historic buildings on or near the Project site. In addition, there are no State scenic highways within the Project's vicinity as the nearest one is located approximately 15 miles away. Therefore, the Project would have no impact on scenic resources such as trees and rock outcroppings, historic buildings, or state scenic highways. There would be no impact.

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

Less than Significant Impact. The Project site is located just outside of the City of Fresno city limits within the County of Fresno. The County of Fresno is not considered an urban area; however, the City of Fresno is. The Project would be located in the un-zoned ROW, and areas located within residential and industrially zoned lands. The Project would not conflict with an applicable zoning designation as wastewater facilities are permitted within residentially zoned lands and un-zoned ROW. As mentioned in the above sections, no Project component would obstruct any scenic views or damage a scenic resource. The Project would not degrade the existing visual character as Project components would be located out of sight or attached to like-facilities once construction is complete. Therefore, impacts would be less than significant.

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

No Impact. The Project involves upgrades to the MCWD WWTF and a new wastewater pipeline. The Project would not include additional lighting. Lighting at the WWTF site is pre-existing and would remain. There would be no impact.

4.2 AGRICULTURE AND FORESTRY RESOURCES

Table 4-2: Agriculture and Forest Impacts

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
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))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
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?	☐	☐	☐	☒

4.2.1 BASELINE CONDITIONS

The Project site is located in area just outside of the City of Fresno city limits that predominantly contains industrial, rural, and agricultural development. The Project site is designated Farmland of Local Importance, Urban and Built-Up Land, and Rural Residential Land in the California Department of Conservation's (DOC) 2018 Farmland Mapping and Monitoring Program (see Figure 4-1). Lands are not subject to a Williamson Act contract.

4.2.2 IMPACT ANALYSIS

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?

No Impact. No portion of the Project site is designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. There are areas with such designation surrounding Project work areas; however, no aspect of the Project would impact said areas. As such, the Project would not involve the conversion of Farmland to non-agricultural use. Therefore, there would be no impact.

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

No Impact. The Project site is zoned and planned for industrial uses. While there are surrounding areas zoned and planned for agricultural uses, the Project would not impact these areas. Furthermore, Project lands are not subject to a Williamson Act contract. There would be no impact.

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))?

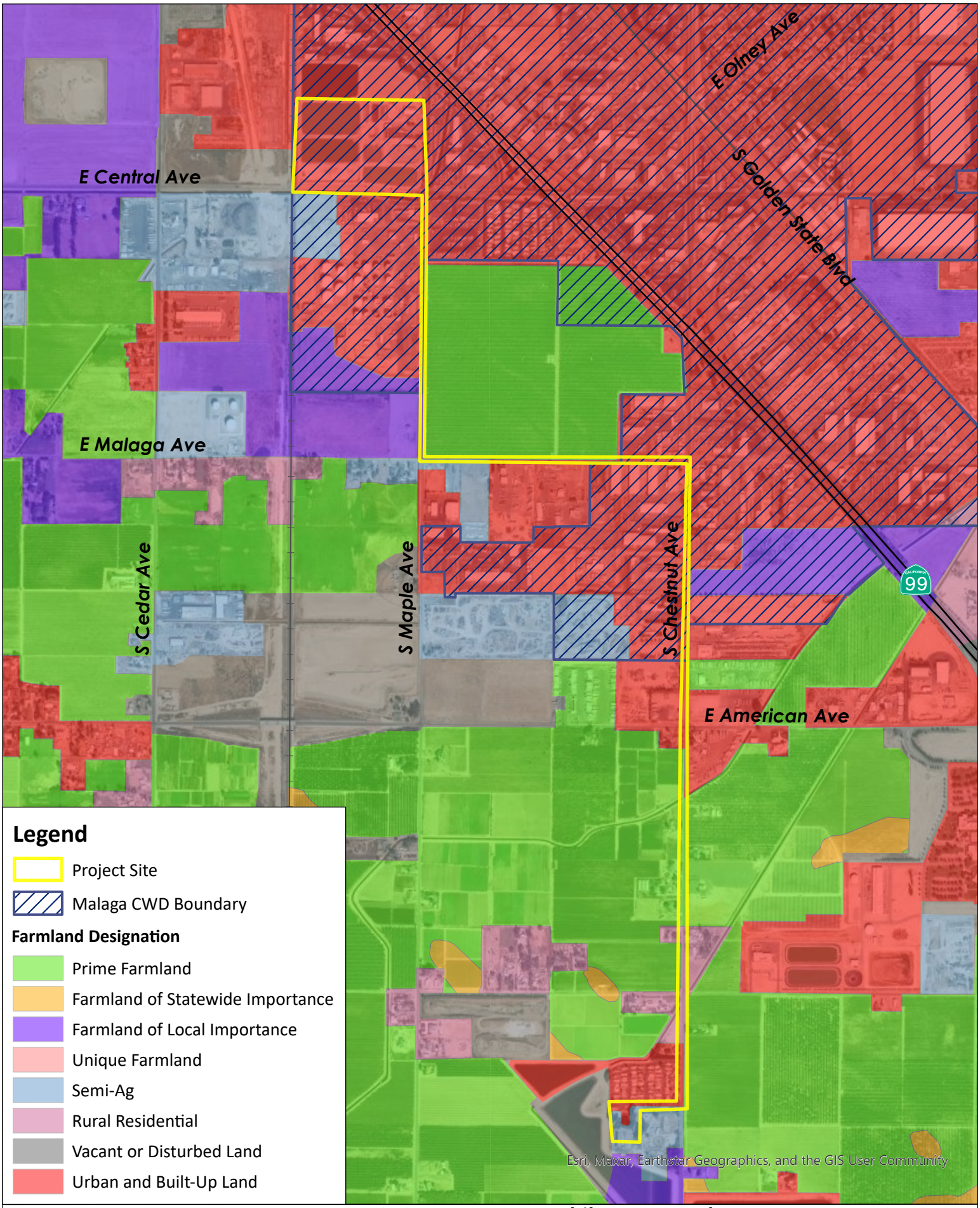
No Impact. The Project site is not within the vicinity of a forest (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g)). The Project area does not include any land used or designated for timber, forest land, or timber harvesting industry. The Project is not located in an area of the County that contains forest land. Therefore, the Project would not conflict with existing zoning for or cause rezoning of forest land. There would be no impact.

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

No Impact. As discussed above, the Project is not within the vicinity of a forest 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)). Therefore, the Project would not result in the loss of forest land to non-forest use. There would be no impact.

e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

No Impact. The Project would construct wastewater infrastructure in existing ROW and at an existing WWTF. The Project would not involve additional changes to the existing environment that would lead to conversion of farmlands to non-agricultural uses as there are none within the Project site. Furthermore, the Project would not convert forest lands to non-forest uses. Therefore, there would be no impact.



Comunidad Nuevo Lago Mobile Home Park
Sewer Consolidation Project

PROVOST& PRITCHARD

4.3 AIR QUALITY

Table 4-3: Air Quality Impacts

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☐	☒
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

4.3.1 BASELINE CONDITIONS

The Project site is located within the boundaries of the San Joaquin Valley Air Pollution Control District (SJVAPCD) and the San Joaquin Valley Air Basin (SJVAB). The SJVAB is positioned within the San Joaquin Valley of California. The San Joaquin Valley is bounded by the Sierra Nevada Mountain Range to the east and the Coastal Mountain Range to the west. Wind within the SJVAB typically channels south-southwest during the summer months, while wind flows to the north-northwest during the winter months. Wind velocity for the region is considered low for an area of such size.[2] Due to a lack of strong wind and the natural confinement of the mountain ranges surrounding the SJVAB, the region experiences some of the worst air quality in the world.

4.3.1.1 REGULATORY ATTAINMENT DESIGNATIONS

Under the California Clean Air Act (CCAA), the California Air Resources Board (CARB) is required to designate areas of the State as attainment, nonattainment, or unclassified with respect to applicable standards. An "attainment" designation for an area signifies that pollutant concentrations did not violate the applicable standard in that area. A "nonattainment" designation indicates that a pollutant concentration violated the applicable standard at least once, excluding those occasions when a violation was caused by an exceptional event, as defined in the criteria. Depending on the frequency and severity of pollutants exceeding applicable standards, the nonattainment designation can be further classified as serious nonattainment, severe nonattainment, or extreme nonattainment, with extreme nonattainment being the most severe of the classifications. An "unclassified" designation signifies that the data does not support either an attainment or nonattainment designation. The CCAA divides districts into moderate, serious, and severe air pollution categories, with increasingly stringent control requirements mandated for each category. The United States Environmental Protection Agency (USEPA) designates areas for ozone, carbon monoxide (CO), and nitrogen dioxide (NO_2) as "does not meet the primary standards," "cannot be classified," or "better than national standards." For sulfur dioxide (SO_2), areas are designated as "does not meet the primary standards," "does not meet the secondary standards," "cannot be classified," or "better than national standards." However, the CARB terminology of attainment, nonattainment, and unclassified is

[2] (San Joaquin Valley Air Pollution Control District, 2012)

more frequently used. The USEPA uses the same sub-categories for nonattainment status: serious, severe, and extreme. In 1991, USEPA assigned new nonattainment designations to areas that had previously been classified as Group I, II, or III for particulate matter 10 microns in size (PM_{10}) based on the likelihood that they would violate national PM_{10} standards. All other areas are designated "unclassified."

Table 4-4: Summary of Ambient Air Quality Standards and Attainment Designation

Pollutant	Averaging Time	State Standard	Federal Standard	State Attainment Status	Federal Attainment Status
O_3	1 hour	0.09 ppm	N/A	Nonattainment/ Severe	N/A
O_3	8 hours	0.070 ppm	0.070 ppm (4th highest in 3 years)	Nonattainment	Nonattainment/ Extreme
CO	1 hour	20 ppm	35 ppm	Attainment/ Unclassified	Attainment/ Unclassified
CO	8 hours	9.0 ppm	9 ppm	Attainment/ Unclassified	Attainment/ Unclassified
PM_{10}	24 hours	50 µg/m^3	150 µg/m^3 (expected number of days above standard < or equal to 1)	Nonattainment	Attainment
PM_{10}	Annual	20 µg/m^3	N/A	Nonattainment	N/A
$PM_{2.5}$	24 hours	N/A	35 µg/m^3	N/A	Nonattainment
$PM_{2.5}$	Annual	12 µg/m^3	12.0 µg/m^3	Nonattainment	Nonattainment
NO_2	1 hour	0.18 ppm	0.100 ppm	Attainment	Attainment/ Unclassified
NO_2	Annual	0.030 ppm	0.053 ppm	Attainment	Attainment/ Unclassified
SO_2	1 hour	0.25 ppm	0.075 ppm (99th percentile over 3 years)	Attainment	Attainment/ Unclassified
SO_2	3 hours	N/A	0.5 ppm	N/A	Attainment/ Unclassified
SO_2	24 hours	0.04 ppm	0.14 ppm	Attainment	Attainment/ Unclassified
SO_2	Annual	N/A	0.030 ppm	N/A	Attainment/ Unclassified
Pb	Monthly	1.5 µg/m^3	N/A	Attainment	N/A
Pb	Rolling 3-month average	N/A	0.15 µg/m^3	N/A	Attainment/ Unclassified
Sulfates	24 hours	25 µg/m^3	N/A	Attainment	N/A
H_2S	1 hour	0.03 ppm	N/A	Unclassified	N/A
Visibility Reducing Particles (VRP)	8 hours	Visibility of 10 miles or more at relative humidity less than 70 %	N/A	Unclassified	N/A
Vinyl Chloride	24 hours	0.01 ppm	N/A	Attainment	N/A

** For more information on standards visit: https://ww3.arb.ca.gov/research/aaqs/aaqs2.pdf*
*** No Federal 1-hour standard. Reclassified extreme nonattainment for the Federal 8-hour standard [2024].*
****Secondary Standard*

4.3.1.1.1 CONSTRUCTION-GENERATED EMISSIONS

Construction of the Project is assumed to be completed over the course of 24 months. Emissions associated with the proposed Project were calculated using California Emissions Estimator Modeling (software) (CalEEMod), Version 2022.1.1.29. The emissions modeling includes emissions generated by off-road equipment and haul trucks. All other assumptions are based upon the default parameters contained in the model. Localized air quality impacts associated with operations of the Project would be minor and were qualitatively assessed. Modeling assumptions and output files are included in Appendix A.

4.3.1.2 THRESHOLDS OF SIGNIFICANCE

Air pollutant emissions have regional effects and localized effects. This analysis assesses the regional effects of the Project's criteria pollutant emissions in comparison to SJVAPCD thresholds of significance for short-term construction activities and long-term operation of the Project. Localized emissions from Project construction and operation are also assessed using concentration-based thresholds that determine if the Project would result in a localized exceedance of any ambient air quality standards or would make a cumulatively considerable contribution to an existing exceedance. The primary pollutants of concern during Project construction and operation are ROG (reactive organic gases), NO_X, PM_{10}, and $PM_{2.5}$. The SJVAPCD Guide for Assessing and Mitigating Air Quality Impacts (GAMAQI) adopted in 2015 contains thresholds for ROG and Nitrogen Oxides (NO_X); Sulfur Oxides (SO_X), CO, PM_{10}, and $PM_{2.5}$. Ozone is a secondary pollutant that can be formed miles away from the source of emissions through reactions of ROG and NO_X emissions in the presence of sunlight. Therefore, ROG and NO_X are termed ozone precursors. The SJVAB often exceeds the State and national ozone standards. Therefore, if the Project emits a substantial quantity of ozone precursors, the Project may contribute to an exceedance of the ozone standard. The SJVAB also exceeds air quality standards for PM_{10}, and $PM_{2.5}$; therefore, substantial Project emissions may contribute to an exceedance for these pollutants.

The SJVAPCD adopted significance thresholds for construction-related and operational-related ROG, NO_X, PM_{10}, $PM_{2.5}$, CO, and SO_X, these thresholds are included in Table 4-5.

Table 4-5: Project-Level Air Quality CEQA Thresholds of Significance

Pollutant	Significance Threshold	
	Construction Emissions (tons/year)	Operational Emissions (tons/year)
CO	100	100
NO_X	10	10
ROG	10	10
SO_X	27	27
PM_{10}	15	15
$PM_{2.5}$	15	15
Source: SJVAPCD. 2015. Guidance for Assessing and Mitigating Air Quality Impacts. Website: https://ww2.valleyair.org/media/g4nl3p0g/gamaqi.pdf. Accessed July 16, 2025.		

4.3.2 IMPACT ANALYSIS

4.3.2.1 CONSTRUCTION-GENERATED EMISSIONS

Estimated construction-generated emissions are summarized in Table 4-6. Long-term operational emissions would be negligible and would not exceed any set threshold governing air quality emission generation within the SJVAPCD.

Table 4-6: Unmitigated Short-Term Construction Generated Emissions of Criteria Air Pollutants

Source	Annual Emissions (TPY[1])					
	ROG	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Maximum Annual Project Construction Emissions	0.31	1.44	1.78	<0.005	0.09	0.07
SJVAPCD Threshold	*10*	*10*	*100*	*27*	*15*	*15*
Threshold Exceeded?	No	No	No	No	No	No
[1]TPY – Tons per Year						

4.3.2.2 MAXIMUM DAILY EMISSIONS OF CRITERIA AIR POLLUTANTS

Daily construction emissions generated by the Project are summarized in Table 4-7.

Table 4-7: Maximum Daily Emissions of Criteria Air Pollutants

Source	Daily Emissions Maximum (in pounds)					
	ROG	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Construction – Summer	3.02	10.6	13.5	0.02	0.42	0.37
Construction – Winter	9.20	15.7	18.7	0.03	7.82	4.05
SJVAPCD SJVAB Threshold	*100*	*100*	*100*	*100*	*100*	*100*
Threshold Exceeded?	No	No	No	No	No	No

a) Would the project conflict with or obstruct implementation of the applicable air quality plan?

No Impact. The Project would not conflict with or obstruct implementation of any applicable air quality plan. The Project would not exceed any threshold for air quality emissions that have been set by the SJVAPCD. Therefore, there would be no impact.

b) 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?

Less than Significant Impact. The Project would result in the construction of a new lift station at the MHP, a new force main from the MHP to the MCWD, and a gravity sewer main to the existing MCWD sewer collection system. There would not be a cumulatively considerable net increase of any criteria pollutant for which the Project region is in non-attainment. As shown in Table 4-6 and Table 4-7, the Project would not exceed an emissions threshold which has been set by the SJVAPCD for construction related emissions. The Project would result in negligible quantities of operational emissions as compared to existing conditions. Therefore, impacts would be less than significant.

c) Would the project expose sensitive receptors to substantial pollutant concentrations?

Less than Significant Impact. The Project would not expose sensitive receptors to substantial pollutant concentrations. Sensitive Receptors are groups that would be more affected by air, noise, and light pollution, pesticides, and other toxic chemicals than others. This includes infants, children under 16, elderly over 65, athletes, and people with cardiovascular and respiratory diseases. High concentrations of these groups would include daycares, residential areas, hospitals, elder care facilities, schools and parks. The Project would result in the construction of a new lift station at the MHP and new mains connecting the MHP to MCWD. The temporary nature of construction generated emissions and the fact that construction would move throughout the site makes it unlikely that a significant impact would result from the proposed Project. Additionally, the Project would not result in construction or operational emissions that would result in an exceedance of a set threshold.

However, due to the on-site and nearby sensitive receptors to the Project site, AERMOD (Version 24142) and the HARP2 air dispersion model (Version 22.118) were also run for the Project site to show the health risk the Project would have on sensitive receptors in the area. The exposure period to diesel particulate matter, whose amount was taken (averaged annually for the two years of construction) from the PM_{10} exhaust emissions found in the CalEEMod results, was set to the estimated construction period. No time away from home was modeled to ensure worst-case scenario. The model run, which can be viewed in Appendix A, indicates that the Project would result in a cancer risk of 4.88 in one million, which is less than the SJVAPCD's threshold of 20 in one million. The Project would also present a chronic hazard index

of 0.003, which would be less than the SJVAPCD's threshold of one. There are no acute impacts from diesel particulate matter, so the hazard index would be zero. Therefore, impacts would be less than significant.

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

Less than Significant Impact. During construction activities, construction equipment exhaust, and other construction applications, odors would temporarily be emitted. Construction would have a temporary effect on some rural residences which would be located near the construction area of the Project. Construction of the Project would be temporary, and odors from construction would not remain after Project completion. Furthermore, as the Project is proposing new equipment at the WWTF that would ultimately improve the efficacy of the system, the Project would directly prevent objectionable odors that may occur from the existing deteriorating equipment. Therefore, impacts would be less than significant.

4.4 BIOLOGICAL RESOURCES

Table 4-8: Biological Resources Impacts

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
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?	☐	☐	☐	☒
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☒	☐	☐
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?	☐	☐	☒	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒
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?	☐	☐	☐	☒

4.4.1 BASELINE CONDITIONS

4.4.1.1 GENERAL

The Project site is located approximately one mile south of MCWD on the west side of Chestnut Avenue between Jefferson and Lincoln Avenues as well as the northwest corner of Central and Maple Avenues. The Project site is located within the *Malaga* U.S. Geological Survey (USGS) 7.5-minute quadrangle within the western edge of Section 1, 25, and 36, Township 14 and 15 South, Range 20 East. The topography of the Project site is approximately 300 feet above mean sea level and relatively flat with the depressions from the treatment ponds ranging from 285-300 feet above mean sea level.

Like most of California, the Project site experiences a Mediterranean climate. Warm, dry summers are followed by cool, moist winters. In the summer, average high temperatures range between 100- and 105-degrees Fahrenheit (°F), but do not often exceed 110 °F, and the humidity is generally low. Winter temperatures are often below 60 °F during the day and rarely exceed 70 °F. On average, the City of Fresno receives approximately 10 inches of precipitation in the form of rain yearly, most of which occurs between December and April, and the Project site would be expected to receive similar amounts of precipitation.[3]

A Biological Resources Evaluation report, dated May 2025, was prepared for the Project and can be found in this document as Appendix B. A reconnaissance-level field survey of the Project site was conducted on May 5, 2025, by a Provost & Pritchard biologist. The survey consisted of walking and driving throughout the Project site and visually surveying areas outside of the Project site within a 40-foot buffer. The survey allowed the biologist to identify and note land uses, biological habitats and communities, and plant and animal species that were encountered. Habitats were also assessed to help with determining if they could be suitable for various rare or protected plant and animal species.

4.4.1.2 SOILS

Nine soil mapping units representing five soil types were identified within the Project site and are listed in Table 4-9 (see Appendix D of Appendix B for the Web Soil Survey Report). The soils are displayed with their core properties in the table below, according to the Major Land Resource Area of California. All ten soils are primarily used for grazing, wildlife habitat, and watershed areas.

Table 4-9: List of Soils Located on the Project Site and Their Basic Properties

Soil	Soil Map Unit	Percent of Project Site	Hydric Soil Category	Drainage	Permeability	Runoff
Delhi	Loamy sand, 0 to 3 percent slopes	3.5%	Predominantly Nonhydric	Somewhat excessively drained	High to very high	Very low
	Loamy sand, 3 to 9 percent slopes	2.0%	Nonhydric	Somewhat excessively drained	High to very high	Very low
Dello	Loamy sand	3.5%	Predominantly Hydric	Somewhat poorly drained	High to very high	Very low
Hanford	Sandy loam	2.7%	Nonhydric	Well drained	High	Very low
	Fine sandy loam	3.8%	Predominantly Nonhydric	Well drained	High	Very low
Hesperia	Sandy loam, very deep	9.1%	Nonhydric	Well drained	Moderately low	Negligible
	Fine sandy loam, very deep	27.6%	Nonhydric	Well drained	Moderately low	Negligible
	Fine sandy loam,	5.2%	Nonhydric	Well drained	Moderately low	Negligible

[3] (The National Oceanic and Atmospheric Administration, 2025).

Soil	Soil Map Unit	Percent of Project Site	Hydric Soil Category	Drainage	Permeability	Runoff
	deep, saline-sodic					
Miscellaneous water	-	42.6%	-	-	-	-

Hydric soils are defined as soils that are saturated, flooded, or ponded long enough during the growing season to develop anaerobic conditions such that under sufficiently wet conditions, hydrophytic vegetation can be supported. Hydric soil ratings are derived from specific soil properties as well as climate, parent material, vegetation, landform type, and biological activity of a certain location. Seven of the major soil mapping units are nonhydric or predominantly nonhydric and make up 39.4% of the site. Water identified on the site is within the WWTF and makes up 54.0% of the site.

4.4.1.3 BIOTIC HABITATS

Seven biotic habitats were observed within the Project site and included agriculture, canal, non-native grassland, pastureland, residential, ruderal, and treatment ponds (see Figure 4-2 and Figure 4-3). These habitats and their constituent plant and animal species are described in more detail in the following sections.

4.4.1.3.1 AGRICULTURE

The Project site contained active agricultural habitat which included orchards along Maple Avenue, Malaga Avenue, and Chestnut Avenue. Wildlife species observed in this habitat included European starlings (*Sturnus vulgaris*) and red-winged blackbirds (*Agelaius phoeniceus*). The orchards offer foraging opportunities for a wide variety of wildlife including insects, passerines, and small mammals, which in turn offer larger, predatory species prey to hunt.

4.4.1.3.2 CANAL

The canal habitat included three canals, one to the north along the southern boundary of the WWTF called Central Canal and two to the south that run across South Chestnut Avenue called Washington Colony Canal and Oleander Canal. Vegetation was scarce along most of the canals but included mulefat (*Baccharis salicifolia*), scouring rush (*Equisetum hyemale*), and grasses. None of the canals within the Project site drain to jurisdictional water. An individual killdeer (*Charadrius vociferus*) was identified on the bank at Oleander Canal. No nesting behavior was observed. While all three canals had flowing water during the survey, all three canals become dry during spring (notably March and April) and fall (August through November) due to regulation of flows, as identified by aerial imagery. The canals likely act as a corridor for terrestrial wildlife such as mammals, reptiles, and vertebrates when dry. Birds, bats, rodents, larger mammals, invertebrates, and reptiles likely use this as a water source when water is present.

4.4.1.3.3 PASTURELAND

Pastureland habitat within the Project site is located along the southeast edge of the MHP at a defunct horse stable. The Project site is dominated by somewhat-maintained annual grasslands composed of slender wild oat (*Avena barbata*), bromes (*Bromus* spp.), Mediterranean grass (*Schismus barbatus*), and Bermuda grass (*Cynodon dactylon*) with Eucalyptus trees (*Eucalyptus deglupta*) lining the boundaries.

The survey of the Project site resulted in the identification of numerus bird species including European starlings and Eurasian collared doves (*Streptopelia decaocto*), both observed foraging in this habitat. California ground squirrels (*Otospermophilus beecheyi*) and their burrows were observed throughout this

habitat. Dried horse (*Equus ferus caballus*) scat was observed in the abandoned gated pastures. This portion of the Project site serves a wide range of foraging birds during the day and coyotes and other nocturnal animals at night.

4.4.1.3.4 NON-NATIVE GRASSLAND

The non-native grassland habitat within the Project site is located adjacent to the two southern-most treatment ponds at the MHP as well as the fallow fields along South Chestnut Avenue surrounded by active cropland, residential areas, and businesses. The Project site was densely vegetated within this habitat type and composed of short-pod mustard (*Hirschfeldia incana*), mulefat, wild radish (*Raphanus raphanistrum*), rigid fiddleneck (*Amsinckia menziesii*), goosefoot (*Chenopodium album*), Bermuda grass, puncturevine (*Tribulus terrestris*), prostrate pigweed (*Amaranthus blitoides*), prickly lettuce (*Lactuca serriola*), common groundsel (*Senecio vulgaris*), and a variety of barleys (*Hordeum* spp.) and bromes (*Bromus* spp.).

The survey of this habitat did not result in any new wildlife species observations. The non-native grassland habitat within the Project site is severely disturbed from past use but provides densely vegetated habitat to a variety of wildlife year-round. The non-native grassland within the Project site, like the previously mentioned pastureland habitat, serves a variety of predatory wildlife but due to the denser vegetation, also offers cover and foraging for prey species such as small rodents, reptiles, and other bird species.

4.4.1.3.5 PONDS

The ponds were found in both the MHP and WWTF. At the MHP, there were three distinct ponds, two of which contained water during the survey. The MHP ponds had Eucalyptus trees lining the boundary adjacent to the previously noted pastureland habitat. California ground squirrels were active along these ponds and had burrows dug along the banks. An unattended bird nest was observed on the ground below a Eucalyptus tree near the northern-most pond. The northern MHP pond had red-eared sliders (*Trachemys scripta elegans*) and dragonflies (*Anisoptera*) present.

At the WWTF, ten ponds[4] were within the Project site but only one had water present. The vegetation growing within the dry WWTF ponds included European heliotrope (*Heliotropium europaeum*), small melilot (*Melilotus indicus*), and cheeseweed mallow (*Malva neglecta*). At the one active pond, American coots (*Fulica americana*), black-neck stilts (*Himantopus himantopus mexicanus*), mallards (*Anas platyrhynchos*), a snowy egret (*Egretta thula*), and Canada geese (*Branta canadensis*) with goslings were observed. An unattended Canada goose nest was observed along the southern edge of the active pond.

While the mapped ponds were heavily disturbed from the surrounding areas, all the ponds with water were being used as water sources, nesting/ burrowing habitat, and foraging habitat for a wide variety of wildlife including birds, invertebrates, and small mammals.

4.4.1.3.6 RESIDENTIAL

The residential portion of the Project site contains houses and paved roads/ sidewalks. Vegetation in this section of the Project site included ornamental plants and a variety of grasses surrounding houses. The survey of this habitat did not result in any new wildlife species observations.

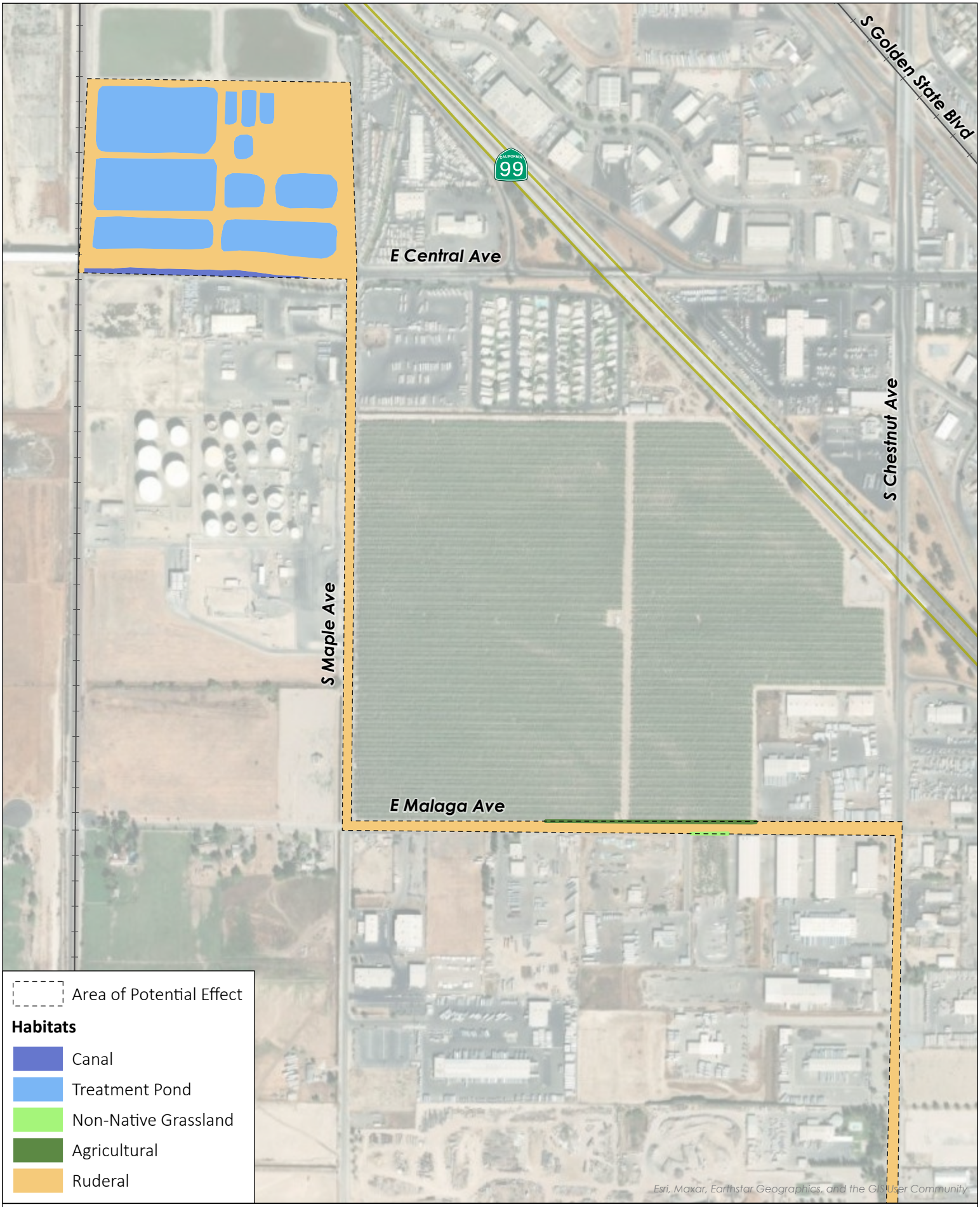
4.4.1.3.7 RUDERAL

The ruderal habitat of the site contained MHP (excluding the residential area, pastureland, non-native grassland, and treatment ponds), WWTF (excluding the treatment ponds), paved roads, and dirt access roads throughout the Project site. Vegetation in this section of the site was dominated by a wide variety of

[4] At the WWTF site, six of these are effluent disposal ponds, three are sludge drying beds, and one is a storm drainage basin.

grasses. Eucalyptus trees, multiple Northern California black walnut trees (*Juglans hindsii*), and bottlebrush trees (*Callistemon* sp.) were primarily found at the MHP. The vegetation identified within the ruderal habitat of the Project site include slender wild oat, common Mediterranean grass, Bermuda grass, prostrate pigweed, narrowleaf milkweed (*Asclepias fascicularis*), short-pod mustard, rabbit's-foot grass (*Polypogon monspeliensis*), longbeak stork's bill (*Erodium botrys*), wall barley (*Hordeum murinum*), common groundsel, upright pepperweed (*Lepidium strictum*), telegraph weed (*Heterotheca grandiflora*), shepherd's purse (*Capsella bursa-pastoris*), dwarf nettle (*Urtica urens*), sacred datura (*Datura wrightii*), common soft brome (*Bromus hordeaceus*), burr clover (*Medicago polymorpha*), curly dock (*Rumex crispus*), common horehound (*Marrubium vulgare*), matted sandmat (*Euphorbia serpens*), rescuegrass (*Bromus catharticus*), Russian thistle (*Salsola tragus*), common spikeweed (*Centromadia pungens*), ripgut brome (*Bromus diandrus*), and Italian thistle (*Carduus pycnocephalus*).

Surveying this habitat type within the Project site resulted in the identification of numerus bird species including American crow (*Corvus brachyrhynchos*), American kestrel (*Falco sparverius*), black phoebe (*Sayornis nigricans*), California scrub-jay (*Aphelocoma californica*), European starling, Eurasian collar dove, house finch (*Haemorhous mexicanus*), house sparrow (*Passer domesticus*), killdeer, mourning dove (*Zenaida macroura*), northern mockingbird (*Mimus polyglottos*), red-tailed hawk (*Buteo jamaicensis*), and rock pigeon (*Columba livia*). Invertebrates observed in this habitat included Asian lady beetle (*Harmonia axyridis*), June beetle (*Cotinis nitida*), and unidentified bees (Anthophila). A highly-decomposed snake carcass was observed adjacent to a paved road in the southern section of the MHP and, based on a small fragment of skin with scales, was identified as a juvenile Pacific gopher snake (*Pituophis catenifer catenifer*). At the WWTF, coyote (*Canis latrans*) scat and tracks were observed on the access roads along the southern boundary of the WWTF and adjacent to Central Canal. Unattended domestic dogs (*Canis lupus familiaris*) have been seen around the facility according to an employee, but no individuals, scat, or tracks were observed during the survey.



North Habitats Map

Comunidad Nuevo Lago Mobile Home Park

PROVOST& PRITCHARD



South Habitats Map
Comunidad Nuevo Lago Mobile Home Park

PROVOST& PRITCHARD

4.4.1.4 NATURAL COMMUNITIES OF SPECIAL CONCERN AND RIPARIAN HABITAT

Natural communities of special concern are those that are of limited distribution, distinguished by significant biological diversity, or home to special status species. California Department of Fish and Wildlife (CDFW) has classified and mapped all natural communities in California. Just as the special status plant and animal species (see Section 2.6), these natural communities of special concern can be found within the California Natural Diversity Database (CNDDB). There are no recorded observations of a natural community of special concern mapped within the site and no natural communities of special concern were observed during the field survey.

Riparian habitat is composed of plant communities that occur along the banks, and sometimes over the banks, of most waterways and is an important habitat for numerous wildlife species. CDFW has jurisdiction over most riparian habitat in California. All three canals present within the Project site were manmade and offered no riparian habitat for wildlife to utilize. No impacts are anticipated to the canals within the Project site.

4.4.1.5 DESIGNATED CRITICAL HABITAT

The United States Fish and Wildlife Service (USFWS) often designates areas of "critical habitat" when it lists species as threatened or endangered. Critical habitat is a specific geographic area that contains features essential for the conservation of a threatened or endangered species, which may require special management and protection. According to the IPaC, designated critical habitat is absent from the Project site and vicinity.

4.4.1.6 WILDLIFE MOVEMENT CORRIDORS AND NATIVE WILDLIFE NURSERY SITES

Wildlife movement corridors are routes that animals regularly and predictably follow during seasonal migration, dispersal from native ranges, daily travel within home ranges, and inter-population movements. Movement corridors in California are typically associated with valleys, ridgelines, rivers, and creeks supporting riparian vegetation. The canal habitat could potentially act as a corridor for terrestrial wildlife during the dry season and aquatic species when water is present, however, the surrounding area is highly disturbed and would discourage use of the canal for dispersal activities.

Native wildlife nursery sites are areas where a species or group of similar species raise their young in a concentrated place, such as maternity bat roosts. The Eucalyptus trees located within the Project site could function as native wildlife nursery sites for birds. The active treatment pond at the WWTF was being used as wildlife nursery sites for waterfowl species which were observed during the survey.

4.4.1.7 SPECIAL STATUS PLANTS AND ANIMALS

A query of the CNDDB for occurrences of special status plant and animal species was conducted for the *Malaga* USGS 7.5-minute quadrangles that contains the Project site, and for the eight surrounding USGS quadrangles: *Fresno North*, *Clovis*, *Round Mountain*, *Fresno South*, *Sanger*, *Caruthers*, *Conejo*, and *Selma*. A query of the IPaC was also completed for the Project site. These species, and their potential to occur within the Project site, are listed in Table 4-10 and Table 4-11, below. Other special status species that did not show up in the CNDDB query, but have the potential to occur in the vicinity, are also included in Table 4-11. Species lists obtained from CNDDB and IPaC are available in Appendix B.

Table 4-10: List of Special Status Plants with Potential to Occur on the Project Site and/or in the Vicinity

Species	Status*	Habitat	Occurrence within the Project Site
Alkali-sink goldfields (*Lasthenia chrysantha*)	CNPS 1B	Found in vernal pool and wet saline flat habitats in the San Joaquin Valley region at elevations below 700 feet. Blooms February – April.	**Absent.** The Project site does not provide suitable vernal pool habitat to support this species.
Bristly sedge (*Carex comosa*)	CNPS 2B	Found in marshes, swamps, coastal prairies, and valley and foothill grasslands, often along lake margins and wet areas at elevations between -16 and 3,310 feet. Areas below sea level occur on a Delta Island. Blooms July – September.	**Unlikely.** The treatment ponds and the canals within the Project site could provide the wetted areas needed for this species, but the surrounding area is highly disturbed by active cropland, residential areas, and industrial facilities. This species was not observed during the survey or within the vicinity. The nearest recorded observation of this species within the vicinity was approximately 11.5 miles east of the Project site in 1989.
California jewelflower (*Caulanthus californicus*)	FE, CE, CNPS 1B	Found in the San Joaquin Valley and western Transverse Ranges in sandy soils. Occurs on flats and slopes, generally in non-alkaline grassland at elevations between 200 and 6,100 feet. Blooms February – April.	**Absent.** CNDDB lists this species as "extirpated" from the region.
California satintail (*Imperata brevifolia*)	CNPS 2B	Often found in wet springs, meadows, streambanks, and floodplains, and can also be found in coastal scrub, riparian scrub, Mojavean desert scrub, chaparral, and alkali seeps at elevations below 1,600 feet. Blooms September – May.	**Absent.** The Project site does not provide suitable aquatic habitat to support this species.
Forked hare-leaf (*Lagophylla dichotoma*)	CNPS 1B	Found in cismontane woodland, and valley and foothill grassland communities at elevations between 600 and 1,100 feet. Blooms April – May.	**Absent.** The Project site does not provide suitable habitat and is outside the elevational range of this species.
Greene's tuctoria (*Tuctoria greenei*)	FE, CNPS 1B	Found in the San Joaquin Valley and other parts of California in vernal pools within valley grassland, wetland, and riparian communities at elevations below 3,500 feet. Blooms May – September.	**Absent.** The Project site does not provide suitable vernal pool habitat to support this species.
Madera leptosiphon (*Leptosiphon serrulatus*)	CNPS 1B	Found within openings of foothill woodland, often yellow-pine forest, and chaparral at elevations between 1,000 and 4,300 feet. Blooms April – May.	**Absent.** The Project site does not provide suitable habitat and and is outside the elevational range of this species.
San Joaquin adobe sunburst (*Pseudobahia peirsonii*)	FT, CE, CNPS 1B	Found in the San Joaquin Valley and the Sierra Nevada foothills in bare, dark, clay soils in valley and foothill grassland and cismontane woodland communities at elevations between 300 and 3,000 feet. Blooms March – May.	**Absent.** Soils within the Project site are not suitable for this species.

Species	Status*	Habitat	Occurrence within the Project Site
San Joaquin Valley Orcutt grass (*Orcuttia inaequalis*)	FT, CE, CNPS 1B	Found in the eastern San Joaquin Valley and the Sierra Nevada foothills in vernal pools within valley grassland, freshwater wetland, and wetland-riparian communities at elevations below 2,600 feet. Blooms April – September.	**Absent.** The Project site does not provide suitable vernal pool habitat to support this species.
Sanford's arrowhead (*Sagittaria sanfordii*)	CNPS 1B	This species is an aquatic plant and is found in the San Joaquin Valley and other parts of California in freshwater marshes, ponds, canals, and ditches at elevations below 1,000 feet. Blooms May – October.	**Unlikely.** While the treatment ponds could offer possible aquatic habitat for this species, surrounding areas are highly disturbed, especially the active cropland, residential areas, and ruderal habitat. The nearest recorded observation of this species within the vicinity was approximately 8.6 miles south of the Project site in 1993.
Spiny-sepaled button-celery (*Eryngium spinosepalum*)	CNPS 1B	Found in the Sierra Nevada foothills and the San Joaquin Valley in vernal pools, swales, and roadside ditches. Often associated with clay soils in vernal pools within grassland communities. Occurs at elevations between 50 and 4,200 feet. Blooms April – July.	**Unlikely.** While the canal and treatment pond habitat could potentially offer the aquatic habitat needed for this species, the soil was sandy/loamy and CNDDB lists the species as possibly extirpated from the area. The nearest recorded observation of this species within the vicinity was approximately 12.1 miles northeast of the Project site in 1936.
Succulent owl's-clover (*Castilleja campestris* var. *succulenta*)	FT, CE, CNPS 1B	Occurs usually in wetlands and vernal pools but occasionally in non-wetlands. Often found in acidic soils at elevations below 2,500 feet. Blooms April – July.	**Absent.** The Project site does not provide suitable vernal pool habitat to support this species.

Table 4-11: List of Special Status Animals with Potential to Occur on the Project Site and/or in the Vicinity

Species	Status*	Habitat	Occurrence within the Project Site
American badger (*Taxidea taxus*)	CSSC	Prefers drier open stages of shrub, forest, and herbaceous habitats with friable soils to burrow, but can be found within numerous habitats throughout California, including the margins of agricultural lands. Needs a sufficient prey base of burrowing rodents.	**Unlikely.** The Project site and surrounding areas are frequently disturbed residential, ruderal, and cropland areas that are unsuitable for this species. This species could potentially pass through/ forage within the Project site, it is unlikely to establish dens there. The nearest recorded observation of this species within the vicinity was approximately 8.7 miles northeast of the Project site in 1987 at a private residence in south Clovis. During 1987. The area surrounding the residence was far less developed and had adjacent vegetated fields.
Blunt-nosed leopard lizard (*Gambelia sila*)	FE, CE, CFP	Occurs in the San Joaquin Valley region in expansive, arid areas with scattered vegetation. Today they inhabit non-native grassland and alkali sink scrub communities of the valley floor marked by poorly drained, alkaline, and saline soils. They can be found at elevations ranging from approx. 100 to 2,600 feet. They are absent from areas	**Unlikely.** The non-native grassland habitat present did not have the appropriate soil type and was routinely disturbed by active cropland, industrial facilities, and residential areas surrounding the Project site. There are no regional recorded observations of this species on the CNDDB.

Species	Status*	Habitat	Occurrence within the Project Site
		with steep slopes and dense vegetation, and areas subject to seasonal flooding. Adults may excavate shallow burrows but rely on deeper pre-existing rodent burrows for hibernation and reproduction.	
Burrowing owl (*Athene cunicularia*)	CC, CSSC	Resides in open, dry grasslands, deserts, scrublands, and other areas with low growing vegetation. Nests and roosts underground in existing burrows created by mammals, most often by ground squirrels, and human-made structures.	**Possible.** California ground squirrel burrows were present at the Project site. Foraging habitat and prey species were observed throughout the site. No signs of this species (whitewash, feathers, or owl pellets) were observed during the survey. The nearest recorded observation of this species within the vicinity was approximately 8.1 miles north of the Project site in 1990.
California glossy snake (*Arizona elegans occidentalis*)	CSSC	Inhabits arid scrub, rocky washes, grasslands, and chaparral. Prefers open areas with loose soil for easy burrowing. This species occurs near the Pacific Coast ranges from the eastern part of the San Francisco Bay Area south to northwestern Baja California but is absent along the central coast.	**Unlikely.** While the non-native grassland habitat had the appropriate soil for this species, the two records for this species in the region are from 1939 and 1893. The nearest recorded observation of this species within the vicinity was approximately 2.7 miles northwest of the Project site in 1893.
California tiger salamander – central California DPS (*Ambystoma californiense*)	FT, CT	Requires vernal pools or seasonal ponds for breeding and small mammal burrows for aestivation. Generally found in grassland and oak savannah plant communities in central California from sea level to 1,500 feet in elevation. Can migrate up to 1.3 miles to breed.	**Unlikely**. The Project site lacked vernal pools for breeding and the surrounding area was active cropland, industrial facilities, and residential areas. The nearest recorded observation was approximately 2.6 miles northwest of the Project site in 1936.
Coast horned lizard (*Phrynosoma blainvillii*)	CSSC	Found in grasslands, coniferous forests, woodlands, and chaparral, primarily in open areas with patches of loose, sandy soil and low-lying vegetation in valleys, foothills, and semi-arid mountains. Frequently found near ant hills and along dirt roads in lowlands along sandy washes with scattered shrubs.	**Unlikely.** While the non-native grassland habitat had the appropriate soil, this species is listed as "possibly extirpated" from the region and the only recorded observation was from 1893, approximately 2.6 miles northwest of the Project site.
Crotch's bumble bee (*Bombus crotchii*)	CCE	Occurs throughout coastal California, as well as east to the Sierra Nevada-Cascade crest, and south into Mexico. Food plant genera include snapdragons, scorpionweeds, primroses, poppies, and buckwheats. Nests are often located underground in abandoned rodent nests, or above ground in tufts of grass, old bird nests, rock piles, or cavities in dead trees. This species overwinters under leaf litter or soft soil.	**Unlikely.** While the Project site featured foraging and nesting opportunity for this species, it is highly disturbed from the residential and industrial areas within/ adjacent to the Project site as well as surrounding active cropland. The nearest recorded observation was approximately 2.6 miles northwest of the Project site in 1899.
Fresno kangaroo rat (*Dipodomys nitratoides exilis*)	FE, CE	An inhabitant of alkali sinks and open grassland habitats in Merced, Kings, Fresno, and Madera counties.	**Absent.** Alkaline sinks are absent from the Project site. The Project site and surrounding areas are frequently

Species	Status*	Habitat	Occurrence within the Project Site
		Prefers bare, alkaline, clay-based soils subject to seasonal inundation with more friable soil mounds around shrubs and grasses. The most recent recorded observation of this species in California was in 1992 in Fresno County.	disturbed from surrounding cropland, residential areas, and businesses. No signs of this species (tail drags, seed caches, etc.) were observed during the field surveys.
Least Bell's vireo (*Vireo bellii pusillus*)	FE, CE	This migratory species breeds in southern California. Breeding habitat consists of dense, low, shrubby, riparian vegetation in the vicinity of water or dry river bottoms. By the early 1980s, this species was extirpated from most of its historic range in California, including the Central Valley.	**Absent.** The Project site does not provide suitable riparian habitat to support this species.
Monarch butterfly (*Danaus plexippus*)	FPT	Roosts in wind-protected tree groves (eucalyptus, Monterey pine, cypress), with nectar and water sources nearby. Larval host plants consist of milkweeds. Winter roost sites extend along the Pacific Coast from northern Mendocino to Baja California, Mexico.	**Unlikely.** This species could travel through the Project site during breeding season. Potential roosting habitat was present with the eucalyptus trees at the MHP but was marginal and highly disturbed with routine landscaping. The Project site did have milkweed present but it was scarce and within the MHP.
Northern California legless lizard (*Anniella pulchra*)	CSSC	Found primarily underground, burrowing in loose, moist, and sandy soil. Forages in loose soil and leaf litter during the day. Occasionally observed on the surface at dusk and night.	**Unlikely.** The Project site mapped outside of the current known range of this species. While MHP had the appropriate soil and leaf litter around the eucalyptus trees, the area is highly disturbed with the surrounding area being active cropland, industrial facilities, and residential areas. The nearest recorded observation was from the 1880's, approximately 2.6 miles northwest of the Project site in foothill habitat. All other regional recorded observations have occurred in foothill habitat.
Northwestern pond turtle (*Actinemys marmorata*)	FPT, CSSC	An aquatic turtle of ponds, marshes, slow-moving rivers, streams, and irrigation ditches with riparian vegetation. Requires adequate basking sites and sandy banks or grassy open fields to deposit eggs.	**Possible**. The treatment ponds within the Project site offer banks for this species to use for basking and the nearby non-native grassland within the MHP could offer habitat for depositing eggs. While red-eared sliders were within that same area, it is possible for the two species to coexist. The nearest recorded observation was approximately 13.6 miles northeast of the Project site in 2016.
Pallid bat (*Antrozous pallidus*)	CSSC	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 may also use tree	**Unlikely.** While this species could utilize the non-native grassland habitat within the Project site for foraging and the industrial buildings adjacent to the Project site for roosting, the only recorded observation of this species was

Species	Status*	Habitat	Occurrence within the Project Site
		cavities, caves, bridges, and other human-made structures.	from 1909, approximately 5.8 miles northwest of the Project site.
San Joaquin kit fox (*Vulpes macrotis mutica*)	FE, CT	Opportunistically forages in a variety of habitats. Dens in burrows within alkali sink, valley grassland, and woodland habitats in valleys and adjacent foothills and in human-made structures in cities, rangeland, and agricultural areas. Occurs in the San Joaquin Valley and other smaller valleys to the west.	**Unlikely.** While the non-native grassland and pastureland habitat within the Project site offer foraging and possible denning habitat, no potential kit fox dens were identified during the survey. The Project site is located 24.5 miles east of the Western Madera County satellite population with no corridor to allow for ease of travel. The nearest recorded observation was approximately 9.2 miles northeast of the Project site in the 1980s.
Swainson's hawk (*Buteo swainsoni*)	CT	Nests in large trees in open areas adjacent to grasslands, grain or alfalfa fields, or livestock pastures suitable for supporting rodent populations.	**Possible.** This species can nest within the eucalyptus trees around the MHP and use the non-native grassland habitat to forage within the Project site. No individuals or nests were observed during the survey. The nearest recorded observation was approximately 0.8 miles northwest of the Project site in 2016.
Tricolored blackbird (*Agelaius tricolor*)	CT, CSSC	Nests colonially near fresh water in dense cattails or tules, or in thickets of riparian shrubs. Forages in grassland and cropland. Large colonies are often found foraging in dairy farm feed fields.	**Unlikely.** Suitable nesting habitat for this species was absent from the Project site but the non-native grassland and pastureland habitats could be utilized for foraging. The nearest recorded observation of this species within the vicinity was approximately 9.5 miles north of the Project site in 1975.
Valley elderberry longhorn beetle (*Desmocerus californicus dimorphus*)	FT	Lives in mature elderberry shrubs in the Central Valley and adjacent foothills from Tehama County south through Merced and Mariposa Counties with two scattered populations in Madera and Fresno Counties. Adults are active from March to June.	**Absent.** Elderberry shrubs required by this species were absent from the Project site.
Vernal pool fairy shrimp (*Branchinecta lynchi*)	FT	Occupies vernal and seasonal pools, with clear to tea-colored water, in grass or mud-bottomed swales, and basalt depression pools.	**Absent.** Suitable vernal pool habitats required by this species were absent from the Project site and surrounding areas.
Western mastiff bat (*Eumops perotis californicus*)	CSSC	Found in open, arid to semi-arid habitats, including dry desert washes, flood plains, chaparral, oak woodland, open ponderosa pine forest, grassland, and agricultural areas, where it feeds on insects in flight. Roosts most commonly in crevices in cliff faces but may also use high buildings and tunnels.	**Unlikely.** The Project site lacked high buildings, cliff crevices and tunnels for this species to roost but this species could use the Project site to forage. The nearest recorded observation was approximately 2.6 miles southwest of the Project site in 1958.
Western spadefoot (*Spea hammondii*)	FPT, CSSC	The majority of the time this species is terrestrial and occurs in small mammal burrows and soil cracks, sometimes in the bottom of dried pools. Prefers open areas with sandy or gravelly soils, in a variety of habitats including mixed woodlands,	**Unlikely.** While there were small mammal burrow present, the Project site and adjacent areas are very disturbed by active cropland, residential areas, and business facilities. The nearest recorded observation was at the

Species	Status*	Habitat	Occurrence within the Project Site
		grasslands, coastal sage scrub, chaparral, sandy washes, lowlands, river floodplains, alluvial fans, playas, alkali flats, foothills, and mountains. Vernal or seasonal pools, that hold water for a minimum of three weeks, are necessary for breeding.	San Joaquin River approximately 13.8 miles north of the Project site in 1911.
Western yellow-billed cuckoo (*Coccyzus americanus occidentalis*)	FT, CE	Suitable nesting habitat in California includes dense riparian willow-cottonwood and mesquite habitats along a perennial river. Once common in the California Central Valley, as well as coastal valleys and riparian habitats east of the Sierra Nevada, habitat loss now constrains the California breeding population to small numbers of birds.	**Absent.** The Project site does not provide suitable riparian habitat to support this species.

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

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

STATUS CODES

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

CNPS LISTING

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

4.4.2 IMPACT ANALYSIS

a) 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?

Less than Significant Impact with Mitigation Incorporated. Of the 12 regionally occurring special status plant species, all 12 are considered absent from or unlikely to occur within the Project site due to past or ongoing disturbance and/or the absence of suitable habitat. Since it is unlikely that these species would occur onsite, implementation of the project should have no impact on these 12 special status species through construction mortality, disturbance, or loss of habitat. Mitigation measures are not warranted.

Of the 21 regionally occurring special status animal species, 17 are considered absent from or unlikely to occur within the Project site due to past or ongoing disturbance and/or the absence of suitable habitat. These species include American badger, blunt-nosed leopard lizard, California glossy snake, California tiger salamander, Crotch's bumble bee, Fresno kangaroo rat, least Bell's vireo, monarch butterfly, northern California legless lizard, pallid bat, San Joaquin kit fox, tricolored blackbird, valley elderberry longhorn beetle, vernal pool fairy shrimp, western mastiff bat, western spadefoot, and western yellow-billed cuckoo.

Since it is unlikely that these species would occur onsite, implementation of the Project should have no impact on these 17 special status species through construction mortality, disturbance, or loss of habitat. Mitigation measures are not warranted.

General Project-Related Impacts

The Project has the potential to impact a number of sensitive resources, as described in more detail in the following sections. Impacts to these resources would be a violation of state and federal laws or considered a potentially significant impact under CEQA. Implementation of the mitigation measures BIO-1 and BIO-2 will help reduce potential impacts to these resources to a less than significant level under CEQA and will help with complying with State and federal laws protecting these resources. These mitigation measures are identified in Section 4.4.3 below.

Project-Related Mortality and/or Nest Abandonment of Migratory Birds, Raptors, and Special Status Birds

The site and adjacent areas contain suitable nesting and foraging habitat for a variety of protected bird species, such as migratory birds, raptors, and special status birds including Swainson's hawk. It is anticipated that during the nesting bird season, protected birds could nest on the ground or in shrubs and trees within, and adjacent to, the site and forage within the site. Protected birds located within or adjacent to the site during construction have the potential to be injured or killed by project-related activities. In addition to the direct "take" of protected birds within the site and adjacent areas, these birds nesting in these areas could be disturbed by project-related activities resulting in nest abandonment. Projects that adversely affect the nesting success of protected birds or result in the mortality of these birds would be a violation of State and federal laws and considered a potentially significant impact under CEQA and NEPA.

While foraging habitat for protected birds, such as burrowing owl (BUOW) and Swainson hawk (SWHA), is present on the site, suitable foraging habitat is located adjacent to the site and within the vicinity of the site. Loss of the foraging habitat from implementation of the project is not considered a significant impact.

Implementation of mitigation measures BIO-3, BIO-4, and BIO-5 will reduce potential impacts to protected nesting birds to a less than significant level under CEQA and will help the project comply with State and federal laws protecting these bird species. Mitigation measures specific to BUOW are presented in the following section and are listed Section 4.4.3.

Project-Related Mortality and/or Disturbance to Burrowing Owl

The Project site contained suitable foraging habitat for BUOW, and this species also may nest or roost within burrows within, or adjacent to, the site. Construction activities that adversely affect the nesting success of BUOWs or result in the mortality of individuals constitute a violation of state and federal laws and would be considered a significant impact under CEQA. While the Project site may remove some potential nesting/roosting and foraging habitat for BUOW, there is abundant habitat adjacent to the site that could be used, and implementation of the project would not significantly reduce potential nesting, roosting, and foraging habitat for this species. Therefore, no mitigation measures are warranted for loss of BUOW nesting/roosting and foraging habitat.

Implementation of mitigation measures BIO-6, BIO-7, and BIO-8 will reduce potential impacts to nesting and roosting BUOW to a less than significant level under CEQA and help the project comply with state and federal laws protecting this avian species.

Project-Related Mortality and/or Disturbance to Northwestern Pond Turtle

The Project site contained treatment ponds at both the MHP and WWTF which could be used by northwestern pond turtle for dispersal and basking. The non-native grassland and pastureland habitat of the Project site could be used by northwestern pond turtle for nesting and foraging. Upland areas would be temporarily impacted through project activities. Noise, vegetation removal, movement of workers, construction, and ground disturbance as a result of project activities have the potential to significantly impact northwestern pond turtle. Potentially significant impacts associated with project activities could include inadvertent entrapment or direct mortality. Project activities that impact northwestern pond turtles would be considered a potentially significant impact under CEQA.

Mitigation measures BIO-9, BIO-10, and BIO-11 will be implemented prior to the start of construction and will reduce impacts to northwestern pond turtle to a less than significant level under CEQA.

b) 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?

No Impact. Riparian habitat is absent from the Project site and adjacent lands. There are no CNDDB-designated "natural communities of special concern" recorded within the Project site or surrounding lands. There would be no impact and mitigation is not warranted.

c) Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Less than Significant Impact with Mitigation Incorporated. The Project involves the demolishing of equipment in the dissolved air flotation basin, installing one recirculating pump, installing oil and grease removal in grit chamber, modifying the air piping, installing recirculation flow meter and sludge flow meters, removal of berms between three treatment ponds, replacing one influent pump, replacing one blower, and constructing new circular clarifiers at the WWTF and constructing a new lift station, force main, and a gravity sewer main at the MHP. The USFWS NWI Map was consulted for known wetlands in the area. According to the USFWS NWI Map, Central Canal, Washington Colony Canal, and Oleander Canal

were classified as riverine. Additionally, the ponds located at the WWTF and MHP are classified as freshwater ponds (see Figure 4-4). Project-related impacts to some or all of these waters would be considered a potentially significant impact under CEQA and NEPA. Impacts to waters of the U.S. are also subject to the permit requirements of Sections 401 and 404 of the Clean Water Act and impacts to waters of the state are subject to the permit requirements of Section 401 of the Clean Water Act and California Fish and Game Code. The placement of fill within any wetlands or other jurisdictional features will require a 401 Water Quality Certification from the RWQCB, 404 permit from the USACE, and a Lake or Streambed Alteration Agreement from CDFW.

There are no designated wild and scenic rivers within the Project site; therefore, the project would not result in direct impacts to wild and scenic rivers.

If construction involves ground disturbance over an area greater than one acre, the Project would need to obtain a Construction General Permit under the Construction Storm Water Program administered by the RWQCB. A prerequisite for this permit is the development of a Storm Water Pollution Prevention Plan to ensure construction activities do not adversely affect water quality. This plan will need to be prepared in support of the Construction General Permit application.

Implementation of mitigation measure BIO-12 will reduce potential impacts to waters to a less than significant level under CEQA and will ensure compliance with state and federal laws protecting these waters.

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?

Less than Significant Impact. The three canals within the Project site could be potentially used as a wildlife movement corridor, but disturbance to these canals would be temporary in nature and would not disturb wildlife movement. Furthermore, the Project site is in an area regularly disturbed by humans which would discourage dispersal and migration.

The Project site had eucalyptus trees that could be used by nesting birds, which are considered native wildlife nursery sites. The potential impacts to nesting birds have been addressed in mitigation measures BIO-3, BIO-4, and BIO-5. It is unlikely other native species will utilize any features of the Project site as a wildlife nursery site.

Most of the Project site does not contain features that would be likely to function as wildlife movement corridors. All canals within the Project site could be potentially used as a wildlife movement corridor, but disturbance to these canals would be temporary in nature and would not disturb wildlife movement. Furthermore, the Project is in an area regularly disturbed by humans which would discourage dispersal and migration. Therefore, impacts would be less than significant.

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

No Impact. The Project appears to be consistent with the goals and policies of the Fresno County General Plan. There are no known Habitat Conservation Plans (HCPs) or Natural Communities Conservation Plan (NCCPs) in the Project vicinity. There would be no impact and mitigation measures are not warranted.

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?

No Impact. The Project is not located within the boundaries of an adopted HCP, NCCP, or other approved local, regional, or State habitat conservation plan. There would be no impact and mitigation measures are not warranted.

4.4.3 MITIGATION

BIO-1 (***WEAP Training***): Prior to initiating construction activities (including staging and mobilization), all personnel associated with project construction will attend a mandatory Worker Environmental Awareness Program (WEAP) training, conducted by a qualified biologist (someone familiar with the identification and habitats of these species), to aid workers in identifying special status resources that may occur in the Project site. The specifics of this program will include identification of the sensitive species and suitable habitats, a description of the regulatory status and general ecological characteristics of sensitive resources, and review of the limits of construction and mitigation measures required to reduce impacts to biological resources within the work area. This training will discuss special status species, describe the laws and regulations in place to provide protection of these species, identify the penalties for violation of applicable environmental laws and regulations, and include a list of required protective measures to avoid "take." A fact sheet summarizing this information, along with photographs or illustrations of sensitive species with potential to occur on the Project site, will also be prepared for distribution to all contractors, their employees, and all other personnel involved with construction of the project. All trainees will sign a form documenting that they have attended WEAP training and understand the information presented to them.

BIO-2 (***BMPs***): The project proponent will require that all workers employ the following BMPs in order to avoid and minimize potential impacts to special status species:

- Vehicles will observe a 15-mph speed limit while on unpaved access routes.
- All open trenches, holes, sumps, and other excavations greater than 6-inches with sidewalls steeper than a 1:1 (45 degree) slope will have an escape ramp of earth or a non-slip material with a less than 1:1 slope or these will be covered with barrier material such that animals are unable to dig or squeeze under the barrier and become entrapped.
- Workers will inspect areas beneath parked vehicles, equipment, and materials prior to mobilization. If special status species are detected, the individual will either be allowed to leave of its own volition or will be captured by the qualified biologist (must possess appropriate collecting/handling permits) and relocated out of harm's way to the nearest suitable habitat beyond the influence of the project work area. "Take" of a state or federal special status (rare, California Species of Special Concern, threatened, or endangered) species is prohibited without the necessary federal or state take permit(s).
- The presence of any special status species will be reported to the project's qualified biologist, who will submit the occurrence to the CNDDB. If necessary, the biologist will report the occurrence to CDFW and/or USFWS.

BIO-3 (*Avoidance*): The project's construction activities will occur, if feasible, between September 16 and January 31 (outside of the nesting bird season) to avoid impacts to nesting birds.

BIO-4 (*Pre-construction Surveys*): If activities must occur within nesting bird season (February 1 to September 15), a qualified biologist will conduct a one-time take avoidance survey for Swainson's hawk nests onsite and within a 0.5-mile radius within ten (10) calendar days prior to the start of construction. This survey will be conducted in accordance with the *Recommended Timing and Methodology for Swainson's Hawk Nesting Surveys in California's Central Valley* (Swainson's Hawk Technical Advisory Committee, 2000), or current guidance. The survey would also include inspecting for nesting migratory birds within up to 50 feet outside of the Project site and for other nesting raptors within up to 450 feet outside of the Project site. All raptor nests would be considered "active" upon the nest-building stage. If no active nests are observed, no further mitigation is required. If construction is delayed or halted for more than ten (10) days, another pre-construction survey for nesting birds will be conducted.

BIO-5 (*Avoidance Buffers*): On discovery of any active nests or breeding colonies near work areas, a qualified biologist will determine appropriate avoidance buffer distances based on applicable CDFW and/or USFWS guidelines, the biology of the species, conditions of the nest(s), and the level of project disturbance.

BIO-6 (*Pre-construction Take Avoidance Survey*): A qualified biologist (someone familiar with the identification and sign of this species) will conduct a pre-construction take avoidance survey for BUOW and suitable burrows, in accordance with CDFW's *Staff Report on Burrowing Owl Mitigation* (2012), within seven (7) days prior to the start of construction activities. The survey will include the proposed work area and accessible surrounding land up to 500 feet. If construction is delayed or halted for more than seven (7) days, another pre-construction survey for BUOW will be conducted. If no BUOW individuals or active burrows are observed, no further mitigation is required.

BIO-7 (*Avoidance*): If an active BUOW burrow is detected, avoidance buffers will be implemented. A qualified biologist will determine appropriate avoidance buffer distances based on CDFW's 2012 *Staff Report on Burrowing Owl Mitigation*, the biology of BUOW, conditions of the burrow(s), and the level of project disturbance. If necessary, avoidance buffers will be identified with flagging, fencing, or other easily visible means, and will be maintained until the biologist has determined that the nestlings have fledged and all BUOW have left the project area.

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

BIO-8 (*ITP* and *Passive Relocation*): If an active BUOW burrow is detected within the proposed work area and cannot be avoided, it is recommended the project obtain an Incidental Take Permit (ITP) in order to implement protection plans and/or relocation plans in consultation with CDFW and/or USFWS and protect the project from "take" of this species.

BIO-9 (*Pre-construction Survey and Avoidance Buffers*): Within seven (7) days prior to the start of construction, a qualified biologist (someone familiar with the identification and habitat of this species) will conduct a pre-construction survey for northwestern pond turtle within the Project site and surrounding areas up to 330 feet. Pre-construction surveys will be conducted in accordance with the draft *Western Pond Turtle (Emys marmorata) Visual Survey Protocol for the Southcoast Ecoregion* (United States Geological Survey, 2006), or current guidance. If no northwestern pond turtles are observed during the pre-construction survey, then construction activities may begin. If construction is delayed or halted for more than seven (7) days, another pre-construction survey for northwestern pond turtle will be conducted. If the surveys results in the identification of a northwestern pond turtle or an individual is found on the Project site during construction activities, it will be allowed to leave the Project site on its own and the qualified biologist will determine appropriate buffers to be implemented to avoid impacts to the individual(s).

BIO-10 (*Monitor*): If northwestern pond turtles are observed on the Project site, a qualified biologist will conduct a pre-activity clearance survey each day and remain on the Project site to oversee all vegetation clearing and ground disturbing activities until the individual(s) have left the Project site.

BIO-11 (*Formal Consultation*): Should northwestern pond turtles get listed in this area and the project/qualified biologist needs to move an individual, consultation for protection plans and/or relocation plans with the appropriate agencies will be completed to avoid take.

BIO-12 (*Permits*): If the project intends to impact jurisdictional waters, permits with USACE, RWQCB, and/or CDFW will be obtained to comply with state and federal regulations, if necessary. These permits, certifications, and agreements would ensure impacts to waters are minimized to the extent possible and permanent impacts would be offset by compensatory mitigation.



Legend

- Project Site
- Malaga CWD Boundary
- Wetland Visible in Aerial

National Wetland Inventory

- Freshwater Pond
- Riverine

0 0.1 0.2

Miles

Comunidad Nuevo Lago Mobile Home Park Sewer Consolidation Project

PROVOST& PRITCHARD

4.5 CULTURAL RESOURCES

Table 4-12: Cultural Resources Impacts

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource pursuant to in § 15064.5?	☐	☒	☐	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	☐	☒	☐	☐
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☒	☐	☐

4.5.1 BASELINE CONDITIONS

4.5.1.1 ARCHAEOLOGICAL AND BUILT ENVIRONMENT SURVEY

A Phase I Cultural Resources Assessment, prepared by Taylored Archaeology, for the Project (see Appendix C). On May 24 and May 31, 2025, Taylored Archaeology archaeologist conducted an archaeological and built environment survey of the Project site. Four (4) meter transect were walked on both sides of all roadways in all unpaved areas within the Project site. All areas that included paved roads and private property were given an opportunistic survey whereby the ground was accessible and had clear visibility. The exposed road shoulders, all open ground within the ROW, grass areas adjacent to sidewalks where meter installations are planned, and new pipeline construction proposed were surveyed. The canals were also assessed and measured using a measuring tape.

The survey showed the Project site consisted of three portions: the ROW alongside rural county streets, the Shady Lakes MHP (which is not Comunidad Nuevo Lago MHP), and the Malaga WWTF. Ground cover along the ROW consisted of asphalt pavement along South Maple, East American, and South Chestnut Avenues, and pavement, thick vegetation, and dirt/gravel along the road shoulders. Ground visibility ranged from excellent to poor in nonpaved areas of the Project site. The ground visibility in the public ROW was nonexistent to poor (0-30 percent) along road shoulders in areas with dense vegetation, and excellent (100 percent) in areas of no pavement or vegetation. There was a moderate amount of modern refuse such as broken glass, ceramic, and plastic sherds found on the road shoulders throughout the Project site. Ground visibility within unpaved portions of the MHP portion of the Project site was very good (80 to 90 percent). The disposal pond within the MHP was fenced off and inaccessible, though the basin was viewable from behind the fence. The ground surface visibility within unpaved portions of the Malaga WWTF was excellent (100 percent. No archaeological sites, isolated artifacts, or features were identified during the survey. However, segments of four historical canals intersect the Project site.

4.5.1.2 RECORDS SEARCH

On April 2, 2025, Taylored Archaeology requested a cultural resource records search from the Southern San Joaquin Valley Information Center (SSJVIC) of the California Historical Resources Information System (CHRIS) at California State University in Bakersfield, California. The purpose of this request was to identify and review prior cultural resource investigations completed in or near the Project site and identify any prehistoric or historical resources that had been previously recorded within the Project site and a 0.5-mile radius of the surrounding area. On May 12, 2025, the SSJVIC provided CHRIS records search results. The SSJVIC records search revealed that there have been 12 cultural resources studies within the Project site.

The records search also indicated that there has been six cultural resources studies within a 0.5-mile radius of the surrounding area. Five previously recorded cultural resources were reported within the Project site. Two of these resources (P-10-002960 and P-10-004303) are agricultural historic districts east of SR 41 and west of SR 99 and overlap the Project site. Three of these resources are historic era canals. One resource (P-10-004677) was erroneously recorded as the Central No. 23 Canal. Resource P-10-004677 contains both the Central No. 23 Canal and the Viau No. 25 Canal, both of which date to the 1880s. Five cultural resources were recorded within a 0.5-mile radius of the Project site, all historic era.

4.5.1.3 NATIVE AMERICAN OUTREACH

Taylored Archaeology requested a Sacred Lands File (SLF) search from the Native American Heritage Commission (NAHC) on April 2, 2025. The SLF search was requested to identify whether there are previously known or recorded sensitive or sacred tribal cultural resources in the vicinity of the Project site that could be affected by the proposed Project. The NAHC also included contact information of local Native American representatives who may have knowledge or interest in sharing information of resources of sacred significance present in or near the Project site. On May 14, 2025, an outreach letter and a map describing the Project and its location was sent to the following representatives from the list provided by NAHC:

1. Chairperson Delia Dominguez of Kitanemuk and Yowlumne Tejon Indians
2. Chairperson Michelle Heredia-Cordova of Table Mountain Rancheria
3. Cultural Resource Director Bob Pennell of Table Mountain Rancheria
4. Environmental Department Director Kerri Vera of the Tule River Tribe
5. Chairperson Neil Peyron of the Tule River Indian Tribe
6. Chairperson Kenneth Woodrow of the Wuksachi Indian Tribe/Eshom Valley Band

Follow-up communication was performed by email on June 18, 2025, and no responses were received from any tribes.

4.5.2 IMPACT ANALYSIS

a) Would the project cause a substantial adverse change in the significance of a historical resource pursuant to in § 15064.5?

b) Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

Less than Significant Impact with Mitigation Incorporated. A CHRIS records search, from the SSJVIC, was conducted on April 2, 2025. The search confirmed 12 cultural resources studies within the Project site. The records search also indicated that there has been six cultural resources studies within a 0.5-mile radius of the surrounding area. Five previously recorded cultural resources were reported within the Project site. This Project would not impact any of these cultural resources. However, in the improbable event that unknown cultural resources are encountered during proposed Project construction, implementation of mitigation measure CUL-1 outlined below will reduce impacts to any historical or archaeological resource to less than significant.

c) Would the project disturb any human remains, including those interred outside of dedicated cemeteries?

Less than Significant Impact with Mitigation Incorporated. There is no evidence in the record that indicates the proposed Project has the potential to be an unknown burial site or the site of buried human remains. In the unlikely event of such a discovery, mitigation shall be implemented. With incorporation

of mitigation measure CUL-2 outlined below, impacts resulting from the discovery of remains interred on the Project area will be less than significant

4.5.3 MITIGATION

CUL-1 (Archaeological Remains) If previously unidentified archaeological remains are encountered during development or ground-moving activities in the Project site, all work should be halted until a qualified archaeologist can identify the discovery and assess its significance. In the event of accidental discovery of unidentified archaeological remains during development or ground-moving activities in the Project site, all work shall be halted in the immediate vicinity until a qualified archaeologist can identify the discovery and assess its significance.

CUL-2 (Human Remains) If human remains are uncovered during construction, the Fresno County Coroner is to be notified to investigate the remains and arrange proper treatment and disposition. If the remains are identified on the basis of archaeological context, age, cultural associations, or biological traits to be those of a Native American, California Health and Safety Code 7050.5 and PRC 5097.98 require that the coroner notify the NAHC within 24 hours of discovery. The NAHC will then identify the Most Likely Descendent who will be afforded an opportunity to make recommendations regarding the treatment and disposition of the remains.

4.6 ENERGY

Table 4-13: Energy Impacts

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

4.6.1 BASELINE CONDITIONS

Pacific Gas & Electric Company supplies electricity and natural gas to the Project area.[5] Current site operations require diesel and gasoline fuel to make maintenance visits, as necessary. Operational energy consumption is composed of electricity consumption to power the existing infrastructure and appurtenances. New construction would be subject to Titles 20 and 24 of the California Code of Regulations which each serve to reduce demand for electrical energy by implementing energy-efficient standards for residential and non-residential buildings. Power is currently available to the Project site.

4.6.2 IMPACT ANALYSIS

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

Less than Significant Impact. Fuel consumed by construction equipment would be the primary energy resource expended over the course of Project construction. Energy use during operations would be comparable to existing use. California Code of Regulations Title 13, Motor Vehicles, Section 2449(d)(2), Idling, limits idling times of construction vehicles to no more than five minutes, thereby precluding unnecessary and wasteful consumption of fuel because of unproductive idling of construction equipment. In addition, the energy consumption for construction activities would not be ongoing as they would be limited to the duration of Project construction.

Energy consumption of non-residential uses is currently governed by the 2022 California Building Code (CBC), Part 6 for structures, and Title 20 of the California Code of Regulations for appliances. Energy consumption is anticipated to decrease over time as more energy efficient standards take effect and energy-consuming equipment reaches its end-of-life and necessitates replacement. The proposed Project would comply with construction best management practices. Therefore, impacts would be less than significant.

b) Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

[5] (Pacific Gas & Electric Company, 2024)

No Impact. State and local authorities regulate energy use and consumption. These regulations at the State level are intended to reduce energy use and Greenhouse Gas (GHG) emissions. These include, among others, Assembly Bill (AB) 1493 – Light-Duty Vehicle Standards; California Code of Regulations Title 24, Part 6 – Energy Efficiency Standards; and California Code of Regulations Title 24, Parts 6 and 11 – California Energy Code and Green Building Standards. The proposed Project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency. Therefore, there would be no impact.

4.7 GEOLOGY AND SOILS

Table 4-14: Geology and Soils Impacts

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
ii. Strong seismic ground shaking?	☐	☐	☒	☐
iii. Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv. Landslides?	☐	☐	☐	☒
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
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?	☐	☐	☒	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994) creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geological feature?	☐	☒	☐	☐

4.7.1 BASELINE CONDITIONS

4.7.1.1 GEOLOGY AND SOILS

The Project is located in Fresno County, in the southern section of California's Great Valley Geomorphic Province, or Central Valley. The Sacramento Valley makes up the northern third and the San Joaquin Valley makes up the southern two-thirds of the geomorphic province.[6] Both valleys are watered by large rivers flowing west from the Sierra Nevada Range, with smaller tributaries flowing east from the Coast Ranges. Most of the surface of the Great Valley is covered by Quaternary (present day to 1.6 million years ago)

[6] (California Department of Conservation, 2002)

alluvium. The sedimentary formations are steeply upturned along the western margin due to the uplifted Sierra Nevada Range. From the time the Valley first began to form, sediments derived from erosion of igneous and metamorphic rocks and consolidated marine sediments in the surrounding mountains have been transported into the Valley by streams.

4.7.1.2 FAULTS AND SEISMICITY

The Project site is not located within the Alquist-Priolo Earthquake Fault Zone and no known faults cut through the soil at the site. The nearest major fault is the San Andreas Fault, located approximately 72 miles west-southwest of the Project site.[7] The San Andreas Fault is the dominant active tectonic feature of the Coast Ranges and represents the boundary of the North American and Pacific plates. A smaller fault zone, the Nunez Fault, is located approximately 50 miles southwest.[8]

4.7.1.3 LIQUEFACTION

The potential for liquefaction, which is the loss of soil strength due to seismic forces, is dependent on soil types and density, the groundwater table, and the duration and intensity of ground shaking. Although no specific liquefaction hazard areas have been identified in Fresno County, this potential is recognized throughout the San Joaquin Valley where unconsolidated sediments and a high-water table coincide. It is reasonable to assume that due to the depth to groundwater within Fresno County, liquefaction hazards would be negligible.

4.7.1.4 SOIL SUBSIDENCE

There are two types of Subsidence: Land subsidence and hydrocompaction subsidence. Hydrocompaction subsidence occurs when a large land area settles due to over-saturation. These areas are typically composed of open-textured soils that become saturated, high in silt or clay content. Land subsidence occurs when an extensive amount of ground water, oil, or natural gas is withdrawn from below the ground surface. The San Joaquin Valley has become an area that has increasingly experienced subsidence due to excessive groundwater pumping activities lowering the water table.

4.7.1.5 DAM AND LEVEE FAILURE

The nearest inundation zone from a dam or levee failure is located approximately 2.2 miles north of the Project site. This inundation zone originates from the Fancher Creek Detention.[9]

4.7.2 IMPACT ANALYSIS

a) Would the project 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.

   ii. Strong seismic ground shaking?

[7] (California Department of Conservation, 2023)
[8] Ibid.
[9] (California Department of Water Resources, 2022)

Less than Significant Impact. The Project site is located in an area traditionally characterized by relatively low seismic activity. The Project site is not located in an Alquist-Priolo Earthquake Fault Zone as established by the Alquist-Priolo Fault Zoning Act. The nearest major fault is the San Andreas Fault, located approximately 72 miles west-southwest of the Project site. All proposed Project features would be constructed in a manner to handle seismic events, as required by the CBC. This would result in less than significant impacts. In addition, the Project would not include habitable structures; therefore, the Project would not result in potential substantial adverse effects, including the risk of loss, injury, or death. Impacts would be less than significant.

iii. Seismic-related ground failure, including liquefaction?

Less than Significant Impact. Liquefaction occurs when loose, water-saturated sediments lose strength and fail during strong ground shaking. Generally, liquefiable areas are generally confined to the Valley floor covered by Quaternary-age alluvial deposits, Holocene soil deposits, current river channels, and active wash deposits and their historic floodplains, marshes, and dry lakes. Specific liquefaction hazard areas have not been identified in Fresno County. The Project site is not located within a wetland area, and it is located in an area in the County where liquefaction risk is considered low to moderate. Impacts would be less than significant.

iv. Landslides?

No Impact. The Project is located on the Valley floor where no major geologic landforms exist on or near the site that could result in a landslide event. The potential landslide impact at this location is minimal as the site is not adjacent to high-sloping lands and the local topography is essentially flat. There would be no impact.

b) Would the project result in substantial soil erosion or the loss of topsoil?

Less than Significant Impact. Earthmoving activities associated with the Project would include excavation and basin construction. These activities could expose soils to erosion processes and the extent of erosion would vary depending on slope steepness/stability, vegetation/cover, concentration of runoff, and weather conditions. Dischargers whose projects disturb one (1) or more acres of soil, or whose projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the General Permit for Discharges of Storm Water Associated with Construction Activity Construction General Permit (CGP) Order 2009-0009-DWQ. Construction activity subject to this permit includes clearing, grading, and disturbances to the ground such as stockpiling or excavation but does not include regular maintenance activities performed to restore the original line, grade, or capacity of the facility. The CGP requires the development of a Storm Water Pollution Prevention Plan (SWPPP) by a certified Qualified SWPPP Developer. Since the Project site has relatively flat terrain with a low potential for soil erosion and would comply with the SWRCB requirements of implementing a SWPPP, the impact would be less than significant.

c) 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?

Less than Significant Impact. The Project would not contain any facilities that could be affected by expansive soils, nor would substantial grading change the topography such that the Project would generate substantial risks to life or property. In addition, the Project site does not include soils that are conducive to expanding and contracting; therefore, impacts would be less than significant.

d) Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Less than Significant Impact. The Project would not contain any facilities that could be affected by expansive soils, nor would substantial grading change the topography such that the Project would generate substantial risks to life or property. In addition, the Project site does not include soils that are conducive to expanding and contracting; therefore, impacts would be less than significant.

e) Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

No Impact. The Project would construct improvements to an existing WWTF. Therefore, the Project would not require the use of additional septic tanks or alternative wastewater disposal systems. There would be no impact.

f) Would the project directly or indirectly destroy a unique paleontological resource or site or unique geological feature?

Less than Significant Impact with Mitigation Incorporated. No known paleontological resources have been identified at the Project site. However, during construction, there is potential for a paleontological resource to be found. GEO-1 will be implemented in the unlikely event that paleontological resources are encountered during Project construction. Any impacts would be considered less than significant.

4.7.3 MITIGATION

GEO-1 Should paleontological resources be encountered on the Project site, all ground disturbing activities in the area shall stop. A qualified paleontologist shall be contacted to assess the discovery. Mitigation may include monitoring, recording the fossil locality, data recovery and analysis, and preparing a final report. Public educational outreach may also be appropriate. Upon completion of the assessment, a report documenting methods, findings, and recommendations shall be prepared and submitted to Fresno County for review, and (if paleontological materials are recovered) a paleontological repository, such as the University of California Museum of Paleontology.

4.8 GREENHOUSE GAS EMISSIONS

Table 4-15: Greenhouse Gas Emissions Impacts

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

4.8.1 BASELINE CONDITIONS

Commonly identified GHG emissions and sources include the following:

Carbon dioxide (CO_2) is an odorless, colorless natural greenhouse gas. CO_2 is emitted from natural and anthropogenic sources. Natural sources include the following: decomposition of dead organic matter; respiration of bacteria, plants, animals, and fungus; evaporation from oceans; and volcanic out gassing. Anthropogenic sources include the burning of coal, oil, natural gas, and wood.

Methane (CH_4) is a flammable greenhouse gas. A natural source of methane is the anaerobic decay of organic matter. Geological deposits, known as natural gas fields, also contain methane, which is extracted for fuel. Other sources are from landfills, fermentation of manure, and ruminants such as cattle.

Nitrous oxide (N_2O), also known as laughing gas, is a colorless greenhouse gas. Nitrous oxide is produced by microbial processes in soil and water, including those reactions that occur in fertilizer containing nitrogen. In addition to agricultural sources, some industrial processes (fossil fuel-fired power plants, nylon production, nitric acid production, and vehicle emissions) also contribute to its atmospheric load.

Water vapor is the most abundant, and variable greenhouse gas. It is not considered a pollutant; in the atmosphere, it maintains a climate necessary for life.

Ozone (O_3) is known as a photochemical pollutant and is a greenhouse gas; however, unlike other greenhouse gases, ozone in the troposphere is relatively short-lived and, therefore, is not global in nature. O_3 is not emitted directly into the atmosphere but is formed by a complex series of chemical reactions between volatile organic compounds, nitrogen oxides, and sunlight.

Aerosols are suspensions of particulate matter in a gas emitted into the air through burning biomass (plant material) and fossil fuels. Aerosols can warm the atmosphere by absorbing and emitting heat and can cool the atmosphere by reflecting light.

Chlorofluorocarbons (CFCs) are nontoxic, nonflammable, insoluble, and chemically unreactive in the troposphere (the level of air at the earth's surface). CFCs were first synthesized in 1928 for use as refrigerants, aerosol propellants, and cleaning solvents. CFCs destroy stratospheric ozone; therefore, their production was stopped as required by the Montreal Protocol in 1987.

Hydrofluorocarbons (HFCs) are synthetic chemicals that are used as a substitute for CFCs. Of all the greenhouse gases, HFCs are one of three groups (the other two are perfluorocarbons and sulfur hexafluoride) with the highest global warming potential. HFCs are human-made for applications such as air conditioners and refrigerants.

Perfluorocarbons (PFCs) have stable molecular structures and do not break down through the chemical processes in the lower atmosphere; therefore, PFCs have long atmospheric lifetimes, between 10,000 and 50,000 years. The two main sources of PFCs are primary aluminum production and semiconductor manufacture.

Sulfur hexafluoride (SF_6) is an inorganic, odorless, colorless, nontoxic, nonflammable gas. It has the highest global warming potential of any gas evaluated. Sulfur hexafluoride is used for insulation in electric power transmission and distribution equipment, in the magnesium industry, in semiconductor manufacturing, and as a tracer gas for leak detection.

There are uncertainties as to exactly what the climate changes will be in various local areas of the earth, and what the effects of clouds will be in determining the rate at which the mean temperature will increase. There are also uncertainties associated with the magnitude and timing of other consequences of a warmer planet: sea level rise, spread of certain diseases out of their usual geographic range, the effect on agricultural production, water supply, sustainability of ecosystems, increased strength and frequency of storms, extreme heat events, air pollution episodes, and the consequence of these effects on the economy.

Emissions of GHGs contributing to global climate change are largely attributable to human activities associated with the industrial/manufacturing, utility, transportation, residential, and agricultural sectors. About three-quarters of human emissions of CO_2 to the global atmosphere during the past 20 years are due to fossil fuel burning. Atmospheric concentrations of CO_2, CH_4, and N_2O have increased by at least 40 percent, 150 percent, and 20 percent respectively since the year 1750. GHG emissions are typically expressed in carbon dioxide-equivalents (CO_2e), based on the GHG's Global Warming Potential (GWP). The GWP is dependent on the lifetime, or persistence, of the gas molecule in the atmosphere. For example, one ton of CH_4 has the same contribution to the greenhouse effect as approximately 25 tons of CO_2. Therefore, CH_4 is a much more potent GHG than CO_2. In accordance with SJVAPCD's CEQA Greenhouse Gas Guidance for Valley Land-use Agencies in Addressing GHG Emission Impacts for New Projects proposed projects complying with Best Performance Standards (BPS) would be determined to have a less-than significant impact.[10] Projects not complying with BPS would be considered less than significant if operational GHG emissions would be reduced or mitigated by a minimum of 29 percent, in comparison to business-as-usual (year 2004) conditions. In addition, project-generated emissions complying with an approved plan or mitigation program would also be determined to have a less-than-significant impact.

4.8.2 IMPACT ANALYSIS

Construction of the Project is assumed to be completed over the course of approximately 24 months. Emissions associated with the Project were calculated using CalEEMod Air Quality Model, Version 2022.1.1.29. The emissions modeling includes emissions generated by off-road equipment and haul trucks. All other assumptions are based upon the default parameters contained in the model. Localized air quality impacts associated with operations of the proposed Project would be minor and were qualitatively assessed. Modeling assumptions and output files are included in Appendix A.

[10] Invalid source specified.

Estimated construction-generated emissions are summarized in Table 4-16. GHGs impact the environment over time as they increase and contribute to climate change. Any changes in operational emissions would be negligible compared to the existing operations.

Table 4-16: Short-Term Construction-Related GHG Emissions

	Emissions (MT CO2e) in TPY
Maximum Annual Construction CO_2e Emissions	292
AB 32 Consistency Threshold for Land-Use Development Projects*	1,100
AB 32 Consistency Threshold for Stationary Source Projects*	10,000
Threshold Exceeded?	No

Construction related generation of GHGs would be a maximum of 292 metric tons of carbon dioxide equivalent ($MTCO_2e$) per year, while operational generation of GHGs are expected to be negligible due to the passive nature of the proposed use. The Project would not exceed the AB 32 consistency threshold for land use projects for both short-term construction emissions and long-term operational emissions as a result.

a) Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Less than Significant Impact. The Project would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment. As shown in Table 4-16, the Project is not expected to result in the generation of GHG emissions that would exceed the AB 32 consistency threshold of 1,100 $MTCO_2e$ annually during construction activities. Therefore, impacts would be less than significant.

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

No Impact. The Project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. The Project would be in compliance with all SJVAPCD policies and regulations and would not exceed an applicable threshold for GHG emissions. Therefore, there would be no impact.

4.9 HAZARDS AND HAZARDOUS MATERIALS

Table 4-17: Hazards and Hazardous Materials Impacts

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?	☐	☐	☒	☐
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?	☐	☐	☒	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒
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?	☐	☐	☐	☒
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g) Expose people or structures, either directly or indirectly to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☒	☐

4.9.1 BASELINE CONDITIONS

4.9.1.1 HAZARDOUS MATERIALS

The Hazardous Waste and Substances Sites (Cortese) List is a planning document used by the State, local agencies, and developers to comply with CEQA requirements in providing information about the location of hazardous materials release sites. Government Code Section 65962.5 requires the California Environmental Protection Agency to develop at least annually an updated Cortese List. The Department of Toxic Substances Control (DTSC) is responsible for a portion of the information contained in the Cortese List. Other State and local government agencies are required to provide additional hazardous material release information for the Cortese List. DTSC's EnviroStor database provides DTSC's component of Cortese List data. In addition to the EnviroStor database, the SWRCB GeoTracker database provides information on

regulated hazardous waste facilities in California, including underground storage tank (UST) cases and non-UST cleanup programs, including Spills-Leaks-Investigations-Cleanups sites, Department of Defense (DOD) sites, and Land Disposal program. A search of the DTSC EnviroStor database and the SWRCB GeoTracker performed on April 25, 2025, determined that there are no known active hazardous waste generators or hazardous material spill sites within the Project site.[11] There are a couple inactive or case closed sites adjacent to the ROW where construction would take place.

4.9.1.2 AIRPORTS

The Fresno Yosemite International Airport is the nearest airport to the proposed Project, located approximately 6.5 miles northeast.

4.9.1.3 EMERGENCY RESPONSE PLAN

The County of Fresno Public Health Emergency Preparedness (PHEP) is responsible for developing response plans to be used in the event of a large-scale threat to the health of the residents of Fresno County. PHEP coordinates with agencies such as local hospitals, clinics, the Office of Emergency Services, Emergency Medical Services, as well as other county agencies and organizations. Some examples of public health emergencies include the following:[12]

- Avian Influenza (Bird Flu)
- Biological Agents and Diseases (Bioterrorism)
- Chemical Agents
- Emerging Infectious Diseases
- Fire Disaster Information
- Natural Disasters and Severe Weather
- Radiation Emergencies
- Power Outage

4.9.1.4 SENSITIVE RECEPTORS

Common sensitive receptors typically consist of residences, schools, day care centers, hospitals, and nursing homes. The nearest sensitive receptors to the Project site would be the residences at the MHP, which is located adjacent to Project construction areas.

4.9.2 IMPACT ANALYSIS

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

b) 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?

Less than Significant Impact. Construction of the Project would potentially require the use of various types and quantities of hazardous materials. Hazardous materials that are typically used during construction include, but are not limited to, hydraulic oil, diesel fuel, grease, lubricants, solvents, paint, asphalt, and adhesives. Although equipment used during construction activities has the potential to contain various hazardous materials, these materials would be used in accordance with the

[11] (California Department of Toxic Substances Control, 2024); (California State Waterboards, 2024)
[12] (Fresno County, 2024)

manufacturers' specifications and all applicable regulations, including California Department of Occupational Safety and Health Administration regulations regarding regular maintenance and inspection of equipment, spill prevention, and spill remediation in order to reduce the potential for incidental release of pollutants or hazardous substances on-site. Furthermore, any potential accidental hazardous materials spills during construction are the responsibility of the contractor to remediate in accordance with industry Best Management Practices (BMPs) and State and county regulations.

During Project operations, there would be the transport, storage, use, or disposal of hazardous materials. The Project would be required to continue to conform to local, State, and federal laws regarding the transport, storage, use, and disposal of hazardous materials. MCWD is required to comply with local laws and submit a Hazardous Materials Business Plan (HMBP) to the County Environmental Health Department. As the WWTP is an existing facility, MCWD's existing HMBP would suffice and would continue to be followed. Based on compliance with existing standards and requirements, impacts would be less than significant.

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

No Impact. Malaga Elementary School is the nearest school facility to the Project, located approximately 0.7 miles east. In addition, there is no publicly known information about a proposed school within a quarter-mile of the Project site. Therefore, the Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. There would be no impact.

d) Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

No Impact. The Project would not involve land that is actively listed as a hazardous materials site pursuant to Government Code Section 65962.5 and is not included on a list compiled by the DTSC. Both the SWRCB's GeoTracker and DTSC's EnviroStor websites were checked for contaminated groundwater or sites in the area and the results came up negative. There would be no impact.

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

No Impact. The Project is not located within an airport land use plan or within two miles of a public or public use airport. Therefore, there would be no impact

f) Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less than Significant Impact. Construction of the Project may require the full or partial closure of streets, or minor detours, but such effects would be temporary and would be required to comply with the California Manual on Uniform Traffic Control Devices (MUTCD) as required by a Public Works encroachment permit. Detours of traffic and exclusion of pedestrians from the work area are routinely managed by construction contractors and would be coordinated with the MHP and MCWD for work affecting the respective facilities. Therefore, the Project would not interfere with implementation of any existing or future emergency response plans or evacuation plans of the area. Impacts would be less than significant.

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

Less than Significant Impact. According to the California Department of Forestry and Fire Protection (Cal Fire), the Project site is not located in a State Responsibility Area (SRA) or a Very High Fire Hazard Severity Zone; therefore, the likelihood of a fire hazard is low. The Project would include additional WWTF infrastructure that could be impacted by a wildland fire; however, as mentioned, the likelihood for a wildland fire in the area is low. Therefore, impacts would be less than significant.

4.10 HYDROLOGY AND WATER QUALITY

Table 4-18: Hydrology and Water Quality Impacts

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
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;	☐	☐	☒	☐
ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	☐	☐	☒	☐
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	☐	☐	☒	☐
iv. impede or redirect flood flows?	☐	☐	☐	☒
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒	☐
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

4.10.1 BASELINE CONDITIONS

The nearest surface water to the project are the Central Canal which runs along the southern boundary of the WWTF, Oleander Canal along the western half of the MHP, and man-made ponds west and south of the MHP. Central Canal, Oleander Canal, and Washington Colony Canal experience variable flow most years.

Stormwater or snowmelt runoff from upland areas flows into Dog Creek, Hog Creek, Friant-Kern Canal, and Fancher Creek, which flow into Central Canal and Washington Colony Canal. The Central Canal runs south until it approaches the southeast corner of the WWTF, then it runs west along the southern border. The canal continues west and branches off into the American Colony Canal and irrigation canals. Washington

Colony Canal flows into Oleander Canal which runs south into the western freshwater pond at the MHP and continues southwest until it stops at a private residence.

MCWD is located within the North Kings Groundwater Sustainability Agency (NKGSA) The NKGSA sustainably manages the groundwater in a portion of the Kings Subbasin. The NKGSA has developed and maintained a Groundwater Sustainability Plan (GSP) to create and enforce a plan that ensures the sustainable use of groundwater, as required under the Sustainable Groundwater Management Act.

4.10.2 IMPACT ANALYSIS

a) Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Less than Significant Impact. Construction activities may result in a potential impact through the erosion of soils and the build-up of silt and debris in runoff areas; however, under California Construction General Permit (CGP) 2022-0057-DWQ guidelines, implementing a SWPPP would be required prior to construction, handling, and transportation of hazardous materials within the Project site area. The Project would involve construction activities that include trenching, grading, and excavation over an area exceeding one (1) acre. Projects that have such activities over an area of one acre must develop and implement a SWPPP. In addition, construction activities could result in accidental spills of fuels, paints, and other hazardous materials entering storm drains and other runoff areas. Through a SWPPP carried out by the contractor and a Qualified SWPPP Developer, the Project would design and utilize BMPs in order to stabilize any sedimentation and erosion from leaving the Project site. Construction would be temporary which would result in new wastewater conveyance pipeline, a new lift station, and improvements to the existing MCWD WWTF, which would result in improved effluent water quality discharged from the WWTF. Therefore, impacts would be less than significant.

b) 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?

No Impact. The consolidation Project would address the MHP WWTF's insufficient infrastructure. The Project would not require the use of water during operations, and minor amounts of water would be needed for construction and maintenance. The treatment process will be combined with the existing MCWD WWTF, therefore providing a more efficient operation, and discharging an improved effluent water quality from the WWTF. Therefore, there would be no impact.

c) 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:

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

Less than Significant Impact. Construction impacts would be minimized by following California CGP 2022-0057-DWQ guidelines and implementing a SWPPP in accordance with the SWRCB prior to construction activities beginning. Because the Project site is located on flat land, has low potential for soil erosion, and would comply with applicable SWRCB requirements such as implementation of a SWPPP, impacts related to soil and erosion pollution would be less than significant.

ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;

Less than Significant Impact. Stormwater runoff from the Project site would be directed to existing drainage basins owned and maintained by Fresno Metropolitan Flood Control District (FMFCD). Implementation of the Project would not increase the impermeability of the Project site. Impacts would be less than significant.

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

Less than Significant Impact. Existing stormwater basins in the area are planned for a runoff coefficient larger than the Project site's impermeable area. The Project would not 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. There would be a less than significant impact.

iv. impede or redirect flood flows?

No Impact. The Project is not located in a flood zone. The Project would not impede or redirect flood flows. There would be no impact.

d) Would the project in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundations?

Less than Significant Impact. The Project is not located within or near a body of water; therefore, it is not located in a tsunami or seiche zone. According to the Federal Emergency Management Agency (FEMA) Flood Map Service Center, the Project site is also slightly located in a flood hazard zone (see Figure 4-5). Any improvements would be required to be constructed above elevation to avoid impacts from potential flooding. Therefore, impacts would be less than significant.

e) Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less than Significant Impact. The Project would not involve withdrawals from an aquifer or groundwater table and would not interfere with groundwater recharge. In addition, any potential impacts to water quality have been discussed and the Project would be subject to a SWRCB National Pollutant Discharge Elimination System General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (Construction General Permit and all of its requirements. Therefore, the Project would not be in conflict with sustainable groundwater management plans such as the NKGSA GSP. Impacts would be less than significant.

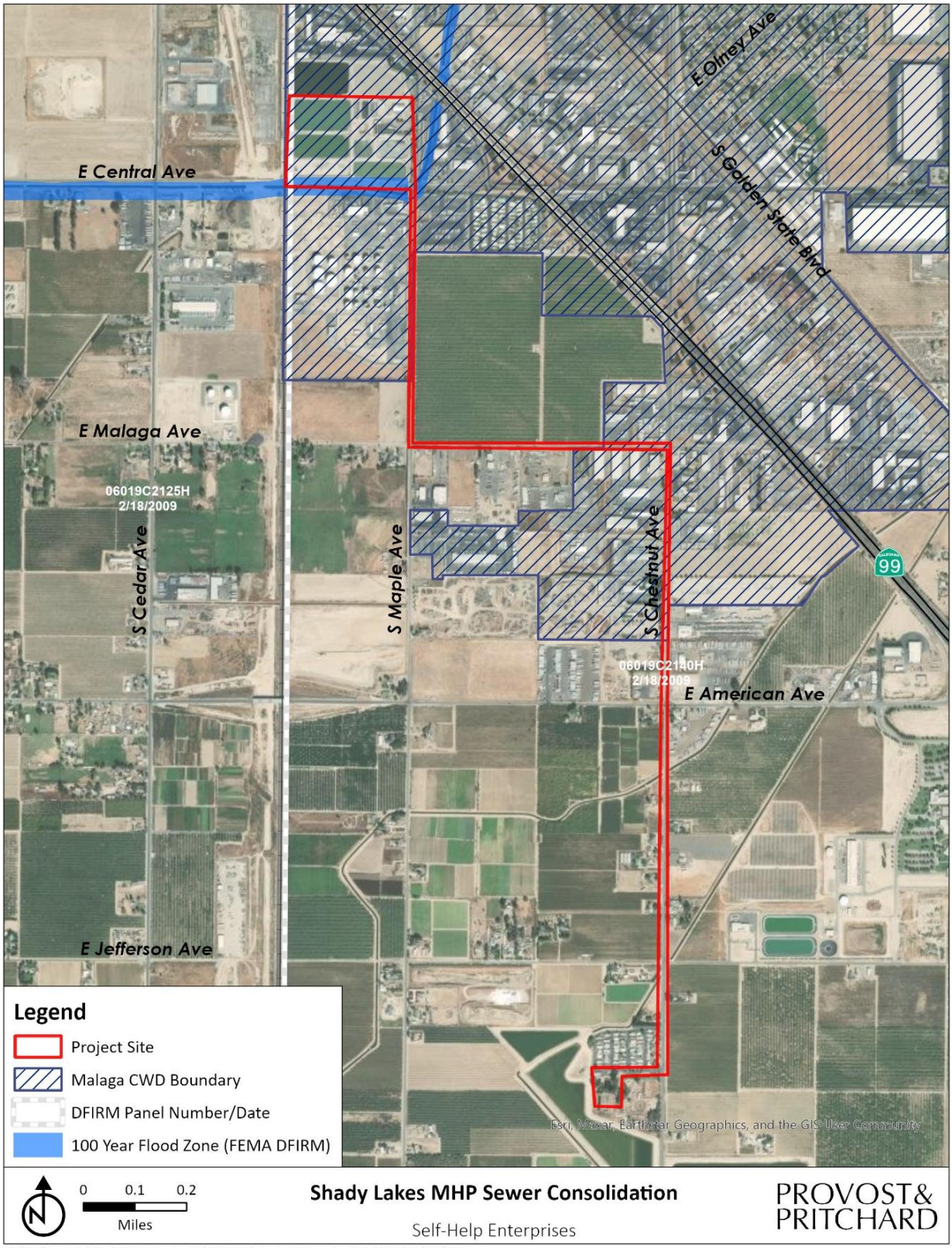


Figure 4-5: FEMA Flood Map

4.11 LAND USE AND PLANNING

Table 4-19: Land Use and Planning Impacts

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Physically divide an established community?	☐	☐	☐	☒
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?	☐	☐	☐	☒

4.11.1 BASELINE CONDITIONS

The Project is located within Fresno County. The Project site is planned for Agriculture/Open Space by the Fresno County General Plan. The Project site is zoned for Limited Agricultural (AL-20) and Exclusive Agricultural (AE-20).

4.11.2 IMPACT ANALYSIS

a) Would the project physically divide an established community?

No Impact. The Project would occur either in existing ROW, within the existing MHP, and on the MCWD WWTF. No new barriers would be constructed, and no ROW is proposed to be abandoned. Construction of the Project would require work in the existing ROW; however, it is anticipated that minor detours to allow vehicles to maneuver around active construction areas would be implemented. Impacts to the ROW would be temporary. The Project would not require the vacation or abandonment of any streets or sidewalks. Therefore, the Project would have no impact associated with the physical division of established land uses in the community. Consolidation of these sewer systems and infrastructure will benefit the Community. There would be no impact.

b) Would the project cause a significant environmental conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

No Impact. The Project would be consistent with Fresno County General Plan objectives and policies. Implementation of wastewater facilities would be allowed by-right. Therefore, there would be no impact.

4.12 MINERAL RESOURCES

Table 4-20: Mineral Resources Impacts

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☒	☐
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?	☐	☐	☐	☒

4.12.1 BASELINE CONDITIONS

The Project is located in central Fresno County, in the southern section of California's Great Valley Geomorphic Province, or Central Valley. Historically, Fresno County has been a leading producer of a variety of minerals including aggregate, fossil fuels, metals, and other materials used in construction or in industrial processes. Currently, aggregate and petroleum are the County's most significant mineral resources.

The Project is located within the Fresno production-consumption region, which spans parts of Madera and Fresno Counties. The California Geological Survey, previously known as California DOC Division of Mines and Geology, analyzed this region for the presence of aggregate resources in a 1988 mineral land classification report and a subsequent 1999 update. In each of these reports CGS classified the Fresno PC region according to the presence or absence of significant aggregate deposits. The land classification is presented in the form of Mineral Resource Zones (MRZs). As seen in Figure 7-12 of the Fresno County General Plan Background Report, most of the City of Fresno, outside of the San Joaquin and Kings River Resource Areas has an MRZ-3 designation and may contain economically recoverable mineral resources. MRZ-3 represents areas containing mineral deposits the significance of which cannot be evaluated from data available to the CGS.[13] This area includes the Project site.

4.12.2 IMPACT ANALYSIS

a) 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?

Less than Significant Impact. The Project is located in an MRZ-3 zone. The MRZ-3 zone, as discussed above, is defined as an area containing mineral deposits, the significance of which cannot be evaluated. Therefore, due to the unknown significance determination, there are no known mineral resources that would be of value to the region and residents of the State at the Project site. There would be a less than significant impact.

[13] (The County of Fresno, 2023)

b) 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?

No Impact. The Project is located in an MRZ-3 zone and is not delineated on an applicable land use plan as a locally-important mineral resource recovery site. The MRZ-3 Zone, as identified and discussed previously, is defined as an area containing mineral deposits, the significance of which cannot be evaluated. The Project site does not contain economically-viable soils, as depicted in the Biological Resources section. There are no known current or historic mineral resource extraction or recovery operations in the Project vicinity nor are there any known significant mineral resources onsite. The closest active mining operation is operated by Vulcan Materials located approximately 14.5 miles north of the Project site, at 11599 North Friant Road. There would be no impact.

4.13 NOISE

Table 4-21: Noise Impacts

Would the project result in:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
b) Generation of excessive ground borne vibration or ground borne noise levels?	☐	☐	☒	☐
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?	☐	☐	☐	☒

4.13.1 BASELINE CONDITIONS

The Project is mostly in an industrial area; however, a portion of the Project is locate at the MHP site, which contains mobile homes.

The nearest major source of transportation noise comes from the SR 99 and local roadways (Central Avenue, Malaga Avenue, and Chestnut Avenue). The nearest airport to the Project site is the Fresno Yosemite International Airport, which is located approximately 6.5 miles northeast.

Fresno County Noise Control Ordinance[14]: Chapter 8.40 of the Fresno County Municipal Code contains the Noise Control Ordinance, which places limits on noise levels and hours of construction. Section 8.40.060 states that noise sources associated with construction activities are exempt from the provisions of the Noise Control Ordinance, as long as construction does not take place before 6:00 a.m. or after 9:00 p.m. on any day except Saturday or Sunday, or before 7:00 a.m. or after 5:00 p.m. on Saturday or Sunday.

4.13.2 IMPACT ANALYSIS

a) 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 the local general plan or noise ordinance, or applicable standards of other agencies?

Less than Significant Impact. The construction phase of the Project would involve temporary noise sources, predominately from off-road equipment, such as excavators, backhoe/loaders, compactors, hauling trucks, concrete trucks, and concrete pumpers. The Project is adjacent to residences located at

[14] (Fresno County California Code of Ordinances , 1978)

the MHP. Although noise would increase in the area, this would only be during construction, and once the construction phase is over, the noise would cease. In addition, the Project would be required to comply with the Fresno County Noise Control Ordinance found in Chapter 8.40 of the Fresno Municipal Code. Operational maintenance activities would be on an as-needed basis with routine monitoring performed by existing staff and would not generate significant new noise. Any impacts would be mild and temporary and therefore, less than significant.

b) Would the project result in generation of excessive ground borne vibration or ground borne noise levels?

Less than Significant Impact. There are no federal or State standards that address construction noise or vibration. Additionally, Fresno County does not have regulations that define acceptable levels of vibration. However, the Federal Transit Administration (FTA) publication concerning noise and vibration impact assessment from transit activities has vibration standards suggestions. Although the FTA guidelines are to be applied to transit activities and construction, they may be reasonably applied to the assessment of the potential for annoyance or structural damage resulting from other activities. To prevent vibration annoyance in residences, a level of 80 VdB (vibration velocity level in dB) or less is suggested when there are fewer than 70 vibration events per day. A level of 100 VdB or less is suggested by the FTA guidelines to prevent damage to fragile buildings. Table 4-22 describes the typical construction equipment vibration levels. While these construction-related activities would result in ground borne vibration, such ground borne noise or vibration would attenuate rapidly from the source and would not be generally perceptible outside of the construction-related areas. In addition, there would not be any vibrational impacts from operation and maintenance activities.

Table 4-22. Typical Construction Equipment Vibration Sources Levels

Typical Construction Equipment Vibration Sources Levels		
Equipment	PPV at 25 ft, in/sec	Approximate Lv* at 25 ft
Large bulldozer	0.089	87
Caisson drilling	0.089	87
Loaded trucks	0.076	86
Jackhammer	0.035	79
Small bulldozer	0.003	58
*RMS velocity in decibels, VdB re 1 micro-in/sec Source: (John A. Volpe National Transportation Systems Center, 2018)		

Construction-related activities in general can have the potential to create ground borne vibrations. However, based on the soil types found in the general Project vicinity, there would not be any blasting or pile-driving in connection with construction of the Project. Therefore, the potential for ground borne vibrations to occur as part of construction-related activities of the Project would not be significant. Additionally, operation of the Project would not contain any activities that would create excessive ground borne vibrations. The Project would not result in exposure of persons to, or generation of excessive ground borne vibration or ground borne noise levels. Therefore, impacts would be less than significant.

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?

No Impact. The Project site is not located within an airport land use plan of an airport. The nearest airport is the Fresno Yosemite International Airport, located approximately 6.6 miles northwest of the Project site. The Project would not include the development of habitable structures or require the presence of permanent staff onsite. Therefore, there would be no impact.

4.14 POPULATION AND HOUSING

Table 4-23: Population and Housing Impacts

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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)?	☐	☐	☒	☐
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

4.14.1 BASELINE CONDITIONS

The MHP is a 65-space mobile home park. Using Fresno County's persons per household rate of 3.08, it is estimated that the MHP contains a population of 200 residents.[15] MCWD currently serves approximately 310 residential service connections and 297 commercial and industrial service connections. The current population is approximately 1,300.

4.14.2 IMPACT ANALYSIS

a) 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)?

Less than Significant Impact. The Project proposes the consolidation of the MHP to MCWD for sewer service. The Project would not increase capacity of the MCWD WWTF, but would increase its demand to include the 65 connections from the MHP. Therefore, the Project would not result in unplanned growth. Impacts would be less than significant.

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

No Impact. The Project would not result in the displacement of existing people or housing. No existing homes or other structures that support the housing of people would be displaced or impacted a similar manner. Therefore, there would be no impact.

[15] (United States Census Bureau, 2025)

4.15 PUBLIC SERVICES

Table 4-24: Public Services

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
i. Fire protection?	☐	☐	☒	☐
ii. Police protection?	☐	☐	☒	☐
iii. Schools?	☐	☐	☒	☐
iv. Parks?	☐	☐	☒	☐
v. Other public facilities?	☐	☐	☒	☐

4.15.1 BASELINE CONDITIONS

Fire Protection: The Project area would be served by the Fresno County Fire Department. The closest fire station is Fresno County Fire Station No. 87, located approximately 1.7 miles north.

Police Protection: Police protection is provided by the Fresno County Sheriff's Department. The closest sheriff's station is located approximately 6.3 miles northeast.

Schools: Malaga Elementary School is the nearest school facility to the Project, located approximately 0.7 miles east.

Parks: The nearest park to the Project site is Almy Park, located approximately 2.6 miles northwest.

Landfills/Waste Facility: The nearest waste facility to the Project site is the WM – Fresno Transfer Station, located approximately 1.4 miles east.

4.15.2 IMPACT ANALYSIS

a) 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 other performance objectives for any of the public services:

i. Fire Protection:

ii. Police Protection:

iii. Schools:

iv. Parks:

v. Other public facilities:

No Impact. The Project would not require new or altered governmental facilities in order to maintain acceptable service ratios, response times, or other performance objectives for public services. The Project involves the WWTF improvements in addition to the consolidation of the MHP in the MCWD. The Project would not result in unplanned population growth. There would be no impact to the listed public services.

4.16 RECREATION

Table 4-25: Recreation Impacts

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?	☐	☐	☐	☒
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☒

4.16.1 BASELINE CONDITIONS

Fresno County has several regional parks, as well as State and national parks, national forest, wilderness areas and ecological reserves. The development and maintenance of regional parks and landscaped areas is held responsible by the Fresno County Parks Division. The unincorporated areas of Fresno County have approximately 1,165 acres of parkland to serve approximately 174,200 persons. The Parks and Recreation Element of the Fresno County General Plan does not establish a standard for the number of park acres or facilities per person for these uses. The nearest park to the Project site is Almy Park, located approximately 2.6 miles west. Almy Park is considered a "neighborhood park". A neighborhood park is typically between two to ten acres and contributes to a distinct neighborhood identity.

4.16.2 IMPACT ANALYSIS

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

No Impact. The Project would provide the MHP with access to a more reliable wastewater management system provided by MCWD. The Project would not increase the amount of wastewater generated. The Project would have no impact on recreational facilities.

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

No Impact. The Project would not include recreational facilities, nor would it require additional or the expansion of recreational facilities. Therefore, there would be no impact.

4.17 TRANSPORTATION

Table 4-26: Transportation Impacts

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

4.17.1 BASELINE CONDITIONS

The Project is located in Fresno County and contains roadways maintained by Fresno County. Typically, Fresno County's roadway network is primarily rural in nature due to the large expanse of agricultural lands scattered across the County's 6,000-plus square miles. The Project site includes E. Central Avenue, S. Maple Avenue, E. American Avenue, and S. Chestnut Avenue.

4.17.2 IMPACT ANALYSIS

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

Less than Significant Impact. Construction of the Project may require the full or partial closure of streets, or minor detours, but such effects would be temporary and would be required to comply with the MUTCD as required by a Public Works encroachment permit. The Project, once constructed, would not affect any circulation system, transit, roadways, bicycle, or pedestrian facilities. Therefore, the Project would result in a less than significant impact.

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

No Impact. Section 15064.3 of the State CEQA Guidelines establishes specific considerations for evaluating a project's transportation impacts. The State CEQA Guidelines identify vehicle miles traveled (VMT), which is defined as the amount and distance of automobile travel attributable to a project, as the most appropriate measure of transportation impacts. Other relevant considerations may include the effects of a project on transit and nonmotorized travel. A temporary increase in construction related traffic would occur but said traffic would not result in permanent impacts. No structures are proposed that would permanently change the number of VMT by persons traveling the Project area. The Project proposes improvements to the existing WWTP, along with the consolidation of a small community to receive wastewater collection and treatment services. The Project element would not result in an

increase in VMT. The Project would not be inconsistent or conflict with CEQA Guidelines section 15064.3 subdivision (b). There would be no impact.

c) 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)?

No Impact. The Project would not propose any off-site improvements to the local transportation network that would result in sharp curves, dangerous intersections, or other hazards. Since the Project is compatible with surrounding land uses, there are no off-site improvements, and all on-site improvements would be made adhering to the latest design standards for the County of Fresno, preventing hazardous conditions. There would be no impact.

d) Would the project result in inadequate emergency access?

Less than Significant Impact. The Project would not involve a change to any emergency response plans. Construction of the Project would require work in the existing ROW; however, it is anticipated that minor detours to allow vehicles to maneuver around active construction areas, or partial/full road closures would be implemented temporarily. Work in the ROW would require preparation of and compliance with a Traffic Control Plan prepared in accordance with the CA MUTCD. As such, there would be a less than significant impact.

4.18 TRIBAL CULTURAL RESOURCES

Table 4-27: Tribal Cultural Resources Impacts

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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:				
i. Listed or eligible for listing in the California Register of Historical Resources, or in the local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☐	☒	☐	☐
ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐

4.18.1 BASELINE CONDITIONS

The Project site is in the Southern Valley Yokuts ethnographic territory of the San Joaquin Valley. Within California, the Yokuts were generally divided into three major groups, the Northern Valley Yokuts, the Southern Valley Yokuts, and the Foothill Yokuts. The Yokuts are a sub-group of the Penutian language that covers much of coastal and central California and Oregon.

4.18.1.1 ASSEMBLY BILL 52

PRC Section 21080.3.1, et seq. (codification of AB 52, 2013-14) requires that a lead agency, within 14 days of determining that it would undertake a project, must notify in writing any California Native American Tribe traditionally and culturally affiliated with the geographic area of the project if that Tribe has previously requested notification about projects in that geographic area. The notice must briefly describe the project and inquire whether the Tribe wishes to initiate request formal consultation. Tribes have 30 days from receipt of notification to request formal consultation. The lead agency then has 30 days to initiate the consultation, which then continues until the parties come to an agreement regarding necessary mitigation or agree that no mitigation is needed, or one or both parties determine that negotiation occurred in good faith, but no agreement would be made. As of the date of this report, MCWD has not received any written

correspondence from a Tribe pursuant to Public Resources Code Section 21080.3.1 requesting notification of a proposed project.

4.18.2 IMPACT ASSESSMENT

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

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

vii. 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 Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Less than Significant Impact with Mitigation Incorporated. A search of the NAHC SLF was completed for the Project site. No tribal cultural resources were identified. Additionally, a records search was conducted at the SSJVIC, California State University, Bakersfield. This search also determined that tribal cultural resources were not present on-site.

The District, as a public lead agency, has not received any written correspondence from a Tribe pursuant to Public Resources Code Section 21080.3.1 requesting notification of a proposed project.

It is unlikely that the Project has the potential to result in significant impacts or adverse effects to any known unknown cultural or historical resources, such as archaeological remains, artifacts or historic properties or structures. However, in the improbable event that unknown cultural resources are encountered during proposed Project construction, implementation of mitigation measures CUL-1 and CUL-2, described in Section 4.5.3 are recommended in the event cultural materials or human remains are unearthed during excavation or construction. Implementation of mitigation measures referenced above will reduce impacts to tribal cultural resources to less than significant.

4.18.3 MITIGATION

See Section 4.5.3.

4.19 UTILITIES AND SERVICE SYSTEMS

Table 4-28: Utilities and Service Systems Impacts

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 storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☐	☒
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?	☐	☐	☒	☐
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☐	☒

4.19.1 BASELINE CONDITIONS

The Project site is located in the County of Fresno. The site where the MCWD WWTF is located within the boundaries of MCWD. The MHP is not located within a special district boundary and is reliant on private infrastructure for water and sewer services. MCWD provides water and wastewater services to the landowners within its service area. Electricity services are provided by PG&E. Solid waste is provided by MCWD to those within its service area. The MHP receives solid waste services from Fresno County.

4.19.2 IMPACT ANALYSIS

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

Less than Significant Impact. The Project's primary purpose is to construct improvements to the existing MCWD WWTF to better serve its existing demand, in addition to the proposed to be consolidated MHP. The Project would not require the construction of new water or wastewater treatment facilities or the expansion of existing facilities. The Project has been analyzed in this IS/MND and has been found to not

result in any significant or potentially significant impacts. Therefore, impacts would be less than significant.

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

Less than Significant Impact. The Project involves improvements to the existing MCWD WWTF to better serve its existing demand, in addition to the proposed to be consolidated MHP. The Project would not propose any uses that would create additional demand for domestic water. Therefore, the Project would have sufficient water supplies. Impacts would be less than significant.

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

No Impact. The Project involves improvements to the existing MCWD WWTF to better serve its existing demand, in addition to the proposed to be consolidated MHP. The Project itself would not generate wastewater but would increase the ability to manage and treat wastewater generated from MCWD's service area. Therefore, there would be no impact.

d) 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?

Less than Significant Impact. The construction phase of the Project would generate solid waste in the form of construction debris. However, the Project would comply with Section 5.408 of the California Green Building Standards Code, which requires a minimum of 65% of nonhazardous construction and demolition waste be recycled and/or salvaged for reuse. The operational phase of the Project would continue to produce biosolids, which are transferred to a Fresno County recycling and waste facility after treatment. The Project involves improvements to an existing WWTF in order to meet existing and planned capacity. Furthermore, operations would not require additional staffing or maintenance, and therefore solid waste associated with employees and vendors onsite would be unchanged from existing conditions. Any Project-related impacts associated with landfill capacity and solid waste disposal would be less than significant.

e) Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

No Impact. The Project would continue to comply with all federal, State, and local statutes and regulations related to solid waste. Therefore, there would be no impact.

4.20 WILDFIRE

Table 4-29: Wildfire Impacts

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrollable spread of wildfire?	☐	☐	☐	☒
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?	☐	☐	☐	☒
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?	☐	☐	☐	☒

4.20.1 BASELINE CONDITIONS

The Project is located in unincorporated Fresno County south of the City of Fresno's city limits. While the Project is not in an incorporated area, the Project site is located in a rural area with little development.

According to CalFire, the Project is not located within an SRA, meaning CalFire does not assume responsibility for wildfire prevention and protection – the local service provider, Fresno County Fire Protection does.[16] According to CalFire, the Project area is not located within a Very High Fire Hazard Severity Zone. The nearest very high fire hazard severity zone can be found approximately 28 miles northeast near Hog Mountain.[17]

4.20.2 IMPACT ANALYSIS

a) 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?

b) 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

[16] (California Department of Forestry and Fire Protection, 2023)
[17] (ArcGIS, 2023)

thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

c) 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?

d) 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?

No Impact. The Project area is located in a section of Fresno County that has not been designated as either a Very High Fire Hazard Severity Zone or an SRA. Therefore, further analysis is not required and there would be no impact related to wildfires.

4.21 CEQA MANDATORY FINDINGS OF SIGNIFICANCE

Table 4-30: CEQA Mandatory Findings of Significance

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

4.21.1 STATEMENT OF FINDINGS

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

Less than Significant Impact with Mitigation Incorporated. The analysis conducted in this IS/MND results in a determination that the Project, with incorporation of mitigation measures, would have a less than significant effect on the environment. The potential for impacts to biological resources, cultural resources, and tribal cultural resources from the implementation of the Project would be less than significant with the incorporation of the mitigation measures discussed in Chapter 5 Mitigation, Monitoring, and Reporting Program. Accordingly, the Project would involve no potential for significant impacts through the degradation of the quality of the environment, the reduction in the habitat or population of fish or wildlife, including endangered plants or animals, the elimination of a plant or animal community or example of a major period of California history or prehistory.

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

Less than Significant Impact. CEQA Guidelines Section 15064(i) States that a Lead Agency shall consider whether the cumulative impact of a project is significant and whether the effects of the project are cumulatively considerable. The assessment of the significance of the cumulative effects of a project must, therefore, be conducted in connection with the effects of past projects, other current projects, and probable future projects. The Project involves improvements to an existing WWTF, demolition/decommission of facilities of another WWTF, and the consolidation of a MHP into the MCWD for wastewater collection and treatment services. No additional roads would be constructed as a result of the Project, nor would any additional public services be required. The Project is intended to improve the municipal wastewater treatment process and would not result in direct or indirect population growth. Therefore, implementation of the Project would not result in significant cumulative impacts and all potential impacts would be reduced to less than significant through the implementation of mitigation measures and basic regulatory requirements incorporated into future Project design.

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

Less than Significant Impact. The Project would ultimately provide the MHP with reliable wastewater collection and treatment services. In doing so, MCWD would require upgrades to its WWTF to support the addition of the MHP. The Project in and of itself would not create a significant hazard to the public or the environment. On the contrary, implementation of the Project would improve the quality of effluent discharged and would mitigate odors associated with the wastewater treatment process. Construction-related air quality/dust exposure impacts could occur temporarily as a result of construction. However, implementation of basic regulatory requirements identified in this IS/MND would ensure that impacts are less than significant. Therefore, the Project would not have any direct or indirect adverse impacts on humans. This impact would be less than significant.

CHAPTER 5 MITIGATION, MONITORING, AND REPORTING PROGRAM

This Mitigation Monitoring and Reporting Program (MMRP) has been formulated based upon the findings of the Initial Study/Mitigated Negative Declaration (IS/MND) for the Project in Fresno County. The MMRP lists mitigation measures recommended in the IS/MND for the Project and identifies monitoring and reporting requirements.

Table 5-1: Mitigation, Monitoring, and Reporting Program presents the mitigation measures identified for the Project. Each mitigation measure is numbered with a symbol indicating the topical section to which it pertains, a hyphen, and the impact number. For example, AIR-2 would be the second mitigation measure identified in the Air Quality analysis of the IS/MND.

The first column of Table 5-1: Mitigation, Monitoring, and Reporting Program identifies the mitigation measure. The second column, entitled "When Monitoring is to Occur," identifies the time the mitigation measure should be initiated. The third column, "Frequency of Monitoring," identifies the frequency of the monitoring of the mitigation measure. The fourth column, "Agency Responsible for Monitoring," names the party ultimately responsible for ensuring that the mitigation measure is implemented. The last columns will be used by the Lead and Responsible Agencies to ensure that individual mitigation measures have been complied with and monitored.

Table 5-1: Mitigation, Monitoring, and Reporting Program

Mitigation, Monitoring, and Reporting Program						
Item	Mitigation Measure	When Monitoring is to Occur	Frequency of Monitoring	Agency Responsible for Monitoring	Method to Verify Compliance	Verification of Compliance
Biological Resources						
General Project-Related Impacts						
BIO-1	**(*WEAP Training*):** Prior to initiating construction activities (including staging and mobilization), all personnel associated with project construction will attend a mandatory Worker Environmental Awareness Program (WEAP) training, conducted by a qualified biologist (someone familiar with the identification and habitats of these species), to aid workers in identifying special status resources that may occur in the Project site. The specifics of this program will include identification of the sensitive species and suitable habitats, a description of the regulatory status and general ecological characteristics of sensitive resources, and review of the limits of construction and mitigation measures required to reduce impacts to biological resources within the work area. This training will discuss special status species, describe the laws and regulations in place to provide protection of these species, identify the penalties for violation of applicable environmental laws and regulations, and include a list of required protective measures to avoid "take." A fact sheet summarizing this information, along with photographs or illustrations of sensitive species with potential to occur on the Project site, will also be prepared for distribution to all contractors, their employees, and all other personnel involved with construction of the project. All trainees will sign a form documenting that they have	Prior to the start of any construction activities	As needed for any new construction personnel during construction activities	MCWD with assistance of a qualified biological subconsultant	Report	

Mitigation, Monitoring, and Reporting Program						
Item	Mitigation Measure	When Monitoring is to Occur	Frequency of Monitoring	Agency Responsible for Monitoring	Method to Verify Compliance	Verification of Compliance
	attended WEAP training and understand the information presented to them.					
BIO-2	***(BMPs):*** The Project proponent will require that all workers employ the following BMPs in order to avoid and minimize potential impacts to special status species: • Vehicles will observe a 15-mph speed limit while on unpaved access routes. • All open trenches, holes, sumps, and other excavations greater than 6-inches with sidewalls steeper than a 1:1 (45 degree) slope will have an escape ramp of earth or a non-slip material with a less than 1:1 slope or these will be covered with barrier material such that animals are unable to dig or squeeze under the barrier and become entrapped. • Workers will inspect areas beneath parked vehicles, equipment, and materials prior to mobilization. If special status species are detected, the individual will either be allowed to leave of its own volition or will be captured by the qualified biologist (must possess appropriate collecting/handling permits) and relocated out of harm's way to the nearest suitable habitat beyond the influence of the project work area. "Take" of a state or federal special status (rare, California Species of Special Concern, threatened, or endangered) species is prohibited without the	Prior to the start of any construction activities	During Construction	MCWD	Report	

Mitigation, Monitoring, and Reporting Program						
Item	Mitigation Measure	When Monitoring is to Occur	Frequency of Monitoring	Agency Responsible for Monitoring	Method to Verify Compliance	Verification of Compliance
	necessary federal or state take permit(s). • The presence of any special status species will be reported to the project's qualified biologist, who will submit the occurrence to the CNDDB. If necessary, the biologist will report the occurrence to CDFW and/or USFWS.					
Project-Related Mortality and/or Nest Abandonment of Migratory Birds, Raptors, and Special Status Birds						
BIO-3	**(*Avoidance*):** The project's construction activities will occur, if feasible, between September 16 and January 31 (outside of the nesting bird season) to avoid impacts to nesting birds.	September 16 to January 31	Once, as determined by qualified biologist during construction activities	MCWD with assistance of a qualified biological subconsultant	Report	
BIO-4	**(*Pre-construction Surveys*):** If activities must occur within nesting bird season (February 1 to September 15), a qualified biologist will conduct a one-time take avoidance survey for Swainson's hawk nests onsite and within a 0.5-mile radius within ten (10) calendar days prior to the start of construction. This survey will be conducted in accordance with the *Recommended Timing and Methodology for Swainson's Hawk Nesting Surveys in California's Central Valley* (Swainson's Hawk Technical Advisory Committee, 2000), or current guidance. The survey would also include inspecting for nesting migratory birds within up to 50 feet outside of the Project site and for other nesting raptors within up to 450 feet outside of the Project site. All raptor nests would be considered "active" upon the nest-building stage. If no active nests are observed, no further mitigation is required. If construction is delayed or halted for more than ten (10)	Ten (10) days prior to the start of construction activities	Once, as determined by qualified biologist during construction activities	MCWD with assistance of a qualified biological subconsultant	Report	

Mitigation, Monitoring, and Reporting Program						
Item	Mitigation Measure	When Monitoring is to Occur	Frequency of Monitoring	Agency Responsible for Monitoring	Method to Verify Compliance	Verification of Compliance
	days, another pre-construction survey for nesting birds will be conducted.					
BIO-5	(***Avoidance Buffers***)**:** On discovery of any active nests or breeding colonies near work areas, a qualified biologist will determine appropriate avoidance buffer distances based on applicable CDFW and/or USFWS guidelines, the biology of the species, conditions of the nest(s), and the level of project disturbance.	Upon discovery of any active nests or breeding colonies	Once, as determined by qualified biologist during construction activities	MCWD with assistance of a qualified biological subconsultant	Report	
Project-Related Mortality and/or Disturbance to Burrowing Owl						
BIO-6	(***Pre-construction Take Avoidance Survey***)**:** A qualified biologist (someone familiar with the identification and sign of this species) will conduct a pre-construction take avoidance survey for BUOW and suitable burrows, in accordance with CDFW's *Staff Report on Burrowing Owl Mitigation* (2012), within seven (7) days prior to the start of construction activities. The survey will include the proposed work area and accessible surrounding land up to 500 feet. If construction is delayed or halted for more than seven (7) days, another pre-construction survey for BUOW will be conducted. If no BUOW individuals or active burrows are observed, no further mitigation is required.	Seven (7) days prior to the start of construction activities	Once, as determined by qualified biologist during construction activities	MCWD with assistance of a qualified biological subconsultant	Report	
BIO-7	(***Avoidance***)**:** If an active BUOW burrow is detected, avoidance buffers will be implemented. A qualified biologist will determine appropriate avoidance buffer distances based on CDFW's 2012 *Staff Report on Burrowing Owl Mitigation*, the biology of BUOW, conditions of the burrow(s), and the level of project disturbance. If necessary, avoidance buffers will be identified with flagging, fencing, or	Upon discovery of active BUOW burrow	Once, as determined by qualified biologist during construction activities	MCWD with assistance of a qualified biological subconsultant	Report	

Mitigation, Monitoring, and Reporting Program						
Item	Mitigation Measure	When Monitoring is to Occur	Frequency of Monitoring	Agency Responsible for Monitoring	Method to Verify Compliance	Verification of Compliance
	other easily visible means, and will be maintained until the biologist has determined that the nestlings have fledged and all BUOW have left the project area. **Level of Disturbance** **Location** / **Location** / **Location** / **Location** / **Location** Nesting sites / Nesting sites / Nesting sites / Nesting sites / Nesting sites Nesting sites / Nesting sites / Nesting sites / Nesting sites / Nesting sites Nesting sites / Nesting sites / Nesting sites / Nesting sites / Nesting sites					
BIO-8	(***ITP* and *Passive Relocation*):** If an active BUOW burrow is detected within the proposed work area and cannot be avoided, it is recommended the project obtain an Incidental Take Permit (ITP) in order to implement protection plans and/or relocation plans in consultation with CDFW and/or USFWS and protect the project from "take" of this species.	Upon discovery of active BUOW burrow	Once, as determined by qualified biologist during construction activities	MCWD with assistance of a qualified biological subconsultant	Report	
Project-Related Mortality and/or Disturbance to Northwestern Pond Turtle						
BIO-9	(***Pre-construction Survey and Avoidance Buffers*):** Within seven (7) days prior to the start of construction, a qualified biologist (someone familiar with the identification and habitat of this species) will conduct a pre-construction survey for northwestern pond turtle within the Project site and surrounding areas up to 330 feet. Pre-construction surveys will be conducted in accordance with the draft *Western Pond Turtle (Emys marmorata) Visual Survey Protocol for the Southcoast Ecoregion* (United States Geological Survey, 2006), or current guidance. If no northwestern pond turtles are observed during the pre-construction survey, then construction activities may begin. If construction is delayed or halted for more than seven (7)	Seven (7) days prior to the start of construction activities	Once, as determined by qualified biologist during construction activities	MCWD with assistance of a qualified biological subconsultant	Report	

Mitigation, Monitoring, and Reporting Program						
Item	Mitigation Measure	When Monitoring is to Occur	Frequency of Monitoring	Agency Responsible for Monitoring	Method to Verify Compliance	Verification of Compliance
	days, another pre-construction survey for northwestern pond turtle will be conducted. If the surveys results in the identification of a northwestern pond turtle or an individual is found on the Project site during construction activities, it will be allowed to leave the Project site on its own and the qualified biologist will determine appropriate buffers to be implemented to avoid impacts to the individual.					
BIO-10	(*Monitor*): If northwestern pond turtles are observed on the Project site, a qualified biologist will conduct a pre-activity clearance survey each day and remain on the Project site to oversee all vegetation clearing and ground disturbing activities until the individual(s) have left the Project site.	Upon discover of northwestern pond turtles	Once, as determined by qualified biologist during construction activities	MCWD with assistance of a qualified biological subconsultant	Report	
BIO-11	(*Formal Consultation*): Should northwestern pond turtles get listed in this area and the project/qualified biologist needs to move an individual, consultation for protection plans and/or relocation plans with the appropriate agencies will be completed to avoid take.	During construction activities	Once, as determined by qualified biologist during construction activities	MCWD with assistance of a qualified biological subconsultant	Report	
Project-Related Impacts to Wildlife Movement Corridors and Native Wildlife Nursery Sites						
BIO-12	(*Permits*): If the project intends to impact jurisdictional waters, permits with USACE, RWQCB, and/or CDFW will be obtained to comply with state and federal regulations, if necessary. These permits, certifications, and agreements would ensure impacts to waters are minimized to the extent possible and permanent impacts would be offset by compensatory mitigation.	Prior to construction activities	Once, as determined by qualified biologist during construction activities	MCWD with assistance of a qualified biological subconsultant	Report	
Cultural Resources						
CUL-1	(Archaeological Remains): If previously unidentified archaeological remains are encountered during development or	Daily during construction activities	Continuously	MCWD	Report	

Mitigation, Monitoring, and Reporting Program						
Item	Mitigation Measure	When Monitoring is to Occur	Frequency of Monitoring	Agency Responsible for Monitoring	Method to Verify Compliance	Verification of Compliance
	ground-moving activities in the Project site, all work should be halted until a qualified archaeologist can identify the discovery and assess its significance. In the event of accidental discovery of unidentified archaeological remains during development or ground-moving activities in the Project site, all work shall be halted in the immediate vicinity until a qualified archaeologist can identify the discovery and assess its significance.					
CUL-2	**(Human Remains):** If human remains are uncovered during construction, the Fresno County Coroner is to be notified to investigate the remains and arrange proper treatment and disposition. If the remains are identified on the basis of archaeological context, age, cultural associations, or biological traits to be those of a Native American, California Health and Safety Code 7050.5 and PRC 5097.98 require that the coroner notify the NAHC within 24 hours of discovery. The NAHC will then identify the Most Likely Descendent who will be afforded an opportunity to make recommendations regarding the treatment and disposition of the remains.	Daily during construction activities	Continuously	MCWD	Report	
Cultural Resources						
GEO-1	Should paleontological resources be encountered on the Project site, all ground disturbing activities in the area shall stop. A qualified paleontologist shall be contacted to assess the discovery. Mitigation may include monitoring, recording the fossil locality, data recovery and analysis, and preparing a final report. Public educational outreach may also be appropriate. Upon completion of the assessment, a report documenting methods,	Daily during construction activities	Continuously	MCWD	Report	

Mitigation, Monitoring, and Reporting Program						
Item	Mitigation Measure	When Monitoring is to Occur	Frequency of Monitoring	Agency Responsible for Monitoring	Method to Verify Compliance	Verification of Compliance
	findings, and recommendations shall be prepared and submitted to Fresno County for review, and (if paleontological materials are recovered) a paleontological repository, such as the University of California Museum of Paleontology					
Tribal Cultural Resources						
See Section 4.5.3.						

CHAPTER 6 REFERENCES

ArcGIS. (2023). *Is Your Home in a Fire Hazard Severity Zone?* Retrieved from https://www.arcgis.com/apps/Styler/index.html?appid=5e96315793d445419b6c96f89ce5d153

California Department of Conservation. (2002). *California Geomorphic Provinces Note 36.* Retrieved from https://www.conservation.ca.gov/cgs/Documents/Publications/CGS-Notes/CGS-Note-36.pdf

California Department of Conservation. (2023). *Earthquake Zones of Required Investigation*. Retrieved from https://maps.conservation.ca.gov/cgs/EQZApp/app/

California Department of Forestry and Fire Protection. (2023). *California State Responsibility Areas*. Retrieved from https://www.arcgis.com/apps/mapviewer/index.html?layers=5ac1dae3cb2544629a845d9a19e83991

California Department of Toxic Substances Control. (2024). *California Department of Toxic Substances Control EnviroStor*. Retrieved from California Department of Toxic Substances Control EnviroStor: https://www.envirostor.dtsc.ca.gov/public/

California Department of Transportation. (2023). *California State Scenic Highway System Map*. Retrieved October 28, 2022, from California Department of Transportation Scenic Highways: https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa

California Department of Water Resources. (2022). *Dam Breach Inundation Map Web Publisher*. Retrieved from Dam Breach Inundation Map Web Publisher: https://fmds.water.ca.gov/webgis/?appid=dam_prototype_v2

California State Waterboards. (2024). *GeoTracker*. Retrieved from https://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=Sacramento

Fresno County. (2024). *Public Health Emergency Preparedness*. Retrieved from https://www.fresnocountyca.gov/Departments/Public-Health/Emergency-Services/Public-Health-Emergency-Preparedness-PHEP

Fresno County California Code of Ordinances . (1978). *Fresno County California Code of Ordinances Title 8*. Retrieved from Fresno County California Code of Ordinances Title 8, Chapter 8.40 Noise Control: https://library.municode.com/ca/fresno_county/codes/code_of_ordinances?nodeId=TIT8HESA_CH8.40NOCO

John A. Volpe National Transportation Systems Center. (2018). *FTA Transit Noise and Vibration Impact Assessment Manual* . Retrieved from https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf

Pacific Gas & Electric Company. (2024, November). *Service Area Map*. Retrieved from https://www.pge.com/tariffs/assets/pdf/tariffbook/ELEC_MAPS_Service%20Area%20Map.pdf

San Joaquin Valley Air Pollution Control District. (2012). *Air Quality Attainment Plans*. Retrieved June 4, 2024, from https://ww2.valleyair.org/rules-and-planning/air-quality-plans/

Swainson's Hawk Technical Advisory Committee. (2000, May). *Recommended Timing and Methodology for Swainson's Hawk Nesting Surveys in California's Central Valley.* Retrieved January 2025

The County of Fresno. (2023). *Fresno County General Plan Background Report.* Retrieved from https://www.fresnocountyca.gov/files/sharedassets/county/v/2/public-works-and-planning/development-services/planning-and-land-use/general-plan/fcgpr-background-report-2023-05-10.pdf

The National Oceanic and Atmospheric Administration. (2025). *AgACIS Climate Data Retrieval*. Retrieved from https://agacis.rcc-acis.org/

United States Census Bureau. (2025). *Quick Facts Fresno County, CA*. Retrieved January 30, 2024, from United States Census Bureau: https://www.census.gov/quickfacts/fact/table/fresnocountycalifornia/PST045222

United States Geological Survey. (2006). United States Geological Survey Western Pond Turtle (Emys marmorata) Visual Survey Protocol for the Southcoast Ecoregion. Retrieved January 2025, from https://sdmmp.com/upload/SDMMP_Repository/0/4fnpv18xm0sqtw29j7d3rz56bkychg.pdf

APPENDICES

Appendix A: CalEEMod and HARP2 Air Dispersion Output Files

Comunidad Nuevo Lago MHP Sewer Custom Report

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1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	Shady Lakes MHP Sewer
Construction Start Date	1/1/2026
Lead Agency	—
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	2.70
Precipitation (days)	25.4
Location	5665 S Chestnut Ave, Fresno, CA 93725, USA
County	Fresno
City	Unincorporated
Air District	San Joaquin Valley APCD
Air Basin	San Joaquin Valley
TAZ	2489
EDFZ	5
Electric Utility	Pacific Gas & Electric Company
Gas Utility	Pacific Gas & Electric
App Version	2022.1.1.29

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
User Defined Linear	2.20	Mile	17.0	0.00	—	—	—	—
Other Non-Asphalt Surfaces	30.0	Acre	30.0	0.00	0.00	0.00	—	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

2. Emissions Summary

2.1. Construction Emissions Compared Against Thresholds

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

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	3.16	3.02	10.6	13.5	0.02	0.39	0.08	0.42	0.36	0.02	0.37	—	2,454	2,454	0.10	0.02	0.28	2,463
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	9.23	9.20	15.7	18.7	0.03	0.66	7.16	7.82	0.61	3.44	4.05	—	3,141	3,141	0.13	0.03	0.01	3,153
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.81	1.69	7.89	9.77	0.02	0.30	0.20	0.50	0.28	0.08	0.36	—	1,756	1,756	0.07	0.02	0.04	1,762
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.33	0.31	1.44	1.78	< 0.005	0.05	0.04	0.09	0.05	0.02	0.07	—	291	291	0.01	< 0.005	0.01	292

2.2. Construction Emissions by Year, Unmitigated

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

Year	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	1.42	1.19	10.6	13.5	0.02	0.39	0.03	0.42	0.36	0.01	0.36	—	2,454	2,454	0.10	0.02	0.10	2,463

2027	3.16	3.02	10.00	13.2	0.02	0.39	0.08	0.42	0.36	0.02	0.37	—	2,453	2,453	0.10	0.02	0.28	2,462
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	2.11	1.78	15.7	18.7	0.03	0.66	7.16	7.82	0.61	3.44	4.05	—	3,141	3,141	0.13	0.03	0.01	3,153
2027	9.23	9.20	9.47	13.1	0.02	0.34	0.08	0.38	0.31	0.02	0.32	—	2,450	2,450	0.10	0.02	0.01	2,459
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	1.07	0.90	7.89	9.77	0.02	0.30	0.20	0.50	0.28	0.08	0.36	—	1,756	1,756	0.07	0.02	0.04	1,762
2027	1.81	1.69	5.14	6.81	0.01	0.19	0.01	0.20	0.18	< 0.005	0.18	—	1,262	1,262	0.05	0.01	0.02	1,266
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	0.20	0.16	1.44	1.78	< 0.005	0.05	0.04	0.09	0.05	0.02	0.07	—	291	291	0.01	< 0.005	0.01	292
2027	0.33	0.31	0.94	1.24	< 0.005	0.03	< 0.005	0.04	0.03	< 0.005	0.03	—	209	209	0.01	< 0.005	< 0.005	210

3. Construction Emissions Details

3.1. Demolition (2026) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.77	1.48	12.5	12.2	0.02	0.50	—	0.50	0.46	—	0.46	—	2,042	2,042	0.08	0.02	—	2,049
Demolition	—	—	—	—	—	—	0.00	0.00	—	0.00	0.00	—	—	—	—	—	—	—

Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.19	0.16	1.37	1.34	< 0.005	0.06	—	0.06	0.05	—	0.05	—	224	224	0.01	< 0.005	—	225
Demolition	—	—	—	—	—	—	0.00	0.00	—	0.00	0.00	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.04	0.03	0.25	0.24	< 0.005	0.01	—	0.01	0.01	—	0.01	—	37.1	37.1	< 0.005	< 0.005	—	37.2
Demolition	—	—	—	—	—	—	0.00	0.00	—	0.00	0.00	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.05	0.04	0.03	0.35	0.00	0.00	0.07	0.07	0.00	0.02	0.02	—	65.9	65.9	< 0.005	< 0.005	0.01	66.9
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	< 0.005	< 0.005	0.04	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	7.48	7.48	< 0.005	< 0.005	0.01	7.60
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.24	1.24	< 0.005	< 0.005	< 0.005	1.26
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.3. Site Preparation (2026) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.12	0.94	8.24	9.53	0.02	0.36	—	0.36	0.33	—	0.33	—	2,228	2,228	0.09	0.02	—	2,235
Dust From Material Movement	—	—	—	—	—	—	1.59	1.59	—	0.17	0.17	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.09	0.10	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	24.4	24.4	< 0.005	< 0.005	—	24.5

Dust From Material Movement	—	—	—	—	—	—	0.02	0.02	—	< 0.005	< 0.005	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.02	0.02	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	4.04	4.04	< 0.005	< 0.005	—	4.06
Dust From Material Movement	—	—	—	—	—	—	< 0.005	< 0.005	—	< 0.005	< 0.005	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.03	0.02	0.21	0.00	0.00	0.04	0.04	0.00	0.01	0.01	—	39.5	39.5	< 0.005	< 0.005	< 0.005	40.1
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.45	0.45	< 0.005	< 0.005	< 0.005	0.46
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.07	0.07	< 0.005	< 0.005	< 0.005	0.08

Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.5. Grading (2026) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.73	1.45	13.1	14.5	0.02	0.59	—	0.59	0.54	—	0.54	—	2,528	2,528	0.10	0.02	—	2,536
Dust From Material Movement	—	—	—	—	—	—	7.08	7.08	—	3.42	3.42	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.04	0.03	0.29	0.32	< 0.005	0.01	—	0.01	0.01	—	0.01	—	55.4	55.4	< 0.005	< 0.005	—	55.6
Dust From Material Movement	—	—	—	—	—	—	0.16	0.16	—	0.08	0.08	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.05	0.06	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	9.17	9.17	< 0.005	< 0.005	—	9.20
Dust From Material Movement	—	—	—	—	—	—	0.03	0.03	—	0.01	0.01	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.04	0.04	0.03	0.28	0.00	0.00	0.05	0.05	0.00	0.01	0.01	—	52.7	52.7	< 0.005	< 0.005	0.01	53.5
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.20	1.20	< 0.005	< 0.005	< 0.005	1.22
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.20	0.20	< 0.005	< 0.005	< 0.005	0.20
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.7. Building Construction (2026) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.07	0.89	8.05	9.63	0.02	0.32	—	0.32	0.29	—	0.29	—	1,889	1,889	0.08	0.02	—	1,896
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.07	0.89	8.05	9.63	0.02	0.32	—	0.32	0.29	—	0.29	—	1,889	1,889	0.08	0.02	—	1,896
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.61	0.51	4.61	5.52	0.01	0.18	—	0.18	0.17	—	0.17	—	1,083	1,083	0.04	0.01	—	1,087
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.11	0.09	0.84	1.01	< 0.005	0.03	—	0.03	0.03	—	0.03	—	179	179	0.01	< 0.005	—	180
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.9. Building Construction (2027) - Unmitigated

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

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

Off-Road	1.03	0.86	7.66	9.59	0.02	0.28	—	0.28	0.26	—	0.26	—	1,889	1,889	0.08	0.02	—	1,896
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.03	0.86	7.66	9.59	0.02	0.28	—	0.28	0.26	—	0.26	—	1,889	1,889	0.08	0.02	—	1,896
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.54	0.45	4.00	5.01	0.01	0.15	—	0.15	0.14	—	0.14	—	987	987	0.04	0.01	—	990
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.10	0.08	0.73	0.91	< 0.005	0.03	—	0.03	0.02	—	0.02	—	163	163	0.01	< 0.005	—	164
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.11. Paving (2027) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.88	0.74	6.94	9.95	0.01	0.30	—	0.30	0.27	—	0.27	—	1,511	1,511	0.06	0.01	—	1,516
Paving	2.23	2.23	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.88	0.74	6.94	9.95	0.01	0.30	—	0.30	0.27	—	0.27	—	1,511	1,511	0.06	0.01	—	1,516
Paving	2.23	2.23	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.05	0.04	0.38	0.55	< 0.005	0.02	—	0.02	0.02	—	0.02	—	82.8	82.8	< 0.005	< 0.005	—	83.1
Paving	0.12	0.12	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.07	0.10	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	13.7	13.7	< 0.005	< 0.005	—	13.8
Paving	0.02	0.02	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.06	0.03	0.47	0.00	0.00	0.08	0.08	0.00	0.02	0.02	—	87.2	87.2	< 0.005	< 0.005	0.28	88.6
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.05	0.05	0.03	0.39	0.00	0.00	0.08	0.08	0.00	0.02	0.02	—	77.4	77.4	< 0.005	< 0.005	0.01	78.7
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	4.39	4.39	< 0.005	< 0.005	0.01	4.47
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.73	0.73	< 0.005	< 0.005	< 0.005	0.74
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.13. Architectural Coating (2027) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.14	0.11	0.83	1.13	< 0.005	0.02	—	0.02	0.02	—	0.02	—	134	134	0.01	< 0.005	—	134

Architectural Coating	9.09	9.09	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.01	0.09	0.12	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	14.6	14.6	< 0.005	< 0.005	—	14.7
Architectural Coatings	1.00	1.00	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.02	0.02	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	2.42	2.42	< 0.005	< 0.005	—	2.43
Architectural Coatings	0.18	0.18	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.15. Linear, Grubbing & Land Clearing (2026) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.20	0.17	1.10	1.38	< 0.005	0.05	—	0.05	0.05	—	0.05	—	171	171	0.01	< 0.005	—	172
Dust From Material Movement	—	—	—	—	—	—	0.00	0.00	—	0.00	0.00	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Roa Equipment	0.02	0.02	0.12	0.15	< 0.005	0.01	—	0.01	0.01	—	0.01	—	18.8	18.8	< 0.005	< 0.005	—	18.8
Dust From Material Movement	—	—	—	—	—	—	0.00	0.00	—	0.00	0.00	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Roa d Equipm ent	< 0.005	< 0.005	0.02	0.03	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	3.11	3.11	< 0.005	< 0.005	—	3.12
Dust From Material Movement	—	—	—	—	—	—	0.00	0.00	—	0.00	0.00	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.07	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	13.2	13.2	< 0.005	< 0.005	< 0.005	13.4
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.50	1.50	< 0.005	< 0.005	< 0.005	1.52
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.25	0.25	< 0.005	< 0.005	< 0.005	0.25
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.17. Linear, Grading & Excavation (2026) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.33	0.28	2.53	3.74	0.01	0.07	—	0.07	0.07	—	0.07	—	534	534	0.02	< 0.005	—	536
Dust From Material Movement	—	—	—	—	—	—	0.00	0.00	—	0.00	0.00	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.33	0.28	2.53	3.74	0.01	0.07	—	0.07	0.07	—	0.07	—	534	534	0.02	< 0.005	—	536
Dust From Material Movement	—	—	—	—	—	—	0.00	0.00	—	0.00	0.00	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.14	0.11	1.04	1.54	< 0.005	0.03	—	0.03	0.03	—	0.03	—	220	220	0.01	< 0.005	—	220
Dust From Material Movement	—	—	—	—	—	—	0.00	0.00	—	0.00	0.00	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.02	0.19	0.28	< 0.005	0.01	—	0.01	< 0.005	—	< 0.005	—	36.4	36.4	< 0.005	< 0.005	—	36.5
Dust From Material Movement	—	—	—	—	—	—	0.00	0.00	—	0.00	0.00	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.02	0.01	0.17	0.00	0.00	0.03	0.03	0.00	0.01	0.01	—	29.7	29.7	< 0.005	< 0.005	0.10	30.2
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.02	0.01	0.14	0.00	0.00	0.03	0.03	0.00	0.01	0.01	—	26.4	26.4	< 0.005	< 0.005	< 0.005	26.8
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	< 0.005	0.06	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	11.2	11.2	< 0.005	< 0.005	0.02	11.4
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.86	1.86	< 0.005	< 0.005	< 0.005	1.89
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.19. Linear, Drainage, Utilities, & Sub-Grade (2026) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.19	0.16	1.87	3.41	< 0.005	0.06	—	0.06	0.05	—	0.05	—	535	535	0.02	< 0.005	—	537
Dust From Material Movement	—	—	—	—	—	—	0.00	0.00	—	0.00	0.00	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipm	0.19	0.16	1.87	3.41	< 0.005	0.06	—	0.06	0.05	—	0.05	—	535	535	0.02	< 0.005	—	537
Dust From Material Movement	—	—	—	—	—	—	0.00	0.00	—	0.00	0.00	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.04	0.03	0.36	0.66	< 0.005	0.01	—	0.01	0.01	—	0.01	—	104	104	< 0.005	< 0.005	—	104
Dust From Material Movement	—	—	—	—	—	—	0.00	0.00	—	0.00	0.00	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.07	0.12	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	17.2	17.2	< 0.005	< 0.005	—	17.2
Dust From Material Movement	—	—	—	—	—	—	0.00	0.00	—	0.00	0.00	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.02	0.01	0.17	0.00	0.00	0.03	0.03	0.00	0.01	0.01	—	29.7	29.7	< 0.005	< 0.005	0.10	30.2

Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.02	0.01	0.14	0.00	0.00	0.03	0.03	0.00	0.01	0.01	—	26.4	26.4	< 0.005	< 0.005	< 0.005	26.8
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.03	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	5.29	5.29	< 0.005	< 0.005	0.01	5.38
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.88	0.88	< 0.005	< 0.005	< 0.005	0.89
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.21. Linear, Drainage, Utilities, & Sub-Grade (2027) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.19	0.16	1.80	3.41	< 0.005	0.05	—	0.05	0.05	—	0.05	—	535	535	0.02	< 0.005	—	537

Dust From Material Movement	—	—	—	—	—	—	0.00	0.00	—	0.00	0.00	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.19	0.16	1.80	3.41	< 0.005	0.05	—	0.05	0.05	—	0.05	—	535	535	0.02	< 0.005	—	537
Dust From Material Movement	—	—	—	—	—	—	0.00	0.00	—	0.00	0.00	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.04	0.03	0.34	0.65	< 0.005	0.01	—	0.01	0.01	—	0.01	—	102	102	< 0.005	< 0.005	—	102
Dust From Material Movement	—	—	—	—	—	—	0.00	0.00	—	0.00	0.00	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.06	0.12	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	16.8	16.8	< 0.005	< 0.005	—	16.9

Dust From Material Movement	—	—	—	—	—	—	0.00	0.00	—	0.00	0.00	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.02	0.01	0.16	0.00	0.00	0.03	0.03	0.00	0.01	0.01	—	29.1	29.1	< 0.005	< 0.005	0.09	29.5
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.02	0.01	0.13	0.00	0.00	0.03	0.03	0.00	0.01	0.01	—	25.8	25.8	< 0.005	< 0.005	< 0.005	26.2
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	5.07	5.07	< 0.005	< 0.005	0.01	5.16
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.84	0.84	< 0.005	< 0.005	< 0.005	0.85
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.23. Linear, Paving (2027) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.32	0.27	2.33	3.05	< 0.005	0.11	—	0.11	0.10	—	0.10	—	457	457	0.02	< 0.005	—	459
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.04	0.04	0.32	0.42	< 0.005	0.01	—	0.01	0.01	—	0.01	—	62.6	62.6	< 0.005	< 0.005	—	62.8
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.06	0.08	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	10.4	10.4	< 0.005	< 0.005	—	10.4
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.02	0.01	0.16	0.00	0.00	0.03	0.03	0.00	0.01	0.01	—	29.1	29.1	< 0.005	< 0.005	0.09	29.5
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	3.66	3.66	< 0.005	< 0.005	0.01	3.72
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.61	0.61	< 0.005	< 0.005	< 0.005	0.62
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

5. Activity Data

5.1. Construction Schedule

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase	Phase Description
Demolition	Demolition	1/1/2026	2/25/2026	5.00	40.0	—
Site Preparation	Site Preparation	2/26/2026	3/3/2026	5.00	4.00	—
Grading	Grading	3/4/2026	3/13/2026	5.00	8.00	—
Building Construction	Building Construction	3/14/2026	9/24/2027	5.00	400	—
Paving	Paving	9/25/2027	10/22/2027	5.00	20.0	—
Architectural Coating	Architectural Coating	10/23/2027	12/17/2027	5.00	40.0	—
Linear, Grubbing & Land Clearing	Linear, Grubbing & Land Clearing	1/1/2026	2/25/2026	5.00	40.0	—
Linear, Grading & Excavation	Linear, Grading & Excavation	2/26/2026	9/23/2026	5.00	150	—
Linear, Drainage, Utilities, & Sub-Grade	Linear, Drainage, Utilities, & Sub-Grade	9/24/2026	4/7/2027	5.00	140	—

Linear, Paving	Linear, Paving	4/8/2027	6/16/2027	5.00	50.0	—

5.2. Off-Road Equipment

5.2.1. Unmitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Demolition	Concrete/Industrial Saws	Diesel	Average	1.00	8.00	33.0	0.73
Demolition	Tractors/Loaders/Backhoes	Diesel	Average	3.00	8.00	36.0	0.38
Demolition	Rubber Tired Dozers	Diesel	Average	1.00	8.00	367	0.40
Site Preparation	Scrapers	Diesel	Average	1.00	8.00	367	0.40
Site Preparation	Tractors/Loaders/Backhoes	Diesel	Average	1.00	8.00	84.0	0.37
Site Preparation	Graders	Diesel	Average	1.00	8.00	148	0.41
Grading	Graders	Diesel	Average	1.00	8.00	148	0.41
Grading	Rubber Tired Dozers	Diesel	Average	1.00	8.00	367	0.40
Grading	Tractors/Loaders/Backhoes	Diesel	Average	2.00	8.00	84.0	0.37
Building Construction	Cranes	Diesel	Average	1.00	7.00	367	0.29
Building Construction	Forklifts	Diesel	Average	3.00	8.00	82.0	0.20
Building Construction	Generator Sets	Diesel	Average	1.00	8.00	14.0	0.74
Building Construction	Tractors/Loaders/Backhoes	Diesel	Average	1.00	7.00	84.0	0.37
Building Construction	Welders	Diesel	Average	1.00	8.00	46.0	0.45
Paving	Pavers	Diesel	Average	2.00	8.00	81.0	0.42
Paving	Paving Equipment	Diesel	Average	2.00	8.00	89.0	0.36
Paving	Rollers	Diesel	Average	2.00	8.00	36.0	0.38
Architectural Coating	Air Compressors	Diesel	Average	1.00	6.00	37.0	0.48

Linear, Grubbing & Land Clearing	Sweepers/Scrubbers	Diesel	Average	1.00	8.00	36.0	0.46
Linear, Grading & Excavation	Concrete/Industrial Saws	Diesel	Average	1.00	8.00	33.0	0.73
Linear, Grading & Excavation	Tractors/Loaders/Backhoes	Diesel	Average	1.00	8.00	84.0	0.37
Linear, Drainage, Utilities, & Sub-Grade	Skid Steer Loaders	Diesel	Average	1.00	8.00	71.0	0.37
Linear, Drainage, Utilities, & Sub-Grade	Tractors/Loaders/Backhoes	Diesel	Average	1.00	8.00	84.0	0.37
Linear, Paving	Rollers	Diesel	Average	1.00	8.00	36.0	0.38
Linear, Paving	Pavers	Diesel	Average	1.00	8.00	81.0	0.42

5.3. Construction Vehicles

5.3.1. Unmitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Demolition	—	—	—	—
Demolition	Worker	12.5	7.70	LDA,LDT1,LDT2
Demolition	Vendor	—	4.00	HHDT,MHDT
Demolition	Hauling	0.00	20.0	HHDT
Demolition	Onsite truck	—	—	HHDT
Site Preparation	—	—	—	—
Site Preparation	Worker	7.50	7.70	LDA,LDT1,LDT2
Site Preparation	Vendor	—	4.00	HHDT,MHDT
Site Preparation	Hauling	0.00	20.0	HHDT
Site Preparation	Onsite truck	—	—	HHDT
Grading	—	—	—	—
Grading	Worker	10.0	7.70	LDA,LDT1,LDT2
Grading	Vendor	—	4.00	HHDT,MHDT

Grading	Hauling	0.00	20.0	HHDT
Grading	Onsite truck	—	—	HHDT
Building Construction	—	—	—	—
Building Construction	Worker	0.00	7.70	LDA,LDT1,LDT2
Building Construction	Vendor	0.00	4.00	HHDT,MHDT
Building Construction	Hauling	0.00	20.0	HHDT
Building Construction	Onsite truck	—	—	HHDT
Paving	—	—	—	—
Paving	Worker	15.0	7.70	LDA,LDT1,LDT2
Paving	Vendor	—	4.00	HHDT,MHDT
Paving	Hauling	0.00	20.0	HHDT
Paving	Onsite truck	—	—	HHDT
Architectural Coating	—	—	—	—
Architectural Coating	Worker	0.00	7.70	LDA,LDT1,LDT2
Architectural Coating	Vendor	—	4.00	HHDT,MHDT
Architectural Coating	Hauling	0.00	20.0	HHDT
Architectural Coating	Onsite truck	—	—	HHDT
Linear, Grubbing & Land Clearing	—	—	—	—
Linear, Grubbing & Land Clearing	Worker	2.50	7.70	LDA,LDT1,LDT2
Linear, Grubbing & Land Clearing	Vendor	0.00	4.00	HHDT,MHDT
Linear, Grubbing & Land Clearing	Hauling	0.00	20.0	HHDT
Linear, Grubbing & Land Clearing	Onsite truck	—	—	HHDT
Linear, Grading & Excavation	—	—	—	—
Linear, Grading & Excavation	Worker	5.00	7.70	LDA,LDT1,LDT2
Linear, Grading & Excavation	Vendor	0.00	4.00	HHDT,MHDT
Linear, Grading & Excavation	Hauling	0.00	20.0	HHDT
Linear, Grading & Excavation	Onsite truck	—	—	HHDT
Linear, Drainage, Utilities, & Sub-Grade	—	—	—	—

Linear, Drainage, Utilities, & Sub-Grade	Worker	5.00	7.70	LDA,LDT1,LDT2
Linear, Drainage, Utilities, & Sub-Grade	Vendor	0.00	4.00	HHDT,MHDT
Linear, Drainage, Utilities, & Sub-Grade	Hauling	0.00	20.0	HHDT
Linear, Drainage, Utilities, & Sub-Grade	Onsite truck	—	—	HHDT
Linear, Paving	—	—	—	—
Linear, Paving	Worker	5.00	7.70	LDA,LDT1,LDT2
Linear, Paving	Vendor	0.00	4.00	HHDT,MHDT
Linear, Paving	Hauling	0.00	20.0	HHDT
Linear, Paving	Onsite truck	—	—	HHDT

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

Non-applicable. No control strategies activated by user.

5.5. Architectural Coatings

Phase Name	Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
Architectural Coating	0.00	0.00	0.00	0.00	78,408

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (cy)	Material Exported (cy)	Acres Graded (acres)	Material Demolished (sq. ft.)	Acres Paved (acres)
Demolition	0.00	0.00	0.00	—	—
Site Preparation	—	—	6.00	0.00	—
Grading	—	—	8.00	0.00	—

Paving	0.00	0.00	0.00	0.00	47.0
Linear, Grubbing & Land Clearing	—	—	17.0	0.00	—
Linear, Grading & Excavation	—	—	17.0	0.00	—
Linear, Drainage, Utilities, & Sub-Grade	—	—	17.0	0.00	—

5.6.2. Construction Earthmoving Control Strategies

Non-applicable. No control strategies activated by user.

5.7. Construction Paving

Land Use	Area Paved (acres)	% Asphalt
User Defined Linear	17.0	100%
Other Non-Asphalt Surfaces	30.0	0%

5.8. Construction Electricity Consumption and Emissions Factors

kWh per Year and Emission Factor (lb/MWh)

Year	kWh per Year	CO2	CH4	N2O
2026	0.00	204	0.03	< 0.005
2027	0.00	204	0.03	< 0.005

8. User Changes to Default Data

Screen	Justification
Construction: Construction Phases	Two-year construction timeline.
Construction: Off-Road Equipment	Linear construction equipment added.

HARP Project Summary Report 7/24/2025 1:40:01 PM

PROJECT INFORMATION
HARP Version: 22118
Project Name: COMUNIDAD NUEVO LAGO
Project Output Directory: C:\HARP2\COMUNIDAD NUEVO LAGO
HARP Database: NA

FACILITY INFORMATION
Origin
X (m):0
Y (m):0
Zone:1
No. of Sources:0
No. of Buildings:0

EMISSION INVENTORY
No. of Pollutants:1
No. of Background Pollutants:0

Emissions

ScrID	StkID	ProID	PolID	PolAbbrev	Multi	Annual Ems (lbs/yr)	MaxHr Ems (lbs/hr)	MWAF
CON	0	0	9901	DieselExhPM	1	89.685	0.0825	1

Background

PolID	PolAbbrev	Conc (ug/m^3)	MWAF

Ground level concentration files (\glc\)

9901MAXHR.txt
9901PER.txt

POLLUTANT HEALTH INFORMATION
Health Database: C:\HARP2\Tables\HEALTH17320.mdb
Health Table Version: HEALTH25003
Official: True

PolID	PolAbbrev	InhCancer	OralCancer	AcuteREL	InhChronicREL	OralChronicREL	InhChronic8HRREL
9901	DieselExhPM	1.1					5

AIR DISPERSION MODELING INFORMATION
Versions used in HARP. All executables were obtained from USEPA's Support Center for Regulatory Atmospheric Modeling website (http://www.epa.gov/scram001/)
AERMOD: 18081
AERMAP: 18081
BPIPPRM: 04274
AERPLOT: 13329

METEOROLOGICAL INFORMATION
Version:
Surface File:
Profile File:
Surface Station:
Upper Station:
On-Site Station:

LIST OF AIR DISPERSION FILES
AERMOD Input File:
AERMOD Output File:
AERMOD Error File:
Plotfile list
_____

LIST OF RISK ASSESSMENT FILES
Health risk analysis files (\hra\)
_____
CON_CancerRisk.csv
CON_CancerRiskSumByRec.csv
CON_GLCList.csv
CON_HRAInput.hra
CON_NCAcuteRisk.csv
CON_NCAcuteRiskSumByRec.csv
CON_NCChronicRisk.csv
CON_NCChronicRiskSumByRec.csv
CON_Output.txt
CON_PathwayRec.csv
CON_PolDB.csv

Spatial averaging files (\sa\)
_____

Appendix B: Biological Resources Evaluation

MALAGA COUNTY WATER DISTRICT

COMUNIDAD NUEVO LAGO MOBILE HOME PARK SEWER CONSOLIDATION PROJECT BIOLOGICAL EVALUATION

FRESNO, CALIFORNIA
JULY 2025

PREPARED FOR:
Malaga County Water District
3580 S Frank Ave. Fresno, California 93725

PREPARED BY:
Provost & Pritchard Consulting Group
455 W. Fir Ave, Clovis, California 93612

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Report Prepared for:

Malaga County Water District
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Administrative Support: Jackie Lancaster, Senior Project Administrator

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ACRONYMS AND ABBREVIATIONS

APE ..... Area of Potential Effect
BMP ..... Best Management Practices
BUOW ..... Burrowing Owl
CDFW ..... California Department of Fish and Wildlife
CEQA ..... California Environmental Quality Act
CESA ..... California Endangered Species Act
CFR ..... Code of Federal Regulations
CNDDB ..... California Natural Diversity Database
CNPS ..... California Native Plant Society
County ..... Fresno County
CWA ..... Clean Water Act
EFH ..... Essential Fish Habitat
ESA ..... Endangered Species Act
°F..... ..... degrees Fahrenheit
HCP ..... Habitat Conservation Plan
IPaC ..... United States Fish and Wildlife Service's Information for Planning and Consultation system
LF ..... linear feet
MBTA ..... Migratory Bird Treaty Act
MCWD ..... Malaga County Water District
MHP ..... Mobile Home Park
NCCP ..... Natural Community Conservation Plan
NEPA ..... National Environmental Policy Act
NMFS ..... National Marine Fisheries Service
NPDES ..... National Pollutant Discharge Elimination System
NRCS ..... Natural Resources Conservation Service
NWI ..... National Wetlands Inventory
Project ..... Comunidad Nuevo Lago Mobile Home Park Sewer Consolidation Project
Provost & Pritchard ..... Provost & Pritchard Consulting Group
RWQCB ..... Regional Water Quality Control Board
SWPPP ..... Storm Water Pollution Prevention Plan
SWRCB ..... State Water Resources Control Board
USACE ..... United States Army Corps of Engineers
USC ..... United States Code

USEPA ..... United States Environmental Protection Agency

USFWS ..... United States Fish and Wildlife Service

USGS ..... United States Geological Survey

WOTUS ..... waters of the United States

WWTF ..... Wastewater Treatment Facility

1 INTRODUCTION

This Biological Evaluation, prepared by Provost & Pritchard Consulting Group (Provost & Pritchard) in compliance with the California Environmental Quality Act (CEQA) and National Environmental Policy Act (NEPA), includes descriptions of the biological resources present or with potential to occur within the Comunidad Nuevo Lago Mobile Home Park Sewer Consolidation Project (or "project") and surrounding areas, potential project-related impacts or effects to those resources, and mitigation measures to reduce these impacts and effects to a less-than-significant level under CEQA and NEPA.

1.1 PROJECT DESCRIPTION

The Project site (or "site") is located approximately one mile south of Malaga County Water District (MCWD) on the west side of Chestnut Avenue between Jefferson and Lincoln Avenues as well as the northwest corner of Central and Maple Avenues (see Figure 1).

The project's Area of Potential Effect (APE) includes a 65-space mobile home park (MHP) called Comunidad Nuevo Lago MHP and, prior to 2024, was referred to as Shady Lakes MHP. The APE also includes the MHP's wastewater treatment facility (or "WWTF") owned and operated by MCWD. The APE also includes paved roads, Central Canal, Washington Colony Canal, Oleander Canal, cropland, fallow fields, parking lots, and residential housing (see Figure 2). Surrounding lands on both sides of the APE include business facilities, active/inactive cropland, and residential neighborhoods with paved roads.

The project proposes to construct a new lift station at the MHP, a new force main from the MHP to the MCWD boundary at American Ave and Chestnut Ave, and a gravity sewer main as master planned to the point of connection with the existing MCWD sewer collection system. The MCWD Master Plan includes extending the 15-inch sewer main in Maple Avenue from the WWTF to Malaga Avenue, a 12-inch sewer main in Malaga Avenue from Maple to Chestnut, then south in Chestnut to American Avenue. Extension of the gravity sewer line would allow for service of the area without the requirement for existing private lift stations which serve a few properties along the proposed pipeline route. Extension of the new 12-inch pipeline in Malaga Avenue would include the abandoning the existing 6-inch sewer main in Malaga Avenue and connection of the existing services to the new sewer main. Extension of the 12-inch diameter pipeline in Malaga Avenue would also allow for the connection of several properties that are presently served by septic tanks and leach fields. Similarly, extension of the new 12-inch sewer main in Chestnut Avenue south of Malaga would include the elimination of the existing 6-inch pipeline and relocation of the existing services to the new sewer main. The project would also include improvements to the MCWD WWTF. This includes demolishing the equipment in the Dissolved Air Flotation basin, installing one recirculating pump in the 3rd aeration basin, installing oil and grease removal in grit chamber, modifying the air piping, installing recirculation flow meter and sludge flow meters, removal of berms between disposal pond 1, 2 and 5, replacing one influent pump, replacing one blower, and constructing new circular clarifiers. Once the connection to the MCWD is completed, the existing MHP WWTF would need to be properly demolished.

The force main would be four inches in diameter and approximately 4,000 linear feet (LF) long. The force main will include crossing of two Fresno Irrigation District Canals (Oleander Canal and Washington Colony Canal) by either jack and boring or directional drilling. The 15-inch gravity sewer main would be approximately 2,300 LF. The 12-inch gravity sewer main would be approximately 5,300 LF. The design includes twenty (20), 4-ft diameter manholes along the gravity sewer main alignment.

1.2 REPORT OBJECTIVES

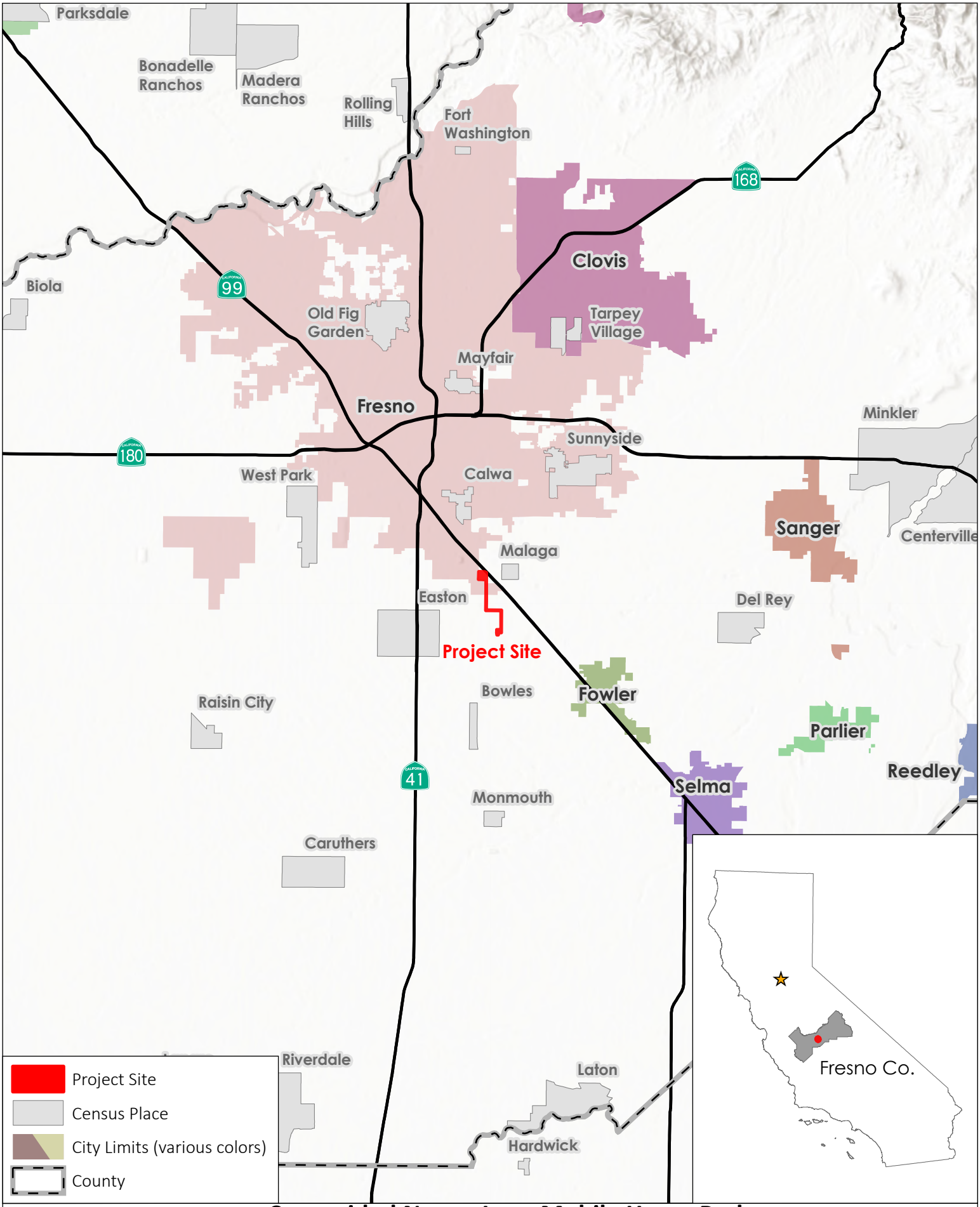
Construction activities such as those proposed by the project could potentially change biological resources or habitats that are critical for sensitive plant and wildlife species. In cases such as these, development may be regulated by state or federal agencies, and/or addressed by local regulatory agencies.

This report addresses issues related to the following:

- The presence of sensitive biological resources within the APE, or those with the potential to occur within the APE.
- The federal, state, and local regulations regarding these resources.
- Mitigation measures that may be required to reduce the magnitude of anticipated impacts and/or comply with permit requirements of state and federal resource agencies.

Therefore, the objectives of this report are to:

- Summarize all APE-specific information related to existing biological resources.
- Make reasonable inferences about the biological resources that could occur on the APE based on habitat suitability and the proximity of the APE to a species' known range.
- Summarize all state and federal natural resource protection laws that may be relevant to implementation of the project.
- Identify and discuss project impacts and effects to biological resources likely to occur onsite within the context of CEQA, NEPA, and/or state or federal laws.
- Identify and prescribe a set of avoidance and minimization measures that would reduce impacts to a less-than-significant level (as identified by CEQA) or avoid and minimize effects (as identified by NEPA) and are generally consistent with recommendations of the resource agencies for affected biological resources.



Comunidad Nuevo Lago Mobile Home Park Sewer Consolidation Project

Self-Help Enterprises

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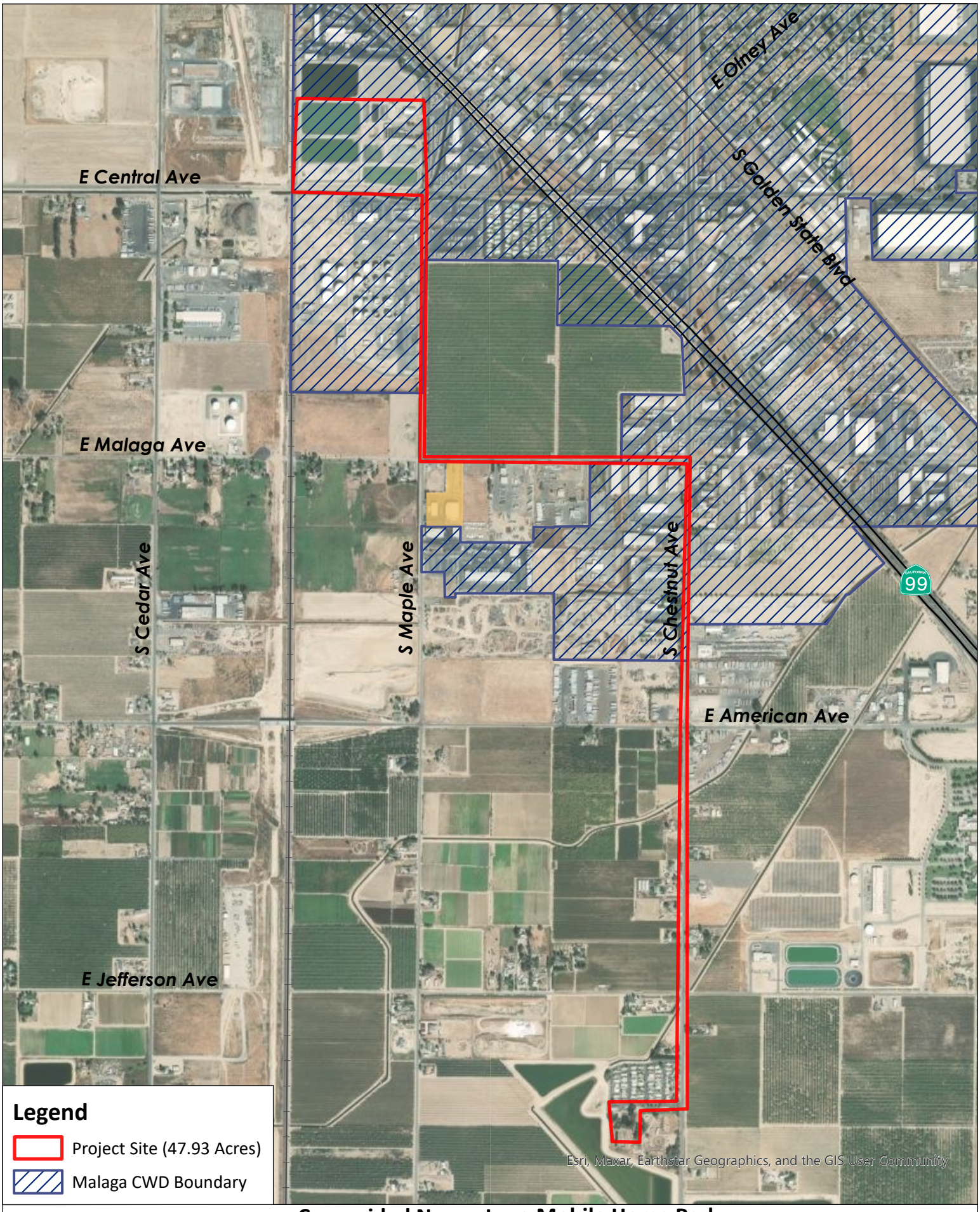

Legend

- Project Site (47.93 Acres)
- Malaga CWD Boundary

0 0.1 0.2

Miles

Comunidad Nuevo Lago Mobile Home Park Sewer Consolidation Project

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1.3 STUDY METHODOLOGY

A reconnaissance-level field survey of the APE was conducted on May 5, 2025, by Provost & Pritchard biologist, Olivia Arredondo. The survey consisted of walking and driving throughout the APE and visually surveying areas outside of the APE and within the 40-foot buffer of the pipeline section of the APE, a 65-space MHP and the WWTF owned and operated by MCWD while identifying and noting land uses, biological habitats and communities, and plant and animal species encountered. Habitats were also assessed to help with determining if they could be suitable for various rare or protected plant and animal species. Representative photographs of the site were taken and are presented in Appendix A.

Ms. Arredondo then utilized the results of the field survey to analyze potential project-related impacts to biological resources based on the resources known to occur or with the potential to occur within the APE. Sources of information used in preparation of this analysis included: California Department of Fish and Wildlife's California Natural Diversity Database (CNDDB; see Appendix B for the species list) and California Wildlife Habitat Relationships database; California Native Plant Society's (CNPS) Online Inventory of Rare and Endangered Vascular Plants of California; CalFlora's online database of California native plants; Jepson Herbarium's online database (i.e., Jepson eFlora); United States Fish and Wildlife Service's (USFWS) Environmental Conservation Online System, Information for Planning and Consultation (IPaC; see Appendix C for the species list) system, and National Wetlands Inventory (NWI); iNaturalist; NatureServe Explorer's online database; United States Department of Agriculture Natural Resources Conservation Service's (NRCS) Web Soil Survey (see Appendix D for the Web Soil Survey Report); California Herps website; and various manuals, reports, and references related to plants and animals of the San Joaquin Valley region.

The field survey did not include focused surveys for special status species. The field survey conducted included the appropriate level of detail to assess the significance of potential impacts to sensitive biological resources resulting from implementing the project. Furthermore, the field survey was sufficient to generally describe aquatic features of the APE that could be claimed as jurisdictional by federal and/or state agencies, such as the United States Army Corps of Engineers (USACE), California Department of Fish and Wildlife (CDFW), Regional Water Quality Control Board (RWQCB), and the State Water Resources Control Board (SWRCB). If project activities resulted in impacts to aquatic resources and aquatic habitats, this report would be sufficient to support required permit applications, if needed, for the project.

2 EXISTING CONDITIONS

2.1 REGIONAL SETTINGS

2.1.1 TOPOGRAPHY

The APE is located within the *Malaga* U.S. Geological Survey (USGS) 7.5-minute quadrangle within the western edge of Section 1, 25, and 36, Township 14 and 15 South, Range 20 East. The topography of the APE is approximately 300 feet above mean sea level and relatively flat with the depressions from the various onsite ponds ranging from 285-300 feet above mean sea level (see Figure 3).

2.1.2 CLIMATE

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

2.1.3 HYDROLOGY

The nearest surface water to the project are the Central Canal which runs along the southern boundary of the WWTF, Oleander Canal along the western half of the MHP, and man-made ponds west and south of the MHP. Central Canal, Oleander Canal, and Washington Colony Canal experience variable flow most years. According to Google Earth imagery, spring (notably March and April) and fall (August through November) the canals appear dry but wet/ flowing the remainder of the year.

Stormwater and snowmelt runoff from upland areas and flow into Dog Creek, Hog Creek, Friant-Kern Canal, and Fancher Creek, which flow into Central Canal and Washington Colony Canal. Central Canal runs south until it approaches the southeast corner of the WWTF, then it runs west along the southern border. The canal continues west and branches off into the American Colony Canal and irrigation canals. Washington Colony Canal splits to form Oleander Canal before running west to connect with American Colony Canal. Oleander Canal runs west into Wristen Canal.

2.1.4 SOILS

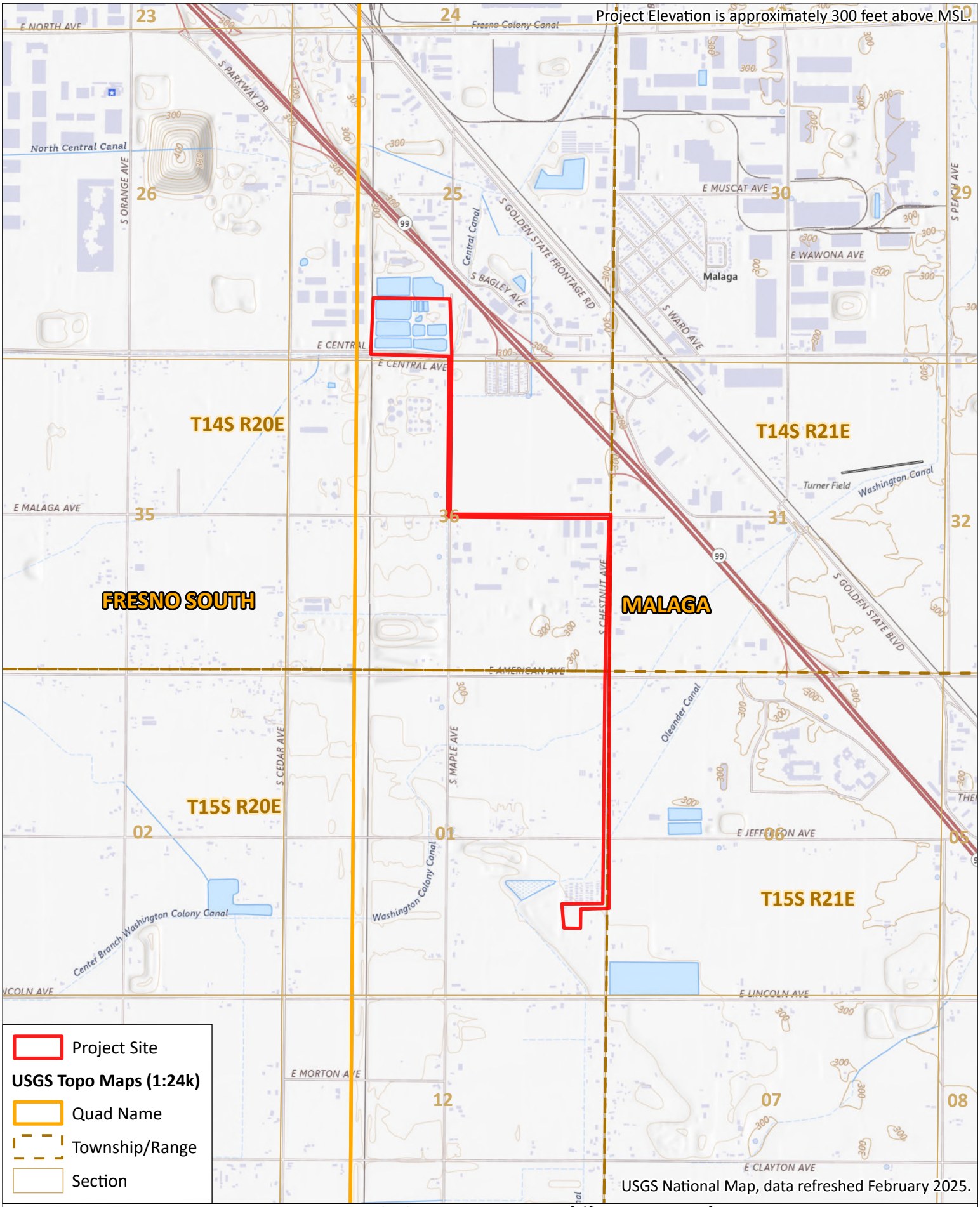
Nine soil mapping units representing five soil types were identified within the APE and are listed in Table 1 (see Appendix D for the Web Soil Survey Report). The soils are displayed with their core properties in the table below, according to the Major Land Resource Area of California. All ten soils are primarily used for grazing, wildlife habitat, and watershed areas.

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

Soil	Soil Map Unit	Percent of APE	Hydric Soil Category	Drainage	Permeability	Runoff
Delhi	Loamy sand, 0 to 3 percent slopes	3.5%	Predominantly Nonhydric	Somewhat excessively drained	High to very high	Very low
	Loamy sand, 3 to 9 percent slopes	2.0%	Nonhydric	Somewhat excessively drained	High to very high	Very low

Soil	Soil Map Unit	Percent of APE	Hydric Soil Category	Drainage	Permeability	Runoff
Dello	Loamy sand	3.5%	Predominantly Hydric	Somewhat poorly drained	High to very high	Very low
Hanford	Sandy loam	2.7%	Nonhydric	Well drained	High	Very low
	Fine sandy loam	3.8%	Predominantly Nonhydric	Well drained	High	Very low
Hesperia	Sandy loam, very deep	9.1%	Nonhydric	Well drained	Moderately low	Negligible
	Fine sandy loam, very deep	27.6%	Nonhydric	Well drained	Moderately low	Negligible
	Fine sandy loam, deep, saline-sodic	5.2%	Nonhydric	Well drained	Moderately low	Negligible
Miscellaneous water	-	42.6%	-	-	-	-

Hydric soils are defined as soils that are saturated, flooded, or ponded long enough during the growing season to develop anaerobic conditions such that under sufficiently wet conditions, hydrophytic vegetation can be supported. Hydric soil ratings are derived from specific soil properties as well as climate, parent material, vegetation, landform type, and biological activity of a certain location. Seven of the major soil mapping units are nonhydric or predominantly nonhydric and make up 39.4% of the site. Water identified on the site is within the WWTF and makes up 54.0% of the site.



Comunidad Nuevo Lago Mobile Home Park Sewer Consolidation Project

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2.2 BIOTIC HABITATS

Seven biotic habitats were observed within the APE and included agriculture, canal, non-native grassland, pastureland, residential, ruderal, and ponds (see Figure 4 and Figure 5). These habitats and their constituent plant and animal species are described in more detail in the following sections.

2.2.1 AGRICULTURE

The APE contained active agricultural habitat which included orchards along Maple Avenue, Malaga Avenue, and Chestnut Avenue. Wildlife species observed in this habitat included European starlings (*Sturnus vulgaris*) and red-winged blackbirds (*Agelaius phoeniceus*). The orchards offer foraging opportunities for a wide variety of wildlife including insects, passerines, and small mammals, which in turn offer larger, predatory species prey to hunt.

2.2.2 CANAL

The canal habitat included three canals, one to the north along the southern boundary of the WWTF called Central Canal and two to the south that run across South Chestnut Avenue called Washington Colony Canal and Oleander Canal. Vegetation was scarce along most of the canals but included mulefat (*Baccharis salicifolia*), scouring rush (*Equisetum hyemale*), and grasses. None of the canals within the APE drain to jurisdictional water. An individual killdeer (*Charadrius vociferus*) was identified on the bank at Oleander Canal. No nesting behavior was observed. While all three canals had flowing water during the survey, all three canals become dry during spring (notably March and April) and fall (August through November) due to regulation of flows, as identified by aerial imagery. The canals likely act as a corridor for terrestrial wildlife such as mammals, reptiles, and vertebrates when dry. Birds, bats, rodents, larger mammals, invertebrates, and reptiles likely use this as a water source when water is present.

2.2.3 PASTURELAND

Pastureland habitat within the APE is located along the southeast edge of the MHP at a defunct horse stable. The APE is dominated by somewhat-maintained annual grasslands composed of slender wild oat (*Avena barbata*), bromes (*Bromus* spp.), Mediterranean grass (*Schismus barbatus*), and Bermuda grass (*Cynodon dactylon*) with Eucalyptus trees (*Eucalyptus deglupta*) lining the boundaries.

The survey of the APE resulted in the identification of numerus bird species including European starlings and Eurasian collared doves (*Streptopelia decaocto*), both observed foraging in this habitat. California ground squirrels (*Otospermophilus beecheyi*) and their burrows were observed throughout this habitat. Dried horse (*Equus ferus caballus*) scat was observed in the abandoned gated pastures. This portion of the APE serves a wide range of foraging birds during the day and coyotes and other nocturnal animals at night.

2.2.4 NON-NATIVE GRASSLAND

The non-native grassland habitat within the APE is located adjacent to the two southern-most ponds at the MHP as well as the fallow fields along South Chestnut Avenue surrounded by active cropland, residential areas, and businesses. The APE was densely vegetated within this habitat type and composed of short-pod mustard (*Hirschfeldia incana*), mulefat, wild radish (*Raphanus raphanistrum*), rigid fiddleneck (*Amsinckia menziesii*), goosefoot (*Chenopodium album*), Bermuda grass, puncturevine (*Tribulus terrestris*), prostrate pigweed (*Amaranthus blitoides*), prickly lettuce (*Lactuca serriola*), common groundsel (*Senecio vulgaris*), and a variety of barleys (*Hordeum* spp.) and bromes (*Bromus* spp.).

The survey of this habitat did not result in any new wildlife species observations. The non-native grassland habitat within the APE is severely disturbed from past use but provides densely vegetated habitat to a variety of wildlife year-round. The non-native grassland within the APE, like the previously mentioned pastureland habitat, serves a variety of predatory wildlife but due to the denser vegetation, also offers cover and foraging for prey species such as small rodents, reptiles, and other bird species.

2.2.5 PONDS

The ponds were found in both the MHP and WWTF. At the MHP, there were three distinct ponds, two of which contained water during the survey. The MHP ponds had Eucalyptus trees lining the boundary adjacent to the previously noted pastureland habitat. California ground squirrels were active along these ponds and had burrows dug along the banks. An unattended bird nest was observed on the ground below a Eucalyptus tree near the northern-most pond. The northern MHP pond had red-eared sliders (*Trachemys scripta elegans*) and dragonflies (*Anisoptera*) present.

At the WWTF, ten ponds were present within the APE but only one had water present. The vegetation growing within the dry WWTF ponds included European heliotrope (*Heliotropium europaeum*), small melilot (*Melilotus indicus*), and cheeseweed mallow (*Malva neglecta*). At the one active pond, American coots (*Fulica americana*), black-neck stilts (*Himantopus himantopus mexicanus*), mallards (*Anas platyrhynchos*), a snowy egret (*Egretta thula*), and Canada geese (*Branta canadensis*) with goslings were observed. An unattended Canada goose nest was observed along the southern edge of the active pond.

While the mapped ponds were heavily disturbed from the surrounding areas, all the ponds with water were being used as water sources, nesting/ burrowing habitat, and foraging habitat for a wide variety of wildlife including birds, invertebrates, and small mammals.

2.2.6 RESIDENTIAL

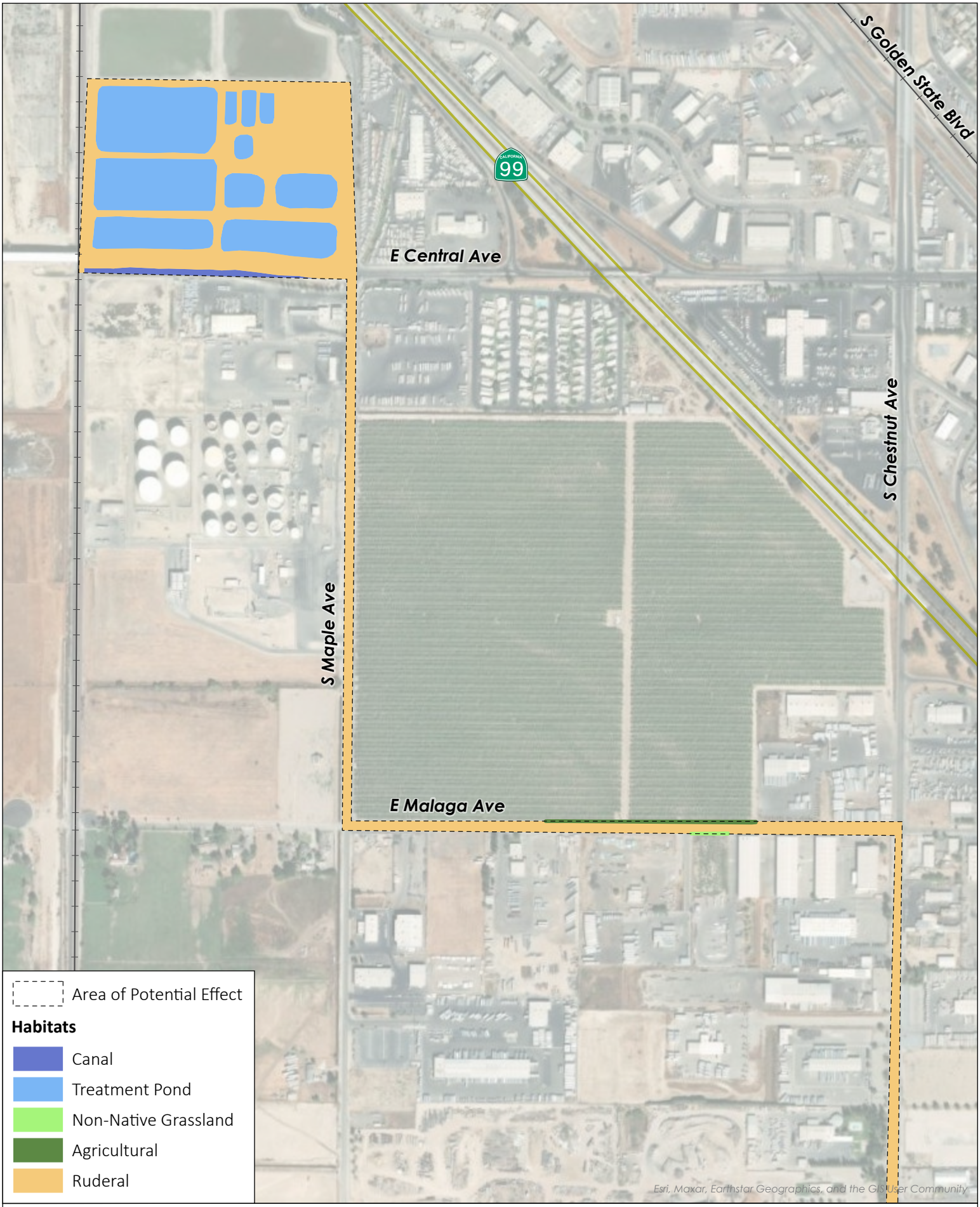
The residential portion of the APE contains houses and paved roads/ sidewalks. Vegetation in this section of the APE included ornamental plants and a variety of grasses surrounding houses. The survey of this habitat did not result in any new wildlife species observations.

2.2.7 RUDERAL

The ruderal habitat of the site contained MHP (excluding the residential area, pastureland, non-native grassland, and ponds), WWTF (excluding the ponds), paved roads, and dirt access roads throughout the APE. Vegetation in this section of the site was dominated by a wide variety of grasses. Eucalyptus trees, multiple Northern California black walnut trees (*Juglans hindsii*), and bottlebrush trees (*Callistemon* sp.) were primarily found at the MHP. The vegetation identified within the ruderal habitat of the APE include slender wild oat, common Mediterranean grass, Bermuda grass, prostrate pigweed, narrowleaf milkweed (*Asclepias fascicularis*), short-pod mustard, rabbit's-foot grass (*Polypogon monspeliensis*), longbeak stork's bill (*Erodium botrys*), wall barley (*Hordeum murinum*), common groundsel, upright pepperweed (*Lepidium strictum*), telegraph weed (*Heterotheca grandiflora*), shepherd's purse (*Capsella bursa-pastoris*), dwarf nettle (*Urtica urens*), sacred datura (*Datura wrightii*), common soft brome (*Bromus hordeaceus*), burr clover (*Medicago polymorpha*), curly dock (*Rumex crispus*), common horehound (*Marrubium vulgare*), matted sandmat (*Euphorbia serpens*), rescuegrass (*Bromus catharticus*), Russian thistle (*Salsola tragus*), common spikeweed (*Centromadia pungens*), ripgut brome (*Bromus diandrus*), and Italian thistle (*Carduus pycnocephalus*).

Surveying this habitat type within the APE resulted in the identification of numerus bird species including American crow (*Corvus brachyrhynchos*), American kestrel (*Falco sparverius*), black phoebe (*Sayornis nigricans*), California scrub-jay (*Aphelocoma californica*), European starling, Eurasian collar dove, house finch (*Haemorhous mexicanus*), house sparrow (*Passer domesticus*), killdeer, mourning dove (*Zenaida macroura*), northern mockingbird (*Mimus polyglottos*), red-tailed hawk (*Buteo jamaicensis*), and rock pigeon (*Columba livia*). Invertebrates observed in this habitat included Asian lady beetle (*Harmonia axyridis*), June beetle (*Cotinis nitida*), and unidentified bees (Anthophila). A highly-decomposed snake carcass was observed adjacent to a paved road in the southern section of the MHP and, based on a small fragment of skin with scales, was identified as a juvenile Pacific gopher snake (*Pituophis catenifer catenifer*). At the WWTF, coyote (*Canis latrans*) scat and tracks were observed on the access roads along the southern

boundary of the WWTF and adjacent to Central Canal. Unattended domestic dogs (*Canis lupus familiaris*) have been seen around the facility according to an employee, but no individuals, scat, or tracks were observed during the survey.



North Habitats Map

Comunidad Nuevo Lago Mobile Home Park

PROVOST& PRITCHARD



South Habitats Map
Comunidad Nuevo Lago Mobile Home Park

PROVOST& PRITCHARD

2.3 NATURAL COMMUNITIES OF SPECIAL CONCERN AND RIPARIAN HABITAT

Natural communities of special concern are those that are of limited distribution, distinguished by significant biological diversity, or home to special status species. CDFW has classified and mapped all natural communities in California. Just as the special status plant and animal species (see Section 2.6), these natural communities of special concern can be found within the CNDDB. There are no recorded observations of a natural community of special concern mapped within the site and no natural communities of special concern were observed during the field survey.

Riparian habitat is composed of plant communities that occur along the banks, and sometimes over the banks, of most waterways and is an important habitat for numerous wildlife species. CDFW has jurisdiction over most riparian habitat in California. All three canals present within the APE were manmade and offered no riparian habitat for wildlife to utilize. No impacts are anticipated for the canals within the APE.

2.4 DESIGNATED CRITICAL HABITAT

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

2.5 WILDLIFE MOVEMENT CORRIDORS AND NATIVE WILDLIFE NURSERY SITES

Wildlife movement corridors are routes that animals regularly and predictably follow during seasonal migration, dispersal from native ranges, daily travel within home ranges, and inter-population movements. Movement corridors in California are typically associated with valleys, ridgelines, rivers, and creeks supporting riparian vegetation. The canal habitat could potentially act as a corridor for terrestrial wildlife during the dry season and aquatic species when water is present, however, the surrounding area is highly disturbed and would discourage use of the canal for dispersal activities.

Native wildlife nursery sites are areas where a species or group of similar species raise their young in a concentrated place, such as maternity bat roosts. The Eucalyptus trees located within the APE could function as native wildlife nursery sites for birds. The active pond at the WWTF was being used as wildlife nursery sites for waterfowl species which were observed during the survey.

2.6 SPECIAL STATUS PLANTS AND ANIMALS

California contains several rare plant and animal species. In this context, "rare" is defined as a species known to have low populations or limited distributions. Conversion of habitats to accommodate human population growth in turn reduces the already-limited suitable habitat for rare species. This results in rare and sensitive species becoming increasingly more vulnerable to extirpation. State and federal regulations have provided the CDFW and USFWS with mechanisms for conserving and protecting the diversity of plant and animal species native to California. Numerous native plants and animals have been formally designated as "threatened" or "endangered" under state and federal endangered species legislation. Other formal designations include "candidate" for listing or "species of special concern" by CDFW. The CNPS has its list of native plants considered rare, threatened, or endangered. Collectively these animals and plants are referred to as "special status species."

A query of the CNDDB for occurrences of special status plant and animal species was conducted for the *Malaga* USGS 7.5-minute quadrangles that contains the APE, and for the eight surrounding USGS quadrangles: *Fresno North*, *Clovis*, *Round Mountain*, *Fresno South*, *Sanger*, *Caruthers*, *Conejo*, and *Selma*. A query of the IPaC was also completed for the APE. These species, and their potential to occur within the

APE, are listed in Table 2 and Table 3, below. Other special status species that did not show up in the CNDDB query, but have the potential to occur in the vicinity, are also included in Table 3. Species lists obtained from CNDDB and IPaC are available in Appendix B and Appendix C, respectively. All relevant sources of information, as discussed in the Study Methodology section of this report, as well as field observations, were used to determine if any special status species have the potential to occur within the APE.

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

Species	Status*	Habitat	Occurrence within the APE
Alkali-sink goldfields (*Lasthenia chrysantha*)	CNPS 1B	Found in vernal pool and wet saline flat habitats in the San Joaquin Valley region at elevations below 700 feet. Blooms February – April.	**Absent.** The APE does not provide suitable vernal pool habitat to support this species.
Bristly sedge (*Carex comosa*)	CNPS 2B	Found in marshes, swamps, coastal prairies, and valley and foothill grasslands, often along lake margins and wet areas at elevations between -16 and 3,310 feet. Areas below sea level occur on a Delta Island. Blooms July – September.	**Unlikely.** The ponds and the canals within the APE could provide the wetted areas needed for this species, but the surrounding area is highly disturbed by active cropland, residential areas, and industrial facilities. This species was not observed during the survey or within the vicinity. The nearest recorded observation of this species within the vicinity was approximately 11.5 miles east of the APE in 1989.
California jewelflower (*Caulanthus californicus*)	FE, CE, CNPS 1B	Found in the San Joaquin Valley and western Transverse Ranges in sandy soils. Occurs on flats and slopes, generally in non-alkaline grassland at elevations between 200 and 6,100 feet. Blooms February – April.	**Absent.** CNDDB lists this species as "extirpated" from the region.
California satintail (*Imperata brevifolia*)	CNPS 2B	Often found in wet springs, meadows, streambanks, and floodplains, and can also be found in coastal scrub, riparian scrub, Mojavean desert scrub, chaparral, and alkali seeps at elevations below 1,600 feet. Blooms September – May.	**Absent.** The APE does not provide suitable aquatic habitat to support this species.
Forked hare-leaf (*Lagophylla dichotoma*)	CNPS 1B	Found in cismontane woodland, and valley and foothill grassland communities at elevations between 600 and 1,100 feet. Blooms April – May.	**Absent.** The APE does not provide suitable habitat and is outside the elevational range of this species.
Greene's tuctoria (*Tuctoria greenei*)	FE, CNPS 1B	Found in the San Joaquin Valley and other parts of California in vernal pools within valley grassland, wetland, and riparian communities at elevations below 3,500 feet. Blooms May – September.	**Absent.** The APE does not provide suitable vernal pool habitat to support this species.

Species	Status*	Habitat	Occurrence within the APE
Madera leptosiphon (*Leptosiphon serrulatus*)	CNPS 1B	Found within openings of foothill woodland, often yellow-pine forest, and chaparral at elevations between 1,000 and 4,300 feet. Blooms April – May.	**Absent.** The APE does not provide suitable habitat and and is outside the elevational range of this species.
San Joaquin adobe sunburst (*Pseudobahia peirsonii*)	FT, CE, CNPS 1B	Found in the San Joaquin Valley and the Sierra Nevada foothills in bare, dark, clay soils in valley and foothill grassland and cismontane woodland communities at elevations between 300 and 3,000 feet. Blooms March – May.	**Absent.** Soils within the APE are not suitable for this species.
San Joaquin Valley Orcutt grass (*Orcuttia inaequalis*)	FT, CE, CNPS 1B	Found in the eastern San Joaquin Valley and the Sierra Nevada foothills in vernal pools within valley grassland, freshwater wetland, and wetland-riparian communities at elevations below 2,600 feet. Blooms April – September.	**Absent.** The APE does not provide suitable vernal pool habitat to support this species.
Sanford's arrowhead (*Sagittaria sanfordii*)	CNPS 1B	This species is an aquatic plant and is found in the San Joaquin Valley and other parts of California in freshwater marshes, ponds, canals, and ditches at elevations below 1,000 feet. Blooms May – October.	**Unlikely.** While the ponds could offer possible aquatic habitat for this species, surrounding areas are highly disturbed, especially the active cropland, residential areas, and ruderal habitat. The nearest recorded observation of this species within the vicinity was approximately 8.6 miles south of the APE in 1993.
Spiny-sepaled button-celery (*Eryngium spinosepalum*)	CNPS 1B	Found in the Sierra Nevada foothills and the San Joaquin Valley in vernal pools, swales, and roadside ditches. Often associated with clay soils in vernal pools within grassland communities. Occurs at elevations between 50 and 4,200 feet. Blooms April – July.	**Unlikely.** While the canal and pond habitat could potentially offer the aquatic habitat needed for this species, the soil was sandy/loamy and CNDDB lists the species as possibly extirpated from the area. The nearest recorded observation of this species within the vicinity was approximately 12.1 miles northeast of the APE in 1936.
Succulent owl's-clover (*Castilleja campestris* var. *succulenta*)	FT, CE, CNPS 1B	Occurs usually in wetlands and vernal pools but occasionally in non-wetlands. Often found in acidic soils at elevations below 2,500 feet. Blooms April – July.	**Absent.** The APE does not provide suitable vernal pool habitat to support this species.

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

Species	Status*	Habitat	Occurrence within the APE
American badger (*Taxidea taxus*)	CSSC	Prefers drier open stages of shrub, forest, and herbaceous habitats with friable soils to burrow, but can be found within numerous habitats throughout California, including the margins of agricultural lands. Needs a sufficient prey base of burrowing rodents.	**Unlikely.** The APE and surrounding areas are frequently disturbed residential, ruderal, and cropland areas that are unsuitable for this species. This species could potentially pass through/ forage within the APE, it is unlikely to establish dens there. The nearest recorded observation of this species within the vicinity was approximately 8.7 miles northeast of the APE in 1987 at a private residence in south Clovis. During 1987. The area surrounding the residence was far less developed and had adjacent vegetated fields.
Blunt-nosed leopard lizard (*Gambelia sila*)	FE, CE, CFP	Occurs in the San Joaquin Valley region in expansive, arid areas with scattered vegetation. Today they inhabit non-native grassland and alkali sink scrub communities of the valley floor marked by poorly drained, alkaline, and saline soils. They can be found at elevations ranging from approx. 100 to 2,600 feet. They are absent from areas with steep slopes and dense vegetation, and areas subject to seasonal flooding. Adults may excavate shallow burrows but rely on deeper pre-existing rodent burrows for hibernation and reproduction.	**Unlikely.** The non-native grassland habitat present did not have the appropriate soil type and was routinely disturbed by active cropland, industrial facilities, and residential areas surrounding the APE. There are no regional recorded observations of this species on the CNDDB.
Burrowing owl (*Athene cunicularia*)	CC, CSSC	Resides in open, dry grasslands, deserts, scrublands, and other areas with low growing vegetation. Nests and roosts underground in existing burrows created by mammals, most often by ground squirrels, and human-made structures.	**Possible.** California ground squirrel burrows were present at the APE. Foraging habitat and prey species were observed throughout the site. No signs of this species (whitewash, feathers, or owl pellets) were observed during the survey. The nearest recorded observation of this species within the vicinity was approximately 8.1 miles north of the APE in 1990.
California glossy snake (*Arizona elegans occidentalis*)	CSSC	Inhabits arid scrub, rocky washes, grasslands, and chaparral. Prefers open areas with loose soil for easy burrowing. This species occurs near the Pacific Coast ranges from the eastern part of the San	**Unlikely.** While the non-native grassland habitat had the appropriate soil for this species, the two records for this species in the region are from 1939 and 1893. The nearest recorded observation of this species within the vicinity was

Species	Status*	Habitat	Occurrence within the APE
		Francisco Bay Area south to northwestern Baja California but is absent along the central coast.	approximately 2.7 miles northwest of the APE in 1893.
California tiger salamander – central California DPS (*Ambystoma californiense*)	FT, CT	Requires vernal pools or seasonal ponds for breeding and small mammal burrows for aestivation. Generally found in grassland and oak savannah plant communities in central California from sea level to 1,500 feet in elevation. Can migrate up to 1.3 miles to breed.	**Unlikely**. The APE lacked vernal pools for breeding and the surrounding area was active cropland, industrial facilities, and residential areas. The nearest recorded observation was approximately 2.6 miles northwest of the APE in 1936.
Coast horned lizard (*Phrynosoma blainvillii*)	CSSC	Found in grasslands, coniferous forests, woodlands, and chaparral, primarily in open areas with patches of loose, sandy soil and low-lying vegetation in valleys, foothills, and semi-arid mountains. Frequently found near ant hills and along dirt roads in lowlands along sandy washes with scattered shrubs.	**Unlikely.** While the non-native grassland habitat had the appropriate soil, this species is listed as "possibly extirpated" from the region and the only recorded observation was from 1893, approximately 2.6 miles northwest of the APE.
Crotch's bumble bee (*Bombus crotchii*)	CCE	Occurs throughout coastal California, as well as east to the Sierra Nevada-Cascade crest, and south into Mexico. Food plant genera include snapdragons, scorpionweeds, primroses, poppies, and buckwheats. Nests are often located underground in abandoned rodent nests, or above ground in tufts of grass, old bird nests, rock piles, or cavities in dead trees. This species overwinters under leaf litter or soft soil.	**Unlikely.** While the APE featured foraging and nesting opportunity for this species, it is highly disturbed from the residential and industrial areas within/ adjacent to the APE as well as surrounding active cropland. The nearest recorded observation was approximately 2.6 miles northwest of the APE in 1899.
Fresno kangaroo rat (*Dipodomys nitratoides exilis*)	FE, CE	An inhabitant of alkali sinks and open grassland habitats in Merced, Kings, Fresno, and Madera counties. Prefers bare, alkaline, clay-based soils subject to seasonal inundation with more friable soil mounds around shrubs and grasses. The most recent recorded observation of this species in California was in 1992 in Fresno County.	**Absent.** Alkaline sinks are absent from the APE. The APE and surrounding areas are frequently disturbed from surrounding cropland, residential areas, and businesses. No signs of this species (tail drags, seed caches, etc.) were observed during the field surveys.
Least Bell's vireo (*Vireo bellii pusillus*)	FE, CE	This migratory species breeds in southern California. Breeding habitat consists of dense, low, shrubby, riparian vegetation in	**Absent.** The APE does not provide suitable riparian habitat to support this species.

Species	Status*	Habitat	Occurrence within the APE
		the vicinity of water or dry river bottoms. By the early 1980s, this species was extirpated from most of its historic range in California, including the Central Valley.	
Monarch butterfly (*Danaus plexippus*)	FPT	Roosts in wind-protected tree groves (eucalyptus, Monterey pine, cypress), with nectar and water sources nearby. Larval host plants consist of milkweeds. Winter roost sites extend along the Pacific Coast from northern Mendocino to Baja California, Mexico.	**Unlikely.** This species could travel through the APE during breeding season. Potential roosting habitat was present with the eucalyptus trees at the MHP but was marginal and highly disturbed with routine landscaping. The APE did have milkweed present but it was scarce and within the MHP.
Northern California legless lizard (*Anniella pulchra*)	CSSC	Found primarily underground, burrowing in loose, moist, and sandy soil. Forages in loose soil and leaf litter during the day. Occasionally observed on the surface at dusk and night.	**Unlikely.** The APE mapped outside of the current known range of this species. While MHP had the appropriate soil and leaf litter around the eucalyptus trees, the area is highly disturbed with the surrounding area being active cropland, industrial facilities, and residential areas. The nearest recorded observation was from the 1880's, approximately 2.6 miles northwest of the APE in foothill habitat. All other regional recorded observations have occurred in foothill habitat.
Northwestern pond turtle (*Actinemys marmorata*)	FPT, CSSC	An aquatic turtle of ponds, marshes, slow-moving rivers, streams, and irrigation ditches with riparian vegetation. Requires adequate basking sites and sandy banks or grassy open fields to deposit eggs.	**Possible**. The ponds within the APE offer banks for this species to use for basking and the nearby non-native grassland within the MHP could offer habitat for depositing eggs. While red-eared sliders were within that same area, it is possible for the two species to coexist. The nearest recorded observation was approximately 13.6 miles northeast of the APE in 2016.
Pallid bat (*Antrozous pallidus*)	CSSC	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 may also use tree cavities, caves, bridges, and other human-made structures.	**Unlikely.** While this species could utilize the non-native grassland habitat within the APE for foraging and the industrial buildings adjacent to the APE for roosting, the only recorded observation of this species was from 1909, approximately 5.8 miles northwest of the APE.

Species	Status*	Habitat	Occurrence within the APE
San Joaquin kit fox (*Vulpes macrotis mutica*)	FE, CT	Opportunistically forages in a variety of habitats. Dens in burrows within alkali sink, valley grassland, and woodland habitats in valleys and adjacent foothills and in human-made structures in cities, rangeland, and agricultural areas. Occurs in the San Joaquin Valley and other smaller valleys to the west.	**Unlikely.** While the non-native grassland and pastureland habitat within the APE offer foraging and possible denning habitat, no potential kit fox dens were identified during the survey. The APE is located 24.5 miles east of the Western Madera County satellite population with no corridor to allow for ease of travel. The nearest recorded observation was approximately 9.2 miles northeast of the APE in the 1980s.
Swainson's hawk (*Buteo swainsoni*)	CT	Nests in large trees in open areas adjacent to grasslands, grain or alfalfa fields, or livestock pastures suitable for supporting rodent populations.	**Possible.** This species can nest within the eucalyptus trees around the MHP and use the non-native grassland habitat to forage within the APE. No individuals or nests were observed during the survey. The nearest recorded observation was approximately 0.8 miles northwest of the APE in 2016.
Tricolored blackbird (*Agelaius tricolor*)	CT, CSSC	Nests colonially near fresh water in dense cattails or tules, or in thickets of riparian shrubs. Forages in grassland and cropland. Large colonies are often found foraging in dairy farm feed fields.	**Unlikely.** Suitable nesting habitat for this species was absent from the APE but the non-native grassland and pastureland habitats could be utilized for foraging. The nearest recorded observation of this species within the vicinity was approximately 9.5 miles north of the APE in 1975.
Valley elderberry longhorn beetle (*Desmocerus californicus dimorphus*)	FT	Lives in mature elderberry shrubs in the Central Valley and adjacent foothills from Tehama County south through Merced and Mariposa Counties with two scattered populations in Madera and Fresno Counties. Adults are active from March to June.	**Absent.** Elderberry shrubs required by this species were absent from the APE.
Vernal pool fairy shrimp (*Branchinecta lynchi*)	FT	Occupies vernal and seasonal pools, with clear to tea-colored water, in grass or mud-bottomed swales, and basalt depression pools.	**Absent.** Suitable vernal pool habitats required by this species were absent from the APE and surrounding areas.
Western mastiff bat (*Eumops perotis californicus*)	CSSC	Found in open, arid to semi-arid habitats, including dry desert washes, flood plains, chaparral, oak woodland, open ponderosa pine forest, grassland, and agricultural areas, where it feeds on insects in flight. Roosts most commonly in crevices in cliff	**Unlikely.** The APE lacked high buildings, cliff crevices and tunnels for this species to roost but this species could use the APE to forage. The nearest recorded observation was approximately 2.6 miles southwest of the APE in 1958.

Species	Status*	Habitat	Occurrence within the APE
		faces but may also use high buildings and tunnels.	
Western spadefoot (*Spea hammondii*)	FPT, CSSC	The majority of the time this species is terrestrial and occurs in small mammal burrows and soil cracks, sometimes in the bottom of dried pools. Prefers open areas with sandy or gravelly soils, in a variety of habitats including mixed woodlands, grasslands, coastal sage scrub, chaparral, sandy washes, lowlands, river floodplains, alluvial fans, playas, alkali flats, foothills, and mountains. Vernal or seasonal pools, that hold water for a minimum of three weeks, are necessary for breeding.	**Unlikely.** While there were small mammal burrow present, the APE and adjacent areas are very disturbed by active cropland, residential areas, and business facilities. The nearest recorded observation was at the San Joaquin River approximately 13.8 miles north of the APE in 1911.
Western yellow-billed cuckoo (*Coccyzus americanus occidentalis*)	FT, CE	Suitable nesting habitat in California includes dense riparian willow-cottonwood and mesquite habitats along a perennial river. Once common in the California Central Valley, as well as coastal valleys and riparian habitats east of the Sierra Nevada, habitat loss now constrains the California breeding population to small numbers of birds.	**Absent.** The APE does not provide suitable riparian habitat to support this species.

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

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

STATUS CODES

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

CNPS LISTING

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

3 IMPACTS AND MITIGATION

3.1 SIGNIFICANCE CRITERIA

3.1.1 CEQA

General plans, area plans, and specific projects are subject to the provisions of CEQA. The purpose of CEQA is to assess the impacts of proposed projects on the environment prior to project implementation. Impacts to biological resources are just one type of environmental impact assessed under CEQA and vary from project to project in terms of scope and magnitude. Projects that require removal of vegetation may result in the mortality or displacement of animals associated with this vegetation. Animals adapted to humans, roads, buildings, and pets may replace those species formerly occurring on a site. Plants and animals that are rare may be destroyed or displaced. Sensitive habitats such as wetlands and riparian woodlands may be altered or destroyed. Such impacts may be considered either "significant" or "less than significant" under CEQA. According to *CEQA Statute and Guidelines* (AEP 2023), "significant 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 interest. Specific project impacts to biological resources may be considered "significant" if they would:

- 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 CDFW or USFWS;
- 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 CDFW or USFWS;
- Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (CWA) (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means;
- 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;
- Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance; or
- Conflict with the provisions of an adopted Habitat Conservation Plan (HCP), Natural Community Conservation Plan (NCCP), or other approved local, regional, or state HCP.

Furthermore, CEQA Guidelines Section 15065(a) states that a project may trigger the requirement to make a "mandatory finding of significance" if the project has the potential to:

> "Substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, 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."

3.1.2 NEPA

Federal projects are subject to the provisions of NEPA. The purpose of NEPA is to assess the effects of a proposed action on the human environment, assess the significance of those effects, and recommend measures that if implemented would mitigate those effects. As used in NEPA, a determination that certain

effects on the human environment are "significant" requires considerations of both context and intensity (40 Code of Federal Regulations (CFR) 1508.27).

For the purposes of assessing effects of an action on biological resources, the relevant context is often local. The analysis may, however, require a comparison of the action area's biological resources with the biological resources of an entire region. Project activities must have a federal nexus and discuss federally listed species, and/or designated critical habitat that may be affected in the action area.

Federal agencies are required to determine whether their actions may affect listed or proposed species and designated critical habitat. The primary role of this document is to provide agencies conclusion and the rationale to support those conclusions regarding the effects of any proposed actions of the project on protected resources. Document content and recommended elements are identified in 50 CFR 402.12(f).

Under section 7 of the Endangered Species Act, federal agencies must consult with National Oceanic and Atmospheric Administration Fisheries or the USFWS, depending on the species, through an informal or formal consultation when any action the agency carries out, funds, or authorizes may affect either a species listed as threatened or endangered under the Act, or any critical habitat designated for it.

Once resources are assessed an Endangered Species Act Section 7 finding needs to be made regarding proposed or listed species and/or designated critical habitat that may be present in the project area. This report will provide the necessary information for the lead federal agency to make a determination on affects. This finding may result in one of the following determinations:

- *"*No effect*"* - means there will be no impacts, positive or negative, to listed or proposed resources. Generally, this means no listed resources will be exposed to action and its environmental consequences. Concurrence from the Service is not required.
- *"*May affect, but not likely to adversely affect" means that all effects are beneficial, insignificant, or discountable. Beneficial effects have contemporaneous positive effects without any adverse effects to the species or habitat. Insignificant effects relate to the size of the impact and include those effects that are undetectable, not measurable, or cannot be evaluated. Discountable effects are those extremely unlikely to occur. These determinations require written concurrence from the Service.
- *"*May affect, likely to adversely affect" means that listed resources are likely to be exposed to the action or its environmental consequences and will respond in a negative manner to the exposure.

3.2 RELEVANT GOALS, POLICIES, AND LAWS

3.2.1 FRESNO COUNTY ORDINANCE

The Fresno County (County) General Plan contains the following goals and policies related to the project:

3.2.1.1.1 WESTSIDE RANGELANDS

Policy LU-B.13: The County shall require applicants to identify biological resources to determine if there are sensitive and/or important flora and fauna that require special protection measures.

3.2.1.1.2 RURAL RESIDENTIAL DEVELOPMENT

Policy LU-E.12: The County shall ensure through discretionary permit approvals and other development regulations that development within areas designated Rural Residential does not encroach upon natural water channels or restrict natural water channels in such a way as to increase potential flooding damage. Land divisions shall not render inoperative any existing channel.

3.2.1.1.3 WETLAND AND RIPARIAN AREAS

Policy OS-D.1: The County shall support the "no-net-loss" wetlands policies of the USACE, the USFWS, and the CDFW. Coordination with these agencies at all levels of project review shall continue to ensure that appropriate mitigation measures and the concerns of these agencies are adequately addressed.

Policy OS-D.2: The County shall require new development to fully mitigate wetland loss for function and value in regulated wetlands to achieve "no-net-loss" through any combination of avoidance, minimization, or compensation. The County shall support mitigation banking programs that provide the opportunity to mitigate impacts to rare, threatened, and endangered species and/or the habitat which supports these species in wetland and riparian areas.

Policy OS-D.3: The County shall require development to be designed in such a manner that pollutants and siltation do not significantly degrade the area, value, or function of wetlands. The County shall require new developments to implement the use of Best Management Practices (BMPs) to aid in this effort.

Policy OS-D.4: The County shall require riparian protection zones around natural watercourses and shall recognize that these areas provide highly valuable wildlife habitat. Riparian protection zones shall include the bed and bank of both low- and high-flow channels and associated riparian vegetation, the band of riparian vegetation outside the high-flow channel, and buffers of 100 feet in width as measured from the top of the bank of unvegetated channels and 50 feet in width as measured from the outer edge of the dripline of riparian vegetation.

Policy OS-A.5 The County shall strive to identify and conserve remaining upland habitat areas adjacent to wetland and riparian areas that are critical to the feeding, hibernation, or nesting of wildlife species associated with these wetland and riparian areas.

Policy OS-A.7: The County shall support the management of wetland and riparian plant communities for passive recreation, groundwater recharge, nutrient storage, and wildlife habitats.

3.2.1.1.4 FISH AND WILDLIFE HABITAT

Policy OS-E.1: The County shall support efforts to avoid the "net" loss of important wildlife habitat where practicable. In cases where habitat loss cannot be avoided, the County shall impose adequate mitigation for the loss of wildlife habitat that is critical to supporting special-status species and/or other valuable or unique wildlife resources. Mitigation shall be at sufficient ratios to replace the function and value of the habitat that was removed or degraded. Mitigation may be achieved through any combination of creation, restoration, conservation easements, and/or mitigation banking. Conservation easements should include provisions for maintenance and management in perpetuity. The County shall recommend coordination with the USFWS and the CDFW to ensure that appropriate mitigation measures and the concerns of these agencies are adequately addressed. Important habitat and habitat components include nesting, breeding, and foraging areas, important spawning grounds, migratory routes, migratory stopover areas, oak woodlands, vernal pools, wildlife movement corridors, and other unique wildlife habitats (e.g., alkali scrub) critical to protecting and sustaining wildlife populations.

Policy OS-E.2: The County shall require adequate buffer zones between construction activities and significant wildlife resources, including both onsite habitats that are purposely avoided and significant habitats that are adjacent to the project site, in order to avoid the degradation and disruption of critical life cycle activities such as breeding and feeding. The width of the buffer zone should vary depending on the location, species, etc. A final determination shall be made based on informal consultation with the USFWS and/or the CDFW.

Policy OS-E.3: The County shall require development in areas known to have particular value for wildlife to be carefully planned and, where possible, located so that the value of the habitat for wildlife is maintained.

Policy OS-E.5: The County shall support preservation of habitats of rare, threatened, endangered, and/or other special-status species including fisheries. The County shall consider developing a formal Habitat Conservation Plan in consultation with Federal and State agencies, as well as other resource conservation organizations. Such a plan should provide a mechanism for the acquisition and management of lands that support special-status species.

Policy OS-E.9 The County shall require, as part of any required environmental review process, a biological resources evaluation of the project site by a qualified biologist. The evaluation shall be based on field reconnaissance performed at the appropriate time of year to determine the presence or absence of significant resources and/or special-status plants or animals. Such evaluation will consider the potential for significant impact on these resources and will either identify feasible mitigation measures or indicate why mitigation is not feasible.

Policy OS-E.15 The County shall preserve, to the maximum extent practicable, significant wildlife migration routes such as the North Kings Deer Herd migration corridors and fawn production areas.

Policy OS-E.19: The County shall For development projects on sites where tree or vegetation/habitat removal is necessary and where the existence of sensitive species and/or bird species protected by California Fish and Wildlife Code Sections 3503 and 3503.5 and Migratory Bird Treaty Act has been determined by a qualified biologist, surveys for nesting birds shall be conducted within 14 days prior to project activities by a qualified biologist for all construction sites where activities occurring during nesting bird season (February 1 through September 15). The surveys shall include the entire disturbance area plus at least a 500-foot buffer around the project site. If active nests are located, all construction work shall be conducted outside a buffer zone from the nest to be determined by the qualified biologist. The buffer shall be a minimum of 250 feet for non-raptor bird species and at least 500 feet for raptor species, unless determined otherwise by the qualified biologist. Buffer distances for bird nests shall be site-specific and an appropriate distance, as determined by a qualified biologist. The buffer distances shall be specified to protect the bird's normal behavior thereby preventing nesting failure or abandonment. The buffer distance recommendation shall be developed after field investigations that evaluate the bird(s) apparent distress in the presence of people or equipment at various distances. Abnormal nesting behaviors which may cause reproductive harm include, but are not limited to, defensive flights/vocalizations directed towards project personnel, standing up from a brooding position, and flying away from the nest. The qualified biologist shall have authority to order the cessation of all nearby project activities if the nesting birds exhibit abnormal behavior which may cause reproductive failure (nest abandonment and loss of eggs and/or young) until an appropriate buffer is established. Larger buffers may be required depending upon the status of the nest and the construction activities occurring in the vicinity of the nest. The buffer area(s) shall be closed to all construction personnel and equipment until the adults and young are no longer reliant on the nest site. A qualified biologist shall confirm that breeding/nesting is completed, and young have fledged the nest prior to removal of the buffer. The biologist shall submit a report of these preconstruction nesting bird surveys to the County to document compliance within 30 days of its completion.

3.2.1.1.5 VEGETATION

Policy OS-F.3: The County shall support the preservation of significant areas of natural vegetation, including, but not limited to, oak woodlands, riparian areas, and vernal pools.

Policy OS- F.5: The County shall establish procedures for identifying and preserving rare, threatened, and endangered plant species that may be adversely affected by public or private development projects. As part of this process, the County shall require, as part of the environmental review process, a biological resources evaluation of the project site by a qualified biologist. The evaluation shall be based on field reconnaissance performed at the appropriate time of year to determine the presence or absence of significant plant resources and/or special-status plant species. Such evaluation shall consider the potential for significant impact on these resources and shall either identify feasible mitigation measures or indicate why mitigation is not feasible.

3.2.2 THREATENED AND ENDANGERED SPECIES

Permits may be required from CDFW and/or USFWS if activities associated with a project have the potential to result in the "take" of a species listed as threatened or endangered under the California Endangered Species Act (CESA) and/or Endangered Species Act (ESA), respectively. Take is defined by CESA as, "to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture or kill" (California Fish and Game Code, Section 86). Take is more broadly defined by the ESA to include "harm" (16 USC, Section 1532(19), 50 CFR, Section 17.3). CDFW and USFWS are responsible agencies under CEQA and NEPA. Both agencies review CEQA and NEPA documents in order to determine the adequacy of the treatment of endangered species issues and to make project-specific recommendations for their conservation.

3.2.3 DESIGNATED CRITICAL HABITAT

When species are listed as threatened or endangered, the USFWS often designates areas of "critical habitat" as defined by section 3(5)(A) of the ESA. Critical habitat is a term defined in the ESA as a specific geographic area that contains features essential for the conservation of a threatened or endangered species and that may require special management and protection. Critical habitat is a tool that supports the continued conservation of imperiled species by guiding cooperation with the federal government. Designations only affect federal agency actions or federally funded or permitted activities. Critical habitat does not prevent activities that occur within the designated area. Only activities that involve a federal permit, license, or funding and are likely to destroy or adversely modify critical habitat will be affected.

3.2.4 MIGRATORY BIRDS

The Migratory Bird Treaty Act (MBTA: 16 USC 703-712) prohibits killing, possessing, or trading in any bird species covered in one of four international conventions to which the United States is a party, except in accordance with regulations prescribed by the Secretary of the Interior. The name of the act is misleading, as it covers almost all bird's native to the United States, even those that are non-migratory. The MBTA encompasses whole birds, parts of birds, and bird nests and eggs. Additionally, California Fish and Game Code makes it unlawful to take or possess any non-game birds covered by the MBTA (Section 3513), as well as any other native non-game birds (Section 3800).

3.2.5 BIRDS OF PREY

Birds of prey are protected in California under provisions of California Fish and Game Code (Section 3503.5), which states that it is unlawful to take, possess, or destroy any birds in the order Falconiformes (hawks and eagles) or Strigiformes (owls), as well as their nests and eggs. The bald eagle and golden eagle are afforded additional protection under the Bald and Golden Eagle Protection Act (16 USC 668), which makes it unlawful to kill birds or their eggs, or take feathers or nests, without a permit issued by the U.S. Secretary of the Interior.

3.2.6 NESTING BIRDS

In California, protection is afforded to the nests and eggs of all birds. California Fish and Game Code (Section 3503) states that it is "unlawful to take, possess, or needlessly destroy the nest or eggs of any bird except

as otherwise provided by this code or any regulation adopted pursuant thereto." Breeding-season disturbance that causes nest abandonment and/or loss of reproductive effort is considered a form of "take" by the CDFW.

3.2.7 WETLANDS AND OTHER "JURISDICTIONAL WATERS"

Aquatic resources, including wetlands, streams, rivers, and lakes, are among the important biological resources that are protected by local, state, and federal laws and regulations. Activities that impact these "jurisdictional waters" may be regulated and require permits which aim to avoid or minimize adverse impacts to "jurisdictional waters" to the greatest extent possible. The definition of a jurisdictional water may vary depending on the regulatory agency, and the limits of jurisdiction for each agency are described below.

The USACE, pursuant to Section 404 of the Clean Water Act (CWA), upholds a set of guidelines to regulate activities that could result in the discharge of pollutants into "waters of the United States" ("WOTUS"). The legal definition of WOTUS has significantly evolved since the passage of the CWA in 1972 as a result of administrative rulings and litigation involving federal jurisdiction over water resources. Thus, the reach and extent of USACE and United States Environmental Protection Agency (USEPA) jurisdiction over aquatic features has continually been subject to revision.

The current administrative definition of WOTUS is described in the Biden Administration's 2023 "Conforming Rule." The extent of jurisdiction has been defined in the Code of Federal Regulations (CFR) but is also subject to interpretation by the federal courts. Jurisdictional waters generally include the following categories defined by section 328.3, subdivision (a) of title 33 of the CFR:

1) *Traditional Navigable Waters, the territorial seas, or interstate waters (not including interstate wetlands);*
2) *Impoundments of waters of the United States;*
3) *Tributaries of:*
    a. *Traditional Navigable Waters, territorial seas, or interstate waters (not including interstate wetlands); or*
    b. *Impoundments of water of the United States when the tributaries meet the relatively permanent standard.*
4) *Wetlands:*
    a. *Adjacent to Traditional Navigable Waters, the territorial seas, or interstate waters;*
    b. *Adjacent to and with a continuous surface connection to relatively permanent impoundments of waters of the United States*
    c. *Adjacent to and with a continuous surface connection to relatively permanent jurisdictional tributaries.*
5) *Intrastate lakes and ponds not identified in items 1 through 4 of this section that are relatively permanent, standing or continuously flowing bodies of water with a continuous surface connection to the waters identified in items 1 or 3 above.*

Exclusions under the new definition include the following:

1) *Waste treatment systems, including treatment ponds or lagoons, designed to meet the requirements of the CWA;*
2) *Prior converted cropland designated by the Secretary of Agriculture. The exclusion would cease upon a change of use, which means that the area is no longer available for the production of agricultural commodities. Notwithstanding the determination of an area's status as prior*

converted cropland by any other Federal agency, for the purposes of the CWA, the final authority regarding CWA jurisdiction remains with USEPA;

3) *Ditches (including roadside ditches) excavated wholly in and draining only dry land and that do not carry a relatively permanent flow of water;*
4) *Artificially irrigated areas that would revert to dry land if the irrigation ceased;*
5) *Artificial lakes or ponds created by excavating or diking dry land to collect and retain water and which are used exclusively for such purposes as stock watering, irrigation, settling basins, or rice growing;*
6) *Artificial reflecting or swimming pools or other small ornamental bodies of water created by excavating or diking dry land to retain water for primarily aesthetic reasons;*
7) *Waterfilled depressions created in dry land incidental to construction activity and pits excavated in dry land for the purpose of obtaining fill, sand, or gravel unless and until the construction or excavation operation is abandoned and the resulting body of water meets the definition of waters of the United States; and*
8) *Swales and erosional features (e.g., gullies, small washes) characterized by low volume, infrequent, or short duration flow.*

The Department of the Army, acting through the USACE, regulates the filling or excavation of jurisdictional waters and is authorized to issue permits for activities within WOTUS under the authority of Section 404 of the CWA. The extent of jurisdiction is defined by an "ordinary high-water mark" on opposing channel banks.

The State of California also asserts jurisdiction over drainages, wetlands, and other aquatic features. The limits of State jurisdiction differ from those of the USEPA and USACE, often being more inclusive of water resources. The California Department of Fish and Wildlife has jurisdiction over the bed and bank of rivers, natural drainages, streams, and lakes and regulates alteration to these features pursuant to the provisions of Section 1601 and 1602 of the California Fish and Game Code. Activities to alter these features would require a Lake or Streambed Alteration Agreement from CDFW, which could include mitigation measures for aquatic and biological resources that could be affected by project activities.

The SWRCB, under the Porter-Cologne Water Quality Control Act of 1969, holds regulatory authority over activities affecting water quality of all surface water and groundwater in California, collectively known as "waters of the state." Discharges into waters of the state that are also WOTUS require a CWA Section 401 Water Quality Certification from the appropriate regional office as a prerequisite to obtaining certain federal permits, such as a CWA Section 404 permit. Discharges into all Waters of the State, even those that are not also WOTUS, require waste discharge requirements (WDRs), or waivers of WDRs, from the RWQCB. The RWQCB also administers the Construction Storm Water Program and the federal National Pollutant Discharge Elimination System (NPDES) program. Projects that disturb one acre or more of soil must obtain a Construction General Permit under the Construction Storm Water Program. A prerequisite for this permit is the development of a Storm Water Pollution Prevention Plan (SWPPP) by a certified Qualified SWPPP Developer. Projects that discharge wastewater, storm water, or other pollutants into a WOTUS may require an NPDES permit.

3.3 POTENTIALLY SIGNIFICANT PROJECT-RELATED IMPACTS AND MITIGATION

Species protected by California Fish and Game Code, CDFW, USFWS, CEQA, or NEPA that have the potential to be impacted by project activities include: burrowing owl (or "BUOW"), northwestern pond turtle, and Swainson's hawk. Other sensitive resources that have the potential to be impacted by the project include wildlife movement corridors and native wildlife nursery sites. Corresponding mitigation measures can be found below.

3.3.1 GENERAL PROJECT-RELATED IMPACTS

The project has the potential to impact a number of sensitive resources, as described in more detail in the following sections. Impacts to these resources would be a violation of state and federal laws or considered a potentially significant impact under CEQA and NEPA. Implementation of the following measures will help reduce potential impacts to these resources to a less than significant level under CEQA and NEPA and will help with complying with state and federal laws protecting these resources:

Mitigation Measure BIO-1a (*WEAP Training*): Prior to initiating construction activities (including staging and mobilization), all personnel associated with project construction will attend a mandatory Worker Environmental Awareness Program (WEAP) training, conducted by a qualified biologist (someone familiar with the identification and habitats of these species), to aid workers in identifying special status resources that may occur in the APE. The specifics of this program will include identification of the sensitive species and suitable habitats, a description of the regulatory status and general ecological characteristics of sensitive resources, and review of the limits of construction and mitigation measures required to reduce impacts to biological resources within the work area. This training will discuss special status species, describe the laws and regulations in place to provide protection of these species, identify the penalties for violation of applicable environmental laws and regulations, and include a list of required protective measures to avoid "take." A fact sheet summarizing this information, along with photographs or illustrations of sensitive species with potential to occur on the APE, will also be prepared for distribution to all contractors, their employees, and all other personnel involved with construction of the project. All trainees will sign a form documenting that they have attended WEAP training and understand the information presented to them.

Mitigation Measure BIO-1b (*BMPs*): The project proponent will require that all workers employ the following BMPs in order to avoid and minimize potential impacts to special status species:

- Vehicles will observe a 15-mph speed limit while on unpaved access routes.
- All open trenches, holes, sumps, and other excavations greater than 6-inches with sidewalls steeper than a 1:1 (45 degree) slope will have an escape ramp of earth or a non-slip material with a less than 1:1 slope or these will be covered with barrier material such that animals are unable to dig or squeeze under the barrier and become entrapped.
- Workers will inspect areas beneath parked vehicles, equipment, and materials prior to mobilization. If special status species are detected, the individual will either be allowed to leave of its own volition or will be captured by the qualified biologist (must possess appropriate collecting/handling permits) and relocated out of harm's way to the nearest suitable habitat beyond the influence of the project work area. "Take" of a state or federal special status (rare, California Species of Special Concern, threatened, or endangered) species is prohibited without the necessary federal or state take permit(s).
- The presence of any special status species will be reported to the project's qualified biologist, who will submit the occurrence to the CNDDB. If necessary, the biologist will report the occurrence to CDFW and/or USFWS.

3.3.2 PROJECT-RELATED MORTALITY AND/OR NEST ABANDONMENT OF MIGRATORY BIRDS, RAPTORS, AND SPECIAL STATUS BIRDS

The site and adjacent areas contain suitable nesting and foraging habitat for a variety of protected bird species, such as migratory birds, raptors, and special status birds including Swainson's hawk. It is anticipated that during the nesting bird season, protected birds could nest on the ground or in shrubs and trees within, and adjacent to, the site and forage within the site. Protected birds located within or adjacent to the site

during construction have the potential to be injured or killed by project-related activities. In addition to the direct "take" of protected birds within the site and adjacent areas, these birds nesting in these areas could be disturbed by project-related activities resulting in nest abandonment. Projects that adversely affect the nesting success of protected birds or result in the mortality of these birds would be a violation of state and federal laws and considered a potentially significant impact under CEQA and NEPA.

While foraging habitat for protected birds, such as BUOW and Swainson hawk, is present on the site, suitable foraging habitat is located adjacent to the site and within the vicinity of the site. Loss of the foraging habitat from implementation of the project is not considered a significant impact.

Implementation of the following measures will reduce potential impacts to protected nesting birds to a less than significant level under CEQA and NEPA and will help the project comply with state and federal laws protecting these bird species. Mitigation measures specific to BUOW are presented in Section 3.3.3 (i.e., BIO-3a - BIO-3c).

> Mitigation Measure BIO-2a (*Avoidance*): The project's construction activities will occur, if feasible, between September 16 and January 31 (outside of the nesting bird season) to avoid impacts to nesting birds.
>
> Mitigation Measure BIO-2b (*Pre-construction Surveys*): If activities must occur within nesting bird season (February 1 to September 15), a qualified biologist will conduct a one-time take avoidance survey for Swainson's hawk nests onsite and within a 0.5-mile radius within ten (10) calendar days prior to the start of construction. This survey will be conducted in accordance with the *Recommended Timing and Methodology for Swainson's Hawk Nesting Surveys in California's Central Valley* (Swainson's Hawk Technical Advisory Committee 2000), or current guidance. The survey would also include inspecting for nesting migratory birds within up to 50 feet outside of the APE and for other nesting raptors within up to 450 feet outside of the APE. All raptor nests would be considered "active" upon the nest-building stage. If no active nests are observed, no further mitigation is required. If construction is delayed or halted for more than ten (10) days, another pre-construction survey for nesting birds will be conducted.
>
> Mitigation Measure BIO-2c (*Avoidance Buffers*): On discovery of any active nests or breeding colonies near work areas, a qualified biologist will determine appropriate avoidance buffer distances based on applicable CDFW and/or USFWS guidelines, the biology of the species, conditions of the nest(s), and the level of project disturbance.

3.3.3 PROJECT-RELATED MORTALITY AND/OR DISTURBANCE TO BURROWING OWL

As discussed in Section 2.6, the site contained suitable foraging habitat for BUOW, and this species also may nest or roost within burrows within, or adjacent to, the site. Construction activities that adversely affect the nesting success of BUOWs or result in the mortality of individuals constitute a violation of state and federal laws and would be considered a significant impact under CEQA and NEPA. While the APE may remove some potential nesting/roosting and foraging habitat for BUOW, there is abundant habitat adjacent to the site that could be used, and implementation of the project would not significantly reduce potential nesting, roosting, and foraging habitat for this species. Therefore, no mitigation measures are warranted for loss of BUOW nesting/roosting and foraging habitat.

Implementation of the following measures would reduce potential impacts to nesting and roosting BUOW to a less than significant level under CEQA and NEPA and help the project comply with state and federal laws protecting this avian species.

Mitigation Measure BIO-3a (*Pre-construction Take Avoidance Survey*): A qualified biologist (someone familiar with the identification and sign of this species) will conduct a pre-construction take avoidance survey for BUOW and suitable burrows, in accordance with CDFW's *Staff Report on Burrowing Owl Mitigation* (2012), within seven (7) days prior to the start of construction activities. The survey will include the proposed work area and accessible surrounding land up to 500 feet. If construction is delayed or halted for more than seven (7) days, another pre-construction survey for BUOW will be conducted. If no BUOW individuals or active burrows are observed, no further mitigation is required.

Mitigation Measure BIO-3b (*Avoidance*): If an active BUOW burrow is detected, avoidance buffers will be implemented. A qualified biologist will determine appropriate avoidance buffer distances based on CDFW's 2012 *Staff Report on Burrowing Owl Mitigation*, the biology of BUOW, conditions of the burrow(s), and the level of project disturbance. If necessary, avoidance buffers will be identified with flagging, fencing, or other easily visible means, and will be maintained until the biologist has determined that the nestlings have fledged and all BUOW have left the project area.

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

Recommendation BIO-3c (*ITP* and *Passive Relocation*): If an active BUOW burrow is detected within the proposed work area and cannot be avoided, it is recommended the project obtain an Incidental Take Permit (ITP) in order to implement protection plans and/or relocation plans in consultation with CDFW and/or USFWS and protect the project from "take" of this species.

3.3.4 PROJECT-RELATED MORTALITY AND/OR DISTURBANCE TO NORTHWESTERN POND TURTLE

The APE contained ponds at both the MHP and WWTF which could be used by northwestern pond turtle for dispersal and basking. The non-native grassland and pastureland habitat of the APE could be used by northwestern pond turtle for nesting and foraging. Upland areas would be temporarily impacted through project activities. Noise, vegetation removal, movement of workers, construction, and ground disturbance as a result of project activities have the potential to significantly impact northwestern pond turtle. Potentially significant impacts associated with project activities could include inadvertent entrapment or direct mortality. Project activities that impact northwestern pond turtles would be considered a potentially significant impact under CEQA and NEPA.

The following measures will be implemented prior to the start of construction and will reduce impacts to northwestern pond turtle to a less than significant level under CEQA and NEPA:

Mitigation Measure BIO-4a (*Pre-construction Survey and Avoidance Buffers*): Within seven (7) days prior to the start of construction, a qualified biologist (someone familiar with the identification and habitat of this species) will conduct a pre-construction survey for northwestern pond turtle within the APE and surrounding areas up to 330 feet. Pre-construction surveys will be conducted in accordance with the draft *Western Pond Turtle (Emys marmorata) Visual Survey Protocol for the Southcoast Ecoregion* (United States Geological Survey 2006), or current guidance. If no northwestern pond turtles are observed during the pre-construction survey, then construction activities may begin. If construction is delayed or halted for more than seven (7) days, another pre-construction survey for northwestern pond turtle will be conducted. If the surveys results in the

identification of a northwestern pond turtle or an individual is found on the APE during construction activities, it will be allowed to leave the APE on its own and the qualified biologist will determine appropriate buffers to be implemented to avoid impacts to the individual(s).

Mitigation Measure BIO-4b (*Monitor*): If northwestern pond turtles are observed on the APE, a qualified biologist will conduct a pre-activity clearance survey each day and remain on the APE to oversee all vegetation clearing and ground disturbing activities until the individual(s) have left the APE.

Mitigation Measure BIO-4c (*Formal Consultation*): Should northwestern pond turtles get listed in this area and the project/qualified biologist needs to move an individual, consultation for protection plans and/or relocation plans with the appropriate agencies will be completed to avoid take.

3.3.5 PROJECT-RELATED IMPACTS TO REGULATED WATERS, WETLANDS, AND WATER QUALITY

The project involves the demolishing of equipment in the dissolved air flotation basin, installing one recirculating pump, installing oil and grease removal in grit chamber, modifying the air piping, installing recirculation flow meter and sludge flow meters, removal of berms between three ponds, replacing one influent pump, replacing one blower, and constructing new circular clarifiers at the WWTF and constructing a new lift station, force main, and a gravity sewer main at the MHP. According to the USFWS NWI Map, Central Canal, Washington Colony Canal, and Oleander Canal were classified as riverine. Additionally, the ponds located at the WWTF and MHP are classified as freshwater ponds. Project-related impacts to some or all of these waters would be considered a potentially significant impact under CEQA and NEPA. Impacts to waters of the U.S. are also subject to the permit requirements of Sections 401 and 404 of the Clean Water Act and impacts to waters of the state are subject to the permit requirements of Section 401 of the Clean Water Act and California Fish and Game Code. The placement of fill within any wetlands or other jurisdictional features will require a 401 Water Quality Certification from the RWQCB, 404 permit from the USACE, and a Lake or Streambed Alteration Agreement from CDFW.

There are no designated wild and scenic rivers within the APE; therefore, the project would not result in direct impacts to wild and scenic rivers.

If construction involves ground disturbance over an area greater than one acre, the project would need to obtain a Construction General Permit under the Construction Storm Water Program administered by the RWQCB. A prerequisite for this permit is the development of a Storm Water Pollution Prevention Plan to ensure construction activities do not adversely affect water quality. This plan will need to be prepared in support of the Construction General Permit application.

Implementation of the following measures will reduce potential impacts to waters to a less than significant level under CEQA and NEPA and will ensure compliance with state and federal laws protecting these waters.

Mitigation Measure BIO-6 (*Permits*): If the project intends to impact jurisdictional waters, permits with USACE, RWQCB, and/or CDFW will be obtained to comply with state and federal regulations, if necessary. These permits, certifications, and agreements would ensure impacts to waters are minimized to the extent possible and permanent impacts would be offset by compensatory mitigation.

3.3.6 PROJECT-RELATED IMPACTS TO WILDLIFE MOVEMENT CORRIDORS AND NATIVE WILDLIFE NURSERY SITES

Wildlife movement corridors are routes that animals regularly and predictably follow during seasonal migration, dispersal from native ranges, daily travel within home ranges, and inter-population movements. Movement corridors in California are typically associated with valleys, ridgelines, rivers, and creeks supporting riparian vegetation. The canal habitat could potentially act as a corridor for terrestrial wildlife during the dry season and aquatic species when water is present, however, the surrounding area is highly disturbed and would discourage use of the canal for dispersal activities.

Native wildlife nursery sites are areas where a species or group of similar species raise their young in a concentrated place, such as maternity bat roosts. The eucalyptus trees located within the APE could function as native wildlife nursery sites for birds. The active pond at the WWTF was being used as wildlife nursery sites for waterfowl species which were observed during the survey.

The canal habitat within the APE could be used as a wildlife movement corridor, but impacts would be temporary and minimal, and wildlife can use the surrounding area to travel during construction and would be able to continue utilizing the features after construction activities are completed.

The APE has suitable features that could be used as native wildlife nursery sites. Eucalyptus trees with natural cavities were located adjacent to the APE and could function as native wildlife nursery sites for birds.

The potential impacts to species that could use the trees as a wildlife nursery site have been addressed in Mitigation Measures BIO-2a – BIO-2c. Implementation of these will reduce potential impacts to native wildlife nursery sites to a less than significant level under CEQA.

3.3.7 PROJECT-RELATED IMPACTS TO WILDLIFE MOVEMENT CORRIDORS AND NATIVE WILDLIFE NURSERY SITES

The three canals within the APE could be potentially used as a wildlife movement corridor, but disturbance to these canals would be temporary in nature and would not disturb wildlife movement. Furthermore, the APE is in an area regularly disturbed by humans which would discourage dispersal and migration.

The APE had eucalyptus trees that could be used by nesting birds, which are considered native wildlife nursery sites. The potential impacts to nesting birds have been addressed in Mitigation Measures BIO-2a-BIO-2c. It is unlikely other native species will utilize any features of the APE as a wildlife nursery site.

Most of the APE does not contain features that would be likely to function as wildlife movement corridors. All canals within could be potentially used as a wildlife movement corridor, but disturbance to this canal would be temporary in nature and would not disturb wildlife movement. Furthermore, the project is in an area regularly disturbed by humans which would discourage dispersal and migration.

3.4 SECTION 7 DETERMINATIONS

In addition to the occurrence analysis performed in Table 2 and Table 3 of this document, Table 4 summarizes project effect determinations for federally-listed species found on the CNDDB list generated on April 14, 2025, and the USFWS IPaC list generated on April 14, 2025 (see Appendix B and Appendix C, respectively), in accordance with Section 7 of the Endangered Species Act.

Table 4: Section 7 Determinations

Species	Determination	Rationale for Determination
Blunt-nosed leopard lizard (*Gambelia sila*)	No effect	**Habitat absent**. Grassland habitat with poorly drained, saline soil was absent from within the APE and surrounding lands
California jewelflower (*Caulanthus californicus*)	No effect	**Habitat absent.** Species is extirpated from the region the APE is located.
California tiger salamander *(Ambystoma californiense)*	No effect	**Habitat absent.** No vernal pools were present for breeding and the APE was highly disturbed.
Fresno kangaroo rat (*Dipodomys nitratoides exilis*)	No effect	**Habitat absent.** Alkaline sink habitat was absent within the APE and surrounding lands.
Greene's tuctoria *(Tuctoria greenei)*	No effect	**Habitat absent**. Vernal pool habitat was absent within the APE and surrounding lands.
Least Bell's vireo (*Vireo bellii pusillus*)	No effect	**Habitat absent.** APE is outside of the known distribution range of this species.
Monarch butterfly (*Danaus plexippus*)	No effect	**Habitat absent.** While the site contained possible foraging and roosting habitat, both were marginal and highly disturbed from the habitat within and adjacent to the APE.
Northwestern pond turtle (*Actinemys marmorata*)	May affect, but not likely to adversely affect	**Habitat present**. Habitat for basking and egg depositing were present within the APE (specifically at the MHP). Implementation of mitigation measure **BIO-4a** – **BIO-4c** would reduce effects to not likely to adversely affect.
San Joaquin adobe sunburst *(Pseudobahia peirsonii)*	No effect	**Habitat absent**. Foothill grassland and cismontane woodland habitat with clay soil was absent within the APE and surrounding lands.
San Joaquin kit fox (*Vulpes macrotis mutica*)	No effect	**Habitat absent.** The APE and surrounding areas contained disturbed grassland habitat that can be used for denning and foraging but is not accessible from the nearest satellite population.
San Joaquin Valley Orcutt grass *(Orcuttia inaequalis)*	No effect	**Habitat absent**. Vernal pool habitat was absent within the APE and surrounding lands.
Succulent owl's-clover (*Castilleja campestris* var. *succulenta*)	No effect	**Habitat absent**. Vernal pool habitat was absent within the APE and surrounding lands.
Valley elderberry longhorn beetle (*Desmocerus californicus dimorphus*)	No effect	**Habitat absent**. Elderberry plants was absent within the APE and surrounding lands.
Vernal pool fairy shrimp (*Branchinecta lynchi*)	No effect	**Habitat absent**. Vernal pool habitat was absent within the APE and surrounding lands.
Western spadefoot (*Spea hammondii*)	No effect	**Habitat absent.** The APE and surrounding areas contained aquatic and upland habitat this species could utilize but is highly disturbed.
Western yellow-billed cuckoo (*Coccyzus americanus occidentalis*)	No effect	**Habitat absent**. Riparian habitat was absent within the APE and surrounding lands.

3.5 LESS THAN SIGNIFICANT PROJECT-RELATED IMPACTS

3.5.1 PROJECT-RELATED IMPACTS TO SPECIAL STATUS PLANT SPECIES ABSENT FROM, OR UNLIKELY TO OCCUR ON, THE APE

Of the 12 regionally occurring special status plant species, all 12 are considered absent from or unlikely to occur within the APE due to past or ongoing disturbance and/or the absence of suitable habitat.

Since it is unlikely that these species would occur onsite, implementation of the project should have no impact on these 12 special status species through construction mortality, disturbance, or loss of habitat. Mitigation measures are not warranted.

3.5.2 PROJECT-RELATED IMPACTS TO SPECIAL STATUS ANIMAL SPECIES ABSENT FROM, OR UNLIKELY TO OCCUR ON, THE APE

Of the 21 regionally occurring special status animal species, 17 are considered absent from or unlikely to occur within the APE due to past or ongoing disturbance and/or the absence of suitable habitat. These species include: American badger, blunt-nosed leopard lizard, California glossy snake, California tiger salamander, Crotch's bumble bee, Fresno kangaroo rat, least Bell's vireo, monarch butterfly, northern California legless lizard, pallid bat, San Joaquin kit fox, tricolored blackbird, valley elderberry longhorn beetle, vernal pool fairy shrimp, western mastiff bat, western spadefoot, and western yellow-billed cuckoo.

Since it is unlikely that these species would occur onsite, implementation of the project should have no impact on these 17 special status species through construction mortality, disturbance, or loss of habitat. Mitigation measures are not warranted.

3.5.3 PROJECT-RELATED IMPACTS TO RIPARIAN HABITAT AND NATURAL COMMUNITIES OF SPECIAL CONCERN

Riparian habitat is absent from the APE and adjacent lands. There are no CNDDB-designated "natural communities of special concern" recorded within the APE or surrounding lands. Mitigation is not warranted.

3.5.4 PROJECT-RELATED IMPACTS TO REGULATED WATERS, WETLANDS, AND WATER QUALITY

Typical wetlands, vernal pools, and other waters were absent from the APE. There are no designated wild and scenic rivers within the APE; therefore, the project would not result in direct impacts to wild and scenic rivers. Mitigation measures are not warranted.

Since construction would involve ground disturbance over an area greater than one acre, the project would also be required to obtain a Construction Stormwater General Permit under the Storm Water Program administered by the RWQCB. A prerequisite for this permit is the development of a SWPPP so activities do not adversely affect water quality.

3.5.5 PROJECT-RELATED IMPACTS TO CRITICAL HABITAT

Designated critical habitat is absent from the APE and surrounding lands. Therefore, there would be no impact to critical habitat, and mitigation measures are not warranted.

3.5.6 LOCAL POLICIES OR HABITAT CONSERVATION PLANS

The project appears to be consistent with the goals and policies of the Fresno County General Plan. There are no known HCPs or NCCPs in the project vicinity. Mitigation measures are not warranted.

3.5.7 COASTAL ZONE AND COASTAL BARRIERS RESOURCES ACT

The project would not be located within the coastal zone. The project would not impact or be located within or near the Coastal Barrier Resources System or its adjacent wetlands, marshes, estuaries, inlets, and near-shore waters. Mitigation measures are not warranted.

3.5.8 PROJECT-RELATED IMPACT TO ESSENTIAL FISH HABITAT

Essential Fish Habitat (EFH) and Habitat Areas of Particular Concern are absent from the APE and surrounding lands, and consultation with the National Marine Fisheries Service (NMFS) would not be required. Query results of the NMFS EHF Mapper can be found in Appendix E at the end of this document. Mitigation measures are not warranted.

4 REFERENCES

Calflora. 2024. Accessed 2025 January. http://www.calflora.org/.

California Department of Fish and Wildlife. 2024a. *California Natural Diversity Database- RareFind.* Accessed January 2025.

—. 2018. "Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensative Natural Communities." March. Accessed January 2025. https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18959&inline.

California Department of Fish and Wildlife. 2024b. "State and federally listed endangered, threatened, and rare plants of California." Accessed January 2025. https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=109390&inline.

Cornell Lab of Ornithology. 2024. *eBird.* Accessed January 2025. https://ebird.org/.

Department of Water Resources. 2019. *Groundwater Basin Boundary Assessment Tool.* Accessed January 2025. https://gis.water.ca.gov/app/bbat/.

iNaturalist. 2025. *Observations of Special Status Species.* Accessed January 2025. https://www.inaturalist.org/.

State of California Natural Resources Agency Department of Fish and Game. 2012. "Staff Report on Burrowing Owl Mitigation." Accessed January 2025.

State Water Resources Control Board. 2021. "State Wetland Definition and Procedures for Discharge of Dredged or Fill Material to Waters of the State." Accessed January 2025.

Swainson's Hawk Technical Advisory Committee. 2000. "Recommended Timing and Methodology for Swainson's Hawk Nesting Surveys in California's Central Valley." May. Accessed January 2025.

The California Burrowing Owl Consortium. 1993. "Burrowing Owl Survey Protocol and Mitigation Guidelines." Accessed January 2025.

The National Oceanic and Atmospheric Administration. 2025. *AgACIS Climate Data Retrieval.* https://agacis.rcc-acis.org/.

—. 2024. *Essential Fish Habitat Mapper.* Accessed January 2025. https://www.habitat.noaa.gov/apps/efhmapper/?page=page_5.

United States Army Corps of Engineers. 1987. "Corps of Engineers Wetlands Delineation Manual." Accessed January 2025.

United States Department of Agriculture Natural Resource Conservation Service. 2025. *Soil Survey Area.* Accessed January 2025. https://www.nrcs.usda.gov/publications/Lists%20of%20Hydric%20Soils%20-%20Query%20by%20Soil%20Survey%20Area%20Map%20Unit%20Rating.html.

United States Environmental Protection Agency. 2024a. *Waters GeoViewer.* Accessed January 2025. https://www.epa.gov/waterdata/waters-geoviewer.

United States Fish and Wildlife Service. 2024b. *Information on Planning and Consultation.* Accessed January 2025. https://ecos.fws.gov/ipac/.

—. 2024c. *National Wetlands Inventory.* Accessed January 2025. https://www.fws.gov/wetlands/data/mapper.html.

—. 1998. "Recovery Plan for Upland Species of the San Joaquin Valley, California." Accessed January 2025.

United States Fish and Wildlife Service. 2024d. *Environmental Conservation Online System.* Accessed January 2025. https://ecos.fws.gov/ecp/.

United States Geological Survey. 2006. *United States Geological Survey Western Pond Turtle (Emys marmorata) Visual Survey Protocol for the Southcoast Ecoregion.* Accessed January 2025. https://sdmmp.com/upload/SDMMP_Repository/0/4fnpv18xm0sqtw29j7d3rz56bkychg.pdf.

University of California, Berkeley. 2024. *The Jepson Herbarium.* Accessed January 2025. http://ucjeps.berkeley.edu/eflora/.

APPENDIX A: REPRESENTATIVE PHOTOS OF THE APE



Photograph 1

Overview of the pastureland habitat in the southeast section of the APE and adjacent to the mobile home park (MHP).



Photograph 2

Overview of the ruderal and residential habitat at the MHP.



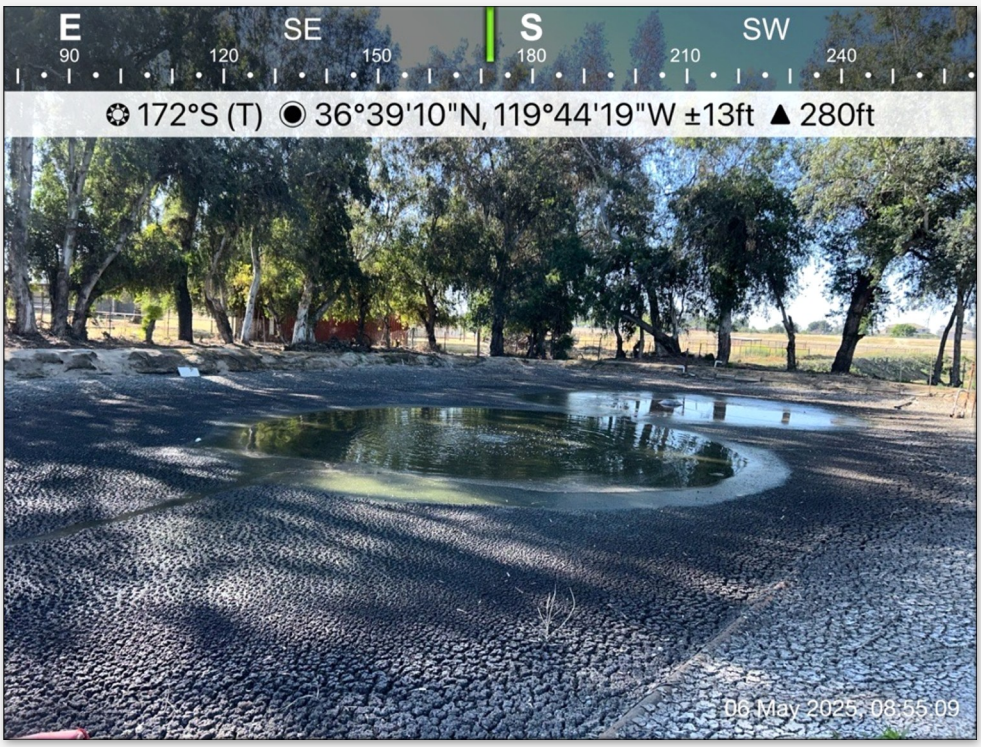
Photograph 3

The wastewater treatment system at the MHP.



Photograph 4

Snake carcass found within the ruderal habitat at the MHP. Identified as most likely a gopher snake.



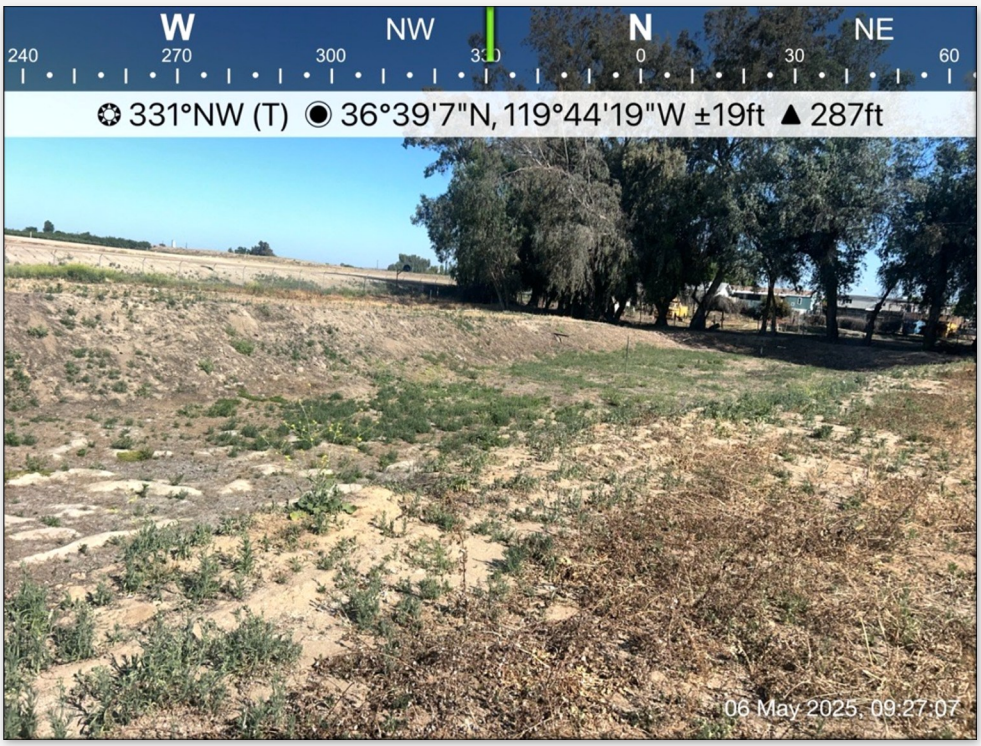
Photograph 5

The treatment pond directly south of the MHP and within the APE.



Photograph 6

The treatment pond south-west of the MHP and within the APE.



Photograph 7

Dry treatment pond south-east of the MHP and within the APE.



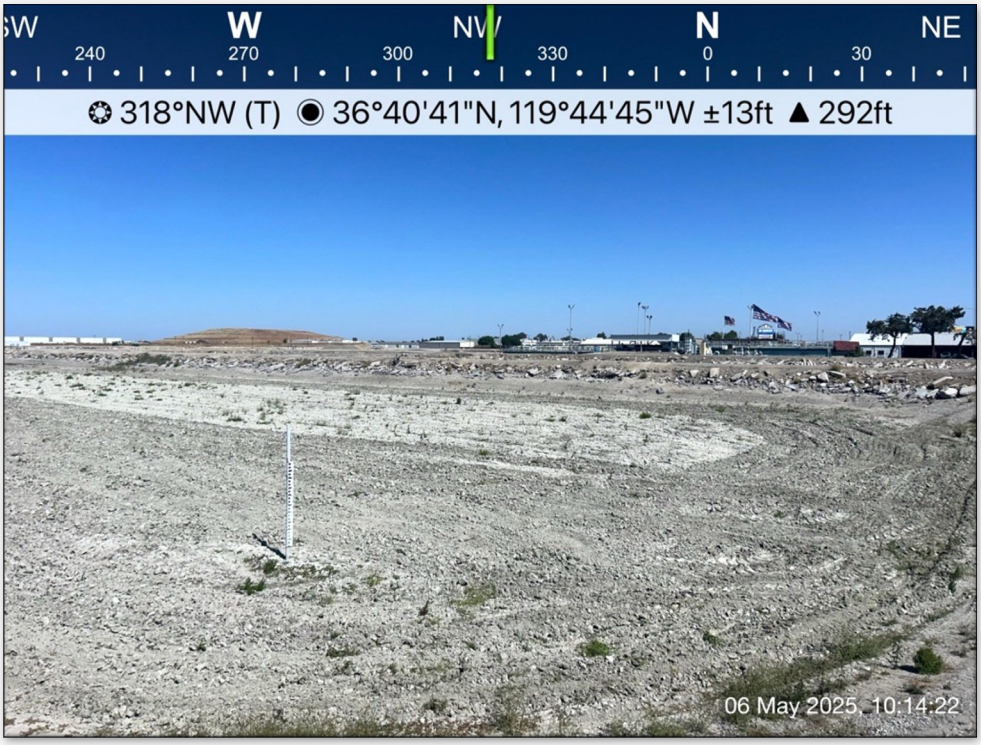
Photograph 8

Red-eared sliders observed at the treatment pond directly south of the MHP.



Photograph 9

Defuncted horse stable facilities adjacent to the MHP and in the southeast portion of the APE.



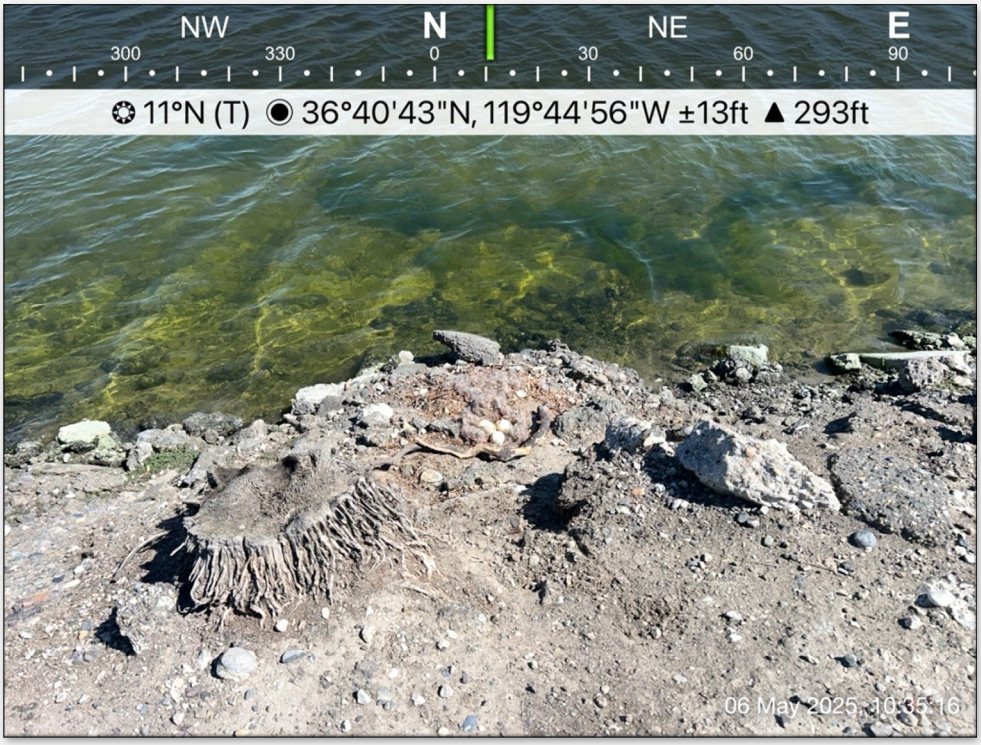
Photograph 10

Overview of the treatment ponds (only one active) at the wastewater treatment facility (WWTF) from the southeast corner.



Photograph 11

The singular active treatment pond located near the southeastern corner of the WWTF.



Photograph 12

An unattended goose nest along the bank of the active treatment pond.



Photograph 13

The ruderal habitat at the WWTF, which includes treatment equipment and buildings.



Photograph 14

One of the multiple fallow fields adjacent to the proposed pipeline.



Photograph 15

Cropland and ruderal habitat adjacent to the proposed pipeline.



Photograph 16

The abandoned enclosed horse pastures within the pastureland habitat of the APE.

APPENDIX B: CNDDB 9-QUAD SPECIES LIST

Selected Elements by Common Name

California Department of Fish and Wildlife

California Natural Diversity Database

Query Criteria: Quad IS (Malaga (3611966) OR Fresno North (3611977) OR Clovis (3611976) OR Round Mountain (3611975) OR Fresno South (3611967) OR Sanger (3611965) OR Caruthers (3611957) OR Conejo (3611956) OR Selma (3611955))

Species	Element Code	Federal Status	State Status	Global Rank	State Rank	Rare Plant Rank/CDFW SSC or FP
alkali-sink goldfields *Lasthenia chrysantha*	PDAST5L030	None	None	G2	S2	1B.1
American badger *Taxidea taxus*	AMAJF04010	None	None	G5	S3	SSC
American bumble bee *Bombus pensylvanicus*	IIHYM24260	None	None	G3G4	S2	
Antioch efferian robberfly *Efferia antiochi*	IIDIP07010	None	None	G1G2	S1S2	
black-crowned night heron *Nycticorax nycticorax*	ABNGA11010	None	None	G5	S4	
bristly sedge *Carex comosa*	PMCYP032Y0	None	None	G5	S2	2B.1
burrowing owl *Athene cunicularia*	ABNSB10010	None	Candidate Endangered	G4	S2	SSC
California glossy snake *Arizona elegans occidentalis*	ARADB01017	None	None	G5T2	S2	SSC
California jewelflower *Caulanthus californicus*	PDBRA31010	Endangered	Endangered	G1	S1	1B.1
California linderiella *Linderiella occidentalis*	ICBRA06010	None	None	G2G3	S2S3	
California satintail *Imperata brevifolia*	PMPOA3D020	None	None	G3	S3	2B.1
California tiger salamander - central California DPS *Ambystoma californiense pop. 1*	AAAAA01181	Threatened	Threatened	G2G3T3	S3	WL
coast horned lizard *Phrynosoma blainvillii*	ARACF12100	None	None	G4	S4	SSC
Crotch's bumble bee *Bombus crotchii*	IIHYM24480	None	Candidate Endangered	G2	S2	
double-crested cormorant *Nannopterum auritum*	ABNFD01020	None	None	G5	S4	WL
forked hare-leaf *Lagophylla dichotoma*	PDAST5J070	None	None	G2	S2	1B.1
Fresno kangaroo rat *Dipodomys nitratoides exilis*	AMAFD03151	Endangered	Endangered	G2TH	SH	
great egret *Ardea alba*	ABNGA04040	None	None	G5	S4	

Species	Element Code	Federal Status	State Status	Global Rank	State Rank	Rare Plant Rank/CDFW SSC or FP
Greene's tuctoria *Tuctoria greenei*	PMPOA6N010	Endangered	Rare	G1	S1	1B.1
hoary bat *Lasiurus cinereus*	AMACC05032	None	None	G3G4	S4	
Hurd's metapogon robberfly *Metapogon hurdi*	IIDIP08010	None	None	G1G2	S1S2	
least Bell's vireo *Vireo bellii pusillus*	ABPBW01114	Endangered	Endangered	G5T2	S3	
Madera leptosiphon *Leptosiphon serrulatus*	PDPLM09130	None	None	G3	S3	1B.2
midvalley fairy shrimp *Branchinecta mesovallensis*	ICBRA03150	None	None	G2	S2S3	
molestan blister beetle *Lytta molesta*	IICOL4C030	None	None	G2	S2	
Northern California legless lizard *Anniella pulchra*	ARACC01020	None	None	G3	S2S3	SSC
Northern Claypan Vernal Pool *Northern Claypan Vernal Pool*	CTT44120CA	None	None	G1	S1.1	
Northern Hardpan Vernal Pool *Northern Hardpan Vernal Pool*	CTT44110CA	None	None	G3	S3.1	
northwestern pond turtle *Actinemys marmorata*	ARAAD02031	Proposed Threatened	None	G2	SNR	SSC
pallid bat *Antrozous pallidus*	AMACC10010	None	None	G4	S3	SSC
San Joaquin adobe sunburst *Pseudobahia peirsonii*	PDAST7P030	Threatened	Endangered	G1	S1	1B.1
San Joaquin kit fox *Vulpes macrotis mutica*	AMAJA03041	Endangered	Threatened	G4T2	S3	
San Joaquin pocket mouse *Perognathus inornatus*	AMAFD01060	None	None	G3	S2S3	
San Joaquin Valley Orcutt grass *Orcuttia inaequalis*	PMPOA4G060	Threatened	Endangered	G1	S1	1B.1
Sanford's arrowhead *Sagittaria sanfordii*	PMALI040Q0	None	None	G3	S3	1B.2
snowy egret *Egretta thula*	ABNGA06030	None	None	G5	S4	
spiny-sepaled button-celery *Eryngium spinosepalum*	PDAPI0Z0Y0	None	None	G2	S2	1B.2
succulent owl's-clover *Castilleja campestris var. succulenta*	PDSCR0D3Z1	Threatened	Endangered	G4?T2T3	S2S3	1B.2
Swainson's hawk *Buteo swainsoni*	ABNKC19070	None	Threatened	G5	S4	

Species	Element Code	Federal Status	State Status	Global Rank	State Rank	Rare Plant Rank/CDFW SSC or FP
tricolored blackbird *Agelaius tricolor*	ABPBXB0020	None	Threatened	G1G2	S2	SSC
valley elderberry longhorn beetle *Desmocerus californicus dimorphus*	IICOL48011	Threatened	None	G3T3	S3	
vernal pool fairy shrimp *Branchinecta lynchi*	ICBRA03030	Threatened	None	G3	S3	
western mastiff bat *Eumops perotis californicus*	AMACD02011	None	None	G4G5T4	S3S4	SSC
western spadefoot *Spea hammondii*	AAABF02020	Proposed Threatened	None	G2G3	S3S4	SSC
western yellow-billed cuckoo *Coccyzus americanus occidentalis*	ABNRB02022	Threatened	Endangered	G5T2T3	S1	

Record Count: 45

APPENDIX C: IPAC SPECIES LIST

United States Department of the Interior

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

In Reply Refer To: 04/14/2025 16:10:21 UTC
Project Code: 2025-0082856
Project Name: Comunidad Nuevo Lago MHP Sewer Consolidation Project

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

To Whom It May Concern:

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

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

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

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

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

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

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

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

The MBTA has no provision for allowing take of migratory birds that may be unintentionally killed or injured by otherwise lawful activities. It is the responsibility of the project proponent to comply with these Acts by identifying potential impacts to migratory birds and eagles within applicable NEPA documents (when there is a federal nexus) or a Bird/Eagle Conservation Plan (when there is no federal nexus). Proponents should implement conservation measures to avoid or minimize the production of project-related stressors or minimize the exposure of birds and their resources to the project-related stressors. For more information on avian stressors and recommended conservation measures, see https://www.fws.gov/library/collections/threats-birds.

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

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

Attachment(s):

- Official Species List

OFFICIAL SPECIES LIST

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

This species list is provided by:

Sacramento Fish And Wildlife Office
Federal Building
2800 Cottage Way, Room W-2605
Sacramento, CA 95825-1846
(916) 414-6600

PROJECT SUMMARY

Project Code: 2025-0082856
Project Name: Malaga – Shady Lakes MHP Sewer Consolidation Project
Project Type: Wastewater Pipeline - New Constr - Below Ground
Project Description: It is understood that the existing sewer system for the Shady Lakes Mobile Home Park (MHP) serves 65 connections approximately one mile south of Malaga County Water District. wastewater treatment facility (WWTF) is in poor condition, and the infrastructure is in need of upgrade. The MHP struggles with overflow, leaking, and odors, and the WWTF does not meet their current Waste Discharge Requirements (Order No. 75-079) defined by the Regional Water Quality Control Board (RWQCB). There is not sufficient space within the MHP property to make the required upgrades, and the MHP meets the requirements under SB 1215 for a sewer consolidation with Malaga County Water District (District).

Project Location:

The approximate location of the project can be viewed in Google Maps: https://www.google.com/maps/@36.67072095,-119.745719597239,14z



Counties: Fresno County, California

ENDANGERED SPECIES ACT SPECIES

There is a total of 9 threatened, endangered, or candidate species on this species list.

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

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries[1], as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

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

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

MAMMALS

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

BIRDS

NAME	STATUS
Yellow-billed Cuckoo *Coccyzus americanus* Population: Western U.S. DPS There is **final** critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/3911	Threatened

REPTILES

NAME	STATUS
Blunt-nosed Leopard Lizard *Gambelia silus* No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/625	Endangered
Northwestern Pond Turtle *Actinemys marmorata* No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/1111	Proposed Threatened

AMPHIBIANS

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

INSECTS

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

CRUSTACEANS

NAME	STATUS
Vernal Pool Fairy Shrimp *Branchinecta lynchi*	Threatened

There is **final** critical habitat for this species. Your location does not overlap the critical habitat.
Species profile: https://ecos.fws.gov/ecp/species/498

CRITICAL HABITATS

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

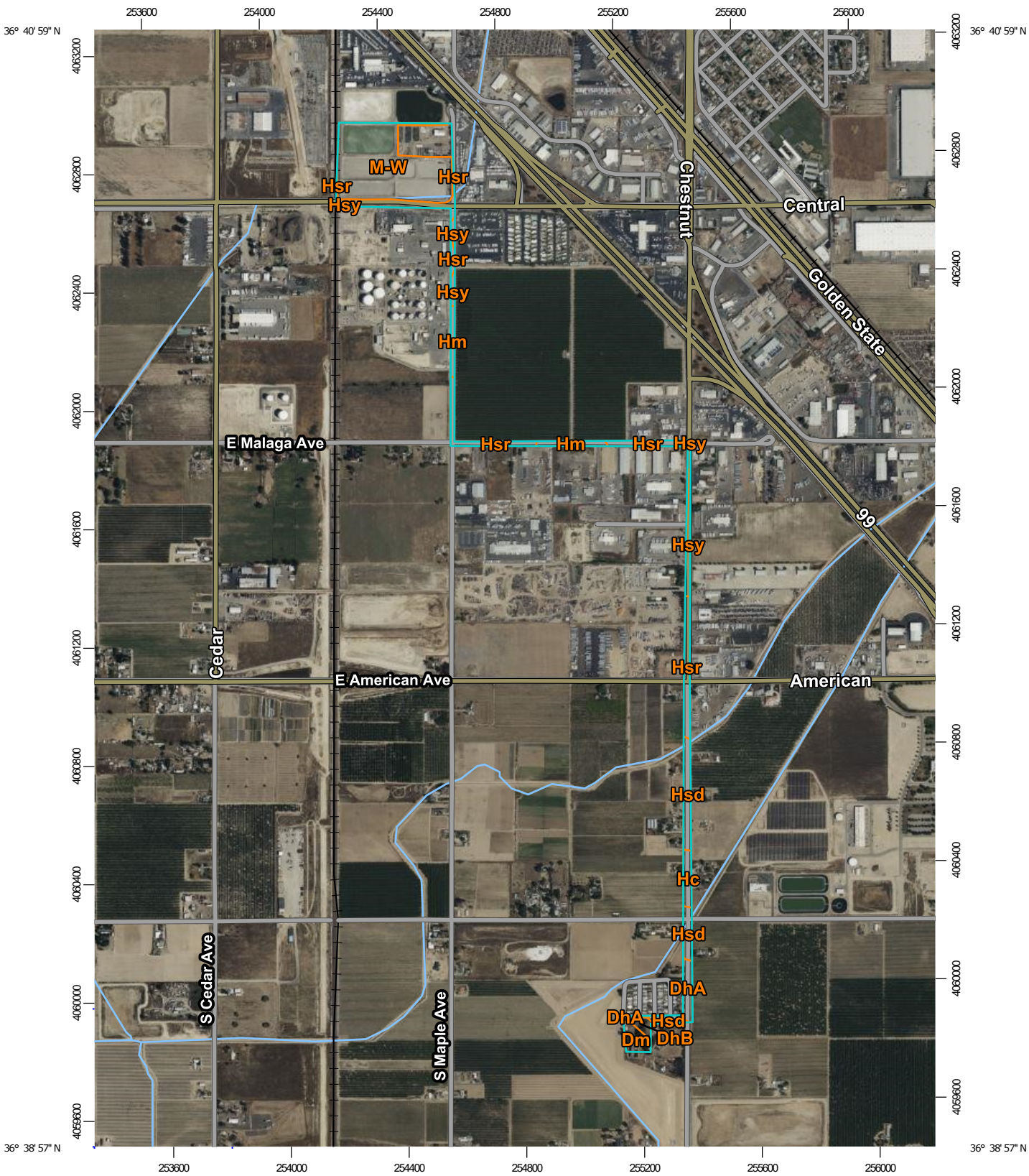
YOU ARE STILL REQUIRED TO DETERMINE IF YOUR PROJECT(S) MAY HAVE EFFECTS ON ALL ABOVE LISTED SPECIES.

IPAC USER CONTACT INFORMATION

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

APPENDIX D: NRCS WEB SOIL SURVEY REPORT

Soil Map—Eastern Fresno Area, California
(Comunidad Nuevo Lago Mobile Home Park Sewer Consolidation Project)



Map Scale: 1:18,400 if printed on A portrait (8.5" x 11") sheet.

N

Meters: 0 250 500 1000 1500

Feet: 0 500 1000 2000 3000

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

MAP LEGEND

Area of Interest (AOI)
- Area of Interest (AOI)

Soils
- Soil Map Unit Polygons
- Soil Map Unit Lines
- Soil Map Unit Points

Special Point Features
- Blowout
- Borrow Pit
- Clay Spot
- Closed Depression
- Gravel Pit
- Gravelly Spot
- Landfill
- Lava Flow
- Marsh or swamp
- Mine or Quarry
- Miscellaneous Water
- Perennial Water
- Rock Outcrop
- Saline Spot
- Sandy Spot
- Severely Eroded Spot
- Sinkhole
- Slide or Slip
- Sodic Spot
- Spoil Area
- Stony Spot
- Very Stony Spot
- Wet Spot
- Other
- Special Line Features

Water Features
- Streams and Canals

Transportation
- Rails
- Interstate Highways
- US Routes
- Major Roads
- Local Roads

Background
- Aerial Photography

MAP INFORMATION

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

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

Source of Map: Natural Resources Conservation Service
Web Soil Survey URL:
Coordinate System: Web Mercator (EPSG:3857)

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

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

Soil Survey Area: Eastern Fresno Area, California
Survey Area Data: Version 17, Aug 30, 2024

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

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

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

Map Unit Legend

Map Unit Symbol	Map Unit Name	Acres in AOI	Percent of AOI
DhA	Delhi loamy sand, 0 to 3 percent slopes, MLRA 17	1.7	3.5%
DhB	Delhi loamy sand, 3 to 9 percent slopes	1.0	2.0%
Dm	Dello loamy sand	1.7	3.5%
Hc	Hanford sandy loam	1.3	2.7%
Hm	Hanford fine sandy loam	1.8	3.8%
Hsd	Hesperia sandy loam, very deep	4.4	9.1%
Hsr	Hesperia fine sandy loam, very deep	13.3	27.6%
Hsy	Hesperia fine sandy loam, deep, saline-sodic	2.5	5.2%
M-W	Miscellaneous water	20.4	42.5%
Totals for Area of Interest		**47.9**	**100.0%**

APPENDIX E: NMFS EFH MAPPER

EFH Mapper Report

EFH Data Notice

Essential Fish Habitat (EFH) is defined by textual descriptions contained in the fishery management plans developed by the regional fishery management councils. In most cases mapping data can not fully represent the complexity of the habitats that make up EFH. This report should be used for general interest queries only and should not be interpreted as a definitive evaluation of EFH at this location. A location-specific evaluation of EFH for any official purposes must be performed by a regional expert. Please refer to the following links for the appropriate regional resources.

West Coast Regional Office

Query Results

Degrees, Minutes, Seconds: Latitude = 36º 40' 3" N, Longitude = 120º 15' 15" W
Decimal Degrees: Latitude = 36.668, Longitude = -119.746

The query location intersects with spatial data representing EFH and/or HAPCs for the following species/management units.

EFH

No additional Essential Fish Habitats (EFH) were identified at the report location.

Pacific Salmon EFH

No Pacific Salmon Essential Fish Habitat (EFH) were identified at the report location.

Atlantic Salmon

No Atlantic Salmon were identified at the report location.

HAPCs

No Habitat Areas of Particular Concern (HAPC) were identified at the report location.

EFH Areas Protected from Fishing

No EFH Areas Protected from Fishing (EFHA) were identified at the report location.

Spatial data does not currently exist for all the managed species in this area. The following is a list of species or management units for which there is no spatial data.
****For links to all EFH text descriptions see the complete data inventory: open data inventory -->**

Pacific Coastal Pelagic Species,
Jack Mackerel,
Pacific (Chub) Mackerel,
Pacific Sardine,
Northern Anchovy - Central Subpopulation,
Northern Anchovy - Northern Subpopulation,
Pacific Highly Migratory Species,
Bigeye Thresher Shark - North Pacific,
Bluefin Tuna - Pacific,
Dolphinfish (Dorado or Mahimahi) - Pacific,

Spatial data does not currently exist for all the managed species in this area. The following is a list of species or management units for which there is no spatial data. ****For links to all EFH text descriptions see the complete data inventory: open data inventory -->**
Pelagic Thresher Shark - North Pacific, Swordfish - North Pacific

Appendix C: Phase I Cultural Resources Assessment