



County of Fresno

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

EVALUATION OF ENVIRONMENTAL IMPACTS

APPLICANT: Jacob and Kimberly Evans

APPLICATION NOS.: Classified Conditional Use Permit Application No. 3656 and Initial Study No. 7681

DESCRIPTION: Allow the expansion of an existing fertilizer manufacturing plant on a 68.67-acre site and onto three contiguous parcels totaling 66.68 acres in the AE-20 (Exclusive Agricultural, 20-acre minimum parcel size) Zone District.

LOCATION: The project site is located on the southwest corner of W. Kamm Avenue and the Butte Avenue alignment, approximately three miles west of the unincorporated community of Helm (20225 W. Kamm Avenue) (Sup. Dist.: 1) (APN: 040-080-40S, 42S, 43S, 44S).

I. AESTHETICS

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

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

FINDING: NO IMPACT:

The project site is fallow and is surrounded by uncultivated, undeveloped land. The site fronts on Kamm Avenue which is not identified as a scenic drive in the County General Plan. No scenic vistas or scenic resources including trees, rock outcroppings, or historic buildings exist on or near the site. The project will have no impact on scenic resources.

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

FINDING: LESS THAN SIGNIFICANT IMPACT:

The proposed project entails expansion of an existing fertilizer manufacturing plant on 66.67 acres to an additional 66.68 acres totaling 135.35 acres. The current facility which convert chicken manure and various byproducts to organic fertilizers consists of offices, outside raw product storage areas, outdoor processing areas, indoor processing areas, and indoor finished product storage areas. The current operation includes 38.40-acre original operation allowed under Conditional Use Permit (CUP) No. 2467 and modified under CUP No. 3265 to allow an additional 29.18 acres of storage and circulation area. CUP No. 3523 was approved to allow the expansion of liquid storage within buildings not greater than 50 feet.

Per the applicant's Operational Statement, the proposed expansion will not affect production capacity but will increase plant efficiency, improve storage conditions and the ability to comply with applicable regulations. There will be no buildings on 66.7 acres expansion area which will be used for raw product storage, a gravel service road and new but previously approved driveway ingress/egress onto W. Kamm Avenue. Within 66.67 acres of the existing facility, new buildings will be added, and some buildings will be removed over time to allow operational and energy efficiencies.

As noted above, the project area consists of uncultivated land with little or no improvements. The closest development is a photovoltaic facility and a single-family residence located approximately one half-mile to the east. Given the current landscape of the area and the fact that the proposed buildings/structures will be comparable in look, size, and height to the existing improvements on the property, the project's impact on the visual character or quality of the area would be less than significant.

- D. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

FINDING: LESS THAN SIGNIFICANT IMPACT WITH MITIGATION
INCORPORATED:

This proposal will utilize outdoor lighting for the proposed buildings/structures that has the potential of generating new sources of light and glare in the area. To minimize any light and glare impact resulting from this proposal, the project will adhere to the following Mitigation Measure:

* **Mitigation Measure**

1. *All outdoor lighting shall be hooded and directed downward so as to not shine toward adjacent properties and public streets.*

II. AGRICULTURAL AND FORESTRY RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an

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

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

FINDING: LESS THAN SIGNIFICANT IMPACT:

The subject proposal will not Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use. The proposed 66.68-acre expansion is classified as Farmland of Local Importance and Semi-Agricultural and Rural Commercial Land on 2016 Fresno County Important Farmland Map

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

FINDING: NO IMPACT:

The subject proposal is an allowed use on the property zoned for agriculture with a discretionary land use approval. All three parcels (66.68 acres) included in the subject proposal are enrolled in Williamson Act Program. The existing fertilizer processing facility is not qualified as a Conditionally Compatible Use; therefore, the subject parcels are required to be removed from the Program through contract Cancellation process. The applicant has filed a petition for Partial Cancellation of Williamson Act Contract No. 2093 with the Policy Planning Unit of the Development Services and Capital Projects Division. The petition will be considered by Agricultural Land Conservation Committee (ALCC) on April 7, 2021. With the petition granted approval, the project will not be in conflict with the Contract.

- C. Conflict with existing zoning for forest land, timberland or timberland zoned Timberland Production; or
- D. Result in the loss of forest land or conversion of forest land to non-forest use; or
- 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?

FINDING: NO IMPACT:

The project site is not forest land or timberland. It is a non-active agricultural land fallowed over the years. The project is considered an appropriate use in agricultural zone district. The proposed improvements will bring a less than significant physical

change to the current landscape of the area which consist of large uncultivated parcels with little or no improvements.

The Fresno County Agricultural Commissioners' Office reviewed the proposal and offered no concerns on the project.

III. AIR QUALITY

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

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

FINDING: LESS THAN SIGNIFICANT IMPACT:

An Air Quality and Greenhouse Gas Analysis, was prepared for the project by LSA Associates, dated February 18, 2021 and provided to the San Joaquin Valley Air Pollution Control District (SJVAPCD) for comments.

As discussed in III. B below, emissions of ROG, NO_x, PM₁₀, and PM_{2.5} associated with the construction and operation of the project would not exceed the District's significance thresholds and would not result in inconsistency with the AQP (Air Quality Plan) for this criterion. The project will comply with rules and regulations related to Regulation VIII Fugitive PM₁₀ Prohibitions and PM_{2.5} standards and may also be subject to Rule 4102 (Nuisance), Rule 4601 (Architectural Coatings), Rule 4641 (Cutback, Slow Cure, and Emulsified Asphalt, Paving and Maintenance Operations) and Rule 4002 (National Emission Standards for Hazardous Air Pollutants).

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

FINDING: LESS THAN SIGNIFICANT IMPACT:

Per the Air Quality and Greenhouse Gas Analysis, the project construction and operations would contribute the following criteria pollutant emissions: reactive organic gases (ROG), carbon monoxide (CO), nitrogen dioxide (NO₂), sulfur dioxide (SO₂), and particulate matter (PM₁₀ and PM_{2.5}). Project operations would generate air pollutant emissions from mobile sources (automobile activity from employees) and area sources (incidental activities related to facility maintenance). Criteria and Greenhouse Gas (GHG) emissions were estimated using the California Emissions Estimator Model (CalEEMod) version 2016.3.2 [California Air Pollution Control Officers Association (CAPCOA) 2017], which is the most current version of the model approved for use by SJVAPCD.

Per the Air Quality and Greenhouse Gas Analysis, the project construction emissions would be 0.3 tons per year for ROG, 2.5 tons per year for NO_x, 2.1 tons per year for

CO, 0.1 ton per year for SO_x, 0.2 ton per year for PM_{2.5}, and 0.3 ton per year for PM₁₀ emissions. The emission is less than SJVAPCD thresholds of 10 tons per year for ROG and NO_x, 100 tons per year for CO, 27 tons per year for SO_x, and 15 tons per year for PM_{2.5}, and PM₁₀ emissions. In addition to the construction period thresholds of significance, San Joaquin Valley Air Pollution Control District (SJVAPCD) has implemented Regulation VIII measures for dust control during construction. These control measures are intended to reduce the amount of PM₁₀ emissions during the construction period and their implementation would ensure that the proposed project further reduces the short-term construction period air quality impacts.

The Long-Term Operational Emissions are those associated with mobile sources (e.g., vehicle trips), energy sources (e.g., electricity and natural gas), and area sources (e.g., architectural coatings and the use of landscape maintenance equipment) related to the proposed project.

Per the Air Quality and Greenhouse Gas Analysis, the project total operation emissions would be 1.4 tons per year for ROG, less than one ton per year for NO_x, CO, SO_x, PM_{2.5}, and PM₁₀ emissions. The emission is less than SJVAPCD thresholds of 10 tons per year for ROG and NO_x, 100 tons per year for CO, 27 tons per year for SO_x, and 15 tons per year for PM_{2.5}, and PM₁₀ emissions. As such, operation of the project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment under an applicable federal or State Ambient Air Quality Standards (AAQS).

Per the San Joaquin Valley Air Pollution Control District review of the project, a Project Note would require that an Authority to Construct (ATC) application shall be submitted to the District subsequent to which the District will conduct the required Health Risk Assessment/Risk Management Review as a part of ATC application review process.

C. Expose sensitive receptors to substantial pollutant concentrations?

FINDING: LESS THAN SIGNIFICANT IMPACT:

Sensitive receptor locations include schools, parks and playgrounds, day care centers, nursing homes, hospitals, and residential dwelling units. The project area is primarily agricultural or undeveloped. The closest sensitive receptor to the project site is a single-family residence located to the east of the project site approximately 2,800 feet from the site boundary. Helm Elementary School is located approximately 2.9 miles to the east of the project site.

Per the Air Quality and Greenhouse Gas Analysis, a screening assessment of potential health risks to nearby receptors was conducted using the SJVAPCDs prioritization calculator. Scores of 10 or greater indicate that a refined HRA should be prepared because there is the potential for a significant health risk. Scores of at least 1 and less than 10 indicate that the project's TAC emissions are not of high risk. Scores of less than 1 are low risk and are not likely to have an adverse health risk.

Per the San Joaquin Valley Air Pollution Control District (SJVAPCD), a project would result in a significant impact if it would expose sensitive receptors to TACs (toxic air contaminants) resulting in an increased cancer risk greater than 20.0 in one million or an increased non-cancer risk of greater than 1.0 on the hazard index (chronic or acute). Based on the screening level prioritization score for the proposed project, the maximum prioritization score total at the nearest worksite and residence receptor would be 2.55e well below the SJVPCD's recommended high-risk screening threshold of 10 for conducting a refined Health Risk Assessment. As a result, the on-site operations would not be anticipated to result in a significant adverse health risk to nearby off-site receptors.

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

FINDING: NO IMPACT:

Per the Air Quality and Greenhouse Gas Analysis, the San Joaquin Valley Air Pollution Control District has not established a rule or standard regarding odor emissions; rather, the District nuisance rule requires that any project with the potential to frequently expose members of the public to objectionable odors should be deemed to have a significant impact.

During project construction, some odors may be present due to diesel exhaust. However, these odors would be temporary and limited to the construction period. Once operational, while there would be odors associated with the fertilizer materials stored onsite, the nearest sensitive receptor, a single-family residence is more than 2,800 feet away. Any odors would dissipate at this distance. Therefore, the project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people. No impact would occur.

IV. BIOLOGICAL RESOURCES

Would the project:

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

FINDING: NO IMPACT:

A Biological Habitat Assessment prepared for the project by Argonaut Ecological Consulting, Inc. and dated January 5, 2020 indicates there is no critical habitat for any listed species within or near the project area. No ground squirrel burrows, or other

potential burrows are present within the 66.68 acres project site. A portion of the site is an active industrial activity and the land is disturbed and maintained. The remainder of the site is in agricultural production and ruderal habitat (around the edges). No wildlife was observed except for small birds in flight. The site does not support suitable habitat for burrowing owls or any other species of concern. There is no nesting habitat for birds. Although, several plant species identified within the California Natural Diversity Database (CNDDDB) potentially occur within this region of Fresno County, the site does not support any species of concern.

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

FINDING: NO IMPACT:

Per the Biological Habitat Assessment, a query of the National Wetland Inventory (NWI) Map shows two wetland types (riverine) near the 66.68 acres project site - the Crescent Ditch to the southwest and an agricultural ditch along the east side of the site. No other wetlands or ponds and no drainage pattern or aquatic feature are present within the site.

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

FINDING: NO IMPACT:

The project site is not located within any designated wildlife movement corridor and contains no wildlife nursery sites, or fisheries resources.

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

FINDING: NO IMPACT:

The project site contains no trees and is not subject to the County of Fresno 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?

FINDING: NO IMPACT:

The project site is within an area defined as PG&E San Joaquin Valley Operation and Maintenance Habitat Conservation Plan (HCP) which applies to PG&E's activities and not the subject proposal. The project will not conflict with HC.

V. CULTURAL RESOURCES

Would the project:

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

FINDING: LESS THAN SIGNIFICANT IMPACT WITH MITIGATION
INCORPORATED:

The project area is moderately sensitive to archaeological finds. Native Americans Heritage Commission (NAHC) conducted a Sacred Lands Search for the property and reported negative results in its search for any sacred sites. The project was also reviewed by the Southern San Joaquin Valley Information Center (SSJVIC) which recommended for an archeological survey of the site. A Cultural Resource Assessment (Report) dated October 7, 2020 was prepared for the project by Argonaut Ecological Consulting, Inc. and provided to SSJVIC.

Per the Report, an archeologist conducted field survey on October 1, 2020 and found no evidence of prehistoric period or pre-historic cultural resources within the project area. Although no resources were found, the Report recommended that if artifacts, exotic rock, or unusual amounts of shell or bone are uncovered during the construction, work should stop in that area immediately and a qualified archeologist should be contacted to evaluate the deposit. If the bone appears to be human, the Fresno County Coroner and Native American Heritage Commission must be contacted. Given the report's recommendation and per the discussion in Section XVIII TRIBAL CULTURAL RESOURCES below, the following mitigation measure would be required to ensure that impacts to cultural resources remain less than significant.

* **Mitigation Measure**

1. *In the event that cultural resources are unearthed during ground-disturbing activities, all work shall be halted in the area of the find. An Archeologist shall be called to evaluate the findings and make any necessary mitigation recommendations. If human remains are unearthed during ground disturbing activities, no further disturbance is to occur until the Fresno County Sheriff-Coroner has made the necessary findings as to origin and disposition. All normal evidence procedures shall be followed by photos, reports, video, and etc. If such remains are determined to be Native American, the Sheriff-Coroner must notify the Native American Commission within 24 hours.*

VI. ENERGY

Would the project:

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

FINDING: LESS THAN SIGNIFICANT IMPACT:

The construction or operation of the project will not result in inefficient, wasteful, or unnecessary energy to impact environment. The project will add various buildings within the footprint of 68.67 acres of the existing fertilizer manufacturing plant. There are no unusual project characteristics that would cause the use of construction equipment to be less energy efficient compared with other similar construction sites in other parts of the State. Therefore, construction-related fuel consumption by the project would not result in inefficient, wasteful, or unnecessary energy use compared with other construction sites in the area.

The project will be subject to meeting California Green Building Standards Code (CCR, Title 24, Part 11-CALGreen) to achieve the goals of Assembly Bill (AB) 32, which has established a comprehensive program of cost-effective reductions of greenhouse gases (GHG) to 1990 levels by 2020.

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

FINDING: NO IMPACT:

The project development would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency and would comply with 2019 Building Energy Efficiency Standards. Pursuant to the California Building Standards Code and the Energy Efficiency Standards, the County would review the design components of the project's energy conservation measures when the project's building plans are submitted.

VII. GEOLOGY AND SOILS

Would the project:

- A. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:
1. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?
 2. Strong seismic ground shaking?
 3. Seismic-related ground failure, including liquefaction?

FINDING: LESS THAN SIGNIFICANT IMPACT:

Per Figure 9-5 of the Fresno County General Plan Background Report, the project site is in an area which has 10 percent probability of seismic hazard in 50 years with peak horizontal ground acceleration of 0 to 20 percent. The project development would be subject to building standards, which include specific regulations to protect improvements against damage caused by earthquake and/or ground acceleration.

4. Landslides?

FINDING: NO IMPACT:

Per Figure 9-6 of the Fresno County General Plan Background Report, the project site is not in any identified landslide hazard area. The project site is flat with no topographical variations, which precludes the possibility of landslides.

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

FINDING: LESS THAN SIGNIFICANT IMPACT:

Per Figure 7-3 of the Fresno County General Plan Background Report, the project site is not in an area of erosion hazards. Grading activities resulting from this proposal may result in loss of some topsoil due to compaction and overcovering of soil for construction of building/structure for the project. However, the impact would be less than significant due to the project requiring an Engineered Grading Plan and a Grading Permit prior to onsite grading activities.

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

FINDING: LESS THAN SIGNIFICANT IMPACT:

As noted above, the project site is flat with no topographical variations. The site bears no potential for on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse due to the project-related improvements. As a standard requirement, a soil compaction report may be required to ensure the weight-bearing capacity of the soils for a building prior to construction permits being issued.

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

FINDING: LESS THAN SIGNIFICANT IMPACT:

Per Figure 7-1 of the 2000 Fresno County General Plan Background Report, the project site appears to be located within an area of moderately to highly expansive soils. However, the risk to life or property would be less than significant in that the project

construction would require implementation of all applicable requirements of the most recent California Building Standards Code and considering hazards associated with shrinking and swelling of expansive soils.

- 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?

FINDING: LESS THAN SIGNIFICANT IMPACT:

New buildings to be located within 68.67 acres of the existing fertilizer manufacturing plant will require on-site sewage disposal systems.

The Fresno County Department of Public Health, Environmental Health Division reviewed the proposal and requires that :1) The onsite sewage disposal system shall be installed under permit and inspection by the Department of Public Works and Planning, Building and Safety Section; 2) the location of the onsite sewage disposal area shall be identified and cordoned off to prevent truck trailer traffic from driving over, causing damage and possible failure of the septic system; and 3) access to septic tanks shall be maintained; and disposal fields, trenches, and leaching beds shall not be paved over or covered by concrete or a material that is capable of reducing or inhibiting a possible evaporation of sewer effluent. These requirements will be included as Project Notes.

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

FINDING: LESS THAN SIGNIFICANT IMPACT:

See discussion in Section V. CULTURAL RESOURCES above.

VIII. GREENHOUSE GAS EMISSIONS

Would the project:

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

FINDING: LESS THAN SIGNIFICANT IMPACT:

Human activities, including fossil fuel combustion and land-use changes, release carbon dioxide (CO₂) and other compounds cumulatively termed greenhouse gases (GHGs). GHGs are effective at trapping radiation that would otherwise escape the atmosphere. The San Joaquin Valley Air Pollution Control District (SJVAPCD), a California Environmental Quality Act (CEQA) Trustee Agency for this project, has developed thresholds to determine significance of a proposed project – either implement Best Performance Standards or achieve a 29 percent reduction from Business as Usual (BAU) (a specific numerical threshold). On December 17, 2009, SJVAPCD adopted *Guidance for Valley Land-Use Agencies in Addressing GHG Emission Impacts for New*

Projects under CEQA (SJVAPCD 2009), which outlined SJVAPCD's methodology for assessing a project's significance for GHGs under CEQA.

Construction and operational activities associated with the proposed project would generate greenhouse gas (GHG) emissions. Per the Air Quality and Greenhouse Gas Analysis, completed by LSA Associates and dated February 18, 2021, GHG emissions were estimated using the California Emissions Estimator Model (CalEEMod) version 2016.3.2 [California Air Pollution Control Officers Association (CAPCOA) 2017], which is the most current version of the model approved for use by SJVAPCD.

Per the Air Quality and Greenhouse Gas Analysis, the San Joaquin Valley Air Pollution Control District does not have an adopted threshold of significance for construction related GHG emissions. Construction of the proposed project would generate approximately 425 metric tons of CO₂e. When considered over the 30- year life of the project, the total amortized construction emissions for the proposed project would be 14 MT CO₂e per year which is less than significant.

Regarding operation related GHG Emissions, long-term GHG emissions are typically generated from mobile sources (vehicle trips), area sources (maintenance activities and landscaping), indirect emissions from sources associated with energy consumption, and waste sources (water supply and conveyance, treatment and distribution). Operation of the proposed project would generate approximately 388 metric tons of CO₂e per year. As neither Fresno County nor SJVAPCD has developed or adopted numeric GHG significance thresholds. This analysis evaluates the GHG emissions based on the project's consistency with the SJVAPCD CCAP and other applicable State GHG reduction goals.

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

FINDING: LESS THAN SIGNIFICANT IMPACT:

Per the Air Quality and Greenhouse Gas Analysis, the project would expand and enhance an existing fertilizer manufacturing plant by making minor changes to the existing operations and would not conflict with any applicable plans, policies, or regulations adopted for the purpose of reduction the emissions of GHGs.

Assembly Bill (AB) 32 Scoping Plan contains GHG reduction measures that work towards reducing GHG emissions, consistent with the targets set by AB 32, Executive Order B-30-15 and codified by Senate Bill (SB) 32 and AB 197. The measures applicable to the proposed project include energy efficiency measures, water conservation and efficiency measures, and transportation and motor vehicle measures, as discussed below.

The project would not conflict with any of the water conservation and efficiency measures and would be required to comply with Title 24 standards of the California Code of Regulations, which includes a variety of different measures, including reduction of wastewater and water use. In addition, project would be required to comply with the

California Model Water Efficient Landscape Ordinance basins. Therefore, the proposed project would not conflict with any of the water conservation and efficiency measures. The proposed project would not conflict with the identified transportation and motor vehicle measures in that the vehicles traveling to the project site and would comply with the Pavley II (LEV III) Advanced Clean Cars Program which will reduce GHG emissions from new cars by 34 percent from 2016 levels by 2025, resulting in a 3 percent decrease in average vehicle emissions for all vehicles by 2020.

The project would comply with existing State regulations adopted to achieve the overall GHG emissions reduction goals identified in AB 32, the AB 32 Scoping Plan, Executive Order B-30-15, SB 32, and AB 197 and would be consistent with applicable State plans and programs designed to reduce GHG emissions.

IX. HAZARDS AND HAZARDOUS MATERIALS

Would the project:

- A. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials; or
- B. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment; or
- C. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

FINDING: LESS THAN SIGNIFICANT IMPACT:

The existing fertilizer manufacturing plant receives solid and liquid chicken manure from poultry ranches. After unloading, the raw material is formed into piles outside or stored in bunkers inside buildings and is used to manufacture feed product, pelletized fertilizer, and liquid fertilizer.

To manufacture feed product, the raw product is mixed, milled, heat treated, and finished product is stored. To manufacture pelletized fertilizer, the raw product is mixed with additives, pelletized and heat treated, and finished product is stored in "bunkers". After passing through qualitative and regulatory tests, the material is either placed in 2,000 lb. totes which are pallets, bagged or sold in bulk. The palletized totes and bags are moved to an inside storage area and buildings. Liquid fertilizer is manufactured from molasses and other additives that are delivered to the site by tanker or bulk material trucks. The ingredients for the liquid fertilizer are blended, heat treated and filtered and stored in large tanks until they are sold and shipped offsite by trucks.

The Fresno County Department of Public Health, Environmental Health Division reviewed of the subject proposal and requires that within 30 days of the occurrence of any of the following events the applicant/operators shall update their online Hazardous Materials Business Plan (HMBP) and site map: 1) there is

a 100 percent or more increase in the quantities of a previously-disclosed material; 2) the facility begins handling a previously-undisclosed material at or above the HMBP threshold amounts; and 3) changes to building structures and/or hazardous materials/wastes storage areas. Additionally, all hazardous waste shall be handled in accordance with requirements set forth in the California Code of Regulations (CCR), Title 22, Division 4.5, and an Underground Storage Tank Removal Permit be obtained to remove any underground storage tank, if found during construction.

Should demolition of the existing structures find an active rodent or insect infestation, the infestation should be abated prior to demolition of the structures in order to prevent the spread of vectors to adjacent properties and the San Joaquin Valley Air Pollution Control District be contacted if asbestos containing materials are encountered in the process of demolishing the existing structures.

If the structures were constructed prior to 1979 or if lead-based paint is suspected to have been used in the existing structures, then, prior to demolition and/or remodel work, the contractor should contact the following agencies for current regulations and requirements: 1) California Department of Public Health, Childhood Lead Poisoning Prevention Branch; 2) United States Environmental Protection Agency, Region 9; and 3) State of California, Industrial Relations Department, Division of Occupational Safety and Health, Consultation Service (CAL-OSHA). Further, any construction materials deemed hazardous as identified in the demolition process must be characterized and disposed of in accordance with current federal, state, and local requirements.

The nearest school, Helm Elementary School, is approximately 2.8 miles east of the project site.

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

FINDING: NO IMPACT:

Per the U.S. EPA's NEPAassist, the project site is not listed as a hazardous materials site. The project will not create hazards 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, result in a safety hazard or excessive noise for people residing or working in the project area?

FINDING: NO IMPACT:

Per the Fresno County *Airport Land Use Compatibility* Plan Update adopted by the Airport Land Use Commission (ALUC) on December 3, 2018, the nearest public airport, Harris River Ranch Airport, is approximately 12.7 miles south of the project site. Because of the distance, the airport will not be a safety hazard or source of excessive

noise for the project. Other nearby airport, San Joaquin Airport is approximately 5.8 miles northwest of the project site.

- F. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

FINDING: NO IMPACT:

The project site is in an area where existing emergency response times for fire protection, emergency medical services, and sheriff protection meet adopted standards. The project does not include any characteristics (e.g., permanent road closures) that would physically impair or otherwise interfere with emergency response or evacuation in the project vicinity.

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

FINDING: NO IMPACT:

Per Figure 9-9 of the Fresno County General Plan Background Report, the project site is outside of the State Responsibility area for wildland fire protection. The project will not expose people or structures to wildland fire hazards.

X. HYDROLOGY AND WATER QUALITY

Would the project:

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

FINDING: LESS THAN SIGNIFICATION IMPACT:

See discussion in Section VII. E. GEOLOGY AND SOILS regarding wastewater discharge.

Per the project Operational Statement, there will be no changes to the methods used to protect groundwater by the existing fertilizer manufacturing plant. The plant operates under various conditions and permits established in prior land use approval. Also, the applicant will comply with all related groundwater protection requirements. The project was referred to the California Regional Water Quality Control Board which expressed no concerns with the project relating to the handling of stormwater or the impacts on groundwater resources.

Per the Fresno County Department of Public Health, Environmental Health Division (Health Department) review of the proposal, a Project Note would require that: 1) to protect groundwater all abandoned water wells on the property shall be properly destroyed under permits and inspections from the Health Department; 2) prior to destruction of agricultural wells, a sample of the upper most fluid in the well column

should be sampled for lubricating oil; 3) should lubricating oil be found in the well, the oil should be removed from the well prior to placement of fill material for destruction; and 4) the "oily water" removed from the well must be handled in accordance with federal, state and local government requirements.

The State Water Resources Control Board, Division of Drinking Water offered no comments on the project by stating that the subject property is a regulated public water system.

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

FINDING: NO IMPACT:

The proposed project involves no changes to the volume of water consumed by the existing fertilizer processing plant. Water is supplied by an on-site well for restrooms, employee breakroom, spray on the piles of raw material, and control of dust. Typical water usage is approximately 35,000 gallons a day.

The project site is not in a low water area of Fresno County. The Water and Natural Resources Division of the Fresno County Department of Public Works and Planning and North King GSA reviewed offered no comments on the availability/ sustainability of water for the project.

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

1. Result in substantial erosion or siltation on or off site?
2. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?
3. Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff; or
4. Impede or redirect flood flows?

FINDING: LESS THAN SIGNIFICANT IMPACT:

The project will not cause significant changes in the absorption rates, drainage patterns, or the rate and amount of surface runoff with adherence to the mandatory construction practices contained in the Grading and Drainage Sections of the County Ordinance Code.

Per the Development Engineering Section of the Fresno County Department of Public Works and Planning, Project Notes shall require that: 1) any additional runoff generated by the proposed project shall not be drained across property lines and be retained onsite per County Standards; 2) an engineered grading and drainage plan shall be approved; and 3) grading permit shall be obtained for any grading that has been done without a permit and any grading proposed with this application.

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

FINDING: LESS THAN SIGNIFICANT IMPACT:

According to FEMA, FIRM Panel 2550H, portions of the parcel and proposed structures are within Flood Zone A and subject to flooding from the 100-year storm. Any proposed development within the Flood Zone will require compliance with Title 15.48 of Fresno County Flood Ordinance.

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

FINDING: NO IMPACT:

The project is not in conflict with any water quality control plan or sustainable groundwater management plan. Fresno County has no Water Quality Control Plan and the North King GSA (Groundwater Sustainability Area) expressed no concerns related to water availability/sustainability for the project.

XI. LAND USE AND PLANNING

Would the project:

- A. Physically divide an established community?

FINDING: NO IMPACT:

The project will not divide any established community. The nearest community of Helm is located approximately 2.8 miles east of the project site.

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

FINDING: LESS THAN SIGNIFICANT IMPACT:

The project site is designated as Agriculture in the Fresno County General Plan and is not located within Sphere of Influence (SOI) of a city. As such, the project will not be in conflict with land use plan, policy, or regulation of any jurisdiction.

The County General Plan allows the proposed facility in an agricultural area by discretionary land use approval, provided applicable General Plan policies are met. The project is consistent with the following General Plan policies.

Regarding consistency with General Plan Policy LU-A.3, criteria a-d, the project entails expansion of an existing fertilizer processing plant which is in an agricultural area and supply agricultural products to farmlands in the area. Further, the project site: 1) is not prime farmland and is classified as Farmland of Local Importance and Semi-Agricultural and Rural Commercial Land in the 2016 Fresno County Important Farmland Map; 2) is not in a water short area and the project will not increase water consumption by the existing facility; and 3) is located near Helm and the City of San Joaquin which can provide adequate workforce.

Regarding consistency with General Plan Policy LU-A.12, Policy LU-A.13 and Policy LU-A.14, the existing fertilizer processing plant is an agriculture-related use and is located on non- prime farmland. The proposed improvements on 66.68 acres area will maintain adequate distance from an existing photovoltaic power generating facility and approved gen-tie line for the facility on adjacent parcels.

Regarding consistency with General Plan Policy PF-C.17, the project is not in a water-short area and will increase water consumption by the existing fertilizer processing plant.

Regarding consistency with General Plan Policy HS-B.1, the project will comply with the California Code of Regulations Title 24 – Fire Code and will obtain District's approval prior to the issuance of building permits.

Regarding consistency with General Plan Policy HS-F.1, the project will handle hazardous material and wastes in accordance with state and local laws as discussed in Section IX. A. of this report.

XII. MINERAL RESOURCES

Would the project:

- A. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state; or
- B. Result in the loss of availability of a locally important mineral resource recovery site delineated on a local General Plan, Specific Plan or other land use plan?

FINDING: NO IMPACT:

No mineral resource impacts were identified in the analysis. The site is not located in a mineral resource area as identified in Policy OS-C.2 of the General Plan.

XIII. NOISE

Would the project result in:

- A. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies; or
- B. Generation of excessive ground-borne vibration or ground-borne noise levels; or
- C. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

FINDING: NO IMPACT:

The construction or operation of the project will not expose people to severe noise levels or create substantial increases in ambient noise levels. The Fresno County Department of Public Health, Environmental Health Division reviewed the project and expressed no concern related to noise.

XIV. POPULATION AND HOUSING

Would the project:

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

FINDING: NO IMPACT:

The project will not result in an increase of housing, nor will it otherwise induce population growth.

XV. PUBLIC SERVICES

Would the project:

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

1. Fire protection?

FINDING: LESS THAN SIGNIFICANT IMPACT:

The Fresno County Fire Protection District's (CalFire) identified no concerns with the project. The project will require compliance with the California Code of Regulations Title 24 – Fire Code and the District's approval of the site plan prior to the issuance of building permits. Additionally, required will be the project annexation into Communities Facilities District No. 2010-01 of the District.

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

FINDING: NO IMPACT:

The project will not impact existing public services, nor will it result in the need for additional public services related to schools, parks, or police protection by the Fresno County Sheriff's Office.

XVI. RECREATION

Would the project:

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

FINDING: NO IMPACT:

The project involves no residential development which may increase demand for neighborhood and regional parks, or other recreational facilities in the area.

XVII. TRANSPORTATION

Would the project:

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

FINDING: LESS THAN SIGNIFICANT IMPACT:

The subject proposal entails expansion of an existing fertilizer manufacturing plant on a 68.6-acre site and onto three contiguous parcels totaling approximately 66.68 acres located at 20225 Kamm Avenue. The project applicant, True Organics, also owns a fertilizer packaging and storage facility located at 16782 W. Kamm Avenue, Helm approximately 3.2 east of the subject proposal (CUP 3656). The applicant has filed a Use Permit application with the County (CUP 3660) proposing to allow packaging, and storage of fertilizer products in Phase 1 and Phase 2 at that location. Per the information provided, that facility and the subject facility (fertilizer manufacturing plant) are linked in their operation and traffic trips between the two would occur on a consistent basis. Given that, the County Design Division required that a single Traffic Impact Study (TIS) be prepared for both projects to determine cumulative traffic impact on Kamm Avenue.

The Design Division also required that a single Scope of Work (SOW) shall be prepared for both projects in order to compare total truck trips identified in SOW with the total truck trips identified in the original use permits (CUP No. 2467 & CUP No. 3265) approved for the subject facility. Furthermore, the existing Traffic Index (TI) should be looked at to determine if the increased truck trips from both projects would likely have an impact.

Peters Engineering Group prepared a Scope of Work (SOW), dated March 11, 2020 and provided to the County Design Divisions, Road Maintenance & Operations Division and California Department of Transportation (Caltrans) for comments. Per the SOW, traffic counts performed in June 2009 revealed daily volumes of 300 to 400 vehicles per day (both directions combined) on Kamm Avenue near the subject facility. Daily traffic volumes on State Route 145 were on the order of 5,000 trips per day in 2009 and on the order of 5,800 to 6,400 in 2017, which is an annual growth rate of as little as 1.87 percent and as much as 3.13 percent. Applying a growth rate of 3.13 percent per year to the daily volumes counted on Kamm Avenue in 2009, the current traffic volumes on Kamm Avenue near subject facility would be less than 600 vehicles per day (both directions combined). Given no substantial development in the region since 2009, the existing traffic volumes are expected to be very low. The SOW further concluded that neither project will generate traffic volumes that exceed the thresholds described in Section 1.3 of the County Guidelines, and there are no known special circumstances with respect to traffic conditions near the project sites. As such, a TIS would not be required for either of the two projects based on the low volumes of project trips and very low traffic volumes on the adjacent streets.

Peters Engineering Group also prepared a Traffic Index (TI) analysis, dated April 28, 2020 for CUP 3660. The TI analysis focused on the anticipated effect of truck traffic resulting from the project on pavement in Kamm Avenue and included the following road segments: Kamm Avenue west of State Route (SR) 145, and Kamm Avenue east of SR 145. The Analysis found that project would not cause TI to increase on the study road segments. The existing TI and TI with Phase 1 and Phase 2 of the project west of SR 145 will remain the same as 8.5 and likewise the existing TI and TI with Phase 1 and Phase 2 east of SR 145 will remain the same as 9.5.

The Design Division and Road Maintenance and Operations Division of the Fresno County Department of Public Works and Planning concurred with the findings of SOW and the TI Analysis and determined that no further studies are required for either project and a less than significant impact related to traffic would occur from these projects.

The California Department of Transportation also reviewed SOW, agreed with its findings, and expressed no concerns with the project.

- B. Be in conflict or be inconsistent with the California Environmental Quality Act (CEQA) Guidelines Section 15064.3, subdivision (b)?

FINDING: NO IMPACT:

Per the Scope of Work (SOW) prepared for the projects by Peters Engineering Group, the State of California Governor's Office of Planning and Research document entitled Technical Advisory on Evaluating Transportation Impacts in CEQA dated December 2018 (OPR Guidelines) indicates that projects that generate or attract fewer than 110 trips per day generally may be presumed to cause a less-than-significant transportation impact. Furthermore, the OPR Guidelines indicates that for the purposes of this section, Vehicle Miles Traveled (VMT) refers to the amount and distance of automobile travel attributable to a project. As the term "automobile" refers to on-road passenger vehicles, specifically cars and light trucks, truck trips typical of those that will be generated by the proposed projects subject to CUP 3656 are excluded from the requirements of CEQA as they pertain to transportation impacts and VMT. As such, no VMT analyses are required for the project.

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

FINDING: NO IMPACT:

The project design will not create hazardous conditions relative to existing or proposed ingress and egress to the site off Kamm Avenue. No concerns were expressed by the Road Maintenance and Operations Division.

The project will require dedication of 13 feet in right-of-way for Kamm Avenue as a Condition of approval for the project.

- D. Result in inadequate emergency access?

FINDING: NO IMPACT:

The project development will not impact the existing access to the project site off Kamm Avenue which will continue to be used during emergencies.

XVIII. TRIBAL CULTURAL RESOURCES

Would the project:

- A. Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:
1. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k); or
 2. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? (In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.)

FINDING: LESS THAN SIGNIFICANT IMPACT:

The project site is in an area of moderate sensitivity to archaeological finds. Pursuant to Assembly Bill (AB) 52, the subject proposal was routed to the Santa Rosa Rancheria Tachi Yokut Tribe, Picayune Rancheria of the Chukchansi Indians, Dumna Wo Wah Tribal Government, and Table Mountain Rancheria offering them an opportunity to consult under Public Resources Code (PRC) Section 21080.3(b) with a 30-day window to formally respond to the County letter. No tribe requested consultation, resulting in no further action on the part of the County. The Table Mountain Rancheria (TMR), however, requested to be informed in the unlikely event that cultural resources are identified on the site. With the Mitigation Measure included in the CULTURAL ANALYSIS section of this report any potential impact to tribal cultural resources will be reduced to less than significant.

XIX. UTILITIES AND SERVICE SYSTEMS

Would the project:

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

FINDING: LESS THAN SIGNIFICANT IMPACT:

See discussion in Section VII. E. GEOLOGY AND SOILS above. The project may result in a less than significant expansion of electric power and/or natural gas to the proposed improvements.

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

FINDING: NO IMPACT:

See discussion in Section X. B. HYDROLOGY AND WATER QUALITY above.

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

FINDING: LESS THAN SIGNIFICANT IMPACT:

See discussion in Section VII. E. GEOLOGY AND SOILS above.

- D. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals:
or
- E. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

FINDING: LESS THAN SIGNIFICANT IMPACT:

There will be no change to the volume or methods of handling solid and liquid waste. A minimal amount of daily solid waste generated by the office and employee break room is less than 0.1 cubic yard. The solid waste is placed in a dumpster that is serviced weekly by a private hauler. The impact of solid wastes on local land fill resulting from this proposal would be less than significant.

XX. WILDFIRE

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

- A. Substantially impair an adopted emergency response plan or emergency evacuation plan, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects; or
- B. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire; or
- C. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment; or

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

FINDING: NO IMPACT:

The project site is not in or near state responsibility areas or land classified as very high fire hazard severity zones.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

Would the project:

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

FINDING: LESS THAN SIGNIFICANT IMPACT:

The project will have no impact on biological resources. It would not degrade the quality of the environment; reduce the habitat of a fish or wildlife species; cause a fish or wildlife population to drop below self-sustaining levels; threaten to eliminate a plant or animal community; or reduce the number or restrict the range of an endangered, rare, or threatened species. Impacts on cultural resources have been reduced to a less than significant level with a Mitigation Measure incorporated in Section V. CULTURAL RESOURCES above.

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

FINDING: LESS THAN SIGNIFICANT IMPACT:

Each of the projects located within Fresno County has been or would be analyzed for potential impacts, and appropriate project-specific Mitigation Measures are developed to reduce that project's impacts to less than significant levels. Projects are required to comply with applicable County policies and ordinances. The incremental contribution by the proposed project to overall development in the area is less than significant.

The project will adhere to the permitting requirements and rules and regulations set forth by the Fresno County Grading and Drainage Ordinance, San Joaquin Air Pollution Control District, and California Code of Regulations Fire Code at the time development occurs on the property. No cumulatively considerable impacts relating to Agricultural and Forestry Resources, Air quality, or Transportation were identified in the project

analysis. Impacts identified for Aesthetics, and Cultural Resources will be mitigated by compliance with the Mitigation Measures listed in Sections I and Section V of this report.

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

FINDING: NO IMPACT:

No substantial impacts on human beings, either directly or indirectly, were identified in the analysis.

CONCLUSION/SUMMARY

Based upon Initial Study No. 7681 prepared for Conditional Use Permit Application No. 3656, staff has concluded that the project will not have a significant effect on the environment. It has been determined that there would be no impacts to biological resources, mineral resources, noise, population and housing, recreation, or wildlife.

Potential impacts related to agriculture and forestry resources, air quality, energy, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, public services, transportation, tribal cultural resources, utilities and service systems have been determined to be less than significant.

Potential impacts to aesthetics and cultural resources have been determined to be less than significant with the identified Mitigation Measures.

A Mitigated Negative Declaration is recommended and is subject to approval by the decision-making body. The Initial Study is available for review at 2220 Tulare Street, Suite A, street level, located on the southwest corner of Tulare and "M" Streets, Fresno, California.

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