County of Madera
California Environmental Quality Act (CEQA)
Initial Study

1. Project title:	PRJ #2026-005 – Cedar Ave Recycling and Transfer LP
2. Lead agency name and address:	County of Madera Community and Economic Development Department 200 West 4th Street, Suite 3100 Madera, California 93637
3. Contact person and phone number:	Jacob Aragon, Senior Planner 559-675-7821 Jacob.Aragon@maderacounty.com
4. Project Location & APN:	The subject property is located on the northeast and southeast corners of Avenue 22 and Road 19 1/2 (No Situs), Chowchilla.
5. Project sponsor's name and address:	Cedar Ave Recycling and Transfer LP 3457 S. Cedar Avenue Fresno, CA 93725
6. General Plan Designation:	AR (Agriculture Residential)
7. Zoning:	AR-5 (Agriculture, Rural, 5 Acre) District CRH (Commercial, Rural, Highway) District

8. Description of project:

The request consists of a General Plan Amendment to change the land use designation from Agriculture Residential (AR) to Light Industrial (LI), and a Rezone from the Commercial Rural Highway (CRH) and Agriculture, Rural 5-Acre (AR-5) Districts to the Industrial Light (IL) District. The 5.84-acre project site, identified as APNs 027-092-024 and 027-201-022, is proposed to establish the Caglia/Redrock Environmental headquarters and operations facility.

The proposed development includes two modular administrative office buildings totaling approximately 2,880 square feet, an approximately 8,000-square-foot maintenance and operations building, and associated parking for administrative staff and mobile field fleet vehicles. Access to the project site will be provided from Road 19½.

9. Surrounding Land Uses and Setting:

Surrounding properties are zoned Agriculture, Rural 5-Acre (AR-5), Agriculture, Rural Exclusive 40-Acre (ARE-40), Open Space (OS), and Commercial Rural General (CRG). The

surrounding General Plan land use designations include Agriculture Residential (AR) and Public Institutional (PI).

The project site is located within a predominantly rural area characterized by agricultural operations, large rural parcels, and scattered residential development. The site is situated east of the Fairmead Landfill, with the surrounding area generally maintaining a low-density development pattern consisting primarily of agricultural and rural land uses.

10. Other Public Agencies Whose Approval is Required:

None.

11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code Section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

Under AB 52, Tribal Governments have been notified of the Project. (See Section XVIII for additional discussion.).

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

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

DETERMINATION (to be completed by Lead Agency)	
On the basis of this initial evaluation:	
☐	I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
☒	I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
☐	I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
☐	I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
☐	I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signed: Jacob Aragon Date: 09/23/2026

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

Responses:

a) Less Than Significant Impact.

The project site is located within a predominantly rural area characterized by agricultural uses, scattered residential development, and the Fairmead Landfill to the west. The proposed project would establish an administrative headquarters and operations facility consisting of two modular office buildings totaling approximately 2,880 square feet, an 8,000-square-foot maintenance and operations building, and associated parking areas. The project site is not identified as containing or providing views of a designated scenic vista. Although development would introduce new structures and improvements to the site, the proposed improvements are not anticipated to substantially obstruct or adversely affect scenic views available to the public. Therefore, impacts to scenic vistas would be less than significant.

b) No Impact.

The project site is not located within or adjacent to an officially designated State Scenic Highway. According to the California Department of Transportation (Caltrans) State Scenic Highway Map, the nearest officially designated State Scenic Highway is located approximately 35 miles northwest of the project site. The project site does not contain any identified scenic resources, including notable trees, rock outcroppings, or historic buildings associated with a State Scenic Highway. Given the distance from the nearest officially designated scenic highway, the proposed project would not damage scenic resources within a designated scenic highway. Therefore, no impact would occur.

c) Less Than Significant Impact.

The project site is located in a non-urbanized area characterized by agricultural uses, large rural parcels, scattered residential development, and the Fairmead Landfill to the west. The proposed project would introduce an administrative headquarters and operations facility to the site, including two modular office buildings, a maintenance and operations building, and associated parking and vehicle circulation areas. Although the project would alter the existing visual character of the site through the introduction of commercial and industrial-style improvements, the proposed development would be concentrated within the 5.84-acre project site and would be consistent with the surrounding area's existing mix of rural, commercial, and institutional land uses. The project would not substantially degrade public views of the surrounding area. Therefore, impacts to visual character and quality would be less than significant.

d) Less Than Significant Impact.

The proposed project would introduce new sources of lighting associated with the administrative office buildings, maintenance and operations building, parking areas, and vehicle circulation areas. Exterior lighting would be necessary for building security, employee safety, and nighttime operations, as applicable. However, all exterior lighting would be required to comply with applicable Madera County lighting standards and be designed and installed to minimize light spillover onto adjacent properties and glare visible from public roadways. Lighting would be appropriately shielded and directed downward. Building materials and exterior finishes would be selected to minimize reflective glare. With compliance with applicable County requirements, the project is not anticipated to create a substantial new source of light or glare that would adversely affect day or nighttime views. Therefore, impacts would be less than significant.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
II. AGRICULTURAL AND FORESTRY RESOURCES In determining whether agricultural 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 provided in Forest Protocols adopted by the California Air Resources Board.				
Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☒	☐
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☒	☐

Responses:

a) No Impact.

According to the California Department of Conservation's Farmland Mapping and Monitoring Program (FMMP), both APNs 027-092-024 and 027-201-022 are designated as Rural

Residential Land and Vacant or Disturbed Land. Neither parcel is designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Therefore, implementation of the proposed General Plan Amendment and Rezone, including development of the Caglia/Redrock Environmental headquarters and operations facility, would not result in the conversion of protected farmland to non-agricultural use. No impact would occur.

b) Less Than Significant Impact.

The project site is currently zoned Commercial Rural Highway (CRH) and Agriculture, Rural 5-Acre (AR-5). The proposed Rezone would change both existing zoning designations to Industrial Light (IL) to accommodate the proposed headquarters and operations facility. Although a portion of the project site is currently zoned for agricultural use, the site is not designated as protected farmland under the FMMP and the proposed development would be subject to approval of the requested General Plan Amendment and Rezone. The Project would not involve the cancellation or modification of an existing Williamson Act contract. Therefore, the proposed land use and zoning changes would not conflict with an existing Williamson Act contract or result in an incompatible agricultural zoning designation. Impacts would be less than significant.

c) No Impact.

The project site is located within a predominantly rural area characterized by agricultural uses and scattered residential development. Neither parcel is zoned or designated for forest land, timberland, or Timberland Production. The proposed General Plan Amendment and Rezone would change the existing land use and zoning designations to Industrial Light (IL) and would not involve the conversion or rezoning of forest land or timberland. Therefore, no impact would occur.

d) No Impact.

The project site is not identified as forest land and is not currently utilized for timber production or forestry-related activities. The proposed Project would establish an administrative headquarters and operations facility on the approximately 5.84-acre site. Implementation of the Project would not result in the loss or conversion of forest land to non-forest use. Therefore, no impact would occur.

e) Less Than Significant Impact.

The proposed Project would change the existing land use and zoning designations to Industrial Light (IL) to accommodate the development of the Caglia/Redrock Environmental headquarters and operations facility. The project site is located within a predominantly rural area characterized by agricultural operations, scattered residential development, and the Fairmead Landfill to the west. Although the proposed development would introduce industrial uses to the site, the Project would be confined to the approximately 5.84-acre property. Both parcels are designated as Rural Residential Land and Vacant or Disturbed Land under the FMMP and are not identified as protected farmland. The Project is not anticipated to result in indirect changes that would substantially contribute to the conversion of surrounding farmland or forest land to non-agricultural or non-forest uses. Therefore, impacts would be less than significant.

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

Responses:

a) Less Than Significant Impact.

The project site is located within the San Joaquin Valley Air Basin and is subject to the air quality planning requirements of the San Joaquin Valley Air Pollution Control District (SJVAPCD). The proposed Project would establish an administrative headquarters and operations facility consisting of two modular office buildings totaling approximately 2,880 square feet, an 8,000-square-foot maintenance and operations building, and associated parking and vehicle circulation areas. Construction activities would generate temporary emissions associated with equipment use, earthwork, and construction vehicle trips. Long-term operational emissions would primarily result from employee vehicle trips, mobile fleet vehicle activity, and energy consumption associated with the proposed buildings.

The Project would be required to comply with applicable SJVAPCD rules and regulations, including requirements for construction-related dust control and other applicable emission control measures. The Project would not establish a use that would independently alter the assumptions or growth projections of the applicable air quality plan. Provided the Project complies with applicable SJVAPCD requirements, it is not anticipated to conflict with or obstruct implementation of the applicable air quality plan. Therefore, impacts would be less than significant.

b) Less Than Significant Impact.

The San Joaquin Valley Air Basin is currently designated nonattainment for applicable

ozone and fine particulate matter (PM2.5) standards. Construction of the proposed Project would result in temporary emissions of reactive organic gases (ROG), oxides of nitrogen (NOx), carbon monoxide (CO), and particulate matter (PM10 and PM2.5) from construction equipment, grading, building construction, and construction-related vehicle trips. Long-term operational emissions would be generated primarily by employee commute trips, mobile fleet vehicle activity, and energy consumption associated with the proposed office and maintenance facilities.

The SJVAPCD has established significance thresholds for construction and operational emissions to evaluate whether a project would result in a significant contribution to regional air quality impacts. The Project would be subject to applicable SJVAPCD requirements, including Regulation VIII for fugitive dust control during construction. Construction and operational emissions should be evaluated using the District's applicable screening criteria and significance thresholds. Provided emissions remain below applicable significance thresholds and required dust control measures are implemented, the Project would not result in a cumulatively considerable net increase of criteria pollutants. Therefore, impacts would be less than significant.

c) Less Than Significant Impact.

The project site is located in a predominantly rural area characterized by agricultural operations, scattered residential development, and the Fairmead Landfill to the west. Sensitive receptors in the surrounding area may include existing rural residences. Construction activities would generate temporary emissions from diesel-powered construction equipment, grading, excavation, and construction-related vehicle trips. Long-term operations would generate emissions primarily from employee vehicles and mobile fleet vehicles associated with the headquarters and maintenance operations.

Although the Project would introduce additional vehicle activity and maintenance operations to the site, it is not proposed to include a major stationary source of air pollution or an industrial manufacturing process. Construction activities would be required to comply with applicable SJVAPCD regulations, including fugitive dust control requirements. Provided that construction and operational emissions do not exceed applicable SJVAPCD thresholds and that applicable emission control requirements are implemented, the Project is not anticipated to expose nearby sensitive receptors to substantial pollutant concentrations. Therefore, impacts would be less than significant.

d) Less Than Significant Impact.

The proposed Project would establish an administrative headquarters and operations facility for Caglia/Redrock Environmental, including modular office buildings, a maintenance and operations building, and parking for administrative staff and mobile fleet vehicles. Potential sources of odors during construction would be temporary and generally associated with diesel-powered construction equipment, vehicle exhaust, and construction activities. During long-term operations, potential odor sources could include vehicle exhaust and emissions associated with maintenance activities and the operation of mobile fleet vehicles. However, the Project does not propose a waste processing or disposal facility, and no substantial odor-generating industrial processes have been identified as part of the proposed development. The project site is located in a predominantly rural area with relatively sparse residential development, which further limits the potential for odors to affect a substantial number of people. Therefore, the Project is not anticipated to generate

substantial odors or other emissions that would adversely affect a substantial number of people, and impacts would be less than significant.

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

Responses:

a) Less Than Significant With Mitigation

The project site consists of approximately 5.84 acres of previously disturbed land. A biological resources assessment was prepared for the project site and evaluated the potential presence of special-status plant and wildlife species. The assessment identified 19 special-status plant species with documented occurrences in the vicinity; however, due to the history of disturbance

and existing site conditions, suitable habitat for these species is not present within the project site. Therefore, the potential for special-status plant species to occur onsite is considered negligible.

The assessment also evaluated 16 special-status wildlife species. Thirteen species were determined to be absent or unlikely to occur onsite due to the lack of suitable habitat or the project site's location outside their known distribution. These species include vernal pool fairy shrimp, vernal pool tadpole shrimp, valley elderberry longhorn beetle, Crotch's bumble bee, California tiger salamander, blunt-nosed leopard lizard, bald eagle, Fresno kangaroo rat, San Joaquin kit fox, western spadefoot, coast horned lizard, burrowing owl, and American badger. Northern harrier and tricolored blackbird may occasionally forage within the project site; however, suitable breeding habitat is not present, and similar or higher-quality foraging habitat is available in the surrounding region. Therefore, impacts to these species would be less than significant.

The assessment identified potential nesting habitat for birds protected under the Migratory Bird Treaty Act and California Fish and Game Code, including suitable nesting trees onsite and in the surrounding area. Construction activities and vegetation removal during the nesting season could result in direct impacts to active nests, including injury or mortality of eggs and young, or indirect impacts resulting from nest abandonment.

The assessment also identified potential habitat for Swainson's hawk, a state-listed threatened species. A stick nest was observed in a eucalyptus tree within the Fairmead Landfill property, approximately 350 feet southwest of the project site. The project site also contains ruderal vegetation that may provide suitable foraging habitat. Although the loss of approximately 5.84 acres of potential foraging habitat is not considered significant due to the availability of similar or higher-quality habitat in the surrounding region, construction activities during the nesting season could disturb active nests and adversely affect reproductive success.

Implementation of the following mitigation measures would reduce potential impacts to nesting birds and Swainson's hawk to less-than-significant levels:

BIO-MM-1: Construction Timing.

If feasible, the project will be implemented outside of the avian nesting season, typically defined as February 1 to August 31.

BIO-MM-2: Preconstruction Surveys.

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

BIO-MM-3: Nest Avoidance.

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

BIO-MM-4: Construction Timing.

To avoid impacts to nesting Swainson's hawks, construction activities will occur, where possible, outside the nesting season, typically defined as March 1-August 31.

BIO-MM-5: Preconstruction Surveys.

If project-related activities must occur between March 1 and August 31, a qualified biologist will conduct surveys prior to the start of construction for active Swainson's hawk nests within ½ mile of the site in accordance with the SHTAC (2000) guidelines. The guidelines define five survey periods for Swainson's hawk: Period I: January 1-March 20; Period II: March 20-April 5; Period III: April 5-April 20; Period IV: April 21-June 10; and Period V: June 10-July 30. The guidelines prescribe a minimum of three surveys per survey period for at least the two survey periods immediately prior to a project's initiation, and specifically recommend that surveys be completed in Periods II, III, and V.

BIO-MM-6: Nest Avoidance.

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

With implementation of BIO-MM-1 through BIO-MM-6, potential impacts to special-status species and nesting birds would be reduced to less-than-significant levels.

b) No Impact

According to the biological resources assessment, no riparian habitat or sensitive natural communities were identified within the project site or surrounding lands. The project site consists of previously disturbed land and does not contain vegetation communities identified as sensitive by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. Therefore, implementation of the proposed project would not result in direct or indirect impacts to riparian habitat or other sensitive natural communities. No impact would occur.

c) No Impact

The biological resources assessment identified no aquatic features or potentially jurisdictional waters of the United States or State within the project site. Therefore, project construction and operation would not result in the direct removal, filling, or hydrological interruption of state or federally protected wetlands. No impact would occur.

d) No Impact

The biological resources assessment determined that the project site and adjoining lands do not contain features that function as established wildlife movement corridors or native wildlife nursery sites. The site is previously disturbed and does not provide a unique or otherwise important habitat connection for native resident or migratory wildlife. Therefore, implementation of the proposed project would not substantially interfere with wildlife movement or impede the use of a wildlife nursery site. No impact would occur.

e) No Impact

The biological resources assessment determined that the project site is not located within an area identified as containing sensitive biological resources under the Madera County General Plan. The assessment further concluded that the project would be consistent with applicable General Plan policies protecting biological resources. No conflict with applicable local biological resource policies or ordinances has been identified. Therefore, no impact would occur.

f) No Impact

According to the biological resources assessment, the project site is not located within an area covered by an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. No applicable habitat conservation plan was identified that would govern the project site or proposed activities. Therefore, implementation of the proposed project would not conflict with the provisions of an adopted habitat conservation plan. No impact would occur.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
V. CULTURAL RESOURCES Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☐	☐	☐	☒
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☐	☒	☐
c) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☒	☐

Responses:

a) No Impact

A cultural resources desktop review was prepared for the proposed Caglia project in Fairmead, Madera County, to evaluate potential impacts to cultural resources in accordance with CEQA

and applicable provisions of the California Public Resources Code. The records search was conducted through the Southern San Joaquin Valley Information Center (SSJVIC) for the project site and a one-half-mile surrounding area. The records search was requested on September 17, 2025, and results were returned on October 27, 2025, under Search No. 25-432. The search identified one previous cultural resources study within the project site; however, that study did not identify any cultural resources.

Based on the results of the records search, no known historical resources have been identified within the project site or surrounding one-half-mile study area. Therefore, the proposed project is not anticipated to cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5. No impact would occur.

b) Less Than Significant Impact

The cultural resources desktop review included a records search of the project site and a one-half-mile surrounding area through the SSJVIC. The search identified one previous study within the project site, which did not identify any cultural resources. Additionally, the Native American Heritage Commission (NAHC) was contacted on October 15, 2025, to request a search of its Sacred Lands File. The NAHC returned negative results on October 17, 2025.

The NAHC also provided a list of 13 tribal affiliates who may have knowledge of the project area. These tribal contacts were initially contacted by email on October 17, 2025, and follow-up telephone calls were made on November 5, 2025. The correspondence is documented in Attachment C of the cultural resources review.

Based on the records search and negative Sacred Lands File results, no known archaeological resources have been identified within the project site. However, previously undiscovered archaeological resources could be encountered during ground-disturbing activities. If archaeological resources are discovered during construction, work in the immediate vicinity of the discovery should cease, and a qualified archaeologist should be contacted to evaluate the find and recommend appropriate treatment measures. With implementation of these procedures, potential impacts to archaeological resources would be less than significant.

c) Less Than Significant Impact

The cultural resources desktop review did not identify any known human remains or burial sites within the project site. However, the possibility exists that previously undiscovered human remains could be encountered during ground-disturbing activities. In the event human remains are discovered, all work in the immediate vicinity of the discovery shall cease, and the County Coroner shall be notified in accordance with California Health and Safety Code Section 7050.5. If the remains are determined to be Native American, the appropriate procedures outlined in Public Resources Code Section 5097.98 shall be followed. Compliance with these statutory requirements would reduce potential impacts to human remains to a less-than-significant level.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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?	☐	☐	☒	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☐	☒

Responses:

a) Less Than Significant Impact

The proposed project would result in energy consumption during both construction and operation. Construction activities would require the use of fuel for construction equipment, vehicles, and transportation of materials. Energy consumption during construction would be temporary and limited to the duration of construction activities. Construction equipment and vehicles would be expected to comply with applicable state regulations governing fuel efficiency and emissions.

Following construction, the project would operate as the Caglia/Redrock Environmental headquarters and operations facility. Operational energy consumption would primarily include electricity and natural gas, if applicable, for the two modular administrative office buildings totaling approximately 2,880 square feet and the approximately 8,000-square-foot maintenance and operations building. Additional energy consumption would result from lighting, heating and cooling, office equipment, and vehicle fueling and maintenance activities.

The project would be required to comply with applicable California Building Energy Efficiency Standards (Title 24, Part 6), California Green Building Standards Code (Title 24, Part 11), and other applicable energy-efficiency requirements. These standards are intended to reduce energy consumption through efficient building design, lighting, mechanical systems, and construction practices. The project would also be required to comply with applicable vehicle and equipment emissions and efficiency regulations.

Given the relatively limited size of the proposed development and the anticipated nature of construction and operational activities, the project is not expected to result in wasteful, inefficient, or unnecessary consumption of energy resources. Therefore, impacts related to energy consumption would be less than significant.

b) No Impact

The proposed project would be required to comply with applicable state and local energy-efficiency requirements, including the California Building Energy Efficiency Standards (Title 24, Part 6) and California Green Building Standards Code (Title 24, Part 11). These

standards establish requirements for energy-efficient building design, construction, lighting, and mechanical systems.

The project does not include any components that would conflict with or obstruct the implementation of applicable state or local renewable energy or energy-efficiency plans. The proposed headquarters and operations facility would be subject to applicable building permit requirements and energy-efficiency standards at the time of construction. Therefore, the project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency, and no impact would occur.

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

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☒	☐

Responses:

a) i) No Impact

The project site is not located within an Earthquake Fault Zone as delineated on the California Geological Survey's Alquist-Priolo Earthquake Fault Zone Maps. No known active earthquake fault has been identified crossing the project site. Therefore, implementation of the proposed project would not expose people or structures to substantial risks associated with surface fault rupture. No impact would occur.

ii) Less Than Significant Impact

Although the project site is not located within an Alquist-Priolo Earthquake Fault Zone, the project site, like other areas of California, may experience ground shaking resulting from regional seismic activity. Strong ground shaking could potentially affect the proposed office buildings, maintenance and operations building, and associated improvements.

The proposed structures would be required to comply with applicable California Building Standards Code requirements, including seismic design and construction standards. Compliance with these requirements would help ensure that structures are designed to withstand anticipated seismic forces and reduce potential risks to occupants and property. Therefore, impacts associated with strong seismic ground shaking would be less than significant.

iii) Less Than Significant Impact

Seismic-related ground failure, including liquefaction, can occur in areas with loose, saturated, granular soils subjected to strong ground shaking. The potential for liquefaction depends on subsurface soil conditions, groundwater levels, and the intensity of seismic activity.

The project would be subject to applicable building code requirements and site preparation standards. Any required geotechnical recommendations regarding soil conditions, foundation design, and site preparation would be incorporated into project construction. Compliance with applicable requirements would reduce potential impacts associated with seismic-related ground failure to a less-than-significant level.

iv) No Impact

The project site is located in a generally level area of Madera County and does not contain steep slopes or significant topographic relief that would be susceptible to landslides. The

proposed development would not involve activities that would substantially alter slopes or create unstable hillside conditions. Therefore, the project would not expose people or structures to substantial risks associated with landslides, and no impact would occur.

b) Less Than Significant Impact

Construction activities, including site preparation, grading, excavation, and building construction, would temporarily expose soils and could result in erosion or loss of topsoil from wind and stormwater runoff. Once construction is complete, the majority of disturbed areas would be covered by buildings, parking areas, driveways, or other improvements, thereby reducing the potential for long-term erosion.

The project would be required to comply with applicable County grading requirements and construction stormwater regulations. Erosion and sediment control measures would be implemented during construction, as applicable, to minimize soil loss and prevent sediment from leaving the project site. Therefore, impacts associated with soil erosion and loss of topsoil would be less than significant.

c) Less Than Significant Impact

The proposed project would involve construction of administrative office buildings, a maintenance and operations building, parking areas, and associated site improvements. Construction would require grading, excavation, and soil compaction, which could potentially expose unstable subsurface soil conditions if present.

The project would be required to comply with applicable building and grading requirements, including any site-specific geotechnical recommendations necessary to ensure adequate foundation support and soil stability. These requirements would address potential concerns related to unstable soils, settlement, subsidence, and other forms of ground failure. Therefore, impacts associated with unstable geological units or soils would be less than significant.

d) Less Than Significant Impact

Expansive soils may undergo changes in volume in response to variations in moisture content, potentially resulting in movement or damage to building foundations, pavement, and other improvements. The presence and degree of expansive soils at the project site would depend on the site's subsurface soil characteristics.

The project would be subject to applicable California Building Standards Code requirements and any geotechnical recommendations addressing expansive soil conditions. If expansive soils are encountered, appropriate site preparation, soil treatment, or foundation design measures would be incorporated into construction. Therefore, impacts associated with expansive soils would be less than significant.

e) Less Than Significant Impact

If the proposed project would utilize an onsite wastewater treatment system, the suitability of the underlying soils would be evaluated by the applicable County Environmental Health Division. Approval of any septic system would be subject to applicable County

requirements, including review of soil conditions, percolation characteristics, groundwater separation, and adequate disposal area.

Provided the proposed wastewater disposal system is approved by the County and designed in accordance with applicable requirements, impacts associated with soil suitability for septic tanks or alternative wastewater disposal systems would be less than significant.

f) Less Than Significant Impact

Construction of the proposed project would involve grading, excavation, and other ground-disturbing activities that could potentially encounter previously unidentified paleontological resources. No known unique paleontological resources, paleontological sites, or unique geologic features have been identified within the project site based on the information currently available.

If previously unidentified paleontological resources are encountered during construction, work in the immediate vicinity of the discovery should cease, and a qualified paleontologist should be contacted to evaluate the discovery and recommend appropriate treatment measures. With implementation of appropriate inadvertent discovery procedures, potential impacts to paleontological resources would be less than significant.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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?	☐	☐	☒	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

Responses:

a) Less Than Significant Impact

Construction of the proposed project would generate temporary greenhouse gas (GHG) emissions from construction equipment, delivery vehicles, and worker trips. These emissions would be temporary and limited to the construction period.

Operational GHG emissions would primarily result from electricity and other energy consumption associated with the two modular administrative office buildings totaling approximately 2,880 square feet and the approximately 8,000-square-foot maintenance and operations building, as well as vehicle activity associated with employees and the company's existing fleet.

The proposed project primarily consists of relocating and consolidating existing Caglia/Redrock Environmental operations. As a result, many environmental effects associated with ongoing operations, including employee commute trips and regional vehicle miles traveled (VMT), are anticipated to remain substantially unchanged from existing baseline conditions. Existing employees already commute to the immediate project vicinity, and the relocation of employees and workstations within approximately one-half mile of the existing operations is not anticipated to generate new regional VMT or a substantial increase in baseline vehicle trips. Accordingly, the project is anticipated to result primarily in a negligible redistribution of existing localized traffic movements rather than a substantial increase in overall transportation activity.

Although construction and building operations would generate some GHG emissions, the project would not substantially increase regional vehicle travel or introduce a substantially new source of operational emissions compared to existing conditions. The project would also be required to comply with applicable state energy-efficiency and building requirements, including the California Building Energy Efficiency Standards (Title 24, Part 6) and California Green Building Standards Code (Title 24, Part 11).

Therefore, the proposed project is not anticipated to generate GHG emissions that would have a significant impact on the environment, and impacts would be less than significant.

b) Less Than Significant Impact

The State of California has adopted various regulatory programs and climate action strategies intended to reduce GHG emissions, including Assembly Bill 32, Senate Bill 32, and the California Air Resources Board's Climate Change Scoping Plan. These programs establish statewide GHG reduction targets and strategies addressing transportation, energy consumption, building efficiency, and other sources of emissions.

The proposed project primarily involves the relocation and consolidation of existing operations rather than the establishment of a substantially expanded operation. Existing employees are already commuting to the immediate project vicinity, and the relocation of employees and workstations within approximately one-half mile is not anticipated to generate additional regional VMT or substantially increase baseline vehicle trips. Consequently, the project would not be expected to substantially increase transportation-related GHG emissions compared to existing conditions.

Additionally, the proposed development would be required to comply with applicable state and local energy-efficiency and building requirements, including Title 24, Part 6, and Title 24, Part 11. The project would not introduce a land use or operational characteristic that would inherently conflict with applicable GHG reduction strategies.

Therefore, the proposed project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions, and impacts would be less than significant.

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

Responses:

a) Less Than Significant Impact

The proposed project would involve the development of a headquarters and operations facility, including a maintenance and operations building. Based on the information provided, vehicle washing would be the only proposed onsite activity involving the routine use of materials associated with vehicle maintenance. Such activities may involve limited quantities of cleaning agents, detergents, and other products commonly used for vehicle washing. These materials

would be required to be stored, handled, and disposed of in accordance with applicable federal, State, and local regulations.

The project would also be required to comply with applicable National Pollutant Discharge Elimination System (NPDES) stormwater requirements and implement measures to prevent or minimize stormwater contamination from project-related pollutants. Vehicle washing activities would be required to occur in an appropriately designed area, with wash water collected and discharged or disposed of in accordance with applicable requirements. With compliance with applicable hazardous materials handling, wastewater disposal, and stormwater regulations, the project would not create a significant hazard to the public or the environment. Impacts would be less than significant.

b) Less Than Significant Impact

The proposed project would include vehicle washing activities, which could involve the use of cleaning products and other materials that, if improperly handled or released, could affect soil or water quality. Additionally, accidental leaks or spills from vehicles and equipment could occur during normal site operations. However, the project would be required to comply with applicable federal, State, and local regulations governing the storage, handling, and disposal of potentially hazardous materials and the prevention of accidental releases.

The project would also be subject to applicable NPDES stormwater requirements. Post-development runoff leaving the property would be required to remain at or below pre-development discharge rates, and surface drainage onto adjacent properties would be prohibited. Detailed drainage plans and calculations prepared by a registered civil engineer would be submitted to the County for review and approval. These requirements, together with appropriate site design and operational practices, would reduce the potential for accidental releases to affect the surrounding environment. Therefore, impacts would be less than significant.

c) No Impact

The nearest school to the project site is Fairmead Elementary School, located approximately 0.75 mile north of the project site. The school is therefore outside the one-quarter-mile distance specified in this criterion. The project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. No impact would occur.

d) No Impact

The project site was reviewed against the applicable lists of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and was determined not to be identified on any such list. Although the project site is located east of the Fairmead Landfill, the site itself is not identified as a hazardous materials site pursuant to Government Code Section 65962.5. Therefore, the project would not create a significant hazard to the public or the environment as a result of being located on a listed hazardous materials site. No impact would occur.

e) No Impact

The project site is located approximately four miles southeast of the nearest airport and is not located within an adopted Airport Land Use Plan boundary. Therefore, the project would not expose people residing or working in the project area to airport-related safety hazards or excessive noise. No impact would occur.

f) Less Than Significant Impact

The project would be accessed from Road 19½ and would not involve the permanent closure or obstruction of any public roadway. Construction activities could result in temporary increases in vehicle traffic in the project vicinity; however, these activities would be temporary and would not be expected to interfere with the implementation of an adopted emergency response or evacuation plan. The project would be required to comply with applicable County access, roadway, and fire protection requirements to ensure adequate emergency vehicle access is maintained. Therefore, the project would not impair or physically interfere with an adopted emergency response or evacuation plan, and impacts would be less than significant.

g) Less Than Significant Impact

The project site is located within a Local Responsibility Area (LRA) and is not within a State Responsibility Area (SRA) under the jurisdiction of the California Department of Forestry and Fire Protection (CAL FIRE). The project site is also not located within a designated Fire Hazard Severity Zone, as the applicable LRA mapping does not identify a Fire Hazard Severity Zone designation for the area. The project would involve development of industrial and operational facilities in an area characterized by agricultural, rural, and industrial uses. Development would be required to comply with applicable County building and fire protection requirements, including provisions for adequate emergency access and fire safety. Therefore, the project would not expose people or structures to a significant risk involving wildland fires, and impacts would be less than significant.

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

Responses:

a) Less Than Significant Impact

Construction activities associated with the proposed project, including site preparation, grading, and building construction, could result in temporary soil disturbance and the potential for erosion and sedimentation. Additionally, operation of the proposed headquarters and maintenance

facility could generate pollutants associated with vehicle traffic, parking areas, and vehicle washing activities. If not properly managed, these pollutants could enter the stormwater drainage system and adversely affect surface or groundwater quality.

The project would be required to comply with all applicable National Pollutant Discharge Elimination System (NPDES) stormwater regulations and standards. Measures would be implemented to prevent or minimize stormwater contamination from project-related pollutants. Because the project would disturb one acre or more, a Stormwater Pollution Prevention Plan (SWPPP) would be required prior to construction. The SWPPP would identify appropriate best management practices (BMPs) to control erosion, sedimentation, and potential pollutant discharges during construction.

Additionally, vehicle washing activities would be required to occur in an appropriately designed area, with wash water collected and discharged or disposed of in accordance with applicable wastewater and water quality requirements. Compliance with applicable stormwater regulations, implementation of BMPs, and proper management of vehicle wash water would reduce the potential for the project to violate water quality standards or waste discharge requirements. Therefore, impacts would be less than significant.

b) Less Than Significant Impact

The proposed project would utilize an existing onsite groundwater well to provide water for domestic purposes, building operations, and vehicle washing. The project would not require the development of a new groundwater well. However, operation of the proposed headquarters and maintenance facility would result in groundwater demand associated with the proposed uses.

The project site is located within the Madera Subbasin, which is subject to the Sustainable Groundwater Management Act (SGMA). The proposed development would introduce impervious surfaces associated with buildings, parking areas, driveways, and other site improvements, which could reduce the amount of precipitation that infiltrates into the underlying soils. However, the project would be required to implement onsite drainage improvements designed to maintain post-development runoff at or below pre-development discharge rates.

The use of the existing onsite well is not anticipated to substantially decrease groundwater supplies or interfere substantially with groundwater recharge, provided that groundwater extraction remains within the capacity of the existing well and does not result in an unsustainable increase in groundwater demand. Accordingly, impacts would be less than significant.

c) The proposed project would involve construction of office buildings, a maintenance and operations building, parking areas, driveways, and associated improvements. These improvements would increase the amount of impervious surfaces on the property and could alter existing onsite drainage patterns. The project would be required to implement drainage improvements designed to maintain pre-development drainage conditions and prevent increased runoff from adversely affecting adjacent properties or County rights-of-way. The following discusses the potential drainage-related impacts.

i) Less Than Significant Impact

Construction activities, including site preparation, grading, and building construction, would temporarily expose soils to wind and water erosion. Without appropriate erosion and sediment control measures, disturbed soils could be transported offsite during storm events and result in sedimentation of adjacent properties or drainage facilities.

The project would be required to comply with applicable NPDES stormwater regulations and standards. Because the project would disturb one acre or more, a SWPPP would be required prior to construction. The SWPPP would identify and implement appropriate BMPs to minimize erosion, control sedimentation, and prevent pollutants from leaving the construction site. Additionally, the project would be required to submit detailed drainage plans and calculations prepared by a registered civil engineer for review and approval by the County Public Works Department. With implementation of these requirements, the potential for substantial erosion or siltation during construction and operation would be reduced to a less-than-significant level.

ii) Less Than Significant Impact

The proposed buildings, parking areas, driveways, and other improvements would increase impervious surfaces on the project site, potentially increasing the rate and volume of stormwater runoff. If not appropriately managed, increased runoff could contribute to localized flooding on the project site or adjacent properties.

The project would be required to ensure that post-development runoff leaving the property does not exceed pre-development discharge rates, including any runoff directed toward County rights-of-way. Surface drainage onto adjacent properties would not be permitted. Detailed drainage plans and calculations prepared by a registered civil engineer would be submitted to the County Public Works Department for review and approval. Existing onsite drainage facilities, including detention or retention basins, swales, and subsurface drainage systems, would be upgraded or modified as necessary to prevent increased runoff onto adjacent properties or County rights-of-way.

With implementation of the required drainage improvements and compliance with County drainage requirements, the project would not substantially increase surface runoff in a manner that would result in flooding on- or offsite. Impacts would be less than significant.

iii) Less Than Significant Impact

The proposed development would increase impervious surfaces and generate additional stormwater runoff from buildings, parking areas, driveways, and other developed surfaces. Without appropriate drainage infrastructure and stormwater management measures, the additional runoff could exceed the capacity of existing or planned drainage facilities or introduce pollutants into the stormwater system.

The project would be required to submit detailed drainage plans and calculations prepared by a registered civil engineer demonstrating that proposed drainage improvements would adequately accommodate project-related runoff. Existing onsite drainage facilities would be upgraded or modified as necessary to prevent increased runoff into County rights-of-way or onto adjacent properties. Additionally, the project would be required to comply with applicable NPDES stormwater regulations and implement measures to prevent or minimize stormwater

contamination from project-related pollutants. A SWPPP would be required for construction activities disturbing one acre or more.

With implementation of the required drainage improvements and stormwater pollution prevention measures, the project would not exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Impacts would be less than significant.

(iv) Less Than Significant Impact

According to Federal Emergency Management Agency (FEMA) flood hazard mapping, the project site is located within a designated Zone A flood hazard area, which is subject to inundation by the 1-percent-annual-chance flood. Development within this area could potentially alter existing drainage patterns or impede or redirect flood flows if structures or other improvements are improperly located or designed.

As a condition of project approval, the developer would be required to submit a pre-construction elevation certificate prior to issuance of building permits. A post-construction elevation certificate would also be required within 180 days of building permit issuance or prior to finalization of building permits, whichever occurs first. These requirements would help document the elevations of proposed structures in relation to applicable flood elevations. The project would also be required to comply with applicable County floodplain development and drainage requirements.

With appropriate floodplain review and implementation of required flood protection and drainage improvements, impacts associated with impeding or redirecting flood flows are anticipated to be less than significant.

(d) Less Than Significant Impact

The project site is located within a FEMA-designated Zone A flood hazard area and is therefore potentially subject to inundation during a significant flood event. The proposed project would include office buildings, a maintenance and operations facility, parking areas, and vehicle washing activities. Flooding of the site could potentially result in the release or transport of pollutants associated with vehicle washing products, vehicle fluids, or other materials used during facility operations.

The project would be required to comply with applicable County floodplain development requirements and implement appropriate drainage and stormwater management measures. The required pre-construction and post-construction elevation certificates would help document the elevations of proposed structures in relation to applicable flood elevations. Additionally, vehicle washing materials and other potentially polluting substances would be required to be properly stored and managed in accordance with applicable hazardous materials and water quality regulations. Vehicle wash water would be collected and disposed of in accordance with applicable requirements rather than discharged directly into the stormwater drainage system.

With appropriate floodplain design and implementation of measures to prevent the release of pollutants during flood conditions, the project would not result in a significant risk of pollutant releases due to inundation. Impacts would be less than significant.

(e) Less Than Significant Impact

The project site is located within the Madera Subbasin, which is subject to SGMA. The proposed project would utilize an existing onsite groundwater well to provide water for domestic purposes, building operations, and vehicle washing. The project would also generate stormwater runoff from buildings, parking areas, driveways, and other developed surfaces.

The project would be required to comply with applicable water quality regulations, including NPDES stormwater requirements, and implement appropriate BMPs to minimize erosion, sedimentation, and the discharge of pollutants. Additionally, onsite drainage improvements would be required to maintain post-development runoff at or below pre-development discharge rates and prevent drainage onto adjacent properties.

The continued use of the existing onsite well would be subject to applicable groundwater management requirements. Based on the proposed development, the project is not anticipated to conflict with or obstruct implementation of an applicable water quality control plan or sustainable groundwater management plan. Impacts would be less than significant.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
XI. LAND USE AND PLANNING Would the project:				
a) Physically divide an established community?	☐	☐	☐	☒
b) Cause a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐

Responses:

a) No Impact.

The project site is located in a rural area characterized by agricultural uses, scattered residential development, and existing industrial uses in the vicinity. The proposed project consists of two modular office buildings totaling approximately 2,880 square feet, an 8,000-square-foot maintenance and operations building, and associated parking and site improvements. The project would not involve the construction of a roadway, physical barrier, or other infrastructure that would divide an established community or impede existing access or connectivity. The proposed development would occur within the project site and would not physically divide an established community.

b) Less Than Significant Impact.

The project site is currently designated Agriculture Residential (AR) in the Madera County General Plan and is zoned Commercial Rural Highway (CRH) and Agriculture, Rural 5-Acre (AR-5). The project proposes a General Plan Amendment to change the land use designation from Agriculture Residential (AR) to Light Industrial (LI) and a Rezone to change the existing zoning designations from CRH and AR-5 to Industrial Light (IL). These amendments are necessary to accommodate the proposed headquarters and operations facility.

The project site is located in an area characterized by agricultural uses, scattered rural residences, and existing industrial development, including the Fairmead Landfill to the west. The proposed use would consolidate existing administrative, maintenance, and operational functions within a single facility. The project would be required to comply with applicable Madera County General Plan policies, zoning regulations, development standards, and conditions of approval intended to address potential environmental effects, including land use compatibility, noise, air quality, drainage, and public safety.

Approval of the proposed General Plan Amendment and Rezone would establish the appropriate land use and zoning designations for the proposed development. Based on the proposed amendments and the requirement to comply with applicable environmental protection policies and regulations, the project is not anticipated to result in 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. Therefore, impacts would be Less Than Significant.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒
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?	☐	☐	☐	☒

Responses:

a) No Impact

The proposed project consists of the development of a headquarters and operations facility on approximately 5.84 acres. According to the Madera County General Plan, commercially excavated mineral resources in the County are primarily located within the floodplains of rivers and streams, particularly along the San Joaquin River. The project site is located in the Fairmead area, east of the Fairmead Landfill, and the proposed development does not include

mineral extraction or processing activities. Based on the County's general description of mineral resource areas, the project is not anticipated to result in the loss of availability of a known mineral resource of regional or statewide value.

b) No Impact

The Madera County General Plan identifies the importance of protecting significant mineral resource areas from incompatible land uses that could restrict future extraction. The project site is not known to be designated as a locally important mineral resource recovery site, and the proposed headquarters and operations facility would not involve mineral extraction or processing. The project would therefore not be expected to result in the loss of availability of a locally important mineral resource recovery site.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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 ordinances, or applicable standards of other agencies?	☐	☐	☒	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

Responses:

a) Less Than Significant Impact.

The proposed project consists of two modular office buildings totaling approximately 2,880 square feet, an 8,000-square-foot maintenance and operations building, and associated parking for administrative staff and mobile fleet vehicles. Construction activities would result in temporary increases in ambient noise levels from the operation of construction equipment, delivery vehicles, and other associated activities. These noise sources would be temporary and would cease upon completion of construction.

Long-term operational noise would primarily be associated with employee and fleet vehicle traffic, vehicle maintenance activities, and general operations of the facility. The project site is located in a rural area characterized by agricultural uses, scattered residences, and existing industrial uses. Although operational activities may result in localized increases in noise, the project would be required to comply with applicable Madera County noise standards and General Plan policies. Construction and operational activities would also be subject to applicable restrictions on hours of operation and noise-generating activities, as required by the County.

Based on the nature of the proposed use and the requirement to comply with applicable noise regulations, the project is not anticipated to generate substantial temporary or permanent increases in ambient noise levels that would exceed applicable standards. Therefore, impacts would be Less Than Significant.

b) Less Than Significant Impact.

Construction activities may generate temporary groundborne vibration from the operation of construction equipment, particularly during site preparation, grading, and building construction. However, construction-related vibration would be temporary and localized to the project site. The project does not propose activities typically associated with substantial or sustained groundborne vibration, such as blasting, pile driving, or heavy industrial processing.

Once operational, the proposed headquarters and maintenance facility would primarily generate vibration associated with the movement and operation of passenger vehicles, fleet vehicles, and routine maintenance equipment. These activities are not anticipated to generate excessive groundborne vibration or noise levels that would adversely affect surrounding properties. Therefore, impacts would be Less Than Significant.

c) No Impact.

The project site is located approximately four miles southeast of the nearest airport and outside the applicable Airport Land Use Plan boundary. Additionally, the project site is not located within the vicinity of a private airstrip. Therefore, the proposed project would not expose employees or other individuals working at the site to excessive noise levels associated with airport operations. No impact would occur.

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

Responses:

a) Less Than Significant Impact.

The proposed project consists of establishing a headquarters and operations facility for Caglia/Redrock Environmental, including two modular office buildings totaling approximately 2,880 square feet, an 8,000-square-foot maintenance and operations building, and associated parking for administrative staff and fleet vehicles. The project does not include residential development or the construction of new housing. Rather, the project is primarily intended to consolidate and relocate existing administrative, maintenance, and operational functions to the project site.

The project is not anticipated to induce substantial unplanned population growth, as the proposed facility would primarily accommodate existing employees and operations rather than introduce a substantial new employment base that would attract additional population to the area. Although the project would provide supporting infrastructure for the proposed facility, such improvements would be limited to serving the project and would not extend infrastructure into undeveloped areas in a manner that would facilitate unplanned growth. Therefore, impacts would be Less Than Significant.

b) No Impact.

The project site is approximately 5.84 acres and is proposed for development with office, maintenance, and operations facilities. The project does not involve the demolition or removal of existing housing or the displacement of existing residents. The proposed improvements would not require the relocation of people or necessitate the construction of replacement housing elsewhere. Therefore, no impact would occur.

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

Responses:

a) i) Less Than Significant Impact

The proposed project consists of a headquarters and operations facility, including two modular office buildings totaling approximately 2,880 square feet, an 8,000-square-foot maintenance and operations building, and associated parking for administrative staff and fleet vehicles. The project would not introduce residential development or a substantial increase in the permanent population of the area. Although the proposed facility would generate a need for fire protection services, the demand is not anticipated to be substantial enough to require the construction of new or physically altered fire protection facilities. The project would be subject to applicable fire and building code requirements, including fire access, emergency vehicle access, and fire protection measures, as determined by the appropriate fire protection agency. Therefore, impacts would be Less Than Significant.

ii) Less Than Significant Impact

The proposed project would introduce an office, maintenance, and operations facility that would generate a limited demand for law enforcement services associated with employees, visitors, and facility operations. The project would not introduce a substantial residential population or otherwise result in a substantial increase in the demand for police protection services. The existing law enforcement service providers are anticipated to accommodate the limited additional demand without requiring the construction of new or physically altered police facilities. Therefore, impacts would be Less Than Significant.

iii) No Impact

The proposed project does not include residential development and would not directly or indirectly generate a substantial increase in the permanent population of school-aged children. The facility would primarily accommodate existing employees and operations. Consequently, the project would not result in an increased demand for school facilities or necessitate the construction or expansion of school facilities. No impact would occur.

iv) No Impact

The proposed project does not include residential development or generate a substantial increase in the permanent population that would result in additional demand for public parks or recreational facilities. The project does not propose the construction or expansion of parks, nor would it require the provision of new or physically altered park facilities. No impact would occur.

v) Less Than Significant Impact

The proposed project would establish an office, maintenance, and operations facility and would generate a limited demand for other public services and facilities, such as libraries and general governmental services. However, the project would not introduce a substantial residential population or create a level of demand that would require the construction of new or physically altered public facilities. The proposed development would be subject to applicable County development requirements and fees, as applicable. Therefore, impacts would be Less Than Significant.

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

Responses:

a) No Impact

The proposed project consists of a headquarters and operations facility, including office buildings, a maintenance and operations building, and associated parking. The project does not include residential development and is not anticipated to result in a substantial increase in the permanent population of the area. The facility would primarily accommodate existing employees and operations and would not generate a substantial increase in

demand for neighborhood or regional parks or other recreational facilities. Therefore, the project would not increase the use of existing recreational facilities to a degree that would result in substantial physical deterioration. No impact would occur.

b) No Impact

The proposed project does not include recreational facilities or propose the construction or expansion of existing parks or other recreational facilities. The project would not generate a demand for additional recreational facilities that would require new construction or expansion. Therefore, no impact would occur.

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

Responses:

a) Less Than Significant Impact

The proposed project consists of a headquarters and operations facility with two modular office buildings totaling approximately 2,880 square feet, an 8,000-square-foot maintenance and operations building, and associated parking for administrative staff and mobile fleet vehicles. The project site is accessed from Road 19½ and is located in a rural area where transportation is primarily accommodated by the existing roadway network.

The project would generate vehicle trips associated with employee commutes, visitors, deliveries, and fleet operations. However, the project is primarily intended to consolidate and relocate existing administrative, maintenance, and operational functions. Existing employees already commute to the immediate vicinity, and the relocation of employees and

workstations within approximately one-half mile is not anticipated to generate substantial new regional vehicle travel. The project may redistribute some local turning movements and traffic patterns in the immediate area.

The project would be required to comply with applicable County roadway access, encroachment, and circulation requirements. No conflicts with adopted transportation plans, roadway standards, or applicable policies addressing transit, bicycle, or pedestrian facilities have been identified. Therefore, impacts would be Less Than Significant.

b) Less Than Significant Impact

CEQA Guidelines Section 15064.3 identifies vehicle miles traveled (VMT) as the appropriate measure of transportation impacts, rather than automobile delay or level of service. The proposed project is primarily a relocation and consolidation of existing Caglia/Redrock Environmental operations. Existing employees already commute to the immediate project vicinity, and the relocation of employees and workstations within approximately one-half mile is not anticipated to result in substantial new regional VMT. Although the project may result in changes to local traffic circulation and turning movements, these changes would not necessarily represent an increase in overall regional vehicle travel.

Construction activities would generate temporary vehicle trips associated with workers, equipment, and material deliveries. Long-term operational trips would be associated with employee commutes, visitors, deliveries, and fleet vehicles. The project is not anticipated to result in a substantial increase in regional VMT because it would primarily relocate existing operations rather than establish an entirely new employment center.

Based on the project's relocation and consolidation purpose, impacts related to VMT are anticipated to be Less Than Significant.

c) Less Than Significant Impact

The proposed project would be accessed from Road 19½ and would include onsite parking and circulation areas to accommodate administrative staff, visitors, deliveries, and mobile fleet vehicles. The project would not introduce an inherently hazardous transportation use or require the construction of a roadway with unusual geometric features. Although the site would accommodate both passenger vehicles and larger fleet vehicles, onsite circulation and access would be subject to review by the County to ensure adequate driveway design, sight distance, turning radii, and separation of vehicle movements, as appropriate.

The project would also be required to comply with applicable County Public Works requirements and conditions of approval concerning roadway access and circulation. With implementation of these requirements, the project is not anticipated to substantially increase transportation hazards due to geometric design features or incompatible uses. Therefore, impacts would be Less Than Significant.

d) Less Than Significant Impact

The proposed project would provide access from Road 19½ and would include onsite driveways and circulation areas serving the office, maintenance, and operations buildings. The project would be subject to review by the County and applicable fire protection agency

to ensure that site access, internal circulation, and emergency vehicle access meet applicable requirements. The project would not involve the permanent closure or obstruction of existing public roadways. Construction-related activities would be temporary and would be required to maintain adequate access for emergency response vehicles.

Provided that the project complies with applicable fire access and County roadway requirements, the proposed development is not anticipated to result in inadequate emergency access. Therefore, impacts would be Less Than Significant.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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:				
i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or	☐	☐	☒	☐
ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☐	☒	☐

Responses:

a) i-ii) Less Than Significant Impact

A cultural resources records search was conducted through the Southern San Joaquin Valley Information Center (SSJVIC) for the project site and a one-half-mile surrounding area. The records search identified one previous cultural resources study within the project area, which did not identify any cultural resources. Additionally, a Sacred Lands File search

was requested through the Native American Heritage Commission (NAHC) on October 15, 2025, and negative results were received on October 17, 2025.

As part of the tribal outreach process, the NAHC provided a contact list identifying 13 California Native American tribal affiliates. These tribes were contacted by email on October 17, 2025, with follow-up telephone calls conducted on November 5, 2025. The purpose of this outreach was to identify any known tribal cultural resources within or near the project site and obtain information regarding the potential cultural significance of the area.

Based on the cultural resources records search and the negative NAHC Sacred Lands File results, no known tribal cultural resources have been identified within the project site. However, a negative Sacred Lands File search does not establish that tribal cultural resources are absent, and the information provided through tribal consultation must also be considered in determining whether resources meeting the definition of Public Resources Code Section 21074 are present.

Assuming tribal consultation is complete and no responding tribe has identified a tribal cultural resource within the project site or provided substantial evidence of a potentially affected resource, the project is not anticipated to cause a substantial adverse change in the significance of a tribal cultural resource. Therefore, impacts would be Less Than Significant.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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 stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it had adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☐	☒
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

Responses:

a) Less Than Significant Impact

The proposed project consists of two modular office buildings totaling approximately 2,880 square feet, an 8,000-square-foot maintenance and operations building, and associated parking and site improvements. The project would utilize the existing onsite water well to serve domestic and operational water demands, including vehicle washing. The project would also require electrical and telecommunications services to support the proposed office and maintenance operations.

The project would include onsite drainage improvements, as necessary, to accommodate stormwater runoff from proposed buildings, parking areas, and other impervious surfaces. Drainage improvements would be designed by a registered Civil Engineer and submitted to the County Public Works Department for review and approval. Post-development runoff would be required to remain at or below pre-development discharge rates, with no surface drainage directed onto adjacent properties.

The project may require connections to or extensions of existing utility infrastructure; however, any such improvements would be limited to serving the proposed development. No substantial relocation or expansion of regional utility facilities has been identified. Any required utility improvements would be subject to applicable agency review and permitting. Therefore, impacts would be Less Than Significant, provided that the project can be served by adequate existing utility infrastructure or that any necessary extensions are evaluated and approved.

b) Less Than Significant Impact

The project would obtain its water supply from an existing onsite water well. The well would serve the proposed office buildings, maintenance and operations building, and associated activities, including vehicle washing. The project does not propose the construction of a new water well or connection to a municipal water supply system.

The availability of sufficient water supplies would depend on the existing well's production capacity, groundwater availability, and the project's anticipated water demand. The project site is located within the Madera Subbasin, which is subject to the Sustainable Groundwater Management Act (SGMA). Although the use of an existing well would avoid the need for additional water supply infrastructure, the adequacy of the supply should be evaluated based on the anticipated operational water demand and the well's capacity, including consideration of normal, dry, and multiple dry years.

Provided that the existing well can adequately serve the project's anticipated water demand and the project complies with applicable groundwater management requirements, impacts would be Less Than Significant.

c) No Impact

The proposed project would generate wastewater primarily from restroom facilities and other domestic uses associated with the office and maintenance buildings. The project may also generate wastewater associated with vehicle washing, which would require appropriate collection and disposal.

If the project would utilize an onsite septic system, the project would not rely on a wastewater treatment provider. The septic system would be subject to review and approval by the appropriate County department to ensure adequate capacity and compliance with applicable onsite wastewater treatment requirements. Under this scenario, no impact related to the capacity of a wastewater treatment provider would occur.

d) Less Than Significant Impact

The proposed project would generate solid waste associated with office operations, employee activities, and routine maintenance activities. Construction would also generate temporary waste materials, including packaging, scrap materials, and other construction debris. Solid waste generated by the project would be required to be collected and transported to an appropriately permitted solid waste disposal or recycling facility.

The project site is located east of the Fairmead Landfill, and the proposed facility would be subject to applicable solid waste handling, recycling, and disposal requirements. The project is not anticipated to generate solid waste in quantities that would exceed the capacity of available disposal facilities or interfere with applicable solid waste reduction goals. Construction and operational waste would be managed in accordance with applicable County, State, and federal requirements. Therefore, impacts would be Less Than Significant.

e) Less Than Significant Impact

The proposed project would be required to comply with applicable federal, State, and local regulations governing solid waste management and reduction, including applicable requirements for waste collection, recycling, diversion, and disposal. Construction and operational solid waste would be required to be handled and disposed of at appropriately permitted facilities. The project would also be subject to applicable construction and demolition waste diversion requirements and other solid waste management standards, as applicable. Therefore, the project would comply with applicable solid waste management and reduction regulations, and impacts would be Less Than Significant.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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?	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	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?	☐	☐	☒	☐
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☒	☐
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☒	☐

Responses:

a) Less Than Significant Impact

The proposed project consists of a headquarters and operations facility with two modular office buildings totaling approximately 2,880 square feet, an 8,000-square-foot maintenance and operations building, and associated parking and circulation areas. The project site is located in a rural area and would be accessed from Road 19½. The project does not propose the permanent closure or obstruction of any public roadway or evacuation route. Construction activities may result in temporary increases in traffic associated with construction workers, equipment, and material deliveries; however, these activities would not be expected to substantially impair emergency response or evacuation operations. The project would be required to maintain adequate emergency vehicle access and comply with applicable County and fire protection agency requirements. Therefore, impacts would be Less Than Significant.

b) Less Than Significant Impact

The project site is located within a Local Responsibility Area (LRA) and is not located within a State Responsibility Area (SRA). Based on the applicable fire hazard severity zone mapping, the project site is not identified within a designated LRA Fire Hazard Severity Zone. The project site is located in a relatively rural area characterized by agricultural uses, scattered residential development, and existing industrial uses. The proposed development would consist primarily of office, maintenance, and operations buildings and associated parking.

Although wildfires may occur in the surrounding region, the project site is not located within an identified high or very high fire hazard severity zone. The proposed development would be required to comply with applicable building and fire safety requirements, including fire access and defensible space standards, as applicable. The project is not anticipated to substantially exacerbate wildfire risk or expose occupants to significant wildfire-related

pollutant concentrations or uncontrolled wildfire spread. Therefore, impacts would be Less Than Significant.

c) Less Than Significant Impact

The proposed project would require onsite access, utility connections, and associated infrastructure to support the proposed office, maintenance, and operations facilities. These improvements would be limited to serving the project site and would not involve the construction of substantial new offsite infrastructure, such as regional roadways, transmission lines, or fuel breaks. Any required utility extensions, access improvements, or fire protection infrastructure would be subject to applicable County and agency review and permitting requirements. Construction and maintenance of these improvements would be required to comply with applicable fire safety standards and environmental regulations. Therefore, the project is not anticipated to require infrastructure improvements that would substantially exacerbate wildfire risk or result in significant temporary or ongoing environmental impacts. Impacts would be Less Than Significant.

d) Less Than Significant Impact

The project site is located within FEMA-designated Flood Zone A, indicating potential exposure to flooding during a 100-year flood event. The proposed project would introduce additional impervious surfaces associated with the office buildings, maintenance and operations building, parking areas, and other site improvements. Increased impervious surfaces may alter existing drainage patterns and runoff characteristics.

To address potential drainage impacts, the project would be required to ensure that post-development runoff does not exceed pre-development discharge rates, including flows directed toward the County right-of-way, and that surface drainage is not directed onto adjacent properties. Detailed drainage plans and calculations prepared by a registered Civil Engineer would be submitted to the County Public Works Department for review and approval. Existing onsite drainage facilities would be upgraded or modified as necessary to accommodate the proposed development and prevent increased runoff onto adjoining properties or County rights-of-way. The applicant would also be required to submit a pre-construction elevation certificate prior to issuance of building permits and a post-construction elevation certificate within 180 days of permit issuance or before building permit finalization, whichever occurs first.

The project site is relatively flat and is not anticipated to be susceptible to landslides or post-fire slope instability. With implementation of the required drainage improvements and compliance with applicable floodplain development requirements, the project is not anticipated to expose people or structures to significant risks associated with runoff, post-fire slope instability, or drainage changes. Therefore, impacts would be Less Than Significant.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	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?	☐	☒	☐	☐
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	☐	☐	☒	☐
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

Responses:

a) Less Than Significant With Mitigation Incorporated

The project site consists of approximately 5.84 acres and is proposed for development with two modular office buildings totaling approximately 2,880 square feet, an 8,000-square-foot maintenance and operations building, and associated parking and site improvements. The project would result in permanent disturbance of the project site.

The biological resources assessment identified the potential for nesting birds and Swainson's hawk to occur within or near the project site. Construction activities, particularly during the nesting season, could result in direct impacts to active nests, including nest abandonment, injury, or mortality of birds. However, implementation of BIO-MM-1a through BIO-MM-6 would require appropriate construction timing, preconstruction surveys, and avoidance buffers around active nests. With implementation of these mitigation measures, potential impacts to nesting birds and Swainson's hawk would be reduced to less than significant.

The biological assessment determined that impacts to other special-status plant and animal species, sensitive natural communities, wildlife movement corridors, and jurisdictional waters would be absent or less than significant due to existing site conditions and the lack of suitable habitat.

A cultural resources records search identified one previous study within the project area that did not identify cultural resources. The NAHC Sacred Lands File search also returned negative results. Tribal outreach was conducted with 13 tribal affiliates identified by the

NAHC. Any tribal consultation responses and recommendations, along with applicable inadvertent discovery procedures, would be considered and implemented as appropriate. In the event that previously unidentified archaeological resources, tribal cultural resources, or human remains are discovered during construction, applicable regulatory procedures would be followed to avoid or minimize impacts.

With implementation of the identified biological mitigation measures and compliance with applicable cultural resources requirements, the project would not substantially degrade the quality of the environment, substantially reduce wildlife habitat or populations, threaten the elimination of plant or animal communities, or eliminate important examples of California history or prehistory. Therefore, impacts would be Less Than Significant With Mitigation Incorporated.

b) Less Than Significant Impact

The proposed project would result in site-specific environmental effects associated with construction and operation of the headquarters and operations facility. Potential impacts include temporary construction emissions and noise, operational vehicle activity, stormwater runoff, water consumption, solid waste generation, and potential impacts to biological and cultural resources. These impacts would be addressed through applicable regulatory requirements, project design features, conditions of approval, and the mitigation measures identified in this Initial Study.

The project is primarily intended to consolidate and relocate existing administrative, maintenance, and operational functions. Existing employees already commute within the immediate project vicinity, and the relocation of employees and workstations within approximately one-half mile is not anticipated to generate substantial new regional vehicle miles traveled. Additionally, the project would be required to implement drainage controls, comply with applicable air quality and stormwater regulations, and incorporate biological mitigation measures to reduce potentially significant site-specific impacts.

Although other existing and reasonably foreseeable development in the surrounding area may contribute to cumulative effects, the project's incremental contributions would be limited by its relatively small development footprint, the relocation and consolidation of existing operations, and compliance with applicable environmental requirements. The project is not anticipated to make a cumulatively considerable contribution to any significant cumulative environmental impact. Therefore, cumulative impacts would be Less Than Significant.

c) Less Than Significant Impact

The proposed project would involve construction and operation of office, maintenance, and operations facilities. Potential effects on human beings could include temporary construction noise and dust, operational noise, vehicle emissions, increased traffic, hazardous materials associated with vehicle maintenance and washing, and potential flooding due to the site's location within FEMA-designated Flood Zone A.

These potential effects would be addressed through compliance with applicable County, State, and federal regulations, including construction and operational air quality requirements, applicable noise standards, hazardous materials handling and disposal requirements, engineered drainage improvements, and floodplain development

requirements. The project would also be subject to applicable fire and emergency access standards. Biological impacts to nesting birds and Swainson's hawk would be reduced through implementation of the identified mitigation measures.

With implementation of the applicable regulatory requirements, project conditions, and mitigation measures identified in this Initial Study, the project is not anticipated to result in environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly. Therefore, impacts would be Less Than Significant.

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LIVE OAK
ASSOCIATES, INC.

BIOLOGICAL EVALUATION
CAGLIA DEVELOPMENT PROJECT
MADERA COUNTY, CALIFORNIA



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November 11, 2025 PN 3005-01

EXECUTIVE SUMMARY

Live Oak Associates, Inc. (LOA) investigated the biological resources of an approximately 6-acre property ("project site") proposed for commercial development ("project") and evaluated potential project impacts to those resources pursuant to the California Environmental Quality Act (CEQA). The project site is located in Madera County, immediately adjacent to the community of Fairmead.

On October 23, 2025, LOA biologist Jeff Gurule surveyed the project site for its biotic habitats, the plants and animals occurring in those habitats, and significant habitat values that may be protected by state and federal law. At the time of the field survey, the project site consisted of a ruderal field that appeared to be used for sheep or goat grazing. The field contained an area of remnant landscape trees near its southwest corner, where several residential and/or commercial buildings were once located. Lands within the vicinity of the project site include the State Route 99 corridor, agricultural land, and the Fairmead Landfill.

Potentially significant project impacts to biological resources and recommended mitigation measures are as follows:

- *Nesting Birds.* Project construction during the bird nesting season could result in nest failure and bird mortality, which would violate the Migratory Bird Treaty Act and California Fish and Game Code and constitute a significant project impact per the provisions of CEQA. Should project construction occur during the bird nesting season (February through August), construction activities shall be preceded by preconstruction surveys for active nests. Construction activities shall avoid active nests by appropriate buffers until the young have fledged.

- *Swainson's Hawk.* Project construction during the Swainson's hawk nesting season could result in nest destruction or compromised nesting success, should Swainson's hawks be nesting on or near the project site. These impacts, if they occur, would violate the California Endangered Species Act and other laws and constitute a significant project impact under CEQA. If project construction is to occur between March 1 through August 31, protocol-level surveys for nesting Swainson's hawks will be conducted, and any Swainson's hawk nests that are discovered will be avoided by an appropriate buffer until the young have fledged.

The project will either have no impact or a less than significant impact, as defined by CEQA, on the following biotic resources: Special status plant species; special status animal species that would not likely use the site (i.e., the project site is outside their typical range or habitats of the site are not suitable for them); special status animal species that may occasionally use habitats of the project site for cover and foraging; wildlife movement corridors; sensitive natural communities and designated critical habitat; and waters of the State or U.S. The project is not in conflict with any habitat conservation plans or local policies.

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1.0 INTRODUCTION

This report, prepared by Live Oak Associates, Inc. (LOA), describes the biological resources of an approximately 6-acre area ("project site" or "site") proposed for development by Caglia Environmental ("project"), and assesses potential project-related impacts to those resources. The project site is located in Madera County, California, near the community of Fairmead (Figure 1). The project site is defined by two adjacent parcels, APN's 027-092-024 & 027-201-022. The site can be found on the Berenda U.S. Geological Survey (USGS) 7.5-minute quadrangle, Section 11 and 14, Township 10 South, Range 16 East; Mount Diablo Base and Meridian (Figure 2).

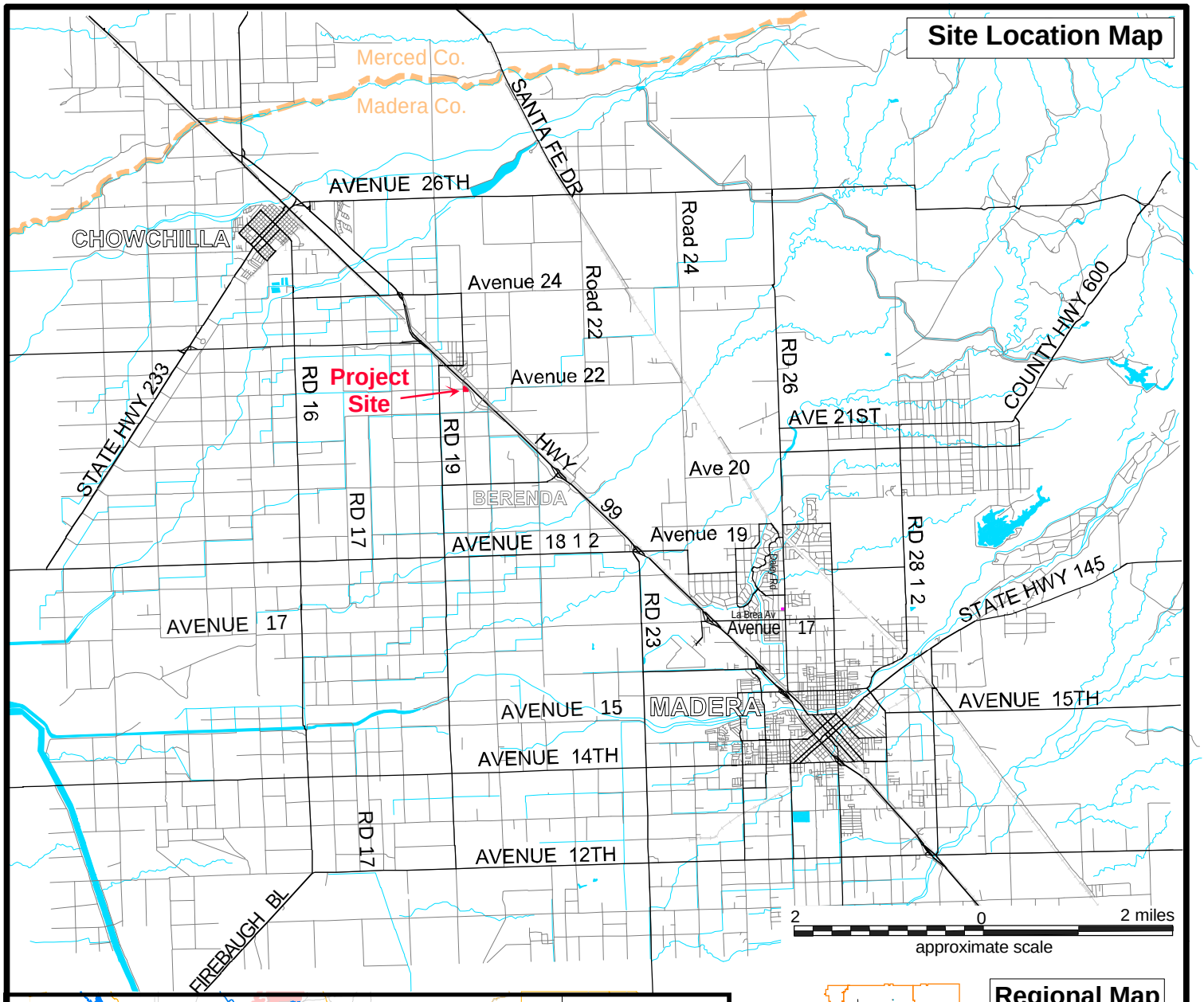
1.1 PROJECT DESCRIPTION

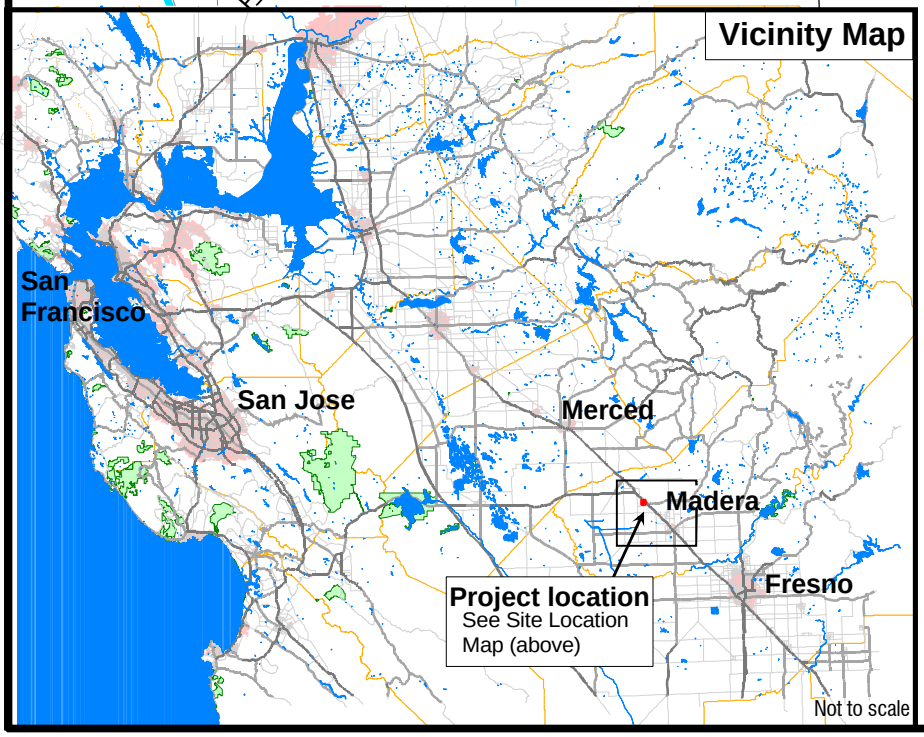
The project is the conversion of two vacant lots to a Caglia Environmental facility consisting of offices, a workshop, storage, parking, detention basins, water tank, and utilities.

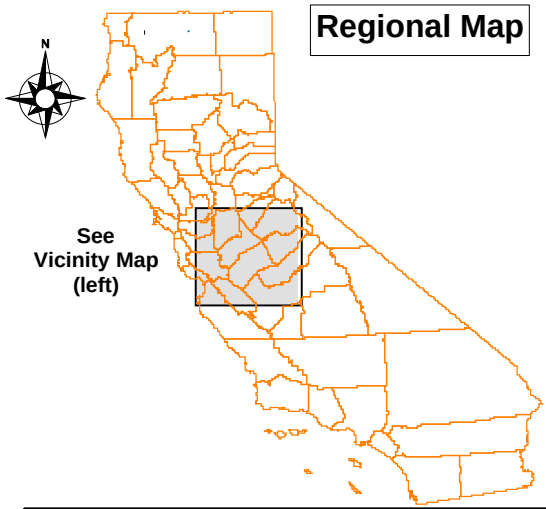
1.2 REPORT OBJECTIVES

This report addresses issues related to 1) sensitive biotic resources occurring on the project site, 2) the federal, state, and local laws regulating such resources, and 3) mitigation measures that may be required to reduce the magnitude of anticipated project-related impacts and/or comply with permit requirements of state and federal resource agencies. As such, the objectives of this report are to:

- Summarize all site-specific information related to existing biological resources.
- Make reasonable inferences about the biological resources that could occur on site based on habitat suitability and the proximity of the site to a species' known range.
- Summarize all state and federal natural resource protection laws that may be relevant to future site development.
- Identify and discuss project impacts to biological resources likely to occur on the site within the context of CEQA and state or federal laws.





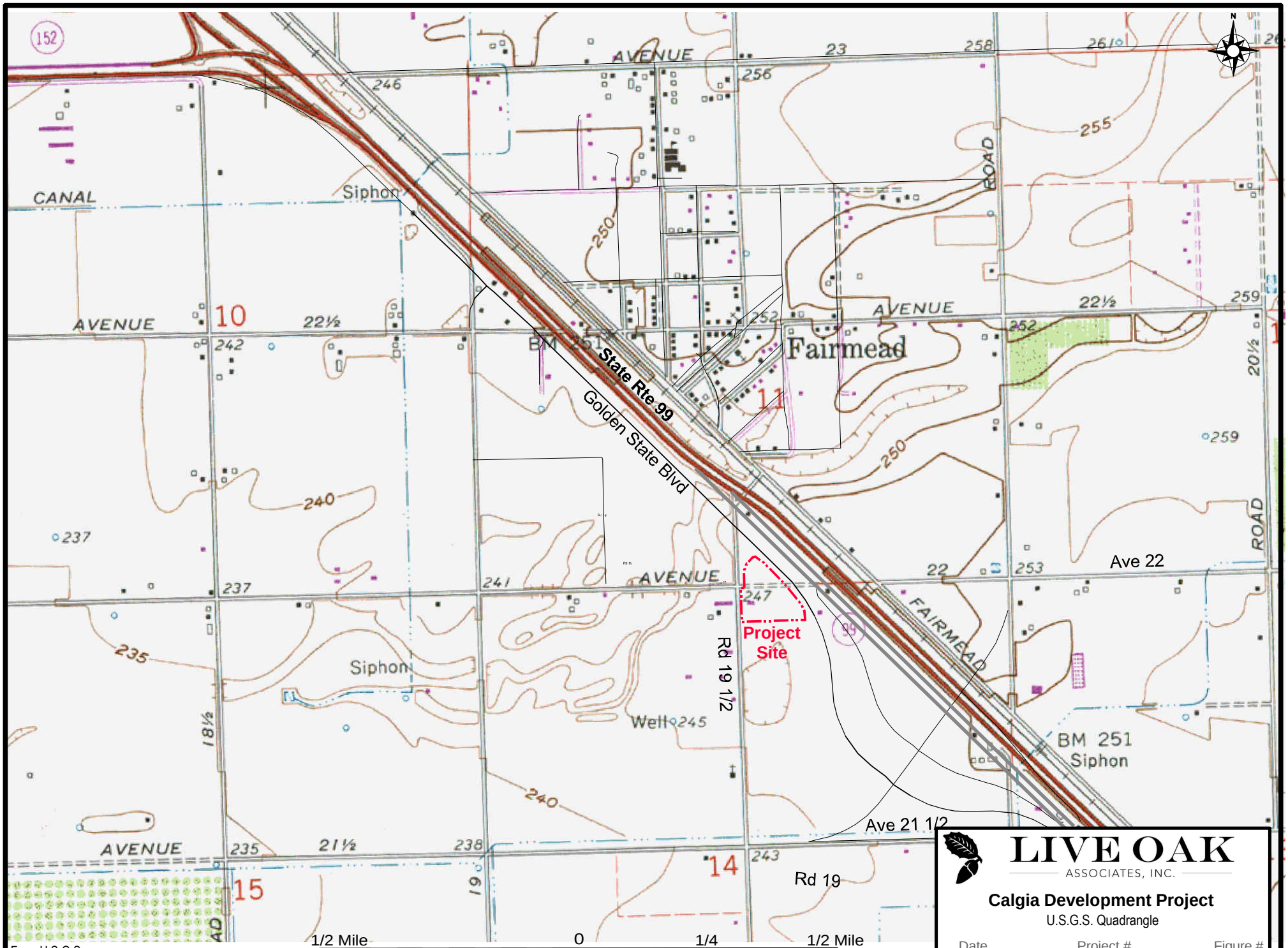


LIVE OAK ASSOCIATES, INC.

Calgia Development Project

Site / Vicinity Map

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From U.S.G.S.
Berenda 7-1/2' Quadrangle 1987

LIVE OAK ASSOCIATES, INC.

Calgia Development Project

U.S.G.S. Quadrangle

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- Identify avoidance, minimization, and/or mitigation measures that would reduce the magnitude of project impacts in a manner consistent with the requirements of CEQA and that are generally consistent with the requirements of the resource agencies regulating affected biological resources.

1.4 STUDY METHODOLOGY

The analysis of impacts, as discussed in Section 3.0 of this report, is based on the known and potential biotic resources of the project site (discussed in Section 2.0). Sources of information used in the preparation of this analysis include: (1) the *California Natural Diversity Data Base* (CDFW 2025); (2) the *Inventory of Rare and Endangered Vascular Plants of California* (CNPS 2025); (3) manuals, reports, and references related to plants and animals of the Sierra Nevada foothills region; and (4) other available planning documents and biological studies from the general project vicinity. A field survey of the project site was conducted on October 23, 2025, by LOA biologist Jeff Gurule. The surveys entailed a systematic walk across the project site to ensure full visual coverage of the site, while noting principal land uses and associated plant and animal species, and mapping habitat suitable for special status species and other sensitive or protected biological resources.

2.0 EXISTING CONDITIONS

2.1 REGIONAL SETTING

The project site is located within the eastern half of the San Joaquin Valley, south and west of the lowest foothills of the Sierra Nevada. The site is situated adjacent to the community of Fairmead in a matrix of intensive agricultural, industrial, residential, and other anthropogenic uses. Immediately surrounding land uses are the Fairmead Landfill, orchard, agricultural field, and the State Route (SR) 99 transportation corridor. The project site is situated between two regionally occurring drainages, Berenda Creek approximately 3.5 mile to the southeast and Berenda Slough approximately 3.2 miles to the northwest.

Average annual precipitation in the general vicinity is approximately 12 inches, 85% of which falls between the months of October and March. Storm-water runoff is expected to readily infiltrate into the onsite soils.

2.2 PROJECT SITE

At the time of LOA's survey, the project site consisted of a field that appeared to be used for sheep or goat grazing, as evidenced by droppings and perimeter fencing. The site historically contained several residential and/or commercial buildings; these were removed sometime after May 2024. The site has also experienced ongoing disturbance through periodic scraping and discing. The site is relatively flat with an elevation of approximately 245 feet above sea level (Figure 2).

Soils of the site comprise the following soil mapping units:

- SaA: San Joaquin sandy loam, 0 to 3 percent slopes (3295867)
- RaA: Ramona sandy loam, 0 to 3 percent slopes (463490)

Soils on the site are classified as hydric and in natural conditions can support wetlands within topographic depressions, where saturation, flooding, or ponding create anaerobic soil conditions. Hydric soils along with the presence of hydrophytic vegetation and wetland hydrology are used to define wetlands. Despite the presence of hydric soils on the site, onsite soils have been

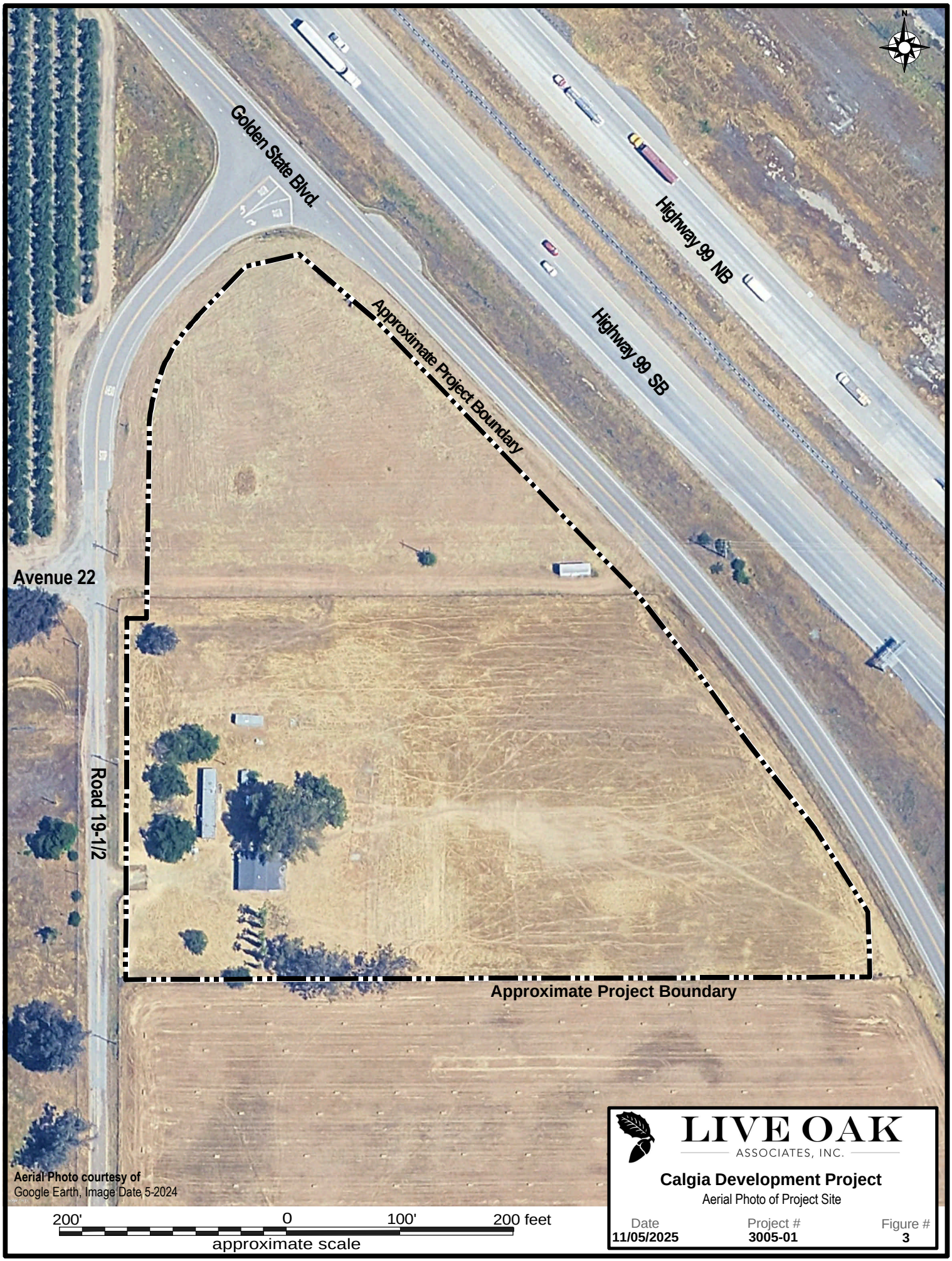
significantly disturbed from human activity that has almost certainly included grading of the site, which would have eliminated any topographic depressions that may have historically created wetlands on the site. Wetland vegetation was not found on the site and defined wetland areas were not observed on the site during LOA's field survey.

2.3 BIOTIC HABITATS

The project site contains a single biotic habitat/land use characterized as ruderal field. An aerial view of the site is presented in Figure 3. A list of vascular plants identified on the site is presented in Appendix A. A list of terrestrial vertebrates using or potentially using the project site is presented in Appendix B. Representative photos of the site are presented in Appendix C.

At the time of the site survey, the site's ruderal field showed signs of past scraping and discing, as well as evidence of residential and/or commercial infrastructure such as building pads and ornamental trees. Examples of these trees include white mulberry (*Morus alba*), red gum (*Eucalyptus camaldulensis*), tree of heaven (*Ailanthus altissima*), and Mexican fan palm (*Washingtonia robusta*). Aside from the ornamental trees, vegetation consisted of a mix of common native and non-native herbaceous vegetation. Species observed comprised red stemmed filaree (*Erodium cicutarium*), short-podded mustard (*Hirschfeldia incana*), vinagerweed (*Trichostema lanceolatum*), common spikeweed (*Centromadia pungens*), doveweed (*Croton setiger*), jimsonweed (*Datura wrightii*), field foxtail barley (*Hordeum murinum*), ripgut brome (*Bromus diandrus*), and wild oats (*Avena sp.*), among others.

The site's ruderal field is of moderate habitat value for some native wildlife species that have adapted to make use of such lands of the region. However, the suitability of the site for most native wildlife species is greatly limited by its long history of anthropogenic use, lack of aquatic habitat, and proximity to urban and agricultural development. Amphibians are expected to be absent from the project site due to the absence of aquatic habitat on or near the site. A limited number of common reptile species such as the western fence lizard (*Sceloporus occidentalis*) (observed), common side-blotched lizard (*Uta stansburiana*), Pacific gopher snake (*Pituophis catenifer catenifer*), and western rattlesnake (*Crotalus viridis*) may occur on the site.



Aerial Photo courtesy of
Google Earth, Image Date 5-2024

200' 0 100' 200 feet
approximate scale

LIVE OAK
ASSOCIATES, INC.

Calgia Development Project
Aerial Photo of Project Site

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Foraging habitat for a number of avian species occurs on the site, and the site's trees may support nesting. Birds expected to utilize the site include mourning doves (*Zenaida macroura*) (observed), savannah sparrows (*Passerculus sandwichensis*) (observed), western kingbirds (*Tyrannis verticalis*), California scrub jays (*Aphelocoma californica*) (observed), yellow-rumped warblers (*Setophaga coronata*) (observed), rock doves (*Columba livia*) (observed), and European starlings (*Sturnus vulgaris*) (observed). Birds of prey potentially utilizing the site include American kestrels (*Falco sparverius*), red-tailed hawks (*Buteo jamaicensis*) (observed), and Swainson's hawks (*Buteo swainsoni*).

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

2.4 SPECIAL STATUS PLANTS AND ANIMALS

Many species of plants and animals within the state of California have low populations, limited distributions, or both. Such species may be considered "rare" and are vulnerable to extirpation as the state's human population grows and the habitats these species occupy are converted to agricultural and urban uses. As described more fully in Section 3.2, state and federal laws have provided the CDFW and the U.S. Fish and Wildlife Service (USFWS) with a mechanism for conserving and protecting the diversity of plant and animal species native to the state. A sizable number of native plants and animals have been formally designated as threatened or endangered under state and federal endangered species legislation. Others have been designated as "candidates" for such listing. Still others have been designated as "species of special concern" by the CDFW. The California Native Plant Society (CNPS) has developed its own set of lists (i.e., California Rare Plant Ranks, or CRPR) of native plants considered rare, threatened, or endangered (CNPS 2025). Collectively, these plants and animals are referred to as "special status species."

The California Natural Diversity Data Base (CNDDB) was queried for special status plant and animal occurrences in the nine USGS 7.5-minute quadrangles containing and surrounding the

project site: *Berenda, Chowchilla, Kismet, Bonita Ranch, Madera, Firebaugh NE, Plainsburg, Le Grand, Raynor Creek.* A number of special status plants and animals were returned in the query and are summarized below in Table 1. Sources of information for this table included *California's Wildlife, Volumes I, II, and III* (Zeiner et. al 1988-1990), *California Natural Diversity Data Base* (CDFW 2025), *The Jepson Manual: Vascular Plants of California, second edition* (Baldwin et al 2012), the *California Native Plant Society's Inventory of Rare and Endangered Vascular Plants of California* (CNPS 2025), *Calflora.org,* and *eBird.org*.

TABLE 1. LIST OF SPECIAL STATUS SPECIES POTENTIALLY OCCURRING IN THE PROJECT VICINITY

PLANTS

Species Listed as Threatened or Endangered under the State and/or Federal Endangered Species Act

Species	Status	Habitat/Range	*Occurrence within the Project Site
Succulent Owl's Clover (*Castilleja campestris* ssp. *succulenta*)	FT, CE CRPR 1B	Occurs in vernal pools and swales in valley foothills and grasslands of the San Joaquin and Sacramento Valleys from Fresno Co. on the south to Solano County on the north; blooms April to May.	**Absent**. Suitable habitat in the form of vernal pools is absent from the site and immediately surrounding lands.
Palmate-Bracted Bird's-Beak (*Chloropyron palmatum*)	FE, CE CRPR 1B	Occurs in chenopod scrub, valley and foothill grassland. Usually on Pescadero silty clay which is alkaline.	**Absent**. Suitable habitat and soils are absent from the project site.
San Joaquin Valley Orcutt Grass (*Orcuttia ineaqualis*)	FT, CE CRPR 1B	Occurs in deep vernal pools of California's San Joaquin Valley; blooms April to September.	**Absent**. Suitable habitat in the form of vernal pools is absent from the site and immediately surrounding lands.
Hairy Orcutt Grass (*Orcuttia pilosa*)	FE, CE CRPR 1B	Occurs in deep vernal pools of California's San Joaquin Valley; blooms May to September.	**Absent**. Suitable habitat in the form of vernal pools is absent from the site and immediately surrounding lands.
Greene's Tuctoria (*Tuctoria greenei*)	FE CRPR 1B	Occurs in vernal pools of California's Central Valley from Shasta Co. on the north to Tulare Co. on the south; blooms May to September.	**Absent**. Suitable habitat in the form of vernal pools is absent from the site and immediately surrounding lands.

CNPS-listed Species

Heartscale (*Atriplex cordulata var. cordulata*)	CRPR 1B	Occurs in saline and alkaline soils of shadscale scrub, valley grassland, and wetland-riparian habitats. Blooms April to October.	**Absent.** Past human disturbances of the site have created unsuitable habitat conditions for this species. Suitable soils are absent. No *Atriplex* species were observed on the site during the field survey.
Lesser Saltscale (*Atriplex minuscula*)	CRPR 1B	Occurs in sandy, alkaline soils of alkali sinks and grasslands. Blooms May to October.	**Absent.** Past human disturbances of the site have created unsuitable habitat conditions for this species. Suitable soils are absent. No *Atriplex* species were observed on the site during the field survey.
Vernal Pool Smallscale (*Atriplex persistens*)	CRPR 1B	Occurs in vernal pools on alkaline soils. Blooms June-October.	**Absent**. Suitable habitat in the form of vernal pools is absent from the site and immediately surrounding lands. Suitable soils are absent. No *Atriplex* species were observed on the site during the field survey.
Subtle Orache (*Atriplex subtilis*)	CRPR 1B	Occurs in valley and foothill grasslands of the San Joaquin Valley on alkaline soils. Blooms August-October.	**Absent.** Past human disturbances of the site have created unsuitable habitat conditions for this species. Suitable soils are absent. No *Atriplex* species were observed on the site during the field survey.
Hoover's Calycadenia (*Calycadenia hooveri*)	CRPR 1B	Found in rocky soils, frequently of the Hornitos series, in Calaveras, Madera, Mariposa, and Stanislaus Counties between 215 - 985 feet. Blooms July-Sept.	**Absent.** Past human disturbances of the site have created unsuitable habitat conditions for this species. Suitable rocky soils are absent from the project site.
Hoover's Cryptantha (*Cryptantha hooveri*)	CRPR 1A	Found in coarse sand within valley and foothill grassland and inland dunes between 30 - 490 feet. Blooms April and May.	**Absent.** Past human disturbances of the site have created unsuitable habitat conditions for this species. Suitable sandy soils are absent from the project site.

TABLE 1. LIST OF SPECIAL STATUS SPECIES POTENTIALLY OCCURRING IN THE PROJECT VICINITY

PLANTS (cont.)

CNPS-listed Species

Species	Status	Habitat	*Occurrence within the Project Site
Spiny-sepaled Button Celery (*Eryngium spinosepalum*)	CRPR 1B	Found in vernal pools and swales at the eastern edge of the San Joaquin Valley. Blooms April to May.	**Absent.** Past human disturbances of the site have created unsuitable habitat conditions for this species. Vernal pools and other suitable wetland features are absent from the site.
Recurved Larkspur (*Delphinium recurvatum*)	CRPR 1B	Occurs in alkaline soils of cismontane woodland and valley and foothill grasslands. Blooms March-June.	**Absent.** Past human disturbances of the site have created unsuitable habitat conditions for this species. Suitable soils are absent.
Alkali-Sink Goldfields (*Lasthenia chrysantha*)	CRPR 1B	Occurs in alkaline vernal pools. Blooms Feb to June.	**Absent**. Suitable habitat in the form of vernal pools is absent from the site and immediately surrounding lands.
Madera Leptosiphon (*Leptosiphon serrulatus*)	CRPR 1B	Occurs in openings in cismontane woodland and lower coniferous forest between 985 and 4265 feet in elevation. Blooms April-May	**Absent.** Suitable habitat is absent from the project site, and the site is situated below this species' elevational range.
Munz's Tidy-Tips (*Layia munzii*)	CRPR 1B	Hillsides, in white-grey alkaline clay soils, w/grasses and chenopod scrub associates between 490 - 2295 feet in elevation. Blooms March-April.	**Absent.** Suitable habitat is absent from the project site, and the site is situated below this species' elevational range.
Shining Navarretia *(Navarretia nigelliformis ssp. radians)*	CRPR 1B	Occurs in cismontane woodland, vernal pools, and valley and foothill woodland between 215 - 3280 feet. Blooms May to July.	**Absent.** Past human disturbances of the site have created unsuitable habitat conditions for this species.
Merced Phacelia (*Phacelia ciliate var. opaca*)	CRPR 1B	Occurs in heavy clay soils of the Central Valley and low foothills of the Sierra Nevada. Blooms February to May.	**Absent.** Past human disturbances of the site have created unsuitable habitat conditions for this species. Suitable soils are absent.
California Alkali Grass (*Puccinellia simplex*)	CRPR 1B	Occurs in alkali sinks and flats within grassland and chenopod scrub habitats of the Central Valley, San Francisco Bay area and western Mojave Desert; elevations below 3,000 feet. Blooms March-May.	**Absent.** Past human disturbances of the site have created unsuitable habitat conditions for this species. Suitable soils are absent.

ANIMALS

Species Listed as Threatened or Endangered under the State and/or Federal Endangered Species Act

Vernal Pool Fairy Shrimp (*Branchinecta lynchi*)	FT	Primarily found in vernal pools of California's Central Valley.	**Absent**. Suitable habitat in the form of vernal pools is absent from the site and immediately surrounding lands.
Vernal Pool Tadpole Shrimp (*Lepidurus packardi*)	FE	Primarily found in vernal pools of California's Central Valley.	**Absent**. Suitable habitat in the form of vernal pools is absent from the site and immediately surrounding lands.
Valley Elderberry Longhorn Beetle (*Desmocerus californicus dimorphus*)	FT	Lives in mature elderberry shrubs of California's Central Valley and Sierra foothills.	**Absent.** Blue elderberry shrubs required by this species are absent from the site. Furthermore, the current opinion of the USFWS is that Madera County is outside the range of this subspecies.

TABLE 1. LIST OF SPECIAL STATUS SPECIES POTENTIALLY OCCURRING IN THE PROJECT VICINITY

ANIMALS (cont.)

Species Listed as Threatened or Endangered under the State and/or Federal Endangered Species Act

Species	Status	Habitat	*Occurrence within the Project Site
Crotch Bumble Bee (*Bombus crotchii*)	CCE	A species of open grassland and scrub habitats, the Crotch bumble bee historically ranged throughout central and southern California. Widespread conversion of grassland to agricultural and urban uses has led to its near-extirpation from the Central Valley. Where present, it is associated with remnant grassland and scrub habitats supporting food plants of the *Asclepias, Chaenactis, Lupinus, Medicago, Phacelia,* and *Salvia* genera (Williams et al. 2014).u	**Unlikely.** The site is located in a portion of the Central Valley in which the Crotch bumblebee now appears to be absent. Anthropogenic uses of surrounding lands would not attract this species to the area, and anthropogenic uses of the site, itself, have resulted in marginal habitat for this species.
California Tiger Salamander (*Ambystoma californiense*)	FT CT	Found primarily in annual grasslands; requires vernal pools for breeding and rodent burrows for refuge.	**Absent.** Suitable breeding habitat in the form of large vernal pools are absent from the site and surrounding lands.
Western Spadefoot (*Spea hammondii*)	FPT CSC	Primarily occurs in grasslands, but also occurs in valley and foothill hardwood woodlands. Requires vernal pools or other temporary pools for breeding.	**Absent.** Suitable breeding habitat in the form of vernal pools or other temporary bodies of water are absent from the site and surrounding lands.
Blunt-Nosed Leopard Lizard (*Gambelia silus*)	FE, CE, CFP	Frequents grasslands, alkali meadows and chenopod scrub of the San Joaquin Valley from Merced County south to Kern County.	**Absent.** Suitable habitat is absent from the project site and surrounding lands.
Bald Eagle (*Haliaeetus leucocephalus*)	CE, CFP	Winters near reservoirs of California's Central Valley. Mostly feeds on fish in large bodies of water or rivers.	**Absent.** Suitable foraging and nesting habitat are absent from the project site.
Swainson's Hawk *(Buteo swainsoni*)	CT	Summer migrant in the Central Valley. Forages in grasslands and fields close to riparian areas.	**Possible.** This species has been documented in the project vicinity (eBird 2025, iNaturalist 2025). A suitable nest tree occurs on the project site in the form of a large eucalyptus. However, no stick nests were observed in this tree or any other trees on the project site. The nearest stick nest found during the survey was approximately 350 feet southwest of the project site in a eucalyptus tree within the Fairmead Landfill compound. The project site provides suitable foraging habitat for this species.
Tricolored Blackbird (*Agelaius tricolor*)	CT	Breeds colonially near fresh water in dense bulrush, cattails, or thickets of willows or shrubs. Occasionally nests in wheat fields. Forages in a wide variety of habitats.	**Possible.** Suitable nesting habitat is absent from the site. The site provides potential foraging habitat.
Fresno Kangaroo Rat (*Dipodomys nitratoides exilis*)	FE, CE	Inhabits grassland on gentle slopes of generally less than 10°, with friable, sandy-loam soils.	**Absent.** The project site provides unsuitable habitat for this species. This species is considered extirpated from Madera County (ESRP 2023). No kangaroo rat burrows or sign were observed anywhere on the site.

TABLE 1. LIST OF SPECIAL STATUS SPECIES POTENTIALLY OCCURRING IN THE PROJECT VICINITY

ANIMALS (cont.)

Species Listed as Threatened or Endangered under the State and/or Federal Endangered Species Act

Species	Status	Habitat	*Occurrence within the Project Site
San Joaquin Kit Fox (*Vulpes macrotis mutica*)	FE, CT	Desert alkali scrub, annual grasslands of California's San Joaquin Valley and Tulare Basin, extending west into San Luis Obispo County. This species may forage in adjacent agricultural habitats.	**Unlikely.** The site provides marginal habitat for this species. The site is surrounded by many square miles of agricultural lands and urban development unsuitable for San Joaquin kit fox. No populations of San Joaquin kit fox are known to occur in this portion of Madera County. No sign of kit fox use was observed during the field survey of the site.

State Species of Special Concern

Coast Horned Lizard (*Phrynosoma blainvillii*)	CSC	Occurs in a wide variety of habitats. Most common in lowlands along sandy washes with scattered low bushes where there are open areas for sunning, bushes for cover, patches of loose soil for burial, and abundant supply of ants and other insects.	**Unlikely.** Habitat for this species is marginal on the site due to anthropogenic uses of the site, lack of bushes, loose soils, and lack of native ants, which are the primary food for this species.
Northern Harrier (*Circus hudsonius*)	CSC	Frequents meadows, grasslands, open rangelands; uncommon in wooded habitats. Nests on the ground in tall concealing emergent or upland vegetation.	**Possible.** This species may occasionally forage on and over the site. Nesting habitat is absent from the site.
Burrowing Owl (*Athene cunicularia*)	CSC	Found in open, dry grasslands, deserts and ruderal areas; requires ground squirrel burrows for cover and nesting.	**Unlikely.** Although the site provides potential foraging and nesting habitat for the burrowing owl, it represents a very small patch of habitat in a matrix of largely incompatible uses including the community of Fairmead, the Fairmead Landfill, SR 99, and orchards. As such, it is unlikely to be used by burrowing owls. No sign of burrowing owl occupation of the site was observed during LOA's site survey, and no burrowing owl records are known from the vicinity of Fairmead (CDFW 2025, eBird 2025, iNaturalist 2025).
American Badger (*Taxidea taxus*)	CSC	This species inhabits open and dry sections of grasslands, shrub, and forest habitats with friable soil.	**Absent.** The project site provides unsuitable habitat for this species due to anthropogenic uses of the site and surrounding lands. No evidence of badger occupation was observed during LOA's field survey.

***** Explanation of Occurrence, Designations, and Status Codes

Present: Species observed on the site at time of field surveys or during recent past.
Likely: Species not observed on the site, but it may reasonably be expected to occur there on a regular basis.
Possible: Species not observed on the site, but it could occur there from time to time.
Unlikely: Species not observed on the site, and would not be expected to occur there except, perhaps, as a transient
Absent: Species not observed on the Site and precluded from occurring there because habitat requirements not met.

STATUS CODES

FE	Federally Endangered	CE	California Endangered
FT	Federally Threatened	CT	California Threatened
FPT	Federally Proposed Threatened	CSC	California Species of Special Concern
FC	Federal Candidate	CRPR	California Rare Plant Ranking

FPD	Federally (Proposed) Delisted	CFP	California Fully Protected
		CCE	California Candidate Endangered

CRPR CODES

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

2.5 JURISDICTIONAL WATERS

Jurisdictional waters include rivers, creeks, and drainages that have a defined bed and bank and which, at the very least, carry ephemeral flows. Jurisdictional waters also include lakes, ponds, reservoirs, and wetlands. Such waters may be subject to the regulatory authority of the USACE, the CDFW, and the Regional Water Quality Control Board (RWQCB). See Section 3.8 of this report for additional information.

Jurisdictional waters are absent from the site.

2.6 CALIFORNIA SENSITIVE NATURAL COMMUNITIES

California Sensitive Natural Communities are natural communities designated by CDFW as those that are of limited distribution, distinguished by significant biological diversity, home to special status plant and animal species, of importance in maintaining water quality or sustaining flows, etc.

No habitats designated as a Sensitive Natural Community by CDFW or any other sensitive habitats are present on the site.

2.7 WILDLIFE MOVEMENT CORRIDORS

Wildlife movement corridors are routes that animals regularly and predictably follow during seasonal migration, dispersal from native ranges, daily travel within home ranges, and inter-population movements. Movement corridors in California are typically associated with valleys, rivers and creeks supporting riparian vegetation, and ridgelines.

Wildlife movement corridors are absent from the project site.

2.8 DESIGNATED CRITICAL HABITAT

The USFWS often designates areas of "critical habitat" when it lists species as threatened or endangered. Critical habitat is a specific geographic area(s) that contains features essential for the conservation of a threatened or endangered species and that may require special management and protection.

Designated critical habitat is absent from the project site and surrounding lands.

3.0 RELEVANT GOALS, POLICIES, AND LAWS

3.1 CEQA

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

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

- Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by CDFW or USFWS.

- Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by CDFW or USFWS.

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

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

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

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

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

- Substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or substantially reduce the number or restrict the range of an endangered, rare or threatened species.
- Achieve short-term environmental goals to the detriment of long-term environmental goals.
- Produce environmental effects that are individually limited but cumulatively considerable, meaning that the incremental effects of the project are significant when viewed in connection with the effects of past projects, other current projects, and probable future projects.

3.2 GENERAL PLAN POLICIES OF THE COUNTY OF MADERA

In compliance with CEQA, the lead agency must consider project conformance with applicable goals and policies of the General Plan of Madera County. The Madera County General Plan includes goals and policies designed to protect significant biotic resources of the Planning Area. Resource elements addressed by this plan include: (1) wetland and riparian areas, (2) fish and wildlife habitat, (3) vegetation, and (4) open space for the preservation of natural resources. Madera County General Plan policies related to natural resources can be found in Appendix D.

3.3 THREATENED AND ENDANGERED SPECIES

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

under FESA to include "harm" (16 USC, Section 1532(19), 50 CFR, Section 17.3). The USFWS commonly interprets "take" to include the loss of habitat utilized by a listed species.

When state and federally listed species have the potential to be impacted by a project, the USFWS and CDFW must be included in the CEQA process. These agencies review the environmental document to determine the adequacy of its treatment of endangered species issues and to make project-specific recommendations for the protection of listed species. Projects that may result in the "take" of listed species must generally enter into consultation with the USFWS and/or CDFW pursuant to FESA and CESA, respectively. In some cases, incidental take authorization(s) from these agencies may be required before the project can be implemented.

3.4 CALIFORNIA FULLY PROTECTED SPECIES

The classification of certain animal species as "fully protected" was the State of California's initial effort in the 1960s, prior to the passage of the California Endangered Species Act, to identify and provide additional protection to those species that were rare or faced possible extinction. Following CESA enactment in 1970, many fully protected species were also listed as California threatened or endangered. The list of fully protected species is identified, and their protections stipulated, in California Fish and Game Code Sections 3511 (birds), 4700 (mammals), 5050 (reptiles and amphibians), and fish (5515). Fully protected species may not be taken or possessed at any time and no licenses or permits may be issued for their take, except in conjunction with necessary scientific research and protection of livestock.

3.5 MIGRATORY BIRDS

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

Native birds are also protected under California state law. The California Fish and Game Code makes it unlawful to take or possess any non-game bird covered by the FMBTA (Section 3513), as well as any other native non-game bird (Section 3800), even if incidental to lawful activities.

3.6 BIRDS OF PREY

Birds of prey are protected in California under provisions of the Fish and Game Code (Section 3503.5), which states that it is unlawful to take, possess, or destroy any birds in the order Falconiformes (hawks and eagles) or Strigiformes (owls), as well as their nests and eggs. The bald eagle and golden eagle are afforded additional protection under the federal Bald and Golden Eagle Protection Act (16 USC 668), which makes it unlawful to kill birds or their eggs.

3.7 NESTING BIRDS

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

3.8 WETLANDS AND OTHER "JURISDICTIONAL WATERS"

Section 404 of the federal Clean Water Act (CWA) regulates the discharge of dredged or fill material into "navigable waters" (33 U.S.C. §1344), defined in the CWA as "the waters of the United States, including the territorial seas" (33 U.S.C. §1362(7)). The CWA does not supply a definition for waters of the U.S., and that has been the subject of considerable debate since the CWA's passage in 1972. A variety of regulatory definitions have been promulgated by the two federal agencies responsible for implementing the CWA, the Environmental Protection Agency (EPA) and USACE. These definitions have been interpreted, and in some cases, invalidated, by federal courts.

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

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

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

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

All activities that involve the discharge of dredge or fill material into waters of the U.S. are subject to the permit requirements of the USACE. Such permits are typically issued on the condition that the applicant agrees to provide mitigation that result in no net loss of wetland functions or values.

Under the Porter-Cologne Water Quality Control Act of 1969, the State Water Resources Control Board (SWRCB) has regulatory authority to protect the water quality of all surface water and groundwater in the State of California ("waters of the State"). Nine RWQCBs oversee water quality at the local and regional level. The RWQCB for a given region regulates discharges of fill or pollutants into waters of the State through the issuance of various permits and orders.

Discharges into waters of the State that are also waters of the U.S. require a Section 401 Water Quality Certification from the RWQCB as a prerequisite to obtaining a Section 404 Clean Water Act permit. Discharges into waters of the State that are not also waters of the U.S. require Waste Discharge Requirements (WDRs), or waivers of WDRs, from the RWQCB.

The SWRCB and RWQCBs also administer the federal National Pollution Discharge Elimination System (NPDES) program, which is concerned with the discharge of stormwater and other pollutants into water bodies. Projects that disturb one or more acres of soil must obtain coverage under the SWRCB's current NPDES Construction Stormwater General Permit. A prerequisite for permit coverage is the development of a Storm Water Pollution Prevention Plan (SWPPP) by a certified Qualified SWPPP Developer. Other types of pollutant discharges into waters of the U.S., such as wastewater, may require coverage under a different NPDES general permit, and in some cases an individual permit.

CDFW has jurisdiction over the bed and bank of natural drainages and lakes according to provisions of Section 1601 and 1602 of the California Fish and Game Code. Activities that may substantially modify such waters through the diversion or obstruction of their natural flow, change or use of any material from their bed or bank, or the deposition of debris require a Notification of Lake or Streambed Alteration. If CDFW determines that the activity may adversely affect fish and wildlife resources, a Lake or Streambed Alteration Agreement will be prepared. Such an agreement typically stipulates that certain measures will be implemented to protect the habitat values of the lake or drainage in question.

4.0 IMPACTS AND MITIGATIONS

The project considered in this evaluation of impacts to biological resources is the proposed commercial development of approximately 6 acres associated with Madera County APNs 027-092-024 & 027-201-022. This analysis assumes that all areas of the site will experience permanent impacts from proposed development.

4.1 POTENTIALLY SIGNIFICANT PROJECT IMPACTS

4.1.1 Potential Project Impacts to Nesting Birds

Potential Impacts. The project site has the potential to be used for nesting by a variety of birds protected by state and federal law, primarily in onsite trees. If construction or tree removal takes place during the nesting season, birds nesting on the site could be injured or killed by construction activities or disturbed such that they would abandon their nests. Significant construction-related disturbance is also a possibility for birds nesting adjacent to the project site. Construction-related mortality of nesting birds and disturbance leading to nest abandonment would violate state and federal laws and constitute significant impacts of the project.

Mitigation. To avoid and minimize the potential for construction-related mortality/disturbance of nesting birds the following measures will be implemented:

> ***Measure 4.1.1a (Construction Timing).*** If feasible, the project will be implemented outside of the avian nesting season, typically defined as February 1 to August 31.
>
> ***Measure 4.1.1b (Preconstruction Surveys*)**. If construction must occur between February 1 and August 31, a qualified biologist will conduct pre-construction surveys for active bird nests within 10 days prior to the start of construction. The survey area will encompass the site and surrounding lands within 250 feet for nesting migratory birds and 500 feet for raptors (i.e., birds of prey).
>
> ***Measure 4.1.1c (Avoidance of Active Nests*)**. Should any active nests be discovered in or near proposed construction zones, the biologist will identify a suitable construction-free buffer around the nest. This buffer will be identified on the ground with flagging or fencing and will be maintained until the biologist has determined that the young have fledged and are capable of foraging independently.

Implementation of the above measures will reduce potential project impacts to nesting birds to a less than significant level under CEQA and facilitate compliance with state and federal laws.

4.1.2 Potential Project Impacts to the Swainson's Hawk

Potential Impacts: The Swainson's hawk, a state-listed bird species, is known to occur in the project vicinity (eBird 2025, iNaturalist 2025), with a number of sightings at and near the Fairmead Landfill. Suitable nest trees occur on and near the project site. A survey of these trees found only one stick nest in a eucalyptus tree within the boundaries of the Fairmead Landfill approximately 350 feet southwest of the project site. The ruderal field occupying the site provides suitable foraging habitat for Swainson's hawks. The loss of these 6 acres of potential foraging habitat is not considered a significant loss of foraging habitat due to the abundance of similar or higher value foraging habitat available in the vicinity.

Should Swainson's hawks be nesting on or near the project site at the time of construction, individuals of this species could be injured or killed by construction activities or experience decreased reproductive success. These impacts, if they occur, would be considered significant under CEQA.

Mitigation. The following mitigation measures would reduce impacts to nesting Swainson's hawks to a less than significant level.

> ***Measure 4.1.2a (Construction Timing).*** To avoid impacts to nesting Swainson's hawks, construction activities will occur, where possible, outside the nesting season, typically defined as March 1-August 31.
>
> ***Measure 4.1.2b (Preconstruction Surveys).*** If project-related activities must occur between March 1 and August 31, a qualified biologist will conduct surveys prior to the start of construction for active Swainson's hawk nests within ½ mile of the site in accordance with the SHTAC (2000) guidelines. The guidelines define five survey periods for Swainson's hawk: Period I: January 1-March 20; Period II: March 20-April 5; Period III: April 5-April 20; Period IV: April 21-June 10; and Period V: June 10-July 30. The guidelines prescribe a minimum of three surveys per survey period for at least the two survey periods immediately prior to a project's initiation, and specifically recommend that surveys be completed in Periods II, III, and V.
>
> ***Measure 4.1.2c (Avoidance of Active Nests).*** Should any active Swainson's hawk nests be discovered within the survey area, an appropriate disturbance-free buffer will be established based on local conditions and agency guidelines. Disturbance-free buffers will be maintained until a qualified biologist has determined that the young have fledged and are capable of foraging independently.

Implementation of the above measures will reduce potential project impacts to nesting Swainson's hawks to a less than significant level under CEQA and facilitate compliance with state and federal laws.

4.2 LESS THAN SIGNIFICANT PROJECT IMPACTS

4.2.1 Potential Project Impacts to Special Status Plants

Potential Impacts. Nineteen (19) special status plant species have been documented in the project vicinity (see Table 1). While it is difficult to know if suitable habitat for special status plant species ever existed on the project site, decades of human use and disturbance on the site have created unsuitable habitat conditions for all 19 of these plant species.

Because these species have no appreciable potential to occur on the site, no project-related impacts are anticipated. Impacts to special status plants are considered less than significant under CEQA.

Mitigation. Mitigation measures are not warranted.

4.2.2 Potential Project Impacts to Special Status Animal Species Absent from or Unlikely to Occur Within the Project Site

Potential Impacts. Of the 16 special status animal species that potentially occur in the general vicinity of the site, 13 are considered absent from or unlikely to occur within the project site due to the absence of suitable habitat and/or the project site's being situated outside of the species' known distribution (see Table 1). These include the vernal pool fairy shrimp, vernal pool tadpole shrimp, valley elderberry longhorn beetle, Crotch's bumble bee, California tiger salamander, blunt-nosed leopard lizard, bald eagle, Fresno kangaroo rat, San Joaquin kit fox, western spadefoot, coast horned lizard, burrowing owl, and American badger (see Table 1). The project is expected to have an insignificant effect or no effect on these species through construction mortality/disturbance or loss of habitat because there is little or no likelihood that they are present.

Mitigation. Mitigation is not warranted.

4.2.3 Potential Project Impacts to Special Status Animal Species that May Occur on the Project Site as Occasional or Regular Foragers but Breed Elsewhere

Potential Impacts. Two special status animals, the northern harrier and tricolored blackbird, have the potential to forage on the site from time to time but would not breed on the site or near enough to the site that they could experience significant project-related disturbance at their nest sites (see Table 1). Foraging individuals of this species would not be vulnerable to construction-related injury or mortality because they are highly mobile and would be expected to simply avoid active work areas.

The project site does not offer any unique foraging habitat, with many square miles of similar to higher quality foraging habitat abundant in the region. Therefore, the project is not expected to adversely affect these species from loss of foraging habitat. Potential project impacts to the northern harrier and tricolored blackbird are considered less than significant.

Mitigation. Mitigation is not warranted.

4.2.4 Potential Project Impacts to Waters of the United States and California

Potential Impacts. As noted in Section 2.5 of this report, the project site contains no aquatic features. As a result, the project would have no impact on waters of the State or U.S.

4.2.5 Potential Project Impacts to Wildlife Movement Corridors

Potential Impacts. The project site does not contain or adjoin any geographic features that could function as a wildlife movement corridor. Therefore, the project will have no impact on wildlife movement corridors.

Mitigation. Mitigation is not warranted.

4.2.6 Project Impacts to Sensitive Natural Communities and Designated Critical Habitat

Potential Impacts. Sensitive Natural Communities and Designated Critical Habitat are absent from the project site and surrounding lands. Project development would have no impact on Sensitive Natural Communities or Designated Critical Habitat.

Mitigation. No mitigation is warranted.

4.2.7 Consistency with Local Policies and Habitat Conservation Plans

Potential Impacts. No Habitat Conservation Plans are in place in the project vicinity that would cover activities on the project site. The project area is outside sensitive biological resource areas identified in the Madera County General Plan. As such, the project appears to be in compliance with the General Plan policies pertaining to biological resources and is not subject to any local policies dealing with biological resource issues.

Mitigation. Mitigation is not warranted.

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APPENDIX A:
VASCULAR PLANTS OF THE PROJECT SITE

APPENDIX A: VASCULAR PLANTS OF THE PROJECT SITE

The plant species listed below have been observed within or adjacent to the project site during site surveys conducted by Live Oak Associates, Inc., on October 23, 2025. The wetland indicator status of each plant, derived from the USACE-administered National Wetland Plant List for the Arid West Region, has been shown following its common name if available.

OBL - Obligate
FACW - Facultative Wetland
FAC - Facultative
FACU - Facultative Upland
UPL - Upland
NR - No review
NA - No agreement
NI - No investigation

ARECACEAE—Palm Family		
Washingtonia robusta	Mexican Fan Palm	FACW
ASTERACEAE - Sunflower Family		
Centromadia pungens	Common Spikeweed	FAC
Grindelia camporum	Great Valley Gumweed	FACW
Holocarpha virgata	Narrow Tarplant	UPL
BRASSICACEAE - Mustard Family		
Hirschfeldia incana	Short-podded Mustard	UPL
EUPHORBIACEAE – Spurge Family		
Croton setigerus	Doveweed	UPL
GERANIACEAE - Geranium Family		
Erodium cicutarium	Red-stemmed Filaree	UPL
LAMIACEAE - Mint Family		
Trichostema lanceolatum	Vinegarweed	UPL
MALVACEAE – Mallow Family		
Malva parviflora	Cheeseweed	UPL
MORACEAE—Mulberry Family		
Morus alba	White Mulberry	FACU
MYRTACEAE—Myrtle Family		
Eucalyptus camaldulensis	River Redgum	FAC
POACEAE - Grass Family		
Avena sp.	Wild Oat	UPL
Bromus diandrus	Ripgut	UPL
Bromus hordeaceous	Soft Chess	FACU
Festuca myuros	Rat-tail Fescue	FACU
Hordeum murinum ssp. *leporinum*	Barley	FACU
ROSACEAE—Rose Family		
Prunus sp.		UPL
SIMAROUBACEAE - Quassia Family		
Ailanthus altissima	Tree Of Heaven	FACU
SOLANACEAE – Nightshade Family		
Datura wrightii	Jimsonweed	UPL
ZYGOPHYLLACEAE—Creosota-bush Family		
Tribulus terrestris	Puncturevine	UPL

APPENDIX B: TERRESTRIAL VERTEBRATE SPECIES POTENTIALLY OCCURRING ON THE PROJECT SITE

APPENDIX B
TERRESTRIAL VERTEBRATE SPECIES POTENTIALLY OCCURRING ON THE PROJECT SITE

The species listed below are those that may reasonably be expected to use the habitats of the project site. The list was not intended to include birds that are vagrants or occasional transients. Its purpose was rather to include those species that may be expected to routinely and predictably use the project site during some or all of the year. An asterisk denotes a species observed within or adjacent to the site during surveys conducted on October 23, 2025.

CLASS: REPTILIA
ORDER: SQUAMATA (Lizards and Snakes)
SUBORDER: IGUANIA (Lizards)
FAMILY: PHRYNOSOMATIDAE
*Western Fence Lizard (*Sceloporus occidentalis*)
Common Side-blotched Lizard (*Uta stansburiana*)
SUBORDER: SERPENTES (Snakes)
Gopher Snake (*Pituophis melanoleucus*)
Common Kingsnake (*Lampropeltis getulus*)
FAMILY: VIPERIDAE
Northern Pacific Rattlesnake (*Crotalus oreganus oreganus*)

CLASS: AVES
ORDER: FALCONIFORMES (Vultures, Hawks, and Falcons)
FAMILY: CATHARTIDAE (American Vultures)
Turkey Vulture (*Cathartes aura*)
FAMILY: ACCIPITRIDAE (Hawks, Old World Vultures, and Harriers)
*Red-tailed Hawk (*Buteo jamaicensis*)
Swainson's Hawk (*Buteo swainsoni*)
Northern Harrier (*Circus hudsonius*)
FAMILY: FALCONIDAE (Caracaras and Falcons)
American Kestrel (*Falco sparverius*)
ORDER: COLUMBIFORMES (Pigeons and Doves)
FAMILY: COLUMBIDAE (Pigeons and Doves)
*Rock Pigeon (*Columba livia*)
Eurasian Collared-Dove (*Streptopelia decaocto*)
*Mourning Dove (*Zenaida macroura*)
ORDER: APODIFORMES (Swifts and Hummingbirds)
FAMILY: TROCHILIDAE (Hummingbirds)
Anna's Hummingbird (*Calypte anna*)
Rufous Hummingbird (*Selasphorus rufus*)
ORDER: PICIFORMES (Woodpeckers and relatives)
FAMILY: PICIDAE (Woodpecker and Wrynecks)
Northern Flicker (*Colaptes chrysoides*)
Nuttall's Woodpecker (*Picoides nuttallii*)

ORDER: PASSERIFORMES (Perching Birds)
FAMILY: TYRANNIDAE (Tyrant Flycatchers)
*Black Phoebe (*Sayornis nigricans*)
Say's Phoebe (*Sayornis saya*)
Western Kingbird (*Tyrannus verticalis*)
FAMILY: HIRUNDINIDAE (Swallows)
Cliff Swallow (*Hirundo pyrrhonota*)
FAMILY: CORVIDAE (Jays, Magpies, and Crows)
*California Scrub Jay (*Aphelocoma calfornica*)
American Crow (*Corvus brachyrhynchos*)
Common Raven (*Corvus corax*)
FAMILY: ALAUDIDAE (Larks)
Horned Lark (*Eremophila alpestris*)
FAMILY: TURDIDAE (Thrushes)
American Robin (*Turdus migratorius*)
FAMILY: MIMIDAE (Mockingbirds and Thrashers)
Northern Mockingbird (*Mimus polyglottos*)
FAMILY: STURNIDAE (Starlings)
*European Starling (*Sturnus vulgaris*)
FAMILY: MOTACILLIDAE (Wagtails and Pipits)
American Pipit (*Anthus rubescens*)
FAMILY: PARULIDAE (Wood Warblers and Relatives)
*Yellow-rumped Warbler (*Dendroica coronata*)
FAMILY: EMBERIZIDAE (Emberizines)
*Savannah Sparrow (*Passerculus sandwichensis*)
FAMILY: ICTERIDAE (Blackbirds, Orioles and Allies)
Red-Winged Blackbird (*Agelaius phoeniceus*)
Western Meadowlark (*Sturnella neglecta*)
Brewer's Blackbird (*Euphagus cyanocephalus*)
Brown-headed Cowbird (*Molothrus ater*)
FAMILY: FRINGILLIDAE (Finches)
*House Finch (*Carpodacus mexicanus*)
*Lesser Goldfinch (*Carduelis psaltria*)
FAMILY: PASSERIDAE (Old World Sparrows)
House Sparrow (*Passer domesticus*)

CLASS: MAMMALIA (Mammals)
FAMILY: TALPIDAE (Moles)
Broad-Footed Mole (*Scapanus latimanus*)
ORDER: CHIROPTERA (Bats)
FAMILY: PHYLLOSTOMIDAE (Leaf-nosed Bats)
Southern Long-nosed Bat (*Leptonycteris curasoae*)
FAMILY: VESPERTILIONIDAE (Evening Bats)
Yuma Myotis (*Myotis yumanensis*)
California Myotis (*Myotis californicus*)
Western Pipistrelle (*Pipistrellus hesperus*)

Big Brown Bat (*Eptesicus fuscus*)

FAMILY: MOLOSSIDAE (Free-tailed Bat)

Brazilian Free-Tailed Bat (*Tadarida brasiliensis*)

ORDER: LAGOMORPHA (Rabbits, Hares, and Pikas)

FAMILY: LEPORIDAE (Rabbits and Hares)

Audubon Cottontail Rabbit (*Sylvilagus audubonii*)

ORDER: RODENTIA (Rodents)

FAMILY: SCIURIDAE (Squirrels, Chipmunks, and Marmots)

*California Ground Squirrel (*Otospermophilus beecheyi*)

FAMILY: GEOMYIDAE (Pocket Gophers)

*Botta's Pocket Gopher (*Thomomys bottae*)

FAMILY: MURIDAE (Old World Rats and Mice)

Western Harvest Mouse (*Reithrodontomys megalotis*)

Deer Mouse (*Peromyscus maniculatus*)

California Vole (*Microtus californicus*)

ORDER: CARNIVORA (Carnivores)

FAMILY: CANIDAE (Foxes, Wolves, and relatives)

Coyote (*Canis latrans*)

Red Fox (*Vulpes vulpes*)

FAMILY: PROCYONIDAE (Raccoons and relatives)

Raccoon (*Procyon lotor*)

FAMILY: MEPHITIDAE (Skunks)

Striped Skunk (*Mephitis mephitis*)

APPENDIX C:
SELECT PHOTOGRAPHS OF THE PROJECT SITE



Photo 1: Southwest portion of site once occupied by several buildings.



Photo 2: Another view of southwest portion of site.



Photo 3: Southeast portion of site. Adjacent frontage road and SR 99 in upper right.



Photo 4: Northern portion of site. SR 99 in upper right and adjacent almond orchard in background.