

INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

CITY OF CHOWCHILLA

AFFORDABLE MULTI-FAMILY HOUSING PROJECT- TENTATIVE TRACT MAP No. 22-0011



MARCH 2026



INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

AFFORDABLE MULTI-FAMILY HOUSING PROJECT- TENTATIVE TRACT MAP No. 22-0011

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ACRONYMS AND ABBREVIATIONS

§	Section
AAQA	ambient air quality analysis
AAQS	ambient air quality standards
AB	Assembly Bill
ACMs	asbestos-containing materials
ALUCP	Airport Land Use Compatibility Plan
APNs	Assessor Parcel Numbers
AQAP	Air Quality Attainment Plans
AQIA	Air Quality Impact Assessment
AQP	air quality plans
ART	Archaeological Resources Technology
ATP	Active Transportation Plan
AWSC	All-Way Stop Control
BMPS	Best Management Practices
CAA	Clean Air Act
CalGEM	California Geothermal Energy Management Division
Caltrans	California Department of Transportation
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CATX	Chowchilla Area Transit
CBC	California Building Code
CC	Community Commercial
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CH ₄	Methane
City	City of Chowchilla
CNDDB	California Natural Diversity Database
CNEL	Community Noise Equivalent Level
CO	carbon dioxide
CO ₂	carbon dioxide
CO ₂ e	carbon dioxide equivalent
County	County of Madera
CRM	Commercial, Rural, Median
CVFD	Chowchilla Volunteer Fire Department
CWA	Clean Water Act
dB	decibel
DIF	development impact fee
DOC	Department of Conservation
DTSC	Department of Toxic Substances Control
EIR	Environmental Impact Report
EIR	Environmental Impact Report
EO	Executive Order

EVs	electric vehicles
FMMP	Farmland Mapping and Monitoring Program
GAMAQI	Guidance for Assessing and Mitigating Air Quality Impacts
GHG	greenhouse gas
GSP	Groundwater Sustainability Plan
HCP	Habitat Conservation Plan
H-D	High-Density Residential
HDR	High-Density Residential
HI	Hazard Index
HRA	Health Risk Assessment
HSC	Health and Safety Code
HUD	Housing and Urban Development
HVAC	heating, ventilation, and air conditioning
HWMP	Hazardous Waste Management Plan
IS	Initial Study
ITE	Institute of Transportation Engineers
LAFCo	Local Agency Formation Commission
LBP	lead-based paint
LOS	Level of Service
LRA	Local Responsibility Area
MCC	Madera County Connection
MCLHMP	Madera County Local Hazard Mitigation Plan
MCTC	Madera County Transportation Commission
MCTC Model	Madera County Transportation Commission's Travel Demand Model
MCTDM	Madera County Travel Demand Model
MDB&M	Mount Diablo Base and Meridian
MDR	Medium-Density Residential
MEI	Maximally Exposed Off-site Individual
mgd	million gallons per day
MM	Mitigation Measure
MMRP	Mitigation Monitoring and Reporting Program
MND	Mitigated Negative Declaration
MND	Mitigated Negative Declaration
MRZ-1	Mineral Resources Zone 1
MS4s	Municipal Separate Storm Sewer Systems
MT	metric tons
N ₂ O	nitrous oxide
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NCCP	Natural Community Conservation Plan
NCHRP	National Cooperative Highway Research Program
NO ₂	nitrogen dioxide
NO _x	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
NWI	National Wetland Inventory

OWSC	One-Way Stop Control
PG&E	Pacific Gas and Electric Company
PM ₁₀	Particulate Matter 10 Microns or Smaller
PM _{2.5}	Particulate Matter 2.5 Microns or Smaller
ppb	Parts per billion
PRC	Public Resources Code
REC	recognized environmental concern
R-H	High-Density Residential
ROG	reactive organic compounds
RRS	Residential, Rural, Single-Family
RTP	Regional Transportation Plan
SB	Senate Bill
SCS	Sustainable Communities Strategy
SHTAC	Swainson's Hawk Technical Advisory Committee
SJVAB	San Joaquin Valley Air Basin
SJVAPCD	San Joaquin Valley Air Pollution Control District
SMGB	State Mining and Geology Board
SO ₂	sulfur dioxides
SOI	Sphere of Influence
SO _x	sulfur oxides
SPRR	Southern Pacific Railroad
SR	State Route
SSJVIC	Southern San Joaquin Valley Information Center
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TACs	Toxic Air Contaminants
TAZs	traffic analysis zones
TIS	Traffic Impact Study
TTM	Tentative Tract Map
TWLT	two-way left-turn
TWSC	two-way stop control
USDA	United States Department of Agriculture
USEPA	United States Environmental Protection Agency
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
UWMP	Urban Water Management Plan
VMT	Vehicles Miles Traveled
VOCs	volatile organic compounds
WDRs	waste discharge requirements
WUI	wildland urban interface
WWTP	Wastewater Treatment Plant

MITIGATED NEGATIVE DECLARATION

As Lead Agency under the California Environmental Quality Act (CEQA), the City of Chowchilla (City) reviewed the Project described below to determine whether it could have a significant effect on the environment because of its development. In accordance with CEQA Guidelines Section 15382, “[s]ignificant effect on the environment” means a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the Project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance.

Project Name

Affordable Multi-Family Housing Project – Tentative Tract Map No. 22-0011

Project Location

The Project site and the Annexation Only Area are located in an unincorporated area of southwest Madera County, directly adjacent to the southwest limits of the City of Chowchilla. The Project consists of Assessor Parcel Numbers (APNs), the Project site is APN 026-233-008, and the Annexation Only Area are APNs 026-233-007, -009, and -010, with a combined total of approximately 42.57 acres.

The Project is within Sections 31 and 36, Township 9S, Range 15E and 16E, Mount Diablo Base and Meridian (MDB&M), of the Chowchilla U.S. Geological Survey (USGS) Quad Map. The site is generally bound by Roberston Boulevard (State Route 233) to the northwest and the City of Chowchilla to the northeast. The surrounding land uses are single-family residential subdivision and agricultural land to the north, agricultural land and rural residential housing to the east, agricultural land to the south, and rural residential housing to the west.

Project Description

Project site: This term refers to the approximately 18.24-acre parcel (APN 026-233-008) to be developed as part of TTM No. 22-0011. The Project site is currently an undeveloped field and is zoned Residential, Rural, Single-Family District (RRS) and Commercial, Rural Median District (CRM) within the County of Madera. The Project site is located in an unincorporated area of southwest Madera County, directly adjacent to the southwest limits of the City of Chowchilla and within the City’s Planning Area and Sphere of Influence (SOI). The entire 18.24-acre parcel would be annexed into the City of Chowchilla and pre-zoned to High-Density Residential (R-H), consistent with the City’s High-Density Residential (HDR) land use designation.

The Project site will consist of the following components:

- The northeastern portion of the parcel will be subdivided into 17 lots that are planned for the development of 17 three-bedroom/two-bathroom duplex homes (34 units) on 7.85 acres.
- The central and western portions of the parcel will be developed in two phases that will include a total of 18 two-story apartment complexes with a total of 154 apartment units on 10.39 acres.
- The apartments would be constructed as:
 - 100 percent below-market-rate affordable housing units.
 - 60 percent three-bedroom units.
 - 40 percent two-bedroom units.
 - One percent will be one-bedroom units.
- Adequate parking will be provided throughout the complex adjacent to apartment buildings.
- A clubhouse, management office, and pool will be developed near the western Project site boundary.
- The following Outlots along the eastern Project site boundary are designated as:
 - Outlot A is designated for a pond and park.
 - Outlot B is designated as an emergency/fire access road and a recreation trail.
 - Outlot C is designated as open space and recreation trail.
- On- and off-site improvements, including circulation roads, interior local streets, street lighting, curb, gutter, sidewalk, open space, and landscaping, are proposed as part of the Project. The Project site will construct an internal road that connects the existing Lincoln Avenue on the north Project boundary to the existing Road 15 on the west Project boundary. Primary access to the duplexes will be from Lincoln Avenue and internal circulation roads, and primary access to the apartments will be from Road 15. Sewer, water, and storm drain services would be provided by the City. Electricity will be provided by PG&E.

Annexation Only Area: This term refers to the three unincorporated parcels (APNs 026-233-007, 026-233-009, and 026-233-010) totaling 45 acres, to the southwest adjacent to the Project site Area. APN 026-233-007 is currently an agricultural orchard, and APNs 026-233-009 and -010 are currently developed with rural residential homes. The Annexation Only Area will be annexed into the City and pre-zoned to High-Density Residential (H-D), consistent with the City's Land Use Element Map. No development or changes in land use are proposed for the Annexation Only Area. Any future development or change in land use may require additional environmental review and analysis.

Buildout: The Project site will be constructed in two phases, as outlined below.

Phase 1 and Phase 2 – a total of 188 residential units: Construction is planned in two phases and is anticipated to begin in spring 2027. There is an existing metal warehouse building at the southwest corner of the property that will be demolished prior to the start of construction. Phase 1 consists of the 6.31-acre western portion of the multi-family development and is anticipated to be completed in spring 2029. Phase 2 would then begin in fall 2029 and would be completed in fall 2031. The duplexes will likely be constructed

concurrently with the multi-family apartments development; therefore, between 2027 and 2031.

Discretionary Actions: The following discretionary entitlements are required for the proposed Project:

- General Plan Amendment
- Prezoning
- Annexation
- Tentative Tract Map No. 22-0011
- Development Permit No. 22-0011

It is anticipated that the following equipment would be used during construction activities:

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

Mailing Address and Phone Number of Contact Person

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Findings

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

Mitigation Measures Included in the Project to Avoid Potentially Significant Effects

MM AES-1: Prior to issuance of ground disturbance along Robertson Boulevard, the developer or contractor shall implement the following measures:

- a. Indicate on the plans which, if any, of the existing palm trees' construction will be impacted during construction activities. If construction cannot avoid the palm trees, the developer or contractor shall hire a qualified botanist, arborist, or other professional to relocate the impacted trees to a new location in close proximity. A copy of the contract with the qualified professional shall be submitted to the City as proof of compliance.
- b. The developer shall routinely care for and maintain the relocated tree(s) for at least one year after the relocation to ensure the plant's survival. A report shall be submitted to the City at the end of the 12-month period that illustrates the success of the relocation.

MM AIR-1: During construction of the proposed Project, the Project contractor shall ensure all off-road, diesel-powered construction equipment of 50 horsepower or more used for the Project construction meets, at a minimum, the California Air Resources Board Tier 2 emissions standards equipped with Level 3 diesel particulate filters or the equivalent.

MM BIO-1: To avoid impacts to nesting Swainson's hawks, construction activities shall occur, where possible, outside the nesting season, typically defined as March 1 to September 15.

MM BIO-2: If project-related activities must occur between March 1 and September 15, a qualified biologist shall conduct surveys prior to the start of construction for active Swainson's hawk nests within a half mile of the site in accordance with the *Swainson's Hawk Technical Advisory Committee (SHTAC) (2000)* guidelines. The guidelines define five survey periods for Swainson's hawk: Period I: January 1-March 20; Period II: March 20-April 5; Period III: April 5-April 20; Period IV: April 21-June 10; and Period V: June 10-July 30. The guidelines prescribe a minimum of three surveys per survey period for at least the two survey periods immediately prior to a project's initiation, and specifically recommend that surveys be completed in Periods II, III, and V. A copy of the surveys' results shall be provided to the City prior to the issuance of grading or building permits.

MM BIO-3: Should any active Swainson's hawk nests be discovered within the survey area, an appropriate disturbance-free buffer shall be established based on local conditions and agency guidelines. Disturbance-free buffers shall be maintained until a qualified biologist has determined that the young have fledged and are capable of foraging independently.

MM BIO-4: If feasible, the Project shall be implemented outside of the avian nesting season, typically defined as February 1 to August 31.

MM BIO-5: If construction must occur between February 1 and August 31, a qualified biologist shall conduct pre-construction surveys for active bird nests within 10 days prior to the start of construction. The survey area shall encompass the site and accessible surrounding lands within 250 feet for nesting migratory birds and 500 feet for raptors (i.e., birds of prey).

MM BIO-6: Should any active nests be discovered in or near proposed construction zones, the biologist shall identify a suitable construction-free buffer around the nest. This buffer

shall be identified on the ground with flagging or fencing and shall be maintained until the biologist has determined that the young have fledged and are capable of foraging independently.

MM CUL-1: In the event that a concentration of artifacts or culturally modified soil deposits (including trash pits older than 50 years) is discovered at any time during Project construction, all work shall stop until a qualified archaeologist views the find to make a preliminary evaluation. If warranted, further archaeological work in the discovery area should be performed. A copy of all reports shall be provided to the City

MM CUL-2: In the event that human remains are unearthed during excavation and grading activities of any development at the Project, all activity shall cease immediately. Pursuant to Health and Safety Code (HSC) Section 7050.5, no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98(a). If the remains are determined to be of Native American descent, the coroner shall, within 24 hours, notify the NAHC. The NAHC shall then contact the most likely descendant of the deceased Native American, who shall then serve as the consultant on how to proceed with the remains. Pursuant to PRC Section 5097.98(b), upon the discovery of Native American remains, the landowner shall ensure that the immediate vicinity, according to generally accepted cultural or archaeological standards or practices, where the Native American human remains are located is not damaged or disturbed by further development activity until the landowner has discussed and conferred with the most likely descendants regarding their recommendations, if applicable, taking into account the possibility of multiple human remains. The landowner shall discuss and confer with the descendants all reasonable options regarding the descendants' preferences for treatment.

MM GEO-1: Prior to ground-disturbing activities, the Project proponent/developer shall prepare and implement a SWPPP that specifies BMPs, with the intent of keeping all products of erosion from moving off-site. The SWPPP shall include a site map that shows the construction site perimeter, existing and proposed manmade facilities, stormwater collection and discharge points, general topography both before and after construction, and drainage patterns across the Project site. Additionally, the SWPPP shall contain a visual monitoring program and a chemical monitoring program for non-visible pollutants to be implemented (if there is a failure of best management practices). The requirements of the SWPPP and BMPs shall be incorporated into design specifications and construction contracts. Recommended best management practices for the construction phase may include the following:

- Stockpiling and disposing of demolition debris, concrete, and soil properly.
- Protecting any existing storm drain inlets and stabilizing disturbed areas.
- Implementing erosion controls.
- Properly managing construction materials.
- Managing waste, aggressively controlling litter, and implementing sediment controls.

MM GEO-2: A civil engineer or soils engineer registered in California shall complete a Soils Investigation and Evaluation Report during the preparation of the improvement plans, once

determined. The investigation and subsequent report shall provide detailed recommendations for structural configurations, locations, foundations, footings, drainage, and other items as necessary, for review and approval by the Public Works Department.

MM GEO-3: In the event that unique paleontological or geological resources are discovered during excavation and/or construction activities, construction shall stop in the immediate vicinity of the find, and a qualified paleontologist shall be consulted to determine whether the resource requires further study. The qualified paleontologist shall make recommendations to the City on the measures that shall be implemented to protect the discovered resources, including but not limited to excavation of the finds and evaluation of the finds. If the resources are determined to be significant, mitigation measures shall be identified by the monitor and recommended to the Lead Agency. Appropriate mitigation measures for significant resources could include avoidance or capping, incorporation of the site in green space, parks, or open space, or data recovery excavations of the finds. No further grading shall occur in the area of the discovery until the Lead Agency approves the measures to protect these resources. Any paleontological/geological resources recovered as a result of mitigation shall be provided to a City-approved institution or person who is capable of providing long-term preservation to allow future scientific study.

MM HAZ-1: Prior to demolition of the existing warehouse structure, a qualified professional shall be retained. The inspector shall be present on-site during demolition and excavation of the existing concrete-lined inspection pits, to assess the subsurface condition inside the pits and to collect soil samples, as necessary. All findings shall be reported in writing to the City of Chowchilla.

If inspection of the pits and analysis of soil samples indicate no significant contamination screening levels, then no further action is needed. If warranted, additional remediation may include, but is not limited to, the removal of the contaminated soil and disposal at a qualified disposal facility and bringing in clean soil.

MM HAZ-2: During construction activities, in the event an unknown underground storage tank(s) or a septic system is uncovered or damaged during excavation or grading activities, all work in that area shall cease. The State Water Resources Control Board (SWRCB) and the Madera County Environmental Health Division shall be contacted to determine what appropriate remediation may be required and to identify the appropriate requirements and approvals. A report of all communication and the determination made by the SWRCB and the County Public Health Division shall be submitted to the City.

MM HAZ-3: Prior to the start of the demolition of any existing structures on the Project site, a hazardous materials assessment of the existing building shall be performed by a certified asbestos consultant, notification shall be submitted to the SJVAPCD, and any abatement requirements shall be completed in order to obtain an approved demolition permit. A copy of the approved permit shall be submitted to the City as evidence of compliance.

If no regulated hazardous materials, such as lead-based paint or asbestos, are found during the assessment, no further action is necessary. A copy of that report shall be provided to the City as evidence of compliance.

MM HYD-1: Prior to building permit issuance, the developer/Project proponent shall obtain a will-serve letter from the City's Water Division.

MM HYD-2: Prior to building permit issuance, the applicant/developer/Project proponent shall obtain a will-serve letter from the City's Stormwater Division.

MM NSE-1: Whenever feasible, the construction contractor shall:

- a. Place all stationary construction equipment so that emitted noise is directed away from sensitive receptors, including the existing residences on Road 15, and those located at the northeast corner of the Project site. This includes noise-generating equipment such as portable generators, etc.
- b. The construction contractor shall locate equipment staging in areas that will create the greatest possible distance between construction-related noise sources and noise-sensitive receptors nearest the Project site during all Project construction.
- c. The construction contractor shall ensure that all construction equipment is equipped with manufacturer-approved mufflers and baffles.
- d. Project construction hours shall comply with City Noise Element Policy N 4.6: The City of Chowchilla shall limit construction activities to the hours of 7:00 a.m. to 7:00 p.m., Monday through Saturday. No construction shall occur on Sundays or national holidays without a permit from the City.

MM TRA-1: Prior to Certificate of Occupancy being issued, the Project Proponent shall pay its fair share, as determined by the City's Development DIF program, for the cost of improvements to the Robertsons Boulevard/SR 233 intersection.

MM UTL-1: Prior to building permit issuance, the developer/Project proponent shall obtain a will-serve letter from the City's Water Division to verify the City's Wastewater Division.

SECTION 1 - INTRODUCTION

1.1 - Overview

The Project site and Annexation Only Area are located in an unincorporated area of southwest Madera County, directly adjacent to the southwest limits of the City of Chowchilla and within the City's Planning Area and SOI. The Project site proposes to develop a total of 188 multi-family units, consisting of 34 duplex units in a 17-lot subdivision and 154 apartment units. Three unincorporated parcels (APNs 026-233-007, 026-233-009, and 026-233-010), identified as the Annexation Only Area, will be annexed into the City of Chowchilla limits as part of this environmental review. No development or change in use is proposed for the Annexation Only Area.

The following discretionary entitlements are required for the proposed Project:

- Tentative Tract Map No. 22-0011
- Development Permit No. 22-0011

1.2 - California Environmental Quality Act

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

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

1.3 - Impact Terminology

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

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

environment with the inclusion of environmental commitments that have been agreed to by the proponent.

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

1.4 - Document Organization and Contents

The content and format of this IS/MND are designed to meet the requirements of CEQA. The report contains the following sections:

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

1.5 - Incorporated by Reference

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

- Madera County General Plan and Environmental Impact Report (EIR) (1995)
- City of Chowchilla General Plan and EIR (2010)
- City of Chowchilla Municipal Code
- Madera Countywide Airport Land Use Compatibility Plan (2015)
- Madera County Local Hazard Mitigation Plan Update (2017)

SECTION 2 - PROJECT DESCRIPTION

2.1 - Introduction

Tentative Tract Map and Development Permit Application No. 22-0011 (TTM No. 22-0011) were filed by the applicant, Cen Cal Builders & Developer, Inc.

For the purposes of this Mitigated Negative Declaration (MND), the following terms will be used to distinguish the separate components being analyzed in this Project:

The Project site and Annexation Only Area are located in an unincorporated area of southwest Madera County, directly adjacent to the southwest limits of the City of Chowchilla and within the City's Planning Area and SOI. The Project site proposes to develop a total of 188 multi-family units, consisting of 34 duplex units in a 17-lot subdivision and 154 apartment units. Three unincorporated parcels (APNs 026-233-007, APN 026-233-009, and APN 026-233-010), identified as the Annexation Only Area, will be annexed into the City of Chowchilla limits as part of this environmental review. No development or change in use is proposed for the Annexation Only Area.

Figures included at the end of Section 2 are as follows:

- Figure 2-1: Regional Location
- Figure 2-2: City Limits and SOI
- Figure 2-3: Project Site
- Figure 2-4: Proposed Land Use Designations
- Figure 2-5: Existing Zoning
- Figure 2-6: Proposed Pre-zoning
- Figure 2-7: Tentative Tract Map No. 22-0011
- Figure 2-8: Apartment Site Plan
- Figure 2-9: Duplex Site Plan

2.2 - Project Location

The Project site and the Annexation Only Area are located in an unincorporated area of southwest Madera County, directly adjacent to the southwest limits of the City of Chowchilla. The Project consists of APNs; the Project site is APN 026-233-008, and the Annexation Only Area are APNs 026-233-007, -009, and -010, totaling approximately 45 acres.

2.3 - Surrounding Land Uses

The site is generally bound by Roberston Boulevard (State Route 233) to the northwest, the City of Chowchilla to the northeast, and is bisected by Road 15. The surrounding land uses are single-family residential subdivision and agricultural land to the north, agricultural land and rural residential housing to the east, agricultural land to the south, and rural residential housing to the west.

2.4 - Existing Conditions

The Project site was historically cultivated agriculture but is currently an undeveloped field. The Annexation Only Area is currently developed with rural residential homes and an agricultural orchard. The Project site was historically used for commercial agriculture. There is an existing metal warehouse building at the southwest corner of the property that will be demolished prior to the start of construction.

2.5 - Proposed Project

Project site: This term refers to the approximately 18.24-acre parcel (APN 026-233-008) to be developed as part of TTM No. 22-0011. The Project site is currently an undeveloped field and is zoned Residential, Rural, Single-Family District (RRS) and Commercial, Rural Median District (CRM) within the County of Madera. The Project site is located in an unincorporated area of southwest Madera County, directly adjacent to the southwest limits of the City of Chowchilla and within the City's Planning Area and Sphere of Influence (SOI). The entire 18.24-acre parcel would be annexed into the City of Chowchilla and pre-zoned to High Density Residential (R-H), consistent with the City's High Density Residential (HDR) land use designation.

The Project site will consist of the following components:

- The northeastern portion of the parcel will be subdivided into 17 lots that are planned for the development of 17 three-bedroom/two-bathroom duplex homes (34 units) on 7.85 acres.
- The central and western portions of the parcel will be developed in two phases that will include a total of 18 two-story apartment complexes with a total of 154 apartment units on 10.39 acres.
- The apartments would be constructed as:
 - 100 percent below-market-rate affordable housing units.
 - 60 percent three-bedroom units.
 - 40 percent two-bedroom units.
 - One percent will be one-bedroom units.
- Adequate parking will be provided throughout the complex adjacent to apartment buildings.
- A clubhouse, management office, and pool will be developed near the western Project site boundary.
- The following Outlots along the eastern Project site boundary are designated as:
 - Outlot A is designated for a pond and park.
 - Outlot B is designated as an emergency/fire access road and a recreation trail.
 - Outlot C is designated as open space and recreation trail.
- On- and off-site improvements, including circulation roads, interior local streets, street lighting, curb, gutter, sidewalk, open space, and landscaping, are proposed as part of the Project. The Project site will construct an internal road that connects the

existing Lincoln Avenue on the north Project boundary to the existing Road 15 on the west Project boundary.

- Primary access to the duplexes will be from Lincoln Avenue and internal circulation roads, and primary access to the apartments will be from Road 15. Sewer, water, and storm drain services would be provided by the City. Electricity will be provided by PG&E.

Annexation Only Area: This term refers to the three unincorporated parcels (APNs 026-233-007, 026-233-009, and 026-233-010) totaling 45 acres, to the southwest adjacent to the Project site Area APN 026-233-007 is currently an agricultural orchard, and APNs 026-233-009 and -010 are currently developed with rural residential homes. The Annexation Only Area will be annexed into the City and pre-zoned to High Density Residential (H-D), consistent with the City's Land Use Element Map. No development or changes in land use are proposed for the Annexation Only Area. Any future development or change in land use may require additional environmental review and analysis.

Buildout: The Project site will be constructed in two phases, as outlined below.

Phase 1 and Phase 2 – a total of 188 residential units: Construction is planned in two phases and is anticipated to begin in spring 2027. There is an existing metal warehouse building at the southwest corner of the property that will be demolished prior to the start of construction. Phase 1 consists of the 6.31-acre western portion of the multi-family development and is anticipated to be completed in spring 2029. Phase 2 would then begin in fall 2029 and would be completed in fall 2031. The duplexes will likely be constructed concurrently with the multi-family apartments development; therefore, between 2027 and 2031.

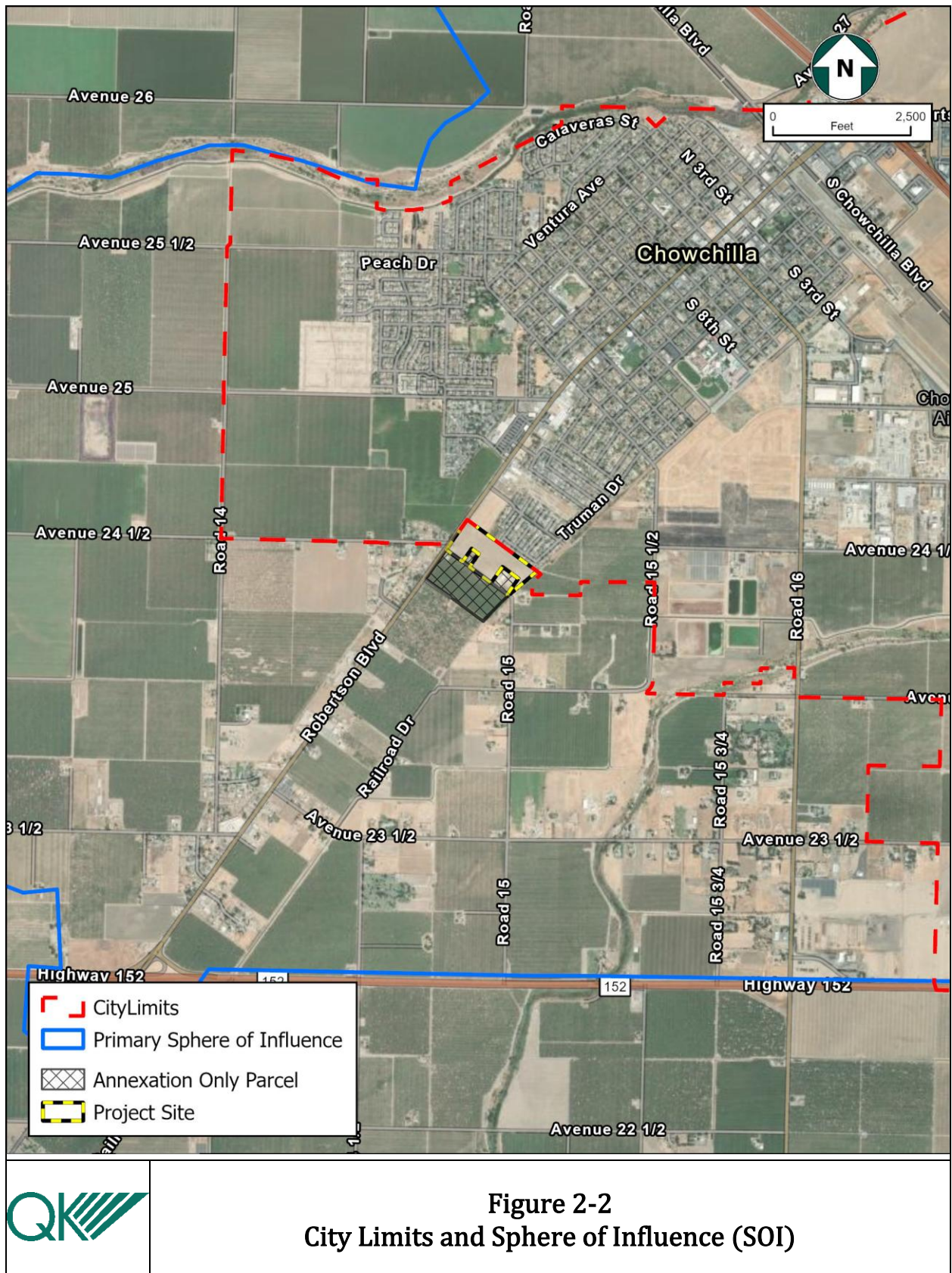
Discretionary Actions: The following discretionary entitlements are required for the proposed Project:

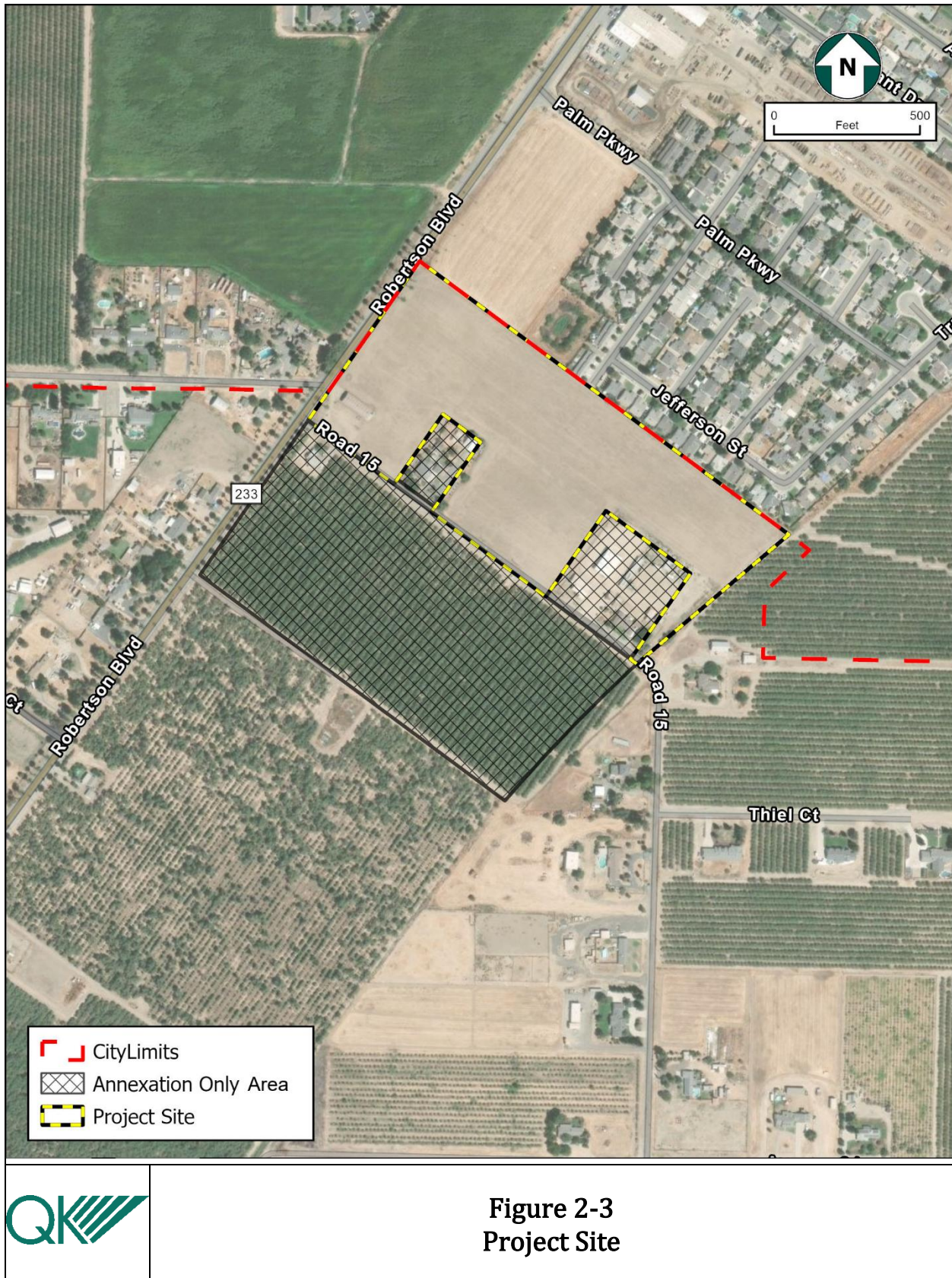
- General Plan Amendment
- Prezoning
- Annexation
- Tentative Tract Map No. 22-0011
- Development Permit No. 22-0011

It is anticipated that the following equipment would be used during construction activities:

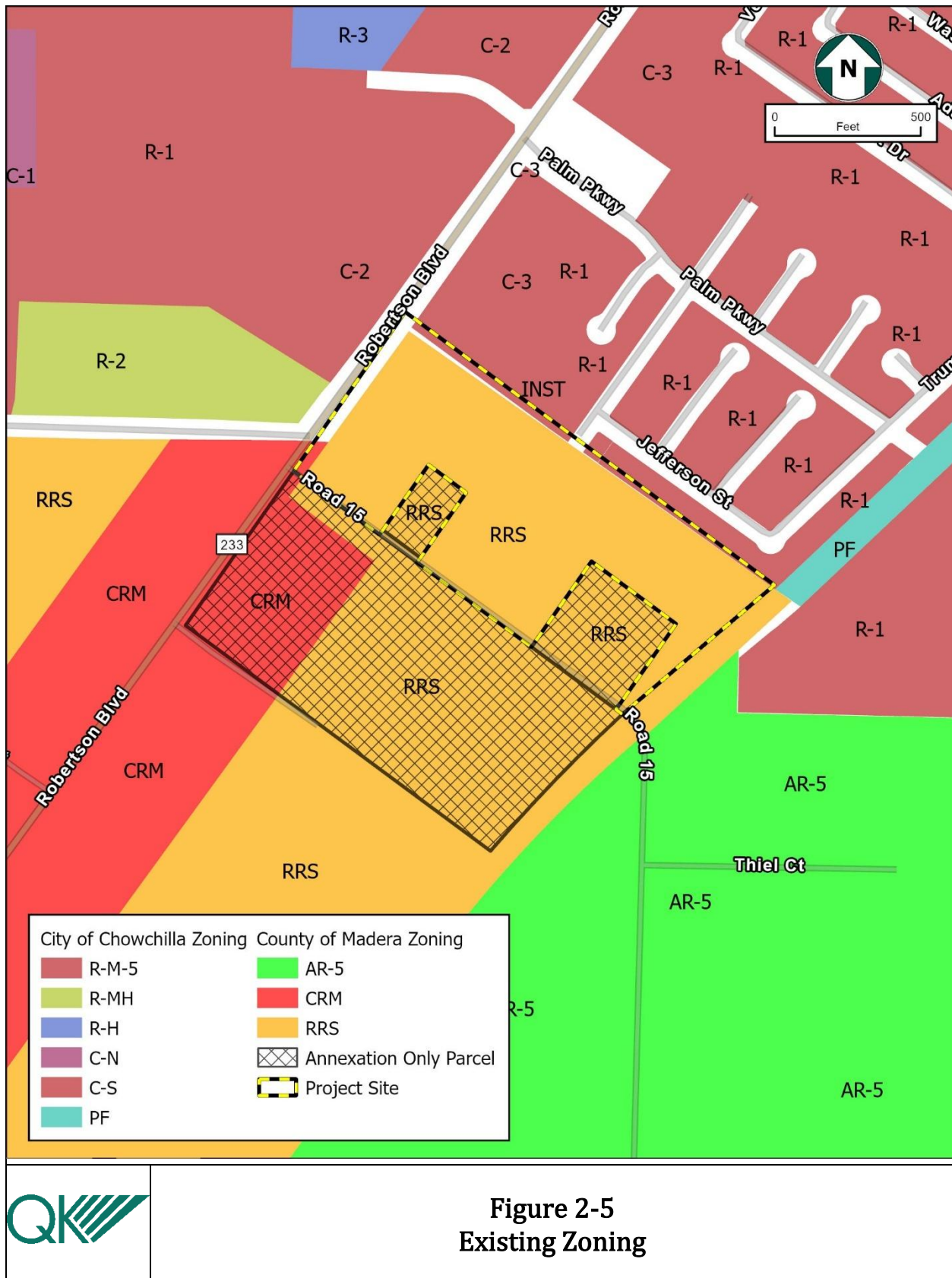
- Roller
- Loaded trucks
- Excavator
- Generator
- Service truck
- Air compressor

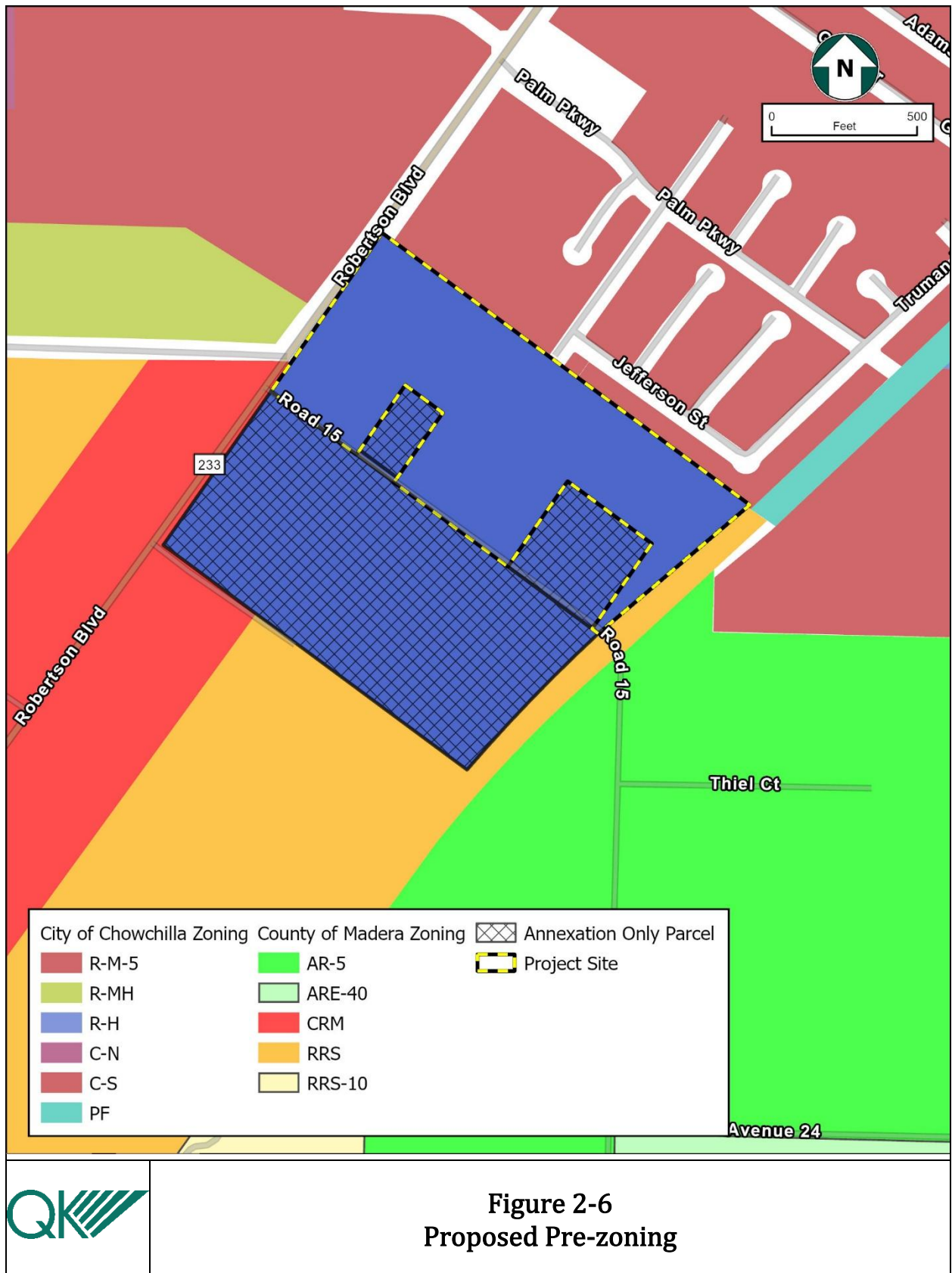












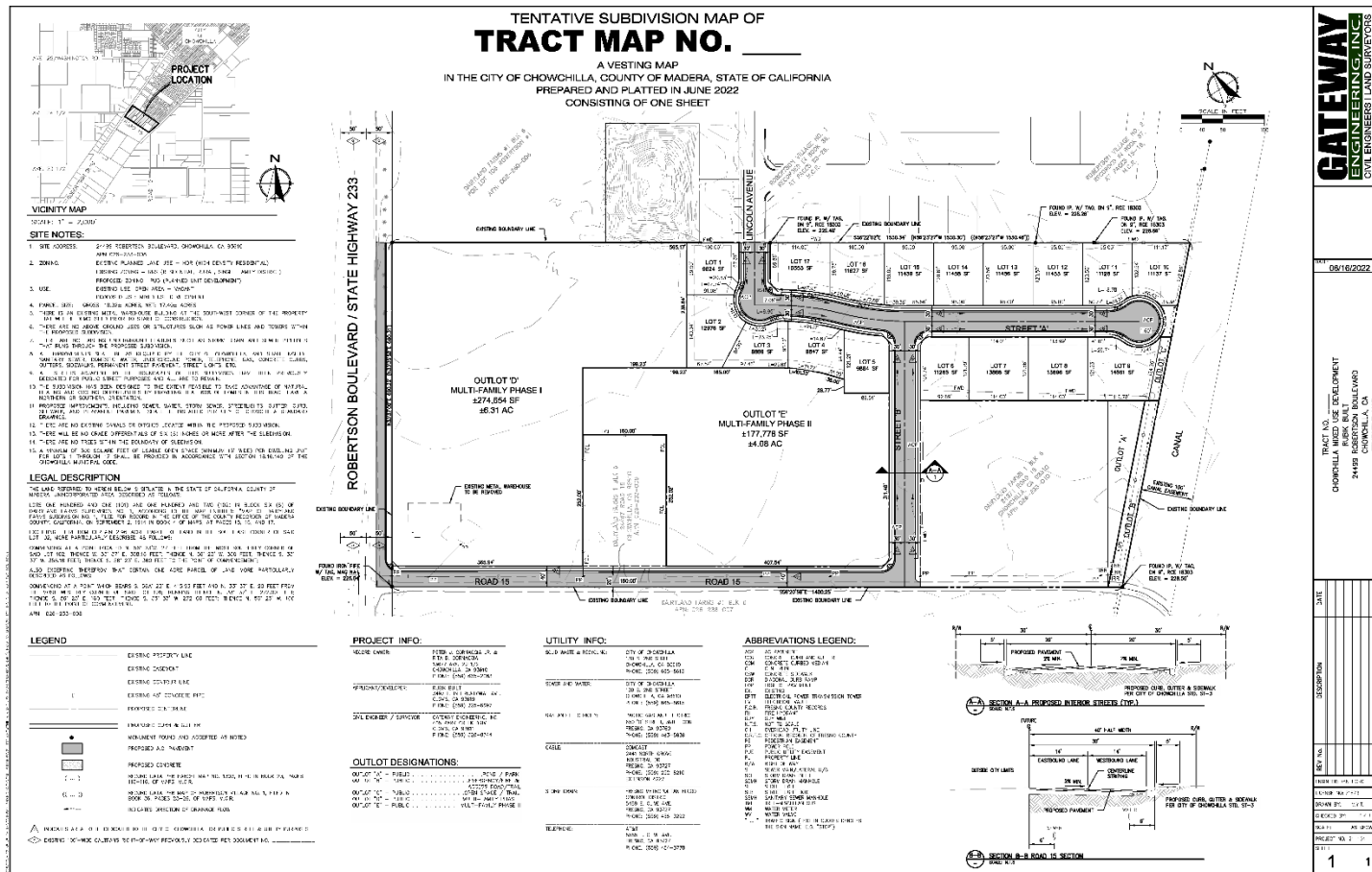
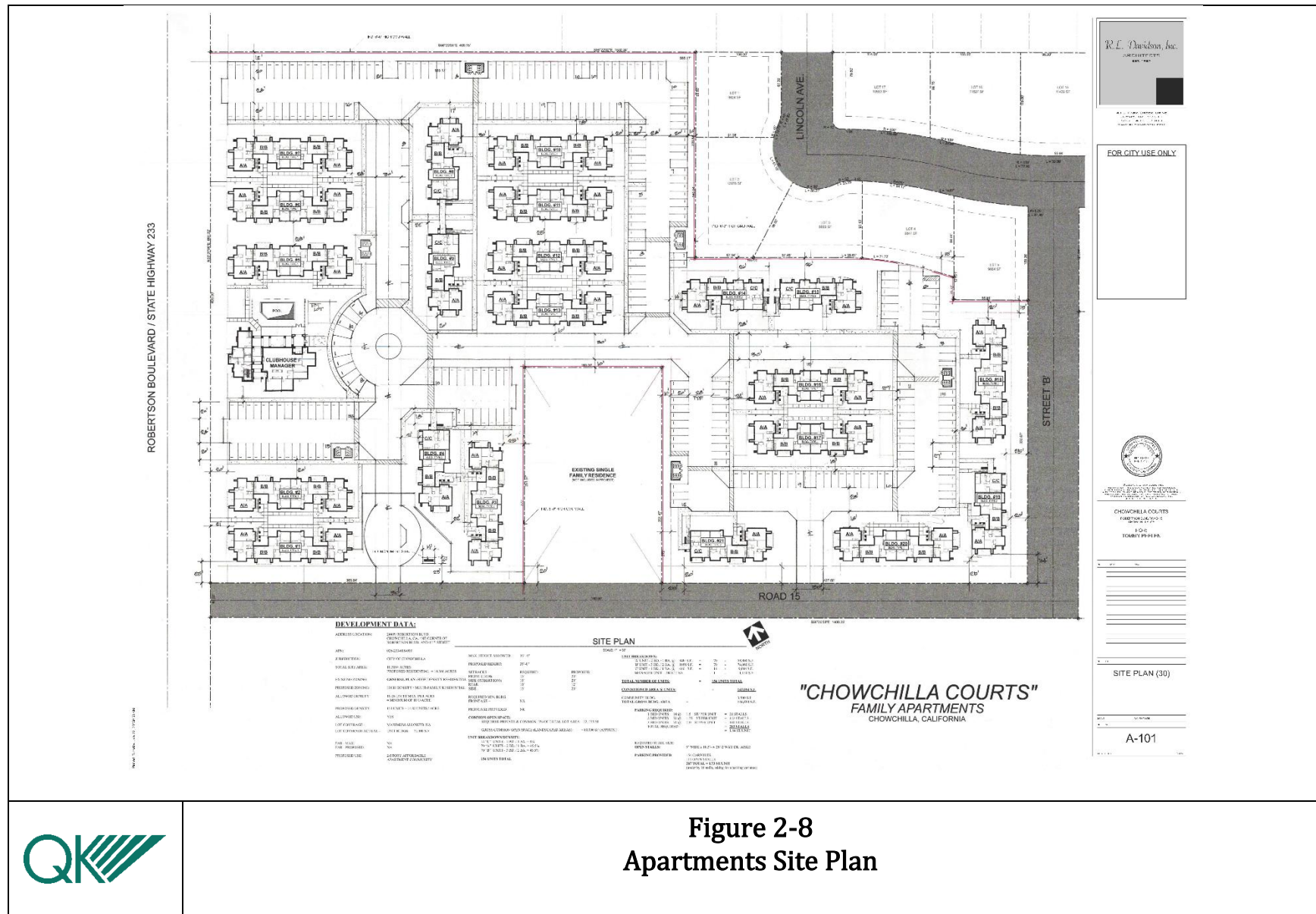


Figure 2-7
Tentative Tract Map No. 22-0011



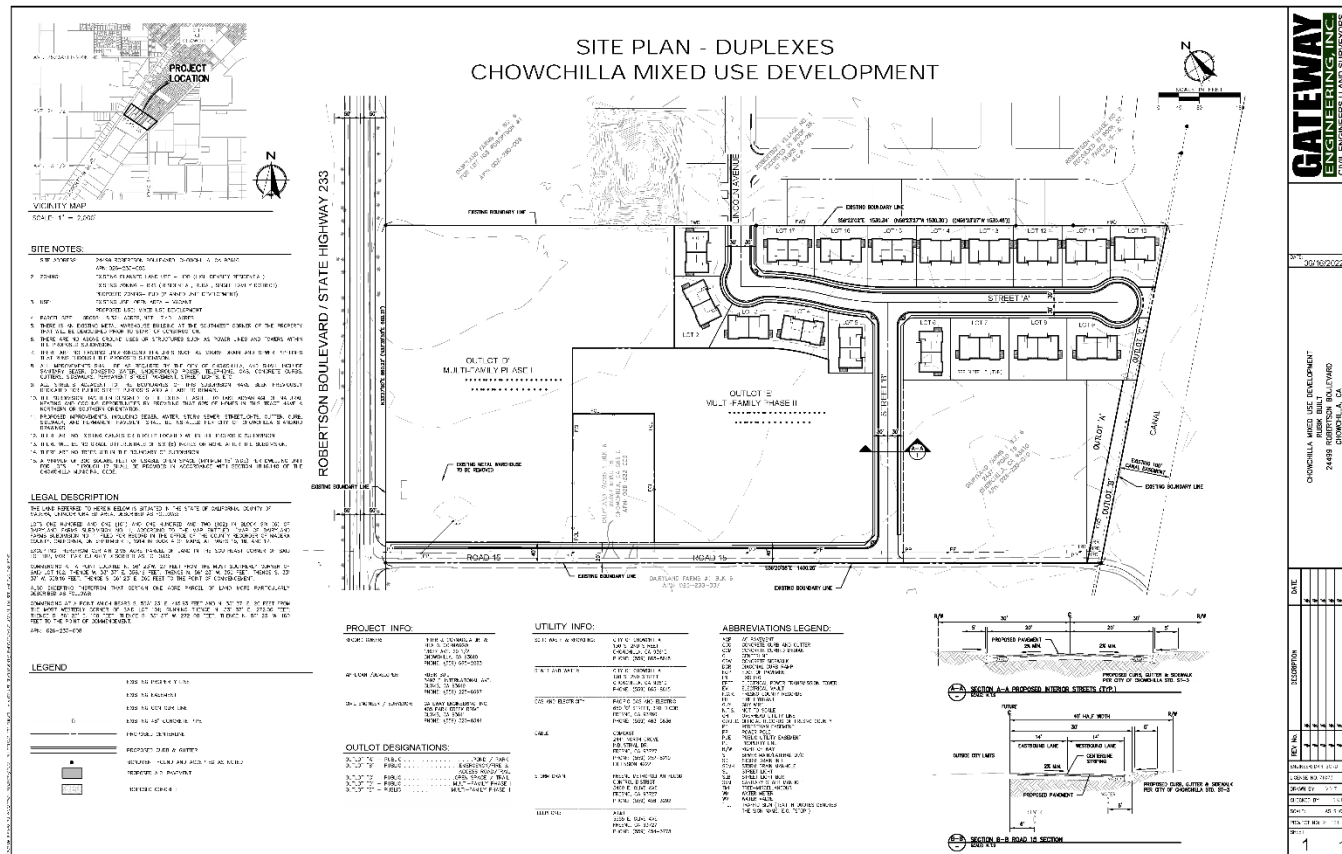


Figure 2-9 Duplex Site Plan

SECTION 3 - INITIAL STUDY

3.1 - Environmental Checklist

1. Project Title:

Affordable Multi-Family Housing Project (TTM No. 22-0011)

2. Lead Agency Name and Address:

City of Chowchilla
130 South Second Street
Chowchilla, CA 93610

3. Contact Person and Phone Number:

Denise Munoz, Community & Economic Development Director
(559) 665-8615 ext. 400

4. Project Location:

The Project site and the Annexation Only Area are located in an unincorporated area of southwest Madera County, directly adjacent to the southwest limits of the City of Chowchilla (City). The Project consists of Assessor Parcel Numbers (APNs). The Project site is APN 026-233-008, and the Annexation Only Area are APNs 026-233-007, -009, and -010, totaling approximately 45 acres.

5. Project Sponsor's Name and Address:

Tommy Phelen
Cen Cal Builders & Developers, Inc.
3497 East International Avenue
Clovis, California 93619
(559) 225-0697

6. General Plan Designation:

Existing: County of Madera – High-Density Residential (HDR), Community Commercial (CC), and Medium-Density Residential (MDR)

Proposed: City of Chowchilla – High-Density Residential (HDR)

7. Zoning:

Existing: County of Madera – Residential, Rural, Single-Family District (RRS) and Commercial, Rural, Median District (CRM)

Proposed Pre-zoning: City of Chowchilla – High-Density Residential (R-H)

8. Description of Project:

Project site: This term refers to the approximately 18.24-acre parcel (APN 026-233-008) to be developed as part of TTM No. 22-0011. The Project site is currently an undeveloped field and is zoned Residential, Rural, Single-Family District (RRS) and Commercial, Rural Median District (CRM) within the County of Madera. The Project site is located in an unincorporated area of southwest Madera County, directly adjacent to the southwest limits of the City of Chowchilla and within the City's Planning Area and Sphere of Influence (SOI). The entire 18.24-acre parcel would be annexed into the City of Chowchilla and pre-zoned to High Density Residential (R-H), consistent with the City's High Density Residential (HDR) land use designation.

The Project site will consist of the following components:

- The northeastern portion of the parcel will be subdivided into 17 lots that are planned for the development of 17 three-bedroom/two-bathroom duplex homes (34 units) on 7.85 acres.
- The central and western portions of the parcel will be developed in two phases that will include a total of 18 two-story apartment complexes with a total of 154 apartment units on 10.39 acres.
- The apartments would be constructed as:
 - 100 percent below-market-rate affordable housing units.
 - 60 percent three-bedroom units.
 - 40 percent two-bedroom units.
 - One percent will be one-bedroom units.
- Adequate parking will be provided throughout the complex adjacent to apartment buildings.
- A clubhouse, management office, and pool will be developed near the western Project site boundary.
- The following Outlots along the eastern Project site boundary are designated as:
 - Outlot A is designated for a pond and park.
 - Outlot B is designated as an emergency/fire access road and a recreation trail.
 - Outlot C is designated as open space and recreation trail.
- On- and off-site improvements, including circulation roads, interior local streets, street lighting, curb, gutter, sidewalk, open space, and landscaping, are proposed as part of the Project. The Project site will construct an internal road that connects the existing Lincoln Avenue on the north Project boundary to the existing Road 15 on the west Project boundary. Primary access to the duplexes will be from Lincoln Avenue and internal circulation roads, and primary access to the apartments will be from Road 15. Sewer, water, and storm drain services would be provided by the City. Electricity will be provided by PG&E.

Annexation Only Area: This term refers to the three unincorporated parcels (APNs 026-233-007, 026-233-009, and 026-233-010) totaling 45 acres, to the southwest adjacent to

the Project site Area. APN 026-233-007 is currently an agricultural orchard, and APNs 026-233-009 and -010 are currently developed with rural residential homes. The Annexation Only Area will be annexed into the City and pre-zoned to High Density Residential (H-D), consistent with the City's Land Use Element Map. No development or changes in land use are proposed for the Annexation Only Area. Any future development or change in land use may require additional environmental review and analysis.

Buildout: The Project site will be constructed in two phases, as outlined below.

Phase 1 and Phase 2 – a total of 188 residential units: Construction is planned in two phases and is anticipated to begin in spring 2027. There is an existing metal warehouse building at the southwest corner of the property that will be demolished prior to the start of construction. Phase 1 consists of the 6.31-acre western portion of the multi-family development and is anticipated to be completed in spring 2029. Phase 2 would then begin in fall 2029 and would be completed in fall 2031. The duplexes will likely be constructed concurrently with the multi-family apartments development; therefore, between 2027 and 2031.

Discretionary Actions: The following discretionary entitlements are required for the proposed Project:

- General Plan Amendment
- Prezoning
- Annexation
- Tentative Tract Map No. 22-0011
- Development Permit No. 22-0011

It is anticipated that the following equipment would be used during construction activities:

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

9. Surrounding Land Uses and Setting:

The site is generally bound by Roberston Boulevard (State Route 233) to the northwest, the City of Chowchilla to the northeast, and Road 15 to the west. The surrounding land uses are single-family residential subdivision and agricultural land to the north, agricultural land and rural residential housing to the east, agricultural land to the south, and rural residential housing to the west.

10. Other Public Agencies Whose Approval is Required:

- Madera County Local Agency Formation Commission (LAFCo)
- San Joaquin Valley Air Pollution Control District (SJVAPCD)

11. Have California Native American tribes traditionally and culturally affiliated with the Project area requested consultation pursuant to Public Resources Code Section 21080.3.1? If so, has consultation begun?

On **January 28, 2026**, pursuant to Public Resources Code Section 21080.3.1 and Government Code Section 65300 *et seq*, Senate Bill 18, letters were sent to each of the Native American tribes within the geographic area as identified by the Native American Heritage Commission (NAHC) (see Appendix A) and closed on **April 28, 2026**. The letters included a Project description and location maps. No tribe requested consultation.

On **October 21, 2025**, pursuant to Assembly Bill 52, letters were sent to each of the Native American tribes within the geographic area as identified by the NAHC (see Appendix A) and closed the commenting period on **November 21, 2025**. The letters included a Project description and location maps.

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

3.2 - Environmental Factors Potentially Affected

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

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

3.3 - Determination

On the basis of this initial evaluation:

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

- ☐ I find that although the proposed Project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed Project, nothing further is required.

Denise Munoz

Signature

3/31/2026

Date

Denise Munoz
Community & Economic Development Director

3.4 - Evaluation of Environmental Impacts

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

previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
9. The explanation of each issue should identify:
 - a. The significance criteria or threshold, if any, used to evaluate each question; and
 - b. The mitigation measure identified, if any, to reduce the impact to less than significant.

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

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

- | | | | | | |
|----|--|--------------------------|-------------------------------------|-------------------------------------|-------------------------------------|
| a. | Have a substantial adverse effect on a scenic vista? | ☐ | ☐ | ☐ | ☒ |
| b. | Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway? | ☐ | ☒ | ☐ | ☐ |
| c. | In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the Project is in an urbanized area, would the Project conflict with applicable zoning and other regulations governing scenic quality? | ☐ | ☐ | ☒ | ☐ |
| d. | Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area? | ☐ | ☐ | ☒ | ☐ |

In this section, the analysis focuses on the impacts associated with the Project site and related improvements. For the purposes of this analysis, the Annexation Only Area has no new development or change in land use proposed, and this area is considered part of the baseline.

This section is substantiated, in part, with a Cultural Resources Assessment prepared for this Project, which is attached as Appendix A (Archaeological Resources Technology (ART), 2023).

Discussion

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

A scenic vista is defined as a viewpoint that provides expansive views of highly valued landscape for the benefit of the general public. According to the EIR for the City's General Plan, there are no scenic vistas in the City's Planning Area (City of Chowchilla, 2010). Further, there are no elevated landforms that will represent an opportunity for a scenic vista of the surrounding land. The distance of the community from the Sierra Nevada and the diminished

view of the mountains negate mountain views as being considered a scenic vista. Therefore, the Project would not have an impact on a scenic vista.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

There would be **no impact**.

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

There are no scenic highways in the City's Plan Area. The nearest listed State scenic highways are portions of State Route 152 near Santa Nella, approximately 40 miles west, and portions of State Route 41 near Oakhurst, approximately 40 miles east (Caltrans, 2026). There are no rock outcroppings or historically significant buildings on the Project site.

However, the palm trees lining Robertson Boulevard are a significant visual characteristic of the Planning Area (City of Chowchilla, 2010). According to the City of Chowchilla 2040 General Plan, the most identifiable landmark in the City is the palm tree-lined West Robertson Boulevard. The palm trees were planted at the direction of City Founder Orlando A. Robertson in 1913. West Robertson Boulevard is listed as a California Historical Landmark, and the City of Chowchilla, Madera County, and Caltrans consider the palm tree-lined Robertson Boulevard a historical resource. The results of the record search performed at the Southern San Joaquin Valley Information Center (SSJVIC) of the California Historical Resources Information Service (File No. 22-490) indicated that the Project is located adjacent to an existing row of palms (Primary No. 20-002519), a listed California Point of Historical Interest (Archaeological Resources Technology (ART), 2023). A number of trees that comprise P-20-002519 remain in their original location.

The Project site's primary access will be from Lincoln Avenue, internal roadways, and Road 15. The palm trees are not located on the Project site and will not be damaged as a result of this Project. However, in the event the trees cannot be avoided, MM AES-1 requires the developer to hire a professional arborist to relocate the impacted trees to a nearby location along Robertson Boulevard and to maintain the tree(s) for a minimum of 12 months to ensure viability. Therefore, the Project will not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway.

MITIGATION MEASURE(S)

MM AES-1: Prior to issuance of ground disturbance along Robertson Boulevard, the developer or contractor shall implement the following measures:

- a. Indicate on the plans which, if any, of the existing palm trees' construction will be impacted during construction activities. If construction cannot avoid the palm trees, the developer or contractor shall hire a qualified botanist, arborist, or other professional to relocate the impacted trees to a new location in close proximity. A copy of the contract with the qualified professional shall be submitted to the City as proof of compliance.
- b. The developer shall routinely care for and maintain the relocated tree(s) for at least one year after the relocation to ensure the plant's survival. A report shall be submitted to the City at the end of the 12-month period that illustrates the success of the relocation.

LEVEL OF SIGNIFICANCE

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

Impact #3.4.1c - Would the Project in non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the Project is in an urbanized area, would the Project conflict with applicable zoning and other regulations governing scenic quality?

The Project is within a mixed rural and residential area of Chowchilla. The Project site is currently an undeveloped field and is zoned RRS within the County of Madera. The Project site is located in an unincorporated area of southwest Madera County, directly adjacent to the southwest limits of the City of Chowchilla and within the City's Planning Area and SOI. The entire 18.24-acre parcel would be annexed into the City of Chowchilla and pre-zoned to R-H, consistent with the City's HDR land use designation. Pursuant to the Residential Land Use Table in City Code Section 18.08.020, multi-family dwelling (duplex and five or more units per building) is permitted in the R-H zoning district.

The surrounding land uses are single-family residential subdivision and agricultural land to the north, agricultural land and rural residential housing to the east, agricultural land to the south, and rural residential housing to the west. After buildout, the Project site would have similar visual features to those of the surrounding residential uses (i.e., internal roads, driveways, street lighting, roofs, and landscaping). Therefore, the Project would not substantially degrade the existing visual character and would not conflict with applicable zoning or other regulations governing scenic quality. As such, the Project would have a less-than-significant impact.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

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

As urban uses expand from the existing margins of the City, new sources of light and glare will be introduced into the rural area, especially at the margin of the urban area. This represents an encroachment into an area that has not been subjected to urban-level lighting intensity. Nighttime lighting is necessary to provide and maintain safe, secure, and attractive environments; however, these lights have the potential to produce spillover light and glare and waste energy, and if designed incorrectly, could be considered unattractive. Light that falls beyond the intended area is referred to as “light trespass.” Types of light trespass include spillover light and glare. Minimizing all these forms of obtrusive light is an important environmental consideration. A less obtrusive and well-designed energy-efficient fixture would face downward, emit the correct intensity of light for the use, and incorporate energy timers.

The Chowchilla Municipal Code, Section 18.50.150, subsections D and E (General Outdoor Lighting Standards and Residential Outdoor Lighting Standards), regulate lighting standards relevant to this Project. These regulations can decrease or eliminate the impacts related to new light sources. For example, standards require, but are not limited to:

- **18.50.150(D)(1)** – All lights and light fixtures, except public streetlights, shall be located, aimed, or shielded so as to minimize light trespassing across property boundaries or skyward.
- **18.50.150(D)(2)** – No lights or light fixtures shall flash, revolve, blink, or otherwise resemble a traffic control signal or operate in such a fashion to create a hazard for passing traffic.
- **18.50.150(E)(2)** – Freestanding light fixtures, including freestanding parking lot light fixtures, shall not exceed eighteen feet in height measured from the top of a light fixture to the adjacent grade at the base of the support for that light fixture.

All lighting used will be approved according to the City of Chowchilla Building Department’s requirements, which include requirements and/or restrictions intended to prevent light and glare impacts. General Plan Policy N 4.6 requires that the City limit construction activities to the hours of 7:00 am to 7:00 pm, Monday through Saturday. No construction shall occur on Sundays or national holidays without a permit from the City. While some construction activities may occur during dusk, construction activities would be temporary in nature and would cease upon Project completion. Compliance with City lighting regulations would ensure that the Project would not create a new source of substantial light or glare that would affect day or nighttime views in the Project area. Therefore, the Project would have a less-than-significant impact.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

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

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

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

In this section, the analysis focuses on the impacts associated with the Project site and related improvements. For the purposes of this analysis, the Annexation Only Area has no new development or change in land use proposed, and this area is considered part of the baseline.

Discussion

Impact #3.4.2a – Would the Project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the

Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

The California Department of Conservation (DOC) established the Farmland Mapping and Monitoring Program (FMMP) in 1982. The FMMP is a non-regulatory program and provides a consistent and impartial analysis of agricultural land use and land use changes throughout California. The FMMP produces maps and statistical data used to analyze the impacts on California's agricultural resources. Agricultural land is rated according to soil quality and irrigation status.

CEQA uses the California DOC FMMP categories of Prime Farmland, Farmland of Statewide Importance, and Unique Farmland to define agricultural land for the purposes of assessing environmental impacts (PRC Section 21060.1(a)).

The Project site was historically used for agriculture, but there is no active agricultural cultivation. A majority of the Project site is designated as Farmland of Local Importance, while a smaller portion is designated as Rural Residential Land and Urban and Built-Up Land (California Department of Conservation, 2026a). Farmland of Local Importance is non-irrigated property that is either currently producing crops or has the capacity to be cultivated for row/field crop use (City of Chowchilla, 2014). The site is not classified as Important Farmland under CEQA, and therefore, impacts would be less than significant.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

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

According to the California Department of Conservation, the Project site is not under a Williamson Act contract (California Department of Conservation, 2026b). As discussed in Impact #3.4.2a, the Project site is designated as HDR by the City's 2040 General Plan. Once the Project site is annexed, it will be rezoned as R-H. Therefore, implementation of the Project would not conflict with any existing zone for agriculture or with an existing Williamson Act contract, and therefore would have no impact.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

There would be *no impact*.

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

As discussed in Impact #3.4.2a and b above, the Project site is designated as HDR by the City's 2040 General Plan and will be rezoned as R-H. The Project site is not designated as forest land (as defined in Public Resources Code Section 12220[g]), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104[g]). Therefore, implementation of the Project would not conflict with any existing zoning for forest land, timberland, or timberland zoned Timberland Production and would have no impact.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

There would be *no impact*.

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

As discussed in Impact #3.4.2c above, the Project site would not result in the loss of forest land. There would be no impact.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

There would be *no impact*.

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

Agricultural uses account for approximately 6,517 acres in the Chowchilla Planning Area (City of Chowchilla, 2010). It is estimated that of the 10,109 acres within the Planning Area, seven percent is currently used for residential, commercial, and industrial purposes in the unincorporated area of the County. The agricultural land in the Planning Area includes grazing land, row crops, field crops, orchards, vineyards, and dairies.

The Project site has a planned land use designation of High-Density Residential under the Chowchilla General Plan; therefore, residential growth on the Project site is planned.

The Project would not be detrimental to the long-term agricultural use of neighboring properties. The City's General Plan determined that within this planning period, approximately 5,926 acres of agricultural Farmland of Statewide Importance and Prime Farmland could be converted to urban built-up land. The Project site is located within the City limits and is contiguous to existing built-up development; therefore, the Project could easily be served by an extension of existing City infrastructure. The proposed Project site development would not be considered an increase beyond what has already been analyzed, and therefore, would have a less-than-significant impact.

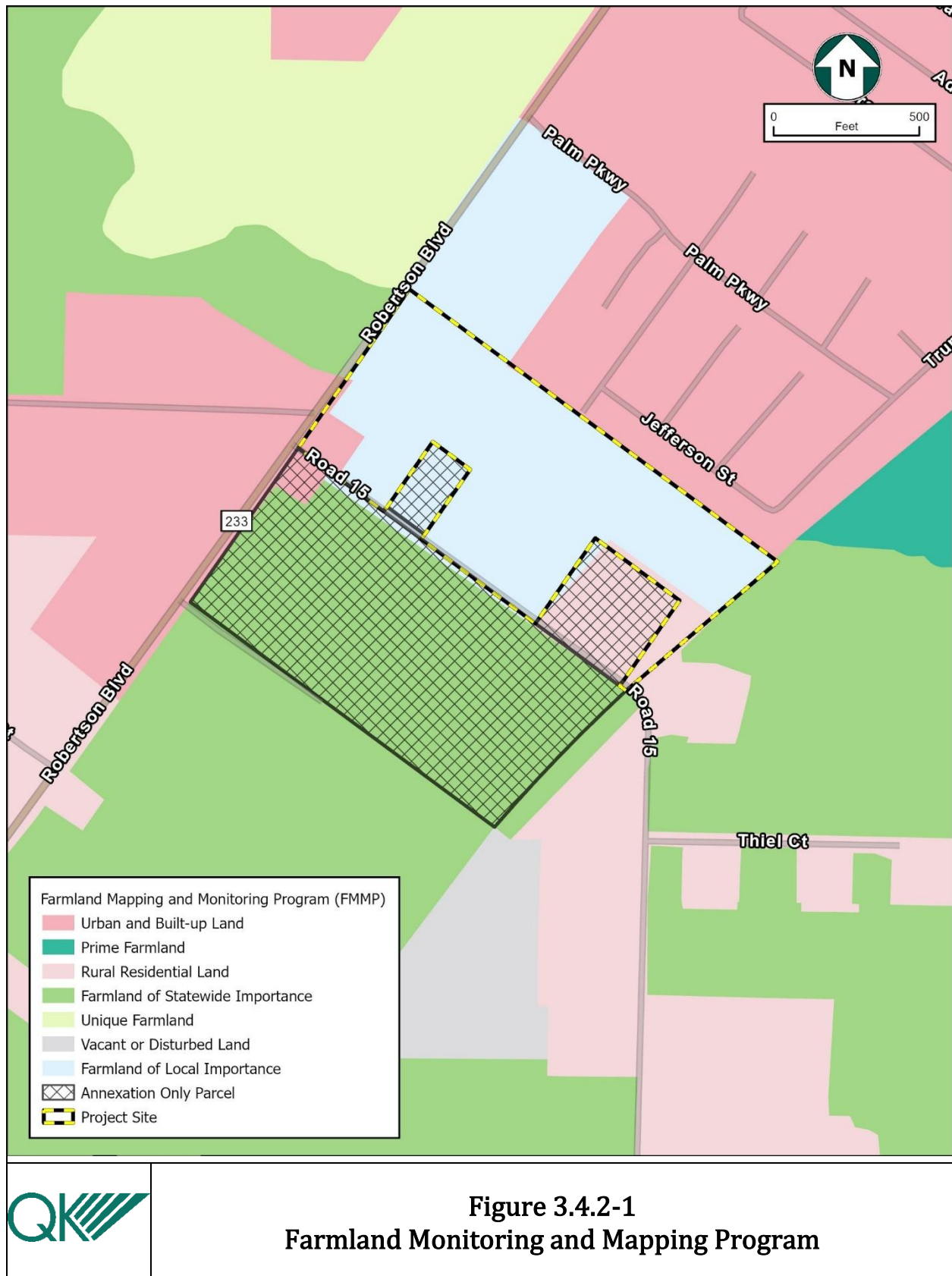
Although the Project site is partially designated as Farmland of Local Importance by the Department of Conservation, the Project site is not in active agriculture, and the City's 2040 General Plan designated the Project site as High-Density Residential. Therefore, the Project would have a less-than-significant impact.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.



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

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

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

In this section, the analysis focuses on the impacts associated with the Project site and related improvements. For the purposes of this analysis, the Annexation Only Area has no new development or change in land use proposed, and this area is considered part of the baseline.

The analysis presented is based on an Air Quality Impact Assessment (AQIA) and Greenhouse Gases (GHG) Analysis (LSA, 2026) and a Vehicles Miles Traveled (VMT) Analysis (LSA, 2025a), prepared for this Project, attached as Appendix B and Appendix F, respectively.

Discussion

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

Plan Consistency

The United States Environmental Protection Agency (USEPA) and California Air Resources Board (CARB) regulate direct emissions from motor vehicles. The SJVAPCD is the regional agency primarily responsible for regulating air pollution emissions from stationary sources (e.g., factories) and indirect sources (e.g., traffic associated with new development), as well as monitoring ambient pollutant concentrations.

The Project is located within Madera County in the San Joaquin Valley Air Basin (SJVAB or Basin). The AQIA prepared for this Project was developed using methods and assumptions recommended in the SJVAPCD's *Guidance for Assessing and Mitigating Air Quality Impacts* (GAMAQI) and the CEQA Statute and Guidelines. An air quality plan describes air pollution control strategies to be implemented by a city, county, or region classified as a nonattainment area. The main purpose of the air quality plan is to bring the area into compliance with the requirements of the federal and State air quality standards. To bring the San Joaquin Valley into attainment, the SJVAPCD adopted the *2022 Plan for the 2015 8-hour Ozone Standard in December 2022* to satisfy Clean Air Act (CAA) requirements and ensure attainment of the 70 parts per billion (ppb) 8-hour ozone standard. To assure the SJVAB's continued attainment of the USEPA PM₁₀ standard, the SJVAPCD adopted the *2007 PM₁₀ Maintenance Plan* in September 2007.² The SJVAPCD adopted the *2024 Plan for the 2012 PM_{2.5} Standard* to address the USEPA federal annual PM_{2.5} standard of 12 micrograms per cubic meter (µg/m³) by 2030.

The SJVAPCD defines emissions thresholds in the GAMAQI, established based on the attainment status of the air basin with regard to air quality standards for specific criteria pollutants. Because the concentration standards were set at a level that protects public health with an adequate margin of safety, these emission thresholds are regarded as conservative and would overstate an individual project's contribution to health risks.

For a project to be consistent with SJVAPCD air quality plans, the pollutants emitted from a project should not exceed the SJVAPCD emission thresholds or cause a significant impact on air quality. As discussed below, construction of the proposed Project would not result in the generation of criteria air pollutants that would exceed the SJVAPCD thresholds of significance. In developing thresholds of significance for air pollutants, the SJVAPCD considered the emission levels for which a project's individual emissions would be cumulatively considerable. If a project exceeds the identified significance thresholds, its emissions would be cumulatively considerable, resulting in significant adverse air quality impacts to the region's existing air quality conditions. The following analysis assesses the potential construction- and operation-related air quality impacts. SJVAPCD's construction and operation emission thresholds of significance (tons per year) are shown in Table 3.4.3-1 below.

Table 3.4.3-1
SJVAPCD Construction and Operation Thresholds of Significance
(Tons per Year)

	CO	NO _x	ROG	SO _x	PM ₁₀	PM _{2.5}
Construction Thresholds	100	10	10	27	15	15
Operation Thresholds	100	10	10	27	15	15

Source: (LSA, 2026)

Notes: CO = carbon dioxide, NO_x = nitrogen oxides, PM_{2.5} = particulate matter less than 2.5 microns in size, PM₁₀ = particulate matter less than 10 microns in size, ROG = reactive organic compounds, SO_x = sulfur oxides

Construction

During construction, short-term degradation of air quality may occur due to the release of particulate matter emissions (i.e., fugitive dust) generated by demolition, grading, hauling, and other activities.

Table 3.4.3-2 below presents the Project's short-term emissions based on the anticipated construction period. As calculated with CalEEMod, the estimated short-term construction-related emissions would not exceed the SJVAPCD significance threshold levels in any given year and would therefore be less than significant.

Table 3.4.3-2
Project Construction Emissions (Tons per Year)

Project Construction	ROG	NO_x	CO	SO_x	PM₁₀	PM_{2.5}
2026	0.1	1.6	1.3	<0.1	0.2	0.1
2027	0.1	2.6	2.3	<0.1	0.2	0.1
2028	0.7	0.1	0.1	<0.1	<0.1	<0.1
Maximum Annual Emissions	0.7	2.6	2.3	<0.1	0.2	0.1
SJVAPCD Thresholds	10.0	10.0	100.0	27.0	15.0	15.0
Exceeds?	No	No	No	No	No	No

Source: (LSA, 2026)

Notes: CO = carbon dioxide, NO_x = nitrogen oxides, PM_{2.5} = particulate matter less than 2.5 microns in size, PM₁₀ = particulate matter less than 10 microns in size, ROG = reactive organic compounds, SO_x = sulfur oxides

Site preparation and Project construction would include the following tasks: demolition, site preparation, grading, building construction, paving, and architectural coatings. Construction-related effects on air quality from the proposed Project would be greatest during the site preparation phase due to the disturbance of soils. If not properly controlled, these activities would temporarily generate particulate emissions. Sources of fugitive dust would include disturbed soils at the construction site.

Consistent with SJVAPCD Regulation VIII (Fugitive PM₁₀ Prohibitions), the following controls are required to be included as specifications for the proposed Project and implemented at the construction site to reduce and minimize fugitive dust emissions:

- All disturbed areas, including storage piles, which are not being actively utilized for construction purposes, shall be effectively stabilized of dust emissions using water and a chemical stabilizer/suppressant, then covered with a tarp or other suitable cover or vegetative ground cover.
- All on-site unpaved roads and off-site unpaved access roads shall be effectively stabilized of dust emissions using water or chemical stabilizer/suppressant.
- All land clearing, grubbing, scraping, excavation, land leveling, grading, cut and fill, and demolition activities shall be effectively controlled of fugitive dust emissions utilizing the application of water or by presoaking.

- When materials are transported off-site, all material shall be covered, or effectively wetted to limit visible dust emissions, and at least six inches of freeboard space from the top of the container shall be maintained.
- All operations shall limit or expeditiously remove the accumulation of mud or dirt from adjacent public streets at the end of each workday. (The use of dry rotary brushes is expressly prohibited except where preceded or accompanied by sufficient wetting to limit the visible dust emissions. Use of blower devices is expressly forbidden.)
- Following the addition of materials to, or the removal of materials from, the surface of outdoor storage piles, said piles shall be effectively stabilized of fugitive dust emissions utilizing sufficient water or chemical stabilizer/suppressant.

Water or other soil stabilizers can be used to control dust, resulting in emission reductions of 50 percent or more. The SJVAPCD has established Regulation VIII measures for reducing fugitive dust emissions (PM₁₀). With the implementation of Regulation VIII measures, fugitive dust emissions from construction activities would not result in adverse air quality impacts.

Operational (post-construction)

Long-term air pollutant emission impacts are those associated with mobile sources (e.g., vehicle trips), energy sources (e.g., natural gas), and area sources (e.g., architectural coatings and the use of landscape maintenance equipment) related to the proposed Project. Energy-source emissions result from activities in buildings that use natural gas. The quantity of emissions is the product of usage intensity (i.e., the amount of natural gas) and the fuel source's emission factor. However, as mentioned previously, the proposed Project would be designed to be all-electric and would not utilize natural gas. Typically, area-source emissions consist of direct air emissions located at the Project site, including architectural coatings and landscape maintenance equipment. Area-source emissions associated with the Project would include those from landscaping equipment use.

As calculated with CalEEMod, and demonstrated in Table 3.4.3-3 below, the estimated long-term operations-related emissions would not exceed SJVAPCD significance threshold levels during any given year and would, therefore, be less than significant.

**Table 3.4.3-3
Project Operations Emissions (Tons per Year)**

Project Construction	ROG	NO_x	CO	SO_x	PM₁₀	PM_{2.5}
Mobile Source Emissions	1.0	1.0	6.1	<0.1	1.4	0.4
Area Source Emissions	1.3	<0.1	2.8	<0.1	0.3	0.2
Energy Source Emissions	0.0	0.0	0.0	0.0	0.0	0.0
Total Project Operation Emissions	2.3	1.1	8.9	<0.1	1.7	0.6
SJVAPCD Thresholds	10.0	10.0	100.0	27.0	15.0	15.0
Exceeds Threshold?	No	No	No	No	No	No

Source: (LSA, 2026)

Notes: CO = carbon dioxide, NO_x = nitrogen oxides, PM_{2.5} = particulate matter less than 2.5 microns in size, PM₁₀ = particulate matter less than 10 microns in size, ROG = reactive organic compounds, SO_x = sulfur oxides

To summarize, CEQA Guidelines and the Federal Clean Air Act (Sections 176 and 316) contain specific references on the need to evaluate consistency between a proposed Project and the applicable Air Quality Attainment Plans (AQAP) for the Project site. To accomplish this, CARB has developed a three-step approach to determine project conformity with the applicable AQAP that has been analyzed above:

- Determination that an AQAP is being implemented in the area where the project is being proposed. SJVAPCD has implemented the current, modified AQAP as approved by CARB. Project-based emissions are below SJVAPCD's threshold of significance.
- The proposed project must be consistent with the growth assumptions of the applicable AQAP. The proposed Project is consistent with the City's HDR land use designation and is therefore included in the employment increases projected in the City of Chowchilla General Plan.
- The project must contain in its design all reasonably available and feasible air quality control measures. The proposed Project incorporates various policy and rule-required implementation measures that will reduce related emissions.

Therefore, the Project is consistent with the applicable air quality plan, and as such, impacts would be less than significant.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

Impact #3.4.3b – Would the Project result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is nonattainment under an applicable federal or State ambient air quality standard?

Both the State of California (State) and the federal government have established health-based ambient air quality standards (AAQS) for six criteria air pollutants: carbon monoxide (CO), ozone, nitrogen dioxide (NO₂), sulfur dioxide (SO₂), lead, particulate matter less than 2.5 microns in size (PM_{2.5}), and particulate matter less than 10 microns in size (PM₁₀). The SJVAB is designated as nonattainment for ozone and PM_{2.5} for federal standards and nonattainment for ozone, PM₁₀, and PM_{2.5} for State standards.

Air quality monitoring stations are located throughout the nation and maintained by the local air districts and State air quality regulating agencies. Data collected at permanent monitoring stations are used by the USEPA to identify regions as “attainment” or “nonattainment” depending on whether the regions meet the requirements stated in the applicable National Ambient Air Quality Standards (NAAQS). Nonattainment areas are imposed with additional restrictions as required by the USEPA. In addition, different classifications of attainment, such as marginal, moderate, serious, severe, and extreme, are used to classify each air basin in the State on a pollutant-by-pollutant basis. The classifications are used as a foundation to create air quality management strategies to improve air quality and comply with the NAAQS. The SJVAB attainment statuses for each of the criteria pollutants for Madera County are illustrated in Table 3.4.3-4 below.

**Table 3.4.3-4
San Joaquin Valley Air Basin Attainment Status**

Pollutant	Federal Standards	State Standards
Ozone-One hour	Revoked	Nonattainment/Severe
Ozone - Eight-hour	Extreme Nonattainment	Nonattainment
PM ₁₀	Attainment (Maintenance)	Nonattainment
PM _{2.5}	Nonattainment	Nonattainment
Carbon Monoxide	Attainment (Maintenance)	Attainment/Unclassified
Nitrogen Dioxide	Attainment/Unclassified	Attainment
Lead	Attainment/Unclassified	Attainment
Sulfur Dioxide	Attainment/Unclassified	Attainment
Sulfates	No Federal Regulation	Attainment
Hydrogen Sulfide	No Federal Regulation	Unclassified

Source: (LSA, 2026)

In developing thresholds of significance for air pollutants, the SJVAPCD considered the emission levels for which a project’s individual emissions would be cumulatively considerable. If a project exceeds the identified significance thresholds, its emissions would be cumulatively considerable, resulting in significant adverse air quality impacts to the region’s existing air quality conditions.

Construction

Emissions from construction would include CO, NO_x, ROG, directly emitted particulate matter (PM_{2.5} and PM₁₀), and Toxic Air Contaminants (TACs) such as diesel exhaust particulate matter. In addition to dust-related PM₁₀ emissions, heavy trucks and construction

equipment powered by gasoline and diesel engines would generate CO, SO₂, NO_x, ROG, and some soot particulate (PM_{2.5} and PM₁₀) in exhaust emissions. If construction activities were to increase traffic congestion in the area, CO and other emissions from traffic would increase slightly while those vehicles are delayed. These emissions would be temporary and limited to the immediate area surrounding the construction site. As discussed in Impact #3.4.3a and Table 3.4.3-2 above, construction emissions for the proposed Project do not exceed SJAPCD's threshold for criteria air pollutants.

Operation

Mobile-source emissions include ROG and NO_x emissions that contribute to the formation of ozone. Additionally, PM₁₀ emissions result from running exhaust, tire and brake wear, and the entrainment of dust into the atmosphere from vehicles traveling on paved roadways. The primary emissions associated with the Project are regional in nature, meaning that air pollutants are rapidly dispersed on release or, in the case of vehicle emissions associated with the Project, emissions are released in other areas of the SJVAB. The annual criteria air pollutant emissions associated with Project operational trip generation, energy, and area sources are identified in Table 3.4.3-3 for ROG, NO_x, CO, SO_x, PM₁₀, and PM_{2.5}.

Results of the analysis in Impact #3.4.3a, Table 3.4.3-2 and Table 3.4.3-3 above, shows that emissions generated from construction and operation of the Project would be less than the applicable SJVAPCD emission thresholds for criteria pollutants which would not result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is in nonattainment under an applicable federal or State AAQS. Therefore, impacts would be less than significant.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

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

Sensitive receptors are defined as people who have an increased sensitivity to air pollution or environmental contaminants. Sensitive receptor locations include schools, parks and playgrounds, day care centers, nursing homes, hospitals, and residential dwelling units. The closest sensitive receptors to the Project site include the single-family residential uses located immediately north of the Project site along Jefferson Street and Lincoln Avenue, to the east and south along Road 15, and to the west across Robertson Boulevard.

Health Risk Assessment (HRA)**CONSTRUCTION**

A construction HRA, which evaluates construction-period health risk to off-site receptors, was performed for the proposed Project. Table 3.4.3-5, below, identifies the results of the analysis. Table 3.4.3-5, below, identifies the results of the analysis, assuming the use of Tier 2 construction equipment as proposed by the Project.

**Table 3.4.3-5
Unmitigated Health Risks from Project Construction to Off-Site Receptors**

Risk Location	Carcinogenic Inhalation Health Risk in One Million	Chronic Inhalation Hazard Index	Acute Inhalation Hazard Index
Residential Receptor	45.06	0.040	0.000
Worker Receptor	0.60	0.029	0.000
School Receptor	0.04	0.000	0.000
SJVAPCD Significance Threshold	20.0 in one million	1.0	1.0
Significant?	Yes	No	No

Source: (LSA, 2026)

As shown in Table 3.4.3-5, the maximum cancer risk for the residential receptor Maximally Exposed Off-site Individual (MEI) would be 45.06 in one million, which would exceed the SJVAPCD cancer risk threshold of 20 in one million. The worker and school receptor risk would be lower at 0.60 in one million and 0.04 in one million, respectively, which would not exceed the SJVAPCD cancer risk thresholds. The chronic HI would be 0.040 for the residential receptor MEI, 0.029 for the worker receptor MEI, and 0.000 for the school receptor MEI, which would be below the threshold of 1.0. In addition, the acute Hazard Index (HI) would be nominal (0.000), which would also not exceed the threshold of 1.0. Therefore, implementation of Mitigation Measure (MM) AIR-1, which would require the use of cleaner construction equipment, would be necessary to reduce substantial pollutant concentrations during Project construction.

Table 3.4.3-6 identifies the results of the analysis with implementation of MM AIR-1.

**Table 3.4.3-6
Mitigated Health Risks from Project Construction to Off-Site Receptors**

Risk Location	Carcinogenic Inhalation Health Risk in One Million	Chronic Inhalation Hazard Index	Acute Inhalation Hazard Index
Residential Receptor	7.24	0.007	0.000
Worker Receptor	0.03	0.005	0.000
School Receptor	0.01	0.000	0.000
SJVAPCD Significance Threshold	20.0 in one million	1.0	1.0
Significant?	No	No	No

Source: (LSA, 2026)

As shown in Table 3.4.3-6, the mitigated cancer risk at the MEI would be 7.24 in one million, which would not exceed the SJVAPCD's cancer risk of 20 in one million. Therefore, with the implementation of MM AIR-1, the construction of the proposed Project would not exceed SJVAPCD thresholds and would not expose nearby sensitive receptors to substantial pollutant concentrations.

OPERATION (POST-CONSTRUCTION)

CAAQS and NAAQS were developed to protect the most susceptible population groups from adverse health effects and were established in terms of ppm or µg/m³ for the applicable emissions. As demonstrated in Table 3.4.3-3 of Impact #3.4.3a above, the proposed Project's operational emissions would not exceed the SJVAPCD's significance criteria for annual ROG, NO_x, CO, SO_x, PM₁₀, or PM_{2.5} emissions. The SJVAPCD recommends an ambient air quality analysis (AAQA) using air dispersion modeling to determine if the emissions increase from a project will cause or contribute to a violation of NAAQS or CAAQS for a project if emissions exceed 100 pounds per day of any pollutant. As shown in Table 3.4.3-3 of Impact #3.4.3a above, the proposed Project would generate approximately 2.3 tons per year of ROG, 1.1 tons per year of NO_x, 8.9 tons per year of CO, less than 0.1 tons per year of SO_x, 1.7 tons per year of PM₁₀, and 0.6 tons per year of PM_{2.5} emissions. Based on CalEEMod, the maximum pounds per day generated by the proposed Project would be approximately 17.0 pounds per day of ROG, 6.7 pounds per day of NO_x, 92.7 pounds per day of CO, 0.2 pounds per day of SO_x, 14.3 pounds per day of PM₁₀, and 8.1 pounds per day of PM_{2.5}. As such, the proposed Project's operational emissions would not exceed 100 pounds per day for any pollutant. Therefore, an AAQA evaluation would not be required.

As such, Project emissions would not be expected to exceed NAAQS or CAAQS. It should be noted that the AAQS are developed and represent levels at which the most susceptible persons (children and the elderly) are protected. In other words, the AAQS are purposefully

set low to protect children, the elderly, and those with existing respiratory problems. Furthermore, air quality trends for emissions of NO_x, volatile organic compounds (VOCs), ozone (which is a byproduct of NO_x and VOCs), and PM emissions have been trending downward within the SJVAPCD even as development has increased over the last several years. Therefore, continued implementation of the proposed Project is not expected to result in any SJVAPCD-wide increase in health effects. Therefore, sensitive receptors are not expected to be exposed to substantial pollutant concentrations during Project construction or operation.

MITIGATION MEASURE(S)

MM AIR-1: During construction of the proposed Project, the Project contractor shall ensure all off-road, diesel-powered construction equipment of 50 horsepower or more used for the Project construction meets, at a minimum, the California Air Resources Board Tier 2 emissions standards equipped with Level 3 diesel particulate filters or the equivalent.

LEVEL OF SIGNIFICANCE

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

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

The SJVAPCD addresses odor criteria within the GAMAQI. The SJVAPCD has not established a rule or standard regarding odor emissions; rather, the SJVAPCD has a nuisance rule:

“Any project with the potential to frequently expose members of the public to objectionable odors should be deemed to have a significant impact.”

Furthermore, the SJVAPCD’s GAMAQI requires that an analysis of potential odor impacts be conducted for the following two situations:

- Generators – projects that would potentially generate odorous emissions proposed to be located near existing sensitive receptors or other land uses where people may congregate.
- Receivers – residential or other sensitive receptor projects or other projects built for the intent of attracting people located near existing odor sources.

The Project will not generate odorous emissions given the nature or characteristics of residential developments. The intensity of an odor source’s operations and its proximity to sensitive receptors influence the potential significance of odor emissions. The SJVAPCD has identified some common types of facilities that have been known to produce odors in the SJVAB. The types of facilities that are known to produce odors are shown in Table 3.4.3-7 of the AQIA, along with a reasonable distance from the source within which the degree of odors could possibly be significant.

**Table 3.4.3-7
Screening Levels for Potential Odor Sources**

Type of Facility	Distance
Wastewater Treatment Facilities	2 miles
Sanitary Landfill	1 mile
Transfer Station	1 mile
Composting Facility	1 mile
Petroleum Refinery	2 miles
Asphalt Batch Plant	1 mile
Chemical Manufacturing	1 mile
Fiberglass Manufacturing	1 mile
Painting/Coating Operations	1 mile
Food Processing Facility	1 mile
Feed Lot/Dairy	1 mile
Rendering Plant	1 mile

Source: (SJVAPCD, 2015)

Of the facility types listed in Table 3.4.3-7 above, one facility type (wastewater treatment facility) is located within two miles of the Project site. The City of Chowchilla's wastewater treatment facility is located at 15750 Avenue 24 1/2, approximately 0.50 miles east of the Project site.

Offensive odors rarely cause any physical harm, and no requirements for their control are included in State or federal air quality regulations. The SJVAPCD has no rules or standards related to odor emissions, other than its nuisance rule.

The City has received complaints related to odor from the wastewater treatment facility. Complaints generally only occur at times of dense fog. The plant has been inspected by SJVAPCD, and issues were noted due to old equipment. However, the City is currently working with the Air Board, and the following upgrades are being installed to help alleviate or reduce odor issues.

- Aeration Project to improve water movement within the ponds, to introduce oxygen, promote aerobic bacterial digestion of sludge, reduce muck buildup, and eliminate odors.
- Add re-sludge activation pumps that will move settled microorganisms (activated sludge) from the bottom of a clarifier back into the aeration basin. This continuous recirculation maintains high bacteria concentrations, enabling rapid biological digestion of incoming waste, ensuring efficient nutrient removal, and maintaining plant efficiency.
- Bar screen improvements will more efficiently remove large solids like rags, plastics, and sticks from sewage to protect downstream equipment.

Given this, the proposed Project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people from generators or receivers of odors. Therefore, there is a less-than-significant impact.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than- Significant Impact	No Impact
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3.4.4 - BIOLOGICAL RESOURCES

Would the Project:

a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
c. Have a substantial adverse effect on State or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species, or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☐	☒
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☒	☐	☐
f. Conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or State habitat conservation plan?	☐	☐	☐	☒

In this section, the analysis focuses on the impacts associated with the Project site and related improvements. For the purposes of this analysis, the Annexation Only Area has no new development or change in land use proposed, and this area is considered part of the baseline. The Annexation property was not surveyed for biological resources, as it is an orchard and would have no suitable habitat to support a special-status wildlife or plant species.

This section is substantiated by a Biological Evaluation prepared for this Project, which is attached as Appendix C (Live Oak Associates, Inc., 2023).

Discussion

Impact #3.4.4a – Would the Project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

The Biological Evaluation prepared for this Project assessed potential Project-related impacts (Live Oak Associates, Inc., 2023). The analysis of impacts was based on the known and potential biotic resources of the Project site. Sources of information used in the preparation of the evaluation included:

- The California Natural Diversity Database (CNDDB)
- The Inventory of Rare and Endangered Vascular Plants of California
- Manuals, reports, and references related to plants and animals of the Sierra Nevada foothills region
- Other available planning documents and biological studies from the general project vicinity.

A field survey of the Project site was conducted on June 13, 2023, by a qualified biologist. The survey entailed a systematic walk across the Project site to ensure full visual coverage of the site, while noting principal land uses and associated plant and animal species and mapping habitat suitable for special-status species and other sensitive or protected biological resources.

Biotic Habitats

The Project site contains a single biotic habitat/land use characterized as an agricultural field. At the time of the site survey, the site consisted of a post-harvest wheat field and ruderal field edges. Aside from the wheat stubble, vegetation consisted of a mix of common native and non-native herbaceous vegetation. Species observed comprised short-podded mustard (*Hirschfeldia incana*), prickly lettuce (*Lactuca serriola*), fiddleneck (*Amsinckia sp.*), field bindweed (*Convolvulus arvensis*), doveweed (*Croton setiger*), jimsonweed (*Datura wrightii*), ripgut brome (*Bromus diandrus*), and wild oats (*Avena sp.*), among others. Wetland species observed in places consisted of toad rush (*Juncus bufonius*) and hyssop loosestrife (*Lythrum hyssopifolia*). Several small trees occurred along the field margins consisting of almond (*Prunus dulcis*) and chinaberry (*Melia azedarach*).

The Project site's agricultural field is of moderate foraging habitat value for some native wildlife species that have adapted to make use of certain agricultural lands of the region. However, the suitability of the site for most native wildlife species is greatly limited by its long history of agricultural use, lack of aquatic habitat, and proximity to urban development.

Amphibians are expected to be absent from the Project site due to the absence of aquatic habitat on or near the site.

The Project site provides limited nesting habitat for avian species due to the general absence of trees and shrubs. However, the few trees at the field margins could conceivably be used for nesting by some species, and certain ground-nesting species may utilize the field and its margins. Foraging habitat for a number of avian species occurs on the site. Birds expected to utilize the site include mourning doves (*Zenaida macroura*), savannah sparrows (*Passerculus sandwichensis*), American pipits (*Anthus rubescens*), western kingbirds (*Tyrannus verticalis*) (observed), killdeer (*Charadrius vociferus*) (observed), barn swallows (*Hirundo rustica*) (observed), and Brewer's blackbirds (*Euphagus cyanocephalus*). Birds of prey potentially foraging on the site include American kestrels (*Falco sparverius*), red-tailed hawks (*Buteo jamaicensis*), and Swainson's hawks (*Buteo swainsoni*).

A few small mammal species would occur within the disked field. These may include California ground squirrels (*Otospermophilus beecheyi*) (observed), deer mice (*Peromyscus maniculatus*), Botta's pocket gophers (*Thomomys bottae*) (burrows observed), and Audubon cottontail rabbits (*Sylvilagus audubonii*). Ground squirrel burrows were limited to the southeastern end of the site. Mammalian predators such as striped skunk (*Mephitis mephitis*) and coyotes (*Canis latrans*) may pass through or forage on the site from time to time. Various species of bat may also forage over the site for flying insects.

Special-Status Plants and Wildlife Species

The CNDDDB was queried for special-status plant and animal occurrences in the nine USGS 7.5-minute quadrangles containing and surrounding the Project site: *Chowchilla, Berenda, Bonita Ranch, Firebaugh NE, Plainsburg, Le Grand, Poso Farm, Bliss Ranch, and El Nido*.

There are no special-status wildlife species listed as potentially occurring in the Project vicinity, and no designated as a Sensitive Natural Community by the California Department of Fish and Wildlife (CDFW), nor are any other sensitive habitats present on the site.

Sixteen special-status plant species have been documented in the Project vicinity; however, decades of farming on the site have resulted in unsuitable habitat conditions for all 16 of these plant species. Because these species have no appreciable potential to occur on the site, no Project-related impacts are anticipated. Therefore, impacts to special-status plants are considered less than significant.

Of the 18 special status animal species that potentially occur in the general vicinity of the site, 15 are considered absent from or unlikely to occur within the Project site due to the absence of suitable habitat and/or the Project site's being situated outside of the species' known distribution. These include the conservancy fairy shrimp, vernal pool fairy shrimp, vernal pool tadpole shrimp, valley elderberry longhorn beetle, California tiger salamander, blunt-nosed leopard lizard, western pond turtle, giant garter snake, bald eagle, Fresno kangaroo rat, San Joaquin kit fox, western spadefoot, coast horned lizard, burrowing owl,

and American badger. The Project is expected to have an insignificant effect or no effect on these species through construction mortality/disturbance or loss of habitat because there is little or no likelihood that they are present. The three special-status animal species that have the potential to occur are the Swainson's hawk, tricolored blackbird, and northern harrier. These species are discussed in more detail below.

SWAINSON'S HAWK

Swainson's hawks, a State-listed bird species, are known to nest within the vicinity of the Project site, primarily along water courses. In previous survey work, qualified biologists have identified active Swainson's hawk nests between 1.2 and 1.5 miles west of the site near Ash Slough, and the CNDDDB lists nesting occurrences of this species approximately 2.0 miles east and west of the site along Ash and Berenda Sloughs. However, suitable nest trees are absent from the Project site itself but do occur on surrounding lands. The agricultural field occupying the site provides a suitable foraging habitat for Swainson's hawks. The loss of these 18 acres of potential foraging habitat is not considered a significant loss of foraging habitat due to the abundance of similar or higher value foraging habitat available in the vicinity (Live Oak Associates, Inc., 2023).

Should Project construction occur during the nesting season (March 1 and September 15), Project construction could impact the nesting success of Swainson's hawks if they are nesting nearby. MM BIO-1 through BIO-3 would reduce impacts to nesting Swainson's hawks to a less-than-significant level. MM BIO-1 advises construction timing to occur outside of nesting season, if feasible, to reduce impacts to the Swainson's hawk. MM BIO-2 requires preconstruction surveys and specific parameters for those surveys if construction must occur during nesting season. MM BIO-3 requires disturbance-free buffers if Swainson's hawk nests are discovered during preconstruction surveys.

TRICOLORED BLACKBIRD

In California, protection is afforded to the nests and eggs of all birds. California Fish and Game Code (Section 3503) states that it is "unlawful to take, possess, or needlessly destroy the nest or eggs of any bird except as otherwise provided by this code or any regulation adopted pursuant thereto." Breeding-season disturbance that causes nest abandonment and/or loss of reproductive effort is considered a form of "take" by the CDFW.

The Project site has the potential to be used for nesting by a variety of birds protected by State and federal law, including the tricolored blackbird, a State-listed bird species that could conceivably nest on the site when planted to wheat. A few other bird species could nest in the trees along the Project boundary or on the ground. If Project construction takes place during the nesting season, birds nesting on the site could be injured or killed by construction activities or disturbed such that they would abandon their nests. Significant construction-related disturbance is also a possibility for birds nesting adjacent to the Project site. Construction-related mortality of nesting birds and disturbance leading to nest abandonment would violate state and federal laws and constitute significant impacts of the Project. To avoid and minimize the potential for construction-related mortality and

disturbance of nesting birds, including the tricolored blackbird, MM BIO-4 through BIO-6 would reduce impacts to a less-than-significant level. MM BIO-4 advises that construction occurs outside of the avian nesting season (February 1 to August 31), if feasible. MM BIO-5 requires preconstruction surveys and specific parameters for those surveys if construction must occur during nesting season, and MM BIO-6 requires disturbance-free buffers if tricolored blackbird nests are discovered during preconstruction surveys.

NORTHERN HARRIER

One special-status animal, the northern harrier, has the potential to forage on the site from time to time but would not breed on the site or near enough to the site that they could experience significant Project-related disturbance at their nest sites. Foraging individuals of this species would not be vulnerable to construction-related injury or mortality because they are highly mobile and would be expected to simply avoid active work areas. The Project site does not offer any unique foraging habitat, with many square miles of similar or higher quality foraging habitat abundant in the region. Therefore, the Project is not expected to adversely affect this species from loss of foraging habitat. Potential Project impacts to the northern harrier are considered less than significant.

Conclusion

Suitability of the Project site for most native wildlife species is greatly limited by its long history of agricultural use, lack of aquatic habitat, and proximity to urban development. The decades of farming on the site have resulted in unsuitable habitat conditions for all 16 of these plant species on the Project site; however, there is the potential for three special-status wildlife species to occur. Although implementation of MM BIO-1 through MM BIO-6 would protect, avoid, and minimize impacts to special-status wildlife species. When implemented, these measures would reduce impacts to these species to below significant levels.

MITIGATION MEASURES

MM BIO-1: To avoid impacts to nesting Swainson's hawks, construction activities shall occur, where possible, outside the nesting season, typically defined as March 1 to September 15.

MM BIO-2: If project-related activities must occur between March 1 and September 15, a qualified biologist shall conduct surveys prior to the start of construction for active Swainson's hawk nests within a half mile of the site in accordance with the *Swainson's Hawk Technical Advisory Committee (SHTAC) (2000)* guidelines. The guidelines define five survey periods for Swainson's hawk: Period I: January 1-March 20; Period II: March 20-April 5; Period III: April 5-April 20; Period IV: April 21-June 10; and Period V: June 10-July 30. The guidelines prescribe a minimum of three surveys per survey period for at least the two survey periods immediately prior to a project's initiation, and specifically recommend that surveys be completed in Periods II, III, and V. A copy of the surveys' results shall be provided to the City prior to the issuance of grading or building permits.

MM BIO-3: Should any active Swainson's hawk nests be discovered within the survey area, an appropriate disturbance-free buffer shall be established based on local conditions and agency guidelines. Disturbance-free buffers shall be maintained until a qualified biologist has determined that the young have fledged and are capable of foraging independently.

MM BIO-4: If feasible, the Project shall be implemented outside of the avian nesting season, typically defined as February 1 to August 31.

MM BIO-5: If construction must occur between February 1 and August 31, a qualified biologist shall conduct pre-construction surveys for active bird nests within 10 days prior to the start of construction. The survey area shall encompass the site and accessible surrounding lands within 250 feet for nesting migratory birds and 500 feet for raptors (i.e., birds of prey).

MM BIO-6: Should any active nests be discovered in or near proposed construction zones, the biologist shall identify a suitable construction-free buffer around the nest. This buffer shall be identified on the ground with flagging or fencing and shall be maintained until the biologist has determined that the young have fledged and are capable of foraging independently.

LEVEL OF SIGNIFICANCE

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

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

California Sensitive Natural Communities are natural communities designated by CDFW as having limited distribution, distinguished by significant biological diversity, home to special-status plant and animal species, and of importance in maintaining water quality or sustaining flows, etc. No habitats designated as a Sensitive Natural Community by CDFW or any other sensitive habitats are present on the site.

The U.S. Fish and Wildlife Service (USFWS) often designates areas of "critical habitat" when it lists species as threatened or endangered. Critical habitat is a specific geographic area(s) that contains features essential for the conservation of a threatened or endangered species and that may require special management and protection. Designated critical habitat is absent from the Project site and surrounding lands.

As discussed in Impact #3.4.4a above, according to the Biological Evaluation prepared for this Project, Sensitive Natural Communities and Designated Critical Habitat are absent from the Project site and surrounding lands. Project development would have no impact on Sensitive Natural Communities or Designated Critical Habitat.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

There would be *no impact*.

Impact #3.4.4c – Would the Project have a substantial adverse effect on State or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Section 404 of the federal Clean Water Act (CWA) regulates the discharge of dredged or fill material into “navigable waters” (33 U.S.C. §1344), defined in the CWA as “the waters of the United States, including the territorial seas” (33 U.S.C. §1362(7)). Under the Porter-Cologne Water Quality Control Act of 1969, the State Water Resources Control Board has regulatory authority to protect the water quality of all surface water and groundwater in the State of California (“waters of the State”).

As mentioned in Impact #3.4.4a above, the Project site lacks an aquatic habitat (Live Oak Associates, Inc., 2023). Amphibians are expected to be absent from the Project site due to the absence of aquatic habitat on or near the site. Based on a review of the U.S. Department of the Interior, Fish & Wildlife Service’s National Wetland Inventory (NWI) Map, wetlands are not depicted at the Project site or in the vicinity of the Project. Therefore, there would be no impact to federally protected wetlands or waterways or State wetlands or waters.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

There would be *no impact*.

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

Wildlife movement corridors are routes that animals regularly and predictably follow during seasonal migration, dispersal from native ranges, daily travel within home ranges, and inter-population movements. Movement corridors in California are typically associated with valleys, rivers, and creeks supporting riparian vegetation and ridgelines. The closest wildlife movement corridor would be along Ash and Berenda Sloughs, over one mile east. Wildlife movement corridors are absent from the Project site (Live Oak Associates, Inc., 2023). Therefore, the Project will have no impact on wildlife movement corridors.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

There would be *no impact*.

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

As previously discussed in Impact #3.4.1b Aesthetics, the palm trees lining Robertson Boulevard are identified in the City's General Plan as a significant visual characteristic of the Planning Areas and are a listed California Point of Historical Interest (City of Chowchilla, 2010) (Archaeological Resources Technology (ART), 2023). The palm trees are not located on the Project site and will not be damaged as a result of the Project development. However, in the event the trees cannot be avoided, MM AES-1 requires the developer to hire a professional arborist to relocate the impacted trees to a nearby location along Robertson Boulevard and to maintain the tree(s) for a minimum of 12 months to ensure viability. There will be a less-than-significant impact to the protected trees with mitigations implemented.

MITIGATION MEASURE(S)

Implement MM AES-1.

LEVEL OF SIGNIFICANCE

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

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

Based on review of the Habitat Conservation Plan (HCP) and California Natural Community Conservation Plan (NCCP) databases, the Project site is not located within a conservation plan area or other local habitat conservation plan. Therefore, there would be no impact.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

There would be *no impact*.

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

Would the Project:

a. Cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5?	☐	☒	☐	☐
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5?	☐	☒	☐	☐
d. Disturb any human remains, including those interred outside of formal cemeteries?	☐	☒	☐	☐

Discussion

In this section, the analysis focuses on the impacts associated with the Project site and related improvements. For the purposes of this analysis, the Annexation Only Area has no new development or change in land use proposed, and this area is considered part of the baseline.

This section is substantiated, in part, with a Cultural Resources Assessment prepared for this Project, which is attached as Appendix A (Archaeological Resources Technology (ART), 2023).

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

The Chowchilla General Plan states that the City's Heritage Preservation Commission completed a Historical Resources Reconnaissance Survey in April 2007, which identified 71 historical resources that have been evaluated as potentially eligible for listing in the City's Local Register of Historical Resources. The City does not have historic sites listed on the National Register of Historic Places.

Records Search Results

A records search at the SSJVIC of the California Historical Resources Information Service (File No. 22-490) (Archaeological Resources Technology (ART), 2023). To identify historic properties, the following was consulted: State of California Office of Historic Preservation Historic Properties Directory, which includes properties of the National Register of Historic Places, California Historical Landmarks, California Points of Historical Interest, the California Register of Historical Resources, as well as certified local government surveys that have

undergone Section 106 review. Pertinent maps and files indicated the specific Project area had not been studied previously. As previously mentioned in Impact #3.4.1b Aesthetics and #3.4.4e Biological Resources, results of the records search indicated that the Project is located adjacent to Primary #20-2519 (row of palms), a California Point of Historical Interest listed in 1989. As previously discussed, the palm trees lining Robertson Boulevard directly west of the Project site are identified in the City's General Plan as a significant visual characteristic of the Planning Areas and are a listed California Point of Historical Interest (Archaeological Resources Technology (ART), 2023). As discussed in Impact #3.4.1b Aesthetics, the row of palm trees adjacent to the Project site will not be damaged as a result of the Project. However, in the event one or more of the palm trees must be moved due to implementation of the Project, MM AES-1 requires the developer to hire a professional arborist to relocate the impacted trees to a nearby location along Robertson Boulevard and to maintain the tree(s) for a minimum of 12 months to ensure viability. Implementation of AES-1 will reduce impacts to this resource to a less-than-significant level.

In 2004, a small cultural resources survey (5.83 acres) took place near the subject Project's northern boundary (Lloyd *et al.* 2004). The results of that survey were negative. In 2009, Caltrans performed an inventory of Caltrans District 6 rural highways that encompassed State Route 233 (Robertson Boulevard). During the linear survey at that time, the Southern Pacific Railroad (SPRR) portion and the existing row of palms (P-20-002519) were noted. Although little information was available on file for the specific Project area, knowledge that the arid area was used historically for agriculture, in addition to the known lack of natural resources that would have supported a prehistoric population in the specific Project location, precludes a high cultural sensitivity for this location.

Field Survey Methods and Results

A field survey was conducted on June 19, 2023, by ART. For the survey, historic items were defined as any evidence of human use or habitation older than 50 years. During the survey, stone tools and production flakes, bone, fire-altered rock, marine shell, beads, historic artifacts, and features, or any other evidence of human activities, were sought. The Project area and immediately surrounding areas were inspected using tight transects (one to three meters). Results of ART's intensive foot reconnaissance for archaeology were negative.

Tribal Consultation

On January 28, 2026, pursuant to Public Resources Code Section 21080.3.1 and Government Code Section 65300 *et seq*, Senate Bill 18, letters were sent to each of the Native American tribes within the geographic area as identified by the NAHC (see Appendix A) and will close on April 28, 2026. No tribe requested consultation. On October 21, 2025, pursuant to Assembly Bill 52, letters were sent to each of the Native American tribes within the geographic area as identified by the NAHC (see Appendix A), and the commenting period was closed on November 21, 2025. The letters included a Project description and location maps.

Although unlikely, in the event that a concentration of artifacts or culturally modified soil deposits (including trash pits older than 50 years) is discovered at any time during Project construction, MM CUL-1 would require protocols to reduce impacts to unknown historic and cultural resources, if discovered during Project construction.

With implementation of MM CUL-1, the Project would have a less-than-significant impact on unknown and known historical resources located in the Project site.

MITIGATION MEASURE(S)

Implement MM AES-1.

MM CUL-1: In the event that a concentration of artifacts or culturally modified soil deposits (including trash pits older than 50 years) is discovered at any time during Project construction, all work shall stop until a qualified archaeologist views the find to make a preliminary evaluation. If warranted, further archaeological work in the discovery area shall be performed. A copy of all reports shall be provided to the City.

LEVEL OF SIGNIFICANCE

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

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

See also discussion for Impact #3.4.5a, above.

Although unlikely, given the absence of any archaeological resources on or in the vicinity of the Project site, subsurface construction activities associated with the proposed Project could damage or destroy undiscovered archaeological resources, which would be considered a potentially significant impact. Mitigation is proposed, requiring implementation of standard inadvertent discovery procedures to reduce potential impacts to previously undiscovered subsurface historic and archaeological resources.

MITIGATION MEASURE(S)

Implement MM CUL-1.

LEVEL OF SIGNIFICANCE

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

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

Human remains, including known cemeteries, are not known to exist within the Project area. However, construction would involve earth-disturbing activities, and it is still possible that

human remains may be discovered, possibly in association with archaeological sites. MM CUL-2 has been included in the unlikely event that human remains are found during ground-disturbing activities. Impacts would be less than significant with implementation of mitigation.

MITIGATION MEASURE(S)

MM CUL-2: In the event that human remains are unearthed during excavation and grading activities of any development at the Project, all activity shall cease immediately. Pursuant to Health and Safety Code (HSC) Section 7050.5, no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98(a). If the remains are determined to be of Native American descent, the coroner shall, within 24 hours, notify the NAHC. The NAHC shall then contact the most likely descendant of the deceased Native American, who shall then serve as the consultant on how to proceed with the remains. Pursuant to PRC Section 5097.98(b), upon the discovery of Native American remains, the landowner shall ensure that the immediate vicinity, according to generally accepted cultural or archaeological standards or practices, where the Native American human remains are located is not damaged or disturbed by further development activity until the landowner has discussed and conferred with the most likely descendants regarding their recommendations, if applicable, taking into account the possibility of multiple human remains. The landowner shall discuss and confer with the descendants all reasonable options regarding the descendants' preferences for treatment.

LEVEL OF SIGNIFICANCE

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

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

Would the Project:

- | | | | | |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation? | ☐ | ☐ | ☒ | ☐ |
| b. Conflict with or obstruct a State or local plan for renewable energy or energy efficiency? | ☐ | ☐ | ☒ | ☐ |

In this section, the analysis focuses on the impacts associated with the Project site and related improvements. For the purposes of this analysis, the Annexation Only Area has no new development or change in land use proposed, and this area is considered part of the baseline.

The analysis in this section is substantiated, in part, by an Air Quality and Greenhouse Gas Analysis memorandum prepared for this Project (LSA, 2026), and attached as Appendix B.

Discussion

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

Construction

Energy usage would be required to construct the proposed Project. Construction activities include standard construction processes such as grading, paving, trenching, architectural coating, and building construction. There are no unusual Project characteristics or construction processes that would require the use of equipment that would be more energy-intensive than is used for comparable activities. The primary sources of energy for construction activities are diesel and gasoline (i.e., petroleum fuels). All construction equipment is required to conform to current emissions standards and related fuel efficiencies, including applicable CARB regulations and California Energy Code Standards. Current regulations for construction equipment, heavy-duty equipment, and earthmoving equipment used in construction contribute to reductions in energy as well as reductions in pollutant emissions. California implemented its In-Use Off-Road Diesel-Fueled Fleets regulations (off-road regulations) that apply to all self-propelled off-road diesel vehicles with 25 horsepower or greater and to most two-engine vehicles. The Small Off-Road Engines

Program was implemented by California to apply to categories of outdoor powered equipment and specialty vehicles often used in construction.

Operation (post-construction)

Electrical energy for the City of Chowchilla is provided by PG&E, and the Project would utilize all electric appliances. General Plan Policy PF 10.1 of the Public Facilities and Services Element requires that development proposals be circulated to local utility providers, including PG&E, for their review and comment to ensure that they can and will provide service to the development. The estimated potential increase in electricity demand associated with the operation of the proposed Project is 1,104,137 kilowatt-hours per year (LSA, 2026). Total electricity consumption in Madera County in 2022 was 1,808,229,048 kilowatt-hours. Therefore, the operation of the proposed Project would increase the annual electricity consumption in Madera County by approximately 0.06 percent.

The Project and proposed residences will not utilize natural gas; all residential units will be equipped with 450-watt solar panels, utilize all electric appliances, and will be EV-ready (pre-wired during construction to allow for installation of EV residential charger in the future). The rooftop solar will help offset electricity usage during operation. Pre-wiring homes reduces the homeowners' cost to retrofit the home in order to use an EV vehicle. The subdivision has been designed, to the extent feasible, to take advantage of natural heating and cooling opportunities by requiring that 60 percent of the homes in this tract face north or south. The newly constructed residential units would be required to comply with the current 2022 CALGreen Tier 2 Residential Measure (A4.106.8) standards, which require EV-capable or EVSE-ready outlet provisions. In 2022, CARB approved the Advanced Clean Cars II rule. The rule establishes the goal that by 2035, 100 percent of new cars and light trucks sold in California will be zero-emission vehicles, including plug-in hybrid electric vehicles. As a result, compliance with CALGreen would decrease vehicle fuel energy consumption associated with the Project.

Furthermore, the Project will adhere to all applicable California Building Code (CBC) in design, construction and waste management. Construction associated with the Project would be required to comply with California's Title 24 energy efficiency requirements which also includes the 2022 California Green Building Standards Code and other applicable City development standards. Title 24 standards would require energy-saving building features. Energy demand during the construction phase would result from the transportation of materials, construction equipment and construction worker vehicle trips.

Therefore, the Project is expected to not utilize natural gas, comply with Title 24 energy efficiency requirements and increase energy consumption by a nominal 0.06 percent for Madera County as a whole. Therefore, the Project would result in a less-than-significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

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

The City of Chowchilla 2040 General Plan states that the City is committed to reducing the carbon footprint of the City and minimizing new development's contribution to global warming. Applicable state and local plans for renewable energy and energy efficiency will apply to the proposed Project. In addition, each project proposed within the City of Chowchilla will be reviewed and approved prior to construction in order to confirm compliance with applicable energy policies. The Project will be required to implement all applicable development standards pursuant to the City of Chowchilla, Building Energy Efficiency Standards - Title 24, and California Green Building Code. Compliance with Title 24 of the California Code of Regulations (CCR) would improve energy efficiency and consumption. Therefore, the Project would be consistent with applicable plans related to renewable energy and energy efficiency. As a result, the Project will not conflict with or obstruct a State or local plan for renewable energy or energy efficiency, and therefore, would cause a less-than-significant impact.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impact would be *less than significant*.

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

Would the Project:

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

In this section, the analysis focuses on the impacts associated with the Project site and

related improvements. For the purposes of this analysis, the Annexation Only Area has no new development or change in land use proposed, and this area is considered part of the baseline.

Discussion in this section is substantiated, in part, by a Phase I Environmental Site Assessment prepared for this Project, attached as Appendix D (Krazan & Associates, Inc., 2026).

Discussion

Impact #3.4.7a(i) – Would the Project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

The Project site is not located within an Alquist-Priolo earthquake fault zone. According to the Department of Conservation, California Geological Survey Regulatory Maps (California Department of Conservation, 2026c). The nearest fault is the Ortigalita Fault, which is approximately 68 miles southwest of the Project site. No known active or potentially active faults or instability are found in the 2040 General Plan Planning Area (City of Chowchilla, 2014). Therefore, impacts would be considered less than significant.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

Impact #3.4.7a(ii) – Would the Project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?

As discussed in Impact #3.4.7a(i) above, no known geologically active or potentially active faults or instability are found in the 2040 General Plan Planning Area. However, the Planning Area could be subject to ground movement and shaking resulting from a distant earthquake (City of Chowchilla, 2014). As a rule, the greater the earthquake magnitude and the closer the fault rupture to the site, the greater the intensity of ground shaking. However, different geologic materials respond differently to earthquake waves. The composition of underlying soils, even those relatively distant from faults, can intensify ground shaking.

The California Geological Survey and U.S. Geological Survey conduct a Probabilistic Seismic Hazard Analysis based on historic earthquakes, slip rates on major faults, and deformation

throughout the region, and the potential for amplification of seismic waves by near-surface geologic materials. The resulting earthquake shaking potential is used in developing building code design values, estimating future earthquake losses, and prioritizing earthquake retrofit. Although the Project site could potentially experience ground shaking, the magnitude of the hazard would not be anticipated to be severe or cause potential substantial adverse effects, including the risk of loss, injury, or death. All Project infrastructure would be subject to applicable requirements of the City Building Standards and Specifications, as well as the current California Building Standards Code (CCR Title 24), and would be built to withstand seismic ground shaking causing minimum to no risk of loss, injury, or death. Therefore, impacts are considered to be less than significant.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impact would be *less than significant*.

Impact #3.4.7a(iii) – Would the Project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?

Liquefaction could result in local areas during a strong earthquake or seismic ground shaking, where unconsolidated sediments and a high-water table coincide. According to the Madera County General Plan, although there are areas within the county where the water table is at 30 feet or less below the surface, soil types in the area are not conducive to liquefaction because they are either too coarse in texture or too high in clay content. The groundwater at the Project site is at a depth of approximately 290 feet, and has Grangeville fine sandy loam and Tujunga loamy sand soil types (Krazan & Associates, Inc., 2026). As discussed in Impact #3.4.7a(i) above, the nearest active fault is approximately 68 miles southwest of the Project site, and the Project site is relatively flat, minimizing the potential for risk of loss, injury, or death involving seismic-related ground failure. Therefore, given soil type, depth of groundwater, low likelihood of seismic-related failure, and safeguarding provided through Title 24 construction standards, the impact caused by liquefaction would be less than significant.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

Impact #3.4.7a(iv) – Would the Project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?

The Project site is flat topography and is predominantly vacant, with the exception of a warehouse building that will be demolished prior to construction by obtaining the proper permits. The Project site is classified by the California Geological Survey Landslide database as an area that does not experience landslides (United States Geological Survey, 2026). Since the site is substantially flat in nature with no surrounding slopes and is not considered to be prone to landslides, the Project would not expose people or structures to potential substantial adverse effects from landslides. Therefore, there would be no impact.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

There would be *no impact*.

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

Construction activities involving clearing, grading, or excavation that cause soil disturbance on one or more acres (or any project involving less than one acre that is part of a larger development plan and includes clearing, grading, or excavation) will be subject to coverage under the State's National Pollutant Discharge Elimination System (NPDES) General Construction Stormwater Permit (City of Chowchilla, 2010). Project applicants are required to prepare and comply with a Stormwater Pollution Prevention Plan (SWPPP) that specifies Best Management Practices (BMPs) to avoid soil erosion and associated pollution of waterways and are also required to report any water pollution and remediate the pollution occurrence. The City of Chowchilla operates under a statewide NPDES permit to discharge urban runoff from Municipal Separate Storm Sewer Systems (MS4s) within their municipal jurisdiction.

The City of Chowchilla Planning Department will require an erosion control plan SWPPP be developed and approved by the City of Chowchilla for the Project prior to initiating construction of the Project. The SWPPP estimates the sediment risk associated with construction activities and includes BMPs to control erosion, including sediment tracking and waste management controls. The Project may result in the loss of topsoil as a result of grading operations; however, the topsoil may be stockpiled and reused in landscape or nonstructural areas of the Project. Implementation of the SWPPP, which has been incorporated as MM GEO-1, would reduce the potential for construction activities from the Project site to a less-than-significant result in soil erosion or loss of topsoil.

Once constructed, the Project will have both impermeable surfaces and permeable surfaces. Impermeable surfaces would include roadways, driveways, and structures. Permeable surfaces would include open areas of the site and landscaped areas. In addition to landscaping throughout the Project site, the Project will incorporate permeable surfaces through the development of the proposed outlots:

- Outlot A is designated for a retention pond and park
- Outlot B is designated as an emergency/fire access road recreation trail
- Outlot C is designated as open space, and a recreation trail is planned

The retention pond and open space areas can aid in stormwater retention. This can reduce erosion and allow stormwater to percolate for groundwater recharge. Furthermore, General Plan Policy PF-7.4 requires that all new development projects prepare and provide appropriate drainage studies that assess Project storm runoff, and Policy PF-7.5 requires that all drainage improvements comply with the City's Public Works Construction Standards. Overall, the Project site after buildout of the Project would not result in conditions where substantial surface soil would be exposed or lost due to wind and water erosion, and implementation of the MM GEO-1 SWPPP and BMP requirements would mitigate erosion of soils during construction activities to less than significant.

MITIGATION MEASURE(S)

MM GEO-1: Prior to ground-disturbing activities, the Project proponent/developer shall prepare and implement a SWPPP that specifies BMPs, with the intent of keeping all products of erosion from moving off-site. The SWPPP shall include a site map that shows the construction site perimeter, existing and proposed manmade facilities, stormwater collection and discharge points, general topography both before and after construction, and drainage patterns across the Project site. Additionally, the SWPPP shall contain a visual monitoring program and a chemical monitoring program for non-visible pollutants to be implemented (if there is a failure of best management practices). The requirements of the SWPPP and BMPs shall be incorporated into design specifications and construction contracts. Recommended best management practices for the construction phase may include the following:

- Stockpiling and disposing of demolition debris, concrete, and soil properly.
- Protecting any existing storm drain inlets and stabilizing disturbed areas.
- Implementing erosion controls.
- Properly managing construction materials.
- Managing waste, aggressively controlling litter, and implementing sediment controls.

LEVEL OF SIGNIFICANCE

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

Impact #3.4.7c – Would the Project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

As previously discussed in Impact #3.4.7a(i)–(iv) above, the site soils are considered stable in that there is no potential for on- or off-site landslides, lateral spreading, subsidence, or collapse. According to the United States Department of Agriculture (USDA) Natural Resources Conservation Services, soils at the subject site are described as Grangeville fine

sandy loam over Traver soils in the northwestern portion (71.1 percent of the Project area) and Tujunga loamy sand in the southwestern portion (27.7 percent of the Project area). A lesser area of Grangeville fine sandy loam, deep over alkali hardpan (1.2 percent of the Project area) was noted along the northeastern boundary.

The existing topography is flat with no apparent unique or significant landforms. There are no geologic hazards or unstable soil conditions known to exist on the Project site. The potential for on-site or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse is not considered a hazard to the Project. Development of the property requires compliance with the grading and drainage standards of the City of Chowchilla. A civil engineer or soils engineer registered in California shall complete a Soils Investigation and Evaluation Report during the preparation of the improvement plans, once final plans are determined. The investigation and subsequent report shall provide detailed recommendations for structure configurations, locations, foundations, footings, drainage, and other items as necessary. The preparation of the Soils Investigation and Evaluation Report is an existing standard and has been incorporated as MM GEO-2. The Project is not located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project; therefore, the impacts are considered less than significant with mitigation.

MITIGATION MEASURE(S)

MM GEO-2: A civil engineer or soils engineer registered in California shall complete a Soils Investigation and Evaluation Report during the preparation of the improvement plans, once determined. The investigation and subsequent report shall provide detailed recommendations for structural configurations, locations, foundations, footings, drainage, and other items as necessary, for review and approval by the Public Works Department.

LEVEL OF SIGNIFICANCE

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

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

Expansive soils contain large amounts of clay, which absorb water and cause the soil to increase in volume. According to the USDA Natural Resources Conservation Service, soils at the subject site are described as Grangeville fine sandy loam (GcA) and Tujunga loamy sand (GhA), with a lesser area of Tujunga loamy sand (TwA).

Grangeville fine sandy loam (GcA) is described as alluvium derived from granite, somewhat poorly drained, with a soil profile of fine sandy loam from 0 to 20 inches, stratified sandy loam to loamy fine sand to loam from 20 to 40 inches, and loam from 40 to 60 inches. Grangeville fine sandy loam (GhA) is described as alluvium derived from granite, somewhat poorly drained, with a soil profile of fine sandy loam from 0 to 11 inches, sandy loam from 11 to 40 inches, and cemented from 40 to 60 inches. Tujunga loamy sand (TwA) is described

as sandy alluvium derived from granite, somewhat excessively drained, with a soil profile of loamy sand from 0 to 11 inches, stratified loamy sand to coarse sand from 11 to 24 inches and stratified gravelly sand to gravelly coarse sand to gravelly gravel from 24 to 60 inches.

The City adopted the Uniform Building Code and the CCR Title 24, also known as the California Building Standards Code or California Building Code (CBC). The CBC includes standard engineering practices requiring special design and construction methods that reduce or eliminate potential expansive soil-related impacts. Compliance with CBC regulations ensures the adequate design and construction of building foundations to resist soil movement. In addition, the CBC also contains drainage-related requirements to control surface drainage and reduce seasonal fluctuations in soil moisture content. As discussed previously in Impact #3.4.7c above, MM GEO-2 requires a Soils and Investigation and Evaluation Report that would provide detailed recommendations for structure configurations, locations, foundations, footings, drainage, and other items as necessary at the review and approval of the Public Works Department.

MITIGATION MEASURE(S)

Implement MM GEO-2.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant with mitigation*.

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

Once annexed into the City, the Project site would utilize the City's wastewater system for waste disposal services. The installation of a septic tank or alternative wastewater disposal system is not proposed; therefore, there would be no impact.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

The Project would have *no impact*.

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

There are no known unique paleontological resources or unique geologic features known to the City of Chowchilla or the County of Madera at the Project site. Nevertheless, previously unknown paleontological resources could be disturbed during Project construction, and to reduce impacts to unknown paleontological resources, MM GEO-3 has been incorporated.

MM GEO-3 establishes protocols in the event of a paleontological discovery during construction. Therefore, with mitigation, the impact would be less than significant.

MITIGATION MEASURE(S)

MM GEO-3: In the event that unique paleontological or geological resources are discovered during excavation and/or construction activities, construction shall stop in the immediate vicinity of the find, and a qualified paleontologist shall be consulted to determine whether the resource requires further study. The qualified paleontologist shall make recommendations to the City on the measures that shall be implemented to protect the discovered resources, including but not limited to excavation of the finds and evaluation of the finds. If the resources are determined to be significant, mitigation measures shall be identified by the monitor and recommended to the Lead Agency. Appropriate mitigation measures for significant resources could include avoidance or capping, incorporation of the site in green space, parks, or open space, or data recovery excavations of the finds. No further grading shall occur in the area of the discovery until the Lead Agency approves the measures to protect these resources. Any paleontological/geological resources recovered as a result of mitigation shall be provided to a City-approved institution or person who is capable of providing long-term preservation to allow future scientific study.

LEVEL OF SIGNIFICANCE

There would be a *less-than-significant impact with mitigation incorporated*.

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

Would the Project:

- | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? | ☐ | ☐ | ☒ | ☐ |
| b. Conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases? | ☐ | ☐ | ☒ | ☐ |

In this section, the analysis focuses on the impacts associated with the Project site and related improvements. For the purposes of this analysis, the Annexation Only Area has no new development or change in land use proposed, and this area is considered part of the baseline.

The analysis in this section is based on the Air Quality and Greenhouse Gas Analysis memorandum prepared for this Project (LSA, 2026) and a Vehicles Miles Traveled (VMT) Analysis memorandum (LSA, 2025a), attached as Appendix B and F, respectively.

Discussion

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

GHG emissions associated with the Project would occur over the short-term from construction activities, consisting primarily of emissions from equipment exhaust. There would also be long-term GHG emissions associated with Project-related vehicle trips. Recognizing that the field of global climate change analysis is rapidly evolving, the approaches advocated most recently indicate that for determining a project's contribution to GHG emissions, lead agencies should calculate, or estimate, emissions from vehicular traffic, energy consumption, water conveyance and treatment, waste generation, construction activities, and any other significant source of emissions within the Project area. The CalEEMod results were used to quantify GHG emissions generated by the Project.

Construction

Construction-related GHG emissions are typically emitted through the operation of construction equipment and from worker and builder supply vendor vehicles, each of which typically uses fossil-based fuels to operate. Construction activities, such as grading, site preparation, and construction; on-site construction vehicles; equipment hauling materials to and from a project site; and motor vehicles transporting the construction crew, typically

produce combustion emissions from various sources. The SJVAPCD does not have an adopted threshold of significance for construction-related GHG emissions. However, lead agencies are encouraged to quantify and disclose GHG emissions that would occur during construction. Using CalEEMod, it is estimated that construction of the proposed Project would generate a total of approximately 697.7 metric tons (MT) of CO₂e. Construction GHG emissions were amortized over the life of the Project (assumed to be 30 years) and added to the operational emissions. When annualized over the life of the Project, amortized construction emissions would be approximately 23.3 MT CO₂e per year.

Operational (post-construction)

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

Emissions estimates for the operation of the proposed Project were calculated using CalEEMod. Table 3.4.8-1 shows the emissions sources by category; mobile-source emissions are the largest category, at approximately 86 percent of total CO₂e emissions, followed by area-source emissions at approximately six percent of the total, energy sources at approximately five percent of the total, waste source emissions at approximately two percent of the total, and water-source emissions with one percent of the total emissions. The proposed Project would generate approximately 1,813.9 MT CO₂e annually.

Significance Threshold Analysis

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

implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions.

Table 3.4.8-1
Operational Greenhouse Gas Emissions

Emissions Category	CO ₂	Operational Emissions			Percent Total
		CH ₄	N ₂ O	CO ₂ e	
Mobile Source	1,551.0	0.1	0.1	1,580.0	88
Area Source	41.6	0.2	<0.1	46.2	2
Energy Source	102.2	<0.1	<0.1	103.2	6
Water Source	5.9	0.3	<0.1	14.3	1
Water Source	13.4	1.3	<0.1	46.9	3
Total Operational				1,790.6	100.0
Amortized Construction Emissions				23.3	-
Total Emissions				1,813.9	-

Source: (LSA, 2026)

Notes: Some values may not appear to add up correctly due to rounding. CH₄ = methane, CO₂ = carbon dioxide, CO₂e = carbon dioxide equivalent, N₂O = nitrous oxide

Neither the City of Chowchilla, the County of Madera, nor the SJVAPCD has developed or adopted numeric GHG significance thresholds. Therefore, in the absence of any County or SJVAPCD-specific guidelines or thresholds, this analysis evaluates the proposed Project for consistency with the Bay Area Air District's Justification Report: *CEQA Thresholds for Evaluating the Significance of Climate Impacts from Land Use Projects and Plans* (Justification Report). In April 2022, the Bay Area Air District adopted the Justification Report, which identifies the applicable GHG significance thresholds. These thresholds determine whether a project is consistent with California's efforts to achieve long-term climate goals, including carbon neutrality by 2045. If a project is designed and built to incorporate design elements related to natural gas, energy, VMT, and electric vehicles (EVs), then it would contribute its portion of what is necessary to achieve California's long-term climate goals—its "fair share"—and an agency reviewing the project under CEQA can conclude that the Project would not make a cumulatively considerable contribution to global climate change.

According to the Justification Report, a project would have a less-than-significant impact related to GHG emissions if it included the following project design elements:

- Buildings
 - The project will not include natural gas appliances or natural gas plumbing (in both residential and nonresidential development).
 - The project will not result in any wasteful, inefficient, or unnecessary electrical usage as determined by the analysis required under CEQA Section 21100(b)(3) and Section 15126.2(b) of the State CEQA Guidelines.
- Transportation
 - Achieve a reduction in project-generated VMT below the regional average, consistent with the current version of the California Climate Change Scoping Plan

(currently 15 percent) or meet a locally adopted SB 743 VMT target, reflecting the recommendations provided in the Governor's Office of Planning and Research's *Technical Advisory on Evaluating Transportation Impacts in CEQA*:

- Residential projects: 15 percent below the existing VMT per capita
- Office projects: 15 percent below the existing VMT per employee
- Retail projects: no net increase in existing VMT
- Achieve compliance with off-street EV requirements in the most recently adopted version of CALGreen Tier 2.

Natural Gas Usage

As discussed in Impact #3.4.6a Energy, the proposed Project will utilize all electric appliances and not utilize natural gas. Therefore, the Project would be consistent with requirement 1.a. of the Bay Area Air District's Justification Report for GHG emission thresholds of significance.

Electrical Usage

As discussed in Impact #3.4.6a Energy, all residential units will be equipped with 450-watt solar panels and will be EV-ready (pre-wired during construction to allow for installation of an EV residential charger in the future). Pre-wiring homes reduces the homeowners' cost to retrofit the home in order to use an EV vehicle. The Project will comply with 2022 CALGreen Tier 2 Residential Measure (A4.106.8) standards, Title 24 energy efficiency requirements and operations would increase energy consumption by a nominal 0.06 percent for Madera County as a whole. Therefore, the Project would not results significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation. The Project would be consistent with requirement 1.b. of the Bay Area Air District's Justification Report for GHG emission thresholds of significance.

Vehicle Miles Traveled Analysis

The City has adopted its Senate Bill 743 guidelines, City of Chowchilla CEQA Transportation Impact Study Guidelines, July 20, 2022 (guidelines). Therefore, Project VMT analysis was conducted using the methodology and significant threshold criteria identified in the City's guidelines. The Project includes two types of residential land uses – market-rate attached single-family units and affordable (below-market-rate) multi-family dwelling units. The guidelines recommend the use of VMT per capita as the VMT metric to evaluate residential uses; therefore, the Project was evaluated using VMT per capita. The City of Chowchilla's VMT per capita threshold is 8.5, so the Project VMT greater than 8.5 would be considered a significant impact.

The VMT analysis utilized the Madera County Transportation Commission's Travel Demand Model (MCTC Model). The current MCTC Model includes household characteristics/variables such as household income, size, population age, and dwelling unit type to capture the trip-making differences for different household types. These household variables play a key role in different modeling steps, such as trip generation, trip distribution, and mode choice, and, as such, determine VMT of the households. Given that the Project includes both

market-rate and affordable housing units, the model was reviewed and tested for its ability to capture the trip-making characteristic differences between market-rate and affordable housing using the above-mentioned household variables. Based on the review and testing, it was concluded that the model's sensitivity to household variables such as income and size does not appropriately reflect the trip-making characteristic differences between market-rate and affordable housing identified in available research. This is because travel demand models are typically calibrated and validated at a regional level, and most of the households in the region represent market-rate units.

The guidelines suggest use of additional methodology that can be used for projects that have unique VMT characteristics. Given the limitations of the travel model in its ability to capture the VMT profile of affordable housing units, a combination of both a model and an off-model approach was used to develop the Project VMT metric/VMT per capita. The MCTC Model was used to develop VMT per capita for market-rate single-family housing units, whereas an off-model approach was used for the development of VMT per capita for affordable housing units. This methodology was presented to the City and was reviewed and approved by City Staff.

MARKET RATE ATTACHED SINGLE-FAMILY VEHICLE MILES TRAVELED – MCTC MODEL

To calculate the Project's VMT metric, the first step was to update the traffic analysis zones (TAZs) in the model that includes the Project area. The MCTC Model includes the capability to add new zones or conduct zone splits. Ideally, the Project should be isolated to evaluate the Project's VMT. Based on the review of Project land uses, it was determined that the addition of one new TAZ (for attached single-family residential) would be appropriate to incorporate the Project into the model. Therefore, one new TAZ was added in the Project location within the model, and the proposed Project socioeconomic data was added within this TAZ for the purposes of this analysis.

The analysis converted the Project land uses into model socioeconomic categories. The MCTC Model socioeconomic database for the baseline (2018) scenario was updated with the Project socioeconomic data. The outputs from this updated model were used to estimate Project VMT rates. Table 3.4.8-2, below, shows VMT for the Project single-family component from the MCTC Model.

Table 3.4.8-2
Market Rate Attached Single-Family VMT Per Capita

Baseline Scenario (2018)	Attached Single-Family Only
Households (a)	34
Population (b)	130
Total Home-based (HB) VMT ('c)	1,311
HB VMT per capita (d=c/b)	10.1

Source: (LSA, 2025a)

Notes:

MCTC = Madera County Transportation Commission

VMT = vehicle miles traveled

BELOW-MARKET-RATE/AFFORDABLE MULTI-FAMILY VMT OFF-MODEL

The “Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity – Designed for Local Governments, Communities, and Project Developers – October 2024” by the California Air Pollution Control Officers Association (CAPCOA) includes guidance about VMT for below-market-rate housing units. CAPCOA is widely used as guidance for the application and quantification of VMT. The CAPCOA handbook includes “T-4: Integrate Affordable and Below-Market-Rate Housing”. The research provides VMT characteristics of affordable/low-income housing units compared to market-rate housing units. This research has been used to adjust the single-family VMT per capita obtained from the MCTC model to estimate VMT per capita for the affordable housing units. Table 3.4.8-3 illustrates the estimation of VMT per capita for the affordable housing component of the Project.

**Table 3.4.8-3
Affordable Multi-Family VMT Per Capita – Off-Model**

Category	Results
Project Attached Single-Family VMT per capita (d)*	10.1
Percent reduction in VMT for affordable units ('e)**	28.6%
Affordable Multi-family VMT per capita (f = (1-e)*d)	7.2

Source: (LSA, 2025a)

Notes:

* Obtained from Table A above - MCTC Model

** CAPCOA Handbook 2024: Transportation Measure T-4. Integrate Affordable and Below Market Rate Housing

MCTC = Madera County Transportation Commission

VMT = vehicle miles traveled

Total home-based VMT for the Project’s affordable multi-family units was estimated in Table 3.4.8-4, below, using an average multi-family household size from the MCTC Model. Total home-based VMT for the affordable component was estimated to develop a weighted average VMT per capita for the entire Project.

**Table 3.4.8-4
Affordable Multi-Family Total Home-based VMT**

Category	Results
Affordable Multi-family VMT per capita (f)*	7.2
Number of Affordable Multi-family Units (g)	154
Affordable Multi-family Average Household Size (h) **	3.14
Total Affordable Multi-family Population (i=g*h)	483
Total Home-based VMT for Affordable Units (j=i*f)	3,488

Source: (LSA, 2025a)

Notes:

* Obtained from Table A above - MCTC Model

** CAPCOA Handbook 2024: Transportation Measure T-4. Integrate Affordable and Below-Market-Rate Housing

MCTC = Madera County Transportation Commission

VMT = vehicle miles traveled

As VMT is the product of trips and trip lengths, even if the average trip lengths for attached single-family and affordable housing units are assumed to be similar, affordable housing would produce approximately 33 percent less VMT compared to a market-rate attached single-family dwelling unit, based on the Institute of Transportation Engineers (ITE). As such, the use of CAPCOA to estimate the project's affordable housing VMT presents a conservative estimate.

VMT from both components of the Project, Single-Family VMT from the MCTC Model, and Affordable Multi-family VMT from the off-model approach, described above, to estimate VMT per capita for the entire Project (Table 3.4.8-5).

**Table 3.4.8-5
Total Project Home-based VMT**

Category	Results
Total Home-based VMT - Project Single-Family ('c)*	1,311
Total Home-based VMT - Project Affordable Units (j)**	3,488
Total Project Home-based VMT ($k=j+c$)	4,799
Total Population - Project Single-Family (b) *	130
Total Population - Project Affordable Units (i) **	483
Total Population - Entire Project ($l=b+i$)	612
HB VMT per capita - Entire Project ($m=k/l$)	7.8

Source: (LSA, 2025a)

* Obtained from Table A - MCTC Model

** Obtained from Table C

MCTC = Madera County Transportation Commission

VMT = vehicle miles traveled

As shown in Table 3.4.8-5, the VMT per capita for the Project is 7.8, which is less than the City of Chowchilla's VMT per capita threshold of 8.5. As such, based on the City of Chowchilla CEQA Transportation Impact Study Guidelines and methodology described in the VMT Memo, the proposed Project does not constitute a significant VMT impact. As such, the proposed Project would be consistent with requirement 2.a. of the Bay Area Air District's Justification Report for GHG emission thresholds of significance.

ELECTRIC VEHICLE REQUIREMENT

As previously discussed in Impact #3.4.6a Energy, the Project will be EV-ready (pre-wired during construction to allow for installation of EV residential charger in the future). Pre-wiring homes reduces the homeowners' cost to retrofit the home in order to use an EV vehicle. The newly constructed residential units would be required to comply with the current 2022 CALGreen Tier 2 Residential Measure (A4.106.8) standards, which require EV-capable or EVSE-ready outlet provisions. Therefore, the proposed Project would be consistent with requirement 2.b. of the Bay Area Air District's Justification Report for GHG emission thresholds of significance.

As demonstrated above, the proposed Project is consistent with all requirements in the Bay Area Air District's Justification Report for GHG emission thresholds of significance. Therefore, the proposed Project would not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment, and the impacts would be considered less than significant.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

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

2022 Scoping Plan

Executive Order (EO) B-30-15 added the immediate target of reducing GHG emissions to 40 percent below 1990 levels by 2030. CARB released a second update to the Scoping Plan, the 2017 Scoping Plan, to reflect the 2030 target set by EO B-30-15 (SB 32). SB 32 builds on AB 32 and keeps California on the path toward achieving its 2050 objective of reducing emissions to 80 percent below 1990 levels.

AB 197 provides additional direction to CARB related to the adoption of strategies to reduce GHG emissions. In addition, the 2022 Scoping Plan assesses progress toward the statutory 2030 target while laying out a path to achieving carbon neutrality no later than 2045. The 2022 Scoping Plan focuses on outcomes needed to achieve carbon neutrality by assessing paths for clean technology, energy deployment, natural and working lands, and others, and is designed to meet the State's long-term climate objectives and support a range of economic, environmental, energy security, environmental justice, and public health priorities.

As previously mentioned in Impact #3.4.8a above, the Bay Area Air District's Justification Report established guidance on how individual projects would be consistent with California's long-term climate goals and provides substantial evidence in supporting the use of its thresholds for projects throughout California because the thresholds are designed to meet the State's established GHG reduction goals, including the 2022 Scoping Plan goals. If a project is designed and built to incorporate these design elements related to VMT, natural gas, energy, and EVs, then it would contribute its portion of what is necessary to achieve California's long-term climate goals, and an agency reviewing the project under CEQA can conclude that the project would be consistent with the State's 2022 Scoping Plan. As discussed in Impact #3.4.6a *Energy*, the proposed Project is consistent with the Bay Area Air District's project design elements and would not generate substantial GHG emissions. As analyzed against the thresholds of significance, the proposed Project would be contributing its "fair share" of emissions reductions to support long-term State goals of GHG emission

reductions and carbon neutrality and would therefore be found to be consistent with regional and State goals and applicable plans for GHG emissions reductions.

2022 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS)

The MCTC 2022 RTP/SCS reflects transportation planning for Madera County through 2046. The vision, goals, and policies in the 2022 RTP/SCS are intended to serve as the foundation for both short- and long-term planning and guide implementation activities. The 2022 RTP/SCS includes transportation projects to more efficiently distribute population, housing, and employment growth, and to forecast development consistent with regional-level General Plan data. The actions in the 2022 RTP/SCS address all transportation modes (e.g., highways, local streets and roads, mass transportation, rail, bicycle, and aviation facilities and services) and consist of short- and long-term activities that address regional transportation needs. While the actions are organized into the five key policy areas, many support multiple goals and policies. Some actions are intended to support the SCS and directly reduce GHG emissions, while others focus on the RTP's broader goals. The 2022 RTP/SCS does not require that local General Plans, Specific Plans, or zoning be consistent with it, but it provides incentives for consistency for governments and developers.

As discussed in Impact #3.4.14a *Population and Housing*, the Project would result in an estimated total of approximately 664 people. The RTP is based on a projected population in the Madera region in 2046 of 1.35 million people. The entire 18.24-acre parcel would be annexed into the City of Chowchilla and pre-zoned to R-H, consistent with the City's HDR land use designation. Given the Project-generated population, and General Plan consistency is well within the forecasted growth for the region, the Project would not interfere with the MCTC's ability to achieve the region's GHG reductions.

The proposed Project is not regionally significant per State CEQA Guidelines Section 15206 (defined as a proposed shopping center or business establishment employing more than 1,000 persons or encompassing more than 500,000 square feet of floor space), and it would not conflict with the 2022 RTP targets because those targets were established and are applicable on a regional level. Therefore, it is anticipated that implementation of the proposed Project would not interfere with the MCTC's ability to implement the regional strategies outlined in the 2022 RTP/SCS.

Furthermore, MCTC uses the growth projections and land use information in adopted general plans to estimate future average daily trips and then VMT, which are then provided to SJVAPCD to estimate future emissions in the air quality plans (AQPs). Existing and future pollutant emissions computed in the AQP are based on land uses from the area's general plans. AQPs detail the control measures and emission reductions required for reaching attainment of the air standards. A project would be consistent with the SJVAPCD's air quality plan(s) if the pollutants emitted from the construction and operation of the project would not exceed the SJVAPCD emission thresholds or cause a significant impact on air quality. Therefore, the proposed Project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing emissions of GHGs.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than- Significant Impact	No Impact
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3.4.9 - HAZARDS AND HAZARDOUS MATERIALS

Would the Project:

- | | | | | | |
|----|--|--------------------------|-------------------------------------|-------------------------------------|-------------------------------------|
| a. | Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? | ☐ | ☐ | ☒ | ☐ |
| b. | Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment? | ☐ | ☒ | ☐ | ☐ |
| c. | Emit hazardous emissions or involve handling hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? | ☐ | ☐ | ☐ | ☒ |
| 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? | ☐ | ☐ | ☒ | ☐ |
| e. | For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project result in a safety hazard or excessive noise for people residing or working in the Project area? | ☐ | ☐ | ☒ | ☐ |
| f. | Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan? | ☐ | ☐ | ☒ | ☐ |
| g. | Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires? | ☐ | ☐ | ☒ | ☐ |

In this section, the analysis focuses on the impacts associated with the Project site and related improvements. For the purposes of this analysis, the Annexation Only Area has no new development or change in land use proposed, and this area is considered part of the baseline.

Discussion in this section is substantiated, in part, by a Phase I Environmental Site Assessment prepared for this Project, attached as Appendix D (Krazan & Associates, Inc., 2026).

Discussion

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

Construction

Construction of the Project would involve the temporary transport and use of minor quantities of hazardous materials such as fuels, oils, lubricants, hydraulic fluids, paints, and solvents. The types and quantities of hazardous materials to be used and stored on-site would not be of a significant amount to create a reasonably foreseeable upset or accident condition. Transportation, storage, use, and disposal of hazardous materials during construction activities will be required to comply with applicable federal, State, and local statutes and regulations. The U.S. Department of Transportation and Caltrans regulate the transportation of hazardous materials. Any hazardous waste or debris that is generated during the construction of the proposed Project would be collected and transported away from the site and disposed of at an approved off-site landfill or other such facilities. In addition, sanitary waste generated during construction would be managed through portable toilets located at reasonably accessible on-site locations.

The Madera County Hazardous Waste Management Plan (HWMP) suggests that transport of hazardous materials should be maximized on the highest tier roads, or highways and freeways, and minimized on the lowest tier, or minor roads, to the extent feasible (City of Chowchilla, 2014). The Madera County HWMP designates two routes within the General Plan Planning Areas for transporting hazardous materials - SR 99 and SR 152.

The Project will generate the need for temporary and minor quantities of hazardous waste transport during the construction period only. The impact of hazardous waste transport, as noted above, would comply with federal, local, and State transportation and handling requirements. Therefore, impacts related to Project construction would be less than significant.

Operation (post-construction)

Once constructed, the use of such materials as paint, bleach, etc., is considered common for residential developments. Residential developments are unlikely to have hazardous materials stored or used in such quantities that would be considered a significant hazard. The Project itself will not generate or use hazardous materials outside the Madera County Environmental Health Department requirements.

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

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

Impact #3.4.9b – Would the Project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Review of historical aerial photographs indicates that the subject site was utilized for agricultural purposes from 1937 to 1970. Agricultural uses have not been active on the Project site since 1970, and soil samples analyzed under the Phase I indicate a very low likelihood that pesticides or herbicides are present at concerning levels on the Project site (Krazan & Associates, Inc., 2026).

There is an existing metal warehouse building at the southwest corner of the property that will be demolished prior to the start of construction. This building was formerly occupied by Frank's Auto Service and is listed on the Department of Toxic Substances Control (DTSC) Hazardous Waste Tracking System. The former occupant is not listed on any federal, State, or local regulatory database indicating a release of hazardous materials has impacted the subject site, and hazardous waste appears to have been properly removed and transported off-site.

Two concrete pits were observed during the field survey inside the building that were likely used to aid in oil changes and auto repairs. Minor engine oil drips, other fluid drips, and staining typical of an auto repair shop were observed on the concrete floor of the building; however, the staining was *de minimus* and is not considered a concern. The concrete-lined pits will be removed and backfilled prior to redevelopment of the Project site. Based on historic site usage and since the condition of the floor of the pits was not observed, the inspection pits represent a recognized environmental concern (REC) (Krazan & Associates, Inc., 2026).

Since the bottom of these pits was not fully visible, and to reduce and/or eliminate the risk of release of hazardous materials, MM HAZ-1 would require that a qualified inspector be present on-site during demolition and excavation activities to inspect the pits, assess the condition of the subsurface soils, and collect soil samples, if necessary. If contaminated soils are found, the measure requires the removal of the soils and disposal at a qualified landfill. The measures also would require bringing in clean soil to backfill the pits prior to the start of construction.

No underground fuel storage tanks are known to be installed on the Project site. However, the warehouse also contained an office and reception area with a restroom constructed with finished wallboard. It is likely that a septic system was installed, and the septic storage tank

may still be in place. This system would be properly abandoned, removed, or destroyed in accordance with local and State regulations. MM HAZ-2 would require notification and removal of the septic system storage tanks in compliance with local and State requirements, if discovered during construction.

Given the building's age, it may have been constructed with asbestos-containing materials (ACMs) or lead-based paint (LBP), both of which were used until the late 1970s. Mitigation Measure HAZ-3 requires asbestos and lead-based paint testing prior to demolition of the existing structure. Additionally, the existing building contained a restroom that was serviced by a septic tank. MM HAZ-1 would require notification and removal of a septic tank in compliance with local and State requirements, if a septic tank is discovered during construction. Furthermore, demolition of the building would adhere to local, State and federal requirements, including a local demolition permit.

Mitigation Measures HAZ-1 through HAZ-3 would mitigate any risk associated with known and unknown hazardous materials on the Project site. As such, with mitigations implemented, the Project would not 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.

MITIGATION MEASURE(S)

MM HAZ-1: Prior to demolition of the existing warehouse structure, a qualified professional shall be retained. The inspector shall be present on-site during demolition and excavation of the existing concrete-lined inspection pits, to assess the subsurface condition inside the pits and to collect soil samples, as necessary. All findings shall be reported in writing to the City of Chowchilla.

If inspection of the pits and analysis of soil samples indicate no significant contamination screening levels, then no further action is needed. If warranted, additional remediation may include, but is not limited to, the removal of the contaminated soil and disposal at a qualified disposal facility, and bringing in clean soil.

MM HAZ-2: During construction activities, in the event an unknown underground storage tank(s) or a septic system is uncovered or damaged during excavation or grading activities, all work in that area shall cease. The State Water Resources Control Board (SWRCB) and the Madera County Environmental Health Division shall be contacted to determine what appropriate remediation may be required and to identify the appropriate requirements and approvals. A report of all communication and the determination made by the SWRCB and the County Public Health Division shall be submitted to the City.

MM HAZ-3: Prior to the start of the demolition of any existing structures on the Project site, a hazardous materials assessment of the existing building shall be performed by a certified asbestos consultant, notification shall be submitted to the SJVAPCD, and any abatement requirements shall be completed in order to obtain an approved demolition permit. A copy of the approved permit shall be submitted to the City as evidence of compliance.

If no regulated hazardous materials, such as lead-based paint or asbestos, are found during the assessment, no further action is necessary. A copy of that report shall be provided to the City as evidence of compliance.

LEVEL OF SIGNIFICANCE

Impacts would be *a less-than-significant impact with mitigation incorporated*.

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

There are no schools located within one-quarter mile of the Project site. The nearest school is Wilson Middle School, which is approximately 0.75 miles northeast of the Project site. Therefore, no hazardous materials or substances handled at the Project during construction would be emitted near an existing or proposed school, and there would be no impact.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

There would be **no impact**.

Impact #3.4.9d – Would the Project be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, and, as a result, would it create a significant hazard to the public or the environment?

The Project site is not listed as a hazardous materials site pursuant to Government Code Section 65962.5 (referred to as the Cortese list) and is not included on a list compiled by the DTSC. The subject site was not identified on any federal, State, or local regulatory database, indicating that a release of hazardous materials has impacted the subject site.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

Impact #3.4.9e – For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project result in a safety hazard or excessive noise for people residing or working in the Project area?

The County of Madera Airport Land Use Compatibility Plan (ALUCP) covers the Chowchilla Municipal Airport. The Chowchilla Municipal Airport is located approximately 1.50 miles northeast of the proposed Project site. The Project site is not located within the Runway Protection Zone, Airport Influence Area, or a Compatibility Zone. It is also outside of the noise hazard zones (60-65 dB CNEL) (Madera County, 2015). Therefore, impacts related to noise generated by an airport are less than significant.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

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

The purpose of the Madera County Local Hazard Mitigation Plan (MCLHMP) is to reduce or eliminate long-term risk to people and property from hazards in the three participating jurisdictions (cities of Chowchilla and Madera and the North Fork Rancheria of Mono Indians) (Madera County, 2017). In addition to the MCLHMP, the Project will be required to comply with City safety requirements adopted in Chapter 15.12 (Fire Prevention Code) and Section 2.28 (Emergency Response Plan) of the Chowchilla Municipal Code. These requirements will include the minimum emergency access requirements and fire suppression requirements. The emergency response plan is to provide protection to residents and assist with coordination in the event of a disaster within the City. The proposed Project does not include any characteristics (e.g., permanent road closures) that would physically impair or otherwise interfere with emergency response or evacuation in the Project vicinity.

Construction and operation of the proposed Project would not impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan. There would be no impact.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

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

The Project site is not within a Fire Severity Zone, and there are no wildland urban interface (WUI) areas within the City of Chowchilla or the vicinity of the Project site (CAL FIRE, 2026a). The proposed Project site is currently within the Local Responsibility Area (LRA) of the Madera County Fire Department (CAL FIRE, 2026b). LRAs indicate the local agency that is financially responsible for preventing and suppressing wildfires. Once the Project Site is annexed into City limits, the Project site would be within the LRA of the Chowchilla Volunteer Fire Department (CVFD). The Project would adhere to all applicable Fire Code and California Building Code requirements, which are intended to prevent the rapid spread of fire and allow for safer conditions for first responders fighting structure and wildland fires. The Project would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires. Therefore, there would be a less-than-significant impact.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

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

Would the Project:

a.	Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	☐	☒	☐	☐
b.	Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin?	☐	☒	☐	☐
c.	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would?				
i.	Result in substantial erosion or siltation on- or off-site;	☐	☒	☐	☐
ii.	Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	☐	☒	☐	☐
iii.	Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☒	☐	☐
iv.	Impede or redirect flood flows?	☐	☐	☒	☐
d.	In flood hazard, tsunami, or seiche zones, risk release of pollutants due to Project inundation?	☐	☐	☒	☐
e.	Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☒	☐	☐

In this section, the analysis focuses on the impacts associated with the Project site and related improvements. For the purposes of this analysis, the Annexation Only Area has no

new development or change in land use proposed, and this area is considered part of the baseline.

Discussion

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

Project construction would cause ground disturbance that could result in soil erosion or siltation and subsequent water quality degradation off-site, which is a potentially significant impact. Construction-related activities would also involve the use of materials such as vehicle fuels, lubricating fluids, solvents, and other materials that could result in polluted runoff, which is also a potentially significant impact. However, the potential consequences of any spill or release of these types of materials from construction are generally small due to the localized, short-term nature of such releases.

As required by the State's NPDES General Construction Stormwater Permit for stormwater discharges associated with construction and land disturbance activities, the Project proponent must develop and implement a SWPPP that specifies BMPs to prevent construction pollutants from contacting stormwater, with the intent of keeping all products of erosion from moving off-site. The Project proponent is required to comply with the Construction General Permit because Project-related construction activities result in soil disturbances of at least one acre of total land area. As discussed in Impact #3.4.7b Geology and Soils, MM GEO-1 requires the preparation and implementation of a SWPPP to comply with the Construction General Permit requirements.

With the implementation of Mitigation Measure GEO-1, the Project would not violate any water quality standards or waste discharge requirements (WDRs) during the construction period, and impacts would be less than significant.

MITIGATION MEASURE(S)

Implement MM GEO-1.

LEVEL OF SIGNIFICANCE

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

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

Although the Project would convert approximately 18 acres of pervious vacant field, the Project site includes pervious areas that will aid in groundwater recharging. This includes landscaping, Outlot A, which is designated for a retention pond and park, and Outlot C, which is designated as open space and recreational trail. To conserve water, the Project could

promote drought-resistant landscaping, the use of high-efficiency irrigation systems, and the installation of low-flow appliances.

According to the City's General Plan, there are no major system constraints for future development. Typically, if water service is requested by properties in the unincorporated territory and extension of service is feasible, the property will be required to annex to the City before services are provided. The City's Water Division, which is under the Public Works Department, provides safe, quality drinking water for customers and is monitored and regulated by several State of California regulatory agencies to guarantee compliance with Federal and State mandates. The Water Division would review the proposed subdivision (TTM 22-0011) and Project to determine whether the City has the capacity to serve the Project water, while maintaining compliance with the Chowchilla Basin Groundwater Sustainability Plan (GSP) and City of Chowchilla Urban Water Management Plan (UWMP). The City would review the addition of the two single-family homes included in the Annexation Only Area, which would likely have minimal demand on the City's water supply. Both the Project site and Annexation Only Area have a planned City of Chowchilla land use designation of HDR, which has been analyzed under the City's 2040 General Plan for high-density residential uses.

Mitigation Measure HYD-1 requires the developer/Project proponent to obtain a will-serve letter prior to building permit issuance, as this letter serves as confirmation that the City has the capacity to provide water to this Project. With mitigation implemented, the Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin.

MITIGATION MEASURE(S)

MM HYD-1: Prior to building permit issuance, the developer/Project proponent shall obtain a will-serve letter from the City's Water Division.

LEVEL OF SIGNIFICANCE

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

Impact #3.4.10c(i) – Would the Project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site?

As discussed in Impact #3.4.10b above, the Project site would add impervious surfaces. Nevertheless, stormwater drainage would be slowed by on-site landscaping, a retention pond, and open space features. Furthermore, there are no water courses on or in the vicinity of the Project site. As discussed in Impact #3.4.10a above, Project construction could cause erosion, which would be regulated and mitigated under the Project's SWPPP, as required by MM GEO-1. Therefore, with stormwater retention design features and mitigation

implemented, the Project would not 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.

MITIGATION MEASURE(S)

Implement MM GEO-1.

LEVEL OF SIGNIFICANCE

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

Impact #3.4.10c(ii) – Would the Project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

As discussed in Impact #3.4.10c(i) above, there are no water courses on or within the vicinity of the Project site, the Project's design features reduce the flow of stormwater, and MM GEO-1 requires the implementation of a SWPPP to reduce impacts to erosion. Furthermore, the Project would be required to obtain a will-serve letter from the City to demonstrate that the District's stormwater drainage system has capacity for the Project. This requirement has been incorporated as Mitigation Measure HYD-2. Therefore, with mitigation implemented, the Project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site.

MITIGATION MEASURE(S)

Implement MM GEO-1.

MM HYD-2: Prior to building permit issuance, the applicant/developer/Project proponent shall obtain a will-serve letter from the City's Stormwater Division.

LEVEL OF SIGNIFICANCE

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

Impact #3.4.10c(iii) – Would the Project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

As discussed in Impact #3.4.10b and c(i) above, with implementation of mitigation measures MM GEO-1 and MM HYD-2, the Project would have a less-than-significant impact on the capacity of the existing and planned stormwater drainage system. Therefore, with implementation of mitigation measures, impacts would be less than significant.

MITIGATION MEASURE(S)

Implement MM GEO-1 and MM HYD-2.

LEVEL OF SIGNIFICANCE

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

Impact #3.4.10c(iv) – Would the Project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows?

As discussed in Impact #3.4.10c(ii) and (iii) above, the Project site does not contain nor is it in the vicinity of watercourses. Impervious surfaces will be added as a result of this Project, but the Project has also incorporated design features that reduce the flow of stormwater. These features include landscaping, a retention pond, and open space. The Project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would impede or redirect flood flows. Therefore, the Project would be less than significant.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

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

The Project site is not located in a flood hazard zone, tsunami, or seiche zone. Therefore, any impacts would be less than significant.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

Impact #3.4.10e – Would the Project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

The City of Chowchilla has more than 3,000 water customers and is required by State Law to prepare an Urban Water Management Plan (UWMP) (City of Chowchilla, 2014). The UWMP utilizes population growth and land annexations from the 2040 General Plan. The Project site is within the Plan's SOI and was designated as High Density Residential (HDR). The Project is consistent with the HDR land uses and therefore would be consistent with the UWMP. Furthermore, Mitigation Measure HYD-1 requires the Project to obtain a will-serve letter from the City Water Division to verify the City has capacity for the Project. Thus, the Project will not conflict with or obstruct the implementation of a quality control plan or Sustainable Groundwater Management Plan; therefore, there would be less-than-significant impact.

MITIGATION MEASURE(S)

Implement MM HYD-1.

LEVEL OF SIGNIFICANCE

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

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

Would the Project:

- | | | | | | |
|----|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a. | Physically divide an established community? | ☐ | ☐ | ☐ | ☒ |
| b. | Cause a significant environmental impact due to a conflict with any land use plan, policy or regulation adopted for the purpose of avoiding or mitigating an environmental effect? | ☐ | ☐ | ☐ | ☒ |

Even though the Annexation Only Area and Project site will be zoned with an R-H City zone classification, this would not affect the current residential and agricultural uses on these parcels. For the purposes of this analysis, the Annexation Only Area has no new development or change in land use proposed.

Discussion

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

The Project site is currently an undeveloped field and is zoned RRS within the County of Madera. The Project site is located in an unincorporated area of southwest Madera County, directly adjacent to the southwest limits of the City of Chowchilla and within the City's Planning Area and SOI. The entire 18.24-acre parcel would be annexed into the City of Chowchilla and pre-zoned to R-H, consistent with the City's HDR land use designation. The Project site will construct an internal road that connects the existing Lincoln Avenue on the north Project boundary to the existing Road 15 on the west Project boundary. Primary access to the duplexes will be from Lincoln Avenue and internal circulation roads, and primary access to the apartments will be from Road 15.

The Project will develop a total of 188 multi-family housing units on a parcel that is planned for high-density residential uses, directly adjacent to the City limits. The Project will not be physically dividing an established community; therefore, there is no impact.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

There would be *no impact*.

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

As discussed in Impact #3.4.11a above, the Project proposes to construct a total of 188 multi-family units on a parcel that is planned for High-Density Residential development in the City's 2040 General Plan land use designation of HDR, and is a consistent use with the pre-zone designation of R-H. The Project will not cause a significant impact due to a conflict with a land use plan, policy, or regulation. Therefore, there would be no impact.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

There would be *no impact*.

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

Would the Project:

- | | | | | | |
|----|---|--------------------------|--------------------------|-------------------------------------|-------------------------------------|
| a. | Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State? | ☐ | ☐ | ☒ | ☐ |
| b. | Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan? | ☐ | ☐ | ☐ | ☒ |

In this section, the analysis focuses on the impacts associated with the Project site and related improvements. For the purposes of this analysis, the Annexation Only Area has no new development or change in land use proposed, and this area is considered part of the baseline.

Discussion

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

The City of Chowchilla and the surrounding area are designated as a Mineral Resources Zone 1 (MRZ-1) by the State Mining and Geology Board (SMGB). MRZ-1 are areas where adequate information indicates that no significant mineral deposits are present, or where it is judged that little likelihood exists for their presence (City of Chowchilla, 2014). Additionally, per the California Geothermal Energy Management Division (CalGEM), there are no active, inactive, or capped oil wells located within the Project site, and it is not in the vicinity of an oilfield (California Department of Conservation, 2026d). Since no appreciable mineral resources occur at or below the Project site, the proposed Project would not preclude access to the subterranean mineral resources that would result in the loss of availability to mineral resources. The Project would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State, and would therefore be considered less than significant.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

Impact #3.4.12b – Would the Project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

According to the Chowchilla General Plan, the City or surrounding area does not contain commercial mining or mineral extraction activities. Additionally, the General Plan does not designate the site for mineral and petroleum resources activities. The Project site will be pre-zoned for High-Density Residential land use, which is consistent with the General Plan. No mining occurs in the Project area or in the nearby vicinity, and there are no anticipated mineral extraction activities to be conducted in the future as a result of the Project. The Project would not result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan and would therefore have no impact.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

There would be *no impact*.

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

Would the Project result in:

- | | | | | | |
|----|--|--------------------------|-------------------------------------|-------------------------------------|--------------------------|
| a. | Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? | ☐ | ☒ | ☐ | ☐ |
| b. | Generation of excessive groundborne vibration or groundborne noise levels? | ☐ | ☒ | ☐ | ☐ |
| c. | For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project expose people residing or working in the Project area to excessive noise levels? | ☐ | ☐ | ☒ | ☐ |

Discussion

In this section, the analysis focuses on the impacts associated with the Project site and related improvements. For the purposes of this analysis, the Annexation Only Area has no new development or change in land use proposed, and this area is considered part of the baseline.

The discussion below is substantiated by an Acoustical Analysis prepared for this Project (WJV Acoustics, Inc., 2026), attached as Appendix E.

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

Construction

Project construction would generate temporary increases in noise levels during the construction period. The City currently does not have a Noise Ordinance that regulates construction activities or establishes thresholds of construction noise. However, General Plan Policy N 1.13 requires all development projects to mitigate noise impacts associated with construction activities, and Policy N 4.6 limits construction to the hours of 7:00 a.m. to

7:00 p.m., Monday through Saturday. For residential land uses, the Noise Element establishes a land use compatibility criterion of 60 dB CNEL as “Normally Acceptable” and a noise exposure level of 60-65 dB CNEL as “Conditionally Acceptable”. For some multi-family residential land uses, a noise exposure of up to 70 dB CNEL is considered “Conditionally Acceptable”. The Noise Element also requires that interior noise levels attributable to exterior noise sources do not exceed 45 dB CNEL.

As a point of reference, Table 3.4.13-1 provides typical construction-related noise levels at distances of 50 feet, 100 feet, and 300 feet. Construction activities would be temporary in nature and would most likely occur only during the daytime hours. Construction noise impacts could result in annoyance or sleep disruption for nearby residents if nighttime operations were to occur or if equipment is not properly muffled or maintained.

Table 3.4.13-1
Typical Construction Equipment Maximum Noise Levels, dBA

Type of Equipment	50 ft.	100 ft.	300 ft.
Backhoe	78	72	62
Concrete Saw	90	84	74
Crane	81	75	65
Excavator	81	75	65
Front End Loader	79	73	63
Jackhammer	89	83	73
Paver	77	71	61
Pneumatic Tools	85	79	69
Dozer	82	76	66
Rollers	80	74	64
Trucks	86	80	70
Pumps	80	74	64
Scrapers	87	81	71
Portable Generators	80	74	64
Grader	86	80	70

Source: (QK, 2025)

The closest residence would be approximately 20 to 30 feet from the Project site construction area. Even though construction activities have the potential to exceed the exterior noise level, construction noise will be temporary in nature and will be required to work during daytime hours. Furthermore, Mitigation Measure NSE-1 requires multiple noise reduction methods related to Project construction equipment in order to reduce noise from stationary construction equipment, such as staging requirements, equipment mufflers, and baffles, and compliance with the construction hours within the City’s Noise Element, whenever feasible. Therefore, construction-related noise would be less than significant with mitigation implemented.

Operation (post-construction)**EXTERIOR NOISE**

The traffic noise exposure at the Project site, adjacent to Robertson Boulevard, would be approximately 63 dB CNEL for existing conditions and approximately 64 dB CNEL for future (2046) traffic conditions, at the closest proposed residential buildings to the roadway. Traffic noise exposure at the Project site, adjacent to Road 15, would be approximately 46 dB CNEL for future (2046) traffic conditions, at the closest proposed residential buildings to the roadway. The exterior noise standard of 60 dB CNEL applies to the outdoor activity areas. The site plan indicates that there would be a common-use swimming pool and tot lot area located along the Robertson Boulevard Project frontage. The Project would include a six-foot concrete masonry wall along the entirety of the Project perimeter. The calculations indicate that a sound wall along Robertson Boulevard, constructed to a minimum height of six feet relative to the Project site elevations, would reduce traffic noise exposure by approximately five dB. This would result in exterior noise levels of approximately 59 dB CNEL at the closest proposed residential buildings to Robertson Boulevard and would reduce noise levels within the common use pool and tot lot areas to below the City's 60 dB CNEL exterior noise level standard.

The Project would also include balconies for individual second-floor units. The sound wall would attenuate noise at first-floor patio locations only and would not attenuate noise from second-floor balconies facing Robertson Boulevard. The U.S. Department of Housing and Urban Development (HUD) provides guidance on exterior noise levels for balconies in high-noise-exposure areas. HUD considers balconies to not be required for the full functioning of dwelling units and are ancillary to the principal use (housing). Based upon this guidance provided by HUD, noise exposure levels within individual unit balconies are not considered to be a significant impact with respect to outdoor noise exposure levels.

INTERIOR NOISE

Policy N 3.5 requires the City to work with Caltrans to mitigate noise impacts on sensitive receptors near SRs 99, 156, and 233, and other key State roadways by requiring noise buffering or insulation in new construction. Residential construction methods complying with current building code requirements will reduce exterior noise levels by approximately 25 dB if windows and doors are closed. This will be sufficient for compliance with the City's 45 dB CNEL interior standard. Heating, ventilation, and air conditioning (HVAC) units are proposed to be constructed in each unit.

Furthermore, the operational noise of the proposed Project would be similar in nature to the surrounding existing residential uses. Project operational noise would not be greater than the baseline condition, would follow the objectives of the Noise Element to minimize noise levels, and adherence to construction design standards, such as a sound wall and HVAC systems, would result in ambient noise levels in the vicinity of the Project to be less than the applicable standards of the Noise Element and other agencies. Therefore, there would be a less-than-significant impact.

MITIGATION MEASURE(S)

MM NSE-1: Whenever feasible, the construction contractor shall:

- a. Place all stationary construction equipment so that emitted noise is directed away from sensitive receptors, including the existing residences on Road 15, and those located at the northeast corner of the Project site. This includes noise-generating equipment such as portable generators, etc.
- b. The construction contractor shall locate equipment staging in areas that will create the greatest possible distance between construction-related noise sources and noise-sensitive receptors nearest the Project site during all Project construction.
- c. The construction contractor shall ensure that all construction equipment is equipped with manufacturer-approved mufflers and baffles.
- d. Project construction hours shall comply with City Noise Element Policy N 4.6: The City of Chowchilla shall limit construction activities to the hours of 7:00 a.m. to 7:00 p.m., Monday through Saturday. No construction shall occur on Sundays or national holidays without a permit from the City.

LEVEL OF SIGNIFICANCE

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

Impact #3.4.13b – Would the Project result in generation of excessive groundborne vibration or groundborne noise levels?

Construction

Construction activities, in general, can have the potential to create groundborne vibrations. The City of Chowchilla does not have regulations that define acceptable levels of vibration. One of the most recent references suggesting vibration guidelines is the California Department of Transportation (Caltrans) Transportation and Construction Vibration Guidance Manual (WJV Acoustics, Inc., 2026). The Guidance Manual provides specific vibrational thresholds at which specific structural types may be damaged; these are displayed in Table 3.4.13-2 below.

Table 3.4.13-2
Guideline Vibration Damage Potential Threshold Criteria

Structure and Condition	Maximum PPV (in/sec)	
	Transient Sources	Continuous/Frequent Intermittent Sources
Extremely fragile, historic buildings, ancient monuments	0.12	0.08
Fragile buildings	0.2	0.11
Historic and some old buildings	0.5	0.25
Older residential structures	0.5	0.3
New residential structures	1.0	0.5
Modern industrial/commercial buildings	2.0	0.5

Source: Appendix E

The typical vibration produced by construction equipment is illustrated in Table 3.4.13-3. Jackhammers or pile driving would not be required in connection with the construction of this Project.

Table 3.4.13-3
Typical Vibration Levels for Construction Equipment

Equipment	Reference peak particle velocity at 25 feet (inches/second) ¹	Approximate peak particle velocity at 100 feet (inches/second) ²
Large bulldozer	0.089	0.011
Loaded trucks	0.076	0.010
Small bulldozer	0.003	0.0004
Vibratory compactor/roller	0.210	0.026

Notes:

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

2 – Calculated using the following formula:

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

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

The construction equipment that would be utilized for this Project is under the damage potential threshold criteria displayed in Table 3.4.13-2 above. With implementation of MM NSE-1, the vibrations from the Project's construction activities would be less than significant.

Operation (post-construction)

After the full Project build out, it is not expected that ongoing Project operational activities will result in any vibration impacts at nearby sensitive uses. Activities involved in trash bin collection could result in minor on-site vibrations as the bin is placed back onto the ground. Such vibrations would not be expected to be felt at the closest off-site sensitive uses.

Therefore, the potential for groundborne vibration impacts during the construction of the Project is considered less than significant. Once operational, the Project would not have any activities that would create groundborne vibrations. The proposed Project would not result in the exposure of people to or generation of excessive groundborne vibration or groundborne noise levels.

MITIGATION MEASURE(S)

Implement MM NSE-1.

LEVEL OF SIGNIFICANCE

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

Impact #3.4.13c – For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project expose people residing or working in the Project area to excessive noise levels?

As discussed in Impact #3.4.9e, the Chowchilla Municipal Airport is located approximately 1.50 miles northeast of the proposed Project site. The Project site is not located within the Runway Protection Zone, Airport Influence Area, or a Compatibility Zone. It is also outside of the noise hazard zones (60-65 dB CNEL) (Madera County, 2015). The Project would not expose people residing or working within the Project area to excessive noise levels. Therefore, any impacts would be less than significant.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

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

Would the Project:

- | | | | | |
|---|--------------------------|--------------------------|-------------------------------------|-------------------------------------|
| a. Induce substantial population unplanned growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)? | ☐ | ☐ | ☒ | ☐ |
| b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere? | ☐ | ☐ | ☐ | ☒ |

Discussion

Even though the Annexation Only Area and the Project site will be zoned with an R-H City zone classification, this would not affect the current residential and agricultural uses on these parcels. For the purposes of this analysis, the Annexation Only Area has no new development or change in land use proposed.

Impact #3.4.14a – Would the Project induce substantial population unplanned 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)?

The Project site is currently an undeveloped field and is zoned RRS within the County of Madera. The Project site is located in an unincorporated area of southwest Madera County, directly adjacent to the southwest limits of the City of Chowchilla and within the City's Planning Area and SOI. The entire 18.24-acre parcel would be annexed into the City of Chowchilla and pre-zoned to R-H, consistent with the City's 2040 General Plan land use designation of HDR.

The Project proposes the development of a total of 188 multi-family units (17 duplexes and 154 apartment units). Pursuant to the City's 2024-2032 Housing Element, Chowchilla has 3.53 persons per household. Therefore, the Project would result in a maximum total of approximately 664 people. The Project is consistent with the planned land use designation; therefore, the population growth anticipated by this Project is accounted for in both the 2040 General Plan and the Housing Element. Therefore, the Project would not result in Project-induced substantial population unplanned 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).

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

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

The Project site is currently a vacant field that was previously used for agriculture. The only existing structure is a warehouse building that was previously used as an auto shop, which will be demolished prior to construction, consistent with all local, State, and federal requirements. The Project will not alter or remove the existing single-family homes located in the Annexation Only Area. The Project would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere, and therefore, there would be no impact.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

There would be *no impact*.

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

Would the Project:

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

i. Fire protection?	☐	☐	☒	☐
ii. Police protection?	☐	☐	☒	☐
iii. Schools?	☐	☐	☒	☐
iv. Parks?	☐	☐	☒	☐
v. Other public facilities?	☐	☐	☒	☐

Discussion

In this section, the analysis focuses on the impacts associated with the Project site and related improvements. For the purposes of this analysis, the Annexation Only Area has no new development or change in land use proposed, and this area is considered part of the baseline.

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

Fire suppression support is provided by the City of Chowchilla Volunteer Fire Department (CVFD). The CVFD has one station located on the south portion of the Chowchilla Corporation Yard site, approximately 1.5 miles northeast of the Project site. CVFD is financially supported through general fund revenue, grant funding and philanthropic donations. The Project would be required to pay development impact fees to the City, which

are designated for fire facilities, equipment, and training for the City (Chapter 17.76). Construction and operational activities would be in accordance with City and State fire codes. As discussed in Impact #3.4.14a Population and Housing, the Project would result in planned population growth that was anticipated in the City's 2040 General Plan. Furthermore, Municipal Code 17.20.090 requires that upon receipt of a filed copy of such tentative map, each review agency, including the Fire Department, shall examine the map to ascertain if the subdivision proposed thereon conforms to the requirements coming within the authority scope of that agency. Therefore, any impacts to fire protection services would be less than significant.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

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

Law enforcement and public protection are provided by the City of Chowchilla Police Department. The City's police station is located on Trinity Avenue between South 2nd Street and South 1st Street. The station is located approximately 1.4 miles to the northeast of the Project site. As discussed in Impact #3.4.14a Population and Housing and Impact #3.4.15a(i) above, the Project would result in planned population growth, be subject to Police Department review, and contribute to development impact funds that are designated for law enforcement facilities, equipment, and training. Therefore, any impacts to police protection services would be less than significant.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

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

Public education facilities and services in the City of Chowchilla and the surrounding area are provided by the Chowchilla Elementary School District (CESD) for primary (grades K-6) and intermediate (grades 7 and 8) education levels, and by the Chowchilla Union High School District (CUHSD) for secondary education (grades 9-12). The following public schools are listed below with their respective distance from the Project site:

- Wilson Elementary School is approximately 0.75 miles northeast.
- Merle Fuller Elementary School is approximately 0.81 miles northeast.
- Chowchilla High School is approximately 0.83 miles northeast.
- Stephen's Elementary School is approximately 1.25 miles northeast.
- Ronald Reagan Elementary School is approximately 2.50 miles northeast.

As discussed in Impact #3.4.14a Population and Housing, Impact #3.4.15a(i) and (ii) above, the Project would result in anticipated population growth from the buildout of the City's 2040 General Plan. Furthermore, the Project would be required to pay school developer fees pursuant to Government Code Section 65995 and California Education Code Section 17620 to offset any increased demand on existing school services. Therefore, impacts to local schools would be less than significant.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

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

The closest park to the Project site is Edward Ray Park, located 0.58 acres north. The City standard for developed parkland is five acres per 1,000 residents (City of Chowchilla, 2014). This is equivalent to 0.005 acres per resident. As discussed in Impact #3.4.14a Population and Housing, the Project would result in a maximum total of approximately 664 people. Therefore, the Project would be responsible for 3.32 acres of parkland.

The Project proposes the development of Outlot A, for a retention pond and park, Outlot B for a trail, and Outlot C for open space and a trail. The Project would pay park and recreation fees (Chapter 17.42) to offset the planned increase in population. Therefore, the Project would have a less than significant impact on existing parks.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

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

Community facilities are the network of public and private institutions that support the civic, social, and health needs of the population. They offer a variety of recreational, artistic, and educational programs and special events. The closest library is the Chowchilla Branch Library (Madera County Library), located approximately 1.40 miles northeast of the Project site. The nearest healthcare centers (Family Health Services and Chowchilla Family Clinic) are located approximately 1 mile north of the Project site. The nearest hospitals are Dignity Health – Mercy Medical Center, located approximately 18 miles northwest, and Madera Community Hospital, located approximately 17 miles southeast.

As discussed in Impact #3.4.14a Population and Housing, and Impact #3.4.15a(i) through (iv) above, the Project proposes to develop in areas where planned high-density residential growth is anticipated in the General Plan. Development fees will be paid to offset the increased demand for public services including, Fire facilities, equipment and training, general facilities and equipment necessary for the administration of the city, law enforcement facilities, equipment and training, public works facilities and equipment, recreation facilities, sewage collection facilities, sewage treatment facilities, streets and thoroughfares, storm drainage facilities, traffic control facilities, water distribution facilities and water supply well facilities.

The proposed Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the need for new or physically altered governmental facilities, the construction of which could cause a significant environmental impact, in order to maintain acceptable service ratios for any of the public services beyond what was previously approved. Therefore, the Project would have a less-than-significant impact.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than- Significant Impact	No Impact
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3.4.16 - RECREATION

Would the Project:

- | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a. Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated? | ☐ | ☐ | ☒ | ☐ |
| b. Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment? | ☐ | ☐ | ☒ | ☐ |

Discussion

In this section, the analysis focuses on the impacts associated with the Project site and related improvements. For the purposes of this analysis, the Annexation Only Area has no new development or change in land use proposed, and this area is considered part of the baseline.

Impact #3.4.16a – Would the Project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

As discussed in Impact #3.4.15a(iv) Public Services, the Project would generate 664 persons, which would require 3.32 acres of parkland per City standards. The Project proposes to develop Outlots A, B, and C with a retention pond, park, open space, and trail in accordance with City standards. Furthermore, the Project would pay park and recreation fees (Chapter 17.42) to further offset the increased demand from the planned population growth. Therefore, the Project would have a less-than-significant impact on existing parks.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

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

As previously mentioned in Impact #3.4.16b above, the Project proposes to develop Outlots A, B, and C with a retention pond, park, open space, and trail in accordance with City standards. The proposed recreational features are proposed in order to comply with City parkland standards and would not have an adverse effect on the environment. Therefore, impacts would be less than significant.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

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

Would the Project:

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

Discussion

The primary focus of the analysis is on the impacts associated with the Project site and related improvements. For the purposes of this analysis, the Annexation Only Area has no new development or change in land use, although the property will be rezoned for residential use consistent with the General Plan. However, it is assumed the Annexation Only Area residents already utilize nearby roadways and would be considered part of the baseline.

The analysis in this section is substantiated by an Air Quality and Greenhouse Gas Analysis (LSA, 2026), and a Project-specific Traffic Impact Study (TIS), which are included as Appendix B and Appendix F (LSA, 2025b), respectively. The TIS prepared for this Project analyzed for 34 duplex units and 160 apartment units, which is six more units than the Project may ultimately construct. Therefore, conclusions are considered a conservative analysis that is greater than the actual Project impact.

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

Bicycle Network

The City of Chowchilla encourages bicycling and walking for recreation and mobility. To facilitate and encourage bicycle trips among other non-motorized modes of travel, the Madera County Active Transportation Plan (ATP) includes a trails system linking residential areas, schools, parks, and commercial and employment centers so that residents can travel within the community without driving. According to the ATP, the bikeway network within the City is classified into four categories: Class I, Class II, Class III, and Class IV.

Class I bikeways are paths/trails that provide a separate right-of-way and are designated for the exclusive use of bicycles and pedestrians with minimal cross-flow traffic. Class II bikeways are paths that provide a designated striped lane for bicyclists, adjacent to the other vehicle travel lanes. Class III bikeways are paths that provide enhanced mixed-traffic conditions for bicyclists through signage, striping, and/or traffic calming treatments, and provide continuity to a bikeway network. Class IV bikeways, also referred to as separated bikeways, are protected bikeways for the exclusive use of bicycles, which are physically separated from vehicle traffic. Within the Project study area, there are Class III bike routes along Robertson Boulevard, 15th Street, and a Class II bike route along Washington Road.

Pedestrian Network

The implementation of enhanced pedestrian linkage with a comprehensive trails system links residential areas, schools, parks, and commercial centers so that residents can travel within the community without driving. Safe, attractive sidewalks and walkways improve walkability in urban areas. Typically, sidewalks are provided on both sides of streets in urban areas. Additionally, both paved and unpaved trails are frequently used by bicyclists and pedestrians in the region. The existence of trails and sidewalks provides accessible facilities, enhances safety, and improves walkability in the study areas. Currently, the Project site has limited pedestrian access because there are no continuous sidewalks in the vicinity of or adjacent to the Project site. However, within the study area, continuous sidewalks are present in downtown/core urban areas of Chowchilla. Within Chowchilla, continuous sidewalks exist in the Robertson Boulevard corridor to Myer Drive and along Washington Road, 15th Street, and 11th Street.

Transit Network

Chowchilla Area Transit (CATX) is the Transportation Service Agency within the City and is responsible for coordinating transit services within its service area. CATX is a local curb-to-curb, on-demand bus transit. CATX allows passengers to travel conveniently, by providing scheduling services for work, medical appointments, school, and shopping within City limits. In addition, Madera County Connection (MCC) provides five trips each Monday through Friday from Downtown Madera to Chowchilla.

Roadway Network

The following summarizes the classifications of major roadways within the study area:

- **Robertson Boulevard (SR-99):** Within the study area, Robertson Boulevard is designated as a Major Collector in the Chowchilla General Plan from 15th Street to Palm Parkway. Robertson Boulevard is designated as an Arterial from Palm Parkway to the City's Limits. Robertson Boulevard is a conventional four-lane highway with a center two-way left-turn (TWLT) lane from 11th Street to Myer Drive. From Myer Drive, Robertson Boulevard is a two-lane, undivided roadway within the study area. There is a Class III bike lane in this segment. Robertson Boulevard does not have designated on-street parking in either direction along this segment.
- **11th Street:** Within the study area, 11th Street is designated as a Local street in the Chowchilla General Plan. 11th Street is mostly a two-lane, undivided roadway within the study area. There is a Class III bike lane in this segment. There is no designated on-street parking along either direction of this segment.
- **15th Street:** Within the study area, 15th Street is designated as a Minor Collector on the west and Major Collector on the east in the Chowchilla General Plan. 15th Street is mostly a two-lane, undivided roadway within the study area. There are no bike facilities or designated on-street parking along either direction of this segment.
- **Washington Road:** Within the study area, Washington Road is designated as a Major Collector in the Chowchilla General Plan. Washington Road is mostly a two-lane, undivided roadway within the study area. There is a Class II bike lane in this segment. There is no designated on-street parking along either direction of this segment.
- **Adams Drive:** Within the study area, Adams Drive is designated as a Local street in the Chowchilla General Plan. Adams Drive is mostly a two-lane, undivided roadway within the study area. There are no bike facilities or designated on-street parking along either direction of this segment.
- **Palm Parkway:** Within the study area, Palm Parkway is designated as a Minor Collector in the Chowchilla General Plan. Palm Parkway is mostly a two-lane, undivided roadway within the study area. There are no bike facilities or designated on-street parking along either direction of this segment.
- **Avenue 24 ½:** Within the study area, Avenue 24 ½ is designated as a Local street in the Chowchilla General Plan. Avenue 24 ½ is mostly a two-lane, undivided roadway within the study area. There are no bike facilities or designated on-street parking along either direction of this segment.
- **Road 15:** Within the study area, Road 15 is designated as a Local street. Road 15 is mostly a two-lane, undivided roadway within the study area. There are no bike facilities or designated on-street parking along either direction of this segment.
- **Avenue 24:** Within the study area, Avenue 24 is designated as a Local street. Avenue 24 is mostly a two-lane, undivided roadway within the study area. There are no bike facilities or designated on-street parking along either direction of this segment.

Project Traffic Analysis

Study intersections analyzed in the referenced Traffic Impact Analysis were performed under the jurisdiction of Caltrans, City of Chowchilla, and Madera County. Per the Circulation Element of the City of Chowchilla General Plan (2040), the City's goal is to maintain LOS C or better, with instances of LOS D in the peak hour. The County of Madera uses LOS D as the minimum LOS criteria for all State and County roadways. LOS D was considered the LOS standard for State routes and freeway ramps within the district jurisdiction. Caltrans does not have any operational deficiency criteria for study intersections.

The following intersections were studied:

- Road 15/Robertson Boulevard (Caltrans)
- Adams Drive/Robertson Boulevard (Caltrans)
- 15th Street/Robertson Boulevard (Caltrans)
- 11th Street/Robertson Boulevard (Caltrans)
- Palm Parkway/Robertson Boulevard (Caltrans)
- Road 15/Project Driveway 1 (City/County)
- Road 15/Project Driveway 2 (City/County)

Trip distribution percentages were developed based on the location of the proposed Project in relation to surrounding land uses, the Project operational statement, the regional roadway network, and existing traffic volumes. The trip generation for the proposed Project was developed using rates from the ITE *Trip Generation Manual* (11th Edition) for Land Use 215 – “Single-Family Attached Housing” and Land Use 220 – “Multi-family”. Table 3.4.17-1 summarizes the Project trip generation.

**Table 3.4.17-1
Project Trip Generation Estimate**

Land Use	Size	Unit	Daily	A.M. Peak Hour			PM Peak Hour		
				In	Out	Total	In	Out	Total
Trip Rates ¹									
Multi-family Low-Rise		Du	6.74	0.10	0.30	0.40	0.32	0.19	0.51
Single-Family Attached		Du	7.20	0.15	0.33	0.48	0.32	0.25	0.57
Project Trip Generation									
Multi-family Low-Rise	160	Du	1,078	16	48	64	51	30	81
Single-Family Attached	34	Du	245	5	11	16	11	9	20
TOTAL			1,323	21	59	80	62	39	101

1 – Trip rates from the Institute of Transportation Engineers (ITE) *Trip Generation Manual*, 11th Edition (2021).

Land Use Code 220 – Multi-family Housing (Low Rise) - 2 or 3 Levels

Land Use Code 215 - Single-Family Attached Housing

du = dwelling unit

As shown in Table 3.4.17-1, the proposed Project is anticipated to generate 1,323 daily trips, with 80 trips during the a.m. peak hour and 101 trips during the p.m. peak hour.

Existing and Plus Project Conditions

An intersection LOS analysis was conducted for existing conditions and the plus Project conditions. Table 3.4.17-2 summarizes the results of this analysis.

Table 3.4.17-2 above shows that all study intersections currently operate at a satisfactory LOS under existing conditions. However, Table 3.4.17-2 also demonstrates that the Robertson Boulevard/Washington Road intersection is forecast to operate at a deficient LOS of E, with the Project build-out conditions included.

Table 3.4.17-2
Existing and Plus Project Intersection Levels of Service

Intersection	Jurisdiction	LOS Standard	Control	Without Project		Plus Project		A.M. Peak		P.M. Peak	
				A.M. Peak Hour	P.M. Peak Hour	A.M. Peak Hour	P.M. Peak Hour	Delay (sec.)	LOS	Delay (sec.)	LOS
Robertson Boulevard/11 th Street	Caltrans	D	S	14.8	B	10.9	B	15.0	B	11.0	B
Robertson Boulevard/15 th Street	Caltrans	D	S	17.2	B	14.7	B	17.5	B	14.7	B
Robertson Boulevard/Washington Road	Caltrans	D	TWSC	32.6	D	31.4	D	38.5	E*	37.1	E*
Robertson Boulevard/Country Wood Shopping Center - Adams Drive	Caltrans	D	TWSC	17.3	C	16.4	C	18.6	C	17.5	C
Robertson Boulevard/Myer Drive – Anderson Pump Company	Caltrans	D	TWSC	17.9	C	12.9	B	20.3	C	13.7	B
Robertson Boulevard/Palm Parkway	Caltrans	D	OWSC	11.1	B	10.7	B	11.6	B	11.0	B
Robertson Boulevard/Avenue 24 ½	Caltrans	D	OWSC	12.0	B	11.7	B	12.6	B	12.3	B
Robertson Boulevard/Road 15	Caltrans	D	OWSC	9.7	A	10.0	B	10.3	B	10.7	B
Road 15/Avenue 24	MC	D	TWSC	8.7	A	8.8	A	8.7	A	8.9	A
Project Driveway 1/Road 15	MC/CC	D	OWSC	Future Intersection	Future Intersection	8.6	A	8.5	A		
Project Driveway 2/Road 15	MC/CC	D	OWSC	Future Intersection	Future Intersection	8.6	A	8.6	A		

MC = Madera County, CC = City of Chowchilla, S= Signal, AWSC = All-Way Stop Control, OWSC = One-Way Stop Control, TWSC = Two-Way Stop Control, LOS = Level of Service

Delay = Average control delay in seconds (For OWSC/TWSC intersections, reported delay is for worst-case movement). * Exceeds LOS Standard

BUILD-OUT LOS CONDITIONS

Build-out condition traffic volumes will be developed using the growth forecasts from the Madera County Transportation Commission (MCTC) Travel Demand Model (MCTDM). The methodology used to develop build-out traffic volumes at all study intersections is consistent with the National Cooperative Highway Research Program (NCHRP) and MCTC procedures for post-processing of modeled traffic volumes. Table 3.4.17-3 illustrates the peak-hour traffic volumes at study intersections under build-out conditions.

Table 3.4.17-3 demonstrates that the Robertson Boulevard/Washington Road will reach a deficient LOS without the addition of the Project.

IMPROVED CONDITIONS

For the intersection of Robertson Boulevard/Washington Road, converting the existing two-way stop control (TWSC) to a traffic signal is proposed to eliminate the forecasted operational deficiency under existing and build-out conditions. The City's *Citywide Development Impact Fee Study Final Report*, dated May 11, 2022, has the primary objective to support and fund improvements to public facilities and the purchase of equipment related to the provision of essential services based on demands created by new growth. As new development occurs in Chowchilla, the growth will lead to a continuous increase in service demand. The fee program will enable the City to continue to provide services at an increased rate based on growth. The study analyzes the impact of new developments on specific types of facilities such as parkland and improvements, fire protection facilities, police facilities, street improvements, traffic signals, public buildings, community and recreation centers, storm drainage improvements, water system, and sewer system. The installation of a traffic signal at the intersection of Robertson Boulevard/Washington Road (conversion from the existing TWSC) is included in the City's development impact fee (DIF) program. Mitigation Measure TRA-1 requires that the applicant pay development impact fees that are proportional to the Project's share of impact on this intersection, as determined by the City's DIF program.

Table 3.4.17-4 summarizes the post-improvement intersection LOS under build-out conditions.

**Table 3.4.17-3
Build-Out Intersection Level of Service**

Intersection	Jurisdiction	LOS Standard	Control	Without Project		Plus Project		A.M. Peak Hour Delay (sec.)	LOS	P.M. Peak Hour Delay (sec.)	LOS
				A.M. Peak Hour Delay (sec.)	LOS	P.M. Peak Hour Delay (sec.)	LOS				
Robertson Boulevard/11 th Street	Caltrans	D	S	14.6	B	12.2	B	15.0	B	11.0	B
Robertson Boulevard/15 th Street	Caltrans	D	S	16.7	B	16.5	C	17.5	B	14.7	B
Robertson Boulevard/Washington Road	Caltrans	D	TWSC	106.3	F*	>200	F	38.5	F*	37.1	F*
Robertson Boulevard/Country Wood Shopping Center - Adams Drive	Caltrans	D	TWSC	17.8	C	23.0	C	18.6	C	17.5	D
Robertson Boulevard/Myer Drive – Anderson Pump Company	Caltrans	D	TWSC	16.3	C	14.6	B	20.3	C	13.7	C
Robertson Boulevard/Palm Parkway	Caltrans	D	OWSC	11.4	B	11.7	B	11.6	B	11.0	B
Robertson Boulevard/Avenue 24 ½	Caltrans	D	OWSC	12.8	B	14.4	B	12.6	B	12.3	C
Robertson Boulevard/Road 15	Caltrans	D	OWSC	9.8	A	10.6	B	10.3	B	10.7	B
Road 15/Avenue 24	MC	D	TWSC	8.6	A	8.7	A	8.7	A	8.9	A
Project Driveway 1/Road 15	MC/CC	D	OWSC	Future Intersection		Future Intersection		8.6	A	8.5	A
Project Driveway 2/Road 15	MC/CC	D	OWSC	Future Intersection		Future Intersection		8.6	A	8.6	A

MC = Madera County, CC = City of Chowchilla, S= Signal, AWSC = All-Way Stop Control, OWSC = One-Way Stop Control, TWSC = Two-Way Stop Control, LOS = Level of Service, Delay = Average control delay in seconds (For OWSC/TWSC intersections, reported delay is for worst-case movement). * Exceeds LOS Standard

**Table 3.4.17-4
Improved Intersection Level of Service**

Intersection	Jurisdiction	LOS Standard	Control	Without Project				Plus Project				
				A.M. Peak		P.M. Peak		A.M. Peak Hour		P.M. Peak		
				Hour		Hour		Hour		Hour		
				Delay (sec)	LOS	Delay (sec)	LOS	Control	Delay (sec.)	LOS	Delay (sec.)	LOS
Robertson Boulevard/Washington Road	Caltrans	D	TWSC	133.0	F*	>200	F*	S	9.9	A	10.4	B

MC = Madera County, CC = City of Chowchilla, S= Signal, AWSC = All-Way Stop Control, OWSC = One-Way Stop Control, TWSC = Two-Way Stop Control, LOS = Level of Service, Delay = Average control delay in seconds (For OWSC/TWSC intersections, reported delay is for worst-case movement). * Exceeds LOS Standard

Conclusion

Therefore, with the implementation of TRA-1, the Project would be responsible for paying its proportional pro-rata fair share of improvements to the Robertson Boulevard/Washington Road intersection to fund future improvements that would reduce the LOS for this intersection to a less-than-significant level.

MITIGATION MEASURE(S)

MM TRA-1: Prior to Certificate of Occupancy being issued, the Project Proponent shall pay its fair share, as determined by the City's Development DIF program, for the cost of improvements to the Robertsons Boulevard/SR 233 intersection.

LEVEL OF SIGNIFICANCE

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

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

To achieve a reduction in Project-generated VMT below the regional average, consistent with the current version of the California Climate Change Scoping Plan (currently 15 percent) or meet a locally adopted SB 743 VMT target, reflecting the recommendations provided in the Governor's Office of Planning and Research's *Technical Advisory on Evaluating Transportation Impacts in CEQA* a residential project shall be 15 percent below the existing VMT per capita (LSA, 2026). Development that does not result in a net increase in existing VMT would be considered to have a less-than-significant GHG emission impact from transportation sources or should meet a locally adopted SB 743 VMT target.

As discussed in Impact #3.4.8a Greenhouse Gas Emissions, the City of Chowchilla's VMT per capita threshold is 8.5. According to the VMT Analysis prepared for the proposed Project, the Project's VMT per capita is 7.8. Therefore, the proposed Project does not constitute a significant VMT impact. As such, the Project would be consistent with CEQA Guidelines Section 15064.3 subdivision (b).

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

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

As discussed in Impact #3.4.11(a) Land Use and Planning, the Project will construct an internal road that connects the existing Lincoln Avenue on the north Project boundary to the existing Road 15 on the west Project boundary. Primary access to the duplexes will be from Lincoln Avenue and internal circulation roads, and primary access to the apartments will be from Road 15. The Project would allow for an additional evacuation route for the existing residences on Road 15 and Lincoln Avenue by connecting the two existing residential neighborhoods. Road improvements will be designed to meet City standard specifications. The Project would not substantially increase hazards due to a design feature or incompatible uses. Therefore, impacts would be less than significant.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

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

The Project does not involve a change to any emergency response plan. Development of the proposed Project will result in increased circulation in the area, which would be temporary for construction and insignificant for operation (as discussed in Impact #3.4.17a Transportation and Traffic). As discussed in Impact #3.4.17c above, the Project would add an evacuation route by connecting existing residential neighborhoods that utilize Road 15 and Lincoln Avenue. Therefore, improving emergency access in the area. As discussed in Impact #3.4.15 Public Services, the Tentative Tract Map 22-0011 will be reviewed by the Fire Department and Public Works Department to verify compliance with all relevant road design standards (Municipal Code 17.20.090). Therefore, a less-than-significant impact would occur.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

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

Would the Project:

- a. Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:
 - i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or
 - ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

☐ ☒ ☐ ☐

☐ ☒ ☐ ☐

Discussion

In this section, the analysis focuses on the impacts associated with the Project site and related improvements. For the purposes of this analysis, the Annexation Only Area has no new development or change in land use proposed, and this area is considered part of the baseline.

Impact #3.3.18a(i) – Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is listed or eligible for listing in the California Register of

Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?

As discussed in Impact #3.4.5a through #3.4.5c Cultural Resources, on **January 28, 2026**, pursuant to Public Resources Code Section 21080.3.1 and Government Code Section 65300 *et seq*, Senate Bill 18, letters were sent to each of the Native American tribes within the geographic area as identified by the NAHC (see Appendix A) and will close on **April 28, 2026**. No tribe requested consultation. On **October 21, 2025**, pursuant to Assembly Bill 52, letters were sent to each of the Native American tribes within the geographic area as identified by the NAHC (see Appendix A), and the commenting period was closed on **November 21, 2025**. The letters included a Project description and location maps.

Upon any ground-breaking activity, there is the possibility of uncovering an object of cultural value. MM CUL-1 and MM CUL-2 must be implemented if any artifacts or human remains are discovered. Therefore, the Project would have a less-than-significant impact with mitigation incorporated.

MITIGATION MEASURE(S)

Implement MM CUL-1 and MM CUL-2.

LEVEL OF SIGNIFICANCE

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

Impact #3.3.13a(ii) – Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

See discussion in Impact #3.4.5 Cultural Resources and Impact #3.4.1.18(i) above.

With implemented MM CUL-1 and CUL-2, the Project would not cause a substantial adverse change in the significance of a tribal cultural resource. Therefore, impacts are considered less than significant with mitigation measures incorporated.

MITIGATION MEASURE(S)

Implement MM CUL-1 and MM CUL-2.

LEVEL OF SIGNIFICANCE

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

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than- Significant Impact	No Impact
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3.4.19 - UTILITIES AND SERVICE SYSTEMS

Would the Project:

a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which would cause significant environmental effects?	☐	☒	☐	☐
b. Have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☒	☐	☐
c. Result in a determination by the wastewater treatment provider that serves or may serve the Project that it has adequate capacity to serve the Project's projected demand in addition to the provider's existing commitments?	☐	☒	☐	☐
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e. Comply with federal, State, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

Discussion

This section describes the existing utility and infrastructure systems (water, wastewater, stormwater, electricity, and natural gas) to serve the Project and the impact of the Project on these systems. For the purposes of this analysis, the Annexation Only Area has no new development and is consistent with the General Plan. However, it is assumed the Annexation Only Area residents are already served by utility service providers (i.e., electricity, natural gas, and telecommunications), therefore is considered part of the baseline. However, the Annexation Only Area is included in the water and wastewater analysis, since it is presumed that at some time in the future, these homes will be connected to City services.

Impact #3.4.19a – Would the Project require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power,

natural gas, or telecommunications facilities, the construction or relocation of which would cause significant environmental effects?

Water

As previously discussed in Impact #3.4.10b Hydrology and Water Quality, the Project site is within the City's SOI, and the proposed Project is consistent with the HDR land use designation. Therefore, high-density residential housing has been planned for the Project site. The Water Division would review the proposed subdivision (TTM 22-0011) and Project to determine whether the City has the capacity to serve the Project water, while maintaining compliance with the Chowchilla Basin GSP and City of Chowchilla UWMP. The Project site and Annexation Only Area would be required to be annexed into the City and issued a will-serve letter in order to provide water services. Mitigation Measure HYD-1 requires the applicant/developer/Project proponent to obtain a will-serve letter prior to building permit issuance, as this letter serves as confirmation that the City has the capacity to provide water to the Project. Furthermore, pursuant to Municipal Code Section 17.76.010, the Project would be required to pay applicable development impact fees for essential infrastructure, such as water distribution facilities and water supply well facilities.

Wastewater Treatment

The City of Chowchilla Wastewater Treatment Plant (WWTP), which provides secondary treatment of municipal wastewater received from throughout the City, is permitted to treat 1.8 million gallons/day (mgd) (City of Chowchilla, 2014). The WWTP is located at the southwest corner of South 5th Street and Avenue 24½ (East Palm Parkway), adjacent to the City's designated Light and Heavy Industrial area north of Berenda Slough. The City's existing wastewater treatment facility is an adequate size to serve the existing population and modest expansion (City of Chowchilla, 2010). It could serve approximately another 2,200 dwelling units or a single large-scale industrial user. As the City grows toward full 2040 build-out, additional capacity will be necessary due to the projected increase in population. A new wastewater treatment facility, which is to be located outside of the Planning Area but within the SOI (west of SR 99, adjacent to Ash Slough and SR 152), has been planned and discussed in the 2040 General Plan. The City would review the proposed subdivision (TTM 22-0011) and Project to determine whether the City has the capacity to serve the Project's wastewater. The Project site and Annexation Only Area would be required to be annexed into the City and issued a will-serve letter in order to provide wastewater services. Mitigation Measure UTL-1 requires the applicant/developer/Project proponent to obtain a will-serve letter prior to building permit issuance, as this letter serves as confirmation that the City has the capacity to provide wastewater services to the Project. Furthermore, pursuant to Municipal Code Section 17.76.010, the Project would be required to pay applicable development impact fees for essential infrastructure, such as sewage treatment facilities and sewage collection facilities.

Stormwater Drainage

The City would provide storm drain services. The City's Storm Drainage Master Plan accounts for growth out to 2030 using the General Plan study area. The Project site is consistent with the HDR land use designation assigned in the General Plan. Therefore, the City's infrastructure under the Storm Drainage Master Plan can accommodate the growth generated by the proposed Project. Furthermore, pursuant to Municipal Code Section 17.76.010, the Project would be required to pay applicable development impact fees for essential infrastructure, such as storm drainage facilities.

Electric Power and Natural Gas

As previously discussed in Impact #3.4.6a Energy, the Project and proposed residences will not utilize natural gas; all residential units will be equipped with 450-watt solar panels, utilize all electric appliances, and will be EV-ready (pre-wired during construction to allow for installation of EV residential charger in the future). Pre-wiring homes reduces the homeowners' cost to retrofit the home in order to use an EV vehicle. The Project is expected to connect to PG&E utilities via infrastructure extensions and connections that are acceptable to both PG&E and the City.

Telecommunications Facilities

Landline telephone services are primarily provided by AT&T, and cellular telephone and internet is provided by a variety of service providers. The development of new telecommunication facilities is not included in this Project.

Conclusion

With the implementation of HYD-1 and UTL-1, the Project would have a less-than-significant impact on the environment due to the new or expanded water, wastewater treatment, or stormwater drainage, electric power, natural gas, or telecommunications facilities.

MITIGATION MEASURE(S)

Implement MM HYD-1.

MM UTL-1: Prior to building permit issuance, the developer/Project proponent shall obtain a will-serve letter from the City's Water Division to verify the City's Wastewater Division.

LEVEL OF SIGNIFICANCE

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

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

The City of Chowchilla gets its water supply from groundwater aquifers. According to the City's 2040 General Plan, the Project would have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal and multiple dry years. In addition, as mentioned in Impact #3.4.10b Hydrology and Water Quality and in Impact #3.4.19a above, the Project applicant will be responsible for obtaining a will-serve letter from the City's Water Division prior to issuance of building permits (MM HYD-1). Therefore, with the implementation of HYD-1, the City would ensure that there is sufficient water supply available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years.

MITIGATION MEASURE(S)

Implement MM HYD-1.

LEVEL OF SIGNIFICANCE

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

Impact #3.4.19c – Would the Project result in a determination by the wastewater treatment provider that serves or may serve the Project that it has adequate capacity to serve the Project's projected demand in addition to the provider's existing commitments?

As discussed in Impact #3.4.19a above, the Project would be required to obtain a will-serve letter to ensure that the City's wastewater treatment system has adequate capacity to serve the Project's projected demand in addition to the City's existing commitments (MM UTL-1). Therefore, with implementation of UTL-1, the Project would result in a less than significant determination by the wastewater treatment provider that serves the Project that it has adequate capacity to serve the Project and its existing commitments.

MITIGATION MEASURE(S)

Implement MM UTL-1.

LEVEL OF SIGNIFICANCE

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

Impact #3.4.19d – Would the Project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

The solid waste generated from the Project will be transported to the Fairmead Sanitary Landfill, located at 21739 Road 19 in Chowchilla. The Fairmead Sanitary Landfill (20-AA-0002) has a capacity of 9,400,000 cubic yards available to serve the County of Madera, including the City of Chowchilla. Out of the 9,400,000 cubic yards, approximately 5,552,894 cubic yards remain to serve Madera County and the City of Chowchilla (Cal Recycle, 2026a). As discussed in Impact #3.4.14a Population and Housing, the Project would result in a

maximum total of approximately 664 people. With an average of 12.23 pounds of trash per household per day, the Project would generate 1,482.03 tons of solid waste annually ($664 \times 12.23 \times 365 / 2,000 \text{ lbs}$) (Cal Recycle, 2026b). Given the remaining capacity at the Fairmead Sanitary Landfill, the Project would not generate solid waste in excess of the capacity of local infrastructure. Furthermore, the Project would be required to comply with all federal, State, and local statutes and regulations related to the handling and disposal of solid waste. Therefore, the implementation of the Project would result in a less-than-significant impact.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

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

The City's contracted solid waste collection purveyor is also responsible, under the City's solid waste collection contract, to meet or exceed the waste diversion goals required by AB 939 (City of Chowchilla, 2014). As previously stated in Impact #3.4.19d above, the Project would be required to comply with all federal, State, and local statutes and regulations related to solid waste. Therefore, the Project would have a less-than-significant impact.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than- Significant Impact	No Impact
3.4.20 - WILDFIRE				
Would the Project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose Project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☒	☐
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☒	☐
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☒	☐

Discussion

In this section, the analysis focuses on the impacts associated with the Project site and related improvements. For the purposes of this analysis, the Annexation Only Area has no new development or change in land use proposed, and this area is considered part of the baseline.

Impact #3.4.20a – Would the Project substantially impair an adopted emergency response plan or emergency evacuation plan?

The Project site is within the Plan Area of the Madera County Local Hazard Mitigation Plan, and would comply with all applicable City safety requirements adopted in Chapter 15.12 (Fire Prevention Code) and Section 2.28 (Emergency Response Plan) of the Chowchilla Municipal Code. As previously discussed in Impact #3.4.17d *Transportation and Traffic*, the Project would add an evacuation route by connecting existing residential neighborhoods that utilize Road 15 and Lincoln Avenue. Therefore, improving emergency access in the area. As discussed in Impact #3.4.15 Public Services, the Tentative Tract Map 22-0011 will be

reviewed by the Fire Department and Public Works Department to verify compliance with all relevant road design standards (Municipal Code 17.20.090). As a result, emergency vehicles would have adequate access to all the populated areas within the Project area. Therefore, any impacts associated with emergency response or an evacuation plan during construction and the build-out of the Project would be less than significant.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

Impact #3.4.20b – Would the Project due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose Project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

As previously discussed in Impact #3.4.9 f and g *Hazards and Hazardous Materials*, the Project site is not within a Fire Severity Zone, not within a wildland urban interface area, and will be within the LRA of the Chowchilla VFD after annexation into the City limits is approved. The Project site is not within a High Fire Severity Zone, not within a WUI zone, and is substantially flat with no sloping. All construction under the proposed Project shall comply with the current California Fire Code, County standards, and City policies and implementation measures to minimize potential risks to wildfire exposure. Therefore, the impact would be less than significant.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

Impact #3.4.20c – 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?

The Project would not develop fuel breaks or emergency water sources. The Project would utilize existing powerlines, and any utility installations would be developed to City standards. Therefore, the Project would not exacerbate fire risk related to the installation or maintenance of associated infrastructure. Impacts would be less than significant.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

Impact #3.4.20d – 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?

As previously discussed in Impact #3.4.17a(iv) *Geology and Soils*, the Project site is classified by the California Geologic Survey Landslide database as an area that does not experience landslides and is substantially flat with no sloping (United States Geological Survey, 2026). Furthermore, as discussed in Impact #3.4.10c(ii), there are no water courses on or within the vicinity of the Project site, and the Project site would adhere to all applicable City standards for stormwater drainage design and construction. Therefore, given the low fire risk, as analyzed in a, b, and c above, the Project would not 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. As such, impacts would be less than significant.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

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

- | | | | | | |
|----|--|--------------------------|-------------------------------------|--------------------------|--------------------------|
| a. | Does the Project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory? | ☐ | ☒ | ☐ | ☐ |
| b. | Does the Project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.) | ☐ | ☒ | ☐ | ☐ |
| c. | Does the Project have environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly? | ☐ | ☒ | ☐ | ☐ |

Discussion

In this section, the analysis focuses on the impacts associated with the Project site and related improvements. For the purposes of this analysis, the Annexation Only Area has no new development or change in land use proposed, and this area is considered part of the baseline.

Impact #3.4.21a – Does the Project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?

As evaluated in this IS/MND, the proposed Project would not substantially degrade the quality of the environment; substantially reduce the habitat of a fish or wildlife species; cause

a fish or wildlife population to drop below self-sustaining levels; threaten to eliminate a plant or animal community; reduce the number or restrict the range of an endangered, rare, or threatened species; or eliminate important examples of the major periods of California history or prehistory. With implementation of the Mitigation Measures BIO-1 through BIO-6 and CUL-1 and CUL-2, the proposed Project would not have the potential to degrade the quality of the environment, significantly impact biological resources, or eliminate important examples of the major periods of California's history or prehistory. Therefore, with the following mitigation measures, the Project would have a less-than-significant impact.

MITIGATION MEASURE(S)

Implement MM BIO-1 through MM BIO-6 and MM CUL-1 and MM CUL-2.

LEVEL OF SIGNIFICANCE

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

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

As described in the impact analyses in Impact Sections 3.4.1 through 3.4.21 of this IS/MND, any potentially significant impacts of the proposed Project would be reduced to a less-than-significant level following the incorporation of the mitigation measures listed. The proposed Project would not otherwise combine with the impacts of related development to add considerably to any cumulative impacts in the region. With implementation of Mitigation Measures AES 1, AIR-1, BIO-1 through BIO-6, CUL-1 and CUL-2, GEO-1 through GEO-3, HAZ-1 through HAZ-3, HYD-1 and HYD-2, NSE-1, TRA-1 and UTL-1, the proposed Project would not have impacts that are individually limited but cumulatively considerable. Therefore, the Project would have a less than cumulatively considerable impact with mitigation incorporated.

MITIGATION MEASURE(S)

Implement AES 1, AIR-1, BIO-1 through BIO-6, CUL-1 and CUL-2, GEO-1 through GEO-3, HAZ-1 through HAZ-3, HYD-1 and HYD-2, NSE-1, TRA-1 and UTL-1.

LEVEL OF SIGNIFICANCE

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

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

All of the Project's impacts, both direct and indirect, that are attributable to the Project were identified and mitigated. Implementation of Project Mitigation Measures AES 1, AIR-1, BIO-1 through BIO-6, CUL-1 and CUL-2, GEO-1 through GEO-3, HAZ-1 through HAZ-3, HYD-1 and

HYD-2, NSE-1, TRA-1 and UTL-1 will substantially reduce or eliminate the impacts of the Project. Therefore, the proposed Project would not either directly or indirectly cause substantial adverse effects on human beings because all potentially adverse direct impacts of the proposed Project are identified as having no impact, less-than-significant impact, or less-than-significant impact with mitigation.

MITIGATION MEASURE(S)

Implement AES 1, AIR-1, BIO-1 through BIO-6, CUL-1 and CUL-2, GEO-1 through GEO-3, HAZ-1 through HAZ-3, HYD-1 and HYD-2, NSE-1, TRA-1 and UTL-1.

LEVEL OF SIGNIFICANCE

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

SECTION 4 - LIST OF PREPARERS

4.1 - City of Chowchilla

- Denise Munoz, Community & Economic Development Director
- Susan Long, Contract City Planner

4.2 - QK

- Jaymie Brauer, Project Manager / QAQC
- Bella Hedtke, Associate Planner, Author

SECTION 5 - REFERENCES

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SECTION 6 - MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Monitoring Program					
Impact	Mitigation Measure	Time Frame for Implementation	Responsible Monitoring Agency	Date	Initials
	Aesthetics				
#1	<p>AES-1: Prior to issuance of ground disturbance along Robertson Boulevard, the developer or contractor shall implement the following measures:</p> <p>a) Indicate on the plans which, if any, of the existing palm trees construction will be impacted during construction activities. If construction cannot avoid the palm trees, the developer or contract shall hire a qualified botanist, arborist or other professional to relocate the impacted trees to a new location in close proximity. A copy of the contract with the qualified professional shall be submitted to the City as proof of compliance.</p> <p>b) The developer shall routinely care for and maintain the relocated tree(s) for at least 1 year after the relocation to ensure the plant's survival. A report shall be submitted to the City at the end of the 12 month period that illustrates the success of the relocation.</p>	Prior to grading permits	Project developer and Lead Agency		
		<p>Steps to Compliance:</p> <ol style="list-style-type: none"> 1. The developer shall determine whether the palm trees can be avoided or might need to be removed as a result of construction. This determination shall be displayed on a site plan submitted to the City. 2. If the palm trees cannot be avoided the developer shall hire a qualified botanist, arborist or other professional to relocate the palm trees. 3. A copy of the contract with the qualified professional shall be submitted to the City as proof of compliance. 4. The developer may need to coordinate with local property owners, the City and/or Caltrans to locate an appropriate alternative location to relocate the impacted palm trees. 5. Once the palm trees have been replanted the developer shall routinely care for the trees for at least 12 months after relocation to ensure the tree's survival. 			

Mitigation Monitoring Program					
Impact	Mitigation Measure	Time Frame for Implementation	Responsible Monitoring Agency	Date	Initials
		6. A report shall be submitted to the City at the end of the 12 month period that illustrates the success of the relocation.			
	Agriculture and Forest Resources				
	No Mitigation required.				
	Air Quality				
#2	AIR-1: During construction of the proposed Project, the Project contractor shall ensure all off-road, diesel-powered construction equipment of 50 horsepower or more used for the Project construction meets, at a minimum, the California Air Resources Board Tier 2 emissions standards equipped with Level 3 diesel particulate filters or the equivalent.	During construction	Project developer and Lead Agency		
		Steps to Compliance: 1. The Project developer shall ensure that all off-road, diesel-powered construction equipment used for the Project meets California Air Resources Board Tier 2 emissions standards equipped with Level 3 diesel particulate filters or the equivalent. 2. An equipment list shall be submitted to the City that demonstrates equipment compliance with MM AIR-1.			
	Biological Resources				
#3	BIO-1: To avoid impacts to nesting Swainson’s hawks, construction activities shall occur, where possible, outside the nesting season, typically defined as March 1-September 15.	During construction	Project developer and Lead Agency		
		Steps to Compliance: 1. If feasible, avoid construction during March 1 – September 15. 2. If not feasible, implement MM BIO-2.			
#4	BIO-2: If Project-related activities must occur between March 1 and September 15, a qualified biologist shall conduct surveys prior to the start of construction for active Swainson’s hawk nests within ½ mile of the site in accordance with the SHTAC (2000) guidelines. The guidelines define five survey periods for	Prior to construction that occurs during March 1	Project developer and Lead Agency		

Mitigation Monitoring Program					
Impact	Mitigation Measure	Time Frame for Implementation	Responsible Monitoring Agency	Date	Initials
	Swainson's hawk: Period I: January 1-March 20; Period II: March 20-April 5; Period III: April 5-April 20; Period IV: April 21-June 10; and Period V: June 10-July 30. The guidelines prescribe a minimum of three surveys per survey period for at least the two survey periods immediately prior to a Project's initiation, and specifically recommend that surveys be completed in Periods II, III, and V. A copy of the surveys' results shall be provided to the City prior to the issuance of grading or building permits.	and September 15 and during construction			
		Steps to Compliance: <ol style="list-style-type: none"> 1. If construction must occur during March 1 – September 15 then a qualified biologist shall be responsible for a preconstruction survey active Swainson's hawk nests within ½ mile of the Project site in accordance with the SHTAC (2000) guidelines. 2. If necessary, the qualified biologist shall contact CDFW and USFWS to determine next steps. 3. If necessary, the qualified biologist shall implement next steps in consultation with the wildlife agencies. Next steps may include implementing avoidance buffers. 4. The qualified biologist shall prepare a brief report to be submitted to the wildlife agencies within 5 days of completion of the preconstruction survey. 5. Lead Agency shall verify compliance. 			
#5	BIO-3: Should any active Swainson's hawk nests be discovered within the survey area, an appropriate disturbance-free buffer shall be established based on local conditions and agency guidelines. Disturbance-free buffers shall be maintained until a qualified biologist has determined that the young have fledged and are capable of foraging independently.	Prior to construction that occurs during March 1 and September 15 and during construction	Project developer and Lead Agency		

Mitigation Monitoring Program					
Impact	Mitigation Measure	Time Frame for Implementation	Responsible Monitoring Agency	Date	Initials
		Steps to Compliance: <ol style="list-style-type: none"> 1. If a Swainson's hawk nest is discovered during the preconstruction survey required in MM BIO-2 an avoidance buffer range may be required, with the avoidance buffer from any specific nest being determined by a qualified biologist and existing protocols. 2. Work is to continue under approval and guidance of qualified biologist. 			
#6	BIO-4: If feasible, the Project shall be implemented outside of the avian nesting season, typically defined as February 1 to August 31.	During construction	Project developer and Lead Agency		
		Steps to Compliance: <ol style="list-style-type: none"> 1. If feasible, avoid construction during February 1 to August 31. 2. If not feasible, implement MM BIO-5. 			
#7	BIO-5: If construction must occur between February 1 and August 31, a qualified biologist shall conduct pre-construction surveys for active bird nests within 10 days prior to the start of construction. The survey area shall encompass the site and accessible surrounding lands within 250 feet for nesting migratory birds and 500 feet for raptors (i.e., birds of prey).	10 days prior to construction occurring during February 1 and August 31 and during construction	Project developer and Lead Agency		
		Steps to Compliance: <ol style="list-style-type: none"> 1. If construction must occur between February 1 and August 31, a qualified biologist shall conduct pre-construction surveys for active bird nests. 2. Should any bird nests be found, implement MM BIO-6. 			

Mitigation Monitoring Program					
Impact	Mitigation Measure	Time Frame for Implementation	Responsible Monitoring Agency	Date	Initials
#8	BIO-6: Should any active nests be discovered in or near proposed construction zones, the biologist shall identify a suitable construction-free buffer around the nest. This buffer shall be identified on the ground with flagging or fencing and shall be maintained until the biologist has determined that the young have fledged and are capable of foraging independently.	10 days prior to construction occurring during February 1 and August 31 and during construction	Project developer and Lead Agency		
		Steps to Compliance: <div>1. If an active nests for nesting migratory birds and raptors (i.e., birds of prey) are found during preconstruction surveys implemented in MM BIO-5 or any time during construction of the Project, an avoidance buffer range may be required, with the avoidance buffer from any specific nest being determined by a qualified biologist.</div> <div>2. Work is to continue under approval and guidance of qualified biologist.</div>			
	Implement MM AES-1.				
	Cultural Resources				
#9	CUL-1: In the event that a concentration of artifacts or culturally modified soil deposits (including trash pits older than 50 years) are discovered at any time	During construction	Project developer and Lead Agency		

Mitigation Monitoring Program					
Impact	Mitigation Measure	Time Frame for Implementation	Responsible Monitoring Agency	Date	Initials
	during Project construction, all work shall stop until a qualified archaeologist views the find to make a preliminary evaluation. If warranted, further archaeological work in the discovery area should be performed.	Steps to Compliance: <ol style="list-style-type: none"> 1. If necessary, work shall cease and the Project proponent shall retain a qualified archaeologist to assess finds and recommended procedures. 2. The qualified archaeologist and/or paleontologist shall assess the significance of the find and determine next steps. 3. A copy of the additional studies shall be submitted to the Lead Agency to verify compliance. 			
#10	CUL-2: In the event that human remains are unearthed during excavation and grading activities of any development at the Project, all activity shall cease immediately. Pursuant to Health and Safety Code (HSC) Section 7050.5, no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98(a). If the remains are determined to be of Native American descent, the coroner shall, within 24 hours, notify the Native American Heritage Commission (NAHC). The NAHC shall then contact the most likely descendent of the deceased Native American, who shall then serve as the consultant on how to proceed with the remains. Pursuant to PRC Section 5097.98(b), upon the discovery of Native American remains, the landowner shall ensure that the immediate vicinity, according to generally accepted cultural or archaeological standards or practices, where the Native American human remains are located is not damaged or disturbed by further development activity until the landowner has discussed and conferred with the most likely descendants regarding their recommendations, if applicable, taking into account the possibility of multiple human remains. The landowner shall discuss and confer with the descendants all reasonable options regarding the descendants' preferences for treatment.	During construction	Project developer and Lead Agency		
		Steps to Compliance: <ol style="list-style-type: none"> 1. If necessary, work shall cease and the Project proponent shall retain a qualified archaeologist to assess finds and recommended procedures. 2. The qualified archaeologist and/or paleontologist shall assess the significance of the find and determine next steps. 3. The Lead Agency shall verify compliance. 			

Mitigation Monitoring Program					
Impact	Mitigation Measure	Time Frame for Implementation	Responsible Monitoring Agency	Date	Initials
	Energy				
	No Mitigation required.				
	Geology and Soils				
#11	<p>GEO-1: Prior to ground-disturbing activities, the Project proponent / developer shall prepare and implement a Stormwater Pollution Prevention Plan (SWPPP) that specifies best management practices (BMP), with the intent of keeping all products of erosion from moving offsite. The SWPPP shall include a site map that shows the construction site perimeter, existing and proposed manmade facilities, stormwater collection and discharge points, general topography both before and after construction, and drainage patterns across the Project site. Additionally, the SWPPP shall contain a visual monitoring program and a chemical monitoring program for non-visible pollutants to be implemented (if there is a failure of best management practices). The requirements of the SWPPP and BMPs shall be incorporated into design specifications and construction contracts. Recommended best management practices for the construction phase may include the following:</p> <ul style="list-style-type: none"> • Stockpiling and disposing of demolition debris, concrete, and soil properly, • Protecting any existing storm drain inlets and stabilizing disturbed areas, • Implementing erosion controls, • Properly managing construction materials, and • Managing waste, aggressively controlling litter, and implementing sediment controls. 	<p>Prior to issuance of grading permits and during construction</p>	<p>Project proponent / developer and Lead Agency</p>		
<p>Steps to Compliance:</p> <ol style="list-style-type: none"> 1. The Project proponent / developers shall submit an approved copy of the SWPPP from the Regional Water Quality Control Board to the City. 2. All applicable SWPPP and BMPs shall be included in the Project's grading permit application and other applicable plans submitted to the City, as determined by the qualified professional and the City. 3. The Lead Agency shall verify compliance with the mitigation measure. 					

Mitigation Monitoring Program					
Impact	Mitigation Measure	Time Frame for Implementation	Responsible Monitoring Agency	Date	Initials
#12	GEO-2: A civil engineer or soils engineer registered in California shall complete a Soils Investigation and Evaluation Report during the preparation of the improvement plans, once determined. The investigation and subsequent report shall provide detailed recommendations for structure configurations, locations, foundations, footings, drainage, and other items as necessary at the review and approval of the Public Works Department.	Prior to issuance of grading and building permits	Project developer and Lead Agency		
		Steps to Compliance: <ol style="list-style-type: none"> 1. The Project developer or their qualified agent shall submit a Soils Investigation and Evaluation Report prepared by a California registered civil engineer or soils engineer. 2. The Project developer or their qualified agent shall coordinate with City staff through the permit review process to meet local and State standards for permit issuance. 3. The Project developer shall ensure that construction adheres to the approved plan designs and specifications. 			

Mitigation Monitoring Program					
Impact	Mitigation Measure	Time Frame for Implementation	Responsible Monitoring Agency	Date	Initials
#13	GEO-3: In the event that unique paleontological or geological resources are discovered during excavation and/or construction activities, construction shall stop in the immediate vicinity of the find and a qualified paleontologist shall be consulted to determine whether the resource requires further study. The qualified paleontologist shall make recommendations to the City on the measures that shall be implemented to protect the discovered resources, including but not limited to, excavation of the finds and evaluation of the finds. If the resources are determined to be significant, mitigation measures shall be identified by the monitor and recommended to the Lead Agency. Appropriate mitigation measures for significant resources could include avoidance or capping, incorporation of the site in green space, parks, or open space, or data recovery excavations of the finds. No further grading shall occur in the area of the discovery until the Lead Agency approves the measures to protect these resources. Any paleontological/geological resources recovered as a result of mitigation shall be provided to a City-approved institution or person who is capable of providing long-term preservation to allow future scientific study.	During construction	Project developer and Lead Agency		
		Steps to Compliance: 1. If necessary, work shall cease and the Project proponent shall retain a qualified paleontologist to assess finds and recommended procedures. 2. The qualified archaeologist and/or paleontologist shall assess the significance of the find and determine next steps. 3. The Lead Agency shall verify compliance.			
Greenhouse Gas Emissions					
	No Mitigation required.				
Hazardous Materials					
#14	HAZ-1: Prior to demolition of the existing warehouse structure, a qualified professional shall be retained. The inspector shall be present on-site during demolition and excavation of the existing concrete-lined inspection pits, to assess the subsurface condition inside the pits and to collect soil samples, as necessary. All findings shall be reported in writing to the City of Chowchilla. If inspection of the pits and analysis of soil samples indicate no significant contamination screening levels then no further action is needed. If warranted, additional remediation may include but is not limited to the removal of the	During demolition	Project developer and Lead Agency		
		Steps to Compliance: 1. The Project developer shall retain a qualified professional to be present on-site during			

Mitigation Monitoring Program					
Impact	Mitigation Measure	Time Frame for Implementation	Responsible Monitoring Agency	Date	Initials
	contaminated soil and disposal at a qualified disposal facility and bringing in clean soil.	<p>demolition and excavation of the existing concrete-lined inspection pits within the existing warehouse structure on the Project site.</p> <ol style="list-style-type: none"> If necessary, the qualified professional will collect soil samples for further testing. All findings shall be reported in writing to the City of Chowchilla. As determined by the qualified professional soil samples and/or remediation may be required. 			
#15	HAZ-2: During construction activities, in the event an unknown underground storage tank(s) or a septic system are uncovered or damaged during excavation or grading activities, all work in that area shall cease. The State Water Resources Control Board (SWRCB) and the Madera County Environmental Health Division shall be contacted to determine what appropriate remediation may be required and to identify the appropriate requirements and approvals. A report of all communication and the determination made by the SWRCB and the County Public Health Division shall be submitted to the City.	During construction	Project developer and Lead Agency		
		Steps to Compliance: <ol style="list-style-type: none"> In the event unknown underground storage tank(s) are uncovered or damaged during excavation or grading activities all work in that area shall cease. The Lead Agency, State Water Resources Control Board, and Madera County Environmental Health Division shall be contacted to determine appropriate remediation, and to identify necessary permits and approvals. All correspondence and determinations made by the SWRCB and County Health Division shall be provided 			

Mitigation Monitoring Program					
Impact	Mitigation Measure	Time Frame for Implementation	Responsible Monitoring Agency	Date	Initials
		to the Lead Agency to provide evidence of compliance.			
#16	HAZ-3: Prior to the start of the demolition of any existing structures on the Project site, a hazardous materials assessment of the existing building shall be performed by a certified asbestos consultant, notification shall be submitted to the San Joaquin Valley Air Pollution Control District, and any abatement requirements shall be completed in order to obtain an approved demolition permit. A copy of the approved permit shall be submitted to the City as evidence of compliance. If no regulated hazardous materials such as lead-based paint or asbestos are found during the assessment, no further action is necessary. A copy of that report shall be provided to the City as evidence of compliance.	Prior to the issuance of demolition permits	Project developer and Lead Agency		
		Steps to Compliance: 1. The Project developer shall retain a certified asbestos consultant to perform a hazardous materials assessment of the existing structure on the Project site. 2. The consultant shall submit notification of their findings to the SJVAPCD. 3. A copy of the approved permit shall be submitted to the City. 4. If necessary, the consultant shall perform any abatement requirements prior to issuance of demolition permits.			
Hydrology and Water Quality					
	Implement MM GEO-1.				
#17	HYD-1: Prior to building permit issuance, the developer/Project proponent shall obtain a will-serve letter from the City’s Water Division.	Prior to building permit issuance	Project proponent, developer and Lead Agency		
		Steps to Compliance:			

Mitigation Monitoring Program					
Impact	Mitigation Measure	Time Frame for Implementation	Responsible Monitoring Agency	Date	Initials
		1. The Project developer shall coordinate with the City's Water Division to obtain a will-serve letter. 2. The Project developer shall submit a copy of the will-serve letter to the City as proof of compliance.			
#18	HYD-2: Prior to building permit issuance, the applicant/developer/Project proponent shall obtain a will-serve letter from the City Storm Water Division.	Prior to building permit issuance	Project proponent, developer and Lead Agency		
		Steps to Compliance: 1. The Project developer shall coordinate with the City's Storm Water Division to obtain a will-serve letter. 2. The Project developer shall submit a copy of the will-serve letter to the City as proof of compliance.			
Land Use and Planning					
	No Mitigation required.				
Mineral Resources					
	No Mitigation required.				
Noise					
#19	NSE-1: Whenever feasible, the construction contractor shall: a. Place all stationary construction equipment so that emitted noise is directed away from sensitive receptors including the existing residences on Road 15, and those located at the northeast corner of the Project site. This includes noise-generating equipment such as portable generators, etc. b. The construction contractor shall locate equipment staging in areas that will create the greatest possible distance between construction-	During construction	Project developer and Lead Agency		
		Steps to Compliance:			

Mitigation Monitoring Program					
Impact	Mitigation Measure	Time Frame for Implementation	Responsible Monitoring Agency	Date	Initials
	<p>related noise sources and noise sensitive receptors nearest the Project site during all Project construction;</p> <p>c. The construction contractor shall ensure that all construction equipment is equipped with manufacturer-approved mufflers and baffles; and</p> <p>d. Project construction hours shall comply with City Noise Element Policy N 4.6: The City of Chowchilla shall limit construction activities to the hours of 7:00 am to 7:00 pm, Monday through Saturday. No construction shall occur on Sundays or national holidays without a permit from the City.</p>	<p>1. As feasible, the Project developer shall adhere to noise reduction measures outlined in this mitigation measure.</p>			
	Population and Housing				
	No Mitigation required.				
	Public Services				
	No Mitigation required.				
	Recreation				
	No Mitigation required.				
	Traffic and Transportation				
#20	TRA-1: Prior to Certificate of Occupancy being issued, the Project Proponent shall pay its fair share, as determined by the City’s Development Impact Fee (DIF) program, for the cost of improvements to the Robertsons Boulevard/SR 233 intersection.	Prior to issuance of Certificate of Occupancy	Project proponent/developer and Lead agency		
		Steps to Compliance: 1. The Project proponent / developer shall ensure compliance with this mitigation measure through payment of the appropriate DIF fees, as determined by the City.			
	Tribal Cultural Resources				
	Implement MM CUL-1 and MM CUL-2.				
	Utilities and Service Systems				

Mitigation Monitoring Program					
Impact	Mitigation Measure	Time Frame for Implementation	Responsible Monitoring Agency	Date	Initials
#21	UTL-1: Prior to building permit issuance, the developer/Project proponent shall obtain a will-serve letter from the City’s Wastewater Division.	Prior to building permit issuance	Project proponent, developer and Lead Agency		
		Steps to Compliance: <div>1. The Project developer shall coordinate with the City’s Wastewater Division to obtain a will-serve letter.</div> <div>2. The Project developer shall submit a copy of the will-serve letter to the City as proof of compliance.</div>			
	Wildfire				
	No Mitigation required.				