

Appendix K

Revisions to Draft SEIR

The revisions below are listed by page number as found in the Draft SEIR. All additions to the text are underlined (underlined) and all deletions from the text are stricken (~~stricken~~).

Section 1.0 – Executive Summary

This summary presents an overview of the Producers Dairy Cheese Plant Project (Proposed Project), and conclusions of the analysis contained in Section 4, Environmental Analysis, of this Supplemental ~~EIR~~ Environmental Impact Report (Supplemental EIR or SEIR). Additions to the text of the 1991 Tower District Specific Plan Final Environmental Impact Report (Tower District FEIR) are shown in double underline and omissions are shown in strikethrough in Section 1.7, Changes to the Tower District FEIR. This section also summarizes areas of controversy and alternatives to the project. For a complete description of the Proposed Project, please consult Section 3.0 - Project Description of this ~~Supplemental Environmental Impact Report (SEIR)~~ SEIR and Section 3.0, Project Description of the Initial Study.

Section 1.1.1 – SEIR Format – Pages 2-3.

- **Appendices:** The appendices for this document contain the following supporting documents:

Appendix A: Producers Dairy Cheese Plant Project Initial Study

Appendix B: Community Outreach/Scoping Meeting Minutes

Appendix C: Memorandum for Record – Engineering Contacts

Appendix D: Memorandum for Record – Building Relocation Estimate

Appendix E: December 19th, 2016 SEIR Scoping Meeting Minutes

Appendix F: 1991 Tower District FEIR Excerpt

Appendix G: Acoustic Study

Appendix H: AB 52 Consultation

Appendix I: Additional Air Quality Data

Appendix J: Response to Draft SEIR Comments

Appendix K: Changes to the Draft SEIR

Section 1.1.3 – Summary of Revisions to the Draft SEIR

The City of Fresno, as Lead Agency under CEQA, has prepared revisions to the Draft SEIR. Revisions are based upon the Project proponent proposing new operational hours, and additional information added to the Revised Draft SEIR in the interest of clarification. New edits include updates to the Project operational hours, a new appendix with additional air quality data (Appendix I), a new mitigation measure (NOI 2) prohibiting the operation of trailer refrigeration units on the Project Site, and a new appendix with comments and responses to comments on the Draft SEIR (Appendix J). The full revisions to this Draft SEIR are listed in Appendix K.

Section 1.3 – Project Summary – Page 4

Producers Dairy proposes to remove two boarded-up buildings at 450 E. Belmont Avenue totaling approximately 12,500 square feet. The purpose of this Proposed Project is to secure additional parking for Producers Dairy delivery trailers due to the loss of delivery trailer parking at the southwest corner of Tuolumne Street and H Street to the High-Speed Rail project. Producers proposes to replace the existing

wall and chain link fence situated on the north half of the parcel with a decorative iron and brick pilaster security fence. Additionally, Producers proposes to construct a 12-foot-high cinderblock sound wall situated on the south half of the parcel. The project will result in an additional 20 vehicle trips per day (from 50 round-trips per day to 70 round-trips per day). The proposed hours of operations will be 24 hours a day, though a majority of vehicle trips will occur between 7am to 10pm.

Section 1.6 – Areas of Controversy – Page 6

Air Quality Impacts. Several public comments during the community outreach and scoping meeting expressed concern over potential air quality impacts from increased delivery trailer traffic and expansion of delivery trailer parking. These potential impacts were analyzed in Section 6.3, Air Quality, of the Initial Study and found that the Proposed Project would have a less than Significant Impact. Additional air quality data can be found in Appendix I to this SEIR. The San Joaquin Valley Air Pollution Control Board District (SJVAPCD) has established in the Small Project Analysis Level (SPAL) a threshold of CEQA significance for criteria pollutant emissions. As stated in the SJVAPCD SPAL, “In the interest of streamlining CEQA requirements, projects that fit the descriptions and project sizes provided... are deemed to have a less than significant impact on air quality and as such are excluded from quantifying criteria pollutant emissions for CEQA purposes.” Calculations are provided to ensure a less than significant impact on air quality. ~~This~~ The SPAL threshold has two categories: for Industrial Projects: 1) Vehicle Trips per Day, and 2) Project Footprint Type. The SPAL threshold for Industrial Projects by Vehicle Trips per Day threshold for Industrial Projects is 1,506 trips/day (SJVAPCD SPAL 2016). The Proposed Project will produce a total of 70 vehicle round-trips per day, and is therefore 1,436 trips per day (95.4%) below this threshold. The SPAL Project Type threshold for General Light Industry Proposed Project also is below the threshold for General Light Industry projects based on project footprint, as the threshold is 510,000 square feet, or 11.71 acres (SJVAPCD SPAL 2016). The proposed, and the entire Project footprint is 80,000 square feet or 1.843 acres, (SJVAPCD SPAL 2016) which is 9.88 acres (84.3%) below the threshold. The Proposed Project is 84.3% below the project footprint threshold. The SJVAPCD current threshold of significance for Toxic Air Contaminant emissions for carcinogens allows for a maximally exposed individual risk of 10 in one million, which using the SJVAPCD Prioritization Calculator equates to a Total Particulate Matter annual emissions threshold of 4.3 lbs. per year. The Project Total Particulate Matter emissions are calculated at 3.7 lbs. per year, which is 0.6 lbs. per year (14%) below the threshold (Appendix I). Finally, the Project is below the ambient air quality threshold of significance (Appendix I) and is not near a source of hazardous air pollutants or odors. Therefore, the Proposed Project would neither conflict with nor obstruct the implementation of any applicable air quality plan, and would result in a less than significant impact. Consequently, this issue is not further addressed in this Supplemental EIR.

Section 1.7 – Changes to the Tower District FEIR – Page 9

Noise	NOI 2	<u>The Proposed Project will not operate Refrigeration Trailer Units on the Project Site at any time. The Proposed Project will not utilize the project site area south of the project access locations for the purpose of storing operational refrigeration trailer units at any time.</u>
-------	-------	---

Section 1.8 – Mitigation Measure & Significant Impact Summary – Page 15

MM NOI 2: The Proposed Project will not operate Refrigeration Trailer Units on the Project Site at any time. The Proposed Project will not utilize the project site area south of the project access locations for the purpose of storing operational refrigeration trailer units at any time.

Section 2.1 – Initial Study – Page 20

The City exercised its authority as the Lead Agency to reexamine noise and vibration impacts. As such, potential Noise and Vibration impacts are further analyzed in Section 4.2, Noise, of this Supplemental EIR. During the preparation of this Supplemental EIR the current delivery trailer parking site was relocated from 1752 G Street to the parking lot at the southwest corner of H Street and Tuolumne St in the City of Fresno. The new delivery trailer/truck routes therefore require further analysis, and are further analyzed in Section 4.3, Transportation and Traffic, of this supplemental EIR. Further information on air quality and emissions from the Project is supplied in Appendix I to this SEIR in the interest of additional disclosure. It should also be noted that the Project is additionally consistent with City General Plan Policy RC-5-b (Greenhouse Gas Reduction Plan) through the reduction of Vehicle Miles Traveled. See Section 4.3 of the Draft SEIR for more details regarding reduction of VMT.

Section 3.1 – Project Description – Page 27

The purpose of the Project is to expand delivery trailer parking on the Project site. As outlined in Development Permit No. D-16-088, Producers proposes to remove two boarded-up buildings at 450 E. Belmont Avenue site. Producers proposes to build a commemorative monument onsite reusing brick from the existing buildings. Producers also proposes to replace the existing Concrete Masonry Unit (CMU) wall and chain link fence situated on the north half of the parcel facing E. Belmont Avenue business on the North, Northeast, and Northwest portion of the parcel with a decorative iron security fence supported by brick pilasters of appropriate spacing. Producers will incorporate bricks from the existing buildings into the pilasters if reusable brick is still available after construction of the commemorative monument. Additionally, Producers proposes to construct a 12-foot-high Concrete Masonry Unit sound wall situated on the south side of the parcel facing residential properties on the South, Southeast, and Southwest portion of the parcel. The sound wall assists in mitigating noise to the surrounding area. Variance Application No V-17-001 has been filed with the City of Fresno. Accommodating these delivery trailers at 450 E. Belmont Avenue is consistent with the property's existing use. The Project will result in an additional 20 vehicle trips per day (from 50 round-trips per day to 70 round-trips per day). The proposed hours of operations will be 24 hours a day, though a majority of vehicle trips will occur between 7:00 am to 10:00 pm.

Section 4.2.4 – Noise and Vibrations Impact Discussion – Page 55

However, it may be assumed that residential construction will reduce exterior noise levels by a minimum of 25 dB if windows and doors are closed and a minimum of 15 dB if windows and doors are open (Paul S. Veneklasen & Associates 1973, cited in Caltrans 2002:7-37). This will be sufficient for compliance with the City's 45 dB L_{dn} interior standard.

Mitigation Measures:

Mitigation Measure NOI 1: The Proposed Project will include an installation of a 12-foot-high Concrete Masonry Unit (CMU) sound wall. The wall will be along the southwest, southern, and southeast border of the property.

Mitigation Measure NOI 2: The Proposed Project will not operate Refrigeration Trailer Units on the Project Site at any time. The Proposed Project will not utilize the project site area south of the project access locations for the purpose of storing operational refrigeration trailer units at any time.

Section 4.2.4 – Noise and Vibrations Impact Discussion – Page 56-57

Based upon truck events observed by WJVA, a total of 70 trucks per day utilizing the site would result in approximately 182 truck movement events. For the purpose of this analysis, it was assumed that truck movements could occur at any hour of the day, and could be evenly distributed over a 24-hour day. ~~While the project only proposes truck operations from 7am to 10pm, operations over a 24-hour day were analyzed to evaluate potential future worst case scenario of potential future expansion of hours of operations.~~

Section 4.2.4 – Noise and Vibrations Impact Discussion, Mitigation Discussion – Page 57

In order to maintain compliance with the City's applicable noise level standards, the applicant shall not utilize the project area south of the site entrances for truck movements between the hours of 10:00 p.m. to 7:00 a.m. ~~or for operating idling refrigeration trailer units at any time during the day.~~ The applicant may, however, utilize the project area north of the project site entrance at any hour of the day for truck movements ~~as well the usage of idling refrigeration trailers.~~ The parking area south of the site entrances shall only be used for truck movements between daytime hours of 7:00 a.m. to 10:00 p.m.

Section 4.3 – Traffic Impacts – Page 62

The Proposed Project site is located in TIZ-II. Local Proposed Project site is located in TIZ-II and TIZ-1. SR 180 represents the boundary between TIZ-I and TIZ-II, with TIZ-I being located south of SR 180. City staff has indicated that it is the City's practice to apply the more conservative of the TIZ criteria to intersections on the boundary. Therefore, intersections on Belmont Avenue will be considered within TIZ-II.

Because the Proposed Project will generate a total of 20 new vehicle round-trips, it is below the 200 or more peak hour new vehicle trips threshold for a Traffic Impact Study. Therefore, under Fresno General Plan Implementing Policy M-2-I, a Traffic Impact Study is not required for the Proposed Project.

Section 4.3 – Traffic Impacts – Page 62

City of Fresno Traffic Signal Mitigation Impact (TSMI) Fee Program

The City of Fresno's Traffic Signal Mitigation Impact (TSMI) fees are charged to new development in the City, to mitigate traffic impacts through the funding of traffic signal improvements that serve new development. TSMI fees for new development are calculated ~~by multiplying the established fee rate by the new development's average daily traffic (ADT)~~ through a fee per unit rate schedule based upon the type of project.

Section 4.3 – Traffic Impacts – Page 62

Bicycle, Pedestrian and Trails Master Plan

~~The 2010 City of Fresno Bicycle, Pedestrian and Trails Master Plan is intended to guide and influence bikeway policies, programs, and development standards to make bicycling in the City of Fresno more safe, comfortable, convenient, and enjoyable for all bicyclists. The plan identifies a recommended network of bicycle facilities that consists of 195 miles of additional Class I Bike Paths, 503 miles of additional Class II Bike Lanes, and 72 miles of Class II Bike Routes. The plan also sets forth objectives, goals, and policies to guide the implementation of the recommended network. The current Fresno General Plan supports the plan's aspirations for a comprehensive bicycle and pedestrian facilities network.~~

Active Transportation Plan

On March 2, 2017, the City of Fresno adopted the Active Transportation Plan (ATP), which supersedes the 2010 City of Fresno Bicycle, Pedestrian and Trails Master Plan. The ATP is a comprehensive guide outlining the vision for active transportation in the City of Fresno, and is a roadmap for achieving that vision. The ATP envisions a complete, safe, and comfortable network of trails, sidewalks, and bikeways that serves all residents of Fresno. The recommended buildout network would add 165 miles of Class I Bike Paths, 703 miles of Class II Bike Lanes, 67 miles of Class III Bike Routes, 2 miles of Class IV Separated Bikeways, and 805 miles of sidewalks. Currently no bike paths exist within 0.33 miles of the Project site, according to Figure 32, Insert 4 of the ATP.

Section 4.3.2 – Existing Conditions – Page 63

Local delivery trailer traffic is currently split between Routes A and B. Route A traffic (Error! Reference source not found.) is for delivery trailers that make more than one delivery trip per day, and the trailers are currently stored at the Staging lot on H Street at the south-west corner of H Street and Tuolumne Street Figure. Route B traffic (Error! Reference source not found.) is for delivery trailers that make one or fewer delivery trips per day, and the trailers are currently stored at the Project site at 450 E. Belmont Ave. Route B currently has 50 vehicle round-trips per day.

Section 4.3.2 – Existing Conditions – Page 66

The Proposed Project is bounded by E. Belmont Avenue to the north, N. Ferger Avenue to the west, N. Roosevelt Avenue to the east, and by two residential properties to the south. Delivery trailer traffic currently enters and exits the Project site from the east side on N. Roosevelt Avenue (**Figure 11**). The Project site currently has 50 delivery trailer vehicle round-trips per day.

Section 4.3.4 – Impact Discussion – Page 67

Proposed Route

As discussed in Section 4.3.2 of this SEIR, delivery trucks currently travel on Route A and B (Error! Reference source not found. and Error! Reference source not found.). Route A is 4.2 miles long (Error! Reference source not found.) and Route B is 2.71 miles long (Error! Reference source not found.). Currently, 50 delivery truck round-trips per day travel on Route B. Under the Proposed Project, all delivery trucks traveling Route A will instead use Route B, and the current Staging site at H Street and Tuolumne Street will no longer be used by Producers Dairy. This will lead to an increase in local traffic to the Project Site at 450 E. Belmont Ave by 20 vehicle round-trips per day (**Table**). As Route B is 1.58 miles shorter than Route A, this will lead to a total reduction of vehicle miles traveled by 33% for trucks that would normally use Route A. This leads to an overall reduction in vehicle miles traveled.

Table 15 – Project Site - Delivery Round-Trips Per Day

Status	<u>Round-Trips/Day</u>
Current	50
Proposed Project	70

Proposed Site Entrance/Exit

Under the Proposed Project, the entrance to the Project site on N. Roosevelt Ave will be relocated approximately 25 feet to the north, and a new exit will be made on N. Ferger Ave (Error! Reference source

not found.). Delivery trailer traffic will enter on N. Roosevelt Ave, and exit on N. Ferger Ave. As previously stated, vehicle trips per day to the Project site will increase from 50 round-trips per day to 70 round-trips per day.

Section 4.3.a.1 – Traffic Impacts – Page 69

Indirect Traffic and Circulation

As noted in Error! Reference source not found., **Table** , Error! Reference source not found., and **Figure 12** above, indirect effects are reduced under the proposed traffic flow pattern. 1.58 miles of indirect effects are proposed to be reduced with the new traffic flow regime, resulting in a 33% percent reduction in traffic in the local area. As previously noted in Section 4.3.1, the Proposed Project is consistent with the Fresno General Plan. Because the Proposed Project will generate a total of 20 new vehicle round-trips, it is below the 200 or more peak hour new vehicle trips threshold for a Traffic Impact Study. Therefore, under Fresno General Plan Implementing Policy M-2-I, a Traffic Impact Study is not required for the Proposed Project.

Pedestrian Traffic

Per City traffic design, the closest crosswalk across E. Belmont Avenue is at the intersection of N. Palm Avenue and E. Belmont Avenue. Additionally, the Project site and the immediate surrounding residential neighborhood south of E. Belmont Avenue are not Priority Pedestrian Areas as shown in Figure 51, Inset 4 of the City of Fresno Active Transportation Plan.

Section 5.4 – On-Site Re-Use (Façade) Alternative – Page 75

Under the On-Site Re-Use Alternative, activities called out in the Project Description would remain the same with the exception of activities related to the façade of the large building. In this alternative, the North and South Building wall façades would be brought up to code, shored and a parking lot would be constructed in the remaining open areas.

The estimate for demolishing both buildings, and structurally retrofitting the façades amounts to \$487,500, while the estimated cost for demolishing both buildings amounts to \$52375,000. The difference between the estimated costs of preserving the façades and demolishing the building is \$112,500, which equates to an estimated cost increase of 30%.

Section 6.2 Significant and Unavoidable Impacts – Page 82

CEQA Guidelines Section 15126.2(b) requires that an EIR describe any significant impacts that cannot be avoided, including those which can be mitigated but not reduced to a level of insignificance. The Proposed Project would result in the demolition of two historically significant buildings, a significant impact. Implementation of Mitigation Measures CUL 1 through CUL 6 5 would not reduce this impact to a less-than significant level and therefore, this impact would remain significant and unavoidable. In addition, the project's contribution to cumulative impacts on significant historic resources would be considerable and would remain a significant cumulative and unavoidable impact of the Proposed Project. More information on these impacts is found in Section 4 of this Draft Supplemental EIR.

Section 8 – References – Page 91 Veneklasen, Paul S., & Associates. 1973. Noise Insulation Problems in Buildings. As cited in State of California Department of Transportation, Division of Aeronautics.

2002 (January). California Airport Land Use Planning Handbook. Available:
www.dot.ca.gov/hq/planning/aeronaut/htmlfile/landuse.html. Accessed July 2005.