California Environmental Quality Act

Draft Environmental Impact Report

Calwa Elementary School Reconstruction

State Clearinghouse (SCH) Number: 2026030919



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September 2026

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Chapter 1 Executive Summary

1.1 Introduction

Under the California Environmental Quality Act (CEQA), an Environmental Impact Report (EIR) is required for a discretionary project undertaken by public agencies when the lead agency determines that the project may result in significant environmental impacts.

On March 20, 2026, the Fresno Unified School District (District), acting as the Lead Agency, circulated a Notice of Preparation (NOP) for a Draft Environmental Impact Report (DEIR) for the proposed Calwa Elementary School Reconstruction Project (Project) (State Clearinghouse No. 2026030919), pursuant to Section 15082 of the State CEQA Guidelines. The NOP was distributed to local and state agencies, as well as other interested parties, for review and comment. The public review period extended from March 20 through April 19, 2026.

A public scoping meeting was held on April 9, 2026, at Calwa Elementary School, located at 4303 E. Jensen Avenue, Fresno, California 93725. The purpose of the NOP and the scoping meeting was to solicit input from responsible agencies, stakeholders, and members of the public regarding the scope and content of the environmental analysis to be included in the EIR, consistent with the requirements of the State CEQA Guidelines.

The NOP described the Project, including its location, objectives, alternatives, and potential environmental effects. Copies of the NOP, along with comments received from agencies and the public during the scoping period, are provided in Appendix A of this DEIR.

The purpose of an EIR is to provide full disclosure of the potentially significant environmental effects of the project to the public and the decision-makers, and explore the means to mitigate (i.e., reduce, avoid, or eliminate) those impacts through special mitigation measures or alternatives to the project. CEQA intends that the preparation of an EIR be a public process that provides meaningful opportunities for public input regarding environmental effects.

Under Section 15123 of the State CEQA Guidelines, an EIR must include a brief executive summary of the proposed action and its consequences. This executive summary is required to identify:

- **Significant environmental effects.** The summary must list each significant environmental effect, along with proposed mitigation measures that would minimize, reduce or avoid the impact and project alternatives capable of minimizing, reducing, or avoiding the impact
- **Areas of controversy.** The summary must identify areas of controversy known to the lead agency, including issues raised by public agencies and or members of the public;
- **Issues to be resolved**. The summary must highlight issues that remain unresolved, including the choice among alternatives and whether, and how, to mitigate significant effects.

This DEIR has been prepared to evaluate the potential environmental impacts of the proposed project in accordance with the California Environmental Quality Act (CEQA) (Public Resources Code [PRC] Section 21000 et seq.) and the State CEQA Guidelines (California Code of Regulations [CCR], Title 14, Section 15000 et seq.).

1.2 Project Description

The District proposes to implement the Calwa Elementary School Reconstruction Project (the "project") using Measure H bond funds. The existing campus buildings, constructed between 1945 and 1970, are among the oldest in the District and no longer meet current District standards or adequately serve student needs. The project would

involve selective demolition and reconstruction of certain campus buildings, while other buildings would undergo interior renovation. Construction would occur in two overlapping phases while instruction remains in session. The project's purpose is to replace and renovate facilities that no longer meet current building, accessibility, and educational standards.

The proposed campus reconstruction would include a new Multipurpose Room (MPR), Administration Office, and Early Learning Building, as well as interior renovations to seven existing buildings. Site improvements would include a new parking lot with a student drop-off loop in the northwest portion of the campus, a staff parking lot in the southeast, a bus drop-off loop in the south, and redeveloped play areas in the north and northeast.

The project would not increase student enrollment or overall campus capacity. Instead, it would provide students and staff with equitable access to modern, energy-efficient, accessible, and safe facilities that are consistent with other recently modernized District campuses. Construction is anticipated to begin in June 2028 and end in August 2030.

1.3 Project Location

The project site is located on the existing Calwa Elementary School campus, at 4303 East Jensen Avenue, Fresno, California 93725 (APN 480-351-27T). The approximate 10-acre project area includes the 7.89-acre campus, and 1.11 acres of adjacent sidewalk right-of-way and City of Fresno roads.

The site is bordered to the west by the unincorporated community of Calwa in Fresno County. Land uses within approximately a 0.5-mile radius are predominately residential to the north, east, west, and southwest, while industrial uses are located to the southeast. Within a broader 2.5-mile radius, the surrounding land use pattern transitions to more extensive industrial development to the south, southwest, and southeast. The project site is also situated near a major freight and transportation corridor. The BNSF and Union Pacific rail lines are located approximately 0.4 miles southwest of the site, State Route 99 is located about 0.85 miles to the southwest, and State Route 41 is located approximately 1.7 miles to the west.

1.4 Project Objectives

A primary objective of the District is to ensure that the facilities provided to students are adequate and responsive to the educational needs of the community. To achieve this goal, the District develops and implements a Facilities Master Plan (Fresno Unified School District, 2009) that identifies both short- and long-term facilities needs and establishes priorities for construction, modernization, and maintenance projects. The plan is based on an assessment of the condition and adequacy of existing facilities, projections of future enrollments, and alignment with the District's vision for the instructional program. In addition, the District is committed to keeping the public informed about facility construction and modernization needs. The District developed the project's objectives grom the principles of the District's Facilities Master Plan and the their understanding of facility conditions and operational challenges at Calwa Elementary School.

The objectives of the project evaluated in this EIR include:

1. **Provide, Equitable, and Inclusive Educational Facilities**
   Upgrade or replace aging obsolete buildings to ensure students in a historically underserved community have access to safe, equitable, ADA-complainant, and inclusive learning environments that support modern instructional methods, technology integration, and the District's long-term educational goals.

2. **Improve Student Health, Safety, and Environmental Quality**
   Improve facilities that would meet current building, fire, accessibility, and environmental health standards; reduce exposure to environmental hazards; and incorporate Assembly Bill 617 (AB 617)[1] strategies to improve indoor environmental quality and student wellbeing.

3. **Enhance Campus Security and Operational Efficiency**
   Implement a modern campus layout that incorporates current school safety design principles – such as a single point of entry—while improving internal circulation, day-to-day operations, and overall campus functionality.

4. **Replace Inefficient Facilities to Reduce Long Term Costs**
   Remove deteriorated and inefficient buildings that no longer meet current educational, energy, or infrastructure needs and replace them with durable, future ready facilities designed to reduce lifecycle operating, utility, and maintenance costs.

5. **Maximize Cost Effectiveness and Efficient Use of Measure H Funds**
   Construct the project in a cost-effective manner while maintaining student safety and uninterrupted operations. Maximize the District's ability to allocate remaining Measure H funds to other campuses with significant facility needs.

1.5 Potential Areas of Concern and Issues to be Resolved

The State CEQA Guidelines require that an EIR provides a list of issues that are likely to raise controversy and are of particular interest to the public. The following issues are most likely to produce controversy during review and considering the project:

- **Historic Architectural Resources:** Demolition of one building and renovations to three buildings that have been determined eligible for listing in the California Register of Historic Resources (CRHR), resulting in potentially significant impacts to historic resources;
- **Air Quality Impacts:** Air quality impacts associated with demolition and construction activities within an AB 617 Community Air Protection Area;
- **Hazardous Materials:** The presence of hazardous materials in existing buildings and known soil contamination on the project site including potential risks associated with demolition, excavation, site remediation, and exposure to construction workers, students, staff, and the surrounding community.

1.6 Summary of Impacts and Mitigation Measures

Table 1 summarizes the impacts of the project (with impact conclusions of either No Impact, Less-than-Significant Impact, or Potentially Significant or Significant Impact) and mitigation measures that would be implemented to reduce these impacts.

[1] AB 617 established the Community Air Protection Program to reduce exposure in communities most impacted by air pollution.

TABLE 1: SUMMARY OF IMPACTS AND MITIGATION MEASURES

Impacts	Level of Significance Before Mitigation	Mitigation Measure	Level of Significance After Mitigation
Impact AQ-A: During construction, would the proposed project conflict with or obstruct implementation of the applicable air quality plan? *And* **Impact AQ-C:** Would the project expose sensitive receptors to substantial pollutant concentrations?	Significant Impact	**MM-AQ-1: Use of Tier 4 Final (or Cleaner) Construction Equipment.** Prior to the start of construction, the Design-Build Entity shall provide documentation to the Lead Agency demonstrating that all off-road diesel-powered construction equipment greater than 50 horsepower used on-site shall meet U.S. EPA/CARB Tier 4 Final emissions standards or shall utilize zero-emission or electric equipment where available. If certain specialized equipment is not commercially available in Tier 4 Final configuration, the Design-Build Entity shall demonstrate to the Lead Agency that such equipment is unavailable within the regional rental market. In such cases, the Design-Build Entity shall employ all feasible controls, including but not limited to: 1. Use of Tier 4 Interim equipment only when Tier 4 Final is demonstrably unavailable; 2. Installation of CARB-verified diesel emission control devices on non-Tier-4 equipment; 3. Mandatory use of R99/R100 renewable diesel fuel, consistent with CARB's 2024 off-road diesel requirements; 4. Limiting operating hours and staging equipment away from sensitive receptors. The Design-Build Entity shall submit equipment lists, tier certifications, and renewable diesel purchase records to the Lead Agency prior to grading permit issuance and quarterly thereafter until construction is complete.	Less than Significant Impact with Mitigation Incorporated
Impact AQ-A: During construction, would the proposed project conflict with or obstruct	Significant Impact	**MM-AQ-2: Heavy-Duty Vehicle and Equipment Anti-Idling Requirements.** To reduce diesel particulate matter and NO_X emissions, all on-road heavy-duty trucks and off-road construction equipment operating on the project site shall comply with the California Air Resources Board (CARB) 5-minute idling limits	Less than Significant Impact with

Impacts	Level of Significance Before Mitigation	Mitigation Measure	Level of Significance After Mitigation
implementation of the applicable air quality plan? *And* **Impact AQ-C:** Would the project expose sensitive receptors to substantial pollutant concentrations?		for diesel vehicles and equipment under the Statewide Anti-Idling Airborne Toxic Control Measure (ATCM). The following measures shall be implemented: 1. Idling shall not exceed 5 minutes for any diesel-fueled on-road truck or off-road equipment, unless exempt under CARB regulations (e.g., for safety or manufacturer-specified cool-down periods). 2. Posted signage shall be installed at all construction entrances and equipment staging areas stating, "Idling Limit 5 Minutes – State Law." 3. Construction contracts shall include language requiring compliance with CARB idling restrictions, including the CARB Off-Road Diesel Regulation's idling policy requirements. 4. The Design-Build Entity shall maintain on-site logs demonstrating compliance and shall train all operators and subcontractors on idling limits prior to the start of construction. The Lead Agency shall conduct periodic inspections to verify compliance. Repeated violations may result in corrective actions, including removal of non-compliant sub-contractors from the site.	Mitigation Incorporated
Impact HIST-A: Cause a substantial adverse change in the significance of a historical resource pursuant to State CEQA Guidelines § 15064.5?	Significant and Unavoidable Impact	**MM-HIST-1: Historic Documentation Prior to Demolition** Prior authorizing demolition activities to proceed, the District documented the MPR in accordance with the Historic American Buildings Survey and Historic American Engineering Record standards at the appropriate level, or California Historical Resources Information System architectural documentation standards, as determined in consultation with a qualified architectural historian meeting the Secretary of the Interior's Professional Qualification Standards. Documentation shall, at a minimum, include the following components:	Significant and Unavoidable Impact with Mitigation Incorporated

Impacts	Level of Significance Before Mitigation	Mitigation Measure	Level of Significance After Mitigation
		• Large-format digital photographs documenting all exterior elevations, significant interior spaces, character-defining features, landscape relationships, and architectural details. • A complete written architectural description addressing form, materials, design, alterations, integrity, and period of significance. • Scaled site plans and measured drawings are sufficient to illustrate spatial relationships, footprint, and defining architectural elements. The completed documentation package shall be submitted to the City of Fresno Historical Preservation Committee, the Central Information Center of the California Historical Resources Information System, and the District archives prior to the start of demolition activities.	
Impact HIST-A: Cause a substantial adverse change in the significance of a historical resource pursuant to State CEQA Guidelines § 15064.5?	Significant and Unavoidable Impact	**MM-HIST-2: Salvage Evaluation, Design Integration, and Historical Materials Salvage Plan** Prior to demolition of the MPR, the Design-Build Entity shall retain a qualified architectural historian to review the building and identify character-defining architectural elements that contribute to its historic significance. The review shall include an evaluation of opportunities for salvage and reuse of building materials and architectural elements, where feasible and practical, considering factors such as condition, constructability, safety, cost, and compatibility with the proposed project. Components that may be evaluated for salvage include, but are not limited to, Roman brick, decorative masonry features, signage, and other distinctive architectural details. The findings of the review shall be provided to the District and considered during project design. To the extent feasible, the replacement building and site improvements shall incorporate design elements that reflect the character-defining features of the existing MPR, including the use of similar materials, colors, textures, brick detailing, massing, or architectural features associated with the building's mid-century modern design. Salvaged materials, if determined feasible for reuse, may be incorporated into the replacement	Significant and Unavoidable Impact with Mitigation Incorporated

Impacts	Level of Significance Before Mitigation	Mitigation Measure	Level of Significance After Mitigation
		building, site features, landscape elements, signage, or interpretive displays. A final Historical Material Salvage Plan shall be developed by the Design-Build Entity and approved by the District and implemented during demolition activities (see MM-HIST-5 and 6).	
Impact HIST-A: Cause a substantial adverse change in the significance of a historical resource pursuant to State CEQA Guidelines § 15064.5?	Significant and Unavoidable Impact	**MM-HIST-3: Interpretive and Commemorative Materials** The Design-Build Entity, in coordination with the District, shall develop and implement a permanent interpretive program to commemorate the demolished historic resource of the MPR. Interpretive materials may include plaques, signage, digital exhibits, or integrated landscape features. Interpretation shall describe the history, architecture, period of significance, and role of the demolished building within the development of the campus. Interpretive content shall be prepared in consultation with a qualified historian or architectural historian and installed on the project site prior to project occupancy.	Significant and Unavoidable Impact with Mitigation Incorporated
Impact HIST-A: Cause a substantial adverse change in the significance of a historical resource pursuant to State CEQA Guidelines § 15064.5?	Significant and Unavoidable Impact	**MM-HIST-4: Archival Recordation and Curation** The District shall ensure that all historic documentation, archival research, drawings, and photographs collected as part of the mitigation program related to the MPR are curated in both digital and hard-copy formats and provided to the City of Fresno Historical Preservation Committee. Copies shall be retained by the District for long-term access and made available to researchers upon request.	Significant and Unavoidable Impact with Mitigation Incorporated
Impact HIST-A: Cause a substantial adverse change in the significance of a historical resource pursuant to State CEQA Guidelines § 15064.5?	Significant and Unavoidable Impact	**MM-HIST-5: Demolition Worker Salvage Training** Prior to the start of demolition activities, the Design-Build Entity shall require that the construction workers managing or actively participating in demolition activities of the MPR receive a briefing on the historical significance of the MPR, the character-defining features identified for salvage in the approved Historical Materials Salvage Plan, and applicable controlled demolition methods. Training documentation shall be maintained by the Design-Build Entity and verified by the District.	Significant and Unavoidable Impact with Mitigation Incorporated

Impacts	Level of Significance Before Mitigation	Mitigation Measure	Level of Significance After Mitigation
Impact HIST-A: Cause a substantial adverse change in the significance of a historical resource pursuant to State CEQA Guidelines § 15064.5?	Significant and Unavoidable Impact	**MM-HIST-6: Controlled Demolition Procedures** The Design-Build Entity shall implement demolition methods designed to minimize unnecessary damage to materials identified for salvage in the Historical Materials Salvage Plan. Mechanical demolition shall be limited in areas where manual removal is required to extract identified architectural features for salvage.	Significant and Unavoidable Impact with Mitigation Incorporated
Impact HIST-A: Cause a substantial adverse change in the significance of a historical resource pursuant to State CEQA Guidelines § 15064.5?	Significant and Unavoidable Impact	**MM-HIST-7: Post-Demolition Reporting** Following completion of demolition, the Design-Build Entity shall prepare a brief summary memorandum documenting implementation of mitigation measures HIST-1 through HIST-6 and submit it to the District. The memorandum shall confirm completion of documentation, salvage efforts, interpretive installation, and archival curation and shall be retained in the project file.	Significant and Unavoidable Impact with Mitigation Incorporated
Impact HIST-A: Cause a substantial adverse change in the significance of a historical resource pursuant to State CEQA Guidelines § 15064.5?	Significant Impact	**MM-HIST-8: Secretary of the Interior's Standards Compliance** Throughout the plan development process and prior to authorizing construction to proceed, the Design-Build Entity shall ensure that all rehabilitation, alteration, and renovation work affecting Buildings C, D, and J is designed and implemented in a manner consistent with the *Secretary of the Interior's Standards for the Treatment of Historic Properties (36 CFR Part 68)*. This shall include the preservation of character defining features and the compatibility of new materials.	Less than Significant Impact with Mitigation Incorporated
Impact HIST-A: Cause a substantial adverse change in the significance of a historical resource pursuant to State CEQA Guidelines § 15064.5?	Significant Impact	**MM-HIST-9: Historic Materials Protection Plan** After the development of the final design plans, the Design-Build Entity shall retain a qualified architectural historian (meeting the Secretary of the Interior's Professional Qualification Standards) to develop a Historic Materials Protection Plan for all work on or near Buildings C, D, and J, and submit the Plan to the District for approval. The Plan at a minimum shall: • Identify and document character-defining features for protection;	Less than Significant Impact with Mitigation Incorporated

Impacts	Level of Significance Before Mitigation	Mitigation Measure	Level of Significance After Mitigation
		• Identify prudent and feasible physical protection measures (coverings, paddings, barriers, signage, etc.) to be installed by the Design-Build Entity prior to construction on or near the buildings to prevent damage to character-defining features from construction activities; • Identify construction workers whose work on or near the buildings have a moderate or high potential to damage character-defining features to be trained prior to starting construction activities; • Specifically address potential impacts from groundborne vibrations, as identified in MM-NOISE-2; • Identify construction activities involving character defining materials that shall be monitored by the architectural historian, as appropriate.	
Impact HIST-A: Cause a substantial adverse change in the significance of a historical resource pursuant to State CEQA Guidelines § 15064.5?	Significant Impact	**MM-HIST-10: Worker Environmental Awareness Training** Prior to starting their construction activities on or near Buildings C, D, and J, construction personnel whose work has been identified as having a moderate or high potential to damage character defining features in the Historic Materials Protection Plan, and all Design-Build Entity personnel managing these activities, shall receive a training prepared by the architectural historian that: • Identifies the buildings as historical resources; • Reviews the Historic Materials Protection Plan; • Identifies character-defining features to be protected and methods to be implemented to protect these materials; • Identify work that must be monitored by the architectural historian; • Vibratory controls, as identified in MM-NOISE-2; • Outlines required procedures if previously unidentified historical elements are encountered.	Less than Significant Impact with Mitigation Incorporated
Impact HIST-A:	Significant Impact	**MM-HIST-11: Unanticipated Discoveries**	Less than Significant

Impacts	Level of Significance Before Mitigation	Mitigation Measure	Level of Significance After Mitigation
Cause a substantial adverse change in the significance of a historical resource pursuant to State CEQA Guidelines § 15064.5?		If previously unidentified historical features or materials are encountered in or near Buildings C, D, and J during construction: • Work in the immediate area shall cease; • The architectural historian shall evaluate the find; • Recommendations shall be implemented to avoid or minimize impacts.	Impact with Mitigation Incorporated
Impact HIST-A: Cause a substantial adverse change in the significance of a historical resource pursuant to State CEQA Guidelines § 15064.5?	Significant Impact	**MM-HIST-12: Construction Protection Measures** During construction in or near Buildings C, D, and J, the Design-Build Entity shall implement protective measures to avoid damage to historic materials, including: • Physical barriers or coverings over sensitive features; • Restrictions on staging or storage within historically sensitive areas; • Vibration control where appropriate.	Less than Significant Impact with Mitigation Incorporated
Impact HIST-A: Cause a substantial adverse change in the significance of a historical resource pursuant to State CEQA Guidelines § 15064.5?	Significant and Unavoidable Impact	**MM-HIST-13: Post-Construction Reporting** Following completion of all construction and renovation activities on/near Buildings C, D, and J, the Design-Build Entity shall prepare a brief summary memorandum documenting implementation of mitigation measures HIST-8 through HIST-12 and submit it to the District. The memorandum shall confirm completion of documentation, historic preservation efforts completed, and shall be retained in the project file.	Significant and Unavoidable Impact with Mitigation Incorporated
Impact HAZ-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?	Significant Impact	**Mitigation Measure HAZ-1: Lead-Containing Soil Abatement and Management** Lead-containing soil (LCS) has been identified within a limited area of the project site, generally within the planters south of Buildings C and D, encompassing approximately 1,500 square feet. Prior to issuance of grading permits or commencement of ground-disturbing activities, the design-build entity shall retain a qualified environmental professional, registered as a Professional Geologist (PG) or Professional Engineer (PE), to prepare a Soil Management Plan (SMP).	Less than Significant Impact with Mitigation Incorporated

Impacts	Level of Significance Before Mitigation	Mitigation Measure	Level of Significance After Mitigation
		The SMP shall address the handling, management, transport, and disposal of impacted soil identified in the Supplemental Phase II Environmental Site Assessment (ESA) prepared for the project. The SMP shall identify measures necessary to minimize exposure risks to construction workers, students, staff, the public, and off-site receptors during construction and shall establish procedures to prevent the off-site migration of contaminated soil. At a minimum, the SMP shall include the following: **For areas that will remain unpaved:** • Procedures for the excavation to two feet depth below ground surface level, characterization, transportation, and disposal of LCS at an appropriately permitted facility. • Procedures for confirmation sampling, if warranted, and the import and placement of clean fill material following removal of LCS. **For areas that will be paved as part of the project:** • Procedures for the excavation and disposal of any LCS that must be removed to accommodate paving or related construction activities. • Engineering and/or administrative controls to ensure encapsulated LCS remains protected beneath paved surfaces. • Documentation requirements and procedures for future maintenance, utility work, or other subsurface disturbances in areas where LCS remains in place beneath pavement. **General requirements applicable to all affected areas:** • Stockpile management procedures, including implementation of Best Management Practices (BMPs) and stormwater pollution prevention measures to control runoff, erosion, sediment transport, and dust emissions. • Soil monitoring, documentation, and reporting requirements.	

Impacts	Level of Significance Before Mitigation	Mitigation Measure	Level of Significance After Mitigation
		• A site-specific Health and Safety Plan (HASP) that identifies potential hazards associated with construction activities and establishes worker protection requirements in accordance with applicable regulations. Soil handling, dust control, and exposure mitigation procedures to minimize the potential for exposure of construction workers, students, staff, and the public to hazardous materials during construction.	
Impact AES-B: Would the project substantially damage scenic resources, including, but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway?	Significant Impact	For the MPR Building: **MM-HIST-2: Salvage Evaluation, Design Integration, and Historical Materials Salvage Plan** For Buildings C, D, and J: **MM-HIST-8: Secretary of the Interior's Standards Compliance** **MM-HIST-9: Historic Materials Protection Plan** **MM-HIST-10: Worker Environmental Awareness Training** **MM-HIST-11: Unanticipated Discoveries** **MM-HIST-12: Construction Protection Measures** **MM-HIST-13: Post-Construction Reporting** *See above for details on mitigation measures*	Less than Significant Impact with Mitigation Incorporated
Impact BIO-A: Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U. S. Fish and Wildlife Service?	Significant Impact	**MM-BIO-1: Nesting Bird Avoidance and Minimization.** The nesting bird season is between February 1st and August 31st. Trees are expected to be removed at the project site and should be removed before construction begins to prevent birds from nesting in those trees during construction, and those trees should be removed outside of the nesting bird season. As in, trees should be removed between September 1st and January 31st. Structures proposed for demolition could also be used as nesting habitat. Buildings should also be demolished outside of nesting bird season: If trees or structures must be removed during the nesting bird season, then a qualified biologist shall perform a pre-construction nesting bird survey to determine whether birds are currently nesting in trees or structures at the project site.	Less than Significant Impact with Mitigation Incorporated

Impacts	Level of Significance Before Mitigation	Mitigation Measure	Level of Significance After Mitigation
		• If there are no active nests in the trees/structures at the project site, then the trees/structures can be removed during the nesting bird season, but no later than 30 days after the nesting bird survey. Another survey shall be conducted once 30 days have passed from the initial survey. • If an active nest is observed in the trees/structures at the project site, then those trees/structures shall not be removed until a qualified biologist has determined that the nest is no longer being used or that the fledglings are no longer dependent on the nest. o If a biologist is not available for continuous monitoring, then a 250' buffer should be established around the active nest(s) where construction activity is not allowed, aside from vehicle access. o Though unlikely, a 500' buffer should be established for any raptor species nests. o If a buffer is not feasible, then a qualified biologist shall monitor the nest in the meantime and stop nearby construction activity if they determine that nesting behavior is being negatively affected by that activity. o A hybrid approach may be used where a buffer is set around an active bird nest until construction is required near the nest. At this point, a qualified biologist may start to monitor the bird nest. No bird nests shall be removed during the nesting bird season when the nest is active. If a qualified biologist makes the determination that birds are no longer reliant on the nest, then the nest may be removed.	
Impact ARC-A: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to State CEQA Guidelines § 15064.5?	Significant Impact	**Mitigation Measure ARC-1: Inadvertent Discovery of Archaeological Resources** If previously unknown archaeological resources are encountered during ground-disturbing activities, all work shall cease within 50 feet of the discovery. The Design-Build Entity shall immediately notify the District, which	Less than Significant Impact with Mitigation Incorporated

Impacts	Level of Significance Before Mitigation	Mitigation Measure	Level of Significance After Mitigation
		shall retain a qualified archaeologist meeting the Secretary of the Interior's Professional Qualification Standards to evaluate the significance of the find. The archaeologist shall assess the resource and recommend appropriate treatment measures consistent with CEQA Guidelines Section 15064.5. Construction activities shall not resume within the affected area until the archaeologist has determined that the resource has been appropriately recorded, evaluated, and either preserved in place or mitigated through data recovery or other approved measures. Implementation of the archaeologist's recommendations shall reduce impacts to archaeological resources to a less-than-significant level.	
Impact ARC-B: Would the project disturb any human remains, including those interred outside of formal cemeteries?	Significant Impact	**Mitigation Measure ARC-2: Inadvertent Discovery of Human Remains** In the event that human remains are discovered during ground-disturbing activities, all work shall cease immediately within 100 feet of the discovery. The Design-Build Entity shall notify the District, which shall contact the County Coroner pursuant to California Public Resources Code Section 5097.98. If the Coroner determines that the remains are Native American, the Coroner shall notify the Native American Heritage Commission, which shall designate a Most Likely Descendant. The District shall coordinate with the Most Likely Descendant to determine appropriate treatment and disposition of the remains in accordance with state law. No further disturbance of the area shall occur until all required notifications, consultations, and treatment measures have been completed.	Less than Significant Impact with Mitigation Incorporated
Impact GEO-F: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	Significant Impact	**Mitigation Measure GEO-1**: **Inadvertent Paleontological Resource Discovery.** If paleontological resources are inadvertently discovered during ground-disturbing activities, all work within 50 feet of the discovery shall be halted and the construction supervisor shall immediately notify the District and retain a qualified paleontologist who meets the standards of the Society of Vertebrate Paleontology to evaluate the find. The paleontologist shall assess	Less than Significant Impact with Mitigation Incorporated

Impacts	Level of Significance Before Mitigation	Mitigation Measure	Level of Significance After Mitigation
		the significance of the discovered resource in accordance with CEQA Guidelines Section 15064.5 and SVP guidelines. If the find is determined to be a significant paleontological resource, the paleontologist shall develop and implement a treatment plan in consultation with the lead agency. The treatment plan may include, but is not limited to, recovery and curation of the resource at an accredited repository, documentation of the find, and preparation of a report summarizing the methods and results of the recovery. Ground-disturbing activities in the vicinity of the discovery shall not resume until the paleontologist determines that the site has been appropriately managed and cleared for continued work.	
Impact NOISE-A: Would the project result in the 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?	Significant Impact	**MM-NOISE-1: Construction Noise and Vibration Control and Compliance** **1. Noise Ordinance Compliance** The Designer Build Entity shall comply with all applicable local, city, county, state, and federal laws, ordinances, and regulations governing construction noise and vibrations at all times. Construction activities shall be limited to allowable hours as specified by the City of Fresno noise ordinances. **2. Construction Scheduling During School Hours** If school is in session during any phase of construction and, in the District's reasonable judgment, construction noise disrupts or interferes with classroom instruction or normal school operations, the Design-Build Entity shall, at the District's request, reschedule high-noise and vibration activities to occur outside normal instructional hours or implement alternative construction methods. **3. Control of Radios and Nonessential Noise Sources** The use of radios, personal music devices, or other amplified sound sources at the construction site shall be controlled to ensure that sound is not audible beyond the immediate construction area. The District reserves the right to prohibit such devices at the site, except for	Less than Significant Impact with Mitigation Incorporated

Impacts	Level of Significance Before Mitigation	Mitigation Measure	Level of Significance After Mitigation
		communication radios necessary for construction safety and coordination. **4. Equipment Mufflers and Maintenance** All construction equipment, including impact tools, shall be equipped with properly functioning intake and exhaust mufflers. Equipment shall be maintained in good working order to minimize excessive noise, vibration, and rattling. **5. Coordination and Response to Noise and Vibration Complaints** The Design Build Entity shall cooperate with the District to minimize or temporarily suspend the use of particularly noisy or vibratory equipment if such equipment becomes objectionable due to its duration, intensity, or timing. Reasonable adjustments shall be made to construction sequence or methods to reduce disruption. **6. Advance Notice of High-Noise and Vibratory Activities** The Design Build Entity shall provide the District with written notice at least 48 hours in advance of particularly noisy or vibratory construction activities, including but not limited to pneumatic demolition, concrete saw cutting, grading and compaction near buildings, or other high-impact operations. The District may coordinate notifications to staff, students, and nearby residents as appropriate. **7. Construction Equipment and Material Siting** All operating diesel generators shall be located a minimum of 20 feet from any on-site occupied building and from adjacent property lines to the extent feasible. Where site constraints prevent full compliance, generators shall be placed at the maximum feasible distance and oriented to direct noise away from occupied buildings and neighboring properties. Construction equipment, staging areas, and construction materials that require the use or movement of powered equipment for loading, unloading, or repositioning shall not be stored or staged within 20 feet of	

Impacts	Level of Significance Before Mitigation	Mitigation Measure	Level of Significance After Mitigation
		on-site occupied buildings or adjacent property lines, to the extent feasible. Equipment and material storage locations shall be sited to minimize noise exposure to students, staff, and nearby residential receptors.	
Impact NOISE-B: Would the project result in the generation of excessive groundborne vibration or groundborne noise levels? *And* **Impact HIST-A:** Cause a substantial adverse change in the significance of a historical resource pursuant to State CEQA Guidelines § 15064.5?	Significant Impact	**MM-NOISE-2: Restrict High Vibratory Equipment Near Buildings** The following restrictions to high vibratory equipment shall be implemented during construction **1. Prohibit Use of Vibratory Rollers within 26 Feet of Historical Buildings**. Vibratory Rollers shall not be used within 26 feet of historical buildings to be preserved (Buildings C, D, and J). Alternative construction equipment shall be used near these buildings. Static rollers or other low vibratory methods shall be used instead of vibratory rollers for compaction/paving activities within 26 feet of Buildings C, D, and J. **2. Prohibit Use of Vibratory Rollers within 15 Feet of New Buildings**. Vibratory Rollers shall not be used within 15 feet of new completed buildings constructed as a part of the project. Alternative construction equipment shall be used in these areas. Static rollers or other low vibratory methods shall be used instead of vibratory rollers for compaction/paving activities within 15 feet of new completed buildings. **Prohibit Use of Large Bulldozers within 15 Feet of Historical Buildings**. Large bulldozers shall not be used within 15 feet of historical buildings to be preserved (Building C, D, and J). Small bulldozers shall be used instead for grading, demolition, or miscellaneous activities within 15 feet of Buildings C, D, and J.	Less than Significant Impact with Mitigation Incorporated

Impacts	Level of Significance Before Mitigation	Mitigation Measure	Level of Significance After Mitigation
Impact TRAN-A: Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	Significant Impact	**Mitigation Measure TRAN-1: Traffic Engineering Consultation with City and County of Fresno.** The District and the Design-Build Entity for the project shall coordinate with the City of Fresno Public Works Department and/or Traffic Engineering Division and the County of Fresno Public Works and Planning during project design to review proposed parking lot layouts, drive approach locations, internal circulation patterns, pedestrian access points, bicycle access, and associated transportation safety features. This coordination shall include one or more meetings during the design process. The City and County of Fresno may identify reasonable transportation safety improvements necessary to address project-related circulation changes and maintain safe and efficient operation of the adjacent public roadway network. Such improvements shall be consistent with applicable City and County standards, adopted policies, and site-specific engineering considerations and shall be limited to measures reasonably related to project effects.	Less than Significant Impact with Mitigation Incorporated
Impact TCR-1: Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in the Public Resource Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: i. Listed or eligible for listing in the California Register of Historical	Significant Impact	**MM-TCR-1: Inadvertent Tribal Cultural Resources Discovery.** If tribal cultural resources are inadvertently discovered during ground-disturbing activities associated with the project, the following procedures would be implemented: • **Immediate Work Stoppage.** All work within 100 feet of the discovery shall cease immediately. The Design-Build Entity shall notify the project lead agency. • **Notification of Tribal Representatives and Qualified Professional.** The lead agency shall immediately notify all California Native American tribe traditionally and culturally affiliated with the Project area and a qualified archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards. • **Evaluation of the Discovery.** The qualified archaeologist, in consultation with the lead agency and the notified tribes, shall evaluate the find to	Less than Significant Impact with Mitigation Incorporated

Impacts	Level of Significance Before Mitigation	Mitigation Measure	Level of Significance After Mitigation
Resources, or in a local register of historical resources as defined in the Public Resources Code §5020.1(k)? ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe?		determine whether it qualifies as a tribal cultural resource under CEQA Guidelines Section 21074. • **Treatment Plan.** If the resource is determined to be a tribal cultural resource, the lead agency, in consultation with the tribes and the qualified archaeologist, shall develop and implement an appropriate treatment plan. The plan shall outline measures for avoidance, preservation in place, or other culturally appropriate treatment consistent with Public Resources Code Section 21083.2 and CEQA Guidelines Section 15126.4. • **Resumption of Work.** Work in the area of the discovery shall not resume until the treatment plan has been implemented and the lead agency, in consultation with the tribes, authorizes continuation.	

1.7 Unavoidable Significant Environmental Effects

A project would result in unavoidable significant environmental effects if the impacts resulting from the project (both construction-related and operational impacts) were significant and for which no feasible mitigation or only partial mitigation is feasible[2]. Approval and implementation of a project that involves unmitigable significant effects typically require a statement of overriding considerations by the lead agency.

As described in Chapter 3, *Affected Environment, Environmental Consequences, and Mitigation Measures*, the proposed Calwa Elementary School Reconstruction Project would result in one significant and unavoidable environmental impact. Specifically, the project would require demolition of the Multipurpose Room (MPR) (also referred to as Building G) that has been determined as eligible for listing in the California Register of Historical Resources (CRHR). Although mitigation measures would be implemented to reduce the loss of the historical resource, the impact would remain significant. Therefore, impacts on historical resources would remain significant and unavoidable, resulting in a significant irreversible environmental effect. Furthermore, these impacts would contribute to a cumulatively considerable impact on historical resources within the region, including Fresno Unified School District facilities.

Apart from historical resources, all other potentially significant environmental impacts of the proposed project would be reduced to less-than-significant levels through implementation of the mitigation measures summarized in Table 1. and described in detail in Chapter 4.

1.8 Alternatives to the Project

The purpose of the alternatives analysis in an EIR is to identify and evaluate reasonable range of potentially feasible alternatives that could achieve most of the projects objectives, while reducing or avoiding one or more significant environmental impacts (State CEQA Guidelines, Section 15126.6). This DEIR, analyzes two potentially feasible alternatives and a “no project” alternative. Each alternative retains most components of the proposed project described in Section 2.4 *Project Description* but would rehabilitate the MPR for continued use. Alternatives analyzed in this DEIR are summarized below and discussed in greater detail in Chapter 6 *Alternatives*.

1. **Alternative 1A: MPR Adaptive Reuse Alternative**
   Under this alternative, the existing MPR building would be retained and rehabilitated in place while preserving its historical significance and character-defining features. The building would be adaptively reused and renovated to accommodate administrative functions, such as visitor check-in, offices, and related support spaces. A new MPR would be constructed at a nearby location at the campus.

2. **Alternative 1B: MPR Rehabilitation Alternative**
   Under this alternative, the existing MPR building would be retained and rehabilitated in place while preserving its historical significance and character-defining features. Following rehabilitation, the building would continue to function as a multipurpose facility serving the school. A new administrative office would be constructed at a nearby location at the campus.

[2] California Code of Regulations, Title 14, Division 6, Chapter 3, California Environmental Quality Act Guidelines, Section 15126.2(b).

3. **No Project Alternative**
   Under this alternative, the proposed project would not be implemented. The existing elementary school campus would continue to operate under existing conditions, and no major modernization, reconstruction, or demolition activities would occur.

1.9 Comparison of Alternatives

The proposed project would fully meet all of the project objectives, Alternatives 1A and 1B would not fully meet all the project objectives, and the no project alternative would not meet any of the project objectives, as shown in Table 2 and discussed further in Section 6.D *Alternative Projects' Ability to Meet Project Objectives*.

The proposed project would result in a significant and unavoidable impact to historic architectural resources with mitigation incorporated. Alternatives 1A and 1B would result in a less than significant impact to historic architectural resources with mitigation incorporated. The no project alternative would have no impact on any environmental impact topics. The environmental impacts of the proposed project and Alternatives 1A and 1B would be practically the same for every topic other than historic architectural resources, as discussed in Chapters 4 and 6 and shown in detail in Table 27.

The environmentally superior project would be Alternative 1B as it would have a marginally less impact on historical resources, compared to Alternative 1A, as the MPR building would be preserved and rehabilitated while retaining its historical use and require less internal modifications.

TABLE 2: SUMMARY OF COMPARISON OF ALTERNATIVES

Impacts / Objectives	Proposed Project	Alternative 1A: MPR Adaptive Reuse	Alternative 1B: MPR Rehabilitation	No Project
Project Objectives	**This objective would be:**			
1. Provide Equitable and Inclusive Educational Facilities	Fully met	Substantially met	Not fully met	Not met
2. Improve Student Health, Safety, and Environmental Quality	Fully met	Fully met	Fully met	Not met
3. Enhance Campus Security and Operational Efficiency	Fully met	Not fully met	Not fully met	Not met
4. Replace Inefficient Facilities to Reduce Long Term Costs	Fully met	Not fully met	Not fully met	Not met
5. Maximize Cost Effectiveness and Efficient Use of Measure H Funds	Fully met	Not met	Not fully met	Not met
Historic Architectural Resources				
Impact HIST-A. Adverse Change to Historic Resource	Significant and Unavoidable with Mitigation Incorporated	Less Than Significant with Mitigation Incorporated	Less Than Significant with Mitigation Incorporated	No Impact

Notes:
The proposed project and project alternatives (not including the no project alternative) would have the same level of environmental impacts for all environmental impact topics except for historic architectural resources.

The "no project" alternative would not result in any impacts to environmental impact topics.

See Table 1 for environmental impact topics not listed in Table 2 which would be less than significant with mitigation incorporated.

For all environmental impacts not listed in Table 1 or 2, the proposed project and alternatives would have a less than significant or no impact, as discussed in Sections 4 and 6.

Chapter 2 Project Description

2.1 Overview

This chapter of the DEIR describes project objectives, location, proposed actions, and agency approvals that may be required.

Fresno Unified School District traces its origins to 1873, when the community established a unified public school system to serve the growing City of Fresno. In the decades that followed, the District expanded alongside the city's population and development, ultimately encompassing most of Fresno as well as the surrounding communities of Calwa, Mayfair, Old Fig Garden, most of Sunnyside, and a portion of Clovis. As a California public school District, Fresno Unified operates under the authority of the California Education Code and is governed by an elected seven-member Board of Education responsible for policy direction, fiscal oversight, and overall governance. Today, the District is among the largest K–12 public school systems in California, serving more than 70,000 students across 100 schools.

As a public school District operating under the California Constitution and the California Education Code, Fresno Unified School District holds an affirmative legal obligation to provide all resident students with access to a free, equitable, and comprehensive public education. California law establishes education as a fundamental right and requires local educational agencies, including school districts, to deliver accurate, inclusive, and standards-based instruction within safe and supportive learning environments. These responsibilities include offering a full course of study aligned with state curriculum standards, employing qualified instructional staff, and enforcing compulsory education requirements for students ages 6 through 18, as mandated by state law. In fulfilling these obligations, the District provides educational services across its K–12 campuses, administers state-mandated programs, and ensures compliance with federal and state laws that protect student rights and promote equal educational opportunity.

2.2 Project Objectives

The District has identified Calwa Elementary School as one of the campuses with the poorest facility conditions in the District. Accordingly, the District is in the preliminary stages of developing plans to redevelop the site to meet modern educational facility standards, using funding from Ballot Measure H. The objectives of the proposed project include:

1. **Provide, Equitable, and Inclusive Educational Facilities**
   Upgrade or replace aging, obsolete buildings so students in a historically underserved community would have access to safe, equitable, ADA-complainant, and inclusive learning environments that support current instructional methods, technology integration, and long-term District educational goals.

2. **Improve Student Health, Safety, and Environmental Quality**
   Deliver facilities and site improvements that would meet current building, fire, accessibility, and environmental health standards; reduce exposure to environmental hazards; and incorporate AB 617 appropriate strategies to improve indoor environmental quality and promote student wellbeing.

3. **Enhance Campus Security and Operational Efficiency**

Implement a modern campus layout that incorporates contemporary school safety design principles, specifically a single point of entry layout, and improves internal circulation, day-to-day operations, and campus functionality.

4. **Replace Inefficient Facilities to Reduce Long Term Costs**
   Remove deteriorated and inefficient buildings that no longer meet educational, energy, or infrastructure needs and replace them with durable, future ready facilities designed to reduce lifecycle operating, utility, and maintenance burdens.

5. **Maximize Cost Effectiveness and Efficient Use of Measure H Funds**
   Construct the project in a cost-effective manner while keeping students in session and safe. Maximize the District's ability to apply remaining Measure H funds to other campuses with substantial facility needs.

2.3 Project Location

The project site is located on the existing Calwa Elementary School campus at 4303 East Jensen Avenue in Fresno, California 93725 (APN 480-351-27T) (see Figures 1 and 2 and Table 3). The project area encompasses approximately 10 acres, including the 7.89-acre campus and an additional 1.11 acres of adjacent sidewalk right-of-way and City of Fresno streets. The site is designated Public Facilities in the City of Fresno General Plan and is zoned Public and Institutional (PI) (County of Fresno, 2024).

As shown in Figure 1, the campus is located in south-central Fresno, east of Highway 99 and south of Highway 180. Figure 2 depicts surrounding land uses and nearby major roadways. Residential neighborhoods are located to the north, east, west, and southwest, while industrial uses are present to the south and southwest. Figure 3 illustrates the project boundary, which is outlined in red. The site is bounded by Kaviland Avenue to the north, Cedar Avenue to the west, Jensen Avenue to the south, and Rowell Avenue to the east. The campus includes buildings, parking areas, playfields, athletic courts, and playground equipment. A small portion of the project area extends west to include an existing traffic signal and crosswalk across Cedar Avenue.

TABLE 3: PROJECT LOCATION

City	Fresno
County	Fresno
Zip Code	93725
Assessor's Parcel Number	480-351-27T
Nearest Existing Major Cross Streets	S. Cedar Ave. and E. Jensen Ave.
Elevation	293 feet
USGS Map	Fresno South USGS 7.5-Minute Quad Map
Section, Township & Range	Section 13, Township 14 South, Range 20 East
Latitude/Longitude	36° 42' 29.0334" N, -119° 45' 13.2228" W

FIGURE 1: LOCATION MAP

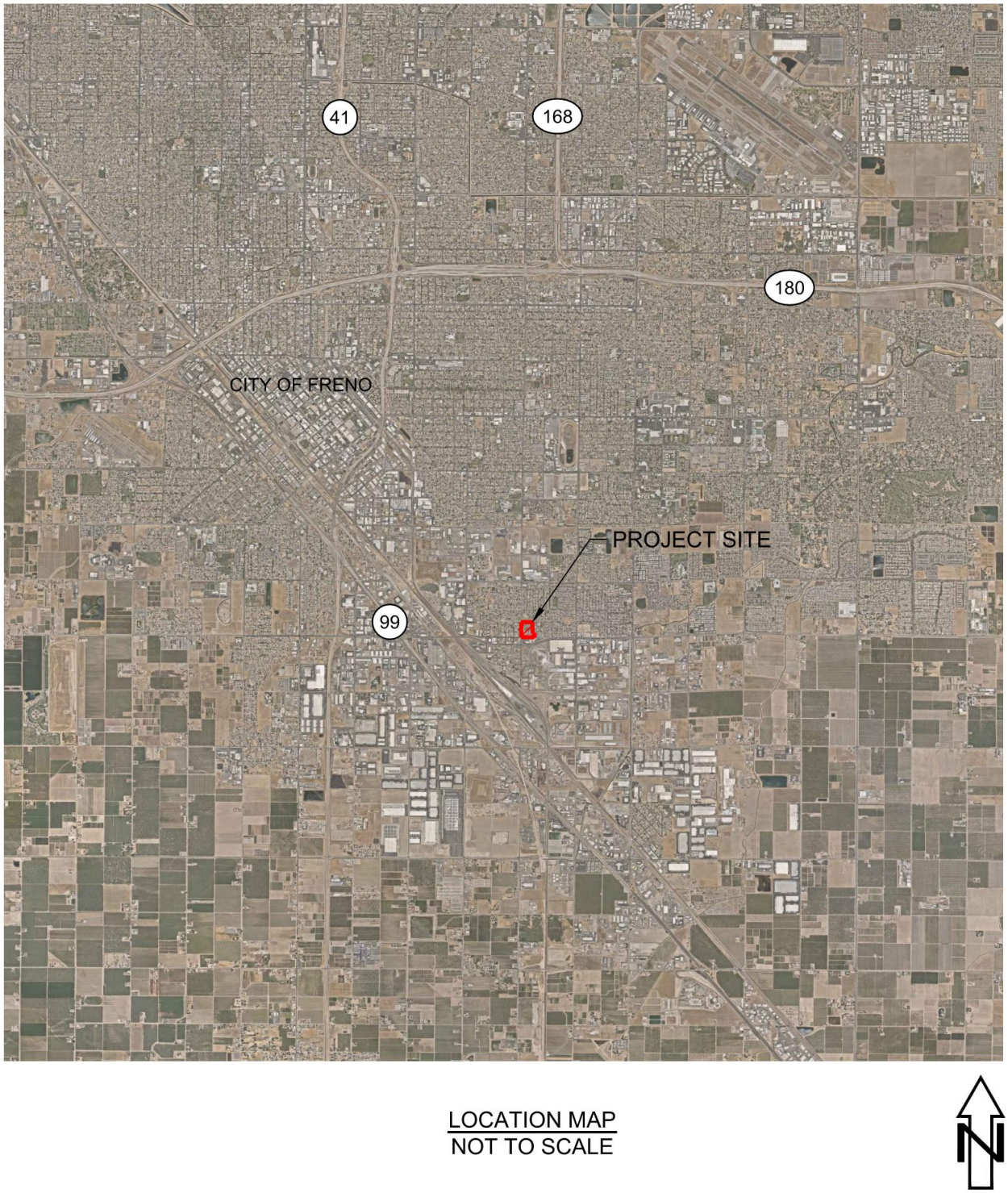


Figure 1: Project Location Map showing an aerial image of the proposed project site in the context of the City of Fresno. The project site is in south-central Fresno, east of Highway 99 and south of Highway 180.

FIGURE 2: VICINITY MAP

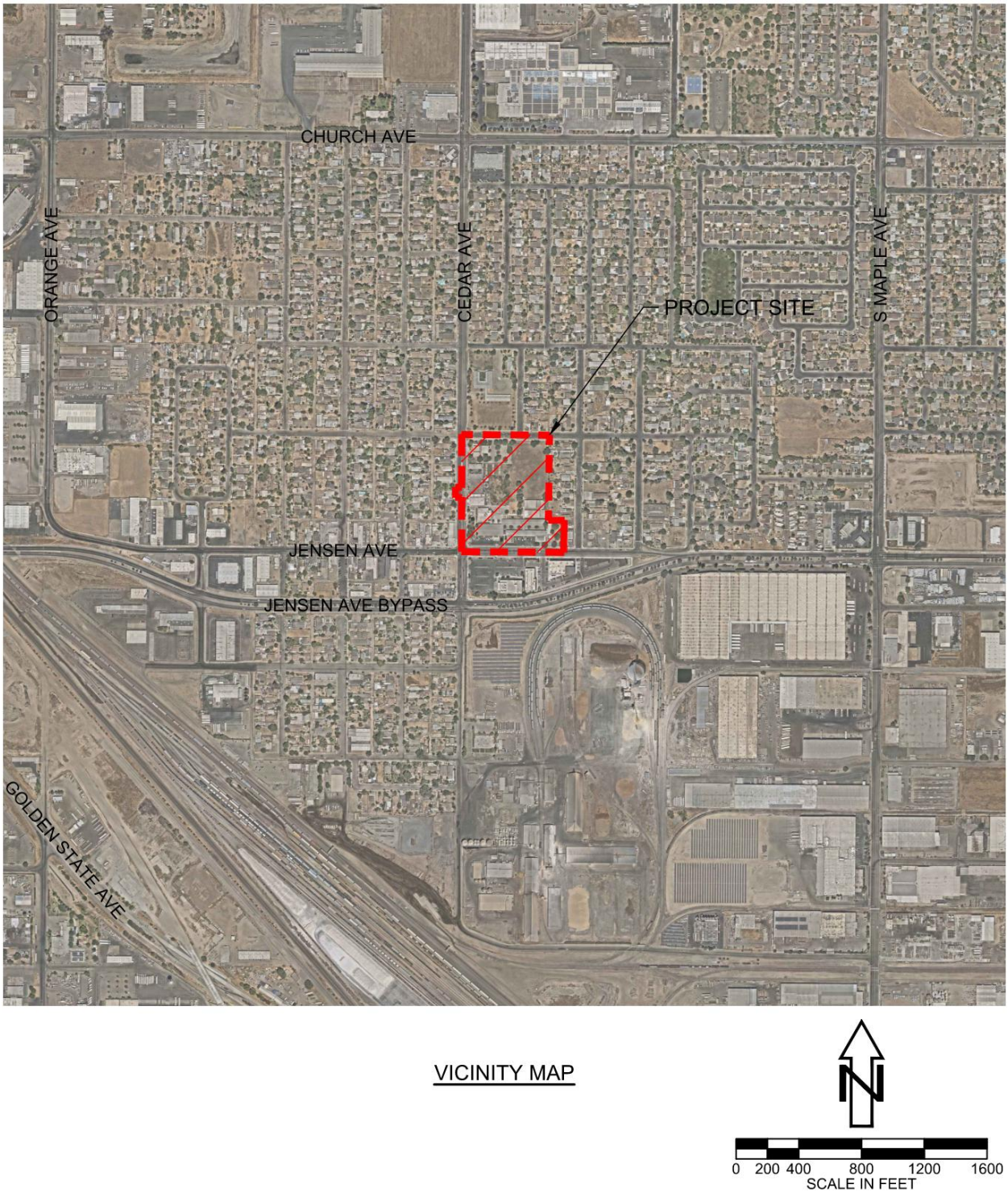


Figure 2: Vicinity Map showing an aerial image of the proposed project site within approximately a 0.75-mile radius around Calwa Elementary School and surrounding land uses. The site is located northeast of the intersection of Jensen Avenue and Cedar Avenue. Residential land uses are to the north, east, west, and southwest, while industrial uses are to the south and southwest. Railroads and Golden State Avenue are located in the southwest.

FIGURE 3: PROJECT SITE

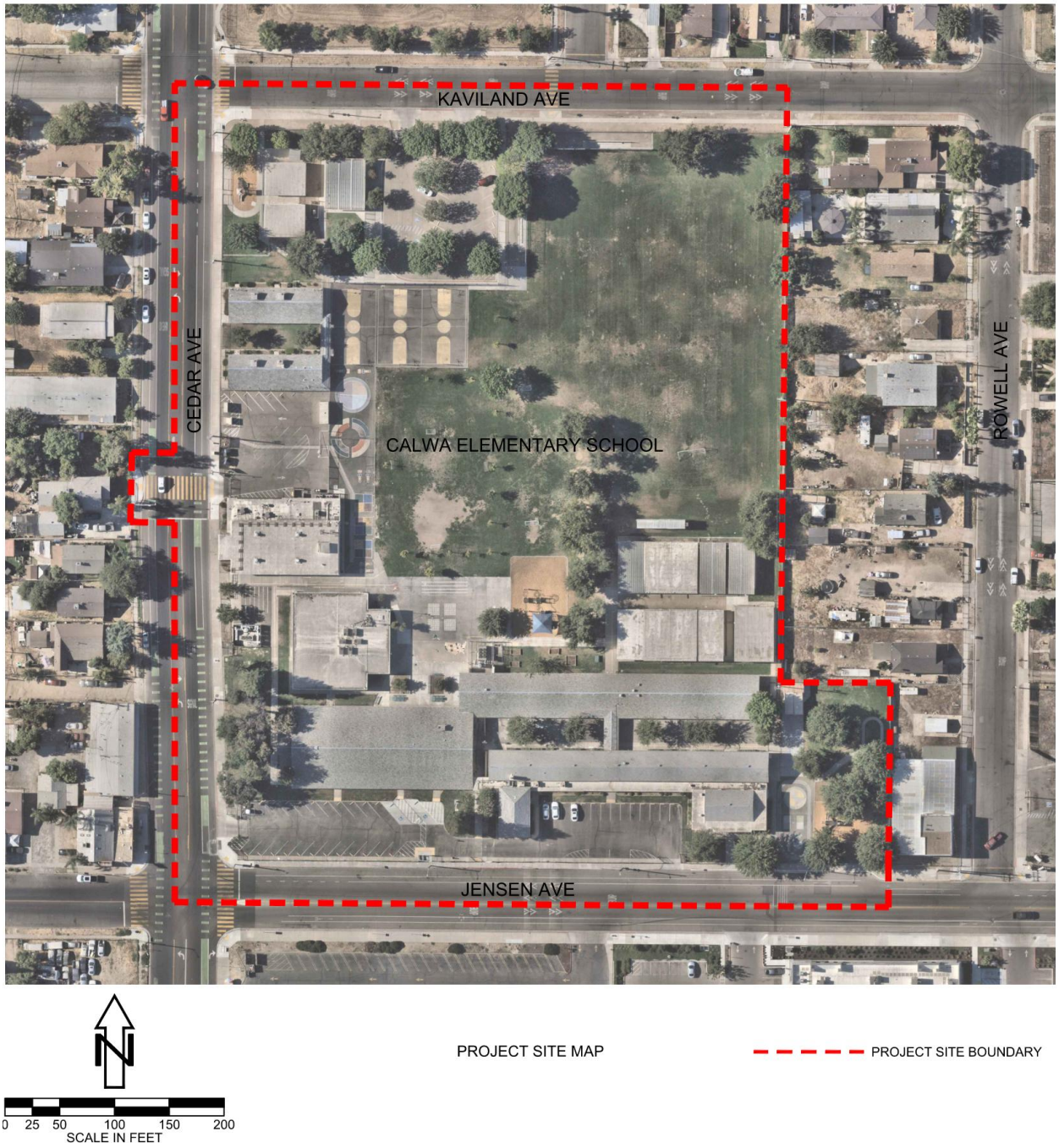


Figure 3: Project Site showing an aerial image of Calwa Elementary School with the project boundary outlined in red. The property is bounded by Kaviland Avenue to the north, Cedar Avenue to the west, Jensen Avenue to the south, and single-family homes along Rowell Avenue to the east. The image shows school buildings of various sizes, parking lots, play fields, athletic courts, and play structures. A small section of the boundary extends west to include an existing traffic signal and crosswalk across Cedar Avenue.

2.4 Existing Site Characteristics

The project site is an active elementary school and preschool campus containing permanent buildings constructed between 1945 and 1970. The campus currently serves approximately 537 students and consists of ten permanent buildings and thirteen one-story portable classroom buildings, for a total of approximately 57,340 square feet. Existing facilities and their corresponding square footage are summarized below:

- Classroom Buildings C and D, constructed in 1945; 9,110 square feet.
- Building J (also referred to as "Library"), constructed in 1945; 1,140 square feet.
- Building G (also referred to as "Multi-Purpose Room" [MPR]), constructed in 1947; 6,720 square feet.
- Classroom Buildings E and F, constructed in 1949; 4,040 square feet.
- Classroom Buildings A and B, constructed in 1957; 7,450 square feet.
- Classroom Building H, constructed in 1963; 8,950 square feet.
- Classroom Building I, constructed in 1970; 6,280 square feet.
- Ten Portable Classroom Buildings P1 through P10; 10,300 square feet.
- Three Portable Classroom Buildings P11 through P13 used for a preschool; 3,350 square feet.

Other campus features include grass playfields, a ballfield backstop, blacktop play courts and basketball courts, playground equipment, concrete walkways, parking areas (with a total of 88 on-site parking stalls), landscaped spaces, and associated infrastructure and utilities. The existing buildings exhibit age-related deficiencies in classroom layout, building systems, accessibility, environmental quality, and energy efficiency, and have exceeded their useful service life. A diagram of the existing campus is provided in Figure 4.

2.4.1 Historic Era Buildings

The school campus has occupied its current location since 1913. Buildings constructed prior to 1945 have since been removed. The project would demolish the Multi-Purpose Room (MPR), which was constructed in 1947 and designed by Franklin and Simpson. The MPR represents a distinctive example of mid-century modern educational architecture (Hattersley-Drayton, 2026) (See Appendix C). The project would also remodel three historic buildings, which include Classroom Buildings C and D (which together comprise a single historical resource) and the Building J ("Library"). These buildings were constructed in 1945, designed by architect William D. Coates, and retain a high degree of historic integrity (Hattersley-Drayton, 2026).

A more detailed description of these resources is provided in Section 4.2, *Historic Architectural Resources*.

2.5 Proposed Project Description

The District proposes to use Measure H bond funds to implement the Calwa Elementary School Reconstruction Project. The project would involve the phased demolition, reconstruction, and modernization of campus facilities to replace or improve buildings that no longer meet current building codes, accessibility, and educational standards. Construction would occur while the campus remains operational.

The project would not increase student enrollment or site capacity. The existing campus layout is shown in Figure 4, and conceptual phased site plans are provided in Figures 5 through 9. These figures illustrate the general scale, scope, and intent of the project; however, the final design may vary during subsequent design development.

2.5.1 Proposed Improvements

The District proposes to reconstruct and modernize the campus with new facilities and site improvements. The project would include, approximately, the following:

- A 11,320-square-foot multi-purpose room (MPR) building;
- A 4,035-square-foot administration building;
- A 16,200-square-foot early learning building;
- A 39-stall parking lot with a parent drop-off/pick-up loop at the northwest corner of the campus, with access from Cedar Avenue and exit to Kaviland Avenue;
- A 34-stall staff parking lot in the southeastern portion of the campus fronting Jensen Avenue;
- Conversion of Building I to a library (approximately 6,330 square feet) through interior modernization;
- Interior renovations to Buildings A, B, C, D, H, and J (Library), including fire and security alarm upgrades;
- Fire and security alarm upgrades to portable buildings P1 through P10;
- Replacement and/or reconfiguration of paved play areas, playground equipment, backstop, and turf playfields;
- Parking lot and sidewalk improvements to the existing south parking lot (south of Buildings C and D) to convert to a bus drop off parking lot
- Installation of on-site solar photovoltaic panels and battery storage systems, as required by the 2025 California Building Standards Code; and
- Installation of electric vehicle (EV) charger-equipped parking stalls and EV-capable infrastructure, consistent with the 2025 California Building Standards Code.

The proposed reconstructed/modernized site would include a total of approximately 74,680 square feet of total building space but would not increase student capacity or enrollment. Approximately 25 existing parking stalls would be retained, resulting in a total of approximately 98 on-site parking stalls. These improvements describe the anticipated scope and intent of the project; however, specific design details may be refined during final design.

All new and renovated facilities would be designed and constructed in accordance with the 2025 California Building Standards Code and applicable Division of the State Architect (DSA) requirements. The project would incorporate applicable standards for energy efficiency, water conservation, seismic and fire safety, indoor environmental quality, accessibility, and drought-tolerant landscaping.

2.5.2 Possible Off-Site Improvements

Modifications to campus access points, parking facilities, and internal circulation could require improvements within the surrounding public right-of-way. Such improvements may include the construction of new drive approaches and the removal or closure of existing drive approaches. Any off-site improvements would be subject to review and approval by the City of Fresno and/or County of Fresno and would be designed in accordance with applicable safety, access, and traffic engineering standards.

Additional off-site improvements could include, but would not be limited to, updated signage, pavement striping, crosswalk enhancements, traffic-calming measures, and bicycle or pedestrian facility improvements. The specific type, location, and extent of any off-site improvements would be determined during subsequent engineering design, agency review, and permitting processes.

Implementation of the project could also require new, upgraded, relocated, or replacement utility connections within the public right-of-way adjacent to the campus.

2.5.3 Construction Phasing and Schedule

Construction would be completed in two partially overlapping phases to allow continued school operations during an approximately 15-month construction period, anticipated from June 2028 through August 2029. Construction activities would generally occur Monday through Friday between 7:00 a.m. and 5:00 p.m.

Phase 1a: Interim Facilities and Building Renovation (June 2028 to August 2028)

The initial sub-phase, Phase 1a, would occur between June 2028 and August 2028 during summer break to complete critical improvements while school is not in session, so that the campus is prepared for instruction in mid-August 2028. Sub-phase 1a would include clearing of vegetation and paving in the central campus area to construct an approximately 7,240-square-foot interim path of travel, and installation of prefabricated interim MPR (approximately 1,930 square feet) and kitchen (approximately 1,450 square feet) facilities, totaling 0.24 acres of land disturbance.

This sub-phase would also include interior modernization of Building I for library use, renovations to Buildings A, B, C, D, H, and J (totaling approximately 28,300 square feet), and fire and security alarm upgrades for permanent and portable buildings (P1 through P10).

A diagram of sub-phase 1a can be seen Figure 5.

Phase 1b: Building Demolition and Reconstruction (June 2028 to August 2029

Sub-phase 1b would construct all the new buildings of the proposed project between June 2028 and August 2029. This sub-phase would include demolition of the existing 6,322 square-foot Building G (MPR); construction of the new 11,320 square-foot MPR, 4,035 square-foot administration, and 16,200 square-foot early learning buildings; and approximately 33,620 square feet of concrete improvement, 5,400 square feet of landscaped areas, 7,250 square feet of asphalt play court, and 2,640 square feet of play structure.

The construction area would disturb approximately 1.7 acres. See Figure 6.

Phase 2a: North and Southeast Campus Demolition (June 2029 to July 2029)

Sub-phase 2a would include demolition of Buildings E and F (approximately 4,040 square feet), portable buildings P11 through P13 (approximately 3,360 square feet), removal of interim MPR and kitchen facilities, and demolition and clearing of the existing hardscape and landscape areas in the north and southeast of the campus.

This sub-phase would disturb approximately 3.86 acres. See Figure 7.

Phase 2b: North and Southeast Campus Reconstruction (July 2029 to August 2029)

Sub-phase 2b would include construction of the northwest parking lot and drop-off loop (approximately 27,770 square feet of asphalt, 7,740 square feet of landscaping), as well as redevelopment of the northern campus area into a play area with an asphalt play court (approximately 22,610 square feet), a play structure (approximately 3,400 square-feet), and a turf playfield (approximately 50,000 square feet) with a backstop.

A 34-stall staff parking lot would be constructed along Jensen Avenue in the southeastern portion of the campus (approximately 11,500 square feet of asphalt, 3,360 square feet of landscaping, and 3,040 square feet of concrete). The existing south parking lot would be converted to a drop-off area through reconstruction of approximately 4,730 sq. ft. of asphalt, 1,360 sq. ft. of concrete, and 1,700 sq. ft. of landscaping.

This sub-phase would disturb approximately 4.04 acres. See Figure 8.

2.5.4 Utilities and Infrastructure

- Water and Sewer: Service would be provided by the City of Fresno.
- Storm Drainage: Stormwater runoff would be managed through Fresno Metropolitan Flood Control District (FMFCD) facilities. Runoff would be conveyed via on-site inlets and underground piping to existing storm drain infrastructure or directed to curb-and-gutter systems.
- Electricity and Natural Gas: Service would be provided by Pacific Gas and Electric Company (PG&E).
- Telecommunications: Service would be provided by American Telephone and Telegraph Company (AT&T) within the Kaviland Avenue and/or Cedar Avenue rights-of-way.

2.5.5 Project Management, Operations, and Maintenance

During construction, the school would continue operating for its existing student population. The District would continue regular instructional activities, extracurricular programs, and routine facility maintenance throughout the construction period.

Implementation of the project would modify existing circulation patterns on and around the campus. Most notably, the primary student entrance would be relocated from Jensen Avenue to Cedar Avenue, approximately mid-block between Kaviland and Jensen Avenues. The new entrance would be integrated with the proposed northwest student parking lot, drop-off loop, and revised perimeter fencing and gate configuration. As a result, parents and guardians dropping off students, as well as students walking or bicycling to school, would primarily access the campus from Cedar Avenue and enter through the new main entrance. This proposed northwest parking lot would replace the existing northwest preschool and preschool parking lot which is proposed for demolition.

The project would also construct a new on-campus bus loading and unloading loop along the southern portion of the campus. This improvement would relocate school bus operations from the existing on-street loading area on Jensen Avenue to a dedicated facility within the school grounds.

The existing staff parking areas located along Cedar Avenue and near the south-central portion of the campus adjacent to Jensen Avenue would be removed. These parking facilities would be consolidated into a new staff parking lot located in the southeast corner of the campus.

FIGURE 4: EXISTING PROJECT SITE DIAGRAM

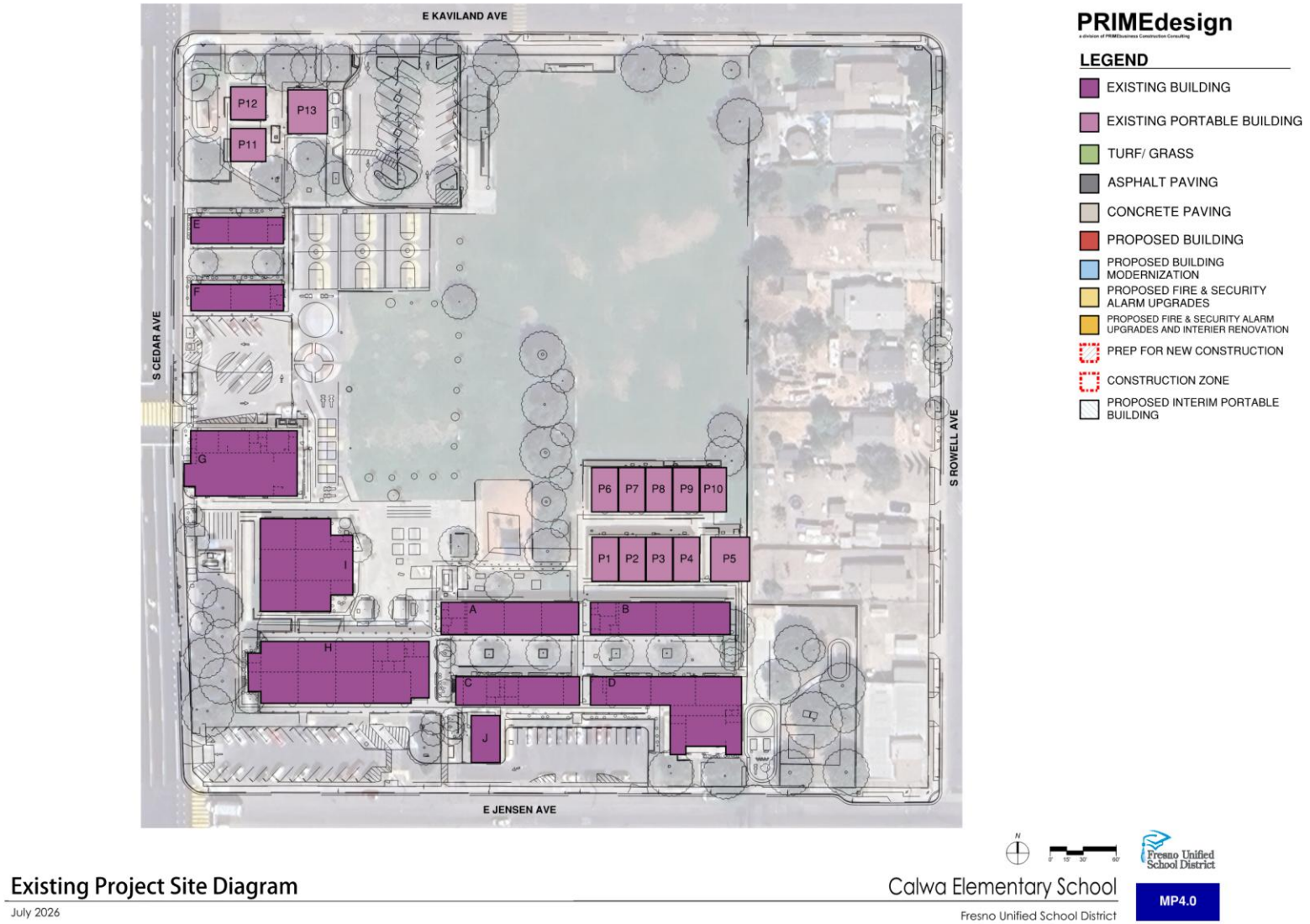


Figure 4: Existing Project Site Diagram showing Calwa Elementary School campus layout. The south portion includes eight permanent buildings (A, B, C, D, G, H, I, and J) and ten portable buildings (P1–P10), with surrounding concrete areas, play structures, landscaping, and a parking lot along Jensen Avenue. The northwest corner has two permanent buildings (E and F), three portable buildings (P11–P13), and parking lots along Cedar Avenue and Kaviland Avenue, plus asphalt play courts. The northeast corner features a grass playfield for soccer and baseball.

FIGURE 5: PROPOSED CONCEPTUAL PHASE 1A SITE MAP

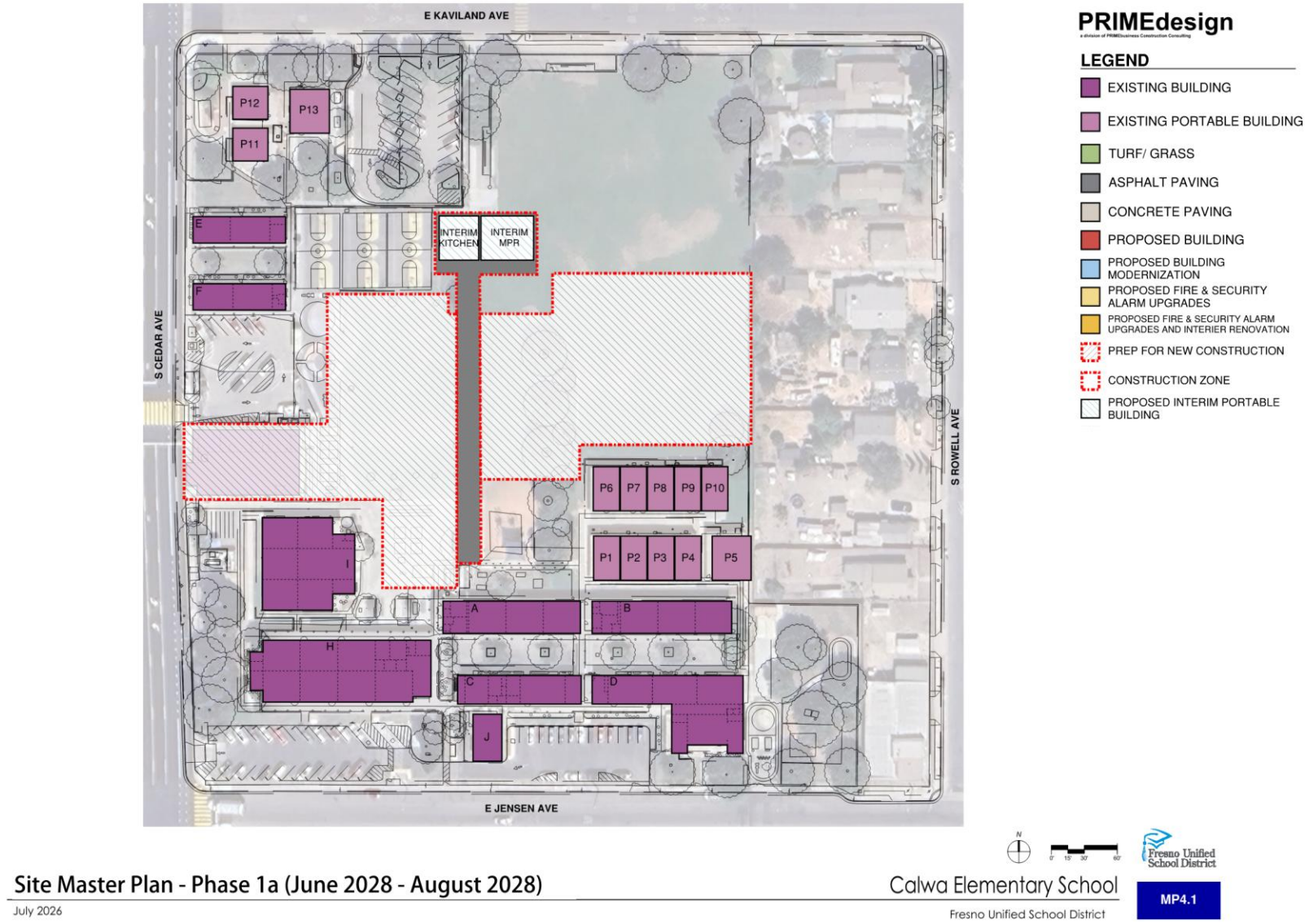


Figure 5: Proposed Phase 1a Site Map shows a diagram of the existing campus, but the center of the campus marked for construction. This construction area includes demolition of Building G and construction of an interim path of travel connecting the south campus to the north campus, cutting through the construction zone, and interim kitchen and MPR buildings in the north of the campus.

FIGURE 6: PROPOSED CONCEPTUAL PHASE 1B SITE MAP

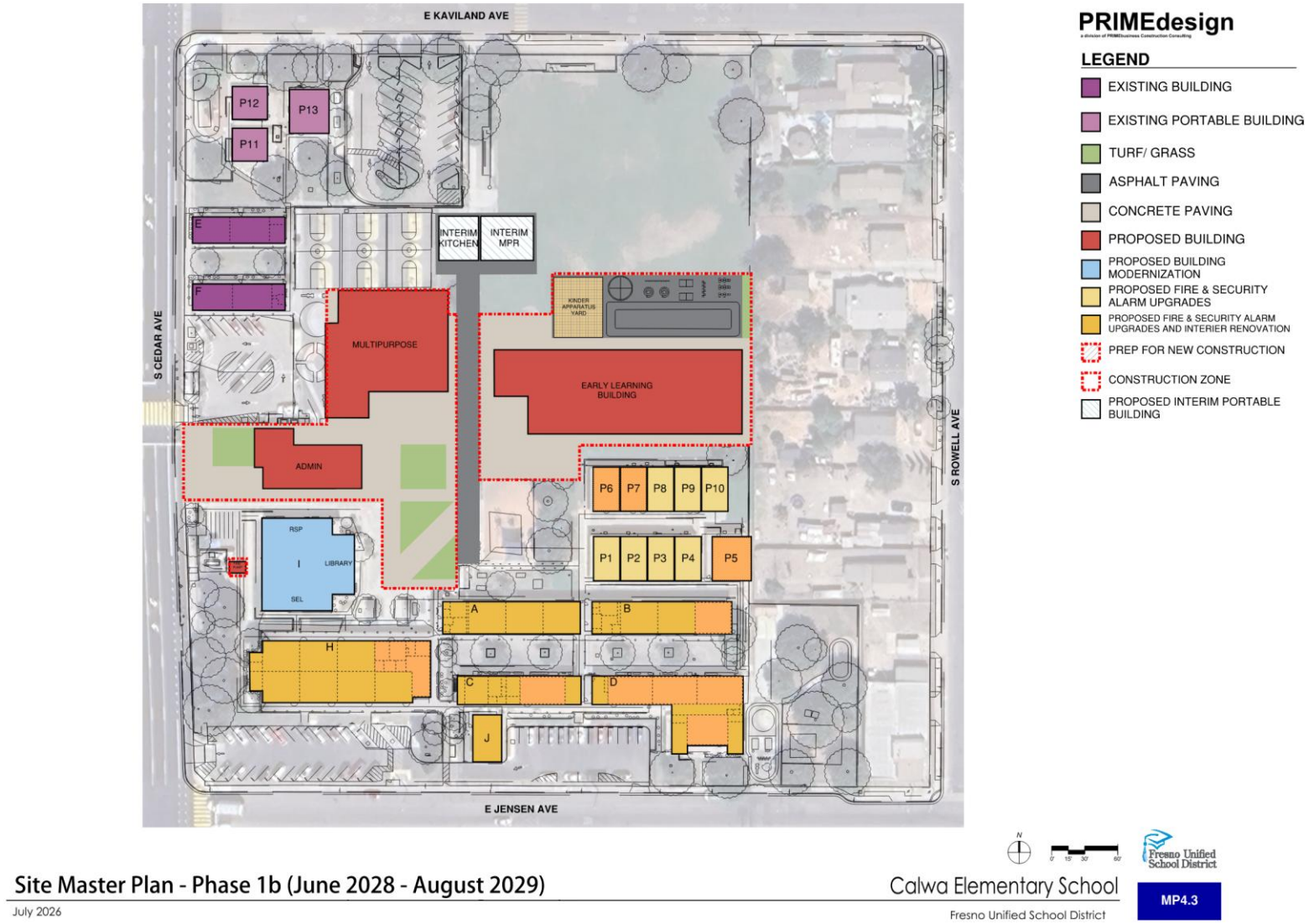


Figure 6: Proposed Phase 1b Site Map showing Calwa Elementary School campus with the Phase 1a interim path of travel, kitchen, and MPR buildings in completed. The center construction area shows three proposed buildings: Admin, Multipurpose, and Early Learning. Other improvements in the center construction area include concrete, landscape, a plat structure, and asphalt play courts. Existing buildings in the south of the campus are marked for modernization, renovation, and fire and security alarm upgrades.

FIGURE 7: PROPOSED CONCEPTUAL PHASE 2A SITE MAP

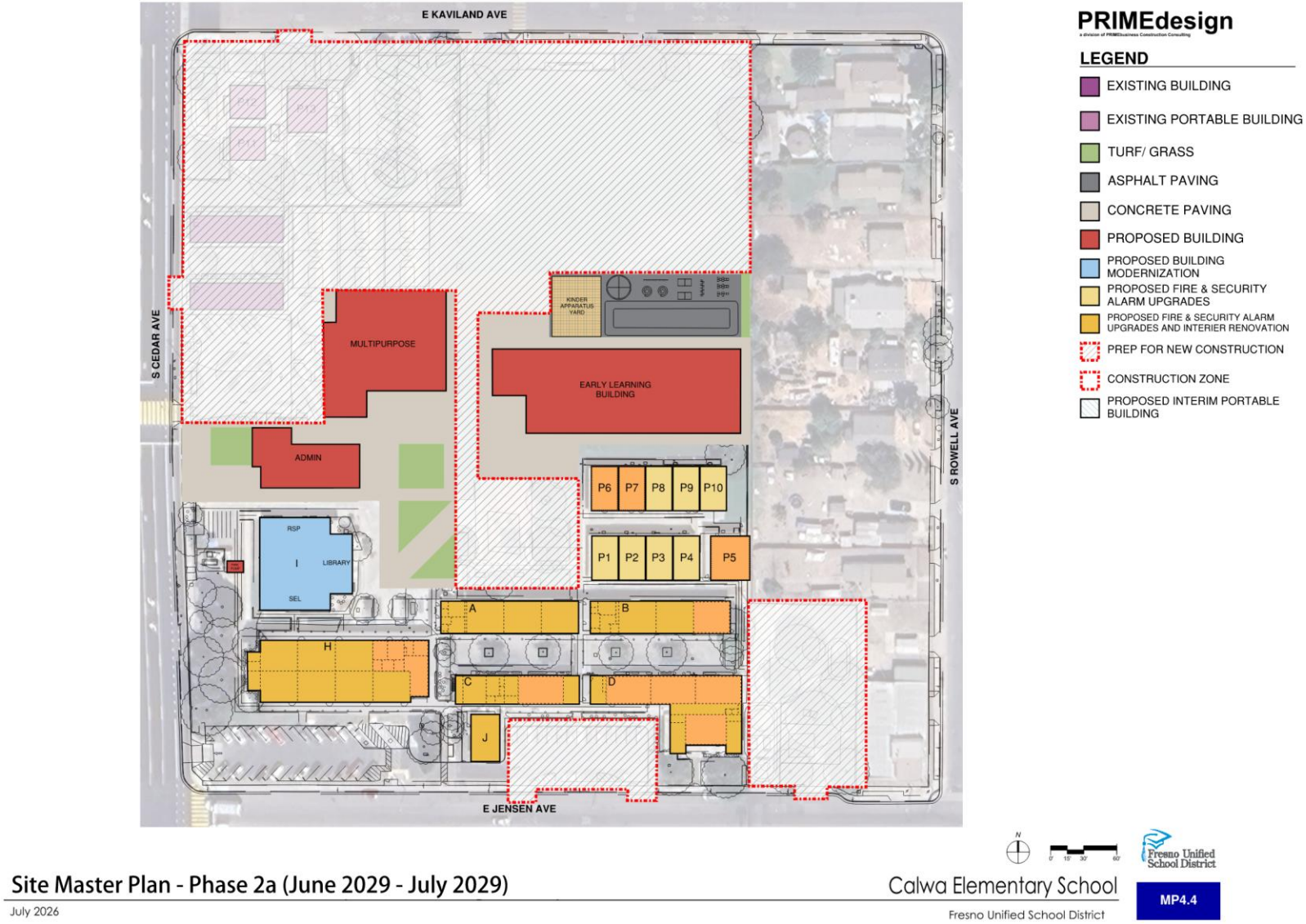


Figure 7: Proposed Phase 2a Site Map showing Calwa Elementary School campus with the Phase 1b improvements of new buildings and facilities in the center of the campus in place, and areas marked for construction in the north, part of the center, a part of the south, and the southeast corner of the campus. Existing Buildings E, F, and P11, P12, and P13, hardscape, and landscape areas are marked for demolition.

FIGURE 8: PROPOSED CONCEPTUAL PHASE 2B SITE MAP

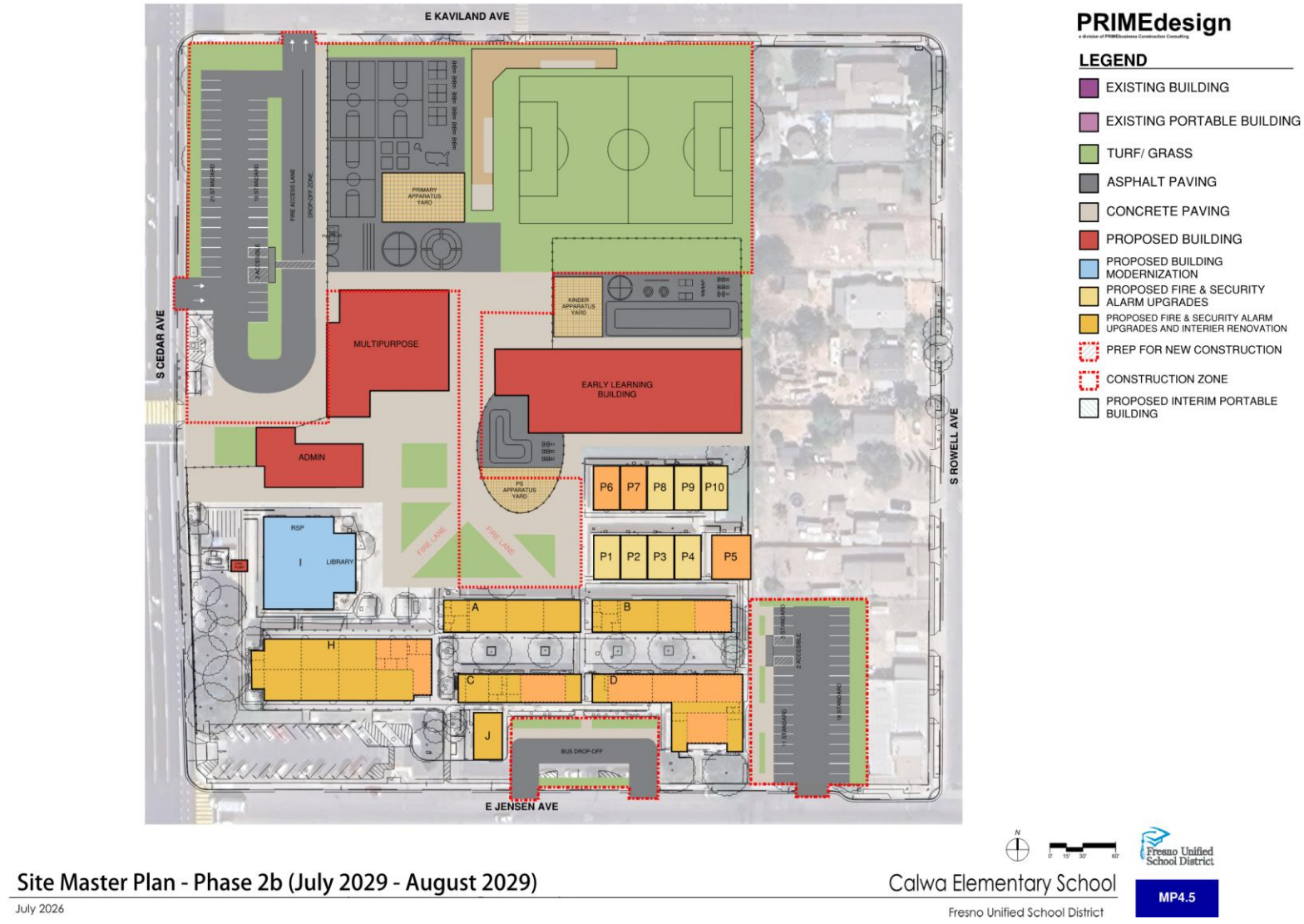


Figure 8: Proposed Phase 2b Site Map showing Calwa Elementary School campus with the Phase 1b improvements of new buildings and facilities in the center of the campus in place, and new site improvements shown in the construction areas in the north, part of the center, part of the south, and the southeast corner the campus. New Improvements include a parking lot and drop-off loop in the northwest, new play court, play structure, and athletic field in the north, a play structure in the center, a bus drop-off loop in the south, and a staff parking lot in the southeast.

FIGURE 9: PROPOSED CONCEPTUAL FINAL SITE MAP

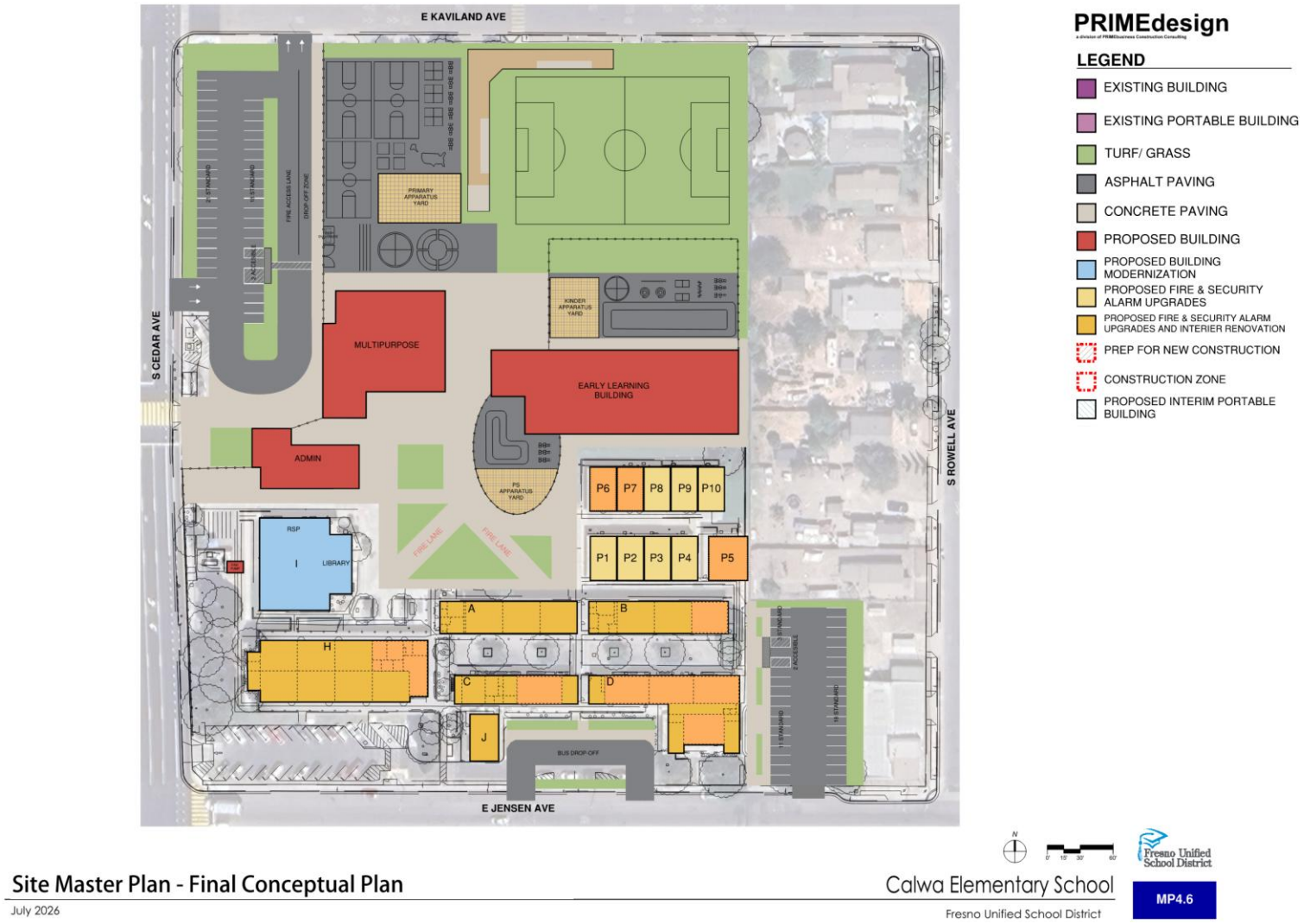


Figure 9: Proposed Conceptual Final Site Map showing the reconstructed Calwa Elementary School campus. The final site includes a parking lot and drop off loop in the northwest, new play courts, a play structure, and playfield in the north and northeast. In the center of the campus, three new buildings area shown: Admin, MPR, and Early Learning, where Early Learning has an enclosed play area. Existing buildings in the south of the campus remain in place, but marked as modernized, renovated, and having fire/security alarm upgrades. A new parking lot is shown in the southeast of the site, and the existing south parking lot is shown as a new bus drop-off loop.

2.6 Project Design Standards

2.6.1 State of California

The Division of the State Architect (DSA) is the primary agency responsible for establishing and enforcing design and construction standards for public K–12 school facilities in California. All new school construction must comply with the California Building Standards Code (Title 24 of the California Code of Regulations. For the proposed project, DSA requires compliance with the 2025 California Building Standards Code, including the following applicable parts:

- Part 1 – California Administrative Code, which establishes DSA administrative procedures, plan review protocols, and certification requirements
- Part 2 – California Building Code (CBC), governing structural safety, fire and life safety, accessibility, and architectural design
- Part 3 – California Electrical Code, regulating electrical systems and equipment design
- Part 4 – California Mechanical Code, addressing HVAC system design and performance
- Part 5 – California Plumbing Code, governing potable water systems, sanitation, and related infrastructure
- Part 6 – California Energy Code, establishing mandatory energy-efficiency requirements for lighting, mechanical systems, and building envelope performance
- Part 9 – California Fire Code, regulating fire and emergency safety requirements
- Part 11 – California Green Building Standards Code (CALGreen), which includes mandatory measures for indoor air quality, material conservation, water efficiency, MERV-13 filtration, and overall environmental performance
- Part 12 – California Referenced Standards Code, incorporating technical standards referenced throughout Title 24

Collectively, these components of Title 24 ensures that the reconstructed school meets current statewide standards for safety, sustainability, accessibility, and energy efficiency, in compliance with DSA review and approval.

2.6.2 City of Fresno

Public schools serve a statewide governmental function and are authorized by state law. Under the principle of state preemption, local zoning ordinances cannot interfere with the State's responsibility to provide public education. Accordingly, public school facilities are not subject to local zoning regulations, although they coordinate with local jurisdictions and must comply with other applicable requirements, such as environmental review and building standards.

While the City of Fresno does not have authority to review or approve on-site school facility plans, the project would be coordinated and designed to comply with applicable City ordinances, standards, and off-site improvement requirements. This includes adherence to City regulations governing public streets, sidewalks, utilities, drainage, and work within the public right-of-way to ensure that off-site improvements are constructed in accordance with City specifications. Relevant City of Fresno requirements include, but are not limited to:

- **City of Fresno Noise Regulations (Fresno Municipal Code Chapter 10, Article 1)**, which establish allowable noise levels and operational limitations for construction and long-term activities.

- **City of Fresno Public Works Standard Specifications and Standard Drawings**, which apply to off-site roadway improvements, curb, gutter, sidewalk, ADA ramps, traffic control devices, and frontage improvements.

- **Encroachment Permit Requirements**, which govern any construction activities that occur within or impact the public right-of-way, including road cuts, trenching for utilities, or temporary traffic control during construction.

- **City of Fresno Water, Sewer, and Solid Waste Utility Standards**, which apply to new or upgraded off-site utility connections and require coordination with the Department of Public Utilities.

- **City of Fresno Stormwater and Grading Requirements**, including compliance with the City's grading ordinance, erosion control measures, and stormwater best management practices for construction activities that may affect public drainage systems.

- **City of Fresno Fire Department Access and Hydrant Requirements**, where applicable to off-site fire access routes or new hydrant placements located in the public right-of-way.

These requirements ensure that off-site project components, such as roadway frontage improvements, pedestrian facilities, traffic control elements, drainage tie-ins, and public utility connections, are implemented in accordance with City design and safety standards and remain compatible with the surrounding built environment.

2.6.3 Fresno Metropolitan Flood Control District

The Fresno Metropolitan Flood Control District (FMFCD) reviews proposed site development plans to ensure consistency with the Master Drainage Plan and applicable stormwater design standards. The review process begins with verification that all required submittal materials are complete, followed by a technical evaluation to confirm adequate drainage capacity, proper integration with existing infrastructure, and compliance with National Pollutant Discharge Elimination System (NPDES) water quality requirements. FMFCD would also coordinate with local agencies, establish conditions of approval, such as drainage fees or facility agreements, and issue approval once all requirements are met. Following construction, FMFCD would oversee implementation and enforcement of applicable post-development stormwater mitigation measures and agreements.

2.7 Actions Required to Implement the Project

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

- Plan Review and Approval from the Division of State Architects (DSA).
- Adopt and implement the Mitigation Monitoring and Reporting Program (MMRP) identified in Section F of this Initial Study.
- Approve the project.
- Submit a Notice of Intent (NOI) to the State Water Resources Control Board (SWRCB).
- Receive Indirect Source Review (ISR) Air Impact Assessment (AIA) approval letter from the San Joaquin Valley Air Pollution Control District (SJVAPCD)
- Receive Dust Control Plan (DCP) approval from the SJVAPCD.

2.8 Scoping

As the lead agency, the District determined that preparation of an Environmental Impact Report (EIR) is required for the project pursuant to Section 15082 of the State CEQA Guidelines. Accordingly, on March 20, 2026, the District distributed a Notice of Preparation (NOP) for the Calwa Elementary School Reconstruction Project EIR (State Clearinghouse No. 2026030919) to responsible agencies, trustee agencies, and other interested parties. To facilitate broad public participation, the Notice of Availability of the NOP was issued to the school community in English, Spanish, and Hmong.

The public review period for the NOP extended from March 20 through April 19, 2026. A public information/scoping meeting was held on April 9, 2026, at Calwa Elementary School (4303 E. Jensen Avenue, Fresno, CA 93725) to present information on the preliminary project and alternatives under consideration and to solicit input from the community. Translation services were provided at the meeting.

In response to the March 20, 2026, NOP, the District received five letters about the project summarized in Table 4, from the following agencies:

- California Department of Toxic Substances Control (DTSC)
- San Joaquin Valley Air Pollution Control District (SJVAPCD)
- Fresno Metropolitan Flood Control District (FMFCD)
- City of Fresno
- Native American Heritage Commission (NAHC)

TABLE 4: SUMMARY OF AGENCY COMMENTS LETTERS

Name of Agency	Topic	Comment
DTSC	California Education Code 17210, 17213.1 and 17213.2.	If California Department of Education (CDE) State funds will be used for project, investigate site for hazardous materials under DTSC oversight. If no State funds are used, then investigate the site under County oversight.
DTSC	Soil and Fill	Recommend all imported soil/fill be tested as outlined in DTSC's Preliminary Endangerment Assessment Guidance Manual.
SJVAPCD	Project Related Emissions	Utilize cleanest available off-road construction equipment. Model project construction and operational emissions using California Emission Estimator Model (CalEEMod).
SJVAPCD	Localized Diesel Particulate Matter	Recommended that a Screening Health Risk Assessment be completed to analyze potential health impacts on sensitive receptors.
SJVAPCD	Ambient Air Quality Analysis	Recommends ambient air quality analysis if project emissions exceed 100 pounds per day for any pollutant.

SJVAPCD	Air Quality Impacts from Lawn and Garden Equipment	Recommends FUSD consider SJVAPCD's Clean Green Yard Machines program for funding to replace existing gas-powered equipment.
SJVAPCD	On-site Solar Deployment	Suggests FUSD consider incorporating solar power systems.
SJVAPCD	Rule 2010, 2201, 9510, 4002, 4601, 4102, and 4641, and Regulation VIII	Provided guidance on various rules and regulations related to: stationary sources, indirect sources, architectural coatings, dust control, and paving operations.
FMFCD	Stormwater Runoff	Directs FUSD to comply with FMFCD's Storm Drainage and Flood Control Master Plan, pay drainage fees, mitigate runoff as needed, have site improvements reviewed by FMFCD, and store materials appropriately. Encourages roof drain disconnections
City of Fresno	Parking, Circulation and Safe Route to Schools	Requests analysis on parking supply, campus circulation/drop-off, and neighborhood traffic effects. Requests that the EIR include Safe Route to Schools analysis.
City of Fresno	Historical Resources	Requests analysis on whether the project will cause a substantial adverse changes to historic resources.
NAHC	Tribal Consultation	Recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of proposed project.

No comments were received from the April 9, 2026, information/scoping meeting. The NOP and agency letters are provided in Appendix A.

2.9 Areas of Controversy and Issues to be Resolved

The State CEQA Guidelines require that an EIR provides a list of issues that are likely to raise controversy and are of particular interest to the public. The following issues are most likely to produce controversy in reviewing and considering the project:

- Demolition of three buildings determined to be eligible for listing in the California Register of Historic Resources (CRHR);
- Air quality impacts from construction activities in AB 617 Community Air Protection Area;
- The presence of and potential exposure to hazardous materials from existing building materials and soil contamination.

2.10 Intended Uses of the EIR

The District is proposing to approve and carry out a discretionary project subject to Section 15378 of the State CEQA Guidelines. This EIR evaluates the potential impacts of implementing the project and proposes mitigation

measures to reduce impacts to less than significant where possible. Public agencies other than the District, including responsible and trustee agencies (as defined under CEQA), may use this EIR during their review of various permits and other discretionary actions. The following agencies might use this EIR for such purposes:

- Division of State Architects (DSA)
- City of Fresno
- County of Fresno
- San Joaquin Valley Air Pollution Control District (SJVAPCD)
- Fresno Metropolitan Flood Control District (FMFCD)

Discretionary approval may include applications for permit approvals, consultation requirements, or other required actions. Table 5 lists the regulatory agencies, permits, and purposes of the regulatory approvals that may apply to the project.

TABLE 5: APPLICABLE PERMIT AND REGULATORY REQUIREMENTS

Regulatory Agency	Law/Regulation	Purpose	Permit/Authorization
Division of State Architects	California Education Code; Title 24, California Building Standards Code	Ensures design and construction of K–12 school facilities meet structural safety, fire/life safety, and accessibility standards.	DSA Plan Review and Construction Approval; Certification of Compliance (DSA Closeout).
City of Fresno	Fresno Municipal Code; Building and Fire Codes; Grading Ordinance; Public Works Standards	Regulates local fire safety, utilities, and right-of-way improvements within city jurisdiction.	Building Permit; Grading Permit; Encroachment Permit; Fire Department Approval; Utility Connection Approvals.
County of Fresno	Fresno County Environmental Health Regulations; Health & Safety Code	Oversees public health protections related to hazardous materials and food service facilities.	Health Department Clearances.
San Joaquin Valley Air Pollution Control District	Regulation VIII (Fugitive Dust); Rule 9510 (Indirect Source Review); District Permitting Regulations	Ensure air quality protection, reduce construction emissions, regulates dust control, and mitigates indirect emissions from large projects.	Rule 9510 ISR Application/Approval; Dust Control Plan.
Fresno Metropolitan Flood Control District	FMFCD Development Review Requirements; Stormwater and Drainage Standards	Ensures adequate storm drainage capacity and compliance with regional flood control planning.	Drainage Plan Review/Approval; FMFCD Connection/Impact Fees.
State Water Resources Control Board (SWRCB)	Construction General Permit (NPDES); Porter-Cologne Water Quality Control Act	Regulates stormwater runoff from construction sites and protects surface and groundwater quality.	Notice of Intent (NOI) for Construction General Permit; Storm Water Pollution Prevention Plan (SWPPP); Waste Discharge Requirements (if triggered).
Native American Heritage Commission (NAHC)	Public Resources Code §5097.98; CEQA §21080.3.1–21080.3.2 (AB 52); PRC §21083.2 (Tribal Cultural Resources)	Protects tribal cultural resources and governs required consultation with tribes prior to project approval.	NAHC Sacred Lands File Search; AB 52 Tribal Consultation Process Completion; Treatment and Disposition Procedures for inadvertent discoveries.

Chapter 3 Affected Environment

3.1 Overview

The DEIR and the discussions presented in this chapter have been prepared in accordance with the scoping process provided for in PRC Section 21080.4(a) and State CEQA Guidelines Section 15082. This process relied on the NOP circulated by the District and the responses received from responsible and trustee agencies. CEQA-required environmental topics not identified through the scoping process as requiring detailed analysis have not been omitted; rather their discussion has been appropriately limited to information necessary for environmental review.

The District published the NOP on March 20, 2026, with a public commenting period ending on April 19, 2026 (see Appendix A). Additionally, a public scoping meeting to assist in the determination was duly noticed and held by the District on April 9, 2026.

Each topical or technical section in Chapter 3 begins with an introduction that explains the issues to be evaluated; provides a general summary of comments received on the NOP, if any; and identifies the primary sources reviewed to prepare the analysis. The introduction is followed by a description of the project's environmental and regulatory settings as they pertain to a particular issue. The regulatory setting provides a summary of applicable federal, State, and local regulations, plans, policies, and laws that are relevant to each issue area. The regulatory setting description in each section is followed by a discussion of project-specific impacts. Compliance with applicable laws, policies, and regulations is assumed and is identified in the impact analysis. In many cases, compliance with applicable laws, policies, or regulations would reduce the significance of an impact.

3.2 Environmental Setting

According to Section 15125(a) of the State CEQA Guidelines, an EIR must include a description of the existing physical environmental conditions in the vicinity of the project as they exist at the time the NOP was published on March 18, 2026.

The following discussion describes the regional physical setting of the project area. This setting, also known as the "environmental setting," normally constitutes the baseline condition against which project-related impacts are compared. Therefore, the baseline condition for this DEIR, unless noted otherwise, is based on conditions that existed when the NOP was published. The State CEQA Guidelines recognize that the date for establishing an environmental baseline cannot be rigid. Because physical environmental conditions may vary over a range of time, the use of environmental baselines that differ from the date of the NOP is reasonable and appropriate in certain circumstances when doing so results in a more accurate or conservative environmental analysis.

3.2.1 San Joaquin Valley

The project area is located within the low alluvial plains and alluvial fans of the central San Joaquin Valley, positioned between the Coast Ranges to the west and the Sierra Nevada to the east. The San Joaquin Valley extends approximately 400 miles in length and averages 50 miles in width, encompassing nearly 20,000 square miles. Geologically, the valley forms a large asymmetric trough bounded by the granitic Sierra Nevada and the metamorphic rocks of the Coast Ranges. This trough has been filled with substantial quantities of sediment, up to 30,000 feet in the southern San Joaquin Valley and as much as 60,000 feet in the Sacramento Valley to the north, ranging in age from the Jurassic to the Holocene and consisting of both marine and lacustrine deposits.

In addition to its distinctive geologic setting, the San Joaquin Valley is characterized by some of the most challenging air quality conditions in California. The surrounding mountain ranges create a basin that traps air masses, limiting ventilation and allowing pollutants to accumulate. Temperature inversions, limited rainfall, and high summertime temperatures further contribute to elevated concentrations of ozone and fine particulate matter ($PM_{2.5}$). As a result, the region is designated nonattainment for multiple state and federal ambient air quality standards, and air quality management is a central environmental consideration for development within the valley.

3.2.2 South-Central Fresno Community Air Protection Area

Assembly Bill 617 established the Community Air Protection Program to reduce air pollution in California's most heavily burdened and disadvantaged communities through localized emissions monitoring, community-driven planning, and targeted pollutant-reduction strategies. Under this framework, CARB and local air districts prepare Community Air Monitoring Plans (CAMPs) and Community Emissions Reduction Programs (CERPs) that identify priority sources, vulnerable receptors, and emission-reduction measures informed directly by community steering committees. These plans provide enhanced monitoring data, community-identified priorities, and exposure-reduction strategies that are relevant to CEQA because they supply fine-scale information on localized air quality conditions and establish community-specific goals against which project consistency can be evaluated.

South Central Fresno, including the Calwa community, is one of the state's designated AB 617 communities due to its high cumulative pollution burden, proximity to major highways and industrial facilities, and concentration of sensitive receptors such as schools and childcare centers. The South-Central Fresno CERP, prepared by SJVAPCD, outlines a suite of community-prioritized actions, including truck rerouting, indoor air-filtration improvements, and exposure-reduction measures to address elevated $PM_{2.5}$, NO_X, and DPM levels. The CAMP provides monitoring data that identify localized hotspots and inform impact assessments. For projects within Calwa or the South-Central Fresno AB 617 boundary, CEQA analyses must consider these localized conditions and evaluate whether a project would support or conflict with CERP strategies, contribute to cumulative community pollution burdens, or introduce new transportation-related or industrial emission sources in overburdened areas (SJVAPCD, 2019).

3.2.3 Project Vicinity

The project site is located within the City of Fresno and is bordered to the west by the unincorporated community of Calwa in Fresno County. Land uses within approximately a 0.5-mile radius are predominately residential to the north, east, west, and southwest, with industrial uses located to the southeast. At a broader scale of 2.5-mile, the surrounding land use pattern transitions to more extensive industrial development to the south, southwest, and southeast. The project site is also situated near a major freight and transportation corridor with the BNSF and Union Pacific rail lines lie approximately 0.4 miles to the southwest, State Route 99 is located about 0.85 miles to the southwest, and State Route 41 is located approximately 1.7 miles to the west.

3.2.4 Study Area

The site is approximately 10 acres in size, including the 7.89-acre existing Calwa Elementary School campus, and approximately 1.11 acres of surrounding City of Fresno sidewalk and street right-of-way. The existing campus is located at 4303 East Jensen Avenue, Fresno, California 93725 (APN 480-351-27T). The school currently serves approximately 537 students in ten permanent buildings and thirteen portable classroom buildings totaling 57,340 square feet, originally constructed between 1945 and 1970. Buildings are clustered in the south and west perimeters of the site, with play courts, fields, and structures in the center, and an athletic field in the northeast corner. Parent/student parking (37 stalls) is located in the south with entrances to Jensen Avenue and Cedar

Avenue. A bus and student loading zone is located along Jensen Avenue. A staff and delivery/loading parking lot (12 stalls) is located on the west perimeter facing Cedar Avenue. A preschool and staff parking lot (27 stalls) is located in the north with entrances to Kaviland Avenue.

The existing buildings exhibit age-related deficiencies in classroom configuration, infrastructure, accessibility, environmental quality, and energy performance, and have exceeded their useful life.

a) Existing Land Uses
The project site is an existing elementary school campus, Calwa Elementary School.

b) Public Land Use Policies
The project is in the City of Fresno. The City of Fresno's land use policies include the City of Fresno General Plan (City of Fresno, 2014) and its zoning ordinance, Chapter 15 – Citywide Development Code, Including Revisions of the Fresno Municipal Code.

c) Zoning
The project is zoned as Public and Institutional (PI).

d) Public Utilities and Services
The City of Fresno provides most public utilities, including Water, Wastewater, and Solid Waste Management. The Pacific Gas & Electric Company (PG&E) provides gas and electricity, and Fresno Metropolitan Flood Control District provides stormwater drainage services to the project site.

e) Climate
The climatic conditions of the project are typical of the central San Joaquin Valley, consisting of hot, dry summers and mild, wet winters, characteristic of a Mediterranean climate. The local meteorology of the area is represented by measurements recorded by the National Weather Service. The project site is situated in the City of Fresno. The region experiences a semi-arid climate, with an average annual precipitation of 10.89 inches. Temperatures fluctuate from their average lower temperature in January of 37.6°F to an average higher temperature in July at 98.3°F (Western Regional Climate Center, 2025).

f) Police and Fire
The project area is served by the City of Fresno Police Department, and the City of Fresno Fire Department.

g) Transit
The project area is served by Fresno Area Express (FAX). Bus Route 38 is located adjacent to the campus on Cedar Ave.

3.3 Regulatory Setting

The following discussion describes the regulatory and jurisdictional setting of the proposed project.

3.3.1 Division of State Architects

As the state agency responsible for design and construction oversight of public K–12 school facilities, the Division of the State Architect (DSA) exercises jurisdiction over structural safety, fire and life safety, and accessibility compliance. DSA authority derives from the Field Act, which requires that all public-school construction plans be

prepared by licensed design professionals and approved by DSA prior to construction. DSA ensures that school projects meet the structural, seismic, and accessibility standards contained in Title 24 of the California Building Standards Code and provides independent construction inspection and certification to verify that the project is built in accordance with approved plans (Division of State Architects, n.d.).

3.3.2 California Department of Education

For this locally funded school redevelopment project, the California Department of Education (CDE) does not exercise direct approval authority over site acquisition or facility design because CDE's mandatory site and plan approval procedures apply specifically to state-funded school projects. Under Title 5 of the California Code of Regulations, CDE approval is required before a state-funded district may acquire a school site or advance preliminary and final construction plans; however, these requirements do not apply to district projects financed solely with local funds. Although CDE publishes facility standards and site selection guidance intended to promote educational appropriateness and student safety, these standards serve as best practices rather than binding requirements for locally funded projects. As such, CDE acts as an advisory resource, but it does not hold jurisdiction or permitting authority over this project (California Department of Education, 2025).

3.3.3 City of Fresno

Although school facilities are not subject to City of Fresno building plan review, the City retains jurisdiction over all improvements constructed within the public right-of-way. As such, the City of Fresno would review and approve off-site components of the project, including driveway approaches, sidewalks, curb and gutter modifications, frontage improvements, traffic control features, and utility connections to City-owned water and sewer systems. These activities require compliance with the City's Public Works Standards, municipal code requirements governing street and utility work, and any necessary encroachment or excavation permits. The City also oversees traffic safety elements associated with school access, including sight-distance compliance, pedestrian pathway continuity, and any intersection improvements adjacent to the project site. Accordingly, while the City does not exercise authority over on-site building design or construction, it remains the approving and permitting agency for all project elements located within or affecting the public right-of-way.

3.3.4 County of Fresno

In addition, the Environmental Health Division functions as Fresno County's Certified Unified Program Agency (CUPA) for hazardous materials and hazardous waste, providing regulatory oversight related to potential soil contamination that may be encountered during redevelopment activities (County of Fresno, n.d.).

For any on-site food service (e.g., a school kitchen or cafeteria), the County's Environmental Health Division serves as the local enforcement agency for the California Retail Food Code (CalCode) and requires a Permit to Operate, routine inspections, and plan review for new or remodeled food facilities. The County's Consumer Food Program regulates and inspects school cafeterias, and other retail food facilities, issuing permits to ensure safe design, equipment, and operational standards (County of Fresno, n.d.). In addition, the Environmental Health Division functions as Fresno County's Certified Unified Program Agency (CUPA) for hazardous materials and hazardous waste, providing regulatory oversight related to potential soil contamination encountered during redevelopment activities (County of Fresno, n.d.).

3.3.5 Fresno Metropolitan Flood Control District

The Fresno Metropolitan Flood Control District (FMFCD) has jurisdiction over regional stormwater management and flood control infrastructure within its service area, including the City of Fresno and the project site. FMFCD reviews development proposals to ensure that storm drainage facilities are properly designed, sized, and integrated with the regional system. This review includes evaluation of proposed grading, drainage, and stormwater conveyance improvements for consistency with FMFCD's Development Review Requirements and applicable master drainage plans, as well as confirmation of adequate system capacity and connectivity.

Projects that require new or modified drainage facilities must obtain FMFCD approval of drainage plans and pay applicable drainage connection or impact fees, which support the operation, expansion, and long-term maintenance of regional infrastructure. Compliance with these requirements helps ensure orderly development and minimizes the potential for adverse off-site flooding or drainage impacts (FMFCD, n.d.).

3.3.6 San Joaquin Valley Air Pollution Control District

The San Joaquin Valley Air Pollution Control District (SJVAPCD) exercises air quality regulatory authority over demolition activities, construction emissions, and fugitive dust within the air basin. For building demolition, the District implements asbestos notification and work-practice requirements under District Rule 4002, which incorporates the federal National Emission Standards for Hazardous Air Pollutants (NESHAP) for asbestos (40 CFR Part 61, Subpart M). As a result, a 10-day written asbestos notification is required for all demolition projects, regardless of whether asbestos is present. In addition, the project would be subject to Rule 9510, Indirect Source Review (ISR), which requires new development to reduce construction-related and operational emissions of NOx and PM10 or pay off-site mitigation fees. The ISR rule is intended to offset air quality impacts from increased vehicle travel and construction activity associated with development projects. The District also enforces Regulation VIII (Fugitive PM10 Prohibitions), including Rule 8021, which requires preparation and District approval of a Dust Control Plan (DCP) for construction or demolition activities involving large, disturbed surface areas or substantial earthmoving. A DCP must identify fugitive dust sources and specify control measures, and construction cannot begin until the plan is approved. Through these regulatory programs, SJVAPCD ensures that demolition, construction, and site preparation activities minimize emissions and comply with regional air quality standards.

Chapter 4 Environmental Consequences and Mitigation Measures

4.A Overview

This section of the EIR addresses topics required by CEQA. Each topic (e.g., air quality, cultural resources) describes the existing setting or regulatory conditions to help the reader understand the conditions that could be affected by the project. Each topic includes a description of the impact evaluation criteria and analysis procedures. The impact statement is prefaced by a number for ease of identification. An explanation of each potential impact and an analysis of its significance follow the impact analysis. All mitigation measures are identified immediately following the impact analysis. The degree to which identified mitigation measures would reduce the impact is also described.

Although not specifically required by CEQA, less-than-significant impacts have also been discussed. No mitigation is mandated by CEQA for less-than-significant impacts.

As lead agency, the District must comply with the mitigation measures, including all reporting requirements, as a condition of approval of the project. Failure to fully comply with all required mitigation measures is potential cause for enforcement action. When monitoring of mitigation measures is required, the District shall maintain complete performance records on file for each such measure for trustee or responsible agency review.

Each impact topic is briefly described ("headed") and numbered in bold print. An impact discussion and analysis follow. At the end of the impact discussion, related mitigation measures are listed. The summary table for this DEIR, Table 1 in Chapter 1 *Executive Summary*, includes the same text heading and the mitigation measures.

4.A.a Determination of Significance

Under CEQA, a significant impact is defined as a substantial, or potentially substantial, adverse change in the environment (PRC Section 21068). The State CEQA Guidelines direct that this determination be based on substantial evidence in light of the whole record. The criteria for determining the significance of a particular impact are identified before the impact discussion in each topical section and are consistent with significance criteria set forth in the State CEQA Guidelines.

4.A.b Terminology Used in the Impact Analysis

This DEIR uses the following terminology to describe the environmental effects of the project:

- **Thresholds of Significance**. A set of criteria used by the lead agency to determine at what level of "threshold" an impact would be considered significant. Standards of significance used in this Begin double deletion. D End double deletion. EIR include those derived from questions set forth in the State CEQA Guidelines, which are criteria based on regulatory standards of local, State, and federal agencies. In determining the level of significance, the analysis assumed that the project would comply with relevant federal, State, and local regulations and ordinances.

- **Less-than-Significant Impact**. A project impact is considered less than significant when it does not reach the standard of significance, indicating that there would be no substantial change in the environment. No mitigation is required for a less-than-significant impact.

- **Potentially Significant Impact**. A potentially significant impact is an environmental effect that could cause a substantial adverse change in the environment; however, additional information is needed regarding the extent of the impact to make the determination of significance. For CEQA purposes, a potentially significant impact is treated as if it were a significant impact.

- **Significant Impact**. A project impact is considered significant if it results in a substantial adverse change in the physical conditions of the environment. Significant impacts are identified by the evaluation of project effects in the context of specified significance criteria. When available, potentially feasible mitigation measures and/or project alternatives are identified to reduce these effects on the environment.

4.A.c Level of Analysis for Environmental Topics

The environmental topics analyzed in Chapter 4, and later in Chapters 5 and 6, are organized in the following three categories: topics that requiring a detailed level of analysis, topics that requiring a moderate level of analysis, and topics requiring a brief level of analysis. All topics of Appendix G of the CEQA Guidelines were placed into one of these categories by considering each topic throughout the EIR preparation process. The rationale for each category is explained below at the start of each category.

4.A.c.i Topics Requiring a Detailed Level of Analysis

Air Quality, Historic Architectural Resources, and Hazards and Hazardous Materials were determined to require a detailed level of analysis to evaluate project impacts. For this Environmental Impact Report (EIR), the CEQA Guidelines topic of Cultural Resources was divided into two subtopics, with archaeological resources addressed separately under the moderate level of analysis category.

Air Quality. Air quality was determined to require a detailed level of analysis due to the proximity of project construction activities to sensitive receptors, including on-site students and nearby residents; the project's location within an AB 617 community-scale air quality planning area that experiences poor existing air quality conditions; and the technical complexity associated with evaluating project-level air quality impacts.

Historic Architectural Resources. Historic Architectural Resources were determined to require a detailed level of analysis because all permanent buildings at the project site are historic-era buildings (50 years of age or older), and four buildings have been identified as eligible for listing in the California Register of Historical Resources (with Classroom Buildings C and D considered a single resource).

Hazards and Hazardous Materials. Hazards and hazardous materials were determined to require a detailed level of analysis because the age of existing buildings creates the potential for hazardous material contamination; the project site would continue to serve sensitive receptors; and evaluation of current and historical site conditions, including testing for potential hazardous materials, requires detailed technical investigation and analysis

4.A.c.ii Topics Requiring a Moderate Level of Analysis

Aesthetics. The project would involve demolition and reconstruction of the existing Calwa Elementary School campus, resulting in changes to the site's visual character, building massing, architectural features, and overall visual cohesion. The removal of historically significant buildings further underscores the importance of evaluating potential aesthetic effects. Although aesthetic impacts would be primarily qualitative and localized to the project site and surrounding area, a moderate level of analysis is appropriate to assess visual character, compatibility with the surrounding neighborhood, and consistency with the established design context. Detailed visual simulations or quantitative modeling are not necessary because potential impacts can be adequately evaluated through descriptive comparison of existing and proposed conditions.

Biological Resources. The project site is fully developed and located within a highly urbanized setting, which limits the potential for sensitive biological resources to occur. However, a moderate level of analysis is warranted to address the potential presence of common urban wildlife, including nesting birds protected under the Migratory Bird Treaty Act, and to evaluate potential construction-related disturbance. The analysis focuses on regulatory compliance and implementation of standard avoidance and minimization measures, rather than detailed habitat assessments or focused biological surveys.

Archaeological Resources. No known archaeological resources have been identified on the project site; however, ground-disturbing activities associated with demolition and reconstruction could encounter previously unknown subsurface resources related to historic land uses in the Calwa area. A moderate level of analysis is therefore appropriate to address archaeological sensitivity, applicable regulatory requirements, and standard inadvertent discovery procedures. Given the previously disturbed condition of the site and the absence of recorded resources, detailed preconstruction archaeological investigations are not required for this analysis.

Energy and Energy Resources. The project would reconstruct the existing elementary school without increasing campus capacity or substantially intensifying operations. As such, long-term energy demand would be comparable to or lower than existing conditions. New facilities would comply with the 2025 California Building Code and current Title 24 energy efficiency standards, which incorporate more stringent energy conservation requirements than those in place when the existing buildings were constructed. Given the project's replacement-in-kind nature and lack of increased energy demand, a moderate, qualitative analysis is appropriate to evaluate construction and operational energy use and consistency with State energy conservation goals. Detailed quantitative modeling is not warranted.

Geology and Soils. The project would involve demolition, grading, and construction of new facilities, which introduce considerations related to seismic hazards, soil stability, and erosion. A moderate level of analysis is appropriate to evaluate general geologic and soil conditions, consistency with applicable building codes, and standard engineering design measures. Because the project does not include unusual structural features or development in a geologically sensitive area, additional project-specific geotechnical investigation beyond standard practice is not warranted.

Greenhouse Gas Emissions. The project would not increase student capacity or long-term operational activity. Construction would generate temporary greenhouse gas (GHG) emissions from equipment use, worker travel, and material transport. Operational emissions would be similar to or lower than existing conditions due to compliance with current building efficiency standards, including the 2025 California Building Code and Title 24 requirements. A moderate, qualitative analysis is appropriate to describe GHG sources, evaluate consistency with State reduction targets, and summarize applicable regulations. Detailed quantitative emissions modeling is not required for this project.

Hydrology and Water Quality. Construction activities could temporarily affect stormwater quality through ground disturbance, equipment use, and material handling. During operation, water use would be similar to existing conditions, and substantial changes to drainage patterns are not anticipated. A moderate level of analysis is appropriate to address construction stormwater compliance requirements, potential localized drainage or erosion issues, and consistency with applicable stormwater and water efficiency regulations. Detailed hydrologic or hydraulic modeling is not warranted.

Noise and Groundborne Vibration. Construction activities would generate temporary noise and vibration that could affect on-site students and staff, as well as nearby residents. These impacts would be short-term and subject to standard construction controls, including limitations on hours, equipment mufflers, and best management practices. Operational noise would remain similar to existing conditions. A moderate level of analysis is appropriate to describe construction noise sources, applicable standards, and typical mitigation measures. Detailed acoustic modeling is not necessary.

Transportation. The project would not increase student enrollment, staffing levels, or long-term vehicle trip generation. However, modifications to parking areas, drive aisles, and student drop-off/pick-up zones could alter on-site circulation patterns. A moderate level of qualitative analysis is appropriate to evaluate transportation safety, site access, and internal circulation, as well as consistency with local and State policies. Detailed traffic modeling or level of service analysis is not warranted.

Tribal Cultural Resources. No Tribal Cultural Resources (TCRs) have been identified on the project site; however, consultation pursuant to AB 52 and the potential for unknown subsurface resources warrant consideration. A moderate level of analysis is appropriate to document consultation efforts, evaluate regional tribal context, and outline standard inadvertent discovery procedures. In the absence of identified resources, specialized surveys are not required.

4.A.c.iii Topics Requiring a Brief Level of Analysis

Agriculture and Forestry Resources, Land Use and Planning, Mineral Resources, Population and Housing, Public Services, Recreation, Utilities and Service Systems, and Wildfire were determined to require a brief level of analysis to evaluate project impacts and are discussed in the sections that follow. The rationale for this categorization is described below.

Agriculture and Forestry Resources. The project site, an existing elementary school, may not have significant agricultural or forestry resources.

Land Use and Planning. No change in land use is proposed; the site would remain a public elementary school.

Mineral Resources. The project site, an existing elementary school, does not have significant mineral resources.

Population and Housing. The project would not impact existing housing and would modernize the existing school with no increase in capacity or student enrollment.

Public Services. The project site would continue its existing land use as a public elementary school with no increase in capacity or student enrollment.

Recreation. The project would modernize an existing elementary school, with no increase in capacity or student enrollment.

Utilities and Service Systems. The project would modernize an existing elementary school, with no increase in capacity or student enrollment, and would continue to be served by local utilities.

Wildfire. The project site is not near a wildfire-prone area.

Utilities and Service Systems. The project would modernize an existing elementary school, with no increase in capacity or student enrollment, and would continue to be served by local utilities.

Sub-Chapter 4A Topics Requiring Detailed Analysis

4.1 Air Quality

As described in Chapter 2, an NOP was published on March 20, 2026, to invite comments regarding environmental issues that should be examined in the EIR. One comment letter from the SJVAPCD noted that the EIR should evaluate the impact of the project on air quality.

4.1.1 Introduction

This section considers the potential project effects on air quality from construction-related and operational emissions of air pollutants, and identifies opportunities to avoid, reduce, or otherwise mitigate potential significant impacts. This analysis includes a description of the existing environmental setting; an overview of the air quality regulatory framework that guides the decision-making process; a summary of the assessment methodology used to model air pollutant emissions; thresholds and other criteria for determining impact significance; an analysis of impacts; and mitigation measures as necessary.

An Air Quality and Greenhouse Gas Impact Analysis for the project was prepared by Blair, Church & Flynn and is included as Appendix B of this Draft EIR. The data and conclusions from that report are incorporated here to support the evaluation of air quality impacts.

4.1.2 Environmental Setting

The project site is located within the San Joaquin Valley Air Basin (SJVAB), under the jurisdiction of the San Joaquin Valley Air Pollution Control District. Air quality in the basin is influenced by regional topography, meteorology, and climate, all of which affect pollutant formation and dispersion at both regional and local levels.

In addition to regional air quality management efforts, the project area is also subject to community-scale air quality planning under AB 617. Implemented by the California Air Resources Board in coordination with the SJVAPCD, establishes a framework to identify and prioritize communities with high cumulative exposure to air pollution. The program also supports the development and implementation of targeted strategies aimed at reducing localized emissions and minimizing community exposure to air pollutants.

The Calwa community, located in south Fresno within the central portion of the SJVAB, is part of the State-designated South-Central Fresno AB 617 community. This designation reflects the presence of a high cumulative pollution burden and the co-location of sensitive receptors with multiple emission sources. The AB 617 community boundary includes Calwa and Malaga and is traversed by State Route 99 and other heavily traveled roadways, with a concentration of freight, warehouse, and industrial land uses. These sources contribute to diesel exhaust, toxic air contaminants, and particulate matter emissions in proximity to residences, schools, and health care facilities.

Consistent with AB 617 requirements, the South-Central Fresno community is subject to a Community Emissions Reduction Program (CERP) and enhanced air monitoring. These efforts provide a more refined understanding of localized air quality conditions and inform strategies to reduce exposure in areas with disproportionate pollution

burdens. As a result, the environmental setting for this analysis considers not only basin-wide conditions but also localized air quality characteristics identified through the AB 617 process (SJVAPCD, 2019).

4.1.2.1 Topography, Meteorology, and Pollutant Dispersion

Air pollutant dispersion is governed by natural factors such as topography, meteorology, climate, atmospheric stability, and the presence of temperature inversions. In the SJVAB, these factors combine to limit air movement and contribute to pollutant accumulation.

The SJVAB occupies the southern portion of California's Central Valley. It is open to the north but bounded by mountain ranges on the remaining sides, which significantly constrain airflow. The Coast Ranges form the western boundary, with average elevations of approximately 3,000 feet, while the Sierra Nevada to the east rise from about 8,000 to 14,000 feet. The southern boundary is defined by the San Emigdio and Tehachapi Mountains, which reach elevations of approximately 6,000 to 8,000 feet. The valley floor is largely flat, with a gentle slope to the northwest (San Joaquin Valley Air Pollution Control District, 2015).

4.1.2.2 Meteorology and Climate

The SJVAB experiences an inland Mediterranean climate strongly influenced by surrounding topography. The encircling mountain ranges create a partial rain shadow effect, causing Pacific storm systems to release precipitation along coastal slopes and reduce rainfall within the valley. These same geographic features also restrict air circulation, contributing to stagnant atmospheric conditions, particularly during cooler months.

Summers are typically hot, dry, and clear, while winters are mild, more humid, and characterized by intermittent storm activity. Seasonal climate patterns are influenced by a semi-permanent subtropical high-pressure system. During summer, this system stabilizes atmospheric conditions and promotes consistent northwesterly winds, which can transport ozone and its precursors into the valley. In winter, the system weakens and shifts, allowing increased storm activity, enhanced atmospheric mixing, and generally improved air quality.

Seasonal variations in temperature, humidity, precipitation, and wind reflect the interaction between topography and atmospheric pressure systems. Summer temperatures frequently exceed 100°F, creating conditions conducive to ozone formation. Most precipitation occurs during winter storms, which temporarily improve air quality by increasing dispersion and atmospheric instability. However, between storm events, high-pressure systems and light winds often result in stagnant conditions that allow pollutants to accumulate.

4.1.2.3 Atmospheric Stability and Inversions

Atmospheric stability refers to the tendency of the atmosphere to resist or facilitate vertical air movement, directly influencing pollutant dispersion. Stability ranges from highly unstable conditions (Class A), which promote vertical mixing, to highly stable conditions (Class F), which inhibit it. Unstable conditions typically occur during the day due to solar heating, while stable conditions are more common at night or during periods of limited surface heating.

In the SJVAB, stable atmospheric conditions (Classes D through F) are most prevalent during late fall and winter, when cooler temperatures and limited mixing trap pollutants near the surface. Spring and summer are generally characterized by more unstable conditions that enhance dispersion, while transitional seasons exhibit a mix of stability types.

4.1.2.4 Temperature Inversion

Temperature inversions occur when a layer of warmer air overlies cooler air near the ground—further restrict vertical mixing and contribute to pollutant buildup. The SJVAB experiences both surface inversions, which typically form overnight and dissipate during the day, and elevated inversions, which occur less frequently but can persist longer and lead to more severe air stagnation. Surface inversions are most common in the fall, while stronger elevated inversions typically occur during winter months. Collectively, these meteorological and topographic conditions limit pollutant dispersion and contribute to the region's ongoing air quality challenges (San Joaquin Valley Air Pollution Control District, 2015).

4.1.2.5 Air Pollutants of Concern

Criteria Air Pollutants

The Federal Clean Air Act (FCAA) mandates that the U.S. Environmental Protection Agency (EPA) establish National Ambient Air Quality Standards (NAAQS) to safeguard public health and welfare. These pollutants are termed "criteria" pollutants because the EPA develops criteria documents to support the selection of these standards. The NAAQS specify the maximum permissible concentrations of these pollutants in the ambient air, with each standard defined as a concentration averaged over a specific time, such as one hour, eight hours, 24 hours, or one year. The varying averaging periods and concentration limits are designed to protect against different exposure effects. Primary standards aim to protect human health, while secondary standards focus on preventing environmental and property damage. The Clean Air Act permits states to adopt additional or more stringent standards to further protect public health and the environment (Environmental Protection Agency, 2024).

Ozone (O_3) is a reactive gas composed of three oxygen atoms. At ground level, it forms through photochemical reactions involving sunlight, nitrogen oxides (NO_x), and volatile organic compounds (VOCs). This ground-level ozone is a significant component of smog and poses various health risks, including respiratory issues and cardiovascular problems. In the stratosphere, however, ozone occurs naturally and serves to shield the Earth from harmful ultraviolet radiation.

Reactive Organic Gases (ROGs) are hydrocarbon compounds that participate in atmospheric chemical reactions, contributing to smog formation. While there are no specific health standards for ROGs as a group, some constituents, such as benzene, are toxic and may be evaluated in toxic risk assessments. Total Organic Gases (TOGs) encompass all ROGs, along with less reactive compounds like methane and acetone. VOCs are a subset of TOGs and are regulated due to their role in ozone formation.

Nitrogen Oxides (NO_x) are a group of highly reactive gases, including nitrogen dioxide (NO_2), nitrous acid, and nitric acid. NO_x is primarily produced from the combustion of fossil fuels at high temperatures and pressures, with major sources including on-road and off-road motor vehicles and fuel combustion. NO_x serves as a precursor to the formation of ozone and particulate matter, and at elevated concentrations, NO_2 can be toxic.

Particulate Matter (PM), or particle pollution, consists of tiny particles and liquid droplets composed of acids (e.g., nitrates and sulfates), organic compounds, metals, and dust. The size of these particles is critical to their health impact, with the EPA focusing on those 10 micrometers or smaller, as they can bypass the body's natural defenses and reach the lungs. Once inhaled, they can negatively affect both respiratory and cardiovascular health. The EPA classifies PM into three categories based on size and deposition location:

- Inhalable coarse particles ($PM_{2.5}$–PM_{10}): Found near roads and industrial sites, these particles range from 2.5 to 10 micrometers in diameter and settle in the thoracic region of the lungs.

- Fine particles ($PM_{2.5}$): Measuring 2.5 micrometers or smaller, these are common in smoke and haze, originating from sources such as wildfires or forming through chemical reactions in the atmosphere. They penetrate deep into the lungs, reaching the alveoli.
- Ultrafine particles (UFP): Smaller than 0.1 micrometers, these are produced by the combustion of fossil fuels, wood, and hydrocarbons. Though UFPs constitute a small fraction of $PM_{2.5}$ by mass, their high surface area and ability to enter the bloodstream can lead to greater health impacts.

Particulate matter pollution consists of both primary pollutants (direct emissions) and secondary pollutants (formed through atmospheric chemical reactions). $PM_{2.5}$ and UFPs originate from combustion sources like vehicles and power plants, while PM_{10} also includes emissions from roads, farming, and windblown dust.

Scientific studies link both short- and long-term exposure to PM with respiratory and cardiovascular issues. Prolonged exposure is associated with reduced lung function, chronic bronchitis, and premature death, while short-term exposure can trigger asthma, bronchitis, and respiratory infections. People with heart disease may face an increased risk of heart attack or arrhythmias. Healthy individuals typically experience minor irritation at elevated PM levels.

TABLE 6: STATE AND FEDERAL CRITERIA AIR POLLUTANT EFFECTS AND SOURCES

Pollutant	Principal Health and Atmospheric Effects	Typical Sources
Ozone (O_3)	High concentrations irritate lungs. Long-term exposure may cause lung tissue damage and cancer. Long-term exposure damages plant materials and reduces crop productivity. Precursor organic compounds include many known toxic air contaminants. Biogenic VOC may also contribute.	Low-altitude ozone is formed from reactive organic gases/volatile organic compounds (ROG or VOC) and nitrogen oxides (NOx) in the presence of sunlight and heat. Common precursor emitters include motor vehicles and other internal combustion engines, solvent evaporation, boilers, furnaces, and industrial processes.
Respirable Particulate Matter (PM_{10})	Irritates eyes and respiratory tract. Decreases lung capacity. Associated with increased cancer and mortality. Contributes to haze and reduced visibility. Includes some toxic air contaminants. Many toxic and other aerosol and solid compounds are part of PM_{10}.	Dust- and fume-producing industrial and agricultural operations; combustion smoke & vehicle exhaust; atmospheric chemical reactions; construction and other dust-producing activities; unpaved road dust and re-entrained paved road dust; natural sources.
Fine Particulate Matter ($PM_{2.5}$)	Increases respiratory disease, lung damage, cancer, and premature death. Reduces visibility and produces surface soiling. Most diesel exhaust particulate matter – a toxic air contaminant – is in the $PM_{2.5}$ size range. Many toxic and other aerosol and solid compounds are part of $PM_{2.5}$. It is also generated from dust from material movement.	Combustion including motor vehicles, other mobile sources, and industrial activities; residential and agricultural burning; also formed through atmospheric chemical and photochemical reactions involving other pollutants including NOx, sulfur oxides (SOx), ammonia, and ROG.
Carbon Monoxide (CO)	CO interferes with the transfer of oxygen to the blood and deprives sensitive tissues of oxygen. CO also is a minor precursor for photochemical ozone. Colorless, odorless.	Combustion sources, especially gasoline-powered engines and motor vehicles. CO is the traditional signature pollutant for on-road mobile sources at the local and neighborhood scale.
Nitrogen Dioxide (NO_2)	Irritating eyes and respiratory tract. Color's atmosphere reddish-brown. Contributes to acid rain & nitrate contamination of stormwater. Part of the "NOx" group of ozone precursors.	Motor vehicles and other mobile or portable engines, especially diesel; refineries; and industrial operations.

Sulfur Dioxide (SO_2)	Irritates respiratory tract; injures lung tissue. Can yellow plant leaves. Destructive to marble, iron, steel. Contributes to acid rain. Limit's visibility.	Fuel combustion (especially coal and high-sulfur oil), chemical plants, sulfur recovery plants, metal processing; some natural sources like active volcanoes. Limited contribution possible from heavy-duty diesel vehicles if ultra-low sulfur fuel not used.
Lead (Pb)	Disturbs gastrointestinal system. It causes anemia, kidney disease, and neuromuscular and neurological dysfunction. Also, a toxic air contaminant and water pollutant.	Lead-based industrial processes like battery production and smelters. Lead paint, lead gasoline. Aerially deposited lead from older gasoline use may exist in soils along major roads.
Visibility-Reducing Particles (VRP)	Reduces visibility. Produces haze. NOTE: not directly related to the Regional Haze program under the Federal Clean Air Act, which is oriented primarily toward visibility issues in National Parks and other "Class I" areas. However, some issues and measurement methods are similar.	See particulate matter above. May be related more to aerosols than to solid particles.
Sulfate	Premature mortality and respiratory effects. Contributes to acid rain. Some toxic air contaminants attach to sulfate aerosol particles.	Industrial processes, refineries and oil fields, mines, natural sources like volcanic areas, salt-covered dry lakes, and large sulfide rock areas.
Hydrogen Sulfide (H_2S)	Colorless, flammable, poisonous. Respiratory irritant. Neurological damage and premature death. Headache, nausea. Strong odor.	Industrial processes such as refineries and oil fields, asphalt plants, livestock operations, sewage treatment plants, and mines. Some natural sources like volcanic areas and hot springs.
Vinyl Chloride	Neurological effects, liver damage, cancer. Also considered a toxic air contaminant.	Industrial processes.
Source: (California Air Resources Board, n.d.)		

Carbon Monoxide (CO) is a colorless, odorless, and highly toxic gas, primarily produced by incomplete fuel combustion. The major source is motor vehicles. Although CO emissions have declined due to improved emission controls, it remains a concern in urban areas.

Sulfur Dioxide (SO_2) is a pungent gas primarily emitted from burning sulfur-rich fossil fuels. It contributes to poor visibility and can react with other pollutants to form fine particulate matter ($PM_{2.5}$). Regulations limiting sulfur in fuels have helped reduce its impact.

Lead (Pb) is a metal naturally present in the environment that persists indefinitely. Once a major air pollutant from leaded gasoline, its phase-out has significantly reduced airborne lead levels. Lead exposure can cause severe health effects, including neurological damage and reproductive issues.

Hydrogen Sulfide (H_2S) is associated with geothermal activity, oil refining, and sewage treatment. This gas has a strong "rotten egg" smell and is highly toxic at high concentrations. Occupational exposure is strictly regulated due to its potential lethality.

Odors are typically considered a nuisance rather than a direct health risk. However, individuals may experience a range of psychological and physiological responses to unpleasant odors. Psychological reactions can include irritation, anger, or anxiety, while physiological effects may involve nausea, headaches, respiratory discomfort, and circulatory issues.

Sensitivity to odors varies significantly among individuals, making odor perception highly subjective. Some people can detect extremely low concentrations of certain substances, while others may not be as sensitive but could have heightened reactions to different odors. Additionally, personal perception of odors differs—what one person

finds offensive, another might find pleasant or neutral (e.g., the smell of fast food). Unfamiliar odors tend to be more noticeable and more likely to generate complaints compared to familiar ones. This is due to a phenomenon known as odor fatigue, in which continuous exposure to an odor leads to desensitization, making it less perceptible over time unless its intensity changes.

Odors are characterized by two key properties: quality and intensity. Quality refers to the nature of the odor, such as whether it is floral or sweet. Intensity measures the odor's strength, which depends on the concentration of the odorant in the air. As an odorous substance is diluted, its concentration decreases, reducing its intensity until it reaches the detection threshold—below this point, the average person can no longer perceive it.

There are no federal or state regulations specifically governing odor control. The SJVAPCD does not have a dedicated rule addressing odors; however, they are covered under SJVAPCD Rule 4102 (Nuisance). Enforcement of odor-related concerns depends on complaints filed by citizens with local authorities or the SJVAPCD (San Joaquin Valley Air Pollution Control District, 1992).

Toxic Air Contaminants (TACs) are pollutants that can lead to increased mortality, serious illness, or pose a general hazard to human health. While typically present in very small amounts in the atmosphere, their high toxicity means they can be harmful even at low concentrations. Unlike criteria pollutants, for which acceptable exposure levels are established through state and federal ambient air quality standards, TACs do not have a known safe threshold below which health effects are not expected. As a result, TACs are not classified as "criteria pollutants" under the FCAA or the California Clean Air Act (CCAA) and are not subject to National or State Ambient Air Quality Standards (AAQS). Instead, these pollutants are regulated separately by the EPA and the CARB through various regulations requiring advanced emission control technologies. EPA enforces National Emission Standards for Hazardous Air Pollutants (NESHAPs), which set limits on emissions from specific sources based on technology standards, in accordance with the FCAA and its amendments (Environmental Protection Agency, 2024).
In California, TACs are primarily regulated under the Tanner Air Toxics Act (AB 1807) and the Air Toxics Hot Spots Information and Assessment Act of 1987 (AB 2588). The Tanner Act outlines a detailed process through which ARB identifies and designates substances as TACs, incorporating research, scientific peer review, and public input. Meanwhile, the Air Toxics Hot Spots Act requires facilities emitting TACs to:

1. Develop an inventory of toxic emissions,
2. Conduct a risk assessment if emissions are found to be significant,
3. Inform the public if risks reach a certain threshold, and
4. Implement strategies to reduce exposure where necessary.

Exposure to TACs can cause both immediate and long-term health effects. Short-term exposure may result in mild symptoms such as eye irritation or, in more severe cases, respiratory damage. However, some health effects, including cancer, may not become evident until months or years after the initial exposure.

At the local level, air pollution control districts oversee emissions from stationery and industrial sources. In the SJVAPCD, if a project has the potential to emit TACs or is in an area with existing toxic contamination near sensitive populations, a screening health risk assessment may be required to evaluate potential impacts under worse-case conditions.

The following section outlines the key TACs of concern relevant to the project in California and their associated health risks (California Air Resources Board, n.d.).

Diesel Particulate Matter (DPM) was classified by the CARB as a TAC in 1998. DPM is released from both mobile and stationary sources. In California, on-road diesel vehicles account for about 40% of the total DPM emissions, while other mobile sources like construction and mining equipment, agricultural machinery, and transport refrigeration units contribute an additional 57%. Stationary sources, which include shipyards, warehouses, heavy equipment repair yards, and oil and gas production operations, contribute around 3% of emissions. These emissions come from diesel-fueled internal combustion engines. Other stationary sources reporting DPM emissions include heavy construction, asphalt paving material manufacturers, and diesel-fueled power generation facilities.

In October 2000, the CARB released the "Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and Vehicles," also known as the Diesel Risk Reduction Plan (DRRP). The DRRP aims to reduce DPM concentrations by 85% by 2020 compared to the year 2000 baseline. Key strategies include retrofitting existing engines with emission control devices, implementing stringent standards for new diesel engines, and reducing the sulfur content in diesel fuel to protect advanced emission control technologies. The plan also promotes the use of alternative fuels and electrification. These measures are expected to significantly lower emissions from both old and new diesel vehicles and stationary sources.

Exposure to DPM can cause immediate health effects, such as irritation of the eyes, nose, throat, and lungs, coughs, headaches, lightheadedness, and nausea. Studies have shown that DPM exposure can lead to lung inflammation, aggravate chronic respiratory symptoms, and increase the frequency or severity of asthma attacks. The elderly and individuals with emphysema, asthma, and chronic heart and lung diseases are particularly vulnerable to fine-particle pollution. Children, whose lungs and respiratory systems are still developing, are also more susceptible to fine particles, which can increase the frequency of childhood illnesses and reduce lung function. In California, DPM is recognized as a carcinogen (California Air Resources Board, n.d.).

Asbestos refers to several types of naturally occurring fibrous minerals found in various parts of California, with chrysotile being the most common type. Serpentine rock, which often contains chrysotile asbestos, is abundant in the Sierra foothills, the Klamath Mountains, and the Coast Ranges. However, the project site is not in an area known for ultramafic rock (U.S Geologic Survey, 2011).
Asbestos is typically found in ultramafic rock, including serpentine, and near fault zones. The asbestos content in these rocks can range from less than 1% to about 25% or more. Asbestos is released when ultramafic and serpentine rock is broken or crushed, such as when cars drive over unpaved roads surfaced with these rocks, during land grading for construction, or at quarrying operations. Natural weathering and erosion also release asbestos, which can become airborne and remain in the air for extended periods.

Other sources of asbestos include building materials and man-made products, such as heat-resistant insulators, cement, furnace or pipe coverings, inert filler material, fireproof gloves and clothing, and brake linings. Although asbestos has been used in the U.S. since the early 1900s, it is no longer allowed in most home products and materials. Many older buildings, schools, and homes still contain asbestos products.

The CARB identified naturally occurring asbestos as a TAC in 1986. The CARB has implemented two statewide control measures to prohibit the use of serpentine or ultramafic rock for unpaved surfacing and to control dust emissions from construction, grading, and surface mining in areas with these rocks. Additional regulations address the control of asbestos-containing materials during building renovation and demolition.

All types of asbestos are hazardous and can cause lung disease and cancer. Health risks depend on the level and duration of exposure. The longer and more intense the exposure, the higher the risk of health problems. Asbestos-

related diseases, such as lung cancer, may not appear until decades after exposure. Smoking increases the risk of lung cancer from asbestos exposure (California Air Resources Board, n.d.).

Sensitive Receptors. One of the most important reasons for air quality standards is the protection of those members of the population who are most sensitive to the adverse health effects of air pollution, termed "sensitive receptors." The term sensitive receptors refer to specific population groups and land uses where individuals would reside for long periods. Commonly identified sensitive population groups are children, the elderly, the acutely ill, and the chronically ill. Commonly identified sensitive land uses would include facilities that house or attract children, the elderly, people with illnesses, or others who are especially sensitive to the effects of air pollutants. Residential dwellings, schools, parks, playgrounds, childcare centers, convalescent homes, and hospitals are examples of sensitive land uses.

Sensitive land use near the proposed project site is the Calwa Elementary School campus itself, residential land uses adjacent to the east and 80 ft. to the west, medical offices 150 ft. to the south, and a church 100 ft. to the north.

4.1.3 Regulatory Setting

4.1.3.1 Federal Laws, Regulations, and Policies

The primary legislation that governs federal air quality regulations is the Clean Air Act Amendments of 1990. The act delegates primary responsibility for clean air to EPA. EPA develops rules and regulations to preserve and improve air quality and delegates specific responsibilities to State and local agencies. Under the act, EPA has established the NAAQS for seven potential air pollutants: CO, O3, NO2, PM10 and PM2.5, SO2, and lead. The purpose of the NAAQS is two-tiered: primarily to protect public health, and secondarily to prevent degradation to the environment (i.e., impairment of visibility, damage to vegetation and property).

The Toxic Substances Control Act (TSCA) initially empowered the EPA to regulate asbestos in schools and public and commercial buildings under Title II, known as the Asbestos Hazard Emergency Response Act (AHERA). AHERA mandates that Local Education Agencies (LEAs) inspect their schools for asbestos-containing building materials (ACBM) and develop management plans to mitigate asbestos hazards. Additionally, the Act created a program for training and accrediting individuals who perform specific types of asbestos-related work (Environmental Protection Agency, 2024).

4.1.3.2 State Laws, Regulations, and Policies

The CARB is responsible for overseeing and coordinating state and local air pollution control programs in California. It is also tasked with implementing the CCAA of 1988. CARB's responsibilities include monitoring air quality in collaboration with air pollution control districts and air quality management districts, setting California Ambient Air Quality Standards (CAAQS), which are often more stringent than federal NAAQS, and establishing emissions standards for new motor vehicles. The CAAQS are summarized in Table 7. These vehicle emissions standards vary based on factors such as model year, vehicle type, fuel type, and engine specifications.

TABLE 7: SUMMARY OF AMBIENT AIR QUALITY STANDARDS

Pollutant	Average Time	California Standards	National Standards (Primary)
Ozone (O_3)	1-hour	0.09 ppm (180 µg/m³)	–
Ozone (O_3)	8-hour	0.070 ppm (137 µg/m³)	0.070 ppm
Particulate Matter (PM_{10})	AAM	20 µg/m³	–
Particulate Matter (PM_{10})	24-hour	50 µg/m³	150 µg/m³
Fine Particulate Matter ($PM_{2.5}$)	AAM	12 µg/m³	9.0 µg/m³
Fine Particulate Matter ($PM_{2.5}$)	24-hour	No Standard	35 µg/m³
Carbon Monoxide (CO)	1-hour	20 ppm (23 mg/m³)	35 ppm (40 mg/m³)
Carbon Monoxide (CO)	8-hour	9.0 ppm (10 mg/m³)	9 ppm (10 mg/m³)
Carbon Monoxide (CO)	8-hour (Lake Tahoe)	6 ppm (7 mg/m³)	–
Nitrogen Dioxide (NO_2)	AAM	0.030 ppm (57 µg/m³)	53 ppb (100 µg/m³)
Nitrogen Dioxide (NO_2)	1-hour	0.18 ppm (339 µg/m³)	100 ppb (188 µg/m³)
Sulfur Dioxide (SO_2)	AAM	–	0.03 ppm (for certain areas)
Sulfur Dioxide (SO_2)	24-hour	0.04 ppm (105 µg/m³)	0.14 ppm (for certain areas)
Sulfur Dioxide (SO_2)	3-hour	–	–
Sulfur Dioxide (SO_2)	1-hour	0.25 ppm (655 µg/m³)	75 ppb (196 µg/m³)
Lead	30-day Average	1.5 µg/m³	–
Lead	Calendar Quarter	–	1.5 µg/m³ (for certain areas)
Lead	Rolling 3-Month Average	–	0.15 µg/m³
Sulfates	24-hour	25 µg/m³	No Federal Standards
Hydrogen Sulfide	1-hour	0.03 ppm (42 µg/m³)	No Federal Standards
Vinyl Chloride	24-hour	0.01 ppm (26 µg/m³)	No Federal Standards
Visibility-Reducing Particle Matter	8-hour	Extinction coefficient: 0.23/kilometer-visibility of 10 miles or more (0.07-30 miles or more for Lake Tahoe)	No Federal Standards

µg/m³ = micrograms per square metersAAM = Annual Arithmetic Mean
ppb = parts per billion ppm= parts per million
For more information visit: https://ww2.arb.ca.gov/sites/default/files/2024-08/AAQS%20Table_ADA_FINAL_07222024.pdf
Source: (California Air Resources Board, 2024)

4.1.3.2.a. California Clean Air Act

In 1988, the CCAA was passed by the California Legislature to address air quality problems beyond the scope of the FCAA. Given that California has some of the most severe air quality issues in the United States, additional measures were necessary beyond the federal mandates. The CARB manages CAAQS for the 10 air pollutants identified in the CCAA, including the six federal standards and four additional pollutants:

- visibility-reducing particulates,
- hydrogen sulfide,

- sulfates, and
- vinyl chloride

The EPA authorized California to enforce its own regulations for motor vehicles and other sources that are more stringent than the federal regulations implementing the FCAA. While the planning requirements of the CCAA are less strict than the FCAA, consistency with the federal act would also ensure consistency with the CCAA (South Coast Air Quality Management District, 2024).

California Assembly Bill 170: In 2003, California enacted AB 170, which added Section 65302.1 to the Government Code. This legislation mandates that cities and counties within the San Joaquin Valley amend their general plans to incorporate data analysis, comprehensive goals, policies, and feasible implementation strategies aimed at improving air quality. The law acknowledges the severe air pollution challenges in the San Joaquin Valley and emphasizes the need for collaboration among land use and transportation planning agencies, transit operators, the development community, the SJVAPCD, and the public to address these issues. The required general plan amendments must include a report detailing local air quality conditions, emission inventories, significant source categories, attainment statuses, and applicable state and federal air quality and transportation plans. This initiative underscores California's commitment to enhancing air quality through integrated planning and community involvement (California State Legislature 2003-2004 Session, 2003).

Assembly Bills 1807 & 2588 - Toxic Air Contaminants: In California, TACs are primarily regulated under two legislative acts: AB 1807, known as the Tanner Air Toxics Act, and AB 2588, the Air Toxics "Hot Spots" Information and Assessment Act of 1987.

AB 1807 (Tanner Air Toxics Act): This act establishes a formal process for the CARB to identify and control TACs. The procedure involves comprehensive research, opportunities for public participation, and scientific peer review before a substance is officially designated as a TAC (California Air Resources Board, 2008).

AB 2588 (Air Toxics "Hot Spots" Act): This legislation requires stationary sources of emissions to report the types and quantities of certain substances they release into the air. Facilities identified under this act must:

- Prepare a toxic emissions inventory to document the pollutants emitted.
- Conduct a risk assessment if emissions are significant, evaluating potential health impacts on the surrounding community.
- Notify the public if significant health risks are identified, ensuring transparency and community awareness.
- Develop and implement risk reduction measures to mitigate identified health risks to acceptable levels (California Air Resources Board, n.d.).

These acts collectively aim to monitor, assess, and reduce public exposure to harmful air pollutants in California.

4.1.3.3 Local Laws, Regulations, and Policies

4.1.3.3.a. San Joaquin Valley Air Pollution Control District

The SJVAPCD is responsible for ensuring that air quality standards are met and maintained within the SJVAB, where the proposed project is located. Its duties include preparing plans to achieve ambient air quality standards, adopting and enforcing regulations for air pollution sources, issuing permits for stationary sources, inspecting these sources and addressing citizen complaints, monitoring air quality and meteorological conditions, and

implementing programs required by the FCAA and the CCAA (San Joaquin Valley Air Pollution Control District, n.d.). The SJVAPCD Rules and Regulations that are applicable to the proposed project include, but are not limited to, the following:

- **Regulation VIII (Fugitive Dust Prohibitions).** Regulation VIII (Rules 8011-8081). This regulation is a series of rules designed to reduce particulate emissions generated by human activity, including construction and demolition activities, carryout and trackout, paved and unpaved roads, bulk material handling and storage, unpaved vehicle/traffic areas, open space areas, etc. (San Joaquin Valley Air Pollution Control District, 2004).
- **Rule 4002 (National Emissions Standards for Hazardous Air Pollutants).** This rule may apply to projects in which portions of an existing building would be renovated, partially demolished or removed. Regarding asbestos, the NESHAP specifies work practices to be followed during renovation, demolition or other abatement activities when friable asbestos is involved. Prior to demolition activity, an asbestos survey of the existing structure may be required to identify the presence of any asbestos containing building materials (ACBM). Removal of identified ACBM must be removed by a certified asbestos contractor in accordance with CAL-OSHA requirements (San Joaquin Valley Air Pollution Control District, 2007).
- **Rule 4102 (Nuisance).** Applies to any source operation that emits or may emit air contaminants or other materials (San Joaquin Valley Air Pollution Control District, 1992).
- **Rule 4103 (Open Burning).** This rule regulates the use of open burning and specifies the types of materials that may be open burned. Section 5.1 of this rule prohibits the burning of trees and other vegetative (non-agricultural) material whenever the land is being developed for non-agricultural purposes (San Joaquin Valley Air Pollution Control District, 2010).
- **Rule 4601 (Architectural Coatings).** Limits volatile organic compounds from architectural coatings (San Joaquin Valley Air Pollution Control District, 2020).
- **Rule 4641 (Cutback, Slow Cure, and Emulsified Asphalt, Paving and Maintenance Operations).** This rule applies to the manufacture and use of cutback, slow cure, and emulsified asphalt during paving and maintenance operations (San Joaquin Valley Air Pollution Control District, 1992).
- **Rule 9510 (Indirect Source Review - ISR).** Requires developers of larger residential, commercial, recreational, and industrial projects to reduce smog-forming and particulate emissions from their projects' baselines. If project emissions still exceed the minimum baseline reductions, a project's developer will be required to mitigate the difference by paying an off-site fee to the District, which would then be used to fund clean-air projects. For projects subject to this rule, the ISR rule requires developers to mitigate and/or offset emissions sufficient to achieve: (1) 20-percent reduction of construction equipment exhaust NOx; (2) 45-percent reduction of construction equipment exhaust PM_{10}; (3) 33-percent reduction of operational NOx over 10 years; and (4) 50-percent reduction of operational PM_{10} over 10 years. SJVAPCD ISR applications must be filed "no later than applying for a final discretionary approval with a public agency" (San Joaquin Valley Air Pollution Control District, 2017).

SJVAPCD Regulatory Attainment Designations

Under the CCAA, the CARB is responsible for designating areas in the state based on air quality status in relation to specific standards. Areas are designated as "attainment" if pollutant concentrations meet the standards, and as "nonattainment" if pollutant concentrations exceed the standards at least once, excluding those violations caused by exceptional events. Nonattainment areas are further categorized as serious, severe, or extreme, depending on the frequency and severity of violations. An "unclassified" designation is used when data does not support either attainment or nonattainment status. The CCAA establishes increasingly stringent control measures for areas based

on these classifications. Similarly, the EPA classifies areas for pollutants like ozone, CO, NO_2, and SO_2, but the terminology used by CARB (attainment, nonattainment, unclassified) is more commonly referenced. The EPA also uses subcategories for nonattainment status, including serious, severe, and extreme.

The state and national attainment status designations pertaining to the SJVAB are summarized in Table 8. The SJVAB is currently designated as a nonattainment (extreme) with respect to the state 1-hour ozone, 8-hour ozone, $PM_{2.5}$, and PM_{10} standards. The SJVAB is designated nonattainment for the national, 8-hour ozone and $PM_{2.5}$ standards (San Joaquin Valley Air Pollution Control District, n.d.).

TABLE 8: SJVAB ATTAINMENT STATUS DESIGNATION

Pollutant	Federal Designation	State Designation
Ozone, 1 hour	No Standard	Nonattainment/Severe
Ozone, 8 hour	Nonattainment/Extreme	Nonattainment
PM_{10}	Attainment	Nonattainment
$PM_{2.5}$	Nonattainment	Nonattainment
Carbon Monoxide	Attainment/Unclassified	Attainment/Unclassified
Nitrogen dioxide	Attainment/Unclassified	Attainment
Sulfur dioxide	Attainment/Unclassified	Attainment
Lead (particulate)	No Designation/Classification	Attainment
Hydrogen sulfide	No Federal Standard	Unclassified
Sulfates	No Federal Standard	Attainment
Visibility-reducing particulates	No Federal Standard	Unclassified
Vinyl Chloride	No Federal Standard	Attainment
For more information visit website url: https://ww2.valleyair.org/air-quality-information/ambient-air-quality-standards-valley-attainmnet-status/ *Source:* (San Joaquin Valley Air Pollution Control District, n.d.)		

AB 617 – Community Air Protection Program

Assembly Bill (AB) 617 established a statewide framework to reduce air pollution in California's most overburdened and disadvantaged communities. The legislation directed the California Air Resources Board (CARB) to implement the Community Air Protection Program (CAPP), which prioritizes areas with high cumulative exposure to air pollutants and environmental justice concerns. Under AB 617, CARB and local air districts develop Community Air Monitoring Plans (CAMPs) and Community Emissions Reduction Programs (CERPs) tailored to selected communities.

Key components of AB 617 include:

- Community-level monitoring networks to characterize localized pollutant exposures.
- Statewide and community-specific emission reduction strategies addressing both stationary and mobile sources.
- Accelerated review of industrial pollution control technologies.
- Enhanced emission reporting requirements for regulated facilities.
- Increased penalties for violations.

AB 617 emphasizes community participation through Community Steering Committees (CSCs), which help guide monitoring priorities, emissions reduction strategies, and funding decisions. These committees include community

members, nonprofit organizations, agencies, and industry representatives, ensuring that adopted measures reflect local conditions and lived experience.

Relevance to CEQA

AB 617 is relevant to CEQA air quality analysis because it provides a refined regulatory and environmental context for evaluating emissions, exposure, and mitigation. Key considerations include:

1. Enhanced Monitoring Data – Localized monitoring identifies pollution hotspots and sensitive receptors that may require project-specific analysis.
2. Community-Identified Priorities – CERPs establish targeted strategies and priority issues that should be considered when evaluating project consistency with air quality goals.
3. Emission Reduction Expectations – AB 617 may introduce more stringent or community-specific expectations for emissions from stationary and mobile sources.
4. Environmental Justice – AB 617 provides detailed demographic, health, and exposure data that support CEQA's evaluation of impacts on disadvantaged communities.

4.1.3.3.b. South Central Fresno – AB 617 Community Context, Designation, and Community Characteristics

South Central Fresno was selected by CARB in 2018 as an AB 617 community due to its high cumulative pollution burden and concentration of disadvantaged census tracts. The area includes Calwa and Malaga and is influenced by major pollution sources such as freight operations, industrial facilities, and Highways 99, 41, and 180.
The community contains numerous sensitive receptors, including 36 schools, 31 daycare centers, and 5 hospitals, and experiences elevated rates of asthma, cardiovascular disease, and socioeconomic hardship. Historical land use patterns, including redlining and industrial siting, have contributed to these disproportionate exposure burdens. More recent trends—such as the presence of older manufacturing facilities and growth in warehouse development—continue to intensify emissions of diesel particulate matter ($PM_{2.5}$), nitrogen oxides (NOx), and air toxics.

Community Emissions Reduction Program (CERP)

CARB-approved CERPs for South Central Fresno identify a range of emission reduction strategies aligned with community priorities, including:

- Vegetative buffers and urban greening
- Truck rerouting and mobility improvements
- Health impact studies
- Indoor air filtration programs

These measures were developed through extensive public engagement led by the Community Steering Committee. Implementation is ongoing, with the Valley Air District using localized monitoring and community input to track progress and refine strategies.

AB 617 monitoring and planning efforts provide a detailed understanding of local pollutant concentrations, emission sources, and exposure patterns. These analyses identify parts of the Calwa area as among the most burdened in California for cumulative pollution exposure.

Although regional air quality in the San Joaquin Valley Air Basin has improved over time, these gains do not eliminate localized exceedances or exposure disparities. Conditions in South Central Fresno remain strongly influenced by nearby sources and meteorological factors such as stagnant winter conditions, which can elevate particulate matter concentrations.

Accordingly, AB 617 strategies focus on reducing near-source exposure through measures such as truck routing improvements, vegetative barriers, and enhanced building filtration. These localized actions complement regional controls and are an important consideration in project-level CEQA analysis, particularly with respect to sensitive receptors and localized health risks.

Environmental Justice and Socioeconomic Factors

The Calwa neighborhood exhibits socioeconomic characteristics associated with heightened vulnerability to air pollution. American Community Survey data indicate lower per capita income and higher poverty rates compared to county and state averages, along with a predominantly Latino population and a relatively high proportion of linguistically isolated households. These factors align with CalEnviroScreen's designation of south and southwest Fresno as disadvantaged communities. Public health assessments and agency studies have identified elevated rates of asthma and cardiovascular disease in South Central Fresno, linking these outcomes to historical land use patterns that placed heavy industry and major freight corridors near residential areas. In response, state and local environmental justice initiatives have focused on reducing diesel exposure, improving indoor air quality in homes and schools, and addressing cumulative impacts through targeted planning and enforcement (Census Reporter, 2023) (California Air Resources Board, n.d.).

Recent transportation proposals highlight the ongoing tension between regional mobility needs and localized exposure risks in Calwa and surrounding communities. Community organizations have expressed concerns that freeway interchange improvements and expanded truck access along the State Route 99 corridor could increase heavy-duty vehicle activity in already burdened neighborhoods, potentially triggering project-level conformity requirements and particulate matter "hot spot" analyses under federal transportation conformity regulations (Friends of Calwa, Inc., 2024).

Within this context, environmental justice considerations are integral to evaluating project impacts and identifying appropriate mitigation. The AB 617 community profile for South Central Fresno documents a high concentration of sensitive receptors, including schools, daycare facilities, and healthcare centers—and identifies freight operations, industrial sources, and freeway traffic as primary contributors to localized air quality risks. Recent studies by the City of Fresno and the California Air Resources Board outline strategies such as truck rerouting, targeted enforcement, and the use of buffers to reduce exposure along priority corridors. These efforts emphasize coordinated, multi-agency implementation and reflect recognition that, despite regional air quality improvements, communities like Calwa may continue to experience disproportionate exposure due to proximity to emission sources and underlying socioeconomic vulnerability (California Air Resources Board, n.d.) (City of Fresno, 2024).

Overall, the Calwa area represents a setting where regional nonattainment for pollutants such as NO_X and $PM_{2.5}$ intersects with concentrated local emission sources and sensitive land uses. The environmental baseline therefore includes both persistent regional air quality challenges and localized exposure pathways associated with goods movement and industrial activity. Given the presence of disadvantaged communities and documented health disparities, evaluation of the proposed project should incorporate environmental justice considerations to ensure that incremental emissions (such as diesel particulate matter, construction-related dust, and other air pollutants)

do not exacerbate existing conditions or conflict with the community emissions reduction goals established for South Central Fresno.

Community Air Monitoring Plan (CAMP)

The CAMP for South Central Fresno (2019) outlines the monitoring site locations, pollutant types, and sampling strategies deployed to identify localized hotspots, all critical data for CEQA baseline analysis. This plan supports evaluation of project impacts by providing high-resolution air quality data unique to this community (SJVAPCD, 2019).

Calwa Community – Relevant Policies and Considerations

The community of Calwa is explicitly included within the AB 617 South-Central Fresno boundary. It is part of the broader disadvantaged area experiencing elevated exposures from mobile and industrial sources. CEQA analyses involving Calwa must incorporate:

1. AB 617 Regulatory Context
Projects will need to demonstrate consistency with the South-Central Fresno CERP and CAMP, including avoiding conflict with community-identified emission reduction goals.

2. Cumulative Air Quality Burden
Calwa is located near major freeways and industrial corridors, contributing to high $PM_{2.5}$ and ozone burdens documented in regional AB 617 analyses. These cumulative impacts should be incorporated into CEQA thresholds and cumulative impact evaluations (California Air Resources Board, n.d.).

3. Transportation and Conformity Considerations
Calwa stakeholders have actively engaged in regulatory processes involving major transportation infrastructure, including recent comments addressing conformity under the Clean Air Act for projects such as the State Route 99 Corridor. These comments highlight concerns about diesel emissions, hot-spot analysis requirements, and increased particulate matter concentrations in overburdened South Fresno neighborhoods. CEQA analyses for nearby projects should evaluate consistency with federal and state transportation conformity rules (Friends of Calwa, Inc., 2024).

South-Central Fresno Ambient Air Quality Data

Air pollutant concentrations are measured at several monitoring stations in Fresno County. The Fresno-Drummond Street Monitoring Station is the closet representative monitoring site to the proposed project site, located approximately 0.7 miles southeast of the project site at Fresno County Fire Station No. 87, at 4706 E Drummond Avenue, Fresno, CA 97372, though not all pollutants are measured at this location. Two other monitoring stations within the City of Fresno are referenced in this analysis, the 2482 Foundry Park Avenue Monitoring Station, located approximately 1.35 miles northwest of the site, and the Fresno-Garland Monitoring Station, located approximately 5.45 miles northwest of the site at 3727 N First Street, Fresno CA 93726. These monitoring stations monitor ambient concentrations of ozone, nitrogen dioxide, sulfur dioxide, PM_{10}, and $PM_{2.5}$. Ambient monitoring data was obtained for the last three years of available measurement data (i.e., 2023 through 2025) and are summarized in Table 4 in Appendix B. As depicted, the state and national standards for ozone, PM_{10}, and $PM_{2.5}$ were exceeded on numerous occasions over the past 3 years.

4.1.4 Impact Analyses

4.1.4.1 Methodology

Short-term (construction) and long-term (operational) emissions that would result from the project were estimated using the CalEEMod version 2022.1.1.45 web-based platform. Emission results were then compared to the thresholds of significance discussion in Section 4.1.4.2 *Thresholds of Significance.*

4.1.4.1.a. Short-term Emissions

Emissions were modeled for each of the three primary construction phases of the proposed project. Within each overall phase, CalEEMod was used to quantify emissions associated with all applicable construction sub-phases, including demolition, site preparation, grading, building construction, paving, and architectural coating application.

The model relies on a combination of default emission factors and activity assumptions derived from the California Air Resources Board (CARB), OFFROAD2017, EMFAC, and district-endorsed methodologies. For this analysis, default CalEEMod construction parameters were retained (e.g., equipment fleet, horsepower, load factors, worker and vendor trip rates), except where phase durations and sub-phase schedules were replaced with project-specific information provided by the District's construction manager.

Phase 1 of construction is expected to commence in June 2028 and take approximately 15 months to complete, lasting the entire duration of the project, finishing in August 2029. Phase 1 includes two sub-phases, Phase 1a, which would be a short phase between June 2028 and August 2028 to complete critical work during summer recess, while Phase 1b would occur during the entire project duration, starting at the same time in June 2028 and end at the end of the entire project in August 2029.

Phase 2 of construction is expected to overlap with the end of Phase 1, as it is estimated to commence in June 2029 and take approximately three months to complete in August 2029. Phase 2 can be thought of in two non-overlapping sub-phases where Phase 2a would demolish and clear the site between June 2029 and July 2029 and Phase 2b would construct the site between July 2029 and August 2029.

Incorporating these refined construction schedules ensures a more accurate representation of the anticipated construction timeline while preserving consistency with CalEEMod's standard equipment and operational assumptions. To appropriately account for the overlapping construction sub-phases, (Phase 1a and 1b in 2028, and Phase 1b and Phase 2 in 2029),the emissions analysis was conducted as follows:

1) Maximum annual emissions were calculated by combining maximum emissions of Phase 1 and Phase 2 for 2029 in Table 10, and
2) maximum daily emissions were calculated by combining the maximum construction emissions from the two highest activities in 2028 from sub-phases 1a and 1b in Table 11.

Although the actual construction schedule may vary during implementation, the modeling approach provides representative and reasonably conservative emission estimates. Any minor variations in construction timing, sequence, or equipment usage would not be expected to result in emissions that differ materially from those presented in this analysis because CalEEMod's default values and the project-specific schedule inputs capture the typical range of construction activity intensities.

All modeling assumptions, input adjustments, and detailed CalEEMod output files are provided in Appendix A of this report.

4.1.4.1.b. Long-term Emissions

Operational emissions were evaluated for the anticipated year of operation in 2029 as shown in Table 12 and Table 13.

Because the project consists of replacement facilities on an existing elementary school campus, no increase in student capacity, staffing, enrollment, or daily use would occur compared to existing conditions. As a result, the project would not generate additional vehicle trips beyond existing baseline activity levels. To reflect this condition, all mobile-source trip rates and associated vehicle-related operational emissions in CalEEMod were set to zero. This approach is consistent with CEQA practice for replacement-in-kind public-facility projects that do not introduce new operational activity. Based on these assumptions, the project would not result in any net increase in mobile-source operational emissions.

Non-mobile operational emissions were estimated using CalEEMod default factors for area sources, energy consumption, water and wastewater conveyance, and solid waste generation/disposal, applied to the proposed land uses. These defaults include statewide or region-appropriate emission factors for electricity generation, natural gas use, waste disposal, and water system energy intensity, and provide a conservative representation of long-term operational activity at the reconfigured school campus.

In addition to emissions modeling, a qualitative assessment was conducted to evaluate localized pollutant exposure from operational activities, including fugitive dust, mobile-source carbon monoxide (CO), and odors.

All model inputs, assumptions, and CalEEMod output files are included in the appendix of the Air Quality and Greenhouse Gas Impact Analysis in Appendix B of this DEIR.

4.1.4.2 Thresholds of Significance

In accordance with Appendix G of the CEQA Guidelines Initial Study Checklist, a project would be considered to have a significant impact to air quality if it would:

a. Conflict with or obstruct implementation of the applicable air quality plan.
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard.
c. Expose sensitive receptors to substantial pollutant concentrations.
d. Result in other emissions (such as those leading to odors) adversely affecting many people.

To assist local authorities in the evaluation of air quality impacts, the SJVAPCD has published the Guide for Assessing and Mitigating Air Quality Impacts (GAMAQI) (San Joaquin Valley Air Pollution Control District, 2015). This guidance document includes recommended thresholds of significance to be used for the evaluation of short-term construction, long- term operational, odor, toxic air contaminant, and cumulative air quality impacts. Accordingly, the SJVAPCD-recommended thresholds of significance are used to determine whether implementation of the proposed project would result in a significant air quality impact. The thresholds of significance are summarized below.

- Short-term Emissions—Construction impacts associated with the proposed project would be considered significant if project-generated emissions would exceed 100 tons per year (TPY) of CO, 10 TPY of ROG or NOx, 27 TPY of SOx, or 15 TPY of PM_{10} or $PM_{2.5}$.
- Long-term Emissions—Operational impacts associated with the proposed project would be considered significant if project generated emissions would exceed 100 TPY of CO, 10 TPY of ROG or NOx, 27 TPY of SOx, or 15 TPY of PM_{10} or $PM_{2.5}$.
- Conflict with or Obstruct Implementation of Applicable Air Quality Plan—Due to the region's non-attainment status for ozone, $PM_{2.5}$, and PM_{10}, if project-generated emissions of ozone precursor pollutants (i.e., ROG and NOx) or PM would exceed the SJVAPCD's significance thresholds, then the project would be considered to conflict with the attainment plans.
- Local Mobile-Source CO Concentrations—Local mobile source impacts associated with the proposed project would be considered significant if the project contributes to CO concentrations at receptor locations in excess of the CAAQS (i.e., 9.0 ppm for 8 hours or 20 ppm for 1 hour).
- Exposure to TACs would be considered significant if the probability of contracting cancer for the Maximally Exposed Individual (i.e., maximum individual risk) would exceed 20 in 1 million for carcinogens or would result in a Hazard Index greater than 1 for non-carcinogens.
- Odor impacts associated with the proposed project would be considered significant if it could frequently expose members of the public to objectionable odors.

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

The project site is located within the AB 617-designated South-Central Fresno community, an area identified by the CARB as a disadvantaged community with elevated cumulative air pollution burdens and sensitive receptor populations. In response to these conditions, CARB and the SJVAPCD, in partnership with local residents, developed the South-Central Fresno Community Emissions Reduction Program (CERP) to implement targeted emission-reduction strategies, exposure-reduction measures, and community-prioritized actions aimed at improving local air quality and public health. Because the CERP establishes localized clean-air objectives, including measures to reduce diesel particulate matter, mobile-source emissions, industrial emissions, and cumulative exposure within sensitive communities, its policies serve as an additional framework for evaluating project-level air quality impacts (SJVAPCD, 2023). Accordingly, consistency with the South-Central Fresno CERP represents a project-specific threshold of significance, requiring an assessment of whether the proposed project would impede, conflict with, or support implementation of the community's air-quality improvement strategies.

4.1.4.3 Impacts and Mitigation Measures

4.1.4.3.a. Impact AQ-A:

During construction, would the proposed project conflict with or obstruct implementation of the applicable air quality plan?

Less Than Significant with Mitigation Incorporated

In accordance with SJVAPCD-recommended methodology for the assessment of air quality impacts, projects that result in significant air quality impacts at the project level are also considered to have a significant cumulative air quality impact. As noted later in Impact AQ-B, short-term construction and long-term operational emissions would not exceed thresholds of the SJVAPCD GAMAQI. In addition, the proposed project would not result in an increase in vehicle miles traveled (VMT) and would be consistent with the Fresno Council of Government's (FCOG's) 2022 Regional Transportation Plan and Sustainable Communities Strategies (Fresno Council of Governments, 2022).

The project site is located within the South-Central Fresno AB 617 Community, where the SJVAPCD, in coordination with CARB and community stakeholders, has developed the Community Emissions Reduction Program (CERP) to reduce localized air pollution and cumulative exposure burdens. Table 9 provides a project-specific review of the proposed improvements for general consistency with relevant CERP goals, strategies, and community-selected measures. This qualitative assessment evaluates whether the project would support, be consistent with, or conflict with the air quality and exposure-reduction objectives of the South-Central Fresno CERP.

Table 9: AB 617 South Central Fresno CERP Consistency Analysis

Criterion/Measure	Consistency Analysis
1. BACT / T-BACT / AAQA (Rule 2201 permit requirements)	**Consistent.** If the project installs any new permitted stationary equipment (e.g., boilers, emergency generators), it will comply with SJVAPCD BACT/T-BACT and AAQA requirements. If no such equipment is added, the project remains consistent because it would not introduce new stationary sources and does not conflict with emission-reduction goals.
2. Rule 9510 – Indirect Source Review (ISR)	**Consistent.** The project would require an ISR Air Impact Application be submitted to and approved by the SJVAPCD prior to the start of construction.
3. CERP Strategies – Heavy-Duty Mobile Source Reductions	**Consistent.** The project does not introduce new on-road heavy-duty diesel activity (freight, yard trucks, TRUs, buses, or truck-intensive land uses). Reconstruction of an existing elementary school does not increase long-term heavy-duty truck trips, freight movement, or truck idling. During construction, diesel off-road equipment will operate temporarily; however, this is not the focus of CERP's Heavy-Duty Mobile Source strategies.
4. CAMP Pollutant Priorities (PM2.5, diesel PM, NOx, VOCs, TACs)	**Consistent.** As discussed in AQ-B, the project would not result in significant short-term construction or long-term emissions above SJVAPCD GAMAQI thresholds. The project would have an insignificant increase in long-term emissions and therefore does not conflict with CAMP goals to reduce localized pollutants.
5. Cumulative Impact Framework for AB 617 Disadvantaged Communities	**Consistent with Mitigation.** Although the project is located in a high-burden AB 617 community, the lack of operational growth and the application of MM AQ-1 and AQ-2 ensures that the project would not contribute to worsening cumulative exposure trends identified in the CERP and CAMP.
6. Sensitive Receptor Protection (school site)	**Consistent with Mitigation.** The school itself is a sensitive receptor, as well as surrounding residential areas and a church. By implementing MM AQ-1 and AQ-2, the project is consistent with AB 617 goals to protect sensitive populations from localized emissions.

7. Enforcement and Compliance Measures (anti-idling, dust control, ATCMs)	**Consistent with Mitigation.** By implementing MM AQ-1 and AQ-2, the project is consistent with AB 617 goals for anti-idling requirements, fugitive dust controls, and diesel ATCMs. No new long-term emission sources would be introduced.
8. Community-Selected Measures (exposure reduction, buffers, filtration)	**Consistent.** The proposed reconstruction would be consistent with the AB 617 community exposure reduction goals because it inherently incorporates enhanced ventilation and filtration performance required by the 2025 Title 24 code, and because the project relocates the school farther away from nearby industrial land uses by shifting buildings south to north, reducing long-term pollutant exposure.
9. Early Coordination with SJVAPCD (CEQA review, design integration)	**Consistent.** The District would coordinate with SJVAPCD during the ISR process, NOP scoping period, and DEIR public comment period.
10. Consistency with Air Quality Plans ($PM_{2.5}$ SIP, ozone plans, CERP milestones)	**Consistent with Mitigation.** The project's lack of operational expansion, combined with compliance with construction-phase mitigation AQ-1 and AQ-2, ensures that the project does not interfere with regional $PM_{2.5}$ attainment strategies or CERP $PM_{2.5}$/diesel PM reduction targets.
Source: (SJVAPCD, 2023) (SJVAPCD, 2019)	

The impact of the proposed project on air quality plans is **significant**. The District's construction agent shall implement the following mitigation measures (MM):

MM-AQ-1: Use of Tier 4 Final (or Cleaner) Construction Equipment. Prior to the start of construction, the Design-Build Entity shall provide documentation to the Lead Agency demonstrating that all off-road diesel-powered construction equipment greater than 50 horsepower used on-site shall meet U.S. EPA/CARB Tier 4 Final emissions standards or shall utilize zero-emission or electric equipment where available.

If certain specialized equipment is not commercially available in Tier 4 Final configuration, the Design-Build Entity shall demonstrate to the Lead Agency that such equipment is unavailable within the regional rental market. In such cases, the Design-Build Entity shall employ all feasible controls, including but not limited to:

1. Use of Tier 4 Interim equipment only when Tier 4 Final is demonstrably unavailable;
2. Installation of CARB-verified diesel emission control devices on non-Tier-4 equipment;
3. Mandatory use of R99/R100 renewable diesel fuel, consistent with CARB's 2024 off-road diesel requirements;
4. Limiting operating hours and staging equipment away from sensitive receptors.

The Design-Build Entity shall submit equipment lists, tier certifications, and renewable diesel purchase records to the Lead Agency prior to grading permit issuance and quarterly thereafter until construction is complete.

MM-AQ-2: Heavy-Duty Vehicle and Equipment Anti-Idling Requirements. To reduce diesel particulate matter and NO_X emissions, all on-road heavy-duty trucks and off-road construction equipment operating on the project site shall comply with the California Air Resources Board (CARB) 5-minute idling limits for diesel vehicles and equipment under the Statewide Anti-Idling Airborne Toxic Control Measure (ATCM). The following measures shall be implemented:

1. Idling shall not exceed 5 minutes for any diesel-fueled on-road truck or off-road equipment, unless exempt under CARB regulations (e.g., for safety or manufacturer-specified cool-down periods).

2. Posted signage shall be installed at all construction entrances and equipment staging areas stating, "Idling Limit 5 Minutes – State Law."
3. Construction contracts shall include language requiring compliance with CARB idling restrictions, including the CARB Off-Road Diesel Regulation's idling policy requirements.
4. The Design-Build Entity shall maintain on-site logs demonstrating compliance and shall train all operators and subcontractors on idling limits prior to the start of construction.
   The Lead Agency shall conduct periodic inspections to verify compliance. Repeated violations may result in corrective actions, including removal of non-compliant sub-contractors from the site.

Effectiveness of Mitigation Measures
Through the implementation of Mitigation Measure AQ-1 and AQ-2 the proposed project's implementation would not increase in a criteria air pollutant or obstruct the implementation of applicable air quality plans. This impact would be considered **less than significant with mitigation incorporated.** No additional mitigation is required.

4.1.4.3.b. Impact AQ-B:

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

Less Than Significant
The proposed project is in the City of Fresno, within the SJVAB. The SJVAB is classified as nonattainment for the national 8-hour ozone and $PM_{2.5}$ standards and nonattainment for state 1-hour Ozone, 8-hour ozone, PM_{10}, and $PM_{2.5}$. Air quality impacts related to the proposed project may arise during both construction and operational phases. The following sections discuss the short-term construction and long-term operational air quality impacts associated with the project:

Short-term Construction Emissions

During construction, temporary increases in air pollutant emissions would occur. Although construction-related emissions are short-term and limited to the duration of construction activities, they can result in significant air quality impacts. The proposed project's construction would temporarily generate emissions from site grading, excavation, paving, painting, exhaust from construction equipment and worker trips, as well as the movement of equipment on unpaved surfaces. These activities would lead to increased emissions of ozone precursors (ROG and NOx) and particulate matter (PM). Ozone precursor emissions would primarily come from on-road and off-road vehicles and equipment, while PM emissions would depend on the extent of ground disturbance during grading and excavation, potentially affecting nearby sensitive land uses. Estimated annual construction emissions for the proposed project are presented in Table 10.

As shown in Table 10, the maximum unmitigated annual emissions from project construction are estimated at 0.27 TPY of ROG, 0.85 TPY of NOx, 1.09 TPY of CO, <0.005 TPY of SO_2, 0.11 TPY of PM_{10}, and 0.06 TPY of $PM_{2.5}T$. These emissions would remain below the SJVAPCD's significance thresholds of 10 TPY for ROG and NOx, 100 TPY for CO, 27 TPY for SO_2, and 15 TPY for PM_{10} and $PM_{2.5}T$.

Table 10: Annual Construction Emissions (Unmitigated)

	Annual Average Emissions (TPY)[1]

Construction Phase	ROG	NO_X	CO	SO_2	$PM_{10}E$	$PM_{10}D$	$PM_{10}T$	$PM_{2.5}T$
Phase 1								
Construction Year 2028	0.10	0.85	1.09	<0.005	0.03	0.04	0.07	0.04
Construction Year 2029	0.23	0.62	0.81	<0.005	0.02	0.01	0.03	0.02
Phase 2								
Construction Year 2029	0.04	0.23	0.28	<0.005	0.01	0.07	0.08	0.04
Phase 1 and 2 Construction Year 2029 Totals	0.27	0.85	1.09	<0.005	0.03	0.08	0.11	0.06
Maximum Annual Average Emissions:	0.27	0.85	1.09	<0.005	0.03	0.08	0.11	0.06
Significance Thresholds:	*10*	*10*	*100*	*27*	*N/A*	*N/A*	*15*	*15*
Exceeds Thresholds/Significant Impact?:	*No*	*No*	*No*	*No*	*N/A*	*N/A*	*No*	*No*

1. Based on CalEEMod computer modeling. Totals may not sum due to rounding. Does not include emission control measures. Refer to Appendix A for modeling results and assumptions.

Estimated unmitigated maximum-daily on-site construction emissions are summarized in Table 11. As noted in Table 11 construction of the proposed project would generate maximum on-site emissions of approximately 33.84 lbs/day of ROG, 38.13 lbs/day of NOx, 41.24 lbs/day of CO, 0.08 lbs/day of SO_2, 29.20 lbs/day of PM_{10}, and 12.39 lbs/day of $PM_{2.5}T$. Daily on-site construction emissions would not exceed the SJVAPCD's recommended localized ambient air quality significance thresholds of 100 lbs/day for any of the criteria pollutants.

TABLE 11: DAILY ON-SITE CONSTRUCTION EMISSIONS (UNMITIGATED)

	Maximum Daily Emissions (lbs/day)[1]							
Construction Phase	**ROG**	**NO_X**	**CO**	**SO_2**	**$PM_{10}E$**	**$PM_{10}D$**	**$PM_{10}T$**	**$PM_{2.5}T$**
Phase 1 (2028 – 2029)								
Demolition (2028)	1.33	12.17	14.46	0.02	0.45	0.34	0.79	0.46
Site Preparation	1.05	8.42	10.71	0.03	0.36	0.16	0.52	0.40
Grading	1.35	11.78	13.91	0.02	0.52	2.44	2.96	1.81
Interim Modular Building Installation	0.90	7.73	10.14	0.02	0.12	0.00	0.22	0.20
Building Remodel	0.57	4.90	7.08	0.01	0.22	0.00	0.12	0.11
New Building Construction (2028)	1.08	8.51	10.23	0.02	0.27	0.00	0.27	0.24
New Building Construction (2029)	0.97	8.18	10.17	0.02	0.24	0.00	0.24	0.22
Paving	0.65	5.42	8.19	0.01	0.19	0.00	0.19	0.17
Architectural Coating	30.24	0.79	1.11	<0.005	0.01	0.00	0.01	0.01
Phase 2 (2029)								
Demolition (2029)	1.30	11.60	14.37	0.02	0.42	0.37	0.79	0.45
Site Preparation	3.60	29.95	31.01	0.06	1.32	27.61	28.93	12.17

Grading	1.31	11.06	13.83	0.02	0.48	8.14	8.63	3.98
Paving	1.03	5.42	8.19	0.01	0.19	0.00	0.19	0.17
Architectural Coating	3.16	0.79	1.11	<0.005	0.01	0.00	0.01	0.01
Max Two Phase 1 2028 Sub-Phases Combined	2.68	23.95	28.37	0.05	0.97	2.78	3.75	2.27
Max Phase 1 2029 and Phase 2 2029 Sub-Phases Combined	33.84	38.13	41.24	0.08	1.56	27.61	29.20	12.39
Maximum Daily On-site Emissions:	33.84	38.13	41.24	0.08	1.56	27.61	29.20	12.39
Significance Thresholds:	*100*	*100*	*100*	*100*	*N/A*	*N/A*	*100*	*100*
Exceeds Thresholds/Significant Impact?:	*No*	*No*	*No*	*No*	*N/A*	*N/A*	*No*	*No*
1. Based on CalEEMod computer modeling. Totals may not sum due to rounding. Refer to Appendix B for modeling results and assumptions.								

Additionally, project construction would be required to comply with applicable SJVAPCD rules and regulations. This would further reduce construction related emissions. For these reasons, the impact of construction-generated emissions would be considered **less than significant**.

Long-term Operational Emissions

Table 12 summarizes the estimated increase of annual operational emissions for the proposed project compared to existing operation of the project site. Upon completion of the project (Phase 1 and 2), the project is expected to generate approximately 0.31 TPY of ROG, 0.14 TPY of NOx, 0.37 TPY of CO, and <0.005 TPY of SO_2, 0.01 TPY of PM_{10}, and <0.005 TPY of $PM_{2.5}$. These emissions would primarily result from building operations (including energy use), and area sources such as occasional use of cleaning products, architectural coatings, and maintenance activities. Operational emissions from the project in 2029 would remain below SJVAPCD's mass-emissions significance thresholds.

Table 12: Annual Long-term Operational Emissions (Unmitigated)

	Annual Operational Emissions (TPY)[1]					
Operational Phase/Year	**ROG**	**NO_x**	**CO**	**SO_2**	**PM_{10}**	**$PM_{2.5}$**
Phase 1, 2029						
Mobile Source	0.00	0.00	0.00	0.00	0.00	0.00
Area Source	0.30	<0.005	0.25	<0.005	<0.005	<0.005
Energy Use	0.01	0.14	0.12	<0.005	0.01	<0.005
Total:	0.31	0.14	0.37	<0.005	0.01	<0.005
Significance Thresholds (tons per year):	*10*	*10*	*100*	*27*	*15*	*15*
Exceeds Thresholds/Significant Impact?:	*No*	*No*	*No*	*No*	*No*	*No*
Phase 2, 2029						
Mobile Source:	0.00	0.00	0.00	0.00	0.00	0.00
Area Source:	<0.005	0.00	0.00	0.00	0.00	0.00
Energy Use:	0.00	0.00	0.00	0.00	0.00	0.00
Total:	<0.005	0.00	0.00	0.00	0.00	0.00

Significance Thresholds (tons per year):	*10*	*10*	*100*	*27*	*15*	*15*
Exceeds Thresholds/Significant Impact?:	*No*	*No*	*No*	*No*	*No*	*No*
TOTAL: Phase 1 and 2, 2029						
Mobile Source:	0.00	0.00	0.00	0.00	0.00	0.00
Area Source:	0.30	<0.005	0.25	<0.005	<0.005	<0.005
Energy Use:	0.01	0.14	0.12	<0.005	0.01	<0.005
Total:	0.31	0.14	0.37	<0.005	0.01	<0.005
Significance Thresholds (tons per year):	*10*	*10*	*100*	*27*	*15*	*15*
Exceeds Thresholds/Significant Impact?:	*No*	*No*	*No*	*No*	*No*	*No*

1. Emissions were calculated using the CalEEMod computer program.
2. Based on highest emissions between winter and summer operation.
Totals may not sum due to rounding.
Refer to Appendix B for modeling assumptions and results.

Table 13 summarizes the estimated increase of annual average daily on-site operational emissions compared to existing project site operations. As mentioned, maximum daily emissions would primarily stem from area sources, such as landscape maintenance activities and the use of consumer products. Upon completion of the project (Phase 1 and 2), maximum daily on-site emissions are estimated at 1.94 lbs/day of ROG, 0.78 lbs/day of NOx, 3.38 lbs/day of CO, <0.005 lbs/day of SO_2, 0.06 lbs/day of PM_{10}, and 0.06 lbs/day of $PM_{2.5}$.

Table 13: Annual Long-term Operational Emissions (Unmitigated)

	Maximum Unmitigated Daily Emissions (lb/day)[1]					
Operational Phase/Year	**ROG**	**NO_x**	**CO**	**SO_2**	**PM_{10}**	**$PM_{2.5}$**
Phase 1, 2029						
Mobile Source:	0.00	0.00	0.00	0.00	0.00	0.00
Area Source:	1.88	0.02	2.74	<0.005	<0.005	<0.005
Energy Use:	0.04	0.76	0.64	<0.005	0.06	0.06
Total:	1.92	0.78	3.38	<0.005	0.06	0.06
Significance Thresholds (lbs/day):	*100*	*100*	*100*	*100*	*100*	*100*
Exceeds Thresholds/Significant Impact?:	*No*	*No*	*No*	*No*	*No*	*No*
Phase 2, 2029						
Mobile Source:	0.00	0.00	0.00	0.00	0.00	0.00
Area Source:	0.02	0.00	0.00	0.00	0.00	0.00
Energy Use:	0.00	0.00	0.00	0.00	0.00	0.00
Total:	0.02	0.00	0.00	0.00	0.00	0.00
Significance Thresholds (lbs/day):	*100*	*100*	*100*	*100*	*100*	*100*
Exceeds Thresholds/Significant Impact?:	*No*	*No*	*No*	*No*	*No*	*No*
TOTAL: Phase 1 and 2, 2029						
Mobile Source:	0.00	0.00	0.00	0.00	0.00	0.00
Area Source:	1.90	0.02	2.74	<0.005	<0.005	<0.005
Energy Use:	0.04	0.76	0.64	<0.005	0.06	0.06
Maximum Daily On-Site Operational Emissions:	1.94	0.78	3.38	<0.005	0.06	0.06
Significance Thresholds (lbs/day):	*100*	*100*	*100*	*100*	*100*	*100*

Exceeds Thresholds/Significant Impact?:	*No*	*No*	*No*	*No*	*No*	*No*

1. Emissions were calculated using the CalEEMod computer program.
2. Based on highest emissions between winter and summer operation.
Totals may not sum due to rounding.
Refer to Appendix B for modeling assumptions and results.

Even at maximum levels, daily on-site emissions would remain below the SJVAPCD's localized ambient air quality significance threshold of 100 lbs/day for all criteria pollutants. For this reason, the impact of long-term operation of the proposed project would be considered **less than significant**.

As discussed above, the project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standards. This finding would be independently determined by the SJVAPCD through the required submission of an Indirect Source Review (ISR) Air Impact Application and final approval by the SJVAPCD. Therefore, the project impact would be **less than significant.**

4.1.4.3.c. Impact AQ-C:

Would the project expose sensitive receptors to substantial pollutant concentrations?

Less than Significant with Mitigation Incorporated
Sensitive land uses near the proposed project site consist mainly of education and residential land uses, as well as a church located to the north of the project site and medical offices that are located to the south. Long-term operational and short-term construction activities and emission sources that could adversely impact these nearest sensitive receptors are discussed, as follows:

Long-term Operation

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

Carbon Monoxide

Carbon monoxide (CO) is the primary criteria air pollutant of local concern for the proposed project. Under certain meteorological and traffic conditions, such as areas with heavy congestion, CO levels can reach unhealthy concentrations. When inhaled, CO is readily absorbed into the bloodstream, reducing oxygen delivery to the body and potentially causing health effects ranging from mild headaches to severe outcomes. Those most vulnerable include individuals with anemia and those suffering from chronic lung or heart conditions.

CO emissions from mobile sources are directly influenced by traffic volume, speed, and congestion. However, CO disperses quickly under normal atmospheric conditions, limiting its transport. As a result, CO modeling is recommended for sensitive land uses near signalized intersections expected to operate at poor levels of service (LOS). The project would not result in increased enrollment or student capacity, therefore the project would not significantly increase use and related vehicle trips resulting in poor LOS in the project vicinity, therefore long-term exposure to localized CO concentrations would be considered **less than significant**.

Landscape Maintenance Equipment

Operation of gas-powered lawn and landscape maintenance equipment, such as lawn mowers, string trimmers, and leaf blowers, generates emissions of volatile organic compounds (VOCs) and nitrogen oxides (NOx) from fuel combustion and evaporative losses. VOCs and NOx are ozone precursors that contribute to ground-level ozone formation, a regional air quality concern in the San Joaquin Valley Air Basin. Gas-powered lawn equipment also emits small amounts of carbon monoxide (CO); however, these emissions are typically localized and short-term in nature.

The continued use of gas-powered landscape maintenance equipment at the existing campus represents an ongoing operational condition and would not be a new or increased source of air pollutant emissions attributable to the proposed project. As such, emissions associated with existing lawn and landscape maintenance practices would not constitute a project-related operational air quality impact under CEQA.

Therefore, operational air quality impacts associated with landscape maintenance equipment would be **less than significant**.

Soil Contamination

As discussed in Section 4.3.4.2.a *Impact HAZ-A*, environmental investigations conducted at the project site identified VOCs in subsurface soil gas associated with a known regional groundwater contamination plume. Although certain soil gas concentrations exceeded applicable screening levels, indoor air sampling conducted within existing on-site buildings detected VOC concentrations below applicable health-based screening levels. Based on the results of the site investigations and the absence of indoor air concentrations of concern, future occupants would not be exposed to substantial concentrations of toxic air contaminants through the vapor intrusion pathway. Therefore, impacts related to operational TAC exposure would be **less than significant**.

Short-term Construction

Naturally Occurring Asbestos

Naturally occurring asbestos, designated as a TAC by CARB in 1986, is commonly found in areas with ultramafic rock throughout California. However, the project site is not located near any regions likely to contain ultramafic rock (U.S Geologic Survey, 2011). Therefore, the risk of exposure to naturally occurring asbestos during construction is considered **less than significant.**

Asbestos-Containing Materials

Demolition activities have the potential to affect air quality if asbestos-containing materials (ACM) are present and improperly handled. ACM may occur in buildings constructed prior to 1970 and in materials such as exterior stucco, flooring, pipe insulation, and other building components. Disturbance of ACM is regulated under the National Emission Standards for Hazardous Air Pollutants (NESHAP) for asbestos (40 Code of Federal Regulations Part 61, Subpart M), which establishes requirements for pre-demolition inspection, notification, removal, handling, and disposal of regulated asbestos-containing materials. These requirements are administered locally by the San Joaquin Valley Air Pollution Control District (SJVAPCD) through Rule 4002 (San Joaquin Valley Air Pollution Control District, 2007).

In accordance with these regulatory requirements, the District conducted a hazardous building materials survey of all buildings proposed for demolition at the project site. The survey, prepared by Forensic Analytical Consulting

Services (FACS), identified non-friable asbestos-containing materials in all permanent buildings and one portable building, including exterior stucco, vinyl flooring tiles and mastic, pipe insulation, and sink coatings (FACS, 2026).

As required by federal, state, and local regulations, all identified ACM would be properly abated prior to demolition by a Cal/OSHA-certified asbestos abatement contractor. Required notifications would be submitted to the SJVAPCD, and all ACM would be removed, handled, and disposed of in accordance with Asbestos NESHAP standards and SJVAPCD Rule 4002 before demolition activities commence. Compliance with these mandatory requirements is part of the project design and implementation.

Because pre-demolition asbestos inspection and abatement are required under existing regulations and would be implemented as part of the project, demolition activities would not result in the release of asbestos fibers or expose workers or nearby sensitive receptors to hazardous levels of asbestos. Therefore, potential impacts related to asbestos during demolition would be **less than significant.**

Lead-Coated Materials

Demolition of structures constructed prior to 1978 has the potential to affect air quality and human health if lead-based paint or other lead-containing materials are improperly disturbed. Lead-based paint is commonly present in older buildings, and certain demolition or surface preparation activities, such as abrasive blasting or heat-based paint removal, can generate airborne lead dust or fumes if not properly regulated.

Activities that involve the disturbance of lead-containing materials are subject to federal and state regulations, including the Occupational Safety and Health Administration (OSHA) Lead in Construction Standard (29 Code of Federal Regulations Section 1926.62) and California Code of Regulations, Title 8, Section 1532.1. These regulations establish mandatory requirements for worker protection, handling, containment, and disposal of lead-containing materials during construction and demolition activities. In addition, lead-containing debris generated during demolition must be managed and disposed of in accordance with applicable U.S. Environmental Protection Agency (EPA) and state requirements.

The District evaluated the presence of lead-based coatings in buildings proposed for demolition through a hazardous building materials survey conducted by Forensic Analytical Consulting Services (FACS). The survey identified lead-based paint on select surfaces within Buildings A, B, C, D, H, I, and G (the MPR) (FACS, 2026). The project would not involve abrasive blasting, heat-based paint removal, or other activities that would intentionally disturb lead-based coatings in a manner that would generate airborne lead emissions.

As required by applicable regulations, buildings containing lead-based paint would be demolished using regulated work practices, and demolition debris would be properly handled, transported, and disposed of in compliance with the OSHA Lead in Construction Standard and the EPA Renovation, Repair and Painting (RRP) Rule (40 CFR Part 745). Compliance with these mandatory regulatory requirements is part of project implementation and would minimize the potential for lead-containing dust to become airborne during demolition activities.

Because lead-containing materials would be managed in accordance with existing federal and state regulations and no activities that would generate uncontrolled airborne lead emissions would occur, demolition of lead-painted structures would not result in substantial exposure of workers or nearby receptors. Therefore, potential impacts related to lead-based paint during demolition would be **less than significant.**

Soil Contamination

Construction activities have the potential to generate dust and airborne contaminants through grading, excavation, and other ground-disturbing activities. As discussed in Section 4.3.4.2.b, *Impact HAZ-B*, environmental site investigations conducted at the project site identified a limited area of lead-impacted soil within parking lot planter areas south of Buildings C and D. To prevent exposure of workers and nearby sensitive receptors to lead-contaminated soil or dust, Mitigation Measure HAZ-1 would require appropriate characterization, handling, and management of contaminated soil during construction activities. In addition, the project would be required to comply with SJVAPCD Regulation VIII dust control requirements, which would minimize the generation and off-site transport of fugitive dust. The District's construction agent shall implement Mitigation Measure HAZ-1 and required dust control measures, air quality impacts associated with contaminated soil disturbance during construction would be **less than significant with mitigation incorporated.** No additional mitigation is required.

Localized PM Concentrations

Fugitive dust emissions would primarily result from site preparation, excavation, grading, and vehicle movement on both unpaved and paved surfaces. If left uncontrolled, these emissions could contribute to health impacts to nearby receptors, especially to sensitive receptors. Given the proximity of the project to the students of Calwa Elementary School, localized PM concentrations could lead to a significant impact to air quality. However, the project would be required to prepare and submit a Fugitive Dust Control Plan (FDCP), receive approval from the SJVAPCD, and implement the FDCP during construction. Implementation of a FDCP per SJVAPCD Regulation VIII – Fugitive PM_{10} Prohibitions, would include measures to reduce PM emissions including, but not limited to:

1. Maintaining visible dust emissions below 20% opacity during all dust-producing activities.
2. Pre-watering work areas and disturbed soils to limit visible dust emissions.
3. Applying water or chemical suppressants to unpaved roads, access routes, and stockpiles to maintain a stabilized surface.
4. Limiting the area of active disturbance through phased construction.
5. Preventing trackout onto paved public roads and cleaning any trackout immediately in compliance with Rule 8041.
6. Covering or stabilizing all haul trucks transporting bulk materials.
7. Reducing vehicle speeds on unpaved areas and restricting unauthorized access.

Through the implementation of a FDCP, the impact of PM emissions would be **less than significant impact**.

Localized Diesel Particulate Matter

Construction of the project would generate short-term diesel particulate matter (DPM) emissions from off-road equipment and on-road diesel trucks, which could temporarily increase localized concentrations near nearby sensitive receptors. Because DPM is a toxic air contaminant associated with cancer risk, a screening-level health risk prioritization analysis was conducted.

The analysis used the California Air Pollution Control Officers Association (CAPCOA) screening methodology, modified to reflect the project's limited construction duration (approximately 15 months), rather than the standard 70-year exposure assumption. A conservative approach was applied, including total project emissions, the value for emissions per year and assuming close proximity between emission sources and receptors.

Using standard CAPCOA methods, the project would screen as high priority; however, this result reflects unrealistic long-term exposure assumptions for temporary construction activities. When adjusted to account for the short-

term construction duration, the project's modified score is approximately 1.69, which is at the low end of the intermediate range and effectively represents a low-priority screening outcome under conservative assumptions.

The analysis incorporates implementation of Mitigation Measure MM AQ-1 requiring Tier 4 Final construction equipment, which substantially reduces DPM emissions. Additional reductions from MM AQ-2 (idling limits) were not quantified in the screening analysis nor was the absence of students during summer break, providing further conservatism.

Based on the temporary and intermittent nature of construction emissions, conservative screening assumptions, and the implementation of Mitigation Measures AQ-1 and AQ-2, construction-related DPM emissions would not expose nearby sensitive receptors to a substantial cancer risk. Therefore, impacts related to construction toxic air contaminant emissions would be **less than significant with mitigation incorporated.**

4.1.4.3.d. Impact AQ-D:

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

Less than significant

The project would not construct or operate any of the types of common facilities identified by SJVAPCD as producing significant odors. During construction, the project may produce odors associated with construction, such as vehicle exhaust odors, asphalt degassing, and paint fumes, although these odors are expected to be intermittent, small in scale, and would not be present once construction is complete.

The completed project would retain its existing land use, elementary school campus, and would not result in any new odor sources. Therefore, the project would not produce significant odors that would adversely affect a substantial number of people. This impact would be **less than significant**.

4.2 Historic Architectural Resources

As described in Section 2.4.1 Historic Era Buildings, several buildings are identified as possible historic buildings. A Historic Architecture Survey was completed. The impact of the project on historic architectural resources are evaluated in this DEIR.

4.2.1 Introduction

This section evaluates the project's impact on historic architectural resources. Impacts to archeological resources are addressed separately in Section 4.6 *Archeological Resources*. This section describes the regulatory framework for and existing environmental setting for the project area; identifies historic architectural resources that may be affected by the project; evaluates potential direct and indirect impacts on those resources; and identifies mitigation measures to avoid or reduce the potential adverse impacts.

The information and analysis in this section are based on the *Historic Architectural Survey Report (HASR) for the Calwa Elementary School Reconstruction Project*, Hattersley-Drayton, 2026 (see Appendix C).

4.2.1.3 Definitions

Under Section 15064.5(a) of the CEQA Guidelines, a historical resource is defined as a resource that is listed in, or determined eligible for listing in, the California Register of Historical Resources (California Register). A resource is also presumed to be a historical resource if it is either: (1) identified as significant in a local register of historical resources, or (2) identified as significant in a historical resources survey meeting the requirements of Public Resources Code Section 5024.1(g), unless a preponderance of the evidence demonstrates that the resource is not historically or culturally significant. In addition, CEQA Section 21084.1 authorizes a lead agency to determine that a resource qualifies as a historical resource even if it does not meet these criteria.

For purposes of this EIR, the term "historic architectural resource" is used to distinguish architectural resources from archaeological resources, which may also qualify as historical resources under CEQA.

4.2.2 Environmental Setting

4.2.2.1 History of Calwa and Calwa Elementary School

The project is located within the community of Calwa, which developed as a railroad depot community during the early growth of the Fresno area. Calwa was initially served by the San Francisco and San Joaquin Valley Railroad, which began passenger service on September 10, 1897. In 1898, the rail line was acquired by the Atchison, Topeka and Santa Fe Railway, which later developed the Calwa Santa Fe Depot in 1922 (Hattersley-Drayton, 2026).

The name "Calwa" originated from the California Wine Association, which began construction of a $2.5 million winery and distillery in 1896. Wine production and railroad access were major factors in the establishment and early economic development of the community. In 1913, the Santa Fe Railroad announced plans to construct a roadhouse and new rail shops in Calwa and relocated approximately 300 worker families from Fresno to the area. New residential tracts were subsequently subdivided, and local newspapers frequently promoted real estate opportunities within the growing community (Hattersley-Drayton, 2026).

The rapid population growth associated with railroad expansion created a need for additional educational facilities. The first school serving the area was the Paige School of the Paige District, constructed in 1887 southwest of the intersection of Cedar Avenue and Jensen Avenue, outside the current Calwa Elementary School project site. By 1912, the Paige School no longer adequately served the growing population, and in 1913 a new school was constructed at the present Calwa Elementary School site. Over time, additional buildings and improvements were added to accommodate continued growth within the Calwa community (Hattersley-Drayton, 2026).

4.2.2.2 Project Site

As of the date of this EIR, there are no buildings at the site that pre-date 1945. All permanent buildings at the campus were constructed between 1945-1970 or are temporary portable classroom additions. The project site includes all of the existing Calwa Elementary school and surrounding road/sidewalk right-of-way. The proposed project would entail the demolition of the MPR (Building G), Building E, Building F, and portable buildings P11, P12, and P13. The project would also modernize Building I with internal modifications and code updates to convert it to a library, and complete internal remodeling of Buildings A, B, C, D, H, J (Building J also referred to as "Library"), and complete fire and security alarm upgrades for these buildings, as well as portable buildings P1 through P10.

4.2.2.3 Description of Historic Era Buildings

4.2.2.3.a. Building J/Library Building & Classroom Buildings C and D Complex

Building J/Library Building and Classroom Buildings C & D were designed by architect William D. Coates Jr. These buildings are the oldest extant buildings at the campus, constructed in 1945. This building complex are an excellent example of the new (at the time) school architectural model in California of the "finger plan".

Building C and D are a row of connected one-deep classrooms, oriented east/west with south-facing double hung sash windows for natural lighting, and covered pipe column supported corridors connecting Classroom Buildings C and D, and the Library. Buildings C and D are wood framed stucco clad buildings. Classroom Building D connects to a kindergarten portion of the building at the east (part of Building D), where the kindergarten portion has a rectangular footprint with a south-facing inset front entrance porch supported by three double sets of metal poles. The roof of Building D is complex where the kindergarten portion has a medium pitch gable center and a flat boxed cornice and simple frieze painted green, and the classroom portion has a medium pitch side gabled roof of composition shingles. A covered pass through the middle of Buildings C and D leads to another pass-through Buildings A and B. Tall windows on the north face are divided sash, although many lower windows have been infilled.

Building J/Library Building is a one-story structure with a rectangular footprint and a prominent row of large, east-facing, double-hung sash windows. The building is of wood-frame construction and is clad in stucco. It is topped by a medium-pitch, truncated hip roof covered with composite shingles. The roof eaves project beyond the wall plane, with exposed rafters visible on the north and south elevations. The east and west elevations feature plain boxed cornices painted green, along with wide fascia trim painted white. Six large double-hung sash windows are arranged along the east elevation. This façade also includes a partial-width, flat-roofed porch supported by three metal poles. Beneath the cornice line, six fixed-pane clerestory windows are present. The south elevation of the building was later painted in 2002 with an artistic mural depicting the Calwa eagle mascot set within a natural landscape.

The architect, W.D. Coates, served as the California State Architect from 1909 to 1911 and later partnered with H.B Traver to design numerous schools in Fresno County. Among the most important projects were several schools, including Fresno High School (1920), Hanford High School (1920), and Porterville High School (1921) (Hattersley-Drayton, 2026). Other notable historic buildings designed by W.D. Coates include the Fresno Memorial Auditorium (1935-1936) and the County of Fresno Hall of Records (1935-1937) (Pacific Coast Architecture Database, n.d.) (Pacific Coast Architecture Database, n.d.).

4.2.2.3.b. Multi-purpose Room (MPR)/Building G

The Multi-purpose Room (MPR)/Building G was designed by Franklin and Simpson Architects (Charles Franklin and Alistair Simpson) and constructed in 1947. The building is a distinctive example of Mid-Century Modern architecture.

The Multi-Purpose Building/Building G is centrally located within the campus, is rectangular in plan, and is oriented toward the south. The building is of frame construction and is clad in a combination of cement plaster and brick. Brickwork incorporates Roman-style brick arranged in geometric square patterns that correspond to the window design on both the primary (south) and rear (north) elevations. The symmetrical south façade features paired solid doors at the west and east ends and is articulated by brick piers at both ends and at the midpoint.

The building is one and one-half stories tall. The clerestory has been enclosed and would be visible only from the north elevation. A boxed cornice with a slight cantilever is finished with green tile. The east elevation faces the playground and is predominantly brick, with a single door located near the north end. The south entrance features an inset porch with brick walls and wall mounted concrete benches.

Interior features include a fully raised stage with a wood floor and a kitchen located in the northeast corner. Windows are of a pivot type and would be operable to facilitate air circulation.

Charles Franklin was a leading architect in the Fresno region. In 1912 he moved to Fresno to work for the R.F. Felchlin Company, a design-build firm responsible for the classical revival of office buildings along Fresno's Fulton Street. In 1933 Franklin designed the Art Deco Gateway of Kearney Boulevard financed in part by Fresno's Italian community. In 1937 he partnered with Ernes Kump Jr., a passionate modernist. Together they designed several notable buildings including the Fresno City Hall (1941) (now the Fresno City Hall Annex) (Moore, 2025). Other notable historic buildings designed by Franklin include the Bank of Italy Building (1917) (also designed by Simpson) (Historic Fresno, n.d.), the County of Fresno Hall of Records (1935-1937) (Pacific Coast Architecture Database, n.d.), and the Radin-Kamp Department Store (1924) (Historic Fresno, n.d.).

4.2.2.3.c. Classroom Buildings E and F

Classroom Buildings E and F were built in 1949 and designed by an unknown architect. These parallel buildings were designed in the Finger Plan style and created a separate complex in the northwest of the school. Both structures are one story in height and one room deep, and they consist of wood-frame construction with stucco exterior cladding. Each building features a medium-pitched, side-gabled roof.

The roof of Building F extends along the east elevation to form a covered walkway that connects to Building E. This shaded walkway is supported by a series of metal posts painted green. Student restroom facilities are located at the east end of Building F.

The south elevations of both buildings contain clerestory windows, while the north elevations feature large double-hung sash windows, with the lower sashes largely infilled. Classroom access doors are present on both the north and south elevations of each structure. Of architectural interest, the west elevations of both buildings display a three-dimensional geometric wood design that provides additional visual articulation.

4.2.2.3.d. Classroom Buildings A and B

Building A and B were constructed in 1957 and designed by an unknown architect, potentially Benjamin Lippold based on the architectural design and his recent at the time on Building H.

Classroom Buildings A and B are both Six classroom buildings arranged north of and parallel to Classroom Buildings C and D and are configured in a "finger plan," such that each structure are one story in height and one room deep. Unlike Classroom Buildings C and D, restroom facilities are located at the west end of each classroom row. Construction consists of wood framing with stucco exterior finishes. A continuous, low-pitched, side-gabled roof unify the structures, and a covered passageway separate Classroom Buildings A and B while connecting to Buildings C and D at the southern end of the complex. At the south elevation of Wings 3 and 4, the roof extends outward to form a covered walkway supported by metal posts painted green. A single Roman-style brick pier is present at each end of the classroom row, a detail of architectural interest that may suggest the involvement of architect Benjamin Lippold, who designed the 1963 addition and is known for incorporating Roman brick as a signature element. Clerestory windows line the south elevations, while double-hung sash windows, many of which are infilled at the lower portions, provide diffuse natural light along the north elevations. A landscaped courtyard with mature trees and seating is situated between the two northern wings and those to the south, and a small playground area is located on the north side of the buildings. Each classroom is accessed by a single exterior door.

4.2.2.3.e. Classroom Building H

Classroom Building H was designed by architect Benjamin Lippold and constructed in 1963. The building is a classroom wing arranged in a modified finger plan and is located at the southwest corner of the campus and aligns with Classroom Buildings C and D. In contrast to these earlier classroom wings, this building is two rooms deep and contains multiple classrooms, an office area, and a nurse's room, all situated at the east end of the structure. The west elevation includes a formal entrance featuring a low-pitched, front-facing gable roof, a pair of solid double doors, and Roman brick cladding flanking the doors on both the north and south sides. A sign reading "Calwa Elementary School" is suspended between the entrance doors.

The classroom and office spaces feature low-pitched, side-gabled roofs, and the building consists of wood-frame construction with stucco cladding. The stucco exterior is vertically scored at approximately four-foot intervals, serving as a decorative element. Additional character-defining features include brick tile accents along the base of the walls and Roman-style brick piers at the ends of the building.

Windows on the north elevation consist of large horizontal sliders, while windows on the south elevation incorporate louvers to filter sunlight. Roof overhangs extend along both the north and south elevations to form shaded corridors, which are supported by a row of green-painted metal posts.

4.2.2.3.f. Building I

Building I was constructed in 1970 and designed by an unknown architect, potentially Benjamin Lippold based on architectural design. Building I, a.k.a. the Resource Center, is a one-story building with a nominally rectangular plan that faces east toward the playground area. The principal elevation features a reduced footprint and projects

outward approximately 12 feet from the main plane of the building. All building entrances are recessed, contributing variety to the overall formal composition.

The principal east façade includes a pair of solid double doors flanked by two groupings of three fixed horizontal windows. Roman-style brick veneer, laid in regular courses, frames the doors on both sides. Roman brick detailing also appears as articulation at the rear and north entrances.

The building has a flat roof that cantilevers approximately one foot beyond the exterior walls on all elevations. Beneath the cornice, a broad stucco frieze is present and is vertically scored, a treatment that also appears on the 1963 classroom and office wing. A coping element at the top of the cornice is painted green and provides a contrasting accent to the exterior finish.

4.2.2.3.g. Portable Classroom Buildings

There is a total of 13 portable classroom buildings at Calwa Elementary School with a cluster of ten buildings in the southeast and three in the northwest. These are utilitarian buildings added later to the campus and do not have significant historic architectural value and are therefore not discussed or evaluated further in this EIR.

4.2.2.4 Overview of California Register Significance Evaluation

District staff have reviewed the Historic Architectural Survey Report (HASR) for the Calwa Elementary School Reconstruction Project, included in Appendix C. The following provides a summary of the California Register eligibility evaluations as presented in the report.

4.2.2.4.a. Building J/Library Building & Classroom Buildings C and D Complex

Classroom Buildings C and D was determined to be individually eligible for listing (as one resource) in the California Register under Criteria 1 and 3. The Building J/Library Building was also determined to be individually eligible for listing in the California Register under Criteria 1 and 3. For Criterion 1 (events), the buildings are an early example of the Finger Plan architectural school design style in California and the oldest extant buildings at Calwa Elementary School. Under Criterion 3 (design/construction) the buildings are a pristine example of the work of an important creative individual who possessed high artistic values, W.D. Coates.

4.2.2.4.b. Building G/Multi-purpose Room (MPR)

The Building G/MPR was determined to be individually eligible for listing in the California Register under Criteria 1 and 3. Under criterion 1 (events), the building is one of the earliest buildings at Calwa Elementary School. Under Criterion 3 (design/construction) the building is an excellent example of Mid-Century Modern design and the work of an important creative individual who possessed high artistic values, both Charles Franklin and Alistair Simpson.

4.2.2.4.c. Classroom Buildings E and F

Classroom Buildings E and F were found to not be eligible for listing in the California Register under any criteria. No original buildings plans have been located for and thus they are not associated with a major architect. Although the buildings are early additions to the school, they do not have the distinctive quality of Classroom Buildings C and D.

4.2.2.4.d. Classroom Buildings A and B

Classroom Buildings A and B were found to not be eligible for listing in the California Register under any criteria. No original buildings plans have been located for and thus they are not associated with a major architect. There is a potential that the buildings were designed by Benjamin Lippold, who is not a major architect of note. Although the buildings are examples of the Finger Plan style, they are later implementations of the style, constructed in 1959.

4.2.2.4.e. Classroom Building H

Classroom Building H was found to not be eligible for listing in the California Register under any criteria. The buildings were designed by Benjamin Lippold, who is not a major architect of note. The building design is a modified cluster plan style and is common for buildings designed during its period.

4.2.2.4.f. Building I

Classroom Building I was found to not be eligible for listing in the California Register under any criteria. No original buildings plans have been located for and thus they are not associated with a major architect. There is a potential that the building was designed by Benjamin Lippold, who is not a major architect of note. The building is an example of the Cluster Plan style and uses common Mid-Century modern style used during the period of 1963 and is a standard building of the era and is not distinguished architecturally.

4.2.3 Regulatory Setting

The following section summarizes relevant federal, state, and local plans and policies related to cultural resources.

4.2.3.1 Federal Laws, Regulations, and Policies

Although the proposed project is not anticipated to require compliance with section 106 of the National Historic Preservation Act, the federal guidelines for the treatment of cultural resources are relevant for determining whether cultural resources, as defined under CEQA, are present, and for guiding the treatment of such resources. The following sections summarize the relevant federal regulations and guidelines.

4.2.3.1.a. National Historic Preservation Act

The National Historic Preservation Act (NHPA) of 1966 was enacted primarily to acknowledge the importance of protecting the heritage of the United States from rampant federal development. It was the triumph of more than a century of struggle by a grassroots movement of committed preservationists. The following describes the NHPA's responsibilities:

- Set the federal policy for preserving our nation's heritage.
- Establish a federal-state and federal-tribal partnership.
- Establish the National Register of Historic Places (National Register) and National Historic Landmarks Programs.
- Mandate the selection of qualified state historic preservation officers (SHPOs).
- Establish the Advisory Council on Historic Preservation.
- Charge federal agencies with responsible stewardship.
- Establish the role of certified local governments within the states.

The regulations supporting the federal policy for historic preservation set by the NHPA can be found in Code of Federal Regulations (CFR) title 36, part 800 (36 CFR 800), "Protection of Historic Properties." This provides guidelines on how to follow the policy set forth in the NHPA.

4.2.3.1.b. National Register of Historic Places

The National Register is the nation's master inventory of cultural resources worthy of preservation. It is administered by the National Park Service, which is represented at the state level by the SHPO. The National Register includes listings of buildings, structures, sites, objects, and districts that possess historic, architectural, engineering, archeological, or cultural significance at the federal, state, or local level. Resources that are listed in or have been found by the SHPO to be eligible for listing in the National Register are called historic properties. Under the NHPA, a property is considered significant if it meets the NHPA listing criteria in 36 CFR 60.4, which read as follows:

> The quality of significance in American history, architecture, archeology, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association and
>
> a) that are associated with events that have made a significant contribution to the broad patterns of our history; or
> b) that are associated with the lives of persons significant in our past; or
> c) that embody the characteristics of a type, period, or method of construction, or that represent works of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
> d) that have yielded, or may be likely to yield, information important in prehistory or history.

Although there are exceptions, certain kinds of resources are not usually considered for listing in the National Register: religious properties, moved properties, birthplaces and graves, cemeteries, reconstructed properties, commemorative properties, and properties that have achieved significance within the past 50 years.

In addition to meeting at least one of the four criteria, a property or district must retain integrity, meaning that it must have the ability to convey its significance through the retention of seven aspects, or qualities, that in various combinations define integrity:

- Location: The place where the historic property was constructed.
- Design: The combination of elements that create the form, plans, space, structure, and style of the property.
- Setting: The physical environment of the historic property, inclusive of the landscape and spatial
- relationships of the buildings.
- Materials: The physical elements that were combined or deposited during a particular period of time and in a particular pattern of configuration to form the historic property.
- Workmanship: Physical evidence of the crafts of a particular culture or people during any given period in history.
- Feeling: The property's expression of the aesthetic or historic sense of a particular period of time.
- Association: Direct link between an important historic event or person and a historic property.

Properties that are listed in the National Register, as well as properties that are formally determined to be eligible for listing in the National Register, are automatically listed in the California Register and therefore are considered historical resources under CEQA (California Code of Regulations, Title 14, Section 4851, 2025).

4.2.3.1.c. Secretary of the Interior's Standards for the Treatment of Historic Properties

The *Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings* (Secretary's Standards) were published and codified as 36 CFR 68 in 1995 and updated in 2017 (U.S. Department of the Interior, National Park Service, 2017). The Secretary's Standards for rehabilitation have been adopted by local government bodies across the country, for reviewing proposed work on historic properties under local preservation ordinances. The Secretary's Standards provide a useful analytical tool for understanding and describing the potential impacts of changes to historic resources and are used to inform CEQA review. Developed by the National Park Service for reviewing certified rehabilitation tax credit projects, the rehabilitation standards provide guidance for reviewing work on historic properties. The rehabilitation standards are as follows:

1. A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces, and spatial relationships.
2. The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces, and spatial relationships that characterize a property will be avoided.
3. Each property will be recognized as a physical record of its time, place, and use. Changes that create false sense of historical development, such as adding conjectural features or elements from other historic properties, will not be undertaken.
4. Changes to a property that have acquired historic significance in their own right will be retained and preserved.
5. Distinctive materials, features, finishes, and construction techniques or examples of craftsmanship that characterize a property will be preserved.
6. Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture, and, where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.
7. Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.
8. Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.
9. New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work will be differentiated from the old and will be compatible with the historic materials, features, size, scale, and proportion, and massing to protect the integrity of the property and its environment.
10. New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

Conformance with all rehabilitation standards does not determine whether a project would cause a substantial adverse change in the significance of a historical resource under CEQA. Rather, projects that comply with the standards benefit from a regulatory presumption that they would have a less-than-significant adverse impact on a historic resource. Projects that do not comply with the rehabilitation standards may or may not cause a substantial

adverse change in the significance of a historic resource and would require further analysis to determine whether the historic resource would be "materially impaired" by the project under CEQA Guidelines section 15064.5(b).

4.2.3.2 State Laws, Regulations, and Policies

California implements the National Historic Preservation Act through its statewide comprehensive cultural resource preservation programs. The California Office of Historic Preservation, an office of the California Department of Parks and Recreation, implements the policies of the NHPA on a statewide level. The California Office of Historic Preservation also maintains the California Historical Resources Inventory. The SHPO is an appointed official who implements historic preservation programs within the state's jurisdiction.

4.2.3.2.a. California Environmental Quality Act

CEQA is the principal statute governing environmental review of projects in California. To be considered a historical resource, a property must generally be at least 50 years old; when acting as the CEQA lead agency. A *historical resource* is defined in CEQA Guidelines section 15064.5 as a cultural resource (i.e., a built-environment resource, archaeological resource, or human remains) that meets at least one of the following criteria:

1. A resource listed in or determined to be eligible by the State Historical Resources Commission, for listing in the California Register.
2. A resource included in a local register of historical resources, as defined in Public Resources Code section 5020.1(k) or identified as significant in a historical resource survey meeting the requirements of Public Resources Code section 5024.1(g), shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.
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 may be considered to be a historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register.
4. The fact that a resource is not listed in, or determined to be eligible for listing in the California Register, not included in a local register of historical resources (pursuant to section 5020.1(k) of the Public Resources Code), or identified in a historical resources survey (meeting the criteria in Public Resources Code section 5024.1[g]) does not preclude a lead agency from determining that the resource may be a historical resource as defined in Public Resources Code section 5020.1(j) or 5024.1.

Therefore, under the CEQA Guidelines, even if a resource is not included in any federal, state, or local register or identified in a qualifying historical resources survey, a lead agency may still determine that any resource is a historical resource for the purposes of CEQA if there is substantial evidence supporting such a determination. A lead agency must consider a resource to be historically significant if it finds that the resource meets the criteria for listing in the California Register.

CEQA requires a lead agency to determine whether a proposed project would have a significant effect on important historical resources or unique archaeological resources. If a resource is neither a unique archaeological resource nor a historical resource, the CEQA Guidelines note that the effects of the project on that resource shall not be considered a significant effect on the environment (CEQA Guidelines section 15064.5[c][4]). As noted

above, projects that comply with the Secretary's Standards benefit from a regulatory presumption under CEQA that they would have a less-than-significant impact on a historical resource. Projects that do not comply with the Secretary's Standards may or may not cause a substantial adverse change in the significance of a historical resource and must be subject to further analysis to assess whether they would result in material impairment of a historical resource's significance.

4.2.3.2.b. California Register of Historical Resources

The California Register, administered by the California Office of Historic Preservation, is the authoritative guide to historical and archeological resources that are significant within the context of California's history. The eligibility criteria for inclusion in the California Register are based on and correspond to the National Register criteria. Under CEQA, certain resources are determined to be automatically included in the California Register, including California properties that are formally eligible for or listed in the National Register. These resources are considered historical resources by the San Francisco Planning Department for the purposes of CEQA. The criteria used for determining eligibility for listing in the California Register closely parallel those developed by the National Park Service for the National Register but also include relevance to California history. To be eligible for listing in the California Register as a historical resource, a resource must meet at least one of the following criteria (Public Resources Code section 5024.1[c]):

- **Criterion 1 (Event):** Resources that are associated with events that have made a significant contribution to the broad patterns of local or regional history or the cultural heritage of California.
- **Criterion 2 (Person):** Resources that are associated with the lives of persons important to history.
- **Criterion 3 (Design/Construction):** Resources that embody the distinctive characteristics of a type, period, region, or method of construction, or represent the work of an important creative individual, or possess high artistic values.
- **Criterion 4 (Information Potential):** Resources or sites that have yielded or have the potential to yield information important in prehistory or history.

In addition, to be considered eligible for listing in the California Register, a historical resource must possess integrity. Consideration of integrity for evaluation of California Register eligibility closely follows the seven aspects of integrity that apply to the National Register (listed above).

4.2.3.3 Local Laws, Regulations, and Policies

The City of Fresno General Plan Historic and Cultural Resources Element addresses issues related to historic preservation through policies that emphasize preserving notable landmarks and historic features, remodeling older buildings, and respecting the character of older buildings adjacent to new development. General plan objectives and policies related to cultural resources that are relevant to the proposed project are identified below.

Objective HCR-2	Identify and preserve Fresno's historic and cultural resources that reflect important cultural, social, economic, and architectural features so that residents will have a foundation upon which to measure and direct physical change.
Policy HCR-2-a	Identification and Designation of Historic Properties. Work to identify and evaluate potential historic resources and districts and prepare nomination forms for Fresno's Local Register of Historic Resources and California and National registries, as appropriate.

Policy HCR-2-b	Historic Surveys. Prepare historic surveys according to California Office of Historic Preservation protocols and City priorities as funding is available.
Policy HCR-2-c	Project Development. Prior to project approval, continue to require a project site and its Area of Potential Effects (APE), without benefit of a prior historic survey, to be evaluated and reviewed for the potential for historic and/or cultural resources by a professional who meets the Secretary of Interior's Qualifications. Survey costs shall be the responsibility of the project developer. Council may, but is not required, adopt an ordinance to implement this policy.
Policy HCR-2-g	Demolition Review. Review all demolition permits to determine if the resource scheduled for demolition is potentially eligible for listing on the Local Register of Historic Resources. Consistent with the Historic Preservation Ordinance, refer potentially eligible resources to the Historic Preservation Commission and as appropriate to the City Council.
Policy HCR-2-i	Preservation Mitigation Fund. Consider creating a preservation mitigation fund to help support efforts to preserve and maintain historic and cultural resources.
Policy HCR-2-n	Property Database and Informational Systems. Identify all historic resources within the city designated on the Local, State, or National register, and potential significant resources (building, structure, object or site) in existence for at least 45 years, and provide this information on the City's website.
Objective HCR-3	Promote a "New Beautiful City" ethos by linking historic preservation, public art, and planning principles for Complete Neighborhoods with green building and technology.
HCR-3-a	Adaptive Reuse. Promote the adaptive reuse and integration of older buildings into new projects as part of the City's commitment to nurturing a sustainable Fresno.
Objective HCR-4	Foster an appreciation of Fresno's history and cultural resources.
HCR-4-d	Public Archives. Maintain public archives that include information on all designated historic properties, as well as historic surveys, preservation bulletins, and general local history reference materials. Post survey reports, Historic Preservation Commission minutes and agendas, and other information of public interest on the historic preservation page of the City's website.
HCR-4-f	Economic Incentives. Investigate the potential for developing a Mills Act program and possible sources of funding for the Historic Rehabilitation Financing Program.

Source: (City of Fresno, 2014)

4.2.4 Impact Analysis

Potential impacts on historical resources are assessed by identifying any activities (during either construction or operation) that could affect resources that have been identified as historical resources for the purposes of CEQA. Once a resource has been identified, it then must be determined whether the proposed project would "cause a substantial adverse change in the significance" of the resource, as described above. As such, in accordance with

CEQA Guidelines section 15064.5(b)(2), the following analysis considers the potential for the proposed project to materially impair the significance of a historical resource by causing direct or indirect changes to the physical characteristics of the resource that convey its historical significance. Mitigation of impacts on historical resources may involve avoiding the resource, revising the project to minimize the effect, or, where avoidance or minimization is not feasible, documenting the resource. However, as noted above, documentation may not reduce impacts on a historical resource to a less-than-significant level.

4.2.4.1 Significance Criteria

The proposed project would have a significant impact on historical resources if it would cause a *substantial adverse change* is defined by CEQA Guidelines section 15064.5 as "physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired." The significance of a historical resource is "materially impaired," according to CEQA Guidelines Section 15064.5(b)(2), when a project "demolishes or materially alters in an adverse manner those physical characteristics" of the resource that do any of the following:

A. Convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register.
B. Account for its inclusion in a local register of historical resources pursuant to section 5020.1(k) of the Public Resources Code or its identification in a historical resources survey meeting the requirements of Public Resources Code section 5024.1(g), unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant.
C. Convey its historical significance and justify its eligibility for inclusion in the California Register as determined by a lead agency for purposes of CEQA.

As noted above, a project that would comply with the Secretary's Standards is considered to have mitigated its impact to a less-than-significant level (CEQA Guidelines section 15064.5[b][3]). However, CEQA Guidelines section 15126.4(b)(2) states that "[i]n some circumstances, documentation of a historical resource, by way of historic narrative, photographs or architectural drawings, as mitigation for the effects of demolition of the resource will not mitigate the effects to a point where clearly no significant effect on the environment would occur." In such cases, the demolition or substantial alteration of a historical resource would remain a significant and unavoidable impact on the environment even after the historical documentation has been completed.

4.2.4.2 Impacts and Mitigation Measures

4.2.4.2.a. Impact HIST-A:

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

Significant and Unavoidable Impact with Mitigation Incorporated

The proposed project would demolish the MPR (Building G), Buildings E and F, and portable buildings P11, P12, and P13. The project would include an interior remodel of Building I for conversion to a library, interior remodels and fire/security alarm upgrades for Buildings A, B, C, D, H, and J (Library), and fire/security alarm upgrades for portable buildings P1 through P10.

Based on the findings of the HASR prepared for the project, District staff determined that Building J (Library), Classroom Buildings C and D, and the MPR are individually eligible for listing in the California Register of Historical

Resources under Criteria 1 and 3, due to their association with noted architects W.D. Coates and the firm Franklin and Simpson, and as intact examples of the Finger Plan and Mid-Century Modern architectural styles. Accordingly, the District considers these buildings to be historical resources for purposes of CEQA.

Demolition of Building G (MPR) would result in the permanent loss of a historical resource. Pursuant to CEQA Guidelines Section 15064.5(b)(1), this constitutes a substantial adverse change in significance and is a **significant impact.**

The District shall implement the following mitigation measures related to the MPR:

MM-HIST-1: Historic Documentation Prior to Demolition

Prior authorizing demolition activities to proceed, the District documented the MPR in accordance with the Historic American Buildings Survey and Historic American Engineering Record standards at the appropriate level, or California Historical Resources Information System architectural documentation standards, as determined in consultation with a qualified architectural historian meeting the Secretary of the Interior's Professional Qualification Standards.

Documentation shall, at a minimum, include the following components:

- Large-format digital photographs documenting all exterior elevations, significant interior spaces, character-defining features, landscape relationships, and architectural details.
- A complete written architectural description addressing form, materials, design, alterations, integrity, and period of significance.
- Scaled site plans and measured drawings are sufficient to illustrate spatial relationships, footprint, and defining architectural elements.

The completed documentation package shall be submitted to the City of Fresno Historical Preservation Committee, the Central Information Center of the California Historical Resources Information System, and the District archives prior to the start of demolition activities.

MM-HIST-2: Salvage Evaluation, Design Integration, and Historical Materials Salvage Plan

Prior to demolition of the MPR, the Design-Build Entity shall retain a qualified architectural historian to review the building and identify character-defining architectural elements that contribute to its historic significance. The review shall include an evaluation of opportunities for salvage and reuse of building materials and architectural elements, where feasible and practical, considering factors such as condition, constructability, safety, cost, and compatibility with the proposed project. Components that may be evaluated for salvage include, but are not limited to, Roman brick, decorative masonry features, signage, and other distinctive architectural details.

The findings of the review shall be provided to the District and considered during project design. To the extent feasible, the replacement building and site improvements shall incorporate design elements that reflect the character-defining features of the existing MPR, including the use of similar materials, colors, textures, brick detailing, massing, or architectural features associated with the building's mid-century modern design. Salvaged materials, if determined feasible for reuse, may be incorporated into the replacement building, site features, landscape elements, signage, or interpretive displays. A final Historical Material Salvage Plan shall be developed by the Design-Build Entity and approved by the District and implemented during demolition activities (see MM-HIST-5 and 6).

MM-HIST-3: Interpretive and Commemorative Materials

The Design-Build Entity, in coordination with the District, shall develop and implement a permanent interpretive program to commemorate the demolished historic resource of the MPR. Interpretive materials may include plaques, signage, digital exhibits, or integrated landscape features. Interpretation shall describe

the history, architecture, period of significance, and role of the demolished building within the development of the campus.
Interpretive content shall be prepared in consultation with a qualified historian or architectural historian and installed on the project site prior to project occupancy.

MM-HIST-4: Archival Recordation and Curation

The District shall ensure that all historic documentation, archival research, drawings, and photographs collected as part of the mitigation program related to the MPR are curated in both digital and hard-copy formats and provided to the City of Fresno Historical Preservation Committee. Copies shall be retained by the District for long-term access and made available to researchers upon request.

MM-HIST-5: Demolition Worker Salvage Training
Prior to the start of demolition activities, the Design-Build Entity shall require that the construction workers managing or actively participating in demolition activities of the MPR receive a briefing on the historical significance of the MPR, the character-defining features identified for salvage in the approved Historical Materials Salvage Plan, and applicable controlled demolition methods. Training documentation shall be maintained by the Design-Build Entity and verified by the District.

MM-HIST-6: Controlled Demolition Procedures
The Design-Build Entity shall implement demolition methods designed to minimize unnecessary damage to materials identified for salvage in the Historical Materials Salvage Plan. Mechanical demolition shall be limited in areas where manual removal is required to extract identified architectural features for salvage. **MM-HIST-7: Post-Demolition Reporting**
Following completion of demolition, the Design-Build Entity shall prepare a brief summary memorandum documenting implementation of mitigation measures HIST-1 through HIST-6 and submit it to the District. The memorandum shall confirm completion of documentation, salvage efforts, interpretive installation, and archival curation and shall be retained in the project file.

Implementation of Mitigation Measures HIST-1 through HIST-7would require documentation, salvage evaluation, interpretive treatment, and archival recordation. These measures would document and partially compensate for the loss but would not avoid or reduce the demolition of the resource. Therefore, the impact would remain **significant and unavoidable**.

Interior remodel activities in Buildings C and D and Building J (Library) could result in a substantial adverse change if they alter or remove character-defining features or spatial relationships that convey historical significance. Furthermore, as discussed in Section 4.11 *Noise*, high-vibratory construction activities near these buildings, such as grading and compacting, have the potential to damage these historical resources. These are **significant impacts**.

The District shall implement the following mitigation measures for work to or near Buildings C, D, and J:

MM-HIST-8: Secretary of the Interior's Standards Compliance
Throughout the plan development process and prior to authorizing construction to proceed, the Design-Build Entity shall ensure that all rehabilitation, alteration, and renovation work affecting Buildings C, D, and J is designed and implemented in a manner consistent with the *Secretary of the Interior's Standards for the Treatment of Historic Properties (36 CFR Part 68)*. This shall include the preservation of character defining features and the compatibility of new materials.

MM-HIST-9: Historic Materials Protection Plan
After the development of the final design plans, the Design-Build Entity shall retain a qualified architectural historian (meeting the Secretary of the Interior's Professional Qualification Standards) to develop a Historic

Materials Protection Plan for all work on or near Buildings C, D, and J, and submit the Plan to the District for approval. The Plan at a minimum shall:

- Identify and document character-defining features for protection;
- Identify prudent and feasible physical protection measures (coverings, paddings, barriers, signage, etc.) to be installed by the Design-Build Entity prior to construction on or near the buildings to prevent damage to character-defining features from construction activities;
- Identify construction workers whose work on or near the buildings have a moderate or high potential to damage character-defining features to be trained prior to starting construction activities;
- Specifically address potential impacts from groundborne vibrations, as identified in MM-NOISE-2;
- Identify construction activities involving character defining materials that shall be monitored by the architectural historian, as appropriate.

MM-HIST-10: Worker Environmental Awareness Training

Prior to starting their construction activities on or near Buildings C, D, and J, construction personnel whose work has been identified as having a moderate or high potential to damage character defining features in the Historic Materials Protection Plan, and all Design-Build Entity personnel managing these activities, shall receive a training prepared by the architectural historian that:

- Identifies the buildings as historical resources;
- Reviews the Historic Materials Protection Plan;
- Identifies character-defining features to be protected and methods to be implemented to protect these materials;
- Identify work that must be monitored by the architectural historian;
- Vibratory controls, as identified in MM-NOISE-2;

Outlines required procedures if previously unidentified historical elements are encountered.

MM-HIST-11: Unanticipated Discoveries

If previously unidentified historical features or materials are encountered in or near Buildings C, D, and J during construction:

- Work in the immediate area shall cease;
- The architectural historian shall evaluate the find;
- Recommendations shall be implemented to avoid or minimize impacts.

MM-HIST-12: Construction Protection Measures

During construction in or near Buildings C, D, and J, the Design-Build Entity shall implement protective measures to avoid damage to historic materials, including:

- Physical barriers or coverings over sensitive features;
- Restrictions on staging or storage within historically sensitive areas;
  Vibration control where appropriate.

MM-HIST-13: Post-Construction Reporting

Following completion of all construction and renovation activities on/near Buildings C, D, and J, the Design-Build Entity shall prepare a brief summary memorandum documenting implementation of mitigation measures HIST-8 through HIST-12 and submit it to the District. The memorandum shall confirm completion of documentation, historic preservation efforts completed, and shall be retained in the project file.

MM-NOISE-2: Restrict High Vibratory Equipment Near Buildings

The following restrictions to high vibratory equipment shall be implemented during construction

1. **Prohibit Use of Vibratory Rollers within 26 Feet of Historical Buildings**. Vibratory Rollers shall not be used within 26 feet of historical buildings to be preserved (Buildings C, D, and J). Alternative construction

equipment shall be used near these buildings. Static rollers or other low vibratory methods shall be used instead of vibratory rollers for compaction/paving activities within 26 feet of Buildings C, D, and J.

2. **Prohibit Use of Vibratory Rollers within 15 Feet of New Buildings**. Vibratory Rollers shall not be used within 15 feet of new completed buildings constructed as a part of the project. Alternative construction equipment shall be used in these areas. Static rollers or other low vibratory methods shall be used instead of vibratory rollers for compaction/paving activities within 15 feet of new completed buildings.

3. **Prohibit Use of Large Bulldozers within 15 Feet of Historical Buildings**. Large bulldozers shall not be used within 15 feet of historical buildings to be preserved (Building C, D, and J). Small bulldozers shall be used instead for grading, demolition, or miscellaneous activities within 15 feet of Buildings C, D, and J.

These mitigation measures would require that project design and construction activities conform to the *Secretary of the Interior's Standards for the Treatment of Historic Properties*, under oversight of a qualified architectural historian. These measures include identification and protection of character-defining features, review and approval of design plans, compatibility of new materials, and construction-phase protection. Also Mitigation Measures HIST-13 and NOISE-2 include measures to ensure that groundborne vibrations from construction activities do not significantly impact historical resources.

Compliance with Mitigation Measures HIST-8 through HIST-13 and NOISE-2 would ensure that project-related alterations do not materially impair the significance or integrity of the historical resources. Therefore, the project would not result in a substantial adverse change to Buildings C and D or Building J (Library), and impacts would be **less than significant with mitigation incorporated.**

Buildings A, B, E, F, H, and I were determined not eligible for listing in the California Register under any criteria, and portable buildings P1 through P13 lack historical significance. Accordingly, demolition, alteration, or upgrades to these structures would not affect historical resources and would result in a **less than significant impact**.

Significance after Mitigation:

Implementation of Mitigation Measures HIST-8 through HIST-13 would ensure that alterations to Buildings C and D and Building J (Library) are consistent with the Secretary of the Interior's Standards and would avoid a substantial adverse change in their significance. Impacts to these resources would be less than significant with mitigation incorporated.

Implementation of Mitigation Measures HIST-1 through HIST-7 would provide documentation, salvage, and interpretive treatment of the MPR, however, these measures would not reduce the physical loss of the resource. Therefore, impacts to historic architectural resources would remain **significant and unavoidable**.

4.3 Hazards & Hazardous Materials

Hazards and hazardous materials were issues identified as requiring detailed analysis to evaluate the project's potential impacts.

4.3.1 Introduction

This section discusses the hazards and hazardous materials associated with the proposed project. In particular, this section reviews the regulatory and environmental setting, and the proposed project's impacts regarding hazards and hazardous materials. The regulatory setting refers to applicable Federal, State, and local regulations whereas the environmental setting refers to the existing site conditions, including the information gathered through site assessments. Project impacts are analyzed in this section, and mitigation measures are proposed for any impacts that would be potentially significant. Impacts associated with hazards surrounding wildfire and wildfire risk are discussed in Section 4.21 *Wildfire* of this EIR.

4.3.2 Regulatory Setting

Department of Toxic Substances Control
For K-12 projects not seeking state California Department of Education (CDE) State funding, such as the proposed project, DTSC's formal school-site environmental review through a Preliminary Endangerment Assessment (PEA) is not mandated; districts may voluntarily consult with DTSC but are not required to do so. The DTSC Schools FAQ explains that DTSC's mandatory oversight ties to Education Code § 17210–17213 when state funds are used. Projects without state funds may voluntarily participate (DTSC, 2026).

Asbestos – Federal NESHAP and SJVAPCD Implementation
Demolition or renovation that could disturb asbestos-containing material (ACM) would comply with EPA's Asbestos National Emission Standards for Hazardous Air Pollutants (NESHAP) (40 CFR Part 61, Subpart M), which requires a thorough pre-demolition inspection, advance notification, and specific work practices (e.g., adequately wet, waste handling) for institutional and public buildings (including schools) (EPA, 2026).

In the San Joaquin Valley, the San Joaquin Valley Air Pollution Control District (SJVAPCD) implements NESHAP via Rule 4002 and requires District notification prior to demolition/renovation; the District provides forms and compliance bulletins for submittal and inspection documentation. Local building departments also condition demolition permits on proof of SJVAPCD notification (e.g., Fresno County requires a 10-day notice and verification before issuing a demolition permit) (San Joaquin Valley Air Pollution Control District, 2007).

Worker Protection—Cal/OSHA Asbestos and Lead Standards
Construction worker exposure during abatement and demolition would be governed by Cal/OSHA. For asbestos, 8 CCR § 1529 applies to demolition, removal/encapsulation, renovation, and related activities, requiring exposure assessment, engineering controls, medical surveillance, and competent person oversight (EPA, 2012). For lead, 8 CCR § 1532.1 applies to construction activities that disturb lead-based paint or other lead-containing materials. Cal/OSHA's 2025 update lowered exposure limits and strengthened protective measures (Department of Industrial Relations, 2025).

Imported Fill for Sensitive Uses (Schools)
If the project includes importing soil, the District will apply DTSC's Clean Imported Fill Material advisory (case-by-case screening of source areas, analyte selection, and sampling frequency) to avoid introducing

contaminated soil to sensitive land uses such as schools. Although advisory and not regulatory, it is a widely used state reference for campus work (DTSC, 2001).

Hazardous Materials Handling, Transport, and Disposal

Any hazardous wastes generated during abatement (e.g., asbestos waste, lead-containing debris) would be characterized, packaged, manifested, transported, and disposed per applicable federal/state requirements (e.g., NESHAP waste handling standards; hazardous waste statutes and regulations administered in California). The NESHAP includes asbestos waste handling standards integral to demolition/renovation compliance (EPA, 2026).

Hazardous Material and Waste Handling Regulations

California Health and Safety Code Section 25501(p) define hazardous material as: "…any material that, because of its quantity, concentration, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or the environment if released into the workplace or the environment. 'Hazardous materials' include, but are not limited to, hazardous substances, hazardous waste, and any material that a handler or the administering agency has a reasonable basis for believing that it would be injurious to the health and safety of persons or harmful to the environment if released into the workplace or the environment."

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

4.3.3 Environmental Setting

This section describes the known on-site hazards and hazardous materials at the proposed project site. This section also summarizes the reports prepared to evaluate the potential hazardous materials at the project site. A Phase I Environmental Site Assessment (ESA) (Appendix F), a Limited Phase II ESA, a Focused Phase II ESA, and a Hazardous Building Materials Survey Report were prepared for the project. These incremental investigations identified at the site the presence of Recognized Environmental Conditions (RECs) (defined as the presence or likely presence of hazardous substances or petroleum products due to a release, likely release, or material threat of a release), performed soil and soil vapor testing screening of all RECs, and follow-up focused testing for areas/substances identified above relevant DTSC screening levels.

Phase I Environmental Site Assessment

The Phase I ESA was completed for the project site and is included in Appendix F. The assessment evaluated potential RECs at the site, such as transmission line transformers, sump pumps, pre-existing conditions, underground storage tanks, above ground storage tanks, and other potential pollution sources. The assessment also included a site reconnaissance, review of historical records, environmental databases, regulatory files, and available agency information. Agency information included multiple environmental databases such as GeoTracker, EnviroStor, underground storage tank records, and hazardous materials listings. Nearby properties were also investigated for off-site RECs such as groundwater pollution or spills that could impact the project site. The Phase I ESA determined the presence of an abandoned-in-place Underground Storage Tank (UST) as an on-site Historical REC (HREC) and an off-site Vapor Encroachment Condition (VEC) (Certerra - RMA Geoscience, 2026).

The UST used to store diesel fuel in the past has been abandoned following State procedures and requirements in 2000. According to Fresno County records, soil testing did not detect hydrocarbons thus confirming that the UST did not release hydrocarbons into the surrounding soil. The report did not consider the UST to be a REC, but rather a HREC and recommends removing the UST during demolition activities near the UST.

A Vapor Encroachment Condition (VEC) refers to the presence of a volatile organic compound (VOC) contamination in the groundwater at a subject property and has been identified at the project site. Groundwater contamination has been detected at a nearby industrial facility and a nearby automotive rebuilding facility, where assessments in 1998 and 2020 determined that the contaminant plume has migrated under the project site. As in, the VOCs have infiltrated the groundwater aquifer under the project site. The Phase I ESA recommended further investigation, prompting Phase II ESAs.

Limited Phase II Environmental Site Assessment

The subsequent Limited Phase II ESA further assessed potential VEC impacts at the project site and evaluated other constituents, including lead in soil was prepared (Willbanks Enviornmental Consulting, Inc., 2026). Soil gas probes were installed to characterize VOC concentrations in subsurface soil gas, and shallow soil samples were collected to evaluate the presence of agricultural pesticides and metals. Sample results were compared against Environmental Screening Levels (ESLs) developed by the San Francisco Bay Regional Water Quality Control Board (San Francisco Bay RWQCB, 2025). ESLs are conservative, risk-based screening criteria used to identify contaminants that may warrant additional evaluation and are not regulatory cleanup standards or indicators of an immediate health hazard. Exceedance of an ESL does not necessarily indicate unacceptable risk; rather, it indicates that further investigation may be appropriate to evaluate potential exposure pathways and site-specific conditions. See Table 14 for the VOCs detected at concentrations exceeding applicable Residential Sub-Slab/Soil Gas ESLs from three sample locations.

TABLE 14: SUMMARY OF SOIL GAS ANALYTES ABOVE SCREENING LEVELS

VOC	ESL (µg/m^3)	Detected Concentrations (µg/m^3)[1]
Chloroform	4.1	33, 14
1,1-Dichloroethene (1,1-DCE)	58	150, 160
Tetrachloroethene (PCE)	15	18
[1] *Summary displays exceedance levels measured from three sample locations.*		

- Chloroform. Chloroform is commonly associated with chlorinated municipal water systems and frequently detected in residential soil settings. Furthermore, the report indicated that Chloroform concentrations were low and not considered hazardous.
- 1,1-Dichloroethene (1,1-DCE). The Limited Phase II report indicates that 1,1-DCE concentrations are low and consistent with minor chlorinated VOC impacts within the subsurface.
- Tetrachloroethene (PCE). The Limited Phase II report indicates that PCE concentrations are low, but recommends further investigation due the associated of PCE with historical industrial and commercial uses. Specifically, an indoor vapor intrusion investigation was recommended.

Pesticides were not detected in shallow soil samples, and most metals were not detected below Shallow Soil Residential ESLs. See Table 15 for the metals detected during the Limited Phase II ESA that were above their respective ESLs from 16 composite sample locations.

TABLE 15: SUMMARY OF COMPOSITE LEAD SOIL ANALYSIS ABOVE SCREENING LEVELS

Metal	ESL (mg/kg)	Detected Concentrations (mg/kg)[1]
Lead	80	140
Arsenic	0.65	1.8, 1.9, 2.1, 2.3, 3.1, 2.3, 3.5, 3
[1] Summary displays exceedance levels measured from 16 sample locations.		

- Arsenic. Arsenic was detected above applicable ESLs, however, Fresno County soils contain a relatively elevated Arsenic background level. The arsenic concentrations detected were within Fresno County background levels from geologic sources and therefore not considered a concern.
- Lead. Lead was detected at levels above the Residential Shallow Soil ESL in the parking lot planter south of Buildings C and D report recommended further investigation to delineate the extent of lead in the soil.

Overall, Limited Phase II ESA did not find widespread vapor intrusion at the project site. However, the report recommends an additional investigation to determine vapor intrusion within existing buildings. Additionally, the report recommends delineating lead at the project site to determine the scope of lead mitigation.

Supplemental Phase II Environmental Site Assessments

The Supplemental Phase II ESA investigated vapor intrusion of school buildings that would be modernized as part of the project was performed (Willbanks Environmental Consulting, Inc., 2026). The investigation installed air probes within existing buildings to determine the intrusion of VOCs measured with soil gas probes outdoors. None of the VOCs detected by the outdoor soil gas probes were detected by the indoor gas probes above their respective ESLs. Specifically, PCE was not detected in any of the indoor air samples. The report concluded that VOCs from on-site soil do not pose a threat to occupants of existing buildings and that the soil VOCs are attenuated by existing on-site conditions.

Subsequent shallow soil testing for lead determined additional locations of lead concentrations exceeding the applicable Shallow Soil Residential ESL in the southeast parking lot planter, however, the investigation determined that the lead concentrations were localized to the initial investigated area. The Focused Phase II report recommends remediating or managing the soil to prevent exposure to students, staff, or visitors (Willbanks Environmental Consulting, Inc., 2026). See Section 4.3.5 Impact Analysis for specific mitigation measures that would be implemented for the proposed project.

Hazardous Building Materials Survey Report

The Hazardous Building Materials Survey Report assessed the buildings for lead and asbestos containing materials. Multiple materials were determined to contain asbestos, such as exterior stucco and pipe insulation, and multiple surfaces were determined to contain lead, such as painted metal support poles and painted metal door frames. The report recommends that its results are included in future demolition plans (Forensic Analytical Consulting Services, 2026). See Section 4.3.5 Impact Analysis for specific measures that the proposed project would implement to address the site's lead and asbestos containing materials.

Emergency Plans and Evacuations

Fresno County adopted a multi-jurisdictional hazard mitigation plan in 2009, with the most recent version adopted in 2024 (Fresno County, 2024). This plan addresses concerns throughout Fresno County and discusses specific hazards that may affect the City of Fresno.

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

The District requires all schools to have school safety plans (Fresno Unified School District, 2025). The Norseman Elementary School campus has its own school safety plan that includes emergency planning and evacuations.

4.3.4 Impact Analysis

4.3.4.1 Thresholds of Significance

In accordance with Appendix G of the CEQA Guidelines Initial Study Checklist, a project would be considered to have a significant impact regarding Hazards & Hazardous Materials if it would:

- Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.
- 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.
- Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.
- 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.
- 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.
- Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.
- Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires.

The proposed project would be considered to have a potentially significant impact if any of the previously listed statements are true for the project. Section 4.3.4.2 Impacts and Mitigation Measures analyzes the potentially significant impacts and determines whether an impact is less than significant, less than significant with mitigation, or significant and unavoidable with mitigation incorporated. The hazards associated with wildland fires are discussed in detail within Section 4.21 Wildfire of this EIR.

4.3.4.2 Impacts and Mitigation Measures

This section reviews potential impacts regarding Hazards and Hazardous Materials and lists any applicable mitigation measure that would be implemented as part of the proposed project.

4.3.4.2.a. Impact HAZ-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

Construction
The construction of the proposed project would involve the routine transport, use, and disposal of hazardous materials. Hazardous materials typically associated with construction would asphalt (petroleum hydrocarbons), gasoline (petroleum hydrocarbons), and Portland Cement (calcium and aluminum silicates). The District would require the project contractors and employees to transport, use, and dispose of hazardous materials following labeled directions and applicable government local, regional, state, and federal regulations. Transportation-related regulations include Title 49 of Code of Federal Regulations and Title 13 of California Code of Regulations. Regulations to ensure proper inventory and storage of hazardous materials and waste include Chapter 6.95 of California Health and Safety Code.

The project would involve the removal, handling, transport and disposal of hazardous materials identified at the project site. However, this remediation work would be short-term and not routine, therefore this impact is discussed below in Impact 4.3.4.2.b. Therefore, impacts from construction would be **less than significant.**

Operation
The project would not involve the routine transport, use, or disposal of substantial quantities of hazardous materials. Hazardous materials associated with routine operation and maintenance activities would be limited to relatively small amounts of products such as paints, cleaning supplies, fuels, lubricants, and landscape maintenance materials. These materials are currently used and stored on-site as part of existing District operations and would continue to be managed in accordance with applicable federal, State, and local regulations. Therefore, operation of the project would not result in a new or substantially increased exposure of the public or the environment to hazardous materials.

In addition, the presence of volatile organic compounds (VOCs) in subsurface soil gas has the potential to affect building occupants through the vapor intrusion pathway. As discussed in Section 4.3.3, *Environmental Setting*, the project site has been investigated for potential hazardous materials concerns through preparation of a Phase I Environmental Site Assessment (ESA) (Appendix F), a Limited Phase II ESA, and a Focused Phase II ESA. These investigations identified VOC concentrations in soil gas associated with a known regional groundwater contamination plume that exceeded applicable San Francisco Bay Regional Water Quality Control Board environmental soil gas screening levels at certain sampling locations. However, concurrent indoor air sampling conducted within existing on-site buildings detected VOC concentrations below applicable health-based screening levels (Willbanks Environmental Consulting, Inc., 2026).

The indoor air sampling results indicate that vapor intrusion from site soil gas is not causing indoor air contaminant concentrations at levels of concern. Furthermore, future buildings would be constructed in accordance with current building codes and modern construction standards, which are expected to provide attenuation of soil vapors comparable to or greater than that observed in the existing buildings. Accordingly, future occupants would not be exposed to hazardous concentrations of VOCs through the vapor intrusion pathway. Therefore, operation of the project would not create a significant hazard to the public or the environment through the routine use, transport, or disposal of hazardous materials, and impacts would be **less than significant.**

4.3.4.2.b. Impact HAZ-B

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

Less than Significant with Mitigation Incorporated

Construction

The evaluations of the Phase I Environmental Site Assessment (ESA), Limited Phase II ESA, a Focused Phase II ESA, and a Hazardous Building Materials Survey Report identified three types of hazardous materials present at levels above applicable screening levels at the project site: lead contaminated soil in a parking lot planter, and lead-based (LBP) paint and asbestos containing materials (ACM) in various existing buildings. Construction, demolition, and renovation activities in areas of these materials have the potential to expose workers, students, and residential receptors to hazardous materials and spread them into the environment if done improperly. However, the handling of hazardous materials would be short-term and all would comply with applicable NESHAP, EPA, and Cal/OSHA regulations and requirements related to the handling of hazardous materials to protect human and environmental health.

Prior to any demolition or renovation activities that would disturb buildings known to have lead-based paint (LBP) or lead-coated materials, the proposed project would comply with all applicable federal and state lead hazard regulations, including the EPA Renovation, Repair, and Painting (RRP) Rule (40 CFR Part 745) and Cal/OSHA Lead in Construction Standard (8 CCR §1532.1). These regulations require identification, proper handling, containment, removal, and disposal of lead-containing materials to prevent emissions of airborne lead dust and protect worker and public health.

Prior to demolition and removal of asbestos-containing materials (ACMs), the proposed project would implement NESHAP, SJVAPCD, AHERA, and Cal/OSHA requirements. Asbestos National Emission Standards for Hazardous Air Pollutants (NESHAP) (40 CFR Part 61, Subpart M) requires a thorough pre-demolition inspection, advanced notification and specific work practices. The San Joaquin Valley Air Pollution Control District (SJVAPCD) implements NESHAP requirements via Rule 4002, requiring notification prior to demolition/renovation, inspections, and reporting. Per the Asbestos Hazard Emergency Response Act (AHERA) (40 CFR Part 763, Subpart E), workers abating ACMs must have AHERA worker training and one worker shall be trained to the AHERA Contractor-Supervisor level. Per 8 CCR § 1532.1, Cal/OSHA requires contractors removing the ACMs to implement exposure assessments, engineering controls, medical surveillance, and competent person oversight. Any hazardous wastes generated during demolition/renovation must be characterized, packaged, manifested, transported, and disposed per applicable federal/state requirements (e.g., NESHAP waste handling standards; hazardous waste statutes and regulations administered in California). The NESHAP includes asbestos waste handling standards integral to demolition/renovation compliance.

The potential of a foreseeable upset and accident conditions involving the release of hazardous materials into the environment remains a **significant impact**.

The District or it's agent shall implement the following mitigation measures to reduce the hazard to workers, students/staff, the public, and the environment from the handling, transportation, and disposal of lead-containing soil:

MM-HAZ-1: Lead-Containing Soil Abatement and Management

Lead-containing soil (LCS) has been identified within a limited area of the project site, generally within the planters south of Buildings C and D, encompassing approximately 1,500 square feet. Prior to issuance of grading permits or commencement of ground-disturbing activities, the design-build entity shall retain a qualified environmental professional, registered as a Professional Geologist (PG) or Professional Engineer (PE), to prepare a Soil Management Plan (SMP).

The SMP shall address the handling, management, transport, and disposal of impacted soil identified in the Supplemental Phase II Environmental Site Assessment (ESA) prepared for the project. The SMP shall identify measures necessary to minimize exposure risks to construction workers, students, staff, the public, and off-site receptors during construction and shall establish procedures to prevent the off-site migration of contaminated soil. At a minimum, the SMP shall include the following:

For areas that will remain unpaved:

- Procedures for the excavation to two feet depth below ground surface level, characterization, transportation, and disposal of LCS at an appropriately permitted facility.
- Procedures for confirmation sampling, if warranted, and the import and placement of clean fill material following removal of LCS.

For areas that will be paved as part of the project:

- Procedures for the excavation and disposal of any LCS that must be removed to accommodate paving or related construction activities.
- Engineering and/or administrative controls to ensure encapsulated LCS remains protected beneath paved surfaces.
- Documentation requirements and procedures for future maintenance, utility work, or other subsurface disturbances in areas where LCS remains in place beneath pavement.

General requirements applicable to all affected areas:

- Stockpile management procedures, including implementation of Best Management Practices (BMPs) and stormwater pollution prevention measures to control runoff, erosion, sediment transport, and dust emissions.
- Soil monitoring, documentation, and reporting requirements.
- A site-specific Health and Safety Plan (HASP) that identifies potential hazards associated with construction activities and establishes worker protection requirements in accordance with applicable regulations.
- Soil handling, dust control, and exposure mitigation procedures to minimize the potential for exposure of construction workers, students, staff, and the public to hazardous materials during construction.

The design-build entity shall implement the approved SMP throughout all ground-disturbing activities conducted within or adjacent to the area containing LCS. Verification of SMP implementation shall be provided to the District prior to project closeout.

Implementation of Mitigation Measure HAZ-1 would reduce the impact to **less than significant with mitigation incorporated.**

Operation

As stated in Impact 4.3.4.2.a, materials associated with operations and maintenance would include paint, household hazardous wastes, and fuel for District vehicles and landscape equipment. These materials are already

in use at the project site and would not be a new exposure to the public or the environment. Therefore, the proposed project's operational impacts would be **less than significant**.

Significance after Mitigation Measures
Implementation of Mitigation measure HAZ-1 would reduce the impact to **less than significant with mitigation incorporated.**

4.3.4.2.c. Impact HAZ-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

Construction

The project site is located at the existing Calwa Elementary School campus. During construction, the project would involve temporary transport, storage, and use of limited quantities of hazardous materials, such as fuels, asphalt concrete, solvents, and paints which would result in a small amount of hazardous emissions. As analyzed in Section 4.1 Air Quality, these emissions would not exceed applicable SJVAPCD thresholds and would therefore the impact from construction would be a **less than significant.**

Operation

During normal operation, the District currently maintains the campus using certain hazardous materials such as, pesticides, fertilizers, paint, cleaning fluids, and solvents. The District would continue to use these materials and comply with State and Local regulations to ensure that hazardous materials are properly used, stored, and transported. The proposed project's impact from operation would be **less than significant.**

4.3.4.2.d. Impact HAZ-D

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

No Impact

The proposed project site is an existing school site and is not listed per Government Code Section 65962.5 (Cortese List) (CalEPA, 2026). Therefore, the proposed project would have **no impact**.

4.3.4.2.e. Impact HAZ-E

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

No Impact

The proposed project site is not located within any adopted airport land use plan. The proposed project would have **no impact**.

4.3.4.2.f. Impact HAZ-F

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

Less than Significant Impact

Construction may temporarily alter evacuation routes for the Calwa Elementary School. However, school administrators would alter the school's safety plan to account for temporary construction conditions. Additionally, the safety plan would be updated to consider the reconstructed school site and its updated layout.

The proposed project may temporarily interfere with traffic on surrounding roads during construction—specifically during construction of driveways and utilities. However, the proposed project would comply with City of Fresno encroachment permit and traffic control requirements and maintain fire lane access through construction to minimize the impact to traffic and therefore minimize impact to evacuation routes. The proposed project's impact would be **less than significant impact**.

4.3.4.2.g. Impact HAZ-G

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

No Impact

As discussed in Section 4.21 Wildfire, the project site is not located within a State Responsibility Area or within an area identified as being in a Fire Hazard Severity Zone. The project would have **no impact**.

Sub-Chapter 4B Topics Requiring a Moderate Level of Analysis

4.4 Aesthetics

4.4.1 Introduction

This section describes the existing environmental and regulatory setting of the project and analyzes the potential impacts of the project on aesthetics and visual resources. This section also describes the criteria used to determine the significance of impacts, the approach to assessing impacts, and possible mitigation measures.

4.4.2 Environmental Setting

The campus setting is flat with no direct views to any natural areas, except for the Sierra Nevada Mountains to the east, and to a lesser extent the Coast Ranges Mountains to the west, which are visible on days with clean air quality and open skies. Land uses within approximately a 0.5-mile radius are predominately residential to the north, east, west, and southwest, with industrial uses located to the southeast.

4.4.3 Regulatory Setting

This section briefly describes federal, State, and local regulations, permits, and policies pertaining to aesthetics and visual resources, as they apply or may be relevant to the project.

4.4.3.1 Federal Laws, Regulations, and Policies

No federal laws, regulations, or policies related to aesthetics/visual resources apply to the project.

4.4.3.2 State Laws, Regulations, and Policies

4.4.3.2.a. California Scenic Highway System

Caltrans administers the California Scenic Highway Program. The goal of the program is to preserve and protect scenic highway corridors from changes that would affect the aesthetic value of the land adjacent to highways. According to Caltrans the nearest eligible or officially designated scenic highway is State Route 168 starting at the Shaw Avenue intersection extending northeast, which is 6.7 miles north (California Department of Transportation, 2025). The Fresno County General Plan Review (County of Fresno, 2024) and the Fresno County General Plan Background Report (County of Fresno, 2000) did not identify or designate any scenic vistas within or near the project.

Caltrans administers the California Scenic Highway Program. The goal of the program is to preserve and protect scenic highway corridors from changes that would affect the aesthetic value of the land adjacent to highways.

4.4.3.3 Local Laws, Regulations, and Policies

4.4.3.3.a. City of Fresno General Plan

The City of Fresno General Plan includes objectives and policies related to aesthetics. Relevant policies from the General Plan include:

> **Policy LU-8-d: Public Facilities and Institutions Meeting City Standards.** Request that federal, State, and local agencies locating public facilities and institutions in the City or designated growth area, meet City standards for public streets and sidewalks, access, parking, water supply, wastewater disposal, landscaping, and amenities.
>
> **Policy LU-D-1-e: Graphic Identity.** Continue the preservation, promotion, procurement and strategic location of landmarks, monuments and artwork that provide orientation and represent Fresno's cultural heritage and artistic values.
>
> **Policy D-1-j: Lighting Standards.** Update lighting standards to reflect best practices and protect adjoining uses from glare and spillover light (City of Fresno, 2014).

4.4.3.3.b. City of Fresno Municipal Code

The City of Fresno Municipal Code, Section 15-2508 Lighting and Glare requires light trespass to be limited to 1.0 foot-candle onto public streets and limited to 0.5 foot-candle onto residentially zoned property or property containing residential uses (City of Fresno, 2025). A foot-candle is a unit of measurement used to measure the intensity of light.

4.4.4 Impact Analysis

4.4.4.1 Thresholds of Significance

The thresholds for determining the significance of impacts for this analysis of aesthetics and visual resources are based on the environmental checklist in the State CEQA Guidelines, as amended. The State CEQA Guidelines define a "significant effect" on the environment to mean a "substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project, including … objects of historic or aesthetic significance" (14 CCR Section 15382). The project would have a significant impact on aesthetics and visual resources if it would:

- have a substantial adverse effect on a scenic vista;
- substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway;
- substantially degrade the existing visual character or quality of the site and its surroundings; or
- create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

4.4.4.2 Methodology

The analysis of the project's potential impacts was based on an evaluation of the changes to the existing aesthetic/visual resources that would result from implementing the project. In determining the extent and implications of the aesthetic/visual changes, consideration was given to:

- specific changes in the affected aesthetic/visual environment's composition, character, and any specially valued qualities;

- the affected aesthetic/visual environment's context; and
- the extent to which the affected environment contains places or features that have been designed in plans and policies for protection or special consideration.

4.4.4.3 Impacts and Mitigation Measures

4.4.4.3.a. Impact AES-A:

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

Less than Significant Impact

The project site is not located within the viewshed of a designated scenic vista and is not adjacent to, or visible from, an eligible or officially designated state scenic highway. The proposed project would involve construction of new single-story buildings on the existing campus. Due to the limited height and scale of the proposed buildings, the project would not substantially obstruct views of the Sierra Nevada Mountains. In addition, views of the mountains from residential areas east and west of the campus are already substantially limited by existing mature vegetation, the distance to the mountain range, and periodic air quality conditions that reduce visibility. Accordingly, the proposed project would not substantially degrade or obstruct a scenic vista. Therefore, impacts related to scenic vistas would be **less than significant**.

4.4.4.3.b. Impact AES-B:

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

Less than Significant Impact with Mitigation Incorporated

The project would alter the visual character of the campus through demolition of the existing MPR, Buildings E and F, and Portable Buildings P11, P12, and P13, and construction of a new Administration Building, MPR, and Early Learning buildings. In addition, new parking areas in the northwestern and southeastern portions of the campus would alter the existing character of the campus. These improvements would replace portions of the campus developed with finger-plan and mid-century modern architectural styles with contemporary educational facilities. However, the finger-plan architectural character would continue to be represented on the campus through the preservation of Classroom Buildings A and B and the historically significant Classroom Buildings C, D, and J, as well as the existing mural on Building J which would be retained. Preservation of the historical character of Buildings C, D, and J during renovation activities would be ensured through implementation of Mitigation Measures HIST-8 through HIST-14. In addition, the 1960s-1970s cluster-plan architectural character represented by Buildings H and I would remain on the campus.

As discussed in Section 4.2, *Historic Architectural Resources*, the existing MPR is eligible for listing in the California Register of Historical Resources (CRHR), and its demolition would constitute a significant and unavoidable impact to historical resources. The MPR also contributes to the visual identity of the campus through its red brick exterior and mid-century modern architectural design. However, the building's status as a historical resource does not necessarily indicate that its removal would substantially damage a scenic resource. While the building possesses historic significance, its visual character has been diminished by the addition of exterior mechanical, electrical, and utility equipment that detracts from its original architectural appearance.

Implementation of Mitigation Measure HIST-2 would require evaluation of opportunities to incorporate character-defining features of the existing MPR into the replacement building, including, where feasible, the use of similar

materials, brick detailing, colors, textures, and architectural elements reflective of the original mid-century modern design. The replacement MPR would be constructed in a similar location and would be designed to serve as a visually prominent campus feature. Through incorporation of these design elements and contemporary architectural features, the replacement structure would maintain important aspects of the campus's visual identity and would provide a visually cohesive educational facility. Accordingly, although demolition of the existing MPR would result in a significant impact to historical resources, the project would not substantially modify scenic resources, and impacts would be **less than significant with mitigation incorporated.**

4.4.4.3.c. Impact AES-C:

Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

Less than Significant Impact with Mitigation Incorporated

Land uses within approximately a 0.5-mile radius are predominately residential to the north, east, west, and southwest, with industrial uses located to the southeast. At a broader scale of 2.5-mile, the surrounding land use pattern transitions to more extensive industrial development to the south, southwest, and southeast. As discussed in Impact 4.4.4.3.b, Mitigation Measure HIST-2 would require the proposed MPR be designed and constructed to replicate the character of the existing MPR and Mitigation Measures HIST-8 through HIST-14 would ensure that ensure that Classroom Buildings C and D have their historical character preserved.

For the remainder of the redeveloped campus, the District and its agents would develop an architectural aesthetic that will complement the surrounding area. Therefore, through the implementation of Mitigation Measures HIST-2 and HIST-8 through HIST-14, the visual elements of the project would not substantially degrade the existing visual character or quality of public views of the site and its surroundings. The impact would be **less than significant with mitigation incorporated.**

4.4.4.3.d. Impact AES-D:

Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Less than Significant Impact

The project would reconstruct the campus and introduce new sources of nighttime illumination and potential glare. New lighting elements would include building and security lighting, parking lot lighting, and potential replacement or supplemental street lighting within the City of Fresno public right-of-way. Building-mounted security lighting and parking lot lighting would incorporate modern, fully shielded fixtures designed to direct illumination downward and limit light spill beyond the intended areas. Street lighting improvements would conform to applicable City of Fresno design standards and illumination requirements.

Potential glare sources associated with the project include building windows and reflective architectural materials. The proposed project would utilize standard anti-glare window treatments and non-reflective or low-reflectivity building materials to minimize glare and prevent excessive light reflection toward adjacent roadways or surrounding uses.

With implementation of these design features and compliance with applicable City standards, project-related lighting and glare would not substantially affect nighttime views or create hazardous or distracting conditions for motorists or nearby receptors. Therefore, impacts related to light and glare would be **less than significant.**

4.5 Biological Resources

4.5.1 Introduction

This section analyzes the project's impact on biological resources. It outlines the regulatory framework for and describes the existing environmental setting related to the project location; identifies potential biological resources at the project site; evaluates potential direct and indirect impacts of the proposed project; and identifies mitigation measures to reduce the potential adverse impacts.

4.5.2 Environmental Setting

The project site is an existing, fully developed elementary school. The school's landscape includes man-made landscape planters, grass turf playfield, and various trees that include non-native species and native species such as oak trees. Surrounding areas are completely urbanized and include residential land uses, commercial land uses, and industrial land uses. The nearest open space is a vacant field surrounded by urban land uses approximately 0.5 miles to the west. The nearest rural open space is approximately 0.66 miles to the northwest, though this property is also surrounded by urban land uses. Overall, the project site and nearby properties are in a highly urbanized location (see Figure 2 – Vicinity Map).

As the project is a fully developed school site, the site does not contain any wetlands, riparian areas, sensitive natural communities, nursery sites, or migratory corridors.

4.5.3 Regulatory Setting

4.5.3.1 Federal Laws, Regulations, and Policies

4.5.3.1.a. Endangered Species Act

The Endangered Species Act of 1973 protects fish, wildlife, and plants that have been determined to be "Threatened" or "Endangered". The law provides a process for determining whether a species should be "listed" as Threatened or Endangered, a process to delist a species, a process to determine critical habitat for protected species, requirements for Federal agencies to assess and mitigate impacts to protected species, and other regulations in order to protect threatened or endangered species (USFWS, 2026). The Federal Endangered Species Act (FESA) differs from the State of California's Endangered Species Act, and the Federal government maintains its own list of protected species separate from the State's list of protected species.

4.5.3.1.b. Migratory Bird Treaty Act

The Migratory Bird Treaty Act of 1918 (United States Code Title 16, §703-711) is the federal statute that enacts the terms of treaties between the United States and Canada, Mexico, Japan, and Russia intended to sustain populations of migratory birds (USFWS, 2026). The Migratory Bird Treaty Act (MBTA) prohibits the "take" of protected migratory bird species without prior authorization from the Department of the Interior (specifically, the U.S. Fish and Wildlife Service). Take includes killing, capturing, selling, trading, and transporting these species. A list of protected species is available in the Code of Federal Regulations Title 50 Part 10.13. Typically, protected species include any species that occurs naturally in the United States. Many non-native species are not included in this list.

4.5.3.2 State Laws, Regulations, and Policies

4.5.3.2.a. California Endangered Species Act

The California Endangered Species Act of 1970 (CESA) is an environmental law that protects plant and animal species at risk of extinction (CDFW, 2026). The law provides for a process to list species as Threatened or Endangered, similar to the Federal Endangered Species Act. The law prohibits the "take" of a protected species without prior authorization from the California Department of Fish and Wildlife. The State of California maintains a list of protected species separate from the Federal government, though some listed species may overlap between the FESA and the CESA.

4.5.3.3 Local Laws, Regulations, and Policies

4.5.3.3.a. County of Fresno

The County of Fresno does not have any designated protected natural areas (e.g., designated open space, habitat conservation plans, or other conservation plans) located at or near the project site.

4.5.3.3.b. City of Fresno

The City of Fresno does not have any designated protected natural areas (e.g., designated open space, habitat conservation plans, or other conservation plans) located at or near the project site.

The City of Fresno's municipal code contains provisions for Tree Preservation (City of Fresno, 2026). Specifically, Chapter 13, Article 3, Section 13-305 Tree Preservation explains requirements for the preservation of trees on public property or property controlled by the City of Fresno. Public property in this ordinance is defined as property owned by the City of Fresno.

4.5.4 Impact Analysis

4.5.4.1 Thresholds of Significance

California Public Resources Code Section 21001 establishes State policy to protect biological resources and maintain viable plant and wildlife communities. Consistent with Section 15065(a) of the CEQA Guidelines, a project may result in a significant impact if it adversely affects species, habitats, or ecosystems.

The project would have a significant impact on biological resources if it would:

- Substantially affect, directly or through habitat modification, any special-status species identified by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service, or in applicable plans or regulations;
- Substantially affect riparian habitat or other sensitive natural communities;
- Substantially affect federally protected wetlands regulated under Section 404 of the Clean Water Act;
- Interfere with wildlife movement, corridors, or nursery sites;
- Conflict with local policies or ordinances protecting biological resources; or

4.5.4.2 Methodology – Literature Review and Database Analysis

The following sources were reviewed to obtain information on sensitive biological resources occurring in the Project vicinity:

- USFWS Critical Habitat Mapper,
- USFWS National Wetlands Inventory,
- Federal Emergency Management Agency (FEMA) Flood Zone Maps, and

A review of the National Wetlands Inventory was completed to identify whether wetlands had previously been documented on or adjacent to the project site. Information about flood zones was obtained from the Federal Emergency Management Agency, flood zone maps. The USFWS Critical Habitat Mapper was used to determine the presence or proximity of critical habitat to the project site.

4.5.4.3 Impacts and Mitigation Measures

4.5.4.3.a. Impact BIO-A:

Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U. S. Fish and Wildlife Service?

Less than Significant with Mitigation Measures
Land uses within approximately a 0.5-mile radius are predominately residential to the north, east, west, and southwest, with industrial uses located to the southeast. At a broader scale of 2.5-mile, the surrounding land use pattern transitions to more extensive industrial development to the south, southwest, and southeast. There is no habitat for candidate, sensitive, or special status species.

However, multiple landscape trees are located at the project site that may provide habitat for nesting birds which are protected by the Migratory Bird Treaty Act (MBTA). Buildings proposed for demolition could also provide nesting habitat for birds. Trees and buildings that would be removed during construction may potentially significantly impact nesting birds if removal/demolition occurs during the nesting bird season. Common protected species that could be affected include House Finch (*Haemorhous mexicanus*), Mourning Dove (*Zenaida macroura*), Northern Mockingbird (*Mimus polyglottos*), Scrub Jay (*Aphelocoma californica*), and American Crow (*Corvus brachyrhynchos*). In addition, species such as the Cliff Swallow (*Petrochelidon pyrrhonota*) may nest on existing buildings. The impact is **significant.**

Therefore, the District or its agent shall implement the following mitigation measure.

> **MM-BIO-1: Nesting Bird Avoidance and Minimization.** The nesting bird season is between February 1st and August 31st. Trees are expected to be removed at the project site and should be removed before construction begins to prevent birds from nesting in those trees during construction, and those trees should be removed outside of the nesting bird season. As in, trees should be removed between September 1st and January 31st. Structures proposed for demolition could also be used as nesting habitat. Buildings should also be demolished outside of nesting bird season:
>
> If trees or structures must be removed during the nesting bird season, then a qualified biologist shall perform a pre-construction nesting bird survey to determine whether birds are currently nesting in trees or structures at the project site.

- If there are no active nests in the trees/structures at the project site, then the trees/structures can be removed during the nesting bird season, but no later than 30 days after the nesting bird survey. Another survey shall be conducted once 30 days have passed from the initial survey.
- If an active nest is observed in the trees/structures at the project site, then those trees/structures shall not be removed until a qualified biologist has determined that the nest is no longer being used or that the fledglings are no longer dependent on the nest.
    - If a biologist is not available for continuous monitoring, then a 250' buffer should be established around the active nest(s) where construction activity is not allowed, aside from vehicle access.
    - Though unlikely, a 500' buffer should be established for any raptor species nests.
    - If a buffer is not feasible, then a qualified biologist shall monitor the nest in the meantime and stop nearby construction activity if they determine that nesting behavior is being negatively affected by that activity.
    - A hybrid approach may be used where a buffer is set around an active bird nest until construction is required near the nest. At this point, a qualified biologist may start to monitor the bird nest.
- No bird nests shall be removed during the nesting bird season when the nest is active. If a qualified biologist makes the determination that birds are no longer reliant on the nest, then the nest may be removed.

With the implementation of MM BIO-1, the impact to nesting birds would be **less than significant with mitigation incorporated.**

4.5.4.3.b. Impact BIO-B:

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

No Impact

According to CNDDB, the project site does not contain any riparian habitat or sensitive natural communities (CDFW, 2025). Additionally, the site is a fully developed elementary school campus. There would be **no impact.**

4.5.4.3.c. Impact BIO-C:

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

No Impact

A review of the U.S. Fish and Wildlife Wetland Mapper, CNDDB and FEMA Flood Zone maps shows that there are no wetlands within the project's boundaries (USFWS, 2025), (CDFW, 2025), (Federal Emergency Management Agency, 2025). Additionally, the site is a fully developed elementary school campus. The project would not involve the removal, filling, or interruption of state or federally protected wetlands. Therefore, there would be **no impact.**

4.5.4.3.d. Impact BIO-D:

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

No Impact

The project site is not in an established native resident migratory wildlife corridor (CDFW, 2025). The project would not interfere with the movement of resident or migratory fish or wildlife species, nor impede the use of native wildlife nursery sites. There would be **no impact.**

4.5.4.3.e. Impact BIO-E:

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

Less than Significant

The City of Fresno's ordinance requires projects to replace trees, if feasible, whenever they are removed during construction on City-controlled, public property (City of Fresno, 2025). The public right-of-way affected by the project does not contain trees, so the City's ordinance does not apply to the project. The project would remove existing trees at the campus where trees conflict with the proposed project. In line with the intent of the City's tree replacement ordinance, trees would be replanted in new landscaped areas around the project site, and existing trees would be preserved in place where feasible. Therefore, the project would have a **less than significant impact.**

4.5.4.3.f. Impact BIO-F:

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

No Impact

The project site is not located within any Habitat Conservation Plan or any Natural Community Conservation Plan boundaries (USFWS, 2025) (CDFW, 2023). There would be **no impact**.

4.6 Archeological Resources

This section describes the existing environmental and regulatory setting of the project and analyzes the potential impacts of the project on archeological resources. This section also describes the criteria used to determine the significance of impacts, the approach to assessing impacts, and possible mitigation measures.

4.6.1 Introduction

This section assesses the project's impact on archeological resources. Tribal cultural resources may also be considered an archeological resource, and tribal cultural resources are discussed in a more focused manner in Section 3.4.10 *Tribal Cultural Resources*. This section outlines the regulatory framework for and describes the existing environmental setting related to the project location; identifies potential archeological resources at the project site; evaluates potential direct and indirect impacts of the proposed project on archeological resources; and identifies mitigation measures to reduce the potential adverse impacts.

The information and analysis in this section are based on the *Archeological Resources Survey Report for the Calwa Elementary School Reconstruction Project*, Johnston, 2026 (see Appendix D), a Sacred Land Files Search, and complete Assembly Bill (AB) 52 tribal noticing letters (see Appendix E).

4.6.1.1 Definitions

CEQA treats archaeological resources in two related ways. First, an archaeological site may qualify as a historical resource if it meets the criteria in CEQA Guidelines Section 15064.5(a). For example, if it is listed in or eligible for the California Register, identified as significant in a qualifying survey, or determined significant by the lead agency based on substantial evidence; in such cases, impacts are evaluated as impacts to historical resources. Second, even where an archaeological site does not qualify as a historical resource, it may be a unique archaeological resource under Public Resources Code Section 21083.2, which requires the lead agency to determine the potential for significant effects and, if damage would occur, to prioritize preservation in place or require data-recovery and other mitigation. In short, archaeological sites are evaluated either as historical resources under Section 15064.5 or as unique archaeological resources under Section 21083.2, depending on their eligibility and information potential.

4.6.2 Environmental Setting

The environmental setting for archaeological resources is based on the Archaeological Resources Assessment prepared for the project, which includes a review of records, regional context discussion, sensitivity evaluation, and supporting references. The summary below is provided for informational purposes, and the Archaeological Resources Assessment prepared by Johnston and Associates in Appendix D serves as the primary source document.

The project site is in the unincorporated community of Calwa, approximately 2.5 miles south of downtown Fresno, within the eastern portion of California's San Joaquin Valley. The region occupies a gently west-sloping alluvial plain formed by sediments derived primarily from the Sierra Nevada and Coast Range mountain systems. Before historic development, the area consisted of low-lying grasslands subject to periodic flooding, situated at an average elevation of approximately 290 feet above sea level and characterized by a Mediterranean climate with semiarid conditions.

Geologically, the project site is underlain by late Holocene alluvial fan deposits associated with relatively young fan landforms. Soils mapped at the site reflect fan and terrace formations derived from granitic and mixed sediment sources and are typical of former floodplain environments. These geologic and soil characteristics are relevant to archaeological sensitivity because deeply buried cultural materials can occasionally be preserved in alluvial settings, particularly where proximity to permanent water sources existed.

Regional prehistoric occupation of the San Joaquin Valley extends back more than 11,000 years, with cultural patterns evolving from early hunting traditions to increasingly complex, regionally specialized subsistence strategies focused on gathering, fishing, and trade. The ethnographic landscape of the region was historically occupied by Yokuts peoples, with the project area lying within the broader homeland of the Gashowu band of the Northern Valley Yokuts. Yokuts settlement patterns were closely tied to major rivers, sloughs, marshes, and seasonally reliable water sources, with most permanent villages located adjacent to large waterways and elevated above flood-prone areas.

Although the broader region contains a long and well-documented prehistoric and ethnohistoric record, the project area itself is located at a considerable distance from major perennial waterways and has been subject to extensive historic-period disturbance. Beginning in the late 19th century, the area was converted from native grassland to agriculture, followed by development of school facilities in the early 20th century. More than a century of plowing, grading, and construction activity has substantially altered near-surface soil across the site.

Based on regional archaeological sensitivity modeling that incorporates landform, soil type, slope, and proximity to water, the project area is identified as having low to moderately low potential for intact buried prehistoric archaeological resources. While the likelihood of encountering intact archaeological deposits is reduced due to long-term disturbance and distance from permanent water sources, the possibility of encountering unknown subsurface resources during ground-disturbing activities cannot be entirely discounted given the age and regional context of human occupation in the San Joaquin Valley.

4.6.3 Regulatory Setting

4.6.3.1 Federal Laws, Regulations, and Policies

4.6.3.1.a. National Historic Preservation Act

The National Historic Preservation Act of 1966 (NHPA), as amended (54 U.S.C. Section 300101 et seq.), establishes a national policy for the identification, evaluation, and protection of historic and archaeological resources. Section 106 of the NHPA requires federal agencies to consider the effects of federal undertakings on historic properties that are listed in or eligible for listing in the National Register of Historic Places and to consult with appropriate stakeholders when adverse effects may occur.

The NHPA and its implementing regulations apply only to projects that involve a federal undertaking, such as the use of federal funding, issuance of federal permits, or actions occurring on federal land. The proposed project does not involve federal funding, federal permits, or other federal approvals and therefore does not constitute a federal undertaking. As a result, compliance with the NHPA and Section 106 review requirements does not apply to the project.

Although the NHPA is not applicable, its standards and concepts provide a recognized professional framework for the identification and evaluation of archaeological and historic resources. In particular, the National Register eligibility criteria established under the NHPA are commonly used under CEQA to assess the significance of archaeological resources and historical resources. As such, the principles of the NHPA are referenced for informational purposes and professional guidance in evaluating archeological resources, even where formal compliance is not required.

4.6.3.2 State Laws, Regulations, and Policies

4.6.3.2.a. California Environmental Quality Act

The California Environmental Quality Act (CEQA) (Public Resources Code Section 21000 et seq.) is the primary state law governing the identification and protection of archaeological and cultural resources in California. CEQA requires lead agencies to identify and evaluate historical and archaeological resources and to avoid or mitigate significant adverse impacts resulting from discretionary projects.

Under CEQA, archaeological resources are considered a subset of historical resources when they meet the criteria for listing in the California Register of Historical Resources (CRHR) or are otherwise determined to be significant. CEQA Guidelines Section 15064.5 establishes procedures for determining the significance of archaeological resources and evaluating project impacts. A project that causes a substantial adverse change to an archaeological resource is considered to have a significant impact.

CEQA also requires that when an archaeological resource is discovered during construction, work in the area of the discovery be halted until the resource is evaluated and appropriate treatment measures are implemented.

4.6.3.2.b. California Register of Historical Resources

The California Register of Historical Resources (Public Resources Code Section 5024.1) is an authoritative listing of buildings, sites, structures, objects, and districts significant in California history, architecture, archaeology, and culture. Archaeological resources may qualify for listing in the CRHR if they meet one or more of the register criteria and retain sufficient integrity.

Resources listed in or eligible for listing in the CRHR are presumed to be historically significant under CEQA. Archaeological resources determined to be CRHR-eligible are treated as historical resources and afforded protection under CEQA Guidelines Section 15064.5.

California Public Resources Code Sections 5097.5 Public Resources Code Section 5097.5 prohibits unauthorized disturbance, excavation, or removal of archaeological, paleontological, or historical features located on public lands or within designated archaeological sites. This section provides protection for archaeological resources regardless of whether they are formally listed.

4.6.4 Impact Analysis

4.6.4.1 Significance Criteria

Section 15064.5 of the CEQA Guidelines requires lead agencies to evaluate whether a project may affect historical or archaeological resources. A resource is considered historically significant if it is listed in, or eligible for listing in, the California Register of Historical Resources (CRHR), consistent with Public Resources Code Section 5024.1. If a

project would substantially affect a significant resource, the impact is considered significant under CEQA and must be addressed. Resources that do not meet these criteria are not considered further.

Under Public Resources Code Section 21084.1, a resource may still be determined historically significant even if it is not formally listed in the CRHR or a local register. A resource may qualify for the CRHR if it:

- Is associated with important historical events or patterns;
- Is associated with important persons;
- Embodies distinctive characteristics of a type, period, region, or method of construction, or represents the work of a notable individual; or
- Has yielded, or may yield, important information about prehistory or history.
- Based on the CEQA Guidelines, the project would result in a significant impact on cultural resources if it would:
    - Cause a substantial adverse change to a historical resource;
    - Cause a substantial adverse change to an archaeological resource;
    - Destroy or damage a unique paleontological resource or geologic feature; or
    - Disturb human remains, including those outside formal cemeteries.

CEQA does not define significance criteria for paleontological resources. Therefore, standard professional guidelines are used to classify areas as having high, low, or unknown sensitivity. Areas with non-sedimentary rock or no known fossil record are typically considered low sensitivity.

4.6.4.2 Methodology

An Archeological Survey Report (ASR) was completed for the project location to identify the potential for archeological resources at the project site, included in Appendix D and is used as the primary investigation for the potential presence of archeological resources. Related tribal cultural resources were investigated through a Sacred Land Files Search and complete Assembly Bill (AB) 52 tribal noticing letters (see Appendix E).

4.6.4.3 Impacts and Mitigation Measures

4.6.4.3.a. Impact ARC-A:

Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to State CEQA Guidelines § 15064.5?

Less than Significant Impact with Mitigation Incorporated

No known archaeological resources have been identified within the project site based on records searches and existing information. The site has been subject to extensive historic-period disturbance associated with agricultural use and development of an elementary school beginning in the early 20th century. In addition, the project area is located at a distance from major permanent water sources that historically supported concentrated prehistoric settlement. These factors indicate a low to moderately low potential for intact archaeological resources at or near the ground surface.

However, the project would involve demolition, grading, and other ground-disturbing activities that could expose previously unknown subsurface archaeological resources. Although the likelihood of encountering intact resources is reduced by long-term disturbance, the possibility cannot be entirely discounted given the long regional history of human occupation in the San Joaquin Valley and the presence of alluvial soils that can bury cultural materials. As a

result, construction activities could result in a substantial adverse change in the significance of an archaeological resource if an unknown resource were discovered and inadvertently damaged or destroyed. This is a **significant impact**.

Therefore, Mitigation Measure ARC-1 would be incorporated into the project to protect archeological resources discovered during construction activities.

> **Mitigation Measure ARC-1: Inadvertent Discovery of Archaeological Resources**
> If previously unknown archaeological resources are encountered during ground-disturbing activities, all work shall cease within 50 feet of the discovery. The Design-Build Entity shall immediately notify the District, which shall retain a qualified archaeologist meeting the Secretary of the Interior's Professional Qualification Standards to evaluate the significance of the find.
>
> The archaeologist shall assess the resource and recommend appropriate treatment measures consistent with CEQA Guidelines Section 15064.5. Construction activities shall not resume within the affected area until the archaeologist has determined that the resource has been appropriately recorded, evaluated, and either preserved in place or mitigated through data recovery or other approved measures. Implementation of the archaeologist's recommendations shall reduce impacts to archaeological resources to a less-than-significant level.

Through the implementation of Mitigation Measure ARC-1, the impact to archeological resources would be **less than significant with mitigation incorporated.**

4.6.4.3.b. Impact ARC-B:

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

Less than Significant Impact with Mitigation Incorporated
No known human remains or formal cemeteries have been identified within the project site. The site has been used for agricultural purposes since the late 19th century and has been developed as an elementary school campus since the early 20th century. These historic land uses have resulted in substantial disturbance to near-surface soils across the project area, reducing the overall likelihood that human remains are present within the upper soil strata.

However, the project would involve demolition, grading, trenching, and other ground-disturbing activities that could extend into previously undisturbed subsurface soils. Given the long history of Native American occupation within the San Joaquin Valley and the possibility of unrecorded or isolated burials occurring outside of formal cemetery contexts, the inadvertent discovery of human remains during construction cannot be entirely ruled out. If such remains were encountered and disturbed without appropriate procedures, this is a **significant impact** under CEQA. Therefore, Mitigation Measure 4.6-3 would be incorporated into the project to protect any discovered human remains.

> **Mitigation Measure ARC-2: Inadvertent Discovery of Human Remains**
> In the event that human remains are discovered during ground-disturbing activities, all work shall cease immediately within 100 feet of the discovery. The Design-Build Entity shall notify the District, which shall contact the County Coroner pursuant to California Public Resources Code Section 5097.98.

If the Coroner determines that the remains are Native American, the Coroner shall notify the Native American Heritage Commission, which shall designate a Most Likely Descendant. The District shall coordinate with the Most Likely Descendant to determine appropriate treatment and disposition of the remains in accordance with state law. No further disturbance of the area shall occur until all required notifications, consultations, and treatment measures have been completed.

With the implementation of Mitigation Measures ARC-2, the impact to human remains would be **less than significant with mitigation incorporated.**

4.7 Energy and Energy Resources

4.7.1 Introduction

This section describes the existing environmental and regulatory setting of the project and analyzes the potential impacts of the project on aesthetics and visual resources. This section also describes the criteria used to determine the significance of impacts, the approach to assessing impacts, and possible mitigation measures.

4.7.2 Environmental Setting

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

The consumption of non-renewable energy is directly related to air quality and greenhouse gas (GHG) emissions. The demand for fossil fuels from transportation, building operations, and energy generation contributes to the emission of criteria air pollutants and greenhouse gases. These environmental impacts are discussed in detail in Section 3.1.1 *Air Quality*, and Section 3.4.6 *Greenhouse Gas Emissions,* and the *Air Quality & Greenhouse Gas Impact Analysis* in Appendix B.

4.7.3 Regulatory Setting

4.7.3.1 Federal Laws, Regulations, and Policies

Federal energy policy provides the overarching framework for energy efficiency, conservation, and consumption standards applicable to new and reconstructed buildings, including public school facilities. Relevant federal laws and programs focus on reducing building energy demand, improving equipment efficiency, and promoting efficient use of energy resources.

The Energy Policy Act of 2005 (EPAct 2005) established national goals for improving energy efficiency in buildings and authorized the U.S. Department of Energy (DOE) to develop minimum energy efficiency standards for commercial building equipment, lighting systems, and appliances. These standards apply to components commonly incorporated into school facilities and influence energy performance through required efficiencies rather than land use or operational capacity (United States Congress, 2005).

The Energy Independence and Security Act of 2007 (EISA) expanded federal energy efficiency requirements, including updated efficiency standards for lighting and electrical equipment and increased federal emphasis on reducing energy consumption in public and institutional buildings. EISA also supports improved building energy performance through enhanced codes and standards adopted and enforced at the state level (Environmental Protection Agency, 2026).

In addition, the U.S. Environmental Protection Agency's ENERGY STAR Program provides voluntary benchmarking tools and performance standards for high-efficiency building systems and equipment widely used in K–12 school design. While participation is not mandatory, ENERGY STAR criteria inform market availability of efficient products and best practices for reducing operational energy use (Clark, 2026).

Collectively, these federal policies emphasize energy efficiency through equipment standards and building performance expectations rather than prescribing specific project designs. Compliance with California's building energy codes, which are developed in part to be consistent with and exceed federal minimum standards, ensures that reconstructed school facilities would align with applicable federal energy conservation objectives.

4.7.3.2 State Laws, Regulations, and Policies

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

4.7.4 Impact Analysis

4.7.4.1 Thresholds of Significance

In accordance with Appendix G of the State CEQA Guidelines, a project would result in a significant impact related to energy and energy resources if it would:

- Result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources during construction or operation; or
- Conflict with or obstruct a state or local plan for renewable energy or energy efficiency, including adopted energy conservation goals or standards.

A project may consume energy during construction (e.g., fuel use by construction equipment and haul trucks) and operation (e.g., electricity and natural gas use for buildings). Construction-related energy use is typically short-term and temporary, while operational energy use represents a long-term demand. Energy impacts are generally evaluated qualitatively based on project characteristics, consistency with applicable building codes, and implementation of energy efficiency requirements.

For public facility reconstruction projects, such as an elementary school campus, energy consumption may be considered non-significant when the project does not increase operational capacity or intensity and is required to comply with applicable energy efficiency regulations. Compliance with the California Building Code and Title 24 energy standards, which incorporate both state and federally informed efficiency requirements, generally ensures that projects do not result in wasteful or inefficient energy use.

Impacts related to energy and energy resources would therefore be considered less than significant if the project's construction and operation would not result in an unnecessary increase in energy demand and would remain consistent with applicable energy conservation and efficiency policies.

4.7.4.2 Methodology

Energy impacts were evaluated using a qualitative assessment consistent with CEQA Guidelines Appendix G and Section 15126.2(b). Construction-related energy use was considered temporary and typical of a school

reconstruction project and would consist primarily of fuel consumption from standard construction equipment, worker vehicles, and material delivery trucks.

Operational energy use was evaluated based on the nature of the proposed project, which would partially reconstruct an existing elementary school campus without increasing student capacity, staffing levels, or intensity of use. Following reconstruction and modernization, operational energy demand would be similar to or lower than existing conditions due to compliance with current California Building Code and Title 24 energy efficiency requirements. Given the absence of expanded use and the application of modern energy standards, detailed quantitative energy modeling was not warranted.

4.7.4.3 Impacts and Mitigation Measures

4.7.4.3.a. Impact ENGY-A:

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

Less than Significant Impact

Construction-Related Energy Consumption
Energy consumption would occur during construction of the proposed project, including fuel use associated with the on-site operation of off-road equipment and vehicles traveling to and from the construction site. Construction equipment use and associated energy consumption would be typical of commonly associated with a site redevelopment project. As a result, project construction would not be anticipated to require the use of construction equipment that would be more energy efficient than those commonly used for the construction of similar projects. Furthermore, construction equipment would be more efficient than average from the use of Tier 4 Final construction equipment per Mitigation Measure AQ-1 and equipment idling would be limited to no more than five minutes in accordance with Mitigation Measure AQ-2 for the purpose of protecting air quality.

Energy use associated with construction/modernization of the proposed facilities would be temporary and would not be expected to result in the need for additional capacity, nor would construction be anticipated to result in increased peak-period demands for electricity. As a result, the construction of proposed facilities and improvements would not result in an inefficient, wasteful, or unnecessary consumption of energy. As a result, the project would result in a **less than significant impact.**

Operational Mobile-Source Energy Consumption
Operational mobile-source energy consumption from a project is primarily associated with trips to and from the project. Since the project would redevelop an existing school with no increase in capacity or enrollment, the proposed project would not result in increased fuel usage from mobile sources. There would be **no impact.**

Operational Building-Use Energy Consumption
The proposed project would redevelop an old campus, with buildings constructed between 1945 and 1970 with modern building designed to 2025 CBC, including Title 24 energy efficiency standards, ensuring the incorporation of enhanced insulation, energy-efficient lighting and appliances, low-flow water fixtures, and low water irrigation. Long-term operation of the proposed facilities would not lead to an increase in electricity consumption. There would be **no impact.**

As discussed above, the project's impact related to energy consumption would be **less than significant.**

4.7.4.3.b. Impact ENGY-B:

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

Less than Significant Impact

As discussed earlier in this report, the proposed land uses would not be anticipated to result in wasteful or unnecessary vehicle trips. As a result, the proposed project would not result in increased fuel usage that would be anticipated to conflict with applicable plans, policies, or regulations adopted to reduce future fuel consumption rates. The State of California's Energy Efficiency Strategic Plan establishes a goal for the development of buildings with net zero energy consumption. This plan includes goals for the construction of new residential, commercial, and government buildings. Adherence to current and future Title 24 energy requirements would require the installation of PV systems and an energy storage system to help to reduce the project's building-use energy consumption. The District would ensure operational energy consumption would be substantially reduced beyond those required by Title 24 building energy-efficiency requirements.

The plans for all public-school projects in California must be submitted to the Division of the State Architect (DSA) for plan review and must comply with DSA and California Energy Commission (CEC) Energy Efficiency Standards. These requirements ensure that educational facilities would not result in the inefficient, wasteful, or unnecessary consumption of energy. The project does not conflict with any City of Fresno general plan policies related to renewable energy or energy efficiency. The impact is **less than significant.**

4.8 Geology and Soils

4.8.1 Introduction

This section describes the existing environmental and regulatory setting of the project area and analyzes the potential impacts of the project on geology and soil resources. This section also describes the criteria for determining the significance of impacts, approach to assessing impacts, and possible mitigation measures.

4.8.2 Environmental Setting

4.8.2.1 Proximity to Earthquake Faults and Seismic Activity

According to the California Geological Survey, the project site's associated parcels are not within an Earthquake Fault Zone, Landslide Hazard Zone, or Liquefaction Hazard Zone (California Geological Survey, 2025). There are no known faults within the City of Fresno (County of Fresno, 2018). According to the Fresno County Multi-Jurisdictional Hazard Mitigation Plan (HMP), seismic hazard in Fresno County is relatively low, but the City of Fresno has a moderate risk for earthquake-related damage (County of Fresno, 2018). Additionally, the MHP liquefaction has not been observed within the City of Fresno (County of Fresno, 2018).

4.8.2.2 Soil Type, Drainage, and Groundwater Levels

The main project site is underlain by Greenfield sandy loam at the northwest corner, Hesperia fine sandy loam around the south and southwest section of the project, and Delhi loamy sand at the project's northeast corner (USDA, 2025). However, it should be noted that the project is an existing elementary school that has likely been covered in backfill appropriate for building construction and grassy turf fields.

Groundwater depth can be estimated using data from the California Department of Water Resources' California's Groundwater Live website. A well approximately 9 miles northeast (Site Code: 367717N1196088W001) last measured a depth to groundwater of 62.80 feet on September 30, 2025, (California Department of Water Resources, 2025). According to the North Kings Groundwater Sustainability Agency 2024 Annual Report, the project site is located downgradient from this monitoring well and the groundwater levels are approximately 110 ft deeper, according to groundwater level contour maps provided in the report (Kings Subbasin Groundwater Sustainability Agencies , 2024).

4.8.3 Regulatory Setting

4.8.3.1 Federal Laws, Regulations, and Policies

In October 1977, the U.S. Congress enacted the Earthquake Hazards Reduction Act to reduce the risk to life and property from future earthquakes through the establishment and maintenance of an effective earthquake hazards reduction program. This program was significantly amended in November 1990 when the National Earthquake Hazards Reduction Program refined agency responsibilities, program goals, and objectives. The Federal Emergency Management Agency (FEMA) was designated as the lead agency for the National Earthquake Hazards Reduction Program.

4.8.3.2 State Laws, Regulations, and Policies

4.8.3.2.a. Alquist-Priolo Earthquake Fault Zoning Act

The Alquist-Priolo Earthquake Fault Zoning Act, signed into law in 1972 (then known simply as the Alquist-Priolo Earthquake Act), requires the delineation of zones along active, potentially active, and well-defined faults. The purpose of the Alquist-Priolo Earthquake Fault Zoning Act is to identify the hazard of surface faulting so that appropriate action can be taken under the act to mitigate these hazards. The act addresses only the hazard of surface fault rupture and is not directed toward other earthquake hazards. This State law was a direct result of the 1971 San Fernando earthquake, which was associated with extensive surface fault ruptures.

4.8.3.2.b. California Seismic Hazards Mapping Act

The California Seismic Hazards Mapping Act of 1990 (PRC Sections 2690 through 2699.6) addresses seismic hazards other than surface rupture, such as liquefaction and seismically induced landslides. The purpose of the California Seismic Hazards Mapping Act is to minimize the loss of life and property through the identification, evaluation, and mitigation of seismic hazards. It specifies that the lead agency for a project may withhold development permits until geologic or soil investigations are conducted for specific sites and mitigation measures are incorporated into plans to reduce hazards of seismicity and unstable soils.

4.8.3.2.c. California Building Standards Commission

The California Building Standards Commission is authorized by the California Building Standards Law to administer the many processes related to the development, adoption, approval, publication, and implementation of California's building codes. Title 24 of the California Building Standards Code serves as the basis for the design and construction of buildings, associated facilities, and equipment in California. Where no other building codes apply, it regulates excavation, foundations, and grading activities, including drainage and erosion control.

4.8.4 Impact Analysis

4.8.4.1 Thresholds of Significance

The thresholds for determining the significance of impacts for this analysis of geology and soils are based on the environmental checklist in the State CEQA Guidelines, as amended. The project would have a significant impact on geology and soils if it would:

- expose people or structures to 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 Fault Map issued by the State Geologist for the area or based on other substantial evidence of a known fault;
    - strong seismic ground shaking;
    - seismic-related ground failure, including liquefaction;
    - or landslides;
- result in substantial soil erosion or the loss of topsoil;
- 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;

- 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; or
- have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater.

4.8.4.2 Methodology

The analysis of potential impacts was based on an evaluation of the effects of the project on the geological setting and on-site soils. Information in technical reports, the relevant USGS topographic map (Fresno South), and the *Fresno County General Plan Revised Public Review Background Report* (County of Fresno, 2000)were reviewed. In determining the extent and implications of the impacts, consideration was given to soil type and composition, and slope stability.

4.8.4.3 Impacts and Mitigation Measures

4.8.4.3.a. Impact GEO-A:

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

i. **Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.**
ii. **Strong seismic ground shaking?**
iii. **Seismic-related ground failure, including liquefaction?**
iv. **Landslides?**

No Impact

As stated in the environmental setting of this section, the project site is not located in an Earthquake Fault Zone, Landslide Hazard Zone, or Liquefaction Hazard Zone. Furthermore, the project would replace old buildings constructed between 1945 and 1970 with new buildings built to the structural and seismic standards of the 2025 CBC. The topography of the campus is level. There would be **no impact.**

4.8.4.3.b. Impact GEO-B:

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

Less than Significant Impact
The potential for soil erosion is greatest during construction, when earthwork activities disturb exposed soils. Because the project site exceeds one acre and involves ground disturbance, it must obtain coverage under State Water Resources Control Board Order 2022-0057-DWQ, the *California General Permit for Stormwater Discharges from Construction Activity* (CGP). Compliance with the CGP requires preparation and implementation of a Storm Water Pollution Prevention Plan (SWPPP), which includes best management practices designed to minimize or prevent soil erosion throughout construction.

Once construction is complete, the project site will be stabilized with hardscape or landscaping. Hardscape surfaces such as concrete, asphalt, and building footprints, and landscaped areas such as turf, mulch, rock, or

decomposed granite would cover and protect the underlying soil. Because the topsoil would be largely or entirely covered, post-construction erosion potential would be minimal. In addition, the CGP requires that sites demonstrate equal or reduced erosion potential at the end of construction in order to terminate permit coverage.

With SWPPP measures in place during construction and permanent stabilization provided by hardscape and landscaping after construction, the project would not result in substantial soil erosion. Therefore, impacts related to soil erosion would be **less than significant.**

4.8.4.3.c. Impact GEO-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

The project site is not located within an Alquist-Priolo Earthquake Fault Zone, Landslide Hazard Zone, or Liquefaction Hazard Zone, according to the California Geological Survey. There are no known active or potentially active faults within the City of Fresno. Regional studies indicate that while Fresno County experiences relatively low seismic hazard overall, the City of Fresno has a moderate risk for earthquake-related damage, largely due to the age of existing structures rather than site-specific geologic instability.

Liquefaction has not been observed within the City of Fresno, and the project site is underlain by alluvial soils typical of the eastern San Joaquin Valley. Groundwater levels beneath the site are estimated to be well below typical depths associated with liquefaction susceptibility, approximately 170 feet below ground surface based on regional groundwater contour mapping. These conditions substantially reduce the potential for liquefaction, lateral spreading, or collapse during seismic events.

The project would involve demolition and reconstruction of an existing elementary school facility on a site that has been previously graded, filled, and developed. No substantial changes to topography or geologic conditions would occur that would increase the risk of landslides, subsidence, or soil instability. In addition, all new structures would be required to comply with the latest California Building Code for seismic design and foundation standards. Therefore, this impact would be **less than significant.**

4.8.4.3.d. Impact GEO-D:

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

Less than Significant Impact

Soils underlying the project site include Greenfield sandy loam, Hesperia fine sandy loam, and Delhi loamy sand. These soil types are generally associated with granular textures and lower clay content compared to soils typically classified as highly expansive. In addition, the project site has been previously developed with school buildings, paved areas, and turf fields, and underlying soils have likely been modified or replaced with engineered fill suitable for structural development.

While site-specific expansive soil characteristics have not been identified as part of the environmental setting, reconstruction activities would be subject to compliance with applicable California Building Code requirements. The Code requires evaluation of soil conditions during project design and implementation of appropriate foundation design measures to address expansive soil conditions where present.

With compliance with current building and engineering standards, any potentially expansive soil conditions would be adequately addressed through design and construction practices and would not create a substantial risk to life or property. Therefore, this impact would be l**ess than significant.**

4.8.4.3.e. Impact GEO-E:

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

No Impact
The project would connect to the City of Fresno sewer system. It would not involve the use of septic tanks or alternative wastewater disposal systems. There would be **no impact.**

4.8.4.3.f. Impact GEO-F:

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

Less than Significant Impact with Mitigation Incorporated
The project site has been disturbed in the past by the construction of an elementary school and agricultural use prior to 1913. There are no known paleontological resources recorded for the project site. However, the possibility remains that inadvertent or accidental discoveries could occur during ground-disturbing construction activities. This is a **significant impact**.

Mitigation Measure GEO-1, below, would serve to protect the inadvertent discovery of paleontological resources.

> **MM-GEO-1**: **Inadvertent Paleontological Resource Discovery.** If paleontological resources are inadvertently discovered during ground-disturbing activities, all work within 50 feet of the discovery shall be halted and the construction supervisor shall immediately notify the District and retain a qualified paleontologist who meets the standards of the Society of Vertebrate Paleontology to evaluate the find. The paleontologist shall assess the significance of the discovered resource in accordance with CEQA Guidelines Section 15064.5 and SVP guidelines.
>
> If the find is determined to be a significant paleontological resource, the paleontologist shall develop and implement a treatment plan in consultation with the lead agency. The treatment plan may include, but is not limited to, recovery and curation of the resource at an accredited repository, documentation of the find, and preparation of a report summarizing the methods and results of the recovery. Ground-disturbing activities in the vicinity of the discovery shall not resume until the paleontologist determines that the site has been appropriately managed and cleared for continued work.

With the implementation of Mitigation Measure GEO-1, the potential impact to paleontological resources would be **less than significant with mitigation incorporated**.

4.9 Greenhouse Gases

4.9.1 Introduction

This section considers the potential for construction-related and operational greenhouse gas (GHG) emissions associated with the project to affect climate change, and identifies opportunities to avoid, reduce, or otherwise mitigate potential significant impacts. This analysis includes a description of the existing environmental setting; an overview of the GHG regulatory framework that guides the decision-making process; a summary of the assessment methodology used to model GHG emissions; thresholds and other criteria for determining impact significance; an analysis of impacts; and mitigation measures as necessary.

An Air Quality & Greenhouse Gas Impact Analysis report was prepared for this project by Blair, Church & Flynn Consulting Engineers and is included as Appendix B of this DEIR. The following section incorporates analysis from the report and evaluates the project's impact to Greenhouse Gases.

4.9.2 Environmental Setting

Certain gases in the earth's atmosphere, classified as GHGs, play a critical role in determining the earth's surface temperature. A portion of the solar radiation that enters the earth's atmosphere is absorbed by the earth's surface, and a smaller portion of this radiation is reflected back toward space. Infrared radiation is absorbed by GHGs; as a result, infrared radiation released from the earth that otherwise would have escaped back into space is instead "trapped," resulting in a warming of the atmosphere. This phenomenon, known as the "greenhouse effect," is responsible for maintaining a habitable climate on Earth. GHGs are present in the atmosphere naturally, are released by natural and anthropogenic sources, and are formed from secondary reactions taking place in the atmosphere.

Global warming potential (GWP) is a concept developed to compare the ability of each GHG to trap heat in the atmosphere relative to carbon dioxide (CO_2). The GWP of a GHG is based on several factors, including the relative effectiveness of a gas to absorb infrared radiation and the length of time (i.e., lifetime) that the gas remains in the atmosphere ("atmospheric lifetime"). The reference gas for GWP is CO_2; therefore, CO_2 has a GWP of 1. The other main GHGs that have been attributed to human activity include methane (CH_4), which has a GWP of 28, and nitrous oxide (N2O), which has a GWP of 265 (IPCC 2013). For example, 1 ton of CH_4 has the same contribution to the greenhouse effect as approximately 28 tons of CO_2. GHGs with lower emissions rates than CO_2 may still contribute to climate change, because they are more effective at absorbing outgoing infrared radiation than CO2 (i.e., high GWP). The concept of CO_2 equivalents (CO_2e) is used to account for the different GWP potentials of GHGs to absorb infrared radiation. GHG emissions are typically measured in terms of pounds or tons of CO_2e, and are often expressed in metric tons of CO_2 equivalent ($MTCO_2e$).

4.9.3 Regulatory Setting

4.9.3.1 Federal Laws, Regulations, and Policies

Climate change and greenhouse gas (GHG) reduction are also addressed at the federal level. In December 2009, the U.S. Environmental Protection Agency (EPA) issued a finding under Section 202(a) of the Clean Air Act determining that six key GHGs endanger public health and welfare. Based on this finding, EPA adopted regulations

to limit GHG emissions from new motor vehicles and certain stationary sources and established a renewable fuel standard program.

In October 2011, the Interagency Climate Change Adaptation Task Force released the *National Action Plan—Priorities for Managing Freshwater Resources in a Changing Climate*. This plan describes how climate change may affect water resources and identifies adaptation strategies to protect water supplies, public health and safety, water quality, and aquatic ecosystems.

In September 2009, EPA adopted the Mandatory Greenhouse Gas Reporting Rule, which requires major sources of GHG emissions to report their emissions annually. The rule applies to facilities that emit 25,000 metric tons of carbon dioxide equivalent ($MTCO_2e$) or more per year, as well as certain fuel suppliers and manufacturers. Covered facilities must submit annual reports and maintain records to allow EPA to verify reported emissions.

In December 2014, the Council on Environmental Quality (CEQ) issued revised draft guidance on addressing GHG emissions and climate change under the National Environmental Policy Act (NEPA). The guidance recommends that federal agencies consider both (1) the GHG emissions generated by a proposed action and (2) the potential effects of climate change on the project. It also advises agencies to determine the appropriate level of analysis, whether qualitative or quantitative, based on the scope of the project. The guidance identifies 25,000 $MTCO_2e$ per year as a general reference point below which a detailed quantitative analysis may not be necessary unless it can be readily completed.

4.9.3.2 State Laws, Regulations, and Policies

California has launched major initiatives for reducing GHG emissions. ARB is the agency responsible for coordination and oversight of State and local air pollution control programs in California and for implementing the CCAA.

4.9.3.2.a. Assembly Bill 1493 (AB 1493)

AB 1493 requires the California Air Resources Board (ARB) to adopt regulations to reduce greenhouse gas (GHG) emissions from passenger vehicles, including automobiles and light-duty trucks. These standards were originally intended to apply beginning with the 2009 model year. In June 2009, the U.S. Environmental Protection Agency (EPA) granted California a waiver under the Clean Air Act, allowing the State to implement its own vehicle GHG emission standards. California subsequently coordinated with federal agencies to establish joint standards for model years 2017 through 2025.

4.9.3.2.b. Executive Order S-3-05

Executive Order S-3-05, issued in 2005, recognizes California's vulnerability to climate change, including reduced snowpack in the Sierra Nevada, worsening air quality, and rising sea levels. The order establishes statewide GHG reduction targets of returning to 2000 levels by 2010, 1990 levels by 2020, and 80 percent below 1990 levels by 2050.

4.9.3.2.c. Assembly Bill 32 (AB 32)

The California Global Warming Solutions Act of 2006 (AB 32) codifies the State's goal of reducing GHG emissions to 1990 levels by 2020 and designates ARB as the lead agency responsible for implementing measures to achieve this target.

In 2008, ARB adopted the Climate Change Scoping Plan, which outlines the primary strategies for reducing statewide GHG emissions. The Scoping Plan identifies emission reduction measures across multiple sectors and recognizes that land use decisions influence emissions from transportation, energy use, and other activities.

ARB is required to update the Scoping Plan at least every five years. Updates adopted in 2014 and subsequent years evaluate progress and identify additional actions needed to achieve the State's GHG reduction goals.

4.9.3.2.d. Executive Order S-1-07

Executive Order S-1-07, issued in 2007, identifies the transportation sector as the largest source of GHG emissions in California. The order established a goal to reduce the carbon intensity of transportation fuels by at least 10 percent by 2020. This goal led to the development of the State's Low Carbon Fuel Standard program, which supports long-term GHG reduction goals for 2030 and 2050.

4.9.3.2.e. Senate Bill 97 (SB 97)

SB 97 required the Governor's Office of Planning and Research to develop amendments to the State CEQA Guidelines to address GHG emissions. These amendments became effective in 2010 and provide direction for evaluating GHG impacts under CEQA.

4.9.3.2.f. Senate Bill 375 (SB 375)

SB 375 links regional transportation planning with land use and housing decisions to reduce GHG emissions. The law requires metropolitan planning organizations to adopt a Sustainable Communities Strategy (SCS) as part of their Regional Transportation Plan. The SCS outlines land use patterns and transportation measures designed to meet regional GHG reduction targets established by ARB. If the SCS does not achieve the targets, an Alternative Planning Strategy must be prepared.

4.9.3.2.g. Executive Order B-30-15

Executive Order B-30-15, issued in 2015, establishes an interim statewide target to reduce GHG emissions to 40 percent below 1990 levels by 2030. This target builds on AB 32 and supports the longer-term goal of reducing emissions 80 percent below 1990 levels by 2050.

4.9.3.2.h. California Climate Adaptation Strategy

The 2009 California Climate Adaptation Strategy, prepared by the California Natural Resources Agency, summarizes anticipated climate change impacts and identifies strategies to improve resilience across key sectors, including public health, water resources, agriculture, and energy. This effort was updated in 2014 through *Safeguarding California: Reducing Climate Risk*, which provides additional guidance for adapting to climate change effects.

4.9.4 Impact Analysis

4.9.4.1 Methodology

Construction and operational greenhouse gas (GHG) emissions associated with the project were estimated using CalEEMod version 2022.1.1.45. Construction emissions were modeled for demolition, site preparation, grading,

paving, building construction, and architectural coatings based on the anticipated construction schedule provided by the District. Because specific construction equipment selections have not yet been determined, CalEEMod default equipment assumptions were used.

Operational emissions were estimated using CalEEMod emission factors for area sources, energy use, water and wastewater conveyance, and solid waste generation. Because the project would modernize and replace facilities at an existing elementary school campus without increasing student capacity, staffing, enrollment, or overall campus activity, operational mobile-source emissions were conservatively assumed to result in no net increase over existing conditions. Additionally, the proposed facilities would be constructed in compliance with current Title 24 building energy efficiency standards and are expected to operate more efficiently than the existing campus. Model inputs, assumptions, and output files are provided in the appendix of the Air Quality and Greenhouse Gas Impact Analysis (Appendix B).

4.9.4.2 Thresholds of Significance

The thresholds for determining the significance of impacts for this analysis of GHG emissions are based on the environmental checklist in the State CEQA Guidelines, as amended. The project would have a significant impact on GHG emissions if it would:

- generate GHG 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 reducing the emissions of GHGs.

In accordance with the SJVAPCD's Guidance for Valley Land-use Agencies in *Addressing GHG Emission Impacts for New Projects Under CEQA* (San Joaquin Valley Air Pollution Control District, 2009) a project would be considered to have a less than significant impact on climate change if it would comply with at least one of the following criteria:

- Comply with an approved GHG emission reduction plan or GHG mitigation program which avoids or reduces GHG emissions within the geographic area in which the project is located. Such plans or programs must be specified in law or approved by the lead agency with jurisdiction over the affected resource and supported by a CEQA compliant environmental review document adopted by the lead agency, or
- Implement approved best performance standards, or
- Quantify project GHG emissions and reduce those emissions by at least 29 percent compared to BAU.

The SJVAPCD has not yet adopted BPS for development projects. The quantification of project-generated GHG emissions in comparison to BAU conditions to determine consistency with AB 32's reduction goals is considered appropriate in some instances. However, based on the California Supreme Court's decision in *Center for Biological Diversity v. California Department of Fish and Wildlife and Newhall Land and Farming (2015) 224 Cal. App. 4th 1105* (CBD vs. CDFW; also known as the "Newhall Ranch case"), substantial evidence would be need to be provided to document that project-level reductions in comparison to a BAU approach would be consistent with achieving AB 32's overall statewide reduction goal. Given that AB 32's statewide goal includes reductions that are not necessarily related to an individual development project, the use of this approach may be difficult to support given the lack of substantial evidence to adequately demonstrate a link between the data contained in the AB 32 Scoping Plan and individual development projects. Alternatively, the Court identified potential options for evaluating GHG impacts for individual development projects, which included a qualitative approach based on consistency with statewide, regional, and local plans (Supreme Court of California, 2015).

As of August 2026, neither the County of Fresno nor CARB have adopted recommended numerical GHG significance thresholds applicable to development projects for CEQA purposes. However, the Fresno Council of Governments has adopted its Priority Climate Action Plan (PCAP) as of April 2026. The CCAP outlines five draft measures for the transportation sector, four for the agricultural sector, ten for the building energy sector, and four for the waste sector (Fresno Council of Governments, 2024). Applicable measures are analyzed in the impact analysis below for consistency.

Therefore, the methodology for evaluating the project's impacts related to GHG emissions focuses on its consistency with statewide, regional, and local plans that have been adopted for the purposes of reducing and mitigating GHG emissions. This approach has been deemed appropriate for analyzing a project's GHG impact by the Governor's Office of Planning and Research (OPR) and has been upheld in court challenges (Governor's Office of Planning and Research, 2018) (Mission Bay Alliance v. Office of Community Investment & Infrastructure, 2016). The evaluation of consistency with such plans serves as the sole basis for determining the significance of the project's GHG- related impacts to the environment. The project's GHG emissions have been quantified and are included in this report for informational purposes.

4.9.4.3 Impacts and Mitigation Measures

4.9.4.3.a. Impact GHG-A:

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

Less Than Significant with Mitigation Incorporated

The significance of the project's greenhouse gas emissions is evaluated based on consistency with applicable plans, policies, and regulations adopted to reduce GHG emissions as discussed in Section 4.9.4.2 *Thresholds of Significance*. As discussed under Impact GHG-B, with the implementation of Mitigation Measure GHG-1, the project would not conflict with applicable statewide, regional, or local GHG reduction measures. Therefore, the project would not generate greenhouse gas emissions, either directly or indirectly, that would have a significant impact on the environment. The estimate of greenhouse gas emissions that would result from the project is provided for informational purposes in Impact GHG-B. This impact would be **less than significant with mitigation incorporated.**

4.9.4.3.b. Impact GHG-B:

Would the project Conflict with any applicable plan, policy, or regulation of an agency adopted to reduce the emissions of greenhouse gases?

Less than Significant Impact with Mitigation Incorporated

GHG Emission Estimates

Short-term Construction

Construction-generated GHG emissions are summarized in Table 16. As shown, construction of the facility would generate about 395.08 $MTCO_2e$. Amortized GHG emissions, when averaged over an assumed 30-year life of the project, would total approximately 13.17 $MTCO_2e$/year. Construction-generated emissions would vary, depending on the final construction schedules, equipment required, and activities conducted.

TABLE 16: CONSTRUCTION GHG EMISSIONS

Construction Year	Annual Emissions ($MTCO_2e$/Year)
Phase 1 2028	195.53
Phase 1 2029	150.58
Phase 2 2029	48.97
Total Construction Emissions:	395.08
Amortized Net Change in Construction Emissions[1]:	13.17
1 Amortized emissions are quantified based on an estimated 30-year project life. *Refer to Appendix B for emissions modeling assumptions and results.*	

Long-term Operation

Table 17 summarizes the project's increase of operational GHG emissions for the operational years per phase of Phase 1 2029 and Phase 2 2029 compared to existing operation of current land uses. Including amortized construction emissions, total annual GHG emissions are estimated at 220.79 metric tons of CO_2 equivalent ($MTCO_2e$) in for Phase 1 2029 and 14.07 $MTCO_2$ from Phase 2 2029. Most emissions, 83.58%, would come from energy use, while 11.53% would come from waste generation.

TABLE 17: OPERATIONAL GHG EMISSIONS (UNMITIGATED)

	GHG Emissions ($MTCO_2e$ per year)[1]		
Emissions Source	**Phase 1 2029**	**Phase 2 2029**	**Percent of Total GHG Emissions**
Mobile Sources	0.00	0.00	0.00
Area Sources	0.92	0.00	0.41
Energy Use	179.52	5.77	83.58
Water Use	3.21	0.45	1.65
Waste Generation	25.56	0.00	11.53
Refrigeration	0.04	6.22	2.82
Total Operational Emissions:	209.25	12.44	
Amortized Construction Emissions:	11.54	1.63	
Total Phase Emissions:	220.79	14.07	
Total Project Emissions:	234.86		
1 Project-generated emissions were quantified using the CalEEMod computer program. *Refer to Appendix B for modeling results and assumptions.*			

Consistency With Applicable Plans

As previously discussed, compliance with applicable GHG reduction plans would result in a less than significant impact from project-generated GHG emissions. The FCOG has adopted the 2022 Regional Transportation Plan and Sustainable Communities Strategies (RTP/SCS) (Fresno Council of Governments, 2022) and a Priority Climate Action Plan (PCAP) (Fresno Council of Governments, 2024), and has prepared a draft Comprehensive Climate Action Plan (CCAP) (Fresno Council of Governments, 2025) that include measures to reduce GHG emissions. Additionally, relevant measures aimed at reducing operational GHG emissions are included the CARB's 2022 Climate Change

Scoping Plan (California Air Resources Board, 2023). The project's consistency with these plans is further detailed below.

CARB's 2022 Climate Change Scoping Plan

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

Key strategies to achieve SB 32's goals include promoting sustainable communities through zero net energy buildings and enhanced transportation options that reduce vehicle miles traveled (VMT). Additional measures focus on increasing the use of low-carbon fuels and cleaner vehicles. Analysis of consistency with measures from the CARB's 2022 Scoping Plan are discussed below in Table 18.

TABLE 18: CONSISTENCY ANALYSIS WITH CARB'S 2022 SCOPING PLAN

Measure/Action	Consistency Analysis
Smart Growth/VMT Reduction: VMT per capita reduced 25% below 2019 levels by 2030, and 30% below 2019 levels by 2045.	The project would not result in increased student capacity or student enrollment. Therefore, the project would not result in additional VMT. The Project is **Consistent.**
Light-duty Vehicle (LDV) Zero Emission Vehicles (ZEVs): 100% of Light Duty Vehicle sales by 2035.	The project site is owned and operated by the Fresno Unified School District. As vehicles are retired towards 2035, the District would purchase ZEV LDVs, as required by State regulations. Parking areas would be equipped with charge ready EV charging stations to per 2025 Title 24 code supporting this future fleet conversion. The Project is **Consistent.**
Truck ZEVs: 100% medium duty (MDV)/HDV sales are ZEV by 2040.	The project site is owned and operated by the Fresno Unified School District. As vehicles are retired towards 2040, the District would purchase ZEV LDVs, as required by State regulations. Parking areas would be equipped with charge ready EV charging stations to per 2025 Title 24 code supporting this future fleet conversion. The Project is **Consistent.**
New Residential and Commercial Buildings: All electric appliances installed for commercial development starting 2029	**Consistent with mitigation.** Despite the Project starting before 2029, to align with CARB's GHG reduction goals, the project would implement MM GHG-1 to limit the construction of natural gas infrastructure and use of natural gas appliances, and prioritize electrical appliances as feasible. Additionally, the project would comply with the requirements listed in 2025 Title 24 code which require and/or promote energy-efficient appliances.
Developed Lands: Increase forestry investment by 200% above current levels and utilize tree watering that is 30% less sensitive to drought.	The project would add more trees with drought tolerant irrigation to the site per CALGreen code. The project is **Consistent.**
Decarbonize Buildings. All electric appliances in new construction beginning 2029 (Commercial).	**Consistent with mitigation.** The project would limit use of natural gas appliances through MM GHG-1.

Non-applicable measures related to aviation, ocean-going vessels, freight/rail, oil and gas, existing residential and commercial buildings, manufacturing, agricultural production, fuel production, landfill operations, and protection working and natural lands, and of forests, shrublands, grasslands, wetlands are omitted.

(California Air Resources Board, 2023)

As discussed in Table 18, the Project is consistent with all applicable measures/actions of the CARB 2022 Scoping Plan.

To support the state's GHG reduction targets, including those under SB 32, California enacted the Sustainable Communities and Climate Protection Act (SB 375). This law requires regional metropolitan planning organizations, such as FCOG, to develop Sustainable Communities Strategies (SCSs) that integrate transportation, housing, and land use planning to help achieve state-mandated GHG reductions. The implementation of SCSs aims to lower per capita emissions from mobile sources by reducing per capita VMT. Compliance with GHG reduction goals and policies from the FCOG are discussed in the sections below.

FCOG 2022 Regional Transportation Plan and Sustainable Communities Strategies

The FCOG's 2022 RTP/SCS outlines transportation strategies aimed at reducing regional GHG emissions. Based on the rationale in this study, the project would not increase vehicle miles traveled (VMT), demonstrating that the project aligns with planned growth and the objectives set forth in the FCOG's 2022 RTP/SCS. Analysis of all relevant measures is shown below in Table 19 below.

TABLE 19: CONSISTENCY ANALYSIS WITH FCOG'S TRANSPORTATION PLAN AND SUSTAINABLE COMMUNITIES GOALS

Goal	Project Consistency
Goal 1: Improved mobility and accessibility for all.	The project site currently has sidewalk along its entire perimeter. Additionally, the school has an existing crosswalk halfway between Jensen and Kaviland Avenues along Cedar Avenue to improve pedestrian access to the school. The project would abide by any requirements by the City of Fresno to further improve pedestrian access. The project is **consistent**.
Goal 2: Vibrant communities that are accessible by sustainable transportation options.	The project is located next to a bus stop along a high quality transportation corridor (Route 38). The project would not result in the relocation of this bus route. The project is **consistent**.
Goal 3: A safe, well-maintained, efficient, and climate-resilient multimodal transportation network.	As mentioned previously, the project is located next to a high quality transportation corridor and would not alter the quality of this transportation corridor. The project is **consistent**.
Goal 4: A transportation network that supports a sustainable and vibrant economy.	As mentioned previously, the project is located next to a high quality transportation corridor and would not alter the quality of this transportation corridor. The project is **consistent**.
Goal 5: A region embracing clean transportation, technology, and innovation.	The Project would be constructed in compliance with 2025 Title 24 code EV parking spaces. Additionally, the District,

	would replace school buses with EV buses, as required by State regulations. The Project is **consistent**.
(Fresno Council of Governments, 2022)	

As discussed in Table 17, the Project is consistent with all applicable goals of the FCOG's PCAP GHG reduction goals.

FCOG Priority Climate Action Plan

The FCOG's PCAP outlines five draft measures for the transportation sector, ten for the building energy sector, and four for the waste sector. Analysis of consistency with relevant measures are shown below in Table 20.

TABLE 20: CONSISTENCY ANALYSIS WITH FCOG'S PRIORITY CLIMATE ACTION PLAN

GHG Reduction Measure	Project Consistency Analysis
Transportation Sector	
1) EV Strategy: Develop a robust electric vehicle charging network in Fresno County, including in disadvantaged communities, to increase electric vehicle adoption in Fresno County.	The Project would be constructed in compliance with 2025 Title 24 code parking spaces. The Project is **consistent**.
2) Municipal Fleet Conversion: Continue to convert the municipal fleet (including transit) into zero-emission vehicles and provide a sustainable and reliable support system for such zero-emission fleet, which could include, but not limited to: maintenance, charging facilities, training of personnel, etc. (Implementing measures could include fleet electrification, installation of electric vehicle charging infrastructure, etc.)	The Project is not a transportation Project. The Project would not increase VMT, so this measure is **not applicable** to the project. The District plans to electrify its fleet of vehicles through other projects to meet the State's climate goals.
3) Bike and Pedestrian Network: Build a well-connected bike and pedestrian system that provides alternative transportation options, including micro-mobility such as shared e-bikes and e-scooters. Implementing measures could include pedestrian network improvements, bike parking, expanded bikeway networks, electric bikeshare programs, scooter share programs, dedicated sand for bike trails.	The site currently has a bike lane along Cedar Avenue and sidewalks around its entire perimeter. The project is **consistent.**
4) Public Transportation: Enhance the public transportation system by maintaining/expanding the existing transit system and implementing other transit strategies such as micro transit.	**Not applicable.**
5) Carpool/Vanpool and Other Shared Mobility Options: Provide incentives for carpool and vanpool, and other shared mobility options. (Implementation measures could include commute trip reduction programs, end-of-trip facilities, car-sharing programs, employer-sponsored vanpool/shuttle, priced workplace parking, and/or employee parking "cash-out" programs.)	The District will provide school bus trips to the project site. The project is **consistent.**

Building Energy Sector		
1)	**Incentive Programs for the Purchase of Certified Energy Efficient Appliances:** Incentive programs for the purchase of certified energy-efficient appliances, heating and cooling equipment, lighting, and building products to replace inefficient products. (Implementation could include air distribution system updates such as right-sizing fan system equipment and converting to a variable-air-volume system, heating and cooling system upgrades, reductions in supplemental energy load consumption by installing ENERGY STAR equipment, window films, and adding insulation or reflective roof coating and/or installation of energy-efficient lighting.)	**Consistent with mitigation.** The project would limit use of natural gas appliances through MM GHG-1.
2)	**Incorporate Water Efficiency Measures:** Incorporate water efficiency measures that reduce water heating energy consumption by installing alternative types of water heaters in place of gas storage tank heaters in residences.	**Consistent with mitigation.** The project would limit use of natural gas appliances through MM GHG-1.
3)	**Bundle On-Site Renewable Energy Generation:** Bundle on-site renewable energy generation with energy efficiency improvements in residences and commercial buildings (Implementation could include establishment of on-site renewable energy systems such as solar power with fuel cells and battery storage, biomass combustion, and/or wind power, limitations on non-renewable energy sources.)	The project would abide by the requirements in the 2025 Title 24 code which include the on-site solar PV and battery storage systems. The project is **consistent**.
Measures for Solid Waste and Wastewater Sector and Agriculture Sector were deemed not applicable to the project and are omitted. (Fresno Council of Governments, 2024)		

As discussed in Table 20, the Project is consistent with all applicable measures or the intent of the FCOG's PCAP GHG reduction measures that do not directly apply to the project.

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

> **MM-GHG-1: Building Electrification and Reduction of Natural Gas Use.** Building design shall prioritize all-electric mechanical equipment and appliances. The project shall limit the installation and use of natural gas infrastructure to the extent feasible and shall incorporate energy-efficient systems that would minimize greenhouse gas emissions associated with building operations.

Mitigation Measure GHG-1 would reduce operational greenhouse gas emissions by prioritizing building electrification and limiting the installation and use of natural gas infrastructure, appliances, and mechanical systems to the extent feasible. With implementation of Mitigation Measure GHG-1, and as discussed above, the proposed project would be consistent with the California Air Resources Board's (CARB) 2022 Climate Change Scoping Plan, the Fresno Council of Governments' (FCOG) 2022 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), and the FCOG's Public Charging Action Plan (PCAP). Collectively, these measures would contribute the project's fair share toward achieving the State's carbon neutrality goal by 2045, as outlined in Executive Order B-55-18.

With mitigation incorporated, the project's greenhouse gas emissions would not result in a significant environmental impact and would not conflict with applicable greenhouse gas reduction policies, plans, or regulations. Therefore, this impact would be considered **less than significant with mitigation incorporated**.

4.10 Hydrology and Water Quality

4.10.1 Introduction

This section describes the existing environmental and regulatory setting of the project area and analyzes the potential impacts of the project on hydrology and water quality. This section also describes the criteria for determining the significance of impacts, approach to assessing impacts, and possible mitigation measures.

4.10.2 Environmental Setting

4.10.2.1 Surface Waters

There are no water bodies located on the project site. Stormwater at the Project site is generated by impervious surfaces (concrete, asphalt, roofs) and to a lesser extent pervious surfaces, and discharges to on-site stormwater drain inlets or discharges off-site via surface discharges. Stormwater generated at the Project site either enters underground stormwater pipelines which connect to Fresno Metropolitan Flood Control District (FMFCD) underground pipelines or is collected by street storm drain inlets which connect to FMFCD underground pipelines.

Stormwater or non-stormwater runoff that enters the public storm drainage system is directed to the stormwater retention basin, Basin "II1," located to the west of the project. This basin may be potentially connected to Waters of the US (WOTUS).

4.10.2.2 Groundwater

The groundwater basin that the project site is located is called the Kings Subbasin. The groundwater gradient around the site is a general flow southwest (Kings Subbasin Groundwater Sustainability Agencies , 2024). A well approximately 9 miles northeast (Site Code: 367717N1196088W001) last measured a depth to groundwater of 62.80 feet on September 30, 2025 (California Department of Water Resources, 2025). According to the North Kings Groundwater Sustainability Agency 2024 Annual Report, the project site is located downgradient from this monitoring well and the groundwater levels are approximately 110 ft deeper, according to groundwater level contour maps provided in the report (Kings Subbasin Groundwater Sustainability Agencies , 2024). The groundwater at the site can therefore be estimated to be approximately 173 ft below ground surface.

4.10.3 Regulatory Setting

4.10.3.1 Federal Laws, Regulations, and Policies

4.10.3.1.a. Clean Water Act

The CWA is the primary federal law that protects the quality of the nation's surface waters, including lakes, rivers, and coastal wetlands. The key sections pertaining to water quality regulation are Sections 303(d), 401, 402, and 404. Under CWA, Congress recognized the primary responsibility and rights of states to prevent, reduce, and eliminate pollution, and to plan the development and use (including restoration, preservation, and enhancement) of land and water resources. The SWRCB and its nine RWQCBs implement Sections 303(d), 401, and 402 at the State level.

Clean Water Act Section 303(d)

Under Section 303(d), the State is required to identify "impaired water bodies" (those not meeting established water quality standards), identify the pollutants causing the impairment, establish priority rankings for waters on the list, and develop a schedule for development of control plans to improve water quality. EPA then approves the State's recommended list of impaired waters or adds to and/or removes water bodies from the list. Each RWQCB must update the Section 303(d) list every two years. Water bodies on the list have no further assimilative capacity for the identified pollutant, and the Section 303(d) list identifies priorities for development of pollution control plans for each listed water body and pollutant.

The pollution control plans triggered by the CWA Section 303(d) list are called TMDLs. The TMDL is a "pollution budget" designed to restore the health of a polluted body of water and ensure the protection of beneficial uses. The TMDL also contains the target reductions needed to meet water quality standards and allocates those reductions among the pollutant sources in the watershed (point sources, nonpoint sources, and natural sources) (40 CFR 130.2).

Clean Water Act Section 401

CWA Section 401 requires that water quality be evaluated when a proposed activity needing a federal license or permit can result in a discharge to waters of the United States. In California, the SWRCB and its nine RWQCBs issue water quality certifications. Each RWQCB is responsible for implementing Section 401, in compliance with the CWA and its water quality control plan (also known as a basin plan). Applicants for a federal license or those wanting to conduct activities that may result in the discharge to waters of the United States (including wetlands) also must obtain a Section 401 water quality certification, so that any such discharge complies with the applicable provisions of the CWA. Compliance with Section 401 is required for all projects that have a federal component and may affect State water quality.

Clean Water Act Section 402

CWA Section 402 regulates point-source discharges to surface waters (other than dredged or fill material) through the NPDES Permit program, administered by EPA. The program provides for both general permits (those that cover several similar or related activities) and individual permits for discharges to waters of the United States. This regulation is implemented at the State level and is described further below.

Clean Water Act Section 404

CWA Section 404 regulates the discharge of dredged and fill materials into waters of the United States, which include all navigable waters, their tributaries, and some isolated waters, as well as some wetlands adjacent to the aforementioned waters (33 CFR 328.3).

Areas typically not considered to be jurisdictional waters include nontidal drainage and irrigation ditches excavated on dry land, artificially irrigated areas, artificial lakes or ponds used for irrigation or stock watering, small artificial water bodies such as swimming pools, and water-filled depressions (33 CFR 328). Areas meeting the regulatory definition of waters of the United States are subject to the jurisdiction of USACE under provisions of CWA Section 404. Construction activities involving placement of fill into jurisdictional waters of the United States are regulated by USACE through permit requirements. No USACE permit is effective in the absence of State water quality certification, pursuant to CWA Section 401.

4.10.3.1.b. National Pollutant Discharge Elimination System Permit Program

The NPDES permit program was established under the CWA to regulate municipal and industrial discharges to surface waters of the United States. In California, EPA delegates much of the implementation of the CWA to the SWRCB. Although the SWRCB has issued a few NPDES permits, the vast majority of NPDES permits are issued by the nine RWQCBs. The discharge of wastewater to surface waters is prohibited unless an NPDES permit issued by the applicable RWQCB allows that discharge. NPDES permit regulations have been established for broad categories of discharges, including point-source municipal waste discharges and nonpoint-source stormwater runoff. An NPDES permit generally identifies limits applicable to effluent (post-treated flows) and receiving waters that restrict the allowable concentrations and/or mass emissions contained in the discharge; prohibitions on discharges not specifically allowed under the permit; and provisions that describe required actions by the discharger, including industrial pretreatment, pollution prevention, self-monitoring, and other activities. Typically, an NPDES permit is issued for a 5-year term.

4.10.3.1.c. Federal Emergency Management Agency

FEMA administers the National Flood Insurance Program to provide subsidized flood insurance to communities that comply with FEMA regulations, limiting development in floodplains. Under this program, if a community adopts and enforces a floodplain management ordinance to reduce future flood risks to new construction in Special Flood Hazard Areas, flood insurance is made available in the community. Floodplain management ordinances are designed to prevent new developments from increasing the flood threat, and to protect new and existing buildings from anticipated flooding. FEMA also issues flood insurance rate maps that identify land areas subject to flooding. These maps provide flood information and identify flood hazard zones in communities. The design standard for flood protection is established by FEMA; the minimum level of flood protection for new development is the 1-in-100 annual exceedance probability event (i.e., the 100-year flood event).

4.10.3.1.d. Executive Order 11988: Floodplain Management

EO 11988 (Floodplain Management), issued in 1977, addresses floodplain issues related to public safety, conservation, and economics. This EO generally requires federal agencies that are constructing, permitting, or funding a project in a floodplain to:

- avoid incompatible floodplain development,
- be consistent with the standards and criteria of the National Flood Insurance Program, and
- restore and preserve natural and beneficial floodplain values.

4.10.3.2 State Laws, Regulations, and Policies

4.10.3.2.a. Porter-Cologne Water Quality Act

The Porter-Cologne Water Quality Act was enacted in 1969 and created to regulate the water quality of California's surface waters, groundwaters, and wetlands. This Act established the nine Regional Water Quality Control Board and the single State Water Board. One task of the Regional Water Quality Control Boards (RWQCBs) is to establish Basin Plans, which are water quality objectives for waterbodies within their jurisdiction. Another task of the RWQCBs is to establish the CWA Section 303(d) lists of impaired water bodies. Basin "II1" does not have any listed 303(d) impairments (California Water Boards, 2025).

4.10.3.2.b. Sustainable Groundwater Management Act of 2014

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

Per the Sustainable Groundwater Management Act (SGMA), the project is located in the North Kings Groundwater Sustainability Agency (GSA) area (CA Dept. of Water Resources, 2025). This Basin is considered high priority and critically over-drafted (CA Dept. of Water Resources, 2025).

4.10.4 Impact Analysis

4.10.4.1 Thresholds of Significance

The thresholds for determining the significance of impacts for this analysis of hydrology and water quality are based on the environmental checklist in the State CEQA Guidelines, as amended. The project would have a significant impact on hydrology or water quality if it would:

- violate any water quality standards or WDRs;
- substantially deplete groundwater supplies or interfere substantially with groundwater recharge so that there would be a net deficit in aquifer volume or a lowering of the local groundwater table;
- substantially alter existing drainage patterns, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site;
- substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on-site or off-site;
- create or contribute runoff which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff;
- otherwise substantially degrade water quality;
- place housing within a 100-year floodplain hazard area as mapped on flood hazard delineation maps;
- place structures within a 100-year flood hazard area that would impede or redirect flood flows;
- expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam, or inundation by seiche, tsunami, or mudflow.

4.10.4.2 Methodology

The analysis of potential hydrology and water quality impacts was performed qualitatively, based on a review of documents pertaining to the study area, including the *Fresno County General Plan and Background Report* (County of Fresno, 2000); *California Water Bulletin 118* (California Department of Water Resources, 2025); FEMA's flood insurance rate map (Federal Emergency Management Agency, 2025); and specific study area conditions.

The analysis of impacts on hydrology and water quality includes considerations that the project would be subject to the Construction General Permit to require a SWPPP including standard procedures and BMPs related to water quality, grading, erosion control, stormwater runoff, and floodplain alteration, including compliance with regulatory requirements and ordinances and design standards.

4.10.4.3 Impacts and Mitigation Measures

4.10.4.3.a.Impact HYD-A:

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

Less than Significant Impact
The construction of the project would be subject to the California Construction General Permit (CGP), which is the general NPDES permit for construction stormwater discharges. The CGP requires projects to implement stormwater quality Best Management Practices (BMPs) to prevent or reduce stormwater pollution, which include erosion prevention BMPs, sediment control BMPs, non-stormwater discharge prevention BMPs, and waste and material management BMPs.

The project would also be subject to any stormwater quality management requirements issued by the local MS4 NPDES permittees, primarily FMFCD. These requirements would include requirements to implement construction stormwater best management practices (BMPs), prohibitions of unauthorized non-stormwater discharges (such as discharges of wastewater to the public stormwater system), requirements to reduce pesticide and herbicide usage, and requirements to manage trash to prevent disposal of trash into stormwater systems. These requirements also include BMPs that would be implemented for various activities, such as landscape maintenance and facility maintenance (e.g., preventing wash water from flowing to the storm drain system, cleaning up grass clippings that have fallen into nearby streets, or reducing or eliminating irrigation runoff).

The project would prevent discharges of contaminants to groundwater by complying with local, State, and Federal regulations, as explained in Section E.9 – *Hazards and Hazardous Materials*.

Ultimately, any stormwater or accidental non-stormwater discharges from the site would enter the public stormwater drainage system, which would flow to Basin "II1" which would provide water quality treatment.

Considering that the project would implement stormwater BMPs during construction and operation, and considering that the project would implement FMFCD, State, and Federal requirements to prevent pollution to the stormwater drainage system and the groundwater aquifer, the project would have a **less than significant impact.**

4.10.4.3.b.Impact HYD-B:

Would the project substantially deplete 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 project receives its water from the City of Fresno. The City of Fresno receives its water from multiple sources, including groundwater sources. As the City of Fresno is a service provider and a member of the North Kings GSA, the project would abide by any water saving measures required by the City of Fresno to ensure a sustainable groundwater aquifer. Furthermore, the project would redevelop an existing campus that would continue to operate using domestic water sources. The redesigned school would include more water efficient appliances and landscaping than the existing old school facility. The project would therefore have a **less than significant impact.**

4.10.4.3.c.Impact HYD-C:

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

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

As mentioned previously, the project would implement the requirements of the CGP including the requirement to reduce erosion and siltation. The project would have a **less than significant impact**.

Substantially increase the rate or amount of surface

The project is within the jurisdiction of the Fresno Metropolitan Flood Control District (FMFCD) and would discharge its runoff to the public storm drainage system owned and operated by FMFCD. FMFCD has master planned its stormwater drainage system and would require the project to comply with surface runoff rate and volume standards to prevent flooding onsite or offsite. The project would have a **less than significant impact.**

Runoff in a manner which would result in flooding on or off-site?

As mentioned previously, FMFCD has master planned its stormwater drainage system and would require that the project reduce any exceedances in the project parcel's master planned runoff. FMFCD would review proposed site development plans to ensure they meet the Master Drainage Plan and stormwater design standards. The FMFCD would start by checking that all required documents are submitted, then conduct a technical review to confirm drainage capacity, proper integration with existing infrastructure, and compliance with NPDES water quality requirements. FMFCD would coordinate with local agencies, set conditions such as drainage fees or facility agreements, and grant approval once all requirements are satisfied. After construction, FMFCD will enforce post-development mitigation agreements. The project would have a **less than significant impact.**

Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional resources of polluted runoff; or impede or redirect flood flows?

The project is not located on or near any water bodies such that the project would impede or redirect flood flows. Additionally, the project is not located in any flood hazard zones. The project would have **no impact.**

4.10.4.3.d.Impact HYD-D:

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

No Impact

The project is not located in any flood hazard zones, tsunami zones, or seiche zones and would not risk release of pollutants due to inundation. The project would have **no impact.**

4.10.4.3.e.Impact HYD-E:

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

Less than Significant Impact

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

4.11 Noise and Groundborne Vibrations

4.11.1 Introduction

This section describes the existing environmental and regulatory setting of the project area and analyzes the potential impacts of the project related to noise and groundborne vibrations. This section also describes the criteria for determining the significance of impacts, approach to assessing impacts, and possible mitigation measures.

4.11.1.1 Noise Concepts and Terminology

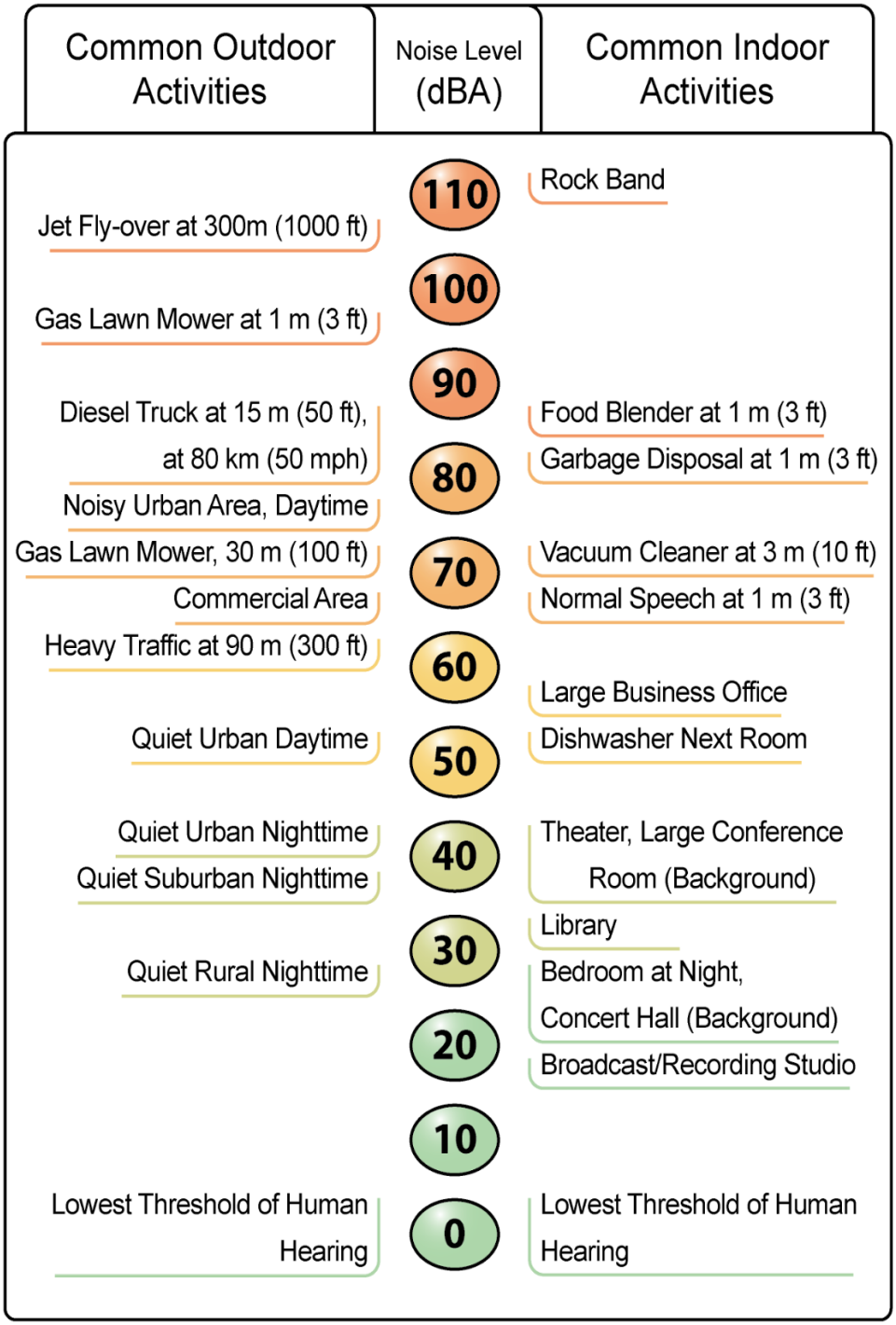
Acoustic Fundamentals. Noise is typically understood as sound that is excessively loud, unpleasant, or unexpected. Sound itself is a form of mechanical energy that travels as waves created by a disturbance or vibration. The characteristics of sound are commonly described by its amplitude and frequency.

Amplitude. Amplitude refers to the difference between normal atmospheric pressure and the maximum pressure reached by a sound wave. It is expressed in decibels (dB) using a logarithmic scale. For instance, a sound source producing 65 dB, such as a truck, does not double to 130 dB when joined by another 65-dB source; instead, their combined level becomes about 68 dB, because doubling the acoustic energy raises sound pressure by only 3 dB. The human ear interprets amplitude as loudness. Laboratory studies show that a 10-dB increase is typically perceived as a doubling of loudness, while a 3-dB change represents the smallest difference the average person can detect.

Frequency. Frequency describes how many times a sound wave fluctuates each second, measured in Hertz (Hz), where one Hz equals one cycle per second. Human hearing is not equally sensitive across all frequencies; people generally hear higher-pitched sounds better than very low or extremely high ones and sounds below 16 Hz or above 20,000 Hz are inaudible. To approximate how humans perceive different frequencies, environmental noise levels are often measured using “A-weighted decibels” (dBA). On this scale, human hearing typically ranges from about 10 dBA to roughly 140 dBA, and common community noise sources are usually expressed in dBA.

Addition of Decibels. Because decibels are measured on a logarithmic scale, sound levels cannot simply be added or subtracted using normal arithmetic. On this scale, doubling the acoustic energy increases the sound level by only 3 dB. This means that when two identical sound sources operate at the same time, the combined level will be 3 dB higher than that of a single source at the same distance. For example, if one car generates a noise level of 70 dB as it passes an observer, two cars passing together would not create 140 dB; instead, their combined level would be approximately 73 dB. Similarly, three equally loud sources operating at once would increase the total sound level by about 5 dB.

FIGURE 10: COMMON COMMUNITY NOISE SOURCES & NOISE LEVELS



Source: Caltrans 2018

Figure 10 displays a range of typical community noise levels and sources ranging from 0 to 110 decibels. Figure shows: quiet rural nighttime at 30 dB, quite urban nighttime at 40 dB, quiet urban daytime at 50 dB, heavy traffic at 90 m at 60 dB, gas lawn mower or commercial area at 70 dB, diesel trick at 15 m or noisy urban area (daytime) at 80 dB, gas lawn mower at 1 m at 100 dB, and a jet-flyover at 300 m or rock band at 110 dB.

4.11.1.2 Sound Propagation & Attenuation

Geometric Spreading. Sound produced by a small, concentrated source, known as a point source, spreads outward evenly in all directions, creating a spherical pattern. As this type of sound travels, its level decreases by roughly 6 dB each time the distance from the source is doubled. In contrast, highways act like line sources because they consist of many closely spaced point sources along a roadway. Line-source noise spreads outward in a cylindrical pattern, causing sound levels to drop by about 3 dB with each doubling of distance, although the exact reduction depends on the ground surface characteristics between the source and the receiver.

Atmospheric Effects. Receptors located downwind of a noise source may experience higher sound levels compared to conditions with no wind, while receptors positioned upwind may receive reduced noise. At greater distances, such as beyond 500 feet from a roadway, sound levels can also increase due to atmospheric temperature inversions, where temperature rises with height. Additional atmospheric factors, including air temperature, humidity, and turbulence, can further influence how sound travels and significantly affect noise levels.

Shielding by Natural or Human-Made Features. A large object or barrier positioned between a noise source and a receiver can significantly reduce the amount of sound that reaches the receiver. The amount of noise reduction provided by such shielding depends on the size of the barrier and the frequency characteristics of the sound. Natural landscape features such as hills or dense vegetation, as well as built structures like buildings and walls, can all help reduce noise levels. Walls are often installed specifically to block noise, and any barrier that interrupts the direct line of sight between a noise source and a receiver typically achieves at least 5 dB of noise reduction. Taller barriers can provide even greater reductions.

Noise reduction provided by buildings varies based on construction materials and methods. Standard building practices usually result in about 15 dBA of exterior-to-interior noise reduction for facades with open windows, and about 20 to 30 dBA when windows are closed. Modern construction required under current Title 24 energy standards incorporates increased insulation and mechanical ventilation systems, allowing windows on noise-affected sides of a building to remain closed. Under these conditions, exterior-to-interior noise reductions typically average around 25 dBA. Interior noise levels can be further lowered by the sound-absorbing properties of room finishes such as carpeting, draperies, and furniture.

Noise Descriptors. The decibel scale itself does not fully explain how people experience noise. The dominant frequencies within a sound play an important role in how the human ear perceives it. Although the physical intensity of sound is based on energy per unit area, the way people interpret loudness depends on how the ear responds.

Human hearing is limited both by the range of frequencies it can detect and by how it perceives variations in sound pressure within that range. Generally, people hear best in the range of 1,000 to 8,000 Hz and perceive sounds in this range more easily than sounds of equal amplitude at higher or lower frequencies. To better represent how the human ear responds, sound levels in different frequency bands are weighed according to human sensitivity. This weighting system is known as the A-weighted sound level and is expressed in dBA. The A-weighting curve mimics how an average young adult hears most everyday sounds. When people judge loudness or annoyance, their perceptions typically align well with A-weighted measurements. Other weighting systems have been created for specific technical applications, but they are rarely used in environmental noise assessments.

Environmental noise varies over time, and several metrics are used to describe time-averaged sound levels. Common descriptors in environmental noise studies include L_{eq}, L_{dn}, CNEL, and SEL. The energy-equivalent noise

level, L_{eq}, represents the average noise energy over a given time period. Many jurisdictions rely on 24-hour metrics to regulate noise. The day-night average noise level, L_{dn}, is a 24-hour average that includes a 10-dBA increase for nighttime hours from 10 p.m. to 7 a.m. to account for increased nighttime sensitivity. CNEL, the community noise equivalent level, is similar to L_{dn} but includes an additional 5-dBA increase for evening hours from 7 p.m. to 10 p.m.

Another commonly used descriptor is the single-event level, or SEL. This metric represents the total noise energy from a single event, normalized to a one-second duration. SEL is often used for intermittent noise sources such as aircraft flyovers or train pass-bys. Many typical community noise sources and their A-weighted levels are summarized in Table 21.

TABLE 21: COMMON ACOUSTICAL DESCRIPTORS

Descriptor	Definition
Energy Equivalent Noise Level	The energy mean (average) noise level. The instantaneous noise levels during a specific period of time in dBA are converted to relative energy values. From the sum of the relative energy values, an average energy value (in dBA) is calculated.
Minimum Noise Level (L_{min})	The minimum instantaneous noise level during a specific period of time.
Maximum Noise Level (L_{max})	The maximum instantaneous noise level during a specific period of time.
Day-Night Average Noise Level (DNL of L_{dn})	The DNL was first recommended by the U.S. EPA in 1974 as a "simple, uniform and appropriate way" of measuring long term environmental noise. DNL considers both the frequency of occurrence and duration of all noise events during a 24-hour period with a 10 dBA "penalty" for noise events that occur between the more noise-sensitive hours of 10:00 p.m. and 7:00 a.m. In other words, 10 dBA is "added" to noise events that occur in the nighttime hours to account for increases sensitivity to noise during these hours.
Community Noise Equivalent Level (CNEL)	The CNEL is similar to the L_{dn} described above, but with an additional 5 dBA "penalty" added to noise events that occur between the hours of 7:00 p.m. to 10:00 p.m. The calculated CNEL is typically approximately 0.5 dBA higher than the calculated L_{dn}.
Sound Exposure Level (SEL)	The level of sound accumulated over a given time interval or event. Technically, the sound exposure level is the level of the time-integrated mean square A-weighted sound for a stated time interval or event, with a reference time of one second.

4.11.1.3 Human Response to Noise

People's reactions to environmental noise vary widely, and the way noise is perceived is largely subjective. In community settings, noise is often described as a health concern not because it typically causes physical harm, but because it can interfere with general well-being, contribute to stress, and create annoyance. Noise can disrupt everyday activities such as speaking, recreation, and tasks that require concentration or coordination, and noise can disrupt activities essential to human health such as sleeping. Hearing loss can occur only at very high noise levels, yet community noise that disrupts activities or causes irritation becomes increasingly bothersome as the source grows louder. Decisions about how acceptable a noise source is, and its potential effects on public well-being, guide land-use policies intended to limit exposure to excessive community noise.

There is no perfect method for measuring how people will perceive noise or how annoyed they may become. This is mainly because individuals respond differently to noise based on their past experiences and tolerance levels. For this reason, an important part of understanding how someone will react to a new noise source is comparing it to the noise environment they are already accustomed to, sometimes referred to as the ambient noise level. In general, the greater the increase above the existing ambient noise, the less acceptable the new noise will seem.

When evaluating increases in A-weighted noise levels, the following guidelines help illustrate how people commonly respond:

- A 1 dB change cannot be detected by humans except under very controlled laboratory conditions.
- In normal settings, a 3 dB change is typically considered the smallest difference a person can perceive.
- An increase of at least 5 dB is usually required before most people notice a meaningful change in community noise, and a 5 dB rise is generally considered substantial.

A 10 dB increase is generally heard as roughly a doubling of perceived loudness and would almost always lead to a noticeable negative reaction in community response.

Effects of Noise on Human Activities. The degree to which environmental noise leads to greater annoyance, disruptions to activities, or sleep disturbances differs widely from person to person. This variation is influenced by factors such as how loud or sudden the noise is, whether the noise carries meaningful information such as an aircraft passing overhead, a crying child, or a fire alarm, as well as an individual's sleep patterns and overall sleep quality. People can also adapt to repeated noise events or increases in noise over time.

For land-use planning, environmental noise is often assessed based on the likelihood that noise events will heighten annoyance, interfere with sleep, or disrupt speech, daily activities, or learning. The ways in which noise affects human activities are described in more detail in the following sections.

Speech Communication. For most noise-sensitive land uses, an interior noise level of 45 dB L_{eq} is commonly used to ensure that speech can be understood clearly and without difficulty. With windows closed, indoor sound levels are typically about 20 dB lower than outdoor levels, which means an interior limit of 45 dB L_{eq} corresponds to an outdoor level of approximately 65 dBA L_{eq}. For normal outdoor conversation, an exterior noise level of 60 dBA L_{eq} generally allows clear speech at distances up to about 2 meters with roughly 95 percent sentence intelligibility. Based on this information, speech interference typically becomes a concern when steady outdoor noise reaches around 60 to 65 dBA. Inside buildings, an average hourly background noise level of about 45 dBA L_{eq} is usually recommended for noise-sensitive uses, such as schools (California Department of Transportation, 2011).

Learning. Noise can affect learning and overall cognitive performance in ways that are closely related to how it interferes with speech. Research has shown a strong connection between noise exposure and reduced reading ability in children. Studies also indicate that children's attention spans can be negatively affected by noisy environments. Adults experience impacts as well, with some research suggesting that complex tasks become more difficult to complete when noise levels are high. A challenge in evaluating these effects is determining which noise metric best reflects the impacts. For example, the average daily noise level, such as CNEL or L_{dn}, includes nighttime penalties and may not accurately represent noise conditions in schools since school activities primarily occur during daytime hours (California Department of Transportation, 2011).

To address classroom noise, several standards and recommended guidelines have been developed. For noise generated by transportation sources, the California Department of Transportation has established criteria that limit maximum interior noise levels in classrooms and other noise-sensitive interior spaces to 52 dBA Leq. In 2002, the American National Standards Institute (ANSI) introduced a classroom acoustics standard titled "Acoustical Performance Criteria, Design Requirements, and Guidelines for Schools" (ANSI S12.60-2002). For schools exposed to intermittent background noise sources such as airports or transportation corridors, the ANSI standards recommend that interior noise levels remain at or below 40 dBA L_{eq} during the loudest hour of the day. At present, following the ANSI recommendations is voluntary in most areas.

Annoyance and Sleep Disruption. When considering how noise may increase annoyance, interfere with activities, or disrupt sleep, land use compatibility assessments usually rely on cumulative noise exposure metrics such as CNEL or L_{dn}. One of the most thorough and widely accepted analyses of how noise levels relate to annoyance was developed by Theodore J. Schultz in 1978. His research supported the use of L_{dn} as an appropriate measure for environmental noise and demonstrated a relationship between long-term noise exposure and the percentage of people who reported being highly annoyed by transportation noise. When this relationship is shown graphically, it is known as the Schultz curve (California Department of Transportation, 2011).

The Schultz curve shows that about 13 percent of the population describes themselves as highly annoyed at a noise level of 65 dBA L_{dn}. It also shows that the percentage of people who report being highly annoyed increases gradually between 55 and 70 dBA L_{dn}. Because of this, a noise level of 65 dBA L_{dn} is often used as the dividing point between lower and higher annoyance levels in land use planning (California Department of Transportation, 2011)

If an average outdoor-to-indoor noise reduction of 20 dB is assumed, an exterior noise level of 65 dBA CNEL or L_{dn} corresponds to an indoor level of about 45 dBA CNEL or L_{dn}. An interior level of 45 dBA CNEL or L_{dn} is generally considered sufficient to prevent activity interference in most noise-sensitive spaces, including homes, and is also regarded as adequate to minimize sleep disturbance. Within California, the California Building Code identifies 45 dBA CNEL or L_{dn} as the highest acceptable interior noise level for residential uses other than detached single-family homes. This interior threshold is further supported by guidance from the State of California Office of Planning and Research's *General Plan Guidelines*, which recommend 45 dBA CNEL or L_{dn} as the maximum level that still allows normal residential activity.

Cumulative noise exposure remains the only noise metric supported by substantial research linking noise levels with community reaction, regulatory standards, and land use compatibility. However, cumulative metrics alone may not fully reflect the impacts of intermittent noise sources such as aircraft flyovers, passing trains, or construction noise. Because the public often has difficulty understanding how intermittent noise contributes to total noise exposure, it is sometimes helpful to supplement cumulative metrics with additional descriptors like L_{eq} or L_{max}. This approach can improve public understanding of how different metrics relate to the actual experience and magnitude of intermittent noise events (California Department of Transportation, 2011).

4.11.2 Environmental Setting

4.11.2.1 Noise Sensitive Land Uses

Noise-sensitive land uses generally include places where elevated noise levels could pose health risks or where quiet conditions are essential to the intended function of the space. Residential dwellings are typically the most important of these because people can be exposed to both indoor and outdoor noise for long periods. Other areas such as parks, historic sites, cemeteries, and recreational spaces are also considered sensitive to increases in outdoor noise. In addition, schools, churches, hotels, libraries, and other facilities where low indoor noise levels are necessary for their use are classified as noise-sensitive.

The project itself is an elementary school and is a sensitive land use. Additionally, the project is immediately adjacent to residential properties to the east, and the school is located approximately 50 feet away from residential properties to the north across E. Kaviland Ave. and south across S. Cedar Avenue. There is a church located 50 feet north of the project as well.

4.11.2.2 Ambient Noise Environment

Existing ambient noise conditions at the project site include the noise from the existing school site (e.g., noise of children playing during recess), existing landscape and operational noises from lawn mowers, weed whackers, and leaf blowers, and existing operational noises from mechanical equipment such as HVAC systems. The nearby roads are another ambient noise sources, including Cedar Avenue immediately to the west which is designated as an Arterial road by the City of Fresno, and Jensen Avenue Bypass 400 feet to the south which is designated as a Super Arterial road. Additional noise sources include the industrial land uses approximately 500 feet to the south and 800 feet to the east.

4.11.3 Regulatory Framework

4.11.3.1 Federal Laws, Regulations, and Policies

No federal laws, regulations, or policies related to noise apply to the project.

4.11.3.2 State Laws, Regulations, and Policies

The State of California regulates vehicular and freeway noise affecting classrooms, sets standards for sound transmission and occupational noise control, and identifies noise insulation standards and airport noise/land-use compatibility criteria.

4.11.3.2.a. California General Plan Guidelines

The *State of California General Plan Guidelines*, published by the Governor's Office of Planning and Research (Governor's Office of Planning and Research, 2017), offer guidance on determining whether projects are acceptable within specific CNEL or L_{dn} noise contours. These guidelines also identify adjustment factors that can help communities establish noise acceptability standards that reflect local noise-control goals, sensitivity to noise, and the community's view of the importance of controlling noise pollution.

For school land uses, the *State of California General Plan Guidelines* identify an exterior noise level of up to 70 dBA CNEL or L_{dn} as "normally acceptable." Schools are considered "conditionally acceptable" in environments of 60 to

70 dBA CNEL or L_{dn} and "normally unacceptable" in environments of 70 to 80 dBA CNEL or L_{dn}. Noise environments above 80 dBA CNEL or L_{dn} are considered "clearly unacceptable." If a minimum outdoor-to-indoor noise reduction of 20 dB is assumed, an exterior noise level of 65 dBA CNEL or L_{dn} would achieve an interior noise level of 45 dBA CNEL or Ldn, which is considered normally acceptable.

4.11.3.3 Local Laws, Regulations, and Policies

4.11.3.3.a. City of Fresno

Although the District is not subject to direct enforcement of the City of Fresno Noise Ordinance, the ordinance's exterior noise standards are used in this EIR as significance thresholds for evaluating operational noise impacts, consistent with Appendix G of the CEQA Guidelines and local CEQA practice.

Construction

The City of Fresno's Code of Ordinance, Chapter 10, Article 1 – Noise Regulations, states the noise level requirements throughout the City (City of Fresno, 2026). Specifically, Section 10-109 – Exceptions states that the following exception to the city-wide noise ordinance:

"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"

Operation

Operational noise within the City of Fresno is also regulated under Chapter 10, Article 1- Noise Regulations of the Fresno Municipal Code, which establishes standards for evaluating and limiting noise impacts at receiving land uses. The Noise Ordinance defines ambient noise as the existing background sound environment at a given location, measured as a 15-minute average without inclusion of the offending noise source. For enforcement and compliance purposes, if the measured ambient noise level is lower than the applicable ordinance standard, the ordinance standard is used as the ambient noise baseline.

The ordinance establishes maximum allowable exterior noise levels by land use classification and time of day. These standards apply to ongoing operational noise sources and are intended to protect noise-sensitive land uses, including residential areas and schools, from excessive or disruptive noise exposure. Applicable standards include a daytime limit of 60 decibels A-weighted (dBA) for residential areas, with lower allowable levels during evening and nighttime hours. Higher limits apply to commercial and industrial zones, reflecting their greater tolerance for operational noise.

Operational activities are considered compliant where noise generated by a project does not exceed the applicable exterior noise limits at receptor locations during the corresponding time periods. In the context of CEQA analysis, these ordinance standards are commonly used as significance thresholds to evaluate whether a project's long-term operational noise would expose nearby sensitive receptors to excessive noise levels or conflict with local noise control policies.

Projects that do not introduce new noise-generating uses or substantially increase operational intensity relative to existing conditions are generally considered consistent with City of Fresno operational noise policies, provided all ongoing activities comply with the established decibel limits (City of Fresno, 2026).

Groundborne Vibration

Vibration is similar to noise in that it involves a source, a path through which energy travels, and a receiver. Although vibration is related to noise, the two differ in how they are transmitted. Noise is generally described as pressure waves moving through air, while vibration typically results from the excitation of a structure or surface. Like noise, vibration is characterized by both amplitude and frequency. How a person experiences vibration depends on individual sensitivity, as well as on the magnitude and frequency of the source and the response characteristics of the structure being affected. Vibration can be quantified using measurements of acceleration, velocity, or displacement. When vibration is expressed in terms of velocity, it is reported as peak particle velocity, or PPV, measured in inches per second. See Table 22 for typical vibration levels for construction equipment.

TABLE 22: VIBRATION SOURCE LEVELS FOR CONSTRUCTION EQUIPMENT

Equipment	Approximate PPV at 25 ft (in/sec)
Pile driver (impact)	0.644 (1.158 upper range)
Pile driver (sonic/vibratory)	0.170 (0.734 upper range)
Clam shovel drop	0.202
Vibratory Roller	0.210
Caisson drilling	0.089
Large bulldozer	0.089
Hoe Ram	0.089
Loaded trucks	0.076
Jackhammer	0.035
Small bulldozer	0.003

(Federal Transit Administration, 2018)

There are no federal, state, or local regulations that establish enforceable standards for groundborne vibration. However, Caltrans has developed vibration criteria that address the potential for structural damage and human annoyance. These recommended criteria are used to evaluate continuous vibration sources, such as vehicle traffic and most construction activities, and are summarized in Table 23. The damage thresholds are based on the motion measured at building foundations and do not account for any additional amplification caused by structural components of the building.

As shown in Table 23, the vibration level at which continuous activities may pose a risk to typical structures is 0.3 inches per second PPV for older residential buildings and 0.5 inches per second PPV for newer construction. In terms of human perception, vibration becomes noticeable at approximately 0.04 inches per second PPV for continuous sources, while levels around 0.2 inches per second PPV are generally considered potentially annoying for occupants of buildings.

TABLE 23: SUMMARY OF GROUNDBORNE VIBRATION LEVELS AND POTENTIAL EFFECTS

Vibration Level (in/sec ppv)	Human Reaction	Effects on Buildings
0.006 - 0.019	Threshold of perception; possibility of intrusion	Vibrations unlikely to cause damage of any type
0.08	Vibration readily perceptible	Recommended upper level of vibration to which ruins and ancient monuments should be subjected.
0.10	Level at which continuous vibrations begin to annoy people.	Virtually no risk of "architectural" damage to normal buildings.
0.20	Vibrations annoy people in buildings (this agrees with the levels established for people standing on bridges and subject to relatively short periods of vibrations).	Threshold at which there is a risk of "architectural" damage to fragile buildings.
0.3 - 0.6	Vibrations become distinctly perceptible at 0.04 in/sec ppv and considered unpleasant by people subjected to continues vibrations and unacceptable to some people walking bridges.	Potential risk of "architectural" damage may occur at levels above 0.3 in/sec ppv for older residential structures and above 0.5 in/sec ppv for newer structures.
The vibration levels are based on peak particle velocity in the vertical direction for continuous vibration sources, which includes most construction activities. *Source:* (California Department of Transportation, 2013)		

Additionally, the Federal Transit Administration has developed the Transit Noise and Vibration Impact Assessment Manual to provide guidance on assessing vibration impacts associated with transit projects, though the manual provides information regarding construction vibration impacts (Federal Transit Administration, 2018). In particular, the manual provides the following equation to determine the PPV of construction equipment:

$$PPV_{equip} = PPV_{ref} \times \left(\frac{25}{D}\right)^{1.5}$$

PPV_{equip} refers to the peak particle velocity produced by construction equipment calculated using the equation, where PPV_{ref} refers to the reference PPV values provided in Table 22 and "D" refers to the distance between the equipment and the structure. The PPV affecting a structure increases the closer construction equipment is used near a structure. The Transit Noise and Vibration Impact Assessment Manual also provides mitigation measures to reduce groundborne vibration impacts to buildings.

4.11.3.4 Groundborne Vibration Environmental Setting

The existing project site experiences minimal groundborne vibration under current conditions. Sources of vibration are limited to normal operation of on-site mechanical, plumbing, and building systems, which typically generate

low-level vibrations not perceptible beyond immediate building interiors. There are no nearby rail lines, major roadway segments, or industrial vibration sources that contribute to notable ambient groundborne vibration levels at the site.

The project site includes buildings constructed between approximately 1945 and 1970, four of which are considered historical resources. Older structures, including historic buildings, are generally more susceptible to architectural damage or nuisance effects from groundborne vibration due to construction methods, materials, and age-related deterioration. As a result, vibration-related impacts to historical resources can represent a sensitive issue under existing conditions.

However, the proposed project would involve reconstruction of the campus in multiple phases, with portions of the site remaining occupied by students and staff during construction. Not all buildings would be demolished during the proposed project's construction, and construction would occur in phases. As a result, students and school staff in occupied on-site facilities would represent sensitive groundborne vibration receptors during construction activities. Additionally, historic and older buildings would remain in place during demolition and reconstruction phases; therefore, vibration-related impacts to historic resources have the potential to occur. Adjacent off-site residential and institutional structures would also represent potential groundborne vibration receptors during project implementation.

4.11.4 Impact Analysis

4.11.4.1 Significance Criteria

The thresholds for determining the significance of impacts for noise and groundborne vibration are based on the environmental checklist in Appendix G of the CEQA Guidelines, as amended. The project would have a significant noise or vibration impact if it would:

- Result in exposure of people to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies;
- Result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels, particularly where construction or operational activities would affect sensitive receptors such as students, school staff, nearby residents, or structures vulnerable to vibration damage;
- Result in a substantial permanent increase in ambient noise or groundborne vibration levels in the project vicinity above levels existing without the project;
- Result in a substantial temporary or periodic increase in ambient noise or groundborne vibration levels, including construction-related vibration that could interfere with educational activities or cause annoyance or discomfort to nearby or on-site sensitive receptors;
- For a project location 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, expose people residing or working in the study area to excessive noise levels; or
- For a project within the vicinity of a private airstrip, expose people residing or working in the study area to excessive noise levels.

Groundborne vibration impacts are typically evaluated qualitatively based on the type, duration, and proximity of vibration-generating activities to sensitive receptors, as well as the presence of applicable regulatory guidance or industry-accepted criteria for human annoyance. This section also analyzes vibrational impacts to older and historical buildings.

4.11.4.2 Methodology

The analysis of the project's potential noise and groundborne vibration impacts was based on a comparison of project-related noise and vibration levels to existing ambient conditions. In determining the extent and implications of potential impacts, consideration was given to the type, intensity, and location of noise- and vibration-generating construction activities; the nature of construction equipment to be used; construction hours; and the duration and phasing of construction. The analysis also considered operational noise associated with the proposed use of the project site, as well as the potential for groundborne vibration effects on nearby and on-site sensitive receptors during phased construction.

4.11.4.3 Impacts and Mitigation Measures

4.11.4.3.a.Impact NOISE-A:

Would the project result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Less than Significant Impact with Mitigation Incorporated

Construction

Construction activities associated with the project would result in temporary increases in noise levels from operation of heavy equipment and tools during active construction periods. These noise sources would be intermittent and would vary by construction phase and equipment type. Table 24 summarizes typical noise levels associated with commonly used construction equipment.

TABLE 24: TYPICAL CONSTRUCTION EQUIPMENT NOISE LEVELS

Equipment	Typical Noise Level (dBA) at 50 ft from source	
	L_{max}	L_{eq}
Compactor, Concrete Vibratory Mixer	80	73
Backhoe/Front-End Loader, Air Compressor	80	76
Generator	82	79
Crane, Mobile	85	77
Jack hammer, Roller	85	78
Dozer, Excavator, Grader, Concrete Mixer Truck	85	81
Pavers, Pneumatic Tools	85	82
Source: (United States Department of Transportation, Federal Transit Administration, 2006)		

Most off-site noise-sensitive receptors, such as nearby residential buildings, are located more than 50 feet from active construction areas. However, construction would occur near existing school buildings, and the buildings may

be occupied during construction. And, some offsite sensitive receptors, such as the residential buildings along the project site's east perimeter may be within 50 feet of active construction.

Construction equipment expected to be used includes graders, excavators, and jackhammers, which are among the higher-noise construction equipment types. Based on published reference noise levels for this equipment, maximum exterior noise levels at a distance of 50 feet are conservatively estimated to be approximately 85 dBA for outdoor receptors during peak construction activity. Indoor noise levels would be reduced by building wall materials, windows, and doors. A conservative interior noise attenuation of approximately 15 dBA is assumed for occupied buildings, yielding an estimated maximum indoor noise level of approximately 70 dBA at sensitive indoor receptors.

Reconstruction of the school campus would occur while school is in session and would involve demolition, construction, and use of construction equipment that would generate elevated noise levels. These temporary noise levels could intermittently interfere with classroom instruction, student concentration, and faculty activities during periods of high-noise construction. In addition, residential land uses immediately east of the project site could be exposed to elevated construction noise levels during daytime hours. Although construction noise is exempt from City noise standards when conducted during allowable hours, the proximity of sensitive educational uses and nearby residences increases the potential for disturbance.

Construction noise (and vibrations) associated with the project could result in short-term disruption of normal school operations and temporary annoyance to nearby residents. This is a **significant impact**.

The District or its agent shall the implement the following construction noise and vibration control measures to reduce impacts.

MM-NOISE-1: Construction Noise and Vibration Control and Compliance

1. **Noise Ordinance Compliance**
   The Designer Build Entity shall comply with all applicable local, city, county, state, and federal laws, ordinances, and regulations governing construction noise and vibrations at all times. Construction activities shall be limited to allowable hours as specified by the City of Fresno noise ordinances.

2. **Construction Scheduling During School Hours**
   If school is in session during any phase of construction and, in the District's reasonable judgment, construction noise disrupts or interferes with classroom instruction or normal school operations, the Design-Build Entity shall, at the District's request, reschedule high-noise and vibration activities to occur outside normal instructional hours or implement alternative construction methods.

3. **Control of Radios and Nonessential Noise Sources**
   The use of radios, personal music devices, or other amplified sound sources at the construction site shall be controlled to ensure that sound is not audible beyond the immediate construction area. The District reserves the right to prohibit such devices at the site, except for communication radios necessary for construction safety and coordination.

4. **Equipment Mufflers and Maintenance**
   All construction equipment, including impact tools, shall be equipped with properly functioning intake and exhaust mufflers. Equipment shall be maintained in good working order to minimize excessive noise, vibration, and rattling.

5. **Coordination and Response to Noise and Vibration Complaints**
   The Design Build Entity shall cooperate with the District to minimize or temporarily suspend the use of particularly noisy or vibratory equipment if such equipment becomes objectionable due to its duration, intensity, or timing. Reasonable adjustments shall be made to construction sequence or methods to reduce disruption.

6. **Advance Notice of High-Noise and Vibratory Activities**
   The Design Build Entity shall provide the District with written notice at least 48 hours in advance of particularly noisy or vibratory construction activities, including but not limited to pneumatic demolition, concrete saw cutting, grading and compaction near buildings, or other high-impact operations. The District may coordinate notifications to staff, students, and nearby residents as appropriate.

7. **Construction Equipment and Material Siting**
   All operating diesel generators shall be located a minimum of 20 feet from any on-site occupied building and from adjacent property lines to the extent feasible. Where site constraints prevent full compliance, generators shall be placed at the maximum feasible distance and oriented to direct noise away from occupied buildings and neighboring properties.

   Construction equipment, staging areas, and construction materials that require the use or movement of powered equipment for loading, unloading, or repositioning shall not be stored or staged within 20 feet of on-site occupied buildings or adjacent property lines, to the extent feasible. Equipment and material storage locations shall be sited to minimize noise exposure to students, staff, and nearby residential receptors.

Through the implementation of Mitigation Measure NOISE-1, temporary and intermittent noise impacts from construction activities would be reduced to a less than **significant with mitigation incorporated.**

Operational
The operational noise sources at the project site are not expected to change as the project will continue to be an elementary school campus with the same capacity. This impact would be **less than significant.**

Significance After Mitigation
As discussed above, with the implementation of NOISE-1, the project's impact in regard to noise impacts and compliance with applicable noise thresholds would result in a **less than significant impact with mitigation incorporated.**

4.11.4.3.b.Impact NOISE-B:

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

Less than Significant with Mitigation Incorporated

Construction
Construction activities associated with the project would include the use of various off-road equipment such as bulldozers, haul trucks, jackhammers, concrete mixers, etc. The use of major groundborne vibration-generating construction equipment, such as pile drivers, would not be used for the project.

Construction activity that may produce groundborne vibration include grading, soil compaction, asphalt concrete pavement construction, and sidewalk construction. Specifically, portions of the project area would be graded, as

close as 9 feet to potentially occupied buildings and 9 feet from the nearest historical building, all of which are owned by the District. The project includes the demolition and subsequent grading of a portion of the project campus, as well as concrete/asphalt hardscape construction, which involves compacting underlying soil with vibratory rollers.

Groundborne vibration levels associated with typical construction equipment at 9, 25, 30, and 80 feet are summarized in **Error! Reference source not found.**. As shown in **Error! Reference source not found.**, vibration pr oduced by construction activities would be approximately 0.210 inches per second peak particle velocity, or lower, at 25 feet. Predicted vibration levels at the nearest existing on-campus structures may exceed commonly applied thresholds for either architectural damage to newer structures or human annoyance, which are generally identified as 0.5 and 0.2 inches per second peak particle velocity, respectively. Architectural damage may include damage to exterior fascia or interior walls, though the damage would not be considered structural in nature.

TABLE 25: ESTIMATE VIBRATION LEVELS FOR CONSTRUCTION EQUIPMENT

Equipment	Peak Particle Velocity at 9 Feet (in/sec)	Peak Particle Velocity at 25 Feet (in/sec)	Peak Particle Velocity at 30 Feet(in/sec)	Peak Particle Velocity at 80 Feet (in/sec)
Vibratory Roller	0.970	0.210	0.160	0.040
Large Bulldozer	0.410	0.089	0.070	0.020
Loaded Truck	0.350	0.076	0.060	0.010
Jackhammer	0.160	0.035	0.030	0.010
Small Bulldozer	0.014	0.003	0.000	0.000
Sources: (United States Department of Transportation, Federal Transit Administration, 2006), (California Department of Transportation, 2013)				

Table 26 was prepared to better summarize the potential impacts regarding construction-related vibration on nearby buildings and their occupants. The information in Table 26 was gathered from Table 22, Table 23, Table 25, and the equation described previously in Section 4.11.3.4. The distances in the "Distances from Structure/Occupants" column are the distances before potentially significant impacts may be experienced by buildings or their occupants. For example, at 15 feet, vibratory rollers would have a less than significant impacts to unoccupied newer structures. At the same time, those distances do not adequately reduce vibration for other types of impacts. At 15 feet, vibratory rollers have potentially significant impacts to building occupants or historical structures.

TABLE 26: DISTANCES BEFORE POTENTIALLY SIGNIFICANT IMPACTS TO OCCUPANTS OR BUILDINGS

Distance from Structure/Occupants (feet)	Construction Equipment	PPV of Construction Equipment at	Impact to Occupants Threshold = 0.20 PPV	Impact to Historical Structures	Impact to Newer and Proposed Structures

		given Distance (in./sec.)		Threshold = 0.20 PPV	Threshold = 0.50 PPV
8	Vibratory Roller	1.160	PS	PS	PS
8	Large Bulldozer	0.492	PS	PS	*LTS*
15	Vibratory Roller	0.452	PS	PS	*LTS*
15	Large Bulldozer	0.191	*LTS*	*LTS*	*LTS*
26	Vibratory Roller	0.198	*LTS*	*LTS*	*LTS*
26	Large Bulldozer	0.084	*LTS*	*LTS*	*LTS*
Abbreviation definitions: PS = *Potential Significant Impact; LTS = Less Than Significant Impact*					

Human Annoyance

Table 23 describes the vibration levels and their perception and effects on human beings, and a threshold for vibration that causes human annoyance is 0.10 PPV. As discussed previously, construction activity is expected to produce groundborne vibration that may impact occupants of nearby buildings. The campus would be constructed in phases, so some buildings may be occupied during the proposed project's construction. As shown in Table 22, construction equipment used during demolition and grading such as vibratory rollers produce vibration of 0.210 PPV at 25 feet. Demolition and grading would occur closer than 25 feet to nearby buildings and their occupants, indicating that the threshold for human annoyance would be exceeded during those phases of construction. These activities would occur during brief periods and therefore not expected to create long-term impacts. However, implementing MM-NOISE-1: Construction Noise and Vibration Control and Compliance would further reduce the impact of groundborne vibration on building occupants to a **less than significant.**

Architectural Damage

As discussed in Section 4.2 *Historic Architectural Resources*, the project site consists of four (4) historic buildings, and these buildings may sustain architectural damage as a result of groundborne vibration. One (1) historic building would be demolished and therefore is not included in this impact analysis. The three (3) remaining buildings (C, D, and J) are located at the southern section of the campus and may be impacted by nearby grading, soil compaction, and concrete/asphalt construction activities. Specifically, a portion of the campus would be demolished and then subsequently graded, where grading is expected to occur approximately 80 feet north of the nearest historical building. Additionally, concrete sidewalk and asphalt would be constructed approximately 9 feet south of the nearest historical building. Concrete and asphalt construction may involve vibratory rollers and site demolition/grading may involve large vehicles such as large bulldozers.

Considering the information in Table 26, architectural damage is not expected due to demolition and grading operations because those activities would occur at approximately 80 feet north of the historical buildings. However, concrete and asphalt work required for the proposed bus drop off lane may result in architectural

damage to nearby historical buildings, of Classroom Buildings C and D and Building J (Library). Table 23 and Table 26 show that the threshold for architectural damage to fragile buildings is 0.20 PPV, so the closest distance that a vibratory roller can operate without causing architectural damage using this threshold is 26 feet where a roller's groundborne vibration is approximately 0.198 PPV. The closest that a large bulldozer can operate near a historical building without causing architectural damage using the aforementioned threshold is 15 feet where the dozer's groundborne vibration is 0.191 PPV. These activities have the potential to cause architectural damage to historical buildings. This is a significant impact. The District or its agent shall implement following mitigation measure to reduce those impacts:

MM-NOISE-2: Restrict High Vibratory Equipment Near Buildings
The following restrictions to high vibratory equipment shall be implemented during construction

1. **Prohibit Use of Vibratory Rollers within 26 Feet of Historical Buildings**. Vibratory Rollers shall not be used within 26 feet of historical buildings to be preserved (Buildings C, D, and J). Alternative construction equipment shall be used near these buildings. Static rollers or other low vibratory methods shall be used instead of vibratory rollers for compaction/paving activities within 26 feet of Buildings C, D, and J.

2. **Prohibit Use of Vibratory Rollers within 15 Feet of New Buildings**. Vibratory Rollers shall not be used within 15 feet of new completed buildings constructed as a part of the project. Alternative construction equipment shall be used in these areas. Static rollers or other low vibratory methods shall be used instead of vibratory rollers for compaction/paving activities within 15 feet of new completed buildings.

3. **Prohibit Use of Large Bulldozers within 15 Feet of Historical Buildings**. Large bulldozers shall not be used within 15 feet of historical buildings to be preserved (Building C, D, and J). Small bulldozers shall be used instead for grading, demolition, or miscellaneous activities within 15 feet of Buildings C, D, and J.

Operational

The proposed project would continue to operate as an elementary school with no significant vibratory sources. Therefore, this impact would be **less than significant**.

Significance After Mitigation Measures

As discussed, the groundborne vibration produced during the proposed project's construction has the potential to create a nuisance to students, staff, and visitors occupying buildings, and the potential to cause architectural damage. Though the construction is a temporary condition, and the specific vibration-prone phases are relatively brief, the following measures would be implemented to mitigate the impact of groundborne vibration during construction: MM-NOISE-1: Construction Noise Control and Compliance and MM-NOISE-2: Restrict High Vibratory Equipment Near Buildings.

Therefore, the proposed project's impact as a result of groundborne vibration would be **less than significant with mitigation incorporated.**

4.11.4.3.c. Impact NOISE-C:

For a project located within a private airstrip or airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

No Impact

The project is not within the vicinity of a private airstrip or airport land use plan, nor is the project site within 2 miles of a public airport. The project would have **no impact**.

4.12 Transportation

4.12.1 Introduction

This section describes the existing environmental and regulatory setting of the project area and analyzes the potential impacts related to transportation. This section also describes the criteria for determining the significance of impacts, approach to assessing impacts, and possible mitigation measures.

In its Notice of Preparation (NOP) comment letter dated April 20, 2026, the City of Fresno requested that the EIR evaluate parking supply, the potential effects of modified site circulation and student drop-off/pick-up patterns on the surrounding neighborhood, and Safe Routes to School (SRTS) considerations. In response to these comments, parking supply and circulation are evaluated in this section. In addition, a Physical SRTS Analysis has been prepared and included as Appendix G. The analysis evaluates existing transportation conditions and project-related impacts with a focus on SRTS considerations.

4.12.2 Environmental Setting

4.12.2.1 Existing Transportation Conditions

The Physical SRTS Analysis evaluates the existing transportation network within the Calwa Elementary School attendance boundary, with a focus on pedestrian and bicycle infrastructure, roadway characteristics, traffic control devices, and other features affecting transportation safety for students traveling to and from school. The analysis primarily focuses on the residential neighborhoods that generate student travel to the campus including the routes and transportation conditions affecting students' access to the campus. The project site is located at the northeast corner of Cedar Avenue and Jensen Avenue within the Calwa community of south-central Fresno. Although the Calwa community is predominantly residential, it is surrounded by industrial, warehouse, rail-related, and other transportation-oriented land uses. As a result, several major roadways serving the area experience substantial commercial vehicle and freight-truck activity.

The transportation network surrounding the project consists of a combination of local residential streets, arterial roadways, and regional transportation corridors. Cedar Avenue, which fronts the western boundary of the campus, is designated as an arterial roadway and serves as the primary north-south route for students accessing the school. Jensen Avenue forms the southern frontage of the campus and runs parallel to the nearby Jensen Avenue Bypass, a major east-west super-arterial corridor, located approximately 400 feet south of the school that serves regional traffic traveling through the area south (City of Fresno, 2022). The campus is bordered by Kaviland Avenue to the north and residential properties fronting Rowell Avenue to the east.

Public transit service is provided by Fresno Area Express (FAX) Route 38, which includes a bus stop at the southwest corner of the project site and operates along Cedar Avenue. Route 38 is identified by Fresno Council of Governments as a high-frequency transit route and contributes to the area's designation as a High-Quality Transit Area (Fresno COG, 2025). Pedestrian access to the campus is supported by sidewalks along surrounding roadways and a pedestrian-activated, signalized mid-block crossing of Cedar Avenue located between Jensen Avenue and Kaviland Avenue. The crossing provides a direct connection between neighborhoods west of Cedar Avenue and the school campus.

Pedestrian connectivity within the surrounding residential neighborhoods is generally good, with sidewalks present along most school travel routes. Bicycle connectivity is more limited, although Cedar Avenue includes an enhanced

Class III bicycle route installed as part of the Cedar Avenue Complete Streets Project. In 2025, the City of Fresno completed improvements along Cedar Avenue between Church Avenue and Jensen Avenue Bypass. The improvement included a roadway reconfiguration from four travel lanes to two travel lanes with a center two-way left-turn lane, installation of high-visibility crosswalks, and bicycle facility enhancements. These improvements improved pedestrian and bicycle access along one of the primary routes serving Calwa Elementary School.

Notwithstanding these improvements, major transportation corridors, particularly Cedar Avenue and Jensen Avenue Bypass, continue to present challenges for pedestrians and bicyclists because of their roadway widths, traffic volumes, operating speeds, and freight-truck activity. Additional transportation safety concerns identified in the study area include limited east-west bicycle connectivity, localized sidewalk gaps within portions of Fresno County jurisdiction, and several neighborhood intersections with limited traffic-control or traffic-calming features. Overall, the surrounding transportation network provides direct and connected routes between residential neighborhoods and the school and supports pedestrian and bicycle access throughout most of the attendance boundary.

4.12.3 Regulatory Setting

4.12.3.1 Federal Laws, Regulations, and Policies

No federal laws, regulations, or policies related to transportation apply to the project.

4.12.3.2 State Laws, Regulations, and Policies

4.12.3.2.a. California Vehicle Code

The California Vehicle Code establishes regulations governing the operation of vehicles, commercial vehicle licensing, oversized load permits, vehicle weight restrictions, and interactions between motorists, pedestrians, and bicyclists.

Relevant provisions include requirements for commercial driver's licenses, permits for oversized loads, and vehicle weight limitations applicable to construction vehicles and hauling activities. The Vehicle Code also establishes pedestrian right-of-way requirements within marked and unmarked crosswalks and requires motorists to exercise due care to avoid collisions with pedestrians. In school areas, California law establishes a standard school-zone speed limit of 25 miles per hour when children are present and recognizes bicyclists as lawful roadway users entitled to safe accommodation within the public right-of-way.

The project would be required to comply with all applicable Vehicle Code requirements during both construction and operation.

4.12.3.2.b. California Streets and Highways Code

The California Streets and Highways Code govern the use of state, local, and county roadways and establishes requirements for encroachment permits and activities occurring within public rights-of-way.

Applicable provisions require encroachment permits for work occurring within roadways, sidewalks, and other transportation facilities under the jurisdiction of Caltrans, Fresno County, or the City of Fresno. Any improvements proposed within public rights-of-way would be subject to review and approval by the applicable transportation agency.

4.12.3.2.c. California Manual on Uniform Traffic Control Devices, Part 6

The California Manual on Uniform Traffic Control Devices (CA MUTCD) establishes statewide standards for traffic signs, pavement markings, signals, pedestrian crossings, temporary traffic control, and bicycle facilities.

Part 6 of the CA MUTCD requires preparation and implementation of temporary traffic control plans whenever roadway construction activities affect vehicle, bicycle, transit, or pedestrian travel. Construction-related traffic control associated with the project would be required to comply with applicable CA MUTCD requirements.

4.12.3.2.d. State Active Transportation and Complete Streets Policies

California has adopted multiple policies intended to improve transportation safety and support walking and bicycling. These include Caltrans' Complete Streets policies, the California Complete Streets Act of 2008, the Active Transportation Program (ATP), and the State Bicycle and Pedestrian Plan.

Collectively, these policies encourage transportation systems that safely accommodate pedestrians, bicyclists, transit users, and motorists and provide funding opportunities for transportation improvements that enhance safety, connectivity, accessibility, and public health. California also supports Safe Routes to School (SRTS) initiatives that improve pedestrian and bicycle access to schools through infrastructure improvements and related safety enhancements.

4.12.3.3 County of Fresno Laws, Regulations, and Policies

4.12.3.3.a. Fresno Council of Governments Regional Transportation Plan and Sustainable Communities Strategy

The Fresno Council of Governments (Fresno COG) serves as the region's transportation planning agency and prepares the Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS). The RTP/SCS establishes long-range policies and planned transportation investments intended to improve mobility, connectivity, and accessibility throughout Fresno County.

Although the RTP/SCS does not include policies specific to Calwa Elementary School, it provides the regional planning framework that guides transportation improvements and funding priorities throughout the region (Fresno Council of Governments, 2022).

4.12.3.3.b. Fresno County Safe Streets and Roads for All (SS4A) Action Plan

Fresno County is currently preparing a Safe Streets and Roads for All (SS4A) Action Plan. The plan utilizes collision data, community input, and roadway analysis to identify high-risk transportation locations and prioritize safety improvements intended to reduce fatalities and serious injuries. The planning effort includes consideration of pedestrian and bicycle safety concerns, school travel routes, and speed management strategies.

4.12.3.3.c. Fresno County Long-Range Transit Plan

The Fresno County Long-Range Transit Plan(LRTP) provides a framework for future transit investments through 2050, including planned improvements to transit service throughout Fresno County. The plan identifies potential transit enhancements within major transportation corridors, including Cedar Avenue (Fresno Council of Governments, 2019).

4.12.3.3.d. Fresno COG Measure C Safe Routes to School Program

Fresno COG administers Safe Routes to School programs through Measure C transportation sales tax funding. These programs provide funding for infrastructure improvements near schools intended to improve pedestrian and bicycle safety, reduce conflicts with vehicle traffic, and increase access to active transportation for students.

4.12.3.4 City of Fresno Laws, Regulations, and Policies

4.12.3.4.a. City of Fresno General Plan – Mobility and Transportation

The City of Fresno General Plan establishes transportation policies and roadway classifications through its Mobility and Transportation Element. Roadways are classified as expressways, super arterials, arterials, collector streets, and local streets. These classifications influence roadway design, operational characteristics, and multimodal transportation planning.

4.12.3.4.b. City of Fresno Active Transportation Plan

The City of Fresno Active Transportation Plan (ATP) provides the City's long-term vision for improving pedestrian and bicycle infrastructure. The plan identifies existing and planned bicycle facilities, sidewalk improvements, and pedestrian safety projects intended to improve connectivity and accessibility throughout the city.

The ATP supports implementation of bicycle facilities, crosswalk improvements, and other infrastructure enhancements that improve safety for pedestrians and bicyclists (City of Fresno, 2016)

4.12.3.4.c. Fresno-Clovis Metropolitan Area Short Range Transit Plan

Prepared by Fresno Area Express (FAX), the Short-Range Transit Plan (SRTP) provides a five-year framework for transit operations and service planning within the Fresno-Clovis metropolitan area. The plan guides future transit investments and service enhancements throughout the region (Fresno Area Express, 2025).

4.12.3.4.d. City of Fresno Vision Zero Action Plan

The City of Fresno adopted a Vision Zero Action Plan in 2026. The plan establishes a data-driven framework intended to eliminate traffic fatalities and serious injuries through engineering improvements, speed management, education, and other transportation safety measures.

The Vision Zero framework prioritizes improvements for vulnerable roadway users, including pedestrians and bicyclists, and is particularly relevant to transportation safety conditions near schools **Invalid source specified.**.

4.12.3.4.e. Safe Routes to School Programs

The City of Fresno participates in Safe Routes to School planning and funding efforts intended to improve safety and accessibility for students traveling to and from school. The City's 2018 Safe Routes to School Action Plan evaluated transportation conditions near schools throughout Fresno and identified infrastructure and programmatic improvements intended to enhance student safety and promote active transportation.

In addition, Fresno COG's Measure C Safe Routes to School Program continues to provide funding opportunities for pedestrian and bicycle improvements near schools, particularly in areas with demonstrated transportation safety needs.

4.12.4 Impact Analysis

4.12.4.1 Thresholds of Significance

The thresholds for determining the significance of impacts for this analysis of transportation are based on the environmental checklist in the State CEQA Guidelines, as amended. The project would have a significant impact related to transportation if it would:

- conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, considering all modes of transportation including mass transit and nonmotorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit;
- result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks;
- substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersection) or incompatible uses (e.g., farm equipment);
- result in adequate emergency access; or
- conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities or otherwise decrease the performance or safety of such facilities.

4.12.4.2 Methodology

Impacts to transportation are analyzed qualitatively as the project would not increase student capacity and vehicle trips. Impacts to transportation are primarily analyzed stemming from the reorientation of the campus where buildings, parking lots, or drop-off locations along Jensen Avenue would shift campus circulation.

As requested by the City of Fresno in their Notice of Preparation comment letter, this section also uses Safe Route to School methodology to analyze the physical changes of the proposed project as it relates to transportation safety.

4.12.4.3 Impacts and Mitigation Measures

4.12.4.3.a.Impact TRAN-A:

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

Less Than Significant with Mitigation Incorporated

State, regional, and local transportation plans and policies emphasize multimodal transportation, roadway safety, active transportation connectivity, and accommodation of pedestrians, bicyclists, transit users, and motorists. Relevant plans and policies include the California Complete Streets Act, Caltrans Complete Streets policies, the Fresno Council of Governments Regional Transportation Plan and Sustainable Communities Strategy, the Fresno County Safe Streets and Roads for All Action Plan, the City of Fresno General Plan, the City of Fresno Active Transportation Plan, the City of Fresno Vision Zero Action Plan, and local Safe Routes to School programs.

Construction

Project construction may enter the public right-of-way for roadway, sidewalk improvements or utility connections which would temporarily interfere with the flow of traffic, however, this impact would be temporary and construction would abide by any traffic control requirements through the discretionary review of an encroachment permit application to the City of Fresno for lane closures, should a lane closure be necessary. The implementation of a traffic control plan approved by the City of Fresno would minimize the impact of construction on general traffic flow.

Operation

The proposed project would reconstruct and modernize the existing Calwa Elementary School campus without increasing student enrollment capacity or generating additional school-related trips. Accordingly, the potential for conflicts with applicable transportation plans, policies, and programs is primarily limited to changes in campus access and circulation patterns rather than increases in transportation demand.

Several project features would support the goals and objectives of these plans and policies. These include relocation of the primary student entrance to Cedar Avenue adjacent to an existing signalized pedestrian crossing, construction of an on-campus student drop-off loop and parking lot, and development of a dedicated on-campus bus loading area. Collectively, these improvements would enhance the separation of parent/guardian vehicles, school buses, pedestrians, and bicyclists while reducing conflicts with through traffic along Cedar Avenue and Jensen Avenue.

However, the project would modify school circulation patterns by directing parent and guardian pick-up and drop-off traffic to the proposed northwest parking lot and egress onto Kaviland Avenue. As discussed in Appendix G, several intersections and roadway segments along anticipated outbound circulation routes contain limited traffic-control and traffic-calming features. While these conditions predate the project, the modified circulation pattern could increase reliance on these facilities during school pick-up and drop-off periods and thereby increase the potential for vehicle, pedestrian, and bicycle conflicts. Consequently, the project has the potential to conflict with City of Fresno transportation safety objectives intended to improve pedestrian safety, support Safe Routes to School travel, and reduce transportation-related conflicts. The conflict with the City's transportation safety objects is a **significant impact**.

> **Mitigation Measure TRAN-1: Traffic Engineering Consultation with City and County of Fresno.** The District and the Design-Build Entity for the project shall coordinate with the City of Fresno Public Works Department and/or Traffic Engineering Division and the County of Fresno Public Works and Planning during project design to review proposed parking lot layouts, drive approach locations, internal circulation patterns, pedestrian access points, bicycle access, and associated transportation safety features.
>
> This coordination shall include one or more meetings during the design process. The City and County of Fresno may identify reasonable transportation safety improvements necessary to address project-related circulation changes and maintain safe and efficient operation of the adjacent public roadway network. Such improvements shall be consistent with applicable City and County standards, adopted policies, and site-specific engineering considerations and shall be limited to measures reasonably related to project effects.

Therefore, implementation of Mitigation Measure TRAN-1 with City and County of Fresno would require coordination with the City and County of Fresno during final project design to evaluate the proposed circulation system and identify any transportation safety improvements determined necessary to address project-related circulation changes. This process would ensure that final project access, circulation patterns, and associated

transportation safety features are designed to be consistent with applicable City and County standards, adopted transportation policies, Vision Zero objectives, Safe Routes to School goals, and other relevant transportation safety programs.

The City and County would have the opportunity to recommend reasonable transportation safety improvements related to project effects and ensure consistency with applicable transportation plans and policies. Therefore, the project would not conflict with an applicable program, plan, ordinance, or policy addressing the circulation system, and impacts would be **less than significant with mitigation incorporated**.

4.12.4.3.b.Impact TRAN-B:

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

Less Than Significant

CEQA Guidelines Section 15064.3(b) requires analysis of transportation impacts using vehicle miles traveled (VMT) rather than vehicle delay or level of service. Generally, projects that do not increase VMT are considered less than significant for purposes of CEQA transportation analysis.

The proposed project would reconstruct and modernize the existing Calwa Elementary School campus without increasing student enrollment capacity or employee capacity. As a result, the project would not generate significant additional student, employee, school bus, or parent/guardian trips beyond those associated with existing school operations. Because the project would not significantly increase enrollment or employment, it would not be expected to increase VMT relative to existing conditions.

In addition, the project site is served by Fresno Area Express Route 38 and is located within a High-Quality Transit Area, further supporting the conclusion that the project would not result in a significant VMT impact.

Although the project would modify on-site circulation patterns and access configurations, these changes would not increase transportation demand or VMT and therefore would not conflict with CEQA Guidelines Section 15064.3(b). Accordingly, the project would not result in a significant transportation impact under CEQA Guidelines Section 15064.3(b), and impacts would be **less than significant**.

4.12.4.3.c.Impact TRAND-C:

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

Less than Significant Impact

The project would not introduce roadway geometric features such as sharp curves, restricted sight-distance conditions, unusual roadway alignments, or other design elements that could create a transportation hazard.

The project would modify campus access and circulation through construction of a new northwest student parking lot and drop-off area, relocation of the primary student entrance to Cedar Avenue, construction of a dedicated on-campus bus loading area, a southeast staff parking lot, and reconfiguration of internal campus circulation. These improvements would occur within an existing urbanized area served by established public roadways and would be designed in accordance with applicable City of Fresno standards and reviewed through the City's permitting and engineering review processes.

The project would not introduce land uses that are incompatible with the surrounding roadway system. The site would continue to operate as an elementary school and would not involve agricultural operations, heavy industrial activities, or other uses that could generate conflicts with existing transportation facilities. Although freight-truck traffic currently occurs along Cedar Avenue and Jensen Avenue Bypass because of surrounding industrial and transportation-related land uses, the project would not increase truck traffic or introduce new incompatible roadway users.

The project would alter circulation patterns by directing a portion of student pick-up and drop-off traffic to Kaviland Avenue and adjacent neighborhood streets. While several downstream intersections currently contain limited traffic-control and traffic-calming features, these conditions exist as characteristics of the roadway network and do not constitute hazardous geometric design features created by the project. In addition, final project access improvements would be subject to review and approval by the City of Fresno to ensure safe operation and appropriate design of project driveways and circulation facilities.

Therefore, the project would not substantially increase hazards due to a geometric design feature or incompatible land use, and impacts would be **less than significant**.

4.12.4.3.d. Impact TRAN-D:

Would the project result in inadequate emergency access?

Less Than Significant Impact

Construction

Project construction would require temporary lane, shoulder, and sidewalk closures associated with utility installation, demolition of existing driveways and sidewalks, construction of new driveways and sidewalks, and other frontage improvements. Construction activities are anticipated to occur along portions of Cedar Avenue, Jensen Avenue, and Kaviland Avenue. These activities could temporarily affect traffic operations, pedestrian and bicycle travel, and emergency vehicle access in the immediate project vicinity.

However, work occurring within the public right-of-way would be subject to the City of Fresno encroachment permit process and associated traffic control requirements. As part of this process, the District's agent would be required to prepare and implement a temporary traffic control plan to maintain safe movement of vehicles, pedestrians, bicyclists, transit users, and emergency response vehicles through and around construction areas. City of Fresno standards require that at least one 12-foot travel lane be maintained in each direction at all times and prohibit closure of public streets without prior City approval (Public Works Department, City of Fresno, 2021).

In addition, any temporary lane closures, traffic-control measures, or roadway construction activities would be coordinated with the City of Fresno and would be publicly available to emergency service providers. Compliance with City encroachment permit conditions and temporary traffic control requirements would ensure that emergency response vehicles maintain access through the project area during construction.

For on-site conditions, the design-build entity would be required to maintain emergency access routes to active school facilities and construction areas in accordance with Division of the State Architect requirements, applicable fire codes, and project specifications. Accordingly, construction activities would not result in substantial interference with emergency access.

Therefore, impacts related to emergency access during construction would be **less than significant**.

Operation

Operation of the reconstructed campus would not result in the permanent closure or obstruction of any public roadway and would not impair emergency access to the project site or surrounding area. The project would reconstruct campus circulation, access points, parking facilities, and internal roadways in accordance with applicable Division of the State Architect requirements, California Fire Code requirements, and City of Fresno Fire Department emergency access standards.

The project would maintain adequate emergency vehicle access to all portions of the campus through designated fire access routes, emergency access gates, and other required emergency access features incorporated into the final design. Therefore, operation of the project would result in no impact related to emergency access.

As discussed above, impacts to emergency access would be **less than significant.**

4.13 Tribal Cultural Resources

4.13.1 Introduction

The following section evaluates the project's impact on tribal cultural resources (TCRs). The information and analysis in this section are based on the *Archeological Resources Survey Report (ARSR) for the Calwa Elementary School Reconstruction Project*, Johnston, 2026 (see Appendix D) and complete Sacred Land Files Search and AB 52 Tribal Notifications (see Appendix E).

4.13.2 Environmental Setting

4.13.2.1 Geology and Soils

Soil mapping from the 2026 USDA Web Soil Survey indicates that the project site is underlain primarily by Greenfield soil (GtA), which typically occurs on low-elevation alluvial fans and terrace landforms with slopes ranging from 0 to 30 percent. Greenfield soils developed in moderately coarse to coarse alluvial deposits and locally in wind-deposited sediments derived from granitic and mixed geologic sources. These depositional settings are characteristic of geomorphic surfaces that have experienced episodic sedimentation and landscape stability during the late Holocene.

Additional soil units mapped within the site include Delhi Loamy Sand (DhA), Hesperia Sandy Loam, Very Deep (HsD), and Hesperia Fine (HsR). These soil types are associated with relatively young alluvial fan surfaces related to the Kings River system, as well as former floodplain environments. Collectively, mapped soils at the site formed during the late Holocene, with estimated ages ranging from approximately 4,000 years before present to as recent as 150 years before present.

From a tribal cultural resource sensitivity standpoint, late Holocene alluvial deposits may retain buried cultural materials where landforms remained stable long enough for occupation or use by Native American groups. Conversely, younger or frequently reworked floodplain deposits may exhibit a reduced potential for intact surface expressions but may still contain subsurface resources depending on depositional history and depth of disturbance. Considering geology/soils and proximity to historic water bodies, Meyer et. al (2010) developed a prehistoric archeological sensitivity model for the San Joaquin Valley. This model identifies Calwa as having a low to moderately-low potential for the presence of buried prehistoric archeological deposits (Meyer, Jack, Young, & Rosenthal, 2010).

4.13.2.2 Prehistory

The San Joaquin Valley and surrounding Sierra foothills and Coast Ranges have a long and complex prehistoric sequence extending back more than 11,000 years. The earliest generally recognized occupation is associated with the Clovis complex, dated to approximately 10,900 to 11,200 years before present (BP), characterized by fluted spear points found near the margins of now-extinct lakes and associated with large Pleistocene fauna.

Following the Clovis period, the Western Pluvial Lakes tradition developed, generally dated between 8,000 and 10,000 BP. This poorly defined cultural pattern is known from a limited number of sites in the San Joaquin Valley, adjacent foothills, and Central Coast Ranges and is characterized by stemmed projectile points. This tradition is thought to represent a transition toward later prehistoric lifeways.

Beginning around 8,000 BP, subsistence strategies increasingly emphasized plant processing, particularly seed gathering, as reflected by the appearance of food-grinding implements. This shift corresponds to the Milling Stone Horizon, which is now understood to have been widespread throughout much of California. Between approximately 6,000 and 4,000 BP, archaeological assemblages indicate more intensive use of local resources.

Within the last 3,000 years, cultural patterns have become increasingly complex, with evidence for population growth, specialized subsistence practices, expanded exchange networks, and social differentiation. Sites from this period commonly include mortars, pestles, and bedrock milling features associated with intensive acorn processing, as well as well-crafted artifacts such as beads and charmstones, sometimes found in mortuary contexts.

4.13.2.3 Ethnohistory

At the time of European contact in the late eighteenth century, the Yokuts Tribe occupied much of the San Joaquin Valley, including the area encompassing present-day Fresno and Clovis. Yokuts territory extended from the San Joaquin River south to the Tehachapi Pass and included valley floors, riparian corridors, and adjacent Sierra Nevada foothills. The Yokuts represented the largest Native American population group in pre-contact California, supported by the region's abundant riverine and terrestrial resources.

The Yokuts were organized into regionally distinct groups, including Northern Valley, Southern Valley, and Foothill Yokuts, whose subsistence practices reflected local ecological conditions. Valley groups relied heavily on acorns and salmon, and settlements were commonly situated near major waterways, springs, and seasonally reliable water sources. Villages typically consisted of semi-permanent or permanent structures, and occupation patterns ranged from seasonal use to year-round settlement.

Spanish exploration and missionization beginning in the late 1700s initiated severe disruptions to Yokuts lifeways through forced relocation, population decline, and loss of traditional lands. Subsequent Mexican and American periods intensified these impacts through land dispossession, violence, disease, and economic marginalization. By the mid-nineteenth century, many surviving Yokuts individuals were displaced from ancestral territories and engaged in wage labor on ranches or farms. Federal actions later established limited reservation lands for remaining Yokuts populations, including acreage associated with the Fresno and Tule River Reservations.

4.13.2.4 Native American Consultation

A Sacred Lands File search was conducted with the California Native American Heritage Commission (NAHC) which provided a list of tribal contacts for consultation in accordance with AB 52 (Public Resources Code §§21080.3.1 and 21080.3.2). In a letter dated November 7, 2025 (Appendix E), the NAHC reported that the Sacred Lands File search did not identify any recorded sacred lands within the project area and furnished a list of five tribal groups and individuals for consultation purposes.

The District subsequently transmitted notification letters to the five NAHC-identified tribal contacts in November 2026. As of the date of this DEIR, no responses were received by any of the contacted tribes. Tribes and individuals contacted regarding the project are summarized in Appendix E. While the AB 52 statutory consultation process is initiated through a 30-day request period, consultation itself is an ongoing, good-faith process that must be completed prior to project approval if requested by an affected tribe.

4.13.3 Regulatory Setting

4.13.3.1 Federal Laws, Regulations, and Policies

The proposed project does not involve federal funding, federal land, or a federal permit, authorization, or approval. As a result, federal cultural resource regulations, including Section 106 of the National Historic Preservation Act (NHPA), would not apply to the project. Section 106 applies only to federal undertakings and requires consideration of effects on historic properties, including properties of traditional religious and cultural importance to Indian Tribes. Because no federal nexus exists, compliance with the NHPA is not required for the proposed project.

Similarly, other federal statutes related to cultural resources, such as the Native American Graves Protection and Repatriation Act (NAGPRA) and the Archaeological Resources Protection Act (ARPA), generally apply to actions on federal or tribal lands. These statutes would not govern project activities occurring solely on non-federal land without federal involvement.

4.13.3.2 State Laws, Regulations, and Policies

4.13.3.2.a. California Public Resources Code Section 5097.98

Public Resources Code Section 5097.98 specifically addresses the inadvertent discovery of Native American human remains. If human remains are discovered during ground-disturbing activities, work must cease in the vicinity of the discovery, and the county coroner must be notified. If the remains are determined to be Native American, the Native American Heritage Commission (NAHC) is contacted to identify the Most Likely Descendant, who then consults on appropriate treatment and disposition of the remains.

4.13.3.2.b. California Environmental Quality Act (CEQA)

At the state level, protection of tribal cultural resources is governed by the California Environmental Quality Act (CEQA) (Public Resources Code §21000 et seq.). CEQA requires state and local agencies to identify and evaluate environmental impacts associated with discretionary projects and to avoid or mitigate significant impacts where feasible.

Assembly Bill 52 (AB 52), enacted in 2014, amended CEQA to formally recognize Tribal Cultural Resources (TCRs) as a distinct category of cultural resources (Public Resources Code §21074). A tribal cultural resource includes sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American Tribe that are either: 1) Listed or eligible for listing in the California Register of Historical Resources or a local historic register; or 2) Determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to CEQA.

AB 52 also established mandatory consultation procedures between lead agencies and California Native American Tribes that are traditionally and culturally affiliated with the project area. Under Public Resources Code §21080.3.1, a lead agency must notify tribes that have requested such notice of projects within the agency's jurisdiction. Upon a tribe's written request, the lead agency must engage in consultation to identify tribal cultural resources, assess potential impacts, and develop measures to avoid, minimize, or mitigate significant impacts. Consultation must occur prior to certification of an EIR or adoption of a negative declaration and is considered complete only when mutual agreement is reached or the lead agency documents a good-faith effort.

Pursuant to Public Resources Code §21084.2, a project that would cause a substantial adverse change in the significance of a tribal cultural resource would be considered to have a significant environmental impact under

CEQA. If such impacts are identified, CEQA requires adoption of feasible mitigation measures or alternatives to reduce impacts to the extent feasible.

4.13.3.2.c. Treatment of Human Remains

Discovery of human remains during project-related ground disturbance is governed by the California Health and Safety Code §7050.5 and Public Resources Code §5097.98. If human remains are encountered, work in the vicinity must cease, and the county coroner must be notified. If the coroner determines the remains to be Native American, the Native American Heritage Commission (NAHC) would identify a Most Likely Descendant (MLD). The MLD would provide recommendations for the appropriate treatment and disposition of the remains and any associated cultural items.

4.13.4 Impact Analysis

This section describes the existing environmental and regulatory setting of the project area and analyzes the potential impacts of the project on cultural resources. This section also describes the criteria for determining the significance of impacts, approach to assessing impacts, and possible mitigation measures.

4.13.4.1 Thresholds of Significance

Section 15064.5 of CEQA requires that lead agencies determine whether projects may have a significant effect on archaeological and historical resources. This determination applies to those resources that meet significance criteria qualifying them as “unique” or “important” in the CRHR, or as eligible for listing in the CRHR. For the purpose of this section, a resource shall be considered to be historically significant if it meets the criteria for listing in the CRHR (PRC Section 5024.1, 14 CCR Section 4852). If the agency determines that a project may have a significant effect on a significant resource, the project is determined to have a significant effect on the environment, and these effects must be addressed. If a cultural resource is found not to be significant under the qualifying criteria, it need not be considered further in the planning process.

Under CEQA Section 21084.1, the fact that a resource is not listed or determined to be eligible for listing in the CRHR, is not included in a local register, or is not deemed significant pursuant to criteria set forth in PRC Section 5024.1(g) shall not preclude a lead agency from determining whether the resource may be a historical resource. A property must meet at least one of the following criteria to be eligible for inclusion in the CRHR:

- It is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage.
- It is associated with the lives of persons important in our past.
- It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic value.
- It has yielded, or may be likely to yield, information important in prehistory or history.
- Based on the State CEQA Guidelines, the project would have a significant impact on cultural resources if it would:
- cause a substantial adverse change in the significance of a historical resource as defined in CEQA Section 15064.5;
- cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Section 15064.5;
- directly or indirectly destroy a unique paleontological resource or site or unique geologic feature; or

- disturb any human remains, including those interred outside of formal cemeteries.

CEQA does not establish criteria for determining the significance of paleontological resources. The environmental checklist form in the State CEQA Guidelines and the standard guidelines for assessment and mitigation of adverse impacts on paleontological resources set forth by the Society of Vertebrate Paleontology were used to establish three categories of sensitivities: high, low, and undetermined. Areas that consist of rock not of sedimentary origin and that have not been known to produce fossils are considered low-sensitivity areas.

4.13.4.2 Methodology

The tribal cultural resources analysis was prepared in accordance with CEQA and AB 52 requirements and is based on the *Archeological Resources Survey Report (ARSR) for the Calwa Elementary School Reconstruction Project* (Johnston, 2026), the NAHC Sacred Lands File search, and tribal outreach efforts conducted by the District. Environmental factors, including local soils, geomorphology, prehistoric land use patterns, ethnographic information, and known cultural resources, were reviewed to assess the potential for tribal cultural resources to occur within the project area.

Potential impacts were evaluated by comparing project activities, including ground-disturbing construction, against the CEQA significance thresholds identified in Section 4.13.4.1. The analysis considered the presence of known tribal cultural resources, the results of tribal consultation efforts, site conditions, and the potential for previously unidentified resources to be encountered during construction. Where appropriate, avoidance measures and procedures for the inadvertent discovery of tribal cultural resources or Native American human remains were considered to reduce potential impacts.

4.13.4.3 Impacts and Mitigation Measures

4.13.4.3.a.Impact TCR-1:

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

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

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

Less than Significant Impact with Mitigation Incorporated

As determined in the ASAR included in Appendix D, there are no identified tribal cultural resources at the project site. There were no comments received from California Native American Tribes traditionally and culturally affiliated with the project location. There are no listed or eligible sites for listing in the California Register of Historical Resources or in a local register of historical resources. The Project would result in a less than significant impact to listed or known eligible tribal cultural resources (TCRs).

Despite there being no evidence of tribal cultural resources at the project site, there still remains the potential for inadvertent discoveries of unknown TCRs during excavation activities which could result in a **significant impact**. Therefore, Mitigation Measure TC-1 would be incorporated into the project.

> **MM-TCR-1: Inadvertent Tribal Cultural Resources Discovery.** If tribal cultural resources are inadvertently discovered during ground-disturbing activities associated with the project, the following procedures would be implemented:
>
> - **Immediate Work Stoppage.** All work within 100 feet of the discovery shall cease immediately. The Design-Build Entity shall notify the project lead agency.
> - **Notification of Tribal Representatives and Qualified Professional.** The lead agency shall immediately notify all California Native American tribe traditionally and culturally affiliated with the Project area and a qualified archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards.
> - **Evaluation of the Discovery.** The qualified archaeologist, in consultation with the lead agency and the notified tribes, shall evaluate the find to determine whether it qualifies as a tribal cultural resource under CEQA Guidelines Section 21074.
> - **Treatment Plan.** If the resource is determined to be a tribal cultural resource, the lead agency, in consultation with the tribes and the qualified archaeologist, shall develop and implement an appropriate treatment plan. The plan shall outline measures for avoidance, preservation in place, or other culturally appropriate treatment consistent with Public Resources Code Section 21083.2 and CEQA Guidelines Section 15126.4.
> - **Resumption of Work.** Work in the area of the discovery shall not resume until the treatment plan has been implemented and the lead agency, in consultation with the tribes, authorizes continuation.

With the implementation of Mitigation Measure TCR-1, this impact to potential unknown TCRs would be **less than significant with mitigation Incorporated.**

Sub-Chapter 4C Topics Requiring a Brief Level of Analysis

CEQA Guidelines Section 15128 requires a brief discussion of any potential environmental effects that were found not to be significant during preliminary review of a project pursuant to State CEQA Guidelines Section 15060 and, for this reason, are not analyzed in detail in the DEIR. An EIR shall contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and were therefore not discussed in detail in this DEIR.

4.14 Agriculture and Forestry Resources

4.14.1 Introduction

This section describes the existing environmental and regulatory setting of the project area and analyzes the potential impacts of the project on agriculture and forestry resources. This section also describes the criteria for determining the significance of impacts, approach to assessing impacts, and possible mitigation measures.

4.14.2 Environmental Setting

The project area consists of a fully developed school and grassy turf and does not contain any agricultural or forestry resources within its boundaries.

4.14.3 Regulatory Setting

4.14.3.1.a. California Department of Conservation

The California Department of Conservation implements the Farmland Mapping and Monitoring Program (FMMP) which produces maps and statistical data used for rating California's agricultural land resources. Agricultural land is rated according to soil quality and irrigation status, where the best quality land is designated as Prime Farmland. Maps are updated every two years using computer mapping, aerial imagery, public review, and field investigations. The California Department of Conservation's (DOC) 2020 FMMP is a non-regulated program that creates "Important Farmland" maps and statistical data for analyzing California's agricultural resources in eight land use categories. According to maps prepared by the California Department of Conservation, the project site is located on Urban and Built-Up Land (CA Dept. of Conservation, 2026).

4.14.4 Impact Analysis

4.14.4.1 Thresholds of Significance

The thresholds for determining the significance of impacts for this analysis of agriculture and forest and timberland resources are based on the environmental checklist in the State CEQA Guidelines, as amended. The project would have a significant impact on agriculture and forest and timberland resources if it would:

- 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;
- Conflict with existing agricultural zoning or Williamson Act contracts;
- Conflict with existing zoning for, or cause rezoning of, forestland (as defined in PRC Section 12220[g]), timberland (as defined by PRC Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104[g]);
- Result in the loss of forestland or conversion of forestland to nonforest use; or
- Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to nonagricultural use or conversion of forestland to nonforest use.

4.14.4.2 Methodology

The analysis of the project's potential impacts was based on an evaluation of the effects of the project on existing agriculture and timberland resources. In determining the extent and implications of the impacts, consideration was given to:

- The existing agriculture/timberland setting;
- conflicts with farmland, timberland, and land use designations;
- conflicts with Williamson Act contracts; and
- the extent to which the affected environment contains existing or ongoing agricultural practices.

4.14.4.3 Impacts and Mitigation Measures

4.14.4.3.a.Impact AG-A:

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

No Impact
The project area is within the city limits of Fresno. It is not classified or considered long-term strategic farmland and is surrounded by commercial shopping centers and urban residences. The proposed project would have **no impact**.

4.14.4.3.b.Impact AG-B:

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

No Impact
The campus is designated Public Facilities in the City of Fresno General Plan and is zoned Public and Institutional (PI) (City of Fresno, 2026). The proposed site is not enrolled in a Williamson act contract. As there is no conflict with agricultural land use or Williamson Act, the proposed project would have **no impact**.

4.14.4.3.c.Impact AG-C:

Would the project conflict with existing zoning for, or cause rezoning of, forestland, timberland, or timberland zoned Timberland Production?

No Impact

The project area consists of a fully developed school and grassy turf and does not contain any agricultural or forestry resources within its boundaries. Additionally, the project site is not zoned for forestland, timberland, or for timberland production. The proposed project would have **no impact**.

4.14.4.3.d.Impact AG-D:

Would the project result in the loss of forestland or conversion of forestland to non-forest use?

No Impact

For reasons stated previously, there would be no loss of or conversion of farmland to non-farm use. The proposed project would have **no impact**

4.14.4.3.e.Impact AG-E:

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

No Impact

For reasons stated previously, there would be no changes in the existing environment that would result in the conversion of farmland to non-agricultural use or conversion of forestland to non-forest use. The project would have **no impact.**

4.15 Land Use and Planning

4.15.1 Introduction

This section describes the existing environmental and regulatory setting of the project area and analyzes potential project impacts related to land use. This section also describes the criteria for determining the significance of impacts, approach to assessing impacts, and possible mitigation measures.

4.15.2 Environmental Setting

The project site is zoned as Public and Institutional (PI) by the City of Fresno (City of Fresno, 2025). The site is an existing elementary school campus, which is permitted in PI zoned parcels, and the project would not change this land use. As the project would not change the land use, nor increase the existing school's footprint, the project would not have any impact on Land Use and Planning.

4.15.3 Regulatory Setting

The City's General Plan is a long-range planning document that governs growth and development in Fresno. The project site is located within the Fresno city limits.

4.15.4 Impact Analysis

4.15.4.1 Thresholds of Significance

The thresholds for determining the significance of impacts for this analysis of land use are based on the environmental checklist in the State CEQA Guidelines, as amended. The project would have a significant impact related to land use if it would:

- physically divide an established community;
- conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect; or
- conflict with any applicable habitat conservation plan or natural community conservation plan.

4.15.4.2 Methodology

The footprint of the proposed project area and present land use was compared to the City of Fresno General Plan 2025.

4.15.4.3 Impacts and Mitigation Measures

4.15.4.3.a.Impact LUP-A

Would the project physically divide an established community?

No Impact

The physical division of an established community typically refers to the construction of a physical feature—such as an interstate highway or railroad—or the removal of access routes, such as local roads or bridges, that would

impair mobility within a community or between a community and surrounding areas. The project site is located on the existing Calwa Elementary School campus in the City of Fresno and encompasses approximately 10 acres, including the 7.89-acre campus and 1.11 acres of adjacent sidewalk right-of-way. The site is surrounded by commercial/industrial development and urban residential uses. The proposed project would not introduce any features that would physically divide the community or restrict access in a manner that would impair mobility. The proposed project would have **no impact.**

4.15.4.3.b.Impact LUP-B

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

No Impact

The designated land use for the project site, according to the City of Fresno General Plan, is Public Facilities and is zoned Public and Institutional (PI) (City of Fresno, 2025). The project site is on the existing Calwa Elementary School campus and is bordered to the west by the unincorporated community of Calwa in Fresno County. Land uses within approximately a 0.5-mile radius are predominately residential to the north, east, west, and southwest, with industrial uses located to the southeast. At a broader scale of 2.5-mile, the surrounding land use pattern transitions to more extensive industrial development to the south, southwest, and southeast. There is no conflict with existing land use plan, policy, or regulations. Therefore, the proposed project would have **no impact.**

4.16 Mineral Resources

4.16.1 Introduction

This section describes the existing environmental and regulatory setting of the project area and analyzes the potential impacts of the project on mineral resources. This section also describes the criteria for determining the significance of impacts, approach to assessing impacts, and possible mitigation measures

4.16.2 Environmental Setting

The project site is located within an urban environment that has historically had agricultural land uses. As discussed in Section 4.8 Geology and Soils, the site is underlain by sandy soils but has likely been covered in appropriate backfill building construction and grassy turf fields.

The project site is in a SMARA study area known as the Fresno Production-Consumption Region for Portland Cement Concrete aggregate, the nearest aggregate mine is the Kings River Aggregates which is located approximately 13 miles to the east (California Department of Conservation, 2025). Oil is another mineral resource that has been extracted from the Central Valley floor, though the nearest active well is approximately 17 miles to the southwest (California Department of Conservation, 2025).

4.16.3 Regulatory Setting

4.16.3.1 Federal Laws, Regulations, and Policies

No federal laws, regulations, or policies related to mineral resources apply to the project.

4.16.3.2 State Laws, Regulations, and Policies

4.16.3.2.a.Surface Mining and Reclamation Act (SMARA)

Sections 2761(a), 2761(b), and 2790 of the Surface Mining and Reclamation Act (SMARA) provide a mineral lands inventory process. The California Geological Survey and the State Mining and Geology Board are the State agencies responsible for inventorying mineral lands. The primary objective of the process is to provide local agencies with information about the locations, need, and importance of minerals within their respective jurisdictions. SMARA also regulates the closure and reclamation of sand and gravel mines (Department of Conservation).

4.16.4 Impact Analysis

4.16.4.1 Thresholds of Significance

The thresholds for determining the significance of impacts for this analysis on mineral resources are based on the environmental checklist in the State CEQA Guidelines, as amended. The project would have a significant impact related to mineral resources if it would:

- 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; or

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

4.16.4.2 Impacts and Mitigation Measures

4.16.4.2.a.Impact MINE-A

Would the 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 project would involve the redevelopment of an existing school where mineral extraction does not occur, and where mineral resources are not known to exist. Though the project site is in a SMARA study area, the nearest aggregate mine is approximately 13 miles to the north along the San Joaquin River. Oil is another mineral resource that has been extracted from the Central Valley floor, though the nearest active well is approximately 17 miles southwest.

Regardless, the extraction of minerals would be incompatible with the site's land use and surrounding land uses (e.g., school, residential, religious, and medical). There would be **no impact.**

4.16.4.2.b.Impact MINE-B

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

No Impact

For reasons stated above in Section 4.16.4.2.a, the proposed project would have **no impact**.

4.17 Population and Housing

4.17.1 Introduction

This section describes the existing setting of the project area with regard to population, employment, and housing and analyzes the potential impacts of the project on population and housing.

4.17.2 Environmental Setting

The project site is an existing public school and does not have residential dwelling units on the project site. The surrounding areas are mostly developed.

4.17.3 Regulatory Setting

No federal, state, or local laws, regulations, or policies related to population and housing apply to the project.

4.17.4 Impact Analysis

4.17.4.1 Thresholds of Significance

The thresholds for determining the significance of impacts for this analysis of population and housing are based on the environmental checklist in the State CEQA Guidelines, as amended. The project would have a significant impact on population and housing if it would:

- Induce substantial 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);
- displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere; or
- displace substantial numbers of people, necessitating the construction of replacement housing elsewhere.

4.17.4.2 Methodology

The analysis of the project's potential impact was based on an assessment of the project's effects on population and housing in the vicinity of the project area.

4.17.4.3 Impacts and Mitigation Measures

4.17.4.3.a.Impact POP-A

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

No Impact

The project would not directly or indirectly induce unplanned population growth as the project would not involve the construction of new housing or businesses, nor would the project involve the extension of infrastructure. The proposed project would have **no impact**.

4.17.4.3.b.Impact POP-B

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

No Impact

The project would not impact any existing housing. The project would involve the redevelopment of an existing school with no intention of increasing enrollment. The project would not result in unplanned population growth nor would result in a need for additional housing. The proposed project would have **no impact.**

4.18 Public Services

4.18.1 Introduction

This section describes the existing environmental and regulatory setting of the project area and analyzes the potential impacts of the project on public services. This section also describes the criteria for determining the significance of impacts, approach to assessing impacts, and possible mitigation measures.

4.18.2 Environmental Setting

The project is located within a developed region of the City of Fresno. The Calwa Elementary School is already served by existing public services such as fire protection and police protection.

4.18.3 Regulatory Setting

4.18.3.1 Federal Laws, Regulations, and Policies

There are no federal laws, regulations, or policies related to public services that apply to the project.

4.18.3.2 State Laws, Regulations, and Policies

4.18.3.2.a. California Environmental Quality Act (CEQA)

The CEQA Guidelines identify public services as a category of environmental impact to be considered during environmental review. Pursuant to Appendix G of the CEQA Guidelines, a project may result in a significant impact if it would result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, including fire protection, police protection, schools, parks, or other public facilities, in order to maintain acceptable service ratios, response times, or other performance objectives.

4.18.3.2.b. School Facilities Funding and Impact Fees

California Government Code Section 65995 establishes the statutory framework for school facilities impact fees and recognizes such fees as the primary method for mitigating impacts of development on school facilities. For CEQA purposes, the payment of statutory school impact fees is generally deemed full mitigation for impacts on school facilities associated with residential and certain other forms of development.

4.18.3.2.c. California Fire Code and California Building Standards Code

The California Fire Code and California Building Standards Code establish minimum requirements for fire and life safety features in buildings and sites. New construction and redevelopment projects must comply with applicable fire access, water supply, emergency access, occupancy, and life safety requirements as enforced by the authority having jurisdiction.

4.18.3.3 Local Laws, Regulations, and Policies

4.18.3.3.a. City of Fresno General Plan

The Fresno General Plan includes goals and policies intended to ensure adequate public facilities and services are available to serve existing and future development. The Public Utilities and Services Element provides a framework for maintaining and improving public services, including fire protection and police services, and emphasizes the efficient use of existing infrastructure and public facilities (City of Fresno, 2014).

Relevant General Plan policies include:

- Ensuring that public facilities and services are provided at levels necessary to serve existing and planned development.
- Supporting the efficient use of existing public facilities and infrastructure before requiring construction of new facilities.
- Maintaining adequate police and fire protection services to protect public health, safety, and welfare.

4.18.3.3.b. Fresno Unified School District Facilities Planning

Calwa Elementary School is operated by the District, which is responsible for planning, constructing, modernizing, and maintaining school facilities necessary to serve students within the District's service area. Proposed school improvements are evaluated to ensure that educational facilities continue to meet student, staff, safety, and operational needs.

4.18.3.3.c. City of Fresno Parks and Recreation Planning

The City of Fresno maintains a network of public parks and recreational facilities intended to serve residents throughout the city. The City's planning efforts seek to maintain and improve access to parks and recreational opportunities while ensuring that park facilities keep pace with community needs. Public school campuses may also provide recreational amenities for students during school hours and, where authorized, for community use.

4.18.4 Impact Analysis

4.18.4.1 Thresholds of Significance

The thresholds for determining the significance of impacts for this analysis of public services are based on the environmental checklist in the State CEQA Guidelines, as amended. The project would have a significant impact on public services if it would:

- 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, to maintain acceptable service ratios, response times, or other performance objectives for any of the following public services: fire protection, police protection, schools, parks, or other public facilities.

4.18.4.2 Impacts and Mitigation Measures

4.18.4.2.a. Impact PUB-A

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities or need for new or physically altered government facilities, the

construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

i. Fire?

No Impact
Fire protection is provided by the City of Fresno Fire Department which currently serves the project site. The project would design facilities in accordance with Fresno Fire Department and Division of State Architects (DSA) standards, which would improve the existing facilities with up-to-date design that reduces the fire hazard at the project site. The proposed project would have **no impact**.

ii. Police?

No Impact
Police protection is provided by the City of Fresno Police Department which currently serves the project site. Additionally, the District ensures that Student Resource Officers are able to assist with law enforcement on school campuses. The proposed project would have **no impact**.

iii. Schools?

No Impact
The project would modernize the existing campus ensuring higher quality facilities and capacity for the Calwa Elementary School area. The proposed project would have **no impact**.

iv. Parks?

No Impact
The project would provide improved recreational facilities for students and community members. The proposed project would have **no impact**.

v. Other Public Facilities?

No Impact
All other services that are currently provided to the elementary school would continue to be provided. The project would have **no impact**.

As discussed above, implementation of the proposed project would not require new or expanded public facilities, nor would it result in the physical alteration of existing public facilities that could cause significant environmental effects. Accordingly, the proposed project would have **no impact** related to public services.

4.19 Recreation

4.19.1 Introduction

This section describes the existing environmental and regulatory setting of the project area and analyzes the potential impacts of the project on recreation. This section also describes the criteria for determining the significance of impacts, approach to assessing impacts, and possible mitigation measures.

4.19.2 Environmental Setting

The project site is an existing school comprising of educational buildings and recreational facilities such as playground and playfields. The nearest park is Calwa Hayston Park located approximately 0.25 miles to the northeast, with a larger recreational complex, the Calwa Recreation and Park District, located approximately 0.45 miles northeast.

4.19.2.1 Regulatory Setting

No federal, state or local laws, regulations, or policies related to recreation apply to the project.

4.19.3 Impact Analysis

4.19.3.1 Thresholds of Significance

The thresholds for determining the significance of impacts for this analysis of recreation resources are based on the environmental checklist in the State CEQA Guidelines, as amended. The project would have a significant impact on recreation resources if it would:

- 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; or
- include recreational facilities or require the construction or expansion of recreational facilities that may have an adverse physical effect on the environment.

4.19.3.2 Impacts and Mitigation Measures

4.19.3.2.a.Impact REC-A:

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

No Impact
The project would include improvements to onsite recreational facilities for students. The project would not cause or induce any regional population growth that would impact recreational facility use. Therefore, the proposed project would have **no impact**.

4.19.3.2.b.Impact REC-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?

Less than Significant Impact

The proposed project involves the modernization of existing recreational facilities, but no additional recreational facilities would be required to be constructed as a result of the project. The project would temporarily impact parts of existing recreational areas at the campus during construction. The project would have a **less than significant impact**

4.20 Utilities and Service Systems

4.20.1 Introduction

This section describes the existing environmental and regulatory setting of the project area and analyzes the potential impacts of the project on utilities and service systems. This section also describes the criteria for determining the significance of impacts, approach to assessing impacts, and possible mitigation measures.

4.20.2 Environmental Setting

The Calwa Elementary School receives utility service from the City of Fresno (i.e., Water, Wastewater, and Solid Waste), the Fresno Metropolitan Flood Control District (FMFCD) (i.e., stormwater drainage), and Pacific Gas & Electric (i.e., electricity and natural gas).

Water and Wastewater:
Water and sewer utilities are currently provided by the City of Fresno Department of Utilities. The City of Fresno receives its Water from multiple sources, including groundwater and surface water sources. The City of Fresno collects wastewater from the project site and conveys the wastewater to the Fresno-Clovis Regional Wastewater Treatment Facility where treatment occurs.

Solid Waste:
Solid waste generated from the project site is currently collected by the City of Fresno and is transported to the Cedar Avenue Recycling and Transfer Stations, and then to the regional landfill, the American Avenue Disposal Site.

Stormwater Drainage:
Stormwater generated from the project site is collected and conveyed by the special district, Fresno Metropolitan Flood Control District (FMFCD). Stormwater collected from the project site is directed to the stormwater retention basin, Basin "II1," located to the west of the project.

Energy:
Electrical power and natural gas are currently provided by Pacific Gas & Electric Company.

4.20.3 Regulatory Setting

4.20.3.1 Federal Laws, Regulations, and Policies

4.20.3.1.a. Clean Water Act (CWA)

The federal Clean Water Act establishes the basic framework for regulating discharges of pollutants into waters of the United States. Under the National Pollutant Discharge Elimination System (NPDES) program, permits are required for certain discharges to surface waters. In California, the State Water Resources Control Board (SWRCB) and Regional Water Quality Control Boards (RWQCBs) administer the NPDES permit program pursuant to authority delegated by the U.S. Environmental Protection Agency (EPA), as discussed in Section 4.10 *Hydrology and Water Quality*.

Safe Drinking Water Act (SDWA)

The Safe Drinking Water Act authorizes the EPA to establish national standards for drinking water quality and to protect drinking water sources. Public water systems are required to meet federal drinking water standards to protect public health.

4.20.3.2 State Laws, Regulations, and Policies

4.20.3.2.a. Porter-Cologne Water Quality Control Act

The Porter-Cologne Water Quality Control Act is California's primary water quality law. The Act establishes the authority of the State Water Resources Control Board and Regional Water Quality Control Boards to protect water quality and regulate waste discharges within the state. The Central Valley Regional Water Quality Control Board (Central Valley RWQCB) is responsible for regulating wastewater treatment, disposal, and water quality within the project area, as discussed in 4.10 *Hydrology and Water Quality*.

4.20.3.2.b. National Pollutant Discharge Elimination System (NPDES)

The State Water Resources Control Board administers the NPDES permit program through Regional Water Quality Control Boards. Construction activities that disturb one acre or more of soil are subject to the Statewide Construction General Permit and must implement best management practices to minimize erosion, sedimentation, and pollutant discharges in stormwater runoff.

4.20.3.2.c. California Integrated Waste Management Act (AB 939)

The California Integrated Waste Management Act established statewide goals for waste reduction, recycling, and landfill diversion. Local jurisdictions are required to implement programs that reduce the amount of solid waste disposed in landfills and promote recycling and resource recovery (CalRecycle, n.d.).

4.20.3.2.d. Short-Lived Climate Pollutant Reduction Act (SB 1383)

Senate Bill 1383 established statewide requirements to reduce the disposal of organic waste in landfills. Local jurisdictions and solid waste generators are required to comply with regulations related to organic waste recycling and edible food recovery (CalRecycle, n.d.).

4.20.3.2.e. California Green Building Standards Code (CALGreen)

Part 11 of Title 24, the California Green Building Standards Code, establishes mandatory measures for water conservation, construction waste reduction, and energy-efficient building design. New construction and modernization projects are required to comply with applicable CALGreen requirements.

4.20.3.2.f. California Energy Code

Part 6 of Title 24, the California Energy Code, establishes energy efficiency standards for new construction and building alterations. The Energy Code is intended to reduce energy consumption and increase energy efficiency in buildings throughout California.

4.20.3.3 Local Laws, Regulations, and Policies

4.20.3.3.a. City of Fresno General Plan

The City of Fresno General Plan includes goals and policies intended to ensure that public utilities and infrastructure systems are adequate to serve existing and future development. The Public Utilities and Services Element promote the efficient use of existing infrastructure; maintenance and expansion of water, wastewater, and storm drainage facilities as necessary; and coordination between development and available utility capacity.

4.20.3.3.b. City of Fresno Department of Public Utilities

The City of Fresno Department of Public Utilities is responsible for the provision of municipal water, wastewater, and solid waste services within the city. New development and redevelopment projects are required to comply with applicable City standards governing utility connections, capacity requirements, and service provision.

4.20.3.3.c. Fresno Metropolitan Flood Control District (FMFCD) Requirements

The FMFCD is responsible for regional stormwater management facilities within the Fresno-Clovis metropolitan area. Development and redevelopment projects within the District's service area must comply with FMFCD requirements regarding stormwater retention, drainage facilities, and runoff management to ensure adequate drainage capacity and protection from localized flooding.

4.20.3.3.d. Pacific Gas and Electric Company (PG&E)

Electrical and natural gas services to the project site is provided by Pacific Gas and Electric Company (PG&E). New facilities and improvements requiring utility service must comply with PG&E design, connection, and infrastructure requirements.

4.20.4 Impact Analysis

4.20.4.1 Thresholds of Significance

The thresholds for determining the significance of impacts for this analysis of utilities and service systems are based on the environmental checklist in the State CEQA Guidelines, as amended. The project would have a significant impact on utilities and service systems if it would:

- Exceed wastewater treatment requirements of the applicable RWQCB;
- require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which would cause significant environmental effects;
- require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects;
- have insufficient water supplies available to serve the project from existing entitlements and resources, or need new or expanded entitlements;
- fail to 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 demands in addition to the provider’s existing commitments;
- be served by a landfill without sufficient permitted capacity to accommodate the project’s solid waste disposal needs; or
- fail to comply with federal, State, and local statutes and regulations related to solid waste.

4.20.4.2 Methodology

Analysis of the project's potential impacts was based on an evaluation of the project's compliance with Central Valley RWQCB requirements, the capacity of the County of Fresno's American Avenue Landfill, the City's water supply, and the capacity of the Fresno-Clovis Regional Wastewater Reclamation Facility.

4.20.4.3 Impacts and Mitigation Measures

4.20.4.3.a. Impact UTIL-A:

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

Less than Significant Impact

Water and Wastewater:
The project would continue to be served by City of Fresno water and sewer public utilities. The proposed reconfigured campus may result in relocated service connections, which would be reviewed and approved by the City of Fresno. Existing service connections that would stay in place would also be reviewed and approved by the City of Fresno to ensure that service connections are constructed to City of Fresno standards.

During a preliminary Development Review Committee (DRC) meeting with the City of Fresno, Department of Public Utilities staff made preliminary comments that the existing water main under Jensen Avenue is old and may require replacement as a condition of approval of the project. The replacement of a water main under Jensen Avenue, or any water/sewer main under any street surrounding the project site, would not be located in a sensitive environment and there are no identified hazardous waste sites located at the streets surrounding the project site pursuant to Section 65925.5. The proposed project would have a **less than significant impact**.

Stormwater:
FMFCD would review proposed site development plans to ensure they meet the FMFCD Master Drainage Plan and Stormwater Design standards, ensuring that stormwater facilities have enough capacity from the runoff of the redesigned campus. Therefore, the proposed project would have a **less than significant impact**.

Electrical Energy and telecommunications:
Electrical energy and telecommunications are currently provided by PG&E via overhead electrical power lines that span along Jensen Avenue and Cedar Avenue that connect to the school via underground connections. The redeveloped campus would continue to be served by existing overhead electrical and telecommunication lines. Since the project would not expand use of the campus, expansion of electrical or telecommunication lines would not be necessary.

If undergrounding of existing electrical, or if telecommunication lines would be required to be undergrounded as a condition of approval of the project, this relocation along Jensen Avenue or Cedar Avenue would not be located in a sensitive environment and there are no identified hazardous waste sites located at the streets surrounding the project site pursuant to Section 65925.5. The proposed project would have a **less than significant impact**.

Natural Gas:

Per the discussion in Section 4.9 Greenhouse Gases, the proposed project would implement Mitigation Measure GHG-1, where the use of natural gas for the redeveloped campus would be avoided. Therefore, the project would

not significantly increase the use of natural gas where new off-site infrastructure would need to be constructed. Therefore, the proposed project would have **no impact**.

As discussed above, the project would not significantly increase the demand of any off-site utility infrastructure to require the expansion of off-site utility infrastructure. Any off-site utility improvements would be within the streets immediately surrounding the project site, which does not include any sensitive environmental areas or hazardous waste sites. Therefore, this impact would be **less than significant.**

4.20.4.3.b. Impact UTIL-B:

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

No Impact
The project site's potable water needs would continue to be served by the City of Fresno. The redeveloped campus would implement water efficient landscaping, appliances, and fixtures that would result in greater water efficiency than the existing campus. The proposed project would have **no impact**.

4.20.4.3.c. Impact UTIL-C:

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

No Impact
The project site would continue to be served by the City of Fresno for wastewater disposal. The redeveloped campus would implement water efficient appliances and fixtures that would result in greater water efficiency, which would also result in less wastewater output compared to the existing campus. The proposed project would have **no impact**.

4.20.4.3.d. Impact UTIL-D:

Would the project generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

No Impact
The proposed project consists of a redevelopment of school site with no planned increase in student enrollment above existing levels. As such, the proposed project's generated solid waste would not change from existing amounts and would therefore not exceed the capacity of local infrastructure. The District would implement California SB 1383, which requires labeled waste containers trash, recyclables, and organic waste in all areas and donate excess edible food from cafeteria services that would otherwise be discarded to a food recovery organization. Additionally, the District would comply with local requirements to reduce solid waste. Therefore, the proposed project would not exceed solid waste generation in excess of state or local standards. The proposed project would have **no impact**.

4.20.4.3.e. Impact UTIL-E:

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

No Impact

Solid waste disposal would continue to be provided by the City of Fresno. Redesigned solid waste container collection areas would comply with City of Fresno solid waste requirements. And as discussed previously, the proposed project would implement California SB 1383 requirements. The proposed project would have **no impact**.

4.21 Wildfire

4.21.1 Introduction

This section describes the existing environmental and regulatory setting of the project area and analyzes the potential impacts of the project on wildfire. This section also describes the criteria for determining the significance of impacts, approach to assessing impacts, and possible mitigation measures.

4.21.2 Environmental Setting

According to the Fire Hazard Severity Zones map provided by Cal Fire, the project site is not located in a State Responsibility Area or in an area identified as having a Fire Hazard Severity Zone (Cal-Fire, 2025). The nearest wildfire severity zones are located approximately 10 miles to the north, and the nearest State Responsibility Area is located approximately 13 miles to the northeast. Furthermore, the project is not located near any geographic features or land uses that would contribute to wildfire risk such as slopes or vacant properties.

4.21.3 Regulatory Setting

4.21.3.1 Federal Laws, Regulations, and Policies

No federal laws, regulations, or policies related to utilities and service systems apply to the project.

4.21.3.2 State Laws, Regulations, and Policies

4.21.3.2.a. California Public Resources Code Sections 4290 and 4291

California Public Resources Code (PRC) Sections 4290 and 4291 establish fire safety standards intended to reduce wildfire risks in State Responsibility Areas (SRAs) and designated Fire Hazard Severity Zones. PRC Section 4290 requires minimum fire safety standards for development, including emergency access, water supply, fuel modification, and defensible space requirements. PRC Section 4291 requires the maintenance of defensible space around structures to reduce the potential for structure ignition during wildfire events

4.21.3.2.b. California Building Standards Code

The California Building Standards Code (Title 24) includes wildfire protection requirements for development within Wildland-Urban Interface (WUI) areas and Fire Hazard Severity Zones. These standards establish construction requirements intended to reduce building vulnerability to wildfire exposure, including the intrusion of flames and windborne embers.

4.21.3.2.c. California Environmental Quality Act (CEQA)

Appendix G of the CEQA Guidelines requires evaluation of whether a project would impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, expose people or structures to significant risks associated with wildland fires, or exacerbate wildfire hazards due to slope, winds, or other environmental conditions. CEQA also requires consideration of whether a project could require the installation or expansion of infrastructure that may increase wildfire risk.

4.21.3.3 Local Laws, Regulations, and Polices

4.21.3.3.a. Fresno County Multi-Jurisdictional Hazard Mitigation Plan

The Fresno County Multi-Jurisdictional Hazard Mitigation Plan identifies wildfire as a potential hazard within portions of Fresno County and establishes goals and actions intended to reduce risks to life, property, and infrastructure. The plan provides a framework for hazard mitigation, emergency preparedness, and coordination among local agencies (County of Fresno, 2018).

4.21.3.3.b. City of Fresno General Plan

The City of Fresno General Plan includes policies that support public safety, emergency preparedness, and coordination with fire protection agencies. These policies are intended to minimize risks associated with natural hazards, including wildfire, and to ensure that new development does not adversely affect emergency access or response capabilities (City of Fresno, 2014).

4.21.4 Impact Analysis

4.21.4.1 Thresholds of Significance

The thresholds for determining the significance of impacts for this analysis of wildfire risks are based on the environmental checklist in the State CEQA Guidelines, as amended. The project would have a significant impact on utilities and service systems if it would:

- Substantially impair an adopted emergency response plan or emergency evacuation plan;
- due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from wildfire or the uncontrolled spread of wildfire;
- 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;
- expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

4.21.4.2 Methodology

Analysis of the project's potential impacts was based on an evaluation of the project's location and proximity to designated fire hazard zones and proximity to wildfire-prone geographic features such as slopes.

4.21.4.3 Impacts and Mitigation Measures

4.21.4.3.a. Impact FIRE-A:

Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

No Impact
The project is not located in or near state responsibility areas or lands classified as very high hazard severity zones. Therefore, the project would have **no impact**.

4.21.4.3.b.Impact FIRE-B:

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

No Impact

The project is not located near any slopes, or other factors, that would exacerbate wildfire risks. Furthermore, the project site is not located near any wildlife prone areas that would expose students, staff, or visitors to the uncontrolled spread of wildfire. Nor would occupants be exposed to pollutant concentrations from wildfire aside from the general exposure to wildfire pollutants associated with the Central Valley. Therefore, the proposed project would have **no impact**.

4.21.4.3.c.Impact FIRE-C:

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

No Impact

The project would not require the installation or maintenance of any infrastructure that may exacerbate fire risk or result in ongoing impacts to the environment. Therefore, the proposed project would have **no impact**.

4.21.4.3.d.Impact FIRE-D:

Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

No Impact

The project is not at risk of wildfire, nor is it located near any wildfire hazard areas such that it would be at risk of any downstream/downslope effects after wildfires. Therefore, the proposed project would have **no impact**.

Chapter 5 Other CEQA Requirements

5.0 Cumulative Impacts

5.0.1 Introduction

This section evaluates the cumulative environmental impacts associated with the Proposed Project in accordance with CEQA Guidelines Sections 15130 and 151355 . Cumulative impact is defined in Section 15355 as two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts and when viewed in connection with past, present, and future projects.

5.0.2 Cumulative Setting and Methodology

The cumulative setting consists of the regional and local environmental conditions within which project-related effects would occur, including:

- The City of Fresno and surrounding urbanized area;
- The San Joaquin Valley Air Basin (SJVAB) for air quality;
- The South-Central Fresno AB 617 Community for environmental justice considerations related to air quality;
- The global nature of climate change and related statewide objectives related to greenhouse gases; and
- The broader regional inventory of historic resources.

This analysis uses the list approach under CEQA Guidelines §15130(b)(1)(A) and incorporates:

- Ongoing school modernization projects within FUSD;
- Local and regional urban development and infrastructure projects; and
- Existing baseline environmental conditions.

Topics Requiring Detailed Analysis

5.1 Air Quality

As described in Section 4.1 the proposed project lies within the SJVAB. The basin is in nonattainment for ozone and particulate matter, and air quality impacts are inherently cumulative due to regional pollutant formation and shared emissions sources. The project site is also located in an AB 617 Community, where elevated cumulative burdens exist. As discussed in Section 4.3.3.3.b, AB 617 community air protection strategies emphasize reducing near-source exposure through measures such as truck-routing improvements, vegetative barriers, and enhanced building filtration. These localized exposure-reduction actions complement regional emission-control programs and are increasingly relevant in project-level CEQA analysis. In particular, they provide important context for evaluating sensitive receptors, localized health risks, and cumulative air-quality impacts, especially in communities identified as disproportionately burdened by air pollution.

Construction and operational emissions are required to meet the SJVAPCD significance thresholds. Construction-related emissions would be short term and temporary. The capacity or enrollment of the numbers of students and associated operational air emissions would not increase. Because the proposed project is required to implement mitigation measures AQ-1 and AQ-2 the project's incremental contribution to cumulative impacts would not be

cumulatively considerable; therefore, cumulative impacts would be **less than significant with mitigation incorporated.**

5.2 Historic Architectural Resources

Cumulative impacts to historical resources occur through the incremental loss of buildings, structures, sites, districts, and other resources that qualify as historical resources under CEQA. Such impacts may occur when past, present, and reasonably foreseeable future projects collectively reduce the number, integrity, or availability of historical resources within a community or region.

The proposed project would demolish Building G (Multipurpose Room), which has been determined by the District to qualify as a historical resource. As discussed in Section 4.2, demolition of the MPR (Building G) would result in a substantial adverse change to a historical resource and would constitute a significant impact. Therefore, the project would contribute to the cumulative loss of a historic educational facility within Fresno Unified School District and the broader Fresno-Clovis metropolitan area.

Fresno Unified School District is the largest school district in the region and is responsible for the stewardship of numerous historic-era school facilities. The District regularly undertakes campus modernization, replacement, and redevelopment projects to address aging facilities and changing educational needs. Such projects have the potential to affect historical resources when historic-era buildings are modified or demolished. Consequently, ongoing and reasonably foreseeable District capital improvement projects contribute to the potential for cumulative impacts to historical resources.

Review of recent District projects indicates that impacts to historical resources have generally been avoided through project design or because historical resources were not present. For example, the Ventura Alternative Education Campus and Administrative Office Project identified two historically significant buildings that were preserved and adaptively reused. Similarly, the District's near-term Measure H modernization projects at Addams, Ericson, Del Mar, Birney, and Norseman Elementary Schools have undergone or are undergoing cultural resource review. Where permanent building replacement is proposed, historical resource evaluations have determined that the buildings proposed for demolition do not qualify as historical resources. Therefore, those projects would not contribute to cumulative impacts on historical resources.

The proposed project would also demolish Classroom Buildings E and F, constructed in 1947, and portable buildings P11, P12, and P13. These buildings were evaluated by a qualified architectural historian and determined not to qualify as historical resources under CEQA. Therefore, demolition of these buildings would not result in an impact to historical resources and would not contribute to cumulatively considerable impacts on historical resources.

The proposed project would retain three historical resources on the campus, including Building J (Library) and Classroom Buildings C and D. Retention of these resources would preserve important aspects of the historic campus character while allowing modernization of the school. In addition, Mitigation Measures HIST-1 through HIST-7 would reduce the severity of impacts by documenting the MPR, preserving historical information and archival materials, and providing interpretation of the site's history through commemorative displays and public records. However, these measures would not avoid demolition of the historical resource and would not reduce the project impact to a less-than-significant level.

Although the project would contribute to the cumulative loss of historical resources through demolition of the MPR, available information indicates that other recent and foreseeable District projects have generally avoided impacts to historical resources or involve buildings that do not qualify as historical resources. Furthermore, the project would retain the majority of the campus's identified historical resources. Nevertheless, because demolition

of the MPR would permanently remove a historical resource, the project's contribution to cumulative impacts on historical resources would be cumulatively considerable.

Therefore, the project would make a cumulatively considerable contribution to cumulative impacts on historical resources. This impact would be **significant and unavoidable**, even with implementation of Mitigation Measures HIST-1 through HIST-7.

5.3 Hazards

This discussion evaluates local and regional cumulative impacts within the proposed project vicinity, the Fresno Unified School District service area, and the San Joaquin Valley Air Basin (SJVAB). The analysis considers the potential for cumulative impacts related to: (1) the transportation, use, and disposal of hazardous materials; (2) accidental releases and hazardous materials incidents; (3) hazardous emissions; and (4) interference with emergency response plans and evacuation routes.

The routine transport, use, and disposal of hazardous materials would occur during both project construction and operation. As discussed in Section 4.3, hazardous materials would be used during construction; however, these activities would be temporary in nature. Compliance with applicable federal, state, and local regulations governing the transport, storage, use, and disposal of hazardous materials would ensure that construction-related activities would not result in a cumulatively considerable contribution to hazardous materials impacts. In addition, because construction activities are temporary, they would cease upon project completion and would not contribute to long-term cumulative impacts.

During operation, the transport, use, and disposal of hazardous materials would remain substantially similar to existing conditions because the project site currently operates as a school and the proposed project would continue the site's educational use. As such, operational activities would not substantially increase the type, quantity, or frequency of hazardous material use beyond existing levels. Therefore, the project would not result in a cumulatively considerable impact related to the routine transport, use, or disposal of hazardous materials.

Older school facilities requiring modernization, such as the proposed project, may involve the disturbance and removal of asbestos-containing materials (ACMs), lead-containing building materials, or lead-contaminated soils. Accordingly, similar modernization projects could contribute to a cumulatively significant impact related to hazardous materials upsets during construction. However, such impacts would be localized to the immediate project vicinity and temporary in duration. Potential exposure would most likely occur during demolition, excavation, or grading activities and would primarily affect construction workers or individuals in the vicinity of the project site.

The proposed project would comply with all applicable federal, state, and regional regulations governing the identification, handling, removal, transport, and disposal of ACMs and lead-containing materials. Compliance with these requirements would minimize or eliminate the potential for hazardous materials exposure during construction. In addition, the project would implement Mitigation Measure HAZ-1, Lead-Containing Soil Abatement and Management, which would ensure that lead-contaminated soils are either removed from the site or properly managed to prevent future exposure.

Because ACMs, lead-containing materials, and lead-contaminated soils would be remediated as part of project implementation, the potential for future hazardous materials upsets at the site would be substantially reduced. As similar modernization projects are completed and hazardous materials are removed from older facilities, the overall cumulative risk associated with construction-related hazardous material upsets would decrease over time.

Therefore, the project's contribution to cumulative impacts related to hazardous material upsets and accidental releases would not be cumulatively considerable.

Hazardous emissions could contribute to cumulatively significant impacts when considered in conjunction with other school modernization projects similar to the proposed project. However, as discussed in Section 4.1, Air Quality, and Section 6.1, Air Quality (Cumulative Impacts), the proposed project's modeled unmitigated emissions would remain below the San Joaquin Valley Air Pollution Control District (SJVAPCD) thresholds of significance. Accordingly, project-related construction and operational emissions would be less than significant and would not represent a cumulatively considerable contribution to regional air quality impacts.

In addition, implementation of Mitigation Measure AQ-1, Use of Tier 4 Final (or Cleaner) Construction Equipment, and Mitigation Measure AQ-2, Heavy-Duty Vehicle and Equipment Anti-Idling Requirements, would further reduce construction-related emissions. These measures would ensure consistency with the South Central Fresno Community Emissions Reduction Program (CERP), which was developed to reduce air pollution exposure in the project area. Compliance with the South Central Fresno CERP would further reduce the project's contribution to cumulative air quality impacts. Therefore, the proposed project's contribution to cumulative impacts associated with hazardous emissions would not be cumulatively considerable

The proposed project could temporarily affect emergency response plans and evacuation routes during construction, as discussed in Section 4.3, due to the potential need for work within adjacent roadways. However, the project would comply with all applicable conditions of encroachment permits issued by the City of Fresno, including measures designed to minimize disruptions to traffic circulation and maintain access along affected roadways.

While multiple concurrent projects within the region could potentially result in roadway closures that collectively affect emergency access, the City of Fresno coordinates roadway closures and traffic management activities to maintain adequate emergency vehicle access and public circulation throughout the area. Through this coordination and implementation of permit requirements, the proposed project's temporary construction-related traffic disruptions would not substantially contribute to any cumulative impacts on emergency response services or evacuation routes. Therefore, the proposed project would not result in a cumulatively considerable impact related to emergency response plans or evacuation routes.

Compliance with applicable local, state, and federal regulations; consistency with local and regional air quality planning efforts; and implementation of Mitigation Measures HAZ-1, AQ-1, and AQ-2 would reduce the proposed project's contribution to cumulative hazardous materials and air quality impacts. These measures would minimize or avoid potential impacts associated with hazardous materials management, accidental releases, hazardous emissions, and construction-related activities that could affect nearby sensitive receptors.

As discussed above, the project's impacts would be either temporary and localized, consistent with existing site uses, or reduced through compliance with regulatory requirements and implementation of mitigation measures. Accordingly, with mitigation incorporated, the proposed project's incremental contribution to cumulative impacts would not be cumulatively considerable. Therefore, cumulative impacts would be **less than significant with mitigation incorporated.**

Topics That Require Moderate Level of Analysis

The following discussion addresses Aesthetics, Biological Resources, Archaeological Resources, Energy and Energy Resources, Geology and Soils, Greenhouse Gases, Hydrology and Water Quality, Noise and Groundborne Vibrations, Transportation, and Tribal Cultural Resources which were evaluated and found to have significant impacts that will be avoided, reduced or minimized through mitigation measures.

5.4 Aesthetics

As described in Section 4.4, Aesthetics, the project site is not located within a scenic vista, does not contain a state-designated scenic highway, and is not visible from an eligible scenic highway. The proposed project would alter the visual character of the campus through demolition of existing buildings, construction of new educational facilities, and development of new parking areas in the northwestern and southeastern portions of the campus. Similar modernization and redevelopment projects are occurring throughout the Fresno-Clovis metropolitan area as aging school facilities are renovated, replaced, or expanded to meet current educational needs.

The project would remove the existing Multipurpose Room (MPR), which has been determined eligible for listing in the CRHR. Demolition of the MPR would constitute a significant and unavoidable impact to historical resources; however, the replacement MPR would be constructed on campus and would be designed as a visually prominent campus feature that is compatible with the overall campus setting. Mitigation Measure HIST-2 would require evaluation of opportunities to incorporate architectural elements of the existing MPR into the replacement building, including, where feasible, the use of similar materials, brick detailing, colors, textures, and architectural features reflective of the original mid-century modern design.

Modernization activities involving historically significant Buildings C, D, and J also have the potential to affect visual characteristics associated with the historic campus environment. However, implementation of Mitigation Measures HIST-8 through HIST-14 would ensure that rehabilitation and modernization activities are conducted in a manner that preserves character-defining features and maintains the visual qualities of these historic buildings. Furthe As a result, impacts to the visual character of these resources would be reduced to a less than significant level.

Although the project would alter the appearance of the campus, the project would not substantially degrade a scenic vista, damage scenic resources, or substantially degrade the overall visual character or quality of the surrounding area. The project would replace aging facilities with modern educational buildings designed for long-term campus use and would remain visually compatible with surrounding institutional, residential, and urban development patterns. Consequently, the project's contribution to cumulative aesthetic impacts would not be cumulatively considerable. Therefore, he project's incremental contribution to cumulative impacts would not be cumulatively considerable; therefore, cumulative impacts would be **less than significant with mitigation incorporated.**

5.5 Biological Resources

This discussion would consider regional and Statewide cumulative impacts to biological resources by similar projects as the proposed project. The proposed project involves the redevelopment of an existing school site within the valley floor of Fresno County in the City of Fresno, where the existing site is fully developed. Similar sites lack important biological resources as these sites would be covered by buildings, concrete, asphalt, and landscape improvements that include ornamental landscaping and grassy turf playfields. As such, biological resources such as wetlands, riparian areas, sensitive natural communities, migratory corridors, and special status species (aside from

birds) would not be impacted by similar projects and should not be considered in this cumulative impact analysis. However, the project may potentially contribute a cumulatively considerable impact to nesting birds.

Construction activity generally impacts birds by disturbing nesting activity, potentially impairing bird reproduction and impacting bird populations. Reduced bird populations may be considered a regional or Statewide impact if the impacted birds migrate between the project's vicinity and other regions in the State. Similar projects would likely involve the disturbance of nesting birds if construction begins and/or continues during the nesting bird season (February – September). Implementing Mitigation Measure BIO-1 Nesting Bird Avoidance and Minimization, however, would reduce impacts to nesting birds to less than significantly, allowing the birds an opportunity to continue nesting and preventing impacts to bird populations. Therefore, The project's incremental contribution to cumulative impacts would not be cumulatively considerable; therefore, cumulative impacts would be **less than significant with mitigation incorporated.**

5.6 Archaeological Resources

As described in Section 4.6, *Archaeological Resources*, record searches and existing data indicate that no previously recorded archaeological resources are present within the project site. The cumulative impact area has been extensively disturbed during the historic period through agricultural land use and urbanization, reducing the likelihood that intact archaeological deposits remain within the area.

No known human remains or formal cemeteries have been identified within the cumulative impact area.

The potential for disturbance of human remains is site-specific, such that the disturbance of remains at one site is generally not considered additive at another site. While cumulative development has the potential to uncover unidentified human remains, all construction activities would be subject to Mitigation Measure ARC-1 and ARC-2. If the remains are determined to be of Native American origin. Therefore, the project's incremental contribution to cumulative impacts would not be cumulatively considerable; therefore, cumulative impacts would be **less than significant with mitigation incorporated.**

5.7 Energy and Energy Resources

As described in Section 4.7, *energy and energy resources,* energy consumption would occur during construction of the proposed project, including fuel use associated with the on-site operation of off-road equipment and vehicles traveling to and from the construction site. Energy use associated with construction/modernization of the proposed facilities would be temporary and would not be expected to result in the need for additional capacity, nor would construction be anticipated to result in increased peak-period demands for electricity.

The State of California's Energy Efficiency Strategic Plan establishes a goal for the development of buildings with net zero energy consumption. This plan includes goals for the construction of new residential, commercial, and government buildings (such as schools). Adherence to current and future Title 24 energy requirements would require the installation of PV systems and an energy storage system to help to reduce the project's building-use energy consumption. The District would ensure operational energy consumption would be substantially reduced beyond those required by Title 24 building energy-efficiency requirements. Accordingly, the project's incremental contribution to cumulative impacts would not be cumulatively considerable; therefore, cumulative impacts would be **less than significant.**

5.8 Geology and Soils

Cumulative geology, soils, and paleontological resource impacts could occur if multiple projects within the region collectively expose people or structures to geologic hazards, increase erosion, destabilize soils, or result in the loss of paleontological resources. As discussed in Section 4.8 *Geology and Soils*, the project site is not located within an earthquake fault zone, landslide hazard zone, or liquefaction hazard zone; would comply with applicable building and engineering standards; would implement erosion control measures required by the Construction General Permit; and would connect to existing municipal sewer infrastructure. In addition, Mitigation Measure GEO-1 would reduce potential impacts to inadvertent discoveries of paleontological resources to a less than significant level. Therefore, the project's incremental contribution to cumulative impacts would not be cumulatively considerable; therefore, cumulative impacts would be **less than significant with mitigation incorporated.**

5.9 Greenhouse Gases

Climate change is a global phenomenon resulting from the accumulation of greenhouse gas (GHG) emissions in Earth's atmosphere from numerous sources worldwide. Therefore, the geographic scope for cumulative GHG impacts is global in nature. A project's incremental contribution to cumulative climate change impacts is evaluated based on whether the project would conflict with applicable plans, policies, or regulations adopted for the purpose of reducing statewide and/or regional GHG emissions.

As discussed in Section 4.9.4 *Greenhouse Gas Emission*, the proposed project would generate both construction-related and operational GHG emissions. However, the project would modernize an existing school campus and would not increase student enrollment, student capacity, staffing levels, or VMT. Furthermore, the project would be designed and constructed in accordance with applicable State building efficiency requirements and would incorporate energy-efficient building systems and equipment.

Implementation of Mitigation Measure GHG-1: Building Electrification and Reduction of Natural Gas Use, would further reduce operational GHG emissions by prioritizing building electrification and limiting the installation of natural gas infrastructure and appliances to the extent feasible. With implementation of Mitigation Measure GHG-1, the project would be consistent with applicable greenhouse gas reduction strategies, including CARB's 2022 Climate Change Scoping Plan, the Fresno Council of Governments (FCOG) 2022 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), and the FCOG Priority Climate Action Plan.

Because the project would be consistent with applicable plans, policies, and regulations adopted to reduce greenhouse gas emissions, the project would not make a cumulatively considerable contribution to global climate change. Therefore, the project's incremental contribution to cumulative impacts would not be cumulatively considerable; therefore, cumulative impacts would be **less than significant with mitigation incorporated.**

5.10 Hydrology and Water Quality

Cumulative hydrology and water quality impacts could occur if multiple projects within the region collectively degrade water quality, increase groundwater demand, exceed storm drainage system capacity, or interfere with implementation of water quality control plans and sustainable groundwater management plans. The proposed project is the redevelopment of an existing school campus and would comply with applicable Federal, State, and local regulations governing stormwater quality, drainage, groundwater management, and water use efficiency. The project would implement required construction and operational best management practices, comply with FMFCD drainage requirements, and continue to receive water service from the City of Fresno. As discussed in Section 4.10 *Hydrology and Water Quality*, the project would result in less than significant or no impacts related to water quality, groundwater resources, drainage patterns, flooding, and applicable water management plans. Therefore,

the project would not make a cumulatively considerable contribution to any cumulative hydrology or water quality impact. Cumulative impacts would be **less than significant.**

5.11 Noise and Groundborne Vibrations

Cumulative noise and groundborne vibration impacts are generally localized in nature because noise and vibration attenuate rapidly with distance from their source. Construction-related noise and vibration impacts are temporary, intermittent, and limited to the immediate vicinity of active construction areas. In addition, the proposed project would not increase the long-term operational noise environment because the site would continue to operate as an elementary school with no increase in student capacity.

The proposed project would generate temporary construction-related noise and groundborne vibration. However, similar redevelopment and modernization projects within the Fresno Unified School District and the greater Fresno-Clovis metropolitan area are geographically dispersed and would not be expected to occur in close enough proximity to combine with project-generated noise and vibration in a manner that would create a cumulatively significant noise environment. As a result, noise and vibration impacts from individual projects would remain localized to their respective construction areas.

In addition, implementation of Mitigation Measure NOISE-1, *Construction Noise Control and Compliance*, and Mitigation Measure NOISE-2, *Minimize Usage of Vibratory Rollers and Large Equipment Near Buildings*, would reduce construction-related noise and vibration impacts to less-than-significant levels. These measures would minimize noise generation, reduce vibration exposure at nearby sensitive receptors, and ensure compliance with applicable noise control requirements. Therefore, the proposed project's contribution to cumulative noise and vibration impacts would not be cumulatively considerable, and cumulative impacts would be less than significant.

School modernization and redevelopment projects within the District may occur at campuses containing historical buildings. As discussed in Section 4.11, construction-generated vibration has the potential to affect nearby historical structures. However, implementation of Mitigation Measure NOISE-2 would minimize vibration exposure to on-site historical buildings and reduce the project's contribution to any cumulative vibration impacts affecting historic structures.

Considering the localized and temporary nature of construction noise and vibration, the separation between similar redevelopment projects, and implementation of Mitigation Measures NOISE-1 and NOISE-2, the proposed project's contribution to cumulative noise and groundborne vibration impacts would not be cumulatively considerable. Therefore, the project's incremental contribution to cumulative impacts would not be cumulatively considerable; therefore, cumulative impacts would be **less than significant with mitigation incorporated.**

5.12 Transportation

The geographic scope for cumulative transportation impacts includes roadway, pedestrian, bicycle, and transit facilities serving the project area and the surrounding City of Fresno and Fresno County transportation network. Cumulative transportation impacts may result from the combined effects of regional growth, planned development, and transportation infrastructure improvements.

As discussed in Section 4.12 *Transportation*, the proposed project would modernize an existing school campus and would not increase student enrollment, student capacity, staffing levels, or transportation demand. Accordingly, the project would not generate additional vehicle trips or vehicle miles traveled (VMT) and would not contribute to

a cumulative increase in roadway congestion or VMT-related impacts. In addition, the project would not impair emergency access or introduce roadway design features that would create hazardous conditions.

The project could contribute to localized conflicts between vehicles, pedestrians, and bicyclists in the vicinity of campus access points during student drop-off and pick-up periods. Similar conditions may occur in combination with other development projects in the surrounding area. However, implementation of Mitigation Measure TRAN-1 requires coordination with the City to identify and incorporate appropriate traffic safety improvements and pedestrian safety measures. With implementation of Mitigation Measure TRAN-1, the project's contribution to cumulative transportation safety impacts would not be cumulatively considerable.

Therefore, the project's incremental contribution to cumulative impacts would not be cumulatively considerable; therefore, cumulative impacts would be **less than significant with mitigation incorporated.**

5.13 Tribal Cultural Resources

As described in Section 4.13 *Tribal Cultural Resources*, no identified tribal cultural resources are present within the proposed project site. Within the cumulative impact study area, the nearest federally recognized Native American tribal land is the Table Mountain Rancheria, located near Friant, California, northeast of Fresno. The Table Mountain Rancheria is a federally recognized tribe comprised of members of the Chukchansi Band of Yokuts and the Monache people. Other nearby tribal lands include the Big Sandy Rancheria near Auberry, California, and the Santa Rosa Rancheria (Tachi Yokut Tribe) near Lemoore, California.

No comments were received from California Native American Tribes traditionally and culturally affiliated with the project area during the consultation process.

Additionally, there are no known tribal cultural resources eligible for listing in the California Register of Historical Resources (CRHR) within the project site. There are also no resources listed in a local register of historical resources.

Despite there being no evidence of tribal cultural resources at the project site, there still remains the potential for inadvertent discoveries of unknown tribal cultural resources during construction activities which could result in a significant impact. Therefore, mitigation measure TC-1, Inadvertent Tribal Cultural Resources Discovery would be incorporated into the project. Accordingly, the project's contribution to cumulative impact to tribal cultural resources would be **less than significant with mitigation incorporated.**

Topics That Require a Brief Level of Analysis

CEQA Guidelines Section 15128 requires a brief discussion of any potential environmental effects that were found not to be significant during preliminary review of a project pursuant to State CEQA Guidelines Section 15060 and, for this reason, are not analyzed in detail in the DEIR. An EIR shall contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and were therefore not discussed in detail in the DEIR.

The following discussion addresses Agriculture and Forestry Resources, Land Use and Planning, Mineral Resources, Population and Housing, Public Services, Recreation, Utilities and Service Systems which were evaluated and determined not to result in significant environmental effects.

5.14 Agriculture and Forestry Resources

As described in Section 4.14 there is no Prime Farmland, Unique Farmland, Farmland of Statewide Importance or Local Importance, forest lands timberlands or lands zoned for timberland production within the boundary of school campus accordingly cumulative development within the impact area would not result in the loss or conversion of farmland, forest land or conflict with forests or timberland zoning. Accordingly, the project's incremental contribution to cumulative impacts would not be cumulatively considerable; therefore, cumulative impacts would be **no impact.**

5.15 Land Use and Planning

As described in Section 4.15 *Land Use and Planning*, the proposed project site is surrounded by commercial and industrial development and urban residential uses. The proposed project would not introduce any features that would physically divide the community or restrict access in a manner that would impair mobility. The designated land use for the project site, according to the City of Fresno General Plan, is Public Facilities and is zoned Public and Institutional (PI). There is no conflict with land use plans, policies, or regulations. It would not physically divide an established community, or conflict with any applicable land use plan or policy. Cumulative development within the impact area would not divide an established community, or conflict with land use policies or regulations. Accordingly, the project's contribution to cumulative impact to land use and planning would have **no impact.**

5.16 Mineral Resources

As described in Section 4.16 *Mineral Resources*, the project would involve the redevelopment of an existing school where mineral extraction does not occur, and where mineral resources are not known to exist. Accordingly, the project's incremental contribution to cumulative impacts would not be cumulatively considerable; therefore, cumulative impacts would be **no impact.**

5.17 Population and Housing

As described in Section 4.17 *Population and Housing*, the project would involve the modernization of an existing school with no increase of capacity or enrollment. The setting around the campus is fully nearly fully built-out with residences and commercial/industrial areas. Accordingly, the project's incremental contribution to cumulative impacts would not be cumulatively considerable; therefore, cumulative impacts would be **no impact.**

5.18 Public Services

As described in Section 4.18 *Public Services*, Fire protection is provided by the City of Fresno Fire Department which currently serves the project site. The project would design facilities in accordance with Fresno Fire Department and Division of State Architects (DSA) standards, which would improve the existing facilities with up-to-date design that reduces the fire hazard at the project site.

Police protection is provided by the City of Fresno Police Department which currently serves the project site. Additionally, the District ensures that Student Resource Officers are able to assist with law enforcement on school campuses. The project would modernize the existing campus ensuring higher quality facilities and capacity for the Calwa Elementary School area. The project would provide improved recreational facilities for students and community members. All other services that are currently provided to the elementary school would continue to be provided.

Cumulative development within the impact area would not increase the need for public services. Accordingly, the project's incremental contribution to cumulative impacts would not be cumulatively considerable; therefore, cumulative impacts would be **less than significant.**

5.19 Recreation

As described in Section 4.19 *Recreation*, The project would include improvements to onsite recreational facilities for students. The project would not cause or induce any regional population growth that would impact recreational facility use. Accordingly, the project's incremental contribution to cumulative impacts would not be cumulatively considerable; therefore, cumulative impacts would be **less than significant.**

5.20 Utilities and Service Systems

As described in Section 4.20 *Utilities and Service Systems*, the school receives utility service from the City of Fresno (i.e., water, wastewater, and solid waste), the FMFCD (i.e., stormwater drainage), and PG&E (i.e., electricity and natural gas). No additional utilities would be required to service the campus. The proposed project would not induce an increase in demand on wastewater treatment, water supply, or solid waste. Accordingly, the project's incremental contribution to cumulative impacts would not be cumulatively considerable; therefore, cumulative impacts would be **less than significant.**

5.21 Wildfire

As described in Section 4.21 *Wildfire*, the project is not located near any slopes, or other factors that would exacerbate wildfire risks. Furthermore, the project site is not located near any wildlife prone areas that would expose students, staff, or visitors to the uncontrolled spread of wildfire. Nor would anyone be exposed to pollutant concentrations from wildfire aside from the general exposure to wildfire pollutants already associated with the Central Valley. Accordingly, the project's incremental contribution to cumulative impacts would not be cumulatively considerable; therefore, cumulative impacts would be **less than significant.**

5.22 Cumulative Impacts Conclusions

Consistent with CEQA Guidelines Section 15130, the cumulative impacts analysis identifies historic architectural resources as the only resource area for which the proposed project would make a cumulatively considerable contribution to a significant cumulative impact. Alternatives 1A and 1B would avoid this cumulative impact on historic resources. For all other environmental impact topics, the proposed project and all project alternatives would result in less-than-significant cumulative impacts.

Because the proposed project would result in a significant and unavoidable cumulative impact on historic architectural resources, approval of the proposed project would require adoption of a Statement of Overriding Considerations.

5.23 Growth-Inducing Impacts

Pursuant to CEQA Section 21100(b)(5) and Section 15126.2(e) of the State CEQA Guidelines, growth-inducing impacts should be assessed in terms of whether the project influences the rate, location, and amount of growth. Projects that remove obstacles to population growth, or that allow or encourage growth that would not have occurred if the project were not built, are considered growth-inducing. Potential growth-inducing impacts are also

assessed based on a project's consistency with adopted plans that have addressed growth management from a local and regional standpoint.

Growth-inducing policies include projects that would remove obstacles to population growth (for example, a major expansion of a wastewater treatment plant might allow for more construction in service areas). Population increases may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects. Also considered are characteristics of some projects that may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.

Section 15126.2(e) of the State CEQA Guidelines requires a discussion of how the potential growth-inducing impacts of the project could foster economic or population growth or the construction of additional housing, either directly or indirectly, in the surrounding environment. Induced growth is distinguished from the direct employment, population, or housing growth of a project. If a project has characteristics that "may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively," then these aspects of the project must be discussed as well. Induced growth is any growth that exceeds planned growth and results from new development that would not have taken place in the absence of the project. For example, a project could induce growth by lowering or removing barriers to growth or by creating or allowing a use, such as an industrial facility, that attracts new population or economic activity. The State CEQA Guidelines also indicate that the topic of growth should not be assumed to be either beneficial or detrimental.

The proposed project would not influence the rate, location, and amount of growth; would not foster economic or population growth; would not remove obstacles to population growth; and would not allow or encourage growth that otherwise would not have occurred if the project were not built. Therefore, the project would not be growth inducing. There would be **no impact**.

5.24 Significant Irreversible Environmental Effects

Section 15126.2(d) of the State CEQA Guidelines requires that an EIR address significant irreversible environmental effects that would occur if a project is implemented and cannot reasonable be undone.

Primary Impacts: Primary impacts of the project are analyzed in Chapter 4. As discussed in Chapter 4, demolition of the MPR would result in a significant and unavoidable impact on a historic architectural resource. This impact would be irreversible because demolition would permanently remove the resource, and its historical significance could not be restored through repair or reconstruction.

Secondary Impacts: Indirect effects of the proposed project are analyzed in Chapters 4 and 5 of this Draft EIR. The proposed project involves modernization of an existing elementary school campus and would not increase student capacity or change the nature or intensity of campus use. The project site is located within a largely built-out urban area surrounded by existing residential and industrial development. Accordingly, the proposed project would not induce population growth, facilitate development of undeveloped lands, or stimulate additional growth beyond that already anticipated under existing land use plans.

Long-term commitments of land and infrastructure: Calwa Elementary school was constructed on its present site in 1913. Over time, additional buildings and improvements were added to accommodate continued growth within the Calwa community. As of the date of this DEIR, there are no buildings at the site that pre-date 1945. All

permanent buildings at the campus were constructed between 1945-1970 or are temporary portable classroom additions. The project site includes all of the campus and surrounding road/sidewalk right-of-way. Land uses within approximately a 0.5-mile radius are predominately residential to the north, east, west, and southwest, with industrial uses located to the southeast. At a broader scale of 2.5-mile, the surrounding land use pattern transitions to more extensive industrial development to the south, southwest, and southeast. The proposed project would not encourage development or land use. The site is designated Public Facilities and will remain zoned as Public and Institutional and will continue to serve regional residences with public education services.

Irretrievable commitment of resources: Uses of nonrenewable resources (petroleum products and natural gas) during construction phases and operational/educational program activities may be irreversible. However, construction would be short-term and modernized campus buildings would comply with California Energy Code (Title 24, Part 6 of California Code of Regulations, California's Energy Efficiency Standards, and Green Building Standards), would offset through reduced energy demands.

Chapter 6 Alternatives

6.A Introduction

This chapter identifies and evaluates a reasonable range of project alternatives and analyzes the potential environmental impacts associated with each alternative. Each alternative is also evaluated based on its ability to attain the project objectives. Consistent with CEQA requirements, this analysis identifies the environmentally superior alternative and compares the alternatives based on both their environmental impacts and their ability to meet the project objectives.

6.A.a CEQA Requirements

The California Environmental Quality Act (CEQA) requires an Environmental Impact Report (EIR) to identify and evaluate a reasonable range of alternatives to the proposed project. Pursuant to CEQA Guidelines Section 15126.6, an EIR must describe alternatives that would feasibly attain most of the basic objectives of the project while avoiding or substantially lessening one or more of the project's significant environmental effects. The alternatives analysis is intended to foster informed decision-making and meaningful public participation by providing decision-makers and the public with information regarding potential options to reduce environmental impacts.

The discussion of alternatives must focus on alternatives capable of avoiding or substantially lessening significant environmental effects, even if such alternatives would impede attainment of some project objectives or be more costly. CEQA does not require evaluation of every conceivable alternative; rather, an EIR must consider a reasonable range of potentially feasible alternatives sufficient to permit a reasoned choice among options. The selection of alternatives is governed by the "rule of reason," and alternatives determined to be infeasible need not be analyzed in detail.

CEQA Guidelines Section 15126.6 also requires evaluation of a No Project Alternative and identification of the environmentally superior alternative. If the No Project Alternative is determined to be environmentally superior, the EIR must additionally identify the environmentally superior alternative from among the remaining action alternatives. The discussion of alternatives is not required to be as detailed as the analysis of the proposed project; however, it must include sufficient information to allow meaningful evaluation, comparison, and consideration by decision-makers.

6.A.b Alternatives Selection

This section describes the basis for determining the range of CEQA alternatives and identifies the specific alternatives that are analyzed in this EIR, consistent with CEQA Guidelines Section 15126.6.

6.A.c Project Objectives

As stated in Section 2.5 Project Description, the District has identified the following project objectives:

1. **Provide, Equitable, and Inclusive Educational Facilities**
   Upgrade or replace aging, obsolete buildings so students in a historically underserved community would have access to safe, equitable, ADA-complainant, and inclusive learning environments that support current instructional methods, technology integration, and long-term District educational goals.

2. **Improve Student Health, Safety, and Environmental Quality**
   Deliver facilities and site improvements that would meet current building, fire, accessibility, and environmental health standards; reduce exposure to environmental hazards; and incorporate AB 617 appropriate strategies to improve indoor environmental quality and promote student wellbeing.

3. **Enhance Campus Security and Operational Efficiency**
   Implement a modern campus layout that incorporates contemporary school safety design principles, specifically a single point of entry layout, and improves internal circulation, day-to-day operations, and campus functionality.

4. **Replace Inefficient Facilities to Reduce Long Term Costs**
   Remove deteriorated and inefficient buildings that no longer meet educational, energy, or infrastructure needs and replace them with durable, future ready facilities designed to reduce lifecycle operating, utility, and maintenance burdens.

5. **Maximize Cost Effectiveness and Efficient Use of Measure H Funds**
   Construct the project in a cost-effective manner while keeping students in session and safe. Maximize the District's ability to apply remaining Measure H funds to other campuses with substantial facility needs.

6.A.d Summary of Significant Impacts

CEQA Guidelines Section 15126.6(a), states that alternatives to a project selected for analysis in an EIR must substantially lessen or avoid any of the significant environmental impacts associated with the project.

In Chapter 4 of this DEIR, the only significant and unavoidable impact of the proposed project would be to historical resources. The project would demolish the existing Multipurpose Room (MPR/Building G), which has been determined to be historically significant. The alternatives selected for detailed analysis were developed to avoid demolition of the historic MPR because demolition of the MPR is the project's only significant and unavoidable impact.

6.A.e Summary of Alternatives

The District has identified the following alternatives for detailed analysis. Additional information on each alternative is presented later in this chapter.

4. **Alternative 1A: MPR Adaptive Reuse Alternative**

   Under this alternative, the existing MPR building would be retained and rehabilitated in place while preserving its historical significance and character-defining features. The building would be adaptively reused and renovated to accommodate administrative functions, such as visitor check-in, offices, and related support spaces. A new MPR would be constructed at a nearby location at the campus.

5. **Alternative 1B: MPR Rehabilitation Alternative**

   Under this alternative, the existing MPR building would be retained and rehabilitated in place while preserving its historical significance and character-defining features. Following rehabilitation, the building would continue to function as a multipurpose facility serving the school. A new administrative office would be constructed at a nearby location on the campus.

6. No Project Alternative

Under this alternative, the proposed project would not be implemented. The existing elementary school campus would continue to operate under existing conditions, and no major modernization, reconstruction, or demolition activities would occur.

6.A.f Alternatives Considered but Rejected

The following project alternatives were considered but determined not feasible and are therefore not evaluated in the EIR. A rationale for not evaluating these alternatives is also provided.

A. Leave MPR as-is; Modernize Remainder of Campus

Under this alternative, the existing MPR building would remain in its current condition, with no major improvements or rehabilitation. Modernization activities would occur elsewhere on campus, and funding that would otherwise be used for improvements to the MPR would be redirected to other school facilities. Because the historic MPR would be retained without substantial alteration, this alternative would avoid impacts to the historical resource.

This alternative was eliminated from further consideration because it would not meet several key project objectives. The existing MPR is in poor condition and requires substantial improvements to address deficiencies related to roofing, plumbing, HVAC systems, structural components, accessibility, and overall functionality. Leaving the building in its current condition would not address these deficiencies and would defer needed repairs and modernization improvements to a future date. Continued deterioration could also increase maintenance requirements, reduce building functionality, and result in higher future rehabilitation costs.

In addition, the MPR serves an important role in campus operations by providing space for student dining, assemblies, performances, and other school functions. Retaining the building without modernization would result in a campus that remains undersized for the student population and partially unimproved and would thereby not provide the level of safety, accessibility, functionality, and operational efficiency sought by the District.

Furthermore, this alternative would not eliminate the need for future action related to the MPR. Given the building's aging condition and identified deficiencies, substantial rehabilitation or replacement would likely still be required in the future to maintain the facility's functionality, safety, and compliance with applicable standards. As a result, this alternative would primarily defer, rather than avoid, the need for major improvements to the MPR. Delaying these improvements could allow building conditions to further deteriorate, potentially increasing the scope, cost, and complexity of future rehabilitation or replacement efforts.

Therefore, this alternative was determined to be infeasible because it would not adequately meet the facility needs that are central to the proposed project and would fail to meet most of the project's fundamental objectives.

B. Partial MPR Preservation and Expansion

This alternative would retain selected character-defining features of the historic MPR, such as primary exterior façades and other significant architectural features, while demolishing portions of the existing building and constructing new additions to expand the facility and accommodate campus needs.

This alternative was eliminated from further consideration because it would not avoid the significant impact to the historical resource. The MPR derives its significance from its architectural design and integrity as a cohesive example of Mid-Century Modern architecture. Demolition of portions of the building and construction of substantial additions would alter the building's original form, design, and architectural character, resulting in a loss of historical integrity. Consequently, this alternative would still result in a significant impact to historical resources and would not substantially lessen the project's primary environmental impact.

In addition, implementing substantial additions to a building constructed in 1947 would present significant design, engineering, and construction challenges. The existing structure requires extensive modernization and rehabilitation to address building systems, structural deficiencies, and other age-related issues. Integrating new construction with the existing building would likely require complex structural modifications and could substantially increase project costs relative to either complete rehabilitation of the historic building or demolition and reconstruction.

Because this alternative would not substantially reduce the significant impact to the historical resource and would introduce considerable technical and economic challenges, it was determined not to represent a reasonable or feasible alternative to the proposed project and was therefore not carried forward for detailed analysis.

C. MPR Preservation and New MPR Construction

Under this alternative, the existing historic MPR would be retained and preserved in place as a historic resource. Improvements would be limited to those necessary to stabilize the building and prevent further deterioration, such as structural repairs, roof replacement, weatherproofing, and other preservation measures. The building would not be rehabilitated or modernized for continued educational use. To meet the school's operational needs, a new multi-purpose room would be constructed elsewhere on campus.

This alternative was eliminated from further consideration because it would not efficiently meet the District's facility needs or project objectives. While retention of the historic MPR would avoid direct impacts to the historical resource, the building would no longer serve its intended educational function, and no replacement use was identified that would justify its continued occupancy and maintenance. As a result, the District would be required to construct a new MPR elsewhere on campus while simultaneously preserving and maintaining a historic structure with little or no ongoing operational value.

Given the limited size of the campus, construction of a new MPR would reduce land available for instructional, recreational, circulation, and support facilities and could constrain the overall campus layout. In addition, the District would incur costs associated with preserving, securing, and maintaining the historic building while also constructing and operating a replacement MPR. The District determined that the alternative would create a long-term maintenance obligation without providing a corresponding educational, administrative, or operational benefit.

Because this alternative would require construction of a replacement facility while retaining a building that would not meaningfully contribute to campus operations, the District determined that it would not represent

an efficient or cost-effective use of District resources. Accordingly, the alternative was determined to be operationally and economically infeasible and was not carried forward for detailed evaluation in this EIR.

D. MPR Relocation

Under this alternative, the historic MPR would be relocated to another location on or off campus rather than demolished. Following relocation, the building could be rehabilitated and reused for educational or other purposes.

This alternative was eliminated from further consideration because relocation of the MPR was determined to be infeasible. The building is a large masonry structure, making physical relocation technically challenging and costly. In addition, no suitable location exists on the campus to accommodate the relocated building without adversely affecting other school functions and facilities. Relocation would also diminish the historical integrity of the resource by removing it from its original location and setting. Therefore, this alternative was not carried forward for detailed analysis.

6.B Historic Building Rehabilitation Feasibility Analysis

A Historic Rehabilitation Feasibility Evaluation was prepared for the MPR by MGT Impact Solutions, LLC (MGT), a qualified school facility management consulting firm, and is included in Appendix H. The evaluation examined whether the existing 1947 MPR could be rehabilitated and retained as part of the campus modernization program in lieu of demolition and replacement under the proposed project. The study assessed the building's existing physical condition; structural, accessibility, and code compliance needs; educational suitability; operational performance; and lifecycle costs associated with rehabilitation and continued use of the building.

The evaluation concluded that rehabilitation and continued use of the MPR is technically feasible; however, substantial improvements would be required to address building deficiencies, meet current code and accessibility requirements, improve operational performance, and support contemporary educational needs. The report identifies the scope of work necessary to rehabilitate and retain the building, as well as the associated costs, constraints, and implementation considerations.

It should be noted that the feasibility evaluation did not include a detailed structural engineering analysis or assessment of the building's ability to comply with current California Building Code (CBC) seismic and structural design requirements. Although the study identified general building deficiencies and rehabilitation needs, it did not evaluate the existing structural system, determine the extent of seismic deficiencies, or identify specific structural upgrades that may be required to meet current code standards. Given the age of the building and the evolution of seismic design requirements since its original construction in 1947, it is reasonable to anticipate that structural improvements could be required as part of any rehabilitation program. Such improvements could include, but would not necessarily be limited to, seismic strengthening of the lateral-force-resisting system, upgrades to foundations or diaphragms, anchorage improvements, and other structural modifications identified through future engineering investigation.

Because demolition of the MPR is the only significant and unavoidable impact identified for the proposed project, the rehabilitation measures evaluated in the MGT report formed the basis of the historic-preservation alternatives evaluated in this chapter. The rehabilitation program identified in the report serves as the foundation for alternatives that would rehabilitate or adaptively reuse the historic MPR in lieu of demolition.

Based on the findings of the MGT evaluation, the District identified the following building deficiencies and rehabilitation measures that would be required to retain the MPR and continue its long-term use for school functions:

6.B.a Building Condition and Physical Deficiencies

The building exhibits substantial age-related deterioration and systemic obsolescence. Although the primary masonry structure remains generally intact, most major building systems have exceeded their useful life and would require replacement or substantial modernization. Key deficiencies include:

- End-of-life HVAC equipment.
- Original single-pane windows that are deteriorated and energy inefficient.
- Aging electrical and lighting systems.
- Original underground water and sewer infrastructure that has exceeded its service life.
- Worn flooring, ceilings, and interior finishes.
- Deteriorated kitchen fixtures and equipment.
- Drainage issues causing water to pond adjacent to the building foundation.
- Potential structural and seismic deficiencies associated with pre-modern code construction.

Rehabilitation would require comprehensive replacement of major mechanical, electrical, plumbing, life-safety, accessibility, and building envelope systems rather than limited repairs.

6.B.b Fire/Life Safety and Accessibility Constraints

The facility does not meet contemporary life-safety and accessibility standards. Existing deficiencies include:

- Partial sprinkler coverage is limited primarily to the stage area.
- Lack of emergency lighting and illuminated exit signage.
- Absence of a dedicated fire service water main capable of supporting a modern sprinkler system.
- Accessibility deficiencies related to circulation and restroom facilities.
- Potential code-triggered seismic upgrades.

Although some relief may be available under the California Historic Building Code, the study determined that extensive upgrades would still be required to support continued educational occupancy and achieve acceptable levels of safety and accessibility.

6.B.c Hazardous Materials

The MPR contains asbestos-containing materials in exterior stucco surfaces and lead-based paint on exterior and select interior building components, identified by a separate Hazardous Building Materials Survey Report prepared by FACS (2026) (as discussed in Section 4.3 *Hazards and Hazardous Materials*). Any rehabilitation effort involving repairs, upgrades, or modernization would require specialized abatement procedures and regulatory compliance, thereby increasing project complexity and cost.

6.B.d Educational Adequacy

Based on the District's review of the MGT Historic Rehabilitation Feasibility Evaluation and the experience of campus staff, the existing MPR does not adequately support contemporary educational programming. At approximately 6,322 square feet, the building was designed to accommodate enrollment levels, operational needs, and educational standards that differ substantially from those of the current campus.

The District found that the report identified several operational limitations associated with continued use of the existing facility, including:

- Insufficient assembly capacity for schoolwide events;
- Congested circulation during meal service;
- Limited staging and support space for performances;
- Inability to accommodate multiple simultaneous activities; and
- Reduced flexibility to support evolving educational and community needs.

Based on the information presented in the MGT evaluation, the District determined that, although the building could be rehabilitated and retained, its historic footprint and configuration would continue to constrain educational programming and operational flexibility. As a result, the rehabilitated facility would not fully meet the District's current and future program objectives.

6.B.e Administrative Reuse Alternative

The District also considered the option of repurposing the historic MPR as an administration facility while constructing a new multi-purpose building elsewhere on campus. Based on its review of the MGT evaluation, the District found that although this option would retain the historic structure, it would require substantial interior modifications to accommodate administrative functions, including:

- New office layouts and partitions;
- HVAC zoning modifications;
- Technology and communications upgrades; and
- Security and fire alarm improvements.

Based on the information presented in the MGT evaluation, the District determined that this option would increase rehabilitation and project costs, introduce operational inefficiencies associated with the building's original design and layout, and still necessitate construction of a new multi-purpose facility to meet the school's educational and programmatic needs.

6.B.f Financial and Lifecycle Considerations

The financial and lifecycle considerations for both alternatives are discussed below. It should be noted that these cost estimates do not include the potential costs associated with seismic or structural upgrades that may be required to achieve compliance with current California Building Code (CBC) requirements, as evaluation of the building's structural system and seismic performance was outside the scope of the analysis completed by MGT. Consequently, actual rehabilitation costs could be substantially greater than those presented herein if future structural investigations identify deficiencies requiring corrective measures.

Alternative 1B MPR Rehabilitation Alternative

Based on its review of the MGT evaluation, the District found that the estimated cost of Alternative 1B to rehabilitate the MPR to address identified deficiencies and retain its use as an MPR would be approximately $2.14 million. The evaluation also estimated the building's replacement value at approximately $3.6 million using Division of the State Architect (DSA) valuation methodologies, indicating that rehabilitation costs for Alternative 1B would equal approximately 60 percent of replacement value. The District determined that, despite this substantial investment, rehabilitation would not eliminate several inherent limitations associated with the historic building, including:

- Restricted floor area;
- Outdated spatial configuration;
- Lower energy efficiency;
- Reduced adaptability to future educational and operational needs;
- Continued maintenance demands associated with an aging historic structure; and
- Potential seismic upgrade requirements and other unknown conditions that could be identified during rehabilitation.

Alternative 1A MPR Adaptive Reuse Alternative

Additional cost estimates were developed by MGT for Alternative 1A, which would adaptively reuse the MPR building for administrative office space. The estimate includes costs associated with interior reconfiguration, HVAC system modifications and zoning, and enhanced electrical and technology infrastructure, while subtracting costs associated with new kitchen equipment that would no longer be required. From reviewing these estimates, the District found that Alternative 1A would cost approximately $4.14 million, indicating that rehabilitation and adaptive reuse costs would equal approximately 191.99% compared to the proposed new administration building.

The District determined that, despite this substantial investment, rehabilitation would not eliminate several inherent limitations associated with the historic building, including:

- More floor area than is necessary for administrative functions;
- Restrictive spatial configuration from retrofitting an MPR to an administration office;
- Lower energy efficiency;
- Reduced adaptability to future administrative and education support needs;
- Continued maintenance demands associated with an aging historic structure; and
- Potential seismic upgrade requirements and other unknown conditions that could be identified during rehabilitation.

For both alternatives, the District determined that replacement construction would provide greater long-term educational functionality or administrative/educational support functionality, operational functionality, improved code compliance, enhanced energy performance, increased flexibility to accommodate future needs, and reduced lifecycle maintenance demands compared to rehabilitation of the existing building.

6.B.g Feasibility Conclusion

Based on its review of the MGT building rehabilitation evaluation, the District concluded that rehabilitation of the historic MPR is technically possible but not practicable when evaluated against current educational standards, accessibility and life-safety requirements, operational objectives, and long-term fiscal stewardship considerations. The study found that rehabilitation would require extensive modernization and substantial capital investment

while continuing to retain significant functional limitations. Consequently, the District determined that demolishing and replacing the building is the most effective way to support its current and future educational programming needs, campus organization goals, accessibility requirements, and long-term operational sustainability.

6.C Project Alternatives

6.C.a Alternative 1A - MPR Adaptive Reuse Alternative

Under Alternative 1A, the District would reconstruct and modernize the campus with new facilities and site improvements, as described for the proposed project, except that the MPR, Building G, would be retained and adaptively reused rather than demolished and replaced. Under this alternative, Building G would be preserved in place, rehabilitated, and converted into the primary administrative office building serving the campus.

The scope of work for MPR rehabilitation and adaptive reuse would include selective interior demolition, modernization, and reconfiguration of the building to accommodate administrative offices, reception areas, conference rooms, staff workspaces, records storage, student support spaces, and other functions necessary to serve as the school's main administration facility. Comprehensive corrective actions would be completed to address structural, architectural, mechanical, electrical, plumbing, accessibility, fire/life-safety, and operational deficiencies. Improvements would be implemented to the extent feasible while maintaining consistency with applicable historic preservation standards and character-defining features of the building, while also addressing contemporary educational, operational, accessibility, life-safety, and building code requirements applicable to a public-school administration facility.

Improvements would include, but would not be limited to, the following:

Building Rehabilitation and Corrective Actions

The following building rehabilitation and corrective actions would be required to address deferred maintenance, deteriorated building systems, and physical deficiencies associated with the existing structure:

- Remove and replace existing windows and doors with energy-efficient assemblies designed to meet current energy code requirements while maintaining the historic character of the building.
- Replace the existing HVAC system with high-efficiency heating, ventilation, and air-conditioning equipment, upgraded ductwork, and digital building control systems.
- Remove and replace existing domestic water distribution piping and sanitary sewer systems with new code-compliant utility infrastructure.
- Repair identified structural masonry deficiencies, evaluate foundation conditions, and implement drainage improvements to address localized settlement and moisture-related concerns.
- Remove existing flooring materials and install new flooring finishes suitable for administrative use.
- Remove and replace existing ceiling systems and address sources of moisture intrusion.
- Upgrade interior lighting systems with energy-efficient LED fixtures and lighting controls.
- Correct site drainage and grading deficiencies through regrading, replacement of improperly sloped sidewalks, installation of trench drains or subdrains, and roof drainage improvements.
- Conduct required asbestos, lead-based paint, and other hazardous-material remediation in accordance with applicable regulations.

Adaptive Reuse and Interior Reconfiguration

The existing MPR would require substantial interior modifications to support its conversion into an administrative office building:

- Perform selective interior demolition of existing spaces and finishes.
- Remove existing kitchen and food-service equipment and abandon associated utility connections no longer needed.
- Construct new interior wall partitions, doors, and circulation corridors to create administrative offices, reception areas, conference rooms, student support spaces, records storage, workrooms, and related administrative functions.
- Install new interior finishes, casework, millwork, acoustical treatments, and furnishings appropriate for administrative uses.
- Reconfigure building systems and spaces to support day-to-day administrative operations and staff occupancy.

Accessibility and Code Compliance Upgrades

To support continued occupancy and adaptive reuse of the building, upgrades would be required to comply with applicable accessibility and building code requirements:

- Renovate existing restroom facilities and provide accessible, code-compliant restrooms meeting current Division of the State Architect (DSA) requirements including Americans with Disabilities Act (ADA) and California Building Code (CBC). and
- Upgrade entrances, door hardware, thresholds, ramps, signage, and interior circulation routes to achieve accessibility compliance.
- Modify occupant egress pathways and associated building elements as necessary to comply with current code requirements for administrative occupancy.

Life-Safety and Building Systems Modernization

Comprehensive modernization of life-safety, electrical, technology, and communications systems would be required to support administrative occupancy:

- Install a complete automatic fire sprinkler system throughout the building, including a dedicated fire-suppression water main.
- Upgrade and integrate fire alarm, smoke detection, and emergency notification systems.
- Install emergency lighting and illuminated exit signage throughout the facility.
- Upgrade electrical distribution equipment, branch circuits, and related infrastructure.
- Install telecommunications, data, security, access-control, and audiovisual systems necessary for administrative operations.
- Upgrade building systems as necessary to comply with current fire/life-safety and occupancy requirements.
- Potential structural and seismic upgrades that may be required to comply with current CBC structural and life-safety requirements.

Site and Operational Improvements

Additional site improvements would be required to support the building's function as the campus administrative office:

- Modify staff and visitor access points as necessary to support administrative operations.
- Improve pedestrian circulation and accessibility around the building.
- Upgrade utilities serving the building.
- Install or modify security fencing, gates, and controlled-access features.
- Construct landscaping and hardscape improvements associated with the adaptive reuse of the facility.
- Modify parking, service access, and drop-off areas as necessary to support administrative functions.

6.C.b Alternative 1B: MPR Rehabilitation Alternative

Under Alternative 1B, the District would reconstruct and modernize the campus with new facilities and site improvements, as described for the proposed project, except that the existing MPR would be retained, rehabilitated, and modernized rather than demolished and replaced. Under this alternative, the MPR would continue to function as the campus multi-purpose room and would remain the primary facility for student dining, assemblies, performances, community events, and other school functions. The District would forego constructing a new MPR and construct a new administration building in a nearby location.

The scope of work would include the same comprehensive rehabilitation and modernization of the existing building as described in Section 5.C.a Alternative 1A, however the work to convert the building to an administration building would not occur, and instead the building would be modernized with kitchen, assembly room, and stage improvements. The improvements unique to Alternative 1B would include:

Assembly Room, Stage, and Kitchen Modernization

The existing MPR would require substantial modernization to support its continued use as a school assembly and food-service facility:

- Renovate and reconfigure the existing kitchen and food-service areas to support contemporary school nutrition and meal-service operations.
- Replace obsolete kitchen equipment, fixtures, finishes, and utility connections.
- Upgrade food preparation, serving, storage, and support areas as necessary to comply with current health and safety requirements.
- Modernize the stage area, including replacement or rehabilitation of stage finishes, curtains, lighting, and associated support infrastructure.
- Improve backstage, storage, and performance support areas to enhance functionality for assemblies, performances, and community events.
- Install new interior finishes, casework, millwork, acoustical treatments, and furnishings appropriate for continued MPR use.

- Improve loading, maintenance, and service access areas associated with the continued operation of the MPR.

6.D.c No Project Alternative

Under the No Project Alternative, the proposed campus modernization project would not be implemented. The District would not demolish, reconstruct, modernize, rehabilitate, or expand campus facilities, and no new buildings, infrastructure improvements, accessibility upgrades, circulation improvements, utility upgrades, or site improvements associated with the proposed project would occur.

Existing campus facilities, including the historic MPR (as well as the Library/Building J, and Classroom Buildings C and D), would remain in their current locations and continue to operate in their existing condition and configuration. The MPR would not be demolished, rehabilitated, adaptively reused, or substantially renovated. Similarly, the existing administration building, classrooms, parking lots, play areas, support facilities, and site improvements would remain unchanged.

The District would continue to perform routine maintenance and repairs necessary to maintain safe operation of campus facilities. Such activities could include minor repairs, replacement of worn building components, routine maintenance of building systems and utilities, and other activities exempt from CEQA pursuant to State CEQA Guidelines Sections 15301 and 15302. However, no major modernization, reconstruction, replacement, expansion, or rehabilitation activities would occur under this alternative.

Under the No Project Alternative, the existing campus would continue to operate with the aging building systems, accessibility constraints, educational deficiencies, operational limitations, and deferred maintenance conditions identified throughout this EIR. Existing facilities would remain available for educational use; however, the District's planned modernization objectives, including improvements to educational functionality, accessibility, safety, security, operational efficiency, and long-term facility performance, would not be achieved.

This alternative would avoid demolition of the historic MPR and would therefore avoid the significant and unavoidable impact to historical resources identified for the proposed project. However, it would not address the identified facility deficiencies, modernization needs, or long-term educational and operational objectives that form the basis of the Proposed Project.

TABLE 27: SUMMARY OF COMPARING PROJECT ALTERNATIVES

Impacts / Objectives	Proposed Project	Alternative 1A: MPR Adaptive Reuse	Alternative 1B: MPR Rehabilitation	No Project
Project Objectives	**This objective would be:**			
1. Provide Equitable and Inclusive Educational Facilities	Fully met	Substantially met	Not fully met	Not met
2. Improve Student Health, Safety, and Environmental Quality	Fully met	Fully met	Fully met	Not met
3. Enhance Campus Security and Operational Efficiency	Fully met	Not fully met	Not fully met	Not met
4. Replace Inefficient Facilities to Reduce Long Term Costs	Fully met	Not fully met	Not fully met	Not met
5. Maximize Cost Effectiveness and Efficient Use of Measure H Funds	Fully met	Not met	Not fully met	Not met
Air Quality				
Impact AQ-A. Obstruction of air quality plans	Less Than Significant with Mitigation Incorporated	Less Than Significant with Mitigation Incorporated	Less Than Significant with Mitigation Incorporated	No Impact
Impact AQ-B. Air Quality Criteria Pollutants	Less than Significant	Less than Significant	Less than Significant	No Impact
Impact AQ-C. Exposer to Pollutant Concentrations	Less Than Significant with Mitigation Incorporated	Less Than Significant with Mitigation Incorporated	Less Than Significant with Mitigation Incorporated	No Impact
Impact AQ-D. Odors Affecting People	Less than Significant	Less than Significant	Less than Significant	No Impact
Historic Architectural Resources				
Impact HIST-A. Adverse Change to Historic Resource	Significant and Unavoidable with Mitigation Incorporated	Less Than Significant with Mitigation Incorporated	Less Than Significant with Mitigation Incorporated	No Impact
Hazards & Hazardous Materials				
Impact HAZ-A. Transport of Hazardous Material	Less than Significant	Less than Significant	Less than Significant	No Impact

Impacts / Objectives	Proposed Project	Alternative 1A: MPR Adaptive Reuse	Alternative 1B: MPR Rehabilitation	No Project
Impact HAZ-B. Release of Hazardous Material	Less Than Significant with Mitigation Incorporated	Less Than Significant with Mitigation Incorporated	Less Than Significant with Mitigation Incorporated	No Impact
Impact HAZ-C. Emit Hazardous Materials Near School	Less than Significant	Less than Significant	Less than Significant	No Impact
Impact HAZ-D. Near Hazardous Material Site	No Impact	No Impact	No Impact	No Impact
Impact HAZ-E. Near Airport	No Impact	No Impact	No Impact	No Impact
Impact HAZ-F. Interference with Emergency Response Plan	Less than Significant	Less than Significant	Less than Significant	No Impact
Impact HAZ-G. Exposure to Willand Fires	No Impact	No Impact	No Impact	No Impact
Aesthetics				
Impact AES-A. Scenic Vista	Less than Significant	Less than Significant	Less than Significant	No Impact
Impact AES-B. Scenic Resources (Trees, Rock Outcroppings, Historic Buildings**)**	Less Than Significant with Mitigation Incorporated	Less than Significant	Less than Significant	No Impact
Impact AES-C. Visual Character	Less Than Significant with Mitigation Incorporated	Less than Significant	Less than Significant	No Impact
Impact AES-D. Light and Glare	Less than Significant	Less than Significant	Less than Significant	No Impact
Biological Resources				
Impact BIO-A. Special Status and Protected Species/Habitats	Less Than Significant with Mitigation Incorporated	Less Than Significant with Mitigation Incorporated	Less Than Significant with Mitigation Incorporated	No Impact
Impact BIO-B. Riparian, Natural Communities	No Impact	No Impact	No Impact	No Impact
Impact BIO-C. Wetlands	No Impact	No Impact	No Impact	No Impact

Impacts / Objectives	Proposed Project	Alternative 1A: MPR Adaptive Reuse	Alternative 1B: MPR Rehabilitation	No Project
Impact BIO-D. Wildlife Movement	No Impact	No Impact	No Impact	No Impact
Impact BIO-E. Local Policies	Less than Significant	Less than Significant	Less than Significant	No Impact
Impact BIO-F. Habitat Conservation Plans	No Impact	No Impact	No Impact	No Impact
Archeological Resources				
Impact ARC-A. Archeological Resource	Less Than Significant with Mitigation Incorporated	Less Than Significant with Mitigation Incorporated	Less Than Significant with Mitigation Incorporated	No Impact
Impact ARC-B. Human Remains	Less Than Significant with Mitigation Incorporated	Less Than Significant with Mitigation Incorporated	Less Than Significant with Mitigation Incorporated	No Impact
Energy and Energy Resources				
Impact ENGY-A. Energy Consumption	Less than Significant	Less than Significant	Less than Significant	No Impact
Impact ENGY-B. Energy Policies	Less than Significant	Less than Significant	Less than Significant	No Impact
Geology and Soils				
Impact GEO-A. Risk Earthquake Fault	No Impact	No Impact	No Impact	No Impact
Impact GEO-B. Soil Erosion	Less than Significant	Less than Significant	Less than Significant	No Impact
Impact GEO-C. Unstable Soil	Less than Significant	Less than Significant	Less than Significant	No Impact
Impact GEO-D. Expansive Soils	Less Than Significant	Less Than Significant	Less Than Significant	No Impact
Impact GEO-E. Wastewater Disposal	No Impact	No Impact	No Impact	No Impact
Impact GEO-F. Paleontological Resources	Less Than Significant with Mitigation Incorporated	Less Than Significant with Mitigation Incorporated	Less Than Significant with Mitigation Incorporated	No Impact

Impacts / Objectives	Proposed Project	Alternative 1A: MPR Adaptive Reuse	Alternative 1B: MPR Rehabilitation	No Project
Greenhouse Gases				
Impact GHG-A. GHG Emissions	Less Than Significant with Mitigation Incorporated	Less Than Significant with Mitigation Incorporated	Less Than Significant with Mitigation Incorporated	No Impact
Impact GHG-B. Conflict with GHG Plans	Less Than Significant with Mitigation Incorporated	Less Than Significant with Mitigation Incorporated	Less Than Significant with Mitigation Incorporated	No Impact
Hydrology and Water Quality				
Impact HYD-A. Water Quality Standards	Less Than Significant	Less Than Significant	Less Than Significant	No Impact
Impact HYD-B. Groundwater	Less Than Significant	Less Than Significant	Less Than Significant	No Impact
Impact HYD-C. Off-Site Drainage/Erosion	Less Than Significant	Less Than Significant	Less Than Significant	No Impact
Impact HYD-D. Flooding	No Impact	No Impact	No Impact	No Impact
Impact HYD-E. Water Quality and Groundwater Plans	Less Than Significant	Less Than Significant	Less Than Significant	No Impact
Noise and Groundborne Vibrations				
Impact NOISE-A. Ambient Noise	Less Than Significant with Mitigation Incorporated	Less Than Significant with Mitigation Incorporated	Less Than Significant with Mitigation Incorporated	No Impact
Impact NOISE -B. Groundborne Vibration	Less Than Significant with Mitigation Incorporated	Less Than Significant with Mitigation Incorporated	Less Than Significant with Mitigation Incorporated	No Impact
Impact NOISE -C. Airport Plans	No Impact	No Impact	No Impact	No Impact
Transportation				
Impact TRAN-A. Transportation Policies	Less Than Significant with Mitigation Incorporated	Less Than Significant with Mitigation Incorporated	Less Than Significant with Mitigation Incorporated	No Impact
Impact TRAN-B. Vehicle Miles Traveled	Less Than Significant	Less Than Significant	Less Than Significant	No Impact

Impacts / Objectives	Proposed Project	Alternative 1A: MPR Adaptive Reuse	Alternative 1B: MPR Rehabilitation	No Project
Impact TRAN-C. Geometric Hazards	Less Than Significant	Less Than Significant	Less Than Significant	No Impact
Impact TRAN-D. Emergency Access	Less Than Significant	Less Than Significant	Less Than Significant	No Impact
Tribal Cultural Resources				
Impact TC-A. Tribal Cultural Resources	Less Than Significant with Mitigation Incorporated	Less Than Significant with Mitigation Incorporated	Less Than Significant with Mitigation Incorporated	No Impact
Agriculture and Forestry Resources				
Impact AG-A. Farmland Conversion	No Impact	No Impact	No Impact	No Impact
Impact AG-B. Williamson Act	No Impact	No Impact	No Impact	No Impact
Impact AG-C. Forestland Rezoning	No Impact	No Impact	No Impact	No Impact
Impact AG-D. Loss of Forestland Use	No Impact	No Impact	No Impact	No Impact
Impact AG-E. Farmland and Forestland Conversion	No Impact	No Impact	No impact	No Impact
Land Use and Planning				
Impact LUP-A. Divide a Community	No Impact	No Impact	No Impact	No Impact
Impact LUP-B. Land Use Plan Conflict	No Impact	No Impact	No Impact	No Impact
Mineral Resources				
Impact MINE-A. Loss of Mineral Resources	No Impact	No Impact	No Impact	No Impact
Impact MINE-B. Conflict with Mineral Resource Plans	No Impact	No Impact	No Impact	No Impact
Population and Housing				
Impact POP-A. Induce Growth	No Impact	No Impact	No Impact	No Impact

Impacts / Objectives	Proposed Project	Alternative 1A: MPR Adaptive Reuse	Alternative 1B: MPR Rehabilitation	No Project
Impact POP-B. Displace People	No Impact	No Impact	No Impact	No Impact
Public Services				
Impact PUB-A. Public Services (Fire, Police, Schools, Parks, etc.)	No Impact	No Impact	No Impact	No Impact
Recreation				
Impact REC-A. Recreation Facilities	No Impact	No Impact	No Impact	No Impact
Impact REC-B. Induce Need for Recreation Facilities	Less than Significant	Less than Significant	Less than Significant	No Impact
Utilities and Service Systems				
Impact UTIL-A. Require Expansion of Utility Infrastructure	Less than Significant	Less than Significant	Less than Significant	No Impact
Impact UTIL-B. Water Supply	No Impact	No Impact	No Impact	No Impact
Impact UTIL-C. Wastewater Capacity	No Impact	No Impact	No Impact	No Impact
Impact UTIL-D. Solid Waste Capacity	No Impact	No Impact	No Impact	No Impact
Impact UTIL-E. Solid Waste Capacity Policies	No Impact	No Impact	No Impact	No Impact
Wildfire				
Impact FIRE-A. Emergency Response Plans	No Impact	No Impact	No Impact	No Impact
Impact FIRE-B. Wildfire Spread	No Impact	No Impact	No Impact	No Impact
Impact FIRE-C. Need for Fire Prevention Infrastructure	No Impact	No Impact	No Impact	No Impact
Impact FIRE-D. Landslides and Flooding	No Impact	No Impact	No Impact	No Impact

6.D Alternative Projects' Ability to Meet Project Objectives

The following discussion evaluates the extent to which each project alternative would meet the project objectives.

6.D.a Alternative 1A - MPR Adaptive Reuse Alternative

Based on its review of the MGT Historic Rehabilitation Feasibility Evaluation and the rehabilitation requirements summarized above, the District determined that Alternative 1A would partially meet the Project Objectives. Alternative 1A would retain and rehabilitate the historic MPR, thereby avoiding demolition of a historical resource, while also providing a new multi-purpose facility to serve students. However, the District found that retaining the historic structure as an administration building would introduce operational and financial inefficiencies because the rehabilitated building would be substantially larger than the District's identified administrative space needs. Except for the treatment of the historic MPR and foregoing the construction of a new administration building, the improvements proposed under Alternative 1A for the remainder of the campus would be the same as those included in the proposed project.

Therefore, the campus modernization, infrastructure, accessibility, safety, and site improvements proposed throughout the remainder of the campus would meet the project objectives to substantially the same degree as the proposed project.

Objective 1: Provide Equitable and Inclusive Educational Facilities.
The District determined that this objective would be substantially met. Under Alternative 1A, students would benefit from construction of a new multipurpose facility designed to support contemporary educational programming, accessibility requirements, and instructional needs. However, the rehabilitated historic building would continue to exhibit limitations associated with its original design that could constrain the efficiency and functionality of administrative offices, counseling spaces, and other student support services. As a result, Alternative 1A would not provide the same level of modernized educational facilities and support spaces as the proposed project.

Objective 2: Improve Student Health, Safety, and Environmental Quality.
The District determined that this objective would be fully met. Rehabilitation of the historic building and construction of a new MPR would include upgrades necessary to address identified life-safety, accessibility, and environmental deficiencies. Both facilities would provide safe and code-compliant environments that support student and staff wellbeing.

Objective 3: Enhance Campus Security and Operational Efficiency.
The District determined that this objective would not be fully met. Construction of a new MPR would improve campus functionality and support modernization objectives. However, the District found that adapting the historic MPR for administration use would result in operational inefficiencies because the approximately 6,322-square-foot building substantially exceeds the District's identified administrative space needs of approximately 4,035 square feet in the proposed project. The building's historic layout would also require modifications to accommodate administrative functions. The District also found that the building's historic orientation and access configuration are not well aligned with the redesigned campus circulation pattern. The building's primary entrance faces south, whereas the redesigned campus would introduce a new primary arrival area and parking/drop-off facilities north of the building, thereby reducing operational efficiency and convenience compared to the proposed Project.

Objective 4: Replace Inefficient Facilities to Reduce Long-Term Costs.
The District determined that this objective would not be fully met. While students would be served by a new, efficient MPR and Early Learning building, the District would continue to operate and maintain a rehabilitated historic structure with greater maintenance demands and lower long-term efficiency than a purposed new administration building.

Objective 5: Maximize Cost Effectiveness and Efficient Use of Measure H Funds.
The District determined that this objective would not be met. The MGT evaluation estimated rehabilitation costs at approximately $4.14 million, or approximately 191.99 percent of the building's replacement value. This estimate does not include potential structural and seismic upgrades necessary to comply with current California Building Code (CBC) requirements, which could considerably increase costs. The District found that this substantial investment would be required while still retaining significant configuration limitations and ongoing maintenance obligations. As a result, the alternative would greatly reduce the District's ability to allocate available Measure H funding to other project priorities and facility needs throughout the District.

Conclusion.
Overall, the District determined that Alternative 1A would successfully preserve the historic MPR while providing students with a new multi-purpose facility. Accordingly, Alternative 1A would achieve many of the educational and modernization benefits of the proposed project. However, the District concluded that the alternative would be less cost-effective, operationally efficient, and would affect student support services compared to the proposed project because it would require rehabilitation and long-term maintenance of an oversized historic administration building in addition to the need to construct a new MPR.

6.D.b Alternative 1B – MPR Rehabilitation Alternative

Based on its review of the MGT Historic Rehabilitation Feasibility Evaluation and the rehabilitation requirements summarized above, the District determined that Alternative 1B would partially meet the project objectives. Alternative 1B would retain and rehabilitate the historic MPR for continued multi-purpose use, thereby avoiding demolition of a historical resource. However, the District found that continuing to use the building as an MPR would retain many of the educational and operational limitations identified in the MGT evaluation. Except for the retention and rehabilitation of the historic MPR, foregoing the construction of a new MPR, and locating the proposed new administration building in the nearby location of the proposed MPR as shown in the proposed project, the improvements proposed under Alternative 1B for the remainder of the campus would generally be the same as those included in the proposed project.

Therefore, the campus modernization, infrastructure, accessibility, safety, and site improvements proposed throughout the remainder of the campus would meet the project objectives to substantially the same degree as the proposed project. The District's evaluation of Alternative 1B therefore focuses primarily on the extent to which continued use of the rehabilitated MPR would affect attainment of the project objectives.

Objective 1: Provide Equitable and Inclusive Educational Facilities.
The District determined that this objective would not be fully met. Rehabilitation would improve accessibility, building systems, and overall facility conditions. However, the historic building's limited size, outdated configuration, insufficient assembly capacity, and inability to fully support contemporary educational programming would constrain the District's ability to provide educational facilities comparable to those achievable under the Proposed Project.

Objective 2: Improve Student Health, Safety, and Environmental Quality.
The District determined that this objective would fully met. Rehabilitation of the historic MPR would include upgrades necessary to address identified life-safety, accessibility, and environmental deficiencies, including installation of modern fire and life-safety systems, accessibility improvements, replacement of aging building systems, and hazardous materials abatement where required.

Objective 3: Enhance Campus Security and Operational Efficiency.
The District determined that this objective would not be fully met. Although the alternative would allow for certain campus modernization improvements, retention of the historic MPR would limit opportunities to fully optimize campus organization, circulation, and operational efficiency. The building's existing footprint and configuration would continue to create functional constraints relative to replacement construction.

Objective 4: Replace Inefficient Facilities to Reduce Long-Term Costs.
The District determined that this objective would not be fully met. While students would be served by a new Early Learning building and a new administrative office (for campus support functions) and rehabilitation would improve building performance and extend the useful life of the historic structure, the MPR would continue to exhibit limitations associated with its age, configuration, energy performance, and maintenance requirements. The District found that replacement construction would provide superior long-term operational performance and lifecycle cost benefits.

Objective 5: Maximize Cost Effectiveness and Efficient Use of Measure H Funds.
The District determined that this objective would not be fully met. The MGT evaluation estimated rehabilitation costs at approximately $2.14 million, or approximately 60 percent of the building's replacement value. This estimate does not include potential structural and seismic upgrades necessary to comply with current California Building Code (CBC) requirements, which could considerably increase costs. The District found that this significant investment would be required while still retaining significant functional limitations and ongoing maintenance obligations. As a result, the alternative would reduce the District's ability to allocate available Measure H funding to other project priorities and facility needs throughout the District.

Conclusion.
Overall, the District determined that Alternative 1B would preserve the historic MPR and improve the condition, safety, and accessibility of the facility. However, the District concluded that the alternative would not achieve the project objectives to the same extent as the proposed project because the rehabilitated building would continue to experience educational, operational, and functional limitations associated with its age, size, and historic configuration. In particular, Alternative 1B would not provide the capacity, flexibility, or educational functionality of a new multi-purpose facility.

6.D.c No Project Alternative

Based on its review of existing campus conditions and the facility needs identified by the District, the District determined that the No Project Alternative would not meet most of the Project Objectives. Under this alternative, the historic MPR and all other campus facilities would remain in their current condition and configuration, and no campus modernization, building replacement, accessibility improvements, infrastructure upgrades, or site improvements associated with the proposed project would occur. Although the No Project Alternative would avoid demolition of the historic MPR and preserve the resource in place, it would not address the educational, operational, accessibility, safety, and facility deficiencies that form the basis for the proposed project.

Objective 1: Provide Equitable and Inclusive Educational Facilities.
The District determined that this objective would not be met. Existing campus facilities would remain in their current condition and configuration and would continue to exhibit the educational, functional, and accessibility limitations identified throughout this EIR. The No Project Alternative would not provide modernized learning environments, improved educational facilities, or enhanced support for contemporary instructional and technology needs.

Objective 2: Improve Student Health, Safety, and Environmental Quality.
The District determined that this objective would not be met. Existing deficiencies related to aging building systems, accessibility limitations, environmental conditions, and life-safety features would remain. While routine maintenance continues, the comprehensive upgrades and corrective actions proposed under the proposed project would not occur.

Objective 3: Enhance Campus Security and Operational Efficiency.
The District determined that this objective would not be met. The existing campus layout, circulation patterns, and operational constraints would remain unchanged. The No Project Alternative would not implement the campus reorganization, security enhancements, or operational improvements proposed by the Project.

Objective 4: Replace Inefficient Facilities to Reduce Long-Term Costs.
The District determined that this objective would not be met. Existing aging facilities, including the historic MPR, would continue to require ongoing maintenance and repairs. The No Project Alternative would not replace deteriorated or inefficient facilities, improve energy performance, or reduce long-term maintenance and operational costs.

Objective 5: Maximize Cost Effectiveness and Efficient Use of Measure H Funds.
The District determined that this objective would not be met. Although the No Project Alternative would avoid the capital costs associated with the Proposed Project, it would not achieve the intended benefits of the District's Measure H investment. The District would forgo the opportunity to modernize campus facilities, address identified deficiencies and provide long-term educational and operational improvements using available bond funding.

Conclusion.
Overall, the District determined that the No Project Alternative would preserve the historic MPR and avoid the significant and unavoidable impact to historical resources associated with demolition of the building. However, because no modernization, reconstruction, or rehabilitation of campus facilities would occur, the No Project Alternative would not achieve the Project Objectives and would not address the deficiencies, operational limitations, accessibility needs, safety concerns, and aging infrastructure that the Proposed Project is intended to resolve.

Sub-Chapter 6A Project Alternative 1A Impact Analysis

The following sub-chapter analyzes the potential environmental impacts of Project Alternative 1A – MPR Adaptive Reuse Alternative.

Topics That Require Detailed Level of Analysis

6.1 Air Quality

Less than Significant Impact with Mitigation Incorporated

The environmental and regulatory setting of Alternative 1A is the same as that described in Section 4.1 Air Quality of this DEIR. As this alternative would include less construction activities by retaining the existing MPR, impacts from construction emissions would be marginally less than the proposed project. Alternative 1A would also include the implementation of Mitigation Measure AQ-1: Use of Tier 4 Final (or Cleaner) Construction Equipment, and AQ-2: Heavy Duty Vehicle and Equipment Anti-Idling Requirements, and would not result in a significant increase in criteria air pollutants or obstruct with the implementation of applicable air quality plans. The impact is **less than significant with mitigation incorporated**. No additional mitigation is required.

6.2 Historic Architectural Resources

Less than Significant Impact with Mitigation Incorporated

The environmental and regulatory setting of Alternative 1A is the same as that described in Section 4.2, Historic Architectural Resources, of this DEIR. Building J (Library), Classroom Buildings C and D, and the MPR are individually eligible for listing in the California Register of Historical Resources under Criteria 1 and 3 due to their association with noted architects and as intact examples of distinct architectural styles. Accordingly, these buildings are considered historical resources.

Under Alternative 1A, the District would reconstruct and modernize the campus, as described for the proposed project, except that the existing MPR (Building G) would be retained and adaptively reused rather than demolished and replaced, and a new administration building would not be constructed. Under this alternative, the MPR would be preserved in place, rehabilitated, and converted into the primary administrative office building serving the campus while preserving its character-defining features. Building J (Library) and Classroom Buildings C and D would undergo interior remodeling and fire/security alarm upgrades.

As discussed in Section 4.2, interior remodeling activities in Buildings C and D and Building J (Library) could result in a significant impact on historical resources if they alter or remove character-defining features or spatial relationships that convey historical significance. Under Alternative 1A, this potential impact could also occur as a result of the rehabilitation and adaptive reuse of the MPR. Therefore, Mitigation Measures HIST-8 through HIST-13 would be expanded to include the MPR, in addition to Buildings C and D and Building J (Library). These measures include provisions requiring rehabilitation and renovation work affecting historical resources to be designed and implemented in a manner that preserves their historical integrity and character-defining features. Because the MPR would not be demolished under this alternative, Mitigation Measures HIST-1 through HIST-7 would not apply.

Implementation of Mitigation Measures HIST-8 through HIST-13 would reduce impacts to historical resources to a **less than significant level with mitigation incorporated.** No additional mitigation is required.

6.3 Hazards and Hazardous Materials

Less than Significant Impact with Mitigation Incorporated

The environmental and regulatory setting of Alternative 1A is the same as that described in Section 4.3, Hazards and Hazardous Materials of this DEIR.

For reasons stated in Section 4.3.4 impacts due to exposure to excessive noise from public airport, interference with an emergency response plan, and exposure to wildfire would be less than significant.

A Phase I ESA was completed to identify RECs at the project site and is included in Appendix F. The report identified the presence of an abandoned-in-place Underground Storage Tank (UST) as an on-site Historical REC (HREC) and an off-site Vapor Encroachment Condition from a regional groundwater contamination plume. A Supplemental Phase II ESA investigated VOC vapor intrusion within the existing school buildings and found that VOCs above San Francisco Regional Water Quality Control Board residential screening levels were not detected by the indoor gas probes above their respective ESLs. Soil sampling found that a limited area of soil in the south parking lot planter has lead contamination above DTSC screening levels and recommended remediation.

A hazardous building materials survey also found that various on-site buildings contain lead-based paint, lead-containing materials, and asbestos-containing materials. Impacts associated with the presence of hazardous building materials (asbestos and lead), including the rehabilitated MPR, would be abated per appropriate regulatory standards so that all buildings are rehabilitated and operated without risk of exposure of sensitive receptors, construction workers, or users to these materials.

Under Alternative 1A, lead contaminated soil would be appropriately managed and remediated (through removal or encapsulation) under the direction of a hazardous soil management plan prepared by a professional engineer or professional geologist to ensure construction or operation activities would not expose people or the environment to hazardous levels of lead. Implementation of Mitigation Measure HAZ-1: Lead-Containing Soil Abatement and Management would reduce the impact to **less than significant with mitigation incorporated**. No additional mitigation is required.

Topics That Required Moderate Level of Analysis

6.4 Aesthetics

Less than Significant Impact with Mitigation Incorporated

As discussed in Section 4.4, the existing campus exhibits an established architectural character that includes mid-century modern and finger-plan design elements that contribute to its visual distinctiveness. Similar to the proposed project, Alternative 1A would modernize portions of the campus through demolition of Buildings E and F and Portable Buildings P11, P12, and P13 and construction of new educational facilities. These improvements would alter the visual appearance of portions of the campus and views from adjacent roadways. However, unlike the proposed project, Alternative 1A would retain and rehabilitate the historic MPR rather than demolish and replace it.

Retention of the MPR would preserve an important component of the campus's existing visual character, including its red brick exterior and mid-century modern architectural design. As a result, Alternative 1A would maintain more of the campus' existing architectural identity than the proposed project. However, as with the proposed project, modernization of Buildings C, D, and J, and additionally the rehabilitation of the MPR under Alternative 1A, has the potential to result in a significant impact on the scenic value of these historic buildings. Therefore, mitigation measures HIST-8 through HIST-14 would be implemented to ensure that remodeling and rehabilitation activities of all historical buildings, including the MPR, would be done while preserving historic integrity and each building's associated scenic value.

Although new construction would introduce contemporary architectural forms, materials, and site improvements, the alternative would not substantially degrade visual quality, scenic resources, or the visual character of the area. Accordingly, impacts related to aesthetics would be **less than significant with mitigation incorporated.**

6.5 Biological Resources

Less than Significant Impact with Mitigation Incorporated

The environmental and regulatory setting of Alternative 1A is the same as that described in Section 4.5 Biological Resources for this Draft EIR. For reasons stated in Section 4.5.4 impacts to special status species, riparian habitat, wetlands and sensitive natural communities would be similar to the proposed project. There would be no impact.

However, multiple landscape trees are located at the project site that may provide habitat for nesting birds which are protected by the Migratory Bird Treaty Act (MBTA). Buildings proposed for demolition could also provide nesting habitat for birds. Trees and buildings that would be removed during construction may significantly impact nesting birds if removal/demolition occurs during the nesting bird season. With the implementation of MM BIO-1, the impact to nesting birds would be **less than significant with mitigation incorporated.** No Additional mitigation is required.

6.6 Archeological Resources

Less than Significant Impact with Mitigation Incorporated

The environmental and regulatory setting of Alternative 1A is the same as that described in Section 4.6 Archaeological Resources of this Draft EIR. For reasons stated in Section 4.6.4, impacts under Alternative 1a would be similar to the proposed project. Alternative 1A would also involve demolition, grading, and other ground-disturbing activities that could expose previously unknown subsurface archaeological resources. Although the likelihood of encountering intact resources is reduced by long-term disturbance, the possibility cannot be entirely discounted given the long regional history of human occupation in the San Joaquin Valley and the presence of alluvial soils that can bury cultural materials. As a result, construction activities could result in a substantial adverse change in the significance of an archaeological resource if an unknown resource were discovered and inadvertently damaged or destroyed. Therefore, Mitigation Measure ARC-1 would be incorporated into Alternative 1A to protect any discovered archeological resource during construction activities. The impact would be **less than significant with mitigation incorporated**. No additional mitigation is required.

6.7 Energy and Energy Resources

Less than Significant Impact

The environmental and regulatory setting of Alternative 1A is the same as that described in Section 4.7, Energy and Energy Resources, of this Draft EIR.

Construction

For the reasons discussed in Section 4.7.4, construction-related energy impacts under Alternative 1A would be similar to those of the proposed project. Alternative 1A would involve rehabilitation and adaptive reuse of the MPR rather than demolition and construction of a replacement administration building, resulting in a slightly lower level of construction activity and associated fuel consumption by construction equipment and vehicles. However, this reduction in construction-related energy demand would not substantially alter the project's overall energy consumption profile. Accordingly, construction-related energy impacts would remain less than significant.

Operation

Under Alternative 1A, the MPR would be retained, rehabilitated, and adaptively reused as the campus administration building. Rehabilitation of the MPR would incorporate energy-efficiency improvements, including upgrades to building systems and improvements to the building envelope, to the extent feasible while maintaining the building's character-defining historic features. Although the rehabilitated MPR may be somewhat less energy efficient than a newly constructed administration building designed entirely to current energy-efficiency standards, the building would comply with applicable provisions of the California Building Code, including the California Historical Building Code where applicable.

The California Historical Building Code recognizes the need to balance historic preservation objectives with energy-efficiency improvements and allows alternative compliance measures for qualified historic structures. As a result, operation of the rehabilitated MPR would not constitute an inefficient, wasteful, or unnecessary consumption of energy. Furthermore, because the retained MPR would represent only one building within the overall campus, any incremental increase in operational energy demand compared to the proposed project would be limited.

Therefore, construction and operations under Alternative 1A would not result in the inefficient, wasteful, or unnecessary consumption of energy resources. Impacts would be l**ess than significant.**

6.8 Geology and Soils

Less than Significant Impact with Mitigation Incorporated

The environmental and regulatory setting of Alternative 1A is the same as that described in Section 4.8, Geology and Soils, of this Draft EIR.

For the reasons discussed in Section 4.8.4, impacts related to seismic hazards, unstable geologic units, and expansive soils would be similar to those identified for the proposed project. Alternative 1A would retain and rehabilitate the existing MPR rather than demolish and reconstruct it. As part of the rehabilitation effort, the MPR would undergo structural and seismic upgrades designed to meet applicable Division of the State Architect (DSA) requirements while preserving the building's historical integrity. Accordingly, the rehabilitated building would comply with applicable structural and life-safety standards for continued occupancy.

No known paleontological resources have been recorded within the project site. However, inadvertent discovery of paleontological resources could occur during ground-disturbing activities associated with construction of the new buildings, utilities, and site improvements proposed under Alternative 1A. Therefore, as with the proposed project, implementation of Mitigation Measure GEO-1 would be required. With implementation of Mitigation

Measure GEO-1, impacts to paleontological resources would be reduced to a **less than significant level with mitigation incorporated**. No additional mitigation is required.

6.9 Greenhouse Gases

Less than Significant Impact with Mitigation Incorporated

The environmental and regulatory setting of Alternative 1A is the same as that described in Section 4.9, Greenhouse Gas Emissions, of this Draft EIR.

Construction
For the reasons discussed in Section 4.9.4, construction-related greenhouse gas emissions under Alternative 1A would be similar to those of the proposed project. Because Alternative 1A would rehabilitate and adaptively reuse the existing MPR rather than demolish and reconstruct the building, construction equipment usage and associated greenhouse gas emissions would be slightly reduced. However, this reduction would not substantially alter the project's overall greenhouse gas emissions profile.

Operation
Operational greenhouse gas emissions under Alternative 1A would also be similar to those of the proposed project. The rehabilitated MPR would incorporate energy-efficiency improvements to the extent feasible while preserving the building's historic character. Although the rehabilitated MPR may be somewhat less energy efficient than a newly constructed administration building designed entirely to current energy-efficiency standards, the building would comply with applicable requirements of the California Building Code and California Historical Building Code. Furthermore, the retained MPR would represent only one building on the campus and any incremental increase in operational greenhouse gas emissions compared to the proposed project would be limited.

As with the proposed project, Alternative 1A would not increase student enrollment or vehicle miles traveled and would remain consistent with applicable greenhouse gas reduction plans and policies. Implementation of Mitigation Measure GHG-1 (Building Electrification and Reduction of Natural Gas Use) would further reduce operational greenhouse gas emissions through building electrification and minimization of natural gas use.

Therefore, Alternative 1A would not conflict with applicable greenhouse gas reduction plans, policies, or regulations, and greenhouse gas impacts would be **less than significant with mitigation incorporated**. No additional mitigation is required.

6.10 Hydrology and Water Quality

Less than Significant Impact

For the reasons discussed in Section 4.10.4, impacts related to water quality, stormwater runoff, groundwater recharge, flooding, and drainage would be similar to those identified for the proposed project. Alternative 1A would redevelop and modernize the existing campus and would continue to rely on existing domestic water supplies. The modernized campus would incorporate water-efficient fixtures, appliances, irrigation systems, and landscaping features that would reduce water demand compared to existing conditions.

Construction activities under Alternative 1A could result in temporary erosion, sedimentation, and pollutant discharge; however, construction would be conducted in compliance with the State Water Resources Control Board Construction General Permit through preparation and implementation of a Stormwater Pollution Prevention

Plan (SWPPP). The project site is not located within a Federal Emergency Management Agency (FEMA) Special Flood Hazard Area and would not expose people or structures to significant flood risks.

Therefore, Alternative 1A would not substantially degrade water quality, alter drainage patterns in a manner that would cause flooding, or create other significant hydrology or water quality impacts. Impacts would be **less than significant.**

6.11 Noise and Groundborne Vibrations

Less than Significant Impact with Mitigation Incorporated

The environmental and regulatory setting of Alternative 1A is the same as that described in Section 4.11 Noise and Groundborne Vibrations of this Draft EIR. Construction activities under Alternative 1A would be similar to those of the proposed project and would result in a short-term temporary increase in ambient noise levels. Construction noise could exceed the City of Fresno's ambient noise standards for residential areas and could affect on-site students. Therefore, temporary noise levels exceeding 55 dBA, would be a **significant impact**.

Groundborne vibrations associated with Alternative 1A would occur from the use of various off-road equipment such as bulldozers, vibratory rollers, and jackhammers. Vibration levels would be similar as those described for the proposed project. If high-vibratory equipment occurs near buildings resulting in architectural damage or human annoyance, groundborne vibrations impacts would a **significant impact**.

Noise and groundborne vibration impacts under Alternative 1A would be similar to the proposed project. However, with preservation of the MPR, an additional existing historic building would be present near construction activities and would be adversely affected by noise and groundborne vibrations.

Through the implementation of Mitigation Measures NOISE-1: Construction Noise and Vibration Control and Compliance and Mitigation Measures NOISE-2: Minimize Usage of Vibratory Rollers and Large Equipment Near Buildings, impacts related to noise and groundborne vibrations would **be less than significant with mitigation incorporated.** No additional mitigation is required.

6.12 Transportation

Less than Significant Impact with Mitigation Incorporated

The environmental and regulatory setting of Alternative 1A is the same as that described in Section 4.12, *Transportation*, of this Draft EIR. Because Alternative 1A is substantially similar to the proposed project except it would retain and rehabilitate the existing MPR rather than construct a replacement MPR, transportation impacts under Alternative 1A would be substantially the same as those identified for the proposed project in Section 4.12.4.

As with the proposed project, Alternative 1A would not increase student capacity, enrollment, or transportation demand and would not result in vehicle miles traveled (VMT) impacts. The alternative would not introduce roadway design features that would create hazardous conditions, nor would it impair emergency access.

Similar to the proposed project, modifications to campus circulation and access could result in conflicts between vehicles, pedestrians, and bicyclists along Kaviland Avenue and connecting roadways and could conflict with applicable City and County transportation safety objectives. Therefore, Alternative 1A would implement Mitigation

Measure TRAN-1, which requires coordination with the City and County to identify and incorporate appropriate traffic safety improvements. With implementation of Mitigation Measure TRAN-1, transportation impacts would be reduced to a **less than significant level with mitigation incorporated**. No additional mitigation is required.

6.13 Tribal Cultural Resources

Less than Significant with Mitigation Incorporated

The environmental and regulatory setting of Alternative 1A is the same as that described in Section 4.13 *Tribal and Cultural Resources* and Appendices D of this Draft EIR. There are no identified tribal cultural resources at Alternative 1A project site. There were no comments received from California Native American Tribes traditionally and culturally affiliated with the project location. There are no listed or eligible sites for listing in the California Register of Historical Resources or in a local register of historical resources. The impacts would be less than significant impact to listed or known eligible tribal cultural resources (TCRs).

Despite there being no evidence of tribal cultural resources at the project site, there still remains the potential for inadvertent discoveries of unknown TCRs during excavation activities. Therefore, mitigation measure TC-1 would be incorporated into the alternative. The impacts would **less than significant with mitigation incorporated**. No additional measures are required.

Topics That Required a Brief Level of Analysis

6.14 Agricultural and Forestry Resources

No Impact

The environmental and regulatory setting of Alternative 1A is the same as that described in Section 4.14 Agricultural and Forestry of this DEIR. For reasons stated in Section 4.14.4 the impacts are similar to the proposed project. There is no Prime Farmland, Unique Farmland, Farmland of Statewide Importance, or forest land in the project area. There would be **no impact**.

6.15 Land Use and Planning

No Impact

The environmental and regulatory setting of Alternative 1A is the same as that described in Section 4.15 Land Use and Planning of this DEIR. For reasons stated in Section 4.15.4, the impacts are similar to the proposed project. Alternative 1a would not physically divide an established community, or conflict with any applicable land use plan or policy. There would be **no impact**.

6.16 Mineral Resources

No Impact

The environmental and regulatory setting of Alternative 1A is the same as that described in Section 4.16 Mineral Resources of this DEIR. For reasons stated in Section 4.16.4, Alternative 1A would not result in the loss of a known mineral resource. There is **no impact.**

6.17 Population and Housing

No Impact

The environmental and regulatory setting of Alternative 1A is the same as that described in Section 4.17 of this DEIR. For reasons stated in Section 4.17.4 the impacts of Alterative 1A are the same and would not induce substantial population growth or displace a substantial number of housing. There would be **no impact**.

6.18 Public Services

No Impact

The environmental and regulatory setting of Alternative 1A is the same as that described in Section 4.18 Public Services of this DEIR. For reasons stated in Section 4.18.4, Alternative 1A would not alter existing public service ratios, response times or performance standards for fire or police protection and would not induce population growth or demand for new school facilities. There would be **no impact**.

6.19 Recreation

No Impact

The environmental and regulatory setting of Alternative 1A is the same as that described in Section 4.19 Recreation of this DEIR. For reasons stated in Section 4.19.4 impacts are similar to those described in the proposed project. There would be **no impact**.

6.20 Utilities and Service Systems

No Impact

The environmental and regulatory setting of Alternative 1A is the same as that described in Section 4.20 Utilities and Service Systems of this DEIR. For reasons stated in Section 4.20.4 impacts of Alternative 1A, are similar to the proposed project, Alternative 1a would not affect utility infrastructure or services such as water supply, solid waste, wastewater or power supply. There would be **no impact**.

6.21 Wildfire

No Impact

The environmental and regulatory setting of Alternative 1a is the same as that described in Section 4.21 Wildfire of this DEIR. For reasons stated in Section 4.21.4, there would be **no impact**.

Sub-Chapter 6B Project Alternative 1B Impact Analysis

Alternative 1B would retain and rehabilitate the existing MPR rather than demolish and replace it. Following rehabilitation, the MPR would continue to serve its existing function as the campus multipurpose room and cafeteria. Similar to Alternative 1A, Alternative 1B would preserve the historical significance and character-defining features of the MPR through rehabilitation. However, unlike Alternative 1A, which would adaptively reuse the rehabilitated MPR as an administrative office building and construct a new MPR, Alternative 1B would retain the MPR in its existing use and instead construct a new Administration Building at a nearby location.

The environmental and regulatory setting for Alternative 1B is the same as that described in Chapter 4, *Environmental Consequences and Mitigation Measures*, and Sub-Chapter 6A, *Project Alternative 1A Impact Analysis*.

CEQA Guidelines Section 15150 permits incorporation by reference of discussions contained elsewhere within an EIR to eliminate unnecessary repetition and focus the analysis on environmental issues relevant to decision-makers and the public. Because Alternative 1B is substantially similar to Alternative 1A and differs only in the continued use of the rehabilitated MPR as a assembly room and cafeteria, the impact analyses presented in Sub-Chapter 5A are hereby incorporated by reference.

Accordingly, for the reasons discussed under Alternative 1A, impacts related to aesthetics, air quality, biological resources, cultural resources, energy, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, population and housing, public services, recreation, transportation, tribal cultural resources, utilities and service systems, and wildfire would be the same as those identified for Alternative 1A. However, given that historical architectural resources are the sole potential significant and unavoidable impact of this DEIR, additional analysis for this topic is included below.

Historic Architectural Resources

The historic architectural resource impacts of Alternative 1B would be similar to those identified for Alternative 1A. Under both alternatives, demolition of the historically significant MPR would be avoided through retention and rehabilitation of the building. In addition, Mitigation Measures HIST-8 through HIST-14 would be applied to the MPR, as well as Buildings C and D and Building J (Library), to ensure that rehabilitation work is completed in a manner consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties.

However, unlike Alternative 1A, the rehabilitated MPR would continue to function as a multipurpose room and cafeteria, which is substantially similar to its historic use. Because the building would not be adaptively reused as an administrative office, fewer modifications would be required to accommodate a change in use. Implementation of Mitigation Measures HIST-8 through HIST-14 would reduce impacts to historical resources to a **less than significant level with mitigation incorporated**. Accordingly, Alternative 1B would result in a slightly lower impact on historical resources than Alternative 1A.

Sub-Chapter 6C No Project Alternative Impact Analysis

In accordance with Section 15126.6(e)(3)(B) of the State CEQA Guidelines, the No Project Alternative analyzes conditions under which the proposed project would not be implemented. Under this alternative, modernization of Calwa Elementary School would not occur, and no new facilities would be constructed.

Temporary and long-term construction-related impacts to aesthetics, air quality, biological resources, cultural and paleontological resources, hazards and hazardous materials, hydrology and water quality, noise, public services and utilities, and transportation and traffic would be avoided because no construction activities would take place on the project site.

The primary objective of the District is to ensure that school facilities are adequate and meet the educational needs of the community. This objective includes implementation of the Facilities Master Plan (Fresno Unified School District Master Plan 2009), which identifies anticipated short- and long-term facility needs and priorities. Under the No Project Alternative, this objective would not be achieved. The District has identified Calwa Elementary School as one of the campuses with the poorest facility conditions in the District. As a result, the District would not be able to provide equitable and inclusive facilities, improve student health and safety, or enhance campus security. As a result, the No Project Alternative would not meet the project objectives.

Sub-Chapter 6D Comparison of Alternatives and the Project

Section 15126.6 of the State CEQA Guidelines mandates that an EIR include a comparative evaluation of the proposed project with a range of reasonable alternatives to the project, which would feasibly attain most of the basic objectives of the project while simultaneously avoiding or substantially lessening any of the significant effects of the project. As stated in Section 15126.6(f)(1) of the State CEQA Guidelines:

> *[A]mong the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control, or otherwise have access to the alternative site (or the site is already owned by the proponent).*

Although these factors do not present a strict limit on the scope of reasonable alternatives to be considered, they help establish the context against which "the rule of reason" is measured when determining an appropriate range of alternatives sufficient to establish and foster meaningful public participation and informed decision-making.

Table 24 compares the results of the CEQA analysis for each resource category and identifies alternatives that would result in unavoidable significant impacts. A summary of the resources with significant impacts that can be mitigated to less than significant or unavoidable significant impacts is provided. This comparison provides the means to consider, in conformance with Section 15126.6 of the State CEQA Guidelines, factors affecting the feasibility of the alternatives, whether any of the alternatives would mitigate, avoid, or substantially lessen environmental impacts associated with the project.

6.22 Mitigated Significant Impacts

For the proposed project and Alternatives 1A and 1B, impacts related to air quality, aesthetics, archaeological resources, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, noise and vibration, transportation, and tribal cultural resources would be reduced to less-than-significant levels through implementation of mitigation measures identified in Chapter 4 and Table 24.

In addition, under Alternatives 1A and 1B, impacts to historic architectural resources associated with rehabilitation of historical resources would be reduced to less than significant levels through implementation of Mitigation Measures HIST-8 through HIST-14.

6.23 Alternatives with Unavoidable Significant Impacts

Implementation of the proposed project would require demolition of the historic Multi-Purpose Room (Building G), which is eligible for listing in the California Register of Historical Resources. Pursuant to CEQA Guidelines Section 15064.5, demolition of the building would constitute a substantial adverse change in the significance of a historical resource and would result in a significant and unavoidable impact.

Mitigation Measures HIST-1 through HIST-7 would require documentation, archival recordation, interpretive treatment, oral history collection, and evaluation of salvage opportunities. While these measures would reduce the severity of the impact and preserve information regarding the resource, they would not avoid demolition of the building. Accordingly, the impact would remain significant and unavoidable.

Unlike the proposed project, Alternatives 1A and 1B would retain and rehabilitate the historic MPR, thereby avoiding demolition of a historical resource. Consequently, neither Alternative 1A nor Alternative 1B would result in significant and unavoidable impacts.

6.24 Ability of Alternatives to Meet Project Objectives

See Section 6.E for a discussion of the Alternative Projects' Ability to Meet Project Objectives.

6.25 Environmentally Superior Alternative

CEQA Guidelines Section 15126.6(e)(2) requires identification of the environmentally superior alternative among those analyzed.

The No Project Alternative would result in the fewest environmental impacts because modernization activities would not occur and the historic MPR would remain in place. Accordingly, the No Project Alternative is the environmentally superior alternative.

However, because CEQA requires identification of the environmentally superior alternative among the action alternatives when the No Project Alternative is environmentally superior, Alternatives 1A and 1B were compared to determine which alternative would provide the greatest environmental benefit while still achieving the project's objectives.

Both Alternative 1A and Alternative 1B would avoid the significant and unavoidable impact to one historical resource associated with demolition of the MPR and would reduce all environmental impacts to less than significant levels with mitigation incorporated. However, Alternative 1B would retain the historic MPR in its original function as a multipurpose facility for assemblies and cafeteria, thereby requiring fewer alterations to the historic resource than Alternative 1A, which would convert the building to administrative use.

Accordingly, Alternative 1B is identified as the Environmentally Superior Action Alternative.

6.26 Conclusion

The proposed project would fully achieve the District's objectives but would result in a significant and unavoidable impact associated with demolition of the historic MPR.

Alternatives 1A and 1B would avoid this significant and unavoidable impact through retention and rehabilitation of the historic MPR while still substantially achieving the District's modernization objectives. Alternative 1B would provide the greatest degree of historic preservation by retaining the MPR in its existing use and therefore represents the environmentally superior action alternative.

The No Project Alternative would result in the fewest environmental impacts but would not achieve the District's objectives and would not address existing facility deficiencies at Calwa Elementary School.

As required by CEQA, the District must balance the environmental benefits of the alternatives against the project's educational, operational, financial, and public-service objectives when considering approval of the proposed project. If the District elects to approve the proposed project despite its significant and unavoidable impact to historical resources, it would be required to adopt a Statement of Overriding Considerations pursuant to CEQA Guidelines Section 15093.

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Appendix A: Public Comments Received

Appendix B: Air Quality and Greenhouse Gas Impact Analysis

Appendix C: Historic Architecture Survey Report

Appendix D: Archeological Resources Survey Report

Appendix E: Summary of AB 52 Correspondence

Appendix F: Phase I Environmental Site Assessment

Appendix G: Physical Safe Route to School Analysis

Appendix H: Historic Rehabilitation Feasibility Evaluation