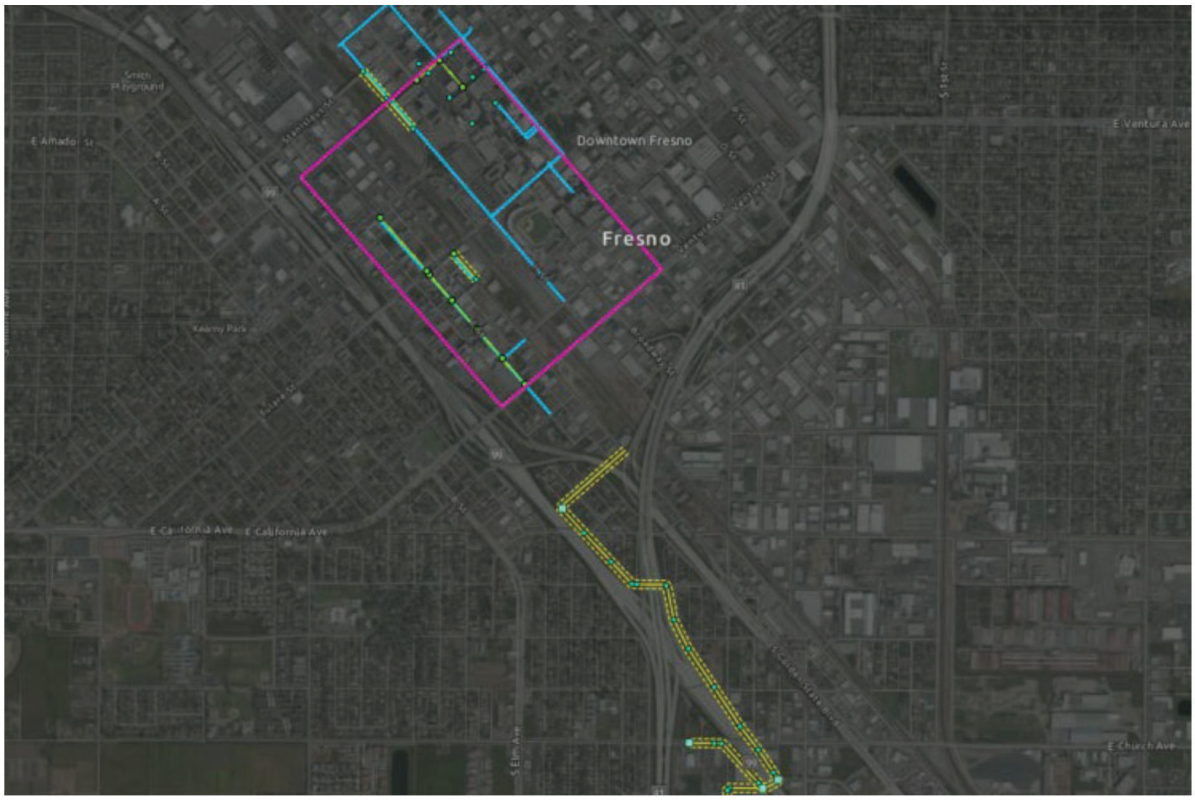


IIGC Downtown Water and Sewer Improvements Project

Initial Study – Mitigated Negative Declaration

prepared by

City of Fresno
Capital Projects Department
747 R Street, 2nd Floor
Fresno, California 93721
Contact: Robert Diaz, Project Manager

prepared with the assistance of

Rincon Consultants, Inc.
4589 North Marty Avenue, Suite 102
Fresno, California 93722

October 2025

RINCON CONSULTANTS

Table of Contents

Initial Study 1
1. Project Title 1
2. Lead Agency/Project Sponsor Name and Address 1
3. Contact Person and Contact Information 1
4. Project Location 1
5. General Plan Land Use Designation and Zoning 1
6. Project Characteristics 8
7. Other Public Agencies Whose Approval is Required 14
8. Native American Consultation 14
Environmental Factors Potentially Affected 17
Determination 17
Environmental Checklist 19
1 Aesthetics 19
2 Agriculture and Forestry Resources 21
3 Air Quality 23
4 Biological Resources 31
5 Cultural Resources 35
6 Energy 49
7 Geology and Soils 51
8 Greenhouse Gas Emissions 55
9 Hazards and Hazardous Materials 63
10 Hydrology and Water Quality 71
11 Land Use and Planning 75
12 Mineral Resources 77
13 Noise 79
14 Population and Housing 87
15 Public Services 89
16 Recreation 93
17 Transportation 95
18 Tribal Cultural Resources 97
19 Utilities and Service Systems 101
20 Wildfire 105
21 Mandatory Findings of Significance 107
References 115
Bibliography 115
List of Preparers 117

Tables

Table 1 Health Effects Associated with Non-Attainment Criteria Pollutants 24
Table 2 SJVAPCD Thresholds of Significance 26
Table 3 Annual Construction Emissions 27
Table 4 Cultural Resources Potentially Impacted by the Project 39
Table 5 Combined Annual Emissions of Greenhouse Gases 60
Table 6 General Plan Consistency 76
Table 7 Project Site Noise Monitoring Results – Short Term 82
Table 8 Transportation (Non-Aircraft) Noise Sources 82
Table 9 Stationary Noise Sources 83
Table 10 Construction Noise Levels 84
Table 11 Construction Vibration Levels 85

Figures

Figure 1 Regional Location 2
Figure 2 Project Site Location 3
Figure 3 Project Site General Plan Land Use Designation – Northern Alignment 4
Figure 4 Project Site General Plan Land Use Designation – Southern Alignment 5
Figure 5 Project Site Zoning Designation - Northern Alignment 6
Figure 6 Project Site Zoning Designation - Southern Alignment 7
Figure 7 Approximate Noise Measurement Locations 81

Appendices

Appendix A CalEEMod Outputs
Appendix B Biological Resources Technical Memorandum
Appendix C Cultural Resources Technical Memorandum
Appendix D Noise Inputs and Outputs

Initial Study

1. Project Title

IIGC Downtown Water and Sewer Improvements Project

2. Lead Agency/Project Sponsor Name and Address

City of Fresno –Capital Projects Department
747 R Street Fresno, California 93721

3. Contact Person and Contact Information

Robert Diaz, Project Manager
Email: robert.diaz@fresno.gov
Phone: (559) 621-8837

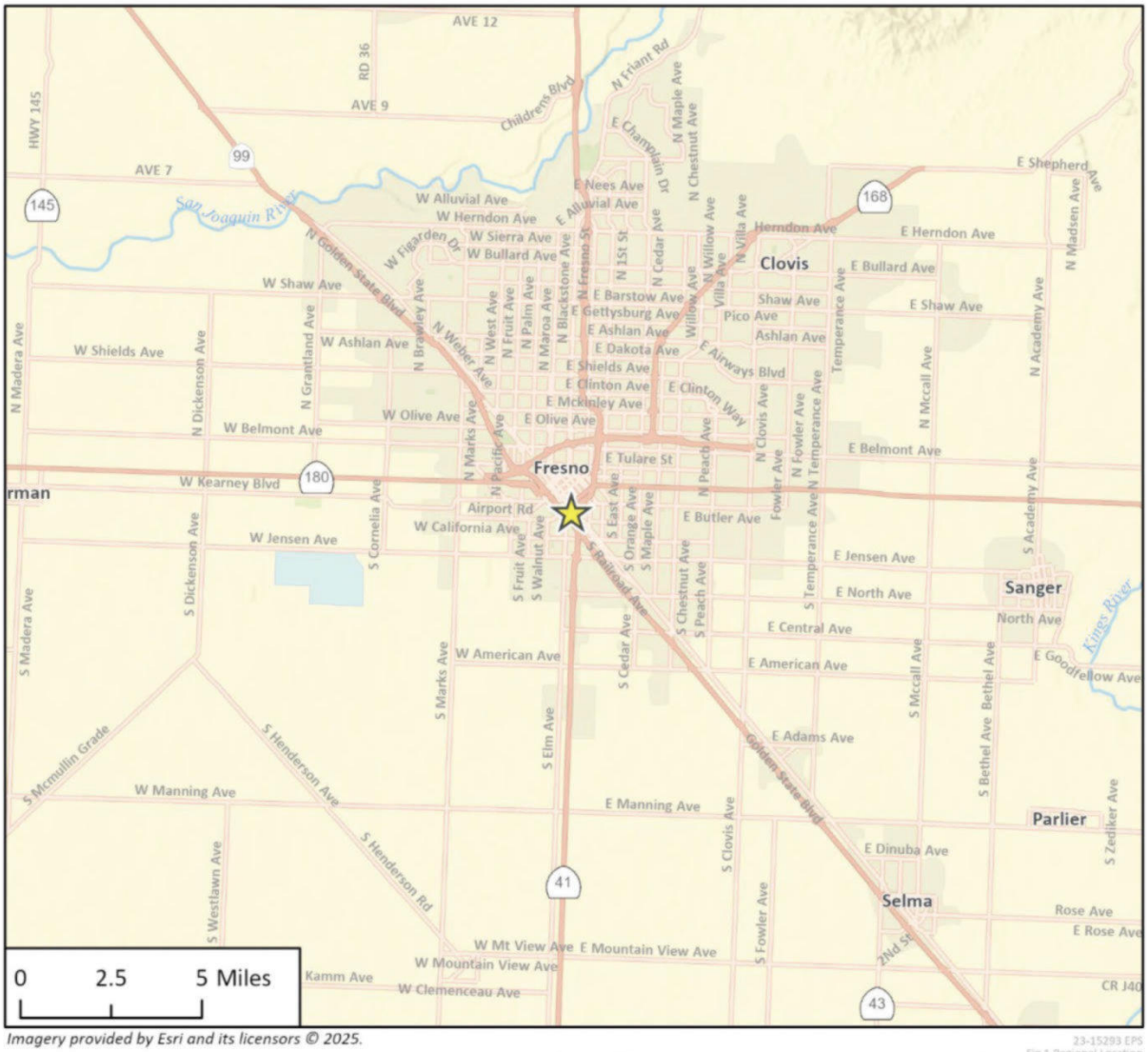
4. Project Location

The project site is located in Downtown Fresno. Project activities would generally occur within the boundaries of Calaveras Street to the northwest, Van Ness Avenue to the east, Grove Street to the southeast, and State Route (SR) 99 to the west. The site is in an urban area, has been previously graded and developed, and is located within the public roadway rights-of-way. Figure 1 shows the regional location of the project site and Figure 2 shows the location of the site in its neighborhood context.

5. General Plan Land Use Designation and Zoning

The proposed project components traverse numerous parcels with different general plan land use designations and zoning designations. The General Plan land use designations are shown in Figure 3 and Figure 4. The zoning designations are shown in Figure 5 and Figure 6.

Figure 1 Regional Location



Imagery provided by Esri and its licensors © 2025.

23-15293 EPS
Fig 1 Regional Location

★ Project Location

N

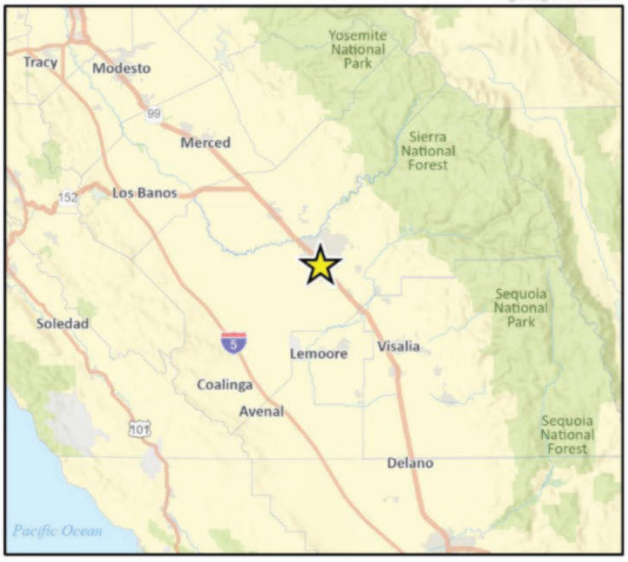
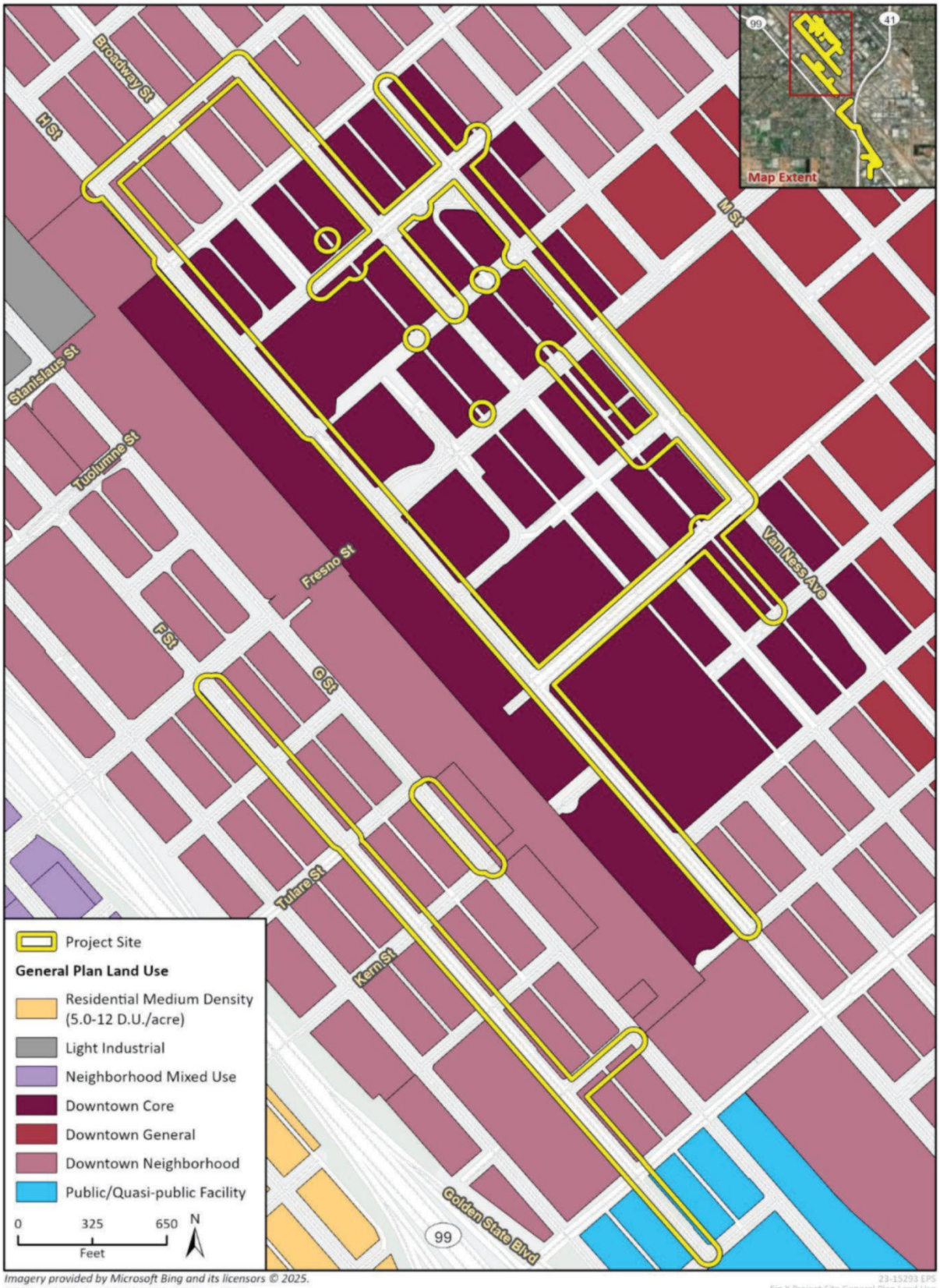


Figure 2 Project Site Location



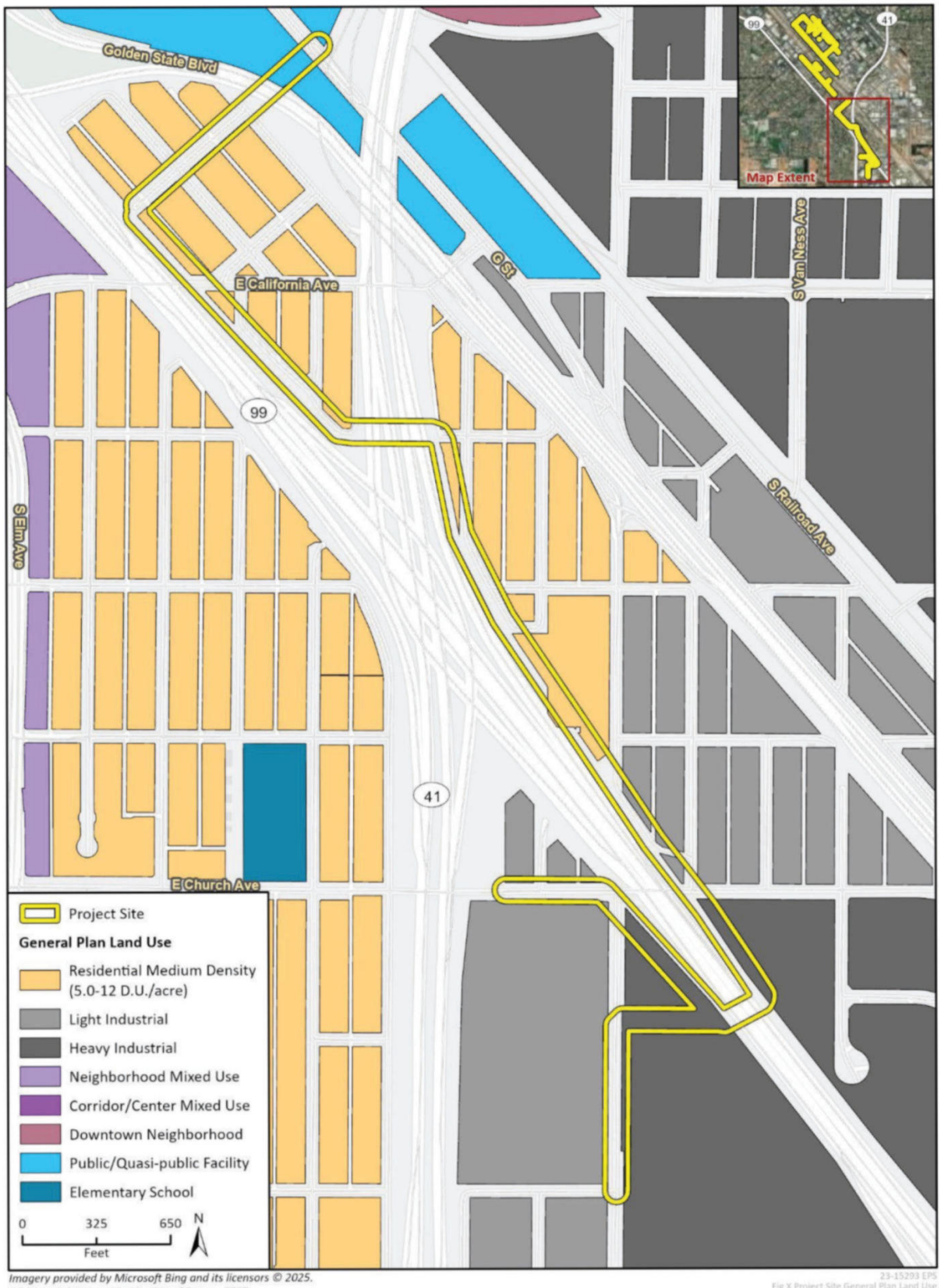
Figure 3 Project Site General Plan Land Use Designation – Northern Alignment



Imagery provided by Microsoft Bing and its licensors © 2025.
Additional data provided by City of Fresno, 2025.

23-15293 EPS
Fig X Project Site General Plan Land Use

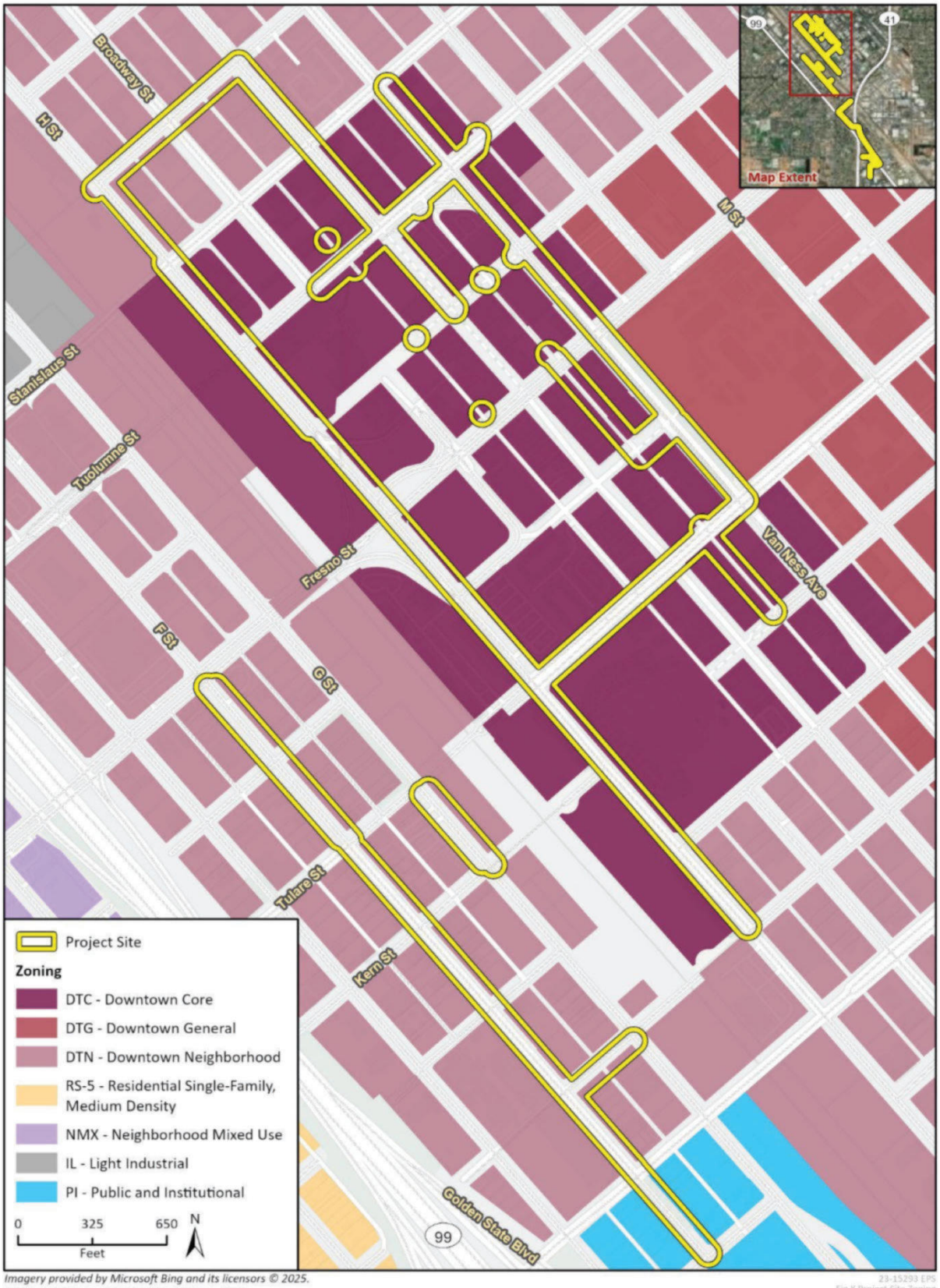
Figure 4 Project Site General Plan Land Use Designation – Southern Alignment



Imagery provided by Microsoft Bing and its licensors © 2025.
Additional data provided by City of Fresno, 2025.

23-15293 EPS
Fig X Project Site General Plan Land Use

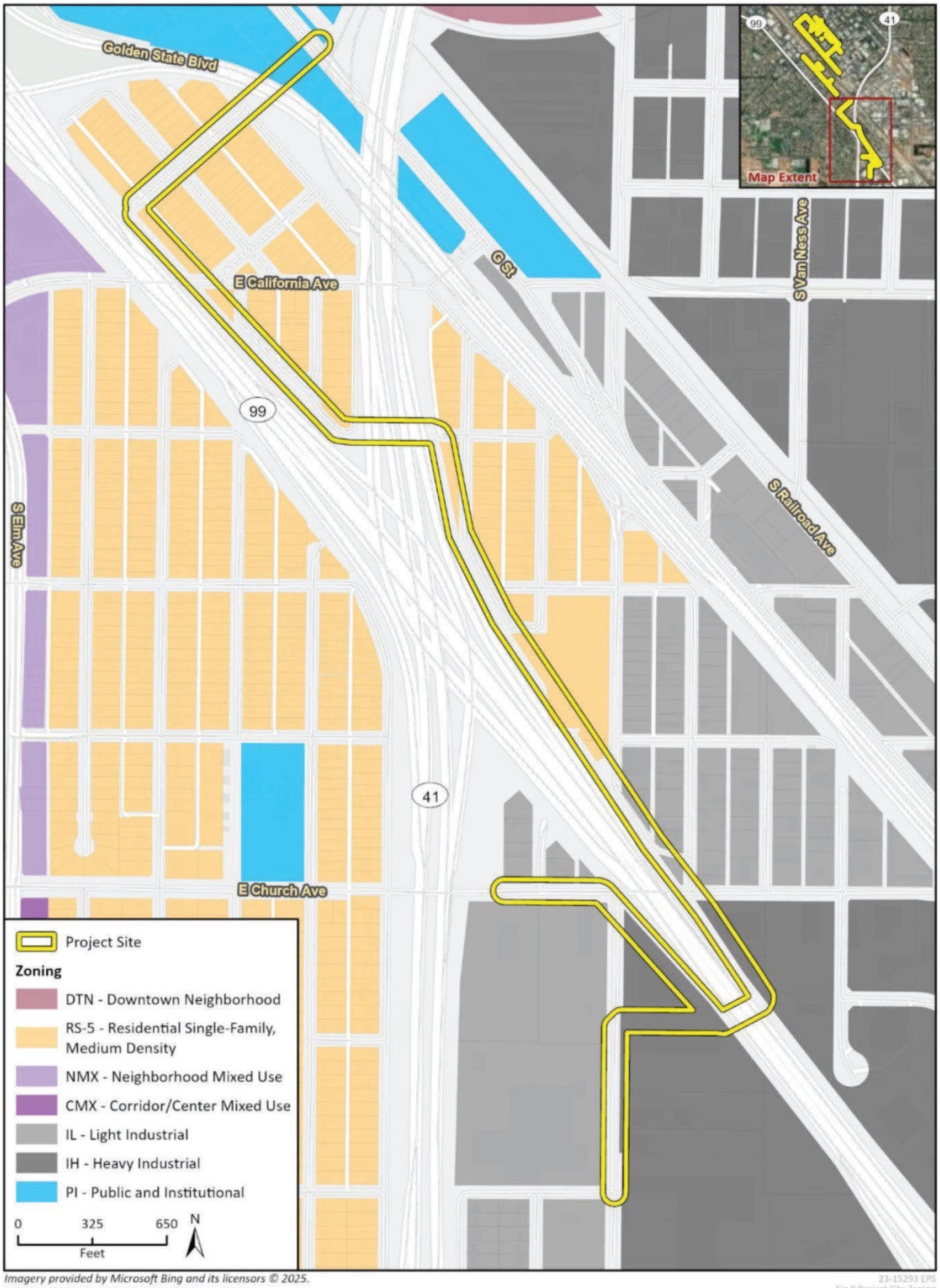
Figure 5 Project Site Zoning Designation - Northern Alignment



Imagery provided by Microsoft Bing and its licensors © 2025.
Additional data provided by City of Fresno, 2025.

23-15293 EPS
Fig X Project Site Zoning

Figure 6 Project Site Zoning Designation - Southern Alignment



Imagery provided by Microsoft Bing and its licensors © 2025.
Additional data provided by City of Fresno, 2025.

23-15293 EPS
Fig X Project Site Zoning

6. Project Characteristics

The City of Fresno (City) has secured funding through the California Housing and Community Development Infill Infrastructure Grant Catalytic Qualifying Infill Area Program (IIGC Grant). The primary use of the IIGC Grant funds are intended to fund at least seven projects related to upgrading water and sewer infrastructure within the Downtown Fresno triangle. The objective of the IIGC grant funding is to support infill development by providing financial assistance for capital improvement projects that are essential to, or directly support, the development of affordable and mixed-income housing. Numerous long-range plans have been adopted by the City to support this planned increase in housing, including the Fresno Multi-Jurisdictional 2023-2031 Housing Element, Downtown Neighborhoods Community Plan, Fulton Corridor Specific Plan, and Downtown Development Code (Fresno Council of Governments [FCOG] 2024; Fresno 2016a; Fresno 2016b; Fresno 2011). The planned increase in affordable and mixed-income housing was previously environmental assessed through the environmental documentation for these adopted long-range plans.

The proposed project includes approximately 15,900 linear feet of waterline improvements and 13,400 linear feet of sewer pipeline installation and rehabilitation. Project activities would include the installation and rehabilitation of water and sewer pipelines, manholes, and junction structures to support future development in Downtown Fresno. Where applicable, asphalt would be demolished to allow for installation of new pipeline improvements. Rehabilitation activities would not require demolition.

Project Components

The proposed project is comprised of eight components including the Tuolumne/Fulton Street sewer upsizing, H Street sewer rehabilitation, G Street sewer rehabilitation, F Street new sewer pipeline, Monterey Street/SR-99/South Cherry Avenue/East Church Avenue sewer rehabilitation, Downtown water transmission main, G Street water replacement, and F Street new water pipeline. The existing and proposed conditions for each project component are described in detail below.

Tuolumne/Fulton Street Sewer Upsizing

EXISTING CONDITIONS

Existing sanitary sewer mains service the existing parcels from the Van Ness – Fulton Street Alley (Federal Alley) and the Broadway – Fulton Street Alley (Congo Alley), however the City of Fresno prefers to serve new developments from main roadways. As part of this project component, the Federal Alley sewer main from Tuolumne Street to Merced Street would be abandoned while the Congo Alley sewer would remain in place to serve the existing IRS Building located at 1354 Broadway Street.

PROPOSED CONDITIONS

This component includes upsizing the sewer main to a 10-inch main and adding a run from Tuolumne Street from Broadway Street to Fulton Street, and continuing south along Fulton Street to Merced Street. Additionally, the 10-inch line would be used to capture future flows from the proposed 710-unit residential development and discharge directly into the existing 30-inch sanitary sewer in Merced Street. The proposed sewer would be approximately 837 feet long and would be

installed per City of Fresno Standard Specifications. The proposed sewer would likely be PVC pipe and is anticipated to be approximately 10 to 15 feet deep. The project component would involve three new concrete manholes.

H Street Sewer Rehabilitation

EXISTING CONDITIONS

The existing 21-inch unlined reinforced concrete sanitary sewer pipe was installed in 1955 and is susceptible to corrosion from raw wastewater and hydrogen sulfide gas. The existing sewer pipeline, along H Street, has already been rehabilitated both upstream and downstream of the proposed project limits.

PROPOSED CONDITIONS

This component includes rehabilitating 965 linear feet of the existing 24-inch unlined reinforced concrete sanitary sewer pipe between Stanislaus Street and Merced Street along H Street and rehabilitating four existing manholes along the alignment. The rehabilitation method will be cured-in-place pipe (CIPP). CIPP rehabilitation consists of forcing a woven felt liner that is impregnated with a resin compound into an existing sewer main with either air or hydraulic pressure and then curing the line with a heat source such as steam. The CIPP process creates a new structurally sound pipe within the existing pipe. Manhole rehabilitation includes restoring corroded concrete sections as necessary and applying an epoxy compound to the manhole walls, flow channels to protect against future corrosion and replacing the existing iron frame and cover.

G Street Sewer Rehabilitation

EXISTING CONDITIONS

The existing sewer was installed in 1962 and consists of unlined reinforced concrete pipe which is susceptible to cracks and breaks.

PROPOSED CONDITIONS

This project includes rehabilitating 438-linear feet of existing 10-inch VCP sanitary sewer main and rehabilitating two of the existing concrete manholes along the alignment. The G Street sewer rehabilitation project component would occur between Tulare Street and Kern Street. This rehabilitation is intended to protect in place the existing sewer to allow for future development along G Street to connect as needed for sanitary sewer service. VCP is not susceptible to corrosion, compared to the unlined reinforced concrete pipe, however, it is a brittle material and is susceptible to cracks and breaks. The goal of the rehabilitation effort is to replace any completely broken segments of pipe and install a CIPP liner to preserve the use of this sanitary sewer line for future service.

F Street New Sewer Pipeline

EXISTING CONDITIONS

The existing parcels on F Street between Fresno Street and Ceasar Chavez Boulevard are served from both Fagan Alley and China Alley. This area bound by G Street to the north and E Street to the south is considered a desirable location for future development. As noted, the City strives to remove

sanitary sewer services from alleys for future development, therefore the purpose of this sewer facility is to allow for connections along F Street for future development.

PROPOSED CONDITIONS

This component includes installation of two new 12-inch sanitary sewer lines, one 838 linear foot line between Fresno Street and Tulare Street, and one 1,840 linear foot line between Ceasar Chavez Boulevard and Tulare Street. The new sewer lines would be installed per City of Fresno Standard Specifications and are anticipated to be PVC pipe. Approximately eight new manholes would be installed as part of this project component. The new sewer is anticipated to be approximately 10 to 12 feet deep. The sewer main between Fresno Street and Tulare Street would drain to the existing 12-inch sanitary sewer line in Tulare Street and the sewer main between Tulare Street and Ceasar Chavez Boulevard would drain to the existing 22-inch sewer main in Kern Street.

Monterey Street/SR-99/South Cherry Avenue/East Church Avenue Sewer Rehabilitation

EXISTING CONDITIONS

The existing Monterey Street/SR-99/South Cherry Avenue/East Church Avenue Sewer includes approximately 8,442 linear feet of sanitary sewer. Along this sewer line, four junction structures and 16 manholes exist that offer access and angle points to the existing sewer pipeline alignment. The existing sewer line is the main trunk sewer for approximately half of the Downtown Fresno sewershed. The existing sewer material is an unlined reinforced concrete. Unlined reinforced concrete is susceptible to surface corrosion from hydrogen sulfide gas produced by raw wastewater. CCTV inspection videos show that the sewer has experienced corrosion and needs rehabilitation showing signs of exposed aggregate within the existing concrete. The sewer pipeline has four different cross-sections: 36-inch circular reinforced concrete pipe, a 36” by 72” reinforced concrete box culvert where the facility crosses State Route 99, a 42-inch circular reinforced concrete pipe, and a 34” by 53” elliptical reinforced concrete pipe.

PROPOSED CONDITIONS

This component consists of rehabilitation of approximately 8,442 linear feet of sanitary sewer, four sewer junction structures, and 16 existing manholes. The detailed alignment is from Monterey Street between G Street and SR-99, along the northeast side of SR-99 along South Lotus Avenue, across SR-99 to MH 2956-58 at East Lorena Avenue, heading southeast to MH3057-09 approximately 555 feet southeast of East Church Avenue, across SR-99 to existing junction structure, MH3057-10. The alignment splits to the northwest to Church Avenue and west in Church Avenue and directly west to South Cherry Avenue. Existing conditions and proposed activities for each sewer rehabilitation segment are described in detail below:

MONTEREY STREET TO SOUTH LOTUS AVENUE

- The Monterey Street to South Lotus Avenue segment would rehabilitate approximately 1,179 linear feet of existing 30-inch unlined reinforced concrete pipe installed in 1963 with CIPP technology or approved equal.
- The Monterey Street to South Lotus Avenue segment would rehabilitate existing concrete junction structure at the intersection of Monterey Street and the E Street – SR-99 alley.
- The Monterey Street to South Lotus Avenue segment would rehabilitate two existing concrete manholes.

SOUTH LOTUS AVENUE TO APPROXIMATELY 555 FEET SOUTH OF EAST CHURCH AVENUE AT SR-99

- The South Lotus Avenue to approximately 555 feet south of East Church Avenue at SR-99 segment would rehabilitate approximately 4,418 linear feet of 36-inch unlined reinforced concrete pipe installed between the junction structure at Monterey Street and the junction structure approximately 555 feet south of East Church Avenue at SR-99 with CIPP technology or approved equal.
- The South Lotus Avenue to approximately 555 feet south of East Church Avenue at SR-99 segment would rehabilitate existing concrete junction structure approximately 555 linear feet southwest of East Church Avenue (3057-09).
- The South Lotus Avenue to approximately 555 feet south of East Church Avenue at SR-99 segment would rehabilitate 11 existing concrete manholes.

ACROSS SR-99 TO JUNCTION STRUCTURE MH3057-10

- The across SR-99 to Junction Structure MH3057-10 segment would rehabilitate approximately 237 linear feet of existing 36-inch by 72-inch unlined reinforced concrete box culvert installed in 1961 with Spiral Wound PVC (SWPVC) technology or approved equal. SWPVC is a rehabilitation technology that includes a mechanical installation of a PVC liner by using existing access points such as a standard manhole or junction structure. SWPVC provides a full structural rehabilitation of existing conduits.
- The across SR-99 to Junction Structure MH3057-10 segment would rehabilitate the existing concrete junction structure MH3057-07.

JUNCTION STRUCTURE MH3057-10 TO SOUTH CHERRY AVENUE

- The Junction Structure MH3057-10 to South Cherry Avenue segment would rehabilitate 418 linear feet of existing 36-inch unlined reinforced concrete pipe.
- The Junction Structure MH3057-10 to South Cherry Avenue segment would rehabilitate one existing concrete manhole.

JUNCTION STRUCTURE MH3057-10 TO EAST CHURCH AVENUE

- The Junction Structure MH3057-10 to East Church Avenue segment would rehabilitate 1,183 linear feet of 34-inch by 53-inch elliptical sewer.
- The Junction Structure MH3057-10 to East Church Avenue segment would rehabilitate two existing concrete manholes.
- The Junction Structure MH3057-10 to East Church Avenue segment would rehabilitate existing concrete junction structure MH3056-36.

Downtown Water Transmission Main

This component is intended to provide additional water supply for the Downtown core area to support planned growth and infill within and northeast of the Fulton Street corridor. This project component is part of a transmission main in Downtown area as part of the Downtown Specific Plan. This larger transmission main project extends two 16-inch transmission grid mains down both Tuolumne Street and Tulare Street to O Street and P Street. The Downtown water transmission main project component consists of four different segments. Existing conditions and proposed conditions for each segment are described in detail below:

24-INCH H STREET DOWNTOWN TRANSMISSION MAIN

- Currently there is a 12-inch CIP pipe in H Street from Tuolumne Street to Tulare, installed around 1966. This pipe would be removed and replaced with the 24-inch transmission main pipe. It is anticipated the transmission main would be ductile iron pipe.
- The Downtown water transmission main involves the installation of 4,312 linear feet of 24-inch transmission main in H Street from East Mono Street to Calaveras Street. This transmission main would ultimately continue down H Street to connect to the existing 24-inch or 36-inch regional transmission main on H Street and Divisadero Street.

16-INCH TRANSMISSION GRID MAINS

- There is currently an 8-inch PVC pipe and a 12-inch CIP pipe in Calaveras Street that would be replaced by the proposed 16-inch transmission grid main. A 12-inch steel pipe installed in 1938 in Tuolumne Street would be replaced by the proposed 16-inch main. There are currently no pipes in Fulton Street and Van Ness Avenue. The 16-inch main in Tulare Avenue would replace approximately 1,180 linear feet of existing 12-inch CIP and steel pipe installed in the 1930's with new DIP from Van Ness Avenue to H Street.
- The 16-inch transmission grid mains would be installed in the northeast direction from the H Street transmission main. This project component involves the installation of a 16-inch diameter line from Calaveras Street to Fulton Street, Fulton Street to Tuolumne Street, Tuolumne Street to Van Ness Avenue for a total length of approximately 2,160 linear feet.

16-INCH VAN NESS AVENUE TRANSMISSION GRID MAINS

- The proposed 16-inch Van Ness transmission grid main segment extends from Tuolumne Street to Tulare Street along Van Ness Avenue. The proposed alignment would connect to the existing 12-inch water main or replace the existing 12-inch water main in Federal Alley in order to bypass around the existing pedestrian undercrossing in Mariposa Street alignment near the Fresno County Courthouse. The water main would continue to Tulare Street and connect to the existing 12-inch pipeline to the northeast and the proposed 16-inch line in Tulare Street to the southwest.

FEDERAL ALLEY MAIN REPLACEMENT

- The Federal Alley main replacement segment would replace two inconsistent diameter pipe sections in Federal Alley and upsize them to 12-inches. These alley main replacements are between Fresno Street and Mariposa Street and between Tulare Street and Kern Street.

G Street Water Replacement

EXISTING CONDITIONS

The existing water main on G Street is an existing 10-inch CIP material. To both the northwestern and southeastern sides of this main the existing water main is 12-inches. The age of these pipes is currently unknown. From city records, they are most likely assumed to be installed prior to 1940.

PROPOSED CONDITIONS

The limits of this portion of the project are between Tulare Street and Kern Street. As mentioned, the City prefers to have consistent diameter pipes along the same alignment to prevent hydraulic

losses within the distribution system. This component would remove the existing 10-inch water main and install 453 linear feet of 12-inch lines to match the adjacent pipe diameters. Existing parcels along G Street are currently served from China Alley, however the City prefers all future developments to connect to water mains in city streets, therefore future development would be connected to this 12-inch water line.

F Street New Water Pipeline

EXISTING CONDITIONS

Currently there is no transmission grid main in F Street. F Street parcels are served from both Fangan and China Alley. There is a 24-inch regional transmission main (RTM) in F Street, however the City prefers residential and commercial services to not connect directly to RTMs. The existing parcels on F Street between Fresno Street and Santa Clara Street are served from both Fagan Alley and China Alley. This area bound by G Street to the north and E Street to the south is considered a desirable location for development.

PROPOSED CONDITIONS

This component would install a 16-inch inch water main in F Street from Santa Clara Street approximately 3,250 linear feet. The proposed pipe would connect to the existing transmission grid mains in Mono Street, Kern Street, Tulare Street, Mariposa Street, and Fresno Street.

Similar to the Sanitary Sewer Services, the City strives to remove water services from alleys for future development, therefore the purpose of this proposed water pipeline is to allow for future development connections along F Street.

Construction and Grading

The proposed project would not involve structure demolition. The proposed demolition would consist of an existing sanitary sewer manhole, typically 48 to 60 inches in diameter and 10 to 14 feet deep and removing pavement or asphalt. No pile driving, blasting, rock breaking and processing, or groundwater dewatering would be required for construction of the project components. The proposed project would require excavation to a width of up to 54 inches.

Trenching would occur over 16,341 linear feet of waterlines and 3,568 linear feet of sewer pipelines, totaling 19,909 linear feet of trenching. Per the City of Fresno Standard Specifications Section 17-3.2.1, trenches would be specified to be a maximum of 30 inches for pipes 18 inches to 24 inches. The largest pipe in the proposed project would be 24 inches, which would replace an existing pipe on H street. It is anticipated that approximately 40 linear feet of pipes would be installed each day.

Construction of the proposed project would occur between January 2026 and June 2027. Construction activities would typically occur between 8:00 A.M. and 5:00 PM Monday through Friday. No nighttime construction is proposed.

Construction of the proposed project would entail 10-20 construction workers on site, on any given day. Construction personnel vehicles would be parked within the project site or within staging area as needed. Construction personnel may be dispersed and working on multiple portions of the project alignment. Staging is anticipated to occur within existing vacant parcels near or within the project site, with property owner's consent.

Construction of the project would have a ground disturbance of approximately four acres. Therefore, the project would be subject to the requirements of the National Pollutant Discharge Elimination System (NPDES) Construction General Permit, for which a Stormwater Pollution Prevention Plan (SWPPP) must be prepared, including best management practices to implement erosion control measures.

Approximately 26,700 cubic yards (cy) of soil would be excavated from the site, with approximately 5,032 cy exported via haul trucks and the remainder used as fill materials. Export of the soil would require a total of approximately 1,800 haul truck trips if using standard 3-cy truck. Alternatively, if super dump trucks are used, which can carry between 20 to 25 cy per load, the number of haul trips would be reduced to approximately 250 truck trips. Both options of trucks are considered as part of the project.

Operation and Maintenance

As previously discussed, the proposed project would involve 15,900 linear feet of waterline improvements and 13,400 linear feet of sewer improvements.

The project would not involve any new operation and maintenance activities. No new employees would be required.

7. Other Public Agencies Whose Approval is Required

The City of Fresno is the lead agency under CEQA with responsibility for approving the project. The project would also require the following approvals:

- Regional Water Quality Control Board – NPDES Construction Stormwater General Permit

8. Native American Consultation

Pursuant to Public Resources Code (PRC) Section 21080.3.1, CEQA requires consultation with the California Native American tribes that are traditionally and culturally affiliated with the project area. The Native American Heritage Commission (NAHC) was contacted on March 19, 2025, to request a Sacred Lands File (SLF) search for the project site and provide a contact list of Native American groups and/or individuals culturally affiliated with the area. On March 19, 2025, the NAHC stated that the results of the SLF search were negative.

The project is subject to compliance with Assembly Bill (AB) 52, which requires consideration of impacts to Tribal Cultural Resources (TCR) as part of the CEQA process, and that within 14 days of determining to undertake a project the lead agency notify California Native American tribal representatives who are traditionally or culturally affiliated with the geographic area of the Project and who have requested notification.

On April 17 and on April 22, 2025, the City of Fresno notified California Native American tribal representatives of the Project. Those notified include all that appear on the NAHC AB 52 contact list for the project, provided by the NAHC on April 9, 2025. Additionally, other California Native American tribal representatives were notified as well. Notification letters contained a project description, AB 52 noticing requirements, invitation to consult, and contact information for the appropriate City representative. AB 52 allows California Native American tribal representatives 30 days after receiving notification of the Project to request consultation. If a response pursuant to AB 52 is not received within 30 days, it is assumed that consultation is declined. To date, notification of

the Project initiated by the City has not resulted in the identification of a TCR within or near the project site.

The AB 52 notification period ended on May 23, 2025. Three responses from the notified California Native American tribal representatives were received by the City, none resulting in a request for consultation, and the AB 52 consultation process is completed.

For further discussion of tribal cultural resources in this IS-MND, please refer to Section 18*, Tribal Cultural Resources*, and Section 5, *Cultural Resources*. The City of Fresno will continue to comply with all applicable tribal consultation requirements of PRC Section 21080.3.1 and all other applicable regulations as the proposed project moves through the required review and approval process.

This page intentionally left blank.

Environmental Factors Potentially Affected

This project would potentially affect the environmental factors checked below, involving at least one impact that is "Potentially Significant" or "Less than Significant with Mitigation Incorporated" as indicated by the checklist on the following pages.

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

Determination

Based on this initial evaluation:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

■ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions to 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 "less than significant with mitigation incorporated" 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 potential 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.

Robert A. Diaz	October 10, 2025
Signature	Date
Robert A. Diaz	Project Manager
Printed Name	Title

Environmental Checklist

1 Aesthetics

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than - Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099, would the project:				
a. Have a 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 a publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☐	■
d. Create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?	☐	☐	☐	■

a. Would the project have a substantial adverse effect on a scenic vista?

According to the City of Fresno General Plan, parks, natural open spaces, and greenways are an important component to urban form, and they provide both recreational and aesthetic assets that contribute to the creation of a desirable visual character of the City of Fresno (City of Fresno 2024). The City's General Plan does not specifically define scenic vistas; therefore, there are no designated scenic vistas in the vicinity of the project site.

The project site is located in Downtown Fresno and consists of urban land surrounded by commercial and industrial development. The proposed project would not adversely affect parks, natural open spaces, and greenways as the project consists of pipelines that would be installed or rehabilitated underground, and the project site would be restored to pre-project conditions after the completion of construction activities. Paving of the existing access roads would not substantially alter views of the project site or the surrounding area. Therefore, the proposed project would not have a substantial adverse effect on a scenic vista. No impact would occur..

NO IMPACT

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

The project site is not located near a designated state scenic highway, as identified by the California Department of Transportation (Caltrans). The closest designated state scenic highway is State Route 180, located approximately 20 miles southeast of the project site (Caltrans 2025). Due to distance and intervening development between the project site and State Route 180, the project site is not visible from State Route 180. Therefore, the project would not substantially damage scenic resources within a state scenic highway. No impact would occur.

NO IMPACT

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

The proposed project would involve underground water and sewer improvements including the removal, replacement, and rehabilitation of existing pipelines within an urbanized area. Pursuant to California Government Code Section 53091, the building and zoning ordinances of a county or city do not apply to the location or construction of facilities for the production, storage, or transmission of water, wastewater, or electrical energy by a local agency. Paving of the existing road would not substantially alter the visual character of the project site, as all proposed work would be completed below ground and the project site would return to its existing visual character following completion of construction. Therefore, the proposed project would not substantially degrade visual character and does not conflict with any applicable local land use and zoning policies or other regulations governing scenic quality. No impact would occur.

NO IMPACT

d. Would the project create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?

Construction would occur during daytime hours and would not require the use of lighting. Therefore, construction-related impacts to light and glare would not occur. No permanent lighting or sources of glare be installed as part of the project. Therefore, operational-related impacts to light and glare would not occur.

NO IMPACT

2 Agriculture and Forestry Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than - Significant Impact	No Impact
Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on 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?	☐	☐	☐	■

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

b. Would the project conflict with existing zoning for agricultural use or a Williamson Act contract?

c. Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)); timberland (as defined by Public Resources Code Section 4526); or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?

d. Would the project result in the loss of forest land or conversion of forest land to non-forest use?

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

According to the California Department of Conservation's (DOC) Farmland Mapping and Monitoring Program, the project site is designated as Urban and Built-Up Land and Other Land (DOC 2025a). The project site and surrounding areas are not designated as Prime Farmland, Farmland of Statewide Importance, Unique Farmland, or Farmland of Local Importance. The project site is not under the Williamson Act or zoned for agricultural use (DOC 2025b). Therefore, the project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) to non-agricultural use and would not conflict with zoning for agricultural use or a Williamson Act contract. There is no adjacent land to the project site that is zoned or designated for agriculture. Due to the absence of agricultural land on or near the project site, the project would not involve changes to the existing environment that convert Farmland to non-agricultural use. No impact to agricultural resources would occur.

The project site and its surroundings do not contain forest land. Neither the project site nor surrounding properties are zoned for forest land, timberland, or timberland production. Therefore, the project would not involve changes to the existing environment that could result in the loss of forest land or the conversion of forest land to non-forest use. No impact to forestry resources would occur.

NO IMPACT

3 Air Quality

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than - Significant Impact	No Impact
Would the project:				
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?	☐	☐	■	☐

Air Quality Standards and Attainment

The project site is located in San Joaquin Valley Air Basin (SJVAB) under the jurisdiction of the San Joaquin Valley Air Pollution Control District (SJVAPCD). As the local air quality management agency, the SJVAPCD is required to monitor air pollutant levels to meet state and federal air quality standards and, if they are not met, to develop strategies to meet the standards.

Depending on whether or not the standards are met or exceeded, the SJVAB is classified as being in "attainment" or "nonattainment." Under state law, air districts are required to prepare a plan for air quality improvement for pollutants for which the district is in non-compliance. The SJVAB is in non-attainment for the federal standards for ozone and suspended particulate matter 2.5 microns or less ($PM_{2.5}$) and the state standards for ozone, suspended particulate matter 10 microns or less (PM_{10}) and $PM_{2.5}$ (SJVAPCD 2023). Characteristics and health implications of ozone and PM are described in Table 1.

Table 1 Health Effects Associated with Non-Attainment Criteria Pollutants

Pollutant	Adverse Effects
Ozone	(1) Short-term exposures: (a) pulmonary function decrements and localized lung edema in humans and animals and (b) risk to public health implied by alterations in pulmonary morphology and host defense in animals; (2) long-term exposures: risk to public health implied by altered connective tissue metabolism and altered pulmonary morphology in animals after long-term exposures and pulmonary function decrements in chronically exposed humans; (3) vegetation damage; and (4) property damage.
Suspended particulate matter (PM_{10})	(1) Excess deaths from short-term and long-term exposures; (2) excess seasonal declines in pulmonary function, especially in children; (3) asthma exacerbation and possibly induction; (4) adverse birth outcomes including low birth weight; (5) increased infant mortality; (6) increased respiratory symptoms in children such as cough and bronchitis; and (7) increased hospitalization for both cardiovascular and respiratory disease (including asthma).[a]
Suspended particulate matter ($PM_{2.5}$)	(1) Excess deaths from short- and long-term exposures; (2) excess seasonal declines in pulmonary function, especially in children; (3) asthma exacerbation and possibly induction; (4) adverse birth outcomes, including low birth weight; (5) increased infant mortality; (6) increased respiratory symptoms in children, such as cough and bronchitis; and (7) increased hospitalization for both cardiovascular and respiratory disease, including asthma.[a]

[a] More detailed discussions on the health effects associated with exposure to suspended particulate matter can be found in the following documents: EPA, Air Quality Criteria for Particulate Matter, October 2004.

Source: U.S. EPA, https://www.epa.gov/criteria-air-pollutants

Air Quality Management

Under state law, the SJVAPCD is required to prepare a plan for air quality improvement for pollutants for which the SJVAPCD is in non-compliance. The SJVAPCD adopted the 2022 Plan for the 2015 8-Hour Ozone Standard in December 2022. This Plan satisfies Clean Air Act (CAA) requirements and ensures expeditious attainment of the 70 parts per billion 8-hour ozone standard (SJVAPCD 2024).

The 2016 Plan for the 2008 8-Hour Ozone Standard (2016 Ozone Plan) addresses the federal mandates related to the 2008 8-Hour ozone National Ambient Air Quality Standards (NAAQS). This plan builds upon the approaches taken in the 2007 8-Hour Ozone Plan, and highlights current regulatory measures that have met and exceed federal CAA requirements as well as acknowledge the significant amount of reductions to be achieved. The deadline for the San Joaquin Valley (Valley) to attain the 2008 8-Hour Ozone Standard is December 31, 2031. This requires another 207.7 tons per day in NO_X reductions from stationary and mobile sources throughout the Valley. Currently, the ozone precursor emissions in the Valley are at historically low levels with approximately 80 percent reduction in NO_X stationary source emissions since 1990.

In addition, SJVAPCD updated their $PM_{2.5}$ standards in 2018, with their 2018 Plan for the 1997, 2006, and 2012 $PM_{2.5}$ Standards (2018 $PM_{2.5}$ Plan). This plan develops a strategy to attain the federal health-based 1997, 2006, and 2012 NAAQS for $PM_{2.5}$ (SJVAPCD 2018). The 2018 $PM_{2.5}$ Plan addresses multiple federal $PM_{2.5}$ standards and outlines a combination of innovative regulatory and non-regulatory measures for mobile, stationary, and area source control. Additionally, the SJVAPCD adopted the 2007 PM_{10} Maintenance Plan and Request for Redesignation in 2007 (2007 PM_{10} Plan) (SJVAPCD 2007). In June 2024, the SJVAPCD adopted the 2024 Plan for the 2012 Annual $PM_{2.5}$ Standard (2024 $PM_{2.5}$ Plan) (SJVAPCD 2024). The 2024 $PM_{2.5}$ Plan demonstrates attainment of the 2012 standard by 2030.

Toxic Air Contaminants

In 1983, the California Legislature enacted a program to identify the health effects of TACs and to reduce exposure to these contaminants to protect the public health (Assembly Bill [AB] 1807: H&SC Sections 39650–39674). The Legislature established a two-step process to address the potential health effects from TACs. The first step is the risk assessment (or identification) phase. The second step is the risk management (or control) phase of the process.

The California Air Toxics Program establishes the process for the identification and control of TACs and includes provisions to make the public aware of significant toxic exposures and for reducing risk. Additionally, the Air Toxics "Hot Spots" Information and Assessment Act (AB 2588) was enacted in 1987 and requires stationary sources to report the types and quantities of certain substances routinely released into the air. The goals of the Air Toxics "Hot Spots" Act are to collect emission data, identify facilities having localized impacts, ascertain health risks, notify nearby residents of significant risks, and reduce those significant risks to acceptable levels. The Children's Environmental Health Protection Act, Senate Bill 25 (Chapter 731, Escutia, Statutes of 1999), focuses on children's exposure to air pollutants. The act requires CARB to review its air quality standards from a children's health perspective, evaluate the statewide air quality monitoring network, and develop any additional air toxic control measures needed to protect children's health.

CO Hotspots

In response to growing concerns about localized air pollution, California developed a framework to identify and mitigate areas with elevated concentrations of carbon monoxide (CO), commonly referred to as CO hotspots. These are locations—often near busy roadways or intersections—where CO levels may exceed state or federal air quality standards, posing health risks to nearby populations. The California Environmental Quality Act (CEQA) and federal transportation conformity regulations require that transportation projects in nonattainment or maintenance areas for CO demonstrate that they will not cause or contribute to new violations of CO standards, worsen existing violations, or delay timely attainment of the standards. The SJVAB is in conformance with state and federal CO standards, and most air quality monitoring stations no longer report CO levels.

Methodology

The project involves water and sewer infrastructure upgrades within the Downtown Fresno triangle, and therefore, would not be anticipated to result in operational emissions of criteria pollutants due to the passive nature of a pipeline. Therefore, modeling focuses on construction emissions. Emissions for construction of the project were estimated using the California Emissions Estimator Model Version 2022.1.1.29 (CalEEMod). The analysis reflects construction of the project as described in the Project Description; CalEEMod default values for the construction phases, duration, and equipment were adjusted to match the project's estimated construction schedule and equipment list. The modeling conservatively assumed that the demolition, site preparation, grading, and pipeline installation phases would overlap for the entire construction period. Specific model inputs are provided in Appendix A.

It was assumed the proposed project would comply with applicable regulatory standards, including SJVAPCD's Regulation VIII construction dust control requirements. As such, twice daily site watering was incorporated into CalEEMod.

Air Emission Thresholds

The SJVAPCD has established individual project-level thresholds for temporary construction-related and long-term operational emissions of air pollutants, shown in Table 2. These thresholds represent the levels at which a project's individual emissions of criteria air pollutants or precursors would result in a cumulatively considerable net increase of criteria pollutants for which the SJVAB is in non-attainment under Federal and/or State ambient air quality standards (SJVAPCD 2015).

Table 2 SJVAPCD Thresholds of Significance

Pollutant/ Precursor	Construction Emissions (tpy)	Operational Emissions (tpy)
ROG	10	10
CO	100	100
SO_x	27	27
NO_X	10	10
PM_{10}	15	15
$PM_{2.5}$	15	15

Notes: tpy = tons per year, NO_X = oxides of nitrogen; $PM_{2.5}$ = fine particulate matter with an aerodynamic resistance diameter of 2.5 micrometers or less; PM_{10} = respirable particulate matter with an aerodynamic resistance diameter of 10 micrometers or less; ROG = reactive organic gases

Source: Table 2, Section 8.3, SJVAPCD 2015.

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

As described above, the SJVAB is in non-attainment for the federal standards for ozone and $PM_{2.5}$ and the state standards for ozone, PM_{10}, and $PM_{2.5}$. To achieve attainment and maintenance of federal and state air quality standards, SJVAPCD has adopted the 2022 Ozone Plan, 2024 $PM_{2.5}$ Plan, and 2007 PM_{10} Plan. SJVAPCD's *Guidance for Assessing and Mitigating Air Quality Impacts* does not provide specific guidance for determining a project's consistency with these applicable air quality plans. However, a project would generally be consistent with the air quality plans if it would not result in an increase in the frequency or severity of existing air quality violations or contribute to new violations, would conform to the assumptions employed in emissions inventorying and modeling in support of the air quality plans, and would comply with applicable control measures outlined in the air quality plans.

As discussed under threshold b and shown in Table 3, below, the project would not result in substantial operational emissions of criteria pollutants and construction emissions would be under significance thresholds established by SJVAPCD. Therefore, the project would not exacerbate existing exceedances of air quality standards or contribute to new violations. Emissions modeling and planning conducted in support of SJVAPCD's air quality plans are based on growth projections, land use, and vehicle miles traveled (VMT) information provided by the FCOG (SJVAPCD 2015). The project would be consistent with these growth assumptions employed in the air quality plans because, as a water-sewer improvement project, the proposed project would not result in population growth or increases in VMT beyond those used in SJVAPCD estimates. Finally, the project would be required to conform to all SJVAPCD control-measures, including construction dust suppression requirements under SJVAPCD Regulation VIII. Given the above considerations, the project would not conflict with or obstruct implementation of the applicable air quality plans. Impacts would be less than significant.

LESS THAN SIGNIFICANT 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?

According to SJVAPCD *Guidance for Assessing and Mitigating Air Quality Impacts* (GAMAQI), projects determined to be significant due to an exceedance of SJVAPCD thresholds would result in a cumulatively considerable net increase of criteria pollutants. Furthermore, projects which would cause a worsening of areas already exceeding those standards would be considered to result in a cumulatively considerable net increase of criterial pollutants (SJVAPCD 2015). The following discussion addresses potential air quality emissions impacts from the proposed project's construction and operational activities.

Construction

The proposed project would involve 15,900 linear feet of waterline improvements and 13,400 linear feet of sewer rehabilitation. Construction activities would include installation, replacement, or rehabilitation of pipelines, manholes, and junction structures. Demolition would precede, where applicable, the installation of the proposed features. Rehabilitation activities would not require demolition. Table 3 summarizes the estimated maximum daily emissions (tons per year [tpy]) of pollutants associated with construction of the project. As shown below, ROG, NO_X, CO, SO_2, PM_{10}, and $PM_{2.5}$ emissions would remain below SJVAPCD thresholds. As such, construction-related air quality emissions would not result in a cumulatively considerable net increase of any criteria pollutant for which the region is in non-attainment. This impact would be less than significant.

Table 3 Annual Construction Emissions

Pollutant	Maximum Annual Construction Emissions (tpy)	Significance Threshold (tpy)	Significant Impact?
ROG	1	10	No
NO_x	5	10	No
CO	6	100	No
SO_x	<0.1	27	No
PM_{10}	<1	15	No
$PM_{2.5}$	<1	15	No

tpy = tons per year

See Appendix A for CalEEMod worksheets.

Operation

The proposed project would not involve any new operation and maintenance activities for the Downtown water and sewer system. No new employees would be required, and no additional worker trips would be added. Given the project's minimal potential to generate operational air quality emissions, combined with the fact that the project would not generate new vehicle trips or employees once construction is complete, project operation would not result in a cumulatively considerable net increase of criteria pollutants. This impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

Construction

Construction-related activities would result in short-term, project-generated emissions of diesel particulate matter (DPM) exhaust emissions from off-road, heavy-duty diesel equipment for demolition, site preparation, grading, and paving activities. DPM was identified as a toxic air contaminant (TAC) by CARB in 1998.

Generation of DPM from construction projects typically occurs in a single area for a short period. Construction of the proposed project would occur over approximately 18 months. The dose to which the receptors are exposed is the primary factor used to determine health risk. Dose is a function of the concentration of a substance or substances in the environment and the extent of exposure that person has with the substance. Dose is positively correlated with time, meaning that a longer exposure period would result in a higher exposure level for the Maximally Exposed Individual. The risks estimated for a Maximally Exposed Individual are higher if a fixed exposure occurs over a longer period of time. In the case of this project, which anticipates that approximately 40 linear feet of pipes would be installed each day, construction would not be in a fixed location, with activities moving to different locations within the project area as construction progresses, lessening the length of time that a single receptor is exposed to DPM.

According to the Office of Environmental Health Hazard Assessment (OEHHA), health risk assessments, which determine the exposure of sensitive receptors to toxic emissions, should be based on a 70-year exposure period; however, such assessments should be limited to the period/duration of activities associated with the project. Thus, the duration of proposed construction activities (i.e., 18 months) is approximately three percent of the total exposure period used for health risk calculation. However, current models and methodologies for conducting health-risk assessments are associated with longer-term exposure periods of 9, 40, and 70 years, which do not correlate well with the temporary and highly variable nature of construction activities, resulting in difficulties in producing accurate estimates of health risk.

The maximum PM_{10} and $PM_{2.5}$ emissions would occur during the paving and site restoration phase. These activities would last for approximately eighteen months starting from January 2026. While the maximum diesel PM emissions associated with paving activities would only occur for a portion of the overall construction period, these activities represent the worst case condition for the total construction period. This would represent less than four percent of the total exposure period for health risk calculation. Therefore, given the short-term, and mobile nature of construction activities, DPM generated by project construction is not expected to create conditions where nearby sensitive receptors would be exposed to substantial pollutant concentrations. This impact would be less than significant.

Operation

A CO hotspot is a localized concentration of CO that is above a CO ambient air quality standard. Localized CO hotspots can occur at intersections with heavy peak hour traffic. Specifically, hotspots can be created at intersections where traffic levels are sufficiently high such that the local CO concentration exceeds the federal one-hour standard of 35.0 parts per million (ppm) or the federal and state eight-hour standard of 9.0 ppm (CARB 2016). The proposed project would not consist of heavy traffic or idle vehicles, therefore emitting very low operational CO emissions.

The SJVAB is in conformance with state and federal CO standards, and most air quality monitoring stations no longer report CO levels. No stations within the vicinity of the project site have monitored CO since 2012. In 2012, the Fresno-Garland station detected an 8-hour maximum CO concentration of 2.06 ppm, which is substantially below the state and federal standards (CARB 2025). Project operation would not result in substantial mobile trip generation beyond what is currently required for annual pipeline maintenance. Based on the low background level of CO in the project area and the fact that the project would not generate any new mobile trips, the project would not create new hotspots or contribute substantially to existing hotspots. This impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

For construction activities, odors would be short-term in nature and are subject to SJVAPCD Rule 4102, Nuisance. Construction activities would be temporary and transitory and associated odors would cease upon construction completion. Accordingly, the project would not create objectionable odors affecting a substantial number of people during construction, and project construction should have a less than significant impact in the short-term.

Common sources of operational odor complaints include sewage treatment plants, landfills, recycling facilities, and agricultural uses. The project would not include any of these uses that are known to generate odors, other than the presence of sewer manholes, which can become a source of odors if an issue arises with the larger sewer system (i.e., backup, spill). Even so, the project would not generate substantial odors that would impact a substantial number of people. Therefore, the project would have a less than significant impact on operational odors.

LESS THAN SIGNIFICANT IMPACT

This page intentionally left blank.

4 Biological Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than - Significant Impact	No Impact
Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	■	☐	☐
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐	■
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	■
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?	☐	☐	☐	■

In April 2025, Rincon Consultants, Inc. prepared a Biological Resources Technical Memorandum, including a desktop review and field reconnaissance surveys, to document existing site conditions and the potential presence of special-status biological resources, including plant and wildlife species, plant communities, jurisdictional waters and wetlands, and habitat for nesting birds. The biological reconnaissance survey encompassed the proposed project footprint and 50-foot buffer (referred to as "study area" in this section). The following analysis is based on the findings of the biological assessment, the complete Biological Resources Technical memorandum is contained in Appendix B of this document.

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?

Based on queries of biological resource databases performed for the Biological Resources Technical Memorandum, 11 special-status plant species and 29 special-status wildlife species are known to occur within one mile of the study area. However, none of these special-status species are expected to occur within the study area, as the site is located in an urban Downtown area which is mostly developed, disturbed, or degraded. Therefore, impacts related to special-status plant and wildlife species would be less than significant.

The study area contains ornamental trees and shrubs which may provide nesting habitat for native passerines and common raptors. Corvids, like American crows (*Corvus brachyrhynchos*), may nest on telephone and power poles in the survey area, and ground nesting species, such as killdeer (*Charadrius vociferus*), may also be found throughout the study are. Migratory or other common nesting birds, while not designated as special-status species, are protected by Section 3503.5 of the California Fish and Game Code (CFGC) and federal Migratory Bird Treaty Act (MBTA) and have the potential to nest within and adjacent to the study area. Therefore, construction of the project has the potential to directly (by destroying a nest) or indirectly (through construction noise, dust, and other human disturbances that may cause a nest to fail) impact nesting birds protected under the CFGC and MBTA. Implementation of Mitigation Measure BIO-1 would require a pre-construction nesting bird survey if construction occurs during the nesting bird season (February 1 to August 31). Implementation of Mitigation Measure BIO-1 would maintain compliance with CFGC 3503 and the MBTA and impacts to nesting birds would be less than significant.

Mitigation Measure

BIO-1 Pre-Construction Nesting Bird Surveys and Avoidance

If project-related activities occur during the avian nesting season (February 1 to August 31), a preconstruction nesting bird survey should be performed by a qualified biologist within the disturbance footprint plus a 100-foot buffer (250 feet for raptors), where feasible, and no more than one week prior to initiation of ground disturbance and/or vegetation removal activities. If the proposed project is phased or construction activities stop for more than one week, a subsequent preconstruction nesting bird survey would be required prior to each phase of construction.

If any active nests are observed during surveys, a suitable avoidance buffer from the nests should be determined by a qualified biologist based on species, location, and extent and type of planned construction activity. These nests would be avoided until the chicks have fledged and the nests are

no longer active, as determined by the qualified biologist. If no nesting birds are observed during preconstruction surveys, no further actions would be necessary.

Significance After Mitigation

Implementation of Mitigation Measure BIO-1 would require a pre-construction nesting bird survey if construction occurs during the nesting bird season (February 1 to August 31). Implementation of Mitigation Measure BIO-1 would maintain compliance with CFGC 3503 and the MBTA and impacts to nesting birds would be less than significant.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

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, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

The study area does not contain any sensitive natural vegetation communities (Appendix B). A freshwater pond is mapped in the National Wetland Inventory on the north corner of the intersection of Inyo Street and H Street; however, the pond is no longer present due to the construction of Chukchansi Park. Therefore, the proposed project would not have an adverse effect on a riparian habitat or other identified sensitive natural communities. No impact would occur.

NO IMPACT

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

In accordance with Section 1602 of the CFGC, CDFW has jurisdiction over lakes and streambeds (including adjacent riparian resources). CDFW regulates wetland areas only to the extent that those wetlands are part of a river, stream, or lake. Under Section 404 of the CWA, the United States Army Corps of Engineers has authority to regulate activities that discharge dredge or fill material into wetlands or other "waters of the United States" through issuance of a Section 404 Permit. Finally, the Regional Water Quality Control Board has jurisdiction over "waters of the state" pursuant to the Porter-Cologne Water Quality Control Act and has the responsibility for review of the project water quality certification per Section 401 of the federal CWA. In addition, Executive Order 11990 directs federal agencies to avoid adverse impacts to wetlands.

A freshwater pond is mapped in the National Wetland Inventory on the north corner of the intersection of Inyo Street and H Street; however, the pond is no longer present due to the construction of Chukchansi Park. Although a formal aquatic resource delineation was not performed during the field survey, no potentially jurisdictional waters or wetlands were observed in the study area. As a result, no impact to jurisdictional resources would occur.

NO IMPACT

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

Wildlife corridors, or habitat linkages, are generally defined as connections between habitat patches that allow for physical and genetic exchange between otherwise isolated animal populations. Such linkages may serve a local purpose, such as between foraging and denning areas, or they may be

regional in nature, allowing movement across the landscape. Some habitat linkages may serve as migration corridors, wherein animals periodically move away from an area and then subsequently return. Others may be important as dispersal corridors for young animals. A group of habitat linkages in an area can form a wildlife corridor network (Spencer et al. 2010).

There are no wildlife movement corridors mapped within the study area, and the closest wildlife movement corridor is mapped over 10 miles northwest of the study area (Appendix B). Therefore, no impact to wildlife movement corridors would occur.

NO IMPACT

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

The Fresno General Plan (2014) was reviewed and biological resources goals and policies in the General Plan are not relevant to the proposed project due to the developed nature of the study area. Therefore, the proposed project would not conflict with any local policies or ordinances protecting biological resources and no impact would occur.

NO IMPACT

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

The project is not subject to an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan. Therefore, no impact would occur.

NO IMPACT

5 Cultural Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than - Significant Impact	No Impact
Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to §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 formal cemeteries?	☐	☐	■	☐

This section provides an analysis of the project's impacts on cultural resources, including historical and archaeological resources as well as human remains. Under CEQA (PRC Section 21084.1), a project may significantly affect historical resources if it alters or damages resources listed in or eligible for the California Register of Historical Resources (CRHR), local registers, or those deemed significant by the lead agency with supporting evidence (CEQA Guidelines Section 15064.5). CEQA requires a lead agency to determine whether a project may have a significant effect on historical resources (Public Resources Code [PRC] Section 21084.1). A historical resource is a resource listed in, or determined to be eligible for listing in, the California Register of Historical Resources (CRHR); a resource included in a local register of historical resources; or any object, building, structure, site, area, place, record, or manuscript a lead agency determines to be historically significant provided the lead agency's determination is supported by substantial evidence in light of the whole record (CEQA Guidelines Section 15064.5[a][1-3]).

A resource shall be considered historically significant if it:

1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
2. Is associated with the lives of persons important in our past;
3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
4. Has yielded, or may be likely to yield, information important in prehistory or history.

Archaeological resources not qualifying as historical may meet the definition of a "unique archaeological resource" under PRC Section 21083.2 if they:

1. Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information;
2. Has a special and particular quality such as being the oldest of its type or the best available example of its type; or

3. Is directly associated with a scientifically recognized important prehistoric or historic event or person.

According to CEQA Guidelines Section 15064.5(b), an impact that results in a substantial adverse change in the significance of a historical resource is considered a significant impact on the environment. A substantial adverse change could result from physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of the historical resource would be materially impaired (CEQA Guidelines Section 15064.5[b][1]). Material impairment is defined as demolition or alteration in an adverse manner of those characteristics of a historical resource that convey its historical significance and that justify its inclusion in, or eligibility for inclusion in, the CRHR or a local register (CEQA Guidelines Section 15064.5[b][2]).

If it can be demonstrated that a project would cause damage to a unique archaeological resource, the lead agency may require reasonable efforts be made to permit any or all of these resources to be preserved in place or left in an undisturbed state. To the extent that resources cannot be left undisturbed, mitigation measures are required (PRC Section 21083.2[a-c]).

The impact analysis included here is organized based on the cultural resources thresholds included in CEQA Guidelines Appendix G: Environmental Checklist Form. Threshold (a) broadly refers to historical resources while threshold (b) broadly refers to archaeological resources. To more clearly differentiate between historical resources of the built environment (architectural) and those of an archaeological nature, built environment resources are considered under threshold (a) and archaeological resources are considered under threshold (b).

Methodology and Results of Cultural Resources Assessment

The analysis in this section is based on the cultural resources assessment prepared for the project by Rincon in July 2025. The assessment consisted of the following:

- A cultural resources records search of the California Historical Resources Information System (CHRIS)
- A cultural resources files search of the California High Speed Rail Authority (HSR; written approval to review records received May 15, 2025, from HSR)
- Sacred Lands File (SLF) search by the Native American Heritage Commission (NAHC)
- Review of historical maps and aerial imagery, and geoarchaeological review
- Pedestrian survey of the project site

The CHRIS records search identified 93 known resources within 100 ft. of the project site and the HSR files search identified 32 resources within 500 ft. of the project site (some of which overlap with the data provided by the CHRIS). In total, the CHRIS and HSR records searches resulted in the identification of 12 resources within the project site (including three historic districts) and 11 resources adjacent and/or with the potential to extend into the project site. Table 4, *Cultural Resources Potentially Impacted by the Project*, provides a summary of the cultural resources that may be impacted by the project.

Resources identified within the project site:

- **Historic Districts**
  - Fresno Nihonmachi District (SSJVIC P-10-004294)
  - Chinese American Community District (SSJVIC P-10-004268)
  - Town of Fresno District (SSJVIC P-10-007206/CA-FRE-3920H)
  - Architectural Resources Group (ARG) Chinatown District
  - HSR Chinatown District
- **Historic-Period Archaeological Sites**
  - Fresno Avenue and F Street (SSJVIC P-10-007224)
  - Fresno Street Trolley Tracks Segment (HSR)
  - Fresno Traction Company's F Street Line (SSJVIC P-10-006469/CA-FRE-3725H)
  - Tulare and H Street Streetcar Tracks (HSR FB-10-0151)
  - Chinese Shanty (HSR FB-10-0149)
- **Historic-Period Isolates**
  - SSJVIC P-10-007214
  - SSJVIC P-10-007219

Resources identified as adjacent to and/or have the potential to extend into the project site (all of which are historic period archaeological sites):

- California Packing Plant (SSJVIC P-10-004932)
- Raisin Conveyor Tunnel (HSR FB-10-0140/APN 467-030-29)
- Mattei Building Steam Tunnel (SSJVIC P-10-007225)
- Mariposa Street Boardwalk (HSR FB-10-0138)
- Inyo Street Boardwalk (HSR FB-10-0146/FB-10-0151)
- Central Fish Sidewalk (HSR APN 467-071-06)
- Historic Period Trash Scatter (SSJVIC P-10-006144/CA-FRE-3618H)
- Historic-Period Refuse Deposit (P-10-006977/CA-FRE-3817H, HSR FB-10-0501/APN 467-081-06)
- Privy Pit (SSJVIC P-10-007082/CA-FRE-3846H)
- Four Historic-Period Refuse Deposits (SSJVIC P-10-007362/CA-FRE-3957H)
- Historic-Period Refuse Deposit (SSJVIC P-10-007363/CA-FRE-3958H)

No prehistoric archaeological resources were identified as a result of the records searches.

Of the 12 resources within the project site, three have been previously identified as ineligible for listing in the California Register of Historical Resources (CRHR) and National Register of Historic Places (NRHP), four have been identified as eligible for listing in the NRHP and therefore automatically listed in the CRHR or are eligible for listing in the City Local Register, and five are unevaluated.

- **Resources within the project site identified as ineligible for the CRHR and NRHP**
  - Fresno Street Trolley Tracks Segment (HSR)
  - Fresno Traction Company's F Street Line (SSJVIC P-10-006469/CA-FRE-3725H)
  - Tulare and H Street Streetcar Tracks (HSR)

- Resources within the project site identified as eligible for the CRHR, NRHP, or local listing:
- Fresno Nihonmachi District (SSJVIC P-10-004294)
- ARG Chinatown District
- Town of Fresno District (SSJVIC P-10-007206/CA-FRE-3920H)
- Chinese Shanty (HSR FB-10-0149)

- **Resources within the project site that are unevaluated:**
  - Chinese American Community (SSJVIC Resource P-10-004268]
  - HSR Chinatown District
  - Fresno Avenue and F Street (SSJVIC P-10-007224)
  - Historic-Period Isolate (SSJVIC P-10-007214)
  - Historic-Period Isolate (SSJVIC P-10-007219)

Of the 11 resources that are adjacent and/or have the potential to extend into the project site, four have been previously identified as ineligible for listing in the CRHR and NRHP, two have been identified as eligible for listing in the CRHR, NRHP, and/or City Local Register, and five are unevaluated.

- **Resources adjacent and/or have the potential to extend into the project site identified as ineligible for listing in the CRHR and NRHP**
  - California Packing Plant (SSJVIC P-10-004932)
  - Historic-Period Raisin Conveyor Tunnel (HSR FB-10-0140/APN 467-030-29)
  - Four Historic-Period Refuse Deposits (SSJVIC P-10-007362 /CA-FRE-3957H)
  - Historic-Period Refuse Deposit (SSJVIC P-10-007363 /CA-FRE-3958H)

- **Resources adjacent and/or have the potential to extend into the project site identified as eligible for listing in CRHR, NRHP, and/or local listing**
  - Mattei Building Steam Tunnel (SSJVIC P-10-007225)
  - Historic-Period Privy Pit (SSJVIC P-10-007082/CA-FRE-3846H)

- **Resources adjacent and/or have the potential to extend into the project site that are unevaluated**
  - Mariposa Street Boardwalk (HSR FB-10-0138)
  - Inyo Street Boardwalk (HSR FB-10-0146/FB-10-0151)
  - Central Fish Sidewalk (HSR APN 467-071-06)
  - Historic-Period Trash Scatter (SSJVIC P-10-006144/CA-FRE-3618H)
  - Historic-Period Refuse Deposit (SSJVIC P-10-006977/CA-FRE-3817H/HSR FB-10-0501/APN 467-081-06)

Furthermore, four eligible and unevaluated resources (Chinese Shanty [HSR Resource FB-10-0149], Mattei Building Steam Tunnel [SSJVIC Resource P-10-007225], Central Fish Sidewalk [HSR Resource APN 467-071-06], and Historic-Period Privy Pit [SSJVIC Resource P-10-007082/CA-FRE-3846H]) may also be eligible for listing as contributors to Fresno Chinatown District (Chinese American Community [SSJVIC P-10-004268], ARG Chinatown District, and HSR Chinatown District), and/or the Town of Fresno District (SSJVIC P-10-007206/CA-FRE-3920H).

Table 4 Cultural Resources Potentially Impacted by the Project

Resource Number/Name	Resource Type	Individual Eligibility Status	Eligibility Criteria	Poten Distri
Resources Within the Project Site				
Fresno Nihonmachi District (SSJVIC Resource P-10-004294)	Built Environment District	Eligible	Appears eligible for NR as a contributor to a NR eligible multi-component resource through survey evaluation (Status Code 3D)	NA
*Fresno Chinatown District (SSJVIC Resource P-10-004268 [Chinese American Community])	Built Environment District	Unevaluated	Two contributing buildings are on the City of Fresno Local Register as H.P. #65 and #66 and are individually listed on the BERD as eligible for the NR	N/A
*Fresno Chinatown District (ARG Chinatown District)	Built Environment District	Eligible	Recommended eligible for the City of Fresno Local Register under Criterion I	N/A
*Fresno Chinatown District (HSR Chinatown District)	Built Environment and Archaeological District	Unevaluated	N/A	N/A
SSJVIC Resource P-10-007206/ CA-FRE-3920H (Town of Fresno District)	Archaeological District	Eligible	Recommended eligible for NRHP under Criterion D	N/A
SSJVIC Resource P-10-007224 (Fresno Avenue and F Street)	Trolley/Streetcar Segment	Unevaluated	N/A	N/A
HSR Fresno Street Trolley Tracks Segment	Trolley/Streetcar Segment	Ineligible	Segment recommended ineligible for the CRHR and NRHP (does not meet Criteria A/1, B/2, C/3, or D/4); SHPO concurrence assumed for HSR APE	Ineligi
SSJVIC Resource P-10-006469/CA-FRE-3725H (Fresno Traction Company's F Street Line)	Trolley/Streetcar Segment	Ineligible	Segment recommended ineligible for the CRHR and NRHP (does not meet Criteria A/1, B/2, C/3, or D/4); SHPO concurrence assumed for HSR APE	Ineligi
HSR Resource FB-10-0151 (Tulare and H Street Streetcar Tracks)	Trolley/Streetcar Segment	Ineligible	Segment recommended ineligible for the CRHR and NRHP (does not meet Criteria A/1, B/2, C/3, or D/4); SHPO concurrence assumed for HSR APE	Ineligi
HSR Resource FB-10-0149 (Chinese Shanty)	Historic-Period Archaeological Deposit	Eligible	Recommended eligible for the CRHR and NRHP under Criterion 4/D; SHPO concurrence not yet received	Likely China Fresn Criter

Resource Number/Name	Resource Type	Individual Eligibility Status	Eligibility Criteria	Poten Distri
SSJVIC Resource P-10-007214 (Historic-Period Isolate)	Historic-Period Isolate	Ineligible	While not formally evaluated, isolates are typically ineligible for CRHR and NRHP listing	Ineligi
SSJVIC Resource P-10-007219 (Historic-Period Isolate)	Historic-Period Isolate	Ineligible	While not formally evaluated, isolates are typically ineligible for CRHR and NRHP listing	Ineligi
Resources Within the Project Site				
SSJVIC Resource P-10-004932 (California Packing Plant)	Historic-Period Fruit Packing Plant	Ineligible	Recommended ineligible for the CRHR and NRHP (does not meet Criteria A/1, B/2, C/3, or D/4); SHPO concurrence assumed for HSR APE	Ineligi
HSR Resource FB-10-0140/APN 467-030-29 (Historic-Period Raisin Conveyor Tunnel)	Historic-Period Raisin Conveyor Tunnel	Ineligible	Recommended ineligible for the CRHR and NRHP (does not meet Criteria A/1, B/2, C/3, or D/4); SHPO concurrence assumed for HSR APE	Ineligi
SSJVIC Resource P-10-007225 (Mattei Building Steam Tunnel)	Historic-Period Steam Tunnel	Eligible	Unevaluated for the CRHR or NRHP but recommended as eligible for the City of Fresno Local Register as it relates to the Mattei Building	Likely Fresn Criter
HSR Resource FB-10-0138 (Mariposa Street Boardwalk)	Historic-Period Boardwalk	Unevaluated	N/A	N/A
HSR Resource FB-10-0146 and FB-10-0151 (Inyo Street Boardwalk)	Historic-Period Boardwalk	Unevaluated	N/A	N/A
HSR Resource APN 467-071-06 (Central Fish Sidewalk)	Historic-Period Archaeological Deposit	Unevaluated	N/A	Likely China Fresn Criter
SSJVIC Resource P-10-006144/CA-FRE-3618H (Historic-Period Trash Scatter)	Historic-Period Archaeological Deposit	Unevaluated	N/A	N/A
SSJVIC Resource P-10-006977/CA-FRE-3817H/HSR Resource FB-10-0501/APN 467-081-06 (Historic-Period Refuse Deposit)	Historic-Period Archaeological Deposit	Unevaluated	N/A	N/A
SSJVIC Resource P-10-007082/CA-FRE-3846H (Historic-Period Privy Pit)	Historic-Period Archaeological Deposit	Eligible	Recommended eligible under Criteria 1/A and 4/D; SHPO concurrence received under Criterion D	Likely China Fresn Criter

Resource Number/Name	Resource Type	Individual Eligibility Status	Eligibility Criteria	Poten Distri
SSJVIC Resource P-10-007362/CA-FRE-3957H (Four Historic-Period Refuse Deposits)	Historic-Period Archaeological Deposit	Ineligible	Recommended ineligible for the CRHR and NRHP (does not meet Criteria A/1, B/2, C/3, or D/4); SHPO concurrence assumed for HSR APE	Ineligi
SSJVIC Resource P-10-007363/CA-FRE-3958H (Historic-Period Refuse Deposit)	Historic-Period Archaeological Deposit	Ineligible	Recommended ineligible for the CRHR and NRHP (does not meet Criteria A/1, B/2, C/3, or D/4); SHPO concurrence assumed for HSR APE	Ineligi

Of the 23 resources within or adjacent and/or have the potential to extend into the overall project site described above, a total of nine resources have been previously identified as ineligible for listing in the CRHR and the NRHP, or due to their isolated nature do not qualify as historical resources or qualify as unique archaeological resources under CEQA and therefore do not require any further consideration:

- **Resources previously identified as ineligible**
  - Fresno Street Trolley Tracks Segment (HSR)
  - Fresno Traction Company's F Street Line (SSJVIC P-10-006469/CA-FRE-3725H)
  - Tulare and H Street Streetcar Tracks (HSR FB-10-0151)
  - California Packing Plant (SSJVIC P-10-004932)
  - Historic-Period Raisin Conveyor Tunnel (HSR FB-10-0140/APN 467-030-29)
  - Four Historic-Period Refuse Deposits (SSJVIC P-10-007362/CA-FRE-3957H)
  - Historic-Period Refuse Deposit (SSJVIC P-10-007363/CA-FRE-3958H)
- **Historic-period Isolates (which are ineligible)**
  - Historic-Period Isolate (SSJVIC P-10-007214)
  - Historic-Period Isolate (SSJVIC P-10-007219)

Of the 23 resources within or adjacent/with the potential to extend into the project site described above, five are identified as eligible for listing in the NRHP and/or CRHR and qualify as historical resources:

- Fresno Nihonmachi District (SSJVIC P-10-004294)
- Town of Fresno District (SSJVIC P-10-007206/CA-FRE-3920H)
- Chinese Shanty (HSR FB-10-0149)
- Mattei Building Steam Tunnel (SSJVIC P-10-007225)
- Historic-Period Privy Pit (SSJVIC P-10-007082/CA-FRE-3846H)

Of these eligible resources, one consists of a historic district comprised of built environment resources (Fresno Nihonmachi District [SSJVIC Resource P-10-004294]. The other four eligible resources consist of one historic district comprised of archaeological resources (Town of Fresno District [SSJVIC Resource P-10-007206/CA-FRE-3920H]) and three historic-period archaeological resources (Chinese Shanty [HSR Resource FB-10-0149], Mattei Building Steam Tunnel [SSJVIC Resource P-10-007225], and Historic-Period Privy Pit [SSJVIC Resource P-10-007082/CA-FRE-3846H]). However, they do not qualify as unique archaeological resources.

A total of six resources within or adjacent/with the potential to extend into the project site have not been formally evaluated for listing in the NRHP or the CRHR. However, based on available data, there is evidence that they may be eligible under CRHR Criterion 1 (association with important events) and Criterion 4 (scientific data potential), and therefore may qualify as historical resources under CEQA. (However, they do not qualify as unique archaeological resources.) These resources include:

- Fresno Avenue and F Street (SSJVIC P-10-007224)
- Mariposa Street Boardwalk (HSR FB-10-0138)
- Inyo Street Boardwalk (HSR FB-10-0146/FB-10-0151)
- Central Fish Sidewalk (HSR APN 467-071-06)
- Historic-Period Trash Scatter (SSJVIC P-10-006144/CA-FRE-3618H)
- Historic-Period Refuse Deposit (SSJVIC P-10-006977/CA-FRE-3817H/HSR Resource FB-10-0501/APN 467-081-06)

Finally, of the resources within adjacent/with the potential to extend into the project site described above, one resource (represented by three numbers/names), referred to as the historic Fresno Chinatown District for the purposes of this project, is comprised of both built environment and archaeological resource components:

- Chinese American Community (SSJVIC P-10-004268)
- ARG Chinatown District
- HSR Chinatown District

These appear to describe the same overall district but have been subject to varying levels of documentation and evaluation. Chinese American Community (SSJVIC Resource P-10-004268) has not been evaluated for inclusion in the CRHR or NRHP, though two of its contributing buildings are individually listed on the BERD as eligible for the National Register. ARG Chinatown District was recommended as ineligible for inclusion in the CRHR or NRHP overall; however, it was suggested that a portion of the resource was eligible for local listing. HSR Chinatown remains unevaluated for the CRHR, NRHP and local listing. Although the resource records for Chinese American Community (SSJVIC Resource P-10-004268) and ARG Chinatown describe a built environment resource historic district, data gathered as a result of HSR Chinatown work suggests there is an archaeological component to the overall Fresno Chinatown District.

The project site is in an urban environment with little to no ground surface visible. Pedestrian survey of the project site did not identify any surface evidence of archaeological resources.

Additionally, Rincon contacted the NAHC on March 19, 2025, to request a search of the SLF. The NAHC responded on April 9, 2025, stating that the results of the SLF search were negative. The NAHC provided a list of 15 Native American contacts who may have knowledge of cultural resources of Native American origin within the area of potential effects. Potential project impacts to tribal cultural resources are discussed in Section 18, Tribal Cultural Resources.

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

Two historic built environment resources intersect the project site: the Fresno Nihonmachi District (SSJVIC Resource P-10-004294) and the Fresno Chinatown District (Chinese American Community [SSJVIC Resource P-10-004268], ARG Chinatown, and HSR Chinatown). The built environment components of these resources include historic-period buildings that contribute to the overall eligibility of each district. The project proposes the construction of underground water infrastructure beneath existing roadways and would not result in the direct physical demolition, destruction, relocation, or alteration of any of the district contributors nor would it result in indirect visual impacts to district contributors through the alteration of its immediate surroundings such that the significance of the districts would be materially impaired. The project does propose the use of

heavy equipment for the installation of the infrastructure which could result in vibratory impacts to nearby buildings that are contributors to these districts. However, with implementation of Mitigation Measure NOI-1 Construction Vibration Control Plan, impacts to built environment resources qualifying as historical resources related from vibration would be less than significant.

Significance After Mitigation

With implementation of Mitigation Measure NOI-1, project-related impacts to historical resources would be reduced to a less than significant level.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

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

Based on the archival review, archaeological resources have been shown in this area to have been capped and preserved under existing roadways and other development and the potential for intact historic-period archaeological deposits is high. The SLF search was negative and, although prehistoric archaeological resources may also be encountered, the likelihood is lower than the historic-period archaeological resources potential.

Of the 11 archaeological resources within or adjacent and/or have the potential to extend into the overall project site described above, four are identified as eligible for listing in the CRHR and/or NRHP and qualify as historical resources, including one historic district comprised of archaeological resources (Town of Fresno District [SSJVIC Resource P-10-007206/CA-FRE-3920H]) and three historic-period archaeological resources (Chinese Shanty [HSR Resource FB-10-0149], Mattei Building Steam Tunnel [SSJVIC Resource P-10-007225], and Historic-Period Privy Pit [SSJVIC Resource P-10-007082/CA-FRE-3846H]). Additionally, six resources have not been evaluated for listing in the NRHP or CRHR (Fresno Avenue and F Street [SSJVIC Resource P-10-007224], Mariposa Street Boardwalk [HSR Resource FB-10-0138], Inyo Street Boardwalk [HSR Resource FB-10-0146/FB-10-0151], Central Fish Sidewalk [HSR Resource APN 467-071-06], Historic-Period Trash Scatter [SSJVIC Resource P-10-006144/CA-FRE-3618H], and Historic-Period Refuse Deposit [SSJVIC Resource P-10-006977/CA-FRE-3817H/HSR Resource FB-10-0501/APN 467-081-06]); however, based on available data in the record, evidence exists that they are eligible for listing in the CRHR (and possibly the NRHP) under Criterion 1 (important events) and Criterion 4 (scientific data potential) and thus qualify as historical resources under CEQA. Finally, Fresno Chinatown District (Chinese American Community [SSJVIC Resource P-10-004268], ARG Chinatown, and HSR Chinatown), as mentioned earlier, is unevaluated overall though a small (built environment) portion of it was recommended eligible for the local register.

Two of the 11 archaeological resources are within (Chinese Shanty [HSR Resource FB-10-0149]) or immediately adjacent (Central Fish Sidewalk [HSR Resource APN 467-071-06]) to proposed project components and project implementation could result in direct physical demolition, destruction, relocation, or alteration of these resources. Treatment of these is required and, as such, Mitigation Measures CUL-1 through CUL-4 shall be implemented to reduce impacts to a less than significant level.

The remaining nine of the 11 archaeological resources qualifying as historical resources (HSR Chinatown District, Town of Fresno District [SSJVIC Resource P-10-007206/ CA-FRE-3920H], Fresno Avenue and F Street [SSJVIC Resource P-10-007224], Mattei Building Steam Tunnel [SSJVIC Resource P-10-007225], Mariposa Street Boardwalk [HSR Resource FB-10-0138], Inyo Street Boardwalk [HSR

Resource FB-10-0146 and FB-10-0151], Historic-Period Trash Scatter [SSJVIC Resource P-10-006144/CA-FRE-3618H], Historic-Period Refuse Deposit [SSJVIC Resource P-10-006977/CA-FRE-3817H [HSR Resource FB-10-0501/APN 467-081-06], and Historic-Period Privy Pit [SSJVIC Resource P-10-007082/CA-FRE-3846H]) are located adjacent and/or have the potential to extend into the overall project site. The majority of these are at sufficient distances away from the project site or in contexts where they are not anticipated to be impacted by project activities. However, the project site is known to be highly sensitive for archaeological resources that have been capped and preserved under existing roadways and other development and the potential to encounter undocumented segments of boardwalk, tunnels, and trolley tracks and other undocumented archaeological resources is high. Project implementation could result in direct physical demolition, destruction, relocation, or alteration of these nine identified archaeological resources and undocumented archaeological resources that may qualify as historical or unique archaeological resources. As such, Mitigation Measures CUL-1, CUL-3, and CUL-4 shall be implemented to reduce impacts to a less than significant level.

Mitigation Measures

CUL-1 Retention of a Qualified Archaeologist

Prior to the start of ground disturbing activities, an archaeologist meeting the Secretary of Interior's Professional Qualifications Standards (NPS 1983) (Qualified Archaeologist) shall be retained by the City to oversee all cultural resources work to be implemented in connection with the proposed project including the implementation of CUL-1–5.

CUL-2 Archaeological Resources Treatment Plan

Prior to the start of ground disturbing activities, the Qualified Archaeologist shall prepare and implement an Archaeological Resources Treatment Plan (ARTP) that reduces significant impacts to archaeological resources including FB-10-0149 (Chinese Shanty) and APN 467-071-06 (Central Fish Sidewalk). The ARTP shall include provisions for avoidance commensurate with Public Resources Code (PRC) Section 15126.4(b)(3)(A), data recovery to recover scientifically consequential information under CRHR Criterion 4 consistent with PRC Section 15126.4(b)(3)(C), and interpretation and education for important historical events under CRHR Criterion 1 consistent with City of Fresno General Plan Policies. The Data Recovery portion of the ARTP shall be prepared and implemented prior to the start of ground-disturbing activities in areas of the project site within 100 ft. of these resources. The Interpretation/Education portion of the ARTP shall be implemented within 180 days of completion of the Qualified Archaeologist's completed Data Recovery Report. The ARTP shall address each resources eligibility under CRHR Criterion 1 (important events) and Criterion 4 (scientific data potential). The ARTP shall include, but is not limited to, the following:

- **Avoidance.** Provisions for avoidance and preservation in place pursuant to PRC Section 15126.4(b)(3)(A) and consistent with City of Fresno General Plan Policies HCR-1 (maintain citywide preservation program to identify and protect cultural resources), HCR-2 (identify and preserve historic and cultural resources), and HCR-2-k (City-Owned Resources). Avoidance shall be the preferred manner of mitigating impacts to archaeological resources including planning to avoid archaeological resources, covering or capping archaeological resources, and/or deeding archaeological resources into permanent conservation easements.

- **Data Recovery.** In instances where avoidance and preservation in place is determined to be infeasible by the City, data recovery shall be implemented within portions of FB-10-0149 (Chinese Shanty) and APN 467-071-06 (Central Fish Sidewalk) within the construction disturbance footprint pursuant to PRC Section 15126.4(b)(3)(C) and consistent with City of Fresno General Plan Policies HCR-2 and HCR-2-a (identification and designation of historic properties), HCR-2-f (archaeological resources), and HCR-2-g (demolition review). Data recovery shall be designed to identify and adequately recover the scientifically consequential information from the archaeological site for which the site is eligible under CRHR Criterion 4. The ARTP shall include a Data Recovery Plan component that outlines archaeological methods for excavation, documentation, collection, laboratory analysis, special studies, reporting, and curation for each resource subject to data recovery.
- **Interpretation/Education.** Consistent with City of Fresno General Plan, interpretation and/or educational treatment shall be developed for FB-10-0149 (Chinese Shanty) and APN 467-071-06 (Central Fish Sidewalk) that seeks to enhance cultural awareness. Interpretive/educational treatments shall be designed to convey the historical characteristics from which the archaeological site derives its historical significance under CRHR Criterion 1. The ARTP shall include an Interpretation/Educational component that outlines methods consistent with the City of Fresno General Plan Policies HCR-2-i (preservation mitigation fund), HCR-2-n (property database and informational system), HCR-4-a (inter-agency collaboration), HCR-4-b (heritage tourism and public education), and HCR-4-d (public archives). Interpretive/educational treatments may include, but are not limited to, coordination with local historical societies and museums to develop educational displays, placement of interpretive signage and markers, preservation funding, and development and publishing of web content. The details of the Interpretive/Educational component of the ARTP may require refinement by the Qualified Archaeologist following data recovery implementation to account for specific materials recovered.

CUL-3 Cultural Resources Monitoring Plan

The Qualified Archaeologist shall prepare and implement a Cultural Resources Monitoring Plan (CRMP) that is designed to guide project-related archaeological monitoring activities and protection of archaeological resources during construction. The CRMP shall be prepared prior to the start of ground-disturbing activities. The purpose of the CRMP is to document the actions and procedures to be followed to ensure avoidance or minimization of impacts to archaeological resources consistent with *CEQA Guidelines* Section 15126.4(b) and consistent with City of Fresno General Plan Policies HCR-2 (identify and preserve historic and cultural resources), HCR-2-k (city-owned resources), and to outline a detailed program of mitigation for impacts on archaeological resources during project implementation. The CRMP shall include, but is not limited to, the following:

- **Worker Environmental Awareness Program.** The Qualified Archaeologist shall conduct a Worker Environmental Awareness Program training on archaeological sensitivity for all construction personnel prior to the commencement of any ground-disturbing activities. Archaeological sensitivity training shall include a description of the types of cultural material that may be encountered, cultural sensitivity issues, the regulatory environment, and the proper protocol for treatment of the materials in the event of an inadvertent discovery. Documentation of construction personnel training attendance shall be maintained by the City.

- **Scheduling and Discovery Communications.** Communications protocols between the City, construction contractor, and archaeological monitor shall include work schedule communications and discovery communications and notifications, as well as a contact list for project personnel and provisions for regular contact list updates.
- **Avoidance Delineation.** Specific procedures to ensure the establishment and avoidance of Environmentally Sensitive Areas, if any are identified prior to or during construction implementation.
- **Map Materials.** Preparation of maps generally delineating avoidance areas where ground-disturbing activities are not authorized to occur due to preservation in place or until data recovery implementation is completed as specified under CUL-2.
- **Inadvertent Discovery Provisions.** Prescribed actions to be taken in the event that archaeological resources are inadvertently discovered during ground-disturbing activities, including redirection of construction activities away from the discovery and immediate delineation of a temporary avoidance area, research design and significance evaluation, preparation of a California Department of Parks and Recreation 523 form, and if eligible for CRHR or local listing either individually or as a contributor to one or more of the identified historic districts and in the event avoidance is determined by the City to be infeasible, preparation of a resource-specific treatment and data recovery plan addressing the resources eligibility the criteria for which it is recommended eligible.
- **Reporting.** Reporting products shall be prepared by the Qualified Archaeologist following *Archaeological Resources Management Report* guidelines and shall be submitted to the CHRIS.
- **Native American Coordination.** Procedures outlining the City's initiation and coordination with Native American tribes in the event resources of Native American origin are identified during construction.
- **Human Remains.** Procedures for the appropriate treatment of human remains.

CUL-4 Archaeological Monitoring

Archaeological monitoring shall be conducted during all project-related, ground-disturbing activities for the purpose of identifying and avoiding impacts to archaeological resources and consistent with the monitoring provisions provided in the CRMP under CUL-3. Ground-disturbing activities include, but are not limited to, pavement and brush removal, trenching, excavation, grading, and drilling. Archaeological monitors shall have a BS or BA degree in Anthropology, Archaeology, or a related field, and at least one year's experience monitoring in California and shall work under the direct supervision of the Qualified Archaeologist. The number of archaeological monitors on-site at any given time will be dependent on the size of the areas in which work is occurring. Archaeological monitors shall be positioned in proximity to the work sufficient for adequate visibility of surface and subsurface conditions and to the extent safety factors allow. The Qualified Archaeologist shall have the authority to reduce or discontinue monitoring for areas observed to lack sensitivity and to determine the number of archaeological monitors required at any given time depending on work locations, in coordination with the City.

Significance After Mitigation

With implementation of Mitigation Measures CUL-1 through CUL-4, project-related impacts to archaeological resources would be reduced to a less than significant level.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

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

No human remains are known to be present within the project site. However, the discovery of human remains is always a possibility during ground disturbing activities, which would be required for the proposed project. In addition to being potential archaeological resources, human burials have specific provisions for treatment in PRC Section 5097. Additionally, California Health and Safety Code Sections 7050.5, 7051, and 7054 contain specific provisions for the protection of human burial remains. Existing regulations address the illegality of interfering with human burial remains and protects them from disturbance, vandalism, or destruction. PRC Section 5097.98 also addresses the disposition of Native American burials, protects such remains and establishes the NAHC as the entity to resolve any related disputes.

In the event human remains are inadvertently discovered during ground disturbing activities, the State of California Health and Safety Code Section 7050.5 states that no further disturbance will occur until the County Coroner has made a determination of origin and disposition pursuant to PRC Section 5097.98. In the event of an unanticipated discovery of human remains, the County Coroner must be notified immediately. If the human remains are determined to be of Native American origin, the Coroner will notify the NAHC, which will determine and notify a MLD. The MLD has 48 hours from being granted site access to make recommendations for the disposition of the remains. If the MLD does not make recommendations within 48 hours, the landowner will reinter the remains in an area of the property secure from subsequent disturbance.

Therefore, compliance with PRC Section 5097.98 and California Health and Safety Code Section 7050.5 would result in less than significant impacts to human remains.

LESS THAN SIGNIFICANT IMPACT

6 Energy

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

California is the fourth lowest per capita energy user in the United States, due to its energy efficiency programs and mild climate (United States Energy Information Administration [EIA] 2024). California consumed 281,140 gigawatt-hours of electricity in 2023 and 2,131 trillion British thermal units (BTU) of natural gas in 2022 (California Energy Commission [CEC] 2023, EIA 2024). The single largest end-use sector for energy consumption in California is transportation (42.6 percent), followed by industry (22.5 percent), residential (17.6 percent), and commercial (17.4 percent) (EIA 2024). Most of California's electricity is generated in-state with approximately 23 percent imported from the Northwest and Southwest in 2023 (CEC 2023). In addition, approximately 34 percent of California's electricity supply comes from renewable energy sources, such as wind, solar photovoltaic, geothermal, and biomass (CEC 2023). Senate Bill (SB) 100 accelerates the state's Renewable Portfolio Standards Program, codified in the Public Utilities Act, by requiring electricity providers to increase procurement from eligible renewable energy resources to 33 percent of total retail sales by 2020, 60 percent by 2030, and 100 percent by 2045.

To reduce statewide vehicle emissions, California requires all motorists use California Reformulated Gasoline, which is sourced almost exclusively from in-state refineries. Gasoline is the most used transportation fuel in California with 13.6 billion gallons sold in 2023; it is used by light-duty cars, pickup trucks, and sport utility vehicles (CEC 2024). Diesel is the second most used fuel in California with two billion gallons sold in 2023; it is used primarily by heavy duty-trucks, delivery vehicles, buses, trains, ships, boats and barges, farm equipment, and heavy-duty construction and military vehicles (CEC 2024). Both gasoline and diesel are primarily petroleum-based, and their consumption releases greenhouse gas (GHG) emissions, including CO_2 and NO_X. The transportation sector is the single largest source of GHG emissions in California, accounting for 39 percent of all inventoried emissions in 2022 (CARB 2024).

Pacific Gas and Electric (PG&E) is the primary provider of energy (electricity and natural gas services) for the city. According to the Fresno General Plan Master Environmental Impact Report (MEIR), based on the electrical demand factors provided by PG&E, the total electrical demand for the City is approximately 2,992 million kWh per year. Total natural gas demand is approximately 159 million therms/year and the total yearly consumption for vehicle fuels is approximately 184 million gallons/year based on an average of 18.2 miles per gallon.

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

Energy use during construction of the project would be primarily in the form of fuel consumption to operate heavy equipment, light-duty vehicles, machinery, and generators. Temporary grid power may also be provided to construction trailers or electric construction equipment. Energy use during construction would be temporary in nature, and construction equipment used would be typical of construction projects in the region including heavy machinery such as graders, excavators, loaders, asphalt pavers, and backhoes. During construction, the energy used would be minimal as this activity is temporary, which would result in minimal energy consumption. Therefore, project construction would not result in a potential impact due to wasteful, inefficient, or unnecessary consumption of energy resources, and the impact would be less than significant.

During the operational phase, the project would not require significant energy use as no public facilities or building structures are proposed. Minor operational vehicle trips associated with maintenance of the pipelines and manholes may occur, but as discussed previously, the number of operational vehicle trips would be minor and would not generate new worker trips beyond what is already required for existing pipeline maintenance. As such, the project would have no impact on operational energy use.

LESS THAN SIGNIFICANT IMPACT

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

SB 100 mandates 100 percent clean electricity for California by 2045. Because the proposed project's electric needs would be powered by the existing electricity grid, the project would eventually be powered by renewable energy mandated by SB 100 and would not conflict with this statewide plan. The City of Fresno does not have any specific renewable energy or energy efficiency plans with which the project could comply. Nonetheless, the project would not conflict with or obstruct the state plan for renewable energy. No impact would occur.

NO IMPACT

7 Geology and Soils

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than - Significant Impact	No Impact
Would the project:				
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
1. 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?	☐	☐	■	☐
2. Strong seismic ground shaking?	☐	☐	■	☐
3. Seismic-related ground failure, including liquefaction?	☐	☐	☐	■
4. 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 geologic feature?	☐	■	☐	☐

a.1. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

a.2. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?

The project site is not located in an Alquist-Priolo Fault Zone and the nearest Alquist-Priolo Fault Zone is the Ortigalita Fault Zone located approximately 52 miles west of the project site (California Geological Survey [CGS] 2025). Although the project site is not located near an Alquist-Priolo Fault Zone, a high-magnitude earthquake on the Ortigalita Fault Zone or other regional faults could cause moderate ground shaking at the project site (Fresno County 2018). Due to distance between the project site and the nearest fault zone, the project site is not at risk of fault rupture.

The proposed project involves the installation, replacement, and rehabilitation of existing underground water and sewer pipelines and manholes, along with abandonment of existing pipelines, and would not involve any habitable structures. Design and construction of the proposed project would consider the seismic environment and would comply with applicable seismic design standards. A large seismic event, such as a fault rupture or seismic ground shaking, could result in breakage of the proposed water or sewer pipes, failure of joints, and/or underground leakage from the pipelines. In the event an earthquake compromised any project component during operation, the City would temporarily shut off the facility and conduct emergency repairs as soon as possible. Therefore, the project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving fault rupture and strong seismic ground shaking. The impact would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

a.3. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?

Liquefaction occurs when the strength and stiffness of a soil is reduced by intense ground shaking typically associated with an earthquake in areas with a high groundwater table. The project site is not located in a liquefaction zone designated by CGS and the nearest designated liquefaction zone is located approximately 105 miles northwest of the project site (CGS 2025). The project would not include habitable structures and would therefore would not expose people to loss, injury, or death involving liquefaction. Additionally, implementation of the project would not exacerbate the existing risk of earthquake-induced liquefaction in the immediate vicinity. There would be no impact.

NO IMPACT

a.4. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?

The project site and its surrounding areas are relatively flat and are not adjacent to steep slopes. The project site is not located in a landslide zone designated by CGS and the nearest designated landslide zone is located approximately 97 miles northwest of the project site (CGS 2025). The project would not include habitable structures and would therefore would not expose people to loss, injury, or death involving liquefaction. Additionally, implementation of the project would not

exacerbate the existing risk of earthquake-induced landslides in the immediate vicinity. There would be no impact.

NO IMPACT

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

Soil erosion or the loss of topsoil may occur when soils are disturbed but not secured or restored, such that wind or rain events may mobilize disturbed soils, resulting in their transport off the project sites. Construction activities would include grading and excavation, which could potentially result in erosion.

Construction activities would be subject to the National Pollutant Discharge Elimination System (NPDES) Construction General Permit. The Construction General Permit requires implementation of a Stormwater Pollution Prevention Plan (SWPPP) that outlines project-specific BMPs for stormwater control, including BMPs to control erosion. Such BMPs include the use of temporary de-silting basins, installation of silt fences and erosion control blankets, and use of tarps on stockpiled soil.

As discussed in Section 10, *Hydrology and Water Quality*, compliance with the NPDES Construction General Permit would reduce potential impacts associated with construction-related soil erosion to a less-than-significant level. The proposed project would not expand impervious surfaces within the project site. Upon completion of construction, operation and maintenance activities would return to existing conditions. As such, operation of the project would not increase soil erosion or the loss of topsoil on the project site. Potential impacts to soil erosion and the loss of topsoil would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

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?

As detailed under thresholds a.3 and a.4, the proposed project is not located in an area that would become unstable as a result of the proposed project. The proposed project activities would occur within the previously disturbed public rights-of-way. The design and construction of the proposed project would comply with applicable seismic design. Therefore, the project would not increase the potential for local or regional landslides, liquefaction, lateral spreading, or collapse.

Subsidence occurs when a large portion of the land is displaced vertically, usually due to the withdrawal of groundwater, oil, or natural gas. According to the United States Geological Survey (USGS), the project site is not within an area that is likely to experience soil subsidence (USGS 2025). Therefore, the project would not increase the potential for on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. There would be no impact.

NO IMPACT

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?

Expansive soils are soils that are high in clays or silts and swell and shrink with wetting and drying, respectively. This shrinking and swelling can result in differential ground movement, which can cause damage to foundations. The exact mix of soils on the project site is unknown at this time and expansive soils may occur. However, the proposed project does not involve construction of

foundations or aboveground structures and therefore would not be subject to damage from expansive soils. Additionally, groundwater occurs at depths well below project excavation, and precipitation typically does not infiltrate pipe zones because they are located beneath impermeable surfaces (e.g., roads) that convey runoff to storm basins. Therefore, impacts related to expansive soils would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

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?

The proposed project would not include the use of septic tanks or alternative wastewater disposal systems. No impact would occur.

NO IMPACT

f. Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Paleontological resources are not known to be present on the site. However, since excavation is required, unanticipated paleontological resources could be discovered during project construction. Impacts on previously unidentified paleontological resources would be potentially significant.

Mitigation Measure

With implementation of Mitigation Measure GEO-1, impacts pertaining to the potential discovery of paleontological resources would be less than significant, as all work would be temporarily halted, and adherence of to all federal, state, and local guidelines would be followed.

GEO-1 Unanticipated Discovery of Paleontological Resources

If paleontological resources are discovered during excavation, grading, or construction, the construction manager shall immediately contact the City's Planning and Development Department, and all work shall cease in the area of the find until a qualified paleontologist evaluates the find. Work shall not resume until authorized by the Planning Manager and the qualified paleontologist. The paleontologist shall determine the location, the time frame, and the extent to which any monitoring of earthmoving activities shall be required. Found deposits shall be treated in accordance with federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2.

In the event an unanticipated fossil discovery is made during the course of project development, then in accordance with SVP (2010) guidelines, it is the responsibility of any worker who observes fossils within the project site to stop work in the immediate vicinity of the find and notify a qualified professional paleontologist who shall be retained to evaluate the discovery, determine its significance and if additional mitigation or treatment is warranted. Work within 100 feet of the discovery will resume once the find is properly documented and authorization is given to resume construction work. Any significant paleontological resources found during construction monitoring will be prepared, identified, analyzed, and permanently curated in an approved regional museum repository.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

8 Greenhouse Gas Emissions

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than - Significant Impact	No Impact
Would the project:				
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?	☐	☐	■	☐

Climate Change Background

Climate change is the observed increase in the average temperature of the Earth's atmosphere and oceans along with other substantial changes in climate (such as wind patterns, precipitation, and storms) over an extended period of time. Climate change is the result of numerous, cumulative sources of greenhouse gas (GHG) emissions contributing to the "greenhouse effect," a natural occurrence which takes place in Earth's atmosphere and helps regulate the temperature of the planet. The majority of radiation from the sun hits Earth's surface and warms it. The surface, in turn, radiates heat back towards the atmosphere in the form of infrared radiation. Gases and clouds in the atmosphere trap and prevent some of this heat from escaping into space and re-radiate it in all directions.

GHG emissions occur both naturally and from human activities, such as burning of fossil fuels, decomposition of landfill wastes, raising of livestock, deforestation, and some agricultural practices. GHGs produced by human activities include carbon dioxide (CO_2), methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. Different types of GHGs have varying global warming potentials (GWP). The GWP of a GHG is the potential of a gas or aerosol to trap heat in the atmosphere over a specified timescale (generally, 100 years). Because GHGs absorb different amounts of heat, a common reference gas (CO_2) is used to relate the amount of heat absorbed to the amount of the gas emitted, referred to as "carbon dioxide equivalent" (CO_2e), which is the amount of a specific GHG emitted multiplied by its GWP. Carbon dioxide has a 100-year GWP of one. By contrast, methane has a GWP of 30, meaning its global warming effect is 30 times greater than CO_2 on a molecule-per-molecule basis (Intergovernmental Panel on Climate Change [IPCC] 2021).

The United Nations IPCC expressed that the rise and continued growth of atmospheric CO_2 concentrations is unequivocally due to human activities in the IPCC's Sixth Assessment Report (2021). Human influence has warmed the atmosphere, ocean, and land, which has led the climate to warm at an unprecedented rate in the last 2,000 years. It is estimated that between the period of 1850 through 2019, a total of 2,390 gigatons of anthropogenic CO_2 was emitted. It is likely that anthropogenic activities have increased the global surface temperature by approximately 1.07

degrees Celsius between the years 2010 through 2019 (IPCC 2021). Emissions resulting from human activities are thereby contributing to an average increase in Earth's temperature. Potential climate change impacts in California may include loss of snowpack, sea level rise, more extreme heat days per year, more high ozone days, more large forest fires, and more drought years (California Natural Resource Agency 2018).

Regulatory Framework

Federal Regulations

The U.S. Supreme Court in *Massachusetts et al. v. Environmental Protection Agency et al*. ([2007] 549 U.S. 05-1120) held that the U.S. EPA has the authority to regulate motor-vehicle GHG emissions under the federal Clean Air Act. The U.S. EPA issued a Final Rule for mandatory reporting of GHG emissions in October 2009. This Final Rule applies to fossil fuel suppliers, industrial gas suppliers, direct GHG emitters, and manufacturers of heavy-duty and off-road vehicles and vehicle engines and requires annual reporting of emissions. In 2012 the U.S. EPA issued a Final Rule that establishes the GHG permitting thresholds that determine when Clean Air Act permits under the New Source Review Prevention of Significant Deterioration (PSD) and Title V Operating Permit programs are required for new and existing industrial facilities.

In 2014, the U.S. Supreme Court in *Utility Air Regulatory Group v. EPA* (134 S. Ct. 2427 [2014]) held that U.S. EPA may not treat GHGs as an air pollutant for purposes of determining whether a source is a major source required to obtain a PSD or Title V permit. The Court also held that PSD permits that are otherwise required (based on emissions of other pollutants) may continue to require limitations on GHG emissions based on the application of Best Available Control Technology (BACT).

California Regulations

California Air Resources Board (CARB) is responsible for the coordination and oversight of State and local air pollution control programs in California. California has numerous regulations aimed at reducing the state's GHG emissions. These initiatives are summarized below.

ASSEMBLY BILL 32

California's major initiative for reducing GHG emissions is outlined in Assembly Bill 32 (AB 32), the "California Global Warming Solutions Act of 2006," signed into law in 2006. AB 32 codifies the statewide goal of reducing GHG emissions to 1990 levels by 2020, and requires CARB to prepare a Scoping Plan that outlines the main State strategies for reducing GHGs to meet the 2020 deadline. Based on this guidance, CARB approved a 1990 statewide GHG level and 2020 limit of 427 MMT CO_2e. The Scoping Plan was approved by CARB on December 11, 2008, and included measures to address GHG emission reduction strategies related to energy efficiency, water use, and recycling and solid waste, among other measures.

In May 2014, CARB approved the first update to the AB 32 Scoping Plan. The 2013 Scoping Plan update defines CARB's climate change priorities for the next five years and sets the groundwork to reach post-2020 statewide goals.

SENATE BILL 32

On September 8, 2016, the governor signed Senate Bill 32 (SB 32) into law, extending AB 32 by requiring the State to further reduce GHGs to 40 percent below 1990 levels by 2030 (the other

provisions of AB 32 remain unchanged). On December 14, 2017, CARB adopted the 2017 Scoping Plan, which provides a framework for achieving the 2030 GHG target. As with the 2013 Scoping Plan Update, the 2017 Scoping Plan does not provide project-level thresholds for land use development. Instead, it recommends that local governments adopt policies and locally-appropriate quantitative thresholds consistent with a statewide per capita goal of six metric tons (MT) CO_2e by 2030 and two MT CO_2e by 2050 (CARB 2017). As stated in the 2017 Scoping Plan, these goals may be appropriate for plan-level analyses (city, county, subregional, or regional level), but not for specific individual projects because they include all emissions sectors in the State (CARB 2017).

ASSEMBLY BILL 1279

The Scoping Plan was updated in 2022. The 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan) lays out a path to achieve targets for carbon neutrality and reduce anthropogenic greenhouse gas (GHG) emissions by 85 percent below 1990 levels no later than 2045, as directed by AB 1279. The actions and outcomes in the 2022 Scoping Plan will achieve substantial reductions in fossil fuel combustion by adopting cleaner technologies and fuels, support sustainable development, increased action on open space and working lands to reduce emissions and sequester carbon, and the capture and storage of carbon long term (CARB 2022).

SENATE BILL 97

Senate Bill (SB) 97, signed in August 2007, acknowledges that climate change is an environmental issue that requires analysis in California Environmental Quality Act (CEQA) documents. In March 2010, the California Resources Agency (Resources Agency) adopted amendments to the State CEQA Guidelines for the feasible mitigation of GHG emissions or the effects of GHG emissions. The adopted guidelines give lead agencies the discretion to set quantitative or qualitative thresholds for the assessment and mitigation of GHG and climate change impacts.

SENATE BILL 375

SB 375, signed in August 2008, enhances the state's ability to reach AB 32 goals by directing CARB to develop regional GHG emission reduction targets to be achieved from passenger vehicles by 2020 and 2035. In addition, SB 375 directs each of the state's 18 major Metropolitan Planning Organizations (MPOs) to prepare a "sustainable communities strategy" (SCS) that contains a growth strategy to meet these emission targets for inclusion in the Regional Transportation Plan (RTP). On March 22, 2018, CARB adopted updated regional targets for reducing GHG emissions from 2005 levels by 2020 and 2035.

SENATE BILL 100

Adopted on September 10, 2018, SB 100 supports the reduction of GHG emissions from the electricity sector by accelerating the state's Renewables Portfolio Standard Program, which was last updated by SB X 1-2 in 2011. SB 100 requires electricity providers to increase procurement from eligible renewable energy resources to 33 percent of total retail sales by 2020, 60 percent by 2030, and 100 percent by 2045.

EXECUTIVE ORDER B-55-18

On September 10, 2018, the governor issued Executive Oder B-55-18, which established a new statewide goal of achieving carbon neutrality by 2045 and maintaining net negative emissions thereafter. This goal is in addition to the existing statewide GHG reduction targets established by SB 375, SB 32, SB 1383, and SB 100.

Local Regulations

FRESNO COUNCIL OF GOVERNMENTS FRESNO COUNTY 2022 REGIONAL TRANSPORTATION PLAN/SUSTAINABLE COMMUNITIES STRATEGY

The Final 2022 Regional Transportation Plan for Fresno County (RTP) adopted by Fresno COG meets Senate Bill 375 requirements to prepare a Sustainable Communities Strategy (SCS). The SCS includes various strategies, such as alternative modes of transportation and building electrification, as key elements to reduce GHGs, reduce roadway congestion and energy use, increase the health and quality of life of residents. The 2022 RTP/SCS is an update of the 2018 RTP/SCS, which expired in December 2022. The 2022 RTP/SCS is similar to the 2018 RTP/SCS in that it includes the Sustainable Communities Strategy as required by Senate Bill 375 – the Sustainable Communities and Climate Protection Act of 2008 and also contains updates to planned improvement projects (FCOG 2022).

CITY OF FRESNO GREENHOUSE GAS REDUCTION PLAN

The Fresno General Plan and Master EIR (MEIR) State Clearinghouse (SCH) #: 2012111015 discusses implementation of the city's Greenhouse Gas Reduction Plan (GGRP), which can be found in Appendix F of the city's General Master Plan. The GHG Plan focuses on emissions generated by activities under the control or influence of the City. The GHG Plan is designed to ensure that the development accommodated by the buildout of the Fresno General Plan supports the goals of AB 32. This GGRP would reduce community-related and City operations-related greenhouse gas emissions to a degree that would not hinder or delay implementation of AB 32.

The 2014 GGRP was adopted prior to the signing of SB 32. Therefore, the 2014 GGRP is not considered "qualified" to determine the significance of a project, according to *CEQA Guidelines* Section 15183.5, as it does not align with the current state targets. Although the Fresno 2014 GGRP is not "qualified" under CEQA, the included GHG reduction strategies are intended to reduce overall GHG emissions, consistent with the Fresno General Plan.

The City of Fresno updated its 2014 GGRP in 2021 to conform with existing applicable State climate change policies and regulations, including SB 32. The GGRP 2021 Update outlines strategies that the City will pursue to achieve its GHG emission reduction goals, and includes a GHG Reduction Plan Update Consistency Checklist (Checklist), with the purpose to help the City provide a streamlined review process for new development projects that are subject to discretionary review pursuant to the California Environmental Quality Act (CEQA) Guidelines Section 15183.5.

Methodology and Significance Thresholds

Methodology

GHG EMISSIONS

Criteria pollutant emissions are reported as the maximum daily emissions. The analysis focuses on CO_2, CH_4, and N_2O because these represent most of the project's GHG emissions, which would result from operation of construction equipment and associated vehicle trips. The remaining GHG pollutants are associated with industrial processes and, as a water and sewer improvement project, the potential for such emissions from the project would be minimal.

DETERMINING EMISSIONS

CalEEMod version 2022.1.1.29 was used to estimate construction emissions for the proposed project, using the same assumptions as described in Section 3, *Air Quality*. Operational GHG emissions associated with existing maintenance activities are negligible and therefore not estimated in this analysis.

SIGNIFICANCE THRESHOLDS

Neither the SJVAPCD, Fresno COG, nor the City of Fresno have adopted an evidence-based numeric threshold consistent with the 2022 Scoping Plan and the state's long-term GHG reduction goals.

Since the SJVAPCD and the City of Fresno do not have established GHG significance thresholds, the project is evaluated based on its alignment with the latest adopted Scoping Plan from CARB, including its adherence to relevant measures outlined in the Plan, as well as the most recent RTP/SCS for the region. Notably, the Scoping Plan aligns with AB 1279's GHG reduction targets, aiming for carbon neutrality by 2045 and a reduction of anthropogenic emissions to 85 percent below 1990 levels by 2045. As such, consistency with CARB's Scoping Plan would also demonstrate alignment with the carbon neutrality requirements of AB 1279. This analysis offers a qualitative evaluation of the project's compliance with applicable plans, policies, and regulations designed to reduce GHG emissions, in order to assess whether the project would have a significant environmental impact related to GHGs. The estimated GHG emissions from construction and operation are provided for informational purposes.

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

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

Project consistency with the 2022 Scoping Plan, FCOG RTP/SCS and, and the City of Fresno General Plan is evaluated below.

2022 Climate Change Scoping Plan

The project's consistency with the 2022 Scoping Plan is discussed below. As shown therein, the project is consistent with the Priority GHG Reduction Strategies outlined in Appendix D of the Scoping Plan which provide three priority areas to assist jurisdictions with developing local climate action plans: Transportation Electrification, VMT Reduction, and Building Decarbonization. As the proposed project is a water and sewer improvement project, reduction measures associated with Transportation Electrification and Building Decarbonization are not applicable. However, two measures under the VMT Reduction priority area are applicable:

- Amend zoning or development codes to enable mixed-use, walkable, transit-oriented, and compact infill development (such as increasing the allowable density of a neighborhood)
- Preserve natural and working lands by implementing land use policies that guide development toward infill areas and do not convert "greenfield" land to urban uses (e.g., green belts, strategic conservation easements)

The proposed project is located in Downtown Fresno, an area identified by the City as a priority for infill infrastructure. Specifically, the City has secured funding through the California Housing and Community Development Infill Infrastructure Grant Catalytic Qualifying Infill Area Program (IIGC

Grant) for the proposed project, in which the primary use of the IIGC Grant funds are intended to fund at least seven projects related to upgrading water and sewer infrastructure within the Downtown Fresno triangle. As the project is proposed within an infill development area, the project is consistent with these two local strategies aimed at increasing high-density, infill development. Therefore, the project is consistent with the 2022 Scoping Plan.

2022 FCOG RTP/SCS

The FCOG 2022 RTP/SCS outlines a set of regional goals aimed at reducing GHG emissions through land use consistency and the reduction of vehicle trips by promoting intermodal transportation systems. Most of these goals and policies are implemented at the regional or city level. Since the proposed project is an infill development (located within city limits and surrounded by existing development), will not generate additional vehicle trips during operation, and would comply with local regulations, the project would generally align with the goals and policies outlined in the RTP/SCS.

City of Fresno General Plan

The City of Fresno General Plan includes various policies aimed at reducing air emissions, with all air quality and greenhouse gas emissions policies implemented at the city level. Since the project is an infill project aimed at improving the water and sewer infrastructure of Downtown Fresno, adheres to local regulations, and does not propose a use that would generate excessive GHG emissions, it is generally consistent with the General Plan.

In conclusion, the project incorporates features that reduce GHG emissions in alignment with the CARB 2022 Climate Change Scoping Plan, FCOG RTP/SCS, and the City of Fresno General Plan. As a result, the project would not conflict with any relevant plan, policy, or regulation designed to reduce GHG emissions, and thus, the impact would be less than significant.

GHG Emissions for Informational Purposes

Construction

The proposed project has the potential to generate GHG emissions during construction from operation of heavy construction equipment and truck and vehicle trips. GHG emissions from construction of the project were estimated using CalEEMod, Version 2022. 1.1.29 and use the same assumptions as the air quality analysis, as presented in Section 3, *Air Quality*. Modeling results are provided in Appendix A. Construction of the proposed project would generate of a total of approximately 1,284 MT CO_2e over the approximately 18-month construction period, as shown in Table 5.

Table 5 Combined Annual Emissions of Greenhouse Gases

Emission Source	Annual Emissions (CO_2e in metric tons)
Construction	1,284
2026	1,149
2027	135
Total (Amortized over 30 years)	**43**

See Appendix A for CalEEMod worksheets and calculations.

Operation of the proposed project would not generate new GHG emissions. No new or expanded parking or building facilities would be developed as a part of this water and sewer improvement project; thus, no net increase in vehicle trips to and from the pipeline once operational is anticipated other than those vehicle trips already required for pipeline maintenance.

In conclusion, the project would result in a temporary one-time contribution of 1,284 MT CO_2e during construction, or 43 MT CO_2e per year when averaged over the lifetime of the project.

As described above, the project would align with the relevant goals and policies aimed at reducing GHG emissions, including CARB's 2022 Scoping Plan, SJVAPCD guidelines, and the City of Fresno General Plan goals and policies designed to reduce air emissions and improve air quality, which in turn reduces GHG emissions. These emissions would not make a significant contribution to global climate change throughout the lifespan of the proposed project. Therefore, it can be concluded that the project would not be of a scale or scope that would substantially or cumulatively contribute to GHG emissions, and as such, impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

This page left intentionally blank.

9 Hazards and Hazardous Materials

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than - Significant Impact	No Impact
Would the project:				
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 0.25 mile of an existing or proposed school?	☐	☐	■	☐
d. Be located on a site that is included on a list of hazardous material 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 in 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?	☐	☐	■	☐

The project site is located within public roadway rights-of-way within the urban Downtown area of the City.

Potential Regional Hazards

There are no oil and gas wells located along the project site or within 1,000 feet of the project site (California Geologic Energy Management Division 2025). One hazardous liquid pipeline is located within 1,000 feet of the project site, along the railroad right-of-way between G Street and H Street (USDOT 2025). There are no current landfills located within 1,000 feet of the project site (CalRecycle 2025). There are no current landfill, airport, chrome plating, publicly owned treatment works, Department of Defense, or bulk fuel storage terminal/refinery sites with per- and polyfluoroalkyl substances (PFAS) orders located within 1,000 feet of the project site (SWRCB 2025c).

Historical Land Use Review

A review of historical aerial photographs and topographic maps available online indicates that the project site has been developed since approximately 1923. Historical land use was similar to present, consisting primarily of commercial and industrial properties along the project site. However, some areas northeast and southwest of State Route 99 were residential until approximately 1972. State Route 99 was established by approximately 1964 and State Route 41 was established in its current configuration by approximately 1998. Railroad tracks are present between the southern and northern portions of the project site, between G Street and H Street (Nationwide Environmental Title Research, LLC 2025).

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?

Construction of the proposed project would temporarily increase the transport and use of hazardous materials in the project area through the operation of vehicles and equipment and the use of hazardous materials to re-line pipes. Such substances include diesel fuel, oil, solvents, epoxy resin, trowel grade epoxy, and other similar materials brought onto the construction site for use and storage during the construction period. These materials would be contained within vessels specifically engineered for safe storage and would not be transported, stored, or used in quantities that would pose a significant hazard to the public or construction workers themselves. Project construction activities would adhere with all relevant regulations, including the enforcement of hazardous materials transportation regulations. Additionally, the applicant would acquire a waste management plan (WMP) for construction and demolition debris, as required by the City, which would ensure hazardous waste discovered during construction activities would be properly disposed of. Compliance with these regulations and the City's standard construction practices would ensure that potential hazardous materials impacts from construction activities would be less than significant.

The project would not operate and maintain the storage of hazardous materials or hazardous waste on site. Therefore, there would be no impact related to hazardous materials during project operation.

Project construction and operation would not create a significant hazard through the routine transport, use, or disposal of hazardous materials or through upset and accident conditions involving the release of hazardous materials. The impact would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

c. Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?

The nearest school to the project site is Kepler Neighborhood School, which is located approximately 200 feet northwest of sewer pipe replacement, sewer manhole replacement, and sewer manhole rehabilitation activities near the intersection of Tuolumne Street and Broadway Street. Other schools within 0.25 mile of the project site include Lincoln Elementary located approximately 0.23 mile southwest of water pipe replacement and sewer manhole replacement activities near the intersection of F Street and Cesar Chavez Boulevard, and Kirk Elementary located approximately 0.23 mile west of sewer pipe rehabilitation and sewer manhole rehabilitation activities near the intersection of Belgravia Avenue and Cherry Avenue.

Construction could involve both the use and transport of both hazardous materials and hazardous wastes and would be required to be managed by BMPs. The use of common construction hazardous materials and wastes in quantities needed for a development of this size would not be expected to present hazards to the school. The use of such materials would present a potential impact were they to be transported near the elementary school; however, licensed hazardous materials transporters leaving the project site would take the shortest direct route. Therefore, it is unlikely transporters would be required to drive past the school while carrying hazardous materials. Further, as described under thresholds a and b, construction of the proposed project would comply with existing federal and State requirements for the transport, use, or disposal of hazardous materials and hazardous waste. No facilities or infrastructure expected to contain lead-based paint or asbestos-containing materials would be demolished as part of project construction. Therefore, project construction would not emit hazardous emissions or handle hazardous materials, substances, or waste within 0.25-mile of an existing or proposed school. The impact would be less than significant.

Operation of the project would not involve use, transport, or storage of hazardous materials or hazardous waste which could impact nearby schools. Therefore, project operation would not emit hazardous emissions or handle hazardous materials, substances, or waste within 0.25-mile of an existing or proposed school. The impact would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

d. Would the project be located on a site that is included on a list of hazardous material 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?

The project site is located within public roadway rights-of-way within the urban Downtown area of the City. No hazardous material release sites are located within the project site (SWRCB 2025a).

Hazardous Material Release Case Listings

The following databases, compiled pursuant to Government Code Section 65962.5, were reviewed in April 2025 for known hazardous materials contamination at the project site:

- State Water Resources Control Board's (SWRCB) GeoTracker database (SWRCB 2025a)
- SWRCB's list of solid waste disposal sites with waste constituents above hazardous waste levels outside the waste management unit (SWRCB 2025b)
- California Department of Toxic Substances Control's (DTSC) EnviroStor database (DTSC 2025)
- Superfund Enterprise Management System (SEMS) database (USEPA 2025)
- CalEPA Active Cease and Desist Orders (CDOs) and Cleanup Abatement Orders (CAOs) (CalEPA 2025a)
- List of hazardous waste facilities subject to corrective action pursuant to Section 25187.5 of the Health and Safety Code (CalEPA 2025b)

According to SWRCB's GeoTracker database and DTSC EnviroStor database, the project site is not associated with hazardous material release cases (SWRCB 2025a; DTSC 2025). The project site is not listed in any other Cortese List data resources available via CalEPA (CalEPA 2025) or in the USEPA's Superfund Enterprise Management System (SEMS)/ Envirofacts database (USEPA 2025). There are no Brownfields, SEMS, or Toxics Release Inventory hazardous materials/wastes sites within 1,000 feet of the project site (USEPA 2025).

The nearest SWRCB hazardous material release sites to the southern portion of the project site along Cherry Avenue, State Route 99, and Monterey Street include two leaking underground storage tank (LUST) sites involving releases of petroleum hydrocarbons to soil and/or groundwater, located at 2320 Church Avenue and 2440 Church Avenue (Roadway Express, Inc); both located adjacent to the south of the project site section along Church Avenue. Additionally, there is one SWRCB Cleanup Program Site involving releases of metals and petroleum hydrocarbons to soil and/or groundwater at 2449 South Cherry Avenue, to the east of the portion project site section along South Cherry Avenue. However, the two LUST cases were closed in 1999 and the SWRCB Cleanup Program Site was closed in 1965 (SWRCB 2025a). No excavation or ground-disturbing activities are proposed near this site.

The nearest SWRCB hazardous material release sites to the northwestern portion of the project site along F Street and G Street include three LUST sites involving releases of petroleum hydrocarbons to soil and/or groundwater, located at 1626 Tulare Street (Del Monte Foods Parking Lot), located adjacent to the east of the project site section along G Street; 804 F Street (Felix Auto Mechanic), located east of the section of the project site along F Street; and 620 F Street (Blues Auto), located east of the section of the project site along F Street. However, all three LUST cases were closed in 1996, 2001, and 2003, respectively (SWRCB 2025a). No excavation or construction activities are proposed in near this site.

The nearest SWRCB sites to the northeastern portion of the project site along H Street, Tulare Street, Van Ness Avenue, and Tuolumne Street include three LUST sites involving releases of petroleum hydrocarbons to soil and/or groundwater, located at 1560 H Street (Quinn Company Vacant Lot), located north of Stanislaus Street and adjacent to the east of the project site section along H Street; 1506 Van Ness Avenue (Chevron #9-0909), located adjacent to the north of the northernmost project site section along Van Ness Avenue; and 1033 Broadway Street (Greyhound Bus Depot), located at the corner of Tulare Street and H Street along the project site. However, all three LUST cases were closed in 1991, 1992, and 2013, respectively (SWRCB 2025a). No excavation or construction activities are proposed in this portion of the project site.

The nearest active hazardous material release site listed by the SWRCB is the former Lamoure's Cleaners at 1304 G Street, approximately 485 feet east of the section of the project site along F Street (SWRCB 2025a). The former Lamoure's Cleaners site is classified as a Cleanup Program Site for volatile organic compounds with an "open" case status as of 2021. The nearest DTSC Site Cleanup Program case is at the former Fresno 2 Manufactured Gas Plant site, located along Mariposa Street between F and G Street, adjacent to the east of the project site section along F Street (DTSC 2025). The Fresno 2 Manufactured Gas Plant site is associated with petroleum hydrocarbon, cyanide, metals, and polynuclear aromatic hydrocarbon impacts to soil and soil vapor and has a "certified operations and maintenance" case status with a land use restriction as of 2025. No excavation or construction activities are proposed near the active hazardous material release site.

Therefore, the project is not included on existing lists of hazardous materials sites compiled pursuant to Government Code Section 65962.5.

Project Impacts

While there is no evidence of impacted soil at the project site, there is a potential for excavation, grading, and construction workers to be exposed to contaminants via impacted dust and/or soil related to hazardous material releases sites adjacent to the project site, as these sites are either actively undergoing assessment and/or remediation, or may have been closed with residual contamination left in place. Additionally, if off-site disposal of soils from the project site would occur during project construction, the soil may require special handling or disposal as a waste.

Consequently, the unknown existing conditions at the project site could result in a potentially significant hazard to the public or the environment during grading/construction at the project alignment. Implementation of Mitigation Measure HAZ-1, discussed below, would reduce the potential construction impacts related to unknown hazardous substance releases to a less-than-significant level.

The risk of hazardous materials creating a significant hazard to the public or the environment would primarily occur during construction of the project as on-site contamination is disturbed. Once the project is operational, the contaminated media would mostly be removed or covered and would no longer pose a risk. Therefore, there would be no operational impact.

Mitigation Measures

HAZ-1 Soil Management Plan

Prior to commencement of construction and grading activities at the project site, the project contractor shall retain a qualified environmental consultant (Professional Geologist or Professional Engineer) to prepare a Soil Management Plan (SMP) for the project site. The SMP shall address:

1. On-site handling and management of impacted soils or other impacted wastes (e.g., stained soil, and soil or groundwater with solvent or chemical odors) if such soils or impacted wastes are encountered, and
2. Specific actions to reduce hazards to construction workers and off-site receptors during the construction phase.

The plan must establish engineering controls and soil management practices to protect construction worker safety, protect the health of future workers and visitors, and prevent the off-site migration of contaminants from the project. These measures and practices shall include, but are not limited to:

- Stockpile management, including stormwater pollution prevention and the installation of best management practices.
- Proper disposal procedures of contaminated materials.
- Investigation procedures for encountering known and unexpected odorous or visually stained soils, other indications of hydrocarbon piping or equipment, and/or debris during ground-disturbing activities.
- Monitoring and reporting.
- An environmental health and safety plan for contractors working at the project site that addresses the safety and health hazards of each phase of site construction activities with the requirements and procedures for employee protection.
- The environmental health and safety plan shall outline proper soil handling procedures and health and safety requirements to minimize worker and public exposure to hazardous materials during construction.

The City shall review the SMP and have the authority to propose and include modifications prior to finalization. The City shall review the final SMP prior to issuance of grading permits. The project applicant shall implement the SMP during demolition, grading, and construction at the project site.

Significance After Mitigation

Implementation of Mitigation Measure HAZ-1 would reduce the potential construction impacts related to unknown hazardous substance releases to a less-than-significant level.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

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?

The Fresno Chandler Executive Airport is located approximately 0.8-mile west of the project site. However, the project site is located outside of the designated runway protection zone or noise contours (FCOG 2018). Furthermore, there are no private airstrips in the vicinity of the project site. Although the project site would potentially be subject to occasional aircraft overflight noise, such occurrences would be intermittent, temporary, and would not present a safety hazard for individuals as the project would be limited to water and sewer pipeline rehabilitation and replacement. Therefore, no impact would occur.

NO IMPACT

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

As discussed in Section 17, *Transportation,* the proposed project would not impair implementation or physically interfere with an adopted emergency response plan or emergency evacuation plan. Although there would be construction-related vehicle trips associated with the project, equipment

staging would occur on property owned by the City and result in minimal trips. Management of lane closures during construction would be addressed via a traffic control plan required by the City. The City Public Works Department, Traffic Operations and Planning Division, and the contractor would coordinate the traffic control plan(s) and sequence of construction work to eliminate potential major detours and traffic hazards. Site access would be provided to nearby residents and business owners, as necessary during construction. Emergency vehicle access would remain accessible at all times and any necessary detours would be communicated with emergency personnel in advance.

No changes to the existing street system are proposed that could result in inadequate emergency access post-construction, nor would project operation and maintenance introduce new activities or substantial operational traffic with the potential to result in inadequate emergency access. Operational use of the proposed project (via underground water and sewer pipelines and manholes) would return to existing conditions, which currently do not interfere with an adopted emergency response plan or emergency evacuation plan. Therefore, impacts related to emergency access during project operation would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

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

According to the California Forestry and Fire Protection Department (CAL FIRE), the project site is not located within a designated Very High Fire Hazard Severity Zone (VHFHSZ) nor located within a State Responsibility Area (SRA) (CAL FIRE 2025). The nearest designated VHFHSZ is located approximately 16 miles northeast of the project site.

The proposed pipeline would be located within previously disturbed and developed public rights-of-way in the urban Downtown area. Potential ignition sources may include sparks from exhaust pipes, discarded cigarette butts, contact of mufflers with dry grass, other sources of sparks or flame, and spills or releases of flammable materials such as gasoline. Construction equipment would be subject to standard operating procedures that would limit sources of ignition that could generate a wildland fire. All construction activities on the project site require fire safety protocols, including, but not limited to, on-site fire extinguishing equipment. Compliance with applicable federal and State laws and regulations related to the proper use, storage, and transport of hazardous materials would also reduce the risk of wildfire ignition from the use of hazardous materials (such as fuels) during construction activities. As such, project construction would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires, and the impact would be less than significant.

Project operation would not involve potentially flammable materials or activities that could result in wildfire ignition, and the pipelines would be located entirely underground. The impact related to wildland fires would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

This page left intentionally blank.

10 Hydrology and Water Quality

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than - Significant Impact	No Impact
Would the project:				
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?	☐	☐	☐	■

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

Grading, excavation, and other construction activities associated with the project could adversely affect water quality due to erosion resulting from exposed soils and generation of water pollutants, including trash, construction materials, and equipment fluids. Soil disturbance associated with site preparation and grading activities would result in looser, exposed soils, which are more susceptible to erosion. Additionally, spills, leakage, or improper handling and storage of substances such as oils, fuels, chemicals, metals, and other substances from vehicles, equipment, and materials used during project construction could contribute to stormwater pollutants or leach to underlying groundwater.

Construction activities would be subject to the NPDES Construction General Permit, which requires visual monitoring of stormwater and non-stormwater discharges, sampling, analysis, and monitoring of non-visible pollutants, and compliance with all applicable water quality standards established for receiving waters potentially affected by construction discharges. Furthermore, the Construction General Permit requires implementation of a SWPPP that outlines project-specific BMPs to control erosion. Such BMPs may include but would not be limited to the use of temporary de-silting basins, construction vehicle maintenance in staging areas to avoid leaks, and installation of silt fences and erosion control blankets. The construction SWPPP and BMPs would be designed to prevent sedimentation of both on-site and off-site surface waters from construction activities; prevent leaking of pollutants such as oil, grease, and chemicals; and implement spill control and response measures in the case of accidental releases. As such, construction-related impacts would be less than significant.

The project would not involve the storage of chemicals on site. Project operation would not involve ground disturbance, which would limit the potential for off-site migration of sediment and adsorbed pollutants in runoff. Operational activities of the project would be the same as under existing conditions for the existing water and sewer system. Given that chemicals would not be stored on site and that the project would not introduce new sources of potential pollutants, project operation would not violate any water quality standards, waste discharge requirements, or otherwise substantially degrade water quality. The impact would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

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?

Groundwater in the vicinity of the proposed project has been measured at least 90 feet below ground surface (SWRCB 2025a). The maximum excavation depth within the construction envelope of the project site is anticipated to be approximately 15 feet below ground surface. Therefore, groundwater is not expected to be encountered during project construction activities nor be extracted for water supply. The proposed project would not expand impervious surface area within the project site which could inhibit groundwater recharge, as the project consists of repairs to existing water and sewer infrastructure. As such, the project would not decrease groundwater supplies or interfere with groundwater recharge. No impact related to groundwater supplies or groundwater recharge would occur.

NO IMPACT

c.(i) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site?

c.(ii) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

c.(iii) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

c.(iv) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows?

The proposed project would not alter the course of a stream or river, as none are located within the project site. The proposed project would not change drainage patterns on site because all water and sewer pipelines and manholes are underground (except surface vault covers). The pipelines would be installed and removed via open-cut trenching. Roadway surfaces would be restored to pre-construction conditions once the water and sewer improvements are complete. As a result, the project would not substantially alter the existing drainage pattern of the site or area in a manner that would result in substantial erosion or siltation on- or off-site; substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site; 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 impede or redirect flood flows. Impacts would be less than significant.

According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map, the project site is located within Zone X and Zone A (FEMA 2009). Zone X indicates an area of minimal flood hazard and Zone A indicates an area of one percent annual chance of flooding. As the project would not substantially modify the existing drainage patterns on site, no changes to the flooding pattern of the project site and its vicinity would occur as a result. The project would not result in flooding on- or off-site, and would not impede or redirect flood flows.

During large storm events, some runoff from the project site may flow into the storm drain system associated with the paved roadways within the project site. However, no expansion of stormwater drainage systems would be necessary to accommodate runoff from the project. The project would not alter the course of a stream or river, and would not divert or redirect flood flows. Potential impacts related to the alteration of the site's drainage pattern would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

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

The project site is located over 110 miles east the Pacific Ocean, separated by the Diablo mountain range, therefore it is not subject to tsunami risk.

A seiche is a surface wave created when an inland water body is shaken, usually by an earthquake. The nearest water body to the project capable of generating a seiche is Big Dry Creek Reservoir approximately 12 miles to the northeast. The project site is partially within the dam inundation area for Big Dry Creek Dam according the Fresno Metropolitan Flood Control District (FMFCD) (FMFCD 2016). Although there is some potential for inundation from a seiche, the proposed water and sewer pipelines would be installed underground and would not be affected by surface flooding. The project would not increase the likelihood of a seiche occurring, and this hazard represents an existing condition at the site. Furthermore, because the pipelines would be underground, the project would not pose a risk of pollutant release in the event of a tsunami, seiche, or other flooding event. Impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

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

The City of Fresno is within the Tulare Lake Basin and is under the jurisdiction of the Central Valley RWQCB (Region 5). The Central Valley RWQCB Region is divided into three basins, the Sacramento River Basin, San Joaquin River Basin, and Tulare Lake Basin in which the project is located. The Central Valley RWQCB monitors surface water quality through implementation of the Water Quality Control Plan for the Tulare Lake Basin (Basin Plan) and designates beneficial uses for surface water bodies and groundwater in the Basin. The Basin Plan also contains water quality criteria for groundwater. As mentioned in threshold a, the project would not substantially degrade surface or groundwater quality. As described in threshold b, the project would not decrease groundwater supplies or impede groundwater recharge. As such, the proposed project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. No impact would occur.

NO IMPACT

11 Land Use and Planning

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than - Significant Impact	No Impact
Would the project:				
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?	☐	☐	☐	■

a. Would the project physically divide an established community?

The proposed project involves the replacement and rehabilitation of existing underground water and sewer pipelines and manholes, construction of new pipeline alignments, and abandonment of existing pipelines and would not involve any habitable structures. No modifications to existing land uses would occur and all project activities would take place within the roadway rights-of-way. Therefore, the proposed project would not physically divide an established community. No impact would occur.

NO IMPACT

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

Pursuant to California Government Code Section 53091, the building and zoning ordinances of a county or city do not apply to the location or construction of facilities for the production, storage, or transmission of water, wastewater, or electrical energy by a local agency. The proposed project would entail approximately 15,900 linear feet of waterline improvements and 13,400 linear feet of sewer rehabilitation. Therefore, the building and zoning ordinances of the City of Fresno would not apply to the proposed project. However, the project was evaluated for consistency with the County's General Plan.

The City of Fresno General Plan identifies objectives and policies to maintain public infrastructure and provide clean water for residents and businesses. The proposed project's consistency with applicable General Plan goals, objectives, and policies is described in Table 6.

Table 6 General Plan Consistency

General Plan Goal or Policy	Proposed Project Consistency
Policy ED-3-f. Strive to provide necessary major street infrastructure and utility capacities for properly zoned land, consistent with the General Plan, so this land can be efficiently and effectively developed in a timely manner. Ensure the City's public works, public utilities, and transit capital improvement plans are aligned to support the economic development objectives in the General Plan.	**Consistent.** As discussed in Section 2, *Project Description*, the proposed project aims to support the growth in the City of Fresno's Downtown area, infill of existing available land, and upgrades to existing facilities. In addition, the proposed project would support the City's goal of eliminating water and sanitary sewer service from alleys as well as upsize to consistent diameters where possible.
Policy ED-5-a: Standards and Service Districts. Establish levels of service and development standards for necessary public infrastructure to be built and maintained with funding through capital improvement and maintenance districts	**Consistent:** The proposed project is being funded through the California Housing and Community Development Infill Infrastructure Grant Catalytic Qualifying Infill Area Program (IIGC Grant).
Goal 12: Resolve existing public infrastructure and service deficiencies, make full use of existing infrastructure, and invest in improvements to increase competitiveness and promote economic growth.	**Consistent:** The proposed project would include waterline improvements and sewer rehabilitation and would involve pipeline installation, replacement, and rehabilitation in the Downtown Fresno area.

Source: City of Fresno General Plan 2024

As shown in Table 6, the proposed project would actively support the City's goals, policies, and objectives related to providing an adequate public service facilities, supplying clean water to meet local demands and improving local infrastructure. Therefore, the project would not 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, and no impact would occur.

NO IMPACT

12 Mineral Resources

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

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?

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?

The project site is an urbanized Downtown area that is not suitable or used for mineral resource extraction. According to the Fresno County General Plan Background Report, the project is in Mineral Resources Zone 3 (MRZ-3) (Fresno County 2000). MRZ-3 are categorized as areas that may contain additional resources of economic importance. No mines or quarries exist on or near the project site. The proposed project would not result in the loss of availability of a known mineral resource or a locally important mineral resource recovery site. No impact would occur.

NO IMPACT

This page intentionally left blank.

13 Noise

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

Background

Noise

Sound is a vibratory disturbance created by a moving or vibrating source, which is capable of being detected by the hearing organs. Noise is defined as sound that is loud, unpleasant, unexpected, or undesired and may therefore be classified as a more specific group of sounds. The effects of noise on people can include general annoyance, interference with speech communication, sleep disturbance, and, in the extreme, hearing impairment (Caltrans 2013).

Noise levels are commonly measured in decibels (dB) using the A-weighted sound pressure level (dBA). The A-weighting scale is an adjustment to the actual sound pressure levels so that they are consistent with the human hearing response. Decibels are measured on a logarithmic scale that quantifies sound intensity in a manner similar to the Richter scale used to measure earthquake magnitudes. A doubling of the energy of a noise source, such as doubling of traffic volume, would increase the noise level by 3-dB; dividing the energy in half would result in a 3-dB decrease (Crocker 2007).

Human perception of noise has no simple correlation with sound energy: the perception of sound is not linear in terms of dBA or in terms of sound energy. Two sources do not “sound twice as loud” as one source. It is widely accepted that the average healthy ear can barely perceive changes of 3-dBA, increase or decrease (i.e., twice the sound energy); that a change of 5-dBA is readily perceptible

(eight times the sound energy); and that an increase (or decrease) of 10-dBA sounds twice (half) as loud (10.5 times the sound energy) (Crocker 2007).

Some land uses are more sensitive to ambient noise levels than other uses due to the amount of noise exposure and the types of activities involved. For example, residences, motels, hotels, schools, libraries, churches, nursing homes, auditoriums, museums, cultural facilities, parks, and outdoor recreation areas are more sensitive to noise than commercial and industrial land uses.

Vibration

Vibration is a unique form of noise because its energy is carried through buildings, structures, and the ground, whereas sound is simply carried through the air. Thus, vibration is generally felt rather than heard. Some vibration effects can be caused by noise (e.g., the rattling of windows from passing trucks). This phenomenon is caused by the coupling of the acoustic energy at frequencies that are close to the resonant frequency of the material being vibrated. Typically, ground-borne vibration generated by manmade activities attenuates rapidly as distance from the source of the vibration increases.

Existing Noise Environment

The most common and primary existing sources of noise along the project alignment are motor vehicle traffic (e.g., automobiles, buses, trucks, and motorcycles) along primary roadways in Downtown Fresno, including Fresno Street, Tulare Street, Mono Street, Fulton Street, among other roadway segments and truck circulation associated with industrial and manufacturing land uses north and south of the railroad tracks. Motor vehicle noise is of concern because it is characterized by a high number of individual events, which often create a sustained noise level, and because of its proximity to noise sensitive uses. Through residential areas, noise along the project alignment would be characterized by sources typical of residential neighborhoods, including light vehicular traffic, car doors opening and closing, conversation, children playing, and dogs barking. Additionally, the project alignment is located approximately 0.8-mile east of the Fresno Chandler Executive Airport, within the airport influence area (FCOG 2018). However, according to the Fresno County Airport Land Use Compatibility Plan, no portion of the project alignment is within the airport's present or future 60 or 65 CNEL noise contours (FCOG 2018). Furthermore, the Union Pacific Railroad tracks bisect the project area and is an additional source of noise.

To characterize ambient sound levels at and near the project site, four 15-minute sound level measurements were conducted on May 15, 2025. Short-term (ST) noise Measurement 1 was taken south of the single-family residence at 650 F Street; ST-2 was taken near the RH Christian Center at 1023 Fulton Street; ST-3 was taken at the southern corner of Hotel Fresno building at 1241 Broadway Street; and ST-4 was taken 40 feet northwest of the northern corner of Fulton Street and Merced Street. These four noise measurements were taken near the proposed new water and sewer pipe installation areas in the northern portion of the project site, as the sewer pipe rehabilitation activities in the southern portion of the project site would be less intensive.

The measurements were completed using a Piccolo II sound level meter fitted with a windscreen. The meter complies with American National Standards Institute (ANSI) Standard S1.4. The sound level meters were set to "slow" response and "A" weighting (dBA). The meters were calibrated prior to and after the monitoring period. All measurements were at least five feet above the ground and away from reflective surfaces. Table 7 summarizes the results of the noise measurements. Noise measurement locations are shown in Figure 7.

Figure 7 Approximate Noise Measurement Locations

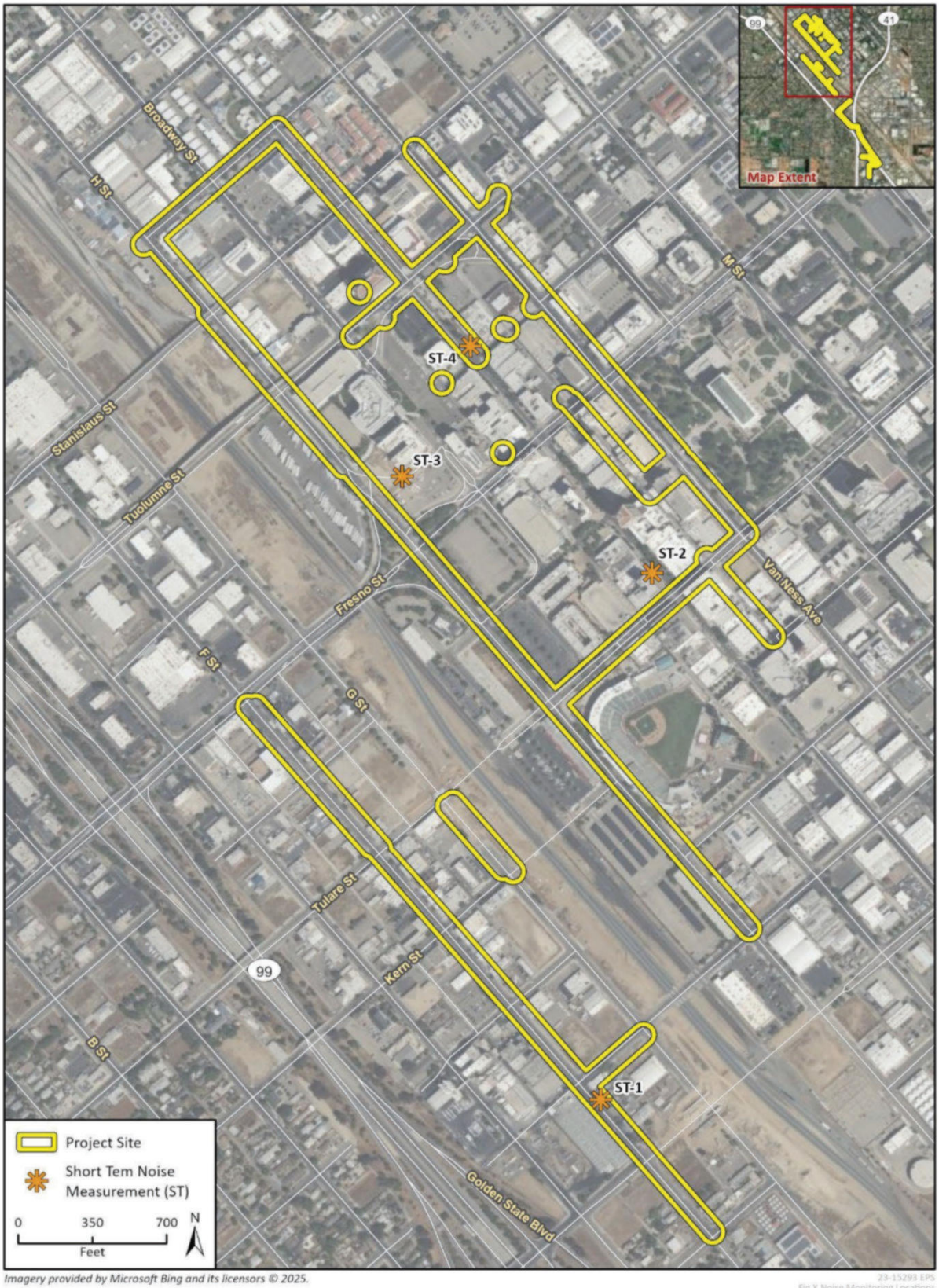


Table 7 Project Site Noise Monitoring Results – Short Term

Measurement	Location	Sample Times	Approximate Distance to Primary Noise Source	L_{eq} (dBA)	L_{max} (dBA)	L_{min} (dBA)
ST-1	South of the single-family residence at 650 F Street	11:11 – 11:26 a.m.	Approximately 35 feet to the centerline on F Street.	65	82	55
ST-2	Near the RH Christian Center at 1023 Fulton Street	12:07 – 12:22 p.m.	Approximately 30 feet to the centerline on Fulton Street.	62	82	50
ST-3	Southern corner of Hotel Fresno building at 1241 Broadway Street.	12:31 – 12:46 p.m.	Approximately 175 feet to the centerline of Broadway	57	67	52
ST-4	Approximately 40 feet northwest of the northern corner of Fulton Street and Merced Street	12:53 – 1:08 p.m.	Approximately 30 feet to the centerline on Fulton Street.	57	72	50

Approximate noise measurement locations are shown in Figure 7.

Regulatory Framework

Noise

The Fresno General Plan Noise and Safety Element includes objectives and policies to protect public health and welfare from excessive noise (Fresno 2014). The Noise and Safety Element provides an approach to regulate noise through community planning and includes the following noise standards for transportation (Table 8) and stationary sources (Table 9).

Table 8 Transportation (Non-Aircraft) Noise Sources

Noise-Sensitive Land Use	Outdoor Activity Areas[1] Ldn/CNEL, dB	Interior Spaces	
		Ldn/CNEL, dB	Leq dB[2]
Residential	65	45	–
Transient Lodging	65	45	–
Hospitals, Nursing Homes	65	45	–
Theaters, Auditoriums, Music Halls	–	–	35
Churches, Meeting Halls	65	–	45
Office Buildings	–	–	45
Schools, Libraries, Museums	–	–	45

[1] Where the location of outdoor activity areas is unknown or is not applicable, the exterior noise level standard shall be applied to the property line of the receiving land use.

[2] As determined for a typical worst-case hour during periods of use.

Source: Fresno General Plan, Noise and Safety Element, Table 9-2 (Fresno 2014)

Table 9 Stationary Noise Sources

Noise Metric	Daytime (7:00 a.m. – 10:00 p.m.)	Nighttime (10:00 p.m. – 7:00 a.m.)
Hourly Equivalent Sound Level (Leq), dBA	50	45
Maximum Sound Level (Lmax), dBA	70	60

The Department of Development and Resource Management Director, on a case-by-case basis, may designate land uses other than those shown in this table to be noise-sensitive, and may require appropriate noise mitigation measures.

As determined at outdoor activity areas. Where the location of outdoor activity areas is unknown or not applicable, the noise exposure standard shall be applied at the property line of the receiving land use. When ambient noise levels exceed or equal the levels in this table, mitigation shall only be required to limit noise to the ambient plus five dB.

Source: Fresno General Plan, Noise and Safety Element, Table 9-3 (Fresno 2014).

Fresno Municipal Code Section 15-02506(D) reiterates the noise standards for stationary sources provided in the Fresno General Plan Noise and Safety Element and summarized in Table 9. Section 15-2506(D)(4) states that when ambient levels exceed the stationary source noise standards, mitigation shall be required to limit noise to the ambient noise level plus five (5) decibels.

Section 10-109 of the Fresno Municipal Code provides exceptions to the City's noise ordinance, stating that the provisions of the noise ordinance do not apply to construction, repair, or remodeling work accomplished pursuant to applicable permits issued by the City or other governmental agency, or to site preparation or grading, provided such work takes place from 7:00 a.m. – 10:00 p.m. on Monday through Saturday.

Finally, the Fresno County Airport Land Use Compatibility Plan establishes a noise land use compatibility matrix for land uses affected by airport noise. According to the Airport Land Use Compatibility Plan, outdoor recreation, including trails, are conditionally compatible within the 65-69 CNEL range, and incompatible within the 70-74 CNEL and 75+ CNEL range (FCOG 2018).

Vibration

Fresno Municipal Code Section 15-2507 states that no vibration shall be produced that is transmitted through the ground and is discernable without the aid of instruments by a reasonable person at the lot lines of a site. Vibration from temporary construction, demolition, and vehicles that enter and leave the subject parcel are exempt from this standard. The Fresno Municipal Code does not establish quantitative standards for vibration. Therefore, vibration impacts are analyzed using the thresholds from Caltrans' *Transportation and Construction Vibration Guidance Manual* and the FTA's *Transit Noise and Vibration Impact Assessment Manual* (Caltrans 2013; FTA 2018). From these documents, the applicable thresholds for the vibration analysis are 0.5 peak particle velocity (PPV) inches per second at residential structures and the human "distinctly perceptible" threshold of 0.25 PPV inches per second.

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?

Construction noise was estimated using the FHWA Roadway Construction Noise Model (RCNM). RCNM predicts construction noise levels for a variety of construction operations based on empirical data and the application of acoustical propagation formulas. Using RCNM, construction noise levels were estimated at noise-sensitive receivers near the project site. RCNM provides reference noise levels for standard construction equipment, with an attenuation rate of 6 dBA per doubling of distance for stationary equipment.

Construction activity would result in temporary noise in the project site vicinity, exposing nearby receivers to increased noise levels. Using the three loudest pieces of construction equipment during each phase, construction noise would typically be higher during the more intensive phases of construction (i.e., demolition and site preparation) and would be lower during the less intensive construction phases (i.e., grading, infrastructure installation, paving, and site restoration). Per information provided by the City, heavy construction equipment during demolition and site preparation could include a concrete saw, and backhoe. The less intensive phases of construction could include roller, excavator and backhoe and would have lower construction noise levels. It is assumed diesel engines would power all construction equipment.

Project construction would occur between January 15, 2026 and June 30, 2027, and the closest sensitive receptors to project construction would be a multi-family residence at 2171 S. Lily Street (approximately 15 feet from the project alignment) and single-family residences north of F Street (approximately 40 feet from the project alignment). Additional sensitive receptors located throughout the vicinity of the project alignment include single-family and multi-family residences, hotels, schools, and churches. Construction equipment would not all operate at the same time or location, as equipment would travel along the proposed project's alignment, limiting the duration of construction activities in proximity to any single receptor. In addition, construction equipment would not be in constant use during the eight-hour operating day.
Table 10 summarizes construction noise associated with each phase of construction, based on the equipment list provided by the City. As shown in Table 10, construction noise levels would be up to 95-dBA L_{eq} at the nearest residences during excavation and site preparation.

Table 10 Construction Noise Levels

Phase[1]	Noise Level at Sensitive Receptors (dBA L_{eq})		
	RCNM Reference Noise Level (50 feet)	Multi-Family Residential – 2171 S. Lily Ave (15 feet)	Single-Family Residential – F Street (40 feet)
Demolition	84	95[1]	86
Site Preparation	84	95	86
Grading	80	91	82
Infrastructure Installation	81	92	83
Paving/Site Restoration	81	92	83

See Appendix D for RCNM worksheets.

[1] Demolition is not required near this receptor as this is a sewer pipe rehabilitation.

Per Section 10-109, construction, repair, or remodeling work accomplished pursuant to applicable permits issued by the City or other governmental agency, or site preparation or grading, provided such work takes place from 7:00 a.m. to 10:00 p.m. on Monday through Saturday, is exempt from the City's noise ordinance. On-site construction activities would only occur within the City's construction-exempt hours. In addition, construction activities would occur only during daytime hours, when the existing ambient noise level is at its highest (e.g., traffic noise); no nighttime construction would occur, and the proposed construction activities would be limited in duration. Therefore, construction of the proposed project is not expected to result in temporary substantial noise increases relative to existing conditions and daytime construction noise impacts would be less than significant.

The proposed project would involve 15,900 linear feet of waterline improvements and 13,400 linear feet of sewer improvements. The project would not involve any new operation and maintenance activities. No new employees would be required. Therefore, project operations would not generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project site in excess of applicable standards, and no impacts would occur from operational noise.

LESS THAN SIGNIFICANT IMPACT

b. Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

Construction activities have the greatest potential to generate ground-borne vibration affecting nearby receivers. Construction equipment may be used within 15 feet of historic structures residential structures. The greatest anticipated source of vibration during project construction activities would be from a vibratory roller. Vibration levels from these pieces of equipment are shown in Table 11. As shown in the table, vibration levels would exceed the architectural damage criterion of 0.12 in/sec PPV at the nearest historical structures from a vibratory roller. Specifically, a vibratory roller would exceed the criterion at a distance of 37 feet. Therefore, if construction with this equipment occurs within those distances to historic buildings, impacts would be potentially significant. Historic buildings identified at this distance include 1065 Van Ness Avenue, 1306 – 1360 Van Ness Avenue, 2111 Tuolumne Street, 2014 Tulare Street and 664 F Street. Construction vibration would not exceed the architectural damage criterion of 0.5 in/sec PPV at the nearest residences. Implementation of Mitigation Measure NOI-1 is required if construction occurs adjacent to historic structures.

Table 11 Construction Vibration Levels

	PPV (in/sec)			
Equipment	**Reference Level 25 Feet**	**Nearest Historic Building (15 feet)**	**Nearest Multi-Residential Building (23 Feet)**	**Nearest Single-Residential Building (25 Feet)**
Vibratory Roller	0.210	0.501	0.238	0.210
Large Bulldozer[1]	0.089	0.191	0.101	0.089
Loaded Trucks	0.076	0.164	0.086	0.076
Static Roller	0.050	0.119	0.057	0.050
Small Bulldozer	0.003	0.006	0.003	0.003
Threshold for Building Damage	–	0.12	0.5	0.5
Human “distinctly perceptible” threshold	–	0.25	0.25	0.25
Threshold Exceeded?	–	**Yes**	**No**	**No**

PPV = peak particle velocity; in/sec = inches per second

Note: Vibration analysis worksheets are included in Appendix D.

[1] Large Bulldozer is used as a reference noise level for Front End Loader

Source: FTA 2018

The project does not include any substantial vibration sources associated with operation. Therefore, project operation would not generate excessive groundborne vibration or groundborne noise levels, and no impact would occur.

Mitigation Measures

The following mitigation measure would be required to reduce construction vibration impacts to historic buildings:

NOI-1 Construction Vibration Control Plan

- For paving activities within 37 feet of a historic building, use of a static roller in lieu of a vibratory roller shall be implemented. City staff shall verify that this requirement is incorporated into construction plans prior to issuance of a building permit.
- For large earthmoving activities within 21 feet of a historic building, use of a small bulldozer or equivalent equipment with less than 100 horsepower in lieu of a large bulldozer shall be implemented. City staff shall verify that this requirement is incorporated into construction plans prior to issuance of a building permit.

Significance After Mitigation

Mitigation NOI-1 would require that use of a static roller in lieu of a vibratory roller is used within 37 feet of historic buildings to reduce construction-related vibration. Specifically, use of a static roller would generate vibration levels of approximately 0.05 in/sec PPV at a distance of 25 feet (McIver 2012). A static roller would generate approximately 0.119 in/sec PPV within 15 feet of historic buildings. Additionally, use of a small bulldozer would generate vibration levels of approximately 0.003 in/sec PPV at a distance of 25 feet (FTA 2018). A small bulldozer would generate approximately 0.004 in/sec PPV within 15 feet of historic buildings. With implementation of Mitigation Measure NOI-1, project groundborne vibration would be less than the significance threshold of 0.12 in/sec PPV at the historic buildings near the proposed project at 1065 Van Ness Avenue, 1306 – 1360 Van Ness Avenue, 2111 Tuolumne Street, 2014 Tulare Street and 664 F Street. Therefore, with mitigation, project construction vibration impacts to historic buildings would be less than significant.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

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?

The project alignment is within the airport influence area of the Fresno Chandler Executive Airport, located approximately 0.8 miles to the west. According to the Fresno County Airport Land Use Compatibility Plan (FCOG 2018), no portion of the project alignment is located within the existing or future 60 or 65 CNEL noise contours. The project does not include construction of habitable structures that would expose residences or workers to excessive noise levels. Therefore, there is no impact related to exposure to excessive aviation-related noise.

NO IMPACT

14 Population and Housing

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than - Significant Impact	No Impact
Would the project:				
a. Induce substantial unplanned population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)?	☐	☐	■	☐
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	■

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)?

Given the nature of the proposed project, the City is expected to contract with local construction firms for water and sewer construction activities. As such, construction workers would be drawn from the greater Fresno region, and the project would not result in new population growth for construction of the project. The proposed project would not involve any components (i.e., construction of residential units or businesses) which would directly increase population growth. However, as detailed under Section 6, *Project Characteristics*, funding for this project has been secured through the IIGC Grant which is intended to fund infrastructure upgrades to support infill housing development, as planned for and previously environmentally assessed within the Fresno Multi-Jurisdictional 2023-2031 Housing Element, Downtown Neighborhoods Community Plan, Fulton Corridor Specific Plan, and Downtown Development Code and their respective environmental documentation. Thus, the proposed project could indirectly induce population growth within the Downtown Fresno area. However, this housing and corresponding population growth is supported by the proposed project and would be consistent with the planned growth of adopted long-range plans that have previously assessed growth inducing impacts in their respective environmental documentation. Therefore, the project would not induce substantial unplanned population growth in an area, either directly or indirectly, and the impact would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

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

The project activities would occur entirely within roadway rights-of-way. There is no existing housing within the project alignment, and no demolition of existing housing would occur as part of project construction. Therefore, the project would not displace substantial numbers of existing people or housing, and no impact would occur.

NO IMPACT

This page intentionally left blank.

15 Public Services

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than - Significant Impact	No Impact
a. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
1 Fire protection?	☐	☐	☐	■
2 Police protection?	☐	☐	☐	■
3 Schools?	☐	☐	☐	■
4 Parks?	☐	☐	☐	■
5 Other public facilities?	☐	☐	☐	■

a.1. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities, or the need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?

The closest fire station to the northern project alignment is Fresno Fire Department Station #3, located at 1406 Fresno Street. The closest fire station to the southern project alignment is Fresno Fire Department Station #7, located at 2571 South Cherry Avenue. As discussed in Section 14, *Population and Housing*, no unplanned population growth would occur as a result of the construction or operation of the proposed project, as the project would support planned infill within the Downtown Fresno area. The proposed project would not involve development of other land uses which would require additional fire protection services. The project would not require additional or unusual fire protection resources beyond those required for the existing facilities on the project site. Therefore, no impact to fire protection services would occur.

NO IMPACT

a.2. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities, or the need for new or physically altered police protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?

There are two police stations near the project site, the Fresno Police Department Southwest Station, located at 1211 Fresno Street and the Fresno Police Department Headquarters, located at 2323 Mariposa Mall. As discussed in Section 14, *Population and Housing*, no unplanned population growth would occur as a result of the construction or operation of the proposed project, as the project would support planned population growth. The proposed project would not involve development of other land uses which would require additional police protection services. The project would not require additional or unusual police protection resources beyond those required for the existing facilities on the project site. Thus, the proposed project would not result in an impact associated with the provision of new or physically altered police protection facilities. Therefore, no impact to police protection services would occur.

NO IMPACT

a.3. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered schools, or the need for new or physically altered schools, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives?

As discussed in Section 14, *Population and Housing*, no unplanned population growth would occur as a result of the construction or operation of the proposed project, as the proposed project would support planned infill within the Downtown Fresno area. Therefore, the proposed project would not require new or physically altered schools and no impact would occur.

NO IMPACT

a.4. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered parks, or the need for new or physically altered parks, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives?

As discussed in Section 14, *Population and Housing*, no unplanned population growth would occur as a result of the construction or operation of the proposed project, as the proposed project would support planned infill within the Downtown Fresno area. Therefore, the proposed project would not require new or physically altered parks and no impact would occur.

NO IMPACT

a.5. Would the project result in substantial adverse physical impacts associated with the provision of other new or physically altered public facilities, or the need for other new or physically altered public facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?

As discussed in Section 14, *Population and Housing*, no unplanned population growth would occur as a result of the construction or operation of the proposed project, as the proposed project would support planned infill within the Downtown Fresno area. Therefore, the proposed project would not require new or physically altered public facilities and no impact would occur.

NO IMPACT

This page left intentionally blank.

16 Recreation

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than - Significant Impact	No Impact
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?	☐	☐	☐	■
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?	☐	☐	☐	■

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?

As discussed in Section 14, *Population and Housing*, the proposed project would not directly or indirectly generate unplanned population growth and therefore would not 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 would occur.

NO IMPACT

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?

The project would involve waterline improvements and sewer rehabilitation. The project would not involve construction or expansion of recreational facilities. As discussed in Section 14, *Population and Housing*, the proposed project would not directly or indirectly generate unplanned population growth and therefore would not require the construction or expansion of recreational facilities. No impact would occur.

NO IMPACT

This page intentionally left blank.

17 Transportation

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than - Significant Impact	No Impact
Would the project:				
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 use (e.g., farm equipment)?	☐	☐	☐	■
d. Result in inadequate emergency access?	☐	☐	■	☐

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

Construction-related vehicle trips would include construction workers traveling to and from the project site, haul trucks (for soil import), and other trucks associated with equipment and material deliveries. Construction traffic would be temporary and limited to the duration of the construction schedule (January 2026 through June 2027). After construction is complete, no changes to existing transportation patterns would occur because the rehabilitated and replaced pipelines would be located underground, and no new operation and maintenance activities would be required for the project. The minimal level of traffic generated during project construction would not have the potential to conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. The impact would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

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

CEQA Guidelines Section 15064.3(b) identifies criteria for evaluating transportation impacts. Specifically, the guidelines state vehicle miles traveled (VMT) exceeding an applicable threshold of significance may indicate a significant impact. According to Section 15064.3(b)(3) of the CEQA Guidelines, a lead agency may include a qualitative analysis of operational and construction traffic. A VMT calculation is typically conducted on a daily or annual basis, for long-range planning purposes. Increases in VMT from project construction would be short-term, minimal, and temporary. Project operation would not involve any new maintenance activities compared to

existing conditions. Therefore, operational VMT in the project area would not be increased. Impacts associated with VMT would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

c. Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment)?

Project components consist of installation, rehabilitation, and replacement of water and sewer pipelines and manholes that are located underground (except surface vault covers). The project would result in no changes to the existing road geometry of the public roads within the project site. Construction activities associated with the proposed project would result in temporary road lane closures or associated traffic impacts. The project would implement a traffic control plan, required by the City, to manage temporary lane closures during construction. Although construction of the project would temporarily increase heavy vehicle trips to and from the project site, such effects would be localized and temporary and would not have potential to increase hazards in the project area. The proposed project would therefore not create or substantially increase traffic hazards due to a geometric design feature or incompatible use. No impact would occur.

NO IMPACT

d. Would the project result in inadequate emergency access?

Construction activities associated with the proposed project would result in road lane closures or associated traffic impacts. The project would implement a traffic control plan, required by the City, to manage temporary lane closures during construction. Although construction of the project would temporarily increase heavy vehicle trips to and from the project site, such effects would be localized and temporary and would not have potential to impede emergency access in the project area. Operational activities associated with the proposed project would occur solely on the project site and would not interfere with emergency response and would not be greater than existing maintenance. Consequently, the project would not result in inadequate emergency access, and the impact would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

18 Tribal Cultural Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than - Significant Impact	No Impact
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in a Public Resources Code Section 21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?	☐	■	☐	☐
b. 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.	☐	■	☐	☐

This section presents a setting, regulatory requirements, describes the Assembly Bill 52 process and outcome, and evaluates potential impacts related to implementation of the project.

Existing Setting

The project site is located in the traditional territory of the Penutian-speaking Yokuts, specifically, the Southern Valley Yokuts ethnographic territory. The Southern Valley Yokuts occupied the southern San Joaquin Valley south of the San Joaquin River, to the foot of the Tehachapi Mountains; a region with over 11,500 years of documented occupation by Native American tribes. Today, Southern Valley Yokuts tribes and individuals remain politically and culturally active.

Rincon contacted the Native American Heritage Commission (NAHC) on March 19, 2025, to request a search of the Sacred Lands File (SLF), as well as an AB 52 contact list of California Native American tribal representatives who are traditionally or culturally affiliated with the geographic area of the Project**.** On April 9, 2025, the NAHC responded to the request, stating that the results of the SLF search were negative and they provided an AB 52 contact list for the project.

Regulatory Framework

AB 52 is required when a project is subject to CEQA and a Notice of Preparation for an Environmental Impact Report (EIR) or a Notice of Intent to adopt a Negative Declaration or Mitigated Negative Declaration is filed on or after July 1, 2015.

AB 52, enacted in September 2014, recognizes that California Native American Tribes have expertise with regard to their tribal history and practices. The law established a new category of resources in CEQA, tribal cultural resources, to consider tribal cultural values when determining the impacts of projects (PRC Sections 21080.3.1, 21084.2, and 21084.3).

PRC Section 21074(a) defines a tribal cultural resource as any of the following:

- Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American Tribe that are either of the following: Included or determined to be eligible for inclusion in the California Register [of Historical Resources]; or included in a local register of historical resources, as defined in PRC Section 5020.1(k).
- A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1. In applying these criteria, the lead agency would consider the significance of the resource to a California Native American Tribe.

AB 52 requires CEQA lead agencies to analyze the impacts of projects on tribal cultural resources separately from impacts on archaeological resources (PRC Sections 21074 and 21083.09) because tribal cultural resources have cultural values beyond their ability to yield data important to prehistory or history. AB 52 also establishes a formal consultation process for California tribes regarding those resources. Under AB 52, lead agencies are required to notify California Native American tribes that are traditionally and culturally affiliated with the geographic area of the proposed project and who have requested notification The consultation process must be completed before a CEQA document can be adopted/certified.

AB 52 Notification Effort

The project is subject to compliance with AB 52, which requires consideration of impacts to TCRs as part of the CEQA process, and that within 14 days of determining to undertake a project the lead agency notify California Native American tribal representatives who are traditionally or culturally affiliated with the geographic area of the Project and who have requested notification.

On April 17 and on April 22, 2025, the City of Fresno notified California Native American tribal representatives of the Project. Those notified include all that appear on the NAHC AB 52 contact list for the project, provided by the NAHC on April 9, 2025. Additionally, other California Native American tribal representatives were notified as well. Notification letters contained a project description, AB 52 noticing requirements, invitation to consult, and contact information for the appropriate City representative. AB 52 allows California Native American tribal representatives 30 days after receiving notification of the project to request consultation. If a response pursuant to AB 52 is not received within 30 days, it is assumed that consultation is declined. To date, notification of the project initiated by the City has not resulted in the identification of a TCR within or near the project site.

The AB 52 notification period ended on May 23, 2025. Three responses from the notified California Native American tribal representatives were received by the City, none resulting in a request for consultation, and the notification process is closed. The confidential AB 52 communication records are on file with the City.

As part of the AB 52 consultation, the City sent AB 52 consultation letters to 15 tribal organizations on April 17, 2025, including the following tribes:

- Amah Mutsun Tribal Band
- Big Sandy Rancheria of Western Mono Indians
- Cold Springs Rancheria
- Dumna Wo-Wah Tribal Government
- Dunlap Band of Mono Indians
- Kings River Choinumni Farm Tribe
- Kitanemuk & Yowlumne Tejon Indians
- North Fork Mono Tribe
- Northern Valley Yokut/Ohlone Tribe
- Picayune Rancheria of Chukchansi Indians
- Santa Rosa Indian Community of the Santa Rosa Rancheria
- Table Mountain Rancheria
- Traditional Choinumni Tribe
- Tule River Indian Tribe
- Wuksache Indian Tribe/Eshom Valley Band

a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code Section 21074 that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?

b. Would the project cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code 21074 that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1?

As detailed above, the results of the NAHC SLF search were negative and no tribal cultural resources either listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k) or 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 have been identified within or within the vicinity of the project site. While the City did receive three responses during the AB 52 notification process, none resulted in a request for consultation, and the AB 52 notification period ended on May 23, 2025. However, project construction activities (such as excavation, grading, and site preparation) have the potential to impact previously unidentified tribal cultural resources. Potentially significant impacts would occur if the implementation of the project would result in construction activities that would damage unidentified significant tribal cultural resources. Implementation of Mitigation Measure CR-3 (Cultural Resources Monitoring Plan) would

ensure that potential impacts to tribal cultural resources would be reduced to a less than significant level.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

19 Utilities and Service Systems

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than - Significant Impact	No Impact
Would the project:				
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental 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?	☐	☐	■	☐

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?

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?

Water and Wastewater

The City owns and operates the water and sewer conveyance, collection, pumping, and treatment facilities within city limits. Water within Fresno is conveyed through 1,897 miles of water mains and treated at three water treatment facilities owned by the City: Northeast Surface Water Treatment

Facility, Southeast Surface Water Treatment Facility, and T-3 Surface Water Treatment Facility (Fresno 2025c). According to the City's 2020 Urban Water Management Plan (UWMP), the City's water supply exceeds the water demand under each year of normal year, single-dry year, and multiple-dry year scenarios (Fresno 2021).

Wastewater within Fresno is conveyed through 1,600 miles of sanitary sewer lines to the Fresno-Clovis Regional Wastewater Reclamation Facility (RWRF) and the North Fresno Wastewater Reclamation Facility (NFWRF) which are both owned and operated by the City (Fresno 2025b). The Fresno-Clovis RWRF has a permitted treatment capacity of 91.5 million gallons per day (MGD) to secondary standards and a permitted treatment capacity of 5 MGD to tertiary standards. The NFWRF has a treatment capacity of 0.71 MGD to tertiary standards.

The proposed project would involve the construction and operation of water and sewer pipelines, manholes, and junction structures, the environmental effects of which are analyzed in this IS-MND. The project would expand service capacity to support planned infill in the Downtown Fresno area. While the project would not induce unplanned growth, it is specifically intended to accommodate projected population increases in accordance with the City's long-range planning efforts. Therefore, while the project would involve the installation of new water and sewer infrastructure, it would not require unanticipated relocation or construction of additional off-site facilities, and impacts would be less than significant.

Stormwater Drainage

As discussed in Section 10, *Hydrology and Water Quality*, the project would generally preserve existing drainage patterns on site. The project would not involve dewatering activities during pipeline installation, rehabilitation, or replacement, as groundwater in the project site and surrounding area has been measured at approximately 90 feet below ground surface, while proposed excavation would extend only to a depth of about 15 feet (SWRCB 2025a). Therefore, no impact related to stormwater drainage would occur.

Electric Power

As discussed in Section 6, *Energy*, the project would not require additional electricity to operate the new, rehabilitated, and replaced pipelines. No new or relocated energy facilities would be required as a result of the proposed project. No impact would occur.

Natural Gas

The project would not involve any components requiring natural gas service and is not anticipated to involve the relocation of existing natural gas facilities. Therefore, no impact to natural gas facilities would occur.

Telecommunications

The project would not require telecommunications to operate the supervisory control and data acquisition system. The project would not involve the relocation of existing telecommunications facilities. Therefore, no impacts related to telecommunications facilities would occur.

LESS-THAN-SIGNIFICANT IMPACT

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?

Water demands associated with construction of the proposed project would be minimal and would be met using existing City supplies and infrastructure. The project is intended to support planned infill within the Downtown Fresno area by constructing new and upsized water and sewer pipelines, as well as rehabilitating and replacing existing water and sewer pipelines to improve system reliability and capacity. The project does not introduce new unplanned demand, but would help ensure adequate infrastructure is in place to serve anticipated growth identified in the City's long-range planning documents. The City of Fresno has accounted for such growth in its water supply planning, including during normal, dry, and multiple dry years. Therefore, the project would not result in insufficient water supplies, and a less than significant impact would occur.

LESS-THAN-SIGNIFICANT 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?

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

Solid waste within Fresno is primarily disposed of at the American Avenue Disposal Site (California Department of Resources Recycling and Recovery [CalRecycle] 2025b). The American Avenue Disposal Site has a remaining capacity of 29,358,535 cy and an estimated closure date of 2031 (CalRecycle 2025a). Other regional landfills which serve Fresno are the Fairmead Solid Waste Disposal Site, Avenal Regional Landfill, Chemical Waste Management, Inc. Unit B-17, and Lost Hills Composting and Bioenergy.

Construction activities may temporarily generate solid waste, including approximately 5,302 cy of excavated soil to be exported from the project site, which would be disposed of in accordance with all applicable federal, State, and local statutes and regulations. While most soil is expected to be reused as backfill material within the project site, exported soil and minimal remaining inert construction waste would be disposed of at existing construction waste landfills in the area, including the American Avenue Disposal Site. The soil exported from the project site would account for approximately 0.01 percent of the remaining capacity of the American Avenue Disposal Site. Therefore, waste generated by construction activities would not exceed the available capacity at the landfills serving the project site and surrounding area that would accept debris generated by the project, such as the American Avenue Disposal Site.

The project would not generate solid waste in excess of State or local standards, and would comply with all federal, State, and local management statutes and regulations. The project would not impair the attainment of solid waste reduction goals. Therefore, impacts to solid waste would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

This page intentionally left blank.

20 Wildfire

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than - Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	■
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	■
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 downslopes or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	■

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 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 downslopes or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

The project site is in an urbanized area of Downtown Fresno surrounded by commercial and industrial uses. Undeveloped wildland areas are not located near the project site and the proposed project would not alter evacuation routes as none are near the project site. According to CAL FIRE, the project site is not located within a designated VHFHSZ nor located within a State Responsibility Area (SRA) (CAL FIRE 2025). The nearest designated VHFHSZ is located approximately 16 miles northeast of the project site. As such, project implementation would not interfere with existing emergency evacuation plans or emergency response plans within a FHSZ or state responsibility area; exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire; require the installation or maintenance of associated infrastructure within a FHSZ or state responsibility area; or expose people or structures to significant risks, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. No impact would occur.

NO IMPACT

21 Mandatory Findings of Significance

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than - Significant Impact	No Impact
Does the project:				
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?	☐	■	☐	☐

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?

As discussed under Section 4, *Biological Resources*, the project site does not include any mapped essential habitat connectivity areas in the immediate vicinity of the project site. Regional wildlife movement is restricted due to the urbanized nature of the project site. As such, no native resident or migratory fish or wildlife species, established native resident or migratory wildlife corridors, or native wildlife nursery sites exist on the project site. Furthermore, there is no suitable habitat for special-status species on the site. As noted under Section 4, *Biological Resources,* the project may affect nesting birds. However, implementation of Mitigation Measure BIO-1 would reduce impacts to a less-than-significant level by requiring nesting bird surveys.

As discussed under Section 5, *Cultural Resources*, archival research indicates a high potential for intact historic-period archaeological deposits beneath existing roadways and the project intersects two built environment historic districts the Fresno Nihonmachi and Fresno Chinatown districts but would not result in direct physical impacts to contributing buildings. Potential vibration impacts to these structures would be reduced to a less-than-significant level with implementation of Mitigation Measure NOI-1. Archaeological resources, including both evaluated and unevaluated sites, could be directly or indirectly impacted by ground-disturbing activities. However, with Mitigation Measures CUL-1 through CUL-4 impacts would be reduced to a less-than-significant level by requiring archaeological monitoring, archaeological resources treatment planning, and data recovery. Although no human remains are known to exist on-site, compliance with applicable state laws would ensure any inadvertent discoveries are handled appropriately. Therefore, the project would not eliminate important examples of California history or prehistory and impacts would be less than significant with mitigation.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

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)?

Cumulative impacts are defined as two or more individual (and potentially less than significant) project effects which, when considered together or in concert with other projects, combine to result in a significant impact within an identified geographic area. Cumulatively considerable impacts could occur if the construction of other projects occurs at the same time as the proposed project and in the same vicinity, such that the effects of similar impacts of multiple projects combine to expose adjacent sensitive receptors to greater levels of impact than would occur under the proposed project. For example, if the construction of other projects in the area occurs at the same time as construction of the proposed project, potential impacts associated with biological resources, cultural resources, geology and soils, and hazards and hazardous materials in the project site may be more substantial.

As discussed under Sections 1 through 20, the project would have no impact, a less than significant impact, or a less than significant impact with mitigation incorporated, with respect to all environmental issues. Mitigation measures would be implemented for biological resources, cultural resources, geology and soils, hazards and hazardous materials, noise, and tribal cultural resources.

Aesthetics

The project would not cause any substantial changes from the views at and around the project site and therefore would not cause a substantial adverse effect on existing scenic vista, viewshed, state-scenic highway, or designated scenic resource. Because the project would have no impact on aesthetics, the project's aesthetic impacts would not be cumulatively considerable.

Agriculture and Forestry Resources

The project would have no impact on agricultural resources. Therefore, there is no potential for the project to contribute to a cumulatively considerable impact under this topic.

Air Quality

Based on SCAQMD guidance, any direct exceedance of a regional or localized threshold also is considered to be a cumulatively considerable effect, while air pollutant emissions below applicable regional and/or localized thresholds are not considered cumulatively considerable. As discussed in Section 3, *Air Quality*, the project would not exceed SCAQMD's regional threshold for criteria pollutants during construction or operation of the project. Therefore, project-related construction and operation emissions would not be cumulatively considerable.

Other individual projects in the vicinity of the proposed project could be under construction at the same time. Depending on the timing and implementation of these projects within the project vicinity, construction activities may generate fugitive dust and pollutant emissions, resulting in short-term contributions to cumulative air quality impacts. However, each project would be required to comply with applicable SJVAPCD rules, regulations, and applicable project specific mitigation measures during construction, which would reduce emissions. Therefore, project-related construction and operation emissions would not be cumulatively considerable. Biological Resources

The project site does not support any sensitive plant or wildlife species, riparian, or sensitive natural habitat, or federally protected wetlands; therefore, there is no potential for the project to contribute to a cumulatively considerable impact under these resources. Although the project site is highly disturbed and fragmented from other open space areas under existing conditions, there remains potential for nesting birds adapted to urban and disturbed environments to occur on or near the site prior to construction. In combination with other development in the area, the loss of potential nesting habitat could result in cumulatively considerable impacts to migratory nesting birds. Mitigation Measure BIO-1 would require pre-construction surveys and nesting bird avoidance and protecting measures to ensure the proposed project would not impact nesting birds, consistent with state and federal protections for nesting birds. These measures would ensure that the project avoids direct impacts to nesting birds and does not contribute to a significant cumulative impact. With implementation of Mitigation Measure BIO-1, potential cumulative impacts to special status bird species and nesting birds would be reduced to less than significant levels.

Cultural Resources

The project site is located in a historically sensitive area with a high potential for encountering intact archaeological resources beneath existing roadways. As discussed in Section 5, *Cultural Resources*, the project could impact archaeological resources. Other projects in the vicinity may also involve ground-disturbing activities that could impact similar resources. When considered together, these activities have the potential result in cumulatively considerable impacts to cultural resources. However, implementation of Mitigation Measures CUL-1 through CUL-4 would reduce impacts to less than significant. These measures include:

- CUL-1: Retention of a Qualified Archaeologist to oversee all cultural resources work, confirming professional standards are met.
- CUL-2: Preparation and implementation of an Archaeological Resources Treatment Plan (ARTP), which includes avoidance strategies, data recovery for scientifically significant resources, and interpretive/educational components to preserve historical context.
- CUL-3: A Cultural Resources Monitoring Plan (CRMP) that outlines procedures for archaeological monitoring, worker training, inadvertent discovery protocols, and coordination with Native American representatives.

- CUL-4: Active archaeological monitoring during all ground-disturbing activities to identify and avoid impacts to known and unknown resources.

Together, these measures ensure that any impacts to cultural resources are either avoided or mitigated through documentation, recovery, and public interpretation. This approach not only protects individual resources but also preserves the integrity of the broader historical/cultural landscape. Therefore, the project would not result in a cumulatively considerable impact on cultural resources.

Energy

The project's construction and operation energy consumption would not be considered inefficient, wasteful, or otherwise unnecessary and would not obstruct a State or local plan for renewable energy or energy efficiency. In addition, all cumulative projects would be required to comply with Title 24, which establishes standards for energy efficiency and "green" construction. Therefore, implementation of the project would not result in a cumulatively considerable impact on energy.

Geology and Soils

Future development in the cumulative project area would generally consist of infill projects involving varying degrees of ground disturbance. However, potential effects related to geology and soils are inherently site-specific; therefore, there is no potential for the project to contribute to a cumulatively considerable impact under this topic. Furthermore, all development proposals would be required to comply with applicable federal, State, and local regulations that are in place to preclude adverse geology and soils effects, including effects related to strong seismic ground shaking, fault rupture, soil erosion, and hazardous soil conditions (e.g., liquefaction, expansive soils, landslides).

Because paleontological resources are non-renewable and can be widespread across geologic formations, their disturbance from multiple projects could result in a cumulatively considerable loss of scientific data. Therefore, there is remote potential that paleontological resources are buried beneath the surface of the project site and could be impacted during construction. Other projects within region would similarly have the potential to impact unknown, subsurface paleontological resources during ground-disturbing activities. Therefore, the potential for development on the project site to impact subsurface paleontological resource deposits is a cumulatively considerable impact. With implementation of Mitigation Measure GEO-1, potential cumulative impacts to paleontological resources would be reduced to less than significant levels.

Greenhouse Gas Emissions

GHG emissions are inherently cumulative because a single project is unlikely to have a significant impact on global climate change on its own. The CEQA Guidelines also emphasize that the effects of GHG emissions are cumulative and should be analyzed in the context of CEQA's requirements for cumulative impacts analysis (see *CEQA Guidelines* Section 15130[f]). Accordingly, the analysis in Section 8, *Greenhouse Gas Emissions*, reflects a cumulative impact analysis of the GHG emissions related to the project. As concluded under threshold 8.a and 8b, the project would not result in a cumulatively considerable impact related to GHG emissions.

Hazards and Hazardous Materials

Potential effects related to hazards and hazardous materials are inherently site-specific; therefore, the project would not contribute to a cumulatively considerable impact under this topic. It is anticipated that future growth in the cumulative project area would result in an incremental increase in the quantity of hazardous materials used, treated, transported, and disposed area wide. Cumulative projects would be required to comply with safety procedures mandated by applicable federal, State, and local laws and regulations related the transport, use, and disposal of hazardous materials, contaminated soil, or groundwater related to hazardous materials sites. Implementation of Mitigation Measure HAZ-1, which requires a Soil Management Plan, would reduce the potential construction impacts related to unknown hazardous substance releases to a less-than-significant level. Therefore, a cumulatively considerable impact would not occur.

Hydrology and Water Quality

Construction and operation of the project and other projects in Downtown Frenso would have the potential to result in cumulative surface water quality and drainage impacts, including erosion and sedimentation. However, in accordance with applicable federal, State, and local regulations, all development projects would be required to implement plans during construction and operation (e.g., SWPPP and NPDES) to minimize adverse effects to water quality and drainage, which would avoid a cumulatively considerable impact.

Additionally, all projects within Downtown Fresno would be required to comply with federal, State, and local regulations in order to preclude flood hazards both on- and off-site. Compliance with regulations would require on-site areas to be protected, at a minimum, from flooding during peak storm events (i.e., 100-year storm) and that proposed development would not expose downstream properties to increased flooding risks during peak storm events. Accordingly, a cumulatively considerable effect related to flooding would not occur.

Land Use and Planning

The project would not physically divide an established community, or conflict with applicable land use or planning documents. Therefore, the project would not contribute to a cumulatively considerable impact related to land use and planning.

Mineral Resources

The project would have no impact on mineral resources. Therefore, there is no potential for the project to contribute to a cumulatively considerable impact under this topic.

Noise

Noise is typically localized and rapidly attenuates within an urban environment; therefore, the geographic scope of cumulative noise impacts could be limited to within 1,000 feet of the project site. Beyond this distance, impulse noise may be briefly audible, but steady noise from the project would generally dissipate such that the project would not contribute to the cumulative noise environment.

Implementation of Mitigation NOI-1 would require that use of a static roller in lieu of a vibratory roller is used within 37 feet of historic buildings to reduce construction-related vibration impacts to historical buildings and features. As detailed in Section 13, *Noise*, with implementation of Mitigation Measure NOI-1, the proposed project would not generate excessive groundborne vibration or noise.

Therefore, the project would not contribute to any cumulatively considerable noise or vibration impacts.

Population and Housing

The project would not involve residential components which would directly generate population increase. As detailed under Section 6, *Project Characteristics*, funding for this project has been secured through the IIGC Grant which is intended to fund water and sewer infrastructure upgrades to support infill housing development, as planned for within numerous adopted long-range plans. Thus, the proposed project would indirectly induce population growth within the Downtown Fresno area. However, this housing and corresponding population growth supported by the proposed project would be consistent with the planned growth of adopted City plans. The project would not generate unplanned new residents and would not require the construction of replacement housing. Accordingly, the project would not contribute to an adverse, cumulatively considerable environmental effect related to population and housing.

Public Services

All development projects in Fresno, including the proposed project, would require compliance with applicable policies and ordinances for fire prevention, protection, and safety. The project will not increase the demand for police protection services, fire protection services, or new schools. Therefore, the project would not contribute to cumulatively considerable impacts to resident-serving public facilities such as schools, parks, libraries, and other public facilities or services.

Recreation

The project would not increase the usage of or demand for neighborhood and regional parks or other recreational facilities. Therefore, the project would not contribute to a cumulatively considerable impact.

Transportation

As detailed in Section 17, *Transportation*, the proposed project would not conflict with a plan, policy, or ordinance addressing circulation nor would the project conflict with CEQA Guidelines Section 15064.3, subdivision (b). Cumulative projects would be subject to design review to ensure the project would not increase hazards due to a geometric design feature or incompatible use. Additionally, all projects would be required to implement a traffic control plan to ensure emergency access to the project site throughout construction activities. Therefore, the project would not contribute to any cumulatively considerable adverse transportation effects.

Tribal Cultural Resources

Construction and operation of the proposed project would not impact any known tribal cultural resources. However, there is the remote potential that such resources are buried beneath the surface of the project site and could be impacted during construction. Other projects within the region would similarly have the potential to impact unknown, subsurface tribal cultural resources during ground-disturbing activities. Therefore, the potential for development on the project site to impact subsurface tribal cultural resources deposits is a cumulatively considerable impact. However, application of Mitigation Measure CR-3 would reduce the project's cumulative impacts to a less-than-significant level.

Utilities and Service Systems

Cumulative development and redevelopment in the Downtown Fresno area would incrementally contribute to increased demand on water, wastewater, and solid waste systems. Development of public utility infrastructure is part of an extensive planning process involving utility providers and jurisdictions with discretionary review authority. The coordination process associated with the preparation of infrastructure plans is intended to ensure that adequate public utility services and resources are available to serve cumulative, long-term growth in the region. The proposed project, for example, will provide enhanced water and sewer capacity and reliability within the Downtown Fresno area in order to accommodate infill housing. Because of the utility planning and coordination activities described above, the project would not contribute to cumulatively considerable impacts to utilities and service systems.

Wildfire

The project site is not within an SRA or VHFHSZ according to CALFIRE. In accordance with applicable State and local regulations, all development projects would be required to be constructed to meet the current building code fire safety requirements, including the 2022 CBC and the California Fire Code to minimize adverse effects to wildfire risk, which would avoid a cumulatively considerable impact. Therefore, the project would not contribute to an adverse cumulative impact associated with wildfire.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

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

In general, impacts to human beings are associated with air quality, hazards and hazardous materials, and noise. As detailed in Section 3, *Air Quality*, the project would not result, either directly or indirectly, in adverse hazards related to air quality. As discussed in Section 9, *Hazards and Hazardous Materials,* Mitigation Measure HAZ-1 would be required to ensure the proposed project would not expose the public or the environment to hazardous materials. Compliance with applicable rules and regulations and recommended mitigation measures would reduce potential impacts on human beings to a less-than-significant level.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

This page intentionally left blank.

References

Bibliography

California Department of Conservation (DOC). 2025a. California Important Farmland Finder. Available: https://maps.conservation.ca.gov/dlrp/ciff/app/. Accessed April 2025

California Department of Finance (DOF). 2024. E-5 Population and Housing Estimates for Cities, Counties, and the State, 2020-2024. https://dof.ca.gov/forecasting/demographics/estimates/e-5-population-and-housing-estimates-for-cities-counties-and-the-state-2020-2024/. Accessed April 2025.

California Department of Forestry & Fire Protection (CAL FIRE). 2025. Fire Hazard Severity Zones Maps. https://experience.arcgis.com/experience/03beab8511814e79a0e4eabf0d3e7247/. Accessed April 2025.

_____. 2025b. California Williamson Act Enrollment Finder. https://maps.conservation.ca.gov/dlrp/WilliamsonAct/App/index.html. Accessed April 2025.

California Department of Resources Recycling and Recovery (CalRecycle). 2025a. SWIS Facility/Site Activity Details. https://www2.calrecycle.ca.gov/SolidWaste/Site/Search. Accessed May 2025.

_____. 2025b. Transported Solid Waste. https://www2.calrecycle.ca.gov/LGCentral/DisposalReporting/Statewide/TransportedSolidWaste. Accessed May 2025.

California Department of Transportation (Caltrans). 2013. *Technical Noise Supplement to the Traffic Noise Analysis Protocol*. (CT-HWANP-RT-13-069.25.2) http://www.dot.ca.gov/hq/env/noise/pub/TeNS_Sept_2013B.pdf. Accessed May 2025.

_____. 2025. California State Scenic Highway System Map. https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa. Accessed April 2025.

California Geological Survey (CGS). 2025. Earthquake Zones of Required Investigation. https://maps.conservation.ca.gov/cgs/EQZApp/app/. Accessed May 2025.

Crocker, Malcolm J. 2007. *Handbook of Noise and Vibration Control*, John Wiley & Sons. Accessed October 2019.

Federal Highway Administration (FHWA). 2017. *Highway Traffic Noise Analysis and Abatement Policy and Guidance.* August 24. Accessed May 2025.

Federal Transit Administration (FTA). 2018. *Transit Noise and Vibration Impact Assessment.* November. 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. Accessed May 2025.

Fresno, City of. 2011. Downtown Development Code. https://www.fresno.gov/wp-content/uploads/2023/04/AppCDDCASMBLD.pdf. Accessed July 2025.

_____. 2014. Fresno General Plan Noise and Safety Element. https://www.fresno.gov/wp-content/uploads/2023/03/9-Noise-and-Safety-02-03-21.pdf. Accessed July 2025.

_____. 2016a. Downtown Neighborhoods Community Plan. https://www.fresno.gov/wp-content/uploads/2023/04/161020DNCPFinallowres1.pdf. Accessed July 2025.

_____. 2016b. Fulton Corridor Specific Plan. https://www.fresno.gov/wp-content/uploads/2023/04/161020FCSPFinallowres1.pdf. Accessed July 2025.

_____. 2021. 2020 Urban Water Management Plan (UWMP). https://www.fresno.gov/wp-content/uploads/2023/03/Fresno-2020-UWMP_Final_2021-07-21.pdf. Accessed July 2025.

_____. 2024. General Plan. https://www.fresno.gov/wp-content/uploads/2023/03/upload_temp_Consolidated-GP-10-13-2022_compressed.pdf. Accessed April 2025.

_____. 2025a. Fresno Code of Ordinances. https://library.municode.com/ca/fresno/codes/code_of_ordinances. Accessed May 2025.

_____. 2025b. Sewer & Wastewater. https://www.fresno.gov/publicutilities/sewer-wastewater/#fast-facts. Accessed July 2025.

_____. 2025c. Water Division. https://www.fresno.gov/publicutilities/water-division/#fast-facts. Accessed July 2025.

Fresno Council of Governments (FCOG). 2018. Fresno County Airport Land Use Compatibility Plan. https://www.fresnocog.org/wp-content/uploads/2019/01/fresno-draft-ALUCP-12-04-17c.pdf. Accessed May 2025.

_____. 2022. FCOG 2022 Regional Transportation Plan. https://www.planfresno.com/sustainable-communities-strategies-fall-outreach/. Accessed July 2025.

_____. 2024. Fresno Multi-Jurisdictional 2023-2031 Housing Element. https://www.fresno.gov/wp-content/uploads/2025/01/Fresno-Multi-Jurisdictional-2023-2031-Housing-Element.pdf. Accessed July 2025.

Fresno, County of. 2000. General Plan Background Report. https://www.fresnocountyca.gov/files/sharedassets/county/v/1/vision-files/files/8398-background_report_june04.pdf. Accessed April 2025.

_____. 2018. Fresno County Multi-Jurisdictional Hazard Mitigation Plan. https://www.fresno.gov/wp-content/uploads/2023/03/FresnoCountyHMPFinal.pdf. Accessed May 2025.

Fresno Metropolitan Flood Control District (FMFCD). 2016. Inundation Depth Map Sunny Day Hypothetical Failure of Big Dry Creek Dam. https://fresnometroh2o.com/dams/inundation-mapping/. Accessed June 2025.

United States Geological Survey (USGS). 2025. Area of Land Subsidence in California. https://ca.water.usgs.gov/land_subsidence/california-subsidence-areas.html. Accessed June 2025.

List of Preparers

Rincon Consultants, Inc. prepared this IS-MND under contract to the City of Fresno. Persons involved in data gathering analysis, project management, and quality control are listed below.

Rincon Consultants, Inc.

Rosalyn Prickett, Principal in Charge
Katherine Fikan, Project Manager
Lillie Colville, Assistant Project Manager
May Lau, Biological Resources Principal
Lisa Achter, Senior Supervising Biologist
Alana Garza, Biologist
Monica Strauss, Senior Cultural Resources Principal
Leanna Flaherty, Senior Archaeologist
Savanna Vrevich, Senior Environmental Scientist
Jessie Jaeger, Air Quality Specialist
Jesse McCandless, Noise Specialist
Maya Lara, Environmental Planner

This page intentionally left blank.

Appendix A

CalEEMod Outputs

Appendix B

Biological Resources Technical Memorandum

Appendix C

Cultural Resources Technical Memorandum

Appendix D

Noise Inputs and Outputs