Initial Study and Mitigated Negative Declaration for Tule River Tribe Complete Streets and Two Pedestrian Bridges

April 2026

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City of Porterville
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SECTION 1: CEQA Review Process
Project Title: Tule River Tribe Complete Streets and Two Pedestrian Bridges

1.1. California Environmental Quality Act Guidelines

Section 15063 of the California Environmental Quality Act (CEQA) Guidelines requires that the Lead Agency prepare an Initial Study to determine whether a discretionary project will have a significant effect on the environment. All phases of the project planning, implementation, and operation must be considered in the Initial Study. The purposes of an Initial Study, as listed under Section 15063(c) of the CEQA Guidelines, include:

(1) Provide the lead agency with information to use as the basis for deciding whether to prepare an EIR or negative declaration;
(2) Enable an applicant or lead agency to modify a project, mitigating adverse impacts before an EIR is prepared, thereby enabling the project to qualify for a negative declaration;
(3) Assist the preparation of an EIR, if one is required, by:
- *(a) Focusing the EIR on the effects determined to be significant,*
- *(b) Identifying the effects determined not to be significant,*
- *(c) Explaining the reasons for determining that potentially significant effects would not be significant, and*
- *(d) Identifying whether a program EIR, tiering, or another appropriate process can be used for analysis of the project's environmental effects.*

(4) Facilitate environmental assessment early in the design of a project;
(5) Provide documentation of the factual basis for the finding in a negative declaration that a project will not have a significant effect on the environment
(6) Eliminate unnecessary EIRs;
(7) Determine whether a previously prepared EIR could be used with the project.

1.2. Initial Study

This document is the Initial Study/Mitigated Negative Declaration for the proposed Project. In summary, the Project would result in the replacement of an existing pedestrian swing bridge, a new pedestrian swing bridge, sidewalk, trail, streetlights, and other features. See the Project Description at Section 2 of this MND for a full description of the Project's improvements. The City of Porterville ("City") will act as the Lead Agency for this Project under CEQA and the State CEQA Guidelines.

1.3. Environmental Checklist

The Lead Agency may use the CEQA Environmental Checklist Form (CEQA Guidelines, Section 15063(d)(3) and (f)) in preparation of an Initial Study to provide information for determination if there are significant effects of the project on the environment. A copy of the completed Environmental Checklist is set forth in **Section 3**.

1.4. Notice of Intent to Adopt a Negative Declaration

The Lead Agency shall provide a Notice of Intent to Adopt a Negative Declaration (CEQA Guidelines, Section 15072) to the public, responsible agencies, trustee agencies and the county clerk within which the project is located, sufficiently prior to adoption by the Lead Agency of the Negative Declaration to allow the public and agencies the review period. The public review period (CEQA Guidelines, Section 15105) shall not be less than 20 days, unless the Initial Study/Negative Declaration is submitted to the State Clearinghouse, in which case the review period shall not be less than 30 days unless a shorter period is approved by the State Clearinghouse (CEQA Guidelines, Section 15073(a)).

Prior to approving a project, the decision-making body of the Lead Agency shall consider the proposed Negative Declaration or Mitigated Negative Declaration together with any comments received during the public review process, and shall adopt the proposed Negative Declaration or Mitigated Negative Declaration only if it finds on the basis of the whole record before it (including the Initial Study and any comments received), that there is no substantial evidence that the project will have a significant effect on the environment and that the Negative Declaration reflects the Lead Agency's independent judgment and analysis (CEQA Guidelines, Section 15074(b)).

The written and oral comments received during the public review period will be considered by the City of Porterville prior to adopting the Negative Declaration. Regardless of the type of CEQA document that must be prepared, the overall purpose of the CEQA process is to:

1) Assure that the environment and public health and safety are protected in the face of discretionary projects initiated by public agencies or private concerns;
2) Provide for full disclosure of the project's environmental effects to the public, the agency decision-makers who will approve or deny the project, and the responsible trustee

agencies charged with managing resources (e.g. wildlife, air quality) that may be affected by the project; and

3) Provide a forum for public participation in the decision-making process pertaining to potential environmental effects.

According to CEQA Guidelines Section 15070, a public agency shall prepare or have prepared a proposed negative declaration for a project subject to CEQA when:

> *The initial study shows that there is no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment, or the initial study identifies potentially significant effects, but:*
>
> *1) Revisions in the project plans or proposals made by, or agreed to by the applicant before a proposed mitigated negative declaration and initial study are released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur, and*
>
> *2) There is no substantial evidence, in light of the whole record before the agency, that the project as revised may have a significant effect on the environment.*

The Environmental Checklist Discussion contained in Section Three of this document has determined that the environmental impacts of the Project are less than significant with mitigation measures and that a Mitigated Negative Declaration is adequate for adoption by the Lead Agency.

1.5. Negative Declaration or Mitigated Negative Declaration

The Lead Agency shall prepare or have prepared a proposed Negative Declaration or Mitigated Negative Declaration (CEQA Guidelines Section 15070) for a project subject to CEQA when the Initial Study shows that there is no substantial evidence, in light of the whole record before the agency, that the Project may have a significant effect on the environment. The proposed Negative Declaration or Mitigated Negative Declaration circulated for public review shall include the following:

(a) A brief description of the project, including a commonly used name for the project.
(b) The location of the project, preferably shown on a map.
(c) A proposed finding that the project will not have a significant effect on the environment.
(d) An attached copy of the Initial Study documenting reasons to support the finding.
(e) Mitigation measures, if any.

1.6. Intended Uses of Initial Study/Negative Declaration Documents

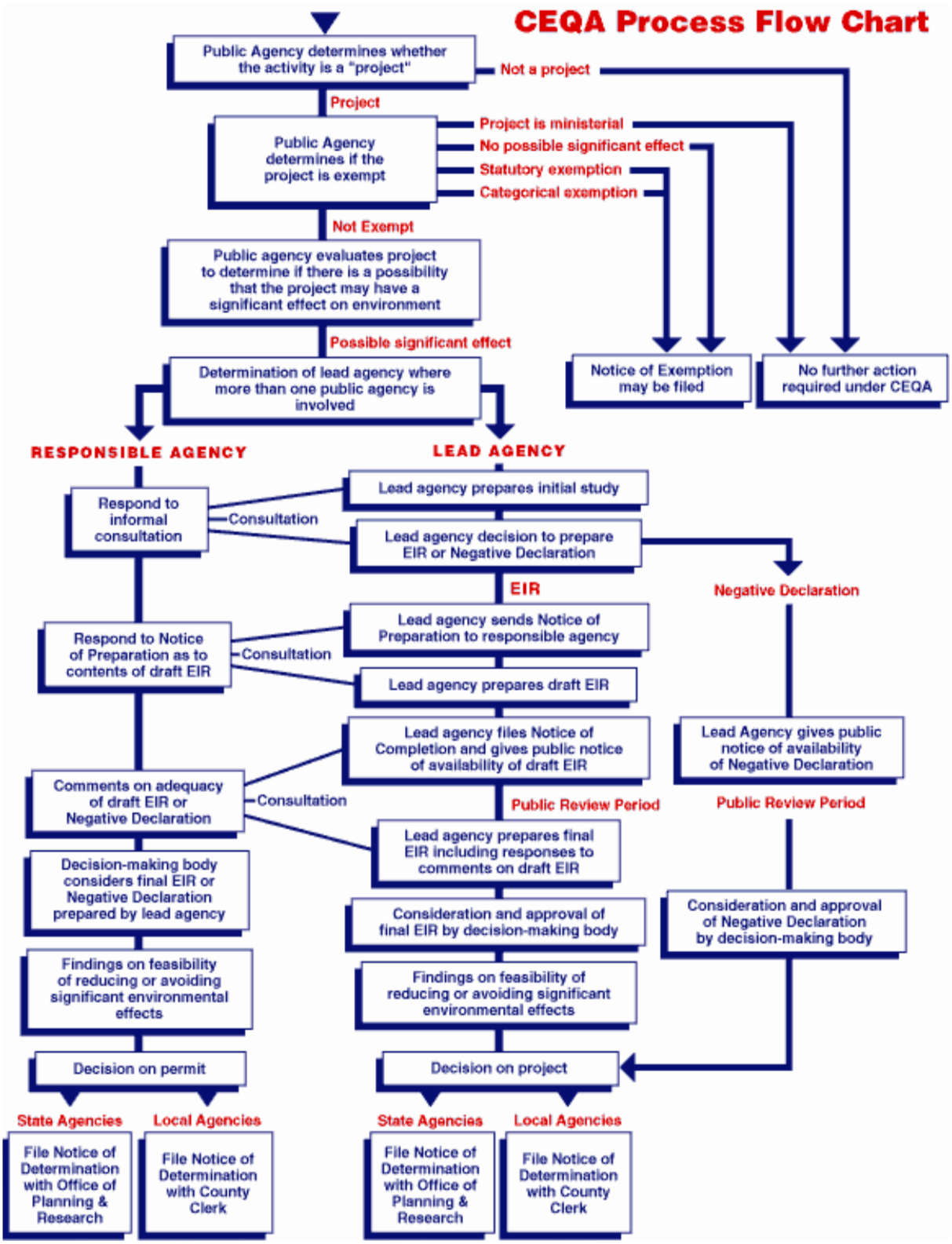
The Initial Study/Negative Declaration document is an informational document that is intended to inform decision-makers, other responsible or interested agencies, and the general public of potential environmental effects of the proposed Project. The environmental review process has been established to enable the public agencies to evaluate environmental consequences and to examine and implement methods of eliminating or reducing any adverse impacts. While CEQA requires that consideration be given to avoiding environmental damage, the Lead Agency must balance any potential environmental effects against other public objectives, including economic and social goals. The City of Porterville, as the Lead Agency, will make a determination, based on the environmental review for the Environmental Study, Initial Study and comments from the general public, if there are less than significant impacts from the proposed project and the requirements of CEQA can be met by adoption of a Mitigated Negative Declaration.

1.7. Notice of Determination (NOD)

The Lead Agency shall file a Notice of Determination within five working days after deciding to approve the Project. The Notice of Determination (CEQA Guidelines, Section 15075) shall include the following:

(1) An identification of the project including the project title as identified on the proposed negative declaration, its location, and the State Clearinghouse identification number for the proposed negative declaration if the notice of determination is filed with the State Clearinghouse.
(2) A brief description of the project.
(3) The agency's name and the date on which the agency approved the project.
(4) The determination of the agency that the project will not have a significant effect on the environment.
(5) A statement that a negative declaration or a mitigated negative declaration was adopted pursuant to the provisions of CEQA.
(6) A statement indicating whether mitigation measures were made a condition of the approval of the project, and whether a mitigation monitoring plan/program was adopted.
(7) The address where a copy of the negative declaration or mitigated negative declaration may be examined.
(8) The identity of the person undertaking a project which is supported, in whole or in part, through contracts, grants, subsidies, loans, or other forms of assistance from one or more public agencies or the identity of the person receiving a lease, permit, license, certificate, or other entitlement for use from one or more public agencies.

1.8. CEQA Process Flow Chart



City of Porterville
291 Main Street
Porterville, CA 93257

SECTION 2: Project Description
Project Title:
Tule River Tribe Complete Streets and Two Pedestrian Bridges Project

2.1. Project Description and Purpose

The proposed Project (Project or project) predominantly consists of two new pedestrian bridge crossings. Generally, the Project would provide safer routes for Tule River Tribe pedestrians to cross the South Fork of the Tule River (Tule River) to access an education center and gymnasium and provide safe river crossings via pedestrian bridges. See section 3.2.7 Project Description for additional project components.

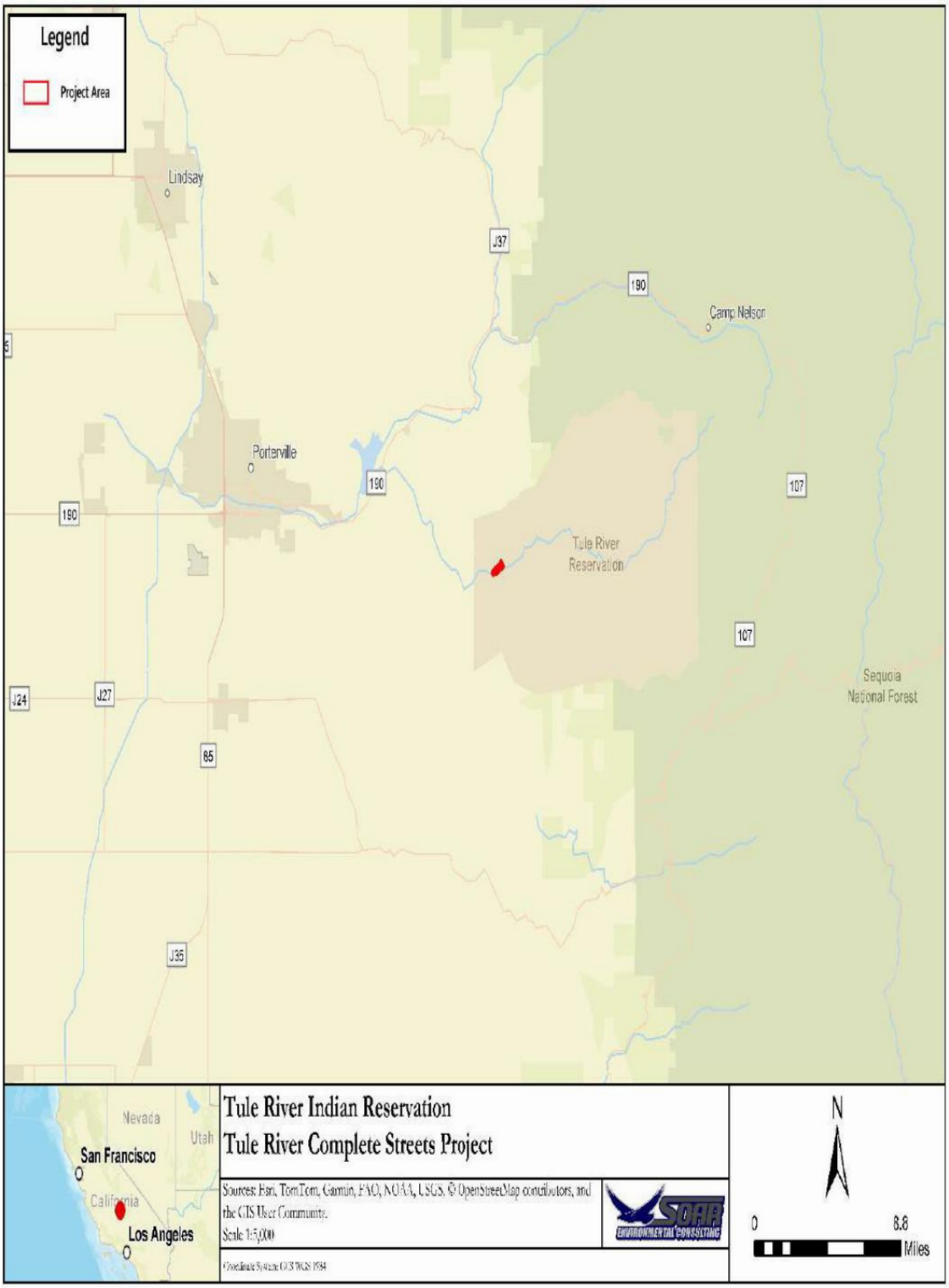
2.2. Project Location

The Project is exclusively located along the South Fork of the Tule River exclusively within the Tule River Reservation, which is located approximately 20 miles southeast of Porterville, CA.

2.3. Other Permits and Approvals

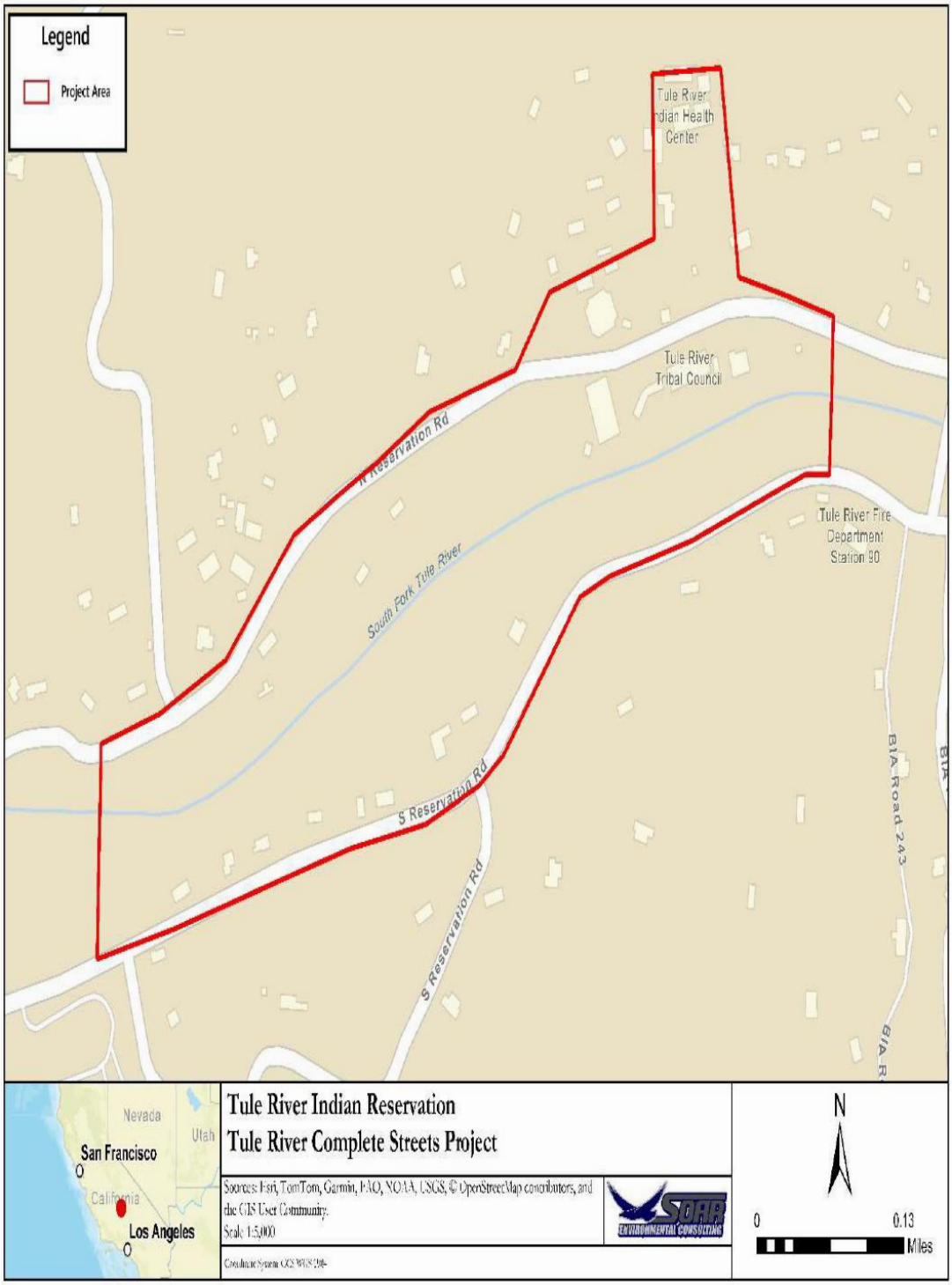
- San Joaquin Valley Air Pollution Control District (SJVAPCD or Air District)
    - To be specified/determined by the Air District
- Central Valley Regional Water Quality Control Board
    - Approval of the Stormwater Pollution Prevention Plan
- California Department of Fish and Wildlife
    - Streambed Alteration Agreement
- Caltrans District 6

Figure 2-1 Regional Location Map



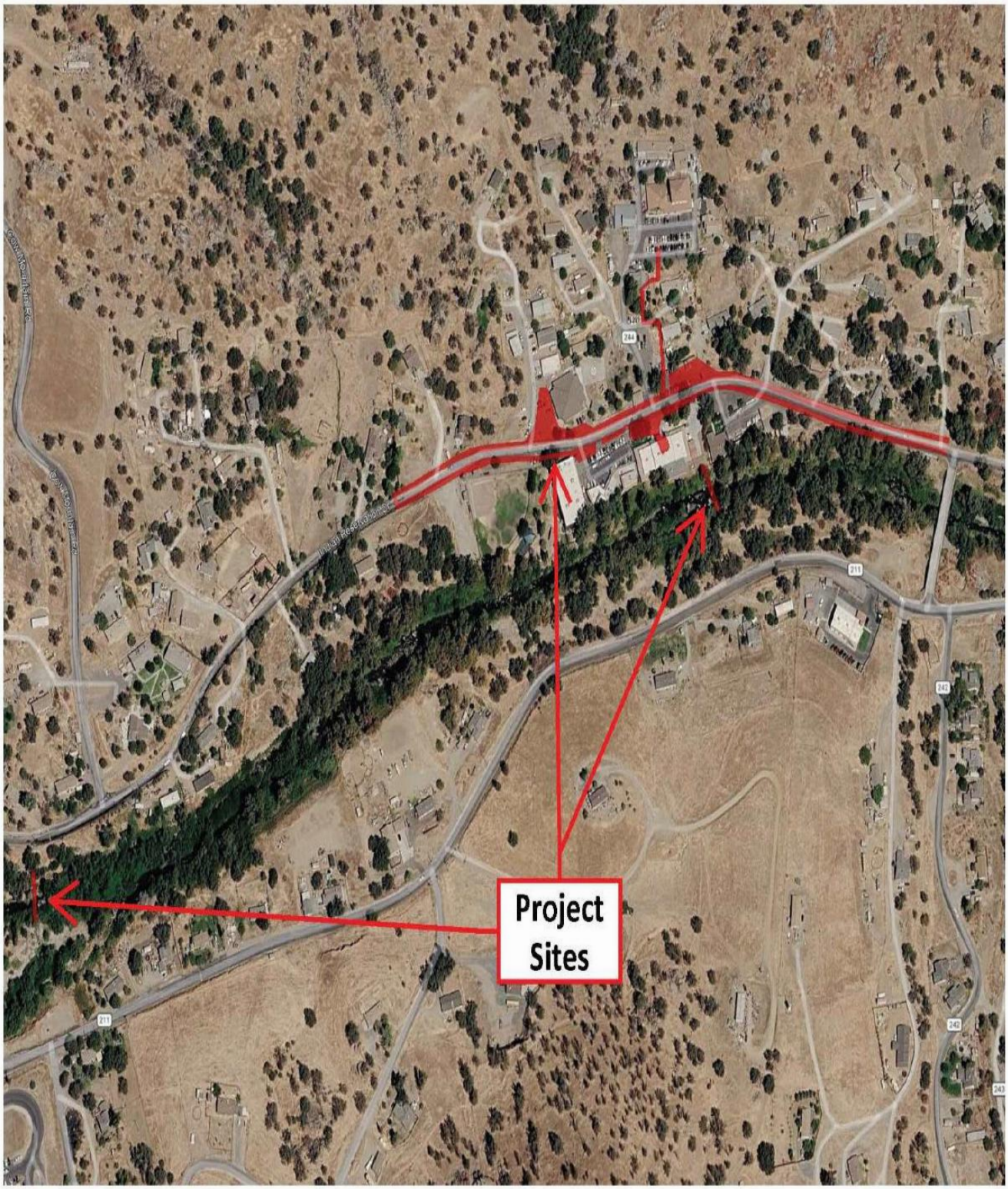
Source: Map provided in CRA by Soar Environmental Consulting, see Appendix C

Figure 2-2 Project Area



Source: Map provided in CRA by Soar Environmental Consulting, see Appendix C

Figure 2-3. Aerial View of Conceptual Project Components Site Plan



Source: Map provided in CRA by Soar Environmental Consulting, see Appendix C

City of Porterville
291 Main Street
Porterville, CA 93257

SECTION 3: Evaluation of Environmental Impacts
Project Title:
Tule River Tribe Complete Streets and Two Pedestrian Bridges Project

This document is the Initial Study/Mitigated Negative Declaration for the proposed Project that includes two new pedestrian bridge crossings over the South Fork of the Tule River within the Tule River Reservation. The Tule River Reservation is located approximately 20 miles southeast of Porterville, CA. Section 3.2.7 provides a more detailed description of the Project's components. The City of Porterville is the Lead Agency for this Project under CEQA and the State CEQA Guidelines.

3.1 Purpose

This environmental document aims to implement CEQA. State CEQA Guidelines Section 15002(a) describes the basic purposes of CEQA:

(1) Inform governmental decision-makers and the public about the potential, significant environmental effects of proposed activities.
(2) Identify the ways that environmental damage can be avoided or significantly reduced.
(3) Prevent significant, avoidable damage to the environment by requiring changes in Projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible.
(4) Disclose to the public the reasons why a governmental agency approved the Project in the manner the agency chose if significant environmental effects are involved.

This Initial Study of environmental impacts has been prepared to conform to the requirements of CEQA (Public Resources Code Section 21000 et seq.) and the State CEQA Guidelines (California Code of Regulations Section 15000 et seq.). According to State CEQA Guidelines Section 15070, a public agency shall prepare or have prepared a proposed negative declaration or mitigated negative declaration for a project subject to CEQA when:

(1) The initial study shows that there is no substantial evidence, in light of the whole record before the agency, that the Project may have a significant effect on the environment, or
(2) The initial study identifies potentially significant effects, but:
a.) Revisions in the Project plans or proposals made by, or agreed to by the applicant before a proposed mitigated negative declaration and initial study are released for public review

would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur, and;
b.) There is no substantial evidence, in light of the whole record before the agency, that the Project as revised may have a significant effect on the environment.

3.2 Initial Study/Mitigated Negative Declaration

1. **Project Title:** Tule River Tribe Complete Streets and Two Pedestrian Bridges Project

Lead Agency: City of Porterville
291 North Main Street
Porterville, CA 93257-3737
Contact Person:
Sarah Weaver, Project Manager
Engineering & Project Management
Phone Number: (559) 827-2433

2. **Applicant:** City of Porterville
Same as above

3. **Contact Person:** Stacy Weaver
Same as above

4. **Project Location:** On the Tule River Indian Tribe of California Reservation, generally along No. Reservation Road between Cow Mountain Road and Million Dollar Bridge. The Project is generally located in the Village Area, which is the community and civic center of the Tule River Reservation and comprises of uses such as the Tribal Education Center, Gymnasium, Community Health Clinic, Tribal Council, Justice Center, Cow Mountain Daycare Center, Towanits Elementary School. Residents access the area from the surrounding residences by walking, cycling, or vehicles. See item 7. Project Description for additional details.

5. **General Plan Designation:** N/A

6. **Zoning Designation:** N/A

7. **Project Description:** As noted earlier, the Project is generally a pedestrian bridge and project. Following is a list of the Project's components:

    1. Replacement of the existing pedestrian swinging bridge.
    2. A new pedestrian bridge to connect Cow Mountain Road and the corridor to the Justice Center.
    3. Class 1 trail.
    4. Approximately 3,765 SF of concrete sidewalk.

5. Seven (7) accessible curb ramps.
6. Two (2) streetlights for the N. Reservation Road corridor.
7. Eight (8) new solar-powered Rectangular Rapid Flashing Beacons (RRFBs) (4 locations; 2 RRFBs assumed per location).
8. Two (2) raised pedestrian crossings.
9. Reconfiguration of back-in-angled parking stalls.
10. Landscaping and irrigation for the length of the project.
11. Signing and pavement delineation for the corridor, including pedestrian bridges.

8. Surrounding Land Uses and Settings:

South:

- Existing Land Use: Justice Center, Elders Center, Fire Department, Public Works Department, scattered residences
- Zoning: N/A
- General Plan Designation: N/A

North:

- Existing Land Use: Tribal Administration, Housing Authority, Health Center, Gymnasium, School, Day Care Facility, scattered Residences
- Zoning: N/A
- General Plan Designation: N/A

East and West:

- N/A as the Project generally follows a linear course along No. Reservation Road and an existing pedestrian bridge (to be replaced as part of the Project).

9. Required Approvals: The following discretionary approvals are required for the proposed Project. It should be noted that this list is not exhaustive and additional permits and approvals may also be required:

- San Joaquin Valley Air Pollution Control District (SJVAPCD)
    - Approval of the Dust Control Plan
    - Compliance with Regulation VIII, Rules 3135, 4101, 9510, and others as determined by the SJVAPCD
- Central Valley Regional Water Quality Control Board
    - Approval of the Stormwater Pollution Prevention Plan
- California Department of Fish and Wildlife
    - Streambed Alteration Agreement

10. Native American Consultation: AB 52 requires the lead agency to notify tribes that have previously indicated they are traditionally and culturally affiliated with that geographic area regarding their expertise concerning tribal cultural resources. As part of the process of identifying tribal cultural resources in or near the Project Site, the City sent a letter on March 9, 2026, inviting the seven (7) local Tribes (10 representatives) to consult with the City regarding this Project. The 30-day response window has closed and one (1) response or

request for consultation has been received to date (April 18, 2026). As required by AB 52, the Tribal Consultation process will be completed prior to consideration of adoption of the mitigated negative declaration document.

Abbreviations/Acronyms

AAQS	Ambient Air Quality Standards
AB	Assembly Bill
AFY	Acre Feet per Year
AIA	Air Impact Assessment
ACLUP	Airport Compatibility Land Use Plan
APCD	Air Pollution Control District
AQMD	Air Quality Management District
ARB	Air Resources Board
ATP	Active Transportation Plan
AWIA	America's Water Infrastructure Act of 2018
BMP	Best Management Practices
CAA	Federal Clean Air Act
CARB	California Air Resources Board
CAFE	Corporate Average Fuel Economy
CalEEMOD	California Emissions Estimator Model
CalOES	California Office of Emergency Services
Caltrans	California Department of Transportation
CBC	California Building Code
CCID	Central California Irrigation District
CCR	California Code of Regulations
CDFG	California Department of Fish and Game
CEQA	California Environmental Quality Act
CFC	California Fire Code
CFR	Code of Federal Regulations
CHP	California Highway Patrol
CHRIS	California Historic Resources Information System
CRHR	California Register of Historical Resources
CNDDB	California Natural Diversity Database
CNEL	Community Noise Equivalent Level
CNPS	California Native Plant Society
CO	Carbon Monoxide
CPUC	California Public Utilities Commission
CVRWQCB	Central Valley Regional Water Quality Control Board
CSO	Community Service Officer
CUWP	California Urban Water Plan
CWA	Clean Water Act
dB	Decibel
dBA	A-weighted decibel scale
DOC	California Department of Conservation
DPM	Diesel Particulate Matter
DTSC	Department of Toxic Substances Control
DWR	Department of Water Resources
EIA	Energy Information Administration
EMFAC	Emissions Modeling Factors model
EMS	Emergency Medical Services

EOP	Emergency Operations Plan
EPA	Environmental Protection Agency
FEMA	Federal Emergency Management Agency
FHWA	Federal Highway Administration
FLETC	Federal Law Enforcement Training Center
FMMP	Farmland Mapping and Monitoring Program
GAMAGI	Guidance for Assessing and Mitigating Air Quality Impacts
GHG	Greenhouse Gases
GIS	Geographic Information System
GSP	Groundwater Sustainability Plan
HABS/HAER	Historic American Building Survey/Historic American Engineering Record
Hz	Hertz
HMBP	Hazardous Materials Business Plans
HSC	Health and Safety Code
HVAC	Heating, Ventilation, and Air Conditioning
IS/MND	Initial Study/Mitigated Negative Declaration
IRWMP	Integrated Regional Water Management Plan
ISR	Indirect Source Review
LAFCO	Tulare County Local Agency Formation Commission
Leq	Equivalent Continuous Noise Level
Ldn or DNL	Day-Night Sound Level
LID	Post Construction Stormwater Low Impact Development Standards Plan
LOS	Level of Service
Lmax	Maximum noise level
LRA	Local Responsibility Area
TCAG	Tulare County Association of Governments
MCL	Maximum Contaminant Level
MJ-LHMP	Tulare County Local Multi-Jurisdictional Local Hazard Mitigation Plan
MPO	Metropolitan Planning Organization
MWELO	Model Water Efficient Landscape Ordinance
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NFIP	National Flood Insurance Program
NPDES	National Pollution Discharge Elimination System
NOD	Notice of Determination
NOI	Notice of Intent
NRHP	National Register of Historic Places
NPDES	National Pollutant Discharge Elimination System
OPR	State of California Governor's Office of Planning and Research
OSHA	Occupational Safety and Health Administration
O3	Ozone
PM10	Particulate Matter less than 10 microns
PM2.5	Particulate Matter less than 2.5 microns
PPC	Public Protection Classification
PPV	Peak Particle Velocity
PRC	Public Resources Code
RCRA	Resource Conservation and Recovery Act
ROW	Right-of-Way

RATP	Regional Active Transportation Plan
RRFB	Rectangular Rapid Flashing Beacon
RTPA	Regional Transportation Planning Agency
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
RWQCB	Regional Water Quality Control Board
SB	California Senate Bill
SCE	Southern California Edison
SGMA	Sustainable Groundwater Management Act
SJVAB	San Joaquin Valley Air Basin
SJVAPCD	San Joaquin Valley Air Pollution Control District
SOI	Sphere of Influence
SR	State Route
SSMP	Sewer System Management Plan
STCETRCMP	Sustainable/Circulation Element for the Tule River Comprehensive Master Plan
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resource Control Board
TAC	Toxic Air Contaminant
TCAG	Tulare County Association of Governments
TCR	Tribal Cultural Resource
TIA	Traffic Impact Analysis
TISG	Transportation Impact Study Guide
TRFD	Tule River Fire Department
TRTPD	Tule River Tribal Police Department
USGS	United States Geological Survey
USEPA	United States Environmental Protection Agency
USDOT	United States Department of Transportation
VMT	Vehicle Miles Traveled
WDRs	Waste Discharge Requirements
WSA	Water Supply Assessment
WMP	Water Master Plan
WWTF	Wastewater Treatment Facility
WWTP	Wastewater Treatment Plant

3.3 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 reference 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 impact.
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 if 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:
    - Earlier Analysis Used. Identify and state where they are available for review.
    - 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.
    - Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated." Describe and mitigation measures which 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.

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

DETERMINATION: (To be completed by the Lead Agency) Where potential impacts are anticipated to be significant, mitigation measures will be required, so that impacts may be avoided or reduced to insignificant levels.

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

SIGNATURE	DATE
	City of Porterville
PRINTED NAME	LEAD AGENCY

3.5 Environmental Analysis

The proposed Project (Project or project) predominantly consists of two new pedestrian bridge crossings (see section 3.2.7 Project Description for additional project components). In summary, the Project would provide safe routes for Tribe pedestrians to cross the Tule River and north Reservation Road to access an education center and gymnasium (and other governance and commercial uses within an area known as "The Village") via pedestrian enhancements.

The Tule River Indian Tribe of California (Tule River Indian Tribe or Tribe) Reservation is a federally recognized tribe of Native Americans. As a U.S. federally recognized Tribal nation and trustee of the U.S., the Tribe has sovereignty within the Tule River Tribe Reservation area. The Tule River Tribe is required to comply with federal and state law, but is not subject to other local jurisdiction's laws (for example, the County of Tulare or City of Porterville). However, the Tule River Tribe, of its own volition, can enter into a Memorandum of Agreement, Memorandum of Understanding, or other mechanisms in cooperation with local governments such as the Porterville Unified School District, the County of Tulare through the Tulare Multi-Jurisdictional Local Hazard Mitigation Plan, and the City of Porterville. Cal Trans is providing funding it receives from the federal government for this Active Transportation Plan (ATP) project, which also requires completion of the CEQA process. Subsequently, the City of Porterville is acting as the CEQA Lead Agency to complete the CEQA process for this Project.

The following section evaluates the impact categories and questions in the checklist and identifies mitigation measures, if applicable. It is noted that this IS/MND will also rely on information (e.g., plans, programs, policies, studies, statistics, etc.) of previously completed (and in some instances adopted) documents such as: Recommendation to Improve Pedestrian Safety on the Tule River Indian Reservation (Sept. 2015); Tule River Tribal Transportation Safety Assessment (T2SA 2016); 2018 Sustainable Transportation/Circulation Element (ST/CE) of Tule River Comprehensive Master Plan; Tulare County Association of Governments (TCAG) Regional Active Transportation Plan ((RATP) 2016, 2017, 2020); 2018 and 2022 Tulare County Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS); Tule River Indian Reservation ATP plan (December 2022); California Transportation Plan 2050 (CTP 2021); 2023 Tulare County Local Multi-Jurisdictional Hazard Mitigation Plan ((MJHMP) Update; and Statewide Integrated Traffic Records System (SWITRS). The discussions regarding Environmental Setting, Regulatory Setting, CEQA requirements, resource discussions, etc.; contained in the above noted documents are incorporated by reference herein in their entirety. It is noted that not all goals and policies for a particular resource will specifically apply to the Project, as such only those applicable to the Project have been included in the regulatory setting discussions. Where necessary, and if available, additional technical studies and/or site-specific facts, data, information, etc., for a particular CEQA resource item are included in this discussion.

I.AESTHETICS

Would the Project result in:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less than Significant Impact	No Impact
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 state scenic highway?	☐	☐	☐	☑
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the Site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point). If the Project is in an urbanized area, would the Project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☑	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☑	☐

Environmental Setting

Figure 2-3, shows that the Project site is predominantly surrounded by uses such as the Justice Center, Elders Center, Fire Department, Public Works Department) and scattered residential uses to the north; and Tribal Administration, Housing Authority, Health Center, Gymnasium, Towanits K-5 Elementary School, Day Care Facility, and scattered residential uses to the south. The Project's length is located within and near "The Village" area of the Tule River Reservation (which serves as a town-center area) where the majority of the Project will occur and South Reservation Road south of the river. Figure 2-3 shows that the proposed Project site is along a narrow naturally formed valley of the South Fork of the Tule River (Tule River) and is generally on uneven land adjacent to the river, and hillsides rising east of Indian Reservation Drive. Areas within approximately 0.25 miles of the Project site include scattered residences spread within hills. Generally, the undeveloped hillsides of the Sierra Nevada Mountains dominate the immediate surrounding areas.

Regulatory Setting

Federal

None that apply to the Project.

State

State Scenic Highways

The State Scenic Highway Program is implemented by the California Department of Transportation (Caltrans) and was developed to preserve the aesthetic quality of certain highway corridors. Highways included in this program are designated as scenic highways. A highway is designated as scenic based on how much of the natural landscape is visible to travelers, the quality of that landscape, and the extent to which development obstructs views of the landscape. As applicable to CEQA, there are no designated State Scenic Highways or highways that are eligible for designation within the Tule River Reservation.

Local

As noted in TCAG's 2018 RTP/SCS, "The Tule River Tribe has an established reservation within Tulare County. The Tule River Reservation was established by Executive Order of President Ulysses S. Grant on January 9, 1873. The Tule River Indian Reservation is estimated to cover around 85 square miles of the foothill region in Tulare County. The reservation is located in a rural area approximately 20 miles east of Porterville. The reservation is accessible only by one winding paved road. As seen in Table 4.5-1 [of the 2018 RTP/SCS], a list of historical resources in the County includes the First Tule River Indian Reservation (California Historical Landmark No. 473) established in 1873 and located in Porterville, before it was moved to its present location." (see page 4.5-5 of the 2018 RTP/SCS). On October 29, 2025, California Governor Gavin Newsome announced the return of 17,030 acres of ancestral land to the Tule River Indian Tribe.**Local**

None that apply to the Project as the Project will not be intrusive to aesthetics within the Project site or surrounding areas. However, the Project will include aesthetic features to preserve the natural viewscape and also comply with visibility standards to protect pedestrians along the planned trail, road crossings, pedestrian bridges, and other components of the Project. Project components such as lighting; signage; streetscapes; pedestrian crossing facilities, etc., would not intrude upon the existing or natural landscape of the area.

Discussion

a) Would the Project have a substantial adverse effect on a scenic vista?

No Impact: A scenic vista is defined as a viewpoint that provides expansive views of highly valued landscapes for the benefit of the general public. The Sierra Nevada Mountains are the primary scenic vista within this region. The Project is located within the lower elevations (foothills) of the Sierra Nevada Mountains.

As noted earlier, the Project Site is located within a natural occurring valley of the South Fork of the Tule River (Tule River). Design features of the Project will enhance safety and would include landscaping that would also enhance the pedestrian walking experience yet still incorporate visible yet non-intrusive safety features (e.g., signage, striping, lighting).

As such, based on the analysis and information provided herein, the Project would not obstruct or degrade any designated scenic vistas and there would be *no impact.*

Mitigation Measures: None Required.

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

No Impact: There are no officially designated State Scenic Highways (Scenic Highway) within the Tule River Reservation, as such, there are no designated Scenic Highways within the Project boundary. Additionally, the Project Site is currently utilized as existing urban-type environment that includes mixed uses of Tribal governance, elementary school, residential uses, and roadways. No scenic resources such as significant trees, rock outcroppings, or historic buildings are located within the Project's boundary.

Mitigation Measures: None Required.

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

Less Than Significant Impact: The Project Site is located near, and part of the Village (a de facto town center), as it would provide essential and enhanced accessibility and safety features. Its design would not contribute to a decline of the existing visual character or quality of the Project area or its surroundings. Rather, the design character of the pedestrian facilities (e.g., pedestrian crosswalks and signage) would be installed using Manual on Uniform Traffic Control Devices for Streets and Highways (MUTCD) standards, sign design details, and supporting graphics (accessed MUTCD standards at: https://mutcd.fhwa.dot.gov/index.htm). The MUTCD, which has been administered by the Federal Highway Administration (FHWA) since 1971, is a compilation of national standards for all traffic control devices, including road markings, highway signs, and traffic signals. It is updated periodically to accommodate the nation's changing transportation needs and address new safety technologies, traffic control tools, and traffic management techniques. States are required to adopt the National MUTCD as their legal standards for traffic control devices. As this Project would be funded by Caltrans, the MUTCD standards would be applied to crosswalks, signage, bicycle facilities, etc. Also, as the Project would result in no land use

changes other than the pedestrian, cyclist, and other safety enhancements, the Project would not conflict with existing zoning.

The Project design is required to adhere to the MUTCD standards. Landscaping, building materials, and architectural styles would be consistent with the existing Village character and Tribal considerations while providing visible and effective detail to protect pedestrians and cyclists utilizing the safety enhancements of the Project. Therefore, based on the analysis and information provided herein, the Project would not conflict with applicable zoning or regulations governing scenic quality and would result in a *less than significant impact.*

Mitigation Measures: None Required.

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

Less Than Significant Impact: The Project would introduce new, minimal street lighting sources on the Project Site that would provide sufficient illumination during the evenings to enhance pedestrian safety. These lighting installations would be necessary for safety and functionality.

Project lighting would comply with Caltrans' lighting standards to minimize light spillover, glare, and skyglow. Lighting design standards are intended to reduce light pollution, undesired glare, and encourage quality lighting designs. Maximum height of ground-mounted luminaries on all pedestrian walkways are not anticipated to exceed a maximum height of 20 feet and sufficient foot-candles to provide effective illumination without contributing to or creating a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

Therefore, based on the analysis and information provided herein, the Project would result in a *less than significant impact.*

Mitigation Measures: None Required.

Mitigation Measures: None Required.

Based on the analysis and information provided herein, and implementation of existing standards/designs (e.g., MUTCD standards), *no mitigation measures would be required*.

Cumulative Impact: Less Than Significant

The cumulative impact is limited to the Tule River Tribe Reservation area, specifically, along the Project's limitations for the enhanced and new pedestrian and cyclist facilities. The proposed

Project is not subject to General Plan goals, policies, and actions and would not be subject to zone classifications as it is intended to enhance pedestrian and cyclists' safety. The Project would not have a substantial adverse effect on a scenic vista; it would not substantially damage scenic resources, (including, but not limited to, trees, rock outcroppings, and historic buildings within state scenic highway); and it would not degrade the existing visual character or quality of the Site and its surroundings. The Project would not conflict with applicable zoning and other regulations governing scenic quality and it would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. Therefore, based on the analysis and information provided herein, the proposed Project would not result in a cumulatively considerable impact on aesthetic resources and cumulative impacts would be *less than significant*.

II. AGRICULTURE AND FOREST RESOURCES:

Would the Project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less than Significant Impact	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☑
b) Conflict with existing zoning for agricultural use, or a Williamson Act Contract?	☐	☐	☐	☑
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned timberland Production (as defined by Government Code section 51104(g)?	☐	☐	☐	☑
d) Result in the loss of forestland 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 forestland to non-forest use?	☐	☐		☑

Environmental Setting

Agriculture is a vital component of Tulare County economy and is a significant source of the County-wide and many Cities' cultural identity. As such, preserving the productivity of agricultural lands is integral to maintaining the overall culture and economic viability of the County.

However, the Project is not located within agricultural areas nor is it suitable for viable agricultural productivity due to its location, existing physical environment, soil types, and other factors. Also, the intent of the Project would have no impact to any agricultural-related activities as it can be summarized as a pedestrian focused project to enhance safety through improvements and other safety-oriented components. The Project site is not under a Williamson Act contract and is designated as "Non-Agricultural and Natura Vegetation" by the Department of Conservation's Farmland Mapping and Monitoring Program. The Project Site is not currently used for agricultural operations.

Regulatory Setting

Federal

None that apply to the Project.

State

California Farmland Mapping and Monitoring Program (FMMP)

The FMMP is implemented by the California Department of Conservation (DOC) to conserve and protect agricultural lands within the State. The land included in this program is based on soil type, annual crop yields, and other factors that influence the quality of farmland. The FMMP mapping categories for the most important statewide farmland are as follows, defined by the DOC:

- ***Prime Farmland*:** Farmland with the best combination of physical and chemical features able to sustain long-term agricultural production. Prime farmland has the soil quality, growing season, and moisture supply needed to produce sustained high yields. Land must have been used for irrigated agriculture production at some time during the four years prior to the mapping date.

- ***Farmland of Statewide Importance*:** Is similar to Prime Farmland, but with minor shortcomings, such as steeper slopes or less ability to store soil moisture. Land must have been used for irrigated agricultural production at some time during the four years prior to the mapping date.

- ***Unique Farmland*:** Consists of lesser quality soils used for the production of the State's leading agricultural crops. This land is usually irrigated, but may include non-irrigated orchards or vineyards as found in some climatic zones in California. Land must have been farmed at some time during the four years prior to the mapping date.

- ***Farmland of Local Importance*:** Land of importance to the local agricultural economy as determined by each county's board of supervisors and a local advisory committee. In some counties, Confined Animal Agriculture facilities are part of Farmland of Local Importance but they are shown separately.

- ***Grazing Land*:** Is the land on which the existing vegetation is suited to the grazing of livestock suitable for grazing livestock.

- ***Urban and Built-up Land*:** Is occupied by structures with a building density of at least 1 unit to 1.5 acres, or approximately 6 structures to a 10-acre parcel. This land is used for residential, industrial, commercial, construction, institutional, public administration, railroad and other transportation yards, cemeteries, airports, golf courses, sanitary landfills, sewage treatment, water control structures, and other developed purposes.

However, as the Project would not be on existing or previously productive agricultural land, the FMMP classifications do not apply to the Project. Lastly, the 2020 FMMP shows the entire Tule River Reservation as "Non-Agricultural and Natural Vegetation" (2020 Rulal Land Mapping Editions Tulare County Important Farmland 2020).

Local

The Tulare County General Plan contains numerous goals and policies to minimize conversion of agricultural lands, the majority apply to areas remaining within unincorporated areas rather than incorporated areas. However, as the Project lies entirely within the Tule River Reservation, and specifically, as the Project would not impact any agricultural lands, there are no applicable local agricultural plans or programs that would apply to the Project.

Discussion

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

No Impact: As noted earlier, the Project Site has not and does not contain agriculturally productive lands. The currently built environment contains commercial, residential, and Tribal governance structures, roadways, and other non-agricultural uses. Areas adjacent to the Project include riparian habitat, as such, the FMMP does not apply to those areas. The riparian habitat areas would be minimally disturbed to the extent possible during replacement of an existing pedestrian bring and during construction-related activities of the new pedestrian bridge.

Therefore, based on the analysis and information provided herein, the Project would result in *no impact.*

Mitigation Measures: None Required.

b) Would the Project conflict with existing zoning for agricultural use, or a Williamson Act Contract?

No Impact: The Project site is not zoned for agricultural use nor is the Project site under an active Williamson Act contract. As noted earlier, agricultural zoning classifications do not apply to the Project as it is entirely located with the Tule River Reservation. Therefore, based on the analysis and information provided herein, the Project would not conflict with existing zoning for agricultural use or a Williamson Act contract, and *no impact* would occur.

Mitigation Measures: None Required.

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

No Impact: The Project site would not conflict with existing zoning for forest land (as defined in Public Resources Code (PRC) section 12220(g)), timberland (as defined by PRC section 4526), or Timberland Production (as defined by Government Code section 51104(g). There is no forest land located on the Project Site, and the Project does not involve any activities related to forestry resources. Therefore, based on the analysis and information provided herein, there would be *no impact*.

Mitigation Measures: None Required.

d) Would the Project result in the loss of forestland or conversion of forest land to non-forest use?

No Impact: The Project site does not contain any forestland as defined under PRC section 12220(g) or by Government Code (GC) section 51104. As noted earlier, the currently built environment contains commercial, residential, and Tribal governance structures, roadways, and other non-agricultural uses. Areas adjacent to the Project include riparian habitat which are not forestland as defined by PRC section 12220(g) or GC section 51104. As such, the Project would not result in the loss of forestland or the conversion of forest land to non-forest use. Therefore, based on the analysis and information provided herein, there would be *no impact*.

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

No Impact: As noted earlier, the currently built environment contains commercial, residential, and Tribal governance facilities, roadways, and other non-agricultural uses. Areas adjacent to the Project include riparian habitat. The FMMP criteria does not apply to the Project and due to the absence of Farmland and forestland, the Project would not impact these resources. Also as noted earlier, the FMMP classifies the entire Tule River Reservation as "Non-Agricultural and Natural Vegetation" as it is not considered agricultural in nature. As such, the Project would not directly (or indirectly) induce the conversion of adjacent Farmland to non-agricultural uses

Therefore, based on the analysis and information provided herein, the impact would be *no impact.*

Mitigation Measures: None Required.

Mitigation Measures: None Required.

Based on the analysis and information provided herein, *no mitigation measures would be required*.

Cumulative Impact: No Impact.

The cumulative impact is limited to the Tule River Tribe Reservation area, specifically, along the Project's limitations for the enhanced and new pedestrian and cyclists facilities. The proposed Project is not subject to General Plan goals, policies, and actions and would not be subject to zone classifications applicable to agriculture. As noted earlier, the Project is intended to enhance pedestrian and cyclists' safety. As the Project area does not have any agricultural lands within the Project bounds, it would not result in any impact to the Agricultural resource. Therefore, based on the analysis and information provided herein, the proposed Project would result in *no cumulative impact*.

III. AIR QUALITY

Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the Project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☑	☐
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable Federal or state ambient air quality standard?	☐	☐	☑	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☑	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☑	☐

Qualified consultants Core Environmental Consulting, LLC., prepared the *"Technical Report Health Risk Assessment for Tule Active Transportation Plan Phase I"* (HRA Report) project which is used to provide technical expertise support regarding air quality, greenhouse gas, and health risk assessment items of this MND. The HRA Report is included in its entirety as Appendix A of this MND. Where necessary, and if available, additional site-specific facts, data, information, etc., are included in this discussion.

Environmental Setting

San Joaquin Valley Air Basin

The Project lies in eastern Tulare County, within the San Joaquin Valley Air Basin. The San Joaquin Valley Air Basin is bordered by the Sierra Nevada Mountains to the east, Coastal Ranges to the west, and the Tehachapi Mountains to the south. These mountain ranges restrict air movement and prevent the dispersal of pollution in the Valley below.

The San Joaquin Valley Air Pollution Control District (SJVAPCD or Air District) is comprised of the San Joaquin, Stanislaus, Merced, Madera, Fresno, Kings, and Tulare counties and the Valley

portion of Kern County and has jurisdiction over most air quality matters in the San Joaquin Valley Air Basin (SJVAB). Due to topographic features and the prevalence of agriculture in the region, the San Joaquin Valley Air Basin has one of the most severe air pollution problems in the State of California and the nation. Air pollution is hazardous to health, reduces visibility, degrades or soils materials, and can damage native vegetation. State and national ambient air quality standards were created to protect health and welfare, and to minimize other impacts. The ambient air quality standards are outlined in the Regulatory Setting section.

As noted in the HRA Report, "Area and stationary sources within SJVAB are under the jurisdiction of the San Joaquin Valley Air Pollution Control District (SJVAPCD). An overview of important air pollutants, and SJVPACD roles in controlling them, is provided in the SJVAPCD Guidance for Assessing and Mitigating Air Quality Impacts (GAMAQI), along with in-depth discussions on the meteorology and geography that contribute to unhealthy levels of air pollution. This HRA focuses on Toxic Air Contaminants (TAC)." (HRA Report, page 6)

Air Pollutants of Concern

Criteria air pollutants are defined as pollutants for which the federal and state governments have established ambient air quality standards for outdoor concentrations. The federal and state standards have been set at levels above which concentrations could be harmful to human health and welfare. These standards are designed to protect the most sensitive persons such as children, pregnant women, and the elderly, from illness or discomfort. Criteria air pollutants include ozone (O3), nitrogen dioxide (NO2), carbon monoxide (CO), sulfur dioxide (SO2), particulate matter 2.5 microns or less in diameter (PM2.5), particulate matter ten microns or less in diameter (PM10), and lead (Pb). Note that reactive organic gases (ROGs), which are also known as reactive organic compounds (ROCs) or volatile organic compounds (VOCs), and nitrogen oxide (NOx) are not classified as criteria pollutants. However, ROGs and NOx are widely emitted from land development projects and participate in photochemical reactions in the atmosphere to form O3; therefore, NOx and ROGs are relevant to the proposed Project and are of concern in the air basin and are listed below along with the criteria pollutants. As shown in Table 3-1, the SJVAB is in nonattainment for several pollutant standards.

<u>Ozone</u>

Ozone is not emitted directly into the environment but is generated from complex chemical reactions between reactive organic gases (ROG), or non-methane hydrocarbons, and oxides of nitrogen (NOX) that occur in the presence of sunlight. ROG and NOX generators in Tulare County include motor vehicles, recreational boats, other transportation sources, and industrial processes.

<u>PM10</u>

PM10, or particulate matter, is a complex mixture of primary or directly emitted particles, and secondary particles or aerosol droplets formed in the atmosphere by precursor chemicals.

Carbon Monoxide

Carbon Monoxide (CO) is a colorless, odorless, and poisonous gas produced by incomplete burning of carbon in fuels. When CO enters the bloodstream, it reduces the delivery of oxygen to the body's organs and tissues. Health threats are most serious for those who suffer from cardiovascular disease, particularly those with angina or peripheral vascular disease. Exposure to elevated CO levels can cause impairment of visual perception, manual dexterity, learning ability and performance of complex tasks. The primary source of carbon monoxide is automobile use.

Nitrogen Dioxide

Nitrogen Dioxide (NO2) is a brownish, highly reactive gas that is present in all urban atmospheres. NO2 can irritate the lungs, cause bronchitis and pneumonia, and lower resistance to respiratory infections. Nitrogen oxides are an important precursor both to ozone (O3) and acid rain and may affect both terrestrial and aquatic ecosystems.

The major mechanism for the formation of NO2 in the atmosphere is the oxidation of the primary air pollutant nitric oxide (NO). NO2 plays a key role, together with VOCs, in the atmospheric reactions that produce O3. NO2 forms when fuel is burned at hot temperatures. The two major emission sources are transportation and stationary fuel combustion sources such as electric utility and industrial boilers.

Sulfur Dioxide

Sulfur Dioxide (SO2) affects breathing and may aggravate existing respiratory and cardiovascular disease in high doses. Sensitive populations include asthmatics, individuals with bronchitis or emphysema, children, and the elderly. SO2 is also a primary contributor to acid deposition, or acid rain, which causes acidification of lakes and streams and can damage trees, crops, historic buildings, and statues. In addition, sulfur compounds in the air contribute to visibility impairment in large parts of the country. This is especially noticeable in national parks. Ambient SO2 results largely from stationary sources such as coal and oil combustion, steel mills, refineries, pulp, and paper mills and from nonferrous smelters.

Table 3-1: San Joaquin Valley Attainment Status

Pollutant		
	Federal Standards	**State Standards**
Ozone – One hour	No Federal Standard[f]	Nonattainment/Severe
Ozone – Eight hour	Nonattainment/Extreme[e]	Nonattainment
PM 10	Attainment[c]	Nonattainment

Table 3-1: San Joaquin Valley Attainment Status		
Pollutant		
	Federal Standards	**State Standards**
PM 2.5	Nonattainment[d]	Nonattainment
Carbon Monoxide	Attainment/Unclassified	Attainment/Unclassified
Nitrogen Dioxide	Attainment/Unclassified	Attainment
Sulfur Dioxide	Attainment/Unclassified	Attainment
Lead (Particulate)	No Designation/Classification	Attainment
Hydrogen Sulfide	No Federal Standard	Unclassified
Sulfates	No Federal Standard	Attainment
Visibility Reducing Particles	No Federal Standard	Unclassified
Vinyl Chloride	No Federal Standard	Attainment

[a] See 40 CFR Part 81
[b] See CCR Title 17 Sections 60200-60210
[c] On September 25, 2008, EPA redesignated the San Joaquin Valley to attainment for the PM10 National Ambient Air Quality Standard (NAAQS) and approved the PM10 Maintenance Plan.
[d] The Valley is designated nonattainment for the 1997 PM2.5 NAAQS. EPA designated the Valley as nonattainment for the 2006 PM2.5 NAAQS on November 13, 2009 (effective December 14, 2009).
[e] Though the Valley was initially classified as serious nonattainment for the 1997 8-hour ozone standard, EPA approved Valley reclassification to extreme nonattainment in the Federal Register on May 5, 2010 (effective June 4, 2010).
[f] Effective June 15, 2005, the U.S. Environmental Protection Agency (EPA) revoked the federal 1-hour ozone standard, including associated designations and classifications. EPA had previously classified the SJVAB as extreme nonattainment for this standard. EPA approved the 2004 Extreme Ozone Attainment Demonstration Plan on March 8, 2010 (effective April 7, 2010). Many applicable requirements for extreme 1-hour ozone nonattainment areas continue to apply to the SJVAB.

Source: SJVAPCD

Ambient Air Quality

Ambient air quality in Tule River Reservations can be inferred from ambient air quality measurements conducted at the nearest air quality monitoring station located in Porterville, CA. Existing levels of ambient air quality and historical trends and projections in the vicinity of Porterville are documented by measurements made by the SJVAPCD, which also maintains air quality monitoring stations which process ambient air quality measurements.

The purpose of the monitoring station is to measure ambient concentrations of pollutants and determine whether ambient air quality meets the National Ambient Air Quality Standards (NAAQS) and the California Ambient Air Quality Standards (CAAQS). Ozone and particulate matter (PM10 and PM2.5) are pollutants of particular concern in the SJVAB. The monitoring station located closest to the proposed Project site and most representative of air quality near the proposed Project site are in Porterville, which is approximately 14 miles northwest of the Project site. Ambient emission concentrations vary due to localized variations in emissions sources and climate and should be considered "generally" representative of ambient concentrations near the Project site. Criteria air pollutant concentrations are measured at several monitoring stations in the SJVAB which are used for measuring the localized concentration of various air pollutants across the SJVAB. The data from these stations is used to monitor exceedances for certain criteria pollutants as well as giving a snapshot of ambient air quality across the SJVAB. The Newcomb Street station located in the City of Porterville is the closest and most representative station to the project area with recent data for ozone. Because no PM10 and PM2.5 concentrations are collected at the Newcomb Street station, measured

concentrations from the next closest station, the Visalia-N Church Street station located in the City of Visalia, was used. Table 3-2 summarizes the air quality data from a recent 3-year period (2020–2022)

Air monitoring data can be found on the California Air Resources Board website at: https://arb.ca.gov/adam/trends/trends1.php. California and National Air Quality Standards has been included in Table 3-2, California and National Ambient Air Quality Standards.

Table 3-2: Ambient Air Quality Standards

Pollutant	Averaging Time	California Standards	National Standards	
		Concentration[3]	Primary	Secondary
Ozone (03)	1 Hour	0.09 ppm (180 µg/m³)	--	Same as Primary Standard
	8 Hour	0.070 ppm (137 µg/m³)	0.075 ppm (147 µg/m³)	
Respirable Particulate Matter (PM_{10})	24 Hour	50 µg/m	150 µg/m³	Same as Primary Standard
	Annual Arithmetic Mean	20 µg/m3	--	
Fine Particulate Matter ($PM_{2.5}$)	24 Hour	--	35 µg/m³	Same as Primary Standard
	Annual Arithmetic Mean	12 µg/m³	15 µg/m³	
Carbon Monoxide (CO)	1 Hour	20 ppm (23 mg/m³)	35 ppm (40 mg/m³)	--
	8 Hour	9.0 ppm (10 mg/m³)	9 ppm (10 mg/m³)	--
	8 Hour (Lake Tahoe)	6 ppm (7 mg/m³)	--	--
Nitrogen Dioxide (NO_2) [8]	1 Hour	0.18 ppm (339 µg/m³)	100 ppb (188 µg/m³)	--
	Arithmetic Mean	0.030 ppm (57 µg/m³)	53 ppb (100 µg/m³)	Same as Primary Standard
Sulfur Dioxide	1 Hour	0.25 ppm (655 µg/m³)	75 ppb (196 µg/m³)	--
	3 Hour	--	--	0.5 ppm (1300 µg/m³)
	24 Hour	0.04 ppm (105 µg/m³)	0.14 ppm (for certain areas)	--
	Annual Arithmetic Mean	--	0.030 ppm (for certain areas)	--
Lead[10,11]	30 Day Average	1.5 µg/m³	--	--
	Calendar Quarter	--	1.5 µg/m3 (for certain areas)	Same as Primary Standard
	Rolling 3-Month Average	--	0.15 µg/m³	
Visibility Reducing Particles[12]	8 Hour	See Footnote 1	No National Standards	
Sulfates	24 Hour	25 µg/m³		
Hydrogen Sulfide	1 Hour	0.03 ppm (42 µg/m³)		

Table 3-2: Ambient Air Quality Standards			
Vinyl Chloride[10]	24 Hour	0.01 ppm (26 μg/m^3)	
Source: California Air Resources Board (CARB). 2016.			

Existing Ambient Air Quality Conditions

Table 3-3 summarizes air quality monitoring data for 2021 through 2023, the most recent three-year period available. Data were obtained from the closest monitoring site, Porterville-Newcomb Street monitoring station, or from the next closest sites (Visalia-Church Street for 2021; Visalia – Ashland Ave for 2022-23) for pollutants not monitored at the Porterville site. No recent data were available for CO or SO2 because monitoring is not conducted for pollutants unlikely to exceed AAQS. As such, both CO and SO2 data are not included in Table 3-3

Table 3-3 Air Quality Monitoring Summary				
Pollutant	**Data**	**2021**	**2022**	**2023**
Ozone - 1 Hour	Max 1 Hour (ppm)	0.106	0.099	0.102
	Days > State Standard (0.09 ppm)[1]	9	1	7
Ozone – 8 hour	Max 8 Hour (ppm)	0.093	0.085	0.089
	Days > National Standard (0.070 ppm)[2]	61	62	47
Nitrogen Dioxide - Annual	Annual Average (ppb)	ID	ID	7
Nitrogen Dioxide – 1 Hour	Max 1 Hour (ppb)	50.0	49.7	39.9
	Days > National Standard (100 ppb)	0	0	0
	Days > National Standard (100 ppb)	0	0	0
PM_{10} – Annual	Annual Average (μg/m^3)	51.7	43.6	39.0
PM_{10} - 24-Hour	Max 24 Hour (μg/m^3)	302.1	132.7	105.8
	Days > National Standard (150 μg/m^3)	4	0	0
	Days > State Standard (50 μg/m^3)	141	111	102
$PM_{2.5}$ - Annual	Annual Average	20.7	14.8	11.6
$PM_{2.5}$ - 24-Hour	Max 24 Hour (μg/m^3)	129.2	48.3	42.9
	Days > National Hour Standard(35 μg/m^3)	43	17	6
Notes: Standards presented are the most health-conservative of those established Ppm = parts per million Ppb = parts per billion ID = Insufficient Data 1 Federal Standard was revoked 2 State standard is the same.				

The following is excerpted from the HRA Report (see Appendix A) prepared by qualified consultants (Core), verbatim, to maintain the veracity, clarity, and accuracy of the Health Risk Assessment Setting for the Project area.

"Health Risk Assessment Setting

San Joaquin Valley Air Pollution Control District

The Project is located in the San Joaquin Valley Air Basin (SJVAB), which consists of eight counties: Fresno, Kern (western and central), Kings, Madera, Merced, San Joaquin, Stanislaus, and Tulare. Air pollution in the SJVAB can be attributed to both human-related (anthropogenic) and natural (biogenic) activities that produce emissions.

Area and stationary sources within SJVAB are under the jurisdiction of the San Joaquin Valley Air Pollution Control District (SJVAPCD). An overview of important air pollutants, and SJVPACD roles in controlling them, is provided in the SJVAPCD *Guidance for Assessing and Mitigating Air Quality Impacts*[4] (GAMAQI), along with in-depth discussions on the meteorology and geography that contribute to unhealthy levels of air pollution. This HRA focuses on Toxic Air Contaminants (TAC).

Toxic Air Contaminants (TAC), as defined by the California Health & Safety Code (CH&SC) §44321, are listed in Appendices AI and AII in AB 2588 Air Toxic "Hot Spots" and Assessment Act's Emissions Inventory Criteria and Guideline Regulation document. Potential health impacts from TACs are generally categorized into two groups: carcinogenic (cancer causing) effects and non-carcinogenic (non-cancer-causing) effects.

The non-carcinogenic effects can be further divided into long-term (chronic) health effects such as birthdefects, neurological damage, or genetic damage; and short- term (acute) effects such as eye irritation, respiratory irritation, and nausea. The California TAC list identifies about 700 plus pollutants. Carcinogenic and/or non-carcinogenic toxicity criteria have been established for a subset of these pollutants by OEHHA, as required by CH&SC §44360. TACs used in determining the potential exposure to the public should not be confused with the 189 Hazardous Air Pollutants (HAP) listed in the Clean Air Act.

SJVAPCD oversees the assessment of health risk associated with TAC emissions from new development in the SJVAB. SJVAPCD lays out a basic framework for understanding and assessing health risk, under CEQA, in the GAMAQI.

The location of a development project is a major factor in determining whether the project will result in localized air quality impacts. The potential for adverse air quality impacts increases as the distance between the source of emissions and receptors decreases. Receptors include sensitive receptors and worker receptors. Sensitive receptors refer to those segments of the population most susceptible to poor air quality (i.e., children, the elderly, and those with pre-existing serious health problems affected by air quality). Land uses where sensitive individuals are most likely to spend time include schools and schoolyards, parks and playgrounds, daycare centers, nursing homes, hospitals, and residential communities (these sensitive land uses may also be referred to as sensitive receptors). Worker receptors refer to employees and

locations where people work. Impacts on sensitive receptors are of particular concern, because they are the people most vulnerable to the effects of air pollution.

From a health risk perspective there are two types of land use projects that have the potential to cause long-term public health risk impacts:

Type A Projects: Land use projects that will place new toxic sources in the vicinity of existing receptors.
Type B Projects: Land use projects that will place new receptors in the vicinity of existing toxics sources.

Projects of either type must be assessed to determine whether the resulting health risk to sensitive receptors would exceed SJVAPCD established thresholds of significance for carcinogenic, non- carcinogenic acute, and non-carcinogenic chronic risk.

The OEHHA *Risk Assessment Guidelines* are the standards for estimating health risks. OEHHA is responsible for developing and providing toxicological and medical information relevant to decisions involving public health to state and local government agencies. Historically, state laws have required OEHHA to develop Risk Assessment Guidelines for estimating health risk associated with various sources of air pollution. Furthermore, the Children's Environmental Health Protection Act (SB 25, Escutia, 1999) requires OEHHA to biennially review risk assessment methods for air toxics, and related information, to ensure that they adequately protect infants and children.

The SJVAPCD risk management policy works in conjunction with the OEHHA *Risk Assessment Guidelines*. The SJVAPCD risk management policy further clarifies and provides guidance on the appropriate options to use, such as a longer exposure period and more conservative air dispersion modeling.

SJVAPCD staff members are considered leading statewide experts in the field of health risk assessment and have developed significant resources from guidance documents to database tools to assist other agencies, consultants, and regulated sources. Therefore, the SJVAPCD concludes that use of its risk management policy and the OEHHA *Risk Assessment Guidelines* is appropriate in determining significance within the environmental review process." (HRA, pages 6-7

"Diesel Particulate Matter (DPM)

Construction activities associated with the Project would generate emissions of diesel particulate matter (DPM) from the use of off-road diesel-fueled equipment and on-road diesel trucks. DPM has been identified as a toxic air contaminant by the California Air Resources Board (CARB) based on its potential to contribute to both carcinogenic and non-carcinogenic health effects. OEHHA has evaluated numerous human epidemiological studies on diesel exhaust

exposure, with long-term occupational studies showing increased relative risks of lung cancer among exposed populations. These studies support a causal relationship between long-term diesel exhaust exposure and cancer risk.

In addition to carcinogenic effects, long-term non-cancer health effects have been associated with chronic exposure to diesel exhaust, including increased incidence of cough, phlegm, and chronic bronchitis, as well as reductions in pulmonary function. Short-term exposures have been linked to acute respiratory symptoms such as cough, wheezing, chest tightness, and eye and nasal irritation. These findings underscore the importance of evaluating potential exposures to DPM during construction activities, particularly for nearby sensitive receptors.

Because the Project does not include any operational sources of toxic air contaminants—such as gasoline dispensing, diesel fueling, industrial processes, or stationary equipment—construction DPM is the **only** TAC source evaluated in this Health Risk Assessment. Accordingly, this HRA focuses on estimating potential cancer and non-cancer risks associated with short-term construction emissions of DPM, consistent with OEHHA and SJVAPCD guidance. " (HRA, pages 7-8)

"Ambient Air Quality

The SJVAPCD Guidance for Assessing and Mitigating Air Quality Impacts (GAMAQI) provides the framework for evaluating potential air quality impacts under CEQA. The GAMAQI includes detailed discussions of regional meteorology, geography, and pollutant sources within the San Joaquin Valley Air Basin (SJVAB), as well as the regulatory context for criteria pollutants. This technical report provides only a brief overview of ambient air quality considerations relevant to the Project; the reader is referred to the GAMAQI for additional background.

The United States Environmental Protection Agency (USEPA) has established National Ambient Air
Quality Standards (NAAQS) for six criteria pollutants, and the California Air Resources Board (CARB) has established California Ambient Air Quality Standards (CAAQS) for these and several additional pollutants. Under SJVAPCD guidance, projects must be evaluated for their potential to cause or contribute to localized exceedances of these standards.

SJVAPCD requires an Ambient Air Quality Analysis (AAQA) when project-related on-site emissions of any criteria pollutant exceed the District's 100-pound-per-day screening threshold after implementation of all enforceable mitigation measures. An AAQA uses air dispersion modeling to determine whether project emissions would cause or contribute to a violation of the applicable AAQS. For this Project, maximum daily construction emissions were compared to the 100-pound-per-day screening threshold to determine whether a full AAQA is required." (HRA, page 8)

HRA Thresholds of Significance

This HRA focuses on answering the following question from the Air Quality section of Appendix G in the *CEQA Guidelines*:

3. Would the Project expose sensitive receptors to substantial pollutant concentrations?

The *CEQA Guidelines* state that, where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make a significance determination.

SJVAPCD has established the following thresholds of significance for risk exposure to TAC:

Table 1 [of the HRA Report] SJVAPCD Thresholds of Significance – Toxic Air Contaminants

CARCINOGENS	Maximally Exposed Individual risk equals or exceeds 20 in one million
NON CARCINOGENS	**Acute**: Hazard Index equals or exceeds 1 for the Maximally Exposed Individual
	Chronic: Hazard Index equals or exceeds 1 for the Maximally Exposed Individual
Source San Joaquin Valley Air Pollution Control District; Table 1 of the HRA Report (Appendix A of this document)	

Therefore, if the calculated risk exposure from Project TAC emissions is below the SJVAPCD thresholds of significance, it can be concluded that the Project would not expose sensitive receptors to substantial pollutant concentrations and this impact would be considered less than significant under CEQA.

Ambient Air Quality Thresholds

The thresholds of significance for ambient air quality are based on the NAAQS and CAAQS. A project would be considered to have a significant impact if its emissions are predicted to cause or contribute to a violation of an ambient air quality standard by creating a localized exceedance of any of the CAAQS or any of the NAAQS and if available the associated Significant Impact Level (SIL).

The SJVAPCD Rule 9510 (Indirect Source Review) applicability thresholds, which are far more conservative than the criteria pollutant significance thresholds or the AAQA applicability threshold, can be used to screen out development projects subject to CEQA. Projects below ISR applicability thresholds (i.e., "small projects") would be expected to not violate any air quality standards or contribute substantially to an existing or projected air quality violation and will not exceed the thresholds of significance for ambient air quality. In this case, SJVAPCD concludes no emission calculation is needed and no ambient air quality analysis is required. For projects equal to or above the applicability thresholds, the District recommends that emissions from the project be quantified to determine if an AAQA is needed.

If maximum daily onsite emissions of all criteria pollutants, during construction and operation, are below 100 pounds per day, then the Project would not cause a localized exceedance of

NAAQS or CAAQS, no further AAQA is required, and the associated impact would be less than significant." (HRA, pages 9-10)

"Methodology

HRA Methodology
The potential health risks associated with toxic air contaminant (TAC) emissions from the Project were evaluated in accordance with the Office of Environmental Health Hazard Assessment (OEHHA) *Guidance Manual for Preparation of Health Risk Assessments* (2015), the San Joaquin Valley Air Pollution Control District (SJVAPCD) Policy APR 1906 – *Framework for Performing Health Risk Assessments and Guidance for Air Dispersion Modeling*, and the SJVAPCD *Guidance for Assessing and Mitigating Air Quality Impacts* (GAMAQI). These documents provide the regulatory framework for identifying TAC sources, estimating emissions, modeling dispersion, and calculating cancer and non-cancer health risks.

Because the Project does not include any operational sources of TAC, construction diesel particulate matter (DPM) is the only TAC source requiring quantitative evaluation. DPM is the particulate component of diesel exhaust and has been identified as a TAC by the California Air Resources Board (CARB) based on its carcinogenic and non-carcinogenic health effects. Long-term epidemiological studies have demonstrated increased lung cancer risks among populations with chronic occupational exposure to diesel exhaust, and both acute and chronic respiratory symptoms have been associated with short-term exposures. Construction-related DPM emissions were therefore included in the quantitative analysis described below.

Other potential TAC sources were evaluated and determined not to be present. The Project does not include gasoline dispensing, charbroilers, industrial equipment, diesel fueling, or any other stationary or area sources that would generate TAC emissions requiring quantitative HRA modeling under SJVAPCD guidance. Construction activities are the only source of TAC emissions, and all diesel particulate matter (DPM) associated with construction equipment and construction-related truck activity is captured within the CalEEMod construction emissions. The Project would not generate any new operational diesel demand, new vehicle trips, or any other operational TAC-emitting activities. Accordingly, construction DPM is the only TAC source requiring quantitative evaluation in this HRA.

Accordingly, the HRA focuses exclusively on quantifying potential cancer and non-cancer risks associated with construction DPM emissions. The analysis consisted of the following steps:

1. **Estimated TAC Emissions.** Construction emissions were estimated using the latest version of the California Emissions Estimator Model (CalEEMod). Results are provided in Appendix A. SJVAPCD considers exhaust particulate matter 10 microns and smaller (PM_{10} exhaust) to be a reasonable surrogate for DPM. The maximum (worst-year) annual DPM emissions were used for subsequent modeling. Project-specific construction details were based on the best

available information provided by 4Creeks. Where project-specific information was not available, CalEEMod default assumptions were used.

Because construction activities occur across three distinct project areas, total annual DPM emissions from the single CalEEMod run were allocated proportionately to each area based on relative disturbance acreage for use in HARP2 ADMRT. Allocation calculations are provided in Appendix A [of the HRA Report].

2. **Modeled Air Dispersion.** The U.S. Environmental Protection Agency (U.S. EPA) American Meteorological Society/EPA Regulatory Model (AERMOD) was used to model annual average downwind concentrations of DPM at nearby receptors. A normalized emission rate of one gram per second was applied to the construction area source, and meteorological data were obtained from SJVAPCD. Terrain was incorporated using AERMOD's WebGIS preprocessing tool. The construction footprints were modeled as an area source based on the Project disturbance limits (see Figure 2 [of the HRA Report]). Receptors were placed at the nearest residential and worker locations surrounding the Project site. Consistent with OEHHA and SJVAPCD guidance, indoor worker receptors within the construction zone were excluded because they are regulated under OSHA and are not considered sensitive receptors for CEQA purposes.

3. **Calculated Risk.** Normalized downwind concentrations from AERMOD were imported into the CARB Hotspots Analysis and Reporting Program (HARP2) Air Dispersion Modeling and Risk Tool (ADMRT). These concentrations were combined with the estimated DPM emissions to calculate ground-level TAC concentrations at each receptor. Cancer risk and chronic hazard index (HI) were calculated for all receptors using OEHHA-recommended exposure pathways and SJVAPCD-recommended conservative parameters. OEHHA has not established acute or 8-hour chronic Reference Exposure Levels (RELs) for DPM; therefore, acute and 8-hour chronic HI values were not calculated. Because construction DPM is the only TAC source associated with the Project, no operational TAC risks were calculated. Total Project risk is therefore equal to construction risk.

SJVAPCD recommendations were followed throughout both the AERMOD and HARP2 ADMRT analyses. Results are provided in Appendix A [of the HRA Report], along with receptor maps. Modeling files will be made available to reviewing agencies upon request [from the City of Porterville]." (HRA, pages 11-12)

"AAQA Methodology

The SJVAPCD Guidance for Assessing and Mitigating Air Quality Impacts (GAMAQI) outlines a stepwise process for determining whether a project requires a full Ambient Air Quality Analysis (AAQA). The first step is to determine whether the project is subject to SJVAPCD Rule 9510 (Indirect Source Review, ISR). If a project is exempt from ISR, it proceeds directly to the AAQA

screening step, which evaluates maximum daily onsite emissions against the District's 100-pound-per-day screening threshold.

Rule 9510 applicability was evaluated based on the definitions, applicability criteria, and exemptions provided in Sections 2.0 through 4.0 of the rule. Rule 9510 Section 2.4 establishes that transportation or transit development projects are subject to ISR only if construction exhaust emissions equal or exceed 2.0 tons of NOx or 2.0 tons of PM10. Based on the construction emissions modeling, total construction exhaust emissions of NOx and PM10 are below the Rule 9510 applicability thresholds (for transportation projects) of 2.0 tons each. These results confirm that the Project does not meet the applicability criteria in Rule 9510 Section 2.4 [of the HRA Report].

Rule 9510 Section 3.13 [of the HRA Report] defines a development project as one that results in the construction of a new building, facility, or structure, or the reconstruction of such structures for the purpose of increasing capacity or activity. The Project does not include buildings, facilities, or structures as defined in the rule, nor does it increase the capacity or activity of any existing facility. As such, the Project does not meet the definition of a development project subject to ISR.

Rule 9510 Section 3.18 [of the HRA Report] defines an indirect source as a facility or installation that attracts or generates mobile-source activity resulting in emissions of pollutants for which there is a state ambient standard. The Project does not generate new vehicle demand or attract new mobile-source activity; rather, it provides safety and accessibility improvements for existing pedestrian and bicycle travel. No new operational vehicle trips or diesel demand would be generated by the Project. Therefore, the Project does not constitute an indirect source under Rule 9510.

Rule 9510 Section 4.4.2 [of the HRA Report] provides an exemption for transportation development projects that consist solely of modifications to existing roads subject to District Rule 8061 and that are not intended to increase single-occupancy vehicle capacity. The Project consists of pedestrian and bicycle safety improvements, sidewalk infill, curb ramps, and related active transportation elements. These improvements do not increase roadway capacity, do not induce additional vehicle trips, and do not modify the roadway in a manner that would increase single-occupancy vehicle throughput. Therefore, the Project meets the exemption criteria in Section 4.4.2.1. [of the HRA Report]

Based on these considerations, the Project is exempt from SJVAPCD Rule 9510. Because the Project is exempt from ISR, the AAQA process concludes at this step. The subsequent AAQA steps—maximum daily onsite screening against the 100-pound-per-day threshold, onsite plus one-quarter-mile mobile-source adjustments, air dispersion modeling, and localized concentration analysis—are not required for this Project. " (HRA, pages 12-13)

Regulatory Setting

Federal

Federal Clean Air Act

The 1977 Federal Clean Air Act (CAA) authorized the establishment of the National Ambient Air Quality Standards (NAAQS) and set deadlines for their attainment. The Clean Air Act identifies specific emission reduction goals, requires both a demonstration of reasonable further progress and an attainment demonstration, and incorporates more stringent sanctions for failure to meet interim milestones. The U.S. EPA is the federal agency charged with administering the Act and other air quality-related legislation. EPA's principal functions include setting NAAQS; establishing minimum national emission limits for major sources of pollution; and promulgating regulations. Under CAA, the NCCAB is identified as an attainment area for all pollutants.

1990 Clean Air Act Amendment

As summarized at U.S. EPA's 1990 Clean Air Act Amendment Summary website, "In June 1989 President Bush proposed sweeping revisions to the Clean Air Act. Building on Congressional proposals advanced during the 1980s, the President proposed legislation designed to curb three major threats to the nation's environment and to the health of millions of Americans: acid rain, urban air pollution, and toxic air emissions. The proposal also called for establishing a national permits program to make the law more workable, and an improved enforcement program to help ensure better compliance with the Act." "Several progressive and creative new themes are embodied in the Amendments; themes necessary for effectively achieving the air quality goals and regulatory reform expected from these far-reaching amendments. Specifically the new law:

- encourages the use of market-based principles and other innovative approaches, like performance-based standards and emission banking and trading;
- provides a framework from which alternative clean fuels will be used by setting standards in the fleet and California pilot program that can be met by the most cost-effective combination of fuels and technology;
- promotes the use of clean low sulfur coal and natural gas, as well as innovative technologies to clean high sulfur coal through the acid rain program;
- reduces enough energy waste and creates enough of a market for clean fuels derived from grain and natural gas to cut dependency on oil imports by one million barrels/day;
- promotes energy conservation through an acid rain program that gives utilities flexibility to obtain needed emission reductions through programs that encourage customers to conserve energy." (see: https://www.epa.gov/clean-air-act-overview/1990-clean-air-act-amendment-summary)

State

California Clean Air Act

California Air Resources Board coordinates and oversees both state and federal air pollution control programs in California. As part of this responsibility, the California Air Resources Board monitors existing air quality, establishes California Ambient Air Quality Standards, and limits allowable emissions from vehicular sources. Regulatory authority within established air basins is provided by air pollution control and management districts, which control stationary-source and most categories of area-source emissions and develop regional air quality plans. The Project is located within the jurisdiction of the San Joaquin Valley Air Pollution Control District.

Regional

San Joaquin Valley Air Pollution Control District (SJVAPCD or Air District)

Regional Attainment Status

The state and federal standards for the criteria pollutants are presented in Section 8.4 of The San Joaquin Valley Unified Air Pollution Control District's 2015 "Guidance for Assessing and Mitigating Air Quality Impacts". These standards are designed to protect public health and welfare. The "primary" standards have been established to protect public health. The "secondary" standards are intended to protect the nation's welfare and account for air pollutant effects on soils, water, visibility, materials, vegetation, and other aspects of general welfare. The U.S. EPA revoked the national 1-hour ozone standard on June 15, 2005, and the annual PM_{10} standard on September 21, 2006, when a new $PM_{2.5}$ 24-hour standard was established.

CEQA requires lead agencies to determine if each Project of a certain threshold has an impact on the air quality of the area. The Air Quality standards and Greenhouse Gas guidance measures are used to establish levels of air quality impact of a Project. The following regulatory background represents global, federal, state, and local standards and guidance that have been reviewed in this study.

The SJVAPCD (Air District) is responsible for enforcing air quality standards in the Project area. The following SJVAPCD rules and regulations may apply to the proposed Project (and is not all inclusive):

- **Rule 3135:** Dust Control Plan Fee. All Projects which include construction, demolition, excavation, extraction, and/or other earth moving activities as defined by Regulation VIII (Described below) are required to submit a Dust Control Plan and required fees to mitigate impacts related to dust.
- **Rule 4101:** Visible Emissions. District Rule 4101 prohibits visible emissions of air contaminants that are dark in color and/or have the potential to obstruct visibility.

- **Rule 4102:** Nuisance. The purpose of this rule is to protect the health and safety of the public.
- **Rule 4641:** Cutback, Slow Cure, and Emulsified Asphalt, Paving and Maintenance Operations. The purpose of this rule is to limit VOC emissions from asphalt paving and maintenance operations. This rule applies to the manufacture and use of cutback asphalt, slow cure asphalt and emulsified asphalt for paving and maintenance operations.
- **Rule 9510:** Indirect Source Review (ISR). This rule reduces the impact PM10 and NOX emissions from growth on the SJVB. This rule places application and emission reduction requirements on applicable development Projects in order to reduce emissions through onsite mitigation, offsite SJVAPCD administered Projects, or a combination of the two. This Project may be subject to ISR and may be required to submit an Air Impact Assessment (AIA) application in accordance with Rule 9510's requirements.
- **Regulation VIII:** Fugitive PM10 Prohibitions. Regulation VIII is composed of eight rules which together aim to limit PM10 emissions by reducing fugitive dust. These rules contain required management practices to limit PM10 emissions during construction, demolition, excavation, extraction, and/or other earth moving activities.

Local

None that apply to this Project.

Discussion

Thresholds of Significance

The impact analysis provided in the discussion below is based on the application of the following CEQA Guidelines Appendix G, which indicates that a project would have a significant impact on air quality if it would:

1. *Conflict with or obstruct implementation of any applicable air quality plan.*
2. *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.*
3. *Expose sensitive receptors to substantial pollutant concentrations.*
4. *Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.*

The significance criteria established by the applicable air quality management or air pollution control district (i.e., SJVAPCD for the Project) may be relied upon to make the above determinations. According to the SJVAPCD, an air quality impact is considered significant if the

proposed Project would violate any ambient air quality thresholds, contribute substantially to an existing or projected air quality violation, or expose sensitive receptors to substantial pollutant concentrations. The SJVAPCD has established thresholds of significance for air quality for construction and operational activities of land use development projects, which is shown in Table 3-4 – SJVAPCD Thresholds of Significance for Criteria Pollutants.

Table 3-4: Regional Thresholds for Construction and Operational Emissions			
Pollutant/Precursor	**Construction Emissions**	**Operational Emissions**	
		Permitted Equipment and Activities	**Non-Permitted Equipment and Activities**
	Emissions (tpy)	**Emissions (tpy)**	**Emissions (tpy)**
CO	100	100	100
NOx	10	10	10
ROG	10	10	10
SOx	27	27	27
PM10	15	15	15
PM2.5	15	15	15
Source: SJVAPCD 2015. Guidance for Assessing and Mitigating Air Quality Impacts.			

SJVAPCD has also established the following thresholds of significance for risk exposure to toxic air contaminants to nearby sensitive receptors to the Project site, shown below in Table 3-5.

Table 3-5: Thresholds of Significance for Toxic Air Contaminants (TAC's)	
Carcinogens	Maximally Exposed Individual risk equals or exceeds 20 in one million
Non-Carcinogens	Acute: Hazard Index equals or exceeds 1 for the Maximally Exposed Individual
	Chronic: Hazard Index equals or exceeds 1 for the Maximally Exposed Individual
Source: SJVAPCD	

CO Hotspot Analysis

In addition to the daily thresholds listed above, the proposed Project area would also be subject to the ambient air quality standards, through an analysis of localized CO impacts. The California 1-hour and 8-hour CO standards are:

- 1-hour = 20 parts per million (ppm)
- 8-hour = 9 parts per million (ppm)

The significance of localized impacts depends on whether ambient CO levels in the vicinity of the Project site are above state and federal standards for carbon monoxide. Carbon monoxide

concentrations in the San Joaquin Air Basin currently meets the California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS) for carbon monoxide (CO).

The HRA Report prepared by qualified consultants Core Environmental Consultants (Core) included an Executive Summary that is included herein, verbatim, as it provides the reader with the overall background, methodology, and resuts contained in the HRA Report (see Appendix A). Specific impact determinations, based on the HRA Report, are provided in the discussion of III. Air Quality, Items a) - d).

"Executive Summary

This technical report has been prepared to summarize the background, methodology, and results of a Health Risk Assessment (HRA) for the Tule River Active Transportation Program (ATP) Phase I Project (Project). The HRA evaluates the potential significance of impacts to nearby sensitive receptors from Toxic Air Contaminant (TAC) emissions generated during Project construction. The Project does not include new operational sources of TAC; therefore, this assessment focuses exclusively on construction-related diesel particulate matter (DPM).

The Project consists of pedestrian, bicycle, and safety improvements along the Reservation Road corridor within the Tule River Reservation, including the Village Corridor Crossing improvements, construction of a new pedestrian bridge, and replacement of the existing swinging pedestrian bridge. All improvements are conceptual and based on the best available planning-level materials provided by 4Creeks.

The Project is subject to the California Environmental Quality Act (CEQA), with the City of Porterville serving as the Lead Agency. This HRA was prepared to support the Initial Study and permitting.

The San Joaquin Valley Air Pollution Control District (SJVAPCD) is responsible for developing and enforcing air quality regulations within the San Joaquin Valley Air Basin (SJVAB), where the Project is located. Under CEQA, SJVAPCD serves as a Responsible Agency for projects requiring air quality review and provides guidance for evaluating TAC emissions and health risk. SJVAPCD's *Guidance for Assessing and Mitigating Air Quality Impacts* (GAMAQI)[1] outlines the framework for determining whether a project would expose sensitive receptors to substantial pollutant concentrations.

This HRA was prepared in accordance with the Office of Environmental Health Hazard Assessment (OEHHA) *Guidance Manual for Preparation of Health Risk Assessments*[2], SJVAPCD Policy *APR 1906 – Framework for Performing Health Risk Assessments and Guidance for Air Dispersion Modeling*[3], and the SJVAPCD GAMAQI. Construction DPM emissions were modeled using the U.S. EPA American Meteorological Society/EPA Regulatory Model (AERMOD), and

health risks were calculated using the California Air Resources Board (CARB) Hotspots Analysis and Reporting Program (HARP2) Air Dispersion Modeling and Risk Tool (ADMRT).

The maximum residential cancer risk from construction-related diesel particulate matter emissions is below the SJVAPCD significance threshold of 20 in one million. Therefore, construction of the Project would not expose sensitive receptors to substantial pollutant concentrations, and construction TAC impacts would be ***less than*** significant [emphasis as shown in the HRA Report].

An Ambient Air Quality Analysis (AAQA) screening was also performed. The Project is not subject to SJVAPCD Rule 9510 (Indirect Source Review) and is thus exempt from further AAQA. No localized exceedances of National or California Ambient Air Quality Standards are expected and related impacts would be less than significant.

Brief summaries of construction air quality and greenhouse gas (GHG) emissions are included for informational purposes. These sections provide quantified emissions results but do not include the broader regulatory background, setting, or full significance determinations that would be part of a standalone AQ/GHG technical study." (HRA, page 1)

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

Less Than Significant Impact: The SJVAPCD drafted a series of State Implementation Plans (SIP) for the criteria pollutants that are of concern for the San Joaquin Valley Air Basin. The integration of multiple SIPs for each criteria pollutant collectively form the air quality plan for the San Joaquin Valley Air Basin. The most recent SIP is the "2024 Plan for the 2012 PM 2.5 Standard", which focuses on meeting the annual PM 2.5 standard of 12 micrograms/cubic meters originally set in 2012. This SIP includes measures to reduce fine particulate matter emissions and improve air quality by the year 2030. The SJVAPCD has established thresholds in the adopted SIPs and other air quality plans prepared by the Air District. These thresholds are shown in Tables 3-6 for construction and operation. Criteria for determining consistency with the established standards are whether or not the Project's estimated emissions exceed those thresholds established by the Air District. As long as the Project construction and operational emissions do not exceed the thresholds, the Project would not result in new air violations, delay the timely attainment of air quality standards, or result in increased severity of an existing air quality violation.

Ambient Air Quality

As discussed in the HRA Report (page 14), "As described in the AAQA Methodology, the Project is exempt from SJVAPCD Rule 9510 (Indirect Source Review). Because the Project is exempt from ISR, the AAQA process concludes at this step and no further AAQA evaluation is required.

The subsequent AAQA steps—maximum daily onsite screening against the 100-pound-per-day threshold, onsite plus one-quarter-mile mobile-source adjustments, air dispersion modeling, and localized concentration analysis—are not required for this Project.

Because the Project is exempt from SJVAPCD Rule 9510, no further AAQA evaluation is required. The Project would not result in localized exceedances of the NAAQS or CAAQS, and AAQA impacts would be ***less than significant***. [emphasis as shown in the HRA Report]"(HRA, page 14)

As indicated in the HRA Report, criteria pollutant emissions from the Project would not exceed thresholds of significance. " Construction and operational criteria pollutant emissions were estimated using CalEEMod, as described in Section 5 Methodology [of the HRA Report]. Construction emissions reflect standard equipment and schedules for active transportation projects. Operational emissions would consist of minor lighting electricity use and occasional maintenance trips, resulting in negligible operational emission levels. Combined construction and operational emissions are presented in the table below [Table 3-6 of this MND]."

Table 3-6: Criteria Pollutant Emissions Compared to SJVAPCD Thresholds of Significance (tons per year)

CONSTRUCTION	**CO**	**Nox**	**ROG**	**SOx**	**PM10**	**PM2.5**
Construction Emissions (max daily, worst year, worst season)	0.8	0.7	0.8	0.002	0.05	0.03
SJVAPCD Threshold of Significance	100	10	10	27	15	15
Exceeds 100 lb./day?	**NO**	**NO**	**NO**	**NO**	**NO**	**NO**
OPERATION	**CO[1]**	**Nox**	**ROG**	**SOx**	**PM10**	**PM2.5**
Operational Emissions	0.0	0.0	0.002	0.0	0.0	0.0
SJVAPCD Threshold of Significance	100	10	10	27	15	15
Exceeds Threshold?	**NO**	**NO**	**NO**	**NO**	**NO**	**NO**

CO = carbon monoxide
NOx = oxides of nitrogen
ROG = reactive organic gases
SOx = oxides of sulfur; sulfur dioxide (SO2) is the primary constituent and essentially equivalent
PM10 = particulate matter with an aerodynamic diameter less than 10 microns
PM2.5 = particulate matter with an aerodynamic diameter less than 2.5 microns

The nature of the Project can be summarized as pedestrian safety enhancements and new pedestrian bridges which would not result in substantial emission-generating uses at or near the proposed Project location. Construction-related emissions will be short-term, temporary, and intermittent and will cease after construction-related activities are concluded. Further, the overall objective of this type of project is to enhance, encourage, and facilitate pedestrian and bicycling mobility while also providing components to ensure pedestrian/cycling safety. As shown in Table 3-6, none of the criteria pollutant emissions from the Project would exceed the 100-pound-per-day applicability threshold for construction or operation. Therefore, no further AAQA is required and the Project would not

expose sensitive receptors to substantial pollutant concentrations by resulting in a localized exceedance of NAAQS or CAAQS. With respect to the numerical threshold established by SJVAPCD, the associated impact would be *less than significant.* No mitigation is required outside of compliance with existing regulations and/or with implementation of all applicable State and/or regional measures.

To reiterate, as shown in Table 3-6, Project construction and operational emissions would not exceed the SJVAPCD thresholds of significance. As the Project is not anticipated to exceed any SJVAPCD thresholds of significance, the Project will not conflict with or delay the implementation of the SJVAPCD attainment/implementation plans for criteria pollutants. Therefore, based on the analysis and information provided herein, and in the HRA report (see Appendix A) prepared by qualified consultants Core Environmental Consulting, the impacts would be *less than significant.*

Mitigation Measures: None Required.

b) Would the Project result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable Federal or state ambient air quality standard?

Less Than Significant Impact: The SJVAPCD is responsible for bringing air quality in the entire San Joaquin Valley Air Basin planning area, including the Tule River Reservation, into compliance with federal and state air quality standards. The significance thresholds and rules developed by the SJVAPCD are designed to prevent Projects from violating air quality standards or significantly contributing to existing air quality violations. As discussed in Item a), neither construction-related emissions nor operation-related emissions will exceed thresholds established by the SJVAPCD.

The Project will comply with all applicable SJVAPCD rules and regulations, which will further reduce the potential for any significant impacts related to air quality as a result of Project implementation. Because these thresholds and regulations are designed to achieve and/or maintain federal and state air quality standards, and the Project is compliant with these thresholds and regulations, the Project will not violate an air quality standard or significantly contribute to an existing air quality violation. As noted earlier, the nature of the Project is pedestrian safety enhancements and new pedestrian bridges which would not result in substantial emission-generating uses at or near the proposed Project location. Construction-related emissions will be short-term, temporary, and intermittent and will cease after construction-related activities are concluded. Further, the overall objective of this type of project is to enhance, encourage, and facilitate pedestrian and bicycling mobility while also providing components to ensure pedestrian/cycling safety. Therefore, based on the analysis and information provided herein, and in the HRA report (see Appendix A) prepared by qualified consultants Core Environmental Consulting, the impact would be *less than significant.*

Mitigation Measures: None Required.

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

Less than Significant Impact: This discussion is partially based on the Health Risk Assessment (HRA) prepared by qualified consultants Core Consulting, LLC., which can be found in Appendix A.

Health Risk Assessment

Due to the nature of the Project, there is the potential to Impact Sensitive Receptors, as such the HRA component of the AQ Memorandum modeled downwind receptors. As noted in the HRA Report, "The highest modeled cancer risk occurs at Receptor 15, a residence located adjacent to the northern side of the central portion of Project 1." (HRA, page 14)

Results of the AERMOD modeling and ADMRT calculations are included in Appendix A of the HRA, (Table 3-7 in this MND], along with a map of receptors. Modeling input and output files will be made available to reviewing agencies upon request from the City of Porterville. The highest risks calculated for each scenario are presented in the Table 3-7, along with comparisons to SJVAPCD thresholds of significance. All results are the maximally exposed individual (MEI) for each scenario.

Table 3-7: Construction HRA Results Compared to SJVAPCD Thresholds of Significance

Risk[1]	Carcinogen (risk in one million)	Chronic Hazard Index	Acute Hazard Index
Construction Health Risk	14.6	0.016	N/A[1]
Thresholds of Significance	20	1	1
Exceeds Threshold?	NO	NO	NO
Exceeds Threshold?	**NO**	**NO**	**NO**

[1]No Acute HI was calculated for Construction DPM Acute risk because OEHHA has not established REL.

As shown in Table 3-7 (Table 2 of the HRA Report)," The highest modeled cancer risk occurs at Receptor 15, a residence located adjacent to the northern side of the central portion of Project 1." (HRA, page 20). "Construction health risks would be below SJVAPCD thresholds of significance. Therefore, the Project would not expose sensitive receptors to substantial pollutant concentrations, and TAC impacts would be *less than significant* [emphasis as shown in the HRA Report]. (HRA, page 14)

Therefore, based on the information and analysis provided herein, and in the HRA report (see Appendix A) prepared by qualified consultants Core Environmental Consulting, the impact would be *less than significant.*

Mitigation Measures: None required.

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

Less Than Significant Impact: Some typical construction-related odors would be generated during Project construction. As discussed in Item (c), the Project is adjacent to one (1) sensitive receptor located adjacent to the northern of the central portion of the Project. As such, this receptor may be temporarily affected by such odors. Odors will likely be generated from diesel emissions from construction-related equipment rather than operational-related activities and traffic associated with the Project. Additionally, the proposed Project would not include any odor sources identified in Table 6 of the SJVAPCD's Guidance for Assessing and Mitigating Air Quality Impacts (GAMAQI) and no health risks associated with such odors were identified in the HRA done by Core Environmental.

Although the Project may create objectionable odors (e.g., diesel engine emissions and asphalt fumes during paving operations), the odors would be short-term, temporary, and intermittent during construction-related activities and would not affect a substantial number of people. Operational odors would be unlikely as the nature of the Project is pedestrian safety enhancements and new pedestrian bridges which would not result in emission-generating uses proposed at the Project location. As such, based on the information and analysis provided herein, and in the HRA report (see Appendix A) prepared by qualified consultants Core Environmental Consulting, the impact would be *less than significant.*

Mitigation Measures: None Required.

Mitigation Measures: None Required.

Based on the analysis and information provided herein, and in the HRA report (see Appendix A) prepared by qualified consultants Core Environmental Consulting, no mitigation measures would not be required.

Cumulative Impact: Less Than Significant with Mitigation

The geographic area of this cumulative analysis is the San Joaquin Valley Air Basin. The Project's emissions would be less than significant for all criteria pollutants and would be consistent with the Air Quality Plan for this criterion. The Project would be required to comply with all applicable rules and regulations as specified in the applicable air quality plan(s). The

project's less-than-significant contribution to air quality and its adherence to applicable rules and regulations would allow the Project to remain consistent with the AQP; therefore, the cumulative impact would be less than significant. As shown in Tables 3-5, 3-6, and 3-7, the Project's regional emissions would not exceed the applicable regional criteria pollutant emissions quantitative thresholds. In addition, any permitted sources will be required to comply with Air District rules, regulations, permit conditions, thresholds, (requirements), as applicable. The project would not generate a significant source of odors. Therefore, based on the information and analysis provided herein, and in the HRA report (see Appendix A) prepared by qualified consultants Core Environmental Consulting, the Project would result in a *less than significant impact*.

IV. BIOLOGICAL RESOURCES

Would the Project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less than Significant Impact	No Impact
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish & Game 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 Game or US 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 director 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?	☐	☐	☐	☑

A Biological Evaluation (BE) prepared by qualified consultants Live Oak Associates, Inc. (LOA) was used to determine impacts to Biological Resources and is included as Appendix B. Where necessary, and if available, additional site-specific facts, data, information, etc., are included in this discussion.

Environmental Setting

The following has been excerpted from the Biological Evaluation (BE) to remain consistent with the information provided in the BE. "The study area is located within the low foothills of the southern Sierra Nevada, in a transition zone from the Central Valley to the Sierra Nevada. The topography of the area consists of gentle to steeply sloped terrain.

Like most of California, this region of the Sierra Nevada foothills has a Mediterranean climate. Warm, dry summers are followed by cool, moist winters with spring and fall as transitional seasons. Summer temperatures commonly exceed 90 degrees Fahrenheit, and the relative humidity is generally very low. Winter temperatures rarely rise much above 70 degrees Fahrenheit, and daytime high temperatures are often below 60 degrees Fahrenheit. Annual precipitation at the nearest NOAA weather station, Springville, is about 16.5 inches, nearly all of which falls during fall and winter months (NOAA 2021).

The principal drainage of the project vicinity is the South Fork Tule River, which bisects the study area latitudinally. The South Fork Tule River originates near the summit of Slate Peak, approximately 12 miles northeast of the study area. It flows through the study area from east to west, ultimately exiting the Reservation and joining the main stem of the Tule River at Lake Success. Downstream of Lake Success, the Tule River historically flowed into Tulare Lake; however, agricultural diversions have eliminated the lake and greatly degraded the Tule River itself." (BE, page 5)

Study Area

"The study area is characterized by a mix of developed and undeveloped lands. Developed lands include the Village Center area and rural residences along both sides of the South Fork Tule River. Undeveloped lands consist of an approximately 0.6-mile-long reach of the river and an associated woodland corridor.

The study area has an overall western aspect, reflecting the gradient of the river corridor. Elevations range from approximately 1,100 feet above sea level in the northeastern corner of the study area to approximately 1,000 feet at the western boundary.

The study area contains three soil mapping units: Blasingame-Rock outcrop complex, 9 to 50 percent slopes; Blasingame sandy loam, 15 to 30 percent slopes; and Xerofluvents, flooded

(California Soil Resource Lab 2008). The latter mapping unit generally conforms to the on-site reach of the South Fork Tule River corridor, and is associated with drainageways and alluvial fans elsewhere in the region. It is considered hydric, meaning it has the propensity to pond water and support hydrophytic (water-loving) vegetation. The Blasingame mapping units are both non-hydric (NRCS 2026).

A list of vascular plants identified on the site is presented in Appendix A [of the BE]. A list of terrestrial vertebrates using or potentially using the study area is presented in Appendix B [of the BE]. Representative photos of the site are presented in Appendix C.[of the BE]" (BE, pages 5-6)

Regulatory Setting

The following has been excerpted from the Biological Evaluation (BE) to remain consistent with the information provided in the BE.

Federal

"National Environmental Policy Act

Projects that are proposed, funded, or authorized by federal agencies are generally subject to the provisions of NEPA. Signed into law in 1970 and amended most recently by the Fiscal Responsibility Act of 2023, NEPA requires federal agencies to evaluate the environmental effects of their proposed actions prior to making decisions. Agencies must utilize systematic, interdisciplinary approach that includes the review of technically and economically feasible alternatives to the proposed action, and must ensure professional and scientific integrity in the environmental documents they prepare.

The level of NEPA review that is required is related to a project's potential to cause "significant" environmental effects. Projects with reasonably foreseeable significant effects on the quality of the human environment require an Environmental Impact Statement (EIS). Among other elements, an EIS requires detailed analyses of the project's environmental effects, development and study of a reasonable range of alternatives to the proposed action, and consideration of public comments received during the scoping process. Projects that do not have reasonably foreseeable significant effects on the quality of the human environment, and projects for which the significance of such effects is unknown, may meet their NEPA obligations with the preparation of an Environmental Assessment (EA). An EA is a concise public document that either provides the basis for a federal agency's finding of no significant impact or culminates in a determination that an EIS is necessary." (BE, pages 22-23)

"State and Federal Endangered Species Acts

In California, imperiled plants and animals may be afforded special legal protections under the California Endangered Species Act (CESA) and/or Federal Endangered Species Act (FESA). Species may be listed as "threatened" or "endangered" under one or both Acts, and/or as "rare" under CESA. Under both Acts, "endangered" means a species is in danger of extinction throughout all or a significant portion of its range, and "threatened" means a species is likely to become endangered within the foreseeable future. Under CESA, "rare" means a species may become endangered if their present environment worsens. Both Acts prohibit "take" of listed species, defined under CESA as "to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture or kill" (California Fish and Game Code, Section 86), and more broadly defined under FESA to include "harm" (16 USC, Section 1532(19), 50 CFR, Section 17.3)." (BE, page 23)

"Migratory Bird Treaty Act

The Migratory Bird Treaty Act (MBTA: 16 USC 703-712) prohibits killing, possessing, or trading in any bird species covered in one of four international conventions to which the United States is a party, except in accordance with regulations prescribed by the Secretary of the Interior. The name of the act is misleading, as it actually covers almost all birds native to the United States, even those that are non-migratory. The MBTA encompasses whole birds, parts of birds, and bird nests and eggs. (Ibid.)

"Habitat Conservation Plans and Natural Community Conservation Plans

Section 10 of the federal Endangered Species Act establishes a process by which non-federal projects can obtain authorization to incidentally take listed species, provided take is minimized and thoroughly mitigated. A Habitat Conservation Plan (HCP), developed by the project applicant in collaboration with the USFWS and/or NMFS, ensures that such minimization and mitigation will occur, and is a prerequisite to the issuance of a federal incidental take permit. Similarly, a Natural Community Conservation Plan (NCCP), developed by the project applicant in collaboration with CDFW, provides for the conservation of biodiversity within a project area, and permits limited incidental take of state-listed species." (BE, pages 23-24)

"Clean Water Act

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)). The CWA does not supply a definition for waters of the U.S., and that has been the subject of considerable debate since the CWA's passage in 1972. A variety of regulatory definitions have been promulgated by the two federal agencies responsible for implementing the CWA, the Environmental Protection Agency (EPA) and USACE. These definitions have been interpreted, and in some cases, invalidated, by federal courts.

Waters of the U.S. are presently defined by the EPA and USACE's joint 2023 Revised Definition of 'Waters of the U.S.' Rule (2023 WOTUS Rule), issued in January 2023 and amended in August 2023. Generally speaking, waters of the U.S. include:

- Waters which are currently used, or were used in the past, or may be susceptible to use in interstate or foreign commerce, including all waters which are subject to the ebb and flow of the tide
- The territorial seas
- Interstate waters
- Impoundments of waters otherwise defined as waters of the United States
- Tributaries to other waters of the U.S. that are relatively permanent, standing or continuously flowing bodies of water
- Wetlands adjacent to other waters of the U.S. that have a continuous surface connection to those waters

The 2023 WOTUS Rule also defines a number of exclusions from the definition of waters of the U.S., many of which are longstanding exclusions from earlier regulatory regimes. These generally include:

- Waste treatment systems
- Prior converted cropland
- Ditches excavated wholly in and draining only dry land that do not carry a relatively permanent flow of water
- Certain artificial features, e.g. irrigation basins, swimming pools, borrow pits, and artificially irrigated areas
- Swales and erosional features characterized by low volume, infrequent, or short duration flow

Projects that will discharge dredge or fill material into waters of the U.S. must obtain Section 404 permit coverage from the USACE. Small-scale projects are often able to obtain coverage under one or more Nationwide Permits, while large-scale projects generally need to obtain Individual Permits. Section 404 permits typically require mitigation to ensure that there will be no net loss of wetland functions or values.

Projects that discharge pollutants into waters of the U.S., either from a localized "point source" or more general "nonpoint source," must obtain a NPDES permit. On tribal lands, unless the Tribe has obtained "treated in a similar manner as a state" (TAS) status, the NPDES program and any associated permitting is administered by the EPA. NPDES permits cover a wide range of scenarios, from large-scale industrial or wastewater discharges to small-scale stormwater discharges from construction sites. Stormwater permit coverage is required for any project that will disturb one acre or more of land through earth-disturbing activities such as clearing, grading, excavating, and stockpiling. Most such projects can obtain blanket coverage under the EPA's Construction General Permit (CGP).

Any federal permit or license for discharges into waters of the U.S. must be accompanied by a Section 401 Water Quality Certification (WQC) certifying that the project will comply with applicable water quality standards. For Tribes without TAS status, the EPA once again functions as the permitting authority. Where Tribes have adopted their own EPA-approved water quality standards, the EPA applies those tribal standards to the WQC. Where Tribes do not have their own water quality standards, and where the affected waterbody flows into the adjacent state, the EPA typically applies that state's water quality standards to the WQC." (BE, pages 24-26)

State

Birds of Prey (CA Fish and Game Code Section 3503.5)

Sections 3800, 3513, and 3503 of the California Fish and Game Code specifically protect birds of prey. Section 3800 states that it is unlawful to take nongame birds, such as those occurring naturally in California, that are not resident game birds, migratory game birds, or fully protected birds, except when in accordance with regulations of the commission or a mitigation plan approved by CDFW for mining operations. Subsection 3503.5 prohibits taking, possessing, or destroying any birds and their nests in the orders Strigiformes (owls) or Falconiformes (hawks and eagles). These provisions, along with the Federal MBTA, serve to protect nesting raptors.

Clean Water Act

Section 404 of the Clean Water Act of (1972) is to maintain, restore, and enhance the physical, chemical, and biological integrity of the nation's waters. Under Section 404 of the Clean Water Act, the US Army Corps of Engineers (USACE) regulates discharges of dredged and filled materials into "waters of the United States" (jurisdictional waters).

California Endangered Species Act (CESA)

The California ESA (California Fish and Game Code §§ 2050- 2116) generally parallels the main provisions of ESA, but unlike its Federal counterpart, the California ESA applies the take prohibitions to species proposed for listing (called "candidates" by the state). Section 2080 of the California Fish and Game Code prohibits the taking, possession, purchase, sale, and import or export of endangered, threatened, or candidate species, unless otherwise authorized by permit or in the regulations. Take is defined in Section 86 of the Fish and Game Code as "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill." the California ESA allows for take incidental to otherwise lawful development Projects. State lead agencies are required to consult with CDFW to ensure that any action they undertake is not likely to jeopardize the continued existence of any endangered, threatened, or candidate species or result in the destruction or adverse modification of essential habitat.

California Environmental Quality Act (CEQA)

As noted in the BE, "In California, any project carried out or approved by a public agency that will result in a direct or reasonably foreseeable indirect physical change in the environment must comply with CEQA. The purpose of CEQA is to ensure that a project's potential impacts on the environment are evaluated and methods for avoiding or reducing these impacts are considered before the project is allowed to move forward. A secondary aim of CEQA is to provide justification to the public for the approval of any projects involving significant impacts on the environment.

According to Section 15382 of the CEQA Guidelines, a significant effect on the environment means a "substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic interest." Although the lead agency may set its own CEQA significance thresholds, project impacts to biological resources are generally considered to be significant if they would meet any of the following criteria established in Appendix G of the CEQA Guidelines:

- 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 CDFW or USFWS.
- Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by CDFW or USFWS.
- 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.
- Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.
- Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.
- Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

Furthermore, CEQA Guidelines Section 15065(a) requires the lead agency to make "mandatory findings of significance" if there is substantial evidence that a project may:

- 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, or substantially reduce the number or restrict the range of an endangered, rare or threatened species.
- Achieve short-term environmental goals to the detriment of long-term environmental goals.

- Produce environmental effects that are individually limited but cumulatively considerable, meaning that the incremental effects of the project are significant when viewed in connection with the effects of past projects, other current projects, and probable future projects." (BE, pages 21-22)

Local

Tribal

As noted in the BE, "It is assumed that the project will be implemented in a manner consistent with any Tribal policies or ordinances that pertain to biological resources." (BE, page 38)

Discussion

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

The BE provided a comprehensive discussion of potentially significant Project impacts. The discussion can be found in its entirety in Appendix B of this document.

Special Status Plants

"Of the 24 regionally occurring special status plant species, three have some potential to occur in the study area. These are the rose-flowered larkspur (*Delphinium purpusii*), calico monkeyflower (*Diplacus pictus*) and Munz's iris (*Iris munzii*). Their potential occurrence on site is limited to the woodlands of the site's river corridor (see Figure 3 [of the BE]). Two project components are proposed for this area: replacement of an existing pedestrian bridge and construction of a new pedestrian bridge. If individuals or populations of these species are found in the work areas for bridge construction, they may be damaged or destroyed by construction activities. This is considered a potentially significant impact of the project.

The remaining 21 regionally-occurring special status plant species have no appreciable potential to occur on site due to the absence of suitable habitat or soils, the site's being located outside of the species' distributions, or a combination thereof. Project impacts are less than significant for the 21 regionally-occurring plant species that are not expected to occur on site." (BE, page 27)

See recommended Mitigation Measures BIO-4.1a, 4.1b, and 4.1c.

Monarch Butterfly

"The monarch butterfly has the potential to forage, roost, and possibly breed along the study area's river corridor and in undeveloped portions of its rural residential properties. Two project components are proposed for such areas: replacement of an existing pedestrian bridge and construction of a new pedestrian bridge. All other project activities will take place in the Village Center, where monarchs have little potential to occur and no project-related impacts to this species are anticipated.

The potential for direct effects to monarchs is greatest during the spring and summer, when monarchs may breed in the project vicinity. Monarch eggs, larvae, and pupae would be particularly vulnerable to construction-related mortality, as these life stages are relatively immobile and unable to leave their milkweed host plants. Monarch adults are volant and would presumably have some ability to avoid construction disturbance while foraging or roosting on site.

The project may also indirectly affect monarchs through any construction-related loss of milkweed habitat that occurs. Loss of milkweed habitat has been cited as a major factor in monarch population declines (USFWS 2020). While project-related removal of milkweed plants would be minor, if it occurs at all, it would incrementally contribute to a habitat trend that is substantially affecting this species, and potential impacts associated with milkweed loss are therefore considered significant.

The project is not expected to adversely affect monarchs through loss of other plants that could be used for foraging by this species, or by loss of trees. Project-related vegetation removal will be localized and small-scale, and considerable alternative foraging and roosting habitat will remain available to monarchs following project implementation, both on- and off-site." (BE., pages 28-29)

See recommended Mitigation Measures BIO-4.2a, 4.2b, and 4.2c.

Crotch's Bumble Bee

"The Crotch's bumble bee has the potential to forage, nest, and overwinter along the study area's river corridor and in undeveloped portions of its rural residential properties. Two project components are proposed for such areas: replacement of an existing pedestrian bridge and construction of a new pedestrian bridge. All other project activities will take place in the Village Center, where habitat is absent and no impacts to the Crotch's bumble bee are anticipated.

If Crotch's bumble bees are present at the time of bridge construction, individual bees may be vulnerable to construction-related injury or mortality. This is of particular concern during nesting, as destruction of a single nest may result in the mortality of numerous adults and

larvae. Construction-related destruction of Crotch's bumble bee nests would be considered a significant impact of the project.

The Crotch's bumble bee is not expected to be adversely affected by project-related loss of habitat. Habitat impacts associated with bridge construction will be localized and small-scale. Extensive habitat for this species will remain available elsewhere along the South Fork Tule River and on adjoining lands. Loss of habitat for the Crotch's bumble bee is not considered to be a significant impact of the project." (BE 2, page 9-30)

See recommended Mitigation Measures BIO-4.3a, 4.3b, and 4.3c.

Western Pond Turtle

"Two project components are proposed in areas where western pond turtles may occur: replacement of an existing pedestrian bridge and construction of a new pedestrian bridge at locations along the South Fork Tule River. Turtles may be found in the river at these locations and may bask or overwinter in adjoining terrestrial habitats. Both locations are characterized by woodland habitat with high levels of canopy closure unconducive to nesting by this species.

If turtles are present at the time of bridge construction, individuals could be injured or killed by construction activities. This is considered to be a potentially significant impact of the project. All other project activities will take place in the Village Center, where habitat is absent and no impacts to the western pond turtle are anticipated.

The western pond turtle is not expected to be adversely affected by project-related loss of habitat. Habitat impacts associated with bridge construction will be localized and small-scale. Extensive habitat for this species will remain available elsewhere along the South Fork Tule River following project implementation. Loss of habitat for the western pond turtle is not considered to be a significant impact of the project." (BE, page 31)

See recommended mitigation measures BIO-4.4a, 4.4b, 4.4c, and 4.4d.

Northern California Legless Lizard

"The northern California legless lizard has the potential to occur in the terrestrial habitats of the study area's river corridor. Two project components are proposed for such areas: replacement of an existing pedestrian bridge and construction of a new pedestrian bridge. If legless lizards are present at the time of these construction activities, individuals could be injured or killed. This is considered to be a potentially significant impact of the project. All other project activities will take place in the Village Center, where habitat is absent and no impacts to legless lizards are anticipated

The northern California legless lizard is not expected to be adversely affected by project-related loss of habitat. Habitat impacts associated with bridge construction will be localized and small-scale. Extensive habitat for this species will remain available elsewhere along the South Fork Tule River following project implementation. Loss of habitat for the northern California legless lizard is not considered to be a significant impact of the project." (BE 33-34)

See recommended Mitigation Measures BIO-4.1.5a and 4.1.5b.

Nesting Bird and Raptors

"The study area may be used for nesting by numerous birds and raptors protected by the Migratory Bird Treaty Act. If project construction takes place during the nesting season, birds nesting in active work areas could be injured or killed by construction activities or disturbed to a degree that their reproductive success could be compromised. Construction-related nest disturbance is also a possibility for nests located outside of work areas, but within visual or auditory range of construction activities. Construction-related mortality/disturbance of nesting birds and raptors is a potentially significant impact of the project." (BE, page 33)

See recommended Mitigation Measures BIO-4.6a, 4.6b, and 4.6c.

Tree-roosting Bats including Pallid Bat

The study area's buildings and mature trees have the potential to support roosting by various bat species. The project will not remove or otherwise impact buildings, and no project-related impacts to any bats roosting in the site's buildings are expected. Some amount of tree removal will likely be needed to accommodate the proposed pedestrian bridge replacement and construction activities in the river corridor, introducing the potential for construction-related injury or mortality to tree-roosting bats, possibly including the pallid bat (*Antrozous pallidus*), a California Species of Special Concern. Construction-related injury or mortality of the pallid bat and other tree-roosting bats is a potentially significant impact of the project.

The pallid bat is not expected to be adversely affected by project-related loss of habitat. Although a few potential roost trees may be removed, numerous similar trees will remain available elsewhere along the river corridor, both on-site and off-site. The study area's foraging value for this species will remain virtually unchanged. Any pallid bats that presently forage on site would be expected to continue to do so following project development. Loss of habitat for the pallid bat is not considered to be a significant impact of the project.: (BE, page 34)

See recommended Mitigation Measures BIO-4.7a, 4.7b, 4.7c, and 4.7d.

Therefore, based on the analysis and information provided herein, and implementation of the Mitigation Measures recommended in the BE prepared by qualified consultants LOA, the Project would result in a *less than significant impact*.

Mitigation Measures: See Mitigation Measures discussion.

b) Would the Project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?

Less than Significant Impact with Mitigation: "As discussed [in the BE], the study area contains a vegetation alliance classified by the VegCAMP system as a sensitive natural community, California sycamore-coast live oak (CDFW 2026b). Broadly, this community corresponds to the river corridor habitat type identified in this report (see Figure 3). Two project components are proposed for the river corridor: replacement of an existing pedestrian bridge and construction of a new pedestrian bridge. These project components may temporarily disturb an area of up to 2 acres, with permanent impacts limited to the bridges themselves. Some amount of riparian tree and shrub removal will be needed to accommodate bridge construction. Loss of riparian trees and shrubs, even if minor, will contribute to degradation of a sensitive natural community and is considered a potentially significant impact of the project." (BE, page 35). Therefore, based on the analysis and information provided herein, and implementation of the Mitigation Measures recommended in the BE prepared by qualified consultants LOA, the Project would result in a *less than significant impact with mitigation measures*.

Mitigation Measures: See recommended Mitigation Measures 4.8a and 4.8b

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

Less Than Significant Impact: . LOA provided the following analysis in the BE with a caveat. "As discussed [in the BE], the project includes improvements related to two pedestrian bridges over the South Fork Tule River. One of the bridges is currently existing but experienced damage during past flooding and will be replaced under the project. The other bridge is newly proposed and will interconnect Cow Mountain Road with the pedestrian corridor to the Justice Center. It is unknown, at present, whether either bridge will require the placement of structures or materials below the river's ordinary high water mark, which represents the typical extent of USACE jurisdiction. Any impacts that do occur within the jurisdictional area of the river would be extremely small-scale and are not expected to affect the function and value of this aquatic resource. Project impacts to waters of the U.S. are not considered to be significant. However, depending on bridge design, permits from the USACE and EPA may be required." (BE, page 37). Therefore, based on the analysis and information provided herein,

and in the BE prepared by qualified consultants LOA, the Project would result in a *less than significant impact.*

Mitigation Measures: None required.

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

Less Than Significant Impact: As indicated in the BE, "The reach of the South Fork Tule River passing through the study area is likely to function as a regionally important wildlife movement corridor. As discussed, two project components are proposed within the river corridor: replacement of an existing pedestrian bridge and construction of a new pedestrian bridge. While bridge construction is occurring, there will be an elevated level of disturbance at these two locations, which may cause terrestrial wildlife to shift their movements away from the work areas. Following construction, disturbance levels at these locations will drop, but will remain somewhat above baseline due to the introduction of intermittent pedestrian traffic across the river corridor. The river corridor is 250 to 350 feet wide at the proposed bridge sites and contains substantial hiding cover, with opportunities for movement on either side of the channel. Although terrestrial wildlife moving along the river corridor may experience new anthropogenic disturbance as a result of bridge development, the project is not expected to significantly interfere with wildlife use of this corridor. Project impacts to wildlife movement corridors are not consider to be significant." (BE, page 38). Therefore, based on the analysis and information provided herein, and the BE prepared by qualified consultants LOA, the Project would result in a *less than significant impact*.

Mitigation Measures: None required.

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

No Impact: As indicated in the BE, "It is assumed that the project will be implemented in a manner consistent with any Tribal policies or ordinances that pertain to biological resources. (BE, page 38)

As such, based on the analysis and information provided herein, and the BE prepared by qualified consultants LOA, there would be *no impact.*

Mitigation Measures: None required.

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

Less than Significant Impact: The Project Site is not located within the boundaries of any adopted Habitat Conservation Plan, Natural Communities Conservation Plan, or other approved local, regional, or state habitat conservation plan. As noted in the BRE, "It is assumed that the project will be implemented in a manner consistent with any Tribal policies or ordinances that pertain to biological resources." (BE, page 38)

Therefore, based on the analysis and information provided herein, and on the BE prepared by qualified consultants LOA, there would be a *less than significant impact*.

Mitigation Measures: None required. As noted in the BE, "It is assumed that the project will be implemented in a manner consistent with any Tribal policies or ordinances that pertain to biological resources." (BE, page 38). As such, there would be a *less than significant impact.*

Mitigation Measures:

The following recommended mitigation measures are excerpted from the BE prepared by qualified consultants Live Oak Associates. The numbering format from the BE has been revised to reflect the format used in this MND. The recommended mitigation measures, in their original format contained in the BE, can be found in their entirety in Appendix B.

Special Status Plants

BIO-4.1a (Protocol-level Surveys). Prior to the start of bridge construction, or any other project activity in the river corridor, protocol-level rare plant surveys will be conducted within the associated work areas. The surveys will be conducted when local populations of the target species are in bloom, as determined through visits to reference populations and/or consultation with local botanists. The general blooming windows are April-May for the rose-flowered larkspur, March-May for the calico monkeyflower, and March-April for the Munz's iris.

BIO-4.1b (Avoidance). Any individuals or populations of the rose-flowered larkspur, calico monkeyflower, or Munz's iris found during the surveys will be avoided by project activities to the maximum extent feasible. A qualified biologist will identify an appropriate construction-free zone around populations to be avoided. Construction-free zones will be delineated on the ground with temporary construction fencing and maintained for the duration of project activities.

BIO-4.1c (Salvage and Relocation). If it is not feasible to avoid some or all of any rose-flowered larkspur, calico monkeyflower, or Munz's iris individuals or populations found on site, those plants that cannot be avoided will be salvaged and relocated to alternative habitat by a qualified botanist following the provisions of a salvage, relocation, and monitoring plan.

Alternative habitat must be in an area protected from herbicide application, excessive grazing, and other deleterious impacts.

Monarch Butterfly

BIO-4.2a (Milkweed Survey). Prior to the start of bridge construction, a qualified biologist will survey the associated work areas for milkweed plants. The survey will be conducted at a time of year when milkweed is readily identifiable. The objective of the survey will be to tally and map all milkweed plants that could potentially be impacted by project activities.

BIO-4.2b (Construction Timing). If feasible, no milkweed plants will be removed during the period when monarchs are most likely to breed in the project vicinity, March to August.

BIO-4.2c (Compensatory Mitigation). Any milkweed plants that are removed by the project will be replaced at a 3:1 ratio in accordance with a revegetation plan prepared by a qualified biologist. The planting site(s) must be in similar or higher quality habitat to the habitat that was impacted, in area(s) that will not be mowed or treated with pesticides or herbicides.

Crotch's bumble bee

BIO-4.3a (Construction Timing). If feasible, all bridge construction activities will take place between October and February, outside of the period in which Crotch's bumble bee nests are typically active.

BIO-4.3b (Preconstruction Surveys). If bridge construction must occur between March and September, then a qualified biologist will conduct preconstruction surveys for the Crotch's bumble bee within the associated work areas. To maximize detection, the surveys will be conducted on warm, sunny days (65-90 degrees F) when there is low wind (less than 8 mph).

The surveys will be conducted by walking meandering transects through the work areas, while visually searching for bumble bees and potential nest sites. Any bumble bees that are observed will be followed and, if possible, photographed once they alight on a plant, highlighting the following features to aid identification:

- Face, including cheek length
- Top of the head
- Banding on the abdomen
- Color pattern on the thorax

At any burrows or other underground features that exhibit concentrated bumble bee activity, the surveyor will monitor activity to determine nesting status.

BIO-4.3c (Avoidance). Any suspected Crotch's bumble bee nests that are discovered during the surveys will be avoided by an appropriate setback during bridge construction activities, until the biologist determines the nest is no longer active.

Western Pond Turtle

BIO-4.4a (Preconstruction Surveys). Within 24 hours prior to the start of bridge construction at each location, a qualified biologist will conduct a preconstruction survey for western pond turtles in the associated work area.

BIO-4.4b (Relocation). The biologist will capture and relocate any turtles found within the work areas during the surveys. Turtles will be relocated to suitable alternative habitat within the river corridor, well outside of work area boundaries.

BIO-4.4c (Employee Education Program). Prior to the start of bridge construction, workers will receive training on western pond turtle identification and life history and the project-specific measures required for this species' protection.

BIO-4.4d (Site Inspections and Turtle Avoidance/Relocation). During bridge construction, construction staff will regularly inspect the work area for western pond turtles. At a minimum, this will include (1) checking for turtles under and around any parked vehicles or equipment prior to their operation, (2) scanning the ground for turtles while operating vehicles or equipment, and (3) checking any open trenches or other excavations for trapped turtles at the beginning and end of each work day.

BIO-4.4e (Avoidance). If any turtles are observed on site while work is occurring, work in the immediate area will cease and turtles will be allowed to leave the construction zone of their own volition, if feasible. If necessary, a qualified biologist will capture and relocate such turtles as described above under Mitigation Measure 4.1.4b.

Northern California Legless Lizard

BIO-4.5a (Preconstruction Surveys). Within 24 hours prior to the start of bridge construction at each location, a qualified biologist will conduct a preconstruction survey for northern California legless lizard in the associated work area. The survey will entail visually searching all terrestrial habitats of the work areas and will include gently raking leaf litter and turning over rocks, logs, and other features that could serve as refugia for individuals of this species.

BIO-4.5b (Relocation). The biologist will capture and relocate any legless lizards found within the work areas during the surveys. Lizards will be relocated to suitable alternative habitat within the river corridor, outside of work area boundaries.

Nesting Birds and Raptors

BIO-4.6a (Construction Timing). If feasible, the project will be constructed between September 1 and January 31, outside of the avian nesting season.

BIO-4.6b (Preconstruction Surveys). If construction is to occur between February 1 and August 31, a qualified biologist will conduct pre-construction surveys for active bird nests within 10 days prior to the start of any work within this period. The survey area will encompass the work area(s) and surrounding lands within 500 feet for nesting raptors and 250 feet for other nesting birds.

BIO-4.6c (Avoidance of Active Nests). Should any active nests be discovered in or near proposed construction zones, the biologist will identify a suitable construction-free buffer around the nest. The buffer distance will be determined based on species biology, site-specific conditions, and the level of project-related disturbance that is anticipated near the nest(s) in question. Buffers will be identified on the ground with flagging or fencing and will be maintained until the biologist has determined that the young have fledged and are capable of foraging independently.

Tree roosting bats including Pallid Bat

BIO-4.7a (Construction Timing). If feasible, project-related tree removal will occur outside of the period between April 15 and September 30. This is the time frame within which colony-roosting bats in the vicinity generally assemble, give birth, nurse their young, and ultimately disperse.

BIO-4.7b (Pre-construction Surveys). Within 10 days prior to the removal of any mature trees, a qualified biologist will survey these features for roosting bats. The biologist will look for individuals, guano, and staining, and will listen for bat vocalizations. If necessary, the biologist will wait for nighttime emergence of bats from roost sites.

BIO-4.7c (Avoidance of Maternity Roosts). Should any active maternity bat roosts be discovered, the biologist will identify a suitable construction-free buffer around the roost(s). The buffer will be identified on the ground with flagging or fencing, and will be maintained until the biologist has determined that the nursery is no longer active.

BIO-4.7d (Humane Eviction of Non-breeding Bats). If a non-breeding bat colony is found, the individuals will be humanely evicted, under the direction of a qualified biologist, to ensure that bats are not physically harmed by tree removal.

Sensitive Natural Communities

BIO-4.8a (Tree Survey). Prior to project construction, a qualified biologist will survey all portions of the river corridor that are proposed for direct impact. All trees and shrubs within

these areas will be identified to species and mapped, and their diameter at breast height (DBH) will be recorded. At the end of construction, a qualified biologist will repeat the survey to quantify the tree and shrub removal that occurred.

BIO-4.8b (Replacement Plantings). Replacement plantings will be provided as compensation for removal of any riparian trees or shrubs with a DBH of 4 inches or greater. Plantings will be installed at a ratio of 3:1 for impacted trees/shrubs with a DBH between 4 and 24 inches, and at a ratio of 10:1 for impacted trees with a DBH greater than 24 inches. All plantings will be monitored annually for a minimum of five years. A revegetation plan will be prepared for the project that will detail the methods for planting, irrigating, and maintaining the replacement trees and shrubs.

Therefore, based on the analysis and information provided herein, and the Mitigation Measures recommended in the BE prepared by qualified consultants LOA, there would be *a less than significant impact*.

Cumulative Impact: Less Than Significant

Biological resources can be both region-wide or limited to a particular location with suitable habitat to support a biological resource (i.e., plant (e.g., flower or tree), amphibian, bird, reptile, mammal, etc.). Within the Study Area of the BE, special status species and habitat were investigated and documented to determine the potential level of impacts associated with the Project. It is noted that the BE also investigated potential impacts associated with an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or another approved local, regional, or state habitat conservation plan. Therefore, based on the analysis and information provided herein, and implementation of the Mitigation Measures recommended in the BE prepared by qualified consultants LOA, the Project would result in a *less than significant cumulative impact*.

V. CULTURAL RESOURCES

Would the Project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?	☐	☐	☐	☑
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	☐	☑	☐	☐
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☑	☐	☐

It is noted that this IS/MND will rely on information provided by the Cultural Resources Assessment (CRA) prepared by qualified consultants Soar Environmental Consulting (Soar), including participation by Tribal representatives, was used to determine impacts to Cultural and Tribal Cultural Resources and is included as Appendix C. Where necessary, and if available, additional site-specific facts, data, information, etc., are included in this discussion. Results from a California Historic Resources Information System(CHRIS) search conducted on February 24, 2026, and a responses from the Native American Heritage Commission (NAHC) sacred lands files search (January 20, 2026 and February 24, 2026) are available in Appendix C.

SETTING

As excerpted from the CRA "This section of the report summarizes information regarding the physical and cultural setting of the Project area, including prehistoric, ethnographic, and historic contents of the general area. Several factors, including topography, biological resources, and available water sources, affect the nature and distribution of periods of cultural activity in an area. This background provides context for understanding the nature of the cultural resources that may be identified within the project region." (CRA, page 10).

Environmental Setting

"The Project area is located at an elevation range of ~900 ft. to 7,500 ft. in the Tule River Indian Reservation, in the southeastern region of Tulare County, approximately 15 to 20 miles east and southeast of the city of Porterville, California, on the eastern border of Porterville, California, within the Southern San Joaquin Valley.

The San Joaquin Valley is 250 miles long, extending from San Joaquin County in the North to Kern County in the South. The San Joaquin Valley borders on: Sierra Nevada (east), Sacramento-San Joaquin River Delta (north), Coast Range, San Francisco Bay (west), and Tehachapi Mountains (south) (California Department of Fish and Wildlife, 2005).

The region features rugged foothills and towering peaks of the southern Sierra Nevada mountains. Key landforms include the Sierra Nevada Foothills — the reservation lies amid the steep, rugged southern Sierra Nevada foothills, marked by dramatic canyons and prominent granite outcrops.
Slate Mountain — This peak, the highest in the South Fork Tule River Watershed at approximately 9,100–9,302 feet (sources vary slightly on exact summit elevation), rises as a dominant feature.

Other Prominent Peaks — Notable summits within or along the reservation boundaries include Solo Peak, Black Mountain, Mule Peak, and Cow Mountain.

Yowlumne Hills — This expansive 17,030-acre area of rolling hills and savannah-like landscapes, recently restored to the Tule River Indian Tribe in October 2025, acts as a vital ecological and cultural bridge linking the San Joaquin Valley floor to the higher Sierra Nevada mountains (Governor's Office, 2025).

Painted Rock, a sacred site featuring ancient petroglyphs, is located within the reservation boundaries. Geologically, the area includes metasedimentary rocks such as schist and slate, as well as limestone and dolomite deposits near the now-inactive Tule River tungsten mine (Tule River Indian Tribe, 2014).

The Tule River Indian Reservation features a dramatic elevational gradient of approximately 6,700 feet, rising sharply from the Central Valley foothills westward to the high peaks of the Sierra Nevada in the east. This steep ascent forms a "staircase" of varied environmental zones, influencing soil types, vegetation, and overall ecology across the rugged, rocky landscape that slopes upward from west to east. As elevation increases, distinct life zones emerge in a predictable progression, each supporting unique plant communities typical of the western Sierra Nevada slopes:

Below 3,000 ft:	Foothill woodlands and grasslands, often featuring blue oak, interior live oak, and savanna-like areas.
3,000–4,500 ft:	Chaparral and scrub woodlands.
4,500–5,500 ft:	Transition zone with ponderosa pine dominance.
5,500–7,000 ft:	Mixed-conifer forests, including species like incense cedar, sugar pine, white fir, and occasional giant sequoia.
Above 7,000 ft:	Subalpine forests with true firs and other high-elevation conifers.

This gradation in elevation—and the resulting variations in water availability, soil characteristics, and vegetation—directly shapes where people can settle, farm, and use

resources on the reservation, with lower elevations generally supporting communities and agriculture, while higher elevations focus on forest resources.

The average annual precipitation in the Southern San Joaquin Valley is from less than 4 inches in the southwest to about 10-15 inches in the east. Rainfall is highly seasonal, occurring mainly in winter. The South San Joaquin Valley has a hot-summer Mediterranean climate, characterized by extremely hot, arid summers and cold, foggy winters. Temperatures typically range from 39° to 98°F annually, rarely dropping below 29°F or exceeding 105°F. The frost-free season averages ~303 days (California Climate Commons, 2018)

- Soil Changes with Elevation: At lower elevations, particularly on the toe slopes, you'll find Tule loam—soft, loose, and easy to work with. As elevation increases, soils become noticeably rockier and much less developed, often consisting of loose, unconsolidated gravel and sand deposits.
- Water Supply Dynamics: Most water diversion for human use occurs in the lower sections of the river, yet these areas experience significant reductions in flow during late summer. In contrast the higher elevations function as the basin's essential "water towers," where accumulated snowpack provides the primary and most reliable source of water for the entire watershed Tule River Parkway Association, 2021" (CRA, pages 10-11).

"The Project area consists of a mix of native plants, and extensive fauna is known locally. The Tule River Indian Reservation, located on the western slopes of California's Sierra Nevada, spans a remarkable elevation range of roughly 6,700 feet—from about 900–1,000 feet in the western lowlands to peaks like Parker Peak near 7,600–7,643 feet. This steep gradient creates a classic sequence of Sierra vegetation zones. In the foothill zone (generally below ~3,000 feet), grasslands transition into oak woodlands and savannas (Schoenherr, 1992; Tule River Indian Tribe, 2024; Tule River Parkway Association, 2021)" (CRA, page 12). A complete list of flora and fauna are provided in the CRA, page 12.

"Surface soils consist of 80% Blasingame Sandy Loam series to the south, 50% Blasingame—Rock outcrop complex in the northern area, and Xerofluvents, flooded, in between. To the north is the Blasingame outcrop complex, and to the south is the Blasingame Sandy Loam.

The Blasingame Sandy Loam is 20-40 inches to paralithic bedrock. It is well-drained and formed into quartz residuum, weathered from diorite. The Blasingame soil series is made up of grayish-brown fine sandy loam at the surface with fine sandy loam below. It is located on the foothills with a slope percentage of 15-30%.

The Blasingame-Rock outcrop complex is 20-40 inches to paralithic bedrock. It is well-drained and formed into residuum from quartz, weathered from diorite. The Blasingame-Rock outcrop complex soil series consists of grayish-brown fine sandy loam at the surface, with brown fine sandy loam below. It is located in the foothills with a slope percentage of 9-50%.

The Xerofluvents are flooded active, recurring inundation by stream overflow that deposits new sediment and dictates the dry-wet climate cycle of the soil (USDA-United States Department of Agriculture, 1980). and is more than 80 inches deep. It is poorly-drained and is formed out of alluvium derived from igneous rock. The Xerofluvents are flooded and more than 80 inches deep. It is poorly-drained and is formed of alluvium derived from igneous rock. The Xerofluvents, flooded, are variable from 0 to 60 inches. It is located in valleys, with a slope percentage of 0-5% (United States Department of Agriculture, 1980)." (CRA, page 13).

Cultural Setting

As noted in the CRA, "Cultural resources include prehistoric-era archaeological sites, historic-era archaeological sites, Native American traditional cultural properties, sites of religious and cultural significance, and historical buildings, structures, objects, and sites. The importance of any single cultural resource is defined by the context in which it was first created, current public opinion, and evolving, modern analysis. From the analytical perspective, temporal and geographic considerations help to define the historical context of the Project area. The importance of a cultural resource is in part determined by the context in which it originated or developed. National Park Service Bulletin 16a (1997) describes a historic context as "information about historic trends and properties grouped by an important theme in the prehistory orhistory of a community, state, or the nation during a particular period of time." Context links an existing property to important historic trends, providing a framework for determining its significance. Given this, a major goal of the historian is to determine accurate themes of analysis, a task that can only be undertaken through a thorough review of previous researchers' ideas and the literature on the resources. In California, historians have divided the past into broad categories based on climate models, archaeological dating, and written histories. Paleontologists divide time into much larger segments, with defined and named periods that become shorter as the modern era is reached. For the purposes of this analysis, the following periods in history are summarized below." (CRA, pages 14-15).

Prehistoric Setting

The original inhabitants of the San Joaquin Valley were the Yokuts (also spelled Yokut), a group of Native American peoples comprising up to around 50–60 related tribes or dialect groups who spoke Yokut languages. They traditionally lived along rivers, creeks, and waterways that descend from the Sierra Nevada mountains, as well as around Tulare Lake. Today, descendants of these Yokuts people reside on the Tule River Indian Reservation, where they actively pursue goals of tribal sovereignty, self-governance, and economic self-sufficiency on their ancestral lands (Tule River Indian Tribe, 2024).

Climate change isn't a recent development. The region we now know as California has experienced cycles of warming and cooling, along with shifts between wet and dry conditions, which have long influenced its landscapes and the lives of its inhabitants. Some of the state's

oldest human artifacts—fluted spear points—have been discovered along the shores of Tulare Lake in the southern San Joaquin Valley. These tools date back to the close of the last Ice Age, roughly 13,500 to 11,500 years ago, soon after major glaciers retreated across much of North America. We know relatively little about the earliest people of California's Great Central Valley who crafted and used these implements, but they appear to have been nomadic groups that migrated in pursuit of game animals and seasonally available plants.

Between approximately 8,000 and 4,500 years ago, warmer, drier conditions accelerated the melting of the remaining glaciers and ice sheets in North America, Europe, and Asia. This meltwater drove a significant global rise in sea levels. The advancing Pacific Ocean inundated low-lying coastal areas, forming what are now San Francisco and San Pablo Bays, as well as the Sacramento-San Joaquin Delta. This marshy delta teemed with resources—fish, waterfowl, turtles, and mammals like vast herds of tule elk—enabling human groups to establish more permanent villages and remain in one location for extended periods. In contrast, other areas of present-day California grew extremely arid, making survival more challenging for residents there.

From about 4,000 to 1,000 years ago, the climate shifted to cooler conditions resembling today's patterns. Greater rainfall and snowmelt replenished previously dry lake beds and increased river flows into the Valley and Delta. Native populations in the state expanded substantially and thrived over these three millennia. Many archaeological deposits at site CA-SJO-3, for instance, date to the later part of this era, around 1,600 to 1,300 years ago.

Around 1,000 years ago, significant disruptions struck portions of California and the broader West. Archaeological records show heightened evidence of conflict and the abandonment of numerous settlements. Many researchers attribute this to extended droughts combined with growing human populations vying for scarce resources—a pattern still evident in various parts of the world today. Yet in California's Great Central Valley, major villages persisted, and new groups migrated into the region. The abundant Sacramento and San Joaquin Rivers ensured reliable supplies of food and water, sustaining a dynamic and resilient population. About 450 years ago, Indigenous communities in the Valley continued to expand, with shifting tribal boundaries. California's Native population likely peaked around this time, just before the arrival of Spanish soldiers and missionaries, whose presence triggered profound and devastating transformations.

Today, the Great Central Valley bears the deep imprint of human modification. Many Sierra-fed rivers are now dammed and their natural flows regulated. Rivers and sloughs that once wandered freely and flooded during winter storms are confined by levees, engineered channels, and irrigation ditches. Vast marshes have been drained for housing and development, while arid zones have been transformed into irrigated farmland. Numerous native animals have vanished or declined sharply—the grizzly bear has been extirpated from the state, and once-expansive herds of tule elk and pronghorn are now confined to small, scattered populations. (Norton, 2009).” (CRA, pages 15-16).

Ethnographic Setting

As descrbied in the CRA, “The project area lies within the traditional territory of the Penutian-speaking Yokuts people, who historically inhabited the southern San Joaquin Valley and adjacent portions of the Sierra Nevada. Key ethnographic accounts of the Yokuts come from sources such as Powers (1971, 1976 [originally 1877]), Kroeber (1925), Gayton (1930, 1948), Driver (1937), Latta (1977), and Harrington (n.d.). Due to various historical factors, much of the available documentation focuses on the central Yokuts groups, particularly those in the valley and Sierra foothills. The northern Yokuts experienced significant impacts from Euro-American settlement during the Gold Rush, resulting in a sharp population decline before major ethnographic work began in the early 20th century. Southern groups experienced partial displacement through Spanish missions and later incorporation into multi-tribal communities at places such as the Sebastian Indian Reservation (on Tejon Ranch), the Tule River Reservation, and the Santa Rosa Rancheria farther north. This has resulted in relatively limited ethnographic detail for the southern valley Yokuts compared to the richer records from central foothill groups, where speakers of Yokuts dialects persist today.

Despite these gaps, core aspects of Yokuts' lifeways—such as subsistence strategies shaped by the environment and religious beliefs and practices—were broadly consistent across their territory. This lack of specificity is especially noticeable regarding the distribution of southern valley tribal groups. The San Joaquin Valley floor, including the study area, was home to southern valley Yokuts speakers, who were organized into numerous autonomous tribelets with boundaries that remain poorly defined. Among them: The Yauelmani (also spelled Yawelmani or Yowlumne) occupied areas from the Kern River vicinity (near modern Bakersfield) southeastward to the Tejon Ranch area. The Hometwali centered around Kern Lake. The Tulamni lived along the western side of Buena Vista Lake and extended into the Temblor foothills, at least as far as McKittrick. The Tuhohi inhabited regions from the Kern River delta northward to the Goose Lake area and westward to sloughs near Buttonwillow.

Yokuts settlements reached up to—but generally did not enter—the canyon mouths along the northern and western slopes of the Tehachapi Mountains, extended well into the Sierra Nevada foothills and lower elevations on the east, and reached the crest of the Temblor Range on the west. As Penutian speakers, the Yokuts were linguistically connected to northern groups in the San Joaquin Valley. Yokuts settlement patterns showed considerable uniformity across groups. Winter villages were usually situated along lake shores and major streams (as they existed around AD 1800), while seasonal family camps dispersed to higher spots on the valley floor and near resource-gathering areas in the foothills. Most Yokuts groups, including those mentioned, functioned as distinct tribelets—land-owning units centered on a main village, united by shared territory and common ancestry. Tribelet populations typically ranged from about 150 to 500 individuals (Kroeber, 1925). Leadership in each tribelet was vested in a chief, supported by assistants, with the winatum (herald, messenger, and assistant chief) being especially prominent.

A shaman held a key religious role. Although shamans lacked formal political power, they wielded considerable influence within the community, as Gayton (1930) illustrates. Shamanism, widespread among Native American groups, involved a personal connection to the supernatural achieved through trance states, often induced by psychotropic plants such as jimsonweed or, more commonly, native tobacco. Shamans were viewed as possessing exceptional supernatural abilities; they acted as healers, diviners, and controllers of natural forces (e.g., rain or thunder). They also created the region's rock art, which depicted visions from quests involving spirit helpers and supernatural events (Whitley, 1992, 2000). Shamanism played a central role in the Yokuts' religious life, as evidenced by their annual ceremonial cycle. This yearly round followed a consistent pattern: it began in spring with the Jimsonweed ceremony, followed by the rattlesnake dance and (where relevant) first salmon rites. After summer seed-gathering camps, fall ceremonies included the mourning ceremony, first seed and acorn rituals, and the bear dance (Gayton, 1930). Shamans officiated at these events, leading dances that showcased their supernatural powers (Kroeber, 1925).

Subsistence varied somewhat by local environment and tribelet, but acorns formed a staple food across Yokuts territory, supplemented by various gathered seeds. Valley groups also relied heavily on lake and river resources, including fish and waterfowl. Like many California Native groups, Yokuts followed a seasonal pattern: aggregating in larger winter villages supported by stored foods (especially acorns), then dispersing into smaller family-based camps to exploit seasonal resources. Although estimates differ and populations were severely reduced by Euro-American diseases and disruption, the Yokuts ranked among California's largest and most successful Indigenous groups. Cook (1978) suggested their region held about 27 percent of the state's pre-contact Aboriginal population, with some estimates even higher. Today, many Yokuts descendants continue to live in the southern San Joaquin Valley." (CRA, pages 16-17)

Indigenous Groups of the Tule River Region Yokuts (The Majority Group)

The Yokuts were the primary inhabitants of the southern San Joaquin Valley. Historically, they comprised approximately 60 distinct tribes and more than 50 dialect groups.

- Vicinity Tribes: The Koyeti lived in the western lowlands, while the Yandanchi (also known as Yaudanchi) occupied the eastern foothills near the North and Middle Forks of the Kaweah River.

- Other Key Bands: Prominent Yokuts groups associated with the Tule River Tribe today include the Yowlumne and Wukchumni. Historical records also mention several other bands that lived on the original Tule River Farm/reservation, including the Chunuts, Yokodo, Kaweah, Punkalachi, and Kumaachisi.

Western Mono (Monache)

The Western Mono are a Shoshonean-speaking people whose traditional territory extended along the western slope of the Sierra Nevada, between the Fresno and Tule Rivers. They primarily occupied the higher foothills and the upper drainage of the Kaweah River, spending most of the year in the lower hill country.

Tubatulabal ("Pine-Nut Eaters")

The Tubatulabal are indigenous to the Kern River Valley and are considered among the earliest permanent residents of that area. Their traditional culture shared many similarities with the Yokuts. They also served as important intermediaries in extensive trade networks linking the Great Basin, the Central Valley, and coastal groups.

Additional Groups Relocated Before 1873

- Owens Valley Paiute: After the Owens Valley Indian War of 1863, roughly 350 Owens Valley Paiutes were forcibly relocated from Fort Tejon to the Tule River Farm. This relocation nearly doubled the settlement's population at the time.

- Other Scattered Bands: The 1873 Executive Order formally designated the Tule River Reservation as a home for displaced "scattered bands," including groups from the Kings River and Monache Cajon areas. Many of these people had been driven from their lands by the Gold Rush and expanding settler encroachment.

The Tule River Indian War of 1856

The Tule River Indian War was a short but intense six-week conflict that took place in the southern San Joaquin Valley in 1856. It was fought primarily between local Yokuts tribes and settler-led militias, later drawing in the California State Militia and the U.S. Army. The war represented the breaking point after years of rising tensions caused by settler encroachment on indigenous lands and repeated failures by the U.S. government to honor its promises.

Failed Treaties

In 1851, the U.S. government negotiated 18 treaties with California tribes (including the Treaty of Point Creek), promising to protect their lands and resources. In a secret vote in 1852, the U.S. Senate rejected all of them, leaving the tribes without legal protection or the food supplies they had been promised.

The Pretext

The conflict was triggered by rumors that Native Americans had stolen 500 head of cattle and burned a sawmill. Later investigations showed that only a single calf had been taken for a

wedding feast and that the exaggerated claims were largely used as a pretext by settlers to justify clearing Indigenous people from the land.

Outcome and Impact

- Casualties: Roughly 100 Native Americans lost their lives during the war, while settler casualties were limited to a few wounded.
- Creation of the Reservation: In response to the violence and to prevent widespread starvation, the U.S. government established the Tule River Farm (the forerunner of today's Tule River Indian Reservation) later that same year.

- Historical Legacy: Many historians regard the Tule River War as an avoidable tragedy. They argue that settlers exploited minor incidents as an excuse for the "wanton killing" and forced displacement of Indigenous groups." (CRA, pages 17-19).

Historic Setting

In California, the historic era is divided into three general periods: the Spanish or Mission Period (1769 to 1821), the Mexican or Rancho Period (1821 to 1848), and the American Period (1848 to present). The mission system, which ultimately established 21 missions between 1796 and 1822, consisted of missions, presidios, and pueblos, and was designed to convert the indigenous peoples of California to Christianity and assimilate them under Spanish rule (Gudde, 1998).

The Spanish Period saw exploration and the establishment of the San Diego Presidio and missions at San Diego (1769) and San Luis Rey (1798), and Asistencias (chapels) to the San Diego Mission at Santa Ysabel (1818) and to the San Luis Rey Mission at Pala (1816). Horses, cattle, agricultural foods, and weed seeds, and a new architectural style and method of building construction were also introduced. Spanish influence continued after 1821, when California became part of Mexico, yet the missions continued to operate for a short time longer, and laws governing land distribution were retained.

In 1821, Mexico won independence and control of the Spanish American colonies from Spain. Land was allowed to be redistributed, and the native neophytes were freed from church jurisdiction as a result of the Secularization Act of 1833. During this period of secularization, the Mexican authorities in Alta California made numerous large land grants on former mission properties; many became private ranches, or ranchos; the vast majority were issued by the Mexican government (Robinson, 1979). The Mexican Period ended in 1848 as a result of the Mexican-American War.

The American period began with the signing of the Treaty of Guadalupe Hidalgo between Mexico and the United States in 1848. As a result of the treaty, the former Mexican province of Alta California became part of the United States as the territory of California. Rapid population increase occasioned by the Gold Rush of 1849 allowed California to become a state in 1850.

Most Mexican land grants were confirmed to the grantees by U.S. courts, but usually with more restricted boundaries, which were surveyed by the U.S. Surveyor General's office.

The original inhabitants of the San Joaquin Valley were the Yokut-speaking tribes- about 50 dialect groups occupying the territory along the rivers and creeks flowing from the Sierras and around the Tulare Lake. Their descendants today on the Tule River Indian Reservation continue to have the goal of self-government and self-sufficiency on the land.

When gold was discovered in 1848, California was under American military occupation in the war against Mexico. Thousands of American prospectors poured into the territory. California statehood followed in 1850, and everything changed for the native people of the Great Central Valley. Although Spain, and later Mexico, had sent forays into the interior of California for a century and a half, the Indians of the foothills of the Sierras were relatively well protected. They were the safest of any California Indians from military expeditions, capture, and forced conversion at the missions. With the Gold Rush and California statehood, disease decimated the population.

The ravages of disease were compounded by injustice and starvation. In 1860, the Indian population in California was only 20% of what it had been ten years earlier (Norton, 2009). (CRA, pages 19-20).

Regulatory Setting

Federal

As noted in the CRA, "Federal regulations for cultural resources are governed primarily by Section 106 of the National Historic Preservation Act (NHPA) of 1966. Section 106 of the NHPA requires Federal agencies to consider the effects of their undertakings on historic properties and affords the Advisory Council on Historic Preservation a reasonable opportunity to comment on such undertakings. The Council's implementing regulations, "Protection of Historic Properties," are found in 36 Code of Federal Regulations (CFR) Part 800. The goal of the Section 106 review process is to provide a measure of protection to sites determined eligible for listing on the National Register of Historic Places. The criteria for determining National Register eligibility are found in 36 CFR Part 60. Amendments to the NHPA (1986 and 1992) and subsequent revisions to the implementing regulations have, among other things, strengthened the provisions for Native American consultation and participation in the Section 106 review process. While federal agencies must follow federal regulations, most projects by private developers and landowners do not require this level of compliance. Federal regulations only come into play in the private sector if a project requires a federal permit or uses federal funds." (cr, page 5)

State

California Environmental Quality Act (CEQA)

Under CEQA, a historical resource is a resource listed in, or determined to be eligible for listing in, the CRHR. Historical resources may include, but are not limited to, "any object, building, structure, Site, area, place, record, or manuscript which a lead agency determines to be historically or archaeologically significant" (PRC §5020.1[j]). In addition, a resource included in a local register of historical resources or identified as significant in a local survey conducted per the state guidelines is also considered a historic resource under California Public Resources Code (PRC) Section 5020.1.

CEQA details appropriate measures for the evaluation and protection of cultural resources in §15064.5 of the CEQA Guidelines. According to CEQA guidelines §15064.5 (a)(3), the criteria for listing on the CRHR includes the following:

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

According to CEQA guidelines §21074 (a)(1), criteria for tribal cultural resources includes the following:

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

1. *Included or determined to be eligible for inclusion in the California Register of Historical Resources.*
2. *Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.*

Protection of cultural resources within California is additionally regulated by PRC §5097.5, which prohibits the destruction, defacing, or removal of any historic or prehistoric cultural features on land under the jurisdiction of State or local authorities.

California Register of Historical Resources

In California, the term "historical resource" includes "any object, building, structure, site, area, place, record, or manuscript which is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California" (California PRC § 5020.1[j]) (State of California, 2021). In 1992, the California legislature established the California Register of Historical Resources

(CRHR) "to be used by state and local agencies, private groups, and citizens to identify the state's historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change" (California PRC § 5024.1(a)). The criteria for listing resources on the CRHR, enumerated below, were developed to align with previously established criteria for listing in the NRHP. According to California PRC § 5024.1(c) (1–4), a resource is considered historically significant if it (i) retains "substantial integrity," and (ii) meets at least one of the following criteria:

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

To understand the historic importance of a resource, sufficient time must have passed to obtain a scholarly perspective on the events or individuals associated with the resource. A resource less than 50 years old may be considered for listing in the CRHR if it can be demonstrated that sufficient time has passed to understand its historical importance (14 CCR 4852[d][2]).

The CRHR protects cultural resources by requiring evaluations of the significance of prehistoric and historic resources. The criteria for the CRHR are nearly identical to those for the National Register of Historic Places (NRHP), and properties listed or formally designated as eligible for listing in the NRHP are automatically listed in the CRHR, as are state landmarks and points of interest. The CRHR also includes properties designated under local ordinances or identified through local historical resource surveys.

Health and Safety Code, Section 7050.5(b) and CEQA Section 15064.5

Section 7050.5(b) of the California Health and Safety Code specifies protocol when human remains are discovered during activities involving ground disturbance. If human remains are discovered or identified in any location other than a dedicated cemetery, there should be no further disturbance or excavation nearby until the county coroner has determined the area is not a crime scene that warrants further investigation into the cause of death and made recommendations to the persons responsible for the work in the manner provided in PRC Section 5097.98. This section provides guidance for proceeding when human remains associated with Native American burials and associated items are encountered. CEQA Guidelines Section 15064.5(e) requires that excavation activities stop whenever human remains are uncovered during a project or activity, and that the county coroner be called in to assess the remains. If the county coroner determines that the remains are Native American, the Native American Heritage Commission (NAHC) must be contacted within 24 hours. At that

time, the lead agency must consult with the appropriate Native American descendants, if any, as identified by the NAHC. Under certain circumstances, the lead agency (or applicant), is required to develop an agreement with the Native American descendants for the treatment and disposition of the remains. In addition to the mitigating provisions pertaining to accidental discovery of human remains, Section 15064.5(f) of the CEQA Guidelines also requires that a lead agency make provisions for the accidental discovery of historical or archaeological resources, generally. These provisions should include an immediate evaluation of the find by a qualified archaeologist. If the find is determined to be a Historical Resource or Unique Archaeological Resource, avoidance measures should be implemented, or appropriate mitigation should be available.

Public Resources Code Section 5097.9 PRC Section 5097.9 states that no public agency or private party on public property shall interfere with the free expression or exercise of Native American religion. The code further states that: …nor shall any such agency or party cause severe or irreparable damage to any Native American sanctified cemetery, place of worship, religious or ceremonial site, or sacred shrine located on public property, except on a clear and convincing showing that the public interest and necessity so require. County and city lands are exempt from this provision, except for parklands larger than 100 acres. Government Code Section 65352.3-5 (Senate Bill 18) California Government Code Section 65352.3-5, formerly known as Senate Bill (SB) 18, states that prior to the adoption or amendment of a city or county's general plan, or specific plans, the city or county shall consult with California Native American tribes that are on the contact list maintained by the NAHC. The intent of this legislation is to preserve or mitigate impacts on places, features, and objects, as defined in PRC 5097.9 and PRC 5097.993, that are within the city or county's jurisdiction. The bill also states that the city or county shall protect the confidentiality of information concerning the specific identity, location, character, and use of those places, features, and objects identified by Native American consultation. Government Code 65362.3-5 applies to all general and specific plans and amendments proposed after March 1, 2005. Assembly Bill 52 Effective July 1, 2015, Assembly Bill (AB) 52 amended CEQA to require that: (1) a lead agency provide notice to those California Native American tribes that requested notice of projects proposed by the lead agency; and (2) the lead agency consult with any tribe that responded to the project notice within 30 days of receipt with a request for consultation. Topics that may be addressed during consultation include Tribal Cultural Resources, the potential significance of project impacts, the type of environmental document that should be prepared, and possible mitigation measures and project alternatives. A California Native American tribe is defined as "…a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of the Statutes of 2004." This includes both federally and non-federally recognized tribes.

California State Assembly Bill 52

Assembly Bill (AB) 52 of 2014 amended California PRC § 5097.94, and added California PRC §21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2, and 21084.3. AB 52 established that

tribal cultural resources must be considered under CEQA and also provided for additional Native American consultation requirements for the lead agency. California PRC §21074 defines Tribal Cultural Resources for the purpose of CEQA as:

1) Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:
   A. Included or determined to be eligible for inclusion in the California Register of Historical Resources.
   B. Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1

2) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe. A cultural landscape that meets the criteria of subdivision:

   (a) is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape.
   (b) A historical resource described in §21084.1, a unique archaeological resource as defined in subdivision (g) of §21083.2, or a "nonunique archaeological resource" as defined in subdivision (h) of §21083.2 may also be a tribal cultural resource if it conforms with the criteria of subdivision (a).

AB 52 formalizes the lead agency–tribal consultation process, requiring the lead agency to initiate consultation with California Native American tribes listed on the Native American Heritage Commission (NAHC) contact list. This includes California Native American groups that are traditionally and culturally affiliated with the project, including tribes that may not be federally recognized. Lead agencies are required to begin consultation prior to the release of a negative declaration, mitigated negative declaration, or environmental impact report (EIR).

Section 9 of AB 52 establishes that "a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment." Section 6 of AB 52 added §21080.3.2 to the California PRC, which states that parties may propose mitigation measures "capable of avoiding or substantially lessening potential significant impacts to a tribal cultural resource or alternatives that would avoid significant impacts to a tribal cultural resource." Further, if a California Native American tribe requests consultation regarding Project alternatives, mitigation measures, or significant effects to tribal cultural resources, the consultation shall include those topics (California PRC §21080.3.2[a]). The environmental document and the mitigation monitoring and reporting program (where applicable) shall include any mitigation measures that are adopted (California PRC §21082.3[a]).

Native American Human Remains

State law (California PRC §5097 et seq.) addresses the disposition of Native American burials in archaeological sites and protects such remains from disturbance, vandalism, or inadvertent destruction; establishes procedures to be implemented if Native American skeletal remains are discovered during construction of a project; and established the NAHC.

In the event that Native American human remains, or related cultural material, are encountered, §15064.5(e) of the CEQA Guidelines (as incorporated from PRC §5097.98) and California Health and Safety Code, §7050.5, define the subsequent protocol. In the event of the accidental discovery or recognition of any human remains, excavation or other disturbances shall be suspended on the site, or any nearby area reasonably suspected to overlie adjacent human remains or related material. Protocol requires that the County Coroner or County-approved Coroner be contacted in order to determine if the remains are of Native American origin. Should the coroner determine the remains to be Native American, the coroner must contact the NAHC within 24 hours. The most likely descendant may make recommendations to the landowner or the person responsible for the excavation work for means of treating, with appropriate dignity, the human remains, and any associated grave goods as provided in California PRC §5097.98 (14 CCR 15064.5(e))(State of California, 2021).

Local

Tulare County

Chapter 8.6 of the Tulare County General Plan of 2012 promotes the preservation of cultural and historic resources through managing and protecting sites of cultural and archeological importance for the benefit of present and future generations (County of Tulare 2012). Some of the measures implemented by the County are:

ERM-6.1 Evaluation of Cultural and Archaeological Resources - The County shall participate in and support efforts to identify its significant cultural and archaeological resources using appropriate State and Federal standards.

ERM-6.2 Protection of Resources with Potential State or Federal Designations - The County shall protect cultural and archaeological sites with demonstrated potential for placement on the National Register of Historic Places and/or inclusion in the California State Office of Historic Preservation's California Points of Interest and California Inventory of Historic Resources. Such sites may be of Statewide or local significance and have anthropological, cultural, military, political, architectural, economic, scientific, religious, or other values as determined by a qualified archaeological professional.

ERM-6.3 Alteration of Sites with Identified Cultural Resources - When planning any development or alteration of a site with identified cultural or archaeological resources, consideration should be given to ways of protecting the resources. Development can be permitted in these areas only after a site-specific investigation has been conducted pursuant to CEQA to define the extent and value of the resource, and mitigation measures proposed for any impacts the development may have on the resource.

ERM-6.4 Mitigation - If preservation of cultural resources is not feasible, every effort shall be made to mitigate impacts, including relocation of structures, adaptive reuse, preservation of facades, and thorough documentation and archival of records.

ERM-6.5 Cultural Resources Education Programs - The County should support local, State, and national education programs on cultural and archaeological resources.

ERM-6.6 Historic Structures and Sites - The County shall support public and private efforts to preserve, rehabilitate, and continue the use of historic structures, sites, and parks. Where applicable, preservation efforts shall conform to the current Secretary of the Interior's Standards for the Treatment of Historic Properties and Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings.

ERM-6.7 Cooperation of Property Owners - The County should encourage the cooperation of property owners to treat cultural resources as assets rather than liabilities, and encourage public support for the preservation of these resources.

ERM-6.8 Solicit Input from Local Native Americans - The County shall continue to solicit input from the local Native American communities in cases where development may result in disturbance to sites containing evidence of Native American activity and/or to sites of cultural importance.

ERM-6.9 Confidentiality of Archaeological Sites - The County shall, within its power, maintain confidentiality regarding the locations of archaeological sites in order to preserve and protect these resources from vandalism and the unauthorized removal of artifacts.

ERM-6.10 Grading Cultural Resources Sites - The County shall ensure all grading activities conform to the County's Grading Ordinance and California Code of Regulations, Title 20, § 2501 et. seq

Native American Reservation Cultural Resource Laws and Federal, State, and Local Laws

As noted in the CRA, "Federal, state, and local cultural resource laws can apply to Native American tribal reservations, though their application, scope, and enforcement vary significantly due to tribal sovereignty and the complex interplay of jurisdictions. Certain federal laws specifically protect tribal cultural resources and apply directly to reservations or tribal

lands. Key examples include the Native American Graves Protection and Repatriation Act (NAGPRA), which governs the protection, repatriation, and handling of Native American human remains, funerary objects, sacred objects, and items of cultural patrimony—particularly on federal or tribal lands—and the Indian Arts and Crafts Act, which safeguards authentic Native American arts and crafts from misrepresentation.

Other federal statutes, such as aspects of the National Historic Preservation Act (NHPA) or Archaeological Resources Protection Act (ARPA), may involve tribal consultation for projects affecting cultural sites, even on tribal lands, especially when federal involvement (e.g., funding, permits, or undertakings) is present. However, enforcement of these laws can be inconsistent, and no single, comprehensive federal framework fully guarantees the long-term preservation and vitality of tribal cultures. State laws may have limited applicability on reservations because tribes generally are not subject to state jurisdiction due to their sovereign status. The relationship is further complicated by dual citizenship: tribal members are citizens of both their tribe and the United States, subjecting them to federal (and sometimes state) laws alongside tribal ones. This creates a layered system of rights and obligations that tribes, federal agencies, and others may not always fully navigate. In limited areas, such as criminal matters, federal law can incorporate state provisions—for instance, under the Assimilative Crimes Act, certain state criminal violations become federal offenses on reservations. Yet this does not mean all federal (or state) laws automatically extend to every aspect of reservation life or tribal governance.

The fundamental dynamic is a government-to-government relationship between the United States and each federally recognized tribe, with each tribe maintaining its own sovereign legal system and authority. Not every federal law applies uniformly across all reservations. To navigate this effectively, federal agencies, state entities, and local authorities must recognize the unique legal status of reservations, honor tribal sovereignty, and respect tribal traditions. This includes meaningful government-to-government consultation—incorporating tribal input and perspectives—especially for projects or decisions that could affect historic properties, sacred sites, or other cultural resources (Governor's Office of Tribal Affairs, 2026)." (CRA, pages 9-10).

FIELD SURVEY METHODS AND RESULTS

"The basic criteria for determining the presence of prehistoric and historic cultural resources in local urban and rural settings generally include:

- Presence of flaking debris derived from stone tool manufacturing
- Presence of marine shell and/or other faunal remains
- Occurrence of material culture artifacts
- Surface expressions of cultural features
- Bedrock mortars and related milling features or components
- Soil discolorations or atypical soil manifestations

- Stone or adobe features associated with structural remains
- Diagnostic ceramics derived from Spanish, Mexican, or later historic periods
- Historic iron and glassware, cans, privy pits, and domestic occupational debris

Soar Environmental Principal Archaeologist Heather Froshour, M.A., R.P.A., conducted the field survey of the Project area on March 17, 2026, in coordination with the Tule River Indian Tribe. The Project area was examined through systematic pedestrian inspection of the ground surface. Transect spacing ranged from approximately 15 to 20 feet (4.5 to 6 meters), depending on surface conditions and visibility.

The approximately 48.8-acre Project area consists mostly of residential homes but is also located in the main village of the Tule River Indian Reservation, where there are other buildings, such as a gymnasium (Figures 5-12). The surface visibility of the Project area, defined as the approximate percentage of native soils visible during the field survey of a given project component, was estimated at 10-20%. The ground surface was covered by decomposed granite and very few non-native grasses, with heavily overgrown vegetation around the River, making surface identification very difficult. There is one recorded cultural resource within the Project area or radius that is listed as a California State Historic Landmark, No. 388. The landmark is the First Tule River Indian Reservation. A reservation was originally established in 1857. The reservation was moved to its present location, 10 miles to the southeast, in 1873.

Of the previously recorded resources within the Project area, three were relocated: P-54-000423, P-54-000424, and P-54-000425. Five resources not relocated are located on private property or covered by dense vegetation and were inaccessible during the current field survey. No additional in situ cultural resources or isolated materials potentially derived from primary or secondary archaeological contexts were observed on the surface of the Project area.

Based on these findings, the development of the Tule River Complete Streets Project has the potential to adversely affect previously recorded cultural resources (P-54-000417, P-54-000422, P-54-000423, P-54-000424, P-54-000425, P-54-000430, P-54-000434, and P-54-000436) that are culturally sensitive to Native American communities."(CRA, page 23).

Discussion

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

No Impact: On February 24, 2026, qualified consultants Soar Environmental requested that the Central California Information Center (Information Center or CCIC), California Historical Resources Information System (CHRIS), Department of Anthropology – California State University, Bakersfield for the specific Project area and the immediate vicinity of the Project

area. CHRIS results were received on March 9, 2026 (see Appendix C). As noted in the CRA, searches by CHRIS included the following:

- "California Points of Historical Interest (CPHI)
- California Historical Landmarks (CHL)
- California Register of Historical Resources (CRHR)
- National Register of Historic Places (NRHP)
- Historic maps (U.S. Geological Survey topographic quadrangles, General Land Office plats)
- Historical aerial imagery
- Caltrans Historical Bridge Inventory

The records search identified eight prior cultural resources investigations within the Project area. These investigations primarily involved cultural and historic property evaluations of the Tule River Indian reservation, utility line replacement, and fire management surveys." (CRA page 20).

Records Search Results

As indicated in the CRA, "The results of the records search, received on March 9, 2026, indicate that eight cultural resource studies have been conducted within the Project area (Table 1 [of the CRA]). According to the information on file, there are eight resources within the Project area (Table 2 [of the CRA]). There are 19 recorded resources within the 0.5-mile record search radius, and 12 additional studies identified within a 0.5-mile radius of the Project area. Resource records can be found in Appendix B [of the CRA]." (CRA, page 20). The complete list of studies can be found on pages 21-22 of the CRA.

Sacred Lands File & Native American Contacts List Request

"On February 24, 2026, Soar Environmental Consulting, Inc. (Soar) requested a Sacred Lands File (SLF) search and Native American contact list from the California Native American Heritage Commission (NAHC) to identify tribes culturally and geographically affiliated with the Oakstone Resort Yosemite Project area.

On February 24, 2026, the NAHC, through Cultural Resources Analyst Pricilla Torres-Fuentes, confirmed positive results for Native American traditional cultural places or sacred sites within or near the Project area. The NAHC also provided a list of ten individuals representing seven Tulare County Native American tribal groups within the region (Appendix C).

As the proposed Project is entirely on an Indian Reservation, Soar Principal Archaeologist, Heather Froshour, M.A., R.P.A., consulted the Tule River Tribe, which utilizes the reservation, via verbal communication, and was informed that none of the tribal members had any questions or concerns." (CRA, page 22).

As determined in the CRA, "There appears to be a high likelihood of subsurface cultural resources in the Project area, based on archival research and the detection of eight known resources during previous disturbances. There are no recorded cultural resources within the Project area that are listed in the National Register of Historic Places, Office of Historic Preservation's (OHP) Built Environment Resource Directory (BERD), the California Points of Historical Interest, or the California Register of Historical Resources. There is one recorded resource within the Project area listed as a California State Historic Landmark: No. 388, the First Tule River Indian Reservation.

The intensive Phase I pedestrian survey was conducted on March 17, 2026, using parallel transects spaced at 15 to 20 feet (4.5 to 6 meters) across the Project area. Three previously recorded resources were relocated during the survey: P-54-000423, P-54-000424, and P-54-000425. Five resources not relocated are located on private property or covered by dense vegetation and were inaccessible during the current field survey. No additional in situ cultural resources or isolated materials potentially derived from primary or secondary archaeological contexts were observed on the surface of the Project area.

Due to the presence of highly sensitive cultural resources within the Project area and a previously identified area of Native American Concern overlapping the whole of the Project area, the high potential for additional resources due to regional and environmental factors, NAHC results indicating the Project is positive for sacred lands, recorded Native American burials just north of the Project area, and the proximity of proposed ground-disturbing activities to known cultural resources, Mitigation Measures have been outlines in the section below."(CRA, page 28).

The CRA notes, "Construction of the Project would not cause a substantial adverse change in the significance of a historical resource pursuant to PRC Section 15064.5. The Project area was surveyed for potential historical resources and evaluated for NRHP and CRHR eligibility. No historical resources were identified within or adjacent to the Project footprint. Therefore, there would be no significant adverse effect on historical resources, and construction will not impact any historical resources under PRC Section 15064.5." (CRA, page 29).

Therefore, based on the information and analysis contained herein, and the CRA (Appendix C) provided by qualified consultants Soar Environmental Consulting, the Project would result in a no impact.

Mitigation Measures: None required.

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

Less Than Significant Impact with Mitigation Incorporated: The CRA notes, "Given the landform age and geographic setting, there remains a potential for previously unknown buried archaeological deposits to be encountered during ground disturbance. Although large portions of the Project area have been graded or otherwise disturbed, this does not preclude the possibility of buried intact deposits.

If such deposits are encountered, they could be subject to demolition, destruction, or alteration, impairing their significance under PRC Section 15064.5(b)(1). Consequently, the Project could result in a substantial adverse change to an archaeological resource.

To reduce this potential impact, Mitigation Measures CUL-1 and CUL-2 require Cultural Resources Awareness Training, preconstruction coordination, and implementation of stop-work procedures in the event of an inadvertent discovery. Implementation of these measures would reduce impacts to a less-than-significant level." (CRA, page 29)

Therefore, based on the analysis and information provided herein, and the CRA (Appendix C) provided by qualified consultants Soar Environmental Consulting, the impact would be *less than significant with mitigation incorporated.*

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

Less Than Significant Impact with Mitigation Incorporated: The CRA indicates that, "Archival map and aerial reviews identified no dedicated cemeteries within the Project footprint. The nearest known cemetery, Tule River Reservation Lower Cemetery, is located approximately 0.29 miles east-southeast. No human remains were encountered during the records search, Sacred Lands File review, or pedestrian survey.

While the likelihood of encountering human remains is low, any inadvertent discovery of remains during construction would constitute a potentially significant impact. Compliance with Health and Safety Code Section 7050.5 and PRC Section 5097.98, including stop-work and notification procedures, would ensure that impacts remain less than significant following implementation of Mitigation Measure CUL-3." (CRA, page 29).

MM CUL-3: Inadvertent Discovery of Human Remains: If human remains are encountered during construction, all work in the vicinity shall cease. The Tulare County Coroner shall be notified immediately. If the remains are determined to be Native American, the NAHC shall be notified in accordance with PRC Section 5097.98, and a Most Likely Descendant shall be identified. The County and the descendant shall confer to determine appropriate treatment and disposition of the remains. Construction shall not resume until approved by the County and the qualified archaeologist.

In the unlikely event that human remains are unearthed during construction-related activities, Mitigation Measure CUL-2 would be implemented to minimize the impact of such a discovery. Therefore, based on the analysis and information provided herein, and the CRA (Appendix C) provided by qualified consultants Soar Environmental Consulting, the Project would result in a *less than significant with mitigation incorporated*.

Mitigation Measures for Impacts on Cultural Resources

The following mitigation measures have been excerpted verbatim from the CRA (see Appendix C) prepared by qualified consultants Soar Environmental Consulting.

Mitigation Measure (MM) CUL-1 Cultural Resources Awareness Training: Before ground-disturbing activities, a qualified archaeologist shall conduct Cultural Resources Awareness Training for all construction personnel. The training shall include examples of potential cultural materials, reporting protocols, penalties for unauthorized disturbance, and procedures for immediate notification of the archaeologist. Attendance shall be documented on a sign-in sheet retained by the contractor and provided to the Tule River Indian Reservation and Tulare County upon completion of construction.

MM CUL-2: Inadvertent Discovery of Archaeological Resources: Ground-disturbing activities shall be located at least 100 feet (30 meters) from known archaeological resources. If resources are discovered, work within 100 feet (30 meters) of the find shall halt immediately, and the area shall be protected from further disturbance. The archaeologist, in consultation with a Native American representative, shall evaluate the find for significance and recommend treatment consistent with CEQA Guidelines Section 15126.4(b)(3)(C). Avoidance shall be the preferred mitigation; if avoidance is infeasible, data recovery or other appropriate treatment may be implemented. Construction shall resume only after approval by the qualified archaeologist.

MM CUL-3: Inadvertent Discovery of Human Remains: If human remains are encountered during construction, all work in the vicinity shall cease. The Tulare County Coroner shall be notified immediately. If the remains are determined to be Native American, the NAHC shall be notified in accordance with PRC Section 5097.98, and a Most Likely Descendant shall be identified. The County and the descendant shall confer to determine appropriate treatment and disposition of the remains. Construction shall not resume until approved by the County and the qualified archaeologist.

Therefore, based on the analysis and information provided herein and implementation of Mitigation Measures CUL-1 through CUL-3, as applicable, impacts to this resource would be *less than significant with mitigation incorporated.*

Cumulative Impact

The geographic area of this cumulative analysis is limited to the Tule River Reservation. As noted earlier, the Project site does not include any known historical, cultural, or archaeological resources. Also as noted earlier, this analysis relies on the information, determinations, technical studies, etc., and information provided in the CRA (Appendix C) prepared by qualified consultants Soar Environmental Consulting working with representatives of the Tule River Tribal Tribe. The CHRIS and NACH search results indicate that there are no known resources on the Project site. However, as an abundance of caution, Mitigation Measures CUL-1 through CUL-3 are incorporated herein to minimize impacts in the unlikely event that any resources applicable to this Checklist Item are discovered. Known and unknown resources would be avoided, protected, and/or curated by Tule River Reservation representatives. Therefore, based on the analysis and information provided herein, and with implementation of Mitigation Measures CUL-1 through CUL-3 as applicable, cumulative impacts of the Project would be *less than significant with mitigation*.

VI. ENERGY

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

Environmental Setting

Electricity and Natural Gas Electricity is quantified using kilowatts (kW) and kilowatt-hours (kWh). A kW is a measure of 1,000 watts of electrical power and a kWh is a measure of electrical energy equivalent to a power consumption of 1,000 watts for one hour. The kWh is commonly used as a billing unit for energy delivered to consumers by electric utilities.

According to the CEC's 2022 Total System Electric Generation summary (see: https://www.energy.ca.gov/data-reports/energy-almanac/california-electricity-data/2022-total-system-electric-generation) regarding statewide energy demand, total electric energy production in California was 287,22013 gigawatt hours in 2023. A gigawatt is equal to one million kW

Electricity

According to the U.S. Energy Information Administration (see: https://www.eia.gov/state/print.php?sid=CA), in 2023, California was the nation's fourth-largest electricity producer and accounted for about 5% of all U.S. utility-scale (1-megawatt and larger) power generation. Renewable resources, including hydropower and small-scale (less than 1-megawatt) customer-sited solar photovoltaic (PV) systems, supplied 54% of California's total in-state electricity generation in 2023. Natural gas-fired power plants provided 39% of the state's total net generation. Nuclear power's share of California's total electricity generation was about 7%. The state has one operating commercial nuclear power plant—the two-reactor Diablo Canyon facility.

In 2023, California was the nation's second-largest conventional hydroelectric power producer after Washington, and it is consistently among the nation's top four hydropower producers.

Hydropower's contribution is highly variable and is dependent on rain and snowfall. After a very wet year in California in 2023, led in part by the highest mountain snowpack since the mid-1980s, the state's annual hydropower generation increased by more than 80% from 2022. Nonhydroelectric renewable resources, mainly solar and wind energy, provided 41% of California's total in-state electricity generation in 2023. Coal fuels only a small amount of California's in-state net generation, all of it from one 57-megawatt industrial cogeneration plant.

Although California consumes more electricity than all other states except Texas and Florida, it uses less electricity per capita than any other state but Hawaii. In 2023, California had the nation's second-highest average price of electricity, after Hawaii. The commercial sector accounted for 47% of California's electricity sales in 2023. The residential sector, where three in ten California households use electricity for home heating, accounted for 35% of sales. About 18% of the state's electricity sales went to the industrial sector. Light rail, subways, and the iconic cable cars in California's transportation sector accounted for less than 0.3% of electricity use.

California used approximately 287,220 gigawatt hours of electricity in 2022 (see: https://www.energy.ca.gov/data-reports/energy-almanac/california-electricity-data/2022-total-system-electric-generation). Electricity usage in California for different land uses varies substantially by the types of uses in a building, type of construction materials used in a building, and the efficiency of all electricity-consuming devices within a building. Due to the state's energy efficiency building standards and efficiency and conservation programs, California's electricity use per capita in the residential sector is lower than any other state except Hawaii.

Electricity and Natural Gas Usage

Does not apply to the Project as it would not require the use of electricity or natural gas.

Existing Transportation Fuels

Fuel usage associated with vehicle miles traveled (VMT). VMT is based on vehicle trips beginning and ending in certain geographic areas, (e.g. a municipality's boundaries and from external/internal trips that either begin or end in a municipality). As the nature of the Project can be summarized as enhancement of pedestrian and cycling to encourage and facilitate pedestrian and bicycling mobility while also providing components to ensure pedestrian/cycling safety, VMT would not apply to the Project.

Regulatory Setting

Federal

Federal Energy Policy and Conservation Act

The Energy Policy and Conservation Act of 1975 was established in response to the 1973 oil crisis. The act created the Strategic Petroleum Reserve, established vehicle fuel economy standards, and prohibited the export of U.S. crude oil (with a few limited exceptions). It also created Corporate Average Fuel Economy (CAFE) standards for passenger cars starting in model year 1978. The CAFE standards are updated periodically to account for changes in vehicle technologies, driver behavior, and/or driving conditions. The nature of the Project can be summarized as enhancement of pedestrian and cycling to encourage and facilitate pedestrian and bicycling mobility while also providing components to ensure pedestrian/cycling safety. As such, the *Federal Energy Policy and Conservation Act* would not apply to the Project.

State

Warren–Alquist Act

The California Legislature passed the Warren–Alquist Act in 1974, which created the CEC. The legislation also incorporated the following three key provisions designed to address the demand side of the energy equation:

- It directed the CEC to formulate and adopt the nation's first energy conservation standards for buildings constructed and appliances sold in California.
- The act removed the responsibility of electricity demand forecasting from the utilities, which had a financial interest in high demand projections, and transferred it to a more impartial CEC.
- The CEC was directed to embark on an ambitious research and development program, with a particular focus on fostering what were characterized as non-conventional energy sources.

The nature of the Project can be summarized as enhancement of pedestrian and cycling to encourage and facilitate pedestrian and bicycling mobility while also providing components to ensure pedestrian/cycling safety. As such, the Project would not result in greater energy demand.

California Public Utilities Commission

In September 2008, the California Public Utilities Commission (CPUC) adopted the Long-Term Energy Efficiency Strategic Plan, which provides a framework for energy efficiency in California through the year 2020 and beyond. It articulates a long-term vision, as well as goals for each economic sector, identifying specific near-term, mid-term, and long-term strategies to assist in achieving these goals. As noted earlier, the nature of the Project can be summarized as enhancement of pedestrian and cycling to encourage and facilitate pedestrian and bicycling mobility while also providing components to ensure pedestrian/cycling safety. As such, *the Long-Term Energy Efficiency Strategic Plan* would not apply to the Project.

State of California Energy Action Plan

The CEC and CPUC approved the first State of California Energy Action Plan in 2003. The plan established shared goals and specific actions to ensure the provision of adequate, reliable, and reasonably priced electrical power and natural gas supplies; it also identified cost-effective and environmentally sound energy policies, strategies, and actions for California's consumers and taxpayers. As noted earlier, the nature of the Project can be summarized as enhancement of pedestrian and cycling to encourage and facilitate pedestrian and bicycling mobility while also providing components to ensure pedestrian/cycling safety. As such, the *State of California Energy Action Plan* would not apply to the Project.

Assembly Bill 32 (2006) and Senate Bill 32 (2016)

In 2006, the State Legislature enacted AB 32, the California Global Warming Solutions Act of 2006. AB 32 requires California to reduce its GHG emissions to 1990 levels by 2020. In 2016, the Legislature enacted Senate Bill (SB) 32, which extended the horizon year of the state's codified GHG reduction planning targets from 2020 to 2030, requiring California to reduce its GHG emissions to 40% below 1990 levels by 2030. As noted earlier, the nature of the Project can be summarized as enhancement of pedestrian and cycling to encourage and facilitate pedestrian and bicycling mobility while also providing components to ensure pedestrian/cycling safety; as such, *AB 32 and SB 32* would not apply to the Project.

Title 24, Part 6, Energy Efficiency Standards

Energy conservation standards for new residential and nonresidential buildings were adopted by the California Energy Resources Conservation and Development Commission (now the CEC) in June 1977 and most recently revised in 2022 (California Code of Regulations Title 24, Part 6); no changes have occurred beyond the 2019 edition of Part 6. Title 24 requires the design of building shells and building components to conserve energy. The standards are updated periodically to allow for consideration and possible incorporation of new energy-efficiency technologies and methods. As noted earlier, the nature of the Project can be summarized as enhancement of pedestrian and cycling to encourage and facilitate pedestrian and bicycling mobility while also providing components to ensure pedestrian/cycling safety. As such, *Title 24, Part 6, Energy Efficiency Standards* would not apply to the Project.

Title 24, Part 11, Green Building Standards

On July 17, 2008, the California Building Standards Commission adopted the nation's first green building standards. The California Green Building Standards Code (Title 24 of the California Code of Regulations, Part 11, known as "CALGreen") was adopted as part of the California Building Standards Code. It includes mandatory requirements for new residential and nonresidential buildings throughout California. CALGreen is intended to (1) reduce GHG

emissions from buildings; (2) promote environmentally responsible, cost-effective, healthier places to live and work; (3) reduce energy and water consumption; and (4) respond to the directives by the Governor. The mandatory provisions of the most recent version CALGreen became effective January 1, 2023. As noted earlier, the nature of the Project can be summarized as enhancement of pedestrian and cycling to encourage and facilitate pedestrian and bicycling mobility while also providing components to ensure pedestrian/cycling safety. As such *Title 24, Part 11, Green Building Standards* would not apply to the Project.

Regional

Tulare County Association of Governments (TCAG)

As summarized in the Executive Summary of TCAG'S 2022 Regional Transportation Plan and Sustainable Communities Strategy, "The Tulare County Association of Governments is pleased to present its Draft 2022 Regional Transportation Plan/Sustainable Communities Strategy (2022 RTP/SCS). The Regional Transportation Plan (RTP) is a long-range planning document that defines how the region plans to invest in the transportation system over 20+ years based on regional goals, multi-modal transportation needs for people and goods, and estimates of available funding.

The Sustainable Communities Strategy (SCS) is a component of the RTP, required by SB 375, that sets forth a forecasted development pattern for the region, which, when integrated with the transportation network and other transportation measures and policies, will reduce greenhouse gas (GHG) emissions from passenger vehicles and light trucks to achieve the GHG reduction targets set by the California Air Resources Board. The future land use and transportation scenario presented in the SCS must accommodate forecast population, employment, and housing sufficient to meet the needs of all economic segment of population, including the State-mandated Regional Housing Needs Assessment (RHNA), while considering State housing goals." The RTP/SCS can be found in its entirety at: https://tularecog.org/tcag/planning/rtp/rtp-20181/

Local

The Project would occur in areas lacking pedestrian facilities or needing enhanced pedestrian-oriented facilities, thus contributing to reduced energy use from the transportation sector. The pedestrian enhancements would provide a safer environment that would encourage Tribal citizens to forego vehicle travel and alternatively cycle and walk which would also contribute to minimizing VMT.

Thresholds and Methodology

The impact analysis provided in this section is based on the application of the following California Environmental Quality Act (CEQA) Guidelines Appendix G, which indicates that a Project would have a significant impact on energy use if it would:

1. *Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation?*

2. *Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?*

The methodology applied to assess the Project's potential impacts involved the use of the California Emissions Estimator Model (CalEEMod) Version 2022.1.1 (CAPCOA 2022) that can be found in Appendix A For the construction phase, energy use would be attributed to worker trips and operation of construction equipment. Diesel and gasoline would be utilized to fuel on and off-road construction equipment during this phase of the Project. Energy use associated with the operational phase would result from residential vehicle trips (mobile sources) and activities in homes that consume energy in the form of electricity. No natural gas will be utilized. Although electricity generation produces criteria pollutants and GHGs, these are emitted offsite at fossil fuel power plants and these pollutants are not attributed to pedestrian-related facilities. The power plants responsible for electricity generation are existing stationary sources permitted by air districts and/or the USEPA, criteria pollutant emissions are generally associated with the power plants themselves. These criteria pollutant emissions are subject to local, state and federal control measures. (CAPCOA 2022)

Unlike criteria pollutants, GHG emissions at these offsite power plants are not subject to the same stationary source permitting requirements and it is difficult to mitigate GHG emissions associated with them. Therefore, the most effective way to control GHGs from power plants is to reduce electricity demand by electricity users, which can be mitigated through building efficiency measures. As a result, the CalEEMod program calculates GHG emissions (not criteria pollutant emissions) from regional power plants associated with building electricity use. To reduce GHG emissions and energy usage, the Project would comply with the provisions of Part 6 of the Title 24 California Code of Regulations, which is the Building Energy Efficiency Standards (Energy Code). The California Energy Commission implements Title 24, Part 6 to increase the energy efficiency of newly constructed residential buildings. The latest Energy Code is for 2023, which was the 2022 Energy Code (CAPCOA 2022).

CalEEMod defaults were used for vehicle trips lengths, vehicle trip counts, and electricity consumption. Natural gas emission factors were set to zero to account for the absence of direct natural gas consumption on the Project site. In order to calculate energy consumption from mobile sources in MBTUs, 2023 gasoline/diesel miles per gallon (MPG) factors provided by the EMFAC2017 Emissions Inventory were used. To simplify the estimation process for the construction phase, it was assumed that all worker vehicles used gasoline as fuel source and all vendor vehicles used diesel as a fuel source. Project-specific construction equipment was entered using data modeled from previous, completed construction projects. Energy

Calculations for both construction and operational phases are provided in the HRA Report included in Appendix A.

Discussion

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

Less Than Significant Impact: As noted earlier, the nature of the Project is pedestrian safety enhancements and new pedestrian bridges. As such, the Project would not result in a significant impact due to wasteful, inefficient, or unnecessary consumption of the energy resource during Project construction or operation. Fueled use to operate construction-related equipment and employees driving to the Project site would be short-term, temporary, and intermittent and will cease after construction-related activities are concluded. Further, the overall objective of this type of project is to enhance, encourage, and facilitate pedestrian and bicycling mobility while also providing components to ensure pedestrian/cycling safety. Vehicle fuel consumption during Project construction-related activities was estimated based on the assumed construction schedule, vehicle trip lengths, and the number of workers per construction phase as provided by CalEEMod Version 2022.1.1, and Year 2024 gasoline/diesel MPG factors provided by EMFAC2017. Energy calculations are provided in Appendix A of the HRA Report. It is noted that the Project would not generate additional daily vehicle usage above the current usage as it is intended to provide pedestrian and cycling mobility rather than vehicle usage. As such, the results contained in the Appendix A of HRA Report at Tables 2.4, 4.2, and 5.11 show negligible-to-no gasoline, diesel, electricity or natural gas usage. Further, the usage of the respective energy sources would be short-term, temporary, and intermittent do construction-related activities and would completely end upon the cease construction-related activities.

While construction-related activities of the Project would result in additional energy consumption, this energy use is not unnecessary or inefficient. This energy use is justified as the overall goal is to provide a safe environment to encourage walking and cycling thereby reducing vehicle usage and gasoline consumption by vehicles.

Because construction-related energy use would be temporary, short-term, and intermittent, and limited to the greatest extent feasible through consistency with Federal, State, and local policies related to energy conservation, and operation of the Project would comply with applicable energy efficiency standards required under Title 24, Part 6. Based on the analysis and information contained herein, and in the HRA report (see Appendix A) prepared by qualified consultants Core Environmental Consulting, the Project would not result in inefficient, unnecessary, or wasteful energy use. As such, the impact would be *less than significant.*

Mitigation Measures: None Required

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

No Impact: The proposed Project would not conflict with or obstruct any state or local plans for renewable energy or energy efficiency. The construction and operation of the Project would comply with applicable energy efficiency regulations. Also, as noted earlier, the nature of the Project is pedestrian safety enhancements and new pedestrian bridges which would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency at or near the proposed Project location. The primary activity that would consume energy would be construction-related activities; however, these activities would be short-term, temporary, and intermittent and will cease after construction-related activities are concluded. To reiterate, the overall objective of this type of project is to enhance, encourage, and facilitate pedestrian and bicycling mobility while also providing components to ensure pedestrian/cycling safety. Therefore, based on the analysis and information contained herein, and in the HRA report (see Appendix A) prepared by qualified consultants Core Environmental Consulting, *no impact* would occur.

Mitigation Measures: None Required

Mitigation Measures: None Required

Based on the analysis and information contained herein, no mitigation measures would be required.

Cumulative Impact: Less Than Significant

Cumulative impacts would be limited to the Tule River Reservation area. Cumulative could occur if a series of actions lead to a wasteful, inefficient, or unnecessary consumption of energy resources or a conflict with or obstruction of a State or local plan for renewable energy and energy efficiency. As noted earlier, the proposed Project is located within the service area of SCE. However, due to the nature of the project (a pedestrian/cycling oriented project with safety components), The Project would not result in a long-term increase in operational energy demand for electricity or natural gas. In addition, construction-related activities would require the use of energy for purposes such as the operation of construction equipment and tools, and construction of development projects may overlap. However, construction-related emissions would be short-term, temporary, and intermittent and would cease once construction-related operations are complete.

Although the nature of GHG is a global and national issue, the practical geographic area is the state of California and the San Joaquin Valley Air Basin (including all of Tulare County). GHG emission reduction efforts are required via state legislation (e.g., SB 375 The Sustainable Communities and Climate Protection Act (SB 375). As noted earlier, based on the Project's location and its primary objective of pedestrian/cycling enhancements with enhanced safety

features, the Project would result in minimizing GHG emissions consistent with the overall objective of an Active Transportation Plan (ATP) project to encourage alternatives (such as walking and cycling) rather than relying on vehicle usage. Therefore, based on the analysis and information provided herein, the Project would result in a *less than significant impact*.

VII. GEOLOGY AND SOILS

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

Environmental Setting

Geology

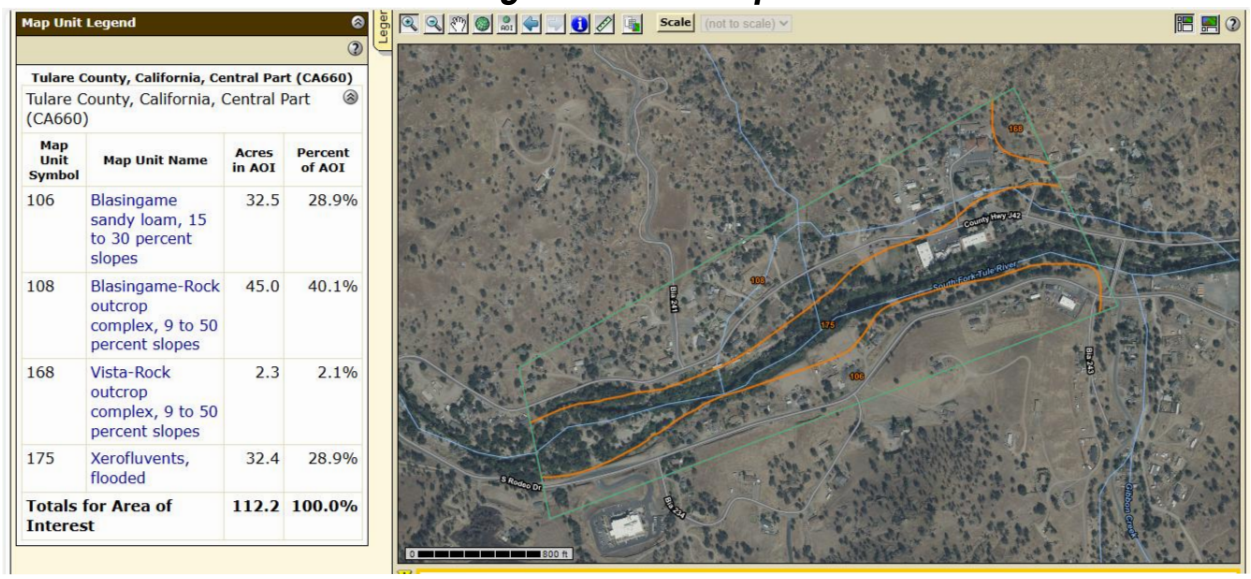
The Tule River Reservation is not located in the San Joaquin Valley. This is important as the San Joaquin Valley is in the southern half of the Great Valley Geomorphic Province. The Great Valley Geomorphic Province is a long, narrow northwest-trending alluvial valley that lies between the Sierra Nevada to the east and the Coast Ranges to the west. However, as the Project is generally located within the 1,000 feet elevation of the foothill region, it does not have the underlain sediments from alluvial deposits, as well as non-marine sedimentary rocks typically found in the San Joaquin Valley. The Project site is predominantly granitic rock (pre-Cenozoic) with scattered metamorphic rock (pre-Cenozoic).

Soils

The predominant soil types in Project area include Xerofluvents flooded, generally along the Tule River's course, Blassingame sandy loam to the south and Blasingame-Rock to the north.

The soil types share similarities and/or are within similar ranges such as: hills, not prime farmland, 36 to 60 inches to bedrock, slopes of 0 to 50 percent, depth to restrictive feature (where properties that significantly reduce the movement of water and air through the soil), 20 to 40 inches to paralithic bedrock (where excavations can be made with trenching machines, backhoes, or small rippers), runoff class is high, with the frequency of flooding ranging from occasional (within the River's banks) to none, and no frequency to ponding (see: USDA at FOTG Section II. Natural Resources Information A. Soils Information https://efotg.sc.egov.usda.gov/references/Delete/2008-8-16/Soil_Feat_Def.pdf.)

Figure 3-1 Soils Map



Earthquake Hazards

"Ground-shaking is the primary seismic hazard in Tulare County because of the county's seismic setting and its record of historical activity. Thus, emphasis focuses on the analysis of expected levels of ground-shaking, which is directly related to the magnitude of a quake and the distance from a quake's epicenter. Magnitude is a measure of the amount of energy released in an earthquake, with higher magnitudes causing increased ground-shaking over longer periods of time, thereby affecting a larger area. Ground-shaking intensity, which is often a more useful measure of earthquake effects than magnitude, is a qualitative measure of the effects felt by population. The valley portion of Tulare County is located on alluvial deposits, which tend to experience greater ground-shaking intensities than areas located on hard rock. Therefore, structures located in the valley will tend to suffer greater damage from ground-shaking than those located in the foothill and mountain areas. However, existing alluvium valleys and weathered or decomposed zones are scattered throughout the mountainous portions of the county which could also experience stronger intensities than the surrounding solid rock areas. The geologic characteristics of an area can therefore be a greater hazard than its distance to the epicenter of the quake. (see Tulare County General Plan 2030 Update, Background Report, Page 8-5). The Earth's crust includes tectonic plates that locally collide with or slide past one another along plate boundaries. California is particularly susceptible to such plate movements, notably the largely horizontal or "strike-slip" movements of the Pacific Plate, as it impinges on the North American Plate. In general, earthquakes occur when the accumulated stress along a plate boundary or fault is suddenly released, resulting in seismic slippage. This slippage can vary widely in magnitude, ranging in scale from a few millimeters or centimeters to tens of feet.

"There are three faults within the region that have been, and will be, principal sources of potential seismic activity within Tulare County. These faults are described below:

- San Andreas Fault. The San Andreas Fault is located approximately 40 miles west of the Tulare County boundary. This fault has a long history of activity, and is thus the primary focus in determining seismic activity within the county. Seismic activity along the fault varies along its span from the Gulf of California to Cape Mendocino. Just west to Tulare County lies the "Central California Active Area," where many earthquakes have originated.
- Owens Valley Fault Group. The Owens Valley Fault Group is a complex system containing both active and potentially active faults, located on the eastern base of the Sierra Nevada Mountains. The Group is located within Tulare and Inyo Counties and has historically been the source of seismic activity within Tulare County.
- Clovis Fault. The Clovis Fault is considered to be active within the Quaternary Period (within the past two million years), although there is no historic evidence of its activity, and is therefore classified as "potentially

> active." This fault lies approximately six miles south of the Madera County boundary in Fresno County. Activity along this fault could potentially generate more seismic activity in Tulare County than the San Andreas or Owens Valley fault systems. In particular, a strong earthquake on the Fault could affect northern Tulare County. However, because of the lack of historic activity along the Clovis Fault, inadequate evidence exists for assessing maximum earthquake impacts." (see Tulare County General Plan 2030 Update Background Report, pages 8-6 and 8-7 at: https://generalplan.co.tulare.ca.us/documents/GeneralPlan2010/Appendix%20B%20-%20Background%20Report.pdf).

"Older buildings constructed before current building codes were in effect, and even newer buildings constructed before earthquake resistance provisions were included in the current building codes, are most likely to suffer damage in an earthquake. Most of Tulare County's buildings are no more than one or two stories in height and are of wood frame construction, which is considered the most structurally resistant to earthquake damage. Older masonry buildings (without earthquake-resistance reinforcement) are the most susceptible to structural failure, which causes the greatest loss of life. The State of California has identified unreinforced masonry buildings as a safety issue during earthquakes. In high-risk areas (Bay Area) inventories and programs to mitigate this issue are required. Because Tulare County [geographic area] is not a high-risk area, state law only recommends that programs to retrofit URMs are adopted by jurisdictions." (see Tulare County General Plan 2030 Update Background Report, page 8-8 at: https://generalplan.co.tulare.ca.us/documents/GeneralPlan2010/Appendix%20B%20-%20Background%20Report.pdf).

As shown in the California Department of Conservation, CA Geological Survey, the Project site is not located within an earthquake fault zone. (See: https://maps.conservation.ca.gov/cgs/informationwarehouse/eqzapp/#data_s=id%3AdataSource_4-191d8e6d993-layer-25%3A5083120)

Landslides

Landslides are gravity-driven movements of earth materials that can include rock, soil, unconsolidated sediment, or combinations of such materials. The rate of landslide movement can vary; some move rapidly, as in a soil or rock avalanche, while other landslides creep or move slowly for long periods of time. The susceptibility of a given area to landslides depends on many variables, although the general characteristics that influence landslide hazards are widely acknowledged. Some important factors are:

- **Slope Material.** Loose, unconsolidated soils and soft, weak rocks are more hazardous than are firm, consolidated soils or hard bedrock.
- **Slope Steepness.** Most landslides occur on moderate to steep slopes.
- **Structure and Physical Properties of Materials.** This includes the orientation of layering and zones of weakness relative to slope direction.
- **Water Content.** Increased water content increases landslide hazard by decreasing friction and adding weight to the materials on a slope.
- **Vegetation Coverage.** Abundant vegetation with deep roots promotes slope stability.
- **Proximity to Areas of Erosion or Human-made Cuts.** Undercutting slopes can greatly increase landslide potential.
- **Earthquake Ground Motions.** Strong seismic ground motions can trigger landslides in marginally stable slopes or loosen slope materials, and also increase the risk of future landslides.

The Project site does not contain areas susceptible to landslides.

Regulatory Setting

Federal

Paleontological Resources Preservation Act

The federal Paleontological Resources Preservation Act of 2002 limits the collection of vertebrate fossils and other rare and scientifically significant fossils to qualified researchers who have obtained a permit from the appropriate state or federal agency. Additionally, it specifies these researchers must agree to donate any materials recovered to recognized public institutions, where they will remain accessible to the public and to other researchers. This act incorporates key findings of a report, Fossils on Federal Land and Indian Lands, issued by the Secretary of Interior in 2000, which establishes that most vertebrate fossils and some invertebrate and plant fossils are considered rare resources.

State

Alquist-Priolo Earthquake Fault Zoning Act

The Alquist-Priolo Earthquake Fault Zoning Act was passed in 1972 to mitigate the hazard of surface fault rupture to structures used for human occupancy.2 The main purpose of this act is to prevent the construction of buildings used for human occupancy on top of active faults. This act only addresses the hazard of surface fault rupture and is not directed toward other earthquake hazards, such as earthquake induced liquefaction or landslides.3 This act requires the State Geologist to establish regulatory zones (known as Earthquake Fault Zones or Alquist-

Priolo Zones) around surface traces of active faults, and to issue appropriate maps.4 The maps, which are developed using existing United States Geological Survey's (USGS) 7.5-minute quadrangle map bases, are then distributed to all affected cities, counties, and state agencies for their use in planning and controlling new or renewed construction. Generally, construction within 50 feet of an active fault zone is prohibited.

Seismic Hazards Mapping Act

The Seismic Hazards Mapping Act, which was passed in 1990, addresses seismic hazards such as liquefaction and seismically induced landslides. Under this act, seismic hazard zones are mapped by the State Geologist to assist local governments in land use planning. Section 2691(c) of this act states that "it is necessary to identify and map seismic hazard zones in order for cities and counties to adequately prepare the safety element of their general plans and to encourage land use management policies and regulations to reduce and mitigate those hazards to protect public health and safety." Section 2697(a) of the act states that "cities and counties shall require, prior to the approval of a project located in a seismic hazard zone, a geotechnical report defining and delineating any seismic hazard.

California Building Code

The State of California provides a minimum standard for building design through Title 24 of the California Code of Regulations (CCR), commonly referred to as the California Building Code (CBC). The CBC is in Part 2 of Title 24. The CBC is updated every three years (it is currently being updated for Year 2026). It is generally adopted on a jurisdiction-by-jurisdiction basis, subject to further modification based on local conditions. They also regulate grading activities, including drainage and erosion control. The CBC contains general building design and construction requirements relating to fire and life safety, structural safety, and access compliance. CBC provisions provide minimum standards to safeguard life or limb, health, property, and public welfare by regulating and controlling the design, construction, quality of materials, use and occupancy, location and maintenance of all buildings and structures and certain equipment. Through the CBC, the State provides a minimum standard to protect property and public safety by regulating the design and construction of excavations, foundations, building frames, retaining walls, and other building elements to mitigate the effects of seismic shaking and adverse soil conditions. They also regulate grading activities, including drainage and erosion control.

California Environmental Quality Act (CEQA)

Paleontological resources are afforded protection under the CEQA. The Society of Vertebrate Paleontology has set significance criteria for paleontological resources. Most practicing professional vertebrate paleontologists adhere closely to the Society of Vertebrate Paleontology's assessment, mitigation, and monitoring requirements as specifically provided in its standard guidelines. Most State regulatory agencies with paleontological laws,

ordinances, regulations, and standards accept and use the professional standards set forth by the Society of Vertebrate Paleontology.

California Public Resources Code (PRC) Section 5097

PRC Section 5097.5 prohibits the destruction or removal of any paleontological site or feature from public lands without the permission of the jurisdictional agency.

California Penal Code Section 622.5

The California Penal Code Section 622.5 details the penalties for damage or removal of paleontological resources, whether from private or public lands.

Regional

Tulare County Multi-Jurisdictional Hazard Mitigation Plan (MJHMP)

The Tulare County Office of Emergency Services prepared the MJHMP together with several jurisdictions in Tulare County, including the Tule River Tribe. The MJHMP was prepared in accordance with the Disaster Mitigation Act of 2000 and followed the Federal Emergency Management Agency (FEMA) 2011 Local Hazard Mitigation Plan guidance. The most recent MJHMP, adopted in 2023, includes hazard mitigation goals, strategies, and priorities, and provides a comprehensive assessment of the area's hazards and vulnerabilities. The MJHMP is a guide to hazard mitigation throughout Tulare County and serves as a tool to help decision makers direct hazard mitigation activities and resources. In the context of the MJHMP, mitigation is an action that reduces or eliminates long-term risk to people and property from hazards, including those occurring naturally, such as earthquakes, and those caused by humans as well.

Local Regulations

None that apply to the Project.

Discussion

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

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

No Impact: The proposed Project does not include any new permanent structures intended for human occupancy. No substantial faults are known to traverse Tulare County according to the Alquist-Priolo Earthquake Fault Zoning Maps and the California Department of Conservation. The proposed Project site is located on solid rock formation and is not at risk from subsidence, liquefaction, or sliding. Also, as noted earlier, the CA Geological Survey indicates that the Project site is not located within an earthquake fault zone. As such, the Project site would not experience surface rupture in the event of an earthquake. Therefore, based on the analysis and information provided herein, there would be *no impact*.

ii.Strong seismic ground shaking?

Less Than Significant Impact: The proposed Project comprises of bedrock. Ground shaking is responsible for most of the damage from earthquakes and can damage or destroy buildings, structures, pipelines, and infrastructure. The intensity of shaking depends on the type of fault, distance to the epicenter, magnitude of the earthquake, and subsurface geology. The Clovis Fault, Owens Valley Fault Group, and San Andreas Fault are potentially capable of producing the most intense ground accelerations. All new components of the Project would be constructed pursuant to the proposed project would be designed to meet current design standards in the latest CBC. Project design features would reduce the exposure of people and structures to harm from strong ground-shaking hazards such that there would not be a significant impact. Therefore, based on the analysis and information provided herein, the impact would be *less than significant.*

iii.Seismic-related ground failure, including liquefaction?

No Impact:. Secondary effects of earthquakes are nontectonic processes such as ground deformation, including fissures, settlement, displacement, and loss of bearing strength, and are the leading causes of damage to structures during a moderate to large earthquake. Secondary effects could lead to ground deformation, including liquefaction, lateral spreading, seismically induced landslides, and ground lurching. The Project would be entirely located on bedrock that would not be conducive to ground failure, including liquefaction. Therefore, based on the analysis and information provided herein, there would be *no impact.*

iv.Landslides?

No Impact: The proposed Project Site is located on bedrock and although near hills to the east, the slopes of the hills in the area are short in length and have minimal slopes resulting in no potential for landslides. No geologic landforms exist on or near the Project Site, as such, it is unlikely that a landslide event would occur. Therefore, based on the analysis and information provided herein, *no impact* would occur.

Mitigation Measures: None Required

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

No Impact: As noted earlier, the Project site is located on bedrock with shallow surface soils, the potential for erosion is low. However, construction-related activities and increased impermeable surfaces can increase the probability for erosion to occur. Construction-related impacts related to erosion would be temporary, short-term, and intermittent.

The CBC provides regulations for construction to provide proper grading, drainage, and erosion and sediment control. Erosion-control measures can include seeding slopes, installation of temporary dikes and swales, placement of straw bales and filter fences, outlet protection, grass-lined swales, and installation of sediment retention structures, as appropriate for specific sites. In addition,

Adherence to existing regulatory requirements such as the CBC grading and drainage requirements, would ensure that impacts associated with substantial erosion and loss of topsoil in the Project site would be avoided or minimized. The Project site would be required to implement best management practices (BMPs) as specified by a Stormwater Pollution Prevention Plan (SWPPP), which are developed to prevent significant impacts related to erosion from construction-related activities. Impacts related to erosion would be limited to construction-related activities and would be temporary, short-term, and intermittent. As such, based on the analysis and information provided herein, there would be *no impact.*

Mitigation Measures: None Required

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

No Impact: As addressed in response to earlier Items a) and b), the Project site is not situated in an area susceptible to landslides, liquefaction, or other geological hazards. Lateral spreading, induced by liquefaction, occurs when seismic ground shaking causes slopes with saturated soils to liquefy and flow toward the open slope face. However, the Project site lacks significant slopes, which would minimize if not entirely neutralize this concern. Ground subsidence generally occurs when overdrafts from a groundwater basin diminish the upward hydraulic pressure that supports the land surface above, leading to the consolidation or settlement of the underlying soils. Additionally, geological hazards would be accounted for through the implementation of seismic standards outlined by the California Building Code. Therefore, based on the analysis and information contained herein, there would be *no impact*.

Mitigation Measures: None Required

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

No Impact: As noted earlier, the Project site is generally located on shallow soil (with an approximate depth of 36") lain over bedrock. Prior to initiation of construction-related activities of the Project site, potential geological or seismic hazards would be identified early in the process and soil characteristics would be evaluated that would determine if the soils are expansive. Typically, proposed development on expansive soils follows regulations imposed by the CBC, such as standards for seismic safety, excavation, foundations, retaining walls, site demolition, and grading activities, including drainage and erosion control. Specific engineering methods that could be used to reduce the impact of expansive soils include drainage-control devices to limit water infiltration near foundations, over-excavation and re-compaction of engineered fill method, or support of the foundation with piles. Compliance with state, regional, and local regulations pertaining to structural safety regarding a geologic unit or soils that are unstable and could result in landslides, lateral spreading, subsidence, liquefaction, or collapse, and would ensure that results from implementation of the proposed project would not directly or indirectly cause substantial adverse effects, including the risks to life or property. As noted earlier, as the Project Site is generally located on shallow soil lain over bedrock, it is not in an area with expansive soils. Because the soils associated with the Project do not exhibit shrink-swell behavior, implementation of the Project would not pose a risk to life or property caused by expansive soils. Therefore, based on the analysis and information provided herein, there would be *no impact.*

Mitigation Measures: None Required

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

No Impact: The proposed Project would not use septic tanks or alternative wastewater disposal systems. Therefore, based on the analysis and information provided herein, *no impact* would occur.

Mitigation Measures: None Required

f) Would the Project directly or indirectly destroy a unique paleontological resource or Site or unique geologic feature?

Less Than Significant Impact with Mitigation Incorporated: "Paleontological resources (i.e., fossils) are considered nonrenewable scientific resources because once destroyed, they cannot be replaced. As such, paleontological resources are afforded protection under the state and local laws and regulations briefly discussed in this chapter. Federal laws and

regulations only apply when projects are located on federal lands or federally managed lands, or when they are federally funded." (South County Detention Facility Draft Environmental Impact Report. Appendix "Historic Resource Report 1545 & 1591 South Newcomb Street, Porterville, CA" February 2013. Page 2 of Appendix C, "Paleontological Resources Assessment Report for the South County Detention Facility Project, Porterville, Tulare County, California" Appendix C. Prepared by Applied EarthWorks, Inc. February 2013. Page 2. Certified and adopted by the Tulare County Board of Supervisors June 25, 2013. Resolution No. 2013-0390).

"Paleontological resources comprise fossils – the remains or traces of once-living organisms preserved in sedimentary deposits – together with the geologic context in which they occur. Sedimentary deposits include unconsolidated or semi-consolidated "soils" or sedimentary rocks. Most fossil remains are the preserved hard parts of plants or animals, and include bones and/or teeth of once-living vertebrate animals, shells or body impressions of invertebrate animals, and impressions or carbonized or mineralized parts of plants (e.g. "petrified wood"). Trace fossils include preserved footprints, trackways, and burrows of prehistoric animals and root marks created by plants. Fossils are scientifically important as they provide the only available direct evidence of the anatomy, geographic distribution, and paleoecology of organisms of the past. Scientific studies based on fossils and comparisons between them continue to refine details of the basic history of life. In conjunction with physical geologic investigations, the use of fossils as indicators of geologic time and ancient environments also contributes to understanding of the physical history of the earth, the distribution of mineral resources, dynamics of earth processes, and past climatic changes." (Sequoia Gateway Commerce and Business Park Specific Plan DEIR SCH No. 2015081056, page. 3.5-3. Prepared by Bert Verrips Environmental Consulting. September 2018, accessed at: https://tularecounty.ca.gov/rma/projects/planning-projects/applicant-projects/sequoia-gateway-commerce-park/); Certified and adopted by the Tulare County Board of Supervisors December 4, 2018. Resolution No. 2018-0938.)

Potential for fossils to occur within Project Area can be based on geologic indicators. Quaternary period deposits consist of alluvial material that can be conducive to preserving once-living organisms in sedimentary deposits wherein, over time, the once-living organisms became fossilized. The Project area lies within metamorphic rock (Pre-Cenozoic period) and is east of Quaternary period deposits. (see GeoScienceWorld Research Article April 1, 2013; page 193 by John Wakabayashi which can be accessed at: https://pubs.geoscienceworld.org/gsa/geosphere/article/9/2/191/132574/paleochannels-stream-incision-erosion-topographic). "The Quaternary period includes the older Pleistocene Epoch (about 2.6 million to 10,000 years ago) and the Holocene (Recent) Epoch, which includes approximately the last 10,000 years. The Pleistocene Epoch is informally termed the Ice Age, and this is the depositional period which yields vertebrate fossils, and therefore deposits from this period are considered highly sensitive for paleontological resources. The Holocene deposits, which comprise more recent layers that were deposited on top of the Pleistocene material, yield few if any vertebrate fossils, and thus are considered

to have a low sensitivity for paleontological resources. However, since Holocene strata have some potential to preserve fossil materials, there is always a possibility of fossil discoveries in these younger materials. In the eastern San Joaquin Valley, the thickness of the Holocene deposits overlying the Pleistocene deposits generally increases with distance westward from the lower foothills of the Sierra." (Sequoia Gateway Commerce and Business Park Specific Plan DEIR (SCH No. 2015081056). page. 3.5-4. Prepared by Bert Verrips Environmental Consulting. September 2018. Certified and adopted by the Tulare County Board of Supervisors December 4, 2018. Resolution No. 2018-0938)

No paleontological resources or sites, or unique geologic features have previously been encountered on the proposed Project site. As noted earlier, a cultural resources records search was conducted of the site. No archaeological deposits or isolated finds were identified during that search. Although it cannot conclusively be demonstrated that no subsurface paleontological resources are present, it is possible to mitigate potentially significant impacts with Mitigation Measure GEO-1. With the implementation the Mitigation Measure GEO-1 Project-specific impacts related to this Checklist Item will be reduced to a Less Than Significant Impact with Mitigation. Regardless of type, development would be required to comply with the federal Paleontological Resources Preservation Act that limits the collection of vertebrate fossils and other rare and scientifically significant fossils to qualified researchers who have obtained a permit from the appropriate state or federal agency and the California Public Resources Code Section 5097 that prohibits the removal of any paleontological site or feature from public lands without the permission of the jurisdictional agency. Ground-disturbing construction-related activities (e.g., grading and excavation) associated with the Project site could uncover fossilized remains of organisms from prehistoric environments that have not been recorded. The implementation protocols and adherence to the Society of Vertebrate Paleontology standards would ensure the protection of unique paleontological resources during construction-related activities.

There are no unique geologic features or known paleontological resources located within the Project site. Compliance with state, regional, and local regulations pertaining to paleontological resources, would ensure that the Project would not directly or indirectly destroy a unique paleontological resource or unique geologic feature. However, Mitigation Measure GEO-1 is required in the event of inadvertent discovery of a paleontological resource to ensure potential impacts are not significant. Therefore, based on the analysis and information contained herein, impacts would be *less than significant with mitigation*.

Mitigation Measure: See GEO-1

Mitigation Measure GEO-1: If a suspected unique paleontological resource were to be discovered during construction of the Project, the following protocol shall be implemented:

- If a potentially significant paleontological resource is encountered during ground disturbing activities, all construction within a 100-foot radius of the find shall immediately

cease until a qualified paleontologist meeting the Society of Vertebrate Paleontology standards has evaluated the find in accordance with federal, state, and local guidelines. If it is determined to be a unique resource, such measures may include avoidance, preservation in place, data recovery and associated documentation, or other appropriate measures. Construction activity may continue unimpeded in other portions of the Project Site. whether the resources requires further study. The Project Manager shall include a standard inadvertent discovery clause in every construction contract to inform contractors of this requirement. The paleontologist shall notify the City of Porterville and/or a Tribal representative or other designee (e.g., the project manager) of the procedures that must be followed before construction-related activity is allowed to resume at the location of the find.

Cumulative Impact: Less than Significant

The geographic area of this cumulative analysis is Tulare County and the Tule River Reservation. Although it cannot conclusively be demonstrated that no subsurface paleontological resources are present, it is possible to mitigate potentially significant impacts with Mitigation Measure GEO-1. With implementation of Mitigation Measure GEO-1, Project-specific impacts related to this Checklist Item will be reduced to Less Than Significant levels. The Project site would not result in significant impacts related to geology and soils. Although the Project site includes some potentially significant hazards resulting from strong ground shaking, the Project would be subject to regulations pertaining to seismic safety as required by CBC requirements. Compliance with these requirements would, to the maximum extent practicable, reduce cumulative Project-related impacts that pertain to seismic shaking, seismic-related ground failure, seismically induced landslides, soil erosion, and unstable soils. Similarly, compliance with relevant requirements of the CBC, would minimize the cumulative impacts associated with substantial erosion or loss of topsoil. In the unlikely event that previously unknown resources are discovered during construction-related activities the find would be evaluated on its own merits. Cumulative development in adjacent jurisdictions would be subject to the same federal, state, and local regulations. Since impacts associated with geology and soils are by their nature focused on specific sites or areas, a less-than significant impact within the Project site to avoid impacts related to geology and soils from the proposed Project, would not contribute to a cumulative increase in hazards in the immediate Tulare County or the Tule River Reservation areas. Therefore, based on the analysis and information provided herein, cumulative impacts associated with geology and soils would *be less than significant*; with the exception of paleontological resources which would require mitigation as specified earlier.

VIII. GREENHOUSE GAS EMISSIONS

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

Qualified consultants Core Environmental Consulting, LLC., prepared the *"Technical Report Health Risk Assessment for Tule Active Transportation Plan Phase I"* (HRA Report) project which is used to provide technical expertise support regarding air quality, greenhouse gas, and health risk assessment items of this MND. The HRA Report is included in its entirety as Appendix A of this MND. Where necessary, and if available, additional site-specific facts, data, information, etc., are included in this discussion.

Environmental Setting

Climate Change is a change in the average weather of the earth that may be measured by alterations in wind patterns, storms, precipitation, and temperatures. These changes are assessed using historical records of temperature changes occurring in the past, such as during previous ice ages. Many of the concerns regarding climate change use this data to extrapolate a level a statistical significance, specifically focusing on temperature records from the last 150 years, the Industrial Age, which differ from previous climate changes in rate and magnitude.

In California, climate change may result in consequences such as the following form (CCCC 2006 and Moser et al. 2009).

1. A reduction in the quality and supply of water to the State from the Sierra snowpack.
2. Increased risk of large wildfires.
3. Reduction in the quality and quantity of certain agriculture products.
4. Exacerbation of air quality problems.
5. A rise in sea levels resulting in the displacement of coastal businesses and residences.
6. Damage to marine ecosystems and their natural environment.
7. An increase in infections, disease, asthma, and other health-related problems.
8. A decrease in the health and productivity of California's forest. (CCCC 2006 and Moser et al. 2009)

Greenhouse Gases (GHG) are gases that trap heat in the atmosphere and the presence of GHGs in the atmosphere affects the earth's temperature. The effect is equivalent to the way a greenhouse retains heat. Natural processes and human activities emit greenhouse gases. Common GHGs include water vapor, carbon dioxide, methane, nitrous oxide, ozone, chlorofluorocarbons, hydro chlorofluorocarbons, hydro fluorocarbons, per fluorocarbons, sulfur, and hexafluoride. Human activities, such as electricity production and vehicle use, have elevated the concentration of these gases in the atmosphere beyond the level of naturally occurring concentrations.

GHGs as defined by AB 32 include the following gases: carbon dioxide, methane, nitrous oxide, hydrocarbons, perfluorocarbons, and sulfur hexafluoride. GHGs as defined by AB 32 and sources are summarized in Table 3-10.

Table 3-10: Greenhouse Gases; Source: EPA, Intergovernmental Panel on Climate Change

Greenhouse Gas	Description and Physical Properties	Lifetime	GWP	Sources
Methane (CH4)	Is a flammable gas and is the main component of natural gas	12 years	21	Emitted during the production and transport of coal, natural gas, and oil. Methane emissions also result from livestock and other agricultural practices and by the decay of organic waste in municipal solid waste landfills.
Carbon dioxide (CO2)	An odorless, colorless, natural greenhouse gas.	30-95 years	1	Enters the atmosphere through burning fossil fuels (coal, natural gas and oil), solid waste, trees and wood products, and also as a result of certain chemical reactions (e.g., manufacture of cement). Carbon dioxide is removed from the atmosphere (or "sequestered") when it is absorbed by plants as part of the biological carbon cycle.

Table 3-10: Greenhouse Gases; Source: EPA, Intergovernmental Panel on Climate Change				
Greenhouse Gas	**Description and Physical Properties**	**Lifetime**	**GWP**	**Sources**
Chloro-fluorocarbons	Gases formed synthetically by replacing all hydrogen atoms in methane or ethane with chlorine and/or fluorine atoms. They are non-toxic nonflammable, insoluble and chemically unreactive in the troposphere (the level of air at the earth's surface).	55-140 years	3,800 to 8,100	Were synthesized in 1928 for use as refrigerants, aerosol propellants, and cleaning solvents. They destroy stratospheric ozone.
Hydrofluoro-carbons	A man-made greenhouse gas. It was developed to replace ozone-depleting gases found in a variety of appliances. Composed of a group of greenhouse gases containing carbon, chlorine an at least one hydrogen atom.	14 years	140 to 11,700	Powerful greenhouse gases that are emitted from a variety of industrial processes. Fluorinated gases are sometimes used as substitutes for stratospheric ozone-depleting substances. These gases are typically emitted in smaller quantities, but because they are potent greenhouse gases.
Nitrous oxide (N2O)	Commonly known as laughing gas, is a chemical compound with the formula N2O. It is an oxide of nitrogen. At room temperature, it is a colorless, non-flammable gas, with a slightly sweet odor and taste. It is used in surgery and dentistry for its anesthetic and analgesic effects.	120 years	310	Emitted during agricultural and industrial activities, as well as during combustion of fossil fuels and solid waste.
Pre-fluorocarbons	Has a stable molecular structure and only breaks down by ultraviolet rays about 60 kilometers above Earth's surface.	50,000 years	6,500 to 9,200	Two main sources of pre-fluorocarbons are primary aluminum production and semiconductor manufacturing.

Table 3-10: Greenhouse Gases; Source: EPA, Intergovernmental Panel on Climate Change				
Greenhouse Gas	**Description and Physical Properties**	**Lifetime**	**GWP**	**Sources**
Sulfur hexafluoride	An inorganic, odorless, colorless, and nontoxic nonflammable gas.	3,200 years	23,900	This gas is manmade and used for insulation in electric power transmission equipment, in the magnesium industry, in semiconductor manufacturing and as a tracer gas.

Each of the designated gases described above can reside in the atmosphere for different amounts of time, ranging from a few years to thousands of years. All of these gases remain in the atmosphere long enough to become well mixed, meaning that the amount that is measured in the atmosphere is roughly the same all over the world regardless of the source of the emission.

Potential Climate Change Impacts for California

Observed changes over the last several decades across the western United States reveal clear signs of climate change. Statewide, average temperatures increased by about 1.7 degrees Fahrenheit (°F) from 1895 to 2011, and warming has been greatest in the Sierra Nevada. The years from 2014 through 2016 showed unprecedented temperatures, with 2014 being the warmest. By 2050, California is projected to warm by approximately 2.7°F above 2000 averages, a threefold increase in the rate of warming over the last century. By 2100, average temperatures could increase by 4.1°F to 8.6°F, depending on emissions levels.

Overall, California has become drier over time, with five of the eight years of severe to extreme drought occurring between 2007 and 2016, and with unprecedented dry years in 2014 and 2015. Statewide precipitation has become increasingly variable from year to year, with the driest consecutive four years occurring from 2012 to 2015.

Global climate change risks to California include impacts to public health, water resources, agriculture, coastal sea level, forest and biological resources, and energy.

California's GHG Sources and Relative Contribution

As noted in the General Plan EIR, in 2021, the statewide GHG emissions inventory was updated for 2000 to 2019 emissions using the GWPs in IPCC's AR4. 17 Based on these GWPs, California produced 418.2 MMTCO2e GHG emissions in 2019. California's transportation sector was the single-largest generator of GHG emissions, producing 39.7 percent of the state's total emissions. Industrial sector emissions made up 21.1 percent, and electric power generation made up 14.1 percent of the state's emissions inventory. Other major sectors of GHG emissions

include commercial and residential (10.5 percent), agriculture and forestry (7.6 percent), high GWP (4.9 percent), and recycling and waste (2.1 percent).

Transportation emissions continued to decline in 2019 statewide as they had done in 2018, with even more substantial reductions due to a significant increase in renewable diesel. Since 2008, California's electricity sector has followed an overall downward trend in emissions. In 2019, solar power generation continued its rapid growth since 2013. Emissions from high-GWP gases made up 4.9 percent of California's emissions in 2019.

Tule River Reservation Emissions

The existing land uses where the Project will occur is The Village area of Tule River Reservation which generally consists of residences, retail, office, commercial, and institutional (i.e., Tribal Governance) uses. Operation of these land uses generates typical GHG emissions from natural gas used for energy, heating, and cooking; electricity usage; vehicle trips for employees and residents; area sources such as landscaping and agricultural equipment and consumer cleaning products; water demand; waste generation; and solid waste generation.

Regulatory Setting

Climate changes is a global, national, state, and local issue involving greenhouse gas emissions from all around the world; therefore, countries around the world, including the United States, have established regulations to assist in the emissions of GHGs. The following are a brief description of international, national, state, and local regulations.

International

Intergovernmental Panel on Climate Change (1998)

The United Nations and the World Meteorological Organization established the Intergovernmental Panel on Climate Change to assess the scientific, technical and socio-economical information relevant to understanding the scientific basis of risk of human-induced climate change and its potential impacts.

United Nations Framework Convention on Climate Change (1994)

Governments gather and share information on GHG emissions, national polices and best practices; launch national strategies for addressing GHG emissions and adapting to expected impacts.

Kyoto Protocol (Adopted 1997, effective 2005)

Sets binding targets for 37 industrialized countries and the European community for reducing GHG emissions at an average of 5% against 1990 levels over the five-year period of 2008-2012

Paris Climate Agreement (adopted 2015, effective 2016)

The Paris Climate Agreement is an agreement within the United UNFCCC to limit global temperature rise to 2 degrees Celsius above preindustrial levels. Under the agreement, each country determines, plans, and regularly reports its own contribution to mitigate global warming. The agreement is voluntary and is not legally binding. Its is noted that the United States withdrew from this agreement in January 2025.

Federal

The United States Environmental Protection Agency (USEPA) announced on December 7, 2009, that GHG emissions threaten the public health and welfare of the American people and that GHG emissions from on-road vehicles contribute to that threat.

To regulate GHGs from passenger vehicles, the USEPA was required to issue an endangerment finding. GHGs—CO2, CH4, N2O are applicable to the Project's GHG emissions inventory because they constitute the majority of GHG emissions and, according to guidance by the San Joaquin Valley Unified Air Pollution Control District (SJVAPCD), are the GHG emissions that should be evaluated as part of a project's GHG emissions inventory.

- *U.S. Mandatory Report Rule for Greenhouse Gases (2009)*
- *Update to Corporate Average Fuel Economy Standards (2021 to 2026)*
- *USEPA Regulation of Stationary Sources under the Clean Air Act (Ongoing)*

State

As indicated in the General Plan EIR, Current State of California guidance and goals for reductions in GHG emissions are generally embodied in Executive Order (EO) S-03-05, EO B-30-15, EO B-55-18, Assembly Bill 32 (AB 32), SB 32, and SB 375.

- *Executive Order S-03-05.* EO S-03-05, signed June 1, 2005, set the following GHG-reduction targets for the state:
  - 2000 levels by 2010.
  - 1990 levels by 2020.
  - 80 percent below 1990 levels by 2050.

- *Assembly Bill 32.* AB 32 was passed by the California state legislature on August 31, 2006, to place the state on a course toward reducing its contribution of GHG emissions. AB 32 follows the 2020 tier of emissions reduction targets established in EO S 03 05. CARB

prepared the 2008 Climate Change Scoping Plan (Scoping Plan) to outline a plan to achieve the GHG-emissions reduction targets of AB 32.

- Executive Order B-30-15. EO B-30-15, signed April 29, 2015, set a goal of reducing GHG emissions in the state to 40 percent of 1990 levels by year 2030. EO B-30-15 also directed CARB to update the Scoping Plan to quantify the 2030 GHG reduction goal for the state and requires state agencies to implement measures to meet the interim 2030 goal as well as the long-term goal for 2050 in EO S-03- 05. It also requires the Natural Resources Agency to conduct triennial updates of the California adaption strategy, Safeguarding California, to ensure climate change is accounted for in state planning and investment decisions.

- Senate Bill 32 and Assembly Bill 197. In September 2016, SB 32 and AB 197 were signed into law, making the EO goal for year 2030 into a statewide mandated legislative target. AB 197 established a joint legislative committee on climate change policies and requires CARB to prioritize direct emissions reductions rather than the market-based cap-and-trade program for large stationary, mobile, and other sources.

- 2017 Scoping Plan Update. EO B-30-15 and SB 32 required CARB to prepare another update to the Scoping Plan to address the 2030 target for the state. On December 24, 2017, CARB adopted the 2017 Scoping Plan Update, which outlined potential regulations and programs, including strategies consistent with AB 197 requirements, to achieve the 2030 target. The 2017 Scoping Plan established a new emissions limit of 260 MMTCO2e for the year 2030, which corresponds to a 40 percent decrease in 1990 levels by 2030.

In addition to the statewide strategies listed here, the 2017 Scoping Plan also identified local governments as essential partners in achieving the State's long-term GHG reduction goals and identified local actions to reduce GHG emissions. The statewide per-capita goals were developed by applying the percentage reductions necessary to reach the 2030 and 2050 climate goals (i.e., 40 and 80 percent, respectively) to the State's 1990 emissions limit established under AB 32.

For California Environmental Quality Act (CEQA) projects, CARB states that lead agencies have the discretion to develop evidenced-based numeric thresholds (mass emissions, per capita, or per service population)—consistent with the Scoping Plan and the state's long-term GHG goals.

The 2017 Scoping Plan scenario is set against what is called the business-as-usual yardstick—that is, what would the GHG emissions look like if the State did nothing at all beyond the existing policies that are required and already in place to achieve the 2020 limit, as shown in Table 4.8-3, 2017 Climate Change Scoping Plan Emissions Reductions Gap. Table 4.8-4, provides estimated GHG emissions by sector, compared to 1990 levels, and the range of GHG emissions for each sector estimated for 2030

Executive Order B-55-18. EO B-55-18, signed September 10, 2018, sets a goal "to achieve carbon neutrality as soon as possible, and no later than 2045, and achieve and maintain net negative emissions thereafter." EO B-55-18 directs CARB to work with relevant state agencies to ensure future Scoping Plans identify and recommend measures to achieve the carbon neutrality goal.

The 2022 Scoping Plan is currently being updated by CARB to address the GHG-reduction goals of EO B-55-18 by 2045. The 2022 Scoping Plan update will consider carbon stock and sequestration and carbon dioxide removal. Based on the preliminary modeling results identified in CARB's April 20, 2022, workshop, the measures in the Scoping Plan will achieve 80 percent below 1990 levels by 2050. The Draft 2022 Scoping Plan was released May 10, 2022, and final adoption is anticipated in late fall 2022.

Senate Bill 375. In 2008, SB 375, the Sustainable Communities and Climate Protection Act, was adopted to connect the GHG emissions-reductions targets established in the 2008 Scoping Plan for the transportation sector to local land use decisions that affect travel behavior. The Tulare County Association of Governments (TCAG) is the MPO for the Tulare region, including the Tule River Reservation. Pursuant to the recommendations of the Regional Transportation Advisory Committee (RTAC), CARB adopted per-capita reduction targets for each of the MPOs rather than a total magnitude reduction target.

2017 Update to the SB 375 Targets. CARB is required to update the targets for the MPOs every eight years. In June 2017, CARB released updated targets and technical methodology and recently released another update in February 2018, which became effective in October 2018.

Regional

San Joaquin Valley Air Pollution Control District

The San Joaquin Valley Air Pollution Control District is made up of eight counties in California's Central Valley: San Joaquin, Stanislaus, Merced, Madera, Fresno, Kings, Tulare, and Kern. The Valley Air District is governed by a Governing Board consisting of representatives from the Board of Supervisors of all eight counties, one Health and Science member, one Physician, and five Valley city representatives.

SJVAPCD CEQA Greenhouse Gas Guidance. The SJVAPCD approach is intended to streamline the process of determining if Project specific GHG emissions would have a significant effect. Best Performance Standards would be established according to performance-based determinations

San Joaquin Valley Carbon Exchange. Intended to quantify, verify, and track voluntary GHG emissions reductions generated within the San Joaquin Valley

Rule 2301. Emission Reduction Credit Banking. Provided an administrative mechanism for sources to bank GHG emissions, mechanism for sources to transfer GHG reductions to other users and defines eligibility standards, quantitative and procedures.

Tulare County Association of Governments (MCAG)

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

The 2022 RTP/SCS noted that the Sustainable Communities and Climate Protection Act of 2008 (SB 375) requires that California's 18 MPOs, including TCAG, incorporate an integrated Sustainable Communities Strategy (SCS) as part of the RTP/SCS. Related to greenhouse gas (GHG) emissions, SB 375 also requires that SCS's must be able to achieve the GHG reduction targets established by the California Air Resources Board (CARB). With the implementation of this Plan, the Tulare region can meet and exceed the greenhouse gas (GHG) targets provided under SB 375. It is noted that TCAG is in the process of preparing its draft 2026 RTP/SCS.

Local

None that apply to the Project.

3.4 Thresholds and Methodology

The impact analysis provided in Chapter 2.6 is based on the application of the following California Environmental Quality Act (CEQA) Guidelines Appendix G, which indicates that a project would have a significant impact on greenhouse gas emissions if it would:

1. *Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.*
2. *Conflict with an applicable plan, policy or regulations adopted for the purpose of reducing the emissions of greenhouse gas emissions.*

GHG emissions and climate change were evaluated in accordance with Appendix G of the 2024 CEQA Guidelines. CEQA Guidelines Section 15064.4 states that, when making a determination with respect to the significance of a project's GHG emissions, a lead agency shall have discretion to determine whether to: (1) Use a model or methodology to quantify greenhouse gas emissions resulting from a project, and which model or methodology to use; and/or (2) Rely on a qualitative analysis or performance-based standards. Section 15064.4 also states that a lead agency should consider the following factors when assessing the significance of the impact of GHG emissions on the environment: (1) The extent to which the project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting; (2) Whether the project emissions exceed a threshold of significance that the lead

agency determines applies to the project; and (3) 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.

GHG emissions were calculated in the same CalEEMod model used to determine the proposed project's criteria air pollutant emissions. Consistent with SJVAPCD recommendations, construction emissions were amortized over a thirty-year period and added to the annual operational emissions to determine the proposed Project's annual GHG emissions. Consistent with CEQA Guidelines Section 15064(h)(3), project significance was determined based on the proposed Project's consistency with an approved plan or mitigation program that provides specific requirements that will avoid or substantially lessen the cumulative problem within the geographic area of the proposed Project. CARB's 2017 Scoping Plan applies to the proposed Project and are intended to reduce GHG emissions to meet the statewide targets set in Senate Bill (SB) 32. The project efficiency threshold of 6.7 MT CO2e.yr/capita was derived from the CARB Scoping Plan and used to determine the Project's potential impact on greenhouse gas emissions. Thus, the proposed Project would not have a significant effect on the environment if it were found to be consistent with CARB's 2017 Scoping Plan efficiency metric.

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

No Impact: As noted in the HRA Report (page 15), "Construction GHG emissions were estimated using CalEEMod, as described in Section 5 Methodology [of the HRA Report]. Operational GHG emissions would consist of minor lighting electricity use and occasional maintenance trips, resulting in negligible operational GHG emission levels. Combined construction and operational GHG emissions are presented in Table 4 [of the HRA Report]." "GHG emissions are provided for informational purposes only. The Project would not generate substantial long-term GHG emissions. No CEQA significance determination is provided within this HRA for GHG emissions." (HRA Report, page 16). As discussed in the Criteria Pollutants section above [see Item III Air Quality b)], emissions are expected to be even lower with implementation of all State, regional, and local measures."

Construction. Greenhouse gases would be generated during construction-related activities such as site preparation, grading, building construction, application of architectural coatings, and paving. The CalEEMod Emissions report included in Table 2.2.1 in Appendix A of the HRA Report calculates that this Project will create unmitigated maximums of 2,577.67 MT of CO2e emissions during summer months; 1,807.14 MT of CO2e emissions during winter months; 802.504 MT of CO2e emissions on a daily average; and 132.864 MT of CO2e emissions annually. Because Project construction would generate less GHG emissions than this threshold, impacts related to GHG emissions during Project construction would be less than significant.

Operation. As shown in Table 2.3 Operations Emissions Compared Against Thresholds contained in Appendix A of the HRA Report, the proposed Project would not result in any operational greenhouse gas emissions. Operational emissions are projected to remain below established thresholds as there would be no increases to vehicular traffic/trips as the Project is pedestrian oriented.

The SJVAPCD has not formally provided guidance on how to analyze GHG emissions impacts for projects within their San Joaquin Valley Air Basin (SJVAB). Until such time as SJVAPCD provides formal guidance, the following alternative metrics used by air districts in California to assess GHG emissions impacts have been identified:

Also as noted in Table 2.3 Operations Emissions Compared Against Thresholds contained in Appendix A of the HRA Report, there would be no total operational GHG per year. As noted earlier, the Project is pedestrian oriented. As such, the proposed Project would not obstruct implementation of the CARB Scoping Plan and would not conflict with the land use concept plan in TCAG's 2022 RTP/SCS. Therefore, based on the analysis and information provided herein, and in the HRA report (see Appendix A) prepared by qualified consultants Core Environmental Consulting, there would be *no impact* from the Project's operational GHG emissions.

Mitigation Measures: None Required.

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

No Impact:. Applicable plans adopted for the purpose of reducing GHG emissions include CARB's Scoping Plan and the 2022 TCAG RTP/SCS. A consistency analysis with these plans is presented herein.

The CARB Scoping Plan is applicable to state agencies but is not directly applicable to cities/counties and individual projects (i.e., the Scoping Plan does not require local jurisdictions to adopt its policies, programs, or regulations to reduce GHG emissions). However, new regulations adopted by the State agencies from the Scoping Plan result in GHG emissions reductions at the local level. Future development projects would be required to comply with state GHG emissions reduction measures because they are statewide strategies. The proposed project would not obstruct implementation of the CARB Scoping Plan, and the would be no impact.

Regional Transportation Plan and Sustainable Communities Strategy SB 375 requires each MPO to prepare an SCS in its RTP. TCAG updated and adopted an SCS in its RTP on August 15, 2022 Resolution No. (2022-141). "The SB 375 per capita GHG reduction targets for SCSs set by CARB are considered an important benchmark for progress in reducing GHG from travel activity. In setting the per capita GHG reduction targets from auto and light truck emissions

by 2020 (13% for TCAG) and 2035 (16% for TCAG) from 2005 levels, CARB balances the reduction contribution needed from this component of the Scoping Plan with the ability of the regions to reasonably demonstrate reductions through their SCSs, which are an integral part of fiscally constrained Regional Transportation Plans." (Chapter C SCS, page C-3 https://tc-web.acquiadam.com/assets/share/asset/54bjfv72iv). "It is important to note that a significantly lower population projection for the year 2040 may make it more difficult to achieve GHG reduction targets and harder to implement higher density and mass transportation solutions. Notwithstanding, the 2022 RTP/SCS represents an enhanced effort in GHG per capita reductions as compared to the previous RTP/SCSs, considering updated demographics assumptions. The 2022 RTP/SCS includes higher density with an emphasis on transit-oriented development near Cross-Valley Corridor stations and implementation of the Phase I express bus service all the corridor providing a commute alternative for SR 99, SR 198, SR 65, and SR 63." (SCS, page C-14).

The nature of the Project, summarized as pedestrian enhancements and two pedestrian bridges, would be consistent with all applicable State plans, policies, and regulations. Based on the analysis and information provided herein, the Project would not generate a cumulatively considerable GHG impact, nor would it conflict with any applicable plan, policy or regulation adopted for the purpose of reducing GHG emissions. Therefore, based on the information and analysis contained herein, and in the HRA report (see Appendix A) prepared by qualified consultants Core Environmental Consulting, there would be *no impact* to this resource.

Mitigation Measures: None Required.

Mitigation Measures: None Required.

Based on the analysis and information provided herein, and in the HRA report (see Appendix A) prepared by qualified consultants Core Environmental Consulting, *no mitigation measures are required*.

Cumulative Impact: Less than Significant.

As noted in the General Plan EIR, Project-related GHG emissions are not confined to a particular air basin but are dispersed worldwide. Therefore, impacts under impact discussion Item VIII a) are not project-specific impacts to global warming, but are the proposed Project's contribution to this cumulative impact. As described under impact discussion Item VIII a) , implementation of the proposed Project would only result in an increase in GHG emissions during the Project's construction-related activities. Therefore, overall regional planning area emissions (including this Project's-related GHG emissions and their contribution to global climate change), would not be cumulatively considerable, and GHG emissions impacts would be less than significant, the same as Impact note at Item VIII a). As this Project does not cover a broad-based area, and its emissions will include short-term, temporary, and intermittent, construction-related

activity emissions which will end upon cessation of construction-related activities. Operational emissions are projected to remain below established thresholds as there would be no increases to vehicular traffic/trips as the Project is pedestrian oriented. Therefore, based on the analysis and information provided herein, and although not significant in and of itself, the overall Project impact would result in a *less than significant cumulative impact*.

IX. HAZARDS AND HAZARDOUS MATERIALS

Would the Project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less than Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☑	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☑	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☑	☐
d) Be located on a Site which is included on a list of hazardous materials Sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard or excessive noise 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 significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☑

Environmental Setting

Hazardous Materials Sites

The Department of Toxic Substances Control's (DTSC's) EnviroStor was used to identify any sites associated with the release of hazardous materials or wastes within the Project area. A search of EnviroStor confirmed that neither the Project Site nor the Tule River Reservation is within or near a hazardous area or site. (See: https://www.google.com/maps/@36.0332328,-118.8449611,13z?hl=en-US&entry=ttu&g_ep=EgoyMDI1MDYxNy4wIKXMDSoASAFQAw%3D%3D).

California Government Code Section 65962.5 requires the CalEPA to compile, maintain, and update specified lists of hazardous material release sites. CEQA Section 21092.6 requires the lead agency to consult the lists compiled pursuant to Government Code Section 65962.5 to determine whether the project and any alternatives are identified on any of the following lists:

- USEPA National Priorities List. The USEPA's National Priorities List includes all sites under the USEPA's Superfund program, which was established to fund cleanup of contaminated sites that pose risks to human health and the environment.
- USEPA CERCLIS and Archived Sites. The USEPA's Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) includes a list of 15,000 sites nationally identified as hazardous sites. This would also involve a review for archived sites that have been removed from CERCLIS due to No Further Remedial Action Planned status.
- USEPA RCRIS (RCRA Info). The Resource Conservation and Recovery Act Information System (RCRIS or RCRA Info) is a national inventory system about hazardous waste handlers. Generators, transporters, handlers, and disposers of hazardous waste are required to provide information for this database.
- DTSC Cortese List. The DTSC maintains the Hazardous Waste and Substances Sites (Cortese) list as a planning document for use by the State and local agencies to comply with the CEQA requirements in providing information about the location of hazardous materials release sites. This list includes the Site Mitigation and Brownfields Reuse Program Database.
- DTSC HazNet. The DTSC uses this database to track hazardous waste shipments.
- SWRCB LUSTIS. Through the Leaking Underground Storage Tank Information System (LUSTIS), the SWRCB maintains an inventory of Underground Storage Tanks (USTs) and LUSTs, which tracks unauthorized releases.

Schools

As some land uses are considered more sensitive to airborne hazardous materials than others due to the types of population groups or activities involved. Because sensitive population groups include children, the California Environmental Quality Act (CEQA) requires an evaluation of hazardous emissions or handling hazardous materials, substances, or waste within 0.25 miles of an existing or proposed school, private or public. The nearest school to the Project area is Towanits K-5 Elementary School. As noted earlier, the Envirostor search indicated that neither the Project Site nor the Tule River Reservation is within or near a hazardous area or

site. As such, regardless of any nearby school, there are no hazardous sites within or near the Project area.

Airport Hazards

The nearest public airport is Porterville Municipal Airport; approximately 14 miles west of the Project site. Due to this distance, the Project not located within an airport land use plan.

Regulatory Setting

Federal

United States Environmental Protection Agency

The United States Environmental Protection Agency (USEPA) is the primary federal agency that regulates hazardous materials and waste. In general, the USEPA works to develop and enforce regulations that implement environmental laws enacted by Congress. The agency is responsible for researching and setting national standards for a variety of environmental programs, delegating the responsibility for issuing permits, and monitoring and enforcing compliance to states and Native American tribes. USEPA programs promote handling hazardous wastes safely, cleaning up contaminated land, and reducing waste volumes through such strategies as recycling. California falls under the jurisdiction of USEPA Region 9. Under the authority of the Resource Conservation and Recovery Act (RCRA) and in cooperation with State and tribal partners, the USEPA Region 9 Waste Management and Superfund Divisions manage programs for site environmental assessment and cleanup, hazardous and solid waste management, and underground storage tanks.

United States Department of Transportation

The United States Department of Transportation (USDOT) has the regulatory responsibility for the safe transportation of hazardous materials between states and internationally. The USDOT regulations govern all means of transportation, except for those packages shipped by mail, which are covered by United States Postal Service regulations. The federal RCRA of 1976 (described subsequently) imposes additional standards for the transport of hazardous wastes.

Occupational Safety and Health Administration

The Occupational Safety and Health Administration (OSHA) requires specific training for hazardous materials handlers, provision of information to employees who may be exposed to hazardous materials, and acquisition of material safety data sheets from materials manufacturers. The material safety data sheets describe the risks, as well as proper handling

and procedures, related to specific hazardous materials. Employee training must include response and remediation procedures for hazardous materials releases and exposures.

State

California Environmental Protection Agency

One of the primary State agencies that regulate hazardous materials is CalEPA. CalEPA is authorized by the USEPA to enforce and implement certain federal hazardous materials laws and regulations. The California DTSC, a department of the CalEPA, protects California and its residents from exposure to hazardous waste, primarily under the authority of the RCRA and the California Health and Safety Code. The DTSC requirements include the need for written programs and response plans, such as Hazardous Materials Business Plans. The DTSC programs include dealing with aftermath clean-ups of improper hazardous waste management, evaluation of samples taken from sites, enforcement of regulations regarding use, storage, and disposal of hazardous materials, and encouragement of pollution prevention.

California Division of Occupational Safety and Health

Like OSHA at the federal level, the California Division of Occupational Safety and Health (Cal/OSHA) is the responsible State-level agency for ensuring workplace safety. Cal/OSHA assumes primary responsibility for the adoption and enforcement of standards regarding workplace safety and safety practices. In the event that a work site is contaminated, a Site Safety Plan must be crafted and implemented to protect the safety of workers. Site Safety Plans establish policies, practices, and procedures to prevent the exposure of workers and members of the public to hazardous materials originating from the contaminated site or building.

California Office of Emergency Services (Cal OES)

Cal OES was established as part of the Governor's Office on January 1, 2009. It was created pursuant to Assembly Bill (AB) 38, which merged the duties, powers, purposes, and responsibilities of the former Governor's Emergency Management Agency with those of the Governor's Office of Homeland Security. Cal OES is responsible for the coordination of overall State agency response to major disasters in support of local government. The agency is responsible for ensuring the State's readiness to respond to and recover from all hazards—natural, humanmade, emergencies, and disasters—and for assisting local governments in their emergency preparedness, response, recovery, and hazard mitigation efforts.

California Department of Transportation (Caltrans) and California Highway Patrol (CHP)

Caltrans and the CHP are the two State agencies that have primary responsibility for enforcing federal and State regulations and responding to hazardous materials transportation

emergencies. Caltrans is also the first responder for hazardous material spills and releases that occur on highways, freeways, and intercity rail lines. The CHP enforces hazardous materials and hazardous waste labeling and packing regulations designed to prevent leakage and spills of materials in transit and to provide detailed information to cleanup crews in the event of an accident.

California Building Code

The State of California provided a minimum standard for building design through the California Building Code (CBC), which is found in Title 24, Part 2 of the California Code of Regulations. The CBC is updated every three years. It is generally adopted on a jurisdiction-by-jurisdiction basis and may be subject to further modification based on local conditions. Commercial and residential buildings are plan-checked by local city and county building officials for compliance with the typical fire safety requirements of the CBC, including the installation of sprinklers in all high-rise buildings and the establishment of fire-resistance standards for fire doors and building materials. Section 414 of the CBC includes requirements for buildings and structures occupied for the manufacturing, processing, dispensing, use, or storage of hazardous materials.

California Health and Safety Code

California Health and Safety Code Chapter 6.95 and California Code of Regulations Title 19, Section 2729 set out the minimum requirements for business emergency plans and chemical inventory reporting. These regulations require businesses to provide emergency response plans and procedures, training program information, and a hazardous material chemical inventory disclosing hazardous materials stored, used, or handled on-site. A business that uses hazardous materials or a mixture containing hazardous materials must establish and implement a business plan if the hazardous material is handled in certain quantities.

California Fire Code

California Code of Regulations, Title 24, also known as the California Building Standards Code, contains the California Fire Code (CFC), included as Part 9. Updated every three years, the CFC includes provisions and standards for emergency planning and preparedness, fire service features, fire protection systems, hazardous materials, fire flow requirements, and fire hydrant locations and distribution. Similar to the CBC, the CFC is generally adopted on a jurisdiction-by-jurisdiction basis, subject to further modification based on local conditions.

Regional

Central Valley Regional Water Quality Control Board

The Porter-Cologne Water Quality Control Act established the State Water Resources Control Board (SWRCB) and divided the state into nine regional basins, each under the jurisdiction of a Regional Water Quality Control Board (RWQCB). The Central Valley Region (Region 5) is the RWQCB that regulates water quality in the Project Area. The Central Valley RWQCB has the authority to require groundwater investigations when the quality of groundwater or surface waters of the state is threatened, and to require remediation actions, if necessary.

San Joaquin Valley Air Pollution Control District

The San Joaquin Valley Air Pollution Control District (SJVAPCD or Air District) has primary responsibility for control of air pollution from sources other than motor vehicles and consumer products (which are the responsibility of CalEPA and California Air Resources Board [CARB]). The SJVAPCD is responsible for preparing attainment plans for non-attainment criteria pollutants, control of stationary air pollutant sources, and the issuance of permits for activities including demolition and renovation activities affecting asbestos-containing materials (District Regulation VII, Rule 7050).

Local

The Tule River Tribe would address hazards and hazardous materials issues as they occur.

Discussion

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

Less Than Significant Impact: Project construction-related activities may involve the use and transport of hazardous materials. The use of such materials would be short-term, temporary, and intermittent and would cease when construction-related activities are completed. As the nature of the Project is pedestrian enhancements/improvements and safety oriented, daily operations would not result in the transport, use, or disposal of hazardous materials. Based on the analysis and information provided herein, the proposed Project would have a *less than significant* impact.

Mitigation Measures: None Required.

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

Less Than Significant Impact: As noted earlier, the Project site currently contains Tribal governance and residential uses, the South Fork of the Tule River, and natural vegetation.

The most recent Envirostor query does not show any record of hazardous materials. Other than the areas where the Project's pedestrian enhancements/improvements would occur, it is unlikely that the Project's construction-related activities would pose a reasonably foreseeable condition or incident that could result in significant release of hazardous materials into the environment. During construction-related activities, potential accidental releases of standard fuels, solvents, or chemicals typical of construction of this type of project may occur. Should an accidental hazardous release occur, existing regulations for handling hazardous materials may require coordination with the Tule River Fire Department (or DTSC) for an appropriate plan of action, which can include studies or testing to determine the nature and extent of contamination, as well as handling and proper disposal. Given the nature of the Project as pedestrian enhancements/improvements to provide safe walking and cycling within the existing land use environment, the operation of the Project does not pose 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. Therefore, based on the analysis and information provided herein, impacts would be *less than significant.*

Mitigation Measures: None Required.

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

No Impact: Project operations will not emit hazardous emissions or handle hazardous materials, substances, or wastes. The existing Towanits K-5 Elementary School will be one of the facilities that would directly benefit from the pedestrian improvements (e.g., via sidewalks, a trail, and crosswalks proposed by the Project). Since the Project would not emit hazardous emissions or involve handling acutely hazardous. Compliance with applicable federal, state, and local rules/regulations would also ensure that the Project would not expose the nearest school to hazardous risks. Based on the analysis and information provided herein, there would be *no impact.*

Mitigation Measures: None Required.

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

No Impact: The Project Site is not listed as a hazardous materials site under Government Code Section 65962.5, nor is the Project Site identified in DTSC's EnviroStor or SWRCB's GeoTracker hazardous databases. Based on the analysis and information provided herein, there would be *no impact.*

Mitigation Measures: None Required.

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

No Impact: The proposed Project is located approximately 14 miles east of Porterville Municipal Airport and is not located within an airport land use plan area. Implementation of the proposed Project would not result in a safety hazard or excessive noise for people residing or working in the Project area. Based on the analysis and information provided herein, there would be *no impact*.

Mitigation Measures: None Required.

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

Less Than Significant Impact: The Project would not impair or interfere with an adopted emergency response plan or evacuation plan. During construction-related activities and depending upon work activity location, it is possible that temporary disruption could occur along roadways (North and South Reservation Roads). However, a traffic control plan would be implemented to ensure safe passage in the unlikely occurrence of an emergency event. Also, the Project would result in short-term, temporary, and intermittent physical disruptions. For example, construction-related activity directly adjacent to roadways could result in disruptions; however, work on the pedestrian bridges would not. In addition, the Tule River Fire Department would be available to assist in procedures to ensure consistency with emergency response and evacuation needs. Based on the analysis and information provided herein, there would be *a less than significant impact*.

Mitigation Measures: None Required.

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

Less than Significant Impact: The Project Site is located in the Federal Responsibility Area thus it is not classified by Cal Fire meaning the financial responsibility of preventing and suppressing wildfires is primarily the responsibility of a federal agency (see Fire Hazard Severity Zones map at: https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones). The Division of Forestry and Wildland Fire Management (DFWFM) oversees the National Indian Forestry and Wildland Fire Management Program which is an effort between the U.S. Department of the Interior, the Bureau of Indian Affairs, and other federal agencies and tribal governments. The Tule River

Tribe and Reservation is a federally recognized tribe of Native Americans located on the eastern side of Tulare County. The Tule River Fire Department supports fire protection services within the Reservation. The Tule River Fire Department would likely be the first responder to any fire event in the Tule River Reservation; however, if a wildland fire were to occur, federal resources would be utilized. As the nature of the Project is pedestrian enhancements/improvements to provide a safe walking environment, the Project in and of itself would not expose people or structures to significant risks from wildland fires. Therefore, based on the analysis and information provided herein, *no impact* would occur.

Mitigation Measures: None Required.

Mitigation Measures: None Required.

Based on the analysis and information provided herein, *no mitigation measures are required*.

Cumulative Impact: Potentially Significant.

The cumulative area is limited to the Tule River Reservation. As discussed previously, the nature of the Project (summarized as pedestrian safety enhancements and pedestrian bridges) would not result in a significant impact from the increased use of hazardous household materials. The Project would not interfere with implementation of emergency response plans. In addition, potential project-level impacts associated with hazards and hazardous materials would be further reduced through compliance with state and federal regulations. Since impacts associated with hazardous materials, are, by their nature, focused on specific sites or areas, the less-than-significant impacts from the Project would not contribute to a cumulative increase in hazards in the immediate vicinity outside of the Tule River Reservation or throughout the region. Therefore, the potential for cumulative impacts associated with hazards and hazardous materials would *be less than significant* and no mitigation measures are required.

X.HYDROLOGY AND WATER QUALITY

Would the Project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements or otherwise sustainably degrade surface or ground water quality?	☐	☑	☐	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin?	☐	☐	☐	☑
c) Substantially alter the existing drainage pattern of the Site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner, which would:	☐	☐	☑	☐
(i) result in substantial erosion or siltation on- or off-site?	☐	☐	☑	☐
(ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?	☐	☐	☑	☐
(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 the release of pollutants due to Project inundation?	☐	☐	☐	☑
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater movement plan?	☐	☐	☑	☐

Environmental Setting

Regional Hydrology:

The Tule Reservation Area does not lie within any watershed. The South Fork of the Tule River meanders to and drains into Success Lake. Prior to construction of Shafer Dam, the South Fork of the Tule River naturally drained into the Tule River.

Local Hydrology

The Project lies within the South Fork of the Tule River drainage basin. The topography of the Project Area gently slopes toward the northeast. Stormwater runoff within the Project Area is largely naturally conveyed toward the River with natural percolation absorbing (that is draining) the majority of runoff prior to reaching the river. The impervious surfaces of the local roadway network allows stormwater to drain toward the edges of the roadways where natural percolation and evaporation would occur.

Groundwater

Due to the natural soils and relatively shallow depth of soils over granitic rock, groundwater is limited to fissures in the bedrock. Because of these features, most stormwater within the Project area would percolate to the subsurface impervious bedrock and subsequently flow toward and seep (drain) into the nearby river.

Climate

The area experiences a semiarid, Mediterranean climate, which consists of hot, dry summers with low humidity and very mild winters. The area receives about 9.1 inches of rain annually, which is primarily recorded during the five-month stretch between December and March.14 The winter average low temperature is about 38 degrees Fahrenheit, and the average summer high temperature is about 95 degrees Fahrenheit.

Water Quality

Surface water quality is affected by point-source and nonpoint-source pollutants. Point source pollutants are emitted at a specific point, such as a pipe, and nonpoint-source pollutants are typically generated by surface runoff from diffuse sources, such as streets, paved areas, and landscaped areas. Point-source pollutants are controlled with pollutant discharge regulations or water discharge requirements. Nonpoint source pollutants are more difficult to monitor and control, although they are important contributors to surface water quality in urban areas.

Generally, stormwater runoff pollutants vary based on land use, topography, the amount of impervious surface, the amount and frequency of rainfall, and irrigation practices. Runoff in developed areas typically contains oil, grease, and metals accumulated in streets, driveways, parking lots, and rooftops, as well as pesticides, herbicides, particulate matter, nutrients, animal waste, and other oxygen-demanding substances from landscaped areas. The highest pollutant concentrations usually occur at the beginning of the wet season during the “first flush,” when early rainfall flushes out pollutants that have accumulated on hardscape surfaces during the preceding dry months.

Flood Zones

The Federal Emergency Management Agency (FEMA) identifies floodplain zones to assist cities with mitigating flooding hazards through land use planning. FEMA also outlines specific regulations for any construction within a 100-year floodplain. The 100-year floodplain is defined as an area that has a one percent chance of being inundated during a 12-month period. Although FEMA does not provide information within the Project area, the FIRM map immediately west/northwest of the Tule River Indian Reservation FIRM map shows Flood Zone A within the bounds of the Tule River. This is likely due to the topography of the area which generally slopes toward the river thereby confining potential floodwater within the river's existing channel (see Tule River Indian Reservation, 065066; 06107C1695E6 6/16/2009 as: https://hazards-fema.maps.arcgis.com/apps/webappviewer/index.html?id=8b0adb51996444d4879338b5529aa9cd&extent=-120.22581757761441,36.77078148069618,-119.60509003855205,37.04530192606378).

It is noted; however, that exceptional atmospheric storm events during periods of 2022 and 2023 resulted in substantial flows of the Tule River resulting in local flooding along Village area and resulted in significant damage to the existing pedestrian bridge rendering it unusable. Hence, the need to replace the pedestrian bridge.

Figure 3-2 Flood Zones



Dam Inundation

The Project Area is not within the inundation zones in the unlikely event of catastrophic failure of Schafer Dam; therefore, it is not within a Dam Inundation Zone. As noted earlier, the South Fork of the Tule River would naturally drain into the Tule River prior to the construction of Schafer Dam and the subsequent formation of Lake Success.

Tsunami

A tsunami is a series of traveling ocean waves generated by a rare, catastrophic event, including earthquakes, submarine landslides, and submarine or shoreline volcanic eruptions. The Project Area is approximately 120 miles east of the Pacific Ocean, including the intervening Coastal Range that would serve as a physical barrier to tsunami waters. As such, a tsunami event does not represent a threat to the Project site.

Seiche

A seiche is an oscillation of a body of water in an enclosed or semi-enclosed basin such as a reservoir, harbor, lake, or storage tank. Seiches can be created by winds, earthquakes, or tsunamis. Bodies of water such as bays, harbors, lakes, reservoirs, or large aboveground storage tanks can experience seiches. There are no large bodies of water within the Project Area that could trigger a seiche.

Regulatory Setting

Federal

Clean Water Act

The Clean Water Act (CWA) is enforced by the U.S. EPA and was developed in 1972 to regulate discharges of pollutants into the waters of the United States. The Act made it unlawful to discharge any pollutant from a point source into navigable waters unless a National Pollution Discharge Elimination System (NPDES) Permit is obtained.

National Flood Insurance Act

The Federal Emergency Management Agency (FEMA) is tasked with responding to, planning for, recovering from, and mitigating disasters. The Federal Insurance and Mitigation Administration within FEMA is responsible for administering the National Flood Insurance Program (NFIP) and administering programs that aid with mitigating future damages from natural hazards.

State

California Water Quality Porter-Cologne Act

California's primary statute leading water quality and water pollution concerns with respect to both surface waters and groundwater is the Porter-Cologne Water Quality Control Act of 1970 (Porter-Cologne Act). The Porter-Cologne Act grants the State Water Resource Control Board (SWRCB) and each of the nine Regional Water Quality Boards (RWQCB) power to protect water quality and further develop the Clean Water Act within California. The applicable RWQCB for the proposed Project is the Central Valley RWQCB.

Central Valley RWQCB: The proposed Project is within the jurisdiction of the Central Valley Regional RWQCB. The Central Valley RWQCB may require an NPDES Permit and Stormwater Pollution Prevention Plan (SWPPP) for projects disturbing more than one acre of total land area. Because the Project is greater than one cumulative acre, an NPDES Permit and SWPPP will be required.

Discussion

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

Less Than Significant Impact with Mitigation Incorporated: The nature of the Project (pedestrian safety enhancements and pedestrian bridges) would not substantially degrade surface or ground-water quality. Construction-related activities, which would be short-term, temporary, and intermittent, would likely involve excavation, grading, and other earthwork within the Project location. Depending upon the season construction-related activities occur, during storm events, exposed construction areas on the Project Site may cause runoff to carry pollutants such as chemicals, oils, sediment, and debris. Additionally, potential soil erosion and the size of the Project Site necessitates the implementation of a SWPPP for the Project. The SWPPP identifies all potential pollution sources that could affect stormwater discharges from the Project Site and specifies BMPs for stormwater runoff. Chemicals or surfactants used during Project maintenance or operations may also discharge into the environment, potentially affecting water quality standards.

Moreover, the Project would implement Mitigation Measures HYD-1 and HYD-2 which require steps to minimize impacts on water quality during construction. Mitigation Measure HYD-1, before any construction or grading begins, the Applicant must submit a NOI for discharge from the Project Site to the California SWRCB Storm Water Permit Unit. A copy of this NOI must also be submitted to the project proponent before the issuance of grading permits, with the project proponent reviewing the documentation and conducting site inspections during construction to ensure compliance. Mitigation Measure HYD-2 requires the building

contractor to prepare and submit a SWPPP to the project proponent for approval at least 45 days before construction starts. The contractor is responsible for understanding and adhering to the State General Permit and implementing the SWPPP, which outlines potential pollutant sources and specifies BMPs to control site discharges. These BMPs include dust control, monitoring for erosion and sedimentation control, use of detention basins and erosion control materials, covering soil stockpiles and graded slopes during inactivity or extreme weather, and strictly preventing spills and pollutant discharges through proper material storage, trash disposal, and site management. Further, it is noted that as the project would be funded through Caltrans, the Project must comply with Caltrans' specifications, standards, requirements, etc., (collectively referred to as "requirements"). Caltrans' requirements are not mitigation measures as they would be required regardless of magnitude of impacts. Simply stated, if Caltrans requires a specific practice to satisfy one of their requirements, it must be performed to their satisfaction.

Therefore, based on the analysis and information provided herein, impacts would be less *than significant with mitigation.*

Mitigation Measures: See Mitigation Measures HYD-1 and HYD-2.

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

No Impact: As noted previously, the nature of the Project (that is, pedestrian safety enhancements and pedestrian bridges) would not substantially decrease groundwater supplies or interfere with groundwater recharge such that the Project may impede sustainable groundwater management of the basin. As the Project would not result in any additional use of groundwater beyond the existing use.

Therefore, based on the analysis and information contained herein, the impact on water resources would be *less than significant.*

Mitigation Measures: None Required.

c) Would the Project substantially alter the existing drainage pattern of the Site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner, which would: i) result in substantial erosion or siltation on- or offsite; 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.

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

Less Than Significant Impact: The proposed Project involves the construction of pedestrian bridges, sidewalks, and trails to enhance pedestrian safety within the Project location. During the short-term, temporary, and intermittent construction-related activities, an existing drainage pattern may be altered. However, by implementing the previously noted SWPPP, erosion control measures designed to prevent significant impacts related to erosion caused by runoff during construction-related activities would prevent substantial erosion or siltation on or off the Site.

Therefore, through regulatory compliance, and based on the analysis and information provided herein, the Project's impact would be *less than significant.*

Mitigation Measures: None Required.

ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?

Less Than Significant Impact: As noted previously, the nature of the Project can be summarized as pedestrian safety enhancements and pedestrian bridges, sidewalks, and paths that would not result in a substantial increase of impervious surfaces within the Project Site. As such, the Project would not result in a substantial increase in surface runoff. Therefore, through regulatory compliance, and based on the analysis and information provided herein, the Project would have a *less than significant impact*.

Mitigation Measures: None Required.

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

Less Than Significant Impact: As noted earlier, the nature of the Project (that is, pedestrian safety enhancements and pedestrian bridges, sidewalks, and paths), would not create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. The previously noted SWPPP would ensure that polluted runoff during short-term, temporary and intermittent construction-related activities would not contribute to additional sources of polluted runoff. Therefore, based on the analysis and information provided herein, including regulatory compliance as applicable, the project would result in a *less than significant impact*.

Mitigation Measures: None Required.

iv. Impede or redirect flood flows?

Less than Significant Impact: Although the Site is near the South Fork of the Tule River (river), it may temporarily alter the course of the river where the replacement and new pedestrian bridges would be located during the short-term, temporary and intermittent construction-related activities. Possible impediment or redirection of the river could occur depending upon the seasonal flow when construction-related activities occur. Also, the Project site is surrounded by existing development that would likely impede or direct flood flows away from the site. The nearest National Flood Hazard mapping by the Federal Emergency Management Agency does not include the Tule River Reservation area where the Project will be located. (Tule River Indian Reservation, 065066; 06107C1695E6 6/16/2009 at: https://hazards-fema.maps.arcgis.com/apps/webappviewer/index.html?id=8b0adb51996444d4879338b5529aa9cd&extent=-120.22581757761441,36.77078148069618,-119.60509003855205,37.04530192606378). However, the adjacent flood map panel shows that flooding would be limited to the main channel of the South Fork of the Tule River; it is reasonable to infer that based on the similar topography (that is, elevation, slope, and channel) where the river flows that potential flooding would be confined within the river channel which is outside of the Project area. As noted earlier, the pedestrian bridges will cross the river and could, depending upon seasonal flow, temporarily impede or redirect flows which would be minimized or avoided using typical construction practices specific to pedestrian bridge construction. Other components of the Project would not impede or redirect flood flows.

Therefore, based on the analysis and information provided herein, there would be a *less than significant impact*

Mitigation Measures: None Required.

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

No Impact: The Project is located inland and not near an ocean or large body of water; and as such, neither a tsunami nor seiche would affect the Project site. Therefore, based on the analysis and information provided herein, *no impact* would occur.

Mitigation Measures: None Required.

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

Less than Significant Impact: As noted earlier, the nature of the Project can be summarized as pedestrian safety enhancements and pedestrian bridges, sidewalks, and paths that would not conflict with or obstruct the implementation of any water quality control plan. The Tribe's groundwater supplies are drawn from existing groundwater sources and the South Fork of the Tule River which is then treated.

The Project would be subject to the requirements of the NPDES Stormwater Program and would be required to comply with a SWPPP. The SWPPP would identify all potential sources of pollution that could affect stormwater discharges from the Project Site and specify BMPs to prevent significant impacts related to stormwater runoff. Therefore, based on the analysis and information provided herein, and through regulatory compliance as applicable, the Project would result in a *less than significant impact*.

Mitigation Measures: None Required.

Mitigation Measures: See HYD-1 and HYD-2

Mitigation Measure HYD-1: Prior to the issuance of any construction/grading permit and/or the commencement of any clearing, grading, or excavation, the Applicant shall submit a Notice of Intent (NOI) for discharge from the Project Site to the California State Water Resources Control Board's Storm Water Permit Unit and submit a copy of this NOI to Tribal representatives, or designee. The Tribal representatives, or designee, shall review the noticing documentation prior to approval of the grading permit and Tribal representative, or designee, monitoring staff shall inspect the Project Site during construction for compliance.

Mitigation Measure HYD-2: The Applicant (Project proponent) shall require the building contractor to prepare and submit a Storm Water Pollution Prevention Plan (SWPPP) to the Project proponent 45 days prior to the start of work for approval. The contractor is responsible for understanding the State General Permit and instituting the SWPPP during construction. A SWPPP for site construction shall be developed prior to the initiation of grading and implemented for all construction activity on the Project Site in excess of one (1) acre, or where the area of disturbance is less than one acre but is part of the Project's plan of development that in total disturbs one or more acres. The SWPPP shall identify potential pollutant sources that may affect the quality of discharges to stormwater and shall include specific Best Management Practices (BMPs) to control the discharge of material from the site. The following BMPs methods shall include, but would not be limited to:

- Dust control measures to ensure success of all on-site activities to control fugitive dust;
- A routine monitoring plan to ensure success of all on-site erosion and sedimentation control measures;
- Provisional detention basins, straw bales, erosion control blankets, mulching, silt fencing, sand bagging, and soil stabilizers shall be used;
- Soil stockpiles and graded slopes shall be covered after two weeks of inactivity and 24 hours prior to and during extreme weather conditions; and,

- BMPs shall be strictly followed to prevent spills and discharges of pollutants on-site, such as material storage, trash disposal, construction entrances, etc.

Cumulative Impact: Less Than Significant with Mitigation

The geographic context used for the cumulative assessment of hydrology, drainage, flooding, and water quality is limited to the Tule River Reservation and the South Fork of the Tule River drainage basin. Also as noted earlier, the South Fork of the Tule River drains into Lake Success, therefore it does not directly drain into the Tule River watershed west of Schafer Dam. As previously noted, the nature of the Project (that is, pedestrian safety enhancements and pedestrian bridges, sidewalks, and paths), it is unlikely that these resources would be impacted beyond cessation of construction-related activities which will be short-term, temporary, and intermittent. Also, implementation of the earlier noted BMPs would reduce local and cumulative impacts to hydrology and drainage resulting in a less than significant impact. The water quality regulations implemented by the Central Valley RWQCB take a basin wide approach and consider water quality impairment in a regional context. Projects in these sub watersheds would implement structural and nonstructural source-control BMPs that reduce the potential for pollutants to enter runoff, and treatment control BMPs that remove pollutants from stormwater. Therefore, cumulative water quality impacts would be less than significant after compliance with these permit requirements, and impacts would not be cumulatively considerable.

The Central Valley RWQCB regulates discharges from runoff or leaching of irrigation water and/or stormwater from irrigated lands through the Irrigated Lands Regulatory Program. Even though the Project areas does not include any irrigated lands, any stormwater control program and storm drain improvements implemented by the Tule River Tribe would not directly or adversely impact the surrounding area. As noted earlier, the Project is not located within a flood zone and would therefore not result in a cumulative flood hazard. Therefore, based on the analysis and information provided herein, cumulative impacts from the Project to hydrology, drainage, and flooding would be less than significant.

XI.LAND USE AND PLANNING

Would the Project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less than Significant Impact	No Impact
a) Physically divide an established community?	☐	☐	☐	☑
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	☑

Environmental Setting

The Project is located entirely within the Tule River Reservation, generally along No. Reservation Road between Cow Mountain Road and Million Dollar Bridge. The Project is predominantly located in the Village area, which is the community and civic center of the Tule River Reservation and includes the Tribal Education Center, Gymnasium, Community Health Clinic, Tribal Council, Justice Center, Cow Mountain Daycare Center, Towanits Elementary School, and other Tribal service buildings. Residents access the Village area from the surrounding residences by walking, cycling, or vehicle use (See item 7. Project Description for additional details). In summary, the Project would result in two new pedestrian bridges (one to replace an the existing pedestrian swinging bridge and the other would be a new pedestrian bridge) to connect Cow Mountain Road and the No. Reservation Road corridor to the Justice Center, construct a new Class 1 trail, construct approximately 3,765 SF of concrete sidewalk construct seven (7) accessible curb ramps, install landscaping and irrigation for the length of the project, and other features as shown in Item 7. Project Description. The overall intent of the Project is to enhance pedestrian safety generally within the Village area and provide better pedestrian access to other Tribal uses south of the river.

Regulatory Setting

Federal

None that apply to the Project.

State

None that apply to the Project.

Local

Sustainable/Circulation Element for the Tule River Comprehensive Master Plan (STCETRCMP).

As noted in the STCETRCMP, "The Master Plan seeks to help consolidate the different developmental ideas and visions the Tribal has into one formal document. It is intended to formulate a concise methodology that allows for the community to reach toward a singular end goal that instills visual harmony on the Reservation. This document outlines the future steps and processes that go in to laying the foundation for the envisioned community outlined by the Tribal Council.

The Tule River Tribe's Master Plan will include an overall plan and four specific plans. The overall plan will include the Reservation, the specific plan areas and approximately 400,000 acres of surrounding land that the Tribe has historical and cultural stewardship over. The Master Plan includes Federal areas managed by the Bureau of Land Management and the US Fish and Wildfire Service. The main components of the Master Plan include the Housing Plan, the Specific Plans, this Sustainable Transportation Plan, an Infrastructure Plan, the Implementation Plan and a Financing Plan. The Master Plan will also include detailed development proposals for the Village area of the Reservation. The specific plans are intended to include more detail on proposed development within properties owned by the Tribe outside the Reservation. The Village, Specific Plans, and Road Safety Plan." (see STCETRCMP, page 31)

Tule River Road Safety Plan

Also as noted in the Sustainable/Circulation Element for the Tule River Comprehensive Master Plan, "The Tule River Indian Reservation has seen a high number of accidents over the last years within the Reservation. The Tribe in an effort to understand and address this issue received a grant from Caltrans to prepare a road safety plan. The goal of the Plan is to reduce highway fatalities and serious injuries on the roads within the Reservation. The Plan focuses on several different emphasis areas such as speed limits, and the relationship between motor vehicles, pedestrians, and cyclists. A safety plan is a coordinated plan that provides a comprehensive framework for reducing highway fatalities and serious injuries on Tribal roads and identifies a key safety needs and guides investment decisions towards strategies and countermeasures with the most potential to save lives and prevent injuries. The Federal Fixing American's Surface Transportation (FAST) Act calls for Tribes to develop, implement, evaluate and update a safety plan that identifies and analyzes highway safety problems and opportunities on all tribal roads.

The Tule River Tribe Road Safety Plan develops strategies to correct and improve hazardous road conditions at various locations on the Reservation. The Plan is a multi-year document that integrates the four E's of highway safety- engineering, enforcement, education, and emergency medical services (EMS)…The goal for the Road Safety Plan is to increase traffic safety and significantly improve the quality of life for Tribal members and the general public." (see STCETRCMP, page 35)

Discussion

a) Would the Project physically divide an established community?

No Impact: As noted earlier, the nature of the Project (that is, pedestrian safety enhancements and pedestrian bridges, sidewalks, and paths), would not physically divide an established community. This objective is consistent with the Road Safety Plan as noted earlier SCE. To reiterate, the goal for the Road Safety Plan is to increase traffic safety and significantly improve the quality of life for Tribal members and the general public. As such, the Project would complement the existing uses and would provide connectivity with adjacent Tribal governance uses, an elementary school, office/commercial uses, and other uses. Therefore, based on the analysis and information provided herein, *no impact* would occur.

Mitigation Measures: None Required.

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

No Impact: As previously noted, the nature of the Project is pedestrian safety enhancements using pedestrian bridges, sidewalks, paths, signage, etc. As such, the Project would not conflict with land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect. Rather, the Project would fulfill the objectives of many active transportation plans (ATP) such as the Tule River Indian Reservation ATP plan (December 2022); California Transportation Plan 2050 (CTP 2021); 2018 Sustainable Transportation/Circulation Element (ST/CE) of Tule River Comprehensive Master Plan, Tule River Tribal Transportation Safety Assessment (T2SA 2016); Tulare County Association of Governments (TCAG) Regional Active Transportation Plan ((RATP) 2016, 2017, 2020); 2018 and 2022 Tulare County Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). Therefore, based on the analysis and information provided herein, the Project would have *no impact.*

Mitigation Measures: None Required.

Mitigation Measures: None Required.

Based on the analysis and information provided herein, *no mitigation measures are required*.

Cumulative Impact: No Impact

The geographic context for the cumulative land use and planning is limited to the Tule River Reservation area. The land use analysis determined that the proposed Project would not divide an established community or conflict with established plans, policies, and regulations, in or outside the Tule River Reservation, adopted for the purpose of avoiding or mitigating an environmental effect. The Project would not create substantial land use impacts. As previously noted, the nature of the Project is pedestrian safety enhancements using pedestrian bridges, sidewalks, paths, signage, etc. Also as previously noted, the Project would fulfill the objectives of many active transportation plans (ATP) such as the Tule River Indian Reservation ATP plan (December 2022); California Transportation Plan 2050 (CTP 2021); 2018 Sustainable Transportation/Circulation Element (ST/CE) of Tule River Comprehensive Master Plan, Tule River Tribal Transportation Safety Assessment (T2SA 2016); Tulare County Association of Governments (TCAG) Regional Active Transportation Plan ((RATP) 2016, 2017, 2020); 2018 and 2022 Tulare County Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). Therefore, the proposed Project would provide a benefit rather than result in an adverse contribution to cumulative impacts related to land use changes and would result in *no cumulative impact*.

XII. MINERAL RESOURCES

Would the Project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less than Significant Impact	No Impact
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☑
b) Result in the loss of availability of a locally – important mineral resource recovery Site delineated on a local general plan, specific plan or other lands use plan?	☐	☐	☐	☑

Environmental Setting

The California Department of Conservation (DOC), Mining Division, indicates that there are no mineral resource zones within the Tule River Reservation area and there is no mineral extraction occurring on or adjacent to the proposed Project site. (see DOC's website at: https://www.arcgis.com/apps/mapviewer/index.html?url=https://gis.conservation.ca.gov/server/rest/services/MOL/MOLMines/MapServer&source=sd).

Regulatory Setting

Federal

None that apply to the Project.

State

None that Apply to the Project.

Local

None that Apply to the Project.

Discussion

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

No Impact: The Project site has no known mineral resources that would be of value to the region and the state's residents. The Project site is not designated as an important mineral resource recovery site as determined by the DOC. Also, as previously noted, the nature of the Project can be summarized as pedestrian safety enhancements using pedestrian bridges, sidewalks, paths, signage, etc. Therefore, based on the analysis and information provided herein, the Project would not result in the loss or impede the mining of regionally or locally important mineral resources. There would be *no impact*.

Mitigation Measures: None Required.

b) Would the Project result in the loss of availability of a locally – important mineral resource recovery Site delineated on a local general plan, specific plan or other lands use plan?

No Impact: As noted earlier at Item a) there are no known mineral resources that would be important to the region, and the Project site is not designated as an important mineral resource as determined by the DOC. As previously noted, the nature of the Project is pedestrian safety enhancements using pedestrian bridges, sidewalks, paths, signage, etc. Therefore, the proposed Project would not result in the loss of availability of known regionally or locally important mineral resources. There is *no impact.*

Mitigation Measures: None Required.

Mitigation Measures: None Required.

Based on the analysis and information provided herein, *no mitigation measures are required*.

Cumulative Impact: No Impact

As noted earlier, the DOC has determined that the Tule River Reservation area does not contain any important mineral resources or mining operations. As the City does not contain any known mineral resources, the General Plan does not include any Goals or policies applicable to mineral resources. As previously noted, the nature of the Project is pedestrian safety enhancements using pedestrian bridges, sidewalks, paths, signage, etc. Therefore, based on the analysis and information provided herein, the Project would not result in the loss or impede the mining of regionally or locally important mineral resources. There would be *no cumulative impact*.

XIII.NOISE

Would the Project result in:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less than Significant Impact	No Impact
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☑	☐
b) Generation of excessive ground-borne vibration or 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 public airport or public use airport, would the Project expose people residing or working in the Project area to excessive noise levels?	☐	☐	☑	☐

Environmental Setting

The predominant existing noise sources in the vicinity of the Project Site are vehicles on adjacent streets. The Project site is greater than two (2) miles from the nearest airport (Porterville Municipal Airport) and is not within the vicinity of a private airstrip or an airport land use plan.

Noise is often described as an unwanted sound, while Sound is the variation in air pressure that the human ear can detect. If the pressure variations occur at least 20 times per second, they can be detected by the human ear. The number of pressure variations per second is called the frequency of sound. The frequency is expressed as cycles per second, called Hertz (Hz).

Ambient noise is the "background" noise of an environment. Existing ambient noise levels proximate to the Project site are primarily due to traffic. Construction activities usually result in an increase in sound above ambient noise levels.

Vibration is sound radiated through the ground. Vibration can result from a source (e.g., train operations, motor vehicles, machinery equipment, etc.), causing the adjacent ground to move,

creating vibration waves that propagate through the soil to the foundations of nearby buildings. This effect is a ground-borne vibration.

TERMINOLOGY

To understand noise, it is important to understand how noise is evaluated by providing the following terminology. The following are brief definitions of terminology used in this section:

- Sound. A disturbance created by a vibrating object, which when transmitted by pressure waves through a medium such as air, is capable of being detected by the human ear or a microphone.
- Noise. Sound that is loud, unpleasant, unexpected, or otherwise undesirable.
- Decibel (dB). A measure of sound on a logarithmic scale.
- A-Weighted Decibel (dBA). An overall frequency-weighted sound level in decibels that approximates the frequency response of the human ear.
- Equivalent Continuous Noise Level (Leq). The mean of the noise level, energy averaged over the measurement period.
- Lmax. The maximum noise level during a measurement period.
- Statistical Sound Level (Ln). The sound level that is exceeded "n" percent of time during a given sample period. For example, the L50 level is the statistical indicator of the time-varying noise signal that is exceeded 50 percent of the time (during each sampling period). This is also called the "median sound level." The L10 level, likewise, is the value that is exceeded 10 percent of the time (i.e., near the maximum) and this is often known as the "intrusive sound level." The L90 is the sound level exceeded 90 percent of the time and is often considered the "effective background level" or "residual noise level."
- Day-Night Sound Level (Ldn or DNL). The energy-average of the A-weighted sound levels occurring during a 24-hour period, with 10 dB added to the sound levels occurring during the period from 10:00 p.m. to 7:00 a.m.
- Community Noise Equivalent Level (CNEL). The energy-average of the A-weighted sound levels occurring during a 24-hour period, with 5 dB added to the levels occurring during the period from 7:00 p.m. to 10:00 p.m. and 10 dB added to the sound levels occurring during the period from 10:00 p.m. to 7:00 a.m. Note: For general community/environmental noise, CNEL and Ldn values rarely differ by more than 1 dB. As a matter of practice, Ldn and CNEL values are considered to be equivalent/interchangeable.
- Peak Particle Velocity (PPV). The peak rate of speed at which soil particles move (e.g., inches per second) due to ground vibration.
- Noise-Sensitive Receptor. Noise- and vibration-sensitive receptors include land uses where quiet environments are necessary for enjoyment and public health and safety. Residences, schools, motels and hotels, libraries, religious institutions, hospitals, and nursing homes are examples. As such, these have more stringent noise level allowances

than most commercial or agricultural uses that are not subject to impacts such as sleep disturbance.

SOUND FUNDAMENTALS

Sound is a pressure wave transmitted through the air. It is described in terms of loudness or amplitude (measured in decibels), frequency or pitch (measured in Hertz [Hz] or cycles per second), and duration (measured in seconds or minutes). The standard unit of measurement of the loudness of sound is the decibel (dB). Changes of 1 to 3 dB are detectable under quiet, controlled conditions and changes of less than 1 dBA are usually indiscernible. A 3 dB change in noise levels is considered the minimum change that is detectable with human hearing in outside environments. A change of 5 dB is readily discernable to most people in an exterior environment whereas a 10 dBA change is perceived as a doubling (or halving) of the sound.

The human ear is not equally sensitive to all frequencies. Sound waves below 16 Hz are not heard at all and are "felt" more as a vibration. Similarly, while people with extremely sensitive hearing can hear sounds as high as 20,000 Hz, most people cannot hear above 15,000 Hz. In all cases, hearing acuity falls off rapidly above about 10,000 Hz and below about 200 Hz. Since the human ear is not equally sensitive to sound at all frequencies, a special frequency dependent rating scale is usually used to relate noise to human sensitivity. The A-weighted decibel scale (dBA) performs this compensation by weighting frequencies in a manner approximating the sensitivity of the human ear.

Noise is defined as unwanted sound and is known to have several adverse effects on people, including hearing loss, speech and sleep interference, physiological responses, and annoyance. Based on these known adverse effects, the federal government, the State of California, and many local governments have established criteria to protect public health and safety and to prevent disruption of certain human activities.

Sound Measurement

Sound pressure is measured through the A-weighted measure to correct for the relative frequency response of the human ear. That is, an A-weighted noise level de-emphasizes low and very high frequencies of sound similar to the human ear's de-emphasis of these frequencies. Unlike linear units such as inches or pounds, decibels are measured on a logarithmic scale, representing points on a sharply rising curve. On a logarithmic scale, an increase of 10 dB is 10 times more intense than 1 dB, while 20 dB is 100 times more intense, and 30 dB is 1,000 times more intense. The decibel system of measuring sound gives a rough connection between the physical intensity of sound and its perceived loudness to the human ear. Ambient sounds generally range from 30 dBA (very quiet) to 100 dBA (very loud).

Sound levels are generated from a source and their decibel level decreases as the distance from that source increases. Sound dissipates exponentially with distance from the noise

source. This phenomenon is known as “spreading loss.” For a single point source, sound levels decrease by approximately 6 dB for each doubling of distance from the source. This drop-off rate is appropriate for noise generated by on-site operations from stationary equipment or activity at a project site. If noise is produced by a line source, such as highway traffic, the sound decreases by 3 dB for each doubling of distance in a hard site environment. Line source noise in a relatively flat environment with absorptive vegetation decreases by 4.5 dB for each doubling of distance.

Time variation in noise exposure is typically expressed in terms of a steady-state energy level equal to the energy content of the time varying period (called Leq), or alternately, as a statistical description of the sound level that is exceeded over some fraction of a given observation period. For example, the L50 noise level represents the noise level that is exceeded 50 percent of the time. Half the time the noise level exceeds this level and half the time the noise level is less than this level. This level is also representative of the level that is exceeded 30 minutes in an hour. Similarly, the L2, L8 and L25 values represent the noise levels that are exceeded 2, 8, and 25 percent of the time, or 1, 5, and 15 minutes per hour. These “Ln” values are typically used to demonstrate compliance for stationary noise sources with a city’s noise ordinance, as discussed subsequently.

Psychological and Physiological Effects of Noise

Physical damage to human hearing begins at prolonged exposure to noise levels higher than 85 dBA. Exposure to high noise levels affects our entire system, with prolonged noise exposure in excess of 75 dBA increasing body tensions, and thereby affecting blood pressure, functions of the heart and the nervous system. In comparison, extended periods of noise exposure above 90 dBA could result in permanent hearing damage. When the noise level reaches 120 dBA, a tickling sensation occurs in the human ear even with short-term exposure. This level of noise is called the threshold of feeling. As the sound reaches 140 dBA, the tickling sensation is replaced by the feeling of pain in the ear. Typical Noise Levels, shows typical noise levels from familiar noise sources in dBA as follows (as excerpted from the Tulare County General Plan Background Report Table 8-9 Typical Noise Levels, page 8-51):

- Common Indoor Activities Onset of physical discomfort 120 dBA;
- Jet Flyover at 1,000 feet 100 dBA;
- Gas Lawn Mower at three feet 90 dBA;
- Diesel Truck at 15 meters (50 feet); Food Blender at 1 meter (3 feet); Garbage Disposal at 1 meter (3 feet) 80 dBA;
- Noisy Urban Area Daytime; Vacuum Cleaner at 3 meters (10 feet); Commercial Area; Normal speech at 1 meter (3 feet) 70 dBA;
- Heavy Traffic at 90 meters (300) feet; Large Business Office 60 dBA;
- Quiet Urban Daytime, Dishwasher next room 50 dBA;
- Quiet Urban Nighttime Theater; Large Conference Room (background) 40 dBA;
- Quiet Suburban Nighttime Theater; Large Conference Room (background) 30 dBA;

- Quiet Rural Nighttime, Library; Bedroom at Night; Concert Hall (background) 20 dBA;
- Broadcast/Recording Studio 10 dBA;
- Lowest Threshold of Human Hearing 0 dBA

VIBRATION FUNDAMENTALS

Vibration is an oscillating motion. Like noise, vibration is transmitted in waves, but in this case through earth or solid objects. Unlike noise, vibration is typically felt rather than heard.

Vibration can be either natural as in the form of earthquakes, volcanic eruptions, or landslides, or human made as from explosions, heavy machinery, or trains. Both natural and human-made vibration may be continuous such as from operating machinery, or impulsive as from an explosion.

As with noise, vibration can be described by both its amplitude and frequency. Amplitude may be characterized in three ways including displacement, velocity, and acceleration. Particle displacement is a measure of the distance that a vibrated particle travels from its original position. For the purposes of soil displacement it is typically measured in inches or millimeters. Particle velocity is the rate of speed at which soil particles move in inches per second or millimeters per second. Particle acceleration is the rate of change in velocity with respect to time and is measured in inches per second or millimeters per second. Typically, particle velocity (measured in inches or millimeters per second) and/or acceleration (measured in gravities) are used to describe vibration. Typical human reaction to various levels of peak particle velocity, human reaction, and effects on buildings are summarized as follows:

- 0.006–0.019 - Threshold of perception, possibility of intrusion Vibrations unlikely to cause damage of any type.
- 0.08 - Vibrations readily perceptible, Recommended upper level of vibration to which ruins and ancient monuments should be subjected.
- 0.10 - Level at which continuous vibration begins to annoy people, Virtually no risk of “architectural” (i.e., not structural) damage to normal buildings.
- 0.20 - Vibrations annoying to people in buildings, Threshold at which there is a risk to “architectural” damage to normal dwelling – houses with plastered walls and ceilings.
- 0.4–0.6 Vibrations considered unpleasant by people subjected to continuous vibrations and unacceptable to some people walking on bridges, Vibrations at a greater level than normally expected from traffic, but would cause “architectural” damage and possibly minor structural damage.

Vibrations also vary in frequency and this affects perception. Typical construction vibrations fall in the 10 to 30 Hz range and usually occur around 15 Hz. Traffic vibrations exhibit a similar range of frequencies; however, due to their suspension systems, buses often generate frequencies around 3 Hz at high vehicle speeds. It is less common, but possible, to measure traffic frequencies above 30 Hz. The way in which vibration is transmitted through the earth is

called propagation. As vibration waves propagate from a source, the energy is spread over an ever-increasing area such that the energy level striking a given point is reduced with the distance from the energy source. This geometric spreading loss is inversely proportional to the square of the distance. Wave energy is also reduced with distance as a result of material damping in the form of internal friction, soil layering, and void spaces. The amount of attenuation provided by material damping varies with soil type and condition as well as the frequency of the wave.

EXISTING CONDITIONS

Primary noise sources in the Project Area is limited to traffic on local roadways (for example, North and South Reservation Roads), The Project site is located adjacent to a natural sound source (rather than a noise source which is unwanted sound) from the South Fork of the Tule River.

Noise-Sensitive Receptors

As noted earlier, certain land uses, such as residences, schools, and hospitals, are particularly sensitive to noise and vibration. Noise sensitive receptors within the Project Area include residences, Tribal Governance uses, an elementary school, a daycare center, recreational areas, and local commercial uses of the Village area. These uses are regarded as sensitive because they are where citizens most frequently engage in activities that are likely to be disturbed by noise, such as reading, studying, sleeping, resting, or otherwise engaging in quiet or passive recreation. Commercial and industrial uses are not particularly sensitive to noise or vibration.

Regulatory Setting

Federal

United States Environmental Protection Agency (USEPA)

The USEPA has identified the relationship between noise levels and human response. The USEPA has determined that over a 24 hour period, a Leq of 70 dBA will result in some hearing loss. Interference with activity and annoyance will not occur if exterior levels are maintained at a Leq of 55 dBA and interior levels at or below 45 dBA. While these levels are relevant for planning and design and useful for informational purposes, they are not land use planning criteria because they do not consider economic cost, technical feasibility, or the needs of the community. The USEPA also has set 55 dBA Ldn as the basic goal for exterior residential noise intrusion. However, other federal agencies, in consideration of their own program requirements and goals, as well as difficulty of actually achieving a goal of 55 dBA Ldn, have settled on the 65 dBA Ldn level as their standard. At 65 dBA Ldn, activity interference is kept to a minimum, and annoyance levels are still low. It is also a level that can realistically be achieved.

Occupational Health and Safety Administration

The federal government regulates occupational noise exposure common in the workplace through the Occupational Health and Safety Administration (OSHA) under the USEPA. Such limitations would apply to the operation of construction equipment and could also apply to any proposed industrial land uses. Noise exposure of this type is dependent on work conditions and is addressed through a facility's Health and Safety Plan, as required under OSHA, and is therefore not addressed further in this analysis.

State

State General Plan Guidelines

The State of California, through its General Plan Guidelines, discusses how ambient noise should influence land use and development decisions and includes a table of normally acceptable, conditionally acceptable, normally unacceptable, and clearly unacceptable uses at different noise levels. These suggested noise and land use compatibility standards provide local governments with a basis for setting limits appropriate to their jurisdiction.

California Building Code

The State of California provides a minimum standard for building design through Title 24 of the California Code of Regulations, commonly referred to as the California Building Cod" (CBC). The CBC is in Part 2 of Title 24. The CBC is updated on a three-year cycle. It is effective statewide, but a local jurisdiction may adopt more restrictive standards based on local conditions under specific amendment rules prescribed by the State Building Standards Commission. The CBC Volume 1, Chapter 12, Interior Environment, Section 1207.11.2, Allowable Interior Noise Levels, requires that interior noise levels attributable to exterior sources shall not exceed 45 dBA in any habitable room. The noise metric is evaluated as either the Ldn or the CNEL, consistent with the noise element of the local general plan.

California Building Code: CALGreen

The California Building Standards Commission adopted the California Green Building Standards Code, also known as CALGreen. As part of the CBC, CALGreen is in Part 11 of Title 24. The State of California's noise insulation standards for nonresidential uses are codified in CALGreen. The CALGreen noise standards are applied to new or renovation construction projects in California to control interior noise levels resulting from exterior noise sources. Development projects may use either the prescriptive method (CALGreen Section 5.507.4.1) or the performance method (CALGreen Section 5.507.4.2) to show compliance. Under the prescriptive method, a project must demonstrate transmission loss ratings for the wall and roof-ceiling assemblies and exterior windows when located within a noise environment of 65

dBA CNEL or higher. Under the performance method, a project must demonstrate that interior noise levels do not exceed 50 dBA Leq(1hr).

Local

None that apply to the Project.

Discussion

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

Less Than Significant Impact: As previously noted, the nature of the Project is pedestrian safety enhancements using pedestrian bridges, sidewalks, paths, signage, etc. As such, Project construction is anticipated to last approximately 12 months and will involve temporary, short-term, and intermittent noise sources. The Project could result in two types of temporary noise impacts during construction: (1) the transport of workers and movement of materials to and from the site could incrementally increase noise levels along local access roads; and (2) noise would be generated from activities related to site preparation, grading, and/or physical construction. Construction is performed in distinct steps, each of which has its own mix of equipment, and consequently, its own noise characteristics. Table 3-8, Construction Equipment Noise Emission Levels, lists typical construction equipment noise levels recommended for noise-impact assessments, based on a distance of 50 feet between the equipment and noise receptor. The average noise levels generated by construction equipment that could be used in the proposed Project are shown below.

Table 3-8: Noise Equipment Levels

Type of Equipment	dBA at 50 feet
Air Compressors	81
Excavators	81
Cranes	83
Forklifts	75
Generators	81
Pavers	89
Rollers	74
Dozers	85
Loaders	85
Backhoes	80
Graders	85
Scrapers	89

Source: Federal Highway Administration Construction Noise Handbook.

Typically for construction-related activities, construction equipment and other noise-generating activities are limited to daytime hours from Monday through Friday. and typically do not occur before 7:00 a.m. or after 9:00 p.m. on any day (except Saturday or Sunday, or before 8:00 a.m. or after 5:00 p.m. on Saturday or Sunday).

Further, it is noted that as the project would be funded through Caltrans, the Project must comply with Caltrans' noise minimization standards/requirements. Caltrans' requirements are not mitigation measures as they would be required regardless of magnitude of impacts. Simply stated, if Caltrans requires a specific noise minimization practice during construction-related activities, it must be performed to their satisfaction.

Because noise generated from construction-related activities would be short-term, temporary, and intermittent, construction-related activities. Noise minimization could be included in construction-related contracts to limit noise impacts. Therefore, based on the analysis and information provided herein, the impact would be *less than significant.*

Mitigation Measures: None Required.

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

Less Than Significant Impact: Projects that use vibration-intensive construction activities—such as pile drivers, jackhammers, and vibratory rollers—near sensitive receptors must be evaluated for potential vibration impacts. As previously noted, the nature of the Project is pedestrian safety enhancements using pedestrian bridges, sidewalks, paths, signage, etc. As such, the Project would not utilize this type of equipment during construction-related activities, and as such, the Project would not generate excessive ground-borne vibration or ground-borne noise levels. In the event that this type of equipment is used, the duration would be short-term, temporary, and intermittent. Therefore, based on the analysis and information provided herein, impacts would be *less than significant*.

Mitigation Measures: None Required.

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 public airport or public use airport, would the Project expose people residing or working in the Project area to excessive noise levels?

No Impact: The Project Site is greater than two miles from Porterville Municipal Airport and is not within the airport land use plan for that airport nor is the Project Site within an elevated noise contour. As such, the Project would not expose people residing or working in the Project

area to excessive noise levels. Therefore, based on the analysis and information provided herein, impacts would result in *no impact*.

Mitigation Measures: None Required.

Mitigation Measures: None Required.

Based on the analysis and information provided herein, *mitigation measures would not be required*.

Cumulative Impact: Less than Significant

The cumulative area is limited to the Tule River Reservation and Project areas. Given the nature of the Project, that is, pedestrian safety enhancements using pedestrian bridges, sidewalks, paths, signage, etc.; the short-term, temporary, and intermittent construction-related activities and no change to current vehicle-generated noise (as the Project is intended to encourage walking and cycling rather than vehicle usage), there would no significant noise or vibration related impacts. The analysis of the proposed project, discussed above, addresses cumulative impacts with regard to noise, ground borne noise, and vibration. Although multiple simultaneous nearby noise sources may, in combination, result in higher overall noise levels, this effect is captured and accounted for by the ambient noise level metrics that form the basis of the thresholds of significance for noise analysis. Any measurement of sound or ambient noise, whether for the purpose of evaluating land use compatibility, establishing compliance with exterior and interior noise standards, or determining point-source violations of a noise threshold would incorporate noise from all other nearby *perceptible sources* (emphasis added). Additionally, although noise attenuation (that is, the reduction of sound intensity as it travels through a space) is influenced by a variety of topographical, meteorological, and other factors, noise levels decrease rapidly with distance, and vibration impacts decrease even more rapidly. As noted earlier, construction-related activities (which would be the largest contributor to noise and vibration) are anticipated to occur during the short-term, temporarily, and intermittently, and will cease upon completion of construction-related activities. As such, the Project's impact would be *less than significant*.

XIV. POPULATION AND HOUSING

Would the Project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less than Significant Impact	No Impact
a) Induce substantial unplanned population growth in an area, either directly (for example, by 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?	☐	☐	☐	☑

Environmental Setting

According to the U.S. Census Bureau (2023), *American Community Survey 5-year estimates*, the Tule River Reservation had a total population of 913 and 291 housing units. The Tribe's total enrollment is estimated at 1,857 (see: https://censusreporter.org/profiles/25200US4300R-tule-river-reservation/).

However, the Tule River Indian Tribe's May 20, 2024 "Request for Proposal for the Master Planning Service" Project indicated the "The Tribe has approximately 1,995 members, with approximately 1,614 that live on the Reservation." (see page 1). This estimate and the U.S. Census Bureau 2023 *American Community Survey 5-year estimates* vary by 138 total enrollment members but by 710 members living within Reservation lands. Regardless of the discrepancy of population estimates, the differences would provide a benefit in regard to active transportation and would not affect the ability of the Project to move forward.

Regulatory Setting

Federal

None that apply to the Project.

State

California Housing Element Law (California Government Code Sections 65580 through 65589.8) includes provisions related to the requirements for housing elements of local government General Plans. Among these requirements, some of the necessary parts include an assessment of housing needs and an inventory of resources and constraints relevant to the meeting of these needs. Additionally, to ensure that counties and cities recognize their responsibilities in contributing to the attainment of the State housing goals, the Government Code calls for local jurisdictions to plan for, and allow the construction of, a share of the region's projected housing needs. However, as the Project does not include any housing, Housing Element Law does not apply.

Regional

None that apply to the Project.

Local

As noted in the Sustainable Transportation Circulation Element for the Tule River Comprehensive Master Plan (STCETRCMP), "Tule River Tribe Housing Plan Currently, the most pressing issue facing the Tribe is a lack of affordable housing for enrolled members of the Tribe. This element of the planning program identifies the current housing situation on the Reservation, explores opportunities for new housing, identifies constraints and growing needs, and ultimately provides a construction plan for new and replacement units. The Housing Plan has been prepared to assist in the preparation of the Master Plan, the Specific Plans and the Sustainable Transport Plan." (see STCETRCMP, page 6). However, as the Project does not include a housing component, the Tule River Tribe Housing Plan does not apply to the Project.

Discussion

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

Less Than Significant Impact: Given the nature of the Project, that is, pedestrian safety enhancements using pedestrian bridges, sidewalks, paths, signage, etc.; the Project would not induce substantial unplanned population growth in an area, either directly or indirectly. As such, the Project would not impact housing or population. Therefore, based on the analysis and information provided herein, there would be *no impact*.

Mitigation Measures: None Required.

Based on the analysis and information provided herein, *no mitigation measures are required.*

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

No Impact: The nature of the Project can be summarized as pedestrian safety enhancements using pedestrian bridges, sidewalks, paths, signage, etc.). As such, the Project would not involve the removal of existing residences and would not displace any people. Therefore, based on the analysis and information provided herein, *no impact* would occur.

Mitigation Measures: None Required.

Mitigation Measures: None Required.

Based on the analysis and information provided herein, *no mitigation measures are required.*

Cumulative Impact: No Impact

The cumulative area is limited to the Tule River Reservation. As noted earlier, the nature of the Project can be summarized as pedestrian safety enhancements using pedestrian bridges, sidewalks, paths, signage, etc.). As described in impact discussions Item a) and Item b), implementation of the Project would not induce a substantial amount of unplanned population growth or growth for which inadequate planning has occurred, or displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere. Rather, the Project would provide connectivity to existing Tribal Governance uses, commercial uses, residential and other uses within the Village area where the Project will be located. As noted earlier, the Project would fulfill the objectives of several Active Transportation Plans by providing walkable and cycling options that include enhanced safety features. Therefore, based on the analysis and information provided herein, the Project would not result in a cumulatively considerable impact to population and housing, and there would be *no cumulative impact*.

XV. PUBLIC SERVICES

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

Environmental Setting

Fire Protection

The Project site served by the Tule River Fire Department (TRFD), which will continue to provide fire protection services upon development of the Project. The Project would be required to adhere to all fire safety regulations and compliance with building codes, to ensure adequate fire protection during Project construction-related activities.

TRFD Staffing and Facilities

As described in the TRFD website, "Current Staffing includes 14 full time fire personnel: One Fire Chief, One Battalion Chief (B.C.), Three Fire Captains (F.C.), Three Fire Apparatus Engineers (F.A.E.) and Six Firefighters (F.F.). Each trained as a Firefighter and Emergency Medical Technician. Three shifts (A, B, & C) working a 48/96 schedule include, four personnel are on duty staffing a 2011 Pierce Arrow XT PUC Type 1 Engine, Ford F-550 Rosenbauer Type IV Patrol, and a 2010 Ford F-350 E-Series Basic Life Support Ambulance serving the Tule River Indian Reservation 24 hours a day, seven days a week, 365 days a year.

Tule River Fire Department Wildland branch was created 12 years ago. Staffing includes Four full time positions: One Fire Management Officer, One Assistant Fire Management Officer, Two Wildland Fire Captains; seasonal employment includes, five to seven personnel seven days a week, eight hours per day during the wildland fire season. During the fire season wildland personnel staff two fire engines; one Pierce type III and one Ford F-550 type VI. They are considered a national resource and respond to wildland fires on the reservation as well as within the United States." (see: https://tulerivertribe-nsn.gov/departments/fire-deparment/)

Police Protection

Law enforcement services (police protection services) are and would continue to be provided to the Project site by the Tule River Tribal Police Department (TRTPD). According to information provided in the Tule River Tribe Department of Public safety website, "The TRTPD Police Officer/High Country Ranger division totals five officers; all have Special Law Enforcement Commission (SLEC) through the Bureau of Indian Affairs (BIA) recognizing them as federal police officers. We recently have implemented a community oriented style of policing that allows officers to work with community and remain proactive in patrolling and establishing solid relationships with departments that deal directly with the youth. We work collaboratively with the Tulare County Sheriff's Office (TCSO) as well as other municipal/state agencies/federal agencies i.e. (Probation/Parole, California Fish and Game, US Forestry). During the summer months we have established and maintained a great relationship with the United States Army National Guard (USANG) who supports the TRTPD with air surveillance and foot patrols of reported marijuana cultivation, along with other state task force groups that support eradication/reclamation of the Tule River Indian Reservation."
(see: https://tulerivertribe-nsn.gov/dps-2/)

The TRTPD also includes a Community Service Officer division. According to information provided in the Tule River Tribe Department of Public safety website, "The TRTPD Community Service Officer (CSO) division totals five Officers that assist and respond to calls with TRTPD Sworn Police Officers. They rotate monthly shifts at the TRTPD high country access post that greatly assist in monitoring traffic/personnel entering the mountainous area. The CSO division also assists Eagle Mountain Casino (EMC) events as well as community events as needed. Most have their PC 832 (laws of arrest) training as well as specialized training through the Federal Law Enforcement Training Center (F.L.E.T.C.) pertaining to courtroom duties." (see: https://tulerivertribe-nsn.gov/dps-2/)

Schools

As indicated in the Tule River Reservation Website, "Located on the Tule River Reservation, Towanits School has grown one-grade level each year and became a full K-5 elementary school starting the 2017/18 academic year. Towanits School operates a traditional school year (Mid-August and the end of the first week in June) operating M-F from 8:00 am – 2:30 pm for

kindergarten and from 8:00 am – 3:00 pm for grades 1-5. Towanits School's winter, spring, and summer recesses are aligned with those of Porterville Schools to ensure families/students have common days off." (see: https://tulerivertribe-nsn.gov/towanits/. Students of all grade levels attend Porterville Unified School District schools.

Libraries

There are no libraries located within the Tule River Reservation.

Parks and Recreation

The Tribe provides recreational opportunities such as the softball field, Tule Gym, and Tule River Recreation Department in the Village area), and nearby Painted Rock Campground. Also, the Hyder Ranch Sports Complex is currently being renovated (Tribe's July 2025 News Vol. 06 Newsletter, page 20 at: https://tulerivertribe-nsn.gov/news/#)

However, it is noted that the Project does not include a parks and recreation component other than the trail.

Regulatory Setting

Federal

None that apply to the Project.

State

None that apply to the Project.

Regional and Local

Tulare County Multi-Jurisdictional Local Hazard Mitigation Plan (MJ-LHMP)

In summary the Tule River Tribe is a participant in the MJ-LMHP; see detailed discussion at Item XX. Wildfire.

Discussion

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

i. Fire protection?

Less Than Significant Impact: As previously noted, the nature of the Project can be summarized as pedestrian safety enhancements and pedestrian bridges, sidewalks, and paths that would not result in a substantial impact to fire protection facilities or capabilities. Also noted earlier, the Project site is served by the Tule River Fire Department (TRFD), which will continue to provide fire protection services upon development of the Project. Therefore, based on the analysis and information provided herein, the impact would be *less than significant.*

Mitigation Measures: None Required.

ii. Police protection?

Less Than Significant Impact: As previously noted, the nature of the Project can be summarized as pedestrian safety enhancements and pedestrian bridges, sidewalks, and paths that would not result in a substantial impact to police protection facilities or capabilities. Also noted earlier, the Project site is served by the Tule River Tribal Police Department (TRTPD), which will continue to provide police protection services upon development of the Project Therefore, based on the analysis and information provided herein, the impact would be *less than significant.*

Mitigation Measures: None Required.

iii. Schools?

No Impact: As previously noted, the nature of the Project can be summarized as pedestrian safety enhancements and pedestrian bridges, sidewalks, and paths that encourage active walking and cycling. As such, the Project would not generate additional school-aged students and would not result to an increase in enrollment at local schools.

Therefore, based on the analysis and information provided herein, there would be *no impact.*

Mitigation Measures: None Required.

iv. Parks?

No Impact: The nature of the Project can be summarized as pedestrian safety enhancements and pedestrian bridges, sidewalks, and paths that encourage active walking and cycling. As such, it is unlikely that the Project would not generate additional population increases that would result in the need for additional park land.

Therefore, based on the analysis and information herein, the Project would result in *no impact*.

Mitigation Measures: None Required.

v. Other public facilities?

No Impact: The nature of the Project can be summarized as pedestrian safety enhancements and pedestrian bridges, sidewalks, and paths that encourage active walking and cycling. As the Project would not result in new residents or a population increase on or near the Project Site, it can reasonably be inferred that the Project would result in no increased demand of other public facilities including schools, parks, or other recreation facilities. Therefore, based on the analysis and information provided herein, impacts would be *less than significant*.

Mitigation Measures: None Required.

Mitigation Measures: None Required.

Based on the analysis and information provided herein, *no mitigation measures are required.*

Cumulative Impact: Less than Significant

The cumulative area is limited to the Tule River Reservation. The nature of the Project can be summarized as pedestrian safety enhancements and pedestrian bridges, sidewalks, and paths that encourage active walking and cycling. Regarding schools, parks, or other public facilities, as noted earlier, the nature of the Project would not result in a population increase that could subsequently result in a change to or demand for new (or expanded) facilities of schools, parks or other public facilities. There would be no cumulative to these resources. Regarding fire and police protection services, both would continue to provide these services regardless of the Project and would not be substantially or adversely affected upon Project completion. Hypothetically, it is possible that a construction-related accident/incident may occur; however, both the TRFD and the TRPD have the training, equipment, and personnel to adequately respond in a timely manner. Therefore, the Project would not result in a cumulatively considerable impact to fire and police protection services. As such, based on the analysis and information provided herein, *cumulative impacts would be less than significant*.

XVI.RECREATION

Would the Project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less than Significant Impact	No Impact
a) Would the Project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☑
b) Does the Project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☑

Environmental Setting

See discussion at resource XIV Public Services.

Regulatory Setting

See discussion at resource XIV Public Services.

Discussion

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

No Impact: The nature of the Project can be summarized as pedestrian safety enhancements and pedestrian bridges, sidewalks, and paths that encourage active walking and cycling. It would not include any park or recreational facilities. As such, it precludes the potential for increases in population that are typically the result of development of residences and would not increase the use of existing neighborhood and regional parks to the extent that substantial physical deterioration would occur or be accelerated. Also, see Item XV a.iv.). Therefore, based on the analysis and information provided herein, there would be *no impact.*

Mitigation Measures: None Required.

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

No Impact: The nature of the Project can be summarized as pedestrian safety enhancements and pedestrian bridges, sidewalks, and paths that encourage active walking and cycling. As such, it precludes the potential for increases in population that are typically the result of development of residences. The Project would not include any recreational facilities or require the construction or expansion of any recreational facilities which might have an adverse physical effect on the environment. Also, see Item XV a.iv.). Therefore, based on the analysis and information provided herein, there would be *no impact.*

Mitigation Measures: None Required.

Mitigation Measures: None Required.

Based on the analysis and information provided herein, *no mitigation measures are required*.

Cumulative Impact: No Impact.

The cumulative area is limited to the Tule River Reservation. As noted earlier, the nature of the Project can be summarized as pedestrian safety enhancements and pedestrian bridges, sidewalks, and paths that encourage active walking and cycling. The nature of the Project would not result in a population increase that could subsequently increase the use of existing neighborhood and regional parks to the extent that substantial physical deterioration would occur or be accelerated, nor would it include any recreational facilities or require the construction or expansion of any recreational facilities which might have an adverse physical effect on the environment. Therefore, based on the analysis and information provided herein, the Project would not result in a cumulatively considerable impact to park and recreational facilities and there would be *no cumulative impacts* associated with the Project.

XVII. TRANSPORTATION

Would the Project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less than Significant Impact	No Impact
a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	☐	☐	☐	☑
b) Conflict or be inconsistent with the 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?	☐	☐	☐	☑

As noted earlier, this IS/MND will also rely on information (e.g., plans, programs, policies, studies, statistics, etc.) of previously completed (and in some instances adopted) documents such as: Tule River Indian Reservation ATP plan (December 2022); California Transportation Plan 2050 (CTP 2021); 2018 Sustainable Transportation/Circulation Element (ST/CE) for the Tule River Comprehensive Master Plan, Tule River Tribal Transportation Safety Assessment (T2SA 2016); Tulare County Association of Governments (TCAG) Regional Active Transportation Plan ((RATP) 2016, 2017, 2020); 2018 and 2022 Tulare County Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS);

Environmental Setting

The Project is entirely within the Tule River Reservation. As noted earlier, the Project is predominantly surrounded by a mix of existing public uses such as the Justice Center, Elders Center, Fire Department, Public Works Department and scattered residential uses to the south; and Tribal Administration, Housing Authority, Health Center, Gymnasium, an Elementary School, Day Care Facility, and scattered residential uses to the north. The Project's length is located near the Village area where Tribe members can access the uses noted earlier. Scattered urban-type mixed uses (as described earlier) are generally adjacent to North Reservation Drive north of the river (where the majority of the Project will occur). The Project also includes areas along South Reservation Road south of the river (see Figure 2-3) where the proposed Project site is along a narrow naturally formed valley of the South Fork of the Tule River (Tule River).

Generally, the topography of this area is relatively uneven-to-relatively flat adjacent to the river, with hillsides rising east of Indian Reservation Drive. Areas within approximately 0.25 miles of the Project site include scattered residences spread within hills. Generally, the undeveloped hillsides of the Sierra Nevada Mountains dominate the immediate surrounding areas.

As noted from an excerpt of the Tule River ATP, at *Vehicular Collisions with Children Crossing Between the Education Center and Gymnasium, "* This area is a priority safety concern due to numerous vehicle collisions with youth is the crossing of North Reservation Road between the Education Center and Gymnasium. These two facilities have frequent crossings as there are numerous community events and activities scheduled between the two locations. There crosswalk markings are deteriorated and are located at an angle to the travel lanes. Additionally there are no sidewalks, bollards, RRFBs or other safety measures to slow vehicle speeds and facilitate safer crossings for children.

Unsafe River Crossings

The Tule River runs from west to east through the Reservation and creates a barrier for pedestrian and bicycle connections to and from residences, public facilities, or community events that are located on both the north and south side of the Tule River. To cross the Tule River, residents have to walk along North and South Reservation Road and cross at the Silver Bridge or Million Dollar Bridge. However, these are not convenient crossing locations and also require residents to walk along unpaved shoulders or within the travel lanes as there are no pedestrian facilities. Currently, residents can cross using the existing Swinging Bridge, which is an informally constructed wire suspension bridge that is approximately 140 feet (ft) long and 3 ft wide with deteriorating planks of wood for the bridge deck. The bridge is a safety concern as it swings during crossings and has large gaps in the bridge deck. Additionally, the bridge is not ADA-compliant. The other crossing point is between the residences and Daycare Center along Cow Mountain Road to the Justice Center. The Justice Center provides residents with public facilities including showers. Residents will hike down the vegetated hillside and cross the stony river bed when water levels are low. However, during the summer months when it is hot, residents need to be careful of rattlesnakes. During the winter months, when river levels are high, residents cannot use the crossing point and have to walk long distances along Reservation Road.

Existing Street System

The Project is located within the Village Area (the community and civic center) of the Tule River Reservation, a rural area in Porterville, Tulare County. The Village Area has had longstanding issues with pedestrian and vehicle collision accidents along North Reservation Road, as it is the primary transportation corridor for vehicles and pedestrians.

However, there are no pedestrian facilities along North Reservation Road or throughout the Reservation. Since it is the primary transportation corridor, residents and children walk along

unpaved shoulders (some areas lack roadway shoulders so residents walk within the travel lane) or informal river crossings to access key community services and facilities including the Tribal Education Center, Gymnasium, Community Health Clinic, Tribal Council, Justice Center, Cow Mountain Daycare Center, and other public service buildings. To address longstanding and immediate pedestrian safety concerns, the community identified the highest priority areas as the following:

1. Youth crossings between the Education Center and Gymnasium; and
2. Residents and youth informally crossing the Tule River to access residences, public services, or community events.

Most transportation modes in Tule River include horses, quads, bikes, walking, motorcycle. Additionally, Residents use an informal dirt trail along the southern edge of the Tule River to avoid the road. The trail used to be a cattle trail. Residents use the pedestrian-only Swinging Bridge to cross between North and South Reservation Rd. It is the only crossing point between Silver Bridge to Million Dollar Bridge. It is an informal suspension bridge with wooden planks." (see ATP, pages 20-21)

Transit

"According to the TCAG 2022 Regional Transportation Plan (RTP) Tribal Outreach Strategy, The City of Porterville is the closest community to the reservation and many tribe members live, work and recreate in Porterville. Additionally, many of their children attend Porterville schools. The City of Porterville has a long-standing relationship with the tribe and contracts with them to provide needed services, including transit. According to the City of Porterville, Transit Route 9 is not currently operating to the Tule River Reservation, but a modified Route 9 may be started up later in 2022. The Tribal Council would like to alter Porterville Transit's Route 9 to end at the Park & Ride lot located at the intersection of Highway 190 and Road 240. Tribal transportation would then pick up residents and bring them into the Tule River Reservation. A checkpoint would be installed west of Water Tower Road / BIA 240, where residents would provide identification. This would reduce the number of non-residents entering the Tule River Reservation and youths riding the bus into town and not returning." (see ATP, page 22)

Collision Data

"There is a lack of collision data available through the Statewide Integrated Traffic Records System (SWITRS) regarding the Tule River Reservation. SWITRS is a database of collisions and traffic-related accidents that are reported by the California Highway Patrol. The Transportation Injury Mapping System (TIMS) was used to map SWITRS data between January 1, 2012 to December 31, 2021, which indicated that 10 total crashes occurred with 12 total injured during this 10-year period within the Tule River Village Area. No pedestrians or bicyclists were involved in any of the 10 SWITRS-documented incidents." (see ATP, page 23)

Figure 3-3 Existing Conditions



FIGURE 2.4 VILLAGE AREA



FIGURE 2.5 VEHICLE CROSSING

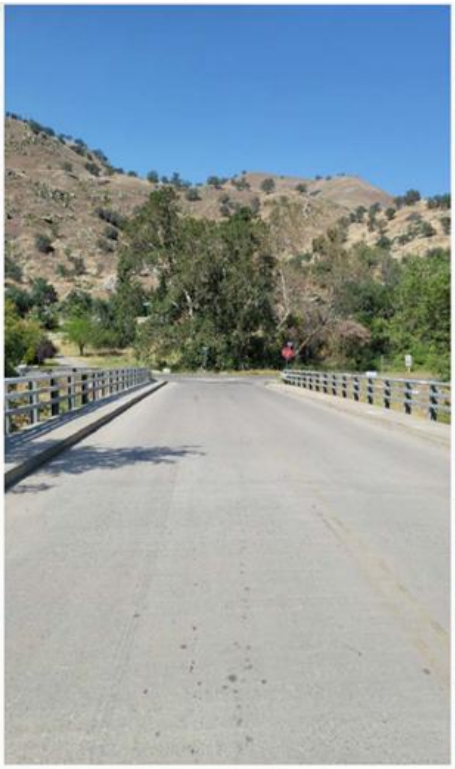


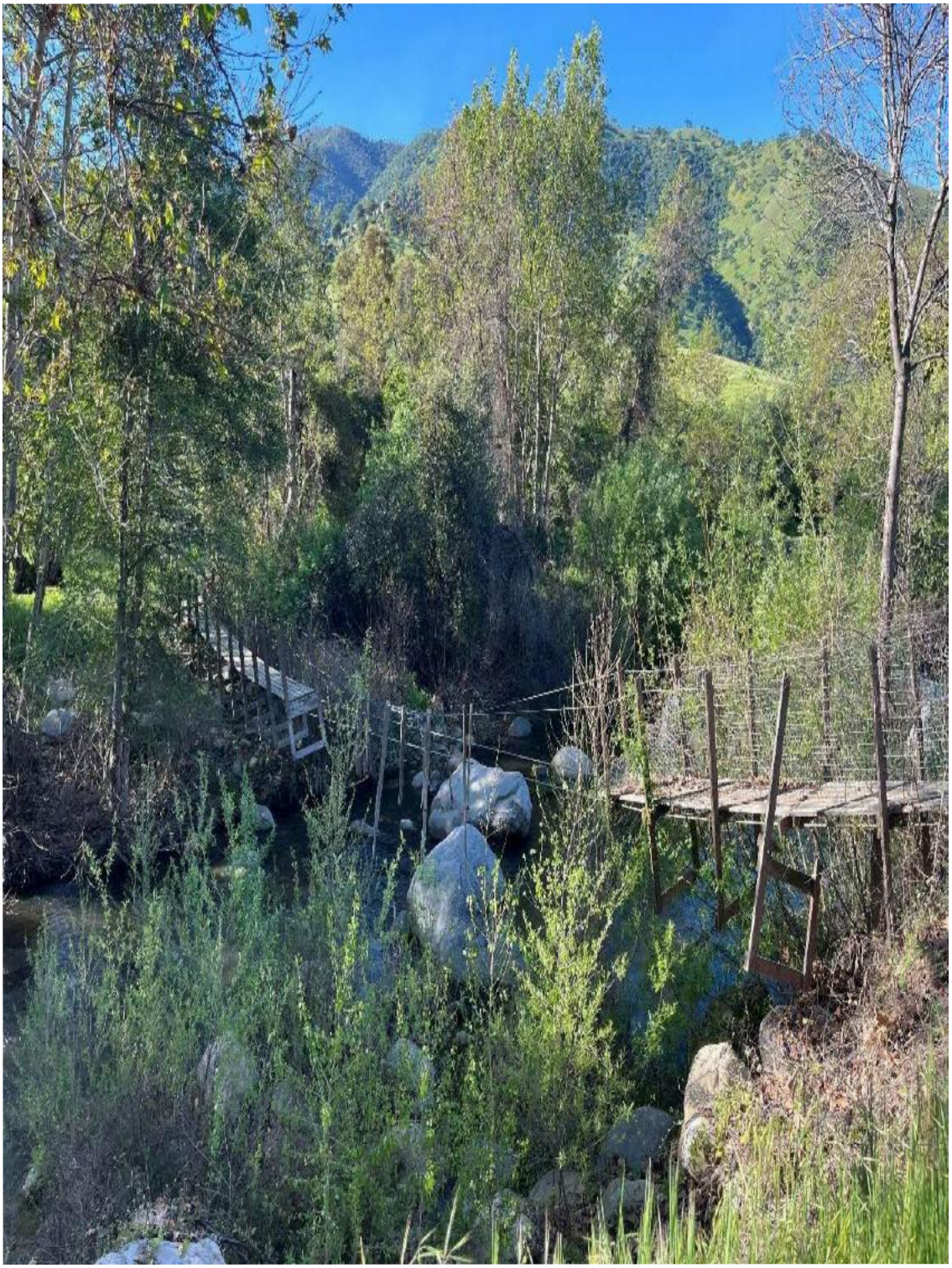
FIGURE 2.6 VEHICLE CROSSING



FIGURE 2.7 SWINGING BRIDGE

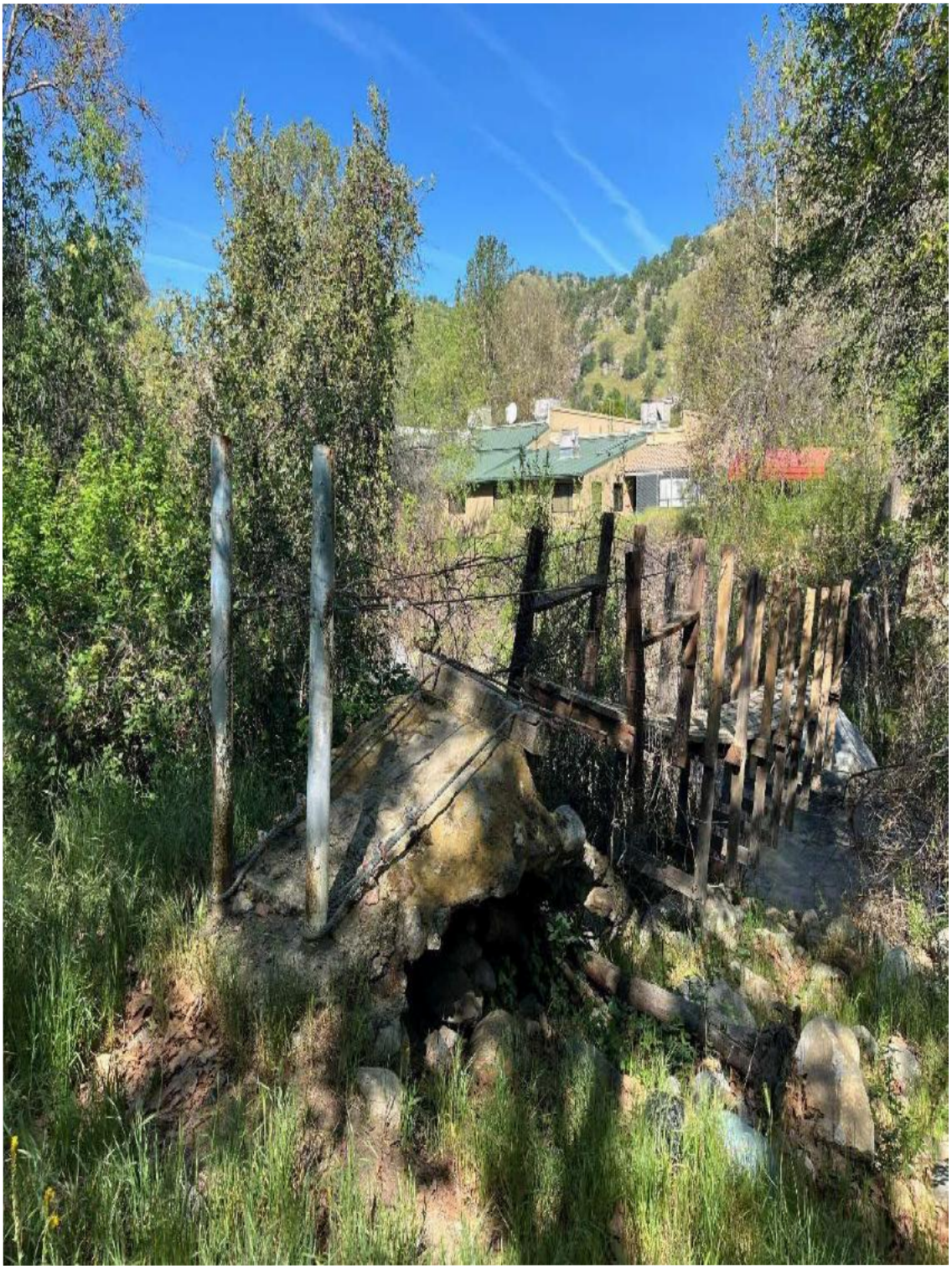
Note: Figure 2-7 depicts the pedestrian bridge prior to its destruction by Tule River floodwaters

Figure 3-4: Existing pedestrian bridge condition facing south



Source: CRA prepared by Soar Environmental Consulting; Appendix C

Figure 3-5: Existing pedestrian bridge condition facing northwest



Source: : CRA prepared by Soar Environmental Consulting; Appendix C)

Figure 3-6 Aerial View of Project Area Existing Conditions

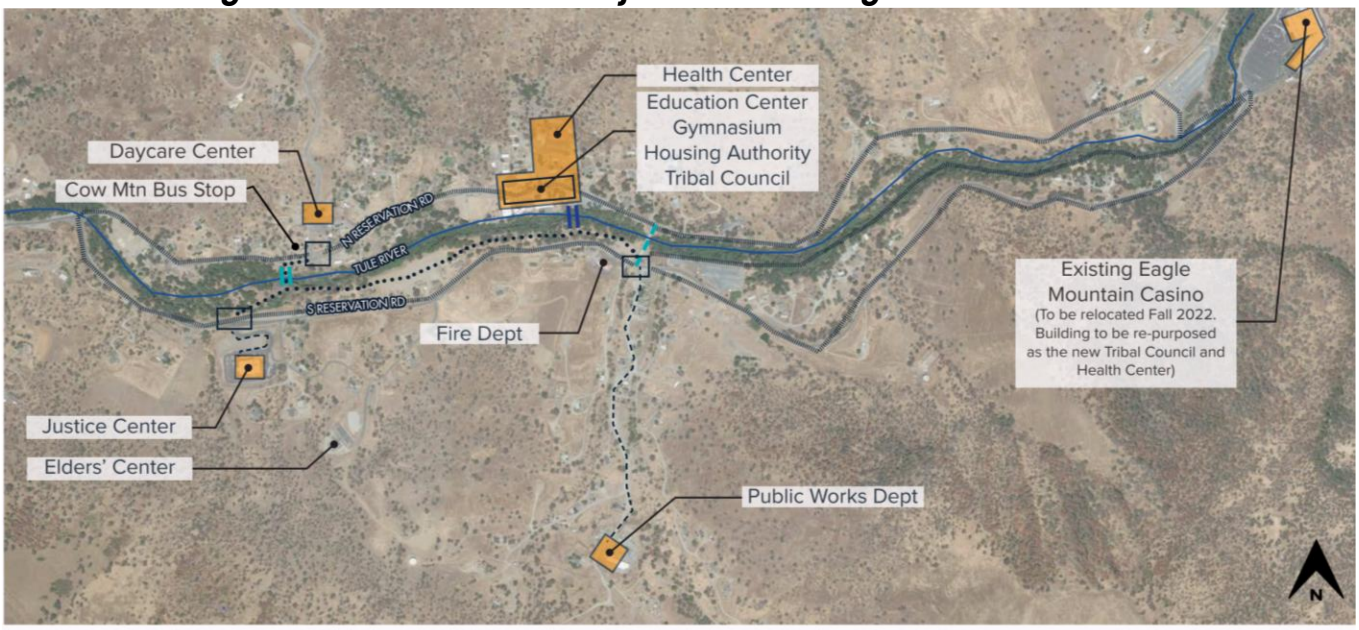
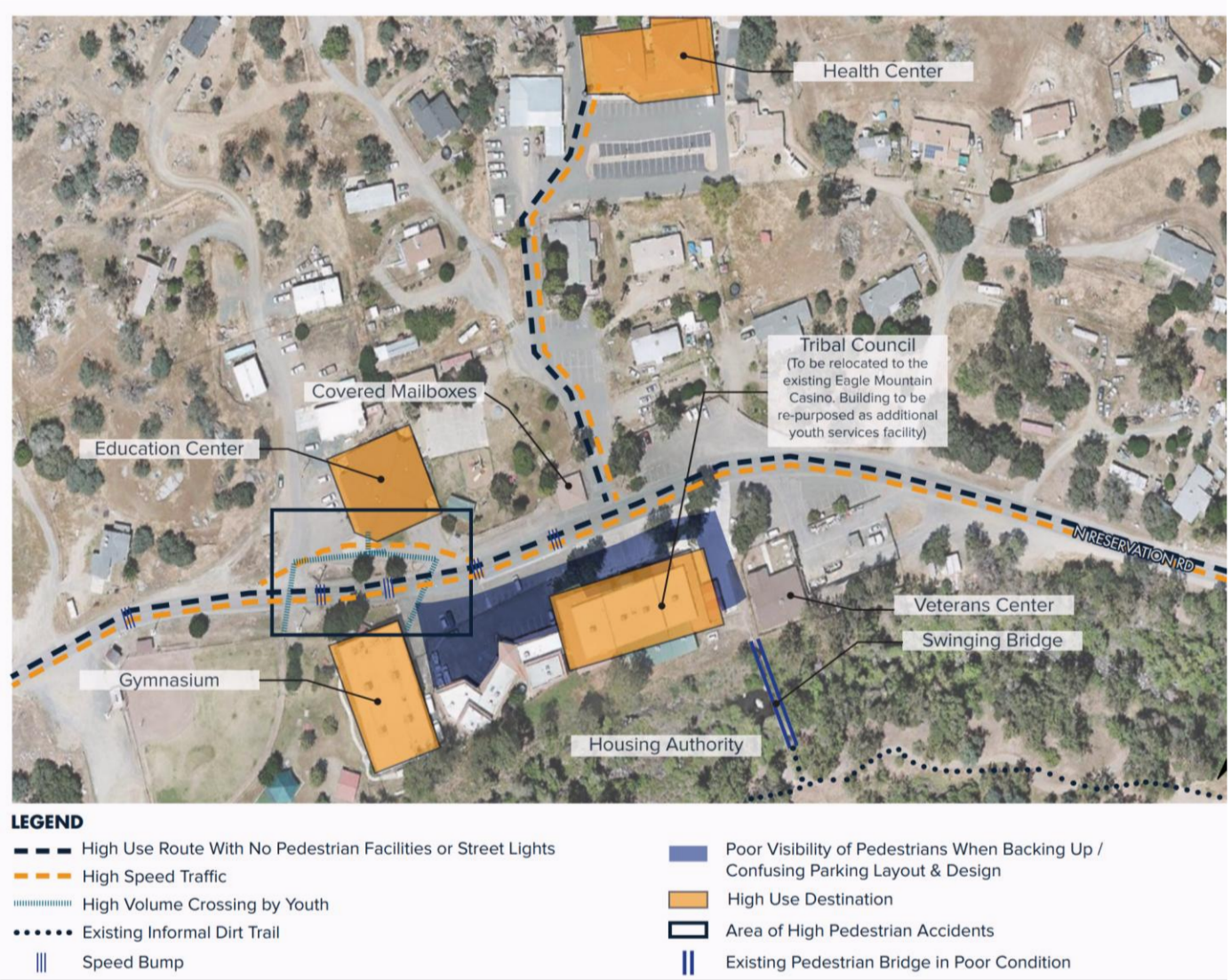


Figure 3-7 Aerial View of The Village Existing Conditions



Truck Routes

None that would apply to the Project.

Rail

None that would apply to the Project.

Bicycle and Pedestrian Facilities

The are no pedestrian sidewalks or bicycle facilities within the Project area. The intent of the Project can be summarized as providing pedestrian enhancement in the form of sidewalks, a

trail, two pedestrian bridges, crosswalks, signage and other amenities as previously noted at the Project description (see page 3-3).

Airports

None that apply to the Project. The nearest airport is Porterville Municipal Airport approximately 14 miles west of the Tule River Reservation.

Regulatory Setting

Federal

National Environmental Policy Act (NEPA)

The National Environmental Policy Act (NEPA) is implemented by regulations included in the Code of Federal Regulations (40 CFR § 1500.), which require careful consideration of the harmful effects of federal actions or plans, including projects that receive federal funds, if they may have a significant adverse effect on the environment. NEPA mandates that all federal agencies carry out their regulations, policies, and programs in accordance with NEPA's policies of environmental protection.

Any project undertaken on the recommendation of this document may meet the definition of a "project" under the National Environmental Policy Act (NEPA), and will be subject to NEPA review if the project receives Federal funding." (see Tule River ATP, page 7) The implementation project is not a "federal action" as defined by NEPA, 24 CFR 1508.18 and therefore is not subject to further review under NEPA. The implementation is a Categorically Excluded project pursuant to Federal Guidelines.

"Federal Land Policy Management Act

Federal Land Policy Management Act (FLPMA) specifically directs the Bureau of Land Management (BLM) to coordinate with state, local, and tribal governments to assist in resolving inconsistencies between BLM's land-use plans and local land-use plans, to the maximum extent consistent with federal law and the purposes of FLPMA" (Tule River ATP, page 7)

United States Department of Transportation Act of 1966 (Section 4[f])

Section 4(f) of the United States Department of Transportation (USDOT) Act of 1966 affords special protection to public recreational lands and facilities, including: local parks and school facilities that are open and available to the general public for recreational purposes; significant cultural resources; historical resources; and natural wildlife refuges. Federally funded transportation improvement projects are prohibited from the encroachment (direct or

constructive use, or a take) of Section 4(f) lands unless it can be demonstrated that no feasible and prudent alternative exists.

State

California Transportation Plan

"The California Transportation Plan (CTP) 2050 (2021) is a long-range plan to create "safe, resilient, and universally accessible transportation system that supports vibrant communities, advances racial and economic justice, and improves public and environmental health. The CTP 2050 identifies transportation needs voiced by Tribal Communities including:

- Reliable access to Tribal lands
- Road safety
- Multi-jurisdictional communication
- Inadequate funding
- Transportation planning capacity
- Multimodal mobility
- Culture resources protection; etc." (Tule River ATP, page 8)

Senate Bill (SB) 743

With the passage of SB 743 (September 2013) and the subsequent adoption of revised CEQA Guidelines (December 2019), level of service, also referred to as LOS, can no longer be used as a criterion for identifying significant transportation impacts for most projects under CEQA. Level of service is the measure of the average amount of delay experienced by vehicle drivers at an intersection or along a road segment during the most congested time of day, while the new CEQA metric (VMT) measures the total number of daily miles traveled by vehicles on the roadway network and thereby the impacts on the environment from those miles traveled. Level of service is a measure of local vehicle congestion at an intersection or on a road segment, and VMT is a measure of the total miles of vehicle travel measured at an area-wide or project-level scale. In other words, SB 743 changed the focus of transportation impact analysis in CEQA from measuring quality-of-life impacts to drivers, to measuring the physical impacts of driving on the environment. According to the Governor's Office of Planning and Research (OPR) Technical Advisory on Evaluating Transportation Impacts in CEQA (Technical Advisory)1 land use projects with one or more of the following characteristics would generate lower VMT than conventional development:

- Higher land use densities
- Mix of project uses
- Support of a citywide jobs-housing balance (i.e., provide housing in a job rich area, or vice versa)
- Proximity to the core of a region
- Proximity to high-quality transit service
- Located in highly walkable or bikeable areas

As the Project is located in a highly walkable and bikeable area, it is consistent with the intent of SB 743 to reduce vehicle miles travelled.

California Department of Transportation (Caltrans)

Caltrans is the primary State agency responsible for transportation issues. Caltrans recognizes four classifications of bicycle facilities.

- Class I. Commonly referred to as a bike path or bikeway, Class I facilities are separated from automobile traffic for the exclusive use of bicyclists.
- Class II. Commonly referred to as bike lanes, Class II facilities are dedicated for bicyclists immediately adjacent to automobile traffic.
- Class III. Commonly referred to as bike routes, Class III facilities are on-street routes where bicyclists and automobiles share the road.
- Class IV. Commonly referred to as cycle tracks or protected bike lanes, Class IV facilities combine elements of Class I and Class II facilities to offer an exclusive bicycle route immediately adjacent to a roadway, similar to a Class II facility, but include a physical separation from traffic with raised curbs, plastic delineators, or parked automobiles.

State of California Active Transportation Program 2040

The Active Transportation Program (ATP) is a statewide program administered by Caltrans that provides funding for infrastructure that

1. Increases the proportion of trips accomplished by biking and walking;
2. Increase safety and mobility for non-motorized users;
3. Advances the active transportation effort of regional agencies to achieve greenhouse gas (GHG) reduction goals;
4. Enhances public health;
5. Ensures that disadvantaged communities fully share in the benefits of the program; and
6. Provides a broad spectrum of projects to benefit many types of active transportation users. ATP funding prioritizes projects that directly benefit DACs. (see page 33 at https://catc.ca.gov/programs/active-transportation-program)

Multimodal System Enhancement, Active System (Bicycling and Walking) of the CTP 2040

California must continue to promote active transportation. It is a key component of the CTP 2040. Programs such as the Active Transportation Program (ATP) were created to encourage increased use of these active modes of transportation by increasing proportion, mobility, and accessibility of biking and walking trips. These trips enhance public health while reducing GHG and congestion. Often the transit system and active transportation go hand-in-hand. Thus, another proven practice is to implement more Complete Streets policies throughout cities in California. Complete Streets are those that enable safe access and mobility amongst motorists, bicyclist, pedestrians and transit service. (See California Transportation

Commission, ATP at MULTIMODAL SYSTEM ENHANCEMENTS, ACTIVE TRANSPORTATION SYSTEM (BICYCLING AND WALKING), page 63, at: http://www.catc.ca.gov/programs/ATP.htm.)

Tribal Government Funding and Partnerships of the CTP 2040

"In the Tribal Listening Sessions conducted as preparation for creating this plan, tribal government representatives noted that funding is the main transportation difficulty they face. Transportation funding is vital for providing needed community services and sustaining vibrant and diverse tribal economies. Funding for tribal transportation projects is also necessary for facilities needed by tribal communities in their mostly rural settings.

Planning funds are essential in helping tribes develop their transportation systems. Transportation plans are required for several programs and are the foundation of successful transportation systems. A crucial component of planning, and therefore funding, is data. Many tribal governments lack sufficient data for planning and funding purposes due to lack of funding and rural locations. Recreational traffic is often not counted in many traffic studies. Tribes must also overcome institutional restrictions to partner with local and regional transportation agencies. As a result, many tribes experience difficulties accessing transportation funding.

Accessing transportation funding is a priority goal of California tribal governments. As Stated previously, Native American tribes are sovereign governments. In California, a majority of transportation funding is given to local governments or regional agencies. Thus, tribes must compete with cities, counties, and other local agencies for limited funds. This intense competition makes it difcult for tribal governments to access needed funding and provide essential services to their communities. New strategies are required to improve tribal transportation systems.

Innovative funding mechanisms are critical in providing better funding access. Partnerships between tribes, local governments, and regional agencies create new opportunities in transportation and provide mutually beneficial solutions to community problems. Building collaborative and cooperative relationships help ensure maximum benefits and efficiency for all. In addition, other creative solutions could empower tribal governments to develop their own transportation networks. These solutions may include partnerships with multiple tribal governments in tribal transportation funding districts, a separate funding reservation for tribes, and special transportation districts." (See: California Department of Transportation's (Caltrans) California Transportation Plan 2040 (CTP 2040) page 34 at: https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/f0004899_ctp2040_a11y.pdf)

California Department of Transportation's (Caltrans) California Transportation Plan 2050 (CTP 2050)

"Tribal Nations

California has the largest Native American population of any U.S. state, with 109 federally recognized tribes in 34 counties, and many without Federal recognition. There are almost 100 Tribal reservations (Rancherias) throughout the state, and large groups of Native Americans (indigenous Californians and other Native peoples) living in major urban areas such as Oakland, San Francisco, San Jose, San Diego, and Los Angeles. Federally recognized Tribes are sovereign nations, administering programs and providing services to Tribal and non-Tribal members of the community. In accordance with EO B-10-11 (2011), California engages with Native American groups in consultation of transportation planning activities and for the advancement of environmental justice goals.

Federal and states laws are also in place to protect tribal lands, assets, resources, and rights for the benefit of tribes and their members. The California State Transportation Agency (CalSTA) Tribal Transportation Policy obligates respect for tribal sovereignty and pursuit of good-faith relations with tribes and the Director's Policy 19, "Working with Native American Communities", requires the Department to "recognize and respect important California Native American rights, sites, traditions, and practices" as well as to "[consult] with tribal Governments prior to making decision, taking actions or implementing programs that may impact their communities." The Caltrans Native American Liaison Branch (NALB) serves as a liaison between Caltrans, the 109 Federally recognized tribes in California; state, local, and regional transportation agencies; and other key stakeholders. NALB facilitates compliance with Caltrans policy and federal statutes and regulations for Tribal Governments involvement in transportation planning and programming. The program also works to help California Native American communities identify and implement transportation safety solutions that will lead to improved safety for all motorists, passengers, bicyclists, and pedestrians, as well as help Tribal governments identify potential sources of funding for improvements.

Tribal Transportation Needs

- Tribal listening sessions were held across the state to better understand the transportation needs facing Tribal communities. The following key themes emerged:
- Reliable access to Tribal lands
- Road safety
- Multi-jurisdictional communication
- Inadequate funding
- Transportation planning capacity
- Multimodal mobility
- Culture resources protection
- Emergency response
- Training and technical assistance
- Active partnerships" (See CTP 2050, pages 34-35)

Tribal Government Funding Partnerships

In the Tribal Listening Sessions conducted as preparation for creating this plan, tribal government representatives noted that funding is the main transportation difficulty they face. Transportation funding is vital for providing needed community services and sustaining vibrant and diverse tribal economies. Funding for tribal transportation projects is also necessary for facilities needed by tribal communities in their mostly rural settings.

Planning funds are essential in helping tribes develop their transportation systems. Transportation plans are required for several programs and are the foundation of successful transportation systems. A crucial component of planning, and therefore funding, is data. Many tribal governments lack sufficient data for planning and funding purposes due to lack of funding and rural locations. Recreational traffic is often not counted in many traffic studies. Tribes must also overcome institutional restrictions to partner with local and regional transportation agencies. As a result, many tribes experience difficulties accessing transportation funding.

Accessing transportation funding is a priority goal of California tribal governments. As Stated previously, Native American tribes are sovereign governments. In California, a majority of transportation funding is given to local governments or regional agencies. Thus, tribes must compete with cities, counties, and other local agencies for limited funds. This intense competition makes it difficult for tribal governments to access needed funding and provide essential services to their communities. New strategies are required to improve tribal transportation systems.

Innovative funding mechanisms are critical in providing better funding access. Partnerships between tribes, local governments, and regional agencies create new opportunities in transportation and provide mutually beneficial solutions to community problems. Building collaborative and cooperative relationships help ensure maximum benefits and efficiency for all. In addition, other creative solutions could empower tribal governments to develop their own transportation networks. These solutions may include partnerships with multiple tribal governments in tribal transportation funding districts, a separate funding reservation for tribes, and special transportation districts." (CTP Plan 2040, page 34)

Regional

Tulare County Association of Governments (TCAG)

2018 Regional Transportation Plan and Sustainable Communities Strategy (RTS/SCS)

"TCAG Regional Active Transportation Plan

TCAG Regional Active Transportation Plan (RATP) (adopted May 2016; amended November 2017, January 2020) identifies the pedestrian and bike related goals, strategies and priority

projects that were incorporated into the Tulare County Regional Transportation Plan / Sustainable Communities Strategy (RTP/SCS). The RTAP identifies the one priority project (R-1) for the Tule River Reservation, which proposes implementing pedestrian safety features on North Reservation Road between Cow Mountain Road and the Million Dollar Bridge. The project includes sidewalk installations, safety signage, river walkways and bridge walkways, and speed bumps. However, Caltrans has requested that traffic-calming alternatives to speed bumps be considered due to the damage the bumps can cause to cars. The estimated costs was $2,399,000." (2018 RTP/SCS page 125)

"Tulare County Regional Transportation Plan - Sustainable Communities Strategy

As required by the Sustainable Communities and Climate Protection Act of 2008 (Senate Bill 375), the 2018 Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS) contains a Sustainable Communities Strategy that considers both land use and transportation together in a single, integrated planning process that accommodates regional housing needs and projected growth. The 2018 RTP/SCS updates the current RTP/SCS adopted by TCAG in June 2014 and continues the planning vision for the Tulare County region laid out by the 2014 plan. As have past Regional Transportation Plans, the 2018 RTP/SCS plans how the region will invest limited transportation funds to maintain, operate and improve an integrated, multi-modal transportation system that facilitates the efficient movement of people and goods. The updated plan identifies specific strategies, policies and actions, including a list of programmed and planned transportation projects affordable within the region's anticipated reasonably available transportation funding, to achieve regional goals and priorities and meet the current and future needs of the region. The planning horizon of the 2018 RTP/SCS is 2042." (2018 RTP/SCS Sustainable Communities Strategy, page D-1 at: https://tularecog.org/tcag/planning/rtp/rtp-20181/

"TRIBAL CONSULTATION

TCAG continues consultation efforts with the Tule River Indian Reservation in Tulare County. TCAG strives to have at least one formal consultation a year and other staff-level or informal meetings as needed. A member of the Tule River Indian Reservation has been on the TCAG Technical Advisory Committee since 2001. Further, TCAG is one of only a few MPOs in the state that has had a MOU with a Tribe to develop and construct a state-funded transportation safety project. An important safety project, for Reservation Road, was completed in 2007.

In 2009 TCAG participated in the Valley-wide Tribal Collaboration effort made possible with a Caltrans Planning Grant for transportation planning and mapping. The grant was awarded to the eight Valley MPOs and completed in September in 2009. Collaboration efforts with Valley tribes continue. In December 2012 the City of Porterville started a fixed route service between the city and the Tule River Reservation. In 2021, The Chairman of the Tule River Tribal Council sent a formal request for TCAG's partnership with the City of Porterville in managing the creation and development of the Tribe's very first Active Transportation Plan (ATP). The ATP

focuses on improving bicycle and pedestrian infrastructure in terms of both safety and accessibility. Other information regarding TCAG's ongoing tribal consultation efforts is in Appendix 2-Z – Tribal Public Participation Plan." (2022 RTP/SCS Communities Strategy, Chapter D Action Element, pages D-29 and D-30 at: https://tularecog.org/tcag/planning/rtp/rtp-2022/chapter-d-action-element/).
https://drive.google.com/file/d/1eHl1QA21_cb2Bgs_WoDP9VeHoVVUX11w/view

Local

Sustainable Transportation Circulation Element for the Tule River Comprehensive Master Plan

Tule River Tribe Sustainable Transportation/Circulation Element (STCETRMP)

"The Sustainable Transportation/Circulation Element for the Tule River Comprehensive Master Plan (STCETRMP) will be developed with a multi-modal approach to sustainable transportation. As such it will include roads, transit, bicycles, pedestrians, trails and parking. The Plan will be directly linked to planned land uses currently under development by the Tribe. The Plan will address the need for the maintenance of existing roads within the Reservation and the expansion of the road network to serve future development of the Tribe. The Sustainable Transportation/Circulation Element includes an inventory of the existing conditions and projection of future conditions with the development of the planned land uses and supporting transportation systems." (Sustainable Transportation/Circulation Element for the Tule River Comprehensive Master Plan (STCETRMP), page 16, which can be accessed at: https://drive.google.com/file/d/1eHl1QA21_cb2Bgs_WoDP9VeHoVVUX11w/view

"Tule River Tribe Sustainable Transportation/Circulation Element Sustainable Transportation/Circulation Element for the Tule River Comprehensive Master Plan (STCETRMP) will be developed with a multi-modal approach to sustainable transportation. As such it will include roads, transit, bicycles, pedestrians, trails and parking. The Plan will be directly linked to planned land uses currently under development by the Tribe. The Plan will address the need for the maintenance of existing roads within the Reservation and the expansion of the road network to serve future development of the Tribe. The Sustainable Transportation/Circulation Element includes an inventory of the existing conditions and projection of future conditions with the development of the planned land uses and supporting transportation systems." (STCETRMP, page 17).

"In 2012 the Tule River Indian Tribe prepared it first transit plan. This document is unique in its approach to planning for Tribal transit service within this very dynamic community. With the completion of this Plan, the Tribe has been working toward a more integrated transit system. The Plan provides guidance for the future development of both inter-community and intra-community service. The over-arching goal is to provide for expanded access to jobs for tribal members off-Reservation as well as better access to on-Reservation jobs for employees living

in outlying communities. The Plan will also address the need for expanded access to educational opportunities within the City of Porterville.

The Tule River Indian Tribe prepared the five-year Transit Plan (TP) as a prelude to planning, programming and implementation of both inter-community and intra-community transit service. This plan was prepared in cooperation with the Tule River Indian Tribe and with assistance from the Tulare County Association of Governments and the City of Porterville. This Transit Plan presents a summary of the existing conditions related to transit services within area, defines the goals and objectives of the system, and presents a five-year service, capital, and financial plan for the system. As part of this process the Transit Plan will be updated to include the years 2018 to 2022." (see STCETRMP, page 17)

Chapter 2 Policies of the STCETRMP contain numerous policies that address the Roads System, Tribal Transit System, Bicycle System, Pedestrian System, Multi-Use Trail System and Greenhouse Gases. The policies interact and complement each other to provide sustainability. The following addresses active transportation:

"ACTIVE TRANSPORTATION (BICYCLE AND PEDESTRIAN MODES) GOAL: IMPROVE, ENHANCE, AND EXPAND THE REGION'S BICYCLE AND PEDESTRIAN SYSTEMS AND CONNECTIVITY TO THOSE SYSTEMS, WHILE KEEPING THEM SAFE AND CONVENIENT.

Objective: Encourage bicycle usage in Tulare County by providing safe and convenient bike routes and facilities as outlined in the Tulare County Regional Transportation Bicycle Plan, and coordinate pedestrian planning with bicycle planning countywide.
Policies:

1. Update the Regional Bicycle Plan every four years to identify bicycle routes that are appropriate for commuter, recreational, and student riders.
2. Convene public outreach and implement strategies for Share the Road concepts.
3. Designate and design regional bicycle and pedestrian routes that reduce conflicts with motor vehicles.
4. Encourage local agency review of bicycling and pedestrian needs with all new development.
5. Encourage local agencies to support implementation of bicycle support facilities such as bike racks, showers, and other facilities during the project review process.
6. Coordinate bicycle and pedestrian planning and implementation with other modes of transportation, particularly with transit.
7. Support development of designated regional bicycle and/or walking paths adjacent to or separate from commute corridors, connecting cities and communities.
8. Support implementation of local bicycle, pedestrian, and trail plans.
9. Utilize Cap and Trade funds available for bicycle and pedestrian projects, if available, for projects in Tulare County." (see STCETRMP, page 6)

Chapter 2 Policies of the STCETRMP contain numerous policies that address the Roads System, Tribal Transit System, Bicycle System, Pedestrian System, Multi-Use Trail System and Greenhouse Gases. The policies interact and complement each other to provide sustainability. As noted in Chapter 2: Policies of the STCETRMP, "Given the Tribe's Planning Vision Statement and their historic relationship with the environment, the development of this plan is by nature, sustainable. The Tribe does recognize the value of planning for the future and the benefits attained through the development of long range policies to support sustainability. With plans to develop within the Reservation as well as pursuing off-Reservation economic opportunities, the Tribe is committed to the integration of land use, transport, economics and the environment into the decision making process and project execution.

The following policy statements were developed to support this multi-modal approach to Tribal sustainability. They are timeless and as such will need to be reviewed and refined as opportunities arise. They are intended to support the Sustainable Transportation Plan's Goal and the Tribe's planning vision of consideration of three generations in the future. They should be reviewed on a regular basis and refined as the system matures." (see STCETRMP, page 22). For the purposes of this Project, the Bicycle System, Pedestrian System, Multi-Use Trail System, and Greenhouse Gas[es] policies would apply:

"Bicycle System

CP 3.1 Bicycle System
The Tule River Indian Tribe shall develop the transportation system to support commuter and recreational bicycle usage. Focus will be on the rural nature of the road system and the need for school bike trips and opportunities for recreational biking within the Reservation.

CP 3.2 Regional Bicycle Transportation Plan
The Tule River Indian Tribe County shall coordinate with TCAG and other agencies to integrate the Reservation bike facilities into the regional network. This effort shall include updating and possibly including Tule River Indian Tribe's improvement projects into the Tulare County Regional Bicycle Transportation Plan.

CP 3.3 Provisions for Bicycle Use
The Tule River Indian Tribe shall provide for bicycle use through the development of Reservation roads with a minimum of 4 foot shoulders, bike lanes (where appropriate) and multi-modal trails. Bike lockers and supporting signage and striping shall be placed at activity centers.

CP 3.4 Provisions for Bicycle Use
The Tule River Indian Tribe will implement a bike safety program with emphasis on school children and drivers.

CP 3.5 Provisions for Bicycle Use

Along with the bike safety program, the Tule River Indian Tribe will implement a community awareness program to educate Tribal members on the health and environmental benefits of cycling and the availability of the bike system and support facilities.

Pedestrian System

CP 4.1 Sidewalk Facilities
The Tule River Indian Tribe shall support pedestrian activity through the development of sidewalks in activity centers and new developments. Sidewalks shall be developed to provide for all-weather movements and be a minimum of 5 feet in width. Location should reflect the terrain, available road width and pedestrian and vehicle safety.

CP 4.2 Road Shoulders
Because of the rural nature of the Reservation, the road system represents a significant part of the pedestrian system. The Tule River Indian Tribe shall improve pedestrian mobility by development of the Reservation road shoulders to support better pedestrian movement.

CP 4.3 Focus Areas
The Tule River Indian Tribe shall develop a sidewalk system within the Governments Center to support the pedestrian activity associated with the Education Center, the Medical Center, the Government Center and the future Cultural Center. This pedestrian system shall include crosswalks and traffic calming facilities.

Multi-Use Trail System

CP 5.1 Multi-use Trails
The Tule River Indian Tribe shall develop multi-use corridors composed of hiking, equestrian, biking and pedestrians.

CP 5.1 Tule River Trail
A multi-use trail along the Tule River corridor shall form the backbone of the trail system. Other trails shall be developed to provide access to the Specific Plan areas and the Reservation back country.

CP 5.2 Horse and Hiking Trails
The Tule River Indian Tribe shall also support the development of a horse and hiking trail system, which provides access to the activity centers within the Reservation along with open space in the back country.

Greenhouse Gas[es]

CP 6.1 Global Warming Solutions (AB 32)

The Tule River Indian Tribe will support the goals of AB 32, through the implementation of this Sustainable Transportation/Circulation Element.

CP 6.2 Greenhouse Gas Reduction
The Tule River Tribe supports the legislative goal to reduce or encourage reductions in GHG emissions by at least 15%.

CP 6.3 Sustainable Communities Strategy/Regional Blueprint Planning
The Tribe will support the Tulare County Sustainable Communities Strategy through the implementation of this sustainable transportation program and the development of sustainable land use plans." (STCETRMP, pages 23-24).

Discussion

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

No Impact: As noted earlier, the nature of the Project can be summarized as pedestrian safety enhancements and pedestrian bridges, sidewalks, and paths that encourage active walking and cycling. As such, the Project does not conflict with a program plan, ordinance or policy addressing the circulation system, including transit, bicycle, and pedestrian facilities. Rather, as noted earlier, the Tribe has numerous policies that encourage and support development and the use of a multi-modal approach that includes pedestrian and cycling. Therefore, the Project would result in *no impact* to this resource.

Mitigation Measures: None Required.

b) Would the Project conflict or be inconsistent with CEQA Guidelines Section 15064.3, Subdivision (b)?

No Impact: As noted earlier, the nature of the Project can be summarized as pedestrian safety enhancements and pedestrian bridges, sidewalks, and paths that encourage active walking and cycling. Senate Bill (SB) 743 requires that relevant CEQA analysis of transportation impacts be conducted using a metric known as vehicle miles traveled (VMT) instead of Level of Service (LOS). VMT measures how much actual auto travel (additional miles driven) a proposed project would create on California roads. Using information contained in the Governor's Office of Planning and Research (OPR) *Technical Advisory on Evaluating Transportation Impacts in CEQA*, the Project has been screened out from requiring a detailed VMT analysis based on the findings that the Project would not increase vehicle miles traveled (VMT) due to increases in residential, office, and retail uses that tend to have the greatest influence on VMT; would include the addition of new or enhanced bike or pedestrian facilities on existing streets/highways or within existing public rights-of-way;

and would include the addition of Class I bike paths, trails, multi-use paths, or other off-road facilities that serve nonmotorized travel. (see of the Governor's Office of Planning and Research (OPR) *Technical Advisory on Evaluating Transportation Impacts in CEQA* (December 28, 2018), pages 14 and 18 at: https://lci.ca.gov/docs/20180416-743_Technical_Advisory_4.16.18.pdf). Rather, as noted earlier, the Project would develop and encourage the use of a multi-modal approach that includes pedestrian and cycling with enhanced safety components. Therefore, based on the analysis and information provided herein, the Project's impact on VMT would be *less than significant*.

Mitigation Measures: None Required.

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

No Impact: As noted earlier, the nature of the Project can be summarized as pedestrian safety enhancements and pedestrian bridges, sidewalks, and paths that encourage active walking and cycling with enhanced safety components (e.g., sidewalks, signage, crosswalks, striping, etc.). As such, the proposed Project does not include any features that could result in increased hazards due to a geometric design feature. Therefore, based on the analysis and information provided herein, the Project would result in *no impact*.

Mitigation Measures: None Required.

d) Would the Project result in inadequate emergency access?

No Impact: As noted earlier, the nature of the Project can be summarized as pedestrian safety enhancements and pedestrian bridges, sidewalks, and paths that encourage active walking and cycling with enhanced safety components (e.g., sidewalks, signage, crosswalks, striping, etc.). During construction-related activities it is possible that traffic management could result in short-term, temporary, and intermittent minor delays; however, emergency access for first responders would be prioritized to allow quick and safe passage to emergency vehicles. As such, the Project would not result in inadequate emergency access. Therefore, *no impact* would occur.

Mitigation Measures: None Required.

Mitigation Measures: None Required.

Based on the analysis and information provided herein, *no mitigation measures are required*.

Cumulative Impact

The cumulative area is limited to the Tule River Reservation. As noted earlier, the nature of the Project can be summarized as pedestrian safety enhancements and pedestrian bridges, sidewalks, and paths that encourage active walking and cycling. As such, the Project would not conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities; it would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, Subdivision (b); it would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses; and it would not result in inadequate emergency access. Also noted earlier, the Project would develop and encourage the use of a multi-modal approach that includes pedestrian and cycling with enhanced safety components. Therefore, based on the analysis and information provided herein, the Project would not result in a cumulatively considerable impact to the Transportation resource and there would be *no cumulative impacts* associated with the Project.

XVIII. TRIBAL CULTURAL RESOURCES

Would the Project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less than Significant Impact	No Impact
a) Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a Site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☐	☑	☐	☐
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 I 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.	☐	☑	☐	☐

Environmental Setting

A response for sacred lands file search from the NAHC for the Study Area was requested received by the City of Porterville on January 20, 2026 and by qualified consultant Soar Enviornmental Consulting (Soar) on February 24, 2026. The City of Porterville (City) notified the tribal representatives about the proposed Project and requested information regarding potential resources at or near the Project area. One (1) tribal response was received during the consultation process. Also, per AB 52, the City initiated Tribal Consultation on March 9, 2026; at the time of release of this document one (1) response has been received. It is noted that the

Tribe is working closely with the City (as the lead agency) and consultant Soar Environmental to ensure a thorough and accurate tribal cultural resources assessment.

Cultural Resources Record Search and Native American Consultation

As indicated earlier at resource discussion V Cultural Resources, the Central California Information Center (Information Center or CCIC), California Historical Resources Information System (CHRIS), Department of Anthropology – California State University, Stanislaus conducted a review of their maps for the specific project area and the immediate vicinity of the project area of the following:

- California Points of Historical Interest (CPHI)
- California Historical Landmarks (CHL)
- California Register of Historical Resources (CRHR)
- National Register of Historic Places (NRHP)
- Historic maps (U.S. Geological Survey topographic quadrangles, General Land Office plats)
- Historical aerial imagery
- Caltrans Historical Bridge Inventory

The records search identified eight prior cultural resources investigations within the Project area. These investigations primarily involved cultural and historic property evaluations of the Tule River Indian reservation, utility line replacement, and fire management surveys." (CRA page 20).

Prehistoric or historic resources within the immediate vicinity of the project area: None has been formally reported to the Information Center.

Also, the NAHC Sacred Lands File search were positive indicating there is a known presence of Tribal resources (see Appendix C). It is noted that NAHC results do not specify the location of tribal cultural resources, and consultation with local tribes was recommended. As noted earlier, the Tribe will be directly involved to ensure their resources are protected to their satisfaction.

Tribal Consultation

In compliance with AB 52, as noted earlier, the City did receive one (1) response from Native American tribes that were contacted during the AB52 consultation process as of the release date of this document. Seven (7) Tribes and ten (10) persons were invited to participate in Tribal Consultation via letters on March 9, 2026, inviting the Tribes to consult with the City regarding the Project. A copy of each letter is available in Appendix C to this report. As of April 18, 2026, one (1) response or requests for consultation was received.

Regulatory Setting

See discussion at Item V Cultural Resources for a more detailed discussion as Tribal Cultural Resources are included in the discussion.

Federal

American Indian Religious Freedom Act

The American Indian Religious Freedom Act establishes, as national policy, that traditional Native American practices; beliefs; sites, including the right of access; and the use of sacred objects shall be protected and preserved. It does not include provisions for compliance.

Native American Graves Protection and Repatriation Act

The Native American Graves Protection and Repatriation Act of 1990 protects Native American remains, including Native American graves on federal and tribal lands, and recognizes tribal authority over the treatment of unmarked graves. This Act prohibits the selling of Native American remains and provides guidelines for the return of Native American human remains and cultural objects from any collection receiving federal funding, such as museums, universities, or governments. Noncompliance with this Act can result in civil and criminal penalties

State

California Environmental Quality Act (CEQA)

CEQA was passed in 1970 to institute a statewide policy of environmental protection. It requires that public agencies that finance or approve public or private projects must consider the impacts of their actions on the environment, of which, Historical Resources, Unique Archaeological Resources, and Tribal Cultural Resources are a part. A project that may cause a substantial adverse change in the significance of a Historical Resource is a project that may have a significant effect on the environment (PRC 21084.1). Section 21083.2 requires agencies to determine whether proposed projects would have effects on Unique Archaeological Resources, and Section 21074(a)(1) concerns effects to Tribal Cultural Resources.

CEQA requires that if a project would result in significant impacts on cultural resources that are important or significant, alternative plans or measures must be considered to lessen or mitigate such impacts. Prior to the development of mitigation measures, the importance of cultural resources must be determined. The steps that are generally taken in a cultural resources investigation for CEQA compliance are as follows:

- Identify cultural resources in a project area;
- If cultural resources exist in the footprint of a project, evaluate the significance of resources;

- If significant resources are determined to exist, evaluate the potential impacts of a project on these resources; and
- Develop and implement measures to mitigate the impacts of the project only on significant resources, namely Historical Resources, Unique Archaeological Resources, and Tribal Cultural Resources

California Health and Safety Code Section 7050.5(b) and CEQA Section 15064.5

Section 7050.5(b) of the California Health and Safety Code specifies protocol when human remains are discovered during activities involving ground disturbance. If human remains are discovered or identified in any location other than a dedicated cemetery, there should be no further disturbance or excavation nearby until the county coroner has determined the area is not a crime scene that warrants further investigation into the cause of death and made recommendations to the persons responsible for the work in the manner provided in PRC Section 5097.98. This section provides guidance for proceeding when human remains associated with Native American burials and associated items are encountered.

CEQA Guidelines Section 15064.5(e) requires that excavation activities stop whenever human remains are uncovered during a project or activity, and that the county coroner be called in to assess the remains. If the county coroner determines that the remains are Native American, the Native American Heritage Commission (NAHC) must be contacted within 24 hours. At that time, the lead agency must consult with the appropriate Native American descendants, if any, as identified by the NAHC. Under certain circumstances, the lead agency (or applicant), is required to develop an agreement with the Native American descendants for the treatment and disposition of the remains

Public Resources Code (PRC) Section 5097.9

PRC Section 5097.9 states that no public agency or private party on public property shall interfere with the free expression or exercise of Native American religion. The code further states that: …nor shall any such agency or party cause severe or irreparable damage to any Native American sanctified cemetery, place of worship, religious or ceremonial site, or sacred shrine located on public property, except on a clear and convincing showing that the public interest and necessity so require. County and city lands are exempt from this provision, expect for parklands larger than 100 acres.

Government Code Section 65352.3-5 (Senate Bill 18)

California Government Code Section 65352.3-5, formerly known as Senate Bill (SB) 18, states that prior to the adoption or amendment of a city or county's general plan, or specific plans, the city or county shall consult with California Native American tribes that are on the contact list maintained by the NAHC. The intent of this legislation is to preserve or mitigate impacts on places, features, and objects, as defined in PRC 5097.9 and PRC 5097.993, that are within the

city or county's jurisdiction. The bill also states that the city or county shall protect the confidentiality of information concerning the specific identity, location, character, and use of those places, features, and objects identified by Native American consultation. Government Code 65362.3-5 applies to all general and specific plans and amendments proposed after March 1, 2005. The SB 18 process was completed during preparation of the Porterville General Plan Update 2042 and its accompanying EIR; however, the SB 18 process does not apply to this Project.

Assembly Bill 52 (AB 52)

Effective July 1, 2015, AB 52 amended CEQA to require that: (1) a lead agency provide notice to those California Native American tribes that requested notice of projects proposed by the lead agency; and (2) the lead agency consult with any tribe that responded to the project notice within 30 days of receipt with a request for consultation. Topics that may be addressed during consultation include Tribal Cultural Resources, the potential significance of project impacts, the type of environmental document that should be prepared, and possible mitigation measures and project alternatives.

A California Native American tribe is defined as "…a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of the Statutes of 2004." This includes both federally and non-federally recognized tribes.

Section 21074(a) of the PRC defines Tribal Cultural Resources for the purpose of CEQA as:

1) Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:
   A. Included or determined to be eligible for inclusion in the California Register of Historical Resources.
   B. Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.

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

Because criteria 1) A and 1) B also meet the definition of a Historical Resource under CEQA, a Tribal Cultural Resource may also require additional consideration as a Historical Resource. Tribal Cultural Resources may or may not exhibit archaeological, cultural, or physical indicators. Recognizing that California tribes are experts in their Tribal Cultural Resources and heritage, AB 52 requires that CEQA lead agencies provide tribes that request notification an opportunity to consult at the commencement of the CEQA process to identify Tribal Cultural Resources. Furthermore, because a significant effect on a Tribal Cultural Resource is

considered a significant impact on the environment under CEQA, consultation is used to develop appropriate avoidance, impact minimization, and mitigation measures

Native American Human Remains

State law (California PRC §5097 et seq.) addresses the disposition of Native American burials in archaeological sites and protects such remains from disturbance, vandalism, or inadvertent destruction; establishes procedures to be implemented if Native American skeletal remains are discovered during construction of a project; and established the NAHC.

In the event that Native American human remains, or related cultural material, are encountered, §15064.5(e) of the CEQA Guidelines (as incorporated from PRC §5097.98) and California Health and Safety Code, §7050.5, define the subsequent protocol. In the event of the accidental discovery or recognition of any human remains, excavation or other disturbances shall be suspended on the site, or any nearby area reasonably suspected to overlie adjacent human remains or related material. Protocol requires that the County Coroner or County-approved Coroner be contacted in order to determine if the remains are of Native American origin. Should the coroner determine the remains to be Native American, the coroner must contact the NAHC within 24 hours. The most likely descendant may make recommendations to the landowner or the person responsible for the excavation work for means of treating, with appropriate dignity, the human remains, and any associated grave goods as provided in California PRC §5097.98 (14 CCR 15064.5(e))(State of California, 2021).

Native American Reservation Cultural Resource Laws and Federal, State, and Local Laws

Federal, state, and local cultural resource laws can apply to Native American tribal reservations, though their application, scope, and enforcement vary significantly due to tribal sovereignty and the complex interplay of jurisdictions. Certain federal laws specifically protect tribal cultural resources and apply directly to reservations or tribal lands. Key examples include the Native American Graves Protection and Repatriation Act (NAGPRA), which governs the protection, repatriation, and handling of Native American human remains, funerary objects, sacred objects, and items of cultural patrimony—particularly on federal or tribal lands—and the Indian Arts and Crafts Act, which safeguards authentic Native American arts and crafts from misrepresentation.

Other federal statutes, such as aspects of the National Historic Preservation Act (NHPA) or Archaeological Resources Protection Act (ARPA), may involve tribal consultation for projects affecting cultural sites, even on tribal lands, especially when federal involvement (e.g., funding, permits, or undertakings) is present. However, enforcement of these laws can be inconsistent, and no single, comprehensive federal framework fully guarantees the long-term preservation and vitality of tribal cultures. State laws may have limited applicability on reservations because tribes generally are not subject to state jurisdiction due to their sovereign status. The relationship is further complicated by dual citizenship: tribal members are citizens of both their

tribe and the United States, subjecting them to federal (and sometimes state) laws alongside tribal ones. This creates a layered system of rights and obligations that tribes, federal agencies, and others may not always fully navigate. In limited areas, such as criminal matters, federal law can incorporate state provisions—for instance, under the Assimilative Crimes Act, certain state criminal violations become federal offenses on reservations. Yet this does not mean all federal (or state) laws automatically extend to every aspect of reservation life or tribal governance.

The fundamental dynamic is a government-to-government relationship between the United States and each federally recognized tribe, with each tribe maintaining its own sovereign legal system and authority. Not every federal law applies uniformly across all reservations. To navigate this effectively, federal agencies, state entities, and local authorities must recognize the unique legal status of reservations, honor tribal sovereignty, and respect tribal traditions. This includes meaningful government-to-government consultation—incorporating tribal input and perspectives—especially for projects or decisions that could affect historic properties, sacred sites, or other cultural resources (Governor's Office of Tribal Affairs, 2026).

Regional/Local

The Tule River Indian Tribe would be responsible for tribal cultural resources and the method/manner on how discovery of all tribal resources would be curated, preserved, or otherwise handled.

Discussion

It is noted that the following discussion is limited to tribal cultural resources. However, overall with other cultural resources (e.g., historical resources) can occur. As such, both the Tribal Cultural and Cultural resources are invariably interconnected. Rather than being repetitive, the reader is encouraged to cross-reference these resources as applicable,

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

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

The Project would not cause a substantial adverse change in the significance of a tribal cultural resource, nor is it listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources. Based on the results of the records search, no previously recorded cultural resources are located within the Project Site. As noted

earlier, AB52 Tribal Consultation letters were sent out by the City via certified mail on month/day, 2026; as of month/day, 2026, __ responses were received during the Tribal consultation process (see Appendix C). Although cultural resources were identified, Mitigation Measures CUL-1 through and CUL-3 would address potential impacts to tribal cultural resources. Therefore, based on the analysis and information provided herein, the Project would result in a *less than significant with mitigation incorporated.*

Mitigation Measures: Less Than Significant Impact with Mitigation Incorporated.

Based on the analysis and information provided herein, implementation of Mitigation Measures CUL-1 through and CUL-3 as specified in Item V Cultural Resources, would mitigate impacts *to less than significant*.

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

Mitigation Measures for Tribal Cultural Resources, see CUL-1 through CUL-3

The City, as lead agency, has determined there are known tribal cultural resources located within the Project site or area. Additionally, there are known human remains buried within the Project area's vicinity, including internment of Native Americans. It is possible that discovery of previously unknown tribal cultural resources could occur. As such, Mitigation Measures CUL-1 through CUL-3 would also address potential impacts to tribal cultural resources. Therefore, based on the analysis and information provided herein, implementation of Mitigation Measures CUL-1 through CUL-3 would mitigate impacts *to less than significant*.

Cumulative Impacts: Less than Significant with Mitigation.

The cumulative impact area is limited to lands within the Tule River Indian Tribe reservation area. The impacts of development of the proposed Project on tribal cultural resources would be site specific, and cumulative impacts would occur when a series of actions leads to the loss of a substantial type of site or other tribal cultural resource. As previously discussed, impacts to tribal cultural resources (and historical resources, archaeological resources, and human remains) identified within the areas of potential development in the MND Study Area would be less than significant. Existing federal, state, and Tribal laws, regulations, goals, policies, and/or actions described in this resource Item would protect tribal cultural resources in the Project area (specifically, within the Tule River Indian Tribe Reservation). Continued compliance with these regulations substantially decreases potential impacts to tribal cultural resources (and historical resources, archaeological resources, and human remains) to the maximum extent practicable. As such, based on the analysis and information provided herein, the Project would

result in a *less than significant impact with mitigation measures* that would be implemented as applicable.

XIX. UTILITIES AND SERVICE SYSTEMS

Would the Project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less than Significant Impact	No Impact
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 relation of which could cause significant environmental effects?	☐	☐	☐	☑
b) Have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☐	☑
c) Result in a determination by the wastewater treatment provider which serves or may serve the Project that it has adequate capacity to serve the Project's Projected demand in addition to the provider's existing commitments?	☐	☐	☐	☑
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☐	☑
e) Comply with Federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☐	

Environmental Setting

As noted previously, the Project is entirely within the Tule River Reservations. As noted earlier, the Project is predominantly surrounded by a mix of existing public uses such as the Justice Center, Elders Center, Fire Department, Public Works Department and scattered residential uses to the south; and Tribal Administration, Housing Authority, Health Center, Gymnasium, an Elementary School, Day Care Facility, and scattered residential uses to the north. The Project's length is located near the Village area where Tribe members can access the uses noted earlier. Scattered urban-type uses as described earlier are generally adjacent to Indian Reservation Drive north of

the river (where the majority of the Project will occur). The Project also includes areas along South Reservation Road south of the river (see Figure 2-3) where the proposed Project site is along a naturally formed valley of the South Fork of the Tule River (Tule River). Generally, the topography of this area is relatively uneven-to-relatively flat adjacent to the river, with hillsides rising east of Indian Reservation Drive. Areas within approximately 0.25 miles of the Project site include scattered residences spread within hills. Generally, the undeveloped hillsides of the Sierra Nevada Mountains dominate the immediate surrounding areas. In summary, this resource discussion describes and analyzes the potential impacts to the utilities and service system; specifically, water supply, wastewater treatment, stormwater drainage, water supply, landfill capacity, and solid waste disposal, as applicable. However, as previously noted, the nature of the Project can be summarized as pedestrian safety enhancements and pedestrian bridges, sidewalks, and paths that encourage active walking and cycling.

Water

The Tule River Tribe produces its water supply from groundwater and from flows from the Tule river which are then purified. The Tribe distributes it to its residential, commercial, and institutional customers. As noted in the Tribe's July 2025 News website, "PWD [Public Works Department] operates and maintains 2 separate water systems: The Main Water System; Tule River main: PWSID 0906005047 and Apple Valley Water system; Tule River Apple Valley (PWSID 090605074). Both systems contain miles of underground piping, water wells, pumps, tanks and service connections. The three systems service the Community Adminstrative offices, the Judicial Building, the Health Clinic, the School and Day Care. The daily demand is 200,000 gallons per day". (Vol. 06 Newsletter, page 6 at: https://tulerivertribe-nsn.gov/news/#) However, as noted previously, the nature of the Project can be summarized as pedestrian safety enhancements and pedestrian bridges, sidewalks, and paths that encourage active walking and cycling. As such, it is noted that the Project would not use any of the local water supply.

Sewer Collection System/Wastewater Treatment Plant (WWTP)

The Tribe operates and maintains the sewer collection system and wastewater treatment plant (WWTP). As noted in the Tribe's Public Works Department website (see: https://tulerivertribe-nsn.gov/departments/publicworks/), "Our Water Technicians Repair the Water Distribution Systems which consists of several miles of underground pipeline, several water storage tanks, and all service line connections, our WTP and WWTP are checked several times daily to ensure water quality and distribution flows, the quality of our water from the treatment plant and wells are tested as directed by the EPA by our State certified Water Technicians. Samples are taken to BSK and Porterville Laboratories to ensure water quality, these results are then sent to EPA for review. Our operators Maintain and Operate the Communities 70,000 Gal. Per Day WWTP Located on Chimney Road, as well as the 33,000-35,000 Gal. Per Day WWTP which is adjacent to the [former] Casino." However, as noted previously, the nature of the Project can be summarized as pedestrian safety enhancements and pedestrian bridges, sidewalks, and

paths that encourage active walking and cycling. As such, it is noted that the Project would not generate any sewerage or require wastewater treatment.

Solid Waste

Solid Waste Disposal and Waste Reduction program

As noted in the Tribe's Environmental Department's website, "At the community solid waste transfer station we promote waste reduction with the recycling of glass, plastic, cardboard, office paper and newspaper. We promote proper waste disposal of various hazardous waste items that should not be deposited into landfills. The Tribal community plays an active role in recycling as we provide amenities for waste reduction at community events, gatherings, and various government offices." (see: https://tulerivertribe-nsn.gov/enviromental/). However, as noted previously, the nature of the Project can be summarized as pedestrian safety enhancements and pedestrian bridges, sidewalks, and paths that encourage active walking and cycling. As such, it is noted that the Project would not generate any solid outside of typical construction-related waste for this type of project.

Electric Power: Southern California Edison (SCE) provides electricity to the Tule River Reservation. However, as noted previously, the nature of the Project can be summarized as pedestrian safety enhancements and pedestrian bridges, sidewalks, and paths that encourage active walking and cycling. As such, it is noted that the Project would not use any electric power outside of typical construction-related needs.

Regulatory Setting

Drinking Water

Federal

Federal Safe Drinking Water Act

The Safe Drinking Water Act, the principal federal law intended to ensure safe drinking water to the public, was enacted in 1974 and has been amended several times since it came into law. This Act authorizes the United States Environmental Protection Agency (USEPA) to set national standards for drinking water, called the National Primary Drinking Water Regulations, to protect against both naturally occurring and man-made contaminants. These standards set enforceable maximum contaminant levels in drinking water and require all water providers in the United States to treat water to remove contaminants, except for private wells serving fewer than 25 people. In California, the State Water Resources Control Board (SWRCB) conducts most enforcement activities. If a water system does not meet standards, it is the water supplier's responsibility to notify its customers.

America's Water Infrastructure Act (AWIA) of 2018

AWIA, signed into law on October 23, 2018, authorizes federal funding for water infrastructure projects, expands water storage capabilities, assists local communities in complying with the Safe Drinking Water Act and Clean Water Act (CWA), reduces flooding risks for rural, western, and coastal communities, and addresses significant water infrastructure needs in tribal communities. AWIA requires that drinking water systems that serve more than 3,300 people develop or update risk assessments and emergency response plans (ERPs). Risk assessments and ERPs must be certified by the USEPA within the deadline specified by the AWIA. However, as the Tule River Reservation has less than 3,300 people, the AWIA does not apply.

State

Porter-Cologne Water Quality Control Act

The Porter-Cologne Water Quality Act (Water Code sections 13000 et seq.), passed in California in 1969 and amended in 2013, is the basic water quality control law for California. Under this Act the SWRCB has authority over State water rights and water quality policy. This Act divided the State into nine regional basins, each under the jurisdiction of a Regional Water Quality Control Board (RWQCB) to oversee water quality on a day-to-day basis at the local and regional levels. RWQCBs engage in various water quality functions in their respective regions and regulate all pollutant or nuisance discharges that may affect either surface water or groundwater.

California Senate Bills (SBs) 610 and 221

SBs 610 and SB 221 were amended in 2001 to assure coordination between the local water and land use decisions to confirm that California cities and communities are provided with an adequate water supply. Specific projects are required to prepare a Water Supply Assessment (WSA). The WSA is composed of information regarding existing and forecasted water demands, as well as information pertaining to available water supplies for the new development. The Tule River Tribe does not meet the housing, business, commercial, hotel, industrial, or mixed-use hotel thresholds required to prepare a WSA:

Sustainable Groundwater Management Act of 2014

On September 16, 2014, a three-bill legislative package was signed into law, composed of AB 1739, SB 1168, and SB 1319, collectively known as the Sustainable Groundwater Management Act (SGMA). The Governor's signing message states "a central feature of these bills is the recognition that groundwater management in California is best accomplished locally." Under SGMA, in groundwater basins that are designated as medium and high priority, local public agencies and groundwater sustainability agencies (GSAs) must assess conditions in their local groundwater basins and then prepare groundwater sustainability plans (GSPs). As noted in the Eastern Tule Groundwater Sustainability Plan (ETGSA), "There is no significant presence of tribal

lands within the ETGSA. However, the reservation of the Tule River Tribe of California (Tule River Tribe) resides in the Sierra Nevada foothills northeast of the ETGSA and the Tule River Tribe does maintain and own several land holdings and facilities within ETGSA." (ETGSA, Section 2.4.4 Tribal Lands within Plan Area, page 2-4 at: https://drive.google.com/file/d/1Oit9kye2D8Hvp2LBQsVQaITor7Pttdwv/view).

California Plumbing Code

The California Plumbing Code was adopted as part of the California Building Code (CBC) and specifies technical standards of design, materials, workmanship, and maintenance for plumbing systems. The CBC is updated on a three-year cycle; the latest edition is dated 2022. One of the purposes of the plumbing code is to prevent conflicting plumbing codes within local jurisdictions. Among many topics covered in the code are water fixtures, potable and non-potable water systems, and recycled water systems.

Regional/Local

None that apply to the Project.

Wastewater

Federal

Clean Water Act

The Clean Water Act (CWA) of 1972 regulates the discharge of pollutants into watersheds throughout the nation and is implemented by the United States Environmental Protection Agency (USEPA). Under the CWA, the USEPA sets wastewater standards and made it unlawful to discharge pollutants from a point source to any navigable waters without obtaining a permit. Point sources include any conveyances, such as pipes and man-made drainage channels, from which pollutants may be discharged.

National Pollutant Discharge Elimination System (NPDES)

The NPDES permit program was established as part of the CWA to regulate municipal and industrial discharges to surface waters of the United States. Federal NPDES permit regulations have been established for broad categories of discharges, including point source municipal waste discharges and nonpoint-source stormwater runoff. NPDES permits generally identify effluent and receiving water limits on allowable connections and/or mass emissions of pollutants contained in the discharge; prohibitions on discharges not specifically allowed under the permit; and provisions that describe required actions by the discharger, including industrial pretreatment, pollution prevention, self-monitoring, and other activities. Wastewater discharge is regulated under the NPDES permit program for direct discharges into receiving

waters and by the National Pretreatment Program for indirect discharges to a sewage treatment plant.

State

State Water Resources Control Board In California (SWRCB)

The SWRCB is responsible for developing statewide water quality policy and exercises the powers delegated to the State by the federal government under the CWA. The Waste Discharge Requirements require public agencies that own or operate sanitary sewer systems to develop and implement Sewer System Management Plans (SSMPs) and report all SSOs to the SWRCB's online reporting system. The SWRCB has delegated authority to nine Regional WQCBs (RWQCB) to enforce these requirements within their regions.

Sanitary District Act of 1923

The Sanitary District Act of 1923 (Health and Safety Code Section 6400 et seq.) authorizes the formation of sanitation districts and enables the sanitation districts to construct, operate, and maintain facilities for the collection, treatment, and disposal of wastewater

Local

As noted earlier, the Tribe operates and maintains the sewer collection system and wastewater treatment plant (WWTP).

Stormwater

The regulatory framework for stormwater is described in detail in Item X, Hydrology and Water Quality, of this document. The regulatory requirements that solely apply to storm drain systems are repeated below

Federal

None that apply to the Project.

State

State Water Resources Control Board General Construction Permit

Construction activities that disturb one or more acres of land that could impact hydrologic resources must comply with the requirements of the SWRCB Construction General Permit (Order 2009-0009-DWQ), as amended by Order 2010-0014-DWQ and Order 2012-006-DWQ. Under the terms of the permit, applicants must file Permit Registration Documents (PRDs) with

the SWRCB prior to the start of construction. The PRDs include a notice of intent, risk assessment, site map, Storm Water Pollution Prevention Plan (SWPPP), annual fee, and a signed certification statement.

Applicants must also demonstrate conformance with applicable best management practices (BMPs) and prepare a SWPPP containing a site map that shows the construction site perimeter, existing and proposed buildings, lots, roadways, stormwater collection, and discharge points, general topography both before and after construction, and drainage patterns across the project site. The SWPPP must list BMPs that would be implemented to prevent soil erosion and discharge of other construction-related pollutants that could contaminate nearby water resources. Additionally, the SWPPP must contain a visual monitoring program, a chemical monitoring program for nonvisible pollutants if there is a failure of the BMPs, and a sediment monitoring plan if the site discharges directly to a water body listed on the 303(d) list for sediment. Some sites also currently require implementation of a Rain Event Action Plan. A new Construction General Permit is expected to be issued by the SWRCB in July 2022.

Regional/Local

None that apply to the Project.

Solid Waste

Federal

Resource Conservation and Recovery Act of 1976

The Resource Conservation and Recovery Act of 1976 (Title 40 of the Code of Federal Regulations), Part 258, contains regulations for municipal solid waste landfills and requires states to implement their own permitting programs incorporating the federal landfill criteria. The federal regulations address the location, operation, design (liners, leachate collection, run-off control, etc.), groundwater monitoring, and closure of landfills.

State

Sanitary District Act of 1923

The Sanitary District Act of 1923 (Health and Safety Code Section 6400 et seq.) authorizes the formation of sanitation districts and enforces the sanitation districts to construct, operate, and maintain facilities for the collection, treatment, and disposal of wastewater. This Act was amended in 1949 to allow the sanitation districts to also provide solid waste management and disposal services, including refuse transfer and resource recovery.

Local

As noted earlier, the Tribe operates a community solid waste transfer station where it promotes waste reduction with the recycling of glass, plastic, cardboard, office paper and newspaper and promotes proper waste disposal of various hazardous waste items that should not be deposited into landfills.

Discussion

a) 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 relation of which could cause significant environmental effects?

No Impact: As noted earlier, the nature of the Project can be summarized as pedestrian safety enhancements and pedestrian bridges, sidewalks, and paths that encourage active walking and cycling. As such, the Project will not require the extension of existing utility services into the Project area, including water, wastewater, stormwater drainage, electric power, and telecommunications connections.

Best management practices (BMPs), such as erosion control measures and proper waste management, will be implemented during construction-related activities to reduce potential environmental impacts. Therefore, based on the analysis and information provided herein, there would be *no impact*.

Mitigation Measures: None Required.

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

No Impact: As noted earlier, the nature of the Project can be summarized as pedestrian safety enhancements and pedestrian bridges, sidewalks, and paths that encourage active walking and cycling. As such, the Project would not lower the aquifer's groundwater table or interfere with its recharge processes as the Project would not impact water availability or supply. Therefore, there would be *no impact* on water resources.

Mitigation Measures: None Required.

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

Less Than Significant Impact: As noted earlier, the nature of the Project can be summarized as pedestrian safety enhancements and pedestrian bridges, sidewalks, and paths that encourage active walking and cycling. As noted earlier, the Tribe has its own wastewater treatment capabilities; however, the Project would not need to connect to the Tribe's current wastewater collection or treatment system. Therefore, based on the analysis and information provided herein, the impact would be *less than significant.*

Mitigation Measures: None Required.

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

No Impact: As noted earlier, the nature of the Project can be summarized as pedestrian safety enhancements and pedestrian bridges, sidewalks, and paths that encourage active walking and cycling. Also as noted earlier, the Tribe manages its own solid waste transfer station were they promote waste reduction with the recycling of glass, plastic, cardboard, office paper and newspaper. The Tribe also promotes proper waste disposal of various hazardous waste items that should not be deposited into landfills. It is noted that the Project would not generate any solid outside of typical construction-related waste for this type of project. Accordingly, the Project will comply with all applicable solid waste reduction statutes and regulations, including implementing recycling programs and encouraging waste reduction practices among residents. Therefore, based on the analysis and information provided herein, there would be *no impact.*

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

No Impact. As previously discussed, the nature of the Project can be summarized as pedestrian safety enhancements and pedestrian bridges, sidewalks, and paths that encourage active walking and cycling. As noted earlier, the Project would not generate any solid outside of typical construction-related waste for this type of project. Any waste generated by construction-related activities would cease upon completion of the Project. As such, it is unlikely that the Project would generate waste that would not allow it to comply with Federal, state, and local management and reduction statutes and regulations related to solid waste. Therefore, based on the analysis and information provided herein, the Project would result in *no impact* to this resource.

Mitigation Measures: None Required.

Mitigation Measures: None Required.

Based on the analysis and information provided herein, *no mitigation measures are required*.

Cumulative Impact: Less Than Significant

The cumulative area includes both regional and local areas. As noted earlier, the nature of the Project can be summarized as pedestrian safety enhancements and pedestrian bridges, sidewalks, and paths that encourage active walking and cycling. The Project would not impact water availability or supply; it would not impact wastewater collection or treatment; it would not impact stormwater collection or disposal; and it would not impact solid waste. As such, the Project would result in *no cumulative impact*.

XX. WILDFIRE

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

Environmental Setting

The Project is entirely within the Tule River Reservations. As noted earlier, the Project is predominantly surrounded by Tribal Administration, Housing Authority, Health Center, Gymnasium, School, Day Care Facility, and scattered residential uses to the north and a mix of existing public uses such as the Justice Center, Elders Center, Fire Department, Public Works Department and scattered residential uses to the south. The Project's length is located near the Village where Tribe members can access the uses noted earlier. Scattered urban-type uses as described earlier are generally adjacent to Indian Reservation Drive north of the river (where the majority of the Project will occur). The Project also includes areas along South Reservation Road south of the river (see Figure 2-3) where the proposed Project site is along a naturally formed valley of the South Fork of the Tule River (Tule River). Generally, the topography of this area is generally uneven adjacent to the river (with some areas leveled to accommodates structure), with hillsides rising east of Indian Reservation Drive. Areas within approximately 0.25 miles of the Project site include scattered residences spread within hills. Generally, the

undeveloped hillsides of the Sierra Nevada Mountains dominate the immediate surrounding areas. The entire Tule River Reservation lies within a Federal Responsibility Area; as such, it is outside of CalFire jurisdiction.

Regulatory Framework

Federal

Federal responsibility areas (FRA) include lands administered by the following Federal Agencies: The United States Department of Agriculture Forest Service, The United States Department of the Interior, National Park Service, Fish and Wildlife Service, Bureau of Indian Affairs, and Bureau of Land Management.

Division of Forestry and Wildland Fire Management

The Division of Forestry and Wildland Fire Management (DFWFM) oversees the National Indian Forestry and Wildland Fire Management Program which is an effort between the U.S. Department of the Interior, the Bureau of Indian Affairs, and other federal agencies and tribal governments.5 The Tule River Tribe and Reservation is a federally recognized tribe of Native Americans located on the eastern side of Tulare County. The Tule River Fire Department supports fire protection services within the Reservation. (Tule River Fire Department website at: http://fire.tulerivertribe-nsn.gov/).

The Disaster Mitigation Act of 2000 (DMA 2000)

As noted in Appendix H of the *Tulare County Multi-Jurisdictional Local Hazard Mitigation Plan (MJ-LHMP), "*Disaster Mitigation Act of 2000, also commonly known as "The 2000 Stafford Act Amendments", constitutes an effort by the Federal government to reduce the rising cost of disasters by stressing the importance of mitigation planning and disaster preparedness prior to an event. Mitigation Planning Section 322 of the Act requires local governments to develop, submit, and update hazard mitigation plans every five years in order to qualify for Hazard Mitigation Assistance (HMA) grant program funds. The County and associated jurisdictions including the Tule River Tribe must have an approved hazard mitigation plan pursuant to §201.6 in order to receive FEMA Pre-Disaster Mitigation (PDM) project grants or to receive HMA funding." (MJ-LHMP, page H-1)

State

California Building Code (CBC)

The CBC, contained in Part 2 of Title 24 of the California Code of Regulations, identifies building design standards, including those for fire safety. Typical fire safety requirements of the CBC

include the installation of fire sprinklers in all new high-rise buildings; the establishment of fire resistance standards for fire doors, building materials, and particular types of construction; and clearance of debris and vegetation within a prescribed distance from occupied structures in wildfire hazard areas.

California Fire Code (CFC)

The CFC incorporates, by adoption, the International Fire Code of the International Code Council, with California amendments. The CFC includes provisions and standards for emergency planning and preparedness, fire service features, fire protection systems, hazardous materials, fire flow requirements, and fire hydrant locations and distribution. Typical fire safety requirements include installation of sprinklers in all high-rise buildings; the establishment of fire resistance standards for fire doors, building materials, and particular types of construction; and the clearance of debris and vegetation within a prescribed distance from occupied structures in wildfire hazard areas.

The California Disaster Assistance Act of 2006 (AB 2140)

"In October 2006, the California State Legislature passed AB 2140 – the California Disaster Assistance Act - which went into effect January 1, 2007. AB 2140 limits the state's share of funding for disaster recovery projects to 75% of the recovery costs unless a local jurisdiction has complied with the legislation by incorporating a local hazard mitigation plan as part of the safety element of the general plan, at which point up to 100% of the recovery costs may be covered by the State. By incorporating the MJLHMP by reference into the Safety Element of the General Plan, the County will be considered eligible for the increased State share of public assistance reimbursement for disaster recovery projects."(MJ-LHMP, page H-1 and H-2)." As a participant in the Tulare County MJ-LHMP, the Tule River Tribe is eligible for funding from this source.

Regional

Tulare County Multi-Jurisdictional Local Hazard Mitigation Plan (MJ-LHMP)

The MJ-LHMP, adopted in 2018 and updated in 2023, includes hazard mitigation goals, strategies, and priorities, and provides a comprehensive assessment of the area's hazards and vulnerabilities. The MJ-LHMP is a guide to hazard mitigation throughout Tulare County and serves as a tool to help decision makers direct hazard mitigation activities and resources. In the context of the MJ-LHMP, mitigation is an action that reduces or eliminates long-term risk to people and property from hazards, including those occurring naturally and those caused by humans such as wildfire.

As noted in the MJ-LHMP, "The updated MJHMP complies with FEMA guidance and California OES guidelines for MJ-LHMPs. The update followed the requirements noted in the DMA of 2000 and FEMA 2013 Local Hazard Mitigation Planning Handbook.

This [2023] MJ-LHMP update involved a comprehensive review and update of each section of the 2018 MJ-LHMP, the integration of a detailed risk assessment and consequence analysis, and an assessment of the progress in evaluating, monitoring, and implementing the mitigation strategy outlined in the initial plan. The planning process provided an opportunity to review jurisdictional priorities related to hazard significance and mitigation actions, and revisions were made where applicable to the base plan. Another change in priority was the desire to engage the eight incorporated jurisdictions in the County, including annexes for the municipalities of Dinuba, Exeter, Farmersville, Lindsay, Porterville, Tulare, Visalia, Woodlake, Tule River Tribe, and the Tulare County Office of Education. While each jurisdiction participated in pervious MJ[-L]HMP updates, representatives from multiple departments representing a Local Planning Team were engaged and involved in the development of the 2023 MJ-LHMP through multiple planning workshops and numerous one-on-one work sessions (see Chapter for more information) Only the information and data still valid from the 2018 plan was carried forward as applicable into this MJ-LHMP update. The 2018 MJ-LHMP Prerequisite section was integrated into the Executive Summary of the 2023 MJ-LHMP update. Also, given the eight municipalities and the Tule River Tribe, and the Office of Education participation, significant new hazard informant was integrated into the base plan and into each annex. The 2018 MJ-LHMP assessed 14 priority hazards, including dam failure, earthquake, flooding, landslide, and wildfire. The 2023 MJ-LHMP update assessed 11 natural, human-caused, and human health hazards, including agricultural pests and disease, aquatic invasive species (AIS), cyber threats, and dam [failure]." (MJHMP, page 2-21)

In addition to the Tule River Tribe, the MJ-LHMP notes, "In the 2023 MJ-LHMP update, the following jurisdictions participated in the planning process and will be adopting the updated plan following FEMA approval. All incorporated cities in the County participated in this planning process. The individual school districts and several special districts are new to the multi-jurisdictional planning process.

Lead Jurisdiction:	Tulare County
Municipalities:	Cities of Dinuba; Exeter; Farmersville; Lindsay; Porterville; Tulare; Visalia; and Woodlake.
Tribe:	Tule River Tribe." (see MJLHMP, pages 2-23 and 2-24)

Discussion

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

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

No Impact: . As noted earlier, the nature of the Project can be summarized as pedestrian safety enhancements and pedestrian bridges, sidewalks, and paths that encourage active walking and cycling. The Project is not located within a state responsibility area or on land classified as very high fire hazard severity zone as defined by the Cal Fire. The entire Tule River Reservation is located within a federal hazard area. Moreover, the nature of the Project would not impair an adopted emergency response plan or emergency evacuation plan. Therefore, based on the analysis and information provided herein, there would be *no impact*.

Mitigation Measures: None Required.

b)Due to slope, prevailing winds, and other factors, would the Project exacerbate wildfire risks, and thereby expose Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

No Impact: As noted earlier, the nature of the Project can be summarized as pedestrian safety enhancements and pedestrian bridges, sidewalks, and paths that encourage active walking and cycling. result The Project is not located within a state responsibility area or on land classified as very high fire hazard severity zone as defined by the Cal Fire. The entire Tule River Reservation is located within a federal hazard area. The nature of the Project would not exacerbate wildfire risks and expose Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of wildfire. Therefore, based on the analysis and information provided herein, there would be *no impact*.

Mitigation Measures: None Required.

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?

No Impact: As noted earlier, the nature of the Project can be summarized as pedestrian safety enhancements and pedestrian bridges, sidewalks, and paths that encourage active walking and cycling. result The Project is not located within a state responsibility area or on land classified as very high fire hazard severity zone as defined by the Cal Fire. The entire Tule River Reservation is located within a federal hazard area. As such, the nature of the Project would not the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities). Therefore, based on the analysis and information provided herein, there would be *no impact*.

Mitigation Measures: None Required.

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

No Impact: As noted earlier, the nature of the Project can be summarized as pedestrian safety enhancements and pedestrian bridges, sidewalks, and paths that encourage active walking and cycling. result The Project is not located within a state responsibility area or on land classified as very high fire hazard severity zone as defined by the Cal Fire. The entire Tule River Reservation is located within a federal hazard area. As such, the nature of the would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire instability, or drainage changes. Therefore, based on the analysis and information provided herein, there would be *no impact*.

Mitigation Measures: None Required

Mitigation Measures: None Required.

Based on the analysis and information provided herein, *no mitigation measures are required*.

Cumulative Impact: No Impact

The cumulative area is limited to the Tule River Reservation. As noted earlier, the nature of the Project can be summarized as pedestrian safety enhancements using pedestrian bridges, sidewalks, paths, signage, etc.). As such, based on the analysis and information provided herein, cumulative wildfire-related impacts would result in *no impact*.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

Would the Project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less than Significant Impact	No Impact
a) Does the Project have the potential substantially 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?	☐	☑	☐	☐
b) Does the Project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a Project are considerable when viewed in connection with the effects of past Projects, the effects of other current Projects, and the effects of probable future Projects)?	☐	☐	☑	☐
c) Does the Project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☑	☐

Discussion

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

Less Than Significant Impact with Mitigation Incorporated: The Initial Study found the Project could potentially significantly impact on Cultural Resources, Geology and Soils

(Paleontological Resources), and Tribal Cultural Resources. However, with the implementation of previously identified Mitigation Measures CUL-1 through and CUL-3; and GEO-1 (for paleontological resources); each respective potentially significant impacts would be reduced to a less than significant level. Accordingly, the Project would not 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. No additional mitigation measures are required as impacts would be *less than significant with previously identified mitigation measures incorporated*.

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

Less Than Significant Impact: State CEQA Guidelines Section 15064(h) states that a lead agency shall consider whether the cumulative impact of a project is significant and whether the effects of the project are cumulatively considerable. The assessment of the significance of the cumulative effects of a project must, therefore, be conducted in connection with the effects of past projects, other current projects, and probable future projects. Due to the nature of the Project and consistency with environmental policies, incremental contributions to impacts are considered less than cumulatively considerable. The proposed Project would not contribute substantially to adverse cumulative conditions, or create any substantial indirect impacts (i.e., an increase in population could lead to an increased need for housing, an increase in traffic, air pollutants, etc.). Therefore, impacts would be *less than significant*.

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

Less Than Significant Impact: The analyses of environmental issues contained in this above Initial Study indicate that the Project is not expected to have a substantial impact on human beings, either directly or indirectly. Mitigation measures have been incorporated in the Project design to reduce all potentially significant impacts to less than significant, which results in a *less than significant* impact on this checklist item.

3.6 MITIGATION MONITORING AND REPORTING PROGRAM

As required by Public Resources Code Section 21081.6, subd. (a)(1), a Mitigation Monitoring and Reporting Program (MMRP) has been prepared for the Tule River Tribe Complete Streets and Two Pedestrian Bridges Project to monitor the implementation of the mitigation measures that have been adopted for the Project. This MMRP has been created based upon the findings of the Initial Study/Mitigated Negative Declaration.

The first column of the table identifies the mitigation measure. The second column names the party responsible for carrying out the required action. The third column identifies the timing of initiating the mitigation measure. The fourth column names the party ensuring that the mitigation measure is implemented. The last column will be used by the City of Porterville (and the Tule River Tribe) to ensure that the individual mitigation measures have been monitored.

Mitigation Measure	Responsible Party for Implementation	Implementation Timing	Responsible Party for Monitoring	Verification
BIOLOGICAL RESOURCES				
Mitigation Measure 4.1a (Protocol-level Surveys). Prior to the start of bridge construction, or any other project activity in the river corridor, protocol-level rare plant surveys will be conducted within the associated work areas. The surveys will be conducted when local populations of the target species are in bloom, as determined through visits to reference populations and/or consultation with local botanists. The general blooming windows are April-May for the rose-flowered larkspur, March-May for the calico monkeyflower, and March-April for the Munz's iris	Project Applicant	Prior to ground disturbance	City of Porterville (City) and Tule River Tribe (TRT)	
Mitigation Measure BIO-4.1b (Avoidance). Any individuals or populations of the rose-flowered larkspur, calico monkeyflower, or Munz's iris found during the surveys will be avoided by project activities to the maximum extent feasible. A qualified biologist will identify an appropriate construction-free zone around populations to be avoided. Construction-free zones will be delineated on the ground with temporary construction fencing and maintained for the duration of project activities.	Project Applicant	Prior to ground disturbance	CITY/TRT	
Mitigation Measure BIO-4.1c (Salvage and Relocation). If it is not feasible to avoid some or all of any rose-flowered larkspur, calico monkeyflower, or Munz's iris individuals or populations found on site, those plants that cannot be avoided will be salvaged and relocated to alternative habitat by a qualified botanist following the provisions of a salvage, relocation, and monitoring plan. Alternative habitat must be in an area	Project Applicant	Prior to ground disturbance	CITY/TRT	

protected from herbicide application, excessive grazing, and other deleterious impacts**.**				
Monarch Butterfly				
Mitigation Measure BIO-4.2a (Milkweed Survey). Prior to the start of bridge construction, a qualified biologist will survey the associated work areas for milkweed plants. The survey will be conducted at a time of year when milkweed is readily identifiable. The objective of the survey will be to tally and map all milkweed plants that could potentially be impacted by project activities.	Project Applicant	Prior to construction	CITY/TRT	
Mitigation Measure BIO-4.2b (Construction Timing). If feasible, no milkweed plants will be removed during the period when monarchs are most likely to breed in the project vicinity, March to August.	Project Applicant	Prior to construction	CITY/TRT	
Mitigation Measure BIO-4.2c (Compensatory Mitigation). Any milkweed plants that are removed by the project will be replaced at a 3:1 ratio in accordance with a revegetation plan prepared by a qualified biologist. The planting site(s) must be in similar or higher quality habitat to the habitat that was impacted, in area(s) that will not be mowed or treated with pesticides or herbicides.	Project Applicant	If plants are removed	CITY/TRT	
Crotch's bumble bee				
Mitigation Measure BIO-4.3a (Construction Timing). If feasible, all bridge construction activities will take place between October and February, outside of the period in which Crotch's bumble bee nests are typically active.	Project Applicant	Oct-Feb. when construction occurs	CITY/TRT	
Mitigation Measure BIO-4.3b (Preconstruction Surveys). If bridge construction must occur between March and September, then a qualified biologist will conduct preconstruction surveys for the Crotch's bumble bee within the associated work areas. To maximize detection, the surveys will be conducted on warm, sunny days (65-90 degrees F) when there is low wind (less than 8 mph). The surveys will be conducted by walking meandering transects through the work areas, while visually searching for bumble bees and potential nest sites. Any bumble bees that are observed will be followed and, if possible, photographed once they alight on a plant, highlighting the following features to aid identification: •Face, including cheek length •Top of the head •Banding on the abdomen •Color pattern on the thorax At any burrows or other underground features that exhibit concentrated bumble bee activity, the surveyor will monitor activity to determine nesting status.	Project Applicant	Mar.-Sept. when construction occurs	CITY/TRT	
Mitigation Measure BIO-4.3c (Avoidance). Any suspected Crotch's bumble bee nests that are discovered during the surveys will be avoided by an appropriate setback during bridge construction activities, until the biologist determines the nest is no longer active.	Project Applicant	During construction	CITY/TRT	
Western Pond Turtle				

Mitigation Measure BIO-4.4a (Preconstruction Surveys). Within 24 hours prior to the start of bridge construction at each location, a qualified biologist will conduct a preconstruction survey for western pond turtles in the associated work area.	Project Applicant	Prior to construction	CITY/TRT	
Mitigation Measure BIO-4.4b (Relocation). The biologist will capture and relocate any turtles found within the work areas during the surveys. Turtles will be relocated to suitable alternative habitat within the river corridor, well outside of work area boundaries.	Project Applicant	Prior to construction	CITY/TRT	
Mitigation Measure BIO-4.4c (Employee Education Program). Prior to the start of bridge construction, workers will receive training on western pond turtle identification and life history and the project-specific measures required for this species' protection.	Project Applicant	Prior to construction	CITY/TRT	
Mitigation Measure BIO-4.4d (Site Inspections and Turtle Avoidance/Relocation). During bridge construction, construction staff will regularly inspect the work area for western pond turtles. At a minimum, this will include (1) checking for turtles under and around any parked vehicles or equipment prior to their operation, (2) scanning the ground for turtles while operating vehicles or equipment, and (3) checking any open trenches or other excavations for trapped turtles at the beginning and end of each work day.	Project Applicant	During construction	CITY/TRT	
Mitigation Measure BIO-4.4e (Avoidance). If any turtles are observed on site while work is occurring, work in the immediate area will cease and turtles will be allowed to leave the construction zone of their own volition, if feasible. If necessary, a qualified biologist will capture and relocate such turtles as described above under Mitigation Measure 4.1.4b.	Project Applicant	During construction	CITY/TRT	
Northern California Legless Lizard				
Mitigation Measure BIO-4.5a (Preconstruction Surveys). Within 24 hours prior to the start of bridge construction at each location, a qualified biologist will conduct a preconstruction survey for northern California legless lizard in the associated work area. The survey will entail visually searching all terrestrial habitats of the work areas and will include gently raking leaf litter and turning over rocks, logs, and other features that could serve as refugia for individuals of this species.	Project Applicant	Prior to construction	CITY/TRT	
Mitigation Measure BIO-4.5b (Relocation). The biologist will capture and relocate any legless lizards found within the work areas during the surveys. Lizards will be relocated to suitable alternative habitat within the river corridor, outside of work area boundaries.	Project Applicant	Prior to construction	CITY/TRT	
Nest Birds and Raptors				
Mitigation Measure BIO-4.6a (Construction Timing). If feasible, the project will be constructed between September 1 and January 31, outside of the avian nesting season.	Project Applicant	Sept.-Mar. when construction occurs	CITY/TRT	
Mitigation Measure BIO-4.6b (Preconstruction Surveys). If construction is to occur between February 1 and August 31, a qualified biologist will conduct pre-construction surveys for active bird nests within 10 days prior to the start of any work within this period. The survey area will encompass the work		Feb 1.-Aug 31. when construction occurs	CITY/TRT	

area(s) and surrounding lands within 500 feet for nesting raptors and 250 feet for other nesting birds.				
Mitigation Measure BIO-4.6c (Avoidance of Active Nests). Should any active nests be discovered in or near proposed construction zones, the biologist will identify a suitable construction-free buffer around the nest. The buffer distance will be determined based on species biology, site-specific conditions, and the level of project-related disturbance that is anticipated near the nest(s) in question. Buffers will be identified on the ground with flagging or fencing and will be maintained until the biologist has determined that the young have fledged and are capable of foraging independently.	Project Applicant	Prior to construction	CITY/TRT	
Tree roosting bats including Pallid Bat				
Mitigation Measure BIO-4.7a (Construction Timing). If feasible, project-related tree removal will occur outside of the period between April 15 and September 30. This is the time frame within which colony-roosting bats in the vicinity generally assemble, give birth, nurse their young, and ultimately disperse.	Project Applicant	Apr. 15-Sept. 30 Prior to construction	CITY/TRT	
Mitigation Measure BIO-4.7b (Pre-construction Surveys). Within 10 days prior to the removal of any mature trees, a qualified biologist will survey these features for roosting bats. The biologist will look for individuals, guano, and staining, and will listen for bat vocalizations. If necessary, the biologist will wait for nighttime emergence of bats from roost sites.	Project Applicant	Prior to construction	CITY/TRT	
Mitigation Measure BIO-4.7c (Avoidance of Maternity Roosts). Should any active maternity bat roosts be discovered, the biologist will identify a suitable construction-free buffer around the roost(s). The buffer will be identified on the ground with flagging or fencing, and will be maintained until the biologist has determined that the nursery is no longer active.	Project Applicant	Prior to and during construction	CITY/TRT	
Mitigation Measure BIO-*4.7d* (Humane Eviction of Non-breeding Bats). If a non-breeding bat colony is found, the individuals will be humanely evicted, under the direction of a qualified biologist, to ensure that bats are not physically harmed by tree removal.	Project Applicant	Prior to and during construction	CITY/TRT	
Sensitive Natural Communities				
Mitigation Measure BIO-4.8a (Tree Survey). Prior to project construction, a qualified biologist will survey all portions of the river corridor that are proposed for direct impact. All trees and shrubs within these areas will be identified to species and mapped, and their diameter at breast height (DBH) will be recorded. At the end of construction, a qualified biologist will repeat the survey to quantify the tree and shrub removal that occurred.	Project Applicant	Prior to construction	CITY/TRT	
Mitigation Measure BIO-4.8b (Replacement Plantings). Replacement plantings will be provided as compensation for removal of any riparian trees or shrubs with a DBH of 4 inches or greater. Plantings will be installed at a ratio of 3:1 for impacted trees/shrubs with a DBH between 4 and 24 inches, and at a ratio of 10:1 for impacted trees with a DBH greater than 24 inches. All plantings will be monitored annually for a	Project Applicant	Prior to or during construction	CITY/TRT	

minimum of five years. A revegetation plan will be prepared for the project that will detail the methods for planting, irrigating, and maintaining the replacement trees and shrubs.				
CULTURAL RESOURCES/TRIBAL CULTURAL				
Mitigation Measure CUL-1 Cultural Resources Awareness Training: Before ground-disturbing activities, a qualified archaeologist shall conduct Cultural Resources Awareness Training for all construction personnel. The training shall include examples of potential cultural materials, reporting protocols, penalties for unauthorized disturbance, and procedures for immediate notification of the archaeologist. Attendance shall be documented on a sign-in sheet retained by the contractor and provided to the Tule River Indian Reservation and Tulare County upon completion of construction..	Project Applicant	Ongoing During Construction	Tule River Tribe (TRT)/City of Porterville (City)	
Mitigation Measure CUL-2 Inadvertent Discovery of Archaeological Resources: Ground-disturbing activities shall be located at least 100 feet (30 meters) from known archaeological resources. If resources are discovered, work within 100 feet (30 meters) of the find shall halt immediately, and the area shall be protected from further disturbance. The archaeologist, in consultation with a Native American representative, shall evaluate the find for significance and recommend treatment consistent with CEQA Guidelines Section 15126.4(b)(3)(C). Avoidance shall be the preferred mitigation; if avoidance is infeasible, data recovery or other appropriate treatment may be implemented. Construction shall resume only after approval by the qualified archaeologist.	Project Applicant	Ongoing During Construction	TRT/City	
MM CUL-3: Inadvertent Discovery of Human Remains: If human remains are encountered during construction, all work in the vicinity shall cease. The Tulare County Coroner shall be notified immediately. If the remains are determined to be Native American, the NAHC shall be notified in accordance with PRC Section 5097.98, and a Most Likely Descendant shall be identified. The County and the descendant shall confer to determine appropriate treatment and disposition of the remains. Construction shall not resume until approved by the County and the qualified archaeologist.	Project Applicant	Ongoing During Construction	TRT/City	
Mitigation Measure GEO-1 (Paleontological resources): If a suspected unique paleontological resource were to be discovered during construction of the Project, the following protocol shall be implemented: • The City of Porterville (City) and Tule River Tribal Representatives (Tribe) shall be notified of the discovery. Work shall cease around the find until a qualified paleontologist meeting the Society of Vertebrate Paleontology standards has evaluated the find in accordance with federal, state, and local guidelines. The applicant shall choose the qualified paleontologist subject to the approval of the City and Tribe. If the find is determined to be a unique resource, such measures may include avoidance, preservation in place, data recovery	Project Applicant	Ongoing During Construction	TRT/City	

and associated documentation, or other appropriate measures. Construction activity may continue unimpeded in other portions of the Project Site. The City and Tribe shall determine the appropriate and feasible measure(s) that will be necessary to mitigate impacts, in consideration of the measure(s) recommended by the paleontologist. Construction in the affected area shall re-commence with the approval of the City and Tribe.				
Mitigation Measure HYD-1: Prior to the issuance of any construction/grading permit and/or the commencement of any clearing, grading, or excavation, the Applicant shall submit a Notice of Intent (NOI) for discharge from the Project Site to the California State Water Resources Control Board's Storm Water Permit Unit and submit a copy of this NOI to the City/Tribe. The City/Tribe shall review the noticing documentation prior to approval of the grading permit and City monitoring staff shall inspect the Project Site during construction for compliance.	Project Applicant	Pre-Construction	City	
Mitigation Measure HYD-2: The Applicant shall require the building contractor to prepare and submit a Storm Water Pollution Prevention Plan (SWPPP) to the City 45 days prior to the start of work for approval. The contractor is responsible for understanding the State General Permit and instituting the SWPPP during construction. A SWPPP for site construction shall be developed prior to the initiation of grading and implemented for all construction activity on the Project Site in excess of one (1) acre, or where the area of disturbance is less than one acre but is part of the Project's plan of development that in total disturbs one or more acres. The SWPPP shall identify potential pollutant sources that may affect the quality of discharges to stormwater and shall include specific Best Management Practices (BMPs) to control the discharge of material from the site. The following BMPs methods shall include, but would not be limited to: • Dust control measures to ensure success of all on-site activities to control fugitive dust; • A routine monitoring plan to ensure success of all on-site erosion and sedimentation control measures; • Provisional detention basins, straw bales, erosion control blankets, mulching, silt fencing, sand bagging, and soil stabilizers shall be used; • Soil stockpiles and graded slopes shal be covered after two weeks of inactivity and 24 hours prior to and during extreme weather conditions; and, • BMPs shall be strictly followed to prevent spills and discharges of pollutants on-site, such as material storage, trash disposal, construction entrances, etc.	Project Applicant	Pre-Construction	City	
Reserved				

3.7 Supporting Information and Sources

California Air Resources Board website accessed at: https://arb.ca.gov/adam/trends/trends1.php.

California Department of Conservation (DOC), Mining Division at: https://www.arcgis.com/apps/mapviewer/index.html?url=https://gis.conservation.ca.gov/server/rest/services/MOL/MOLMines/MapServer&source=sd)

California Department of Conservation (DOC) *Farmland Mapping and Monitoring Program* (must query the website to receive information)

California Department of Conservation. CA Geological Survey https://maps.conservation.ca.gov/cgs/informationwarehouse/eqzapp/#data_s=id%3AdataSource_4-191d8e6d993-layer-25%3A5083120)

California Department of Forestry and Fire Protection (CalFire) Fire Hazard Severity Zones map at: https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones)

California Department of Toxic Substances Control's (DTSC's) at: https://www.google.com/maps/@36.0332328,-118.8449611,13z?hl=en-US&entry=ttu&g_ep=EgoyMDI1MDYxNy4wIKXMDSoASAFQAw%3D%3D)

California Energy Commission (CEC's) 2022 Total System Electric Generation summary (accessed at: https://www.energy.ca.gov/data-reports/energy-almanac/california-electricity-data/2022-total-system-electric-generation

California Governor's Office of Planning and Research (OPR) Technical Advisory on Evaluating Transportation Impacts in CEQA (December 28, 2018), pages 14 and 18, at: https://lci.ca.gov/docs/20180416-743_Technical_Advisory_4.16.18.pdf

Caltrans District 6 funded "Recommendation to Improve Pedestrian Safety on the Tule River Indian Reservation" (Sept. 2015) Safe Transportation Research & Education Center (SafeTREC) prepared by Tony Dang, Jaime Fearer, Wendy Alfsen, California Walks; Jill Cooper, UC Berkeley SafeTREC accessed at: https://safetrec.berkeley.edu/sites/default/files/tule-river-cpst-recommendations_final.pdf

California Transportation Commission, "Active Transportation Program," MULTIMODAL SYSTEM ENHANCEMENTS, ACTIVE TRANSPORTATION SYSTEM (BICYCLING AND WALKING), page 63 at: http://www.catc.ca.gov/programs/ATP.htm.

California Transportation Plan (CTP) 2050. Tribal Nations; pages 34 and 35; accessed at: https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/ctp-2050-v3-a11y.pdf

County of Tulare. Tulare County General Plan 2030 Update Background Report, pages 8-6 and 8-7 at: https://generalplan.co.tulare.ca.us/documents/GeneralPlan2010/Appendix%20B%20-%20Background%20Report.pdf)

County of Tulare. Tulare County Multi-Jurisdictional Local Hazard Mitigation Plan (MJ-LHMP) at: 2023-Tulare-County-Multi-Jurisdictional-Local-Hazard-Mitigation-Plan--Annexes.pdf

County of Tulare. Sequoia Gateway Commerce and Business Park Specific Plan DEIR (SCH No. 2015081056, page. 3.5-3. Prepared by Bert Verrips Environmental Consulting. September 2018, accessed at: https://tularecounty.ca.gov/rma/projects/planning-projects/applicant-projects/sequoia-gateway-commerce-park/); Certified and adopted by the Tulare County Board of Supervisors December 4, 2018. Resolution No. 2018-0938.

Eastern Tule Groundwater Sustainability Plan (ETGSA) Section 2.4.4 Tribal Lands within Plan Area at: https://drive.google.com/file/d/1Oit9kye2D8Hvp2LBQsVQalTor7Pttdwv/view,

GeoScienceWorld Research Article April 1, 2013; page 193 by John Wakabayashi which can be accessed at: https://pubs.geoscienceworld.org/gsa/geosphere/article/9/2/191/132574/paleochannels-stream-incision-erosion-topographic).

Tulare County Association of Governments (TCAG) 2018 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) at: https://tularecog.org/tcag/planning/rtp/rtp-20181/

Tulare County Association of Governments (TCAG) 2022 RTP/SCS, pages D-29-30 at: https://tularecog.org/tcag/planning/rtp/rtp-2022/chapter-d-action-element/

Tule River Indian Reservation ATP Plan https://tularecog.org/tcag/planning/active-transportation-planning/tule-river-indian-reservation-atp-plan/

Tulare County Association of Governments (TCAG). Active Transportation Planning. Final Report Sustainable Transportation/Circulation Element for the Tule River Comprehensive Master Plan (STCETRMP), page 16, which can be accessed at: https://drive.google.com/file/d/1eHl1QA21_cb2Bgs_WoDP9VeHoVVUX11w/view

Tule River Tribe Fire Department at: https://tulerivertribe-nsn.gov/departments/fire-deparment/.

Tule River Department of Safety, Tule River Tribal Police at: https://tulerivertribe-nsn.gov/dps-2/.

Tule River Department of Safety, TRTPD Community Service Officer Division at: https://tulerivertribe-nsn.gov/dps-2/

Tule River Tribe Environmental Department at: https://tulerivertribe-nsn.gov/enviromental/

Tule River Tribe Public Works Department at: https://tulerivertribe-nsn.gov/departments/publicworks/

Tule River Tribe, Towanits School at: https://tulerivertribe-nsn.gov/towanits/

Tule River Tribe TRTC July 2025 News Vol. 06 Newsletter. page https://tulerivertribe-nsn.gov/news/#

U.S. Department of Agriculture. Natural Resources Information A. Soils Information at: https://efotg.sc.egov.usda.gov/references/Delete/2008-8-16/Soil_Feat_Def.pdf.

U.S. Census Bureau (2023), *American Community Survey 5-year estimates* at: https://censusreporter.org/profiles/25200US4300R-tule-river-reservation/)

U.S. Federal Emergency Management Agency (FEMA) Federal Insurance Rate Map (FIRM) of Tule River Indian Reservation, 065066; 06107C1695E6 6/16/2009 at: https://hazards-fema.maps.arcgis.com/apps/webappviewer/index.html?id=8b0adb51996444d4879

338b5529aa9cd&extent=-120.22581757761441,36.77078148069618,-119.60509003855205,37.04530192606378.

U.S. Energy Information Administration at: https://www.eia.gov/state/print.php?sid=CA),

U.S. EPA 1990 Clean Air Act Amendment Summary at: https://www.epa.gov/clean-air-act-overview/1990-clean-air-act-amendment-summary

U.S. Department of Transportation (U.S. DOT) Federal Highway Administration Manual on Uniform Traffic Control Devices for Streets and Highways (MUTCD) standards, sign design details and supporting graphics (accessed at: https://mutcd.fhwa.dot.gov/index.htm)

City of Porterville
291 Main Street
Porterville, CA 93257

SECTION 4: List of Preparers
Project Title:
Tule River Tribe Complete Streets and Two Pedestrian Bridges Project

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Lead Agency

City of Porterville

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- Daniel Cervantez, City Engineer, Engineering & Project Management

List of Preparers

4Creeks Inc.

- Hector Guerra, Senior Environmental Planner
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The following individuals and agencies contributed to this Initial Study/Mitigated Negative Declaration:

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Appendix A

HRA and CalEEMod Report

Technical Report

Health Risk Assessment
For California Environmental Quality Act (CEQA)

Project Name:

Tule Active Transportation Plan Phase I
Tule River Reservation, near Porterville, Tulare County, California

Prepared for:

4Creeks, Inc.
Visalia, CA

Author:

Core Environmental Consulting
Clovis, CA

Lead Agency:

City of Porterville

Date of Preparation:

March 2026

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1 Executive Summary

This technical report has been prepared to summarize the background, methodology, and results of a Health Risk Assessment (HRA) for the Tule River Active Transportation Program (ATP) Phase I Project (Project). The HRA evaluates the potential significance of impacts to nearby sensitive receptors from Toxic Air Contaminant (TAC) emissions generated during Project construction. The Project does not include new operational sources of TAC; therefore, this assessment focuses exclusively on construction-related diesel particulate matter (DPM).

The Project consists of pedestrian, bicycle, and safety improvements along the Reservation Road corridor within the Tule River Reservation, including the Village Corridor Crossing improvements, construction of a new pedestrian bridge, and replacement of the existing swinging pedestrian bridge. All improvements are conceptual and based on the best available planning-level materials provided by 4Creeks.

The Project is subject to the California Environmental Quality Act (CEQA), with the City of Porterville serving as the Lead Agency. This HRA was prepared to support the Initial Study and permitting.

The San Joaquin Valley Air Pollution Control District (SJVAPCD) is responsible for developing and enforcing air quality regulations within the San Joaquin Valley Air Basin (SJVAB), where the Project is located. Under CEQA, SJVAPCD serves as a Responsible Agency for projects requiring air quality review and provides guidance for evaluating TAC emissions and health risk. SJVAPCD's *Guidance for Assessing and Mitigating Air Quality Impacts* (GAMAQI)[1] outlines the framework for determining whether a project would expose sensitive receptors to substantial pollutant concentrations.

This HRA was prepared in accordance with the Office of Environmental Health Hazard Assessment (OEHHA) *Guidance Manual for Preparation of Health Risk Assessments*[2], SJVAPCD Policy *APR 1906 – Framework for Performing Health Risk Assessments and Guidance for Air Dispersion Modeling*[3], and the SJVAPCD GAMAQI. Construction DPM emissions were modeled using the U.S. EPA American Meteorological Society/EPA Regulatory Model (AERMOD), and health risks were calculated using the California Air Resources Board (CARB) Hotspots Analysis and Reporting Program (HARP2) Air Dispersion Modeling and Risk Tool (ADMRT).

The maximum residential cancer risk from construction-related diesel particulate matter emissions is below the SJVAPCD significance threshold of 20 in one million. Therefore, construction of the Project would not expose sensitive receptors to substantial pollutant concentrations, and construction TAC impacts would be ***less than significant***.

An Ambient Air Quality Analysis (AAQA) screening was also performed. The Project is not subject to SJVAPCD Rule 9510 (Indirect Source Review) and is thus exempt from further AAQA. No localized exceedances of National or California Ambient Air Quality Standards are expected and related impacts ***would be less than significant***.

[1] (San Joaquin Valley Air Pollution Control District, 2015)
[2] (Office of Environmental Health Hazard Asssessment, 2015)
[3] (San Joaquin Valley Air Pollution Control District, 2020)

Brief summaries of construction air quality and greenhouse gas (GHG) emissions are included for informational purposes. These sections provide quantified emissions results but do not include the broader regulatory background, setting, or full significance determinations that would be part of a standalone AQ/GHG technical study.

2 Project Description

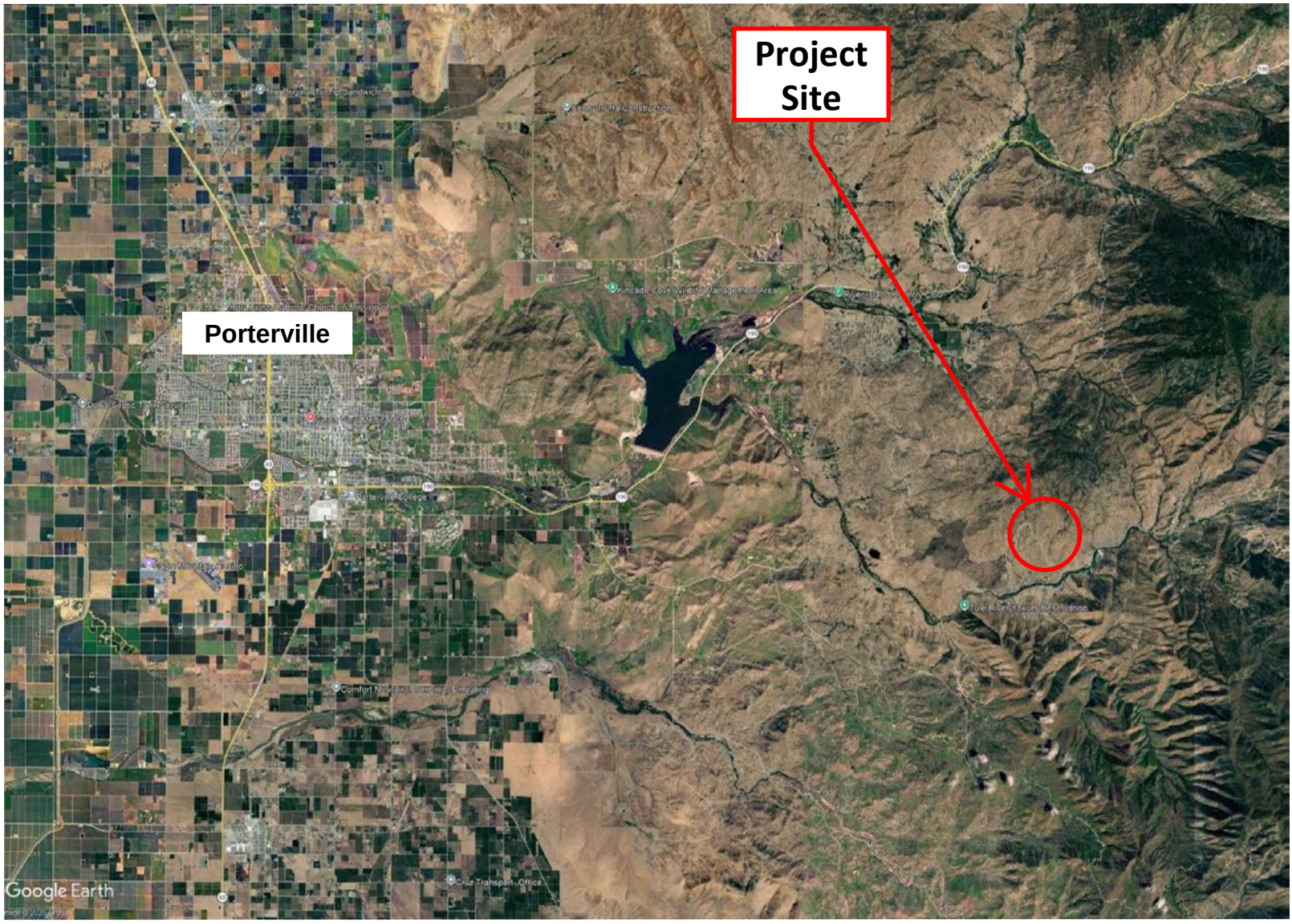
The Tule River Active Transportation Program (ATP) Phase I Project ("Project") consists of pedestrian, bicycle, and safety improvements along the Reservation Road corridor within the Tule River Reservation. The Project includes three primary components: (1) Village Corridor Crossing improvements along North Reservation Road, (2) construction of a new pedestrian bridge connecting Cow Mountain Road to the Justice Center, and (3) replacement of the existing swinging pedestrian bridge over the Tule River.

The Village Corridor Crossing component includes a Class I shared-use path, approximately 3,765 square feet of new sidewalk, seven accessible curb ramps, two streetlights, eight solar-powered Rectangular Rapid Flashing Beacons (RRFBs) at four locations, two raised pedestrian crossings, reconfiguration of back-in angled parking, landscaping and irrigation, signing, pavement delineation, and associated site improvements.

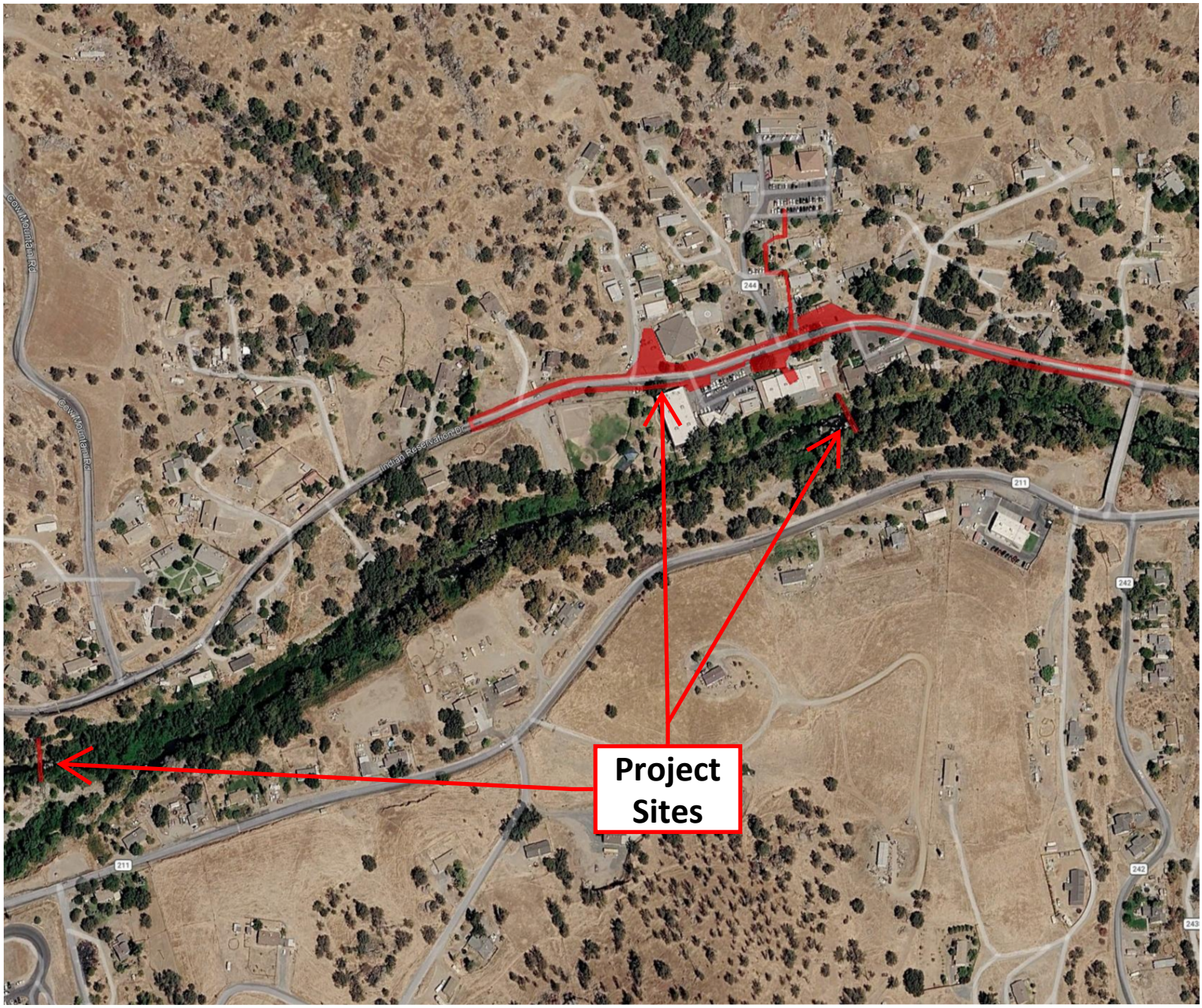
The new pedestrian bridge component includes construction of a new pedestrian bridge spanning the Tule River, with associated approach pathways, grading, and construction access. The swinging bridge replacement component includes removal of the existing pedestrian bridge and construction of a new bridge in the same general location, with associated approach improvements.

All improvements are conceptual and based on the best available planning-level materials provided by 4Creeks, including the ATP Tule River Phase I figures. The Project does not include new operational sources of toxic air contaminants (TAC). Therefore, this technical report evaluates construction-only TAC emissions and associated health risk.

For conservative modeling, construction was assumed to begin June 1, 2026 and continue for the default schedule predicted by the California Emissions Estimator Model (CalEEMod) analysis.
A Vicinity Map and Approximate Construction Footprints are provided as Figures 1 and 2, respectively.



CORE ENVIRONMENTAL CONSULTING Core Environmental Consulting Clovis, CA 93612 (559) 202-3941	PROJECT NAME **Tule ATP Phase 1**	DATE **3/12/26**	SCALE **NOT TO SCALE**	**FIGURE 1** **VICINITY MAP**
	PROJECT NUMBER **24017**	DRAWN BY **JM**	LAT/LONG **36.026552, -118.798181**	



CORE ENVIRONMENTAL CONSULTING Core Environmental Consulting Clovis, CA 93612 (559) 202-3941	PROJECT NAME **Tule ATP Phase 1**	DATE **3/12/26**	SCALE **NOT TO SCALE**	**FIGURE 2** **CONSTRUCTION FOOTPRINTS**
	PROJECT NUMBER **24017**	DRAWN BY **JM**	LAT/LONG **36.026552, -118.798181**	

3 Health Risk Assessment Setting

3.1 San Joaquin Valley Air Pollution Control District

The Project is located in the San Joaquin Valley Air Basin (SJVAB), which consists of eight counties: Fresno, Kern (western and central), Kings, Madera, Merced, San Joaquin, Stanislaus, and Tulare. Air pollution in the SJVAB can be attributed to both human-related (anthropogenic) and natural (biogenic) activities that produce emissions.

Area and stationary sources within SJVAB are under the jurisdiction of the San Joaquin Valley Air Pollution Control District (SJVAPCD). An overview of important air pollutants, and SJVPACD roles in controlling them, is provided in the SJVAPCD *Guidance for Assessing and Mitigating Air Quality Impacts*[4] (GAMAQI), along with in-depth discussions on the meteorology and geography that contribute to unhealthy levels of air pollution. This HRA focuses on Toxic Air Contaminants (TAC).

Toxic Air Contaminants (TAC), as defined by the California Health & Safety Code (CH&SC) §44321, are listed in Appendices AI and AII in AB 2588 Air Toxic "Hot Spots" and Assessment Act's Emissions Inventory Criteria and Guideline Regulation document. Potential health impacts from TACs are generally categorized into two groups: carcinogenic (cancer causing) effects and non-carcinogenic (non-cancer-causing) effects.

The non-carcinogenic effects can be further divided into long-term (chronic) health effects such as birth defects, neurological damage, or genetic damage; and short- term (acute) effects such as eye irritation, respiratory irritation, and nausea. The California TAC list identifies about 700 plus pollutants. Carcinogenic and/or non-carcinogenic toxicity criteria have been established for a subset of these pollutants by OEHHA, as required by CH&SC §44360. TACs used in determining the potential exposure to the public should not be confused with the 189 Hazardous Air Pollutants (HAP) listed in the Clean Air Act.

SJVAPCD oversees the assessment of health risk associated with TAC emissions from new development in the SJVAB. SJVAPCD lays out a basic framework for understanding and assessing health risk, under CEQA, in the GAMAQI.

The location of a development project is a major factor in determining whether the project will result in localized air quality impacts. The potential for adverse air quality impacts increases as the distance between the source of emissions and receptors decreases. Receptors include sensitive receptors and worker receptors. Sensitive receptors refer to those segments of the population most susceptible to poor air quality (i.e., children, the elderly, and those with pre-existing serious health problems affected by air quality). Land uses where sensitive individuals are most likely to spend time include schools and schoolyards, parks and playgrounds, daycare centers, nursing homes, hospitals, and residential communities (these sensitive land uses may also be referred to as sensitive receptors). Worker receptors refer to employees and locations where people work. Impacts on sensitive receptors are of particular concern, because they are the people most vulnerable to the effects of air pollution.

[4] (San Joaquin Valley Air Pollution Control District, 2015)

From a health risk perspective there are two types of land use projects that have the potential to cause long-term public health risk impacts:

Type A Projects: Land use projects that will place new toxic sources in the vicinity of existing receptors.

Type B Projects: Land use projects that will place new receptors in the vicinity of existing toxics sources.

Projects of either type must be assessed to determine whether the resulting health risk to sensitive receptors would exceed SJVAPCD established thresholds of significance for carcinogenic, non-carcinogenic acute, and non-carcinogenic chronic risk.

The OEHHA *Risk Assessment Guidelines* are the standards for estimating health risks. OEHHA is responsible for developing and providing toxicological and medical information relevant to decisions involving public health to state and local government agencies. Historically, state laws have required OEHHA to develop Risk Assessment Guidelines for estimating health risk associated with various sources of air pollution. Furthermore, the Children's Environmental Health Protection Act (SB 25, Escutia, 1999) requires OEHHA to biennially review risk assessment methods for air toxics, and related information, to ensure that they adequately protect infants and children.

The SJVAPCD risk management policy works in conjunction with the OEHHA *Risk Assessment Guidelines*. The SJVAPCD risk management policy further clarifies and provides guidance on the appropriate options to use, such as a longer exposure period and more conservative air dispersion modeling.

SJVAPCD staff members are considered leading statewide experts in the field of health risk assessment and have developed significant resources from guidance documents to database tools to assist other agencies, consultants, and regulated sources. Therefore, the SJVAPCD concludes that use of its risk management policy and the OEHHA *Risk Assessment Guidelines* is appropriate in determining significance within the environmental review process.

3.2 Diesel Particulate Matter (DPM)

Construction activities associated with the Project would generate emissions of diesel particulate matter (DPM) from the use of off-road diesel-fueled equipment and on-road diesel trucks. DPM has been identified as a toxic air contaminant by the California Air Resources Board (CARB) based on its potential to contribute to both carcinogenic and non-carcinogenic health effects. OEHHA has evaluated numerous human epidemiological studies on diesel exhaust exposure, with long-term occupational studies showing increased relative risks of lung cancer among exposed populations. These studies support a causal relationship between long-term diesel exhaust exposure and cancer risk.

In addition to carcinogenic effects, long-term non-cancer health effects have been associated with chronic exposure to diesel exhaust, including increased incidence of cough, phlegm, and chronic bronchitis, as well as reductions in pulmonary function. Short-term exposures have been linked to acute respiratory symptoms such as cough, wheezing, chest tightness, and eye and nasal irritation. These findings underscore the importance of evaluating potential exposures to DPM during construction activities, particularly for nearby sensitive receptors.

Because the Project does not include any operational sources of toxic air contaminants—such as gasoline dispensing, diesel fueling, industrial processes, or stationary equipment—construction DPM is the **only** TAC source evaluated in this Health Risk Assessment. Accordingly, this HRA focuses on estimating potential cancer and non-cancer risks associated with short-term construction emissions of DPM, consistent with OEHHA and SJVAPCD guidance.

3.3 Ambient Air Quality

The SJVAPCD Guidance for Assessing and Mitigating Air Quality Impacts (GAMAQI) provides the framework for evaluating potential air quality impacts under CEQA. The GAMAQI includes detailed discussions of regional meteorology, geography, and pollutant sources within the San Joaquin Valley Air Basin (SJVAB), as well as the regulatory context for criteria pollutants. This technical report provides only a brief overview of ambient air quality considerations relevant to the Project; the reader is referred to the GAMAQI for additional background.

The United States Environmental Protection Agency (USEPA) has established National Ambient Air Quality Standards (NAAQS) for six criteria pollutants, and the California Air Resources Board (CARB) has established California Ambient Air Quality Standards (CAAQS) for these and several additional pollutants. Under SJVAPCD guidance, projects must be evaluated for their potential to cause or contribute to localized exceedances of these standards.

SJVAPCD requires an Ambient Air Quality Analysis (AAQA) when project-related on-site emissions of any criteria pollutant exceed the District's 100-pound-per-day screening threshold after implementation of all enforceable mitigation measures. An AAQA uses air dispersion modeling to determine whether project emissions would cause or contribute to a violation of the applicable AAQS. For this Project, maximum daily construction emissions were compared to the 100-pound-per-day screening threshold to determine whether a full AAQA is required.

4 Thresholds of Significance

4.1 HRA Thresholds

This HRA focuses on answering the following question from the Air Quality section of Appendix G in the *CEQA Guidelines*[5]:

3. Would the Project expose sensitive receptors to substantial pollutant concentrations?

The *CEQA Guidelines* state that, where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make a significance determination.

SJVAPCD has established the following thresholds of significance for risk exposure to TAC:

Table 1 SJVPACD Thresholds of Significance – Toxic Air Contaminants

CARCINOGENS	Maximally Exposed Individual risk equals or exceeds 20 in one million
NON CARCINOGENS	**Acute**: Hazard Index equals or exceeds 1 for the Maximally Exposed Individual
	Chronic: Hazard Index equals or exceeds 1 for the Maximally Exposed Individual
Source: (San Joaquin Valley Air Pollution Control District, 2015)	

Therefore, if the calculated risk exposure from Project TAC emissions is below the SJVAPCD thresholds of significance, it can be concluded that the Project would not expose sensitive receptors to substantial pollutant concentrations and this impact would be considered less than significant under CEQA.

4.2 Ambient Air Quality Thresholds

The thresholds of significance for ambient air quality are based on the NAAQS and CAAQS. A project would be considered to have a significant impact if its emissions are predicted to cause or contribute to a violation of an ambient air quality standard by creating a localized exceedance of any of the CAAQS or any of the NAAQS and if available the associated Significant Impact Level (SIL).

The SJVAPCD Rule 9510 (Indirect Source Review) applicability thresholds, which are far more conservative than the criteria pollutant significance thresholds or the AAQA applicability threshold, can be used to screen out development projects subject to CEQA. Projects below ISR applicability thresholds (i.e., “small projects”) would be expected to not violate any air quality standards or contribute substantially to an existing or projected air quality violation and will not exceed the thresholds of significance for ambient air quality. In this case, SJVAPCD concludes no emission calculation is needed and no ambient air quality analysis is required. For projects equal to or above the applicability

[5] (Association of Environmental Professionals, 2025)

thresholds, the District recommends that emissions from the project be quantified to determine if an AAQA is needed.

If maximum daily onsite emissions of all criteria pollutants, during construction and operation, are below 100 pounds per day, then the Project would not cause a localized exceedance of NAAQS or CAAQS, no further AAQA is required, and the associated impact would be less than significant.

5 Methodology

5.1 HRA Methodology

The potential health risks associated with toxic air contaminant (TAC) emissions from the Project were evaluated in accordance with the Office of Environmental Health Hazard Assessment (OEHHA) *Guidance Manual for Preparation of Health Risk Assessments* (2015)[6], the San Joaquin Valley Air Pollution Control District (SJVAPCD) Policy APR 1906 – *Framework for Performing Health Risk Assessments and Guidance for Air Dispersion Modeling*[7], and the SJVAPCD *Guidance for Assessing and Mitigating Air Quality Impacts* (GAMAQI)[8]. These documents provide the regulatory framework for identifying TAC sources, estimating emissions, modeling dispersion, and calculating cancer and non-cancer health risks.

Because the Project does not include any operational sources of TAC, construction diesel particulate matter (DPM) is the only TAC source requiring quantitative evaluation. DPM is the particulate component of diesel exhaust and has been identified as a TAC by the California Air Resources Board (CARB) based on its carcinogenic and non-carcinogenic health effects. Long-term epidemiological studies have demonstrated increased lung cancer risks among populations with chronic occupational exposure to diesel exhaust, and both acute and chronic respiratory symptoms have been associated with short-term exposures. Construction-related DPM emissions were therefore included in the quantitative analysis described below.

Other potential TAC sources were evaluated and determined not to be present. The Project does not include gasoline dispensing, charbroilers, industrial equipment, diesel fueling, or any other stationary or area sources that would generate TAC emissions requiring quantitative HRA modeling under SJVAPCD guidance. Construction activities are the only source of TAC emissions, and all diesel particulate matter (DPM) associated with construction equipment and construction-related truck activity is captured within the CalEEMod construction emissions. The Project would not generate any new operational diesel demand, new vehicle trips, or any other operational TAC-emitting activities. Accordingly, construction DPM is the only TAC source requiring quantitative evaluation in this HRA.

Accordingly, the HRA focuses exclusively on quantifying potential cancer and non-cancer risks associated with construction DPM emissions. The analysis consisted of the following steps:

1. **Estimated TAC Emissions.** Construction emissions were estimated using the latest version of the California Emissions Estimator Model (CalEEMod). Results are provided in Appendix A. SJVAPCD considers exhaust particulate matter 10 microns and smaller (PM_{10} exhaust) to be a reasonable surrogate for DPM. The maximum (worst-year) annual DPM emissions were used for subsequent modeling. Project-specific construction details were based on the best available information provided by 4Creeks. Where project-specific information was not available, CalEEMod default assumptions were used.

[6] (Office of Environmental Health Hazard Asssessment, 2015)
[7] (San Joaquin Valley Air Pollution Control District, 2020)
[8] (San Joaquin Valley Air Pollution Control District, 2015)

Because construction activities occur across three distinct project areas, total annual DPM emissions from the single CalEEMod run were allocated proportionately to each area based on relative disturbance acreage for use in HARP2 ADMRT. Allocation calculations are provided in Appendix B.

2. **Modeled Air Dispersion.** The U.S. Environmental Protection Agency (U.S. EPA) American Meteorological Society/EPA Regulatory Model (AERMOD) was used to model annual average downwind concentrations of DPM at nearby receptors. A normalized emission rate of one gram per second was applied to the construction area source, and meteorological data were obtained from SJVAPCD. Terrain was incorporated using AERMOD's WebGIS preprocessing tool. The construction footprints were modeled as an area source based on the Project disturbance limits (see **Figure 2**). Receptors were placed at the nearest residential and worker locations surrounding the Project site. Consistent with OEHHA and SJVAPCD guidance, indoor worker receptors within the construction zone were excluded because they are regulated under OSHA and are not considered sensitive receptors for CEQA purposes.

3. **Calculated Risk.** Normalized downwind concentrations from AERMOD were imported into the CARB Hotspots Analysis and Reporting Program (HARP2) Air Dispersion Modeling and Risk Tool (ADMRT). These concentrations were combined with the estimated DPM emissions to calculate ground-level TAC concentrations at each receptor. Cancer risk and chronic hazard index (HI) were calculated for all receptors using OEHHA-recommended exposure pathways and SJVAPCD-recommended conservative parameters. OEHHA has not established acute or 8-hour chronic Reference Exposure Levels (RELs) for DPM; therefore, acute and 8-hour chronic HI values were not calculated. Because construction DPM is the only TAC source associated with the Project, no operational TAC risks were calculated. Total Project risk is therefore equal to construction risk.

SJVAPCD recommendations were followed throughout both the AERMOD and HARP2 ADMRT analyses. Results are provided in Appendix B, along with receptor maps. Modeling files will be made available to reviewing agencies upon request.

5.2 AAQA Methodology

The SJVAPCD Guidance for Assessing and Mitigating Air Quality Impacts (GAMAQI) outlines a stepwise process for determining whether a project requires a full Ambient Air Quality Analysis (AAQA). The first step is to determine whether the project is subject to SJVAPCD Rule 9510 (Indirect Source Review, ISR). If a project is exempt from ISR, it proceeds directly to the AAQA screening step, which evaluates maximum daily onsite emissions against the District's 100-pound-per-day screening threshold.

Rule 9510 applicability was evaluated based on the definitions, applicability criteria, and exemptions provided in Sections 2.0 through 4.0 of the rule. Rule 9510 Section 2.4 establishes that transportation or transit development projects are subject to ISR only if construction exhaust emissions equal or exceed 2.0 tons of NOx or 2.0 tons of PM10. Based on the construction emissions modeling, total construction exhaust emissions of NOx and PM10 are below the Rule 9510 applicability thresholds (for transportation projects) of 2.0 tons each. These results confirm that the Project does not meet the applicability criteria in Rule 9510 Section 2.4.

Rule 9510 Section 3.13 defines a development project as one that results in the construction of a new building, facility, or structure, or the reconstruction of such structures for the purpose of increasing capacity or activity. The Project does not include buildings, facilities, or structures as defined in the rule, nor does it increase the capacity or activity of any existing facility. As such, the Project does not meet the definition of a development project subject to ISR.

Rule 9510 Section 3.18 defines an indirect source as a facility or installation that attracts or generates mobile-source activity resulting in emissions of pollutants for which there is a state ambient standard. The Project does not generate new vehicle demand or attract new mobile-source activity; rather, it provides safety and accessibility improvements for existing pedestrian and bicycle travel. No new operational vehicle trips or diesel demand would be generated by the Project. Therefore, the Project does not constitute an indirect source under Rule 9510.

Rule 9510 Section 4.4.2 provides an exemption for transportation development projects that consist solely of modifications to existing roads subject to District Rule 8061 and that are not intended to increase single-occupancy vehicle capacity. The Project consists of pedestrian and bicycle safety improvements, sidewalk infill, curb ramps, and related active transportation elements. These improvements do not increase roadway capacity, do not induce additional vehicle trips, and do not modify the roadway in a manner that would increase single-occupancy vehicle throughput. Therefore, the Project meets the exemption criteria in Section 4.4.2.1.

Based on these considerations, the Project is exempt from SJVAPCD Rule 9510. Because the Project is exempt from ISR, the AAQA process concludes at this step. The subsequent AAQA steps—maximum daily onsite screening against the 100-pound-per-day threshold, onsite plus one-quarter-mile mobile-source adjustments, air dispersion modeling, and localized concentration analysis—are not required for this Project.

6 Potential Impacts

6.1 Health Risk Assessment Impacts

The Health Risk Assessment (HRA) evaluated toxic air contaminant (TAC) emissions associated with Project construction. As described in the HRA Methodology, construction diesel particulate matter (DPM) is the only TAC source associated with the Project. The Project does not include any operational TAC sources, such as gasoline dispensing, diesel fueling, industrial equipment, charbroilers, or other stationary or mobile TAC-emitting activities. No new operational diesel demand or vehicle trips would occur.

Construction activities would generate DPM emissions from off-road diesel-fueled equipment and on-road diesel vehicles. Construction DPM emissions were estimated using CalEEMod and modeled as area sources covering the Project disturbance limits. SJVAPCD considers PM_{10} exhaust to be a reasonable surrogate for DPM, and the maximum (worst-year) annual emissions were used in the HARP2 ADMRT risk calculations.

The highest modeled cancer risk occurs at Receptor 15, a residence located adjacent to the northern side of the central portion of Project 1. Results are presented in the table below.

Table 2 Construction HRA Results Compared to SJVAPCD Thresholds of Significance

RISK[1]	CARCINOGEN (risk in one million)	CHRONIC HAZARD INDEX	ACUTE HAZARD INDEX
Construction Health Risk	14.6	0.016	N/A[1]
Thresholds of Significance	20	1	1
Exceeds Threshold?	***NO***	***NO***	***NO***

[1]No Acute HI was calculated for Construction DPM acute because OEHHA has not established REL.

Construction health risks would be below SJVAPCD thresholds of significance. Therefore, the Project would not expose sensitive receptors to substantial pollutant concentrations, and TAC impacts would be ***less than significant***.

6.2 Ambient Air Quality (AAQA) Impacts

As described in the AAQA Methodology, the Project is exempt from SJVAPCD Rule 9510 (Indirect Source Review). Because the Project is exempt from ISR, the AAQA process concludes at this step and no further AAQA evaluation is required.

The subsequent AAQA steps—maximum daily onsite screening against the 100-pound-per-day threshold, onsite plus one-quarter-mile mobile-source adjustments, air dispersion modeling, and localized concentration analysis—are not required for this Project.

Because the Project is exempt from SJVAPCD Rule 9510, no further AAQA evaluation is required. The Project would not result in localized exceedances of the NAAQS or CAAQS, and AAQA impacts would be ***less than significant***.

6.3 Criteria Pollutant Emissions

This section provides a brief summary of construction and operational criteria pollutant emissions for informational purposes only. These emissions are limited to basic CalEEMod outputs.

Construction and operational criteria pollutant emissions were estimated using CalEEMod, as described in Section 5 Methodology. Construction emissions reflect standard equipment and schedules for active transportation projects. Operational emissions would consist of minor lighting electricity use and occasional maintenance trips, resulting in negligible operational emission levels. Combined construction and operational emissions are presented in the table below.

Table 3 Criteria Pollutant Emissions Compared to SJVAPCD Thresholds of Significance (tons per year)

CONSTRUCTION	CO	NOx	ROG	SOx	PM_{10}	$PM_{2.5}$
Construction Emissions (mitigated, worst year)	0.8	0.7	0.8	0.002	0.05	0.03
SJVAPCD Threshold of Significance	100	10	10	27	15	15
Exceeds Threshold?	**NO**	**NO**	**NO**	**NO**	**NO**	**NO**
OPERATION	**CO**	**NOx**	**ROG**	**SOx**	**PM_{10}**	**$PM_{2.5}$**
Operational Emissions	0.0	0.0	0.002	0.0	0.0	0.0
SJVAPCD Threshold of Significance	100	10	10	27	15	15
Exceeds Threshold?	**NO**	**NO**	**NO**	**NO**	**NO**	**NO**

CO = carbon monoxide
NOx = oxides of nitrogen
ROG = reactive organic gases
SO_x = oxides of sulfur; sulfur dioxide (SO_2) is the primary constituent and essentially equivalent
PM_{10} = particulate matter with an aerodynamic diameter less than 10 microns
$PM_{2.5}$ = particulate matter with an aerodynamic diameter less than 2.5 microns

Construction and operational criteria pollutant emissions are provided for informational purposes only and do not constitute a full Air Quality analysis. No CEQA significance determination is provided within this HRA for criteria pollutant emissions.

6.4 Greenhouse Gas Emissions

This section provides a brief summary of construction and operational greenhouse gas (GHG) emissions for informational purposes only. These emissions are limited to basic CalEEMod outputs.

Construction GHG emissions were estimated using CalEEMod, as described in Section 5 Methodology. Operational GHG emissions would consist of minor lighting electricity use and occasional maintenance trips, resulting in negligible operational GHG emission levels. Combined construction and operational GHG emissions are presented in Table 4.

Table 4 Project Greenhouse Gas Emissions (metric tons per year)

CONSTRUCTION	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Construction Emissions (worst year)	---	132	132	0.005	0.001	0.001	133
OPERATION[1]	**BCO2**	**NBCO2**	**CO2T**	**CH4**	**N2O**	**R**	**CO2e**
Operational Emissions	0.0	0.0	0.0	0.0	0.0	0.0	0.0

BCO2 = biogenic carbon dioxide
NBCO2 = non-biogenic (anthropogenic) carbon dioxide
CO2T = total carbon dioxide
CH4 = methane
N2O = nitrous oxide
R = refrigerants
CO2e = carbon dioxide equivalents (total)

[1]Operational emissions would be negligible for this type of facility and are conservatively represented as zero in CalEEMod.

GHG emissions are provided for informational purposes only. The Project would not generate substantial long-term GHG emissions. No CEQA significance determination is provided within this HRA for GHG emissions.

6.5 Mitigation and Project Commitments

Mitigation Measures

No mitigation measures are required.

Project Commitments (Not CEQA Mitigation)

- Compliance with all applicable SJVAPCD rules and regulations
- Compliance with all applicable construction best management practices
- Obtaining any required SJVAPCD permits prior to operation of equipment or activities subject to District permitting

7 References

Association of Environmental Professionals. (2025). *2025 California Environmental Quality Act (CEQA) Statute and Guidelines.*

California Air Pollution Control Officers Association. (2022). *California Emissions Estimator Model.* Retrieved from https://caleemod.com/.

California Air Pollution Control Officers Association. (2024). *Non-Vehicular Diesel Engine Risk Assessment Guidance.* Retrieved from https://ww2.arb.ca.gov/sites/default/files/classic/ab2588/2024%20DICE%20Screening%20Risk%20Guidelines.pdf.

California Air Resources Board. (2022a). *HARP Air Dispersion Modeling and Risk Tool.* Retrieved from https://ww2.arb.ca.gov/resources/documents/harp-air-dispersion-modeling-and-risk-tool.

California Air Resources Board. (2024). *Non-Vehicular Diesel Engine Risk Assessment Guidance.* Retrieved from https://ww2.arb.ca.gov/resources/documents/non-vehicular-diesel-engine-risk-assessment-guidance.

Office of Environmental Health Hazard Asssessment. (2015). *Risk Assessment Guidelines - Guidance Manual for Preparation of Health Risk Assessments.* Retrieved from https://oehha.ca.gov/media/downloads/crnr/2015guidancemanual.pdf.

San Joaquin Valley Air Pollution Control District . (2018). *APR 2030 - Project Ambient Air Quality Analysis Applicability Determination under CEQA.* Retrieved from https://ww2.valleyair.org/media/50ahzpwc/apr-2030.pdf.

San Joaquin Valley Air Pollution Control District. (2015). *Guidance for Assessing and Mitigating Air Quality Impacts.* Retrieved from https://ww2.valleyair.org/media/g4nl3p0g/gamaqi.pdf.

San Joaquin Valley Air Pollution Control District. (2015). *Guidance for Assessing and Mitigating Air Quality Impacts.* Retrieved from https://www.valleyair.org/transportation/GAMAQI.pdf.

San Joaquin Valley Air Pollution Control District. (2020). *Policy APR 1906 - Framework for Performing Health Risk Assessments.* Retrieved from https://ww2.valleyair.org/media/0shm0mlk/apr-1906.pdf.

San Joaquin Valley Air Pollution Control District. (2022a). *Guidance for Air Dispersion Modeling.* Retrieved from https://ww2.valleyair.org/media/zlbhrg22/modeling_guidance.pdf.

San Joaquin Valley Air Pollution Control District. (2024). *APR 1925 - Policy for District Rule 2201 AAQA Modeling.* Retrieved from https://ww2.valleyair.org/media/341fy4sn/apr-1925-rule-2201-aaqa-modeling-may-2024.pdf.

Appendix A. CalEEMod Results

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March 2026

Tule ATP Phase 1 HRA Detailed Report

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5.10.3. Landscape Equipment

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5.11.1. Unmitigated

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

5.13. Operational Waste Generation

5.13.1. Unmitigated

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

5.16.2. Process Boilers

5.17. User Defined

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

5.18.2. Sequestration

5.18.2.1. Unmitigated

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

6.2. Initial Climate Risk Scores

6.3. Adjusted Climate Risk Scores

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

7.2. Healthy Places Index Scores

7.3. Overall Health & Equity Scores

7.4. Health & Equity Measures

7.5. Evaluation Scorecard

7.6. Health & Equity Custom Measures

8. User Changes to Default Data

1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	Tule ATP Phase 1 HRA
Construction Start Date	6/1/2026
Operational Year	2026
Lead Agency	—
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	2.10000
Precipitation (days)	25.6000
Location	36.026552, -118.798181
County	Tulare
City	Unincorporated
Air District	San Joaquin Valley APCD
Air Basin	San Joaquin Valley
TAZ	2772
EDFZ	9
Electric Utility	Southern California Edison
Gas Utility	Southern California Gas
App Version	2022.1.1.41

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
Other Non-Asphalt Surfaces	72.4400	1000sqft	1.66299	0.00000	0.00000	0.00000	—	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

2. Emissions Summary

2.1. Construction Emissions Compared Against Thresholds

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

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	2.15229	2.12848	12.9746	15.1652	0.02393	0.57894	7.13699	7.71593	0.53263	3.43749	3.97011	—	2,567.77	2,567.77	0.10577	0.02346	0.26278	2,577.67
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.21973	1.01475	8.56875	9.95599	0.01942	0.29272	0.00000	0.29272	0.26930	0.00000	0.26930	—	1,800.96	1,800.96	0.07305	0.01461	0.00000	1,807.14
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.54160	0.45185	3.86431	4.47769	0.00835	0.13779	0.11641	0.25420	0.12677	0.05504	0.18181	—	799.696	799.696	0.03258	0.00667	0.00759	802.504
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.09884	0.08246	0.70524	0.81718	0.00152	0.02515	0.02124	0.04639	0.02314	0.01004	0.03318	—	132.399	132.399	0.00539	0.00110	0.00126	132.864

2.2. Construction Emissions by Year

2.2.1. Total Construction Emissions by Year, Unmitigated

Includes both onsite and offsite emissions.

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

Year	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e

Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	1.74838	1.47495	12.9746	15.1652	0.02393	0.57894	7.13699	7.71593	0.53263	3.43749	3.97011	—	2,567.77	2,567.77	0.10577	0.02346	0.26278	2,577.67
2027	2.15229	2.12848	8.25338	9.90715	0.01942	0.26132	0.06800	0.26132	0.24041	0.01594	0.24041	—	1,800.91	1,800.91	0.07305	0.01461	0.23820	1,807.09
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	1.21973	1.01475	8.56875	9.95599	0.01942	0.29272	0.00000	0.29272	0.26930	0.00000	0.26930	—	1,800.96	1,800.96	0.07305	0.01461	0.00000	1,807.14
2027	1.16707	0.97105	8.25338	9.90715	0.01942	0.26132	0.00000	0.26132	0.24041	0.00000	0.24041	—	1,800.91	1,800.91	0.07305	0.01461	0.00000	1,807.09
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	0.54160	0.45185	3.86431	4.47769	0.00835	0.13779	0.11641	0.25420	0.12677	0.05504	0.18181	—	799.696	799.696	0.03258	0.00667	0.00759	802.504
2027	0.31515	0.27173	1.83741	2.25555	0.00430	0.05884	0.00183	0.06067	0.05413	0.00043	0.05456	—	402.693	402.693	0.01639	0.00334	0.00282	404.101
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	0.09884	0.08246	0.70524	0.81718	0.00152	0.02515	0.02124	0.04639	0.02314	0.01004	0.03318	—	132.399	132.399	0.00539	0.00110	0.00126	132.864
2027	0.05752	0.04959	0.33533	0.41164	0.00078	0.01074	0.00033	0.01107	0.00988	0.00008	0.00996	—	66.6704	66.6704	0.00271	0.00055	0.00047	66.9035

2.2.2. Onsite Construction Emissions by Year, Unmitigated

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

Year	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	1.69573	1.42488	12.9413	14.6164	0.02393	0.57894	7.08259	7.66153	0.53263	3.42474	3.95736	—	2,493.95	2,493.95	0.10117	0.02023	0.00000	2,502.51
2027	2.15229	2.12848	8.25338	9.90715	0.01942	0.26132	0.00000	0.26132	0.24041	0.00000	0.24041	—	1,800.91	1,800.91	0.07305	0.01461	0.00000	1,807.09
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	1.21973	1.01475	8.56875	9.95599	0.01942	0.29272	0.00000	0.29272	0.26930	0.00000	0.26930	—	1,800.96	1,800.96	0.07305	0.01461	0.00000	1,807.14
2027	1.16707	0.97105	8.25338	9.90715	0.01942	0.26132	0.00000	0.26132	0.24041	0.00000	0.24041	—	1,800.91	1,800.91	0.07305	0.01461	0.00000	1,807.09

Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	0.53767	0.44813	3.86177	4.44798	0.00835	0.13779	0.11194	0.24973	0.12677	0.05399	0.18076	—	795.165	795.165	0.03226	0.00645	0.00000	797.894
2027	0.31368	0.27035	1.83644	2.24435	0.00430	0.05884	0.00000	0.05884	0.05413	0.00000	0.05413	—	400.874	400.874	0.01626	0.00325	0.00000	402.249
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	0.09812	0.08178	0.70477	0.81176	0.00152	0.02515	0.02043	0.04558	0.02314	0.00985	0.03299	—	131.649	131.649	0.00534	0.00107	0.00000	132.101
2027	0.05725	0.04934	0.33515	0.40959	0.00078	0.01074	0.00000	0.01074	0.00988	0.00000	0.00988	—	66.3692	66.3692	0.00269	0.00054	0.00000	66.5970

2.2.3. Offsite Construction Emissions by Year, Unmitigated

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

Year	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	0.06581	0.06258	0.03326	0.54881	0.00000	0.00000	0.06800	0.06800	0.00000	0.01594	0.01594	—	73.8264	73.8264	0.00460	0.00322	0.26278	75.1651
2027	0.06167	0.05660	0.03059	0.50475	0.00000	0.00000	0.06800	0.06800	0.00000	0.01594	0.01594	—	72.3157	72.3157	0.00433	0.00322	0.23820	73.6229
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
2027	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	0.00394	0.00372	0.00254	0.02971	0.00000	0.00000	0.00447	0.00447	0.00000	0.00105	0.00105	—	4.53010	4.53010	0.00033	0.00022	0.00759	4.61007
2027	0.00147	0.00138	0.00097	0.01121	0.00000	0.00000	0.00183	0.00183	0.00000	0.00043	0.00043	—	1.81907	1.81907	0.00013	0.00009	0.00282	1.85136
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	0.00072	0.00068	0.00046	0.00542	0.00000	0.00000	0.00082	0.00082	0.00000	0.00019	0.00019	—	0.75001	0.75001	0.00005	0.00004	0.00126	0.76325
2027	0.00027	0.00025	0.00018	0.00204	0.00000	0.00000	0.00033	0.00033	0.00000	0.00008	0.00008	—	0.30117	0.30117	0.00002	0.00001	0.00047	0.30651

2.3. Operations Emissions Compared Against Thresholds

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

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.01122	0.01122	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.01122	0.01122	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.01122	0.01122	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.00205	0.00205	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

2.4. Operations Emissions by Sector, Unmitigated

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

Sector	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Area	0.01122	0.01122	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	—	0.00000	—	0.00000	0.00000	0.00000	0.00000	—	0.00000
Energy	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	—	0.00000	—	0.00000	0.00000	0.00000	0.00000	—	0.00000
Water	—	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000
Waste	—	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000
Total	0.01122	0.01122	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Area	0.01122	0.01122	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Energy	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	—	0.00000	—	0.00000	0.00000	0.00000	0.00000	—	0.00000
Water	—	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000
Waste	—	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000
Total	0.01122	0.01122	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Area	0.01122	0.01122	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	—	0.00000	—	0.00000	0.00000	0.00000	0.00000	—	0.00000
Energy	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	—	0.00000	—	0.00000	0.00000	0.00000	0.00000	—	0.00000
Water	—	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000
Waste	—	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000
Total	0.01122	0.01122	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Area	0.00205	0.00205	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	—	0.00000	—	0.00000	0.00000	0.00000	0.00000	—	0.00000
Energy	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	—	0.00000	—	0.00000	0.00000	0.00000	0.00000	—	0.00000
Water	—	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000
Waste	—	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000
Total	0.00205	0.00205	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

3. Construction Emissions Details

3.1. Demolition (2026)

3.1.1. Onsite - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.65937	1.39140	12.9413	14.6164	0.02393	0.50831	—	0.50831	0.46764	—	0.46764	—	2,493.95	2,493.95	0.10117	0.02023	—	2,502.51
Demolition	—	—	—	—	—	—	0.00000	0.00000	—	0.00000	0.00000	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.09092	0.07624	0.70911	0.80090	0.00131	0.02785	—	0.02785	0.02562	—	0.02562	—	136.655	136.655	0.00554	0.00111	—	137.124
Demolition	—	—	—	—	—	—	0.00000	0.00000	—	0.00000	0.00000	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01659	0.01391	0.12941	0.14616	0.00024	0.00508	—	0.00508	0.00468	—	0.00468	—	22.6247	22.6247	0.00092	0.00018	—	22.7024
Demolition	—	—	—	—	—	—	0.00000	0.00000	—	0.00000	0.00000	—	—	—	—	—	—	—

Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

3.1.2. Offsite - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06581	0.06258	0.03326	0.54881	0.00000	0.00000	0.06800	0.06800	0.00000	0.01594	0.01594	—	73.8264	73.8264	0.00460	0.00322	0.26278	75.1651
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00323	0.00305	0.00209	0.02435	0.00000	0.00000	0.00366	0.00366	0.00000	0.00086	0.00086	—	3.71320	3.71320	0.00027	0.00018	0.00622	3.77875
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00059	0.00056	0.00038	0.00444	0.00000	0.00000	0.00067	0.00067	0.00000	0.00016	0.00016	—	0.61476	0.61476	0.00004	0.00003	0.00103	0.62562
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

3.2. Site Preparation (2026)

3.2.1. Onsite - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.46980	1.23504	11.0389	11.7202	0.01906	0.50687	—	0.50687	0.46633	—	0.46633	—	2,064.92	2,064.92	0.08376	0.01675	—	2,072.01
Dust From Material Movement	—	—	—	—	—	—	6.26354	6.26354	—	3.00380	3.00380	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.00805	0.00677	0.06049	0.06422	0.00010	0.00278	—	0.00278	0.00256	—	0.00256	—	11.3146	11.3146	0.00046	0.00009	—	11.3535
Dust From Material Movement	—	—	—	—	—	—	0.03432	0.03432	—	0.01646	0.01646	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.00147	0.00124	0.01104	0.01172	0.00002	0.00051	—	0.00051	0.00047	—	0.00047	—	1.87327	1.87327	0.00008	0.00002	—	1.87970
Dust From Material Movement	—	—	—	—	—	—	0.00626	0.00626	—	0.00300	0.00300	—	—	—	—	—	—	—

Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

3.2.2. Offsite - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.03948	0.03755	0.01996	0.32929	0.00000	0.00000	0.04080	0.04080	0.00000	0.00956	0.00956	—	44.2958	44.2958	0.00276	0.00193	0.15767	45.0990
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00019	0.00018	0.00013	0.00146	0.00000	0.00000	0.00022	0.00022	0.00000	0.00005	0.00005	—	0.22279	0.22279	0.00002	0.00001	0.00037	0.22672
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00004	0.00003	0.00002	0.00027	0.00000	0.00000	0.00004	0.00004	0.00000	0.00001	0.00001	—	0.03689	0.03689	< 0.000005	< 0.000005	0.00006	0.03754
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

3.3. Grading (2026)

3.3.1. Onsite - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.69573	1.42488	12.8567	14.0337	0.02266	0.57894	—	0.57894	0.53263	—	0.53263	—	2,455.05	2,455.05	0.09959	0.01992	—	2,463.47
Dust From Material Movement	—	—	—	—	—	—	7.08259	7.08259	—	3.42474	3.42474	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01858	0.01562	0.14090	0.15379	0.00025	0.00634	—	0.00634	0.00584	—	0.00584	—	26.9046	26.9046	0.00109	0.00022	—	26.9970
Dust From Material Movement	—	—	—	—	—	—	0.07762	0.07762	—	0.03753	0.03753	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.00339	0.00285	0.02571	0.02807	0.00005	0.00116	—	0.00116	0.00107	—	0.00107	—	4.45437	4.45437	0.00018	0.00004	—	4.46966
Dust From Material Movement	—	—	—	—	—	—	0.01417	0.01417	—	0.00685	0.00685	—	—	—	—	—	—	—

Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

3.3.2. Offsite - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.05265	0.05007	0.02661	0.43905	0.00000	0.00000	0.05440	0.05440	0.00000	0.01275	0.01275	—	59.0611	59.0611	0.00368	0.00258	0.21022	60.1320
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00052	0.00049	0.00033	0.00390	0.00000	0.00000	0.00059	0.00059	0.00000	0.00014	0.00014	—	0.59411	0.59411	0.00004	0.00003	0.00099	0.60460
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00009	0.00009	0.00006	0.00071	0.00000	0.00000	0.00011	0.00011	0.00000	0.00003	0.00003	—	0.09836	0.09836	0.00001	< 0.000005	0.00016	0.10010
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

3.4. Building Construction (2026)

3.4.1. Onsite - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.21973	1.01475	8.56875	9.95599	0.01942	0.29272	—	0.29272	0.26930	—	0.26930	—	1,800.96	1,800.96	0.07305	0.01461	—	1,807.14
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.21973	1.01475	8.56875	9.95599	0.01942	0.29272	—	0.29272	0.26930	—	0.26930	—	1,800.96	1,800.96	0.07305	0.01461	—	1,807.14
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.42010	0.34950	2.95127	3.42907	0.00669	0.10082	—	0.10082	0.09275	—	0.09275	—	620.291	620.291	0.02516	0.00503	—	622.420
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.07667	0.06378	0.53861	0.62581	0.00122	0.01840	—	0.01840	0.01693	—	0.01693	—	102.696	102.696	0.00417	0.00083	—	103.049
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

3.4.2. Offsite - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

3.5. Building Construction (2027)

3.5.1. Onsite - Unmitigated

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

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

Off-Roa Equipment	1.16707	0.97105	8.25338	9.90715	0.01942	0.26132	—	0.26132	0.24041	—	0.24041	—	1,800.91	1,800.91	0.07305	0.01461	—	1,807.09
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Roa d Equipm ent	1.16707	0.97105	8.25338	9.90715	0.01942	0.26132	—	0.26132	0.24041	—	0.24041	—	1,800.91	1,800.91	0.07305	0.01461	—	1,807.09
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Roa d Equipm ent	0.23981	0.19953	1.69590	2.03572	0.00399	0.05370	—	0.05370	0.04940	—	0.04940	—	370.050	370.050	0.01501	0.00300	—	371.320
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Roa d Equipm ent	0.04377	0.03641	0.30950	0.37152	0.00073	0.00980	—	0.00980	0.00902	—	0.00902	—	61.2661	61.2661	0.00249	0.00050	—	61.4763
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

3.5.2. Offsite - Unmitigated

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

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

Worker	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

3.6. Paving (2027)

3.6.1. Onsite - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.54404	0.45646	4.29849	6.48965	0.00940	0.16865	—	0.16865	0.15516	—	0.15516	—	991.534	991.534	0.04022	0.00804	—	994.937

Paving	0.00000	0.00000	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01491	0.01251	0.11777	0.17780	0.00026	0.00462	—	0.00462	0.00425	—	0.00425	—	27.1653	27.1653	0.00110	0.00022	—	27.2585
Paving	0.00000	0.00000	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.00272	0.00228	0.02149	0.03245	0.00005	0.00084	—	0.00084	0.00078	—	0.00078	—	4.49753	4.49753	0.00018	0.00004	—	4.51296
Paving	0.00000	0.00000	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

3.6.2. Offsite - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06167	0.05660	0.03059	0.50475	0.00000	0.00000	0.06800	0.06800	0.00000	0.01594	0.01594	—	72.3157	72.3157	0.00433	0.00322	0.23820	73.6229
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00147	0.00138	0.00097	0.01121	0.00000	0.00000	0.00183	0.00183	0.00000	0.00043	0.00043	—	1.81907	1.81907	0.00013	0.00009	0.00282	1.85136
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00027	0.00025	0.00018	0.00204	0.00000	0.00000	0.00033	0.00033	0.00000	0.00008	0.00008	—	0.30117	0.30117	0.00002	0.00001	0.00047	0.30651
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

3.7. Architectural Coating (2027)

3.7.1. Onsite - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.13715	0.11335	0.83116	1.12539	0.00173	0.01905	—	0.01905	0.01752	—	0.01752	—	133.513	133.513	0.00542	0.00108	—	133.971
Architectural Coatings	2.01514	2.01514	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.00376	0.00311	0.02277	0.03083	0.00005	0.00052	—	0.00052	0.00048	—	0.00048	—	3.65788	3.65788	0.00015	0.00003	—	3.67044
Architectural Coatings	0.05521	0.05521	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.00069	0.00057	0.00416	0.00563	0.00001	0.00010	—	0.00010	0.00009	—	0.00009	—	0.60560	0.60560	0.00002	< 0.000005	—	0.60768
Architectural Coatings	0.01008	0.01008	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

3.7.2. Offsite - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Other Non-Asphalt Surfaces	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Total	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Other Non-Asphalt Surfaces	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Total	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Other Non-Asphalt Surfaces	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Total	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	0.00000	—	0.00000
Total	—	—	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	0.00000	—	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	0.00000	—	0.00000
Total	—	—	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	0.00000	—	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	0.00000	—	0.00000

Total	—	—	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	0.00000	—	0.00000

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Other Non-Asphalt Surfaces	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	—	0.00000	—	0.00000	0.00000	0.00000	0.00000	—	0.00000
Total	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	—	0.00000	—	0.00000	0.00000	0.00000	0.00000	—	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Other Non-Asphalt Surfaces	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	—	0.00000	—	0.00000	0.00000	0.00000	0.00000	—	0.00000
Total	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	—	0.00000	—	0.00000	0.00000	0.00000	0.00000	—	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Other Non-Asphalt Surfaces	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	—	0.00000	—	0.00000	0.00000	0.00000	0.00000	—	0.00000
Total	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	—	0.00000	—	0.00000	0.00000	0.00000	0.00000	—	0.00000

4.3. Area Emissions by Source

4.3.1. Unmitigated

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

Source	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.00570	0.00570	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.00552	0.00552	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	—	0.00000	—	0.00000	0.00000	0.00000	0.00000	—	0.00000
Total	0.01122	0.01122	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	—	0.00000	—	0.00000	0.00000	0.00000	0.00000	—	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.00570	0.00570	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.00552	0.00552	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	0.01122	0.01122	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.00104	0.00104	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.00101	0.00101	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Landscape	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	—	0.00000	—	0.00000	0.00000	0.00000	0.00000	—	0.00000
Total	0.00205	0.00205	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	—	0.00000	—	0.00000	0.00000	0.00000	0.00000	—	0.00000

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000
Total	—	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000
Total	—	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000
Total	—	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000
Total	—	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000
Total	—	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000
Total	—	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

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

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

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

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

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

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

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

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

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

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

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

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

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

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

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

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

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

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

Species	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

5. Activity Data

5.1. Construction Schedule

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase	Phase Description
Demolition	Demolition	6/1/2026	6/29/2026	5.00000	20.0000	—
Site Preparation	Site Preparation	6/30/2026	7/2/2026	5.00000	2.00000	—
Grading	Grading	7/3/2026	7/8/2026	5.00000	4.00000	—
Building Construction	Building Construction	7/9/2026	4/15/2027	5.00000	200.000	—
Paving	Paving	4/16/2027	4/30/2027	5.00000	10.00000	—
Architectural Coating	Architectural Coating	5/1/2027	5/15/2027	5.00000	10.00000	—

5.2. Off-Road Equipment

5.2.1. Unmitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Demolition	Concrete/Industrial Saws	Diesel	Average	1.000000	8.00000	33.0000	0.73000
Demolition	Rubber Tired Dozers	Diesel	Average	1.000000	8.00000	367.000	0.40000
Demolition	Tractors/Loaders/Backhoes	Diesel	Average	3.00000	8.00000	84.0000	0.37000
Site Preparation	Graders	Diesel	Average	1.000000	8.00000	148.000	0.41000
Site Preparation	Rubber Tired Dozers	Diesel	Average	1.000000	7.00000	367.000	0.40000
Site Preparation	Tractors/Loaders/Backhoes	Diesel	Average	1.000000	8.00000	84.0000	0.37000
Grading	Graders	Diesel	Average	1.000000	8.00000	148.000	0.41000
Grading	Rubber Tired Dozers	Diesel	Average	1.000000	8.00000	367.000	0.40000

Grading	Tractors/Loaders/Back	Diesel	Average	2.00000	7.00000	84.0000	0.37000
Building Construction	Cranes	Diesel	Average	1.000000	6.00000	367.000	0.29000
Building Construction	Forklifts	Diesel	Average	1.000000	6.00000	82.0000	0.20000
Building Construction	Generator Sets	Diesel	Average	1.000000	8.00000	14.0000	0.74000
Building Construction	Tractors/Loaders/Back hoes	Diesel	Average	1.000000	6.00000	84.0000	0.37000
Building Construction	Welders	Diesel	Average	3.00000	8.00000	46.0000	0.45000
Paving	Cement and Mortar Mixers	Diesel	Average	1.000000	6.00000	10.00000	0.56000
Paving	Pavers	Diesel	Average	1.000000	6.00000	81.0000	0.42000
Paving	Paving Equipment	Diesel	Average	1.000000	8.00000	89.0000	0.36000
Paving	Rollers	Diesel	Average	1.000000	7.00000	36.0000	0.38000
Paving	Tractors/Loaders/Back hoes	Diesel	Average	1.000000	8.00000	84.0000	0.37000
Architectural Coating	Air Compressors	Diesel	Average	1.000000	6.00000	37.0000	0.48000

5.3. Construction Vehicles

5.3.1. Unmitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Demolition	Worker	12.5000	7.70000	LDA,LDT1,LDT2
Demolition	Vendor	—	6.80000	HHDT,MHDT
Demolition	Hauling	0.00000	20.0000	HHDT
Demolition	Onsite truck	—	—	HHDT
Site Preparation	Worker	7.50000	7.70000	LDA,LDT1,LDT2
Site Preparation	Vendor	—	6.80000	HHDT,MHDT
Site Preparation	Hauling	0.00000	20.0000	HHDT
Site Preparation	Onsite truck	—	—	HHDT
Grading	Worker	10.00000	7.70000	LDA,LDT1,LDT2

Grading	Vendor	—	6.80000	HHDT,MHDT
Grading	Hauling	0.00000	20.0000	HHDT
Grading	Onsite truck	—	—	HHDT
Building Construction	Worker	0.00000	7.70000	LDA,LDT1,LDT2
Building Construction	Vendor	0.00000	6.80000	HHDT,MHDT
Building Construction	Hauling	0.00000	20.0000	HHDT
Building Construction	Onsite truck	—	—	HHDT
Paving	Worker	12.5000	7.70000	LDA,LDT1,LDT2
Paving	Vendor	—	6.80000	HHDT,MHDT
Paving	Hauling	0.00000	20.0000	HHDT
Paving	Onsite truck	—	—	HHDT
Architectural Coating	Worker	0.00000	7.70000	LDA,LDT1,LDT2
Architectural Coating	Vendor	—	6.80000	HHDT,MHDT
Architectural Coating	Hauling	0.00000	20.0000	HHDT
Architectural Coating	Onsite truck	—	—	HHDT

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

Non-applicable. No control strategies activated by user.

5.5. Architectural Coatings

Phase Name	Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
Architectural Coating	0.00000	0.00000	0.00000	0.00000	4,346.40

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (cy)	Material Exported (cy)	Acres Graded (acres)	Material Demolished (sq. ft.)	Acres Paved (acres)
Demolition	0.00000	0.00000	0.00000	—	0.00000
Site Preparation	—	—	1.87500	0.00000	0.00000
Grading	—	—	4.00000	0.00000	0.00000
Paving	0.00000	0.00000	0.00000	0.00000	1.66299

5.6.2. Construction Earthmoving Control Strategies

Non-applicable. No control strategies activated by user.

5.7. Construction Paving

Phase Name	Land Use	Area Paved (acres)	% Asphalt
Paving	Other Non-Asphalt Surfaces	1.66299	0%

5.8. Construction Electricity Consumption and Emissions Factors

kWh per Year and Emission Factor (lb/MWh)

Year	kWh per Year	CO2	CH4	N2O
2026	0.00000	531.983	0.03300	0.00400
2027	0.00000	531.983	0.03300	0.00400

5.9. Operational Mobile Sources

5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
Other Non-Asphalt Surfaces	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

5.10. Operational Area Sources

5.10.1. Hearths

Land Use	Hearth Type	Unmitigated (number)	Mitigated (number)
Other Non-Asphalt Surfaces	Wood Fireplaces	0	0
Other Non-Asphalt Surfaces	Gas Fireplaces	0	0
Other Non-Asphalt Surfaces	Propane Fireplaces	0	0
Other Non-Asphalt Surfaces	Electric Fireplaces	0	0
Other Non-Asphalt Surfaces	No Fireplaces	0	0
Other Non-Asphalt Surfaces	Conventional Wood Stoves	0	0
Other Non-Asphalt Surfaces	Catalytic Wood Stoves	0	0
Other Non-Asphalt Surfaces	Non-Catalytic Wood Stoves	0	0
Other Non-Asphalt Surfaces	Pellet Wood Stoves	0	0

5.10.2. Architectural Coatings

Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
0.00000	0.00000	0.00000	0.00000	4,346.40

5.10.3. Landscape Equipment

Season	Unit	Value
Snow Days	day/yr	0.00000
Summer Days	day/yr	180.000

5.11. Operational Energy Consumption

5.11.1. Unmitigated

Electricity (kWh/yr) and CO2 and CH4 and N2O and Natural Gas (kBTU/yr)

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)

Other Non-Asphalt Surfaces	0.00000	346.196	0.0330	0.0040	0.00000

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Other Non-Asphalt Surfaces	0.00000	0.00000

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Other Non-Asphalt Surfaces	0.00000	0.00000

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

5.16.2. Process Boilers

5.17. User Defined

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres

5.18.2. Sequestration

5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

Cal-Adapt midcentury 2040–2059 average projections for four hazards are reported below for your project location. These are under Representation Concentration Pathway (RCP) 8.5 which assumes GHG emissions will continue to rise strongly through 2050 and then plateau around 2100.

Climate Hazard	Result for Project Location	Unit
Temperature and Extreme Heat	35.1300	annual days of extreme heat
Extreme Precipitation	9.30000	annual days with precipitation above 20 mm
Sea Level Rise	—	meters of inundation depth
Wildfire	30.2800	annual hectares burned

Temperature and Extreme Heat data are for grid cell in which your project are located. The projection is based on the 98th historical percentile of daily maximum/minimum temperatures from observed historical data (32 climate model ensemble from Cal-Adapt, 2040–2059 average under RCP 8.5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Extreme Precipitation data are for the grid cell in which your project are located. The threshold of 20 mm is equivalent to about ¾ an inch of rain, which would be light to moderate rainfall if received over a full day or heavy rain if received over a period of 2 to 4 hours. Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Sea Level Rise data are for the grid cell in which your project are located. The projections are from Radke et al. (2017), as reported in Cal-Adapt (Radke et al., 2017, CEC-500-2017-008), and consider inundation location and depth for the San Francisco Bay, the Sacramento-San Joaquin River Delta and California coast resulting different increments of sea level rise coupled with extreme storm events. Users may select from four scenarios to view the range in potential inundation depth for the grid cell. The four scenarios are: No rise, 0.5 meter, 1.0 meter, 1.41 meters
Wildfire data are for the grid cell in which your project are located. The projections are from UC Davis, as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider historical data of climate, vegetation, population density, and large (> 400 ha) fire history. Users may select from four model simulations to view the range in potential wildfire probabilities for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

6.2. Initial Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	5	0	0	N/A
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	N/A	N/A	N/A	N/A
Wildfire	N/A	N/A	N/A	N/A
Flooding	0	0	0	N/A
Drought	0	0	0	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	0	0	0	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores do not include implementation of climate risk reduction measures.

6.3. Adjusted Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	5	1	1	4
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	N/A	N/A	N/A	N/A

Wildfire	N/A	N/A	N/A	N/A
Flooding	1	1	1	2
Drought	1	1	1	2
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	1	1	1	2

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores include implementation of climate risk reduction measures.

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Exposure Indicators	—
AQ-Ozone	84.6546
AQ-PM	4.34350
AQ-DPM	0.67206
Drinking Water	99.8501
Lead Risk Housing	34.1399
Pesticides	46.6552
Toxic Releases	8.00200
Traffic	0.23750
Effect Indicators	—
CleanUp Sites	0.00000
Groundwater	50.2739

Haz Waste Facilities/Generators	16.6380
Impaired Water Bodies	43.7841
Solid Waste	96.9072
Sensitive Population	—
Asthma	25.3490
Cardio-vascular	53.0284
Low Birth Weights	74.2238
Socioeconomic Factor Indicators	—
Education	38.1296
Housing	53.1179
Linguistic	6.26607
Poverty	71.2186
Unemployment	84.9818

7.2. Healthy Places Index Scores

The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Economic	—
Above Poverty	52.81663031
Employed	24.97112794
Median HI	40.99833184
Education	—
Bachelor's or higher	32.95264981
High school enrollment	100
Preschool enrollment	76.50455537
Transportation	—
Auto Access	82.44578468
Active commuting	14.75683306

Social	—
2-parent households	9.611189529
Voting	91.6976774
Neighborhood	—
Alcohol availability	90.94058771
Park access	10.83023226
Retail density	0.20531246
Supermarket access	21.76312075
Tree canopy	93.16052868
Housing	—
Homeownership	78.53201591
Housing habitability	88.37418196
Low-inc homeowner severe housing cost burden	55.70383678
Low-inc renter severe housing cost burden	88.41267804
Uncrowded housing	78.31387142
Health Outcomes	—
Insured adults	56.82022328
Arthritis	0.0
Asthma ER Admissions	76.5
High Blood Pressure	0.0
Cancer (excluding skin)	0.0
Asthma	0.0
Coronary Heart Disease	0.0
Chronic Obstructive Pulmonary Disease	0.0
Diagnosed Diabetes	0.0
Life Expectancy at Birth	30.0
Cognitively Disabled	36.6
Physically Disabled	7.8

Heart Attack ER Admissions	54.8
Mental Health Not Good	0.0
Chronic Kidney Disease	0.0
Obesity	0.0
Pedestrian Injuries	46.1
Physical Health Not Good	0.0
Stroke	0.0
Health Risk Behaviors	—
Binge Drinking	0.0
Current Smoker	0.0
No Leisure Time for Physical Activity	0.0
Climate Change Exposures	—
Wildfire Risk	6.5
SLR Inundation Area	0.0
Children	78.7
Elderly	6.3
English Speaking	94.3
Foreign-born	1.8
Outdoor Workers	29.5
Climate Change Adaptive Capacity	—
Impervious Surface Cover	98.1
Traffic Density	0.3
Traffic Access	0.0
Other Indices	—
Hardship	48.5
Other Decision Support	—
2016 Voting	79.6

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	46.0000
Healthy Places Index Score for Project Location (b)	48.0000
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	No
Project Located in a Low-Income Community (Assembly Bill 1550)	No
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	No

a: The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.
b: The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

7.4. Health & Equity Measures

No Health & Equity Measures selected.

7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

7.6. Health & Equity Custom Measures

No Health & Equity Custom Measures created.

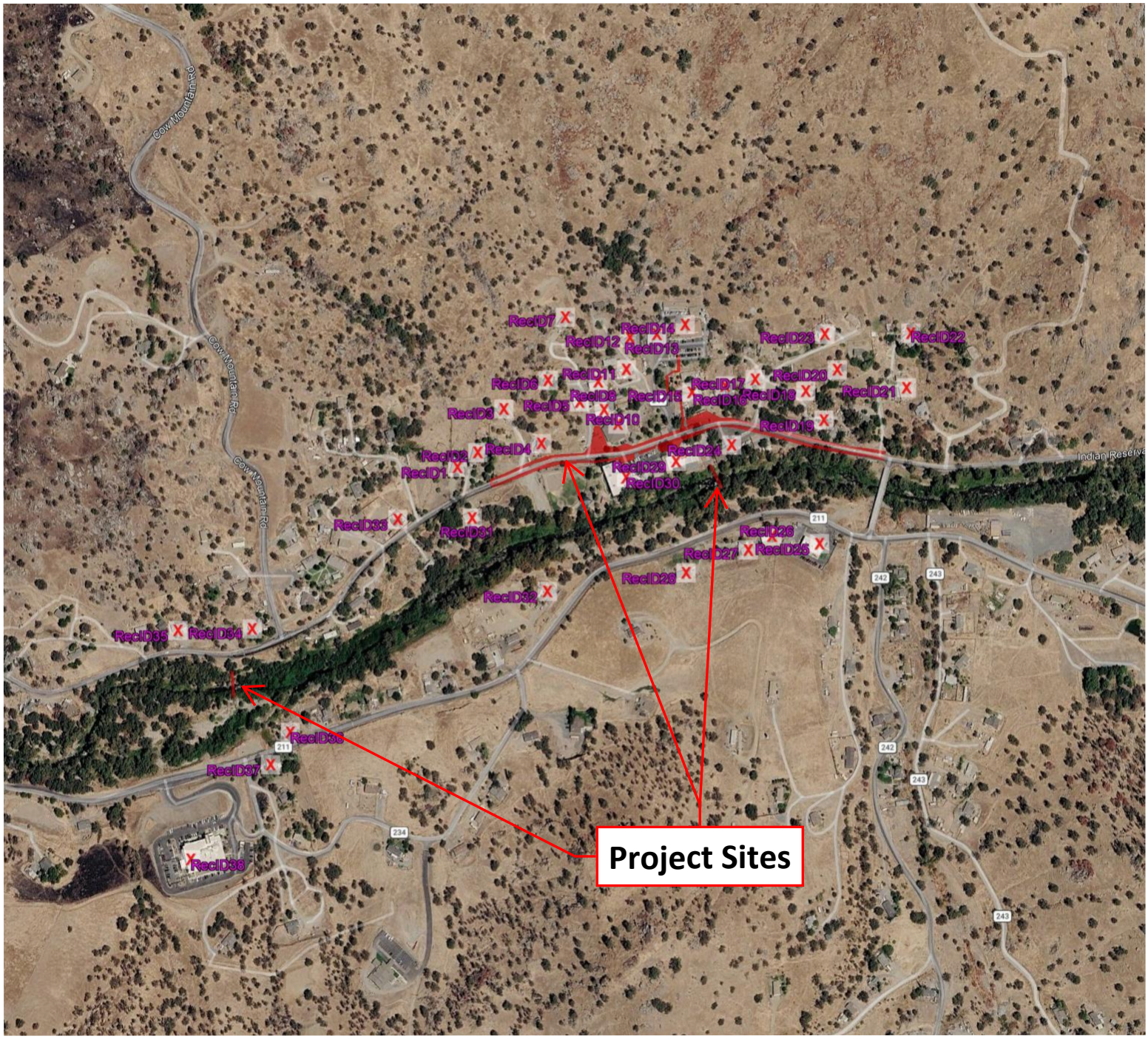
8. User Changes to Default Data

Appendix B. AERMOD and HARP2 ADMRT Results

Prepared by Core Environmental Consulting:

Jesse Madsen, Owner, Principal Scientist
Clovis, CA

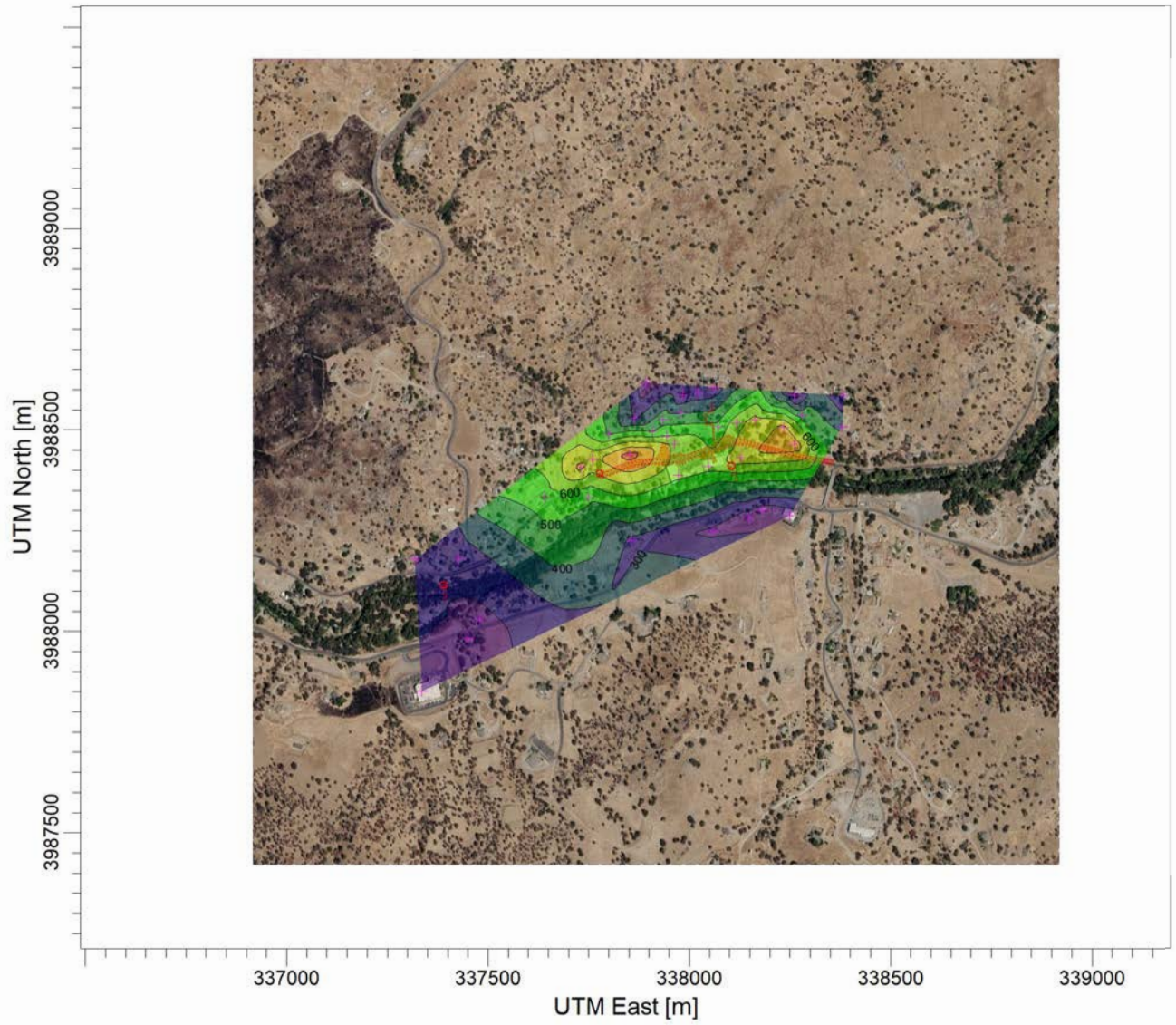
March 2026



CORE ENVIRONMENTAL CONSULTING Core Environmental Consulting Clovis, CA 93612 (559) 202-3941	PROJECT NAME **Tule ATP Phase 1 HRA**	DATE **3/13/26**	SCALE **NOT TO SCALE**	**APPENDIX B** **RECEPTOR MAP**
	PROJECT NUMBER **24017**	DRAWN BY **JM**	LAT/LONG **36.026552, -118.798181**	

PROJECT TITLE:

C:\Lakes\AERMOD View\24017 - Tule ATP HRA\24017 - Tule ATP HRA.isc



PLOT FILE OF HIGH 1ST HIGH 1-HR VALUES FOR SOURCE GROUP: PAREA1

ug/m^3

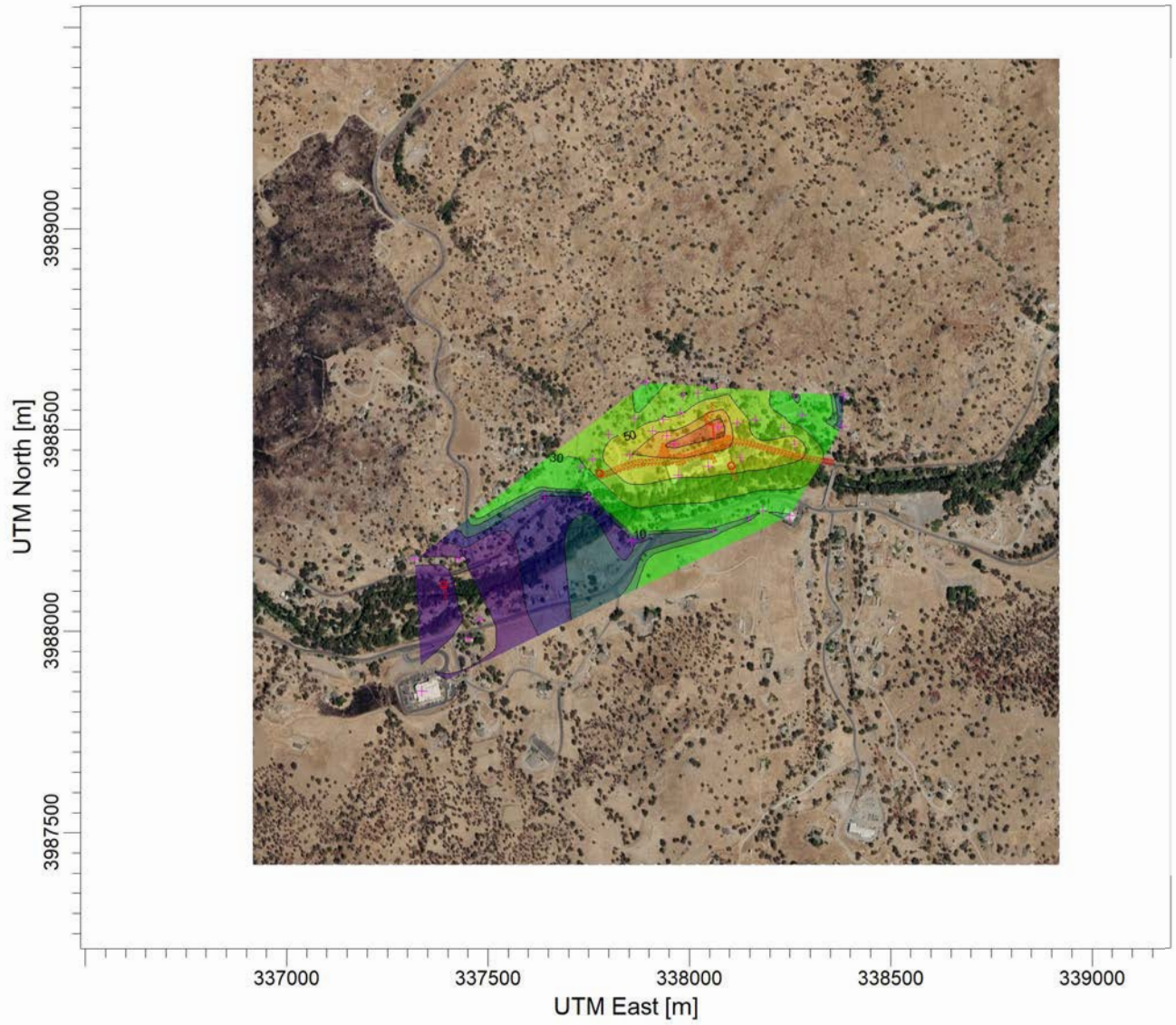
Max: 946 [ug/m^3] at (337851.90, 3988438.85)



COMMENTS:	SOURCES: **3**	COMPANY NAME:	
	RECEPTORS: **38**	MODELER:	
	OUTPUT TYPE: **Concentration**	SCALE: 1:17,025 0 0.5 km	
	MAX: **946 ug/m^3**	DATE: **3/13/2026**	PROJECT NO.:

PROJECT TITLE:

C:\Lakes\AERMOD View\24017 - Tule ATP HRA\24017 - Tule ATP HRA.isc



PLOT FILE OF ANNUAL VALUES AVERAGED ACROSS 4 YEARS FOR SOURCE GROUP: PAREA1 ug/m^3

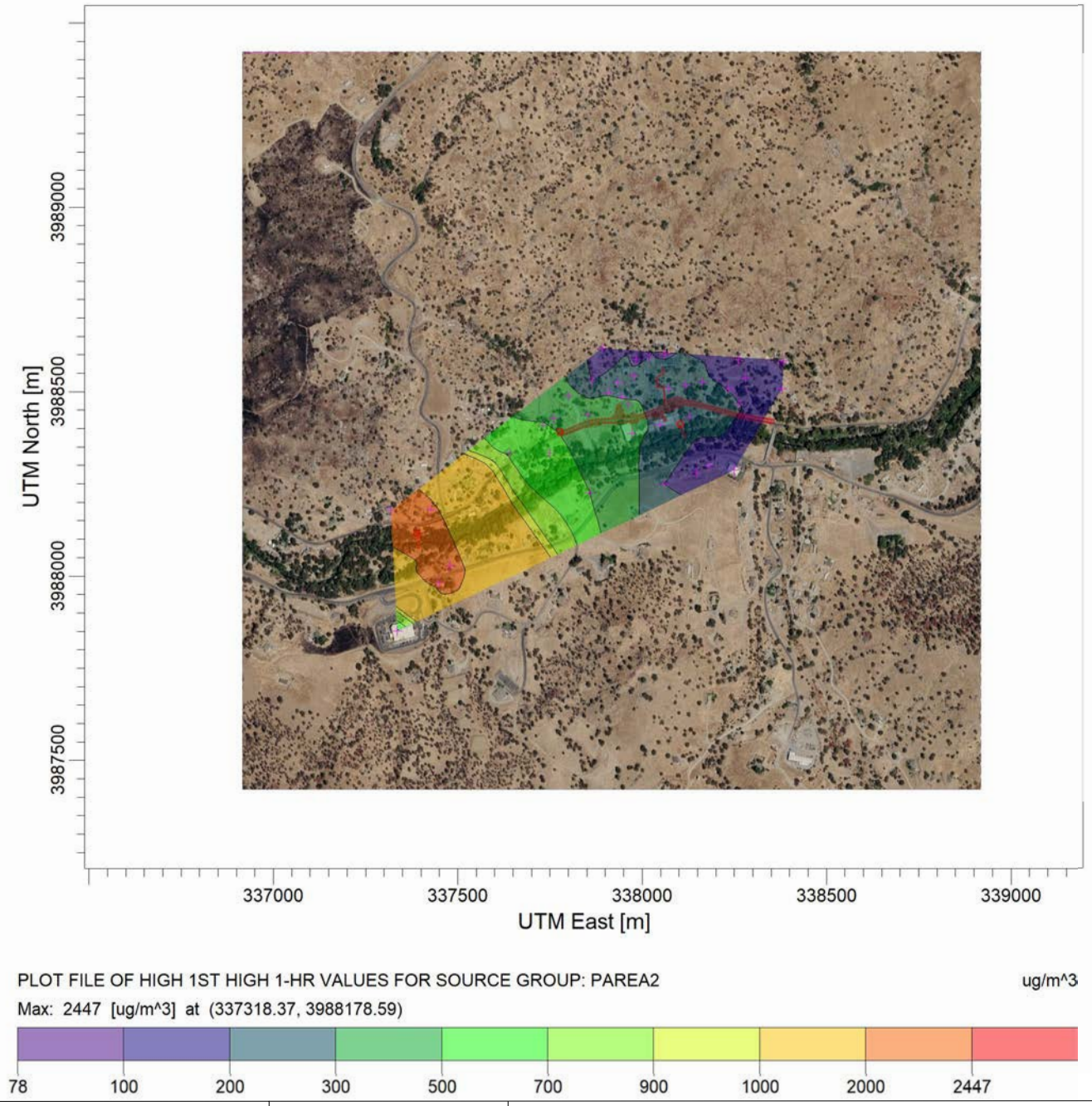
Max: 117 [ug/m^3] at (338070.85, 3988508.37)



COMMENTS:	SOURCES: **3**	COMPANY NAME:	
	RECEPTORS: **38**	MODELER:	
	OUTPUT TYPE: **Concentration**	SCALE: 1:17,025 0 0.5 km	
	MAX: **117 ug/m^3**	DATE: **3/13/2026**	PROJECT NO.:

PROJECT TITLE:

C:\Lakes\AERMOD View\24017 - Tule ATP HRA\24017 - Tule ATP HRA.isc



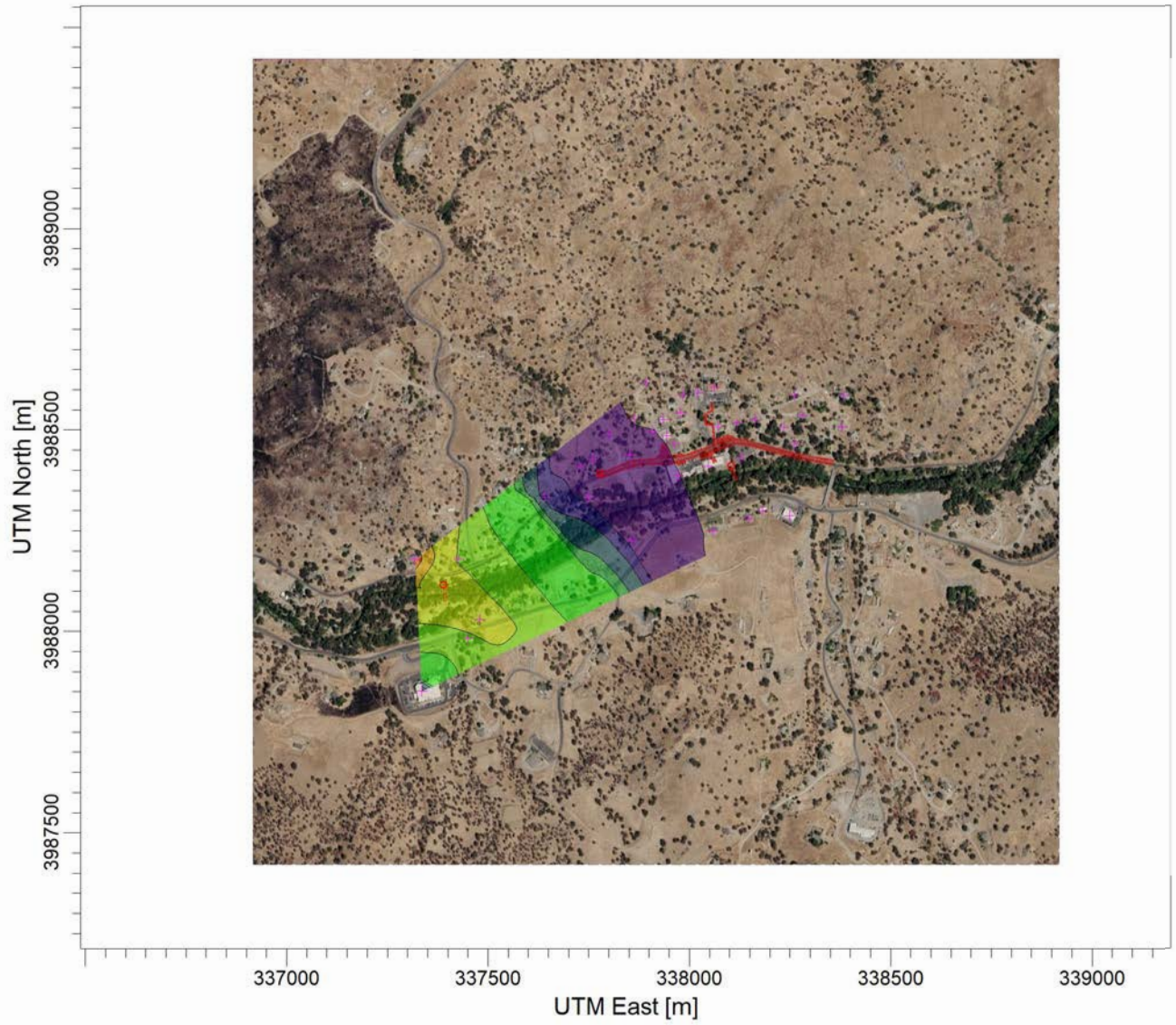
PLOT FILE OF HIGH 1ST HIGH 1-HR VALUES FOR SOURCE GROUP: PAREA2 ug/m^3

Max: 2447 [ug/m^3] at (337318.37, 3988178.59)

COMMENTS:	SOURCES: **3**	COMPANY NAME:	
	RECEPTORS: **38**	MODELER:	
	OUTPUT TYPE: **Concentration**	SCALE: 1:17,025 0 0.5 km	
	MAX: **2447 ug/m^3**	DATE: **3/13/2026**	PROJECT NO.:

PROJECT TITLE:

C:\Lakes\AERMOD View\24017 - Tule ATP HRA\24017 - Tule ATP HRA.isc



PLOT FILE OF ANNUAL VALUES AVERAGED ACROSS 4 YEARS FOR SOURCE GROUP: PAREA2 ug/m^3

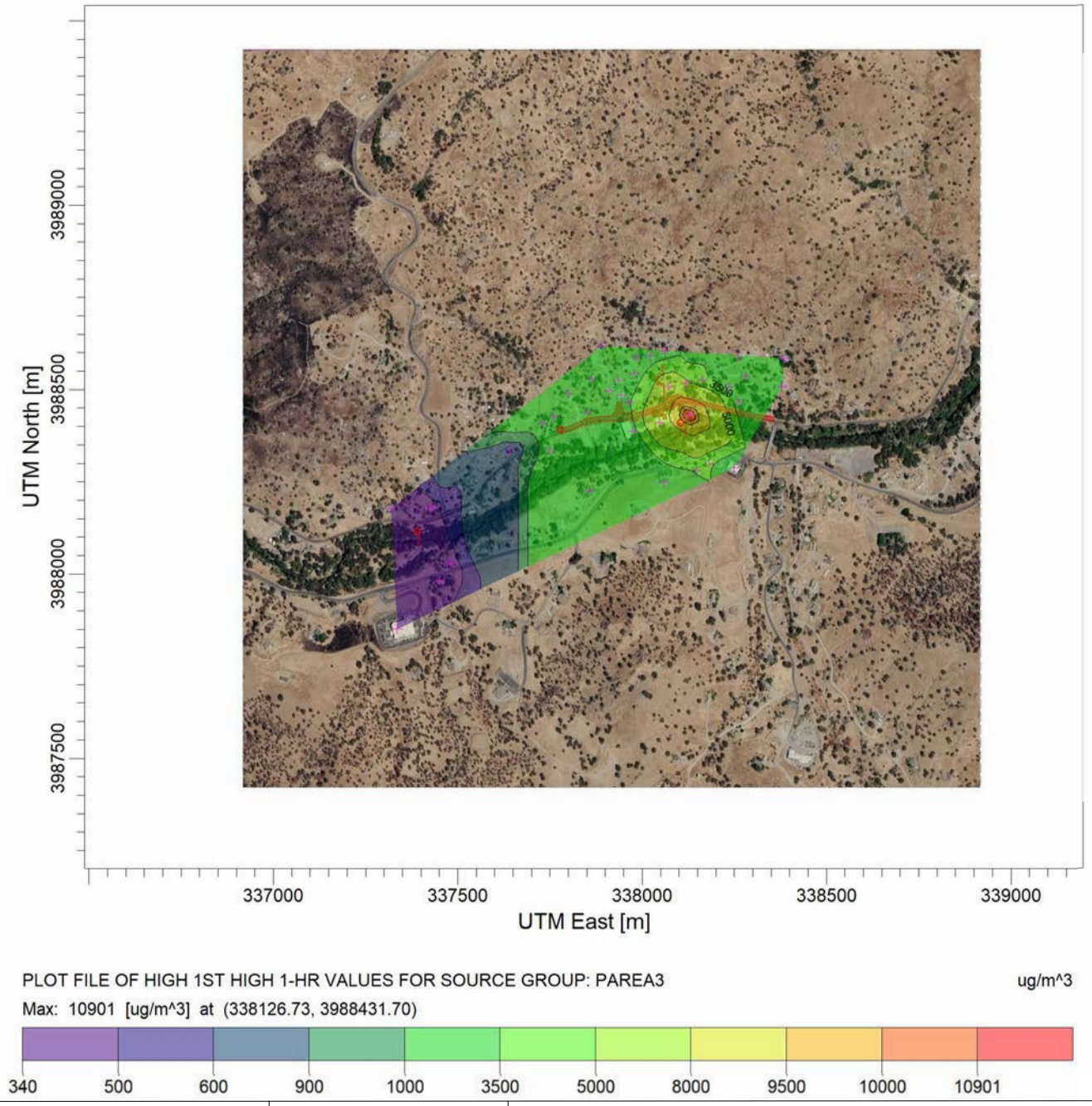
Max: 112 [ug/m^3] at (337318.37, 3988178.59)



COMMENTS:	SOURCES: **3**	COMPANY NAME:	
	RECEPTORS: **38**	MODELER:	
	OUTPUT TYPE: **Concentration**	SCALE: 1:17,025 0 0.5 km	
	MAX: **112 ug/m^3**	DATE: **3/13/2026**	PROJECT NO.:

PROJECT TITLE:

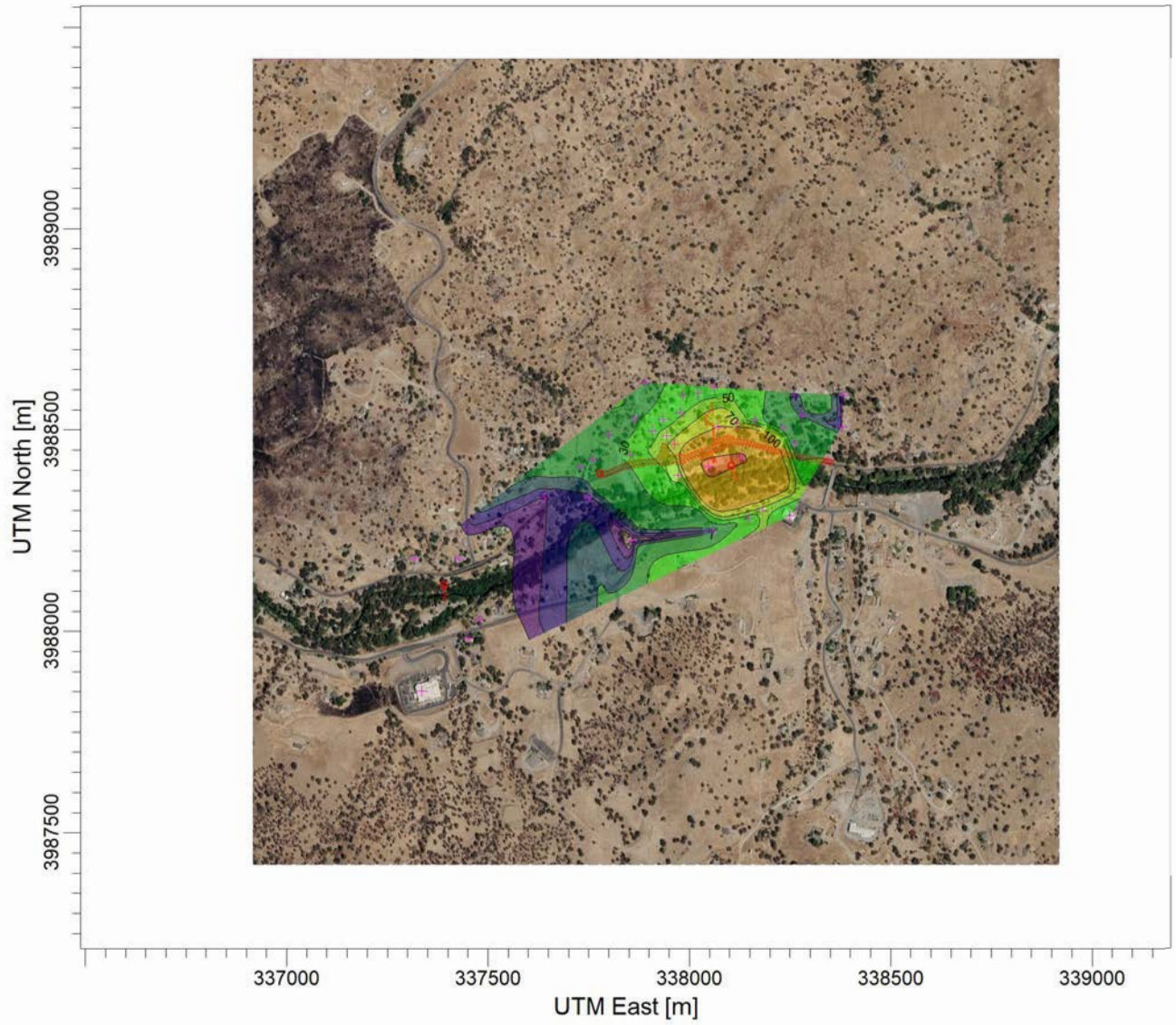
C:\Lakes\AERMOD View\24017 - Tule ATP HRA\24017 - Tule ATP HRA.isc



COMMENTS:	SOURCES: **3**	COMPANY NAME:	
	RECEPTORS: **38**	MODELER:	
	OUTPUT TYPE: **Concentration**	SCALE: 1:17,025 0 0.5 km	
	MAX: **10901 ug/m^3**	DATE: **3/13/2026**	PROJECT NO.:

PROJECT TITLE:

C:\Lakes\AERMOD View\24017 - Tule ATP HRA\24017 - Tule ATP HRA.isc



COMMENTS:	SOURCES: **3**	COMPANY NAME:	
	RECEPTORS: **38**	MODELER:	
	OUTPUT TYPE: **Concentration**	SCALE: 1:17,025 0 0.5 km	
	MAX: **362 ug/m^3**	DATE: **3/13/2026**	PROJECT NO.:

Tule ATP Phase 1
HRA Technical Report
Emissions Allocations

Project Section	Area (sqft)	Percentage
Project 1	70000	97%
Project 2 - bridge	1140	2%
Project 3 - bridge	1300	2%
TOTAL	**72440**	**1**

Total PM10 Exhaust Emisions (tpy)	0.025
Project 1 Emissions	0.024157924
Project 2 Emissions	0.000393429
Project 3 Emissions	0.000448647

Project Section	Emissions (lb/yr)
Project 1	48
Project 2 - bridge	1
Project 3 - bridge	1

HARP Project Summary Report 3/13/2026 11:14:21 PM

PROJECT INFORMATION
HARP Version: 22118
Project Name: 24017 - TULE ATP HRA
Project Output Directory: C:\HARP2\Projects\24017 - TULE ATP HRA
HARP Database: NA

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

EMISSION INVENTORY
No. of Pollutants:3
No. of Background Pollutants:0

Emissions

ScrID	StkID	ProID	PolID	PolAbbrev	Multi
	Annual Ems (lbs/yr)	MaxHr Ems (lbs/hr)	MWAF		
PAREA1	0	0	9901	DieselExhPM	1
	48	0	1		
PAREA2	0	0	9901	DieselExhPM	1
	1	0	1		
PAREA3	0	0	9901	DieselExhPM	1
	1	0	1		

Background

PolID	PolAbbrev	Conc (ug/m^3)	MWAF

Ground level concentration files (\glc\)

9901MAXHR.txt
9901PER.txt

POLLUTANT HEALTH INFORMATION
Health Database: C:\HARP2\Tables\HEALTH17320.mdb
Health Table Version: HEALTH22013
Official: True

PolID	PolAbbrev	InhCancer	OralCancer	AcuteREL
InhChronicREL	OralChronicREL	InhChronic8HRREL		

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

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

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

LIST OF RISK ASSESSMENT FILES
Health risk analysis files (\hra\)

ConstructionCancerRisk.csv
ConstructionCancerRiskSumByRec.csv
ConstructionGLCList.csv
ConstructionHRAInput.hra
ConstructionNCAcuteRisk.csv
ConstructionNCAcuteRiskSumByRec.csv
ConstructionNCChronicRisk.csv
ConstructionNCChronicRiskSumByRec.csv
ConstructionOutput.txt
ConstructionPathwayRec.csv
ConstructionPolDB.csv

Spatial averaging files (\sa\)

**HARP - Air Dispersion Modeling and Risk Tool v22118
**3/13/2026
**Exported Risk Results

REC	GRP	X	Y	RISK_SUM	SCENARIO	INHAL_RISK	SOIL_I	DERM/	MMILK	WATEI	FISH_I	CROP_	BEEF_	DAIRY	PIG_RI	CHICK	EGG_RISK
1	ALL	337729.8	3988407	3.16E-06	1YrCancerDerived_Inh	3.16E-06	0	0	0	0	0	0	0	0	0	0	0
2	ALL	337759.6	3988428	5.29E-06	1YrCancerDerived_Inh	5.29E-06	0	0	0	0	0	0	0	0	0	0	0
3	ALL	337798.6	3988490	5.80E-06	1YrCancerDerived_Inh	5.80E-06	0	0	0	0	0	0	0	0	0	0	0
4	ALL	337851.9	3988439	9.80E-06	1YrCancerDerived_Inh	9.80E-06	0	0	0	0	0	0	0	0	0	0	0
5	ALL	337908.4	3988497	9.25E-06	1YrCancerDerived_Inh	9.25E-06	0	0	0	0	0	0	0	0	0	0	0
6	ALL	337863.6	3988529	3.77E-06	1YrCancerDerived_Inh	3.77E-06	0	0	0	0	0	0	0	0	0	0	0
7	ALL	337890.2	3988618	1.76E-06	1YrCancerDerived_Inh	1.76E-06	0	0	0	0	0	0	0	0	0	0	0
8	ALL	337935.7	3988526	6.51E-06	1YrCancerDerived_Inh	6.51E-06	0	0	0	0	0	0	0	0	0	0	0
9	ALL	337943.5	3988486	1.14E-05	1YrCancerDerived_Inh	1.14E-05	0	0	0	0	0	0	0	0	0	0	0
10	ALL	337963	3988465	1.33E-05	1YrCancerDerived_Inh	1.33E-05	0	0	0	0	0	0	0	0	0	0	0
11	ALL	337976.6	3988543	5.79E-06	1YrCancerDerived_Inh	5.79E-06	0	0	0	0	0	0	0	0	0	0	0
12	ALL	337982.5	3988588	3.60E-06	1YrCancerDerived_Inh	3.60E-06	0	0	0	0	0	0	0	0	0	0	0
13	ALL	338021.5	3988592	4.15E-06	1YrCancerDerived_Inh	4.15E-06	0	0	0	0	0	0	0	0	0	0	0
14	ALL	338062.4	3988605	3.24E-06	1YrCancerDerived_Inh	3.24E-06	0	0	0	0	0	0	0	0	0	0	0
15	ALL	338070.9	3988508	1.46E-05	1YrCancerDerived_Inh	1.46E-05	0	0	0	0	0	0	0	0	0	0	0
16	ALL	338118.9	3988517	8.38E-06	1YrCancerDerived_Inh	8.38E-06	0	0	0	0	0	0	0	0	0	0	0
17	ALL	338162.5	3988525	5.35E-06	1YrCancerDerived_Inh	5.35E-06	0	0	0	0	0	0	0	0	0	0	0
18	ALL	338235.2	3988507	4.59E-06	1YrCancerDerived_Inh	4.59E-06	0	0	0	0	0	0	0	0	0	0	0
19	ALL	338260.6	3988465	7.83E-06	1YrCancerDerived_Inh	7.83E-06	0	0	0	0	0	0	0	0	0	0	0
20	ALL	338280.1	3988536	1.68E-06	1YrCancerDerived_Inh	1.68E-06	0	0	0	0	0	0	0	0	0	0	0
21	ALL	338378.8	3988508	8.30E-07	1YrCancerDerived_Inh	8.30E-07	0	0	0	0	0	0	0	0	0	0	0
22	ALL	338384	3988585	4.22E-07	1YrCancerDerived_Inh	4.22E-07	0	0	0	0	0	0	0	0	0	0	0
23	ALL	338261.2	3988586	8.53E-07	1YrCancerDerived_Inh	8.53E-07	0	0	0	0	0	0	0	0	0	0	0
24	ALL	338126.7	3988432	8.60E-06	1YrCancerDerived_Inh	8.60E-06	0	0	0	0	0	0	0	0	0	0	0
25	ALL	338249.5	3988287	1.17E-06	1YrCancerDerived_Inh	1.17E-06	0	0	0	0	0	0	0	0	0	0	0
26	ALL	338181.3	3988300	1.38E-06	1YrCancerDerived_Inh	1.38E-06	0	0	0	0	0	0	0	0	0	0	0
27	ALL	338146.9	3988280	1.21E-06	1YrCancerDerived_Inh	1.21E-06	0	0	0	0	0	0	0	0	0	0	0
28	ALL	338057.2	3988249	9.77E-07	1YrCancerDerived_Inh	9.77E-07	0	0	0	0	0	0	0	0	0	0	0
29	ALL	338046.2	3988410	8.09E-06	1YrCancerDerived_Inh	8.09E-06	0	0	0	0	0	0	0	0	0	0	0
30	ALL	337973.4	3988388	6.49E-06	1YrCancerDerived_Inh	6.49E-06	0	0	0	0	0	0	0	0	0	0	0
31	ALL	337749.7	3988333	6.16E-07	1YrCancerDerived_Inh	6.16E-07	0	0	0	0	0	0	0	0	0	0	0
32	ALL	337856.6	3988226	4.60E-07	1YrCancerDerived_Inh	4.60E-07	0	0	0	0	0	0	0	0	0	0	0
33	ALL	337641.8	3988333	5.30E-07	1YrCancerDerived_Inh	5.30E-07	0	0	0	0	0	0	0	0	0	0	0
34	ALL	337427.7	3988179	2.40E-07	1YrCancerDerived_Inh	2.40E-07	0	0	0	0	0	0	0	0	0	0	0
35	ALL	337318.4	3988179	3.91E-07	1YrCancerDerived_Inh	3.91E-07	0	0	0	0	0	0	0	0	0	0	0
36	ALL	337479.7	3988029	2.37E-07	1YrCancerDerived_Inh	2.37E-07	0	0	0	0	0	0	0	0	0	0	0
37	ALL	337450.5	3987982	1.69E-07	1YrCancerDerived_Inh	1.69E-07	0	0	0	0	0	0	0	0	0	0	0

**HARP - Air Dispersion Modeling and Risk Tool v22118

**3/13/2026

**Exported Risk Results

REC	GRP	X	Y	SCENARIO	CV	CNS	IMMUI	KIDNE	GILV	REPRC	RESP	SKIN	EYE	BONE/	ENDO	BLOOI	ODOR	GENEI	MAXHI
1	ALL	337729.8	3988407	NonCance	0	0	0	0	0	0	0.003559	0	0	0	0	0	0	0	0.003559
2	ALL	337759.6	3988428	NonCance	0	0	0	0	0	0	0.005946	0	0	0	0	0	0	0	0.005946
3	ALL	337798.6	3988490	NonCance	0	0	0	0	0	0	0.006519	0	0	0	0	0	0	0	0.006519
4	ALL	337851.9	3988439	NonCance	0	0	0	0	0	0	0.011021	0	0	0	0	0	0	0	0.011021
5	ALL	337908.4	3988497	NonCance	0	0	0	0	0	0	0.010406	0	0	0	0	0	0	0	0.010406
6	ALL	337863.6	3988529	NonCance	0	0	0	0	0	0	0.004244	0	0	0	0	0	0	0	0.004244
7	ALL	337890.2	3988618	NonCance	0	0	0	0	0	0	0.00198	0	0	0	0	0	0	0	0.00198
8	ALL	337935.7	3988526	NonCance	0	0	0	0	0	0	0.007317	0	0	0	0	0	0	0	0.007317
9	ALL	337943.5	3988486	NonCance	0	0	0	0	0	0	0.012843	0	0	0	0	0	0	0	0.012843
10	ALL	337963	3988465	NonCance	0	0	0	0	0	0	0.014926	0	0	0	0	0	0	0	0.014926
11	ALL	337976.6	3988543	NonCance	0	0	0	0	0	0	0.006506	0	0	0	0	0	0	0	0.006506
12	ALL	337982.5	3988588	NonCance	0	0	0	0	0	0	0.004052	0	0	0	0	0	0	0	0.004052
13	ALL	338021.5	3988592	NonCance	0	0	0	0	0	0	0.004667	0	0	0	0	0	0	0	0.004667
14	ALL	338062.4	3988605	NonCance	0	0	0	0	0	0	0.003642	0	0	0	0	0	0	0	0.003642
15	ALL	338070.9	3988508	NonCance	0	0	0	0	0	0	0.016451	0	0	0	0	0	0	0	0.016451
16	ALL	338118.9	3988517	NonCance	0	0	0	0	0	0	0.009428	0	0	0	0	0	0	0	0.009428
17	ALL	338162.5	3988525	NonCance	0	0	0	0	0	0	0.006014	0	0	0	0	0	0	0	0.006014
18	ALL	338235.2	3988507	NonCance	0	0	0	0	0	0	0.005159	0	0	0	0	0	0	0	0.005159
19	ALL	338260.6	3988465	NonCance	0	0	0	0	0	0	0.008808	0	0	0	0	0	0	0	0.008808
20	ALL	338280.1	3988536	NonCance	0	0	0	0	0	0	0.001887	0	0	0	0	0	0	0	0.001887
21	ALL	338378.8	3988508	NonCance	0	0	0	0	0	0	0.000933	0	0	0	0	0	0	0	0.000933
22	ALL	338384	3988585	NonCance	0	0	0	0	0	0	0.000475	0	0	0	0	0	0	0	0.000475
23	ALL	338261.2	3988586	NonCance	0	0	0	0	0	0	0.00096	0	0	0	0	0	0	0	0.00096
24	ALL	338126.7	3988432	NonCance	0	0	0	0	0	0	0.009669	0	0	0	0	0	0	0	0.009669
25	ALL	338249.5	3988287	NonCance	0	0	0	0	0	0	0.001313	0	0	0	0	0	0	0	0.001313
26	ALL	338181.3	3988300	NonCance	0	0	0	0	0	0	0.001551	0	0	0	0	0	0	0	0.001551
27	ALL	338146.9	3988280	NonCance	0	0	0	0	0	0	0.001365	0	0	0	0	0	0	0	0.001365
28	ALL	338057.2	3988249	NonCance	0	0	0	0	0	0	0.001099	0	0	0	0	0	0	0	0.001099
29	ALL	338046.2	3988410	NonCance	0	0	0	0	0	0	0.009101	0	0	0	0	0	0	0	0.009101
30	ALL	337973.4	3988388	NonCance	0	0	0	0	0	0	0.007299	0	0	0	0	0	0	0	0.007299
31	ALL	337749.7	3988333	NonCance	0	0	0	0	0	0	0.000692	0	0	0	0	0	0	0	0.000692
32	ALL	337856.6	3988226	NonCance	0	0	0	0	0	0	0.000517	0	0	0	0	0	0	0	0.000517
33	ALL	337641.8	3988333	NonCance	0	0	0	0	0	0	0.000596	0	0	0	0	0	0	0	0.000596
34	ALL	337427.7	3988179	NonCance	0	0	0	0	0	0	0.00027	0	0	0	0	0	0	0	0.00027
35	ALL	337318.4	3988179	NonCance	0	0	0	0	0	0	0.000439	0	0	0	0	0	0	0	0.000439
36	ALL	337479.7	3988029	NonCance	0	0	0	0	0	0	0.000266	0	0	0	0	0	0	0	0.000266
37	ALL	337450.5	3987982	NonCance	0	0	0	0	0	0	0.00019	0	0	0	0	0	0	0	0.00019

Appendix B

Biological Analysis

TULE RIVER ACTIVE TRANSPORTATION PLAN – PHASE 1
BIOLOGICAL EVALUATION

TULE RIVER RESERVATION
TULARE COUNTY, CALIFORNIA

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1.0 INTRODUCTION

This technical report, prepared by Live Oak Associates, Inc. (LOA) to facilitate compliance with the California Environmental Quality Act (CEQA) and National Environmental Policy Act (NEPA), describes the biotic resources of lands that may be affected by implementation of the proposed Tule River Active Transportation Plan – Phase 1 ("project"), and evaluates potential impacts to those resources that could result from the project. The project consists of various improvements aimed at pedestrian safety in and around the Village Center of the Tule River Reservation ("Reservation"), located in Tulare County, California (Figure 1). The project's area of potential effect, or study area, encompasses approximately 50 acres. It may be found on the *Globe* U.S. Geological Survey (USGS) 7.5-minute quadrangle in Section 12 of Township 22 South, Range 29 East, Mount Diablo Base and Meridian (Figure 2).

1.1 PROJECT DESCRIPTION

The proposed project predominantly consists of two new pedestrian bridge crossings. Generally, the project would provide safer routes for pedestrians to cross the South Fork Tule River to access an education center and gymnasium. Specific project elements include:

1. Replacement of an existing pedestrian swinging bridge over South Fork Tule River
2. New pedestrian bridge over South Fork Tule River to connect Cow Mountain Road (north) and the pedestrian corridor to the Justice Center (south)
3. Class 1 trail
4. Approximately 3,765 SF of concrete sidewalk
5. Seven (7) accessible curb ramps
6. Two (2) streetlights for the N. Reservation Road corridor
7. Eight (8) new solar-powered Rectangular Rapid Flashing Beacons (RRFBs) at four locations; two RRFBs per location assumed
8. Two (2) raised pedestrian crossings
9. Reconfiguration of back-in-angled parking stalls
10. Landscaping and irrigation for the length of the project
11. Signing and pavement delineation for the corridor, including pedestrian bridges

Figure 1. Vicinity.

Figure 2. USGS.

1.2 REPORT OBJECTIVES

This report summarizes a biological study conducted by LOA to facilitate environmental review pursuant to CEQA and NEPA. As such, the report's objectives are to:

- Characterize the study area's existing biological resources, including biotic habitats, flora and fauna, soils, and aquatic resources.
- Evaluate the study area's potential to support sensitive resources such as special status species, sensitive natural communities, and jurisdictional waters and wetlands.
- Summarize all state and federal natural resource protection laws that may be relevant to project implementation.
- Identify and discuss potential project-related impacts to biological resources within the context of CEQA, NEPA, and other state and federal laws.
- Identify avoidance and mitigation measures that would reduce the magnitude of project-related impacts in a manner consistent with CEQA, NEPA, and species-specific guidelines.

1.3 STUDY METHODOLOGY

A reconnaissance-level field survey of the study area was conducted on February 2, 2026 by LOA biologist Natalie Neff. The survey entailed walking and driving through the study area while identifying its principal biotic habitats and land uses, identifying all vascular plants and terrestrial wildlife species encountered, and assessing the study area's suitability for special status species. The survey did not include an aquatic resources delineation; however, areas potentially subject to the jurisdiction of the U.S. Army Corps of Engineers (USACE) were noted.

LOA conducted an analysis of potential project impacts based on the known and potential biotic resources of the study area discussed in Section 2.0. Sources of information used in the preparation of this analysis included: (1) results of the February 2026 reconnaissance-level surveys, (2) the *California Natural Diversity Data Base* (CDFW 2025), (3) the *Online Inventory of Rare and Endangered Vascular Plants of California* (CNPS 2025), and (4) manuals, reports, and references related to plants and animals of the San Joaquin Valley region.

2.0 EXISTING CONDITIONS

2.1 REGIONAL SETTING

The study area is located within the low foothills of the southern Sierra Nevada, in a transition zone from the Central Valley to the Sierra Nevada. The topography of the area consists of gentle to steeply sloped terrain.

Like most of California, this region of the Sierra Nevada foothills has a Mediterranean climate. Warm, dry summers are followed by cool, moist winters with spring and fall as transitional seasons. Summer temperatures commonly exceed 90 degrees Fahrenheit, and the relative humidity is generally very low. Winter temperatures rarely rise much above 70 degrees Fahrenheit, and daytime high temperatures are often below 60 degrees Fahrenheit. Annual precipitation at the nearest NOAA weather station, Springville, is about 16.5 inches, nearly all of which falls during fall and winter months (NOAA 2021).

The principal drainage of the project vicinity is the South Fork Tule River, which bisects the study area latitudinally. The South Fork Tule River originates near the summit of Slate Peak, approximately 12 miles northeast of the study area. It flows through the study area from east to west, ultimately exiting the Reservation and joining the main stem of the Tule River at Lake Success. Downstream of Lake Success, the Tule River historically flowed into Tulare Lake; however, agricultural diversions have eliminated the lake and greatly degraded the Tule River itself.

2.2 STUDY AREA

The study area is characterized by a mix of developed and undeveloped lands. Developed lands include the Village Center area and rural residences along both sides of the South Fork Tule River. Undeveloped lands consist of an approximately 0.6-mile-long reach of the river and an associated woodland corridor.

The study area has an overall western aspect, reflecting the gradient of the river corridor. Elevations range from approximately 1,100 feet above sea level in the northeastern corner of the study area to approximately 1,000 feet at the western boundary.

The study area contains three soil mapping units: Blasingame-Rock outcrop complex, 9 to 50 percent slopes; Blasingame sandy loam, 15 to 30 percent slopes; and Xerofluvents, flooded (California Soil Resource Lab 2008). The latter mapping unit generally conforms to the on-site reach of the South Fork Tule River corridor, and is associated with drainageways and alluvial fans elsewhere in the region. It is considered hydric, meaning it has the propensity to pond water and support hydrophytic (water-loving) vegetation. The Blasingame mapping units are both non-hydric (NRCS 2026).

A list of vascular plants identified on the site is presented in Appendix A. A list of terrestrial vertebrates using or potentially using the study area is presented in Appendix B. Representative photos of the site are presented in Appendix C.

2.3 BIOTIC HABITATS / LAND USES

The study area contains two broad habitat / land use types: ruderal/developed and river corridor (Figure 3). These habitats / land uses are described in more detail in the following sections.

2.3.1 Ruderal/Developed

The majority of the study area comprises ruderal/developed lands including community facilities, rural residential properties, paved and dirt roads, and the disturbed margins of these uses. The study area's community facilities are concentrated in the Village Center and include tribal government buildings, a school, a gym, a church, a waste transfer station, parks, and various other public spaces. Where vegetation was present in these spaces at the time of the survey, it consisted largely of introduced species such as annual bluegrass (*Poa annua*) used as turf, and oleander (*Nerium oleander*) and Aleppo pine (*Pinus halepensis*) used in landscaping. Remnant native trees were distributed sporadically through these areas and included western redbud (*Cercis occidentalis*), California sycamore (*Platanus racemosa*), and blue oak (*Quercus douglasii*).

The rural residential properties include homes, outbuildings, landscaping, parking and storage areas, and several backyard pastures. At the time of LOA's survey, the rural residential properties had significantly more vegetative diversity than the Village Center, supporting a mix

Figure 3. Biotic Habitats / Land Uses.

of native species and both ornamental and naturalized non-natives. Representative trees on the rural residential properties included blue oak, gray pine (*Pinus sabiniana*), eucalyptus (*Eucalyptus* sp.), and citrus (*Citrus* sp.). Understory species included wild oats (*Avena* sp.), foxtail barley (*Hordeum murinum*), lavender (*Lavandula* sp.), boxwood (*Buxus* sp.), and cactus. The study area's roads, while themselves barren of vegetation, supported a mix of native and non-native grasses and forbs along their margins including barnyard grass (*Echinochloa crus-galli*), fiddleneck (*Amsinckia* sp.), and bluedicks (*Dipterostemon capitatus*).

The study area's ruderal/developed lands would be used to different degrees by locally occurring wildlife, with most species exhibiting some amount of tolerance for human disturbance. Reptiles that could be found in the study area's ruderal/developed lands include the western fence lizard (*Sceloporus occidentalisi*), California alligator lizard (*Elgaria multicarinata multicarinata*), and gopher snake (*Pituophis melanoleucus*). Amphibians such as the Sierran treefrog (*Pseudacris sierra*) and western toad (*Anaxyrus boreas*) may breed in the river and subsequently disperse into the study area's ruderal/developed lands.

Trees and shrubs in the study area's ruderal/developed lands could support nesting by American robins (*Turdus migratorius*), Anna's hummingbirds (*Calypte anna*), northern mockingbirds (*Mimus polyglottos*), and mourning doves (*Zenaida macroura*), among other species. Mourning doves may also nest in ground vegetation. The disturbance-tolerant killdeer (*Charadrius vociferus*) preferentially nests on bare ground and may utilize the study area's dirt parking or storage areas, pastures, and other sparsely vegetated locations to this end. Various birds attracted to the built environment, including the house finch (*Haemorhous mexicanus*) and house sparrow (*Passer domesticus*), may nest in or on buildings in the study area's ruderal/developed lands. All of the aforementioned birds may also forage on these lands, as could winter migrants such as the savannah sparrow (*Passerculus sandwichensis*) and yellow-rumped warbler (*Dendroica coronata*).

Small mammal species likely to occur in the study area's ruderal/developed lands include the deer mouse (*Peromyscus maniculatus)*, house mouse (*Mus musculus*), and Norway rat (*Rattus norvegicus*), among others. Burrowing rodent use of these areas is expected to include California ground squirrels (*Otospermophilus beecheyi*) and Botta's pocket gophers (*Thomomys bottae*).

Disturbance-tolerant mammalian predators such as raccoons (*Procyon lotor*) and striped skunks (*Mephitis mephitis*) are expected to regularly forage in or pass through the site's ruderal/developed lands. Various bat species may roost in trees or buildings within this land use type and may forage in or over these areas.

2.3.2 River Corridor

The study area contains an approximately 0.6-mile-long reach of the South Fork Tule River. The river is flanked by riparian woodland habitat within the floodplain and several areas of oak woodland in the adjoining uplands. At the time of LOA's survey, the river was inundated and flowing. The river bed was rocky and primarily unvegetated; however, tall flatsedge (*Cyperus eragrostic*), stinging nettle (*Urtica dioica*), and barnyard grass were observed along the waterline at some locations. The riparian woodland was characterized by an overstory of California sycamore, Oregon ash (*Fraxinus latifolia*), red willow (*Salix laevigata*), and California bay-laurel (*Umbellularia californica*). Shrubs in the mid- to understory included California blackberry (*Rubus ursinus*), California grape (*Vitis californica*), mule fat (*Baccharis salicifolia*), foothill gooseberry (*Ribes quercetorum*), and poison oak (*Toxicodendron diversilobum*). Grasses and forbs included barnyard grass, mugwort (*Artemisia douglasiana*), chickweed (*Stellaria media*), miner's lettuce (*Claytonia perfoliata*), and many other species. Outside of the river banks, woodland habitat transitioned to upland trees and shrubs such as gray pine, blue oak, and interior live oak (*Quercus wislizenii*). Understory species in these dry woodlands included wild oats, barnyard grass, and various forbs.

The South Fork Tule River within the study area is perennially inundated. It supports various fish species including the native rainbow trout (*Oncorhynchus mykiss*) and non-native brown trout (*Salmo trutta*). It is likely to support breeding by common amphibians such as the Sierran treefrog and western toad. It may also support populations of the western pond turtle (*Actinemys marmorata*), a species proposed for listing as threatened under the federal Endangered Species Act. Pond turtles have been documented in the South Fork Tule River in the past (CDFW 2026a), and LOA documented populations of this species in Rocky Creek, a tributary that joins the river approximately 2.5 miles east of study area boundaries. Various birds may forage in or

over the river's aquatic habitat; these include the belted kingfisher (*Megaceryle alcyon*), black phoebe (*Sayornis nigricans*), and great blue heron (*Ardea herodias*), among others.

The woodlands flanking the river are likely to support a large number of wildlife species. Expected reptiles include the common gartersnake (*Thamnophis sirtalis*), striped racer (*Coluber lateralis*), and western rattlesnake (*Crotalus oreganus*). Additionally, if western pond turtles occur along this stretch of the river, they may overwinter and/or nest in the adjoining woodlands; the latter activity would be limited to sunny openings with sparse vegetation and dry soils.

Songbirds likely to use woodland habitats along the study area's river corridor include cover-associated species such as the Bewick's wren (*Thryomanes bewickii*), house wren (*Troglodytes aedon*), and lesser goldfinch (*Spinus psaltria*), riparian-associated species such as the song sparrow (*Melospiza melodia*) and common yellowthroat (*Geothlypis trichas*), and many others. Raptors commonly associated with riparian corridors include the red-shouldered hawk (*Buteo lineatus*). Other raptors likely to nest and/or forage in this area include the Cooper's hawk (*Accipiter cooperii*) and sharp-shinned hawk (*Accipiter striatus*).

Small mammal use of these woodlands is expected to include the Botta's pocket gopher, deer mouse, California mouse (*Peromyscus californicus*), California vole (*Microtus californicus*), and western gray squirrel (*Sciurus griseus*). Larger mammals likely to occupy or travel through the woodlands of the river corridor include the mule deer (*Odocoileus hemionus*), coyote (*Canis latrans*), gray fox (*Urocyon cinereoargenteus*), cougar (*Puma concolor*), bobcat (*Lynx rufus*), raccoon, and striped skunk. Various bat species are expected to forage and roost in this habitat, as well.

2.4 SPECIAL STATUS PLANTS AND ANIMALS

Many species of plants and animals within the state of California have low populations, limited distributions, or both. Such species may be considered "rare" and are vulnerable to extirpation as the state's human population grows and the habitats these species occupy are converted to agricultural and urban uses. As described more fully in Section 3.0, state and federal laws have provided California Department of Fish and Wildlife (CDFW) and the U.S. Fish and Wildlife Service (USFWS) with a mechanism for conserving and protecting the diversity of plant and

animal species native to the state. A sizable number of native plants and animals have been formally designated as threatened or endangered under state and federal endangered species legislation. Others have been designated as "candidates" for such listing. Still others have been designated as "species of special concern" by the CDFW. The California Native Plant Society (CNPS) has developed its own set of lists (i.e., California Rare Plant Ranks, or CRPR) of native plants considered rare, threatened, or endangered (CNPS 2026). Collectively, these plants and animals are referred to as "special status species."

The California Natural Diversity Data Base (CNDDB; CDFW 2026a) was queried for special status plant and animal occurrences in the nine USGS 7.5-minute quadrangles containing and surrounding the study area (*Globe, Frazier Valley, Springville, Camp Wishon, Solo Peak, California Hot Springs, Gibbon Peak, Fountain Springs,* and *Success Dam*). An unofficial species list for the project vicinity was obtained using the USFWS Information for Planning and Consultation (IPaC) system (Appendix D). A number of special status plants and animals were returned in these queries and are summarized below in Table 1. Sources of information for this table included *California's Wildlife, Volumes I, II, and III* (Zeiner et. al 1988-1990), *The Jepson Manual: Vascular Plants of California, second edition* (Baldwin et al 2012), the *California Native Plant Society's Inventory of Rare and Endangered Vascular Plants of California* (CNPS 2025), *Calflora.org, iNaturalist.org*, and *eBird.org*.

TABLE 1. LIST OF SPECIAL STATUS SPECIES THAT COULD OCCUR IN THE PROJECT VICINITY.

PLANTS

Species Listed as Threatened or Endangered under the State and/or Federal Endangered Species Act

Species	Status	Habitat/Range	Occurrence on the Study Area
Kaweah brodiaea (*Brodiaea insignis*)	CE, CRPR 1B	Found on grassy, south-facing to west-facing slopes in blue oak woodland habitat, where it grows in association with heavy clay soils over a granitic substrate. It is typically found between 800 and 1,600 feet in elevation. Blooms April-June.	**Absent.** The study area lacks suitable soils for this species.
Springville clarkia (*Clarkia springvillensis*)	FT, CE, CRPR 1B	Found on granitic soils in sunny locations including the uphill slope of roadbanks, small decomposing granite domes, and openings in blue oak woodland or chaparral habitat, typically between 1,220 and 3,000 feet in elevation. Blooms May-July.	**Unlikely.** The study area lacks granitic soils and is located below this species' typical elevational distribution. All known Springville clarkia populations on the Reservation are at elevations above 1,600 feet.
Striped adobe-lily (*Fritillaria striata*)	CT, CRPR 1B	Found in heavy clay adobe soils in oak savannah, at elevations between 450 and 4,800 feet. Blooms February to April.	**Absent.** Suitable habitat and soils are absent from the study area.
San Joaquin woollythreads (*Monolopia congdonii*)	FE, CRPR 1B	Found in sandy or silty soils within chenopod scrub and grassland habitats. Although this species is known from elevations up to 2,600 feet in Santa Barbara and San Luis Obispo Counties, its upper elevation limit in the San Joaquin Valley and surrounding hills is approximately 850 feet (ESRP 2022). Blooms February-May.	**Absent.** The study area is above the elevational range of this species in the region.
San Joaquin adobe sunburst (*Pseudobahia peirsonii*)	FT, CE, CRPR 1B	Found in grasslands and in the transition zone between grassland and blue oak woodland at elevations between 300 and 2,600 feet. All known occurrences are associated with Cibo clay, Porterville clay, Centerville clay, or Mt. Olive clay soils. Blooms March- April.	**Absent.** Clay soils required by this species are absent from the study area.
Keck's checkerbloom (*Sidalcea keckii*)	FE, CRPR 1B	Known from three locations in the southern Sierra Nevada, where it grows in grasslands and grassy openings in blue oak woodland habitats up to 2,100 feet in elevation. Found in association with gabbro or serpentine-derived, clay soils. Blooms April-May.	**Absent.** Clay soils required by this species are absent from the study area.

TABLE 1. LIST OF SPECIAL STATUS SPECIES THAT COULD OCCUR IN THE PROJECT VICINITY

PLANTS (cont'd)

CNPS-Listed Species

Species	Status	Habitat/Range	Occurrence on the Study Area
Abrams' onion (*Allium abramsii*)	CRPR 1B	Occurs in granitic sand between 3,000 and 6,500 feet in elevation. Blooms May-July.	**Absent.** The study area is well below the elevational range of this species.
Shirley Meadows star-tulip (*Calochortus westonii*)	CRPR 1B	Found in broad-leafed upland forest, lower montane coniferous forest, and meadows at elevations between 4,920 and 6,905 feet. Blooms May-June.	**Absent.** The study area is well below the elevational range of this species.
Bolander's woodreed (*Cinna bolanderi*)	CRPR 1B	Found in meadows and seeps in upper montane coniferous forest at elevations between 5,480 and 8,005 feet. Blooms July-September.	**Absent.** The study area is well below the elevational range of this species.
Tulare cryptantha (*Cryptantha incana*)	CRPR 1B	Occurs in gravelly or rocky areas of lower montane coniferous forest at elevations between 4,690 and 7,055 feet. Blooms June-August.	**Absent.** The study area is well below the elevational range of this species.
Unexpected larkspur (*Delphinium inopinum*)	CRPR 4.3	Occurs on open rocky ridgetops in red fir and western white pine forest at elevations between 6,200 and 9,200 feet. Blooms May-July.	**Absent.** The study area is well below the elevational range of this species.
Rose-flowered larkspur (*Delphinium purpusii*)	CRPR 1B	Found in chaparral and woodland habitats with rocky soils at elevations between 985 and 4,395 feet. Blooms April-May.	**Possible.** Woodland habitats within the study area's river corridor are potentially suitable for the rose-flowered larkspur. Populations of this species have been documented elsewhere in the foothills of Tulare and Kern Counties.
Recurved larkspur (*Delphinium recurvatum*)	CRPR 1B	Found in alkaline soils in chenopod scrub, grassland, and woodland habitats up to 2,590 feet in elevation. Blooms March-June.	**Absent.** The study area does not contain alkaline soils.
Calico monkeyflower (*Diplacus pictus*)	CRPR 1B	Found in foothill woodland habitats, often on bare ground around gooseberry bushes or around granite rock outcrops. Elevations between 450 and 4,100 feet; blooms March-May.	**Possible.** Woodland habitats within the study area's river corridor are potentially suitable for the calico monkeyflower. Gooseberry, a preferred plant associate, was noted in these areas at the time of the survey. Populations of this species have been documented elsewhere in the foothills of Tulare and Kern Counties.
Pierpoint Springs dudleya (*Dudleya cymosa* ssp. *costafolia*)	CRPR 1B	Occurs in chaparral and cismontane woodlands on carbonate soil at elevations between 4,710 and 5,250 feet. Blooms May-July	**Absent.** The study area is well below the elevational range of this species.
Tracy's eriastrum (*Eriastrum tracyi)*	CRPR 3.2	Grows in gravelly shale or clay, often in open areas, within chaparral, woodland, and grassland habitats at elevations between 1,035 and 5,840 feet. Blooms May-July.	**Unlikely.** The study area is at the upper limit of this species' elevational distribution and lacks suitable soils and microsite conditions.
Keil's daisy (*Erigeron inornatus* var. *keilii)*	CRPR 1B	Found in meadows and seeps within lower montane coniferous forest at elevations between 5,905 and 7,220 feet. Blooms June-September.	**Absent.** The study area is well below the elevational range of this species.

TABLE 1. LIST OF SPECIAL STATUS SPECIES THAT COULD OCCUR IN THE PROJECT VICINITY

PLANTS (cont'd)

CNPS-Listed Species

Species	Status	Habitat/Range	Occurrence on the Study Area
Spiny-sepaled button celery (*Eryngium spinosepalum*)	CRPR 1B	Occurs in vernal pools and swales within valley and foothill grasslands, at elevations between 260 and 3,200 feet. Blooms April-July.	**Absent.** Suitable habitat is absent from the study area.
Greenhorn fritillary (*Fritillaria brandegeei*)	CRPR 1B	Occurs in lower montane coniferous forest, generally on granitic soils, at elevations between 4,365 and 6,890 feet. Blooms April-June	**Absent.** The study area is well below the elevational range of this species.
Munz's iris (*Iris munzii*)	CRPR 1B	Found in woodland habitats with granitic moist sandy loam soil, often along streams, at elevations 1,100-2,400 feet. Blooms March-April.	**Possible.** The Munz's iris has previously been observed along the South Fork Tule River on or in the near vicinity of the study area. There is a 1965 CNDDB occurrence mapped to an approximately 2-mile-long reach of the river, the downstream limits of which are within study area boundaries. The study area's river corridor contains suitable habitats and soils for the Munz's iris and has the potential to support extant populations of this species.
Madera leptosiphon (*Leptosiphon serrulatus*)	CRPR 1B	Found on dry slopes, often on decomposed granite, in woodland and coniferous forest habitats between 1,000 and 4,300 feet in elevation. Blooms April-May.	**Unlikely.** The study area lacks microsite conditions favorable for this species. All known records of the Madera leptosiphon from the last 50 years are located well north of the study area in Fresno and Madera Counties (CDFW 2026a, iNaturalist 2026).
Shining navarretia (*Navarretia nigelliformis* ssp. *radians*)	CRPR 1B	Found in woodland and grassland habitats, sometimes in clay soils. Elevation 215-3,300 feet; blooms May-July.	**Unlikely.** The study area contains potentially suitable habitat for the shining navarretia. However, only one population of this species is known from Tulare County, documented near Lake Success in 2016 (CDFW 2026a). All other known populations are in the coast ranges or the Central Valley north of Fresno County (CDFW 2026a, iNaturalist 2026).
Chaparral ragwort (*Senecio aphanactis*)	CRPR 2B	Found in chaparral, woodland, and coastal scrub habitats, often in association with drying alkaline flats, at elevations up to 2,600 feet. Blooms January-April.	**Unlikely.** The study area lacks microsite conditions favorable for the chaparral ragwort. There is only one known record of this species in Tulare County, documented near Lake Success in 1982 (CDFW 2026a). All other known populations are in the coast ranges (CDFW 2026a, iNaturalist 2026).
Grey-leaved violet (*Viola pinetorum ssp. grisea*)	CRPR 2B	Found on dry mountain peaks and slopes at elevations between 4,920 and 11,155 feet. Blooms April-July.	**Absent.** The study area is well below the elevational range of this species.

TABLE 1. LIST OF SPECIAL STATUS SPECIES THAT COULD OCCUR IN THE PROJECT VICINITY

ANIMALS (cont'd)

Species Listed as Threatened or Endangered under the State and/or Federal Endangered Species Act

Species	Status	Habitat/Range	Occurrence on the Study Area
Monarch butterfly (*Danaus plexippus*)	FPT	Overwinters in coastal California and Baja California and breeds throughout California in the spring and summer along its annual migration north and east. The adult monarch lays its eggs on obligate milkweed (*Asclepias* spp.) host plants, which the resultant larvae feed on before pupating and emerging as adults to continue the migratory journey. In addition to milkweed, this species requires abundant nectar resources to nourish migrating adults, and trees for roosting during migratory stopovers.	**Possible.** The study area's river corridor and rural residential properties contain nectar resources and trees suitable for monarch foraging and roosting, respectively. No milkweed was observed on site during LOA's survey; however, the survey was conducted prior to typical springtime milkweed emergence and did not provide full visual coverage of the study area. If the study area contains milkweed, then it could support monarch reproduction in addition to foraging and roosting.
Valley elderberry longhorn beetle (*Desmocerus californicus dimorphus*)	FT	Found in blue elderberry shrubs at elevations up to 3,000 feet. This species' range does not include Tulare, Kern, or Kings Counties.	**Absent.** The site is outside the range of this species.
Crotch's bumble bee (*Bombus crotchii*)	CCE	Inhabits open grassland and scrub habitats of the southern 2/3 of California. Historically in, but largely extirpated from, the Central Valley. Constructs nests underground in animal burrows. Overwintering sites are likely in soft soils or in debris or leaf litter. Forages on flowering plants of the Fabaceae, Apocynaceae, Asteraceae, Lamiaceae, Hydrophyllaceae, Asclepiadaceae, and Boraginaceae families	**Possible**. The study area's river corridor and rural residential properties contain potential foraging, nesting, and overwintering habitat for the Crotch's bumble bee. There are a number of modern occurrences of this species in the Tulare County foothills, including a 2023 record approximately 2.5 miles east of study area boundaries along Rocky Creek (CDFW 2026a, iNaturalist 2026).
Western spadefoot (*Spea hammondii*)	FPT, CSC	Occurs in grasslands of San Joaquin Valley, where it breeds in vernal pools or other seasonal wetlands and aestivates in underground refugia such as rodent burrows. Baumberger et al. (2019) recorded a maximum distance of around 860 feet between breeding and aestivation sites.	**Absent.** Suitable breeding habitat is absent from the study area and surrounding lands within a distance that would allow this species to access the site.
Foothill yellow-legged frog - south Sierra DPS (*Rana boylii pop. 5*)	FE, CSC	Found in streams and rivers with a rocky substrate and open, sunny banks, most commonly below 4,500 feet in elevation. Although it is most often associated with perennial waters, it may sometimes be found in isolated pools in ephemeral or intermittent streams. May use riparian and other moist terrestrial habitats in close proximity to streams.	**Unlikely.** Although the study area's riverine and riparian habitats are potentially suitable for the foothill yellow-legged frog, LOA is not aware of any documented populations of this species in the South Fork Tule River watershed (CDFW 2026a, iNaturalist 2026). Of the 12 CNDDB occurrence records within 15 miles of study area boundaries, all but one are considered extirpated. The remaining record is from 2004 and describes a population in the North Fork Tule River, approximately 11 miles north of study area boundaries (CDFW 2026a).

TABLE 1. LIST OF SPECIAL STATUS SPECIES THAT COULD OCCUR IN THE PROJECT VICINITY

ANIMALS (cont'd)

Species Listed as Threatened or Endangered under the State and/or Federal Endangered Species Act

Species	Status	Habitat/Range	Occurrence on the Study Area
Southern mountain yellow-legged frog (*Rana muscosa*)	FE, CE	Inhabits streams in ponderosa pine, montane hardwood-conifer, and montane riparian habitats at elevations from 4,500 to over 12,000 feet in the Sierra Nevada.	**Absent.** The study area is well below the elevational distribution of this species.
Western pond turtle (*Actinemys marmorata*)	FPT, CSC	Occurs in ponds, lakes, rivers, creeks, marshes, and irrigation ditches with abundant vegetation, within woodland, forest, and grassland habitats. Logs, rocks, cattail mats, and exposed banks may be used for basking. Nesting takes place in open areas, on a variety of soil types, and up to ¼ mile away from water. May overwinter underwater or in woodland habitats, where they bury themselves in loose soil or take shelter in ground squirrel burrows.	**Possible.** The South Fork Tule River within the study area provides suitable aquatic habitat for this species. Turtles may nest in open areas of the adjoining woodlands and residential properties, and may overwinter in undeveloped portions of the site. Pond turtles have been documented within the South Fork Tule River in the past; the CNDDB lists a 1988 occurrence that encompasses the river's full reach through the Reservation, including the study area (CDFW 2026a). Extant pond turtle populations are known from Rocky Creek, a tributary to the South Fork Tule River located several miles upstream of study area boundaries (LOA pers. obs.).
California condor (*Gymnogyps californianus*)	FE, CE, CFP	Found in vast expanses of open savannah, grasslands, and foothill chaparral in mountain ranges of moderate altitude. Primarily a cavity-nesting species, condors lay their eggs in rock crevices and potholes, on overhung cliff ledges, and in burned-out hollows of old-growth conifers. This species is an obligate scavenger, reliant on sources of carrion in open habitats that permit visibility and easy approach. Condors communally roost in rocky outcrops and tall trees or snags with a high degree of peripheral visibility and unobstructed space for take-off. Condors in the project vicinity are from the southern California flock, most recently estimated at 101 free-flying individuals (USFWS 2024).	**Unlikely.** While condors from the southern California flock are frequently detected in the Reservation's grassland and woodland habitats (USFWS 2020), they are unlikely to be attracted to the study area itself. The study area is located in the most densely populated area of the Reservation, with considerable development and high levels of ambient disturbance. It lacks open areas with reliable sources of carrion for foraging and does not contain trees or snags with structural characteristics conducive to roosting. Nesting habitat is also absent.
Tricolored blackbird (*Agelaius tricolor*)	CT, CSC	Nests colonially near fresh water in dense cattails or tules, large patches of Himalayan blackberry (*Rubus armeniacus*), or thickets of willows or shrubs. In the San Joaquin Valley, has increasingly been documented nesting in grain fields. Forages in grassland and cropland areas.	**Unlikely.** This study area is characterized by tree-dominated habitats and developed areas, neither of which reflect the use patterns of this open country species. The study area does not contain favorable microsite conditions for nesting and lacks suitable foraging habitat.

TABLE 1. LIST OF SPECIAL STATUS SPECIES THAT COULD OCCUR IN THE PROJECT VICINITY

ANIMALS (cont'd)

Species Listed as Threatened or Endangered under the State and/or Federal Endangered Species Act

Species	Status	Habitat/Range	Occurrence on the Study Area
Wolverine (*Gulo gulo*)	CT, CFP	Occurs primarily in mixed and red fir and subalpine and wet meadow habitats at high elevations. Requires huge tracts of land for its extensive home range movements.	**Absent.** The study area is well below the elevational range of this species. Moreover, modern wolverine detections in California appear limited to just two individuals: one sighted in the Lake Tahoe area between 2008 and 2018, and another in Yosemite National Park and the Inyo National Forest in the spring of 2023.
Fisher – southern Sierra Nevada ESU (*Pekania pennanti pop. 2*)	FE, CT	Found in intermediate to large-tree stages of coniferous forests and deciduous-riparian areas with high percent canopy closure, typically between 4,500 and 7,000 feet in elevation. Near the southern limits of the population, where the Tule River Reservation is located, fishers are most common between 6,000 and 7,000 feet. Uses cavities, snags, logs and rocky areas for cover and denning.	**Absent.** The study area does not contain habitat for this species and is well below its elevational range.
San Joaquin Kit Fox (*Vulpes macrotis mutica*)	FE, CT	Frequents desert alkali scrub and annual grasslands and may forage in adjacent agricultural habitats. Utilizes enlarged (6 to 10 inches in diameter) ground squirrel burrows as denning habitat. May become adapted to urban areas, as has occurred in Bakersfield, Coalinga, and Taft (Cypher et al. 2012).	**Absent.** The study area lacks suitable habitat for this species and is outside of its known distribution. The closest CNDDB occurrences, historic or modern, are located more than 10 miles from study area boundaries at the eastern margin of the San Joaquin Valley (CDFW 2026a).

California Species of Special Concern

Northern California legless lizard (*Aniella pulchra*)	CSC	Occurs in sparsely vegetated areas of beach dunes, chaparral, pine-oak woodlands, desert scrub, sandy washes, and stream terraces with sycamores, cottonwoods, or oaks. Requires warm, loose soil with high moisture content.	**Possible.** The study area's river corridor provides suitable habitat for the northern California legless lizard. LOA is not aware of this species having been documented on the Reservation, but there are several occurrence records elsewhere in eastern Tulare County, including a 2017 detection along the mainstem Tule River near Springville (CDFW 2026a).
Black swift (*Cypseloides niger*)	CSC	This breeding migrant to California nests in only a few location types: behind or beside waterfalls, on cliffs near water, and in sea caves. Forages primarily on flying ants, sometimes at great distances from nesting locales. Winters in South America.	**Possible.** This species may forage in flight over the study area from time to time, but nesting habitat is absent from the study area and surrounding lands.

TABLE 1. LIST OF SPECIAL STATUS SPECIES THAT COULD OCCUR IN THE PROJECT VICINITY

ANIMALS (cont'd)

California Species of Special Concern

Species	Status	Habitat/Range	Occurrence on the Study Area
Pallid bat (*Antrozous pallidus*)	CSC	Found in grasslands, chaparral, and woodlands, where it feeds on ground- and vegetation-dwelling arthropods, and occasionally takes insects in flight. Prefers to roost in rock crevices, but many also use tree cavities, caves, bridges, and buildings.	**Possible.** The study area contains potential roosting habitat for the pallid bat in its buildings and mature trees. Pallid bats may forage in the site's woodlands.
Townsend's big-eared bat (*Corynorhinus townsendii*)	CSC	Forages over mesic habitats such as watercourses and riparian habitats. Roosts in the open, hanging from walls and ceilings of caves, tunnels, bridges, and sometimes buildings. Extremely sensitive to huma disturbance.	**Possible.** The study area contains potential roosting habitat for the Townsend's big-eared bat in residential outbuildings and other lightly-used structures. Individuals of this species may forage over the study area's woodlands.
Western mastiff bat (*Eumops perotis californicus*)	CSC	Forages over dry washes, flood plains, chaparral, oak woodland, open ponderosa pine forest, grassland, and agricultural areas. Roosts in crevices in cliff faces, high buildings, and tunnels.	**Possible.** The study area does not contain features likely to support roosting by the western mastiff bat, but individuals of this species may forage over the site from time to time.
Sierra marten (*Martes caurina sierrae*)	CSC	Found in high-elevation forests with dense canopy cover and large amounts of coarse woody debris on the forest floor. Individuals of this species are occasionally detected at elevations as low as 4,000 feet, but their typical elevational distribution is above 7,000 feet (CDFW 2026a, Grinnell et al. 1937).	**Absent.** The study area is well below this species' elevational range and suitable habitat is absent.

OCCURRENCE TERMINOLOGY

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

STATUS CODES

FE	Federally Endangered	CE	California Endangered
FT	Federally Threatened	CT	California Threatened
FPE	Federally Endangered (Proposed)	CFP	California Fully Protected
FPT	Federally Threatened (Proposed)	CSC	California Species of Special Concern
FC	Federal Candidate	CC	California Candidate

CRPR	California Rare Plant Ranks		
1A	Plants Presumed Extinct in California	0.1	Seriously Threatened in California
1B	Plants Rare, Threatened, or Endangered in California and elsewhere	0.2	Moderately Threatened in California
		0.3	Not Very Threatened in California
2	Plants Rare, Threatened, or Endangered in California, but more common elsewhere		

2.5 JURISDICTIONAL WATERS

In the State of California, jurisdictional waters typically refer to aquatic features subject to the regulatory authority of the USACE and/or state agencies such as the California Department of Fish and Wildlife (CDFW) and Regional Water Quality Control Board (RWQCB). However, on tribal trust lands such as the Tule River Reservation, it is typically only federal jurisdiction that applies. Federally jurisdictional waters, or Waters of the U.S., are presently defined as "relatively permanent, standing or continuously flowing bodies of water" including rivers, creeks, lakes, oceans, and wetlands that directly adjoin these features. The South Fork Tule River within the study area is presumed to be a Water of the U.S. subject to regulation by the USACE and Environmental Protection Agency (EPA) under the Clean Water Act of 1972.

2.6 DESIGNATED CRITICAL HABITAT

As will be discussed further in Section 3.0, the 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 study area and surrounding lands.

2.7 SENSITIVE NATURAL COMMUNITIES

California contains a wide range of natural communities, or unique assemblages of plants and animals. These communities have largely been classified and mapped by CDFW as part of their Vegetation Classification and Mapping Program (VegCAMP). Natural communities are assigned state and global ranks according to their rarity and the magnitude and trend of the threats they face. Any natural community with a state rank of 3 or lower (on a 1 to 5 scale) is considered "sensitive" and must be considered in CEQA review.

The study area contains well-developed riparian woodland habitat supporting a diversity of native trees and shrubs. The site's woodlands are dominated by California sycamore, and have been assigned a vegetation alliance of California sycamore-coast live oak in VegCAMP mapping

(CDFW 2026b). This alliance has a state rank of 3, meaning it is considered to be a sensitive natural community.

2.8 WILDLIFE MOVEMENT CORRIDORS

Wildlife movement corridors are routes that animals regularly and predictably follow during seasonal migration, dispersal from native ranges, daily travel within home ranges, and inter-population movements. Movement corridors in California are typically associated with valleys, ridgelines, and rivers and creeks supporting riparian vegetation. Certain features of the project area have the potential to function as movement corridors for resident and migratory fish and wildlife species.

The riparian woodland associated with the South Fork Tule River is expected to function as a regionally important wildlife movement corridor.

3.0 RELEVANT GOALS, POLICIES, AND LAWS

3.1 CALIFORNIA ENVIRONMENTAL QUALITY ACT

In California, any project carried out or approved by a public agency that will result in a direct or reasonably foreseeable indirect physical change in the environment must comply with CEQA. The purpose of CEQA is to ensure that a project's potential impacts on the environment are evaluated and methods for avoiding or reducing these impacts are considered before the project is allowed to move forward. A secondary aim of CEQA is to provide justification to the public for the approval of any projects involving significant impacts on the environment.

According to Section 15382 of the CEQA Guidelines, a significant effect on the environment means a "substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic interest." Although the lead agency may set its own CEQA significance thresholds, project impacts to biological resources are generally considered to be significant if they would meet any of the following criteria established in Appendix G of the CEQA Guidelines:

- 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 CDFW or USFWS.
- Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by CDFW or USFWS.
- 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.
- Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.
- Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

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

Furthermore, CEQA Guidelines Section 15065(a) requires the lead agency to make "mandatory findings of significance" if there is substantial evidence that a project may:

- 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, or substantially reduce the number or restrict the range of an endangered, rare or threatened species.

- Achieve short-term environmental goals to the detriment of long-term environmental goals.

- Produce environmental effects that are individually limited but cumulatively considerable, meaning that the incremental effects of the project are significant when viewed in connection with the effects of past projects, other current projects, and probable future projects.

3.2 NATIONAL ENVIRONMENTAL POLICY ACT

Projects that are proposed, funded, or authorized by federal agencies are generally subject to the provisions of NEPA. Signed into law in 1970 and amended most recently by the Fiscal Responsibility Act of 2023, NEPA requires federal agencies to evaluate the environmental effects of their proposed actions prior to making decisions. Agencies must utilize systematic, interdisciplinary approach that includes the review of technically and economically feasible alternatives to the proposed action, and must ensure professional and scientific integrity in the environmental documents they prepare.

The level of NEPA review that is required is related to a project's potential to cause "significant" environmental effects. Projects with reasonably foreseeable significant effects on the quality of the human environment require an Environmental Impact Statement (EIS). Among other elements, an EIS requires detailed analyses of the project's environmental effects, development and study of a reasonable range of alternatives to the proposed action, and consideration of public comments received during the scoping process. Projects that do not have reasonably foreseeable significant effects on the quality of the human environment, and projects for which the significance of such effects is unknown, may meet their NEPA obligations with the

preparation of an Environmental Assessment (EA). An EA is a concise public document that either provides the basis for a federal agency's finding of no significant impact or culminates in a determination that an EIS is necessary.

3.3 STATE AND FEDERAL ENDANGERED SPECIES ACTS

In California, imperiled plants and animals may be afforded special legal protections under the California Endangered Species Act (CESA) and/or Federal Endangered Species Act (FESA). Species may be listed as "threatened" or "endangered" under one or both Acts, and/or as "rare" under CESA. Under both Acts, "endangered" means a species is in danger of extinction throughout all or a significant portion of its range, and "threatened" means a species is likely to become endangered within the foreseeable future. Under CESA, "rare" means a species may become endangered if their present environment worsens. Both Acts prohibit "take" of listed species, defined under CESA as "to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture or kill" (California Fish and Game Code, Section 86), and more broadly defined under FESA to include "harm" (16 USC, Section 1532(19), 50 CFR, Section 17.3).

3.4 MIGRATORY BIRD TREATY ACT

The Migratory Bird Treaty Act (MBTA: 16 USC 703-712) prohibits killing, possessing, or trading in any bird species covered in one of four international conventions to which the United States is a party, except in accordance with regulations prescribed by the Secretary of the Interior. The name of the act is misleading, as it actually covers almost all birds native to the United States, even those that are non-migratory. The MBTA encompasses whole birds, parts of birds, and bird nests and eggs.

3.5 HABITAT CONSERVATION PLANS AND NATURAL COMMUNITY CONSERVATION PLANS

Section 10 of the federal Endangered Species Act establishes a process by which non-federal projects can obtain authorization to incidentally take listed species, provided take is minimized and thoroughly mitigated. A Habitat Conservation Plan (HCP), developed by the project applicant in collaboration with the USFWS and/or NMFS, ensures that such minimization and

mitigation will occur, and is a prerequisite to the issuance of a federal incidental take permit. Similarly, a Natural Community Conservation Plan (NCCP), developed by the project applicant in collaboration with CDFW, provides for the conservation of biodiversity within a project area, and permits limited incidental take of state-listed species.

3.6 CLEAN WATER ACT

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)). The CWA does not supply a definition for waters of the U.S., and that has been the subject of considerable debate since the CWA's passage in 1972. A variety of regulatory definitions have been promulgated by the two federal agencies responsible for implementing the CWA, the Environmental Protection Agency (EPA) and USACE. These definitions have been interpreted, and in some cases, invalidated, by federal courts.

Waters of the U.S. are presently defined by the EPA and USACE's joint 2023 Revised Definition of 'Waters of the U.S.' Rule (2023 WOTUS Rule), issued in January 2023 and amended in August 2023. Generally speaking, waters of the U.S. include:

- Waters which are currently used, or were used in the past, or may be susceptible to use in interstate or foreign commerce, including all waters which are subject to the ebb and flow of the tide
- The territorial seas
- Interstate waters
- Impoundments of waters otherwise defined as waters of the United States
- Tributaries to other waters of the U.S. that are relatively permanent, standing or continuously flowing bodies of water
- Wetlands adjacent to other waters of the U.S. that have a continuous surface connection to those waters

The 2023 WOTUS Rule also defines a number of exclusions from the definition of waters of the U.S., many of which are longstanding exclusions from earlier regulatory regimes. These generally include:

- Waste treatment systems
- Prior converted cropland
- Ditches excavated wholly in and draining only dry land that do not carry a relatively permanent flow of water
- Certain artificial features, e.g. irrigation basins, swimming pools, borrow pits, and artificially irrigated areas
- Swales and erosional features characterized by low volume, infrequent, or short duration flow

Projects that will discharge dredge or fill material into waters of the U.S. must obtain Section 404 permit coverage from the USACE. Small-scale projects are often able to obtain coverage under one or more Nationwide Permits, while large-scale projects generally need to obtain Individual Permits. Section 404 permits typically require mitigation to ensure that there will be no net loss of wetland functions or values.

Projects that discharge pollutants into waters of the U.S., either from a localized “point source” or more general “nonpoint source,” must obtain a NPDES permit. On tribal lands, unless the Tribe has obtained “treated in a similar manner as a state” (TAS) status, the NPDES program and any associated permitting is administered by the EPA. NPDES permits cover a wide range of scenarios, from large-scale industrial or wastewater discharges to small-scale stormwater discharges from construction sites. Stormwater permit coverage is required for any project that will disturb one acre or more of land through earth-disturbing activities such as clearing, grading, excavating, and stockpiling. Most such projects can obtain blanket coverage under the EPA’s Construction General Permit (CGP).

Any federal permit or license for discharges into waters of the U.S. must be accompanied by a Section 401 Water Quality Certification (WQC) certifying that the project will comply with applicable water quality standards. For Tribes without TAS status, the EPA once again functions as the permitting authority. Where Tribes have adopted their own EPA-approved water quality



standards, the EPA applies those tribal standards to the WQC. Where Tribes do not have their own water quality standards, and where the affected waterbody flows into the adjacent state, the EPA typically applies that state's water quality standards to the WQC.

4.0 IMPACTS AND MITIGATIONS

This impact assessment assumes that a relatively small portion of the study area will be physically disturbed by the proposed project. Based on concept-level design, it appears that several disjunct areas will be affected, with a collective extent of up to 7 acres. Project impacts will be concentrated in developed areas of the Village Center. The river corridor will be affected only at the proposed locations of the two pedestrian bridges. It is conservatively assumed that up to 2 acres of combined riparian/aquatic habitat will be impacted from bridge construction, and that most of these impacts will be temporary. Some riparian tree and shrub removal will be necessary to accommodate bridge construction.

4.1 POTENTIALLY SIGNIFICANT PROJECT IMPACTS

4.1.1 Potential Project Impacts to Special Status Plant Species

Potential Impacts. Of the 24 regionally occurring special status plant species, three have some potential to occur in the study area. These are the rose-flowered larkspur (*Delphinium purpusii*), calico monkeyflower (*Diplacus pictus*) and Munz's iris (*Iris munzii*). Their potential occurrence on site is limited to the woodlands of the site's river corridor (see Figure 3). Two project components are proposed for this area: replacement of an existing pedestrian bridge and construction of a new pedestrian bridge. If individuals or populations of these species are found in the work areas for bridge construction, they may be damaged or destroyed by construction activities. This is considered a potentially significant impact of the project.

The remaining 21 regionally-occurring special status plant species have no appreciable potential to occur on site due to the absence of suitable habitat or soils, the site's being located outside of the species' distributions, or a combination thereof. Project impacts are less than significant for the 21 regionally-occurring plant species that are not expected to occur on site.

Mitigation. The following measures will be implemented to reduce the magnitude of potential project-related impacts to the rose-flowered larkspur, calico monkeyflower, and Munz's iris:

> ***Measure 4.1.1a (Protocol-level Surveys).*** Prior to the start of bridge construction, or any other project activity in the river corridor, protocol-level rare plant surveys will be

conducted within the associated work areas. The surveys will be conducted when local populations of the target species are in bloom, as determined through visits to reference populations and/or consultation with local botanists. The general blooming windows are April-May for the rose-flowered larkspur, March-May for the calico monkeyflower, and March-April for the Munz's iris.

Measure 4.1.1b (Avoidance). Any individuals or populations of the rose-flowered larkspur, calico monkeyflower, or Munz's iris found during the surveys will be avoided by project activities to the maximum extent feasible. A qualified biologist will identify an appropriate construction-free zone around populations to be avoided. Construction-free zones will be delineated on the ground with temporary construction fencing and maintained for the duration of project activities.

Mitigation Measure 4.1.1c (Salvage and Relocation). If it is not feasible to avoid some or all of any rose-flowered larkspur, calico monkeyflower, or Munz's iris individuals or populations found on site, those plants that cannot be avoided will be salvaged and relocated to alternative habitat by a qualified botanist following the provisions of a salvage, relocation, and monitoring plan. Alternative habitat must be in an area protected from herbicide application, excessive grazing, and other deleterious impacts.

Implementation of the above measures will reduce impacts to the rose-flowered larkspur, calico monkeyflower, and Munz's iris to a less-than-significant level.

4.1.2 Potential Project Impacts to the Monarch Butterfly

Potential Impacts. The monarch butterfly has the potential to forage, roost, and possibly breed along the study area's river corridor and in undeveloped portions of its rural residential properties. Two project components are proposed for such areas: replacement of an existing pedestrian bridge and construction of a new pedestrian bridge. All other project activities will take place in the Village Center, where monarchs have little potential to occur and no project-related impacts to this species are anticipated.

The potential for direct effects to monarchs is greatest during the spring and summer, when monarchs may breed in the project vicinity. Monarch eggs, larvae, and pupae would be particularly vulnerable to construction-related mortality, as these life stages are relatively immobile and unable to leave their milkweed host plants. Monarch adults are volant and would presumably have some ability to avoid construction disturbance while foraging or roosting on site.

The project may also indirectly affect monarchs through any construction-related loss of milkweed habitat that occurs. Loss of milkweed habitat has been cited as a major factor in monarch population declines (USFWS 2020). While project-related removal of milkweed plants would be minor, if it occurs at all, it would incrementally contribute to a habitat trend that is substantially affecting this species, and potential impacts associated with milkweed loss are therefore considered significant.

The project is not expected to adversely affect monarchs through loss of other plants that could be used for foraging by this species, or by loss of trees. Project-related vegetation removal will be localized and small-scale, and considerable alternative foraging and roosting habitat will remain available to monarchs following project implementation, both on- and off-site.

Mitigation. The following measures will be implemented to reduce the magnitude of potential project impacts to the monarch butterfly.

> ***Mitigation Measure 4.1.2a (Milkweed Survey).*** Prior to the start of bridge construction, a qualified biologist will survey the associated work areas for milkweed plants. The survey will be conducted at a time of year when milkweed is readily identifiable. The objective of the survey will be to tally and map all milkweed plants that could potentially be impacted by project activities.
>
> ***Mitigation Measure 4.1.2b (Construction Timing).*** If feasible, no milkweed plants will be removed during the period when monarchs are most likely to breed in the project vicinity, March to August.
>
> ***Mitigation Measure 4.1.2c (Compensatory Mitigation).*** Any milkweed plants that are removed by the project will be replaced at a 3:1 ratio in accordance with a revegetation plan prepared by a qualified biologist. The planting site(s) must be in similar or higher quality habitat to the habitat that was impacted, in area(s) that will not be mowed or treated with pesticides or herbicides.

Implementation of the above measures will reduce impacts to the monarch butterfly to a less-than-significant level.

4.1.3 Potential Project Impacts to the Crotch's Bumble Bee

Potential Impacts. The Crotch's bumble bee has the potential to forage, nest, and overwinter along the study area's river corridor and in undeveloped portions of its rural residential properties. Two project components are proposed for such areas: replacement of an existing

pedestrian bridge and construction of a new pedestrian bridge. All other project activities will take place in the Village Center, where habitat is absent and no impacts to the Crotch's bumble bee are anticipated.

If Crotch's bumble bees are present at the time of bridge construction, individual bees may be vulnerable to construction-related injury or mortality. This is of particular concern during nesting, as destruction of a single nest may result in the mortality of numerous adults and larvae. Construction-related destruction of Crotch's bumble bee nests would be considered a significant impact of the project.

The Crotch's bumble bee is not expected to be adversely affected by project-related loss of habitat. Habitat impacts associated with bridge construction will be localized and small-scale. Extensive habitat for this species will remain available elsewhere along the South Fork Tule River and on adjoining lands. Loss of habitat for the Crotch's bumble bee is not considered to be a significant impact of the project.

Mitigation. The following measures will be implemented to reduce the magnitude of potential project-related impacts to the Crotch's bumble bee:

> ***Mitigation Measure 4.1.3a (Construction Timing).*** If feasible, all bridge construction activities will take place between October and February, outside of the period in which Crotch's bumble bee nests are typically active.
>
> ***Mitigation Measure 4.1.3b (Preconstruction Surveys).*** If bridge construction must occur between March and September, then a qualified biologist will conduct preconstruction surveys for the Crotch's bumble bee within the associated work areas. To maximize detection, the surveys will be conducted on warm, sunny days (65-90 degrees F) when there is low wind (less than 8 mph).
>
> The surveys will be conducted by walking meandering transects through the work areas, while visually searching for bumble bees and potential nest sites. Any bumble bees that are observed will be followed and, if possible, photographed once they alight on a plant, highlighting the following features to aid identification:
>
> - Face, including cheek length
> - Top of the head
> - Banding on the abdomen
> - Color pattern on the thorax

At any burrows or other underground features that exhibit concentrated bumble bee activity, the surveyor will monitor activity to determine nesting status.

***Mitigation Measure 4.1.3c (Avoidance*).** Any suspected Crotch's bumble bee nests that are discovered during the surveys will be avoided by an appropriate setback during bridge construction activities, until the biologist determines the nest is no longer active.

Implementation of the above measures will reduce impacts to the Crotch's bumble bee to a less-than-significant level.

4.1.4 Potential Project Impacts to the Western Pond Turtle

Potential Impacts. Two project components are proposed in areas where western pond turtles may occur: replacement of an existing pedestrian bridge and construction of a new pedestrian bridge at locations along the South Fork Tule River. Turtles may be found in the river at these locations and may bask or overwinter in adjoining terrestrial habitats. Both locations are characterized by woodland habitat with high levels of canopy closure unconducive to nesting by this species.

If turtles are present at the time of bridge construction, individuals could be injured or killed by construction activities. This is considered to be a potentially significant impact of the project. All other project activities will take place in the Village Center, where habitat is absent and no impacts to the western pond turtle are anticipated.

The western pond turtle is not expected to be adversely affected by project-related loss of habitat. Habitat impacts associated with bridge construction will be localized and small-scale. Extensive habitat for this species will remain available elsewhere along the South Fork Tule River following project implementation. Loss of habitat for the western pond turtle is not considered to be a significant impact of the project.

Mitigation. The following measures would be implemented for the protection of western pond turtles:

***Mitigation Measure 4.1.4a* (*Preconstruction Surveys*).** Within 24 hours prior to the start of bridge construction at each location, a qualified biologist will conduct a preconstruction survey for western pond turtles in the associated work area.

***Mitigation Measure 4.1.4b* (*Relocation*).** The biologist will capture and relocate any turtles found within the work areas during the surveys. Turtles will be relocated to suitable alternative habitat within the river corridor, well outside of work area boundaries.

Mitigation Measure 4.1.4c (Employee Education Program). Prior to the start of bridge construction, workers will receive training on western pond turtle identification and life history and the project-specific measures required for this species' protection.

***Mitigation Measure 4.1.4d (Site Inspections and Turtle Avoidance/Relocation*).** During bridge construction, construction staff will regularly inspect the work area for western pond turtles. At a minimum, this will include (1) checking for turtles under and around any parked vehicles or equipment prior to their operation, (2) scanning the ground for turtles while operating vehicles or equipment, and (3) checking any open trenches or other excavations for trapped turtles at the beginning and end of each work day.

Mitigation Measure 4.1.4e (Avoidance). If any turtles are observed on site while work is occurring, work in the immediate area will cease and turtles will be allowed to leave the construction zone of their own volition, if feasible. If necessary, a qualified biologist will capture and relocate such turtles as described above under Mitigation Measure 4.1.4b.

Implementation of the above measures will reduce potential project-related impacts to the western pond turtle to a less-than-significant level.

4.1.5 Potential Project Impacts to the Northern California Legless Lizard

Potential Impacts. The northern California legless lizard has the potential to occur in the terrestrial habitats of the study area's river corridor. Two project components are proposed for such areas: replacement of an existing pedestrian bridge and construction of a new pedestrian bridge. If legless lizards are present at the time of these construction activities, individuals could be injured or killed. This is considered to be a potentially significant impact of the project. All other project activities will take place in the Village Center, where habitat is absent and no impacts to legless lizards are anticipated.

The northern California legless lizard is not expected to be adversely affected by project-related loss of habitat. Habitat impacts associated with bridge construction will be localized and small-scale. Extensive habitat for this species will remain available elsewhere along the South Fork Tule River following project implementation. Loss of habitat for the northern California legless lizard is not considered to be a significant impact of the project.

Mitigation. The following measures would be implemented for the protection of the northern California legless lizard:

> ***Mitigation Measure 4.1.5a* (*Preconstruction Surveys*).** Within 24 hours prior to the start of bridge construction at each location, a qualified biologist will conduct a preconstruction survey for northern California legless lizard in the associated work area. The survey will entail visually searching all terrestrial habitats of the work areas and will include gently raking leaf litter and turning over rocks, logs, and other features that could serve as refugia for individuals of this species.
>
> ***Mitigation Measure 4.1.5b* (*Relocation*).** The biologist will capture and relocate any legless lizards found within the work areas during the surveys. Lizards will be relocated to suitable alternative habitat within the river corridor, outside of work area boundaries.

Implementation of the above measures will reduce potential project-related impacts to the northern California legless lizard to a less-than-significant level.

4.1.6 Potential Project Impacts to Nesting Birds and Raptors

Potential Impacts. The study area may be used for nesting by numerous birds and raptors protected by the Migratory Bird Treaty Act. If project construction takes place during the nesting season, birds nesting in active work areas could be injured or killed by construction activities or disturbed to a degree that their reproductive success could be compromised. Construction-related nest disturbance is also a possibility for nests located outside of work areas, but within visual or auditory range of construction activities. Construction-related mortality/disturbance of nesting birds and raptors is a potentially significant impact of the project.

Mitigation. To avoid and minimize the potential for construction-related mortality/disturbance of nesting birds and raptors, the following measures will be implemented:

> ***Measure 4.1.6a (Construction Timing).*** If feasible, the project will be constructed between September 1 and January 31, outside of the avian nesting season.
>
> ***Measure 4.1.6b (Preconstruction Surveys*).** If construction is to occur between February 1 and August 31, a qualified biologist will conduct pre-construction surveys for active bird nests within 10 days prior to the start of any work within this period. The survey area will encompass the work area(s) and surrounding lands within 500 feet for nesting raptors and 250 feet for other nesting birds.

***Measure 4.1.6c (Avoidance of Active Nests*).** Should any active nests be discovered in or near proposed construction zones, the biologist will identify a suitable construction-free buffer around the nest. The buffer distance will be determined based on species biology, site-specific conditions, and the level of project-related disturbance that is anticipated near the nest(s) in question. Buffers will be identified on the ground with flagging or fencing and will be maintained until the biologist has determined that the young have fledged and are capable of foraging independently.

Implementation of the above measures will reduce project impacts to nesting birds and raptors to a less-than-significant level and facilitate compliance with the Migratory Bird Treaty Act.

4.1.7 Potential Project Impacts to Tree-roosting Bats including Pallid Bat

Potential Impacts. The study area's buildings and mature trees have the potential to support roosting by various bat species. The project will not remove or otherwise impact buildings, and no project-related impacts to any bats roosting in the site's buildings are expected. Some amount of tree removal will likely be needed to accommodate the proposed pedestrian bridge replacement and construction activities in the river corridor, introducing the potential for construction-related injury or mortality to tree-roosting bats, possibly including the pallid bat (*Antrozous pallidus*), a California Species of Special Concern. Construction-related injury or mortality of the pallid bat and other tree-roosting bats is a potentially significant impact of the project.

The pallid bat is not expected to be adversely affected by project-related loss of habitat. Although a few potential roost trees may be removed, numerous similar trees will remain available elsewhere along the river corridor, both on-site and off-site. The study area's foraging value for this species will remain virtually unchanged. Any pallid bats that presently forage on site would be expected to continue to do so following project development. Loss of habitat for the pallid bat is not considered to be a significant impact of the project.

Mitigation. The following measures will be implemented for the protection of tree-roosting bats including the pallid bat.

***Mitigation 4.1.7a* (*Construction Timing*).** If feasible, project-related tree removal will occur outside of the period between April 15 and September 30. This is the time frame within which colony-roosting bats in the vicinity generally assemble, give birth, nurse their young, and ultimately disperse.

***Mitigation 4.1.7b* (*Pre-construction Surveys*).** Within 10 days prior to the removal of any mature trees, a qualified biologist will survey these features for roosting bats. The biologist will look for individuals, guano, and staining, and will listen for bat vocalizations. If necessary, the biologist will wait for nighttime emergence of bats from roost sites.

***Mitigation 4.1.7c* (*Avoidance of Maternity Roosts*).** Should any active maternity bat roosts be discovered, the biologist will identify a suitable construction-free buffer around the roost(s). The buffer will be identified on the ground with flagging or fencing, and will be maintained until the biologist has determined that the nursery is no longer active.

***Mitigation 4.1.7d* (*Humane Eviction of Non-breeding Bats*).** If a non-breeding bat colony is found, the individuals will be humanely evicted, under the direction of a qualified biologist, to ensure that bats are not physically harmed by tree removal.

Implementation of the above measures will reduce potential construction-related impacts to roosting bats including the pallid bat to a less-than-significant level.

4.1.8 Potential Project Impacts to Sensitive Natural Communities

Potential Impacts. As discussed, the study area contains a vegetation alliance classified by the VegCAMP system as a sensitive natural community, California sycamore-coast live oak (CDFW 2026b). Broadly, this community corresponds to the river corridor habitat type identified in this report (see Figure 3). Two project components are proposed for the river corridor: replacement of an existing pedestrian bridge and construction of a new pedestrian bridge. These project components may temporarily disturb an area of up to 2 acres, with permanent impacts limited to the bridges themselves. Some amount of riparian tree and shrub removal will be needed to accommodate bridge construction. Loss of riparian trees and shrubs, even if minor, will contribute to degradation of a sensitive natural community and is considered a potentially significant impact of the project.

Mitigation. The following measures will be implemented to mitigate any impacts to riparian trees and shrubs.

Mitigation Measure 4.1.8a (Tree Survey). Prior to project construction, a qualified biologist will survey all portions of the river corridor that are proposed for direct impact. All trees and shrubs within these areas will be identified to species and mapped, and their diameter at breast height (DBH) will be recorded. At the end of construction, a qualified biologist will repeat the survey to quantify the tree and shrub removal that occurred.

Mitigation Measure 4.1.8b (Replacement Plantings). Replacement plantings will be provided as compensation for removal of any riparian trees or shrubs with a DBH of 4 inches or greater. Plantings will be installed at a ratio of 3:1 for impacted trees/shrubs with a DBH between 4 and 24 inches, and at a ratio of 10:1 for impacted trees with a DBH greater than 24 inches. All plantings will be monitored annually for a minimum of five years. A revegetation plan will be prepared for the project that will detail the methods for planting, irrigating, and maintaining the replacement trees and shrubs.

Implementation of these measures will reduce potential project impacts to sensitive natural communities to a less-than-significant level.

4.2 LESS THAN SIGNIFICANT PROJECT IMPACTS

4.2.1 Project Impacts to Special Status Animal Species that Would Use Work Areas for Foraging Only

Potential Impacts. Of the 18 special status animal species potentially occurring in the regional vicinity, three may forage in or over areas planned for project-related disturbance, but would not utilize these areas for sensitive activities such as breeding or communally roosting (see Table 2). These species are the black swift (*Cypseloides niger*), Townsend's big-eared bat (*Corynorhinus townsendii*), and western mastiff bat (*Eumops perotis californicus*). All three species forage on the wing and are highly mobile during this activity, such that they would not be at risk of construction-related injury or mortality. Note that while the Townsend's big-eared bat has some potential to roost in lightly-used buildings of the study area, no buildings are proposed for impact under current project design; therefore, no impacts to roosting Townsend's big-eared bats are anticipated.

The project would not adversely affect any of these species through loss of habitat. The study area's foraging value for aerial foragers would remain virtually unchanged. Any individuals of these species that presently forage on site would be expected to continue to do so following project development. Loss of habitat for the black swift, Townsend's big-eared bat, and western mastiff bat is not considered to be a significant impact of the project.

Mitigation. Mitigation is not warranted.

4.2.2 Project Impacts to Special Status Animal Species Absent from, or Unlikely to Occur within, the Study area

Potential Impacts. Of the 18 special status animal species that potentially occur in the general vicinity of the site, ten are considered absent or unlikely to occur within the study area due to the absence of suitable habitat and/or the study area's being situated outside of the species' known distribution (see Table 2). These are the valley elderberry longhorn beetle (*Desmocerus californicus dimorphus*), western spadefoot (*Spea hammondii*), foothill yellow-legged frog (*Rana boylii*), Southern mountain yellow-legged frog (*Rana muscosa*), California condor (*Gymnogyps californianus*), tricolored blackbird (*Agelaius tricolor*), wolverine (*Gulo gulo*), fisher (*Pekania pennanti*), San Joaquin kit fox (*Vulpes macrotis muitca*), and Sierra marten (*Martes caurina sierrae*). Because these species have no appreciable potential to occur on site, they are not expected to be affected by the project, directly or indirectly. Project impacts to these species are not considered to be significant.

Mitigation. Mitigation is not warranted.

4.2.3 Project Impacts to Waters of the U.S.

Potential Impacts. As discussed, the project includes improvements related to two pedestrian bridges over the South Fork Tule River. One of the bridges is currently existing but experienced damage during past flooding and will be replaced under the project. The other bridge is newly proposed and will interconnect Cow Mountain Road with the pedestrian corridor to the Justice Center. It is unknown, at present, whether either bridge will require the placement of structures or materials below the river's ordinary high water mark, which represents the typical extent of USACE jurisdiction. Any impacts that do occur within the jurisdictional area of the river would be extremely small-scale and are not expected to affect the function and value of this aquatic resource. Project impacts to waters of the U.S. are not considered to be significant. However, depending on bridge design, permits from the USACE and EPA may be required.

Mitigation. Mitigation is not warranted.

4.2.4 Project Impacts to Designated Critical Habitat

Potential Impacts. The project does not contain or adjoin designated critical habitat. There will be no impact to such habitat.

Mitigation. Mitigation measures are not warranted.

4.2.5 Project Impacts to Wildlife Movement Corridors

Potential Impacts. The reach of the South Fork Tule River passing through the study area is likely to function as a regionally important wildlife movement corridor. As discussed, two project components are proposed within the river corridor: replacement of an existing pedestrian bridge and construction of a new pedestrian bridge. While bridge construction is occurring, there will be an elevated level of disturbance at these two locations, which may cause terrestrial wildlife to shift their movements away from the work areas. Following construction, disturbance levels at these locations will drop, but will remain somewhat above baseline due to the introduction of intermittent pedestrian traffic across the river corridor. The river corridor is 250 to 350 feet wide at the proposed bridge sites and contains substantial hiding cover, with opportunities for movement on either side of the channel. Although terrestrial wildlife moving along the river corridor may experience new anthropogenic disturbance as a result of bridge development, the project is not expected to significantly interfere with wildlife use of this corridor. Project impacts to wildlife movement corridors are not consider to be significant.

Mitigation. Mitigation is not warranted.

4.2.6 Local Policies and Ordinances, Habitat Conservation Plans, and Natural Community Conservation Plans

Potential Impacts. It is assumed that the project will be implemented in a manner consistent with any Tribal policies or ordinances that pertain to biological resources. No HCPs or NCCPs are in effect for the study area.

Mitigation. No mitigation is required.

5.0 LITERATURE REFERENCED

Baldwin, B.G., D.H. Goldman, D.J. Keil, R. Patterson, T.J. Rosatti, and D. G. Wilken, editors. 2012. The Jepson Manual: Vascular Plants of California, second edition. University of California Press, Berkeley.

Baumberger, K. L., M. V. Eitzel, M. E. Kirby, and M. H. Horn. 2019. Movement and habitat selection of the western spadefoot (*Spea hammondii*) in southern California. PLoS ONE 14(10): e0222532. Available at: https://doi.org/10.1371/journal.pone.0222532

Calflora. 2026. Calflora: An online database of plant identification and distribution [web application]. Calflora, Berkeley, California. Available: http://www.calflora.org.

California Department of Fish and Wildlife (CDFW). 2026a. California Natural Diversity Database. The Resources Agency, Sacramento, CA.

_____. 2026b. Vegetation – Southern Sierra Nevada Foothills [ds3073]. Vegetation Classification and Mapping Program. CDFW Open Data Portal. Available: https://data-cdfw.opendata.arcgis.com/datasets/d24b3f8c12314a9fb483909a1dede492_0/explore?location=36.143145%2C-119.215351%2C8

California Native Plant Society. 2026. Inventory of Rare and Endangered Vascular Plants of California. Available online at: http://cnps.site.aplus.net/cgi-bin/inv/inventory.cgi.

California Soil Resource Lab. 2008. Streaming, seamless interface to USDA-NCSS SSURGO and STATSGO Soil Survey Products.

eBird. 2026. eBird: An online database of bird distribution and abundance [web application]. eBird, Cornell Lab of Ornithology, Ithaca, New York. Available: http://www.ebird.org.

iNaturalist. 2026. Available: https://www.inaturalist.org/

Natural Resources Conservation Service (NRCS). 2026. National Hydric Soils List by State, California. U.S. Department of Agriculture. Available: https://www.nrcs.usda.gov/publications/query-by-state.html

NOAA National Centers for Environmental Information. 2021. U.S. Climate Normals 2020: U.S. Annual Climate Normals (1991-2020). Available at: https://www.ncei.noaa.gov/access/us-climate-normals/#dataset=normals-annualseasonal&timeframe=30&station=US1CATL0017

The Xerces Society. 2019. A Quick Guide to Monarch Habitat on Farms in California's Central Valley. Publication 19-033_01.

U.S. Fish and Wildlife Service (USFWS). 2026. IPaC Resource List, Information for Planning and Consultation (IPaC). Available: https://ecos.fws.gov/ipac.

_____. 2024. Annual Population Status as of December 31, 2024. California Condor Recovery Program, Hopper Mountain National Wildlife Refuge Complex, Ventura, CA.

Wetland Training Institute, Inc. 1991. Federal Wetland Regulation Reference Manual. B.N. Goode and R.J. Pierce (eds.) WTI 90-1. 281pp.

Zeiner, David C., William F. Laudenslayer, Kenneth E. Mayer and Marshal White. Ed. 1988. California's wildlife, volume I, amphibians and reptiles, volume II, birds, and volume III, mammals. Department of Fish and Game. Sacramento, CA. Online: http://www.dfg.ca.gov/biogeodata/cwhr/cawildlife.aspx

APPENDIX A: VASCULAR PLANTS OF THE STUDY AREA

APPENDIX A: VASCULAR PLANTS OF THE STUDY AREA

The plant species listed below were observed on the study area during surveys conducted by Live Oak Associates, Inc. on February 2, 2026. The wetland indicator status of each plant, derived from the USACE-administered National Wetland Plant List for the Arid West Region, has been shown following its common name if available.

OBL - Obligate
FACW - Facultative Wetland
FAC - Facultative
FACU - Facultative Upland
UPL - Upland

ARECACEAE – Palm Family		
Washingtonia robusta	Mexican Fan Palm	FACW
ANACARDIACEAE – Sumac Family		
Toxicodendron diversilobum	Poison Oak	FACU
APOCYNACEAE – Dogbane Family		
Nerium oleander	Oleander	UPL
ASPARAGACEAE – Asparagus Family		
Agave sp.	Agave	UPL
Dipterostemon capitatus	Blue Dicks	FACU
ASTERACEAE - Sunflower Family		
Agnorhiza elata	Hall's Mule's Ears	FAC
Artemisia douglasiana	California Mugwort	FAC
Baccharis salicifolia	Mule Fat	FAC
Senecio vulgaris	Groundsel	FACU
Silybum marianum	Milk thistle	UPL
Xanthium strumarium	Rough Cocklebur	FAC
BORAGINACEAE – Borage Family		
Amsinckia sp.	Fiddleneck	FACU
BRASSICACEAE – Mustard Family		
Capsella bursa-pastoris	Shepherd's Purse	FACU
BUXACEAE - Box Family		
Buxus sp.	Boxwood	UPL
CACTACEAE - Cactus Family		
Opuntia sp.	Prickly Pear	UPL
CAPRIFOLIACEAE - Honeysuckle Family		
Lonicera hispidula	Pink Honeysuckle	FACU
CARYPHYLLACEAE – Carnation Family		
Claytonia perfoliata	Miner's Lettuce	FAC
Stellaria media	Chickweed	FACU
Tamarix sp.	Tamarisk	FAC
CUCURBITACEAE – Cucumber Family		
Marah horridus	Sierra Man-root	

CUPRESSACEAE – Cypress Family		
Sequoia sempervirens	California Redwood	UPL
CYPERACEAE – Sedge Family		
Cyperus eragrostis	Tall Flat-sedge	FACW
EUPHORBIACEAE - Spurge Family		
Ricinus communis	Castor Bean	FACU
FABACEAE - Legume Family		
Cercis occidentalis	California Redbud	UPL
Retama sphaerocarpa	Yellow Bridal Broom	
FAGACEAE - Oak Family		
Quercus douglasii	Blue oak	UPL
Quercus wislizeni	Interior Live Oak	UPL
GERANIACEAE – Geranium Family		
Erodium botrys	Big Stork Bill	FACU
GROSSULARIACEAE – Gooseberry Family		
Ribes quercetorum	Foothill Gooseberry	UPL
HYDROPHYLLACEAE – Waterleaf Family		
Phacelia tanacetifolia	Lacy Phacelia	UPL
Pholistoma auritum	Fiesta Flower	UPL
JUGLANDACEAE – Walnut Family		
Juglans hindsii	Northern California Walnut	FAC
LAMIACEAE – Mint Family		
Lavendula sp.	Lavender	UPL
Stachys albens	Cobwebby Hedgenettle	OBL
LAURACEAE – Laurel Family		
Umbellularia californica	California Bay Laurel	FAC
MALVACEAE – Mallow Family		
Malva parviflora	Cheeseweed	UPL
MORACEAE – Fig Family		
Morus alba	White Mulberry	FACU
MRYTACEAE – Myrtle Family		
Eucalyptus camaldulensis	Red Gum Eucalyptus	FAC
Eucalyptus globulus	Blue Gum Eucalyptus	
OLEACEAE – Olive Family		
Fraxinus dipetala	California Ash	UPL
Fraxinus latifolia	Oregon Ash	FACW
OROBANCHACEAE – Broomrape Family		
Castilleja sp.	Owl Clover	
PINACEAE – Pine Family		
Pinus halepensis	Aleppo Pine	UPL
Pinus sabiniana	Foothill Pine	UPL
Pinus sp.	Ornamental Pine	UPL
PLANTACEAE – Plane Family		
Platanus racemosa	Western Sycamore	FAC
POACEAE – Grass Family		
Avena sp.	Wild Oats	UPL

Echinochloa crus-galli	Barnyard Grass	FACW
Hordeum marinum	Mediterranean Barley	FAC
Lolium multiflorum	Italian Ryegrass	FAC
Poa annua	Lawn Bluegrass	FAC
Sorghum halepense	Johnson Grass	FACU
POLYGANACEAE – Buckwheat Family		
Rumex crispus	Curly Dock	FAC
RHAMNACEAE – Buckthorn Family		
Ceanothus sp.	Lilac	
Frangula rubra	Sierra Coffeeberry	FAC
ROSACEAE – Rose Family		
Rubus ursinus	California Blackberry	FAC
RUBIACEAE – Bedstraw Family		
Galium aparine	Catchweed Bedstraw	FACU
RUTACEAE – Citrus Family		
Citrus x limon	Lemon	UPL
Citrus x sinensis	Orange	UPL
SALICACEAE – Willow Family		
Salix exigua	Narrowleaf Willow	FACW
Salix laevigata	Red Willow	FACW
SAPINDACEAE – Soap Berry Family		
Acer glabrum	Mountain Maple	FAC
Acer macrophyllum	Bigleaf Maple	FAC
URTICACEAE – Nettle Family		
Urtica dioica	Stinging Nettle	FAC
VITACEAE – Grape Family		
Vitis californica	California Wild Grape	FACU

APPENDIX B: TERRESTRIAL WILDLIFE THAT POTENTIALLY OCCUR IN THE STUDY AREA

APPENDIX B: TERRESTRIAL VERTEBRATE SPECIES THAT POTENTIALLY OCCUR IN THE STUDY AREA

The species listed below are those that may be expected to routinely and predictably use or pass through the study area during some or all of the year. An asterisk denotes a species observed on or immediately adjacent to the site during surveys conducted by LOA on February 2, 2026.

CLASS: AMPHIBIA
ORDER: CAUDATA (Salamanders)
FAMILY: PLETHODONTIDAE (Lungless Salamanders)
Ensatina (*Ensatina eschscholtzii*)
ORDER: ANURA (Frogs and Toads)
FAMILY: BUFONIDAE (True Toads)
Western Toad (*Bufo boreas*)
FAMILY: HYLIDAE (Treefrogs and Relatives)
Sierran Treefrog (*Pseudacris sierra*)

CLASS: REPTILIA
ORDER: TESTUDINES (Turtles)
FAMILY: EMYDIDAE (Box and Water Turtles)
Western Pond Turtle (*Actinemys marmorata*)
ORDER: SQUAMATA (Lizards and Snakes)
SUBORDER: SAURIA (Lizards)
FAMILY: IGUANIDAE (Iguanids)
Western Fence Lizard (*Sceloporus occidentalis*)
FAMILY: SCINCIDAE (Skinks)
Gilbert Skink (*Eumeces gilberti*)
FAMILY: ANGUIDAE (Alligator Lizards and Relatives)
Southern Alligator Lizard (*Gerrhonotus multicarinatus*)
SUBORDER: SERPENTES (Snakes)
FAMILY: BOIDAE (Boas)
Rubber Boa (*Charina bottae*)
FAMILY: COLUBRIDAE (Colubrids)
Ring-necked Snake (*Diadophis punctatus*)
Racer (*Coluber constrictor*)
Striped Racer (*Masticophis flagellum*)
Gopher Snake (*Pituophis melanoleucus*)
Common Kingsnake (*Lampropeltis getulus*)
Sierra Gartersnake (*Thamnophis couchii*)
Mountain Gartersnake (*Thamnophis elegans elegans*)
Common Gartersnake (*Thamnophis sirtalis*)
Night Snake (*Hypsiglena torquata*)
FAMILY: VIPERIDAE
Western Rattlesnake (*Crotalus viridis*)

CLASS: AVES

ORDER: ANSERIFORMES (Ducks, Geese, and Swans)

FAMILY: ANATIDAE (Ducks, Geese, and Swans)

Canada Goose (*Branta Canadensis*)
*Mallard (*Anas platyrhynchos*)
Wood Duck (*Aix sponsa*)
Bufflehead (*Bucephala albeola*)
Ring-necked Duck (*Aythya collaris*)
Common Merganser (*Mergus merganser*)
Hooded Merganser (*Lophodytes cucullatus*)

ORDER: CICONIIFORMES (Herons, Storks, Ibises, and relatives)

FAMILY: ARDEIDAE (Herons and Bitterns)

Great Blue Heron (*Ardea herodias*)

ORDER: FALCONIFORMES (Vultures, Hawks, and Falcons)

FAMILY: CATHARTIDAE (American Vultures)

*Turkey Vulture (*Cathartes aura*)

FAMILY: ACCIPITRIDAE (Hawks, Old World Vultures, and Harriers)

Sharp-shinned Hawk (*Accipiter striatus*)
Cooper's Hawk (*Accipiter cooperi*)
Red-shouldered Hawk (*Buteo lineatus*)
*Red-tailed Hawk (*Buteo jamaicensis*)
Ferruginous Hawk (*Buteo regalis*)

FAMILY: FALCONIDAE (Caracaras and Falcons)

*American Kestrel (*Falco sparverius*)
Merlin (*Falco columbarius*)
Prairie Falcon (*Falco mexicanus*)

ORDER: GALLIFORMES (Megapodes, Currassows, Pheasants, and Relatives)

FAMILY: ODONTOPHORIDAE (New World Quail)

California Quail (*Callipepla californica*)

FAMILY: PHASIANIDAE (Grouse, Turkeys, and Old World Quail)

Wild Turkey (*Melegris gallopavo*)
*Domestic Chicken (*Gallus gallus domesticus*)

ORDER: COLUMBIFORMES (Pigeons and Doves)

FAMILY: COLUMBIDAE (Pigeons and Doves)

Band-tailed Pigeon (*Columba fasciata*)
*Mourning Dove (*Zenaida macroura*)

ORDER: CUCULIFORMES (Cuckoos and relatives)

FAMILY: CUCULIDAE (Typical Cuckoos)

Greater Roadrunner (*Geococcyx californianus*)

ORDER: STRIGIFORMES (Owls)

FAMILY: TYTONIDAE (Barn Owls)

Barn Owl (*Tyto alba*)

FAMILY: STRIGIDAE (Typical Owls)

Western Screech Owl (*Otus kennicottii*)
Great Horned Owl (*Bubo virginianus*)
Northern Pygmy-Owl (*Glaucidium gnoma*)

Northern Saw-whet Owl (*Aegolius acadicus*)

ORDER: CAPRIMULGIFORMES (Goatsuckers and Relatives)

FAMILY: CAPRIMULGIDAE (Goatsuckers)

Common Nighthawk (*Chordeiles minor*)

Common Poorwill (*Phalaenoptilus nuttalli*)

ORDER: APODIFORMES (Swifts and Hummingbirds)

FAMILY: TROCHILIDAE (Hummingbirds)

Black-chinned Hummingbird (*Archilochus alexandri*)

Anna's Hummingbird (*Calypte anna*)

Rufous Hummingbird (*Selasphorus rufus*)

ORDER: GRUIFORMES (Cranes and Rails)

FAMILY: RALLIDAE (Rails)

American Coot (*Fulica americana*)

ORDER: CHARADRIIFORMES (Shorebirds, Gulls, and relatives)

FAMILY: CHARADRIIDAE (Plovers and relatives)

Killdeer (*Charadrius vociferus*)

ORDER: CORACIIFORMES (Kingfishers and Relatives)

FAMILY: ALCEDINIDAE (Kingfishers)

Belted Kingfisher (*Ceryle alcyon*)

ORDER: PICIFORMES (Woodpeckers and Relatives)

FAMILY: PICIDAE (Woodpeckers and Wrynecks)

Lewis's Woodpecker (*Melanerpes lewis*)

*Acorn Woodpecker (*Melanerpes formicivorous*)

Red-breasted Sapsucker (*Sphyrapicus ruber*)

Nuttall's Woodpecker (*Picoides nuttallii*)

Downy Woodpecker (*Picoides pubescens*)

Hairy Woodpecker (*Picoides villosis*)

*Northern Flicker (*Colaptes auratus*)

ORDER: PASSERIFORMES (Perching Birds)

FAMILY: TYRANNIDAE (Tyrant Flycatchers)

Black Phoebe (*Sayornis nigricans*)

Say's Phoebe (*Sayornis saya*)

Ash-throated Flycatcher (*Myiarchus cinerascens*)

Western Kingbird (*Tyrannus verticalis*)

FAMILY: VIREONIDAE (Typical Vireos)

Hutton's Vireo (*Vireo huttoni*)

Warbling Vireo (*Vireo gilvus*)

FAMILY: HIRUNDINIDAE (Swallows)

Tree Swallow (*Tachycineta bicolor*)

Violet-green Swallow (*Tachycineta thalassina*)

Northern Rough-winged Swallow (*Stelgidopteryx serripennis*)

Cliff Swallow (*Hirundo pyrrhonota*)

Barn Swallow (*Hirundo rustica*)

FAMILY: CORVIDAE (Jays, Magpies, and Crows)

Western Scrub Jay (*Aphelocoma californica*)

*Steller's Jay (*Cyanocitta stelleri*)

*American Crow (*Corvus brachyrhynchos*)
Common Raven (*Corvus corax*)

FAMILY: PARIDAE (Titmice)

Oak Titmouse (*Baeolophus inornatus)*

FAMILY: AEGITHALIDAE (Bushtit)

Bushtit (*Psaltriparus minimus*)

FAMILY: SITTIDAE (Nuthatches)

White-breasted Nuthatch (*Sitta carolinensis*)

FAMILY: TROGLODYTIDAE (Wrens)

Rock Wren (*Salpinctes obsoletus*)
Bewick's Wren (*Thryomanes bewickii*)
House Wren (*Troglodytes aedon*)

FAMILY: POLIOPTILIDATE (Gnatcatchers and Gnatwrens)

Blue-gray Gnatcatcher (*Polioptila caerulea*)

FAMILY: CINCLIDAE (Dippers)

American Dipper (*Cinclus mexicanus*)

FAMILY: REGULIDAE (Kinglets)

Ruby-crowned Kinglet (*Corthylio calendula*)

FAMILY: SYLVIIDAE (Sylviid Warblers, Parrotbills, and Allies)

Wrentit (*Chamaea fasciata*)

FAMILY: TURDIDAE (Thrushes)

Western Bluebird (*Sialia mexicana*)
Hermit Thrush (*Catharus guttatus*)
American Robin (*Turdus migratorius*)

FAMILY: MIMIDAE (Mockingbirds and Thrashers)

* Northern Mockingbird (*Mimus polyglottos*)

FAMILY: PTILOGONATIDAE (Silky Flycatchers)

Phainopepla (*Phainopepla nitens*)

FAMILY: STURNIDAE (Starlings)

European Starling (*Sturnus vulgaris*

FAMILY: BOMBYCILLIDAE (Waxwings)

Cedar Waxwing (*Bombycilla cedrorum*)

FAMILY: PASSERELLIDAE (New World Sparrows)

*Spotted Towhee (*Pipilo maculatus*)
Lincoln's Sparrow (*Melospiza lincolnii*)
California Towhee (*Melozone crissalis*)
Dark-eyed Junco (*Junco hyemalis*)
Rufous-crowned Sparrow (*Aimophila ruficeps*)
Savannah Sparrow (*Passerculus sandwichensis*)
*Golden-crowned Sparrow (*Zonotrichia atricapilla*)
*White-crowned Sparrow (*Zonotrichia leucophrys*)

FAMILY: PARULIDAE (Wood-Warblers)

Orange-crowned Warbler (*Vermivora celata*)
Nashville Warbler (*Vermivora ruficapilla*)
*Yellow-rumped Warbler (*Dendroica coronata*)
Black-throated Gray Warbler (*Dendroica nigrescens*)

Townsend's Warbler (*Dendroica townsendi*)
Wilson's Warbler (*Wilsonia pusilla*)

FAMILY: ICTERIDAE (Blackbirds, Orioles and Allies)

Red-winged Blackbird (*Agelaius phoeniceus*)
Brewer's Blackbird (*Euphagus cyanocephalus*)
Brown-headed Cowbird (*Molothrus ater*)
Bullock's Oriole (*Icterus bullockii*)

FAMILY: FRINGILLIDAE (Finches)

*House Finch (*Carpodacus mexicanus*)
Lesser Goldfinch (*Carduelis psaltria*)

FAMILY: CARDINALIDAE (Cardinals and Allies)

Black-headed Grosbeak (*Pheucticus melanocephalus*)
Lazuli Bunting *Passerina amoena*)
Western Tanager (*Piranga ludoviciana*)

FAMILY: PASSERIDAE (Old World Sparrows)

*House Sparrow (*Passer domesticus*)

CLASS: MAMMALIA

ORDER: MARSUPIALIA (Opossums, Kangaroos, and Relatives)

FAMILY: DIDELPHIDAE (Opossums)

Virginia Opossum (*Didelphis virginiana*)

ORDER: INSECTIVORA (Shrews and Moles)

FAMILY: SORICIDAE (Shrews)

Ornate Shrew (*Sorex ornatus*)
Trowbridge's Shrew (*Sorex trowbridgii*)

FAMILY: TALPIDAE (Moles)

Broad-footed Mole (*Scapanus latimanus*)

ORDER: CHIROPTERA (Bats)

FAMILY: VESPERTILIONIDAE (Vespertilionid Bats)

Little Brown Myotis (*Myotis lucifugus*)
Yuma Myotis (*Myotis yumanensis*)
Long-eared Myotis, (*Myotis evotis*)
Fringed Myotis (*Myotis thysanodes*)
Long-legged Myotis (*Myotis volans*)
California Myotis (*Myotis californicus*)
Small-footed Myotis (*Myotis leibii*)
Western Pipistrelle (*Pipistrellus hesperus*)
Big Brown Bat (*Eptesicus fuscus*)
Hoary Bat (*Lasiurus cinereus*)
Townsend's Big-eared Bat (*Plecotus townsendii*)
Pallid Bat (*Antrozous pallidus*)

FAMILY: MOLOSSIDAE (Free-tailed Bat)

Brazilian Free-tailed Bat (*Tadarida brasiliensis*)
Western Mastiff Bat (*Eumops perotis*)

ORDER: LAGOMORPHA (Rabbits, Hares, and Pikas)

FAMILY: LEPORIDAE (Rabbits and Hares)

Brush Rabbit (*Sylvilagus bachmani*)
Desert Cottontail (*Sylvilagus audubonii*)
Black-tailed Hare (*Lepus californicus*)

ORDER: RODENTIA (Squirrels, Rats, Mice, and Relatives)

FAMILY: SCIURIDAE (Squirrels, Chipmunks, and Marmots)

*California Ground Squirrel (*Spermophilus beecheyi*)
Western Gray Squirrel (*Sciurus griseus*)

FAMILY: GEOMYIDAE (Pocket Gophers)

Botta's Pocket Gopher (*Thomomys bottae*)

FAMILY: CRICETIDAE (Deer Mice, Voles, and Relatives)

California Pocket Mouse (*Perognathus californicus*)
Western Harvest Mouse (*Reithrodontomys megalotis*)
California Mouse (*Peromyscus californicus*)
Deer Mouse (*Peromyscus maniculatus*)
Brush Mouse (*Peromyscus boylii*)
Dusky-footed Wood Rat (*Neotoma fuscipes*)
Meadow Vole (*Microtus californicus*)

ORDER: CARNIVORA (Carnivores)

FAMILY: CANIDAE (Foxes, Wolves, and Relatives)

*Coyote (*Canis latrans*)
Red Fox (*Vulpes vulpes*)
Gray Fox (*Urocyon cinereoargenteus*)
*Domestic Dog (*Canis lupus familiaris*)

FAMILY: PROCYONIDAE (Raccoons and Relatives)

Raccoon (*Procyon lotor*)

FAMILY: MUSTELIDAE (Weasels, Badgers, and Relatives)

Long-tailed Weasel (*Mustela frenata*)
Striped Skunk (*Mephitis mephitis*)

FAMILY: FELIDAE (Cats)

*Feral Cat (*Felis cattus*)
Mountain Lion (*Felis concolor*)
Bobcat (*Lynx rufus*)

ORDER: ARTIODACTYLA

FAMILY: BOVIDAE (Cattle, Buffalo and Allies)

*Domesticated Cow (*Bos taurus*)

FAMILY: CERVIDAE (Deer, Elk, and Relatives)

Mule Deer (*Odocoileus hemionus*)

ORDER: PERISSODACTYLA

FAMILY: EQUIDAE (Horses)

*Horse (*Equus ferus caballus*)

APPENDIX C: SELECTED SITE PHOTOGRAPHS



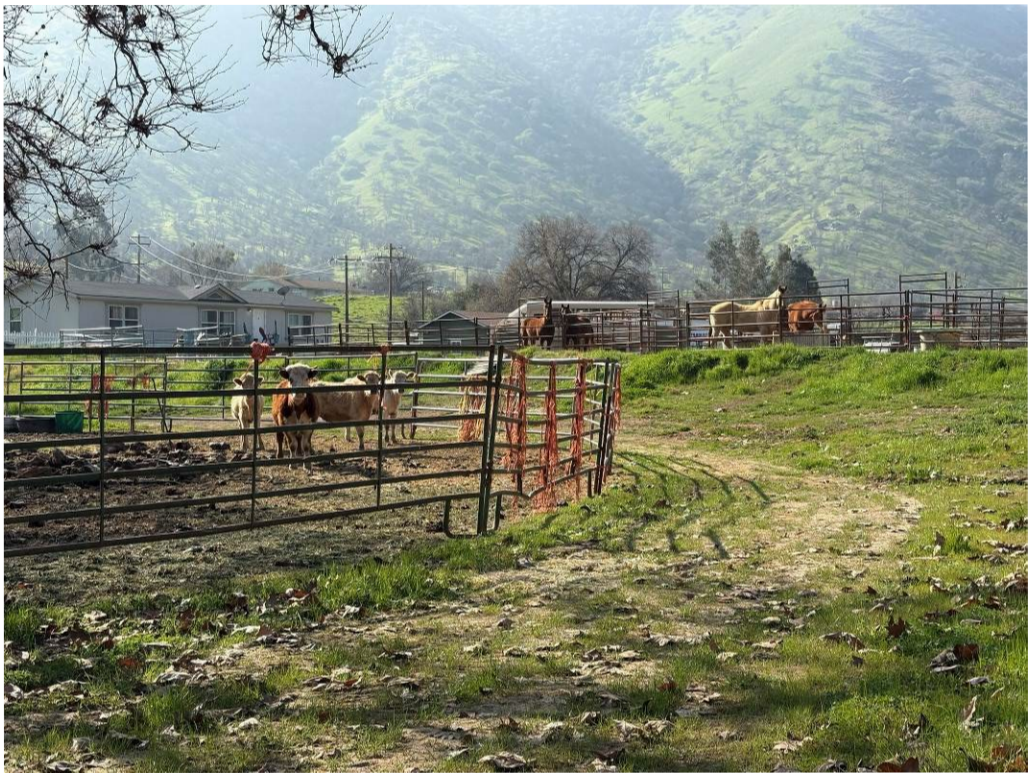


Photos 1 and 2: Representative photos of the study area's ruderal/developed lands (Village Center).



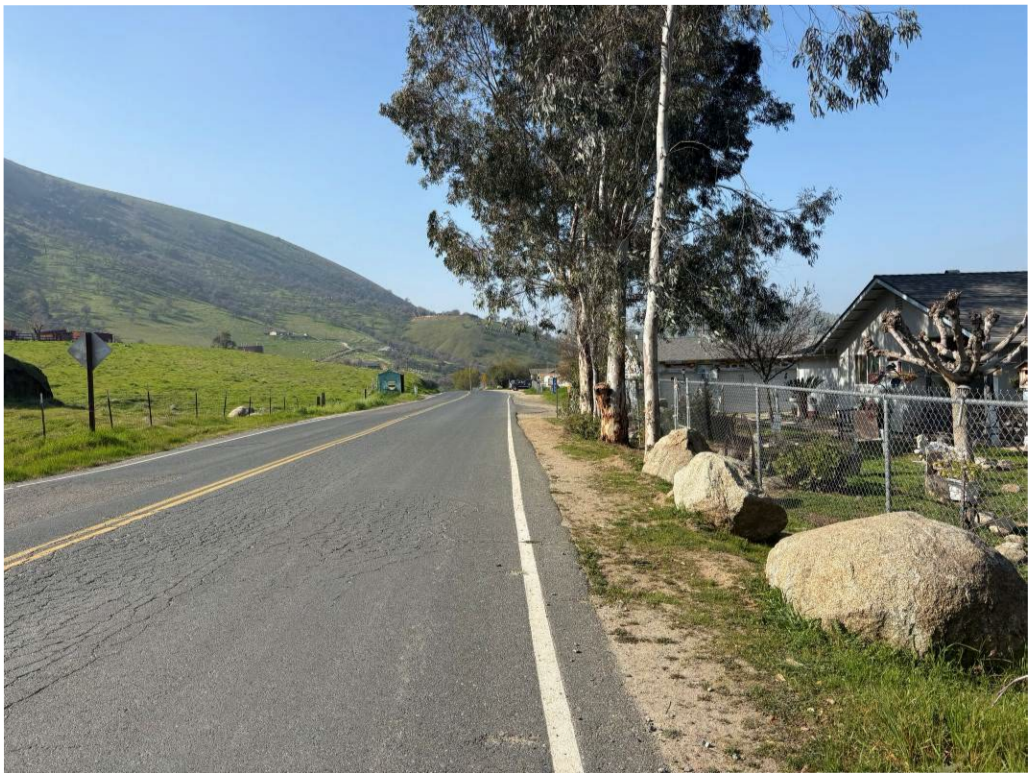
Photos 3 and 4: Representative photos of the study area's ruderal/developed lands (Village Center).





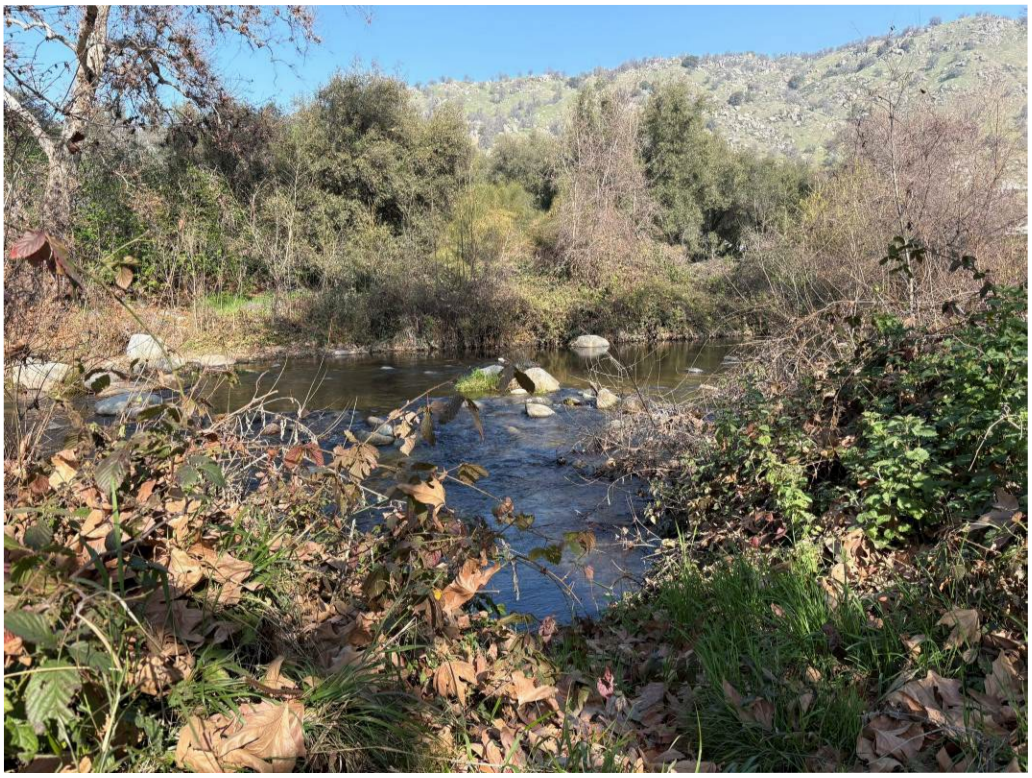
Photos 5 and 6: Representative photos of the study area's ruderal/developed lands (rural residences).



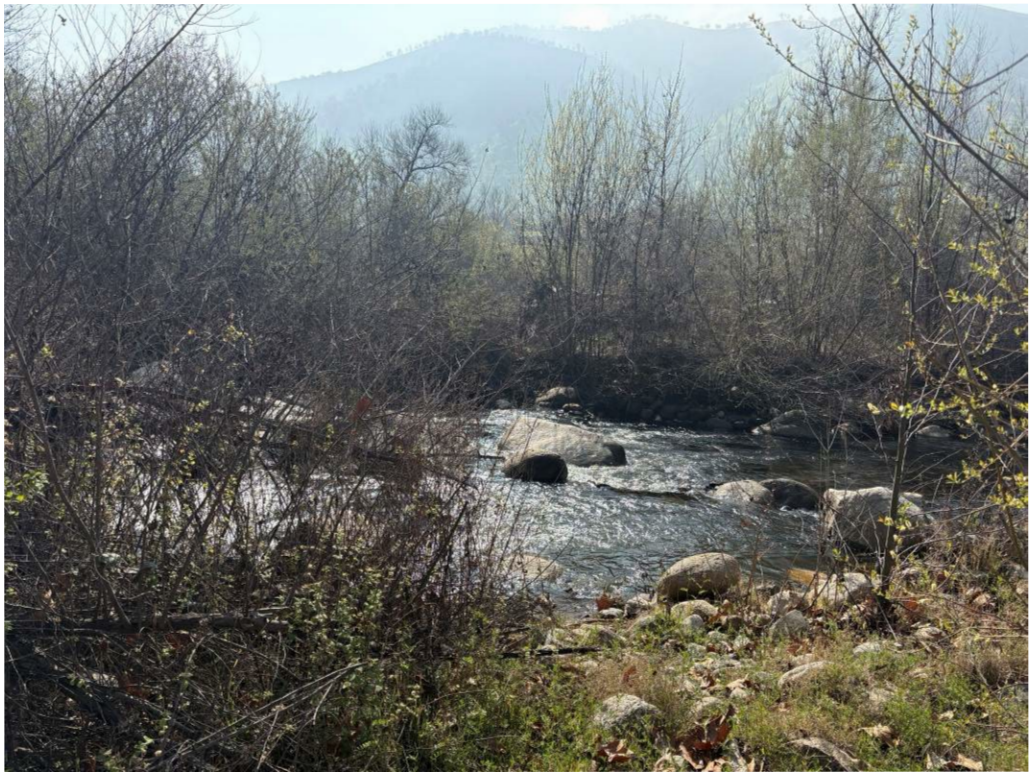


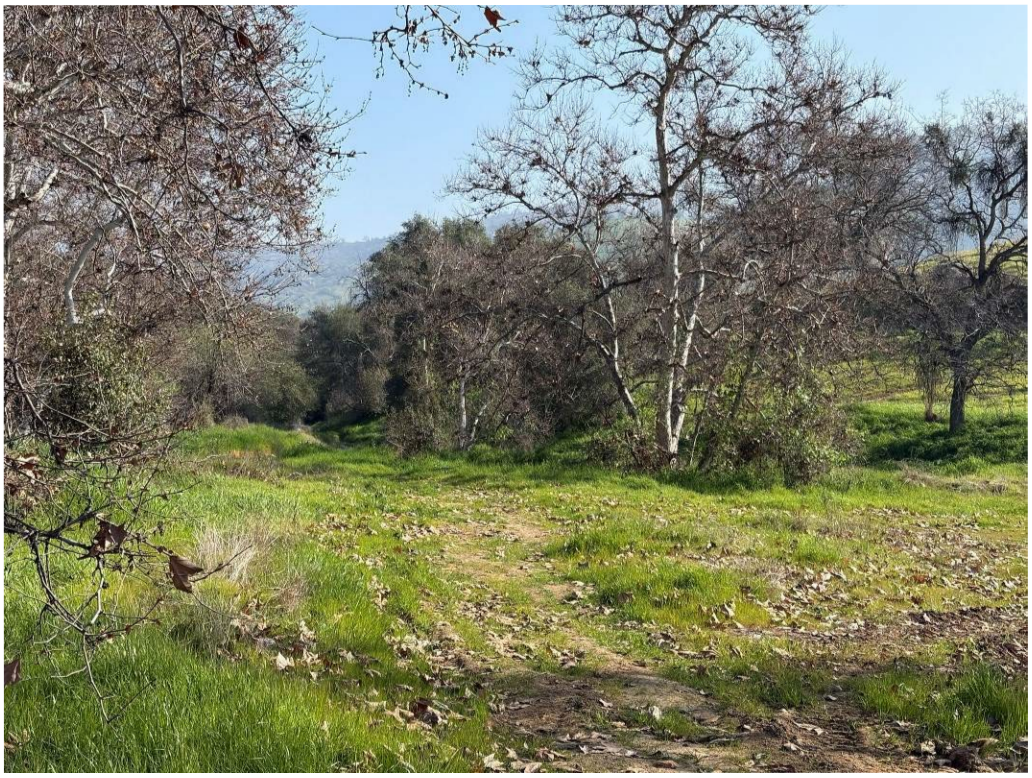
Photos 7 and 8: Representative photos of the study area's ruderal/developed lands (roads and roadsides).





Photos 9 and 10: Representative photos of the study area's river corridor, highlighting aquatic habitat.





Photos 11 and 12: Representative photos of the study area's river corridor, highlighting woodland habitat.





Photos 13 and 14: Photos of the existing pedestrian bridge to be replaced.



APPENDIX D: USFWS INFORMATION FOR PLANNING AND CONSULTATION UNOFFICIAL SPECIES LIST

Appendix C

Tribal Consultation Under CEQA

NATIVE AMERICAN HERITAGE COMMISSION

CHAIRPERSON
Reginald Pagaling
Chumash

VICE-CHAIRPERSON
Buffy McQuillen
Yokayo Pomo, Yuki, Nomlaki

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Pauma-Yuima Band of Luiseño Indians

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COMMISSIONER
Vacant

EXECUTIVE SECRETARY
Andrew Alejandre
Paskenta Band of Nomlaki Indians

NAHC HEADQUARTERS
1550 Harbor Boulevard
Suite 100
West Sacramento,
California 95691
(916) 373-3710
nahc@nahc.ca.gov

January 20, 2026

Sarah Weaver
City of Porterville

Via Email to: sweaver@ci.porterville.ca

Re: Tribal Consultation Under CEQA, Tule River Tribe Complete Streets & Two Pedestrian Bridges Phase 1 Project, Tulare County

To Whom It May Concern:

Pursuant to your request, attached is a consultation list of tribes that are traditionally and culturally affiliated with the geographic area of the above-listed project. Additionally, a search of the Native American Heritage Commission (NAHC) Sacred Lands File (SLF) was completed based on the information submitted for the above referenced project. The results were positive. Please contact the Tule River Indian Tribe on the attached list for more information. Be aware that tribes do not always record their sacred sites in the SLF, nor are they required to do so. As such, an SLF search is not a substitute for consultation with all tribes that are traditionally and culturally affiliated with a project's geographic area. Please contact all of the listed tribes as they may have information about sacred sites within the project area that is not listed with the NAHC.

Additionally, the NAHC recommends that agencies include with their notification letters, information regarding any cultural resources assessment that has been completed on the area of potential effect (APE), such as:

1. The results of any record search that may have been conducted at an Information Center of the California Historical Resources Information System (CHRIS), including, but not limited to:

- A listing of any and all known cultural resources that have already been recorded on or adjacent to the APE, such as known archaeological sites;
- Copies of any and all cultural resource records and study reports that may have been provided by the Information Center as part of the records search response;
- Whether the records search indicates a low, moderate, or high probability that unrecorded cultural resources are located in the APE; and
- If a survey is recommended by the Information Center to determine whether previously unrecorded cultural resources are present.

2. The results of any archaeological inventory survey that was conducted, including:

- Any report that may contain site forms, site significance, and suggested mitigation measures.

All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for public disclosure in accordance with Government Code section 6254.10.

3. The result of the Sacred Lands File check conducted through the Native American Heritage Commission.

4. Any ethnographic studies conducted for any area including all or part of the APE; and

5. Any geotechnical reports regarding all or part of the APE.

Lead agencies should be aware that records maintained by the NAHC and CHRIS are not exhaustive and a negative response to these searches does not preclude the existence of a tribal cultural resource. A tribe may be the only source of information regarding the existence of a tribal cultural resource, which is why consultation is vital.

This information will aid tribes in determining whether to request formal consultation. If consultation is requested, having the information beforehand will help to facilitate the process.

If you receive notification of a change of address or phone number from a tribe, please inform the NAHC. With your assistance, we can assure that our consultation list remains current.

If you have any questions, please contact me at my email address: melina.carlos@nahc.ca.gov

Sincerely,

Melina Carlos

Melina Carlos
Cultural Resources Analyst

Attachment