California Environmental Quality Act

Draft Initial Study/Mitigated Negative Declaration

Norseman Elementary School Modernization

State Clearinghouse (SCH) Number: TBD

Fresno Unified School District

2309 Tulare Street
Fresno, CA 93721
https://www.fresnounified.org

Fresno Unified School District

Environmental Consultant

Blair, Church & Flynn

Blair, Church & Flynn Consulting Engineers, Inc.
451 Clovis Avenue, Suite 200
Clovis, CA 93612
www.bcf-engr.com

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Executive Summary

The Fresno Unified School District (District) proposes to implement the Norseman Elementary School Modernization Project using Measure H bond funding. The project would modernize the existing Norseman Elementary School campus through a combination of demolition, reconstruction, and renovation activities designed to replace aging facilities and improve campus functionality, safety, and educational services. The project site encompasses approximately 15.2 acres, including the 12.4-acre Norseman Elementary School campus and approximately 2.8 acres of surrounding City of Fresno public streets and rights-of-way that could be affected by project-related circulation and traffic safety improvements. The project would not increase student enrollment or campus capacity.

The project would replace outdated portable classrooms and permanent buildings that have reached the end of their useful life with new permanent educational and administrative facilities that meet current educational standards, accessibility requirements, building codes, and Division of the State Architect (DSA) requirements. Proposed improvements include construction of new classroom buildings, an early learning building, and an administration building; modernization of existing campus buildings; upgrades to outdoor instructional, recreational, and play areas; and reconfiguration of campus circulation, parking, and student drop-off facilities to improve operational efficiency and safety.

Construction would occur in multiple phases to allow the school to remain operational throughout implementation. The project would include demolition of approximately 27,850 gross square feet (GSF) of existing buildings and construction of approximately 28,500 GSF of new facilities. Upon completion, the campus would contain approximately 64,100 GSF of modernized building space. The project would also increase on-site parking from 116 existing spaces to approximately 175 parking spaces and create improved parent drop-off and pick-up circulation areas.

The project may require limited off-site traffic safety improvements within adjacent public rights-of-way, as determined through coordination with the City of Fresno and applicable safety standards. Potential improvements could include signage, pavement striping, crosswalk enhancements, traffic-calming features, and pedestrian or bicycle safety improvements.

All new and renovated facilities would be designed and constructed in accordance with applicable California Building Standards Code requirements, DSA standards, and state mandates related to energy efficiency, solar photovoltaic systems, battery storage, electric vehicle charging infrastructure, water conservation, seismic safety, fire protection, indoor environmental quality, and drought-tolerant landscaping. Existing utility services would continue to be provided by the City of Fresno, Fresno Metropolitan Flood Control District, and Pacific Gas and Electric Company.

Construction is anticipated to begin in June 2028 and conclude by August 2029. The project would modernize and improve the existing campus while continuing to serve the current student population without expanding enrollment capacity.

The conclusions of the Initial Study are as follows:

1. The Initial Study identified potentially significant environmental effects of the proposed project in the following subject areas: biological resources, cultural resources, geology and soils, greenhouse gas

emissions, noise, transportation, and tribal cultural resources. The District can avoid or reduce these impacts to an insignificant level by incorporating the mitigation measures listed in Table 1 below.

2. The proposed project would have a less than significant impact or no impact on aesthetics, agriculture and forestry resources, air quality, energy resources, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, population and housing, public services, recreation, utilities and service systems, wildfire, and mandatory findings of significance. The Initial Study explains why there would be no impacts, or why the impacts would be less than significant.

3. Based on items 1 and 2, above, the District should adopt a Mitigated Negative Declaration for the proposed project.

TABLE 1: SUMMARY OF MITIGATION MEASURES

BR-1	**Mitigation Measure BR-1: Nesting Bird Avoidance and Minimization.** The nesting bird season is between February 1st and August 31st. Trees are expected to be removed at the project site and should be removed before construction begins to prevent birds from nesting in those trees during construction, and those trees should be removed outside of the nesting bird season. As in, trees should be removed between September 1st and January 31st. Structures proposed for demolition could also be used as nesting habitat. Buildings should also be demolished outside of nesting bird season:
	
	If trees or structures must be removed during the nesting bird season, then a qualified biologist shall perform a pre-construction nesting bird survey to determine whether birds are currently nesting in trees or structures at the project site.
	
	• If there are no active nests in the trees/structures at the project site, then the trees/structures can be removed during the nesting bird season, but no later than 30 days after the nesting bird survey. Another survey shall be conducted once 30 days have passed from the initial survey.
	• If an active nest is observed in the trees/structures at the project site, then those trees/structures shall not be removed until a qualified biologist has determined that the nest is no longer being used or that the fledglings are no longer dependent on the nest.
	  ○ If a biologist is not available for continuous monitoring, then a 250' buffer should be established around the active nest(s) where construction activity is not allowed, aside from vehicle access.
	  ○ Though unlikely, a 500' buffer should be established for any raptor species nests.
	  ○ If a buffer is not feasible, then a qualified biologist shall monitor the nest in the meantime and stop nearby construction activity if they determine that nesting behavior is being negatively affected by that activity.
	  ○ A hybrid approach may be used where a buffer is set around an active bird nest until construction is required near the nest. At this point, a qualified biologist may start to monitor the bird nest.
	• No bird nests shall be removed during the nesting bird season when the nest is active. If a qualified biologist makes the determination that birds are no longer reliant on the nest, then the nest may be removed.

CULT-1	**Mitigation Measure CULT-1: Inadvertent Discovery of Archaeological Resources.** If prehistoric or historic archaeological materials are encountered at any time during ground-disturbing activities, including grading, excavation, trenching, or demolition, all work within 50 feet of the discovery shall stop immediately. The construction contractor shall notify the District, who shall retain a qualified archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards to evaluate the find. The archaeologist shall:

	1. Evaluate whether the resource meets the definition of a historical resource under State CEQA Guidelines Section 15064.5(a) or a unique archaeological resource under Public Resources Code Section 21083.2. 2. Recommend appropriate treatment, which may include preservation in place, avoidance, protective fencing, or data recovery consistent with CEQA Guidelines Section 15126.4(b)(3). 3. Prepare a short letter report documenting the discovery, the evaluation, and the recommended treatment. Work may not resume within the discovery area until the qualified archaeologist determines that the resource has been appropriately treated and the District authorizes resumption of construction. All recovered materials shall be curated at an appropriate curation facility, if required, and all records shall be filed with the California Historical Resources Information System (CHRIS).
CULT-2	**Mitigation Measure CULT-2: Accidental Discovery of Human Remains.** If human remains are discovered during any phase of construction or ground-disturbing activity, all work in the vicinity of the find would immediately stop, and the area would be secured to prevent further disturbance. The construction contractor would promptly notify the County Coroner, who would determine whether the remains are subject to the provisions of California Health and Safety Code Section 7050.5. If the Coroner determines that the remains are of Native American origin, the Coroner would notify the Native American Heritage Commission within 24 hours, as required by Public Resources Code Section 5097.98. The Native American Heritage Commission would then designate a Most Likely Descendant. The project proponent, in consultation with the Most Likely Descendant, would ensure that the remains are treated in accordance with the recommendations of the Most Likely Descendant, which may include reburial in a location not subject to further disturbance or other culturally appropriate measures. Work in the area would not resume until the remains have been appropriately treated and the Coroner and Native American Heritage Commission have provided clearance.
GEO-1	**Mitigation Measure GEO-1**: **Inadvertent Paleontological Resource Discovery.** If paleontological resources are inadvertently discovered during ground-disturbing activities, all work within 50 feet of the discovery shall be halted and the construction supervisor shall immediately notify the District and retain a qualified paleontologist who meets the standards of the Society of Vertebrate Paleontology (Impact Mitigation Guidelines Revision Committee - Society of Vertebrate Paleontology, 2010) to evaluate the find. The paleontologist shall assess the significance of the discovered resource in accordance with CEQA Guidelines Section 15064.5 and SVP guidelines. If the find is determined to be a significant paleontological resource, the paleontologist shall develop and implement a treatment plan in consultation with the lead agency. The treatment plan may include, but is not limited to, recovery and curation of the resource at an accredited repository, documentation of the find, and preparation of a report summarizing the methods and results of the recovery. Ground-disturbing activities in the

	vicinity of the discovery shall not resume until the paleontologist determines that the site has been appropriately managed and cleared for continued work.
GHG-1	**Mitigation Measure GHG-1: Building Electrification and Reduction of Natural Gas Use.** Building design shall prioritize all-electric mechanical equipment and appliances. The project shall limit the installation and use of natural gas infrastructure to the extent feasible and shall incorporate energy-efficient systems that would minimize greenhouse gas emissions associated with building operations.
NOISE-1	**Mitigation Measure NOISE-1: Construction Noise Control and Compliance.** **1. Noise Ordinance Compliance** The Contractor shall comply with all applicable local, city, county, state, and federal laws, ordinances, and regulations governing construction noise at all times. Construction activities shall be limited to allowable hours as specified by the City of Fresno noise ordinances. **2. Construction Scheduling During School Hours** If school is in session during any phase of construction and, in the District's reasonable judgment, construction noise disrupts or interferes with classroom instruction or normal school operations, the Contractor shall, at the District's request, reschedule high-noise activities to occur outside normal instructional hours or implement alternative construction methods. **3. Control of Radios and Nonessential Noise Sources** The use of radios, personal music devices, or other amplified sound sources at the construction site shall be controlled to ensure that sound is not audible beyond the immediate construction area. The District reserves the right to prohibit such devices at the site, except for communication radios necessary for construction safety and coordination. **4. Equipment Mufflers and Maintenance** All construction equipment, including impact tools, shall be equipped with properly functioning intake and exhaust mufflers. Equipment shall be maintained in good working order to minimize excessive noise, vibration, and rattling. **5. Coordination and Response to Noise Complaints** The Contractor shall cooperate with the District to minimize or temporarily suspend the use of particularly noisy or vibratory equipment if such equipment becomes objectionable due to its duration, intensity, or timing. Reasonable adjustments shall be made to construction sequencing or methods to reduce disruption. **6. Advance Notice of High-Noise Activities** The Contractor shall provide the District with written notice at least 48 hours in advance of particularly noisy construction activities, including but not limited to pneumatic demolition, concrete saw cutting, or other high-impact operations. The

	District may coordinate notifications to staff, students, and nearby residents as appropriate. **7. Construction Equipment and Material Siting** All operating diesel generators shall be located a minimum of 100 feet from any on-site occupied building and from nearby residential property lines, to the extent feasible. Where site constraints prevent full compliance, generators shall be placed at the maximum feasible distance and oriented to direct noise away from occupied buildings and neighboring properties. Construction equipment, staging areas, and construction materials that require the use or movement of powered equipment for loading, unloading, or repositioning shall not be stored or staged within 100 feet of on-site occupied buildings or adjacent property lines, to the extent feasible. Equipment and material storage locations shall be sited to minimize noise exposure to students, staff, and nearby residential receptors.
TRAN-1	**Mitigation Measure TRAN-1: Traffic Engineering Consultation with City of Fresno.** To ensure safe vehicular, bicycle, and pedestrian access following project implementation, the design build entity shall coordinate directly with the City of Fresno Public Works/Traffic Engineering Division during the project design phase to review and refine the proposed parking lot layout, drive approach locations, internal site circulation, and transportation safety features associated with the reconstructed campus. This coordination shall include one or more meetings during the design process and shall result in documented concurrence from the City of Fresno regarding the location and design of access points, circulation patterns, and reasonable on site or off site transportation safety improvements prior to submittal of encroachment permit applications. As a condition of project approval, the project applicant shall identify and implement all reasonable transportation safety improvements required by the City of Fresno to maintain safety and operational efficiency within the public right of way as a result of the project. Required improvements shall be based on applicable City of Fresno standards, adopted policies, and site specific safety considerations, and shall be limited to measures reasonably related to project effects. Such improvements may include, but are not limited to, installation or modification of traffic control signage, pavement striping, marked crosswalks, drive approach improvements, traffic calming features, bicycle or pedestrian facility enhancements, or comparable safety measures. All required transportation safety improvements shall be fully constructed and operational prior to occupancy of the reconstructed school, unless an alternative timing is approved in writing by the City of Fresno.

TC-1	**Mitigation Measure TC-1: Inadvertent Tribal Cultural Resources Discovery.** If tribal cultural resources are inadvertently discovered during ground-disturbing activities associated with the project, the following procedures would be implemented: • **Immediate Work Stoppage** All work within 100 feet of the discovery shall cease immediately. The construction contractor shall notify the project lead agency. • **Notification of Tribal Representatives and Qualified Professional** The lead agency shall immediately notify all California Native American tribe traditionally and culturally affiliated with the Project area and a qualified archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards. • **Evaluation of the Discovery** The qualified archaeologist, in consultation with the lead agency and the notified tribes, shall evaluate the find to determine whether it qualifies as a tribal cultural resource under CEQA Guidelines Section 21074. • **Treatment Plan** If the resource is determined to be a tribal cultural resource, the lead agency, in consultation with the tribes and the qualified archaeologist, shall develop and implement an appropriate treatment plan. The plan shall outline measures for avoidance, preservation in place, or other culturally appropriate treatment consistent with Public Resources Code Section 21083.2 and CEQA Guidelines Section 15126.4. • **Resumption of Work** Work in the area of the discovery shall not resume until the treatment plan has been implemented and the lead agency, in consultation with the tribes, authorizes continuation.

A. Project Background Information

1. Project Title, Lead Agency, and Lead Agency Contact Information

- Project Title: Norseman Elementary School Modernization
- Lead Agency: Fresno Unified School District
- Contact: Alex Belanger
  Chief Executive, Operational Services
  4600 North Brawley Avenue
  Fresno, CA 93722
  Telephone: (559) 457-3074
  Email: William.Belanger@fresnounified.org

2. Project Location

The project is located at the existing Norseman Elementary School campus, located at 4636 E Weldon Avenue, Fresno, California 93703 (APN 447-280-01T and 447-280-18T) and surrounding City of Fresno streets. The project site location and vicinity are shown in Figures 1 and 2.

TABLE 2: PROJECT LOCATION

City	Fresno
County	Fresno
Zip Code	93703
Assessor's Parcel Number	447-280-01T and 447-280-18T
Nearest Existing Major Cross Streets	N Maple Avenue and E University Avenue
Elevation	319
USGS Map	Clovis USGS 7.5-Minute Quad Map
Section, Township & Range	Section 25, Township 13 South, Range 20 East
Latitude/Longitude	36° 46' 5.0232" N, -119° 44' 35.631" W

FIGURE 1: LOCATION MAP

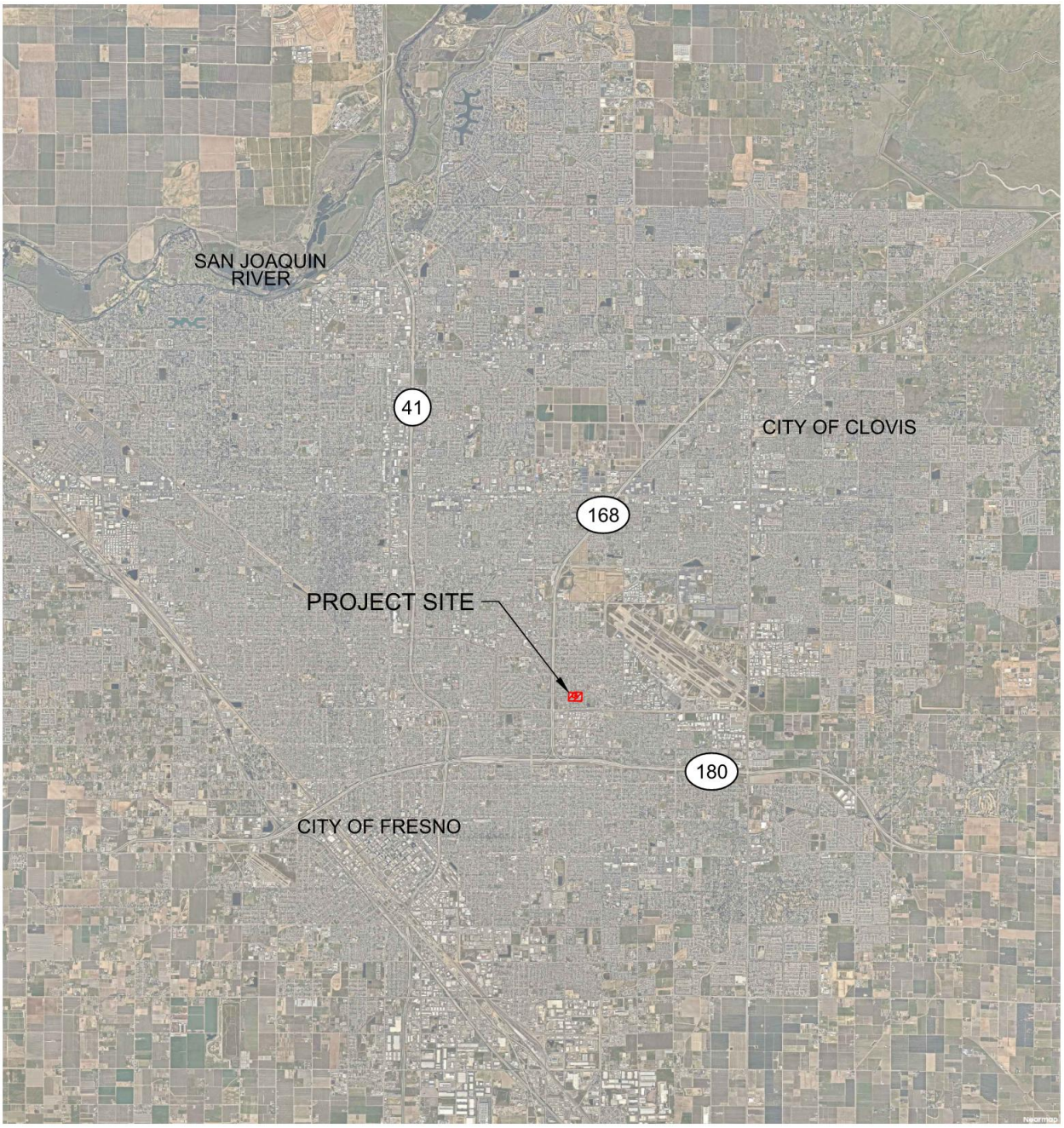


Figure 1: Project Location Map showing an aerial image of the proposed project site in the context of most of the City of Fresno. The project site is shown in central Fresno, east of Highway 168, north of Highway 180, and west of the Fresno Yosemite International Airport.

FIGURE 2: VICINITY MAP

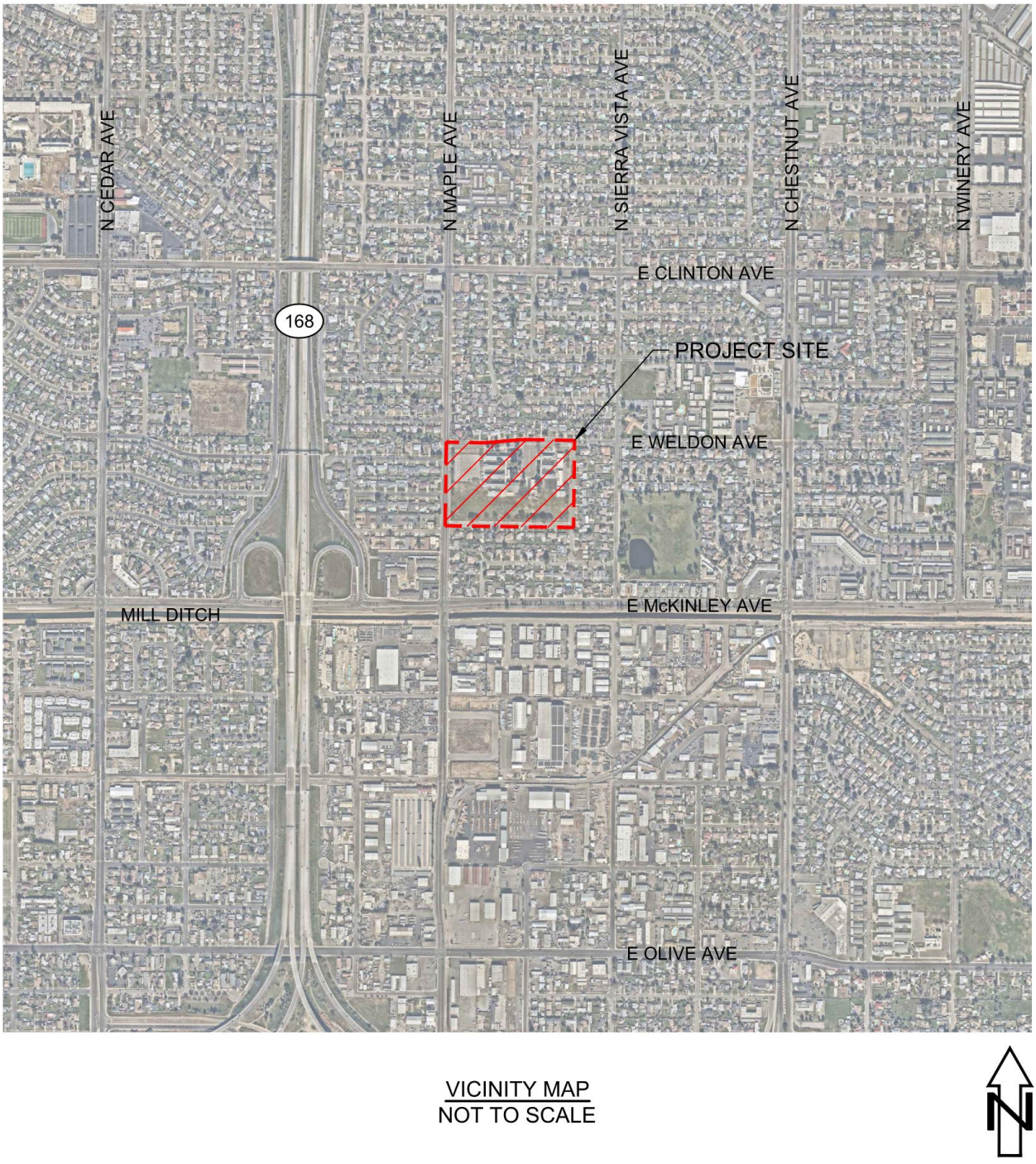


Figure 2: Vicinity Map showing an aerial image of the proposed project site within approximately a 0.75-mile radius around Norseman Elementary School and surrounding land uses. The site is located southeast of the intersection of N. Maple Avenue and E. Weldon Avenue and approximately 1,000 feet east of Hwy 168. Residential land uses surround the school and industrial uses are located further south of the project site.

FIGURE 3: PROJECT SITE

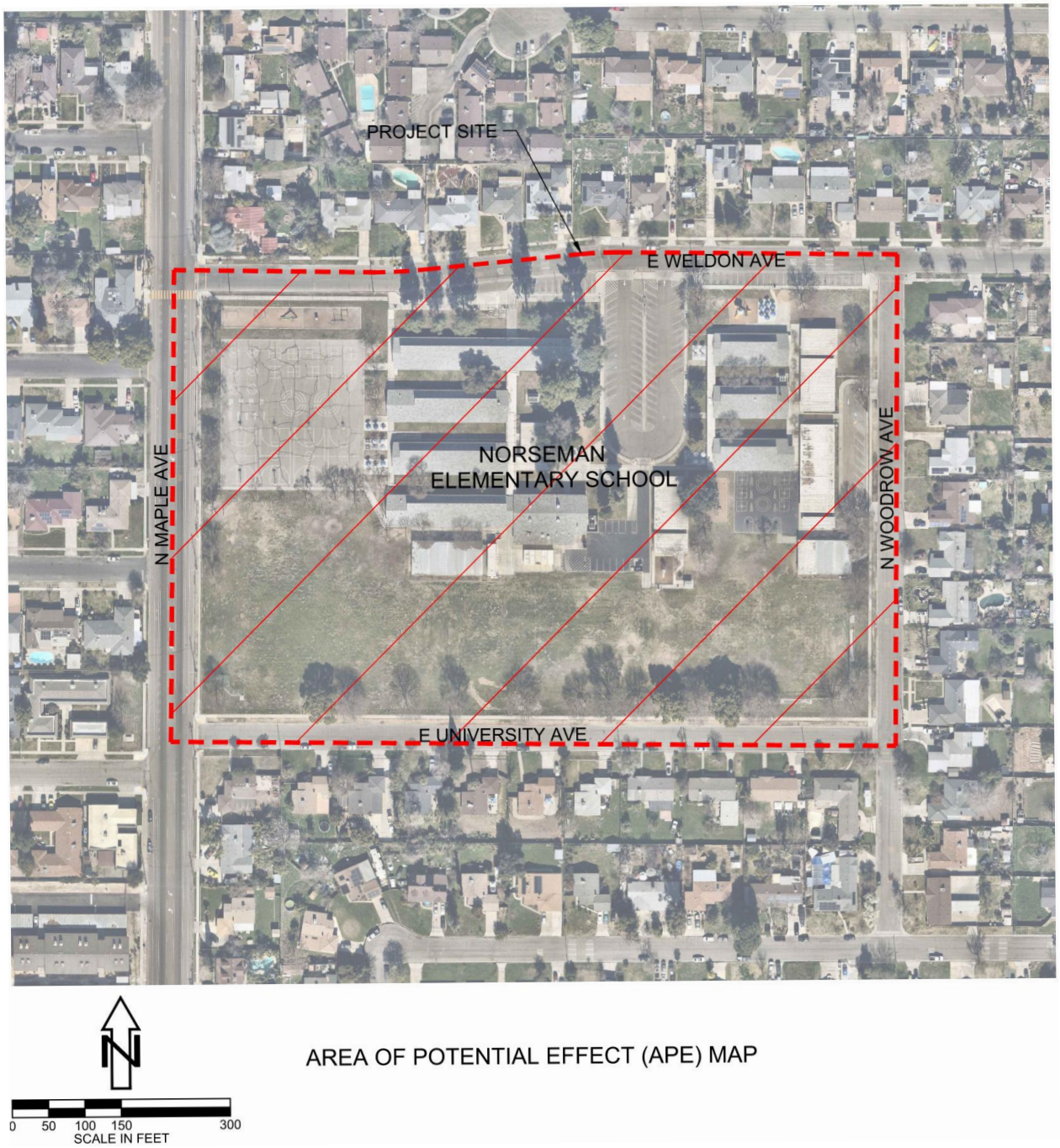


Figure 3: Project Site showing an aerial image of Norseman Elementary School with the project boundary outlined in red. The property is bounded by E. Weldon Avenue to the north, N. Maple Avenue to the west, E. University Avenue to the south, and N. Woodrow Avenue to the east. The image shows school buildings of various sizes, parking lots, play fields, athletic courts, and play structures.

3. Project Description

The Fresno Unified School District (District) proposes to implement the Norseman Elementary School Modernization Project ("project") using Measure H bond funds. The project would modernize the existing Norseman Elementary School campus through demolition, reconstruction, and renovation of existing facilities implemented in two slightly overlapping phases. The project is currently in the conceptual design stage, and specific building layouts, architectural features, and site improvements may be refined during final design. Accordingly, this Initial Study evaluates the maximum reasonably foreseeable scope and intensity of development that could occur under the conceptual plan to ensure that any environmental effects are fully disclosed, even if minor design modifications occur.

At maximum buildout, the project would replace aging and outdated campus facilities with modern instructional, administrative, and support spaces designed to meet current educational, building code, accessibility, and Division of the State Architect (DSA) standards. The project is intended to modernize facilities serving the existing student population and would not increase student enrollment or campus capacity. The project site is approximately 15.2 acres and includes all of 12.4-acre Norseman Elementary School and approximately 2.8 acres of surrounding City of Fresno streets of Weldon Avenue, Woodrow Avenue, University Avenue, and Maple Avenue. The project site can be seen in Figure 3.

Project Objectives and Campus Improvements

In general, the project would modernize the campus by removing portable classrooms and permanent buildings that have exceeded their useful life and constructing new permanent facilities. Proposed improvements, as represented conceptually, would include new classroom buildings, an early learning building, and administrative facilities, modernization of two buildings, upgraded outdoor instructional and play areas, and reconfigured on-site parking and drop-off areas to enhance campus functionality and safety.

As a result of proposed changes to campus access points, parking configuration, and internal circulation, the project may also require off-site traffic safety-related improvements within the public right-of-way, as determined through City of Fresno and/or County of Fresno review and applicable safety or traffic standards. Such improvements, if required, could include modifications such as enhanced signage, pavement striping, crosswalk improvements, traffic calming features, bicycle or pedestrian facility enhancements, or similar safety measures. The specific nature, location, and extent of any off-site improvements have not yet been determined and would be finalized during subsequent design development and discretionary review.

Under the conceptual design evaluated in this Initial Study, new buildings and a staff parking lot would generally be located in the southeastern portion of the campus, while student/parent parking and vehicle circulation improvements would be concentrated in the northeastern portion. Two existing buildings in the center-north of the campus, Buildings E and J, would be modernized. While the final configuration may vary, development would remain within the existing campus boundaries and would not exceed the square footage or operational characteristics evaluated in this Initial Study.

Construction Phasing

Construction would occur in multiple phases to allow the school to remain operational throughout implementation. Construction is anticipated to begin in approximately June 2028 and conclude by approximately

August 2029. While the exact sequencing and timing may be adjusted during final design and contractor selection, the project would generally occur as follows:

Phase 1A: Southeast Campus Demolition

Phase 1A would involve demolition of Portable Buildings P1 through P4 and P12 through P16, along with removal of two play structures, a blacktop area, and an athletic field located in the southeastern portion of the campus. This phase would include demolition of approximately 10,350 square feet of classroom space and site clearing of approximately 3.2 acres of concrete, asphalt, and turf grass. Demolition is anticipated to occur between June 2028 and August 2028 (during summer break).

Phase 1B: Southeast Campus Reconstruction

Phase 1B would include construction of an administration building, an early learning building, and a classroom building within the previously demolished area. Outdoor improvements would include a blacktop play court, play structures, a playfield, and a parking lot along University Avenue with up to approximately 59 parking spaces. Construction is anticipated to occur between approximately June 2028 and August 2029.

Phase 2A: Northeast Campus Demolition

Phase 2A would demolish Classroom Buildings I, G, and H; Portable Buildings P5 through P11; the existing north parking lot and street-side parking along Weldon Avenue; the east parking lot along Woodrow Avenue; selected landscaped areas; and a play structure in the northeastern portion of the campus. This phase would include demolition of approximately 17,500 square feet of building space and site clearing of approximately 2.06 acres of asphalt, concrete, and landscaping. Demolition is anticipated to occur between approximately June 2029 and August 2029.

Phase 2B: Northeast Campus Reconstruction and Existing Building Remodel

Phase 2B would include construction of an approximately 2.5-acre parking lot with up to approximately 116 parking spaces and a student drop-off loop with an entrance on Weldon Avenue and an exit on Woodrow Avenue. During this phase, existing Classroom Building J (2,970 square feet) would be remodeled internally and converted to a library, while Building E (1,600 square feet) would be remodeled and converted to a social emotional learning (SEL) classroom. Existing Buildings A, B, C, D, and F and Portable Buildings P17 through P20 would receive fire and security alarm upgrades. Construction of this phase is anticipated to occur between approximately June 2029 and August 2029.

Building Area and Design Parameters

The existing campus contains approximately 64,750 gross square feet (GSF) of building space. The project would demolish up to approximately 27,850 GSF and construct up to approximately 28,500 GSF of new facilities, resulting in a modernized campus totaling approximately 64,100 GSF. Approximately 4,570 GSF of existing buildings would be remodeled. Parking spaces would increase from 116 existing parking stalls to approximately 175 proposed parking spaces. Final square footage and parking may vary slightly; however, the project would remain within this maximum development envelope and would not result in additional student capacity.

All new and remodeled facilities would be designed and constructed in compliance with the applicable California Building Standards Code in effect at the time of permitting, DSA requirements, and state mandates for energy efficiency, on-site solar photovoltaic panels and battery storage, electric vehicle charger parking stalls, water efficiency, seismic safety, fire protection, indoor environmental quality, and drought-tolerant landscaping.

Utilities and Infrastructure

Water and sanitary sewer services would be provided by the City of Fresno. Stormwater drainage would be managed through on-site collection systems and conveyed to off-site facilities operated by the Fresno Metropolitan Flood Control District (FMFCD). Electrical service would be provided by Pacific Gas and Electric Company (PG&E). Minor modifications or extensions to existing utility infrastructure may occur as part of final design but would remain within the development parameters evaluated in this Initial Study.

FIGURE 4: EXISTING PROJECT SITE MAP



Figure 4: Existing Project Site Diagram showing Norseman Elementary School campus layout. The east portion includes three permanent buildings (H, J, and K) and 16 portable buildings (P1–P16), with surrounding concrete areas, play structures, landscaping, and a parking lot along N. Woodrow Avenue and E. Weldon Avenue, and parking stalls off of E. Weldon Avenue. The west campus has seven permanent buildings (A through G), four portable buildings (P17–P20), parking stalls and a bus drop-off lane along E. Weldon Avenue, and asphalt play courts and play structures along the west perimeter.

FIGURE 5: PROPOSED CONCEPTUAL PHASE 1A DEMOLITION SITE MAP



Figure 5: Proposed Conceptual Phase 1A Demolition Site Map shows a diagram of the existing campus, but with the southeast quarter of the site marked for demolition and an access road to the west blacktop. Demolition includes Portables P1 through P4 and portables P12 through P16, the central site parking lot, a portion of the east parking lot, two play structures, and a playfield. Existing Buildings A, B, C, D, F, and Portable Buildings P17 through P20 are marked for fire and security alarm upgrades.

FIGURE 6: PROPOSED CONCEPTUAL PHASE 1B SITE MAP



Figure 6: Proposed Conceptual Phase 1B Proposed Site Map showing Norseman Elementary School campus with a construction area and proposed new facilities shown in the southeast quarter of the site. New facilities include an administration building, early learning building, classroom building, a parking lot with an access road connecting to the existing west blacktop, a new blacktop, three play structures, and a playfield.

FIGURE 7: PROPOSED CONCEPTUAL PHASE 2A DEMOLITION SITE MAP



Figure 7: Proposed Conceptual Phase 2A Demolition Site Map showing Norseman Elementary School campus with Phase 1B improvements completed in the southeast quarter, and the northeast quarter marked for demolition. Demolition includes Buildings I, G, and H, Portable Buildings P5 through P11, the north parking lot, the remainder of the east parking lot, and roadside parking along Weldon Avenue.

FIGURE 8: PROPOSED CONCEPTUAL PHASE 2B SITE MAP

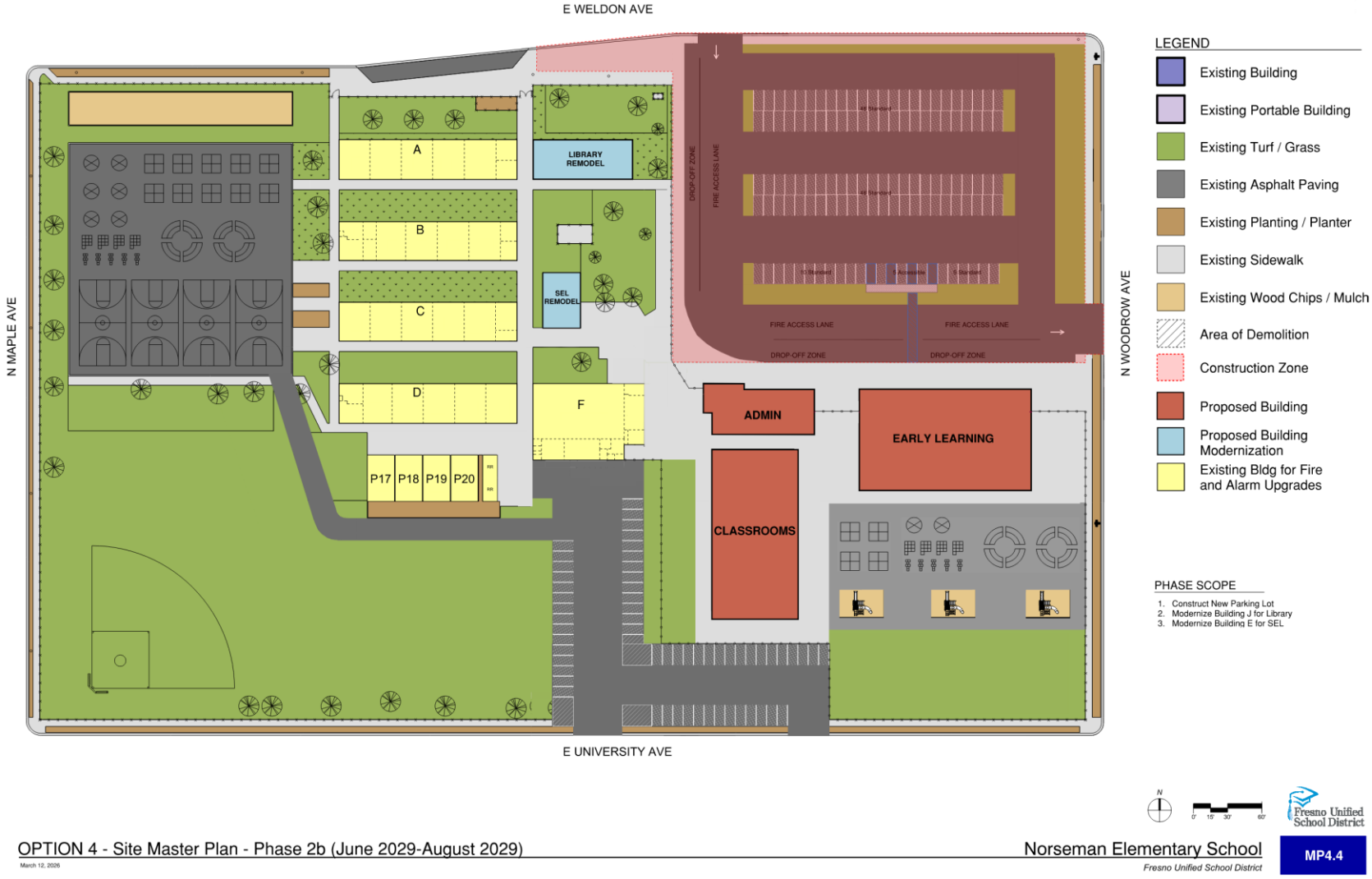


Figure 8: Proposed Phase 2B Site Map showing Norseman Elementary School campus with the northeast quarter of the site marked as a construction area and showing improved with a parking lot and a drop-off loop with an entrance on Weldon Avenue and an exit on Woodrow Avenue. Existing Building J is marked for remodel to convert to a library and Building E is marked for remodel.

FIGURE 9: PROPOSED CONCEPTUAL FINAL SITE MAP



Figure 9: Proposed Conceptual Final Site Map showing the completed site with improvements from all phases. The figures shows the new administration, classroom, and early learning buildings in the southeast with a new play area and south parking lot, a new parking lot and drop-off loop in the northeast, two remodeled buildings in the center-north of the campus, fire and security upgrades to existing Buildings A, B, C, D, and F, and Portable Buildings P17 through P20. The west side of the campus remains unchanged from the existing campus.

4. Project Design Standards

State of California

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

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

Together, these components of Title 24 ensure that the reconstructed school integrates current statewide standards for safety, sustainability, accessibility, and energy efficiency, as enforced through the DSA review and approval process.

City of Fresno

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

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

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

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

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

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

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

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

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

Fresno Metropolitan Flood Control District (FMFCD)

FMFCD would review proposed site development plans to ensure they meet the Master Drainage Plan and stormwater design standards. FMFCD would start by checking that all required documents are submitted, then conduct a technical review to confirm drainage capacity, proper integration with existing infrastructure, and compliance with NPDES water quality requirements. FMFCD would coordinate with local agencies, set conditions such as drainage fees or facility agreements, and grant approval once all requirements are satisfied. After construction, FMFCD will enforce post-development mitigation agreements.

5. Actions Required to Implement the Project

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

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

6. Project Schedule

The four construction phases of the project are estimated to occur according to the following schedule:

- **Phase 1A:** Southeast Campus Demolition, June 2028 to August 2028
- **Phase 1B:** Southeast Campus Reconstruction, June 2028 to August 2029;
- **Phase 2A:** Northeast Campus Demolition, June 2029 to August 2029;
- **Phase 2B**: Northeast Campus Reconstruction and Renovation, June 2029 to August 2029.

7. Project Setting

a) Existing Land Uses

The project site is an existing elementary school campus - Norseman Elementary School.

b) Public Land Use Policies

The project is located in the City of Fresno. The City of Fresno's land use policies include the City of Fresno General Plan and its zoning ordinance, Chapter 15 – Citywide Development Code, Including Revisions of the Fresno Municipal Code.

c) Zoning

The project site's parcels are currently zoned as Public and Institutional (PI).

d) Streets and Highways

The project is bordered by E. Weldon Ave. to the north, E. University Ave. to the south, N. Woodrow Ave. to the east, and N. Maple Ave. to the west. The nearest highway is Highway 168 which is approximately 1,000 ft. to the west. Highway 180 is 0.85 miles to the south.

e) Public Utilities and Services

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

f) Climate

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

g) Police and Fire

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

h) Transit

The project area is served by the Fresno Area Express (FAX). The nearest bus stop is approximately 0.25 miles north of the project site on E. Clinton Avenue.

8. Preliminary Consultation with City of Fresno

On November 4, 2025, District representatives attended a Development Review Committee meeting with the City of Fresno to hear preliminary comments on the proposed project. District representatives heard comments from City of Fresno Planning, Fire, Public Utilities, and Engineering Departments on various City codes, regulations, and policies for the proposed Project. All comments were noted and would be considered during the design development process of the project.

9. Other Public Agencies Whose Approval is Required

Implementation of the project would require approvals from the following public agencies in addition to the District:

TABLE 3: RESPONSIBLE PUBLIC AGENCIES

Public Agencies	Approval(s)
San Joaquin Valley Air Pollution Control District	Compliance with applicable rules and regulations, including but not limited to Regulation VIII (Dust Control Plan) and Rule 9510 (Indirect Source Review).
Division of State Architect	Review and approve the design of school facilities.
City of Fresno	Encroachment Permits for right-of-way improvements. Public utility connection/modification permits.
County of Fresno	Encroachment Permits for right-of-way improvements. Public utility connection/modification permits on west side of Maple Avenue, in County jurisdiction.

10. Consultation with California Native American Tribes

In accordance with Public Resources Code Section 21080.3.1 (Assembly Bill 52, 2013–2014), the lead agency is required to notify, in writing, any California Native American Tribe that has previously requested notification of projects within the geographic area of a proposed project. This notification must be provided within 14 days of the agency's decision to undertake a project subject to CEQA. The notification includes a brief description of the project and invites the Tribe to indicate whether it wishes to initiate formal consultation.

If the Tribe elects to consult, the lead agency must begin the consultation process within 30 days of receiving the request. The consultation continues until either: (1) the parties agree on mitigation measures, (2) the parties agree that mitigation is not necessary, or (3) either party concludes that a mutual agreement cannot be reached despite a good faith effort.

On November 14, 2025, the District notified all California Native American tribe traditionally and culturally affiliated with the Project area with a summary of the proposed project via certified mail. By December 14, 2025, no responses were received from any tribes. A compilation of the *Sacred Lands Files* search results, tribal notification letters, and a correspondence tracking sheet are included in Appendix E.

B. Environmental Factors Potentially Affected

Based on the evaluations in Part E, the project would have a less than significant impact on the environmental factors listed in the following table. Those factors that require mitigation to be incorporated into the project to be less than significant are noted with an "X".

TABLE 4: ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

C. Determination

Based on this Initial Study, I find that the _____ Project could have significant effects on the environment, but mitigation measures incorporated in the project by the _____ will avoid the effects or render them less than significant. Therefore, a Mitigated Negative Declaration is recommended for adoption.

_____

Signature Date

_____

Print Name Title

D. Evaluation of Environmental Impacts

1. State CEQA Guidelines Appendix G Environmental Checklist

This Initial Study identifies and analyzes the potential impacts of the project on the environmental resources and conditions listed in Appendix G in the State CEQA Guidelines and describes feasible mitigation measures that could be incorporated into the project to avoid the impacts or reduce them to an insignificant level and determines the significance of the impact with or without mitigation. The environmental resources and conditions listed in Appendix G are categorized as follows: Aesthetics, Agricultural and Forestry Resources, Air Quality, Biological Resources, Cultural Resources, Energy, Geology and Soils, Greenhouse Gas Emissions, Hazards, and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Mineral Resources, Noise, Population and Housing, Public Services, Recreation, Transportation, Tribal Cultural Resources, Utilities, and Service Systems, Wildfire, and Mandatory Findings of Significance.

The discussion of each impact in Part E of this Initial Study concludes with a determination that the impact is potentially significant, less than significant with mitigation, less than significant, or does not involve any impact (no impact).

The "potentially significant" determination is applied if there is substantial evidence that an effect may be significant. Under the State CEQA Guidelines, a significant effect, or impact, on the environment means a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance (see Guidelines Section 15382). The District must prepare an Environmental Impact Report for the project if the Initial Study identifies one or more potentially significant impacts.

The "less than significant impact with mitigation incorporated" determination applies when the incorporation by the District of mitigation measures in the project would reduce an impact from potentially significant to less than significant. This Initial Study describes each mitigation measure the District has incorporated into the project to reduce potentially significant impacts to a less-than-significant level.

The "less than significant" determination applies when the project would not result in a significant effect on a resource or condition. The less-than-significant determination is used only in cases where no mitigation measures are required to reduce the impact to a less-than-significant level.

The "no impact" determination applies when the project would have no impact on a resource or condition, or the resource or condition does not apply to the project or its location.

The discussion of impacts in this Initial Study lists each potential impact as stated in Appendix G, provides an analysis of the impact, describes each mitigation measure required to avoid the impact or reduce it to an insignificant level, and concludes with a determination of the level of significance of the impact. References to documents that would provide background information on an impact are provided where applicable.

This Initial Study incorporates by reference all documents and other sources of information cited in the Evaluation of Environmental Impacts (Part E) and Sources Consulted (Part H).

2. Existing Laws, Regulations, Policies, and Mitigation Measures

In some cases, an impact that might appear to be significant is less than significant because it is subject to state, regional, or local laws, regulations, or policies – the application of which will reduce the impact to a less than significant level. The preparation of this Initial Study included a review of applicable laws, regulations, and policies to determine if they would prevent or reduce the potentially significant impacts of the project. The Initial Study does not cite the laws, regulations, and policies as mitigation measures because they would apply to the project regardless of the outcome of the Initial Study. For the project, applicable laws, regulations, and policies include but are not limited to the following:

State of California: The state requirements include, but are not limited to the following:

- **Education Code Section 17213, Public Resources Code Section 21151.8; and California Code of Regulations, Title 5, Section 14011[h],[i]; Title 14, Section 15093**:

  Requires the District Board to adopt findings stating: (1) the proposed school site is not a current or former waste disposal site; (2) the site is not a hazardous substance release site; (3) the site does not contain pipelines; and (4) whether a qualified freeway and/or qualified traffic corridor is located within 500 feet of the site. In addition, it requires board-adopted findings for hazardous air emitters and hazardous material handlers located within a 1/4 mile of the site.

- **Education Code Section 17215 and California Code of Regulations, Title 21, Division 2.5, Chapter 2.1: Airports:**
  Requires providing notice to the State Department of Education if a proposed school site is within two nautical miles, measured by air line, of that point on an airport runway or a potential runway is included in the airport master plan that is nearest to the site. The Department of Education is required to consult with the Department of Transportation as to the safety of the site concerning airport operations.

- **Title 5, California Code of Regulations, Article 2, Section 14010, Standards for School Site Selection:**

  The standards address: possible hazards related to power line easements, railroads, airports, major streets, above-ground pipelines, underground pipelines, above-ground storage tanks, traffic, noise, seismicity, geology, soils, flooding, dam flood inundation, incompatible zoning, and other safety-related factors.

- **Title 24, California Code of Regulations, Part 1 through Part 12:**
  Specifies the State of California building regulations for public schools. The Division of the State Architect is responsible for administering the regulations.

State Water Resources Control Board
The National Pollutant Discharge Elimination System Program (NPDES) program pursuant to the federal Clean Water Act and the State Water Resources Control Board's Construction General Permit (Order No. 2022-0057-DWQ).

San Joaquin Valley Air Pollution Control District

Regulation VIII – Fugitive PM10 Prohibitions, Regulation IX – Mobile and Indirect Sources, Rule 9510 – Indirect Source Review (https://www.valleyair.org/rules/1ruleslist.htm).

City of Fresno

- City of Fresno General Plan
- City of Fresno Development Code
- City of Fresno Municipal Code
- City of Fresno Active Transportation Plan
- City of Fresno Vision Zero Action Plan
- City of Fresno Bicycle and Pedestrian Facility Design Guidelines
- City of Fresno Traffic Engineering Design Standards
- City of Fresno Standard Specifications and Standard Drawings
- City of Fresno Urban Water Management Plan
- City of Fresno Water System Master Plan
- City of Fresno Sewer Master Plan
- City of Fresno Storm Drainage Master Plan
- Fresno Yosemite International Airport Land Use Compatibility Plan

E. Environmental Checklist

The questions in Sections E, 1-20 are taken from the State CEQA Guidelines, Appendix G: Environmental Checklist Form, Evaluation of Environmental Impacts. The thresholds of significance used for this Initial Study are the same as the environmental issues listed in the Appendix G Checklist.

1. Aesthetics

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

Environmental Setting

The project site is the existing Norseman Elementary School campus in Fresno, Fresno County, CA. The project location is flat with no direct views to any natural areas, except for the Sierra Nevada Mountains to the east, and the Coast Ranges Mountains to a lesser extent to the west, are also visible on clear days. The land around the project site consists of residential homes. Views from around the site include the residences and the public roads.

Scenic Routes and Vistas

According to the California Department of Transportation, the closest eligible or officially designated scenic highway is State Route 168 starting at the Shaw Ave. intersection, which is 2.75 miles north (California Department of Transportation, 2025). The Fresno County General Plan Review (County of Fresno, 2024) and the Fresno County General Plan Background Report (County of Fresno, 2000) did not identify or designate any scenic vistas within or near the project area.

City of Fresno Light Trespass Requirements

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

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

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

Less than Significant Impact

The project site is not in a viewshed of a scenic vista or near any eligible or officially designated scenic highways. The project would reconstruct buildings in locations that currently do not have buildings. New building may obstruct the view to the mountains to the east and west, though the mountains are not readily visible to the residences on the east and west side of the campus due to trees obstructing the view, and the distance to the mountains. The project would have a **less than significant impact.**

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

Less than Significant Impact

The project site is not located within a state scenic highway, nor would the project involve modifications to a state scenic highway. The project would not impact any historic buildings. The District would preserve any scenic trees as feasible and replace any removed trees as a part of the project landscaping plans. The project would have a **less than significant impact.**

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

No Impact

The project is located in a fully urbanized area. The project's land use would not change from its current land use. Additionally, the redevelopment would not conflict with applicable zoning or other regulations governing scenic quality (City of Fresno, 2025). The project would have **no impact.**

d. Create a new source of light and glare that would adversely affect day or nighttime views in the area?

Less than Significant Impact

The Project would reconstruct existing light sources on the campus and install new street lighting in accordance with City of Fresno standards. All on-campus lighting would be directed toward interior campus areas to minimize spillover. Fixtures would include shielding and cutoff features to prevent light trespass onto adjacent residential properties to the east. Nighttime lighting would be limited to essential security illumination around buildings and storage areas, consistent with standard best practices for outdoor lighting. With these design aspects in place, the Project would not create substantial light or glare and would result in a **less than significant impact.**

2. Agriculture and Forestry Resources

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non- agricultural use?				X
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?				X
c. Conflict with existing zoning for, or cause rezoning of, forestland, timberland, or timberland zoned Timberland Production?				X
d. Result in the loss of forestland or conversion of forestland to non-forest use?				X
e. Involve other changes in the existing environment which, due to their location or nature, could result in the conversion of Farmland, to non-agricultural use or conversion of forestland to non-forest use?				X

Environmental Setting

Farmland Mapping and Monitoring Program (FMMP): The FMMP produces maps and statistical data used for rating California's agricultural land resources. Agricultural land is rated according to soil quality and irrigation status, where the best quality land is designated as Prime Farmland. Maps are updated every two years using computer mapping, aerial imagery, public review, and field investigations. The California Department of Conservation's (DOC) 2020 FMMP is a non-regulated program that creates "Important Farmland" maps and statistical data for analyzing California's agricultural resources in eight land use categories. According to maps prepared by the California Department of Conservation, the project site is located on Urban and Built Up Land (CA Dept. of Conservation, 2022).

Would the project:

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

No Impact

The project is not located on Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. The project would have **no impact.**

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

No Impact

The project site is not zoned for agricultural use, nor does it have any agricultural uses onsite. The site is not enrolled in a Williamson Act contract. The project would have **no impact.**

c. Conflict with existing zoning for, or cause rezoning of, forestland, timberland, or timberland zoned timberland production?

No Impact

The project site is zoned as Public and Institutional (PI). The project would not conflict with zoning, or cause rezoning of, forestland, timberland, or timberland zoned timberland production as the project site is located in a highly urbanized area, and its land use would not change. The project would have **no impact.**

d. Result in the loss of forestland or conversion of forestland to non-forest use?

No Impact

There is no forest or forestland at the project site. The project would not result in the loss of forestland or conversion of forestland to non-forest use. The project would have **no impact.**

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

No Impact

The project site's land use would remain the same and would not result in changes to existing environment that could result in conversion of any farmland to non-agricultural uses, or forestland to non-forest use. The project would have **no impact.**

3. Air Quality

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Conflict with or obstruct implementation of the applicable air quality plan?			X	
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality?			X	
c. Expose sensitive receptors to substantial pollutant concentrations?			X	
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?			X	

An Air Quality & Greenhouse Gas Impact Analysis report was prepared for this project by Blair, Church & Flynn and is included as Appendix A to this Initial Study. This Initial Study incorporates information and analysis from this report to evaluate impacts on air quality.

Regulatory Setting

Local Air Quality Plans

The SJVAPCD is tasked with implementing programs and regulations required by the Federal Clean Air Act (FCAA) and the California Clean Air Act (CCAA). In that capacity, the SJVAPCD has prepared plans to attain Federal and State ambient air quality standards. According to the CEQA Guidelines, the significance criterion established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. The project is within the jurisdiction of the San Joaquin Valley Air Pollution Control District (SJVAPCD The SJVAPCD guides air quality analysis under CEQA in its *Guidance for Assessing and Mitigating Air Quality Impacts* (GAMAQI) (San Joaquin Valley Air Pollution Control District, 2015).

The GAMAQI guidance document includes recommended thresholds of significance to be used for the evaluation of short-term construction, long-term operational, odor, toxic air contaminant, and cumulative air quality impacts. Accordingly, the SJVAPCD-recommended thresholds of significance are used to determine whether implementation of the proposed project would result in a significant air quality impact. The thresholds of significance are summarized below.

- Short-term Emissions—Construction impacts associated with the proposed project would be considered significant if project-generated emissions exceeded 100 tons per year (TPY) of CO, 10 TPY of ROG or NOx, 27 TPY of SOx, or 15 TPY of PM_{10} or $PM_{2.5}$.
- Long-term Emissions—Operational impacts associated with the proposed project would be considered significant if project-generated emissions would exceed 100 TPY of CO, 10 TPY of ROG or NOx, 27 TPY of SOx, or 15 TPY of PM_{10} or $PM_{2.5}$.

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

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

Thus, projects with emissions below the thresholds of significance for criteria pollutants would be determined not to conflict with or obstruct the implementation of the SJVAPCD air quality plans.

Would the project:

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

Less than Significant Impact

In accordance with SJVAPCD-recommended methodology for the assessment of air quality impacts, projects that result in significant air quality impacts at the project level are also considered to have a significant cumulative air quality impact. As noted in the following impact analysis and in Appendix A *Air Quality & Greenhouse Gas Impact Analysis*, short-term construction and long-term operational emissions would not exceed applicable thresholds. The project would not increase student capacity or enrollment, therefore would not increase vehicles miles traveled (VMT) for the project site.

Additionally, the Project would comply with applicable SJVAPCD Rules and Regulations. The following SJVAPCD requirements apply to the project:

- SJVAPCD Regulation VIII (Fugitive Dust Control) – The project would be required to implement measures to mitigate fugitive dust from construction activities.
- SJVAPCD Rule 9510 (Indirect Source Review or "ISR") – projects that are above the applicability size thresholds must prepare and submit to SJVAPCD an Air Impact Assessment (AIA) application. SJVAPCD would complete an assessment of project emissions for NOx and PM_{10} and require air quality mitigation fees or measures if project emissions are determined to be over the threshold of 2.0 TPY.

For these reasons, the project's impact would be **less than significant.**

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

Less than Significant Impact

The proposed project is in Fresno, California, in Fresno County, which is within the San Joaquin Valley Air Basin (SJVAB), which is designated as nonattainment for 1-hour ozone, 8-hour ozone, PM_{10}, and $PM_{2.5}$. The SJVAB attainment status for criteria air pollutants is displayed below in Table 5.

TABLE 5.
SJVAB ATTAINMENT STATUS DESIGNATION

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

Potential air quality impacts associated with the proposed project could occur during construction or operation. Short-term construction and long-term air-quality impacts associated with the proposed project are discussed as follows:

Short-Term Construction Emissions

The project would result in a short-term increase in air pollutant emissions. Construction-generated emissions are temporary, occurring only during construction activities, but have the potential to result in a significant air quality impact. The construction of the project would result in temporary generation of emissions caused by off-road and on-road construction equipment exhaust, as well as emissions released from earth moving (fugitive dust), asphalt concrete paving, and painting (VOCs). Estimated construction-generated annual emissions, per phase, associated with the proposed project are summarized in Table 5 in Appendix A. Construction of the proposed project would generate maximum uncontrolled annual construction emissions of approximately 0.19 TPY of ROG, 0.79 TPY of NOx, 1.04 TPY of CO, <0.005 TPY of SO_2, 0.07 TPY of $PM_{10}T$, and 0.04 TPY of $PM_{2.5}T$. These emissions would remain below the SJVAPCD's annual significance thresholds of 10 TPY for ROG and NOx, 100 TPY for CO, 27 TPY for SO_2, and 15 TPY for $PM_{10}T$ and $PM_{2.5}T$.

Estimated average daily on-site construction emissions are summarized in Table 6 in Appendix A. Construction of the proposed project would generate maximum on-site emissions of approximately 13.35

lbs/day of ROG, 12.17 lbs/day of NOx, 14.46 lbs/day of CO, 0.03 lbs/day of SO_2, 7.62 lbs/day of PM_{10}, and 3.90 lbs/day of $PM_{2.5}$. Daily on-site construction emissions would not exceed the SJVAPCD's recommended localized ambient air quality significance thresholds of 100 lbs/day for any of the criteria pollutants. Additionally, project construction would be required to comply with applicable CARB and SJVAPCD rules and regulations. This would further reduce construction-related emissions. For these reasons, the impact of construction-generated emissions would be considered **less than significant.**

Long Term Operational Emissions

Estimated annual operational emissions for the proposed project are summarized in Table 7 in Appendix A. Upon completion of the project, the project is expected to generate approximately 0.14 TPY of ROG, 0.06 TPY of NOx, 0.16 TPY of CO, and <0.005 TPY of SO_2, <0.005 TPY of PM_{10}, and <0.005 TPY of $PM_{2.5}$T. These emissions would primarily result from mobile sources, building operations (including energy use), and area sources such as occasional use of cleaning products, architectural coatings, and maintenance activities. Operational emissions from the project in 2029 would remain below SJVAPCD's emissions significance thresholds.

Table 8 summarizes the estimated increase in maximum daily on-site operational emissions compared to the existing project site operation. As mentioned, maximum daily emissions would primarily stem from area sources, such as landscape maintenance activities and the use of consumer products. Upon completion of the project, maximum daily on-site emissions are estimated at 0.89 lbs/day of ROG, 0.36 lbs/day of NOx, 1.53 lbs/day of CO, <0.005 lbs/day of SO_2, 0.03 lbs/day of PM_{10}, and 0.03 lbs/day of $PM_{2.5}$T.

Even at maximum levels, daily on-site emissions would remain below the SJVAPCD's localized ambient air quality significance threshold of 100 lbs/day for all criteria pollutants. The long-term operation of the proposed project would not result in a significant impact on regional or local air quality conditions. Additionally, project operation would be required to comply with the 2025 Building Energy Efficiency Standards, which include the requirement to install onsite solar photovoltaic systems and an energy storage system (ESS) and EV charger equipped parking stalls. This would further reduce operational-related emissions. For these reasons, the project's impact would be **less than significant.**

c. Expose sensitive receptors to substantial pollutant concentrations?

Less than Significant Impact with Mitigation

According to the SJVAPCD GAMAQI (San Joaquin Valley Air Pollution Control District, 2015), the determination of whether project emissions would expose sensitive receptors to substantial pollutant concentrations is a function of assessing potential health risks. Sensitive receptors are facilities that house or attract children, the elderly, people with illnesses, or others who are especially sensitive to the effects of air pollutants. Hospitals, schools, convalescent facilities, and residential areas are examples of sensitive receptors. When evaluating whether a development proposal has the potential to result in localized impacts, Lead Agency staff need to consider the nature of the air pollutant emissions, the proximity between the emitting facility and sensitive receptors, the direction of prevailing winds, and local topography.

The project site itself includes the Norseman Elementary School, which is a sensitive receptor. Additionally, residential properties to the east and west, a church to the north, and a medical office to the south are other sensitive receptors near the project site. Long-term operational and short-term

construction activities and emission sources that could adversely impact these sensitive receptors are discussed as follows:

Long-Term Operation

Toxic Air Contaminants

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

Carbon Monoxide

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

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

Short-Term Construction

Naturally Occurring Asbestos

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

Asbestos-Containing Materials

Demolition and renovation activities can adversely affect air quality where asbestos-containing materials (ACM) are present and disturbed. ACM is commonly found in buildings constructed prior to 1970 and may occur in building components such as floor tile, roofing materials, insulation, and piping systems. Disturbance of ACM during demolition, renovation, or maintenance activities can release airborne asbestos fibers, which pose health risks to construction workers and nearby sensitive receptors if not properly controlled.

A building assessment prepared by Forensic Analytical Consultants identified the presence of asbestos-containing materials in structures proposed for demolition and renovation (FACS, 2026). In the absence of proper controls, disturbance of these materials could result in adverse air quality

impacts. However, activities involving ACM are subject to comprehensive federal, State, and local regulations that are specifically designed to minimize emissions and protect human health.

Applicable regulations include the National Emission Standards for Hazardous Air Pollutants (NESHAP) for asbestos (40 CFR Part 61, Subpart M), as well as San Joaquin Valley Air Pollution Control District (SJVAPCD) Rule 4002, which implements and enforces these requirements at the regional level. These regulations require, among other things: (1) a thorough asbestos survey conducted by a Certified Asbestos Consultant, (2) notification to the SJVAPCD at least 10 working days prior to demolition or renovation activities involving regulated asbestos-containing material (RACM), and (3) proper removal, handling, containment, and disposal of ACM to prevent the release of asbestos fibers (San Joaquin Valley Air Pollution Control District, 2007).

For structures proposed for demolition, all regulated ACM would be removed through regulated abatement procedures by Cal/OSHA-certified asbestos abatement contractors prior to demolition activities. For buildings proposed for renovation, ACM would either be removed (abatement) where disturbance would occur, or managed in place through encapsulation or enclosure where appropriate. Encapsulation involves sealing ACM with a protective coating to prevent fiber release, while enclosure isolates the material behind a permanent barrier. These methods are recognized approaches for managing ACM when removal is not required.

All asbestos-related activities would be conducted in compliance with applicable regulatory requirements, including proper work practices, air monitoring (as required), and waste handling. Asbestos-containing waste would be transported and disposed of at approved facilities in accordance with applicable hazardous materials regulations. Required notifications would be submitted, and all work would be performed by trained and certified personnel.

Because the project would comply with all applicable federal, State, and local regulations governing the identification, handling, and disposal of asbestos-containing materials, and because these regulations are designed to avoid significant emissions and exposure risks, impacts related to demolition and renovation of structures containing asbestos would be **less than significant.**

Lead-Coated Materials

Demolition and renovation activities involving structures coated with lead-based paint (LBP) can adversely affect air quality and pose health risks if not properly managed. Lead-based paint is commonly present in buildings constructed prior to 1978, and activities such as demolition, sanding, cutting, or the use of heat guns can release lead-containing dust or particulates into the air. Exposure to airborne lead could affect construction workers and nearby sensitive receptors if appropriate controls are not implemented.

A building assessment prepared by Forensic Analytical Consultants confirmed the presence of lead-based paint in buildings proposed for demolition and renovation (FACS, 2026). In the absence of proper controls, disturbance of these materials could result in adverse air quality impacts. However, demolition and renovation activities that disturb LBP are subject to strict federal and State regulations that are designed to minimize emissions and protect human health.

Applicable regulations include the U.S. Environmental Protection Agency (EPA) Renovation, Repair, and Painting (RRP) Rule (40 CFR Part 745) and the Cal/OSHA Lead in Construction Standard (8 CCR §1532.1). These rules require identification of lead-containing materials, implementation of

engineering controls, worker protection measures, containment of dust, and proper cleanup and disposal practices. Compliance with these regulations would minimize the potential for release of airborne lead and reduce exposure risks to less-than-significant levels.

For buildings proposed for demolition, lead-based paint would be removed through regulated abatement procedures conducted by CDPH-certified lead abatement contractors prior to demolition activities. For structures proposed for remodeling, LBP would either be removed (abatement) or safely managed in place through encapsulation or enclosure, depending on the condition of the materials and the nature of construction activities. Encapsulation involves applying a durable protective coating over lead-containing surfaces to prevent the release of dust, while enclosure isolates the material behind a barrier. These methods are recognized regulatory approaches for managing LBP where full removal is not necessary.

All abatement, encapsulation, or disturbance of lead-containing materials would be conducted in accordance with applicable EPA and Cal/OSHA requirements. Required notifications would be submitted, work would be performed by trained and certified personnel, and all lead-containing waste would be profiled, handled, and disposed of in accordance with California hazardous waste regulations, including Department of Toxic Substances Control (DTSC) requirements.

Because the project would comply with all applicable federal and State regulations governing the handling of lead-based paint, and because these regulations are specifically designed to avoid significant emissions and health risks, impacts related to demolition and renovation of structures containing lead-based paint would be **less than significant.**

Localized PM Concentrations

Fugitive dust emissions would primarily result from site preparation, grading, and vehicle movement on both unpaved and paved surfaces. If left uncontrolled, these emissions could contribute to nuisance impacts for nearby receptors. The project would be subject to SJVAPCD Regulation VIII – Fugitive PM_{10} Prohibitions, which would require the contractor to prepare and submit a dust control plan and implement dust control measures over the course of construction, such as site watering. Through the implementation of a dust control plan, the impact would be **less than significant**.

Deisel Particulate Matter

Construction of the project would generate short-term diesel particulate matter (DPM) emissions from off-road equipment and on-road diesel trucks, which could temporarily increase localized concentrations near sensitive receptors. A modified screening-level health risk prioritization analysis, based on CAPCOA guidance and conservatively assuming close receptor proximity and continuous emissions, indicates that the project would result in a modified total facility score of approximately 4.16 when adjusted to reflect the 15-month construction duration. This score falls at the low end of the intermediate range and represents a conservative estimate of potential risk. Given the short-term and intermittent nature of construction emissions, the conservative exposure assumptions applied, and reduced receptor presence during portions of construction when students are not on-site, DPM emissions would not expose sensitive receptors to a substantial cancer risk. Therefore, construction-related toxic air contaminant impacts would be **less than significant**.

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

Less than Significant Impact

According to the SJVAPCD GAMAQI (San Joaquin Valley Air Pollution Control District, 2015), due to the subjective nature of odor impacts, the number of variables that can influence the potential for an odor impact, and the variety of odor sources, there are no quantitative or formulaic methodologies to determine the presence of a significant odor impact. Rather, SJVAPCD recommends that odor analyses strive to fully disclose all pertinent information. The intensity of an odor source's operations and its proximity to sensitive receptors influence the potential significance of odor emissions. SJVAPCD has identified some common types of facilities that have been known to produce odors in the San Joaquin Valley.

During construction, the project may produce odors associated with construction, such as vehicle exhaust odor, asphalt degassing, and paint fumes, although these odors are expected to be intermittent and would no longer be present once construction is complete.

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

4. Biological Resources

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U. S. Fish and Wildlife Service?		X		
b. Have a substantially adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or U. S. Wildlife Service?				X
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				X
d. Interfere substantially with the movement of any resident or migratory fish or wildlife species or with established native resident migratory wildlife corridors, or impede the use of native wildlife nursery sites?				X
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?			X	
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?				X

Environmental Settings

The project site consists of a fully developed elementary school. Surrounding land uses include residences, to the north, east, south, and west. The project site is substantially surrounded by urban land uses.

Would the project:

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

Less than Significant Impact with Mitigation Incorporated

According to a review of the California Natural Diversity Database (CNDDB), the project site does not contain any sensitive natural communities (CDFW, 2025). The project site is highly developed and surrounded by urban land uses, making it unsuitable habitat for candidate, sensitive, or special status species. However, multiple landscape trees are located at the project site that may provide habitat for

nesting birds. Buildings proposed for demolition could also provide nesting habitat for birds. Trees and buildings that would be removed during construction may potentially significantly impact nesting birds if removal/demolition occurs during the nesting bird season. Therefore, the project shall implement the following mitigation to reduce the impact to less than significant.

Mitigation Measure BR-1: Nesting Bird Avoidance and Minimization. The nesting bird season is between February 1st and August 31st. Trees are expected to be removed at the project site and should be removed before construction begins to prevent birds from nesting in those trees during construction, and those trees should be removed outside of the nesting bird season. As in, trees should be removed between September 1st and January 31st. Structures proposed for demolition could also be used as nesting habitat. Buildings should also be demolished outside of nesting bird season:

If trees or structures must be removed during the nesting bird season, then a qualified biologist shall perform a pre-construction nesting bird survey to determine whether birds are currently nesting in trees or structures at the project site.

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

With the implementation of Mitigation Measure BR-1, this impact would be **less than significant with mitigation incorporated.**

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

No Impact

According to a review of the California Natural Diversity Database (CNDDB), the project site does not contain any riparian habitat or sensitive natural communities (CDFW, 2025). Additionally, the site is a fully developed elementary school campus. The project would have **no impact.**

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

No Impact

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

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

No Impact

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

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

Less than Significant Impact

The City of Fresno's ordinance requires projects to replace trees, if feasible, whenever they are removed during construction on public property (City of Fresno, 2025). The public right-of-way portions of the project site does not contain any trees so the City's ordinance does not apply to the campus portion of the project site. The project would remove existing trees at the campus where they conflict with the new configuration of the proposed project. In line with the intent of the City's tree replacement ordinance, the project will include trees planting as a part of the landscape plans, and existing trees would be preserved in place where feasible. Therefore, the project would have a **less than significant impact.**

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

No Impact

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

5. Cultural Resources

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Cause a substantial adverse change in the significance of a historical resource pursuant to State CEQA Guidelines § 15064.5?			X	
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to State CEQA Guidelines § 15064.5?		X		
c. Disturb any human remains, including those interred outside of formal cemeteries?		X		

A *Historical Architectural Survey Report* (HASR) was prepared for this project by Karana Hattersley-Drayton of Johnston and Associates and is included in Appendix B.1 of this Initial Study. The study provides a summary of the project regulatory and environmental setting for historical resources, study methods, findings, historic resource evaluations, and management recommendations. Due to changes to the scope of the project during the preparation of this Initial Study, a secondary *Letter to File, Addendum to Historic Review for Proposed Norseman Elementary School Modernization Project* was prepared for the project, and is included in Appendix B.2. This Initial Study incorporates information and analysis from these reports to evaluate potential impacts to Cultural Resources.

A California Historic Resources Information System's (CHRIS) records search was completed for the Project location, received on November 12, 2025. The CHRIS search found that four studies have been completed within a one-mile radius of the project site. No recorded cultural resources were found within the project site, and there are 25 recorded cultural resources within a one-mile radius mostly related to historic era buildings, and an historic era canal.

Regulatory Setting

Under CEQA, lead agencies must assess whether discretionary projects could significantly impact cultural resources. A significant impact occurs if a project would substantially alter or damage a historical resource—defined as a building, site, structure, object, or district with historical, cultural, architectural, archaeological, or scientific value (14 CCR §15064.5[b]). Such resources are those listed in or eligible for listing in the California Register of Historical Resources (CRHR). If adverse effects cannot be avoided, mitigation is required to reduce harm to the resource's significance (PRC §21083.2[c]), and these measures must be enforceable (14 CCR §15064.5[b][4]).

For this Initial Study, a cultural resource includes archaeological sites or historical-era properties (typically 45 years or older). Whether a resource is considered "historical" depends on its eligibility for the CRHR based on established significance criteria (14 CCR §15064.5[a]).

Would the project:

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

Less than Significant Impact

The project would demolish classroom buildings G, H, and I, as well as complete an interior remodel of administrative office building E and classroom building J, five permanent buildings constructed in 1956. Portable classroom buildings (P1 through P16) would also be demolished. The portable buildings were determined to lack historical significance due to their temporary, utilitarian nature and, accordingly, were not evaluated in the Historical Architectural Survey Report (HASR) included in Appendix B.1.

As documented in the HASR, an architectural historian meeting the Secretary of the Interior's Professional Qualifications evaluated four permanent buildings (G, H, I, and E). The HASR notes that while the larger campus retains integrity as an example of a mid-century Finger-Plan elementary school and reflects work of a regional architectural firm of importance, Coates and Metz, the individual buildings proposed for demolition/remodeling are typical of elementary school construction of the era and do not exhibit distinguishing architectural or associative characteristics that convey historical significance. The HASR further determined that the four buildings proposed for demolition/reconstruction are not listed, not determined eligible, and do not appear eligible for listing in the California Register of Historical Resources under any of the criteria.

Note that the naming convention of buildings at the existing campus changed from the time of the preparation of the HASR to the time of preparation of this Initial Study. The HASR refers to the three eastern classroom buildings as Buildings H, J, and K, while this Initial Study refers to these same buildings as Buildings I, G, and H, respectively. The HASR refers to the existing central administrative office building as "Office" while this Initial Study refers to this building as Building E.

The *Letter to File, Addendum to Historic Review for Proposed Norseman Elementary School Modernization Project* included in Appendix B.2 later evaluated Building J. This building is a classroom wing connected to Building A by a covered walkway in the center-north of the campus and is proposed to undergo an internal remodel to convert the building to a library. The Letter to File was prepared by the same architectural historian meeting the Secretary of the Interior's Professional Qualifications and found that this building is not listed or eligible for listing in the California Register of Historical Resources under any of the criteria and is therefore not considered a cultural resource.

Because the evaluated buildings are not considered historical resources for purposes of CEQA as defined in State CEQA Guidelines §15064.5(a), their demolition would not constitute a substantial adverse change in the significance of a historical resource under §15064.5(b). Therefore, the project would result in a **less than significant** impact related to historical resources.

b. Cause a substantial adverse change in the significance of an archeological resource pursuant to State CEQA Guidelines Section 15064.5?

Less than Significant Impact with Mitigation

Historic aerial imagery indicates that the project site was used for agricultural purposes from at least 1937, with no evidence of residential or structural development prior to campus construction (UCSB

Library, 1937). Norseman Elementary School was constructed in 1956 and has operated as an elementary school since that time.

A records search conducted through the California Historical Resources Information System (CHRIS) and a Sacred Lands File (SLF) request submitted to the Native American Heritage Commission (NAHC) were completed for the project. As shown in Appendix E, the CHRIS search found no previously recorded archaeological resources on the project site, although four prior cultural studies have been conducted within one mile, and 25 cultural resources have been documented within one-half mile of the site—primarily historic-era buildings and a historic canal. The NAHC SLF search returned negative results.

As discussed further in Section 18, *Tribal Cultural Resources*, all California Native American tribes traditionally and culturally affiliated with the project area were notified of the project via certified mail on November 14, 2025, and invited to consult. No responses have been received at the time of publication of this Draft IS/MND.

Although no known archaeological resources are present within the project site, ground-disturbing activities such as demolition, grading, and utility trenching have the potential to uncover previously unknown archaeological materials. If such resources were encountered and not properly managed, their disturbance could result in a significant impact under CEQA. Therefore, the project incorporates Mitigation Measure CULT-1, which requires an immediate stop-work order, protection of the discovery location, and evaluation by a qualified archaeologist consistent with the procedures outlined in State CEQA Guidelines §15064.5.

In addition, if any inadvertent discovery is determined to be Native American in origin, Mitigation Measure TC-1 (see Section 18, *Tribal Cultural Resources*) would be implemented, ensuring that tribes are notified and that culturally appropriate treatment measures are developed in consultation with tribal representatives.

CULT-1: Inadvertent Discovery of Archaeological Resources
If prehistoric or historic archaeological materials are encountered at any time during ground-disturbing activities, including grading, excavation, trenching, or demolition, all work within 50 feet of the discovery shall stop immediately. The construction contractor shall notify the District, who shall retain a qualified archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards to evaluate the find.

The archaeologist shall:

1. Evaluate whether the resource meets the definition of a historical resource under State CEQA Guidelines Section 15064.5(a) or a unique archaeological resource under Public Resources Code Section 21083.2.
2. Recommend appropriate treatment, which may include preservation in place, avoidance, protective fencing, or data recovery consistent with CEQA Guidelines Section 15126.4(b)(3).
3. Prepare a short letter report documenting the discovery, the evaluation, and the recommended treatment.

Work may not resume within the discovery area until the qualified archaeologist determines that the resource has been appropriately treated and the District authorizes resumption of construction. All

recovered materials shall be curated at an appropriate curation facility, if required, and all records shall be filed with the California Historical Resources Information System (CHRIS).

Implementation of **CULT-1** and **TC-1** would ensure that any unanticipated archaeological or tribal cultural resource discoveries are appropriately assessed and treated, reducing potential impacts to **less than significant with mitigation**.

c. Disturb any human remains, including those interred outside of dedicated cemeteries?

Less than Significant Impact with Mitigation

There are no known human remains within the project site, and the site is not located within or adjacent to a cemetery. Therefore, the likelihood of encountering human remains during construction is considered low. However, because ground-disturbing activities can uncover previously unknown remains, accidental discovery cannot be entirely ruled out.

In the event that human remains are encountered during construction, the project would implement Mitigation Measure CULT-2, which requires compliance with California Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98. These statutes mandate that work in the vicinity of the find would stop immediately, the County Coroner would be notified, and if the remains are determined to be of Native American origin, the Native American Heritage Commission would be contacted to identify a Most Likely Descendant. The remains would then be treated in accordance with applicable law and cultural protocols before work resumes.

Mitigation Measure CULT-2: Accidental Discovery of Human Remains:
If human remains are discovered during any phase of construction or ground-disturbing activity, all work in the vicinity of the find would immediately stop, and the area would be secured to prevent further disturbance. The construction contractor would promptly notify the County Coroner, who would determine whether the remains are subject to the provisions of California Health and Safety Code Section 7050.5. If the Coroner determines that the remains are of Native American origin, the Coroner would notify the Native American Heritage Commission within 24 hours, as required by Public Resources Code Section 5097.98. The Native American Heritage Commission would then designate a Most Likely Descendant. The project proponent, in consultation with the Most Likely Descendant, would ensure that the remains are treated in accordance with the recommendations of the Most Likely Descendant, which may include reburial in a location not subject to further disturbance or other culturally appropriate measures. Work in the area would not resume until the remains have been appropriately treated and the Coroner and Native American Heritage Commission have provided clearance.

With implementation of this Mitigation Measure CULT-2, potential impacts related to the disturbance of human remains would be **less than significant with mitigation.**

6. Energy Resources

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

Environmental Setting

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

The consumption of non-renewable energy is directly related to air quality and greenhouse gas (GHG) emissions. The demand for fossil fuels from transportation, building operations, and energy generation contributes to the emission of criteria air pollutants and greenhouse gases. These environmental impacts are discussed in detail in Section 3 *Air Quality*, and Section 8, *Greenhouse Gas Emissions,* and the *Air Quality & Greenhouse Gas Impact Analysis* in Appendix A.

Regulatory Setting

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

Would the project:

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

Less than Significant

Construction-Related Energy Consumption

Construction of the proposed project would require temporary energy use, including diesel and gasoline consumption associated with off-road equipment, haul trucks, and worker commute vehicles. These

activities would be typical of a school modernization project and would not involve unusually intensive or inefficient energy demands. Construction fuel use would be temporary, short-term, and limited to the duration of demolition and reconstruction activities.

Construction of the project would not require new energy infrastructure or result in substantial increases in peak electricity demand. Compliance with applicable California Air Resources Board regulations governing off-road equipment and on-road vehicle standards would further ensure that fuel is used efficiently. As a result, construction activities would not result in wasteful, inefficient, or unnecessary energy consumption. Therefore, construction-related energy impacts would be **less than significant.**

Operational Mobile-Source Energy Consumption

Operational mobile-source energy consumption would primarily be associated with vehicle trips generated by students, staff, and visitors. Because the project would reconstruct an existing elementary school without increasing capacity or enrollment, operational trip generation, and therefore mobile-source fuel consumption, would not increase compared to existing conditions. Furthermore, the project would include electric vehicle charging parking stalls, according to CalGreen code. Accordingly, the project would not result in additional or wasteful operational transportation energy use. Therefore, mobile-source energy impacts would be **less than significant.**

Operational On-site Energy Consumption

Operation of the project would involve electricity consumption for building heating, cooling, ventilation, lighting, plug loads, outdoor lighting, and grounds maintenance. The proposed new buildings would be constructed to meet or exceed the most current Title 24 energy efficiency standards, which are significantly more energy-efficient than the original buildings constructed in 1956. Replacement of outdated structures with modern, code-compliant facilities would reduce long-term energy demand compared to existing conditions. This would include on-site solar photovoltaic panels and on-site battery storage further reducing energy grid consumption.

Given compliance with state energy efficiency requirements and the replacement of older and less efficient facilities, operational energy consumption would not be considered wasteful, inefficient, or unnecessary. Therefore, operational energy impacts would be **less than significant.**

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

Less than Significant Impact

The proposed project would not conflict with or obstruct any state or local plan for renewable energy or energy efficiency. As discussed previously in this section, the project would reconstruct an existing elementary school without increasing enrollment or operational energy demand beyond existing conditions. The project would incorporate modern building systems and energy-efficient design features that comply with the most current Title 24 Building Energy Efficiency Standards and CALGreen requirements, which collectively advance California's long-term renewable energy and energy-efficiency objectives.

The State of California's Energy Efficiency Strategic Plan establishes goals for progressively increasing energy efficiency in new and renovated buildings, including movement toward net-zero energy performance in state facilities. By adhering to current and future Title 24 and CALGreen standards, the project would incorporate energy-efficient building envelopes, mechanical systems, lighting systems, and

water-heating technologies, thereby reducing operational energy consumption relative to the existing 1956 buildings.

Compliance with these codes also requires provisions that support the State's renewable and clean energy transition such as photovoltaic-ready infrastructure, energy-storage readiness where applicable, and electric vehicle (EV) capable parking spaces, all of which facilitate long-term reductions in fossil-fuel consumption.

In addition, Mitigation Measure GHG-1, prioritize electrification of building mechanical equipment and appliances to further reduce the project's reliance on fossil fuels. This measure aligns with California's adopted greenhouse gas reduction strategies, which emphasize electrification as a key pathway for reducing long-term emissions from the building sector.

Through compliance with state energy-efficiency regulations and implementation of project design features and Mitigation Measure GHG-1, the project would be consistent with applicable state renewable-energy and energy-efficiency plans, goals, and policies. Therefore, the project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency, and impacts would be **less than significant.**

7. Geology and Soils

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

Environmental Setting

Proximity to Earthquake Faults and Seismic Activity

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

from seismic shaking. According to the MHP, liquefaction has not been observed within the City of Fresno (County of Fresno, 2018).

Soil Type, Drainage, and Groundwater Levels.
The main project site is underlain by Atwater sandy loam at the project's northwest half and Tujunga loamy sand at the project's southeast half (USDA, 2025). However, it should be noted that the project is an existing elementary school that has likely been covered in backfill appropriate for building construction and turf fields.

Groundwater depth can be estimated using data from the California Department of Water Resources' California's Groundwater Live website. A well approximately 7.4 miles east (Site Code: 367717N1196088W001) last measured a depth to groundwater of 62.80 feet on September 30, 2025 (California Department of Water Resources, 2025). According to the North Kings Groundwater Sustainability Agency 2024 Annual Report, the project site is located downgradient from this monitoring well and the groundwater levels are approximately 110 ft deeper, according to groundwater level contour maps provided in the report (Kings Subbasin Groundwater Sustainability Agencies , 2024).

Would the project:

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

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

Less than Significant Impact
The project is not located within an Earthquake Fault Zone (United States Geologic Survey, 2021). Additionally, the project's new construction would adhere to newer building codes, providing for safer buildings during earthquakes. The project would have a **less than significant impact.**

(ii) Strong seismic ground shaking?

Less than Significant Impact
The project is located within the City of Fresno which has a relatively low seismic hazard, though moderate risk for earthquake-related damage. However, the use of modern building codes would improve the project site's safety. The project would have a **less than significant impact.**

(iii) Seismic-related ground failure, including liquefaction?

No Impact
The City of Fresno has had no recorded instances of liquefaction. There would be **no impact.**

(iv) Landslides?

No Impact
The project is located on flat land surrounded by flat land, and therefore not at risk for landslides. There would be **no impact.**

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

Less than Significant Impact

Soil erosion is more likely to occur during construction than after construction. The project is over 1 acre is size and would involve soil disturbance. Therefore, the project would be required to receive coverage under State Water Resources Control Board Order 2022-0057-DWQ, California General Permit for Stormwater Discharges from Construction Activity (CGP). To maintain coverage under the CGP, the site would need to prepare and implement a Storm Water Pollution Prevention Plan (SWPPP) which would require practices that reduce or eliminate soil erosion.

After construction, the project's topsoil would be covered in hardscape or landscape. Hardscape includes concrete, asphalt, or buildings, and landscape would include grassy turf, mulch, or decomposed granite. As the project's topsoil is mostly or completely covered, soil erosion is not expected after construction. Furthermore, the CGP requires that sites show equal or less soil erosion potential after construction than before construction.

The project would be implementing CGP requirements during construction to reduce soil erosion, and the project's topsoil will be covered and stabilized after construction which prevents soil erosion after construction. Therefore, the project would have a **less than significant impact.**

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

No Impact

According to the California Geological Survey and the HMP, the project site is not located within any known Earthquake Hazard Zone, Liquefaction Hazard Zone, or Landslide Hazard Zone. There would be no impact.

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

No Impact

The soil species underlying the project site do not contain clay and are therefore not considered expansive soils. Additionally, any backfill used during construction would consist of appropriate soil types to avoid soil expansion. The project would have **no impact.**

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

No Impact

The project would connect to the City of Fresno sanitary sewer system and would not require septic tanks or alternative wastewater disposal systems. There would be **no impact.**

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

Less than Significant Impact with Mitigation Incorporated

The project site has been disturbed in the past by the construction of an elementary school, and no known paleontological resources were ever recorded for the project site. However, the possibility remains that the inadvertent or accidental discovery could occur during ground-disturbing construction activities.

Mitigation Measure GEO-1, below, would serve to protect the accidental discovery of paleontological resources. As such, the impact is **less than significant with mitigation incorporated.**

> **Mitigation Measure GEO-1**: **Inadvertent Paleontological Resource Discovery.** If paleontological resources are inadvertently discovered during ground-disturbing activities, all work within 50 feet of the discovery shall be halted and the construction supervisor shall immediately notify the District and retain a qualified paleontologist who meets the standards of the Society of Vertebrate Paleontology (Impact Mitigation Guidelines Revision Committee - Society of Vertebrate Paleontology, 2010) to evaluate the find. The paleontologist shall assess the significance of the discovered resource in accordance with CEQA Guidelines Section 15064.5 and SVP guidelines.
>
> If the find is determined to be a significant paleontological resource, the paleontologist shall develop and implement a treatment plan in consultation with the lead agency. The treatment plan may include, but is not limited to, recovery and curation of the resource at an accredited repository, documentation of the find, and preparation of a report summarizing the methods and results of the recovery. Ground-disturbing activities in the vicinity of the discovery shall not resume until the paleontologist determines that the site has been appropriately managed and cleared for continued work.

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

8. Greenhouse Gas Emissions

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

An Air Quality & Greenhouse Gas Impact Analysis report was prepared for this project by Blair, Church & Flynn and is included as Appendix A to this Initial Study. This Initial Study incorporates information and analysis from this report to evaluate Greenhouse Gas (GHG) related project impacts.

Regulatory Background

Federal Regulations

Federal Clean Air Act

The FCAA was initially signed into law in 1970, to attain national air quality standards, or the National Ambient Air Quality Standards (NAAQS). Each state is required to establish and meet its own State Implementation Plans (SIPs). An amendment in 1990 requires states to revise their SIPs or have the federal government establish its own Federal Implementation Plan (FIP) should a state fail to meet its SIP. The U.S. Environmental Protection Agency is responsible for implementing the FCAA, including developing NAAQS.

State Regulations

California Clean Air Act

The California Clean Air Act of 1988 establishes the responsibilities of the Air Resources Board (ARB) of California. These responsibilities include the development of the California Ambient Air Quality Standards, which are more encompassing and stringent than the national standards (i.e., the NAAQS). Additionally, the CCAA requires that the ARB oversee regionalized air quality control districts to ensure they achieve their ambient air quality standards.

Air Resources Board – 2017 and 2022 Scoping Plan

The Air Resources Board (ARB) adopted Scoping Plans in 2017 and 2022, which address emission reduction targets set by SB 32 and AB 1279, respectively. The 2017 scoping plan's goal is to reduce emissions 40% below 1990 emissions by 2030 (California Air Resources Board, 2022). The 2022 Scoping Plan builds upon the 2017 plan by aiming for carbon neutrality by 2045 (California Air Resources Board, 2022). Both plans discuss measures and strategies to help achieve these goals.

Regional Regulations

San Joaquin Valley Air Pollution Control District (SJVAPCD) Climate Action Plan

The SJVAPCD's Climate Change Action Plan (CCAP) was released in 2009 and discusses the SJVAPCD's thresholds for significance for GHG impacts. The CCAP based its requirements on the Air Resources Board's (ARB's) original scoping plan in 2008 (San Joaquin Valley Air Pollution Control District, 2009). The CCAP, therefore, states that a project's impact is less than significant if a project's GHG emissions are 29% less than Business as Usual emissions. BAU emissions are GHG emissions modeled to occur in 2020, based on a 3-year average (2002-2004). The 29% reduction standard is the difference between 2020 BAU emissions to 1990 levels. The ARB's most recent scoping plan sets a goal of achieving 40% emission reductions below the 1990 levels by 2030. A consistency analysis was performed to show that the project is consistent with the 2022 Climate Change Scoping Plan's 40% below 1990 emissions goal, and the project is therefore consistent with the SJVAPCD's CCAP 1990 emissions goal.

Local

Fresno Council of Governments Regional Transportation Plan and Sustainable Communities Strategy

The FCOG's RTP/SCS contains goals that would improve the accessibility and mobility for communities in Fresno County, while also considering the overall impact of transportation on climate change, health, and equity (Fresno Council of Governments, 2024). The project was analyzed by checking the project's consistency with the FCOG's RTP/SCS's goals, as listed in Chapter 4, Implementing the Plan, of this Initial Study.

Fresno Council of Governments Priority Climate Action Plan

The FCOG intends to prepare a comprehensive, regional climate action plan, and the Priority Climate Action Plan (PCAP) is the first component of this process. The FCOG received funding from the federal government through the Inflation Reduction Act of 2022 to develop the PCAP, and its purpose is to inventory greenhouse gas emissions within Fresno County and to propose industry-based reduction measures. FCOG's next step is to develop a Comprehensive Climate Action Plan which will build upon the PCAP. The PCAP does not currently provide a reduction goal like the ARB's 2022 Scoping Plan, but the project will still be analyzed for consistency with the PCAP to ensure the project does not impact any applicable greenhouse gas reduction efforts.

Determination of Significant Impacts

As of July 2026, CARB, SJVAPCD, the County of Fresno, or the City of Fresno have not adopted recommended numerical GHG significance thresholds applicable to development projects for CEQA purposes. Therefore, the methodology for evaluating the project's impacts related to GHG emissions focuses on its consistency with statewide, regional, and local plans that have been adopted to reduce and mitigate GHG emissions. This approach has been deemed appropriate for analyzing a project's GHG impact by the Governor's Office of Planning and Research and has been upheld in court challenges (Governor's Office of Planning and Research, 2018) (Mission Bay Alliance v. Office of Community Investment & Infrastructure, 2016). This evaluation of consistency with such plans serves as the sole basis for determining the significance of the project's GHG-related impacts on the environment. The project's GHG emissions have been quantified and are included in this Initial Study for informational purposes.

Would the project:

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

Less than Significant Impact

Short-Term Construction

Construction of the proposed project would generate temporary GHG emissions associated with demolition, operation of off-road construction equipment, haul truck trips, and worker commute trips. As summarized in Table 12 in Appendix A, total construction emissions are estimated at 377.32 metric tons of CO_2 equivalent ($MTCO_2e$) over the full construction period. When amortized over an assumed 30-year project life, construction emissions would average approximately 12.58 $MTCO_2e$ per year.

Construction-related emissions would vary depending on the final construction schedule, specific equipment used, and daily activity levels. A small amount of GHG emissions would also result from construction waste disposal; however, the exact amount is speculative and would not materially affect the analysis.

Because construction emissions would be temporary and typical of a school redevelopment project, and because amortized annual emissions represent a small contribution to long-term GHG totals, construction-related GHG emissions would be **less than significant.**

Long-Term Operation

Table 13 in Appendix A summarizes the project's operational GHG emissions for Phase 1 in 2029 and Phase 2 in 2029, compared to existing school operations. Including amortized construction emissions, total operational GHG emissions for the completed project are estimated at 119.39 $MTCO_2e$ per year.

By phase, the estimated emissions are:

- 110.73 $MTCO_2e$ in Phase 1 (2029)
- 8.66 $MTCO_2e$ in Phase 2 (2029)

The majority of operational emissions, approximately 87.15%, would originate from building energy use, while 10.83% would result from solid waste decomposition.

Importantly, the project would not increase student enrollment or building capacity. As a result, mobile-source emissions from vehicle trips (i.e., VMT-related emissions) would not increase compared to existing conditions.

Given the relatively small magnitude of operational GHG emissions, the lack of an increase in VMT, and the project's consistency with typical redevelopment emission profiles, the project's operational GHG emissions would be **less than significant.**

b. Conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?

Less than Significant with Mitigation Incorporated

Appendix A of this Initial Study includes a consistency analysis of the following applicable plans, policies, and regulations that have been adopted for the purpose of reducing emissions of greenhouse gases.

CARB's 2022 Climate Change Scoping Plan

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

Key strategies to achieve SB 32's goals include promoting sustainable communities through zero net energy buildings and enhanced transportation options that reduce vehicle miles traveled (VMT). Additional measures focus on increasing the use of low-carbon fuels and cleaner vehicles. The project is consistent with all applicable measures of the CARB's 2022 Scoping Plan, with the addition of Mitigation Measure GHG-1 limiting new natural gas usage, as discussed in Table 14 in Appendix A.

FCOG 2022 Regional Transportation Plan and Sustainable Communities Strategies

The FCOG's 2022 RTP/SCS outlines transportation strategies aimed at reducing regional GHG emissions. The project would not increase vehicle miles traveled (VMT), demonstrating that the project aligns with planned growth and the objectives set forth in the FCOG's 2022 RTP/SCS. The project is consistent with all applicable measures, as shown in Table 15 in Appendix A.

FCOG Priority Climate Action Plan

The FCOG's PCAP outlines five draft measures for the transportation sector, ten for the building energy sector, and four for the waste sector. The project is consistent with all applicable measures, with the addition of Mitigation Measure GHG-1, as shown in Table 16 in Appendix A.

As previously noted, the proposed project aligns with regional vehicle miles traveled (VMT) reduction targets since it would not increase VMT. However, it does not incorporate Best Management Practices necessary to fulfill its "fair share" in supporting the State's long-term climate objectives for carbon neutrality by 2045 related to building decarbonization. This impact would be considered potentially significant, therefore Mitigation Measure GHG-1 would be incorporated into the project.

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

Mitigation Measure GHG-1 would prioritize the construction of electrical mechanical systems, appliances, and other infrastructure in place of the use of natural gas. This measure would further minimize the project's on-site GHG emissions. With this mitigation in place, and as discussed above, the proposed project would align with CARB's 2022 Climate Change Scoping Plan, and the FCOG's 2022 RTP/SCS, the FCOG's PCAP to contribute its fair share toward achieving the State's carbon neutrality goal by 2045, as outlined in Executive Order B-55-18.

With mitigation, the project's GHG emissions would not result in significant environmental impacts or conflict with applicable GHG reduction policies, plans, or regulations, therefore this impact would be considered **less than significant with mitigation incorporated.**

9. Hazards and Hazardous Materials

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			X	
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?			X	
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?			X	
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				X
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?			X	
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?			X	
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?				X

Regulatory Setting

Department of Toxic Substances Control

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

Asbestos – Federal NESHAP and SJVAPCD Implementation

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

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

Worker Protection—Cal/OSHA Asbestos and Lead Standards

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

Imported Fill for Sensitive Uses (Schools)

If the project includes importing soil, the District would apply DTSC's Clean Imported Fill Material advisory (case-by-case screening of source areas, analyte selection, and sampling frequency) to avoid introducing contaminated soil to sensitive land uses such as schools. Although advisory and not regulatory, it is a widely used state reference for campus work (DTSC, 2001).

Hazardous Materials Handling, Transport, and Disposal

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

Hazardous Material and Waste Handling Regulations

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

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

On-Site Hazardous Settings

A Phase I Environmental Site Assessment (ESA) was prepared for the project by Certerra Southwest, LLC dba Certerra RMA GeoScience (Certerra), which is included as Appendix C and was used to evaluate the potential presence of recognized environmental conditions (RECs) associated with the project site. The Phase I ESA

identified historical agricultural land uses and recommended a Phase II ESA investigation to evaluate the potential presence of residual agricultural pesticides in site soils.

In response to the Phase I ESA findings, the District conducted a Phase II ESA to characterize potential pesticide-related contamination. In addition, a hazardous building materials assessment was completed for the existing structures proposed for demolition and renovation to evaluate the presence of asbestos-containing materials (ACMs), lead-based paint (LBP), and other potential hazardous building materials. Although the Phase II ESA and hazardous building materials assessment are not included as appendices to this Initial Study, the findings and recommendations of these investigations were reviewed and incorporated into the hazardous materials analysis presented below.

Phase I Environmental Site Assessment

The Phase I ESA evaluated the potential presence of recognized environmental conditions (RECs) associated with the project site. The assessment found no evidence of RECs, Controlled RECs (CRECs), Historical RECs (HRECs), vapor encroachment conditions, or other environmental conditions indicating the release of hazardous materials at the site. Historical records indicate that the property was used for agricultural purposes prior to development of the school campus in the mid-1950s, after which it has remained in educational use. Based on this historical agricultural use, the Phase I ESA recommended a Phase II investigation to evaluate the potential presence of residual agricultural pesticides in site soils. Aside from this recommendation, the Phase I ESA identified no environmental conditions that would be expected to adversely affect the proposed project.

Phase II Environmental Site Assessment

A Phase II ESA was prepared by Wilbanks Environmental Consulting, Inc. (WEC) for the project based on the recommendations of the Phase I ESA. The scope of the Phase II ESA included:

- This investigation included collection of 24 discrete shallow soil samples in accordance with Department of Toxic Substances Control (DTSC) I*nterim Guidance for Sampling Agricultural Fields That are Proposed for School Sites*.
- The samples were composited by the analytical laboratory into eight, three-part composite samples for analyses of organochlorine pesticides by EPA Method 8081A, and CAM-17 Metals, including arsenic and lead, by EPA Methods 6010B and 7471A.
- Concentrations of detected analytes were compared to the most recent Regional Water Quality Control Board (RWQCB) Environmental Screening Levels (ESLs) and DTSC Regional Screening Levels (SLs).

The results of soil sample laboratory analysis were:

- Soil samples indicated, barium, chromium, cobalt, copper, lead, nickel, vanadium, and zinc were detected above their respective laboratory reporting limits. Although above their reporting limit, concentrations detected were all below respective screening levels.
- Arsenic concentrations exceeded the applicable ESL. However, the detected concentrations are within the range of naturally occurring background concentrations commonly reported in Fresno County and throughout the San Joaquin Valley and therefore do not indicate the release of a hazardous substance.

- No detectable concentrations of other metals or OCPs were identified in any of the samples submitted for analyses.
- No environmental conditions were identified that would adversely affect the project and no additional environmental investigations were recommended for the site.

Hazardous Building Materials Survey Report

In accordance with these regulatory requirements, the District conducted a hazardous building materials survey of all buildings proposed for demolition at the project site. The survey, prepared by Forensic Analytical Consulting Services (FACS), identified non-friable asbestos-containing materials in all permanent buildings and portable buildings, including roofing, window putty, seam and siding sealant, plaster, door frame sealant, exterior stucco, drywall, plaster, boiler insulation, transite pipe, and spray foam roofing (FACS, 2026).

Emergency Plans and Evacuations

Fresno County adopted a multi-jurisdictional hazard mitigation plan in 2009, with the most recent version adopted in 2018 (County of Fresno, 2018). This plan addresses concerns throughout Fresno County and discusses specific hazards that may affect the City of Fresno.

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

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

Would the project:

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

Less than Significant Impact

As identified in the hazardous building materials survey report the project would involve the transportation of demolished/removed asbestos and lead based paint (LBP) material. This transportation would be short-term and all transportation would comply with applicable NESHAP, EPA, and Cal/OSHA regulations and requirements related to the transportation of hazardous materials to protect human and environmental health.

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

During operation, the project site would need to comply with the same State and Federal regulations by which they are currently abiding. The proposed project would have the same uses as the existing site (e.g., classrooms, multi-purpose room, maintenance, and parking lot). Small quantities of hazardous materials such as, but not limited to, cleaners, paint, paint thinners, gasoline, and automotive fluids are already regularly transported to the project site. The District will continue to implement necessary best management practices to minimize the risk of hazardous material spills and exposure during transport.

Implementing existing regulations would ensure that the project would not create a significant hazard to the public or environment related to the use, transport, disposal, accidental release, or handling of hazardous materials, substances, or waste. Impacts would therefore be **less than significant.**

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

Less than Significant Impact

For reasons discussed in 9.a, the impact of the project would be **less than significant.**

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

Less than Significant Impact

The project site is located at the existing Norseman Elementary School campus. During normal operation, the District is expected to maintain the site using potentially hazardous materials such as, but not limited to, pesticides, fertilizers, paint, cleaning fluids, and solvents. However, the District would comply with State and Local regulations to ensure that hazardous materials are properly used, stored, and transported. Impacts would be **less than significant.**

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

No Impact

The project is not located on a site that is included on a list of hazardous materials site compiled per Government Code Section 65962.5 (Department of Toxic Substances, 2025). Soil contamination investigations completed of the Phase I and Phase II ESA further confirm that the site does not have historical soil contamination that would create a hazard to the public or environment and is not eligible for listing. There would be **no impact.**

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

Less than Significant Impact

The project site is located within the Fresno Yosemite International Airport Airport Influence Area (AIA) and is subject to the Fresno Council of Governments (FCOG) Airport Land Use Compatibility Plan (ALUCP). The site is within Zone 6 (Traffic Pattern Zone), which is characterized as having a relatively low risk of aircraft-related hazards.

The proposed project consists of modernization of an existing school facility and would not introduce a new use or intensify occupancy beyond what is currently allowed. Because the project would maintain the existing land use and does not involve a substantial change in use or density, it is exempt from Airport Land Use Commission (ALUC) review. In addition, public schools are not identified as a prohibited land use within Zone 6 of the ALUCP (Fresno Council of Governments, 2018). Therefore, the project would not expose people to a substantial airport-related safety hazard.

With respect to noise, the project site is located just outside the 60 dBA community noise equivalent level (CNEL) contour for Fresno Yosemite International Airport. As a result, exterior noise levels at the site are below 60 CNEL and would remain so with project implementation. Typical building construction would provide an approximate 10 to 15 dBA CNEL reduction in interior noise levels, resulting in interior levels of approximately 45 to 50 dBA CNEL. This range is generally considered acceptable for classroom environments (Fresno Council of Governments, 2018).

Therefore, the project would not result in excessive noise exposure or airport-related safety hazards, and impacts would be **less than significant.**

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

Less than Significant Impact

Construction may temporarily alter evacuation routes for the Norseman Elementary School campus. Norseman school administrators would alter the school's safety plan to account for temporary construction conditions. Additionally, the school would be completely reconstructed and would require an updated school safety plan. School administrators would ensure that the school's safety plan is updated to account for the updated layout.

The project may temporarily interfere with traffic on surrounding roads during construction. Specifically, during construction of driveways and utilities. The project would comply with City of Fresno road construction requirements to minimize the impact to traffic and therefore minimize impact to evacuation routes. The project would have a **less than significant impact.**

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

No Impact

As discussed in section E.20 – *Wildfire*, the project site is not located in a State Responsibility Area or in an area identified as having a Fire Hazard Severity Zone (Cal-Fire, 2025). The nearest wildfire severity zones is located approximately 6.5 miles to the north, and the nearest State Responsibility Area is located approximately 8.75 miles to the northeast. The project would have **no impact.**

10. Hydrology and Water Quality

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?			X	
b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?			X	
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:	-	-	-	-
(i) result in substantial erosion or siltation on- or off-site;			X	
(ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?			X	
(iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional resources of polluted runoff; or			X	
(iv) impede or redirect flood flows?			X	
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?			X	
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?			X	

Environmental Setting

Existing and Future Conditions

Hydrology

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

Stormwater or non-stormwater runoff that enters the public storm drainage system is directed to the stormwater retention basin, Basin "JJ," located to the west of the project. This basin has a relief line to Mill Ditch Canal which is hydrologically connected to Waters of the US (WOTUS).

Groundwater

The project site is within the Kings Subbasin. Groundwater depth can be estimated using data from the California Department of Water Resources' California's Groundwater Live website. A well approximately 7.4 miles east (Site Code: 367717N1196088W001) last measured a depth to groundwater of 62.80 feet on September 30, 2025 (California Department of Water Resources, 2025). According to the North Kings Groundwater Sustainability Agency 2024 Annual Report, the project site is located downgradient from this monitoring well and the groundwater levels are approximately 110 ft deeper, according to groundwater level contour maps provided in the report (Kings Subbasin Groundwater Sustainability Agencies , 2024). The groundwater at the site can therefore be estimated to be approximately 173 ft below ground surface.

Federal Regulations

Clean Water Act

The Clean Water Act (CWA) was passed in 1972 to restore and maintain the chemical, physical, and biological integrity of the nation's water, or Water of the United States (WOTUS). Its initial programming focused on permitting point discharges of pollutants from industrial sources and wastewater generators such as municipalities. This permitting system is called the National Pollutant Discharge Elimination System Program (NPDES Program). The CWA was amended in 1987 to regulate point and non-point stormwater discharges to the WOTUS. The 1987 amendment included permitting requirements for construction stormwater discharges, industrial stormwater discharges, and municipal stormwater discharges for municipalities with populations of 10,000 residents or greater. Additionally, Section 303 of the CWA requires states to continually develop lists of impaired water bodies and to develop Total Maximum Daily Loads (TMDLs) for these waterbodies. TMDLs account for all pollutant sources, including natural sources.

The nearest water body that the project would impact would be stormwater retention basin, Basin "JJ." The basin is not subject to any TMDLs (Central Valley Regional Water Quality Control Board, 2018).

National Pollutant Discharge Elimination System Program

The National Pollution Discharge Elimination System (NPDES) Program was established by Section 402 of the Clean Water Act and is the program by which permits are issued to dischargers to the WOTUS. The Federal Government, through the Environmental Protection Agency (EPA), issues these NPDES permits to specific dischargers or will issue general permits that similar dischargers may receive coverage. For example, the EPA issues a general permit for Industrial stormwater dischargers and a general permit for Construction stormwater dischargers. Additionally, the EPA issues permitting authority to States where a State may develop their individual or general permits. California is a State with this permitting authority and issues its own Industrial and Construction General Permits.

The project site would be required to seek coverage under the California-issued Construction General Permit as the project is hydrologically connected to Waters of the U.S. In regards to Municipal Separate Storm Sewer System (MS4) NPDES permitting, K-12 schools are not required to enroll in coverage under an MS4 permit at the time of this analysis. However, the project site would be required to abide by any requirements issued by the local MS4 Stormwater Quality Management Plan, which is primarily managed by the Fresno Metropolitan Flood Control District (FMFCD).

Federal Emergency Management Agency

The Federal Emergency Management Agency (FEMA) manages the National Flood Insurance Program (NFIP). The NFIP provides flood insurance to residents and property owners to help recover after a property has been flooded. NFIP assists communities with adopting and enforcing floodplain management policies to reduce potential flood damage; the NFIP was established by the National Flood Insurance Act of 1968. These floodplain management policies apply to Special Flood Hazard Areas (SFHAs), or high-risk flood areas, which are areas that have a 1% chance of being flooded any given year. To better assist communities, the NFIP prepares maps showing areas with high to low flood risk, including SFHAs.

According to the most recent available Flood Insurance Rate Map (FIRM), the southwest corner of the project is within Other Areas of Flood Hazard, specifically, 0.2% Annual Chance Flood Hazard area (500-year floodplain) This can be seen below in Figure 12. For context, a large portion of the project location in the City of Fresno is within a 0.2% Annual Chance Flood Hazard area. Figure 13 shows areas in the broader project location within flood hazard areas (Federal Emergency Management Agency, 2025).

FIGURE 10: PROJECT SITE FEMA FLOOD HAZARD MAP

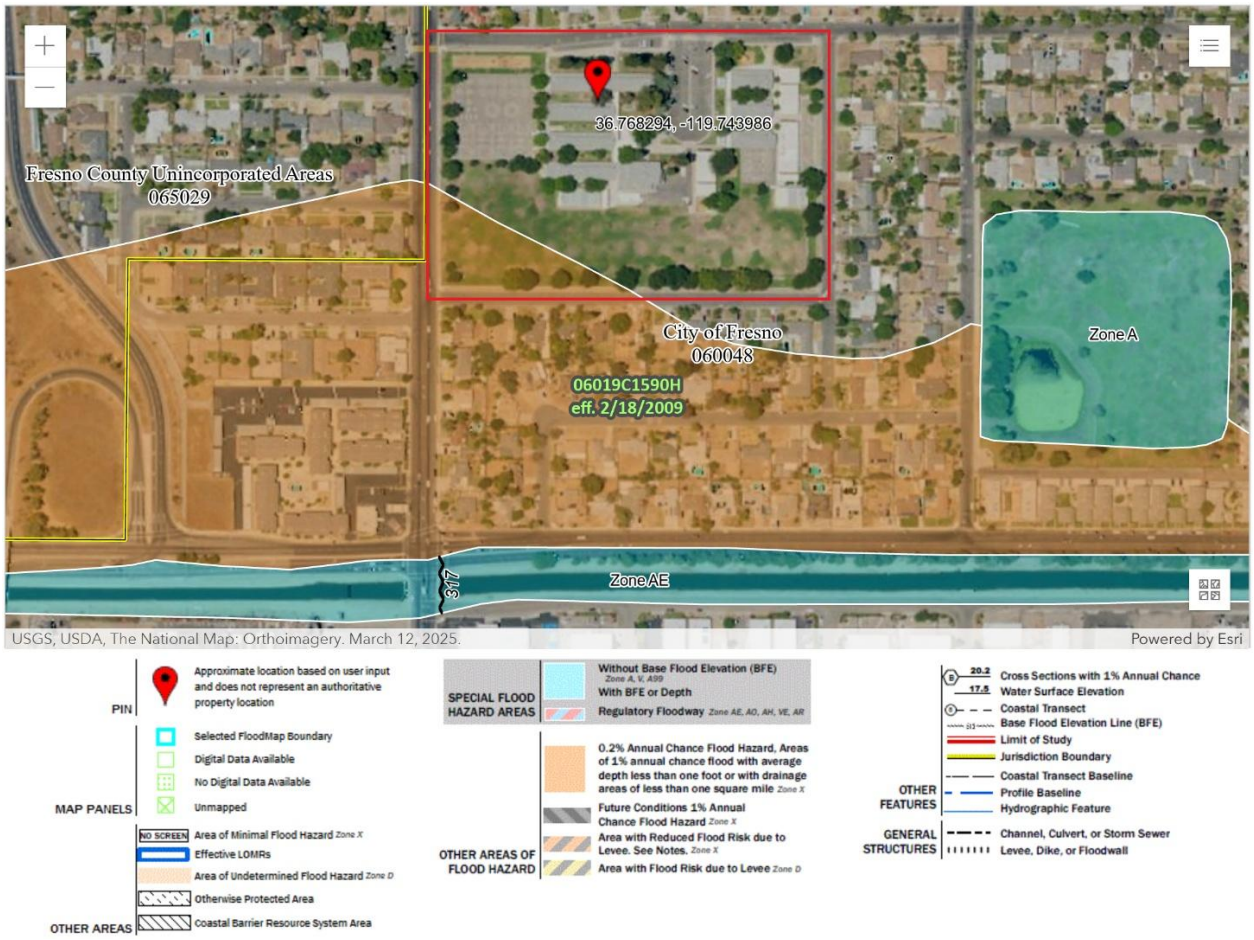


Figure 12: A map showing the project site with FEMA flood hazard data. The map shows the southwest corner of the project site within a 0.2% Annual Chance Flood Hazard area. A special flood hazard area due to the Mill Ditch spans east to west approximately 660 feet south of the south perimeter of the existing school. A special flood hazard area is also shown in Basin V Park, approximately 390 ft east of the east perimeter of the existing school.

FIGURE 11: PROJECT LOCATION FEMA FLOOD HAZARD MAP

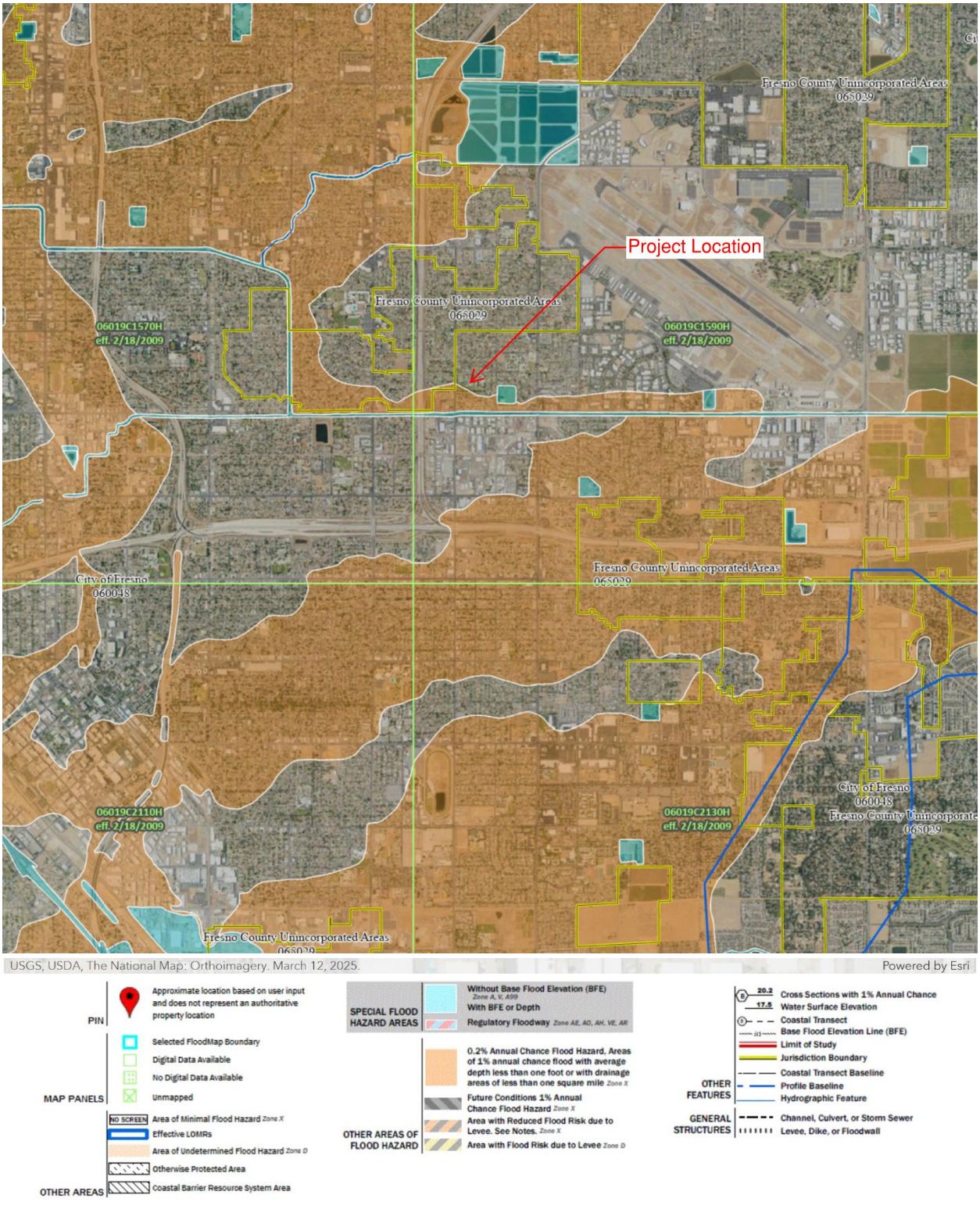


Figure 13: A map showing the project location with FEMA flood hazard data for a large area of Fresno. The map shows approximately half of the areas shown are within a 0.2% Annual Chance Flood Hazard area and small areas within a special flood hazard area.

State Regulations

Porter-Cologne Water Quality Act

The Porter-Cologne Water Quality Act was enacted in 1969 and created to regulate the water quality of California's surface waters, groundwaters, and wetlands. This Act established the nine Regional Water Quality Control Board and the single State Water Board. One task of the Regional Water Quality Control Boards (RWQCBs) is to establish Basin Plans, which are water quality objectives for waterbodies within their jurisdiction. Another task of the RWQCBs is to establish the CWA Section 303(d) lists of impaired water bodies.

Basin "JJ" does not have any listed 303(d) impairments (California Water Boards, 2025).

Sustainable Groundwater Management Act of 2014

The Sustainable Groundwater Management Act (SGMA) requires local agencies to form Groundwater Sustainability Agencies, or GSAs, to locally manage groundwater resources in high and medium-priority groundwater basins. The GSAs develop Groundwater Sustainability Plans (GSPs) to mitigate overdraft within 20 years. However, the State may intervene if the local GSAs have inadequate GSPs.

Per the Sustainable Groundwater Management Act (SGMA), the project is located in the North Kings Groundwater Sustainability Agency (GSA) area. This Basin is considered high priority and critically over-drafted (CA Dept. of Water Resources, 2025).

Would the project:

a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

Less than Significant Impact

The construction of the project would be subject to the California Construction General Permit (CGP), which is the general NPDES permit for construction stormwater discharges. The CGP requires projects to implement stormwater quality Best Management Practices (BMPs) to prevent or reduce stormwater pollution, which include erosion prevention BMPs, sediment control BMPs, non-stormwater discharge prevention BMPs, and waste and material management BMPs.

The project would also be subject to any stormwater quality management requirements issued by the local MS4 NPDES permittees, primarily FMFCD. These requirements would include requirements to implement construction stormwater best management practices (BMPs), prohibitions of unauthorized non-stormwater discharges (such as discharges of waste water to the public stormwater system), requirements to reduce pesticide and herbicide usage, and requirements to manage trash to prevent disposal of trash into stormwater systems. These requirements also include BMPs that would be implemented for various activities, such as landscape maintenance and facility maintenance (e.g., preventing wash water from flowing to the storm drain system, cleaning up grass clippings that have fallen into nearby streets, or reducing or eliminating irrigation runoff).

The project would prevent discharges of contaminants to groundwater by complying with local, State, and Federal regulations, as explained in Section E.9 – *Hazards and Hazardous Materials*.

Ultimately, any stormwater or accidental non-stormwater discharges from the site would enter the public stormwater drainage system, which would flow to Basin "JJ" which would provide water quality treatment. Additionally, Mill Ditch may be diverted to various groundwater recharge projects before reaching its terminus at any Waters of the U.S.

Considering that the project would implement stormwater BMPs during construction and operation, and considering that the project would implement FMFCD, State, and Federal requirements to prevent pollution to the stormwater drainage system and the groundwater aquifer, the project would have a **less than significant impact.**

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

Less than Significant Impact

The project receives its water from the City of Fresno. The City of Fresno receives its water from multiple sources, including groundwater sources. As the City of Fresno is a service provider and a member of the North Kings GSA, the project would abide by any water saving measures required by the City of Fresno to ensure a sustainable groundwater aquifer. Furthermore, the project would redevelop an existing campus, that would continue to operate using domestic water sources. The redesigned school would include more water efficient appliances and landscaping than the existing older school facility. The project would therefore have a **less than significant impact.**

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

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

Less than Significant Impact

As mentioned previously, the project would implement the requirements of the CGP including the requirement to reduce erosion and siltation. The project would have a **less than significant impact.**

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

Less than Significant Impact

The project is within the jurisdiction of the Fresno Metropolitan Flood Control District (FMFCD) and would discharge its runoff to the public storm drainage system owned and operated by FMFCD. FMFCD has master planned its stormwater drainage system and would require the project to comply with surface runoff rate and volume standards to prevent flooding onsite or offsite. The project would have a **less than significant impact.**

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

Less than Significant Impact

As mentioned previously, FMFCD has master planned its stormwater drainage system and would require that the project mitigate any exceedances in the project parcel's master planned runoff. FMFCD would review proposed site development plans to ensure they meet the Master Drainage Plan and stormwater design standards. The FMFCD would start by checking that all required documents are submitted, then conduct a technical review to confirm drainage capacity, proper integration with existing infrastructure, and compliance with NPDES water quality requirements. FMFCD would coordinate with local agencies, set conditions such as drainage fees or facility agreements, and grant approval once all requirements are satisfied. After construction, FMFCD will enforce post-development mitigation agreements. The project would have a **less than significant impact.**

iv. Impede or redirect flood flows?

Less than Significant Impact

The southwest corner of the project site is located within a 0.2% Annual Chance Flood Hazard area (500-year floodplain), however this area has no proposed improvements. The project would not alter site elevations within the designated 0.2% Annual Chance Flood Hazard area to impede or redirect flood flows during the low probability of a 500-year flood event. Therefore, there would be **a less than significant impact.**

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

Less than Significant Impact

The southwest corner of the project site is located within a 0.2% Annual Chance Flood Hazard area (500-year floodplain), however this area has no proposed improvements or site improvements, therefore there is no inundation risk and that could result in pollutant release during extreme flood events related to the project. The project is not located in a tsunami zone or seiche zone. Therefore, there would be **a less than significant impact.**

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

Less than Significant Impact

The project would not conflict with or obstruct the implementation of a water quality control plan or a sustainable groundwater management plan. The local water quality control plan would be the Tulare Lake Basin Water Quality Control Plan (Basin Plan) issued by the Central Valley Water Quality Control Board. The project would abide by the general guidance and requirements specified in the Basin Plan, such as preventing discharges of pollutants to receiving waters and the implementation of CGP requirements during construction (California Regional Water Quality Control Board - Central Valley Region, 2018). The project would abide by any requirements set by the North Kings GSP. The project's impact would be **less than significant.**

11. Land Use and Planning

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

Environmental Settings

The project site is zoned as Public and Institutional (PI) (City of Fresno, 2025). The project site is an existing elementary school campus. The project would not add new land uses to this project site.

Would the project:

a. Physically divide an established community?

No Impact

The project site would not add new land uses or expand beyond its property boundaries. Therefore, the project would not physically divide an established community. The project would have **no impact.**

b. Conflict with any land use plan, policy or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

No Impact

As the project would not add new land uses to the project site, the project would not conflict with any land use plan, policy or regulation, let alone regulations adopted for the purpose of avoiding or mitigating an environmental effect. The project would have **no impact.**

12. Mineral Resources

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

Environmental Settings

The State of California is required to encourage the conservation and protection of the state's mineral resources per the Surface Mining and Reclamation Act of 1975 (SMARA) (California Department of Conservation, 2025). The project site is located in the SMARA study area known as the Fresno Production-Consumption Region for Portland Cement Concrete aggregate, and the nearest aggregate mine is the Kings River Aggregates which is located approximately 14 miles to the east (California Department of Conservation, 2025). Oil is another mineral resource that has been extracted from the Central Valley floor, though the nearest active well is approximately 20 miles to the southwest (California Department of Conservation, 2025).

Would the project:

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

No Impact

The project site is not located over any known mineral resources. Additionally, the project site is an existing elementary school and surrounded by urban land uses. Mineral resources would not be extracted from this location. The project would have **no impact.**

b. Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

No Impact

The project site is not located in a delineated area for important mineral resource recovery. The project would have **no impact.**

13. Noise

Would the project result in:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?		X		
b. Generation of excessive groundborne vibration or groundborne noise levels?		X		
c. For a project located within a private airstrip or airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?			X	

Noise Background and Terminology

Sound can be defined as mechanical energy that propagates through the air and is caused by vibration or disturbance. Sound levels are usually measured in decibels (dB), which is the amplitude of a sound wave, or its intensity/energy. The frequency of a sound wave is measured in Hertz (Hz) and describes its pitch. Sound tends to attenuate, or reduce in amplitude, the farther away a noise receptor (e.g., a human being) is located from the sound. For every doubling of distance, sound amplitude is reduced by 6dB.

Humans may react negatively to a noise or vibration depending on how loud/intense a noise is, how close they are to the noise, how frequently the noise is experienced, and where exactly the noise is experienced. A fighter jet taking off at an airport may produce intense noise that can be harmful and cause hearing damage depending on how close a noise receptor is. Though the noise may be attenuated at farther distances to prevent hearing damage, fighter jet takeoffs may still be audibly loud. If fighter jet takeoffs occur frequently throughout the day, then the noise may interfere with comfort and concentration. Different noise receptors are more sensitive to noise than others, such as patients in a hospital, children in a classroom, and people in their homes, where disrupting comfort and concentration negatively affects these receptors. Furthermore, loud noises at night would impact sleep which is essential to good health. Noise is analyzed as an environmental impact to reduce a projects impacts on nearby sensitive receptors.

Groundborne Vibration Background and Terminology

Vibration is similar to noise in that it involves a source, a path through which energy travels, and a receiver. Although vibration is related to noise, the two differ in how they are transmitted. Noise is generally described as pressure waves moving through air, while vibration typically results from the excitation of a structure or surface. Like noise, vibration is characterized by both amplitude and frequency. How a person experiences vibration depends on individual sensitivity, as well as on the magnitude and frequency of the source and the response characteristics of the structure being affected.

Vibration can be quantified using measurements of acceleration, velocity, or displacement. When vibration is expressed in terms of velocity, it is reported as peak particle velocity, or PPV, measured in inches per second.

There are no federal, state, or local regulations that establish enforceable standards for groundborne vibration. However, Caltrans has developed vibration criteria that address the potential for structural damage and human annoyance. These recommended criteria are used to evaluate continuous vibration sources, such as vehicle traffic, eq and most construction activities, and are summarized in Table 5. The damage thresholds are based on the motion measured at building foundations and do not account for any additional amplification caused by structural components of the building.

As shown in Table 5, the vibration level at which continuous activities may pose a risk to typical structures is 0.3 inches per second PPV for older residential buildings and 0.5 inches per second PPV for newer construction. In terms of human perception, vibration becomes noticeable at approximately 0.04 inches per second PPV for continuous sources, while levels around 0.2 inches per second PPV are generally considered potentially annoying for occupants of buildings.

TABLE 5
SUMMARY OF GROUNDBORNE VIBRATION LEVELS AND POTENTIAL EFFECTS

Vibration Level (in/sec ppv)	Human Reaction	Effects on Buildings
0.006 - 0.019	Threshold of perception; possibility of intrusion	Vibrations unlikely to cause to damage of any type
0.08	Vibration readily perceptible	Recommended upper level of vibration to which ruins and ancient monuments should be subjected.
0.10	Level at which continuous vibrations begin to annoy people.	Virtually no risk of “architectural” damage to normal buildings.
0.20	Vibrations annoying to people in buildings (this agrees with the levels established for people standing on bridges and subject to relatively short periods of vibrations).	Threshold at which there is a risk of “architectural” damage to fragile buildings.
0.3 - 0.6	Vibrations become distinctly perceptible at 0.04 in/sec ppv and considered unpleasant by people subjected to continues vibrations and unacceptable to some people walking bridges.	Potential risk of “architectural” damage may occur at levels above 03 in/sec ppv for older residential structures and above 0.5 in/sec ppv for newer structures.
The vibration levels are based on peak particle velocity in the vertical direction for continuous vibration sources, which includes most construction activities. *Source:* (California Department of Transportation, 2013)		

Environmental Settings

Sensitive Receptors

Sensitive receptors generally include land uses such as schools, churches, hospitals, public libraries, and residences. The project site is itself a sensitive receptor as an elementary school that would still operate during and near construction activities. Additionally, there is a church approximately 500 feet northeast of the project site and the project site is surrounded by residential land uses approximately 50 feet away across public streets surrounding the project site.

Existing Noise Sources

Existing noise sources include traffic noise from surrounding public roads, children playing during recess and other recreational activities, landscaping equipment (lawn mowers, weed whackers, and leaf blowers), and stationary sources from mechanical equipment (heating air conditioning and ventilation).

Existing Groundborne Vibration Sources

There are no significant existing groundborne vibration sources at the project site. Existing minor groundborne vibration sources include on-site mechanical equipment and off- and on-site traffic.

Local Noise Regulations

City of Fresno

The City of Fresno's Code of Ordinance, Chapter 10, Article 1 – Noise Regulations, states the noise level requirements throughout the City (City of Fresno, 2025). Specifically, Section 10-109. Exceptions states that:

> "Construction, repair or remodeling work accomplished pursuant to a building, electrical, plumbing, mechanical, or other construction permit issued by the city or other governmental agency, or to site preparation and grading, provided such work takes place between the hours of 7:00 a.m. and 10:00 p.m. on any day except Sunday"

Would the project result in:

a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Less than Significant Impact with Mitigation Incorporated

Operations

Operation of the project would not result in increases in ambient noise as this project's land use will remain the same and there would be no equipment or features that would produce an increase in operational noise levels. Operational noise impacts would be less than significant.

Construction

Noise levels associated with common construction equipment at 50 feet distance are presented in Table 6. Graders and Excavators are expected to be used during construction, so the maximum exterior noise level of construction activity at 50 feet would be expected to be 85 dB during the most noise-intensive construction activities.

TABLE 6: NOISE LEVELS ASSOCIATED WITH COMMON CONSTRUCTION EQUIPMENT

Equipment Type	Maximum Noise Level at 50 feet (dB)
Backhoes	80
Compactor (ground)	80
Cranes	85
Dozers	85
Dump Trucks	84
Excavators	85
Flat Bed Trucks	84
Front-end Loaders	80
Graders	85
Impact Pile Drivers	95
Jackhammers	85
Pick-up Truck	55
Pneumatic Tools	85
Pumps	77
Rock Drills	85
Rollers	85
Scrapers	85
Tractors	84

Source: (Federal Highway Administration, 2017)

The project would result in a temporary increase in ambient noise during construction. However, construction would occur between the hours of 7 am and 10 pm (likely to stop construction before 6 pm) on Mondays through Fridays, abiding by the City of Fresno construction noise ordinance and minimizing the impact of noise on nearby residential and church sensitive receptors.

On-site school buildings and congregation areas would be within 50 feet of active construction areas and therefore represent the closest sensitive receptor. Construction equipment expected to be used includes graders, excavators, and jackhammers, which are among the higher-noise construction equipment types. Based on published reference noise levels for this equipment, maximum exterior noise levels at a distance of 50 feet are conservatively estimated to be approximately 85 dBA for outdoor receptors during peak construction activity. Indoor noise levels would be reduced by building wall materials, windows, and doors. A conservative interior noise attenuation of approximately 15 dBA is assumed for occupied buildings, yielding an estimated maximum indoor noise level of approximately 70 dBA for inside school buildings.

Reconstruction of the school campus would occur while school is in session and would involve demolition, construction, and use of construction equipment that would generate elevated noise levels. These temporary noise levels could intermittently interfere with classroom instruction, student concentration, and faculty activities during periods of high-noise construction. In addition, residential properties near the project site would be exposed to elevated construction noise levels during daytime hours. Although construction noise is exempt from City noise standards when conducted during allowable hours, the proximity of sensitive educational uses and nearby residences increases the potential for disturbance.

Without mitigation, construction noise associated with the project would result in short-term disruption of normal school operations and temporary annoyance to nearby residents. Implementation of construction noise control measures is therefore required to reduce impacts to the maximum extent feasible.

Mitigation Measure NOISE-1: Construction Noise Control and Compliance

1. **Noise Ordinance Compliance**
   The Contractor shall comply with all applicable local, city, county, state, and federal laws, ordinances, and regulations governing construction noise at all times. Construction activities shall be limited to allowable hours as specified by the City of Fresno noise ordinances.

2. **Construction Scheduling During School Hours**
   If school is in session during any phase of construction and, in the District's reasonable judgment, construction noise disrupts or interferes with classroom instruction or normal school operations, the Contractor shall, at the District's request, reschedule high-noise activities to occur outside normal instructional hours or implement alternative construction methods.

3. **Control of Radios and Nonessential Noise Sources**
   The use of radios, personal music devices, or other amplified sound sources at the construction site shall be controlled to ensure that sound is not audible beyond the immediate construction area. The District reserves the right to prohibit such devices at the site, except for communication radios necessary for construction safety and coordination.

4. **Equipment Mufflers and Maintenance**
   All construction equipment, including impact tools, shall be equipped with properly functioning intake and exhaust mufflers. Equipment shall be maintained in good working order to minimize excessive noise, vibration, and rattling.

5. **Coordination and Response to Noise Complaints**
   The Contractor shall cooperate with the District to minimize or temporarily suspend the use of particularly noisy or vibratory equipment if such equipment becomes objectionable due to its duration, intensity, or timing. Reasonable adjustments shall be made to construction sequencing or methods to reduce disruption.

6. **Advance Notice of High-Noise Activities**
   The Contractor shall provide the District with written notice at least 48 hours in advance of particularly noisy construction activities, including but not limited to pneumatic demolition, concrete saw cutting, or other high-impact operations. The District may coordinate notifications to staff, students, and nearby residents as appropriate.

7. **Construction Equipment and Material Siting**
   All operating diesel generators shall be located a minimum of 100 feet from any on-site occupied building and from nearby residential property lines, to the extent feasible. Where site constraints prevent full compliance, generators shall be placed at the maximum feasible distance and oriented to direct noise away from occupied buildings and neighboring properties.

Construction equipment, staging areas, and construction materials that require the use or movement of powered equipment for loading, unloading, or repositioning shall not be stored or staged within 100 feet of on-site occupied buildings or adjacent property lines, to the extent feasible. Equipment and material storage locations shall be sited to minimize noise exposure to students, staff, and nearby residential receptors.

Through the implementation of Mitigation Measure NOISE-1, temporary and intermittent noise impacts would be **less than significant with mitigation incorporated**.

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

Less than Significant Impact with Mitigation Incorporated

Project construction is expected to produce groundborne vibration from the use of construction equipment. However, there are no high vibration generating construction activities that would occur near buildings, such as jack hammering or pile driving, therefore vibration is not expected to cause damage to nearby structures. Annoyance and impacts to humans from groundborne vibrations would also be mitigated by the implementation of Mitigation Measure NOISE-1 to schedule loud/high vibratory construction activities outside of student occupation of nearby buildings. Therefore, the project would have a **less than significant impact with mitigation incorporated.**

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

Less than Significant Impact

The project is within the Airport Influence Area of the Fresno Yosemite International Airport but would not be subject to review by the Airport Land Use Commission as the project would retain the existing land use. However, the Fresno Council of Governments have prepared the Fresno County Airport Land Use Compatibility Plan that includes criteria for noise reduction in development projects. These noise reduction requirements apply to projects with a Community Noise Equivalent Level (CNEL) of 60 dBA or greater. Exhibit D2 – Future Noise Contours of Appendix D of the Airport Land Use Compatibility Plan shows noise contours delineating long-term noise levels around the airport (Fresno Council of Governments, 2018). The project site is located outside of the 60 dBA CNEL noise level contour, therefore, the project would experience exterior noise levels less than 60 dBA CNEL from the airport's operations, and 45-50 dBA CNEL interior noise levels due to building material noise attenuation, which is within the acceptable noise level range for educational buildings. Therefore project would have a **less than significant impact.**

14. Population and Housing

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

Would the project:

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

No Impact

The project would not directly or indirectly induce unplanned population growth as the project would not involve the construction of new housing or businesses, nor would the project involve the extension of infrastructure. The project would have **no impact.**

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

No Impact

The project's footprint is within an existing elementary school campus and would therefore not displace any people or housing. The project would have **no impact.**

15. Public Services

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities or need for new or physically altered government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:	-	-	-	-
(i) Fire Protection?				X
(ii) Police Protection?				X
(iii) Schools?				X
(iv) Parks?				X
(v) Other public facilities?				X

a. Would the project result in substantial adverse physical impacts associated with the provision of new or altered governmental facilities, need for new or altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the following public services: fire protection, police protection, schools, parks, and other public facilities?

The following Public Services are available to the project site and would not be impacted by the project:

Fire Protection: Fire protection is provided by the City of Fresno Fire Department which currently serves the project site. The project would design facilities in accordance with Fresno Fire Department and Division of State Architects (DSA) standards, which would improve the existing facilities with up-to-date design that reduces the fire hazard at the project site. The project would have **no impact.**

Police Protection: Police protection is provided by the City of Fresno Police Department which currently serves the project site. Additionally, the District ensures that Student Resource Officers are able to assist with law enforcement on school campuses. The project would have **no impact.**

Schools: The project would modernize the existing campus ensuring higher quality facilities for the Norseman Elementary School area. The project would have **no impact.**

Parks: The project would provide improved recreational facilities for students and community members. The project would have **no impact.**

Other Public Facilities: All other services that are currently provided to the elementary school would continue to be provided. The project would have **no impact.**

16. Recreation

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

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

No Impact

The project would include improvements to onsite recreational facilities. The project would have **no impact.**

b. Does the project include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?

Less than Significant Impact

The project involves the modernization of existing recreational facilities. Any such impacts caused by the project would be analyzed and addressed by this document. The project would have a **less than significant impact.**

17. Transportation

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

Environmental Setting

Existing Transportation Conditions

The project is located at the existing Norseman Elementary School campus at 4636 East Weldon Avenue in the City of Fresno. The approximately 12.4-acre campus occupies a block bounded by North Maple Avenue to the west, East Weldon Avenue to the north, North Woodrow Avenue to the east, and East University Avenue to the south. North Maple Avenue is designated as a collector roadway by the City of Fresno, while Weldon Avenue, Woodrow Avenue, and University Avenue function as local residential streets (City of Fresno, 2022).

Sidewalks are generally present around the perimeter of the campus, with marked crosswalks and school-related traffic calming features located near primary student access points. In addition, Class II bicycle lanes are provided along North Maple Avenue, which serves as a primary north-south bicycle route within the attendance area.

Fresno Area Express (FAX) provides regional transit service in the vicinity of the project site, with the nearest transit stop located approximately 0.25 mile north of the campus along East Clinton Avenue.

Physical Safe Route to School Analysis

A Physical Safe Routes to School (SRTS) Analysis was prepared by Blair, Church & Flynn Consulting Engineers for the project at the request of the City of Fresno and is included in Appendix D. The analysis was prepared to document existing pedestrian and bicycle conditions within the Norseman Elementary School attendance boundary and to support the evaluation of transportation safety impacts under the California Environmental Quality Act (CEQA).

The study evaluated the physical transportation network used by students traveling to and from the campus, including roadway classifications, sidewalk connectivity, crosswalk locations, bicycle facilities, posted speed limits, and barriers to pedestrian and bicycle travel. The analysis also examined the influence of major transportation and physical barriers within the attendance area, including State Route (SR) 168, the Mill Ditch, and the Union Pacific rail corridor along Floradora Avenue, which affect connectivity and route directness for some students. Field observations and mapping were used to assess the continuity and accessibility of pedestrian and bicycle routes throughout the approximately 1.14-square-mile attendance boundary.

The findings indicate that pedestrian and bicycle facilities are generally well developed in the vicinity of the school and along primary travel corridors, although gaps in sidewalks, crosswalks, and bicycle infrastructure are present in portions of the attendance area, particularly within county jurisdiction and south of McKinley Avenue. The SRTS Analysis establishes the baseline transportation safety conditions used to evaluate project-related effects on pedestrian and bicycle travel.

Regulatory Setting – Local Transportation Plans

County of Fresno

The 2022 Fresno County Regional Transportation Plan & Sustainable Communities Strategy (Fresno RTP) was also developed by the Fresno Council of Governments and approved on July 28, 2022. The Fresno RTP describes current and proposed public transportation projects to keep the residents of the County connected. The Fresno RTP/SCS is generalized and does not reference goals that pertain to school districts (Fresno Council of Governments, 2022).

The Fresno Council of Governments has prepared a VMT Analysis guide to assist project proponents with determining the VMT impact of a project.

The Fresno Council of Governments prepared the Fresno County Regional Long-Range Transit Plan in 2019 with the intended goal to guide transit services in Fresno County through 2050. The Long Range Transit Plan does not mention the project site (Fresno Council of Governments, 2019).

City of Fresno

The City of Fresno prepared an Active Transportation Plan in 2016 which outlines the City's vision for active transportation within its jurisdiction. The City of Fresno has planned Class II bike lanes on North Maple Avenue and East Weldon Avenue adjacent to the school, where the bike lane on North Maple Avenue is a priority (City of Fresno, 2016). It should be noted that the bike lanes along North Maple Avenue have been built out as of November 2025.

The Fresno Area Express, the City of Fresno's transportation authority, has prepared the Fresno-Clovis Metropolitan Area (FCMA) Short Range Transit Plan (SRTP) in 2025 which provides the area's 5-year plan for transit services. The SRTP does not mention the project site or its surrounding streets (Fresno Area Express, 2025).

As of July 2026, the City of Fresno does not have an adopted VMT guidance.

Would the project:

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

Less than Significant Impact with Mitigation Incorporated

Construction

Project construction may enter the public right-of-way for roadway, sidewalk improvements or utility connections which would temporarily interfere with the flow of traffic, however, this impact would be temporary and construction would abide by any traffic control requirements through the discretionary review of an encroachment permit application to the City of Fresno for lane closures, should a lane closure be necessary. The implementation of a traffic control plan approved by the City of Fresno would minimize the impact of construction on general traffic flow.

Operation

The project consists of modernization and reconstruction of Norseman Elementary School and would not increase student enrollment or operational capacity. A Physical Safe Routes to School (SRTS) Analysis prepared for the project evaluated existing pedestrian, bicycle, and roadway conditions within the Norseman Elementary School attendance boundary, as well as the project's effects on transportation safety and circulation. The analysis found that the project would slightly alter existing pedestrian and bicycle access patterns and continue to utilize the existing surrounding circulation network. The primary student entrance along Weldon Avenue would remain in place, and the existing bus drop-off location would remain unchanged.

The project would modify on-site circulation through reconstruction of the northeast parking lot, implementation of a one-way parent drop-off loop, and construction of a new staff parking lot along University Avenue. These improvements would improve traffic organization, reduce vehicle congestion and turning movements at the primary school frontage, remove on-street parking adjacent to the campus on Weldon Avenue, and reduce potential conflicts between vehicles, pedestrians, and bicyclists. Existing sidewalks, crosswalks, bicycle facilities, school warning signage, and traffic-calming features would remain in place and continue to serve students traveling to and from the campus.

The project is not near any transit facilities and the project would not make any improvements in or near the existing Class II bike lane along Maple Avenue.

Although the project would modify site access and circulation patterns, the conceptual design has not been finalized. Therefore, final driveway locations, circulation features, and associated traffic-control improvements would be reviewed through coordination with the City of Fresno pursuant to Mitigation Measure TRAN-1. This measure requires consultation with the City of Fresno Public Works/Traffic Engineering Division and implementation of any reasonable transportation safety improvements necessary to maintain safe pedestrian, bicycle, and vehicle circulation consistent with applicable City standards and policies.

Mitigation Measure TR-1: Traffic Engineering Consultation with City of Fresno
To ensure safe vehicular, bicycle, and pedestrian access following project implementation, the design build entity shall coordinate directly with the City of Fresno Public Works/Traffic Engineering Division during the project design phase to review and refine the proposed parking lot layout, drive approach

locations, internal site circulation, and transportation safety features associated with the reconstructed campus.

This coordination shall include one or more meetings during the design process and shall result in documented concurrence from the City of Fresno regarding the location and design of access points, circulation patterns, and reasonable on site or off site transportation safety improvements prior to submittal of encroachment permit applications.

As a condition of project approval, the project applicant shall identify and implement all reasonable transportation safety improvements required by the City of Fresno to maintain safety and operational efficiency within the public right of way as a result of the project. Required improvements shall be based on applicable City of Fresno standards, adopted policies, and site specific safety considerations, and shall be limited to measures reasonably related to project effects. Such improvements may include, but are not limited to, installation or modification of traffic control signage, pavement striping, marked crosswalks, drive approach improvements, traffic calming features, bicycle or pedestrian facility enhancements, or comparable safety measures.

All required transportation safety improvements shall be fully constructed and operational prior to occupancy of the reconstructed school, unless an alternative timing is approved in writing by the City of Fresno.

With implementation of Mitigation Measure TRAN-1, the project would maintain consistency with applicable circulation plans, policies, and programs addressing roadway, pedestrian, bicycle, and transit facilities, and would not result in a substantial conflict with the circulation system. Therefore, impacts would be **less than significant with mitigation incorporated**.

b. Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

Less than Significant Impact

As mentioned in the Project Description, the project would not increase student enrollment or student capacity. Therefore, the project would not result in an increase in VMT. The project would have a **less than significant impact.**

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

Less than Significant Impact

The project would make improvements around its perimeter. Improvements to the road would include new driveways and a bus lane. Any improvements to City roads would abide by City of Fresno requirements which include traffic safety design requirements during off-site plan review and the issuance of an encroachment permit. The project would not result in incompatible uses with City streets. The project would have a **less than significant impact.**

d. Result in inadequate emergency access?

Less than Significant Impact

Construction work around the project site perimeter may temporarily result in a lane closures on those streets. However, the project would not close any lanes without approval from the City of Fresno.

Specifically, the City of Fresno's general notes for street plans requires that "one (1) 12-foot driving lane must be maintained in each direction at all times." And that "no public street shall be closed without prior approval" (Public Works Department, City of Fresno, 2021). Any road closures or roadway construction would be publicly available information that first responders can access (City of Fresno, 2025). Regardless, roadway construction would occur along small segments on the surrounding roads. Emergency response personnel would still be able to access the site during construction. It should be noted that the project would not permanently result in inadequate emergency access as the project design would abide by State safety standards as it is a public school. The project would have a **less than significant impact.**

18. Tribal Cultural Resources

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

A Sacred Lands Search File (SLFS) was completed and received from the Native American Heritage Commission (NAHC) on November 6, 2025. The results of the search were negative. On November 14, 2025, the District notified all California Native American tribe traditionally and culturally affiliated with the Project area with a summary of the proposed project via certified mail. No responses have been received at the time of publication of this Draft IS/MND. A compilation of the *Sacred Lands Files* search results, tribal notification letters, and a correspondence tracking sheet are included in Appendix E.

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

(i) Rupture Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?

Less than Significant Impact

There are no identified tribal cultural resources at the project site. There were no comments received from California Native American Tribes traditionally and culturally affiliated with the project location. There are no listed or eligible sites for listing in the California Register of Historical Resources or in a local register of historical resources. The Project would result in a **less than significant impact.**

(ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section

5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

Less than Significant Impact with Mitigation Incorporated

There are no identified tribal cultural resources at the project site and no comments received from California Native American Tribes traditionally and culturally affiliated with the project location. Despite there being no evidence of tribal cultural resources at the project site, there still remains the potential for inadvertent discoveries of tribal cultural resources during excavation activities. Therefore, mitigation measure TC-1 would be incorporated into the project.

TC-1: Unanticipated Discovery of Tribal Cultural Resources

If an inadvertent discovery is made and the qualified archaeologist (retained under Mitigation Measure CULT-1) determines or suspects that the find is of Native American origin, the District shall immediately notify all California Native American tribes traditionally and culturally affiliated with the project area that requested notification under AB 52.

Upon such notification:

1. Work Halt and Protection
   All work within 50 feet of the discovery shall halt. The discovery shall be protected with temporary fencing, flagging, or other measures appropriate to avoid further disturbance.
2. Tribal Notification and Coordination
   The District shall promptly contact tribes to provide:
   - A description of the discovery
   - Photographic documentation (as appropriate)
   - The archaeologist's initial assessment

   Tribes shall be given a reasonable opportunity to visit the site, if requested.
3. Consultation on Treatment
   The District, the qualified archaeologist, and interested tribes shall engage in consultation to develop culturally appropriate treatment measures, which may include:
   - Avoidance or preservation in place (preferred)
   - Controlled excavation/data recovery
   - Reburying materials in consultation with tribal representatives
   - Development of a Tribal Cultural Resource Treatment Plan
   - Recommendations shall be documented in writing.
4. Resumption of Work
   Construction within the discovery area shall not resume until:
   - The treatment measures have been completed to the satisfaction of the District and consulting tribes, and
   - The qualified archaeologist confirms that no additional resources are at risk.
5. Confidentiality
   The location and nature of any Tribal Cultural Resource shall remain confidential in accordance with Public Resources Code §21082.3(c) and shall not be disclosed to the public.

Implementation of this measure would ensure that any inadvertent discovery of Tribal Cultural Resources is treated respectfully and in consultation with tribes, reducing potential impacts to a **less than significant level with mitigation incorporated**.

19. Utilities and Service Systems

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction of which could cause significant environmental effects?			X	
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?				X
c. Result in determination by the wastewater treatment provider, which serves or may serve the project, that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?				X
d. Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?				X
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?				X

Existing Utilities and Systems

Water and Wastewater:

Water and sewer utilities are currently provided by the City of Fresno Department of Utilities. The City of Fresno receives its water from multiple sources, including groundwater sources. Wastewater from the project site is conveyed to and treated at the Fresno-Clovis Regional Wastewater Treatment Facility.

Solid Waste:

Solid waste generated from the project site is currently collected by the City of Fresno and is transported to the Cedar Avenue Recycling and Transfer Stations, and then to the regional landfill, the American Avenue Disposal Site.

Stormwater Drainage:

Stormwater generated from the project site is collected and conveyed by the special district, Fresno Metropolitan Flood Control District (FMFCD). Stormwater collected from the project site is directed to the stormwater retention basin, Basin "JJ," located to the west of the project.

Electrical and Natural Gas:

Electrical power and natural gas are currently provided by Pacific Gas & Electric Company.

Telecommunications:

Telecommunication service is currently provided by American Telephone & Telegraph Company (AT&T), as well as several wireless telecommunications companies.

Project Utilities

The project would continue to be served by City of Fresno for water, sewer, and solid waste, FMFCD for stormwater disposal, and PG&E for electrical power. The project would reconstruct an existing school campus and continue to be served by the same utility providers.

Would the project:

a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Less than Significant Impact

Water and Wastewater:
The project would continue to be served by City of Fresno water and sewer public utilities. The proposed reconfigured campus may result in relocated service connections, which would be reviewed and approved by the City of Fresno. Existing service connections that would stay in place would also be reviewed and approved by the City of Fresno to ensure that service connections are constructed to City of Fresno standards.

Stormwater:
FMFCD would review proposed site development plans to ensure they meet the Master Drainage Plan and stormwater design standards, ensuring stormwater capacity for the redesigned campus.

Electrical
Electrical energy would be provided by Pacific Gas and Electric Company (PG&E). Electrical service to the project site is currently delivered via overhead electrical power lines located along Maple Avenue and Weldon Avenue, which connect to the campus through underground service connections.

The redeveloped campus would continue to be served by these existing overhead and underground electrical facilities. Because the project would not expand campus use, no expansion of electrical infrastructure would be required.

If undergrounding of existing electrical lines is required as a condition of project approval, any such relocation along Maple Avenue or Weldon Avenue would not occur within a sensitive environment. Additionally, no hazardous waste sites have been identified in the surrounding roadways pursuant to Government Code Section 65925.5; therefore, such relocation would not result in a significant environmental effect.

Natural Gas
Natural gas service would be provided by PG&E via existing underground distribution lines located within the public right-of-way. These lines currently supply the campus through underground service connections.

The redeveloped campus would continue to be served by existing natural gas infrastructure. As the project would not increase campus use, expansion of natural gas facilities would not be necessary.

Any required new or modified natural gas connections would tie into existing underground natural gas lines within the surrounding right-of-way.

Telecommunications

Telecommunications services are currently provided via infrastructure co-located with overhead electrical facilities along Maple Avenue and Weldon Avenue, with connections routed underground into the campus.

The redeveloped campus would continue to be served by existing telecommunications infrastructure, and no expansion of off-site facilities would be required.

If undergrounding of telecommunications lines is required as a condition of approval, such work along Maple Avenue or Weldon Avenue would not occur within a sensitive environment. Furthermore, no hazardous materials sites have been identified in these areas pursuant to Section 65925.5; therefore, undergrounding would not result in a significant environmental effect.

As discussed above, the project would result in a **less than significant impact.**

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

No impact

The project site would continue to be served by the City of Fresno for potable water. The redeveloped campus would implement water efficient landscaping, appliances, and fixtures that would result in greater water efficiency than the existing campus. There would be **no impact.**

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

No impact

The project site would continue to be served by the City of Fresno for wastewater disposal. The redeveloped campus would implement water efficient appliances and fixtures that would result in greater water efficiency, which would also result in less wastewater output compared to the existing campus. There would be **no impact.**

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

No Impact

Solid waste disposal would continue to be provided by the City of Fresno. Redesigned solid waste container collection areas would comply with City of Fresno solid waste requirements.

The District would implement California SB 1383, which requires labeled waste containers trash, recyclables, and organic waste in all areas and donate excess edible food from cafeteria services that would otherwise be discarded to a food recovery organization. There would be **no impact.**

20. Wildfire

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

Wildfire Hazard

According to the Fire Hazard Severity Zones map provided by Cal Fire, the project site is not located in a State Responsibility Area or in an area identified as having a Fire Hazard Severity Zone (Cal-Fire, 2025). The nearest wildfire severity zones is located approximately 6.5 miles to the north, and the nearest State Responsibility Area is located approximately 8.75 miles to the northeast.

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

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

No Impact

The project is not located in or near state responsibility areas or lands classified as very high hazard severity zones. Therefore, the project would have **no impact.**

b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

No Impact

The project is not located near any wildfire hazard severity zones or any factors that could exacerbate wildfire risks. Therefore, the project would have **no impact**

c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

No Impact

The project would not require the installation or maintenance of any infrastructure that may exacerbate fire risk or result in ongoing impacts to the environment. Therefore, the project would have no impact

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

No Impact

The project is not at risk of wildfire, nor is it located near any wildfire hazard areas such that it would be at risk of any downstream/downslope effects after wildfires. Therefore, the project would have **no impact.**

21. Mandatory Findings of Significance

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

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

Less than Significant Impact

As discussed in Section E.4, *Biological Resources*, the project site consists of an existing developed and maintained elementary school campus and does not support sensitive natural communities, special-status plant species, or substantial wildlife habitat. Construction activities would occur primarily within previously disturbed areas. The project has the potential to affect nesting birds protected under State and federal regulations during vegetation removal activities; however, implementation of Mitigation Measure BR-1 would reduce these impacts to a less than significant level.

As discussed in Section E.5, *Cultural Resources*, no historical resources eligible for listing on the California Register of Historical Resources were identified on the project site. Therefore, the project would not cause a substantial adverse change in the significance of a historical resource. Although there is a low to moderate potential for deeply buried archaeological resources below approximately three feet in depth, implementation of Mitigation Measure CULT-1 would ensure that any previously undiscovered archaeological resources are identified, evaluated, and appropriately managed. In addition, while the likelihood of encountering human remains is low, compliance with Mitigation Measure CULT-2 and applicable State regulations would reduce potential impacts to a less than significant level.

When considered in combination with past, present, and reasonably foreseeable future projects in the area, the project's incremental contribution to impacts on biological, historical, archaeological, and

paleontological resources would not be cumulatively considerable. The project would occur on a previously developed school campus, would not remove substantial habitat or sensitive biological communities, and would not adversely affect known historical resources. Furthermore, implementation of Mitigation Measures BR-1, CULT-1, and CULT-2 would ensure that any previously undiscovered biological or cultural resources are protected in accordance with applicable regulations. Therefore, the project would not have the potential to substantially degrade the quality of the environment, substantially reduce habitat, threaten a plant or animal community, reduce the number or restrict the range of rare or endangered species, or eliminate important examples of California history or prehistory. Cumulative impacts would be **less than significant**.

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

Less than Significant Impact

Fresno Unified School District (District) has completed, is currently implementing, and would continue to implement school facility improvement and modernization projects throughout its service area. Because the District's attendance boundaries are largely built out and constrained by surrounding school districts, enrollment growth generally does not necessitate the construction of new school campuses. Instead, the District primarily focuses on modernization, replacement, and redevelopment of existing educational facilities. The proposed Norseman Elementary School Modernization Project is consistent with the type of facility redevelopment projects routinely undertaken by the District, although the scope of modernization is larger than that of some typical campus improvement projects.

School redevelopment projects of similar size and nature have the potential to contribute to cumulative impacts related to air quality, biological resources, cultural resources, greenhouse gas (GHG) emissions, hazards and hazardous materials, noise, transportation, and tribal cultural resources. Accordingly, these resource areas have been evaluated for their potential cumulative contribution.

As discussed throughout this Initial Study, potentially significant project impacts related to biological resources, cultural resources, geologic resources (paleontological resources), greenhouse gas emissions, noise, transportation, and tribal cultural resources would be reduced to a less than significant level through implementation of the identified mitigation measures. Because the project's incremental contribution to cumulative impacts would be reduced to a less-than-significant level, the project would not make a cumulatively considerable contribution to regional environmental impacts.

Potential impacts to biological resources, cultural resources, paleontological resources, and tribal cultural resources would primarily be associated with the inadvertent discovery of previously unknown resources during construction activities. Such resources, if encountered, would be site-specific in nature. Implementation of the identified mitigation measures would ensure that any discoveries are appropriately evaluated and managed in accordance with applicable regulations. As a result, the project's contribution to cumulative impacts on these resource types would not be cumulatively considerable.

Air quality and greenhouse gas emissions are inherently cumulative environmental issues because emissions from individual projects combine with emissions generated by other existing and future activities throughout the region and beyond. Construction and operation of the project would comply

with applicable San Joaquin Valley Air Pollution Control District (SJVAPCD) regulations, policies, and significance thresholds, which are designed to account for regional air quality conditions. The project's air quality impacts would be less than significant under these adopted methodologies.

Similarly, greenhouse gas emissions generated by the project would be reduced through compliance with applicable State regulations, including the California Building Standards Code, and implementation of MM GHG-1. These requirements would ensure that the project is designed and constructed consistent with State goals and policies for reducing greenhouse gas emissions. Consequently, the project's contribution to cumulative greenhouse gas impacts would not be cumulatively considerable.

Construction activities would temporarily generate elevated noise levels. However, implementation of MM NOISE-1 would reduce construction noise impacts to a less-than-significant level. Because the noise effects would be temporary and localized, and because the project's contribution would not be significant following mitigation, the project would not make a cumulatively considerable contribution to regional noise impacts.

Hazards and hazardous materials impacts would be less than significant. Site investigations conducted for the project did not identify contaminated soils requiring remediation or additional investigation. Although asbestos-containing materials and lead-based paint are present within existing campus buildings, these materials would be managed and disposed of in accordance with applicable federal, State, and local regulations. Compliance with these regulatory requirements would ensure that the project's contribution to cumulative hazards and hazardous materials impacts would be less than significant.

Potential impacts related to hydrology and water quality would also be less than significant. Construction and operation of the project would comply with applicable stormwater management requirements, including preparation and implementation of a Storm Water Pollution Prevention Plan (SWPPP), compliance with City of Fresno and Fresno Metropolitan Flood Control District stormwater requirements, and adherence to applicable California Building Standards Code water conservation provisions. Accordingly, the project would not make a cumulatively considerable contribution to regional hydrology or water quality impacts.

Transportation impacts would be less than significant because the project would modernize an existing school campus without increasing student enrollment capacity. As such, the project would not substantially increase vehicle trips, vehicle miles traveled (VMT), or demand on the regional transportation system. In addition, MM TRAN-1 would ensure coordination with the City of Fresno regarding applicable circulation and traffic safety improvements. Therefore, the project's contribution to cumulative transportation impacts would not be cumulatively considerable.

The project would result in no impact or a less-than-significant impact in the areas of aesthetics, agriculture and forestry resources, energy, land use and planning, mineral resources, population and housing, public services, recreation, utilities and service systems, and wildfire. Consequently, the project would not contribute to cumulatively considerable impacts associated with these resource areas.

For the reasons described above, the project would not make a cumulatively considerable contribution to any significant cumulative environmental impact. Therefore, cumulative impacts associated with the proposed project would be **less than significant**.

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

Less than Significant Impact

The proposed project consists of the modernization and redevelopment of an existing elementary school campus within a developed urban area. As evaluated throughout this Initial Study, the project would not result in any unavoidable significant environmental impacts that would have the potential to cause substantial adverse effects on human beings, either directly or indirectly.

Potential impacts related to air quality, greenhouse gas emissions, noise, transportation, biological resources, cultural resources, tribal cultural resources, and paleontological resources were evaluated and, where necessary, mitigation measures have been identified to reduce impacts to a less than significant level. Construction-related impacts would be temporary in nature and would be reduced through compliance with applicable regulations, implementation of mitigation measures, and adherence to standard construction practices.

Potential impacts associated with hazards and hazardous materials would be less than significant. Site investigations conducted for the project did not identify contaminated soils requiring remediation or additional investigation. Although asbestos-containing materials and lead-based paint are present within existing campus structures, these materials would be managed, removed, and disposed of or encapsulated in accordance with applicable federal, State, and local requirements, preventing substantial exposure of students, staff, construction workers, or the surrounding community to hazardous materials.

The project would not substantially increase student enrollment or campus capacity and therefore would not result in substantial increases in traffic, vehicle miles traveled, demand for public services, utilities, or other infrastructure that could indirectly result in adverse effects on human beings. Additionally, the project would comply with applicable building, fire, accessibility, stormwater, and health and safety regulations designed to protect public welfare.

Because all identified project impacts would be less than significant or reduced to a less than significant level through mitigation, the project would not directly or indirectly cause substantial adverse effects on human beings. Therefore, this impact would be **less than significant.**

F. Mitigation, Monitoring, and Reporting Program

1. Purpose

Fresno Unified School District has prepared this Mitigation Monitoring and Reporting Program to comply with Section 15097 of the State CEQA Guidelines. The purpose of the Mitigation Monitoring and Reporting Program is to ensure the implementation of the mitigation measures identified in this Initial Study.

2. Lead Agency

Fresno Unified School District will undertake the project and is the Lead Agency for the project. The District is responsible for the implementation of all mitigation measures identified in this Initial Study.

3. Mitigation Monitoring and Reporting Coordinator

The Fresno Unified School District, Chief Executive, Operational Services, or designee shall act as the Project Mitigation Reporting Coordinator ("Coordinator").

4. Monitoring and Reporting Procedures for Construction

a. The Coordinator shall provide a copy of all project design-, site clearing- and construction-related mitigation measures to the project architect, engineer, and contractor for incorporation in the project plans, construction specifications, permits, and contracts, as appropriate.
b. Before the awarding of the bid, the Coordinator shall determine that all project design-, site clearing- and construction-related mitigation measures have been incorporated in the project plans, construction specifications, permits, and contracts, as appropriate.
c. During construction, the Coordinator, through the construction management team, shall inspect the project area regularly to ensure all work complies with the mitigation measures. If a discrepancy is not resolved within a reasonable time, the Coordinator may order work to cease until the discrepancy is resolved.
d. Before the District accepts the project improvements, the Coordinator shall certify that the project incorporates all project design and construction-related mitigation measures.

5. Monitoring and Reporting Procedures for Operational and Maintenance

Before the project becomes operational, the Coordinator shall determine that the project's operational plans and procedures incorporate all operations-related mitigation measures.

G. List of Preparers

1. Lead Agency

Fresno Unified School District
Alex Belanger
Chief Executive, Operational Services
Fresno Unified School District
2309 Tulare Street
Fresno, CA 93721
Telephone: (559) 457-3074
Email: William.Belanger@fresnounified.org

2. Environmental Consultants:

Blair, Church & Flynn Consulting Engineers, Inc.
451 Clovis Avenue, Suite 200
Clovis, CA 93612
(559) 326-1400
www.bcf-engr.com

Michael Gennaro, QSD, CPESC,
Lead Environmental Specialist
Email: mgennaro@bcf-engr.com

David K. Young
Senior Environmental Specialist
Email: dyoung@bcf-engr.com

Gabriel Ledesma, QSD, QISP, CPESC,
Project Environmental Specialist
Email: gledesma@bcf-engr.com

Johnston & Associates (Historical Resources Assessment Technical Report)
7126 N. Carruth Avenue
Fresno, CA 93711
(559) 438-5330

Karana Hattersley-Drayton, M.A., Architectural Historian
karanadrayton@comcast.net

Certerra Southwest, LLC cba Certerra RMA Geoscience (Phase 1 ESA)
3897 N. Ann Avenue
Fresno, CA 93727
(559) 691-5303
https://www.certerra.com/

Megann Stewart, PG
Project Geologist
mstewart@certerra.com

Jim Vue, GIT
Staff Geologist
jvue@certerra.com

Gabriel J. Valov, GIT
Staff Geologist
gvalov@certerra.com

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Appendix A: Air Quality & Greenhouse Gas Impact Analysis

Draft Air Quality & Greenhouse Gas Impact Analysis

For the Proposed

Norseman Elementary School Modernization Project

Fresno, CA

Prepared for:

Fresno Unified School District
2309 Tulare Street
Fresno, CA 93721

Prepared: July 2026

Prepared By:

Blair, Church & Flynn Consulting Engineers
451 Clovis Avenue, Suite 200
Clovis, CA 93612
www.bcf-engr.com

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List of Common Terms & Acronyms

AB	Assembly Bill
ACM	Asbestos Containing Materials
AHERA	Asbestos Hazard Emergency Response Act
ASHAA	Asbestos School Hazard Abatement Act
ASHARA	Asbestos School Hazard Abatement and Reauthorization Act
ATCM	Airborne Toxic Control Measure
BAAQMD	Bay Area Air Quality Management District
BAU	Business as Usual
BPS	Best Performance Standards
CAAQS	California Ambient Air Quality Standards
CARB	California Air Resources Board
CAFE	Corporate Average Fuel Economy
CCAA	California Clean Air Act
CCAR	California Climate Action Registry
CCR	California Code of Regulations
CEQA	California Environmental Quality Act
CFR	Code of Federal Regulations
CH_4	Methane
CO	Carbon Monoxide
CO_2	Carbon Dioxide
CO_2e	Carbon Dioxide Equivalent
CUSD	Clovis Unified School District
DGS	Department of General Services
DPM	Diesel-Exhaust Particulate Matter or Diesel-Exhaust PM
DRRP	Diesel Risk Reduction Plan
EO	Executive Order
EPA	United State Environmental Protection Agency
EV	Electric Vehicle
FCAA	Federal Clean Air Act
FCOG	Fresno Council of Governments
GGRP	Greenhouse Gas Reduction Plan
GHG	Greenhouse Gases
HAP	Hazardous Air Pollutant
HFC	Hydrofluorocarbon
H_2S	Hydrogen Sulfide
IPCC	Intergovernmental Panel on Climate Change
LEED	Leadership in Energy and Environmental Design
LOS	Level of Service
$MTCO_2e$	Metric Tons of CO_2 Equivalent
NF_3	Nitrogen Trifluoride
N_2O	Nitrous Oxide
NAAQS	National Ambient Air Quality Standards
NESHAPs	National Emission Standards for HAPs
NHTSA	National Traffic Safety Administration
NOx	Oxides of Nitrogen

OPR	Governor's Office of Planning and Research
O_3	Ozone
PCAP	Priority Climate Action Plan
Pb	Lead
PM	Particulate Matter
PM_{10}	Particulate Matter (less than 10 µm)
$PM_{2.5}$	Particulate Matter (less than 2.5 µm)
ppb	Parts per Billion
ppm	Parts per Million
PVC	Polyvinyl Chloride
ROG	Reactive Organic Gases
RTP/SCS	Regional Transportation Plan and Sustainable Communities Strategies
SB	Senate Bill
SCOTUS	Supreme Court of the United States
SF_6	Sulfur Hexafluoride
SIP	State Implementation Plan
SLCP	Short-Lived Climate Pollutants
SMAQMD	Sacramento Air Quality Management District
SJVAB	San Joaquin Valley Air Basin
SJVAPCD	San Joaquin Valley Air Pollution Control District
SO2	Sulfur Dioxide
SRTS	Safe Routes to School
TAC	Toxic Air Contaminant
TSCA	Toxic Substances Control Act
VMT	Vehicle Miles Traveled
VOC	Volatile Organic Compounds
VRP	Visibility Reducing Particles
$\mu g/m^3$	Micrograms per cubic meter
ZEV	Zero Emission Vehicle

Introduction

This report describes the existing surrounding environment and identifies potential air quality and greenhouse gas impacts associated with the proposed Norseman Elementary School Modernization Project (project). Project impacts are evaluated relative to applicable thresholds of significance. Mitigation measures have been identified for significant impacts.

Project Location

The project is located at the existing Norseman Elementary School campus, located at 4636 E Weldon Avenue, Fresno, California 93703 (APN 447-280-01T and 447-280-18T) and surrounding City of Fresno streets. The project site location and vicinity are shown in Figures 1 and 2.

Project Site

The project site includes 15.2 acres of the existing Norseman Elementary School campus and surrounding City of Fresno streets of Weldon Avenue, Woodrow Avenue, University Avenue, and Maple Avenue. The project site can be seen in Figure 3.

Project Summary

The Fresno Unified School District (District) proposes the Norseman Elementary School Modernization Project (Project), a partial modernization of the existing Norseman Elementary School campus. The Project would be funded through Measure H bond funds and would involve demolition, reconstruction, renovation, and site improvements to replace aging facilities with modern educational, administrative, and support spaces that meet current educational standards, California Building Code requirements, accessibility requirements, and Division of the State Architect (DSA) standards. The project would modernize the existing campus and would not increase student enrollment or capacity. The school currently enrolls approximately 550 students.

A total of three permeant classroom buildings and 16 portable buildings totaling 27,850 square feet would be demolished to accommodate three permanent buildings, totaling 28,500 square feet. Approximately 4,570 square feet of existing buildings would also be remodeled. Parking at lots, play areas, landscaped areas, and concrete areas would also be demolished and reconstructed/reconfigured. Construction would start approximately in June 2028. The project would occur in two phases where Phase 2 would start towards the end Phase 1 and both phases finish in August 2029.

Figure 1: Location Map

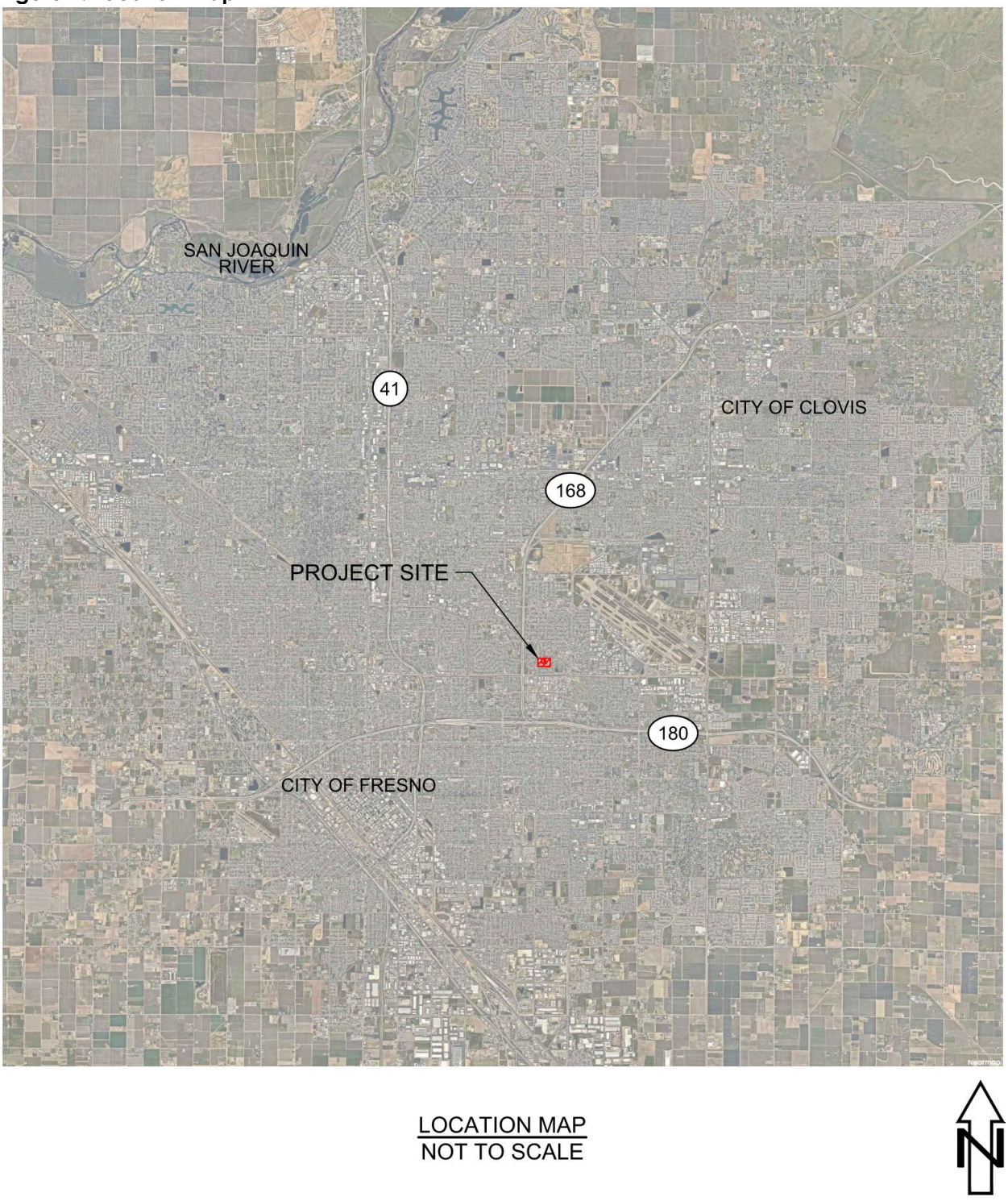


Figure 1: Project Location Map showing an aerial image of the proposed project site in the context of most of the City of Fresno. The project site is shown in central Fresno, east of Highway 168, north of Highway 180, and west of the Fresno Yosemite International Airport.

Figure 2: Vicinity Map

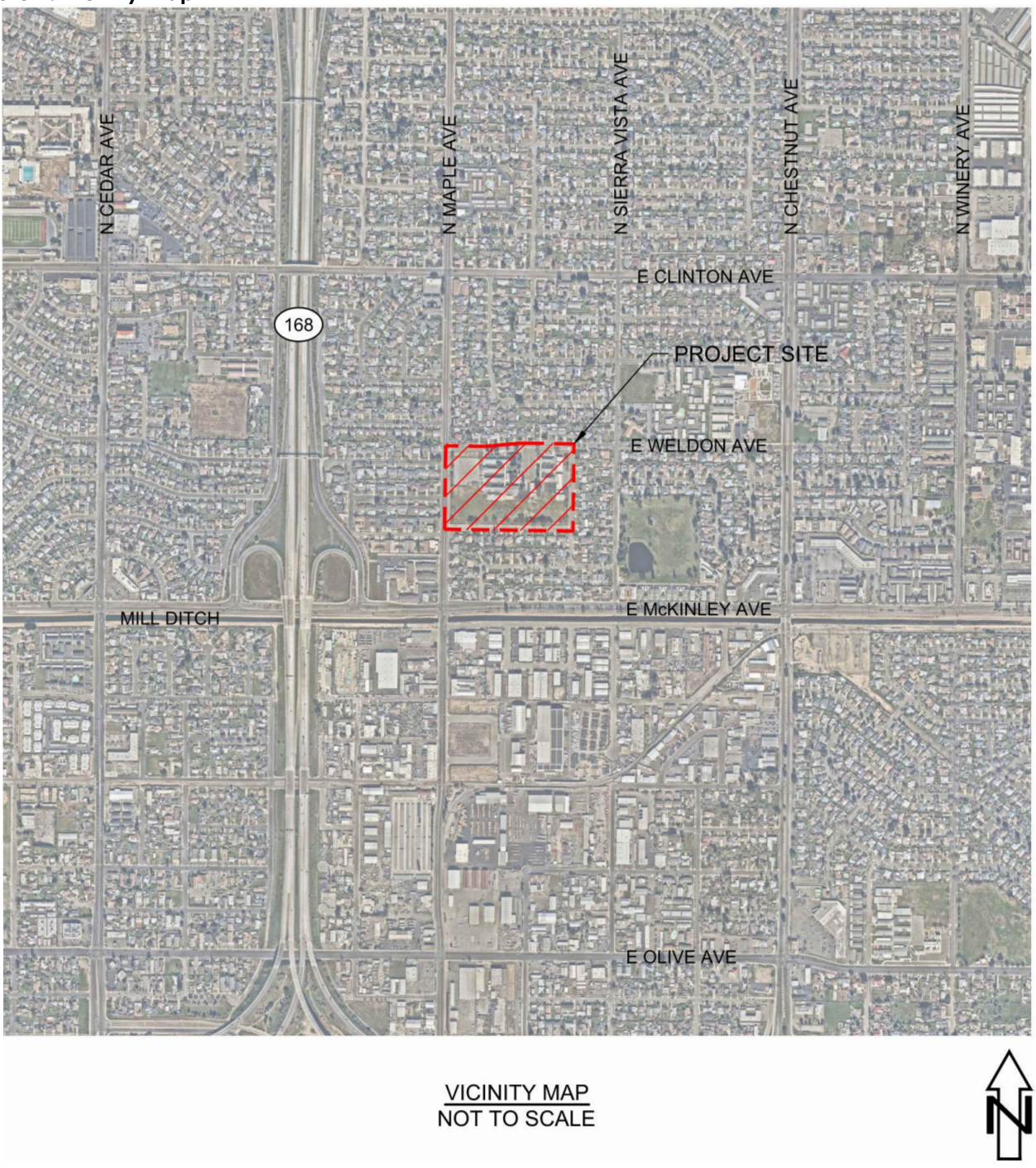


Figure 2: Vicinity Map showing an aerial image of the proposed project site within approximately a 0.75-mile radius around Norseman Elementary School and surrounding land uses. The site is located southeast of the intersection of N. Maple Avenue and E. Weldon Avenue and approximately 1,000 feet east of Hwy 168. Residential land uses surround the school and industrial uses are located further south of the project site.

Figure 3: Project Site



Figure 3: Project Site showing an aerial image of Norseman Elementary School with the project boundary outlined in red. The property is bounded by E. Weldon Avenue to the north, N. Maple Avenue to the west, E. University Avenue to the south, and N. Woodrow Avenue to the east. The image shows school buildings of various sizes, parking lots, play fields, athletic courts, and play structures.

Project Description

The Fresno Unified School District (District) proposes to implement the Norseman Elementary School Modernization Project ("project") using Measure H bond funds. The project would modernize the existing Norseman Elementary School campus through demolition, reconstruction, and renovation of existing facilities implemented in multiple phases. The project is currently in the conceptual design stage, and specific building layouts, architectural features, and site improvements may be refined during final design. Accordingly, this Initial Study evaluates the maximum reasonably foreseeable scope and intensity of development that could occur under the conceptual plan to ensure that any environmental effects are fully disclosed, even if minor design modifications occur.

At maximum buildout, the project would replace aging and outdated campus facilities with modern instructional, administrative, and support spaces designed to meet current educational, building code, accessibility, and Division of the State Architect (DSA) standards. The project is intended to modernize facilities serving the existing student population and would not increase student enrollment or campus capacity. The project site is approximately 15.2 acres and includes all of Norseman Elementary School and the surrounding City of Fresno streets of Weldon Avenue, Woodrow Avenue, University Avenue, and Maple Avenue. The project site can be seen in Figure 3.

Project Objectives and Campus Improvements

In general, the project would modernize the campus by removing portable classrooms and permanent buildings that have exceeded their useful life and constructing new permanent facilities. Proposed improvements, as represented conceptually, would include new classroom buildings, an early learning building, and administrative facilities; upgraded outdoor instructional and play areas; and reconfigured on-site parking and drop-off areas to enhance campus functionality and safety.

As a result of proposed changes to campus access points, parking configuration, and internal circulation, the project may also require off-site traffic safety-related improvements within the public right-of-way, as determined through City of Fresno and/or County of Fresno review and applicable safety or traffic standards. Such improvements, if required, could include modifications such as enhanced signage, pavement striping, crosswalk improvements, traffic calming features, bicycle or pedestrian facility enhancements, or similar safety measures. The specific nature, location, and extent of any off-site improvements have not yet been determined and would be finalized during subsequent design development and discretionary review.

Under the conceptual design evaluated in this Initial Study, new buildings would generally be located in the southeastern portion of the campus, while parking and vehicle circulation improvements would be concentrated in the northeastern portion. Existing buildings in the central portion of the campus would be selectively remodeled and retained. While the final configuration may vary, development would remain within the existing campus boundaries and would not exceed the square footage, impervious surface coverage, or operational characteristics evaluated in this Initial Study.

Construction Phasing

Construction would occur in multiple phases to allow the school to remain operational throughout implementation. Construction is anticipated to begin in approximately June 2028 and conclude by approximately

August 2029. While the exact sequencing and timing may be adjusted during final design and contractor selection, the project would generally occur as follows:

Phase 1A: Southeast Campus Demolition
Phase 1A would involve demolition of Portable Buildings P1 through P4 and P12 through P16, along with removal of two play structures, a blacktop area, and an athletic field located in the southeastern portion of the campus. This phase would include demolition of approximately 10,350 square feet of classroom space and site clearing of approximately 3.2 acres of concrete, asphalt, and turf grass. Demolition is anticipated to occur during summer 2028.

Phase 1B: Southeast Campus Reconstruction
Phase 1B would include construction of an administration building, an early learning building, and a classroom building within the previously demolished area. Outdoor improvements would include a blacktop play court, play structures, a playfield, and a parking lot along University Avenue with up to approximately 59 parking spaces. Construction is anticipated to occur between approximately June 2028 and August 2029.

Phase 2A: Northeast Campus Demolition
Phase 2A would demolish Classroom Buildings I, G, and H; Portable Buildings P5 through P11; the existing north parking lot and street-side parking along Weldon Avenue; the east parking lot along Woodrow Avenue; selected landscaped areas; and a play structure in the northeastern portion of the campus. This phase would include demolition of approximately 18,930 square feet of building space and site clearing of approximately 2.06 acres of asphalt, concrete, and landscaping. Demolition is anticipated to occur between approximately June 2028 and August 2029.

Phase 2B: Northeast Campus Reconstruction and Existing Building Remodel
Phase 2B would include construction of an approximately 2.5-acre parking lot with up to approximately 116 parking spaces and a student drop-off loop with an entrance on Weldon Avenue and an exit on Woodrow Avenue. During this phase, existing Classroom Building J would be remodeled internally and converted to a library, while Building E would be remodeled and retained for administrative use. Existing Buildings A, B, C, D, and F and Portable Buildings P17 through P20 would receive fire suppression and fire alarm upgrades. Construction of this phase is anticipated to occur between approximately June 2029 and August 2029.

Building Area and Design Parameters

The existing campus contains approximately 68,000 gross square feet (GSF) of building space. The project would demolish up to approximately 32,400 GSF and construct up to approximately 28,500 GSF of new facilities, resulting in a modernized campus totaling approximately 64,100 GSF. Parking spaces would increase from 116 existing parking stalls to approximately 175 proposed parking spaces. Final square footage and parking may vary slightly; however, the project would remain within this maximum development envelope and would not result in additional student capacity.

All new and remodeled facilities would be designed and constructed in compliance with the applicable California Building Standards Code in effect at the time of permitting, DSA requirements, and state mandates for energy efficiency, water efficiency, seismic safety, fire protection, indoor environmental quality, and drought-tolerant landscaping.

Utilities and Infrastructure

Water and sanitary sewer services would be provided by the City of Fresno. Stormwater drainage would be managed through on-site collection systems and conveyed to off-site facilities operated by the Fresno Metropolitan Flood Control District (FMFCD). Electrical service would be provided by Pacific Gas and Electric Company (PG&E). Minor modifications or extensions to existing utility infrastructure may occur as part of final design but would remain within the development parameters evaluated in this Initial Study.

Figure 4: Existing Project Site Map



Figure 4: Existing Project Site Diagram showing Norseman Elementary School campus layout. The east portion includes three permanent buildings (H, J, and K) and 16 portable buildings (P1–P16), with surrounding concrete areas, play structures, landscaping, and a parking lot along N. Woodrow Avenue and E. Weldon Avenue, and parking stalls off of E. Weldon Avenue. The west campus has seven permanent buildings (A through G), four portable buildings (P17–P20), parking stalls and a bus drop-off lane along E. Weldon Avenue, and asphalt play courts and play structures along the west perimeter.

Figure 5: Proposed Conceptual Phase 1A Demolition Site Map



Figure 5: Proposed Conceptual Phase 1A Demolition Site Map shows a diagram of the existing campus, but with the southeast quarter of the site marked for demolition and an access road to the west blacktop. Demolition includes Portables P1 through P4 and portables P12 through P16, the central site parking lot, a portion of the east parking lot, two play structures, and a playfield. Existing Buildings A, B, C, D, F, and Portable Buildings P17 through P20 are marked for fire and alarm upgrades.

Figure 6: Proposed Conceptual Phase 1B Site Map



Figure 6: Proposed Conceptual Phase 1B Proposed Site Map showing Norseman Elementary School campus with a construction area and proposed new facilities shown in the southeast quarter of the site. New facilities include an administration building, early learning building, classroom building, a parking lot with an access road connecting to the existing west blacktop, a new blacktop, three play structures, and a playfield.

Figure 7: Proposed Conceptual Phase 2A Demolition Site Map

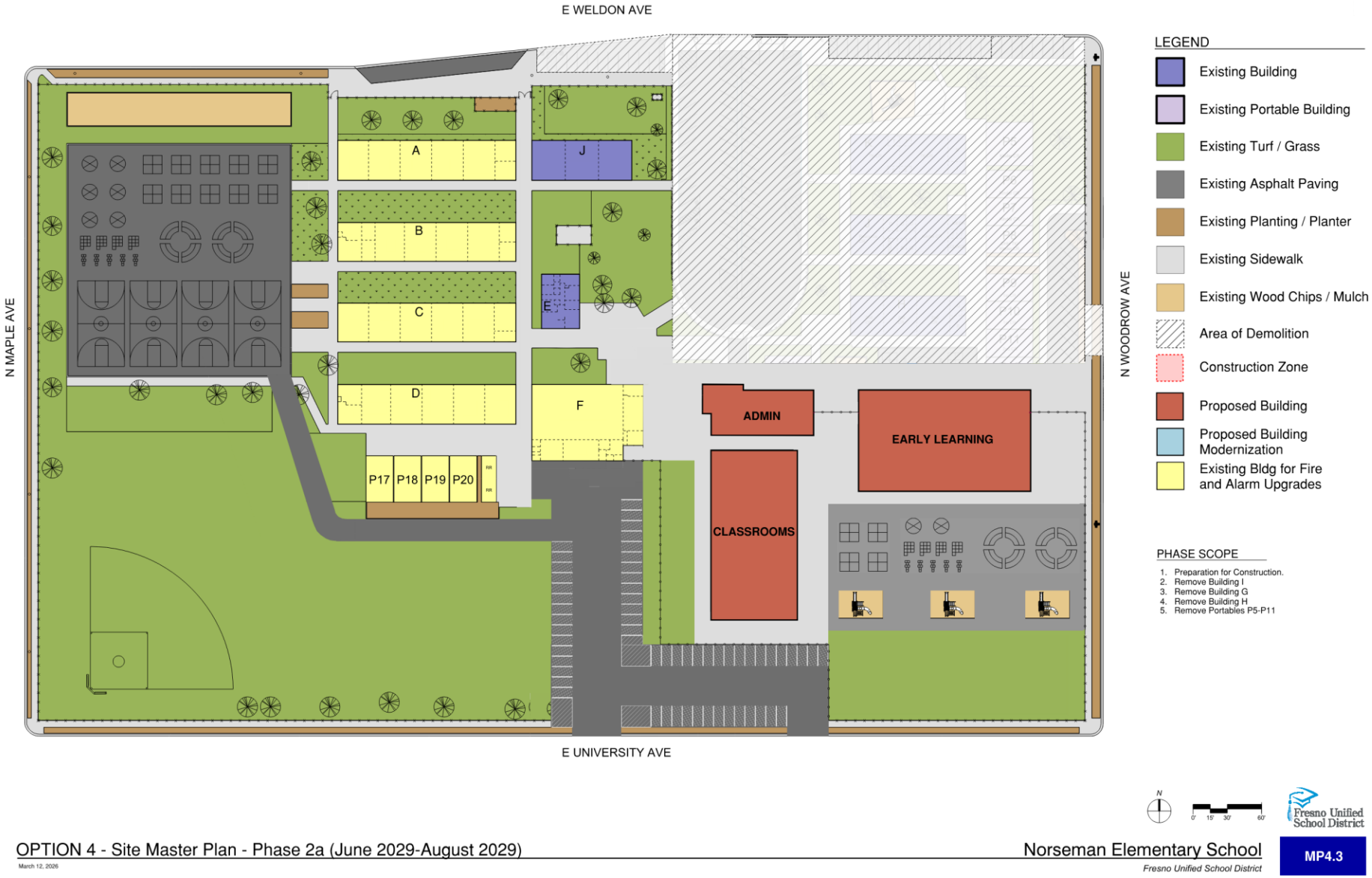


Figure 7: Proposed Conceptual Phase 2A Demolition Site Map showing Norseman Elementary School campus with Phase 1B improvements completed in the southeast quarter, and the northeast quarter marked for demolition. Demolition includes Buildings I, G, and H, Portable Buildings P5 through P11, the north parking lot, the remainder of the east parking lot, and roadside parking along Weldon Avenue.

Figure 8: Proposed Conceptual Phase 2B Site Map

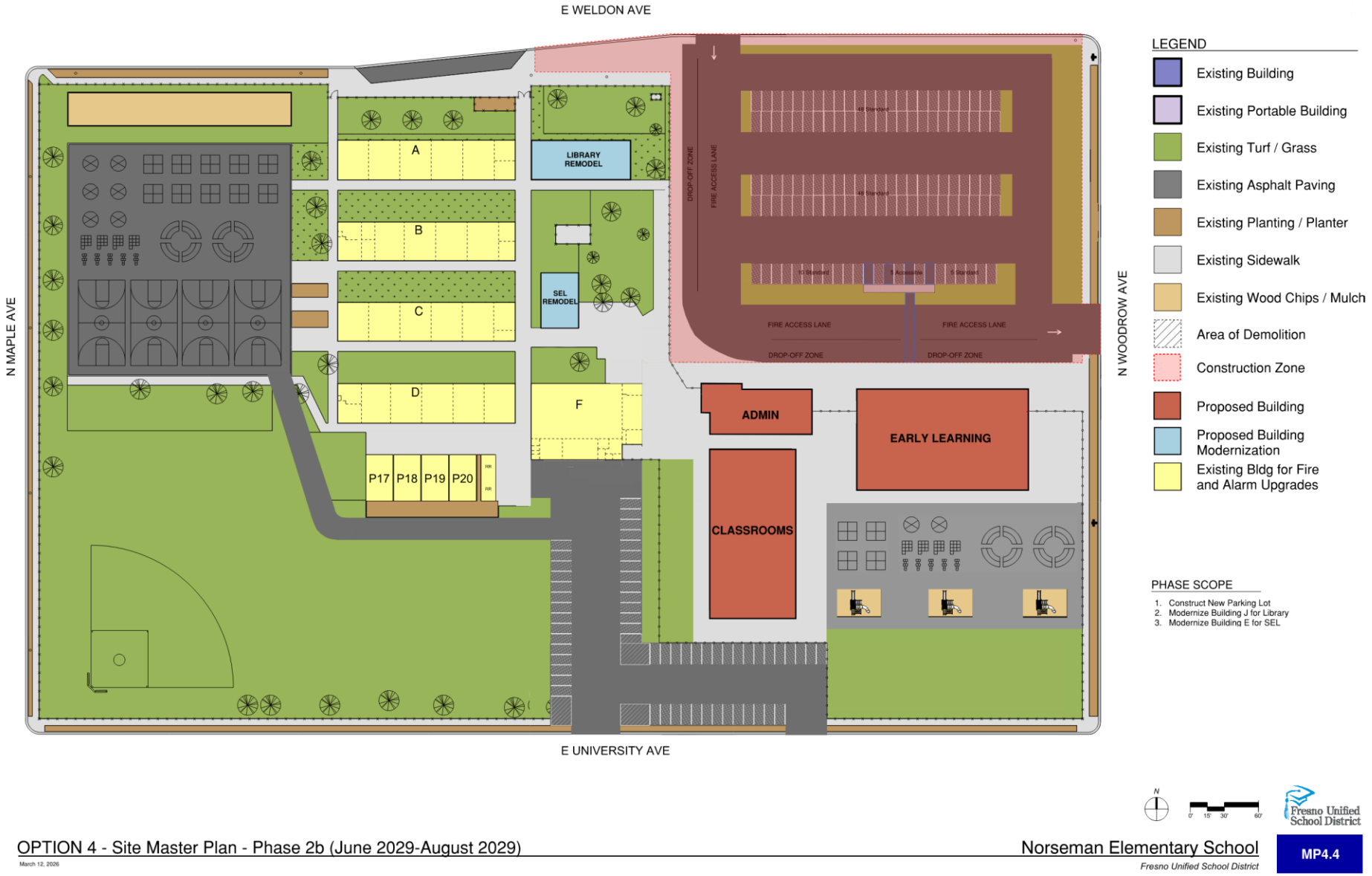


Figure 8: Proposed Phase 2B Site Map showing Norseman Elementary School campus with the northeast quarter of the site marked as a construction area and showing improved with a parking lot and a drop-off loop with an entrance on Weldon Avenue and an exit on Woodrow Avenue. Existing Building J is marked for remodel to convert to a library and Building E is marked for remodel.

Figure 9: Proposed Conceptual Final Site Map



Figure 9: Proposed Conceptual Final Site Map showing the completed site with improvements from all phases. The figures shows the new administration, classroom, and early learning buildings in the southeast with a new play area and south parking lot, a new parking lot and drop-off loop in the northeast, two remodeled buildings in the center-north of the campus, fire and alarm upgrades to existing Buildings A, B, C, D, and F, and Portable Buildings P17 through P20. The west side of the campus remains unchanged from the existing campus.

Air Quality Impact Analysis

Existing Setting

The project is located within the San Joaquin Valley Air Basin (SJVAB). The SJVAB is within the jurisdiction of the San Joaquin Valley Air Pollution Control District (SJVAPCD). Air quality in the SJVAB is influenced by various factors, including topography, local and regional meteorology. Factors affecting regional and local air quality are discussed below.

Topography, Meteorology, and Pollutant dispersion

The dispersion of air pollution in an area is determined by such natural factors as topography, meteorology, and climate, coupled with atmospheric stability conditions and the presence of inversions. The factors affecting the dispersion of air pollution with respect to the SJVAB are discussed below.

Topography

The SJVAB is in the southern half of California's Central Valley. It is open to the north but surrounded by mountain ranges on all other sides. The Coast Ranges, with an average elevation of 3,000 feet, form the western boundary, while the Sierra Nevada Mountains, ranging from 8,000 to 14,000 feet, are on the eastern side. The southern boundary is defined by the San Emigdio and Tehachapi Mountains, part of the Coast Ranges and Sierra Nevada, respectively, with elevations ranging from 6,000 to 8,000 feet. The terrain of the SJVAB is mostly flat, with a gentle downward slope to the northwest (San Joaquin Valley Air Pollution Control District 2015).

Meteorology and Climate

The SJVAB experiences an inland Mediterranean climate, heavily influenced by surrounding mountain ranges. These mountains create a partial rain shadow effect, causing Pacific winter storms to release precipitation on the western slopes and limiting rainfall within the valley. Additionally, the topography restricts air circulation, leading to stagnant air conditions during the cooler months.

Summers in the SJVAB are typically hot, dry, and clear, while winters are mild and humid. This climate pattern results from the region's topography and the influence of a semi-permanent subtropical high-pressure system. During summer, this high-pressure cell stabilizes atmospheric conditions and directs consistent northwesterly winds. These winds cause upwelling of cold ocean water along the California coast. In winter, the high-pressure system weakens and shifts southward, leading to offshore winds, reduced upwelling, and increased storm activity.

Annual patterns of temperature, humidity, precipitation, and wind in the SJVAB are shaped by its topography and the position of the subtropical high-pressure cell. Summertime often brings temperatures exceeding 100°F and clear skies, conditions conducive to ozone formation. Most precipitation occurs as rainfall during winter storms, which also bring winds and atmospheric instability, resulting in periods of low air pollution and improved visibility. However, between these storms, high-pressure systems and light winds can create temperature inversions and

stable atmospheric conditions, leading to increased pollutant concentrations. Wind patterns in the SJVAB align with the valley's orientation; in summer, northwesterly winds can transport ozone and its precursors from the San Francisco Bay Area into the valley, while winter winds come from the southeast, with calm conditions often prevailing (San Joaquin Valley Air Pollution Control District 2015).

The project site is situated in the City of Fresno, which is primarily serviced by Pacific Gas & Electric (PG&E). The region experiences a semi-arid climate, with an average annual precipitation of 10.89 inches. Temperatures fluctuate from its average lower temperature in January of 37.6°F to its average higher temperature in July at 98.3°F (Western Regional Climate Center 2025).

Atmospheric Stability and Inversions

Atmospheric stability refers to the atmosphere's resistance to vertical air movement, which is influenced by the vertical temperature profile. Stability classifications range from "Extremely Unstable" (Class A) to "Stable" (Class F). Unstable conditions, often occurring during daytime due to solar heating, facilitate significant vertical mixing and horizontal wind fluctuations. In contrast, stable conditions, more common during nighttime or periods with minimal surface heating, suppress vertical air movement, leading to limited dispersion of pollutants.

In the SJVAB, stable conditions (Classes D through F) are prevalent during late fall and winter, characterized by cool temperatures and trapped surface air. Transitional months like March and August experience a mix of stability conditions, while spring and summer months (April through July) are dominated by unstable conditions (Class A).

Temperature inversions, where a warmer air layer overlays cooler surface air, significantly impact the vertical dispersion of pollutants by limiting the mixing depth. The SJVAB experiences both surface-based inversions, common in the mornings and typically disrupted by daytime warming, and elevated inversions, which are less frequent but can cause more severe air stagnation. Surface-based inversions are more frequent in the fall, whereas stronger elevated inversions are typical in December and January.

These atmospheric conditions, combined with the SJVAB's topography, contribute to the region's challenges in dispersing air pollutants, affecting overall air quality (San Joaquin Valley Air Pollution Control District 2015).

Air Pollutants of Concern

Criteria Air Pollutants

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

preventing environmental and property damage. The Clean Air Act permits states to adopt additional or more stringent standards to further protect public health and the environment (Environmental Protection Agency 2024).

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

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

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

Table 1. State and Federal Criteria Air Pollutant Effects and Sources

Pollutant	Principal Health and Atmospheric Effects	Typical Sources
Ozone (O_3)	High concentrations irritate lungs. Long-term exposure may cause lung tissue damage and cancer. Long-term exposure damages plant materials and reduces crop productivity. Precursor organic compounds include many known toxic air contaminants. Biogenic VOC may also contribute.	Low-altitude ozone is formed from reactive organic gases/volatile organic compounds (ROG or VOC) and nitrogen oxides (NOx) in the presence of sunlight and heat. Common precursor emitters include motor vehicles and other internal combustion engines, solvent evaporation, boilers, furnaces, and industrial processes.
Respirable Particulate Matter (PM_{10})	Irritates eyes and respiratory tract. Decreases lung capacity. Associated with increased cancer and mortality. Contributes to haze and reduced visibility. Includes some toxic air contaminants. Many toxic and other aerosol and solid compounds are part of PM_{10}.	Dust- and fume-producing industrial and agricultural operations; combustion smoke & vehicle exhaust; atmospheric chemical reactions; construction and other dust-producing activities; unpaved road dust and re-entrained paved road dust; natural sources.
Fine Particulate Matter ($PM_{2.5}$)	Increases respiratory disease, lung damage, cancer, and premature death. Reduces visibility and produces surface soiling. Most diesel exhaust particulate matter – a toxic air contaminant – is in the $PM_{2.5}$ size range. Many toxic and other aerosol and solid compounds are part of $PM_{2.5}$.	Combustion including motor vehicles, other mobile sources, and industrial activities; residential and agricultural burning; also formed through atmospheric chemical and photochemical reactions involving other pollutants including NOx, sulfur oxides (SOx), ammonia, and ROG.
Carbon Monoxide (CO)	CO interferes with the transfer of oxygen to the blood and deprives sensitive tissues of oxygen. CO also is a minor precursor for photochemical ozone. Colorless, odorless.	Combustion sources, especially gasoline-powered engines and motor vehicles. CO is the traditional signature pollutant for on-road mobile sources at the local and neighborhood scale.
Nitrogen Dioxide (NO_2)	Irritating to eyes and respiratory tract. Color's atmosphere reddish-brown. Contributes to acid rain & nitrate contamination of stormwater. Part of the "NOx" group of ozone precursors.	Motor vehicles and other mobile or portable engines, especially diesel; refineries; industrial operations.
Sulfur Dioxide (SO_2)	Irritates respiratory tract; injures lung tissue. Can yellow plant leaves. Destructive to marble, iron, steel. Contributes to acid rain. Limit's visibility.	Fuel combustion (especially coal and high-sulfur oil), chemical plants, sulfur recovery plants, metal processing; some natural sources like active volcanoes. Limited contribution possible from heavy-duty diesel vehicles if ultra-low sulfur fuel not used.
Lead (Pb)	Disturbs gastrointestinal system. Causes anemia, kidney disease, and neuromuscular and neurological dysfunction. Also, a toxic air contaminant and water pollutant.	Lead-based industrial processes like battery production and smelters. Lead paint, leaded gasoline. Aerially deposited lead from older gasoline use may exist in soils along major roads.
Visibility-Reducing Particles (VRP)	Reduces visibility. Produces haze. NOTE: not directly related to the Regional Haze program under the Federal Clean Air Act, which is oriented primarily toward visibility issues in National Parks and other "Class I" areas. However, some issues and measurement methods are similar.	See particulate matter above. May be related more to aerosols than to solid particles.
Sulfate	Premature mortality and respiratory effects. Contributes to acid rain. Some toxic air contaminants attach to sulfate aerosol particles.	Industrial processes, refineries and oil fields, mines, natural sources like volcanic areas, salt-covered dry lakes, and large sulfide rock areas.
Hydrogen Sulfide (H_2S)	Colorless, flammable, poisonous. Respiratory irritant. Neurological damage and premature death. Headache, nausea. Strong odor.	Industrial processes such as: refineries and oil fields, asphalt plants, livestock operations, sewage treatment plants, and mines. Some natural sources like volcanic areas and hot springs.
Vinyl Chloride	Neurological effects, liver damage, cancer. Also considered a toxic air contaminant.	Industrial processes.
Source: (California Air Resources Board n.d.)		

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

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

- Fine particles ($PM_{2.5}$): Measuring 2.5 micrometers or smaller, these are common in smoke and haze, originating from sources such as wildfires or forming through chemical reactions in the atmosphere. They penetrate deep into the lungs, reaching the alveoli.

- Ultrafine particles (UFP): Smaller than 0.1 micrometers, these are produced by the combustion of fossil fuels, wood, and hydrocarbons. Though UFPs constitute a small fraction of $PM_{2.5}$ by mass, their high surface area and ability to enter the bloodstream can lead to greater health impacts.

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

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

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

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

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

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

Other Pollutants

California has established air quality standards for certain pollutants not regulated at the federal level. The California Air Resources Board (CARB) has established state-specific standards for hydrogen sulfide, sulfates, vinyl chloride, and visibility-reducing particles. The following provides an overview of these pollutants, including their characteristics, health and environmental effects, sources, and prevalence.

Sulfates (SO_4^{2-}) are the fully oxidized form of sulfur, typically found in combination with metal or hydrogen ions. In California, the primary source of sulfate emissions is the combustion of sulfur-containing petroleum fuels such as gasoline and diesel. During combustion, sulfur is converted into sulfur dioxide (SO_2), which then undergoes atmospheric oxidation to form sulfate compounds. This transformation occurs quickly and extensively in urban regions due to California's meteorological conditions.

CARB's sulfate standard aims to prevent respiratory health issues. Exposure to elevated sulfate levels has been linked to reduced lung function, worsened asthma symptoms, and an increased risk of cardiovascular and pulmonary diseases. Additionally, sulfates contribute significantly to reduced visibility and, because of their acidic nature, can damage ecosystems, materials, and infrastructure.

Visibility-Reducing Particles are a category of airborne particulate matter composed of solid fragments, liquid-coated particles, and fine liquid droplets. CARB's standard for these particles is intended to minimize regional haze that reduces visibility. The standard corresponds to a nominal visual range of 10 miles, helping to mitigate the frequency and severity of visibility impairment in affected areas.

Vinyl Chloride (C_2H_3Cl, VCM) is a synthetic, colorless gas that does not naturally occur in the environment. It is produced when compounds like trichloroethane, trichloroethylene, and tetrachloroethylene break down. Vinyl chloride is a key precursor in polyvinyl chloride (PVC), a widely used plastic material in products such as pipes, electrical wire coatings, and packaging.

Odors

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

Sensitivity to odors varies significantly among individuals, making odor perception highly subjective. Some people can detect extremely low concentrations of certain substances, while others may not be as sensitive but could have heightened reactions to different odors. Additionally, personal perception of odors differs—what one person finds offensive, another might find pleasant or neutral (e.g., the smell of fast food). Unfamiliar odors tend to be more noticeable and more likely to generate complaints compared to familiar ones. This is due to a phenomenon known as odor fatigue, in which continuous exposure to an odor leads to desensitization, making it less perceptible over time unless its intensity changes.

Odors are characterized by two key properties: quality and intensity. Quality refers to the nature of the odor, such as whether it is floral or sweet. Intensity measures the odor's strength, which depends on the concentration of the odorant in the air. As an odorous substance is diluted, its concentration decreases, reducing its intensity until it reaches the detection threshold—below this point, the average person can no longer perceive it.
There are no federal or state regulations specifically governing odor control. The SJVAPCD does not have a dedicated rule addressing odors; however, they are covered under SJVAPCD Rule 4102 (Nuisance). Enforcement of odor-related concerns depends on complaints filed by citizens with local authorities or the SJVAPCD (San Joaquin Valley Air Pollution Control District 1992).

Toxic Air Contaminants

Toxic air contaminants (TACs) are pollutants that can lead to increased mortality, serious illness, or pose a general hazard to human health. While typically present in very small amounts in the atmosphere, their high toxicity means they can be harmful even at low concentrations. Unlike criteria pollutants, for which acceptable exposure levels are established through state and federal ambient air quality standards, TACs do not have a known safe threshold below which health effects are not expected. As a result, TACs are not classified as "criteria pollutants" under the FCAA or the California Clean Air Act (CCAA) and are not subject to National or State Ambient Air Quality Standards (AAQS). Instead, these pollutants are regulated separately by the EPA and the CARB through various regulations requiring advanced emission control technologies. The EPA enforces National Emission Standards for Hazardous Air Pollutants (NESHAPs), which set limits on emissions from specific sources based on technology standards, in accordance with the FCAA and its amendments (Environmental Protection Agency 2024).

In California, TACs are primarily regulated under the Tanner Air Toxics Act (AB 1807) and the Air Toxics Hot Spots Information and Assessment Act of 1987 (AB 2588). The Tanner Act outlines a detailed process through which ARB identifies and designates substances as TACs, incorporating research, scientific peer review, and public input. Meanwhile, the Air Toxics Hot Spots Act requires facilities emitting TACs to:

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

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

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

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

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

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

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

Benzene is a highly carcinogenic substance prevalent throughout California. The CARB classified benzene as a TAC in January 1985. Approximately 88% of benzene emissions in California originate from motor vehicles, including evaporative leaks and unburned fuel exhaust from on-road vehicles, recreational boats, off-road recreational vehicles, and lawn and garden equipment. Benzene is also produced as a partial combustion byproduct of larger aromatic fuel components. Industrial stationary sources contribute to benzene emissions to a lesser extent. The main stationary sources include crude petroleum and natural gas extraction, petroleum refining, and electricity generation using petroleum products. Residential combustion activities, such as cooking and water heating, are the primary area sources of benzene emissions (California Air Resources Board n.d.). Acute inhalation exposure of humans to benzene may cause drowsiness, dizziness, headaches, eye, skin, and respiratory tract irritation, and, at high levels, unconsciousness. Chronic inhalation exposure has caused various disorders in the blood, including reduced numbers of red blood cells and aplastic anemia, in occupational settings. Reproductive effects have been reported for women exposed by inhalation to high levels, and adverse effects on the developing fetus have been observed in animal tests.

Increased incidences of leukemia (cancer of the tissues that form white blood cells) have been observed in humans occupationally exposed to benzene. The EPA has classified benzene as known human carcinogen for all routes of exposure (Environmental Protection Agency n.d.).

The CARB identified 1,3-butadiene as a TAC in 1992. Most 1,3-butadiene emissions result from the incomplete combustion of gasoline and diesel fuels, with mobile sources being the primary contributors. Other sources include agricultural waste burning, forest management burns, petroleum refining, synthetic material manufacturing, and oil and gas extraction. Wildfires are the main natural source of 1,3-butadiene emissions.

Acute inhalation exposure to 1,3-butadiene can irritate the eyes, nasal passages, throat, and lungs. Epidemiological studies suggest a possible link between 1,3-butadiene exposure and cardiovascular diseases. Research on rubber plant workers has shown an increased incidence of leukemia associated with 1,3-butadiene exposure. Animal studies have also reported tumors at various sites due to 1,3-butadiene exposure. In California, 1,3-butadiene is recognized as a carcinogen (California Air Resources Board 1992).

Carbon Tetrachloride was identified by the CARB as a TAC in 1987 under California's TAC program. The main stationary sources of carbon tetrachloride emissions include chemical and allied product manufacturers and petroleum refineries. Historically, carbon tetrachloride was used in dry cleaning and as a grain fumigant, but these uses are no longer permitted in the United States. Since 1987, carbon tetrachloride has not been registered for pesticidal use in California, and its use in indoor products has been discontinued nationwide. Statewide carbon tetrachloride emissions are low, around 1.96 tons per year, with background concentrations posing most health risks.

Carbon tetrachloride primarily affects the liver, kidneys, and central nervous system in humans. Acute inhalation or oral exposure can cause symptoms such as headache, weakness, lethargy, nausea, and vomiting. Higher levels of acute exposure and chronic exposure can lead to liver and kidney damage. While human data on the carcinogenic effects of carbon tetrachloride are limited, animal studies have shown an increased risk of liver cancer from ingestion. In California, carbon tetrachloride is recognized as a carcinogen (California Air Resources Board 1987).

Hexavalent Chromium was identified as a TAC in 1986. Sources of Hexavalent chromium include industrial metal finishing processes, such as chrome plating and chromic acid anodizing, and firebrick lining of glass furnaces. Other sources include mobile sources, including gasoline motor vehicles, trains, and ships.

The respiratory tract is the major target organ for hexavalent chromium toxicity, for acute and chronic inhalation exposures. Shortness of breath, coughing, and wheezing were reported from a case of acute exposure to hexavalent chromium, while perforations and ulcerations of the septum, bronchitis, decreased pulmonary function, pneumonia, and other respiratory effects have been noted from chronic exposure. Human studies have clearly established that inhaled hexavalent chromium is a human carcinogen, resulting in an increased risk of lung cancer. In California, hexavalent chromium has been identified as a carcinogen (California Air Resources Board 2004).

Para-dichlorobenzene was designated as a TAC by the CARB in April 1993. The main sources of para-dichlorobenzene emissions are consumer products, including non-aerosol insect repellents and solid or gel air fresheners, which account for all emissions statewide.

Acute inhalation exposure to para-dichlorobenzene can cause irritation to the eyes, skin, and throat in humans. Long-term exposure may impact the liver, skin, and central nervous system. The EPA has classified para-dichlorobenzene as a possible human carcinogen (California Air Resoucres Board 1993).

Formaldehyde was identified as a TAC by the CARB in 1992. It is both directly emitted into the atmosphere and formed through photochemical oxidation, which is the largest source of formaldehyde in California's ambient air. Direct emissions result from incomplete combustion, with vehicular exhaust being a primary source. Formaldehyde is also used in resins, consumer products as an antimicrobial agent, fumigants, and soil disinfectants. Major area sources include wood burning in residential fireplaces and wood stoves.

Exposure to formaldehyde can occur through inhalation of contaminated indoor air, tobacco smoke, or urban air. Both acute and chronic inhalation exposure can cause respiratory symptoms and irritation of the eyes, nose, and throat. Limited human studies have linked formaldehyde exposure to lung and nasopharyngeal cancer, while animal studies have shown an increased incidence of nasal squamous cell cancer. Formaldehyde is classified as a probable human carcinogen (California Air Resources Board 2020).

Methylene Chloride was identified as a TAC by the CARB in 1987. It is used as a solvent, blowing agent, and cleaning agent in the production of polyurethane foam and plastic products, as well as in paint stripping operations. Paint removers are the largest users of methylene chloride in California, where it is a key ingredient in many formulations. Stationary sources reporting methylene chloride emissions include plastic product manufacturers, synthetic material manufacturers, and aircraft and parts manufacturers.

Acute inhalation of methylene chloride primarily affects the nervous system, causing reversible symptoms such as decreased visual, auditory, and motor functions. Chronic exposure suggests that the central nervous system is a potential target in both humans and animals. While human data on the carcinogenicity of methylene chloride are inconclusive, animal studies have shown increased incidences of liver and lung cancer, as well as benign mammary gland tumors. In California, methylene chloride is recognized as a carcinogen (California Air Resources Board 1989).

Perchloroethylene was identified as a TAC by the CARB in 1991. It is primarily used as a solvent in dry cleaning operations, but also in degreasing, paints and coatings, adhesives, aerosols, specialty chemical production, printing inks, silicones, rug shampoos, and laboratory solvents. In California, stationary sources reporting perchloroethylene emissions include dry cleaning plants, aircraft part and equipment manufacturers, and fabricated metal product manufacturers. Major area sources include consumer products like automotive brake cleaners and tire sealants.

Acute inhalation exposure to perchloroethylene can cause irritation of the upper respiratory tract and eyes, kidney dysfunction, and neurological effects such as reversible mood and behavioral changes, impaired

coordination, dizziness, headaches, sleepiness, and unconsciousness. Chronic exposure can lead to neurological issues, including headaches, cognitive and motor function impairments, and color vision decrements, as well as cardiac arrhythmia, liver damage, and potential kidney damage. In California, perchloroethylene is recognized as a carcinogen (California Air Resources Board 1991).

Asbestos

Asbestos refers to several types of naturally occurring fibrous minerals found in various parts of California, with chrysotile being the most common type. Serpentine rock, which often contains chrysotile asbestos, is abundant in the Sierra foothills, the Klamath Mountains, and the Coast Ranges. However, the project site is not in an area known for ultramafic rock (U.S Geologic Survey 2011).

Asbestos is typically found in ultramafic rock, including serpentine, and near fault zones. The asbestos content in these rocks can range from less than 1% to about 25% or more. Asbestos is released when ultramafic and serpentine rock is broken or crushed, such as when cars drive over unpaved roads surfaced with these rocks, during land grading for construction, or at quarrying operations. Natural weathering and erosion also release asbestos, which can become airborne and remain in the air for extended periods.

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

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

All types of asbestos are hazardous and can cause lung disease and cancer. Health risks depend on the level and duration of exposure. The longer and more intense the exposure, the higher the risk of health problems. Asbestos-related diseases, such as lung cancer, may not appear until decades after exposure. Smoking increases the risk of lung cancer from asbestos exposure (California Air Resources Board n.d.).

Valley Fever

Valley fever, scientifically known as coccidioidomycosis or "desert rheumatism," is an infection caused by the fungus Coccidioides. While it primarily affects the lungs, severe cases can spread to other parts of the body.

Coccidioides spores become airborne when contaminated soil and dust are disturbed by human activity, animals, or weather. These microscopic spores can be inhaled, leading to infection. Once in the lungs, the spores transform into spherules, which grow and release smaller endospores that can spread within the lungs or to other organs. Rarely, the spores can enter the skin through cuts or wounds, causing skin infections.

Symptoms of valley fever typically appear 1 to 3 weeks after exposure and include fatigue, coughing, fever, shortness of breath, headaches, night sweats, muscle aches, joint pain, and rashes. About 5 to 10 percent of those infected may develop serious or long-term lung issues, and around 1 percent may experience the infection spreading to other body parts, such as the central nervous system, skin, or bones. People with weakened immune systems are at higher risk for severe forms of the disease. The fungus does not spread from person to person or between people and animals, except in very rare cases through wound infections or organ transplants. Most people recover from valley fever without treatment within a few months, but antifungal medications may be prescribed to reduce symptom severity or prevent complications, especially for those at higher risk. Treatment usually lasts 3 to 6 months, but longer treatment may be necessary in some cases. If the infection leads to meningitis, lifelong antifungal treatment is typically required.

Researchers are studying how weather and climate patterns affect the habitat of Coccidioides. The fungus thrives in soil after heavy rainfall and disperses into the air during hot, dry conditions. Increased valley fever cases have been linked to such weather patterns in Arizona and California. The impact of climate change on the prevalence and geographic range of valley fever remains an area of ongoing research (Center for Disease Control and Prevention 2024).

Regulatory Framework

Air quality within the SJVAB is regulated by several authorities including the EPA, CARB, and the SJVAPCD. Each of these authorities develops rules, regulations, and policies to attain the goals or directives imposed upon them through legislation. EPA regulations may not be superseded, but both state and local regulations may be more stringent.

Federal

Federal Clean Air Act

The Federal Clean Air Act (FCAA) was first enacted in 1963 and later amended in 1970 and 1990, 2003, and 2010. The Act establishes the legal framework for regulating air quality in the United States and aims to protect public health and the environment by controlling air pollution. It requires the EPA to set NAAQS for pollutants harmful to human health and the environment, and states must develop State Implementation Plans (SIPs) to meet these standards. The Act also regulates emissions from mobile sources such as cars and trucks and stationary sources such as factories and power plants. Amendments to the clean Air Act Include:

1. Clean Air Act Amendments of 1970: This was the first major update to the original Clean Air Act of 1963, established the NAAQS for six criteria pollutants.
2. Clean Air Act Amendments of 1977: This amendment required states to develop implementation plans to meet the NAAQS and provided new authorities for enforcement.
3. Clean Air Act Amendments of 1990: This amendment expanded the NAAQS to include additional pollutants, such as ozone and particulate matter, and established the Acid Rain Program, the Stratospheric Ozone Protection Program, and the Toxics Release Inventory. It also provided new

provisions for regulating mobile sources of air pollution and established market-based mechanisms such as emissions trading (Environmental Protection Agency 2024).

4. Clear Skies Act of 2003: This proposed amendment sought to reduce power plant emissions of sulfur dioxide, nitrogen oxides, and mercury, but was never enacted into law (Environmental Protection Agency 2016).
5. Clean Air Act Amendments of 2010: This amendment updated the Clean Air Act to address greenhouse gas emissions and provided new regulatory authority to the EPA to regulate emissions of carbon dioxide and other greenhouse gases (U.S. Senate 2009-2010 Session 2010).

The FCAA defines six criteria air pollutants that are considered harmful to human health and the environment. These pollutants include:

1. Carbon monoxide (CO)
2. Nitrogen oxides (NOx)
3. Sulfur dioxide (SO_2)
4. Ozone (O_3)
5. Particulate matter (PM_{10} and $PM_{2.5}$)
6. Lead (Pb)

The EPA has established NAAQS for each of these pollutants to protect public health and welfare. The NAAQS are reviewed periodically and updated as needed to reflect the latest scientific research on the health effects of air pollution. Primary federal standards are the necessary levels of air quality, with a reasonable margin of safety to protect the public health (Environmental Protection Agency 2022). States are required to develop SIPs to achieve and maintain the NAAQS in their respective areas.

Toxic Substances Control Act

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

State

The CARB is responsible for overseeing and coordinating state and local air pollution control programs in California. It is also tasked with implementing the CCAA of 1988. CARB's responsibilities include monitoring air quality in collaboration with air pollution control districts and air quality management districts, setting California Ambient Air Quality Standards (CAAQS), which are often more stringent than federal NAAQS, and establishing emissions standards for new motor vehicles. The CAAQS are summarized in Table 2. These vehicle emissions standards vary based on factors such as model year, vehicle type, fuel type, and engine specifications.

Table 2. Summary of Ambient Air Quality Standards

Pollutant	Average Time	California Standards	National Standards (Primary)
Ozone (O3)	1-hour	0.09 ppm (180 µg/m^3)	–
Ozone (O3)	8-hour	0.070 ppm (137 µg/m^3)	0.070 ppm
Particulate Matter (PM_{10})	AAM	20 µg/m^3	–
Particulate Matter (PM_{10})	24-hour	50 µg/m^3	150 µg/m^3
Fine Particulate Matter ($PM_{2.5}$)	AAM	12 µg/m^3	9.0 µg/m^3
Fine Particulate Matter ($PM_{2.5}$)	24-hour	No Standard	35 µg/m^3
Carbon Monoxide (CO)	1-hour	20 ppm (23 mg/m^3)	35 ppm (40 mg/m^3)
Carbon Monoxide (CO)	8-hour	9.0 ppm (10 mg/m^3)	9 ppm (10 mg/m^3)
Carbon Monoxide (CO)	8-hour (Lake Tahoe)	6 ppm (7 mg/m^3)	–
Nitrogen Dioxide (NO_2)	AAM	0.030 ppm (57 µg/m^3)	53 ppb (100 µg/m^3)
Nitrogen Dioxide (NO_2)	1-hour	0.18 ppm (339 µg/m^3)	100 ppb (188 µg/m^3)
Sulfur Dioxide (SO_2)	AAM	–	0.03 ppm (for certain areas)
Sulfur Dioxide (SO_2)	24-hour	0.04 ppm (105 µg/m^3)	0.14 ppm (for certain areas)
Sulfur Dioxide (SO_2)	3-hour	–	–
Sulfur Dioxide (SO_2)	1-hour	0.25 ppm (655 µg/m^3)	75 ppb (196 µg/m^3)
Lead	30-day Average	1.5 µg/m^3	–
Lead	Calendar Quarter	–	1.5 µg/m^3 (for certain areas)
Lead	Rolling 3-Month Average	–	0.15 µg/m^3
Sulfates	24-hour	25 µg/m^3	No Federal Standards
Hydrogen Sulfide	1-hour	0.03 ppm (42 µg/m^3)	No Federal Standards
Vinyl Chloride	24-hour	0.01 ppm (26 µg/m^3)	No Federal Standards
Visibility-Reducing Particle Matter	8-hour	Extinction coefficient: 0.23/kilometer-visibility of 10 miles or more (0.07-30 miles or more for Lake Tahoe)	No Federal Standards

µg/m^3 = micrograms per square meters *AAM = Annual Arithmetic Mean*
ppb = parts per billion *ppm= parts per million*

For more information visit: https://ww2.arb.ca.gov/sites/default/files/2024-08/AAQS%20Table_ADA_FINAL_07222024.pdf
Source: (California Air Resources Board 2024)

California Clean Air Act

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

1. visibility-reducing particulates,

2. hydrogen sulfide,
3. sulfates, and
4. vinyl chloride.

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

California Assembly Bill 170

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

Assembly Bills 1807 & 2588 - Toxic Air Contaminants

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

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

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

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

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

California Air Resources Board's Truck and Bus Regulation

In California, regulations mandate that fleets reduce emissions from diesel trucks and buses by retrofitting or replacing older engines. Amendments adopted in December 2010 provided fleets additional time to comply, requiring the installation of particulate matter (PM) filters starting January 1, 2012, and the replacement of older engines beginning January 1, 2015. By January 1, 2023, all vehicles were required to have engines from the 2010 model year or newer. These regulations apply to most diesel-fueled trucks and buses, including school buses, with a gross vehicle weight rating over 14,000 pounds. Provisions include credits for early PM filter installation before July 2011, delayed requirements for fleets with three or fewer vehicles, and specific considerations for agricultural vehicles (California Air Resoucres Board 2014).

Airborne Toxic Control Measure to Limit School Bus Idling at Schools

In July 2003, the CARB implemented an Airborne Toxic Control Measure (ATCM) to minimize idling emissions from school buses and other vehicles near educational institutions. This regulation mandates that drivers of school buses and certain other vehicles turn off their engines upon arriving at a school and restart them no more than 30 seconds before departure. Also, these drivers are prohibited from idling for over five consecutive minutes at locations beyond 100 feet of a school, such as bus stops or activity destinations. Exceptions are allowed when idling is necessary for health, safety, or operational reasons. Motor carriers are required to inform drivers about these idling restrictions and maintain records of compliance (California Air Resources Board n.d.).

San Joaquin Valley Air Pollution Control District

The SJVAPCD is responsible for ensuring that air quality standards are met and maintained within the SJVAB, where the proposed project is located. Its duties include preparing plans to achieve ambient air quality standards, adopting and enforcing regulations for air pollution sources, issuing permits for stationary sources, inspecting these sources and addressing citizen complaints, monitoring air quality and meteorological conditions, and implementing programs required by the FCAA and the CCAA (San Joaquin Valley Air Pollution Control District n.d.). The SJVAPCD Rules and Regulations that are applicable to the proposed project include, but are not limited to, the following:

- **Regulation VIII (Fugitive Dust Prohibitions).** Regulation VIII (Rules 8011-8081). This regulation is a series of rules designed to reduce particulate emissions generated by human activity, including construction and demolition activities, carryout and trackout, paved and unpaved roads, bulk material handling and storage, unpaved vehicle/traffic areas, open space areas, etc. (San Joaquin Valley Air Pollution Control District 2004).
- **Rule 4002 (National Emissions Standards for Hazardous Air Pollutants).** This rule may apply to projects in which portions of an existing building would be renovated, partially demolished or removed. Regarding asbestos, the NESHAP specifies work practices to be followed during renovation, demolition or other abatement activities when friable asbestos is involved. Prior to demolition activity, an asbestos survey of the existing structure may be required to identify the presence of any asbestos containing building materials (ACBM). Removal of identified ACBM must be removed by a certified asbestos contractor in accordance with CAL-OSHA requirements (San Joaquin Valley Air Pollution Control District 2007).

- **Rule 4102 (Nuisance).** Applies to any source operation that emits or may emit air contaminants or other materials (San Joaquin Valley Air Pollution Control District 1992).
- **Rule 4601 (Architectural Coatings).** Limits volatile organic compounds from architectural coatings (San Joaquin Valley Air Pollution Control District 2020).
- **Rule 4641 (Cutback, Slow Cure, and Emulsified Asphalt, Paving and Maintenance Operations).** This rule applies to the manufacture and use of cutback, slow cure, and emulsified asphalt during paving and maintenance operations (San Joaquin Valley Air Pollution Control District 1992).
- **Rule 9510 (Indirect Source Review - ISR).** Requires developers of larger residential, commercial, recreational, and industrial projects to reduce smog-forming and particulate emissions from their projects' baselines. If project emissions still exceed the minimum baseline reductions, a project's developer will be required to mitigate the difference by paying an off-site fee to the District, which would then be used to fund clean-air projects. For projects subject to this rule, the ISR rule requires developers to mitigate and/or offset emissions sufficient to achieve: (1) 20-percent reduction of construction equipment exhaust NOx; (2) 45-percent reduction of construction equipment exhaust PM_{10}; (3) 33-percent reduction of operational NOx over 10 years; and (4) 50-percent reduction of operational PM_{10} over 10 years. SJVAPCD ISR applications must be filed "no later than applying for a final discretionary approval with a public agency" (San Joaquin Valley Air Pollution Control District 2017).

Regulatory Attainment Designations

Under the CCAA, the CARB is responsible for designating areas in the state based on air quality status in relation to specific standards. Areas are designated as "attainment" if pollutant concentrations meet the standards, and as "nonattainment" if pollutant concentrations exceed the standards at least once, excluding those violations caused by exceptional events. Nonattainment areas are further categorized as serious, severe, or extreme, depending on the frequency and severity of violations. An "unclassified" designation is used when data does not support either attainment or nonattainment status. The CCAA establishes increasingly stringent control measures for areas based on these classifications. Similarly, the EPA classifies areas for pollutants like ozone, CO, NO_2, and SO_2, but the terminology used by CARB (attainment, nonattainment, unclassified) is more commonly referenced. The EPA also uses subcategories for nonattainment status, including serious, severe, and extreme.

The state and national attainment status designations pertaining to the SJVAB are summarized in Table 3. The SJVAB is currently designated as a nonattainment (extreme) with respect to the state 1-hour ozone, 8-hour ozone, $PM_{2.5}$, and PM_{10} standards. The SJVAB is designated nonattainment for the national, 8-hour ozone and $PM_{2.5}$ standards (San Joaquin Valley Air Pollution Control District n.d.).

Table 3. SJVAB Attainment Status Designation

Pollutant	Federal Designation	State Designation
Ozone, 1 hour	No Standard	Nonattainment/Severe
Ozone, 8 hour	Nonattainment/Extreme	Nonattainment
PM_{10}	Attainment	Nonattainment
$PM_{2.5}$	Nonattainment	Nonattainment
Carbon Monoxide	Attainment/Unclassified	Attainment/Unclassified
Nitrogen dioxide	Attainment/Unclassified	Attainment

Sulfur dioxide	Attainment/Unclassified	Attainment
Lead (particulate)	No Designation/Classification	Attainment
Hydrogen sulfide	No Federal Standard	Unclassified
Sulfates	No Federal Standard	Attainment
Visibility-reducing particulates	No Federal Standard	Unclassified
Vinyl Chloride	No Federal Standard	Attainment
For more information visit website url: https://ww2.valleyair.org/air-quality-information/ambient-air-quality-standards-valley-attainmnet-status/ *Source:* (San Joaquin Valley Air Pollution Control District n.d.)		

Ambient Air Quality

Air pollutant concentrations are measured at the Fresno Drummond air monitoring station. This monitoring station monitors ambient concentrations of ozone, nitrogen dioxide, PM_{10}, and $PM_{2.5}$. Ambient monitoring data was obtained for the last three years of available measurement data (i.e., 2023 through 2025) and are summarized in Table 4. As depicted, the state and national standards for ozone, PM_{10}, and $PM_{2.5}$ were exceeded on numerous occasions over the past 3 years.

Sensitive Receptors

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

Sensitive land uses near the proposed project site consist of the Norseman Elementary School site itself and nearby Ericson Elementary School, Basin Park V, several churches, a medical clinic, and surrounding residential land uses.

Table 4. Summary of Ambient Air Quality Monitoring Data

Air Pollutant	Averaging Time	Item	2023	2024	2025
Ozone	1 Hour	Max 1 Hour	0.102*	0.109*	0.101*
Ozone	1 Hour	Days > State Standard (0.09 ppm)	7	13	5
Ozone	8 Hour	Max 8 Hour	0.088*	0.085*	0.083*
Ozone	8 Hour	Days > State Standard (0.07 ppm)	20	35	11
Ozone	8 Hour	Days > National Standard (0.075 ppm)	12	18	7
Carbon monoxide	8 Hour	Max 8 Hour (ppm)	ND	ND	ND
Carbon monoxide	8 Hour	Days > State Standard (9.0 ppm)	ND	ND	ND
Carbon monoxide	8 Hour	Days > National Standard (9 ppm)	ND	ND	ND
Nitrogen dioxide	Annual	Annual Average (ppm)	0.010	0.010	0.009
Nitrogen dioxide	1 Hour	Max 1 Hour (ppm)	0.058	0.059	0.057
Nitrogen dioxide	1 Hour	Days > State Standard (0.18 ppm)	0	0	0
Sulfur dioxide	Annual	Annual Average (ppm)	0.0004	0.0006	0.0004
Sulfur dioxide	24 Hour	Max 24 Hour (ppm)	0.002	0.002	0.002
Sulfur dioxide	24 Hour	Days > State Standard (0.04 ppm)	0	0	0
Inhalable coarse particles (PM_{10})	Annual	Annual Average (µg/m^3)	43.77	44.61	38.93
Inhalable coarse particles (PM_{10})	24 Hour	24 Hour Maximum (µg/m^3)	131.1	182.0	104.5
Inhalable coarse particles (PM_{10})	24 Hour	Days > State Standard (50 µg/m^3)	122	117	83
Inhalable coarse particles (PM_{10})	24 Hour	Days > National Standard (150 µg/m^3)	0	3	0
Fine Particulate Matter ($PM_{2.5}$)	Annual	Annual Average (µg/m^3)	12.38	13.24	11.13
Fine Particulate Matter ($PM_{2.5}$)	24 Hour	24 Hour Maximum (µg/m^3)	51.3*	57.2*	42.9*
Fine Particulate Matter ($PM_{2.5}$)	24 Hour	Days > National Standard (35 µg/m^3)	7	8	3

Notes and Abbreviations:
> = exceed
ppm = parts per million
µg/m^3 = micrograms per cubic meter
ID = insufficient data
ND = no data
max = maximum
* = exceedance
State Standard = California Ambient Air Quality Standard National Standard = National Ambient Air Quality Standard
[1] Data from Fresno - Drummond Monitoring Station (California Air Resources Board n.d.)

Impacts & Mitigation Measures

Methodology

Short-term (construction) and long-term (operational) emissions that would result from the project were estimated using the CalEEMod version 2022.1.1.43 web-based platform. Conceptual proposed site plans are analyzed as the maximum reasonably foreseeable scope and intensity of development that could occur under the conceptual plan to ensure that any environmental effects are fully disclosed, even if minor design modifications occur.

Short-term Impacts

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

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

Construction of Phase 1 is expected to commence in June 2028 and conclude in August 2029. Construction of Phase 2 is expected to commence in June 2029 and conclude in August 2029. Incorporating these refined construction schedules ensures a more accurate representation of the anticipated construction timeline while preserving consistency with CalEEMod's standard equipment and operational assumptions.

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

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

Long-term Impacts

Operational emissions were evaluated for the anticipated year of operation in 2029.

Because the project consists of replacement facilities on an existing elementary school campus, no increase in student capacity, staffing, enrollment, or daily use would occur compared to existing

conditions. As a result, the project would not generate additional vehicle trips beyond existing baseline activity levels. To reflect this condition, all mobile-source trip rates and associated vehicle-related operational emissions in CalEEMod were set to zero. This approach is consistent with CEQA practice for replacement-in-kind public-facility projects that do not introduce new operational activity. Based on these assumptions, the project would not result in any net increase in mobile-source operational emissions.

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

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

All model inputs, assumptions, and CalEEMod output files are included in Appendix A of this report for reference.

Thresholds of Significance

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

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

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

- Short-term Emissions—Construction impacts associated with the proposed project would be considered significant if project-generated emissions would exceed 100 tons per year (TPY) of CO, 10 TPY of ROG or NOx, 27 TPY of SOx, or 15 TPY of PM_{10} or $PM_{2.5}$.
- Long-term Emissions—Operational impacts associated with the proposed project would be considered significant if project generated emissions would exceed 100 TPY of CO, 10 TPY of ROG or NOx, 27 TPY of SOx, or 15 TPY of PM_{10} or $PM_{2.5}$.
- Conflict with or Obstruct Implementation of Applicable Air Quality Plan—Due to the region's non-attainment status for ozone, $PM_{2.5}$, and PM_{10}, if project-generated emissions of ozone precursor

pollutants (i.e., ROG and NOx) or PM would exceed the SJVAPCD's significance thresholds, then the project would be considered to conflict with the attainment plans.

- Local Mobile-Source CO Concentrations—Local mobile source impacts associated with the proposed project would be considered significant if the project contributes to CO concentrations at receptor locations in excess of the CAAQS (i.e., 9.0 ppm for 8 hours or 20 ppm for 1 hour).
- Exposure to TACs would be considered significant if the probability of contracting cancer for the Maximally Exposed Individual (i.e., maximum individual risk) would exceed 20 in 1 million or would result in a Hazard Index greater than 1.
- Odor impacts associated with the proposed project would be considered significant if it could frequently expose members of the public to objectionable odors.

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

Project Impacts

Impact AQ-A.	***Would the project conflict with or obstruct implementation of the applicable air quality plan?***

In accordance with SJVAPCD-recommended methodology for the assessment of air quality impacts, projects that result in significant air quality impacts at the project level are also considered to have a significant cumulative air quality impact. As noted in Impact AQ-B, short-term construction and long-term operational emissions would not exceed applicable thresholds. In addition, the proposed project would not result in a significant increase in vehicle miles traveled (VMT) and would not be inconsistent with the Fresno Council of Government's (FCOG's) 2022 Regional Transportation Plan and Sustainable Communities Strategies (Fresno Council of Governments 2022). efforts. For these reasons, the proposed project's implementation would not conflict with air quality attainment or maintenance planning efforts. This impact would be considered **less than significant**.

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

The following sections discuss the short-term construction and long-term operational air quality impacts associated with the project:

Short-term Construction Emissions

During construction, temporary increases in air pollutant emissions would occur. Although construction-related emissions are short-term and limited to the duration of construction activities, they can result in significant air quality impacts. The proposed project's construction would temporarily generate emissions

from site grading, excavation, paving, painting, exhaust from construction equipment and worker trips, as well as the movement of equipment on unpaved surfaces. These activities would lead to increased emissions of ozone precursors (ROG and NOx) and particulate matter (PM). Ozone precursor emissions would primarily come from on-road and off-road vehicles and equipment, while PM emissions would depend on the extent of ground disturbance during grading and excavation, potentially affecting nearby sensitive land uses. Estimated annual construction emissions for the proposed project alternatives are presented in Table 5.

As shown in Table 5, the maximum uncontrolled annual emissions from project construction are estimated at 0.19 TPY of ROG, 0.79 TPY of NOx, 1.04 TPY of CO, <0.005 TPY of SO_2, 0.07 TPY of $PM_{10}T$, and 0.04 TPY of $PM_{2.5}T$. These emissions would remain below the SJVAPCD's significance thresholds of 10 TPY for ROG and NOx, 100 TPY for CO, 27 TPY for SO_2, and 15 TPY for $PM_{10}T$ and $PM_{2.5}T$.

Table 5. Annual Construction Emissions (Unmitigated)

	Annual Average Emissions (TPY)[1]							
Construction Phase	**ROG**	**NO_X**	**CO**	**SO_2**	**$PM_{10}E$**	**$PM_{10}D$**	**$PM_{10}T$**	**$PM_{2.5}T$**
Phase 1								
Construction Year 2028	0.09	0.78	0.97	<0.005	0.03	0.04	0.07	0.04
Construction Year 2029	0.15	0.61	0.82	<0.005	0.02	0.01	0.02	0.02
Phase 2								
Construction Year 2029	0.04	0.18	0.22	<0.005	0.01	0.03	0.04	0.02
Phase 1 and 2 Construction Year 2029 Totals	0.19	0.79	1.04	<0.005	0.03	0.04	0.07	0.04
Maximum Annual Average Emissions:	0.19	0.79	1.04	<0.005	0.03	0.04	0.06	0.04
Significance Thresholds:	*10*	*10*	*100*	*27*	*N/A*	*N/A*	*15*	*15*
Exceeds Thresholds/Significant Impact?:	*No*	*No*	*No*	*No*	*N/A*	*N/A*	*No*	*No*

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

Estimated maximum-daily on-site construction emissions are summarized in Table 6. As noted in Table 6, construction of the proposed project would generate maximum on-site emissions of approximately 13.35 lbs/day of ROG, 12.17 lbs/day of NOx, 14.46 lbs/day of CO, 0.03 lbs/day of SO_2, 7.62 lbs/day of $PM_{10}T$, and 3.90 lbs/day of $PM_{2.5}T$. Daily on-site construction emissions would not exceed the SJVAPCD's recommended localized ambient air quality significance thresholds of 100 lbs/day for any of the criteria pollutants.

Table 6. Daily On-Site Construction Emissions (Unmitigated)

	Maximum Daily On-Site Emissions (lb/day)[1]							
Construction Phase	**ROG**	**NO_X**	**CO**	**SO_2**	**$PM_{10}E$**	**$PM_{10}D$**	**$PM_{10}T$**	**$PM_{2.5}T$**
Phase 1								
Demolition	1.33	12.17	14.46	0.02	0.45	0.35	0.80	0.46
Site Preparation	1.05	8.42	10.71	0.03	0.36	0.50	0.86	0.50
Grading	1.35	11.78	13.90	0.02	0.52	7.10	7.62	3.90
Building Construction (2028)	1.08	9.23	11.67	0.02	0.28	0.00	0.28	0.26
Building Construction (2029)	1.04	8.89	11.61	0.02	0.26	0.00	0.26	0.24
Paving	0.93	5.42	8.19	0.01	0.19	0.00	0.19	0.17
Architectural Coating	13.35	0.79	1.11	<0.005	0.01	0.00	0.01	0.01
Phase 2								
Demolition (2029)	1.30	11.60	14.37	0.02	0.42	1.26	1.68	0.58
Site Preparation	1.01	7.76	10.61	0.03	0.33	0.75	1.08	0.47
Grading	1.31	11.06	13.83	0.02	0.48	6.92	7.40	3.87
Paving	1.44	5.42	8.19	0.01	0.19	0.00	0.19	0.17
Architectural Coating	4.47	0.79	1.11	<0.005	0.01	0.00	0.01	0.01
Maximum Daily On-site Emissions:	13.35	12.17	14.46	0.03	0.52	7.10	7.62	3.90
Significance Thresholds:	*100*	*100*	*100*	*100*	*N/A*	*N/A*	*100*	*100*
Exceeds Thresholds/Significant Impact?:	*No*	*No*	*No*	*No*	*N/A*	*N/A*	*No*	*No*

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

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

Long-term Operational Emissions

Table 7 summarizes the estimated increase of annual operational emissions for the proposed project compared to existing operation of the project site. Upon completion of the project (Phase 1 and 2), the project is expected to generate approximately 0.14 TPY of ROG, 0.06 TPY of NOx, 0.16 TPY of CO, and <0.005 TPY of SO_2, <0.005 TPY of $PM_{10}T$, and <0.005 TPY of $PM_{2.5}T$. These emissions would primarily result from building operations (including energy use), and area sources such as occasional use of cleaning products, architectural coatings, and maintenance activities. Operational emissions from the project in 2029 would remain below SJVAPCD's mass-emissions significance thresholds.

Table 7. Annual Long-term Operational Emissions (Unmitigated)

	Annual Operational Emissions (TPY)[1]					
Operational Phase/Year	**ROG**	**NO_X**	**CO**	**SO_2**	**$PM_{10}T$**	**$PM_{2.5}T$**
Phase 1: 2028						
Mobile Source	0.00	0.00	0.00	0.00	0.00	0.00
Natural Gas	<0.005	0.06	0.05	<0.005	<0.005	<0.005
Area Source	0.14	<0.005	0.11	<0.005	<0.005	<0.005
Energy Use	0.00	0.00	0.00	0.00	0.00	0.00
Total:	0.14	0.06	0.16	<0.005	<0.005	<0.005
Significance Thresholds (tons per year):	*10*	*10*	*100*	*27*	*15*	*15*
Exceeds Thresholds/Significant Impact?:	*No*	*No*	*No*	*No*	*No*	*No*
Phase 2: 2029						
Mobile Source	0.00	0.00	0.00	0.00	0.00	0.00
Natural Gas	0.00	0.00	0.00	0.00	0.00	0.00
Area Source	<0.005	0.00	0.00	0.00	0.00	0.00
Energy Use	0.00	0.00	0.00	0.00	0.00	0.00
Total:	<0.005	0.00	0.00	0.00	0.00	0.00
Significance Thresholds (tons per year):	*10*	*10*	*100*	*27*	*15*	*15*
Exceeds Thresholds/Significant Impact?:	*No*	*No*	*No*	*No*	*No*	*No*
TOTAL: Phase 1 and 2, 2029						
Mobile Source	0.00	0.00	0.00	0.00	0.00	0.00
Natural Gas	<0.005	0.06	0.05	<0.005	<0.005	<0.005
Area Source	0.14	<0.005	0.11	<0.005	<0.005	<0.005
Energy Use	0.00	0.00	0.00	0.00	0.00	0.00
Total:	0.14	0.06	0.16	<0.005	<0.005	<0.005
Significance Thresholds (tons per year):	*10*	*10*	*100*	*27*	*15*	*15*
Exceeds Thresholds/Significant Impact?:	*No*	*No*	*No*	*No*	*No*	*No*

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

Table 8 summarizes the estimated increase of maximum daily on-site operational emissions compared to existing project site operations. As mentioned, maximum daily emissions would primarily stem from area sources, such as landscape maintenance activities and the use of consumer products. Upon completion of the project (Phase 1 and 2), maximum daily on-site emissions are estimated at 0.89 lbs/day of ROG, 0.36 lbs/day of NOx, 1.53 lbs/day of CO, <0.005 lbs/day of SO_2, 0.03 lbs/day of $PM_{10}T$, and 0.03 lbs/day of $PM_{2.5}T$.

Table 8: Daily Long-term Operational Emissions (Unmitigated)

	Maximum Unmitigated Daily Emissions (lb/day)[1]					
Operational Phase/Year	**ROG**	**NO_X**	**CO**	**SO_2**	**$PM_{10}T$**	**$PM_{2.5}T$**

Phase 1: 2028						
Mobile Source	0.00	0.00	0.00	0.00	0.00	0.00
Area Source	0.86	0.01	1.24	<0.005	<0.005	<0.005
Energy	0.02	0.35	0.29	<0.005	0.03	0.03
Total:	0.88	0.36	1.53	<0.005	0.03	0.03
Significance Thresholds (lbs/day):	*100*	*100*	*100*	*100*	*100*	*100*
Exceeds Thresholds/Significant Impact?:	*No*	*No*	*No*	*No*	*No*	*No*
Phase 2: 2029						
Mobile Source	0.00	0.00	0.00	0.00	0.00	0.00
Area Source	0.00	0.00	0.00	0.00	0.00	0.00
Energy	0.01	0.00	0.00	0.00	0.00	0.00
Total:	0.01	0.00	0.00	0.00	0.00	0.00
Significance Thresholds (lbs/day):	*100*	*100*	*100*	*100*	*100*	*100*
Exceeds Thresholds/Significant Impact?:	*No*	*No*	*No*	*No*	*No*	*No*
TOTAL: Phase 1 and 2, 2029						
Maximum Daily On-Site Operational Emissions:	0.89	0.36	1.53	<0.005	0.03	0.03
Significance Thresholds (lbs/day):	*100*	*100*	*100*	*100*	*100*	*100*
Exceeds Thresholds/Significant Impact?:	*No*	*No*	*No*	*No*	*No*	*No*

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

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

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

Impact AQ-C.	***Would the project expose sensitive receptors to substantial pollutant concentrations?***

Sensitive land uses near the proposed project site consist mainly of education and residential land uses. The nearest educational land use is located south of the project site, and residential land uses are located to the southwest of the project site. Long-term operational and short-term construction activities and emission sources that could adversely impact these nearest sensitive receptors are discussed, as follows:

Long-term Operation

Toxic Air Contaminants

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

Carbon Monoxide

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

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

Landscape Maintenance Equipment

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

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

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

Short-term Construction

Naturally Occurring Asbestos

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

Asbestos-Containing Materials

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

In accordance with these regulatory requirements, the District conducted a hazardous building materials survey of all buildings proposed for demolition at the project site. The survey, prepared by Forensic Analytical Consulting Services (FACS), identified non-friable asbestos-containing materials in all permanent buildings and portable buildings, including roofing, window putty, seam and siding sealant, plaster, door frame sealant, exterior stucco, drywall, plaster, boiler insulation, transite pipe, and spray foam roofing (FACS 2026).

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

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

Lead-Coated Materials

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

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

The District evaluated the presence of lead-containing building materials through a hazardous building materials survey conducted by Forensic Analytical Consulting Services (FACS). The survey identified lead-based paint on select surfaces within Buildings H, J, K, and P4 (FACS 2026). Demolition of these structures could result in limited disturbance of lead-containing materials; however, all demolition activities would be conducted in accordance with applicable federal and state regulations governing the identification, handling, containment, transportation, and disposal of lead-containing materials, including the OSHA Lead in Construction Standard (29 CFR 1926.62) and California Code of Regulations, Title 8, Section 1532.1. In addition, demolition debris containing lead would be properly managed and disposed of in accordance with applicable federal, state, and local requirements.

Compliance with these mandatory regulations, together with required demolition and dust-control practices, would minimize the potential for lead-containing dust to become airborne and migrate off site. Any potential lead emissions would be temporary, localized, and limited to the demolition period. As a result, the project would not create a substantial toxic air contaminant exposure or health hazard for nearby sensitive receptors. Consistent with the intent of the Air Toxics "Hot Spots" program to evaluate localized health risk from toxic air contaminants, the project would not result in a substantial increase in toxic air contaminant emissions or associated cancer or noncancer health risks related to lead. Therefore, impacts related to lead-containing materials during demolition would be **less than significant**.

Localized PM Concentrations

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

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

6. Covering or stabilizing all haul trucks transporting bulk materials.
7. Reducing vehicle speeds on unpaved areas and restricting unauthorized access.

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

Localized Diesel Particulate Matter

Construction activities would involve the use of off-road construction equipment and on-road diesel trucks, which would generate short-term emissions of diesel particulate matter (DPM). These emissions could result in elevated localized DPM concentrations in proximity to nearby sensitive receptors. Elevated short-term localized concentrations of DPM have the potential to result in adverse health effects; therefore, construction-related DPM emissions warrant further evaluation through a screening-level health risk prioritization analysis.

Prioritization (Screening Health Risk Assessment) Construction Diesel Particulate Matter (DPM)

This Prioritization (Screening Health Risk Assessment [HRA]) provides a screening analysis for potential cancer risks associated with construction-related diesel particulate matter (DPM) emissions from the proposed project. This analysis uses a modified version of the California Air Pollution Control Officers Association (CAPCOA) *Facility Prioritization Guidelines* (2016), which provides a conservative screening-level methodology to classify projects as low, intermediate, or high priority for health risk evaluation. Standard CAPCOA methodology provides a screening level evaluation, assuming 70 years of exposure, while this Prioritization considers the limited exposure duration to project emissions of 15 months.

Under standard CAPCOA methodology:

- A total score less than 1 indicates low priority, where a score of 1 indicates a 10 in one million cancer risk.
- A score between 1 and 10 indicates intermediate priority, where a score of 10 indicates a 100 in one million cancer risk.
- A score between 10 and 100 indicates high priority, where a score of 100 indicates a 1,000 in one million cancer risk.

Projects that score as intermediate or high priority may warrant preparation of a more detailed, site-specific health risk assessment. This Prioritization focuses exclusively on construction-related diesel particulate matter (DPM), represented as exhaust particulate matter ($PM_{10}E$) emitted from off-road construction equipment and on-road diesel support vehicles. Operational DPM emissions were not analyzed because the project would continue operation at the same capacity as the existing campus, with no increase in use or intensity.

Fugitive dust generated from soil disturbance (non-exhaust particulate matter) is not considered a toxic air contaminant and does not contribute to cancer risk. Therefore, fugitive dust is addressed separately under criteria air pollutants ($PM_{10}T$ and $PM_{2.5}T$) in the project's air quality impact analysis.

No other carcinogenic or non-carcinogenic air toxics were evaluated because the project would not emit additional toxic air contaminants listed in Appendix B of the CAPCOA *Facility Prioritization Guidelines* (2016). Accordingly, this Prioritization considers construction-related $PM_{2.5}E$ emissions as a surrogate for DPM.

Prioritization Methodology

Consistent with the CAPCOA Facility Prioritization Guidelines (2016), the following equation was used to calculate the total facility score (TS) (CAPCOA 2016):

$$TS = \left\{\sum^{C}(E_C)(P_C)\right\}(RP)(7.7 \times 10^3)$$

Where:

- TS = total facility score, the sum of scores for all substances with carcinogenic effects.
- C = specific carcinogenic substance (in this case DPM from Phases 1 and 2)
- E_C = emissions of C (lbs/year)
- P_C = Unit risk of C
- RP = receptor proximity adjustment factor
- 7.7×10^3 = CAPCOA normalization factor

Emission Basis

Construction-related DPM emissions were obtained from CalEEMod modeling for each construction phase. Average daily emissions were converted to annualized emissions for use in the prioritization analysis. Detailed CalEEMod outputs are provided in Appendices A.1 and A.2.

Annual $PM_{10}E$ emissions were modeled to be 52.32 lbs/year in 2028 and 48.58 lbs/year in 2029. The total lbs of $PM_{10}E$ from the project would be 100.90 lbs over a 15-month duration. To complete a conservative Prioritization analysis, this value was used as lbs per year, to slightly overestimate project emission rates and consider emissions as one continuous duration. $PM_{10}E$ emissions per year, per phase, and resulting totals, are presented Table 9 below.

Table 9: Annual $PM_{2.5}E$ Emissions per Phase and Per Year

	2028 $PM_{10}E$ Emissions (lbs/year)	2029 $PM_{10}E$ Emissions (lbs/year)	Total $PM_{10}E$ Emissions (lbs/phase)
Phase 1	52.32	35.84	88.16
Phase 2	-	12.74	12.74
Total $PM_{2.5}E$ Emissions (lbs/year)	**52.32**	**48.58**	
Total lbs of $PM_{2.5}E$ Emissions	**100.90**		
See Appendices A.1 and A.2 for source CalEEMod model results. *Annual tons per year from CalEEMod multiplied by 2,000 to convert to pounds.*			

Unit Risk

The California Office of Environmental Health Hazard Assessment (OEHHA) has identified diesel particulate matter (DPM) as a toxic air contaminant with an inhalation unit cancer risk factor of 3.0 × 10^{-4} per microgram per cubic meter (µg/m^3) (OEHHA n.d.). This unit risk factor was used to calculate cancer risk for purposes of this health risk prioritization.

Receptor Proximity

Construction-related DPM emissions would be generated by multiple mobile sources operating at varying distances from nearby sensitive student and residential receptors across the three construction phases. Some emission sources would operate within approximately 50 feet of sensitive receptors, while others would be located farther away.

To maintain a conservative screening approach, a receptor proximity factor of 1.0 was applied, which provides no reduction for distance and assumes close proximity between emission sources and receptors.

Normalization Factor

The normalization factor of 7.7 × 10^3 is used to provide a scoring result in a more convenient scale.

Standard Prioritization Calculation Results

The products of annualized DPM emissions (E_C) and the DPM unit risk (P_C) were calculated for one construction year and then multiplied by the receptor proximity factor and normalization factor to calculate the total facility score (TS) for the project. This calculation, condensing 15 months of construction DPM emissions into one year from both Phase 1 and Phase 2, yields a total facility score of 233.08, which is considered high, using standard CAPCOA methodology. These calculations and results are presented below in Table 10.

Table 10: Prioritization Calculation Results

	$PM_{10}E$ Emissions (lbs/year)		Unit Risk		Receptor Proximity		Norm. Factor		Total Facility Score
Total lbs $PM_{2.5}E$	100.90	x	0.0003	x	1	x	7700	=	**233.08**

Modified Prioritization Analysis

The CAPCOA *Facility Prioritization Guidelines* (2016) were developed to provide a screening-level methodology for evaluating health risks from long-term operational sources, assuming continuous exposure over a 70-year lifetime. Because construction emissions from the proposed project would occur over a limited duration (approximately 15 months), direct application of the standard methodology would substantially overestimate potential health risk.

To better reflect the temporary nature of construction emissions while maintaining a conservative screening approach, the calculated Total Facility Score (TS) was adjusted to account for the reduced

exposure duration. Specifically, an exposure adjustment factor of 1.79 percent (15 months divided by 840 months, representing a 70-year lifetime) was applied to the unadjusted TS of 233.08. This adjustment yields a **Modified Total Facility Score of 4.16.**

This modified score remains conservative for several reasons. First, it assumes continuous emissions throughout the 15-month period rather than accounting for the intermittent nature of construction activities. Second, it conservatively assumes full-time receptor exposure, even though sensitive receptors (e.g., students) would not be present during portions of the construction schedule, including intentionally planned intensive activities occurring during summer break periods.

Localized Diesel Particulate Matter Conclusion

Under standard CAPCOA prioritization methodology, the project would screen as high priority; however, that framework assumes continuous exposure over a 70-year lifetime and would substantially overestimate risk for short-term construction activities. When adjusted to reflect the temporary 15-month construction duration, the Modified Total Facility Score would be approximately 4.16, which falls at the low end of the intermediate range and is representative of a low-priority screening outcome given the conservative assumptions applied.

Considering (1) the short-term and intermittent nature of construction emissions, (2) the conservative assumptions inherent in the screening methodology and exposure adjustment, and (3) reduced receptor presence during portions of construction (summer break), construction-related DPM emissions would not expose sensitive receptors to a substantial cancer risk.

Therefore, impacts associated with construction-generated toxic air contaminants would be **less than significant**, and preparation of a refined, site-specific health risk assessment would not be warranted.

Volatile Organic Compounds (VOCs)

Construction activities associated with the proposed project would generate emissions of volatile organic compounds (VOCs), primarily from the use of asphalt materials during paving and maintenance activities and from the application of architectural coatings, such as paints, varnishes, sealers, and stains applied to building surfaces, curbs, and pavements. VOCs contribute to the formation of ozone, a regional air pollutant of concern in the San Joaquin Valley Air Basin.

The project would be required to comply with applicable San Joaquin Valley Air Pollution Control District (SJVPACD) rules designed to limit VOC emissions from construction-related sources. Asphalt paving and maintenance activities would be subject to the District rule regulating the manufacture and use of cutback, slow-cure, and emulsified asphalt. This rule limits the VOC content of asphalt materials and restricts the use of higher-VOC asphalt types, thereby reducing VOC emissions associated with paving operations. Compliance with this rule would ensure that asphalt materials used during project construction meet District VOC content limits and handling requirements.

In addition, the project would be subject to SJVPACD Rule 4601 (Architectural Coatings), which applies to the use of architectural coatings during construction. Architectural coatings include paints, varnishes,

lacquers, sealers, and stains applied to structures, portable buildings, pavements, or curbs. Rule 4601 limits the allowable VOC content of architectural coatings and establishes requirements for proper storage, labeling, handling, and cleanup to minimize VOC emissions. The project would be constructed using architectural coatings that comply with Rule 4601 VOC limits, and all coating application, storage, and disposal activities would be conducted in accordance with District requirements.

Compliance with these District rules is mandatory and enforceable, and implementation would substantially reduce construction-related VOC emissions compared to uncontrolled conditions. As a result, while short-term VOC emissions would occur during construction, adherence to SJVPACD regulations governing asphalt materials and architectural coatings would minimize VOC emissions and reduce the project's contribution to ozone formation.

Therefore, construction-related VOC emissions associated with the proposed project would comply with applicable air quality regulations and would not result in a significant adverse impact on air quality. This impact would be considered **less than significant.**

Impact AQ-D.	***Would the project result in other emissions (such as those leading to odors) affecting a substantial number of people?***

According to the SJVAPCD GAMAQI (San Joaquin Valley Air Pollution Control District 2015), due to the subjective nature of odor impacts, the number of variables that can influence the potential for an odor impact, and the variety of odor sources, there are no quantitative or formulaic methodologies to determine the presence of a significant odor impact. Rather, SJVAPCD recommends that odor analyses strive to fully disclose all pertinent information. The intensity of an odor source's operations and its proximity to sensitive receptors influence the potential significance of odor emissions. SJVAPCD has identified some common types of facilities that have been known to produce odors in the San Joaquin Valley.

During construction, the project may produce odors associated with construction, such as vehicle exhaust odor, asphalt degassing, and paint fumes, although these odors are expected to be intermittent and would no longer be present once construction is complete.

Long-term operation of the project would not introduce any new sources of objectionable odors, and would continue to operate in the same manner as the existing school site.

As stated above, the project would not produce significant odors that would adversely affect a substantial number of people. This impact would be **less than significant**.

Greenhouse Gasses and Climate Change

Existing Setting

Climate change refers to changes to typical weather patterns of the Earth, which can be evaluated by observing alterations in temperature, precipitation, wind patterns, and storms. These changes are assessed by comparing current data to historical records, such as those from past ice ages. The concerns regarding climate change are based on statistical analyses that focus on temperature records from the Industrial Age, which have shown a significant difference in rate and magnitude compared to previous climate changes over the last 150 years.

The United Nations Intergovernmental Panel on Climate Change (IPCC) report, released in August 2021, determined that human activities, particularly the emission of greenhouse gases, are unequivocally responsible for the significant warming observed on the planet since the mid-1800s. The report states that the current rate of warming is unprecedented in at least the last 2,000 years and longer.

The report also highlights that the effects of climate change are already being felt around the world, including more frequent and intense heatwaves, wildfires, and extreme weather events. It warns that the impacts of climate change will continue to worsen, even if nations manage to limit global warming caused by greenhouse gas emissions to 1.5°C above preindustrial levels, the most ambitious goal of the Paris Agreement.

To limit the worst impacts of climate change, the report recommends urgent and ambitious action to reduce greenhouse gas emissions, including a rapid and deep reduction in the use of fossil fuels, the protection and restoration of forests and other natural ecosystems, and the adoption of sustainable land-use practices (IPCC 2021).

Figure 10. Historical Temperature Changes

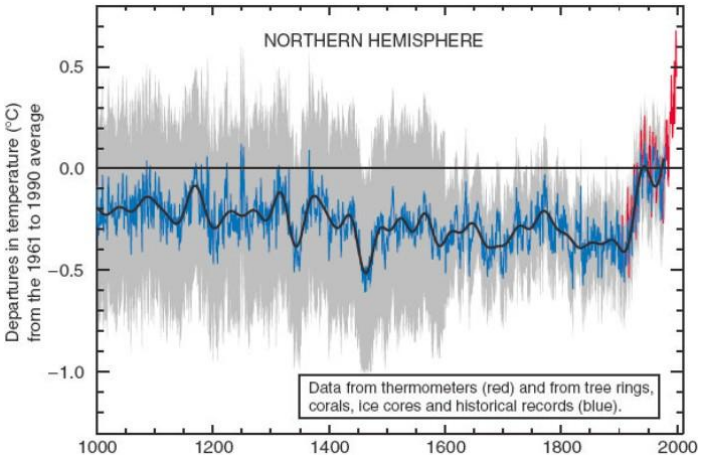


Figure 9: A line graph showing average northern hemisphere temperatures from 1000 AD to 2000 AD. The line starts at -0.2° Celsius at 1000 AD, trending downward to approximately -0.4° Celsius in 1900 AD and then trends upward rapidly to +0.07° Celsius in 2000 AD.

Consequences of Climate Change in California

In California, climate change may result in consequences such as the following:

- **A reduction in the quality and supply of water from the Sierra snowpack.** In California, the Sierra Nevada snowpack is the primary natural water reservoir and plays a crucial role in meeting the state's water needs (California Department of Water Resources 2025). The snowpack is typically formed during the fall and winter months and gradually releases around 15 million acre-feet of water during the spring and summer when water is most needed. The state's dams and water storage systems were designed to manage the gradual melting of the snowpack, as it has happened in the past. However, rising temperatures are causing the snowpack to melt earlier and more rapidly. This premature and more substantial melting can pose a risk of flooding and water shortages as it could overwhelm the state's water storage facilities (California Office of Environmental Health and Hazard Assessment 2024).
- **Increased risk of large wildfires.** More than 80% of California's 100 million acres are covered by forests and rangelands, which are at risk of being impacted by climate change. Changes in temperature and precipitation patterns could impact the growth and survival of trees, leading to reduced productivity and altered habitats. Additionally, climate change could increase the risk of wildfires in these areas by making forests and vegetation drier due to rising temperatures. Compared to previous decades, the fire season in the western United States now starts earlier, lasts longer, and is more intense. By the end of the century, the occurrence of wildfires statewide could increase significantly, resulting in higher costs for fire suppression and emergency response, as well as damage to property (California Air Resources Board n.d.).
- **Damage to agriculture.** The effects of global warming, including drought, elevated temperatures, saltwater intrusion caused by rising sea levels, flooding, and increased pest risks, pose a significant threat to California's agricultural industry (Unites States Department of Agriculture n.d.). The industry generated $59 billion in revenue in 2022 and produces over half of all domestic fruits and vegetables (California Department of Food and Agriculture 2024). As California is responsible for feeding not only its own population but also the entire nation and beyond, any reductions in production could result in food shortages and higher prices.
- **Exacerbation of air quality problems.** Californians are already experiencing the worst air quality in the nation, and higher temperatures are only making it worse by causing more smog, which can harm lung function and exacerbate asthma, respiratory and heart diseases, and even death. Sensitive groups such as the elderly, infants, those with chronic heart or lung diseases, and those who work outdoors, are at a higher risk of these negative health impacts (California Office of Environmental Health Hazard Assessment 2024).
- **A rise in sea levels resulting in the population displacement and economic costs.** About 85% of California's population resides and works in the coastal counties. In the past century, sea levels along California's coasts have increased by almost 8 inches and are predicted to rise anywhere from 20 to 55 inches by the end of the century. If the sea level were to rise by 55 inches, almost half a million individuals could be in danger of flooding by 2100, and around $100 billion in property and infrastructure, including hazardous waste sites, roadways, buildings, power plants, and parks and tourist destinations, could be threatened (California Ocean Protection Council 2024). Coastal erosion could also significantly impact California's ocean-based economy, which is valued at approximately $51 billion per year (NOAA Office for Coastal Management 2024).
- **An increase temperature and extreme weather events.** Certain groups of people, such as the elderly, infants, people who cannot afford air conditioning, and those who work outdoors, are at a

higher risk of these negative health impacts caused by extreme heat. As temperatures continue to rise, the number of days with extreme heat events will also increase, putting people at a higher risk of dehydration, heatstroke, heart attacks, and respiratory problems. In 2022, a heat wave in California caused over 395 excess deaths (California Department of Public Health 2023). Heat waves of similar length and intensity to that event could become more frequent and potentially occur annually by the end of the century.

- **Habitat destruction and loss of ecosystems.** Climate change is anticipated to adversely affect California's ecosystems, compromising their capacity to provide essential services such as clean water, wildlife habitats, fisheries, timber, and other resources vital to the state's well-being. The California Attorney General's Office highlights that climate change poses significant threats to the state's biodiversity, including shifting rainfall patterns, increased heat, and rising sea levels, which will make certain places less habitable for plants and animals. Additionally, the California Natural Resources Agency notes that climate change is one of the biggest threats to the state's biodiversity, with shifting rainfall patterns, increased heat, and rising seas making certain places less habitable for plants and animals. These changes are expected to undermine the ability of California's diverse ecosystems to support vital goods and services, impacting the overall welfare of the populace (ResilientCA n.d.).

Greenhouse Gases

Greenhouse gases, or GHGs, are gases that retain heat in the atmosphere, similar to how a greenhouse retains warmth. These gases include water vapor, carbon dioxide, methane, NOx, chlorofluorocarbons, hydrofluorocarbons, perfluorocarbons, sulfur hexafluoride, ozone, and aerosols. GHGs are produced by both natural processes and human activities. The presence of GHGs in the atmosphere has an impact on the earth's temperature. Human activities such as electricity generation, transportation, deforestation, urbanization, and manufacturing have increased the concentration of these gases in the atmosphere beyond natural levels.

Climate change can be attributed to forcings and feedback. Radiative forcing refers to the difference between the amount of incoming and outgoing energy in the climate system. Positive forcing results in warming of the surface, whereas negative forcing leads to cooling. The measurement of radiative forcing is expressed in watts per square meter. Feedback, on the other hand, refer to climate processes that can either enhance or weaken a forcing. For instance, when ice or snow melts, it uncovers darker land that absorbs more radiation and amplifies warming. The global warming potential refers to the capacity of a gas or aerosol to retain heat in the atmosphere. This potential is measured by comparing the radiative forcing of a greenhouse gas with that of carbon dioxide, which serves as the reference gas.

To measure the impact of different greenhouse gases (GHGs) on global warming, scientists use two metrics: global warming potential and carbon dioxide equivalent. Global warming potential measures how much a given mass of a GHG contributes to global warming compared to carbon dioxide, which has a global warming potential of one. For example, methane has a global warming potential of 21, meaning that it has 21 times greater warming effect than carbon dioxide on a molecule-per-molecule basis. Carbon dioxide equivalent is a way of normalizing various GHG emissions to a consistent reference gas, carbon dioxide. It is calculated by multiplying the mass emissions of an individual GHG by its global warming potential. The GHGs defined by Assembly Bill (AB) 32 include carbon dioxide, methane, NOx, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride, and nitrogen trifluoride (NF_3) has also been added as a GHG of concern (Intergovernmental Panel on Climate Change 2007). Each GHG has varying global warming potential and atmospheric lifetimes are presented in Table 11 below.

Table 11. Description of Greenhouse Gasses

Greenhouse Gas	Description and Physical Properties	Sources
Nitrous oxide	Nitrous oxide (laughing gas) is a colorless GHG. It has a lifetime of 114 years. Its global warming potential is 310.	Microbial processes in soil and water, fuel combustion, and industrial processes.
Methane	Methane is a flammable gas and is the main component of natural gas. It has a lifetime of 12 years. Its global warming potential is 21.	Methane is extracted from geological deposits (natural gas fields). Other sources are landfills, fermentation of manure, and decay of organic matter.
Carbon dioxide	Carbon dioxide (CO_2) is an odorless, colorless, natural GHG. Carbon dioxide's global warming potential is 1. The concentration in 2005 was 379 ppm, which is an increase of about 1.4 ppm per year since 1960.	Natural sources include decomposition of dead organic matter; respiration of bacteria, plants, animals, and fungus; evaporation from oceans; and volcanic outgassing. Anthropogenic sources are from burning coal, oil, natural gas, and wood.
Chlorofluorocarbons	These are gases formed synthetically by replacing all hydrogen atoms in methane or ethane with chlorine and/or fluorine atoms. They are nontoxic, nonflammable, insoluble, and chemically unreactive in the troposphere (the level of air at the earth's surface). Global warming potentials range from 3,800 to 8,100.	Chlorofluorocarbons were synthesized in 1928 for use as refrigerants, aerosol propellants, and cleaning solvents. They destroy stratospheric ozone. The Montreal Protocol on Substances that Deplete the Ozone Layer prohibited their production in 1987.
Hydrofluorocarbons	Hydrofluorocarbons are a group of GHGs containing carbon, chlorine, and at least one hydrogen atom. Global warming potentials range from 140 to 11,700.	Hydrofluorocarbons are synthetic manmade chemicals used as a substitute for chlorofluorocarbons in applications such as automobile air conditioners and refrigerants.
Perfluorocarbons	Perfluorocarbons have stable molecular structures and only break down by ultraviolet rays about 60 kilometers above Earth's surface. Because of this, they have long lifetimes, between 10,000 and 50,000 years. Global warming potentials range from 6,500 to 9,200.	Two main sources of perfluorocarbons are primary aluminum production and semiconductor manufacturing.

Sulfur hexafluoride	Sulfur hexafluoride (SF_6) is an inorganic, odorless, colorless, and nontoxic, nonflammable gas. It has a lifetime of 3,200 years. It has a high global warming potential, 23,900.	This gas is manmade and used for insulation in electric power transmission equipment, in the magnesium industry, in semiconductor manufacturing, and as a tracer gas.
Nitrogen trifluoride	Nitrogen trifluoride (NF_3) was added to Health and Safety Code section 38505(g)(7) as a GHG of concern. It has a high global warming potential of 17,200	This gas is used in electronics manufacture for semiconductors and liquid crystal displays.
Black Carbon	Black Carbon was added to the CARB list of SLCP in 2017. It has a global warming potential of 4,470.	This particulate matter is emitted from burning of coal, diesel, and biomass (anthropogenic and natural).
(Intergovernmental Panel on Climate Change 2007) (Intergovernmental Panel on Climate Change 2007) (California Air Resources Board 2017)		

In 2014, Governor Jerry Brown signed Senate Bill 605, which requires the CARB to develop a comprehensive strategy to reduce emissions of methane and other short-lived climate pollutants. The law requires CARB to adopt regulations to reduce methane emissions from key sources, including oil and gas production, landfills, and dairies (California State Legislature, 2013-2014 Session 2014). In March 2017, the CARB approved a Short-Lived Climate Pollutants (SLCP) Reduction Strategy for reducing emissions of high global-warming potential gases with short atmospheric lifetimes. SLCPs regulated under this plan include methane, hydrofluorocarbons (HFC), and anthropogenic black carbon (California Air Resources Board 2017). Fluorinated gases and CH_4 are described in Table 8 and are already included in the California GHG inventory

Ozone is not released directly into the atmosphere but is created from the precursor emissions of volatile organic compounds (VOC), oxides of nitrogen (NOx) at a regional scale, and CH_4 at a hemispheric scale. These precursor emissions will also be addressed as part of the strategy. The SLCP includes addressing ozone, which is a short-lived climate pollutant that impacts evaporation, cloud formation, and precipitation.

Black Carbon is contained in fine particulate matter, which is created by the incomplete burning of fossil fuels, biofuels, and biomass. Local black carbon sources can include exhaust from diesel trucks, vehicles, equipment, and smoke from biogenic combustion. Biogenic combustion sources of black carbon include the burning of biofuels for transportation, biomass for electricity generation and heating, prescribed burning of agricultural residue, and natural and unnatural wildfires. Unlike other greenhouse gases that can persist in the atmosphere for years, black carbon is an aerosol, which means that it is comprised of particles or liquid droplets that can only remain in the atmosphere for days to weeks. Black carbon can be deposited on snow, reducing sunlight reflectivity, and accelerating snowmelt. It can have both direct and indirect effects on climate, such as absorbing incoming and outgoing radiation, affecting cloud reflectivity, precipitation, and surface dimming (cooling).

Water vapor is categorized as a GHG, and it is a significant factor in our climate system that is not subject to regulations. As the levels of water vapor increase, it causes a rise in temperatures, resulting in more water vapor being absorbed into the atmosphere. Warming and water absorption increase in a spiraling cycle. Additionally, the water vapor feedback mechanism can enhance the warming effect of other GHGs, meaning that as the concentration of CO_2 increases, more water vapor is retained in the atmosphere (Buis 2022).

While alterations in the climate and their outcomes may lead to health concerns, breathing in GHGs at their current atmospheric concentrations is unlikely to have negative health impacts except for ozone and particulate matter. The possible effects of these pollutants are explored in evaluations of criteria pollutants. However, high indoor levels of carbon dioxide, methane, sulfur hexafluoride, and certain chlorofluorocarbons can potentially cause suffocation by displacing oxygen, but this only occurs at levels much higher than those found outdoors (Center for Disease Control and Prevention 2019) (Center for Disease Control and Prevention 2010).

Emissions Inventories

Emissions worldwide were approximately 59,000 million metric tons of carbon dioxide equivalents ($MMTCO_2e$) in 2019 (Intergovernmental Panel on Climate Change 2022). GHG emissions trends from 1990 to 2019 are shown in Figure 10, broken down by different greenhouse gasses and sources.

Figure 11. Greenhouse Gas Emissions Trends

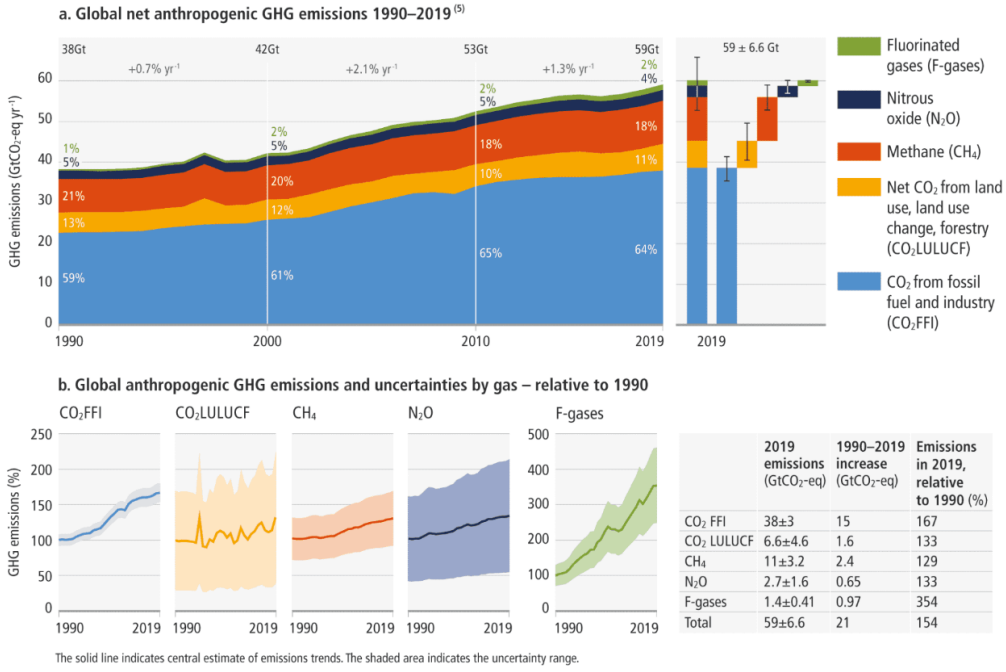


Figure 10: Three graphs and one table showing the global net anthropogenic GHG emissions from 1990-2019. The figures show an increase in CO_2 (from fossil fuels), CO_2 (from land use change), methane, nitrous oxide, and fluorinated gasses. Increases of each gas are: 167% CO2 (from fossil fuels), 133% CO2 (from land use change), 129% methane, 133% nitrous oxide, and 354% fluoridated gases.

As shown in Figure 11 below, the main contribution of GHG emissions in California between years 2000 and 2020 was transportation. The second highest sector was industrial, which includes sources from refineries, general fuel use, oil and gas extraction, cement plants, and cogeneration heat output. A downward trend can be seen from these two highest sectors of GHG emissions (California Air Resources Board 2022).

Figure 12. Greenhouse Gas Emission Trends by Sector in California

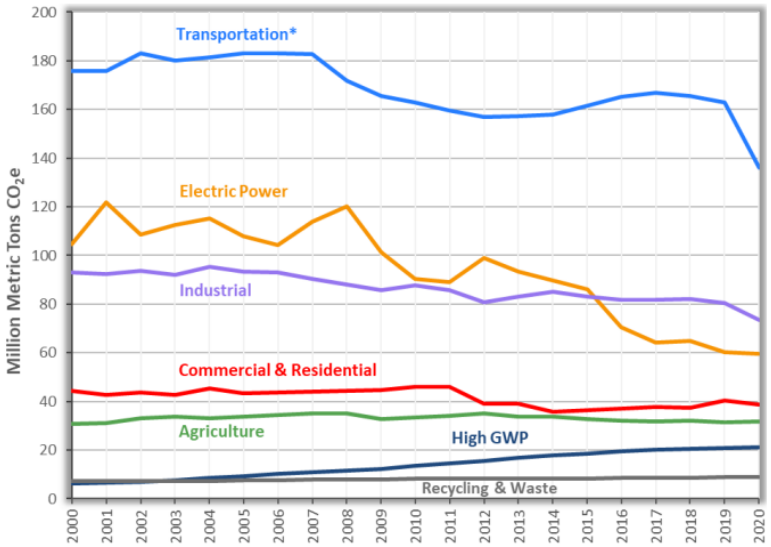


Figure 11: A line graph showing GHG emissions trends by sector in California between 2000 to 2020. Transportation starts at 178 MMT CO_2e and trends down to 135 MMT CO_2e. Electric power starts at 105 MMT CO_2e and trends down to 60 MMT CO_2e. Industrial starts at 95 and trends down to 75 MMT CO_2e. Commercial & residential starts at 43 MMT CO_2e and trends down to 40 MMT CO_2e. Agriculture starts at 32 MMT CO_2e, remains flat, and ends at MMT CO_2e. High GWP starts at 5 MMT CO_2e and trends upward to 22 MMT CO_2e. Recycling and waste start at 5 MMT CO_2e and remains flat and ends at 5 MMT CO_2e.

In March 2024, the Fresno Council of Governments prepared its Priority Climate Action Plan (PCAP) for Fresno County. The PCAP estimated the County's total CO_2e emissions at 12,209106 $MMCO_2e$ in 2019. As shown in Figure 15 below, the sources of GHG emissions by sector in Fresno County break down to 44% from transportation, agriculture at 19%, residential and commercial building energy use at 17%, industrial at 13%, waste and wastewater at 4% and fugitive emissions at 3% (Fresno Council of Governments 2024).

Figure 13. 2019 Fresno County GHG Emissions Inventory

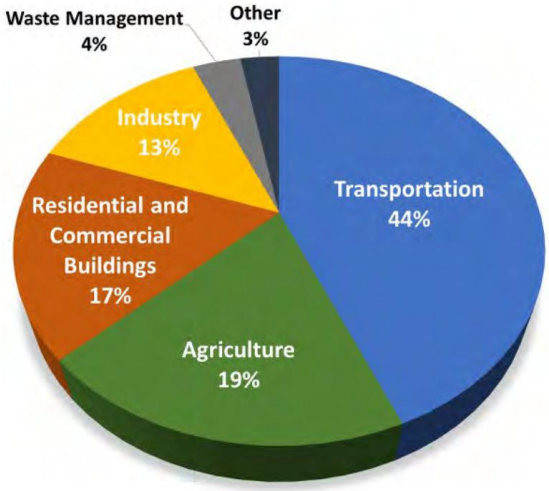


Figure 12: A pie chart showing 2019 Fresno County GHG emission inventory. The chart shows: Transportation 44%, agriculture 19%, residential and commercial buildings 17%, industry 13%, waste management 4%, and other 3%.

Regulatory Environment

U.S. Involvement in International Agreements

As climate change is a problem that affects the entire world and stems from greenhouse gas emissions from various sources from all countries, including those mentioned above. International agreements to reduce GHG emissions have been put forth since 1988, as explained below.

Intergovernmental Panel on Climate Change. The IPCC was established in 1988 by the United Nations Environmental Programme (UNEP) and the World Meteorological Organization (WMO). Its purpose is to evaluate the scientific, technical, and socio-economic data pertaining to the scientific foundation of the dangers of climate change caused by humans, its consequences, and the options for coping with and reducing it (IPCC 2025).

United Nations Framework Convention on Climate Change (Convention). The United States, along with several other nations, signed the Convention on March 21, 1994. This treaty requires countries to gather and exchange data concerning greenhouse gas emissions, national policies, and effective approaches. Additionally, countries must develop their own strategies for addressing GHG emissions and adjusting to the projected impacts of climate change, including providing financial and technological assistance to developing nations. The convention identified that cooperation between nations is necessary to prepare for the effects of climate change (United Nations n.d.).

Kyoto Protocol. The Kyoto Protocol is a global agreement associated with the United Nations Framework Convention on Climate Change. Its primary aspect involves implementing compulsory goals for 37 advanced nations and the European Union to lessen their GHG emissions by an average of five percent compared to 1990 levels throughout 2008 to 2012. Although the Convention (as mentioned

earlier) prompted developed nations to stabilize their emissions, the Protocol requires them to do so. Since developed nations have contributed a larger amount of emissions over the past 150 years, the Protocol follows the principle of "common but differentiated responsibilities" and places a heavier obligation on developed nations (United Nations 2025).

In 2001, President George W. Bush announced that he would not present the treaty to the U.S. Senate for ratification, which marked the end of the United States' involvement in the Kyoto Protocol (Bush 2001). In December 2009, global leaders convened in Copenhagen to discuss the future of international commitments for combating climate change after the Kyoto Protocol. Although no obligatory agreement was established during the conference, the committee identified the long-term objective of capping the maximum average temperature increase at no more than 2°C above pre-industrial levels (European Environment Agency 2010).

Paris Agreement. The Paris Agreement is an international treaty aimed at combating climate change, adopted at the United Nations Climate Change Conference in Paris in December 2015. The agreement sets a long-term goal of keeping the increase in global average temperature to well below 2 degrees Celsius above pre-industrial levels, and to pursue efforts to limit the increase to 1.5 degrees Celsius.

The Paris Agreement is significant because it marks the first time that all countries, including both developed and developing nations, have agreed to take collective action to address climate change. The agreement calls on countries to set their own nationally determined contributions (NDCs) for reducing greenhouse gas emissions and to regularly report on their progress.

In addition to setting emission reduction targets, the Paris Agreement also includes provisions for financial assistance to developing countries to support their efforts to address climate change, as well as measures for adapting to the impacts of climate change. The agreement encourages countries to work together on technology development and transfer, capacity-building, and other cooperative measures to promote sustainable development and reduce emissions. The Paris Agreement entered into force on November 4, 2016, and as of March 2023, 197 countries have signed and ratified the agreement (United Nations n.d.).

The United States played a significant role in the negotiation of the Paris Agreement and was a key player in shaping the final text. Under the Obama administration, the US made a commitment to reduce greenhouse gas emissions by 26-28% below 2005 levels by 2025 (The White House 2015). However, the US involvement in the Paris Agreement has been inconsistent from 2016 to 2025 with the election of President Trump in 2016, President Biden in 2020, and reelection of President Trump in 2024.

President Trump initiated the process to withdraw the United States from the Paris Agreement by signing an executive order on June 1, 2017 (U.S. Department of State 2019). This order directed the U.S. to begin the formal withdrawal process, which took effect on November 4, 2020. However, President Joe Biden signed an executive order to rejoin the Agreement in January 2021. By March 2023, the US was once again a signatory to the Paris Agreement, and the Biden administration has announced the United States' commitment to achieving net-zero emissions by 2050 (The White House 2021). To reverse course

again, President Trump has taken steps to remove the United States from the Paris Agreement. On January 20, 2025, Trump signed Executive Order 14162, titled "Putting America First In International Environmental Agreements," directing the immediate withdrawal of the U.S. from the Paris Agreement and other international climate commitments (The White House 2025). Formal notification was submitted to the United Nations in January 2025, and in accordance with Article 28 of the Paris Agreement, the United States' withdrawal became effective on January 27, 2026. As of that date, the United States is no longer a signatory to the Paris Agreement (Haskett 2025)

Notwithstanding changes in federal participation, the Paris Agreement does not establish project-level greenhouse gas emission thresholds under CEQA. Evaluation of greenhouse gas impacts under CEQA is guided by State and local climate policies, including California's statutory emissions reduction targets and executive orders, which remain in effect independent of federal treaty status. Accordingly, federal withdrawal from the Paris Agreement does not alter the applicable CEQA framework for evaluating greenhouse gas emissions associated with the project.

Federal

Energy Policy Act of 2005. The Energy Policy Act of 2005, enacted on August 8, 2005, introduced a range of provisions to promote renewable energy and energy efficiency. The legislation extended and expanded tax credits for electricity production from qualified sources, including landfill gas. It also provided financial support through bond financing, tax incentives, grants, and loan guarantees to encourage clean renewable energy development and rural electrification. Additionally, the act established a federal mandate requiring a portion of energy purchases to come from renewable sources (Environmental Protection Agency 2024).

Greenhouse Gas Endangerment. The case of Massachusetts v. EPA (Supreme Court Case 05-1120) was heard by the US Supreme Court on November 29, 2006. The case involved a petition to regulate four greenhouse gases, including carbon dioxide, under Section 202(a)(1) of the Clean Air Act. On April 2, 2007, the Supreme Court ruled that greenhouse gases are air pollutants covered by the Clean Air Act. The Court determined that the Administrator of the EPA must determine whether the emissions of greenhouse gases from new motor vehicles are likely to contribute to air pollution that endangers public health or welfare, or if the science is too uncertain to decide. On December 7, 2009, the EPA Administrator signed two separate findings related to greenhouse gases under Section 202(a) of the Clean Air Act.

- Endangerment Finding: The Administrator finds that the current and projected concentrations of the six key well-mixed greenhouse gases—carbon dioxide, methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride—in the atmosphere threaten the public health and welfare of current and future generations.
- Cause or Contribute Finding: The Administrator finds that the combined emissions of these well-mixed greenhouse gases from new motor vehicles and new motor vehicle engines contribute to the greenhouse gas pollution, which threatens public health and welfare.

These findings do not mandate that industry, or other entities take any specific actions. However, they were necessary to establish GHG emissions standards for vehicles, as explained in the "Clean Vehicles" section below.

In 2010, the EPA denied 10 petitions for Reconsideration of the Endangerment and Cause or Contribute Findings. Among the petitioners were the Ohio Coal Association, Peabody Energy Company, and the State of Texas.

An evaluation conducted by the EPA Office of Inspector General in September 2011 examined the EPA's compliance with established policies and procedures in developing the endangerment finding, including the processes for ensuring information quality. The evaluation concluded that the technical support document should have undergone more rigorous EPA peer review.

In June 2012, a federal appeals court dismissed a lawsuit filed by 13 states against the EPA. The lawsuit alleged that the EPA violated the law by relying entirely on data from the United Nations Intergovernmental Panel on Climate Change instead of conducting its own research or testing data in accordance with federal standards. The states involved in the lawsuit were Virginia, Texas, Alabama, Florida, Hawaii, Indiana, Kentucky, Louisiana, Mississippi, Nebraska, North Dakota, Oklahoma, South Carolina, South Dakota, and Utah (Environmental Protection Agency 2022).

Clean Vehicles. In October 2012, the EPA and the National Highway Traffic Safety Administration (NHTSA), representing the Department of Transportation, finalized regulations aimed at further reducing GHG emissions and enhancing Corporate Average Fuel Economy (CAFE) standards for light-duty vehicles from model year 2017 onward. NHTSA has enforced CAFE standards under the Energy Policy and Conservation Act since 1978. This federal initiative mandates that automobile manufacturers produce a unified national light-duty fleet that complies with both federal regulations and the emissions standards established by California and other states. Under this program, fuel efficiency was set to increase to an equivalent of 54.5 miles per gallon (mpg), capping fleet-wide vehicle emissions at 163 grams of CO_2 per mile by model year 2025 (Environmental Protection Agency 2024).

In January 2017, EPA Administrator Gina McCarthy issued a Final Determination upholding the existing GHG emissions standards for model years 2022–2025. However, on March 15, 2017, EPA Administrator Scott Pruitt and Department of Transportation Secretary Elaine Chao announced EPA’s intent to reconsider this determination. Subsequently, on April 2, 2018, Administrator Pruitt officially rescinded the January 2017 Final Determination, citing new data indicating that the existing standards may be overly stringent due to shifts in key assumptions, including fuel price projections and consumer adoption rates of advanced technology vehicles. The April 2nd decision did not constitute EPA’s final agency action; rather, the agency announced plans to initiate rulemaking to establish revised standards. Until new regulations are formally adopted, the existing standards remain in effect (Environmental Protection Agency 2025).

In March 2022, The U.S. Department of Transportation's NHTSA and the EPA finalized the SAFE Vehicles Rule, which adjusted the CAFE and CO_2 emissions standards for passenger cars and light

trucks for model years 2021–2026. This rule increased stringency by 1.5% annually, compared to the 5% annual increases mandated by the 2012 standards (NHTSA 2020).

In July 2024 NHTSA established new CAFE standards for passenger cars and light trucks, increasing requirements by 2% per year for passenger cars in model years 2027–2031, maintaining current levels for light trucks in model years 2027–2028, and then increasing by 2% per year for light trucks in model years 2029–2031. Additionally, fuel efficiency standards for heavy-duty pickup trucks and vans were set to increase by 10% annually for model years 2030–2032 and by 8% annually for model years 2033–2035 (U.S. Department of Transportation 2024).

In January 2025, U.S. Transportation Secretary Sean Duffy signed an order to reverse vehicle fuel economy standards set during President Joe Biden's administration. The previous standards aimed to increase fuel efficiency to approximately 50.4 miles per gallon by 2031. The new directive instructed NHTSA to reassess these standards for model years 2022 through 2031 and to consider new regulations for heavy-duty vehicles through 2035 (Reuters 2025).

Clean Power Plan

The US Clean Power Plan was a regulation put forward by the Obama administration in 2015 to reduce carbon emissions from power plants in the United States. The plan aimed to reduce carbon emissions from power plants by 32% below 2005 levels by 2030.

The idea for the Clean Power Plan was first proposed in 2013 as part of President Obama's Climate Action Plan. The EPA proposed the plan in June 2014, and after a public comment period, it was finalized in August 2015.

However, the Clean Power Plan was met with legal challenges from states and industry groups, who argued that the EPA did not have the authority to regulate carbon emissions from power plants under the Clean Air Act. The SCOTUS issued a stay on the Clean Power Plan in February 2016, and the Trump administration later moved to repeal the plan in 2017.

In June 2019, the Trump administration replaced the Clean Power Plan with the Affordable Clean Energy (ACE) rule, which focused on individual power plants rather than setting a national standard for emissions reductions. However, in January 2021, the Biden administration signed an executive order directing the EPA to revisit the Clean Power Plan and consider implementing stricter emissions standards (Environmental Protection Agency 2023d).

On June 30, 2022, the U.S. Supreme Court (SCOTUS) published their decision for the case of West Virginia v. EPA. The case revolved around the question of—does the Environmental Protection Agency have the authority to regulate greenhouse gas emissions in any industry, so long as it considers cost, non-air impacts, and energy requirements? The SCOTUS decided that in Section 111(d) of the FCAA, Congress did not give the EPA the power to create emissions limits using the generation shifting approach used in the Clean Power Plan. The "major questions doctrine" states that in certain cases, if the agency's authority is broad and significant, there must be clear congressional authorization for the

authority it claims. The EPA admits that issues of electricity transmission, distribution, and storage are not within its traditional expertise, and therefore lacks the authority to implement the Clean Power Plan under the FCAA without explicit congressional authorization (West Virginia v. Environmental Protection Agency 2023). However, the EPA continued finalizing rules to limit GHG emissions from power plants that abide by the court's ruling.

In May 2024, the EPA finalized greenhouse gas emission limits for fossil fuel-fired power plants. The rule sets CO_2 limits for new gas-fired combustion turbines and establishes CO_2 emission guidelines for existing coal, oil, and gas-fired steam generating units. The standards are designed to secure important climate benefits and protect public health by reducing greenhouse gas emissions from the power sector (Environmental Protection Agency 2025).

California

Legislative Actions to Reduce GHGs

The California legislature has passed multiple bills that make up the most assertive plan to decrease GHG emissions of any state in the country. This section provides an overview of the development GHG emission laws and resulting regulations in California.

AB 32 and 2008 Scoping Plan. In 2006, AB 32, also known as the California Global Warming Solutions Act, was passed by the California State Legislature. Its aim is to reduce the amount of GHGs emitted in California to levels that were observed in 1990 by 2020. The definition of "greenhouse gases" under AB 32 includes carbon dioxide, methane, NOx, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride, with the addition of NF_3 being included since AB 32 was enacted. The responsibility of monitoring and regulating sources of GHGs falls under the authority of the California Air Resources Board (CARB). AB 32 lays out the following provisions:

> "Global warming poses a serious threat to the economic well-being, public health, natural resources, and the environment of California. The potential adverse impacts of global warming include the exacerbation of air quality problems, a reduction in the quality and supply of water to the state from the Sierra snowpack, a rise in sea levels resulting in the displacement of thousands of coastal businesses and residences, damage to marine ecosystems and the natural environment, and an increase in the incidences of infectious diseases, asthma, and other human health- related problems."

AB 32 resulted in CARB issuing the Scoping Plan in 2008 which includes a wide range of strategies, regulations, and initiatives across various sectors, such as transportation, energy, and agriculture, that aim to reduce GHG emissions. Some of the key strategies identified in the Scoping Plan include implementing a cap-and-trade program, promoting renewable energy, and increasing the fuel efficiency of vehicles. The Scoping Plan also outlines methods for monitoring, reporting, and verifying GHG emissions and reductions. The goal of the Scoping Plan is to provide a framework for California to address climate

change by reducing GHG emissions while promoting sustainable economic growth (California Air Resources Board 2023). The 2008 Scoping Plan has been updated by CARB after the passing of SB 32.

SB 97 and the CEQA Guidelines Update. In August 2007, SB 97 was passed and added Section 21083.05 and Section 21097 to the Public Resources Code. According to Section 21083.05, the Office of Planning and Research was required to prepare guidelines for the mitigation of GHG emissions or their effects associated with transportation or energy consumption, and to transmit them to the Resources Agency by July 1, 2009. The Resources Agency was then required to certify and adopt these guidelines by January 1, 2010 (California State Legislature 2007-2008 Session 2007).

The Office of Planning and Research recommended amendments to the CEQA Guidelines for addressing GHG emissions on April 13, 2009, and submitted them to the Secretary for Natural Resources. On July 3, 2009, the Natural Resources Agency began the process of certifying and adopting these amendments under Public Resources Code section 21083.05, following a public comment period of 55 days and two public hearings. Afterward, the agency proposed changes to the text of the guideline's amendments (California Association of Environmental Professionals 2010).

On December 31, 2009, the Natural Resources Agency sent the complete rulemaking file, along with the adopted amendments, to the Office of Administrative Law. The Amendments were approved by the Office of Administrative Law on February 16, 2010, filed with the Secretary of State for the California Code of Regulations. As a result, the Amendments became effective on March 18, 2010.

The CEQA Amendments provide direction to public agencies on how to analyze and reduce the effects of GHG emissions in CEQA documents. These Amendments are integrated into the existing CEQA framework by modifying existing guidelines to incorporate the concept of climate change.

One of the changes made was the addition of a new section, CEQA Guidelines Section 15064.4, which helps agencies determine the importance of GHG emissions. This section gives agencies the flexibility to decide whether a quantitative or qualitative analysis is more appropriate for a specific project. However, there is limited guidance on the next crucial step in the evaluation process: determining whether the estimated GHG emissions of the project are significant or cumulatively significant (California Association of Environmental Professionals 2010).

The Amendments also affected CEQA Guidelines Sections 15126.4 and 15130, which deal with mitigation measures and cumulative impacts, respectively. While GHG mitigation measures are mentioned in general terms, specific measures are not recommended. The revision to Section 15130, which pertains to cumulative impacts, instructs agencies to analyze GHG emissions in an Environmental Impact Report (EIR) when a project's added emissions could be cumulatively considerable. However, it does not specify when emissions are considered cumulatively considerable (California State Legislature 2007-2008 Session 2007).

Section 15183.5 permits programmatic GHG analysis and subsequent project-specific tiering, and the development of Greenhouse Gas Reduction Plans. Adhering to such plans can assist in determining that

a project's cumulative impact is not cumulatively considerable, according to proposed Section 15183.5(b). Furthermore, the Amendments revised Appendix F of the CEQA Guidelines, which focuses on Energy Conservation. The sample environmental checklist in Appendix G was also amended to include GHG-related questions (California State Legislature 2007-2008 Session 2007).

Advanced Clean Cars Program. In January 2012, the CARB approved the Advanced Clean Cars program, which integrates regulations for GHG emissions, criteria air pollutants, and the expansion of zero-emission vehicles (ZEVs) into a unified set of standards for vehicle model years 2017–2025. The program strengthens GHG emission standards for vehicles starting with the 2017 model year by utilizing existing technologies, incorporating lighter and more durable materials, and improving drivetrain and engine efficiency.

Under the program's ZEV regulation, battery electric, fuel cell, and plug-in hybrid electric vehicles must comprise up to 15% of new vehicle sales in California by 2025. Additionally, the program includes a clean fuels outlet regulation aimed at facilitating the commercialization of hydrogen fuel cell vehicles. This regulation mandates the expansion of hydrogen fueling stations throughout the state, with the number of stations increasing in response to fuel cell vehicle sales. By 2025, once fully implemented, the program is expected to reduce global warming emissions from new cars and light trucks by 34% and smog-forming emissions by 75% compared to 2016 levels (California Air Resources Board 2019).

In 2022, the CARB adopted the Advanced Clean Cars II regulations, establishing stringent emission standards for light-duty vehicles for model years 2026 through 2035. These regulations mandate that by 2035, all new passenger cars, trucks, and SUVs sold in California must be zero-emission vehicles (California Air Resources Board n.d.).

SB 32 and 2017 Scoping Plan. SB 32, signed into law in 2016, extends the targets set by AB 32 by requiring the state to reduce greenhouse gas emissions to 40% below 1990 levels by the year 2030. SB 32 also directs CARB to develop strategies and policies to achieve this goal, including an update to the state's Climate Change Scoping Plan (California State Legislature, 2015-2016 Session 2016). The 2017 updated Scoping Plan builds on the previous Scoping Plan developed under AB 32 and includes new and expanded measures across various sectors, such as transportation, energy, and industry. Some of the key strategies identified in the updated plan include transitioning to renewable energy, increasing energy efficiency, promoting zero-emission vehicles, and reducing short-lived climate pollutants. The updated Scoping Plan also emphasizes the importance of addressing environmental justice and ensuring that all Californians benefit from the state's efforts to combat climate change (California Air Resources Board 2023).

2018 CEQA Guideline Updates. The California National Resources Agency finalized its amendments and additions to the State CEQA guidelines, which were approved by the Office of Administrative Law in 2018 One significant change was the addition of CEQA Guidelines Section 15064.4.1, which established new thresholds of significance for evaluating GHG emissions impacts. This section provides new screening criteria for determining whether a project's GHG emissions are considered significant, based on its location, type, and size (California Natural Resources Agency 2018).

This section provides screening criteria that agencies can use to determine if a project's GHG emissions are considered significant under CEQA. The section sets forth a two-part process for evaluating the significance of GHG emissions. The first step involves a qualitative analysis to determine if the project has the potential to cause a substantial increase in GHG emissions or if it could contribute to a cumulative impact on the environment. The second step is a quantitative analysis to evaluate the level of GHG emissions associated with the project.

The section outlines specific thresholds of significance for evaluating GHG emissions impacts. The significance thresholds are based on a project's location, type, and size. The thresholds are intended to provide a consistent and transparent approach for determining whether a project's GHG emissions are significant. CEQA Guidelines Section 15064.4.1 provides guidance for agencies to use in evaluating the significance of GHG emissions from a project, and it helps to ensure that these evaluations are consistent and transparent (California Code of Regulations, Title 14, § 15064.4 n.d.).

Additionally, CEQA Guidelines Section 15125 and Appendix F were updated to reflect current scientific understanding and state policy goals related to climate change. The amendments require lead agencies to evaluate the potential impact of climate change on a proposed project and disclose any significant impacts in the EIR.

Finally, CEQA Guidelines Section 15126.4 was revised to include additional guidance on the implementation of mitigation measures to reduce GHG emissions from a project, including the use of offset programs, and the development of a Greenhouse Gas Reduction Plan (GGRP) (California Natural Resouces Agency 2018).

AB 1279 and 2022 Scoping Plan. This bill, the California Climate Crisis Act passed in September 2022 proposes a policy for the State to achieve net zero GHG as soon as possible, but no later than 2045, and to maintain net negative greenhouse gas emissions thereafter. The bill also aims to reduce statewide anthropogenic GHG emissions to at least 85% below the 1990 levels by 2045. To achieve these policy goals, the state board will collaborate with relevant state agencies to update the scoping plan, which should recommend measures to achieve the policy goals and implement policies and strategies that enable carbon dioxide removal solutions and carbon capture, utilization, and storage technologies in California (California State Legislater 2021-2022 Session 2022).

The resulting 2022 Scoping Plan outlines a strategy on how to achieve carbon neutrality through targets for carbon neutrality and reduce human-caused greenhouse gas (GHG) emissions by 85% below 1990 levels before 2045. The plan proposes various actions to achieve these goals, such as deploying clean technologies and fuels to significantly reduce fossil fuel combustion, reducing short-lived climate pollutants even further, promoting sustainable development, implementing measures to decrease emissions and store carbon in natural and working lands, and capturing and storing carbon. The outcomes of these actions will lead to significant reductions in GHG emissions, as well as progress towards achieving carbon neutrality (California Air Resources Board 2023).

SB 375. Senate Bill (SB) 375 was passed by the Senate on August 30, 2008, and signed into law by the Governor on September 30, 2008. According to the bill, the transportation sector is the largest contributor of GHG emissions in California, accounting for more than 40% of the total GHG emissions. SB 375 acknowledges that achieving the goals of AB 32 will not be possible without improving land use and transportation policies. To address this issue, SB 375 mandates the following actions: (1) requiring metropolitan planning organizations to incorporate sustainable community strategies in their regional transportation plans to reduce GHG emissions, (2) aligning planning for transportation and housing, and (3) providing incentives for implementing these strategies (California State Legislature 2007-2008 Session 2008).

California Senate Bill 375 includes provisions regarding the CEQA. Public Resources Code Section 21159.28 of SB 375 specifies that certain projects do not need to provide CEQA findings or determinations related to two types of impacts: (1) growth-inducing impacts and (2) project-specific or cumulative impacts from cars and light-duty truck trips on global warming or the regional transportation network. However, this exemption only applies to projects that meet specific criteria. These criteria include being located in an area with an approved sustainable communities strategy (SCS) or alternative planning strategy that the CARB accepts as achieving the greenhouse gas emission reduction targets, being consistent with that strategy in terms of designation, density, building intensity, and applicable policies, and incorporating mitigation measures required by a prior environmental document (State of California's Office of Planning and Research 2011).

SB 743. California SB 743 is a state law that was signed by Governor Jerry Brown on September 27, 2013. The law aims to streamline the environmental review process for certain types of development projects in California. Specifically, SB 743 requires the Governor's Office of Planning and Research to develop new guidelines for analyzing the transportation impacts of development projects. Under the new guidelines, transportation impacts must be evaluated based on the vehicle miles traveled (VMT) generated by the project, rather than the level of service (LOS) of the project's intersections. The VMT metric is intended to encourage more sustainable transportation options, such as walking, biking, and public transit, and to reduce the overall environmental impact of development projects (Metropolitan Transportation Commission n.d.).

SB 743 also includes provisions that exempt certain types of infill development projects from the CEQA, which is a state law that requires environmental review of certain types of projects. These exemptions are intended to encourage more compact, walkable development in existing urban areas, rather than sprawling development on undeveloped land. Overall, SB 743 represents a significant shift in the way that transportation impacts are evaluated for development projects in California (California State Legislature 2013-2014 Session 2013).

AB 1493. Also known as the Pavley Bill, AB 1493 is a California state law introduced by former Assemblymember Fran Pavley in 2002. The bill required the CARB to establish regulations to limit greenhouse gas emissions from new passenger vehicles sold in California. The regulations were to be implemented in phases, with the goal of achieving a 30% reduction in emissions from new passenger vehicles by 2016. The passage of AB 1493 was significant because it made California the first state in the

United States to regulate greenhouse gas emissions from vehicles. It also paved the way for other states to follow suit, as several other states adopted California's emissions standards in the following years.

However, AB 1493 faced legal challenges from the automobile industry, which argued that the state law was preempted by federal regulations. The case eventually made its way to the United States Supreme Court, which ruled in 2007 that the federal government did not have the authority to block California from implementing its own vehicle emissions standards. In response to the legal challenges and the Supreme Court ruling, the federal government and California reached an agreement in 2009 to establish a single national standard for vehicle emissions. The agreement, which was supported by the automobile industry, set new emissions standards for vehicles sold in the United States through the year 2016, and set the stage for future agreements on vehicle emissions (California Air Resources Board 2023).

SB 1368. In 2006, the State Legislature adopted SB 1368, which was signed into law by the Governor. SB 1368 directs the California Public Utilities Commission to adopt a performance standard for GHG emissions for the future power purchases of California utilities. SB 1368 seeks to limit carbon emissions associated with electrical energy consumed in California by forbidding procurement arrangements for energy longer than 5 years from resources that exceed the emissions of a clean, combined cycle natural gas power plant. Because of the carbon content of its fuel source, a coal-fired plant cannot meet this standard because such plants emit twice as much carbon as natural gas, combined cycle plants. Accordingly, the new law will effectively prevent California’s utilities from investing in, otherwise financially supporting, or purchasing power from new coal plants located in or out of the State. Thus, SB 1368 will lead to dramatically lower GHG emissions associated with California’s energy demand, as SB 1368 will effectively prohibit California utilities from purchasing power from out-of-state producers that cannot satisfy the performance standard for GHG emissions required by SB 1368. The California Public Utilities Commission adopted the regulations required by SB 1368 on August 29, 2007 (California Energy Comission 2023).

SB 350. Also known as the Clean Energy and Pollution Reduction Act of 2015, SB 350 is a state law that sets ambitious targets for California's clean energy transition. The law aims to increase energy efficiency, reduce petroleum use in transportation, and increase the use of renewable energy. Specifically, the law requires California to: 1) Increase the amount of energy obtained from renewable sources, such as wind and solar, to 50% by 2030, 2) double the energy efficiency of buildings in the state by 2030, 3) reduce the use of petroleum in cars and trucks by 50% by 2030. California SB 350 is a crucial part of California's efforts to combat climate change, reduce greenhouse gas emissions, and transition to a cleaner, more sustainable energy system. The law has been praised for its bold targets and its potential to drive innovation in the clean energy industry (California Energy Comission 2023).

SB 100. California SB 100 is a state law that was signed by Governor Jerry Brown on September 10, 2018. The law sets one of the most ambitious clean energy targets in the world, requiring California to obtain 100% of its electricity from zero-carbon sources by 2045. Specifically, SB 100 sets the following targets for California: 1) 50% of electricity must be obtained from renewable energy sources, such as wind and solar, by 2025, 2) 60% of electricity must be obtained from renewable energy sources by 2030,

3) 100% of electricity must be obtained from zero-carbon sources, which includes renewable energy, energy storage, and other zero-carbon technologies, by 2045.

SB 100 represents a significant milestone in California's efforts to combat climate change and transition to a cleaner, more sustainable energy system. The law has been praised for its bold targets and its potential to accelerate the deployment of renewable energy and other clean energy technologies in California and beyond (California State Legislature 2017-2018 Session 2018).

SB 398. California AB 398 is a state bill that was signed into law in 2017, and it extends California's cap-and-trade program, which aims to reduce GHG emissions in the state. The bill establishes GHG reduction targets of 40% below 1990 levels by 2030 and extends the cap-and-trade program through 2030. The cap-and-trade program limits the amount of GHG emissions businesses can produce. Businesses can purchase and trade allowances to emit a certain amount of GHGs. The total number of allowances decreases over time, which puts pressure on businesses to reduce their emissions.

AB 398 also includes provisions to assist low-income communities affected by air pollution and to support the development of renewable energy and energy efficiency projects in those communities. The bill also establishes a framework for investing cap-and-trade revenues in a variety of programs, including public transportation, affordable housing, and programs to reduce GHG emissions in the agricultural sector. The extension of the cap-and-trade program under AB 398 has been seen as a significant step forward in California's efforts to address climate change and reduce GHG emissions, as it provides a stable and predictable policy framework for businesses and the state to work together to achieve emissions reductions targets (California State Legislature 2017-2018 Session 2017).

SB 605. Also known as the Short-Lived Climate Pollutants bill, SB 605 was introduced by Senator Ricardo Lara in 2017. The bill aimed to reduce emissions of short-lived climate pollutants (SLCPs) such as methane, black carbon, and fluorinated gases, which have a significant impact on climate change. SB 605 requires the CARB to develop a comprehensive strategy to reduce SLCP emissions in California, including setting targets for reducing SLCP emissions, identifying regulatory and voluntary measures to achieve those targets, and establishing reporting requirements for SLCP emissions. The bill also requires CARB to consider the social and economic impacts of its regulations on vulnerable communities, and to prioritize measures that reduce SLCP emissions while also promoting economic development, job creation, and public health. (California State Legislature, 2013-2014 Session 2014)

SB 1383. California SB 1383 is a state bill that was signed into law in 2016, and it aims to reduce emissions of SLCPs such as methane, black carbon, and fluorinated gases in California. The bill sets targets for reducing organic waste disposal in the state by 50% by 2020 and 75% by 2025, compared to 2014 levels. This would require significant efforts to reduce the amount of organic waste sent to landfills and to increase composting, anaerobic digestion, and other organic waste management practices.

SB 1383 also requires the CARB to establish methane emissions reduction targets for various sectors, including agriculture, landfill, and dairy operations. It also establishes requirements for reducing methane emissions from the oil and gas sector and from other sources of SLCPs, such as refrigerants and high-

GWP gases. The implementation of SB 1383 involves collaboration between the state, local governments, and the private sector to achieve the emissions reduction targets. The bill also includes provisions to support the development of local organic waste processing facilities and to provide incentives for the use of compost and other organic soil amendments in agriculture. SB 1383 is considered a significant step forward in California's efforts to address climate change and air pollution, particularly in reducing emissions of SLCPs, which have a significant impact on the state's overall carbon footprint (California State Legislature 2015-2016 Session 2016).

AB 1346, known as the SOREs act (small off-road engines), was signed on July 1, 2022, and bans the sale of gasoline powered small engines in California by 2024. These SOREs are primarily used for lawn and garden equipment. The bill states that SOREs emit high levels of NOx, ROG, and PM pollution and therefore contribute a large negative impact on public health (California State Legislature 2021-2022 Session 2021).

SB 1203, signed into law by Governor Gavin Newsom on September 27, 2022, mandates that all state agencies in California achieve net-zero greenhouse gas (GHG) emissions by January 1, 2035, or as soon as feasible thereafter. Under the bill's provisions, the Department of General Services (DGS), in collaboration with the CARB, must publish an annual GHG inventory of state agencies, starting by July 1, 2024, with subsequent reports published annually. This inventory will help track the progress of state agencies in reducing their GHG emissions over time.

Additionally, DGS is tasked with developing an action plan by January 1, 2026, which outlines the necessary steps, investments, and cost estimates for achieving net-zero emissions by 2035. This plan will be updated every two years beginning in 2028, ensuring the process stays on track and adapts to any new technological or policy developments. The efforts to reduce GHG emissions must be integrated into the sustainability roadmaps of all state agencies. This ensures that each department’s operations are aligned with the goal of reducing emissions, facilitating a coordinated approach across the state government. To ensure accountability, DGS will also report to the California Legislature on the progress toward achieving the net-zero goal, starting on December 31, 2027, and continuing every two years thereafter (California State Legislature 2022).

AB 2446, signed into law by Governor Gavin Newsom on September 16, 2022, addresses the environmental impact of construction materials by targeting embodied carbon emissions in California (California State Legislature 2021-2022 Session 2022). Embodied carbon refers to the greenhouse gas emissions associated with the entire lifecycle of construction materials, including extraction, manufacturing, transportation, installation, maintenance, and disposal. These emissions constitute a significant portion of a building's total carbon footprint, making their reduction crucial for achieving statewide climate goals.

AB 2446 mandates that the CARB develop a comprehensive framework to measure and reduce the carbon intensity of construction materials. The legislation sets ambitious targets, aiming for a 40% net reduction in embodied carbon emissions by 2035, with an interim goal of a 20% reduction by 2030. To support these objectives, CARB is required to establish a system that encourages the use of low-carbon

construction materials, potentially leveraging state and federal financial incentives to stimulate market demand.
The bill also stipulates those new non-residential buildings exceeding 10,000 square feet and residential projects comprising at least five units must submit life cycle assessments and product-specific Environmental Product Declarations (EPDs) for the building materials used. This requirement aims to enhance transparency and accountability in the construction industry regarding the environmental impact of materials (Das 2023).

Executive Orders Related to GHG Emissions

California's Executive Branch has taken several actions to reduce GHGs through Executive Orders. Although not regulatory, they set the tone for the state and guide the actions of state agencies.

Executive Order S-3-05. Former California Governor Arnold Schwarzenegger signed Executive Order S-3-05 on June 1, 2005, setting the following reduction targets for GHG emissions:

- By 2010, reduce greenhouse gas emissions to 2000 levels.
- By 2020, reduce greenhouse gas emissions to 1990 levels.
- By 2050, reduce greenhouse gas emissions to 80 percent below 1990 levels.

According to some scientists, the 2050 reduction target is crucial to achieve a stable climate, and the 2020 target serves as an intermediate goal. However, as the goals were set through an executive order, they are not legally binding on the private sector or local governments. However, since this executive order, AB 1279 has set stricter GHG emission reduction targets into law as discussed prior in this section (Schwarzenegger, Execuive Order S-3-05 2005).

Executive Order S-01-07 - Low Carbon Fuel Standard. On January 18, 2007, Executive Order S-01-07 was signed by the Governor to establish a statewide goal to reduce the carbon intensity of California's transportation fuels by at least 10 percent by 2020. This order created the Low Carbon Fuel Standard and directed various agencies to develop and propose protocols for measuring the life-cycle carbon intensity of transportation fuels. The CARB adopted the Low Carbon Fuel Standard on April 23, 2009, but it was challenged in court in 2011, resulting in a preliminary injunction against its implementation. The Ninth Circuit Court of Appeals lifted the injunction in 2012, and in 2013, the court held that the standard was not in conflict with federal law. However, in 2013, the Fifth District Court of Appeal ruled that CARB had failed to comply with CEQA and the APA when adopting the regulations for the Low Carbon Fuel Standard. The court allowed the regulations to remain operative while CARB worked to comply with the procedural requirements (Schwarzenegger, Executive Order S-01-07 2007).

Executive Order S-13-08. Executive Order S-13-08 states that California is likely to experience significant impacts from climate change, including altered precipitation patterns, rising sea levels, and increased temperatures. These impacts pose a serious threat to the state's economy, natural resources, and public health. In response to the order, the California Natural Resources Agency developed the first statewide climate change adaptation strategy in the US in 2009. The strategy analyzes the risks

associated with climate change in California and identifies strategies to help the state adapt to these changes. It also sets the direction for future research on this important issue (California Natural Resources Agency 2009).

Executive Order B-30-15. In April 2015, Governor Jerry Brown signed Executive Order B-30-15s which outlines several key provisions. First, it establishes a new greenhouse gas emission reduction target of 40 percent below 1990 levels by 2030 to ensure that California achieves its overall goal of reducing greenhouse gas emissions to 80 percent below 1990 levels by 2050. Second, all state agencies that have control over sources of greenhouse gas emissions are required to take measures, within their statutory authority, to achieve these reductions. Third, the California Air Resources Board is tasked with updating the Climate Change Scoping Plan to express the 2030 target in terms of million metric tons of carbon dioxide equivalent. Although the order doesn't have a direct impact on cities and counties, it will lead to the preparation of the new 2017 CARB Scoping Plan and regulations for meeting post-2020 reduction targets (E. Brown 2015).

Executive Order B-48-18. A directive signed by Governor Jerry Brown in September 2018 that sets a target of carbon neutrality for California by 2045. The order establishes goals for the state to achieve carbon neutrality through a variety of actions, including increasing renewable energy, promoting zero-emission vehicles, and investing in research and development of new clean technologies. The order also sets a goal for the state to achieve net-negative emissions beyond 2045, meaning that California would remove more greenhouse gases from the atmosphere than it emits. This executive order is part of California's broader effort to address climate change and reduce greenhouse gas emissions (G. E. Brown 2018).

Executive Order N-79-20. EV Stuff. This order set ambitious targets for transitioning to ZEVs in California. All new passenger cars and trucks sold in the state must be zero-emission by 2035. All medium- and heavy-duty vehicles should be zero-emission by 2045, where feasible, with a target of 2035 for drayage trucks. All off-road vehicles and equipment operations are to be zero-emission by 2035. The order also directed the California Air Resources Board to develop regulations to achieve these goals and mandated state agencies to accelerate the development of affordable fueling and charging infrastructure for ZEVs (Newsom, Executive Order N-79-20 2020).

Executive Order N-82-20. Signed by California Governor Gavin Newsom on October 7, 2020. The order sets a goal for the state to conserve 30% of California's land and coastal waters by 2030, to help combat climate change and protect biodiversity. The order establishes the California Biodiversity Collaborative to develop and implement a biodiversity strategic plan and directs state agencies to prioritize conservation and restoration efforts. The order also recognizes the importance of involving Native American tribes and local communities in conservation efforts and calls for increased funding and partnerships to support conservation efforts (Newsom, Executive Order N-82-20 2020).

California Regulations and Building Codes

California has a long history of adopting regulations to improve energy efficiency in new and remodeled buildings. These regulations have kept California's energy consumption relatively flat even with rapid population growth.

Title 24. California Code of Regulations Title 24 Part 6: California's Energy Efficiency Standards for Residential and Nonresidential Buildings, was first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption. The Title 24 standards cover a wide range of topics related to building energy efficiency, including building envelope design, lighting, mechanical systems, and more. The standards are periodically updated to reflect advances in technology and changes in state policy, with the most recent updates taking effect on January 1, 2020. The goal of the Title 24 standards is to reduce energy consumption in buildings (and as a result reduce GHG emissions) and promote sustainable design and construction practices (California Energy Comission n.d.).

Title 20. California Code of Regulations, Title 20: Division 2, Chapter 4, Article 4, Sections 1601-1608: Appliance Efficiency Regulations created a set of energy efficiency standards that apply to a variety of appliances and products sold or offered for sale in the state. The standards are designed to reduce energy consumption, save consumers money on their energy bills, and reduce GHG emissions. Title 20 covers products such as lighting fixtures, televisions, computers, battery chargers, and many other appliances and electronics. Manufacturers must ensure that their products meet the energy efficiency requirements before they can be sold in California. The standards are regularly updated to reflect advances in technology and to increase energy savings. (California Energy Comission n.d.)

California Green Building Standards Code, also known as CALGreen, is a set of mandatory standards that promote the design and construction of energy-efficient, water-efficient, and environmentally sustainable buildings. The standards apply to all newly constructed buildings and to alterations and additions to existing buildings. CALGreen covers various areas such as energy efficiency, water conservation, indoor air quality, materials conservation, and construction waste reduction. It also includes requirements for installing renewable energy systems and using low-emitting materials. CALGreen is updated periodically to reflect advances in green building practices and technologies. The latest version is the 2022 CALGreen code, effective January 1, 2023 (Department of General Services n.d.).

San Joaquin Valley Air Pollution Control District

SJVAPCD Climate Change Action Plan

On August 21, 2008, the SJVAPCD Governing Board approved the SJVAPCD's Climate Change Action Plan with the following goals and actions:

Goals:

- Assist local land-use agencies with CEQA issues relative to projects with GHG emissions increases.

- Assist Valley businesses in complying with mandates of AB 32.
- Ensure that climate protection measures do not cause increase in toxic or criteria pollutants that adversely impact public health or environmental justice communities.

Actions:

- Authorize the Air Pollution Control Officer to develop GHG significance threshold(s) or other mechanisms to address CEQA projects with GHG emissions increases. Begin the requisite public process, including public workshops, and develop recommendations for Governing Board consideration in the spring of 2009.
- Authorize the Air Pollution Control Officer to develop necessary regulations and instruments for establishment and administration of the San Joaquin Valley Carbon Exchange Bank for voluntary GHG reductions created in the Valley. Begin the requisite public process, including public workshops, and develop recommendations for Governing Board consideration in spring 2009.
- Authorize the Air Pollution Control Officer to enhance the SJVAPCD's existing criteria pollutant emissions inventory reporting system to allow businesses subject to AB32 emission reporting requirements to submit simultaneous streamlined reports to the SJVAPCD and the state of California with minimal duplication.
- Authorize the Air Pollution Control Officer to develop and administer voluntary GHG emission reduction agreements to mitigate proposed GHG increases from new projects.
- Direct the Air Pollution Control Officer to support climate protection measures that reduce GHG emissions and toxic and criteria pollutants. Oppose measures that result in a significant increase in toxic or criteria pollutant emissions in already impacted area (San Joaquin Valley Air Pollution Control District n.d.).

SJVAPCD CEQA Greenhouse Gas Guidance.

On December 17, 2009, the San Joaquin Valley Air Pollution Control District (SJVAPCD) Governing Board adopted two key policies: "Guidance for Valley Land-use Agencies in Addressing GHG Emission Impacts for New Projects under CEQA" and "District Policy—Addressing GHG Emission Impacts for Stationary Source Projects Under CEQA When Serving as the Lead Agency." The SJVAPCD determined that current scientific methods are insufficient to accurately quantify the precise impact of project-specific greenhouse gas (GHG) emissions on global climate change. However, it concluded that GHG emissions contribute cumulatively to climate change and that, without mitigation, these cumulative effects could be significant. As a result, the District recommended that all projects reduce GHG emissions through project design or mitigation measures.

The SJVAPCD's approach aims to simplify the process of assessing the significance of GHG emissions from proposed projects. Projects exempt from CEQA requirements or that comply with an approved GHG reduction plan or mitigation program would have a less than significant cumulative impact. These plans or programs must be formally adopted by the relevant public agency, supported by a certified final CEQA document, and specifically authorized by law.

To further streamline assessments, the District established Best Performance Standards (BPS), which set performance-based benchmarks for reducing GHG emissions. Projects that meet BPS requirements would not be required to quantify their GHG emissions and would automatically be considered to have a

less than significant cumulative impact. However, projects that do not comply with BPS must quantify their emissions and demonstrate a 29% reduction in GHG emissions compared to business-as-usual (BAU), aligning with CARB's AB 32 Scoping Plan. Additionally, all projects requiring an Environmental Impact Report (EIR) under CEQA must quantify their GHG emissions, regardless of whether they incorporate BPS (San Joaquin Valley Air Pollution Control District 2009).

For stationary source permitting projects, BPS is defined as the most stringent feasible method of controlling GHG emissions, including equipment type, design, operational efficiency, and maintenance practices that are already proven effective in practice. For land development projects, BPS consists of GHG reduction strategies, project design features, and land-use planning decisions that collectively reduce emissions by at least 29% compared to business-as-usual scenarios. To aid in implementation, the SJVAPCD will compile and maintain a list of all approved BPS to assist in determining whether a proposed project has met the required GHG reductions (San Joaquin Valley Air Pollution Control District 2009).

Fresno Council of Governments Priority Climate Action Plan

The Fresno Council of Governments (FCOG) Priority Climate Action Plan (PCAP) 2024 outlines several regulations and rules related to GHG emissions. The PCAP prioritizes GHG reduction measures in key sectors, including transportation, agriculture, building energy, and waste management. Key regulatory and policy measures include:

Transportation Sector:

- Development of a robust electric vehicle (EV) charging network in Fresno County to facilitate greater adoption of EVs.
- Conversion of municipal fleets (including transit vehicles) to ZEVs.
- Expansion of bike and pedestrian infrastructure to promote alternative mobility options such as e-bikes and scooters.
- Enhancement of public transportation systems to increase accessibility and sustainability.
- Implementation of carpool, vanpool, and other shared mobility incentives to reduce VMT

Agricultural Sector:

- Reduction of GHG emissions from manure management in livestock and poultry operations through state and federal incentive programs.
- Elimination of agricultural burning in compliance with Senate Bill 705, with incentives for alternative disposal methods like chipping or soil incorporation.
- Electrification of agricultural equipment, such as tractors and irrigation pumps, to cut down emissions from off-road diesel engines.

Building Energy Sector:

- Encouragement of energy efficiency retrofits for residential and commercial buildings.
- Incentives for on-site renewable energy generation such as solar and wind power.
- Promotion of high-efficiency water heating systems to reduce energy consumption.
- Incorporation of green building policies based on Leadership in Energy and Environmental Design (LEED) or Green Globes Rating System.

Waste Management Sector:

- Implementation of waste diversion programs to reduce methane emissions from landfills and wastewater treatment plants.
- Expansion of construction and demolition waste recycling programs to meet or exceed CALGreen voluntary guidelines.

The PCAP provides a framework for reducing GHG emissions in Fresno County by aligning with state and federal regulations, leveraging available funding, and encouraging stakeholder participation. It serves as the foundation for a more comprehensive CCAP that will be developed over the 18 months after its publication (Fresno Council of Governments 2024).

Impacts & Mitigation Measures

Methodology

Short-term (construction) and long-term (operational) GHG emissions that would result from the project were estimated using the CalEEMod version 2022.1.1.38 web-based platform.

Short-term Impacts

CalEEMod modeling accounted for emissions generated during demolition, site preparation, grading, paving, building construction, and the application of architectural coatings. Construction phase duration estimates were provided by the District's construction manager. Construction of Phase 1 is expected to commence in June 2028 and conclude in August 2029. Construction of Phase 2 is expected to commence in June 2029 and conclude in August 2029. Incorporating these refined construction schedules ensures a more accurate representation of the anticipated construction timeline while preserving consistency with CalEEMod's standard equipment and operational assumptions.

Since detailed construction equipment requirements have not been determined for the project, the analysis relied on default assumptions provided in the CalEEMod model. The assumptions and modeling results are included in Appendix A of this report.

Long-term Impacts

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

Non-mobile operational emissions were estimated using CalEEMod default factors for area sources, energy consumption, water and wastewater conveyance, and solid waste generation/disposal, applied to the proposed land uses. These defaults include statewide or region-appropriate GHG emission factors for

electricity generation, natural gas use, waste disposal, and water system energy intensity, and provide a conservative representation of long-term operational activity at the reconfigured school campus. These emission results represent the operational GHG emissions that the proposed reconstructed facility would generate during operation. Due to lack of information, these emission results do not reflect the net change in GHG emissions from operation of the existing school compared to the proposed remodeled school. Due to the age of the existing campus built in 1956 compared to the energy, heating/cooling, and water efficiency standards of the 2025 Title 24 code, operation of the proposed project would result in a net reduction of long-term operational GHG emissions.

All model inputs, assumptions, and CalEEMod output files are included in Appendix A of this report for reference.

Thresholds of Significance

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

a. Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment; or,
b. Conflict with any applicable plan, policy or regulation of an agency adopted to reduce emissions of GHGs.

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

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

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

lack of substantial evidence to adequately demonstrate a link between the data contained in the AB 32 Scoping Plan and individual development projects. Alternatively, the Court identified potential options for evaluating GHG impacts for individual development projects, which included a qualitative approach based on consistency with statewide, regional, and local plans (Supreme Court of California 2015).

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

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

Project Impacts

Impact GHG-A.	***Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? and***

Impact GHG-B.	***Would the project conflict with any applicable plan, policy or regulation of an agency adopted to reduce greenhouse gases emissions?***

Below are a discussion and quantification of the project's GHG emissions.

Short-term Construction

Construction-generated GHG emissions are summarized in Table 12. As shown, construction of the facility would generate about 377.82 $MTCO_2e$. Amortized GHG emissions, when averaged over an assumed 30-year life of the project, would total approximately 12.58 $MTCO_2e$/year. There would also be a small amount of GHG emissions from waste generated during construction; however, this amount is speculative. Construction-generated emissions would vary, depending on the final construction schedules, equipment required, and activities conducted.

Table 12. Construction GHG Emissions

Construction Year	Annual Emissions ($MTCO_2e$/Year)
Phase 1 2028	182.10
Phase 1 2029	144.04
Phase 2 2029	51.18
Total Construction Emissions:	377.32
Amortized Net Change in Construction Emissions[1]:	12.58

1. Amortized emissions are quantified based on an estimated 30-year project life.
Refer to Appendix A for emissions modeling assumptions and results.

Long-term Operation

Table 13 summarizes the project's increase of operational GHG emissions for the operational years per phase of Phase 1 2029 and Phase 2 2029, compared to existing operation of current land uses. Including amortized construction emissions, total annual GHG emissions are estimated at 119.39 metric tons of CO_2 equivalent ($MTCO_2e$) for the total project, with 110.73 $MTCO_2e$ from Phase 1 (2029) and 8.66 $MTCO_2e$ from Phase 2 (2029). Most emissions, 87.15%, would come from energy use and 10.83% would come from waste generation sources, while mobile sources would be 0% as the project would not increase student capacity/enrollment and resulting mobile vehicle trips.

Table 13. Operational GHG Emissions (Unmitigated)

	GHG Emissions ($MTCO_2e$ per year)[1]		
Emissions Source	**Phase 1 (2029)**	**Phase 2 (2029)**	**Percent of Total GHG Emissions**
Mobile Sources	0.00	0.00	0.00%
Area Sources	0.42	0.00	0.39%
Energy Use	86.23	6.85	87.15%
Water Use	1.62	0.10	1.61%
Waste Generation	11.57	0.00	10.83%
Refrigerant	0.02	0.00	0.02%
Total Operational:	99.86	6.95	
Amortized Construction Emissions:	10.87	1.71	
Total Emissions per Phase:	110.73	8.66	
Total Project Operational Emissions:	119.39		

1. Project-generated emissions were quantified using the CalEEMod computer program.
Refer to Appendix A for modeling results and assumptions.

Consistency With Applicable Plans

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

operational GHG emissions are included the CARB's 2022 Climate Change Scoping Plan (California Air Resources Board 2023). The project's consistency with these plans is further detailed below.

CARB's 2022 Climate Change Scoping Plan

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

Key strategies to achieve SB 32's goals include promoting sustainable communities through zero net energy buildings and enhanced transportation options that reduce vehicle miles traveled (VMT). Additional measures focus on increasing the use of low-carbon fuels and cleaner vehicles. Analysis of consistency with measures from the CARB's 2022 Scoping Plan are discussed below in Table 14.

Table 14. Consistency Analysis with CARB's 2022 Scoping Plan

Measure/Action	Consistency Analysis
Smart Growth/VMT Reduction: VMT per capita reduced 25% below 2019 levels by 2030, and 30% below 2019 levels by 2045.	**Consistent.** The project would reconstruct an existing elementary school with no increase in capacity, users, or vehicle trips.
Light-duty Vehicle (LDV) Zero Emission Vehicles (ZEVs): 100% of Light Duty Vehicle sales by 2035.	**Consistent.** The project site is owned and operated by the Fresno Unified School District. As vehicles are retired towards 2035, the District would purchase ZEV LDVs, as required by State regulations. The project site will be equipped with EV charger equipped parking stalls per CalGreen code to support ZEV conversion.
Truck ZEVs: 100% medium duty (MDV)/HDV sales are ZEV by 2040.	**Consistent.** The project site is owned and operated by the Fresno Unified School District. As vehicles are retired towards 2040, the District would purchase ZEV LDVs, as required by State regulations. The project site will be equipped with EV charger equipped parking stalls per CalGreen code to support ZEV conversion.
New Residential and Commercial Buildings: All electric appliances installed for commercial development starting 2029	**Consistent with Mitigation.** Despite the Project starting before 2029, to align with CARB's GHG reduction goals, the project would implement MM GHG-1 prioritize electrification and reduce the use natural gas. Additionally, the project would comply with the requirements listed in Title 24 of the California Building Standards Code which require and/or promote energy-efficient appliances.
Construction Equipment: 25% of energy demand electrified by 2030 and 75% electrified by 2045.	**Not feasible.** Electric construction equipment and electrical power sources are not available in the Project region. The project is therefore **Consistent**.

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

(California Air Resources Board 2023)

As discussed in Table 14, the Project is consistent with all applicable measures/actions of the CARB 2022 Scoping Plan.

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

FCOG 2022 Regional Transportation Plan and Sustainable Communities Strategies

The FCOG's 2022 RTP/SCS outlines transportation strategies aimed at reducing regional GHG emissions. Based on the rationale in this study, the project would not increase vehicle miles traveled (VMT), demonstrating that the project aligns with planned growth and the objectives set forth in the FCOG's 2022 RTP/SCS. Analysis of all relevant measures is shown below in Table 15 below.

Table 15. Consistency Analysis with FCOG's Transportation Plan and Sustainable Communities Goals

Goal	Project Consistency
Goal 1: Improved mobility and accessibility for all.	**Consistent.** Though the project would not add an additional bus stop near its location, the project site is approximately 0.25 miles south of several City bus stations along E. Clinton Avenue. There is a dedicated bike lane along N. Maple Avenue along the west perimeter of the site. Operation of the school will also include school bussing of students.
Goal 2: Vibrant communities that are accessible by sustainable transportation options.	**Consistent.** As mentioned previously, the project site is near City bus stations, a bike lane, and will bus students to school.
Goal 3: A safe, well-maintained, efficient, and climate-resilient multimodal transportation network.	**Consistent.** As mentioned previously, the project site is near City bus stations, a bike lane, and will bus students to school.
Goal 4: A transportation network that supports a sustainable and vibrant economy.	**Consistent.** As mentioned previously, the project site is near City bus stations, a bike lane, and will bus students to school.

Goal 5: A region embracing clean transportation, technology, and innovation.	**Consistent.** The Project would be constructed in compliance with 2025 Title 24 code EV parking spaces. A bike lane is located along N. Maple Avenue.
(Fresno Council of Governments 2022)	

As discussed in Table 15, the Project is consistent with all applicable goals of the FCOG's PCAP GHG reduction goals.

FCOG Priority Climate Action Plan

The FCOG's PCAP outlines five draft measures for the transportation sector, four for the agricultural sector, ten for the building energy sector, and four for the waste sector. Analysis of consistency with relevant measures are shown below in Table 16.

Table 16. Consistency Analysis with FCOG's Priority Climate Action Plan

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

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

As discussed in Table 16, the Project is consistent with all applicable measures or the intent of the FCOG's PCAP GHG reduction measures that do not directly apply to the project.

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

Mitigation Measures

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

Significance After Mitigation

Mitigation Measure GHG-1 would prioritize the construction of electrical mechanical systems, appliances, and other infrastructure in place of the use of natural gas. With this mitigations in place, and as discussed above, the proposed project would align with CARB's 2022 Climate Change Scoping Plan, and the

FCOG's 2022 RTP/SCS, the FCOG's PCAP to contribute its fair share toward achieving the State's carbon neutrality goal by 2045, as outlined in Executive Order B-55-18.

With mitigation, the project's GHG emissions would not result in significant environmental impacts or conflict with applicable GHG reduction policies, plans, or regulations, therefore this impact would be considered **less than significant with mitigation incorporated**.

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Appendix A.1: Phase 1 CalEEMod Emission Modeling

Norseman ES Modernization - Phase 1 - 07/01/2026 Detailed Report

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1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	Norseman ES Modernization - Phase 1 - 07/01/2026
Construction Start Date	6/1/2028
Operational Year	2029
Lead Agency	—
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	2.70000
Precipitation (days)	25.4000
Location	36.76784608456633, -119.7437022474895
County	Fresno
City	Fresno
Air District	San Joaquin Valley APCD
Air Basin	San Joaquin Valley
TAZ	2464
EDFZ	5
Electric Utility	Pacific Gas & Electric Company
Gas Utility	Pacific Gas & Electric

Data Field	Value
App Version	2022.1.1.45

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
Elementary School	28.5080	1000sqft	0.65445	28,508.0	0.00000	0.00000	—	—
Parking Lot	60.8550	1000sqft	1.39704	0.00000	0.00000	0.00000	—	—
Other Non-Asphalt Surfaces	35.8510	1000sqft	0.82303	0.00000	27,864.0	27,864.0	—	—

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.	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—
Unmit.	13.3662	22.9683	25.8308	0.06429	0.92138	8.35593	9.27731	4.53622	7,735.60
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—

Un/Mit.	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5T	CO2e
Unmit.	1.11757	9.34964	11.9980	0.02353	0.28554	0.08082	0.36635	0.28236	2,330.89
Average Daily (Max)	—	—	—	—	—	—	—	—	—
Unmit.	0.85044	4.28962	5.33459	0.01053	0.14337	0.23410	0.37747	0.21669	1,099.89
Annual (Max)	—	—	—	—	—	—	—	—	—
Unmit.	0.15521	0.78286	0.97356	0.00192	0.02616	0.04272	0.06889	0.03955	182.100
Exceeds (Daily Max)	—	—	—	—	—	—	—	—	—
Threshold	100.0000	100.0000	100.0000	100.0000	—	—	100.0000	100.0000	—
Unmit.	No	No	No	No	—	—	No	No	—
Exceeds (Average Daily)	—	—	—	—	—	—	—	—	—
Threshold	100.0000	100.0000	100.0000	100.0000	—	—	100.0000	100.0000	—
Unmit.	No	No	No	No	—	—	No	No	—
Exceeds (Annual)	—	—	—	—	—	—	—	—	—
Threshold	10.00000	10.00000	100.0000	27.0000	—	—	15.0000	15.0000	—
Unmit.	No	No	No	No	Yes	Yes	No	No	—

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	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5T	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—
2028	2.50329	22.9683	25.8308	0.06429	0.92138	8.35593	9.27731	4.53622	7,735.60
2029	13.3662	8.99064	11.9751	0.02353	0.25996	0.08161	0.34077	0.25883	2,335.28
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—
2028	1.11757	9.34964	11.9980	0.02353	0.28554	0.08082	0.36635	0.28236	2,330.89
2029	1.07684	9.00159	11.9139	0.02353	0.25996	0.08082	0.34077	0.25883	2,327.76
Average Daily	—	—	—	—	—	—	—	—	—
2028	0.49904	4.28962	5.33459	0.01053	0.14337	0.23410	0.37747	0.21669	1,099.89
2029	0.85044	3.37689	4.51607	0.00875	0.09822	0.03101	0.12923	0.09788	870.022
Annual	—	—	—	—	—	—	—	—	—
2028	0.09108	0.78286	0.97356	0.00192	0.02616	0.04272	0.06889	0.03955	182.100
2029	0.15521	0.61628	0.82418	0.00160	0.01792	0.00566	0.02358	0.01786	144.042

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	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5T	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—
2028	2.39913	20.2028	24.6142	0.04776	0.87414	7.59858	8.47272	4.28538	5,189.60
2029	13.3585	8.88672	11.6062	0.02312	0.25913	0.00000	0.25913	0.23840	2,208.60
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—

Year	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5T	CO2e
2028	1.07850	9.22917	11.6712	0.02312	0.28471	0.00000	0.28471	0.26194	2,208.97
2029	1.04039	8.88672	11.6062	0.02312	0.25913	0.00000	0.25913	0.23840	2,208.60
Average Daily	—	—	—	—	—	—	—	—	—
2028	0.48198	4.17308	5.18409	0.00995	0.14180	0.18496	0.32675	0.20268	987.472
2029	0.83588	3.33717	4.39433	0.00860	0.09793	0.00000	0.09793	0.09009	824.307
Annual	—	—	—	—	—	—	—	—	—
2028	0.08796	0.76159	0.94610	0.00182	0.02588	0.03375	0.05963	0.03699	163.487
2029	0.15255	0.60903	0.80197	0.00157	0.01787	0.00000	0.01787	0.01644	136.473

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	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5T	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—
2028	0.10416	2.76551	1.21662	0.01653	0.04724	0.75735	0.80459	0.25084	2,545.99
2029	0.04818	0.10392	0.41231	0.00041	0.00082	0.08161	0.08164	0.02042	126.683
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—
2028	0.03907	0.12046	0.32679	0.00041	0.00082	0.08082	0.08164	0.02042	121.924
2029	0.03644	0.11487	0.30772	0.00041	0.00082	0.08082	0.08164	0.02042	119.161
Average Daily	—	—	—	—	—	—	—	—	—
2028	0.01707	0.11654	0.15050	0.00059	0.00157	0.04915	0.05072	0.01401	112.421
2029	0.01456	0.03973	0.12174	0.00015	0.00029	0.03101	0.03131	0.00779	45.7148

Year	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5T	CO2e
Annual	—	—	—	—	—	—	—	—	—
2028	0.00311	0.02127	0.02747	0.00011	0.00029	0.00897	0.00926	0.00256	18.6126
2029	0.00266	0.00725	0.02222	0.00003	0.00005	0.00566	0.00571	0.00142	7.56861

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.	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—
Unmit.	0.88398	0.35613	1.53026	0.00215	0.02848	0.00000	0.02848	0.02794	605.733
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—
Unmit.	0.68027	0.34570	0.29039	0.00207	0.02627	0.00000	0.02627	0.02627	600.616
Average Daily (Max)	—	—	—	—	—	—	—	—	—
Unmit.	0.78073	0.35084	0.90183	0.00211	0.02736	0.00000	0.02736	0.02709	603.140
Annual (Max)	—	—	—	—	—	—	—	—	—
Unmit.	0.14248	0.06403	0.16458	0.00039	0.00499	0.00000	0.00499	0.00494	99.8567
Exceeds (Daily Max)	—	—	—	—	—	—	—	—	—
Threshold	100.0000	100.0000	100.0000	100.0000	—	—	100.0000	100.0000	—
Unmit.	No	No	No	No	—	—	No	No	—
Exceeds (Average Daily)	—	—	—	—	—	—	—	—	—

Un/Mit.	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5T	CO2e
Threshold	100.0000	100.0000	100.0000	100.0000	—	—	100.0000	100.0000	—
Unmit.	No	No	No	No	—	—	No	No	—
Exceeds (Annual)	—	—	—	—	—	—	—	—	—
Threshold	10.00000	10.00000	100.0000	27.0000	—	—	15.0000	15.0000	—
Unmit.	No	No	No	No	Yes	No	No	No	—

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	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—
Mobile	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Area	0.86496	0.01043	1.23988	0.00007	0.00220	—	0.00220	0.00166	5.11694
Energy	0.01901	0.34570	0.29039	0.00207	0.02627	—	0.02627	0.02627	520.833
Water	—	—	—	—	—	—	—	—	9.79328
Waste	—	—	—	—	—	—	—	—	69.8797
Refrig.	—	—	—	—	—	—	—	—	0.11012
Total	0.88398	0.35613	1.53026	0.00215	0.02848	0.00000	0.02848	0.02794	605.733
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—
Mobile	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Area	0.66126	—	—	—	—	—	—	—	—
Energy	0.01901	0.34570	0.29039	0.00207	0.02627	—	0.02627	0.02627	520.833

Sector	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5T	CO2e
Water	—	—	—	—	—	—	—	—	9.79328
Waste	—	—	—	—	—	—	—	—	69.8797
Refrig.	—	—	—	—	—	—	—	—	0.11012
Total	0.68027	0.34570	0.29039	0.00207	0.02627	0.00000	0.02627	0.02627	600.616
Average Daily	—	—	—	—	—	—	—	—	—
Mobile	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Area	0.76172	0.00514	0.61145	0.00004	0.00109	—	0.00109	0.00082	2.52342
Energy	0.01901	0.34570	0.29039	0.00207	0.02627	—	0.02627	0.02627	520.833
Water	—	—	—	—	—	—	—	—	9.79328
Waste	—	—	—	—	—	—	—	—	69.8797
Refrig.	—	—	—	—	—	—	—	—	0.11012
Total	0.78073	0.35084	0.90183	0.00211	0.02736	0.00000	0.02736	0.02709	603.140
Annual	—	—	—	—	—	—	—	—	—
Mobile	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Area	0.13901	0.00094	0.11159	0.00001	0.00020	—	0.00020	0.00015	0.41778
Energy	0.00347	0.06309	0.05300	0.00038	0.00479	—	0.00479	0.00479	86.2299
Water	—	—	—	—	—	—	—	—	1.62139
Waste	—	—	—	—	—	—	—	—	11.5694
Refrig.	—	—	—	—	—	—	—	—	0.01823
Total	0.14248	0.06403	0.16458	0.00039	0.00499	0.00000	0.00499	0.00494	99.8567

3. Construction Emissions Details

3.1. Demolition (2028)

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	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.32747	12.1706	14.4591	0.02393	0.44950	—	0.44950	0.41354	2,503.08
Demolition	—	—	—	—	—	0.34495	0.34495	0.05224	—
Onsite truck	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	0.10911	1.00032	1.18842	0.00197	0.03695	—	0.03695	0.03399	205.733
Demolition	—	—	—	—	—	0.02835	0.02835	0.00429	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01991	0.18256	0.21689	0.00036	0.00674	—	0.00674	0.00620	34.0614
Demolition	—	—	—	—	—	0.00517	0.00517	0.00078	—
Onsite truck	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	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—
Worker	0.04291	0.02045	0.36848	0.00000	0.00000	0.06800	0.06800	0.01594	72.3925
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00494	0.30653	0.07848	0.00185	0.00529	0.07416	0.07945	0.02559	273.800
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—
Worker	0.00314	0.00190	0.02491	0.00000	0.00000	0.00550	0.00550	0.00129	5.47150
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00039	0.02635	0.00650	0.00015	0.00043	0.00602	0.00645	0.00208	22.4849
Annual	—	—	—	—	—	—	—	—	—
Worker	0.00057	0.00035	0.00455	0.00000	0.00000	0.00100	0.00100	0.00023	0.90587
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00007	0.00481	0.00119	0.00003	0.00008	0.00110	0.00118	0.00038	3.72263

3.2. Site Preparation (2028)

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	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.04655	8.41892	10.7072	0.02508	0.35834	—	0.35834	0.32967	2,724.91
Dust From Material Movement	—	—	—	—	—	0.49631	0.49631	0.05359	—
Onsite truck	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	0.04301	0.34598	0.44002	0.00103	0.01473	—	0.01473	0.01355	111.983
Dust From Material Movement	—	—	—	—	—	0.02040	0.02040	0.00220	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.00785	0.06314	0.08030	0.00019	0.00269	—	0.00269	0.00247	18.5400
Dust From Material Movement	—	—	—	—	—	0.00372	0.00372	0.00040	—
Onsite truck	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	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—
Worker	0.02574	0.01227	0.22109	0.00000	0.00000	0.04080	0.04080	0.00956	43.4355
Vendor	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
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—
Worker	0.00094	0.00057	0.00747	0.00000	0.00000	0.00165	0.00165	0.00039	1.64145
Vendor	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
Annual	—	—	—	—	—	—	—	—	—
Worker	0.00017	0.00010	0.00136	0.00000	0.00000	0.00030	0.00030	0.00007	0.27176
Vendor	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

3.3. Grading (2028)

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	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5T	CO2e
Off-Road Equipment	1.35258	11.7838	13.9071	0.02268	0.51580	—	0.51580	0.47453	2,464.69
Dust From Material Movement	—	—	—	—	—	7.10226	7.10226	3.42758	—
Onsite truck	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	0.02594	0.22599	0.26671	0.00043	0.00989	—	0.00989	0.00910	47.2681
Dust From Material Movement	—	—	—	—	—	0.13621	0.13621	0.06573	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.00473	0.04124	0.04867	0.00008	0.00181	—	0.00181	0.00166	7.82577
Dust From Material Movement	—	—	—	—	—	0.02486	0.02486	0.01200	—
Onsite truck	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	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—
Worker	0.03433	0.01636	0.29478	0.00000	0.00000	0.05440	0.05440	0.01275	57.9140
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.04409	2.73688	0.70076	0.01653	0.04724	0.66214	0.70938	0.22852	2,444.64
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—
Worker	0.00059	0.00035	0.00465	0.00000	0.00000	0.00103	0.00103	0.00024	1.02135
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00082	0.05489	0.01354	0.00032	0.00091	0.01254	0.01345	0.00434	46.8435
Annual	—	—	—	—	—	—	—	—	—
Worker	0.00011	0.00006	0.00085	0.00000	0.00000	0.00019	0.00019	0.00004	0.16910
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00015	0.01002	0.00247	0.00006	0.00017	0.00229	0.00245	0.00079	7.75547

3.4. Building Construction (2028)

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	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5T	CO2e
Off-Road Equipment	1.07850	9.22917	11.6712	0.02312	0.28471	—	0.28471	0.26194	2,208.97
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.07850	9.22917	11.6712	0.02312	0.28471	—	0.28471	0.26194	2,208.97
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Average Daily	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.30392	2.60078	3.28894	0.00652	0.08023	—	0.08023	0.07381	622.488
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.05547	0.47464	0.60023	0.00119	0.01464	—	0.01464	0.01347	103.060
Onsite truck	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	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—
Worker	0.04110	0.01959	0.35295	0.00000	0.00000	0.06514	0.06514	0.01527	69.3425
Vendor	0.00309	0.08993	0.04048	0.00041	0.00082	0.01568	0.01650	0.00516	60.2992
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5T	CO2e
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—
Worker	0.03608	0.02497	0.28456	0.00000	0.00000	0.06514	0.06514	0.01527	61.6098
Vendor	0.00299	0.09549	0.04223	0.00041	0.00082	0.01568	0.01650	0.00516	60.3137
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Average Daily	—	—	—	—	—	—	—	—	—
Worker	0.01032	0.00624	0.08181	0.00000	0.00000	0.01806	0.01806	0.00423	17.9691
Vendor	0.00087	0.02624	0.01161	0.00012	0.00023	0.00436	0.00459	0.00144	16.9892
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—
Worker	0.00188	0.00114	0.01493	0.00000	0.00000	0.00330	0.00330	0.00077	2.97498
Vendor	0.00016	0.00479	0.00212	0.00002	0.00004	0.00080	0.00084	0.00026	2.81275
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

3.5. Building Construction (2029)

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	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.04039	8.88672	11.6062	0.02312	0.25913	—	0.25913	0.23840	2,208.60

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5T	CO2e
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.04039	8.88672	11.6062	0.02312	0.25913	—	0.25913	0.23840	2,208.60
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Average Daily	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.36852	3.14774	4.11101	0.00819	0.09179	—	0.09179	0.08444	782.302
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.06725	0.57446	0.75026	0.00149	0.01675	—	0.01675	0.01541	129.519
Onsite truck	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	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—
Worker	0.03846	0.01729	0.32911	0.00000	0.00000	0.06514	0.06514	0.01527	68.0529
Vendor	0.00268	0.08663	0.03976	0.00041	0.00082	0.01568	0.01650	0.00516	58.6301
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5T	CO2e
Worker	0.03397	0.02267	0.26621	0.00000	0.00000	0.06514	0.06514	0.01527	60.5031
Vendor	0.00247	0.09219	0.04151	0.00041	0.00082	0.01568	0.01650	0.00516	58.6582
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Average Daily	—	—	—	—	—	—	—	—	—
Worker	0.01213	0.00703	0.09545	0.00000	0.00000	0.02270	0.02270	0.00531	22.1739
Vendor	0.00091	0.03182	0.01434	0.00015	0.00029	0.00548	0.00577	0.00181	20.7658
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—
Worker	0.00221	0.00128	0.01742	0.00000	0.00000	0.00414	0.00414	0.00097	3.67113
Vendor	0.00017	0.00581	0.00262	0.00003	0.00005	0.00100	0.00105	0.00033	3.43802
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

3.6. Paving (2029)

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	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.60245	5.41905	8.18783	0.01181	0.18968	—	0.18968	0.17450	1,247.67
Paving	0.33275	—	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5T	CO2e
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01816	0.16331	0.24676	0.00036	0.00572	—	0.00572	0.00526	37.6011
Paving	0.01003	—	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.00331	0.02980	0.04503	0.00006	0.00104	—	0.00104	0.00096	6.22529
Paving	0.00183	—	—	—	—	—	—	—	—
Onsite truck	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	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—
Worker	0.04818	0.02166	0.41231	0.00000	0.00000	0.08161	0.08161	0.01913	85.2554
Vendor	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
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5T	CO2e
Worker	0.00129	0.00075	0.01017	0.00000	0.00000	0.00242	0.00242	0.00057	2.36352
Vendor	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
Annual	—	—	—	—	—	—	—	—	—
Worker	0.00024	0.00014	0.00186	0.00000	0.00000	0.00044	0.00044	0.00010	0.39131
Vendor	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

3.7. Architectural Coating (2029)

3.7.1. Onsite - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.10236	0.79416	1.11216	0.00173	0.01284	—	0.01284	0.01181	133.968
Architectural Coatings	13.2562	—	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5T	CO2e
Off-Road Equipment	0.00337	0.02611	0.03656	0.00006	0.00042	—	0.00042	0.00039	4.40442
Architectural Coatings	0.43582	—	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.00061	0.00476	0.00667	0.00001	0.00008	—	0.00008	0.00007	0.72920
Architectural Coatings	0.07954	—	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

3.7.2. Offsite - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—
Worker	0.00769	0.00346	0.06582	0.00000	0.00000	0.01303	0.01303	0.00305	13.6106
Vendor	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
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—
Worker	0.00023	0.00013	0.00177	0.00000	0.00000	0.00042	0.00042	0.00010	0.41163
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5T	CO2e
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—
Worker	0.00004	0.00002	0.00032	0.00000	0.00000	0.00008	0.00008	0.00002	0.06815
Vendor	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

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	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—
Elementary School	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Parking Lot	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Other Non-Asphalt Surfaces	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
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5T	CO2e
Elementary School	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Parking Lot	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Other Non-Asphalt Surfaces	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
Annual	—	—	—	—	—	—	—	—	—
Elementary School	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Parking Lot	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Other Non-Asphalt Surfaces	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

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	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—
Elementary School	—	—	—	—	—	—	—	—	77.1285
Parking Lot	—	—	—	—	—	—	—	—	30.0867

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5T	CO2e
Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	0.00000
Total	—	—	—	—	—	—	—	—	107.215
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—
Elementary School	—	—	—	—	—	—	—	—	77.1285
Parking Lot	—	—	—	—	—	—	—	—	30.0867
Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	0.00000
Total	—	—	—	—	—	—	—	—	107.215
Annual	—	—	—	—	—	—	—	—	—
Elementary School	—	—	—	—	—	—	—	—	12.7695
Parking Lot	—	—	—	—	—	—	—	—	4.98120
Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	0.00000
Total	—	—	—	—	—	—	—	—	17.7507

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	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—
Elementary School	0.01901	0.34570	0.29039	0.00207	0.02627	—	0.02627	0.02627	413.618

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5T	CO2e
Parking Lot	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000
Other Non-Asphalt Surfaces	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000
Total	0.01901	0.34570	0.29039	0.00207	0.02627	—	0.02627	0.02627	413.618
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—
Elementary School	0.01901	0.34570	0.29039	0.00207	0.02627	—	0.02627	0.02627	413.618
Parking Lot	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000
Other Non-Asphalt Surfaces	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000
Total	0.01901	0.34570	0.29039	0.00207	0.02627	—	0.02627	0.02627	413.618
Annual	—	—	—	—	—	—	—	—	—
Elementary School	0.00347	0.06309	0.05300	0.00038	0.00479	—	0.00479	0.00479	68.4792
Parking Lot	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000
Other Non-Asphalt Surfaces	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000
Total	0.00347	0.06309	0.05300	0.00038	0.00479	—	0.00479	0.00479	68.4792

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	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—
Consumer Products	0.61768	—	—	—	—	—	—	—	—
Architectural Coatings	0.04358	—	—	—	—	—	—	—	—
Landscape Equipment	0.20370	0.01043	1.23988	0.00007	0.00220	—	0.00220	0.00166	5.11694
Total	0.86496	0.01043	1.23988	0.00007	0.00220	—	0.00220	0.00166	5.11694
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—
Consumer Products	0.61768	—	—	—	—	—	—	—	—
Architectural Coatings	0.04358	—	—	—	—	—	—	—	—
Total	0.66126	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—
Consumer Products	0.11273	—	—	—	—	—	—	—	—
Architectural Coatings	0.00795	—	—	—	—	—	—	—	—
Landscape Equipment	0.01833	0.00094	0.11159	0.00001	0.00020	—	0.00020	0.00015	0.41778
Total	0.13901	0.00094	0.11159	0.00001	0.00020	—	0.00020	0.00015	0.41778

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	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—
Elementary School	—	—	—	—	—	—	—	—	8.63248
Parking Lot	—	—	—	—	—	—	—	—	0.00000
Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	1.16079
Total	—	—	—	—	—	—	—	—	9.79328
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—
Elementary School	—	—	—	—	—	—	—	—	8.63248
Parking Lot	—	—	—	—	—	—	—	—	0.00000
Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	1.16079
Total	—	—	—	—	—	—	—	—	9.79328
Annual	—	—	—	—	—	—	—	—	—
Elementary School	—	—	—	—	—	—	—	—	1.42921
Parking Lot	—	—	—	—	—	—	—	—	0.00000
Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	0.19218
Total	—	—	—	—	—	—	—	—	1.62139

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	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—
Elementary School	—	—	—	—	—	—	—	—	69.8797
Parking Lot	—	—	—	—	—	—	—	—	0.00000
Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	0.00000
Total	—	—	—	—	—	—	—	—	69.8797
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—
Elementary School	—	—	—	—	—	—	—	—	69.8797
Parking Lot	—	—	—	—	—	—	—	—	0.00000
Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	0.00000
Total	—	—	—	—	—	—	—	—	69.8797
Annual	—	—	—	—	—	—	—	—	—
Elementary School	—	—	—	—	—	—	—	—	11.5694
Parking Lot	—	—	—	—	—	—	—	—	0.00000
Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	0.00000

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5T	CO2e
Total	—	—	—	—	—	—	—	—	11.5694

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	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—
Elementary School	—	—	—	—	—	—	—	—	0.11012
Total	—	—	—	—	—	—	—	—	0.11012
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—
Elementary School	—	—	—	—	—	—	—	—	0.11012
Total	—	—	—	—	—	—	—	—	0.11012
Annual	—	—	—	—	—	—	—	—	—
Elementary School	—	—	—	—	—	—	—	—	0.01823
Total	—	—	—	—	—	—	—	—	0.01823

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	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5T	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	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5T	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	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—

Vegetation	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5T	CO2e
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	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5T	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	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—

Species	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5T	CO2e
Removed	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—

5. Activity Data

5.1. Construction Schedule

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase	Phase Description
Demolition	Demolition	6/1/2028	7/12/2028	5.00000	30.0000	—
Site Preparation	Site Preparation	7/13/2028	8/2/2028	5.00000	15.0000	—
Grading	Grading	8/1/2028	8/9/2028	5.00000	7.00000	—
Building Construction	Building Construction	8/10/2028	6/30/2029	5.00000	232.000	—
Paving	Paving	7/1/2029	7/16/2029	5.00000	11.0000	—
Architectural Coating	Architectural Coating	7/17/2029	8/1/2029	5.00000	12.0000	—

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
Site Preparation	Graders	Diesel	Average	1.000000	8.00000	148.000	0.41000
Site Preparation	Scrapers	Diesel	Average	1.000000	8.00000	423.000	0.48000
Site Preparation	Tractors/Loaders/ Backhoes	Diesel	Average	1.000000	7.00000	84.0000	0.37000
Grading	Graders	Diesel	Average	1.000000	8.00000	148.000	0.41000
Grading	Rubber Tired Dozers	Diesel	Average	1.000000	8.00000	367.000	0.40000

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Grading	Tractors/Loaders/ Backhoes	Diesel	Average	2.00000	7.00000	84.0000	0.37000
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
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	12.5000	7.70000	LDA,LDT1,LDT2
Demolition	Vendor	—	4.00000	HHDT,MHDT

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Demolition	Hauling	4.00000	20.0000	HHDT
Demolition	Onsite truck	—	—	HHDT
Site Preparation	Worker	7.50000	7.70000	LDA,LDT1,LDT2
Site Preparation	Vendor	—	4.00000	HHDT,MHDT
Site Preparation	Hauling	0.00000	20.0000	HHDT
Site Preparation	Onsite truck	—	—	HHDT
Grading	Worker	10.00000	7.70000	LDA,LDT1,LDT2
Grading	Vendor	—	4.00000	HHDT,MHDT
Grading	Hauling	35.7143	20.0000	HHDT
Grading	Onsite truck	—	—	HHDT
Building Construction	Worker	11.9734	7.70000	LDA,LDT1,LDT2
Building Construction	Vendor	4.67246	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	2.39467	7.70000	LDA,LDT1,LDT2
Architectural Coating	Vendor	—	4.00000	HHDT,MHDT
Architectural Coating	Hauling	0.00000	20.0000	HHDT

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Architectural Coating	Onsite truck	—	—	HHDT

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

Non-applicable. No control strategies activated by user.

5.5. Architectural Coatings

Phase Name	Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
Architectural Coating	0.00000	0.00000	42,762.0	14,254.0	5,802.36

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	10,352.0	0.00000
Site Preparation	0.00000	0.00000	3.51000	0.00000	0.00000
Grading	2,000.00	0.00000	3.51000	0.00000	0.00000
Paving	0.00000	0.00000	0.00000	0.00000	2.22006

5.6.2. Construction Earthmoving Control Strategies

Non-applicable. No control strategies activated by user.

5.7. Construction Paving

Phase Name	Land Use	Area Paved (acres)	% Asphalt
Paving	Elementary School	0.00000	0%
Paving	Parking Lot	1.39704	100%
Paving	Other Non-Asphalt Surfaces	0.82303	0%

5.8. Construction Electricity Consumption and Emissions Factors

kWh per Year and Emission Factor (lb/MWh)

Year	kWh per Year	CO2	CH4	N2O
2028	0.00000	203.983	0.03300	0.00400
2029	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
Elementary School	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Parking Lot	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Other Non-Asphalt Surfaces	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

5.10. Operational Area Sources

5.10.1. Hearths

Land Use	Hearth Type	Unmitigated (number)	Mitigated (number)
Elementary School	Wood Fireplaces	0	0
Elementary School	Gas Fireplaces	0	0
Elementary School	Propane Fireplaces	0	0
Elementary School	Electric Fireplaces	0	0
Elementary School	No Fireplaces	0	0
Elementary School	Conventional Wood Stoves	0	0
Elementary School	Catalytic Wood Stoves	0	0
Elementary School	Non-Catalytic Wood Stoves	0	0
Elementary School	Pellet Wood Stoves	0	0
Parking Lot	Wood Fireplaces	0	0
Parking Lot	Gas Fireplaces	0	0
Parking Lot	Propane Fireplaces	0	0
Parking Lot	Electric Fireplaces	0	0
Parking Lot	No Fireplaces	0	0
Parking Lot	Conventional Wood Stoves	0	0
Parking Lot	Catalytic Wood Stoves	0	0
Parking Lot	Non-Catalytic Wood Stoves	0	0
Parking Lot	Pellet Wood Stoves	0	0
Other Non-Asphalt Surfaces	Wood Fireplaces	0	0

Land Use	Hearth Type	Unmitigated (number)	Mitigated (number)
Other Non-Asphalt Surfaces	Gas Fireplaces	0	0
Other Non-Asphalt Surfaces	Propane Fireplaces	0	0
Other Non-Asphalt Surfaces	Electric Fireplaces	0	0
Other Non-Asphalt Surfaces	No Fireplaces	0	0
Other Non-Asphalt Surfaces	Conventional Wood Stoves	0	0
Other Non-Asphalt Surfaces	Catalytic Wood Stoves	0	0
Other Non-Asphalt Surfaces	Non-Catalytic Wood Stoves	0	0
Other Non-Asphalt Surfaces	Pellet Wood Stoves	0	0

5.10.2. Architectural Coatings

Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
0.00000	0.00000	42,762.0	14,254.0	5,802.36

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)
Elementary School	136,660	203.983	0.0330	0.0040	1,287,029
Parking Lot	53,309.0	203.983	0.0330	0.0040	0.00000
Other Non-Asphalt Surfaces	0.00000	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)
Elementary School	826,644	0.00000
Parking Lot	0.00000	0.00000
Other Non-Asphalt Surfaces	0.00000	849,989

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Elementary School	37.0604	0.00000
Parking Lot	0.00000	0.00000
Other Non-Asphalt Surfaces	0.00000	0.00000

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

Land Use	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
Elementary School	Household refrigerators and/or freezers	R-134a	1,430.00	0.01679	0.60000	0.00000	1.000000
Elementary School	Other commercial A/C and heat pumps	R-410A	2,088.00	0.00180	4.00000	4.00000	18.0000
Elementary School	Stand-alone retail refrigerators and freezers	R-134a	1,430.00	0.00004	1.000000	0.00000	1.000000
Elementary School	Walk-in refrigerators and freezers	R-404A	3,922.00	0.00040	7.50000	7.50000	20.0000

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

5.16.2. Process Boilers

5.17. User Defined

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres

5.18.2. Sequestration

5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

Cal-Adapt midcentury 2040–2059 average projections for four hazards are reported below for your project location. These are under Representation Concentration Pathway (RCP) 8.5 which assumes GHG emissions will continue to rise strongly through 2050 and then plateau around 2100.

Climate Hazard	Result for Project Location	Unit
Temperature and Extreme Heat	29.7100	annual days of extreme heat
Extreme Precipitation	1.45000	annual days with precipitation above 20 mm

Climate Hazard	Result for Project Location	Unit
Sea Level Rise	—	meters of inundation depth
Wildfire	0.00000	annual hectares burned

Temperature and Extreme Heat data are for grid cell in which your project are located. The projection is based on the 98th historical percentile of daily maximum/minimum temperatures from observed historical data (32 climate model ensemble from Cal-Adapt, 2040–2059 average under RCP 8.5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

Extreme Precipitation data are for the grid cell in which your project are located. The threshold of 20 mm is equivalent to about ¾ an inch of rain, which would be light to moderate rainfall if received over a full day or heavy rain if received over a period of 2 to 4 hours. Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

Sea Level Rise data are for the grid cell in which your project are located. The projections are from Radke et al. (2017), as reported in Cal-Adapt (Radke et al., 2017, CEC-500-2017-008), and consider inundation location and depth for the San Francisco Bay, the Sacramento-San Joaquin River Delta and California coast resulting different increments of sea level rise coupled with extreme storm events. Users may select from four scenarios to view the range in potential inundation depth for the grid cell. The four scenarios are: No rise, 0.5 meter, 1.0 meter, 1.41 meters

Wildfire data are for the grid cell in which your project are located. The projections are from UC Davis, as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider historical data of climate, vegetation, population density, and large (> 400 ha) fire history. Users may select from four model simulations to view the range in potential wildfire probabilities for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

6.2. Initial Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	3	0	0	N/A
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	N/A	N/A	N/A	N/A
Wildfire	N/A	N/A	N/A	N/A
Flooding	0	0	0	N/A
Drought	0	0	0	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	0	0	0	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.

The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.

The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores do not include implementation of climate risk reduction measures.

6.3. Adjusted Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	3	1	1	3
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	N/A	N/A	N/A	N/A
Wildfire	N/A	N/A	N/A	N/A
Flooding	1	1	1	2
Drought	1	1	1	2
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	1	1	1	2

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.

The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.

The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores include implementation of climate risk reduction measures.

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Exposure Indicators	—
AQ-Ozone	84.5800
AQ-PM	97.0006
AQ-DPM	52.7194
Drinking Water	84.3887
Lead Risk Housing	78.7146
Pesticides	0.00000
Toxic Releases	73.5809
Traffic	75.4125
Effect Indicators	—
CleanUp Sites	0.00000
Groundwater	25.0872
Haz Waste Facilities/Generators	7.65056
Impaired Water Bodies	0.00000
Solid Waste	0.00000
Sensitive Population	—
Asthma	94.3918
Cardio-vascular	58.0758
Low Birth Weights	96.0354
Socioeconomic Factor Indicators	—

Indicator	Result for Project Census Tract
Education	84.1812
Housing	99.4043
Linguistic	76.3297
Poverty	95.0000
Unemployment	98.7897

7.2. Healthy Places Index Scores

The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Economic	—
Above Poverty	11.36917747
Employed	3.233671243
Median HI	15.10329783
Education	—
Bachelor's or higher	13.64044655
High school enrollment	17.87501604
Preschool enrollment	26.94726036
Transportation	—
Auto Access	9.572693443
Active commuting	71.23059156
Social	—

Indicator	Result for Project Census Tract
2-parent households	1.398691133
Voting	7.981521879
Neighborhood	—
Alcohol availability	22.64853073
Park access	23.7520852
Retail density	54.01000898
Supermarket access	31.695111
Tree canopy	41.01116387
Housing	—
Homeownership	21.14718337
Housing habitability	27.12690876
Low-inc homeowner severe housing cost burden	49.14667009
Low-inc renter severe housing cost burden	12.60105223
Uncrowded housing	31.19466188
Health Outcomes	—
Insured adults	25.13794431
Arthritis	47.0
Asthma ER Admissions	9.0
High Blood Pressure	39.5
Cancer (excluding skin)	74.5
Asthma	10.9

Indicator	Result for Project Census Tract
Coronary Heart Disease	37.1
Chronic Obstructive Pulmonary Disease	16.6
Diagnosed Diabetes	33.2
Life Expectancy at Birth	18.9
Cognitively Disabled	6.1
Physically Disabled	16.6
Heart Attack ER Admissions	37.0
Mental Health Not Good	12.8
Chronic Kidney Disease	45.1
Obesity	24.6
Pedestrian Injuries	44.8
Physical Health Not Good	21.1
Stroke	22.5
Health Risk Behaviors	—
Binge Drinking	71.2
Current Smoker	19.3
No Leisure Time for Physical Activity	12.0
Climate Change Exposures	—
Wildfire Risk	0.0
SLR Inundation Area	0.0
Children	22.0

Indicator	Result for Project Census Tract
Elderly	80.7
English Speaking	46.9
Foreign-born	32.9
Outdoor Workers	6.7
Climate Change Adaptive Capacity	—
Impervious Surface Cover	32.8
Traffic Density	48.5
Traffic Access	0.0
Other Indices	—
Hardship	88.8
Other Decision Support	—
2016 Voting	4.7

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	90.0000
Healthy Places Index Score for Project Location (b)	2.00000
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	Yes
Project Located in a Low-Income Community (Assembly Bill 1550)	Yes
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	No

a: The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

b: The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

7.4. Health & Equity Measures

No Health & Equity Measures selected.

7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

7.6. Health & Equity Custom Measures

No Health & Equity Custom Measures created.

8. User Changes to Default Data

8.1. Justifications

Screen	Justification
Construction: Construction Phases	Adjusted schedule to match FUSD's Construction Manager's schedule.
Construction: Dust From Material Movement	Input gross phase size for site preparation and grading.
Operations: Vehicle Data	Set weekday trip rate to zero since the Phase (and total project) would not add student capacity or increase student enrollment

8.4. Construction

8.4.1. Construction Phases

Phase Type	Phase Name	Model Parameter	Default Value	New Value
Demolition	Demolition	End Date	6/29/2028	7/12/2028
Demolition	Demolition	Work Days per Phase	20.0000	30.0000
Site Preparation	Site Preparation	Start Date	6/30/2028	7/13/2028
Site Preparation	Site Preparation	End Date	7/4/2028	8/2/2028
Site Preparation	Site Preparation	Work Days per Phase	3.00000	15.0000
Grading	Grading	Start Date	7/5/2028	8/1/2028
Grading	Grading	End Date	7/13/2028	8/9/2028
Grading	Grading	Work Days per Phase	6.00000	7.00000
Building Construction	Building Construction	Start Date	7/14/2028	8/10/2028
Building Construction	Building Construction	End Date	5/18/2029	6/30/2029
Building Construction	Building Construction	Work Days per Phase	220.000	232.000
Paving	Paving	Start Date	5/19/2029	7/1/2029
Paving	Paving	End Date	6/2/2029	7/16/2029
Paving	Paving	Work Days per Phase	10.00000	11.0000
Architectural Coating	Architectural Coating	Start Date	6/3/2029	7/17/2029
Architectural Coating	Architectural Coating	End Date	6/17/2029	8/1/2029
Architectural Coating	Architectural Coating	Work Days per Phase	10.00000	12.0000

8.4.4. Dust from Material Movement

Phase Name	Model Parameter	Units	Default Value	New Value
Site Preparation	Material Imported	Cubic Yards	—	0.00000

Phase Name	Model Parameter	Units	Default Value	New Value
Site Preparation	Material Exported	Cubic Yards	—	0.00000
Site Preparation	Total Acres Graded	acres	22.5000	3.51000
Grading	Material Imported	Cubic Yards	—	2,000.00
Grading	Material Exported	Cubic Yards	—	0.00000
Grading	Total Acres Graded	acres	7.00000	3.51000

8.5. Operations

8.5.1. Mobile Sources

8.5.1.1. Vehicle Data

Land Use	Model Parameter	Units	Default Value	New Value
Elementary School	Weekday Trip Rate	size/day	19.5200	0.00000
Elementary School	Weekday Primary Trip	%	100.0000	0.00000
Elementary School	Saturday Primary Trip	%	100.0000	0.00000
Elementary School	Sunday Primary Trip	%	100.0000	0.00000
Parking Lot	Weekday Primary Trip	%	100.0000	0.00000
Parking Lot	Saturday Primary Trip	%	100.0000	0.00000
Parking Lot	Sunday Primary Trip	%	100.0000	0.00000
Other Non-Asphalt Surfaces	Weekday Primary Trip	%	100.0000	0.00000
Other Non-Asphalt Surfaces	Saturday Primary Trip	%	100.0000	0.00000
Other Non-Asphalt Surfaces	Sunday Primary Trip	%	100.0000	0.00000

Appendix A.2: Phase 2 CalEEMod Emission Modeling

Norseman ES Modernization - Phase 2 - 07/01/2026 Detailed Report

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1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	Norseman ES Modernization - Phase 2 - 07/01/2026
Construction Start Date	6/1/2029
Operational Year	2029
Lead Agency	—
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	2.70000
Precipitation (days)	25.4000
Location	36.767863820352204, -119.74380520229535
County	Fresno
City	Fresno
Air District	San Joaquin Valley APCD
Air Basin	San Joaquin Valley
TAZ	2464
EDFZ	5
Electric Utility	Pacific Gas & Electric Company
Gas Utility	Pacific Gas & Electric

Data Field	Value
App Version	2022.1.1.45

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
Parking Lot	83.6990	1000sqft	1.92146	0.00000	0.00000	0.00000	—	—
Other Non-Asphalt Surfaces	10.7330	1000sqft	0.24640	0.00000	13,909.0	13,909.0	—	—

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.	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—
Unmit.	4.48054	14.1857	14.9896	0.04195	0.53817	7.74863	8.28680	4.13199	5,294.69
Average Daily (Max)	—	—	—	—	—	—	—	—	—
Unmit.	0.19613	1.01168	1.22285	0.00265	0.03662	0.20929	0.24591	0.10704	309.155

Un/Mit.	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5T	CO2e
Annual (Max)	—	—	—	—	—	—	—	—	—
Unmit.	0.03579	0.18463	0.22317	0.00048	0.00668	0.03820	0.04488	0.01954	51.1842
Exceeds (Daily Max)	—	—	—	—	—	—	—	—	—
Threshold	100.0000	100.0000	100.0000	100.0000	—	—	100.0000	100.0000	—
Unmit.	No	No	No	No	—	—	No	No	—
Exceeds (Average Daily)	—	—	—	—	—	—	—	—	—
Threshold	100.0000	100.0000	100.0000	100.0000	—	—	100.0000	100.0000	—
Unmit.	No	No	No	No	—	—	No	No	—
Exceeds (Annual)	—	—	—	—	—	—	—	—	—
Threshold	10.00000	10.00000	100.0000	27.0000	—	—	15.0000	15.0000	—
Unmit.	No	No	No	No	Yes	Yes	No	No	—

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	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5T	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—
2029	4.48054	14.1857	14.9896	0.04195	0.53817	7.74863	8.28680	4.13199	5,294.69

Year	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5T	CO2e
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—
2029	0.19613	1.01168	1.22285	0.00265	0.03662	0.20929	0.24591	0.10704	309.155
Annual	—	—	—	—	—	—	—	—	—
2029	0.03579	0.18463	0.22317	0.00048	0.00668	0.03820	0.04488	0.01954	51.1842

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	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5T	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—
2029	4.48054	11.6034	14.3673	0.02507	0.48306	6.92172	7.40478	3.85263	2,724.14
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—
2029	0.19155	0.90964	1.17401	0.00206	0.03493	0.18009	0.21502	0.09757	218.245
Annual	—	—	—	—	—	—	—	—	—
2029	0.03496	0.16601	0.21426	0.00038	0.00637	0.03287	0.03924	0.01781	36.1329

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	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5T	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—
2029	0.08356	3.12755	1.07405	0.01929	0.05512	0.82690	0.88202	0.27936	2,831.72
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—
2029	0.00458	0.10204	0.04884	0.00059	0.00170	0.02919	0.03089	0.00947	90.9108
Annual	—	—	—	—	—	—	—	—	—
2029	0.00084	0.01862	0.00891	0.00011	0.00031	0.00533	0.00564	0.00173	15.0513

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.	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—
Unmit.	0.01462	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	41.9602
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—
Unmit.	0.01462	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	41.9602
Average Daily (Max)	—	—	—	—	—	—	—	—	—
Unmit.	0.01462	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	41.9602
Annual (Max)	—	—	—	—	—	—	—	—	—
Unmit.	0.00267	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	6.94699

Un/Mit.	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5T	CO2e
Exceeds (Daily Max)	—	—	—	—	—	—	—	—	—
Threshold	100.0000	100.0000	100.0000	98.0000	—	—	100.0000	100.0000	—
Unmit.	No	No	No	No	—	—	No	No	—
Exceeds (Average Daily)	—	—	—	—	—	—	—	—	—
Threshold	100.0000	100.0000	100.0000	98.0000	—	—	100.0000	100.0000	—
Unmit.	No	No	No	No	—	—	No	No	—
Exceeds (Annual)	—	—	—	—	—	—	—	—	—
Threshold	10.00000	10.00000	100.0000	27.0000	—	—	15.0000	15.0000	—
Unmit.	No	No	No	No	No	No	No	No	—

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	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—
Mobile	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Area	0.01462	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000
Energy	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	41.3808
Water	—	—	—	—	—	—	—	—	0.57944
Waste	—	—	—	—	—	—	—	—	0.00000
Total	0.01462	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	41.9602

Sector	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5T	CO2e
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—
Mobile	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Area	0.01462	—	—	—	—	—	—	—	—
Energy	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	41.3808
Water	—	—	—	—	—	—	—	—	0.57944
Waste	—	—	—	—	—	—	—	—	0.00000
Total	0.01462	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	41.9602
Average Daily	—	—	—	—	—	—	—	—	—
Mobile	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Area	0.01462	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000
Energy	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	41.3808
Water	—	—	—	—	—	—	—	—	0.57944
Waste	—	—	—	—	—	—	—	—	0.00000
Total	0.01462	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	41.9602
Annual	—	—	—	—	—	—	—	—	—
Mobile	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Area	0.00267	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000
Energy	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	6.85106
Water	—	—	—	—	—	—	—	—	0.09593
Waste	—	—	—	—	—	—	—	—	0.00000
Total	0.00267	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	6.94699

3. Construction Emissions Details

3.1. Demolition (2029)

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	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.29640	11.6034	14.3673	0.02392	0.42313	—	0.42313	0.38928	2,501.51
Demolition	—	—	—	—	—	1.26151	1.26151	0.19103	—
Onsite truck	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	0.05328	0.47685	0.59044	0.00098	0.01739	—	0.01739	0.01600	102.802
Demolition	—	—	—	—	—	0.05184	0.05184	0.00785	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.00972	0.08703	0.10775	0.00018	0.00317	—	0.00317	0.00292	17.0200
Demolition	—	—	—	—	—	0.00946	0.00946	0.00143	—
Onsite truck	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	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—
Worker	0.04015	0.01805	0.34359	0.00000	0.00000	0.06800	0.06800	0.01594	71.0461
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.01794	1.08585	0.27875	0.00673	0.01922	0.26945	0.28867	0.09299	967.880
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—
Worker	0.00147	0.00085	0.01156	0.00000	0.00000	0.00275	0.00275	0.00064	2.68581
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00071	0.04670	0.01155	0.00028	0.00079	0.01094	0.01173	0.00379	39.7451
Annual	—	—	—	—	—	—	—	—	—
Worker	0.00027	0.00016	0.00211	0.00000	0.00000	0.00050	0.00050	0.00012	0.44467
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00013	0.00852	0.00211	0.00005	0.00014	0.00200	0.00214	0.00069	6.58025

3.2. Site Preparation (2029)

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	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.00807	7.76298	10.6075	0.02507	0.32694	—	0.32694	0.30079	2,724.14
Dust From Material Movement	—	—	—	—	—	0.75447	0.75447	0.08147	—
Onsite truck	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	0.01933	0.14888	0.20343	0.00048	0.00627	—	0.00627	0.00577	52.2439
Dust From Material Movement	—	—	—	—	—	0.01447	0.01447	0.00156	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.00353	0.02717	0.03713	0.00009	0.00114	—	0.00114	0.00105	8.64957
Dust From Material Movement	—	—	—	—	—	0.00264	0.00264	0.00029	—
Onsite truck	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	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—
Worker	0.02409	0.01083	0.20615	0.00000	0.00000	0.04080	0.04080	0.00956	42.6277
Vendor	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
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—
Worker	0.00041	0.00024	0.00324	0.00000	0.00000	0.00077	0.00077	0.00018	0.75203
Vendor	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
Annual	—	—	—	—	—	—	—	—	—
Worker	0.00008	0.00004	0.00059	0.00000	0.00000	0.00014	0.00014	0.00003	0.12451
Vendor	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

3.3. Grading (2029)

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	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5T	CO2e
Off-Road Equipment	1.31348	11.0582	13.8256	0.02266	0.48306	—	0.48306	0.44441	2,462.97
Dust From Material Movement	—	—	—	—	—	6.92172	6.92172	3.40821	—
Onsite truck	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	0.02159	0.18178	0.22727	0.00037	0.00794	—	0.00794	0.00731	40.4872
Dust From Material Movement	—	—	—	—	—	0.11378	0.11378	0.05603	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.00394	0.03317	0.04148	0.00007	0.00145	—	0.00145	0.00133	6.70312
Dust From Material Movement	—	—	—	—	—	0.02077	0.02077	0.01022	—
Onsite truck	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	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—
Worker	0.03212	0.01444	0.27487	0.00000	0.00000	0.05440	0.05440	0.01275	56.8369
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.05144	3.11311	0.79918	0.01929	0.05512	0.77250	0.82762	0.26661	2,774.88
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—
Worker	0.00047	0.00027	0.00370	0.00000	0.00000	0.00088	0.00088	0.00021	0.85946
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00082	0.05356	0.01324	0.00032	0.00091	0.01254	0.01345	0.00434	45.5792
Annual	—	—	—	—	—	—	—	—	—
Worker	0.00009	0.00005	0.00068	0.00000	0.00000	0.00016	0.00016	0.00004	0.14229
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00015	0.00977	0.00242	0.00006	0.00017	0.00229	0.00245	0.00079	7.54616

3.4. Paving (2029)

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	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5T	CO2e
Off-Road Equipment	0.60245	5.41905	8.18783	0.01181	0.18968	—	0.18968	0.17450	1,247.67
Paving	0.83904	—	—	—	—	—	—	—	—
Onsite truck	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	0.00990	0.08908	0.13459	0.00019	0.00312	—	0.00312	0.00287	20.5097
Paving	0.01379	—	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.00181	0.01626	0.02456	0.00004	0.00057	—	0.00057	0.00052	3.39561
Paving	0.00252	—	—	—	—	—	—	—	—
Onsite truck	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	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—
Worker	0.04818	0.02166	0.41231	0.00000	0.00000	0.08161	0.08161	0.01913	85.2554
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5T	CO2e
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—
Worker	0.00071	0.00041	0.00555	0.00000	0.00000	0.00132	0.00132	0.00031	1.28919
Vendor	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
Annual	—	—	—	—	—	—	—	—	—
Worker	0.00013	0.00007	0.00101	0.00000	0.00000	0.00024	0.00024	0.00006	0.21344
Vendor	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

3.5. Architectural Coating (2029)

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	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.10236	0.79416	1.11216	0.00173	0.01284	—	0.01284	0.01181	133.968
Architectural Coatings	4.37818	—	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5T	CO2e
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.00168	0.01305	0.01828	0.00003	0.00021	—	0.00021	0.00019	2.20221
Architectural Coatings	0.07197	—	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.00031	0.00238	0.00334	0.00001	0.00004	—	0.00004	0.00004	0.36460
Architectural Coatings	0.01313	—	—	—	—	—	—	—	—
Onsite truck	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	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—
Worker	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5T	CO2e
Average Daily	—	—	—	—	—	—	—	—	—
Worker	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—
Worker	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Vendor	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

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	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—
Parking Lot	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Other Non-Asphalt Surfaces	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

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5T	CO2e
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—
Parking Lot	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Other Non-Asphalt Surfaces	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
Annual	—	—	—	—	—	—	—	—	—
Parking Lot	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Other Non-Asphalt Surfaces	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

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	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—
Parking Lot	—	—	—	—	—	—	—	—	41.3808
Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	0.00000
Total	—	—	—	—	—	—	—	—	41.3808
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5T	CO2e
Parking Lot	—	—	—	—	—	—	—	—	41.3808
Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	0.00000
Total	—	—	—	—	—	—	—	—	41.3808
Annual	—	—	—	—	—	—	—	—	—
Parking Lot	—	—	—	—	—	—	—	—	6.85106
Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	0.00000
Total	—	—	—	—	—	—	—	—	6.85106

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	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—
Parking Lot	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000
Other Non-Asphalt Surfaces	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
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—
Parking Lot	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000
Other Non-Asphalt Surfaces	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

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5T	CO2e
Annual	—	—	—	—	—	—	—	—	—
Parking Lot	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000
Other Non-Asphalt Surfaces	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

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	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—
Consumer Products	0.00743	—	—	—	—	—	—	—	—
Architectural Coatings	0.00720	—	—	—	—	—	—	—	—
Landscape Equipment	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000
Total	0.01462	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—
Consumer Products	0.00743	—	—	—	—	—	—	—	—
Architectural Coatings	0.00720	—	—	—	—	—	—	—	—

Source	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5T	CO2e
Total	0.01462	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—
Consumer Products	0.00136	—	—	—	—	—	—	—	—
Architectural Coatings	0.00131	—	—	—	—	—	—	—	—
Landscape Equipment	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000
Total	0.00267	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—
Parking Lot	—	—	—	—	—	—	—	—	0.00000
Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	0.57944
Total	—	—	—	—	—	—	—	—	0.57944
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—
Parking Lot	—	—	—	—	—	—	—	—	0.00000

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5T	CO2e
Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	0.57944
Total	—	—	—	—	—	—	—	—	0.57944
Annual	—	—	—	—	—	—	—	—	—
Parking Lot	—	—	—	—	—	—	—	—	0.00000
Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	0.09593
Total	—	—	—	—	—	—	—	—	0.09593

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	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—
Parking Lot	—	—	—	—	—	—	—	—	0.00000
Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	0.00000
Total	—	—	—	—	—	—	—	—	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—
Parking Lot	—	—	—	—	—	—	—	—	0.00000
Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	0.00000

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5T	CO2e
Total	—	—	—	—	—	—	—	—	0.00000
Annual	—	—	—	—	—	—	—	—	—
Parking Lot	—	—	—	—	—	—	—	—	0.00000
Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	0.00000
Total	—	—	—	—	—	—	—	—	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	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5T	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	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5T	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	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5T	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	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—

Vegetation	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5T	CO2e
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	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5T	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	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—

Species	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5T	CO2e
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	7/2/2029	7/20/2029	5.00000	15.0000	—
Site Preparation	Site Preparation	7/21/2029	7/31/2029	5.00000	7.00000	—
Grading	Grading	8/1/2029	8/8/2029	5.00000	6.00000	—
Paving	Paving	8/9/2029	8/16/2029	5.00000	6.00000	—
Architectural Coating	Architectural Coating	8/17/2029	8/24/2029	5.00000	6.00000	—

5.2. Off-Road Equipment

5.2.1. Unmitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Demolition	Concrete/Industrial Saws	Diesel	Average	1.000000	8.00000	33.0000	0.73000
Demolition	Rubber Tired Dozers	Diesel	Average	1.000000	8.00000	367.000	0.40000
Demolition	Tractors/Loaders/ Backhoes	Diesel	Average	3.00000	8.00000	84.0000	0.37000
Site Preparation	Graders	Diesel	Average	1.000000	8.00000	148.000	0.41000
Site Preparation	Tractors/Loaders/ Backhoes	Diesel	Average	1.000000	7.00000	84.0000	0.37000
Site Preparation	Scrapers	Diesel	Average	1.000000	8.00000	423.000	0.48000
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

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Grading	Tractors/Loaders/ Backhoes	Diesel	Average	2.00000	7.00000	84.0000	0.37000
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	12.5000	7.70000	LDA,LDT1,LDT2
Demolition	Vendor	—	4.00000	HHDT,MHDT
Demolition	Hauling	14.5333	20.0000	HHDT
Demolition	Onsite truck	—	—	HHDT
Site Preparation	Worker	7.50000	7.70000	LDA,LDT1,LDT2
Site Preparation	Vendor	—	4.00000	HHDT,MHDT
Site Preparation	Hauling	0.00000	20.0000	HHDT
Site Preparation	Onsite truck	—	—	HHDT

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Grading	Worker	10.00000	7.70000	LDA,LDT1,LDT2
Grading	Vendor	—	4.00000	HHDT,MHDT
Grading	Hauling	41.6667	20.0000	HHDT
Grading	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	0.00000	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

Non-applicable. No control strategies activated by user.

5.5. Architectural Coatings

Phase Name	Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
Architectural Coating	0.00000	0.00000	0.00000	0.00000	5,665.92

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (cy)	Material Exported (cy)	Acres Graded (acres)	Material Demolished (Building Square Footage)	Acres Paved (acres)
Demolition	0.00000	0.00000	0.00000	18,929.0	0.00000
Site Preparation	—	—	2.49000	0.00000	0.00000
Grading	2,000.00	—	2.49000	0.00000	0.00000
Paving	0.00000	0.00000	0.00000	0.00000	2.16786

5.6.2. Construction Earthmoving Control Strategies

Non-applicable. No control strategies activated by user.

5.7. Construction Paving

Phase Name	Land Use	Area Paved (acres)	% Asphalt
Paving	Parking Lot	1.92146	100%
Paving	Other Non-Asphalt Surfaces	0.24640	0%

5.8. Construction Electricity Consumption and Emissions Factors

kWh per Year and Emission Factor (lb/MWh)

Year	kWh per Year	CO2	CH4	N2O
2029	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
Parking Lot	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Other Non-Asphalt Surfaces	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

5.10. Operational Area Sources

5.10.1. Hearths

Land Use	Hearth Type	Unmitigated (number)	Mitigated (number)
Parking Lot	Wood Fireplaces	0	0
Parking Lot	Gas Fireplaces	0	0
Parking Lot	Propane Fireplaces	0	0
Parking Lot	Electric Fireplaces	0	0
Parking Lot	No Fireplaces	0	0
Parking Lot	Conventional Wood Stoves	0	0
Parking Lot	Catalytic Wood Stoves	0	0
Parking Lot	Non-Catalytic Wood Stoves	0	0
Parking Lot	Pellet Wood Stoves	0	0
Other Non-Asphalt Surfaces	Wood Fireplaces	0	0
Other Non-Asphalt Surfaces	Gas Fireplaces	0	0
Other Non-Asphalt Surfaces	Propane Fireplaces	0	0
Other Non-Asphalt Surfaces	Electric Fireplaces	0	0

Land Use	Hearth Type	Unmitigated (number)	Mitigated (number)
Other Non-Asphalt Surfaces	No Fireplaces	0	0
Other Non-Asphalt Surfaces	Conventional Wood Stoves	0	0
Other Non-Asphalt Surfaces	Catalytic Wood Stoves	0	0
Other Non-Asphalt Surfaces	Non-Catalytic Wood Stoves	0	0
Other Non-Asphalt Surfaces	Pellet Wood Stoves	0	0

5.10.2. Architectural Coatings

Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
0.00000	0.00000	0.00000	0.00000	5,665.92

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)
Parking Lot	73,320.3	203.983	0.0330	0.0040	0.00000

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Other Non-Asphalt Surfaces	0.00000	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)
Parking Lot	0.00000	0.00000
Other Non-Asphalt Surfaces	0.00000	424,293

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Parking Lot	0.00000	0.00000
Other Non-Asphalt Surfaces	0.00000	0.00000

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

5.16.2. Process Boilers

5.17. User Defined

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres

5.18.2. Sequestration

5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

Cal-Adapt midcentury 2040–2059 average projections for four hazards are reported below for your project location. These are under Representation Concentration Pathway (RCP) 8.5 which assumes GHG emissions will continue to rise strongly through 2050 and then plateau around 2100.

Climate Hazard	Result for Project Location	Unit
Temperature and Extreme Heat	29.7100	annual days of extreme heat
Extreme Precipitation	1.45000	annual days with precipitation above 20 mm
Sea Level Rise	—	meters of inundation depth
Wildfire	0.00000	annual hectares burned

Temperature and Extreme Heat data are for grid cell in which your project are located. The projection is based on the 98th historical percentile of daily maximum/minimum temperatures from observed historical data (32 climate model ensemble from Cal-Adapt, 2040–2059 average under RCP 8.5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

Extreme Precipitation data are for the grid cell in which your project are located. The threshold of 20 mm is equivalent to about ¾ an inch of rain, which would be light to moderate rainfall if received over a full day or heavy rain if received over a period of 2 to 4 hours. Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

Sea Level Rise data are for the grid cell in which your project are located. The projections are from Radke et al. (2017), as reported in Cal-Adapt (Radke et al., 2017, CEC-500-2017-008), and consider inundation location and depth for the San Francisco Bay, the Sacramento-San Joaquin River Delta and California coast resulting different increments of sea level rise coupled with extreme storm events. Users may select from four scenarios to view the range in potential inundation depth for the grid cell. The four scenarios are: No rise, 0.5 meter, 1.0 meter, 1.41 meters

Wildfire data are for the grid cell in which your project are located. The projections are from UC Davis, as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider historical data of climate, vegetation, population density, and large (> 400 ha) fire history. Users may select from four model simulations to view the range in potential wildfire probabilities for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

6.2. Initial Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	3	0	0	N/A
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	N/A	N/A	N/A	N/A
Wildfire	N/A	N/A	N/A	N/A
Flooding	0	0	0	N/A
Drought	0	0	0	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	0	0	0	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.

The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.

The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores do not include implementation of climate risk reduction measures.

6.3. Adjusted Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	3	1	1	3
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	N/A	N/A	N/A	N/A
Wildfire	N/A	N/A	N/A	N/A
Flooding	1	1	1	2
Drought	1	1	1	2

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	1	1	1	2

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.

The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.

The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores include implementation of climate risk reduction measures.

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Exposure Indicators	—
AQ-Ozone	84.5800
AQ-PM	97.0006
AQ-DPM	52.7194
Drinking Water	84.3887
Lead Risk Housing	78.7146
Pesticides	0.00000

Indicator	Result for Project Census Tract
Toxic Releases	73.5809
Traffic	75.4125
Effect Indicators	—
CleanUp Sites	0.00000
Groundwater	25.0872
Haz Waste Facilities/Generators	7.65056
Impaired Water Bodies	0.00000
Solid Waste	0.00000
Sensitive Population	—
Asthma	94.3918
Cardio-vascular	58.0758
Low Birth Weights	96.0354
Socioeconomic Factor Indicators	—
Education	84.1812
Housing	99.4043
Linguistic	76.3297
Poverty	95.0000
Unemployment	98.7897

7.2. Healthy Places Index Scores

The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Economic	—
Above Poverty	11.36917747
Employed	3.233671243
Median HI	15.10329783
Education	—
Bachelor's or higher	13.64044655
High school enrollment	17.87501604
Preschool enrollment	26.94726036
Transportation	—
Auto Access	9.572693443
Active commuting	71.23059156
Social	—
2-parent households	1.398691133
Voting	7.981521879
Neighborhood	—
Alcohol availability	22.64853073
Park access	23.7520852
Retail density	54.01000898
Supermarket access	31.695111
Tree canopy	41.01116387
Housing	—

Indicator	Result for Project Census Tract
Homeownership	21.14718337
Housing habitability	27.12690876
Low-inc homeowner severe housing cost burden	49.14667009
Low-inc renter severe housing cost burden	12.60105223
Uncrowded housing	31.19466188
Health Outcomes	—
Insured adults	25.13794431
Arthritis	47.0
Asthma ER Admissions	9.0
High Blood Pressure	39.5
Cancer (excluding skin)	74.5
Asthma	10.9
Coronary Heart Disease	37.1
Chronic Obstructive Pulmonary Disease	16.6
Diagnosed Diabetes	33.2
Life Expectancy at Birth	18.9
Cognitively Disabled	6.1
Physically Disabled	16.6
Heart Attack ER Admissions	37.0
Mental Health Not Good	12.8
Chronic Kidney Disease	45.1

Indicator	Result for Project Census Tract
Obesity	24.6
Pedestrian Injuries	44.8
Physical Health Not Good	21.1
Stroke	22.5
Health Risk Behaviors	—
Binge Drinking	71.2
Current Smoker	19.3
No Leisure Time for Physical Activity	12.0
Climate Change Exposures	—
Wildfire Risk	0.0
SLR Inundation Area	0.0
Children	22.0
Elderly	80.7
English Speaking	46.9
Foreign-born	32.9
Outdoor Workers	6.7
Climate Change Adaptive Capacity	—
Impervious Surface Cover	32.8
Traffic Density	48.5
Traffic Access	0.0
Other Indices	—

Indicator	Result for Project Census Tract
Hardship	88.8
Other Decision Support	—
2016 Voting	4.7

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	90.0000
Healthy Places Index Score for Project Location (b)	2.00000
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	Yes
Project Located in a Low-Income Community (Assembly Bill 1550)	Yes
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	No

a: The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

b: The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

7.4. Health & Equity Measures

No Health & Equity Measures selected.

7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

7.6. Health & Equity Custom Measures

No Health & Equity Custom Measures created.

8. User Changes to Default Data

8.1. Justifications

Screen	Justification
Construction: Construction Phases	Adjusted schedule to match FUSD's Construction Manager's schedule.
Construction: Dust From Material Movement	Input gross phase size for totals acres graded for site preparation and grading.
Construction: Demolition	Input existing building space to be demolished.
Operations: Vehicle Data	Set weekday trip rate to zero since Phase 3 (and total project) will reconstruct existing campus with no additional student capacity or student enrollment.

8.4. Construction

8.4.1. Construction Phases

Phase Type	Phase Name	Model Parameter	Default Value	New Value
Demolition	Demolition	Start Date	6/1/2029	7/2/2029
Demolition	Demolition	End Date	6/29/2029	7/20/2029
Demolition	Demolition	Work Days per Phase	20.0000	15.0000
Site Preparation	Site Preparation	Start Date	6/30/2029	7/21/2029
Site Preparation	Site Preparation	End Date	7/4/2029	7/31/2029
Site Preparation	Site Preparation	Work Days per Phase	3.00000	7.00000
Grading	Grading	Start Date	7/5/2029	8/1/2029
Grading	Grading	End Date	7/13/2029	8/8/2029
Paving	Paving	Start Date	5/19/2030	8/9/2029

Phase Type	Phase Name	Model Parameter	Default Value	New Value
Paving	Paving	End Date	6/2/2030	8/16/2029
Paving	Paving	Work Days per Phase	10.00000	6.00000
Architectural Coating	Architectural Coating	Start Date	6/3/2030	8/17/2029
Architectural Coating	Architectural Coating	End Date	6/17/2030	8/24/2029
Architectural Coating	Architectural Coating	Work Days per Phase	10.00000	6.00000

8.4.4. Dust from Material Movement

Phase Name	Model Parameter	Units	Default Value	New Value
Site Preparation	Total Acres Graded	acres	10.5000	2.49000
Grading	Material Imported	Cubic Yards	—	2,000.00
Grading	Total Acres Graded	acres	6.00000	2.49000

8.5. Operations

8.5.1. Mobile Sources

8.5.1.1. Vehicle Data

Land Use	Model Parameter	Units	Default Value	New Value
Parking Lot	Weekday Primary Trip	%	100.0000	0.00000
Other Non-Asphalt Surfaces	Weekday Primary Trip	%	100.0000	0.00000

Appendix B.1: Historic Architectural Survey Report (HASR)

Historic Architectural Survey Report (HASR)

for the Norseman Elementary School Modernization Project



Prepared by: Karana Hattersley-Drayton, M.A.
Architectural Historian
Johnston and Associates

Prepared for: Michael Gennaro QSD, CPESC
Environmental Specialist
Blair, Church and Flynn

February 1st , 2026

Summary of Findings

The Fresno Unified School District (District) proposes to implement the Norseman Elementary School Modernization Project ("project") using Measure H bond funds. The project would construct a modern two-story approximately 43,600 sq. ft. classroom, library, and administration building, and complete other campus reconfigurations. To accomplish these goals three classroom wings (Buildings H, J, K) will be demolished and the current school office will be demolished and/or reconstructed at the current location.

The Norseman Elementary School campus is located at 4636 E. Weldon Avenue, Fresno, CA 93703, on approximately 12.41 acres bounded by Maple Avenue to the west, Weldon Avenue to the north, University Avenue to the south, and Woodrow Avenue to the east. The campus was designed in 1955 and constructed in 1956 by the local architectural firm of Coates and Metz in one campaign and retains high integrity to its period of significance of 1956 as an example of a Finger-Plan school in a Mid-Century Modern style. Although associated with an architectural firm of importance in the region the buildings are typical of elementary school campuses built throughout the Fresno area. Additionally, although W.D. Coates was a significant figure in regional and state architecture he died in April of 1953, so it is unclear what role he played in the actual design of the campus as the plans were approved two years later by the State Architect in 1955.

Michael Gennaro of Blair, Church and Flynn submitted and received a CHRIS report from the Southern San Joaquin Information Center (Record Search 25-455) which indicated that there are no previous cultural resource studies completed within the project area. Celeste M. Thompson, the Coordinator for the Information Center, recommended that as the proposed Project will demolish buildings that are over 45 years of age, that they "be recorded and evaluated for historical significance by a qualified, professional consultant prior to project activities." (12 November 2025). She further recommended that Mr. Gennaro contact the Native American Heritage Commission in Sacramento regarding any cultural resources which have not been previously recorded.

The resources recorded for this project on State of California DPR survey forms were those proposed for demolition: thus the Administrative Office and the three classrooms wings. This report documents the efforts to identify historic properties that may be affected directly or indirectly by the proposed project pursuant to 36 CFR 800.4 (d) (1). The report also fulfills California Environmental Quality Act (CEQA) requirements that mandate public agencies determine whether a project will have a significant impact on important historical resources. A substantial adverse change in the significant qualities of a historical resource is considered a significant impact. As defined by CEQA, in part, a "historical resource" is a resource listed in, or determined to be eligible for listing in the California Register of Historical Resources (CRHR) [14 California Code of Regulations (CCR) 15064.5 (a)(3)].



Pavement located south of the school parking lot (January 15, 2026)

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- Eligibility to the National, State and/or Local Registers

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- Figure 1: Project Map
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Project Description

The Fresno Unified School District (District) proposes to implement the Norseman Elementary School Modernization Project ("project") using Measure H bond funds. The project would construct a modern two-story approximately 43,600 sq. ft. classroom, library, and administration building, and complete other campus reconfigurations. Existing buildings proposed for demolition consist primarily of portable classrooms and permanent facilities constructed in 1956 (Wings 1-3, Buildings H, J, K and Office) that have exceeded their useful life and exhibit deficiencies in classroom configuration, environmental quality, and site accessibility. The purpose of the project is to replace outdated facilities that no longer meet current building code, accessibility, or educational standards with modern, safe, and efficient learning environments. The project would provide equitable access to modern educational facilities comparable to other recently modernized campuses within the District and would not increase student enrollment or capacity.

The project would occur at the existing Norseman Elementary School campus which is located at 4636 E. Weldon Avenue, Fresno, CA 93703, on approximately 12.41 acres bounded by Maple Avenue to the west, Weldon Avenue to the north, University Avenue to the south, and Woodrow Avenue to the east. The site is designated Public Facilities in the City of Fresno General Plan and zoned Public and Institutional (PI). Norseman Elementary currently enrolls approximately 650 students. Construction would occur in multiple phases to allow continued school operations throughout implementation. Construction is anticipated to begin in March 2028 and conclude in August 2030.

Research Methods

Karana Hattersley-Drayton meets the Secretary of Interior's Professional Qualifications as both an architectural historian and historian. She conducted on-line and archival research and made a site visit to Norseman Elementary School on January 15th 2026 to photograph and record the buildings. Joining her on this visit were Sarah Johnston, Michael Gennaro of Blair, Church and Flynn and Luz Gonzalez of Kitchell. Heidi Heltne of Fresno Unified School District and Michael Gennaro supplied copies of the 1955 architectural plans by W.D. Coates and Maurice Metz which were invaluable. Melissa Scroggins, librarian at the Heritage Center, Fresno County Library, located a folder of newspaper articles about Fresno schools which included one article about the dedication of the new school in 1956. Scroggins also downloaded and sent a copy of a historic photo (c1925) of the earlier Scandinavian School. Drayton consulted with Paul Halajian of Halajian Architects regarding the construction technology used in the classrooms (Wings 1-3).

Historic Overview

Early History and Development of Fresno

The Yokuts were the first residents of the Fresno area, with small tribes occupying the floodplains of the Big Dry Creek and Little Dry Creek (Gayton 1948:153; Latta 1997:163). Although there were no missions established in the Valley, there were small Mexican era settlements including Pueblo de las Junta, located at the confluence of the San Joaquin River and the Fresno Slough (Hoover 1990: 86). The Spanish and Mexican influence is indicated through place names such as “Fresno,” which means “ash tree” and which was first applied to the Fresno River (Hoover et al 1990:85). Following the Gold Rush of 1849, miners were drawn to the southern gold fields, and cattle ranchers and dryland farmers moved into the area. Three momentous changes occurred in the 1870s, which dramatically affected settlement patterns and history: the construction of the Central Pacific Railroad, the introduction of agricultural colonies and the concomitant development of a labyrinth of canals to bring water to these colonies.

In 1870 the Central Pacific Railroad began its diagonal push down the San Joaquin Valley. New towns were surveyed along the corridor---several were planned by the railroad itself---and earlier villages situated away from the tracks often vanished overnight. In 1872 the railroad reached what is now Fresno. Fresno’s location was uninviting at best, with barren sand plains in all directions. The nearest substantial supplies of water were the San Joaquin River, 10 miles to the north (Reps 1979:187) and the Kings River further south. Fresno grew slowly but in 1874 it was able to wrestle the county seat away from the former mining town of Millerton (Hoover 1990:88). The population of Fresno in 1875 was 600, with a third of the residents Chinese who lived west of the tracks.



Courthouse Square Fresno, 1910

The 1880s, however, were prosperous years and the desert was turned into profitable farmland with the introduction of irrigation and agricultural colonies. The model for the system that ultimately served throughout the San Joaquin Valley was the Central California Colony, established in 1875 three miles south of Fresno. The Colony was the “brainchild” of Bernard Marks, a German immigrant who approached William S. Chapman, one of the wealthiest landowners in California, with his vision of 20-acre family owned farms sharing a secured source of water. Marks saw the potential for farming in the desert-like environment of San Joaquin Valley if irrigation could be guaranteed (Panter 1994:2). He surveyed six sections of land owned by Chapman and investor William Martin and subdivided the land into 192 20-acre parcels. Three laterals from the Kings River and Fresno Canal were extended into the tracts and water rights were sold to the prospective farmers. Twenty-three miles of roads were laid out and bordered with trees (Panter 1994; Rehart and Patterson 1988:7). Many of the earliest settlers were former miners as well as Scandinavian immigrants: Danes, Swedes and Norwegians (Rehart and Patterson 1988:8) These colonies helped to break up the vast estates and initiated what agricultural historian Donald Pisani has termed "the horticultural small-farm phase" of California agriculture (Datel 1999:97). Fresno was incorporated in 1885. With incorporation, street grades and town lot numbers were established (Clough 1984:319).

In addition to Chinese and Scandinavian farmers, other early ethnic groups in the Fresno area included Germans from Russia, Japanese and Armenians. The first Armenians arrived in 1881 and eventually settled in an area between the Santa Fe and Southern Pacific tracks appropriately called “Armenian Town” (Bulbulian 2001:37-38). African-Americans were also present early on and organized an African Methodist Church in 1882 (Clough 1984:137).

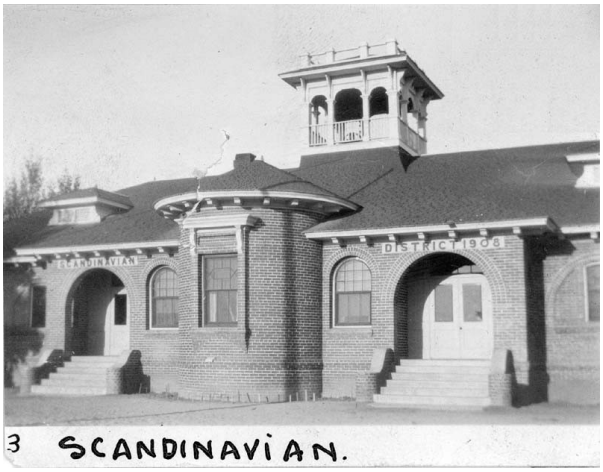
The raisin industry developed in the 1870s, after the scorching heat of 1875 dried grapes on the vine (Hoover 1990:91). Martin Theodore Kearney who left employment with the Central California Colony and eventually became one of the wealthiest landowners in the area served as the President of the first California Raisin Growers Association from 1898 to 1904. The Sun-Maid Raisin Cooperative was founded in 1911 and became one of the most successful in America. Fresno became the principal-packing center for the raisin grape

industry with numerous packinghouses in the city. Other crops such as figs and stone fruits helped to diversify the local economy and Fresno became the market town for a large portion of the San Joaquin Valley (Reps 1979:192). It is now a city of 500,000 and the center of the richest agricultural county in the United States (Haslam 1993:194).

The Scandinavian Colony/Scandinavian School District

By 1903 there were 48 separate colonies or tracts in Fresno County representing approximately 71,080 acres (Panter 1994:9). These Colonies initially were marketed to specific groups, such as the Temperance Colony and the Scandinavian Colony which was founded in 1878 on a former grain ranch three miles northeast of Fresno owned by Henry Voorman. The land was subdivided into lots and water rights were sold for irrigation. The first settlers arrived in the summer of 1879 and were predominantly from Denmark although the exclusion of other ethnic groups was not strictly enforced (Thickens 1942:52-53). A 20-acre lot initially sold for $450 and the colony was sold out by April 1882 (Clough and Secrest 1984:144). Two more sections were eventually added to the Scandinavian Colony which increased the acreage to 1,920. Voorman donated four acres for a school and the colonists took up collections for the construction of a schoolhouse (Thickens 1942:52-54).

The Scandinavian District was created about 1883 and eventually merged with the Fresno School District in 1960. A brick schoolhouse, the Scandinavian Elementary School was constructed in 1908 near the intersection of Shields and Sierra Vista Avenues and was demolished before the 1950s (Abstract, photo Fresno County Library). The current Norseman Elementary School was apparently the third in this small district and was constructed at the current location in 1956 (Coates and Metz plans 1955, Fresno Bee 30 May 1956).



Findings and Conclusions

The proposed project includes the demolition of three classroom wings and the Office/Administration Building. All four buildings were evaluated for their eligibility to the California Register of Historical Resources and were recorded on Primary and BSO Forms (see attached).

The Norseman Elementary School was completed in one campaign and has high integrity to his period of significance of 1956 as an example of a Finger Plan School as first developed in the Fresno area in 1937 by architect Ernest Kump Jr. The Finger Plan" campus was a series of modular, one story buildings which included 4-5 classrooms in each. These "fingers" often were sited east to west and had clerestory windows on the south elevation and larger double hung sash windows on the north, providing for diffused light and ventilation. The buildings were connected to one another by covered open corridors supported by pipe columns which opened onto an "outdoor classroom." ("Guide to School Site Analysis and Development";"mid-century Modernism Historic Context" 2008:44).

However, the Norseman Elementary School is neither among the earliest nor an exemplary example of this plan which was used extensively throughout Fresno and indeed California in the 1940s on. Additionally, although W. D. Coates in particular played a critical role in local and even California architecture (serving as the State Architect from 1909 to 1911) he died in April of 1953 and it is unclear what role he played in the design of the campus, even assuming a lag time between design and approval by the State Architect in 1955.

Pursuant to Public Resources Code 5024.1(g) the four buildings are therefore not considered historical resources for the purposes of the California Environmental Quality Act (CEQA).

Regulatory Context

The California Environmental Quality Act (1970) requires consideration of project impacts on archaeological or historical sites deemed to be "historical resources." A substantial adverse change in the significant qualities of a historical resource is considered a significant impact. For the purposes of CEQA, a "historical resource" is a resource listed in, or determined to be eligible for listing in, the California Register of Historical Resources (CRHR). Historical resources may include, but are not limited to:

> *A resource included in a local register of historical resources… or identified in an historical resource survey meeting the requirements section 5024.1(g) of the Public Resources Code…*
>
> *Any object, building, structure, site, area, place, record or manuscript which a lead agency determines to be historically significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California. . .[14 California Code of Regulations (CCR) 15064.5(a)(3)].*

The eligibility criteria for the California Register are the definitive criteria for assessing the significance of historical resources for the purposes of CEQA (Office of Historic Preservation n.d.). Generally, a resource shall be considered "historically significant" if it meets the criteria for listing on the CRHR, as defined in the Public Resources Code (PRC) below, and it has been found and/or treated eligible by the State Historical Resources Commission or the local agency:

> *(1) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.*
>
> *(2) Is associated with the lives of persons important in our past.*
>
> (*3) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.*
>
> *(4) Has yielded, or may be likely to yield, information important in prehistory or history. [PRC 5024.1(c)].*

Eligibility to the California Register of Historical Resources

No federal funds or federal permits are anticipated for this proposed project. Thus each building was evaluated under CEQA guidelines only and for the potential of the proposed project to significantly impact a historic resource.

Map Reference #1: The Administration Office is a one-story south facing building with a rectangular plan. It was designed by the firm of Coates and Metz (with plans approved in 1955) in a Mid-Century modern style as part of the original campus. The building's east elevation is partially clad in Roman style brick, which was a common construction and decorative feature of buildings of this era. Roman brick is also used on a stout pier located on the southeast corner of the roof to support the covered walkway and entrance. W.D. Coates was a significant figure in local architecture and served as the California State architect from 1909 to 1911. He formed a partnership with his former college classmate, H.B. Traver and together they designed several significant buildings including the Liberty Theatre (1917) in Fresno and Hanford High School (1920). In 1948 he formed a partnership with Maurice Metz that lasted until 1953. Coates died on April 26th, 1953 and Norseman School is a final project from this firm; it is unclear how much Coates played in the design of the school. Metz went on to design a "Shop and Homemaking Building Addition" for the Scandinavian School under his own name with the plans approved April 30th 1958. Although the Norseman School Office is a fine example of Mid-Century style architecture it does not appear to meet the eligibility for individual listing on the California Register of Historical Resources. However, it is recommended that architectural details such as the use of Roman-style brick be incorporated into the proposed new complex.



Map Reference #2-4: Wings 1-3 (Buildings H, J, K) were designed in 1955 and constructed in 1956 in the Finger Plan model. They are one room deep linear classrooms with multiple windows including a row near the cornice line of north facing clerestory windows. These classrooms were under construction when the school was dedicated on May 31st 1956 and were designed as was the whole campus by the architectural firm of Coates and Metz. These wings are smaller versions of other classroom buildings on the campus which will remain in place. They are a common style of building used on schools throughout the area (and indeed California).



Wing 1 (Building H) south elevation; north elevation



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"Scandinavian Elementary School, Fresno, California" photo 1925?

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Preparer's Qualifications

Karana Hattersley-Drayton has a B.A., an M.A. and completed three years of Ph. D. work in Architecture History, all at U.C. Berkeley. She previously served on the California State Historical Resources Commission as well as the Board of Directors for the Vernacular Architecture Forum. She edited and wrote several articles for the 2008 VAF publication, “Architecture, Ethnicity and Historic Landscapes of California's San Joaquin Valley” which won both a California Preservation Foundation award as well as a Governor's Historic Preservation award. Ms. Drayton moved to the San Joaquin Valley in 1999 to work as an Architectural Historian for Caltrans, District 06 and from 2002 to January 2017 served as the City of Fresno's Historic Preservation Project Manager. In addition to consulting on environmental review projects, she currently teaches Architecture History and Historic Preservation in the Architecture Program, Lyles College of Engineering, California State University, Fresno.

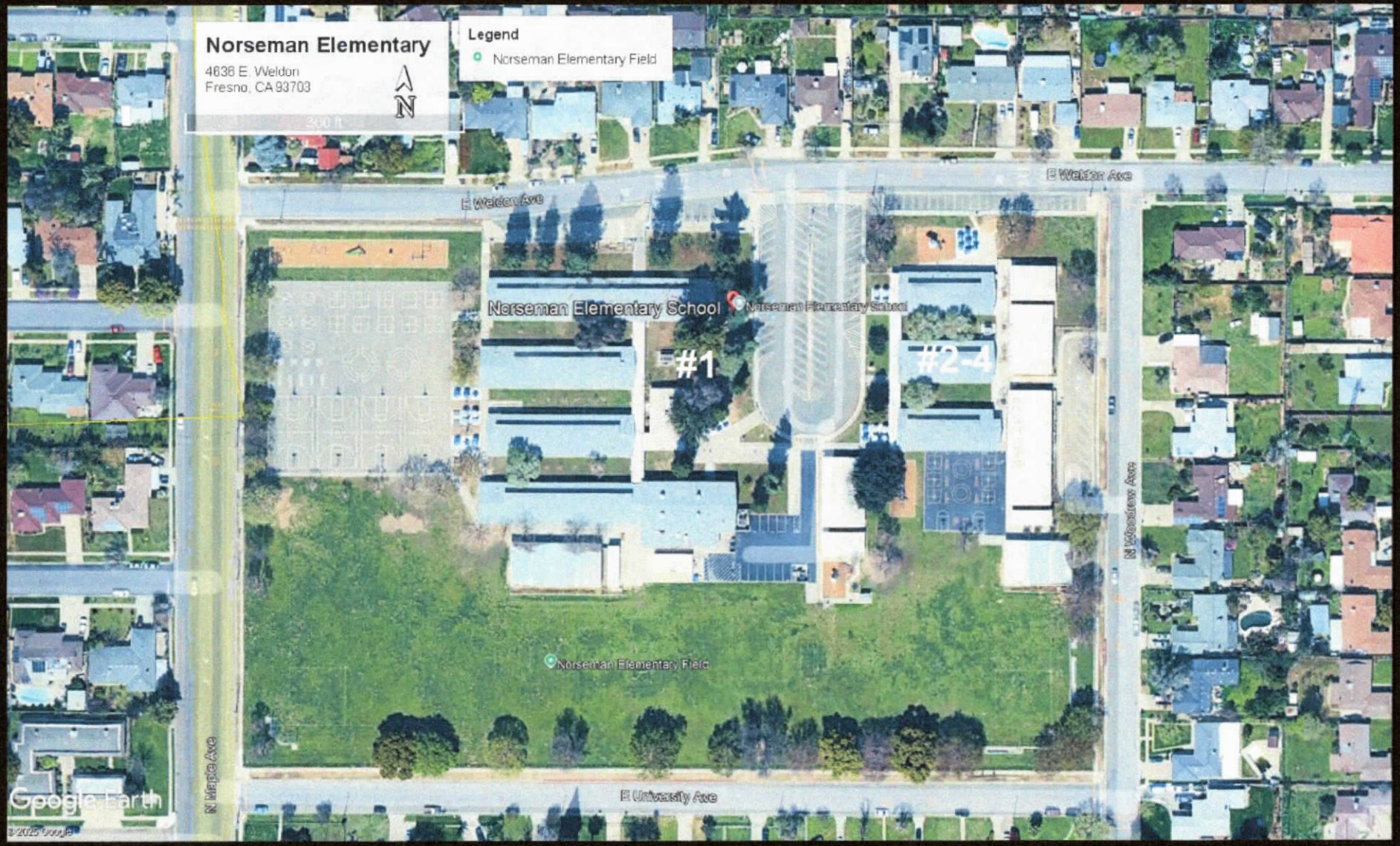


Figure 1: APE Map for Norseman Elementary School Modernization Project

State of California — The Resources Agency
DEPARTMENT OF PARKS AND RECREATION

PRIMARY RECORD

Primary #_____
HRI #_____
Trinomial_____
NRHP Status Code_____
Other Listings_____
Review Code_____ Reviewer_____ Date_____

Map Ref. #1

P1. Resource Name(s) or Number: Administration Office, Norseman Elementary School, Fresno
***P2. Location: *a. County:** Fresno
***b. USGS 7.5' Quad:** Clovis USGS
c. Address: 4636 E. Weldon Avenue, Fresno California 93703
d. Assessor's Parcel Number: 447-280-01T and 447-280-18T

***P3a. Description:** The school office building is one story with a rectangular plan and is sited north and south with the main entrance through a metal and glass door on the south elevation. The nominally flat roof has a boxed cornice. The east elevation faces onto the parking lot and is partially clad in Roman-style brick; "Norseman Elementary School" is displayed on this brick elevation (see image report cover). One decorative pier of Roman brick located on the southeast corner supports the roof which extends out to make a covered walkway. A series of vertical panels of windows on the east elevation include at least one hinged window each which can be opened. These windows have brick lug sills laid up in a soldier course (thus perpendicular to the bricks at the foundation).. The west elevation includes a metal and glass door at the northwest end and a series of windows consisting of three lights each, with the middle window hinged. The north elevation of the building includes a series of five windows of three lights, similar to those on the west side of the building.

***P3b. Resource Attributes:** HP15 (Educational Building)
***P4. Resources Present:** ●Building



P5b Photo date: 15 January 2026

***P6. Date Constructed/Age and Sources:** 1956. Architectural drawings: Coates and Metz Architects. approved June 27th 1955. Annex approved December 29 1955.

***P7. Owner and Address:**
Fresno Unified School District
2309 Tulare
Fresno CA 93721-2287

***P8. Recorded by:**
Karana Hattersley-Drayton, M.A. 4110 N. Maroa Avenue
Fresno 93704

***P9. Date Recorded:**
15 January 2026

***P10. Survey Type:** Intensive

***P11. Report Citation:** "Historic Architectural Survey Report for the Norseman Elementary School Modernization Project"
***Attachments:** ●Building, Structure and Object Report; ●Continuation Sheet

***Recorded by**: Karana Hattersley-Drayton, M.A. ***Date:** 19 January 2026 ■ Continuation



East Elevation; West Elevation; Medallion on South Elevation



State of California — The Resources Agency
DEPARTMENT OF PARKS AND RECREATION

Primary #_____
HRI#_____

BUILDING, STRUCTURE, AND OBJECT RECORD

***NRHP Status Code**: 6Z

***Resource Name:** Norseman Elementary School, Fresno

B3. Original Use: Elementary School **B4. Present Use**: Elementary School

***B5. Architectural Style:** Mid-Century Modern

***B6. Construction History:** Architectural drawings: Coates and Metz Architects. approved by the State June 27th 1955. Annex approved December 29 1955.

***B7. Moved? ■No**

***B8. Related Features:** The 12.41 acre site is bounded by Maple Avenue to the west, Weldon Avenue to the north, University Avenue to the south, and Woodrow Avenue to the east and is located within a residential neighborhood.

B9a. Architect: Coates and Metz **B9b. Builder**: Unknown

***B10. Significance: Theme:** Education **Area:** Fresno, (Scandinavian/Fresno School Districts)

Period of Significance: 1956 **Property Type:** School **Applicable Criteria:** N/A

The Norseman Elementary School was constructed in 1956 as the third in the Scandinavian School District. Of interest is that the campus was built in one campaign, with the exception of the "Annex" (Wings 1-3/H, J, K) which was under construction when the school was dedicated on May 31st, 1956. The campus therefore has high integrity to its period of significance of 1956 and is a good example of a Finger Plan School in a Mid-Century Modern design by W.D. Coates and Maurice Metz. W.D. Coates is a significant figure in Fresno County architecture and served as the California State architect from 1909 to 1911. Commissions with former business partner H.B. Traver included Fresno High School and Hanford High School. In 1949 he formed a partnership with Maurice Metz. Coates died in April 1953 and it is thus iunclear how much of a role he played in the actual design of this campus. The Norseman School is a good but typical example of school design in the Fresno area. The removal of Wings 1-3 will not adversely affect the design of the remaining Finger-Plan campus. Neither these wings nor the School Office appear to meet the threshold for individual eligibility to the California Register of Historical Resources nor are they contributors to a historic district. However, it is recommended that the character defining features of the Mid-Century Modern office be replicated or even retained with the reconstruction of this building.



***B12. References:** Personal Communication Paul Halajian 21 January 2026; Scandinavian School No. 3 Coates and Metz Architects. Date approved June 27th 1955. Annex to Nordic School, Corner of Maple and Weldon Avenues, Scandinavian Elementary School District, Coates and Metz Architects. Approved State Office of the Architect December 29 1955 "Scandinavian Elementary School, Fresno, California" photo 1925(?) (Heritage Center, Fresno County Library); "Dedication Rites for Norseman School Are Set" *Fresno Bee* May 30th 1956 B1; Powell, John Edward."W.D. Coates (1880-1953)" in "A Guide to Historic Architecture in Fresno, California," 1996.

***B14. Evaluator:** Karana Hattersley-Drayton, M.A.
Johnston and Johnston and Associates

***Date of Evaluation:** 1 February 2026

(This space reserved for official comments.)

State of California — The Resources Agency
DEPARTMENT OF PARKS AND RECREATION

PRIMARY RECORD

Primary #_____
HRI #_____
Trinomial_____
NRHP Status Code_____
Other Listings_____
Review Code_____ Reviewer_____ Date_____

Map Ref. 2-4

P1. Resource Name(s) or Number: Norseman Elementary School, Fresno
***P2. Location: *a. County:** Fresno
***b. USGS 7.5' Quad:** Clovis USGS
c. Address: 4636 E. Weldon Avenue, Fresno California 93703
d. Assessor's Parcel Number: 447-280-01T and 447-280-18T

***P3a. Description:** Wings 1-3 (H, J, K) are located on the east side of the campus and are designed in the classic "Finger Plan" which was first developed and introduced in the Fresno County area in 1937. Thus the three wings are all linear one room deep, modular one-story classrooms that are parallel to one another and sited east to west. The medium pitch gable roof has a deep overhang and the cornice is boxed. The east gable end of Wing 1 (Building H) extends further from the plane of the building and is supported by four metal poles to provide a shaded entry to the bathrooms (photo below). A double set of windows on the south elevations is hinged allowing the top window to be opened. The north elevations of all three wings include a bank of parallel windows as well as a row of clerestory windows above, which allows diffused light to enter the classroom (see photo on Continuation sheet). The construction is post and beam with "lally" columns, slender steel pipe columns that are sometimes concrete filled. "Lally columns were often used in mid-century modern architecture where a juxtaposition of lightness and thinness was set in contrast to heavy/massive masonry load bearing columns typical in pre-modern architecture." (Halajian 21 January 2026). The buildings are stucco clad. A covered walkway on the west elevation connects the three wings.
***P3b. Resource Attributes:** HP15 (Educational Building)
***P4. Resources Present:** ●Building



P5b Photo date: 15 January 2026

***P6. Date Constructed/Age and Sources:** 1956. Architectural drawings: Coates and Metz Architects. approved June 27th 1955. Annex approved December 29 1955.
***P7. Owner and Address:**
Fresno Unified School District
2309 Tulare
Fresno CA 93721-2287

***P8. Recorded by:**
Karana Hattersley-Drayton, M.A.
4110 N. Maroa Avenue
Fresno 93704

***P9. Date Recorded:**
15 January 2026

***P10. Survey Type:** Intensive
***P11. Report Citation:** "Historic Architectural Survey Report for the Norseman Elementary School Modernization Project"
***Attachments:** ●Building, Structure and Object Report; ●Continuation Sheet



North elevation of wing 1; Corridor on west elevation of wings; Interior classroom wing 2





Resource: Office, Norseman Elementary School, Fresno

***Recorded by**: Karana Hattersley-Drayton, M.A. ***Date:** 19 January 2026 ■ Continuation



North elevation of Wing 1 (H); North elevation of Wing 3 (K)



Appendix B.2: Letter to File, Addendum to Historic Review






May 28th, 2026

To: Michael Gennaro, Environmental Specialist
Blaire, Church and Flynn

From: Karana Hattersley-Drayton, M.A.
Architecture Historian
(Johnston and Associates)
4110 N. Maroa Avenue
Fresno, CA 93704

Re: Letter to File, Addendum to Historic Review for Proposed Norseman Elementary School Modernization Project

The Fresno Unified School District (District) proposes to modernize facilities at the Norseman Elementary School, 4636 E. Weldon Avenue, Fresno (APN: 447-280-01T and 447-280-18T) using Measure H bond funds. The project would potentially demolish existing buildings, and reconstruct and renovate existing facilities in a phased approach. On October 8th, 2025, Johnston and Associates was hired to provide the architectural review for four District buildings, including a first phase at Norseman.

On February 1st, 2026 Karana Hattersley-Drayton M.A., architectural historian for Johnston and Associates, completed and filed a Historic Architectural Survey Report for three classroom wings and the Office/Administration Building at the school which are slated for potential demolition as part of this Modernization Project. The classroom buildings are located on the eastern side of the campus and were identified on the FUSD map as Buildings H, J and K. Building J was mislabeled and is actually Building "I". All four buildings were evaluated for their eligibility to the California Register of Historical Resources and were recorded on Primary and BSO Forms.

The campus was designed in 1955 by the local architectural firm of Coates and Metz and constructed in 1956 in one campaign. The complex retains high integrity to its period of significance of 1956 as an example of a Finger-Plan school in a Mid-Century Modern style. Although associated with an architectural firm of importance in the region the buildings are typical of elementary school campuses built throughout the Fresno area during this period. Additionally, although W.D. Coates was a significant figure in regional and state architecture

he died in April of 1953, so it is unclear what role he played in the actual design of the campus as the plans were approved two years later by the State Architect in 1955. Hattersley-Drayton concluded that the four buildings were therefore not eligible for either the California Register of Historical Resources nor Fresno's Local Register of Historic Resources. Pursuant to Public Resources Code 5024.1(g) the four buildings were therefore not considered historical resources for the purposes of the California Environmental Quality Act (CEQA).

Building J Review: The District has now revised its scope and plans to adapt Building J, located on the main section of the campus, as a library. The proposal would not expand the building's footprint but would include extensive improvements to the interior of the 3 classroom building to accommodate its new use as a library. Exterior modifications would be minimal. A character-defining feature of Finger-Plan schools, the clerestory windows on the north elevation which provide natural lighting, would be maintained.

In May 2026, Johnston and Associates was retained to provide a historic review of Building J and on May 27th Karana Hattersley-Drayton, Sarah Johnston, Michael Gennaro and a representative of the District, met at the school. Ms. Drayton photographed and recorded Building J and later prepared the survey forms, as attached.

Findings: The eligibility criteria for the California Register of Historical Resources are the definitive criteria for assessing the significance of historical resources for the purposes of CEQA (Office of Historic Preservation n.d.). Potential resources must generally be 50 years of age and have integrity to their period of significance to be considered. Additionally, the resource must have historic significance under one or more criterion:

> *(1) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.*
>
> *(2) Is associated with the lives of persons important in our past.*
>
> *(3) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.*
>
> *(4) Has yielded, or may be likely to yield, information important in prehistory or history. [PRC 5024.1(c)].*

Building J will not be demolished but will only be adaptively reused as a library. The building retains integrity to its period of significance of 1956 and is a contributor to the overall finger-plan campus. The proposed work will not affect the character-defining features of this classroom building and thus the project does not create an adverse change to the resource. Currently the building does

not meet the threshold for individual eligibility to the California Register of Historical Resources nor is it currently a contributor to a potential historic district.

Karana Hattersley-Drayton *has a B.A. and M.A. from UC Berkeley where she also completed three years of coursework towards the Ph. D. in Architectural History. Ms. Drayton moved to Fresno in 1999 to work for Caltrans and in 2002 was hired by the City of Fresno as the Historic Preservation Project Manager, a position from which she retired in 2017. She currently teaches Architecture History and Historic Preservation in the College of Engineering, California State University, Fresno.*

Attached: DPR forms and APE Map for Building J, Norseman Elementary School

State of California — The Resources Agency
DEPARTMENT OF PARKS AND RECREATION

PRIMARY RECORD

Primary #_____
HRI #_____
Trinomial_____
NRHP Status Code_____
Other Listings_____
Review Code_____ Reviewer_____ Date_____

P1. Resource Name(s) or Number: Norseman Elementary School, Fresno (Building J)
***P2. Location: *a. County:** Fresno
***b. USGS 7.5'** Quad: Clovis USGS T13S R13S, Section 25
c. Address: 4636 E. Weldon Avenue, Fresno California 93703
d. Assessor's Parcel Number: 447-280-01T and 447-280-18T

***P3a. Description:** Building J is part of the original 1955-6 campus and faces north onto E. Weldon. It is designed in the classic "Finger Plan" which was first developed and introduced in the Fresno County area in 1937. Thus it is a linear one room deep, one-story building and is sited east to west. It includes three separate classrooms (#6-8), and is connected by a breezeway to Building A on its west end. The medium pitch gable roof has a deep overhang and the cornice is boxed. The south elevation includes a solid door for each room and a double set of windows along the cornice. The roof on the this elevation is steeply cantilevered to provide shade for the corridor in front of the classrooms. The north elevation has a bank of windows, vertically set in sets of four as well as a clerestory of windows above with two lights each. The clerestory shed roof is slanted upward which allows maximum diffused light to enter the classroom. The building is stucco clad and the construction is post and beam with "lally" columns, slender steel pipe columns that are sometimes concrete filled. "Lally columns were often used in mid-century modern architecture where a juxtaposition of lightness and thinness was set in contrast to heavy/massive masonry load bearing columns typical in pre-modern architecture." (Paul Halajian 21 January 2026).

P3b. Resource Attributes: HP15 (Educational Building)
***P4. Resources Present:** ●Building



P5b Photo date: 27 May 2026

***P6. Date Constructed/Age and Sources:** 1956. Architectural drawings: Coates and Metz Architects. approved June 27th 1955. Annex approved December 29 1955.

***P7. Owner and Address:**
Fresno Unified School District
2309 Tulare
Fresno CA 93721-2287

***P8. Recorded by:**
Karana Hattersley-Drayton, M.A.
4110 N. Maroa Avenue
Fresno 93704

***P9. Date Recorded:**
27 May 2026

***P10. Survey Type:** Intensive
***P11. Report Citation:** Addendum to ""Historic Architectural Survey Report for the Norseman Elementary School Modernization Project."
***Attachments:** ●Building, Structure and Object Report; ●Continuation Sheet

***Recorded by**: Karana Hattersley-Drayton, M.A. ***Date:** 27 May 2026 ■ Continuation







Top image: south elevation of Building J. Lower left, outside corridor looking west along south elevation. Top right, Building J, breezeway and connection to Building A.

State of California — The Resources Agency
DEPARTMENT OF PARKS AND RECREATION

Primary #_____
HRI#_____

BUILDING, STRUCTURE, AND OBJECT RECORD

***NRHP Status Code**: 6Z

***Resource Name:** Norseman Elementary School, Fresno (Building J)

B3. Original Use: Elementary School **B4. Present Use**: Elementary School

***B5. Architectural Style:** Mid-Century Modern

***B6. Construction History:** Architectural drawings: Coates and Metz Architects. approved by the State June 27th 1955. Annex approved December 29 1955.

***B7. Moved? ■No**

***B8. Related Features:** The 12.41 acre site is bounded by Maple Avenue to the west, Weldon Avenue to the north, University Avenue to the south, and Woodrow Avenue to the east and is located within a residential neighborhood.

B9a. Architect: Coates and Metz **B9b. Builder**: Unknown

***B10. Significance: Theme:** Education **Area:** Fresno, (Scandinavian/Fresno School Districts)

Period of Significance: 1956 **Property Type:** School **Applicable Criteria:** N/A

The Norseman Elementary School was constructed in 1956 as the third in the Scandinavian School District. Of interest is that the campus was built in one campaign, with the exception of the "Annex" (Wings 1-3/H, I, K) which was under construction when the school was dedicated on May 31st, 1956. The campus therefore has high integrity to its period of significance of 1956 and is a good example of a Finger Plan School in a Mid-Century Modern design by W.D. Coates and Maurice Metz. W.D. Coates is a significant figure in Fresno County architecture and served as the California State architect from 1909 to 1911. Commissions with former business partner H.B. Traver included Fresno High School and Hanford High School. In 1949 he formed a partnership with Maurice Metz. Coates died in April 1953 and it is thus unclear how much of a role he played in the actual design of this campus. The Norseman School is a good but typical example of school design in the Fresno area and the proposed adaptive reuse of Building J will not adversely affect the design of the campus. Building J. is over 50 years of age and has integrity to its period of significance. However the building does not appear to meet the threshold for individual eligibility to the California Register of Historical Resources nor is it a contributor to a historic district.



***B12. References:** Personal Communication Paul Halajian 21 January 2026; Scandinavian School No. 3 Coates and Metz Architects. Date approved June 27th 1955. Annex to Nordic School, Corner of Maple and Weldon Avenues, Scandinavian Elementary School District, Coates and Metz Architects. Approved State Office of the Architect December 29 1955 "Scandinavian Elementary School, Fresno, California" photo 1925(?) (Heritage Center, Fresno County Library); "Dedication Rites for Norseman School Are Set" *Fresno Bee* May 30th 1956 B1; Powell, John Edward."W.D. Coates (1880-1953)" in "A Guide to Historic Architecture in Fresno, California," 1996.

***B14. Evaluator:** Karana Hattersley-Drayton, M.A.
Johnston and Associates

***Date of Evaluation:** 27 May 2026

(This space reserved for official comments.)



Figure 1: Addendum, APE Map for Norseman Elementary School Modernization Project

Appendix C: Phase I Environmental Site Assessment

See separate file for due to file size

Appendix D: Physical Safe Route to School Analysis

Physical Safe Route to School Analysis

For The Proposed

Norseman Elementary School Reconstruction Project

Fresno, CA

Fresno Unified School District

2309 Tulare Street
Fresno, CA 93721
https://www.fresnounified.org

Environmental Consultant

Blair, Church & Flynn Consulting Engineers, Inc.
451 Clovis Avenue, Suite 200
Clovis, CA 93612
www.bcf-engr.com

June 2026

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1.0 Introduction

This Physical Safe Routes to School Analysis has been prepared for Fresno Unified School District (District) as a supporting technical appendix to the Initial Study/Mitigated Negative Declaration (IS/MND) for the Norseman Elementary School Reconstruction Project ("project"). The analysis documents the existing pedestrian and bicycle environment within the attendance boundary of the elementary school and provides context for evaluating potential transportation safety impacts of the project under the California Environmental Quality Act (CEQA). The report focuses on the physical characteristics of the surrounding roadway network, including sidewalk, crosswalk, and bicycle facility connectivity, as well as posted speed limits and general roadway conditions relevant to pedestrian and bicyclist travel.

1.1 Purpose of Analysis

The purpose of this analysis is to identify and describe the existing conditions affecting pedestrian and bicycle travel within the school attendance boundary and to inform the CEQA assessment of transportation safety. Specifically, this report evaluates the presence, continuity, and connectivity of sidewalks, crosswalks, and bicycle facilities, along with roadway characteristics such as speed limits and functional classifications. The analysis is intended to provide a baseline understanding of the built environment that supports student travel to and from school and to document whether the proposed project would result in conditions that could adversely affect pedestrian or bicycle safety.

1.2 Scope and Limitations

This analysis is limited to an evaluation of the existing physical environment and roadway characteristics within the defined Norseman Elementary School attendance boundary. The study focuses on publicly accessible transportation infrastructure, including sidewalks, crosswalks, bicycle facilities, roadway classifications, and posted speed limits, as well as general pedestrian and bicycle connectivity across the local circulation network.

This report is intended to document baseline conditions for CEQA review and does not include detailed operational, engineering, or behavioral analyses. Specifically, this report does not evaluate:

1. **School Operational or Programmatic Factors**
   School district operations or programs, including student travel procedures, crossing guard assignments, supervision practices, Safe Routes to School programming, and transportation safety education initiatives. The District currently provides, and would continue to provide, crossing guards, school bus services, and other Safe Routes to School programmatic support; however, these programs are outside the scope of this report and are not elements of the proposed project.

2. **Engineering Design and Facility Condition**
   Detailed engineering assessments of infrastructure, including pavement, sidewalk, crosswalk, and other pavement marking condition, structural integrity, ADA compliance, drainage, signing/striping design specifications, or site-specific design improvements.

3. **Collision and Safety Data Analysis**
   Historical traffic collision data, collision rates, safety performance metrics, or quantitative risk analysis.

4. **Traffic Operations and Capacity**
   Traffic volumes, intersection level of service (LOS), vehicle delay, queuing, or operational performance of the roadway network.

5. **Transit and School Transportation Facilities**
   Detailed evaluation of public transit service, school bus operations, public bus stop locations, routing, or transit accessibility.

6. **Travel Behavior and Mode Choice**
   Data or analysis related to how students travel to and from school, including walking, bicycling, transit use, or vehicle travel patterns.

7. **Lighting, Personal Security, and Enforcement**
   Street lighting conditions, law enforcement presence, or detailed assessment of personal security factors, beyond general observations of the built environment.

8. **Future Planned Improvements**
   Planned or programmed transportation improvements not yet constructed.

9. **Comprehensive Safe Routes to School Planning**
   Development of a full Safe Routes to School Plan, including stakeholder engagement, prioritization of improvements, or implementation strategies.

The findings of this report are intended to support a program-level CEQA evaluation of transportation safety conditions associated with the project. This analysis provides a qualitative baseline of existing infrastructure and connectivity and does not prescribe specific design solutions or identify required improvements beyond those evaluated as part of the CEQA process.

1.3 Project Description

The proposed project is located at the existing Norseman Elementary School campus at 4636 E. Weldon Avenue in the City of Fresno, California (APNs 447-280-01T and 447-280-18T), and includes the surrounding public roadway network bounded by Weldon Avenue, Woodrow Avenue, University Avenue, and Maple Avenue.

The Fresno Unified School District proposes to implement the Norseman Elementary School Modernization Project using Measure H bond funds. The approximately 12.4-acre campus would undergo phased demolition, reconstruction, and renovation to replace aging facilities with modern instructional, administrative, and support spaces designed to meet current educational standards and applicable regulatory requirements. Roads and sidewalk immediately surrounding the school may also have minor improvements, over an approximately 2.8-acre area, leading to a total project size of approximately 15.2 acres.

At full buildout, the project would modernize the existing campus without increasing student enrollment or operational capacity. Improvements would include construction of new classroom and administrative buildings, an early learning facility, upgraded play and outdoor learning areas, and reconfiguration of on-site parking and circulation patterns to improve campus functionality. The project would modify campus access points and internal circulation, including the addition of a student drop-off loop and expanded parking areas and removal of on-street parking stalls. Total parking would increase from 116 existing stalls to approximately 175 stalls. While final design details may be refined, development would remain within the existing campus footprint and within the maximum development envelope evaluated in the IS/MND.

As a result of changes to site access and circulation, the project may require limited off-site transportation-related improvements within the public right-of-way, subject to review and approval by the City of Fresno and applicable safety standards. Such improvements could include modifications to signage, pavement markings, crosswalks, or other traffic calming or active transportation features intended to maintain or enhance pedestrian and bicycle safety. The specific scope and location of any off-site improvements would be determined during final design and coordination with the City.

Construction would occur in multiple phases between approximately June 2028 and August 2029, allowing the school to remain operational throughout implementation. Overall, the project would continue to rely on the existing surrounding roadway network and would not substantially alter area-wide circulation patterns affecting pedestrian or bicycle travel within the school attendance boundary.

A diagram of the existing project site and proposed conceptual project design can be seen in Exhibits 1 and 2.

Exhibit 1: Existing Project Site Diagram



Exhibit 1: Proposed Conceptual Project Design



2.0 Regulatory Framework

2.1 State of California

The State of California has established a comprehensive regulatory and policy framework that emphasizes roadway safety, multimodal access, and the accommodation of pedestrians and bicyclists of all ages and abilities, including school-aged children. At a statewide level, transportation planning and design are guided by the principles of the Safe Systems approach and related Vision Zero-type initiatives, which prioritize the reduction and ultimate elimination of traffic-related fatalities and serious injuries. These efforts promote a data-driven and systemwide approach to roadway safety, including the identification of high-risk locations and the implementation of targeted improvements to enhance pedestrian and bicycle safety (Caltrans 2022).

Consistent with these safety goals, the California Department of Transportation (Caltrans) has adopted a Complete Streets policy (Deputy Directive 64-R2 and Director's Policy 37), which requires that transportation facilities be planned, designed, constructed, operated, and maintained to serve all users, including pedestrians, bicyclists, transit riders, and motorists. This policy recognizes that bicycle and pedestrian travel is an integral component of the transportation system and establishes that all transportation projects should consider opportunities to improve safety, mobility, and access for non-motorized users. At the local level, the California Complete Streets Act of 2008 further requires cities and counties to plan for balanced, multimodal transportation networks that meet the needs of all roadway users (Caltrans 2014) (Caltrans 2021).

California also promotes active transportation through statewide programs and planning efforts that focus on increasing walking and bicycling while improving safety and connectivity. The Active Transportation Program (ATP), established by Senate Bill 99, serves as the State's primary funding and policy mechanism for pedestrian and bicycle improvements. The ATP seeks to increase the proportion of trips made by walking and bicycling, improve safety and mobility for non-motorized users, and enhance public health while supporting greenhouse gas reduction goals. In addition, the State's Bicycle and Pedestrian Plan ("Toward an Active California") establishes a long-term vision in which walking and bicycling are safe, convenient, and comfortable travel options that are fully integrated into the broader transportation system across all communities (Caltrans n.d.).

Specific to school-related travel, California supports Safe Routes to School (SRTS) policies and programs that are intended to improve the safety and accessibility of walking and bicycling to schools. These efforts emphasize improvements to the built environment, such as sidewalks, crosswalks, and bicycle facilities, as well as broader strategies to reduce traffic conflicts and enhance safety near school campuses. SRTS initiatives are closely aligned with ATP funding and statewide goals to reduce collisions, improve health outcomes, and increase the use of active transportation modes among students (Caltrans n.d.).

The California Vehicle Code establishes enforceable safety requirements governing interactions between motorists, pedestrians, and bicyclists. State law requires drivers to yield the right-of-way to pedestrians within marked and unmarked crosswalks and to exercise due care to avoid collisions, including reducing speed as necessary to ensure pedestrian safety. In school areas, state law establishes a standard speed limit of 25 miles per hour when children are present, with the ability for local jurisdictions to implement lower speed limits in designated school zones. Additional provisions recognize bicyclists as lawful roadway users and establish their rights and responsibilities, reinforcing the need to accommodate bicycle travel within public rights-of-way.

Finally, state guidance related to school site planning and design emphasizes the importance of providing safe and efficient circulation for pedestrians and vehicles in school environments. This includes consideration of access points, circulation patterns, and the interface between on-site and off-site transportation facilities to support safe student travel (California Department of Education 2025).

Collectively, these state policies and regulations establish a framework that prioritizes safe, connected, and multimodal transportation systems, with particular attention to protecting vulnerable users such as pedestrians, bicyclists, and school children. These provisions support the evaluation of existing pedestrian and bicycle infrastructure, roadway characteristics, and safety conditions within the school attendance boundary as documented in this analysis.

2.2 County of Fresno / Fresno Council of Governments (FCOG)

Fresno County, in coordination with regional agencies, has developed policies and programs that support transportation safety, multimodal connectivity, and improved conditions for pedestrians and bicyclists, including school-aged users. The Fresno Council of Governments (Fresno COG), as the regional transportation planning agency, prepares long-range planning documents such as the Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS), which establishes a framework for maintaining and improving the regional transportation network to support mobility and connectivity across Fresno County. While the RTP/SCS identifies planned transportation projects and systemwide improvements, it is programmatic in nature and does not include policies specific to individual school sites or school district operations (Fresno Council of Governments 2022).

At the county level, the Fresno County Department of Public Works and Planning is currently preparing a Safe Streets for All (SS4A) Action Plan, which reflects a data-driven approach to improving roadway safety throughout unincorporated areas and participating cities. The SS4A Action Plan is intended to identify collision trends, prioritize high-risk locations, and develop both systemwide and location-specific safety improvements to reduce fatalities and serious injuries across the transportation network. The planning framework emphasizes analysis of collision data, identification of contributing factors, and the development of targeted countermeasures and performance metrics to guide future safety investments. The SS4A Action Plan also incorporates community input, including concerns related to speeding, pedestrian and bicycle infrastructure needs, and safety conditions along school travel routes (County of Fresno n.d.)

Fresno COG also administers regional Safe Routes to School (SRTS) funding programs through the Measure C transportation sales tax program, which prioritizes infrastructure improvements that enhance the safety of children walking and bicycling to school. The SRTS program focuses on projects within proximity to school sites, with an emphasis on reducing safety risks, addressing high-collision locations, and improving pedestrian and bicycle connectivity for students. Program goals include enhancing safety for school-related travel, prioritizing schools with demonstrated safety concerns based on data, and ensuring that disadvantaged communities receive equitable access to safe transportation options (Fresno Council of Governments n.d.).

Collectively, these county and regional planning efforts establish a framework that emphasizes data-driven safety analysis, prioritization of high-risk areas, and targeted infrastructure improvements to support safer pedestrian and bicycle travel. While these policies and programs inform long-term planning

and funding priorities, site-specific improvements associated with individual projects would be determined through coordination with the County of Fresno, the City of Fresno (as applicable), and relevant implementing agencies during project design and review.

2.3 City of Fresno

The City of Fresno has adopted a range of plans and policies that guide transportation safety, circulation, and multimodal connectivity within the city. These regulatory and planning documents collectively emphasize a balanced transportation system that accommodates motorists, pedestrians, bicyclists, and transit users, with particular consideration for safety and access in urban environments.

The City's General Plan includes a Mobility and Transportation element that establishes policies and objectives for all modes of travel, including personal vehicles, public transit, and active transportation. The General Plan designates the functional classification of roadways through its Circulation Diagram, which identifies streets as expressways, super arterials, arterials, collector streets, or local streets. These classifications inform roadway design, capacity, and operational characteristics, including considerations related to pedestrian and bicycle travel and safety. The General Plan framework supports a multimodal transportation network intended to provide connectivity and accessibility throughout the city (City of Fresno 2014).

The City of Fresno further supports pedestrian and bicycle travel through its Active Transportation Plan (ATP), adopted in 2026. The ATP establishes a citywide vision to expand and enhance infrastructure that supports walking and bicycling, including sidewalks, crosswalks, and bicycle facilities. The plan identifies existing and planned bikeways, including Class II bicycle lanes along key corridors, and prioritizes improvements that enhance connectivity and safety for non-motorized users. Implementation of the ATP has included the development of new bicycle facilities and upgrades to existing corridors consistent with the City's long-term mobility goals (City of Fresno 2026).

Public transit planning within the City is guided by the Fresno-Clovis Metropolitan Area Short Range Transit Plan (SRTP), prepared by Fresno Area Express (FAX). The SRTP provides a five-year framework for transit service improvements and operational planning within the region. While the SRTP addresses systemwide transit services and priorities, it does not typically include detailed analysis of specific school sites or localized roadway segments unless such facilities are directly affected by proposed transit changes (Fresno Area Express 2025).

The City of Fresno is also advancing a Vision Zero Action Plan, initiated in 2024 and adopted in 2026, which reflects a commitment to reducing and ultimately eliminating traffic-related fatalities and serious injuries. The Vision Zero framework emphasizes a data-driven approach to identifying high-risk locations and prioritizing safety improvements for all roadway users, including pedestrians and bicyclists. The Action Plan is intended to guide implementation of targeted safety enhancements, including engineering improvements, speed management strategies, and other measures designed to improve roadway safety citywide (City of Fresno n.d.).

In addition, the City participates in and supports Safe Routes to School (SRTS) programs, which are multi-agency initiatives aimed at improving safety and accessibility for students traveling to and from school. These programs focus on increasing the safety of walking, bicycling, and transit use among students through infrastructure improvements and complementary strategies. The City of Fresno Safe Routes to School Action Plan (2018) evaluates existing conditions near school sites and identifies infrastructure needs and programmatic strategies to enhance safety and connectivity (Safe Routes to

School National Partnership 2018). SRTS efforts within the City are often funded through Measure C and the State's Active Transportation Program and prioritize improvements in areas with demonstrated safety concerns, including within proximity to K–12 schools.

Collectively, these City of Fresno plans and programs establish a regulatory framework that emphasizes multimodal connectivity, data-driven safety planning, and targeted improvements to support pedestrian and bicycle travel. These policies are directly relevant to the evaluation of existing conditions within the school attendance boundary and provide guidance for potential roadway and infrastructure improvements that could be considered during project design in coordination with the City.

3.0 Study Area

3.1 Norseman Elementary School Attendance Boundary

The attendance boundary for Norseman Elementary School is generally rectangular in shape, extending from Olive Avenue to the south, Sierra Vista Avenue to the east, Cedar Avenue to the west, and Fountain Way to the north. A small exclusion area is present in the northeastern portion of the boundary, omitting the area east of Maple Avenue and north of Princeton Avenue. The school is centrally located within the City of Fresno, and the attendance boundary encompasses approximately 1.14 square miles, including areas within both the City of Fresno and unincorporated Fresno County.

Land uses within the study area are predominantly residential and organized in relatively large block patterns. Commercial, institutional, and light industrial land uses are interspersed throughout the study area, typically concentrated at major intersections or along higher-classification roadways. The southeastern portion of the attendance boundary, generally bounded by Jackson Avenue to the west, Olive Avenue to the south, Sierra Vista Avenue to the east, and McKinley Avenue/Mill Ditch to the north, does not contain residential uses. However, students residing to the west of this area would travel through this area to access Maple Avenue as a primary north route to the school.

Accordingly, all portions of the study area, including non-residential areas, are considered in the evaluation of pedestrian and bicycle connectivity to capture the full range of potential travel routes used by students.

3.2 Roadway Network Overview

The attendance boundary is bisected by State Route 168 (SR-168), which runs in a general north–south direction along the eastern portion of the study area and divides approximately one-third of the boundary. Shields Avenue and Clinton Avenue provide roadway and pedestrian overcrossings of SR-168, while McKinley Avenue provides a roadway and pedestrian undercrossing. Additional dedicated pedestrian overcrossings are located at Weldon Avenue and Princeton Avenue.

The Union Pacific Railroad corridor, located adjacent to Floradora Avenue, extends east–west and separates approximately 15 percent of the southern portion of the attendance boundary. There is one sidewalk crossing of the railroad along the west side of Cedar Avenue.

The roadway network within the attendance boundary consists of a hierarchy of arterial, collector, and local streets. Arterial and collector roadways generally form large, square city blocks throughout the study area. Arterial roadways are characterized by greater widths, higher traffic volumes, and higher posted speed limits. Arterial roadways within the boundary include Shields Avenue, McKinley Avenue, and Cedar Avenue.

Collector roadways serve to distribute traffic between arterial and local streets and typically have moderate travel speeds, traffic volumes, and roadway widths. Collector roadways within the study area include Clinton Avenue, Maple Avenue, and Olive Avenue.

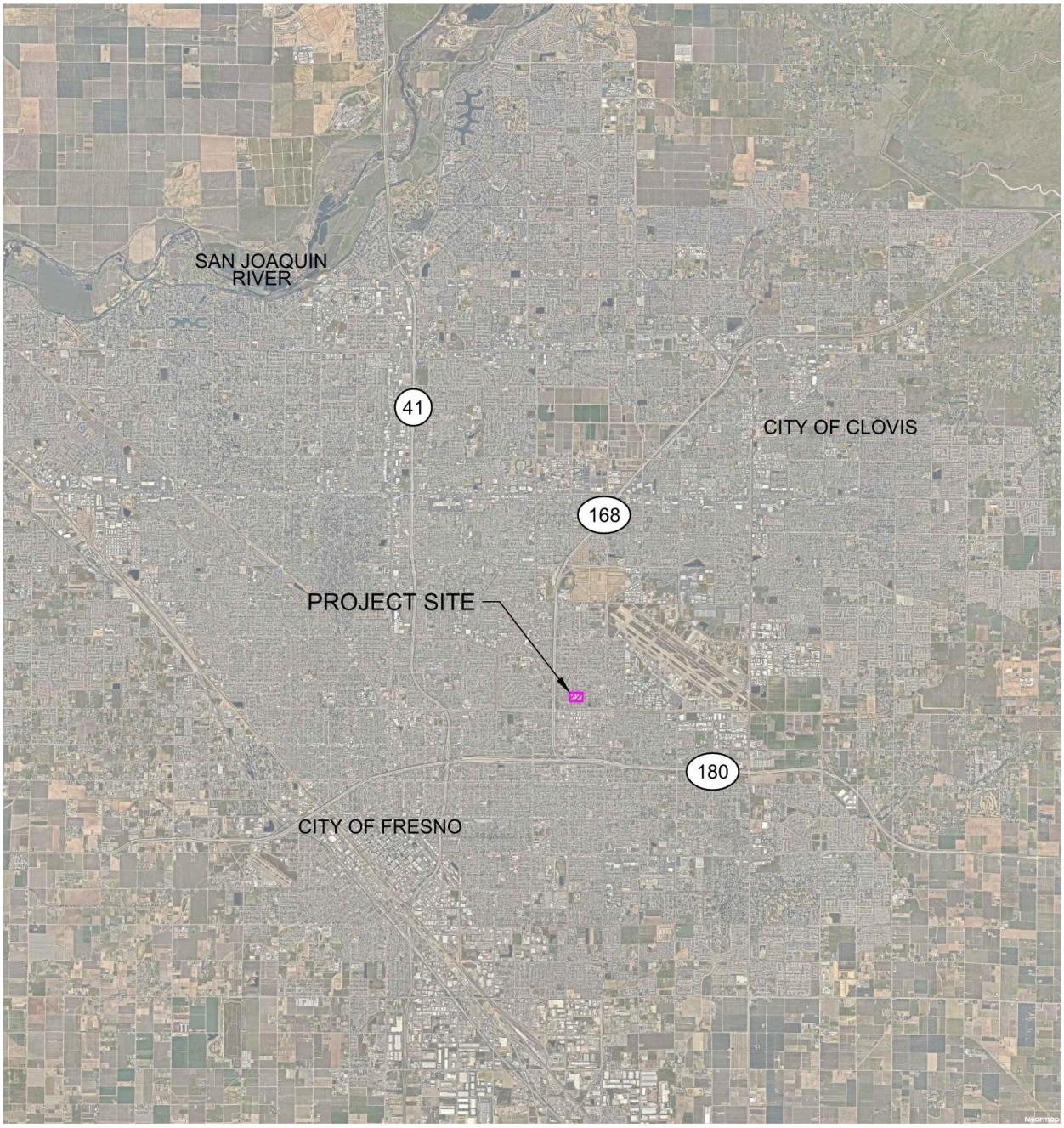
The attendance boundary is generally a tall rectangle. Maple Avenue, which runs north–south near the center of the boundary and along the western frontage of the school site, and functions as a primary north–south corridor for student travel. As such, Maple Avenue is a key route for students accessing the school from various portions of the attendance area.

3.3 Data Sources and Methods

This study analyzes transportation facilities in the Norseman Elementary School attendance boundary (study area) primarily from analyzing high-quality aerial images taken on February 8, 2026, obtained from Nearmaps.com. Obscured or small features not visible from aerial imagery of the study area were verified using Google maps street view. These images are used in Figures 1A, 1B, 2, and 3A through 3D.

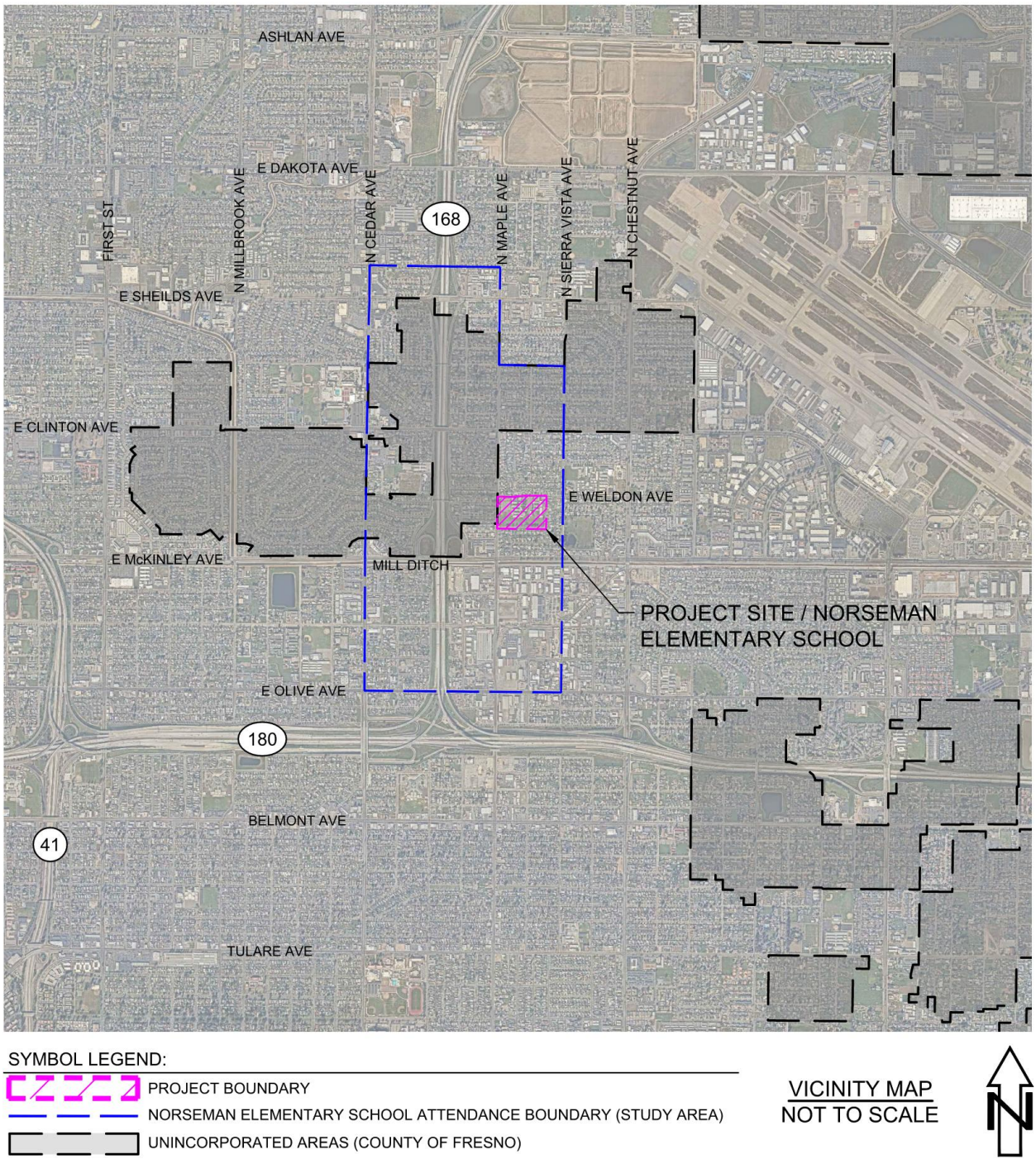
A pedestrian survey was conducted on June 12, 2026 between 8 am and 10 am to supplement analysis of aerial images and provide a general understanding of transportation conditions in the study area. Observations during this survey were modeled after the Safe Route to School National Partnership General Walk Audit Checklist (Safe Routes to School National Partnership 2018). The survey was conducted while school was not in session due to summer recess, therefore vehicle, bicycle, and pedestrian traffic related to school attendance was not observed and represents a “data gap”; however the intent of this study was to evaluate the existing physical environment and the proposed project. Photos showing characteristic and key transportation facilities can be seen in Attachment A.

Figure 1A: Project Location Map



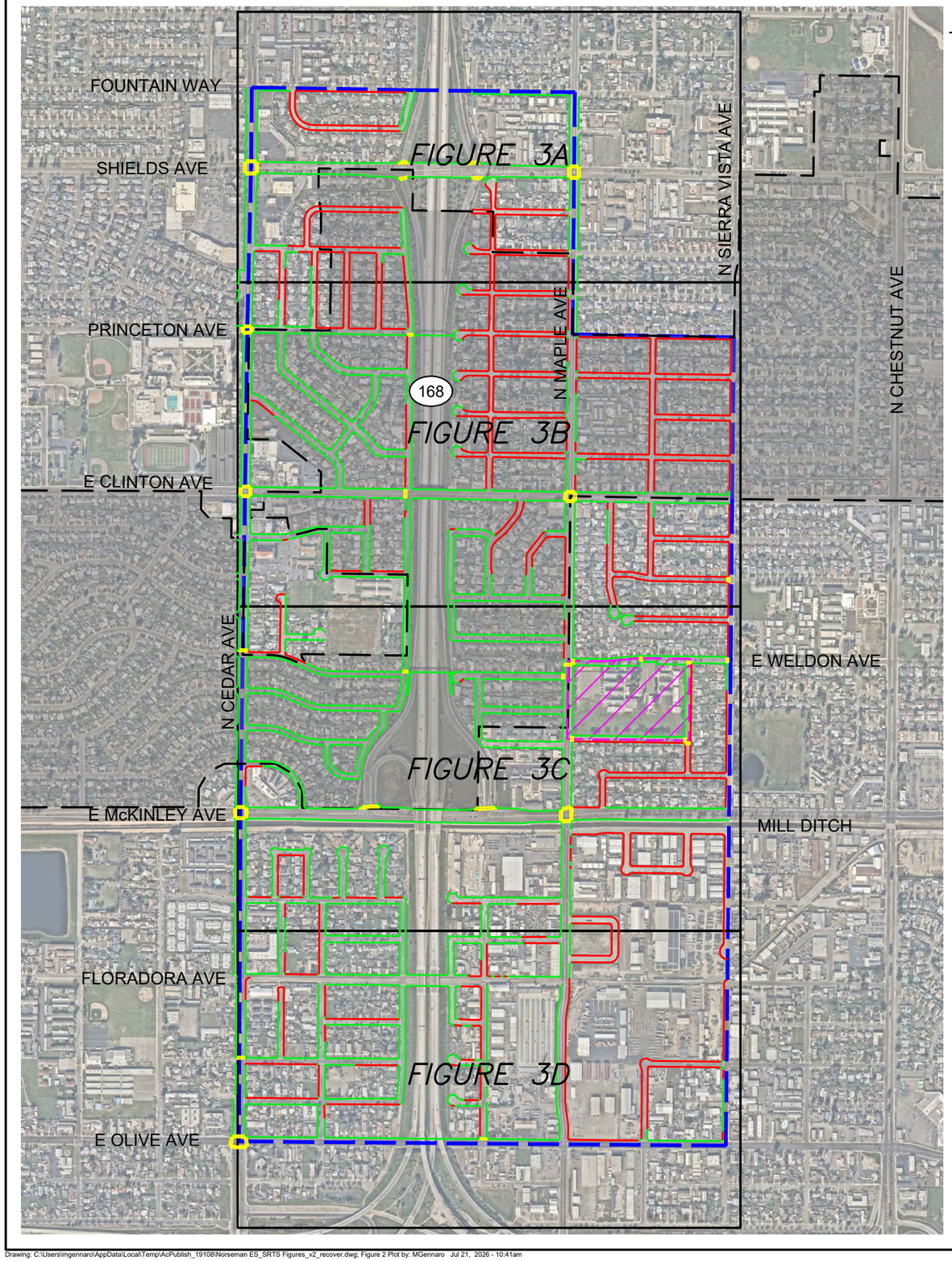
LOCATION MAP
NOT TO SCALE

Figure 1B: Project Vicinity Map



4.0 Existing Conditions

Figures 2, and 3A through 3D below provide a graphical presentation of the presence/absence of concrete sidewalks, the presence of crosswalks, and the presence/type of bike lanes/paths, added over aerial imagery within the study area. Photos showing characteristic and key transportation facilities can be seen in Attachment A. A description of the existing pedestrian and bicycle facilities is provided later in this section.



SYMBOL LEGEND:

- PROJECT SITE / NORSEMAN ELEMENTARY SCHOOL
- NORSEMAN ELEMENTARY SCHOOL ATTENDANCE BOUNDARY
- UNINCORPORATED AREAS (COUNTY OF FRESNO)
- STREET PERIMETER WITH NO SIDEWALK
- EXISTING SIDEWALK
- EXISTING CROSSWALK

N

0 500 1000 2000
SCALE IN FEET

FIGURE 3A
FIGURE 3B
FIGURE 3C
FIGURE 3D

SITE LOCATION: FRESNO, CA

FIGURE: 2

Blair, Church & Flynn CONSULTING ENGINEERS

CONSULTANT
Blair, Church & Flynn Consulting Engineers
460 Clovis Avenue, Suite 200
Clovis, California 93612
Tel (559) 326-1400
Fax (559) 326-1399

FRESNO UNIFIED SCHOOL DISTRICT

NORSEMAN ELEMENTARY SCHOOL ATTENDANCE BOUNDARY

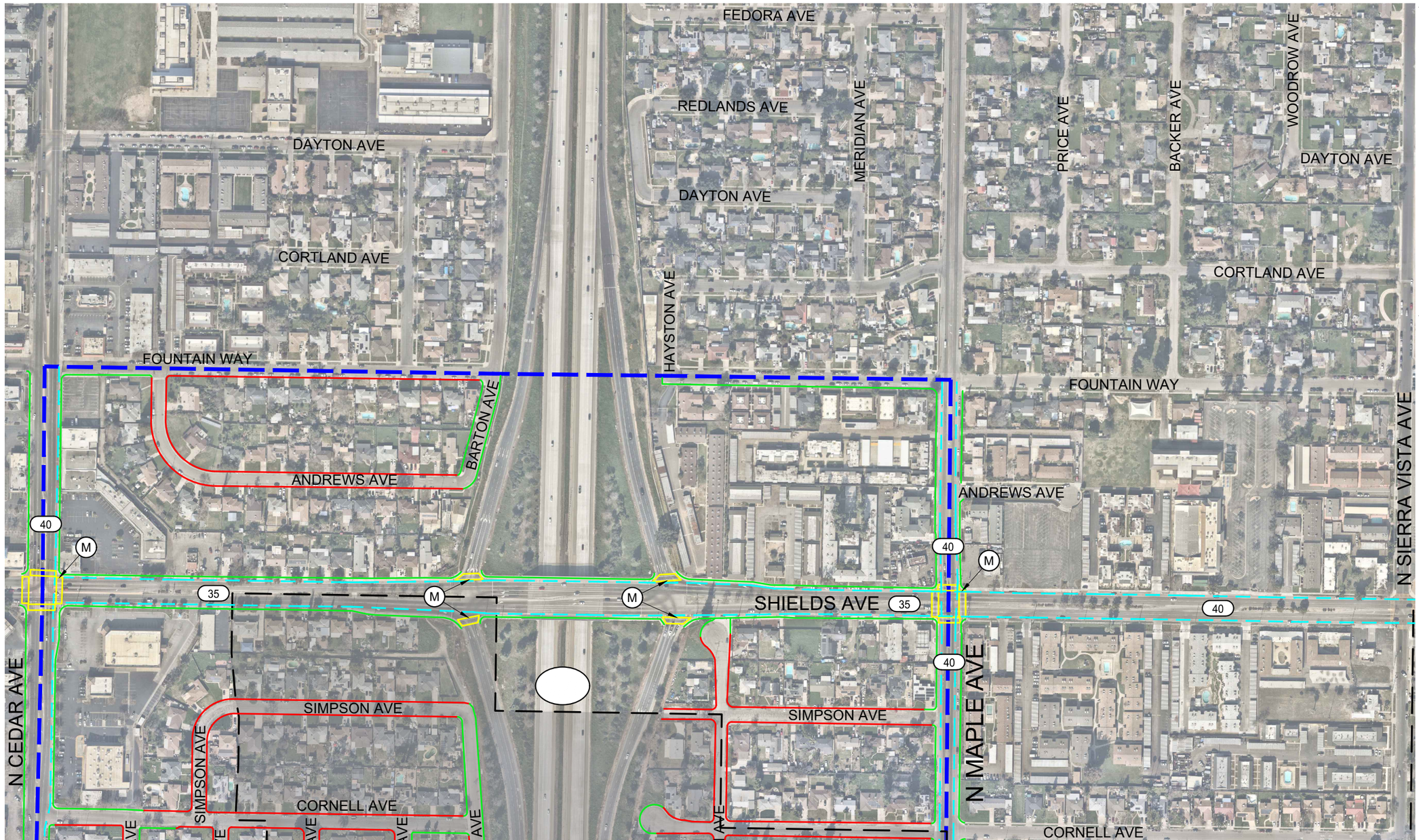
KEY MAP & SIDEWALK/CROSSWALK OVERVIEW MAP

DR. BY MG
CH. BY
DATE 06-15-2026
SCALE: AS NOTED

SHEET NO. 2
OF 6 SHEETS

SAFE ROUTE TO SCHOOL ANALYSIS MAPS

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MATCH LINE - SEE FIGURE 3B

SYMBOL LEGEND:

- NORSEMAN ELEMENTARY SCHOOL ATTENDANCE BOUNDARY
- UNINCORPORATED AREAS (COUNTY OF FRESNO)
- STREET PERIMETER WITH NO SIDEWALK
- EXISTING SIDEWALK
- EXISTING CROSSWALK
- CLASS I - BIKE PATH
- CLASS II - BIKE LANE
- CLASS III - BIKE ROUTE
- (##) SPEED LIMIT

NOTES:

1. CURB RAMPS WHEN CONNECTED TO SIDEWALK ARE COUNTED AS SIDEWALK.
2. CURB RAMPS THAT ARE NOT CONNECTED TO SIDEWALK WERE NOT COUNTED AS SIDEWALK.
3. RESIDENTIAL STREETS WITHOUT SPEED LIMIT INDICATOR HAVE A SPEED LIMIT OF 25 MPH
4. CROSSWALK TYPE IS INDICATED BY:
   M = MARKED (STADARD)
   S = SCHOOL (YELLOW)
   H = HIGH-VISIBILIY (WHITE AND YELLOW)

FIGURE 3A
FIGURE 3B
FIGURE 3C
FIGURE 3D

N

0 100 200 300 600
SCALE IN FEET

SITE LOCATION: FRESNO, CA

FIGURE: 3A

Blair, Church & Flynn CONSULTING ENGINEERS

CONSULTANT
Blair, Church & Flynn Consulting Engineers
400 Clovis Avenue, Suite 200
Clovis, California 93612
Tel (559) 326-1400
Fax (559) 326-1500

FRESNO UNIFIED SCHOOL DISTRICT

NORSEMAN ELEMENTARY SCHOOL ATTENDANCE BOUNDARY

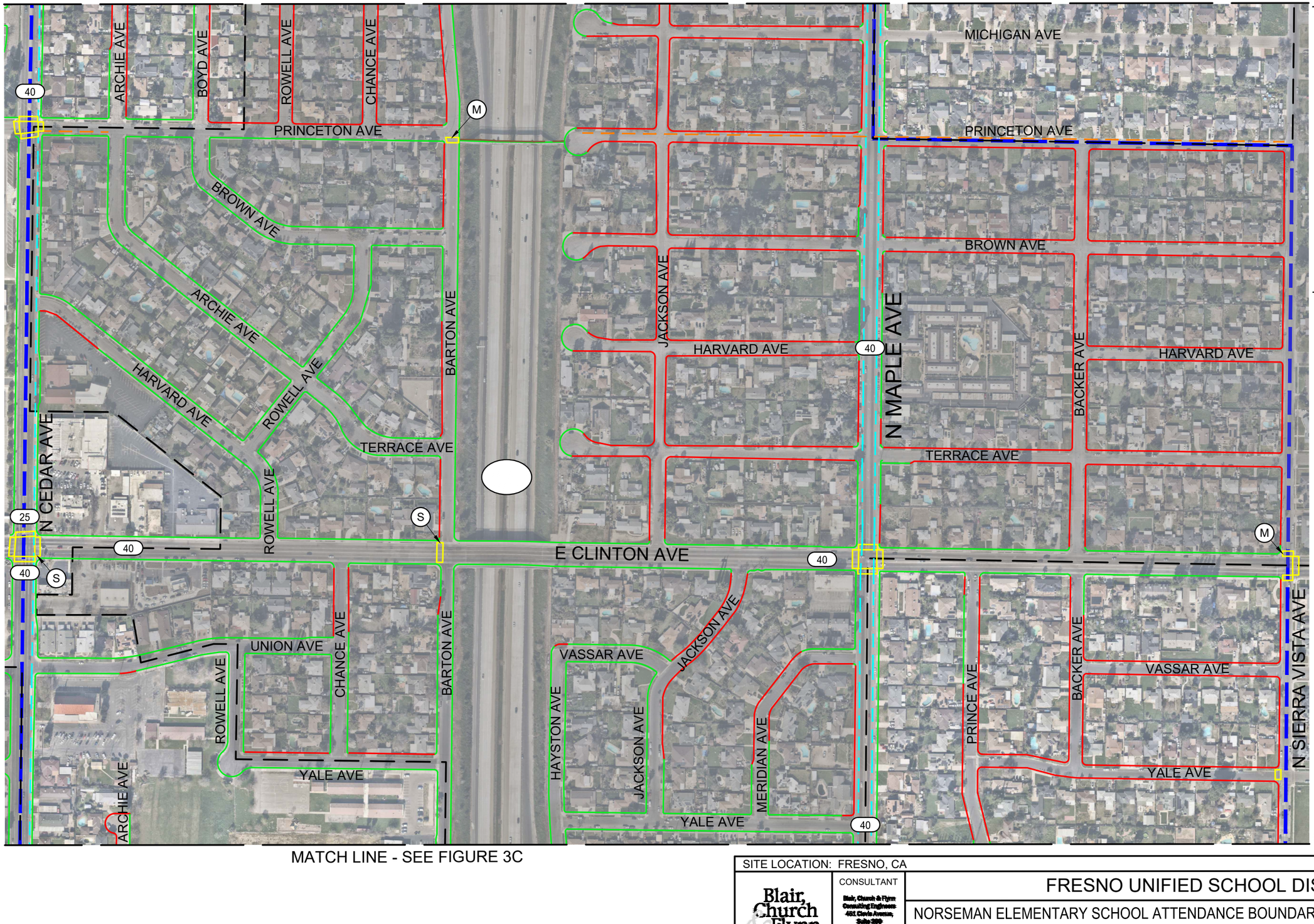
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CH. BY
DATE 06-15-2026
SCALE: AS NOTED

SHEET NO. 3
OF 6 SHEETS

SAFE ROUTES TO SCHOOL & WALK AUDITS MAPS

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MATCH LINE - SEE FIGURE 3A



MATCH LINE - SEE FIGURE 3C

SYMBOL LEGEND:

- NORSEMAN ELEMENTARY SCHOOL ATTENDANCE BOUNDARY
- UNINCORPORATED AREAS (COUNTY OF FRESNO)
- STREET PERIMETER WITH NO SIDEWALK
- EXISTING SIDEWALK
- EXISTING CROSSWALK
- CLASS I - BIKE PATH
- CLASS II - BIKE LANE
- CLASS III - BIKE ROUTE
- ## SPEED LIMIT

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   S = SCHOOL (YELLOW)
   H = HIGH-VISIBILIY (WHITE AND YELLOW)

FIGURE 3A
FIGURE 3B
FIGURE 3C
FIGURE 3D

0 100 200 300 600
SCALE IN FEET

SITE LOCATION: FRESNO, CA | FIGURE: 3B

Blair, Church & Flynn CONSULTING ENGINEERS

CONSULTANT
Blair, Church & Flynn Consulting Engineers
4821 Clovis Avenue, Suite 200
Clovis, California 93612
Tel (559) 325-1400
Fax (559) 325-1500

FRESNO UNIFIED SCHOOL DISTRICT

NORSEMAN ELEMENTARY SCHOOL ATTENDANCE BOUNDARY

PARTIAL SIDEWALK, CROSSWALK & BIKE LANE MAP

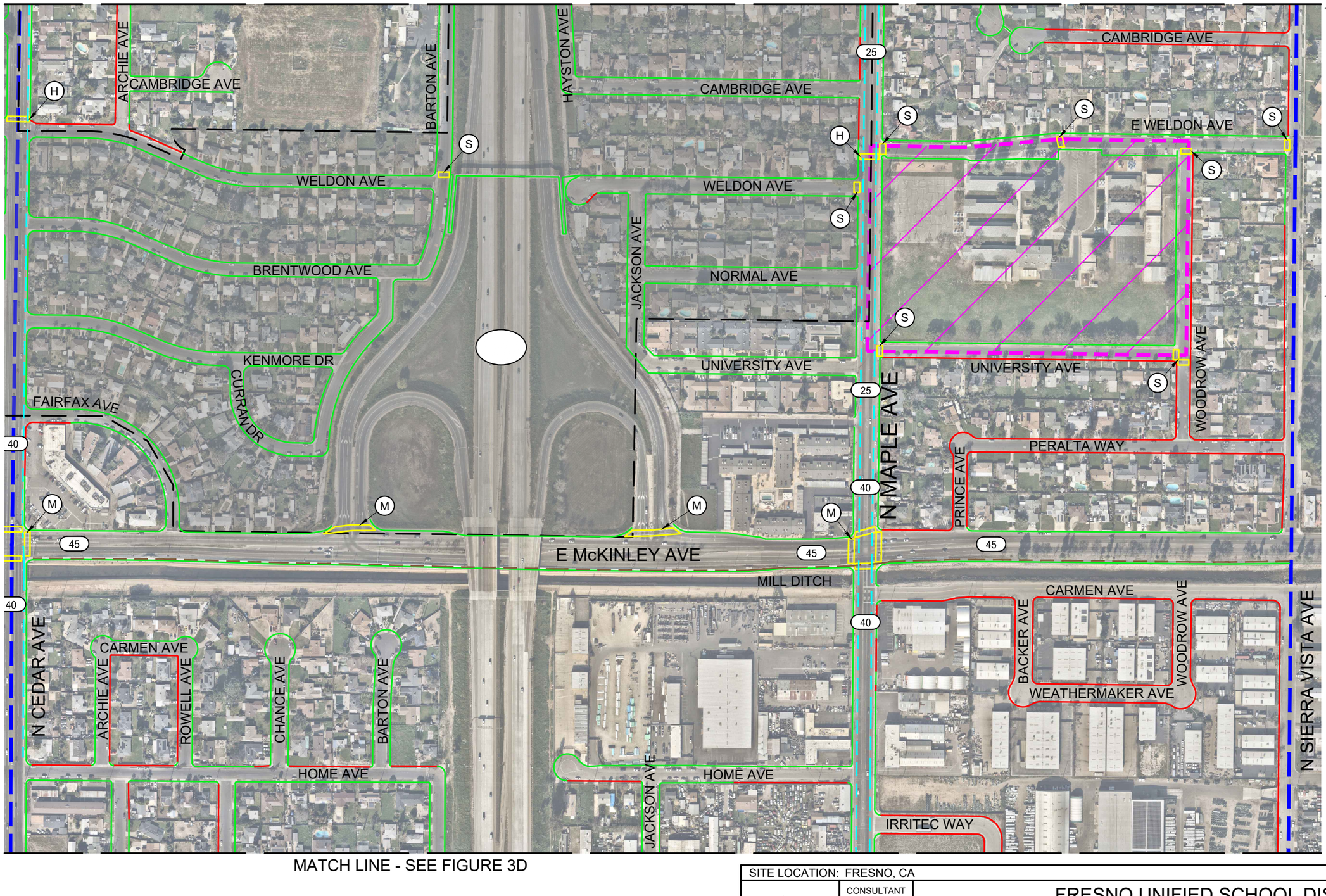
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DATE 06-15-2026
SCALE: AS NOTED

SHEET NO. 4
OF 6 SHEETS

SAFE ROUTE TO SCHOOL ANALYSIS MAPS

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MATCH LINE - SEE FIGURE 3B



MATCH LINE - SEE FIGURE 3D

SYMBOL LEGEND:

- NORSEMAN ELEMENTARY SCHOOL ATTENDANCE BOUNDARY
- UNINCORPORATED AREAS (COUNTY OF FRESNO)
- STREET PERIMETER WITH NO SIDEWALK
- EXISTING SIDEWALK
- EXISTING CROSSWALK
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- CLASS II - BIKE LANE
- CLASS III - BIKE ROUTE
- ## SPEED LIMIT

NOTES:

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   S = SCHOOL (YELLOW)
   H = HIGH-VISIBILIY (WHITE AND YELLOW)

FIGURE 3A
FIGURE 3B
FIGURE 3C
FIGURE 3D

0 100 200 300 600
SCALE IN FEET

SAFE ROUTE TO SCHOOL ANALYSIS MAPS

SITE LOCATION: FRESNO, CA

FIGURE: 3C

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Blair, Church & Flynn CONSULTING ENGINEERS

Blair, Church & Flynn Consulting Engineers
400 Clovis Avenue, Suite 200
Clovis, California 93612
Tel (559) 326-1400
Fax (559) 326-1500

FRESNO UNIFIED SCHOOL DISTRICT

NORSEMAN ELEMENTARY SCHOOL ATTENDANCE BOUNDARY

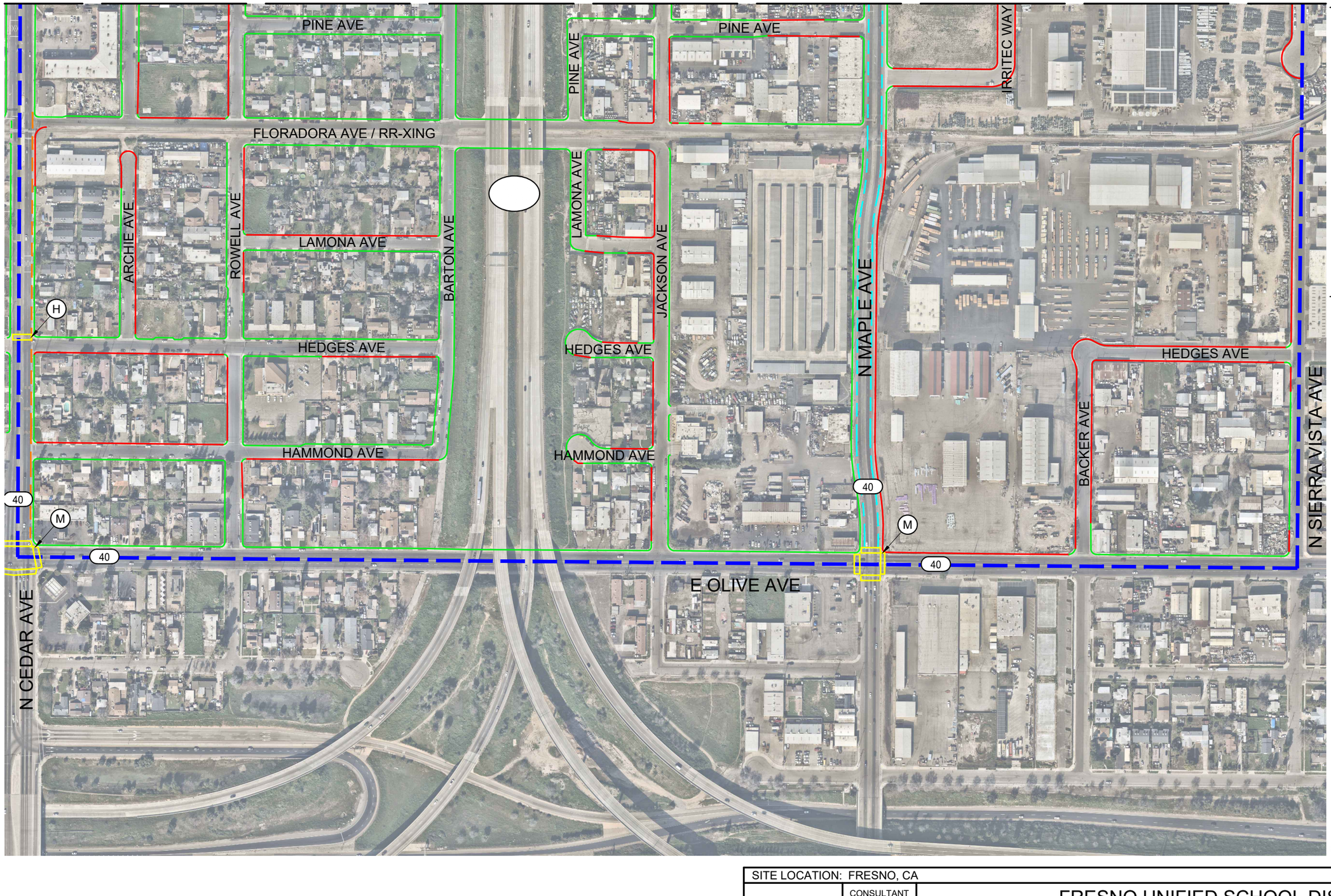
PARTIAL SIDEWALK, CROSSWALK & BIKE LANE MAP

DR. BY MG
CH. BY
DATE 06-15-2026
SCALE: AS NOTED

SHEET NO. 5
OF 6 SHEETS

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MATCH LINE - SEE FIGURE 3C



SYMBOL LEGEND:

- NORSEMAN ELEMENTARY SCHOOL ATTENDANCE BOUNDARY
- UNINCORPORATED AREAS (COUNTY OF FRESNO)
- STREET PERIMETER WITH NO SIDEWALK
- EXISTING SIDEWALK
- EXISTING CROSSWALK
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- CLASS II - BIKE LANE
- CLASS III - BIKE ROUTE
- ## SPEED LIMIT

NOTES:

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FIGURE 3A
FIGURE 3B
FIGURE 3C
FIGURE 3D

N

0 100 200 300 600
SCALE IN FEET

SITE LOCATION: FRESNO, CA | FIGURE: 3D

Blair, Church & Flynn CONSULTING ENGINEERS

CONSULTANT
Blair, Church & Flynn Consulting Engineers
4421 Clovis Avenue, Suite 200
Clovis, California 93612
Tel (559) 326-1400
Fax (559) 326-1399

FRESNO UNIFIED SCHOOL DISTRICT

NORSEMAN ELEMENTARY SCHOOL ATTENDANCE BOUNDARY

PARTIAL SIDEWALK, CROSSWALK & BIKE LANE MAP

DR. BY MG
CH. BY
DATE 06-15-2026
SCALE: AS NOTED

SHEET NO. 6
OF 6 SHEETS

SAFE ROUTE TO SCHOOL ANALYSIS MAPS

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4.1 Roadway Characteristics

Existing roadway characteristics within the study area influence the safety and comfort of students walking and bicycling to school. Key factors include vehicle speeds, traffic volumes, roadway width, and the presence of on-street parking.

Arterial and collector roadways generally have the highest posted speed limits and traffic volumes in the study area. Posted speeds range from 35 to 45 miles per hour (mph) and are summarized in Table 1.

Table 1: Arterial and Collector Roadway Characteristics

Road Name	Designation	Posted Speed Limit	Traffic Volumes	Road Width (in lanes)	Roadside Parking?
Shields Avenue	Arterial	35 MPH	High	4, with median	No
Clinton Avenue	Collector	40 MPH	Moderate to High	4	Yes
McKinley Avenue	Arterial	45 MPH	High	4 to 5, with median	Yes (north side)
Olive Avenue	Collector	40 MPH	Moderate to High	4	Yes
Cedar Avenue	Arterial	40 MPH	High	5	No
Maple Avenue	Collector	40 MPH	Moderate to High	3 to 5	Yes

Arterial and collector roadways in the study area are typically configured with multiple travel lanes (commonly five lanes, including a center two-way left-turn lane), resulting in wider roadway cross-sections and longer pedestrian crossing distances. These characteristics can increase exposure for pedestrians and bicyclists, particularly where marked crossing opportunities are limited.

Speed limits on local residential streets are generally not posted. In accordance with the California Vehicle Code, unposted residential roadways default to a speed limit of 25 mph. Local streets in the study area typically experience low to moderately low traffic volumes and are generally four lanes wide, with either a paved shoulder for on-street parking or an unpaved shoulder informally used for on-street parking (only found in county jurisdiction areas).

While lower speeds and traffic volumes on local streets generally support walking and bicycling, these roadways in the study area often feature long block lengths, limited traffic calming measures (except near the school and the two crosswalks leading to the SR-168 overpasses), inconsistent sidewalk infrastructure, and a lack of dedicated bicycle facilities, which collectively reduce comfort and connectivity for students. The combination of no or discontinuous sidewalk and frequent on-street parking along local roads also causes pedestrians and cyclists to travel closer to vehicle traffic.

4.2 Sidewalk Network

Sidewalk connectivity within the study area is variable, with gaps more prevalent in areas farther from the school site and within portions of the County jurisdiction. In several locations, discontinuities in the sidewalk network limit the availability of continuous pedestrian routes to the school. The following trends characterize sidewalk conditions within the study area:

1. **Arterial and Collector Roadways**
   All east–west arterial and collector roadways provide continuous sidewalks, generally supporting east–west pedestrian travel across the study area.

2. **Maple Avenue Corridor**
   Maple Avenue, the primary north–south travel corridor serving the school, has inconsistent sidewalk coverage within both City and County jurisdictions, resulting in gaps along a key student travel route.

3. **School Vicinity**
   Continuous sidewalks are present along the perimeter of the school, as well as on the opposite sides of Weldon and Maple Avenues. The school vicinity is also supported by well-marked crosswalks and traffic-calming features, which enhance pedestrian safety in the area surrounding the school, as discussed later in this document.

4. **Barton Avenue Corridor**
   Barton Avenue, which runs in discontinuous segments immediately west of SR-168, forms a generally continuous north–south route for students traveling from areas west of the highway. Segments of Barton Avenue connect to SR-168 crossings via paved pedestrian overcrossings and shared-use undercrossing.

5. **Overall Sidewalk Coverage**
   Approximately 60 percent of streets within City and County jurisdictions include sidewalks; however, the distribution of sidewalks differs between these areas.

   In City jurisdictions, sidewalks are generally interspersed throughout the street network, resulting in a more evenly mixed pattern of streets with and without sidewalks across most areas. In contrast, County jurisdictions tend to exhibit a more uniform pattern at the community level, with some areas having complete or nearly complete sidewalk networks and other areas having little to no sidewalk infrastructure

6. **Areas with Limited or No Sidewalks**
   Several residential areas, primarily within County jurisdiction, have little to no sidewalk infrastructure, largely due to the absence of dedicated sidewalk right-of-way. These areas include:
   a) Shields Avenue (north), SR-168 (west), Maple Avenue (east), and Clinton Avenue (south)
   b) Princeton Avenue (north), Maple Avenue (west), Sierra Vista Avenue (east), and Cambridge Avenue (south)
   c) Fountain Way (north), Cedar Avenue (west), Barton Avenue (east), and Princeton Avenue (south)

7. **Areas with High Sidewalk Connectivity**
   Some neighborhoods in both City and County jurisdictions exhibit relatively complete sidewalk networks, including:
   a) Clinton Avenue (north), Cedar Avenue (west), Maple Avenue (east), and McKinley Avenue (south)
   b) Princeton Avenue (north), Cedar Avenue (west), Barton Avenue (east), and Clinton Avenue (south)

8. **Southwest Residential Area**
   The residential area located south of McKinley Avenue and west of Jackson Avenue has sidewalks on approximately 50 percent of local streets. Despite this limited coverage, a near-continuous path of travel to the school is available from most homes by frequently crossing local roads, although some routes contain sidewalk gaps. Based on 2025–26 FUSD student address data, 49 residences in this area have one or more students attending the school, representing approximately 20 percent of the 249 student residences attending the school. However, major linear barriers, including SR-168, the Mill Ditch, and the railroad corridor, as well as associated safety concerns result in inconvenient, circuitous travel routes and contribute to perceptions that the area is unsafe for pedestrians, as discussed further in later sections.

9. **Southeast Industrial Area**
   The area located south of McKinley Avenue and east of Jackson Avenue consists primarily of industrial land uses and does not include residential properties from which students would originate. As such, pedestrian activity in this area is primarily associated with through movements rather than trip origins. For students residing south of McKinley Avenue and west of this area, travel through portions of this industrial zone may represent the most direct route to Maple Avenue, which functions as a primary north–south corridor to the school. Students generally do not need to travel through areas east of Maple Avenue and south of McKinley Avenue; therefore, sidewalk conditions in those portions of the study area are less relevant to school access.

   Sidewalk along relevant routes to school in this region is approximately 80% present, with some gaps on one side of the street that are less impactful, but some key gaps in sidewalk connectivity. Crossing the road or taking slightly circuitous routes generally allows for a continuous sidewalk route to school, however, like with the southwest residential area, linear barriers (SR-168, Mill Ditch, and the railroad) and safety risks in this region lead to inconvenient circuitous routes and feelings of this region being unsafe for pedestrians, discussed further in later sections.

10. **Sporadic Sidewalk Impediments**
    During the pedestrian survey of the study area, various sidewalk impediments were observed including overgrown landscaping from neighboring private properties encroaching onto the sidewalk creating a tripping hazard or partially blocking a route, cracked/raised sidewalk creating a tripping hazard, cars parked within the sidewalk portion of a driveway curb ramp blocking a route, and utility infrastructure in the sidewalk blocking a path of travel, especially for areas of narrow sidewalk (frequently observed along Barton Avenue as well as other areas).

4.3 Crosswalk Facilities and Traffic Safety Features

The following describes crosswalk and related traffic safety features facilities within the study area. Crosswalk are present at all major signalized intersections, present thoroughly around the vicinity of the school, and sparsely located at the intersections of local roads and other roads:

1. **Signalized Intersections on Arterial and Collector Roadways**
   Signalized intersections along arterial and collector roadways generally include marked crosswalks on all approaches. Many of these crossings span roadways of approximately four lanes in width, resulting in relatively long pedestrian crossing distances.

2. **SR-168 Ramp Intersections**
   All on- and off-ramp intersections along SR-168 are equipped with signalized crosswalks and pedestrian push-button actuators, facilitating controlled crossings at highway access points.

3. **Pedestrian Overpass Crossings (SR-168)**
   Marked crosswalks are provided at the access points to the dedicated pedestrian overcrossings of SR-168 at Princeton Avenue and Weldon Avenue. These crossings are supplemented with school-related warning signage and pavement legends (e.g., “SLOW SCHOOL XING”) to enhance driver awareness.

4. **School Vicinity Crosswalks and Traffic Calming Features**
   A total of nine marked crosswalks are located within the immediate vicinity of the school. Key features include:
   a) **Maple Avenue Frontage**
      Maple Avenue, a primary higher-speed roadway adjacent to the school, includes a high-visibility crosswalk, school warning signage, and a 25 mph speed zone with flashing beacons.
   b) **Weldon Avenue School Frontage**
      Weldon Avenue provides primary access to the school and includes a midblock crosswalk connecting directly to the school entrance. This crossing is supported by traffic calming and safety features, including speed humps, pavement markings (“SLOW SCHOOL XING”), school warning signage, reduced speed limit signage (10 mph), and no U-turn signage.
   c) **Local Street Intersections**
      Intersections along local streets surrounding the school are generally equipped with standard marked crosswalks.

5. **Limited Crosswalks at Local-to-Arterial/Collector Intersections**
   Outside of the immediate school vicinity, most intersections between local streets and arterial or collector roadways lack marked crosswalks. Exceptions are limited and occur at select locations, including:
   a) Weldon Avenue and Sierra Vista Avenue
   b) Cedar Avenue and Hedges Avenue
   c) Olive Avenue and Jackson Avenue
   d) Cedar Avenue and Weldon Avenue
   e) Barton Avenue and Clinton Avenue

6. **Floradora Avenue Absence**
   There is a lack of designated pedestrian crossings of Floradora Avenue/the railroad, where the only designated crossing is the west side of Cedar Avenue. Connectivity and routes are already limited in this region due to the combination of multiple linear barriers, as discussed in Section 4.5.

4.4 Bicycle Facilities

The following describes existing bicycle facilities within the study area. Bicycle infrastructure is generally distributed along arterial and collector roadways, with some connectivity provided by select local streets. These facilities provide access to the school for many areas within the attendance boundary; however, gaps remain in key locations.

1. **Maple Avenue Corridor**
   Continuous Class II bicycle lanes are provided on both sides of Maple Avenue, forming the primary north–south bicycle route directly to school.

2. **Shields Avenue Corridor**
   Continuous Class II bicycle lanes are provided on both sides of Shields Avenue, offering an east–west connection to Maple Avenue for a small portion of the northern study area.

3. **McKinley Avenue / Mill Ditch Corridor**
   A continuous Class I multi-use path runs along McKinley Avenue and the Mill Ditch, providing a dedicated east–west bicycle route across the southern portion of the attendance boundary.

4. **Cedar Avenue Corridor**
   A nearly continuous Class II bicycle lane is provided along the east side of Cedar Avenue, serving as a primary north–south route for students located east of SR-168 to access east–west bicycle facilities.

   a. The Class II facility is continuous from Fountain Way to Home Avenue.
   b. A gap of approximately 640 feet exists between Home Avenue and Floradora Avenue.
   c. South of this gap, a Class III bicycle route resumes at Floradora Avenue and continues to the southern boundary at Olive Avenue.

5. **Princeton Avenue Corridor**
   A nearly continuous Class I bicycle route along Princeton Avenue provides a key east–west connection in the northern portion of the study area, however there are no physical features that distinguish this bicycle route from any other local road, other than a sign indicating a bicycle route at the two intersections of Cedar and Princeton Avenues and Maple and Princeton Avenues. This route utilizes the dedicated pedestrian overcrossing to cross SR-168.

6. **Weldon Avenue (Local Route)**
   While Weldon Avenue does not include designated bicycle facilities, it functions as a low-volume local street that provides a direct east–west connection to the school. Students traveling from

central areas and from east of SR-168 can use this corridor in conjunction with the pedestrian overcrossing, similar to Princeton Avenue.

7. **Local Street Network**
   Most local residential streets have relatively low traffic volumes and posted speed limits of 25 mph, allowing cyclists to travel to designated bicycle facilities via neighborhood streets.

8. **Clinton Avenue Bicycle Network Gap**
   No dedicated bicycle facilities are provided along Clinton Avenue, which functions as a primary east–west collector roadway north of the campus. As currently designed, the road width, lane markings, and presence of on-street parking makes this route not suitable for bicyclists. However, parallel east–west corridors, including Shields Avenue, Princeton Avenue, and Weldon Avenue, provide alternative bicycle routes that connect to the north–south Maple Avenue corridor or directly to the school.

9. **Barton Avenue Gap**
   No bicycle facilities are provided along Barton Avenue, despite its role as a north–south corridor west of SR-168.
   - **a.** This absence limits north–south bicycle connectivity in this portion of the study area.
   - **b.** As a result, Cedar Avenue is effectively the only continuous north–south route with bicycle facilities east of SR-168, though its location along the study area perimeter reduces its practicality for many students.
   - **c.** In addition, long, uninterrupted segments of Barton Avenue without clearly posted speed limits may encourage higher vehicle speeds, which can further discourage bicycle use.

4.5 Barriers and Hazards

The following describes existing barriers and hazards in the study area. The study area includes three major linear barriers: State Route 168 (SR-168), the Mill Ditch (along the south of McKinley Avenue), and the Union Pacific railroad (which has two parallel sides of Floradora Avenue on both sides). These three linear barriers all occur together in the southern third of the study area, while the northern two thirds of the study area only has SR-168.

Hazards within the study area include loiterers/homeless encampments, loose/stray dogs, tripping hazards (damaged sidewalk, unpaved routes, railroad tracks, overgrown landscaping),

1. **State Route 168**
   SR-168 bisects approximately one-third of the study area along the eastern portion, creating a substantial linear barrier to east–west travel.

   a. **Crossing Opportunities**
      Crossings are provided at limited locations, including:
      - **i.** Shields Avenue and Clinton Avenue (combined pedestrian/vehicle overcrossings)
      - **ii.** Princeton Avenue and Weldon Avenue (dedicated pedestrian overcrossings)

iii. McKinley Avenue, Floradora Avenue, and Olive Avenue (undercrossings)

b. Safety Conditions
Undercrossings, exhibit conditions that may reduce perceived safety, including limited visibility and the presence of transients. These concerns are generally less pronounced at overcrossings.

c. Adjacent Corridors
The SR-168 corridor includes extensive open and undeveloped right-of-way areas, which, in combination with nearby features such as the Mill Ditch and the Union Pacific rail corridor along Floradora Avenue, contribute to loitering and reduced perceived safety along adjacent routes.

2. Mill Ditch
The Mill Ditch bisects approximately one-third of the study area in the southern portion, forming an additional east–west barrier.

a. Crossing Opportunities
Crossings are limited to roadway bridges at Cedar Avenue and Maple Avenue. The barrier of SR-168 creates a crossing connectivity gap within the center of the study area, leading to circuitous paths of travel for residents south of the Mill Ditch/McKinley Avenue and east of SR-168.

b. Safety Conditions
The Mill Ditch corridor includes open space, accessible bridge undercrossings, and seasonal water, all of which attract loitering and reduce perceived safety for pedestrians.

3. Union Pacific Rail Corridor (Floradora Avenue)
The Union Pacific rail line adjacent to Floradora Avenue bisects approximately 15 percent of the southern study area. The corridor is a formerly used industrial spur but is not formally abandoned. The rail alignment is embedded within the roadway corridor, creating a unique condition where the railroad and roadway run parallel within the same right-of-way.

This corridor presents multiple safety and accessibility concerns, including uneven surfaces, tripping hazards, and constrained pedestrian infrastructure. In addition, the corridor attracts loitering, which reduces perceived safety.

a) Cedar Avenue Crossing
There is only one formal sidewalk crossing provided along Cedar Avenue, just outside the eastern boundary of the study area. While this represents the safest designated crossing, it lacks crosswalk markings and its location is not convenient for many residents and increases travel distance.

b) Maple Avenue Crossing
Maple Avenue provides a partial crossing opportunity. While the route approaching the intersection includes sidewalk, there is no sidewalk through the rail crossing or crosswalk markings, reducing overall safety and accessibility.

c) Barton Avenue Crossing
Barton Avenue provides one of three vehicular crossings of the Floradora

Avenue/railroad barrier and includes continuous asphalt pavement across the tracks at a four-way stop intersection. While vehicles can fully traverse the crossing, the intersection lacks marked crosswalks and defined pedestrian crossing areas, reducing visibility of pedestrians to drivers and increasing potential vehicle–pedestrian conflicts. Use of this crossing also requires travel through the SR-168 underpass along Floradora Avenue, which presents additional safety concerns. Together, these conditions make this route less safe and less desirable for students traveling to school.

d) Non-designated Crossings

Several local streets, including Archie Avenue, Rowell Avenue, Lamona Avenue/Pine Avenue, and Jackson Avenue, do not include paved crossings. However, these locations are physically passable and may be used as non-designated crossings, which present safety risks due to uneven surfaces and lack of designated pedestrian infrastructure.

e) Bicycle Conditions

A Class II bicycle lane along Maple Avenue provides a defined north–south route across the corridor; however, the crossing environment remains constrained by the same surface and visibility limitations affecting pedestrians.

f) Future Considerations

Although currently inactive, the corridor may be reactivated for rail use in the future, which would introduce additional safety considerations at crossing locations.

4. Loose Dogs

During field observations, loose dogs were identified in several areas, particularly south of McKinley Avenue. Some animals appeared to originate from residential properties without fencing or restraint, while others appeared to be strays. The presence of loose dogs pose a safety concern for students walking or bicycling.

5. Combined Barrier Effects (Southeast Area Isolation)

The combined effect of SR-168, the Mill Ditch, and the Floradora Avenue/Union Pacific rail corridor significantly constrains connectivity for areas south of the Mill Ditch/McKinley Avenue.

Limited crossing opportunities, incomplete sidewalk and bicycle networks, and multiple perceived safety concerns (including high rates of observed vagrant encampments presence of loose animals) reduce the availability of direct and comfortable routes to the school. As a result, the most continuous routes available to many students in this area are indirect and require substantial out-of-direction travel, reducing the practicality of walking and bicycling.

6. Vehicle Traffic

Vehicle traffic represents a primary source of risk to pedestrians and bicyclists within urban environments, particularly along higher-speed, multi-lane roadways and in areas with incomplete pedestrian and bicycle infrastructure. While traffic collision analysis is not a primary focus of this report, regional data is provided for context to highlight the types and magnitude of risks faced by vulnerable road users within the City of Fresno.

Recent data illustrate the scale of this issue. Between January and August 2025, the City of Fresno recorded approximately 2,487 total collisions, including 168 incidents involving

pedestrians (resulting in 15 fatalities) and 106 incidents involving bicyclists (resulting in two fatalities) (Thompson 2025).

Over a longer timeframe, local data further demonstrate the disproportionate impact of traffic collisions on vulnerable road users. Between 2019 and 2023, pedestrians and bicyclists accounted for approximately 14 percent and 7 percent of all injury crashes, respectively, but represented a substantially higher share of severe outcomes, comprising approximately 36 percent and 9 percent of all fatal and serious injury crashes, respectively (DKS Associates 2025). This disparity reflects the increased vulnerability of pedestrians and bicyclists, who lack the physical protection afforded to vehicle occupants.

This elevated risk is often compounded by roadway design characteristics commonly found in urban environments, including wider roadway cross-sections, higher operating speeds, and longer crossing distances. These conditions increase both the likelihood of vehicle–pedestrian and vehicle–bicyclist conflicts and the severity of outcomes when collisions occur.

Driver behavior also plays a significant role in collision risk. The City of Fresno Vision Zero analysis identified unsafe speed (20 percent), failure to yield the right-of-way (18 percent), and traffic control device violations (18 percent) as the most common primary contributing factors in collisions between 2019 and 2023 (DKS Associates 2025). These factors are closely associated with conditions where pedestrian and bicycle infrastructure is limited, visibility is constrained, or crossing locations are not clearly defined.

The built environment can either mitigate or amplify these risks. The absence of marked crosswalks reduces pedestrian visibility and may lead to unpredictable crossing behavior, increasing the likelihood of conflicts with vehicles. Similarly, gaps in sidewalk infrastructure can result in pedestrians traveling within the roadway or along unprotected shoulders, placing them in closer proximity to vehicle traffic.

The interaction between limited pedestrian infrastructure and on-street parking can further exacerbate safety concerns. Parked vehicles adjacent to travel lanes may obstruct sight lines between drivers and pedestrians, particularly at intersections and driveways, creating “hidden” conflict points. These conditions can be especially challenging for children and other vulnerable populations, who may be less visible to approaching drivers and may have more difficulty assessing traffic conditions.

Bicycle safety is similarly influenced by the presence or absence of dedicated facilities. Where bicycle lanes or separated facilities are not provided, bicyclists must share travel lanes with motor vehicles, increasing exposure to traffic and conflicts with higher-speed vehicles. Discontinuous facilities or abrupt transitions between facility types may further reduce predictability for both bicyclists and drivers.

In combination, these factors including traffic volumes and speeds, driver behavior, infrastructure continuity, and roadway design contribute to the overall level of risk experienced by pedestrians and bicyclists. Addressing these conditions through a coordinated approach incorporating engineering, education, and enforcement is widely recognized as an effective means of improving safety outcomes.

4.6 Connectivity Assessment

Overall, pedestrian and bicycle connectivity within the study area is mixed, with generally functional regional corridors but notable gaps that limit safe and direct access to the school for some students.

Pedestrian connectivity is incomplete and inconsistent. Sidewalks are typically present along arterial and collector roadways, but only about 60 percent of streets include sidewalks, with sidewalk particularly lacking along local roads, within County jurisdiction, and south of McKinley Avenue within City jurisdiction. Gaps along key routes, including Maple Avenue, and the lack of marked crosswalks at many local-to-arterial/collector intersections reduce visibility, break route continuity, and weaken otherwise direct paths to the school.

Bicycle connectivity is generally strong, supported by a network of Class I, II, and III facilities along key corridors such as Maple Avenue, Princeton Avenue, Shields Avenue, and the McKinley Avenue/Mill Ditch path. However, critical gaps remain. The area south of McKinley Avenue lacks direct east–west connectivity due to multiple barriers, and there is no convenient north–south route to residence near SR-168. Barton Avenue, a main north–south corridor entire study area, lacks bicycle facilities and includes long, uninterrupted segments without posted speed limits or traffic calming, creating conditions that reduce the safety and comfort of bicycling as well as walking.

Connectivity throughout the study area is heavily influenced by major linear barriers, including SR-168, the Mill Ditch, and the Union Pacific rail corridor along Floradora Avenue. North of McKinley Avenue, the only major barrier is SR-168. Shared and pedestrian overpasses are well spaced to in this region and provide convenient crossings for most residences east of SR-168, supported by generally well connected sidewalks, crosswalks, and bicycle facilities to these crossings. However south of McKinley Avenue, all three linear barriers combine to make connectivity poor which is amplified by a lack of sidewalk and bicycle facilities. These barriers also leave open space and overhead cover which tend to attract loiterers and homeless encampments making the region and some of the few linear barriers crossings feeling unsafe, particularly the central underpass crossing of Floradora Avenue and SR-168. These challenges result in most residences south of McKinley Avenue having an inconvenient circuitous continuous route to utilize pedestrian or bicycle facilities that still face safety concerns even along a longer route.

In summary, while portions of the study area provide functional and connected routes, the overall network lacks complete continuity, and key gaps, particularly the County jurisdiction areas north of Clinton Avenue and east of SR-168 who utilize Maple Avenue, the area south of McKinley Avenue.

5.0 Project Impact Analysis

The following section evaluates potential project effects on Safe Routes to School and transportation safety conditions related to the physical environment within the project's control.

5.1 Project Trip Generation

The project would reconstruct and modernize existing facilities at Norman Elementary School without increasing student capacity or enrollment. Therefore, the project would not increase or alter overall school-related trip generation.

5.2 Project Circulation

The project includes modifications to on-site vehicle circulation while maintaining existing pedestrian and bicycle access patterns. The primary student entrance would remain centrally located along Weldon Avenue, and pedestrian and bicycle circulation routes would generally remain unchanged.

5.2.1 Reconstructed Northeast Parking Lot

The existing north-central parking lot would be demolished and reconstructed as a larger parking area fronting both Weldon Avenue and Woodrow Avenue. The redesigned lot would include a one-way drop-off loop, with an entrance from Weldon Avenue (in the same general location as the existing access point) and to Woodrow Avenue.

The Weldon Avenue entrance would be located approximately 320 feet from the intersection of Weldon and Woodrow Avenues, and the Woodrow Avenue exit would be located approximately 240 feet from the same intersection. These distances provide adequate line of sight for vehicles entering and exiting the site.

The redesigned parking lot would remove existing on-street parking along Weldon Avenue adjacent to the school frontage, eliminating frequent vehicle backing maneuvers in front of the campus and reducing conflicts between vehicles and pedestrians.

The primary drop-off and pick-up area would continue to be supported by existing traffic safety features along Weldon Avenue, including marked crosswalks, school signage, speed humps, pavement markings ("SLOW SCHOOL XING"), reduced speed limit signage (10 mph), and No U-turn signage. Along Woodrow Avenue, existing crosswalks and signage at the intersections with Weldon Avenue and University Avenue, as well as pavement markings, would continue to provide defined pedestrian crossing locations.

Compared to existing conditions, the one-way drop-off loop would shift a portion of vehicle activity from Weldon Avenue to Woodrow Avenue. This change would reduce turning movements and vehicle congestion at the primary school frontage along Weldon Avenue, thereby reducing potential conflicts with pedestrians and bicyclists accessing the campus. While vehicle activity would increase along Woodrow

Avenue, existing crosswalks, signage, and pavement markings at key intersections would continue to provide visible and controlled pedestrian crossing opportunities.

5.2.2 New South Parking Lot

A new staff parking lot would be constructed along the southern perimeter of the school, fronting University Avenue. The lot would include two driveways located approximately 240 feet and 420 feet west of the intersection of University and Woodrow Avenues.

The proposed parking lot would be limited to staff use and would not serve as a drop-off or student access location. As such, student pedestrian and bicycle circulation would remain concentrated along Weldon Avenue and Woodrow Avenue. The addition of this parking lot would redistribute some staff traffic away from the primary drop-off area along Weldon Avenue, reducing vehicle activity in the vicinity of the main school entrance and improving overall safety conditions for pedestrians and bicyclists.

5.2.3. Bus Drop-Off Location

The existing bus drop-off location along Weldon Avenue would remain unchanged. Therefore, no changes to bus circulation or associated safety conditions would occur.

5.2.4. Circulation Summary

Overall, the proposed circulation changes would improve traffic organization, reduce vehicle conflicts at the primary school frontage, and maintain or enhance pedestrian and bicycle safety conditions.

However, the project would modify vehicle circulation patterns and introduce new site access features, including revised driveway locations, a one-way drop-off loop, and a new parking lot along University Avenue. Because project design details remain conceptual at this stage, final configurations of drive approaches, circulation patterns, and traffic control features have not been finalized. Without appropriate design and review, these changes could introduce new or exacerbated conflicts between vehicles, pedestrians, and bicyclists, particularly during peak school drop-off and pick-up periods.

Therefore, the project has the potential to result in a significant impact related to transportation safety. To ensure that final design features do not introduce hazards and are consistent with City of Fresno standards, the District shall implement Mitigation Measure TRAN-1, which requires coordination with the City of Fresno during project design to review and refine all circulation and access features.

With implementation of Mitigation Measure TRAN-1, the project would be required to incorporate all necessary safety improvements and design refinements identified by the City of Fresno. As a result, transportation safety impacts would be reduced to a **less than significant level with mitigation incorporated.**

5.3 Coordination with the City of Fresno

At the time of this analysis, project circulation and transportation features are conceptual and may be refined during final design. To ensure that transportation safety conditions are maintained or improved as design details evolve, the following measure is included as a condition of project approval.

Mitigation Measure TRAN-1: Traffic Engineering Consultation with City of Fresno
To ensure safe vehicular, bicycle, and pedestrian access following project implementation, the design build entity shall coordinate directly with the City of Fresno Public Works/Traffic Engineering Division during the project design phase to review and refine the proposed parking lot layout, drive approach locations, internal site circulation, and transportation safety features associated with the reconstructed campus.

This coordination shall include one or more meetings during the design process and shall result in documented concurrence from the City of Fresno regarding the location and design of access points, circulation patterns, and reasonable on site or off site transportation safety improvements prior to submittal of encroachment permit applications.

As a condition of project approval, the project applicant shall identify and implement all reasonable transportation safety improvements required by the City of Fresno to maintain safety and operational efficiency within the public right of way as a result of the project. Required improvements shall be based on applicable City of Fresno standards, adopted policies, and site specific safety considerations, and shall be limited to measures reasonably related to project effects. Such improvements may include, but are not limited to, installation or modification of traffic control signage, pavement striping, marked crosswalks, drive approach improvements, traffic calming features, bicycle or pedestrian facility enhancements, or comparable safety measures.

All required transportation safety improvements shall be fully constructed and operational prior to occupancy of the reconstructed school, unless an alternative timing is approved in writing by the City of Fresno.

With implementation of TRAN-1, the project would not result in a substantial transportation safety hazard, and impacts would be **less than significant with mitigation incorporated.**

6.0 Conclusions

This Physical Safe Routes to School Analysis documents existing pedestrian and bicycle conditions within the Norseman Elementary School attendance boundary to inform the CEQA evaluation of transportation safety. The study area includes a network of arterial, collector, and local roadways that provide access to the school, supported by a mix of sidewalks, crosswalks, and bicycle facilities.

Existing conditions indicate that continuous pedestrian and bicycle infrastructure is present along several primary corridors, and that the immediate vicinity of the school is supported by well-developed sidewalks, crosswalks, and traffic-calming features that enhance safety. However, connectivity across the broader attendance boundary is variable. Sidewalk coverage is incomplete, particularly along local roadways and within County jurisdiction areas, and gaps in the bicycle network limit connectivity in certain portions of the study area. In addition, major linear barriers, including State Route 168, the Mill Ditch, and the Union Pacific rail corridor, constrain travel patterns and contribute to circuitous routes for some students.

Overall, while portions of the study area provide functional pedestrian and bicycle access to the school, the existing network lacks consistent continuity and directness in several areas. These conditions establish the baseline for evaluating whether the proposed project would result in changes that could adversely affect transportation safety under CEQA.

This analysis is subject to the limitations described in Section 1.2 and is focused on the physical characteristics of the transportation network. It does not include quantitative safety analysis (such as collision data), traffic operations analysis, detailed engineering design, or evaluation of school district programs, travel behavior, or transit service. Accordingly, the findings represent a qualitative assessment of existing infrastructure and connectivity and are intended to inform, rather than comprehensively evaluate, all factors influencing student travel safety.

The proposed project would modernize the existing campus without increasing student enrollment or substantially altering travel demand. Changes to on-site circulation would reorganize vehicle movements and are expected to reduce potential conflicts along the primary school frontage. While the project introduces new circulation features, implementation of Mitigation Measure TRAN-1 would ensure coordination with the City of Fresno to maintain safe conditions for pedestrians, bicyclists, and vehicles.

With mitigation incorporated, the project would not substantially degrade existing pedestrian and bicycle safety conditions or introduce new hazards. Therefore, transportation safety impacts would be less than significant with mitigation incorporated.

7.0 Non-CEQA Future Recommendations

The following recommendations are provided for informational purposes and are intended to support ongoing coordination between Fresno Unified School District, the City of Fresno, the County of Fresno, and other agencies. These recommendations are not required mitigation measures under CEQA but are presented as potential opportunities to enhance pedestrian and bicycle safety and connectivity based on observed conditions in the study area.

Recommendation 1: Maple Avenue Corridor Enhancements

Location: Maple Avenue corridor

Issue:

Maple Avenue serves as the primary north–south corridor for student travel but contains sidewalk gaps and limited marked crossing opportunities at local street intersections, which reduces pedestrian continuity and crossing visibility.

Recommendation:

Sidewalk gap infill along the Maple Avenue corridor could be considered, along with the potential addition or enhancement of marked crosswalks at select local street intersections to improve pedestrian connectivity and visibility along this key route.

Evaluation:

- **Relative Cost:** Medium
- **Implementation Complexity:** Moderate (City and County Coordination and ROW acquisition)
- **Implementation Timeframe:** Mid-term
- **Potential Safety Benefit:** High

Recommendation 2: Barton Avenue Multimodal Corridor Improvements

Location: Barton Avenue corridor

Issue:

Barton Avenue functions as an important north–south route west of SR-168 but lacks dedicated bicycle infrastructure. Narrow roadside conditions and utility conflicts further constrain pedestrian space. Long local roads with minimal traffic calming features likely result in increased traffic speeds.

Recommendation:

A combination of improvements could be considered along Barton Avenue, including traffic calming measures, addition of bicycle accommodations, targeted sidewalk infill, and relocation or adjustment of utility features (e.g., poles, hydrants) where feasible to improve pedestrian and cyclist comfort and safety.

Evaluation:

- **Relative Cost:** Medium to High
- **Implementation Complexity:** Moderate to High
- **Implementation Timeframe:** Mid-term
- **Potential Safety Benefit:** High

Recommendation 3: Network Expansion in Areas Without Sidewalk Infrastructure

Location: Identified neighborhoods with limited or no sidewalks, including the areas bounded by:

- Shields Avenue (north), SR-168 (west), Maple Avenue (east), and Clinton Avenue (south)
- Princeton Avenue (north), Maple Avenue (west), Sierra Vista Avenue (east), and Cambridge Avenue (south)
- Fountain Way (north), Cedar Avenue (west), Barton Avenue (east), and Princeton Avenue (south)
- Small irregular gaps also exist within the study area and should be considered for inclusion in this effort.

Issue:

Several residential areas, particularly within County jurisdiction, lack sidewalk infrastructure due to right-of-way limitations, reducing pedestrian accessibility and route availability.

Recommendation:

Over the long term, sidewalk installation could be considered in areas without existing infrastructure, particularly along routes that connect residential areas to collector and arterial roadways or key crossing locations.

Evaluation:

- **Relative Cost:** High
- **Implementation Complexity:** High
- **Implementation Timeframe:** Long-term
- **Potential Safety Benefit:** High

Recommendation 4: Southwest Area Connectivity Improvements

Location: South of McKinley Avenue and west of Maple Avenue

Issue:

Partial sidewalk coverage exists, but pedestrian routes are discontinuous and indirect due to gaps and the presence of linear barriers.

Recommendation:

Targeted sidewalk infill, improved pedestrian connections, and enhancements to crossing points could be considered to create more direct and continuous routes between residential areas and the school.

Evaluation:

- **Relative Cost:** Medium
- **Implementation Complexity:** Moderate
- **Implementation Timeframe:** Mid-term
- **Potential Safety Benefit:** Moderate to High

Recommendation 5: Sidewalk Maintenance, Accessibility, and Code Enforcement

Location: Study area-wide

Issue:

Observed impediments including: overgrown vegetation, driveway vehicle encroachments, damaged

sidewalks, and accessibility limitations reduce the usability of existing pedestrian infrastructure. Additional concerns include loose or stray dogs affecting perceived and actual safety.

Recommendation:
Continued code enforcement and maintenance efforts could be considered to address sidewalk obstructions, vegetation overgrowth, illegal parking across sidewalks, and loose animals. In addition, ongoing sidewalk maintenance programs could incorporate ADA-related improvements, including repair of cracked or uplifted surfaces and upgrades to curb ramps and accessible routes.
Evaluation:

- **Relative Cost:** Low to Medium
- **Implementation Complexity:** Low
- **Implementation Timeframe:** Near-term / Ongoing
- **Potential Safety Benefit:** Moderate

Recommendation 6: Railroad Corridor (Floradora Avenue) Crossing Enhancements

Location: Cedar Avenue, Maple Avenue, and Barton Avenue at Floradora Avenue/rail corridor
Issue:
Existing crossings of the Union Pacific rail corridor lack consistent pedestrian infrastructure, including sidewalks and marked crosswalks, and present safety and accessibility challenges.
Recommendation:
Improvements could be considered at key rail corridor crossings, including installation or enhancement of sidewalks, clearly defined pedestrian crossings, and pavement markings to improve visibility and continuity for pedestrians and bicyclists.
Evaluation:

- **Relative Cost:** Medium
- **Implementation Complexity:** Moderate to High
- **Implementation Timeframe:** Mid-term
- **Potential Safety Benefit:** High

Recommendation 7: Safety and Perception Enhancements at Key Barrier Crossings

Location:

- Floradora Avenue/SR-168 underpass
- Olive Avenue/SR-168 underpass
- Mill Ditch crossings at Cedar Avenue and Maple Avenue
- Floradora Avenue rail corridor
- Along SR-168 and Barton Avenue

Issue:
Major barrier crossings exhibit conditions that may reduce perceived and actual safety, including limited visibility, constrained pedestrian space, and observed loitering activity.

Recommendation:
Improvements to the physical environment, such as enhanced lighting, visibility enhancements, and routine maintenance, could be considered at key crossing locations to improve pedestrian and bicyclist comfort. In addition, coordination with local law enforcement and code enforcement agencies could be considered to support periodic presence, monitoring, and response at identified locations with recurring safety concerns.
A coordinated approach combining environmental improvements and targeted enforcement may help improve both actual and perceived safety for students and other users of these facilities. Environmental design strategies, such as maintaining clear sightlines and reducing concealment areas, could also be incorporated where feasible.
Evaluation:

- Relative Cost: Low to Medium
- Implementation Complexity: Moderate
- Implementation Timeframe: Near-term to Mid-term / ongoing
- Potential Safety Benefit: High

Closing Remarks

The recommendations presented herein reflect potential opportunities to enhance pedestrian and bicycle safety, connectivity, and overall accessibility within the Norseman Elementary School attendance boundary. These considerations highlight broader patterns in the built environment that influence how students and community members experience and utilize the local transportation network.

Fresno Unified School District remains committed to supporting safe and accessible travel for all students and would continue to engage in ongoing study, coordination, and collaboration with the City of Fresno, the County of Fresno, and other partner agencies. Through participation in future planning efforts, data sharing, and interagency coordination, the District would support continued evaluation of transportation conditions and identification of opportunities to enhance infrastructure, connectivity, and safety across school attendance areas.

Efforts to improve pedestrian and bicycle infrastructure provide co-benefits that extend beyond school travel, including enhanced neighborhood connectivity, support for local economic activity, improved public health outcomes, and strengthened community cohesion. In addition, many of the challenges identified in this analysis are more prevalent in areas with greater socioeconomic vulnerability, where access to safe and reliable transportation options is particularly important. Continued attention to these conditions would support more equitable access to safe routes for students and the broader community.

Implementation of potential improvements may also be supported through a variety of local, regional, state, and federal funding sources. Programs such as the State Active Transportation Program (ATP), regional Measure C Safe Routes to School funding, and other competitive grant opportunities provide mechanisms to advance infrastructure and safety improvements in coordination with partner agencies. Through continued collaboration, the District would support efforts to identify and pursue these funding opportunities where appropriate to help advance projects that improve safety and accessibility.

Through ongoing partnership, coordination, and strategic pursuit of funding opportunities, Fresno Unified School District would continue to support initiatives and projects that advance transportation safety and accessibility, contributing to the overall well-being and resilience of the communities it serves.

List of Preparers

Lead Agency:

Fresno Unified School District
Alex Belanger
Chief Executive, Operational Services
Fresno Unified School District
2309 Tulare Street
Fresno, CA 93721
Telephone: (559) 457-3074
Email: William.Belanger@fresnounified.org

Environmental Consultant:

Blair, Church & Flynn Consulting Engineers, Inc.
451 Clovis Avenue, Suite 200
Clovis, CA 93612
(559) 326-1400
www.bcf-engr.com

Michael Gennaro, QSD, CPESC,
Lead Environmental Specialist
Email: mgennaro@bcf-engr.com

David K. Young
Senior Environmental Specialist
Email: dyoung@bcf-engr.com

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Attachment A: Photos of Typical Pedestrian/Bicycle Facilities

The following photos were taken during a pedestrian survey conducted by Michael Gennaro on June 12, 2026 between 8 am and 10 am to supplement analysis of aerial images and provide a general understanding of transportation conditions in the study area.



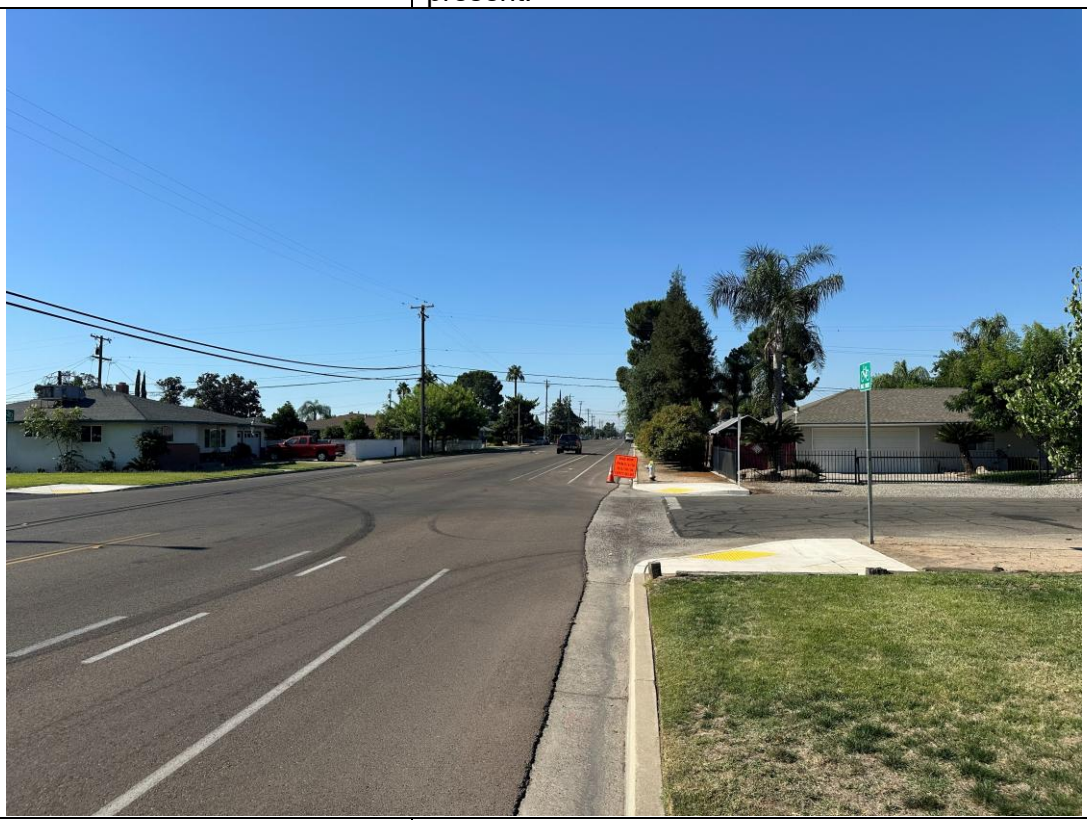
#1	**Location:** Cedar Ave & Cornell Avenue	**Comments:** Curb ramps present. Poor Sidewalk Connectivity along Maple Ave. No crosswalks present. Class II Bike Lane present.



#2	**Location:** Cedar Ave & Cornell Avenue	**Comments:** Typical neighborhood road in region in County jurisdiction with no sidewalks.



#3	**Location:** Cedar Ave (between Simpson and Cornella Ave)	**Comments:** Example of typical poor private property landscaping encroaching on sidewalk. Class II Bike Lane present.



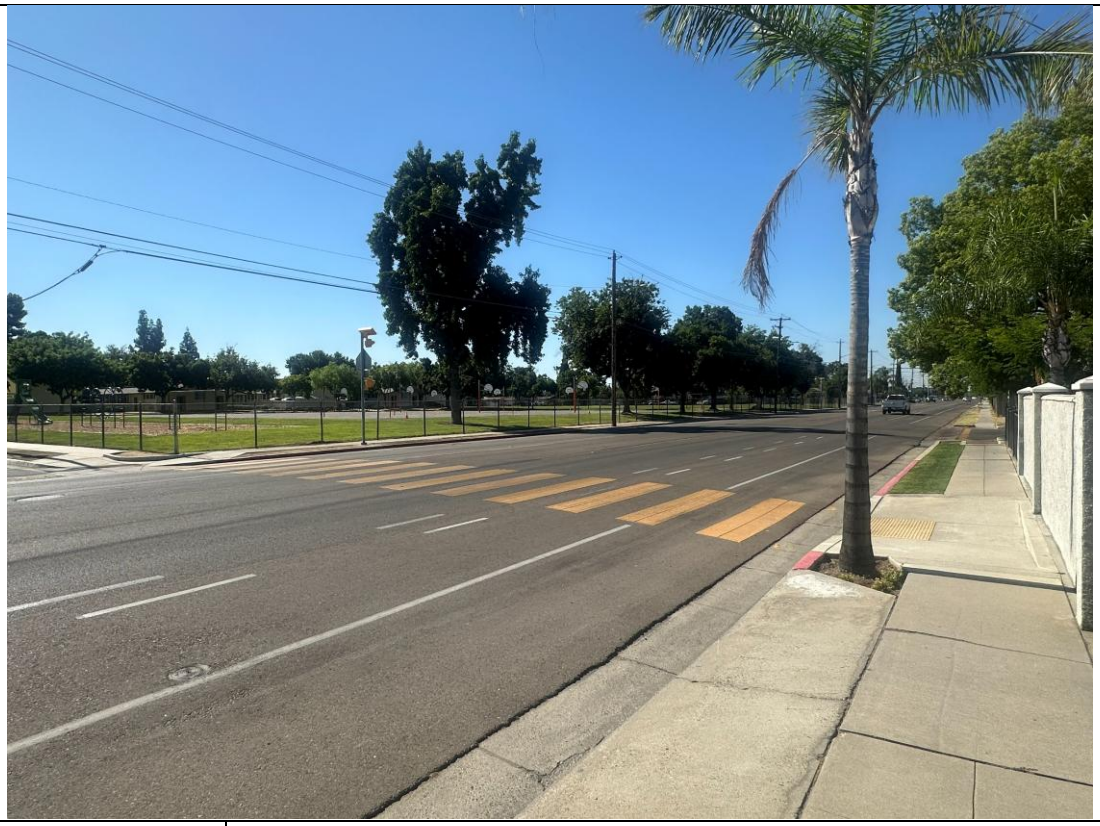
#4	**Location:** Cedar Ave & Princeton Ave	**Comments:** Poor sidewalk connectivity. Private landscaping obstructing sidewalk alignment. Class II Bike Lane present. No crosswalk present



#5	**Location:** Maple and Clinton Ave	**Comments:** Signalized crossing of main streets of Clinton and Maple Avenues. Crossing to east side (left) of Maple Avenue brings pedestrian to City jurisdiction side with continuous sidewalk to Norseman Elementary School.



#6	**Location:** Cedar Ave and Cambridge Ave	**Comments:** Sidewalk absent before crosswalk to Norseman Elementary School on right/west side. Continuous Sidewalk present on left/east side of Maple Ave. No crosswalk present.



#7	**Location:** Maple and Weldon Ave	**Comments:** High visibility cross walk crossing Maple Avenue to Norseman Elementary School. Sidewalk absent behind photo direction (see photo #6)



#8	**Location:** Maple and Weldon Ave	**Comments:** Crosswalk crossing Weldon Avenue to Norseman Elementary School. Note flashing crosswalk light and sign along Maple Avenue.



#9	**Location:** Weldon Ave (in front of school)	**Comments:** Sidewalk (both sides), speed bumps, and crosswalk signage present in front of school entrance.



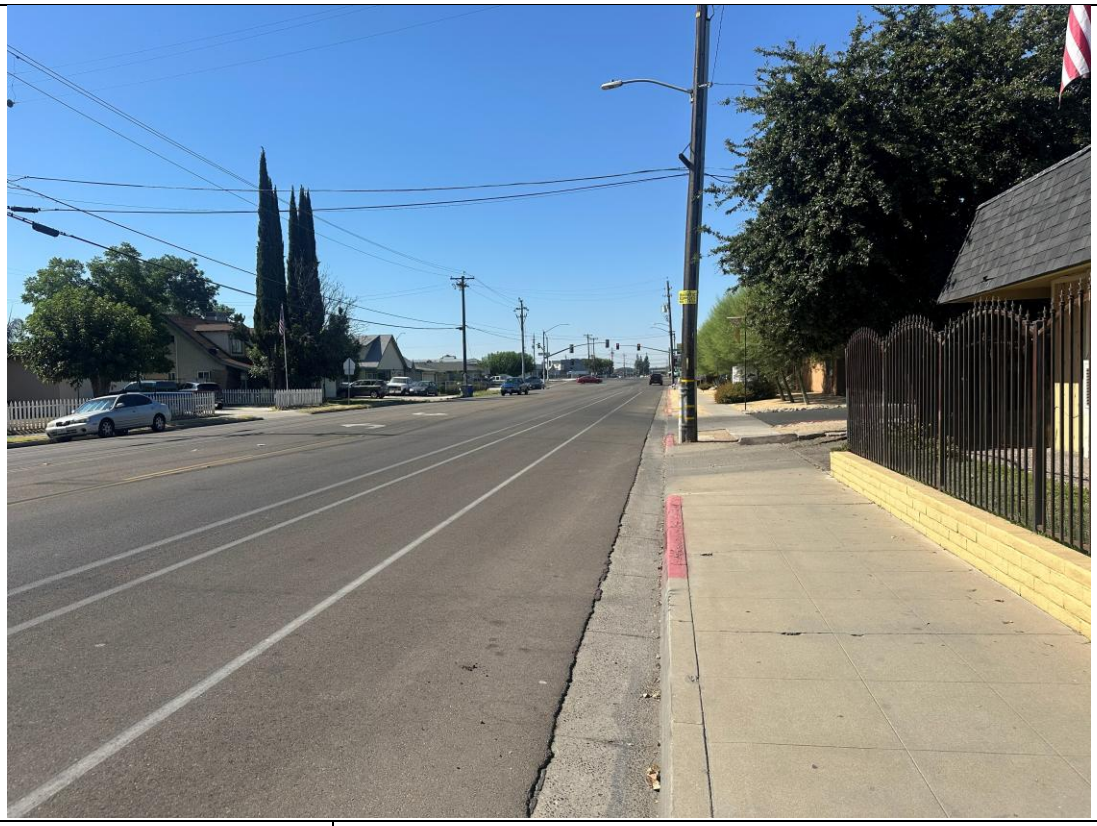
#10	**Location:** Woodrow Ave (east of school)	**Comments:** Sidewalk present on school side of road, and lack of sidewalk on opposite side of residential road, typical of this block.



#11	**Location:** Woodrow and University Ave	**Comments:** Crosswalks present, leading to sidewalk surrounding Norseman Elementary School. Lack of sidewalk connectivity away from school along residential road.



#12	**Location:**	**Comments:** Existing sidewalk along Maple Ave, south of campus. Lack of crosswalk at residential cross streets along Maple Ave.



#13	**Location:** Maple Ave, looking south towards McKinley Ave	**Comments:** Sidewalk connectivity is good south of campus, in existing/historically City of Fresno jurisdiction areas. Class II bike lane present.



#14	**Location:** Maple and McKinley Ave	**Comments:** Signalized crossing of main streets of McKinley and Maple Avenues. Busy, fast, and wide intersection for student crossing.



#15	**Location:** Barton and Weldon Ave	**Comments:** Continuous sidewalk along Barton Avenue provides consistent north/south path west of Hwy 168, leading to two pedestrian overpasses.



#16	**Location:** Barton and Weldon Ave	**Comments:** Crosswalk and crosswalk signage (see photo #15) present for path to Hwy 168 pedestrian overpass. Overpass leads to continuous sidewalk path to Norseman Elementary School.



#17	**Location:** Barton and Brown Ave	**Comments:** Sidewalk is continuous along Barton Avenue, but has sections in poor condition and regular obstructions (utility poles and hydrants). Lack of bike lane, long/straight local road, lack of posted speed limit and traffic calming measures make biking less safe.



#18	**Location:** Barton and Princeton Avenue	**Comments:** Crosswalk to Princeton Avenue alignment Hwy 168 pedestrian overpass.



#19	**Location:** Princeton Ave Hwy 168 Pedestrian overpass (east end)	**Comments:** Overpass leads to small section of sidewalk, but leads to residential roads in County jurisdiction with no sidewalk.



#20	**Location:** Princeton Ave Hwy 168 Pedestrian overpass (east end)	**Comments:** Pathway to Norseman Elementary School immediately after exiting pedestrian overpass, facing east. Note no sidewalk along neighborhood road.



#21	**Location:** Barton and Floradora Avenues	**Comments:** Lack of crosswalk at the only central paved road crossing of Floradora Avenue/the Union Pacific Railroad.



#22	**Location:** Floradora Avenue underpass and SR-168	**Comments:** poor visibility and sheltered conditions contribute to loitering and encampments, resulting in a key crossing with both real and perceived safety concerns.

Appendix E: AB 52 Tribal Consultation Records

NATIVE AMERICAN HERITAGE COMMISSION

CHAIRPERSON
REGINALD PAGALING
CHUMASH

VICE-CHAIRPERSON
BUFFY MCQUILLEN
YOKAYO POMO, YUKI, NOMLAKI

SECRETARY
ISAAC BOJORQUEZ
OHLONE-COSTANOAN

PARLIAMENTARIAN
WAYNE NELSON
LUISEÑO

COMMISSIONER
SARA DUTSCHKE
MIWOK

COMMISSIONER
STANLEY RODRIGUEZ
KUMEYAAY

COMMISSIONER
BENNAE CALAC
PAUMA-YUIMA BAND OF LUISEÑO INDIANS

COMMISSIONER
VACANT

COMMISSIONER
VACANT

ACTING EXECUTIVE SECRETARY
MICHELLE CARR

NAHC HEADQUARTERS
1550 HARBOR BOULEVARD
SUITE 100
WEST SACRAMENTO,
CALIFORNIA 95691
(916) 373-3710
NAHC@NAHC.CA.GOV

November 6, 2025

Michael Gennaro
Blair, Church & Flynn

Submitted via Electronic
Via Email to: mgennaro@bcf-engr.com

Re: Tribal Consultation Under CEQA, Norseman Elementary School Modernization Project, Fresno County

To Whom It May Concern:

Pursuant to your request, attached is a consultation list of tribes that are traditionally and culturally affiliated with the geographic area of the above-listed project. Additionally, a search of the Native American Heritage Commission (NAHC) Sacred Lands File (SLF) was completed based on the information submitted for the above referenced project. The results were negative. Be aware that tribes do not always record their sacred sites in the SLF, nor are they required to do so. As such, an SLF search is not a substitute for consultation with all tribes that are traditionally and culturally affiliated with a project's geographic area. Please contact all of the listed tribes as they may have information about sacred sites within the project area that is not listed with the NAHC.

Additionally, the NAHC recommends that agencies include with their notification letters, information regarding any cultural resources assessment that has been completed on the area of potential effect (APE), such as:

1. The results of any record search that may have been conducted at an Information Center of the California Historical Resources Information System (CHRIS), including, but not limited to:

- A listing of any and all known cultural resources that have already been recorded on or adjacent to the APE, such as known archaeological sites;
- Copies of any and all cultural resource records and study reports that may have been provided by the Information Center as part of the records search response;
- Whether the records search indicates a low, moderate, or high probability that unrecorded cultural resources are located in the APE; and
- If a survey is recommended by the Information Center to determine whether previously unrecorded cultural resources are present.

2. The results of any archaeological inventory survey that was conducted, including:

- Any report that may contain site forms, site significance, and suggested mitigation measures.

All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for public disclosure in accordance with Government Code section 6254.10.

3. The result of the Sacred Lands File check conducted through the Native American Heritage Commission.

4. Any ethnographic studies conducted for any area including all or part of the APE; and

5. Any geotechnical reports regarding all or part of the APE.

Lead agencies should be aware that records maintained by the NAHC and CHRIS are not exhaustive and a negative response to these searches does not preclude the existence of a tribal cultural resource. A tribe may be the only source of information regarding the existence of a tribal cultural resource, which is why consultation is vital.

This information will aid tribes in determining whether to request formal consultation. If consultation is requested, having the information beforehand will help to facilitate the process.

If you receive notification of a change of address or phone number from a tribe, please inform the NAHC. With your assistance, we can assure that our consultation list remains current.

If you have any questions or require additional information, please contact me at: Pricilla.Torres-Fuentes@nahc.ca.gov.

Sincerely,

Pricilla Torres-Fuentes

Pricilla Torres-Fuentes
Cultural Resources Analyst

Attachment

Norseman Elementary School Modernization Tribal Consultation Correspondence

Contact List	Date Letter Sent to Contact	Date of Response	Comments/Concerns
Amah Mutsun Tribal Band Valentin Lopez, Chairperson P.O. Box 5272 Galt, CA, 95632 Email: vjltestingcenter@aol.com Phone: (916) 743-5833	11/14/25	No comments received as of 06/03/26	
Amah Mutsun Tribal Band Ed Ketchum, Vice-Chairperson P.O. Box 5272 Galt, CA, 95632 Email: aerieways@aol.com Phone: (530) 578-3864	11/14/25	No comments received as of 06/03/26	
Kitanemuk & Yowlumne Tejon Indians Delia Dominguez, Chairperson 115 Radio Street Bakersfield, CA, 93305 Email: 2deedominguez@gmail.com Phone: (626) 339-6785	11/14/25	No comments received as of 06/03/26	
Northern Valley Yokut / Ohlone Tribe Katherine Perez, Chairperson P.O. Box 717 Linden, CA, 95236 Email: canutes@verizon.net Phone: (209) 649-8972	11/14/25	No comments received as of 06/03/26	
Northern Valley Yokut / Ohlone Tribe Timothy Perez, Tribal Compliance Officer P.O. Box 717 Linden, CA, 95236 Email: huskanam@gmail.com Phone: (209) 662-2788	11/14/25	No comments received as of 06/03/26	
Picayune Rancheria of the Chukchansi Indians Heather Airey, Tribal Historic Preservation Officer P.O. Box 2226 Oakhurst, CA, 93644 Email: hairey@chukchansi-nsn.gov Phone: (559) 795-5986	11/14/25	No comments received as of 06/03/26	

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Picayune Rancheria of the Chukchansi Indians Tracey Hopkins, Chairperson P.O. Box 2226 Oakhurst, CA, 93644 Email: council@chukchansi-nsn.gov Phone: (559) 412-5590	11/14/25	12/29/25	Agency thanks district for notification of potential development and request for consultation. Agency declines participation at this time "but would appreciate being notified in the unlikely event that cultural resources are identified."
Table Mountain Rancheria Michelle Heredia-Cordova, Chairperson P.O. Box 410 Friant, CA, 93626 Email: mhcordova@tmr.org Phone: (559) 822-2587 Fax: (559) 822-2693	11/14/25	No comments received as of 06/03/26	
Tule River Indian Tribe Felix Christman, THPO 340 North Reservation Road Porterville, CA, 93257 Email: felix.christman@tulerivertribe-nsn.gov Phone: (559) 719-0420	11/14/25	No comments received as of 06/03/26	
Tule River Indian Tribe Kerri Vera, Environmental Department 340 North Reservation Road Porterville, CA, 93257 Email: kerri.vera@tulerivertribe-nsn.gov Phone: (559) 781-4271	11/14/25	No comments received as of 06/03/26	
Wuksachi Indian Tribe/Eshom Valley Band Kenneth Woodrow, Chairperson 1179 Rock Haven Ct. Salinas, CA, 93906 Email: kwood8934@aol.com Phone: (831) 443-9702	11/14/25	No comments received as of 06/03/26	

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SUPERINTENDENT
Mao Misty Her

November 14, 2025

Valentin Lopez, Chairperson
Amah Mutsun Tribal Band
P.O. Box 5272
Galt, CA 95632

Re: Invitation for Formal Tribal Consultation - Norseman Elementary School Modernization Project

Dear Chairperson Valentin Lopez,

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In accordance with Assembly Bill 52 (AB 52), the District respectfully invites the Amah Mutsun Tribal Band to consult on the Project. The purpose of consultation is to identify tribal cultural resources that may be present within the Project area and that may have religious or cultural significance to your Tribe. Should such resources be identified, the District wishes to work collaboratively with your Tribe to discuss methods to avoid, minimize, or mitigate potential adverse effects.

Project Location

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Consultation Invitation

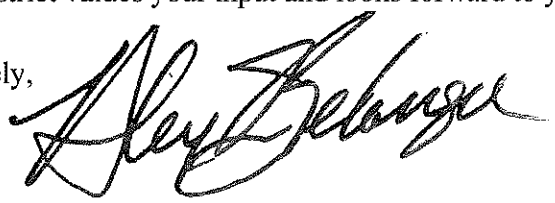
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Please direct your response or any questions to:

Alex Belanger
Chief Executive, Operational Services
Fresno Unified School District
Email: William.Belanger@fresnounified.org
Phone: (559) 867-8200

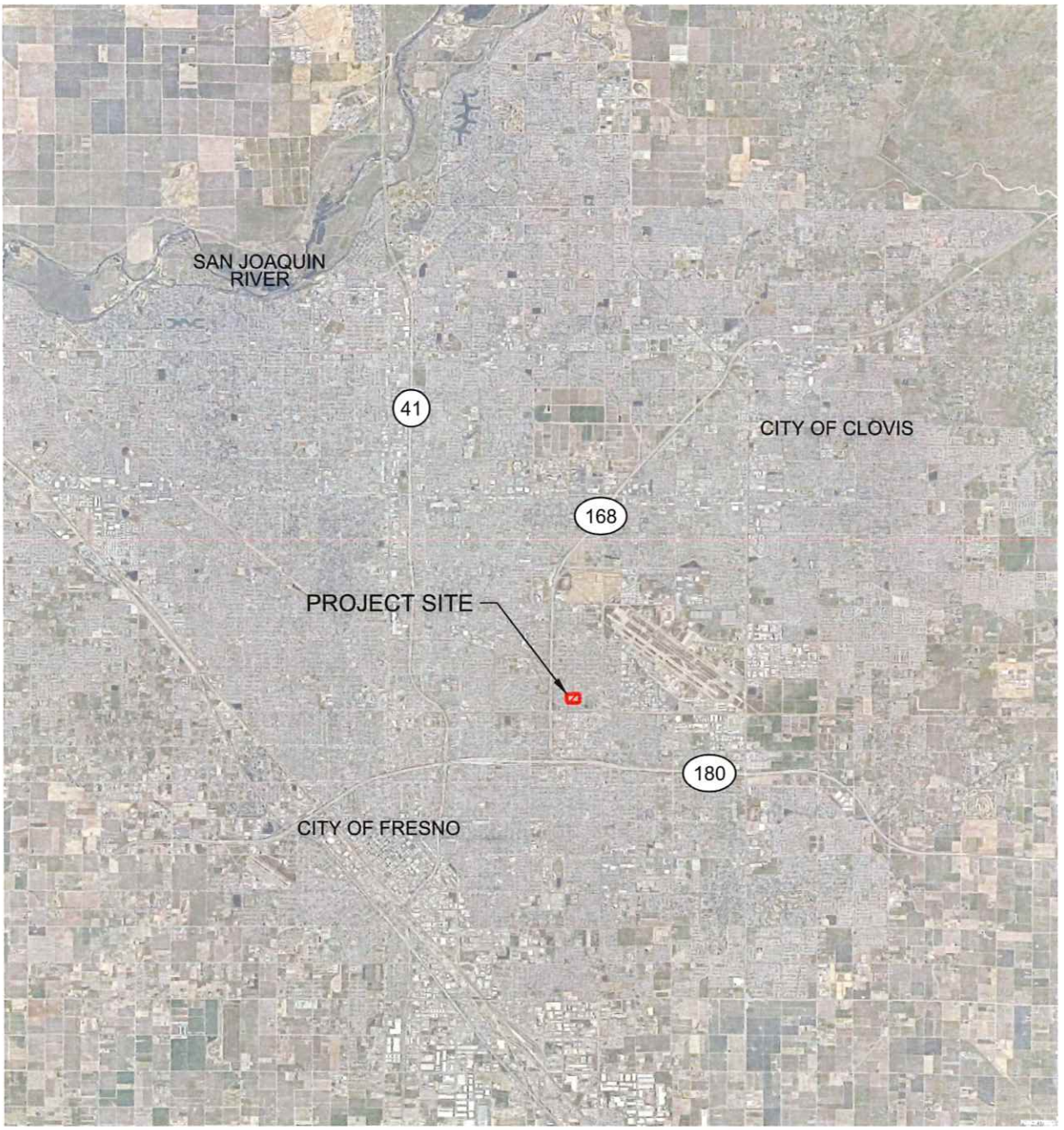
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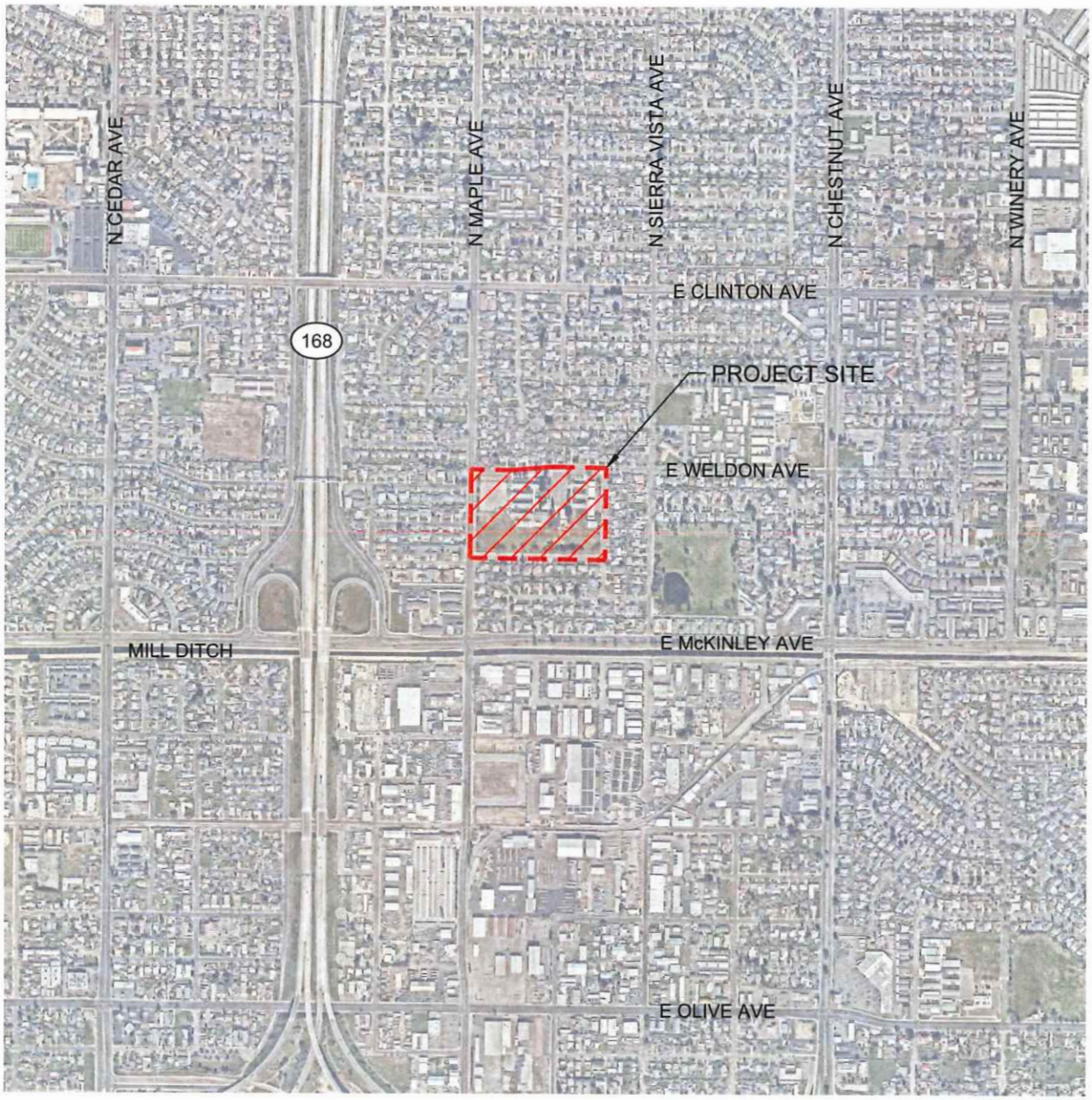
Alex Belanger
Chief Executive, Operational Services
Fresno Unified School District

Figure 1: Location Map



LOCATION MAP
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Figure 1: Vicinity Map



VICINITY MAP
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Figure 2: Project Area of Potential Effect (APE) Map

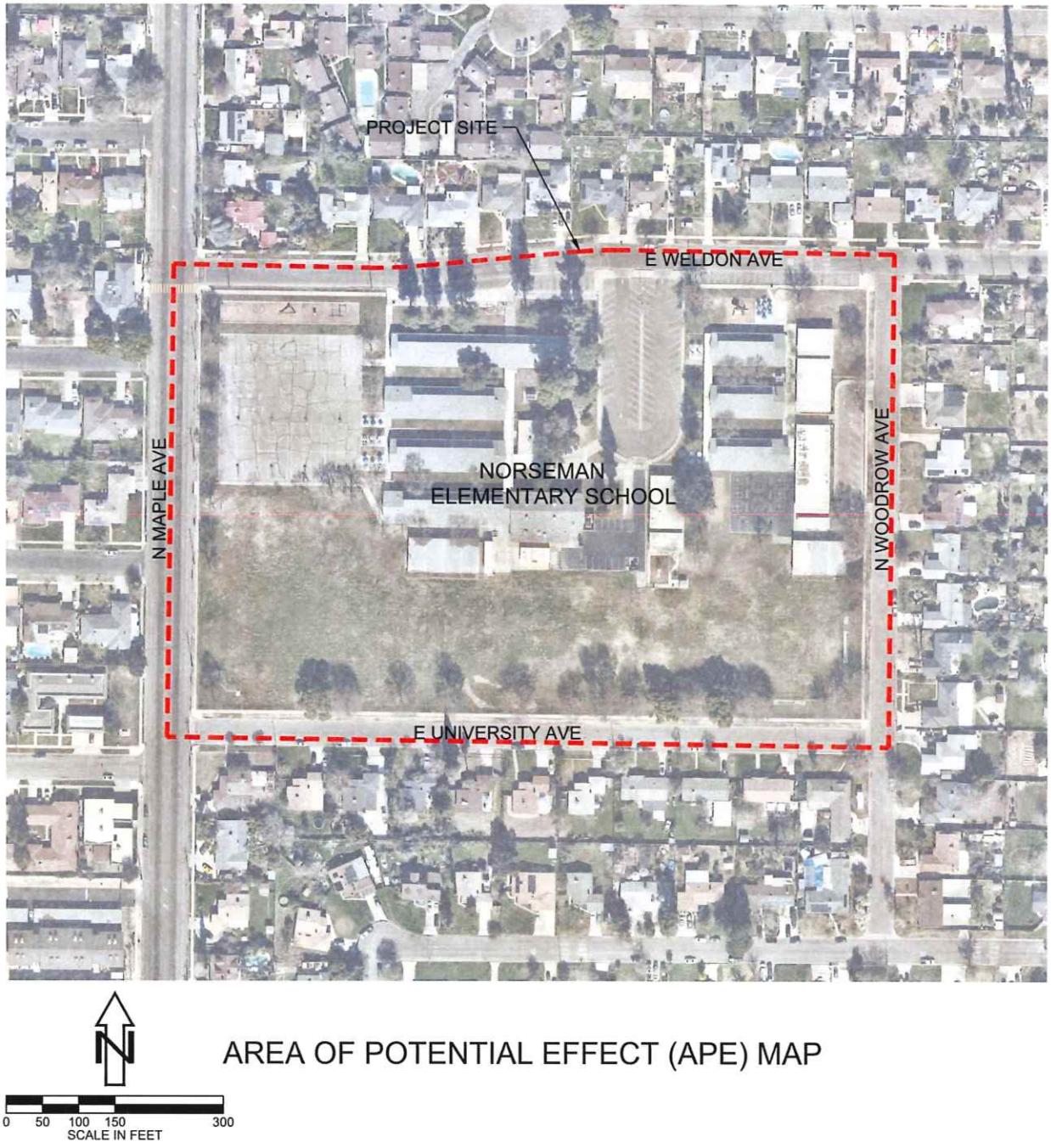
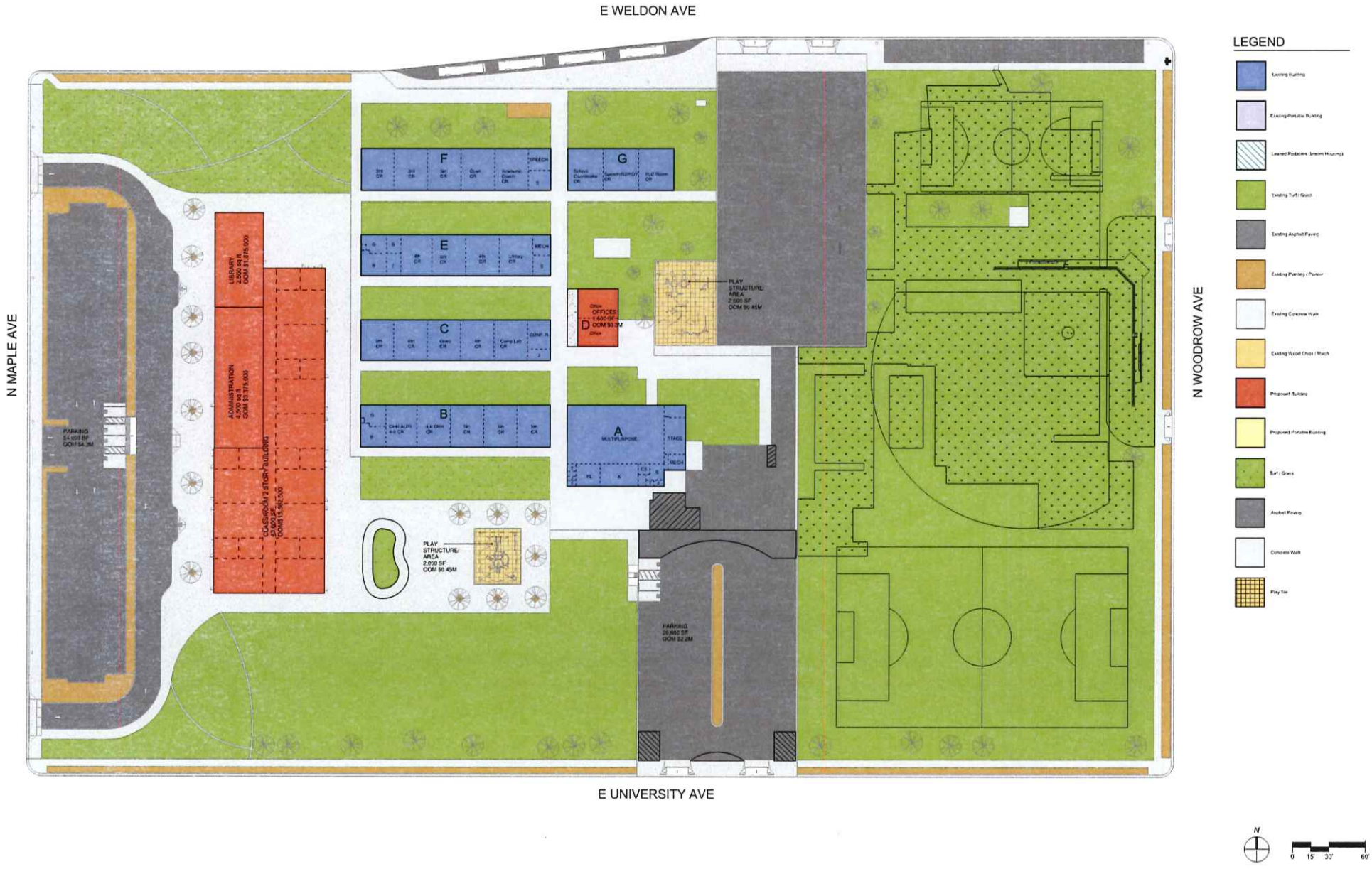


Figure 4: Existing Site Map



Figure 5: Proposed Conceptual Site Plan



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November 14, 2025

Ed Ketchum, Vice-Chairperson
Amah Mutsun Tribal Band
P.O. Box 5272
Galt, CA 95632

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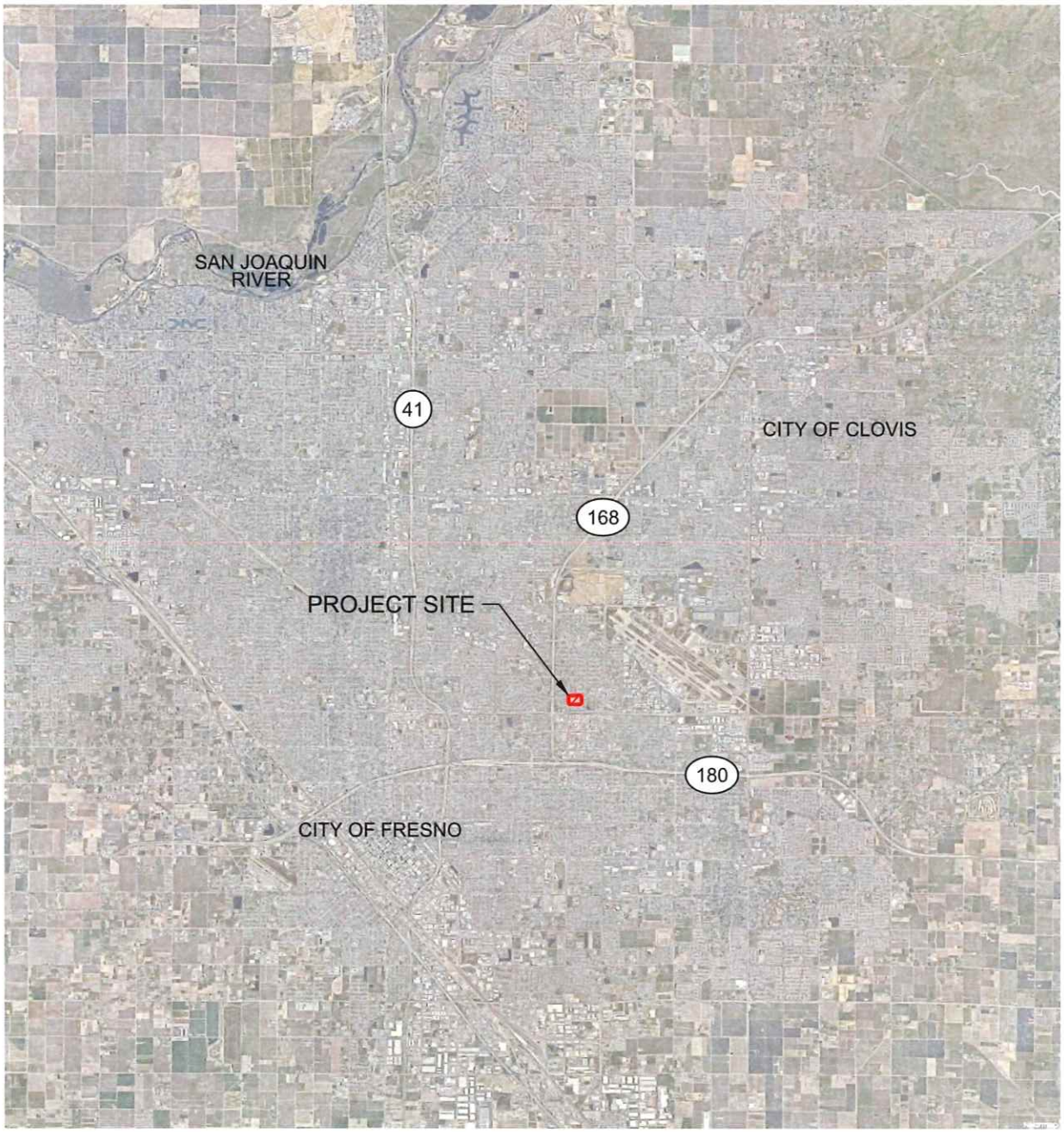
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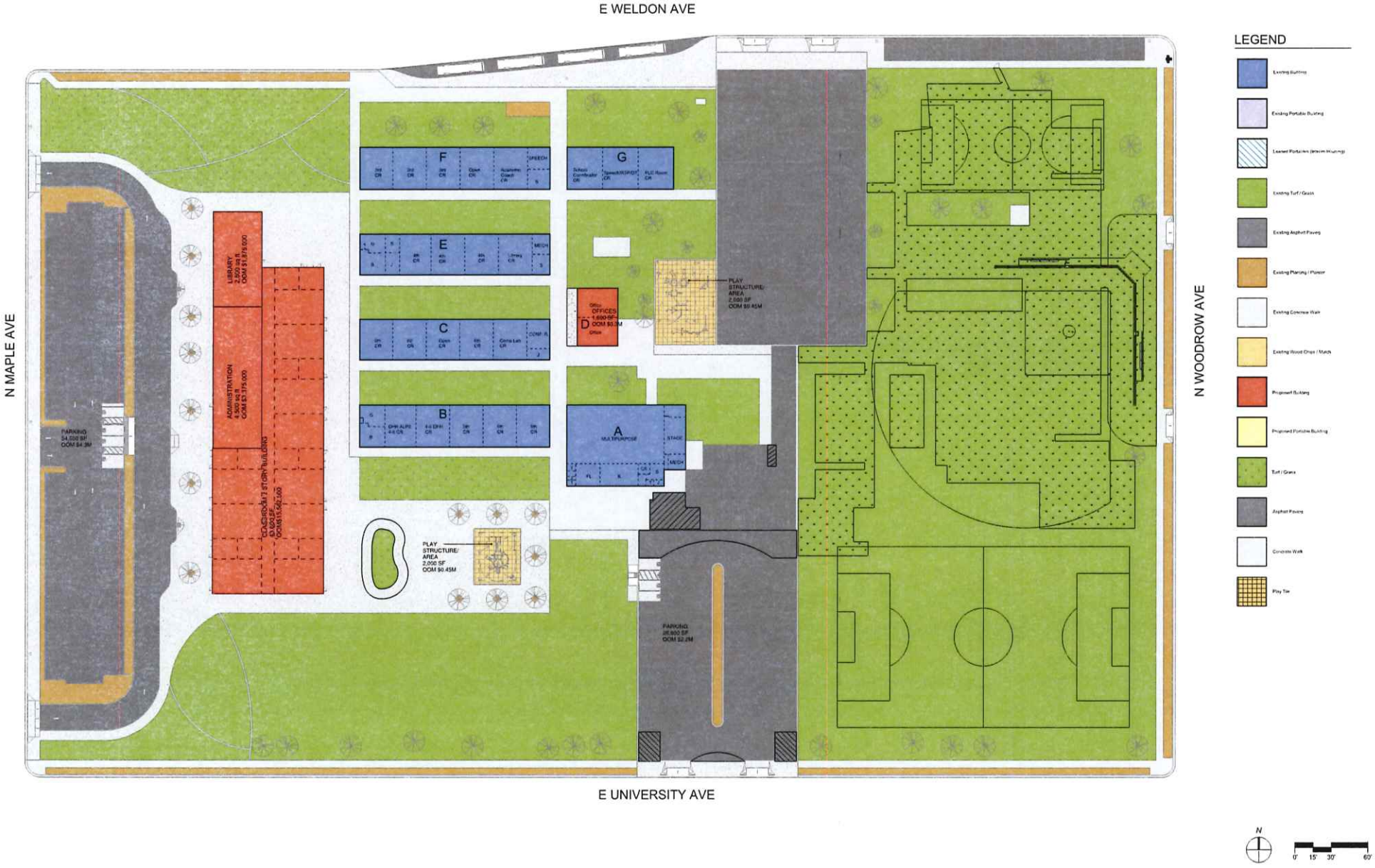
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November 14, 2025

Tracey Hopkins, Chairperson
Picayune Rancheria of the Chukchansi Indians
P.O. Box 2226
Oakhurst, CA 93644

Re: Invitation for Formal Tribal Consultation - Norseman Elementary School Modernization Project

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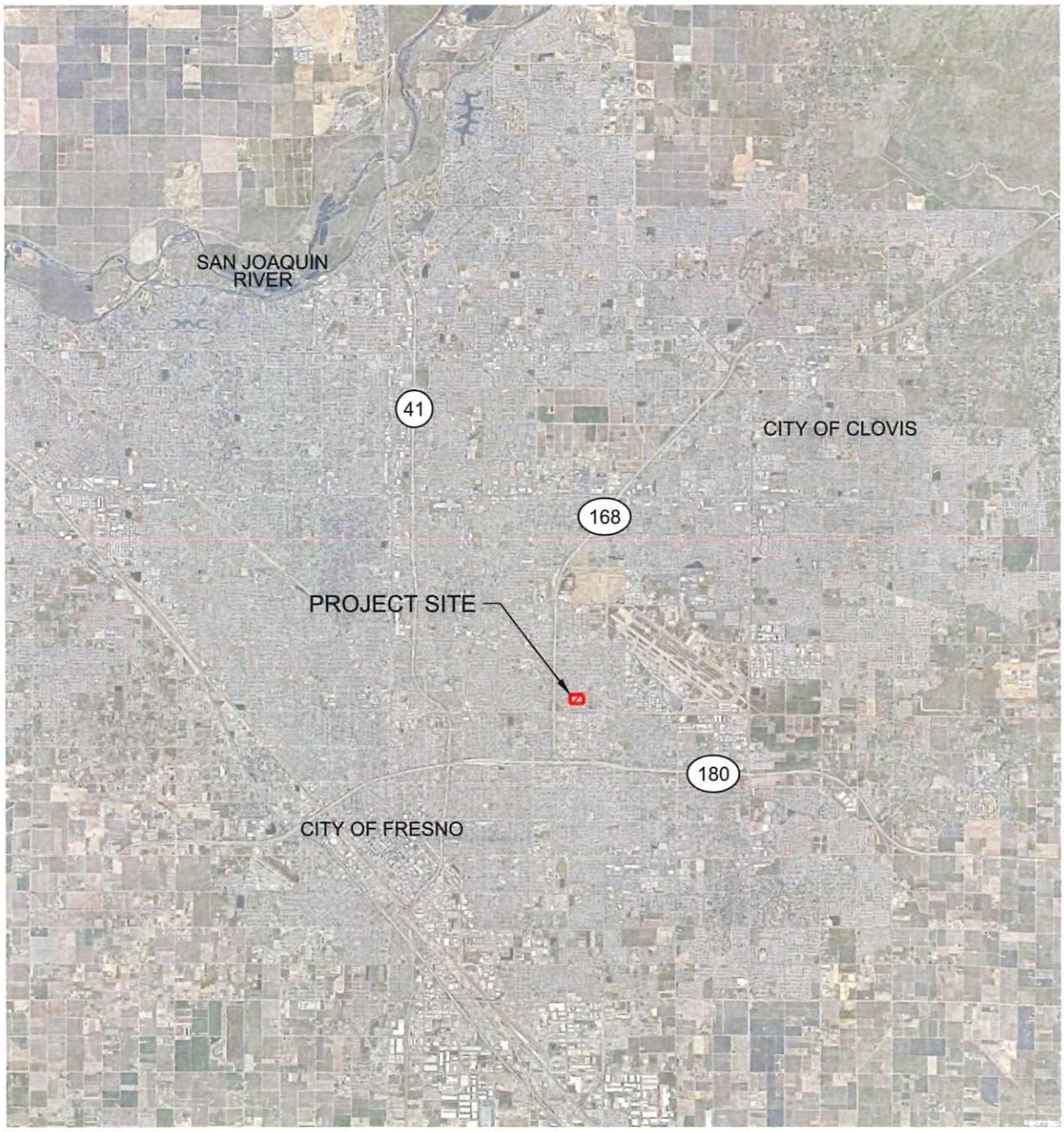
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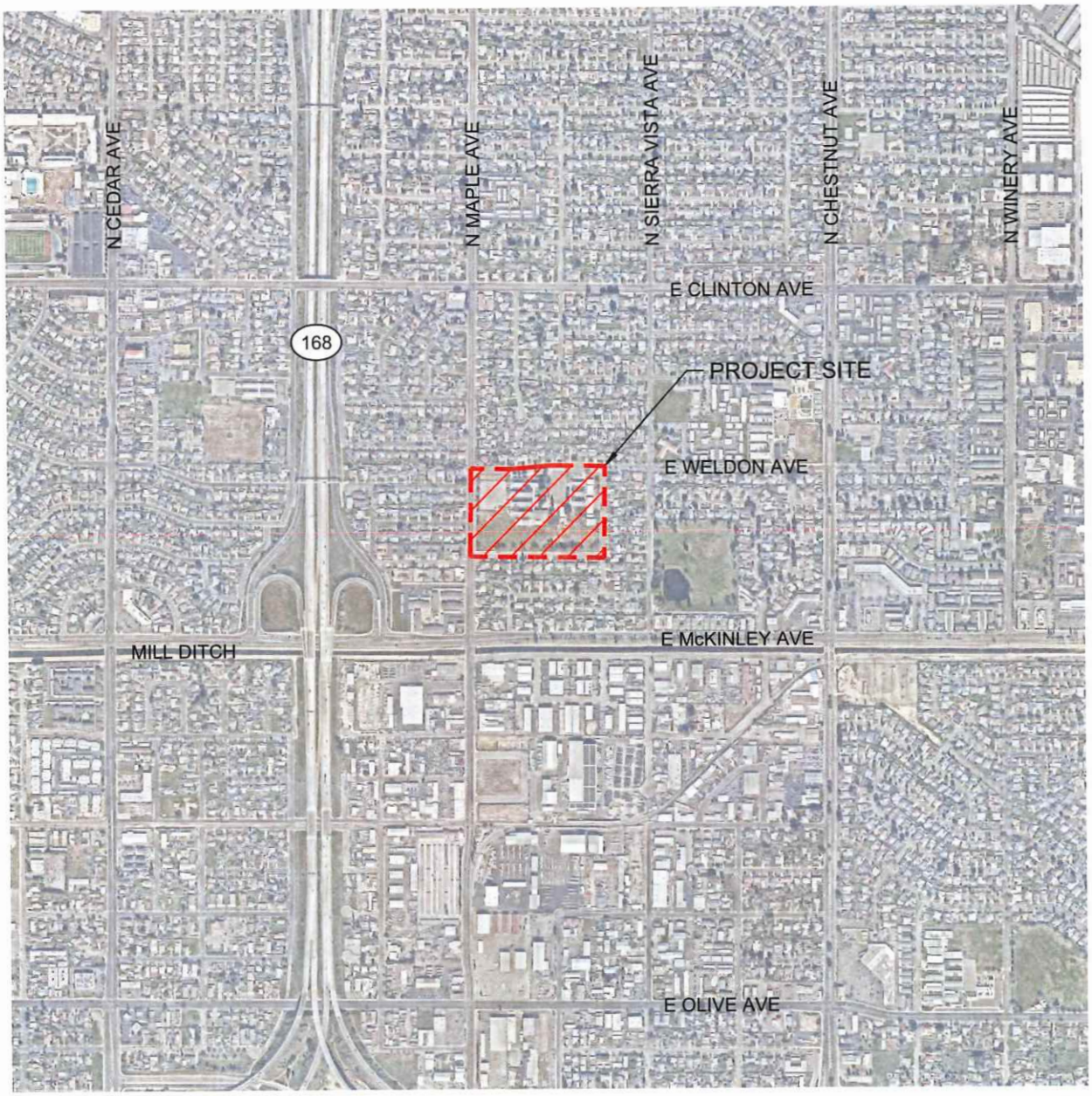
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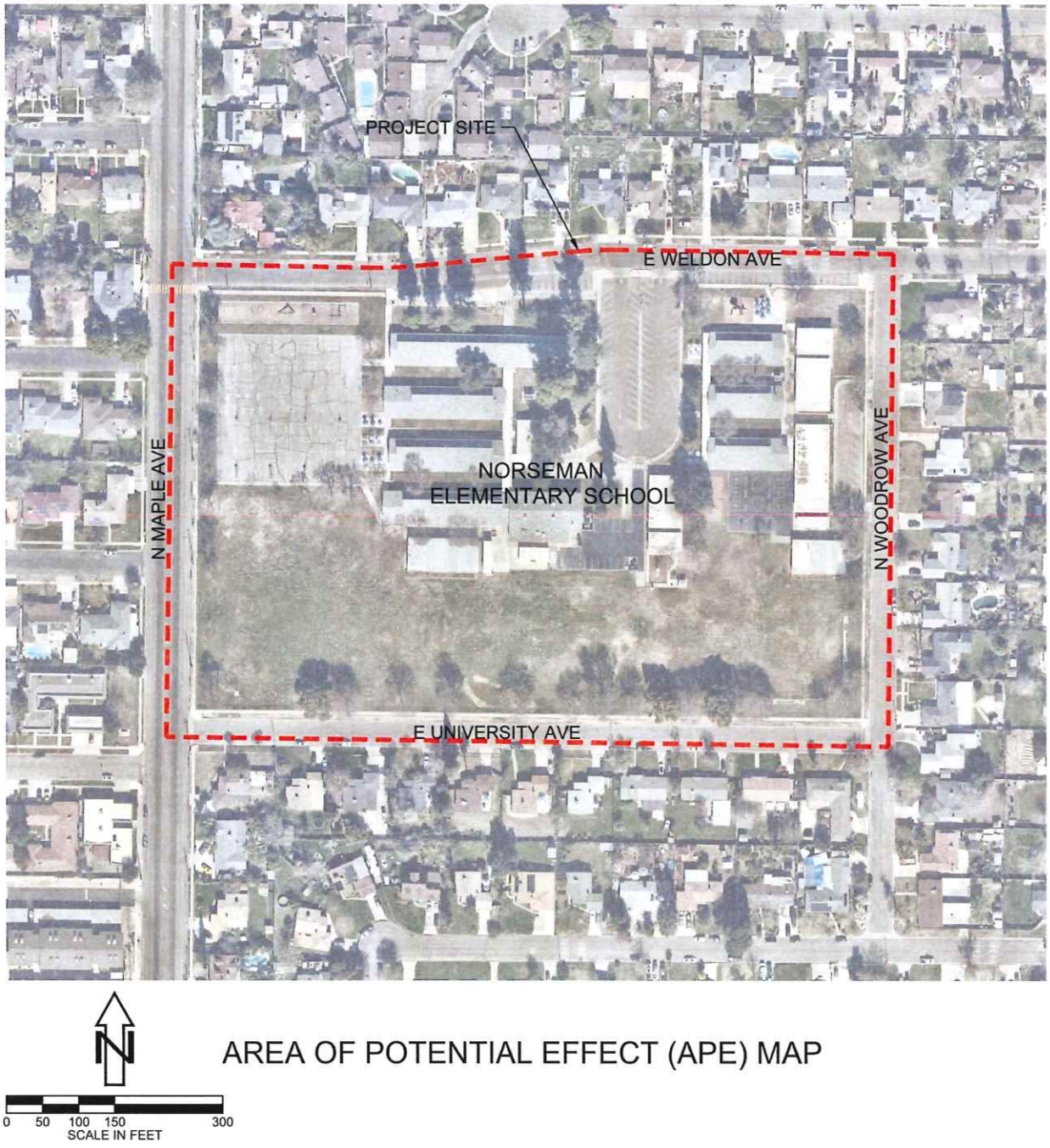
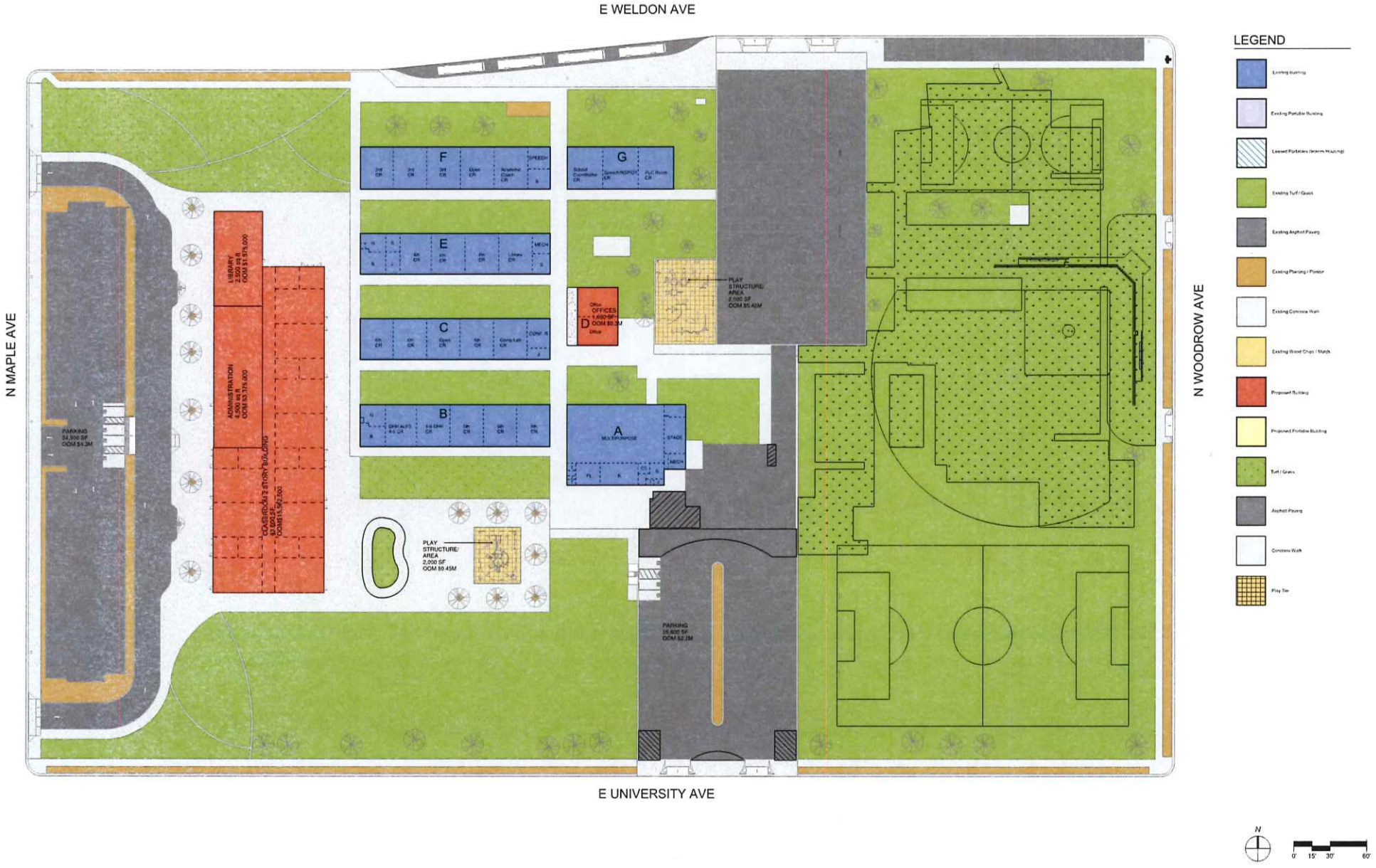


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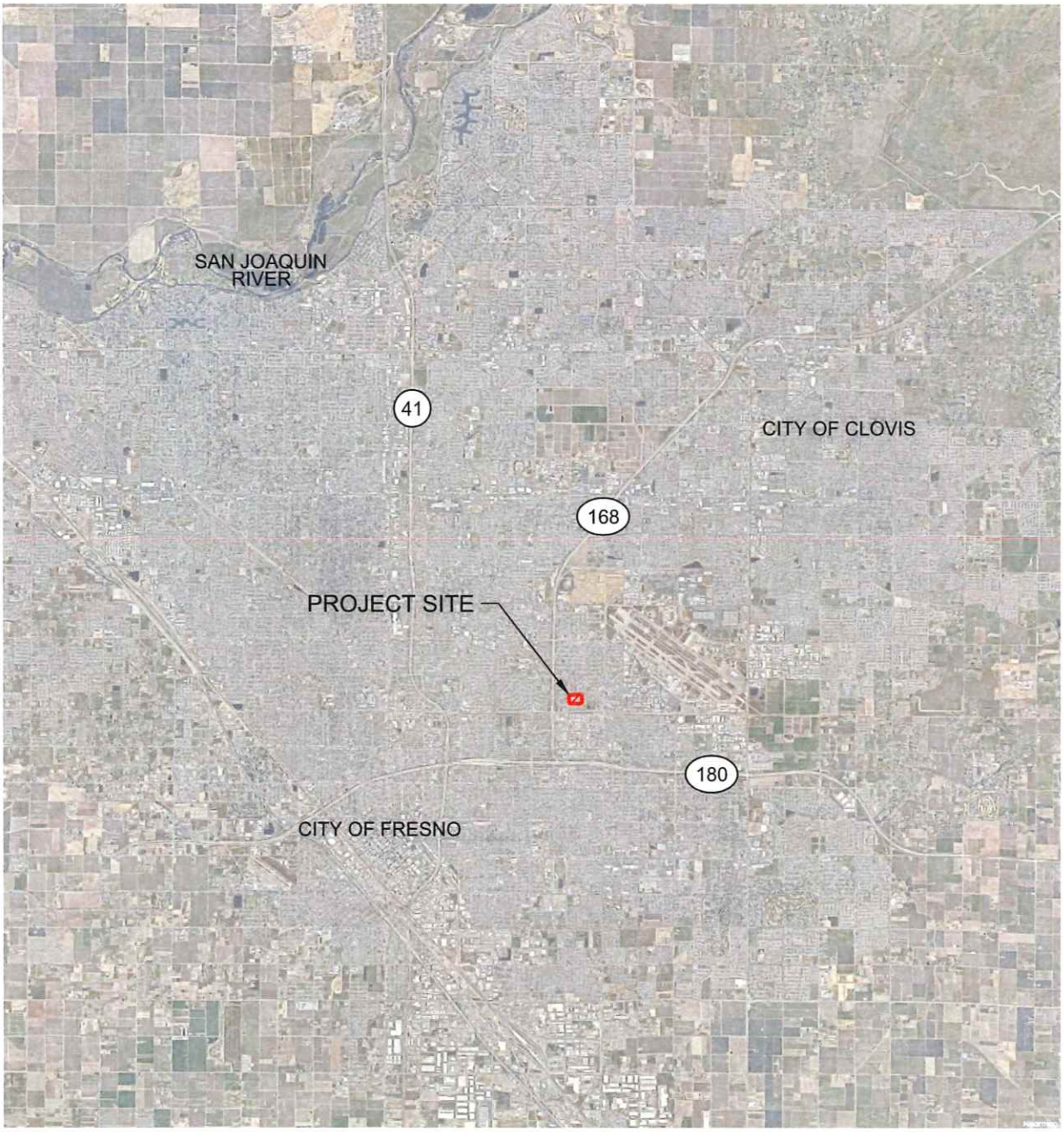
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Sincerely,



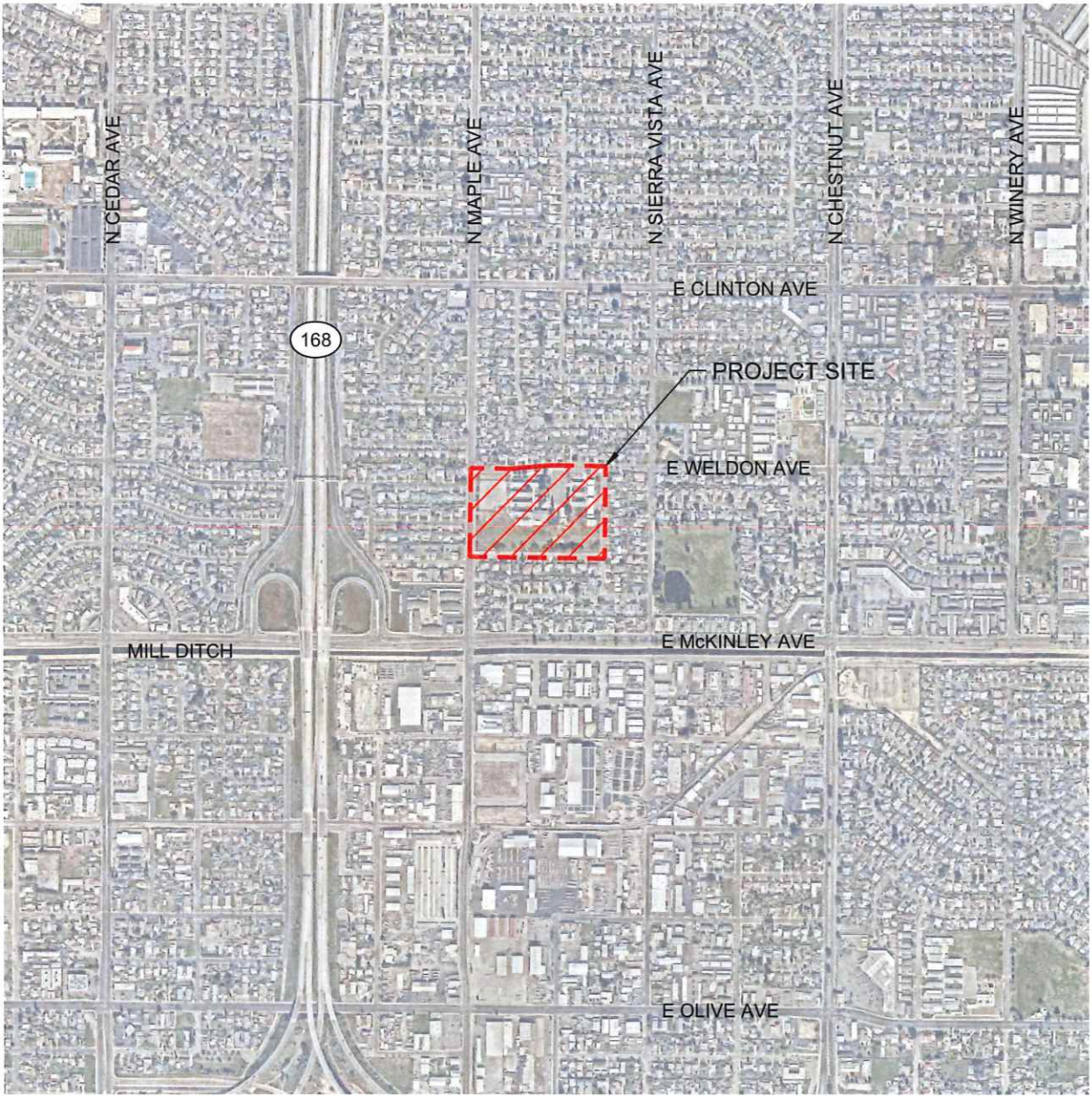
Alex Belanger
Chief Executive, Operational Services
Fresno Unified School District

Figure 1: Location Map



LOCATION MAP
NOT TO SCALE

Figure 1: Vicinity Map



VICINITY MAP
NOT TO SCALE

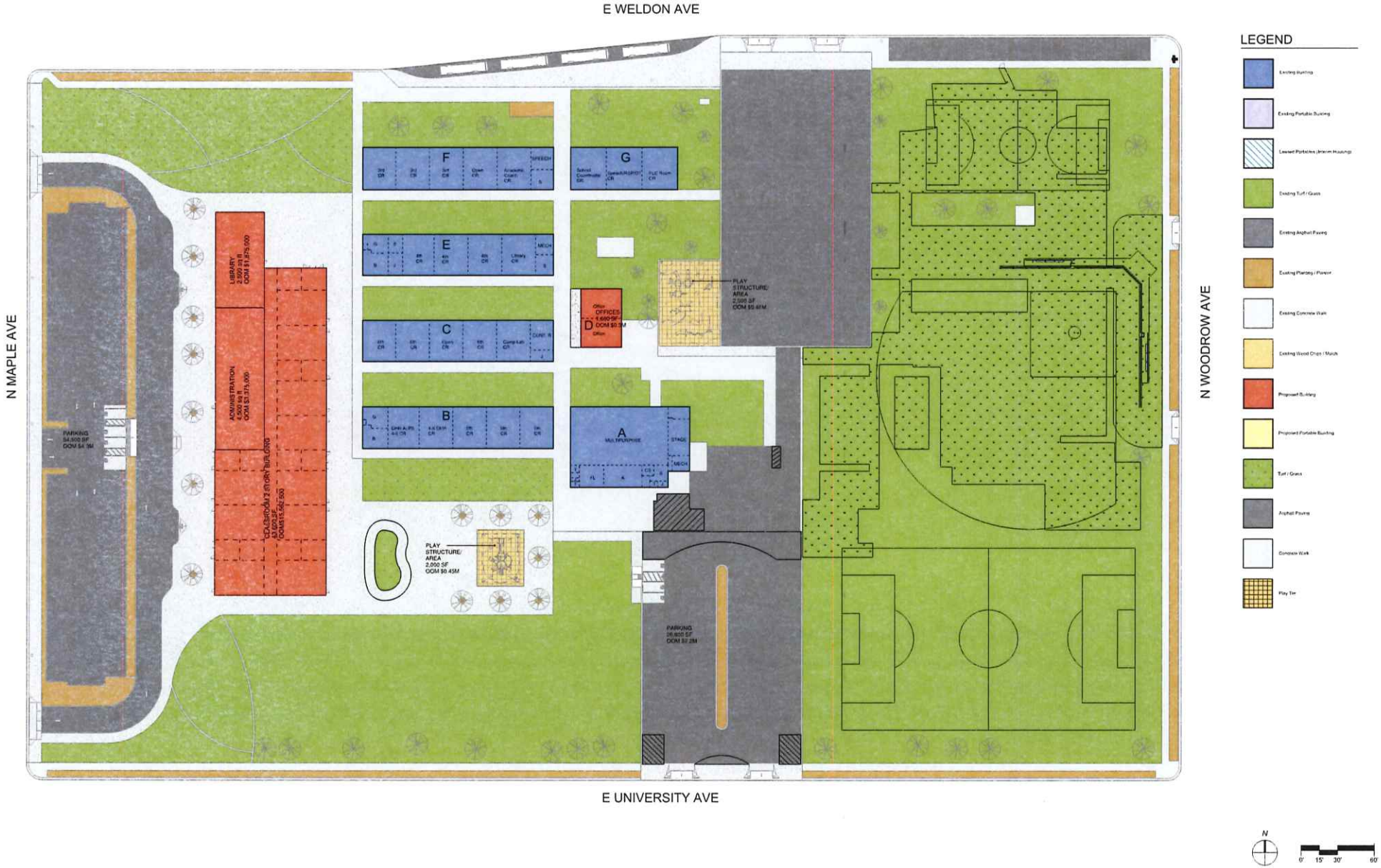
Figure 2: Project Area of Potential Effect (APE) Map



Figure 4: Existing Site Map



Figure 5: Proposed Conceptual Site Plan



Fresno Unified School District
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Keshia Thomas
Susan Wittrup

SUPERINTENDENT
Mao Misty Her

November 14, 2025

Michelle Heredia-Cordova, Chairperson
Table Mountain Rancheria
P.O. Box 410
Friant, CA 93626

Re: Invitation for Formal Tribal Consultation - Norseman Elementary School Modernization Project

Dear Chairperson Michelle Heredia-Cordova,

The Fresno Unified School District (District) is proposing to implement the Norseman Elementary School Modernization Project ("Project") in Fresno, California. The District is preparing an Initial Study to evaluate potential environmental impacts of the Project pursuant to the California Environmental Quality Act (CEQA) (Public Resources Code §21080 et seq.).

In accordance with Assembly Bill 52 (AB 52), the District respectfully invites the Table Mountain Rancheria to consult on the Project. The purpose of consultation is to identify tribal cultural resources that may be present within the Project area and that may have religious or cultural significance to your Tribe. Should such resources be identified, the District wishes to work collaboratively with your Tribe to discuss methods to avoid, minimize, or mitigate potential adverse effects.

Project Location

The Project site is located at 4636 E. Weldon Avenue, Fresno, CA 93703, within Section 25, Township 13 South, Range 20 East, at approximately 36° 46′ 5.0″ N, 119° 44′ 35.6″ W.
The Area of Potential Effect (APE) encompasses approximately 15.19 acres at the existing Norseman Elementary School campus (APNs 447-280-01T and 447-280-18T).
A Location Map, Vicinity Map, and APE Map are included as Figures 1 through 3.

Project Description

The District proposes to modernize the existing Norseman Elementary School campus using Measure H bond funds. The Project would construct a new two-story, approximately 43,600-square-foot classroom, library, and administration building, and would complete associated campus reconfigurations.

Existing portable classrooms and permanent buildings constructed in 1956 that have exceeded their useful life would be demolished. These facilities no longer meet current building code, accessibility, or educational

standards. The Project's purpose is to replace outdated facilities with modern, safe, and efficient learning environments that meet current Title 24 and Division of the State Architect (DSA) standards.

Construction Phasing and Schedule

Construction would occur in multiple phases to maintain school operations throughout implementation. Work is anticipated from March 2027 through August 2030 and would generally include:

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The existing campus totals approximately 68,000 gross square feet (GSF). The Project would demolish roughly 34,000 GSF and construct approximately 45,200 GSF of new building space, resulting in a modernized campus of about 79,100 GSF.

All new facilities and site improvements would comply with the California Building Standards Code (Title 24, CCR) and DSA requirements for energy and water efficiency, indoor environmental quality, accessibility, seismic and fire safety, and drought-tolerant landscaping.

Utilities and Infrastructure

- Water and Sewer: City of Fresno

- Storm Drainage: Fresno Metropolitan Flood Control District (FMFCD)
- Electricity: Pacific Gas and Electric Company (PG&E)
- Telecommunications/Gas: Existing utility providers within Maple and Weldon Avenue rights-of-way

Consultation Invitation

If your Tribe wishes to engage in consultation on this Project, please notify the District within 30 days of receiving this letter. In your response, please identify your Tribe's designated representative for consultation and provide their contact information. If you do not wish to consult, please let us know for our records.

Please direct your response or any questions to:

Alex Belanger
Chief Executive, Operational Services
Fresno Unified School District
Email: William.Belanger@fresnounified.org
Phone: (559) 867-8200

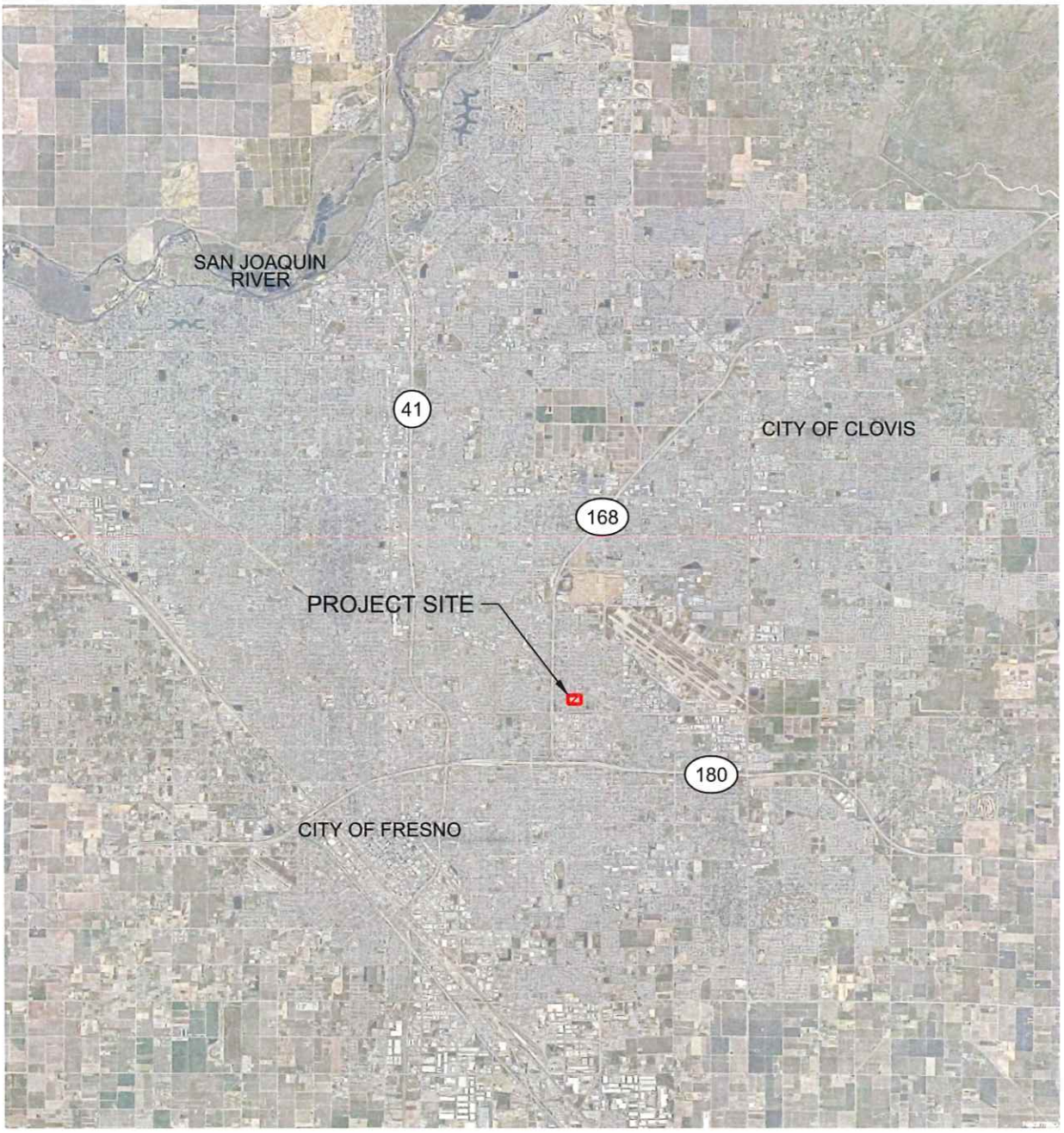
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Alex Belanger
Chief Executive, Operational Services
Fresno Unified School District

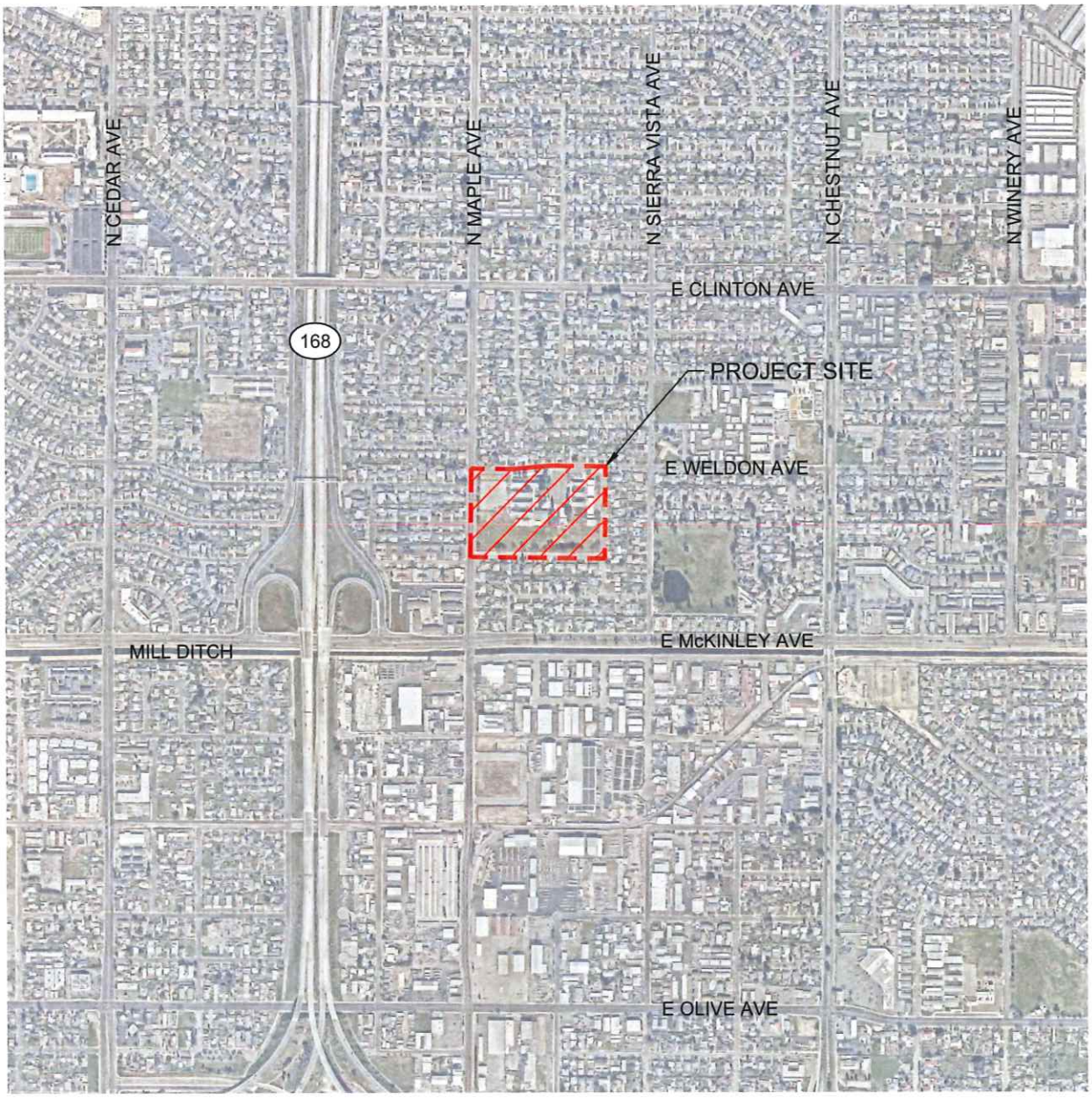
Figure 1: Location Map



LOCATION MAP
NOT TO SCALE

N

Figure 1: Vicinity Map



VICINITY MAP
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Figure 5: Proposed Conceptual Site Plan

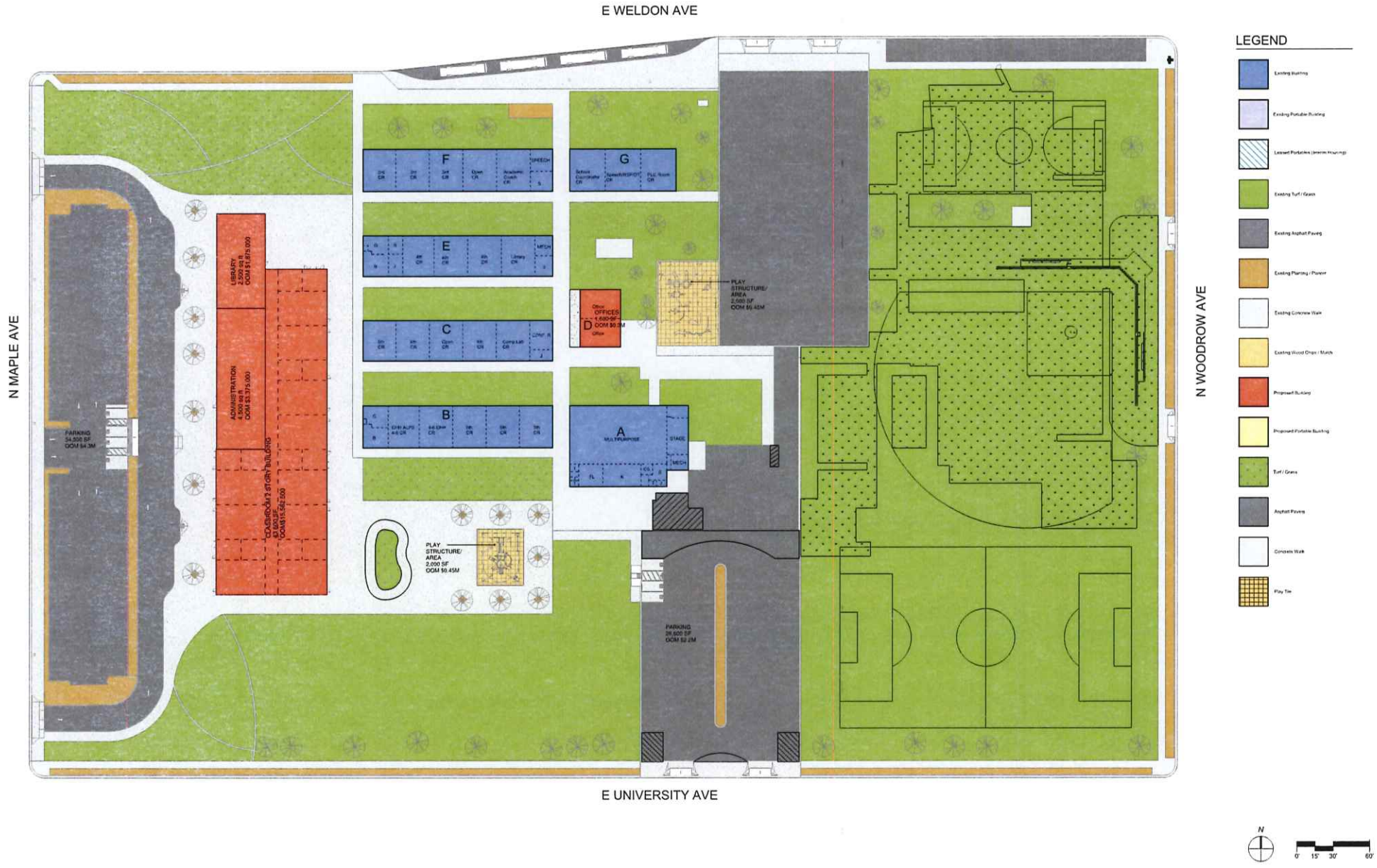


TABLE MOUNTAIN RANCHERIA
TRIBAL GOVERNMENT OFFICE

December 29, 2025

Alex Belanger, Chief Executive
Operational Services
Fresno Unified School District
2309 Tulare Street
Fresno, CA 93721

RE: Norseman Elementary School Modernization Project proposing to construct a new two-story, 43,600-square foot classroom, library, administration building, and campus reconfigurations in the City of Fresno, Fresno County, California.

To: Alex Belanger,

This is in response to your letter dated November 14, 2025, regarding Norseman Elementary School Modernization Project proposing to construct a new two-story, 43,600-square foot classroom, library, administration building, and campus reconfigurations in the City of Fresno, Fresno County, California. Thank you for notifying us of the potential development and the request for consultation.

We decline participation at this time but would appreciate being notified in the unlikely event that cultural resources are identified.

Sincerely,

Robert Pennell
Tribal Cultural Resources Director
rpennell@tmr.org
559.325.0351

Michelle Heredia-Cordova
Tribal Chairperson

Richard L. Jones
Tribal Vice-Chairperson

Jenna Gosselaar
Tribal Secretary/Treasurer

Samantha Toles-Rodriguez
Tribal Council Member-At-Large

Mark Martinez
Tribal Council Member-At-Large

23736
Sky Harbour Road
Post Office
Box 410
Friant
California
93626
(559) 822-2587
Fax
(559) 822-2693

Fresno Unified School District
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Keshia Thomas
Susan Wittrup

SUPERINTENDENT
Mao Misty Her

November 14, 2025

Delia Dominguez, Chairperson
Kitanemuk & Yowlumne Tejon Indians
115 Radio Street
Bakersfield, CA 93305

Re: Invitation for Formal Tribal Consultation - Norseman Elementary School Modernization Project

Dear Chairperson Delia Dominguez,

The Fresno Unified School District (District) is proposing to implement the Norseman Elementary School Modernization Project ("Project") in Fresno, California. The District is preparing an Initial Study to evaluate potential environmental impacts of the Project pursuant to the California Environmental Quality Act (CEQA) (Public Resources Code §21080 et seq.).

In accordance with Assembly Bill 52 (AB 52), the District respectfully invites the Kitanemuk & Yowlumne Tejon Indians to consult on the Project. The purpose of consultation is to identify tribal cultural resources that may be present within the Project area and that may have religious or cultural significance to your Tribe. Should such resources be identified, the District wishes to work collaboratively with your Tribe to discuss methods to avoid, minimize, or mitigate potential adverse effects.

Project Location

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Consultation Invitation

If your Tribe wishes to engage in consultation on this Project, please notify the District within 30 days of receiving this letter. In your response, please identify your Tribe's designated representative for consultation and provide their contact information. If you do not wish to consult, please let us know for our records.

Please direct your response or any questions to:

Alex Belanger
Chief Executive, Operational Services
Fresno Unified School District
Email: William.Belanger@fresnounified.org
Phone: (559) 867-8200

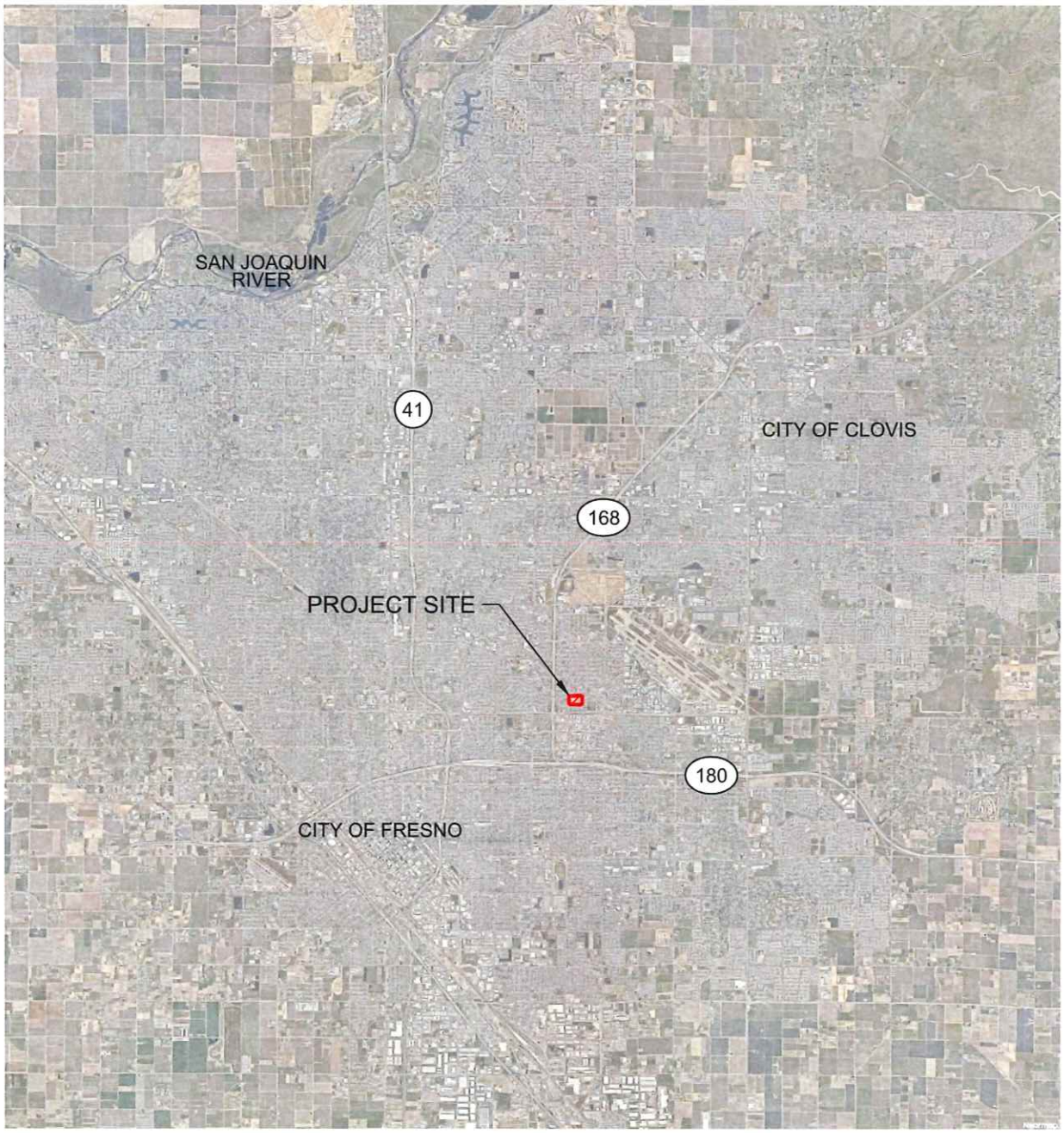
The District values your input and looks forward to your response.

Sincerely,



Alex Belanger
Chief Executive, Operational Services
Fresno Unified School District

Figure 1: Location Map



LOCATION MAP
NOT TO SCALE

Figure 1: Vicinity Map



VICINITY MAP
NOT TO SCALE

Figure 2: Project Area of Potential Effect (APE) Map

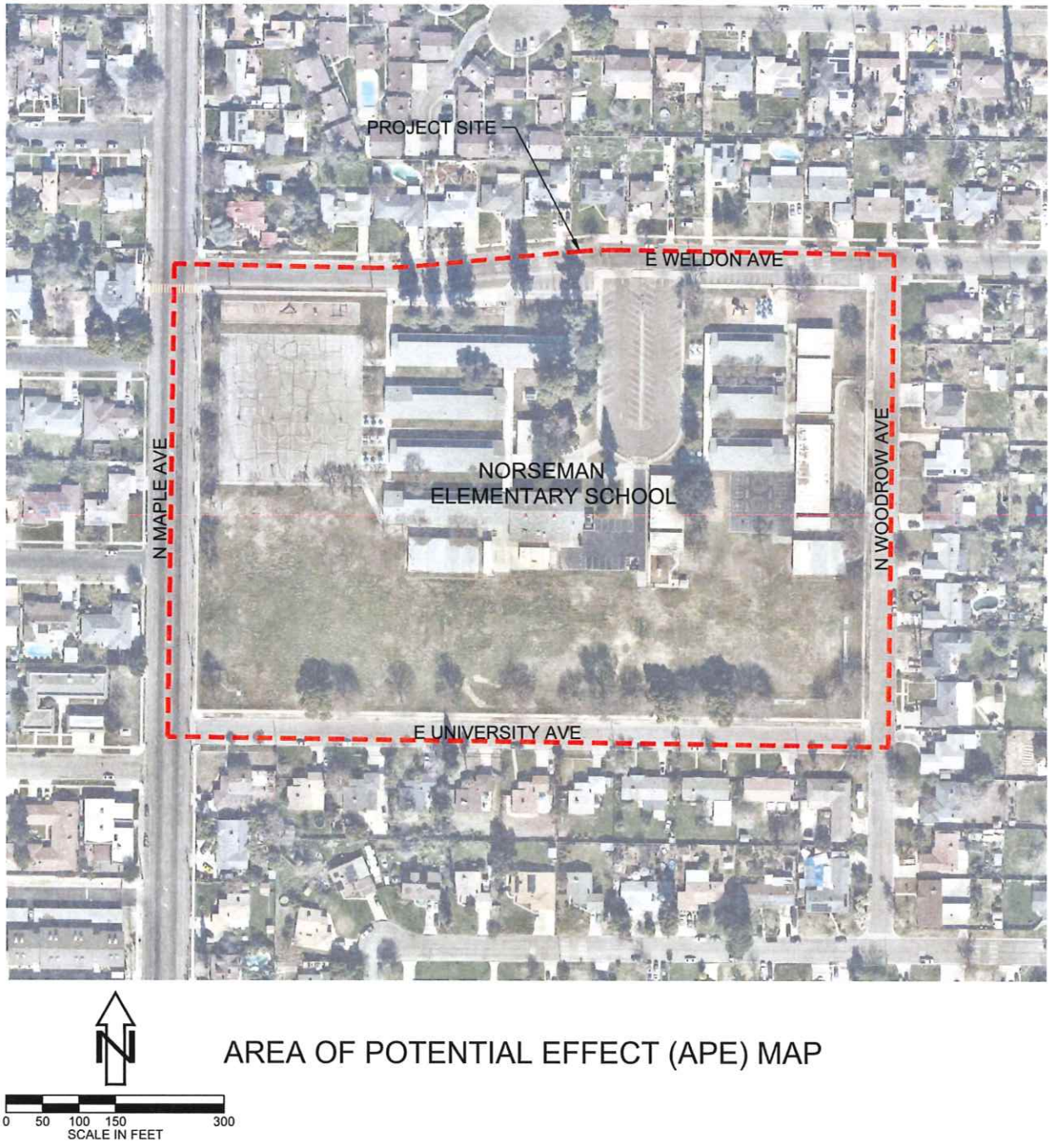
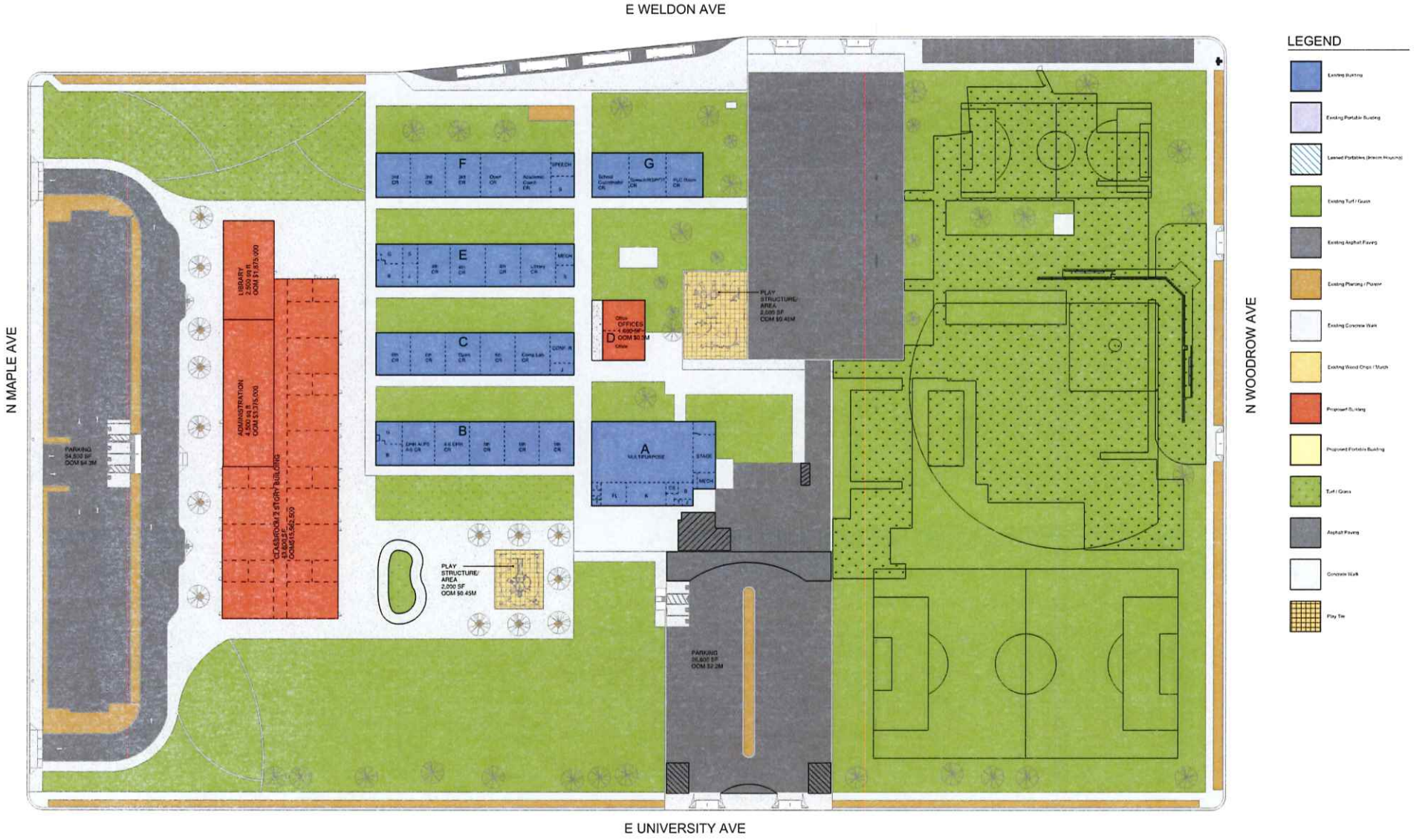


Figure 4: Existing Site Map



Figure 5: Proposed Conceptual Site Plan



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Susan Wittrup

SUPERINTENDENT
Mao Misty Her

November 14, 2025

Kerri Vera, Environmental Department
Tule River Indian Tribe
340 North Reservation Road
Porterville, CA 93257

Re: Invitation for Formal Tribal Consultation - Norseman Elementary School Modernization Project

Dear Ms. Kerri Vera,

The Fresno Unified School District (District) is proposing to implement the Norseman Elementary School Modernization Project ("Project") in Fresno, California. The District is preparing an Initial Study to evaluate potential environmental impacts of the Project pursuant to the California Environmental Quality Act (CEQA) (Public Resources Code §21080 et seq.).

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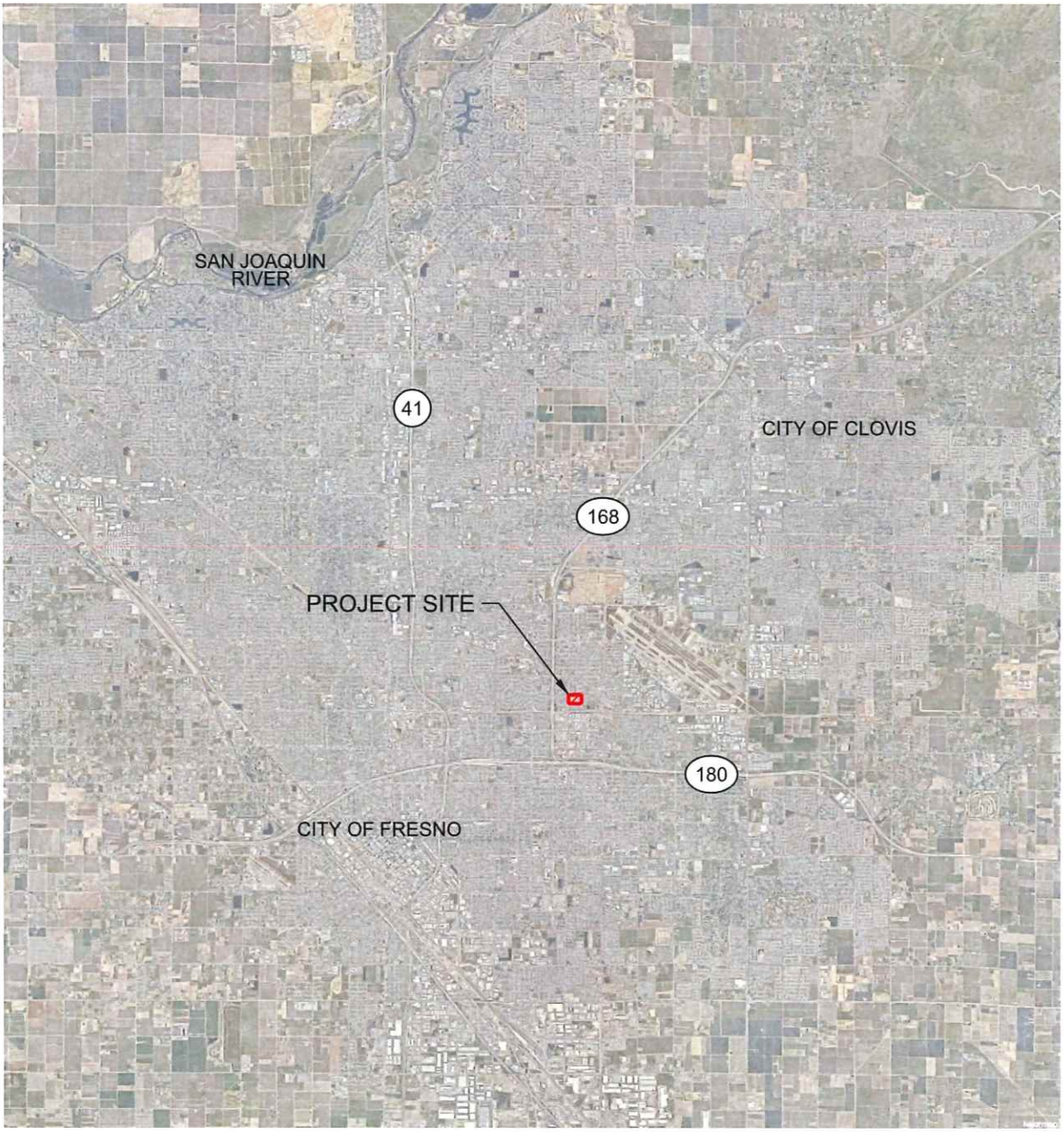
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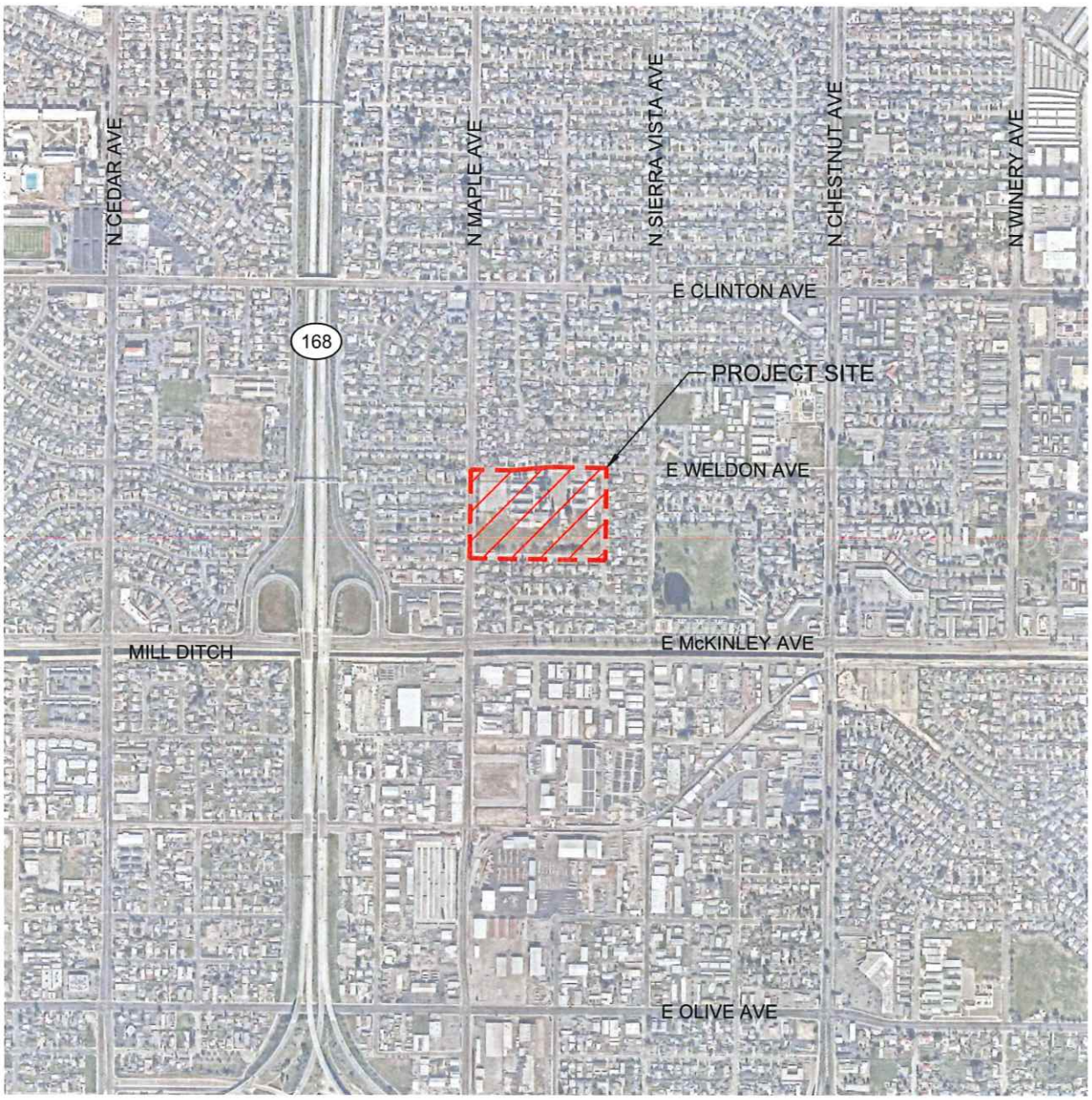
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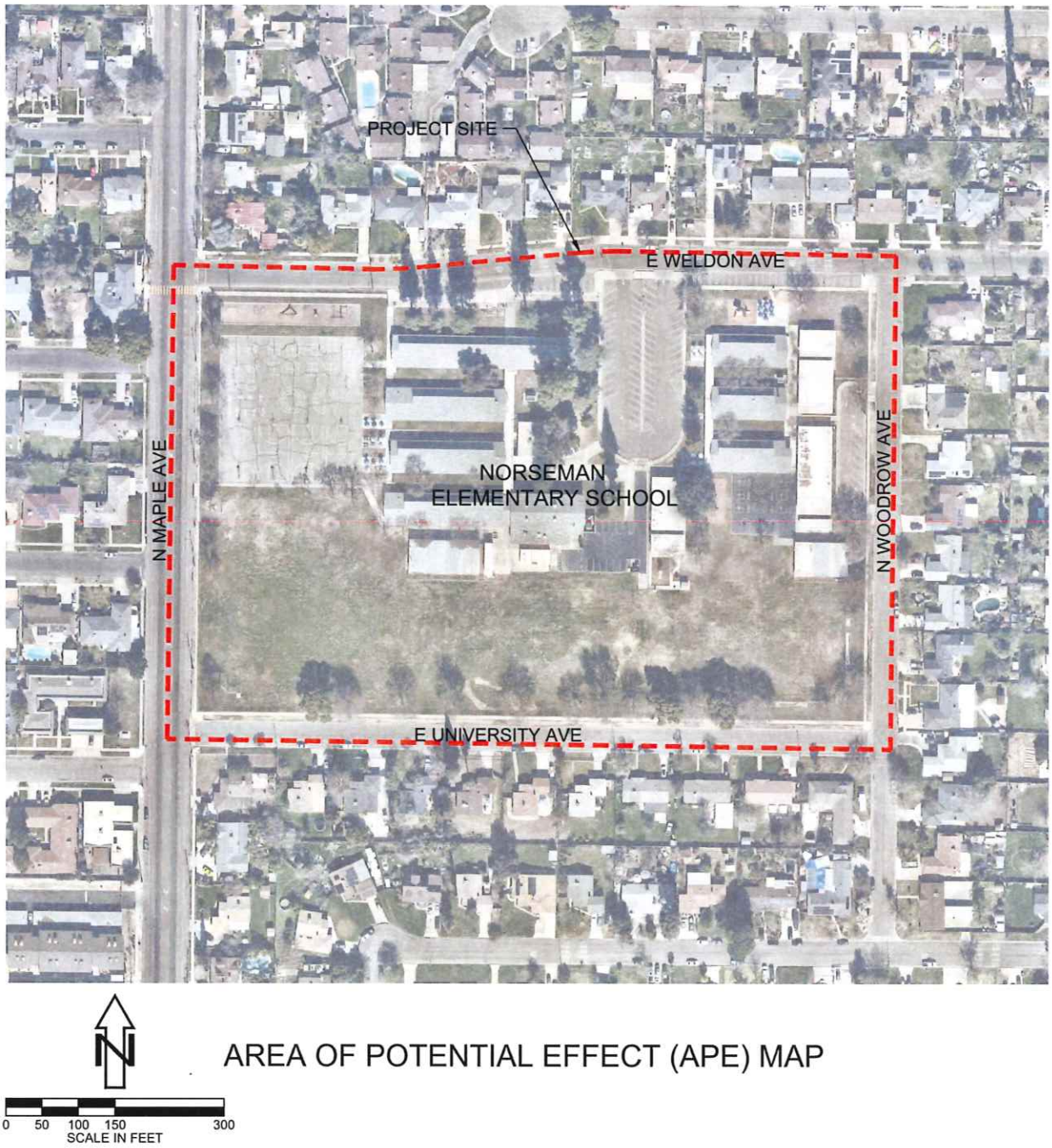
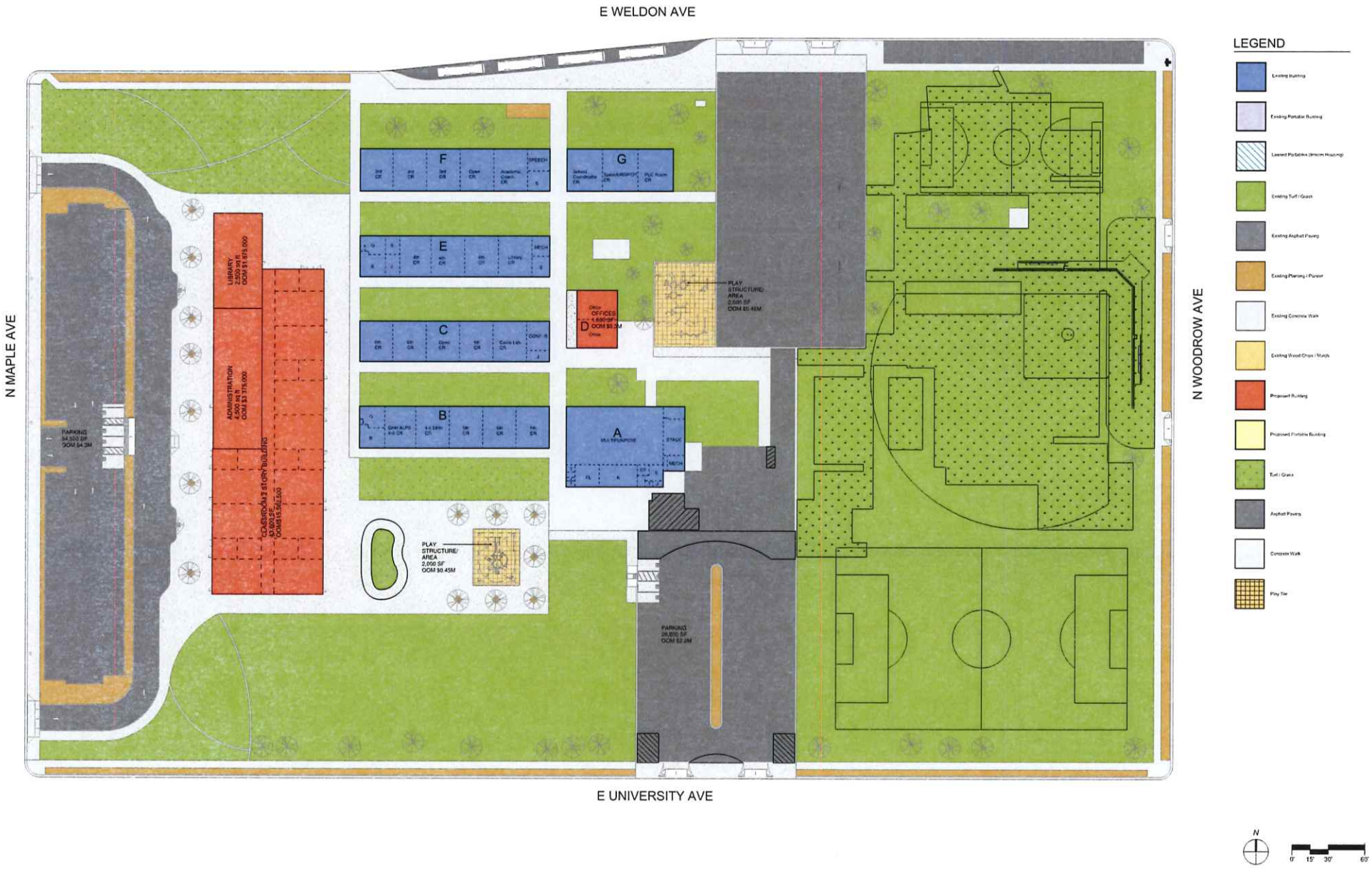


Figure 4: Existing Site Map



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SUPERINTENDENT
Mao Misty Her

November 14, 2025

Felix Christman, THPO
Tule River Indian Tribe
340 North Reservation Road
Porterville, CA 93257

Re: Invitation for Formal Tribal Consultation - Norseman Elementary School Modernization Project

Dear Mr. Felix Christman,

The Fresno Unified School District (District) is proposing to implement the Norseman Elementary School Modernization Project ("Project") in Fresno, California. The District is preparing an Initial Study to evaluate potential environmental impacts of the Project pursuant to the California Environmental Quality Act (CEQA) (Public Resources Code §21080 et seq.).

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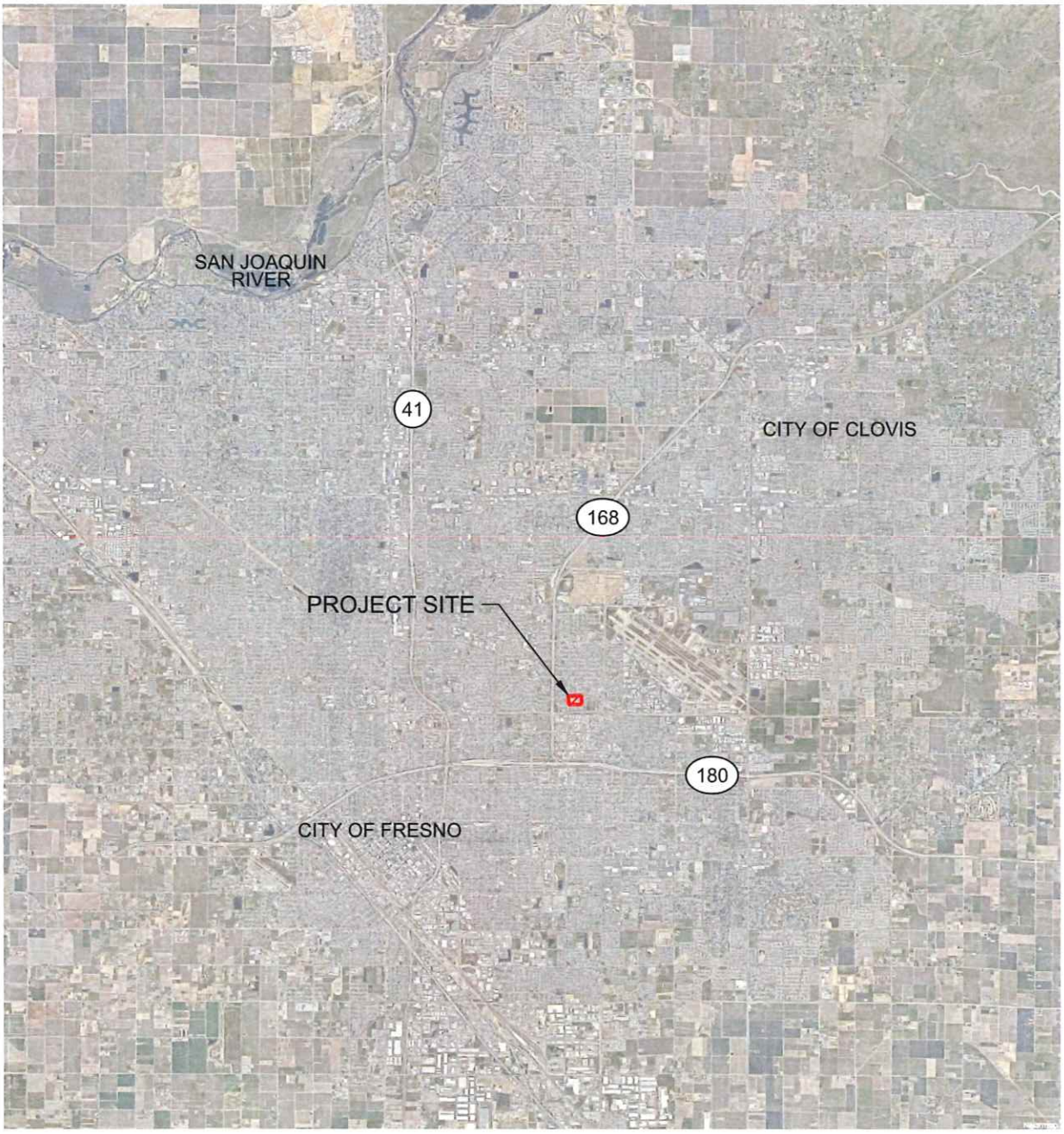
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Alex Belanger
Chief Executive, Operational Services
Fresno Unified School District

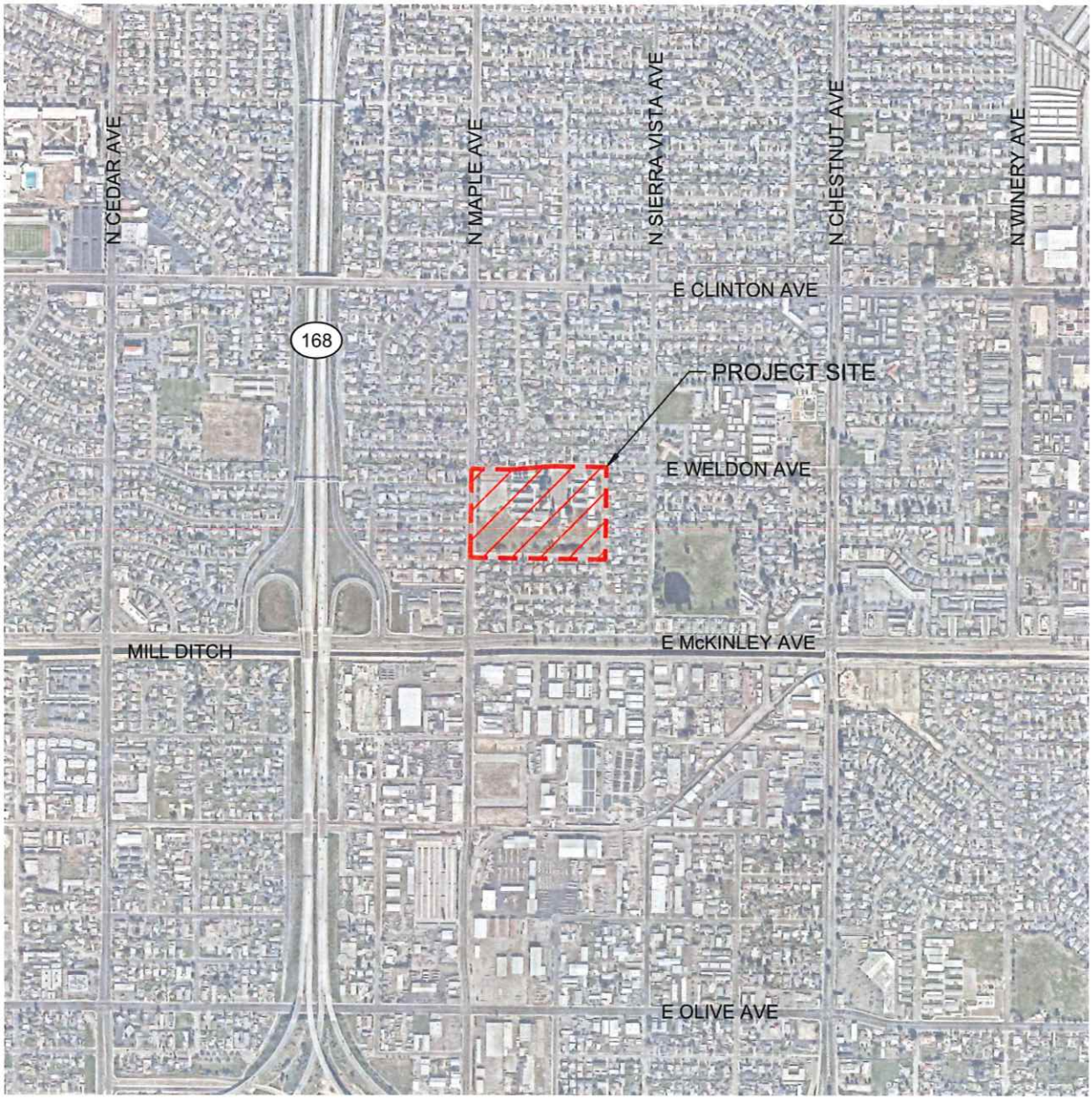
Figure 1: Location Map



LOCATION MAP
NOT TO SCALE

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Figure 1: Vicinity Map



VICINITY MAP
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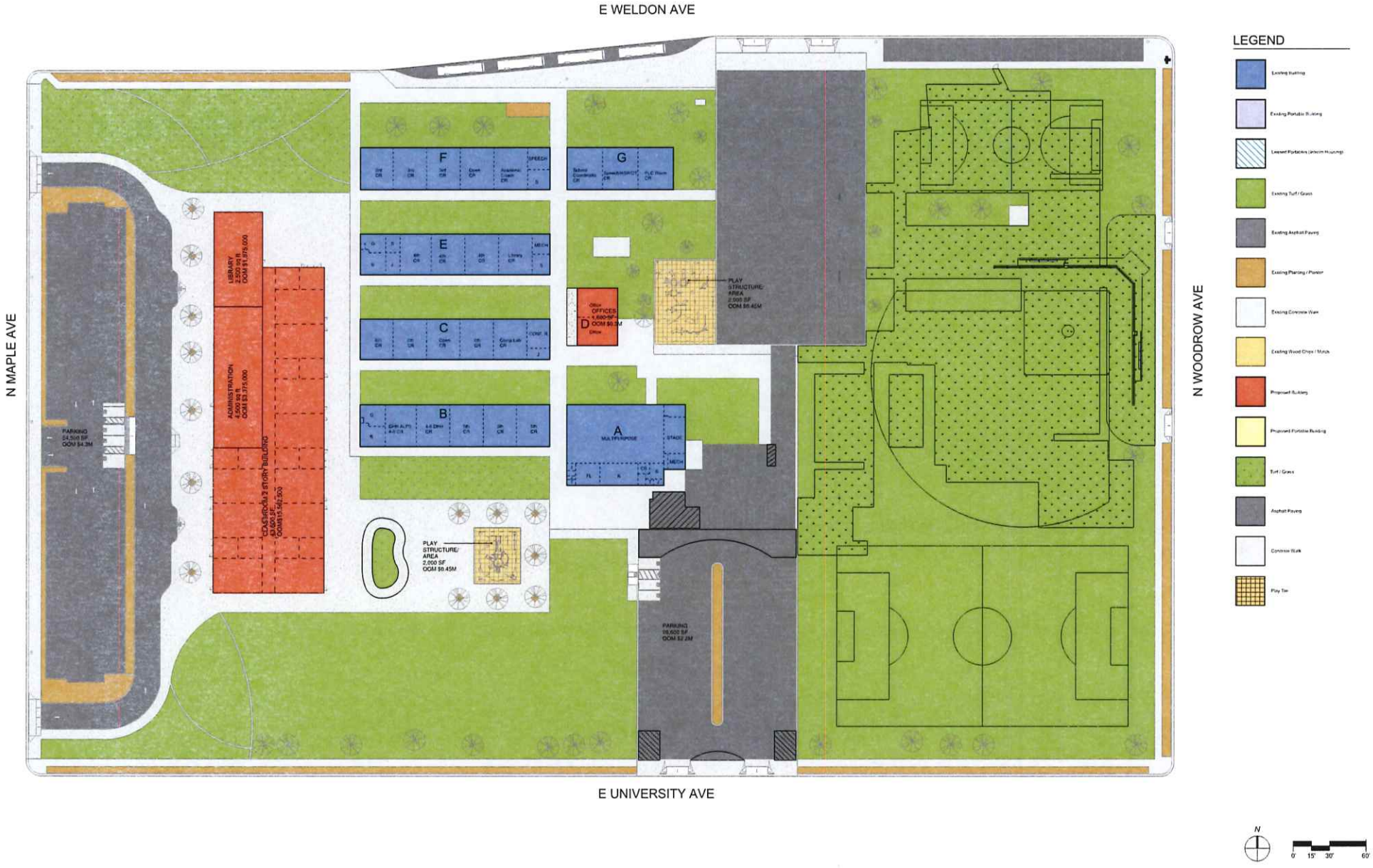
Figure 2: Project Area of Potential Effect (APE) Map



Figure 4: Existing Site Map



Figure 5: Proposed Conceptual Site Plan



Fresno Unified School District
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SUPERINTENDENT
Mao Misty Her

November 14, 2025

Kenneth Woodrow, Chairperson
Wuksachi Indian Tribe/Eshom Valley Band
1179 Rock Haven Ct.
Salinas, CA 93906

Re: Invitation for Formal Tribal Consultation - Norseman Elementary School Modernization Project

Dear Chairperson Kenneth Woodrow,

The Fresno Unified School District (District) is proposing to implement the Norseman Elementary School Modernization Project ("Project") in Fresno, California. The District is preparing an Initial Study to evaluate potential environmental impacts of the Project pursuant to the California Environmental Quality Act (CEQA) (Public Resources Code §21080 et seq.).

In accordance with Assembly Bill 52 (AB 52), the District respectfully invites the Wuksachi Indian Tribe/Eshom Valley Band to consult on the Project. The purpose of consultation is to identify tribal cultural resources that may be present within the Project area and that may have religious or cultural significance to your Tribe. Should such resources be identified, the District wishes to work collaboratively with your Tribe to discuss methods to avoid, minimize, or mitigate potential adverse effects.

Project Location

The Project site is located at 4636 E. Weldon Avenue, Fresno, CA 93703, within Section 25, Township 13 South, Range 20 East, at approximately 36° 46′ 5.0″ N, 119° 44′ 35.6″ W.
The Area of Potential Effect (APE) encompasses approximately 15.19 acres at the existing Norseman Elementary School campus (APNs 447-280-01T and 447-280-18T).
A Location Map, Vicinity Map, and APE Map are included as Figures 1 through 3.

Project Description

The District proposes to modernize the existing Norseman Elementary School campus using Measure H bond funds. The Project would construct a new two-story, approximately 43,600-square-foot classroom, library, and administration building, and would complete associated campus reconfigurations.

Existing portable classrooms and permanent buildings constructed in 1956 that have exceeded their useful life would be demolished. These facilities no longer meet current building code, accessibility, or educational

standards. The Project's purpose is to replace outdated facilities with modern, safe, and efficient learning environments that meet current Title 24 and Division of the State Architect (DSA) standards.

Construction Phasing and Schedule

Construction would occur in multiple phases to maintain school operations throughout implementation. Work is anticipated from March 2027 through August 2030 and would generally include:

1. Temporary Facilities: Install four portable classrooms on the east side of campus to accommodate students and staff during phased construction.

2. Initial Demolition: Remove west athletic fields, blacktop, play structures, ballfield backstop, 14 trees, four portable classrooms (P17–P20), and the north parking lot and bus drop-off lane along Weldon Avenue.

3. New West Campus Construction: Construct the new two-story Administration/Library/Classroom Building on the west side; install new water and sewer connections to existing mains in Maple Avenue; and construct a new west parking lot (approximately 80 stalls) with a parent drop-off loop, security lighting, tree planters, and accessible stalls. Parent traffic would be redirected from Weldon Avenue to Maple Avenue. The north bus drop-off lane would be reconstructed to expand capacity while maintaining existing operations.

4. Play Area and South Parking Lot Improvements: Replace the former 60-stall north parking lot with new play areas and play structures. Construct a new staff parking lot (approximately 59 stalls) along University Avenue, with staff and limited parent traffic redirected to the south side of the campus.

5. East Campus Demolition: Remove remaining permanent and temporary buildings on the east side, including three permanent classroom buildings (H, J, K), the existing administration office (Building D), 16 portable classrooms, four temporary portables, hardscape play areas, two play structures, five trees, and the 10-stall east parking lot.

6. Administration Office Reconstruction: Rebuild the administration office (Building D) in its current location with modernized features.

7. Athletic Field Reconstruction: Relocate and reconstruct athletic fields on the east side, including one ballfield backstop, turf play areas, and perimeter light poles with lighting directed toward the site interior.

The existing campus totals approximately 68,000 gross square feet (GSF). The Project would demolish roughly 34,000 GSF and construct approximately 45,200 GSF of new building space, resulting in a modernized campus of about 79,100 GSF.

All new facilities and site improvements would comply with the California Building Standards Code (Title 24, CCR) and DSA requirements for energy and water efficiency, indoor environmental quality, accessibility, seismic and fire safety, and drought-tolerant landscaping.

Utilities and Infrastructure

- Water and Sewer: City of Fresno

- Storm Drainage: Fresno Metropolitan Flood Control District (FMFCD)
- Electricity: Pacific Gas and Electric Company (PG&E)
- Telecommunications/Gas: Existing utility providers within Maple and Weldon Avenue rights-of-way

Consultation Invitation

If your Tribe wishes to engage in consultation on this Project, please notify the District within 30 days of receiving this letter. In your response, please identify your Tribe's designated representative for consultation and provide their contact information. If you do not wish to consult, please let us know for our records.

Please direct your response or any questions to:

Alex Belanger
Chief Executive, Operational Services
Fresno Unified School District
Email: William.Belanger@fresnounified.org
Phone: (559) 867-8200

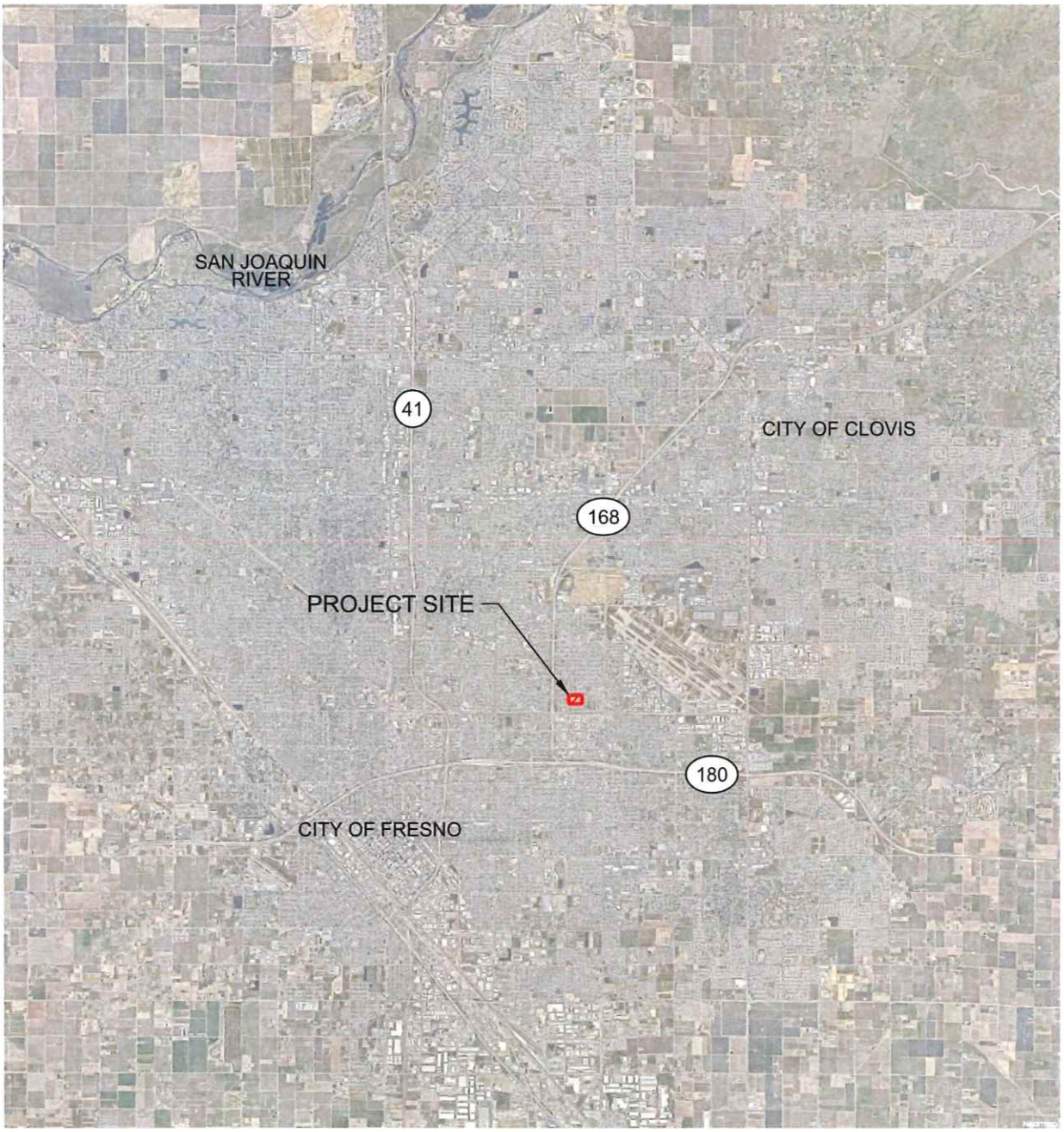
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Sincerely,



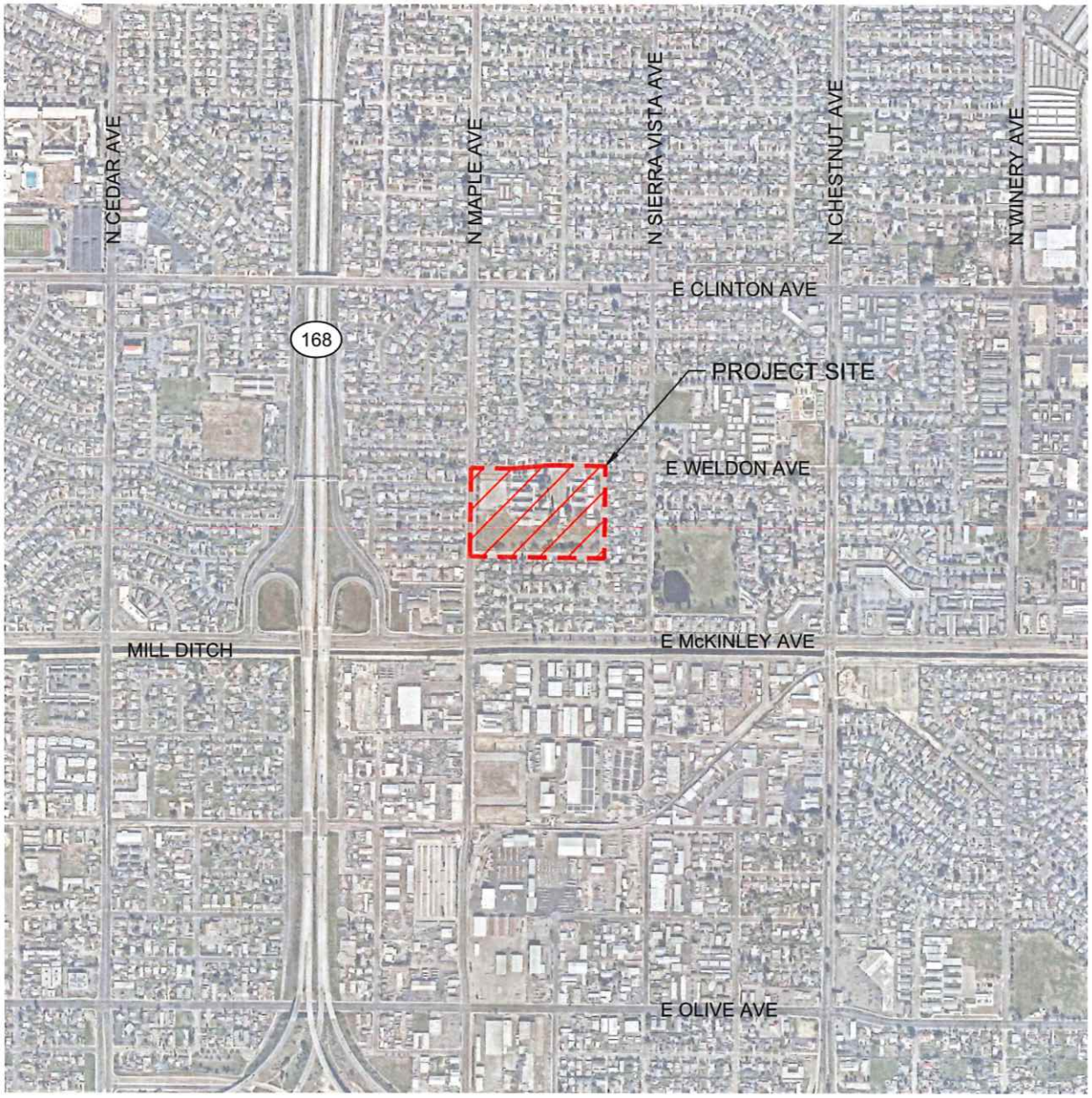
Alex Belanger
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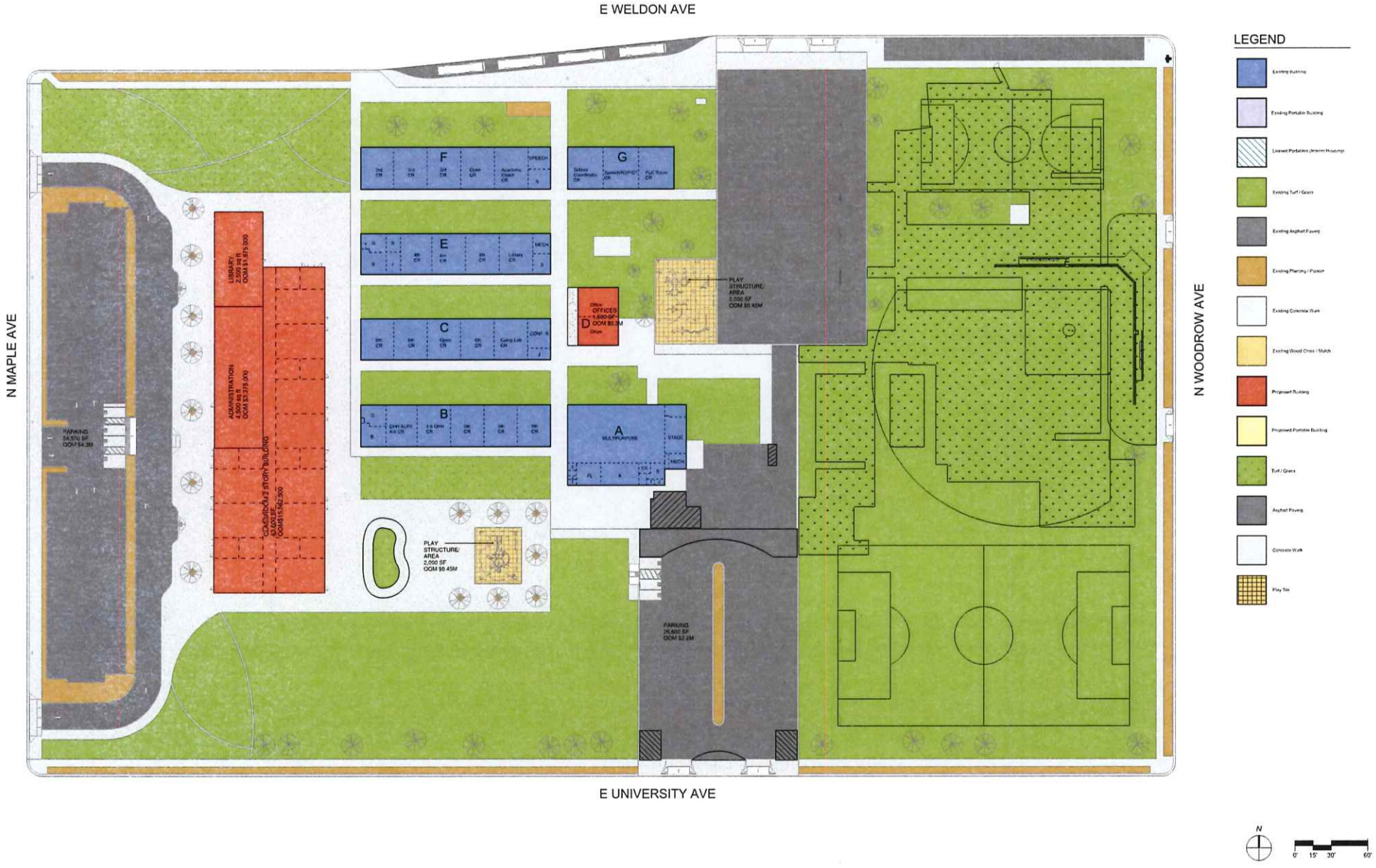
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Mao Misty Her

November 14, 2025

Katherine Perez, Chairperson
Northern Valley Yokut / Ohlone Tribe
P.O. Box 717
Linden, CA 95236

Re: Invitation for Formal Tribal Consultation - Norseman Elementary School Modernization Project

Dear Chairperson Katherine Perez,

The Fresno Unified School District (District) is proposing to implement the Norseman Elementary School Modernization Project ("Project") in Fresno, California. The District is preparing an Initial Study to evaluate potential environmental impacts of the Project pursuant to the California Environmental Quality Act (CEQA) (Public Resources Code §21080 et seq.).

In accordance with Assembly Bill 52 (AB 52), the District respectfully invites the Northern Valley Yokut / Ohlone Tribe to consult on the Project. The purpose of consultation is to identify tribal cultural resources that may be present within the Project area and that may have religious or cultural significance to your Tribe. Should such resources be identified, the District wishes to work collaboratively with your Tribe to discuss methods to avoid, minimize, or mitigate potential adverse effects.

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Fresno Unified School District
Email: William.Belanger@fresnounified.org
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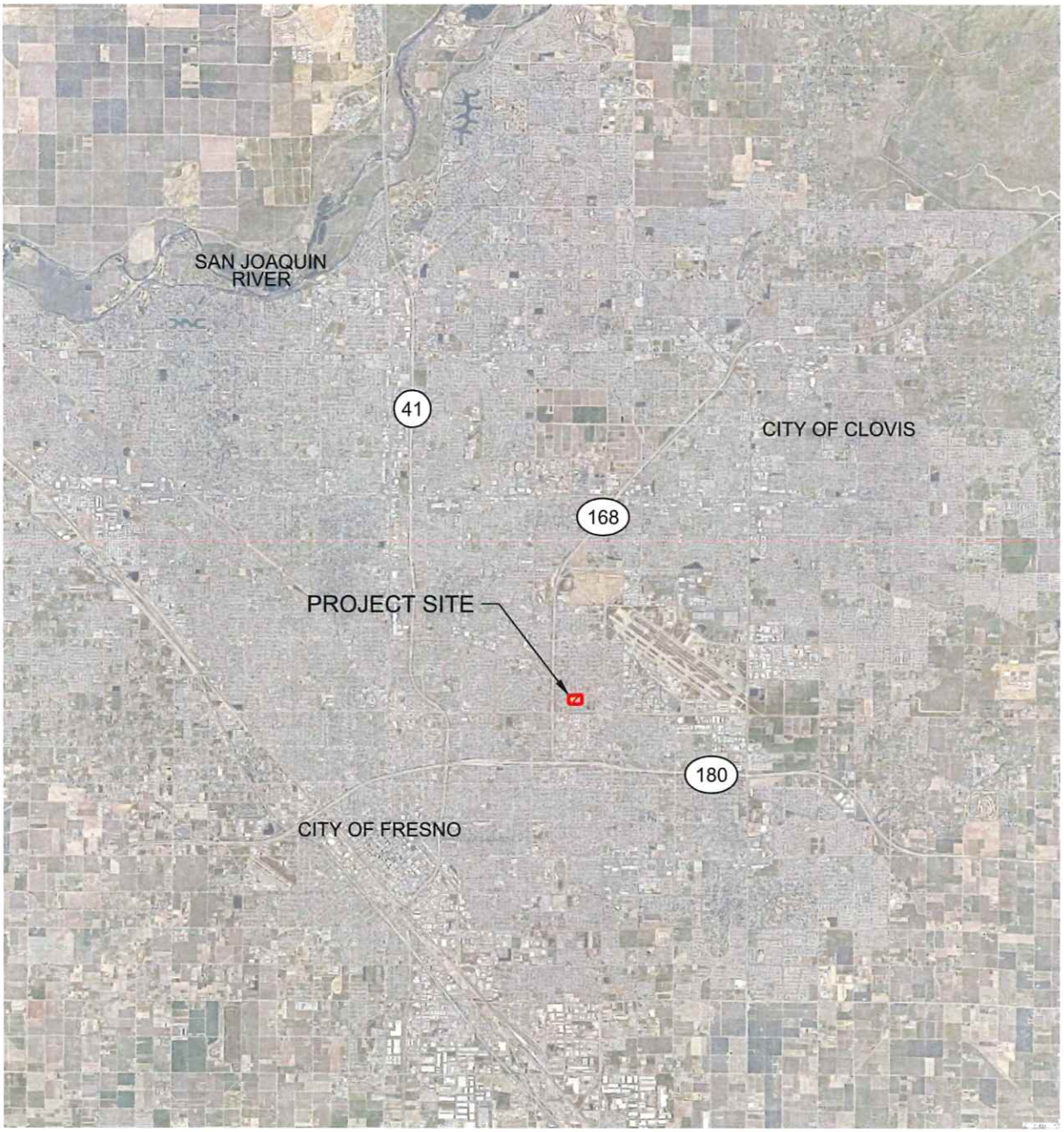
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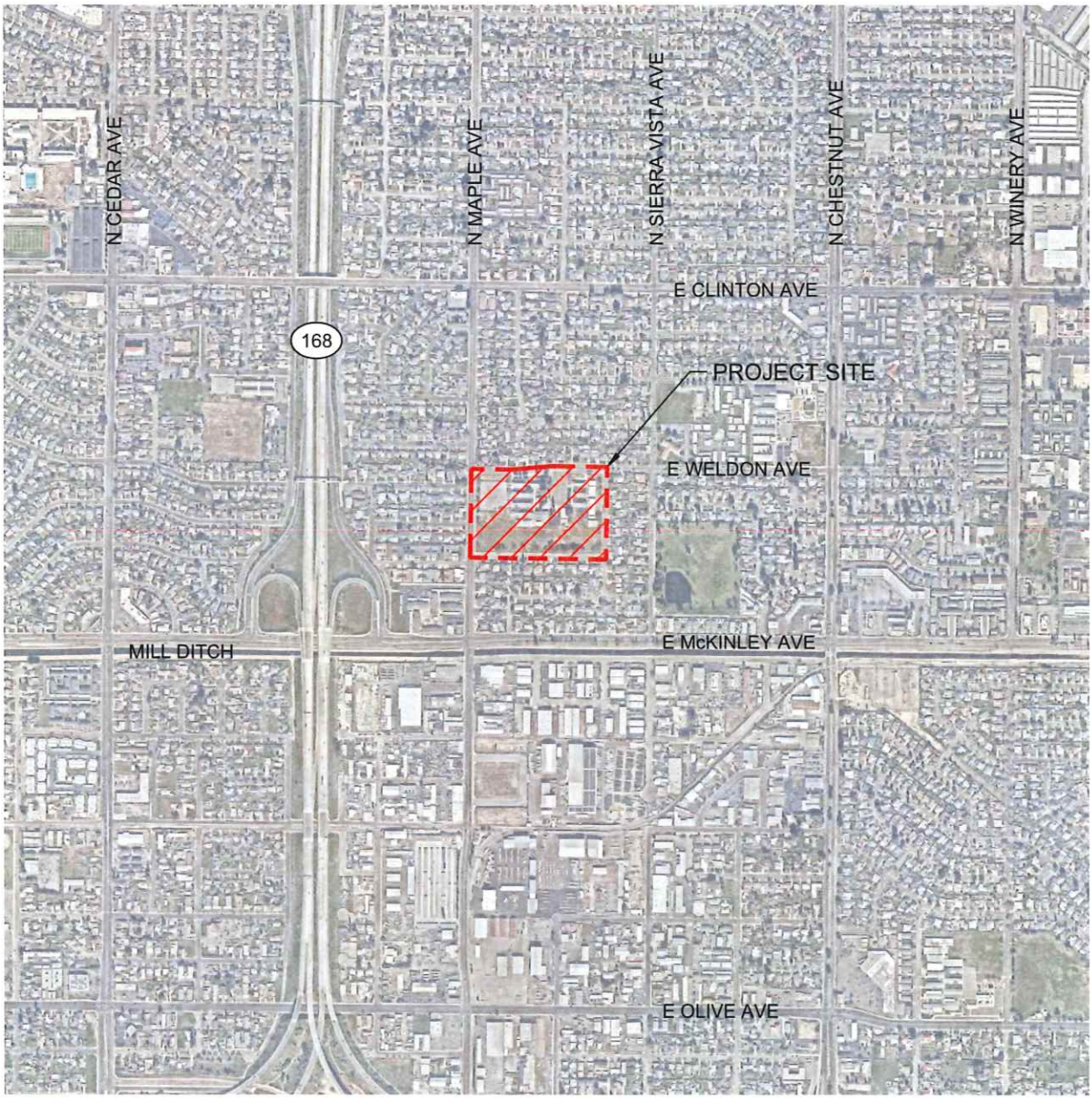
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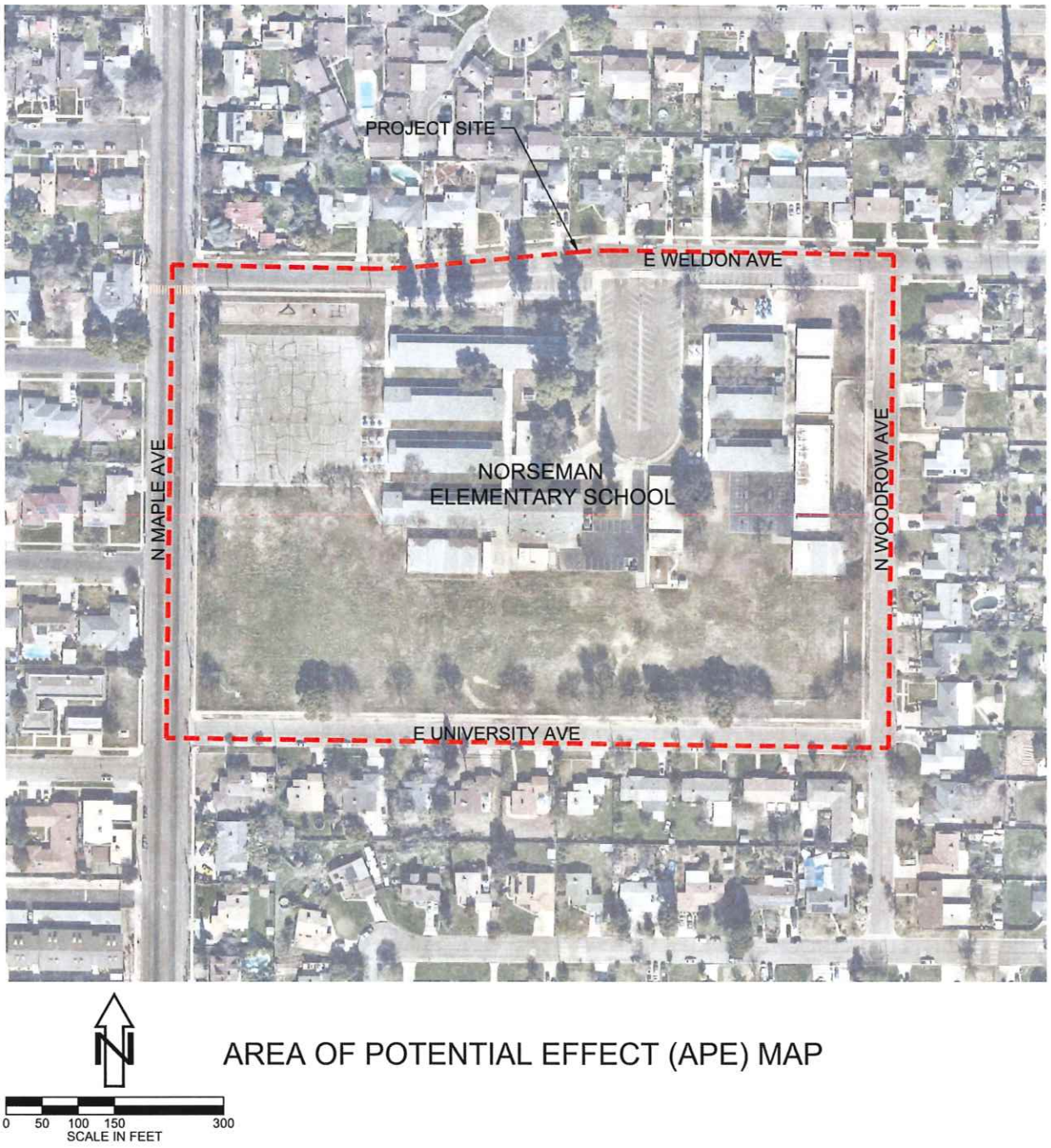
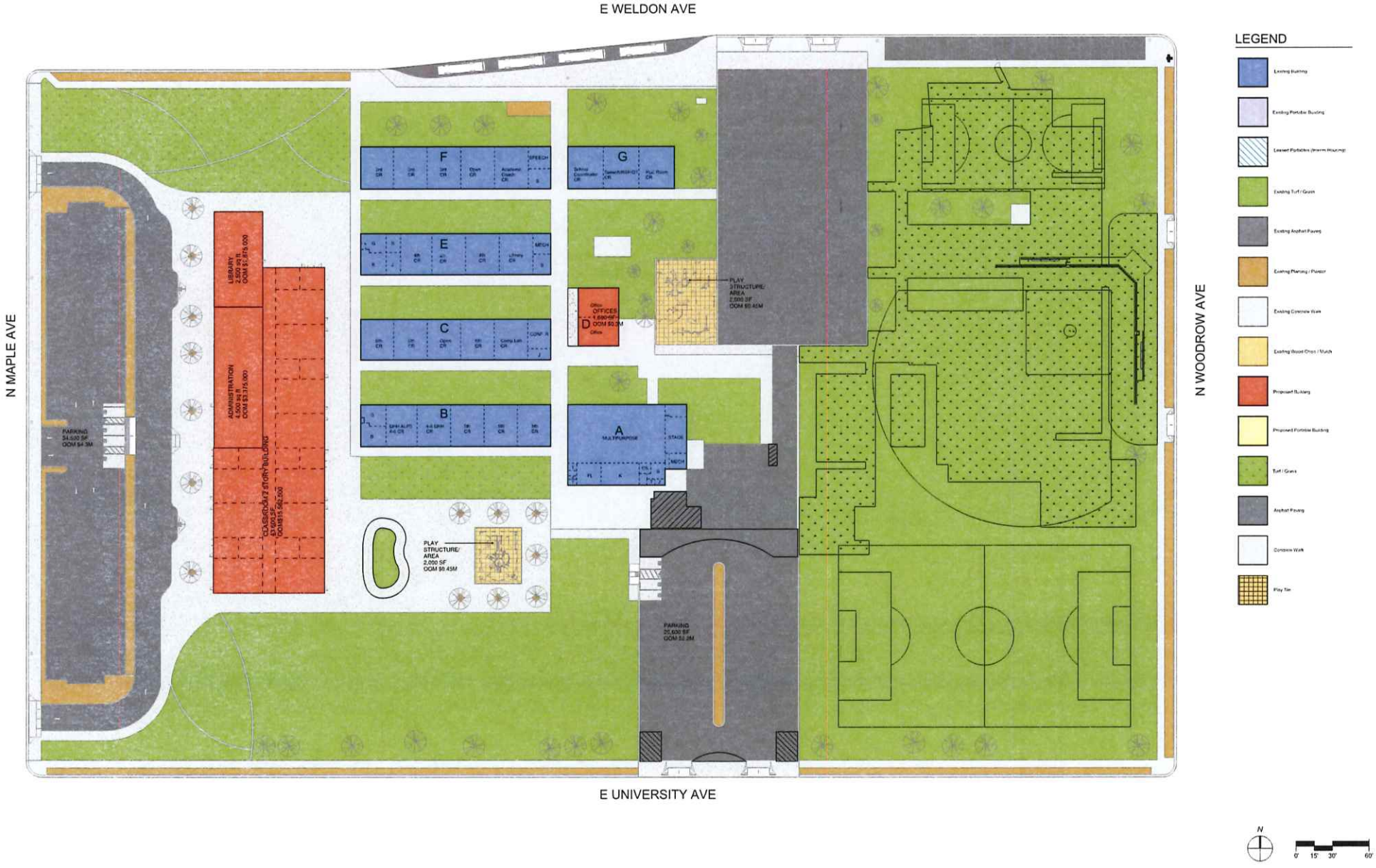


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November 14, 2025

Timothy Perez, Tribal Compliance Officer
Northern Valley Yokut / Ohlone Tribe
P.O. Box 717
Linden, CA 95236

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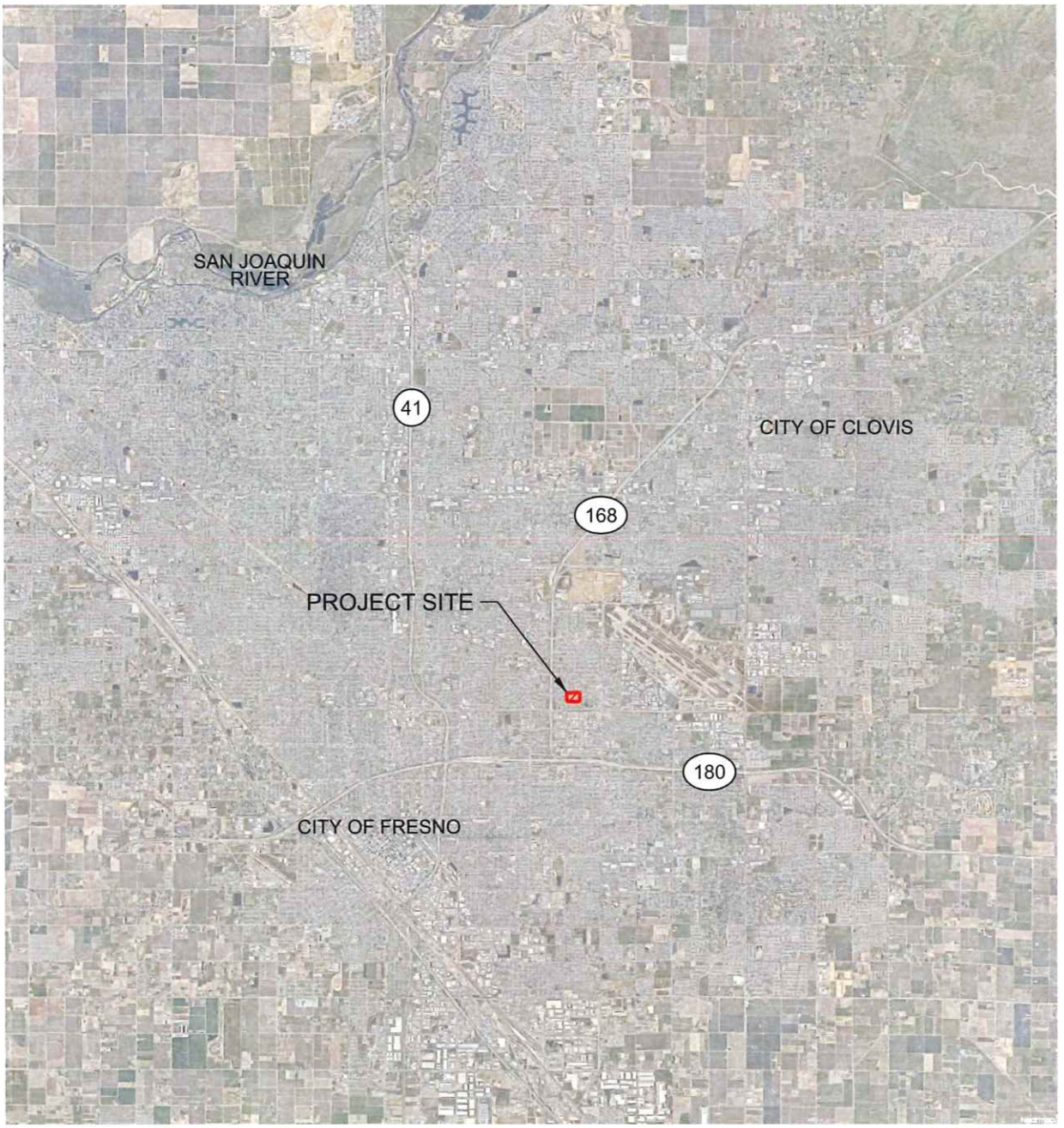
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Alex Belanger
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Figure 1: Vicinity Map



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Figure 2: Project Area of Potential Effect (APE) Map



Figure 4: Existing Site Map



Figure 5: Proposed Conceptual Site Plan

