



County of Fresno

DEPARTMENT OF PUBLIC WORKS AND PLANNING
STEVEN E. WHITE, DIRECTOR

EVALUATION OF ENVIRONMENTAL IMPACTS

APPLICANT: The Towers, LLC (Phoebe Moffett, Assurance Development, Representative)

APPLICATION NOS.: Initial Study No. 8896 and Unclassified Conditional Use Permit No. 3851

DESCRIPTION: Allow an 80-foot-tall unmanned wireless telecommunications monopine facility and related antennas, ground-mounted equipment, backup generator, utilities, and associated improvements within a 50-foot by 50-foot fenced lease area on an approximately 8-acre parcel within the M-1 (Light Manufacturing) Zone District.

LOCATION: The subject parcel is located on Marty Avenue approximately 55 feet south of the intersection of West Mount Whitney Avenue and Marty Avenue, within the unincorporated community of Riverdale (APN 053-380-35S) (Sup. Dist. 4). The assigned address for the proposed wireless facility is 21083 Marty Avenue, Riverdale, CA 93656.

AESTHETICS

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

- A. Have a substantial adverse effect on a scenic vista; or
- B. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

FINDING: NO IMPACT:

The project proposes an 80-foot-tall wireless telecommunications facility within a 50-foot by 50-foot fenced lease area on a previously disturbed portion of an industrially designated and M-1-zoned parcel. Figure OS-L.1 of the Fresno County General Plan does not identify a scenic roadway fronting the project site. The project would not remove or damage trees, rock outcroppings, historic buildings, or other identified scenic resources within a State scenic highway. Although the tower would introduce a new

vertical feature, the project would not substantially adversely affect a designated scenic vista or scenic resource.

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

FINDING: LESS THAN SIGNIFICANT IMPACT WITH MITIGATION:

The project site is located at the western edge of the disadvantaged community of Riverdale in an area containing industrial, residential, and agricultural uses. Existing development on the subject parcel includes an older wood-frame building, multiple industrial storage/shop structures and open-sided canopies, trailers/containers, and outdoor vehicle/equipment/material storage. Public views of the proposed tower would be available from Marty Avenue, West Mount Whitney Avenue, and nearby properties. With implementation of Mitigation Measures 1 and 2 requiring screened ground equipment and an 80-foot monopine design, the project would not substantially degrade the existing visual character or quality of public views of the site or its surroundings.

Mitigation Measure(s)

1. *Ground equipment for the telecommunication tower shall be screened from view behind slatted fencing utilizing a non-reflective or earth-tone color and shall be located and designed to reasonably minimize their visual impact on the surrounding area.*
 2. *The telecommunications tower shall be developed as an 80-foot monopine. Prior to issuance of building permits, final construction plans shall depict the monopine design and shall be consistent with the approved mitigation measure.*
- D. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

FINDING: NO IMPACT:

The tower itself would not be artificially illuminated. Three service lights are proposed within the equipment compound and would be used only during site visits or emergency conditions. Because the service lighting would be intermittent and limited to the equipment area, the project would not create a substantial new source of light or glare affecting day or nighttime views.

II. AGRICULTURAL AND FORESTRY RESOURCES

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

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

FINDING: NO IMPACT:

The subject parcel is designated Limited Industrial and is zoned M-1 (Light Manufacturing). The proposed 50-foot by 50-foot lease area is located on a previously disturbed portion of the property and would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to a non-agricultural use.

- B. Conflict with existing zoning for agricultural use, or a Williamson Act Contract?

FINDING: NO IMPACT:

The subject parcel is zoned M-1 (Light Manufacturing) and is not subject to a Williamson Act Contract. The project would therefore not conflict with agricultural zoning or a Williamson Act Contract.

- C. Conflict with existing zoning for forest land, timberland, or timberland zoned Timberland Production; or

- D. Result in the loss of forest land or conversion of forest land to non-forest use?

FINDING: NO IMPACT:

The subject parcel is zoned M-1 (Light Manufacturing) and is not subject to a Williamson Act Contract. The project would therefore not conflict with agricultural zoning or a Williamson Act Contract.

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

FINDING: NO IMPACT:

The project would occupy a 50-foot by 50-foot lease area on an industrially designated parcel. The limited project footprint and existing developed/disturbed setting would not induce off-site conversion of farmland or forest land to non-agricultural or non-forest use.

III. AIR QUALITY

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

- A. Conflict with or obstruct implementation of the applicable Air Quality Plan; or
- 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?

FINDING: LESS THAN SIGNIFICANT IMPACT:

The proposed unmanned telecommunications facility would not conflict with or obstruct implementation of an applicable air quality plan. Construction would be temporary and limited to the tower foundation, equipment compound, utility improvements, and access work and would generate short-term construction emissions. Operational activity would be limited to occasional maintenance trips and operation of the backup generator during power outages. Given the limited construction footprint and low-intensity operational characteristics, the project would not result in a cumulatively considerable net increase of criteria pollutants. Impacts would be less than significant.

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

FINDING: LESS THAN SIGNIFICANT IMPACT:

The nearest residence identified in the project application materials is approximately 329 feet from the proposed facility. Construction-related emissions would be temporary, and the unmanned facility would generate minimal operational emissions other than occasional maintenance vehicle trips and intermittent use of the backup diesel generator. The project is not expected to expose nearby sensitive receptors to substantial pollutant concentrations or generate odors or other emissions affecting a substantial number of people. The impact would be less than significant.

IV. BIOLOGICAL RESOURCES

Would the project:

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

FINDING: NO IMPACT:

The proposed lease area is located on a previously disturbed portion of the subject parcel within an existing developed area. The Initial Study application identifies brush as the principal vegetative cover and identifies no perennial or intermittent watercourse on the site. The limited 2,500-square-foot lease area and associated utility improvements would not remove or modify identified habitat for candidate, sensitive, or special-status species. No impact is anticipated.

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

FINDING: NO IMPACT:

The project application and site plans do not identify riparian habitat, a sensitive natural community, or state- or federally protected wetlands within the proposed development footprint. The project would not involve the removal, filling, or hydrologic interruption of a wetland or riparian feature.

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

FINDING: NO IMPACT:

The proposed facility would occupy a limited, previously disturbed development area and would not create a barrier to wildlife movement or substantially interfere with an established migratory corridor or native wildlife nursery site. No such corridor or nursery site is identified within the proposed development footprint.

- E. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance; or

- 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?

FINDING: NO IMPACT:

The project record does not identify a local biological-resource protection ordinance, adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved conservation plan that would conflict with the proposed facility. The project would therefore have no impact under these criteria.

V. CULTURAL RESOURCES

Would the project:

- A. Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5; or
- B. Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5; or
- C. Disturb any human remains, including those interred outside of formal cemeteries?

FINDING: LESS THAN SIGNIFICANT IMPACT WITH MITIGATION:

The proposed facility would be constructed within a previously disturbed portion of the subject parcel. No known historical or archaeological resource is identified within the proposed development footprint in the project record. Because construction would involve ground disturbance for the tower foundation, equipment pads, utility connections, and related improvements, previously unknown cultural resources or human remains could be encountered. Implementation of Mitigation Measure 3 would establish procedures for inadvertent discovery and reduce potential impacts to less than significant.

Mitigation Measure(s)

- 3. *If cultural resources are discovered during ground-disturbing activities, all work within the immediate area of the discovery shall cease and a qualified archaeologist shall evaluate the find and recommend any necessary treatment. If human remains are discovered, no further disturbance shall occur until the Fresno County Sheriff-Coroner has made the findings required by law regarding origin and disposition. If the remains are determined to be Native American, the Sheriff-Coroner shall notify the Native American Heritage Commission within the time required by applicable law, and further treatment shall proceed in accordance with applicable State requirements.*

VI. ENERGY

Would the project:

- A. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation; or
- B. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

FINDING: NO IMPACT:

The proposed facility would be unmanned and would have limited operational energy demand associated with telecommunications equipment, security/service lighting, and related electrical systems. The project would be constructed in accordance with applicable building, electrical, and energy requirements. The project would not result in wasteful, inefficient, or unnecessary consumption of energy resources or conflict with an applicable renewable-energy or energy-efficiency plan.

VII. GEOLOGY AND SOILS

Would the project:

- A. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:
 - 1. 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?

FINDING: NO IMPACT:

According to Figure 8-1 of the 2024 Fresno County General Plan Background Report and the California Department of Conservation Earthquake Hazard Zone Application (EQ Zapp), the project is not located on a known earthquake fault zone.

- 2. Strong seismic ground shaking?
- 3. Seismic-related ground failure, including liquefaction?

FINDING: NO IMPACT:

According to the California Geological Survey information cited in the project record, the project site is not located in an identified earthquake fault zone and is not identified as susceptible to liquefaction.

- 4. Landslides?

FINDING: NO IMPACT:

According to the 2024 Fresno County General Plan Background Report the project area is in a low-risk area for landslides.

B. Result in substantial soil erosion or loss of topsoil?

FINDING: NO IMPACT:

Construction would cause localized ground disturbance and add limited impervious surfaces within the 50-foot by 50-foot equipment compound and associated access/utility areas. The site is relatively flat, and the limited construction footprint would not result in substantial soil erosion or loss of topsoil.

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

FINDING: NO IMPACT:

According to the 2024 Fresno County General Plan Background Report, the project site is located in an area with low risk for landslides and liquefaction. The project record does not identify an unstable geologic unit, lateral-spreading condition, or other soil condition that would result in substantial instability from the proposed development.

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

FINDING: NO IMPACT:

According to the 2024 Fresno County General Plan Background Report, the project site is not located in an area identified as having expansive-soil constraints.

D. 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; or

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

FINDING: NO IMPACT:

The project would not use a septic system or alternative wastewater disposal system because the facility would be unmanned and requires no water or sewer service. No unique paleontological resource, site, or unique geologic feature is identified within the proposed development footprint in the project record.

VIII. GREENHOUSE GAS EMISSIONS

Would the project:

- A. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment; or
- B. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

FINDING: NO IMPACT:

The proposed telecommunications facility would be unmanned and would not generate regular employee or customer trips. Construction activities would be temporary and limited to the relatively small project footprint. Following construction, vehicle activity would be limited to occasional maintenance visits, and the backup diesel generator would operate only during power outages and necessary testing or maintenance. Given the limited scale and operational characteristics of the facility, the project would not result in greenhouse gas emissions that would adversely affect the environment. The project would also not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing greenhouse gas emissions. Therefore, no impact would occur.

VIII. HAZARDS AND HAZARDOUS MATERIALS

Would the project:

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

FINDING: NO IMPACT:

The project includes a 147-gallon backup diesel generator within the secured equipment compound. The generator is accessory to the unmanned telecommunications facility and would be used for emergency backup power. Installation, fueling, operation, and maintenance of the generator are subject to applicable fire, hazardous-material storage, spill-prevention, and handling requirements. The proposed facility does not involve the routine transport, use, or disposal of hazardous materials in a manner that would create a significant hazard to the public or the environment, and no impact would occur.

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

FINDING: NO IMPACT:

The project site is approximately 0.32 mile south of Riverdale Elementary School and is therefore more than one-quarter mile from the school. The project would not emit

hazardous emissions or handle hazardous or acutely hazardous materials within one-quarter mile of an existing or proposed school.

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

FINDING: NO IMPACT:

According to the NEPAAssist database reviewed for the project, the project site is not located on a hazardous-materials site compiled pursuant to Government Code Section 65962.5. The project would therefore not create a significant hazard associated with a listed hazardous-materials site.

- 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?

FINDING: NO IMPACT:

The project site is not located within two miles of a public airport or public-use airport and is not identified as being within an airport land use plan. The applicant's tower application states that no airstrip or airport is located within five miles of the proposed site and identifies Selma Airport as the nearest public-use airport at approximately 15 miles. Based on the project coordinates and FAA airport location information, Naval Air Station Lemoore (Reeves Field) is approximately 8 miles from the project site. The project would therefore not expose people residing or working in the project area to an airport-related safety hazard or excessive noise.

- F. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan; or
- G. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

FINDING: NO IMPACT:

The project would use an existing local roadway network and would not obstruct or alter an adopted emergency response or evacuation route. The facility would be unmanned and is located in a Local Responsibility Area rather than a State Responsibility Area. The project would not expose people or structures to a significant wildland-fire risk or interfere with an adopted emergency response or evacuation plan.

X. HYDROLOGY AND WATER QUALITY

Would the project:

- A. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality; or
- B. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

FINDING: NO IMPACT:

The proposed telecommunications facility would be unmanned and would not require a water supply or wastewater disposal system. Construction and operation would not involve routine discharges to surface or groundwater and would not substantially decrease groundwater supplies or interfere with groundwater recharge.

- 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 result in substantial erosion or siltation on or off site?
 - 1. Result in substantial erosion or siltation on- or off-site;
 - 2. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?
 - 3. 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?

FINDING: NO IMPACT:

The project would construct an 80-foot monopine, equipment cabinets and canopy, a backup generator, raised concrete pads, utility equipment, and related improvements within a 50-foot by 50-foot fenced lease area, together with limited access and utility improvements. The site is relatively flat. The limited increase in impervious area would not substantially alter drainage patterns, cause substantial erosion or siltation, increase runoff in a manner resulting in flooding, or exceed the capacity of existing or planned drainage facilities. Surface runoff would be retained and managed in accordance with applicable County requirements.

- 4. Impede or redirect flood flows?

FINDING: NO IMPACT:

The project site is not located within an identified flood hazard area. The limited project footprint would not impede or redirect flood flows.

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

FINDING: NO IMPACT:

The project site is not located within an identified flood hazard area or near a body of water subject to tsunami or seiche hazards. The project would not create a risk of pollutant release due to inundation.

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

FINDING: NO IMPACT:

The project would not require operational water use or wastewater disposal and would not substantially affect groundwater recharge or surface-water quality. The project would therefore not conflict with or obstruct implementation of an applicable water quality control plan or sustainable groundwater management plan.

XI. LAND USE AND PLANNING

Would the project:

- A. Physically divide an established community?

FINDING: NO IMPACT:

The project would construct a telecommunications facility within a 50-foot by 50-foot lease area on an existing parcel. The project would not create a physical barrier or divide an established community.

- B. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

FINDING: NO IMPACT:

The subject parcel has a Limited Industrial General Plan designation and is zoned M-1 (Light Manufacturing). County Zoning review identified Section 814.2.020 as applicable, found no property-development-standard discrepancy requiring additional zoning clearance, and noted that proposed development will require applicable permits and inspections. The project would not cause a significant environmental impact due to a conflict with a land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

XII. MINERAL RESOURCES

Would the project:

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

- 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?

FINDING: NO IMPACT:

According to the 2024 Fresno County General Plan Background Report, the project site is not located on or near an identified mineral resource or mineral-producing site.

XIII. NOISE

Would the project result in:

- A. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies; or
- B. Generation of excessive ground-borne vibration or ground-borne noise levels?

FINDING: LESS THAN SIGNIFICANT IMPACT:

The project involves the construction and operation of a tower and associated communications equipment. A generator is proposed to be used only during emergencies and weekly maintenance procedures. Noise levels and vibrations associated with the project are not expected to result in significant impacts.

- 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; or

FINDING: NO IMPACT:

The project site is not located within two miles of a public or public-use airport and is not identified as being within an airport land use plan. The applicant identifies Selma Airport as the nearest public-use airport at approximately 15 miles. The project would not expose people residing or working in the project area to excessive airport-related noise.

XIV. POPULATION AND HOUSING

Would the project:

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

FINDING: NO IMPACT:

The project would construct an unmanned telecommunications facility and related equipment within a 50-foot by 50-foot lease area. The project would not construct housing, extend growth-inducing infrastructure, induce substantial unplanned population growth, or displace existing residents or housing.

XV. PUBLIC SERVICES

Would the project:

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

1. Fire protection;
2. Police protection;
3. Schools;
4. Parks; or
5. Other public facilities?

FINDING: NO IMPACT:

The proposed facility would be unmanned and would generate only occasional maintenance activity. It would not create a substantial demand for fire protection, law enforcement, schools, parks, or other governmental services and would not require construction or expansion of governmental facilities.

XVI. RECREATION

Would the project:

- A. Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated; or
- B. Include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?

FINDING: NO IMPACT:

The proposed facility would be unmanned and would neither increase use of existing neighborhood or regional parks nor include or require construction or expansion of recreational facilities.

XVI. TRANSPORTATION

Would the project:

- A. Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities; or
- B. Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

FINDING: NO IMPACT:

The proposed facility would be unmanned and would generate only occasional maintenance trips after construction. This limited level of vehicle activity would not conflict with a County transportation plan, program, ordinance, or policy and would not result in a significant vehicle-miles-traveled impact under CEQA Guidelines Section 15064.3.

- C. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?; or
- D. Result in inadequate emergency access?

FINDING: NO IMPACT:

Road Maintenance and Operations reviewed the project and identified standard requirements addressing gate setback, roadway right-of-way, driveway/encroachment improvements, sight-distance/corner-clearance requirements, and work within County right-of-way. These requirements can be incorporated as project conditions and notes. The project would use existing access from Marty Avenue and would not create a hazardous geometric design condition or result in inadequate emergency access.

XVIII. TRIBAL CULTURAL RESOURCES

Would the project:

- 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:

1. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or
2. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of 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?

FINDING: LESS THAN SIGNIFICANT WITH MITIGATION

Four California Native American Tribes traditionally and culturally affiliated with the project area were notified of the project by certified mail on August 27, 2026 and provided an opportunity to request consultation with the County. No request for consultation had been received as of preparation of this Initial Study. The proposed development area has been previously disturbed, and the project record does not identify a known tribal cultural resource within the development footprint. Because ground-disturbing activities could encounter previously unknown cultural or tribal cultural resources, Mitigation Measure 3 establishes an inadvertent-discovery procedure. The County will complete all applicable tribal consultation requirements prior to final action on the environmental document. With implementation of Mitigation Measure 3, the impact would be less than significant.

Mitigation Measure(s)

See Section V. Cultural Resources Mitigation Measure #3

XIX. UTILITIES AND SERVICE SYSTEMS

Would the project:

- 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 or relocation of which could cause significant environmental effects?

FINDING: NO IMPACT:

The project would construct a new telecommunications facility and associated electrical and telecommunications utility improvements. The applicant proposes a PG&E transformer adjacent to the lease area and a utility route serving the equipment compound. PG&E reviewed the proposed plans and determined that the improvements do not appear to directly interfere with existing PG&E facilities or land rights, subject to resubmittal if the design is subsequently modified and compliance with Underground Service Alert requirements before excavation. The project would not require new or expanded water, wastewater, natural-gas, or storm-drainage facilities that could cause significant environmental effects.

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

FINDING: NO IMPACT:

The proposed facility would be unmanned and would not require water for normal operation. No water-supply facilities are required.

- 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?

FINDING: NO IMPACT:

The proposed facility would be unmanned and requires no sewer service. The project would not generate wastewater requiring service from a wastewater treatment provider.

- 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; or

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

FINDING: NO IMPACT:

Routine operation of the unmanned facility would generate negligible solid waste. Any construction or maintenance waste would be managed in accordance with applicable federal, State, and local solid-waste requirements. The project would not generate solid waste in excess of applicable standards or local disposal capacity and would not conflict with solid-waste management or reduction requirements.

XX. WILDFIRE

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, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects; or
- 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; or
- 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; or

- 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?

FINDING: NO IMPACT:

The 2025 Fresno County Fire Hazard Severity Zones Map identifies the project site within a Local Responsibility Area, and County Zoning review identifies the site as outside a State Responsibility Area. The site is relatively flat, the facility would be unmanned, and the project would not require fuel breaks, emergency water sources, or other wildfire-related infrastructure. The project would not substantially impair an emergency response plan, exacerbate wildfire risk, or expose people or structures to significant post-fire hazards.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

Would the project:

- A. 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?

FINDING: NO IMPACT:

The proposed facility would occupy a limited, previously disturbed development area and would not substantially degrade biological habitat, reduce a wildlife population below self-sustaining levels, threaten to eliminate a plant or animal community, restrict the range of a rare or endangered species, or eliminate known important examples of California history or prehistory.

- B. Have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

FINDING: LESS THAN SIGNIFICANT IMPACT:

The project would result in less-than-significant impacts related to Air Quality, Greenhouse Gas Emissions, and Noise, and less-than-significant impacts with mitigation related to Aesthetics, Cultural Resources, and Tribal Cultural Resources. Given the limited project footprint, unmanned operation, and implementation of Mitigation Measures 1 through 3, the project's incremental effects would not be cumulatively considerable.

- C. Have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?

FINDING: NO IMPACT:

The project would not cause substantial adverse effects on human beings, either directly or indirectly. Potential construction and operational effects are limited in scope and would remain less than significant, with mitigation incorporated where required.

CONCLUSION/SUMMARY

Based upon Initial Study No. 8896 prepared for Unclassified Conditional Use Permit No. 3851, staff concludes that the project would not have a significant effect on the environment. No impacts were identified for Agriculture and Forestry Resources, Biological Resources, Energy, Geology and Soils, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Mineral Resources, Population and Housing, Public Services, Recreation, Transportation, Utilities and Service Systems, Wildfire, and Mandatory Findings of Significance criteria A and C. Less-than-significant impacts were identified for Air Quality, Greenhouse Gas Emissions, Noise, and Mandatory Findings of Significance criterion B. Potential impacts related to Aesthetics, Cultural Resources, and Tribal Cultural Resources would be reduced to less than significant with implementation of Mitigation Measures 1 through 3.

A Mitigated Negative Declaration is recommended. Mitigation Measures 1 through 3 shall be incorporated into the project approval and Mitigation Monitoring and Reporting Program. The Initial Study is available for review at 2220 Tulare Street, Suite A, street level, at the southwest corner of Tulare and "M" Streets, Fresno, California.

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