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MEMORANDUM

DATE: May 6, 2026

TO: Kimberly Alvarado Vega
Utilities and On Site Project Management, Capital Projects Department
City of Fresno

FROM: Kyle Simpson, Principal

SUBJECT: Class 32 Categorical Exemption for the H-Street Parking Building Project [Task Order No. 2301-021; Project No. CP00008 (formerly PW01075)] LSA Project No. CFO2202.10

Pursuant to Section 15367 of the State of California Guidelines for Implementation of the California Environmental Quality Act (CEQA Guidelines), the City of Fresno (City) is the Lead Agency under the California Environmental Quality Act (CEQA) for consideration of the H-Street Parking Building Project (project, also proposed project).

Pursuant to *State CEQA Guidelines* Section 15332(a-e) (Class 32: In-Fill Development Projects), the City finds the proposed project categorically exempt from CEQA. The project includes development of a site less than five acres in size in accordance with the City's General Plan land use and zoning designations; is substantially surrounded by urban uses; is not on a site containing habitat for endangered, rare, or threatened species; would not result in significant effects to traffic, noise, air quality, or water quality; and would be adequately served by all required utilities and public services.

Pursuant to *State CEQA Guidelines* Section 15300.2, the proposed project does not trigger any exceptions to the Class 32 (Section 15332) Categorical Exemption. The project is not located along a State scenic highway or on a hazardous waste site as defined in Section 65962.5 of the Government Code; would not result in any significant effect to the environment as a result of unusual circumstances or cumulatively considerable effects; and would not cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5 of the *State CEQA Guidelines*.

The following provides an overview of the proposed project and existing site conditions and an analysis which demonstrates the proposed project's compliance with the conditions set forth in *State CEQA Guidelines* Sections 15332 and 15300.2.

PROJECT DESCRIPTION AND EXISTING SETTING

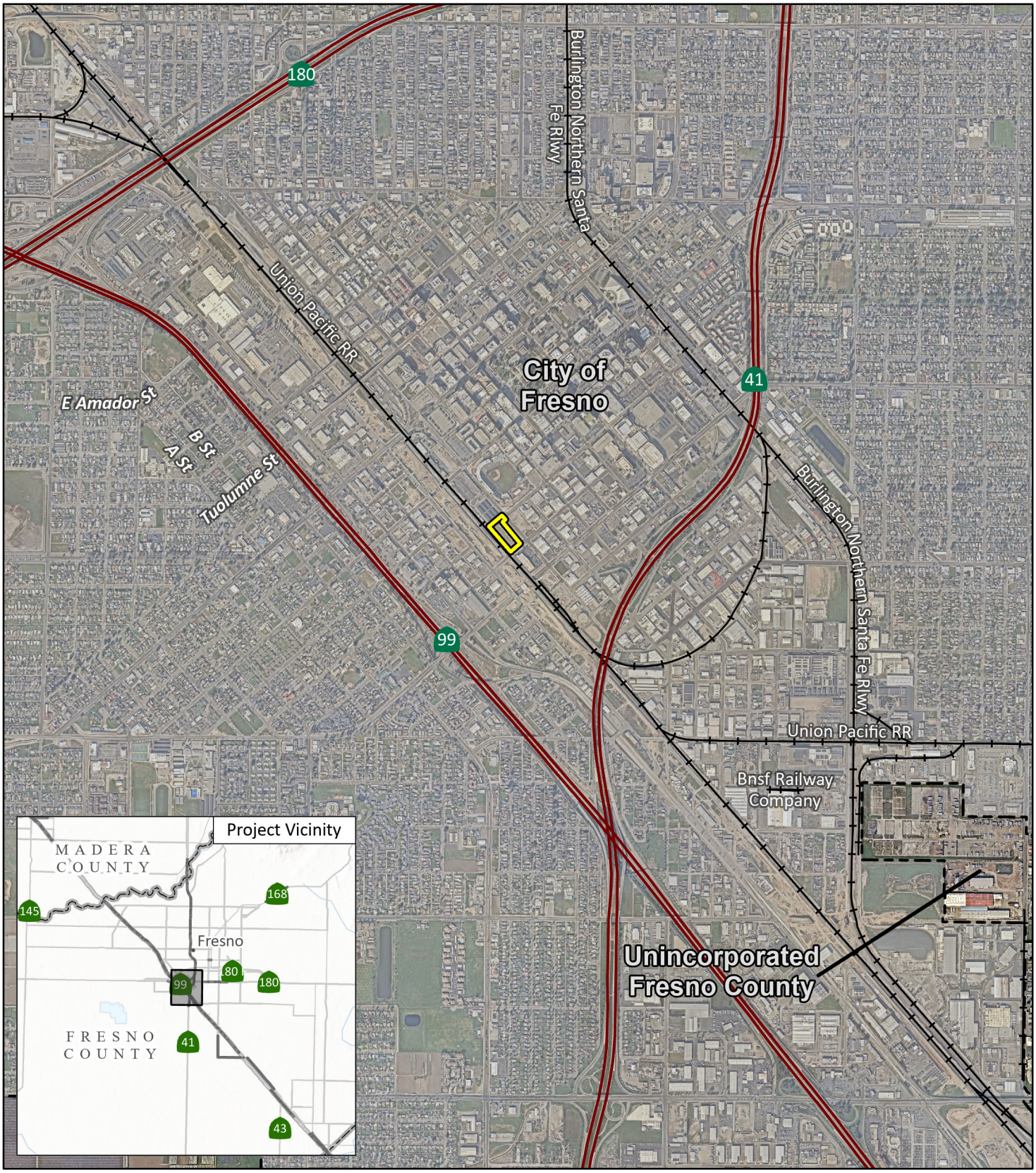
The project includes development of a 294,118-square-foot, seven-level open air parking structure with 904 total parking spaces on a 2.26-acre site (project site). The project site is located within the Downtown Core (DTC) base zoning district and has a land use designation of Downtown Core (DTC). The project site is located within the Downtown Community Plan Area and the Fulton Corridor Specific Plan. The project site is comprised of one parcel (Assessor's Parcel Numbers [APNs] 467-040-43ST, formerly 467-040-20S and 467-040-22S) and is located southwest of the intersection of H Street and Mono Street. In addition, the project includes vacation of a small portion of Mono Street to facilitate the construction of the proposed parking building.

The project site is slightly rotated relative to the cardinal directions. For clarity and consistency throughout this document, the project site boundaries are referenced according to adjacent features rather than true cardinal orientation, to align with the project's site plans. The northeastern boundary runs parallel to H Street and is referred to as the northern edge. The southeastern boundary runs parallel to Mono Street and is referred to as the eastern edge. The southwestern boundary runs parallel to the Union Pacific railroad tracks and is referred to as the southern edge. The northwestern boundary runs parallel to the internal driveway extending from Inyo Street and is referred to as the western edge. Surrounding land uses include Chukchansi Park to the north; surface parking with solar carports to the northwest; a dirt lot to the northeast; railroad tracks to the south, southwest, and southeast; and commercial uses to southeast. Additionally, the project site is adjacent to aboveground electrical power lines that run along Mono Street. Figure 1 depicts the location of the project site on a regional and local scale, and Figure 2 depicts the existing conditions of the project site and surrounding land uses.

The project site is currently developed as a surface parking lot and primarily consists of hardscape (e.g., asphalt, concrete, pavement), solar carport foundations, light poles, and a chain-link fence that encloses the southern and eastern edges of the property. Trees and associated landscaping also line the eastern edge of the parking lot, and minimal landscaping also lines the southern edge of the parking lot.

Construction of the project would include the demolition of the existing development on-site, with the exception of a portion of an existing drive aisle on-site (extending from Inyo Street) and two existing street trees, one located at the southwestern corner of the H Street and Mono Street intersection and the other located at the southwestern corner of the H Street and Inyo Street intersection.

The project would include construction and operation of a 294,118-square-foot, seven-level open air parking building with associated paving, landscaping, screening, and lighting. The parking building would be rectangular-shaped, sloping in height from its western edge to its eastern edge, ranging in height from approximately 80 feet to 65 feet. The parking structure would provide a total of 904 parking spaces delineated into 15 parking areas. The parking structure would include standard parking spaces, electric vehicle (EV) capable spaces, EV equipped charging stations, accessible parking spaces, and motorcycle parking spaces. Additionally, the parking building would provide 47 bicycle parking spaces.



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Project Location

FIGURE 1

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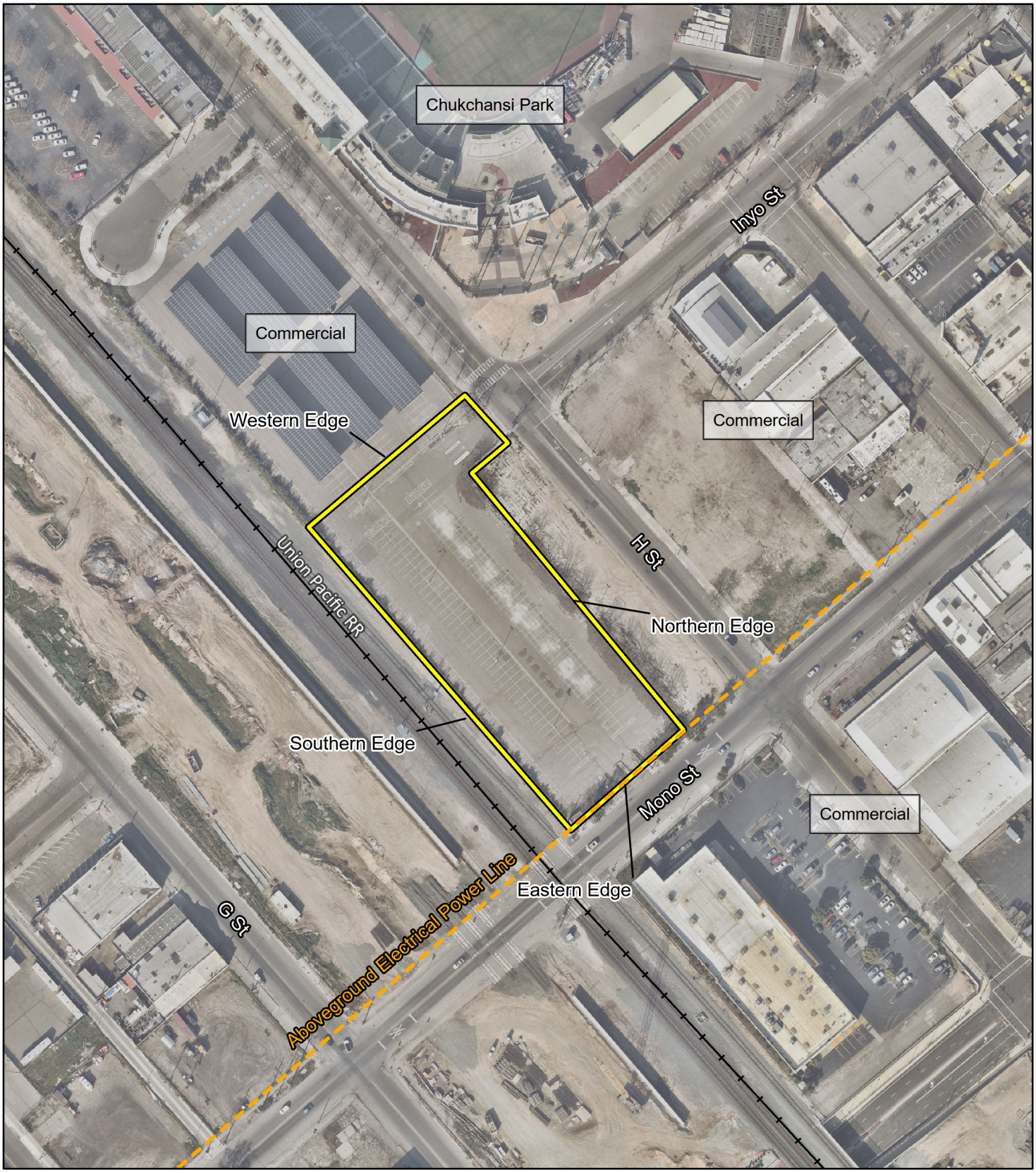
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SOURCE: Nearmap (2/08/2026)

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Class 32 Categorical Exemption for the H-Street Parking Building Project

Project Location



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Project Location

FIGURE 2

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Class 32 Categorical Exemption for the H-Street Parking Building Project

Existing Setting

SOURCE: Nearmap (2/08/2026)

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The project would include off-site improvements within the Mono Street and Inyo Street rights-of-way. Along Mono Street, improvements would extend from the existing right-of-way and include construction of new sidewalks, curbs, and gutters along the project frontage, as well as undergrounding of the existing aboveground electrical power lines that run along the western side of Mono Street. These improvements would consist of a rolled curb adjacent to the fire access lane, a standard 6-inch curb and gutter along the western sidewalk segment between the fire access lane and the site entrance, and along the southern side of the entrance to tie into the existing sidewalk. Valley gutters would be installed along the street frontage to facilitate drainage. Landscaping improvements would include planting areas along the southern curb of Mono Street, between the project's entry and exit driveways, along the sidewalk frontage between the entrance and fire access lane, and tree wells integrated within the sidewalk. Along Inyo Street and the associated internal driveway connection, existing sidewalk and curb infrastructure at the driveway entrance would be retained. New sidewalk and 6-inch curb would extend the existing improvements to connect to the proposed fire access lane, which would be bordered by rolled curbs. Additional improvements along the western edge of the internal driveway would include curb, gutter, and asphalt paving to delineate the boundary between the existing parking lot and the proposed project. Landscaping areas along the project frontage on the internal driveway would be defined by 6-inch curbs, and a valley gutter would be installed across the site access point to manage surface drainage.

Off-site improvements associated with the proposed project would include improvements along H Street, at the intersection of H Street and Inyo Street, and at the intersection of Mono Street and H Street. Along the project frontage on H Street, improvements would include construction of new curb and gutter between the Inyo Street and Mono Street intersections. The project would also include removal of existing asphalt concrete pavement to approximately 6 feet beyond the roadway centerline, followed by reconstruction to accommodate updated roadway configurations, including left-turn lanes, bicycle lanes, and parallel parking along the southern side of the street. A 6-foot-wide temporary asphalt/concrete sidewalk would be constructed behind the curb. At the intersection of H Street and Inyo Street, improvements would include construction of a new traffic signal with downtown decorative poles, incorporating protected left-turn phasing. Additionally, the proposed project would include reconstruction of curb ramps on the northeast corner of the intersection with truncated domes, and construction of new bulb-out curb returns with associated curb ramps on the southwest corner. Improvements would also include reconstruction of the Fresno Metropolitan Flood Control District (FMFCD) drainage inlet and lateral between the new curb ramps. All existing traffic signal infrastructure would be removed and replaced with new infrastructure at all four approaches, including installation of new ornamental poles, mast arms, and a signal controller, as well as incorporation of a pedestrian scramble phase. Inyo Street, northeast of the intersection, and H Street, northwest of the intersection, would be sealed and restriped to accommodate revised lane geometry. At the intersection of Mono Street and H Street, improvements would include reconstruction of curb ramps on the southeast corner with truncated domes, installation of new bulb-out curb returns with associated curb ramps on the northwest corner, and removal of existing ornamental and cobrahead streetlights currently served by overhead utilities. Four new pedestrian safety lights would be installed, one at each corner of the intersection. In addition, Mono Street, northeast of the intersection, and H Street, southeast of the intersection, would be resealed and restriped to accommodate revised lane geometry, and new stop signs would be installed at each approach.

Primary vehicular access to and from the parking building would be provided by one east entry and exit driveway (three lanes) connecting to Mono Street, located on the ground floor (refer to Figure 3). Emergency and potential residential access would be provided by one west entry and exit driveway (two lanes) connecting to the existing internal driveway providing access to Inyo Street/H-Street . Directional arrows would be painted on the surface of access lanes. Visibility triangles at entrance points would be constructed per Fresno Municipal Code (FMC) requirements. The proposed project includes a fire access lane parallel to H Street, located between the adjacent property and the parking structure. Access would be provided via a driveway from the existing internal driveway connecting to Inyo Street leading to a 26-foot-wide concrete lane with rolled curbs designated as fire lanes. Egress is provided by a driveway on Mono Street, approximately 100 feet west of the H Street intersection. The project includes an 8-foot-tall metal chain-link fence that would be installed along the southern edge (parallel to the railroad) and along the northern edge of the parking structure between the parking structure and the fire access lane. The northern edge and southern edge of the project site would be bound by planting areas. The project includes planting of approximately 29trees, consisting of Armstrong red maple (*Acer rubrum 'armstrong'*), valley oak (*Quercus lobata*), coast live oak (*Quercus agrifolia*), and prospector elm (*Ulmus wilsoniana*). Additional landscaping would be incorporated through a combination of accent plantings, groundcovers, shrubs, and vines along the western edge, southern edge, both sides of the fire access lane, and surrounding ingress/egress driveways (refer to Figure 4). All planting areas would include up to 3 inches of mulch groundcover. Proposed landscaping and irrigation would conform to Article 23 of the FMC and other City standards.

The project would install two storm drain inlets on-site to manage stormwater runoff from the 2.26-acre site. Proposed permeable surfaces such as landscaped areas would infiltrate stormwater naturally. Runoff would be conveyed via a 12-inch polyvinyl chloride (PVC) sewer pipe and tie into an existing 36-inch storm drain main located within the internal driveway connecting to Inyo Street at the western edge of the project site.

The project would include installation of curb, gutter, and concrete sidewalk along the internal driveway connecting to Inyo Street, and along the project frontage on Mono Street. The project includes interconnection to utilities such as water, stormwater, electrical, sewer, and telecommunications within H Street, Inyo Street, the internal driveway connecting to Inyo Street, and Mono Street rights-of-way for service to the project site. Existing water facilities along Mono Street would be relocated behind the fire access lane curb.

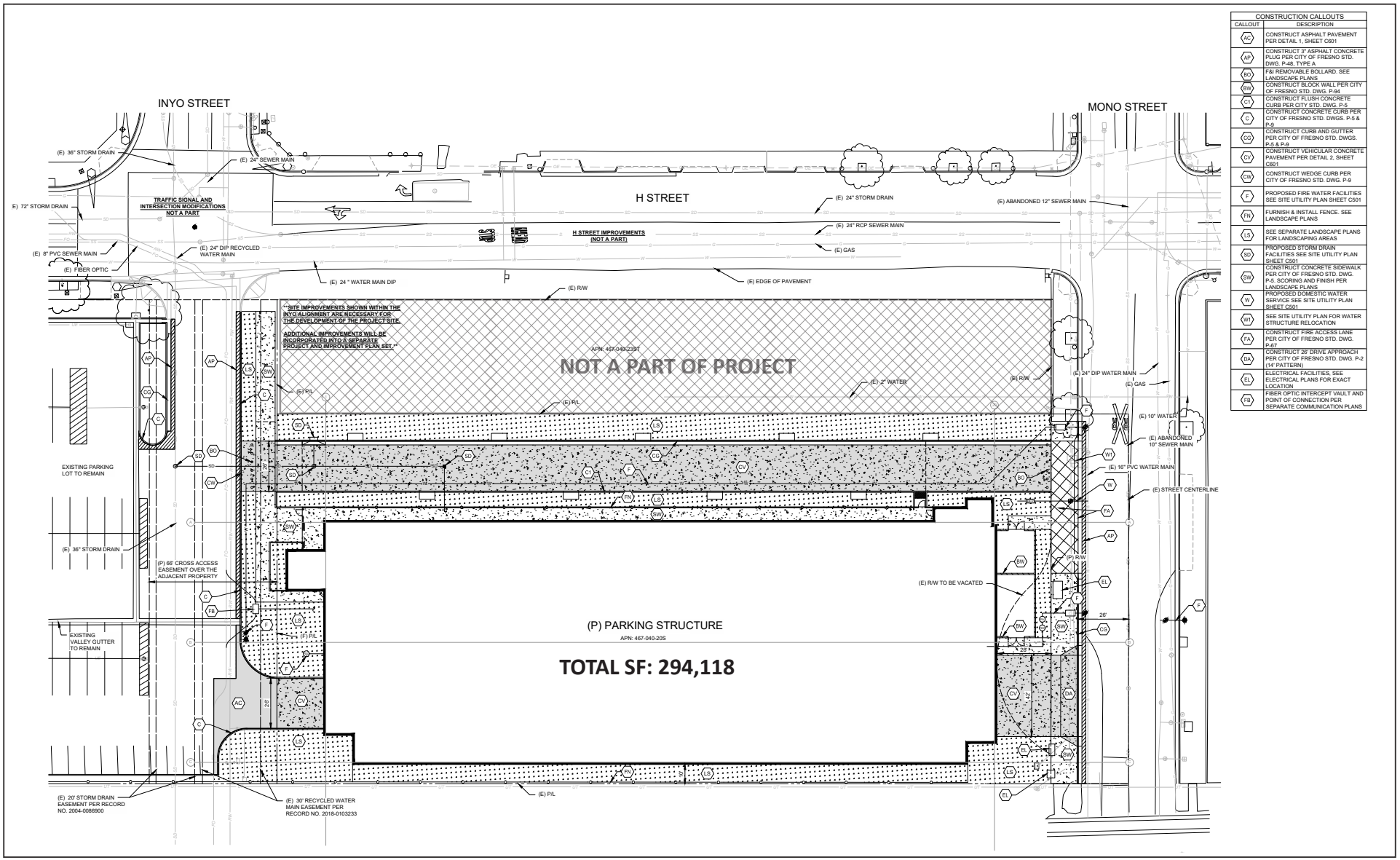


FIGURE 3

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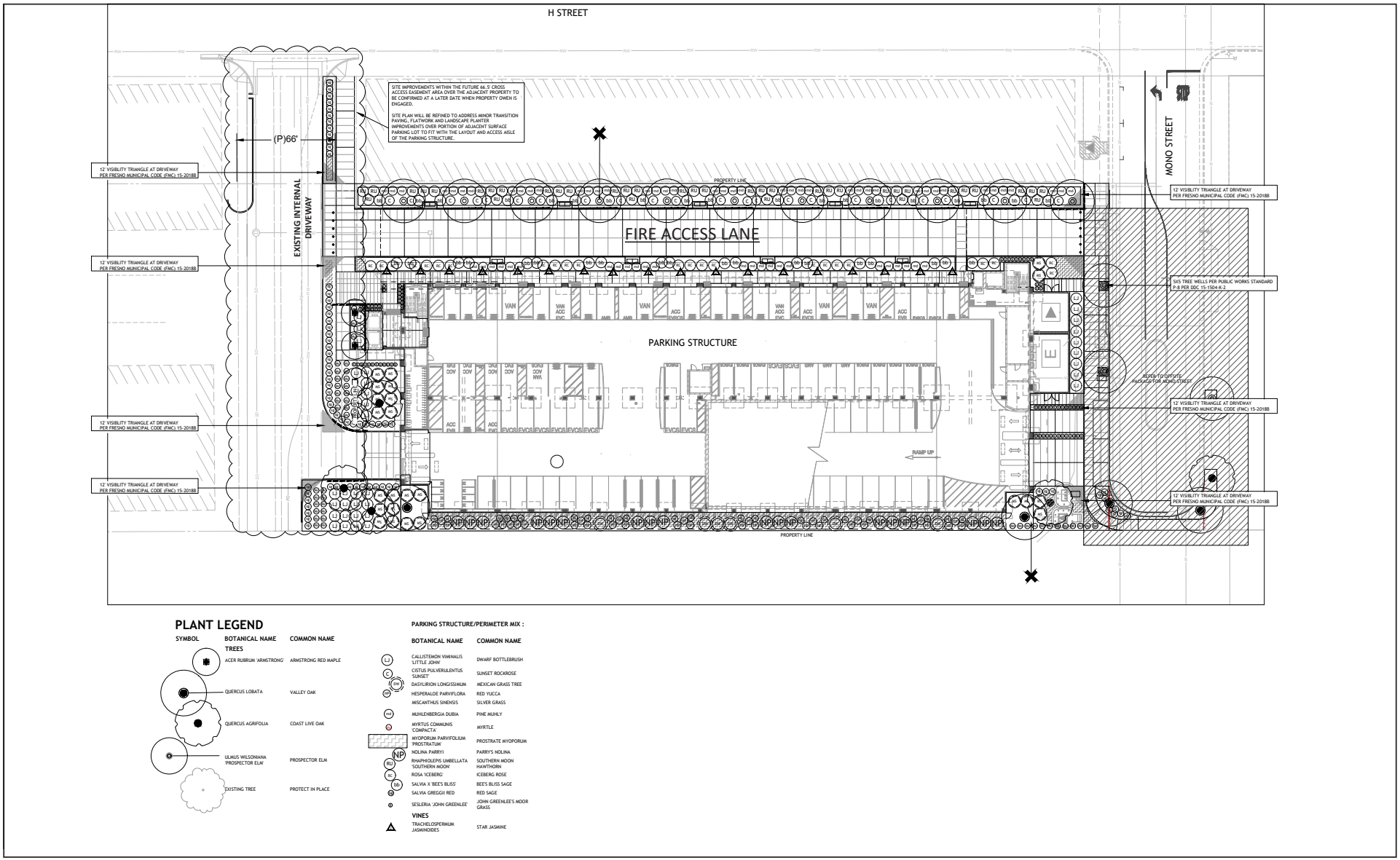
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Class 32 Categorical Exemption for the H-Street Parking Building Project

Conceptual Site Plan



PLANT LEGEND

SYMBOL	BOTANICAL NAME	COMMON NAME
	TREES	
	ACER RUBRUM 'ARMSTRONG'	ARMSTRONG RED MAPLE
	QUERCUS LOBATA	VALLEY OAK
	QUERCUS AGRIFOLIA	COAST LIVE OAK
	ULMUS WILSONIANA 'PROSPECTOR ELM'	PROSPECTOR ELM
	EXISTING TREE	PROTECT IN PLACE

PARKING STRUCTURE/PERIMETER MIX :

BOTANICAL NAME	COMMON NAME
CALLISTEMON VIMINALIS 'LITTLE JOHN'	DWARF BOTTLEBRUSH
CISTUS PULVERULENTUS 'SUNSET'	SUNSET ROCKROSE
DASYLIRION LONGISSIMUM	MEXICAN GRASS TREE
HESPERALOE PARVIFLORA	RED YUCCA
MISCANTHUS SINENSIS	SILVER GRASS
MUHLENBERGIA DUBIA	PINE MUHLY
MYRTUS COMMUNIS 'COMPACTA'	MYRTLE
MYOPORUM PARVIFOLIUM 'PROSTRATUM'	PROSTRATE MYOPORUM
NOLINA PARRYI	PARRY'S NOLINA
RHAPHIOLEPIS UMBELLATA 'SOUTHERN MOON'	SOUTHERN MOON HAWTHORN
ROSA 'ICEBERG'	ICEBERG ROSE
SALVIA X 'BEE'S BLISS'	BEE'S BLISS SAGE
SALVIA GREGGII RED	RED SAGE
SESLERIA 'JOHN GREENLEE'	JOHN GREENLEE'S MOOR GRASS
VINES	
TRACHELOSPERMUM JASMINOIDES	STAR JASMINE

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FIGURE 4

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SOURCE: CPC

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Class 32 Categorical Exemption for the H-Street Parking Building Project

Proposed Planting Plan

EVALUATION OF CLASS 32 (IN-FILL) EXEMPTION CRITERIA

Section 21084 of the Public Resources Code requires the *State CEQA Guidelines* to include a list of classes of projects which have been determined not to have a significant effect on the environment and which shall, therefore, be exempt from environmental review pursuant to CEQA. In response to that mandate, the Secretary for Natural Resources identified various classes of projects in the *State CEQA Guidelines* that do not have a significant effect on the environment to be categorically exempt. Class 32 (Section 15332 of the *State CEQA Guidelines*) consists of projects characterized as in-fill development meeting the conditions described in this section. The analysis below concludes, based on substantial evidence, that the project qualifies for a categorical exemption under *State CEQA Guidelines* Section 15332 and, as a result, would not have a significant effect on the environment. In addition, the analysis shows that none of the exceptions identified in *State CEQA Guidelines* Section 15300.2 apply; therefore, the proposed project is categorically exempt from CEQA review.

(a) The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations.

The proposed project is located within the City of Fresno and is subject to the City's long-range planning framework, which guides land use, development patterns, and regulatory standards. The project site is governed by the Fulton Corridor Specific Plan (FCSP), the Citywide Development Code, the Downtown Neighborhoods Community Plan (DNCP), and the City of Fresno General Plan.

Fulton Corridor Specific Plan (FCSP). When reviewing development projects within the FCSP area, the City evaluates consistency with the FCSP's policies and compliance with applicable development standards in the Citywide Development Code. Within the FCSP area, the FCSP's policies and standards take precedence over more general City policies and standards pursuant to FMC Section 12-604.

The project site is located within the South Stadium subarea of the FCSP, a predominantly industrial district defined by one- and two-story buildings occupied by warehousing, manufacturing, auto repair, and automotive-related uses, along with social service organizations.[1] The area has experienced substantial demolition over time, resulting in numerous vacant parcels, surface parking lots, and service yards, which contribute to its underutilized character despite a well-connected, pedestrian-scaled block pattern.[2] The planned vision emphasizes infill development to transform South Stadium into a mixed-use district that introduces housing, creative offices, specialty retail, and restaurants while retaining its industrial character and allowing existing industrial and auto-related uses to continue.[3] The FCSP contains goals and policies across key topic areas, including building and development, historic preservation, public realm, transportation, and infrastructure, which collectively serve as the basis for assessing project-level consistency.

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1 City of Fresno. 2016. *Fulton Corridor Specific Plan. Chapter 3: Plan Framework and Goals.* Page 3:14. October 2016. Website: https://www.fresno.gov/wp-content/uploads/2023/04/161020FCSPFinallowres1-1.pdf (accessed on March 20, 2026).

2 *Ibid.* Page 3:14.

3 *Ibid*. Page 3:14.

Infill is intended to occur through new buildings up to six stories located at or near the street, with parking accommodated in shared lots or on-site, alongside streetscape improvements and adaptive reuse of older buildings.[4] Collectively, these strategies highlight the transition from dispersed surface parking toward more efficient, integrated parking solutions that support higher-intensity mixed-use development.

The proposed project consists of the construction of a 294,118-square-foot, seven-level open-air parking structure with 904 parking spaces on a currently developed surface parking lot site. The proposed project is consistent with the FCSP as it implements the plan's core objective of infill development by replacing an existing surface parking lot with a structured parking facility that intensifies land use on an underutilized site and supports the broader transition away from dispersed surface parking. The project provides a consolidated parking resource serving both residential and commercial uses, consistent with FCSP policies that promote shared parking and a "park once" strategy to support Downtown activity and reduce the need for a parcel-by-parcel parking provision.[5] While the project does not include ground-floor active uses or mixed-use components and exceeds the illustrative six-story height referenced in the South Stadium subarea, it remains consistent with the overall intent of the FCSP by facilitating higher-intensity development, supporting surrounding land uses including Chukchansi Park and adjacent commercial areas, and enabling future mixed-use infill by providing centralized parking infrastructure. The project also incorporates streetscape improvements, landscaping, and pedestrian-oriented elements along its frontages, consistent with public realm policies, and is compatible with the subarea's existing industrial and parking-dominated character. Overall, the project is consistent with the FCSP's goals and policies related to infill development, parking management, and Downtown revitalization.

Citywide Development Code. Fresno's Citywide Development Code was designed to be harmonious with the goals and policies of the FCSP and serves as the primary mechanism for ensuring physical development within the FCSP is in adherence with the Plan's vision. The project site is zoned as Downtown Core (DTC).[6] Some development standards within the DTC zone apply based on the Activity Classification of the adjacent street, which are classifications based on pedestrian activity and potential for pedestrian use. The only street with adjacent project frontage is Mono Street, which is classified as Activity Class C, which is defined as a street that is walkable and comfortable for pedestrians but is considered the least active classification within downtown.[7]

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4 City of Fresno. 2016. *Fulton Corridor Specific Plan. Chapter 3: Plan Framework and Goals.* Page 3:14. October 2016. Website: https://www.fresno.gov/wp-content/uploads/2023/04/161020FCSPFinallowres1-1.pdf (accessed on March 20, 2026).

5 *Ibid*. Page 9:2.

6 City of Fresno. 2016. *Official Zoning Map.* Website: https://www.fresno.gov/wp-content/uploads/2023/08/OfficialZoningMap2023.pdf (accessed March 20, 2026).

7 City of Fresno. 2026. *Citywide Development Code, Including Revisions.* Article 15. Downtown Districts. Section 15-1501.C. Website: https://library.municode.com/ca/fresno/codes/code_of_ordinances?nodeId=MUCOCHFRCA_CH15CIDECOINRE_PTIIBAOVDI_ART15DODI (accessed on March 20, 2026).

Permitted uses within the DTC, Activity Class C, include parking, either public or private.[8] For parking uses, required setbacks for this zone include a minimum 0-foot front setback, a maximum 10-foot front setback, a 90 percent minimum front street frontage cover, 15 maximum levels, a maximum height of 190 feet, and a minimum height of 18 feet.[9] Section 15-1504-G, Parking Buffering, requires that all parking facilities, whether public or private, shall be buffered as shown on Table 15-1503 based on the adjacent street activity classification. For parking structures adjacent to Activity Class C streets, the ground floor of the parking structure must be located behind active, occupied building space for a depth of no less than 30 feet.[10] Section 15-1504-H**,** Parking Access and Entrance Design, requires corner lots without alley access, such as the proposed project, to be accessed from the street with the lowest Activity Classification. If all adjacent streets have the same Activity Classification, the parking and service areas should be accessed from the street with the least potential for pedestrian activity.[11]

The proposed project includes development of a seven-level open-air parking structure on a site zoned DTC, with an adjacent street Activity Classification of C. The project represents a permitted use within the zone and adheres to most applicable development standards, including height, which at an average of approximately 75.23 feet is within the allowed range, and intensity, which is below the maximum of 15 levels. The project complies with Section 15-1504-H, as site access is provided from Mono Street, the adjacent Activity Class C street with the lowest pedestrian activity. The project also incorporates frontage improvements consistent with Section 15-1504-K, including installation of curb, gutter, and sidewalk along Mono Street, and tree wells that meet dimensional and spacing requirements outlined in Table 15-1504-K-2.[12]

The project does not meet certain frontage-related design standards, including the 90 percent minimum frontage coverage requirement and the buffering requirement of Section 15-1504-G. The proposed structure consists solely of parking and does not include ground-floor tenant space. However, the project achieves approximately 86 percent frontage coverage, closely approaching the 90 percent requirement. The Mono Street frontage is the only street frontage for the site and is limited in extent, measuring approximately 126 feet. Additionally, the frontage is located directly adjacent to the Union Pacific Railroad crossing, an area with constrained pedestrian activity. In this context, the frontage functions as a minor interface rather than a primary pedestrian corridor. Additionally, the project incorporates landscaping along much of the Mono Street frontage, outside of driveway access points and the fire access lane, consistent with Citywide Development Code provisions allowing portions of parking to be screened by landscaping along Activity Class C streets.[13]

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8 City of Fresno. 2026. *Citywide Development Code, Including Revisions.* Article 15. Downtown Districts. Section 15-1501.C. Table 15-1502. Use Regulations. Website: https://library.municode.com/ca/fresno/codes/code_of_ordinances?nodeId=MUCOCHFRCA_CH15CIDECOINRE_PTIIBAOVDI_ART15DODI (accessed on March 20, 2026).

9 *Ibid.* Table 15-1502. Use Regulations.

10 *Ibid.* Section 15-1504-G. Parking Buffering.

11 *Ibid.* Section 15-1504-H. Parking Access and Entrance Design.

12 *Ibid.* Section 15-1504-K. Sidewalk and Public Frontage Standards.

13 *Ibid.* Section 15-1504-G.3. Parking Buffering. Activity Class C.

Notwithstanding these minor deviations, the project remains consistent with the overall intent of the Citywide Development Code, which is to implement the vision of the FCSP by promoting infill development, efficient land use, and consolidated parking strategies within Downtown. The project replaces an existing surface parking lot with a leveled parking structure, intensifies development on an underutilized site, and provides shared parking to support surrounding commercial and proposed residential uses. In total, the project complies with the applicable provisions of the DTC zone as a permitted use and furthers the Citywide Development Code's overarching objectives for parking within the Downtown area.

Downtown Neighborhoods Community Plan (DNCP). The project site is located within the Downtown District of the Downtown Neighborhoods Community Plan, a major employment center with approximately 30,000 jobs and the highest concentration of historic resources in Fresno.[14] Existing land uses include visitor-serving and commercial uses such as the Fresno Convention Center, Chukchansi Park, hotels, and a mix of retail, restaurant, entertainment, office, civic, and industrial uses.[15] However, according to the Community Plan, many uses are underperforming, vacancy rates are high, residential development is limited, and the area contains excess parking.[16] The plan emphasizes infill development to introduce low- to mid-rise, pedestrian-oriented buildings that activate underutilized sites, reduce excess parking, and support a more balanced mix of residential, commercial, and entertainment uses. The DNCP provides a vision for parking within the Downtown District, with a goal of managing parking as a complete system, relieving individual property owners of needing to provide parking demands on-site, and emphasizing a "park once" strategy.[17]

The DNCP prescribes goals and policies to align with the proposed vision of the Downtown District applicable to the proposed project. The following goals and policies of the DNCP apply to the proposed project:

- **Goal 3.5:** Manage parking to serve residents, businesses and visitors.[18]
    - **Policy 3.5.1:** Treat parking as a utility that is shared by many uses in the surrounding area.
    - **Policy 3.5.2:** Approach parking as an integrated system of on-street and off-street spaces.
    - **Policy 3.5.3:** Use parking restriction policies to manage traffic, improve air quality in the Downtown Neighborhoods, discourage illegal parking, and generate a revenue stream for parking infrastructure, public transit, bicycle and pedestrian facilities, and programs that attract businesses and customers Downtown.

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14 City of Fresno. 2016. *Downtown Neighborhoods Community Plan. Introduction*. *G. Introduction to Community Plan Areas.* Page 26. Website: https://www.fresno.gov/wp-content/uploads/2023/04/161020DNCPFinallowres1.pdf (accessed March 20, 2026).

15 *Ibid.* Page 26.

16 *Ibid.* Page 19.

17 *Ibid. Chapter 1: A Vision for Regenerating Downtown Fresno and its Neighborhoods. C. Planning Area by Planning Area Transformation.* Page 1:16.

18 *Ibid. Chapter 3: Transportation. E. Goals and Policies.* Page 3:9.

- **Policy 3.5.4:** As legally permitted, price parking as necessary to achieve specific availability targets at all times of day and all days of the week. To achieve this policy, implement the following:
  - Delegate to the City Manager and the Parking Services.
  - Division the authority to adjust parking prices to achieve availability targets.
  - Empower the Parking Division to operate public on-street spaces, off-street lots, and off-street garages as an integrated system.
  - Use parking payment technologies that allow motorists to pay easily with readily available payment media, including credit cards and cell phones.
- **Policy 3.5.5:** Strive for all new commercial parking to be shared, and work with private parking operators to share existing parking as part of a unified Park Once system.
- **Policy 3.6.4:** Provide bicycle parking (bike racks and bike lockers) and other necessary bicycle facilities such as wayfinding/signage at and to key destinations, including schools, retail districts, government buildings, jobs centers, and transit stations. The amount of bicycle parking should support expected future travel by bicycle transportation. (FCSP 7-7-2).[19]

The proposed project consists of the construction of a 294,118-square-foot, seven-level open-air parking structure with 904 parking spaces, including 47 bicycle parking spaces, within the Downtown District of the DNCP. The project is consistent with the DNCP as it supports the plan's overarching objective to manage parking as an integrated system serving Downtown residents, employees, and visitors. The project directly advances Goal 3.5 and Policies 3.5.1, 3.5.2, and 3.5.5 by consolidating parking supply into a shared facility that serves both residential and commercial uses, thereby reducing reliance on a parcel-by-parcel parking provision and supporting a "park once" strategy. By replacing an existing surface parking lot with a leveled parking structure, the project contributes to more efficient land use development and supports the DNCP's vision of reducing excess surface parking while enabling higher-intensity infill development elsewhere in the Downtown District. The provision of 47 bicycle parking spaces is also consistent with Policy 3.6.4, supporting multimodal access to key destinations within Downtown.

The project does not include ground-floor tenant space or active uses along the street frontage as encouraged by Policy 2.4.2. However, this policy is one of several design-oriented provisions within the DNCP and must be considered in the context of the plan as a whole. The project site is currently developed as a surface parking lot and is located along a limited frontage adjacent to the Union Pacific Railroad, where pedestrian activity is constrained. In this context, the project's primary function as a shared parking facility supports the DNCP's core parking management objectives by providing centralized parking infrastructure necessary to serve surrounding uses and facilitate future

[19] City of Fresno. 2016. *Downtown Neighborhoods Community Plan. Chapter 3: Transportation. E. Goals and Policies.* Page 3:19. Website: https://www.fresno.gov/wp-content/uploads/2023/04/161020DNCPFinallowres1.pdf (accessed March 20, 2026).

mixed-use development. Additionally, the project incorporates pedestrian improvements, landscaping, and bicycle parking consistent with the plan's broader goals for accessibility and public realm enhancement.

Overall, the project is consistent with the DNCP because it advances the plan's primary goals related to integrated parking management, shared parking supply, and support for Downtown revitalization, while addressing an existing condition of underutilized surface parking and enabling future infill development consistent with the plan's long-term vision.

City of Fresno General Plan. The City of Fresno General Plan, adopted in 2014, designates the project site as Downtown Core, which is identified as the cultural, civic, commercial, and transit center of the City and the broader region.[20] This designation is intended to accommodate a mix of commercial, retail, multi-family residential, office, civic, and lodging uses in a compact, urban form. The General Plan emphasizes infill development within the Downtown Core, with no maximum floor area ratio and building heights of up to 15 stories, to support a revitalized and active central area.[21] General Plan objectives and policies that apply to the proposed project are:

- **Policy Land Use (LU)3-c:** Encourage adoption of supportive zoning regulations for compact development along BRT corridors leading to the Downtown Core that will not diminish the long-term growth and development potential for Downtown.
    - **Objective UF-10:** Calibrate parking according to the Downtown's parking needs and make it efficient and easy to find.
- **Policy UF-12-f:** Adopt a new Development Code which includes use regulations and standards to allow for mixed-uses and shared parking facilities.
- **Policy UF-12-h:** Explore opportunities to provide shared parking within mixed-use designations to reduce the need to construct large parking lots or structures needed for peak use times only.
- **Policy Design (D)-1-g:** Consider adopting and implementing incentives to replace existing large surface parking lots in centers with parking structures, and to incorporate them into high-density mixed-use developments.
- **Policy D-1-i:** Consider requiring new development of above-grade parking structures to be wrapped with and provide direct access to active uses, such as dwelling units, offices, and shopping spaces.

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20 City of Fresno. 2014. *FRESNO General Plan. General Plan Land Use and Circulation Map*. Website: https://www.fresno.gov/wp-content/uploads/2023/03/Official-General-Plan-Land-Use_20220411-1.pdf (accessed March 19, 2026).

21 City of Fresno. 2014. *FRESNO General Plan.* Pages 3-3, 3-15, 3-17, 3-18, 3-36, 3-43, 3-50, 3-61. Website: https://www.fresno.gov/wp-content/uploads/2023/03/upload_temp_Consolidated-GP-10-13-2022_compressed.pdf (accessed March 19, 2026).

  - Commentary: If active uses are not feasible on the ground floor of parking garages, frontages should be architecturally attractive. This may be accomplished by including unique designs and materials, such as glass, articulated masonry, murals or landscaping setbacks.

- **Policy Mobility and Transportation (MT)-4-h Bicycle Parking Facilities:** Promote the installation of bicycle locking racks and bicycle parking facilities at public buildings, transit facilities, public and private parking lots, and recreational facilities. Establish standards for bicycle parking in the Development Code.

- **Policy MT-8-d:** Plan, design, and implement transportation system improvements promoting coordination and continuity of transportation modes and facilities, such as shared parking or park and ride facilities at Activity Centers.

  - **Objective MT-10:** Establish parking standards that are strategically tuned to support neighborhoods, shopping districts and employment centers that have a complete range of transportation choices.

- **Policy MT-10-a:** Update off-street parking standards to reflect the context and location within activity areas of multiple uses and reductions appropriate for mixed residential and non-residential uses and proximity to existing or planned transit service.

- **Policy MT-10-b:** Establish a strategy to promote the sharing of excess parking between uses within Activity Centers and BRT corridors, including specific provisions for this in the Development Code.

The proposed project is consistent with the General Plan as it implements key policies related to infill development, parking management, and Downtown revitalization. The project supports Policy LU-3-c by facilitating development within the Downtown Core, where growth is intended to be concentrated. The replacement of an existing surface parking lot with a structured parking facility is directly aligned with Policy D-1-g, which encourages the transition from surface parking to structured parking to support more intensive land use patterns. The project also advances Objective UF-10 and Policies UF-12-f and UF-12-h by providing a centralized, shared parking resource that serves both residential and commercial uses, thereby reducing the need for individual on-site parking and supporting a more efficient parking system. Consistent with Objective MT-10 and Policies MT-10-a and MT-10-b, the project contributes to a coordinated parking strategy within a multi-use activity center. The inclusion of 47 bicycle parking spaces is consistent with Policy MT-4-h, which promotes the installation of bicycle parking facilities to support multimodal transportation. The proposed project also supports future residential infill development in the Downtown Core as described in General Plan Objective UF-12 by providing centralized parking infrastructure necessary to accommodate higher-density development. Additionally, the project incorporates design features, including the use of unique materials along the western edge of the parking structure, as well as landscaping and streetscape improvements, which support General Plan direction to enhance the pedestrian environment and urban design quality.

The project does not fully implement Policy D-1-i, which encourages above-grade parking structures to be wrapped with active uses such as residential, office, or commercial space. The proposed

project consists solely of parking and does not include other ground-floor uses. However, the General Plan provides flexibility where active uses are not feasible and instead emphasizes the importance of architectural treatment and visual quality.[22] In this case, the project incorporates aesthetic design elements and landscaping to improve the building's interface with the surrounding environment. Overall, the project is consistent with the General Plan's broader goals and policies by supporting infill development, consolidating parking as a shared resource, reducing reliance on surface parking, and contributing to the long-term functionality and revitalization of the Downtown Core.

Summary. Since the project consists of a structured parking facility within the Downtown Core designation and DTC zoning district, where parking is a permitted use, and is located within an area planned for infill development and centralized parking management, the project is consistent with the FCSP, Citywide Development Code, the DNCP, and the City of Fresno General Plan. The project replaces an existing surface parking lot with a seven-level parking structure that supports shared parking, a "park once" strategy, and future infill development, consistent with applicable goals and policies related to efficient land use, parking consolidation, and Downtown revitalization. While the project does not include ground-floor active uses as encouraged by certain design-oriented policies and standards, it incorporates streetscape improvements, landscaping, bicycle parking (47 spaces), and architectural treatments, including the use of unique materials to enhance the public interface. Additionally, the project will be subject to applicable development standards and conditions of approval to ensure consistency with the Citywide Development Code and applicable plans. Therefore, the project is consistent with the applicable land use designations, policies, and regulations, and meets the requirements of Section 15332(a) of the *State CEQA Guidelines.*

(b) The proposed development occurs within City limits on a project site of no more than five acres substantially surrounded by urban uses.

The project is proposed on a site of approximately 2.26 acres within the City of Fresno 467-040-43ST, formerly 467-040-20S and 467-040-22S) and is bounded by an internal driveway connecting to Inyo Street, H Street, Mono Street, and the Union Pacific Railroad. Surrounding land uses include Chukchansi Park to the north; surface parking with solar carports to the northwest; a dirt lot to the northeast; the Union Pacific Railroad to the south, southwest, and southeast; and commercial uses to southeast. As shown in Figure 2, the 2.26-acre project site is substantially surrounded by urban uses and is therefore consistent with Section 15332(b) of the *State CEQA Guidelines.*

(c) The project site has no value as habitat for endangered, rare, or threatened species.

The project site is in downtown Fresno and entirely developed as a paved parking lot. Vegetation on-site is limited to landscaped trees and shrubs along the perimeter and weedy plants in unmaintained areas. A railroad corridor is present along the southern boundary of the project site. Parking lots and buildings are present to the north and south. Undeveloped lots are present to the east; these lots

[22] City of Fresno. 2014. *FRESNO General Plan.* Page 3-61. Website: https://www.fresno.gov/wp-content/uploads/2023/03/upload_temp_Consolidated-GP-10-13-2022_compressed.pdf (accessed March 19, 2026).

were previously occupied by buildings and parking lots that have been demolished in the previous five years.[23]

The Biological Resources Review (Attachment A) prepared for the project site included a literature review and field survey to determine the existence or potential occurrence of endangered, rare, or threatened plant and animal species and critical habitats on or in the vicinity of the site. A query of the California Department of Fish and Wildlife California Natural Diversity Database[24] and Biogeographic Information and Observation System,[25] California Native Plant Society Inventory of Rare and Endangered Plants,[26] and the United States Fish and Wildlife Service Information for Planning and Consultation[27] system identified several endangered, threatened, or rare plant or animal species known or with potential to occur in the project vicinity. The results of the database query are included in Table A.

The results of the database searches were field verified through a pedestrian survey focused on the project site plus a 100-foot buffer (study area) during a site visit on March 18, 2026 (refer to Attachment A). No plant or wildlife species listed as special-status, endangered, rare, or threatened were observed on the project site, and none are expected to occur due to the site's developed nature, relatively small size, and isolation from open space with suitable habitat to support these species.

Potential impacts to native nesting bird species could occur if the trees on-site are removed during the nesting season (February 1 to September 30). Impacts to active nests could occur by direct destruction of nests during construction and/or by disturbance from noise and vibration caused by construction activities which could lead to abandonment of nests and nestlings. Implementation of the following avoidance and minimization measure (Nesting Bird Surveys) would result in a less than significant impact.

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23 Google LLC. 2026. Google Earth Pro.

24 California Department of Fish and Wildlife (CDFW). 2026a. California Natural Diversity Database (CNDDB) – Commercial version dated March 3, 2026. Website: https://map.dfg.ca.gov/rarefind/view/RareFind.aspx (accessed March 2026).

25 California Department of Fish and Wildlife (CDFW). 2026b. Biogeographic Information and Observation System (BIOS). Website: www.wildlife.ca.gov/data/BIOS (accessed March 2026).

26 California Native Plant Society (CNPS). 2026. Inventory of Rare and Endangered Plants. V.7-08c-Interim 8-22-02. Website: www.rareplants.cnps.org (accessed March 2026).

27 United States Fish and Wildlife Service (USFWS). 2026. Information for Planning and Consultation online Project planning tool. Website: https://ecos.fws.gov/ipac/ (accessed March 2026).

Table A: Special-Status Species Summary

Scientific Name Common Name	Status	Habitat Requirements	Potential to Occur	Rationale
Plants				
Caulanthus californicus California jewelflower	US: E CA: E CRPR: 1B.1	Annual herb; blooms February-May; chenopod scrub, pinyon and juniper woodland, valley and foothill grassland.	No	No suitable habitat
Castilleja campestris var. *succulenta* succulent owl's clover	US: T CA: — CRPR: 1B.2	Annual herb (hemiparasitic); blooms (March) April-May; vernal pools (often acidic).	No	No suitable habitat
Imperata brevifolia California satintail	US: — CA: — CRPR: 2B.1	Perennial rhizomatous herb; blooms September-May; chaparral, coastal scrub, meadows and seeps (often alkali), Mojavean desert scrub, riparian scrub.	No	No suitable habitat
Leptosiphon serrulatus Madera leptosiphon	US: — CA: — CRPR: 1B.2	Annual herb; blooms April-May; cismontane woodland, lower montane coniferous forest.	No	No suitable habitat
Sagittaria sanfordii Sanford's arrowhead	US: — CA: — CRPR: 1B.2	Perennial rhizomatous herb (emergent); blooms May-October (November); marshes and swamps (shallow freshwater).	No	No suitable habitat
Orcuttia inaequalis San Joaquin Valley Orcutt grass	US: T CA: E CRPR: 1B.1	Annual herb; blooms April-September; vernal pools.	No	No suitable habitat
Tuctoria greenei Greene's tuctoria	US: E CA: R CRPR: 1B.1	Annual herb; blooms May-July (September); vernal pools.	No	No suitable habitat
Invertebrates				
Branchinecta lynchi vernal pool fairy shrimp	US: T CA: —	Occur in a variety of vernal pool habitats that range from small, clear pools to large, turbid, and alkaline pools.	No	No suitable habitat
Amphibians				
Ambystoma californiense pop. 1 California tiger salamander—Central California DPS	US: T CA: T	Small salamander found in vernal and seasonal pools and associated grasslands, oak savanna and woodland, and coastal scrub in the Central Valley and along the Central Coast.	No	No suitable habitat

Table A: Special-Status Species Summary

Scientific Name Common Name	Status	Habitat Requirements	Potential to Occur	Rationale
Spea hammondii western spadefoot	US: PT CA: SSC	Species relies on vernal pools for breeding where predators cannot become established and open areas with sand or gravelly soils in a variety of habitats: grasslands, coastal scrub, woodlands, chaparral, sandy washes, lowland river floodplains, alkali flats, foothills, and mountains.	No	No suitable habitat
Reptiles				
Anniella pulchra northern California legless lizard	US: — CA: SSC	Secretive fossorial lizard found in many habitats, especially valley and foothill grassland, chaparral, coastal scrub, and coastal dune; most commonly associated with moist sandy or loose organic soils with leaf litter.	No	No suitable habitat
Arizona elegans occidentalis California glossy snake	US: — CA: SSC	Scrub and grassland habitats, often with loose or sandy soils.	No	No suitable habitat
Gambelia silus [=sila] blunt-nosed leopard lizard	US: E CA: E, FP	Occurs in semiarid habitats within the southern Central Valley and Cuyama Valley; habitats typically are flat and have large open areas with scattered shrubs for refuge; uses small mammal burrows for shelter.	No	No suitable habitat
Phrynosoma blainvillii coast horned lizard	US: — CA: SSC	Prefers sandy/loose soils in grassland, forests, woodlands, and open chaparral.	No	No suitable habitat
Actinemys marmorata northwestern pond turtle	US: PT CA: SSC	Highly aquatic and diurnally active; found in ponds, lakes, rivers, streams, creeks, marshes, and irrigation ditches with vegetation and rocky/muddy bottom.	No	No suitable habitat
Birds				
Buteo swainsoni Swainson's hawk	US: — CA: T	Breeds in stands with few trees in juniper-sage flats, riparian areas, and oak savannahs, and along freeways; usually nests in scattered trees surrounded by foraging habitat; forages primarily for small mammals in grasslands and open desert scrublands or suitable grain fields or livestock pastures.	No	No suitable habitat
Mammals				
Dipodomys nitratoides exilis Fresno kangaroo rat	US: E CA: E	Occurs on alkali open grassland on bare alkaline clay-based soils; likely extirpated.	No	No suitable habitat
Antrozous pallidus pallid bat	US: — CA: SSC	Occurs in low elevations in deserts, grasslands, shrublands, woodlands, and forests; day roosts in caves, crevices, mines, and occasionally hollow trees and buildings; night roosts sometimes in more open areas.	No	No suitable habitat

Table A: Special-Status Species Summary

Scientific Name Common Name	Status	Habitat Requirements	Potential to Occur	Rationale
Eumops perotis californicus western mastiff bat	US: — CA: SSC	Found in conifer and deciduous woodlands, coastal scrub, annual and perennial grassland, desert scrub, chaparral, palm oases, and urban habitats; roosts in crevices on cliff faces, high buildings, trees, and tunnels; needs vertical faces to drop off to take flight.	No	No suitable habitat
Vulpes macrotis mutica San Joaquin kit fox	US: E CA: T	Arid to semi-arid grasslands, open shrublands, savannahs, and grazed lands with loose-textured soils; highly adaptable and documented in urban developed areas; uses burrows year-round for shelter, escape from predators, and rearing young; will use man-made structures.	No	No suitable habitat

Sources: CDFW 2026a; CDFW 2026b; CNPS 2026; LSA 2026; USFWS 2026b; Zeiner et al. 1990[28].

Notes:

Status

E Listed as endangered
T Listed as threatened
PT Proposed Threatened
FP California Fully Protected
SSC California Species of Special Concern

CRPR: California Rare Plant Rank

1A Presumed Extinct in California
1B Rare, Threatened, or Endangered in California and elsewhere
2A Plants presumed extirpated in California, but more common elsewhere
2B Plants Rare, Threatened, or Endangered in California, but more common elsewhere

CRPR Threat Code Extension

.1 Seriously endangered in California (over 80% of occurrences threatened / high degree and immediacy of threat)
.2 Fairly endangered in California (20–80% occurrences threatened)
.3 Not very endangered in California (<20% of occurrences threatened)

CA = California
CDFW = California Department of Fish and Wildlife
CNPS = California Native Plant Society
DPS = Distinct Population Segment
US = United States
USFWS = United States Fish and Wildlife Service

[28] Zeiner, D., W.F. Laudenslayer, Jr., and K.E. Mayer. 1990. California's Wildlife. California Statewide Wildlife Habitat Relationship System, Volumes I, II, & III, with online updates. California Department of Fish and Wildlife. May.

Nesting Bird Surveys. If project activities must occur during the nesting season (February 1 to September 30), pre-activity nesting bird surveys will be conducted no more than seven (7) days prior to the start of construction at the construction site plus a 100-foot buffer. If no active nests are found, no further action is required; however, note that nests may become active at any time throughout the summer, including when construction activities are occurring. If active nests are found during the survey or at any time during project construction, an avoidance buffer will be established by a qualified biologist. The avoidance buffer will remain in place until the biologist has determined that the young are no longer reliant on the nest. Work may occur within the avoidance buffer under the approval and guidance of the biologist. The biologist will have the ability to stop construction if nesting adults show signs of distress. The results of the pre-activity survey, and monitoring if necessary, will be summarized in a brief memo report submitted to the City of Fresno.

(d) Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.

Traffic. A Trip Generation Analysis and Vehicle Miles Traveled (VMT) Screening Analysis Memorandum (Attachment B) was prepared to assess the impacts of traffic generated by the proposed project on the surrounding transportation network. The proposed project includes development of a 294,118-square-foot, seven-level open-air parking structure with 904 parking spaces (including 147 spaces for a future multifamily residential project, 757 spaces for commercial use, and 47 bicycle parking spaces) located at the southwest corner of H Street and Mono Street. Vehicular access to the site would be provided via two full-access driveways from Inyo Street/H Street and Mono Street, and the project would include installation of all-way stop control at the H Street/Mono Street intersection.

The requirement for a Traffic Impact Study (TIS) or Level of Service (LOS) analysis is established by the City of Fresno General Plan Mobility and Circulation Element, specifically Policy MT-2-I, which identifies thresholds based on Traffic Impact Zones (TIZ) and peak-hour trip generation.[29] The proposed project is located within TIZ I of the City's Mobility and Circulation Policy MT-2-I. TIZ I represents the Downtown Planning Area, and prescribes the requirement of preparation of a TIS or LOS analysis. According to the policy, a project would be required to maintain a peak hour LOS standard of F and better for intersections and roadway segments, and generate lower than 200 peak hour trips to not require the preparation of a TIS. It is acknowledged in the City's General Plan that the LOS within the Downtown Planning Area could deteriorate to LOS F.

As previously stated, the proposed project includes the development of a parking structure with 904 parking stalls. The purpose of the project would be to provide a consolidated vehicle parking facility for patrons coming to the Chukchansi Park stadium, or other downtown business and administration offices. Currently, these existing and future projects in the vicinity lack adequate parking facilities, and the proposed project would alleviate constraints on parking capacity by providing an additional parking facility dedicated to patrons travelling to downtown Fresno. As such, the project would not include any land uses that could be considered as a stand-alone trip generator, and the project

[29] City of Fresno. 2014. *FRESNO General Plan*. Website: https://www.fresno.gov/planning/general-plan-development-code/#general-plan(accessed April 2026).

would support multiple existing and planned development land uses identified in the vicinity as part of the Fulton Corridor Specific Plan. Therefore, the proposed project would consolidate the existing inbound and outbound patron trips for the land uses in the vicinity from other places, and streetside or surface parking to this dedicated parking facility.

Although the proposed project is not estimated to generate any new patron trips, as a conservative estimate it could be assumed that the project would generate two trips per day for maintenance and garbage collection purposes, which usually occur during off-peak hours. As such, it could be estimated that the project would generate four (4) new daily trips (two inbound and two outbound), and no new a.m. or p.m. peak hour trips. Therefore, the project would generate less than the 200 peak hour trip threshold requirement for the preparation of a TIS or detailed LOS analysis for a project within TIZ I, and no further LOS analysis is required.

The City of Fresno adopted CEQA Guidelines for VMT Thresholds on June 25, 2020, pursuant to Senate Bill (SB) 743, which became effective July 1, 2020.[30] The City of Fresno VMT Thresholds were developed in accordance with *State CEQA Guidelines* Sections 15064.3 and 15064.7 and informed by the December 2018 *Technical Advisory on Evaluating Transportation Impacts in CEQA* prepared by the California Governor's Office of Planning and Research (OPR).[31] However, in July of 2025, the County of Fresno updated the Fresno County SB 743 Implementation Regional Guidelines (Fresno COG Guidelines), which the City currently follows. According to the Fresno COG Guidelines, projects generating fewer than 500 daily vehicle trips may be screened out from detailed VMT analysis.[32] The proposed project is estimated to generate a nominal number of daily trips (up to four daily trips) and therefore qualifies as a small project eligible for screening. Additionally, the installation of all-way stop control at the H Street/Mono Street intersection is considered a transportation system improvement that does not add vehicle capacity and is also eligible for screening under the VMT Guidelines. As such, the project would not cause a substantial increase in VMT and can be screened out from further VMT analysis.

The proposed project would not conflict with applicable transportation policies or programs and would not generate a substantial increase in vehicle trips in accordance with the City's TIA Guidelines for VMT and Level of Service Assessment. Therefore, the project would not result in any significant effects relating to traffic pursuant to Section 15332(d) of the *State CEQA Guidelines*.

Noise. The project is located in the City of Fresno and therefore subject to compliance with the City's Noise Element of the General Plan and Municipal Code. The closest sensitive receptors to the project site are the residences to the southwest, approximately 615 feet from the project boundary.

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30 City of Fresno. 2020. *CEQA Guidelines for Vehicle Miles Traveled Thresholds.* Website: https://www.fresno.gov/wp-content/uploads/2025/11/CEQA-Guidelines-for-Vehicle-Miles-Traveled-Final-Adopted-Version-10w1106.pdf (accessed April 2026).

31 Governor's Office of Land Use and Climate Innovation (LCI) (previously the Governor's Office of Planning and Research [OPR]). 2018. *Technical Advisory on Evaluating Transportation Impacts In CEQA.* December.

32 Fresno Council of Governments (Fresno COG). 2025. *Fresno County SB 743 Implementation Regional Guidelines.* Website: https://www.fresnocog.org/wp-content/uploads/2025/10/Fresno-COG-VMT-Thresholds-June-2025_10072025.pdf (accessed April 2026).

***City of Fresno General Plan*.** The City's General Plan (2014) includes a set of policies (detailed below) and programs that form a blueprint for the physical development of the City. The following policies related to noise and applicable to the proposed project are presented in the Noise Element of the General Plan. In addition, the Noise Element sets noise standards for transportation and stationary noise sources as shown in Table B and Table C, below.

Table B: Transportation (Non-Aircraft) Noise Sources

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

Source: General Plan (City of Fresno, 2014).

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

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

CNEL = Community Noise Equivalent Level

dB = decibels

L_{dn} = day-night average noise level

Table C: Stationary Noise Sources

	Daytime (7:00 a.m. – 10:00 p.m.)	Nighttime (10:00 p.m. to 7:00 a.m.)
Hourly Equivalent Sound Level (L_{eq}), dBA	50	45
Maximum Sound Level (L_{max}), dBA	70	60

Source: General Plan (City of Fresno, 2014).

[1] The Planning and Development Director, on a case-by-case basis, may designate land uses other than those shown in this table to be noise-sensitive, and may require appropriate noise mitigation measures.

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

dB = decibels

dBA = A-weighted decibels

- **Policy NS-1-j: Significance Threshold.** Establish, as a threshold of significance for the City's environmental review process, that a significant increase in ambient noise levels is assumed if the project would increase noise levels in the immediate vicinity by 3 dB L_{dn} or CNEL or more above the ambient noise limits established in this General Plan Update.

- **Policy NS-1-m: Transportation Related Noise Impacts.** For projects subject to City approval, require that the project sponsor mitigate noise created by new transportation and transportation-related stationary noise sources, including roadway improvement projects, so

that resulting noise levels do not exceed the City's adopted standards for noise-sensitive land uses.

- **Policy NS-1-o: Sound Wall Guidelines.** Acoustical studies and noise mitigation measures for projects shall specify the heights, materials, and design for sound walls and other noise barriers. Aesthetic considerations shall also be addressed in these studies and mitigation measures such as variable noise barrier heights, a combination of a landscaped berm with wall, and reduced barrier height in combination with increased distance or elevation differences between noise source and noise receptor, with a maximum allowable height of 15 feet. The City will develop guidelines for aesthetic design measures of sound walls, and may commission area wide noise mitigation studies that can serve as templates for acoustical treatment that can be applied to similar situations in the urban area.

***City of Fresno Municipal Code*.** Chapter 10, Article 1 (Noise Regulations), of the City Municipal Code (2026) establishes excessive noise guidelines and exemptions. The following portions of the Municipal Code are applicable to the proposed project.

- Section 10-109(a) of the City's Municipal Code (2026) limits construction, repair, or remodeling work accomplished pursuant to a building, electrical, plumbing, mechanical, or other construction permit issued by the City or other governmental agency, or to site preparation and grading to between the hours of 7:00 a.m. and 10:00 p.m. on any day except Sunday.

- Section 10-101 of the City's Municipal Code[33] contains the City's Noise Ordinance, which establishes excessive noise guidelines and exemptions. Standards are set for ambient noise based on district type (residential, commercial, and industrial) and time of day. Assumed, ambient noise levels for noise sensitive residential uses during daytime, evening, and nighttime hours are 60 dBA L_{eq}, 55 dBA L_{eq}, and 55 dBA L_{eq}, respectively.

- Section 15-2507 of the City's Municipal Code (2026) states that no vibration shall be produced that is transmitted through the ground and is discernible without the aid of instruments by a reasonable person at the lot lines of the site. Vibrations from temporary construction, demolition, and vehicles that enter and leave the subject parcel (construction equipment, trains, trucks, etc.) are exempt from this standard.

***Federal Transit Administration Vibration Criteria*.** Vibration standards included in the Federal Transit Administration's (FTA) 2018 *Transit Noise and Vibration Impact Assessment Manual* (FTA Manual)[34] are used in this analysis for ground-borne vibration impacts on human annoyance. The criteria for environmental impact from ground-borne vibration and noise are based on the maximum levels for a single event. The criteria for assessing the potential for interference or

[33] City of Fresno. 2019. *Fresno, California – Code of Ordinances*. May 21.

[34] Federal Transit Administration (FTA). 2018. *Transit Noise and Vibration Impact Assessment Manual.* Office of Planning and Environment. Report No. 0123. September.

annoyance from vibration levels in a residential building during daytime hours is 80 vibration velocity decibels (VdB).

Ambient Noise in the Project Vicinity. The primary existing noise sources in the project area are from traffic on H Street and Mono Street. To assess the existing noise conditions in the area, long-term noise measurements were conducted at the project site. Two long-term, 24-hour measurements were taken from March 11, 2026, to March 12, 2026. The locations of the noise measurements are shown on Figure 3 of the Noise and Vibration Impact Technical Memorandum (Attachment C), and the results are summarized in Table H of Attachment C. The results on the noise monitoring indicate that average daytime and nighttime hourly levels are higher than the City's assumed ambient levels.

Temporary (Construction) Noise. Two types of short-term construction noise would occur during project construction. The first type would be from construction crew commutes and the transport of construction equipment and materials to the project site, which would incrementally raise noise levels on roadways leading to the site. Although there would be a relatively high single-event noise exposure potential causing intermittent noise nuisance (passing trucks at 50 feet would generate up to a maximum of 84 A-weighted decibels (dBA) during equipment and material delivery to and from the site for construction preparation, these intermittent high single-event noise exposures would not be significant because trucks already use the roadways leading to the site under current conditions. In addition, the effect on longer-term ambient noise levels would be insignificant because the daily construction-related vehicle trips are few when compared to existing daily traffic volume in the project vicinity.

The results of the California Emissions Estimator Model (CalEEMod), provided in the Air Quality and Greenhouse Gas Emissions Technical Memorandum (Attachment D) for the proposed project, indicate that during the building construction phase, an additional 683 acoustically equivalent trips would occur during an average day from worker and delivery activities. Because the existing traffic volume on these roads are considerably more than 683 vehicles, construction-related vehicle trips would not approach existing daily traffic volume, and traffic noise would not increase by 3 dBA day-night average noise level (L_{dn}). A noise level increase of less than 3 dBA would not be perceptible to the human ear in an outdoor environment. Therefore, there would not be an audible increase from construction crew commutes and the transport of construction equipment and materials to the project site and short-term, construction-related impacts would be less than significant.

The second type of short-term construction noise is related to noise generated from heavy equipment used during construction activities. The project includes demolition, grading, building construction, architectural coating, and paving phases of construction. These various sequential phases change the character of the noise generated on a project site. Therefore, the noise levels vary as construction progresses. Despite the variety in the type and size of construction equipment, similarities in the dominant noise sources and patterns of operation allow construction-related noise ranges to be categorized by work phase. The project construction composite noise levels at a distance of 50 feet would range from 74 dBA L_{eq} to 88 dBA L_{eq}, with the highest noise levels occurring during the demolition phase.

The closest sensitive property line, residences to the southwest from the center of the project site may be subject to short-term construction noise reaching 63 dBA L_{eq} generated by construction activities in the project area. While construction-related short-term noise levels have the potential to be higher than existing ambient noise levels in the project area under existing conditions, the noise impacts would no longer occur once project construction is completed. As stated above, noise impacts associated with construction activities are regulated by the City's Municipal Code. The proposed project would comply with the construction hours specified in the City's Noise Ordinance, which states that construction activities are allowed between the hours of 7:00 a.m. and 10:00 p.m. on any day other than Sundays, where no construction activities are allowed. Given that the construction-related noise levels would remain below the 80 dBA L_{eq} construction noise level criteria and construction would occur during the time periods specified in the City's Municipal Code, construction-related noise impacts would be less than significant.

Permanent (Operational) Noise. Long-term noise would be generated from vehicle traffic entering and exiting the site. Based on the project's Trip Generation Analysis and Vehicle Miles Traveled Screening Analysis Memorandum (Attachment B), the project is anticipated to generate 4 new patron trips. Therefore, the project would not be responsible for any significant trip generation, and the traffic noise increase along the roadways in the vicinity of the project would be less than significant.

Vibration. The greatest levels of vibration are anticipated to occur during the demolition and grading phases, during which large bulldozers, and other heavy-tracked construction equipment (expected to be used for this project) would generate ground-borne vibration of up to 89 vibration root-mean-square (RMS) velocity decibels (VdB) (0.089 peak particle velocity [PPV] inches per second [in/sec]) and 76 VdB (0.076 PPV [in/sec], respectively, when measured at 25 feet from the vibration construction source (Attachment C). All other construction phases are expected to result in lower vibration levels.

The distance to the nearest buildings for vibration damage impact analysis is measured between the nearest off-site buildings and the project construction boundary (assuming the construction equipment would be used at or near the project setback line). For annoyance potential due to vibration impacts, the distance from the center of construction activities to the nearest off-site buildings is utilized. Based on Table L in the Noise and Vibration Impact Technical Memorandum (Attachment C), representative vibration levels are expected to approach 0.0013 in/sec RMS at the closest receptors and would not exceed the annoyance threshold of 0.4 in/sec RMS. Additionally, as shown in Table M (Attachment C), vibration levels are expected to approach 0.018 PPV in/sec at the nearest surrounding structures and would remain below the California Department of Transportation (Caltrans) threshold of 0.5 in/sec PPV for building damage. Vibration levels at all other buildings located further from the project site would be lower. Therefore, construction would not result in any vibration damage, and impacts would be less than significant.

As detailed above, the project would not result in the generation of a substantial temporary or permanent increase in ambient noise or vibration levels in the vicinity of the project in excess of

applicable standards. Therefore, the project would not result in any significant effects related to noise pursuant to Section 15332(d) of the *State CEQA Guidelines*.

Air Quality. The project site is in the San Joaquin Valley Air Basin (SJVAB). Air quality in the SJVAB is under the jurisdiction of the San Joaquin Valley Air Pollution Control District (SJVAPCD). This analysis was prepared using methods and assumptions recommended in the SJVAPCD's *Guidance for Assessing and Mitigating Air Quality Impacts* (GAMAQI).[35]

CalEEMod Version 2022.1. was used to calculate emissions from construction and operation of the proposed project. Please refer to the Air Quality and Greenhouse Gas Emissions Technical Memorandum for a detailed description of emissions modeling methodology and assumptions (see Attachment D).

Consistency with Applicable Air Quality Plans. An air quality plan describes air pollution control strategies to be implemented by a city, county, or region classified as a nonattainment area. The main purpose of the air quality plan is to bring the area into compliance with the requirements of the federal and State air quality standards.

The SJVAPCD has different air quality plans to address pollutants for which the region is in non-attainment or in maintenance. The SJVAPCD adopted the *2022 Plan for the 2015 8-hour Ozone Standard* in December 2022 to satisfy Clean Air Act requirements and plan for regional attainment of the 70 parts per billion (ppb) 8-hour ozone standard.[36] To assure the SJVAB's continued attainment of the United States Environmental Protection Agency (USEPA) PM_{10} standard, the SJVAPCD adopted the *2007 PM_{10} Maintenance Plan* in September 2007. In addition, the SJVAPCD adopted the *2024 Plan for the 2012 $PM_{2.5}$ Standard,* which addresses compliance with the federal annual $PM_{2.5}$ standard of 12 micrograms per cubic meter ($\mu g/m^3$) by 2030.[37]

For a project to be consistent with SJVAPCD air quality plans, the pollutants emitted from a project should not exceed the SJVAPCD emission thresholds or cause a significant impact on air quality. As discussed below, construction of the proposed project would not result in the generation of criteria air pollutants that would exceed SJVAPCD thresholds of significance. In addition, long-term operational emissions associated with the proposed project, including area, energy, and mobile source emissions, would not exceed the thresholds that were developed to help the SJVAB achieve attainment of the National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS). Therefore, the proposed project would not

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35 San Joaquin Valley Air Pollution Control District (SJVAPCD). 2015. *Guidance for Assessing and Mitigating Air Quality Impacts*. March 19. Website: https://www.valleyair.org/media/g4nl3p0g/gamaqi.pdf (accessed April 2026).

36 San Joaquin Valley Air Pollution Control District (SJVAPCD). *2022 Plan for the 2015 8-Hour Ozone Standard*. December 15. Website: https://ww2.valleyair.org/media/q55posm0/0000-2022-plan-for-the-2015-8-hour-ozone-standard.pdf (accessed April 2026).

37 San Joaquin Valley Air Pollution Control District (SJVAPCD). *2024 Plan for the 2012 Annual $PM_{2.5}$ Standard*. June 20. Website: https://ww2.valleyair.org/media/gw5bacvj/2024-pm25-plan.pdf (accessed April 2026).

conflict or obstruct implementation of applicable air quality plans, and the impact would be less than significant.

Criteria Pollutant Analysis. The SJVAB is currently designated as nonattainment for the federal and State standards for O_3 and $PM_{2.5}$. In addition, the SJVAB is in nonattainment for the PM_{10} standard. In developing thresholds of significance for air pollutants, the SJVAPCD considered the emission levels for which a project's individual emissions would be cumulatively considerable. If a project exceeds the identified significance thresholds, its emissions would be cumulatively considerable, resulting in significant adverse air quality impacts to the region's existing air quality conditions.

Construction Emissions. During construction, short-term degradation of air quality may occur due to the release of particulate emissions generated by grading, paving, building, and other activities. Emissions from construction equipment are also anticipated and would include CO, NO_x, reactive organic gas (ROG), directly emitted particulate matter ($PM_{2.5}$ and PM_{10}), and TACs such as diesel exhaust particulate matter.

Construction activities associated with the proposed project would include site preparation, grading, paving, and building activities. Construction-related effects on air quality from the proposed project would be greatest during the site preparation phase due to the disturbance of soils. If not properly controlled, these activities would temporarily generate particulate emissions. Sources of fugitive dust would include disturbed soils at the construction site. Unless properly controlled, vehicles leaving the site would deposit dirt and mud on local streets, which could be an additional source of airborne dust after it dries. PM_{10} emissions would vary from day to day, depending on the nature and magnitude of construction activity and local weather conditions. PM_{10} emissions would depend on soil moisture, silt content of soil, wind speed, and the amount of operating equipment. Larger dust particles would settle near the source, while fine particles would be dispersed over greater distances from the construction site.

Water or other soil stabilizers can be used to control dust, resulting in emission reductions of 50 percent or more. The SJVAPCD has implemented Regulation VIII measures for reducing fugitive dust emissions (PM_{10}). With the implementation of Regulation VIII measures, fugitive dust emissions from construction activities would not result in adverse air quality impacts.

In addition to dust-related PM_{10} emissions, heavy trucks and construction equipment powered by gasoline and diesel engines would generate CO, SO_2, NO_x, ROG, and some soot particulate ($PM_{2.5}$ and PM_{10}) in exhaust emissions. If construction activities were to increase traffic congestion in the area, CO and other emissions from traffic would increase slightly while those vehicles idle in traffic. These emissions would be temporary in nature and limited to the immediate area surrounding the construction site.

Construction emissions were estimated for the project using CalEEMod and are summarized in Table D below.

Table D: Project Construction Emissions

Construction Year	Pollutant Emissions (Tons per Year)					
	ROG	NO_x	CO	SO_X	PM_{10}	$PM_{2.5}$
2026	0.12	0.88	1.10	<0.01	0.13	0.06
2027	0.19	1.12	1.58	<0.01	0.13	0.05
SJVAPCD Threshold	**10.0**	**10.0**	**100.0**	**27.0**	**15.0**	**15.0**
Significant?	**No**	**No**	**No**	**No**	**No**	**No**

Source: Compiled by LSA (April 2026).
CO = carbon monoxide
NO_x = nitrogen oxides
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
PM_{10} = particulate matter less than 10 microns in size
ROG = reactive organic gas
SJVAPCD = San Joaquin Valley Air Pollution Control District
SO_x = sulfur oxides

As shown in Table D, construction emissions associated with the proposed project would not exceed the SJVAPCD's thresholds for ROG, NO_x, CO, SO_x, PM_{10}, and $PM_{2.5}$ emissions.

In addition, if the proposed project is determined to be subject to SJVAPCD Rule 9510 (Indirect Source Review [ISR]), the City would be required to comply with applicable ISR requirements, which may include implementation of emission reduction measures or payment of applicable ISR fees to further reduce regional NO_x and PM_{10} emissions. Separately, compliance with SJVAPCD Regulation VIII fugitive dust control requirements during construction would minimize locations PM_{10} emissions. Implementation of Regulatory Compliance Measure (RCM) AIR-1 would ensure that the proposed project complies with Regulation VIII.

RCM AIR-1 Consistent with San Joaquin Valley Air Pollution Control District (SJVAPCD) Regulation VIII (Fugitive PM_{10} Prohibitions), the following controls are required to be included as specifications for the proposed project and implemented at the construction site:

- All disturbed areas, including storage piles, which are not being actively utilized for construction purposes, shall be effectively stabilized of dust emissions using water or chemical stabilizer/suppressant or covered with a tarp or other suitable cover or vegetative ground cover.
- All on-site unpaved roads and off-site unpaved access roads shall be effectively stabilized of dust emissions using water or chemical stabilizer/suppressant.
- All land clearing, grubbing, scraping, excavation, land leveling, grading, and cut and fill activities shall be effectively controlled of fugitive dust emissions utilizing application of water or by presoaking.
- When materials are transported off site, all material shall be covered, or effectively wetted to limit visible dust emissions, and at least 6 inches of freeboard space from the top of the container shall be maintained.

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

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

Construction emissions associated with the proposed project would remain less than significant with adherence to RCM AIR-1, and a significant impact relating to air quality would not occur.

Operational Emissions. Long-term air pollutant emissions associated with operation of the proposed project include emissions from area, energy, and mobile sources. Area-source emissions include architectural coatings, consumer products, and landscaping. Energy-source emissions result from activities in buildings that use natural gas. Mobile-source emissions are from vehicle trips associated with operation of the project. Mobile source emissions include ROG and NO_X emissions that contribute to the formation of ozone. Additionally, PM_{10} emissions result from running exhaust, tire and brake wear, and the entrainment of dust into the atmosphere from vehicles traveling on paved roadways.

Long-term operational emissions associated with the proposed project were calculated using CalEEMod. Table E provides the proposed project's estimated operational emissions.

Table E: Project Operational Emissions

Emission Type	Pollutant Emissions (Tons per Year)					
	ROG	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Mobile Sources	0.00	0.00	0.02	0.00	0.00	0.00
Area Sources	0.24	0.01	1.42	0.00	0.00	0.00
Energy Sources	0.00	0.00	0.00	0.00	0.00	0.00
Stationary Sources	0.02	0.05	0.04	0.00	0.00	0.00
Total Project Emissions	**0.25**	**0.06**	**1.47**	**0.00**	**0.01**	**0.01**
SJVAPCD Threshold	10.0	10.0	100.0	27.0	15.0	15.0
Exceeds Threshold?	**No**	**Yes**	**No**	**No**	**No**	**No**

Source: Compiled by LSA (April 2026).
Note: Some values may not appear to add correctly due to rounding.
CO = carbon monoxide
NO_x = nitrogen oxides
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
PM_{10} = particulate matter less than 10 microns in size
ROG = reactive organic gas
SJVAPCD = San Joaquin Valley Air Pollution Control District
SO_X = sulfur oxides

As shown in Table E, long-term operational emissions associated with the proposed project would not exceed the applicable thresholds of significance for annual ROG, NO_X, CO, SO_X,

PM_{10}, or $PM_{2.5}$ emissions. In addition, if the proposed project is determined to be subject to SJVAPCD Rule 9510, Indirect Source Review, the City would be required to comply with applicable ISR requirements, which may include implementation of emission reduction measures or payment of applicable ISR fees to address regional NO_X and PM_{10} emissions. Compliance with Rule 9510 may further reduce regional NO_X and PM_{10} emissions beyond those conservatively estimated in Table E, above. In conclusion, long-term operational criteria pollutant emissions associated with the proposed project would be less than significant, and significant impact related to air quality would not occur.

***Long Term Microscale (CO Hot Spot) Analysis*.** Localized air quality impacts can occur when emissions from vehicular traffic increase as a result of the proposed project. The primary mobile-source pollutant of local concern is CO, a direct function of vehicle idling time and, thus, of traffic flow conditions. CO transport is extremely limited; under normal meteorological conditions, it disperses rapidly with distance from the source. However, under certain extreme meteorological conditions, CO concentrations near a congested roadway or intersection may reach unhealthful levels, thereby affecting local sensitive receptors (e.g., residents, schoolchildren, the elderly, and hospital patients). Typically, high CO concentrations are associated with roadways or intersections operating at unacceptable levels of service or with extremely high traffic volumes.

SJVAPCD does not provide screening thresholds for localized CO impacts based on traffic volumes. However, the Bay Area Air District provides general screening guidance that a less than significant localized CO impact is expected if project traffic would not increase traffic volumes at affected intersections to more than 44,000 vehicles per hour; or a project would not increase traffic volumes at affected intersections to more than 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited (e.g., tunnel, parking garage, bridge underpass, natural or urban street canyon, or below-grade roadway).[38]

The proposed project is expected to generate 4 average daily trips, with 0 trips occurring during peak hours.[39] As described in the Trip Generation Analysis and Vehicle Miles Traveled Screening Analysis Memorandum (Attachment B), the proposed project meets the criteria for a Small Project, which is defined as a project generating less than 500 daily trips. Therefore, the proposed project was screened out from a detailed VMT analysis and would result in a less than significant VMT impact. The addition of project-generated trips would not result in peak-hour traffic volumes at intersections in the vicinity of the project site in excess of 44,000 vehicles per hour. In addition, the project site is not located in an area where vertical or horizontal mixing is substantially limited.

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38 Bay Area Air District (Air District). 2022 CEQA Guidelines; Screening Criteria. Website: https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa-guidelines-2022/ceqa-guidelines-chapter-4-screening_final-pdf.pdf?rev=ac551d35a52d479dad475e7d4c57afa6&sc_lang=en (accessed April 2026).

39 LSA Associates, Inc (LSA). 2026. *H-Street Parking Building Project Trip Generation Analysis and Vehicle Miles Traveled Screening Analysis Memorandum* (LSA Project No. CFO2202.10).

Therefore, given the lack of traffic impacts associated with the project, project-related vehicles are not expected to result in CO concentrations exceeding the State or federal CO standards, and a significant impact related to air quality would not occur.

Impacts to Sensitive Receptors. Construction and operations of a land use development project may result in emissions of pollutants that could adversely affect existing sensitive receptors in a project area. The closest sensitive receptors to the project site are the residences to the southwest, approximately 615 feet from the project boundary. The following discussion evaluates potential impact related to emissions of toxic air contaminants, naturally-occurring asbestos, and valley fever spores.

Toxic Air Contaminants. Construction of the proposed project may expose surrounding sensitive receptors to airborne particulates and a small quantity of construction equipment pollutants (i.e., usually diesel-fueled vehicles and equipment). In the *Air Quality and Land Use Handbook: A Community Health Perspective*, the California Air Resources Board (CARB) indicates that diesel particulate matter (DPM) concentrations from mobile and stationary sources decrease substantially with distance, with markedly reduced concentrations beyond approximately 500 feet.[40] Because the nearest sensitive receptors are located more than 500 feet from the project site, DPM emissions would be substantially dispersed prior to reaching receptors. Nevertheless, construction contractors would be required to implement SJVAPCD Regulation VIII, as ensured through RCM AIR-1, which would reduce emissions of fugitive dust. In addition, idling of trucks would be limited by the CARB's In-Use Off-Road Diesel Vehicles regulation, which limits idling to 5 minutes or less. Minimizing idling time reduces vehicle exhaust emissions.[41] In addition, according to CARB, DPM emissions have also been shown to be highly dispersive in the atmosphere with the DPM concentration decreasing with distance from the source.[42] Furthermore, the primary construction activities associated with the proposed project would occur over a short timeframe (less than two years) and therefore potential sensitive receptors would be exposed to emissions associated with construction activities for a limited duration. Finally, project construction pollutant emissions would be below the SJVAPCD significance thresholds, which includes thresholds for PM. Overall, construction of the project is not expected to result in the exposure of sensitive receptors to substantial pollutant concentrations.

Once operational, the proposed project would generate very few new vehicle trips and, rather, would provide parking for existing trips in the area. A diesel-fueled emergency generator would be provided on-site, but would only be run during emergency power outages or for standard maintenance and testing. The generator would be subject to permitting through SJVAPCD and would be required to comply with all applicable regulations, including New Source Review (Rule 2201) and any specific limitations on hours

40 California Air Resources Board (CARB). 2005. *Air Quality and Land Use Handbook: A Community Health Perspective*. April. Website: https://ww2.arb.ca.gov/sites/default/files/2023-05/Land%20Use%20Handbook_0.pdf (accessed April 2026).

41 *Ibid.*

42 *Ibid.*

of operations, fuel use, and monitoring and reporting. Compliance with SJVAPCD rules would further limit doses and exposures, reducing potential health risk related to equipment emissions to a level that is not significant. Therefore, operations of the proposed project would not result in new sources of TACs and would not expose sensitive receptors to substantial levels of TACs.

Naturally Occurring Asbestos. The project is located in Fresno County, which is among the counties found to have serpentine and ultramafic rock in their soils.[43] However, according to the California Geological Survey, serpentine and ultramafic rock is not known to occur in the project vicinity.[44] Therefore, the potential risk for naturally occurring asbestos during project construction is not considered significant.

Valley Fever. The closest sensitive receptors are the residences to the southwest, approximately 615 feet from the project boundary. This distance is sufficient in that particulate matter would settle prior to reaching the nearest sensitive receptor. Therefore, any Valley fever spores suspended with the dust would not be anticipated to reach the sensitive receptors. However, during project construction, it is possible that workers could be exposed to Valley fever through fugitive dust. Dust control measures, as ensured by RCM AIR-1 and consistent with SJVAPCD Regulation VIII[45], would reduce the exposure to the workers and sensitive receptors. Therefore, dust from the construction of the project is not anticipated to significantly add to the existing exposure of people to Valley fever.

Odors and Other Emissions. During construction, the various diesel-powered vehicles and equipment in use on site would create localized odors. Construction-related odors are often localized as they are concentrated at the source and dispersed by wind and distance. In addition, construction-related odors are temporary and would cease to occur after construction. Because the project's potential construction-related odor impacts are localized and temporary, they would not adversely affect a substantial number of people. Following construction, the proposed project does not include any common odor-producing land uses. In the event that odor complaints arise, the SJVAPCD has the authority to investigate and enforce compliance under its nuisance rule, Rule 4102, to ensure that any odor complaints are addressed. Therefore, other emissions, such as those leading to odors, adversely affecting a substantial number of people would not occur as a result of the project.

Conclusion. Based on the discussion above, the proposed project would not result in any significant effects related to air quality pursuant to Section 15332(d) of the *State CEQA Guidelines*.

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43 California Department of Conservation (DOC). n.d. California Geological Survey. Asbestos. Website: https://www.conservation.ca.gov/cgs/minerals/mineral-hazards (accessed April 2026).

44 California Department of Conservation (DOC). n.d. California Geological Survey. Naturally-Occurring Asbestos in California. Website: https://www.conservation.ca.gov/cgs/minerals/mineral-hazards/asbestos (accessed April 2026).

45 San Joaquin Valley Air Pollution Control District (SJVAPCD). *2024 Plan for the 2012 Annual $PM_{2.5}$ Standard*. June 20. Website: https://ww2.valleyair.org/media/gw5bacvj/2024-pm25-plan.pdf (accessed April 2026).

Water Quality. Stormwater runoff water quality is regulated by the National Pollutant Discharge Elimination System (NPDES) Program (established through the federal Clean Water Act). The NPDES program's objective is to control and reduce pollutant discharges to surface water bodies. The USEPA delegated the implementation and administration of the NPDES program to the California State Water Resources Control Board (SWRCB). The SWRCB established nine Regional Water Quality Control Boards (RWQCBs). The SWRCB enacts and enforces the federal NPDES program and all water quality programs and regulations that cross regional boundaries. The nine RWQCBs enact, administer, and enforce all programs, including NPDES permitting, within their jurisdictional boundaries. The proposed project is within Region 5 and is managed by the Central Valley RWQCB.

The SWRCB regulates stormwater discharges from construction sites. Any construction activity, including grading, that would result in a Disturbed Soil Area (DSA) of 1 acre or greater, and/or are smaller sites that are part of a larger common plan of development are subject to the SWRCB's NPDES General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (Order No. 2022-0057-DWQ, NPDES No. CAS000002) (Construction General Permit).[46] The proposed project involves grading of a 2.26-acre site and would apply for the NPDES Construction General Permit (CGP). The CGP requires preparation of a Stormwater Pollution Prevention Plan (SWPPP) and implementation of construction best management practices (BMPs) during construction activities. Construction BMPs would include, but not be limited to, erosion and sediment control, designed to minimize erosion and retain sediment on site, and good housekeeping practices to prevent spills, leaks, and discharge of construction debris and waste into receiving waters. Additionally, Section 6-714 of the City's Municipal Code also requires the implementation of BMPs to the maximum extent technologically and economically feasible to prevent and reduce pollutants from entering stormwater during construction.[47] The construction contractor(s) would be required to operate and maintain these controls throughout the duration of construction activities and to maintain an inspection log.

The SWRCB and the RWQCBs implement and enforce California's Municipal Stormwater Program. The Municipal Stormwater Program regulates stormwater discharges from municipal separate storm sewer systems (MS4s) throughout California. The USEPA defines an MS4 as "any conveyance or system of conveyances (roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, human-made channels, and storm drains) owned or operated by a state, city, town, county, or other public body having jurisdiction over stormwater, which are designed or used for collecting or conveying stormwater." The City of Fresno operates under the California Regional Water Quality Control Board Central Valley Regional National Pollutant Discharge Elimination System Permit and

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46 California State Water Resources Control Board (SWRCB). 2022. *National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities.* 2022. Website: https://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2022/wqo_2022-0057-dwq.pdf (accessed March 19, 2026).

47 City of Fresno. 2026. Code of Ordinances. Section 6-714. Requirements to Prevent, Control, and Reduce Stormwater Pollutants. Website: https://library.municode.com/ca/fresno/codes/code_of_ordinances?nodeId=MUCOFR_CH6MUSEUT_ART7URSTWAQUMADICO_S6-714REPRCORESTWAPO (accessed March 19, 20206).

Waste Discharge Requirements General Permit for Discharges from Municipal Separate Storm Sewer Systems (MS4) (Order No. R5-2016-0040-014, NPDES No. CAS0085324).

The Fresno Metropolitan Flood Control District (FMFCD) manages stormwater runoff locally. The major elements of the FMFCD's flood control system include dams, reservoirs, and detention basins. The FMFCD is responsible for reviewing development proposals to assess drainage and flood control impacts and needs, in addition to determining applicable requirements and modifications needed to implement the Storm Drainage and Flood Control Master Plan.

The City of Fresno is within the Tulare Lake Basin and is under the jurisdiction of the Central Valley RWQCB (Region 5). The Central Valley RWQCB Region is divided into three basins, the Sacramento River Basin, the San Joaquin River Basin, and the Tulare Lake Basin in which the project is located. The Central Valley RWQCB monitors surface water quality through implementation of the Water Quality Control Plan for the Tulare Lake Basin (Basin Plan) and designates beneficial uses for surface water bodies and groundwater in the basin. The Basin Plan also contains water quality criteria for groundwater.

Construction. Pollutants of concern during construction include sediments, trash, petroleum products, concrete waste (dry and wet), sanitary waste, and chemicals. Each of these pollutants on its own or in combination with other pollutants can have a detrimental effect on water quality. During construction activities, excavated soil would be exposed, and there would be an increased potential for soil erosion and sedimentation compared to existing conditions. In addition, chemicals, liquid products, petroleum products (e.g., paints, solvents, and fuels), and concrete-related waste may be spilled or leaked, and they have the potential to be transported via stormwater runoff into receiving waters.

Construction of the proposed project would result in grading an area of 1 acre or greater and therefore would be subject to the requirements of the CGP, including preparation of an SWPPP and implementation of construction BMPs. Construction BMPs would include, but are not limited to, Erosion Control and Sediment Control BMPs designed to minimize erosion and retain sediment on site as well as Good Housekeeping BMPs to prevent spills, leaks, and discharge of construction debris and waste into receiving waters. As discussed above, the proposed project must comply with Chapter 6, Article 7 (Urban Storm Water Quality Management and Discharge Control) of the City's Municipal Code, particularly Section 6-714 which requires all qualifying land development/ redevelopment projects to incorporate BMPs prescribed by the City to control the volume, rate, and to reduce or eliminate the potential pollutant load of stormwater runoff from new development and redevelopment projects as may be appropriate to minimize the generation, transport and discharge of pollutants.[48] The SWPPP shall identify all BMPs that will be incorporated into the project to control stormwater and non-stormwater pollutants during construction and shall be revised as necessary.

[48] City of Fresno. 2026. Code of Ordinances. Section 6-714. Requirements to Prevent, Control, and Reduce Stormwater Pollutants. Website: https://library.municode.com/ca/fresno/codes/code_of_ordinances?nodeId=MUCOFR_CH6MUSEUT_ART7URSTWAQUMADICO_S6-714REPRCORESTWAPO (accessed March 19, 2026).

Operations. The project site is relatively flat and does not contain streams or rivers. Under existing conditions, the project site consists of a surface parking lot and is comprised entirely of impervious surface area. The proposed project would install two storm drain inlets on-site to manage stormwater runoff from the 2.26-acre site. Proposed permeable surfaces such as landscaped areas would infiltrate stormwater naturally. Runoff would be conveyed via a 12-inch PVC sewer pipe and tie into an existing 36-inch storm drain main located within the internal driveway connecting to Inyo Street at the northern edge of the project site.

The project would not involve the storage of chemicals on site. Project operation would not involve ground disturbance, which would limit the potential for off-site migration of sediment and adsorbed pollutants in runoff. Operational activities of the project would be the same as under existing conditions for the existing water and sewer system and would not result in an increase of impervious surfaces. Consistent with the City of Fresno's MS4 Permit, the project would implement stormwater quality controls recommended in the Fresno-Clovis Storm Water Quality Management Construction and Post-Construction Guidelines. Compliance with the City of Fresno's MS4 Permit requirements would reduce the potential for the discharge of pollutants to receiving waters during project operations.

Infiltration of stormwater could have the potential to affect groundwater quality. However, the majority of the project site would be impervious surface; and therefore, it is not expected that stormwater would infiltrate at levels that could significantly degrade groundwater quality during project operations. Because stormwater would be collected and diverted to the storm drain system, there is not a direct path for pollutants to reach groundwater.

Adherence with the CGP, the City's MS4 permit, the Fresno-Clovis Storm Water Quality Management Construction and Post-Construction Guidelines, Chapter 6, Article 7 of the City's Municipal Code, and implementation of required BMPs, would ensure construction and operation of the proposed project would not result in any significant effects relating to water quality pursuant to Section 15332(d) of the *State CEQA Guidelines*.

(e) The site can be adequately served by all required utilities and public services.

Utilities. The project would result in the installation of curb, gutter, and concrete sidewalk, along the project site frontages on the internal driveway connecting to Inyo Street, and along the project frontage on Mono Street (refer to Figure 3). The project includes interconnection to utilities such as water, stormwater, electrical, sewer, and telecommunications within H Street, Inyo Street, and Mono Street rights-of-way for service to the project site. Existing water facilities along Mono Street would be relocated behind the fire access lane curb.

> ***Drainage.*** As discussed above, the project would install two storm drain inlets on-site to manage stormwater runoff from the 2.26-acre site. Proposed permeable surfaces such as landscaped areas would infiltrate stormwater naturally. Runoff would be conveyed via a 12-inch PVC sewer pipe and tie into an existing 36-inch storm drain main.
>
> The approval of drainage features and other utility improvements occurs through the building plan check process. As part of this process, all project-related drainage features and utility

infrastructure would be required to comply with City Municipal Code Chapter 6, Article 7, the standard plans and specifications of the FMFCD, and Central Valley RWQCB standards. On-site project-related drainage features would be designed, installed, and maintained per City MS4 standards and the Fresno-Clovis Storm Water Quality Management Construction and Post-Construction Guidelines. Therefore, the proposed project would be adequately served by existing stormwater and drainage infrastructure.

Energy. Electricity would be the main form of energy consumed on the project site. Electricity would mainly be used for building lighting, elevators, EV charging, and security. Operations of the proposed project would not include natural gas, and no natural gas demand is anticipated during operation of the proposed project. The expected energy consumption during construction and operation of the proposed project would be consistent with typical usage rates for parking facilities; however, energy consumption is largely a function of daily usage and the physical structure and layout of the building.

Electricity is provided in the State through a complex grid of power plants and transmission lines. In 2024, California's in-State electric generation totaled 216,181 gigawatt-hours (GWh), and the State's total system electric generation, which includes imported electricity, totaled 278,338 GWh. In 2024, non-greenhouse gas and renewable sources of electricity generation made up 59.77 percent of California's in-state generation.[49]

Pacific Gas & Electric (PG&E) is the private utility that would supply the proposed project's electricity services. In 2024, a total of 98 percent of PG&E's delivered electricity came from non-greenhouse gas producing sources.[50] PG&E reached California's 2020 renewable energy goal in 2017 and is positioned to meet the State's 60 percent by 2030 renewable energy mandate set forth in Senate Bill (SB) 100. In addition, PG&E plans to continue to provide reliable service to their customers and upgrade their distribution systems as necessary to meet future demand.

The State of California provides a minimum standard for building design and construction standards through Title 24 of the California Code of Regulations (CCR), known as the California Building Code (CBC). The CBC is updated every three years, and the current 2025 CBC went into effect in January 2026. Compliance with Title 24 is mandatory at the time new building permits are issued by local governments. The California Building Standards Commission (CBSC) adopted Part 11 of the Title 24 Building Energy Efficiency Standards (also referred to as the California Green Building Standards Code, or CALGreen Code) in 2010 as part of the State's efforts to reduce greenhouse gas emissions and energy consumption from residential and nonresidential

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49 California Energy Commission (CEC). 2024 Total System Electric Generation. Website: https://www.energy.ca.gov/data-reports/energy-almanac/california-electricity-data/2024-total-system-electric-generation (accessed March 19, 2026).

50 Pacific Gas & Electric (PG&E). 2024. *Clean Energy Solutions.* Website: https://www.pge.com/en/about/corporate-responsibility-and-sustainability/taking-responsibility/clean-energy-solutions.html (accessed March 19, 2026).

buildings.[51] The CALGreen Code was updated in 2025 (effective January 2026) and covers the following five categories: (1) planning and design, (2) energy efficiency, (3) water efficiency and conservation, (4) material conservation and resource efficiency, and (5) indoor environmental quality.[52] The project would comply with the current 2025 CALGreen Code requirements and Title 24 efficiency standards, which would further improve energy efficiency during operation.

Increasingly stringent electricity efficiency standards combined with compliance with the CBC and CALGreen Code would ensure operation of the project would demand only the energy required. Therefore, the proposed project would be adequately served by existing electricity services.

Water. The proposed project would require connection to an existing 16-inch PVC water main within the Mono Street right-of-way. The project would install a new 2-inch domestic water meter and back flow preventer per City requirements. Existing water facilities along Mono Street would be relocated behind the fire access lane curb with a traffic-rated lid.

The project site is located within the service territory of the City of Fresno Department of Public Utilities, Water Division. The City of Fresno delivers drinking water to more than 142,200 residential, commercial, and industrial customers over a 114-square-mile area of the City.[53] The City historically relied entirely on groundwater until 2004, when the Northeast Surface Water Treatment Facility (NESWTF) became operational.[54] Subsequent additions of the T-3 Surface Water Treatment Facility in 2015 and the Southeast Surface Water Treatment Facility in 2018 have resulted in a more balanced use of groundwater and surface water.[55] The City now manages its water supply adaptively based on hydrologic conditions. During wet years, surface water use is prioritized, and excess supplies are used to recharge groundwater basins. During dry years, the City relies primarily on stored groundwater reserves. This conjunctive use strategy enhances drought resilience and ensures reliable water supply for residential and commercial demands under varying hydrologic conditions.

Based on the City's 2020 Urban Water Management Plan (UWMP), the water supplies under normal conditions for the City from 2025 (329,030 acre-feet [af] per year [afy]) to 2045 (357,330 afy) would be sufficient to cover the potable water demand (i.e., 136,504 af by 2025 and

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51 California Energy Commission (CEC). n.d. *Building Energy Efficiency Standards – Title 24, Part 6.* Website: https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards (accessed March 19, 2026).

52 California Department of General Services. 2026. *2025 California Green Building Standards Code, Title 24, Part 11.* Website: https://codes.iccsafe.org/content/CAGBC2025P1 (accessed March 19, 2026).

53 City of Fresno. 2026. *Water Operations.* Website: https://www.fresno.gov/publicutilities/water-division/water-operations/ (accessed March 20, 2026).

54 City of Fresno. 2026. *Water Resource Management*. Website: https://www.fresno.gov/publicutilities/water-division/water-resource-management/#drought-resiliency (accessed March 20, 2026).

55 City of Fresno. 2026. *Water Resource Management*. Website: https://www.fresno.gov/publicutilities/water-division/water-resource-management/#drought-resiliency (accessed March 20, 2026).

167,947 af by 2045) for each normal year respectively.[56] During a single dry year, water supplies for the City from 2025 (188,852 afy) to 2045 (211,158 afy) would be sufficient to cover the potable water demand for each year (i.e., 136,504 af by 2025 and 167,947 af by 2045), respectively.[57] After a 5-year dry period, water supplies for the City from 2025 (315,000 afy) to 2045 (340,000 afy) would be sufficient to cover the potable water demand for each year (i.e., 136,504 af by 2025 and 167,947 af by 2045), respectively.[58]

The main water demand of the proposed project would be for landscape irrigation and fire suppression. The proposed project is consistent with the site's zoning and land use designation in the General Plan and constitutes a land use that would require less water than other permitted uses such as multi-unit residential projects. In addition, the proposed project would be subject to the payment of any applicable connection charges and/or fees and extension of services in a manner that is compliant with the Department of Public Utilities standards, specifications, and policies. Therefore, the proposed project would be consistent with growth under the City's General Plan and would be accounted for in the City's UWMP projections, and the City would have sufficient water supplies available to serve the project.

***Wastewater*.** The project site is within the sewer service area of the City of Fresno through the Department of Public Utilities Wastewater Management Division. The City of Fresno owns and operates two wastewater treatment facilities. They are the Fresno/Clovis Regional Wastewater Reclamation Facility and the North Fresno Wastewater Reclamation Facility. The Fresno/Clovis Regional Wastewater Reclamation Facility currently has a capacity of 87 million gallons per day (mgd). The North Fresno Wastewater Reclamation Facility has a capacity of 1.07 mgd.

Wastewater generation associated with the proposed project is not anticipated to exceed wastewater treatment requirements or exceed the available capacity to accommodate the increased wastewater flows from the proposed project. Due to the nature of the proposed parking uses, the proposed project would not generate a substantial amount of wastewater and would be adequately served by the capacity and the existing wastewater conveyance system. In addition, the proposed project would be subject to the payment of any applicable connection charges and/or fees and extension of services in a manner that is compliant with the Department of Public Utilities standards, specifications, and policies. Therefore, the proposed project would have sufficient wastewater infrastructure available to serve the project.

***Solid Waste*.** Garbage disposed of in the City of Fresno is taken to Cedar Avenue Recycling and Transfer Station. Once trash has been off-loaded at the transfer station, it is sorted, and non-recyclable solid waste is loaded onto large trucks and taken to the American Avenue Landfill located approximately 6 miles southwest of Kerman, and 20 miles west of the project site.

The American Avenue Landfill (i.e., American Avenue Disposal Site 10-AA-0009) has a maximum permitted capacity of 32,700,000 cubic yards and a remaining capacity of 29,358,535 cubic

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56 City of Fresno. 2021. *2020 Urban Water Management Plan.* Website: https://www.fresno.gov/wp-content/uploads/2023/03/Fresno-2020-UWMP_Final_2021-07-21.pdf (accessed April 7, 2026).

57 *Ibid.*

58 *Ibid.*

yards, with an estimated closure date of August 31, 2031. The maximum permitted throughput is 2,200 tons per day. [59]

The proposed use (e.g., parking structure) is not considered a use that would generate high volumes of waste as on-site solid waste disposal would be generally limited to personal consumer waste. Given the available capacity at the landfills, the solid waste generated by the proposed project is not anticipated to cause the facility to exceed its daily permitted capacity. As such, the project would be served by a landfill with sufficient capacity to accommodate the project's waste disposal needs.

Summary. All proposed improvements and interconnection to drainage, electric power, telecommunications, water, and wastewater facilities would be installed simultaneously with finished grading activities and required roadway frontage improvements for the project. The areas of potential impact from drainage and utility infrastructure improvements are included in the analytical footprint of the project and associated technical studies, and impacts are found to be less than significant. As a result, interconnection to the existing utilities in the project vicinity would not result in substantial disturbance to native habitat or soils, historical resources, or to the operation of existing roadways and utilities. There would be no significant environmental effects specifically related to the installation of utility interconnections that are not encompassed within the project's construction and operational footprints, and therefore are already identified, disclosed, and subject to all applicable local, State, and federal regulations specified above. Therefore, the site can be adequately served by all required utilities pursuant to Section 15332(e) of the *State CEQA Guidelines*.

Public Services. The City would provide the following public services to the project site:

Fire. The City of Fresno Fire Department (FFD) provides full-time fire suppression, fire prevention, urban search and rescue, hazardous material response, and other related emergency services to the City of Fresno and the project site. There are 20 FFD fire stations in Fresno, with the closest fire station, FFD Headquarters, located approximately 0.15 mile northwest of the project site.[60] Average travel time between FFD Headquarters and the project site is 1 minute.

The proposed project includes a fire access lane parallel to H Street, located between the adjacent property and the parking structure. Access is provided via a new driveway from the existing internal driveway connecting to Inyo Street, leading to a 26-foot-wide concrete lane with rolled curbs designated as fire lanes. Egress is provided by a driveway on Mono Street, approximately 100 feet west of the H Street intersection. Driveways entering and exiting fire access lane are designed to accommodate FFD fire trucks, have a minimum 44-foot centerline turn radius, and allow for hammerhead turning movements. Additional fire service infrastructure

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59 California Department of Resources Recycling and Recovery (CalRecycle). n.d. SWIS Facility/Site Summary. American Avenue Disposal Site (10-AA-0009). Website: https://www2.calrecycle.ca.gov/SolidWaste/Site/Summary/352 (accessed March 20, 2026).

60 City of Fresno. n.d. *Fire Department.* Website: https://www.fresno.gov/fire/ (accessed March 18, 2026).

associated with the proposed project includes installation of two fire hydrants and construction of a fire water service lateral that connects to the existing City water main.

The project could result in an incremental increase in the demand for fire protection services. However, the proposed project would be required to comply with all applicable codes for fire safety and emergency access. The proposed project would not involve any components (i.e., construction of residential units or businesses) which would directly increase population growth and the project would support planned infill within the Downtown Fresno area. The proposed project does not have any features that would create potential for increased fire services beyond what would be necessary for parking uses permitted under the City's zoning. The FFD would continue providing services to the project site and would not require additional firefighters to serve the proposed project. The project would not result in the need for the construction of new or expanded fire station facilities.

The proposed project design would be submitted to and approved by the FFD prior the issuance of building permits to ensure the project would conform to applicable building codes. Based on the information and analysis above, the addition of a 294,118-square-foot open air parking structure consistent with the General Plan and zoning and constructed on an infill site in accordance with applicable policies designed to minimize fire-related hazards (i.e., CBC and California Fire Code) would not require new or physically altered fire protection facilities. Furthermore, the City would be responsible for the Fire Facilities Fee pursuant to Chapter 12, Article 4.9 of the Fresno Code of Ordinances to account for the potential impacts to fire service facilities.[61]

Police. The City of Fresno Police Department (FPD) provides police protection to the project site. The Police Department Patrol Division is divided into five policing districts with the proposed project being within the Southwest Policing District.[62] The Southwest Police District station is located approximately 0.6 mile from the project site.

The proposed project would support planned infill within the Downtown Fresno area. Planned growth under the General Plan would increase calls for police protection service in the City. The project could result in an incremental increase in the demand for police protection services; however, the proposed project is consistent with the site's General Plan designation and does not represent unplanned growth. The proposed project would not involve any components which would directly increase population growth, nor does the project involve any features that would create the potential for increased police services beyond what would be necessary for parking uses permitted under the City's zoning. The FPD would continue to provide services to

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61 City of Fresno. 2026. *Code of Ordinances. Chapter 12- Impact Fees, Historic Resources, and other Miscellaneous Topics. Article 4.9- Fire Facilities Fee.* Website: https://library.municode.com/ca/fresno/codes/code_of_ordinances?nodeId=MUCOCHFRCA_CH12IMFEHIREOTMITO_ART4.9FIFAFE (accessed March 18, 2026).

62 City of Fresno. n.d. *Welcome to the Fresno Police Department*. Website: https://www.fresno.gov/police/#police-district-locator (accessed March 18, 2026).

the project site and would not require additional officers to serve the project site. The project would not result in the need for the construction of new or expanded police facilities.

Additionally, the City would be responsible for the Police Facilities Fee pursuant to Chapter 12, Article 4.8 of the Fresno Code of Ordinances to account for the potential impacts to police protection services.[63] The Police Facilities Fee is a one-time charge applied to new development and are imposed to raise revenue for the construction or expansion of capital facilities located outside of project boundaries of a new development that benefit the area. Payment of the Police Facilities Fee commensurate with the increased demand for services in the City would offset any increase in demand for police services. The addition of a 294,118-square-foot open air parking structure consistent with the General Plan and zoning and constructed on an infill site in accordance with applicable policies designed to minimize crime would not require new or physically altered police protection facilities.

Schools. No unplanned population growth would occur as a result of the construction or operation of the proposed project, as the proposed project is a parking garage that would support planned infill within the Downtown Fresno area. Additionally, the project does not include housing; therefore, no increase in the number of school-age students would occur. Therefore, the project would not generate student demand or otherwise impact school services and would not have an adverse effect related to schools.

Parks. The proposed project would support planned infill within the Downtown Fresno area with the construction of a 294,118-square-foot open air parking structure. The project is consistent with the City General Plan and the Citywide Development Code, and no unplanned population growth would occur as a result of the construction or operation of the proposed project. Therefore, development of the project would not create a significant increase in the use of existing neighborhood or regional parks or other recreational facilities or require construction of new or expansion of existing park facilities.

Libraries and City Administrative Services. The proposed project would not generate permanent population in the City that would require access to public facilities, including the Fresno County Central Public library, located approximately 0.55 mile northeast of the project site. The proposed project would support planned infill within the Downtown Fresno area through construction of a 294,118-square-foot open-air parking structure, which is consistent with the City General Plan and the Citywide Development Code. Therefore, development of the proposed project would not increase demand for other public services, including libraries, community centers, and public health care facilities, and the site can be adequately served by all required public facilities pursuant to Section 15332(e) of the *State CEQA Guidelines*.

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63 City of Fresno. 2026. *Code of Ordinances. Chapter 12- Impact Fees, Historic Resources, and other Miscellaneous Topics. Article 4.8- Police Facilities Fee.* Website: https://library.municode.com/ca/fresno/codes/code_of_ordinances?nodeId=MUCOCHFRCA_CH12IMFEHIREOTMITO_ART4.9FIFAFE (accessed March 18, 2026).

EVALUATION OF EXCEPTIONS TO THE CLASS 32 (IN-FILL) EXEMPTION CRITERIA

Exceptions (Section 15300.2 of the *State CEQA Guidelines*) to the CEQA Class 32 categorical exemption would apply if the project triggers any of the criteria or conditions described in this section. The following analysis compares the criteria in *State CEQA Guidelines* Section 15300.2 (Exceptions) to the project, and concludes, based on substantial evidence, that none of the exceptions are applicable to the project.

(a) Location. Classes 3, 4, 5, 6, and 11 are qualified by consideration of where the project is to be located—a project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant. Therefore, these classes are considered to apply all instances, except where the project may impact on an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies.

The project is consistent with the Class 32 Categorical Exemption (Section 15332 of the *State CEQA Guidelines*) and therefore is not subject to the Location Exception (Section 15300.2(a))

(b) Cumulative Impact. All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.

Section 15300.2(b)) of the *State CEQA Guidelines* requires consideration of the same types of projects in the same place when determining if a project would have a significant cumulative effect.

Cumulative air quality impacts are based on projections in the regional Air Quality Management Plan (AQMP). Because the project is consistent with the General Plan land use and zoning designations for the site, the project is consistent with growth projections of the General Plan and would not conflict with or obstruct implementation of the regional AQMP.

No single project is sufficient in size, by itself, to result in nonattainment of ambient air quality standards. Instead, a project's individual emissions would contribute to existing cumulatively significant impacts to air quality. The SJVAPCD developed the operational thresholds of significance based on the level above which a project's individual emissions would result in a cumulatively considerable contribution to the SJVAB's existing air quality conditions. Therefore, a project that exceeds the SJVAPCD operational thresholds would also have a cumulatively considerable contribution to a significant cumulative impact.

Due to the nonattainment status of the Basin, the primary air pollutants of concern would be nitrogen oxides (NO_x) and volatile organic compounds (VOC), which are ozone precursors, and particulate matter less than 10 microns in size (PM_{10}) and particulate matter less than 2.5 microns in size ($PM_{2.5}$). As detailed in Table E, above, long-term emissions were calculated for NOx, VOC, CO, sulfur oxides (SO_x), PM_{10}, and $PM_{2.5}$ expected to be generated through operation of the proposed project, and project-related emissions would not exceed the established SJVAPCD emission thresholds for any criteria pollutants. Without any exceedance in air quality emissions thresholds, the proposed project would not result in a cumulatively considerable contribution to significant air quality impacts.

A Trip Generation Analysis and Vehicle Miles Traveled Screening Analysis Memorandum (Attachment B) was prepared for the project through consultation with the City's Traffic Engineering Division, and the analysis showed that the project would conservatively generate four (4) new daily trips (two inbound and two outbound), and no new a.m. or p.m. peak hour trips. The number of trips the project would generate is well below the City's 200-peak hour trip threshold in TIZ I to prepare a TIA, which the City typically requires when there is a potential for a project to have an adverse effect on the surrounding transportation network. According to the policy, a project would be required to maintain a peak hour LOS standard of F and better for intersections and roadway segments, and generate lower than 200 peak hour trips to not require a TIS. It is acknowledged in the City's General Plan that the LOS within the Downtown Planning Area could deteriorate to LOS F. Since the number of trips the project would generate is well below the City's threshold to prepare a TIA, the addition of the proposed project traffic would not create any significant adverse impacts to nearby intersections.

Additionally, according to the Fresno COG Guidelines, projects generating fewer than 500 daily vehicle trips may be screened out from detailed VMT analysis.[64] The proposed project is estimated to generate up to 4 daily trips and therefore qualifies as a small project eligible for screening. Furthermore, the proposed installation of all-way stop control at the H Street/Mono Street intersection is considered a transportation system improvement that does not add vehicle capacity and is also eligible for screening under the VMT Guidelines. As such, the project would not cause a substantial increase in VMT and can be screened out from further VMT analysis.

The results of the California Emissions Estimator Model (CalEEMod) (Attachment D) for the proposed project indicate that during the building construction phase, an additional 683 acoustically equivalent trips would occur during an average day from worker and delivery activities. Because the existing traffic volume on these roads are considerably more than 683 vehicles, construction-related vehicle trips would not approach existing daily traffic volume, and traffic noise would not increase by 3 dBA L_{dn}. A noise level increase of less than 3 dBA would not be perceptible to the human ear in an outdoor environment. Therefore, there would not be an audible increase from construction crew commutes and the transport of construction equipment and materials to the project site.

Long-term noise would be generated from vehicle traffic entering and exiting the site. Based on the project's Trip Generation Analysis and Vehicle Miles Traveled Screening Analysis Memorandum (Attachment B), the project is anticipated to generate 4 new patron trips. Considering that the existing traffic on H-Street and Mono Street is considerably more than 4 vehicles, project-generated vehicle trips would not approach existing daily traffic volumes and traffic noise would not increase by 3 dBA Community Noise Equivalent Level (CNEL). A noise level increase of less than 3 dBA would not be perceptible to the human ear in an outdoor environment; therefore, the traffic noise increase in the vicinity of the project site resulting from the proposed project would be less than significant.

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64 Fresno Council of Governments (Fresno COG). 2025. *Fresno County SB 743 Implementation Regional Guidelines.* Website: https://www.fresnocog.org/wp-content/uploads/2025/10/Fresno-COG-VMT-Thresholds-June-2025_10072025.pdf (accessed April 2026).

Neither the project site nor the local area is particularly sensitive in terms of biological resources. The project site is in downtown Fresno and entirely developed as a paved parking lot. Vegetation on-site is limited to landscaped trees and shrubs along the perimeter and weedy plants in unmaintained areas. No plant or wildlife species listed as special-status, endangered, rare, or threatened were observed on the project site, and none are expected to occur due to the site's developed nature, relatively small size, and isolation from open space with suitable habitat to support these species. Potential impacts to native nesting bird species could occur if the trees on-site are removed during the nesting season (February 1 to September 30). However, if project activities must occur during the nesting season, pre-activity nesting bird surveys will be conducted no more than seven (7) days prior to the start of construction at the construction site plus a 100-foot buffer. If no active nests are found, no further action is required; however, note that nests may become active at any time throughout the summer, including when construction activities are occurring. If active nests are found during the survey or at any time during project construction, an avoidance buffer will be established by a qualified biologist. The avoidance buffer will remain in place until the biologist has determined that the young are no longer reliant on the nest. Work may occur within the avoidance buffer under the approval and guidance of the biologist. The biologist will have the ability to stop construction if nesting adults show signs of distress. The results of the pre-activity survey, and monitoring, if necessary, will be summarized in a brief memo report submitted to the City of Fresno. Implementation of the described avoidance and minimization measure (Nesting Bird Survey) would result in a less than significant impact.

The project site's location in an urbanized area, relatively small size, and lack of suitable habitat renders the site unlikely to support any endangered, rare, or threatened plant and animal species with potential to occur in the project vicinity. Disturbances from prior discing of the site and vehicle use, and the resulting competitive exclusion by invasive non-native plants limit the potential for native flora to occur or to host special-status, endangered, rare, or threatened animal species on the site. For these reasons, impacts to biological resources would not be cumulatively considerable.

There are no known historical resources or archaeological resources pursuant to *State CEQA Guidelines* Section 15064.5 on the project site. The project site is not within a historic district. According to the local historic register, there are three historic resources along H Street: Hobbs Parsons Produce Company, Dale Bros. Coffee Company Sign, and Benham Ice Cream/Dale Bros. Coffee Company.[65] The project site is not included on the local historic register. The proposed project consists of the development of a parking structure on a site that is currently developed as a surface parking lot with associated paving, lighting, and minor landscaping. The project site has been subject to extensive prior disturbance, including grading and installation of utilities and infrastructure, which has substantially altered subsurface conditions. Therefore, the likelihood of archaeological resources being present within the project site is negligible. Since development of the project site is not expected to impact cultural resources, the project is not expected to result in a cumulatively considerable impact to cultural resources.

[65] City of Fresno. 2020. *A Guide to Historic Architecture in Fresno, California.* Website: https://historicfresno.org/home.htm (accessed March 20, 2026).

Finally, as detailed throughout *State CEQA Guidelines* Section 15300.2 (e), sufficient utilities and public facilities are available to serve the project in addition to existing entitlements and capacity.

The project would not have a cumulatively considerable impact on the environment when evaluated in conjunction with similar types of warehouse projects in the same place and therefore is not subject to the Cumulative Impact Exception (Section 15300.2(b)).

(c) Significant Effect. A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.

The project is a parking structure on an infill site within the Fulton Corridor Specific Plan (FCSP) and Downtown Neighborhood Community Plan (DNCP) and is designated by the General Plan as Downtown Core and is within the DTC zoning district, where parking is a permitted use. Since the project consists of a structured parking facility located within an area planned for infill development and centralized parking management, the project is consistent with the FCSP, Citywide Development Code, the DNCP, and the City of Fresno General Plan.

The project site is surrounded by Chukchansi Park to the north; surface parking with solar carports to the northwest; a dirt lot to the northeast; the railroad tracks to the south, southwest, and southeast; and commercial uses to southeast. The nearest sensitive receptors in proximity to the project site are the residences to the southwest, approximately 615 feet from the project boundary. Figure 1 depicts the location of the project site on a local scale, and Figure 2 depicts the project site and surrounding land uses. Accordingly, the proposed project does not involve any unusual circumstances that could result in a significant impact.

The Biological Resources Review, Trip Generation Analysis and Vehicle Miles Traveled Screening Analysis Memorandum, the Noise and Vibration Impact Technical Memorandum, and the Air Quality and Greenhouse Gas Emissions Technical Memorandum (provided as Attachments A, B, C, and D of this Categorical Exemption) for the project concluded that the project would not result in a significant impact related to these topics. No amendments to an adopted planning document would be required for implementation of the proposed project, and the proposed project would be consistent with the City's Municipal Code requirements. Given the urban nature of the project site, compatibility of the proposed project with the character of the surrounding uses, and the conservative analysis for adverse effects to the community, the project would not have a significant effect on the environment due to unusual circumstances and therefore is not subject to the Significant Effect Exception (Section 15300.2(c)).

(d) Scenic Highways. A categorical exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway. This does not apply to improvements which are required as mitigation by an adopted negative declaration or certified EIR.

According to the Caltrans mapping of State Scenic Highways, the County of Fresno has an officially designated State Scenic Highway located along State Route 180, east of the City of Fresno, starting

approximately 19.5 miles east of the project site.[66] Three eligible State Scenic Highways are also located within the County of Fresno. The nearest one is located along State Route 168, approximately 6.1 miles northeast of the project site. Since there are no eligible or officially designated State Scenic Highways within the immediate vicinity of the project site, the project would not affect scenic resources within a State Scenic Highway and is not subject to the Scenic Highways Exception (Section 15300.2(d)).

(e) Hazardous Waste Sites. A categorical exemption shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code.

Hazardous materials sites compiled pursuant to Government Code Section 65962.5 are listed on the "Cortese List" (named after the Legislator who authored the legislation that enacted it), which is maintained by the California Department of Toxic Substances Control (DTSC). The project site is not on any list of hazardous material sites compiled pursuant to Government Code Section 65962.5[67] and therefore is not subject to the Hazardous Waste Sites Exception (Section 15300.2(e)).

(f) Historical Resources. A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.

According to the City of Fresno General Plan, the City maintains a Local Register of Historic Resources that includes buildings, structures, objects, sites and districts that have sufficient integrity and are significant in Fresno's history. According to the local historic register, there are three historic resources along H Street: Hobbs Parsons Produce Company, Dale Bros. Coffee Company Sign, and Benham Ice Cream/Dale Bros. Coffee Company.[68] The proposed project site is not included on the local historic register.

In addition to individual listings, Fresno has three designated historic districts: the Porter Tract (near Fresno City College), Wilson Island (near the Tower District), and the Chandler Airfield/Fresno Municipal Airport. The proposed project site is not within any designated or proposed historic districts identified in the General Plan, FCSP, or DNCP.

The proposed project consists of the development of a parking structure on a site that is currently developed as a surface parking lot with associated paving, lighting, and minor landscaping. The project site has been subject to extensive prior disturbance, including grading and installation of utilities and infrastructure, which has substantially altered subsurface conditions. As a result, any potential cultural materials that may exist beneath the site would likely lack integrity and would not qualify as historical resources pursuant to *State CEQA Guidelines* Section 15064.5. The project does

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66 California Department of Transportation (Caltrans). 2025. *California State Scenic Highways: State Scenic Highway Map.* Website: https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways (accessed March 18, 2026).

67 California Department of Toxic Substances Control (DTSC). 2020. *Hazardous Waste and Substances Site List (Cortese).* Website: https://www.envirostor.dtsc.ca.gov/public/map/?myaddress=Fresno# (accessed March 20, 2026).

68 City of Fresno. 2020. *A Guide to Historic Architecture in Fresno, California.* Website: https://historicfresno.org/home.htm (accessed March 20, 2026).

not involve the demolition or alteration of any known historical resources, no historical structures are present on-site, and the proposed project site is not within a designated historic district. Therefore, the project would not cause a substantial adverse change in the significance of a historical resource, and the exception set forth in *State CEQA Guidelines* Section 15300.2(f) does not apply.

CONCLUSION

On the basis of substantial evidence, as discussed above, the project is eligible for a Class 32 Categorical Exemption in accordance with *State CEQA Guidelines* Section 15332, In-Fill Development Projects. Because the proposed project meets the criteria for categorically exempt in-fill development projects in *State CEQA Guidelines* Section 15332 and none of the exceptions to the categorical exemptions in *State CEQA Guidelines* Section 15300.2 apply, and it would not have a significant effect on the environment, this analysis finds that a Notice of Exemption may be prepared for the project.

REFERENCES

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ATTACHMENT A

BIOLOGICAL RESOURCES REVIEW

CARLSBAD
CLOVIS
EMERYVILLE
IRVINE
LOS ANGELES
PALM SPRINGS
RIVERSIDE
ROSEVILLE
SAN LUIS OBISPO

MEMORANDUM

DATE: April 7, 2026

TO: Kimberly Alvarado Vega
Utilities and On Site Project Management, Capital Projects Department
City of Fresno

FROM: Carie Wingert, Associate Biologist

SUBJECT: Biological Resources Review for the H Street Parking Building Project in the City of Fresno, Fresno County, California

This memorandum summarizes a review of the H Street Parking Building Project (Project) in downtown Fresno, California, for potential to impact special-status biological resources. The Project is located northwest of the intersection of H Street and Mono Street in downtown Fresno and includes redevelopment of an existing parking lot to replace it with a parking garage.

METHODS

Special-status resources evaluated for this Project include species listed or proposed to be listed as threatened or endangered or otherwise considered candidates for listing under the federal Endangered Species Act (FESA) and/or the California Endangered Species Act (CESA); species designated by the State as Fully Protected or Species of Special Concern; plant species with a California Rare Plant Rank (CRPR) in Categories 1 or 2; and aquatic features. A query of the California Department of Fish and Wildlife (CDFW) California Natural Diversity Database (CDFW 2026b) and Biogeographic Information and Observation System (CDFW 2026a), California Native Plant Society (CNPS) Inventory of Rare and Endangered Plants (CNPS 2026), and the United States Fish and Wildlife Service (USFWS) Information for Planning and Consultation (USFWS 2026) system was made on March 18, 2026, for the Project site plus a 5-mile search radius for information on endangered, threatened or rare plant or animal species known or with potential to occur in the Project vicinity. The results of the database query are included in Attachment A.

The results of the database searches were field-verified through a pedestrian survey focused on the Project site plus a 100-foot buffer (study area) during a site visit on March 18, 2026. Weather conditions during the site visit were sunny and clear with a very light breeze and a temperature around 77 degrees Fahrenheit (°F). All plants and animals encountered were documented. Representative photos are in Attachment B.

EXISTING CONDITIONS

The Project site is in downtown Fresno and entirely developed as a paved parking lot. A railroad corridor is present along the western boundary of the Project. Parking lots and buildings are present to the north and south. Undeveloped lots are present to the east; these lots were previously occupied by buildings and parking lots that have been demolished in the previous 5 years. No aquatic resources are present. Vegetation on site is limited to landscaped trees and shrubs along the perimeter and weedy plants in unmaintained areas. Plant species observed around the perimeter of the site included Chinese pistache (*Pistacia chinensis*) golden raintree (*Koelreuteria paniculata*), oleander (*Nerium oleander*), Chinaberry tree (*Melia azedarach*), cheeseweed (*Malva parviflora*), mouse barley (*Hordeum murinum*), lesser sea spurrey (*Spergularia marina*), and nettle-leaved goosefoot (*Chenopodiastrum murale*). Animal species observed include northern mockingbird (*Mimus polyglottos*), Brewer's blackbird (*Euphagus cyanocephalus*), and burrows that likely support California ground squirrels (*Otospermophilus beecheyi*).

RESULTS

As detailed in the Special-Status Species Summary in Attachment C, the developed nature of the site renders it unsuitable for any endangered, rare, or threatened plant and animal species known to occur in the Project vicinity. Trees on site may support native nesting birds, none of which are expected to be endangered, rare, or threatened. The Project site has no value as habitat for endangered, rare, or threatened species pursuant to Section 15332(c) of the *State CEQA Guidelines*.

Potential impacts to native nesting bird species could occur if the trees on site are removed during the nesting season (February 1 to September 30). Impacts to active nests could occur by direct destruction of nests during construction and/or by disturbance from noise and vibration caused by construction activities, which could lead to abandonment of nests and nestlings. Implementation of the following avoidance and minimization measure would result in a less than significant impact.

Nesting Bird Surveys

If Project activities must occur during the nesting season (February 1 to September 30), pre-activity nesting bird surveys will be conducted no more than seven (7) days prior to the start of construction at the construction site plus a 100-foot buffer. If no active nests are found, no further action is required; however, note that nests may become active at any time throughout the summer, including when construction activities are occurring. If active nests are found during the survey or at any time during Project construction, an avoidance buffer will be established by a qualified biologist. The avoidance buffer will remain in place until the biologist has determined that the young are no longer reliant on the nest. Work may occur within the avoidance buffer under the approval and guidance of the biologist. The biologist will have the ability to stop construction if nesting adults show sign of distress. The results of the pre-activity survey, and monitoring if necessary, will be summarized in a brief memorandum report submitted to the City of Fresno.

Attachments: A – Special-Status Species in the Vicinity of the Project
B – Site Photos
C – Special-Status Species Summary
D – References

ATTACHMENT A

DATABASE SEARCH RESULTS

CALIFORNIA NATIVE PLANT SOCIETY

CNPS Rare Plant Inventory

Search Results

7 matches found. Click on scientific name for details

Search Criteria: , Quad is one of [**3611967:3611977:3611976:3611966**]

▲ SCIENTIFIC NAME	COMMON NAME	FAMILY	LIFEFORM	BLOOMING PERIOD	FED LIST	STATE LIST	GLOBAL RANK	STATE RANK	CA RARE PLANT RANK	CA ENDEMIC	DATE ADDED	PHOTO
Castilleja campestris var. *succulenta*	succulent owl's-clover	Orobanchaceae	annual herb (hemiparasitic)	(Mar)Apr-May	FT	CE	G4? T2T3	S2S3	1B.2	Yes	1984-01-01	No Photo Available
Caulanthus californicus	California jewelflower	Brassicaceae	annual herb	Feb-May	FE	CE	G1	S1	1B.1	Yes	1984-01-01	No Photo Available
Imperata brevifolia	California satintail	Poaceae	perennial rhizomatous herb	Sep-May	None	None	G3	S3	2B.1		2006-12-26	 © 2020 Matt C. Berger
Leptosiphon serrulatus	Madera leptosiphon	Polemoniaceae	annual herb	Apr-May	None	None	G3	S3	1B.2	Yes	1980-01-01	 © 2008 Chris Winchell
Orcuttia inaequalis	San Joaquin Valley Orcutt grass	Poaceae	annual herb	Apr-Sep	FT	CE	G1	S1	1B.1	Yes	1974-01-01	No Photo Available

Sagittaria sanfordii	Sanford's arrowhead	Alismataceae	perennial rhizomatous herb (emergent)	May-Oct(Nov)	None	None	G3	S3	1B.2	Yes	1984-01-01
Tuctoria greenei	Greene's tuctoria	Poaceae	annual herb	May-Jul(Sep)	FE	CR	G1	S1	1B.1	Yes	1974-01-01



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Showing 1 to 7 of 7 entries

Go to top

Suggested Citation:

California Native Plant Society, Rare Plant Program. 2026. Rare Plant Inventory (online edition, v9.5.1). Website https://www.rareplants.cnps.org [accessed 25 March 2026].

}

Selected Elements by Scientific Name

California Department of Fish and Wildlife

California Natural Diversity Database

Query Criteria: BIOS selection

Species	Element Code	Federal Status	State Status	Global Rank	State Rank	Rare Plant Rank/CDFW SSC or FP
Ambystoma californiense pop. 1	AAAAA01181	Threatened	Threatened	G3T3	S3	WL
California tiger salamander - central California DPS						
Anniella pulchra	ARACC01020	None	None	G3	S2S3	SSC
Northern California legless lizard						
Antrozous pallidus	AMACC10010	None	None	G4	S3	SSC
pallid bat						
Ardea alba	ABNGA04040	None	None	G5	S4	
great egret						
Arizona elegans occidentalis	ARADB01017	None	None	G5T2	S2	SSC
California glossy snake						
Bombus pensylvanicus	IIHYM24260	None	None	G3G4	S2	
American bumble bee						
Buteo swainsoni	ABNKC19070	None	Threatened	G5	S4	
Swainson's hawk						
Caulanthus californicus	PDBRA31010	Endangered	Endangered	G1	S1	1B.1
California jewelflower						
Dipodomys nitratoides exilis	AMAFD03151	Endangered	Endangered	G2TH	SH	
Fresno kangaroo rat						
Efferia antiochi	IIDIP07010	None	None	G1G2	S1S2	
Antioch efferian robberfly						
Egretta thula	ABNGA06030	None	None	G5	S4	
snowy egret						
Eumops perotis californicus	AMACD02011	None	None	G4G5T4	S3S4	SSC
western mastiff bat						
Imperata brevifolia	PMPOA3D020	None	None	G3	S3	2B.1
California satintail						
Lasiurus cinereus	AMACC05032	None	None	G3G4	S4	
hoary bat						
Leptosiphon serrulatus	PDPLM09130	None	None	G3	S3	1B.2
Madera leptosiphon						
Lytta molesta	IICOL4C030	None	None	G2	S2	
molestan blister beetle						
Metapogon hurdi	IIDIP08010	None	None	G1G2	S1S2	
Hurd's metapogon robberfly						
Nycticorax nycticorax	ABNGA11010	None	None	G5	S4	
black-crowned night heron						
Perognathus inornatus	AMAFD01060	None	None	G3	S2S3	
San Joaquin pocket mouse						
Phrynosoma blainvillii	ARACF12100	None	None	G4	S4	SSC
coast horned lizard						
Sagittaria sanfordii	PMALI040Q0	None	None	G3	S3	1B.2
Sanford's arrowhead						

Record Count: 21

IPaC U.S. Fish & Wildlife Service

IPaC resource list

This report is an automatically generated list of species and other resources such as critical habitat (collectively referred to as *trust resources*) under the U.S. Fish and Wildlife Service's (USFWS) jurisdiction that are known or expected to be on or near the project area referenced below. The list may also include trust resources that occur outside of the project area, but that could potentially be directly or indirectly affected by activities in the project area. However, determining the likelihood and extent of effects a project may have on trust resources typically requires gathering additional site-specific (e.g., vegetation/species surveys) and project-specific (e.g., magnitude and timing of proposed activities) information.

Below is a summary of the project information you provided and contact information for the USFWS office(s) with jurisdiction in the defined project area. Please read the introduction to each section that follows (Endangered Species, Migratory Birds, USFWS Facilities, and NWI Wetlands) for additional information applicable to the trust resources addressed in that section.

Location

Fresno County, California



Local office

Sacramento Fish And Wildlife Office

(916) 414-6600
(916) 414-6713

Federal Building
2800 Cottage Way, Room W-2605
Sacramento, CA 95825-1846

NOT FOR CONSULTATION

Endangered species

This resource list is for informational purposes only and does not constitute an analysis of project level impacts.

The primary information used to generate this list is the known or expected range of each species. Additional areas of influence (AOI) for species are also considered. An AOI includes areas outside of the species range if the species could be indirectly affected by activities in that area (e.g., placing a dam upstream of a fish population even if that fish does not occur at the dam site, may indirectly impact the species by reducing or eliminating water flow downstream). Because species can move, and site conditions can change, the species on this list are not guaranteed to be found on or near the project area. To fully determine any potential effects to species, additional site-specific and project-specific information is often required.

Section 7 of the Endangered Species Act **requires** Federal agencies to "request of the Secretary information whether any species which is listed or proposed to be listed may be present in the area of such proposed action" for any project that is conducted, permitted, funded, or licensed by any Federal agency. A letter from the local office and a species list which fulfills this requirement can **only** be obtained by requesting an official species list from either the Regulatory Review section in IPaC (see directions below) or from the local field office directly.

For project evaluations that require USFWS concurrence/review, please return to the IPaC website and request an official species list by doing the following:

1. Draw the project location and click CONTINUE.
2. Click DEFINE PROJECT.
3. Log in (if directed to do so).
4. Provide a name and description for your project.
5. Click REQUEST SPECIES LIST.

Listed species[1] and their critical habitats are managed by the Ecological Services Program of the U.S. Fish and Wildlife Service (USFWS) and the fisheries division of the National Oceanic and Atmospheric Administration (NOAA Fisheries[2]).

Species and critical habitats under the sole responsibility of NOAA Fisheries are **not** shown on this list. Please contact NOAA Fisheries for species under their jurisdiction.

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1. Species listed under the Endangered Species Act are threatened or endangered; IPaC also shows species that are candidates, or proposed, for listing. See the listing status page for more information. IPaC only shows species that are regulated by USFWS (see FAQ).
2. NOAA Fisheries, also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

The following species are potentially affected by activities in this location:

Mammals

NAME	STATUS
Fresno Kangaroo Rat Dipodomys nitratoides exilis Wherever found There is **final** critical habitat for this species. Your location does not overlap the critical habitat. https://ecos.fws.gov/ecp/species/5150	Endangered
San Joaquin Kit Fox Vulpes macrotis mutica Wherever found No critical habitat has been designated for this species. https://ecos.fws.gov/ecp/species/2873	Endangered

Reptiles

NAME	STATUS
Blunt-nosed Leopard Lizard Gambelia silus Wherever found No critical habitat has been designated for this species. https://ecos.fws.gov/ecp/species/625	Endangered
Northwestern Pond Turtle Actinemys marmorata Wherever found No critical habitat has been designated for this species. https://ecos.fws.gov/ecp/species/1111	Proposed Threatened

NOT FOR CONSULTATION

Amphibians

NAME	STATUS
California Tiger Salamander Ambystoma californiense There is **final** critical habitat for this species. Your location does not overlap the critical habitat. https://ecos.fws.gov/ecp/species/2076	Threatened
Western Spadefoot Spea hammondii No critical habitat has been designated for this species. https://ecos.fws.gov/ecp/species/5425	Proposed Threatened

Insects

NAME	STATUS
Monarch Butterfly Danaus plexippus Wherever found There is **proposed** critical habitat for this species. Your location does not overlap the critical habitat. https://ecos.fws.gov/ecp/species/9743	Proposed Threatened

Crustaceans

NAME	STATUS
Vernal Pool Fairy Shrimp Branchinecta lynchi Wherever found There is **final** critical habitat for this species. Your location does not overlap the critical habitat. https://ecos.fws.gov/ecp/species/498	Threatened

Critical habitats

Potential effects to critical habitat(s) in this location must be analyzed along with the endangered species themselves.

There are no critical habitats at this location.

You are still required to determine if your project(s) may have effects on all above listed species.

Bald & Golden Eagles

Bald and Golden Eagles are protected under the Bald and Golden Eagle Protection Act [2] and the Migratory Bird Treaty Act (MBTA) [1]. Any person or organization who plans or conducts activities that may result in impacts to Bald or Golden Eagles, or their nests, should follow appropriate regulations and implement required avoidance and minimization measures, as described in the various links on this page.

The data in this location indicates that no eagles have been observed in this area. This does not mean eagles are not present in your project area, especially if the area is difficult to survey. Please review the 'Steps to Take When No Results Are Returned' section of the Supplemental Information on Migratory Birds and Eagles document to determine if your project is in a poorly surveyed area. If it is, you may need to rely on other resources to determine if eagles may be present (e.g. your local FWS field office, state surveys, your own surveys).

Additional information can be found using the following links:

- Eagle Management https://www.fws.gov/program/eagle-management
- Measures for avoiding and minimizing impacts to birds https://www.fws.gov/library/collections/avoiding-and-minimizing-incidental-take-migratory-birds
- Nationwide avoidance and minimization measures for birds https://www.fws.gov/sites/default/files/documents/nationwide-standard-conservation-measures.pdf
- Supplemental Information for Migratory Birds and Eagles in IPaC https://www.fws.gov/media/supplemental-information-migratory-birds-and-bald-and-golden-eagles-may-occur-project-action

Bald & Golden Eagles FAQs

What does IPaC use to generate the potential presence of bald and golden eagles in my specified location?

NOT FOR CONSULTATION

The potential for eagle presence is derived from data provided by the Avian Knowledge Network (AKN). The AKN data is based on a growing collection of survey, banding, and citizen science datasets and is queried and filtered to return a list of those birds reported as occurring in the 10km grid cell(s) which your project intersects, and that have been identified as warranting special attention because they are an eagle (Bald and Golden Eagle Protection Act requirements may apply).

Proper interpretation and use of your eagle report
On the graphs provided, please look carefully at the survey effort (indicated by the black vertical line) and for the existence of the "no data" indicator (a red horizontal line). A high survey effort is the key component. If the survey effort is high, then the probability of presence score can be viewed as more dependable. In contrast, a low survey effort line or no data line (red horizontal) means a lack of data and, therefore, a lack of certainty about presence of the species. This list is not perfect; it is simply a starting point for identifying what birds have the potential to be in your project area, when they might be there, and if they might be breeding (which means nests might be present). The list and associated information help you know what to look for to confirm presence and helps guide you in knowing when to implement avoidance and minimization measures to eliminate or reduce potential impacts from your project activities or get the appropriate permits should presence be confirmed.

How do I know if eagles are breeding, wintering, or migrating in my area?

To see what part of a particular bird's range your project area falls within (i.e. breeding, wintering, migrating, or resident), you may query your location using the RAIL Tool and view the range maps provided for birds in your area at the bottom of the profiles provided for each bird in your results. If an eagle on your IPaC migratory bird species list has a breeding season associated with it (indicated by yellow vertical bars on the phenology graph in your “IPaC PROBABILITY OF PRESENCE SUMMARY” at the top of your results list), there may be nests present at some point within the timeframe specified. If "Breeds elsewhere" is indicated, then the bird likely does not breed in your project area.

Interpreting the Probability of Presence Graphs

Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. A taller bar indicates a higher probability of species presence. The survey effort can be used to establish a level of confidence in the presence score.

How is the probability of presence score calculated? The calculation is done in three steps:
The probability of presence for each week is calculated as the number of survey events in the week where the species was detected divided by the total number of survey events for that week. For example, if in week 12 there were 20 survey events and the Spotted Towhee was found in 5 of them, the probability of presence of the Spotted Towhee in week 12 is 0.25.

To properly present the pattern of presence across the year, the relative probability of presence is calculated. This is the probability of presence divided by the maximum probability of presence across all weeks. For example, imagine the probability of presence in week 20 for the Spotted Towhee is 0.05, and that the probability of presence at week 12 (0.25) is the maximum of any week of the year. The relative probability of presence on week 12 is 0.25/0.25 = 1; at week 20 it is 0.05/0.25 = 0.2.

The relative probability of presence calculated in the previous step undergoes a statistical conversion so that all possible values fall between 0 and 10, inclusive. This is the probability of presence score.

Breeding Season ()
Yellow bars denote a very liberal estimate of the time-frame inside which the bird breeds across its entire range. If there are no yellow bars shown for a bird, it does not breed in your project area.

Survey Effort ()
Vertical black lines superimposed on probability of presence bars indicate the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps.

No Data ()
A week is marked as having no data if there were no survey events for that week.

Survey Timeframe
Surveys from only the last 10 years are used in order to ensure delivery of currently relevant information. The exception to this is areas off the Atlantic coast, where bird returns are based on all years of available data, since data in these areas is currently much more sparse.

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Migratory birds

The Migratory Bird Treaty Act (MBTA) [1] prohibits the take (including killing, capturing, selling, trading, and transport) of protected migratory bird species without prior authorization by the Department of Interior U.S. Fish and Wildlife Service (Service).

1. The Migratory Birds Treaty Act of 1918.
2. The Bald and Golden Eagle Protection Act of 1940.

Additional information can be found using the following links:

- Eagle Management https://www.fws.gov/program/eagle-management
- Measures for avoiding and minimizing impacts to birds https://www.fws.gov/library/collections/avoiding-and-minimizing-incidental-take-migratory-birds
- Nationwide avoidance and minimization measures for birds
- Supplemental Information for Migratory Birds and Eagles in IPaC https://www.fws.gov/media/supplemental-information-migratory-birds-and-bald-and-golden-eagles-may-occur-project-action

Measures for Proactively Minimizing Migratory Bird Impacts

Your IPaC Migratory Bird list showcases birds of concern, including Birds of Conservation Concern (BCC), in your project location. This is not a comprehensive list of all birds found in your project area. However, you can help proactively minimize significant impacts to all birds at your project location by implementing the measures in the Nationwide avoidance and minimization measures for birds

document, and any other project-specific avoidance and minimization measures suggested at the link Measures for avoiding and minimizing impacts to birds for the birds of concern on your list below.

Ensure Your Migratory Bird List is Accurate and Complete

If your project area is in a poorly surveyed area, your list may not be complete and you may need to rely on other resources to determine what species may be present (e.g. your local FWS field office, state surveys, your own surveys). Please review the Supplemental Information on Migratory Birds and Eagles document, to help you properly interpret the report for your specified location, including determining if there is sufficient data to ensure your list is accurate.

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, see the "Probability of Presence Summary" below to see when these birds are most likely to be present and breeding in your project area.

Review the FAQs

The FAQs below provide important additional information and resources.

NAME	BREEDING SEASON
Belding's Savannah Sparrow Passerculus sandwichensis beldingi This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA https://ecos.fws.gov/ecp/species/8	Breeds Apr 1 to Aug 15
Bullock's Oriole Icterus bullockii This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA	Breeds Mar 21 to Jul 25
California Gull Larus californicus This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds Mar 1 to Jul 31
Northern Harrier Circus hudsonius This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA https://ecos.fws.gov/ecp/species/8350	Breeds Apr 1 to Sep 15
Nuttall's Woodpecker Dryobates nuttallii This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA https://ecos.fws.gov/ecp/species/9410	Breeds Apr 1 to Jul 20
Olive-sided Flycatcher Contopus cooperi This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/3914	Breeds May 20 to Aug 31
Santa Barbara Song Sparrow Melospiza melodia graminea This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA https://ecos.fws.gov/ecp/species/5513	Breeds Mar 1 to Sep 5
Western Screech-owl Megascops kennicottii cardonensis This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA	Breeds Mar 1 to Jun 30

Probability of Presence Summary

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read "Supplemental Information on Migratory Birds and Eagles", specifically the FAQ section titled "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

Probability of Presence (■)

Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. (A year is represented as 12 4-week months.) A taller bar indicates a higher probability of species presence. The survey effort (see below) can be used to establish a level of confidence in the presence score. One can have higher confidence in the presence score if the corresponding survey effort is also high.

How is the probability of presence score calculated? The calculation is done in three steps:

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1. The probability of presence for each week is calculated as the number of survey events in the week where the species was detected divided by the total number of survey events for that week. For example, if in week 12 there were 20 survey events and the Spotted Towhee was found in 5 of them, the probability of presence of the Spotted Towhee in week 12 is 0.25.
2. To properly present the pattern of presence across the year, the relative probability of presence is calculated. This is the probability of presence divided by the maximum probability of presence across all weeks. For example, imagine the probability of presence in week 20 for the Spotted Towhee is 0.05, and that the probability of presence at week 12 (0.25) is the maximum of any week of the year. The relative probability of presence on week 12 is 0.25/0.25 = 1; at week 20 it is 0.05/0.25 = 0.2.
3. The relative probability of presence calculated in the previous step undergoes a statistical conversion so that all possible values fall between 0 and 10, inclusive. This is the probability of presence score.

To see a bar's probability of presence score, simply hover your mouse cursor over the bar.

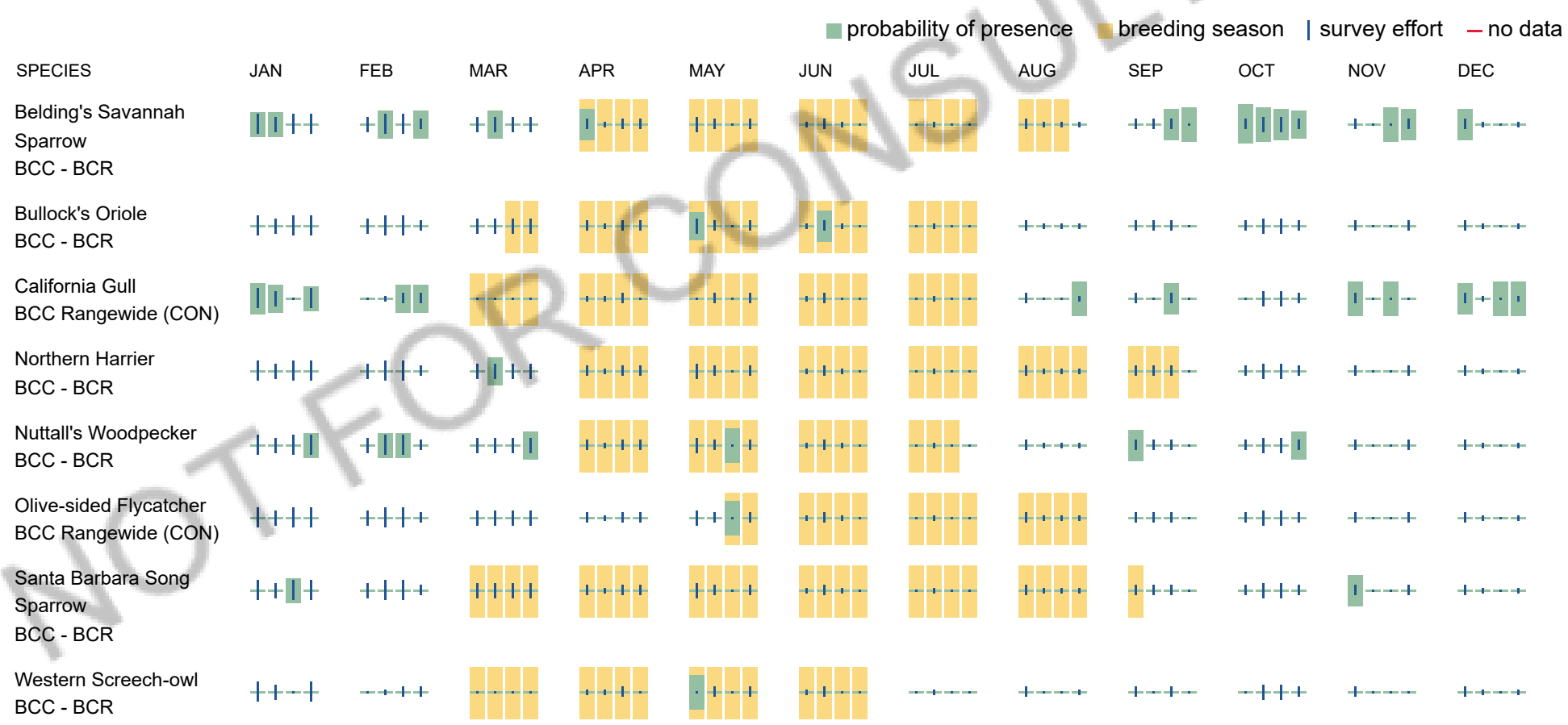
Breeding Season (▪)
Yellow bars denote a very liberal estimate of the time-frame inside which the bird breeds across its entire range. If there are no yellow bars shown for a bird, it does not breed in your project area.

Survey Effort (|)
Vertical black lines superimposed on probability of presence bars indicate the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps. The number of surveys is expressed as a range, for example, 33 to 64 surveys.

To see a bar's survey effort range, simply hover your mouse cursor over the bar.

No Data (–)
A week is marked as having no data if there were no survey events for that week.

Survey Timeframe
Surveys from only the last 10 years are used in order to ensure delivery of currently relevant information. The exception to this is areas off the Atlantic coast, where bird returns are based on all years of available data, since data in these areas is currently much more sparse.



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Migratory Bird FAQs

Tell me more about avoidance and minimization measures I can implement to avoid or minimize impacts to migratory birds.

Nationwide Avoidance & Minimization Measures for Birds describes measures that can help avoid and minimize impacts to all birds at any location year-round. When birds may be breeding in the area, identifying the locations of any active nests and avoiding their destruction is one of the most effective ways to minimize impacts. To see when birds are most likely to occur and breed in your project area, view the Probability of Presence Summary. Additional measures or permits may be advisable depending on the type of activity you are conducting and the type of infrastructure or bird species present on your project site.

What does IPaC use to generate the list of migratory birds that potentially occur in my specified location?

The Migratory Bird Resource List is comprised of Birds of Conservation Concern (BCC) and other species that may warrant special attention in your project location, such as those listed under the Endangered Species Act or the Bald and Golden Eagle Protection Act and those species marked as “Vulnerable”. See the FAQ “What are the levels of concern for migratory birds?” for more information on the levels of concern covered in the IPaC migratory bird species list.

The migratory bird list generated for your project is derived from data provided by the Avian Knowledge Network (AKN). The AKN data is based on a growing collection of survey, banding, and citizen science datasets and is queried and filtered to return a list of those birds reported as occurring in the 10km grid cell(s) with which your project intersects. These species have been identified as warranting special attention because they are BCC species in that area, an eagle (Bald and Golden Eagle Protection Act requirements may apply), or a species that has a particular vulnerability to offshore activities or development.

Again, the Migratory Bird Resource list includes only a subset of birds that may occur in your project area. It is not representative of all birds that may occur in your project area. To get a list of all birds potentially present in your project area, and to verify survey effort when no results present, please visit the Rapid Avian Information Locator (RAIL) Tool.

Why are subspecies showing up on my list?

Subspecies profiles are included on the list of species present in your project area because observations in the AKN for **the species** are being detected. If the species are present, that means that the subspecies may also be present. If a subspecies shows up on your list, you may need to rely on other resources to determine if that subspecies may be present (e.g. your local FWS field office, state surveys, your own surveys).

What does IPaC use to generate the probability of presence graphs for the migratory birds potentially occurring in my specified location?

The probability of presence graphs associated with your migratory bird list are based on data provided by the Avian Knowledge Network (AKN). This data is derived from a growing collection of survey, banding, and citizen science datasets.

Probability of presence data is continuously being updated as new and better information becomes available. To learn more about how the probability of presence graphs are produced and how to interpret them, go to the Probability of Presence Summary and then click on the "Tell me about these graphs" link.

How do I know if a bird is breeding, wintering, or migrating in my area?

To see what part of a particular bird's range your project area falls within (i.e. breeding, wintering, migrating, or resident), you may query your location using the RAIL Tool and view the range maps provided for birds in your area at the bottom of the profiles provided for each bird in your results. If a bird on your IPaC migratory bird species list has a breeding season associated with it (indicated by yellow vertical bars on the phenology graph in your “IPaC PROBABILITY OF PRESENCE SUMMARY” at the top of your results list), there may be nests present at some point within the timeframe specified. If "Breeds elsewhere" is indicated, then the bird likely does not breed in your project area.

What are the levels of concern for migratory birds?

Migratory birds delivered through IPaC fall into the following distinct categories of concern:

1. "BCC Rangewide" birds are Birds of Conservation Concern (BCC) that are of concern throughout their range anywhere within the USA (including Hawaii, the Pacific Islands, Puerto Rico, and the Virgin Islands);
2. "BCC - BCR" birds are BCCs that are of concern only in particular Bird Conservation Regions (BCRs) in the continental USA; and
3. "Non-BCC - Vulnerable" birds are not BCC species in your project area, but appear on your list either because of the Bald and Golden Eagle Protection Act requirements (for eagles) or (for non-eagles) potential susceptibilities in offshore areas from certain types of development or activities (e.g. offshore energy development or longline fishing).

Although it is important to avoid and minimize impacts to all birds, efforts should be made, in particular, to avoid and minimize impacts to the birds on this list, especially BCC species. For more information on avoidance and minimization measures you can implement to help avoid and minimize migratory bird impacts, please see the FAQ “Tell me more about avoidance and minimization measures I can implement to avoid or minimize impacts to migratory birds”.

Details about birds that are potentially affected by offshore projects

For additional details about the relative occurrence and abundance of both individual bird species and groups of bird species within your project area off the Atlantic Coast, please visit the Northeast Ocean Data Portal. The Portal also offers data and information about other taxa besides birds that may be helpful to you in your project review. Alternately, you may download the bird model results files underlying the portal maps through the NOAA NCCOS Integrative Statistical Modeling and Predictive Mapping of Marine Bird Distributions and Abundance on the Atlantic Outer Continental Shelf project webpage.

Proper interpretation and use of your migratory bird report

The migratory bird list generated is not a list of all birds in your project area, only a subset of birds of priority concern. To learn more about how your list is generated and see options for identifying what other birds may be in your project area, please see the FAQ "What does IPaC use to generate the migratory birds potentially occurring in my specified location". Please be aware this report provides the "probability of presence" of birds within the 10 km grid cell(s) that overlap your project; not your exact project footprint. On the graphs provided, please look carefully at the survey effort (indicated by the black vertical line) and for the existence of the "no data" indicator (a red horizontal line). A high survey effort is the key component. If the survey effort is high, then the probability of presence score can be viewed as more dependable. In contrast, a low survey effort bar or no data bar means a lack of data and, therefore, a lack of certainty about presence of the species. This list does not represent all birds present in your project area. It is simply a starting point for identifying what birds of concern have the potential to be in your project area, when they might be there, and if they might be breeding (which means nests might be present). The list and associated information help you know what to look for to confirm presence and helps guide implementation of avoidance and minimization measures to eliminate or reduce potential impacts from your project activities, should presence be confirmed. To learn more about avoidance and minimization measures, visit the FAQ "Tell me about avoidance and minimization measures I can implement to avoid or minimize impacts to migratory birds".

Interpreting the Probability of Presence Graphs
Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. A taller bar indicates a higher probability of species presence. The survey effort can be used to establish a level of confidence in the presence score.

How is the probability of presence score calculated? The calculation is done in three steps:
The probability of presence for each week is calculated as the number of survey events in the week where the species was detected divided by the total number of survey events for that week. For example, if in week 12 there were 20 survey events and the Spotted Towhee was found in 5 of them, the probability of presence of the Spotted Towhee in week 12 is 0.25.

To properly present the pattern of presence across the year, the relative probability of presence is calculated. This is the probability of presence divided by the maximum probability of presence across all weeks. For example, imagine the probability of presence in week 20 for the Spotted Towhee is 0.05, and that the probability of presence at week 12 (0.25) is the maximum of any week of the year. The relative probability of presence on week 12 is 0.25/0.25 = 1; at week 20 it is 0.05/0.25 = 0.2.

The relative probability of presence calculated in the previous step undergoes a statistical conversion so that all possible values fall between 0 and 10, inclusive. This is the probability of presence score.

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Breeding Season ()
Yellow bars denote a very liberal estimate of the time-frame inside which the bird breeds across its entire range. If there are no yellow bars shown for a bird, it does not breed in your project area.

Survey Effort ()
Vertical black lines superimposed on probability of presence bars indicate the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps.

No Data ()
A week is marked as having no data if there were no survey events for that week.

Survey Timeframe
Surveys from only the last 10 years are used in order to ensure delivery of currently relevant information. The exception to this is areas off the Atlantic coast, where bird returns are based on all years of available data, since data in these areas is currently much more sparse.

Facilities

National Wildlife Refuge lands

Any activity proposed on lands managed by the National Wildlife Refuge system must undergo a 'Compatibility Determination' conducted by the Refuge. Please contact the individual Refuges to discuss any questions or concerns.

There are no refuge lands at this location.

Fish hatcheries

There are no fish hatcheries at this location.

Wetlands in the National Wetlands Inventory (NWI)

Impacts to NWI wetlands and other aquatic habitats may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal statutes.

For more information please contact the Regulatory Program of the local U.S. Army Corps of Engineers District.

Wetland information is not available at this time

This can happen when the National Wetlands Inventory (NWI) map service is unavailable, or for very large projects that intersect many wetland areas. Try again, or visit the NWI map to view wetlands at this location.

Data limitations

The Service's objective of mapping wetlands and deepwater habitats is to produce reconnaissance level information on the location, type and size of these resources. The maps are prepared from the analysis of high altitude imagery. Wetlands are identified based on vegetation, visible hydrology and geography. A margin of error is inherent in the use of imagery; thus, detailed on-the-ground inspection of any particular site may result in revision of the wetland boundaries or classification established through image analysis.

The accuracy of image interpretation depends on the quality of the imagery, the experience of the image analysts, the amount and quality of the collateral data and the amount of ground truth verification work conducted. Metadata should be consulted to determine the date of the source imagery used and any mapping problems.

Wetlands or other mapped features may have changed since the date of the imagery or field work. There may be occasional differences in polygon boundaries or classifications between the information depicted on the map and the actual conditions on site.

Data exclusions

Certain wetland habitats are excluded from the National mapping program because of the limitations of aerial imagery as the primary data source used to detect wetlands. These habitats include seagrasses or submerged aquatic vegetation that are found in the intertidal and subtidal zones of estuaries and nearshore coastal waters. Some deepwater reef communities (coral or tuberficid worm reefs) have also been excluded from the inventory. These habitats, because of their depth, go undetected by aerial imagery.

Data precautions

Federal, state, and local regulatory agencies with jurisdiction over wetlands may define and describe wetlands in a different manner than that used in this inventory. There is no attempt, in either the design or products of this inventory, to define the limits of proprietary jurisdiction of any Federal, state, or local government or to establish the geographical scope of the regulatory programs of government agencies. Persons intending to engage in activities involving

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modifications within or adjacent to wetland areas should seek the advice of appropriate Federal, state, or local agencies concerning specified agency regulatory programs and proprietary jurisdictions that may affect such activities.

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ATTACHMENT B

SITE PHOTOS



Photo 1: View of H-Street project site. A line of Chinese pistache (*Pistacia chinensis*) trees is present on the north side of the lot.



Photo 2: View of H-Street project looking east. Landscaped shrubs are present along the fenceline separating the project site from the adjacent railroad corridor.

ATTACHMENT C

SPECIAL-STATUS SPECIES SUMMARY

Scientific Name Common Name	Status	Habitat Requirements	Potential to Occur	Rationale
Plants				
Caulanthus californicus California jewelflower	US: E CA: E CRPR: 1B.1	Annual herb; blooms February-May; chenopod scrub, pinyon and juniper woodland, valley and foothill grassland.	No	No suitable habitat
Castilleja campestris var. *succulenta* succulent owl's clover	US: T CA: — CRPR: 1B.2	Annual herb (hemiparasitic); blooms (March) April–May; vernal pools (often acidic).	No	No suitable habitat
Imperata brevifolia California satintail	US: — CA: — CRPR: 2B.1	Perennial rhizomatous herb; blooms September–May; chaparral, coastal scrub, meadows and seeps (often alkali), Mojavean desert scrub, riparian scrub.	No	No suitable habitat
Leptosiphon serrulatus Madera leptosiphon	US: — CA: — CRPR: 1B.2	Annual herb; blooms April–May; cismontane woodland, lower montane coniferous forest.	No	No suitable habitat
Sagittaria sanfordii Sanford's arrowhead	US: — CA: — CRPR: 1B.2	Perennial rhizomatous herb (emergent); blooms May–October (November); marshes and swamps (shallow freshwater).	No	No suitable habitat
Orcuttia inaequalis San Joaquin Valley Orcutt grass	US: T CA: E CRPR: 1B.1	Annual herb; blooms April–September; vernal pools.	No	No suitable habitat
Tuctoria greenei Greene's tuctoria	US: E CA: R CRPR: 1B.1	Annual herb; blooms May–July (September); vernal pools.	No	No suitable habitat
Invertebrates				
Branchinecta lynchi vernal pool fairy shrimp	US: T CA: —	Occur in a variety of vernal pool habitats that range from small, clear pools to large, turbid, and alkaline pools.	No	No suitable habitat

Scientific Name Common Name	Status	Habitat Requirements	Potential to Occur	Rationale
Amphibians				
Ambystoma californiense pop. 1 California tiger salamander—Central California DPS	US: T CA: T	Small salamander found in vernal and seasonal pools and associated grasslands, oak savanna and woodland, and coastal scrub in the Central Valley and along the Central Coast.	No	No suitable habitat
Spea hammondii western spadefoot	US: PT CA: SSC	Species relies on vernal pools for breeding where predators cannot become established and open areas with sand or gravelly soils in a variety of habitats: grasslands, coastal scrub, woodlands, chaparral, sandy washes, lowland river floodplains, alkali flats, foothills, and mountains.	No	No suitable habitat
Reptiles				
Anniella pulchra northern California legless lizard	US: — CA: SSC	Secretive fossorial lizard found in many habitats, especially valley and foothill grassland, chaparral, coastal scrub, and coastal dune; most commonly associated with moist sandy or loose organic soils with leaf litter.	No	No suitable habitat
Arizona elegans occidentalis California glossy snake	US: — CA: SSC	Scrub and grassland habitats, often with loose or sandy soils.	No	No suitable habitat
Gambelia silus [=sila] blunt-nosed leopard lizard	US: E CA: E, FP	Occurs in semiarid habitats within the southern Central Valley and Cuyama Valley; habitats typically are flat and have large open areas with scattered shrubs for refuge; uses small mammal burrows for shelter.	No	No suitable habitat
Phrynosoma blainvillii coast horned lizard	US: — CA: SSC	Prefers sandy/loose soils in grassland, forests, woodlands, and open chaparral.	No	No suitable habitat
Actinemys marmorata northwestern pond turtle	US: PT CA: SSC	Highly aquatic and diurnally active; found in ponds, lakes, rivers, streams, creeks, marshes, and irrigation ditches with vegetation and rocky/muddy bottom.	No	No suitable habitat
Birds				
Buteo swainsoni Swainson's hawk	US: — CA: T	Breeds in stands with few trees in juniper-sage flats, riparian areas, and oak savannahs, and along freeways; usually nests in scattered trees surrounded by foraging habitat; forages primarily for small mammals in grasslands and open desert scrublands or suitable grain fields or livestock pastures.	No	No suitable habitat

Scientific Name Common Name	Status	Habitat Requirements	Potential to Occur	Rationale
Mammals				
Dipodomys nitratoides exilis Fresno kangaroo rat	US: E CA: E	Occurs on alkali open grassland on bare alkaline clay-based soils; likely extirpated.	No	No suitable habitat
Antrozous pallidus pallid bat	US: — CA: SSC	Occurs in low elevations in deserts, grasslands, shrublands, woodlands, and forests; day roosts in caves, crevices, mines, and occasionally hollow trees and buildings; night roosts sometimes in more open areas.	No	No suitable habitat
Eumops perotis californicus western mastiff bat	US: — CA: SSC	Found in conifer and deciduous woodlands, coastal scrub, annual and perennial grassland, desert scrub, chaparral, palm oases, and urban habitats; roosts in crevices on cliff faces, high buildings, trees, and tunnels; needs vertical faces to drop off to take flight.	No	No suitable habitat
Vulpes macrotis mutica San Joaquin kit fox	US: E CA: T	Arid to semi-arid grasslands, open shrublands, savannahs, and grazed lands with loose-textured soils; highly adaptable and documented in urban developed areas; uses burrows year-round for shelter, escape from predators, and rearing young; will use man-made structures.	No	No suitable habitat

Sources: CDFW 2026a; CDFW 2026b; CNPS 2026; USFWS 2026; Zeiner et al. 1990.

Notes:

Status

E Listed as endangered
T Listed as threatened
PT Proposed Threatened
FP California Fully Protected
SSC California Species of Special Concern

CRPR: California Rare Plant Rank

1A Presumed Extinct in California
1B Rare, Threatened, or Endangered in California and elsewhere
2A Plants presumed extirpated in California, but more common elsewhere
2B Plants Rare, Threatened, or Endangered in California, but more common elsewhere

CRPR Threat Code Extension

.1 Seriously endangered in California (over 80% of occurrences threatened / high degree and immediacy of threat)
.2 Fairly endangered in California (20–80% occurrences threatened)
.3 Not very endangered in California (<20% of occurrences threatened)

CA = California
CDFW = California Department of Fish and Wildlife
CNPS = California Native Plant Society
DPS = distinct population segment
US = United States
USFWS = United States Fish and Wildlife Service

ATTACHMENT D

REFERENCES

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ATTACHMENT B

TRIP GENERATION ANALYSIS AND VEHICLE MILES TRAVELED SCREENING ANALYSIS MEMORANDUM

CARLSBAD
CLOVIS
IRVINE
LOS ANGELES
PALM SPRINGS
POINT RICHMOND
RIVERSIDE
ROSEVILLE
SAN LUIS OBISPO

MEMORANDUM

DATE: April 6, 2026

TO: Jill Gormley, Assistant Director of Public Works, City of Fresno

FROM: Ambarish Mukherjee, P.E., AICP; Principal, LSA Associates

SUBJECT: H-Street Parking Building Project Trip Generation Analysis and Vehicle Miles Traveled Screening Analysis Memorandum (LSA Project No. CFO2202.10)

LSA has prepared this Trip Generation Analysis and Vehicle Miles Traveled (VMT) Analysis Screening Memorandum (Memo) for the proposed H-Street Parking Building Project (project) in Fresno, California. The proposed project includes development of a 294,118-square-foot (sf), 7-level open air parking structure with 904 total parking spaces (147 stalls for future adjacent 293 multifamily residential project, 757 vehicular stall for commercial use, and 47 bicycle parking spaces) on an approximately 2.26-acre site located at the southwest corner of the intersection of H Street/Mono Street. The project site is located within the Downtown Community Plan Area and the Fulton Corridor Specific Plan. Vehicular access to the project would be provided via two driveways, one 2-lane full access driveway connecting to the intersection of Inyo Street/H-Street and another full-access driveway along Mono Street. The project would also install all-way stop control at the intersection of H Street/Mono Street.

Figure 1 illustrates the project site's location within the region. Figure 2 illustrates a conceptual site plan of the project. The project land uses are consistent with the City's General Plan land use and zoning designation.

The objectives of this Memo are as follows:

- To estimate the trip generation for the proposed project and determine whether a Levels of Service (LOS) based Traffic Impact Study (TIS) will be required for the project; and
- To determine whether the project will have any potential VMT impact.

TRIP GENERATION ANALYSIS

As previously stated, the project is development of a parking structure with 904 parking stalls. The purpose of the project would be to provide a consolidated vehicle parking facility for patrons coming to the Chukchansi Park stadium, or other downtown business and administration offices. In addition, this parking structure would also be a convenient location for California High Speed Rail, Fresno Station. As previously mentioned, part of the project's parking stalls would also be used for the nearby future multifamily residential project. Currently, these existing and future projects in the vicinity lack adequate parking facility, and the proposed project would alleviate this situation by providing additional parking facility, dedicated to patrons travelling to downtown Fresno.

As such, the project does not include any land uses that could be considered as a stand-alone trip generator. Rather, the project will support multiple existing and planned development land uses identified in the vicinity as part of the Fulton Corridor Specific Plan, event parking for Chukchansi Park, and High-Speed Rail Station. Therefore, this project, by itself would not be responsible for any significant trip generation. Rather, it would only consolidate the existing inbound and outbound patron trips for the land uses in the vicinity from other places, and streetside or surface parking to this dedicated parking facility.

It should be noted that individual land use projects, that are estimated to utilize this proposed project, will be required to be evaluated separately for their land use and trip generation estimate. As such, this project does not account for the trip generation for those projects but would rather facilitate those projects by developing a consolidated parking structure to be utilized by these projects.

Though the project is not estimated to generate any new patron trips, as a conservative estimate it could be assumed that the project would generate two trips per day for maintenance and garbage collection purposes. Typically, such maintenance and garbage collection trips occur during off-peak hours for such facilities. As such, it could be estimated that the project would generate four (4) new daily trips (two inbound and two outbound), and no new a.m. or p.m. peak hour trips.

The requirement of a TIS or LOS analysis is typically derived from the individual jurisdictions' general plan circulation and mobility element, which includes goals and policies related to regional transportation efficiency and LOS standards. Therefore, the City's General Plan Policy document (*City of Fresno General Plan*, adopted December 2014), was reviewed to determine the goals and policy-based recommendations.

The City's Mobility and Circulation Policy MT-2-I is the principal determinant policy for requirement of a TIS. As recommended in Policy MT-2-I, the requirement of TIS is dependent on the project's location in the types of Traffic Impact Zones (TIZ) and number of peak hour trips. As such, the following are the TIS peak hour trip and LOS standard requirements for all four types of TIZ:

- **TIZ I**: Downtown Planning Area: Maintain a peak hour LOS standard of F and better for intersections and roadway segments. Projects with 200 or more peak hour trips would require a TIS.

- **TIZ II**: Currently Developed and Encourage Infill: Maintain a peak hour LOS standard of E and better for intersections and roadway segments. Projects with 200 or more peak hour trips would require a TIS. Per Figure MT-4 of the City's General Plan Mobility and Circulation element, the TDSP is within TIZ II, and the specific plan update would be required to follow these thresholds.

- **TIZ III**: Areas adjacent to City boundaries but within Sphere of Influence: Maintain a peak hour LOS standard of D and better for intersections and roadway segments. Projects with more than 100 peak hour trips would require a TIS.

- **TIZ IV**: Southern Employment Areas within and planned by the City: Maintain a peak hour LOS standard of E and better for intersections and roadway segments. Projects with 200 or more peak hour trips would require a TIS.

As previously noted, the project is located within TIZ I. It is acknowledged in the City's General Plan that the LOS within the downtown could deteriorate to LOS F. Additionally, the proposed project is anticipated to generate nominal new trips, which is not anticipated to increase the amount of traffic within the downtown area during peak hours. As such, the project itself would not be generating any new peak hour trips, which is less than the 200 peak hour trip threshold requirement for TIS or detailed LOS analysis for a project within TIZ I. Therefore, given the nominal number of new trips the project is anticipated to generate by itself, per the City's General Plan goals and policies, no further LOS analysis will be required.

VEHICLE MILES TRAVELED ANALYSIS

Background

On December 28, 2018, the California Office of Administrative Law cleared the revised CEQA guidelines for use. Among the changes to the guidelines was removal of vehicle delay and level of service from consideration under CEQA. With the adopted CEQA guidelines, transportation impacts are to be evaluated based on project generated VMT.

As mentioned above, the project is located within the jurisdiction of City of Fresno. Currently, the City follows the *Fresno County SB 743 Implementation Regional Guidelines* (Fresno COG Guidelines) updated July 2025. As such, the Fresno COG Guidelines were used for this analysis.

Project Screening Determination

The Fresno COG Guidelines provides multiple screening criteria for land use projects as well as transportation projects. Given the project includes construction of a parking structure as well as installing an all-way stop sign at H/Street/Mono Street, both components were evaluated separately for the project's VMT impact determination. Therefore, the project components were compared with the screening criteria established in the "Project Screening" section of the VMT Guidelines to check if the project can be screened out. Following is a brief description about the project in relation with the project screening criteria:

Parking Facility Component

The Parking facility component of the project was evaluated with the land use project screening criteria included in the VMT Guidelines as follows:

- **Project Located in a High-Quality Transit Area (HQTA):** The project is not a land use to use this criterion; therefore, this screening criteria does not apply to the project.

- **Local-Serving Retail:** The project is not a retail development. Therefore, this screening criteria does not apply to the project.

- **Other Local-Serving Uses:** The project does not include any daycare centers, student housing projects on or adjacent to a college/university and is not classified as a local park; therefore, this screening criteria does not apply to the project.

- **Provision of Affordable Housing:** The project is not an affordable housing project. Therefore, this screening criteria does not apply to the project.

- **Redevelopment Project:** The project could be classified as a redevelopment project of the existing surface parking lot. However, given the proposed project would include more parking than the existing parking lot, this screening criteria may not apply to the project.

- **Project Located in Low VMT Area:** The project is not a land use to use this criterion; therefore, this criterion does not apply to the project.

- **Small Project:** The Fresno COG Guidelines state that projects generating less than 500 daily trips could be screened out of detailed VMT analysis. As discussed in the project trip generation analysis section, the project is estimated to generate nominal daily trips (up to four daily trips). Therefore, the project does satisfy this screening criteria and is eligible to be screened out from a detailed VMT analysis.

- **Institutional/government and Public Service:** The project could not be classified as an institutional and/or public service use. As such, this screening criteria does not apply to the project.

All-Way Stop Sign Component

The All-Way Stop Sign component of the proposed project was evaluated with the transportation project screening criteria included in the Fresno COG Guidelines, and it satisfies the following screening criteria for transportation projects:

- Rehabilitation, maintenance, replacement, safety, and repair projects designed to improve the condition of existing transportation assets (e.g., highways; roadways; bridges; culverts; Transportation Management System field elements such as cameras, message signs, detection, or signals; tunnels; transit systems; and assets that serve bicycle and pedestrian facilities) and that do not add additional motor vehicle capacity. and

- Installation, removal, or reconfiguration of traffic control devices, including Transit Signal Priority (TSP) features

As such, both project components are eligible to be screened out for CEQA VMT evaluation purposes. Therefore, the entire project is not estimated to have any significant VMT impact, and therefore, would be eligible from any further detailed VMT analysis.

CONCLUSION

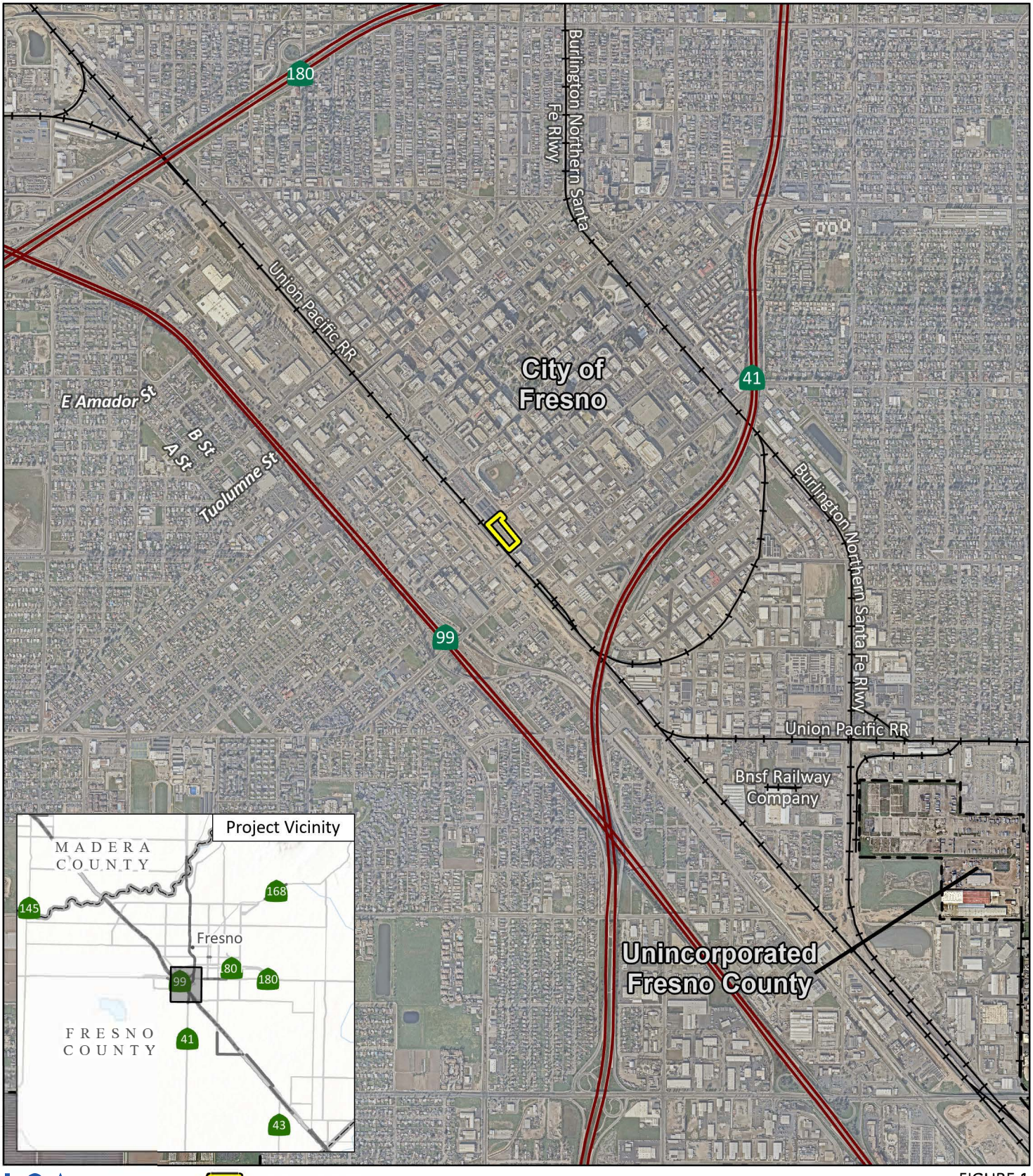
Based on the project description, the proposed project is estimated to generate nominal new trips by itself. Therefore, as per City's General Plan, the project may not require any further LOS based

analysis. Similarly, as per the City's VMT Guidelines, the proposed project's components are presumed to have a less than significant VMT impact and therefore are eligible to be screened out. As such, the entire project is anticipated to have a less than significant VMT impact and therefore is eligible to be screened out from further analysis.

Should you have any questions, please do not hesitate to contact me at (951) 781-9310 or email me at Ambarish.Mukherjee@lsa.net.

ATTACHMENTS

Figure 1: Regional and Project Location
Figure 2: Conceptual Site Plan



LSA

Project Location

FIGURE 1

N

0 1000 2000
FEET

SOURCE: Nearmap (2/08/2026)

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H-Street Parking Building Project
Trip Generation and Vehicle Miles Travel Analysis Memorandum
Regional and Project Location

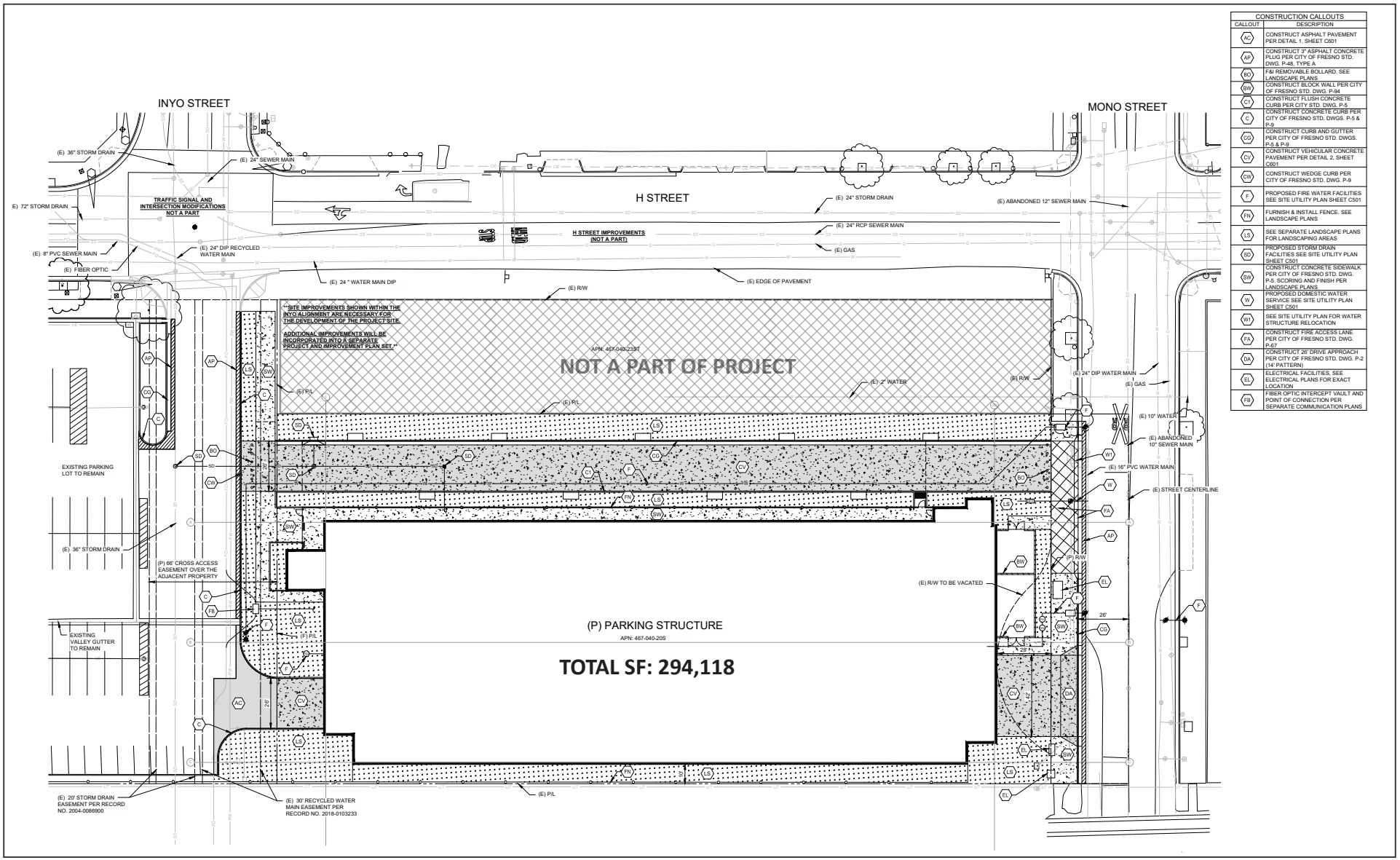


FIGURE 2

LSA

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SOURCE: CPC

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H-Street Parking Building Project
Trip Generation and Vehicle Miles Traveled Analysis Memorandum

Conceptual Site Plan

ATTACHMENT C

NOISE AND VIBRATION IMPACT TECHNICAL MEMORANDUM

CARLSBAD
CLOVIS
EMERYVILLE
IRVINE
LOS ANGELES
PALM SPRINGS
RIVERSIDE
ROSEVILLE
SAN LUIS OBISPO

MEMORANDUM

DATE: April 29, 2026

TO: Kimberly Alvarado Vega
Utilities and On Site Project Management, Capital Projects Department
City of Fresno

FROM: J.T. Stephens, Executive Vice President
Moe Abushanab, Noise Engineer

SUBJECT: Noise and Vibration Impact Technical Memorandum for the proposed H Street Parking Building Project in Fresno, California

INTRODUCTION AND PROJECT DESCRIPTION

This Noise and Vibration Impact Technical Memorandum has been prepared to evaluate the potential impacts associated with the proposed H Street Parking Building Project in Fresno, California. This memorandum is intended to satisfy the City of Fresno (City) requirements for a project-specific noise and vibration impact analysis and examines the impacts to the surrounding noise-sensitive uses with the incorporation of, if necessary, project design features and standard conditions. Future noise level impacts are based on the noise measurement data gathered in the vicinity of the project site (from March 11, 2026, to March 12, 2026) and calculated stationary source noise levels to properly account for the impacts associated with the proposed project.

Location and Description

The project includes development of a 294,118-square-foot (sf), 7-level open air parking structure with 904 total parking spaces on a 2.26-acre site (project site). The project site is located within the Downtown Core (DTC) base zoning district and has a land use designation of Downtown Core (DTC). The project site is located within the Downtown Community Plan Area and the Fulton Corridor Specific Plan. The project site is comprised of two parcels (Assessor's Parcel Numbers [APNs] 467-040-20S and 467-040-22S) and is located southwest of the intersection of H Street and Mono Street. In addition, the project includes vacation of a small portion of Mono Street to facilitate the construction of the proposed parking building. Surrounding land uses include Chukchansi Park to the north; surface parking with solar carports to the northwest; a dirt lot to the northeast; the railroad tracks to the south, southwest, and southeast; and commercial uses to southeast. The proposed project is assumed to operate continuously throughout the week.

Construction of the project would include the demolition of the existing development on-site, with the exception of a portion of an existing drive aisle on-site (extending from Inyo Street) and two

existing street trees, one located at the southwestern corner of the H Street and Mono Street intersection and the other located at the southwestern corner of the H Street and Inyo Street intersection. Figures 1 and 2 (all figures provided in Attachment B) show the project location and site plan, respectively.

METHODOLOGY

The evaluation of noise impacts associated with the proposed project includes the following:

- A determination of the short-term construction noise and vibration levels at off-site noise-sensitive uses and comparison to the City's General Plan and Municipal Code Ordinance requirements;
- A determination of the long-term noise levels at off-site noise-sensitive uses as well as the proposed project and comparison of those levels to the City's pertinent noise standards; and
- If necessary, a determination of required noise reduction measures (e.g., noise barriers) to reduce long-term noise impacts from all sources.

CHARACTERISTICS OF SOUND

Noise is usually defined as unwanted sound. Noise consists of any sound that may produce physiological or psychological damage and/or interfere with communication, work, rest, recreation, and sleep.

To the human ear, sound has two significant characteristics: pitch and loudness. Pitch is generally an annoyance, while loudness can affect the ability to hear. Pitch is the number of complete vibrations, or cycles per second, of a wave resulting in the tone's range from high to low. Loudness is the strength of a sound that describes a noisy or quiet environment and is measured by the amplitude of the sound wave. Loudness is determined by the intensity of the sound waves combined with the reception characteristics of the human ear. Sound intensity refers to how hard the sound wave strikes an object, which in turn produces the sound's effect. This characteristic of sound can be precisely measured with instruments. The analysis of a project defines the noise environment of the project area in terms of sound intensity and its effect on adjacent sensitive land uses.

Measurement of Sound

Sound intensity is measured through the A-weighted scale 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 (e.g., inches or pounds), decibels are measured on a logarithmic scale representing points on a sharply rising curve.

For example, 10 decibels (dB) is 10 times more intense than 1 dB, 20 dB is 100 times more intense than 1 dB, and 30 dB is 1,000 times more intense than 1 dB. Thirty decibels (30 dB) represents 1,000 times as much acoustic energy as 1 dB. The decibel scale increases as the square of the change, representing the sound pressure energy. A sound as soft as human breathing is about

10 times greater than 0 dB. The decibel system of measuring sound gives a rough connection between the physical intensity of sound and its perceived loudness to the human ear. A 10 dB increase in sound level is perceived by the human ear as only a doubling of the loudness of the sound. Ambient sounds generally range from 30 dB (very quiet) to 100 dB (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. For a single-point source, sound levels decrease approximately 6 dB for each doubling of distance from the source. This drop-off rate is appropriate for noise generated by stationary equipment. If noise is produced by a line source (e.g., highway traffic or railroad operations), the sound decreases 3 dB for each doubling of distance in a hard site environment. Similarly, line sources with intervening absorptive vegetation or line sources that are located at a great distance to the receptor would decrease 4.5 dB for each doubling of distance.

There are many ways to rate noise for various time periods, but an appropriate rating of ambient noise affecting humans also accounts for the annoying effects of sound. The equivalent continuous sound level (L_{eq}) is the total sound energy of time-varying noise over a sample period. However, the predominant rating scales for human communities in the State of California are the L_{eq} and Community Noise Equivalent Level (CNEL) or the day-night average noise level (L_{dn}) based on A weighted decibels (dBA). CNEL is the time-varying noise over a 24-hour period, with a 5 dBA weighting factor applied to the hourly L_{eq} for noises occurring from 7:00 p.m. to 10:00 p.m. (defined as relaxation hours), and a 10 dBA weighting factor applied to noises occurring from 10:00 p.m. to 7:00 a.m. (defined as sleeping hours). L_{dn} is similar to the CNEL scale but without the adjustment for events occurring during the evening hours. CNEL and L_{dn} are within 1 dBA of each other and are normally interchangeable. The City uses the L_{dn} noise scale for long-term noise impact assessment.

Noise impacts can be described in three categories. The first category is audible impacts that refer to increases in noise levels noticeable to humans. Audible increases in noise levels generally refer to a change of 3 dB or greater because this level has been found to be barely perceptible in exterior environments. The second category, potentially audible, refers to a change in the noise level between 1 dB and 3 dB. This range of noise levels has been found to be noticeable only in laboratory environments. The last category is changes in noise levels of less than 1 dB, which are inaudible to the human ear. Only audible changes in existing ambient or background noise levels are considered potentially significant.

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 the entire system, with prolonged noise exposure in excess of 75 dBA increasing body tensions, thereby affecting blood pressure and functions of the heart and the nervous system. In comparison, extended periods of noise exposure above 90 dBA would result in permanent cell 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. This is called the threshold of pain. A sound level of 160–165 dBA will result in dizziness or loss of

equilibrium. The ambient or background noise problem is widespread and generally more concentrated in urban areas than in outlying less developed areas.

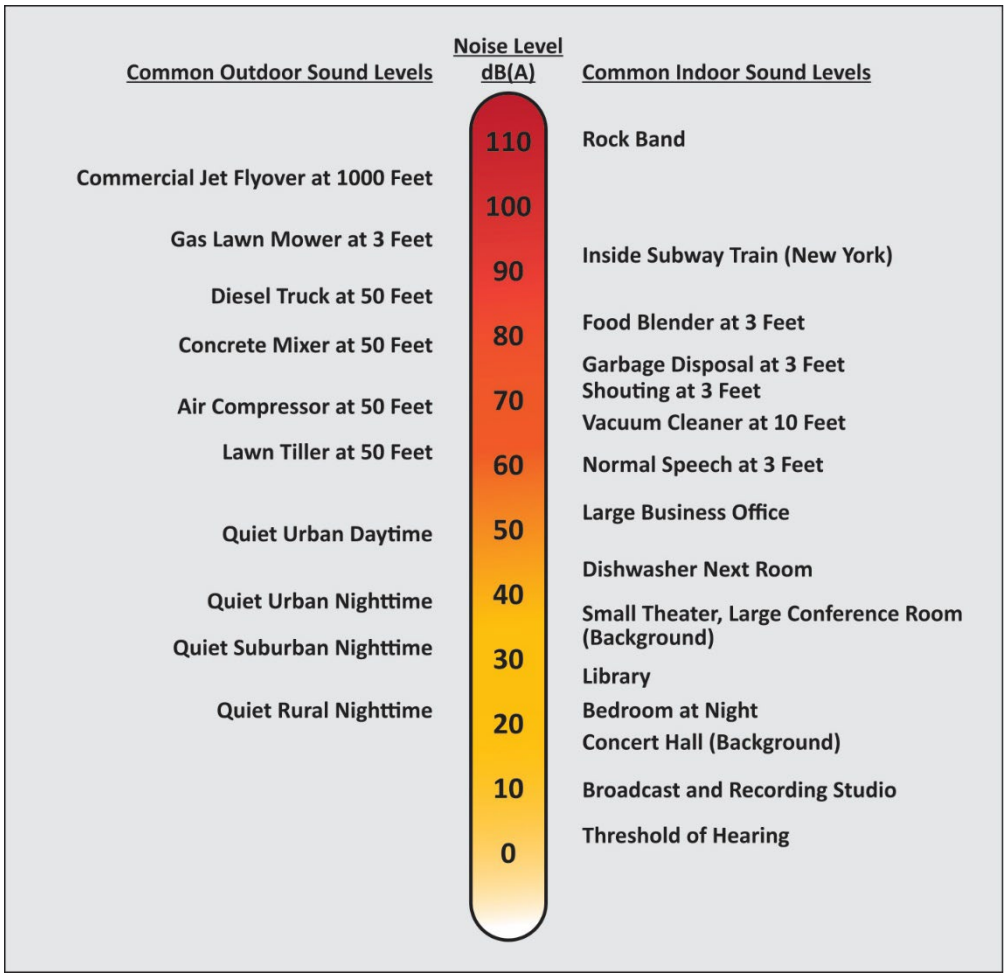
Table A lists full definitions of acoustical terms, and Table B shows common sound levels and their sources.

Table A: Definitions of Acoustical Terms

Term	Definitions
Decibel, dB	A unit of level that denotes the ratio between two quantities proportional to power, the number of decibels is 10 times the logarithm (to the base 10) of this ratio.
Frequency, Hz	Of a function periodic in time, the number of times that the quantity repeats itself in one second (i.e., number of cycles per second).
A-Weighted Sound Level, dBA	The sound level obtained by use of A-weighting. The A-weighting filter deemphasizes the very low and very high frequency components of the sound in a manner similar to the frequency components of the sound in a manner similar to the frequency response of the human ear and correlates well with subjective reactions to noise. All sound levels in this assessment are A-weighted, unless reported otherwise.
L_{01}, L_{10}, L_{50}, L_{90}	The fast A-weighted noise levels equaled or exceeded by a fluctuating sound level for 1 percent, 10 percent, 50 percent, and 90 percent of a stated time period.
Equivalent Continuous Noise Level, L_{eq}	The level of a steady sound that, in a stated time period and at a stated location, has the same A-weighted sound energy as the time varying sound.
Community Noise Equivalent Level, CNEL	The 24-hour A-weighted average sound level from midnight to midnight, obtained after the addition of 5 dB to sound levels occurring in the evening from 7:00 p.m. to 10:00 p.m. and after the addition of 10 dB to sound levels occurring in the night between 10:00 p.m. and 7:00 a.m.
Day/Night Noise Level, L_{dn}	The 24-hour A-weighted average sound level from midnight to midnight, obtained after the addition of 10 dB to sound levels occurring in the night between 10:00 p.m. and 7:00 a.m.
L_{max}, L_{min}	The maximum and minimum A-weighted sound levels measured on a sound level meter, during a designated time interval, using fast time averaging.
Ambient Noise Level	The all-encompassing noise associated with a given environment at a specified time, usually a composite of sound from many sources at many directions, near and far; no particular sound is dominant.

Source: Caltrans *Technical Noise Supplement to the Traffic Noise Analysis Protocol* (Caltrans 2013), Federal Transit Administration's (FTA) *Transit Noise and Vibration Impact Assessment Manual* (2018).

Table B: Common Sound Levels and Noise Sources



Source: LSA (2016).

CHARACTERISTICS OF VIBRATION

Vibration refers to ground-borne noise and perceptible motion. Ground-borne vibration is almost exclusively a concern inside buildings and is rarely perceived as a problem outdoors, where the motion may not be discernible. Typically, there is more adverse reaction to effects associated with the shaking of a building. Vibration energy propagates from a source through intervening soil and rock layers to the foundations of nearby buildings. The vibration then propagates from the foundation throughout the remainder of the structure. Building vibration may be perceived by occupants as the motion of building surfaces, the rattling of items on shelves or hanging on walls, or a low-frequency rumbling noise. The rumbling noise is caused by the vibration of walls, floors, and ceilings that radiate sound waves.

Typical sources of ground-borne vibration are construction activities (e.g., blasting, pile driving, and operating heavy-duty earthmoving equipment), steel-wheeled trains, and occasional traffic on rough roads. Problems with both ground-borne vibration and noise from these sources are usually localized to areas within approximately 100 ft of the vibration source, although there are examples of ground-borne vibration causing interference out to distances greater than 200 ft (FTA 2018). When roadways are smooth, vibration from traffic, even heavy trucks, is rarely perceptible. It is assumed for most projects that the roadway surface will be smooth enough that ground-borne vibration from street traffic will not exceed the impact criteria; however, the construction of the project could result in ground-borne vibration that may be perceptible.

Ground-borne vibration has the potential to damage buildings. Although it is very rare for typical construction activities to cause even cosmetic building damage, it is not uncommon for construction processes such as blasting and pile driving to cause vibration of sufficient amplitudes to damage nearby buildings (FTA 2018). Ground-borne vibration that may result in damage is usually measured in terms of peak particle velocity (PPV).

APPLICABLE NOISE STANDARDS

The applicable noise standards governing the project site include the criteria in the Safety and Noise Element of the City's General Plan (Noise Element), and the City of Fresno Municipal Code.

City of Fresno

General Plan

The City's General Plan (2014) includes a set of policies (detailed below) and programs that form a blueprint for the physical development of the city. The following policies related to noise and applicable to the proposed project are presented in the Noise Element of the General Plan. In addition, the Noise Element sets noise standards for transportation and stationary noise sources as shown in Table C and Table D, below.

Table C: Transportation (Non-Aircraft) Noise Sources

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

Source: General Plan (City of Fresno, 2014).

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

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

CNEL = Community Noise Equivalent Level

dB = decibels

L_{dn} = day-night average noise level

Table D: Stationary Noise Sources

	Daytime (7:00 a.m. – 10:00 p.m.)	Nighttime (10:00 p.m. to 7:00 a.m.)
Hourly Equivalent Sound Level (L_{eq}), dBA	50	45
Maximum Sound Level (L_{max}), dBA	70	60

Source: General Plan (City of Fresno, 2014).

[1] The Planning and Development Director, on a case-by-case basis, may designate land uses other than those shown in this table to be noise-sensitive, and may require appropriate noise mitigation measures.

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

dB = decibels

dBA = A-weighted decibels

- **Policy NS-1-j: Significance Threshold.** Establish, as a threshold of significance for the City's environmental review process, that a significant increase in ambient noise levels is assumed if the project would increase noise levels in the immediate vicinity by 3 dB L_{dn} or CNEL or more above the ambient noise limits established in this General Plan Update.

- **Policy NS-1-m: Transportation Related Noise Impacts.** For projects subject to City approval, require that the project sponsor mitigate noise created by new transportation and transportation-related stationary noise sources, including roadway improvement projects, so that resulting noise levels do not exceed the City's adopted standards for noise-sensitive land uses.

- **Policy NS-1-o: Sound Wall Guidelines.** Acoustical studies and noise mitigation measures for projects shall specify the heights, materials, and design for sound walls and other noise barriers. Aesthetic considerations shall also be addressed in these studies and mitigation measures such as variable noise barrier heights, a combination of a landscaped berm with wall, and reduced barrier height in combination with increased distance or elevation differences between noise source and noise receptor, with a maximum allowable height of 15 feet. The City will develop guidelines for aesthetic design measures of sound walls, and may commission area wide noise mitigation studies that can serve as templates for acoustical treatment that can be applied to similar situations in the urban area.

Municipal Code

Section 10-109(a) of the City Municipal Code (2026) limits construction, repair, or remodeling work accomplished pursuant to a building, electrical, plumbing, mechanical, or other construction permit issued by the City or other governmental agency, or to site preparation and grading to between the hours of 7:00 a.m. and 10:00 p.m. on any day except Sunday.

Section 10-101 of the City's Municipal Code[1] contains the City's Noise Ordinance, which establishes excessive noise guidelines and exemptions. Standards are set for ambient noise based on district type (residential, commercial, and industrial) and time of day. Assumed, ambient noise levels for noise sensitive residential uses during daytime, evening, and nighttime hours are 60 dBA L_{eq}, 55 dBA L_{eq}, and 55 dBA L_{eq}, respectively.

Section 15-2507 of the City Municipal Code (2026) states that no vibration shall be produced that is transmitted through the ground and is discernible without the aid of instruments by a reasonable person at the lot lines of the site. Vibrations from temporary construction, demolition, and vehicles that enter and leave the subject parcel (construction equipment, trains, trucks, etc.) are exempt from this standard.

Federal Transit Administration

Although the City does not have daytime construction noise level limits for activities that occur within the specified hours in Section 10-109 (a) to determine potential California Environmental Quality Act (CEQA) noise impacts, construction noise was assessed using criteria from the *Transit Noise and Vibration Impact Assessment Manual* (FTA 2018) (FTA Manual). Table E shows the Federal Transit Administration's (FTA) Detailed Assessment Construction Noise Criteria based on the composite noise levels per construction phase.

Table E: General Assessment Daytime Construction Noise Criteria

Land Use	Daytime 1-hour L_{eq} (dBA)
Residential	80
Commercial	85
Industrial	90

Source: *Transit Noise and Vibration Impact Assessment Manual* (FTA 2018).
dBA = A-weighted decibels
L_{eq} = equivalent continuous sound level

APPLICABLE VIBRATION STANDARDS

California Department of Transportation

Vibration standards included in the California Department of Transportation's (Caltrans) *Transportation and Construction Vibration Guidance Manual* (Caltrans Manual) (2020) are used in this analysis for ground-borne vibration impacts on human annoyance and building damage. The criteria for environmental impact from ground-borne vibration are based on the maximum levels for a single event and the RMS vibration level. Table F provides the criteria for assessing the potential for interference or annoyance from vibration levels in a building.

[1] Fresno, City of, 2019. *Fresno, California – Code of Ordinances*. May 21.

Table F: Construction Vibration Annoyance Criteria

Human Response	Vibration Level (RMS in/sec)
Barely perceptible	0.01
Distinctly perceptible	0.04
Strongly perceptible	0.10
Severe	0.40

Source: *Transportation and Construction Vibration Guidance Manual* (Caltrans 2020).
Caltrans = California Department of Transportation RMS = root-mean-square
in/sec = inch/inches per second

Table G lists the potential vibration building damage criteria associated with construction activities, as suggested in the Caltrans Manual. Caltrans guidelines show that a vibration level of up to 0.5 in/sec in PPV is considered safe for newer residential structures and modern industrial or commercial buildings and would not result in any construction vibration damage.

Table G: Construction Vibration Damage Criteria

Structure / Condition	PPV (in/sec)
Extremely fragile historic buildings, ruins, ancient monuments	0.08
Fragile buildings	0.10
Historic and some old buildings	0.25
Older residential structures	0.30
New residential structures	0.50
Modern industrial / commercial buildings	0.50

Source: *Transportation and Construction Vibration Guidance Manual,* Table 19 (Caltrans 2020).
Caltrans = California Department of Transportation PPV = peak particle velocity
in/sec = inch/inches per second

OVERVIEW OF THE EXISTING NOISE ENVIRONMENT

The primary existing noise sources in the project area are from traffic on H Street and Mono Street. To assess the existing noise conditions in the area, long-term noise measurements were conducted at the project site. Two long-term, 24-hour measurements were taken from March 11, 2026, to March 12, 2026. The locations of the noise measurements are shown on Figure 3, and the results are summarized in Table H. The results on the noise monitoring indicate that average daytime and nighttime hourly levels are higher than the City's assumed ambient levels. Noise measurement data are provided in Attachment C of this analysis.

Table H: Existing Noise Level Measurements

Location Number	Location Description	Noise Levels (dBA L_{eq})		Day-night Noise Levels (L_{dn})	Primary Noise Sources
		Daytime[1]	Nighttime[2]		
LT-1	On a light pole along the center of the project site, approximately 25 ft from the H Street centerline and approximately 270 ft from the Mono Street centerline.	61.1-67.6	57.8-68.0	70.8	Traffic on H Street
LT-2	On a utility pole along the southeastern portion of the project site, approximately 30 ft from the Mono Street centerline and 200 ft from the H Street centerline.	59.8-64.6	56.4-65.2	68.6	Traffic on Mono Street

Source: Compiled by LSA (2026).
[1] Daytime Noise Levels = noise levels during the hours of 7:00 a.m. to 10:00 p.m.
[2] Nighttime Noise Levels = noise levels during the hours of 10:00 p.m. to 7:00 a.m.
L_{dn} = day-night noise level dBA = A-weighted decibels
L_{eq} = equivalent continuous sound level

Sensitive Land Uses in the Project Vicinity

Certain land uses are considered more sensitive to noise than others are. Examples of these include residential areas, educational facilities, hospitals, childcare facilities, and senior housing. The project site is surrounded primarily by commercial or industrial uses.

The closest sensitive receptors to the project site are the residences to the southwest, approximately 615 feet from the project boundary.

PROJECT IMPACT ANALYSIS

The proposed project would result in short-term construction noise and vibration impacts and long-term mobile source noise and vibration impacts as described below.

Short-Term Construction-Related Impact Analysis

Project construction would result in short-term noise and vibration. Maximum construction noise would be short-term, generally intermittent depending on the construction phase, and variable depending on receiver distance from the active construction zone. The duration of various types of construction noise and vibration would vary from one day to several weeks depending on the phase of construction. The levels and types of impacts that may occur during construction are described below.

Construction Noise Analysis

Two types of short-term noise would occur during project construction, including: (1) equipment delivery and construction worker commutes; and (2) project construction operations.

The first type of short-term construction noise would result from the transport of construction equipment and materials to the project site and construction worker commutes. These transportation activities would incrementally raise noise levels on access roads leading to the site.

Although there would be a relatively high single-event noise exposure potential causing intermittent noise nuisance (passing trucks at 50 ft would generate up to 84 dBA L_{max}), the effect on longer-term ambient noise levels would be small when compared to the existing average daily traffic (ADT) volume on H Street or Mono Street. The results of the California Emissions Estimator Model (CalEEMod) for the proposed project indicate that during the building construction phase, an additional 683 acoustically equivalent trips would occur during an average day from worker and delivery activities. Because the existing traffic volume on these roads are considerably more than 683 vehicles, construction-related vehicle trips would not approach existing daily traffic volume, and traffic noise would not increase by 3 dBA L_{dn}. A noise level increase of less than 3 dBA would not be perceptible to the human ear in an outdoor environment. Therefore, short-term, construction-related impacts associated with worker commute and equipment transport to the project site would be less than significant.

The second type of short-term noise impact is related to noise generated during demolition, grading, building construction, architectural coating, and paving on the project site. Construction is undertaken in discrete steps, each of which has its own mix of equipment, and consequently, its own noise characteristics. These various sequential phases would change the character of the noise generated on the project site. Therefore, the noise levels vary as construction progresses. Despite the variety in the type and size of construction equipment, similarities in the dominant noise sources and patterns of operation allow construction-related noise ranges to be categorized by work phase. Table I lists the maximum noise levels recommended for noise impact assessments for typical construction equipment based on a distance of 50 ft between the construction equipment and a noise receptor. Typical operating cycles for these types and pieces of construction equipment may involve 1–2 minutes of full power operation followed by 3–4 minutes at lower power settings.

In addition to the reference maximum noise level, the usage factor provided in Table I is used to calculate the hourly noise level impact for each piece of equipment based on the following equation:

$$L_{eq}(equip) = E.L. + 10\log(U.F.) - 20\log\left(\frac{D}{50}\right)$$

where: $L_{eq}(equip)$ = L_{eq} at a receiver resulting from the operation of a single piece of equipment over a specified time period.

E.L. = noise emission level of the particular piece of equipment at a reference distance of 50 ft.

U.F. = usage factor that accounts for the fraction of time that the equipment is in use over the specified period of time.

D = distance from the receiver to the piece of equipment.

Each piece of construction equipment operates as an individual point source. Using the following equation, a composite noise level can be calculated when multiple sources of noise operate simultaneously:

$$Leq\ (composite) = 10 * \log_{10}\left(\sum_{1}^{n} 10^{\frac{Ln}{10}}\right)$$

Using the equations from the methodology above, the reference information in Table I, and the construction equipment list provided, the composite noise level of each construction phase was calculated. The project construction composite noise levels at a distance of 50 ft would range from 74 dBA L_{eq} to 88 dBA L_{eq}, with the highest noise levels occurring during the demolition phase.

Table I: Typical Construction Equipment Noise Levels

Equipment Description	Acoustical Usage Factor (%)[1]	Maximum Noise Level (L_{max}) at 50 Ft[2]
Auger Drill Rig	20	84
Backhoes	40	80
Compactor (ground)	20	80
Compressor	40	80
Cranes	16	85
Dozers	40	85
Dump Trucks	40	84
Excavators	40	85
Flat Bed Trucks	40	84
Forklift	20	85
Front-end Loaders	40	80
Graders	40	85
Impact Pile Drivers	20	95
Jackhammers	20	85
Paver	50	77
Pickup Truck	40	55
Pneumatic Tools	50	85
Pumps	50	77
Rock Drills	20	85
Rollers	20	85
Scrapers	40	85
Tractors	40	84
Trencher	50	80
Welder	40	73

Source: *FHWA Roadway Construction Noise Model User's Guide*, Table 1 (FHWA 2006).
Note: Noise levels reported in this table are rounded to the nearest whole number.

1 Usage factor is the percentage of time during a construction noise operation that a piece of construction equipment is operating at full power.

2 Maximum noise levels were developed based on Specification 721.560 from the Central Artery/Tunnel program to be consistent with the City of Boston's Noise Code for the "Big Dig" project.

FHWA = Federal Highway Administration
ft = foot/feet
L_{max} = maximum instantaneous sound level

Once composite noise levels are calculated, reference noise levels can then be adjusted for distance using the following equation:

$$Leq\ (at\ distance\ X) = Leq\ (at\ 50\ feet) - 20 * \log_{10}\left(\frac{X}{50}\right)$$

In general, this equation shows that doubling the distance would decrease noise levels by 6 dBA, while halving the distance would increase noise levels by 6 dBA.

Table J shows the nearest sensitive uses to the project site, their distance from the center of construction activities, and composite noise levels expected during construction. These noise level projections do not consider intervening topography or barriers. Construction equipment calculations are provided in Attachment D.

Table J: Potential Construction Noise Impacts at Nearest Receptor

Receptor (Location)	Composite Noise Level (dBA L_{eq}) at 50 ft[1]	Distance (ft)	Composite Noise Level (dBA L_{eq})
Commercial Uses (South)	88	335	71
Commercial Uses (East)		375	70
Stadium (North)		490	68
Commercial Uses (West)		550	67
Residential Uses (Southwest)		800	63

Source: Compiled by LSA (2026).

[1] The composite construction noise level represents the demolition phase, which is expected to result in the greatest noise level as compared to other phases.

dBA = A-weighted decibels

ft = foot/feet

L_{eq} = equivalent continuous sound level

While construction noise will vary, it is expected that composite noise levels during construction at the nearest off-site commercial uses to the south would reach an average noise level of 71 dBA L_{eq} and 63 dBA L_{eq} at the nearest sensitive uses to the southwest during daytime hours. These predicted noise levels would only occur when all construction equipment is operating simultaneously and, therefore, these levels are assumed to be rather conservative in nature. While construction-related short-term noise levels have the potential to be higher than existing ambient noise levels in the project area under existing conditions, the noise impacts would no longer occur once project construction is completed.

As stated above, noise impacts associated with construction activities are regulated by the City's Municipal Code. The proposed project would comply with the construction hours specified in the City's Noise Ordinance, which states that construction activities are allowed between the hours of 7:00 a.m. and 10:00 p.m. on any day other than Sundays, where no construction activities are allowed.

As it relates to off-site uses, construction-related noise impacts would remain below the 80 dBA L_{eq} construction noise level criteria, as established by the FTA for residential land uses for the average daily condition as modeled from the center of the project site and therefore would be considered less than significant.

Construction Vibration Analysis

This construction vibration impact analysis discusses the level of human annoyance using vibration levels in RMS and assesses the potential for building damages using vibration levels in PPV (in/sec).

This is because vibration levels calculated in RMS are best for characterizing human response to building vibration, and vibration level in PPV is best for characterizing the potential for damage.

Table K shows the PPV and RMS values at 25 feet from the construction vibration source. As shown in Table K, bulldozers, and other heavy-tracked construction equipment (expected to be used for this project) generate approximately 0.089 PPV in/sec or 0.062 RMS in/sec of ground-borne vibration when measured at 25 feet, based on the Caltrans Manual. The distance to the nearest buildings for vibration impact analysis is measured between the nearest off-site buildings, and the project construction boundary (assuming the construction equipment would be used at or near the project setback line).

Table K: Vibration Source Amplitudes for Construction Equipment

Equipment	Reference PPV/L_V at 25 ft	
	PPV (in/sec)	RMS (in/sec)[1]
Pile Driver (Impact), Typical	0.644	0.451
Pile Driver (Sonic), Typical	0.170	0.119
Vibratory Roller	0.210	0.147
Hoe Ram	0.089	0.062
Large Bulldozer[2]	**0.089**	**0.062**
Caisson Drilling	0.089	0.062
Loaded Trucks[2]	**0.076**	**0.053**
Jackhammer	0.035	0.025
Small Bulldozer	0.003	0.002

Source: *Transit Noise and Vibration Impact Assessment Manual* (FTA 2018).

[1] RMS vibration velocity is 70 percent of maximum PPV

[2] Equipment shown in **bold** is expected to be used on site.

Caltrans = California Department of Transportation
ft = foot/feet
in/sec = inch/inches per second
L_V = velocity in decibels
PPV = peak particle velocity
RMS = root-mean-square

The formula for vibration transmission is provided below, and Tables L and M, below, provide a summary of off-site construction vibration levels. The material dampening coefficient, 'n', ranges between 1.1 and 1.5 depending on soil type and distance from equipment.

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

As previously shown in Table F, the threshold at which vibration levels would result in annoyance would be 0.04 in/sec RMS. Based on the information provided in Table L, vibration levels are expected to approach 0.0013 in/sec RMS at the closest receptors and would not exceed the annoyance thresholds.

Based on the information provided in Table M, vibration levels are expected to approach 0.018 PPV in/sec at the nearest surrounding structures and would remain below the Caltrans threshold of 0.5 in/sec PPV for building damage as shown in Table G. Vibration levels associated with smaller equipment would be substantially lower than the heavy equipment analyzed. Therefore,

construction would not result in any vibration annoyance or damage, and impacts would be less than significant.

Table L: Potential Construction Vibration Annoyance Impacts at Nearest Receptor

Receptor (Location)	Reference Vibration Level (RMS in/sec) at 25 ft[1]	Distance (ft)[2]	Vibration Level (RMS in/sec)
Commercial Uses (South)	0.062	335	0.0013
Commercial Uses (East)		375	0.0011
Stadium (North)		490	0.0007
Commercial Uses (West)		550	0.0006
Residential Uses (Southwest)		800	0.0003

Source: Compiled by LSA (2026).

[1] The reference vibration level is associated with a large bulldozer, which is expected to be representative of the heavy equipment used during construction.

[2] The assessment distance is associated with the average condition, identified by the distance from the center of construction activities to surrounding uses.

ft = foot/feet

in/sec = inches per second

RMS = root-mean-square

Table M: Potential Construction Vibration Damage Impacts at Nearest Receptor

Receptor (Location)	Reference Vibration Level (PPV) at 25 ft[1]	Distance (ft)[2]	Vibration Level (PPV)
Commercial Uses (South)	0.089	105	0.018
Commercial Uses (East)		235	0.008
Stadium (North)		245	0.007
Commercial Uses (West)		425	0.004
Residential Uses (Southwest)		615	0.003

Source: Compiled by LSA (2026).

[1] The reference vibration level is associated with a large bulldozer, which is expected to be representative of the heavy equipment used during construction.

[2] The assessment distance is associated with the peak condition, identified by the distance from the perimeter of construction activities and incorporating the project design features to surrounding structures.

ft = foot/feet

PPV = peak particle velocity

Long-Term Off-Site Traffic Noise Impact Analysis

Based on the project's Trip Generation Analysis and Vehicle Miles Traveled Screening Analysis Memorandum (LSA 2026), the project is anticipated to generate 4 new patron trips. Therefore, the project would not be responsible for any significant trip generation, and the traffic noise increase along the roadways in the vicinity of the project would be less than significant. No mitigation is required.

ATTACHMENT A

REFERENCES

California Department of Transportation (Caltrans). 2013. *Technical Noise Supplement to the Traffic Noise Analysis Protocol.* September.

City of Fresno. 2014. *City of Fresno General Plan.*

_____. 2026. *Municipal Code*. Website: https://library.municode.com/ca/fresno/codes/code_of_ordinances (accessed April 2026).

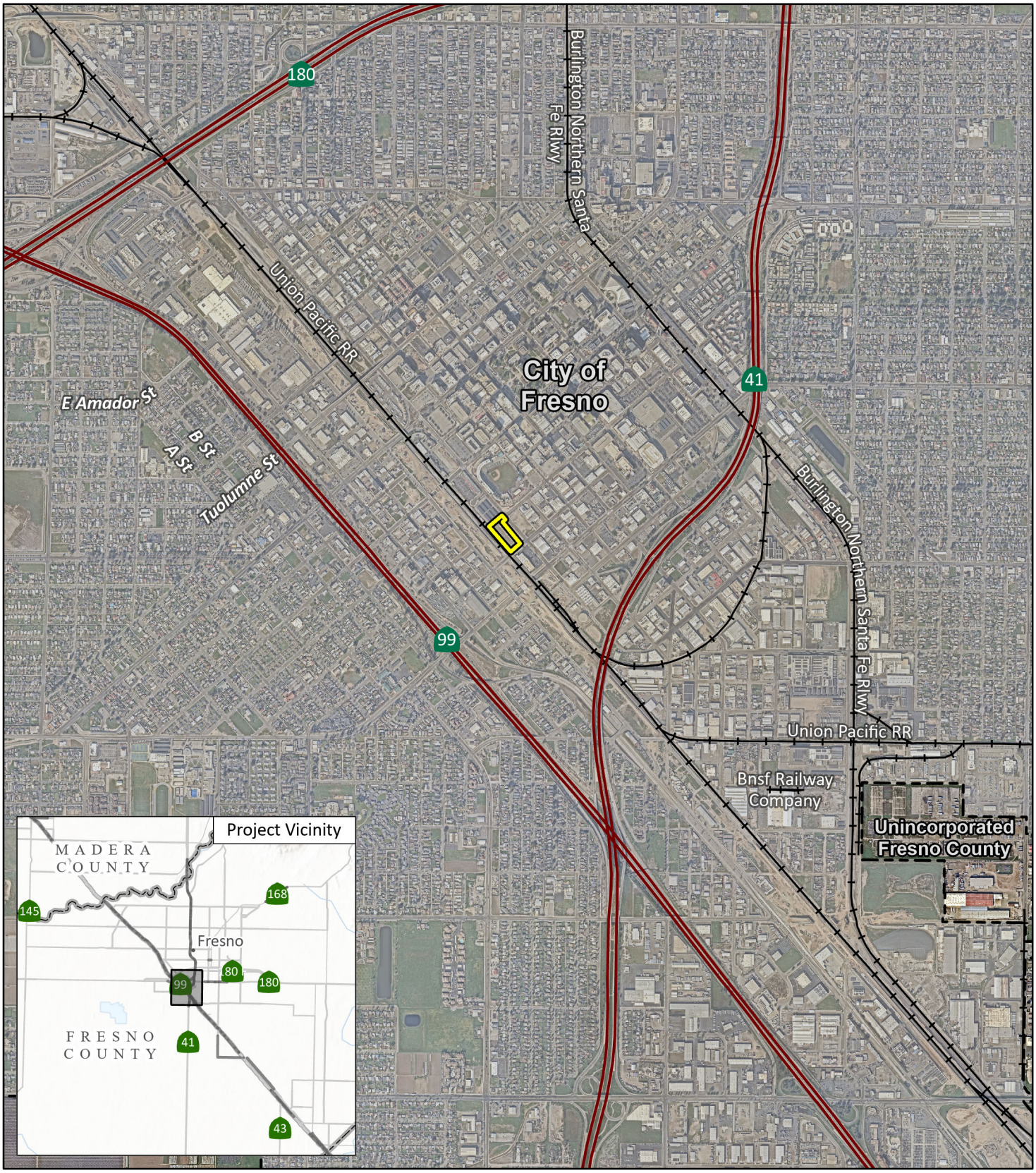
Federal Transit Administration (FTA). 2018. *Transit Noise and Vibration Impact Assessment Manual*. Office of Planning and Environment. Report No. 0123. September.

LSA Associates Inc. (LSA). 2026. H-*Street Parking Building Project Trip Generation Analysis and Vehicle Miles Traveled Screening Analysis Memorandum*. April 6.

ATTACHMENT B

FIGURES

Figure 1: Project Location
Figure 2: Site Plan
Figure 3: Noise Monitoring Locations



LSA

Project Location

FIGURE 1

N

0 1000 2000

FEET

SOURCE: Nearmap (2/08/2026)

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3/20/2026 11:39 AM

Class 32 Categorical Exemption for the H-Street Parking Building Project

Project Location

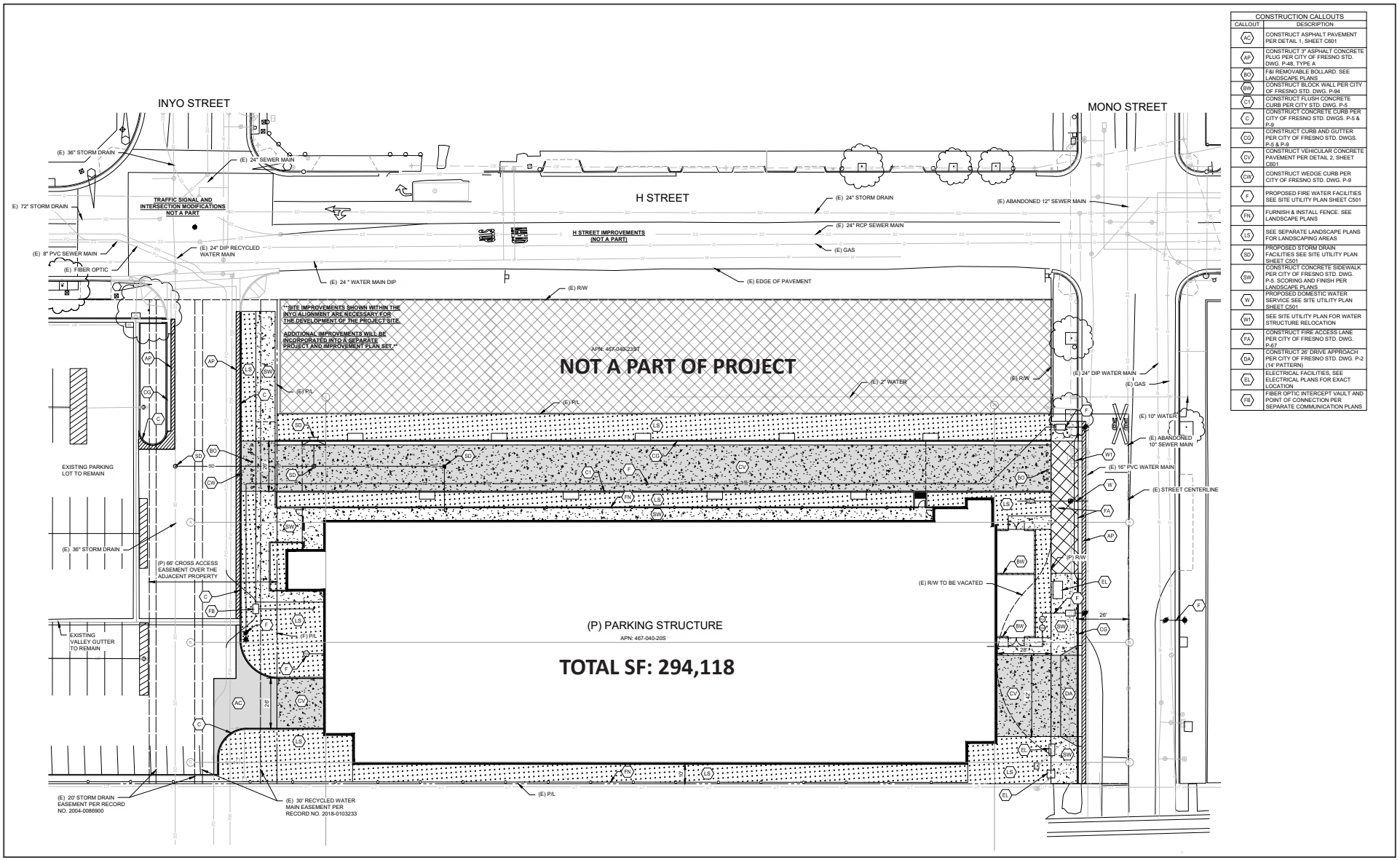


FIGURE 2

LSA

0 40 80
FEET

SOURCE: CPC

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Class 32 Categorical Exemption for the H-Street Parking Building Project

Conceptual Site Plan



LSA

Project Location

Noise Monitoring Location

FIGURE 3

N

0 75 150

FEET

Class 32 Categorical Exemption for the H-Street Parking Building Project

Noise Monitoring Locations

SOURCE: U.S. Census Bureau (USCB), Microsoft, Vantor, Nearmap (2/8/2026)

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ATTACHMENT C

NOISE MEASUREMENT DATA

Noise Measurement Survey – 24 HR

Project Number: CFO2202.10
Project Name: H Street Parking Garage

Test Personnel: Ben Gold
Equipment: LD Spark 706RC (SN: 18907)

Site Number: LT-1 Start Date: 3/11/2026

Time: From 12:00 p.m. To 11:00 a.m.

Site Location: On a light pole overlooking H Street, approximately 25 ft from the centerline.

Primary Noise Sources: Traffic noise from H Street and freight train noise from nearby tracks.

Comments:

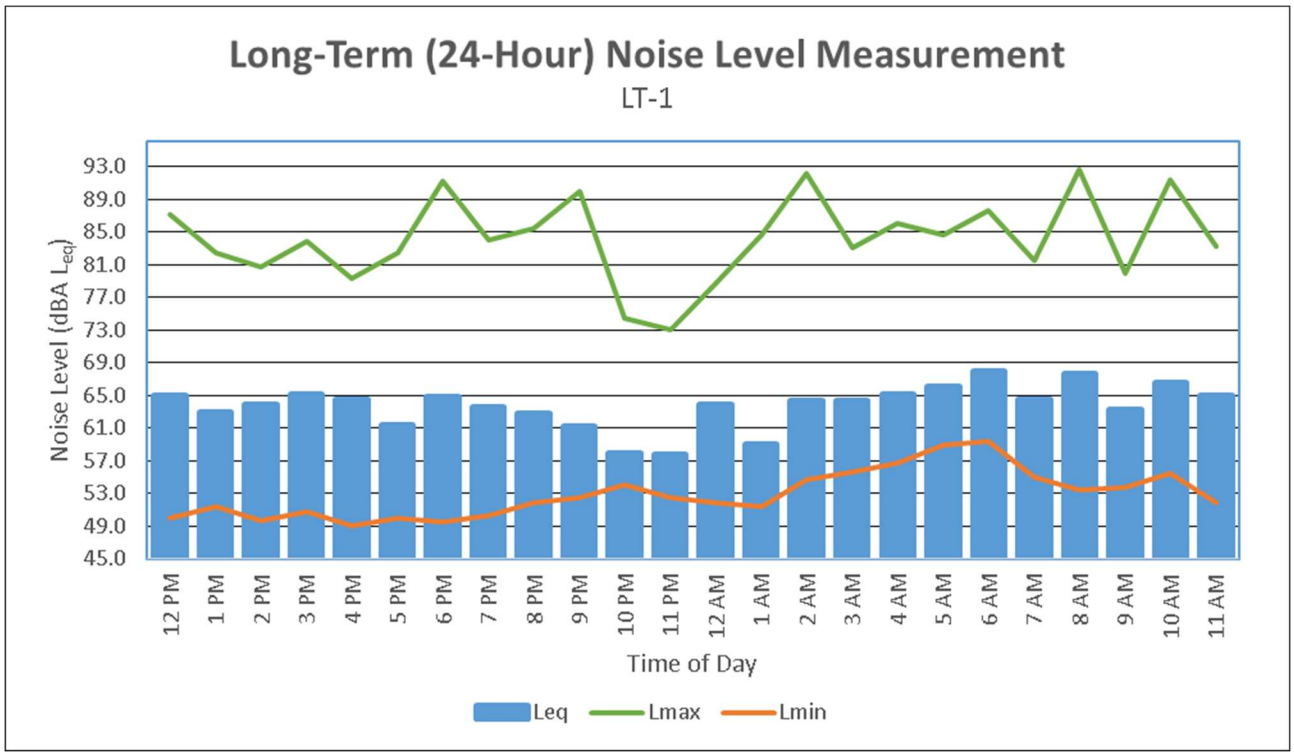
Photo:



Long-Term (24-Hour) Noise Level Measurement Results at LT-1

Start Time	Date	Noise Level (dBA)		
		L_{eq}	L_{max}	L_{min}
12:00 PM	3/11/2026	64.9	87.1	50.0
1:00 PM	3/11/2026	63.0	82.4	51.3
2:00 PM	3/11/2026	63.9	80.7	49.6
3:00 PM	3/11/2026	65.0	83.8	50.7
4:00 PM	3/11/2026	64.4	79.3	49.0
5:00 PM	3/11/2026	61.3	82.4	49.9
6:00 PM	3/11/2026	64.7	91.2	49.5
7:00 PM	3/11/2026	63.6	84.0	50.3
8:00 PM	3/11/2026	62.7	85.4	51.9
9:00 PM	3/11/2026	61.1	90.0	52.5
10:00 PM	3/11/2026	58.0	74.5	54.0
11:00 PM	3/11/2026	57.8	73.0	52.5
12:00 AM	3/12/2026	63.8	78.6	51.8
1:00 AM	3/12/2026	59.0	84.6	51.4
2:00 AM	3/12/2026	64.2	92.1	54.6
3:00 AM	3/12/2026	64.3	83.1	55.6
4:00 AM	3/12/2026	65.1	86.1	56.7
5:00 AM	3/12/2026	66.1	84.6	58.9
6:00 AM	3/12/2026	68.0	87.6	59.3
7:00 AM	3/12/2026	64.4	81.5	55.0
8:00 AM	3/12/2026	67.6	92.7	53.4
9:00 AM	3/12/2026	63.2	79.9	53.7
10:00 AM	3/12/2026	66.5	91.4	55.5
11:00 AM	3/12/2026	65.0	83.2	51.9

Source: Compiled by LSA Associates, Inc. (2026).
dBA = A-weighted decibel
L_{eq} = equivalent continuous sound level
L_{max} = maximum instantaneous noise level
L_{min} = minimum measured sound level



Noise Measurement Survey – 24 HR

Project Number: CFO2202.10
Project Name: H Street Parking Garage

Test Personnel: Ben Gold
Equipment: LD Spark 706RC (SN: 17119)

Site Number: LT-2 Start Date: 3/11/2026

Time: From 12:00 p.m. To 11:00 a.m.

Site Location: On a utility pole overlooking Mono Street, approximately 30 ft from the centerline.

Primary Noise Sources: Traffic noise from Mono Street and freight train noise.

Comments:

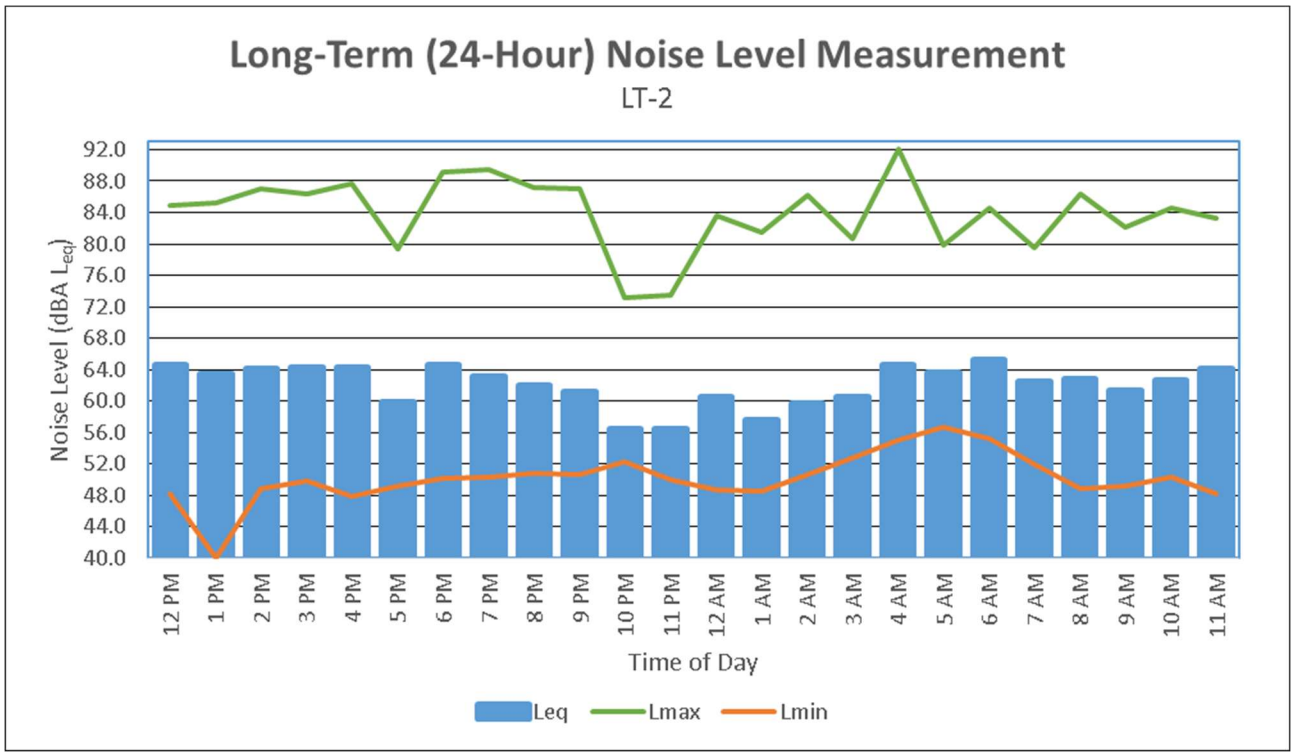
Photo:



Long-Term (24-Hour) Noise Level Measurement Results at LT-2

Start Time	Date	Noise Level (dBA)		
		L_{eq}	L_{max}	L_{min}
12:00 PM	3/11/2026	64.6	84.9	48.1
1:00 PM	3/11/2026	63.5	85.2	40.1
2:00 PM	3/11/2026	64.1	87.0	48.8
3:00 PM	3/11/2026	64.3	86.3	49.8
4:00 PM	3/11/2026	64.3	87.7	47.9
5:00 PM	3/11/2026	59.8	79.3	49.1
6:00 PM	3/11/2026	64.6	89.2	50.2
7:00 PM	3/11/2026	63.1	89.4	50.3
8:00 PM	3/11/2026	62.0	87.2	50.8
9:00 PM	3/11/2026	61.2	87.0	50.7
10:00 PM	3/11/2026	56.4	73.2	52.2
11:00 PM	3/11/2026	56.4	73.5	49.9
12:00 AM	3/12/2026	60.4	83.6	48.6
1:00 AM	3/12/2026	57.6	81.5	48.5
2:00 AM	3/12/2026	59.7	86.2	50.6
3:00 AM	3/12/2026	60.4	80.6	52.8
4:00 AM	3/12/2026	64.6	92.0	55.0
5:00 AM	3/12/2026	63.6	79.8	56.7
6:00 AM	3/12/2026	65.2	84.6	55.2
7:00 AM	3/12/2026	62.5	79.5	52.0
8:00 AM	3/12/2026	62.8	86.4	48.9
9:00 AM	3/12/2026	61.4	82.1	49.2
10:00 AM	3/12/2026	62.6	84.5	50.3
11:00 AM	3/12/2026	64.1	83.3	48.1

Source: Compiled by LSA Associates, Inc. (2026).
dBA = A-weighted decibel
L_{eq} = equivalent continuous sound level
L_{max} = maximum instantaneous noise level
L_{min} = minimum measured sound level



ATTACHMENT D

CONSTRUCTION NOISE CALCULATIONS

Construction Calculations

Phase: Demolition

Equipment	Quantity	Reference (dBA) 50 ft Lmax	Usage Factor[1]	Distance to Receptor (ft)	Ground Effects	Noise Level (dBA) Lmax	Noise Level (dBA) Leq
Dozer	1	82	40	50	0.5	82	78
Concrete Saw	1	90	20	50	0.5	90	83
Excavator	1	81	40	50	0.5	81	77
Tractor	3	84	40	50	0.5	84	85
					Combined at 50 feet	**91**	**88**
					Combined at Receptor 335 feet	**75**	**71**
					Combined at Receptor 375 feet	**74**	**70**
					Combined at Receptor 490 feet	**72**	**68**
					Combined at Receptor 550 feet	**71**	**67**
					Combined at Receptor 800 feet	**67**	**63**

Phase: Site Preparation

Equipment	Quantity	Reference (dBA) 50 ft Lmax	Usage Factor[1]	Distance to Receptor (ft)	Ground Effects	Noise Level (dBA) Lmax	Noise Level (dBA) Leq
Grader	1	85	40	50	0.5	85	81
Tractor	1	84	40	50	0.5	84	80
					Combined at 50 feet	**88**	**84**
					Combined at Receptor 335 feet	**71**	**67**
					Combined at Receptor 375 feet	**70**	**66**
					Combined at Receptor 490 feet	**68**	**64**

Phase: Grading

Equipment	Quantity	Reference (dBA) 50 ft Lmax	Usage Factor[1]	Distance to Receptor (ft)	Ground Effects	Noise Level (dBA) Lmax	Noise Level (dBA) Leq
Grader	1	85	40	50	0.5	85	81
Dozer	1	82	40	50	0.5	82	78
Tractor	2	84	40	50	0.5	84	83
					Combined at 50 feet	**89**	**86**
					Combined at Receptor 335 feet	**72**	**69**
					Combined at Receptor 375 feet	**71**	**68**
					Combined at Receptor 490 feet	**69**	**66**

Phase:Building Construction

Equipment	Quantity	Reference (dBA) 50 ft Lmax	Usage Factor[1]	Distance to Receptor (ft)	Ground Effects	Noise Level (dBA) Lmax	Noise Level (dBA) Leq
Man Lift	2	75	20	50	0.5	75	71
Welder / Torch	3	74	40	50	0.5	74	75
Crane	1	81	16	50	0.5	81	73
Pumps	1	81	50	50	0.5	81	78
Drum Mixer	1	80	50	50	0.5	80	77
Generator	1	81	50	50	0.5	81	78
Tractor	1	84	40	50	0.5	84	80
					Combined at 50 feet	**89**	**85**
					Combined at Receptor 335 feet	**72**	**69**

Phase: Paving

Equipment	Quantity	Reference (dBA) 50 ft Lmax	Usage Factor[1]	Distance to Receptor (ft)	Ground Effects	Noise Level (dBA) Lmax	Noise Level (dBA) Leq
Paver	1	77	50	50	0.5	77	74
Drum Mixer	1	80	50	50	0.5	80	77
All Other Equipment > 5 HP	1	85	50	50	0.5	85	82
Roller	2	80	20	50	0.5	80	76
Tractor	1	84	40	50	0.5	84	80
					Combined at 50 feet	**87**	**83**
					Combined at Receptor 335 feet	**70**	**67**

Phase:Architectural Coating

Equipment	Quantity	Reference (dBA) 50 ft Lmax	Usage Factor[1]	Distance to Receptor (ft)	Ground Effects	Noise Level (dBA) Lmax	Noise Level (dBA) Leq
Compressor (air)	1	78	40	50	0.5	78	74
					Combined at 50 feet	**78**	**74**
					Combined at Receptor 335 feet	**61**	**57**

Sources: RCNM

[1]- Percentage of time that a piece of equipment is operating at full power.

dBA – A-weighted Decibels

Lmax- Maximum Level

Leq- Equivalent Level

ATTACHMENT D

AIR QUALITY AND GREENHOUSE GAS EMISSIONS TECHNICAL MEMORANDUM

CARLSBAD
CLOVIS
EMERYVILLE
IRVINE
LOS ANGELES
PALM SPRINGS
RIVERSIDE
ROSEVILLE
SAN LUIS OBISPO

MEMORANDUM

DATE: April 28, 2026

TO: Kimberly Alvarado Vega
Utilities and On-Site Project Management, Capital Projects Department
City of Fresno

FROM: Briette Shea, Senior Air Quality Specialist

SUBJECT: Air Quality and Greenhouse Gas Emissions Technical Memorandum for the Proposed H Street Parking Building Project in Fresno, California

INTRODUCTION

LSA has prepared this Air Quality and Greenhouse Gas Emissions Technical Memorandum to evaluate the impacts associated with construction and operation of the proposed H Street Parking Building Project (proposed project) located in Fresno, California. This analysis was prepared using methods and assumptions recommended in the San Joaquin Valley Air Pollution Control District's (SJVAPCD) *Guidance for Assessing and Mitigating Air Quality Impacts* (GAMAQI).[1] This analysis includes a description of the existing regulatory framework, an assessment of project construction and operation-period air pollutant emissions, and an assessment of greenhouse gas (GHG) emissions resulting from the proposed project.

PROJECT LOCATION AND DESCRIPTION

The 2.26-acre project site, identified by Assessor's Parcel Numbers 467-040-20S and 467-040-22S, is located southwest of the intersection of H Street and Mono Street in Fresno, California. The project site is located within the Downtown Core (DTC) base zoning district and has a land use designation of DTC. The project site is located within the Downtown Community Plan Area and the Fulton Corridor Specific Plan. Surrounding land uses include Chukchansi Park to the north; surface parking with solar carports to the northwest; a dirt lot to the northeast; the railroad tracks to the south, southwest, and southeast; and commercial uses to southeast.

The proposed project includes development of the project site with a 294,118-square-foot (sf), seven-level open-air parking structure with 904 total parking spaces. In addition, the project includes vacation of a small portion of Mono Street to facilitate the construction of the proposed parking building. Of the total parking spaces, 757 spaces are intended to service nearby commercial land

[1] San Joaquin Valley Air Pollution Control District (SJVAPCD). 2015. *Guidance for Assessing and Mitigating Air Quality Impacts*. March 19. Website: https://www.valleyair.org/media/g4nl3p0g/gamaqi.pdf (accessed April 2026).

uses and 147 are intended to service nearby residential land uses. A total of 47 bicycle parking spaces would be provided, as well as 210 electric vehicle (EV) charging spaces.

Construction of the project would include demolition of the existing development on site, with the exception of a portion of an existing drive aisle on site (extending from Inyo Street) and two existing street trees.

EXISTING SENSITIVE RECEPTOR LOCATIONS IN THE PROJECT AREA

For the purposes of this analysis, sensitive receptors are parts of the population who have an increased sensitivity to air pollution or environmental contaminants. Sensitive receptor locations include residences, schools, daycare centers, hospitals, parks, and similar uses that are sensitive to air quality. Impacts on sensitive receptors are of particular concern because they are the population most vulnerable to the effects of air pollution. The closest sensitive receptors to the project site are the residences to the southwest, approximately 615 feet from the project boundary.

ENVIRONMENTAL SETTING

Air Quality

Air quality is a function of both local climate and local sources of air pollution. The amount of a given pollutant in the atmosphere is determined by the amount of the pollutant released and the atmosphere's ability to transport and dilute the pollutant. The major determinants of transport and dilution are wind, atmospheric stability, terrain, and, for photochemical pollutants, sunshine.

The project site is located within the San Joaquin Valley Air Basin (SJVAB) and is under the jurisdiction of the SJVAPCD. A region's topographic features have a direct correlation with air pollution flow and therefore are used to determine the boundaries of air basins. The SJVAB consists of approximately 25,000 square miles and covers eight counties, including Fresno, Kings, Madera, Merced, San Joaquin, Stanislaus, and Tulare counties, as well as the western portion of Kern County. The SJVAB is defined by the Sierra Nevada mountains in the east (8,000 to 14,000 feet in elevation), the Coast Ranges in the west (averaging 3,000 feet in elevation), and the Tehachapi Mountains in the south (6,000 to 8,000 feet in elevation). The valley is basically flat with a slight downward gradient to the northwest. The valley opens to the sea at the Carquinez Straits, where the San Joaquin-Sacramento Delta empties into San Francisco Bay.

Local climatological effects, including wind speed and direction, temperature, inversion layers, precipitation, and fog, can exacerbate the air quality in the SJVAB. For example, in the summer, wind usually originates at the north end of the SJVAB and flows in a south-southeasterly direction through the SJVAB, through Tehachapi Pass, into the Southeast Desert Air Basin. In the winter, wind direction is reversed and flows in a north-northwesterly direction. In addition to the seasonal wind flow, a sea breeze flows into the SJVAB during the day and a land breeze flows out of the SJVAB at night. The diversified wind flow enhances the pollutant transport capability within the SJVAB.

Attainment Status

Both the State and federal governments have established health-based ambient air quality standards for six criteria air pollutants: carbon monoxide (CO), ozone (O_3), nitrogen dioxide (NO_2), sulfur

dioxide (SO_2), lead, and suspended particulate matter. In addition, the State has set standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles. These standards are designed to protect the health and welfare of the populace with a reasonable margin of safety. Two criteria pollutants, O_3 and NO_2, are considered regional pollutants because they (or their precursors) affect air quality on a regional scale. Pollutants such as CO, SO_2, and lead are considered local pollutants that tend to accumulate in the air locally.

The California Air Resources Board (CARB) is required to designate areas of the State as attainment, nonattainment, or unclassified for all State standards. An *attainment* designation for an area signifies that pollutant concentrations did not violate the standard for that pollutant in that area. A *nonattainment* designation indicates that a pollutant concentration violated the standard at least once, excluding those occasions when a violation was caused by an exceptional event, as defined in the criteria. An *unclassified* designation signifies that data do not support either an attainment or nonattainment status. The California Clean Air Act (CCAA) divides districts into moderate, serious, and severe air pollution categories, with increasingly stringent control requirements mandated for each category.

Table A provides a summary of the attainment status for the SJVAB with respect to National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS).

Table A: San Joaquin Valley Air Basin Air Quality Attainment Status

Pollutant	State	Federal
Ozone (1-hour)	Nonattainment (Severe)	Attainment
Ozone (8-hour)	Nonattainment	Nonattainment (Extreme)
PM_{10}	Nonattainment	Attainment
$PM_{2.5}$	Nonattainment	Nonattainment
Carbon Monoxide	Attainment/Unclassified	Attainment/Unclassified
Nitrogen Dioxide	Attainment	Attainment/Unclassified
Sulfur Dioxide	Attainment	Attainment/Unclassified
Lead	Attainment	Unclassified
Hydrogen Sulfide	Unclassified	No Federal Standard
Sulfates	Attainment	No Federal Standard

Source: SJVAPCD. San Joaquin Valley Attainment Status. Website: https://www.valleyair.org/air-quality-information/ambient-air-quality-standards-valley-attainmnet-status/ (accessed April 2026).
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
PM_{10} = particulate matter less than 10 microns in size

Toxic Air Contaminants

The public's exposure to toxic air contaminants (TACs) is a significant environmental health issue in the State of California. In 1983, the California Legislature enacted a program to identify the health effects of TACs and reduce exposure to these contaminants to protect the public health. Health and Safety Code Section 39655 defines a TAC as "an air pollutant which may cause or contribute to an increase in mortality or in serious illness, or which may pose a present or potential hazard to human health." A substance that is listed as a hazardous air pollutant pursuant to Subsection (b) of United States Code [USC] Title 42, Section 7412, is a TAC. Under State law, the California Environmental Protection Agency (CalEPA), acting through CARB, is authorized to identify a substance as a TAC if it

determines the substance is an air pollutant that may cause or contribute to an increase in mortality or an increase in serious illness, or that may pose a present or potential hazard to human health.

California regulates TACs primarily through Assembly Bill (AB) 1807 (the Tanner Air Toxics Act), AB 2588 (the Air Toxics "Hot Spot" Information and Assessment Act of 1987), and Senate Bill (SB) 25 (the Children's Environmental Health Protection Act). The Tanner Air Toxics Act sets forth a formal procedure for CARB to designate substances as TACs. Once TACs are identified, CARB adopts an "airborne toxics control measure" for sources that emit designated TACs. If there is a safe threshold for a substance at which there is no toxic effect, the control measure must reduce exposure to below that threshold. If there is no safe threshold, the measure must incorporate toxics best available control technology (T-BACT) to minimize emissions.

Air toxics from stationary sources are also regulated in California under AB 2588 (the Air Toxics "Hot Spot" Information and Assessment Act of 1987). Under AB 2588, TAC emissions from individual facilities are quantified and prioritized by the designated air quality management district or air pollution control district. High-priority facilities are required to perform a Health Risk Assessment (HRA) and, if specific thresholds are exceeded, are required to communicate the results to the public in the form of notices and public meetings.

To date, CARB has designated nearly 200 compounds as TACs. Additionally, CARB has implemented control measures for a number of compounds that pose high risks and show potential for effective control. The majority of the estimated health risks from TACs can be attributed to relatively few compounds, the most important being particulate matter from diesel-fueled engines (i.e., diesel particulate matter [DPM]).

Greenhouse Gases

GHGs are present in the atmosphere naturally, are released by natural sources, or form from secondary reactions taking place in the atmosphere. Over the last 200 years, humans have caused substantial quantities of GHGs to be released into the atmosphere. These extra emissions are increasing GHG concentrations in the atmosphere and enhancing the natural greenhouse effect, which is believed to be causing global warming. Although manmade GHGs include naturally occurring GHGs (e.g., carbon dioxide [CO_2], methane [CH_4], and nitrous oxide [N_2O]), some gases (e.g., hydrofluorocarbons [HFCs], perfluorocarbons [PFCs], nitrogen trifluoride [NF_3], and sulfur hexafluoride [SF_6]) are completely new to the atmosphere.

Certain gases (e.g., water vapor) are short-lived in the atmosphere. Others remain in the atmosphere for significant periods of time, contributing to climate change in the long term. Water vapor is excluded from the list of GHGs above because it is short-lived in the atmosphere and its atmospheric concentrations are largely determined by natural processes (e.g., oceanic evaporation).

These gases vary considerably in terms of global warming potential (GWP), which is a concept developed to compare the ability of each GHG to trap heat in the atmosphere relative to another gas. GWP is based on several factors, including the relative effectiveness of a gas in absorbing infrared radiation and the length of time that the gas remains in the atmosphere (i.e., atmospheric lifetime). The GWP of each gas is measured relative to CO_2, the most abundant GHG; the definition

of GWP for a particular GHG is the ratio of heat trapped by one unit mass of the GHG to the ratio of heat trapped by one unit mass of CO_2 over a specified time period. GHG emissions are typically measured in terms of pounds or tons of CO_2 equivalents (CO_2e).

Greenhouse Gas Emissions Inventory

An emissions inventory that identifies and quantifies the primary human-generated sources and sinks of GHGs is a well-recognized and useful tool for addressing climate change. This section summarizes the latest information on global, United States, and California GHG emission inventories.

United States Emissions. In 2023, the year for which the most recent data are available, the United States emitted about 5,894.0 million metric tons (MMT) of CO_2e. Overall, net emissions decreased by 2.9 percent from 2022 to 2023 and decreased by 16.9 percent from 2005 levels. The decrease in total GHG emissions was driven by a decrease in CO_2 emissions from fossil fuel combustion.

State of California Emissions. The State emitted approximately 360.4 MMT CO_2e emissions in 2023, which is 11.2 MMT CO_2e lower than 2022 levels.[2] CARB estimates that transportation was the source of approximately 38 percent of the State's GHG emissions in 2023. The next largest sources included industrial sources at approximately 22 percent and electricity generation at 16 percent. The remaining sources of GHG emissions were residential activities at 10 percent, agriculture at 8 percent, and commercial activities at 7 percent.[3]

Fresno County Emissions. A regional GHG inventory for Fresno County for a baseline year of 2019 was prepared as part of the Fresno County Comprehensive Climate Action Plan-Analysis, approved by the Fresno Council of Governments Policy Board on February 26, 2026. After accounting for carbon sequestration from natural and working lands, the Fresno County region emitted approximately 12.5 MMT CO_2e. The largest sources included transportation emissions at 54.1 percent and agriculture at 22.5 percent.[4]

REGULATORY SETTING

This section provides regulatory background information for air quality and GHGs.

Air Quality

Applicable federal, State, regional, and local air quality regulations are discussed below.

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2 California Air Resources Board (CARB). 2025. *California Greenhouse Gas Emissions for 2000 to 2023, Trends of Emissions and Other Indicators Report*. November 4. Website: https://ww2.arb.ca.gov/sites/default/files/2025-11/nc-2000_2023_ghg_inventory_trends.pdf (accessed April 2026).

3 CARB. 2025. *California Greenhouse Gas Emissions for 2000 to 2023, Trends of Emissions and Other Indicators Report*. November 4. Website: https://ww2.arb.ca.gov/sites/default/files/2025-11/nc-2000_2023_ghg_inventory_trends.pdf (accessed April 2026).

4 Fresno Council of Governments (COG). 2026. *Comprehensive Climate Action Plan Analysis.* Website: https://www.fresnocog.org/wp-content/uploads/2026/03/Final-Report-Fresno-County-CCAP-A-1-1.pdf (accessed April 2026).

Federal Regulations

The 1970 federal Clean Air Act (CAA) authorized the establishment of national health-based air quality standards and set deadlines for their attainment. The CAA Amendments of 1990 changed deadlines for attaining national standards as well as the remedial actions required for areas of the nation that exceed the standards. Under the CAA, State and local agencies in areas that exceed the national standards are required to develop State Implementation Plans to demonstrate how they will achieve the national standards by specified dates. At the federal level, passenger vehicle emissions and fuel economy are regulated through standards established by the United States Environmental Protection Agency (USEPA) and the National Highway Traffic Safety Administration.

State Regulations

In 1988, the CCAA required that all air districts in the State endeavor to achieve and maintain CAAQS for CO, O_3, SO_2, and NO_2 by the earliest practical date. The CCAA provides districts with the authority to regulate indirect sources and mandates that air quality districts focus particular attention on reducing emissions from transportation and areawide emission sources. Each nonattainment district is required to adopt a plan to achieve a 5 percent annual reduction, averaged over consecutive 3-year periods, in districtwide emissions of each nonattainment pollutant or its precursors. A Clean Air Plan shows how a district would reduce emissions to achieve air quality standards. Generally, the State standards for these pollutants are more stringent than the national standards.

CARB is the State's "clean air agency." CARB's goals are to attain and maintain healthy air quality, protect the public from exposure to TACs, and oversee compliance with air pollution rules and regulations. CARB limits heavy-duty diesel trucks to no more than 5 minutes of idling at any location under its statewide anti-idling regulation. Similarly, CARB's In-Use Off-Road Diesel Vehicles Regulation limits off-road diesel vehicles to 5 consecutive minutes of idling. Passenger vehicle emissions have historically been regulated through emissions standards adopted by CARB pursuant to a CCAA waiver; however, recent federal actions have introduced uncertainty regarding the continued implementation of certain California-specific vehicle emissions programs.

Regional Regulations

San Joaquin Valley Air Pollution Control District. The SJVAPCD has specific air quality-related planning documents, rules, and regulations. The SJVAPCD is responsible for formulating and implementing the Air Quality Management Plan (AQMP) for the SJVAB. The main purpose of an AQMP is to bring the area into compliance with federal and State air quality standards. The SJVAPCD does not have one single AQMP for criteria pollutants; rather, the SJVAPCD addresses each criteria pollutant with its own plan. The SJVAPCD has the following AQMPs:

- *2024 Plan for the Annual $PM_{2.5}$ Standard*
- *2023 Maintenance Plan and Redesignation Request for the Revoked 1-Hour Ozone Standard*
- *2022 Plan for the 2015 8-Hour Ozone Standard*
- *2018 Plan for the 1997, 2006, and 2012 $PM_{2.5}$ Standards*
- *2016 Moderate Area Plan for the 2012 $PM_{2.5}$ standard*
- *2016 Plan for the 2008 8-Hour Ozone Standard*
- *2013 Plan for the Revoked 1-Hour Ozone Standard*

- *2007 PM_{10} Maintenance Plan*
- *2004 Revision to the California State Implementation Plan for Carbon Monoxide*

The SJVAPCD's AQMPs incorporate the latest scientific and technological information and planning assumptions, including updated emission inventory methodologies for various source categories. In addition, the AQMPs included the integrated strategies and measures needed to meet the NAAQS, implementation of new technology measures, and demonstrations of attainment of the 1-hour and 8-hour O_3 NAAQS, as well as the latest 24-hour and annual particulate matter less than 2.5 microns in diameter ($PM_{2.5}$) standards.

The SJVAPCD rules and regulations that may apply to the proposed project include, but are not limited to, the following:

- **Regulation VIII—Fugitive PM_{10} Prohibitions.** Rules 8011–8081 are designed to reduce particulate matter less than 10 microns in diameter (PM_{10}) emissions (predominantly dust/dirt) generated by human activity, including construction activities, road construction, bulk materials storage, paved and unpaved roads, and carryout and track out. All development projects that involve soil disturbance are subject to at least one provision of the Regulation VIII series of rules.
    - **Rule 8011—General Requirements: Fugitive Dust Emission Sources.** Fugitive dust regulations are applicable to outdoor fugitive dust sources. Operations, including construction operations, must control fugitive dust emissions in accordance with SJVAPCD Regulation VIII. According to Rule 8011, the SJVAPCD requires the implementation of control measures for fugitive dust emission sources.

- **Rule 2201—New and Modified Stationary Source Review Rule.** This rule provides the review of new and modified stationary sources of air pollution to operate without interfering with the attainment or maintenance of ambient air quality standards and results in no net increase in emissions above specified thresholds.

- **Rule 4102—Nuisance.** The purpose of this rule is to protect the health and safety of the public. It applies to any source operation that emits or may emit air contaminants or other materials.

- **Rule 4601—Architectural Coatings.** The purpose of this rule is to limit volatile organic compound (VOC) emissions from architectural coatings. Emissions are reduced by limits on VOC content and providing requirements on coatings storage, cleanup, and labeling.

- **Rule 9510—Indirect Source Review.** This rule reduces the impact of nitrogen oxides (NO_X) and PM_{10} emissions from new development projects. The rule places application and emission reduction requirements on development projects meeting applicability criteria in order to reduce emissions through on-site mitigation, off-site SJVAPCD-administered projects, or a combination of the two. Compliance with SJVAPCD Rule 9510 reduces emissions impacts through incorporation of on-site measures as well as payment of an off-site fee that funds emission reduction projects in the SJVAB. The emissions analysis for Rule 9510 is detailed and is dependent on the exact project design that is expected to be constructed or installed. Compliance with Rule 9510 is separate from the California Environmental Quality Act (CEQA)

process, although the control measures used to comply with Rule 9510 may be used to mitigate significant air quality impacts.

Local Regulations

City of Fresno General Plan. Chapter 7, Resource Conservation and Resilience, of the City's General Plan contains the following objective and implementing policy related to air quality that would be applicable to the proposed project:[5]

- **Objective RC-4:** In cooperation with other jurisdictions and agencies in the San Joaquin Valley Air Basin, take necessary actions to achieve and maintain compliance with State and federal air quality standards for criteria pollutants.
    - **Policy RC-4-b: Conditions of Approval.** Develop and incorporate air quality maintenance requirements, compatible with Air Quality Attainment and Maintenance Plans, as conditions of approval for General Plan amendments, community plans, Specific Plans, neighborhood plans, Concept Plans, and development proposals.
    - **Policy RC-4-c: Evaluate Impacts with Models.** Continue to require the use of computer models used by SJVAPCD to evaluate the air quality impacts of plans and projects that require such environmental review by the City.
    - **Policy RC-4-e: Support Employer-Based Efforts.** Support and promote employer implementation of staggered work hours and employee incentives to use carpools, public transit, and other measures to reduce vehicular use and traffic congestion

City of Fresno Municipal Code. Building and construction in Fresno are subject to the regulations of the City's Municipal Code. The following provisions of the City's Municipal Code are related to air quality:

- **Article 52 – Development Permit, Section 15-5207, Conditions of Approval:** Section 15-5207 of the City's Municipal Code mandates that conditions of approval of a development permit may include "[…] the proposed design incorporates air quality measures or can demonstrate that it will not negatively impact air quality."

Greenhouse Gases

This section describes regulations related to global climate change at the federal, State, and local levels.

[5] City of Fresno. 2014. Fresno General Plan. Website: https://www.fresno.gov/wp-content/uploads/2023/03/upload_temp_Consolidated-GP-10-13-2022_compressed.pdf (accessed April 2026).

Federal Regulations

The United States has historically had a voluntary approach to reducing GHG emissions. However, on April 2, 2007, the United States Supreme Court ruled that the USEPA has the authority to regulate CO_2 emissions under the CAA.

The USEPA commenced several actions in 2009 to implement a regulatory approach to global climate change, including the 2009 USEPA final rule for mandatory reporting of GHGs from large GHG emission sources in the United States. Additionally, the USEPA Administrator signed an endangerment finding action in 2009 under the CAA, finding that seven GHGs (CO_2, CH_4, N_2O, HFCs, NF_3, PFCs, and SF_6) constitute a threat to public health and welfare, and that the combined emissions from motor vehicles cause and contribute to global climate change, leading to national GHG emission standards.

The Inflation Reduction Act (IRA) of 2022 reaffirmed the USEPA's authority to regulate GHG emissions under the CAA. In January 2025, Executive Order (EO) 14153, Unleashing American Energy, agencies were directed to stop issuing funds under the IRA. A bill has been introduced to repeal the IRA, but it has not been passed through the legislative process as of April 2026.

State Regulations

CARB is the lead agency for implementing climate change regulations in the State. Since its formation, CARB has worked with the public, the business sector, and local governments to find solutions to California's air pollution problems. Key efforts by the State are described below.

Low-Emission Vehicle Program. Starting in 1990, CARB initiated the Low-Emission Vehicle (LEV) program to reduce GHG emissions from passenger vehicles. The Advanced Clean Cars project was adopted in 2012, followed by Advanced Clean Cars II in 2022. Recent federal actions have introduced uncertainty regarding the continued implementation of California-specific vehicle emissions programs.

Assembly Bill 32, California Global Warming Solutions Act. California's major initiative for reducing GHG emissions is AB 32, passed by the State Legislature on August 31, 2006. This effort set a target to reduce GHG emissions to 1990 levels by 2020. CARB has established the level of GHG emissions in 1990 at 427 MMT CO_2e. The emission target of 427 MMT CO_2e requires the reduction of 169 MMT CO_2e from the State's projected business-as-usual 2020 emissions of 596 MMT CO_2e. AB 32 requires CARB to prepare a Scoping Plan that outlines the main State strategies for meeting the 2020 deadline and to reduce GHGs that contribute to global climate change. CARB approved the original Scoping Plan on December 11, 2008, which contains the main strategies California will implement to achieve the reduction goals and includes CARB-recommended GHG reductions for each emissions sector of the State's GHG inventory.

The 2022 Scoping Plan, which is the most recent Scoping Plan, was approved in December 2022 and assesses progress toward the statutory 2030 target (established by EO B-30-15, described below)

while laying out a path to achieving carbon neutrality no later than 2045.[6] The 2022 Scoping Plan Update focuses on outcomes needed to achieve carbon neutrality by assessing paths for clean technology, energy deployment, natural and working lands, and others, and is designed to meet the State's long-term climate objectives and support a range of economic, environmental, energy security, environmental justice, and public health priorities.

The 2022 Scoping Plan focuses on building clean energy production and distribution infrastructure for a carbon-neutral future, including transitioning existing energy production and transmission infrastructure to produce zero-carbon electricity and hydrogen, and utilizing biogas resulting from wildfire management or landfill and dairy operations, among other substitutes. The 2022 Scoping Plan states that in almost all sectors, electrification will play an important role. The 2022 Scoping Plan evaluates clean energy and technology options and the transition away from fossil fuels, including adding four times the solar and wind capacity by 2045 and about 1,700 times the amount of current hydrogen supply. As discussed in the 2022 Scoping Plan, EO N-79-20 requires that all new passenger vehicles sold in California be zero-emission by 2035 and that all other fleets transition to zero-emission as fully as possible by 2045, which will reduce the percentage of fossil fuel combustion vehicles.

Senate Bill 375 (2008). Signed into law on October 1, 2008, SB 375 supplements GHG reductions from new vehicle technology and fuel standards with reductions from more efficient land use patterns and improved transportation in an effort to reduce vehicle miles traveled (VMT). Under the law, CARB approved GHG reduction targets in February 2011 for California's 18 federally designated regional planning bodies, known as Metropolitan Planning Organizations (MPOs). CARB may update the targets every 4 years and must update them every 8 years. MPOs, in turn, must demonstrate how their plans, policies, and transportation investments meet the targets set by CARB through Sustainable Communities Strategies (SCSs). The SCSs are included with the Regional Transportation Plan (RTP), a report required by State law.

Executive Order B-30-15 (2015). Governor Jerry Brown signed EO B-30-15 on April 29, 2015, which added the immediate target that GHG emissions should be reduced to 40 percent below 1990 levels by 2030. All State agencies with jurisdiction over sources of GHG emissions were directed to implement measures to achieve reductions of GHG emissions to meet the 2030 and 2050 targets. CARB was directed to update the AB 32 Scoping Plan to reflect the 2030 target and, therefore, is moving forward with the update process. The midterm target is critical to help frame the suite of policy measures, regulations, planning efforts, and investments in clean technologies and infrastructure needed to continue reducing emissions.

Senate Bill 350, Clean Energy and Pollution Reduction Act. SB 350, signed by Governor Jerry Brown on October 7, 2015, updates and enhances AB 32 by introducing the following set of objectives in clean energy, clean air, and pollution reduction for 2030:

- Raise California's renewable portfolio standard from 33 percent to 50 percent.
- Increase energy efficiency in buildings by 50 percent by the year 2030.

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6 CARB. 2022. *2022 Scoping Plan for Achieving Carbon Neutrality*. Website: https://ww2.arb.ca.gov/sites/default/files/2022-12/2022-sp.pdf (accessed April 2026).

The 50 percent renewable energy standard will be implemented by the California Public Utilities Commission (CPUC) for private utilities and by the California Energy Commission (CEC) for municipal utilities. Each utility must submit a procurement plan showing it will purchase clean energy to displace other nonrenewable resources. The 50 percent increase in energy efficiency in buildings must be achieved through the use of existing energy-efficiency retrofit funding and regulatory tools already available to State energy agencies under existing law. The addition made by this legislation requires State energy agencies to plan for and implement those programs in a manner that achieves the energy efficiency target.

Senate Bill 32, California Global Warming Solutions Act of 2016, and Assembly Bill 197. In summer 2016 the Legislature passed, and the Governor signed, SB 32, and AB 197. SB 32 affirms the importance of addressing climate change by codifying into statute the GHG emissions reductions target of at least 40 percent below 1990 levels by 2030 contained in Governor Brown's April 2015 EO B-30-15. SB 32 builds on AB 32 and provides the framework toward achieving the State's 2050 objective of reducing emissions to 80 percent below 1990 levels, consistent with an Intergovernmental Panel on Climate Change (IPCC) analysis of the emissions trajectory that would stabilize atmospheric GHG concentrations at 450 parts per million (ppm) CO_2e and reduce the likelihood of catastrophic impacts from climate change. The companion bill to SB 32, AB 197, provides additional direction to CARB related to the adoption of strategies to reduce GHG emissions.

Senate Bill 100 (2018). On September 10, 2018, Governor Brown signed SB 100, which raises California's renewable portfolio standard requirements to 60 percent by 2030, with interim targets, and 100 percent by 2045. The bill also establishes a State policy that eligible renewable energy resources and zero-carbon resources supply 100 percent of all retail sales of electricity to California end-use customers and 100 percent of electricity procured to serve all State agencies by December 31, 2045. Under the bill, the State cannot increase carbon emissions elsewhere in the Western grid or allow resource shuffling to achieve the 100 percent carbon-free electricity target.

Executive Order B-55-18 (2018).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 that future Scoping Plans identify and recommend measures to achieve the carbon neutrality goal. The goal of carbon neutrality by 2045 is in addition to other statewide goals, meaning that not only should emissions be reduced to 80 percent below 1990 levels by 2050, but that, by no later than 2045, the remaining emissions should be offset by equivalent net removals of CO_2e from the atmosphere, including through sequestration in forests, soils, and other natural landscapes.

Assembly Bill 1279 (2022). AB 1279 was signed in September 2022 and codifies the State goals of achieving net carbon neutrality by 2045 and maintaining net negative GHG emissions thereafter. This bill also requires California to reduce statewide GHG emissions by 85 percent compared to 1990 levels by 2045 and directs CARB to work with relevant State agencies to achieve these goals.

Regional Regulations

San Joaquin Valley Air Pollution Control District. In August 2008, the SJVAPCD adopted the Climate Change Action Plan (CCAP).[7] The CCAP directed the SJVAPCD to develop guidance to assist lead agencies, project proponents, permit applicants, and interested parties in assessing and reducing the impacts of project specific GHG emissions on global climate change.

In December 2009, the SJVAPCD adopted the *Guidance for Valley Land-use Agencies in Addressing GHG Emission Impacts for New Projects under CEQA*[8] and the *District Policy – Addressing GHG Emission Impacts for Stationary Source Projects Under CEQA When Serving as the Lead Agency*.[9] The guidance and policy rely on the use of performance based standards, otherwise known as Best Performance Standards (BPS),[10] to assess significance of project-specific GHG emissions on global climate change during the environmental review process, as required by CEQA. Projects implementing BPS in accordance with SJVAPCD's guidance would be determined to have a less than significant individual and cumulative impact on GHG emissions and would not require project specific quantification of GHG emissions.

Fresno Council of Governments Regional Transportation Plan/Sustainable Communities Strategy. RTPs are State-mandated plans that identify long-term transportation needs for a region's transportation network. The Fresno Council of Governments' (COG) 2022 RTP charts the long-range vision of regional transportation in Fresno County through the year 2046.[11] The RTP identifies existing and future transportation-related needs, while considering all modes of travel, analyzing alternative solutions, and identifying priorities for the anticipated available funding for more than 3,000 projects and multiple programs included within it. SB 375, which went into effect in 2009, added statutes to the California Government Code to encourage planning practices that create sustainable communities. It calls for each MPO to prepare an SCS as an integrated element of the RTP that is to be updated every 4 years. The SCS is intended to show how integrated land use and transportation planning can lead to lower GHG emissions from autos and light trucks. The Fresno COG has included the SCS in its 2022 RTP.

Local Regulations

City of Fresno General Plan. Chapter 7, Resource Conservation and Resilience, of the City's General Plan contains the following objective and implementing policy related to GHG emissions that would be applicable to the proposed project:[12]

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7 SJVAPCD. 2008. *Climate Change Action Plan.* November.

8 SJVAPCD. 2009. *Guidance for Valley Land-Use Agencies in Addressing GHG Emission Impacts for New Projects under CEQA*. December 17.

9 Ibid.

10 SJVAPCD. 2009. *Final Staff Report Appendix J: GHG Emission Reduction Measures – Development Projects.* December 17.

11 Fresno COG. 2022. *2022 Regional Transportation Plan.* Website: https://www.planfresno.com/previous-rtps/ (accessed April 2026).

12 City of Fresno. 2014. *Fresno General Plan.* Website: https://www.fresno.gov/wp-content/uploads/2023/03/upload_temp_Consolidated-GP-10-13-2022_compressed.pdf (accessed April 2026).

- **Objective RC-5:** In cooperation with other jurisdictions and agencies in the San Joaquin Valley Air Basin, take timely, necessary, and the most cost effective actions to achieve and maintain reductions in greenhouse gas emissions and all strategies that reduce the causes of climate change in order to limit and prevent the related potential detrimental effects upon public health and welfare of present and future residents of the Fresno community.

    - **Policy RC-5-a: Support State Goal to Reduce Statewide GHG Emissions.** As is consistent with State law, strive to meet AB 32 goal to reduce greenhouse gas emissions to 1990 levels by 2020 and strive to meet a reduction of 80 percent below 1990 levels by 2050 as stated in Executive Order S-03-05. As new statewide GHG reduction targets and dates are set by the State update the City's Greenhouse Gas Reduction Plan to include a comprehensive strategy to achieve consistency with those targets by the dates established.

    - **Policy RC-5-e:** Ensure Compliance. Ensure ongoing compliance with GHG emissions reduction plans and programs by requiring that air quality measures are incorporated into projects' design, conditions of approval, and mitigation measures

    - **Policy RC-5-g: Evaluate Impacts with Models.** Continue to use computer models such as those used by SJVAPCD to evaluate greenhouse gas impacts of plans and projects that require such review.

METHODOLOGY

Air Quality

Construction Emissions

Construction activities can generate a substantial amount of air pollution. Construction activities are considered temporary; however, short-term impacts can contribute to exceedances of air quality standards. Construction activities include demolition, site preparation, earthmoving, and general construction. The emissions generated from these common construction activities include fugitive dust from soil disturbance, fuel combustion from mobile heavy-duty diesel- and gasoline-powered equipment, portable auxiliary equipment, and worker commute trips.

The California Emissions Estimator Model (CalEEMod) Version 2022.1 computer program was used to calculate emissions from on-site construction equipment and emissions from worker and vehicle trips to the site. CalEEMod is a statewide land use emissions web model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutants associated with both construction and operation of a variety of land use projects. The model quantifies direct emissions from construction and operations (including vehicle use), as well as indirect emissions, such as GHG emissions from energy use, solid waste disposal, vegetation planting and/or removal, and water use for land use developments and linear projects. Default data (e.g., emission factors, trip lengths, meteorology, source inventory, etc.) have been provided by the various California air districts to account for local requirements and conditions.

For this analysis, construction of the proposed project was assumed to commence in June 2026 and occur for approximately 15 months. This is a conservative assumption because, should construction commence at a later date, emissions are expected to be less due to technological improvements and

increasingly stringent regulations. Excavators would be equipped with Tier 4 engines; other construction equipment is assumed to be default. Approximately 44,000 square feet of asphalt would be removed during demolition, and approximately 1,625 cubic yards of soil would be imported to the project site. Consistent with SJVAPCD Regulation VIII for fugitive dust control, dust reduction measures, including watering exposed areas and unpaved roads twice daily and limiting vehicle speeds to 25 miles per hour on unpaved areas, were included in the modeling. Other detailed construction information is currently unavailable; therefore, this analysis utilizes CalEEMod default assumptions.

Operational Emissions

The air quality analysis includes estimating emissions associated with long-term operation of the proposed project. Consistent with the SJVAPCD guidance for estimating emissions associated with land use development projects, the CalEEMod computer program was used to calculate the long-term operational emissions associated with the project.

The project analysis was conducted using land use code *Enclosed Parking with Elevator.* Vehicle trip generation rates were updated in CalEEMod to be consistent with the project-specific traffic analysis, which determined that the proposed project would generate approximately four average daily trips for maintenance activities.[13] The modeling also included a backup generator, which was modeled as an 400-horsepower, diesel-fueled generator that would operate for up to 50 hours per year. Where project-specific data were not available, default assumptions (e.g., water usage, solid waste generation) from CalEEMod were used to estimate project emissions. CalEEMod output sheets are included in Attachment A.

Greenhouse Gas Emissions

GHG emissions associated with the project would occur over the short term from construction activities, consisting primarily of emissions from equipment exhaust. There would also be long-term GHG emissions associated with project-related vehicular trips. Lead agencies should calculate or estimate emissions from vehicular traffic, energy consumption, water conveyance and treatment, waste generation, construction activities, and any other significant sources of emissions within the project area. CalEEMod was used to quantify GHG emissions generated by the project.

THRESHOLDS OF SIGNIFICANCE

Air Quality

The *State CEQA Guidelines* indicate that a project would normally have a significant adverse air quality impact if project-generated pollutant emissions would do any of the following:

- Conflict with or obstruct implementation of the applicable air quality plan;
- Result in a cumulatively considerable net increase of any criteria pollutant for which the project is in nonattainment under applicable NAAQS or CAAQS;

[13] LSA. 2026. *H-Street Parking Building Project Trip Generation Analysis and Vehicle Miles Traveled Screening Analysis Memorandum* (LSA Project No. CFO2202.10).

- Expose sensitive receptors to substantial pollutant concentrations; or
- Result in other emissions (such as those leading to odors) affecting a substantial number of people.

Certain air districts (e.g., SJVAPCD) have created guidelines and requirements to conduct air quality analysis. The SJVAPCD's current guidelines, outlined in the GAMAQI, were followed in this assessment of air quality impacts for the proposed project.

Regional Emissions Thresholds

The SJVAPCD defines emissions thresholds in the GAMAQI, which are established based on the attainment status of the SJVAB with regard to air quality standards for specific criteria pollutants. Because the concentration standards were set at a level that protects public health with an adequate margin of safety, these emission thresholds are regarded as conservative and would overstate an individual project's contribution to health risks. The related impacts are discussed further in the Impact Analysis section. The SJVAPCD regional emission thresholds for construction and operation are shown in Table B.

Table B: Regional Thresholds for Construction and Operational Emissions

Emissions Source	Pollutant Emissions Threshold (tons per year)					
	CO	NO_X	ROG	SO_X	PM_{10}	$PM_{2.5}$
Construction	100	10	10	27	15	15
Operations	100	10	10	27	15	15

Source: *Guidance for Assessing and Mitigating Air Quality Impacts* (SJVAPCD 2015).
CO = carbon monoxide
NO_X = nitrogen oxides
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
PM_{10} = particulate matter less than 10 microns in size
ROG = reactive organic gas
SJVAPCD = San Joaquin Valley Air Pollution Control District
SO_X = sulfur oxides

Local Microscale Concentration Standards

The significance of localized project impacts under CEQA depends on whether ambient CO levels in the project vicinity are above or below State and federal CO standards. Because ambient CO levels are below the standards throughout the SJVAB, a project would be considered to have a significant CO impact if project emissions result in an exceedance of one or more of the 1-hour or 8-hour standards. The following are applicable local emission concentration standards for CO:

- California State 1-hour CO standard of 20 ppm
- California State 8-hour CO standard of 9 ppm

Greenhouse Gas Emissions

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

- Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment; or

- Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.

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

Neither the City nor the SJVAPCD has developed or adopted numeric GHG significance thresholds. Therefore, in the absence of any City or SJVAPCD specific guidelines or thresholds, this analysis evaluates the proposed project for consistency with the CARB 2022 Scoping Plan and the Fresno COG 2022 RTP/SCS.

IMPACT ANALYSIS

This section identifies potential air quality and GHG impacts associated with implementation of the proposed project.

Air Quality

Air pollutant emissions associated with the project would occur over the short term from construction activities and over the long term from operational activities associated with the proposed project.

Consistency with Applicable Air Quality Plans

An air quality plan describes air pollution control strategies to be implemented by a city, county, or region classified as a nonattainment area. The main purpose of the air quality plan is to bring the area into compliance with the requirements of the federal and State air quality standards.

The SJVAPCD has different air quality plans to address pollutants for which the region is in non-attainment or in maintenance. The SJVAPCD adopted the *2022 Plan for the 2015 8-hour Ozone Standard* in December 2022 to satisfy CAA requirements and plan for regional attainment of the 70 parts per billion (ppb) 8-hour ozone standard.[14] To ensure the SJVAB's continued attainment of

[14] SJVAPCD. 2022. *2022 Plan for the 2015 8-Hour Ozone Standard*. December 15. Website: https://ww2.valleyair.org/media/q55posm0/0000-2022-plan-for-the-2015-8-hour-ozone-standard.pdf (accessed April 2026).

the USEPA PM_{10} standard, the SJVAPCD adopted the *2007 PM_{10} Maintenance Plan* in September 2007. In addition, the SJVAPCD adopted the *2024 Plan for the 2012 $PM_{2.5}$ Standard,*[15] which addresses compliance with the federal annual $PM_{2.5}$ standard of 12 micrograms per cubic meter ($\mu g/m^3$) by 2030.

For a project to be consistent with SJVAPCD air quality plans, the pollutants emitted from a project should not exceed the SJVAPCD emission thresholds or cause a significant impact on air quality. As discussed below, construction of the proposed project would not result in the generation of criteria air pollutants that would exceed SJVAPCD thresholds of significance. In addition to the construction period thresholds of significance, the SJVAPCD has implemented Regulation VIII measures for dust control during construction. These control measures are intended to reduce the amount of PM_{10} emissions during the construction period. Implementation of the fugitive dust control measures outlined in Regulatory Compliance Measure (RCM) AIR-1, would ensure that the proposed project complies with Regulation VIII, further reduces the short-term construction-period air quality impacts, and ensures compliance with air quality plans.

In addition, long-term operational emissions associated with the proposed project, including area, energy, and mobile source emissions, would not exceed the thresholds that were developed to help the SJVAB achieve attainment of the NAAQS and CAAQS. Finally, it is noted that the proposed project is generally consistent with the City's General Plan and long-range planning efforts.

Therefore, the proposed project would not conflict with or obstruct implementation of applicable air quality plans, and the impact would be less than significant.

Criteria Pollutant Analysis

The SJVAB is currently designated as nonattainment for the federal and State standards for O_3 and $PM_{2.5}$. In addition, the SJVAB is in nonattainment for the PM_{10} standard. The SJVAB's nonattainment status is attributed to the region's development history. Past, present, and future development projects contribute to the region's adverse air quality impacts on a cumulative basis. By its very nature, air pollution is largely a cumulative impact. No single project is sufficient in size to, by itself, result in nonattainment of an ambient air quality standard. Instead, a project's individual emissions contribute to existing cumulatively significant adverse air quality impacts. If a project's contribution to the cumulative impact is considerable, then the project's impact on air quality would be considered significant.

In developing thresholds of significance for air pollutants, the SJVAPCD considered the emission levels for which a project's individual emissions would be cumulatively considerable. If a project exceeds the identified significance thresholds, its emissions would be cumulatively considerable, resulting in significant adverse air quality impacts to the region's existing air quality conditions. The following analysis assesses the potential construction- and operation-related air quality impacts.

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15 SJVAPCD. 2024. *2024 Plan for the 2012 Annual $PM_{2.5}$ Standard*. June 20. Website: https://ww2.valleyair.org/media/gw5bacvj/2024-pm25-plan.pdf (accessed April 2026).

Construction Emissions. During construction, short-term degradation of air quality may occur due to the release of particulate emissions generated by grading, paving, building, and other activities. Emissions from construction equipment are also anticipated and would include CO, NO_X, reactive organic gas (ROG), directly emitted particulate matter ($PM_{2.5}$ and PM_{10}), and TACs such as DPM.

Construction activities associated with the proposed project would include site preparation, grading, paving, and building activities. Construction-related effects on air quality from the proposed project would be greatest during the site preparation phase due to the disturbance of soils. If not properly controlled, these activities would temporarily generate particulate emissions. Sources of fugitive dust would include disturbed soils at the construction site. Unless properly controlled, vehicles leaving the site would deposit dirt and mud on local streets, which could be an additional source of airborne dust after it dries. PM_{10} emissions would vary from day to day, depending on the nature and magnitude of construction activity and local weather conditions. PM_{10} emissions would depend on soil moisture, silt content of soil, wind speed, and the amount of operating equipment. Larger dust particles would settle near the source, while fine particles would be dispersed over greater distances from the construction site.

Water or other soil stabilizers can be used to control dust, resulting in emission reductions of 50 percent or more. The SJVAPCD has implemented Regulation VIII measures for reducing fugitive dust emissions (PM_{10}). With the implementation of Regulation VIII measures, fugitive dust emissions from construction activities would not result in adverse air quality impacts.

In addition to dust-related PM_{10} emissions, heavy trucks and construction equipment powered by gasoline and diesel engines would generate CO, SO_2, NO_X, ROG, and some soot particulate ($PM_{2.5}$ and PM_{10}) in exhaust emissions. If construction activities were to increase traffic congestion in the area, CO and other emissions from traffic would increase slightly while those vehicles idle in traffic. These emissions would be temporary in nature and limited to the immediate area surrounding the construction site.

Construction emissions were estimated for the project using CalEEMod and are summarized in Table C. See Attachment A to this memorandum for CalEEMod output sheets.

Table C: Project Construction Emissions

Construction Year	Pollutant Emissions (Tons per Year)					
	ROG	NO_x	CO	SO_X	PM_{10}	$PM_{2.5}$
2026	0.12	0.88	1.10	<0.01	0.13	0.06
2027	0.19	1.12	1.58	<0.01	0.13	0.05
SJVAPCD Threshold	**10.0**	**10.0**	**100.0**	**27.0**	**15.0**	**15.0**
Significant?	**No**	**No**	**No**	**No**	**No**	**No**

Source: Compiled by LSA (April 2026).
CO = carbon monoxide
NO_X = nitrogen oxides
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
PM_{10} = particulate matter less than 10 microns in size
ROG = reactive organic gas
SJVAPCD = San Joaquin Valley Air Pollution Control District
SO_X = sulfur oxides

As shown in Table C, construction emissions associated with the proposed project would not exceed the SJVAPCD's thresholds for ROG, NO_X, CO, SO_X, PM_{10}, and $PM_{2.5}$ emissions.

In addition, if the proposed project is determined to be subject to SJVAPCD Rule 9510 (Indirect Source Review), the project applicant would be required to comply with applicable ISR requirements, which may include implementation of emission reduction measures or payment of applicable ISR fees to further reduce regional NO_x and PM_{10} emissions. Separately, compliance with SJVAPCD Regulation VIII fugitive dust control requirements during construction would minimize localized PM_{10} emissions. Implementation of RCM AIR-1 would ensure that the proposed project complies with Regulation VIII.

RCM AIR-1 Consistent with San Joaquin Valley Air Pollution Control District (SJVAPCD) Regulation VIII (Fugitive PM_{10} Prohibitions), the following controls are required to be included as specifications for the proposed project and implemented at the construction site:

- All disturbed areas, including storage piles, which are not being actively utilized for construction purposes, shall be effectively stabilized of dust emissions using water or chemical stabilizer/suppressant or covered with a tarp or other suitable cover or vegetative ground cover.
- All on-site unpaved roads and off-site unpaved access roads shall be effectively stabilized of dust emissions using water or chemical stabilizer/suppressant.
- All land clearing, grubbing, scraping, excavation, land leveling, grading, and cut and fill activities shall be effectively controlled of fugitive dust emissions utilizing application of water or by presoaking.
- When materials are transported off site, all material shall be covered or effectively wetted to limit visible dust emissions, and at least 6 inches of freeboard space from the top of the container shall be maintained.
- All operations shall limit or expeditiously remove the accumulation of mud or dirt from adjacent public streets at the end of each workday. (The use of dry rotary brushes is expressly prohibited except where preceded or accompanied by sufficient wetting to limit the visible dust emissions. Use of blower devices is expressly forbidden.)
- Following the addition of materials to, or the removal of materials from, the surface of outdoor storage piles, said piles shall be effectively stabilized of fugitive dust emissions utilizing sufficient water or chemical stabilizer/suppressant.

Construction emissions associated with the proposed project would be less than significant with implementation of RCM AIR-1. Therefore, construction of the proposed project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment under an applicable NAAQS or CAAQS.

Operational Emissions. Long-term air pollutant emissions that could occur with operation of the proposed project include emissions from area, energy, and mobile sources. Area-source emissions include architectural coatings and landscaping. Energy-source emissions result from activities in buildings that use natural gas. Mobile-source emissions are from vehicle trips associated with operation of the project. Mobile-source emissions include ROG and NO_X emissions that contribute to the formation of O_3. Additionally, PM_{10} emissions result from running exhaust, tire and brake wear, and the entrainment of dust into the atmosphere from vehicles traveling on paved roadways.

Long-term operational emissions associated with the proposed project were calculated using CalEEMod. Table D provides the proposed project's estimated operational emissions. See Attachment A to this memorandum for CalEEMod output sheets.

Table D: Project Operational Emissions

Emission Type	Pollutant Emissions (Tons per Year)					
	ROG	**NO_X**	**CO**	**SO_X**	**PM_{10}**	**$PM_{2.5}$**
Mobile Sources	0.00	0.00	0.02	0.00	0.00	0.00
Area Sources	0.24	0.01	1.42	0.00	0.00	0.00
Energy Sources	0.00	0.00	0.00	0.00	0.00	0.00
Stationary Sources	0.02	0.05	0.04	0.00	0.00	0.00
Total Project Emissions	**0.25**	**0.06**	**1.47**	**0.00**	**0.01**	**0.01**
SJVAPCD Threshold	10.0	10.0	100.0	27.0	15.0	15.0
Exceeds Threshold?	**No**	**Yes**	**No**	**No**	**No**	**No**

Source: Compiled by LSA (April 2026).
Note: Some values may not appear to add correctly due to rounding.
CO = carbon monoxide
NO_X = nitrogen oxides
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
PM_{10} = particulate matter less than 10 microns in size
ROG = reactive organic gas
SJVAPCD = San Joaquin Valley Air Pollution Control District
SO_X = sulfur oxides

As shown in Table D, long-term operational emissions associated with the proposed project would not exceed the applicable thresholds of significance for annual ROG, NO_X, CO, SO_X, PM_{10}, or $PM_{2.5}$ emissions. In addition, if the proposed project is determined to be subject to SJVAPCD Rule 9510, Indirect Source Review, the project applicant would be required to comply with applicable ISR requirements, which may include implementation of emission reduction measures or payment of applicable ISR fees to address regional NO_x and PM_{10} emissions. Compliance with Rule 9510 may further reduce regional NO_X and PM_{10} emissions beyond those conservatively estimated in Table D.

Therefore, operation of the proposed project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable NAAQS or CAAQS.

Long-Term Microscale (CO Hot Spot) Analysis. Localized air quality impacts can occur when emissions from vehicular traffic increase as a result of a project. The primary mobile-source pollutant of local concern is CO, a direct function of vehicle idling time and, thus, of traffic flow conditions. CO transport is extremely limited; under normal meteorological conditions, it disperses rapidly with distance from the source. However, under certain extreme meteorological conditions, CO

concentrations near a congested roadway or intersection may reach unhealthful levels, thereby affecting local sensitive receptors (e.g., residents, schoolchildren, the elderly, and hospital patients).

Typically, high CO concentrations are associated with roadways or intersections operating at unacceptable levels of service or with extremely high traffic volumes. In areas with high ambient background CO concentrations, modeling is recommended to determine a project's effect on local CO levels. SJVAPCD does not provide screening thresholds for localized CO impacts based on traffic volumes. However, the Bay Area Air District provides general screening guidance that a less than significant localized CO impact is expected if project traffic would not increase traffic volumes at affected intersections to more than 44,000 vehicles per hour, or if a project would not increase traffic volumes at affected intersections to more than 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited (e.g., tunnel, parking garage, bridge underpass, natural or urban street canyon, or below-grade roadway).[16]

The proposed project is expected to generate four average daily trips, with zero trips occurring during peak hours.[17] As described in the Traffic Study, the proposed project meets the criteria for a Small Project, which is defined as a project generating fewer than 500 daily trips. Therefore, the proposed project was screened out from a detailed VMT analysis and would result in a less than significant VMT impact.[18] The addition of project-generated trips would not result in peak-hour traffic volumes at intersections in the vicinity of the project site in excess of 44,000 vehicles per hour. In addition, the project site is not located in an area where vertical or horizontal mixing is substantially limited.

Given the lack of traffic impacts associated with the project, project-related vehicles are not expected to result in CO concentrations exceeding the State or federal CO standards.

Impacts to Sensitive Receptors

Construction and operations of a proposed project may result in emissions of pollutants that could adversely affect existing sensitive receptors in the project area. As noted previously, the closest sensitive receptors to the project site are the residences to the southwest, approximately 615 feet from the project boundary. The following discussion evaluates potential impact related to emissions of TACs, naturally occurring asbestos, and valley fever spores.

Toxic Air Contaminants. Construction of the proposed project may expose surrounding sensitive receptors to airborne particulates and a small quantity of construction equipment pollutants (i.e., usually diesel-fueled vehicles and equipment). In the *Air Quality and Land Use Handbook,* CARB indicates that DPM concentrations from mobile and stationary sources decrease substantially with

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16 Bay Area Air District. 2022. *2022 CEQA Guidelines; Screening Criteria.* Website: https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa-guidelines-2022/ceqa-guidelines-chapter-4-screening_final-pdf.pdf?rev=ac551d35a52d479dad475e7d4c57afa6&sc_lang=en (accessed April 2026).

17 LSA. 2026. *H-Street Parking Building Project Trip Generation Analysis and Vehicle Miles Traveled Screening Analysis Memorandum* (LSA Project No. CFO2202.10).

18 Ibid.

distance, with markedly reduced concentrations beyond approximately 500 feet. [19] Because the nearest sensitive receptors are more than 500 feet from the project site, DPM emissions would be substantially dispersed prior to reaching receptors.

Nevertheless, construction contractors would be required to implement SJVAPCD Regulation VIII, as ensured through RCM AIR-1, which would reduce emissions of fugitive dust. In addition, idling of trucks would be limited by CARB's In-Use Off-Road Diesel Vehicles regulation, which limits idling to 5 minutes or less. Minimizing idling time reduces vehicle exhaust emissions.[20] According to CARB, DPM emissions have also been shown to be highly dispersive in the atmosphere, with the DPM concentration decreasing with distance from the source.[21] Furthermore, the primary construction activities associated with the proposed project would occur over a short time frame (less than 2 years); therefore, potential sensitive receptors would be exposed to emissions associated with construction activities for a limited duration. Finally, project construction pollutant emissions would be below the SJVAPCD significance thresholds, which includes thresholds for particulate matter. Overall, construction of the project is not expected to result in the exposure of sensitive receptors to substantial pollutant concentrations.

Once operational, the proposed project would generate very few new vehicle trips and would provide parking for existing trips in the area. A diesel-fueled emergency generator would be provided on site but would only be run during emergency power outages or for standard maintenance and testing. The generator would be subject to permitting through the SJVAPCD and would be required to comply with all applicable regulations, including New Source Review (Rule 2201) and any specific limitations on hours of operations, fuel use, and monitoring and reporting. Compliance with SJVAPCD rules would further limit doses and exposures, reducing potential health risk related to vehicle and equipment emissions to a level that is not significant. Therefore, operations of the proposed project would not result in new sources of TACs and would not expose sensitive receptors to substantial levels of TACs.

Naturally Occurring Asbestos. The project is located in Fresno County, which is among the counties found to have serpentine and ultramafic rock in their soils.[22] However, according to the California Geological Survey, serpentine and ultramafic rock is not known to occur in the project vicinity.[23]

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19 CARB. 2005. *Air Quality and Land Use Handbook: A Community Health Perspective*. Website: https://ww2.arb.ca.gov/sites/default/files/2023-05/Land%20Use%20Handbook_0.pdf (accessed April 2026).

20 CARB. 2025. *In-use off-Road Diesel Vehicle Regulation*. Website: https://ww2.arb.ca.gov/capp-resource-center/heavy-duty-diesel-vehicle-idling-information (accessed April 2026).

21 CARB. 2005. *Air Quality and Land Use Handbook: A Community Health Perspective*. Website: https://ww2.arb.ca.gov/sites/default/files/2023-05/Land%20Use%20Handbook_0.pdf (accessed April 2026).

22 California Department of Conservation (DOC). California Geological Survey. Asbestos. Website: https://www.conservation.ca.gov/cgs/minerals/mineral-hazards (accessed April 2026).

23 DOC. n.d. California Geological Survey. Naturally-Occurring Asbestos in California. Website: https://www.conservation.ca.gov/cgs/minerals/mineral-hazards/asbestos (accessed April 2026).

Therefore, the potential risk for naturally occurring asbestos during project construction is not considered significant.

Valley Fever. The closest sensitive receptors are the residences to the southwest, approximately 615 feet from the project boundary. This distance is sufficient that particulate matter would settle prior to reaching the nearest sensitive receptor. Therefore, any valley fever spores suspended with the dust would not be anticipated to reach the sensitive receptors. However, during project construction, it is possible that workers could be exposed to valley fever through fugitive dust. Dust control measures, as ensured by RCM AIR-1 and consistent with SJVAPCD Regulation VIII,[24] would reduce the exposure to the workers and sensitive receptors. Therefore, dust from construction of the project is not anticipated to significantly add to the existing exposure of people to valley fever.

Odors

During construction, the various diesel-powered vehicles and equipment in use on site would create localized odors. Construction-related odors are often localized as they are concentrated at the source and dispersed by wind and distance. In addition, construction-related odors are temporary and would cease to occur after construction. Because the project's potential construction-related odor impacts are localized and temporary, they would not adversely affect a substantial number of people.

The SJVAPCD has determined the common land use types that are known to produce odors in the SJVAPCD, including wastewater treatment facilities, sanitary landfills, transfer stations, composting facilities, petroleum refineries, asphalt batch plants, chemical manufacturing, fiberglass manufacturing, painting/coating operations (e.g. auto body shops), food processing facilities, feed lots/dairies, and rendering plants. The proposed project does not include any common odor-producing land uses.

Finally, in the event that odor complaints arise, the SJVAPCD has the authority to investigate and enforce compliance under its nuisance rule, Rule 4102, to ensure that any odor complaints are addressed.

In conclusion, objectionable odors affecting a substantial number of people would not occur as a result of the project.

Greenhouse Gas Emissions

The following sections describe the proposed project's construction- and operation-related GHG impacts and consistency with applicable GHG reduction plans.

[24] SJVAPCD. 2024. *Current District Rules and Regulations*. Website: https://ww2.valleyair.org/rules-and-planning/current-district-rules-and-regulations (accessed April 2026).

Generation of Greenhouse Gas Emissions

This section describes the proposed project's construction- and operation-related GHG emissions and contribution to global climate change.

Construction Emissions. Construction activities associated with construction of the proposed project would cause short-term GHG emissions. Construction activities with the proposed project would produce combustion emissions from various sources. During construction, GHGs would be emitted through the operation of construction equipment and from worker and builder supply vendor vehicles, each of which typically use fossil-based fuels to operate. The combustion of fossil-based fuels creates GHGs such as CO_2, CH_4, and N_2O. Furthermore, CH_4 is emitted during the fueling of heavy equipment. Exhaust emissions from on-site construction activities would vary daily as construction activity levels change.

The SJVAPCD does not have an adopted threshold of significance for construction-related GHG emissions. However, lead agencies are encouraged to quantify and disclose GHG emissions that would occur during construction. Using CalEEMod, it is estimated that the annual emissions associated with construction of the proposed project would be approximately 556.2 metric tons (MT) CO_2e. Construction GHG emissions were amortized over the life of the project (assumed to be 30 years) and added to the operational emissions. When amortized over the life of the project, construction emissions would be approximately 18.5 MT CO_2e per year.

Operational Emissions. Long-term GHG emissions are typically generated from mobile sources (e.g., vehicle trips), area sources (e.g., maintenance activities and landscaping), indirect emissions from sources associated with energy consumption, waste sources (land filling and waste disposal), and water sources (water supply and conveyance, treatment, and distribution). Mobile-source GHG emissions would result from project-generated vehicle trips. Area sources include activities such as on-site landscaping and maintenance, while energy-related emissions would occur off site from increased electricity demand. Waste-related emissions would be generated from the transport and disposal of project waste, including landfilling. Water-related emissions would result from water supply, conveyance, treatment, distribution, and wastewater treatment associated with the project.

Following guidance from the SJVAPCD, GHG emissions for operation of the project were calculated using CalEEMod. Based on the analysis results, summarized in Table E, the proposed project would result in emissions of approximately 160.1 MT CO_2e per year. These estimated emissions are provided for informational purposes, and the significance of the proposed project is further analyzed below. See Attachment A to this memorandum for CalEEMod output sheets.

Table E: Project Greenhouse Gas Emissions

Emission Type	Operational Emissions (MT CO_2e per Year)
Mobile Sources	3.9
Area Sources	5.3
Energy Sources	124.7
Water Sources	0.1
Waste Sources	0.0
Refrigeration	7.6
Stationary	3.9
Amortized Construction Emissions	18.5
Total Operational Emissions	**160.1**

Source: Compiled by LSA (April 2026).
CO_2e = carbon dioxide equivalent
MT = metric tons

Consistency with Greenhouse Gas Reduction Plans

As discussed above, the SJVAPCD has not established a numeric threshold of significance for GHG emissions. The significance of GHG emissions may be evaluated based on locally adopted quantitative thresholds or consistency with a regional GHG reduction plan (e.g., a Climate Action Plan). For this analysis, a less than significant GHG impact would occur if the project were determined to be consistent with the goals set forth in the relevant GHG reduction plans, which were determined to be the 2022 Scoping Plan and the Fresno COG 2022 RTP/SCS. An evaluation of the proposed project's consistency with the foregoing plans is provided below.

2022 Scoping Plan. EO B-30-15 established an interim target of reducing GHG emissions to 40 percent below 1990 levels by 2030, which was subsequently codified by SB 32, building on the earlier targets established under AB 32 and supporting the State's long-term goal of reducing emissions to 80 percent below 1990 levels by 2050. AB 197, a companion to SB 32, provides additional direction to CARB that is related to the adoption of strategies to reduce GHG emissions. AB 1279 codifies the State goals of achieving net carbon neutrality by 2045 and maintaining net negative GHG emissions thereafter.

CARB's Scoping Plans serve as the primary roadmap for achieving these statewide GHG reduction targets. The 2017 Scoping Plan was developed to align with the 2030 target established by EO B-30-15 and SB 32, while the 2022 Scoping Plan evaluates progress toward the 2030 goal and outlines a pathway to carbon neutrality by 2045.[25] The 2022 Scoping Plan emphasizes strategies across sectors, including clean energy, technology deployment, and natural and working lands, to achieve long-term climate objectives while advancing economic, environmental, public health, and environmental justice priorities. Chapter 4 of the 2022 Scoping Plan lists the key sectors and strategies for achieving carbon neutrality. The proposed project is evaluated for consistency with the key sectors in Table F.

[25] SJVAPCD. 2024. *Current District Rules and Regulations*. Website: https://ww2.valleyair.org/rules-and-planning/current-district-rules-and-regulations (accessed April 2026).

Table F: Project Consistency with 2022 Scoping Plan

Sector	Consistency Discussion
Transportation Sustainability: This section focuses on reducing fossil fuel consumption through widespread deployment of zero-emission vehicles, mode shift, and land use strategies that reduce VMT.	**Consistent.** The proposed parking facility would not independently generate substantial new vehicle trips; instead, it would accommodate vehicle trips associated with existing and planned surrounding land uses. As such, the project would not introduce new sources of operational GHG emissions beyond those already projected to occur in the 2022 Scoping Plan. In addition, the project would include EV chargers to support the transition to and use of zero-emission vehicles. Therefore, implementation of the project would be consistent with the transportation sustainability measures set forth in the 2022 Scoping Plan.
Clean Electricity Grid: This section emphasizes the transition to a fully decarbonized electric grid through expansion of renewable energy, energy storage, and transmission infrastructure.	**Consistent.** Electricity demand for the proposed project would be met through PG&E, which is required to comply with SB 350 and the renewable portfolio standards set forth in SB 100. Electricity delivered by PG&E in 2024 was generated by 98% zero-carbon sources.[26] Therefore, electricity use associated with implementation of the proposed project would be primarily carbon-free, and the project would be consistent with measures to transition to a fully decarbonized electric grid.
Sustainable Manufacturing and Buildings: This section targets electrification and energy efficiency in industrial processes and industrial buildings.	**Not Applicable.** Actions related to this sector are not relevant to the proposed parking structure project. Nevertheless, implementation of the proposed project would not conflict with statewide implementation of measures to electrify industrial processes and buildings.
Carbon Dioxide Removal and Capture: This section focuses on technologies and strategies to remove and store carbon, including direct air capture and carbon capture and sequestration, to ultimately achieve carbon neutrality.	**Not Applicable.** Actions related to this sector are not relevant to the proposed parking structure project. Nevertheless, implementation of the proposed project would not conflict with statewide implementation of carbon capture technologies and strategies.
Short-Lived Climate Pollutants: This section prioritizes reductions in the use of short-lived climate pollutants, which include methane, refrigerants, and other high-impact pollutants, through improved waste management, agricultural practices, and industrial controls.	**Not Applicable.** Actions related to this sector are not relevant to the proposed parking structure project. The proposed structure would not involve the use of refrigerants or other high-impact pollutants. Nevertheless, implementation of the proposed project would not conflict with statewide implementation of measures to reduce the use of short-lived climate pollutants.
Natural and Working Lands: This section promotes land management practices that reduce emissions and increase carbon sequestration, including conservation, restoration, and climate-smart agriculture.	**Not Applicable.** Actions related to this sector are not relevant to the proposed parking structure project. Nevertheless, implementation of the proposed project would not conflict with statewide implementation of land management practices related to natural and working lands.

Source: Compiled by LSA (April 2026).
EV = electric vehicle
GHG = greenhouse gas
PG&E = Pacific Gas and Electric Company
SB = Senate Bill
VMT = vehicle miles traveled

[26] California Energy Commission (CEC). Annual Power Content Labels for 2024. Website: https://www.energy.ca.gov/filebrowser/download/9145 (accessed April 2026).

Overall, based on the analysis presented in Table F, the proposed project would not conflict with implementation of measures identified in the 2022 Scoping Plan, as it would not induce additional travel demand or land use growth, and would provide charging infrastructure to support zero-emission vehicle adoption and usage. Therefore, the proposed project would not interfere with the State's ability to achieve its near-term or long-term GHG reduction targets.

2022 Regional Transportation Plan/Sustainable Communities Strategy. The Fresno COG RTP reflects transportation planning for Fresno County through 2046. The vision, goals, and policies in the 2022 RTP are intended to serve as the foundation for both short- and long-term planning and guide implementation activities. The core vision in the 2022 RTP is to create a region of diverse, safe, resilient, and accessible transportation options that improve the quality of life for all residents by fostering sustainability, equity, a vibrant economy, clean air, and healthy communities. The 2022 RTP contains transportation projects to help more efficiently distribute population, housing, and employment growth, and forecast development that is generally consistent with regional-level General Plan data. The actions in the 2022 RTP address all transportation modes (i.e., highways, local streets and roads, mass transportation, rail, bicycle, and aviation facilities and services) and consist of short- and long-term activities that address regional transportation needs. Although the actions are organized by the five key policy areas, many of them are cross-cutting and support multiple goals and policies. Some actions are intended to support the SCS and reduce GHG emissions directly, while others are focused on the RTP's broader goals. The 2022 RTP does not require that local General Plans, Specific Plans, or zoning be consistent with the 2022 RTP, but it provides incentives for consistency for governments and developers.

As noted previously, the proposed project consists of a parking facility that would not independently generate substantial new vehicle trips but would instead accommodate vehicle trips associated with existing and planned surrounding land uses. As such, the project would not introduce new trip-generating land uses beyond what is already anticipated in the RTP. In addition, the project would include EV chargers to support the use and adoption of zero-emission vehicles. Finally, it is noted that the proposed project is generally consistent with the land use designation for the project site and with the City's long-range planning efforts. Because the project supports access to nearby uses without notably increasing overall trip generation and would provide charging infrastructure to support the use of zero-emission vehicles, the proposed project would not interfere with the Fresno COG's ability to achieve regional GHG reduction targets or implement the strategies outlined in the 2022 RTP.

Summary

Based on the discussion above, the proposed project would be consistent with applicable plans and programs designed to reduce GHG emissions. Therefore, the proposed project would not conflict with plans, policies, or regulations adopted for the purpose of reducing GHG emissions.

CONCLUSION

Based on the analysis presented above, construction and operation of the proposed project would not result in the generation of criteria air pollutants that would exceed SJVAPCD thresholds of significance. Compliance with RCM AIR-1, which requires the implementation of SJVAPCD Regulation

VIII, would further reduce potential dust impacts during construction. Construction and operations of the proposed project is not expected to generate significant TAC emissions that would adversely affect nearby sensitive receptors, and the proposed project would also not result in other emissions (e.g., those leading to odors) that affect a substantial number of people. GHG emissions associated with construction and operation of the proposed project would be less than significant, and the project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.

Attachment: A: CalEEMod Output Files

ATTACHMENT A

CALEEMOD OUTPUT FILES

H Street Parking Custom Report

Table of Contents

1. Basic Project Information

1.1. Basic Project Information

1.2. Land Use Types

1.3. User-Selected Emission Reduction Measures by Emissions Sector

2. Emissions Summary

2.1. Construction Emissions Compared Against Thresholds

2.2. Construction Emissions by Year

2.2.1. Total Construction Emissions by Year, Unmitigated

2.2.2. Onsite Construction Emissions by Year, Unmitigated

2.2.3. Offsite Construction Emissions by Year, Unmitigated

2.3. Operations Emissions Compared Against Thresholds

2.4. Operations Emissions by Sector, Unmitigated

3. Construction Emissions Details

3.1. Demolition (2026)

3.1.1. Onsite - Unmitigated

3.1.2. Offsite - Unmitigated

3.2. Grading (2026)

3.2.1. Onsite - Unmitigated

3.2.2. Offsite - Unmitigated

3.3. Building Construction (2026)

3.3.1. Onsite - Unmitigated

3.3.2. Offsite - Unmitigated

3.4. Building Construction (2027)

3.4.1. Onsite - Unmitigated

3.4.2. Offsite - Unmitigated

3.5. Paving (2027)

3.5.1. Onsite - Unmitigated

3.5.2. Offsite - Unmitigated

3.6. Architectural Coating (2027)

3.6.1. Onsite - Unmitigated

3.6.2. Offsite - Unmitigated

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

4.3. Area Emissions by Source

4.3.1. Unmitigated

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

5. Activity Data

5.1. Construction Schedule

5.2. Off-Road Equipment

5.2.1. Unmitigated

5.3. Construction Vehicles

5.3.1. Unmitigated

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

5.5. Architectural Coatings

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

5.6.2. Construction Earthmoving Control Strategies

5.7. Construction Paving

5.8. Construction Electricity Consumption and Emissions Factors

5.9. Operational Mobile Sources

5.9.1. Unmitigated

5.10. Operational Area Sources

5.10.1. Hearths

5.10.2. Architectural Coatings

5.10.3. Landscape Equipment

5.11. Operational Energy Consumption

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

8. User Changes to Default Data

8.1. Justifications

8.3. Land Use

8.4. Construction

8.4.1. Construction Phases

8.4.2. Off-Road Equipment

8.4.4. Dust from Material Movement

8.5. Operations

8.5.1. Mobile Sources

8.5.1.1. Vehicle Data

8.5.8. Stationary Sources

8.5.8.1. Emergency Generators and Fire Pumps

1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	H Street Parking
Construction Start Date	6/1/2026
Operational Year	2028
Lead Agency	—
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	2.70000
Precipitation (days)	25.4000
Location	1645 Mono St, Fresno, CA 93706, USA
County	Fresno
City	Fresno
Air District	San Joaquin Valley APCD
Air Basin	San Joaquin Valley
TAZ	2478
EDFZ	5
Electric Utility	Pacific Gas & Electric Company
Gas Utility	Pacific Gas & Electric
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
Enclosed Parking with Elevator	904.000	Space	2.26000	361,600	20,572.0	—	—	—

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.	2.88659	2.57137	16.1283	19.8767	0.03695	0.62380	3.02117	3.64497	0.57507	1.40364	1.97871	—	4,457.52	4,457.52	0.14860	0.30023	4.96273	4,555.06
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	2.80633	2.46018	13.2269	18.8093	0.03208	0.41235	1.19034	1.58259	0.38020	0.28734	0.64905	—	4,163.21	4,163.21	0.15876	0.17682	0.12877	4,220.00
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.18190	1.03731	6.11734	8.65041	0.01486	0.18808	0.52102	0.68829	0.17341	0.15683	0.31114	—	1,913.34	1,913.34	0.06908	0.07856	0.91812	1,939.39
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.21570	0.18931	1.11641	1.57870	0.00271	0.03432	0.09509	0.12561	0.03165	0.02862	0.05678	—	316.775	316.775	0.01144	0.01301	0.15200	321.089

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	2.28555	1.96072	16.1283	18.2542	0.03695	0.62380	3.02117	3.64497	0.57507	1.40364	1.97871	—	4,457.52	4,457.52	0.14860	0.30023	4.91624	4,555.06
2027	2.88659	2.57137	13.0691	19.8767	0.03208	0.39225	1.19034	1.58259	0.36171	0.28734	0.64905	—	4,280.27	4,280.27	0.14671	0.17280	4.96273	4,340.40
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	2.19223	1.88983	12.8211	17.2856	0.03035	0.41235	1.02509	1.43744	0.38020	0.24861	0.62881	—	3,905.67	3,905.67	0.14665	0.17313	0.12744	3,961.06
2027	2.80633	2.46018	13.2269	18.8093	0.03208	0.39225	1.19034	1.58259	0.36171	0.28734	0.64905	—	4,163.21	4,163.21	0.15876	0.17682	0.12877	4,220.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	0.74637	0.63323	4.84503	6.03766	0.01108	0.16726	0.52102	0.68829	0.15430	0.15683	0.31114	—	1,398.08	1,398.08	0.05026	0.06655	0.67083	1,419.83
2027	1.18190	1.03731	6.11734	8.65041	0.01486	0.18808	0.49656	0.68464	0.17341	0.12002	0.29342	—	1,913.34	1,913.34	0.06908	0.07856	0.91812	1,939.39
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	0.13621	0.11556	0.88422	1.10187	0.00202	0.03053	0.09509	0.12561	0.02816	0.02862	0.05678	—	231.467	231.467	0.00832	0.01102	0.11106	235.070
2027	0.21570	0.18931	1.11641	1.57870	0.00271	0.03432	0.09062	0.12495	0.03165	0.02190	0.05355	—	316.775	316.775	0.01144	0.01301	0.15200	321.089

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	1.71745	1.44660	14.0391	15.6056	0.02523	0.61031	2.76406	3.37436	0.56158	1.33593	1.89750	—	2,635.58	2,635.58	0.10691	0.02138	0.00000	2,644.63
2027	2.12316	1.84492	11.5574	13.5788	0.02685	0.38180	0.00000	0.38180	0.35126	0.00000	0.35126	—	2,472.32	2,472.32	0.10029	0.02006	0.00000	2,480.80
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	1.57964	1.31489	11.1412	12.5106	0.02513	0.40190	0.00000	0.40190	0.36975	0.00000	0.36975	—	2,338.85	2,338.85	0.09487	0.01897	0.00000	2,346.87
2027	2.12316	1.84492	11.5574	13.5788	0.02685	0.38180	0.00000	0.38180	0.35126	0.00000	0.35126	—	2,472.32	2,472.32	0.10029	0.02006	0.00000	2,480.80

Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	0.57572	0.48092	4.28104	4.76307	0.00889	0.16211	0.22858	0.39069	0.14915	0.08488	0.23403	—	863.402	863.402	0.03502	0.00700	0.00000	866.365
2027	0.89011	0.76166	5.41004	6.42283	0.01251	0.18337	0.00000	0.18337	0.16870	0.00000	0.16870	—	1,168.25	1,168.25	0.04739	0.00948	0.00000	1,172.26
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	0.10507	0.08777	0.78129	0.86926	0.00162	0.02959	0.04172	0.07130	0.02722	0.01549	0.04271	—	142.946	142.946	0.00580	0.00116	0.00000	143.437
2027	0.16244	0.13900	0.98733	1.17217	0.00228	0.03347	0.00000	0.03347	0.03079	0.00000	0.03079	—	193.417	193.417	0.00785	0.00157	0.00000	194.080

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	0.70591	0.64583	2.08912	5.74367	0.01171	0.03347	1.02509	1.03554	0.03347	0.24861	0.25906	—	1,821.93	1,821.93	0.04508	0.27885	4.91624	1,910.43
2027	0.76343	0.72645	1.51173	6.29789	0.00523	0.01045	1.19034	1.20079	0.01045	0.28734	0.29779	—	1,807.95	1,807.95	0.04642	0.15275	4.96273	1,859.60
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	0.61259	0.57494	1.67988	4.77509	0.00523	0.01045	1.02509	1.03554	0.01045	0.24861	0.25906	—	1,566.82	1,566.82	0.05177	0.15415	0.12744	1,614.18
2027	0.68317	0.61526	1.66947	5.23047	0.00523	0.01045	1.19034	1.20079	0.01045	0.28734	0.29779	—	1,690.89	1,690.89	0.05847	0.15676	0.12877	1,739.20
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	0.17064	0.15231	0.56399	1.27460	0.00219	0.00515	0.29244	0.29759	0.00515	0.07195	0.07710	—	534.674	534.674	0.01524	0.05954	0.67083	553.470
2027	0.29179	0.27565	0.70730	2.22758	0.00235	0.00470	0.49656	0.50126	0.00470	0.12002	0.12472	—	745.092	745.092	0.02169	0.06908	0.91812	767.137
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	0.03114	0.02780	0.10293	0.23261	0.00040	0.00094	0.05337	0.05431	0.00094	0.01313	0.01407	—	88.5214	88.5214	0.00252	0.00986	0.11106	91.6332
2027	0.05325	0.05031	0.12908	0.40653	0.00043	0.00086	0.09062	0.09148	0.00086	0.02190	0.02276	—	123.358	123.358	0.00359	0.01144	0.15200	127.008

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.	4.27442	3.92787	3.81290	19.1708	0.00749	0.22123	0.02053	0.24176	0.21441	0.00521	0.21961	0.00000	1,507.24	1,507.24	0.15137	0.02163	0.06974	1,517.54
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.47388	1.34311	3.68212	3.43133	0.00653	0.19330	0.02053	0.21383	0.19329	0.00521	0.19850	0.00000	1,440.53	1,440.53	0.14881	0.02116	0.00181	1,450.56
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.51071	1.39447	0.32860	8.06867	0.00112	0.02718	0.02019	0.04737	0.02381	0.00512	0.02893	0.00000	847.387	847.387	0.12495	0.01649	0.03011	855.453
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.27571	0.25449	0.05997	1.47253	0.00020	0.00496	0.00368	0.00865	0.00434	0.00093	0.00528	0.00000	140.295	140.295	0.02069	0.00273	0.00499	141.630

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	0.01443	0.01354	0.01120	0.09658	0.00024	0.00018	0.02053	0.02070	0.00017	0.00521	0.00537	—	24.5981	24.5981	0.00095	0.00118	0.06974	25.0424
Area	2.81749	2.60165	0.13232	15.7267	0.00094	0.02793	—	0.02793	0.02112	—	0.02112	—	64.6709	64.6709	0.00271	0.00055	—	64.9041
Energy	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	—	0.00000	—	745.975	745.975	0.12068	0.01463	—	753.351
Water	—	—	—	—	—	—	—	—	—	—	—	0.00000	0.38188	0.38188	0.00006	0.00001	—	0.38566
Waste	—	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000
Stationary	1.44250	1.31268	3.66937	3.34750	0.00631	0.19312	0.00000	0.19312	0.19312	0.00000	0.19312	0.00000	671.611	671.611	0.02697	0.00526	0.00000	673.853
Total	4.27442	3.92787	3.81290	19.1708	0.00749	0.22123	0.02053	0.24176	0.21441	0.00521	0.21961	0.00000	1,507.24	1,507.24	0.15137	0.02163	0.06974	1,517.54

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.01300	0.01206	0.01275	0.08383	0.00022	0.00018	0.02053	0.02070	0.00017	0.00521	0.00537	—	22.5604	22.5604	0.00110	0.00126	0.00181	22.9651
Area	0.01837	0.01837	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Energy	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	—	0.00000	—	745.975	745.975	0.12068	0.01463	—	753.351
Water	—	—	—	—	—	—	—	—	—	—	—	0.00000	0.38188	0.38188	0.00006	0.00001	—	0.38566
Waste	—	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000
Stationary	1.44250	1.31268	3.66937	3.34750	0.00631	0.19312	0.00000	0.19312	0.19312	0.00000	0.19312	0.00000	671.611	671.611	0.02697	0.00526	0.00000	673.853
Total	1.47388	1.34311	3.68212	3.43133	0.00653	0.19330	0.02053	0.21383	0.19329	0.00521	0.19850	0.00000	1,440.53	1,440.53	0.14881	0.02116	0.00181	1,450.56
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.01315	0.01225	0.01202	0.08376	0.00023	0.00018	0.02019	0.02037	0.00017	0.00512	0.00529	—	23.1363	23.1363	0.00102	0.00122	0.03011	23.5544
Area	1.39876	1.29232	0.06526	7.75562	0.00046	0.01378	—	0.01378	0.01041	—	0.01041	—	31.8925	31.8925	0.00134	0.00027	—	32.0075
Energy	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	—	0.00000	—	745.975	745.975	0.12068	0.01463	—	753.351
Water	—	—	—	—	—	—	—	—	—	—	—	0.00000	0.38188	0.38188	0.00006	0.00001	—	0.38566
Waste	—	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000
Stationary	0.09880	0.08991	0.25133	0.22928	0.00043	0.01323	0.00000	0.01323	0.01323	0.00000	0.01323	0.00000	46.0008	46.0008	0.00185	0.00036	0.00000	46.1543
Total	1.51071	1.39447	0.32860	8.06867	0.00112	0.02718	0.02019	0.04737	0.02381	0.00512	0.02893	0.00000	847.387	847.387	0.12495	0.01649	0.03011	855.453
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.00240	0.00223	0.00219	0.01529	0.00004	0.00003	0.00368	0.00372	0.00003	0.00093	0.00096	—	3.83047	3.83047	0.00017	0.00020	0.00499	3.89970
Area	0.25527	0.23585	0.01191	1.41540	0.00008	0.00251	—	0.00251	0.00190	—	0.00190	—	5.28017	5.28017	0.00022	0.00005	—	5.29921
Energy	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	—	0.00000	—	123.505	123.505	0.01998	0.00242	—	124.726
Water	—	—	—	—	—	—	—	—	—	—	—	0.00000	0.06322	0.06322	0.00001	< 0.000005	—	0.06385
Waste	—	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000
Stationary	0.01803	0.01641	0.04587	0.04184	0.00008	0.00241	0.00000	0.00241	0.00241	0.00000	0.00241	0.00000	7.61595	7.61595	0.00031	0.00006	0.00000	7.64138
Total	0.27571	0.25449	0.05997	1.47253	0.00020	0.00496	0.00368	0.00865	0.00434	0.00093	0.00528	0.00000	140.295	140.295	0.02069	0.00273	0.00499	141.630

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	1.68109	1.41312	14.0391	15.6056	0.02523	0.53967	—	0.53967	0.49659	—	0.49659	—	2,635.58	2,635.58	0.10691	0.02138	—	2,644.63
Demolition	—	—	—	—	—	—	1.40752	1.40752	—	0.21314	0.21314	—	—	—	—	—	—	—
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	0.09211	0.07743	0.76927	0.85510	0.00138	0.02957	—	0.02957	0.02721	—	0.02721	—	144.415	144.415	0.00586	0.00117	—	144.911
Demolition	—	—	—	—	—	—	0.07712	0.07712	—	0.01168	0.01168	—	—	—	—	—	—	—
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 Equipm	0.01681	0.01413	0.14039	0.15606	0.00025	0.00540	—	0.00540	0.00497	—	0.00497	—	23.9096	23.9096	0.00097	0.00019	—	23.9917
Demolition	—	—	—	—	—	—	0.01408	0.01408	—	0.00213	0.00213	—	—	—	—	—	—	—
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	0.06353	0.05966	0.03095	0.51373	0.00000	0.00000	0.08161	0.08161	0.00000	0.01913	0.01913	—	89.0466	89.0466	0.00265	0.00387	0.30914	90.5749
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	0.07195	0.03124	2.05817	0.50813	0.01171	0.03347	0.46906	0.50253	0.03347	0.12842	0.16189	—	1,732.89	1,732.89	0.03904	0.27498	4.05186	1,819.86
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00317	0.00296	0.00187	0.02319	0.00000	0.00000	0.00440	0.00440	0.00000	0.00103	0.00103	—	4.48657	4.48657	0.00016	0.00021	0.00730	4.56112
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	0.00388	0.00165	0.11761	0.02806	0.00064	0.00183	0.02538	0.02722	0.00183	0.00696	0.00879	—	94.9787	94.9787	0.00214	0.01507	0.09615	99.6184
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00058	0.00054	0.00034	0.00423	0.00000	0.00000	0.00080	0.00080	0.00000	0.00019	0.00019	—	0.74280	0.74280	0.00003	0.00004	0.00121	0.75515
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	0.00071	0.00030	0.02146	0.00512	0.00012	0.00033	0.00463	0.00497	0.00033	0.00127	0.00160	—	15.7248	15.7248	0.00035	0.00249	0.01592	16.4930

3.2. Grading (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	1.71745	1.44660	13.9545	15.0229	0.02397	0.61031	—	0.61031	0.56158	—	0.56158	—	2,596.68	2,596.68	0.10533	0.02107	—	2,605.59
Dust From Material Movement	—	—	—	—	—	—	2.76406	2.76406	—	1.33593	1.33593	—	—	—	—	—	—	—
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	0.09411	0.07927	0.76463	0.82317	0.00131	0.03344	—	0.03344	0.03077	—	0.03077	—	142.284	142.284	0.00577	0.00115	—	142.772
Dust From Material Movement	—	—	—	—	—	—	0.15146	0.15146	—	0.07320	0.07320	—	—	—	—	—	—	—
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	0.01717	0.01447	0.13954	0.15023	0.00024	0.00610	—	0.00610	0.00562	—	0.00562	—	23.5567	23.5567	0.00096	0.00019	—	23.6376

Dust From Material Movement	—	—	—	—	—	—	0.02764	0.02764	—	0.01336	0.01336	—	—	—	—	—	—	—
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	0.05294	0.04971	0.02579	0.42811	0.00000	0.00000	0.06800	0.06800	0.00000	0.01594	0.01594	—	74.2055	74.2055	0.00220	0.00322	0.25762	75.4791
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	0.02901	0.01259	0.82978	0.20486	0.00472	0.01349	0.18911	0.20260	0.01349	0.05177	0.06527	—	698.634	698.634	0.01574	0.11086	1.63356	733.698
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00264	0.00247	0.00156	0.01933	0.00000	0.00000	0.00367	0.00367	0.00000	0.00086	0.00086	—	3.73880	3.73880	0.00014	0.00018	0.00609	3.80094
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	0.00156	0.00067	0.04741	0.01131	0.00026	0.00074	0.01023	0.01097	0.00074	0.00280	0.00354	—	38.2918	38.2918	0.00086	0.00607	0.03876	40.1624
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00048	0.00045	0.00028	0.00353	0.00000	0.00000	0.00067	0.00067	0.00000	0.00016	0.00016	—	0.61900	0.61900	0.00002	0.00003	0.00101	0.62929
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	0.00029	0.00012	0.00865	0.00206	0.00005	0.00013	0.00187	0.00200	0.00013	0.00051	0.00065	—	6.33964	6.33964	0.00014	0.00101	0.00642	6.64934

3.3. Building Construction (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	1.57964	1.31489	11.1412	12.5106	0.02513	0.40190	—	0.40190	0.36975	—	0.36975	—	2,338.85	2,338.85	0.09487	0.01897	—	2,346.87
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	1.57964	1.31489	11.1412	12.5106	0.02513	0.40190	—	0.40190	0.36975	—	0.36975	—	2,338.85	2,338.85	0.09487	0.01897	—	2,346.87
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	0.38950	0.32422	2.74714	3.08480	0.00620	0.09910	—	0.09910	0.09117	—	0.09117	—	576.702	576.702	0.02339	0.00468	—	578.681
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	0.07108	0.05917	0.50135	0.56298	0.00113	0.01809	—	0.01809	0.01664	—	0.01664	—	95.4797	95.4797	0.00387	0.00077	—	95.8073
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	0.64319	0.60402	0.31339	5.20144	0.00000	0.00000	0.82623	0.82623	0.00000	0.19367	0.19367	—	901.579	901.579	0.02679	0.03917	3.13002	917.053
Vendor	0.06272	0.04181	1.21383	0.54224	0.00523	0.01045	0.19885	0.20931	0.01045	0.05494	0.06539	—	764.917	764.917	0.01829	0.11498	1.78622	801.425
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	0.55379	0.53705	0.38504	4.20802	0.00000	0.00000	0.82623	0.82623	0.00000	0.19367	0.19367	—	800.426	800.426	0.03348	0.03917	0.08111	813.018
Vendor	0.05880	0.03789	1.29484	0.56706	0.00523	0.01045	0.19885	0.20931	0.01045	0.05494	0.06539	—	766.396	766.396	0.01829	0.11498	0.04634	801.164
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	0.14456	0.13490	0.08528	1.05675	0.00000	0.00000	0.20041	0.20041	0.00000	0.04692	0.04692	—	204.415	204.415	0.00743	0.00966	0.33271	207.812
Vendor	0.01482	0.00967	0.31025	0.13596	0.00129	0.00258	0.04836	0.05094	0.00258	0.01338	0.01596	—	188.763	188.763	0.00451	0.02835	0.18981	197.515
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	0.02638	0.02462	0.01556	0.19286	0.00000	0.00000	0.03657	0.03657	0.00000	0.00856	0.00856	—	33.8433	33.8433	0.00123	0.00160	0.05508	34.4057
Vendor	0.00270	0.00176	0.05662	0.02481	0.00024	0.00047	0.00883	0.00930	0.00047	0.00244	0.00291	—	31.2519	31.2519	0.00075	0.00469	0.03143	32.7008
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 (2027)

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	1.51859	1.26415	10.7262	12.4535	0.02513	0.36275	—	0.36275	0.33373	—	0.33373	—	2,338.80	2,338.80	0.09487	0.01897	—	2,346.83
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	1.51859	1.26415	10.7262	12.4535	0.02513	0.36275	—	0.36275	0.33373	—	0.33373	—	2,338.80	2,338.80	0.09487	0.01897	—	2,346.83
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	0.68351	0.56899	4.82785	5.60527	0.01131	0.16327	—	0.16327	0.15021	—	0.15021	—	1,052.69	1,052.69	0.04270	0.00854	—	1,056.30
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	0.12474	0.10384	0.88108	1.02296	0.00206	0.02980	—	0.02980	0.02741	—	0.02741	—	174.285	174.285	0.00707	0.00141	—	174.883
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	0.58393	0.57053	0.28091	4.80836	0.00000	0.00000	0.82623	0.82623	0.00000	0.19367	0.19367	—	882.782	882.782	0.02344	0.03583	2.82770	896.872
Vendor	0.06272	0.04181	1.17463	0.52787	0.00523	0.01045	0.19885	0.20931	0.01045	0.05494	0.06539	—	748.616	748.616	0.01829	0.10975	1.56948	783.350
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	0.52031	0.48114	0.34922	3.90032	0.00000	0.00000	0.82623	0.82623	0.00000	0.19367	0.19367	—	783.972	783.972	0.03348	0.03917	0.07337	796.556
Vendor	0.05880	0.03789	1.25041	0.55008	0.00523	0.01045	0.19885	0.20931	0.01045	0.05494	0.06539	—	750.125	750.125	0.01829	0.10975	0.04073	783.330
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	0.23720	0.23118	0.14106	1.77934	0.00000	0.00000	0.36582	0.36582	0.00000	0.08565	0.08565	—	365.439	365.439	0.01206	0.01763	0.54925	371.544
Vendor	0.02705	0.01764	0.54987	0.24171	0.00235	0.00470	0.08827	0.09298	0.00470	0.02442	0.02913	—	337.235	337.235	0.00823	0.04940	0.30511	352.467
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	0.04329	0.04219	0.02574	0.32473	0.00000	0.00000	0.06676	0.06676	0.00000	0.01563	0.01563	—	60.5026	60.5026	0.00200	0.00292	0.09094	61.5133
Vendor	0.00494	0.00322	0.10035	0.04411	0.00043	0.00086	0.01611	0.01697	0.00086	0.00446	0.00532	—	55.8331	55.8331	0.00136	0.00818	0.05051	58.3550
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. Paving (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	0.77224	0.64798	5.74049	8.20011	0.01181	0.23023	—	0.23023	0.21181	—	0.21181	—	1,243.85	1,243.85	0.05046	0.01009	—	1,248.12
Paving	0.23685	0.23685	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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-Roa d Equipm ent	0.05289	0.04438	0.39318	0.56165	0.00081	0.01577	—	0.01577	0.01451	—	0.01451	—	85.1955	85.1955	0.00346	0.00069	—	85.4878
Paving	0.01622	0.01622	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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	0.00965	0.00810	0.07176	0.10250	0.00015	0.00288	—	0.00288	0.00265	—	0.00265	—	14.1051	14.1051	0.00057	0.00011	—	14.1535
Paving	0.00296	0.00296	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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	0.05767	0.05635	0.02775	0.47491	0.00000	0.00000	0.08161	0.08161	0.00000	0.01913	0.01913	—	87.1901	87.1901	0.00231	0.00354	0.27929	88.5817
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	0.00357	0.00347	0.00212	0.02674	0.00000	0.00000	0.00550	0.00550	0.00000	0.00129	0.00129	—	5.49248	5.49248	0.00018	0.00027	0.00826	5.58424
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	0.00065	0.00063	0.00039	0.00488	0.00000	0.00000	0.00100	0.00100	0.00000	0.00023	0.00023	—	0.90934	0.90934	0.00003	0.00004	0.00137	0.92453
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. Architectural Coating (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	0.13715	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	0.46742	0.46742	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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	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	0.46742	0.46742	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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	0.03119	0.02578	0.18900	0.25591	0.00039	0.00433	—	0.00433	0.00399	—	0.00399	—	30.3604	30.3604	0.00123	0.00025	—	30.4646
Architectural Coatings	0.10629	0.10629	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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	0.00569	0.00470	0.03449	0.04670	0.00007	0.00079	—	0.00079	0.00073	—	0.00073	—	5.02652	5.02652	0.00020	0.00004	—	5.04377
Architectural Coatings	0.01940	0.01940	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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	0.11679	0.11411	0.05618	0.96167	0.00000	0.00000	0.16525	0.16525	0.00000	0.03873	0.03873	—	176.556	176.556	0.00469	0.00717	0.56554	179.374
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	0.10406	0.09623	0.06984	0.78006	0.00000	0.00000	0.16525	0.16525	0.00000	0.03873	0.03873	—	156.794	156.794	0.00670	0.00783	0.01467	159.311
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	0.02397	0.02336	0.01425	0.17979	0.00000	0.00000	0.03696	0.03696	0.00000	0.00865	0.00865	—	36.9252	36.9252	0.00122	0.00178	0.05550	37.5421
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	0.00437	0.00426	0.00260	0.03281	0.00000	0.00000	0.00675	0.00675	0.00000	0.00158	0.00158	—	6.11339	6.11339	0.00020	0.00029	0.00919	6.21552
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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Enclosed Parking with Elevator	0.01443	0.01354	0.01120	0.09658	0.00024	0.00018	0.02053	0.02070	0.00017	0.00521	0.00537	—	24.5981	24.5981	0.00095	0.00118	0.06974	25.0424
Total	0.01443	0.01354	0.01120	0.09658	0.00024	0.00018	0.02053	0.02070	0.00017	0.00521	0.00537	—	24.5981	24.5981	0.00095	0.00118	0.06974	25.0424
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Enclosed Parking with Elevator	0.01300	0.01206	0.01275	0.08383	0.00022	0.00018	0.02053	0.02070	0.00017	0.00521	0.00537	—	22.5604	22.5604	0.00110	0.00126	0.00181	22.9651
Total	0.01300	0.01206	0.01275	0.08383	0.00022	0.00018	0.02053	0.02070	0.00017	0.00521	0.00537	—	22.5604	22.5604	0.00110	0.00126	0.00181	22.9651
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Enclosed Parking with Elevator	0.00240	0.00223	0.00219	0.01529	0.00004	0.00003	0.00368	0.00372	0.00003	0.00093	0.00096	—	3.83047	3.83047	0.00017	0.00020	0.00499	3.89970
Total	0.00240	0.00223	0.00219	0.01529	0.00004	0.00003	0.00368	0.00372	0.00003	0.00093	0.00096	—	3.83047	3.83047	0.00017	0.00020	0.00499	3.89970

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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Enclosed Parking with Elevator	—	—	—	—	—	—	—	—	—	—	—	—	745.975	745.975	0.12068	0.01463	—	753.351
Total	—	—	—	—	—	—	—	—	—	—	—	—	745.975	745.975	0.12068	0.01463	—	753.351
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Enclosed Parking with Elevator	—	—	—	—	—	—	—	—	—	—	—	—	745.975	745.975	0.12068	0.01463	—	753.351
Total	—	—	—	—	—	—	—	—	—	—	—	—	745.975	745.975	0.12068	0.01463	—	753.351
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Enclosed Parking with Elevator	—	—	—	—	—	—	—	—	—	—	—	—	123.505	123.505	0.01998	0.00242	—	124.726
Total	—	—	—	—	—	—	—	—	—	—	—	—	123.505	123.505	0.01998	0.00242	—	124.726

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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Enclosed Parking with Elevator	0.00000	0.00000	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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Enclosed Parking with Elevator	0.00000	0.00000	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	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Enclosed Parking with Elevator	0.00000	0.00000	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	0.00774	0.00774	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Architect Coatings	0.01063	0.01063	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	2.79912	2.58328	0.13232	15.7267	0.00094	0.02793	—	0.02793	0.02112	—	0.02112	—	64.6709	64.6709	0.00271	0.00055	—	64.9041
Total	2.81749	2.60165	0.13232	15.7267	0.00094	0.02793	—	0.02793	0.02112	—	0.02112	—	64.6709	64.6709	0.00271	0.00055	—	64.9041
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.00774	0.00774	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.01063	0.01063	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	0.01837	0.01837	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.00141	0.00141	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.00194	0.00194	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.25192	0.23250	0.01191	1.41540	0.00008	0.00251	—	0.00251	0.00190	—	0.00190	—	5.28017	5.28017	0.00022	0.00005	—	5.29921
Total	0.25527	0.23585	0.01191	1.41540	0.00008	0.00251	—	0.00251	0.00190	—	0.00190	—	5.28017	5.28017	0.00022	0.00005	—	5.29921

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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Enclosed Parking with Elevator	—	—	—	—	—	—	—	—	—	—	—	0.00000	0.38188	0.38188	0.00006	0.00001	—	0.38566
Total	—	—	—	—	—	—	—	—	—	—	—	0.00000	0.38188	0.38188	0.00006	0.00001	—	0.38566
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Enclosed Parking with Elevator	—	—	—	—	—	—	—	—	—	—	—	0.00000	0.38188	0.38188	0.00006	0.00001	—	0.38566
Total	—	—	—	—	—	—	—	—	—	—	—	0.00000	0.38188	0.38188	0.00006	0.00001	—	0.38566
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Enclosed Parking with Elevator	—	—	—	—	—	—	—	—	—	—	—	0.00000	0.06322	0.06322	0.00001	< 0.000005	—	0.06385
Total	—	—	—	—	—	—	—	—	—	—	—	0.00000	0.06322	0.06322	0.00001	< 0.000005	—	0.06385

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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Enclosed Parking with Elevator	—	—	—	—	—	—	—	—	—	—	—	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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Enclosed Parking with Elevator	—	—	—	—	—	—	—	—	—	—	—	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	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Enclosed Parking with Elevator	—	—	—	—	—	—	—	—	—	—	—	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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Emergency Generator	1.44250	1.31268	3.66937	3.34750	0.00631	0.19312	0.00000	0.19312	0.19312	0.00000	0.19312	0.00000	671.611	671.611	0.02697	0.00526	0.00000	673.853
Total	1.44250	1.31268	3.66937	3.34750	0.00631	0.19312	0.00000	0.19312	0.19312	0.00000	0.19312	0.00000	671.611	671.611	0.02697	0.00526	0.00000	673.853
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Emergency Generator	1.44250	1.31268	3.66937	3.34750	0.00631	0.19312	0.00000	0.19312	0.19312	0.00000	0.19312	0.00000	671.611	671.611	0.02697	0.00526	0.00000	673.853
Total	1.44250	1.31268	3.66937	3.34750	0.00631	0.19312	0.00000	0.19312	0.19312	0.00000	0.19312	0.00000	671.611	671.611	0.02697	0.00526	0.00000	673.853
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Emergency Generator	0.01803	0.01641	0.04587	0.04184	0.00008	0.00241	0.00000	0.00241	0.00241	0.00000	0.00241	0.00000	7.61595	7.61595	0.00031	0.00006	0.00000	7.64138
Total	0.01803	0.01641	0.04587	0.04184	0.00008	0.00241	0.00000	0.00241	0.00241	0.00000	0.00241	0.00000	7.61595	7.61595	0.00031	0.00006	0.00000	7.64138

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	7/1/2026	7/28/2026	5.00000	20.0000	—
Grading	Grading	7/30/2026	8/26/2026	5.00000	20.0000	—
Building Construction	Building Construction	8/28/2026	8/18/2027	5.00000	254.000	—
Paving	Paving	8/19/2027	9/22/2027	5.00000	25.0000	—
Architectural Coating	Architectural Coating	3/15/2027	7/7/2027	5.00000	83.0000	—

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
Demolition	Excavators	Diesel	Tier 4 Interim	1.000000	8.00000	36.0000	0.38000
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/Backhoes	Diesel	Average	2.00000	7.00000	84.0000	0.37000
Grading	Excavators	Diesel	Tier 4 Interim	1.000000	8.00000	36.0000	0.38000
Building Construction	Cranes	Diesel	Average	1.000000	8.00000	367.000	0.29000
Building Construction	Forklifts	Diesel	Average	2.00000	7.00000	82.0000	0.20000
Building Construction	Generator Sets	Diesel	Average	1.000000	8.00000	14.0000	0.74000
Building Construction	Tractors/Loaders/Backhoes	Diesel	Average	1.000000	6.00000	84.0000	0.37000
Building Construction	Welders	Diesel	Average	3.00000	8.00000	46.0000	0.45000
Building Construction	Cement and Mortar Mixers	Diesel	Average	1.000000	8.00000	10.00000	0.56000
Building Construction	Pumps	Diesel	Average	1.000000	8.00000	11.0000	0.74000
Paving	Cement and Mortar Mixers	Diesel	Average	1.000000	8.00000	10.00000	0.56000
Paving	Pavers	Diesel	Average	1.000000	8.00000	81.0000	0.42000
Paving	Paving Equipment	Diesel	Average	1.000000	8.00000	89.0000	0.36000
Paving	Rollers	Diesel	Average	2.00000	8.00000	36.0000	0.38000
Paving	Tractors/Loaders/Backhoes	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	15.0000	7.70000	LDA,LDT1,LDT2
Demolition	Vendor	—	4.00000	HHDT,MHDT
Demolition	Hauling	25.3000	20.0000	HHDT
Demolition	Onsite truck	—	—	HHDT
Grading	Worker	12.5000	7.70000	LDA,LDT1,LDT2
Grading	Vendor	—	4.00000	HHDT,MHDT
Grading	Hauling	10.2000	20.0000	HHDT
Grading	Onsite truck	—	—	HHDT
Building Construction	Worker	151.872	7.70000	LDA,LDT1,LDT2
Building Construction	Vendor	59.2662	4.00000	HHDT,MHDT
Building Construction	Hauling	0.00000	20.0000	HHDT
Building Construction	Onsite truck	—	—	HHDT
Paving	Worker	15.0000	7.70000	LDA,LDT1,LDT2
Paving	Vendor	—	4.00000	HHDT,MHDT
Paving	Hauling	0.00000	20.0000	HHDT
Paving	Onsite truck	—	—	HHDT
Architectural Coating	Worker	30.3744	7.70000	LDA,LDT1,LDT2
Architectural Coating	Vendor	—	4.00000	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

Control Strategies Applied	PM10 Reduction	PM2.5 Reduction
Water unpaved roads twice daily	55%	55%
Limit vehicle speeds on unpaved roads to 25 mph	44%	44%

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	4,430.05	492.228	5,906.74

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (Cubic Yards)	Material Exported (Cubic Yards)	Acres Graded (acres)	Material Demolished (Building Square Footage)	Acres Paved (acres)
Demolition	0.00000	0.00000	0.00000	44,000.0	0.00000
Grading	1,625.00	—	6.00000	0.00000	0.00000
Paving	0.00000	0.00000	0.00000	0.00000	2.26000

5.6.2. Construction Earthmoving Control Strategies

Control Strategies Applied	Frequency (per day)	PM10 Reduction	PM2.5 Reduction
Water Exposed Area	2	61%	61%
Water Demolished Area	2	36%	36%

5.7. Construction Paving

Phase Name	Land Use	Area Paved (acres)	% Asphalt
Paving	Enclosed Parking with Elevator	2.26000	100%

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	203.983	0.03300	0.00400
2027	0.00000	203.983	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
Enclosed Parking with Elevator	3.97760	3.97760	3.97760	1,451.82	29.0341	29.0341	29.0341	10,597.4

5.10. Operational Area Sources

5.10.1. Hearths

Land Use	Hearth Type	Unmitigated (number)	Mitigated (number)
Enclosed Parking with Elevator	Wood Fireplaces	0	0
Enclosed Parking with Elevator	Gas Fireplaces	0	0
Enclosed Parking with Elevator	Propane Fireplaces	0	0
Enclosed Parking with Elevator	Electric Fireplaces	0	0
Enclosed Parking with Elevator	No Fireplaces	0	0
Enclosed Parking with Elevator	Conventional Wood Stoves	0	0
Enclosed Parking with Elevator	Catalytic Wood Stoves	0	0
Enclosed Parking with Elevator	Non-Catalytic Wood Stoves	0	0
Enclosed Parking with Elevator	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	4,430.05	492.228	5,906.74

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)
Enclosed Parking with Elevator	1,334,822	203.983	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)
Enclosed Parking with Elevator	0.00000	282,396

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)

Enclosed Parking with Elevator	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

Equipment Type	Fuel Type	Number per Day	Hours per Day	Hours per Year	Horsepower	Load Factor
Emergency Generator	Diesel	1.000000	2.00000	50.0000	400.000	0.73000

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)

8. User Changes to Default Data

8.1. Justifications

Screen	Justification
Land Use	Acreage and landscape square footage updated per site plan
Construction: Construction Phases	Construction phasing provided
Construction: Off-Road Equipment	Per project-specific info, Tier 4 excavators used during demo and grading; and concrete/pump used during building phase
Construction: Dust From Material Movement	import required
Operations: Vehicle Data	Trip rate adjusted per project-specific traffic study
Operations: Emergency Generators and Fire Pumps	gen set

8.3. Land Use

Model Parameter	Units	Default Value	New Value
Lot Area	acre	8.13600	2.26000
Landscape Area	sq. ft	—	20,572.0

8.4. Construction

8.4.1. Construction Phases

Phase Type	Phase Name	Model Parameter	Default Value	New Value
Demolition	Demolition	Start Date	6/1/2026	7/1/2026

Demolition	Demolition	End Date	6/29/2026	7/28/2026
Grading	Grading	Start Date	7/5/2026	7/30/2026
Grading	Grading	End Date	7/13/2026	8/26/2026
Grading	Grading	Work Days per Phase	6.00000	20.0000
Building Construction	Building Construction	Start Date	7/14/2026	8/28/2026
Building Construction	Building Construction	End Date	5/18/2027	8/18/2027
Building Construction	Building Construction	Work Days per Phase	220.000	254.000
Paving	Paving	Start Date	5/19/2027	8/19/2027
Paving	Paving	End Date	6/2/2027	9/22/2027
Paving	Paving	Work Days per Phase	10.00000	25.0000
Architectural Coating	Architectural Coating	Start Date	6/3/2027	3/15/2027
Architectural Coating	Architectural Coating	End Date	6/17/2027	7/7/2027
Architectural Coating	Architectural Coating	Work Days per Phase	10.00000	83.0000

8.4.2. Off-Road Equipment

Phase Name	Equipment Type	Model Parameter	Default Value	New Value
Demolition	Excavators	Engine Tier	Tier 4 Final	Tier 4 Interim
Grading	Excavators	Engine Tier	Tier 4 Final	Tier 4 Interim

8.4.4. Dust from Material Movement

Phase Name	Model Parameter	Units	Default Value	New Value
Grading	Material Imported	Cubic Yards	—	1,625.00
Grading	Total Acres Graded	acres	20.0000	6.00000

8.5. Operations

8.5.1. Mobile Sources

8.5.1.1. Vehicle Data

Land Use	Model Parameter	Units	Default Value	New Value
Enclosed Parking with Elevator	Weekday Trip Rate	size/day	0.00000	0.00440
Enclosed Parking with Elevator	Saturday Trip Rate	size/day	0.00000	0.00440
Enclosed Parking with Elevator	Sunday Trip Rate	size/day	0.00000	0.00440

8.5.8. Stationary Sources

8.5.8.1. Emergency Generators and Fire Pumps

Equipment Type	Model Parameter	Default Value	New Value
Emergency Generator	Hours per Year	100.0000	50.0000