APPENDIX G/INITIAL STUDY FOR A MITIGATED NEGATIVE DECLARATION

Environmental Checklist Form for:
Development Permit Application No. P23-00702, Annexation No. P23-00446, and Pre-zone No. P23-00449

1.	**Project title:** Development Permit Application No. P23-00702, Annexation No. P23-00446, and Pre-zone No. P23-00449
2.	**Lead agency name and address:** City of Fresno Planning and Development Department 2600 Fresno Street Fresno, CA 93721
3.	**Contact person and phone number:** Thomas Veatch, Planner III City of Fresno Planning and Development Department (559) 621-8076
4.	**Project location:** Proposed 10.55-acre Annexation Site: 7819, 7835, and 7853 North Willow Avenue; 2895 and 2991East Nees Avenue. Proposed approximately 3.3-acre Development Site: 7819 and 7835 North Willow Avenue. APN: 404-481-19S, 404-481-20S (parcels to be developed), 404-550-29S, 404-550-27S, 404-550-28S (parcels to remain unchanged).
5.	**Project sponsor's name and address:** Opek Investments, LLC 1900 Shaw Avenue, Suite 101 Clovis, CA 93611
6.	**General & Community plan land use designation:** Commercial Community (CC)[1]
7.	**Zoning:** Annex–Pre-Zoned Commercial Community (CC)

[1] City of Fresno. 2022. Official General Plan Land Use and Circulation Map.

8.	**Description of project:** Annexation Application No. P23-00446 was filed by Devin Tienken of Legacy Construction on behalf of Children's Dentistry and Orthodontics and pertains to ±10.55 acres of property (total acreage of subject properties, plus County right of way from property line of the subject properties to the centerline of street) generally located on the southwest corner of East Nees and North Willow Avenues. The applicant requests authorization to initiate annexation proceedings for the Nees-Willow No. 3 Reorganization proposing incorporation of the subject properties within the City of Fresno, and detachment from the Kings River Conservation District and Fresno County Fire Protection District. Existing land uses within the proposed Annexation area include three single-family residences, totaling approximately 5.88 acres, and the approximately 3.3-acre, unimproved site proposed for development. 1.37 acres of public street right of way border the properties and will be included in the Annexation. The three properties with existing single family homes are not proposed for new development, but are included in the scope of the annexation in order to not leave a remainder portion of the County island. Two single-family residences were removed from the proposed Development site sometime between 2020 and 2022.[2] Pre-zone Application No. P23-00449 proposes to pre-zone: ±5.88 acres of the subject properties from the Fresno County AL20 (Limited Agriculture) zone district to the City of Fresno CC/ANX (Community Commercial/Annexed Rural Residential Transitional Overlay) zone district; and, ±3.30 acres of the subject properties from the Fresno County AL20 (Limited Agriculture) zone district to the City of Fresno CC (Community Commercial) zone district. Development Permit Application No. P23-00702 (Development) was filed by iT Architecture Inc on behalf of Children's Dentistry and Orthodontics and pertains to ±3.30 acres of property at 7819 and 7835 North Willow Avenue (APN's: 404-481-19S, 20S). The application proposes two (2) ±11,160 square-foot buildings with a height of 25 feet, and one (1) ±11,780 square-foot building with a height of 25 feet, to be utilized for medical, dental, and/or professional offices. The Development will also include parking, landscaping, and associated site improvements. Access to the site will consist of two vehicle driveways to the east along North Willow Avenue, and two vehicle driveways to the south along the unnamed existing alleyway. The Development proposes to include 166 onsite standard and ADA parking stalls.

[2] Historical Aerials, 2020: https://www.historicaerials.com/viewer/ and Google Earth, 6/10/2022: https://earth.google.com/web/@36.85301661,-119.72975944,107.96335053a,1574.54944538d,35y,-0h,0t,0r/data=OgMKATA.

	As stated above, the proposed Development site is located within an approximately 10.55-acre unincorporated County "island" proposed for annexation by the City of Fresno (City) that is bounded by the City on the north, west, and south, and the City of Clovis on the east. The proposed Annexation Property is currently designated Commercial Community in the Fresno Official General Plan Land Use and Circulation Map, and is pre-zoned Commercial Community, as designated in the General Plan, in anticipation of annexation approval by the City. According to Fresno Municipal Code Section 15-6103(C)(2), "Property that is subject to annexation shall be pre-zoned consistent with the General Plan, Concept Plan if applicable, and any applicable operative plan per Fresno Municipal Code Section 15-6104, Annexation Criteria."
9.	**Surrounding land uses and setting:**

	Planned Land Use	Existing Zoning	Existing Land Use
North	Commercial Community	Commercial Community	Commercial/Retail Center
East	P-C-C Planned Commercial Center (City of Clovis)	P-C-C Planned Commercial Center (City of Clovis)	Commercial/Retail Center (City of Clovis)
South	RS-4 Medium Low-Density Residential	RS-4 Medium Low-Density Residential	Church Institutional
West	RS-4 Medium Low-Density Residential	RS-4 Medium Low-Density Residential	Single-Family Residential Tract

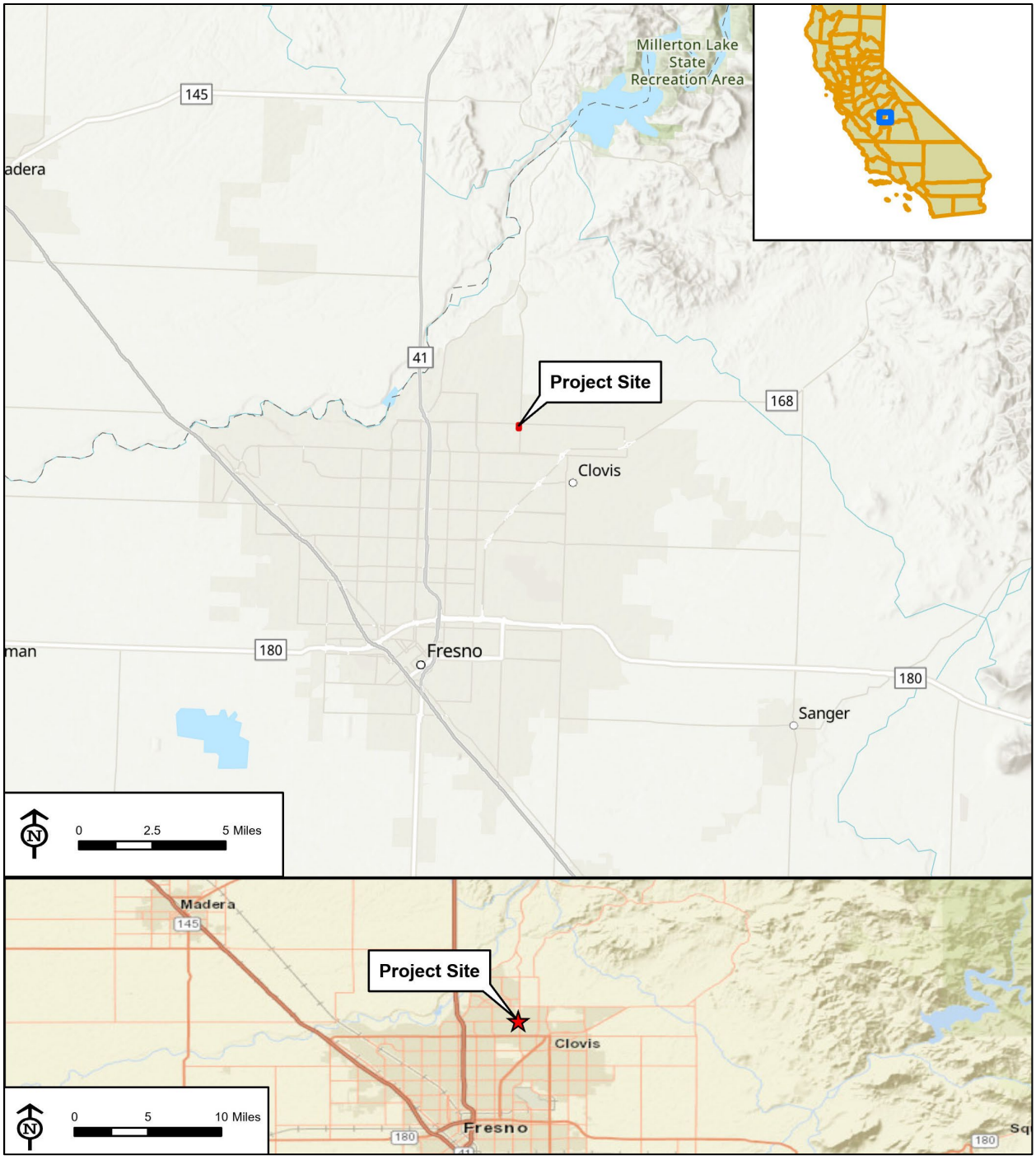


Figure 1–Regional Project Location



Figure 2–Aerial Photograph of the Annexation Property/Development Site

10.	**Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement):** • City of Fresno Fire Department (FFD) - Review Project development application and provide comments and recommend conditions of approval to ensure that adequate on-site and off-site fire protection systems and features are provided; • City of Fresno Department of Public Utilities (DPU) - Review Project development application to facilitate compliance with requirements for the provision and maintenance of water, wastewater, solid waste systems; • City of Fresno Department Public Works (DPW) - Review Project development application and construction plans and provide inspection services to ensure the correct installation of all infrastructure (water/sewer lines, street lights, sidewalks, and roadways); • Fresno Metropolitan Flood Control District (FMFCD) - Review Project development application and plans for grading, street improvements, and storm drains to ensure consistency with the FMFCD's Storm Drainage and Flood Control Master Plan; • Regional Water Quality Control Board (RWQCB) - Construction activities would be required to be covered under the National Pollution Discharge Elimination System (NPDES); RWQCB - The Storm Water Pollution Prevention Plan (SWPPP) would be required to be approved prior to construction activities pursuant to the Clean Water Act; • San Joaquin Valley Air Pollution Control District (SJVAPCD) - Construction (grading) activities would be subject to the SJVAPCD permits, codes, and requirement.
11.	**Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code (PRC) Section 21080.3.1? If so, has consultation begun?** The State requires lead agencies to consider the potential effects of proposed projects and consult with California Native American tribes during the local planning process for the purpose of protecting Traditional Tribal Cultural Resources through the California Environmental Quality Act (CEQA) Guidelines. Pursuant to PRC Section 21080.3.1, the lead agency shall begin consultation with the California Native American tribe(s) that is traditionally and culturally affiliated with the geographical area of the proposed project. Such significant cultural resources are either sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a tribe which is either on or eligible for inclusion in the California Historic Register or local historic register, or, the lead agency, at its discretion, and support by substantial evidence, choose to treat the resources as a Tribal Cultural Resources (PRC Section 21074(a)(1-2)). According to the most recent census data, California is home to 109 currently recognized Indian tribes. Tribes in California currently have nearly 100 separate reservations or Rancherias. Fresno County has a number of Rancherias such as Table Mountain

	Rancheria, Millerton Rancheria, Big Sandy Rancheria, Cold Springs Rancheria, and Squaw Valley Rancheria. These Rancherias are not located within the city limits. Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process (see PRC Section 21083.3.2.) Information may also be available from the California Native American Heritage Commission's (NAHC) Sacred Lands File (SLF) per PRC Section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that PRC Section 21082.3(c) contains provisions specific to confidentiality. Bargas Environmental Consulting (Bargas) contacted the NAHC on August 31, 2022, requesting a search of the SLF (Appendix C–Cultural Resources Assessment, Attachment B). Bargas received a response from the NAHC on October 28, 2022, stating the SLF search was negative. However, the NAHC noted that while the results are negative this does not guarantee the absence of cultural resources within the Project Area of Potential Impacts (API). The NAHC provided a list of Native American tribes and representatives that may have knowledge of cultural resources within the area. Currently, the Table Mountain Rancheria Tribe and the Dumna Wo Wah Tribe have requested to be notified pursuant to Assembly Bill (AB) 52. A certified letter was mailed to the above mentioned tribes on ***May 3, 2024.*** The 30-day comment period ended on ***June 3, 2024.*** Neither tribe requested consultation.

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

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

DETERMINATION: (To be completed by the Lead Agency)

On the basis of this initial evaluation:

___	I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
_X_	I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
___	I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT (EIR) is required.
___	I find that the proposed project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An EIR is required, but it must analyze only the effects that remain to be addressed.
___	I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed

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

Thomas Veatch 10/31/2025

Planner Name, Title Date

1. For purposes of this Initial Study, the following answers have the corresponding meanings:

   a. “No Impact” means the specific impact category does not apply to the project, or that the record sufficiently demonstrates that project specific factors or general standards applicable to the project would result in no impact for the threshold under consideration.

   b. “Less Than Significant Impact” means there is an impact related to the threshold under consideration, but that the potential impact would be less than significant.

   c. “Less Than Significant with Mitigation Incorporation” means there is a potentially significant impact related to the threshold under consideration, however, with the mitigation incorporated into the project, the impact would be less than significant.

   d. “Potentially Significant Impact” means there is substantial evidence that an effect resulting from the proposed project may be significant related to the threshold under consideration.

2. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

3. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

4. Once the lead agency has determined that a particular physical impact may occur,

then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

5. "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from, "Earlier Analyses," as described in (6) below, may be cross-referenced).

6. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:

    a. Earlier Analysis Used. Identify and state where they are available for review.

    b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

    c. Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

7. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

8. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

9. The explanation of each issue should identify:

    a. The significance criteria or threshold, if any, used to evaluate each question; and

    b. The mitigation measure identified, if any, to reduce the impact to less than

significance.

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

Environmental Setting

Scenic resources include natural or manmade features such as trees, rock outcroppings, and historic buildings that contribute to the visual character of a site or corridor, particularly those visible from public viewpoints or located within designated scenic highways. The potential for substantial adverse effects on these resources must be evaluated in the context of a project's setting and the visual sensitivity of the surrounding

area. Aesthetic impacts may be significant where the project may adversely affect scenic vistas, scenic highways, or other recognized visual resources.[3]

The proposed Annexation Property is located in an urbanized area currently improved with three single-family residences, bounded by a commercial shopping center to the north across Nees Avenue, single-family residences to the west, a church to the south, and a commercial shopping center to the east across Willow Avenue.

The proposed Development site is a highly disturbed unimproved lot located in the southern portion of the Annexation Property that was previously occupied with two single-family residences. The Development site is relatively flat with elevations ranging from approximately 358 feet above mean sea level (amsl) to approximately 364 feet amsl.

DISCUSSION

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

No impact. The General Plan[4] designates several vista points in the City of Fresno, all located along the San Joaquin River. In addition, Article 15 of the Fresno Municipal Code provides protection for the San Joaquin River bluffs to, in part, protect the natural and scenic qualities of the river bluffs. The San Joaquin River is located approximately 3.60 miles northwest of the Project site and is not visible from the Project site.

Additionally, the General Plan designates the following as scenic corridors:

- Van Ness Boulevard – Weldon to Shaw Avenues
- Van Ness Extension – Shaw Avenue to the San Joaquin River Bluff
- Kearney Boulevard – Fresno Street to Polk Avenue
- Van Ness-Fulton couplet – Weldon Avenue to Divisadero
- Butler Avenue – Peach to Fowler Avenues
- Minnewawa Avenue – Belmont Avenue to Central Canal
- Huntington Boulevard – First Street to Cedar Avenue
- Shepherd Avenue – Friant Road to Willow Avenue
- Audubon Drive – Blackstone to Herndon Avenues
- Friant Road – Audubon to Millerton Roads
- Tulare Avenue – Sunnyside to Armstrong Avenues
- Ashlan Avenue – Palm to Maroa Avenues.

Figure MT-1 of the Fresno General Plan shows the closest Scenic Corridor to the Project

[3] Cal. Code Regs., tit. 14, Appendix G–Aesthetics.

[4] City of Fresno. 2014. Fresno General Plan. Figure MT-2.

site to be Audubon Drive approximately 2.44 miles west of the Development and Project site.

Consequently, because there are no scenic vistas or vista points within a viewable distance of the Project site, and because the Development would not obstruct views of designated Scenic Corridors, nor impair the scenic qualities of the San Joaquin River bluffs, the proposed Project would have **no impact** on a scenic vista or scenic resource.

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

No Impact. The proposed Project is not located within or in the vicinity of a state scenic highway. Review of the California Department of Transportation (Caltrans) State Scenic Highway System Map indicates there are no eligible or officially designated State Scenic Highways in the vicinity of the proposed Project site. The nearest eligible highway is a portion of SR 168 approximately 1.6 miles southeast of the Project. The nearest officially designated State Scenic Highway is Route 180 in eastern Fresno County, approximately 19 miles southeast of the Project site near Minkler, California. Therefore, the proposed Project would have **no impact** on scenic resources within a state scenic highway.

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

No impact. The proposed Project site is located in an urbanized area, surrounded by residential, institutional, and commercial land uses. The proposed Development site would be improved with office and medical building land uses, which is consistent with the Commercial Community land use designation and zoning. Therefore, the proposed Project would have **no impact** on applicable zoning or other regulations governing scenic quality.

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

Less than significant impact with mitigation incorporated. The Project Applicant indicates that no construction will occur at night requiring lighting. However, although no new lighting sources would occur from the remaining single-family residences in the proposed Annexation Property, operation of the proposed Development would result in new lighting within the Development site consistent with surrounding residential and commercial development. New lighting sources from the Development would include interior and exterior lighting, security lighting, and vehicle lights. Outdoor and landscape

lighting would be governed by the Fresno Municipal Code (FMC) Sections 15-2015–Outdoor Lighting and Illumination, 15-2420–Parking Area Lighting, and 15-2508–Lighting and Glare, which would ensure that potential impacts to day or nighttime views in the area due to excessive light and/or glare resulting from the proposed Development would be less than significant. Also, the Development would comply with **Mitigation Measures AES-1**, **AES-2**, **AES-3,** and **AES-4,** which provide guidelines for outdoor lighting and building materials. While the Development will create new light sources within the local area, all lighting will be consistent with the City General Plan and the FMC. In addition, lighting standards will be imposed through conditions of approval, and by compliance with the mitigation measures listed below through a Mitigation Monitoring and Reporting Program. Therefore, the proposed Project would result in a **less than significant impact with mitigation incorporated** for new sources of substantial light or glare.

Mitigation Measures

MM AES-1: Lighting systems for street and parking areas shall include shields to direct light to the roadway surfaces and parking areas. Vertical shields on the light fixtures shall also be used to direct light away from adjacent light sensitive land uses such as residences.

MM AES-2: Lighting for Non-Residential Uses. Lighting systems for non- residential uses, not including public facilities, shall provide shields on the light fixtures and orient the lighting system away from adjacent properties. Low intensity light fixtures shall also be used if excessive spillover light onto adjacent properties will occur.

MM AES-3: Signage Lighting. Lighting systems for freestanding signs shall not exceed 100 foot Lamberts (FT-L) when adjacent to streets which have an average light intensity of less than 2.0 horizontal footcandles and shall not exceed 500 FT-L when adjacent to streets which have an average light intensity of 2.0 horizontal footcandles or greater.

MM AES-4: Materials used on building facades shall be non-reflective.

The proposed Project shall implement and incorporate the aesthetics related mitigation measures as identified in the attached Project Specific Mitigation Monitoring Checklist dated April 23, 2025.

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
II. AGRICULTURE AND FORESTRY RESOURCES – In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				X
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?				X
c) Conflict with existing zoning for, or cause rezoning of, 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))?				X
d) Result in the loss of forest land or conversion of forest land to non-forest use?				X

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?			X	

Environmental Setting

California Farmland Mapping and Monitoring Program

In 1982, the California State Legislature established the California Department of Conservation Farmland Mapping and Monitoring Program (FMMP) to assess the quality, quantity, and location of agricultural lands within California. The FMMP additionally monitors the conversion of these agricultural lands over time. Specifically, it is a non-regulatory program contained in Section 612 of the PRC. The program established seven land use categories with the purpose of providing consistent and impartial analysis of agricultural land use and change throughout California. The land use categories under the FMMP are as follows: [5]

1. *Prime Farmland (P)* – This category consists of the best combination of physical and chemical features able to sustain long-term agricultural production. Irrigated agricultural production is a necessary land use four years prior to the mapping date to qualify as Prime Farmland. The land must be able to store moisture and produce high yields.
2. *Farmland of Statewide Importance (S)* - Farmland similar to Prime Farmland but with minor shortcomings, such as greater slopes or less ability to store soil moisture. Land must have been used for irrigated agricultural production at some time during the four years prior to the mapping date.
3. *Unique Farmland (U)* – Farmland of lesser quality soils used for the production of the state's leading agricultural crops. This land is usually irrigated, but may include

[5] California Department of Conservation. Important Farmland Categories. https://www.conservation.ca.gov/dlrp/fmmp/Pages/Important-Farmland-Categories.aspx. Accessed April 2025.

non-irrigated orchards or vineyards as found in some climatic zones in California. Land must have been cropped at some time during the four years prior to the mapping date.

4. *Farmland of Local Importance (L)* – Land of importance to the local agricultural economy as determined by each county's board of supervisors and a local advisory committee.
5. *Grazing Land (G)* – Land on which the existing vegetation is suited to the grazing of livestock.
6. *Urban and Built-up Land* (D) – Land occupied by structures with a building density of at least 1 unit to 1.5 acres, or approximately 6 structures to a 10-acre parcel.
7. *Other Land (X)* – Land not included in any other mapping category. Common examples include low density rural developments; brush, timber, wetland, and riparian areas not suitable for livestock grazing; confined livestock, poultry or aquaculture facilities; strip mines, borrow pits; and water bodies smaller than forty acres. Vacant and nonagricultural land surrounded on all sides by urban development and greater than 40 acres is mapped as Other Land.

Williamson Act of 1965

The Williamson Act was passed by the California Legislature in 1965 to preserve agricultural and open space lands in order to discourage premature and unnecessary conversion of said lands to urban uses. [6] The Williamson Act creates an arrangement whereby private landowners can contract with local cities or counties to voluntarily restrict their land to agricultural or open space uses. Williamson Act contracts are rolling 10-year contracts which allow property, in exchange for conservation, to be assessed for property tax purposes consistent with the actual property use rather than potential market value. Williamson Act contracts are governed under California Government Code Section 51243.

DISCUSSION

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

No impact. The proposed Project site is located in an unincorporated Fresno County island surrounded by the cities of Fresno and Clovis with commercial/retails land uses to

[6] California Department of Conservation. Williamson Act Program. https://www.conservation.ca.gov/dlrp/wa. Accessed August 2025.

the north, single-family residences to the west, a church to the south, and a commercial shopping center to the east across Willow Avenue. The proposed 10.55-acre Annexation Property is zoned AL 20–Limited Agricultural by Fresno County, a land use that permits residential uses such as the three existing single-family residences that occupy the proposed Annexation Property, and the two single-family residences that previously occupied the Development site.[7] Fresno County also designates the site as a County Island within the City of Fresno's Sphere of Influence (SOI).

A review of available aerial imagery and historic maps reveals that the Development site is currently vacant land that was cleared of all structures sometime between 2020 and 2022. As early as 1962, the site was used as an agricultural field. Orchards were cultivated to the south of the Development site in 1965 and within the Development site in 1982. The earliest structures within the Development site are depicted in 1974 topographic maps as two rectangular structures adjacent to Willow Avenue.[8]

However, according to the FMMP California Important Farmland Finder interactive version of the Important Farmland map data, the proposed Annexation Property is located in an area designated as Rural Residential land, and is not currently being used for agricultural purposes.[9] Additionally, the proposed Annexation Property is designated by the City General Plan as Commercial Community,[10] and is pre-zoned Commercial Community.[11] Therefore, the proposed Project would have **no impact** on land designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance.

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

No impact. The proposed Annexation Property totals approximately 10.55 acres surrounded by residential, institutional, and commercial land uses. The approximately 3.3-acre proposed Development site is currently an unimproved dirt lot. Furthermore, the Annexation Property is currently designated Commercial Community in the City General Plan, and pre-zoned Commercial Community. In addition, the Annexation Property is not located in an agricultural preserve eligible for a Williamson Act contract, which generally

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[7] County of Fresno Interactive Zoning Map. Website: https://gisportal.co.fresno.ca.us/portal/apps/webappviewer/index.html?id=b921843d343d4df998b5b3c6a301756a. Accessed April 2025.

[8] Bargas Environmental Consulting, LLC. March 2023. Cultural Resources Assessment Summary Letter Report for the Willow Nees Commercial Project in Unincorporated Fresno County, California.

[9] California Department of Conservation. 2023. California Important Farmland Finder. Website: https://maps.conservation.ca.gov/DLRP/CIFF/. Accessed April 2025.

[10] City of Fresno. 2023. Official General Plan Land Use and Circulation Map. Website: https://www.fresno.gov/wp-content/uploads/2023/08/GeneralPlanLandUseCirMap2023.pdf. Accessed April 2025.

[11] FMC 15-6103(C)(2),

requires the preserve to be at least 100 acres in size.[12] Therefore, the proposed Project would have **no impact** on existing zoning 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))?

No impact. The proposed Annexation Property, including the unimproved Development site, is currently occupied with three single-family residences and is surrounded by residential, institutional, and commercial land uses. No forest land, timberland, or timberland zoned Timberland Production exists on or in the vicinity of the proposed Annexation Property, including the proposed Development site. Furthermore, the Annexation Property is currently designated Commercial Community in the City General Plan, and pre-zoned Commercial Community. Therefore, the proposed Project would have **no impact** on land zoned for forest, timberland, or timberland production.

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

As discussed above in response to question **c)**, forest land does not exist on or proximate to the proposed Annexation Property. Therefore, the proposed Project would have **no impact** on forest land.

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?

Less than significant impact. Although the Annexation Property area is designated AL-20 Limited Agriculture by the County, it is currently occupied with single-family residences and an unimproved dirt lot, and is not used for agricultural purposes. Also, as discussed above, no forest land currently exists on or near the proposed Annexation Property site. Therefore, the proposed Project site would have a **less than significant impact** on the conversion of farmland or forest land to non-agricultural or non-forest uses.

[12] California Department of Conservation. 2023. Williamson Act Contracts. Website: https://www.conservation.ca.gov/dlrp/wa/Pages/contracts.aspx. Accessed April 2025.

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
III. AIR QUALITY – Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan (*e.g.*, by having potential emissions of regulated criterion pollutants which exceed the San Joaquin Valley Air Pollution Control Districts (SJVAPCD) adopted thresholds for these pollutants)?		X		
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 (including releasing emissions which exceed quantitative thresholds for ozone precursors)?			X	
c) Expose sensitive receptors to substantial pollutant concentrations?		X		
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?			X	

Environmental Setting

The proposed Annexation Property is currently located in Fresno County within the jurisdiction of the San Joaquin Valley Air Pollution Control District (SJVAPCD), which regulates air quality in the San Joaquin Valley Air Basin (SJVAB). This section relies on

the guidance contained in the SJVAPCD Guidance for Assessing and Mitigating Air Quality Impacts.[13]

DISCUSSION

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

Less than significant impact with mitigation incorporated. The SJVAPCD is tasked with implementing programs and regulations required by the Federal Clean Air Act and the California Clean Air Act. In that capacity, the SJVAPCD has prepared plans to attain Federal and State ambient air quality standards.

The SJVAPCD has established thresholds of significance for criteria pollutant emissions, which are based on the SJVAPCD's New Source Review (NSR) offset requirements for stationary sources. To streamline the process of assessing the significance of criteria pollutant emissions from commonly encountered projects, the SJVAPCD has developed the screening tool, Small Project Analysis Level (SPAL). Using the project type, size, and number of vehicle trips, the SJVAPCD has pre-quantified emissions and determined values below which it is reasonable to conclude that a project would not exceed applicable thresholds of significance for criteria pollutants.[14] The SJVAPCD concludes that use of the screening tool is an appropriate and effective means of promoting consistency in significance determinations within the environmental review process. A project which is determined to be below thresholds of significance can be seen to be compliant with applicable air quality plans.

The SJVAPCD has developed screening criteria to determine whether a project requires an analysis of project-generated criteria air pollutants. If all the screening criteria are met by a proposed project, then the lead agency does not need to perform a detailed air quality assessment.[15] For commercial land uses, the SJVAPCD SPAL[16] screening size for a project developing General Office Buildings is 200,000 square feet or less with associated Average Daily Trips (ADT) of 1,000 (see Appendix A–Small Project Analysis Levels Guidance Sheet). In comparison, the proposed development Project would develop 22,320 square feet of general office space with an estimated 240 ADTs. The SPAL screening size for a project developing a Medical Office Building is 68,000 square feet or less with associated ADT of 1,000. In comparison, the proposed Development would

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[13] SJVAPCD. March 2015. Guidance for Assessing and Mitigating Air Quality Impacts. Website: https://www.valleyair.org/media/g4nl3p0g/gamaqi.pdf, accessed April 2025.

[14] SJVAAPCD. 2020. Small Project Analysis Levels (SPAL). Website: https://www.valleyair.org/permitting/ceqa/, accessed April 2025.

[15] SJVAAPCD. March 2015. Guidance for Assessing and Mitigating Air Quality Impacts, Section 8.3.4.

[16] SJVAPCD. 2020. Small Project Analysis Levels (SPAL). Website: https://www.valleyair.org/permitting/ceqa/. Accessed April 2025.

develop 11,780 square feet of medical building with an estimated 424 ADTs (see Appendix F-VMT Analysis, Table 1).[17]

In addition, the SJVAPCD has implemented Regulation VIII measures (Fugitive PM10 Prohibitions) for dust control during construction. Implementation of **Regulatory Control Measure (RCM) AIR-1** (below) would ensure that the proposed Development is consistent with the SJVAPCD air quality plans.

Therefore, based on the SJVAPCD's screening criteria, the proposed Development would not exceed applicable thresholds of significance for criteria pollutants; therefore, the proposed Development would not conflict with or obstruct implementation of applicable air quality plans. Also, with the implementation of **RCM AIR–1**, the proposed Project would have a **less than significant impact with mitigation incorporated** on implementation of the SJVAPCD's applicable air quality plans.

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?

Less than significant impact. Cumulative impacts are defined as two or more individual effects which, when considered together, are either significant or "cumulatively considerable," meaning they add considerably to a significant environmental impact. A cumulative impact analysis considers a project over time and in conjunction with other past, present, and reasonably foreseeable future projects whose impacts might compound those of the project being assessed. The nonattainment status of regional pollutants is a result of past and present development. Future attainment of state and federal ambient air quality standards is a function of successful implementation of the SJVAPCD's attainment plans. Consequently, the SJVAPCD's application of thresholds of significance for criteria pollutants is relevant to the determination of whether a project's individual emissions would have a cumulatively significant impact on air quality.[18]

A project's incremental contribution to a cumulative effect is not cumulatively considerable if the project will comply with the requirements in a previously approved plan or mitigation program, including, but not limited to an air quality attainment or maintenance plan that provides specific requirements that will avoid or substantially lessen the cumulative problem within the geographic area in which the project is located.[19] As stated above, the proposed Development would not exceed applicable thresholds of significance for criteria

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[17] Peters Engineering Group. July 2023. Vehicle Miles Traveled Analysis for the Proposed Medical and Professional Office Buildings 7829 and 7835 North Willow Avenue, Fresno, California, Table 1.

[18] Guidance for Assessing and Mitigating Air Quality Impacts. Section 7.14 Result in a Cumulatively Considerable Net Increase of any Criteria Pollutant, p. 65.

[19] Ibid., p. 66.

pollutants, and would not conflict with nor obstruct implementation of applicable air quality plans. The existing single-family residences would remain unchanged; consequently, the proposed Annexation Project would not result in a cumulatively considerable net increase in any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard. Therefore, the Project would have a **less than significant impact** on applicable federal or state ambient air quality standards implemented by the SJVAPCD.

c) Expose sensitive receptors to substantial pollutant concentrations?

Less than significant impacts with mitigation incorporated. Sensitive receptors refer to those segments of the population most susceptible to poor air quality (i.e., children, the elderly, and those with pre-existing serious health problems affected by air quality). Land uses where sensitive individuals are most likely to spend time include schools and schoolyards, parks and playgrounds, daycare centers, nursing homes, hospitals, and residential communities. The closest sensitive receptors to the Development site are single-family residences located adjacent to the northern and western border of the Development site, and church south of the Development site.

According to the SJVAPCD,[20] two types of land use projects have the potential to cause long-term public health risk impacts:

1. Land use projects that will place new toxic sources in the vicinity of existing receptors, such as:

    - Gasoline dispensing facilities,
    - Asphalt batch plants,
    - Warehouse distribution centers,
    - New freeways or high traffic roads, and
    - Other stationary sources that emit toxic substances.

2. Land use projects that will place new receptors in the vicinity of existing toxics sources. This category includes residential, commercial, and institutional developments proposed to be located in the vicinity of existing toxic emission sources, such as:

    - Stationary sources,
    - Freeways or high traffic roads,
    - Rail yards, and
    - Warehouse distribution centers.

[20] Ibid. Section 6.5 Potential Land Use Conflicts and Exposure of Sensitive Receptors, p. 44.

The proposed Development would develop commercial office buildings in an area surrounded by residential, commercial, and institutional land uses. The proposed Development would not develop land uses that would include toxic sources adjacent to sensitive receptors, nor place sensitive receptors adjacent to toxic sources.

Although the proposed Development would not exceed applicable thresholds of significance for criteria pollutants, construction of the proposed Development may temporarily expose surrounding sensitive receptors to airborne particulates, as well as a small quantity of construction equipment pollutants (i.e., usually diesel-fueled vehicles and equipment). However, implementation of **RCM AIR-1**—District Regulation VIII–Fugitive PM10 Prohibitions[21] (below) would reduce potential impacts of pollutant emissions during construction to **less than significant with mitigation incorporated**.

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

Less than significant impact. The SJVAPCD has a nuisance rule addressing odor criteria in its Guide for Assessing and Mitigating Air Quality Impacts (GAMAQI), which states: "Any project with the potential to frequently expose members of the public to objectionable odors should be deemed to have a significant impact."[22] The SJVAPCD has identified some common types of facilities that have been known to produce odors in the San Joaquin Valley—a few of these are listed below:

- Painting/Coating Operations (e.g. auto body shops),
- Feed Lot/Dairy,
- Wastewater Treatment Facilities,
- Chemical Manufacturing, and
- Food Processing Facilities.

There are no facilities that are potential sources of odor sources located adjacent to or in the vicinity of the proposed Annexation Property. Additionally, the Development is for office and medical buildings, which do not constitute uses of the types listed above. Therefore, the proposed Project would not place new sensitive receptors adjacent to a known source of objectional odors.

However, during Development construction, some odors may be present from sources such as paints, adhesives, sealants and coatings, solvents, architectural coatings, and exhaust from gas- and diesel-powered equipment. However, these odors would be

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[21] Ibid. Section 8.2.3 District Regulation VIII (Fugitive PM10 Prohibition), p. 77.

[22] SJVAPCD. March 2015. Guidance for Assessing and Mitigating Air Quality Impacts. March. Website: https://www.valleyair.org/media/g4nl3p0g/gamaqi.pdf, page 102. Accessed April 2025.

temporary and limited to the construction period. Operation of the proposed Development would comply with FMC Section 15-2510, which states:

> No use, process, or activity shall produce objectionable odors that are perceptible without instruments by a reasonable person at the lot lines of a site. Odors from temporary construction, demolition, and vehicles that enter and leave the subject parcel (e.g., construction equipment, trains, vehicle emissions, trucks, etc.) are exempt from this standard.

Therefore, because the proposed Development would not place sensitive receptors adjacent to a known source of objectional odors, would follow recommendations from the SJVAPCD addressing odor criteria, and would comply with FMC Section 15-2510, the proposed development Project would result in a **less than significant impact** on other emissions (such as those leading to odors) adversely affecting a substantial number of people.

Mitigation Measures

RCM AIR-1: Consistent with SJVAPCD Regulation VIII (Fugitive PM10 Prohibitions), the following controls are required to be included as specifications for the proposed development Project and implemented at the construction site:

1. All disturbed areas, including storage piles, which are not being actively utilized for construction purposes, shall be effectively stabilized from dust emissions using water or chemical stabilizers/suppressants, or covered with a tarp or other suitable cover or vegetative ground cover.

2. All on-site unpaved roads and off-site unpaved access roads shall be effectively stabilized of dust emissions using water or chemical stabilizers/suppressants.

3. All land clearing, grubbing, scraping, excavation, land leveling, grading, cut and fill, and demolition activities shall be effectively controlled of fugitive dust emissions utilizing application of water or by presoaking.

4. When materials are transported off site, all material shall be covered, or effectively wetted to limit visible dust emissions, and at least 6 inches of freeboard space from the top of the container shall be maintained.

5. All operations shall limit or expeditiously remove the accumulation of mud or dirt from adjacent public streets at the end of each workday. (The use of dry rotary brushes is expressly prohibited except where preceded or accompanied by sufficient wetting to limit the visible dust emissions. Use of blower devices is expressly forbidden.)

6. Following the addition of materials to, or the removal of materials from, the surface of outdoor storage piles, said piles shall be effectively stabilized of fugitive dust emissions utilizing sufficient water or chemical stabilizers/suppressants.

The proposed development Project shall implement and incorporate the air quality related mitigation measures as identified in the attached Project Specific Mitigation Monitoring Checklist dated April 23, 2025.

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
IV. BIOLOGICAL RESOURCES – Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?		X		
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?				X
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				X
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?			X	

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?			X	
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?				X

Environmental Setting

The proposed approximately 10.55-acre Annexation Property, which includes the approximately 3.3-acre Development site, is located in the Central Valley region of California in the northeastern periphery of the City of Fresno. The Sierra Nevada mountain range is located approximately 35 miles east of the Development site, and the San Joaquin River is located approximately 3.7 miles northwest of the Development site.

The proposed Development site consists of an unimproved lot identified by Fresno County Assessor's Parcel Numbers (APNs) 404-481-19S and 404-481-20S. The Development site is located within Section 36 of Township 12 South, Range 20 East of the United States Geological Survey's (USGS) 7.5-minute Clovis Quadrangle. The Development site is relatively flat with elevations ranging from approximately 358 feet amsl to approximately 364 feet amsl. The Development site is bounded by scattered businesses, rural residences, and grassy fields to the north, Willow Avenue and the Depot Shopping Center to the east, CrossCity Christian Church to the south, and a residential neighborhood to the west.

This section relies on the technical analyses contained in the Biological Resources Assessment (BRA) of the development Project site (Appendix B) prepared by Bargas in September 2022.[23] As part of the assessment, Bargas conducted a field survey of the Development site on August 8, 2022. At the time of the survey, the approximately 3.3-

[23] Bargas Environmental Consulting, LLC. September 2022. Biological Resources Letter Report for the Willow and Nees Commercial Project in City of Fresno, California.

acre site was a highly disturbed, unimproved dirt lot with a small amount of non-native vegetation. Additionally, no aquatic resources were mapped near the Development site nor observed within the Development site during the field survey.

DISCUSSION

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 the U.S. Fish and Wildlife Service?

Less than significant impact with mitigation incorporated. As noted above, Bargas prepared a BRA for the Development site. Key elements of the BRA are presented below.

Desktop Review

Before conducting a habitat assessment of the Development site, Bargas biologists performed an initial review of literature and data sources to characterize the biological conditions on the Development site and to compile records of sensitive biological resources in the Development vicinity, including occurrences of special-status species. The likelihood of occurrences of candidate, sensitive, or special status species at the Development site is discussed below.

Field Survey

Bargas biologist Rachel Clark conducted a field survey of the Development site and surrounding 500-foot buffer area (also referred to as the Biological Survey Area or BSA). The survey was conducted by walking meandering transects throughout the development Project site and using 8x42 binoculars to ensure full visual coverage of the BSA. The field survey was conducted following applicable survey protocols or guidelines. The field survey found the Development site to be highly disturbed and comprised primarily of a dirt lot (previously occupied by two single-family residences) with a small amount of non-native vegetation. In addition, the Development site and immediate surrounding areas had no native or natural vegetation communities.

The Development site was surveyed for the following habitat features based on the results of the desktop review: vernal pools, wetlands, riparian habitats, saltbush scrub, annual and alkali grasslands, oak savanna, evergreen forest, chaparral, mudflats, milkweed (*Asclepias*) plants, large trees and shrubs, and small mammal burrows.

Plants and Wildlife

Most plants and wildlife species observed at the Development site during the survey were

typical of those found within urbanized residential areas and associated habitats. Nine bird species were detected during the survey: Canada goose (*Branta canadensis*), mourning dove (*Zenaida macroura*), black phoebe (*Sayornis nigricans*), California scrub-jay (*Aphelocoma californica*), American crow (*Corvus brachyrhynchos*), northern mockingbird (*Mimus polyglottos*), lesser goldfinch (*Spinus psaltria*), house finch (*Haemorhous mexicanus*), and house sparrow (*Passer domesticus*). Additionally, the surveyor thoroughly covered the BSA to determine if suitable habitat was present for any of the special status species identified during the desktop review. The following summarizes the biologist's conclusions regarding the likelihood of occurrences of candidate, sensitive, or special status species at or in the vicinity of the Project site:

Sanford's Arrowhead, California Rare Plant Rank 1B.2. This species is associated with freshwater wetlands and wetland-riparian habitats. No evidence of Sanford's arrowhead or associated wetland habitat was observed in the BSA. Therefore, there is no potential for Sanford's arrowhead to occur on the Project site.

Greene's Tuctoria, California Rare Plant Rank 1B.1, State Listed Rare (SR), Federally Endangered (FE). This species is associated with freshwater wetlands, valley grassland, and vernal pool habitats. The BSA does not contain any freshwater wetland, valley grassland, or vernal pool habitat. Slight depressions were observed on the Development site where structures have been removed; however, no water was observed in any of the depressions during the site survey, and no evidence of water features was observed in historic aerial photographs. Therefore, there is no potential for Greene's tuctoria to occur on the Project site.

Vernal Pool Fairy Shrimp, Federally Threatened (FT). This species is associated with vernal pool habitats. No evidence of vernal pool fairy shrimp or associated vernal pool habitat was observed in the BSA. Slight depressions were observed on the Development site where structures have been removed; however, no water was observed in any of the depressions during the site survey, and no evidence of water features was observed in historic aerial photographs. Therefore, there is no potential for vernal pool fairy shrimp to occur on the Project site.

Conservancy Fairy Shrimp, FE. This species is associated with vernal pool habitats. No evidence of conservancy fairy shrimp or associated vernal pool habitat was observed in the BSA. Slight depressions were observed on the Development site where structures have been removed; however, no water was observed in any of the depressions during the site survey, and no evidence of water features was observed in historic aerial photographs. Therefore, there is no potential for conservancy fairy shrimp to occur on the Project site.

Monarch Butterfly, Federal Candidate (FC, California overwintering population). This species is associated with milkweed host plants for breeding and food source, and

large trees such as blue gum (*Eucalyptus globulus*), red gum (*E. camadulensis*), Monterey pine (*Pinus radiata*), Monterey cypress (*Cupressus macrocarpa*), western sycamore (*Platanus racemosa*), coast redwood (*Sequoia sempervirens*), and coast live oak (*Quercus agrifolia*) for roosting. The majority of the overwintering sites in California occur along the coast (within 1.5 miles from the Pacific Ocean or San Francisco) (Western Monarch Milkweed Mapper 2018). The Project site is 114 miles east of the Pacific Ocean and no evidence of monarch butterfly or any species of its larval host plant (*Asclepias*) was observed in the BSA. Therefore, there is no potential for monarch butterfly to occur on the Project site.

California Tiger Salamander (central California DPS), FT, State Threatened (ST). This species is associated with vernal pools and other shallow ephemeral aquatic features for breeding, and with small mammal burrows for upland refugia. No evidence of California tiger salamander or suitable aquatic or upland habitat was observed on the Development site. There is a water retention basin located approximately 0.24 mile southwest of the Project site; however, the retention basin does not provide potentially suitable breeding habitat for this species. There are no potentially suitable breeding sites within a mile of the Project site. Therefore, there is no potential for California tiger salamander to occur on the Project site.

Giant Gartersnake, FT, ST. This species is associated with various aquatic features such as canals, sloughs, ponds, small lakes, low gradient streams, and adjacent wetlands. No evidence of giant gartersnake or suitable aquatic habitat features for this species was observed in the BSA. Therefore, there is no potential for giant gartersnake to occur on the Project site.

Blunt-nosed Leopard Lizard, FE, State Endangered (SE), State Fully Protected (SFP). This species is associated with open, sparsely vegetated areas, saltbush scrub, alkali playa, and rodent burrows for shelter. No evidence of blunt-nosed leopard lizards, or alkali playa or saltbush scrub habitat used by this species was observed in the BSA. Additionally, no suitable small mammal burrows were observed in the Development area. Therefore, there is no potential for blunt-nosed leopard lizard to occur on the Project site.

Western Grebe. This species is associated with freshwater lakes and marshes. A water retention basin located approximately 0.24 miles southwest of the Project site has the potential to host migrating western grebes, but no evidence of this species or suitable aquatic habitat was observed on the Development site. Therefore, there is no potential for western grebe to occur on the Project site.

Clark's Grebe. This species is associated with freshwater lakes and marshes, and tidal waters. A water retention basin located approximately 0.24 miles southwest of the Project site has the potential to host migrating Clark's grebes, but no evidence of Clark's grebe or suitable aquatic habitat was observed on the Development site. Therefore, there is no

potential for Clark's grebe to occur on the Project site.

Golden Eagle, California Department of Fish and Wildlife Fully Protected (CDFW FP), United States Fish and Wildlife Service Birds of Conservation Concern (USFWS BCC). This species is associated with rolling foothills, mountain areas, sage-juniper flats, and desert. No evidence of golden eagle or suitable habitat for this species was observed on the Development Project site or the surrounding areas. Therefore, there is no potential for golden eagle to occur on the Project site.

Bald Eagle, SE, SFP, USFWS BCC. This species is associated with large water bodies for foraging and large trees adjacent to water bodies for nesting and perching. No bald eagles or suitable habitat for this species was observed in the BSA. Therefore, there is no potential for bald eagle to occur on the Project site.

Short-billed Dowitcher. This species is associated with intertidal mudflats and estuarine habitats, shallow ponds and lakes, and irrigated fields. A water retention basin located approximately 0.24 mile southwest of the Project site has the potential to host migrating short-billed dowitchers, but no evidence of this species was detected and no suitable habitat was observed on the Development site. Therefore, there is no potential for short-billed dowitcher to occur on the Project site.

Black Tern, CDFW Species of Special Concern (SSC). This species is associated with freshwater emergent wetlands, bays, salt ponds, river mouths, and pelagic waters. A water retention basin located approximately 0.24 mile southwest of the Project site has the potential to host migrating or nesting black terns, but no evidence of this species or suitable habitat for this species was observed on the Development site. Therefore, there is no potential for black tern to occur on the Project site.

Western Yellow-billed Cuckoo, ST, FE. This species is associated with extensive riparian woodlands, often consisting of willow, cottonwood, and sycamore. This species requires dense canopy cover with high native tree density, and breeding territories are large, typically 20 hectares in size. No evidence of western yellow-billed cuckoo or suitable habitat for this species was observed in the BSA. The nearest potentially suitable habitat for this species is along the San Joaquin River, approximately 3.7 miles to the northwest of the Project site. Therefore, there is no potential for western yellow-billed cuckoo to occur on the Project site.

Nuttall's Woodpecker. This species is associated with oak woodlands from 900 feet to 5,500 feet in elevation. No evidence of Nuttall's woodpecker or suitable oak woodland habitat was observed in the BSA. Although two different oak trees were observed on the Development site during the survey, the habitat is not sufficient to support populations of this species. Therefore, there is no potential for Nuttall's woodpecker to occur on the Project site.

Olive-sided Flycatcher, CDFW SSC, USFWS BCC. This species is associated with openings or edges of coniferous forests from sea level to 10,000 feet in elevation. No evidence of olive-sided flycatcher or suitable evergreen forest habitat was observed in the BSA. Therefore, there is no potential for olive-sided flycatcher to occur on the Project site.

Oak Titmouse. This species is associated with dry, open oak or oak-pine woodlands. No evidence of oak titmouse or suitable oak or oak-pine woodland was observed in the BSA. Therefore, there is no potential for oak titmouse to occur on the Project site.

Wrentit. This species is associated with coastal scrub and chaparral habitats. No evidence of wrentit or suitable coastal scrub or chaparral habitat was observed in the BSA. Therefore, there is no potential for wrentit to occur on the Project site.

California Thrasher. This species is associated with chaparral habitat. No evidence of California thrasher or suitable chaparral habitat was observed in the BSA. Therefore, there is no potential for California thrasher to occur on the Project site.

Common Yellowthroat. This species is associated with wet meadows, freshwater emergent wetlands, saline emergent wetlands, valley foothill riparian habitats, desert riparian, annual grasslands, and perennial grasslands. A water retention basin located approximately 0.24 mile to the southwest of the Project site has the potential to host migrating or breeding common yellowthroats, but no evidence of this species or suitable habitat for this species was observed on the Development site. Therefore, there is no potential for common yellowthroat to occur on the Project site.

Belding's Savannah Sparrow, SE, USFWS BCC. This species is associated with coastal saltmarsh habitat and has occurred historically from Goleta to the Tijuana River Estuary. No evidence of Belding's savannah sparrow or suitable coastal saltmarsh habitat was observed in the BSA. In addition to the lack of suitable habitat for this species, the Project area is approximately 170 miles away from the northernmost part of its range. Therefore, there is no potential for Belding's savannah sparrow to occur on the Project site.

Tricolored Blackbird, ST, CDFW SSC, USFWS BCC. This species is associated with wetlands containing dense vegetation and agricultural fields for breeding, and with cultivated fields, wetlands, and feedlots for foraging. There is potentially suitable habitat for this species approximately 0.24 mile to the southwest at a water retention basin, but no evidence of tricolored blackbird or suitable breeding or foraging habitat was observed in the BSA. Therefore, there is no potential for tricolored blackbird to occur on the Project site.

Bullock's Oriole. This species is associated with riparian and open woodlands, and even

urban and residential areas with suitable habitat. No evidence of Bullock's oriole or suitable woodland habitat was observed on the Development site, but suitable nest trees were observed in the BSA to the north and south. Therefore, there is medium potential for Bullock's oriole to occur on the Project site.

Lawrence's Goldfinch, USFWS BCC. This species is associated with dry, open oak woods with chaparral, weedy fields, and freshwater sources. No evidence of Lawrence's goldfinch or suitable oak woodlands was observed in the BSA. While it is not likely for this species to nest in the BSA, the Development site contains sections of open, weedy habitat that have the potential to attract foraging flocks of this species. Therefore, there is medium potential for Lawrence's goldfinch to occur on the Project site.

San Joaquin Kit Fox, FE, ST. This species is associated with open grassland and scrub communities with loose soils for denning. No evidence (i.e., dens) of San Joaquin kit fox was observed in the survey area. There are no known populations of this species in or near the BSA. According to the USFWS Species Status Assessment Report for San Joaquin kit fox, the closest population of San Joaquin kit fox is approximately 80 miles south of the Project site, near Delano (USFWS 2020). Therefore, there is no potential for San Joaquin kit fox to occur on the Project site.

Fresno Kangaroo Rat, FE, SE. This species is associated with alkali sink open grassland. No evidence of Fresno kangaroo rat or suitable habitat for this species was observed in the BSA. Therefore, there is no potential for Fresno kangaroo rat to occur on the Project site.

Delta Smelt, FT, SE. This species is associated with estuarine habitats in the Suisun Bay upstream through the delta in Contra Costa, Sacramento, San Joaquin, Solano, and Yolo Counties. No evidence of delta smelt or suitable aquatic habitat for this species was observed in the BSA. Therefore, there is no potential for delta smelt to occur on the Project site.

In conclusion, no State or Federally listed sensitive species or natural vegetation were observed on the Development site during the habitat assessment. However, bird species protected by the Migratory Bird Treaty Act (MBTA) can occur almost anywhere, including disturbed and heavily landscaped areas. Open, less vegetated areas in the survey area can encourage ground-nesting by species such as mourning dove, which was observed on the Development site. Small trees of various species scattered throughout the Development site have the potential to attract nesting birds, especially as the trees grow larger. An oak tree and an unknown stone fruit tree located along a fence at the southeast corner of the Development site have the potential to attract nesting birds. Areas adjacent to the Development site that also have the potential to attract nesting birds, including raptors, are the evergreen trees on the CrossCity Christian Church property to the south, and large trees scattered among private properties to the north. Also, although not

observed during the site survey, there is medium potential for the Bullock's oriole and Lawrence's goldfinch to occur at the Development site. In order to mitigate potential impacts to special-status species and birds protected by the MBTA, **Mitigation Measures BIO–1** and **BIO-2** are included to ensure that potential impacts to migratory birds and the above-stated species remain less than significant. Therefore, the proposed Project would have a **less than significant impact with mitigation incorporated** on candidate, sensitive, or special status species.

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 the U.S. Fish and Wildlife Service?**

No impact. A review of USGS topographic maps, the USFWS National Wetlands Inventory (NWI), Google Earth Pro aerial imagery, and historic aerial photographs revealed no evidence of potentially jurisdictional water features or wetlands on or immediately adjacent to the Project site.

Also, no drainage features (i.e., riparian/riverine or ditches or water features) were observed on-site during the survey. Furthermore, no sensitive natural communities identified in local or regional plans, policies, or regulations by the CDFW or the USFWS were mapped or observed on or adjacent to the Project site. Therefore, due to a lack of riparian/riverine habitat and sensitive natural communities within or near the Project BSA, **no impact** would occur as a result of the proposed Project to riparian habitat or other sensitive natural communities.

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

No impact. As stated above, a review of USGS topographic maps, the USFWS NWI, Google Earth Pro aerial imagery, and historic aerial photographs revealed no evidence of potentially jurisdictional water features on or immediately adjacent to the Project site. In addition, no wetlands, marsh, vernal pools, or coastal habitat were mapped or observed on or adjacent to the Project site. Therefore, due to a lack of wetlands, marsh, vernal pools, or coastal habitat features within or near the Project BSA, **no impact** would occur as a result of the proposed Project to wetlands, marsh, vernal pools, or coastal habitat.

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

Less than significant impact. As identified in the BRA, no aquatic resource features,

native wildlife nursery sites, or migratory wildlife corridors were identified within the Project BSA during the desktop review or Development site survey. Therefore, the proposed Project would not affect native resident or migratory fish or native wildlife nursery sites, and would have a **less than significant impact** on the movement of wildlife species that may visit the site.

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

Less than significant impact. The City's development review process, including conditions of approval, would ensure that the proposed development Project complies with FMC Chapter 13, Article 3 Street Trees and Parkways. Article 3 provides guidelines and requirements for the preservation and protection of existing street trees, as well as guidelines establishing the installation of City-owned trees along streets. The proposed Project would comply with the requirements established in FMC Chapter 13, Article 3. Therefore, the proposed Project would not conflict with local ordinances protecting biological resources such as a tree preservation ordinance, and potential impacts to the City's public tree ordinance would be **less than significant**.

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

No impact. The proposed Project site is located within the Fresno General Plan Planning Area. The Planning Area is not located within the boundaries of any approved or draft Habitat Conservation Plan (HCP), Natural Community Conservation Plan (NCCP), or other adopted local, regional or state HCP. Therefore, the proposed Project would have **no impact** on an adopted HCP or NCCP.

Mitigation Measures

MM BIO–1: Construction of the proposed project shall avoid, where possible, vegetation communities that provide suitable habitat for a special-status species known to occur within the Planning Area. If construction within potentially suitable habitat must occur, the presence/absence of any special-status plant or wildlife species must be determined prior to construction, to determine if the habitat supports any special-status species. If a special-status species is determined to occupy any portion of a project site, avoidance and minimization measures shall be incorporated into the construction phase of a project to avoid direct or incidental take of a listed species to the greatest extent feasible.

MM BIO–2: The project should avoid, if possible, construction within the general nesting season of February through August for avian species protected under Fish and Game Code 3500 and the Migratory Bird Treaty Act (MBTA), if it is determined that suitable

nesting habitat occurs on a project site. If construction cannot avoid the nesting season, a pre-construction clearance survey shall be conducted by a qualified biologist to determine if any nesting birds or nesting activity is observed on or within 500-feet of a project site. If an active nest is observed during the survey, a biological monitor shall be on site to ensure that no proposed project activities would impact the active nest. A suitable buffer shall be established around the active nest until the nestlings have fledged and the nest is no longer active. Project activities may continue in the vicinity of the nest only at the discretion of the biological monitor. Prior to commencement of grading activities and issuance of any building permits, the Director of the City of Fresno Planning and Development Department, or designee, shall verify that all proposed project grading and construction plans include specific documentation regarding the requirements of the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code Section 3503, that preconstruction surveys have been completed and the results reviewed by staff, and that the appropriate buffers (if needed) are noted on the plans and established in the field.

The proposed Development shall implement and incorporate the biological resource related mitigation measures as identified in the attached Project Specific Mitigation Monitoring Checklist dated April 23, 2025.

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
V. CULTURAL RESOURCES – Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?		X		
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?		X		
c) Disturb any human remains, including those interred outside of formal cemeteries?		X		

Environmental Setting

Cultural resources include prehistoric-era archaeological sites, historic-era (i.e., 50 years old or older) archaeological sites, Native American traditional cultural properties, sites of religious and cultural significance, and historical buildings, structures, objects, and sites.

The Project site is located in the Central Valley region of California in the northeastern periphery of the City of Fresno. The Sierra Nevada mountain range is located approximately 35 miles east of the Project site, and the San Joaquin River is located approximately 3.7 miles northwest of the Project site. The 3.3-acre Development site is located at 7819 and 7835 North Willow Avenue in an unincorporated area of Fresno County near the cities of Fresno and Clovis. The Development site is further identified by Fresno County APNs 404-481-19S and 404-481-20S. The Development site is located within a 10.55-acre unincorporated Fresno County island that is proposed for annexation (Annexation Property) surrounded by the cities of Fresno and Clovis. The proposed Development site is bounded by rural residences to the north (existing residences within the Annexation Property), single-family residences to the west, a church to the south, and commercial buildings to the east. The Project site lies within Section 36 of Township 12 South, Range 20 East, as shown on the Clovis, California USGS topographic quadrangle.

This section relies on the technical analyses contained in the Cultural Resource Assessment of the development Project site (Appendix C) prepared by Bargas in March

2023.[24] This report was prepared in compliance with CEQA and the California PRC. According to §15064.5 of the CEQA Guidelines, the potential impacts of a proposed project on significant cultural resources must be considered during the planning process. A project that may cause a substantial adverse effect on the significance of a historical resource is a project that may have a significant effect on the environment. If a project would result in significant adverse effects on historical resources, then alternative plans or mitigation measures must be considered; however, only significant historical resources need to be addressed.

DISCUSSION

a) Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?

Less than significant with mitigation incorporated. According to CEQA Guidelines §15064.5, significant resources defined as "historical resources" are those that are: 1) determined eligible for, or are listed in, the California Register of Historical Resources (CRHR), 2) "included in a local register of historical resources," or 3) "any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California …, provided the lead agency's determination is supported by substantial evidence in light of the whole record." California PRC Section 5024.1 requires evaluation of historical resources to determine their eligibility for listing in the CRHR. The purpose of the register is to maintain listings of California's historical resources and to indicate which resources are to be protected from substantial adverse change. The criteria for listing resources in the CRHR were expressly developed to be in accordance with previously established federal criteria for listing in the National Register of Historic Places (NRHP).

Methods

The CEQA process for identifying potential impacts to cultural resources includes: (a) the identification of cultural resources within a proposed project area; (b) an evaluation of whether the identified resources qualify as historical resources; (c) an assessment to determine whether a project may have a significant impact on historical resources, including tribal cultural resources as defined at PRC Section 21074; and finally (d) the development of avoidance/preservation measures or mitigation measures that would preferably avoid impacts or reduce potential impacts to a level that is less than significant.

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[24] Bargas Environmental Consulting, LLC. March 2023. Cultural Resources Assessment Summary Letter Report for the Willow Nees Commercial Project in Unincorporated Fresno County, California.

As part of the cultural resources assessment prepared for the proposed development Project, a records search was conducted at the Southern San Joaquin Valley Information Center (SSJVIC) at California State University, Bakersfield, which included a review of properties listed on the NRHP and CRHR, a review of historic maps and aerial photographs/imagery, and a search of the NAHC's SLF.

Existing Conditions

The API for the proposed Development is defined as the entirety of the Development footprint, which includes all proposed work activities and access roads (see Appendix C, Attachment A, Figure 2). The applicant previously demolished two existing single-family residences and their associated structures, including all landscaping elements, trees, vegetation, and residential utilities such as potential wells or septic systems within the API. Consequently, the API consists of a vacant lot, populated by grasses and weeds. Given the previous disturbances within the API from the original construction of the two single-family residences and their associated structures and landscaping, and the subsequent demolition of those structures and landscaping elements, there is no native ground surface remaining within the API.

Records Search Results

A records search was conducted by staff at the SSJVIC on September 12, 2022. This search included the API and a 0.5-mile radius (see Appendix C, Attachment A, Figure 3) and reviewed previously conducted studies and previously identified cultural resources located within the API and the surrounding area.

Previous Historical Cultural Resources Studies

Six previous investigations have been conducted within 0.5 mile of the Project API (see Table 1 of Appendix C). Two of these investigations overlapped the API, one of which is an Historic Property Survey Report (FR-02318) (Morlet 2009) and one is an Archaeological Survey Report (FR-02319) (Baloian 2009). Both studies were conducted in 2009 and **did not result in the identification of existing historical cultural resources within the Project API** (see Appendix C, Table 1). While Morlet (2009) did not identify any cultural resources within the current API, Baloian (2009) identified the possibly historic-era (i.e., 50 years old or older) Maupin Ditch while conducting archival research (Baloian 2009). As observed on USGS topographic maps, this ditch runs parallel to Willow Avenue and crosses the current API. However, Baloian did not observe the ditch during pedestrian survey, and he also notes that it has likely been "piped underground" (Baloian 2009).

Known Historical Cultural Resources

One known cultural resource (P-10-003930/CA-FRE-003109H) was identified within 0.5-mile of the API. The resource is located approximately 0.35 miles north/northeast of and outside the API. This resource was originally documented in 1998 (Norton 1998).

Cultural resource P-10-003930 (CA-FRE-003109H) is a portion of the historic-era Southern Pacific Railroad alignment, which extends through the cities of Fresno and Clovis. The portion of the Southern Pacific Railroad closest to the API was constructed between 1872 and 1873. The ballast, ties, spikes, and rails does not appear to be extant and the railroad grade alignment is now used as a jogging and bike trail (Fresno-Clovis Rail-Trail) (Baloian 2013, 2015; Freeman and Flores 2009; Hibma 2010; Hooper and Flint 1999; Jones 2018a,b; Larson and Toffelmier 2004; McCausland 2018; Murphy 2002; Norton 1998; Tibbet 2016).

No previously recorded historical cultural resources were identified within the API. No prehistoric resources have been recorded within 0.5 mile of the API. No NRHP- or CRHR-listed or eligible resources or locally significant buildings or structures were identified within 0.5 mile of the API as a result of the review of the NRHP and CRHR.[25]

Historic Map and Aerial Imagery Review Results

A review of available aerial imagery and historic maps reveals that the Development API is currently vacant land that was cleared of all structures sometime between 2020 and 2022. As early as 1962, the API was utilized as an agricultural field. Orchards were cultivated to the south of the API in 1965 and within the API in 1982. The orchards were likely removed sometime between 1982 and 1998. Historic aerial maps indicate that the surrounding street alignments were in place between 1923 and 1947—East Nees Avenue to the north, East Alluvial Avenue to the south, North Willow Avenue to the east, and North Chestnut Avenue to the west.

The earliest structures within the API are depicted in 1974 topographic maps as two rectangular structures adjacent to Willow Avenue. A shed is visible as well in the southwest portion of the API in 1972 aerial imagery. A ditch ("Maupin Ditch"), located adjacent to North Willow Avenue and within the API, is visible in 1962 aerial imagery and is depicted in 1965 historic topographic maps. The ditch is also depicted in the 1972 and 1984 topographic maps but is not visible on topographic maps beyond 1998. Modern aerial imagery indicates that the ditch was likely demolished when North Willow Avenue was widened, and a sidewalk was installed on the western shoulder of the road, sometime between 1998 and 2002.

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[25] City of Clovis. 2014. Draft Program Environmental Impact Report Volume I: Draft PEIR and Appendix A, General Plan and Development Code Update. Electronic document, https://cityofclovis.com/wp-content/uploads/2018/10/Cover-and-Table-of-Contents.pdf, accessed September 2022.

Sacred Lands File Search Results

The NAHC maintains the confidential SLF, which contains information on sites of traditional, cultural, or religious value to the Native American community. A search of the SLF was requested from the NAHC on August 31, 2021, (Appendix C, Attachment B). Bargas received a response from the NAHC on October 28, 2022, stating the SLF search was negative. However, the NAHC noted that while the results are negative this does not guarantee the absence of cultural resources within the development Project API. The NAHC identified Native American Tribes and representatives that may have knowledge of cultural resources within the area. Correspondence between Bargas and the NAHC is provided in Attachment B of Appendix C.

Summary

No previously recorded historical cultural resources were identified within or overlapping the API as a result of the SSJVIC records, and a search of the NAHC's SLF returned negative results. However, an agricultural ditch ("Maupin Ditch"), likely no longer extant, once overlapped the API. Although the structures and associated features once located within the API have been demolished, there may be associated subsurface historic-age features or deposits that remain. Given this potential for historical cultural resources within the API, implementation of **Mitigation Measure CUL 1** is included, which requires that a qualified archaeologist conduct cultural resources sensitivity training to the construction crew prior to the onset of Development-related ground-disturbing activities. While on-site for the cultural resources sensitivity training, the archaeologist shall also investigate whether any trace of the historic-age Maupin Ditch remain within the API and if so, formally document this resource on the applicable Department of Parks and Recreation (DPR) 523 series forms and assess its significance and eligibility for listing in the CRHR. The Development would comply with **Mitigation Measures CUL-2** and **CUL-3** in order to avoid inadvertent impacts to unknown resources. Implementation of **Mitigation Measures CUL 1, CUL-2** and **CUL-3** would reduce potential impacts of the Project to historical cultural resources to **less than significant with mitigation incorporated.**

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?

Less than significant impact with mitigation incorporated. As stated above, a records search was conducted by staff at the SSJVIC on September 12, 2022, that included the API and a 0.5-mile radius and reviewed previously conducted studies and previously identified cultural resources located within the API and the surrounding area; a review of available aerial imagery and historic maps was conducted; and a search of the SLF was requested from the NAHC on August 31, 2021.

No previously recorded archaeological resources were identified within or overlapping the

API as a result of the SSJVIC records, and a search of the NAHC's SLF returned negative results. However, an agricultural ditch ("Maupin Ditch"), likely no longer extant, once overlapped the API. Although the structures and associated features once located within the API have been demolished, there may be associated subsurface historic-age features or deposits that remain. Given this potential for cultural resources within the API, implementation of **Mitigation Measure CUL 1** is included, which requires that a qualified archaeologist conduct cultural resources sensitivity training to the construction crew prior to the onset of Development-related ground-disturbing activities. While on-site for the cultural resources sensitivity training, the archaeologist shall also investigate whether any trace of the historic-age Maupin Ditch remain within the API and if so, formally document this resource on the applicable DPR 523 series forms, and assess its significance and eligibility for listing in the CRHR. The Development would implement **Mitigation Measures CUL-2** and **CUL-3** in order to avoid inadvertent impacts to unknown resources. Implementation of **Mitigation Measures CUL-1, CUL-2** and **CUL-3** would reduce potential impacts of the Project to archaeological resources to **less than significant with mitigation incorporated.**

c) Disturb any human remains, including those interred outside of formal cemeteries?

Less than significant with mitigation incorporated. The discovery of human remains is always a potential during ground-disturbing activities. If human remains are discovered, a protocol defined by California state law (California Health & Safety Code 7050.5 and PRC 5097.98) is required to determine if the uncovered remains are modern or archaeological. If human remains are discovered, implementation of **Mitigation Measure CUL-4** requires that all work must immediately stop, and the county coroner must be contacted. Additionally, the City of Fresno must be contacted and notified of the discovery of human remains. If it is determined by the coroner that the human remains are of Native American origin, the coroner shall notify the NAHC, who shall then identify the most likely descendant (MLD). The MLD will be consulted to determine the best course of action for treatment and/or repatriation of the human remains, be granted access to examine the remains, and have 48 hours to provide recommendations. If the MLD does not make a recommendation within 48 hours of being given access to the human remains, the land manager can rebury the human remains in a location that will not be subject to future ground disturbing activities.

Therefore, **Mitigation Measure CUL-4** would lessen the potential Project impact to unidentified, buried human remains to **less than significant with mitigation incorporated.**

Mitigation Measures

MM CUL 1: A qualified archaeologist shall conduct cultural resources sensitivity training to the construction crew prior to the onset of development Project-related ground-disturbing activities. While on-site for the cultural resources sensitivity training, the archaeologist shall also investigate whether any trace of the historic-age Maupin Ditch remain within the API and if so, formally document this resource on the applicable Department of Parks and Recreation (DPR) 523 series forms and assess its significance and eligibility for listing in the CRHR.

MM CUL-2: If previously unknown resources are encountered before or during grading activities, construction shall stop in the immediate vicinity of the find and a qualified historical resources specialist shall be consulted to determine whether the resource requires further study. The qualified historical resources specialist shall make recommendations to the City on the measures that shall be implemented to protect the discovered resources, including but not limited to excavation of the finds and evaluation of the finds in accordance with Section 15064.5 of the CEQA Guidelines and the City's Historic Preservation Ordinance.

If the resources are determined to be unique historical resources as defined under Section 15064.5 of the CEQA Guidelines, measures shall be identified by the monitor and recommended to the Lead Agency. Appropriate measures for significant resources could include avoidance or capping, incorporation of the site in green space, parks, or open space, or data recovery excavations of the finds.

No further grading shall occur in the area of the discovery until the Lead Agency approves the measures to protect these resources. Any historical artifacts recovered as a result of mitigation shall be provided to a City-approved institution or person who is capable of providing long-term preservation to allow future scientific study.

MM CUL-3: Subsequent to a preliminary City review of the project grading plans, if there is evidence that a project will include excavation or construction activities within previously undisturbed soils, a field survey and literature search for prehistoric archaeological resources shall be conducted. The following procedures shall be followed.

If prehistoric resources are not found during either the field survey or literature search, excavation and/or construction activities can commence. In the event that buried prehistoric archaeological resources are discovered during excavation and/or construction activities, construction shall stop in the immediate vicinity of the find and a qualified archaeologist shall be consulted to determine whether the resource requires further study. The qualified archaeologist shall make recommendations to the City on the measures that shall be implemented to protect the discovered resources, including but not limited to excavation of the finds and evaluation of the finds in accordance with Section

15064.5 of the CEQA Guidelines. If the resources are determined to be unique prehistoric archaeological resources as defined under Section 15064.5 of the CEQA Guidelines, mitigation measures shall be identified by the monitor and recommended to the Lead Agency. Appropriate measures for significant resources could include avoidance or capping, incorporation of the site in green space, parks, or open space, or data recovery excavations of the finds. No further grading shall occur in the area of the discovery until the Lead Agency approves the measures to protect these resources. Any prehistoric archaeological artifacts recovered as a result of mitigation shall be provided to a City-approved institution or person who is capable of providing long-term preservation to allow future scientific study.

If prehistoric resources are found during the field survey or literature review, the resources shall be inventoried using appropriate State record forms and submit the forms to the Southern San Joaquin Valley Information Center. The resources shall be evaluated for significance. If the resources are found to be significant, measures shall be identified by the qualified archaeologist. Similar to above, appropriate mitigation measures for significant resources could include avoidance or capping, incorporation of the site in green space, parks, or open space, or data recovery excavations of the finds. In addition, appropriate mitigation for excavation and construction activities in the vicinity of the resources found during the field survey or literature review shall include an archaeological monitor. The monitoring period shall be determined by the qualified archaeologist. If additional prehistoric archaeological resources are found during excavation and/or construction activities, the procedure identified above for the discovery of unknown resources shall be followed.

MM CUL-4: In the event that human remains are unearthed during excavation and grading activities of any future development project, all activity shall cease immediately. Pursuant to Health and Safety Code (HSC) Section 7050.5, no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98(a). If the remains are determined to be of Native American descent, the coroner shall within 24 hours notify the Native American Heritage Commission (NAHC). The NAHC shall then contact the most likely descendent of the deceased Native American, who shall then serve as the consultant on how to proceed with the remains. Pursuant to PRC Section 5097.98(b), upon the discovery of Native American remains, the landowner shall ensure that the immediate vicinity, according to generally accepted cultural or archaeological standards or practices, where the Native American human remains are located is not damaged or disturbed by further development activity until the landowner has discussed and conferred with the most likely descendants regarding their recommendations, if applicable, taking into account the possibility of multiple human remains. The landowner shall discuss and confer with the descendants all reasonable options regarding the descendants' preferences for treatment.

The proposed Project shall implement and incorporate the cultural resources related mitigation measures as identified in the attached Project Specific Mitigation Monitoring Checklist dated April 23, 2025.

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

Environmental Setting

The California Building Standards Code (Cal. Code Regs., Title 24) was created in 1978 when state legislation (SB 331, Robbins) mandated that building standards be unified in a single code within the California Code of Regulations (CCR) and designated as Title 24.[26]

Part 6 of Title 24 presents the Building Energy Efficiency Standards (Energy Code). The Energy Code contains energy and water efficiency requirements and indoor air quality requirements for newly constructed buildings, additions to existing buildings, and alterations to existing buildings.[27]

Part 11 of Title 24 is formally known as the California Green Building Standards Code, or CALGreen. The purpose of the *CALGreen* code is to improve public health, safety and general welfare by enhancing the design and construction of buildings through mandating

[26] Department of General Services. History of the California Building Code. Website: https://www.dgs.ca.gov/BSC/About/History-of-the-California-Building-Code--Title-24-Part-2. Accessed April 2025.

[27] California Energy Commission. 2022. The 2022 Building Energy Efficiency Standards for Residential and Nonresidential Buildings, Title 24, Part 6. Website: https://www.energy.ca.gov/publications/2022/2022-nonresidential-and-multifamily-compliance-manual-2022-building-energy. Accessed April 2025.

the use of building concepts having a reduced negative impact or positive environmental impact and encouraging sustainable construction practices in the following categories:[28]

- Planning and design,
- Energy efficiency,
- Water efficiency and conservation,
- Material conservation and resource efficiency, and
- Environmental quality.

DISCUSSION

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

Less than significant impact. In December 2022, the City adopted the most recent versions of the California Building Energy Efficiency Standards (California Energy Code) under FMC Chapter 11, Article 1, Section 11-108, and the California Green Building Standards Code (CALGreen) under FMC Chapter 11, Article 1, Section 11-109 (called Fresno CALGreen).

The proposed Development, which consists of the construction and operation of two office buildings and one medical building totaling 34,100 square feet with appurtenant parking and landscaping, would include energy efficient design features and green building standards mandated by CALGreen. A few such standards are listed below:

- Stormwater Pollution Prevention—the Development will prepare and implement a Stormwater Pollution Prevention Plan (SWPPP), because the Development will disturb more than one acre of land, including Best Management Practices (BMPs) to prevent soil erosion and non-stormwater discharges (CALGreen Code Section 5.106).

- Grading and Paving—provide construction plans that indicate how site grading or a drainage system will manage all surface water flows to keep water from entering buildings.

- Construction Waste Reduction, Disposal, and Recycling—the Development will recycle and/or salvage for reuse a minimum of 65 percent of the nonhazardous construction and demolition waste.

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[28] California Department of General Services, Building Standards Commission. 2022. The 2022 California Green Building Standards Code, Title 24, Part 11. Website: https://www.dgs.ca.gov/BSC/Codes. Accessed April 2025.

- Outdoor Water Use in Landscape Areas. The Development would also comply with FMC Model Water Efficient Landscape Ordinance (Chapter 11, Article 1, Section 11-112).

- Recycling by Occupants—provide readily accessible areas that serve the entire building and are identified for the depositing, storage, and collection of non-hazardous materials for recycling, including (at a minimum) paper, corrugated cardboard, glass, plastics, organic water, and metals.

- Electrical Vehicle (EV) Charging—the Development will provide 35 EV Capable spaces in accordance with Table 5.106.5.3.1.[29]

The proposed Development, through the development review process, would be required to comply with CALGreen green building standards and the California Energy Code, which would ensure that the proposed Development would not result in wasteful, inefficient, or unnecessary consumption of energy resources.

In addition, no new development is proposed on the three properties currently occupied by single family homes within the annexation Project area. Should new development be proposed in the future, it would be required to comply with applicable standards for energy usage.

The proposed Development would be constructed using energy efficient modern building materials and construction practices, and the proposed Development would also use new modern appliances and equipment, in accordance with the Appliance Efficiency Regulations (Title 20, CCR Sections 1601 through 1608). The expected energy consumption during construction and operation of the proposed Development would be consistent with typical usage rates for similar commercial uses; however, energy consumption is largely a function of personal choice and the physical structure and layout of buildings. It can be assumed that implementation of the proposed Development would result in additional energy demand in the City; however, since the proposed Development would be located in a developed urban area and would be required to comply with the City's energy efficiency policies, including General Plan Policies which align with General Plan Objective RC-8, the proposed Development would not result in wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation. Therefore, the proposed Development would have a **less than significant impact** on energy resources during Development construction and operation. Therefore, the proposed Project would also have a **less than significant impact** on energy resources.

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[29] Ibid. Section 5.106.5.3.

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

Less than significant impact. The proposed Development would be required to comply with the CALGreen Code (CCR Title 24, Part 11) and the California Energy Code (CCR Title 24, Part 6), which includes provisions related to insulation and design aimed at minimizing energy consumption.

The annexation Project site will retain three existing single-family residences. These residences are not located in areas designated for renewable energy infrastructure, and their inclusion in the annexation area is administrative in nature. No renewable energy facilities or policies would be adversely affected by the continued residential use of these parcels. Should new development at those properties be proposed in the future, it would be required to comply with applicable standards for energy usage. Therefore, the existing homes would not obstruct a state or local plan for renewable energy or energy efficiency.

Also, as discussed in Section VIII, Greenhouse Gas Emissions, the proposed Development would be consistent with the greenhouse gas and energy measures included in the General Plan and the greenhouse gas emissions impact thresholds recommended by the BAAQMD to ensure that the proposed Development would reduce its "fair share" of emissions needed to support State goals for long-term greenhouse gas emissions reductions and carbon neutrality. The recommendations and policies that would be implemented by the Development are outlined below.

A less than significant GHG impact would occur if the Development were consistent with all of the identified design standards evaluated below.

Natural Gas Usage. A less than significant GHG impact would occur if the Development does not include natural gas appliances or natural gas plumbing. The proposed Development proposes medical office uses and would not include natural gas. Therefore, the proposed Development would be consistent with this design criterion.

Energy Use. Under this design criterion, the Development must not result in any wasteful, inefficient, or unnecessary energy usage as determined by the analysis required under CEQA Section 21100(b)(3) and Section 15126.2(b) of the State CEQA Guidelines.

The proposed Development ***would*** comply with this design criterion. Development design and operation would comply with the latest California Energy Code (Title 24, Part 6) and California Green Building Standards Code (CALGreen, Title 24, Part 11), both of which have been adopted by the City of Fresno under Fresno Municipal Code Chapter 11, Article 1. These standards incorporate high-efficiency requirements for HVAC systems, building envelopes, insulation, lighting, and water heating, and also require electric vehicle (EV) readiness in the Development's parking lot. The Development is also

consistent with the City of Fresno General Plan (2014) and Climate Action Plan, which encourage energy efficiency and infill development to reduce overall energy demand.

Furthermore, the proposed Development would be constructed using energy efficient modern building materials and construction practices, and the proposed Development would also use new modern appliances and equipment, in accordance with the Appliance Efficiency Regulations (Title 20, CCR Sections 1601 through 1608). The Development design includes energy efficient design features and green building standards mandated by CALGreen. Therefore, the proposed Development would not conflict or obstruct state and local plans for energy efficiency and renewable energy, and the impact would be less than significant.

As stated above, the proposed Development would be consistent with Title 24 Green Building Standards and Energy Code which require renewable energy and energy efficient components for newly constructed buildings, additions to existing buildings, and alterations to existing buildings. In addition, the proposed Development would be consistent with the objective and implementing policies contained in General Plan Section 7.5–Energy Resources, which are presented, in part, below:

Objective:

RC-8 Reduce the consumption of non-renewable energy resources by requiring and encouraging conservation measures and the use of alternative energy sources.

Implementing Policies:

RC-8-a Existing Standards and Programs. Continue existing beneficial energy conservation programs, including adhering to the California Energy Code in new construction and major renovations.

RC-8-b Strive to reduce per capita residential electricity use to 1,800 kWh per year and nonresidential electricity use to 2,700 kWh per year per capita by developing and implementing incentives, design and operation standards, promoting alternative energy sources, and cost-effective savings.

RC-8-c Energy Conservation in New Development. Consider providing an incentive program for new buildings that exceed California Energy Code requirements by fifteen percent.

RC-8-e Energy Use Disclosure. Promote compliance with State law mandating disclosure of a building's energy data and rating of the previous year to prospective buyers and lessees of the entire building or lenders financing the entire building.

The proposed Development within the annexation Project would be consistent with California Green Building Standards and Energy Code, and would be consistent with the General Plan regarding energy resources. As a result the proposed Development would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. The three existing single family homes will remain as is, with no development proposed on those properties. Therefore, the proposed Project would have **less than significant impact** on a state or local plan for renewable energy or energy efficiency.

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VII. GEOLOGY AND SOILS – Would the project:				
a) Directly or Indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:			X	
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.				X
ii) Strong seismic ground shaking?			X	
iii) Seismic-related ground failure, including liquefaction?			X	
iv) Landslides?				X
b) Result in substantial soil erosion or the loss of topsoil?			X	
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?			X	

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?			X	
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?				X
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?		X		

Environmental Setting

The Annexation Property, including the proposed Development site, is situated in the City of Fresno General Plan area, which is located along the eastern margin of the southern San Joaquin Valley portion of the Great Valley Geomorphic Province of California. The San Joaquin Valley is bordered to the north by the Sacramento Valley portion of the Great Valley, to the east by the Sierra Nevada, to the west by the Coast Ranges, and to the south by the Transverse Ranges.

Fresno is in one of the more geologically stable areas of California and does not lie within a known active earthquake fault zone. Although a number of faults are located within the Sierra Nevada Mountain Range, none are considered active. The nearest active fault is located by Independence, CA, approximately 100 miles to the east along the Fresno County-Inyo County boundary. Overall, seismic-related concerns (including liquefaction and subsidence) are considered fairly minor for the Planning Area. [30] Also, the city is not located in an Alquist-Priolo Special Fault Study Zone, nor is it identified in a zone of special study around active faults.

[30] Fresno General Plan. 2014. Chapter 9.3–Seismic and Geologic Hazards, p. 9.24.

DISCUSSION

a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

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

No impact. The Alquist-Priolo Earthquake Fault Zoning Act went into effect in March 1973. Since that time, the Act has been amended 11 times. The purpose of the Act, as provided in California Geological Survey (CGS) Special Publication 42 (SP 42), is to prohibit the location of most structures for human occupancy across the traces of active faults and to mitigate thereby the hazard of fault-rupture. The Act was renamed the Alquist-Priolo Earthquake Fault Zoning Act in 1994, and, at that time, the originally designated "Special Studies Zones" was renamed the "Earthquake Fault Zones." The City of Fresno Planning Area has not been identified as within a zone of special study around active faults, including an Alquist-Priolo Special Fault Study Zone.[31] Consequently, the proposed Project would not 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. Therefore, the proposed Project would have **no impact** on any fault located on an Alquist-Priolo Special Fault Study Zone Map.

ii. Strong seismic ground shaking?

Less than significant impact. Although Fresno residents could feel the effects of a large seismic event on one of the active or potentially active fault zones in the northern California region, as a mandatory condition of Project approval, the City will require the proposed Development be constructed in accordance with the California Green Building Standards Code/City Building Code. The California Green Building Standards Code/City Building Code are designed to reduce significant adverse effects associated with strong seismic ground shaking. Seismic design requirements contained in the Codes would be applied to the construction of the proposed Development. Therefore, through compliance with California and City building and seismic design and development code, the proposed Project would not directly or indirectly cause potential substantial adverse effects related to strong seismic ground shaking, and would have a **less than significant impact** on the potential for risk of loss, injury, or death from strong seismic ground shaking from nearby

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[31] United States Geological Survey (USGS).2020. National Water Information System Mapper. Website: https://maps.waterdata.usgs.gov/mapper/index.html. Accessed April 2025.

events.

iii. Seismic-related ground failure, including liquefaction?

Less than significant impact. Secondary hazards from earthquakes include rupture, seiche, landslides, liquefaction, and subsidence. Since there are no known faults within the immediate area, ground rupture from surface faulting should not be a potential problem. Liquefaction potential (sudden loss of shear strength in a saturated, cohesionless soil) should be low since groundwater data from wells in the vicinity indicate that groundwater is approximately 70 feet below ground surface (bgs).[32] In addition, review of the California Department of Conservation Earthquake Zones of Required Investigation interactive map indicates that the proposed Project is not located in or near a liquefaction hazards area. Furthermore, the Fresno General Plan states "Overall, seismic-related concerns (including liquefaction and subsidence) are considered fairly minor for the Planning Area."[33] Accordingly, the proposed Project would not directly or indirectly cause potential substantial adverse effects related to seismic-related ground failure, including liquefaction. Therefore, the Project would have a **less than significant impact** on the potential for risk of loss, injury, or death from seismic-related ground failure, including liquefaction.

iv. Landslides?

No impact. The Development site is relatively level, with a slight southwest to northeast incline ranging from 361 feet above sea level (ASL) in the southwest quadrant to 365 feet ASL in the northeast quadrant.[34] In addition, review of the California Department of Conservation Earthquake Zones of Required Investigation interactive map indicates that the proposed Project is not located in or near a landslide hazards area. The proposed Project has no landslide topography, and the site is not located in or near a landslide hazards area. As a result, the proposed Project would not directly or indirectly cause potential substantial adverse effects related to landslides. Therefore, the proposed Project would have **no impact** on the potential for risk of loss, injury, or death from landslides at the Development site.

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

Less than significant impact. The Development would involve excavation, grading, and construction activities that would disturb soil and leave exposed soil on the ground surface. Common means of soil erosion from construction sites include water, wind, and

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[32] United States Geological Survey (USGS).2020. National Water Information System Mapper. Website: https://maps.waterdata.usgs.gov/mapper/index.html. Accessed April 2025.

[33] Fresno General Plan. 2014. Chapter 9.3–Seismic and Geologic Hazards, p. 9.24.

[34] Google Earth Pro. Accessed April 2025.

tracking off-site by vehicles.

However, the Development would be subject to the National Pollution Discharge Elimination System (NPDES) permitting regulations, including the development and implementation of a Stormwater Pollution Prevention Plan (SWPPP). The proposed Development's construction contractor would be required to prepare and implement a SWPPP and associated best management practices (BMPs) during grading and construction. Types of BMPs that are incorporated in SWPPPs and will help minimize impacts from soil erosion include:

- Erosion controls: Cover and/or bind soil surface to prevent soil particles from being detached and transported by water or wind. Erosion control BMPs include mulch, soil binders, and mats.
- Sediment controls: Filter out soil particles that have been detached and transported in water. Sediment control BMPs include barriers, and cleaning measures such as street sweeping.
- Tracking controls: Tracking control BMPs minimize the tracking of soil offsite by vehicles; for instance, stabilizing construction roadways and entrances/exits.

Adherence to the BMPs in the SWPPP and adherence to local and state codes and requirements for erosion control and grading during construction would reduce, prevent, or minimize soil erosion from Development-related grading and construction activities. Therefore, the proposed Project would have a **less than significant impact** on soil erosion or loss of topsoil from Development-related grading and construction activities.

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?

Less than significant impact. Hazards from liquefaction are addressed above in Section a. iii, and landslide hazards are addressed in Section a. iv. The following is a discussion of the potential impacts resulting from other site geologic and soil conditions:

Lateral Spreading. Lateral spreading is a phenomenon that occurs in association with liquefaction and includes the movement of non-liquefied soil materials. Due to the low risk of liquefaction on the Project site, lateral spreading is not considered a hazard to the site. Therefore, the proposed Project is expected to have a **less than significant impact** related to lateral spreading.

Subsidence. The major cause of ground subsidence is the excessive withdrawal of groundwater. Soils with high silt or clay content are particularly susceptible to subsidence. According to the USGS Areas of Subsidence in California Map, the proposed Project is

not located in or near a region experiencing subsidence.[35] Additionally, the proposed development Project would connect to the municipal water system provided by City of Fresno Department of Public Utilities (DPU), and does not propose any groundwater withdrawal that would create or worsen ground subsidence. Two of the three existing single-family homes included in the annexation are connected to the municipal water system, with the third utilizing an existing well. Importantly, these homes are not being modified, expanded, or redeveloped as a result of the Project. Therefore, they would represent baseline or existing conditions, not new sources of potential impacts to ground subsidence. Furthermore, although subsidence or collapse is a significant concern in western Fresno County, as well as other portions of the San Joaquin Valley, subsidence or liquefaction hazards are considered fairly minor concerns in the Fresno General Plan Planning Area.[36] Therefore, impacts associated with subsidence would be **less than significant**.

Collapsible Soils. Portions of the San Joaquin Valley have been subject to land subsidence or collapse due to groundwater and petroleum extraction. Damage caused by subsidence or collapse has been restricted principally to significant changes in gradients of canals and aqueducts, and breakage of deep-water well casings. Within the San Joaquin Valley, subsidence or collapse is concentrated in the southern part and the west side of the valley where rainfall is sparse and groundwater recharge is minimal. Although subsidence or collapse is a significant concern in western Fresno County, as well as other portions of the San Joaquin Valley, the City of Fresno Planning Area is not known to be subject to such subsidence or collapse hazards.

Furthermore, development projects in the City are subject to FMC Section 11-101, which incorporates the California Building Code (CBC). Chapter 16–Structural Design–of the CBC addresses site-specific geotechnical requirements including the design load-bearing values of soils, as well as other seismic-related requirements for construction.[37]

Therefore, because the proposed Development is not located in an area known to experience collapsible soils or subsidence and would be subject to the building design requirement of the CBC, the proposed Project would have a **less than significant impact** related to collapsible soils at the development site.

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

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[35] United States Geological Survey (USGS).2020. Areas of Subsidence in California Map. Website: https://ca.water.usgs.gov/land_subsidence/california-subsidence-areas.html. Accessed April 2025.

[36] Fresno General Plan. 2014. Chapter 9.3–Seismic and Geologic Hazards.

[37] California Department of General Services, Building Standards Commission. 2022 California Building Code. Chapter 16 Structural Design. Website: https://www.dgs.ca.gov/BSC/Codes. Accessed April 2025

property?

Less than significant impact. Expansive soils have the potential to undergo volume change, or shrinkage and swelling, with changes in soil moisture. As expansive soils dry, the soil shrinks; when moisture is reintroduced into the soil, the soil swells.

Per the United States Department of Agriculture Natural Resources Conservation Service's soil map tool, soils at the project site consist of: Hanford fine sandy loam with clay loam substratum, Ramona sandy loam, and Visalia sandy loam with clay loam substratum with 0 to 3 percent slopes. The properties of these soil types are classified as well drained soils which means they have a low availability for water storage, and are unlikely to expand[38]. . development projects in the City are subject to FMC Section 11-101, which incorporates the 2022 CBC, Title 24, Part 2. Chapter 16–Structural Design of the CBC addresses site-specific geotechnical requirements including the design load-bearing values of soils, as well as other seismic-related requirements for construction.[39] Compliance with the CBC requires that geotechnical design of the proposed Development minimize or eliminate potential impacts related to expansive soils. Additionally, the three single-family homes that currently exist within the Project site are not being modified, expanded, or redeveloped as a result of the Development or the Project—they would represent baseline or existing conditions, not new sources of potential impacts to expansive soils. Therefore, the risk of expansive soil affecting the proposed Project would be **less than significant**.

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

No impact. The proposed Development is required to connect to City sewer services. The existing single family homes are not connected to city sewers and use existing septic systems. As noted in the Utilities section, the Department of Public Utilities has reviewed the project and conditioned specific construction requirements for extending sewer lines to the development project site. Those lines would also be available to the existing home parcels in the annexation area should they be developed in the future. If the three properties are developed in the future, they would be required to connect to City services.

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[38] USDA Natural Resources Conservation Service. Natural Resources Conservation Service Soil Map Accessed August 2025.

[39] California Department of General Services, Building Standards Commission. 2022 California Building Code. Chapter 16 Structural Design. Website: https://www.dgs.ca.gov/BSC/Codes. Accessed April 2025.

The Development Project site is to be served by a wastewater conveyance system maintained by the City of Fresno along Nees Avenue.[40] Wastewater from the City's collection system is treated at the City's wastewater treatment plant. The proposed Development would not involve the use of septic tanks or alternative wastewater disposal systems. Therefore, the proposed Project would have **no impact** related to soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems.

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

Less than significant impact with mitigation incorporated. The Holocene-age fan deposits at and near the surface are typically considered to have a low sensitivity for significant paleontological resources due to the relatively young age of the deposits. Paleontological resources have been documented from early Holocene- to Pleistocene-age to Modesto Formation sediments in Fresno County, which may be present at depth within the Development site. However, the Development would comply with **Mitigation Measure GEO-1** (below) in order to avoid inadvertent impacts to unknown paleontological resources. Implementation of **Mitigation Measure GEO-1** would reduce potential impacts to paleontological resources to **less than significant with mitigation incorporated.**

Mitigation Measure

MM GEO-1: Subsequent to a preliminary City review of the project grading plans, if there is evidence that a project will include excavation or construction activities within previously undisturbed soils, a field survey and literature search for unique paleontological/ geological resources shall be conducted. The following procedures shall be followed:

- If unique paleontological/geological resources are not found during either the field survey or literature search, excavation and/or construction activities can commence. In the event that unique paleontological/geological resources are discovered during excavation and/or construction activities, construction shall stop in the immediate vicinity of the find and a qualified paleontologist shall be consulted to determine whether the resource requires further study. The qualified paleontologist shall make recommendations to the City on the measures that shall be implemented to protect the discovered resources, including but not limited to, excavation of the finds and evaluation of the finds. If the resources are determined

[40] City of Fresno Department of Public Utilities. 2015. Wastewater Collection System Master Plan Update. https://www.fresno.gov/wp-content/uploads/2023/05/2015CollectionSystemMasterPlanUpdate2015FINAL-1.pdf. Reviewed April 2025.

to be significant, mitigation measures shall be identified by the monitor and recommended to the Lead Agency. Appropriate mitigation measures for significant resources could include avoidance or capping, incorporation of the site in green space, parks, or open space, or data recovery excavations of the finds. No further grading shall occur in the area of the discovery until the Lead Agency approves the measures to protect these resources. Any paleontological/geological resources recovered as a result of mitigation shall be provided to a City-approved institution or person who is capable of providing long-term preservation to allow future scientific study.

- If unique paleontological/geological resources are found during the field survey or literature review, the resources shall be inventoried and evaluated for significance. If the resources are found to be significant, mitigation measures shall be identified by the qualified paleontologist. Similar to above, appropriate mitigation measures for significant resources could include avoidance or capping, incorporation of the site in green space, parks, or open space, or data recovery excavations of the finds. In addition, appropriate mitigation for excavation and construction activities in the vicinity of the resources found during the field survey or literature review shall include a paleontological monitor. The monitoring period shall be determined by the qualified paleontologist. If additional paleontological/geological resources are found during excavation and/or construction activities, the procedure identified above for the discovery of unknown resources shall be followed.

The proposed Development shall implement and incorporate the geology and soils related mitigation measure as identified in the attached Project Specific Mitigation Monitoring Checklist dated April 23, 2025.

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

Environmental Setting

The annexation Project, which includes the proposed Development of 34,000 square feet (sf) of medical and office space, is located within the jurisdiction of the SJVAPCD, which regulates air quality in the SJVAB.

The primary source of greenhouse gases (GHGs) is fossil fuel use. The Intergovernmental Panel on Climate Change has identified four major GHGs—water vapor, carbon dioxide (CO_2), methane (CH_4), and ozone (O_3)—that are the likely cause of an increase in global average temperatures observed within the 20th and 21st centuries. Other GHGs identified by the Intergovernmental Panel that contribute to global warming to a lesser extent include nitrous oxide (N_2O), sulfur hexafluoride (SF_6), hydrofluorocarbons, perfluorocarbons, and chlorofluorocarbons.

The City of Fresno does not have a current greenhouse gas reduction plan, and the SJVAPCD also does not have adopted thresholds of significance for greenhouse gas emissions. Therefore, in the absence of any City or SJVAPCD specific guidelines or thresholds, this analysis evaluates the proposed Development for consistency with the Bay Area Air Quality Management District (BAAQMD) Justification Report: CEQA Thresholds for Evaluating the Significance of Climate Impacts from Land Use Projects and Plans (Justification Report).

DISCUSSION

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

Less than significant impact. The proposed annexation Project includes three properties with existing single family homes that are not proposed for new development, and are included in the scope of the annexation in order to not leave a remainder portion of the County island. As such, their energy consumption and associated GHG emissions are part of existing baseline conditions. These homes are not anticipated to result in a substantial increase in GHG emissions, nor would they conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. Therefore, the retention of these residences within the Project area would not result in a significant impact on the environment related to greenhouse gas emissions.

The *State CEQA Guidelines* indicate that a project would normally have a significant adverse greenhouse gas emission impact if the project would:

- Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment; or
- Conflict with an applicable plan, policy, or regulation adopted for the purpose of reduction the emissions of greenhouse gases.

Section 15064.4 of the *State CEQA Guidelines* states that: "A lead agency shall make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate the amount of greenhouse gas emissions resulting from a project." In performing that analysis, the lead agency has discretion to determine whether to use a model or methodology to quantify greenhouse gas emissions, or to rely on a qualitative analysis or performance-based standards. In making a determination as to the significance of potential impacts, the lead agency then considers the extent to which the project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting, whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project, and the extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions.

The City of Fresno does not have a current greenhouse gas reduction plan, and the SJVAPCD also does not have adopted thresholds of significance for greenhouse gas emissions. Therefore, in the absence of any City or SJVAPCD specific guidelines or thresholds, this analysis evaluates the proposed Development using BAAQMD thresholds of significance.

The proposed Development would produce combustion emissions from various sources. During construction, GHGs would be emitted through the operation of construction equipment and from worker and builder supply vendor vehicles, each of which typically

use fossil-based fuels to operate. The combustion of fossil-based fuels creates GHGs such as CO_2, CH_4, and N_2O. Furthermore, CH_4 is emitted during the fueling of heavy equipment. Exhaust emissions from on-site construction activities would vary daily as construction activity levels change.

The SJVAPCD does not have an adopted threshold of significance for construction-related GHG emissions. However, lead agencies are encouraged to quantify and disclose GHG emissions that would occur during construction. Using CalEEMod, it is estimated that the annual emissions associated with construction of the proposed Development would be approximately 107 metric tons (MT) of CO_2e (carbon dioxide equivalent) per year. Construction GHG emissions were amortized over the life of the Development (assumed to be 30 years) and added to the operational emissions. When annualized over the life of the Development, amortized construction emissions would be approximately 3.57 MT CO_2e per year.

Operational Greenhouse Gas Emissions. Long-term GHG emissions are typically generated from mobile sources (e.g., vehicle and truck trips), area sources (e.g., maintenance activities and landscaping), indirect emissions from sources associated with energy consumption, waste sources (land filling and waste disposal), and water sources (water supply and conveyance, treatment, and distribution). Mobile-source GHG emissions would include Development-generated vehicle trips to and from the Development. Area-source emissions would be associated with activities such as landscaping and maintenance on the Development site. Energy source emissions would be generated at off-site utility providers as a result of increased electricity demand generated by the Development. Waste source emissions generated by the proposed Development include energy generated by land filling and other methods of disposal related to transporting and managing Development generated waste. In addition, water source emissions associated with the proposed Development are generated by water supply and conveyance, water treatment, water distribution, and wastewater treatment.

Following guidance from the BAAQMD, GHG emissions for operation of the Development were calculated using CalEEMod. Based on the analysis results, summarized in Table 1, the proposed Development would result in emissions of approximately 873.58 MT CO_2e per year, below the BAAQMD's recommended threshold of 1,100 MT CO2e per year. These estimated emissions are provided for informational purposes, and the significance of the proposed Development is further analyzed on the following pages.

Table 1: Greenhouse Gas Emissions (Unmitigated)

	Operational Emissions (metric tons per year)			
Emission Type	**CO_2**	**CH_4**	**N_2O**	**CO_2e**
Mobile Sources	588	0.04	0.03	600
Area Sources	0.50	0.005	0.005	0.50
Energy Sources	146	0.02	0.005	147
Water Sources	3.02	0.14	0.005	7.51
Waste Sources	32.9	3.28	0.00	115
Amortized Construction Emissions				3.57
Total Operational Emissions				**873.58**
BAAQMD Significance Threshold				1,100
Exceed Significance Threshold				**No**

Source: CalEEMod version 2022.1.1.29
Compiled by: Bargas April 2025
CH_4 = methane CO_2e = carbon dioxide equivalent
CO_2 = carbon dioxide N_2O = nitrous oxide

In the absence of any City or SJVAPCD specific guidelines or thresholds, this analysis evaluates the proposed Development for consistency with the BAAQMD Justification Report, which identifies project design elements as the applicable thresholds of significance. If a project is designed and built to incorporate design elements related to natural gas, energy, VMT, and EVs, then it would contribute its portion of what is necessary to achieve California's long-term climate goals — its "fair share" — and an agency reviewing the project under CEQA can conclude that the project would not make a cumulatively considerable contribution to global climate change.

Per the significance thresholds described above, a less than significant GHG impact would occur if the project were consistent with all the identified design standards, as evaluated below.

Natural Gas Usage. A less than significant GHG impact would occur if the Development does not include natural gas appliances or natural gas plumbing. The proposed Development proposes medical office buildings and would not include natural gas. Therefore, the proposed Development *would* be consistent with this design criterion.

Energy Use. Under this design criterion, the Development must not result in any wasteful, inefficient, or unnecessary energy usage as determined by the analysis required under CEQA Section 21100(b)(3) and Section 15126.2(b) of the State CEQA Guidelines.

The proposed Development *would* comply with this design criterion. Development design and operation would comply with the latest California Energy Code (Title 24, Part 6) and California Green Building Standards Code (CALGreen, Title 24, Part 11), both of which have been adopted by the City of Fresno under Fresno Municipal Code Chapter 11,

Article 1. These standards incorporate high-efficiency requirements for HVAC systems, building envelopes, insulation, lighting, and water heating, and also require electric vehicle (EV) readiness in the Development's parking lot. The Development is also consistent with the City of Fresno General Plan (2014) and Climate Action Plan, which encourage energy efficiency and infill development to reduce overall energy demand.

In addition, according to the CalEEMod emissions model prepared for this Development (Appendix G), total annual energy use is estimated at approximately 799,500 kWh of electricity and 1.36 million kBTU of natural gas—a total Energy Use Intensity (EUI) of 119.8kBTU/ft^2 which is generally in the range for similar developments, depending on factors like building design, operational hours, and energy efficiency measures.[41] Compliance with Title 24 standards would ensure that energy use is optimized through measures like efficient building envelopes, advanced HVAC systems, and lighting controls. The energy demand for the Development does not represent wasteful, inefficient, or unnecessary consumption, nor would it conflict with or obstruct applicable state or local plans for energy conservation or renewable energy development.

Furthermore, the proposed Development would be constructed using energy efficient modern building materials and construction practices, and the proposed Development would also use new modern appliances and equipment, in accordance with the Appliance Efficiency Regulations (Title 20, CCR Sections 1601 through 1608). The Development design includes energy efficient design features and green building standards mandated by CALGreen. A few such standards are listed below

- Stormwater Pollution Prevention—the Development will prepare and implement a Stormwater Pollution Prevention Plan (SWPPP) because the Development will disturb more than one acre of land, including Best Management Practices (BMPs) to prevent soil erosion and non-stormwater discharges.

- Grading and Paving—provide construction plans that indicate how site grading or a drainage system will manage all surface water flows to keep water from entering buildings.

- Construction Waste Reduction, Disposal, and Recycling—the Development will recycle and/or salvage for reuse a minimum of 65 percent of the nonhazardous construction and demolition waste.

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[41] Energy Star. U.S. Energy Use Intensity by Property Type. 2024.https://portfoliomanager.energystar.gov/pdf/reference/US%20National%20Median%20Table.pdf. Accessed April 2025.

- Outdoor Water Use in Landscape Areas. The Development would also comply with FMC Model Water Efficient Landscape Ordinance (Chapter 11, Article 1, Section 11-112).

- Recycling by Occupants—provide readily accessible areas that serve the entire building and are identified for the depositing, storage, and collection of non-hazardous materials for recycling, including (at a minimum) paper, corrugated cardboard, glass, plastics, organic water, and metals.

Electric Vehicle Requirements. Under this design criterion, the project must demonstrate consistency with the Tier 2 measures for off-street EV parking included in the most recently adopted version of the CALGreen Code. The proposed Development would comply with this design criterion, providing 35 EV Capable spaces in accordance with Table 5.106.5.3.1.[42]

Vehicle Miles Traveled. As discussed above, a development that meets a locally adopted SB 743 VMT target would be considered to have a less than significant GHG emissions impact from transportation sources.

As required under CEQA Guidelines §15064.3 and the City of Fresno VMT Thresholds (2020), a VMT analysis was prepared for the proposed Development (Peters Engineering Group, 2023). The Development site is located in a screened area (Figure 7) with existing VMT per employee below the Fresno County regional average. This means the Development site is in an area where people typically drive less to get to and from work than the average in Fresno County. That means this location is considered a good place to build offices, because it's already close to homes, transit, and major roads—it won't add a lot of new car travel or traffic. Accordingly, the proposed Development would not result in a significant VMT-related transportation impact.

The proposed Development **would** be consistent with all BAAQMD project design elements related to energy, VMT, and EVs, which demonstrates that the Development is achieving its "fair share" of GHG emission reductions. Therefore, the proposed Development would not generate substantial greenhouse gas emissions (see Table 1), or conflict with plans, policies, or regulations adopted for the purpose of reducing GHG emissions. Therefore, the proposed Project, including the proposed Development, would have a **less than significant impact** on 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?

Less than significant impact. The proposed annexation Project is consistent with the Commercial Community General Plan land use designation, and the Project is pre-zoned to be consistent with the General Plan upon approval of the Annexation.

The existing single-family homes located within the proposed annexation area are not proposed for redevelopment and will remain in their current use. As such, their energy consumption and associated GHG emissions are part of existing baseline conditions and would not represent potential impacts from new emissions. As such, these would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. Therefore, the retention of these residences would not result in a significant impact to an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

As shown in discussion a) above, the proposed Development and annexation Project would be consistent with the State's greenhouse gas reduction goals. Therefore, the proposed Project would not conflict with plans, policies, or regulations adopted for the purpose of reducing GHG emissions.

In addition, the proposed Development would be consistent with the applicable strategies from the BAAQMD Justification Report, therefore, emissions associated with the Development would not hinder the City's ability to meet the reduction targets outlined in SB 32 and the annexation Project would not result in substantial GHG emissions. Furthermore, the Project would not conflict with the State's GHG emissions reductions objectives embodied in any executive order, bill, or plan. Therefore, the proposed Project's incremental contribution to cumulative GHG emissions would not be cumulatively considerable.

Consequently, because the proposed Project would comply with existing State regulations adopted to achieve the overall GHG emissions reduction goals and would be consistent with applicable plans and programs designed to reduce GHG emissions, the proposed Project would have a **less than significant impact** on any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
IX. HAZARDS AND HAZARDOUS MATERIAL – Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			X	
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?			X	
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?			X	
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				X
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?			X	

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?			X	
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?			X	

Environmental Setting

Hazardous materials are routinely used, stored, and transported in the City Planning Area and are associated with industrial and commercial/retail businesses, as well as in educational facilities, hospitals, and households.

The Fresno County Health Department's Certified Unified Program Agency (CUPA) is responsible for implementing a unified hazardous materials and hazardous waste management regulatory program. The agency provides oversight of businesses that:

- Require Hazardous Materials Business Plans,
- Require California Accidental Release Prevention plans or Federal Risk Management Plans,
- Operate Underground Storage Tanks,
- Operate Aboveground Storage Tanks,
- Generate Hazardous Waste(s), or
- Have Onsite Treatment of Hazardous Waste(s)/Tiered Permits.

Compliance is achieved through routine inspections of all regulated facilities, and investigation of citizen-based complaints and inquiries regarding improper handling and/or disposal of hazardous materials and/or hazardous wastes. Hazardous waste

source reduction is a primary goal of the CUPA. Additionally, the agency provides oversight for the remediation of contaminated sites.[43]

Medical waste in the Planning area is managed under the California Waste Management Act (CWMA) by the California Department of Public Health. Materials managed by the CWMA include sharps (needles) and biohazardous waste.

DISCUSSION

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

Less than significant impact. Hazardous materials, as defined by the CCR, are substances with certain physical properties that could pose a substantial present or future hazard to human health or the environment when improperly handled, disposed, or otherwise managed. Hazardous materials are grouped into the following four categories, based on their properties:[44]

- Toxic - causes human health effects
- Ignitable - has the ability to burn
- Corrosive - causes severe burns or damage to materials
- Reactive - causes explosions or generates toxic gases

A hazardous waste is any hazardous material that is discarded, abandoned, or slated to be recycled. The criteria that define a material as hazardous also define a waste as hazardous. If improperly handled, hazardous materials and hazardous waste can result in public health hazards if released into the soil or groundwater or through airborne releases in vapors, fumes, or dust.

Hazardous materials are routinely used, stored, and transported in the Fresno General Plan Planning Area and are associated with industrial and commercial/retail businesses, as well as in educational facilities, hospitals, and households. Hazardous waste generators in the Planning Area include industries, businesses, public and private institutions, and households. Federal, state, and local agencies maintain comprehensive databases that identify the location of facilities using large quantities of hazardous materials, as well as facilities generating hazardous waste. Some of these facilities use certain classes of hazardous materials that require risk management plans to protect surrounding land uses.

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[43] Fresno County Public Health Department. 2025. Hazmat Compliance. https://www.fresnocountyca.gov/Departments/Public-Health/Environmental-Health/HazMat-Compliance-The-Designated-CUPA.

[44] California Code of Regulation. Title 19, Division 2, § 2730,

As stated above under Environmental Setting, the Fresno County Health Department's CUPA is responsible for implementing a unified hazardous materials and hazardous waste management regulatory program in the Planning Area. The agency provides oversight of businesses that:

- Require Hazardous Materials Business Plans,
- Require California Accidental Release Prevention plans or Federal Risk Management Plans,
- Operate Underground Storage Tanks, or
- Operate Aboveground Storage Tanks.

In addition, the City of Fresno Fire Department Hazardous Materials Response Team (HMRT) has embraced an all-hazards approach to emergency response to ensure that the Planning Area receives effective protection from the risk of hazardous materials releases.[45]

Furthermore, FMC Section 15-2514–Fire and Explosives Hazards states, in part:

- All activities, processes and uses involving the use of, or storage of flammable and explosive *materials* shall be provided with adequate safety devices against the *hazard* of fire and explosion in accordance with the Fire Code.
- The use, handling, storage and transportation of *hazardous* and extremely *hazardous materials* shall comply with the provisions of the California *Hazardous Materials* Regulations and the California Fire and Building Code, as well as the laws and regulations of the California Department of Toxic Substances Control (DTSC) and the County Environmental Health Agency.
- The use, handling, transportation, and storage of *hazardous* and extremely *hazardous materials* shall comply with the laws and regulations of Occupational Safety and Health Administration (OSHA), United States Department of Transportation (US DOT) and Environmental Protection Agency (EPA). Also add a requirement for compliance with all applicable federal and State laws, including, but not limited to, the *Hazardous Materials* Transportation Act of 1975, as may be amended.

In addition, the Fresno General Plan addresses hazardous materials in the Noise and Safety and Public Utilities and Services Elements with objectives and policies listed below:

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[45] Ibid.

- **Objective NS-4**: Minimize the risk of loss of life, injury, serious illness, and damage to property resulting from the use, transport, treatment, and disposal of hazardous materials and hazardous wastes.

- **Policy PU-3-d:** Review All Development Applications. Continue Fire Department review of development applications, provide comments and recommend conditions of approval that will ensure adequate on-site and off-site fire protection systems and features are provided.

- **Policy PU-3-e:** Building Codes. Adopt and enforce amendments to construction and fire codes, as determined appropriate, to systematically reduce the level of risk to life and property from fire, commensurate with the City's fire suppression capabilities.

- **Policy NS-4-e**: Compliance with County Program. Require that the production, use, storage, disposal, and transport of hazardous materials conform to the standards and procedures established by the County Division of Environmental Health. Require compliance with the County's Hazardous Waste Generator Program, including the submittal and implementation of a Hazardous Materials Business Plan, when applicable.

- **Policy NS-4-h**: Household Collection. Continue to support and assist with Fresno County's special household hazardous waste collection activities, to reduce the amount of this material being improperly discarded.

- **Policy NS-4-i**: Public Information. Continue to assist in providing information to the public on hazardous materials.

Construction Impacts. Construction activities associated with the proposed Development would involve the use of limited amounts of potentially hazardous materials, including but not limited to, solvents, paints, fuels, oils, and transmission fluids. However, only limited quantities of these materials are expected to be used during construction; therefore, in general, they would not be considered hazardous to the public at large. Also, all materials used during construction would be contained, stored, and handled in compliance with applicable standards and regulations established by the DTSC, the EPA, and OSHA. Furthermore, OSHA's construction standards require construction employers to have accident prevention programs, including emergency action plans with exit routes and fire prevention plans that provide for frequent and regular inspection of the jobsites, materials, and equipment by competent persons designated by the employers (29 Code of Federal Regulations [CFR], Part 1926). Therefore, compliance with DTSC, EPA, OSHA, US DOT, FMC requirements, and Fresno General Plan objectives and policies would ensure that potential impacts to the public or the environment that might occur due

to the routine transport, use, or disposal of hazardous materials during Development construction would be **less than significant**.

Operation Impacts. Common hazardous materials used in professional office buildings include retail quantities of bleach, paint, glue, and solvents. Waste considered hazardous from medical office buildings could include sharps (needles) and biohazardous waste.

The proposed Development would comply with the Fresno General Plan and all applicable federal, state, and local laws and regulations, including the CWMA, controlling the use, generation, storage, transport, and/or the disposal of hazardous materials during construction and operation. Therefore, potential impacts occurring from the routine transport, use, or disposal of hazardous materials from the proposed Development would be **less than significant**.

Typical household hazardous materials, such as cleaning products, paints, and fuels, may be present in small quantities within existing single-family residences in the Project area. Generally, these substances are used and stored in accordance with manufacturer guidelines and local regulations. Given the limited quantities and household-scale use, the potential for a significant hazard to the public or the environment from the existing single-family residences in the Project area is considered **less than significant**.

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

As stated above in response to question **a)**, The proposed Development would comply, through conditions of approval and inspections, with applicable federal, state, local laws and regulations, and Fresno General Plan policies controlling the use, generation, storage, transport, or disposal of hazardous materials. In addition, as stated above, typical household hazardous materials, such as cleaning products, paints, and fuels, may be present in small quantities within existing single-family residences in the Project area. Generally, absent evidence to the contrary, these substances would be used and stored in accordance with manufacturer guidelines and local regulations, and would not represent, given the limited quantities and household-scale use, a significant hazard to the public or environment due to an unauthorized release of reportable quantities of hazardous materials. Therefore, the Project would have a **less than significant impact** on conditions that would lead to an unauthorized release of hazardous materials causing harm to the public or the environment.

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

Less than significant impact. The closest school to the Project site is Garfield Elementary School, 1315 N Peach Avenue, Clovis, CA 93619, located approximately 0.57 miles east of the Project site. The closest proposed schools are Clovis South High School, and Phillip V. Sanchez Intermediate School, both located approximately 8 miles southeast of the Project site at 2501 N. Highland Avenue, Fresno, 93727 [46]

Construction of the proposed Development could result in the use, storage, and transport of reportable quantities of hazardous materials. However, the proposed Project site would be zoned Commercial Community upon annexation, a district intended for *commercial* development that primarily serves local needs such as convenience shopping and offices, not occupancies that use, store, or generate significant quantities of hazardous materials. In addition, as stated above, typical household hazardous materials, such as cleaning products, paints, and fuels, may be present in small quantities within existing single-family residences in the Project area–given the limited quantities and household-scale use, these residences would not be expected to emit hazardous emissions or handle hazardous or acutely hazardous materials. Therefore, it is unlikely that operation of the proposed Development would result in the use, storage, transport, or disposal of reportable quantities of hazardous or acutely hazardous materials. In any event, as stated above in response to question **a)**, both Development construction and operation would comply with all applicable federal, state, local laws and regulations, and Fresno General Plan policies controlling the use, generation, storage, transport, and/or the disposal of hazardous materials, which would reduce the potential for the proposed Project to emit of hazardous materials or acutely hazardous, substances, or waste within one-quarter mile of an existing school to a **less than significant impact**.

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

No impact. A review of the DTSC Hazardous Waste and Substance Sites List (Envirostor) indicated that the proposed Project is not included as a hazardous material site.[47]

Therefore, because the proposed Project site is not a DTSC-listed hazardous material site, and the site has no evidence of recognized environmental conditions, the Project would have **no impact** on creating a significant hazard to the public or the environment as a known hazardous material site.

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[46] Clovis Unified School District. Website: https://www.cusd.com/CUSD.aspx. Accessed April 2025.

[47] California Department of Toxic Substances Control (DTSC). Hazardous Waste and Substance Sites List (Envirostor). Website: https://www.envirostor.dtsc.ca.gov/public/. Accessed April 2025.

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

Less than significant impact. The project is not located in an influence area of the Fresno County Airport Land Use Compatibility Plan. The closest airport in the vicinity of the proposed Project is the Fresno Yosemite International Airport, located approximately 4.65 miles south of the Project site. Therefore, because the Project site is located more than two miles from the closest airport, and is not located in any airport safety zone, the proposed Project would result in a **less than significant impact** on the safety of people residing or working in the Project site.

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

Less than significant impact. The California Emergency Services Act requires cities to prepare and maintain an Emergency Plan for natural, man-made, or war-caused emergencies that result in conditions of disaster or in extreme peril to life. The City's Police and Fire Departments are the lead agencies for all local emergency response efforts. The City's full-time Emergency Preparedness Officer (EPO) is responsible for ensuring that Fresno's emergency response plans are up-to-date and implemented properly. The EPO also facilitates cooperation between City departments and other local, State and Federal agencies that would be involved in emergency response operations. The City of Fresno Emergency Operations Center (EOC) also serves as the coordination and communication between the City of Fresno and Fresno County Operational Area EOC.

In addition, OSHA provides construction standards that require construction employers to have accident prevention programs, including emergency action plans with exit routes, and fire prevention plans that provide for frequent and regular inspection of the jobsites, materials, and equipment by competent persons designated by the employers (29 CFR 1926).

The adequacy of emergency access associated with the proposed Development will be analyzed and evaluated in detail through the environmental review process. The Development will be designed, constructed, and maintained in accordance with applicable standards and policies contained in the General Plan and Development Code, including providing emergency vehicular access to ensure that adequate emergency ingress and egress would be maintained. Also, construction activities that may temporarily restrict vehicular traffic, if any, would be required to implement appropriate measures to facilitate the passage of persons and vehicles through/around any required road closures. As for the three existing single-family residences in the Project area, the

annexation and proposed Development would not alter existing access roads, emergency routes, or introduce new physical barriers to these homes. Consequently, the presence of those homes would not be expected to conflict with existing emergency plans. Therefore, because the proposed Development would provide adequate access for emergency vehicles, including adequate vertical clearance, and comply with federal, state, and local regulations and policies contained in the General Plan, and no change to the existing homes would occur as a result of the Project, the proposed Project would have a **less than significant impact** on an adopted emergency response plan or emergency evacuation plans.

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

Less than significant. Wildland fires are those fires that occur on lands with natural vegetation such as forest, brush, and grass. Although the City is located near high and very high fire hazard designated areas, given that the Planning Area is largely urbanized or working agricultural land and lacks steep topographies, wildfire threats are minimal.[48] In addition, according to the California Department of Forestry and Fire Protection (CAL FIRE) Draft Fire Hazard Severity Zone in Local Responsibility Area (LRA) Map for Fresno County,[49] the proposed Project site is not located in a Fire Hazard Severity Zone. Consequently, the Project would have a **less than significant impact** on the exposure of people or structures to a significant risk of loss, injury or death involving wildland fires.

[48] City of Fresno.2014. Fresno General Plan. 9.5–Wildland Fire Hazards.

[49] California Department of Forestry and Fire Protection (CAL FIRE). 2007. Fresno County Draft Fire Hazard Severity Zones in LRA. October 2. Website: https://osfm.fire.ca.gov/divisions/community-wildfire-preparedness-and-mitigation/wildfire-preparedness/fire-hazard-severity-zones/fire-hazard-severity-zones-map/. Accessed August 2023.

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
X. HYDROLOGY AND WATER QUALITY – Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?			X	
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?			X	
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surfaces, in a manner which would:			X	
i) Result in a substantial erosion or siltation on- or off-site;			X	
ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site:			X	
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or			X	
iv) impede or redirect flood flows?			X	

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?			X	
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?				X

Environmental Setting

The City of Fresno is a co-permittee in the Phase 1 National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges From Municipal Separate Storm Sewer Systems (MS4s). This Phase 1 MS4 Permit requires that the City and its co-permittees implement water quality and watershed protection measures for all development projects. The waste discharge requirements contained in the NPDES Permit have been designed to be consistent with the water quality standards and goals established in the Central Valley RWQCB's Basin Plan. The Phase 1 MS4 Permit prohibits discharges from violating applicable water quality standards or creating a nuisance or water quality impairment in receiving waters.[50]

DISCUSSION

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Less than significant impact. The Project includes both Annexation of the approximately 10.55-acre Annexation Property and construction of the proposed Development, which would involve the removal of vegetation cover, grading, stockpiling, excavation, and other site-preparation activities on an approximately 3.3-acre site that could temporarily increase runoff, erosion, and sedimentation. However, any development project disturbing one or more acres of soil must obtain coverage under the NPDES General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (General Permit Order WQ 2022-0057-DWQ, NPDES No.

[50] California Central Valley Regional Water Quality Control Board. 2014. ORDER R5-2013-0080.

CAS000002).[51] This Order, which was adopted on September 8, 2022, and became effective on September 1, 2023, supersedes Order 2009-0009-DWQ as amended by Order 2010-0014-DWQ and 2012-0006-DWQ. The General Permit Order requires the development and implementation of a site-specific SWPPP describing BMPs the discharger would use to prevent and retain storm water runoff. Common BMPs to limit pollution in stormwater runoff from construction sites include maintaining or creating drainages to convey and direct surface runoff away from bare areas, and installing physical barriers such as berms, silt fencing, waddles, straw bales, and gabions.

Additionally, Chapter 6, Article 7, Section 6-714 of the FMC further reduces impacts on the capacities of existing storm drain facilities and mitigates water quality impacts from new development and redevelopment by adopting BMPs which reduce pollutants in urban storm water discharges to the maximum extent practicable, and by effectively prohibiting non-storm water discharges to the storm drain system.

Therefore, through compliance with the NPDES General Permit Order and the FMC, the proposed Project would have a **less than significant impact** on water quality standards or waste discharge requirements and would not violate or otherwise substantially degrade surface or groundwater quality.

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

Less than significant impact. The City relies on groundwater from the North Kings Subbasin; surface water from Central Valley Project (CVP) through a contract with the United States Bureau of Reclamation (USBR); Kings River water through a contract with Fresno Irrigation District (FID); and recycled water.[52]

Two of the existing single family homes are connected to the municipal water system, the third uses wells. If the three properties are developed in the future, they would be required to connect to City services.

The proposed Development would connect to the municipal water system provided by City of Fresno DPU, and would represent anticipated future development in accordance with the General Plan upon which water demand projections are based. In addition, the

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[51]. California State Water Resources Control Board. September 2022. National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (General Permit). Website: https://www.waterboards.ca.gov/water_issues/programs/stormwater/construction/general_permit_reissuance.html. Accessed April 2025.

[52] City of Fresno Department of Public Utilities. July 2021. 2020 Urban Water Management Plan, p. ES-5.

proposed Development would implement mandated energy efficient design, including drought tolerant landscaping. Therefore, the proposed Project would have a **less than significant impact** on groundwater supplies and would not substantially interfere with groundwater recharge in the Planning Area.

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

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

Less than significant impact. During construction of the proposed Development, excavated soil would be exposed and disturbed, drainage patterns would be temporarily altered, and there would be an increased potential for soil erosion and sedimentation compared to existing conditions. The proposed Development would be controlled by an NPDES General Permit Order that requires the preparation of a SWPPP and implementation of construction BMPs designed to prevent substantial erosion or siltation on- or off-site during construction. Although development of the site would create new impervious surfaces, after construction (during operation) the City of Fresno would require the Development to implement post-construction stormwater management standards through a Post-Construction Stormwater Quality Management Plan (SQMP), which would include:

- Low Impact Development (LID) requirements.
- Site design measures (e.g., pervious pavement, swales, biofiltration).
- Source control BMPs (e.g., covered dumpsters, signage).
- Treatment control BMPs where necessary.

Therefore, compliance with the site-specific SWPPP and the SQMP would ensure that the proposed Project would have a **less than significant impact** on 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?

Less than significant impact. During construction of the proposed Development, soil would be disturbed and compacted, and drainage patterns would be temporarily altered, which can increase the volume and velocity of stormwater runoff and increase the potential for localized flooding compared to existing conditions. Construction of the proposed Development would be controlled by an NPDES General Permit Order that requires the preparation of a SWPPP and implementation of construction BMPs to control and direct surface runoff on-site. With adherence to the General Permit, potential construction impacts related to an increase in the rate or amount of surface runoff in a

manner that would result in flooding on-site or off-site would be **less than significant.**

Operation of the proposed development Project would increase impervious surfaces that would increase stormwater runoff rates and volumes. The Fresno Metropolitan Flood Control District (FMFCD) is responsible for developing and implementing the Storm Drainage and Flood Control Master Plan (SDFCMP) for the City. The FMFCD works with developers and the City to implement the storm drainage system to collect and dispose of the increased runoff rates and volumes and prevent flooding as the result of the development and grading of land. Adherence to the FMFCD SDFCMP would ensure that operation of the proposed Development would not substantially increase the rate or amount of surface runoff in a manner, which would result in flooding on- or off-site, and potential impacts would be **less than significant.**

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

Less than significant impact. The proposed Development would increase impervious surfaces at the Project site, however, with implementation of a SWPPP and a SQMP, which would require execution of BMPs for controlling pollution sources during construction and operation, compliance with the SDFCMP, and implementation of the NPDES Permit, the proposed Development would not exceed capacity of stormwater drainage systems or generate additional sources of polluted runoff. The FMFCD reviewed the proposed Development and provided conditions of approval that identify how drainage at the site shall be directed to the nearest master plan inlet, how the project shall reduce any increased potential runoff from the proposed use to accommodate the existing drainage system, required the project to improve storm runoff quality from roof drains, and assessed drainage fees. They also stated the project is not in a flood prone area. The FMFCD will review the future grading plans for the Development and determine if construction of the Development will satisfy the requirements of the SDFCMP. Additionally, the Project Applicant would pay the City a Drainage Fee to address impacts related to the increased amount of surface runoff resulting from the proposed Development. Therefore, the proposed Project would have a **less than significant impact** on the creation or contribution to surface water runoff that would exceed the capacity of existing or planned stormwater drainage systems.

iv. Impede or redirect flood flows?

Less than significant impact. The proposed Project is located in Flood Zone X (shaded), an area of moderate flood risk.[53] In addition, there are no water features on or

[53] FEMA Flood Map Service Center. Effective 2/18/2009. FEMA Map Panel Map No. 06019C1580H. Website: https://msc.fema.gov/portal/search. Accessed April 2025.

near the Project site, making flood flows on or off-site unlikely. Therefore, the proposed Project would not substantially alter the existing drainage pattern of the site such that it would impede or redirect flood flows, and the potential impact would be **less than significant.**

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

Less than significant impact. As stated above, the proposed Project is located in Flood Zone X–an area of moderate flood risk. Also, the Project site is located over 110 miles east of the Pacific Ocean; therefore, there is no risk of tsunami. In addition, the Project site is not located in an area prone to seismic activity, and the site is not located down-gradient from bodies of water that could result in seiches. Therefore, the proposed Project would have a **less than significant impact** on the potential for flood hazards, tsunamis, or seiches that could release pollutants due to site flooding.

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

No impact. The City is located within the Kings Subbasin, which is part of the larger San Joaquin Valley Groundwater Basin. The planning documents regarding water resources for the City include the Kings Basin Water Authority Integrated Regional Water Management Plan, the City of Fresno Urban Water Management Plan, the Fresno-Area Regional Groundwater Management Plan, and the City of Fresno Metropolitan Water Resource Management Plan. As noted above in response to question **b)**, the proposed Development would be required to adhere to NPDES drainage control requirements during construction, as well as to FMC and FMFCD drainage control requirements. As a result, the proposed Project would have **no impact** on the implementation of any water quality control plan or sustainable groundwater management plan.

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XI. LAND USE AND PLANNING – Would the project:				
a) Physically divide an established community?				X
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?				X

Environmental Setting

The proposed Project is located in the City of Fresno Planning Area, which is the geographic area for which the approved General Plan establishes policies about future growth. The Planning Area established by the City includes all areas within the City's current city limits, including the areas within the current SOI.

DISCUSSION

a) Physically divide an established community?

No impact. The approximately 10.55-acre Annexation Property, which includes the Development site, is currently improved with three single-family residences in the northern portion of the site. The proposed Development site is located in the southern portion of the Annexation Property, and is currently unimproved. The approved General Plan land use designation for the Annexation Property is Commercial Community. In addition, the Annexation Property is pre-zoned Commercial Community in anticipation of annexation approval. The Annexation Property is surrounded by land zoned for medium density and low density residential uses, and commercial uses.

The Development site is currently unimproved with no existing roads or pathways, and the proposed Development would not realign or separate any roads or other pathways, or impair pedestrian or vehicular access in the community in any way. Therefore, the Project would have **no impact** on an established community's pedestrian or vehicular mobility, and would not 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?

No impact. The proposed Annexation Property is not controlled by land use plans protecting biological resources such as a HCP, NCCP, or other adopted local, regional or state HCP. The proposed Annexation Property is not controlled by any agricultural use policies, such as a Williamson Act contract. In addition, the Development would comply with requirements promulgated by the SJVAPCD, the DTSC, the EPA, OSHA, and all local, state, and federal plans, policies, or regulation controlling land use within the City. The proposed Annexation Property's approved General Plan land use is Commercial Community, and is pre-zoned Commercial Community to be consistent with the General Plan if the annexation is approved. Consequently, the proposed Project would be consistent with the City's General Plan and Zoning designations and maps, and would comply with Development Code. Therefore, the proposed Project would have **no impact** on or conflict with any land use plan, policy or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XII. MINERAL RESOURCES – Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?				X
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?				X

Environmental Setting

Mineral resources, such as aggregate material, are necessary to support urban development, as all public and private projects utilize this material for roadway paving, structural elements, and hardscape, including sidewalks, curbing, and gutters. Within the City of Fresno, mineral resources are concentrated along the San Joaquin River Corridor.

The Surface Mining and Reclamation Act of 1975 (SMARA) is the primary California state law concerning mineral resources. SMARA provides for the reclamation of formerly mined lands and directs the California State Geologist to identify and map non-fuel mineral resources of the state in order to map where economically significant mineral deposits occur, or are likely to occur, based upon the best scientific data. Inventorying non-fuel mineral resources according to mineral land classifications is the responsibility of the CGS, the California Department of Conservation (DOC), and specifically the Mineral Resources Program.[54]In accordance with SMARA Article 4, Section 2761b, the California Mineral Land Classification System is broken into four Mineral Resource Zone (MRZ) categories:

1. **MRZ-1**, lands where geologic information indicates no significant mineral deposits,
2. **MRZ-2**, lands that contain identified mineral resources,

[54] California Department of Conservation (DOC). 2019. SMARA Mineral Land Classification. Website: https://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=mlc. Accessed April 2025.

3. **MRZ-3**, lands of undetermined mineral resource potential, and
4. **MRZ-4**, lands of unknown mineral resource potential.

DISCUSSION

a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

No impact. The California Department of Mines and Geology classifies lands along the San Joaquin River Corridor as MRZ-1, MRZ-2, and MRZ-3.[55] The Annexation Property is located approximately 3.25 miles southeast of the San Joaquin River area, and, therefore, is not located in or near a designated MRZ. Therefore, the proposed Project would have **no impact** on 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?

No impact. The Annexation Property is not located in a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan. As stated above in response to question **a)**, no known mineral resources are located on or in the vicinity of the Annexation Property. Therefore, the proposed Project would have **no impact** relating to the availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan.

[55] Fresno County General Plan Background Report.2000.Figure 7-9 Generalized Mineral Resource Zone Classifications.

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIII. NOISE – Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?		X		
b) Generation of excessive groundborne vibration or groundborne noise levels?		X		
c) For a project located within 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?				X

Environmental Setting

The Annexation Property is located in a predominantly residential area in an unincorporated Fresno County island surrounded by the cities of Fresno and Clovis. Primary existing noise sources in and near the Annexation Property are traffic on Willow and Nees Avenues, a commercial shopping center to the east across Willow Avenue, rural residences to the north, single-family residences to the west, and a church to the south. This section relies in part on the technical analysis contained in Appendix E.[56]

[56] WJV Acoustics. July 2023. Acoustical Analysis, Willow & Nees Commercial Office Development, Fresno California.

DISCUSSION

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 in other applicable local, state, or federal standards?

Potential Impact to Ambient Noise Levels

Less than significant impact with mitigation incorporated. Noise associated with construction of the proposed Development would be temporary and would vary depending on the nature of the activities being performed. Noise generated would primarily be associated with the operation of off-road equipment for on-site construction activities as well as construction vehicle traffic on area roadways. Construction noise typically occurs intermittently and varies depending on the nature or phase of construction (e.g., building construction, paving). Noise generated by construction equipment, including earth movers, material handlers, and portable generators typically operate in cycles of 1 or 2 minutes of full power operation followed by 3 to 4 minutes at lower power settings. Other primary sources of acoustical disturbance would be random incidents, which would last less than one minute (such as dropping large pieces of equipment or the hydraulic movement of machinery lifts). During construction, exterior noise levels could negatively affect sensitive receptors in the vicinity of the construction site.

Construction. Excessive noise at a site from construction equipment or work, including the operation, use or employment of pile drivers, hammers, saws, drills, derricks, hoists, or similar construction equipment or tools is prohibited by FMC Article 1–Fresno Noise Ordinance, Section 10-105 (d)–Excessive Noise Prohibited. However, Section 10-109 (a)–Exceptions, permits construction, repair or remodeling work ***accomplished pursuant to a building, electrical, plumbing, mechanical, or other construction permit issued by the City*** or other governmental agency, or to site preparation and grading, ***provided such work takes place between the hours of 7:00 a.m. and 10:00 p.m. on any day except Sunday***. The proposed Development would comply with FMC Section 10-109(a), and, therefore, be in compliance with City ordinances controlling permitted construction-related noise. However, **Mitigation Measure NOI-1** (below), which incorporates best management practices for construction-related noise abatement, would further reduce temporary construction noise. Therefore, compliance with FMC Section 10-109(a) and **NOI-1** would reduce potential impacts from the construction of the proposed development Project to **less than significant with mitigation incorporated.**

Operation. After construction, tenants of the proposed Development would be required to adhere to all relevant regulations contained in FMC Section 10-105 prohibiting excessive noise, and FMC Section 10-102(b), which prohibits noise from commercial developments from exceeding 65 decibels (dB) between the hours of 7:00 a.m. to 10:00

p.m., and 60 dB from 10:00 p.m. to 7:00 a.m. Therefore, compliance with the Fresno Noise Ordinance would ensure that the proposed Development Project would not exceed ambient noise levels mandated by the City, and potential impacts from the operation of the proposed Development would be **less than significant.**

Existing Noise Environment Potential Impacts on the Proposed Project.

Less than significant impact. The Development site is located along the west side of North Willow Avenue, approximately 600 feet south of East Nees Avenue, in Fresno County, California. The Project site is exposed to traffic noise from North Willow and East Nees Avenues. The distance from the closest proposed office buildings to the centerline of North Willow Avenue is approximately 165 feet (Building B and Building C–see Appendix E, Figure 1). Noise exposure from traffic on North Willow Avenue was calculated for existing and future (2046) conditions using the Federal Highway Administration (FHWA) Highway Traffic Noise Model and traffic data obtained from the Fresno Council of Governments (COG) and Caltrans, and the findings of on-site noise level measurements. Noise exposure was calculated in terms of both the Community Noise Equivalent Level (CNEL) noise metric (City of Fresno General Plan noise standards) and hourly worst-case (peak hour) energy average interior noise levels in terms of the Leq metric (City of Fresno Municipal Code noise standards).[57]

Noise level measurements and concurrent traffic counts were conducted on site on October 18, 2022. The purpose of the measurement was to evaluate the accuracy of the FHWA Model in describing traffic noise exposure within the Development site. The measurement site was located within the Development site at a distance of approximately 150 feet from the centerline of North Willow Avenue. The posted speed limit in the Development vicinity was 50 mph (miles per hour). The Development vicinity and noise monitoring site location are provided in Appendix E, Figure 2.

Traffic noise levels predicted by the FHWA Model were 4.5 dB higher than those measured for the conditions observed at the time of the noise measurements for North Willow Avenue. This overprediction of the model is the result of actual traffic speeds in the Project vicinity being well below the posted 50 mph speed limit. Many of the vehicles counted were exiting the retail center opposite the Project site and speeds were relatively low as they entered onto North Willow Avenue. Additionally, the signalized intersection on North Willow Avenue and East Nees Avenue regulates traffic speed in the Project vicinity, as vehicles were often observed to be traveling at speeds well below the posted 50 mph speed limit as they approached a red light at the intersection or were departing the intersection. An adjustment to modeled noise levels, based upon this overprediction of the model is therefore warranted. A conservative offset of -3 dB was applied to Project site noise exposure calculations.

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[57] Ibid. Page 5.

Using data from the FHWA Model and the above-described -3 dB offset, peak hour traffic noise exposure was calculated to be approximately 61 dB Leq (peak hour traffic) at the closest proposed building setback to North Willow Avenue.

The City of Fresno noise level standard applicable for office land uses is an interior noise level of 45 dB Leq, based upon peak hour noise exposure. Worst-case exterior noise levels were calculated to be approximately 61 dB Leq (peak hour traffic). This means that the proposed Development's building construction must be capable of providing a minimum outdoor-to-indoor noise level reduction (NLR) of approximately 16 dB (61-45=16).

It may be assumed that commercial construction methods complying with current building code requirements will reduce exterior noise levels by approximately 25 dB (or more) if windows and doors are closed.[58] This will be sufficient for compliance with the City's interior noise level standards within all rooms and all buildings. Therefore, the proposed Project would have a **less than significant impact,** and would not expose sensitive receptors in the medical building to noise levels that would exceed the City's interior noise level standards. Overall, compliance with FMC Section 10-109(a) and **NOI-1**, and compliance with FMC Section 10-105 and FMC Section 10-102(b) potential impacts from the construction and operation of the proposed Development would be **less than significant with mitigation incorporated.**

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

Less than significant impact with mitigation incorporated. Short-term construction-related activities at the Development site would have the potential to result in varying degrees of temporary groundborne vibration, depending on the specific construction equipment used and the activities involved. Once operational, the Development would not be a likely source of groundborne vibration, because the Development proposed is for office and medical use buildings which do not commonly generate groundborne vibration. FMC Section 15-2507 states: "No vibration shall be produced that is transmitted through the ground and is discernible without the aid of instruments by a reasonable person at the lot lines of the site. Vibrations from temporary construction, demolition, and vehicles that enter and leave the subject parcel (e.g., **construction equipment**, trains, **trucks**, etc.) are exempt from this standard." Vibration during construction at the Development site would be short-term and exempt from municipal noise standards because construction would occur only between the hours of 7:00 a.m. and 10:00 p.m. on any day except Sunday, and, with the implementation of **Mitigation Measure NOI–2**,

[58] Ibid. Page 7.

which would prohibit the use of heavy construction equipment within 25 feet of existing structures, the proposed Development would have a less than significant impact . Also, excessive vibration post construction would be unlikely because residents and tenants would be required to comply with existing noise regulations. Therefore, operation and construction of the proposed Project would have a **less than significant impact with mitigation incorporated** on the generation of excessive groundborne vibration or groundborne noise levels.

c) 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 expose people residing or working in the project area to excessive noise levels?

No impact. The closest airport in the vicinity of the proposed Project is the Fresno Yosemite International Airport, located approximately 4.65 miles south of the Project site. Therefore, because the Project site is located more than two miles from the closest airport, and is not located in an airport influence area, or airport safety zone, the proposed Project would not expose people residing or working in the Project site to excessive noise levels and there would be **no impact**.

Mitigation Measures

MM NOI-1: The following best management practices shall be incorporated during Development construction.

1. Noise and groundborne vibration construction activities whose specific location on the Development site may be flexible (e.g., operation of compressors and generators, cement mixing, general truck idling) shall be conducted as far as possible from the nearest off-site land uses.
2. When possible, construction activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels.
3. Flexible sound control curtains shall be placed around all drilling apparatuses, drill rigs, and jackhammers when in use.
4. The Development contractor shall use power construction equipment with state-of-the-art noise shielding and muffling devices.
5. Barriers such as flexible sound control curtains shall be erected around heavy equipment to minimize the amount of noise on the surrounding land uses to the maximum extent feasible during construction.
6. All construction truck traffic shall be restricted to truck routes approved by the City, which shall avoid residential areas and other sensitive receptors to the extent feasible.
7. A construction notice shall be prepared and shall include the following information: job site address, permit number, name and phone number of the contractor and owner or

owner's agent, hours of construction allowed by code or any discretionary approval for the site, and City telephone numbers where violations can be reported. The notice shall be posted and maintained at the construction site prior to the start of construction and displayed in a location that is readily visible to the public and approved by the City.

MM NOI-2: Construction Vibration. The use of heavy construction equipment within 25 feet of existing structures shall be prohibited.

The proposed Development shall implement and incorporate the noise related mitigation measures as identified in the attached Project Specific Mitigation Monitoring Checklist dated April 23, 2025.

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIV. POPULATION AND HOUSING – Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?			X	
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?			X	

Environmental Setting

The City of Fresno was incorporated in 1885, and had a population of 10,000 by 1890. According to 2020 census data, Fresno was the fifth largest city in the state of California with a population of 542,107.

The City's General Plan Planning Area is the geographic area for which the approved General Plan establishes policies about future growth. The planning area established by the City includes all areas within the City's current city limits, the areas within the current SOI, and an area north of the City's most northeasterly portion of the City (referred to as the North Area). The City's SOI comprises all land within the City Limits, as well as County Islands, which are unincorporated land entirely surrounded by the City, such as the proposed Annexation Property.

DISCUSSION

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

Less than significant impact. The proposed Annexation Property site is currently within the City's SOI in a County Island. Additionally, its land use is identified on the Fresno

General Plan Land Use Map as Commercial Community, and is pre-zoned Commercial Community to be consistent with the General Plan, if the annexation is approved.

The proposed Project would not induce substantial unplanned population growth, either directly or indirectly. The proposed Project consists of the annexation of a 10.55-acre site, and development of 34,100 square feet of medical, dental, and professional office space on a ±3.3-acre portion of the annexation area. The Project does not include any new residential uses and therefore would not directly result in population growth.

While the Project includes the extension of urban services and infrastructure—such as wastewater, water, and storm drainage systems—these improvements are intended to serve only the proposed Development. This infrastructure extension is consistent with the City of Fresno's long-term infrastructure planning and is not expected to facilitate growth beyond what has already been planned for.

The subject site is located within the City of Fresno's Sphere of Influence (SOI) and is designated for Community Commercial use in the Fresno General Plan (2014), Land Use Element. The proposed Development aligns with the land use vision and density projections set forth in that plan. Further, the Fresno General Plan projects long-term population and employment growth in northeast Fresno and supports infill and contiguous development within the SOI (General Plan Policy LU-1-a, LU-1-b).

Additionally, the City of Fresno Public Utilities Department Master Plans—including the Storm Drainage and Flood Control Master Plan (SDFCMP) and the Wastewater Collection System Master Plan—account for the buildout of land uses consistent with the General Plan. The Project area is also within areas studied in the Fresno Council of Governments (Fresno COG) 2022 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), which incorporates the City's General Plan land use forecasts and infrastructure assumptions.

As such, both the direct and indirect effects of the Project on population growth have been anticipated in regional planning documents and are considered planned growth, not substantial unplanned growth.

Therefore, because the Project is consistent with adopted land use and infrastructure plans, it would have a **less than significant impact** on substantial unplanned population growth in an area, either directly or indirectly.

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

Less than significant impact.

The proposed Project would not displace substantial numbers of existing people or housing, nor would it necessitate the construction of replacement housing elsewhere.
The Development site consists of ±3.3 acres at 7819 and 7835 North Willow Avenue, currently designated for agricultural use by Fresno County and proposed for Community Commercial (CC) zoning upon annexation into the City of Fresno. The development proposes the construction of three commercial buildings for medical/dental and professional office use.

As noted in the project description, two single-family residences previously located on the development site were removed between 2020 and 2022. No demolition or displacement of existing residences is proposed as part of the current application. The remaining three single-family residences located within the larger ±10.55-acre annexation area are not part of the proposed development footprint, and would retain their residential uses following annexation. Their inclusion in the annexation boundary is administrative, intended to avoid creation of a county island, and does not reflect a proposal to redevelop those sites.

The City of Fresno's General Plan encourages infill and mixed-use development in areas already designated for urban growth, and the General Plan supports a jobs-housing balance that directs residential growth into planned locations without the need for replacement housing outside of established urban boundaries (General Plan Policies LU-1-a and UF-1-a). This project does not conflict with those goals, nor does it remove housing in a manner that would trigger the need for additional units elsewhere.

Additionally, the Fresno COG 2022 Regional Transportation Plan / Sustainable Communities Strategy (RTP/SCS) includes population and housing forecasts that are consistent with City land use designations and regional housing needs allocation (RHNA) planning. The minimal residential displacement that occurred prior to Project initiation has already been absorbed in regional population estimates and has no material effect on the region's housing stock or housing market dynamics.

Therefore, because the proposed Project would not displace substantial numbers of people or housing necessitating the construction of replacement housing elsewhere, the proposed Project would have a **less than significant impact.**

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XV. PUBLIC SERVICES – Would the project:				
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
Fire protection?			X	
Police protection?			X	
Schools?			X	
Parks?			X	
Other public facilities?			X	

Environmental Setting

Fire Protection: The Fresno Fire Department operates 20 fire stations within the City of Fresno. The closest fire station is the City of Fresno Fire Station #13 located at 815 E Nees Avenue, approximately 2.15 miles west of the Project site.[59]

Police Protection: The City of Fresno operates 6 police stations within the City. The closest police department is located at 1450 East Teague Avenue, approximately 1.6 miles northwest of the Project site.

[59] City of Fresno Fire Department, 2023.Fire Department Station Locations. Website: https://www.fresno.gov/fire/station-locations/. Accessed April 2025.

Schools: The City of Fresno is served by many Unified School Districts. The Project site is located in the Clovis Unified School District. The closest school to the Project site is Garfield Elementary School, located approximately 0.57 miles east of the Project site.

Parks: There are more than 80 public parks owned and operated by the City of Fresno. The closest local park is Bob Belcher Neighborhood Park, located approximately 0.73 miles southwest of the Project site.[60]

Other public facilities: Numerous public services are located in the City of Fresno, including courts, libraries, hospitals, and public utilities facilities.[61] The closest library is the Politi Branch Library, located at 5771 N. First Street, approximately 3 miles southwest of the proposed Project. The closest hospital is the Saint Agnes Medical Center, located at 1303 E. Herndon Avenue, about 2.2 miles southwest of the proposed Project. The closest public utilities facility is the Water Division Operations Center, located at 1910 E. University Avenue, approximately 6.5 miles southwest of the proposed Project site.

DISCUSSION

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:

i. Fire protection?

Less than significant impact. The City of Fresno Fire Department will provide fire protection service to the Project site, and the Development will be required to comply with all Fire Department requirements related to design, access, and prevention systems. The City of Fresno Fire Department reviewed this Project and did not have any comments. The City of Fresno Fire Station #13 is the closest fire station, approximately 2.15 miles west of the Project site located at 815 East Nees Avenue. The Annexation and Development will increase the demand for fire protection services near the Project site. However, the Project is consistent with the General Plan land use and pre-zoning planned for within the City's General Plan Planning Area to ensure that public services, including

[60] City of Fresno Parks and Recreation Department. Parks Locator. Website: https://cityoffresno.maps.arcgis.com/apps/webappviewer/index.html?id=53f212b20a0f47efb6681df6c8ad2eaa. Accessed April 2025.

[61] City of Fresno. 2023. GIS Data Viewing Application. Website: https://cityoffresno.maps.arcgis.com/apps/webappviewer/index.html?id=dbd9813b2fa74382b3096b9613e7470d. Accessed April 2025.

fire protection, can accommodate the growth and would not be adversely affect fire protection services. In addition, the proposed Development will be required to pay a Fire Facilities Fee and a Development Impact Fee pursuant to Chapter 12, Article 4.9 of the City's Code of Ordinances to account for the potential impacts to fire services. Therefore, construction and operation of the proposed Project would have a **less than significant impact** on the provision of fire protection services and would not require the alteration of construction of government facilities to maintain current service levels.

b) Police protection?

Less than significant impact. The Project is currently located in unincorporated Fresno County and is undergoing annexation into the City of Fresno—the Fresno County Sheriff's Office is presently responsible for providing law enforcement services to this area. Once the annexation process is finalized and the area becomes part of the City of Fresno, jurisdiction for police services will transition to the Fresno Police Department. The City of Fresno Police Department was provided with the opportunity to review this Project and did not have any comments. The closest police department is located approximately 1.6 miles northeast of the Project site at 1450 Teague Avenue. The proposed Development would increase the demand for police services near the Project site. However, the Project is consistent with the General Plan land use and pre-zoning planned for within the City's General Plan Planning Area to ensure that public services, including police services, can accommodate the growth and will not be adversely affected.

The proposed Development could result in an incremental increase in the demand for police protection services. However, the proposed Development would be required to pay a Police Impact Fee and a Development Impact Fee pursuant to Chapter 12. Article 4.8 of the City's Code of Ordinances to account for the potential impacts to police protection services. Therefore, the proposed Project would not result in a substantial adverse impact associated with the provision of additional police facilities or services, and impacts to police protection would represent a **less than significant impact.**

c) Schools?

Less Than Significant Impact. The Project site is within the Clovis Unified School District. The Clovis Unified School District was provided with the opportunity to review this Project and did not have any comments. The proposed Development, by the possible addition of employees to the region, could increase the demand for school services. In accordance with California Education Code Section 17620 and California Government Code Section 65995, school districts are authorized to collect fees on new residential and commercial/industrial development for the purpose of constructing or reconstructing school facilities. The State of California requests that future development pay development impact fees to the school districts when a building permit is received. School

districts use impact fees to maintain and develop school facilities as needed, and the developer will be required to pay appropriate fees pursuant to California Education Code §17620 to address potential impacts to schools. Therefore, the payment of development impact fees would ensure the proposed Project would have a **less than significant impact** on schools.

d) Parks?

Less than significant. The proposed annexation Project includes three properties with existing single family homes that are not proposed for new development, and are included in the scope of the annexation in order to not leave a remainder portion of the County island. Existing single-family homes that are not being modified, expanded, or redeveloped typically represent existing (baseline) conditions and would not be considered new potential impacts**.** Therefore, the existing single-family homes would not represent potential impacts on parks.

The proposed Development, by the potential addition of new employees to the area, could increase demand for park services in the region. However, impacts on parks and recreational facilities are generally determined by analyzing the projected increase in demand for these facilities as a result of future residential development and the corresponding population increase projected under a proposed Project. The proposed Development, as a commercial development, would therefore be expected to have a **less than significant impact** on recreational facilities. In addition, the proposed Development would contribute its fair share to parks facilities through development impact fees required under FMC Chapter 12, Article 4.7–Park Facilities Fee. Park facilities fees are needed in order to finance these public facilities and to pay for each development's fair share of the construction and acquisition costs of these improvements. Therefore, payment of the Park Facility Fee would ensure the proposed Development—and the proposed Project—would have a **less than significant impact** on parks.

e) Other public facilities?

Less than significant impact. The proposed Development, by addition of new employees to the area, could increase the use of public facilities, such as hospitals, libraries, and courthouses. However, the proposed Development would be required to pay development impact fees for the potential increase in demand for public facilities. The proposed development project has been reviewed by the Department of Public Utilities to ensure the additional services can be accommodated, to provide conditions for connections to City services, and to assess relevant service fees. Therefore, payment of development impact fees the proposed Development would ensure that the Project would

have a **less than significant impact** on the City's ability to provide services in other public facilities.

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVI. RECREATION - Would the project:				
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?			X	
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?				X

Environmental Setting

The Fresno General Plan establishes long-term goals and policies for future development of the parks and recreation system. To meet the recreation needs of the community, the City provides numerous different park types including pocket parks, neighborhood parks, community parks, regional parks, special use parks, greenbelts/trails, and open space/natural areas.

There are more than 80 public parks owned and operated by the City. The closest local park is Bob Belcher Neighborhood Park, located approximately 0.73 miles southwest of the Project site.[62]

DISCUSSION

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

[62] City of Fresno Parks and Recreation Department. Parks Locator. Website: https://cityoffresno.maps.arcgis.com/apps/webappviewer/index.html?id=53f212b20a0f47efb6681df6c8ad2eaa. Accessed April 2025.

Less Than Significant Impact. As stated above, the proposed annexation Project includes three properties with existing single family homes that are not proposed for new development, and are included in the scope of the annexation in order to not leave a remainder portion of the County island. Existing single-family homes that are not being modified, expanded, or redeveloped typically represent existing (baseline) conditions and would not be considered new potential impacts**.** Therefore, the existing single-family homes would not represent potential impacts on parks.

Implementation of the proposed Development, by the addition of new employees to the area, could result in the increased use of parks and recreational facilities. However, as new commercial development, the proposed Development would contribute its fair share to parks and recreational facilities through development impact fees required under Section 12-4.705 of Article 4.7–Park Facilities Fee of the FMC. Therefore, the proposed Project would have a **less than significant impact** on existing neighborhood and regional parks or other recreational facilities.

b) Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?

No Impact. The proposed Development's design does not include recreational facilities, and would not, due to an excessive addition on new demand, require the construction or expansion of local or regional recreational facilities. Therefore, the proposed Project would have **no impact** on this environmental issue.

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

Environmental Setting

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

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

CEQA Guidelines Section 15064.3(b)(4) also states that "[a] lead agency has discretion to choose the most appropriate methodology to evaluate a project's vehicle miles traveled, including whether to express the change in absolute terms, per capita, per household or in any other measure. A lead agency may use models to estimate a project's vehicle miles traveled, and may revise those estimates to reflect professional judgment

based on substantial evidence. Any assumptions used to estimate vehicle miles traveled and any revision to model outputs should be documented and explained in the environmental document prepared for the project. The standard of adequacy in Section 15151 shall apply to the analysis described in this section."

The City of Fresno adopted CEQA Guidelines for Vehicle Miles Traveled Thresholds, dated June 25, 2020,[63] pursuant to SB 743 to be effective as of July 1, 2020. The thresholds described therein are referred to herein as the City of Fresno VMT Thresholds. The City of Fresno VMT Thresholds document was prepared and adopted consistent with the requirements of CEQA Guidelines Sections 15064.3 and 15064.7. The December 2018 Technical Advisory on Evaluating Transportation Impacts in CEQA (Technical Advisory) published by the Governor's Office of Planning and Research (OPR) was utilized as a reference and guidance document in the preparation of the City of Fresno VMT Thresholds.

This section is based, in part, on the Trip Generation and VMT analysis prepared for the proposed Development (Appendix F).[64]

DISCUSSION

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

Less than significant impact. The proposed Development would be subject to and be consistent with applicable transportation plans and policies, including the **City of Fresno General Plan Mobility and Transportation Element**, the **Bicycle, Pedestrian, and Trails Master Plan**, and the **Fresno COG 2022 RTP/SCS**. The project would be reviewed for consistency with the **City's Development Code (Title 15)**, including requirements for sidewalks, driveway placement, and multimodal access.

Pursuant to **SB 743**, the project would be screened for Vehicle Miles Traveled (VMT) impacts per the City's adopted thresholds and guidelines exceeding an applicable threshold of significance for VMT would indicate a significant impact that would potentially conflict with a program, plan, ordinance or policy addressing the circulation system such as the plans described above. The City of Fresno VMT Thresholds Section 3.0 regarding Project Screening discusses a variety of projects that may be screened out of a VMT analysis, including specific development and transportation projects. For development projects, conditions may exist that would allow the presumption that a development project will have a less-than-significant impact. These conditions may be size, location,

[63] City of Fresno. June 2020. CEQA Guidelines for Vehicle Miles Traveled Thresholds.

[64].Vehicle Miles Traveled Analysis for the Proposed Medical and Professional Office Buildings 7829 and 7835 North Willow Avenue, Fresno, California.

proximity to transit, or trip-making potential. For transportation projects, the primary attribute to consider with transportation projects is the potential to increase vehicle travel, sometimes referred to as "induced travel."

One threshold is project location in relation to VMT generation per employee in the City. The proposed Development Project is located within an area that is known to generate low VMT per employee, the green area as plotted on Figure 7–Existing VMT per Employee of the City of Fresno VMT Thresholds in Appendix F.[65]

Additionally, the City's Planning & Development Department Development Services Division, requires the applicant, as part of the entitlement process, to complete an Environmental Evaluation Screening Form, which determines if further environmental review is required based on project factors. Section 22–Traffic of this form queries if the project would generate more than 100 peak hour trips in Traffic Impact Zone (TIZ) III. If not, then a Traffic Impact Study is not required. According to the site-specific VMT analysis prepared for the proposed Development in Appendix F, the Development site is located in TIZ III, and would generate 69 AM peak hour trips, and 78 PM peak hour trips, below the 100 peak hour threshold.[66]

Also, the proposed annexation Project includes three properties with existing single-family homes that are not proposed for new development or physical modification. These parcels are included within the annexation boundary to prevent the creation of a remainder County island, not for the purpose of redevelopment. Under CEQA, existing residential uses that are not proposed for expansion, intensification, or demolition are considered part of the baseline physical conditions.[67] As such, these homes do not represent new development and would not introduce new vehicle trips or transportation demands. Consequently, their inclusion would not result in new or increased impacts related to any adopted plan, program, ordinance, or policy addressing the circulation system, including those related to transit, roadways, bicycle, or pedestrian facilities. Therefore, based on the criteria demonstrated above, the proposed Project does not require further traffic impact analysis, and would have a **less than significant impact** on a program, plan, ordinance, or policy addressing the circulation system.

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

Less than significant impact. SB 743 requires that relevant CEQA analysis of transportation impacts, codified in CEQA Guidelines Section 15064.3(b), be conducted

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[65] Vehicle Miles Traveled Analysis for the Proposed Medical and Professional Office Buildings 7829 and 7835 North Willow Avenue, Fresno, California, p. 3.

[66] Ibid, p. 2.

[67] CEQA Guidelines §15126.2(a).

using a metric known as VMT instead of LOS. VMT measures how much actual auto travel (additional miles driven) a proposed project would create on California roads. If the project adds excessive car travel onto our roads, the project may cause a significant transportation impact.

As stated above, the proposed annexation Project includes three properties with existing single-family homes that are not proposed for new development or physical modification, and are included within the annexation boundary to prevent the creation of a remainder County island, not for the purpose of redevelopment. These existing residential uses are not proposed for expansion, intensification, or demolition—they are considered part of the baseline physical conditions. As such, these homes do not represent new development and would not introduce new vehicle trips or transportation demands. Therefore, they would not conflict with or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b).

For the reasons stated above in response to question **a)**, a VMT analysis for the proposed Development was prepared that demonstrated that no further traffic impact analysis was required. Therefore, the proposed Project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3(b), and **a less than significant impact** would occur as a result of the proposed Project.

c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Less than significant impact. Geometric designs that would result in vehicular and/or pedestrian safety hazards would be sharp curves or dangerous intersections. Incompatible uses for a commercial development would include industries such as agricultural operations where soil tilling and/or pesticide use creates air pollution, or logistic distribution centers that have large tractors, semi-trailer trucks, and oversized equipment consistently traveling the local roadways that may create a hazard to cars or pedestrians; or hazardous industrial uses.

The Development would result in both on-site and off-site infrastructure improvements including new utilities, landscaping, sidewalks, curb, gutters, and lighting. However, all Development improvements would be subject to applicable design guidelines enforced during design review and contained in the FMC and relevant state building codes. Consequently, the proposed Development design and buildout would not include known or intentional hazardous traffic design features. No changes to use or geometric design of the existing single-family residences to be annexed is anticipated at this time. Any future changes which occur with respect to the portion of the Annexation Property which is not being developed at this time will be analyzed when those changes are proposed.

Therefore, the proposed Project would have a **less than significant impact** on hazards created by design or incompatibility with adjacent land uses.

d) Result in inadequate emergency access?

Less than significant impact. The proposed Development would not result in inadequate emergency access during construction or operation. Site access and circulation would be designed to accommodate emergency ingress and egress by fire trucks, police units, and ambulance/paramedic vehicles. All Development access features are subject to and must satisfy City of Fresno Fire Department design requirements. No physical changes are being proposed for the existing single-family residences to be annexed, and therefore adequate emergency access will be maintained. Any future changes which occur with respect to the portion of the Annexation Property which is not being developed at this time will be analyzed when those changes are proposed. Therefore, compliance with applicable laws and policies would ensure that a **less than significant impact** would occur to emergency access as a result of the proposed Project.

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVII. TRIBAL CULTURAL RESOURCES – Would the project:				
a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in PRC section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in PRC section 5020.1(k), or,		X		
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of PRC section 5024.1. In applying the criteria set forth in subdivision (c) of PRC section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.		X		

Environmental Setting

Cultural resources include prehistoric-era archaeological sites, historic-era archaeological sites, **Native American traditional cultural properties**, sites of religious and cultural significance, and historical buildings, structures, objects, and sites.

Section 21074 of the PRC defines Tribal Cultural Resources as:

(a) “Tribal cultural resources” are either of the following:

(1) Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:

(A) Included or determined to be eligible for inclusion in the California Register of Historical Resources.

(B) Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.

(2) 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 Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.

(b) A cultural landscape that meets the criteria of subdivision (a) is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape.

(c) A historical resource described in Section 21084.1, a unique archaeological resource as defined in subdivision(g) of Section 21083.2, or a “nonunique archaeological resource” as defined in subdivision (h) of Section 21083.2 may also be a tribal cultural resource if it conforms with the criteria of subdivision (a).

Assembly Bill 52 (AB 52) requires meaningful consultation with California Native American tribes on potential impacts to Tribal Cultural Resources, as defined in PRC §21074. AB 52 applies to all development projects that have a notice of preparation (NOP) or a notice of negative declaration or mitigated negative declaration filed on or after July 1, 2015. As part of the AB 52 consultation processes required by State law, notification of the proposed development Project has been sent to Native American tribes with possible traditional or cultural affiliation to the area. Currently, the Table Mountain Rancheria Tribe and the Dumna Wo Wah Tribe have requested to be notified pursuant to Assembly Bill (AB) 52. A certified letter was mailed to the above mentioned tribes on ***May 3, 2024.*** The 30-day comment period ended on ***June 3, 2024.*** Neither tribe requested consultation.

The 10.55-acre Annexation Property, including the 3.3-acre Development site, is located in the Central Valley region of California in the northeastern periphery of the City of Fresno. The Sierra Nevada mountain range is located approximately 35 miles east of the

Project site, and the San Joaquin River is located approximately 3.7 miles northwest of the Project site. The Development site is located at 7819 and 7835 North Willow Avenue in an unincorporated area of Fresno County near the cities of Fresno and Clovis. The Development site is surrounded by the cities of Fresno and Clovis, with rural residences to the north, single-family residences to the west, a church to the south, and commercial buildings to the east. The Project site lies within Section 36 of Township 12 South, Range 20 East, as shown on the Clovis, California USGS topographic quadrangle.

The API is defined as the entirety of the Development site, which includes all proposed construction activities and access roads (see Appendix C, Attachment A, Figure 2). The API consists of a vacant lot, populated by grasses and weeds. Given the previous disturbances within the Development site from the original construction of the two single-family residences and their associated structures and landscaping and the subsequent demolition of those structures and landscaping elements, there is no native ground surface remaining with the Development site.

This section relies on the technical analyses contained in the Cultural Resource Assessment of the Project site (Appendix C) prepared by Bargas in March 2023.[68]

DISCUSSION

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

i. 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

Less than significant with mitigation incorporated. The CEQA process for identifying potential impacts to cultural resources includes: (a) the identification of cultural resources within a proposed project area; (b) an evaluation of whether the identified resources qualify as historical resources; (c) an assessment to determine whether a project may have a significant impact on historical resources, **including tribal cultural resources as defined by PRC Section 21074**; and finally (d) the development of avoidance/preservation measures or mitigation measures that would preferably avoid impacts or reduce potential impacts to a level that is less than significant.

[68] Bargas Environmental Consulting, LLC. March 2023. Cultural Resources Assessment Summary Letter Report for the Willow Nees Commercial Project in Unincorporated Fresno County, California.

Bargas conducted a cultural resources assessment for the proposed Development which included a records search conducted at the SSJVIC at California State University, Bakersfield, review of properties listed on the NRHP and the CRHR, a review of historic maps and aerial photographs/imagery, and a search of the NAHC's SLF. The records search was conducted by staff at the SSJVIC on September 12, 2022. This search included the API and a 0.5-mile radius (see Appendix C, Attachment A, Figure 3) and reviewed previously conducted studies and previously identified cultural resources located within the API and the surrounding area.

The results of the records search and review indicated that no previously recorded cultural resources, including **tribal cultural resources**, were identified within or overlapping the API. However, an agricultural ditch ("Maupin Ditch"), likely no longer extant, once overlapped the API. Although the structures and associated features once located within the API have been demolished, there may be associated subsurface historic-age features or deposits that remain.

The NAHC maintains the confidential SLF, which contains information on sites of traditional, cultural, or religious value to the Native American community. A search of the SLF was requested from the NAHC on August 31, 2021 (Appendix C, Attachment B). Bargas received a response from the NAHC on October 28, 2022, stating the SLF search was negative. However, the NAHC noted that while the results are negative this does not guarantee the absence of cultural resources within the development Project API. The NAHC identified Native American tribes and representatives that may have knowledge of cultural resources within the area. Correspondence between Bargas and the NAHC is provided in Appendix C, Attachment B).

Given this potential for cultural resources to exist within the API, Bargas recommends the implementation of **Mitigation Measure CUL 1** which requires that a qualified archaeologist conduct cultural resources sensitivity training to the construction crew prior to the onset of development Project-related ground-disturbing activities. In addition, although intact subsurface archaeological deposits are not expected to occur, the proposed development Project would comply with **Mitigation Measures CUL-2** and **CUL-3,** and **CUL-4** (below) in order to avoid inadvertent impacts to unknown resources, including **tribal cultural resources**. Implementation of **Mitigation Measures CUL 1, CUL-2**, **CUL-3,** and **CUL-4** would reduce potential impacts to unknown cultural resources to **less than significant with mitigation incorporated.**

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

Less than significant impact with mitigation incorporated. Based on the results of the AB 52 consultation and Bargas' archaeological assessment, no historic resources were identified that could be determined significant pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1. No tribes requested consultation or identified any resources.

Although intact subsurface archaeological deposits are not expected to occur, the Project will comply with mitigation measures **CUL 1, CUL-2, CUL-3,** and **CUL-4** (below) to avoid inadvertent impacts to unknown resources.

With implementation of **Mitigation Measures CUL-1, CUL-2, CUL-3** and **CUL-4,** the proposed Project would have a **less than significant impact with mitigation incorporated** to historical resources, including Tribal Cultural Resources, from the proposed Project under CEQA.

Mitigation Measures

MM CUL-1: A qualified archaeologist shall conduct cultural resources sensitivity training to the construction crew prior to the onset of development Project-related ground-disturbing activities. While on-site for the cultural resources sensitivity training, the archaeologist shall also investigate whether any trace of the historic-age Maupin Ditch remain within the API and if so, formally document this resource on the applicable Department of Parks and Recreation (DPR) 523 series forms and assess its significance and eligibility for listing in the CRHR.

MM CUL-2: If previously unknown resources are encountered before or during grading activities, construction shall stop in the immediate vicinity of the find and a qualified historical resources specialist shall be consulted to determine whether the resource requires further study. The qualified historical resources specialist shall make recommendations to the City on the measures that shall be implemented to protect the discovered resources, including but not limited to excavation of the finds and evaluation of the finds in accordance with Section 15064.5 of the CEQA Guidelines and the City's Historic Preservation Ordinance.

If the resources are determined to be unique historical resources as defined under Section 15064.5 of the CEQA Guidelines, measures shall be identified by the monitor and recommended to the Lead Agency. Appropriate measures for significant resources could include avoidance or capping, incorporation of the site in green space, parks, or open space, or data recovery excavations of the finds.

No further grading shall occur in the area of the discovery until the Lead Agency approves the measures to protect these resources. Any historical artifacts recovered as a result of

mitigation shall be provided to a City-approved institution or person who is capable of providing long-term preservation to allow future scientific study.

MM CUL-3: Subsequent to a preliminary City review of the project grading plans, if there is evidence that a project will include excavation or construction activities within previously undisturbed soils, a field survey and literature search for prehistoric archaeological resources shall be conducted. The following procedures shall be followed.

If prehistoric resources are not found during either the field survey or literature search, excavation and/or construction activities can commence. In the event that buried prehistoric archaeological resources are discovered during excavation and/or construction activities, construction shall stop in the immediate vicinity of the find and a qualified archaeologist shall be consulted to determine whether the resource requires further study. The qualified archaeologist shall make recommendations to the City on the measures that shall be implemented to protect the discovered resources, including but not limited to excavation of the finds and evaluation of the finds in accordance with Section 15064.5 of the CEQA Guidelines. If the resources are determined to be unique prehistoric archaeological resources as defined under Section 15064.5 of the CEQA Guidelines, mitigation measures shall be identified by the monitor and recommended to the Lead Agency. Appropriate measures for significant resources could include avoidance or capping, incorporation of the site in green space, parks, or open space, or data recovery excavations of the finds. No further grading shall occur in the area of the discovery until the Lead Agency approves the measures to protect these resources. Any prehistoric archaeological artifacts recovered as a result of mitigation shall be provided to a City-approved institution or person who is capable of providing long-term preservation to allow future scientific study.

If prehistoric resources are found during the field survey or literature review, the resources shall be inventoried using appropriate State record forms and submit the forms to the Southern San Joaquin Valley Information Center. The resources shall be evaluated for significance. If the resources are found to be significant, measures shall be identified by the qualified archaeologist. Similar to above, appropriate mitigation measures for significant resources could include avoidance or capping, incorporation of the site in green space, parks, or open space, or data recovery excavations of the finds. In addition, appropriate mitigation for excavation and construction activities in the vicinity of the resources found during the field survey or literature review shall include an archaeological monitor. The monitoring period shall be determined by the qualified archaeologist. If additional prehistoric archaeological resources are found during excavation and/or construction activities, the procedure identified above for the discovery of unknown resources shall be followed.

MM CUL-4: In the event that human remains are unearthed during excavation and grading activities of any future development project, all activity shall cease immediately.

Pursuant to Health and Safety Code (HSC) Section 7050.5, no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98(a). If the remains are determined to be of Native American descent, the coroner shall within 24 hours notify the Native American Heritage Commission (NAHC). The NAHC shall then contact the most likely descendent of the deceased Native American, who shall then serve as the consultant on how to proceed with the remains. Pursuant to PRC Section 5097.98(b), upon the discovery of Native American remains, the landowner shall ensure that the immediate vicinity, according to generally accepted cultural or archaeological standards or practices, where the Native American human remains are located is not damaged or disturbed by further development activity until the landowner has discussed and conferred with the most likely descendants regarding their recommendations, if applicable, taking into account the possibility of multiple human remains. The landowner shall discuss and confer with the descendants all reasonable options regarding the descendants' preferences for treatment.

The proposed Project shall implement and incorporate the cultural resources related mitigation measures as identified in the attached Project Specific Mitigation Monitoring Checklist dated April 23, 2025.

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIX. UTILITIES AND SERVICE SYSTEMS – 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 effect?			X	
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?			X	
c) Result in a determination by the waste water treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?			X	
d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?			X	
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?			X	

Environmental Setting

The City of Fresno DPU provides water, wastewater, and solid waste management services to the Fresno General Plan Planning Area.

The DPU Water Division manages and operates the City's water system, delivering drinking water to about 500,000 urban residential, commercial, and industrial customers in over 114 square miles of the City and many county islands within the City's SOI.[69] The DPU Wastewater Management Division (WMD) maintains the majority of the wastewater collection systems that convey wastewater to the Fresno/Clovis Regional Wastewater Reclamation Facility (RWRF), and all of the wastewater collection system that conveys wastewater to the North Fresno Water Reclamation Facility (NFWRF).

The FMFCD provides stormwater collection and disposal and flood control for the City of Fresno, the City of Clovis, and the unincorporated areas within the City's SOI. The FMFCD is a special district created by the State of California Legislature and ratified by the voters of the district in 1956.[70]

Pacific Gas & Electric (PG&E) is the only provider of natural gas and electricity in the City, and AT&T is the largest provider of cellular and fixed telephone services in the Planning Area.

DISCUSSION

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?

Less than significant impact. The proposed Development would develop an approximately 3.3-acre, single-story medical and professional office facilities consisting of two 11,160 square-foot buildings and one 11,780 square-foot building, on-site parking for 166 standard and ADA parking stalls, landscaping, and associated site improvements. Access to the site would consist of two vehicle driveways to the east along North Willow Avenue, and two vehicle driveways to the south along the unnamed existing alleyway.

The proposed Development Project would require the construction of new infrastructure to connect to the existing utility infrastructure. This would include water, wastewater, and stormwater drainage connections. Additionally, the Development would include connections for electric power, and telecommunications facilities. However, the

[69] City of Fresno. Public Utilities website. https://www.fresno.gov/publicutilities/. AccessedApril 2025.

[70] Fresno County. 2024. Annex M: Fresno Metropolitan Flood Control District. Page 5.

installation of this infrastructure would not likely result in the immediate necessity to relocate or construct new water, wastewater treatment, storm water drainage, electric power, natural gas, or telecommunications facilities. The proposed Development, through the City's entitlement and building permit process, would comply with General Plan policies and Municipal Code ordinances designed to prohibit or reduce environmental impacts to the City's utility service systems, specifically through connection fees and payment for municipal utility services.

The proposed annexation Project includes three properties with existing single-family homes that are not proposed for new development or physical modification. These parcels are included within the annexation boundary to prevent the creation of a remainder County island, not for the purpose of redevelopment. These existing residential uses that are not proposed for expansion, intensification, or demolition are considered part of the baseline physical conditions. As such, these homes do not represent new development that would 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. Therefore, the proposed Project would have a **less than significant impact** on existing utilities and service systems**,** and would not 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.

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

Less than significant impact. The City relies on groundwater from the North Kings Subbasin; surface water from CVP through a contract with the USBR; Kings River water through a contract with FID; and recycled water.[71]

The City of Fresno 2020 Urban Water Management Plan indicates that: (1) from the year 2025 to 2045, the City is projected to have greater than 100,000 Acre Feet (AF) of available supply after meeting demands in normal years; (2) the City is able to meet all water demands in a single dry year; and (3) the City is projected to meet all demands during a five-year drought with its existing supplies.[72]

The Development would connect to the municipal water system provided by City of Fresno DPU, and would represent anticipated future development in accordance with the General Plan and Zoning Ordinance upon which, in part, water demand projections are based. In addition, the proposed Development implements mandated energy efficient design and water efficiency and conservation regulations in accordance with CALGreen

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[71] City of Fresno Department of Public Utilities. July 2021. 2020 Urban Water Management Plan, p. ES-5.

[72] Ibid. Section 7.1.4—Water Service Reliability, p. 7-5.

building standards. Two of the three existing single family homes are already connected to city water with the third home using a private well.

Therefore, the proposed Project would have a **less than significant impact** on the City's available water supplies.

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

Less than significant impact.
The City acts as the Regional Sewer Agency and is responsible for operating the Fresno/Clovis Regional Wastewater Reclamation Facility (RWRF) and the North Fresno Wastewater Treatment Facility (NFWTF). The Regional Facility provides wastewater treatment for a service area that includes most of the Cities of Fresno and Clovis, and some unincorporated areas of Fresno County. The proposed Project is not expected to exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board. The City of Fresno owns and operates two wastewater treatment facilities. The RWRF currently has a capacity of 91.5 million gallons per day (mgd). The NFWTF has a capacity of 0.71 mgd. The Department of Public Utilities has determined that adequate sanitary sewer and water services would be available to serve the proposed Project subject to the payment of any applicable connection charges and/or fees and extension of services in a manner that is compliant with the Department of Public Utilities standards, specifications, and policies. The proposed Project is not expected to exceed the capacity of existing wastewater-related services and facilities.

None of the five parcels are currently connected to the City's sewer system. The two parcels fronting East Nees Avenue can connect to the existing 10-sewer main located in the center of the street. However, to service the proposed development project, an 8-inch sewer main will have to be extended in North Willow Avenue to service the three parcels fronting North Willow Avenue.
Therefore, with the payment of connection and service fees the proposed development Project would have a **less than significant impact** on existing wastewater service or treatment capacity.

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?

Less than significant impact. Landfills in the region include the American Avenue Landfill (10-AA-0009), located approximately 25 miles southwest of the proposed Project, and the Clovis Landfill (City of Clovis Landfill 10-AA-0004), located approximately 8 miles northeast of the proposed Project. The City of Fresno primarily uses the American Avenue

Landfill, although the Clovis Landfill represents a viable alternative site to receive solid waste from the Development.

The 440-acre American Avenue landfill has a maximum permitted capacity of 44,239,000 cubic yards, and, as of June 2020, had a net remaining capacity of 22,656,000 cubic yards, and a maximum permitted daily tonnage of 3,600 tons per day. The landfill has an estimated closure date of October 2044.[73]

The 210-acre Clovis Landfill has a maximum permitted capacity of 10,730,000 cubic yards, and a remaining site capacity of 6,770,000 cubic yards. The landfill has a maximum permitted daily tonnage throughput of 2,000 tons per day, with an average daily incoming waste stream of 220 tons per day. The landfill has an estimated closure date of 2066.[74]Based on CalEEMod modeling, the proposed Development is estimated to generate approximately **184 tons of solid waste per year**,[75] or 0.5 tons per day. Since the American Avenue landfill and the Clovis landfill have a combined permitted maximum daily tonnage capacity of 5,600 tons per day, of which the proposed Development would represent approximately 0.009 percent of regional daily solid waste disposal capacity. As such, the proposed Development would have a **less than significant impact**, and would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals.

The existing single-family homes within the proposed Project are served by the same landfills, although they represent baseline conditions with no plans for physical change. Therefore, existing single-family homes would have no new potential to impact regional landfills.

Therefore, because the proposed Development would not generate solid waste in excess of the capacity of the local landfills, and would comply with General Plan policies and Municipal Code ordinances designed to achieve local, regional, and state waste reduction goals, it would have a **less than significant impact** on state and local standards managing the generation of solid waste.

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

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[73] CalRecycle website. SWIS Facility/Site Search for Landfill 10-AA-0009**.** Application for Solid Waste Facility Permit and Waste Discharge Requirements. https://www2.calrecycle.ca.gov/SolidWaste/Site/Search. Accessed April 2025.

[74] CalRecycle website. SWIS Facility/Site Search for Landfill 10-AA-0004**.** Application for Solid Waste Facility Permit and Waste Discharge Requirements https://www2.calrecycle.ca.gov/SolidWaste/Site/Search. Accessed April 2025.

[75] CalEEMod Model. Version 2022.1.1.29. Section 5.13.2—Waste by Land Use, Mitigated (Appendix G).

Less than significant impact. Construction and operation of the proposed Development will comply with federal, state, and local statutes and regulations governing solid waste generation, transport, disposal, and recycling through the City's entitlement review process and conditions of approval. Specifically, the proposed Development would be controlled by FMC Chapter 6–Municipal Services and Utilities, Article 2–Waste Collection and Disposal, which incorporates State plans and goals and applies them to the solid waste collection gathered from all properties within the City which are serviced by the DPU. Therefore, through compliance with Article 2–Waste Collection and Disposal, the proposed Project would have a **less than significant impact** on compliance with federal, state, and local management and reduction statutes and regulations related to solid waste.

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XX. WILDFIRE – If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?			X	
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?			X	
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?			X	
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?				X

Environmental Setting

In California, fire hazard severity zones are areas designated under California PRC Sections 4201 to 4204. These zones are broken into two categories: State Responsibility Areas (SRAs) and Local Agency Areas. Fire hazards are classified in SRAs as Very High, High, or Moderate. CEQA additionally requires analysis of wildfire risk in Local Agency

Areas classified as Very High Fire Hazard Severity Zones. These are designated pursuant to California Government Code Sections 51175 to 51189.

There are no SRAs within the vicinity of the Project site, and, according to the CAL FIRE Draft Fire Hazard Severity Zone in LRA Map for Fresno County, the Project site is not located in a Fire Hazard Severity Zone. [76]

The City of Fresno is categorized as having little to no threat or moderate fire hazard due to its extensive urban footprint. This is largely attributable to the non-vegetated/built-out nature of the City and Planning Area.[77] The Project site is comprised of relatively flat land within County limits in an area planned for and occupied with urban uses under the City's General Plan.

DISCUSSION

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?

Less than significant impact. The annexation of the 10.55-acre County Island, including the proposed Development site, would not substantially impair access to the existing roadway network. The Development will add safe and convenient vehicular and pedestrian circulation within the Development site and off-site. The Development application was reviewed by the City of Fresno Fire Department to ensure it will not affect emergency response or evacuation and to ensure the project provides adequate access and infrastructure for fire prevention. The Development will comply with all applicable codes and regulations as put forth by the City of Fresno Police Department and Fire Department. Additionally, the proposed Project site is not located in an area characterized by wildland, nor within a fire hazard severity zone. Therefore, the proposed Project would have a **less than significant impact** on 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?

Less than significant impact. The Development site is located on a flat area of vacant land surrounded by urban land uses and is not in an area considered subject to the risk

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[76] California Department of Forestry and Fire Protection (CAL FIRE). 2024. Fire Hazard Severity Zone Viewer. Website: https://experience.arcgis.com/experience/6a9cb66bb1824cd98756812af41292a0. Accessed April 2025.

[77] 2014 General Plan. 9.5–Wildland Fire Hazards.

of wildfire. Additionally, the Annexation Property as a whole is not located in a Fire Hazard Severity Zone, and would convert the vacant Development land to urban use. Therefore, the proposed Project would have a **less than significant impact** on risks associated with 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?

Less than significant impact. The proposed Development would connect to existing utility infrastructure located in the adjacent public rights-of-way, including municipal water, sewer, storm drainage, and electricity. The Project would not require the construction or relocation of regional utility infrastructure or new water sources. All utility extensions would occur within existing or proposed easements and would be sized to serve the project in accordance with City of Fresno standards. Therefore, the Project would not result in the need for new or physically altered utility facilities beyond those typically required for similar development.

In addition, the proposed Annexation Property, including the Development site, is not located in an area characterized by wildland, or subject to risks from wildfires. Therefore, the proposed Project would not exacerbate fire risk due to the installation or maintenance of required associated infrastructure and would have a **less than significant impact** on the environment.

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

No impact. The Project site is not located in an area designated as a Fire Hazard Severity Zone and the lands associated with the Development site are relatively flat. Additionally, the proposed Development site is not located in an area characterized by wildland, nor subject to risks associated with wildfires. The proposed Development would not expose people or structures to significant risks attributed to wildfire, and would not be susceptible to downslope or downstream flooding or landslides as a result of post-fire instability or drainage changes. Therefore, the Project will have **no impact** on this type of risk exposure.

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIX. MANDATORY FINDINGS OF SIGNIFICANCE				
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?		X		
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means 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)?			X	
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?			X	

DISCUSSION

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 an endangered, rare, or threatened species, or eliminate important examples of the major periods of California history or prehistory?

Less than significant impact with mitigation incorporated. The proposed Annexation Property/development Project would be developed in compliance with General Plan policies and objectives, FMC, and all relevant local, state, and federal laws and policies. With mitigation incorporated, the Project would not impact aesthetic resources, air quality, biological resources, paleontological resources, cultural resources, Tribal cultural Resources, or local historical components. The proposed Project would have a less than significant impact on all other environmental areas.

In order to reduce the potential impact to aesthetics, air quality, biological, cultural, geology and soils (paleontological resources), noise, and Tribal Cultural Resources, the proposed Development would implement mitigation measures: **AES-1, AES-23, AES-3, AES-4, RCM AIR-1, BIO-1, BIO-2, CUL 1, CUL-2, CUL-3, CUL-4, GEO-1, NOI-1 and NOI-2**. (see attached **Mitigation Monitoring and Reporting Program)**.

With application of the mitigation measures listed above, the Project would have a **less than significant impact with mitigation incorporated** on the potential to substantially degrade the quality of the environment, significantly affect fish or wildlife habitat or a plant or animal community, or eliminate important examples of the major periods of California history or prehistory.

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

Less than significant. Development of new projects in the City requires the mitigation of land use impacts on a project-by-project basis. Each project is evaluated for consistency with the project site's General Plan land use designation and zoning, adopted General Plan goals, policies, and actions, and other applicable regional land use plans. The proposed Project would be consistent with the General Plan land use and zoning designations, adopted General Plan goals, policies, and actions, and other applicable regional land use plans, such as the SJVAPCD. In addition, the proposed development Project, with mitigation incorporated, would not result in significant impacts in any issue area.

As such, because the Project would be consistent with zoning (upon approval of the annexation), general plan land use designation, and other applicable regional land use

plans, and would not result in significant impacts with mitigation incorporated, it does not present impacts that are cumulatively considerable when considered in conjunction with past, present, and reasonably foreseeable future development in the vicinity. Therefore, the proposed Project would have a **less than significant impact** on potential impacts to cumulative development.

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

Less than significant impact. The proposed Project includes the development of medical, dental, and/or professional office buildings on approximately ±3.3 acres within a ±10.55-acre area proposed for annexation to the City of Fresno. The site is currently located within unincorporated Fresno County and will be pre-zoned for Community Commercial (CC) uses consistent with the City of Fresno General Plan.

The Initial Study has evaluated all potential environmental impacts, including those related to air quality, biological resources, cultural/tribal resources, paleontological resources, noise, traffic, utilities, public services, and exposure to environmental hazards such as flood zones or fire risk. The Project:

- Does not involve the use of unusually hazardous materials;
- Would not result in emissions or discharges at levels that would threaten human health or safety;
- Is located in a suburban transition area, not in proximity to any sensitive industrial or contaminated sites;
- Complies with existing regulations of the City of Fresno, San Joaquin Valley Air Pollution Control District, California Building Code, and California Fire Code;
- Is subject to standard development conditions and review to ensure public safety and emergency access.
- Does not impact existing biological resources, cultural/tribal resources, or paleontological resources.

All identified impacts have been determined to be **less than significant** or would be mitigated through compliance with adopted standards—no direct or indirect effects were identified that would result in a substantial adverse effect on human beings. Therefore, the proposed Project would not result in environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly

The proposed Project shall implement and incorporate the mitigation measures as identified above and in the attached Project Specific Mitigation Monitoring Checklist dated April 23, 2025.

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Project Specific Mitigation Measure Monitoring Program for: Development Permit Application No. P23-00702, Annexation No. P23-00446, and Pre-zone No. P23-00449

This Mitigation Monitoring and Reporting Program (MMRP) was formulated based upon the findings of the Initial Study/Mitigated Negative Declaration (IS/MND) prepared for the proposed Development Permit Application No. P23-00702, Annexation No. P23-00446, and Pre-zone No. P23-00449 Project (project). The MMRP, which is found in Table A of this section, lists mitigation measures recommended in the IS/MND for the proposed project and identifies mitigation monitoring requirements.

This MMRP has been prepared to comply with the requirements of State law (Public Resources Code Section 21081.6). State law requires the adoption of an MMRP when mitigation measures are required to avoid significant impacts. This requirement facilitates implementation of all mitigation measures adopted through the California Environmental Quality Act (CEQA) process. The MMRP is intended to ensure compliance during implementation of the project.

The MMRP is organized in a matrix format. The first column identifies the mitigation measure. The second column, entitled “Timing for Mitigation Measure,” refers to the implementation and schedule of mitigation measures. The third column, entitled “Mitigation Responsibility,” refers to the party responsible for implementing the mitigation measure. The fourth column, entitled “Monitoring/Reporting Agency,” refers to the agency responsible for oversight or ensuring that the mitigation measure is implemented. The fifth column, entitled “Verification,” will be initialed and dated by the individual designated to verify adherence to the project specific mitigation, when the mitigation measure is completed.

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Table A: Mitigation Monitoring and Reporting Program

MITIGATION MEASURE	Timing for Mitigation Measure	Mitigation Responsibility	Monitoring/ Reporting Agency	Verification (Initials and Date)
I. AESTHETICS				
Mitigation Measure AES-1: Lighting systems for street and parking areas shall include shields to direct light to the roadway surfaces and parking areas. Vertical shields on the light fixtures shall also be used to direct light away from adjacent light sensitive land uses such as residences.	Prior to issuance of building permits	Project Applicant	Public Works Department (PW) and Planning and Development	
AES-2: Lighting for Non-Residential Uses. Lighting systems for non- residential uses, not including public facilities, shall provide shields on the light fixtures and orient the lighting system away from adjacent properties. Low intensity light fixtures shall also be used if excessive spillover light onto adjacent properties will occur.	Prior to issuance of building permits	Project Applicant	Planning and Development	
AES-3: Signage Lighting. Lighting systems for freestanding signs shall not exceed 100 foot Lamberts (FT-L) when adjacent to streets which have an average light intensity of less than 2.0 horizontal footcandles and shall not exceed 500 FT-L when adjacent to streets which have an average light intensity of 2.0 horizontal footcandles or greater.	Prior to issuance of building permits	Project Applicant	Planning and Development	
Mitigation Measure AES-4: Materials used on building facades shall be non-reflective.	Prior to issuance of building permits	Project Applicant	Planning and Development	
II. AGRICULTURE AND FORESTRY RESOURCES				
There are no significant impacts to Agriculture and Forestry Resources.				

Table A: Mitigation Monitoring and Reporting Program

MITIGATION MEASURE	Timing for Mitigation Measure	Mitigation Responsibility	Monitoring/ Reporting Agency	Verification (Initials and Date)
III. AIR QUALITY				
Mitigation Measure RCM AIR-1: Consistent with SJVAPCD Regulation VIII (Fugitive PM10 Prohibitions), the following controls are required to be included as specifications for the proposed project and implemented at the construction site: • All disturbed areas, including storage piles, which are not being actively utilized for construction purposes, shall be effectively stabilized of dust emissions using water, chemical stabilizer/suppressant, covered with a tarp or other suitable cover or vegetative ground cover. • All on-site unpaved roads and off-site unpaved access roads shall be effectively stabilized of dust emissions using water or chemical stabilizer/suppressant. • All land clearing, grubbing, scraping, excavation, land leveling, grading, cut and fill, and demolition activities shall be effectively controlled of fugitive dust emissions utilizing application of water or by presoaking. • When materials are transported off-site, all material shall be covered, or effectively wetted to limit visible dust emissions, and at least 6 inches of freeboard space from the top of the container shall be maintained. • All operations shall limit or expeditiously remove the accumulation of mud or dirt from adjacent public streets at the end of each workday. (The use of dry	Prior to issuance of grading permits, during project construction	Construction Contractor	Planning and Development	

Table A: Mitigation Monitoring and Reporting Program

MITIGATION MEASURE	Timing for Mitigation Measure	Mitigation Responsibility	Monitoring/ Reporting Agency	Verification (Initials and Date)
rotary brushes is expressly prohibited except where preceded or accompanied by sufficient wetting to limit the visible dust emissions. Use of blower devices is expressly forbidden). • Following the addition of materials to, or the removal of materials from, the surface of out-door storage piles, said piles shall be effectively stabilized of fugitive dust emission utilizing sufficient water or chemical stabilizer/suppressant.				
IV. BIOLOGICAL RESOURCES				
Mitigation Measure BIO-1: Construction of the proposed project shall avoid, where possible, vegetation communities that provide suitable habitat for a special-status species known to occur within the Planning Area. If construction within potentially suitable habitat must occur, the presence/absence of any special-status plant or wildlife species must be determined prior to construction, to determine if the habitat supports any special-status species. If a special-status species is determined to occupy any portion of a project site, avoidance and minimization measures shall be incorporated into the construction phase of a project to avoid direct or incidental take of a listed species to the greatest extent feasible.	Prior to construction activities	Construction contractor, qualified biologist	Planning and Development	
Mitigation Measure BIO-2: The project should avoid, if possible, construction within the general nesting season of February through August for avian species protected under Fish and Game Code 3500 and the Migratory Bird Treaty Act (MBTA), if it is determined that suitable	Prior to and during construction	Project Applicant and qualified biologist	Planning and Development	

Table A: Mitigation Monitoring and Reporting Program

MITIGATION MEASURE	Timing for Mitigation Measure	Mitigation Responsibility	Monitoring/ Reporting Agency	Verification (Initials and Date)
nesting habitat occurs on a project site. If construction cannot avoid the nesting season, a pre-construction clearance survey shall be conducted by a qualified biologist to determine if any nesting birds or nesting activity is observed on or within 500-feet of a project site. If an active nest is observed during the survey, a biological monitor shall be on site to ensure that no proposed project activities would impact the active nest. A suitable buffer shall be established around the active nest until the nestlings have fledged and the nest is no longer active. Project activities may continue in the vicinity of the nest only at the discretion of the biological monitor. Prior to commencement of grading activities and issuance of any building permits, the Director of the City of Fresno Planning and Development Department, or designee, shall verify that all proposed project grading and construction plans include specific documentation regarding the requirements of the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code Section 3503, that preconstruction surveys have been completed and the results reviewed by staff, and that the appropriate buffers (if needed) are noted on the plans and established in the field.				
V. CULTURAL RESOURCES				
Mitigation Measure CUL 1: A qualified archaeologist shall conduct cultural resources sensitivity training to the construction crew prior to the onset of development Project-related ground-disturbing activities. While on-site for the cultural resources sensitivity training, the	Prior to construction activities	Project Applicant and qualified historical resources	Planning and Development	

Table A: Mitigation Monitoring and Reporting Program

MITIGATION MEASURE	Timing for Mitigation Measure	Mitigation Responsibility	Monitoring/ Reporting Agency	Verification (Initials and Date)
archaeologist shall also investigate whether any trace of the historic-age Maupin Ditch remain within the API and if so, formally document this resource on the applicable Department of Parks and Recreation (DPR) 523 series forms, and assess its significance and eligibility for listing in the CRHR.		specialist.		
Mitigation Measure CUL-2: If previously unknown resources are encountered before or during grading activities, construction shall stop in the immediate vicinity of the find and a qualified historical resources specialist shall be consulted to determine whether the resource requires further study. The qualified historical resources specialist shall make recommendations to the City on the measures that shall be implemented to protect the discovered resources, including but not limited to excavation of the finds and evaluation of the finds in accordance with Section 15064.5 of the CEQA Guidelines and the City's Historic Preservation Ordinance. If the resources are determined to be unique historical resources as defined under Section 15064.5 of the CEQA Guidelines, measures shall be identified by the monitor and recommended to the Lead Agency. Appropriate measures for significant resources could include avoidance or capping, incorporation of the site in green space, parks, or open space, or data recovery excavations of the finds.	Prior to and during construction activities	Construction contractor, qualified historical resources specialist	Planning and Development	

Table A: Mitigation Monitoring and Reporting Program

MITIGATION MEASURE	Timing for Mitigation Measure	Mitigation Responsibility	Monitoring/ Reporting Agency	Verification (Initials and Date)
No further grading shall occur in the area of the discovery until the Lead Agency approves the measures to protect these. Any historical artifacts recovered as a result of mitigation shall be provided to a City-approved institution or person who is capable of providing long-germ preservation to allow future scientific study.				
Mitigation Measure CUL-3: Subsequent to a preliminary City review of the project grading plans, if there is evidence that a project will include excavation or construction activities within previously undisturbed soils, a field survey and literature search for prehistoric archaeological resources shall be conducted. The following procedures shall be followed. If prehistoric resources are not found during either the field survey or literature search, excavation and/or construction activities can commence. In the event that buried prehistoric archaeological resources are discovered during excavation and/or construction activities, construction shall stop in the immediate vicinity of the find and a qualified archaeologist shall be consulted to determine whether the resource requires further study. The qualified archaeologist shall make recommendations to the City on the measures that shall be implemented to protect the discovered resources, including but not limited to excavation of the finds and evaluation of the finds in accordance with CEQA Guidelines Section 15064.5.	Prior to and during construction activities	Construction contractor, qualified archaeologist	Planning and Development	

Table A: Mitigation Monitoring and Reporting Program

MITIGATION MEASURE	Timing for Mitigation Measure	Mitigation Responsibility	Monitoring/ Reporting Agency	Verification (Initials and Date)
If the resources are determined to be unique prehistoric archaeological resources as defined under Section 15064.5 of the CEQA Guidelines, mitigation measures shall be identified by the monitor and recommended to the Lead Agency. Appropriate measures for significant resources could include avoidance or capping, incorporation of the site in green space, parks, or open space, or data recovery excavations of the finds. No further grading shall occur in the area of the discovery until the Lead Agency approves the measures to protect these resources. Any prehistoric archaeological artifacts recovered as a result of mitigation shall be provided to a City-approved institution or person who is capable of providing long-term preservation to allow future scientific study. If prehistoric resources are found during the field survey or literature review, the resources shall be inventoried using appropriate State record forms and submit the forms to the Southern San Joaquin Valley Information Center. The resources shall be evaluated for significance. If the resources are found to be significant, measures shall be identified by the qualified archaeologist. Similar to above, appropriate mitigation measures for significant resources could include avoidance or capping, incorporation of the site in green space, parks, or open space, or data recovery excavations of the finds.				

Table A: Mitigation Monitoring and Reporting Program

MITIGATION MEASURE	Timing for Mitigation Measure	Mitigation Responsibility	Monitoring/ Reporting Agency	Verification (Initials and Date)
In addition, appropriate mitigation for excavation and construction activities in the vicinity of the resources found during the field survey or literature review shall include an archaeological monitor. The monitoring period shall be determined by the qualified archaeologist. If additional prehistoric archaeological resources are found during excavation and/or construction activities, the procedure identified above for the discovery of unknown resources shall be followed.				
Mitigation Measure CUL-4: In the event that human remains are unearthed during excavation and grading activities of any future development project, all activity shall cease immediately. Pursuant to Health and Safety Code (HSC) Section 7050.5, no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98(a). If the remains are determined to be of Native American descent, the coroner shall within 24 hours notify the Native American Heritage Commission (NAHC). The NAHC shall then contact the most likely descendent of the deceased Native American, who shall then serve as the consultant on how to proceed with the remains. Pursuant to PRC Section 5097.98(b), upon the discovery of Native American remains, the landowner shall ensure that the immediate vicinity, according to generally accepted cultural or archaeological standards or practices, where the Native American human remains are located is not damaged or disturbed by further development activity until the landowner has discussed	During construction activities	Construction contractor	Planning and Development	

Table A: Mitigation Monitoring and Reporting Program

MITIGATION MEASURE	Timing for Mitigation Measure	Mitigation Responsibility	Monitoring/ Reporting Agency	Verification (Initials and Date)
and conferred with the most likely descendants regarding their recommendations, if applicable, taking into account the possibility of multiple human remains. The landowner shall discuss and confer with the descendants all reasonable options regarding the descendants' preferences for treatment.				
VI. ENERGY				
There are no significant impacts to Energy.				
VII. GEOLOGY AND SOILS				
Mitigation Measure GEO-1: Subsequent to a preliminary City review of the project grading plans, if there is evidence that a project will include excavation or construction activities within previously undisturbed soils, a field survey and literature search for unique paleontological/geological resources shall be conducted. The following procedures shall be followed. If unique paleontological/geological resources are not found during either the field survey or literature search, excavation and/or construction activities can commence. In the event that unique paleontological/geological resources are discovered during excavation and/or construction activities, construction shall stop in the immediate vicinity of the find and a qualified paleontologist shall be consulted to determine whether the resource requires further study. The qualified paleontologist shall make recommendations to the City on the measures that shall be implemented to protect the discovered resources, including but not limited to,	Prior to and during construction activities	Construction contractor, qualified paleontologist	Planning and Development	

Table A: Mitigation Monitoring and Reporting Program

MITIGATION MEASURE	Timing for Mitigation Measure	Mitigation Responsibility	Monitoring/ Reporting Agency	Verification (Initials and Date)
excavation of the finds and evaluation of the finds. If the resources are determined to be significant, mitigation measures shall be identified by the monitor and recommended to the Lead Agency. Appropriate mitigation measures for significant resources could include avoidance or capping, incorporation of the site in green space, parks, or open space, or data recovery excavations of the finds. No further grading shall occur in the area of the discovery until the Lead Agency approves the measures to protect these resources. Any paleontological/geological resources recovered as a result of mitigation shall be provided to a City-approved institution or person who is capable of providing long-term preservation to allow future scientific study. If unique paleontological/geological resources are found during the field survey or literature review, the resources shall be inventoried and evaluated for significance. If the resources are found to be significant, mitigation measures shall be identified by the qualified paleontologist. Similar to above, appropriate mitigation measures for significant resources could include avoidance or capping, incorporation of the project site in green space, parks, or open space, or data recovery excavations of the finds. In addition, appropriate mitigation for excavation and construction activities in the vicinity of the resources found during the field survey or literature review shall include a paleontological monitor. The monitoring period shall be determined by				

Table A: Mitigation Monitoring and Reporting Program

MITIGATION MEASURE	Timing for Mitigation Measure	Mitigation Responsibility	Monitoring/ Reporting Agency	Verification (Initials and Date)
the qualified paleontologist. If additional paleontological/geological resources are found during excavation and/or construction activities, the procedure identified above for the discovery of unknown resources shall be followed.				
VIII. GREENHOUSE GAS EMISSIONS				
There are no significant impacts to Greenhouse Gas Emissions.				
IX. HAZARDS AND HAZARDOUS MATERIALS				
There are no significant impacts to Hazards and Hazardous Materials.				
X. HYDROLOGY AND WATER QUALITY				
There are no significant impacts to Hydrology and Water Quality.				
XI. LAND USE AND PLANNING				
There are no significant impacts to Land Use and Planning.				
XII. MINERAL RESOURCES				
There are no significant impacts to Mineral Resources.				
XIII. NOISE				
Mitigation Measure NOI-1: The following best management practices shall be incorporated during development Project construction. 1. Noise and groundborne vibration construction activities whose specific location on the development Project site may be flexible (e.g., operation of compressors and generators, cement mixing, general truck idling) shall be conducted as far as possible from the nearest off-site land uses. 2. When possible, construction activities shall be	During project construction	Project Applicant and onsite construction manager	Planning and Development	

Table A: Mitigation Monitoring and Reporting Program

MITIGATION MEASURE	Timing for Mitigation Measure	Mitigation Responsibility	Monitoring/ Reporting Agency	Verification (Initials and Date)
scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels. 3. Flexible sound control curtains shall be placed around all drilling apparatuses, drill rigs, and jackhammers when in use. 4. The Project contractor shall use power construction equipment with state-of-the-art noise shielding and muffling devices. 5. Barriers such as flexible sound control curtains shall be erected around heavy equipment to minimize the amount of noise on the surrounding land uses to the maximum extent feasible during construction. 6. All construction truck traffic shall be restricted to truck routes approved by the City, which shall avoid residential areas and other sensitive receptors to the extent feasible. 7. A construction notice shall be prepared and shall include the following information: job site address, permit number, name and phone number of the contractor and owner or owner's agent, hours of construction allowed by code or any discretionary approval for the site, and City telephone numbers where violations can be reported. The notice shall be posted and maintained at the construction site prior to the start of construction and displayed in a location that is readily visible to the public and approved by the City.				
MM NOI-2: Construction Vibration. The use of heavy	During	Project	Planning and	

Table A: Mitigation Monitoring and Reporting Program

MITIGATION MEASURE	Timing for Mitigation Measure	Mitigation Responsibility	Monitoring/ Reporting Agency	Verification (Initials and Date)
construction equipment within 25 feet of existing structures shall be prohibited.	project construction	Applicant and onsite construction manager	Development	
XIV. POPULATION AND HOUSING				
There are no significant impacts to Population and Housing.				
XV. PUBLIC SERVICES				
There are no significant impacts to Public Services.				
XVI. RECREATION				
There are no significant impacts to Recreation.				
XVII. TRANSPORTATION				
There are no significant impacts to Transportation.				
XVII. TRIBAL CULTURAL RESOURCES				
Refer to Mitigation Measures CUL-1, CUL-2 and CUL-3 above.	Prior to and during construction activities	Construction contractor, qualified archaeologist, qualified historical resources specialist	Planning and Development	
XIX. UTILITIES AND SERVICE SYSTEMS				
There are no significant impacts to Utilities and Service Systems.				
XX. WILDFIRE				
There are no significant impacts to Wildfire.				
XXI. MANDATORY FINDINGS OF SIGNIFICANCE				

Table A: Mitigation Monitoring and Reporting Program

MITIGATION MEASURE	Timing for Mitigation Measure	Mitigation Responsibility	Monitoring/ Reporting Agency	Verification (Initials and Date)
There are no significant impacts related to Mandatory Findings of Significance.				

Source: LSA (May 2023).

San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

Small Project Analysis Levels (SPAL)

November 13, 2020

The San Joaquin Valley Air Pollution Control District (District) has published guidance on determining potential significant impacts and potential mitigation of significant impacts in its Guidance for Assessing and Mitigating Air Quality Impacts (GAMAQI).

The District has established thresholds of significance for criteria pollutant emissions, which are based on the District's New Source Review (NSR) offset requirements for stationary sources. Using the project type, size, and number of vehicle trips, the District has pre-quantified emissions and determined values below which it is reasonable to conclude that a project would not exceed applicable thresholds of significance for criteria pollutants.

In the interest of streamlining CEQA requirements, projects that fit the below descriptions up to the project sizes indicated, and are below **both** of the corresponding non-HHDT and HHDT trip lengths, are deemed to have a less than significant impact on air quality and as such are excluded from quantifying criteria pollutant emissions for CEQA purposes.

Notes: HHDT means "Heavy-Heavy Duty Trucks". SPAL analysis was performed based on CalEEMod version 2016.3.2

Table 1: Residential

Land Use Type	Size	Unit		Average Daily One-way Trips for all fleet types (except HHDT)	Average Daily One-way for HHDT Trips only (50 mile trip length)
Single Family	155	dwelling unit	AND LESS THAN	800	15
Apartment, Low Rise	224	dwelling unit			
Apartment, Mid Rise	225	dwelling unit			
Apartment, High Rise	340	dwelling unit			
Condominums/Townhouse	256	dwelling unit			
Condominums, High Rise	352	dwelling unit			
Mobile Home Park	292	dwelling unit			
Retirement Community	580	dwelling unit			
Congregate Care Assisted Living	536	dwelling unit			

Table 2: Commercial

Land Use Type	Size	Unit		Average Daily One-way Trips for all fleet types (except HHDT)	Average Daily One-way for HHDT Trips only (50 mile trip length)
General Office Building	200,000	square feet	AND LESS THAN	1,000	15
Office Park	190,000	square feet			
Government (Civic Center)	92,000	square feet			
Government Office Building	40,000	square feet			
Medical Office Building	68,000	square feet			
Research & Development	256,000	square feet			
Hospital	130,400	square feet			
Bank (with Drive-Through)	19,600	square feet		1,600	25
Pharmacy/Drugstore w/o Drive Thru	24,800	square feet			
Pharmacy/Drugstore with Drive Thru	23,200	square feet			

Table 3: Retail

Land Use Type	Size	Unit		Average Daily One-way Trips for all fleet types (except HHDT)	Average Daily One-way for HHDT Trips only (50 mile trip length)
Free Standing Discount Store	34,000	square feet	AND LESS THAN	1,250	25
Regional Shopping Center	47,000	square feet			
Discount Club Store	30,000	square feet			
Supermarket	18,400	square feet			
Free-Standing Discount Superstore	37,600	square feet			
Hardware/Paint Store	36,000	square feet			
Convenience Market (w/o gas pumps)	18,500	square feet		1,900	35
Convenience Market (w gas pumps)	3,300	square feet			
Gasoline/Service Station	16	pump			
Automobile Care Center	105,000	square feet		1,550	25
Electronic Superstore	52,000	square feet			
Home Improvement Superstore	60,000	square feet			
Strip Mall	49,600	square feet		375	7

Table 4a: Industrial

Land Use Type	Size	Unit		Average Daily One-way Trips for all fleet types (except HHDT)	Average Daily One-way for HHDT Trips only (50 mile trip length)
General Light Industry	280,000	square feet	AND LESS THAN	550	70
Heavy Industry	900,000	square feet			
Industrial Park	295,000	square feet			
Manufacturing	472,000	square feet			

Table 4b: Industrial (Warehouse)

Land Use Type	Size	Unit		Average Daily One-way Trips for all fleet types (except HHDT)	Average Daily One-way for HHDT Trips only (146 mile trip length)
Refrigerated Warehouse - No Rail	190,000	square feet	AND LESS THAN	140	15
Refrigerated Warehouse - Rail		square feet			
Unrefrigerated Warehouse - No Rail		square feet			
Unrefrigerated Warehouse - Rail		square feet			

Table 4c: Industrial (Warehouse)

Land Use Type	Size	Unit		Average Daily One-way Trips for all fleet types (except HHDT)	Average Daily One-way for HHDT Trips only (146 mile trip length)
Refrigerated Warehouse - No Rail	190,000	square feet	AND LESS THAN	N/A	25
Refrigerated Warehouse - Rail		square feet			
Unrefrigerated Warehouse - No Rail		square feet			
Unrefrigerated Warehouse - Rail		square feet			

Table 5: Educational

Land Use Type	Size	Unit		Average Daily One-way Trips for all fleet types (except HHDT)	Average Daily One-way for HHDT Trips only (50 mile trip length)
Elementary School	1,880	student	AND LESS THAN	1,000	15
Elementary School	156,000	square feet			
Junior High School	1,440	student			
Junior High School	168,800	square feet			
High School	1,160	student			
High School	153,600	square feet			
Junior College (2 year)	1,720	student			
Junior College (2 year)	74,400	square feet			
University/College (4 year)	1,120	student			
Library	38,400	square feet			
Place of Worship	141,000	square feet			
Day Care Center	40,000	square feet		1,500	25

Table 6: Recreational

Land Use Type	Size	Unit		Average Daily One-way Trips for all fleet types (except HHDT)	Average Daily One-way for HHDT Trips only (50 mile trip length)
High Turnover (Sit Down Restaurant)	16,800	square feet		1,500	25
Quality Restaurant	24,800	square feet			
Fast Food Restaurant with Drive Thru	4,500	square feet			
Fast Food Restaurant w/o Drive Thru	2,950	square feet	AND LESS THAN	1,100	20
Hotel	228	room			
Motel	300	room			
Arena	168,000	square feet			
City Park	256	acre			
Golf Course	368	acre			
Health Club	64,000	square feet			
Racquet Club	124,000	square feet			
Recreational Swimming Pool	70,400	square feet			
Movie Theater (No Matinee)	23,200	square feet			

BARGAS
Environmental Consulting

September 26, 2022

Devin Tienken
Legacy Construction
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Email: devin@lcfresno.com

Subject: Biological Resources Letter Report for the Willow and Nees Commercial Project in City of Fresno, California

Dear Devin Tienken:

This letter provides the results of an assessment of biological resources conducted for OPEK Investments, LLC (OPEK) for the Willow and Nees Commercial Project (hereafter, "Project") located at 7819 and 7835 North Willow Avenue, City of Fresno, Fresno County, California (Project site). As described herein, no natural vegetation or State or Federally listed sensitive species were observed on the Project site during the habitat assessment. Areas within and adjacent to the Project site have the potential to attract nesting birds protected by the Migratory Bird Treaty Act (MBTA). Recommendations to address this potential are provided in the Conclusions and Recommendations section of this letter. The following letter details the resources analyzed during desktop analysis and methods used during the field survey.

Project Location and Description

OPEK is currently proposing to develop a 3.5-acre site comprised of single-story medical and professional office facilities at 7819 and 7835 North Willow Avenue in Fresno, California. The Project site is comprised of Fresno County Assessor's Parcel Numbers (APNs) 404-481-19S and 404-481-20S as shown in **Attachments A** and **B**. The Project is located within Section 36 of Township 12 South, Range 20 East of the US Geological Survey's 7.5-minute *Clovis* Quadrangle.

Methods

Desktop Review

Before conducting a habitat assessment of the Project site, Bargas biologists performed an initial review of literature and data sources to characterize the biological conditions on the Project site and to compile records of sensitive biological resources, including occurrences of special-status species, in the Project vicinity. The following resources were reviewed prior to the field visit:

- Critical habitat layers provided by the United States Fish and Wildlife Service (USFWS) to determine the occurrence of critical habitat for federally listed species within three miles of the Project site (USFWS 2022a);
- USFWS *Information for Planning and Consultation* (IPaC) portal for a list of federally listed species and designated critical habitat as provided by uploading a shapefile depicting the limits of the Project site (USFWS 2022b) (Attachment B);
- California Department of Fish and Wildlife's (CDFW) California Natural Diversity Database for special-status species and habitat records within a 3-mile buffer of the Project site (CDFW 2022);
- USFWS National Wetlands Inventory (NWI) to determine if surface waters and wetlands have been mapped on or adjacent to the Project (USFWS 2022c);
- National Resource Conservation Service soil survey maps and unit descriptions to map and describe soil(s) on the Project site (NRCS USDA 2022);

- Google Earth Pro aerial map images of the Project site and the vicinity, including historical aerial images; and
- USGS *Clovis* 7.5-minute topographic quadrangle maps of the Project site (USGS 1982).

Field Survey

A biological survey was conducted by Bargas biologist Rachel Clark on August 8, 2022 between 0812 and 0946h, with temperatures ranging between 70 and 75°F with partly cloudy skies and a light breeze. The survey consisted of a visual search for any habitat that might support the following special status species identified during the desktop review: Sanford's Arrowhead (*Sagittaria sanfordii*), Greene's Tuctoria (*Tuctoria greenei*), Vernal Pool Fairy Shrimp (*Branchinecta lynchi*), Conservancy Fairy Shrimp (*Branchinecta conservatio*), Monarch Butterfly (*Danaus plexippus*), California Tiger Salamander (*Ambystoma californiense*), Giant Gartersnake (*Thamnophis gigas*), Blunt-nosed Leopard Lizard (*Gambelia sila*), Western Grebe (*Aechmophorus occidentalis*), Clark's Grebe (*Aechmophorus clarkii*), Golden Eagle (*Aquila chrysaetos*), Bald Eagle (*Haliaeetus leucocephalus*), Short-billed Dowitcher (*Limnodromus griseus*), Black Tern (*Childonias niger*), Western Yellow-billed Cuckoo (*Coccyzus americanus occidentalis*), Nuttall's Woodpecker (*Dryobates nuttallii*), Olive-sided Flycatcher (*Contopus cooperi*), Oak Titmouse (*Baeolophus inornatus*), Wrentit (*Chamaea fasciata*), California Thrasher (*Toxostoma redivivum*), Common Yellowthroat (*Geothlypis trichas*), Belding's Savannah Sparrow (*Passerculus sandwichensis beldingi*), Tricolored Blackbird (*Agelaius tricolor*), Bullock's Oriole (*Icterus bullockii*), Lawrence's Goldfinch (*Spinus lawrencei*), San Joaquin Kit Fox (*Vulpes macrotis mutica*), Fresno Kangaroo Rat (*Dipodomys nitratoides exilis*), and Delta Smelt (*Hypomesus transpacificus*).

The survey included an investigation of the Project site and surrounding 500-foot buffer area (also referred to as the Biological Survey Area or BSA). The survey was conducted by walking meandering transects throughout the Project site and using 8x42 binoculars to ensure full visual coverage of the BSA. The field survey was conducted following applicable survey protocols or guidelines as outlined below based on the results of this analysis.

The surveyor searched for the following habitat features based on the results of the desktop review: vernal pools, wetlands, riparian habitats, saltbush scrub, annual and alkali grasslands, oak savanna, evergreen forest, chaparral, mudflats, milkweed (*Asclepias*) plants, large trees and shrubs, and small mammal burrows.

Results

Biological Setting

The Project site is highly disturbed and comprised primarily of a dirt lot (where private residential homes were removed from) and a small amount of non-native vegetation. The Project site and immediately surrounding areas have no native or natural vegetation communities. The Project site is relatively flat with elevations ranging from approximately 358 feet above mean sea level (amsl) to approximately 364 feet amsl. The Project site is bound by scattered businesses, private residences, and grassy fields to the north, to the east by Willow Avenue and The Depot Shopping Center, to the south by Crosscity Christian Church property, and to the west by a residential neighborhood. Representative site photographs are provided in **Attachment A.**

Aquatic Resources

A review of USGS topographic maps, the USFWS NWI, Google Earth Pro aerial imagery, and historic aerial photographs revealed no evidence of potentially jurisdictional water features or wetlands on or immediately adjacent to the Project site. No drainage features (i.e., riparian/riverine or ditches or water features) were observed on-site during the survey.

Plants

Plant species observed on the Project site included Prickly Lettuce (*Lactuca serriola*), Lamb's Quarter (*Chenopodium album*), puncture vine (*Tribulus* species), Jimsonweed (*Datura stramonium*), Pomegranate (*Punica granatum*), Tree of

Heaven (*Ailanthus altissima*), *oak* (*Quercus* sp.), eucalyptus (*Eucalyptus* species), unknown stone fruit trees, and various non-native grasses.

Plants and Wildlife

Most plants and wildlife species observed were typical of those found within urbanized residential areas and associated habitats. Nine bird species were detected during the survey: Canada Goose (*Branta canadensis*), Mourning Dove (*Zenaida macroura*), Black Phoebe (*Sayornis nigricans*), California Scrub-Jay (*Aphelocoma californica*), American Crow (*Corvus brachyrhynchos*), Northern Mockingbird (*Mimus polyglottos*), Lesser Golfinch (*Spinus psaltria*) House Finch (*Haemorhous mexicanus*), and House Sparrow (*Passer domesticus*).

The biologist thoroughly covered the BSA to determine if suitable habitat was present for any of the special status species identified during the desktop review. The following summarizes the biologist's observations:

- **Sanford's Arrowhead**, California Rare Plant Rank 1B.2. This species is associated with freshwater wetlands and wetland-riparian habitats. No evidence of Sanford's Arrowhead or associated wetland habitat was observed in the BSA. Therefore, there is no potential for Sanford's Arrowhead to occur on the Project site.
- **Greene's Tuctoria**, California Rare Plant Rank 1B.1, State Listed Rare (SR), Federally Endangered (FE). This species is associated with freshwater wetlands, Valley grassland, and vernal pool habitats. The BSA does not contain any freshwater wetland, Valley grassland, or vernal pool habitat. Slight depressions were observed on the Project site where structures have been removed, however, no water was observed in any of the depressions during the site survey, and no evidence of water features was observed in historic aerial photographs. Therefore, there is no potential for Greene's Tuctoria to occur on the Project site.
- **Vernal Pool Fairy Shrimp**, Federally Threatened (FT). This species is associated with vernal pool habitats. No evidence of Vernal Pool Fairy Shrimp or associated vernal pool habitat was observed in the BSA. Slight depressions were observed on the Project site where structures have been removed, however, no water was observed in any of the depressions during the site survey, and no evidence of water features was observed in historic aerial photographs. Therefore, there is no potential for Vernal Pool Fairy Shrimp to occur on the Project site.
- **Conservancy Fairy Shrimp**, FE. This species is associated with vernal pool habitats. No evidence of Conservancy Fairy Shrimp or associated vernal pool habitat was observed in the BSA. Slight depressions were observed on the Project site where structures have been removed, however, no water was observed in any of the depressions during the site survey, and no evidence of water features was observed in historic aerial photographs. Therefore, there is no potential for Conservancy Fairy Shrimp to occur on the Project site.
- **Monarch Butterfly**, Federal Candidate (FC, California overwintering population). This species is associated with milkweed host plants for breeding and food source, and large trees such as blue gum (*Eucalyptus globulus*), red gum (*E. camadulensis*), Monterey pine (*Pinus radiata*), Monterey cypress (*Cupressus macrocarpa*), western sycamore (*Platanus racemosa*), coast redwood (*Sequoia sempervirens*), and coast live oak (*Quercus agrifolia*) for roosting. The majority of the overwintering sites in California occur along the coast (within 1.5 miles from the Pacific Ocean or San Francisco) (Western Monarch Milkweed Mapper 2018). The Project site is 114 miles east of the Pacific Ocean and no evidence of Monarch Butterfly or any of its larval host plants (*Asclepias* species) was observed in the BSA. Therefore, there is no potential for Monarch Butterfly to occur on the Project site.
- **California Tiger Salamander (central California DPS)**, FT, State Threatened (ST). This species is associated with vernal pools and other shallow ephemeral aquatic features for breeding, and with small mammal burrows for upland refugia. No evidence of California Tiger Salamander or suitable aquatic or upland habitat was observed on the Project site. However, there is a water retention basin located approximately 0.24 mile southwest of the Project site that does not provide potentially suitable breeding habitat for this species. There are no potentially

suitable breeding sites within a mile of the Project site. Therefore, there is no potential for California Tiger Salamander to occur on the Project site.

- **Giant Gartersnake**, FT, ST. This species is associated with various aquatic features such as canals, sloughs, ponds, small lakes, low gradient streams, and adjacent wetlands. No evidence of Giant Gartersnake or suitable aquatic habitat features for this species was observed in the BSA. Therefore, there is no potential for Giant Gartersnake to occur on the Project site.
- **Blunt-nosed Leopard Lizard**, FE, State Endangered (SE), State Fully Protected (SFP). This species is associated with open, sparsely vegetated areas, saltbush scrub, alkali playa, and rodent burrows for shelter. No evidence of Blunt-nosed Leopard Lizards, or alkali playa or saltbush scrub habitat used by this species was observed in the BSA. Additionally, no suitable small mammal burrows were observed in the Project area. Therefore, there is no potential for Blunt-nosed Leopard Lizard to occur on the Project site.
- **Western Grebe.** This species is associated with freshwater lakes and marshes. A water retention basin located approximately 0.24 miles southwest of the Project site has the potential to host migrating Western Grebes, but no evidence of this species or suitable aquatic habitat was observed on the Project site. Therefore, there is no potential for Western Grebe to occur on the Project site.
- **Clark's Grebe.** This species is associated with freshwater lakes and marshes, and tidal waters. A water retention basin located approximately 0.24 miles southwest of the Project site has the potential to host migrating Clark's Grebes, but no evidence of Clark's Grebe or suitable aquatic habitat was observed on the Project site. Therefore, there is no potential for Clark's Grebe to occur on the Project site.
- **Golden Eagle,** CDFW Fully Protected (CDFW FP), United States Fish and Wildlife Service Birds of Conservation Concern (USFWS BCC). This species is associated with rolling foothills, mountain areas, sage-juniper flats, and desert. No evidence of Golden Eagle or suitable habitat for this species was observed on the Project site or the surrounding areas. Therefore, there is no potential for Golden Eagle to occur on the Project site.
- **Bald Eagle**, SE, SFP, USFWS BCC. This species is associated with large water bodies for foraging and large trees adjacent to water bodies for nesting and perching. No Bald Eagles or suitable habitat for this species was observed in the BSA. Therefore, there is no potential for Bald Eagle to occur on the Project site.
- **Short-billed Dowitcher**. This species is associated with intertidal mudflats and estuarine habitats, shallow ponds and lakes, and irrigated fields. A water retention basin located approximately 0.24 mile southwest of the Project site has the potential to host migrating Short-billed Dowitchers, but no evidence of this species was detected and no suitable habitat was observed on the project site. Therefore, there is no potential for Short-billed Dowitcher to occur on the Project site.
- **Black Tern,** CDFW Species of Special Concern (SSC). This species is associated with freshwater emergent wetlands, bays, salt ponds, river mouths, and pelagic waters. A water retention basin located approximately 0.24 mile southwest of the Project site has the potential to host migrating or nesting Black Terns, but no evidence of this species or suitable habitat for this species was observed on the Project site. Therefore, there is no potential for Black Tern to occur on the Project site.
- **Western Yellow-billed Cuckoo,** ST, FE. This species is associated with extensive riparian woodlands, often consisting of willow, cottonwood, and sycamore. This species requires dense canopy cover with high native tree density, and breeding territories are large, typically 20 hectares in size. No evidence of Western Yellow-billed Cuckoo or suitable habitat for this species was observed in the BSA. The nearest potentially suitable habitat for this species is along the San Joaquin River, approximately 3.7 miles to the northeast of the Project area. Therefore, there is no potential for Western Yellow-billed Cuckoo to occur on the Project site.

- **Nuttall's Woodpecker.** This species is associated with oak woodlands from 900' to 5,500' in elevation. No evidence of Nuttall's Woodpecker or suitable oak woodland habitat was observed in the BSA. Although two different oak trees were observed on the Project site during the survey, the habitat is not sufficient to support populations of this species. Therefore, there is no potential for Nuttall's Woodpecker to occur on the Project site.
- **Olive-sided Flycatcher**, CDFW SSC, USFWS BCC. This species is associated with openings or edges of coniferous forests from sea level to 10,000' in elevation. No evidence of Olive-sided Flycatcher or suitable evergreen forest habitat was observed in the BSA. Therefore, there is no potential for Olive-sided Flycatcher to occur on the Project site.
- **Oak Titmouse.** This species is associated with dry, open oak or oak-pine woodlands. No evidence of Oak Titmouse or suitable oak or oak-pine woodland was observed in the BSA. Therefore, there is no potential for Oak Titmouse to occur on the Project site.
- **Wrentit.** This species is associated with coastal scrub and chaparral habitats. No evidence of Wrentit or suitable coastal scrub or chaparral habitat was observed in the BSA. Therefore, there is no potential for Wrentit to occur on the Project site.
- **California Thrasher.** This species is associated with chaparral habitat. No evidence of California Thrasher or suitable chaparral habitat was observed in the BSA. Therefore, there is no potential for California Thrasher to occur on the Project site.
- **Common Yellowthroat.** This species is associated with wet meadows, freshwater emergent wetlands, saline emergent wetlands, valley foothill riparian habitats, desert riparian, annual grasslands, and perennial grasslands. A water retention basin located approximately 0.24 mile to the southwest of the Project site has the potential to host migrating or breeding Common Yellowthroats, but no evidence of this species or suitable habitat for this species was observed on the Project site. Therefore, there is no potential for Common Yellowthroat to occur on the Project site.
- **Belding's Savannah Sparrow**, SE, USFWS BCC. This species is associated with coastal saltmarsh habitat and has occurred historically from Goleta to the Tijuana River Estuary. No evidence of Belding's Savannah Sparrow or suitable coastal saltmarsh habitat was observed in the BSA. In addition to the lack of suitable habitat for this species, the Project area is approximately 170 miles away from the northernmost part of its range. Therefore, there is no potential for Belding's Savannah Sparrow to occur on the Project site.
- **Tricolored Blackbird**, ST, CDFW SSC, USFWS BCC. This species is associated with wetlands containing dense vegetation and agricultural fields for breeding, and with cultivated fields, wetlands, and feedlots for foraging. There is potentially suitable habitat for this species approximately 0.24 mile to the southwest at a water retention basin, but no evidence of Tricolored Blackbird or suitable breeding or foraging habitat was observed in the BSA. Therefore, there is no potential for Tricolored Blackbird to occur on the Project site.
- **Bullock's Oriole.** This species is associated with riparian and open woodlands, and even urban and residential areas with suitable habitat. No evidence of Bullock's Oriole or suitable woodland habitat was observed on the Project site, but suitable nest trees were observed in the BSA to the north and south. Therefore, the potential for Bullock's Oriole to occur on the Project site is medium.
- **Lawrence's Goldfinch, USFWS BCC.** This species is associated with dry, open oak woods with chaparral, weedy fields, and freshwater sources. No evidence of Lawrence's Goldfinch or suitable oak woodlands was observed in the BSA. While it is not likely for this species to nest in the BSA, the Project site contains sections of open, weedy habitat that have the potential to attract foraging flocks of this species. Therefore, the potential for Lawrence's Goldfinch to occur on the Project site is medium.

- **San Joaquin Kit Fox**, FE, ST. This species is associated with open grassland and scrub communities with loose soils for denning. No evidence (i.e., dens) of San Joaquin Kit Fox was observed in the survey area. There are no known populations of this species in or near the BSA. According to the USFWS Species Status Assessment Report for San Joaquin Kit Fox, the closest population of San Joaquin Kit Fox is approximately 80 miles south of the Project area, near Delano (USFWS 2020). Therefore, there is no potential forSan Joaquin Kit Fox to occur on the Project site.
- **Fresno Kangaroo Rat**, FE, SE. This species is associated with alkali sink open grassland. No evidence of Fresno Kangaroo Rat or suitable habitat for this species was observed in the BSA. Therefore, there is no potential for Fresno Kangaroo Rat to occur on the Project site.
- **Delta Smelt**, FT, SE. This species is associated with estuarine habitats in the Suisun Bay upstream through the Delta in Contra Costa, Sacramento, San Joaquin, Solano, and Yolo Counties. No evidence of Delta Smelt or suitable aquatic habitat for this species was observed in the BSA. Therefore, there is no potential for Delta Smelt to occur on the Project site.

Conclusions and Recommendations

No State or Federally listed sensitive species or natural vegetation were observed on the Project site during the habitat assessment. Bird species protected by the Migratory Bird Treaty Act (MBTA) can occur almost anywhere, including disturbed and heavily landscaped areas. Open, less vegetated areas in the survey area can encourage ground-nesting by species such as Mourning Dove, which was observed on the Project site. Small trees of various species scattered throughout the Project site have the potential to attract nesting birds, especially as the trees grow larger. An oak tree and an unknown stone fruit tree located along a fence at the southeast corner of the Project site have the potential to attract nesting birds. Areas adjacent to the Project site that also have the potential to attract nesting birds, including raptors, are the evergreen trees on the Crosscity Christian Church property to the south, and large trees scattered among private properties to the north.

Based upon the results of this assessment of biological resources, Bargas makes the following recommendations:

1) If construction is to take place during nesting bird season (typically, February 1 through August 31), it is recommended that a qualified biologist perform a preconstruction nesting bird survey on the Project site and within a 300-foot buffer to locate potential nests of species protected by the Migratory Bird Treaty Act.

2) Additionally, if construction is to take place during the active nesting season for Swainson's Hawk (March 1 through August 15), it is recommended that a qualified biologist perform a preconstruction nesting bird survey on the Project site and within a one-half mile buffer to determine the presence of nesting Swainson's Hawks. If active Swainson's Hawk nests are identified within a half mile of the Project site, the Project proponent will coordinate with CDFW to develop and implement suitable avoidance measures (e.g., 500 feet) and nest monitoring during construction.

We thank you for the opportunity to work on this Project. Should you have any questions or comments regarding this letter, please do not hesitate to contact the Project Manager, Patrick Sauls, at (916) 838-1461 or psauls@bargasconsulting.com.

Sincerely,



Rachel Clark

Biologist

Attachments:

- Attachment A: Site Photographs
- Attachment B. Figures

Literature Cited

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Attachment A. Site Photographs



Photo 1. Photo taken facing north from the south end of the Project site.



Photo 2. Photo facing east from the west end of the Project site.



Photo 3. Photo facing south from the north end of the Project site.



Photo 4. Photo facing west from the east end of the Project site.



Photo 5. Graded pad where structure where was removed from. Also visible is open ground which may be attractive to certain ground nesting birds.



Photo 6. Young trees in the Project area, which will become more suitable for nesting birds as they grow larger.



Photo 7. Oak tree and unknown stone fruit tree at the southeast corner of the Project site that provide suitable nesting bird habitat.



Photo 8. Evergreen trees on Crosscity Christian Church property south of the Project site, which have the potential to attract nesting birds, including raptors.



Photo 9. Large trees scattered among private properties north of the Project site which have the potential to attract nesting birds, including raptors.

Attachment B. Figures

March 2, 2023

Seth Ramirez
OPEK Investments, LLC
1900 Shaw Ave., Suite 101
Clovis, CA 93611
Phone: (559) 291-1922
Email: seth@lcfresno.com

Subject: Cultural Resources Assessment Summary Letter Report for the Willow Nees Commercial Project in Unincorporated Fresno County, California

Dear Seth Ramirez:

Bargas Environmental Consulting (Bargas) is under contract with OPEK Investments, LLC (OPEK) to prepare a cultural resources assessment for the proposed Willow Nees Commercial Project (Project) in unincorporated Fresno County, California. This summary letter report provides the results of the cultural resources assessment conducted for the Project and has been completed in compliance with the California Environmental Quality Act (CEQA).

The proposed Project includes commercial development of the 3.5-acre Project site located at 7819 and 7835 North Willow Avenue in an unincorporated area of Fresno County near the cities of Fresno and Clovis (Attachment A, Figures 1 and 2). The Project area encompasses Fresno County Assessor's Parcel Number (APN) 404-481-19S and 404-481-20S. The Project consists of the proposed construction of three buildings and associated parking and landscaping elements for a single-story medical and professional office facility.

Project Location and Description

The Project is located in a residential area in an unincorporated Fresno County island surrounded by the cities of Fresno and Clovis, with rural residences to the north, single-family residences to the west, a church to the south, and commercial buildings to the east. OPEK proposes to annex the Project site into the City of Fresno. The Project lies within Section 36 of Township 12 South, Range 20 East, as shown on the *Clovis, California* United States Geological Survey (U.S.G.S) topographic quadrangle (Attachment A, Figure 3).

OPEK previously demolished two existing single-family residences and their associated structures, including all landscaping elements, trees, vegetation, and residential utilities such as potential wells or septic systems, within the Project area. The Project includes the construction of two 9,500 square-foot buildings and one 11,400 square-foot building, as well as associated parking, landscaping, and site improvements at 7819 and 7835 North Willow Avenue. The Project site will be accessed by two existing vehicle driveways located along North Willow Avenue to the east, and two along an unnamed existing alleyway to the south.

The area of potential impacts (API) is defined as the entirety of the project footprint, which includes all proposed work activities and access roads (see Attachment A, Figure 2). The API consists of a vacant lot, populated by grasses and weeds. Given the previous disturbances within the API from the original construction of the two single-family residences and their associated structures and landscaping and the subsequent demolition of those structures and landscaping elements, there is no native ground surface remaining with the API.

Regulatory Framework

This report was prepared in compliance with CEQA and the California Public Resources Code (PRC). According to Section 15064.5 of the CEQA Guidelines, the potential impacts of a proposed project on significant cultural resources must be considered during the planning process. A project that may cause a substantial adverse effect on the significance of a historical resource is a project that may have a significant effect on the environment. If a project would result in significant adverse effects on historical resources, then alternative plans or mitigation measures must be considered; however, only significant historical resources need to be addressed.

Per CEQA, significant resources, defined as "historical resources," are those that are: 1) determined eligible for, or are listed in, the California Register of Historical Resources (CRHR), 2) included in a local register of historical resources, or 3) any buildings, sites, structures, objects, or districts, which may have historical, pre-historical, architectural, archaeological, cultural, or scientific importance and that a lead agency determines to be historically significant. PRC Section 5024.1 requires evaluation of historical resources to determine their eligibility for listing in the CRHR. The purpose of the register is to maintain listings of California's historical resources and to indicate which resources are to be protected from substantial adverse change. The criteria for listing resources in the CRHR were expressly developed to be in accordance with previously established federal criteria for listing in the National Register of Historic Places (NRHP).

The CEQA process for identifying potential impacts to cultural resources includes: (a) the identification of cultural resources (resources greater than 45 years in age) within a proposed project area; (b) an evaluation of whether the identified resources qualify as historical resources; (c) an assessment to determine whether a project may have a significant impact on historical resources, including tribal cultural resources as defined at PRC Section 21074; and finally (d) the development of avoidance/preservation measures or mitigation measures that would preferably avoid impacts or reduce potential impacts to a level that is less than significant.

Methods

This cultural resources assessment included a records search conducted at the Southern San Joaquin Valley Information Center (SSJVIC) at California State University, Bakersfield, review of properties listed on the National Register of Historic Places (NRHP and the California Register of Historical Resources (CRHR), a review of historic maps and aerial photographs/imagery, and a search of the Native American Heritage Commission's (NAHC) Sacred Lands File (SLF).

Records Search Results

A records search was conducted by staff at the SSJVIC on September 12, 2022. This search included the API and a 0.5-mile radius (see Attachment A, Figure 3) and reviewed previously conducted studies and previously identified cultural resources located within the API and the surrounding area.

Previous Cultural Resources Studies

Six previous investigations have been conducted within 0.5 mile of the Project API (Table 1). Two of these investigations overlapped the API, one of which is an Historic Property Survey Report (FR-02318) (Morlet 2009) and one is an Archaeological Survey Report (FR-02319) (Baloian 2009). Both studies were conducted in 2009 and did not result in the identification of existing cultural resources within the Project API (Table 1). While Morlet (2009) did not identify any cultural resources within the current API, Baloian (2009) identified the possibly historic-era (i.e., 50 years old or older) Maupin Ditch while conducting archival research (Baloian 2009). As observed on USGS topographic maps, this ditch runs parallel to Willow Avenue and crosses the current API. However, Baloian did not observe the ditch during pedestrian survey, and he also notes that it has likely been "piped underground" (Baloian 2009).

Table 1. Previous Investigations within 1-mile of the Project API

Report Number (FR-)	Year	Title	Author and Affiliation	Overlaps API
01006	1988	Archaeological Field Reconnaissance Report Summary for the Chestnut-Willow Avenue Project, Fresno County, California	Wren, Donald	Outside
01844	2001	Historical and Cultural Resource Assessment for the Willow/Herndon, Site No. CV-735-03	Derr, Eleanor H. and Brown, R. Keith; Brown & Mills, Inc.	Outside
01880	2002	Cultural Resource Assessment for Cingular CV-735-02, Willow/Herndon	Holson, John; Pacific Legacy, Inc.	Outside
01946	2003	Section 106 Review of the Proposed Bechtel Corporation Project "Buchanan," Located at the Southeast Corner of Willow Avenue and Nees Avenue in Clovis, Fresno County, California	Moore, Holly D.; ATC Associates, Inc.	Outside
02318	2009	Architectural Survey Report, Willow Avenue Widening in the City of Fresno between Secatur and Perrin, Fresno County, California	Morlet, Aubrie; Applied Earthworks, Inc.	Overlaps
02319	2009	Archaeological Survey Report for the Willow Avenue Widening in the City of Fresno Between Decatur and Perrin Avenues, Fresno County, California	Baloian, Randy; Applied Earthworks, Inc.	Overlaps

Known Cultural Resources

One known cultural resource (P-10-003930/CA-FRE-003109H) was identified within 0.5-mile of the API. The resource is located approximately 0.35 miles north/northeast of and outside the API. This resource was originally documented in 1998 (Norton 1998). No previously recorded cultural resources were identified within the API. No prehistoric resources have been recorded within 0.5 mile of the API.

P-10-003930 (CA-FRE-003109H) is a portion of the historic-era Southern Pacific Railroad alignment, which extends through the cities of Fresno and Clovis. The portion of the Southern Pacific Railroad closest to the API was constructed between 1872 and 1873. The ballast, ties, spikes, and rails does not appear to be extant and the railroad grade alignment is now used as a jogging and bike trail (Fresno-Clovis Rail-Trail) (Baloian 2013, 2015; Freeman and Flores 2009; Hibma 2010; Hooper and Flint 1999; Jones 2018a,b; Larson and Toffelmier 2004; McCausland 2018; Murphy 2002; Norton 1998; Tibbet 2016).

No NRHP or CRHR-listed or eligible resources or locally significant buildings or structures were identified within 0.5 mile of the API as a result of the review of the NRHP and CRHR (City of Clovis 2014).

Sacred Lands File Search Results

The NAHC maintains the confidential SLF, which contains information on sites of traditional, cultural, or religious value to the Native American community. A search of the SLF was requested from the NAHC on August 31, 2021 (Attachment B). Bargas received a response from the NAHC on October 28, 2022, stating the SLF search was negative. However, the NAHC noted that while the results are negative this does not guarantee the absence of cultural resources within the Project API. The NAHC identified Native American Tribes and representatives that may have knowledge of cultural resources within the area. Correspondence between Bargas and the NAHC is provided in Appendix B.

Historic Map and Aerial Imagery Review Results

A review of available aerial imagery and historic maps reveals that the Project API is currently vacant land that was cleared of all structures sometime between 2020 and 2022 (Google Earth 2022). As early as 1962, the API was utilized as an agricultural field. Orchards were cultivated to the south of the API in 1965 and within the API in 1982. The orchards were likely removed sometime between 1982 and 1998. Historic aerial maps indicate that the surrounding street alignments were in place by 1923 and by 1947, East Nees Avenue to the north, East Alluvial Avenue to the south, North Willow Avenue to the east and North Chestnut Avenue to the west, all were depicted with their modern names (NETROnline 2022).

The earliest structures within the API are depicted in 1974 topographic maps as two rectangular structures adjacent to Willow Avenue. A shed is visible as well in the southwest portion of the API in 1972 aerial imagery. A ditch ("Maupin Ditch"), located adjacent to North Willow Avenue and within the API, is visible in 1962 aerial imagery and is depicted on 1965 historic topographic maps. The ditch is also depicted in the 1972 and 1984 topographic maps but is not visible on topographic maps beyond 1998. Modern aerial imagery indicates that the ditch was likely demolished when North Willow Avenue was widened, and a sidewalk was installed on the western shoulder of the road, sometime between 1998 and 2002 (NETROnline 2022).

Summary and Recommendations

No previously recorded cultural resources were identified within or overlapping the APE as a result of the SSJVIC records and a search of the NAHC's SLF search returned negative results. Additionally, a review of historic maps and aerial photographs/imagery indicates that the API was historically utilized for farming, and several structures were built within the API in the early 1970s. Additionally, an agricultural ditch ("Maupin Ditch"), likely no longer extant, once overlapped the API.

The API has been historically used for agriculture. Although the structures and associated features once located within the API have been demolished, there may be associated subsurface historic-age features or deposits that remain. Given this potential for cultural resources within the API, it is recommended that a qualified archaeologist conduct cultural resources sensitivity training to the construction crew prior to the onset of Project-related ground-disturbing activities. While on-site for the cultural resources sensitivity training, it is recommended that the archaeologist investigate whether any trace of the historic-age Maupin Ditch remain within the API and if so, formally document this resource on the applicable Department of Parks and Recreation (DPR) 523 series forms, and assess its significance and eligibility for listing in the CRHR.

The discovery of human remains is always a potential during ground-disturbing activities. If human remains are discovered, a protocol defined by California state law (California Health & Safety Code 7050.5 and PRC 5097.98) is required to determine if the uncovered remains are modern or archaeological. If human remains are discovered, all work within a minimum of 200 feet must immediately stop and the county coroner must be contacted. Additionally, the City of Fresno must be contacted and notified of the discovery of human remains. If it is determined by the coroner that the human remains are of Native American origin, the coroner shall notify the NAHC, who shall then identify the most likely descendant (MLD). The MLD will be consulted to determine the best course of action for treatment and/or repatriation of the human remains, be granted access to examine the remains, and have 48 hours to provide recommendations. If the MLD does not make a recommendation within 48 hours of being given access to the human remains, the land manager can rebury the human remains in a location that will not be subject to future ground disturbing activities.

Should you have any questions or comments regarding this memo summary report, please do not hesitate to contact me at (909) 226-3802 or echandler@bargasconsulting.com.

Sincerely,



Evelyn N. Chandler
Director of Cultural Resources

Attachments

Attachment A Project Maps
Attachment B Correspondence with the NAHC

References Cited

Baloian, Randy
2009 Archaeological Survey Report: Willow Avenue Widening in the City of Fresno between Decatur and Perrin Avenues, Fresno County, California. Prepared by Applied Earthworks, Inc. Prepared for City of Fresno Public Works Department. On file at the SSJVIC. FR-02319.

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Hooper, S. and S. Flint
1999 Primary Record Update for P-10-003930 (CA-FRE-3109H). DPR series 523A (1/95) forms. On file at the SSJVIC.

Jones, Jessica
2018a Primary Record Update for P-10-003930 (CA-FRE-3109H). DPR series 523A (1/95) forms. On file at the SSJVIC.

2018b Linear Feature Record Update for P-10-003930 (CA-FRE-3109H). DPR series 523E (1/95) forms. On file at the SSJVIC.

Larson, Bryan and Cindy Toffelmier
2004 Primary Record Update for P-10-003930 (CA-FRE-3109H). DPR series 523A (1/95) forms. On file at the SSJVIC.

Morlet, Aubrie
2009 Historic Property Survey Report for Willow Avenue between Decatur and Perrin. Prepared by Applied Earthworks, Inc. Prepared for Caltrans District 6. On file at the SSJVIC. FR-02318.

Murphy, Peggy B.
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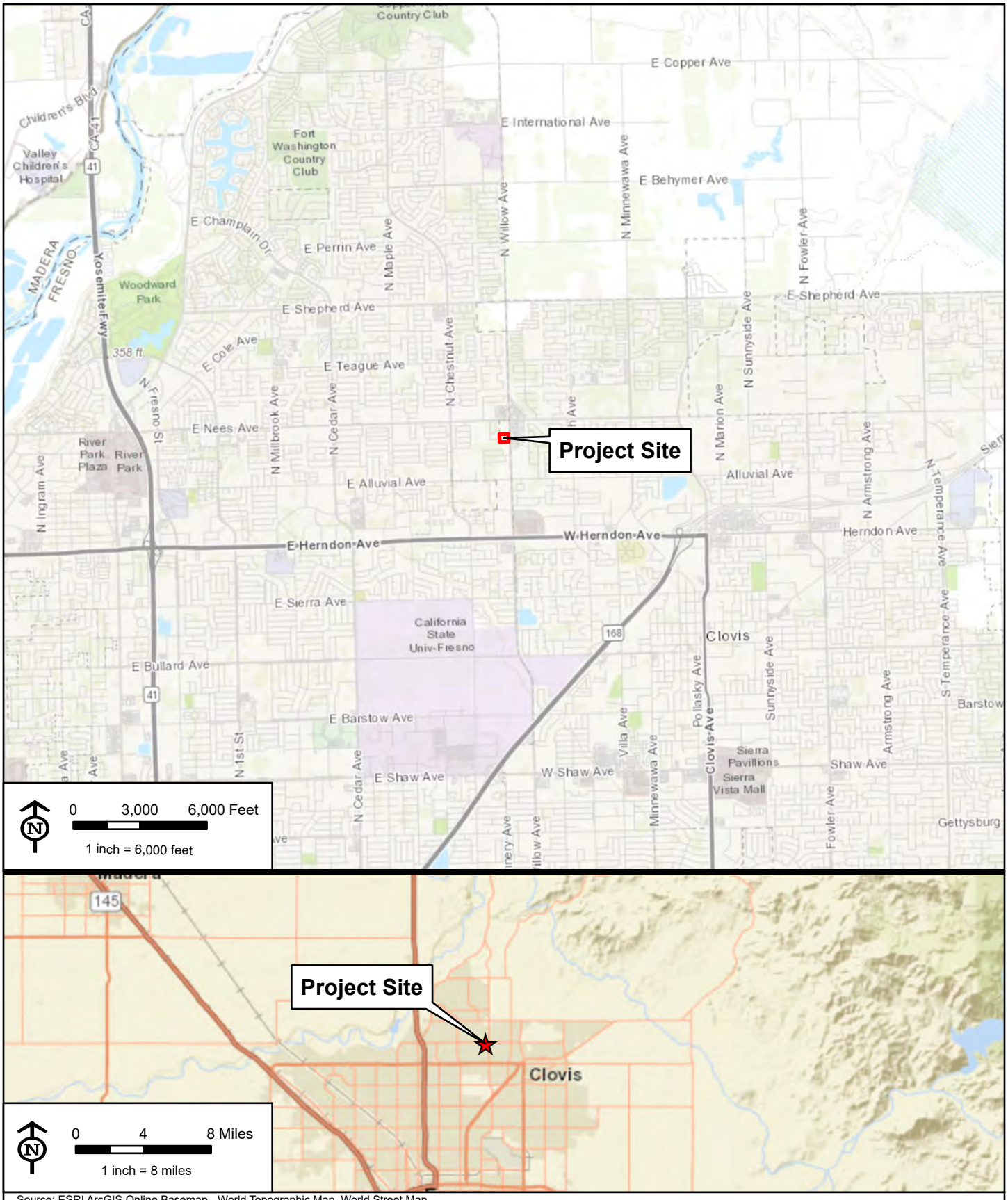
NETRonline
2022 *Historic Aerials Online* https://www.historicaerials.com/viewer.

Norton, W.L.
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Tibbet, J.
2016 Primary Record Update for P-10-003930 (CA-FRE-3109H). DPR series 523A (1/95) forms. On file at the SSJVIC.

Attachment A

Project Maps



Source: ESRI ArcGIS Online Basemap - World Topographic Map, World Street Map

Public Land Survey System (PLSS):
Mount Diablo Meridian,Township 12S, Range 20E, Section 36

USGS Quad(s): Clovis (1977)

Watershed: James Bypass (1803000907)

Project Site Coordinates: -119.731°W 36.85°N

BARGAS Environmental Consulting

Figure 1
Project Site and Vicinity Map

Willow Nees Commercial Project

Map Created: 8/16/2022, Map Revised: N/A, Bargas Project Number: 1445-21



Source: Bing Maps Hybrid

0 250 500 Feet

1 inch = 500 feet

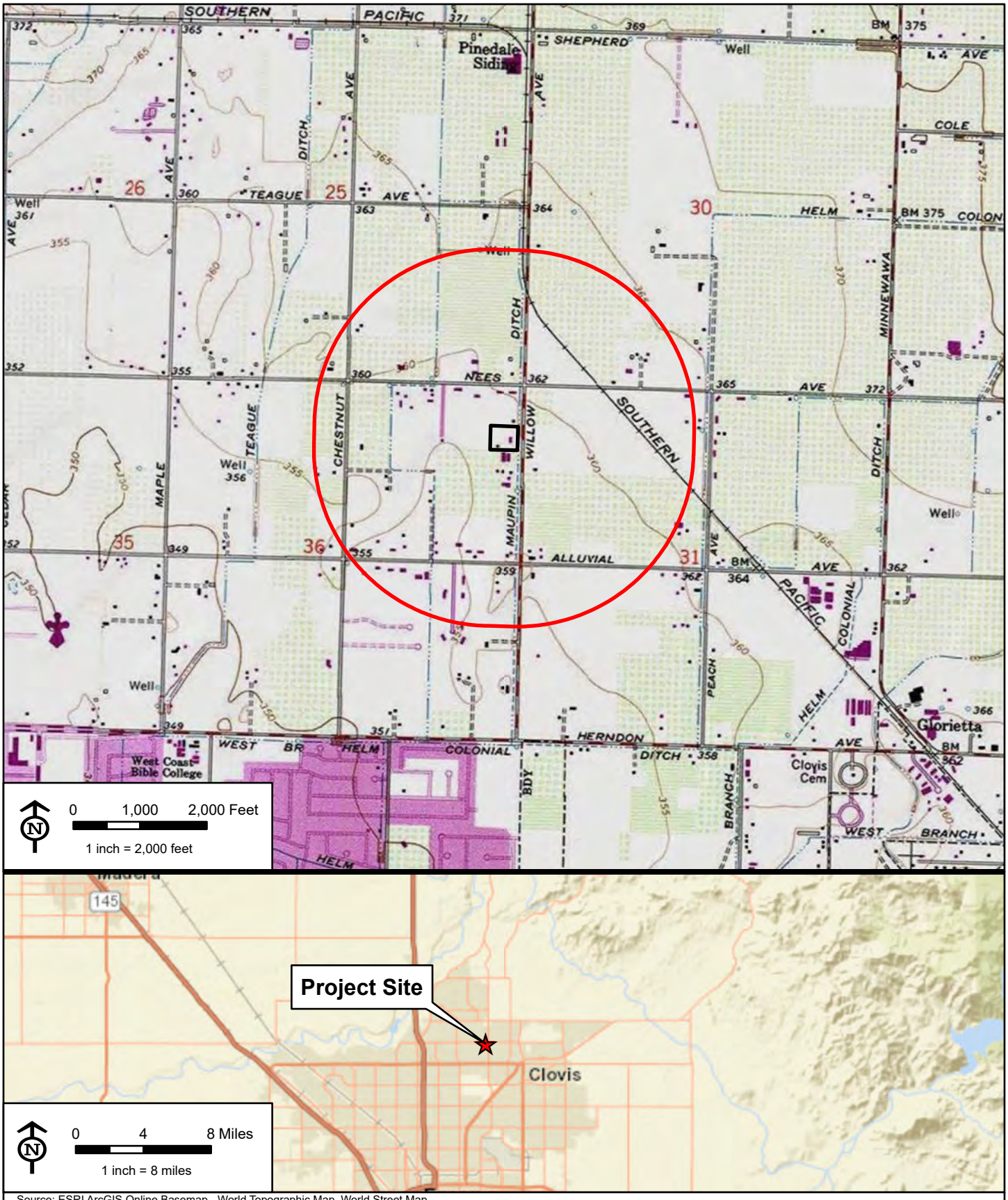
Area of Potential Impact

Figure 2
API Map

Willow Nees Commercial Project

BARGAS Environmental Consulting

Map Created: 8/16/2022, Map Revised: n/a, Bargas Project Number: 1445-21



Source: ESRI ArcGIS Online Basemap - World Topographic Map, World Street Map

Project Site

Record Search Boundary (0.5-mile)

Public Land Survey System (PLSS):
San Bernardino,Township 12S, Range 20E, Section 36
USGS Quad(s): Clovis (1978)
Project Site Coordinates: 11S 256537 4081703

BARGAS Environmental Consulting

Figure 3
Study Area Map

Willow Nees Commercial Project

Map Created: 8/29/2022, Map Revised: N/A, Bargas Project Number: 1445-21

Attachment B

Correspondence with the NAHC

Sacred Lands File & Native American Contacts List Request

Native American Heritage Commission
1550 Harbor Blvd, Suite 100
West Sacramento, CA 95691
916-373-3710
916-373-5471 – Fax
nahc@nahc.ca.gov

Information Below is Required for a Sacred Lands File Search

Project: Willow-Nees Commercial Project

County: Fresno

USGS Quadrangle Name: Clovis

Township: 12S **Range:** 20E **Section(s):** 36

Company/Firm/Agency: Bargas Environmental Consuting

Street Address: 3604 Fair Oaks Blvd #180

City: Sacramento **Zip:** 95864

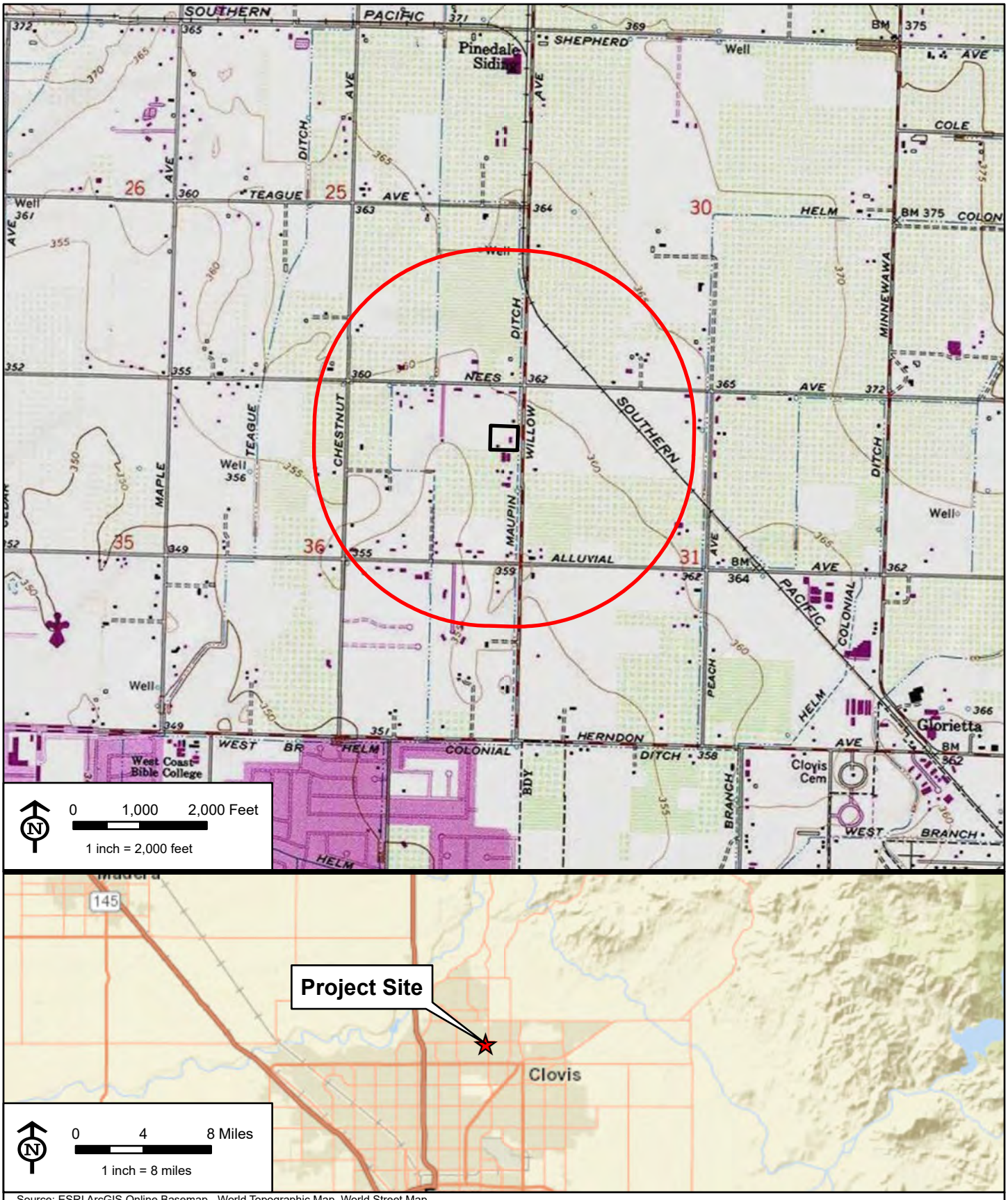
Phone: 510.589.0467

Fax:

Email: larias@bargasconsulting.com.

Project Description:

The project proposes to develop a 3.5-acre, single-story medical and professional office facilities consisting of two 9,550 square feet (sf) and one 11,400 sf buildings, parking, landscaping, and associated site improvements located at 7819 and 7835 North Willow Avenue. The project includes the demolition of two single-family residences and associated structures currently present on the Project site, removal of all landscaping, trees, and vegetation, removal of any residential utilities including any potential wells or septic systems, and construction of the aforementioned commercial facilities.



Source: ESRI ArcGIS Online Basemap - World Topographic Map, World Street Map

Project Site

Record Search Boundary (0.5-mile)

Public Land Survey System (PLSS):
San Bernardino,Township 12S, Range 20E, Section 36
USGS Quad(s): Clovis (1978)
Project Site Coordinates: 11S 256537 4081703

Record Search

Willow Nees Commercial Project

BARGAS Environmental Consulting

Map Created: 8/29/2022, Map Revised: N/A, Bargas Project Number: 1445-21

NATIVE AMERICAN HERITAGE COMMISSION

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NAHC HEADQUARTERS
1550 Harbor Boulevard
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West Sacramento,
California 95691
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nahc@nahc.ca.gov
NAHC.ca.gov

October 28, 2022

Lily Arias
Bargas Environmental Consulting

Via Email to: larias@bargasconsulting.com

Re: Willow-Nees Commercial Project, Fresno County

Dear Ms. Arias:

A record search of the Native American Heritage Commission (NAHC) Sacred Lands File (SLF) was completed for the information you have submitted for the above referenced project. The results were negative. However, the absence of specific site information in the SLF does not indicate the absence of cultural resources in any project area. Other sources of cultural resources should also be contacted for information regarding known and recorded sites.

Attached is a list of Native American tribes who may also have knowledge of cultural resources in the project area. This list should provide a starting place in locating areas of potential adverse impact within the proposed project area. I suggest you contact all of those indicated; if they cannot supply information, they might recommend others with specific knowledge. By contacting all those listed, your organization will be better able to respond to claims of failure to consult with the appropriate tribe. If a response has not been received within two weeks of notification, the Commission requests that you follow-up with a telephone call or email to ensure that the project information has been received.

If you receive notification of change of addresses and phone numbers from tribes, please notify me. With your assistance, we can assure that our lists contain current information.

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

Sincerely,

Cameron Vela

Cameron Vela
Cultural Resources Analyst

Attachment

Native American Heritage Commission
Native American Contact List
Fresno County
10/28/2022

Big Sandy Rancheria of Western Mono Indians
Elizabeth Kipp, Chairperson
P.O. Box 337
Auberry, CA, 93602
Phone: (559) 374 - 0066
Fax: (559) 374-0055
lkipp@bsrnation.com
Western Mono

Cold Springs Rancheria of Mono Indians
Carol Bill, Chairperson
P.O. Box 209
Tollhouse, CA, 93667
Phone: (559) 855 - 5043
Fax: (559) 855-4445
coldsprgstribe@netptc.net
Mono

Cold Springs Rancheria of Mono Indians
Jared Aldern,
P. O. Box 209
Tollhouse, CA, 93667
Phone: (559) 855 - 5043
Fax: (559) 855-4445
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This list is only applicable for contacting local Native Americans with regard to cultural resources assessment for the proposed Willow-Nees Commercial Project, Fresno County.

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ACOUSTICAL ANALYSIS

WILLOW & NEES COMMERCIAL OFFICE DEVELOPMENT
FRESNO, CALIFORNIA

WJVA Project No. 22-54

PREPARED FOR

BARGAS ENVIRONMENTAL CONSULTING
3604 FAIR OAKS BOULEVARD, SUITE 180
SACRAMENTO, CALIFORNIA 95864

PREPARED BY

WJV ACOUSTICS, INC.
VISALIA, CALIFORNIA

wjv acoustics

OCTOBER 26, 2022
(UPDATED JULY 6, 2023)

INTRODUCTION

The proposed project consists of the new development of two 11,160 square-foot and one 11,780 square-foot single-story medical and professional office facilities, to be located West of Willow Avenue and South of Nees Avenue, within the City of Fresno, California.

Planned tenant mix will potentially offer medical, dental, and other healthcare related uses in addition to professional office uses. The proposed project is designed to include 166 onsite standard and ADA parking stalls. Typical times of operation will likely take place during normal business hours/days. Future mix of tenants will determine daily employee count as well as customer/patient visits.

This analysis, prepared by WJV Acoustics, Inc. (WJVA), is based upon a project Conceptual Site Plan prepared by Legacy Realty & Development (dated 2-23-21), traffic data provided by the Fresno Council of Governments (Fresno COG) and the findings of on-site noise level measurements. Revisions to the site plan may affect the findings and recommendations of this report. The Conceptual Site Plan is provided as Figure 1.

Appendix A provides a description of the acoustical terminology used in this report. Unless otherwise stated, all sound levels reported are in A-weighted decibels (dB). A-weighting de-emphasizes the very low and very high frequencies of sound in a manner similar to the human ear. Most community noise standards utilize A-weighting, as it provides a high degree of correlation with human annoyance and health effects. Appendix B provides typical A-weighted sound levels for common noise sources.

NOISE EXPOSURE CRITERIA

The City of Fresno General Plan Noise Element (adopted 12-18-14) provides noise level criteria for land use compatibility for both transportation and non-transportation noise sources. The General Plan sets noise compatibility standards for transportation noise sources in terms of the Day-Night Average Level (L_{dn}). The L_{dn} represents the time-weighted energy average noise level for a 24-hour day, with a 10 dB penalty added to noise levels occurring during the nighttime hours (10:00 p.m.-7:00 a.m.). The L_{dn} represents cumulative exposure to noise over an extended period of time and are therefore calculated based upon *annual average* conditions. Table I provides the General Plan noise level standards for transportation noise sources.

TABLE I

CITY OF FRESNO GENERAL PLAN NOISE LEVEL STANDARDS
TRANSPORTATION (NON-AIRCRAFT) NOISE SOURCES

Noise-Sensitive Land Use	Outdoor Activity Areas[1]	Interior Spaces	
	L_{dn}/CNEL, dB	L_{dn}/CNEL, dB	L_{eq} 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 the 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: City of Fresno General Plan

The exterior noise level standards for residential land uses provided in Table I apply at the outdoor activity areas. Outdoor activity areas are generally considered backyards and balconies of single-family residential uses and individual yards, patios, balconies, and common use outdoor areas of multi-family residential uses. Common use outdoor activities include pools, children's play areas, and picnic and BBQ areas.

Additionally, Implementing Policy NS-1-h of the noise element requires that interior noise levels attributable to exterior transportation noise sources not exceed 45 dB L_{dn}. The intent of the interior noise level standard is to provide an acceptable noise environment for indoor communication and sleep.

The General Plan also establishes hourly acoustical performance standards for non-transportation (stationary) noise sources. The standards, provided in Table II, are made more restrictive during the nighttime hours of 10:00 p.m. to 7:00 a.m. For this project the applicable

noise level standard for the proposed use is an interior hourly noise level of 45 dB L_{eq}, as determined for a typical worst-case hour during periods of use.

TABLE II

CITY OF FRESNO GENERAL PLAN NOISE LEVEL STANDARDS
NON-TRANSPORTATION (STATIONARY) NOISE SOURCES

Daytime (7 a.m.-10 p.m.)		Nighttime (10 p.m.-7 a.m.)	
L_{eq}	L_{max}	L_{eq}	L_{max}
50	70	45	60

Source: City of Fresno Municipal Code

The above-described General Plan noise level standards for both transportation noise sources (Table I) and stationary noise sources (Table II) are consistent with the noise standards provided in Section 15.2506 of the Fresno Municipal Code. The Municipal Code also states *"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."*

PROJECT SITE NOISE EXPOSURE

The project site is located along the west side of N. Willow Avenue, approximately 600 feet south of W Nees Avenue, in Fresno, California. The project site is exposed traffic noise from N. Willow Avenue. The distance from the closest proposed office buildings to the centerline of N. Willow Avenue is approximately 165 feet (Building B and Building C).

Traffic Noise Exposure

Noise exposure from traffic on N. Willow Avenue was calculated for existing and future (2046) conditions using the FHWA Traffic Noise Model and traffic data obtained from Fresno COG and Caltrans and the findings of on-site noise level measurements. Noise exposure was calculated in terms of the both the CNEL noise metric (City of Fresno General Plan noise standards) and hourly worst-case (peak hour) energy average interior noise levels in terms of the L_{eq} metric (City of Fresno Municipal Code noise standards).

WJVA utilized the Federal Highway Administration (FHWA) Highway Traffic Noise Prediction Model (FHWA-RD-77-108). The FHWA Model is a standard analytical method used for roadway traffic noise calculations. The model is based upon reference energy emission levels for automobiles, medium trucks (2 axles) and heavy trucks (3 or more axles), with consideration given to vehicle volume, speed, roadway configuration, distance to the receiver, and the acoustical characteristics of the site. The FHWA Model was developed to predict hourly L_{eq} values for free-flowing traffic conditions, and is generally considered to be accurate within ±1.5 dB. To predict L_{dn} values, it is necessary to determine the hourly distribution of traffic for a typical day and adjust the traffic volume input data to yield an equivalent hourly traffic volume.

Noise level measurements and concurrent traffic counts were conducted by WJVA staff within the project site on October 18, 2022. The purpose of the measurement was to evaluate the accuracy of the FHWA Model in describing traffic noise exposure within the project site. The measurement site was located within the project site at a distance of approximately 150 feet from the centerline of N. Willow Avenue. The posted speed limit posted in the project vicinity was 50 mph (miles per hour). The project vicinity and noise monitoring site location are provided as Figure 2. A photograph showing the N. Willow Avenue noise measurement site is provided as Figure 3.

Noise monitoring equipment consisted of Larson-Davis Laboratories Model LDL-820 sound level analyzer equipped with a B&K Type 4176 1/2" microphone. The equipment complies with the specifications of the American National Standards Institute (ANSI) for Type I (Precision) sound level meters. The meter was calibrated in the field prior to use with a B&K Type 4230 acoustic calibrator to ensure the accuracy of the measurements. The microphone was located on a tripod at 5 feet above the ground.

Noise measurements were conducted in terms of the equivalent energy sound level (L_{eq}). Measured L_{eq} values were compared to L_{eq} values calculated (predicted) by the FHWA Model

using as inputs the traffic volumes, truck mix and vehicle speed observed during the noise measurements. The vehicle speed was assumed to be 50 mph. The results of the comparison are shown in Table V.

From Table V it may be determined that the traffic noise levels predicted by the FHWA Model were 4.5 dB higher than those measured for the conditions observed at the time of the noise measurements for N. Willow Avenue. This overprediction of the model is the result of actual traffic speeds in the project vicinity being well below the posted 50 mph speed limit. Many of the vehicles counted by WJVA staff were exiting retail center opposite the project site and speeds were relatively low as they entered onto N. Willow Avenue. Additionally, the signalized intersection on N. Willow Avenue and E. Nees Avenue regulates traffic speed in the project vicinity, as vehicles were often observed to be traveling at speeds well below the posted 50 mph speed limit as they approached a red light at the intersection or were departing the intersection. An adjustment to modeled noise levels, based upon this overprediction of the model is therefore warranted. A conservative offset of -3 dB was applied to project site noise exposure calculations.

TABLE V

COMPARISON OF MEASURED AND PREDICTED (FHWA MODEL) NOISE LEVELS WILLOW & NEES COMMERCIAL OFFICE DEVELOPMENT, FRESNO

	N. Willow Ave.
Measurement Start Time	10:45 a.m.
Observed # Autos/Hr.	1,680
Observed # Medium Trucks/Hr.	72
Observed # Heavy Trucks/Hr.	0
Observed Speed (MPH)	30
Distance, ft. (from center of roadway)	340
L_{eq}, dBA (Measured)	59.1
L_{eq}, dBA (Predicted)	63.6
Difference between Measured and Predicted L_{eq}, dBA	**-4.5**

Note: FHWA "soft" site assumed for calculations.
Source: WJV Acoustics, Inc.

Peak Hour Exterior Noise Exposure:

Peak hour traffic volume data for N. Willow Avenue in the project vicinity was obtained from Fresno COG. The daily traffic counts provided by Fresno COG indicate that the peak traffic volume hour (during proposed hours of operation) occurs between 4:00 p.m. and 5:00 p.m. Truck percentages were estimated by WJVA, based upon previous studies conducted in the project vicinity since project-specific data were not available from government sources. A speed limit of 50 mph was assumed for the roadway. Table VI summarizes peak hour traffic data used to model peak hour noise exposure within the project site.

TABLE VI

TRAFFIC NOISE MODELING ASSUMPTIONS
WILLOW & NEES COMMERCIAL OFFICE DEVELOPMENT, FRESNO

	N. Willow Avenue
Peak Hour Traffic Volume	2,132
Assumed Vehicle Speed (mph)	50
% Medium Trucks (% AADT)	2
% Heavy Trucks (% AADT)	1

Sources: Fresno COG
WJV Acoustics, Inc.

Using data from Table VI, the FHWA Model and the above-described -3 dB offset, peak hour traffic noise exposure was calculated to be approximately 61 dB L_{eq} at the closest proposed building setback to N. Willow Avenue.

Interior Noise Exposure:
The City of Fresno noise level standards applicable for office land uses is an hourly noise level standard of 45 dB L_{eq}. As described above, the exterior noise levels at the closest proposed building façade to the noise source (traffic along N. Willow Avenue) were calculated to be as follows:

- 61 dB L_{eq} (peak hour traffic)

This means that the proposed commercial construction must be capable of providing a minimum outdoor-to-indoor noise level reduction (NLR) of approximately 16 dB (61-45=16).

A specific analysis of interior noise levels was not performed. However, it may be assumed that commercial construction methods complying with current building code requirements will reduce exterior noise levels by approximately 25 dB (or more) if windows and doors are closed. This will be sufficient for compliance with the City's interior noise level standards within all rooms and all buildings. Requiring that it be possible for windows and doors to remain closed for sound insulation means that air conditioning or mechanical ventilation will be required.

CONCLUSIONS AND RECOMMENDATIONS

Interior Noise Compliance:

The City of Fresno noise level standard applicable for office land uses is an interior noise level of 45 dB L_{eq}, based upon peak hour noise exposure. Worst-case exterior noise levels were calculated to be approximately 61 dB L_{eq} (peak hour traffic). This means that the proposed commercial construction must be capable of providing a minimum outdoor-to-indoor noise level reduction (NLR) of approximately 16 dB (61-45=16).

It may be assumed that commercial construction methods complying with current building code requirements will reduce exterior noise levels by approximately 25 dB (or more) if windows and doors are closed. This will be sufficient for compliance with the City's interior noise level standards within all rooms and all buildings. Requiring that it be possible for windows and doors to remain closed for sound insulation means that air conditioning or mechanical ventilation will be required.

The conclusions and recommendations of this acoustical analysis are based upon the best information known to WJV Acoustics Inc. (WJVA) at the time the analysis was prepared concerning the proposed site plan, traffic volumes and roadway configurations. Any significant changes in these factors will require a reevaluation of the findings of this report. Additionally, any significant future changes in motor vehicle technology, noise regulations or other factors beyond WJVA's control may result in long-term noise results different from those described by this analysis.

Respectfully submitted,



Walter J. Van Groningen
President

WJV:wjv

FIGURE 1: SITE PLAN

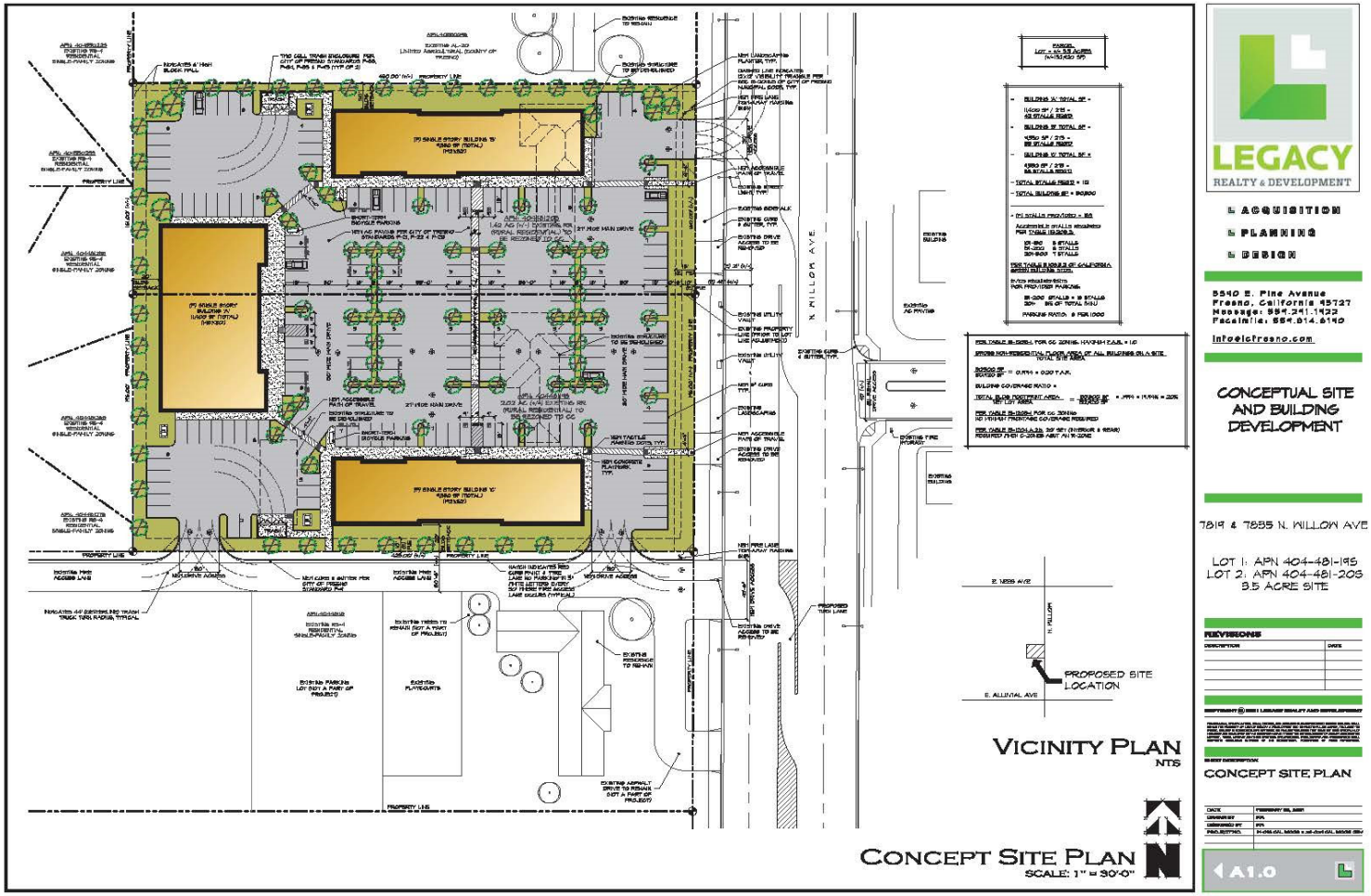


FIGURE 2: PROJECT SITE VICINITY AND NOISE MEASUREMENT LOCATION

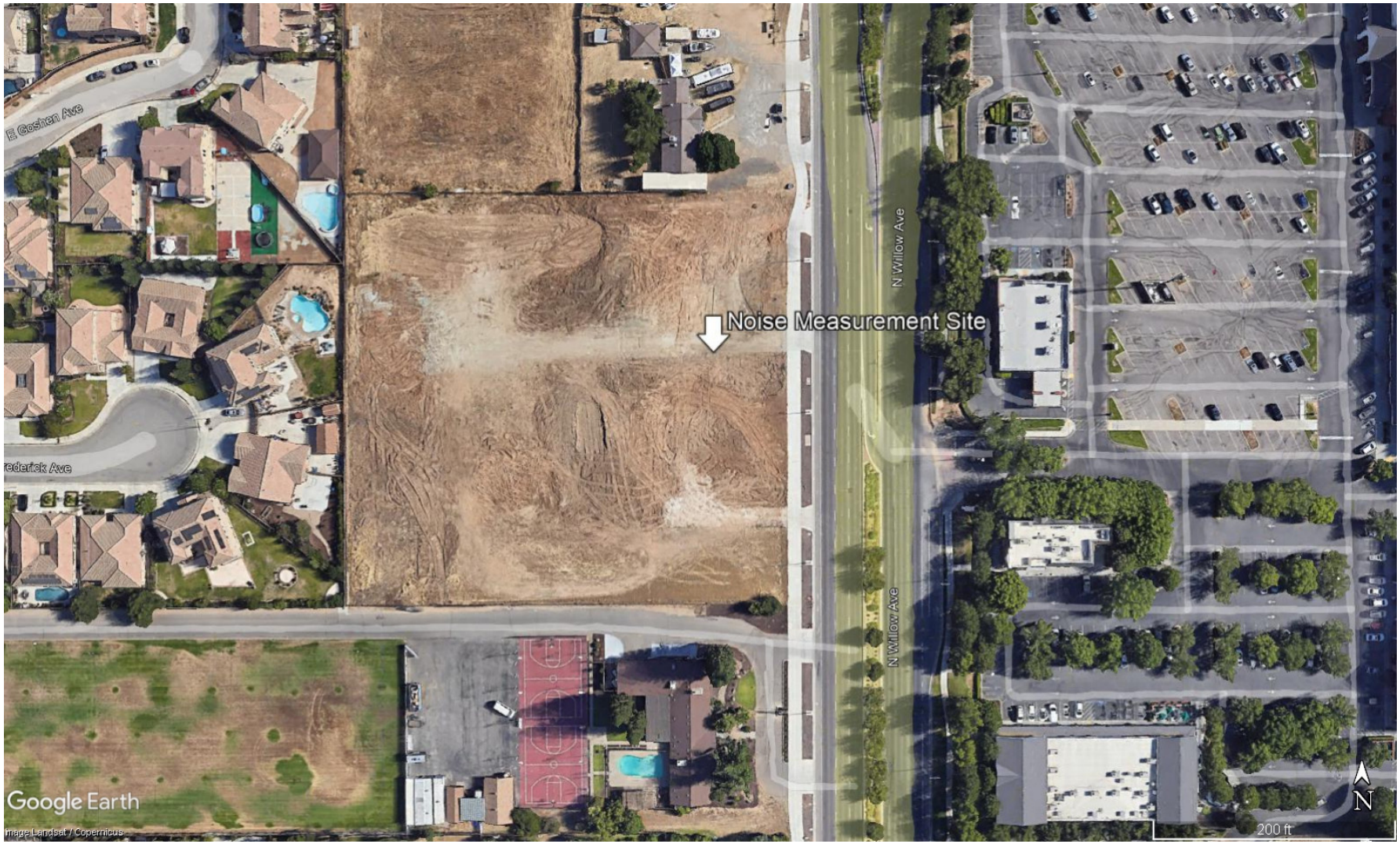


FIGURE 2: TRAFFIC NOISE MEASUREMENT LOCATION



APPENDIX A

ACOUSTICAL TERMINOLOGY

AMBIENT NOISE LEVEL: The composite of noise from all sources near and far. In this context, the ambient noise level constitutes the normal or existing level of environmental noise at a given location.

CNEL: Community Noise Equivalent Level. The average equivalent sound level during a 24-hour day, obtained after addition of approximately five decibels to sound levels in the evening from 7:00 p.m. to 10:00 p.m. and ten decibels to sound levels in the night before 7:00 a.m. and after 10:00 p.m.

DECIBEL, dB: A unit for describing the amplitude of sound, equal to 20 times the logarithm to the base 10 of the ratio of the pressure of the sound measured to the reference pressure, which is 20 micropascals (20 micronewtons per square meter).

DNL/L_{dn}: Day/Night Average Sound Level. The average equivalent sound level during a 24-hour day, obtained after addition of ten decibels to sound levels in the night after 10:00 p.m. and before 7:00 a.m.

L_{eq}: Equivalent Sound Level. The sound level containing the same total energy as a time varying signal over a given sample period. L_{eq} is typically computed over 1, 8 and 24-hour sample periods.

NOTE: The CNEL and DNL represent daily levels of noise exposure averaged on an annual basis, while L_{eq} represents the average noise exposure for a shorter time period, typically one hour.

L_{max}: The maximum noise level recorded during a noise event.

L_n: The sound level exceeded "n" percent of the time during a sample interval (L_{90}, L_{50}, L_{10}, etc.). For example, L_{10} equals the level exceeded 10 percent of the time.

A-2

ACOUSTICAL TERMINOLOGY

NOISE EXPOSURE CONTOURS: Lines drawn about a noise source indicating constant levels of noise exposure. CNEL and DNL contours are frequently utilized to describe community exposure to noise.

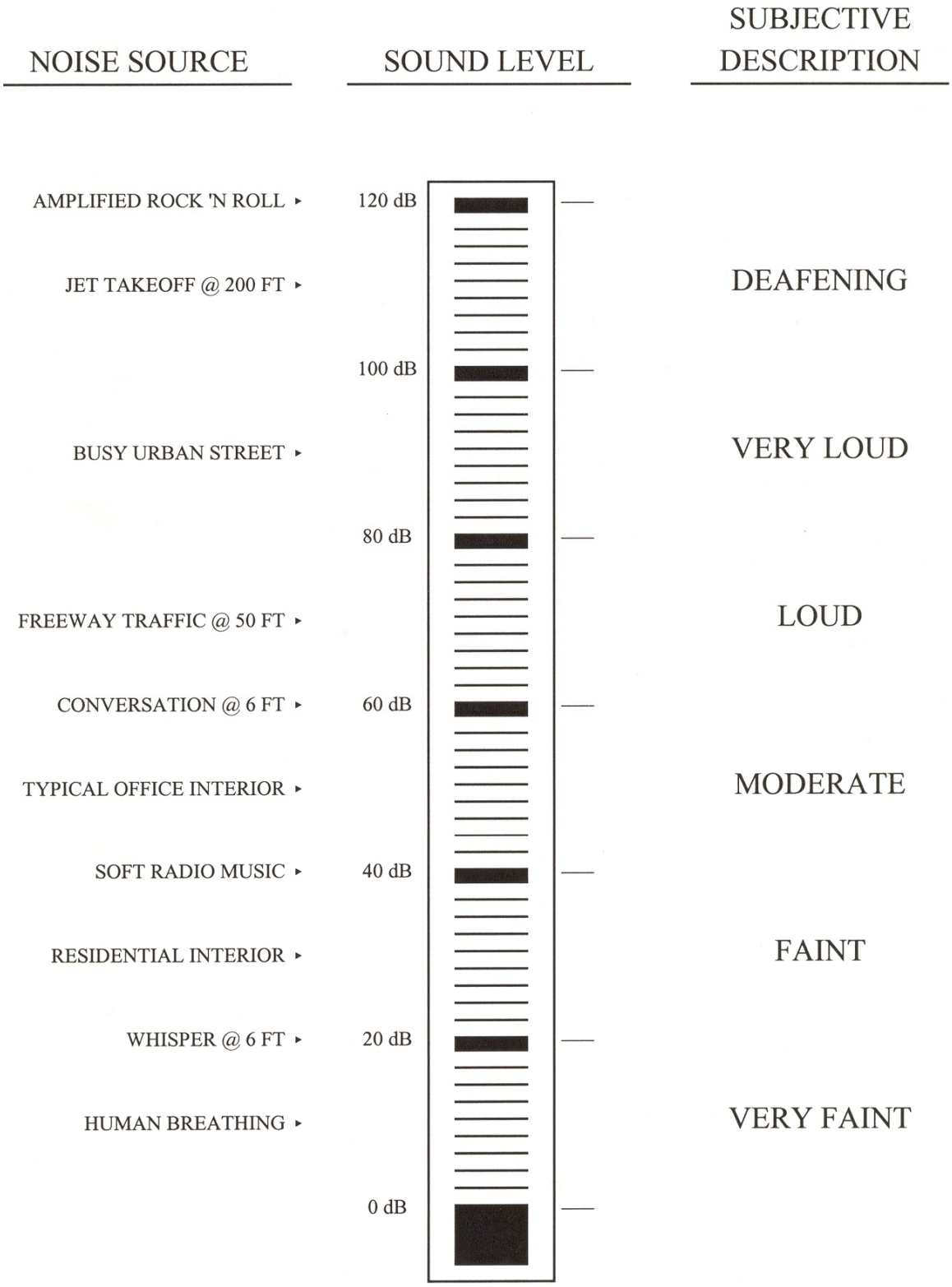
NOISE LEVEL REDUCTION (NLR): The noise reduction between indoor and outdoor environments or between two rooms that is the numerical difference, in decibels, of the average sound pressure levels in those areas or rooms. A measurement of "noise level reduction" combines the effect of the transmission loss performance of the structure plus the effect of acoustic absorption present in the receiving room.

SEL or SENEL: Sound Exposure Level or Single Event Noise Exposure Level. The level of noise accumulated during a single noise event, such as an aircraft overflight, with reference to a duration of one second. More specifically, it is the time-integrated A-weighted squared sound pressure for a stated time interval or event, based on a reference pressure of 20 micropascals and a reference duration of one second.

SOUND LEVEL: The sound pressure level in decibels as measured on a sound level meter using the A-weighting filter network. The A-weighting filter de-emphasizes the very low and very high frequency components of the sound in a manner similar to the response of the human ear and gives good correlation with subjective reactions to noise.

SOUND TRANSMISSION CLASS (STC): The single-number rating of sound transmission loss for a construction element (window, door, etc.) over a frequency range where speech intelligibility largely occurs.

APPENDIX B
EXAMPLES OF SOUND LEVELS



PETERS ENGINEERING GROUP
A CALIFORNIA CORPORATION

Mr. Patrick Sauls
Bargas Environmental Consulting
3604 Fair Oaks Boulevard, Suite 180
Sacramento, California 95864

July 19, 2023

Subject: Vehicle Miles Traveled Analysis
Proposed Medical and Professional Office Buildings
7819 and 7835 North Willow Avenue
Fresno, California

Dear Mr. Sauls:

Introduction

This report presents the results of vehicle miles traveled (VMT) analyses for the subject project.

Project Description

The proposed project site covers approximately 3.5 acres located at 7819 and 7835 North Willow Avenue in Fresno, California (APN 404-481-19S and 404-481-20S). A site plan is attached.

The proposed Project includes single-story medical and professional office facilities consisting of two 11,160-square-foot buildings and one 11,780-square-foot building, along with parking, landscaping, and associated site improvements. The planned tenant mix will potentially offer medical, dental, and other health-care-related uses in addition to professional office uses. Two single-family residences at the site were recently demolished. The site will be annexed to the City of Fresno and a General Plan amendment is not expected to be required. Site access will be via two driveways connecting to Willow Avenue and two driveways connecting to the alley south of the site. The connections to Willow Avenue are expected to be right-in/right-out only.

Trip Generation

Data provided in the Institute of Transportation Engineers (ITE) *Trip Generation Manual, 11th Edition* were used to estimate the number of trips anticipated to be generated by the project. Table 1 presents trip generation characteristics of the proposed project.

Table 1
Project Trip Generation

Land Use	Units	Weekday		A.M. Peak Hour					P.M. Peak Hour				
		Rate	Total	Rate	In:Out	In	Out	Total	Rate	In:Out	In	Out	Total
Medical-Dental Office Building – Stand Alone (720)	11,780 sq. ft.	36.00	424	3.10	79:21	29	8	37	3.93	30:70	14	33	47
General Office Building (710)	22,320 sq. ft.	10.84	242	1.52	88:12	30	4	34	1.44	17:83	6	27	33
Single-Family Detached Housing (210)	2 homes	9.43	-20	0.70	26:74	0	-2	-2	0.94	63:37	-2	0	-2
NET TOTAL:			**646**			**59**	**10**	**69**			**18**	**60**	**78**

Reference: *Trip Generation Manual, 11th Edition, Institute of Transportation Engineers 2021*
Rates are reported in trips per 1,000 square feet of building area for Land Uses 710 and 720.
Rates are reported in trips per dwelling unit for Land Use 210.

Vehicle Miles Traveled (VMT)

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

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

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

The City of Fresno adopted *CEQA Guidelines for Vehicle Miles Traveled Thresholds*, dated June 25, 2020, pursuant to SB 743 to be effective as of July 1, 2020. The thresholds described therein are referred to herein as the City of Fresno VMT Thresholds. The City of Fresno VMT Thresholds document was prepared and adopted consistent with the requirements of CEQA Guidelines Sections 15064.3 and 15064.7. The December 2018 Technical Advisory on Evaluating Transportation Impacts in CEQA (Technical Advisory)

published by the Governor's Office of Planning and Research (OPR) was utilized as a reference and guidance document in the preparation of the City of Fresno VMT Thresholds.

The City of Fresno VMT Thresholds adopted a screening standard and criteria that can be used to screen out qualified projects that meet the adopted criteria from a requirement to prepare a detailed VMT analysis.

The City of Fresno VMT Thresholds Section 3.0 regarding Project Screening discusses a variety of projects that may be screened out of a VMT analysis including specific development and transportation projects. For development projects, conditions may exist that would allow the presumption that a development project will have a less-than-significant impact. These conditions may be size, location, proximity to transit, or trip-making potential. For transportation projects, the primary attribute to consider with transportation projects is the potential to increase vehicle travel, sometimes referred to as "induced travel."

The proposed Project is located within a green area when plotted on Figure 7, City of Fresno - Existing VMT per Employee (attached), indicating that the Project is proposed within an area that is known to generate low VMT per employee. Therefore, no additional analyses are required and the lead agency may presume that the Project will create a less-than-significant transportation impact.

Thank you for the opportunity to perform this VMT analysis. Please feel free to contact our office if you have any questions.

PETERS ENGINEERING GROUP

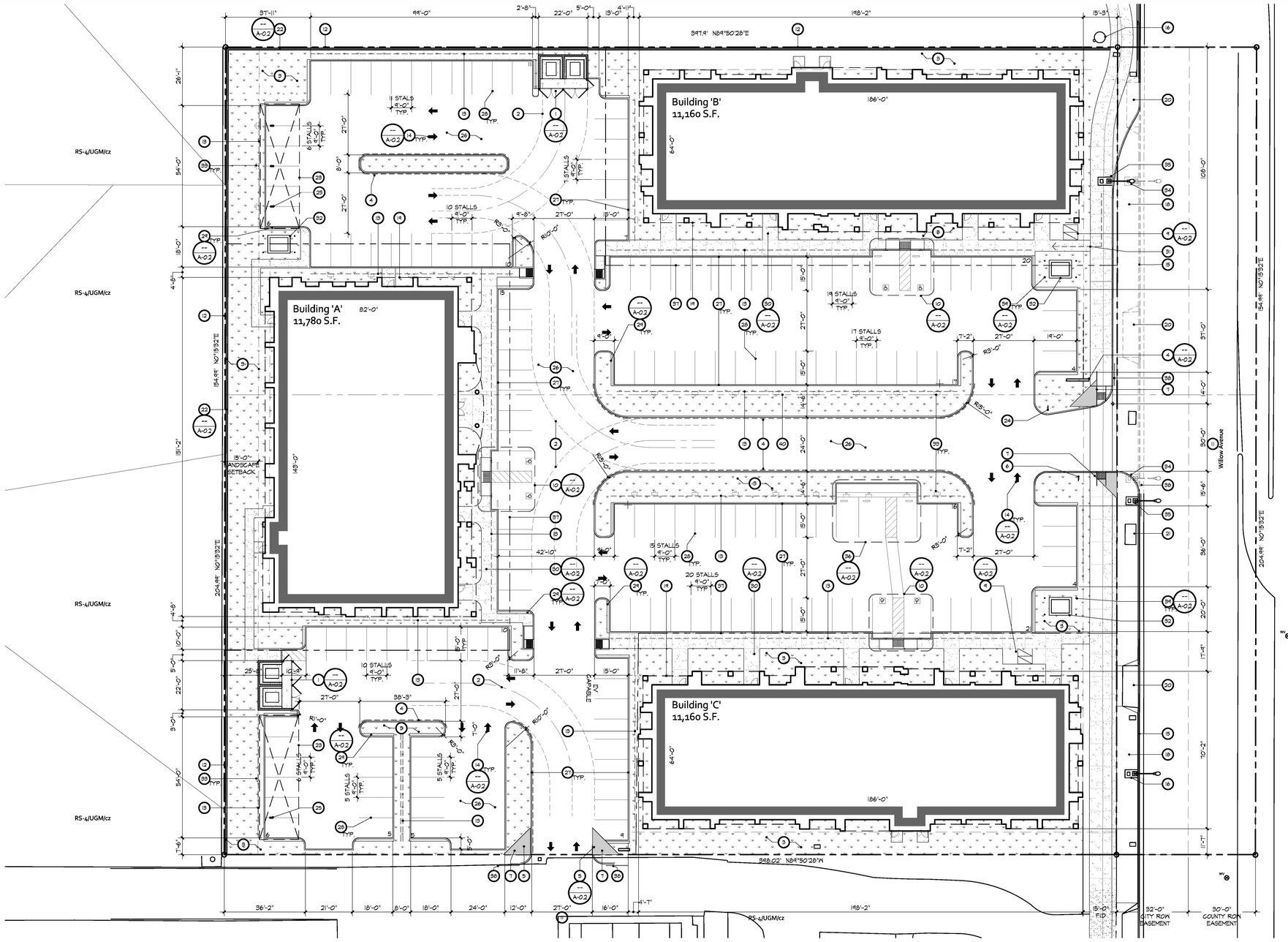
John Rowland, PE, TE



Attachment: Site Plan
Figure 7, City of Fresno - Existing VMT per Employee

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Site Plan



Keyed Site Plan Notes

1. NEW CMU TRASH / RECYCLING ENCLOSURE. INSTALL PER CITY STANDARD P-93B, P-34, AND REFER TO DETAILS FOR ADDITIONAL INFORMATION.
2. INDICATES 54'-0" OUTSIDE - 44'-0" CENTERLINE - 34'-0" INSIDE TURNING RADIUS FOR FIRE DEPARTMENT AND SANITATION VEHICLES.
3. NEW LANDSCAPE AREA. REFER TO LANDSCAPE AND IRRIGATION PLANS FOR ADDITIONAL INFORMATION.
4. DASHED LINE INDICATES LOCATION OF NEW FIRE LANE CURBS PAINTED RED W/ "NO PARKING - FIRE LANE" TEXT.
5. LOCATION OF NEW TOW-AWAY SIGNAGE REFER TO DETAIL FOR ADDITIONAL INFORMATION.
6. INSTALL 30" STATE STANDARD "STOP" SIGN AT LOCATION SHOWN. WHERE A "RIGHT TURN ONLY" SIGN IS REQUIRED AT THE SAME LOCATION, INSTALL A 30"X36" STATE STANDARD IMMEDIATELY BELOW THE STOP SIGN ON THE SAME POST. SIGN(S) SHALL BE MOUNTED ON A 2" GALVANIZED POST WITH THE BOTTOM OF THE LOWEST SIGN 7'-0" ABOVE GROUND, LOCATED BEHIND CURB AND IMMEDIATELY BEHIND A MAJOR STREET SIDEWALK.
7. 12'-0" VISIBILITY TRIANGLE.
8. DASHED LINE INDICATES CANOPY/ROOF OVERHANG.
9. NEW BICYCLE RACK AND LOCKERS. PROVIDE "DERO" RR2H STAINLESS STEEL SCHEDULE 10 SURFACE MOUNT 5 SPACE RACK AND MIN. 3 SPACE "HADRIAN" MAD LOCKER DIVIDED. REFER TO DETAILS 3 & 4/A-0.1 FOR ADDITIONAL INFORMATION. PROVIDE ARCHITECT WITH SHOP DRAWINGS AND COLOR SAMPLE FOR APPROVAL.
10. LOCATION OF NEW ACCESSIBLE PARKING STALLS. REFER TO DETAIL FOR ADDITIONAL INFORMATION.
11. NEW DRIVE APPROACH. INSTALL PER FW STD. P-2, P-6 & P-48. REFER TO CIVIL DRAWINGS FOR ADDITIONAL INFORMATION.
12. INDICATES EXISTING PROPERTY LINE.
13. 3 FT. VEHICLE OVERHANG. NO OBSTRUCTIONS ALLOWED WITHIN THIS BUFFER.
14. PAINTED DIRECTIONAL ARROW. COLOR TO BE TRAFFIC WHITE. REFER TO DETAIL FOR ADDITIONAL REQUIREMENTS.
15. EXISTING CONCRETE CURB & GUTTER SHALL CONFORM TO FW STD P-5. SIDE WALK TO HAVE 5% MAX. SLOPE IN DIRECTION OF TRAVEL AND 2% MAX. CROSS SLOPE.
16. INDICATES LOCATION OF EXISTING STREET LIGHT.
17. INDICATES LOCATION OF EXISTING WELL.
18. EXISTING CONCRETE CURB, GUTTER, AND SIDEWALK. SIDEWALK SHALL CONFORM TO FW STD P-5. SIDE WALK TO HAVE 5% MAX. SLOPE IN DIRECTION OF TRAVEL AND 2% MAX. CROSS SLOPE.
19. DASHED LINE REPRESENTS SOFFIT.
20. EXISTING DRIVE APPROACH TO BE REMOVED. REFER TO CIVIL DRAWING FOR ADDITIONAL INFORMATION.
21. EXISTING UTILITIES VAULT. REFER TO CIVIL PLANS FOR ADDITIONAL INFORMATION.
22. NEW 6'-0" HIGH CMU WALL.
23. INDICATES LOCATION OF NEW SOLAR SUPPORT CANOPY.
24. INDICATES MONUMENT SIGNAGE. SIGNAGE TO BE UNDER SEPARATE PERMIT.
25. INDICATES COLUMN FOR CANTILEVER SOLAR SUPPORT CANOPY SEE DETAIL FOR ADDITIONAL INFORMATION.
26. NEW A.C. PAVING. INSTALL PER PUBLIC WORKS STANDARD P-21, P-22 AND P-23. REFER TO CIVIL DRAWING FOR ADDITIONAL INFORMATION AND REQUIREMENTS.
27. LOCATION OF NEW 6" HIGH CONCRETE CURB - REFER TO CIVIL PLANS FOR ADDITIONAL INFORMATION.
28. NEW 4" WIDE PARKING STRIPE TO BE PAINTED TRAFFIC WHITE PER CITY STANDARDS.
29. INDICATES 12" CONCRETE CURB EXTENSION. REFER TO DETAIL FOR ADDITIONAL INFORMATION.
30. NEW CONCRETE FLATWORK. REFER TO DETAILS AND CIVIL DRAWINGS FOR ADDITIONAL INFORMATION.
31. ACCESSIBLE PATH OF TRAVEL FROM A PUBLIC WAY. WALKS TO HAVE A MAXIMUM OF 5% SLOPE AND 2% CROSS SLOPE - LANDINGS AT RAMPS TO BE 2% MAXIMUM FOR 48" MINIMUM BEYOND EDGE OF RAMP. 6'-0" AT OUTDOOR SEATING. REFER TO CIVIL PLANS FOR ADDITIONAL INFORMATION.
32. NEW PG&E PAD AND MOUNTED TRANSFORMER. REFER TO SITE UTILITY AND ELECTRICAL PLANS FOR ADDITIONAL INFORMATION.
33. INDICATES LOCATION OF REQUIRED EV AND EVCS CHARGING STATION EQUIPMENT. REFER TO ELECTRICAL DRAWINGS FOR ADDITIONAL INFORMATION.
34. DEMO AND RELOCATE EXISTING STREET LIGHT.
35. NEW LOCATION OF STREET LIGHT.
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37. INDICATES LOCATION OF EXISTING PARCEL LINE.
38. 3 COATS OF RED PAINT ON CURB FOR 10'-0". EACH SIDE OF DRIVEWAY.
39. INDICATES LOCATION OF BALLARD. REFER TO DETAIL FOR ADDITIONAL INFORMATION.
40. EXISTING PROPERTY LINE TO BE ADJUSTED PER CIVIL.

General Project Data

Legal Description

xxx

Rezoning Permit

xxx

Site Legend

- PROPERTY LINE
- (E) CURB AND GUTTER
- CENTER LINE
- P.U.E.
- PROPERTY CORNER
- (E) STREET LIGHT
- (N) STREET LIGHT
- (N) FIRE HYDRANT
- AC PAVING
- (P) CONCRETE SIDE WALK
- LANDSCAPING

Vicinity Map

City Use Only

Site Plan

iT ARCHITECTURE
1465 North Van Ness Avenue
Fresno, California 93728
559.442.4643 voice
559.485.9081 fax

Architect

Project
New Dental Office
7819 N. Willow Ave.
Fresno, California

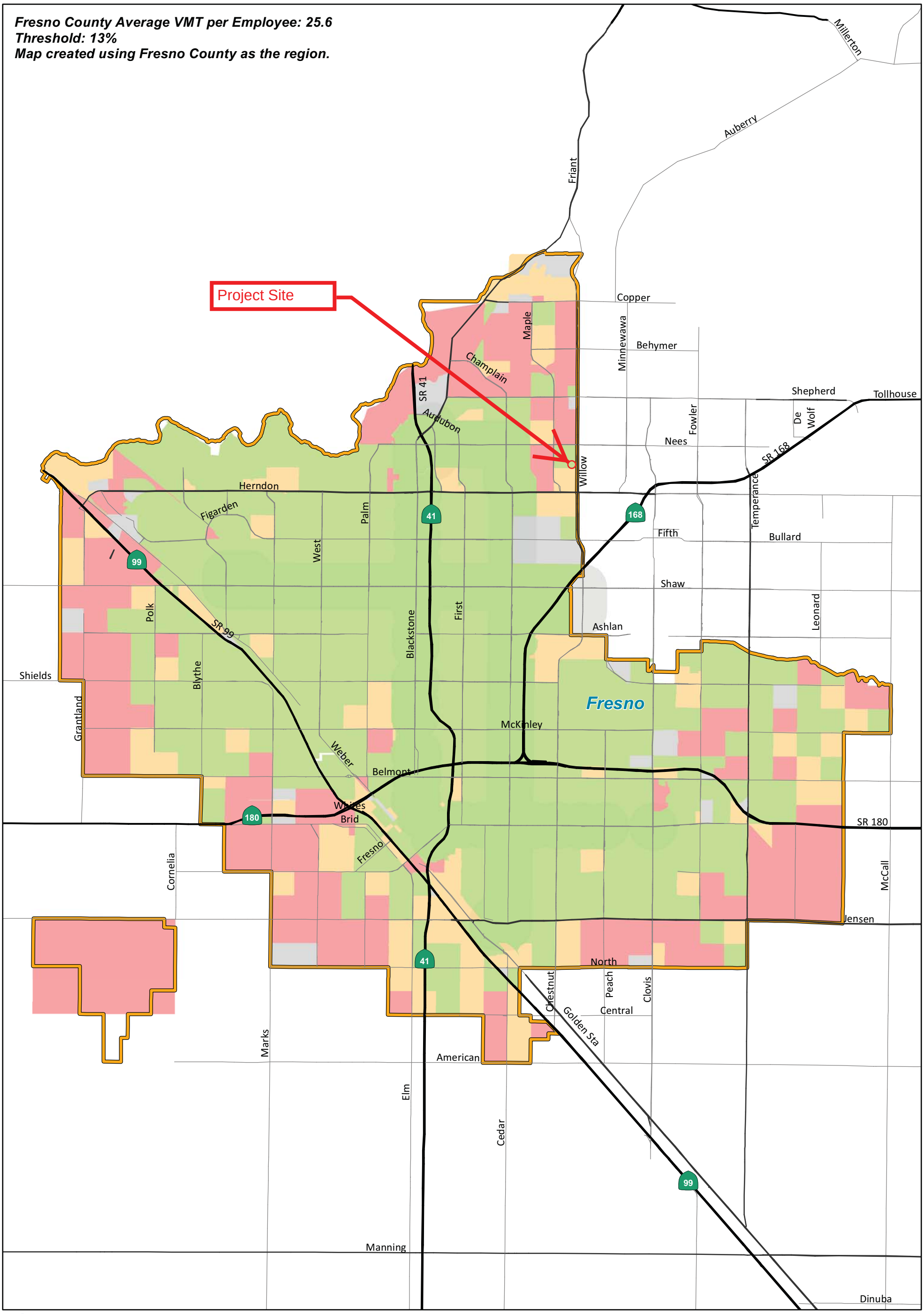
Owner
California Kidds Pediatric Dentistry
3875 W. Beechwood Ave.
Fresno, California 93722

Publishing Status
- Schematic
- Design Developm't.
- Site Plan Review
- Bidding
- Plan Check

Revisions

Scale: AS NOTED
Project Manager: IAN ROBERTSON
Project Number: 21-075
Sheet: A-0.0

Fresno County Average VMT per Employee: 25.6
Threshold: 13%
Map created using Fresno County as the region.



LSA

FIGURE 7

City with Sphere of Influence

VMT per Employee
- No Employee
- Less than 22.3
- 22.3 - 28.9
- Greater than 28.9

0 5000 10000
FEET

SOURCE: Fresno COG Activity Based Travel Demand Model (2019)

R:\FCG1901 FresnoCOG VMT\GIS\VMT_Maps_04-20-2020\fig6_Fresno_EMP.mxd (4/28/2020)

CEQA Guidelines for Vehicle Miles Traveled Thresholds

City of Fresno - Existing VMT per Employee

Willow/Nees Development Detailed Report

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1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	Willow/Nees Development
Construction Start Date	6/2/2025
Operational Year	2026
Lead Agency	—
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	2.70
Precipitation (days)	12.2
Location	7835 N Willow Ave, Clovis, CA 93611, USA
County	Fresno
City	Unincorporated
Air District	San Joaquin Valley APCD
Air Basin	San Joaquin Valley
TAZ	2432
EDFZ	5
Electric Utility	Pacific Gas & Electric Company
Gas Utility	Pacific Gas & Electric
App Version	2022.1.1.29

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
Medical Office Building	34.1	1000sqft	0.78	34,100	35,000	—	—	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

Sector	#	Measure Title
Construction	C-2*	Limit Heavy-Duty Diesel Vehicle Idling
Construction	C-4*	Use Local and Sustainable Building Materials
Construction	C-5	Use Advanced Engine Tiers
Construction	C-10-A	Water Exposed Surfaces
Construction	C-10-B	Water Active Demolition Sites
Construction	C-10-C	Water Unpaved Construction Roads
Construction	C-11	Limit Vehicle Speeds on Unpaved Roads
Construction	C-12	Sweep Paved Roads
Transportation	T-34*	Provide Bike Parking
Energy	E-1	Buildings Exceed 2019 Title 24 Building Envelope Energy Efficiency Standards
Energy	E-2	Require Energy Efficient Appliances
Energy	E-7*	Require Higher Efficacy Public Street and Area Lighting
Waste	S-1/S-2	Implement Waste Reduction Plan
Waste	S-4*	Recycle Demolished Construction Material
Refrigerants	R-5	Reduce Service Leak Emissions
Area Sources	AS-1	Use Low-VOC Cleaning Supplies
Area Sources	AS-2	Use Low-VOC Paints

* Qualitative or supporting measure. Emission reductions not included in the mitigated emissions results.

2. Emissions Summary

2.1. Construction Emissions Compared Against Thresholds

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

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	2.00	1.69	15.4	17.7	0.03	0.68	5.43	6.11	0.63	2.60	3.23	—	3,204	3,204	0.13	0.04	0.61	3,220
Mit.	0.37	0.37	1.64	18.6	0.03	0.06	2.19	2.25	0.06	1.03	1.09	—	3,204	3,204	0.13	0.04	0.61	3,220
% Reduced	81%	78%	89%	-5%	—	92%	60%	63%	91%	60%	66%	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	33.1	32.9	10.6	14.4	0.02	0.44	0.19	0.63	0.40	0.04	0.45	—	2,500	2,500	0.10	0.04	0.02	2,514
Mit.	32.2	32.1	3.58	15.6	0.02	0.09	0.19	0.27	0.08	0.04	0.13	—	2,500	2,500	0.10	0.04	0.02	2,514
% Reduced	3%	2%	66%	-9%	—	80%	—	56%	79%	—	71%	—	—	—	—	—	—	—
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.76	0.71	2.55	3.37	0.01	0.11	0.25	0.36	0.10	0.11	0.21	—	643	643	0.03	0.01	0.08	647
Mit.	0.52	0.51	0.40	3.80	0.01	0.01	0.12	0.13	0.01	0.05	0.06	—	643	643	0.03	0.01	0.08	647
% Reduced	32%	28%	84%	-13%	—	88%	53%	63%	87%	57%	71%	—	—	—	—	—	—	—
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.14	0.13	0.46	0.61	< 0.005	0.02	0.05	0.07	0.02	0.02	0.04	—	106	106	< 0.005	< 0.005	0.01	107
Mit.	0.09	0.09	0.07	0.69	< 0.005	< 0.005	0.02	0.02	< 0.005	0.01	0.01	—	106	106	< 0.005	< 0.005	0.01	107
% Reduced	32%	28%	84%	-13%	—	88%	53%	63%	87%	57%	71%	—	—	—	—	—	—	—

2.2. Construction Emissions by Year, Unmitigated

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

Year	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e

Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	2.00	1.69	15.4	17.7	0.03	0.68	5.43	6.11	0.63	2.60	3.23	—	3,204	3,204	0.13	0.04	0.61	3,220
2026	0.64	0.54	4.94	7.33	0.01	0.19	0.08	0.27	0.17	0.02	0.19	—	1,441	1,441	0.06	0.02	0.39	1,450
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	33.1	32.9	10.6	14.4	0.02	0.44	0.19	0.63	0.40	0.04	0.45	—	2,500	2,500	0.10	0.04	0.02	2,514
2026	0.63	0.54	4.96	7.26	0.01	0.19	0.08	0.27	0.17	0.02	0.19	—	1,434	1,434	0.06	0.02	0.01	1,443
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	0.76	0.71	2.55	3.37	0.01	0.11	0.25	0.36	0.10	0.11	0.21	—	643	643	0.03	0.01	0.08	647
2026	0.23	0.20	1.81	2.66	< 0.005	0.07	0.03	0.10	0.06	0.01	0.07	—	526	526	0.02	0.01	0.06	529
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	0.14	0.13	0.46	0.61	< 0.005	0.02	0.05	0.07	0.02	0.02	0.04	—	106	106	< 0.005	< 0.005	0.01	107
2026	0.04	0.04	0.33	0.49	< 0.005	0.01	0.01	0.02	0.01	< 0.005	0.01	—	87.0	87.0	< 0.005	< 0.005	0.01	87.6

2.3. Construction Emissions by Year, Mitigated

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

Year	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	0.37	0.37	1.64	18.6	0.03	0.06	2.19	2.25	0.06	1.03	1.09	—	3,204	3,204	0.13	0.04	0.61	3,220
2026	0.18	0.17	0.78	8.53	0.01	0.03	0.08	0.10	0.03	0.02	0.04	—	1,441	1,441	0.06	0.02	0.39	1,450
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	32.2	32.1	3.58	15.6	0.02	0.09	0.19	0.27	0.08	0.04	0.13	—	2,500	2,500	0.10	0.04	0.02	2,514
2026	0.17	0.17	0.79	8.46	0.01	0.03	0.08	0.10	0.03	0.02	0.04	—	1,434	1,434	0.06	0.02	0.01	1,443

Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	0.52	0.51	0.40	3.80	0.01	0.01	0.12	0.13	0.01	0.05	0.06	—	643	643	0.03	0.01	0.08	647
2026	0.06	0.06	0.29	3.10	< 0.005	0.01	0.03	0.04	0.01	0.01	0.02	—	526	526	0.02	0.01	0.06	529
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	0.09	0.09	0.07	0.69	< 0.005	< 0.005	0.02	0.02	< 0.005	0.01	0.01	—	106	106	< 0.005	< 0.005	0.01	107
2026	0.01	0.01	0.05	0.57	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	87.0	87.0	< 0.005	< 0.005	0.01	87.6

2.4. Operations Emissions Compared Against Thresholds

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

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	5.53	5.27	3.21	24.9	0.05	0.07	3.92	3.99	0.07	0.99	1.06	207	5,890	6,097	21.1	0.30	17.6	6,730
Mit.	5.47	5.21	3.17	24.9	0.05	0.07	3.92	3.98	0.06	0.99	1.06	107	5,808	5,915	11.1	0.30	17.6	6,300
% Reduced	1%	1%	1%	< 0.5%	—	5%	—	< 0.5%	5%	—	< 0.5%	48%	1%	3%	47%	—	< 0.5%	6%
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	4.77	4.51	3.60	21.8	0.05	0.07	3.92	3.98	0.06	0.99	1.06	207	5,479	5,686	21.1	0.32	1.30	6,310
Mit.	4.71	4.45	3.55	21.8	0.05	0.06	3.92	3.98	0.06	0.99	1.05	107	5,397	5,504	11.2	0.32	1.29	5,880
% Reduced	1%	1%	1%	< 0.5%	—	5%	—	< 0.5%	5%	—	< 0.5%	48%	2%	3%	47%	—	1%	7%
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	3.97	3.77	2.67	16.8	0.04	0.06	2.94	2.99	0.06	0.74	0.80	207	4,446	4,653	21.0	0.24	6.32	5,256
Mit.	3.91	3.71	2.62	16.7	0.04	0.06	2.94	2.99	0.05	0.74	0.80	107	4,363	4,471	11.1	0.24	6.31	4,826
% Reduced	1%	2%	2%	< 0.5%	—	5%	—	< 0.5%	6%	—	< 0.5%	48%	2%	4%	47%	—	< 0.5%	8%

Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.73	0.69	0.49	3.06	0.01	0.01	0.54	0.55	0.01	0.14	0.15	34.2	736	770	3.48	0.04	1.05	870
Mit.	0.71	0.68	0.48	3.06	0.01	0.01	0.54	0.55	0.01	0.14	0.15	17.8	722	740	1.83	0.04	1.04	799
% Reduced	1%	2%	2%	< 0.5%	1%	5%	—	< 0.5%	6%	—	< 0.5%	48%	2%	4%	47%	< 0.5%	< 0.5%	8%

2.5. Operations Emissions by Sector, Unmitigated

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

Sector	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	4.45	4.23	2.83	23.1	0.05	0.04	3.92	3.96	0.04	0.99	1.03	—	4,991	4,991	0.26	0.27	16.7	5,094
Area	1.04	1.02	0.01	1.48	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	6.10	6.10	< 0.005	< 0.005	—	6.12
Energy	0.04	0.02	0.37	0.31	< 0.005	0.03	—	0.03	0.03	—	0.03	—	883	883	0.11	0.01	—	889
Water	—	—	—	—	—	—	—	—	—	—	—	8.20	10.1	18.3	0.84	0.02	—	45.3
Waste	—	—	—	—	—	—	—	—	—	—	—	198	0.00	198	19.8	0.00	—	694
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.87	0.87
Total	5.53	5.27	3.21	24.9	0.05	0.07	3.92	3.99	0.07	0.99	1.06	207	5,890	6,097	21.1	0.30	17.6	6,730
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	3.96	3.71	3.23	21.5	0.04	0.04	3.92	3.96	0.04	0.99	1.03	—	4,586	4,586	0.31	0.29	0.43	4,681
Area	0.77	0.77	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Energy	0.04	0.02	0.37	0.31	< 0.005	0.03	—	0.03	0.03	—	0.03	—	883	883	0.11	0.01	—	889
Water	—	—	—	—	—	—	—	—	—	—	—	8.20	10.1	18.3	0.84	0.02	—	45.3
Waste	—	—	—	—	—	—	—	—	—	—	—	198	0.00	198	19.8	0.00	—	694
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.87	0.87
Total	4.77	4.51	3.60	21.8	0.05	0.07	3.92	3.98	0.06	0.99	1.06	207	5,479	5,686	21.1	0.32	1.30	6,310

Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	3.03	2.86	2.29	15.7	0.03	0.03	2.94	2.97	0.03	0.74	0.77	—	3,550	3,550	0.22	0.21	5.45	3,623
Area	0.90	0.89	0.01	0.73	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	3.01	3.01	< 0.005	< 0.005	—	3.02
Energy	0.04	0.02	0.37	0.31	< 0.005	0.03	—	0.03	0.03	—	0.03	—	883	883	0.11	0.01	—	889
Water	—	—	—	—	—	—	—	—	—	—	—	8.20	10.1	18.3	0.84	0.02	—	45.3
Waste	—	—	—	—	—	—	—	—	—	—	—	198	0.00	198	19.8	0.00	—	694
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.87	0.87
Total	3.97	3.77	2.67	16.8	0.04	0.06	2.94	2.99	0.06	0.74	0.80	207	4,446	4,653	21.0	0.24	6.32	5,256
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.55	0.52	0.42	2.87	0.01	0.01	0.54	0.54	0.01	0.14	0.14	—	588	588	0.04	0.03	0.90	600
Area	0.16	0.16	< 0.005	0.13	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.50	0.50	< 0.005	< 0.005	—	0.50
Energy	0.01	< 0.005	0.07	0.06	< 0.005	0.01	—	0.01	0.01	—	0.01	—	146	146	0.02	< 0.005	—	147
Water	—	—	—	—	—	—	—	—	—	—	—	1.36	1.67	3.02	0.14	< 0.005	—	7.51
Waste	—	—	—	—	—	—	—	—	—	—	—	32.9	0.00	32.9	3.28	0.00	—	115
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.14	0.14
Total	0.73	0.69	0.49	3.06	0.01	0.01	0.54	0.55	0.01	0.14	0.15	34.2	736	770	3.48	0.04	1.05	870

2.6. Operations Emissions by Sector, Mitigated

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

Sector	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	4.45	4.23	2.83	23.1	0.05	0.04	3.92	3.96	0.04	0.99	1.03	—	4,991	4,991	0.26	0.27	16.7	5,094
Area	0.98	0.96	0.01	1.48	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	6.10	6.10	< 0.005	< 0.005	—	6.12
Energy	0.04	0.02	0.32	0.27	< 0.005	0.02	—	0.02	0.02	—	0.02	—	801	801	0.10	0.01	—	806
Water	—	—	—	—	—	—	—	—	—	—	—	8.20	10.1	18.3	0.84	0.02	—	45.3
Waste	—	—	—	—	—	—	—	—	—	—	—	99.2	0.00	99.2	9.92	0.00	—	347

Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.86	0.86
Total	5.47	5.21	3.17	24.9	0.05	0.07	3.92	3.98	0.06	0.99	1.06	107	5,808	5,915	11.1	0.30	17.6	6,300
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	3.96	3.71	3.23	21.5	0.04	0.04	3.92	3.96	0.04	0.99	1.03	—	4,586	4,586	0.31	0.29	0.43	4,681
Area	0.72	0.72	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Energy	0.04	0.02	0.32	0.27	< 0.005	0.02	—	0.02	0.02	—	0.02	—	801	801	0.10	0.01	—	806
Water	—	—	—	—	—	—	—	—	—	—	—	8.20	10.1	18.3	0.84	0.02	—	45.3
Waste	—	—	—	—	—	—	—	—	—	—	—	99.2	0.00	99.2	9.92	0.00	—	347
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.86	0.86
Total	4.71	4.45	3.55	21.8	0.05	0.06	3.92	3.98	0.06	0.99	1.05	107	5,397	5,504	11.2	0.32	1.29	5,880
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	3.03	2.86	2.29	15.7	0.03	0.03	2.94	2.97	0.03	0.74	0.77	—	3,550	3,550	0.22	0.21	5.45	3,623
Area	0.85	0.84	0.01	0.73	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	3.01	3.01	< 0.005	< 0.005	—	3.02
Energy	0.04	0.02	0.32	0.27	< 0.005	0.02	—	0.02	0.02	—	0.02	—	801	801	0.10	0.01	—	806
Water	—	—	—	—	—	—	—	—	—	—	—	8.20	10.1	18.3	0.84	0.02	—	45.3
Waste	—	—	—	—	—	—	—	—	—	—	—	99.2	0.00	99.2	9.92	0.00	—	347
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.86	0.86
Total	3.91	3.71	2.62	16.7	0.04	0.06	2.94	2.99	0.05	0.74	0.80	107	4,363	4,471	11.1	0.24	6.31	4,826
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.55	0.52	0.42	2.87	0.01	0.01	0.54	0.54	0.01	0.14	0.14	—	588	588	0.04	0.03	0.90	600
Area	0.15	0.15	< 0.005	0.13	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.50	0.50	< 0.005	< 0.005	—	0.50
Energy	0.01	< 0.005	0.06	0.05	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	133	133	0.02	< 0.005	—	133
Water	—	—	—	—	—	—	—	—	—	—	—	1.36	1.67	3.02	0.14	< 0.005	—	7.51
Waste	—	—	—	—	—	—	—	—	—	—	—	16.4	0.00	16.4	1.64	0.00	—	57.5
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.14	0.14
Total	0.71	0.68	0.48	3.06	0.01	0.01	0.54	0.55	0.01	0.14	0.15	17.8	722	740	1.83	0.04	1.04	799

3. Construction Emissions Details

3.1. Grading (2025) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.29	1.09	10.1	10.0	0.02	0.46	—	0.46	0.43	—	0.43	—	1,714	1,714	0.07	0.01	—	1,720
Dust From Material Movement	—	—	—	—	—	—	5.31	5.31	—	2.57	2.57	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.05	0.04	0.41	0.41	< 0.005	0.02	—	0.02	0.02	—	0.02	—	70.4	70.4	< 0.005	< 0.005	—	70.7
Dust From Material Movement	—	—	—	—	—	—	0.22	0.22	—	0.11	0.11	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Roa Equipment	0.01	0.01	0.08	0.08	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	11.7	11.7	< 0.005	< 0.005	—	11.7
Dust From Material Movement	—	—	—	—	—	—	0.04	0.04	—	0.02	0.02	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.03	0.02	0.28	0.00	0.00	0.04	0.04	0.00	0.01	0.01	—	45.5	45.5	< 0.005	< 0.005	0.17	46.2
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.72	1.72	< 0.005	< 0.005	< 0.005	1.75
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.28	0.28	< 0.005	< 0.005	< 0.005	0.29
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.2. Grading (2025) - Mitigated

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

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

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.16	0.16	0.84	9.79	0.02	0.03	—	0.03	0.03	—	0.03	—	1,714	1,714	0.07	0.01	—	1,720
Dust From Material Movement	—	—	—	—	—	—	2.07	2.07	—	1.00	1.00	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.03	0.40	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	70.4	70.4	< 0.005	< 0.005	—	70.7
Dust From Material Movement	—	—	—	—	—	—	0.09	0.09	—	0.04	0.04	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.01	0.07	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	11.7	11.7	< 0.005	< 0.005	—	11.7
Dust From Material Movement	—	—	—	—	—	—	0.02	0.02	—	0.01	0.01	—	—	—	—	—	—	—

Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.03	0.02	0.28	0.00	0.00	0.04	0.04	0.00	0.01	0.01	—	45.5	45.5	< 0.005	< 0.005	0.17	46.2
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.72	1.72	< 0.005	< 0.005	< 0.005	1.75
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.28	0.28	< 0.005	< 0.005	< 0.005	0.29
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.3. Building Construction (2025) - Unmitigated

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

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

Off-Road Equipment	0.62	0.52	5.14	6.94	0.01	0.22	—	0.22	0.20	—	0.20	—	1,305	1,305	0.05	0.01	—	1,309
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.62	0.52	5.14	6.94	0.01	0.22	—	0.22	0.20	—	0.20	—	1,305	1,305	0.05	0.01	—	1,309
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.23	0.20	1.94	2.62	< 0.005	0.08	—	0.08	0.08	—	0.08	—	493	493	0.02	< 0.005	—	494
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.04	0.04	0.35	0.48	< 0.005	0.02	—	0.02	0.01	—	0.01	—	81.6	81.6	< 0.005	< 0.005	—	81.9
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.05	0.05	0.02	0.41	0.00	0.00	0.06	0.06	0.00	0.01	0.01	—	66.2	66.2	< 0.005	< 0.005	0.25	67.3
Vendor	0.01	< 0.005	0.12	0.05	< 0.005	< 0.005	0.02	0.02	< 0.005	0.01	0.01	—	73.5	73.5	< 0.005	0.01	0.19	77.0

Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.04	0.04	0.03	0.33	0.00	0.00	0.06	0.06	0.00	0.01	0.01	—	58.7	58.7	< 0.005	< 0.005	0.01	59.6
Vendor	0.01	< 0.005	0.13	0.05	< 0.005	< 0.005	0.02	0.02	< 0.005	0.01	0.01	—	73.7	73.7	< 0.005	0.01	< 0.005	76.9
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.02	0.01	0.13	0.00	0.00	0.02	0.02	0.00	0.01	0.01	—	23.0	23.0	< 0.005	< 0.005	0.04	23.3
Vendor	< 0.005	< 0.005	0.05	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	27.8	27.8	< 0.005	< 0.005	0.03	29.1
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	3.80	3.80	< 0.005	< 0.005	0.01	3.87
Vendor	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	4.60	4.60	< 0.005	< 0.005	0.01	4.81
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.4. Building Construction (2025) - Mitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.12	0.12	0.64	8.10	0.01	0.02	—	0.02	0.02	—	0.02	—	1,305	1,305	0.05	0.01	—	1,309
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.12	0.12	0.64	8.10	0.01	0.02	—	0.02	0.02	—	0.02	—	1,305	1,305	0.05	0.01	—	1,309
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.05	0.05	0.24	3.06	< 0.005	0.01	—	0.01	0.01	—	0.01	—	493	493	0.02	< 0.005	—	494
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.04	0.56	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	81.6	81.6	< 0.005	< 0.005	—	81.9
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.05	0.05	0.02	0.41	0.00	0.00	0.06	0.06	0.00	0.01	0.01	—	66.2	66.2	< 0.005	< 0.005	0.25	67.3
Vendor	0.01	< 0.005	0.12	0.05	< 0.005	< 0.005	0.02	0.02	< 0.005	0.01	0.01	—	73.5	73.5	< 0.005	0.01	0.19	77.0
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.04	0.04	0.03	0.33	0.00	0.00	0.06	0.06	0.00	0.01	0.01	—	58.7	58.7	< 0.005	< 0.005	0.01	59.6

Vendor	0.01	< 0.005	0.13	0.05	< 0.005	< 0.005	0.02	0.02	< 0.005	0.01	0.01	—	73.7	73.7	< 0.005	0.01	< 0.005	76.9
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.02	0.01	0.13	0.00	0.00	0.02	0.02	0.00	0.01	0.01	—	23.0	23.0	< 0.005	< 0.005	0.04	23.3
Vendor	< 0.005	< 0.005	0.05	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	27.8	27.8	< 0.005	< 0.005	0.03	29.1
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	3.80	3.80	< 0.005	< 0.005	0.01	3.87
Vendor	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	4.60	4.60	< 0.005	< 0.005	0.01	4.81
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.5. Building Construction (2026) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.59	0.49	4.81	6.91	0.01	0.19	—	0.19	0.17	—	0.17	—	1,304	1,304	0.05	0.01	—	1,309
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.59	0.49	4.81	6.91	0.01	0.19	—	0.19	0.17	—	0.17	—	1,304	1,304	0.05	0.01	—	1,309

Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.22	0.18	1.76	2.53	< 0.005	0.07	—	0.07	0.06	—	0.06	—	477	477	0.02	< 0.005	—	479
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.04	0.03	0.32	0.46	< 0.005	0.01	—	0.01	0.01	—	0.01	—	79.0	79.0	< 0.005	< 0.005	—	79.3
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.05	0.04	0.02	0.37	0.00	0.00	0.06	0.06	0.00	0.01	0.01	—	64.8	64.8	< 0.005	< 0.005	0.22	65.9
Vendor	0.01	< 0.005	0.11	0.05	< 0.005	< 0.005	0.02	0.02	< 0.005	0.01	0.01	—	72.1	72.1	< 0.005	0.01	0.17	75.6
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.04	0.04	0.03	0.30	0.00	0.00	0.06	0.06	0.00	0.01	0.01	—	57.5	57.5	< 0.005	< 0.005	0.01	58.4
Vendor	0.01	< 0.005	0.12	0.05	< 0.005	< 0.005	0.02	0.02	< 0.005	0.01	0.01	—	72.3	72.3	< 0.005	0.01	< 0.005	75.6
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.01	0.01	0.11	0.00	0.00	0.02	0.02	0.00	0.01	0.01	—	21.8	21.8	< 0.005	< 0.005	0.04	22.2
Vendor	< 0.005	< 0.005	0.04	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	26.4	26.4	< 0.005	< 0.005	0.03	27.6

Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	3.61	3.61	< 0.005	< 0.005	0.01	3.67
Vendor	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	4.37	4.37	< 0.005	< 0.005	< 0.005	4.58
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.6. Building Construction (2026) - Mitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.12	0.12	0.64	8.10	0.01	0.02	—	0.02	0.02	—	0.02	—	1,304	1,304	0.05	0.01	—	1,309
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.12	0.12	0.64	8.10	0.01	0.02	—	0.02	0.02	—	0.02	—	1,304	1,304	0.05	0.01	—	1,309
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.05	0.05	0.23	2.96	< 0.005	0.01	—	0.01	0.01	—	0.01	—	477	477	0.02	< 0.005	—	479

Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.04	0.54	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	79.0	79.0	< 0.005	< 0.005	—	79.3
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.05	0.04	0.02	0.37	0.00	0.00	0.06	0.06	0.00	0.01	0.01	—	64.8	64.8	< 0.005	< 0.005	0.22	65.9
Vendor	0.01	< 0.005	0.11	0.05	< 0.005	< 0.005	0.02	0.02	< 0.005	0.01	0.01	—	72.1	72.1	< 0.005	0.01	0.17	75.6
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.04	0.04	0.03	0.30	0.00	0.00	0.06	0.06	0.00	0.01	0.01	—	57.5	57.5	< 0.005	< 0.005	0.01	58.4
Vendor	0.01	< 0.005	0.12	0.05	< 0.005	< 0.005	0.02	0.02	< 0.005	0.01	0.01	—	72.3	72.3	< 0.005	0.01	< 0.005	75.6
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.01	0.01	0.11	0.00	0.00	0.02	0.02	0.00	0.01	0.01	—	21.8	21.8	< 0.005	< 0.005	0.04	22.2
Vendor	< 0.005	< 0.005	0.04	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	26.4	26.4	< 0.005	< 0.005	0.03	27.6
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	3.61	3.61	< 0.005	< 0.005	0.01	3.67
Vendor	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	4.37	4.37	< 0.005	< 0.005	< 0.005	4.58
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.7. Paving (2025) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.61	0.51	4.37	5.31	0.01	0.19	—	0.19	0.18	—	0.18	—	823	823	0.03	0.01	—	826
Paving	0.00	0.00	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.01	0.12	0.15	< 0.005	0.01	—	0.01	< 0.005	—	< 0.005	—	22.6	22.6	< 0.005	< 0.005	—	22.6
Paving	0.00	0.00	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.02	0.03	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	3.74	3.74	< 0.005	< 0.005	—	3.75
Paving	0.00	0.00	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.07	0.05	0.53	0.00	0.00	0.10	0.10	0.00	0.02	0.02	—	94.2	94.2	< 0.005	< 0.005	0.01	95.6
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	2.67	2.67	< 0.005	< 0.005	< 0.005	2.72
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.44	0.44	< 0.005	< 0.005	< 0.005	0.45
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.8. Paving (2025) - Mitigated

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

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

Off-Road Equipm	0.27	0.23	2.09	5.55	0.01	0.06	—	0.06	0.06	—	0.06	—	823	823	0.03	0.01	—	826
Paving	0.00	0.00	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.06	0.15	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	22.6	22.6	< 0.005	< 0.005	—	22.6
Paving	0.00	0.00	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.01	0.03	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	3.74	3.74	< 0.005	< 0.005	—	3.75
Paving	0.00	0.00	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.07	0.05	0.53	0.00	0.00	0.10	0.10	0.00	0.02	0.02	—	94.2	94.2	< 0.005	< 0.005	0.01	95.6
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	2.67	2.67	< 0.005	< 0.005	< 0.005	2.72
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.44	0.44	< 0.005	< 0.005	< 0.005	0.45
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.9. Architectural Coating (2025) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.15	0.13	0.88	1.14	< 0.005	0.03	—	0.03	0.03	—	0.03	—	134	134	0.01	< 0.005	—	134
Architectural Coatings	31.6	31.6	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.01	0.02	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.83	1.83	< 0.005	< 0.005	—	1.84

Architect Coatings	0.43	0.43	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.30	0.30	< 0.005	< 0.005	—	0.30
Architectural Coatings	0.08	0.08	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.07	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	11.7	11.7	< 0.005	< 0.005	< 0.005	11.9
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.17	0.17	< 0.005	< 0.005	< 0.005	0.17
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.03	0.03	< 0.005	< 0.005	< 0.005	0.03
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.10. Architectural Coating (2025) - Mitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.02	0.65	0.96	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	134	134	0.01	< 0.005	—	134
Architectural Coatings	31.6	31.6	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.83	1.83	< 0.005	< 0.005	—	1.84
Architectural Coatings	0.43	0.43	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.30	0.30	< 0.005	< 0.005	—	0.30
Architectural Coatings	0.08	0.08	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.07	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	11.7	11.7	< 0.005	< 0.005	< 0.005	11.9
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.17	0.17	< 0.005	< 0.005	< 0.005	0.17
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.03	0.03	< 0.005	< 0.005	< 0.005	0.03
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	4.45	4.23	2.83	23.1	0.05	0.04	3.92	3.96	0.04	0.99	1.03	—	4,991	4,991	0.26	0.27	16.7	5,094
Total	4.45	4.23	2.83	23.1	0.05	0.04	3.92	3.96	0.04	0.99	1.03	—	4,991	4,991	0.26	0.27	16.7	5,094
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	3.96	3.71	3.23	21.5	0.04	0.04	3.92	3.96	0.04	0.99	1.03	—	4,586	4,586	0.31	0.29	0.43	4,681
Total	3.96	3.71	3.23	21.5	0.04	0.04	3.92	3.96	0.04	0.99	1.03	—	4,586	4,586	0.31	0.29	0.43	4,681
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	0.55	0.52	0.42	2.87	0.01	0.01	0.54	0.54	0.01	0.14	0.14	—	588	588	0.04	0.03	0.90	600
Total	0.55	0.52	0.42	2.87	0.01	0.01	0.54	0.54	0.01	0.14	0.14	—	588	588	0.04	0.03	0.90	600

4.1.2. Mitigated

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

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

Medical Office Building	4.45	4.23	2.83	23.1	0.05	0.04	3.92	3.96	0.04	0.99	1.03	—	4,991	4,991	0.26	0.27	16.7	5,094
Total	4.45	4.23	2.83	23.1	0.05	0.04	3.92	3.96	0.04	0.99	1.03	—	4,991	4,991	0.26	0.27	16.7	5,094
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	3.96	3.71	3.23	21.5	0.04	0.04	3.92	3.96	0.04	0.99	1.03	—	4,586	4,586	0.31	0.29	0.43	4,681
Total	3.96	3.71	3.23	21.5	0.04	0.04	3.92	3.96	0.04	0.99	1.03	—	4,586	4,586	0.31	0.29	0.43	4,681
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	0.55	0.52	0.42	2.87	0.01	0.01	0.54	0.54	0.01	0.14	0.14	—	588	588	0.04	0.03	0.90	600
Total	0.55	0.52	0.42	2.87	0.01	0.01	0.54	0.54	0.01	0.14	0.14	—	588	588	0.04	0.03	0.90	600

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	—	447	447	0.07	0.01	—	451
Total	—	—	—	—	—	—	—	—	—	—	—	—	447	447	0.07	0.01	—	451
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	—	447	447	0.07	0.01	—	451
Total	—	—	—	—	—	—	—	—	—	—	—	—	447	447	0.07	0.01	—	451
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	—	74.0	74.0	0.01	< 0.005	—	74.7
Total	—	—	—	—	—	—	—	—	—	—	—	—	74.0	74.0	0.01	< 0.005	—	74.7

4.2.2. Electricity Emissions By Land Use - Mitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	—	415	415	0.07	0.01	—	419
Total	—	—	—	—	—	—	—	—	—	—	—	—	415	415	0.07	0.01	—	419
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	—	415	415	0.07	0.01	—	419
Total	—	—	—	—	—	—	—	—	—	—	—	—	415	415	0.07	0.01	—	419
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	—	68.6	68.6	0.01	< 0.005	—	69.3
Total	—	—	—	—	—	—	—	—	—	—	—	—	68.6	68.6	0.01	< 0.005	—	69.3

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	0.04	0.02	0.37	0.31	< 0.005	0.03	—	0.03	0.03	—	0.03	—	436	436	0.04	< 0.005	—	438
Total	0.04	0.02	0.37	0.31	< 0.005	0.03	—	0.03	0.03	—	0.03	—	436	436	0.04	< 0.005	—	438
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	0.04	0.02	0.37	0.31	< 0.005	0.03	—	0.03	0.03	—	0.03	—	436	436	0.04	< 0.005	—	438
Total	0.04	0.02	0.37	0.31	< 0.005	0.03	—	0.03	0.03	—	0.03	—	436	436	0.04	< 0.005	—	438
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	0.01	< 0.005	0.07	0.06	< 0.005	0.01	—	0.01	0.01	—	0.01	—	72.3	72.3	0.01	< 0.005	—	72.5
Total	0.01	< 0.005	0.07	0.06	< 0.005	0.01	—	0.01	0.01	—	0.01	—	72.3	72.3	0.01	< 0.005	—	72.5

4.2.4. Natural Gas Emissions By Land Use - Mitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	0.04	0.02	0.32	0.27	< 0.005	0.02	—	0.02	0.02	—	0.02	—	386	386	0.03	< 0.005	—	387

Total	0.04	0.02	0.32	0.27	< 0.005	0.02	—	0.02	0.02	—	0.02	—	386	386	0.03	< 0.005	—	387
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	0.04	0.02	0.32	0.27	< 0.005	0.02	—	0.02	0.02	—	0.02	—	386	386	0.03	< 0.005	—	387
Total	0.04	0.02	0.32	0.27	< 0.005	0.02	—	0.02	0.02	—	0.02	—	386	386	0.03	< 0.005	—	387
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	0.01	< 0.005	0.06	0.05	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	63.9	63.9	0.01	< 0.005	—	64.1
Total	0.01	< 0.005	0.06	0.05	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	63.9	63.9	0.01	< 0.005	—	64.1

4.3. Area Emissions by Source

4.3.1. Unmitigated

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

Source	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.73	0.73	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.04	0.04	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.26	0.24	0.01	1.48	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	6.10	6.10	< 0.005	< 0.005	—	6.12
Total	1.04	1.02	0.01	1.48	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	6.10	6.10	< 0.005	< 0.005	—	6.12

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.73	0.73	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.04	0.04	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	0.77	0.77	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.13	0.13	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.01	0.01	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.02	0.02	< 0.005	0.13	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.50	0.50	< 0.005	< 0.005	—	0.50
Total	0.16	0.16	< 0.005	0.13	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.50	0.50	< 0.005	< 0.005	—	0.50

4.3.2. Mitigated

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

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

Consumer Products	0.68	0.68	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.04	0.04	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.26	0.24	0.01	1.48	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	6.10	6.10	< 0.005	< 0.005	—	6.12
Total	0.98	0.96	0.01	1.48	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	6.10	6.10	< 0.005	< 0.005	—	6.12
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.68	0.68	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.04	0.04	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	0.72	0.72	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.12	0.12	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.01	0.01	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.02	0.02	< 0.005	0.13	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.50	0.50	< 0.005	< 0.005	—	0.50

Total	0.15	0.15	< 0.005	0.13	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.50	0.50	< 0.005	< 0.005	—	0.50

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	8.20	10.1	18.3	0.84	0.02	—	45.3
Total	—	—	—	—	—	—	—	—	—	—	—	8.20	10.1	18.3	0.84	0.02	—	45.3
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	8.20	10.1	18.3	0.84	0.02	—	45.3
Total	—	—	—	—	—	—	—	—	—	—	—	8.20	10.1	18.3	0.84	0.02	—	45.3
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	1.36	1.67	3.02	0.14	< 0.005	—	7.51
Total	—	—	—	—	—	—	—	—	—	—	—	1.36	1.67	3.02	0.14	< 0.005	—	7.51

4.4.2. Mitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	8.20	10.1	18.3	0.84	0.02	—	45.3
Total	—	—	—	—	—	—	—	—	—	—	—	8.20	10.1	18.3	0.84	0.02	—	45.3
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	8.20	10.1	18.3	0.84	0.02	—	45.3
Total	—	—	—	—	—	—	—	—	—	—	—	8.20	10.1	18.3	0.84	0.02	—	45.3
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	1.36	1.67	3.02	0.14	< 0.005	—	7.51
Total	—	—	—	—	—	—	—	—	—	—	—	1.36	1.67	3.02	0.14	< 0.005	—	7.51

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	198	0.00	198	19.8	0.00	—	694
Total	—	—	—	—	—	—	—	—	—	—	—	198	0.00	198	19.8	0.00	—	694

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	198	0.00	198	19.8	0.00	—	694
Total	—	—	—	—	—	—	—	—	—	—	—	198	0.00	198	19.8	0.00	—	694
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	32.9	0.00	32.9	3.28	0.00	—	115
Total	—	—	—	—	—	—	—	—	—	—	—	32.9	0.00	32.9	3.28	0.00	—	115

4.5.2. Mitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	99.2	0.00	99.2	9.92	0.00	—	347
Total	—	—	—	—	—	—	—	—	—	—	—	99.2	0.00	99.2	9.92	0.00	—	347
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	99.2	0.00	99.2	9.92	0.00	—	347
Total	—	—	—	—	—	—	—	—	—	—	—	99.2	0.00	99.2	9.92	0.00	—	347
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	16.4	0.00	16.4	1.64	0.00	—	57.5
Total	—	—	—	—	—	—	—	—	—	—	—	16.4	0.00	16.4	1.64	0.00	—	57.5

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.87	0.87
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.87	0.87
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.87	0.87
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.87	0.87
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.14	0.14
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.14	0.14

4.6.2. Mitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.86	0.86
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.86	0.86
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.86	0.86
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.86	0.86
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.14	0.14
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.14	0.14

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

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

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

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.7.2. Mitigated

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

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

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

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

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

Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.8.2. Mitigated

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

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

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

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

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.9.2. Mitigated

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

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

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

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

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

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

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

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

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

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

Species	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.4. Soil Carbon Accumulation By Vegetation Type - Mitigated

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

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

4.10.5. Above and Belowground Carbon Accumulation by Land Use Type - Mitigated

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

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

4.10.6. Avoided and Sequestered Emissions by Species - Mitigated

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

Species	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

5. Activity Data

5.1. Construction Schedule

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase	Phase Description
Grading	Grading	6/19/2025	7/9/2025	5.00	15.0	—
Building Construction	Building Construction	6/22/2025	7/6/2026	5.00	271	—
Paving	Paving	11/10/2025	11/21/2025	5.00	10.0	—
Architectural Coating	Architectural Coating	11/18/2025	11/25/2025	5.00	5.00	—

5.2. Off-Road Equipment

5.2.1. Unmitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Grading	Graders	Diesel	Average	1.00	6.00	148	0.41
Grading	Rubber Tired Dozers	Diesel	Average	1.00	6.00	367	0.40
Grading	Tractors/Loaders/Backhoes	Diesel	Average	1.00	7.00	84.0	0.37
Building Construction	Cranes	Diesel	Average	1.00	4.00	367	0.29
Building Construction	Forklifts	Diesel	Average	2.00	6.00	82.0	0.20
Building Construction	Tractors/Loaders/Backhoes	Diesel	Average	2.00	8.00	84.0	0.37

Paving	Cement and Mortar Mixers	Diesel	Average	4.00	6.00	10.0	0.56
Paving	Pavers	Diesel	Average	1.00	7.00	81.0	0.42
Paving	Rollers	Diesel	Average	1.00	7.00	36.0	0.38
Paving	Tractors/Loaders/Backhoes	Diesel	Average	1.00	7.00	84.0	0.37
Architectural Coating	Air Compressors	Diesel	Average	1.00	6.00	37.0	0.48

5.2.2. Mitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Grading	Graders	Diesel	Tier 4 Final	1.00	6.00	148	0.41
Grading	Rubber Tired Dozers	Diesel	Tier 4 Final	1.00	6.00	367	0.40
Grading	Tractors/Loaders/Backhoes	Diesel	Tier 4 Final	1.00	7.00	84.0	0.37
Building Construction	Cranes	Diesel	Tier 4 Final	1.00	4.00	367	0.29
Building Construction	Forklifts	Diesel	Tier 4 Final	2.00	6.00	82.0	0.20
Building Construction	Tractors/Loaders/Backhoes	Diesel	Tier 4 Final	2.00	8.00	84.0	0.37
Paving	Cement and Mortar Mixers	Diesel	Average	4.00	6.00	10.0	0.56
Paving	Pavers	Diesel	Tier 4 Final	1.00	7.00	81.0	0.42
Paving	Rollers	Diesel	Tier 4 Final	1.00	7.00	36.0	0.38
Paving	Tractors/Loaders/Backhoes	Diesel	Tier 4 Final	1.00	7.00	84.0	0.37
Architectural Coating	Air Compressors	Diesel	Tier 4 Final	1.00	6.00	37.0	0.48

5.3. Construction Vehicles

5.3.1. Unmitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix

Grading	—	—	—	—
Grading	Worker	7.50	7.70	LDA,LDT1,LDT2
Grading	Vendor	—	4.00	HHDT,MHDT
Grading	Hauling	0.00	20.0	HHDT
Grading	Onsite truck	—	—	HHDT
Building Construction	—	—	—	—
Building Construction	Worker	10.9	7.70	LDA,LDT1,LDT2
Building Construction	Vendor	5.59	4.00	HHDT,MHDT
Building Construction	Hauling	0.00	20.0	HHDT
Building Construction	Onsite truck	—	—	HHDT
Paving	—	—	—	—
Paving	Worker	17.5	7.70	LDA,LDT1,LDT2
Paving	Vendor	—	4.00	HHDT,MHDT
Paving	Hauling	0.00	20.0	HHDT
Paving	Onsite truck	—	—	HHDT
Architectural Coating	—	—	—	—
Architectural Coating	Worker	2.18	7.70	LDA,LDT1,LDT2
Architectural Coating	Vendor	—	4.00	HHDT,MHDT
Architectural Coating	Hauling	0.00	20.0	HHDT
Architectural Coating	Onsite truck	—	—	HHDT

5.3.2. Mitigated

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

Building Construction	—	—	—	—
Building Construction	Worker	10.9	7.70	LDA,LDT1,LDT2
Building Construction	Vendor	5.59	4.00	HHDT,MHDT
Building Construction	Hauling	0.00	20.0	HHDT
Building Construction	Onsite truck	—	—	HHDT
Paving	—	—	—	—
Paving	Worker	17.5	7.70	LDA,LDT1,LDT2
Paving	Vendor	—	4.00	HHDT,MHDT
Paving	Hauling	0.00	20.0	HHDT
Paving	Onsite truck	—	—	HHDT
Architectural Coating	—	—	—	—
Architectural Coating	Worker	2.18	7.70	LDA,LDT1,LDT2
Architectural Coating	Vendor	—	4.00	HHDT,MHDT
Architectural Coating	Hauling	0.00	20.0	HHDT
Architectural Coating	Onsite truck	—	—	HHDT

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

Non-applicable. No control strategies activated by user.

5.5. Architectural Coatings

Phase Name	Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
Architectural Coating	0.00	0.00	51,150	17,050	—

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (Cubic Yards)	Material Exported (Cubic Yards)	Acres Graded (acres)	Material Demolished (sq. ft.)	Acres Paved (acres)
Grading	0.00	0.00	1.50	0.00	—
Paving	0.00	0.00	0.00	0.00	0.00

5.6.2. Construction Earthmoving Control Strategies

Non-applicable. No control strategies activated by user.

5.7. Construction Paving

Land Use	Area Paved (acres)	% Asphalt
Medical Office Building	0.00	0%

5.8. Construction Electricity Consumption and Emissions Factors

kWh per Year and Emission Factor (lb/MWh)

Year	kWh per Year	CO2	CH4	N2O
2025	0.00	204	0.03	< 0.005
2026	0.00	204	0.03	< 0.005

5.9. Operational Mobile Sources

5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
Medical Office Building	1,187	292	48.4	327,147	5,540	1,364	226	1,527,179

5.9.2. Mitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
Medical Office Building	1,187	292	48.4	327,147	5,540	1,364	226	1,527,179

5.10. Operational Area Sources

5.10.1. Hearths

5.10.1.1. Unmitigated

5.10.1.2. Mitigated

5.10.2. Architectural Coatings

Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
0	0.00	51,150	17,050	—

5.10.3. Landscape Equipment

Season	Unit	Value
Snow Days	day/yr	0.00
Summer Days	day/yr	180

5.10.4. Landscape Equipment - Mitigated

Season	Unit	Value
Snow Days	day/yr	0.00
Summer Days	day/yr	180

5.11. Operational Energy Consumption

5.11.1. Unmitigated

Electricity (kWh/yr) and CO2 and CH4 and N2O and Natural Gas (kBTU/yr)

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Medical Office Building	799,522	204	0.0330	0.0040	1,361,923

5.11.2. Mitigated

Electricity (kWh/yr) and CO2 and CH4 and N2O and Natural Gas (kBTU/yr)

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Medical Office Building	741,790	204	0.0330	0.0040	1,204,884

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Medical Office Building	4,278,886	480,452

5.12.2. Mitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Medical Office Building	4,278,886	480,452

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Medical Office Building	368	—

5.13.2. Mitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Medical Office Building	184	—

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
Medical Office Building	Household refrigerators and/or freezers	R-134a	1,430	0.45	0.60	0.00	1.00
Medical Office Building	Other commercial A/C and heat pumps	R-410A	2,088	< 0.005	4.00	4.00	18.0

5.14.2. Mitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
Medical Office Building	Household refrigerators and/or freezers	R-134a	1,430	0.45	0.60	0.00	1.00
Medical Office Building	Other commercial A/C and heat pumps	R-410A	2,088	< 0.005	4.00	2.00	18.0

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor

5.15.2. Mitigated

Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

Equipment Type	Fuel Type	Number per Day	Hours per Day	Hours per Year	Horsepower	Load Factor

5.16.2. Process Boilers

Equipment Type	Fuel Type	Number	Boiler Rating (MMBtu/hr)	Daily Heat Input (MMBtu/day)	Annual Heat Input (MMBtu/yr)

5.17. User Defined

Equipment Type	Fuel Type

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres

5.18.1.2. Mitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres

5.18.1.2. Mitigated

Biomass Cover Type	Initial Acres	Final Acres

5.18.2. Sequestration

5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)

5.18.2.2. Mitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

Cal-Adapt midcentury 2040–2059 average projections for four hazards are reported below for your project location. These are under Representation Concentration Pathway (RCP) 8.5 which assumes GHG emissions will continue to rise strongly through 2050 and then plateau around 2100.

Climate Hazard	Result for Project Location	Unit
Temperature and Extreme Heat	32.1	annual days of extreme heat
Extreme Precipitation	1.25	annual days with precipitation above 20 mm
Sea Level Rise	—	meters of inundation depth
Wildfire	0.00	annual hectares burned

Temperature and Extreme Heat data are for grid cell in which your project are located. The projection is based on the 98th historical percentile of daily maximum/minimum temperatures from observed historical data (32 climate model ensemble from Cal-Adapt, 2040–2059 average under RCP 8.5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Extreme Precipitation data are for the grid cell in which your project are located. The threshold of 20 mm is equivalent to about ¾ an inch of rain, which would be light to moderate rainfall if received over a full day or heavy rain if received over a period of 2 to 4 hours. Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Sea Level Rise data are for the grid cell in which your project are located. The projections are from Radke et al. (2017), as reported in Cal-Adapt (Radke et al., 2017, CEC-500-2017-008), and consider inundation location and depth for the San Francisco Bay, the Sacramento-San Joaquin River Delta and California coast resulting different increments of sea level rise coupled with extreme storm events. Users may select from four scenarios to view the range in potential inundation depth for the grid cell. The four scenarios are: No rise, 0.5 meter, 1.0 meter, 1.41 meters
Wildfire data are for the grid cell in which your project are located. The projections are from UC Davis, as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider historical data of climate, vegetation, population density, and large (> 400 ha) fire history. Users may select from four model simulations to view the range in potential wildfire probabilities for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

6.2. Initial Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	5	0	0	N/A
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	N/A	N/A	N/A	N/A

Wildfire	N/A	N/A	N/A	N/A
Flooding	0	0	0	N/A
Drought	0	0	0	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	0	0	0	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores do not include implementation of climate risk reduction measures.

6.3. Adjusted Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	5	1	1	4
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	N/A	N/A	N/A	N/A
Wildfire	N/A	N/A	N/A	N/A
Flooding	1	1	1	2
Drought	1	1	1	2
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	1	1	1	2

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores include implementation of climate risk reduction measures.

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Exposure Indicators	—
AQ-Ozone	88.7
AQ-PM	95.6
AQ-DPM	33.1
Drinking Water	84.4
Lead Risk Housing	12.6
Pesticides	0.00
Toxic Releases	64.8
Traffic	44.9
Effect Indicators	—
CleanUp Sites	37.6
Groundwater	59.6
Haz Waste Facilities/Generators	76.8
Impaired Water Bodies	0.00
Solid Waste	0.00
Sensitive Population	—
Asthma	39.4
Cardio-vascular	10.1
Low Birth Weights	79.0
Socioeconomic Factor Indicators	—
Education	40.5
Housing	35.3
Linguistic	55.1
Poverty	58.3
Unemployment	71.7

7.2. Healthy Places Index Scores

The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Economic	—
Above Poverty	55.34453997
Employed	76.27357885
Median HI	55.98614141
Education	—
Bachelor's or higher	72.69344283
High school enrollment	100
Preschool enrollment	9.097908379
Transportation	—
Auto Access	68.11240857
Active commuting	7.096111895
Social	—
2-parent households	21.62196843
Voting	55.52418837
Neighborhood	—
Alcohol availability	70.52482998
Park access	51.02014629
Retail density	77.7235981
Supermarket access	40.75452329
Tree canopy	18.11882459
Housing	—
Homeownership	41.63993327
Housing habitability	65.46901065
Low-inc homeowner severe housing cost burden	89.29808803
Low-inc renter severe housing cost burden	58.69369947

Uncrowded housing	50.16040036
Health Outcomes	—
Insured adults	67.86860003
Arthritis	32.9
Asthma ER Admissions	72.3
High Blood Pressure	32.4
Cancer (excluding skin)	25.9
Asthma	46.1
Coronary Heart Disease	47.4
Chronic Obstructive Pulmonary Disease	45.1
Diagnosed Diabetes	65.9
Life Expectancy at Birth	76.4
Cognitively Disabled	76.7
Physically Disabled	90.7
Heart Attack ER Admissions	83.6
Mental Health Not Good	58.7
Chronic Kidney Disease	55.3
Obesity	62.5
Pedestrian Injuries	19.6
Physical Health Not Good	60.5
Stroke	45.2
Health Risk Behaviors	—
Binge Drinking	43.3
Current Smoker	70.9
No Leisure Time for Physical Activity	56.1
Climate Change Exposures	—
Wildfire Risk	0.0
SLR Inundation Area	0.0

Children	32.5
Elderly	56.5
English Speaking	52.2
Foreign-born	35.7
Outdoor Workers	70.2
Climate Change Adaptive Capacity	—
Impervious Surface Cover	52.6
Traffic Density	49.3
Traffic Access	0.0
Other Indices	—
Hardship	43.1
Other Decision Support	—
2016 Voting	44.7

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	55.0
Healthy Places Index Score for Project Location (b)	51.0
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	No
Project Located in a Low-Income Community (Assembly Bill 1550)	No
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	No

a: The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.
b: The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

7.4. Health & Equity Measures

No Health & Equity Measures selected.

7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

7.6. Health & Equity Custom Measures

No Health & Equity Custom Measures created.

8. User Changes to Default Data

Screen	Justification
Construction: Construction Phases	More realistic scenarios