California Environmental Quality Act

Initial Study

(State Clearinghouse No. 2020049007)

New Southeast Elementary School Project

Fresno, California

Lead Agency and Project Sponsor:

Sanger Unified School District

OCTOBER 2022

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Executive Summary

Sanger Unified School District ("District") is proposing to develop the New Southeast Fresno Elementary School Project ("project") to serve student enrollment growth generated by new urban development within southeast Fresno. The project site encompasses 17.79 acres located on the west side of Temperance Avenue approximately 700 feet north of Church Avenue in an unincorporated portion of Fresno County, California (APNs 316-160-46 and 316-160-72). The site is immediately adjacent to the City of Fresno's city limits and is within the Fresno Sphere of Influence. The location of the project site is displayed on Figures 1 and 2.

The project will be developed in phases, beginning with limited facilities that will house up to 50 elementary school students in two portable classrooms adjacent to a permanent structure that will house a school office and restroom. Playfields and athletic facilities will also be constructed with this phase (Figure 3). In its initial form, the school will act as a satellite campus to another elementary school in the vicinity. Construction of the first phase is anticipated to be completed for the 2024-25 school year.

At full buildout, the elementary school will be designed to provide capacity for approximately 700 students in transitional kindergarten through sixth grades. This campus will have approximately 45 employees (including administrators, faculty, and support staff). Facilities planned as part of the project include administrative offices, classrooms, a multi-purpose building, athletic fields (which may be lighted), physical education facilities, and parking areas (Figure 4). Instructional activities at the elementary school will be in regular session on weekdays from late August to early June, with additional special events and classes during evenings, on weekends, and during the summer recess. The timing for full buildout of the school will be dependent upon enrollment growth and funding availability.

The project includes the annexation of the site to the City of Fresno. It is anticipated that the project will be served by the City of Fresno's water and sewer systems.

Based on the California Environmental Quality Act Guidelines (CEQA Guidelines), the purpose of this Initial Study is to provide the District with environmental information on the project to use as the basis for deciding whether to prepare an Environmental Impact Report or a Negative Declaration for the project.

The conclusions of the Initial Study are as follows:

1. The Initial Study identified a number of potentially significant environmental effects of the project in the following subject areas: air quality, biological resources, cultural resources, geology and soils, noise, transportation, and tribal cultural resources. The District can either avoid these impacts or reduce them to a level that is less than significant by incorporating in the project the mitigation measures listed in Summary Table of Mitigation Measures on the following pages.
2. The project would have a less than significant impact or no impact on many of the environmental resources and conditions evaluated in the Initial Study. The Initial Study explains why there would be no impacts or the impacts would be less than significant.
3. Based on items 1 and 2, above, the District should adopt a Mitigated Negative Declaration for the project.

SUMMARY OF POTENTIALLY SIGNIFICANT IMPACTS AND MITIGATION MEASURES

Impact	Mitigation Measures	Timing and Responsibility	Level of Significance with Mitigation
Air Quality			
Impact: Project construction could expose sensitive receptors to substantial pollutant concentrations.	***MMs AQ-1 through AQ-9: Measures to Reduce Localized Pollutant Concentrations Upon Sensitive Receptors*** **AQ-1**. On-road diesel vehicles shall comply with Section 2485 of Title 13 of the California Code of Regulations. This regulation limits idling from diesel-fueled commercial motor vehicles with gross vehicular weight ratings of more than 10,000 pounds and licensed for operation on highways. It applies to California and non-California based vehicles. In general, the regulation specifies that drivers of said vehicles: a. Shall not idle the vehicle's primary diesel engine for greater than 5 minutes at any location, except as noted in Subsection (d) of the regulation; and, b. Shall not operate a diesel-fueled auxiliary power system to power a heater, air conditioner, or any ancillary equipment on that vehicle during sleeping or resting in a sleeper berth for greater than 5.0 minutes at any location when within 1,000 feet of a restricted area, except as noted in Subsection (d) of the regulation. **AQ-2**. Heavy-duty, off-road diesel-fueled equipment (50 horsepower, or greater) shall comply with the 5-minute idling restriction identified in Section 2449(d)(2) of the California Air Resources Board's In-Use Off-Road Diesel regulation. **AQ-3**. Heavy-duty, off-road diesel-fueled equipment (50 horsepower, or greater) shall be fitted with diesel particulate filters, per manufacturer's recommendations, or shall meet at minimum Tier 3 emissions standards. To the extent locally available, tier 4 should be used.	During construction of the project (Sanger Unified)	Less Than Significant

SUMMARY OF POTENTIALLY SIGNIFICANT IMPACTS AND MITIGATION MEASURES

	AQ-4. Signs shall be posted at the project site construction entrance to remind drivers and operators of the state's five-minute idling limit. **AQ-5**. To the extent available, fossil-fueled equipment shall be replaced with alternatively-fueled (e.g., natural gas) or electrically-driven equivalents. **AQ-6**. Construction truck trips shall be scheduled, to the extent possible, to occur during non-peak hours. **AQ-7**. The burning of vegetative material shall be prohibited. **AQ-8**. The proposed project shall comply with SJVAPCD Regulation VIII for the control of fugitive dust emissions. Regulation VIII can be obtained on the SJVAPCD's website: https://www.valleyair.org/rules/1ruleslist.htm. At a minimum, the following measures shall be implemented: a. All disturbed areas, including storage piles, which are not being actively utilized for construction purposes, shall be effectively stabilized of dust emissions using water, chemical stabilizer/suppressant, covered with a tarp or other suitable cover or vegetative ground cover. b. All on-site unpaved roads and off-site unpaved access roads shall be effectively stabilized of dust emissions using water or chemical stabilizer/suppressant. c. All land clearing, grubbing, scraping, excavation, land leveling, grading, and cut & fill activities shall be effectively controlled of fugitive dust emissions utilizing application of water or by presoaking. d. When materials are transported off-site, all material shall be covered, or effectively wetted to limit visible dust emissions, and at least six inches of freeboard space from the top of the container shall be maintained. e. Trackout shall be immediately removed when it extends 50 or more feet from the site and at the end of each workday. (The use		

SUMMARY OF POTENTIALLY SIGNIFICANT IMPACTS AND MITIGATION MEASURES

	of dry rotary brushes is expressly prohibited except where preceded or accompanied by sufficient wetting to limit the visible dust emissions. Use of blower devices is expressly forbidden.) f. Following the addition of materials to, or the removal of materials from, the surface of outdoor storage piles, said piles shall be effectively stabilized of fugitive dust emissions utilizing sufficient water or chemical stabilizer/suppressant. g. On-road vehicle speeds on unpaved surfaces of the project site shall be limited to 15 mph. h. Sandbags or other erosion control measures shall be installed sufficient to prevent silt runoff to public roadways from sites with a slope greater than one percent. i. Excavation and grading activities shall be suspended when winds exceed sustained speeds of 20 miles per hour (Regardless of wind speed, an owner/operator must comply with Regulation VIII's 20 percent opacity limitation). **AQ-9**. The above measures for the control of construction-generated emissions shall be made available to project contractors and included on site grading and construction plans.		
Biological Resources			
Impact: Project construction could adversely affect special status bats, special status birds and migratory birds protected by the Migratory Bird Treaty Act.	***MMs BR-1 and BR-2: Mitigation for Potential Impacts to Special Status Bats*** **BR-1: Pre-construction Surveys:** Prior to the onset of construction activity, a California Department of Fish and Wildlife (CDFW)- approved biologist will conduct pre-construction surveys for active roosting, breeding, or hibernacula sites (roosts) in large trees and buildings within the project area. Construction/building demolition will not take place as long as a roost site is occupied. Therefore, depending on when construction begins, bat surveys should be timed to be prior to the change in season (maternity vs. hibernation) so that special status bats can be correctly excluded	Prior to construction of the project (Sanger Unified)	Less Than Significant

SUMMARY OF POTENTIALLY SIGNIFICANT IMPACTS AND MITIGATION MEASURES

	without take (see seasons below). If no active bat roosts, breeding, or hibernacula sites are detected, no further action is required. **BR-2: Avoidance and Minimization:** a. If any active bat sites are discovered or if evidence of recent occupation is established, the following measures will be implemented in order to minimize impacts on special status bats: 1. Construction will be scheduled to minimize impacts upon pallid bats. Type and status of active roosts shall be determined, and bat eviction shall be undertaken in a manner that does not exclude bats during times of inclement weather or exclude females from young still in a roost. 2. Hibernation sites with evidence of prior occupation will be sealed before the hibernation season (November–March), and nursery sites will be sealed before the nursery season (April– August). 3. If the site is occupied by the bats, then construction will occur outside the hibernation season (for hibernacula), and after August 15 (for nursery colonies). Construction/building demolition will not take place as long as the roost site is occupied. 4. If exclusion devices are used, they will be employed based on current best practices and will be regularly monitored by a qualified biologist. ***MM BR-3 through BR-6: Mitigation for Potential Impacts to Special Status and Nesting Migratory Birds*** **BR-3: Avoidance:** If feasible, any vegetation removal will take place between September 1 and February 1 to avoid impacts to nesting birds in compliance with the Migratory Bird Treaty Act. If vegetation removal must occur during the nesting season, project construction may be delayed due to actively nesting birds and their required protective buffers. **BR-4: Pre-construction Surveys:**		

SUMMARY OF POTENTIALLY SIGNIFICANT IMPACTS AND MITIGATION MEASURES

	a. If vegetation removal or ground disturbance will commence between February 1 and August 31, a qualified biologist will conduct a pre-construction survey for nesting birds within 10 days of the initiation of disturbance activities. This survey will cover: 1. Potential nest sites in trees, bushes, or grass within species-specific buffers of the project area (Swainson's hawk – 0.5-mile, other raptor species – 500 ft, non-raptor species – 250 ft. 2. Survey protocol developed by the Swainson's Hawk Technical Advisory Committee (TAC) should be followed (CDFG 2000), which includes survey timing and requirements for repeated visits. b. Surveys for burrowing owl will occur within 14 days prior to any ground disturbance, no matter the season. This survey will cover potential burrowing owl burrows in the project area and suitable habitat within 150 m (500 ft). Evaluation of use by owls shall be in accordance with California Department of Fish and Wildlife survey guidelines (CBOC 1993, CDFG 1995, CDFG 2012). Surveys will document if burrowing owls are nesting or using habitat in or directly adjacent to the project area. Survey results will be valid only for the season (breeding (Feb 1-Aug 31) or non-breeding (Sept 1-Jan 31) during which the survey is conducted. c. If no active nests or burrows are detected during the pre-construction survey, then no further action is required. If an active nest or burrow is detected, then the following minimization measures will be implemented. **BR-5: Minimization/Establish Buffers:** a. Special status bird species (other than burrowing owl) and MBTA-protected species: If any active nests are discovered (and if construction will occur during bird breeding season), the U.S. Fish and Wildlife Service (USFWS) and/or CDFW will be contacted to determine protective measures required to avoid take. These measures could include fencing off an area where a nest occurs, or shifting construction		

SUMMARY OF POTENTIALLY SIGNIFICANT IMPACTS AND MITIGATION MEASURES

	work temporally or spatially away from the nesting birds. Biologists are required on site to monitor construction while protected migratory birds are nesting in the project area. If an active nest is found after the completion of the pre-construction surveys and after construction begins, all construction activities will stop until a qualified biologist has evaluated the nest and erected the appropriate buffer around the nest. b. Burrowing Owl: If burrowing owls are detected within the survey area, CDFW should be consulted to determine the suitable buffer. These buffers will consider the level of disturbance of the project activity, existing disturbance of the site (vehicle traffic, humans, pets, etc.), and time of year (nesting vs. wintering). If avoidance is not feasible, the City will work with CDFW to determine appropriate mitigation, such as passive exclusion or translocation, and associated mitigation land offset (CDFG 2012). **BR-6:** If avoidance is not possible, a qualified biologist will develop appropriate mitigation that will reduce project impacts to sensitive biological resources to a less than significant level. The type and amount of mitigation will depend on the resources impacted, the extent of the impacts, and the quality of habitats to be impacted. Mitigation may include but are not limited to: 1) Compensation for lost habitat in the form of preservation or creation of in-kind habitat protected by conservation easement; 2) Purchase of appropriate credits from an approved mitigation bank or land trust servicing the Fresno County Area; 3) Payment of in-lieu fees.		

Cultural Resources			
Impact: Ground-disturbing construction activities could adversely affect cultural resources.	***MMs CR-1 and CR-2: Mitigation for Potential Discovery of Cultural Resources*** **CR-1:** Prior to the start of ground disturbing activities, a field survey of the project site shall be conducted by a qualified cultural resources specialist to ascertain whether there are cultural resources on the surface of the project site. If surface resources are encountered and determined by the cultural resources specialist to be potentially significant, the specialist shall make recommendations to the District on mitigation measures to be implemented to protect the discovered resources in accordance with CEQA Guidelines §15064.5 and Public Resources Code §21083.2. **CR-2:** If cultural resources are encountered during ground disturbing construction activities, work shall stop in the immediate vicinity of the find and a qualified cultural resources specialist shall be consulted to determine the significance of the resources in accordance with CEQA Guidelines §15064.5. If potentially significant, the specialist shall make recommendations to the District on mitigation measures to be implemented to protect the discovered resources in accordance with CEQA Guidelines §15064.5 and Public Resources Code §21083.2. If cultural remains are encountered during ground disturbing activities, work shall stop in the immediate vicinity of the find and the County Coroner notified in accordance with Health and Safety Code §7050.5 and CEQA Guidelines §15064.5(e). If the remains are determined to be of Native American descent, the procedures and requirements set forth in CEQA Guidelines §15064.5(d) and (e) and Public Resources Code §5097.98 shall be implemented.	CR-1: Prior to construction of the project (Sanger Unified) CR-2: During construction of the project (Sanger Unified)	Less Than Significant
Geology and Soils			
Impact: The project could potentially disturb or destroy subsurface paleontological resources.	***MM GEO-1: Mitigation for Potential Discovery of Subsurface Paleontological Resources*** **GEO-1:** In the event that unique paleontological resources are discovered during excavation and/or construction activities, construction shall stop in the immediate vicinity of the find and a qualified paleontologist shall	During construction of the project (Sanger Unified)	Less Than Significant

	be consulted to determine whether the resource requires further study. The qualified paleontologist shall make recommendations to the District on the measures that shall be implemented to protect the discovered resources, including but not limited to, excavation of the finds and evaluation of the finds. If the resources are determined to be significant, mitigation measures shall be identified by the monitor and recommended to the Lead Agency. No further grading shall occur in the area of the discovery until the Lead Agency approves the measures to protect these resources. Any paleontological resources recovered as a result of mitigation shall be provided to an appropriate institution or person who is capable of providing long-term preservation to allow future scientific study.		
Noise			
Impact: The project may result in a substantial temporary or permanent increase in ambient noise levels in its vicinity that exceed standards established in the local general plan or noise ordinance, or applicable standards of other agencies.	***MM N-1: Construction Noise Mitigation*** **N-1:** The following measures shall be implemented to reduce construction-generated noise levels: a. Noise-generating construction activities, including equipment maintenance, shall be limited to the hours between 7:00 a.m. and 9:00 p.m. Noise-generating construction activities shall be prohibited on weekends and national holidays. b. Stationary construction equipment that generates noise that exceeds 65 dBA at the project boundaries shall be shielded with a barrier that meets a sound transmission class rating of 25. c. All diesel equipment shall be operated with closed engine doors and shall be equipped with factory-recommended mufflers. d. Whenever feasible, electrical power shall be used to run air compressors and similar power tools. e. Construction staging areas shall be located at the furthest distance possible from nearby residential land uses. ***MM N-2: Operational Noise Mitigation*** **N-2:** The following measures shall be implemented to reduce long-term operational noise impacts:	N-1: During construction of the project (Sanger Unified) N-2: During operation of the project (Sanger Unified)	Less Than Significant

	a. Exterior air conditioning units for buildings to be located within 100 feet of residential property lines shall be located on roof-top areas and/or shielded from direct line-of-sight of adjacent residences. b. A noise barrier shall be constructed along the southern property line of the nearest residential land uses located to the north of the proposed ball courts. The sound barrier shall be constructed to a minimum height of 5 feet above ground level with no visible air gaps between construction components or at the base of the structure. The barrier shall be constructed of wood, metal, or concrete block having a minimum total density of 4 pounds/square foot. (The noise barrier location is depicted on page 46 of this Initial Study.)		
Transportation			
Impact: Operation of the project could conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, considering all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit.	***Measure T-1 (Advisory: Not required under CEQA): Roadway System and Vehicular Travel Improvements*** **T-1:** a. The District will participate in the improvements recommended in the Traffic Impact Analysis (refer to Appendix 7 of the Initial Study) in accordance with the fair share percentages presented in Table 17-1 of the Initial Study. b. It is recommended that the City consider left-turn and right-turn lane storage lengths as indicated in the Queuing Analysis. ***MM T-2: Bicycle and Pedestrian Safety Measures*** **T-2:** a. The project shall implement pedestrian sidewalks consistent with the City of Fresno Active Transportation Plan within and adjacent to the project site. b. The project shall implement pedestrian sidewalks along future portions of Truman Avenue. c. The project shall implement Class I and Class II Bikeways along its frontage to Temperance Avenue consistent with the City of Fresno Active Transportation Plan.	T-1: During construction of the project (Sanger Unified, City of Fresno) T-2: During construction of the project (Sanger Unified, City of Fresno)	Less Than Significant

	d. Sanger Unified shall work with the City of Fresno to implement a Safe Routes to Schools plan and seek grant funding to help build walkways and bikeways where they are lacking within a one-mile radius of the proposed project site. e. The project shall prepare a school signage and striping plan in the vicinity of the project pursuant to the CA MUTCD Part 3 - Markings and Part 7 - Traffic Control for School Areas, that these be reviewed and approved by the City of Fresno, and subsequently implemented prior to opening day of the school component of the project.		
Tribal Cultural Resources			
Impact: Project activities could adversely affect unanticipated subsurface resources.	***MM TC-1: Mitigation for Unanticipated Discoveries*** **TC-1:** If tribal cultural resources are discovered during excavation and/or construction activities, construction shall stop in the immediate vicinity of the find and a qualified professional with expertise in tribal cultural resources shall be consulted to recommend an appropriate course of action with the input of potentially affected tribes. If it is determined that the project may cause a substantial adverse change to a tribal cultural resource, mitigation measures to be considered should include those identified in Public Resources Code Section 21084.3.	During construction of the project (Sanger Unified)	Less Than Significant

A. Project Background Information

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

Project Title:	New Southeast Fresno Elementary School Project
Lead Agency and Project Sponsor's Name and Address:	Sanger Unified School District 1905 Seventh Street Sanger, CA 93657
Contact Information:	Ryan Kilby Chief Operations Officer Telephone: (559) 524-6521 Email: ryan_kilby@sangerusd.net

2. Project Location

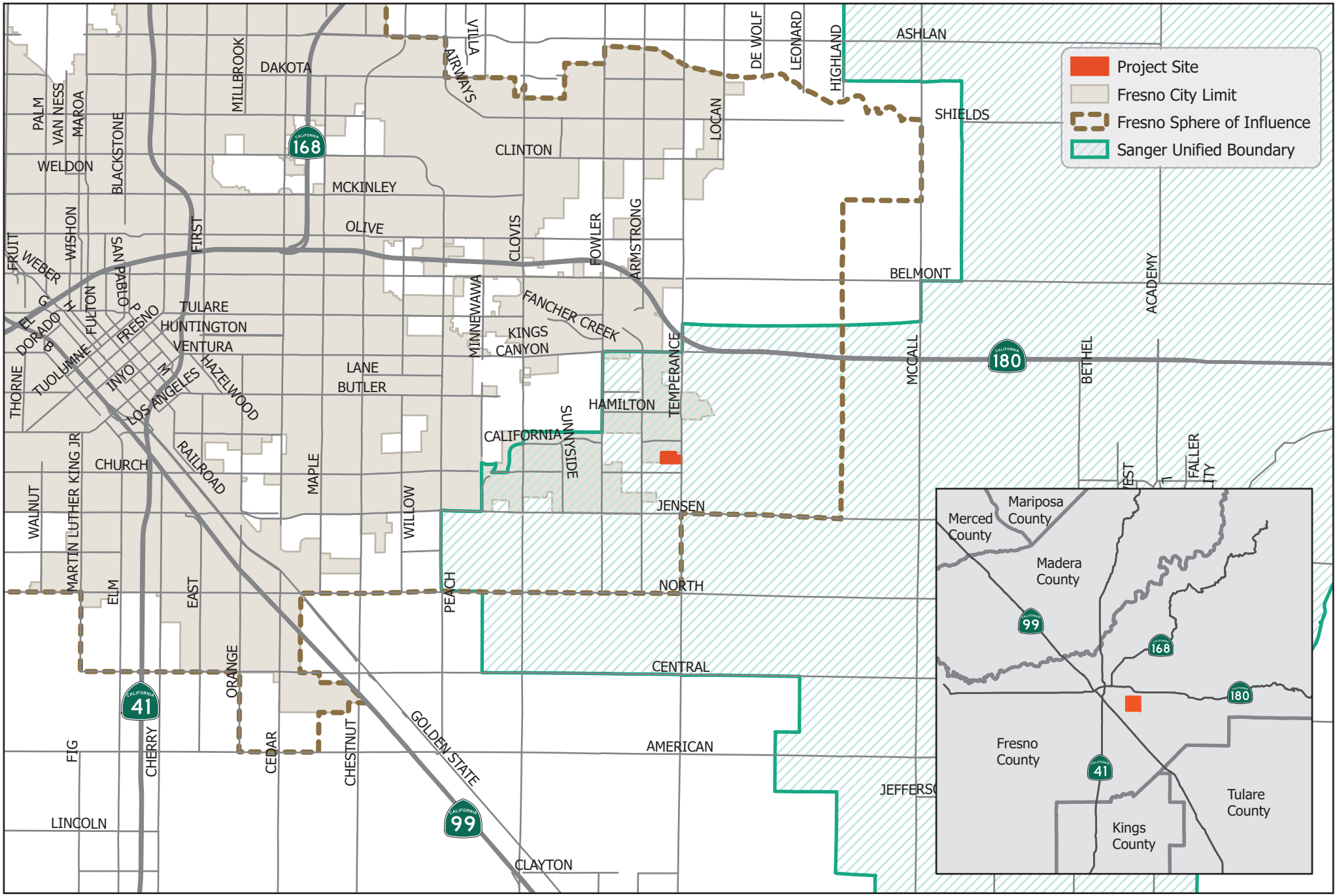
The 17.79-acre project site for the proposed New Southeast Fresno Elementary School is located on the west side of Temperance Avenue approximately 700 feet north of Church Avenue in an unincorporated portion of Fresno County, California (APNs 316-160-46 and 316-160-72). The site is immediately adjacent to the City of Fresno's city limits and is within the Fresno Sphere of Influence. Table A-1 presents additional project location information.

Figures 1 through 4 are presented on the following pages. The location of the project site is displayed on Figures 1 and 2. Figures 3 and 4 display the site plans for the proposed initial limited phase of the project and the proposed full buildout of the project, respectively.

TABLE A-1

Project Location

City or CDP, County, and Zip Code	Fresno County, 93727
Assessor's Parcel Number(s)	316-160-46 and 316-160-72
Situs	1345 S. Temperance Ave, Fresno
Nearest Existing Major Cross Streets	S. Temperance Ave and E. Church Ave
Elevation	Approximately 323 ft. MSL
USGS Map	Malaga Quadrangle
Section, Township & Range	Section 15, Township 14S, Range 21E, MDB&M
Latitude/Longitude	36° 43' 3"N, -119° 39' 59"W



Project Location **Figure 1**

New Southeast Fresno Elementary School Project
Sanger Unified School District

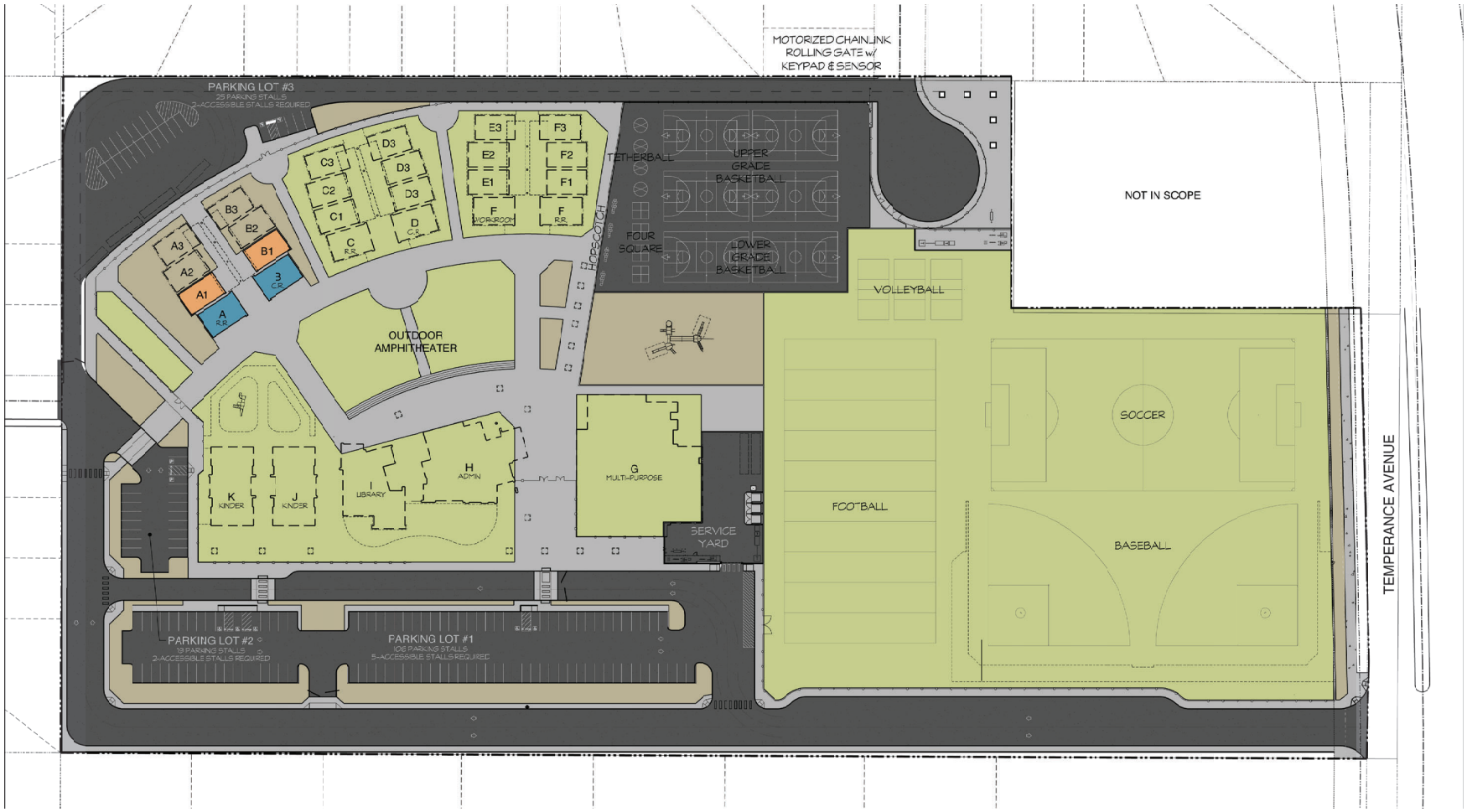
ODELL *Planning & Research, Inc.*
Environmental Planning • School Facility Planning • Demographics

Project Site **Figure 2**

New Southeast Fresno Elementary School Project
Sanger Unified School District

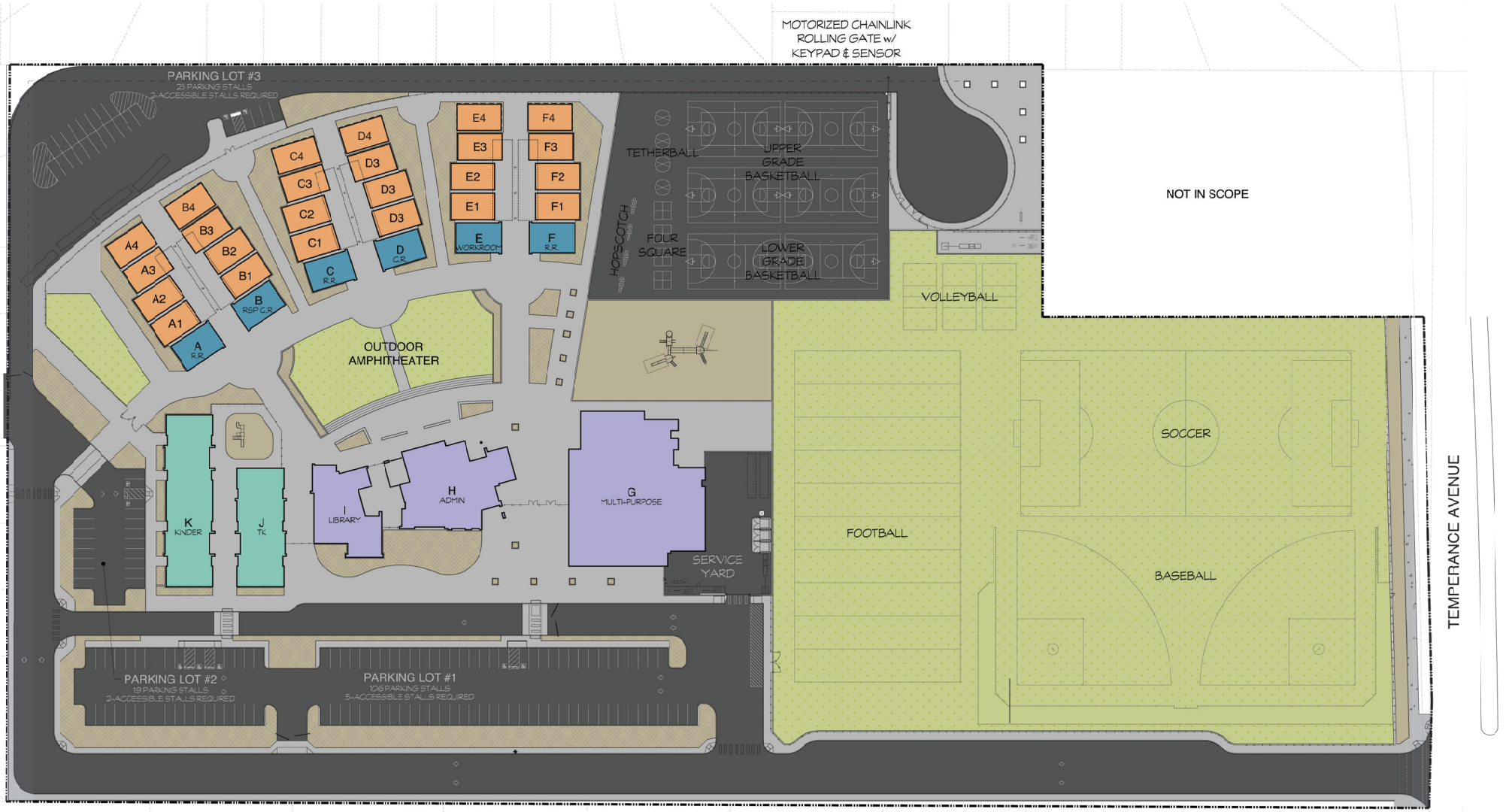
ODELL *Planning & Research, Inc.*
Environmental Planning • School Facility Planning • Demographics

Figure 3: Site Plan (Initial Limited Phase)



SITE PLAN - PHASE 1

Figure 4: Site Plan (Full Buildout)



SITE PLAN - FULL DEVELOPMENT

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Sanger Unified School District | Temperance Elementary | 10/06/2022

3. Project Description

The District is proposing to develop the New Southeast Fresno Elementary School Project to serve the growing student population resulting from new urban development occurring in southeast Fresno within the District's boundaries. The project will be developed in phases, beginning with limited facilities that will house up to 50 elementary school students in two portable classrooms adjacent to a permanent structure that will house a school office and restroom. Playfields and athletic facilities will also be constructed with this phase (Figure 3). In its initial form, the school will act as a satellite campus to another elementary school in the vicinity. At full buildout, the elementary school will be designed to provide capacity for approximately 700 students in transitional kindergarten through sixth grades. This campus will have approximately 45 employees (including administrators, faculty, and support staff). Facilities planned as part of the project include administrative offices, classrooms, a multi-purpose building, athletic fields (which may be lighted), physical education facilities, and parking areas (Figure 4). Instructional activities at the elementary school will be in regular session on weekdays from late August to early June, with additional special events and classes during evenings, on weekends, and during the summer recess.

The project includes the annexation of the site to the City of Fresno. It is anticipated that the project will be served by the City of Fresno's water and sewer systems.

4. Actions Required to Implement Project

Sanger Unified School District must undertake the following actions in order to implement the project:

- Complete the California Environmental Quality Act process for the project. This would involve either the adoption of a mitigated negative declaration for the project or the preparation of an environmental impact report. Based on the results of this Initial Study, the District should adopt a mitigated negative declaration for the project;
- Adopt and implement the Mitigation Monitoring and Reporting Program identified in Part F of this Initial Study;
- Approve the project;
- Complete the California Department of Education school site approval process;
- Secure approvals, permits, and agreements, as necessary, from agencies and utilities that are responsible for public facilities the project would construct, modify, or otherwise affect within or near the site.

5. Project Schedule

Construction of the first phase is anticipated to be completed in for the 2024-25 school year. The timing for full buildout of the school will be dependent upon enrollment growth and funding availability.

6. Project Setting

The proposed elementary school campus site is located in an unincorporated area of Fresno County within the City of Fresno Sphere of Influence and immediately adjacent to the City of Fresno city limits. It is anticipated that the project site will be annexed to the City of Fresno prior to construction. The site consists of two parcels – APN 316-160-72 (12.84 acres) and APN 316-160-46 (4.95 acres) – with a total size of approximately 17.79 acres.

a. Existing Land Uses

The proposed project site's northern parcel is a vacant lot, and the southern parcel is under agricultural production with one house and two outbuildings. Surrounding existing land uses include urban single-family residential development to the north and west, rural residential development to the south, and agricultural areas to the east and southwest.

b. Public Land Use Policy

The City of Fresno General Plan designates the proposed project site as "Residential – Medium Low Density" (appx 8.65 acres) and "Residential – Medium Density" (appx. 9.14 acres). Surrounding City of Fresno land use designations include "Residential – Medium Low Density", "Residential – Medium Density", and "Employment – Regional Business Park". The City of Fresno General Plan discusses these designations as follows:

- Residential land uses provide for a wide range of neighborhoods and housing types.
    - Medium Low Density designation is intended to provide for single family detached housing with densities of 3.5 to 6 units per acre.
    - Medium Density residential covers developments of 5 to 12 units per acre and is intended for areas with predominantly single-family residential development, but can accommodate a mix of housing types, including small-lot starter homes, zero-lot-line developments, duplexes, and townhouses.
- The Employment – Regional Business Park designation is intended for large or campus-like office and technology development that includes office, research and development, manufacturing and other large-scale, professional uses, with limited and properly screened outdoor storage. Permitted uses include incubator-research facilities, prototype manufacturing, testing, repairing, packaging, and printing, as well as offices and research facilities. Small-scale retail and service uses serving local employees and visitors are permitted as secondary uses. The maximum FAR is 1.0.

It is noted that the land to the east of the project site across Temperance Avenue is located within the City of Fresno's Southeast Development Area ("SEDA"). The SEDA Plan Area (which measures nearly 9,000 acres) is bounded on the north by the Gould Canal, on the east by McCall and Highland Avenues, on the south by Jensen and North Avenues, and on the west by Locan, Temperance, and Minnewawa Avenues. SEDA plays a significant role in the City of Fresno's plans for accommodating anticipated growth and development in the City. The SEDA Specific Plan includes policies and land used designations intended to address wide-ranging infrastructure, housing, employment, environmental, fiscal, and community challenges associated with accommodating a large increment of the City's growth. Regarding schools, the SEDA Specific Plan includes policies which call for the City to coordinate with Sanger Unified in the process of establishing specific locations for public schools, and for the City to pursue agreements to share facilities between schools and other community-serving institutions (see Policies PF-1.1 and 1.2).

c. Zoning

In the vicinity of the project site, unincorporated areas are subject to zoning designations set forth in the Fresno County Zoning Ordinance, while areas that are within the City of Fresno city limits are subject to zoning designations set forth in the City of Fresno's Citywide Development Code.

The Fresno County zoning designation for the proposed project site is "AL-20" (Limited Agriculture, 20-acre minimum parcel size). Surrounding Fresno County zoning designations to the south and east include "AL-20" and "AE-20" (Exclusive Agriculture, 20-acre minimum parcel size). The Fresno County Zoning Ordinance describes these zone districts as follows:

- Limited Agriculture (AL) - The "AL" District is a limited agricultural district. It is intended to protect the general welfare of the agricultural community by limiting intensive uses in agricultural areas where such uses may be incompatible with, or injurious to, other less intensive agricultural operations. The District is also intended to reserve and hold certain lands for future urban use by permitting limited agriculture and by regulating those more intensive agricultural uses which, by their nature, may be injurious to non-agricultural uses in the vicinity or inconsistent with the express purpose of reservation for future urban use.
- Agricultural Exclusive (AE) - The "AE" District is intended to be an exclusive district for agriculture and for those uses which are necessary and an integral part of the agricultural operation. This district is

intended to protect the general welfare of the agricultural community from encroachments of non-related agricultural uses which by their nature would be injurious to the physical and economic well-being of the agricultural district.

The City of Fresno zoning designations to the north and west of the project site include "RS-4" (Residential Single-Family, Medium Low Density) and "RS-5" (Residential Single-Family, Medium Density). Per the City of Fresno Development Code, the purposes of the Residential Single-Family (RS) Districts include:

- Providing for a variety of single-family residences built to urban or suburban standards to suit a spectrum of individual lifestyles and needs and ensuring availability throughout the city of the range of housing types necessary for all segments of the community, consistent with the General Plan.
- Ensuring that the scale and design of new development and alterations and additions to existing residences are compatible with the scale, mass, and character of their neighborhoods.
- Providing sites for neighborhood-serving uses such as parks, family day cares, libraries, and community facilities.

d. Transportation Network

Streets and Highways: The only existing street adjacent to the project site is Temperance Avenue which runs along the site's eastern boundary. Temperance Avenue in the vicinity of the project is currently a north-south two-lane undivided expressway and is designated by the Fresno General Plan Circulation Element as a six-lane super arterial. The project involves the extension of Truman Avenue, an east-west two-lane local street, along the southern boundary of the project site where it would intersect with Temperance Avenue. Other streets in the vicinity of the project include Hamilton Avenue, Armstrong Avenue, California Avenue, Pitt Avenue, and Church Avenue.

Bikeways: In the vicinity of the project site, Class II Bikeways exist along portions of Armstrong Avenue, Hamilton Avenue, California Avenue and Church Avenue.

Walkways: Adjacent to the project site, pedestrian sidewalks exist to the west of the project site within Tract 6095 and to the north of the project site within Tract 5531. Pedestrian sidewalks also currently exist along portions of Armstrong Avenue, Hamilton Avenue, California Avenue, Pitt Avenue and Truman Avenue in the vicinity of the project site.

Transit: Fresno Area Express (FAX) is the transit operator in the City of Fresno. At present, there are no FAX transit routes that operate adjacent to or in the vicinity of the project.

(Please see Part E, Section 17 for additional information on streets and highways.)

e. Public Utilities and Services

Water and Sewer: The project site would be served by the City of Fresno's water and sewer system. Existing water and sewer infrastructure exist to the north and west of the site in areas within the City of Fresno city limits where urban development has occurred. The location, design, and construction of water and sewer facilities serving the project site would be subject to review and approval by the City of Fresno.

Storm Water Drainage: The Fresno Metropolitan Flood Control District (FMFCD) is responsible for managing urban stormwater runoff within the Fresno-Clovis area. The site is within FMFCD Drainage Area "BM" and will be served by future pipeline planned along Temperance Avenue. The District will enter into an agreement with FMFCD for drainage service.

Solid Waste: The City of Fresno's Solid Waste Management Division is responsible for the collection of municipal solid waste, recyclables, and green waste within the Fresno city limits. Sanger Unified contracts with a private waste hauler, Waste Management, for solid waste services.

Police and Fire Services: The Fresno Police Department provides law enforcement services, and the Fresno Fire Department provides fire protection services within the City of Fresno.

(Please see Part E, Sections 15 and 19 for additional information on Public Services and Utilities.)

7. Request for Preliminary Comment

The District distributed a Request for Preliminary Comment for the proposed school project to responsible agencies and other agencies that might have an interest in the project. The Request provided an opportunity for the agencies to comment on the potential environmental effects of the project, including whether an Environmental Impact Report, Mitigated Negative Declaration, or Negative Declaration should be prepared for the project. The District also sent the Request to residents and property owners in the project vicinity. Responses from reviewing agencies have been taken into consideration in the analysis presented in this Initial Study. There were no comments from property owners or residents.

8. Other Public Agencies Whose Approval is Required

Implementation of the proposed school project would require approvals from other public agencies in addition to the District. Table A-2 lists the agencies and the nature of the approvals.

TABLE A-2

Responsible Agencies

Public Agency	Approval(s)
California Department of Education, School Facilities Planning Division	Review and approve proposed school for conformance with applicable state rules and regulations governing the siting and development of public schools.
California Department of Toxic Substances Control	Responsible for ensuring that the proposed school sites are free of contamination or, if the properties were previously contaminated, that they have been cleaned up to a level that protects the students and staff who will occupy the new schools. Review and approve compliance with Education Code sections 17213.1 and 17213.2.
City of Fresno	Review and approve the location, design, and construction of, water, sewer, and street improvements.
County of Fresno	Planning Commission: Determine if the project is consistent with the Fresno County General Plan. *(Note: On June 19, 2019, the Fresno County Planning Commission adopted Resolution No. 12783 finding that the school site was in conformance with the Fresno County General Plan.*
Fresno Local Agency Formation Commission	Approve annexation of school site to City of Fresno.
Fresno Metropolitan Flood Control District	Review and approve the location, design, and construction of flood control improvements.
San Joaquin Valley Air Pollution Control District	Compliance with applicable rules and regulations, including but not limited to Regulation VIII and Rule 9510 (Indirect Source Review).

B. Environmental Factors Potentially Affected

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

Table B-1
Environmental Factors Potentially Affected

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

C. Determination

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

10/26/2022

Signature — Date

Ryan Kilby — Chief Operations Officer

Print Name — Title

D. Evaluation of Environmental Impacts

1. State CEQA Guidelines Appendix G: Environmental Checklist Form

Part E in this Initial Study addresses all of the environmental issues that Appendix G of the State CEQA Guidelines suggests an Initial Study should address. In addition, it addresses several environmental issues that the California Department of Education requires be considered in the selection and approval of a school site.

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

The "potentially significant" determination is applied if there is substantial evidence that an effect may be significant. Under the State CEQA Guidelines, a significant effect, or impact, on the environment means a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. (sec. 15382) The District must prepare an Environmental Impact Report for the project if the Initial Study identifies one or more potentially significant impacts that cannot be mitigated to a less than significant level.

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

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

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

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

This Initial Study incorporates by reference all documents and other sources of information cited in Sections E and H, Sources Consulted.

2. Existing Laws, Regulations and Policies

Introduction: In some cases, an impact that might appear significant is determined to be less than significant because it is subject to state, regional, or local laws, regulations, or policies, the application of which would reduce the impact to a less than significant level or avoid the impact entirely. In evaluating impacts, this Initial Study considered the applicable laws, regulations, and policies to determine the effect they would have on preventing or reducing potentially significant impacts. The Initial Study, however, does not cite them as mitigation measures because they would apply to the project regardless of the outcome of the Initial Study.

For the proposed project, applicable laws, regulations, and policies include but are not limited to the following:

State of California

The selection and approval of a site for a public school in California is subject to numerous state rules and regulations, most of which the California Department of Education administers to protect the health and safety of students and staff at the school. Before the Department of Education will approve a school site and the school becomes eligible for state funding, a school district must certify that "the proposed site is suitable for educational purposes and is free, or will be free prior to occupancy, from hazards that could be considered

harmful to student and staff health and safety. The school district has complied with and will comply with all applicable laws and policies associated with the acquisition of the school site, including commitments for Department of Toxic Substances Control required activities…" (SFPD 4.03, 2). The state requirements include but are not limited to the following:

- *Education Code Section 17210-17224:* Specifies the environmental review process the Department of Toxic Substance Control (DTSC) administers for new school sites. DTSC ensures that proposed school sites are free of contamination or, if the properties were previously contaminated, that they have been cleaned up to a level that protects the students and staff who will occupy the new school. All proposed school sites that will receive State funding for acquisition or construction are required to go through a rigorous environmental review and cleanup process under DTSC's oversight.
- *Education Code Section 17212.5; California Code of Regulations, Title 5, Section 14010 Geological and Other Environmental Hazards Report:* District must prepare a Geological Hazards Report and other environmental hazards report as described in Appendix H of the *School Site Selection and Approval Guide, 2000 Edition*. This will include a survey of high-pressure pipelines, liquid storage tanks, railroads, airports, electrical transmission lines, and areas subject to flooding, dam inundation, seismic faulting, and liquefaction.
- *Education Code Section 17213, Public Resources Code Section 21151.8; and California Code of Regulations, Title 5, Section 14011(h),(i); Title 14, Section 15093:* Requires District Board to adopt findings stating: (1) the proposed school site is not a current or former waste disposal site; (2) the site is not a hazardous substance release site; (3) the site does not contain pipelines; and (4) whether a qualified freeway and/or qualified traffic corridor is located within 500 feet of the site. In addition, board-adopted findings are required for hazardous air emitters and hazardous material handlers located within one-quarter mile of the site.
- *Education Code Section 17215 and California Code of Regulations, Title 21, Division 2.5, Chapter 2.1:* airports: Requires providing a notice to the State Department of Education if a proposed school site is within two nautical miles, measured by air line, of that point on an airport runway or a potential runway included in an airport master plan that is nearest to the site. The Department of Education is required to consult with the Department of Transportation as to the safety of the site in relation to airport operations.
- *Public Resources Code Section 21151.2 and Government Code sections 53094, 65402(c):* Require consultation with the local Planning Commission to determine conformity of proposed school site with the general plan (Note: Under these statutes, school districts can overrule city or county findings on general plan conformity and render the zoning ordinance inapplicable to school district property)
- *Public Resources Code Section 21151.4:* Addresses CEQA consultation requirements for the proposed construction or alteration of a facility within one-quarter mile of school that might reasonably be anticipated to emit or handling of hazardous or acutely hazardous material.
- *Title 5, California Code of Regulations, Article 2, Section 14010, Standards for School Site Selection:* The standards address: possible hazards related to power line easements, railroads, airports, major streets, above ground pipelines, underground pipelines, above ground storage tanks, traffic, noise, seismicity, geology, soils, flooding, dam flood inundation, incompatible zoning, and other safety-related factors.
- *Title 24, California Code of Regulations, Part 1 through Part 12:* Specifies the State of California building regulations for public schools. The Division of the State Architect (DSA) is responsible for administering the regulations.

Fresno County

- Fresno County General Plan
  https://www.co.fresno.ca.us/home/showdocument?id=18117

- Fresno County Code of Ordinances
  https://library.municode.com/ca/fresno_county/codes/code_of_ordinances

Fresno County Department of Public Health, Division of Environmental Health

The Division of Environmental Health is responsible overseeing state-mandated CUPA/Hazmat programs, which include the following: Hazardous Materials Business Plan (HMBP), California Accidental Release Program (CalARP), Underground Storage Tank Program (UST), Aboveground Storage Tank Program (APSA), Hazardous Waste Generator Program, and Tiered Permitting Program. The division is also responsible for permitting and inspecting retail food businesses (including school cafeterias), reviewing construction plans and inspection of new and remodeled food facilities, investigating complaints regarding violations involving unsanitary conditions, investigating suspected food borne illnesses, etc. (https://www.co.fresno.ca.us/departments/public-health/environmental-health)

City of Fresno

- Fresno General Plan
  https://www.fresno.gov/darm/wp-content/uploads/sites/10/2019/07/Consolidated-GP-7-2019.pdf
- Roosevelt Community Plan
  https://www.fresno.gov/darm/wp-content/uploads/sites/10/2016/11/RooseveltCommunityPlan.pdf
- Fresno Code of Ordinances
  https://library.municode.com/ca/fresno/codes/code_of_ordinances
- Standard Drawings
  https://www.fresno.gov/publicworks/wp-content/uploads/sites/17/2016/09/CityofFresnoStandardDrawings2016Feb.pdf

Fresno Metropolitan Flood Control District

- Fresno Metropolitan Flood Control District Storm Drainage and Flood Control Master Plan.
  https://fmfcd.maps.arcgis.com/apps/webappviewer/index.html?id=5ac65186b1794949a1fda62ca7734986

San Joaquin Valley Air Pollution Control District

The project may be subject to compliance with Air District rules, including Regulation VIII – Fugitive PM10 Prohibitions, and Regulation IX – Mobile and Indirect Sources. (https://www.valleyair.org/rules/1ruleslist.htm)

3. Technical Studies

The analyses of several resources and conditions in this Initial Study are based on technical background studies in the areas of Air Quality, Cultural Resources, Energy, Greenhouse Gas Emissions, Noise and Groundborne Vibration, and Transportation. The studies are listed in the Table of Contents and Section H (Sources Consulted) and are presented as Appendices to this Initial Study.

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E. Environmental Checklist

The questions in Sections 1-21 below are from the State CEQA Guidelines, Appendix G: Environmental Checklist Form, Evaluation of Environmental Impacts.

1. Aesthetics

Except as provided in Public Resources Code § 21099, would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Have a substantial adverse effect on a scenic vista?			✓	
b. Substantially damage scenic resources, including, but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway?				✓
c. In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from 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 light and glare that would adversely affect day or nighttime views in the area?			✓	

Impact Discussion

a. Less Than Significant Impact:

Major scenic vistas within the greater Fresno area include the Sierra Nevada foothills and mountains, the San Joaquin River, and the downtown Fresno skyline. Due to the distance of the project site from these resources, the project site and the adjoining land do not constitute a scenic vista, and the project would not block any vistas in the area, scenic or otherwise.

b. No Impact:

The project site is not within a state scenic highway and does contain scenic resources such as trees and rock outcroppings.

c. Less Than Significant Impact:

Although the project would change the visual character of the site, it would not cause a substantial degradation of the existing visual character and/or quality of the site and its surroundings. The project would develop primarily vacant land (that also includes a single-family residence, a small farming area with row crops, and miscellaneous landscaping) into an elementary school campus. As determinations of visual character often vary from person to person, it is possible that some residents in the area may consider the change from rural to urban visual character an adverse impact, while others may consider development of the proposed project to be an improvement over the existing site. It is important to note, however, that the City of Fresno has planned the subject site and surrounding

land for urban development, and the conversion of the site from rural to urban visual character has been contemplated as part of the long-range planning for the area. Additionally, educational facilities are common visual elements in an urban setting as is surrounding the site. Schools are typically a common and congruent visual feature within residential areas, and schools designed for predominantly residential neighborhoods typically have classroom and administrative buildings which are visually compatible or congruent with the surrounding community. Further, the project would not conflict with any policies or regulations set forth in the City of Fresno General Plan or City of Fresno Development Code related to scenic quality. Based on these factors, this impact will be less than significant.

d. Less Than Significant Impact:

The project includes features that may increase light and glare in its vicinity. The campus's buildings and parking areas that will be lighted in the evenings for safety and security purposes, and its athletic fields may be lighted in order to allow for use during low-light conditions. Additionally, headlights from vehicles arriving and departing the school during early morning and evening hours would be a potential source of glare from the project.

The project's lighting would not be unusual within the urban environment that is planned for (and to some extent, has already begun developing within) the project site's vicinity. Further, the California Energy Code and City of Fresno Development Code set forth requirements for the design and configuration of lighting fixtures and equipment, and compliance with applicable requirements will reduce the risk of unwanted light trespass and glare from occurring. Therefore, impacts related to lighting and glare will be less than significant.

2. Agriculture and Forestry Resources

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

Impact Discussion

a. Less Than Significant Impact:

The Fresno County Important Farmland 2018 map (the most current map available) identifies the project site as containing approximately 13 acres of Farmland of Local Importance, four acres of Unique Farmland, and one acre of Prime Farmland. Based on a review of satellite imagery, the lower portion of the site on APN 316-160-46 (4.95 acres) appears to have been farmed with row crops intermittently during the last 10-12 years, while the upper portion of the site on APN 316-160-72 (12.84 acres) does not appear to have been utilized for farming purposes for at least 20 years.

While the project would affect approximately five total acres of Unique and Prime Farmland, the project would not result a conversion that is considered to be significant for purposes of CEQA. The site is within a rapidly urbanizing area and abuts urban residential development on two sides. The EIR for the 2014 City of Fresno General Plan previously evaluated impacts that would result from development of the planned land uses set forth in the City's General Plan, including the conversion of areas designated as Farmland to urbanized uses. The project site was encompassed in this evaluation, as it is located within the City's Sphere of influence and long planned for urban development in the City's General Plan. The EIR determined that the conversion of Farmland to urban uses would be a significant and unavoidable impact, with no feasible mitigation measures available to avoid or reduce the impact. Implementation of the project would not result in a conversion of Farmland beyond what was previously considered as part of the City of Fresno General Plan EIR. Further, it is noted that areas with less than 20 acres (such as the project site) are generally considered to be too small to constitute significant agricultural resources, as is reflected by the 20-acre minimum parcel size criteria for Williamson Act contracts and Fresno County's agricultural zoning designations. Therefore, this impact is less than significant.

b. No Impact:

The project would not conflict with zoning for agricultural use. The Fresno County zoning designation for the proposed project site is "AL-20" (Limited Agriculture, 20-acre minimum parcel size), and the AL-20 zone district allows for the development of public school facilities. The AL-20 zone district is also intended to reserve and hold certain lands for future urban use by permitting limited agriculture and by regulating those more intensive agricultural uses which, by their nature, may be injurious to non-agricultural uses in the vicinity or inconsistent with the express purpose of reservation for future urban use. Additionally, the project site is not subject to a Williamson Act contract.

c.-d. No Impact:

No impacts to forestry resources would occur as a result of the project. There are no forestland or timberland areas or areas zoned for timberland production within the greater Fresno area where the project site is located.

e. Less Than Significant Impact:

Development of the proposed elementary school campus would not result in substantial changes to the existing environment that would lead to significant impacts involving the conversion of Farmland to non-agricultural use. The project site and vicinity are located within the City of Fresno's Sphere of Influence and designated for urban use by the City's General Plan, which is where urban growth and development is intended to be directed per the long-range planning policies of both the City of Fresno and the County of Fresno. No areas within the City's SOI in the vicinity of the project are designated for future agricultural use in the City of Fresno General Plan. The physical form and operational character of the elementary school would be similar to the already-existing urbanized uses in the vicinity (e.g., single-family residential development located to the north and west of the project site). Regarding forestland, as mentioned in Sections 6.2(c) and (d), there is no forestland present which could be affected by the project. Based on these factors, this impact is considered less than significant.

3. Air Quality

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Conflict with or obstruct implementation of the applicable air quality plan?		✓		
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality?			✓	
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?			✓	

This section is based on the Air Quality & Greenhouse Gas Impact Assessment completed by Ambient Air Quality & Noise Consulting, which is included as Appendix 1 of this Initial Study. Table 3-1 provides definitions for the air quality terms used in this section.

TABLE 3-1
Air Quality Definitions

Carbon Monoxide (CO)

A colorless, odorless gas resulting from the incomplete combustion of hydrocarbon fuels. CO interferes with the blood's ability to carry oxygen to the body's tissues and results in numerous adverse health effects. Over 80 percent of the CO emitted in urban areas is contributed by motor vehicles. CO is a criteria air pollutant.

Nitrogen Oxides (Oxides of Nitrogen, NO_X)

A general term pertaining to compounds of nitric oxide (NO), nitrogen dioxide (NO2) and other oxides of nitrogen. Nitrogen oxides are typically created during combustion processes and are major contributors to smog formation and acid deposition. NO_2 is a criteria air pollutant and may result in numerous adverse health effects.

Particulate Matter (PM)

Any material, except pure water, that exists in the solid or liquid state in the atmosphere. The size of particulate matter can vary from coarse, wind-blown dust particles to fine particle combustion products.

$PM_{2.5}$

Includes tiny particles with an aerodynamic diameter less than or equal to a nominal 2.5 microns. This fraction of particulate matter penetrates most deeply into the lungs.

PM_{10} (Particulate Matter)

A criteria air pollutant consisting of small particles with an aerodynamic diameter less than or equal to a nominal 10 microns (about 1/7 the diameter of a single human hair). Their small size allows them to make their way to the air sacs deep within the lungs where they may be deposited and result in adverse health effects. PM_{10} also causes visibility reduction.

Reactive Organic Gas (ROG)

A photochemically reactive chemical gas, composed of non-methane hydrocarbons, that may contribute to the formation of smog. Also sometimes referred to as Non-Methane Organic Gases (NMOGs). (See also Volatile and Hydrocarbons.)

TABLE 3-1
Air Quality Definitions

Sulfur Dioxide (SO_2)
A strong smelling, colorless gas that is formed by the combustion of fossil fuels. Power plants, which may use coal or oil high in sulfur content, can be major sources of SO_2 and other sulfur oxides contribute to the problem of acid deposition. SO_2 is a criteria air pollutant.
Toxic Air Contaminants (TAC)
An air pollutant which may cause or contribute to an increase in deaths or in serious illness, or which may pose a present or potential hazard to human health. Health effects to TACs may occur at extremely low levels and it is typically difficult to identify levels of exposure which do not produce adverse health effects.
Source: California Air Resources Board. *Glossary of Air Pollution Terms* (2015)

Impact Discussion

a. Less Than Significant Impact with Mitigation Incorporated:

The project's potential air quality impacts are evaluated based on the San Joaquin Valley Air Pollution Control District's Guide for Assessing and Mitigating Air Quality Impacts (SJVAPCD 2015). This guidance document includes recommended thresholds of significance to be used for the evaluation of short-term construction, long-term operational, odor, TAC, and cumulative air quality impacts. Accordingly, the SJVAPCD-recommended thresholds of significance are used to determine whether implementation of the proposed project would result in a significant air quality impact. (Refer to Appendix 1 for additional detail regarding the thresholds.)

As noted in Section 3(b), short-term construction and long-term operational emissions would not exceed applicable thresholds of significance. In addition, based on the traffic analysis prepared for this project, the existing average vehicle miles traveled (VMT) to existing schools is 3.4 miles (round-trip). Upon completion of the proposed project, the average VMT is projected to be 2.4 miles (round-trip). Therefore, implementation of the proposed project is anticipated to result in an overall reduction in VMT and associated emissions due to student-related trips. However, as noted in Section 3(c), the proposed project could result in a significant contribution to localized PM concentrations for which the SJVAB is currently designated nonattainment. For this reason, implementation of the proposed project could conflict with air quality attainment or maintenance planning efforts. Therefore, this impact would be considered potentially significant.

Mitigation Measure: Implement Mitigation Measure AQ-1 (refer to Section 3(c)).

Level of Significance after Mitigation: With implementation of Mitigation Measure AQ-1 this impact would be considered less than significant.

b. Less Than Significant Impact:

The proposed project is located adjacent to the City of Fresno, which is within the SJVAB. The SJVAB is designated as a nonattainment area with respect to the state O_3, PM_{10}, and $PM_{2.5}$ standards; and the national 8-hour O_3 and $PM_{2.5}$ standards. Potential air quality impacts associated with the proposed project could occur during project construction or operation. Short-term construction and long-term air quality impacts associated with the proposed project are discussed, as follows:

Short-term Construction Emissions

Short-term increases in emissions would occur during the construction phase. Construction-generated emissions are of temporary duration, lasting only as long as construction activities occur, but have the potential to cause a significant air quality impact. The construction of the proposed project would result in the temporary generation of emissions associated with motor vehicle exhaust from construction equipment and worker trips; as well as the movement of construction equipment on unpaved surfaces.

Estimated annual construction-generated emissions are summarized in Table AQ-4 of Appendix 1. Construction of the proposed project would generate maximum annual emissions of approximately 0.74 tons/year of ROG, 2.63 tons/year of NO_X, 2.50 tons/year of CO, less than 0.01 tons/year of SO_2, 0.37 tons/year of PM_{10}, and 0.23 tons/year of $PM_{2.5}$. Estimated construction-generated annual emissions would not exceed the SJVAPCD's significance thresholds of 10 tons/year of ROG, 10 tons/year of NO_X, 100 tons/year of CO, 27 tons/year of SO_X, 15 tons/year of PM_{10}, or 15 tons/year of $PM_{2.5}$.

Also summarized in Table AQ-4 are estimated average-daily on-site construction-generated emissions. As shown, construction of the proposed project would generate maximum average-daily emissions of approximately 5.12 pounds/day of ROG, 17.43 pounds/day of NO_X, 17.68 pounds/day of CO, 0.03 pounds/day of SO_2, 2.17 pounds/day of PM_{10}, and 1.38 pounds/day of $PM_{2.5}$. Estimated construction-generated daily on-site emissions would not exceed the SJVAPCD's significance thresholds of 100 pounds/day of ROG, 100 pounds/day of NO_X, 100 pounds/day of CO, 100 pounds/day of SO_X, 100 pounds/day of PM_{10}, or 100 pounds/day of $PM_{2.5}$.

Short-term construction of the proposed project would not result in a significant impact on regional or local air quality conditions. Given that project-generated emissions would not exceed applicable SJVAPCD significance thresholds, this impact would be considered less than significant.

Long-term Operational Emissions

Estimated annual operational emissions for the anticipated opening year (year 2024) of the proposed project are summarized in Table AQ-5 of Appendix 1. As depicted, the proposed project would result in annual operational emissions of approximately 0.75 tons/year of ROG, 0.87 tons/year of NO_X, 4.54 tons/year of CO, 0.01 tons/year of SO2, 1.08 tons/year of PM_{10}, and 0.30 tons/year of $PM_{2.5}$. Estimated operational-generated annual emissions would not exceed the SJVAPCD's significance thresholds of 10 tons/year of ROG, 10 tons/year of NO_X, 100 tons/year of CO, 27 tons/year of SO_X,15 tons/year of PM_{10}, or 15 tons/year of $PM_{2.5}$.

Operation of the proposed project would generate maximum daily on-site emissions of approximately 8.29 pounds/day of ROG, 9.68 pounds/day of NO_X, 50.46 pounds/day of CO, 0.12 pounds/day of SO_2, 11.95 pounds/day of PM_{10}, and 3.31 pounds/day of $PM_{2.5}$. Estimated operational-generated daily on-site emissions would not exceed the SJVAPCD's significance thresholds of 100 pounds/day of ROG, 100 pounds/day of NO_X, 100 pounds/day of CO, 100 pounds/day of SO_X, 100 pounds/day of PM_{10}, or 100 pounds/day of $PM_{2.5}$.

Long-term operation of the proposed project would not result in a significant impact on regional or local air quality conditions. Operational emissions would be projected to decline in future years, with improvements in fuel consumption emissions standards. It is important to note that estimated operational emissions are conservatively based on the default vehicle fleet distribution assumptions contained in the model, which include contributions from medium and heavy-duty trucks. Mobile sources associated with the proposed land use would consist predominantly of light-duty vehicles. As a result, actual mobile source emissions would likely be less than estimated. Operational emissions would not exceed applicable SJVAPCD significance thresholds, this impact would be considered less than significant.

c. Less Than Significant Impact with Mitigation Incorporated:

Sensitive land uses located in the vicinity of the proposed project site consist predominantly of residential dwellings. The nearest residential dwellings are located adjacent to the northern, southern, and western property boundaries. Long-term operational and short-term construction activities and emission sources that could adversely impact the nearest sensitive receptors are discussed, as follows:

Long-term Operation

Localized Mobile-Source CO Emissions

CO is the primary criteria air pollutant of local concern associated with the proposed project. Under specific meteorological and operational conditions, such as areas of heavily congested vehicle traffic, CO concentrations may reach unhealthy levels. If inhaled, CO can be adsorbed easily by the bloodstream and inhibit oxygen delivery to the body, which can cause significant health effects ranging from slight headaches to death. The most serious effects

are felt by individuals susceptible to oxygen deficiencies, including people with anemia and those suffering from chronic lung or heart disease.

Mobile-source emissions of CO are a direct function of traffic volume, speed, and delay. The transport of CO is extremely limited because it disperses rapidly with distance from the source under normal meteorological conditions. For this reason, modeling of mobile-source CO concentrations is typically recommended for sensitive land uses located near signalized roadway intersections that are projected to operate at unacceptable levels of service (LOS). Localized CO concentrations associated with the proposed project would be considered less-than-significant if: (1) traffic generated by the proposed project would not result in deterioration of a signalized intersection to LOS E or LOS F; or (2) the project would not contribute additional traffic to a signalized intersection that already operates at LOS E or LOS F.

There are no nearby signalized intersections in the project area. As a result, the proposed project would not be anticipated to contribute substantially to localized CO concentrations that would exceed applicable standards. For this reason, this impact would be considered less than significant.

Toxic Air Contaminants

Implementation of the proposed project would not result in the long-term operation of any major onsite stationary sources of TACs, nor would project implementation result in a significant increase in diesel-fueled vehicles traveling along area roadways. In addition, no major permitted stationary sources of emissions were identified within one-quarter mile of the project site (SJVAPCD 2021; refer to Appendix B of the Air Quality & Greenhouse Gas Impact Assessment). For these reasons, long-term increases in exposure to TACs would be considered less than significant.

Short-term Construction

Naturally Occurring Asbestos

Naturally-occurring asbestos, which was identified by ARB as a TAC in 1986, is located in many parts of California and is commonly associated with ultramafic rock. The project site is not located near any areas that are likely to contain ultramafic rock. As a result, the risk of exposure to asbestos during construction would be considered less than significant.

Asbestos-Containing Materials

Demolition activities can have potential negative air quality impacts, including issues surrounding proper handling, demolition, and disposal of asbestos-containing material (ACM). Asbestos-containing materials could be encountered during the demolition of existing buildings, particularly older structures constructed prior to 1970. Asbestos can also be found in various building products, including (but not limited to) utility pipes/pipelines (transite pipes or insulation on pipes). If a project will involve the disturbance or potential disturbance of ACM, various regulatory requirements may apply, including the requirements stipulated in the Title 40 Code of Federal Regulations (CFR) Part 61, Subpart M-Asbestos NESHAP. These requirements include but are not limited to 1) notification, within at least 10 business days of activities commencing, to the SJVAPCD, 2) an asbestos survey conducted by a Certified Asbestos Consultant, and 3) applicable removal and disposal requirements of identified ACM. The proposed project would include the demolition of an existing building that is known to have ACM. With adherence to applicable asbestos-related regulations, this impact would be considered less than significant.

Lead-Coated Materials

Demolition of structures coated with lead-based paint can have potential negative air quality impacts and may adversely affect the health of nearby individuals. Lead-based paints could be encountered during the demolition of existing buildings, particularly older structures constructed prior to 1978. Improper demolition can result in the release of lead-containing particles from the site. Sandblasting or removal of paint by heating with a heat gun can result in significant emissions of lead. In such instances, proper abatement of lead before demolition of these structures must be performed in order to prevent the release of lead from the site. Federal and State lead regulations, including the Lead in Construction Standard (29 CFR 1926.62) and California Code of Regulations (CCR) Title 8, Section 1532.1, Lead, regulate disturbance of lead-containing materials during construction, demolition, and

maintenance-related activities. The proposed project would include the demolition of an existing building that is known to have lead-coated material. With the compliance of 29 CFR 1926.62 and CCR Title 8, Section 1532.1, this impact would be considered less than significant.

Toxic Air Contaminants (Diesel-Exhaust Emissions)

Implementation of the proposed project would result in the generation of DPM emissions during construction associated with the use of off-road diesel equipment for construction activities. Health-related risks associated with diesel exhaust emissions are primarily associated with long-term exposure and associated risk of contracting cancer. The use of diesel-powered construction equipment, however, would be temporary and episodic and would occur over a relatively large area. Exposure to construction-generated DPM would not be anticipated to exceed applicable thresholds (i.e., incremental increase in cancer risk of 20 in one million). In addition, implementation of Mitigation Measure AQ-1 would result in further reductions of on-site DPM emissions. For these reasons, this impact would be considered less than significant.

Localized PM Concentrations

Fugitive dust emissions would be primarily associated with site preparation and grading, and vehicle travel on unpaved and paved surfaces. On-site off-road equipment and trucks would also result in short-term emissions of DPM, which could contribute to elevated localized concentration at nearby receptors. Uncontrolled emissions of fugitive dust may also contribute to increased occurrences of Valley Fever and potential increases in nuisance impacts to nearby receptors. For these reasons, localized uncontrolled concentrations of construction-generated PM would be considered to have a potentially significant impact.

Mitigation Measures AQ-1 through AQ-9: Measures to Reduce Localized Pollutant Concentrations Upon Sensitive Receptors

AQ-1. On-road diesel vehicles shall comply with Section 2485 of Title 13 of the California Code of Regulations. This regulation limits idling from diesel-fueled commercial motor vehicles with gross vehicular weight ratings of more than 10,000 pounds and licensed for operation on highways. It applies to California and non-California-based vehicles. In general, the regulation specifies that drivers of said vehicles:

a. Shall not idle the vehicle's primary diesel engine for greater than 5 minutes at any location, except as noted in Subsection (d) of the regulation; and,

b. Shall not operate a diesel-fueled auxiliary power system to power a heater, air conditioner, or any ancillary equipment on that vehicle during sleeping or resting in a sleeper berth for greater than 5.0 minutes at any location when within 1,000 feet of a restricted area, except as noted in Subsection (d) of the regulation.

AQ-2. Heavy-duty, off-road diesel-fueled equipment (50 horsepower, or greater) shall comply with the 5-minute idling restriction identified in Section 2449(d)(2) of the California Air Resources Board's In-Use Off-Road Diesel regulation.

AQ-3. Heavy-duty, off-road diesel-fueled equipment (50 horsepower, or greater) shall be fitted with diesel particulate filters, per manufacturer's recommendations, or shall meet at minimum Tier 3 emissions standards. To the extent locally available, tier 4 should be used.

AQ-4. Signs shall be posted at the project site construction entrance to remind drivers and operators of the state's 5-minute idling limit.

AQ-5. To the extent available, replace fossil-fueled equipment with alternatively-fueled (e.g., natural gas) or electrically-driven equivalents.

AQ-6. Construction truck trips shall be scheduled, to the extent feasible, to occur during non-peak hours.

AQ-7. The burning of vegetative material shall be prohibited.

AQ-8. The proposed project shall comply with SJVAPCD Regulation VIII for the control of fugitive dust emissions. Regulation VIII can be obtained on the SJVAPCD's website at website URL: https://www.valleyair.org/rules/1ruleslist.htm. At a minimum, the following measures shall be implemented:

a. All disturbed areas, including storage piles, which are not being actively utilized for construction purposes, shall be effectively stabilized of dust emissions using water, chemical stabilizer/suppressant, covered with a tarp or other suitable cover or vegetative ground cover.

b. All on-site unpaved roads and off-site unpaved access roads shall be effectively stabilized of dust emissions using water or chemical stabilizer/suppressant.

c. All land clearing, grubbing, scraping, excavation, land leveling, grading, cut & fill, and demolition activities shall be effectively controlled of fugitive dust emissions utilizing application of water or by presoaking.

d. With the demolition of buildings up to six stories in height, all exterior surfaces of the building shall be wetted during demolition.

e. When materials are transported off-site, all material shall be covered, or effectively wetted to limit visible dust emissions, and at least six inches of freeboard space from the top of the container shall be maintained.

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

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

h. Within urban areas, trackout shall be immediately removed when it extends 50 or more feet from the site and at the end of each workday.

i. An owner/operator of any site with 150 or more vehicle trips per day, or 20 or more vehicle trips per day by vehicles with three or more axles shall implement measures to prevent carryout and trackout.

j. An-road vehicle speeds on unpaved surfaces of the project site shall be limited to 15 mph).

k. Sandbags or other erosion control measures shall be installed sufficient to prevent silt runoff to public roadways from sites with a slope greater than one percent.

l. Install wheel washers for all exiting trucks or wash off all trucks and equipment leaving the site.

m. Install wind breaks at windward side(s) of construction areas.

n. Excavation and grading activities shall be suspended when winds exceed 20 mph (Regardless of wind speed, an owner/operator must comply with Regulation VIII's 20 percent opacity limitation).

o. Limit area subject to excavation, grading, and other construction activity at any one time.

AQ-9. The above measures for the control of construction-generated emissions shall be made available to project contractors and included on site grading and construction plans.

Level of Significance After Mitigation: As discussed above, only localized PM concentrations are considered to be potentially significant. Mitigation Measures AQ-1 through AQ-9 include measures to ensure compliance with applicable regulatory requirements. The measures would reduce construction-generated emissions that could contribute to increased localized pollutant concentrations at nearby sensitive receptors. Some measures include requirements that heavy-duty off-road equipment be fitted with diesel-particulate filters or meets Tier 3 emissions standards. With mitigation, this impact would be less than significant.

d. Less Than Significant Impact:

Other emissions potentially associated with the proposed project would be predominantly associated with the occasional generation of odors during project construction. The occurrence and severity of odor impacts depend on numerous factors, including the nature, frequency, and intensity of the source; wind speed and direction; and the sensitivity of the receptors. While offensive odors rarely cause any physical harm, they still can be unpleasant, leading to increases in annoyance among the public and may generate citizen complaints to local governments and regulatory agencies. Land uses commonly considered to be potential sources of offensive odorous emissions include agriculture (e.g., farming and livestock), wastewater treatment plants, food processing plants, chemical plants, composting facilities, refineries, landfills, dairies, and fiberglass molding facilities.

The construction of the proposed project would involve the use of a variety of gasoline or diesel-powered equipment that would emit exhaust fumes. Exhaust fumes, particularly diesel exhaust, may be considered objectionable by some people. In addition, pavement coatings and architectural coatings used during project construction would also emit temporary odors. However, construction-generated emissions would be temporary, would occur intermittently throughout the workday, and would dissipate rapidly within increasing distance from the source. As a result, short-term construction activities would not expose a substantial number of people to frequent odorous emissions. This impact would be considered less than significant.

4. Biological Resources

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U. S. Fish and Wildlife Service?		✓		
b. Have a substantially adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or U. S. Wildlife Service?				✓
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 resident or migratory fish or wildlife species or with established native resident migratory wildlife corridors, or impede the use of native wildlife nursery sites?			✓	

e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				✓
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?				✓

Impact Discussion

a. Less Than Significant Impact with Mitigation Incorporated:

The project is located in a setting where urbanized development meets rural and agricultural uses. The project site itself consists of primarily vacant land but also includes a single-family residence and an area that has been utilized for row crops in recent history. The areas to the north and west of the site have been developed with single-family homes and other features typical of a suburban residential neighborhood (e.g., sidewalks, streets, and solid fencing between residences). The areas to the south and east of the site include a mixture of rural residential uses and agricultural uses (orchards and row crops). As such, the area experiences a substantial amount of disturbance from humans, vehicles, and domestic animals.

Vegetation Communities

For areas within the City of Fresno's Sphere of Influence (including the project site), the City of Fresno General Plan MEIR identifies and discusses different types of vegetation communities that are present. The project site includes land that would be classified as Barren and Irrigated Row and Field Crops. Areas surrounding the project site include land classified as Deciduous Orchard, Irrigated Row and Field Crops, Barren, and Urban. Following is a description of the types of vegetation communities present at the project site and its vicinity:

> ***Deciduous Orchard:*** Deciduous orchard communities occur along the western, southern and eastern margins of the Planning Area, where there are flat alluvial soils on valley floors, rolling foothills and relatively steep slopes. Orchard communities are typically comprised of artificially irrigated habitat dominated by one, sometimes several, tree or shrub species planted for cultivation. Trees are typically low and bushy, and the understory is open, with little ground cover. Deciduous orchard is a relatively disturbed vegetation community and contains very little groundcover and planted trees that provide moderately suitable habitat for only one special-status species, California horned lark.
>
> ***Irrigated Row and Field Crops:*** Irrigated row and field crop communities frequently occur in floodplains or upland areas with high soil quality. Irrigated row and field crows include annual and perennial crops, grown in rows, with open space between the rows. Row and field crops are artificially irrigated and feature a moderate disturbance rate by vehicle and pedestrian encroachment typically associated with farming activities. Species composition changes frequently, both by season and by year. Since irrigated row and field crops contain active agriculture, and are therefore significantly disturbed with altered substrates, this vegetation community does not provide suitable habitat for any special-status plant species and limited habitat for special-status wildlife species. Special-status wildlife species with a potential to occur within this vegetation community include: burrowing owl, California horned lark, and Swainson's hawk.
>
> ***Barren:*** Barren lands include areas in which the vegetative cover comprises less than 10 percent of the surface area (disregarding natural rock outcrops) and where there is evidence of soil surface disturbance and compaction from previous legal human activity, and/or areas in which the vegetative cover is greater than 10 percent, soils surface compaction is evident, and building foundations and debris are present (e.g., irrigation piping, fencing, old wells, abandoned farming or mining equipment) from legal activities (as opposed to illegal dumping). Vegetation within barren land has a high predominance of non-native or

weedy species that are indicators of soil disturbance. Barren land only provides moderately suitable habitat for one special-status species, California horned lark.

Urban: Urban (or developed) lands have been constructed upon or otherwise covered with a permanent, unnatural surface (e.g., concrete, asphalt, buildings, homes, etc.) or a large amount of debris or other materials. The Planning Area consists predominately of urban areas, which are concentrated in the central portion of the Planning Area, within the Fresno city limits. Urban land is less common within the rural and agricultural portions of the Planning Area. Urban land provides poor quality habitat for any special-status species. No special-status species is expected to occur within this vegetation community.

(Source: City of Fresno General Plan MEIR, p. 5-4-4 through 5-4-11)

Special-Status Species

A background search and literature review of existing data pertaining to biological resources within the area was conducted. This included searching California Natural Diversity Database (CNDDB) and the U.S. Fish and Wildlife Service's IPaC Trust Resource List, plus other available CEQA/NEPA documents, maps, and photographs. From this review, a list of potentially occurring special status species was compiled for the project. (Note: Project-specific reference materials are included as Appendix 2.) Special status biological resources include special-status plant and wildlife species (including State or Federally designated, rare, threatened, endangered, Migratory Bird Treaty Act species, species of concern, or unique species); potential wetland/riparian habitats; sensitive plant communities; and other environmentally sensitive habitat areas. Queries indicated nine species with special status occur or have historically occurred within the project area. Many of the species from the generated list were historic, extirpated occurrences, or were species with very specialized habitat requirements that were not present on the site or within the vicinity.

Based on the review of special status species occurrences plus the conditions present at project site and its surroundings, special status bats and special status birds are addressed in more detail below:

<u>Special Status Bats</u>

The pallid bat (Antrozous pallidus) inhabits deserts, grasslands, scrublands, woodlands and open forests. They are most common in open, dry habitats with rocky areas for roosting. Bridges, buildings, and exfoliating tree bark or hollows are frequently used by this species for roost sites (H.T. Harvey 2004). Pallid bats will roost alone or in both large and small groups. Breeding occurs from October to February. Pups are born from late April to July and are volant at 4 to 6 weeks of age. Breeding colonies disperse between August and October. Therefore, within the project area, the older rural residence and the exfoliating bark and hollows of the mature trees are potential suitable roosting habitat. Open water areas such as canals, ditches, and ponding basins can provide a water and food source for bats.

Frequent human disturbance and associated noise throughout the project area (traffic, pedestrians, pets, agricultural operation) likely discourages bat roosting. Pallid bats are very sensitive to disturbance of roost sites. Disturbance reduces metabolic economy and can greatly impact species survival (Orr 1954, Zeiner et al. 1990b). Night-time light associated with the project and sound disturbances near roosting areas and maternal colonies may disturb this species and affect bat foraging. The likelihood that pallid bat occupies the project area is very low, as disturbance makes the habitat somewhat marginal. However, direct mortality to bats could occur if a structure is demolished prior to bat eviction. Vibration, noise, and light caused by construction equipment could result in roost abandonment and/or mortality of juvenile bats, if present. However, incorporation of the mitigation measures listed below would minimize the impacts to less than significant.

Mitigation Measures BR-1 and BR-2: Mitigation for Special Status Bats

BR-1: Pre-construction Surveys:

Prior to the onset of construction activity, a California Department of Fish and Wildlife (CDFW)- approved biologist will conduct pre-construction surveys for active roosting, breeding, or hibernacula sites (roosts) in large trees and buildings within the project area. Construction/building demolition will not take place as long as a

roost site is occupied. Therefore, depending on when construction begins, bat surveys should be timed to be prior to the change in season (maternity vs. hibernation) so that special status bats can be correctly excluded without take (see seasons below). If no active bat roosts, breeding, or hibernacula sites are detected, no further action is required.

BR-2: Avoidance & Minimization:

a. If any active bat sites are discovered or if evidence of recent occupation is established, the following measures will be implemented in order to minimize impacts on special status bats:

    1. Construction will be scheduled to minimize impacts upon pallid bats. Type and status of active roosts shall be determined, and bat eviction shall be undertaken in a manner that does not exclude bats during times of inclement weather or exclude females from young still in a roost.

    2. Hibernation sites with evidence of prior occupation will be sealed before the hibernation season (November–March), and nursery sites will be sealed before the nursery season (April– August).

    3. If the site is occupied by the bats, then construction will occur outside the hibernation season (for hibernacula), and after August 15 (for nursery colonies). Construction/building demolition will not take place as long as the roost site is occupied.

    4. If exclusion devices are used, they will be employed based on current best practices and will be regularly monitored by a qualified biologist.

Special Status Birds

Special status avian species have the potential to nest and/or forage at the project site and its vicinity. For instance, species such as Swainson's hawk, white-tailed kite, Lawrence's goldfinch, yellowbilled magpie, Nuttall's woodpecker, and oak titmouse could nest in the trees within and adjacent to the area. Loggerhead shrike could nest in shrubs or trees within and adjacent to the area and forage in the open fields. Additionally, burrowing owls could move into the area prior to construction, and occupy any large burrows during the nesting and wintering seasons.

Since CDFW usually requires a various sized "no disturbance" buffers around nesting sites for these species, construction-related disturbance could be considered take under California Endangered Species Act (CESA) and MBTA. Specific impacts to burrowing owl according to the Staff Report on Burrowing Owl Mitigation (CDFG 1995) include any "disturbance within 50 meters (approx. 160 ft) [75 meters (250 ft) during breeding season] which may result in harassment of owls at occupied burrows; destruction of natural and artificial burrows (culverts, concrete slabs and debris piles that provide shelter to burrowing owls); and destruction and/or degradation of foraging habitat adjacent (within 100 m) of an occupied burrow(s)".

In addition, other migratory birds will likely be nesting in the study area and vicinity, most of which are protected by the Migratory Bird Treaty Act (USCA 1918). Both construction related disturbance and the removal of vegetation within the project area could result in nest abandonment or direct mortality of eggs, chicks, and/or fledglings. This type of impact to migratory birds, including special status bird species, would be considered take under the MBTA and CESA, and therefore, is a potentially significant impact. In order to avoid impacts to avian species, nests and nesting habitat should not be disturbed or destroyed. The following measures will reduce potential impacts to a less than significant level.

Mitigation Measures BR-3 through BR-6: Mitigation for Potential Impacts to Special Status and Nesting Migratory Birds

BR-3: Avoidance:

If feasible, any vegetation removal will take place between September 1 and February 1 to avoid impacts to nesting birds in compliance with the Migratory Bird Treaty Act. If vegetation removal must occur during the nesting season, project construction may be delayed due to actively nesting birds and their required protective buffers.

BR-4: Pre-construction Surveys:

a. If vegetation removal or ground disturbance will commence between February 1 and August 31, a qualified biologist will conduct a pre-construction survey for nesting birds within 10 days of the initiation of disturbance activities. This survey will cover:

    1. Potential nest sites in trees, bushes, or grass within species-specific buffers of the project area (Swainson's hawk – 0.5-mile, other raptor species – 500 ft, non-raptor species – 250 ft).

    2. Survey protocol developed by the Swainson's Hawk Technical Advisory Committee (TAC) should be followed (CDFG 2000), which includes survey timing and requirements for repeated visits.

b. Surveys for burrowing owl will occur within 14 days prior to any ground disturbance, no matter the season. This survey will cover potential burrowing owl burrows in the project area and suitable habitat within 150 m (500 ft). Evaluation of use by owls shall be in accordance with California Department of Fish and Wildlife survey guidelines (CBOC 1993, CDFG 1995, CDFG 2012). Surveys will document if burrowing owls are nesting or using habitat in or directly adjacent to the project area. Survey results will be valid only for the season (breeding (Feb 1-Aug 31) or non-breeding (Sept 1-Jan 31) during which the survey is conducted.

c. If no active nests or burrows are detected during the pre-construction survey, then no further action is required. If an active nest or burrow is detected, then the following minimization measures will be implemented.

BR-5: Minimization/Establish Buffers:

a. Special status bird species (other than burrowing owl) and MBTA-protected species:

    If any active nests are discovered (and if construction will occur during bird breeding season), the U.S. Fish and Wildlife Service (USFWS) and/or CDFW will be contacted to determine protective measures required to avoid take. These measures could include fencing off an area where a nest occurs, or shifting construction work temporally or spatially away from the nesting birds. Biologists are required on site to monitor construction while protected migratory birds are nesting in the project area. If an active nest is found after the completion of the pre-construction surveys and after construction begins, all construction activities will stop until a qualified biologist has evaluated the nest and erected the appropriate buffer around the nest.

b. Burrowing owl:

    If burrowing owls are detected within the survey area, CDFW should be consulted to determine the suitable buffer. These buffers will consider the level of disturbance of the project activity, existing disturbance of the site (vehicle traffic, humans, pets, etc.), and time of year (nesting vs. wintering). If avoidance is not feasible, the City will work with CDFW to determine appropriate mitigation, such as passive exclusion or translocation, and associated mitigation land offset (CDFG 2012).

BR-6: If avoidance is not possible, a qualified biologist will develop appropriate mitigation that will reduce project impacts to sensitive biological resources to a less than significant level. The type and amount of mitigation will depend on the resources impacted, the extent of the impacts, and the quality of habitats to be impacted. Mitigation may include but are not limited to: 1) Compensation for lost habitat in the form of preservation or creation of in-kind habitat protected by conservation easement; 2) Purchase of appropriate credits from an approved mitigation bank or land trust servicing the Fresno County Area; 3) Payment of in-lieu fees.

Level of Significance After Mitigation: Implementation of the proposed measures will avoid or reduce potential species and habitat impacts such that any impacts will be less than significant.

b.-c. No Impact:

There are no riparian or sensitive natural communities within the project area. The proposed project site is not within a National Wetlands Inventory designated wetland or riparian area.

d. Less Than Significant Impact:

The project will not result in impacts that substantially interfere with wildlife movements. The site does not constitute a "movement corridor" for native wildlife that would attract wildlife to move through the site any more than the surrounding lands. The project site is bordered by residential development to the north and west, and a busy street to the east, which restricts access for wildlife.

e.-f. No Impact:

The proposed project site is not located within the boundary of any Habitat Conservation Plan or Natural Conservation Community Plan. Because no significant biological resources were identified as likely to occur within the project site, the proposed project would not conflict with local policies or ordinances protecting biological resources.

5. Cultural Resources

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

Impact Discussion

a.-c. Less Than Significant Impact with Mitigation Incorporated:

The project entails site preparation activities (e.g., excavation and grading) which have the potential to impact historical and/or archeological resources. The project site and surrounding vicinity is highly disturbed, consisting of lands that were previously utilized for agricultural purposes and now containing increasing amounts of urbanized development; these conditions are generally indicative of a low potential to impact sensitive resources. No historical or archaeological resources are evident on the surface of the land.

As part of this Initial Study, a California Historical Resources Information System (CHRIS) records search was conducted through the Southern San Joaquin Valley Information Center (SSJVIC), and a record search of the Native American Heritage Commission (NAHC) Sacred Lands File (SLF) was conducted

The CHRIS records search included review of the National Register of Historic Places, the Historic Property Directory, the California Register of Historic Places, the California Points of Historical Interest, the California Inventory of Historic Resources, and the California State Historic Landmarks. The SSJVIC provided a response letter with the following information:

- According to the information in the SSJVIC's files, there have been no previous cultural resource studies conducted within the project area. There has been one previous cultural resource study conducted within the one-half mile radius, FR-02714.
- There are no recorded resources within the project area, and it is not known if any exist there. There has been one recorded resource within the one-half mile radius, P-10-003930, a historic era railroad.
- There are no recorded cultural resources within the project area or radius that are listed in the National Register of Historic Places, the California Register of Historical Resources, the California Points of Historical Interest, California Inventory of Historic Resources, or the California State Historic Landmarks.
- Because this project area has not been previously studied for cultural resources, the SSJVIC recommended that a qualified professional consultant conduct a field survey of the entire project area prior to any ground disturbance activities. The SSJVIC additionally recommended that any buildings over 45 years old be evaluated for historical significance prior to alteration or demolition, and that the Native American Heritage Commission (NAHC) be contacted for information regarding cultural resources that may not be included in the CHRIS Inventory.

The project will not impact the historic era railroad mentioned in the SSJVIC letter due to its distance from that resource. The project site contains one house which will be demolished, but it was built in 1980 (i.e., it is 41 years old), thus it does not meet the building age threshold recommended by the SSJVIC for historical significance.

The NAHC SLF records search did not identify any known areas of concern in the SLF inventory. As part of its response letter, the NAHC included a list of Native American tribes who may have knowledge of cultural resources in the project area. A Request for Preliminary Comment and AB 52 Notification was sent to the ten tribes identified by the NAHC. No responses were received.

To ensure potential impacts are less than significant, mitigation measures have been included that require pre-construction field survey of the project site and set forth procedures in the event that subsurface resources are discovered during construction.

Mitigation Measures CR-1 and CR-2: Mitigation for Potential Discovery of Cultural Resources

CR-1: Prior to the start of ground disturbing activities, a field survey of the project site shall be conducted by a qualified cultural resources specialist to ascertain whether there are cultural resources on the surface of the project site. If surface resources are encountered and determined by the cultural resources specialist to be potentially significant, the specialist shall make recommendations to the District on mitigation measures to be implemented to protect the discovered resources in accordance with CEQA Guidelines §15064.5 and Public Resources Code §21083.2.

CR-2: If cultural resources are encountered during ground disturbing construction activities, work shall stop in the immediate vicinity of the find and a qualified cultural resources specialist shall be consulted to determine the significance of the resources in accordance with CEQA Guidelines §15064.5. If potentially significant, the specialist shall make recommendations to the District on mitigation measures to be implemented to protect the discovered resources in accordance with CEQA Guidelines §15064.5 and Public Resources Code §21083.2. If cultural remains are encountered during ground disturbing activities, work shall stop in the immediate vicinity of the find and the County Coroner notified in accordance with Health and Safety Code §7050.5 and CEQA Guidelines §15064.5(e). If the remains are determined to be of Native American descent, the procedures and requirements set forth in CEQA Guidelines §15064.5(d) and (e) and Public Resources Code §5097.98 shall be implemented.

Level of Significance After Mitigation: With incorporation of the proposed mitigation measures, the project's potential impact to subsurface cultural resources will be less than significant.

6. Energy Resources

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

This section is based on the Energy Impact Assessment completed by Ambient Air Quality & Noise Consulting, which can be found in Appendix 3 of this Initial Study.

Impact Discussion

a. Less Than Significant Impact:

Implementation of the proposed project would increase electricity, diesel, gasoline, and natural gas consumption associated with construction activities, as well as long-term operational activities. Energy consumption associated with short-term construction and long-term operational activities are discussed in greater detail, as follows:

Construction-Related Energy Consumption

Energy consumption would occur during construction, including fuel use associated with the on-site operation of off-road equipment and vehicles traveling to and from the construction site. Table 1 of Appendix 3 summarizes the levels of energy consumption associated with project construction. As depicted there, the operation of off-road construction equipment would use an annual estimated 33,102 gallons of diesel. On-road vehicles would use an annual estimated of 3,713 gallons of gasoline and 35 gallons of diesel. In total, construction fuel use would equate to approximately 4,999 million British thermal units (MMBTU) per year. Construction equipment use and associated energy consumption would be typical of that commonly associated with the construction of new land uses. Project construction would not be anticipated to require the use of construction equipment that would be less energy efficient than those commonly used for the construction of similar facilities. Furthermore, on-site construction equipment may include alternatively-fueled vehicles (e.g., natural gas) where feasible. Energy use associated with the construction of the proposed project would be temporary and would not be anticipated to result in the need for additional capacity, nor would construction be anticipated to result in increased peak-period demands for electricity. As a result, the construction of the proposed project would not result in an inefficient, wasteful, or unnecessary consumption of energy, and impacts are considered less than significant.

Operational Building-Use Energy Consumption

The proposed project would result in increased electricity and natural gas consumption associated with the long-term operation of the proposed land use. Estimated electricity and natural gas consumption associated with the proposed facilities are summarized in Table 3 of Appendix 3. As depicted there, the project would result in the annual consumption of approximately 397,952 kWh of electricity, 21,212 kWh of water, and 1,456,040 kilo British thermal units (kBTU) of natural gas. In total, the proposed project would consume an annual total of approximately 2,886 MMBTU. The development of increasingly efficient building fixtures would result in increased energy efficiency and energy conservation. The project would be subject to energy conservation requirements in the California Energy Code (Title 24, Part 6, of the California Code of Regulations, California's Energy Efficiency Standards for Residential and Nonresidential Buildings), the California Green Building Standards Code (Title 24, Part 11 of the California Code

of Regulations), and energy policies included in the City of Fresno General Plan (see General Plan policies RC-8). Adherence to applicable regulations and policies would ensure that the project would not result in wasteful and inefficient use of non-renewable resources due to building operation. For this reason, this impact would be considered less than significant.

b. Less Than Significant Impact:

The project would be required to be in full compliance with the California Building Code, including applicable green building standards and building energy efficiency standards. Furthermore, the project would be required to comply with the City of Fresno General Plan energy policies. The energy policies ensure the conservation and preservation of energy resources by increasing the energy efficiency of buildings, appliances, and buildings to the use of alternative forms of energy. The project would not conflict with other goals and policies set forth in the City of Fresno General Plan pertaining to renewable energy and energy efficiency. Therefore, the proposed project would not conflict with state or local plans for renewable energy or energy efficiency, this impact would be considered less than significant.

7. Geology and Soils

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving:				
(i) rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.			✓	
(ii) strong seismic ground shaking?			✓	
(iii) seismic-related ground failure, including liquefaction?			✓	
(iv) landslides?			✓	
b. Result in substantial soil erosion or the loss of topsoil?			✓	
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?			✓	
d. Be located on expansive soil, as defined in Table 18-a-B of the Uniform Building Code			✓	

(1994), creating substantial 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?				✓
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?		✓		

Impact Discussion

a.-d. Less Than Significant Impact:

The following summarizes the findings of the Geotechnical Engineering Investigation with Geologic Hazards Evaluation prepared for the project by Salem Engineering Group, Inc. and included as Appendix 4:

Tectonics and Seismicity

The site is not within a currently established State of California Earthquake Fault Zone for surface fault rupture hazards nor within an Alquist-Priolo Earthquake Fault (Special Studies) Zone. No active faults with the potential for surface fault rupture are known to pass directly beneath the site. The nearest faults to the project site are associated with the Great Valley Fault system located approximately 55 miles west from the site. There are no known active fault traces in the immediate project vicinity.

Landslide

The site vicinity is flat. There are no known landslides at the site, nor is the site in the path of any known or potential landslides.

Erosion and Loss of Topsoil

Development of the proposed project would entail relatively little risk of erosion or loss of topsoil since the project site has a flat topography and is not subject to notable amounts of wind or water erosion. The potential for water- or wind-borne erosion and loss of topsoil would exist during the construction phase of the proposed project, primarily due to clearing, excavation, and grading activities. Once construction is completed, the potential for erosion would be minimal because the ground would be covered by grass-turfed areas, buildings, hard surfaces, and other landscaping. Additionally, General Construction Permit, Order No. 2012-0006-DWQ, issued by the State Water Quality Control Board in 2012, regulates construction projects of one acre or more, including the proposed project. Projects obtain coverage under the permit by developing and implementing the Storm Water Pollution Prevention Plans, which must specify best management practices that a project would employ to minimize pollution of storm water. Best management practices include erosion controls, sediment controls, wind erosion controls, non-storm water management controls, and waste management and controls (i.e., good housekeeping practices).

Hydrocollapse and Subsidence

Collapsible soils typically consist of loose, dry, low-density soils that, when wetted, will experience settlement/consolidation. Based on the results of testing performed on a relatively undisturbed near surface soil sample, when wetted under a load of 2 kips per square foot these soils exhibited approximately 1.5 percent collapse. Based on the results of the testing performed, the near surface soils are identified as having slight collapse potential. Provided the recommendations to support foundations on a uniform layer of engineered fill are followed, the potential for hydrocollapse is not a concern for the proposed construction.

Based on Salem Engineering's review of an online map published by California Water Science Center, the site is not located in an area of recorded subsidence.

Liquefaction

Soil liquefaction is a state of soil particles suspension caused by a complete loss of strength when the effective stress drops to zero. Liquefaction normally occurs under saturated conditions in soils such as sand in which the strength is purely frictional. Primary factors that trigger liquefaction are: moderate to strong ground shaking (seismic source), relatively clean, loose granular soils (primarily poorly graded sands and silty sands), and saturated soil conditions (shallow groundwater).

A seismic hazard, which could cause damage to the proposed development during seismic shaking, is the post-liquefaction settlement of the liquefied sands. According to the State of California, Seismic Hazard Zonation Program, the site is not located within the potential liquefaction zone.

In general, the soils encountered generally consisted of silty sands to depths ranging from 1 to 26.5 feet BSG. The silty sands were underlain by interbedded layers of clayey sand, sandy silt, silty sand, and sandy lean clay to the maximum depth explored of 51.5 feet BSG.

Free groundwater was not encountered within the depth of exploration, 31.5 feet BSG.

A liquefaction/seismic settlement evaluation was performed, and it was determined that loss of bearing and surface manifestations due to liquefaction is not anticipated to be a concern for the subject site.

Lateral Spreading

Lateral spreading is a phenomenon in which soils move laterally during seismic shaking and is often associated with liquefaction. The amount of movement depends on the soil strength, duration and intensity of seismic shaking, topography, and free face geometry.

Due to the lack of groundwater near the surface and relatively flat nature of the site, Salem Engineering judges the likelihood of lateral spreading to be low.

Expansive Soils

Expansive soils experience shrink and swell due to moisture content fluctuations throughout the dry and wet season. If not addressed, the potential for shrinkage and heave would have an impact on foundations and lightly loaded slabs. The potential for damage to slabs-on-grade and foundations supported on expansive soils can be reduced by placing non-expansive fill below the slabs-on-grade.

Based on the granular nature of the near surface soils encountered and our experience in the near site vicinity, the near surface soils are considered to have very low expansion potential (EI = 2). Thus, the potential to damage due to heave of expansive soils is not a concern for the site.

e. No Impact:

The proposed project would not involve the use of septic tanks or alternative wastewater disposal systems. The proposed project site will be incorporated into the City of Fresno and the project will be served by the City of Fresno sewer system.

f. Less Than Significant Impact with Mitigation Incorporated:

While no paleontological resources or unique geological features are evident on the surface of the land, undiscovered subsurface paleontological resources could nevertheless be present. The following mitigation measure addresses the potential discovery of subsurface resources.

Mitigation Measure GEO-1: Subsurface Paleontological Resources

In the event that unique paleontological resources are discovered during excavation and/or construction activities, construction shall stop in the immediate vicinity of the find and a qualified paleontologist shall be consulted to determine whether the resource requires further study. The qualified paleontologist shall make recommendations to the District on the measures that shall be implemented to protect the discovered resources, including but not limited to, excavation of the finds and evaluation of the finds. If the resources are

determined to be significant, mitigation measures shall be identified by the monitor and recommended to the Lead Agency. No further grading shall occur in the area of the discovery until the Lead Agency approves the measures to protect these resources. Any paleontological resources recovered as a result of mitigation shall be provided to an appropriate institution or person who is capable of providing long-term preservation to allow future scientific study.

Level of Significance After Mitigation: With incorporation of the proposed mitigation measure, the project's potential impact to unique paleontological resources will be less than significant.

8. Greenhouse Gas Emissions

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

This section is based on the Air Quality & Greenhouse Gas Impact Assessment completed by Ambient Air Quality & Noise Consulting, which can be found in Appendix 1.

Impact Discussion

a. Less Than Significant Impact:

Implementation of the proposed project would contribute to increases of GHG emissions that are associated with global climate change. To evaluate the potential significance of the project's GHG generation, the Air Quality & Greenhouse Gas Impact Assessment (Initial Study Appendix 1) utilizes a GHG efficiency threshold based on the project's service population, which is calculated by dividing the GHG emissions inventory goal (allowable emissions) by the estimated service population of the individual project. To be conservative, amortized construction-generated GHG emissions were included in the annual operational GHG emissions estimates. Project-generated GHG emissions that would exceed the efficiency threshold of 2.8 MTCO2e per service population (MTCO2e/SP/year) in year 2030 would be considered to have a potentially significant impact on the environment that could conflict with GHG-reduction planning efforts. (See pages 37-38 of Appendix 1 for more detailed discussion regarding GHG efficiency threshold calculations.)

Estimated GHG emissions attributable to future development would be primarily associated with increases in CO_2 from mobile sources. To a lesser extent, other GHG pollutants, such as CH_4 and N_2O, would also be generated. Short-term and long-term GHG emissions associated with the development of the proposed project are discussed in greater detail, as follows:

Short-term Emissions

Estimated increases in GHG emissions associated with the construction of the proposed project are summarized in Table GHG-3 of Appendix 1. Based on the modeling conducted, construction-related GHG emissions would total approximately 579.6 MTCO2e. Amortized GHG emissions, when averaged over the conservative assumption of a 25-year project life would total approximately 23.2 MTCO2e/year. Actual emissions may vary, depending on the final

construction schedules, equipment required, and activities conducted. Amortized construction-generated GHG emissions are included in the operational GHG emissions impact discussion provided in Table GHG-3 of Appendix 1.

Long-term Emissions

Estimated long-term increases in GHG emissions associated with the proposed project are summarized in Table GHG-4 of Appendix 1. As depicted there, operational GHG emissions for the proposed project, with the inclusion of amortized construction GHGs, would total approximately 1,232.9 MTCO2e/year. A majority of the operational GHG emissions would be associated with energy use and the operation of motor vehicles. Project-generated GHG emissions are projected to decrease in future years due largely to improvements in energy efficiency and vehicle fleet emissions. Based on the modeling conducted an estimated 745 SP (i.e., 700 students and 45 employees) was used to calculate the GHG efficiency. The calculated GHG efficiency for the proposed project, without mitigation, would be approximately 1.7 MTCO2e/SP/yr. The GHG efficiency for the proposed project would not exceed the threshold of 2.8 MTCO2e/SP/yr. For these reasons, this impact would be considered less than significant.

b. Less Than Significant Impact:

As noted in Section 8(a) above, the proposed project would not result in increased GHG emissions that would conflict with the State's GHG-reduction target goals. The proposed project would be designed to meet current building energy-efficiency standards, which include measures to reduce overall energy use, water use, and waste generation. In addition, based on the traffic analysis prepared for this project, the existing average vehicle miles traveled (VMT) to existing schools is 3.4 miles (round-trip). Upon completion of the proposed project, the average VMT is projected to be 2.4 miles (round-trip). Therefore, implementation of the proposed project is anticipated to result in an overall reduction in VMT and associated GHG emissions due to student-related trips. For these reasons, the proposed project would not conflict with local, regional, or state GHG-reduction planning efforts. This impact would be considered less than significant.

9. Hazards and Hazardous Materials

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			✓	
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 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?				✓
h. Satisfy requirements for evaluating the safety of potential school sites as set forth in CEQA Guidelines Section 15186, Public Resources Code Section 21151.8, Education Code Section 17213, and California Code of Regulations, Title 5, Section 14011[h]?			✓	

Impact Discussion

a.-c. Less Than Significant Impact:

Construction of the project would involve the transport and use of fuels, lubricants, greases, solvents, architectural coatings including paints. Operation of the project would involve hazardous materials used for cleaning and maintenance purposes: cleansers, solvents, paints, pesticides, and fertilizers.

The project itself entails construction of an elementary school campus. No other existing or proposed schools are located within one-quarter mile of the project site.

The school would be subject to state and local regulations governing the routine transport, use, and disposal of hazardous materials and the release of hazardous materials into the environment. In addition, the California Education Code requires that the school site undergo an environmental review process overseen by the California Department of Toxic Substances Control (DTSC). The purpose of the process is to determine if a release or threatened release of any hazardous materials found on the proposed site or presence of any naturally occurring hazardous materials on the site present a risk to human health or the environment. A Preliminary Environmental Assessment (PEA) Report was prepared for the site by Krazan & Associates (September 23, 2022). Based on site testing, constituents of potential concern were not present at a level that would warrant additional action.

Given the characteristics of the project along with the regulations and oversight processes in place to prevent and/or reduce potential impacts, this impact is less than significant.

d. No Impact:

No hazardous materials sites were identified within a one-half mile of the proposed project site through California Department of Toxic Substances Control's EnviroStor or State Water Resources Control Board's GeoTracker interactive web maps.

e. No Impact:

The project site is not within two nautical miles of a public or private airport and is not within an area subject to an airport land use plan.

f. No Impact:

All schools have emergency response/evacuation plans. Research conducted for this Initial Study did not identify any adopted emergency response plans or emergency evacuation plans the project could impair.

g. No Impact:

The project site is adjacent to an urban area and not within an area subject to high wildland fire risk (CalFire 2007). (See Section 20 for additional information on wildfire risk.)

h. Less than Significant Impact:

CEQA Guidelines section 15186, Public Resources Code section 21151.8, Education Code Section 17213, and California Code of Regulations, Title 5, Section 14011[h], establish requirements for evaluating the safety of potential school sites. The purpose of the requirements is to ensure that potential health hazards resulting from exposure to any hazardous materials, wastes, and substances that may exist on a site will be carefully examined and disclosed in a negative declaration or EIR, and that the lead agency will consult with other agencies in this regard. The following concerns must be addressed:

- Is the proposed school site the site of a current or former hazardous waste or solid waste disposal facility and, if so, have the wastes have been removed?
- Is the proposed school site a hazardous substance release site identified by the Department of Toxic Substances Control in a current list adopted pursuant to Section 25356 of the Health and Safety Code for removal or remedial action pursuant to Chapter 6.8 (commencing with Section 25300) of Division 20 of the Health and Safety Code?
- Is the proposed school site the site of one or more buried or above ground pipelines that carry hazardous substances, acutely hazardous materials, or hazardous wastes, as defined in Division 20 of the Health and Safety Code? (This does not include a natural gas pipeline used only to supply the school or neighborhood.)
- Is the proposed school site within 500 feet of the edge of the closest traffic lane of a freeway or other busy traffic corridor?

In addition to addressing the preceding questions, the District must determine if any permitted or nonpermitted facilities, including but not limited to freeways and busy traffic corridors, large agricultural operations, and rail yards, are within one-quarter mile of the proposed school site that might reasonably be anticipated to emit hazardous emissions or handle hazardous or acutely hazardous material, substances, or waste.

As part of the planning and development process for the proposed school site, a preliminary report was prepared by Krazan and Associates, Inc. (Krazan) to the current conditions at the subject site and addresses potential environmental hazards related to infrastructure improvements in the vicinity of the proposed elementary school campus. The scope of work included conducting surveys for toxic air emitters, hazardous pipelines, aboveground storage tanks, electrical power lines, and railroad tracks in the vicinity of the site as required by applicable sections of the California Education Code. The findings presented in the report indicate that there are no hazardous pipelines within 1,500 feet of the project site, no aboveground fuel or water storage tanks within one-quarter mile of the project site, and no high-voltage (greater than 50 kV) electrical power lines within 350 feet of the project site. The report identified the presence of the railroad track owned by the San Joaquin Valley Railroad and noted that since the railroad track lies within 1,500 feet of the project site a safety study must be performed by a competent professional in accordance with California Education Code requirements.

To evaluate potential risks associated with the San Joaquin Valley Railroad (SJVR) line located north of the project site, a Railroad Safety Assessment was prepared by ToxRisk Consulting, LLC. The analysis estimates the likelihood of a serious hazardous materials railroad incident that could occur within 1,500 feet of the subject site. The likelihood of a railroad incident was estimated based on the following six criteria: railroad alignment; use characteristics; engineering design and safety controls; regulatory agency records of past incidents; probability of a hazardous materials release; and the availability of appropriate risk management and emergency response plans. Based upon

the results of this qualitative risk analysis, the report concluded that the relative risk of a serious railroad hazardous material accident within the study area that affects the proposed school site is negligible (fewer than 1 accident every 10,000 years).

Regarding toxic air emitters, Krazan requested information from the San Joaquin Valley Air Pollution Control District (SJVAPCD) identifying any emitters of toxic air in the vicinity of the project site; in response to that request, SJVAPCD found no sources of emissions within one-quarter mile. Krazan also conducted a reconnaissance of the area and noted that the subject site was surrounded by single family residential, agricultural, and vacant properties within a one-quarter mile radius of the subject site. No suspected permitted industrial or commercial emitters were identified; therefore, the report indicated that toxic air emitters should not be a potential hazard with respect to the planned elementary school facility.

The proposed site is not located at the site of a current or former hazardous waste or solid waste disposal facility. Based upon information provided in the preliminary report prepared by Krazan as well as review of hazardous materials-related databases, there are no facilities that might reasonably be anticipated to emit hazardous air emissions, or to handle hazardous or extremely hazardous materials, substances, or waste within one-quarter mile of the school site.

Regarding traffic conditions (which are not evaluated as part of the PEA or the Krazan report), based on review of transportation system maps and aerial imagery, the project site is not within 500 feet of the edge of the closest traffic lane of a freeway or other busy traffic corridor. The site is adjacent to Temperance Avenue, which is designated as a super arterial in the City of Fresno General Plan, but it does not meet the definition of a busy traffic corridor. Per Education Code Section 17213(d)(9) "Freeway or other busy traffic corridors" means those roadways that, on an average day, have traffic in excess of 50,000 vehicles in a rural area as defined in Section 50101 of the Health and Safety Code, and 100,000 vehicles in an urban area, as defined in Section 50104.7 of the Health and Safety Code.

Based on the information presented above, the project's impacts related to safety requirements for potential school sites are less than significant.

10. Hydrology and Water Quality

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?			✓	
b. Substantially deplete 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 that would:				
(i) result in a 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 off-site?			✓	
(iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional resources of polluted runoff; or			✓	
(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?			✓	

Impact Discussion

a. Less Than Significant Impact:

The City of Fresno's water and wastewater systems will serve the proposed project. These systems are subject to, and operate in compliance with, applicable water quality standards and waste discharge requirements. The design and operational characteristics of the project related to water and wastewater would not directly or incrementally cause these systems to violate the applicable requirements.

In compliance with Fresno County Health Department requirements, all water wells (not intended for use) and septic systems within the property will be properly destroyed by an appropriately licensed contractor to avoid impacts to groundwater.

Potential impacts on water quality from erosion and sedimentation could temporarily occur during construction. Before beginning construction, the District must prepare a Stormwater Pollution Prevention Plan (SWPPP). The SWPPP is a site-specific plan that is designed to control the discharge of pollutants from the construction site to local storm drains and waterways. The SWPPP would include site-specific BMPs to minimize erosion on-site and reduce or otherwise prevent conditions of erosion and stormwater runoff.

b. Less Than Significant Impact:

The project site lies within the Kings Groundwater Subbasin, a hydrologic region that includes portions of Fresno, Tulare and Kings Counties and is part of the larger San Joaquin Valley Groundwater Basin. The Kings Subbasin is critically overdrafted. (Refer to discussion under Section 10(e) for additional information)

The proposed project would use water for construction, domestic, and landscape irrigation purposes. A typical school uses approximately 3 acre-feet of water per acre (af/acre) for domestic uses and 4 af/acre for landscape irrigation (Tully & Young, 2007), so the projected water demand would be approximately 3 af/year for domestic uses and 20 af/year for landscape irrigation. The project would partially offset domestic demand at other school sites since the project's enrollment population would partially consist of existing students currently housed at other schools in the area.

The project would receive water service from the City of Fresno, which obtains its water supply from a combination of groundwater, surface water entitlements, and recycled water. While historically the City of Fresno relied entirely on groundwater for its water supply, according to the City's 2020 Urban Water Management Plan, it will have transitioned to a supply comprised of about 42-45 percent groundwater, 54-56 percent surface water, and 1.5-2 percent recycled water in Years 2020 through 2045 (see pages ES-4 through ES-7 of the City of Fresno 2020 UMWP).

The water demand for the project is not expected to exceed the level of demand associated with the site's planned land uses that are reflected in the City of Fresno's General Plan and its 2020 Urban Water Management Plan. The demand for water at the project site would be comparable to that of residential uses allowed in planned urban residential areas. Further, the project's potential impact specifically to groundwater supplies would be lessened because the City has adopted policies and developed facilities to increase utilization of surface water and recycled water while reducing or holding constant its use of groundwater to meet future water demands within the City's service area.

Regarding groundwater recharge, the project will increase impervious surfaces in the project area. However, the amount of impermeable surfaces added from buildout of the project would be similar to if not less than what would occur from development anticipated as part of the long-range land use planning for the project site and its vicinity.

c. Less Than Significant Impact:

No streams or rivers exist on or near the project site. The project site is generally flat and will be covered with buildings, hardscape, and landscaping, which will not result in erosion.

The addition of new impervious surfaces that would occur from development of the project (e.g., hardscape, building pads, parking lots, streets, driveways) will increase stormwater runoff in comparison to existing conditions. However, this is consistent with the type of urbanized development that has been planned for the area and would not result in a significant unplanned change in conditions related to management of stormwater runoff.

Based on this information, including compliance with applicable FMFCD requirements pertaining to drainage and stormwater runoff, the impacts of the project would be less than significant (see also Section 19, Utilities and Service Systems).

d. Less Than Significant Impact:

The following summarizes the findings of the Geotechnical Engineering Investigation with Geologic Hazards Evaluation prepared for the project by Salem Engineering Group, Inc. and included as Appendix 4:

Based on FEMA Flood Insurance Rate Map No. 06019C2135H dated February 18, 2009, the subject site area is partially labeled other flood areas Zone X, which is an of minimal flood hazard (Figure 6 of Appendix 4).

The site is not located within a coastal area. Therefore, tsunamis (seismic sea waves) are not considered a significant hazard at the site. Seiches are large waves generated in enclosed bodies of water in response to ground shaking. No major water-retaining structures are located immediately up gradient from the project site. Flooding from a seismically-induced seiche is considered unlikely.

The project site is not within a flood hazard, tsunami, or seiche zone, therefore, the project is not at risk of releasing pollutants due to project inundation.

e. Less Than Significant Impact:

The proposed project site is located within the Kings Subbasin of the San Joaquin Valley Basin. The Kings Subbasin is located in the southern part of the San Joaquin Valley with the majority of surface water being supplied from the Kings and San Joaquin Rivers. Through its various surface water resources and several decades of proactive groundwater recharge activities, this portion of the Kings Subbasin has not experienced significant overdraft conditions experienced elsewhere in the subbasin. Drought and other challenges, however, have contributed to a gradual decline in overall groundwater conditions that will be addressed through the implementation of the Groundwater Sustainability Plan for the North Kings region.

The Sustainable Groundwater Management Act of 2014 (SGMA) requires the formation of local Groundwater Sustainability Agencies (GSAs) that are responsible for developing Groundwater Sustainability Plans (GSPs). The proposed project site is located within jurisdiction of the North Kings Groundwater Sustainability Agency ("North Kings GSA"), and both the City of Fresno and the County of Fresno are member agencies in the GSA. The North Kings GSA developed a Groundwater Sustainability Plan was developed in compliance with the California Department of Water Resources' Groundwater Sustainability Plan Emergency Regulations and developed pursuant to Water Code

Section 10733.2. The regulations describe the components of groundwater sustainability plans, intra-basin coordination agreements, and the methods and criteria to be used by Department of Water Resources to evaluate those plans and coordination agreements.

As discussed above in Section 6.10(b), development and operation of the project is not expected to adversely affect groundwater supplies or recharge, and the project's demand for water would not cause a substantial adverse effect on sustainable yields. As such, the project would not conflict with or obstruct the North Kings GSP. No other potential conflicts pertaining to water quality planning and/or groundwater management have been identified as part of the environmental review process.

11. Land Use and Planning

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

Impact Discussion

a.-b. No Impact:

The proposed project is located immediately adjacent to the City of Fresno city limits and is in an area that has been undergoing development with new urban uses, particularly single-family residential development. As there is no existing urban development to the east and south, the proposed project would not physically divide an established community. Additionally, schools are usually located in residential neighborhoods and often serve as unifying elements for the neighborhoods.

Public schools are a permitted use within the City of Fresno's Residential Single-Family Districts and are permitted subject to review and approval within Fresno County's Limited Agricultural ("AL") Districts. The proposed facilities and operational activities included as part of the project are consistent with land use plans, policies, and regulations adopted for the project area. Further, this Initial Study demonstrates that all potential impacts of the project are either less than significant or can be mitigated to a less than significant impact.

12. Mineral Resources

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?				✓

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?				✓

Impact Discussion

a.-b. No Impact:

The project would not result in the loss of availability of a known mineral resource or locally important mineral recovery site because no known resources exist on or near the proposed school site. (Fresno County General Plan Background Report [2000] and City of Fresno General Plan MEIR [2014])

13. Noise

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

This section is based on the Noise & Groundborne Vibration Impact Assessment completed by Ambient Air Quality & Noise Consulting, which included as Appendix 5 of this Initial Study.

Impact Discussion

a. Less Than Significant Impact with Mitigation Incorporated:

Noise generated by the proposed project would include noise from short-term construction activities plus a variety of sources occurring during the long-term operation of the project. Noise-related impacts associated with short-term construction and long-term operations of the proposed project are discussed separately, as follows:

Short-Term Construction Noise Levels

Construction noise typically occurs intermittently and varies depending upon the phase (e.g., land clearing, grading, excavation, and erection). Noise generated by construction equipment, including earthmovers, material handlers, and portable generators, can reach high levels. Instantaneous noise levels generated by individual pieces of off-road construction equipment typically range from approximately 77 to 90 dBA Lmax at 50 feet (refer to Table 8 of Appendix 5 for noise levels associated with specific types of equipment). Typical operating cycles may involve 2

minutes of full power, followed by 3 or 4 minutes at lower settings. Based on typical off-road equipment usage rates, average hourly noise levels for individual equipment would be approximately 83 dBA Leq, or less, at 50 feet. Assuming that multiple pieces of equipment could be operating simultaneously, predicted average-hourly noise levels could reach levels of approximately 85 dBA at 50 feet.

The nearest noise-sensitive land uses located in the vicinity of the proposed project site include residential dwellings, which are located adjacent to the northern, southern, and western property boundaries. Assuming that construction activities were to occur near the project site boundary, predicted exterior noise levels would be approximately 85 dBA Leq at the outdoor activity areas of the nearest residential dwellings. Based on this exterior noise level and assuming an average exterior-to-interior noise reduction of 15 dB, with windows partially open, predicted interior noise levels at the residential dwellings could reach levels of approximately 70 dBA Leq. As previously noted, construction noise levels that occur between 7:00 a.m. and 9:00 p.m. are exempt from the City of Fresno and County of Fresno noise-control regulations. With regards to residential land uses, activities occurring during the more noise-sensitive nighttime hours are of particular concern given the potential for sleep disruption and increased levels of annoyance for building occupants. For these reasons, this impact would be considered potentially significant.

Mitigation Measure N-1: Construction Noise Mitigation

The following measures shall be implemented to reduce construction-generated noise levels:

a. Noise-generating construction activities, including equipment maintenance, shall be limited to the hours between 7:00 a.m. and 9:00 p.m. Noise-generating construction activities shall be prohibited on weekends and national holidays.

b. Stationary construction equipment that generates noise that exceeds 65 dBA at the project boundaries shall be shielded with a barrier that meets a sound transmission class rating of 25.

c. All diesel equipment shall be operated with closed engine doors and shall be equipped with factory-recommended mufflers.

d. Whenever feasible, electrical power shall be used to run air compressors and similar power tools.

e. Construction staging areas shall be located at the furthest distance possible from nearby residential land uses.

Level of Significance After Mitigation: Implementation of the above mitigation measures would limit construction activities to less noise-sensitive periods of the day. The use of mufflers would reduce construction equipment noise levels by approximately 10 dBA. With the implementation of the above mitigation measures and given that construction activities would be short-term and intermittent, this impact would be considered less than significant.

Long-Term Operational Noise Levels

Long-term, permanent increases in ambient noise levels would be primarily associated with potential increases in vehicle traffic on nearby roadways, as well as on-site activities. Noise levels commonly associated with these sources and potential impacts to nearby noise-sensitive land uses would be primarily limited to the daytime school operational hours and are discussed as follows:

Vehicular Roadway Traffic

Predicted existing traffic noise levels, with and without the implementation of the proposed project, are summarized in Table 9 of Appendix 5. In comparison to existing without project traffic noise levels, the proposed project would result in a predicted increase in traffic noise levels of 1.0 dBA along nearby roadways.

Predicted future cumulative traffic noise levels, with and without the implementation of the proposed project, are summarized in Table 10 of Appendix 5. In comparison to future cumulative without project traffic noise levels, the proposed project would result in a predicted increase in traffic noise levels of 0.2 to 0.3 dBA along nearby roadways.

As noted in Appendix 5, a change in sound level of at least 5 dB is required before any noticeable change in community response would be expected. Implementation of the proposed project would not result in substantial increases (i.e., 5 dBA or greater) in existing and future cumulative conditions along nearby roadways. Predicted traffic noise levels are not projected to exceed the City's exterior and interior noise standards at the nearby residential land use (refer to Appendix B of Appendix 5). As a result, this impact would be considered less than significant.

Vehicle Parking Lot

The proposed project may include the construction of a 149-space parking lot generally located within the southwestern portion of the project site (refer to Figure 3 of Appendix 5). Use of the parking lot would primarily occur during the daytime hours of operation.

The nearest noise-sensitive land use located within the City of Fresno jurisdiction is located adjacent to and west of the project site, approximately 75 feet, or more, from onsite vehicle parking areas. The nearest noise-sensitive land use located within the County of Fresno is located south of the project site, approximately 82 feet, or more, from onsite vehicle parking areas. Based on a conservative assumption that all parking spaces would be accessed over a one-hour period, predicted exterior noise levels at these nearest residential land uses would be approximately 46 dBA Leq/L50, or less. Predicted noise levels associated with on-site parking lot activities would not exceed the exterior daytime noise standard of 50 dBA Leq/L50. As a result, this impact would be considered less than significant.

Building Maintenance & Mechanical Equipment

Proposed structures would be anticipated to include the use of building mechanical equipment, such as air conditioning units and exhaust fans. Building mechanical equipment is proposed to be located on the rooftop of permanent buildings and wall-mounted on modular buildings. Use of building mechanical equipment would primarily occur during the daytime hours of operation.

Exterior air conditioning units and exhaust fans can generate noise levels up to approximately 65 dBA Leq at 10 feet. The nearest noise-sensitive land use located within the City of Fresno jurisdiction is located adjacent to and north of the project site, approximately 40 feet from proposed onsite buildings. Assuming an operational noise level 65 dBA Leq and that exterior air conditioning units were located within line-of-sight of the nearest residential land use, predicted noise levels at the property line of this nearest residence would be approximately 53 dBA Leq/L50. Predicted noise levels at this nearest residence would exceed the daytime exterior noise standard of 50 dBA Leq/L50.

The nearest noise-sensitive land use located within the County of Fresno is located south of the project site, approximately 230 feet from the nearest proposed onsite building. Based on the same assumptions noted above, predicted exterior noise levels at the property line of this nearest residence would be approximately 44 dBA Leq/L50. Predicted noise levels at this nearest residence would not exceed the daytime exterior noise standard of 50 dBA Leq/L50.

Predicted operational noise levels at the property line of residential land uses located within 100 feet of proposed onsite buildings could potentially exceed the daytime exterior noise standard of 50 dBA Leq/L50. As a result, this impact would be considered potentially significant.

Recreational Facilities

The proposed project includes the construction of outdoor recreational-use facilities, including playgrounds, ball courts, and ball fields. Noise generated by outdoor recreational uses typically includes elevated children's voices, occasional adult voices and the sounding of whistles. Use of outdoor recreational facilities would primarily occur during the daytime hours of operation.

Based on measurement data obtained from similar land uses, noise levels associated with onsite recreational facilities would generate noise levels of approximately 50-60 dBA Leq at 50 feet from source center. The nearest noise-sensitive land uses located within the City of Fresno jurisdiction are located adjacent to and north of the project site, approximately 35 feet north of the nearest onsite basketball courts. A residential land use is also located approximately 180 feet east of the proposed volleyball courts. The nearest noise-sensitive land uses located within

the County of Fresno are located south of the project site, approximately 125 feet from onsite ball fields. Based on these distances and assuming a source noise level of 60 dBA Leq at 50 feet from source center, predicted exterior noise levels at the property line of the nearest residential land uses to the north of the proposed basketball courts, would be approximately 54 dBA Leq/L50. Predicted noise levels at the outdoor facilities of the residential land use to the east of the proposed volleyball courts would be 49 dBA Leq/L50. Predicted noise levels at the property line of the nearest residential land uses to the south of the project site would be approximately 48 dBA Leq/L50. Predicted noise levels at the property line of the nearest residential land uses to the south of the project site would be approximately 48 dBA Leq/L50.

Predicted noise levels associated with the proposed onsite recreational facilities would exceed the daytime exterior noise standard of 50 dBA Leq/L50 at the property lines of the nearest residential land uses located to the north of the proposed ball courts. Predicted noise levels with other onsite recreational land uses, including proposed ball fields, would not exceed the daytime exterior noise standard of 50 dBA Leq/L50 at the nearest residential land uses. Noise generated by recreational facilities would be considered to have a potentially significant impact.

In order to address potentially significant impacts from operational noise, the following mitigation measures will be implemented as part of the project:

Mitigation Measure N-2: Operational Noise Mitigation

a. Exterior air conditioning units for buildings to be located within 100 feet of residential property lines shall be located on roof-top areas and/or shielded from direct line-of-sight of adjacent residences.

b. A noise barrier shall be constructed along the southern property line of the nearest residential land uses located to the north of the proposed ball courts. The sound barrier shall be constructed to a minimum height of 5 feet above ground level with no visible air gaps between construction components or at the base of the structure. The barrier shall be constructed of wood, metal, or concrete block having a minimum total density of 4 pounds/square foot. (The noise barrier location is depicted on Page 46 of this Initial Study.)

Level of Significance After Mitigation: Placing air conditioning units on rooftop areas or shielded from direct line-of-sight of nearby residences would reduce operational noise levels by approximately 5 dBA, or more. The construction of a noise barrier would reduce noise associated with nearby recreational facilities by approximately 5 dBA. It is also important to note that school-related activities, including the use of outdoor recreational facilities, are typically considered exempt from the City's noise ordinance requirements. With the implementation of the above mitigation measures, this impact would be considered less than significant.

(Figure 5 from the Noise & Groundborne Vibration Impact Assessment, which displays the location of the noise barrier, is reproduced for reference on the following page.)

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Figure 5. Proposed Noise Barrier Location

Land Use Compatibility

The City of Fresno General Plan Noise Element includes noise standards for the determination of land use compatibility for new land uses. As previously discussed, the City's "normally acceptable" exterior noise standards for schools is 65 dBA CNEL/Ldn.

As noted in Appendix 5, ambient noise levels in the project area are largely influenced by traffic noise on area roadways. Under future cumulative conditions, with project-generated vehicle traffic included, the predicted 65 dBA CNEL/Ldn noise contour for Temperance Avenue would be within the roadway right of way. Based on preliminary site plans, the nearest proposed building would be located approximately 680 feet from the centerline of Temperance Avenue. Based on this setback distance, predicted exterior traffic noise levels at the nearest building façade would be 44 dBA CNEL/Ldn. With compliance with current building insulation standards, average exterior-to-interior noise reductions for newly constructed buildings typically range from approximately 25-30 dB. Assuming an exterior noise level of 44 dBA CNEL/Ldn and a minimum exterior-to-interior noise reduction of 25 dB, predicted interior noise levels within the proposed building would be approximately 19 dBA CNEL/Ldn, or less. Predicted exterior noise levels at outdoor activity areas would be approximately 60 dBA CNEL/Ldn, or less. Predicted exterior and interior noise levels would not exceed the City's applicable land use compatibility noise standards. As a result, this impact would be considered less than significant.

b. Less Than Significant Impact:

Increases in groundborne vibration levels attributable to the proposed project would be primarily associated with short-term construction activities. Groundborne vibration levels associated with representative construction equipment likely to be required during project construction are summarized in Table 11 of Appendix 5. As depicted, construction-generated vibration levels would range from approximately 0.003 to 0.210 in/sec ppv at 25 feet. The highest vibration levels would be associated with the use of vibratory rollers.

The nearest existing structures include residential dwellings, which are located approximately 30 feet from the northern and western property boundaries. Predicted groundborne vibration levels at these nearby structures would be approximately 0.17 in/sec ppv. Predicted vibration levels would not exceed the minimum recommended criteria for structural damage or human annoyance (0.5 in/sec ppv and 0.2 in/sec ppv, respectively). As a result, this impact would be considered less than significant.

c. Less Than Significant Impact:

The nearest airport is the Fresno Yosemite International Airport, which is located approximately 3.7 miles northwest of the project site. The proposed project is not located within the predicted noise contour zones of the airport. As a result, the proposed project would not subject on-site employees or students to potentially hazardous noise conditions associated with aircraft operations, nor would the implementation of the proposed project affect airport operations. As a result, this impact would be considered less than significant.

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14. Population and Housing

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

Impact Discussion

a. No Impact:

The proposed elementary school project would not induce substantial unplanned growth, either directly or indirectly. As discussed elsewhere in this report, the project is located in an area that has been specifically planned by the City of Fresno to accommodate future population growth, and the area is currently experiencing new development and population growth. Similarly, Sanger Unified is proposing the project in response to the existing and planned residential development within southeast Fresno. No aspects of the project's location, design, or operational features have been identified as having potential to cause a substantial effect on population growth that would differ from the growth planning set forth in the City of Fresno General Plan. For these reasons, this impact would be less than significant.

b. Less Than Significant Impact:

The project will not displace a substantial number of existing people or housing. The project site contains one house which will be demolished, but this will not necessitate the construction of replacement housing elsewhere.

15. Public Services

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

(ii) Police Protection?			✓	
(iii) Schools?			✓	
(iv) Parks?			✓	
(v) Other public facilities?			✓	

Impact Discussion

a. Less Than Significant Impact:

The project would not result in the need for new or physically altered fire protection, police protection, parks, other public facilities in order to maintain acceptable service ratios, response times or other performance objectives. The project is located adjacent to an urban area that is well-served by public services. The proposed project site is located approximately 3.4 miles from the nearest existing Fresno Fire and Police Stations. The project would not adversely affect park facilities, as noted in Section 16(a). The physical and operational characteristics of the elementary school campus would be consistent with already-existing and future-planned development in the area. In response to a preliminary request for comments that was distributed to agencies providing public services to the project, no responses indicative of potentially significant impacts were received.

16. Recreation

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

Impact Discussion

a. No Impact:

Currently, there are very limited amounts of park and recreational space in the project site vicinity. The nearest existing recreational facilities to the project site are Al Radka Park (approximately 2.5 miles northwest of the project) and two small linear park areas that are part of residential subdivisions (approximately one mile west of the project). Given the distance of the project site from these areas, the project would not result in a substantial increase in the use of existing parks or recreational facilities. Further, the proposed project would include new recreational facilities to serve students at the campus, which the District could make available to the community for recreational and other uses, alleviating potential demand placed on existing facilities.

b. Less Than Significant Impact:

The project would include construction of recreational facilities for outdoor play and physical education purposes. This Initial Study addresses impacts associated with the development of the facilities as part of the evaluation of

impacts. The Noise section includes consideration of impacts associated with playground and recreational noise, and the Aesthetics section includes consideration of impacts associated with field lighting. Based on the analysis in this Initial Study, and with implementation of recommended mitigation measures, no aspects of the recreational facilities would result in significant environmental impacts. Further, the project would not require construction or expansion of recreational facilities elsewhere. Therefore, this impact is considered less than significant.

17. Transportation

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?		✓		
b. 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?			✓	

Impact Discussion

a. Less Than Significant Impact with Mitigation Incorporated:

The following discussion addresses potential impacts regarding roadway and vehicular transportation as well as bicycle, pedestrian, and transit facilities. The discussion of traffic impacts primarily reflects information in the Traffic Impact Analysis (TIA) prepared for the project by JLB Traffic Engineering, Inc. (included as Appendix 6 of this Initial Study). The project's potential traffic impacts were evaluated in accordance with the standards set forth by the Level of Service (LOS) policies of the City of Fresno, Fresno County and Caltrans, and the City of Fresno policy on VMT.

Existing Transportation Conditions

Roadway Network

Following are descriptions of existing roadways in the vicinity of the project site:

- *Temperance Avenue* is an existing north-south two-lane undivided expressway adjacent to the proposed project. The City of Fresno General Plan Circulation Element designates Temperance Avenue as six-lane super arterial between the City of Clovis SOI and Jensen Avenue, a four-lane super arterial between Jensen Avenue and North Avenue, and a two-lane local roadway south of North Avenue through the City of Fresno SOI.
- *Hamilton Avenue* is an existing east-west two-lane collector in the vicinity of the proposed project. In this area, Hamilton Avenue exists as a two-lane collector divided by a two-way left-turn lane between Fowler Avenue and Temperance Avenue. The Fresno General Plan Circulation Element designates Hamilton Avenue as a two-lane collector between Fowler Avenue and Temperance Avenue.

- *Armstrong Avenue* is an existing north-south two-lane undivided collector in the vicinity of the proposed project. The City of Fresno General Plan Circulation Element designates Armstrong Avenue as two-lane collector between the City of Clovis SOI and Belmont Avenue, a four-lane collector between Kings Canyon Road and Jensen Avenue, and a two-lane collector between Jensen Avenue and North Avenue.
- *California Avenue* is an existing east-west four-lane collector in the vicinity of the proposed project. In this area, California Avenue exists between Armstrong Avenue and approximately 100 feet west of Temperance Avenue. The City of Fresno General Plan Circulation Element designates California Avenue as a four-lane collector between Fowler Avenue and Temperance Avenue.
- *Pitt Avenue* is an existing east-west two-lane local street in the vicinity of the proposed project. In this area, Pitt Avenue exists between Armstrong Avenue and Apricot Avenue and will serve as the principal access to the proposed Project from Armstrong Avenue given the direct access. The City of Fresno General Plan Circulation Element designates Pitt Avenue as a two-lane local street between Armstrong Avenue and Apricot Avenue.
- *Truman Avenue* is an existing east-west two-lane local street adjacent to the proposed project. In this area, Truman Avenue exists between Armstrong Avenue and Apricot Avenue and will serve as the secondary access to the project from Armstrong Avenue given its bends and traffic calming measures. The project also proposes to construct Truman Avenue as a local two-lane local roadway adjacent to the project site between Temperance Avenue and McKelvey Avenue. The City of Fresno General Plan Circulation Element designates Truman Avenue as two-lane local street between Armstrong Avenue and Temperance Avenue.
- *Church Avenue* is an existing east-west two-lane collector in the vicinity of the proposed project. The City of Fresno General Plan Circulation Element designates Church Avenue as two-lane collector between Marks Avenue and Clara Avenue, a four-lane collector between Clara Avenue and Willow Avenue, a two-lane collector between Willow Avenue and Highland Avenue.

(Locational diagrams of the intersections and roadways studied as part of the Traffic Impact Analysis can be referenced in Figures 1 through 11 of Appendix 6)

Active Transportation Plan

The City of Fresno's Active Transportation Plan (ATP) is a comprehensive guide outlining the vision for active transportation in the City and a roadmap for achieving that vision. Active transportation is defined in the ATP as human-powered travel including walking, bicycling, and wheelchair use. The ATP strives to improve the accessibility and connectivity of the bicycle and pedestrian network in order to increase the number of persons that travel by active transportation and to provide walking and bicycling facilities equitably for all City residents. The following goals are set forth in the plan:

- Equitably improve the safety and perceived safety of walking and bicycling in Fresno
- Increase walking and bicycling trips in Fresno by creating user-friendly facilities
- Improve the geographic equity of access to walking and bicycling facilities in Fresno
- Fill key gaps in Fresno's walking and bicycling networks

Bikeways

There are no existing bicycle facilities at the project site. The nearest existing bicycle facilities are Class II bikeways located along portions of California Avenue (approximately 750 feet to the north) and Armstrong Avenue (approximately 1,300 feet to the west). Farther to the north and west, there are also Class II bikeways present on portions of Hamilton Avenue and Church Avenue. The City of Fresno Active Transportation Plan recommends that a combination of Class I and Class II bikeways be implemented adjacent to and in the vicinity of the project site (City of Fresno 2016). Adjacent to the project site, a Class I bikeway is recommended along the west side of Temperance Avenue, and a Class II bikeways is recommended along the east side of Temperance Avenue. In the vicinity of the

project site, Class II bikeways are recommended along remaining portions of Armstrong Avenue, Temperance Avenue, California Avenue, and Church Avenue.

Walkways

Currently, there are no existing pedestrian walkways along the project site's frontage to Temperance Avenue, but there are sidewalks present on stub streets located at the project site's northern boundary (Arroyo Avenue) and western boundary (Truman Avenue). Pedestrian sidewalks exist on the residential streets to the west of the project site within Tract 6095 and to the north of the project site within Tract 5531. Pedestrian sidewalks also exist along portions of Armstrong Avenue, Hamilton Avenue, and California Avenue. The Fresno ATP recommends that pedestrian sidewalks be implemented adjacent to and in the vicinity of the project site. In the vicinity of the project site, pedestrian sidewalks are recommended along remaining portions of Armstrong Avenue, California Avenue, Temperance Avenue, and Church Avenue.

Transit

Fresno Area Express (FAX) is the transit operator in the City of Fresno (Department of Transportation FAX, 2021). At present, there are no FAX transit routes that operate adjacent to or in the immediate vicinity of the project. The nearest existing FAX routes are Route 1 Q Bus Rapid Transit (BRT) and Route 22, both of which serve the area near Clovis Avenue and Kings Canyon Avenue, approximately two miles northwest of the project site.

LOS Analysis

In accordance with SB 743, as of July 1, 2020, agencies considering the transportation impacts of new projects in the context of CEQA must analyze Vehicle Miles Traveled (VMT). Automobile delay, as described solely by Level of Service (LOS) or similar measure of traffic congestion, is no longer considered a significant environmental impact under CEQA. However, both the City of Fresno and Fresno County still have LOS-based policies included in their respective General Plans, thus the long-range transportation planning for the greater Fresno remains informed by LOS-related considerations. Although the congestion-based analysis presented in the Traffic Impact Study is no longer required for CEQA purposes, the aim of including this analysis is to help promote the provision of a transportation and circulation system that will be of mutual benefit to Sanger Unified, the County of Fresno, and the City of Fresno.

The City of Fresno General Plan has established various degrees of acceptable LOS on its major streets, which are dependent on four (4) Traffic Impact Zones (TIZs) within the City of Fresno. The standard LOS threshold for TIZ I is LOS F, that for TIZ II is LOS E, that for TIZ III is LOS D, and that for TIZ IV is LOS E. Additionally, the General Plan MEIR made findings of overriding consideration to allow a lower LOS threshold that that established by the underlying TIZ. For those cases in which a LOS criterion for a roadway segment differs from that of the underlying TIZ, such criteria are identified in the roadway description. In this case, all study facilities fall within TIZ III, therefore LOS D is used to evaluate the potential significance of LOS impacts to intersections. (Note: As mentioned in the Traffic Impact Analysis, the County of Fresno and Caltrans each have independent measures for acceptable Level of Service, but the agencies' standards are not necessarily applicable based on locational factors. In this case, all study facilities fall within the City of Fresno's SOI, thus the City of Fresno LOS thresholds are utilized.)

The TIS included analysis of eight intersections under various scenarios. The study time periods include the weekday AM and PM peak hours determined between 7:00 and 9:00 a.m. and between 4:00 and 6:00 p.m. Generally accepted traffic engineering principles and methods were employed to estimate the amount of traffic expected to be generated by the project, to analyze the existing traffic conditions, and to analyze the traffic conditions projected to occur in the future. The intersections and scenarios that were evaluated are listed below:

Study Intersections

1. Temperance Avenue / Hamilton Avenue
2. Armstrong Avenue / California Avenue
3. Temperance Avenue / California Avenue

4. Armstrong Avenue / Pitt Avenue
5. Armstrong Avenue / Truman Avenue
6. Temperance Avenue / Truman Avenue
7. Armstrong Avenue / Church Avenue
8. Temperance Avenue / Church Avenue

Study Scenarios

- Existing Traffic Conditions
- Existing plus Project Traffic Conditions
- Near Term plus Project Traffic Conditions
- Cumulative Year 2040 No Project Traffic Conditions
- Cumulative Year 2040 plus Project Traffic Conditions

Based on its analysis of the project as well as existing and predicted future transportation conditions, the TIS presented the following conclusions:

- At build-out, the project is estimated to generate a maximum of 1,323 daily trips, with 469 AM peak hour trips and 119 PM peak hour trips.
- The analysis indicates that the study intersections are currently operating at acceptable levels of service with acceptable queuing conditions. Additionally, based on the traffic signal warrants, operational analysis and engineering judgement, it is not recommended that the city consider implementing traffic signal controls at any of the unsignalized study intersections especially since these operate at an acceptable LOS during both peak periods under stop sign control.
- The Existing plus Project Traffic Conditions scenario assumes that the intersections of Temperance Avenue and California Avenue and Temperance Avenue and Truman Avenue are constructed and operational. Under this scenario, all study intersections are projected to operate at an acceptable LOS during both peak periods.
- Under the Near Term with Project Traffic Conditions scenario, the intersections of Temperance Avenue and Hamilton Avenue, Temperance Avenue and California Avenue, Armstrong Avenue and Church Avenue, and Temperance Avenue and Church Avenue are projected to exceed their LOS threshold during one or both peak periods. To improve the LOS at these intersections, the addition of lanes and modification of traffic control mechanisms is recommended.
- Under the Cumulative Year 2040 No Project Traffic Conditions scenario, the intersections of Temperance Avenue and Hamilton Avenue, Temperance Avenue and California Avenue, Temperance Avenue and Truman Avenue, Armstrong Avenue and Church Avenue, and Temperance Avenue and Church Avenue are projected to exceed their LOS threshold during one or both peak periods. To improve the LOS at these intersections, the addition of lanes and modification of traffic control mechanisms is recommended.
- Under the Cumulative Year 2040 plus Project Traffic Conditions scenario, the intersections of Temperance Avenue and Hamilton Avenue, Temperance Avenue and California Avenue, Temperance Avenue and Truman Avenue, Armstrong Avenue and Church Avenue, and Temperance Avenue and Church Avenue are projected to exceed their LOS threshold during one or both peak periods. To improve the LOS at these intersections, the addition of lanes and modification of traffic control mechanisms is recommended.

- A Queuing Analysis, which compares the storage capacity of traffic lanes to existing and future traffic scenarios, was included as part of the report (see pages 44-47 of Appendix 6). Based on the Queuing Analysis, the report recommended increasing turn lane storage lengths at the Temperance Avenue / Hamilton Avenue intersection (EB Left) to accommodate the Cumulative Year 2040 plus Project Traffic Conditions scenario. At the remaining approaches of the study intersections, the existing storage capacity will be sufficient to accommodate the maximum queue.
- A calculation of the project's Pro-Rata Fair Share of Future Transportation Improvements (i.e., the project's proportionate percentage impact to intersections projected to fall below their LOS threshold and which are not covered by an existing impact fee program) is included in Table X of Appendix 6. It is recommended that the project contribute its equitable fair share as listed there for the future improvements necessary to maintain an acceptable LOS. However, fair share contributions should only be made for those facilities or portion thereof currently not funded by the responsible agencies roadway impact fee program(s) or grant funding, as appropriate. For those improvements not presently covered by local and regional roadway impact fee programs or grant funding, it is recommended that the project contribute its equitable fair share. Payment of the project's equitable fair share in addition to the local and regional impact fee programs would satisfy the project's traffic mitigation measures. The Traffic Impact Analysis does not provide construction costs for the recommended mitigation measures; therefore, if the recommended mitigation measures are implemented, it is recommended that Sanger Unified work with the City of Fresno to develop the estimated construction cost(s).

Based on the analysis presented in the TIA and the District's desire to work with the City of Fresno to provide improvements to the traffic circulation system that will benefit both the City and the District, the following advisory measure is offered by the District, which is not required under CEQA:

Measure T-1 (Advisory: Not required under CEQA): Roadway System and Vehicular Travel Improvements

c. The District will participate in the improvements recommended in the Traffic Impact Analysis (refer to Appendix 6 of the Initial Study) in accordance with the fair share percentages presented in Table 17-1 of the Initial Study.

d. It is recommended that the City consider left-turn and right-turn lane storage lengths as indicated in the Queuing Analysis.

Vehicle Miles Traveled (VMT) Analysis

The project's potential impacts regarding VMT were analyzed using the criteria set forth by the City of Fresno. On June 25, 2020, pursuant to SB 743, the City of Fresno adopted the *CEQA Guidelines for Vehicle Miles Traveled* ("City of Fresno VMT Guidelines") to be effective of July 1, 2020. The City of Fresno VMT Guidelines was prepared and adopted consistent with the requirements of CEQA Guidelines Sections 15064.3 and 15064.7. The *Technical Advisory on Evaluating Transportation Impacts in CEQA* (dated December 2018, published by the State of California Governor's Office of Planning and Research) was utilized as a reference and guidance document in the preparation of the City of Fresno VMT Guidelines.

The City of Fresno VMT Guidelines adopted a screening standard and criteria that can be used to screen out qualified development projects that meet the adopted criteria from needing to prepare a detailed VMT analysis. These criteria may be size, location, proximity to transit, or trip-making potential. In general, development projects that are consistent with the City's General Plan and zoning and that that meet one or more of the following criteria can be screened out from a quantitative VMT analysis.

1. Project is located in a Transit Priority Area/High Quality Transit Corridor (within 0.5 miles of a transit stop).
2. Project is local-serving Retail of less than 50,000 square feet.
3. Project is a Low Trip Generator (Less than 500 average daily trips)
4. Project has a High Level of Affordable Housing Units

5. Project is an Institutional/Government and Public Service Use
6. Project is located in a Low VMT Zone

For projects that are not screened out, a quantitative analysis of VMT impacts must be prepared and compared against the adopted VMT thresholds of significance. The City of Fresno VMT Guidelines includes thresholds of significance for development projects, transportation projects, and land use plans. These thresholds of significance were developed using the County of Fresno as the applicable region, and the required reduction of VMT (as adopted in the City of Fresno VMT Guidelines) corresponds to Fresno County's contribution to the statewide GHG emission reduction target. For residential and non-residential (except retail) development projects, the adopted threshold of significance is a 13-percent reduction, which means that projects that generate VMT in excess of a 13-percent reduction from the existing regional VMT per capita or per employee would have a significant environmental impact. Projects that reduce VMT by more than 13 percent are less than significant. For retail projects, the adopted threshold is any net increase in Regional VMT compared to the existing Regional VMT.

Based on analysis presented in the Traffic Impact Analysis, VMT associated with development and operation of the proposed elementary school campus is not projected to exceed the Fresno County VMT threshold for employment uses of 13 percent below the existing regional VMT per capita. As discussed in Section 17(b) below, the current average VMT to existing schools is 3.4 miles (round-trip), and upon completion of the proposed project, the average VMT is projected to be 2.4 miles (round-trip).

Bicycle, Pedestrian, and Transit Evaluation

Regarding transit planning and service, the project would continue to be served by existing transit in the vicinity, and the District's bus transportation services would be provided for students. No conflicts regarding transit planning and/or policy have been identified during preparation of this Initial Study.

Regarding bicycle transportation, based on review of the City of Fresno General Plan and the City of Fresno Active Transportation Plan, the Traffic Impact Analysis recommends that the project implement Class I and Class II Bikeways along its frontage to Temperance Avenue consistent with the City of Fresno ATP.

Regarding pedestrian transportation, the TIA recommends that the project implement pedestrian sidewalks consistent with the City of Fresno ATP within and adjacent to the project site, and that the project implement pedestrian sidewalks along future portions of Truman Avenue. Additionally, as noted in the TIA, most of the areas immediately to the north and west of the proposed project site are well-developed with walkways and intersection controls, but there are a few areas west of Armstrong and south of the project site that remain undeveloped. In order to promote alternative modes of transportation to and from the project site and improve student safety, the TIA recommends that SUSD work with the City of Fresno to implement a Safe Routes to School plan and seek grant funding to help build walkways and bikeways where they are lacking within a one-mile radius of the proposed project site. The TIA also recommends that the project prepare a school signage and striping plan in the vicinity of the project pursuant to the CA MUTCD Part 3 – Markings and Part 7 – Traffic Control for School Areas, that these be reviewed and approved by the City of Fresno, and subsequently implemented prior to opening day of the school component of the project.

To ensure the project is consistent with applicable plans, policies, and programs related to bicycle and pedestrian transportation, the following mitigation measures have been included for the project:

Mitigation Measure T-2: Bicycle and Pedestrian Safety Measures

a. The project shall implement pedestrian sidewalks consistent with the City of Fresno Active Transportation Plan within and adjacent to the project site.
b. The project shall implement pedestrian sidewalks along future portions of Truman Avenue.
c. The project shall implement Class I and Class II Bikeways along its frontage to Temperance Avenue consistent with the City of Fresno Active Transportation Plan.

d. Sanger Unified shall work with the City of Fresno to implement a Safe Routes to Schools plan and seek grant funding to help build walkways and bikeways where they are lacking within a one-mile radius of the proposed project site.

e. The project shall prepare a school signage and striping plan in the vicinity of the project pursuant to the CA MUTCD Part 3 - Markings and Part 7 - Traffic Control for School Areas, that these be reviewed and approved by the City of Fresno, and subsequently implemented prior to opening day of the school component of the project.

Level of Significance After Mitigation: With implementation of the recommended mitigation measures, impacts related to compatibility with applicable transportation plans and policies will be less than significant.

b. Less Than Significant Impact:

CEQA Guidelines section 15064.3 describes specific considerations for evaluating a project's transportation impacts and provides that, generally, vehicle miles traveled is the most appropriate measure of transportation impacts. 15064.3(b)(1) addresses land use projects as follows:

> *Vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact. Generally, projects within one-half mile of either an existing major transit stop or a stop along an existing high-quality transit corridor should be presumed to cause a less than significant transportation impact. Projects that decrease vehicle miles traveled in the project area compared to existing conditions should be presumed to have a less than significant transportation impact.*

15064.3(b)(4) addresses lead agency discretion and methodology for evaluating VMT impacts:

> *A lead agency has discretion to choose the most appropriate methodology to evaluate a project's vehicle miles traveled, including whether to express the change in absolute terms, per capita, per household or in any other measure. A lead agency may use models to estimate a project's vehicle miles traveled, and may revise those estimates to reflect professional judgment based on substantial evidence. [. . .]*

For purposes of evaluating the project's VMT impacts, the project's Traffic Impact Study utilizes the methodology established by Fresno COG. As discussed in the Traffic Impact Study, VMT associated with development and operation of the proposed elementary school campus is not projected to exceed the Fresno County VMT threshold for employment uses of 13 percent below the existing regional VMT per capita.

The Traffic Impact Study presented the following conclusions regarding the project's VMT:

- Based on data provided by SUSD, the proposed project is located within a defined service area generally bound by Fowler Avenue, Hamilton Avenue, Temperance Avenue and Church Avenue to the west of Temperance Avenue and generally bound by Temperance Avenue, Tulare Avenue, McCall Avenue and Jensen Avenue to the east of Temperance Avenue. Moreover, the area is currently being served by other schools including Hallmark Charter School, Jackson Elementary School, Madison Elementary School, Sanger Academy Charter, Sequoia Elementary School, John S. Wash Elementary School, Quail Lake Charter School, Centerville Elementary School, Del Rey School, Lincoln Elementary School, Lone Star Elementary School, and Wilson Elementary School.

- At present, the average VMT to existing schools is 3.4 miles (round-trip). Upon completion of the proposed project, the average VMT is projected to be 2.4 miles (round-trip). Considering the proposed project is located in an area surrounded by residential land uses with developed sidewalks and streets, this will provide a substantial number of children with the ability to walk or bike to the school site, further reducing the project's transportation VMT impact.

Based on this information, the project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3(b).

c. Less Than Significant with Mitigation Incorporated:

The project is not anticipated to substantially increase potential transportation hazards related to geometric design features or incompatible uses. As a general matter, the proposed elementary school facilities are similar to and compatible with existing uses in the surrounding area.

The TIA included a Collision Analysis that evaluated conditions in the project site vicinity based on collision reports from the Statewide Integrated Traffic Records System (SWITRS) for the most recent five-year period (January 1, 2016, to December 31, 2020). In the five-year period, a total of 30 collisions were reported within the influence zone (assumed to be within 250 feet) of the study intersections. Based on the five-year collision data contained within SWITRS, most study intersections have experienced a low number and severity of collisions per year. Two intersections were further scrutinized in the TIA based on collision data – the Armstrong Avenue and Church Avenue intersection, and the Temperance Avenue and Church Avenue intersection. For the Armstrong Avenue and Church Avenue intersection, the TIA noted that the traffic control was modified from two-way stop to all-way stop control in September 2019, and after thorough review of the data contained within the collision reports for the five-year analysis period, the modification to all-way stop control has reduced the number and severity of broadside collisions, and therefore further changes to the existing traffic controls is not recommended under the existing conditions. For the intersection of Temperance Avenue and Church Avenue, the TIA notes this intersection experienced a total of five collisions but that conditions would be correctable with the implementation of all-way stop traffic controls, which are included as part of Measure T-1.

Further, during development and operation of the project, SUSD will work with City of Fresno to ensure that the project is compliant with policies and standards pertaining to transportation access at the site. For example, the District will consult with the City to determine the final placement of driveways and their access type. For these reasons, the project would result in a less than significant impact related to hazards due to roadway design features or incompatible uses.

d. Less than Significant Impact:

The project would not result in inadequate emergency access at either the project site itself or in its vicinity. Based on the latest proposed project site plan, there will be access to and from the project site from existing local streets south of California Avenue and east of Armstrong Avenue. Moreover, the project proposes to construct future Truman Avenue extending west of Temperance Avenue, which will provide additional access to and from the campus. The design and placement of access points will comply with the City's development standards.

18. Tribal Cultural Resources

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Cause a substantial adverse change in the significance of a tribal cultural resource, defined in the Public Resource Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
(i) Listed or eligible for listing in the California Register of Historical Resources, or in a local		✓		

register of historical resources as defined in the Public Resources Code § 5020.1(k)?				
(ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe?		✓		

Impact Discussion

a. Less Than Significant Impact with Mitigation Incorporated:

Research performed as part of this Initial Study did not identify any known tribal cultural resources at the project site. A California Historical Resources Information System (CHRIS) records search was conducted through the Southern San Joaquin Valley Information Center (SSJVIC). There are no formally recorded prehistoric or historic archaeological resources or buildings or structures within the project area. A Native American Heritage Commission (NAHC) Sacred Lands File search was conducted which did not identify any known areas of concern in the NAHC inventory. A Request for Preliminary Comment and AB 52 Notification was sent to each of the ten tribes identified by the NAHC, but no responses were received.

Although no tribal cultural resources are currently known to exist at the project site, in the event that subsurface resources are discovered during construction, the following mitigation measures shall apply to ensure that such resources are adequately identified and protected.

Mitigation Measure TC-1: Mitigation for Unanticipated Discoveries

If tribal cultural resources are discovered during excavation and/or construction activities, construction shall stop in the immediate vicinity of the find and a qualified professional with expertise in tribal cultural resources shall be consulted to recommend an appropriate course of action with the input of potentially affected tribes. If it is determined that the project may cause a substantial adverse change to a tribal cultural resource, mitigation measures to be considered should include those identified in Public Resources Code Section 21084.3.

Level of Significance After Mitigation: With incorporation of the proposed mitigation measures, the project's potential impact to subsurface cultural resources will be less than significant.

19. Utilities and Service Systems

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

Impact Discussion

a.-e. Less Than Significant Impact:

The proposed project site is adjacent to development that is served by existing water, wastewater, stormwater, electric, gas, and telecommunications facilities. The project includes annexation to the City of Fresno who would provide water and sewer service. The site is located in an area of planned growth that was evaluated in the City of Fresno General Plan and MEIR. The City of Fresno was provided with a Request for Preliminary Comment and did not express any concerns related to services.

Water

Development of the project will entail buildout and installation of water system infrastructure that will connect to the City of Fresno's water system. Existing water system infrastructure currently exists near the project site. The location, design, and construction of water facilities would be subject to review and approval by the City of Fresno.

The connection to the City's water system is included as part of the project description. No aspects of the physical connection process would go beyond the analysis of environmental impacts presented in this Initial Study. The project would be developed in a manner compliant with City of Fresno Department of Public Utilities standards and specifications, as well as any applicable City of Fresno and/or County of Fresno policies and regulations regarding the construction of water system connections.

The project's location and operational characteristics are consistent with the City of Fresno's water service capacity for existing and planned development within its service area. Regarding future conditions, the City of Fresno's 2020 Urban Water Management Plan (UWMP) includes a Water Supply Reliability Assessment, which evaluates the City's anticipated water supplies and water demands in normal year, single dry year, and multiple dry year scenarios. According to the UWMP, the City's water supplies are projected to meet its water demands under all three scenarios through 2045 (refer to Section 7 of the 2020 UWMP). The proposed project's demand for water is not expected to substantially differ from the demand projected from residential uses planned on the site in the City's General Plan, on which assumptions and projections of the UWMP are based. Therefore, this impact is considered less than significant.

Sewer

Development of the project will entail project-specific buildout and installation of wastewater system infrastructure in order to connect the project to the City of Fresno's wastewater system. Existing wastewater system infrastructure currently exists near the project site. The connection to the City of Fresno's wastewater system is included as part of the project description, and no aspects of the physical connection process would go beyond the analysis of

environmental impacts presented in this Initial Study. The location, design, and construction of sewer facilities would be subject to review and approval by the City of Fresno. Additionally, the project is capable of being accommodated by the City of Fresno's wastewater service capacity for existing and planned development within its service area. The quantity of wastewater generated by the proposed elementary school project would be similar to (if not less than) the planned residential land uses that have previously been contemplated for the site by the City of Fresno in the 2014 General Plan MEIR and Wastewater Technical Report.

Storm Drainage

The Fresno Metropolitan Flood Control District (FMFCD) is responsible for managing urban stormwater runoff within the Fresno-Clovis area. Stormwater runoff is conveyed through a system of street gutters, underground storm drains, retention/detention basins, pumping stations, and open channels that are maintained by FMFCD. FMFCD is divided into numerous drainage zones that have (or are planned to have) a system of underground gravity flow pipelines that drain to stormwater retention basins or drainage outfalls. The site is within FMFCD Drainage Area "BM" and will be served by future pipeline that runs along Temperance Avenue. As part of the project's development, the District will submit plans and pay fees to FMFCD to ensure compatibility with the FMFCD system and ensure adequate stormwater drainage is provided.

The addition of new impervious surfaces that would occur from development of the project (e.g., hardscape, building pads, parking lots, streets, driveways) is anticipated to increase stormwater runoff in comparison to existing conditions. However, this is consistent with the type of urbanized development that has been planned for the area and would not result in a significant unplanned change in conditions related to management of stormwater runoff.

Electrical Power, Natural Gas, and Telecommunications

The project site is adjacent to a well-developed area where existing electrical and natural gas service utilities are in place as well as telecommunications facilities such as cellular towers and broadband internet connections. Development of the project will be subject to compliance with applicable rules, regulations, and policies regarding connections to these utilities.

Solid Waste

Impacts of the proposed elementary school campus in relation to solid waste would be less than significant. Sanger Unified operates its existing facilities in compliance with applicable statutes and regulations related to solid waste and would continue to do so upon operation of the proposed project. Development and operation of the project is not anticipated to result in substantial generation of solid waste, and there is sufficient landfill capacity available to serve the project.

20. Wildfire

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?				✓
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from wildfire or the uncontrolled spread of wildfire?				✓
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency				✓

water sources, power lines or other utilities) that may exacerbate fire risk or that may result in the temporary or ongoing impacts to the environment?				
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?				✓

Impact Discussion

a.-d. No Impact:

No impacts involving wildfire would occur as a result of the project. The proposed project site is not located in a State Responsibility Area or classified as a Very High Fire Hazard Severity Zone. (CalFire 2007)

21. Mandatory Findings of Significance

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

Impact Discussion

a. Less Than Significant Impact with Mitigation Incorporated:

Based on the information in Part E, Sections 1 through 20, the potential for the proposed project to have any of the impacts described in this subsection would be less than significant with the mitigation measures incorporated into the project (see Section 4, Biological Resources, and Section 5, Cultural Resources).

b. Less Than Significant Impact:

The term "cumulative impacts" refers to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts. Individual effects may be changes resulting from a single project or a number of separate projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time. By looking outside of a particular project site or action, a cumulative impact analysis allows decisionmakers to look at the impacts of a project within the greater context.

Per CEQA Guidelines Section 15130(b), discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great detail as is provided for the effects attributable to the project alone, and should be guided by the standards of practicality and reasonableness. Where a project's incremental effect is not cumulatively considerable, a lead agency need not consider that effect significant, but shall briefly describe its basis for concluding that the incremental effect is not cumulatively considerable. Additionally, impacts which do not result in part from the project being evaluated should not be discussed.

The CEQA Guidelines identify two basic methods for establishing the cumulative environment in which the project is to be considered: 1) the use of a list of past, present, and probable future projects; or 2) the use of adopted projections from a general plan, other regional planning document, or certified EIR for such a planning document. For this report, the cumulative environment is based on the summary of projections included in the MEIR prepared for the 2014 City of Fresno General Plan and Development Code Update. This approach is being utilized because the project is located within the Plan Area and is consistent with the site's land use designation in the General Plan, thus the potential cumulative impacts would remain consistent with those which were considered in the MEIR.

In the City of Fresno General Plan MEIR, the following environmental effects were determined to be less than significant, or capable of being reduced to less than significant with the incorporation of mitigation measures: Biological Resources, Energy, Geology and Soils, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Population and Housing, and Public Services, and Recreation.

The following environmental effects were determined to be significant and unavoidable in General Plan MEIR:

- Aesthetics – visual character and illumination of the dark sky.
- Agricultural Resources – loss of farmland and removal of Williamson Act Contract land.
- Air Quality – criteria pollutant emissions and toxic air contaminants pollutant concentrations.
- Cultural Resources – potential removal of historic resources.
- Greenhouse Gases – increase in greenhouse gas emissions beyond the year 2020.
- Noise – exceed noise standards and substantial permanent increases in noise levels.
- Transportation and Traffic – potentially exceed thresholds of levels of service on roadways under the jurisdictions of the County of Fresno, City of Clovis, and Caltrans.
- Utilities and Service Systems – construction of water, wastewater, and drainage facilities that could cause substantial impacts associated with loss of agriculture and increases in air emissions.

The project's contribution to the General Plan's significant and unavoidable effects are evaluated below:

- Aesthetics – The project's physical form and operational character are consistent with the types of development that currently exist in the vicinity of the project site and have been planned for in the area as part of the General Plan plus evaluated as part of the General Plan MEIR. Regarding illumination of the dark sky, lighting and glare associated with the project would not be unusual in the context of the urbanized development and land uses that exist in the area, and mitigation measures have been included to provide further reductions in lighting and glare.

- Agricultural Resources – The project's potential for contributing towards cumulative impacts affecting agricultural resources is encompassed in the environmental analysis presented in the 2014 City of Fresno General Plan MEIR. As discussed in Section 2(b), the General Plan MEIR previously evaluated impacts that would result from development of the planned land uses set forth in the City's General Plan, including the conversion of areas within the project site designated as Farmland to urbanized uses. The EIR determined that the conversion of Farmland to urban uses would be a significant and unavoidable impact, with no feasible mitigation measures available to avoid or reduce the impact. The project would not result in a conversion of Farmland beyond what was previously considered as part of the General Plan MEIR.
- Air Quality – Based on the analysis in this Initial Study, neither short-term construction nor long-term operational emissions would exceed applicable SJVAPCD significance thresholds. Additionally, implementation of Mitigation Measures AQ-1 would ensure that potential localized pollutant concentrations upon sensitive receptors are reduced to less than significant levels.
- Cultural Resources – Regarding potential removal of historic resources, implementation of Mitigation Measures CR-1 and CR-2 would ensure that the project's contribution to undiscovered cultural resource impacts would not be cumulatively considerable by requiring construction work to cease in the event of a subsequent discovery during construction, in accordance with applicable laws and regulations.
- Greenhouse Gases – While implementation of the proposed project would contribute to increases of GHG emissions that are associated with global climate change, based on the analysis presented in this Initial Study, the project would not generate GHG emissions in a manner that would be considered significant on its own or cumulatively considerable.
- Noise – Based on the analysis in this Initial Study, and with implementation mitigation measures, neither short-term construction noise levels nor long-term operational noise levels are projected to exceed the City of Fresno's noise ordinance exterior and interior standards at the nearby residential land uses.
- Transportation and Traffic – The analysis of transportation impacts in Section 17 addresses potential cumulative impacts. Based on information presented there, no cumulatively considerable impacts related to transportation would result from the project.
- Utilities and Service Systems – The project site is located immediately adjacent to an established urbanized area that includes water, wastewater, and drainage infrastructure systems. The project would not require the extension of, or substantial modifications to, utilities or service systems in a manner that would result in substantial impacts related to loss of agriculture and/or increases in air emissions.

Based on this information and analysis, implementation of the project would not result in cumulatively considerable environmental impacts.

c. Less Than Significant Impact with Mitigation Incorporated:

Based on the information in Part E, Sections 1 through 20, the proposed project would have less than significant impacts that would cause substantial adverse effects on human beings, either directly or indirectly with the mitigation measures incorporated into the project (see Section 3, Air Quality; Section 13, Noise; and Section 17, Transportation).

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F. Mitigation Monitoring and Reporting Program

1. Purpose

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

2. Lead Agency

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

3. Mitigation Monitoring and Reporting Coordinator

The Chief Operations Officer, or her/his designee, shall act as the Project Mitigation Reporting Coordinator ("Coordinator").

4. Monitoring and Reporting Procedures for Design-, Site Clearing-, and Construction Mitigation Measures

a. The Coordinator shall provide a copy of all project design-, site clearing- and construction-related mitigation measures to the project engineer and contractor for incorporation in the project plans, construction specifications, permits, and contracts, as appropriate.

b. Prior to award of bid, the Coordinator shall determine that all project design-, site clearing- and construction-related mitigation measures have been incorporated in the project plans, construction specifications, permits, and contracts, as appropriate.

c. During construction, the Coordinator, through the construction management team, shall inspect the project area regularly to ensure all work complies with the mitigation measures. If a discrepancy is not resolved within a reasonable time, the Coordinator may order work to cease until the discrepancy is resolved.

d. Prior to the District accepting the project improvements, the Coordinator shall certify that the project incorporates all project design and construction-related mitigation measures.

5. Monitoring and Reporting Procedures for Operational- and Maintenance-Related Mitigation Measures

There are no operations-related mitigation measures.

G. Names of Persons Who Prepared or Participated in the Initial Study/ Environmental Checklist

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H. Sources Consulted

Following are the documents and other sources consulted in preparing this Initial Study:

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